

# Managing migration through data: The expansion and integration of Eurodac

Virginie Jacob

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security authorities detention  
return European Union facial image processing  
eu-LISA Commission interoperability access  
law enforcement Eurodac admission  
international protection Member States  
third-country national territory  
biometric data

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# Executive summary

Eurodac, the IT biometric system originally established to support the asylum policy of the European Union (EU), is undergoing a fundamental transformation. Following the New Pact on Migration and Asylum and the adoption of reforms in 2024, Eurodac is set to become the operational backbone of the EU migration management framework, extending well beyond its initial purpose.

The new system will collect and retain several sets of biometric and biographic data on a wide range of individuals, including those irregularly present on the territory, to allow more accurate surveillance of irregular movements and faster identification of non-EU nationals. Eurodac's further integration into the new interoperable environment will reinforce its central role in border control, irregular migration management and return. This shift aligns with overall priorities in migration policy as well as the EU's growing focus on return as a political and operational goal.

While the new Eurodac could potentially enhance migration policy and strengthen trust between member states, realising its added value will be contingent on its effective implementation. Without effective implementation, interdependence could quickly become a burden, generating unintended systemic failures across all relevant dimensions of EU migration policy. The updated

system is expected to support faster identification and more effective return cooperation. However, shortcomings in implementation capacity, uneven preparedness among member states and limited safeguards for data sharing with third countries could undermine these objectives.

Ultimately, the success of Eurodac will depend not only on technical readiness but also on strong political commitment to a coordinated, rights-based implementation that balances operational goals with data protection and fundamental rights obligations.

This Discussion Paper points to the opportunities as well as the challenges and risks associated with Eurodac's expansion. The expanded functions and scope of Eurodac aim to enhance migration management and address irregular migration more effectively. However, as outlined in this paper, the implementation of these changes will require careful investments. Attention is also devoted to compliance with fundamental rights, including meeting data protection standards.

Altogether, these reflections underscore the importance of balancing migration management concerns with the protection of individual rights, maintaining high standards on data integrity and enabling cooperation with partner countries that respects privacy and human dignity.

# 1. Introduction

Eurodac, the European Asylum Dactyloscopy System, is a large-scale IT system established by the European Union (EU) to collect biometric data. In operation since 15 January 2003, its original purpose was to facilitate the implementation of EU asylum policy by assisting member states in determining the country responsible for examining asylum applications. To this day, and in line with this goal, the Eurodac system stores and compares the biometric data of non-EU nationals seeking asylum and those apprehended in connection with an irregular crossing of EU external borders.<sup>1</sup>

In the context of the reforms to the Common European Asylum System (CEAS) adopted with the New Pact on Asylum and Migration (hereinafter ‘Pact’), the EU revised the Eurodac Regulation. The revised Regulation, which will be applicable as of mid-2026, significantly expands the quantity of data collected and stored in the system. A broader set of biographic and biometric data will be gathered, extending beyond fingerprints to include facial images, identity documents and many personal details. Additionally, the information will be collected from asylum applicants and non-EU nationals apprehended at the external border, but also irregularly staying non-EU nationals, resettled persons, beneficiaries of temporary protection, and those disembarked following search and rescue (SAR) operations.

The aim is to build a more comprehensive overview of the different categories of non-EU nationals in the EU, especially those arriving irregularly, and to monitor unauthorised onward movements within the Union, often referred to as secondary movements. This enhanced picture of the migration situation will support the overall migration management system that the Pact seeks to establish. It will close existing gaps—as categories such as that of persons who are undocumented in the Union’s territory are currently not recorded in any EU database—and will enable the production of detailed statistics to support assessments of migratory pressure. The expanded dataset will also facilitate integration with other EU systems, such as the Visa Information System (VIS), reinforcing the approach to integrated border management. In addition, the new system will facilitate the implementation of key elements of the Common European Asylum System (CEAS) following the Pact reforms, including the newly established solidarity mechanism.<sup>2</sup>

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These goals go beyond supporting member states in determining the country responsible for examining asylum applications. The Eurodac system is thus set to become an integral tool of EU migration management. Further demonstrating this, the Eurodac revision also coincides with renewed efforts at EU and national levels to overhaul the EU’s return framework, legislatively and operationally.<sup>3</sup>

Increasing returns is a point of consensus among member states and it is seen as essential to ensure the functioning of the CEAS. Illustrating this, in a May 2024 letter to Commission President Ursula von der Leyen, 15 member states declared the Pact as being insufficient to address irregular migration to Europe, calling, among other things, to increase the efficiency of returns.<sup>4</sup> Following a further call by the European Council,<sup>5</sup> the Commission proposed an EU Return Regulation in March 2025, to simplify and speed up procedures, flanked by measures to improve return and readmission cooperation.<sup>6</sup>

The expansion of Eurodac will also support return policy more effectively, notably by facilitating the identification and re-documentation of irregular non-EU nationals through access to recorded identity documents and detailed personal data. As the revised Eurodac includes a provision allowing data to be shared for return purposes,<sup>7</sup> it may further assist returns to third countries with which there are agreements or arrangements in place, a possibility envisaged in the Return Regulation proposal.<sup>8</sup>

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As also shown by the choice to present it as the first ‘building block’ in the Commission’s Common Implementation Plan for the Pact, Eurodac can thus be described as the “operational backbone” of the new EU migration and asylum framework.<sup>9</sup> However, realising the added value of Eurodac will be contingent on its effective implementation. And, as noted in the Commission June 2025 communication on the Pact’s implementation, several member states face delays in procurement for system equipment and integration, with their national systems putting the timely implementation of the reforms, including Eurodac, at risk.<sup>10</sup> Delivering on Eurodac’s objectives will require more than technical readiness, however.

Political willingness and ownership from member states will also be essential.

This Discussion Paper begins by exploring the revision of the Eurodac rules. It then explains the expansion of the Eurodac system's functions from asylum to migration management, examining its potential central role in supporting the implementation of Pact reforms and return policy. It then moves on to addressing some of the key implementation challenges and the

implications for data privacy and fundamental rights, in relation to the Pact and return policy respectively, also drawing on past shortcomings. The Discussion Paper concludes with some forward-looking reflections, highlighting potential gaps, for instance in addressing delays in implementation, in ensuring adequate safeguards related to data-sharing with third countries, as well as in guaranteeing compliance with fundamental rights and in meeting data protection standards.

## 2. Eurodac's evolution: From limited support to the asylum system to comprehensive migration management

The Eurodac system consists of a central database of fingerprints and personal data as well as of rules determining their means of transmission. It is currently governed by a 2013 Regulation which will remain applicable until mid-2026, when the revised Eurodac Regulation will enter into force.

Under the current system, fingerprints and limited biographic information<sup>11</sup> are collected for three categories of non-EU nationals, who are 14 years of age or above: i) applicants for asylum; ii) non-EU nationals apprehended in connection with an irregular crossing of an external border; iii) non-EU nationals found irregularly present in the EU territory. However, data collection for the third group is not mandatory in the current framework.

The data retention period varies; asylum applicants' data is stored for ten years, whereas the retention period is 18 months for persons apprehended at the border. Data for irregularly staying persons is instead currently not stored in Eurodac.

In line with its original objective, Eurodac aims to facilitate the application of responsibility rules under the Dublin system, also to avoid unauthorised movements within the Union.<sup>12</sup> It therefore only allows fingerprint comparison against the asylum and irregular border crossings categories. Under the current system, it is not possible to search or identify a person through biographic data. The system functions based on a 'hit/no hit' response. This means that there is a return to a search only when there is a match for fingerprints. A 'hit' indicates that an asylum applicant is already registered in the database, which could lead to a Dublin procedure being initiated.

In the current system, the functions of Eurodac and the information it provides are therefore strictly limited to supporting the asylum framework and the application of Dublin rules. Where data is collected for non-EU nationals found irregularly present in the territory, this is only used for comparison purposes with asylum applicants. This limitation in Eurodac's current scope, combined with the lack of biographic data collection, and the fact that data

for irregularly staying persons is not currently stored in the database, makes Eurodac unsuitable for identification for return purposes. Therefore, such identification for return relies mainly on information contained in national databases and, in certain cases, on return alerts recorded in the Schengen Information System (SIS).

In 2020, the first von der Leyen Commission decided to introduce an amended Eurodac proposal as part of the Pact reform, proposing to expand the system's objectives beyond asylum, and serve a wider range of migration management purposes. While, at the time, irregular arrivals to the Union had decreased – largely because of the COVID-19 pandemic and related mobility restrictions – there was a significant rise in the proportion of migrants arriving from countries with low asylum recognition rates.<sup>13</sup> At the same time, applications for asylum continued to rise, also suggesting that applications in multiple member states within the EU were commonplace.

This situation put pressure on national asylum systems but also highlighted the need to introduce more efficient procedures with a clear nexus between an initial screening at the border and a subsequent return procedure for persons ineligible for protection. Eurodac had a central role to play in both steps.

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The co-legislators found a political agreement on the proposed Eurodac revision in December 2023. Following its adoption in May 2024, the revised Regulation is set to become applicable at the time of most other Pact reforms, in July 2026. The new rules illustrate the evolving priorities of EU migration policy, which emphasise the reduction of irregular migration and secondary movements, and the swift identification of undocumented non-EU nationals and their return.

To this end, the revised Regulation introduces some significant changes. First, it expands the categories of non-EU nationals required to be registered in Eurodac. While only asylum applicants and non-EU nationals in connection with an irregular border crossing were previously registered, Eurodac will, from 2026 onwards, also store data for irregularly staying non-EU nationals, resettled persons, beneficiaries of temporary protection and persons disembarked following search and rescue (SAR) operations.

Second, more biographic and biometric data will also be collected. These include, inter alia, facial images, scans of travel and identity documents (if authenticated), names and nationalities, along with migratory data like asylum application status, responsible member state according to rules set out in the Asylum and Migration Management Regulation (AMMR)<sup>14</sup> or return information. Given the wide variety of data, much of which will be collected at different stages of procedure, the system will require continuous updates to ensure that the information remains accurate and operationally relevant. Notably, the deadline for transmitting data to the central system remains unchanged at 72 hours, despite the significantly increased volume and complexity of data to be collected.

Third, the age for fingerprinting has been lowered from 14 to six years old. While this change can be presented as a means to support child protection and facilitate family tracing, it also raises serious concerns around the risk of disproportionate or insufficiently justified data processing. In particular, the reliability of biometric data collected from young children is questionable, as both fingerprints and facial features evolve with age, potentially undermining future matching.<sup>15</sup> In addition, despite the significant amount of personal data collected under the revised Regulation, it will not include vulnerability indicators or outcomes of age assessments.

Fourth, the scope of data comparisons has been significantly expanded. The revised system will provide for automatic crosscategory comparison of biometric data. This means that the records from any category of non-EU nationals, whether asylum applicants, irregular bordercrossers, irregular stayers, persons intercepted during SAR and beneficiaries of temporary protection may be checked against all others. The system will return a hit result based on the full data for all matched records.

Thanks to the revised rules, once they start applying, member states will have access to a wide variety of information on the individuals registered in Eurodac, facilitating their identification, enabling more effective detection of multiple entries, secondary movements and identity inconsistencies. This will also effectively support the expanded functions of the new system. For example, in the case of return procedures, it will not only help authorities to identify relevant non-EU nationals but also to assess the risk of absconding by checking whether there are multiple entries within the system.

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Relatedly, the revised Eurodac rules will facilitate the implementation of return policy. The proper identification of non-EU nationals found irregularly present on Union territory is essential for the return process. Beyond supporting data sharing among member states, many countries of origin also require copies of identity documents and, in some cases, biometric data to process readmission requests and issue valid travel documents for individuals subject to a return procedure (also known as ‘re-documentation’). A further change that the adopted Eurodac revision introduces will thus enable member states to share personal data with third countries for return purposes.

In this respect, the new rules also set some basic safeguards to protect sensitive personal data, among other things, by precluding the sharing of asylum-related information and ensuring that third countries use the data for return purposes only.<sup>16</sup> These new provisions, however, should also be read in light of the Return Regulation proposed in March 2025 and the Commission’s recent proposal related to safe third country concept.<sup>17</sup> These further reforms, which are currently under negotiation, foresee the possibility of returning individuals to countries other than their country of origin, based on agreement or arrangement and commonly referred to as ‘return hubs’. Hence, to understand the full implications of the new rules for return policy, they should also be read in conjunction with ongoing legislative processes.

Finally, the revised Eurodac Regulation extends the data retention period to five years for non-EU nationals in connection with an irregular border crossing and those found to be “illegally staying” in a member state. This five-year period coincides with the duration of a potential entry ban foreseen for returned non-EU nationals, thus aiming to further support the enforcement of return-related measures. This provision in the revised rules also

reflects an effort to align Eurodac with other IT systems and databases within the Justice and Home Affairs (JHA) area (see below, Section 3).

All these changes therefore aim to strengthen migration management and the monitoring of irregular movements to and across the EU, while aligning closely with member states’ objectives in return policy.

### 3. Connecting the dots: Eurodac’s role in the EU’s integrated migration system

The revised Eurodac system will play a central role in the implementation of the Pact when, in July 2026, the reforms will become fully applicable. This centrality is also underlined in the Common Implementation Plan launched in June 2024. The Common Implementation Plan constitutes the operational roadmap for the implementation of the Pact. It translates the new legal framework into concrete deliverables by identifying key milestones, responsibilities and timelines and is structured through ten thematic building blocks, each corresponding to a core element of the Pact.

Eurodac constitutes the first building block and the Commission itself has described it as “the operational backbone supporting the new legal framework”.<sup>18</sup> As the Common Implementation Plan also explains, Eurodac will support four functions, in particular: i) the new ‘seamless process’ at the EU’s external borders; ii) the implementation of the responsibility rules and the new solidarity mechanism established by the new AMMR; iii) monitoring and assessments, including of Union preparedness and migratory pressure; and iv) return and readmission (see Section 4).

Concerning the first function, the revised Eurodac system will be crucial for the new screening stage that the Pact foresees for non-EU nationals entering the EU irregularly and the implementation of asylum and return border procedures, as set out in respective regulations. These should lead to a seamless process at the EU’s external borders.<sup>19</sup> As such, Eurodac will support early identification and registration of non-EU nationals at the border and facilitate their channelling into the appropriate procedure.

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Eurodac’s key role for enabling this seamless process and integrated border management is also reflected in the Common Implementation Plan, which highlights that “the new system to manage migration flows at the EU external border (building block 2) will not be operational unless Eurodac is up and running on time”.<sup>20</sup>

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Regarding the second function, Eurodac will support the implementation of the AMMR, a key instrument introduced by the Pact which includes a solidarity mechanism and, once applicable, will replace the Dublin system, while mirroring the basic rationale currently underpinning responsibility assignment in many of its provisions. Eurodac will do so by ensuring consistency between registration, responsibility allocation, solidarity measures, and the monitoring of secondary movements. More specifically, the system will contribute to the operationalisation of transfers and relocations under the new responsibility and solidarity mechanism. It will also facilitate the application of responsibility rules for asylum applications, in line with its original goals but considering the changes foreseen by the AMMR. For instance, the new category of persons disembarked after SAR operations included in the revised Eurodac corresponds to a new responsibility criterion under the AMMR and is treated separately from irregular border crossings, as SAR arrivals bypass regular border management.

While the added value of such a fragmentation of categories is not always self-evident— since SAR arrivals often de facto fall under other categories such as asylum applicants or irregular border crossings— the Commission argues that this will allow for a more accurate mapping of arrivals.<sup>21</sup>

The updated system should also improve data-gathering and produce new and more reliable statistics. It will differentiate further between different categories of non-EU nationals and, unlike the current system, will count individual applicants rather than asylum applications, addressing the long-standing difficulty of accounting for multiple applications by the same person.

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The data gathering function will also underpin the new annual migration management cycle and help implement the new solidarity mechanism.<sup>22</sup> Eurodac data will be

used to inform the assessment included in the European Annual Asylum and Migration Report—although the first such Report, expected for October 2025, will rely on existing statistical sources and not on Eurodac data.<sup>23</sup> The Annual Report plays an important role in the Pact’s implementation cycle, among other things, as it establishes the preparedness level of the Union and determines which member states are facing migratory pressure. In turn, this assessment forms the basis for outlining annual solidarity needs to be covered through the Solidarity Pool.

Additionally, Eurodac will be integrated into other IT systems which, in a context of interoperability, should enhance external border management, address irregular migration and improve the security of the Schengen area (see Box 1 below). Altogether, interoperable IT databases should also produce cross-system statistics collected through Eurodac, the Visa Information System (VIS), the European Travel Information and Authorisation System (ETIAS) and the Entry-Exit System (EES). This, it is hoped, will enable more “evidence-based policy making”.<sup>24</sup>

#### **BOX 1: CREATING INTEROPERABLE IT SYSTEMS AND AN EFFECTIVE DATA CROSS-CHECKING ENVIRONMENT**

As a key priority under the New Pact, the implementation of interoperable IT systems is intended to ensure reliable and instantly available information across all existing databases.<sup>25</sup> Systems included in the interoperability architecture are the SIS, Eurodac, the VIS, the EES, the ETIAS and the European Criminal Record Information System (ECRIS-TCN). VIS, ETIAS and EES are also designed for reducing irregular migration by facilitating the identification of visa overstayers, improving border checks and strengthening internal security.

Interoperability will involve four elements: i) a European search portal allowing simultaneous search of multiple information systems, in compliance with rules governing access rights; ii) a shared biometric matching service for detecting links between biometric information on the same person in different systems; iii) a common

identity repository containing biometric and biographic information; iv) a function automatically detecting multiple or fraudulent identities.

Delays in the implementation of the EU’s interoperability framework have been consistently reported over the years. These have been largely due to the incomplete readiness of national IT systems, gaps in technical functionalities and weak coordination among key stakeholders. The repeated postponements of the launch of the EES, which is essential for detecting overstayers, also had an impact on the interoperability calendar. In May 2025, the Council and the European Parliament reached a provisional agreement to ensure a progressive launch of the system. The Commission has recently set 12 October 2025 as the date for progressive start of operations.<sup>26</sup>

## 4. Eurodac and the challenge of effective returns

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Return policy is considered crucial for the functioning and credibility of the CEAS. According to the Commission, an ineffective return policy undermines the credibility of the entire migration system.<sup>27</sup> Return procedures are seen as a means to ensure that protection is given to those who are entitled to it, while those without a right to stay are returned. For some member states, an ineffective return policy can also create incentives for irregular migration, encourage repeated or unfounded asylum applications and overburden the capacity of reception and asylum systems.

At the same time, low return rates and ineffective return policy are also said to undermine public trust in EU migration policy.<sup>28</sup> Relatedly, making the EU return system more effective and addressing existing shortcomings has also become a priority for political reasons, among other things, due to the growing popularity of anti-immigration platforms forcing the topic to the top of the policy agenda.

In this context, strengthening return policy is considered a key objective of the revised Eurodac and its expanded functions. However, a closer look at the links between the revised Eurodac and both the current and proposed return frameworks suggests the need for caution, particularly regarding their combined impact on rights and implementation.

The Return Directive currently governs the EU's return policy. This instrument, which dates back to 2008, sets out common standards governing the return of irregular migrants.<sup>29</sup> The Return Directive leaves wide discretion to member states in implementing these standards, resulting in fragmented implementation across the EU. Further challenges relate to divergent practices concerning the collection and sharing of return-related data. This fragmentation contributes to legal uncertainty and ineffective return policies.

The implementation of the return framework has also faced operational shortcomings, such as limited resources, procedural delays and inadequate cooperation with third countries on readmission.<sup>30</sup> These challenges are compounded by persistent difficulties in identifying undocumented non-EU nationals, as authorities often rely on incomplete or fragmented information. Currently, relevant information can be exchanged through the SIS, as indicated above. However, SIS suffers from limited real-time availability of return alerts and from difficulties in data exchange. This problem is amplified by the absence of an interoperability framework, which currently prevents authorities from cross-checking information with other migration databases such as Eurodac, hindering effective identification.

These shortcomings contributed to low return rates, which many member states consider to be the key measure of success of the existing return framework.<sup>31</sup>

The revised Eurodac system, combined with the forthcoming interoperability framework, are expected to improve identification and support more efficient return and readmission procedures. From this perspective, the revision of Eurodac should improve the identification of non-EU nationals subject to return, facilitate re-documentation by third countries and enable faster and more targeted return procedures. However, it will not in itself address all legal and operational shortcomings in the current return framework.

Illustrating this, in practice, Eurodac will not store return decisions or alerts. These will continue to be recorded in the SIS, in line with legal framework and operational choices that predate the Pact negotiations. As a result, return-related information will remain split across different databases, each governed by different legal instruments, also raising the risk of operational challenges.

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**Notwithstanding the expanded data collection for non-EU nationals enabled by the revised Eurodac system, the return system would continue to use the SIS as the sole EU-wide tool for storing and exchanging information on return decisions and the related readmission procedures.**

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It is against this backdrop characterised by legal and operational challenges that the Commission presented a proposal for a Return Regulation in March 2025. This legal instrument would, if adopted, replace the Return Directive. The proposed Regulation, which remains under negotiation by the European Parliament and Council, seeks to make returns swifter and more effective by, among other measures, harmonising procedures, standardising practices, enhancing cross-border cooperation, and applying stricter rules on detention and entry bans. It also introduces a legal basis for so-called return hubs, enabling member states to transfer “illegally staying” non-EU nationals who are subject to a return decision outside the EU territory, to countries other than their countries of origin. The operationalisation of such return hubs hinges on the conclusion of agreements or arrangements with third

countries under specific conditions, including the conditions for the stay and the respective obligations of the parties, the modalities of return to the country of origin, the set-up of an independent mechanism monitoring the agreement and the consequences in case of violations of the agreement.

What is significant, however, is that the Return Regulation does not alter the current system, relying on the SIS for return information. Notwithstanding the expanded data collection for non-EU nationals enabled by the revised Eurodac system, if the Commission’s proposal for a Return Regulation were to be adopted, the return system would continue to use the SIS as the sole EU-wide tool for storing and exchanging information on return decisions and the related readmission procedures.

## 5. Implementation at risk: technical, political and operational challenges

Eurodac will be at the heart of the new asylum system and could potentially enhance processes and policies thanks to its functional interdependence with different systems. Ensuring timely and effective implementation of new Eurodac rules will also be crucial for strengthening trust between member states. Yet, realising its added value will be contingent on its effective implementation. Without it, interdependence could quickly become a burden, generating unintended systemic failures across all relevant dimensions of EU migration policy.

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Illustrating this, a failure to carry out registrations of applicants for asylum of non-EU nationals arriving at the external border, and of those irregularly present on the territory of member states, would lead to gaps across the entire system. Gaps in Eurodac would also trickle down to other IT systems, due to interoperability. The assessment of solidarity needs and the effectiveness of the solidarity mechanism would be directly impacted, undermining, instead of strengthening, mutual trust and rendering the overall migration management system more complex and less effective.

In this context, it is important to recall that, since its entry into force, the implementation of Eurodac has already faced problems. This included lack of alignment with other important EU databases (like the SIS and VIS), which the 2024 reform has sought to close with new rules also on interoperability.<sup>32</sup>

However, those problems also included gaps in registrations. In fact, one of the major shortcomings of the so-called 2015/16 migration crisis was the failure of member states to systematically register individuals at the external borders under Eurodac.<sup>33</sup> This was partly caused by the overwhelming volume of arrivals and partly by a reluctance to uphold existing rules, as member states on the frontline perceived the Dublin system as leading to unfair responsibilities.

It is not a surprise that, in the context of the preparation of the recent Pact reforms, the Commission did not miss the opportunity to emphasise that Eurodac is “a critical precondition for the implementation of all the other elements of the Pact”.<sup>34</sup>

Illustrating this, the first building block of the Common Implementation Plan on Eurodac highlights that appropriate workflow, sufficient human resources, technical equipment, as well as systematic fingerprinting will need to be operationalised. To this end, member states and eu-LISA, the EU agency for the operational management of large-scale IT systems, have to make considerable investments as the revised Eurodac must be built from scratch. From the Common Implementation Plan, it is also clear that not all the functionalities will be implemented by July 2026 as not all of them are a precondition for the functioning of the Pact (e.g. implementing the category of beneficiaries of temporary protection).

Critical features will, therefore, be prioritised by July 2026. It is reasonable to assume that features related to the implementation of responsibility, the monitoring of irregular migration, return, and internal security (law enforcement access with the possibility of alphanumeric query) will be given primary focus in the new framework.

Nevertheless, member states must adapt their regulatory frameworks, organisation, and administrative process to make sure that sufficient capacity will be in place to match the considerable expansion of Eurodac functionalities in terms of volume of non-EU nationals and data to be recorded. All of this will inevitably pose challenges with, among other things, ensuring registrations and the integration of the data into the IT system.

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From a practical perspective, collecting additional information, including new biographic data as well as data on relocations, transfers under Dublin, returns (e.g. assisted voluntary return granted) or previous visa issuances will place an even more significant burden on member states, compared to the currently applicable rules. While the challenge exists for all national authorities, the workload will be significant especially for countries at the EU's external borders, particularly but not only in the event of increased irregular arrivals.

In gathering the required data, operational challenges like translating personal information—for example, if not in the Latin alphabet—and verifying authenticity of identity documents will also arise. Moreover, since the 72-hour deadline for data transmission to the central system remains unchanged, it could result in a reduced application of safeguards and guarantees in the event of large volume of arrivals. This may also result in unnecessary use of coercion, including on children, especially as the revised regulation allows the use of coercion as a last resort. More broadly, the expansion of information collected means that authorities will need to constantly update the data, requiring investments in equipment and training, as well as in staff, to guarantee an efficient process and the integrity of data registered in the system at different points in time.

The implementation of the revised Eurodac rules may also create further challenges in specific areas of migration policy. Data collected in the context of

screening illustrate this. Registration in Eurodac will be one of the first steps to be completed following arrival at the external borders and will be central to the entire procedure that follows, especially for channelling purposes. Based on the information collected, non-EU nationals will be directed either to the regular asylum procedure, the asylum border procedure, the return border procedure, or other relevant tracks such as transfers under responsibility or solidarity rules. It is also at this stage that vulnerabilities can be assessed or specific guarantees for children ensured. However, the lack of registration of vulnerability indicators, family links, and age assessments could have consequences for fundamental rights and may result in people being wrongfully channelled into the wrong procedure.

Beyond the above implementation challenges, further obstacles have already become apparent, as the Commission also acknowledges. National authorities have developed National Implementation Plans based on the Commission's Commission Implementation Plan, outlining how they intend to adapt their systems to align with the new provisions under the Pact as well as the revised Eurodac rules.<sup>35</sup>

Based on the National Implementation Plan and follow-up exchanges, the Commission released, in June 2025, a Communication on the state of play of the Pact's implementation. Halfway through the roll-out of the Pact, and 12 months before the Pact's 'implementation day', the Commission's Communication flags several concerns regarding member states' preparedness. Notably, some have yet to designate a national authority responsible for implementation, a step that, according to the Common Implementation Plan, should have been completed by September 2024. The Communication also points to delays in procurement procedures and a lack of sufficient financial and human resources.

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Another pressing challenge is the integration of Eurodac into national systems. This is a requirement for member states that have made the choice to connect their internal systems to Eurodac instead of opting for a central solution, separate from the national systems, developed by eu-Lisa. Those elements will be critical to carry out the mandatory operational test, though.<sup>36</sup>

Besides, the integration of Eurodac into the large-scale interoperable IT system could also pose challenges if

functionalities are not delivered on time. The progressive rolling out of further IT systems could address some operational obstacles linked to the implementation of the interoperable framework. Yet, it could lead to greater uncertainty in the short to medium term (see Box 1). Relatedly, the Commission's last report on interoperability points to significant progress in the technical development and testing of interoperability components. However, the actual deployment of these tools remains dependent on the progressive roll-out of the EU information systems that rely on them.<sup>37</sup> This means that, in the short to medium term, the benefits of interoperability for identification, including in the context of return procedures, will remain theoretical.

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**Yet, uncertainty is not only due to technical and practical challenges. Reluctance at political level to ready national systems to ensure the functioning of the new rules likewise poses a risk**

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All the above practical and technical challenges could affect the overall progress towards the July 2026 deadline. Should they not be effectively addressed, they could put

at risk the application of the whole system that the Pact foresees.<sup>38</sup> Yet, uncertainty is not only due to technical and practical challenges.

Reluctance at political level to prepare national systems to ensure the functioning of the new rules likewise poses a risk. Ultimately, the application of Eurodac rules and implementation of the Pact requires not only technical readiness, but also political ownership and trust among stakeholders.

While Hungary and Poland have already publicly expressed their unwillingness to implement the Pact, other member states have expressed concerns about solidarity or mandatory procedures at the border specifically. Northern member states remain uncertain whether secondary movements will be effectively addressed, even though they could view a decrease in such movements as a precondition for delivering solidarity. In this context, frontline member states remain sceptical as to whether the promised solidarity will materialise in practice.

This reluctance and, even more so, open defiance undermine mutual trust, which is crucial for the proper functioning of an interdependent system where the effectiveness of one component depends on the commitment of all. Far from only having political consequences, these positions have concrete operational implications, as they disincentivise investments in, for example, border capacities, including to ensure swift screening, registration in Eurodac and subsequent procedural steps.

## 6. Eurodac and data-sharing in the return

Specific implementation challenges could also emerge in the context of return. Among them, the Commission's Common Implementation Plan itself recalled the need to close the loopholes between asylum and return procedures and to digitalise or upgrade national return case management systems, integrating them with broader EU systems. Further challenges should also be examined, however. Some of them are of a general nature, while others may occur should the Return Regulation be adopted as per the Commission's proposal.

In general, much of the personal information recorded on Eurodac will be relevant for the return procedure. This information includes scanned identity documents, the rejection of asylum requests or the end of the right to remain, the granting of assistance for voluntary return or the date an individual was removed or left the member state's territory. However, some of this information could be registered and/or updated only long after the initial entry into the system due to the long data retention period (from five to ten years). And, in certain cases, some of the information could only be obtained by making use of interoperability (e.g. return alerts in the SIS).

While the date of removal or voluntary departure and readmission information should also be registered in the SIS, neither the Eurodac Regulation nor the Return Regulation Proposal explicitly states how Eurodac will interact with SIS in this context.

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**With delays in delivering the interoperable framework, return-related information could remain split across different databases, creating practical challenges for ensuring continuity across procedures.**

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With delays in delivering the interoperable framework, return-related information could remain split across different databases, creating practical challenges for ensuring continuity across procedures.

This fragmentation may ultimately hinder the goal of building a complete and operational migration record for concerned non-EU nationals.

In addition, challenges could also arise with data sharing with authorities in third countries. As mentioned above, the revised Eurodac Regulation only provides limited safeguards in this regard. With the potential execution of removals to third countries through return hubs and the recent safe third country proposal, should the Commission's proposals be adopted, the data sharing clause could become applicable more frequently. Besides the general concern of the limited safeguards, however, the handling of biometric data in return hubs, or more broadly in third countries remains underexamined, especially regarding monitoring, data privacy and legal accountability.

But even if the Return Regulation and safe third country proposal were not adopted, operationally, concerns would remain. Readmission agreements should govern data transfers between EU and third country authorities. Yet, the safeguards included in such agreements are generally not considered comparable to those provided by the EU general data protection framework in force, the European Data Protection Regulation (EUDPR). Furthermore, the EUDPR itself provides derogations for specific situations, allowing transfers of data outside an existing readmission agreement, for reasons of public interest (i.e. the management of irregular migration).<sup>39</sup>

Were such a situation to occur, the data transfer could be hard to execute on a large scale and in a systematic manner.<sup>40</sup> More broadly, the possibility to rely on such a derogation could lead to further concerns.

Previously, the European Data Protection Supervisor (EDPS) had already expressed significant concerns about

this issue, particularly in connection with readmission agreements, which often fail to meet the required EU data protection standards. Considering this, the EDPS called on Frontex and member states to push for stronger clauses and to avoid relying on the derogation clause that the EUDPR provides.

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**The lack of any mention of additional safeguards or guarantees concerning data privacy and fundamental rights regulations in the third country raises serious concerns.**

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Moreover, the lack of any mention of additional safeguards or guarantees concerning data privacy and fundamental rights regulations in the third country raises serious concerns. The risks associated with transferring personal data to third countries go beyond the act of transfer itself. The key issue lies in how these countries may use, store, and allow access to this data. For instance, there could be insufficient restrictions on who can access the data, unclear guarantees regarding data retention periods, and inadequate procedures for individuals to access, rectify, or erase their personal data. Furthermore, the transfer of data to a safe third country may lead to secondary transfers to the country of origin of non-EU nationals, raising additional concerns regarding data protection and privacy.

## 7. Conclusion and forward-looking reflections

No longer solely a system supporting the Union's asylum policy, Eurodac has become a comprehensive instrument for managing migration and return. While its expanded scope reflects the ambition to make Eurodac a central operational tool under the Pact, analysis has shown that such ambition is also confronted by legal and practical questions and challenges. These include delays in the roll-out of interoperability which will lead to the fragmentation of information, unresolved tensions between operational objectives and rights-based safeguards, and insufficient investments by some member states, which may prevent the development of the national infrastructure required to fully use the new functionalities. There is a risk that these issues may compromise the effectiveness of the new system and the expected gains in terms of efficiency, coordination and data quality.

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**While its expanded scope reflects the ambition to make Eurodac a central operational tool under the Pact, analysis has shown that such ambition is also confronted by legal and practical questions and challenges.**

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Looking ahead, as outlined in this Discussion Paper, the effective delivery of the revised Eurodac system will require more than technical readiness. Its success will ultimately depend on coordinated implementation

that ensures operational objectives are met without compromising data protection and fundamental rights. Building on the analysis outlined in this paper, this chapter sets out recommendations to EU and policymakers aiming to support a more balanced and effective framework for data management in migration.

- ▶ **Ensure coordinated and timely implementation of the new Eurodac system.** Given its central role in the architecture of the Pact, failure to enforce Eurodac rules could lead to broader implementation delays or undermine the new system. Considering the potential for migration to become a bone of contention among member states again, this is not an option. Member states should prioritise the timely completion of procurement processes, staff training, and integration of Eurodac into national systems, where applicable. The Commission and eu-LISA should monitor progress closely and provide tailored support to countries facing technical or administrative bottlenecks. A coordinated EU-level implementation mechanism should ensure consistency and interoperability across member states, while promoting accountability and transparency.
- ▶ **Safeguard fundamental rights and address vulnerabilities.** Upholding safeguards and monitoring of fundamental rights will be of paramount importance in the implementation of the Pact reforms. Accordingly, the collection of biometric data from the age of six should be carried out in full respect of fundamental rights. Moreover, vulnerabilities or specific procedural needs should be identified at the earliest possible stage and considered in every step of the procedures. In this regard, an opportunity was missed to require the registration of vulnerability indicators and age assessment outcomes, which could have advanced convergence among member states in these areas. Besides, the persons registered in the system should have a full understanding of their rights to access, erase or correct their personal data and should be properly informed as recommended by the EU Agency for Fundamental Rights (FRA) in its respective guidelines.<sup>41</sup>

- ▶ **Ensure high quality standards in recording data across time.** For the new system to function as envisaged, national authorities must not only ensure that data is registered appropriately and accurately. They must also ensure that it remains reliable and is updated over time. This will be particularly important for cases where data is reused for different purposes, including when shared with third countries as part of the return procedure.
- ▶ **Ensure guarantees from partner countries on data handling.** Transfer of data to third countries should only be done when clear commitments and guarantees to protect data and their integrity are provided. Other than this, before any data sharing, the data protection officer – in cases of the involvement of EU agencies or national authorities – should assess the data protection framework in the third country concerned, paying particular attention to retention, access by foreign authorities as well as the right to consult, erase and correct the data for the person concerned. The ongoing negotiations on the proposed Return Regulation could provide an opportunity to strengthen these safeguards in the context of data-sharing with third countries.
- ▶ **Review the data protection clause in existing and future readmission agreements, ensuring clearer provisions on data access, retention, and rectification.** To ensure compliance with data protection standards, the opinion of the EDPS on data sharing could be followed. Specifically, data could be made accessible only to authorised authorities, and safeguards could be introduced to prevent misuse, ensure minimal retention periods, and allow individuals to exercise their rights.

- <sup>1</sup> While the Eurodac Regulation uses the term 'third-country national', the European Policy Centre generally prefers the term 'non-EU national' in its publications.
- <sup>2</sup> See also: De Bruycker, Philippe (2024), "The New European Solidarity Mechanism: Towards a fair sharing of responsibility between member states?"; Policy Study, Brussels: Foundation for European Progressive Studies, Friedrich-Ebert-Stiftung and European Policy Centre.
- <sup>3</sup> European Commission, Europe's Choice: Political Guidelines for the next European Commission 2024–2029, Brussels, pp. 16–17.
- <sup>4</sup> Joint Letter on new solutions to address irregular migration to Europe, 15 May 2024, available [here](#).
- <sup>5</sup> European Council Conclusions, 17 October 2024.
- <sup>6</sup> Proposal for a Regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC, COM/2025/101 final.
- <sup>7</sup> See Article 50, Regulation (EU) 2024/1358 on the establishment of 'Eurodac' for the comparison of biometric data in order to effectively apply Regulations (EU) 2024/1351 and (EU) 2024/1350 of the European Parliament and of the Council and Council Directive 2001/55/EC and to identify illegally staying third-country nationals and stateless persons and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, amending Regulations (EU) 2018/1240 and (EU) 2019/818 of the European Parliament and of the Council and repealing Regulation (EU) No 603/2013 of the European Parliament and of the Council.
- <sup>8</sup> See article 17, *op.cit.*
- <sup>9</sup> European Commission, Common Implementation Plan for the Pact on Migration and Asylum, Brussels, COM(2024) 251.
- <sup>10</sup> European Commission, State of play on the implementation of the Pact on Migration and Asylum, 11 June 2025, COM(2025) 217 final.
- <sup>11</sup> Biographic information are sex, place and date of registration of application for international protection, member state of origin, date on which the fingerprints are taken, date of transmission to the Central System, operator ID and date of arrival after a transfer (for Dublin cases). In the context of the Eurodac Regulation, the term "member state of origin" refers to the member state which transmits the personal data to the Central System of Eurodac.
- <sup>12</sup> Regulation (EU) No 604/2013 of the European Parliament and of the Council of 26 June 2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person (recast)
- <sup>13</sup> The overall recognition rate for asylum applications in the EU+ dropped to 39% in 2018, a decrease of seven percentage points from the previous year. This decline was influenced by an increasing number of applicants from countries with lower recognition rates, particularly from the Balkans. By 2019, the recognition rate had stabilised at 33%, but significant variations remained across nationalities. For example, Venezuelans had a recognition rate of 96%, while nationals from countries like Georgia saw a much lower rate, as low as 4%. These variations highlight the impact of nationality on recognition outcomes, with some countries having significantly higher recognition rates than others. (see European Union Agency for Asylum (EUAA), Annual Report 2018 & 2019).
- <sup>14</sup> Regulation (EU) 2024/1348 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013
- <sup>15</sup> European Union Agency for Fundamental Rights, Age assessment and fingerprinting of children in asylum procedures, Minimum age requirements concerning children's right in the EU, 2018, p.14.
- <sup>16</sup> Article 50, *op.cit.*
- <sup>17</sup> Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) 2024/1348 as regards the application of the 'safe third country' concept, 2025/0132 (COD)
- <sup>18</sup> Common Implementation Plan, *op.cit.*, p.7.
- <sup>19</sup> See also: Tsourdi, Evangelia (Lilian) (2024), "The new screening and border procedures: towards a seamless migration process"; Policy Study, Brussels: Foundation for European Progressive Studies, Friedrich-Ebert-Stiftung and European Policy Centre.
- <sup>20</sup> Common Implementation Plan, *op.cit.*, p.4.
- <sup>21</sup> Explanatory memorandum of amended proposal on Eurodac, Brussels, 23 September 2020, COM(2020) 614 final, 2016/0132(COD).
- <sup>22</sup> The Annual Migration Management Cycle is a framework introduced in the Asylum and Migration Management Regulation (AMMR). It aims to assess and plan migration management on an annual basis, reviewing migration trends, member states' capacities, and the solidarity measures needed, such as relocation or financial support through the Solidarity Pool.
- <sup>23</sup> This is because the system will not be operational by this point in time.
- <sup>24</sup> Recital 16 of Regulation (EU) 2024/1358, *op.cit.*
- <sup>25</sup> Regulation (EU) 2019/817 establishing a framework for interoperability between EU information systems (borders and visa) and Regulation (EU) 2019/818 establishing a framework for interoperability between EU information systems (police and judicial cooperation, asylum and migration).
- <sup>26</sup> Press release, Commission sets the launch date for the Entry/Exit System to 12 October 2025, 30 July 2025, available [here](#).
- <sup>27</sup> European Commission, Commission Staff Working Document – Accompanying the Proposal for a Regulation establishing a common system for returns in the Union (Return Regulation), SWD(2025) 218 final, Brussels, 14 May 2025.
- <sup>28</sup> European Commission, Communication on a New Pact on Migration and Asylum, COM(2020) 609 final.
- <sup>29</sup> Directive 2008/115/EC on common standards and procedures in Member States for returning illegally staying third-country nationals, CONS/2008/3653.
- <sup>30</sup> European Migration Network (EMN) (2017), "The effectiveness of return in EU Member States: challenges and good practices linked to EU rules and standards – Synthesis Report"; Brussels, p. 87.
- <sup>31</sup> The EU's return rate was 38% in 2015, rising to 47% in 2016, and then falling to 36% in 2018, 33% in 2019 and to 25% in 2020 and stand today at around 20% (Eurostat data).
- <sup>32</sup> Regulation (EU) 603/2013 on the establishment of 'Eurodac' for the comparison of fingerprints for the effective application of Regulation (EU) No 604/2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, and amending Regulation (EU) 1077/2011 establishing a European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (recast). PE/2008/0243/COD.
- <sup>33</sup> See Neidhardt, Alberto-Horst (2024), "The Crisis and Force Majeure Regulation: Towards future-proof crisis management and responses?"; Policy Study, Brussels: Brussels: Foundation for European Progressive Studies, Friedrich-Ebert-Stiftung and European Policy Centre.
- <sup>34</sup> Common Implementation Plan, *op.cit.*
- <sup>35</sup> Common Implementation Plan, *op.cit.*
- <sup>36</sup> State of play on the implementation of the Pact on Migration and Asylum, *op.cit.*
- <sup>37</sup> European Commission, Report on the state of play of preparations for full implementation of the Interoperability Regulations in accordance with Article 78(5) of Regulation (EU) 2019/817 and Article 74(5) of Regulation (EU) 2019/818, COM(2025) 162 final.
- <sup>38</sup> European Commission, State of play on the implementation of the Pact on Migration and Asylum, 11 June 2025, COM(2025) 217 final.
- <sup>39</sup> Article 49(1)(d) of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation).
- <sup>40</sup> European Data Protection Supervisor, Opinion on international transfers of personal data by Frontex in the context of return operations (Case 2021-0856), 20 December 2021.
- <sup>41</sup> EU Fundamental Rights Agency (FRA), Right to information - Guide for authorities when taking fingerprints for Eurodac, Leaflet, 2020.

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The **European Migration and Diversity** programme provides independent expertise on European migration and asylum policies. The Programme's analyses seek to contribute to sustainable and responsible policy solutions and are aimed at promoting a positive and constructive dialogue on migration. The programme follows the policy debate by taking a multidisciplinary approach, examining both the legal and political aspects shaping European migration policies. The analysts focus, amongst other topics, on the reform of the Common European Asylum System; the management of the EU's external borders; cooperation with countries of origin and transit; the integration of beneficiaries of international protection into host societies; the links between migration and populism; the development of resettlement and legal pathways; and the EU's free movement acquis. The team benefits from a strong network of academics, NGO representatives, and policymakers, who contribute regularly to publications and policy events.

The **Odysseus Academic Network** is a network of experts in European immigration and asylum law and policy. It was founded in 1999 by Philippe de Bruycker, Professor at the Institute for European Studies of the Université Libre de Bruxelles (ULB), initially with the financial support of the European Commission. The Network brings together legal experts from all EU Member States, Schengen associated States (Norway, Switzerland, Iceland), as well as Turkey. Its coordination team is based in Brussels. The Network and its members provide comprehensive scholarly analysis of European law and policy; undertake consultancies for EU institutions; support the studies of the European Migration Network (EMN); organize European thematic conferences; publish scientific and policy outputs at European and national levels; communicate and co-create research with policy-makers; run a widely read blog that analyses legal and policy developments; and, undertake training in these fields, most notably through a well-established annual summer school held in Brussels and a certificate program combining long-distance learning with residential elements.

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