

EXECUTIVE SUMMARY

RECOMMENDATIONS FOR IMPLEMENTING THE EUROPEAN PACT ON MIGRATION AND ASYLUM WITH A PROTECTION- AND HUMAN RIGHTS-BASED APPROACH

CEA(R)

Comisión Española
de Ayuda al Refugiado

This publication was coordinated by the
Research and Education Service of the
Advocacy Department of the Spanish
Commission for Refugees (CEAR).

The following people contributed to writing it: Nuria
Díaz, Elena Muñoz, Verónica Laorden, Clara
Sánchez-Calero, Mónica López, Mauricio Valiente,
Carmen Ruiz e Irene Graíño.

LAYOUT: Erreka Multimedia S. Coop.
PRINTING: Arcrom Publicidad S.L.

CEAR HEADQUARTERS.
GTA. DE CUATRO CAMINOS, 6-7, Planta 7ª-
711. 28020 MADRID
Tel.: 91 598 05 35
Fax: 91 597 23 61
WWW.CEAR.ES



ATTRIBUTION - NONCOMMERCIAL (CC BY-NC-ND):
THE PRODUCTION OF DERIVATIVES IS PERMITTED
SO LONG AS THEY ARE FOR NONCOMMERCIAL
PURPOSES. THE ORIGINAL MAY NOT BE USED FOR
COMMERCIAL PURPOSES.

The Spanish Commission for Refugees (CEAR) is a non-profit organization founded in 1979 and engaged in voluntary, humanitarian, independent and plural action. Our aim is to work with citizens to defend the right to asylum. Our mission is to defend and promote human rights and the comprehensive development of asylum applicants, refugees, stateless persons and migrants in vulnerable situations and/or at risk of social exclusion. Our work approach is comprehensive, including temporary shelter, legal care, psychological and social care, training and employment, and advocacy and social participation.

Sponsored by:



SECRETARÍA
DE ESTADO
PARA LA UNIÓN EUROPEA

RECOMMENDATIONS FOR IMPLEMENTING THE EUROPEAN PACT ON MIGRATION AND ASYLUM WITH A PROTECTION AND HUMAN RIGHTS-BASED APPROACH

The arrival of one million refugees to the European Union, mainly from Syria in 2015, and the forced displacement of thousands of people fleeing war and conflict marked a turning point in Europe and laid bare the deficiencies of the Common European Asylum System (CEAS) and the urgent need to reform it under the principle of solidarity and shared responsibility among Member States. However, the political will to comply with relocation commitments came up short and border externalization agreements, such as the one signed with Turkey, abounded. This led to the defeat of the CEAS reform in 2016.

In September 2020, the European Commission presented the New European Pact on Migration and Asylum aimed at reforming and building a true Common European Asylum System. After years of difficult negotiations, the Pact was approved in May 2024. However, a two-year transitional period has been established to implement it due to the complexity and interrelation of the new regulations. This marks the beginning of a new phase of implementation of the Pact, during which Member States must prepare their asylum systems and adapt them to the new European standards.

On 12 June 2024, the European Commission presented the Common Implementation Plan for the Pact. This plan comprises 10 interconnected building blocks covering Member States' main obligations to adequately implement the Pact. Member States must now have until 12 December 2024 to prepare their respective national implementation plans. Although CEAR has expressed its disagreement with the approach to the negotiations and the outcome of the Pact, it believes that Spain should be a leader in the process of change in European migration and asylum policies to prioritize the protection and rights of migrants and refugees. Therefore, CEAR presents the following recommendations aimed at ensuring that Spain takes a supportive approach to implementing the European Pact on Migration and Asylum, based on safeguards and focusing on the rights of migrants, asylum seekers, and refugees, with total respect for international law and human rights.

Block 1: Eurodac

The collection of biometric data is linked to algorithmic biases that could be used to discriminate against and stigmatize migrants and refugees. It is also concerning that coercion may be used to take the fingerprints of children up to age 6. Although the use of force is prohibited in such cases, the pact refers to the concept of a “proportionate degree of coercion” but does not clearly define it. This could lead to abuse and jeopardize the integrity of children subjected to this procedure. CEAR does not believe the pact includes enough safeguards to protect the digital rights of migrants and refugees. Given the risk of violating fundamental rights and increased criminalization of migrants and refugees, CEAR proposes the following measures, among others:

- Limit the request for biometrics to fingerprint data and exclude facial biometrics.
- Strictly limit personal data checks for the purposes of preventing, detecting, and investigating serious crimes under the criteria of necessity, suitability, and proportionality when there is specific and well-founded evidence.
- Establish alternatives to coercive measures that are less injurious to people's rights. Apply such measures as a last resort and in a consistent and systematic manner to gather biometric data.
- Guarantee the right to information; ensure that the people impacted know and understand the data being collected and why the data processing is necessary by preparing informative leaflets written in clear, comprehensible language, translated into the main languages of the people who enter Spain and, failing that, with the assistance of an interpreter.
- Establish an independent mechanism for overseeing and monitoring that fundamental rights are respected (see block 9). This mechanism must also

cover respect for people's dignity and physical integrity during the collection of biometric data.

- Ensure that fingerprinting and facial images of children are taken on an individual basis after assessing the best interests of the child. They should always be taken by unarmed, non-uniformed personnel who are not carrying intimidating artifacts and who have been trained in human rights, childhood, and intersectionality.
- Comply with the principle of data purpose limitation and minimization by justifying data processing individually and establishing exhaustive control over the legality of personal data processing to safeguard the right to privacy and data protection.

Block 2: Management of external borders and border procedures

All persons entering European territory irregularly will be registered and subject to a screening of their identity, security risk, vulnerability, and health. Based on this information, the person will be directed either to a border asylum procedure or a return procedure, depending on whether or not there is a presumed need for protection. Both procedures are less protective and faster than the current ones.

Conducting a check (screening) prior to channel asylum applications is a way of delaying access to the procedure (and all its safeguards) since applications will not be registered until the check is complete. Furthermore, a legal fiction of “no entry” is established during screening and border procedures, which may jeopardize respect for fundamental rights. In this regard, the ECHR's jurisprudence establishes that, where a State Party exercises its jurisdiction, even extraterritorially, it must guarantee all the rights of the ECHR. Therefore, from the moment a person arrives at a European border and expresses their desire to request international protection, their rights must be immediately guaranteed by registering their asylum application.

According to the regulations, Member States must also ensure that migrants remain at the disposal of the authorities throughout the process, limiting unauthorized entry and movement. This represents a risk of excessive reliance on freedom-restricting measures, which should only be applied as a last resort. Therefore, CEAR proposes the following measures, among others:

- Ensure immediate access to the international protection procedure during screening from the moment a person expresses their desire to apply for asylum by registering their application as soon as possible and within 24 hours at most.
- Ensure adequate provision of resources (technological, material, economic, and human) so the screening procedure can be conducted as quickly as possible and at most within 72 hours.
- Ensure preliminary vulnerability screening: screening authorities should be supported by specialized NGOs, offer support services to vulnerable individuals at screening sites, and immediately refer persons to existing protection procedures when there is even the slightest evidence of vulnerable situations.
- Plan for an appropriate place for screening, ensuring that asylum seekers can enjoy all the reception rights and conditions established in the Reception Directive. Under no circumstances should it be carried out at immigration detention facilities.
- Maintain the standards and safeguards laid out in Spanish legislation for persons in screening (free legal assistance, right to an interpreter, health care, information, to be heard, and an effective appeal). Ensure access to urgent health care, including mental health and chronic diseases. Provide intercultural mediation services and unlimited access to legal counsel.

- Ensure adequate training of screening personnel in human rights from a childhood perspective, gender, diversity, and intersectionality perspective.
- Establish an independent mechanism for overseeing and monitoring that fundamental rights are respected (see block 9) and which includes remit in the supervision thereof during screening.
- Apply the border asylum procedure restrictively since it provides fewer guarantees: exclude persons in particularly vulnerable situations from the procedure, apply the most favorable criterion of the principle of family unit and when the deadlines for registration, formalization, or appeal of the procedure are not met, the asylum application must be immediately transferred to an ordinary procedure.
- Establish alternatives to detention in Spanish legislation and ensure that deprivation of liberty does not occur during screening and border procedures.
- Guarantee the rights of persons under the responsibility of the Spanish authorities, even if the legal fiction concept of “no entry” is applied.
- Always guarantee the right of asylum seekers to remain during the administrative procedure and make no exceptions based on vague legal concepts such as “danger to national security and public order”.
- Provide updated public information on the figure considered to be “adequate capacity”, resort to the possibility of suspending border procedures and channeling the remaining applications through the ordinary procedure once adequate capacity has been reached; and ensure compliance with the mandatory criteria.

Block 3: Reception systems

Member States must ensure that material reception conditions offer applicants an adequate standard of living, and access to health care, and include all the improvements of the new Directive in the areas of integration in the workplace, education, and health. This is a key factor in determining whether a Member State is “well prepared” to respond to crisis situations and able to activate solidarity measures.

The Directive improves upon the rights recognized by the Reception Conditions Directive in general (right to information, right to documentation, etc.). However, the severe restrictions on freedom of movement that Member States may impose are concerning, as they have very serious consequences, such as limiting reception conditions. Moreover, the Directive limits access to employment in most cases of accelerated procedure (which is also expanded in the Procedure Regulation) and undermines access to this right, which is essential for the integration and autonomy of international protection applicants. It is concerning that the Directive broadens the circumstances in which Member States may detain international protection applicants, although it does not require them to do so. Therefore, Spain must opt for less harmful alternative measures and avoid the detention of minors and people in vulnerable situations in all cases.

To implement the new features of the Directive and ensure these material conditions, CEAR recommends the following measures, among others:

- Clearly delineate the criteria for defining the concept of “adequate standard of living” at an internal level in accordance with the CJEU ruling.
- Expand specific protocols to prevent violence of all types in cases where they are not operational (for religious, racist, LGTBIQ+, childhood reasons, etc.) with clear measures and accessible information.

- Maintain the current practice of establishing inclusion itineraries for international protection applicants without imposing mandatory integration activities with which failure to comply could limit or reduce reception conditions. In the event of abandonment, participants should be allowed the possibility of re-entry at the same phase they were in.
- Establish a protocol for assessing specific needs from the moment the international protection application is made and a tool to assess the best interests of the child in the case of unaccompanied minors, while adapting the reception conditions to their needs.
- Create safe spaces at reception centers for women, children, LGTBQ+ people, and other members of particularly vulnerable groups.
- Maintain and expand the rights and freedoms of international protection applicants (right to information, freedom of movement, right to employment, education, health, and housing, among others) in accordance with the Reception Directive.
- Apply the concept of the risk of absconding in a restrictive and exceptional manner, avoiding arbitrary and discretionary decisions and making an interpretation appropriate to the situation of vulnerability and the protection needs of the individuals.
- Establish less harmful alternative measures: avoid the detention of minors and people in vulnerable situations in all cases. As for detention, it must not occur in penitentiary centers, and access to civil society organizations must be ensured. Furthermore, ensure that the guarantees established for detention also apply in airport and border transit areas.
- Include the expanded concept of “family members” in internal regulations and apply broader and more flexible criteria to assess the family unit.

Block 4: Fair and efficient asylum procedures

The new regulations expand on the circumstances in which Member States must examine new asylum applications using special procedures with fewer safeguards and shorter time limits. These procedures introduce discriminatory criteria based on nationality, which jeopardizes the individual analysis of applications.

In the ordinary international protection procedure, the extension of the registration period in the event of a disproportionate number of applications leads to delayed access to the procedure for persons subject to the control procedure. Likewise, the mandatory application of the accelerated procedure and the expansion of cases means the majority of applications will be processed through such procedures, in which it is not possible to adequately assess international protection applications or detect situations of special vulnerability.

It is also alarming that border procedures are now mandatory in circumstances in which very many asylum seekers find themselves and under vague legal concepts such as “threat to national security and public order”, in addition to the inclusion of discriminatory criteria based on nationality. On the other hand, the concept of adequate capacity results in differential treatment of applicants depending on whether they arrived before or after exceeding “adequate capacity”. The presumption that a third country is “safe” if it is a signatory to a bilateral agreement with the EU or if it is included in a national or community list of “safe countries” is very serious.

Therefore, CEAR proposes the following measures, among others:

- Create a single administrative structure dependent on the Ministry of the Presidency that unites all powers in matters of asylum and refuge. This structure must have decision-making and management capacity, as well as the necessary budget for operating and mechanisms for consultation and participation of civil society.

- Implement specialized and ongoing training for judges and provide them with sufficient resources (technical, human, and technological) to carry out their work correctly within the time limits established in the new European regulations.
- Maintain and expand the Reception, Care and Referral Centers (CREADE) as spaces for registration, documentation and access to the procedure and the “one-stop shop for asylum” for all international protection applicants regardless of their place of origin.

Regarding the ordinary asylum procedure:

- The asylum law must include the option to file an asylum application by any legal means and maintain the option of using a form to submit the application if it is impossible to be physically present, with subsequent ratification.
- Use clear and specific criteria to define a “disproportionate number” of applicants, distinguishing it from other concepts such as “migratory pressure”. Ensure that authorities other than the decision-makers are allowed to carry out interviews solely in this case, as an exception.
- Grant NGOs and civil society access to CIEs and border areas without requiring prior agreements with the authorities that go beyond prior communication and identification.
- Take into account the UNHCR's criteria for reasonableness when evaluating the internal flight alternative in the asylum application assessment procedure.
- Do not reject an international protection application based on needs that have arisen since following assessment of the applicant's intention to “create” these new circumstances.

Regarding special international protection procedures:

- Maintain the guarantees of the ordinary asylum procedure for accelerated procedures, border procedures and subsequent applications.
- Apply the border procedure only in strictly necessary, mandatory and limited cases, after individualized analysis and without discrimination based on nationality.
- Apply the jurisprudence of the Supreme Court (SCS 27 March 2013) solely to process allegations that are “obviously and patently” implausible through the accelerated procedure.
- The burden of proof must be assumed to demonstrate the “bad faith” of the applicant in accelerated procedures, taking into account the protection needs that arise sur place due to the immediate absence of the asylum applicant.
- Assess the applicant’s individual circumstances when applying the criterion of the protection recognition rate by nationality to channel applications through the accelerated procedure, must be assessed.
- Refrain from creating a national list of safe countries and applying this concept in border or accelerated procedures, as they are less protective.

Block 5: Returns

The new legislation aims to expedite and increase the expulsion of those not deemed in need of protection through a single asylum and return procedure, cooperation with third countries, and the incentive of voluntary return through readmission and reintegration programs.

Specifically, Member States must ensure that individuals are effectively returned after being denied asylum, whether that return is voluntary or forced. This requires them to issue the return decision alongside the asylum refusal or shortly thereafter. Thus, any appeal against these decisions must be handled jointly or in a short period. Additionally, Member States are encouraged to consult Frontex on return, reintegration, and collaboration to facilitate these processes.

In the case of forced returns, Member States must ensure adequate infrastructure to keep persons subject to return at the disposal of the authorities, allowing detention for up to 12 weeks, extendable to 16 in crisis situations. If the return is not achieved within this period, then they must resort to the ordinary procedure with a maximum detention period of 6 months. Unfortunately, there is no guarantee that detention will not be used systematically. The extended detention periods in crisis situations not only applies to persons who have been denied international protection during the crisis or force majeure period but also to those who had previously been denied asylum and were awaiting return when the crisis situation was declared.

Given the risks of applying the Regulation, CEAR makes the following recommendations:

- Ensure the right to an effective appeal and establish safeguards in national legislation for the automatic suspension of returns during the appeal filing period until the appeal is resolved.
- Ensure alternative measures to detention and establish clear criteria for assessing the need and reason for detention.

- Maintain the 60-day maximum confinement period even in crisis situations.
- Improve voluntary return programs to ensure returnees receive support for their reintegration and that their rights are respected throughout the process.
- Refer those interested in undertaking a business project related to returns to special productive return programs.

Block 6: Determining the responsible Member State (Dublin)

In replacing the Dublin Regulation, the new Asylum and Migration Management Regulation in the European Union aims to improve the distribution of responsibilities among Member States in the management of asylum applications. Although it includes changes, such as the possibility of other States assuming responsibility in certain cases (for example, if the applicant has relatives or qualifications in another country), the first-country-of-entry criterion is maintained. This maintains disproportionate pressure on bordering countries such as Spain. The regulation incorporates new provisions limiting the transfer of liability between Member States and streamlining procedures with shorter timeframes. However, it also establishes consequences for applicants who do not remain in the assigned Member State, such as restricting reception conditions. This contravenes the CJEU ruling that establishes that application of the Reception Directive must be guaranteed until the time of transfer. It is also highly concerning that asylum seekers are deprived of reception conditions in the event of “absconding” or making a secondary movement.

In terms of migration management, a distinction is made between an internal dimension, which promotes cooperation and solidarity between Member States, and an external dimension, which focuses on border externalization through agreements with third countries, leaving the creation of safe, legal routes for

protection applicants in the background. Despite some improvements in coordination and procedures, there are still flaws in the system that do not ease the burden on border states or fully protect the rights of asylum seekers.

In light of the changes introduced by the new Asylum and Migration Management Regulation, which replaces the Dublin Regulation, CEAR recommends the following points:

- Ensure a reception-based asylum and migration management system that is well prepared and sized and has a structural rather than occasional and preventive approach to address emergencies and reception needs.
- Ensure consistency with the recommendations of the Ombudsman, especially those aimed at solving the collapse of the online appointment system and existing obstacles to accessing the international protection procedure.
- Expand safe legal pathways for those in need of protection, including clauses on respect for human rights in cooperation and migration management agreements signed with third countries.
- Strengthen the Asylum and Refugee Office (ARO) by increasing the provision of material, human and technological resources, ensuring ongoing training in asylum and human rights, and hiring more professionals in key areas such as application evaluation, mediation, interpreting, and psychological support, and strengthening the department specialized in country of origin information reports (COI), among other measures. Focus on prioritizing protection measures, strengthening the capacities of the reception system, and making greater commitments to relocation.
- As for the responsibility for examining asylum applications, refrain from withholding the right to reception due to non-compliance with the obligations of asylum seekers, relax the requirements for obtaining study visas and promote access to educational and training programs, apply family reunification criteria broadly and flexibly, be somewhat flexible when assessing the documentation

submitted, considering the unique difficulties that asylum seekers face.

- Promote effective coordination during readmission between the Member States of transfer and readmission to prevent creating situations in which transferred persons are unprotected; guarantee adequate information exchange with special focus on vulnerable situations.
- Maintain the guarantees and rights of asylum seekers during the procedure for determining the responsible Member State. Specifically, regarding the right to information, ensure there is free legal counsel and safeguards for children and adolescents.

Block 7: Solidarity

The Regulation establishes a mandatory but flexible mechanism for solidarity. Member States can choose what kind of contributions they make from relocations of international protection applicants or beneficiaries, financial contributions to support actions in other Member States and third countries, or alternative measures. In light of this, CEAR proposes the following measures:

- Prioritize solidarity measures focused on protecting people and strengthening the reception system.
- Relocation procedure: the sovereignty clause must be applied and the asylum application of a person relocated from a Member State must be examined to prevent transfer to a third State and to ensure, in any case, that all existing links with another Member State are considered before proceeding with the relocation. Include a specific and detailed assessment of vulnerability in the relocation interview, with clear and non-exhaustive indicators. Likewise, ensure that all relocations are conducted with prior written consent, providing information that has been adapted to the specific needs of the affected person and ensuring the assistance of an interpreter.

Block 8: Contingency measures, preparedness and crisis response

Contingency measures in migration crisis situations aim to ensure that Member States are prepared to respond effectively to emergencies. This requires sufficient human, material, and financial resources, as well as adequate infrastructure and coordination. States must develop National Contingency Plans by 2025, conduct regular reviews, and coordinate with key social organizations.

In situations of crisis or force majeure, the Crisis Regulation stipulates that Member States may request temporary repeals from European asylum regulations that delay and hinder access to the international protection procedure, in addition to creating a parallel asylum system for situations with fewer guarantees and serious risks to people's fundamental rights. Assessment of such circumstances may lead Member States to make broad, discretionary interpretations that allow them to evade their asylum obligations. The definition of the concepts of “crisis”, “force majeure” and “instrumentalization” include unspecified notions such as “well prepared Member State”, “abnormal and unforeseeable circumstances outside a Member State’s control”, “destabilizing the Union or a Member State”, “putting at risk essential functions including the maintenance of law and order or the safeguard of its national security”. Because these concepts are not clearly defined, Member States can interpret them at their discretion. Similarly, the indefinite concept of “hostile non-state actor that encourages or facilitates movement” can be used to criminalize human rights organizations that work with migrants or refugees or that carry out humanitarian rescue and salvage work at sea.

In light of the provisions of this Regulation, CEAR recommends the following:

- Devote all Pact implementation efforts to ensure a stable, sufficient, and well-prepared system to respond to migration challenges and guarantee rapid and effective access to protection.

- Prioritize the development of realistic contingency plans and include organizations that work in the reception of international protection applicants.
- Limit the use of the concept of “instrumentalization” of migration and explicitly exclude organizations working in humanitarian assistance from the concept of “hostile non-state actor that encourages or facilitates movement.”
- After assessing the repeals and their impact on the rights of individuals, all asylum applications should be processed through the ordinary procedure when the measures in the National Contingency Plan are not sufficient to address the crisis situation. Likewise, refrain from using the repeal to extend the maximum time for the border return and asylum procedure in situations of crisis or force majeure.
- Permanently halt transfers to the Member State in crisis that has been determined responsible for examining the request, applying the discretionary clause of sovereignty so that the other Member State assumes responsibility for studying the case.
- Do not apply repeals except when strictly necessary to address a crisis for a maximum of one year, with regard to the duration of exceptional measures in situations of crisis or force majeure.

Block 9: Legal safeguards, protection in vulnerable situations, and monitoring

This cross-cutting building block aims to bolster protection and ensure compliance with the rights and guarantees of international protection applicants, especially those with specific needs such as unaccompanied minors, families with children, single women, and mothers. Member States must ensure access to information, legal counsel, legal assistance, interpreting, and an effective appeal, although the latter does not always have an automatic suspensive effect. Member States must also ensure the early identification of special needs and only use detention as a last resort.

However, the penalties for applicants who fail to comply with the new, broader obligations imposed on them is concerning. Furthermore, asylum seekers' right to remain is restricted by the exceptions established, including new cases in which undefined legal concepts are applied ("danger to national security and public order"), which may lead to broad interpretations and, ultimately, expulsion. Expanding the situations in which accelerated procedures and even border procedures can be applied to minors, entailing the possibility of detention or arrest, represents a serious setback.

Therefore, CEAR proposes the following measures:

- Ensure full compliance with all the safeguards of the international protection procedure throughout the entire procedure, both in the ordinary and accelerated procedures, border procedures, and applications submitted posteriorly. Additionally, establish a protocol for the individualized evaluation of specific needs.
- Ensure all the safeguards of the international protection procedure in applications submitted by minors, applying a childhood perspective and prioritizing the best interests of the child. Likewise, exclude all minors from border and accelerated procedures and guarantee their participation

and right to be heard in all matters affecting their rights.

- Ensure the participation of unaccompanied minors and their right to be heard in all matters affecting their rights. Spain must implement streamlined procedures to appoint, within 15 days, legal guardians to accompany minors through the asylum procedure and temporary representatives in the meantime.
- Establish the independent mechanism for monitoring compliance with fundamental rights as stipulated in the Screening and Asylum Procedures Regulations for all monitoring and control activities at the external borders. Its operations should include the involvement of the Ombudsman, the European Agency for Fundamental Rights, the UNHCR, and civil society organizations with the mandate to investigate and propose sanctions in the event of violations of fundamental rights at the borders and active legitimacy to refer these violations to the corresponding criminal or civil procedures.

Block 10: Resettlement, inclusion, and integration

This building block addresses the need to expand safe legal pathways to provide international protection, focusing on increasing resettlement commitments and improving access to rights and social inclusion for refugees. The new EU Resettlement and Humanitarian Admission Framework aims to unify and structure the process, establishing two-year plans and prioritizing people in the most vulnerable situations. However, participation in this resettlement framework is not binding, which may limit its scope if Member States are unwilling to participate and comply with these programs. Therefore, CEAR recommends the following measures:

- Make ambitious resettlement commitments in the two-year European resettlement plans, ensuring complementarity with national plans.

- Focus on the protection needs of individuals when prioritizing resettlement applications.
- Apply only the refusal criteria established by the Geneva Convention.
- Notify the affected persons of the decision granting or denying resettlement and guarantee their right to an effective appeal.
- Guarantee access to rights and social inclusion for refugees: bolstering safeguards in the areas of equality and non-discrimination, education, employment, social security, housing, documentation, family extension and also opting for equal rights in refugee status and subsidiary protection.

CEA(R)

Comisión Española
de Ayuda al Refugiado

Sponsored by:



MINISTERIO
DE ASUNTOS EXTERIORES, UNIÓN EUROPEA
Y COOPERACIÓN

SECRETARÍA
DE ESTADO
PARA LA UNIÓN EUROPEA