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## EUROCITIES RESPONSE TO THE CONSULTATION ON THE GREEN PAPER ON THE FUTURE OF THE COMMON EUROPEAN ASYLUM SYSTEM

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EUROCITIES

1, Square de Meeus

1000 Brussels

Belgium

[simon.guentner@eurocities.eu](mailto:simon.guentner@eurocities.eu)

EUROCITIES, the network of large European cities, welcomes the goal of the second stage of the Common European Asylum System, namely to achieve “a higher common standard of protection and greater equality in protection across the EU and to ensure a higher degree of solidarity between EU Member States”. As asylum seekers seek out and live in cities after their arrival in Europe, cities have a particular role to play with regard to the reception and integration of the newcomers into our society. In the “Contribution to Good Governance Concerning the Integration of Immigrants and Reception of Asylum Seekers” EURO CITIES has outlined its main position on this matter. Our response to the consultation on the Green Paper is based on this document.

While all issues raised in the Green Paper are of fundamental relevance, this response concentrates on the questions which have a direct impact on cities, in particular issues around the integration of migrants. EURO CITIES would like to encourage the European Commission to consider the role of cities and the civil society in migration and asylum policies in its deliberations, and in particular during the public hearing following this consultation.

## Legislative Instruments

### a) processing of asylum applications

*(1) How might a common asylum procedure be achieved? Which aspects should be considered for further law approximation?*

A crucial point for EUROcities is that asylum reception policies should, from arrival on, promote rather than hinder the long-term integration of refugees. Consequently, support services and employment need to be accessible during this process. Asylum seekers and refugees do not want to be dependent on benefits and prefer making a contribution to society. Access to employment after a certain period would strengthen their sense of self-belief and help them to integrate better and faster in cases where they are later granted asylum.

*(2) How might the effectiveness of access to the asylum procedure be further enhanced? More generally, what aspects of the asylum process as currently regulated should be improved, in terms of both efficiency and protection guarantees?*

From the perspective of cities, asylum procedures need to be decent, fair and fast. They need to include decent reception centres and housing, the provision of adequate health care and legal counsel, and the provision of sufficient income and access to employment that would enable newcomers to live in accordance with the minimum necessary standards of our communities.

*(3) Which, if any, existing notions and procedural devices should be reconsidered?*

It is important to increase the possibilities to obtain employment during procedures. Nothing is more damaging to human dignity and mental health than to wait a long time in forced idleness and insecurity, and nothing is more damaging to prospects for successful integration in the formal labour market than a prolonged period of unemployment. Furthermore, the educational needs of young immigrants need to be met early to support their integration. Special attention needs to be paid to unaccompanied minors seeking asylum and those granted refugee status.

The danger of the “destitution trap” also needs to be considered. If a claim for asylum has been refused, most asylum seekers are left without support or access to services, afraid of the situation back home, often sleeping rough or deciding to work illegally. This leaves local authorities and the voluntary sector in a difficult situation. Improved return strategies that consider this transition phase are needed. However, all costs incurred as a result of changes in systems must be met in full if this approach is to be viable for cities.

*(4) How should a mandatory single procedure be designed?*

It is important to recognise the role and statutory duties of local authorities as support and accommodation are provided at a local level. The effects on asylum seekers, wider communities and services of any mandatory single procedure that might be agreed upon, need to be manageable at the local level. Furthermore, it is crucial for all relevant bodies and non-governmental organisations to work together in an organised, integrated way. Coordination between these actors ensures that appropriate and accessible services, advice and support are provided, synergies developed and information is shared. It helps to avoid tension and improves the situation of refugees and asylum seekers. Such coordination could be encouraged by the European Commission and financially supported across all member states.

**b) reception conditions for asylum seekers**

*(6) In what areas should the current wide margin of discretion allowed by the Directive's provisions be limited in order to achieve a meaningful level-playing field, at an appropriate standard of treatment?*

See response to 2)

**d) cross-cutting issues**

*(15) How could the provisions obliging Member States to identify, take into account and respond to the needs of the most vulnerable asylum seekers be improved and become more tailored to their real needs? In what areas should standards be further developed?*

The special situation of traumatized persons with post traumatic stress disorder requires special support so as to ease transition. When providing education for minors, their origins, language and culture have to be taken into account. Whenever possible, counselling and support should be offered to asylum seekers in their native language as they are in the middle of a legal procedure, when they need to understand what is happening. Asylum seekers and refugees are not a homogeneous group, and services - in particular health services - need to be culturally sensitive. Moreover, it has to be taken into account that their process of integration differs from that of migrants who have voluntarily chosen to move to the country. Very often it is up to local facilities to supply this form of support to asylum seekers. Building and supporting the capacity of local facilities (in the statutory and other sectors) is important to ensure they are sufficiently resourced and able to respond both to the needs of individual asylum seekers and to any wider and additional demands that might arise in the future as a result of the further development of common

standards.

Furthermore, we want to mention the usefulness of supporting awareness raising activities that celebrate the contribution of refugees to society and promote understanding about reasons why people seek sanctuary. Such activities, which have already been organised in many European cities, help to foster community cohesion and demystify some of the prejudices people have about asylum seekers.

*(17) What further legal measures could be taken to further enhance the integration of asylum seekers and beneficiaries of international protection, including their integration into the labour market?*

In order to promote a receptive attitude in the host society as well as to familiarize asylum seekers with the host society, the time pending the award of asylum should be used to gain qualifications, to be gainfully employed or at least carry out voluntary work as a meaningful activity. This enhances their ability in the longer-term to contribute to economy and society after refugee status has been granted. In a harmonized system of asylum procedures, asylum seekers should no longer be denied these opportunities. A combination of private accommodation and activities in reception centres might provide both privacy and steps towards social integration.

*(18) In what further areas would harmonization be useful or necessary with a view to achieving a truly comprehensive approach towards the asylum process and its outcomes?*

Often, people whose application for asylum has been rejected seek the anonymity of the urban environment and are in limbo as regards legal rights and material provisions. However, cities cannot afford to ignore them, as these people are living amongst the population and need support. It will be necessary to foster conditions which would make it possible for cities to promote the safe, dignified and voluntary return of persons if they are not granted asylum. For these people, too, the time spent in their host country should be meaningful and an opportunity for new orientation and to gain skills that should facilitate their future lives in their countries of origin.

## **Solidarity and Burden Sharing**

### **b) Financial Solidarity**

*(25) How might the ERF's effectiveness, complementarity with national resources and its multiplier effect be enhanced? Would the creation of information-sharing mechanisms such as those mentioned above be an appropriate means? What other means could be*

*envisaged?*

All activities aiming at the management of the consequences of migration and supporting integration are carried out locally. Cities, as service providers and often responsible authorities, need to be included in the decision-making and implementation of the Common European Asylum System from an early stage.