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Following the request for written contribution on FRONTEX role in implementation of the EU Strategy on Voluntary Return and Reintegration (CM 3956/21), delegations will find in Annex compilation of replies received from EU Member States and Schengen Associated Countries.

**Written comments submitted by the Member States and
Schengen Associated Countries**

**Discussion paper on the FRONTEX role in implementation of the EU Strategy
on Voluntary Return and Reintegration**

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AUSTRIA

Following the IMEX WP on the 6. July, please find below the Austrian comments on the role of Frontex in the implementation of the EU Strategy on Voluntary Return and Reintegration.

To effectively incentivise voluntary return and promote sustainable reintegration, well-established reintegration programmes are needed. Against this background, the ERRIN take-over by Frontex constitutes big potential and should be the top priority. Therefore, the following aspects have to be considered:

1. An uninterrupted continuation of the ERRIN activities has to be guaranteed for the transition period and the time following
2. The core components of ERRIN activities have always been the joint reintegration services. The future JRS set-up should provide Member States with the flexibility needed to identify tailor-made support measures. To unlock the full potential of JRS it is necessary:
 - To offer a broad geographical scope of destination countries (same geographical scope as currently under ERRIN) and target-group specific measures should be made available for reintegration activities in third countries. This includes reintegration support for vulnerable groups, unaccompanied minors as well as third-country nationals legally residing in a Member State.
 - To lower the administrative and financial burden for Member States regarding reintegration support measures in third countries, Frontex should establish a central administrative function and fully cover, coordinate and finance reintegration measures.
 - Member States should not have to establish additional bilateral agreements with different reintegration partners and pre-finance reintegration packages as this has been proven inefficient and could hamper MS use of Frontex reintegration offers

3. As a long-term goal we should aim to incorporate all current ERRIN activities within Frontex (this does not mean that we want to change the ERRIN transfer plan or to limit MS possibilities to engage in GOV2Gov projects)

MS can best contribute with knowledge of their national return experts and authorities. To harvest the full potential of MS expertise, this knowledge has to be at the center of a well-informed decision-making process at management level.

Therefore, AT suggests dedicate parts of the Management Board to return and ensure that experienced national return authorities are present. MS should be encouraged to nominate return experts as members of the MB.

BULGARIA

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

We believe that among the measures proposed in the Strategy, priority should be given to coordinating existing instruments and programs for voluntary return and reintegration in order to avoid duplication of activities and improve the use of the available resources. We believe that special attention shall be given not to new procedures that unnecessarily burden MS, but to cooperation with third countries. In this regard, we support the approach of the European Commission to work with priority third countries in the field of return and reintegration as part of building comprehensive, balanced, needs-based and mutually beneficial partnerships in the field of migration. Priority should also be given to capacity building in third countries for the planning and implementation of voluntary return programs and reintegration.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

Our expectations are that Frontex, as one of the main actors and in compliance with its extended mandate, shall contribute to improving return and reintegration. In terms of reintegration, currently the Agency has programs with Ukraine, Armenia, Ethiopia and Brazil, but these countries cover a minimum percentage of Member States' needs. We believe that active consultations and reintegration programs with additional third countries shall be undertaken. Our experience and needs show that voluntary return efforts, and especially reintegration efforts, shall be targeted at countries such as Iraq, Pakistan, Afghanistan, Algeria, Morocco, Egypt, Libya and others. In terms of voluntary return, most of these third countries (Afghanistan, Pakistan, Iran, Iraq, Algeria, Morocco, etc.) issue return documents if the TCN declares willingness to return voluntarily. However, forced return and cooperation with these countries on rapid identification and issuance of travel documents remains a challenge. In this regard, we would like to underline that joint efforts at EU level shall continue in this direction.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

We believe that Member States shall regularly provide up-to-date information in the European information systems on their needs related to return (voluntary and forced) and reintegration. This information shall be used also for statistical and analytical needs and for identifying next steps for managing the common EU system for returns. It is necessary to continue the joint efforts of Member States and Frontex on the full operationalization of the standing corps in order to be able to effectively use all the opportunities that it offers.

THE CZECH REPUBLIC

- 1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?**

Czech Republic considers the successful setting of a high-quality legal and operational framework to be very important. We see the approval of the recasted Return Directive as essential in this respect. Reliable funding of the assisted voluntary return and reintegration through the Asylum and Migration Fund in the period 2021-2027 we consider to be equally important.

- 2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?**

We expect Frontex to build adequate return and reintegration supporting capacities. Likewise, we really expect a well-prepared and sustainable full involvement of the Agency in the reintegration operations from July 2022.

- 3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?**

From our point of view, our best contribution at the moment may lie in a good coordination, sharing and exchange of information and experiences. We are actively involved in the JRS pilot which we consider to be an important opportunity and contribution to the formulating and setting up the processes of the future reintegration framework.

DENMARK

- 1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?**
- 2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?**

For question 1 and 2, Denmark notes, that it is priority for Denmark that the quality and operational frameworks mentioned in the strategy are developed in cooperation with relevant stakeholders and that there is a joint reintegration service that lives up to this framework.

- 3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?**

Member States must make sure that Frontex delivers on their obligation to provide joint integration services with the same breadth, geographical scope and quality as expressed in the framework. Denmark agrees that member states must contribute to achieve a successful implementation of the strategy steps related to Frontex activities. Such contribution could be to make available results of innovative initiatives, which Frontex could benefit from, and to continue building better links with other development initiatives.

As regards the transfer of ERRIN activities to Frontex, while we have understood that Frontex has done the final assessment of which specific ERRIN activities Frontex does not expect to take up in June 2022, it is our understanding that there is a continued need to further unpack the details of how and at which pace, Frontex plans the detailed take up of activities. This detailing is urgently needed so that the Member states may take appropriate preparatory measures in order to avoid a gap in the delivery of services. At the IMEX meeting in July, Frontex requested the Member State's participation in the description of the needs and in the detailing of the activities. As mentioned during that meeting, Denmark stands ready to participate, whether in an advisory role in the pilot project or whether in other fora such as the ERRIN network or other fora such as the PRRN.

FINLAND

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

Several measures proposed in the strategy are already implemented (at least to some extent) at the national level in Finland. For instance, return counselling has been developed as a member of ERRIN and through national AMIF-funded projects. Therefore, we recognize the importance of developing return counselling further in cooperation with Member States and with the support of Frontex. Same applies to reintegration services and RIAT.

As priorities we would, above all, list activities which seem to require advancement/reinforcement in most Member States – namely, third country cooperation and establishing and/or reinforcing the link between reintegration and development to the extent allowed by the mandate of Frontex. Investment in these areas would bring added value to the whole EU and support us in finding best ways to allocate EU-funding.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

As repeated by Finland in several occasions, we find uninterrupted continuation of ERRIN activities crucial and the mandate of Frontex should be used to the full extent in this respect. This includes developing a network of service providers for reintegration without diminishing the quality. On the contrary, Frontex should fully apply the quality framework for reintegration service providers - which will be made available by the Commission - while managing the joint reintegration services provided to returnees.

As far as the contractual framework is concerned, we strongly support a model in which Frontex would conclude contracts with service providers while Member States would conclude a contract with Frontex only. The model used by ERRIN in which each Member State has had contracts with several service providers has turned out to be administratively burdensome for small Member States with small number of returnees to several third countries as a result of which it has been easier to rely on service packages provided by the IOM. Therefore, we would very much like to see Frontex to build a JRS program which supports Member States in using the services for instance by providing necessary administrative support and taking care of contracts and payments in relation to service providers as well as monitoring the quality of services on behalf of Member States.

On the whole, we expect that synergies will be gained and resources saved while activities covered by the Strategy can be implemented by and with the coordination of Frontex. This requires a transparent advancement of activities by Frontex.

We believe that good results can be reached by a step by step approach for instance as far as return counselling is concerned - Frontex could first focus on training the standing corps and, later, widen the scope to cover national return counsellors as well.

We are, especially, enthusiastic about the capacity building activities in third countries and look forward to contributing to the development of these activities in the context of CAP4REIN.

Finally, we would like to list the important supportive role of Frontex in the development of EU-level information tools.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

In our opinion, Member States have an important role to play in this regard. As Frontex now has more tools and resources to offer, Member States should, actively, participate in planning the new activities of Frontex for instance through different workshops. Member States should, proactively and clearly, inform the Agency on their needs and give guidance as regards to which direction the activities should be developed. This includes listing the third countries which should be targeted. Well-argued feedback on the measures taken is also essential for the successful implementation in the long-term. The support provided by the Agency and its standing corps should be used to the extent possible, based on the needs of Member States. Finally, as the activities of Frontex are now discussed in several different forums, effective contribution also requires coordination of views and exchange of information at the national level in Member States.

GERMANY

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

The seven pillars proposed in the strategy are important guidelines and a solid basis for the work during the coming years.

Looking at the pillars in detail, the effective coordination of all stakeholders is very important, in particular taking a “whole-of-government approach”, which harmonizes the interests of interior and development policies. To achieve the best results of reintegration for all actors involved, we would also like to underline the importance of an early involvement of national and local actors and the linkages to the national and development strategies of the origin countries. Furthermore, we would like to highlight the pillars of ensuring quality of support, fostering sustainability of reintegration support and ownership of partner countries and adequate funding.

2. What are the Member States’ expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

Frontex as one of the main actors of the implementation of the strategy carries an important role in the success of it.

From the perspective of a MS that highly appreciates and supports the activities of the current ERRIN-network, top priority for Frontex is **to successfully continue the Joint Reintegration Service activities** within the framework of its mandate, **with the same breadth and geographical scope as currently under ERRIN**. At the same time, it is vital to create a system of contracts and administration, which is practically feasible both for MS and service providers. We therefore welcome and support the efforts undertaken during the current pilot project. However, we recognize the strong efforts still necessary in order to be fully operational by next summer. Therefore, we encourage Frontex **to launch a call for service providers as soon as possible**.

In other areas of cooperation, e.g. return counselling and capacity building for reintegration, we anticipate to gradually increase our cooperation with Frontex, while the Agency is building up its capacities. In general, we expect transparency in processes and close cooperation with MS in order to take on board MS experiences and needs of cooperation.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

Having extensive experience and expertise in the field of voluntary return and reintegration, MS are crucial in consulting, guiding and providing insights to Frontex regarding implementation of the strategy steps.

We are therefore convinced that future strategy steps related to Frontex should **be developed in close cooperation with MS**. This way, the valuable assistance of Frontex in the area of voluntary return and reintegration can be used best.

Therefore, for example, we actively participate in the JRS pilot, providing input for the future shaping of the programme.

Other areas of cooperation include, for example, return experts, their training and deployment and the use of the common data management tools (RIAT and RRAI).

Furthermore, the application, development and further advancement of the quality framework for voluntary return and reintegration will benefit significantly from a **close harmonization of understanding between the MS and Frontex**. The already mentioned vast experiences that MS accumulated, but also the diversity in those, is irreplaceable when taking into account the importance of a quality framework that benefits all relevant stakeholders in its application of the strategy steps.

GREECE

Q1: In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

A: Concerning the measures proposed in the EU strategy, they are all very important. However and according to our point of view, we regard as priority activities to be implemented the following:

- Effective return counseling and referral, because it is very important to build a relation of trust with the migrant
- Ensure quality of support, in both the pre-departure phase as well as post arrival, in order to annihilate the negative consequences for the level of acceptance of return
- Effective coordination between all stakeholders, in order to ensure consistency in the whole process
- Fostering sustainability of reintegration support based on the needs of the returnee in order to ensure a better future in his/her home country.

Additional comment:

A: According to our point of view, we regard as priority activities to be implemented the following:

- Effective return counseling and referral through consulting offices
- Effective support, in both the pre-departure phase as well as post arrival
- Continuation of ERRIN activities
- Funding of various actions
- Capacity building
- Digitization of the entire return process
- Effective coordination between all stakeholders, in order to ensure consistency in the whole process
- Coordination of actions / trainings as a general approach.

Q2: What are the Member States' expectations from FRONTEX as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

A: FRONTEX should play a key role in the achievement of the objectives of the EU Strategy, in order to support voluntary return and reintegration. For this reason, at first regard FRONTEX should step up its training on return counseling, in addition to the adoption of the common curriculum. Also, FRONTEX should keep and further develop information tools such as the RIAT tool, always ensuring appropriate governance structures for them.

Additional comment:

A: Cooperation between MS and Frontex is a key precondition for the implementation of a common strategy. For this reason, Frontex supports and should continue to support any development on the field of voluntary returns and readmissions. In addition, information tools such as the RIAT tool should be further developed.

Q3: How can Member States best contribute to the successful implementation of the strategy steps related to FRONTEX activities?

A: First of all, this could be achieved by streamlining the use of RIAT in return counseling and referral processes. Then, all the achievements (such as the common curriculum for returns counselors) made by the ERRIN should be taken under consideration and built on them.

Additional comment:

A: common IT –system as RIAT in the field of voluntary returns and reintegration common curriculum for returns counselors

HUNGARY

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

The participants of voluntary return are not only those persons who already received the return decision but among of them are many who decides to leave the country before the expire or extension of their residence permit, and also many of them are living in a private accommodation. The question is how will these persons be informed about the return possibilities, will FRONTEX carry out information campaigns, will have offices in the member states where the potential returnees may receive advisement, and how will they manage for returnees the (not financial) supports before return? What are the duties of member state? There are many mainly operational questions and we need to know the answers in advance in order to be able to make a clear supporting decision.

In our view, counselling and additional information on return after the return decision is issued is a key factor, given the need for subjects of return to understand their obligation to return, the possibilities of returning to their country of origin, the legal consequences of not fulfilling this obligation, and in particular the differences between voluntary and forced return. To plan their return and reintegration, these persons need up-to-date and reliable information on the possibilities of return and reintegration. As stated in the proposal, it is clear that the sooner an irregular migrant returns, the more likely it is that the person will accept the return, if it is done in a fair and efficient procedure and the person concerned is provided with clear and comprehensive information. In this context, the proposals for action related to return counselling are considered as a priority. In addition, time is a huge factor by return operations. Authorities should strive for faster procedures in order to increase the willingness for voluntary returns.

Furthermore, it is important to underline that experience has shown that in many cases the amount of the reintegration package for voluntary return is higher than for forced return, which may be an incentive for voluntary return. In the case of direct reintegration assistance, it should be avoided that it is only financial and thus only encourages further migration. In our view, support in the form of cash alone will not allow the necessary conditions for long-term prosperity to be created, and may only lead to further migration, as the person concerned will continue to be subject to the underlying factors that triggered the migration. As a result, a more efficient way to use EU funds would be to finance concrete projects.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

We strongly believe that Member States should be assisted and supported in the most efficient and accessible way possible in implementing returns. For this reason, among others, Hungary supported the extension of the mandate of Frontex, as we believe that the realisation of this objective will offer the greatest potential for the activation of the full potential and capacities of Frontex.

In our view, under the new mandate, Frontex can support the entire return process, from identification of persons to support for the organisation of flights and the costs of expulsion, to voluntary return assistance. For this reason, we strongly believe that, in the light of the new extended mandate, Frontex should carry out and manage the logistical activities necessary for returns, and the Commission, together with the Return Coordinator and EU Delegations, should ensure (if necessary with the involvement of the Council and Member States) the active and constructive cooperation of the country of origin or transit.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

Long-term cooperation between the various parties is key to effective reintegration assistance. A Quality control would be important to monitor the legal use of reintegration grants and the overall running costs of the whole programme. It is therefore crucial to have active cooperation between Frontex and Member States based on mutual trust and continuous monitoring of the implementation of strategic actions, periodic reporting by Frontex. In addition, Frontex needs to take into account the views; experiences and suggestions of Member States, continuously analyse and evaluate them, and implement the strategic elements according to a timetable (which may be flexible depending on the circumstances).

IRELAND

- 1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?**

A standard approach to VR across all member states, the sharing of information and an agreement on how VRs should be carried out across all member states should be decided as a priority.

- 2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?**

Guidelines on a united approach to pre-return assistance and re-integration programme, would be very welcome

- 3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?**

To be open to member state collaborations and increase information sharing facilities, make the changes that are needed to ensure VR is a viable and palatable option to those who may need it.

LUXEMBOURG

The experience in Luxembourg shows that for a functioning “voluntary return system” 3 conditions have to be fulfilled:

- A clear political message that rejected asylum seekers and all other people that are not eligible to stay in the country or the EU have to return to their country of origin.
- An efficient forced return system.
- Limited to people where there is a real chance of return, especially for rejected asylum seekers in an accelerated procedure from safe countries of origin: Stopping housing and social benefits for people who are no longer entitled to them.

Therefore working on this 3 axes would be the best way to increase the number of voluntary returns. Mostly promoting cooperation in forced returns to countries of origin would be very helpful.

In practice, Luxembourg has to cope with the disadvantages of a small country working with a single service provider, the International Organization for Migration (OIM). Certainly the OIM has the advantage of being a global player and offering return and reintegration services to nearly all countries of origin. On the other hand, the IOM has also a couple of disadvantages:

- Offered return and reintegration services are very expensive.
- Lack of flexibility and transparency..
- Slow implementation of return requests.

To compensate those disadvantages and to increase the offer concerning return and reintegration, Luxembourg became member of the ERIN project and the ERRIN program later on. Unfortunately, the implementation of this program and later project was too complicated for a small country like Luxembourg.

So for Luxembourg the priority regarding voluntary return and reintegration is to implement a user friendly, efficient, and flexible system to get an attractive alternative to the offer of IOM. ERRIN and RIAT are a good beginning but they need further development to be also suitable for smaller member states.

In parallel, FAR needs some changes taking into account that some smaller member states have very few flight from their airport(s) to destinations outside the Schengen Area. It would also be very useful to be able to use FAR for readmission cases i. e. flights to other member or Schengen States.

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

Ad Q1: Two measures could help to reinforce voluntary returns and reintegration:

- Increasing the opportunities and the numbers in forced return.
- Putting into place an efficient, flexible and user friendly ERRIN network as an alternative to OIM for small member states.

Reception facilities with social aid and return policy are of national competence.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

Ad Q2: Luxembourg expects FRONTEX to become a reliable partner for the ERRIN network taking into account the specificities of a small member state.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

Ad Q3: Member states can best cooperate and contribute to the successful implementation of the strategy by clearly communicating their needs and the problems they face in practice.

MALTA

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

The Maltese authorities welcome the measures proposed in the strategy and emphasise the importance of a flexible approach in voluntary return and reintegration support. The strategy mentions the fragmentation of approaches across the EU, with different methods being implemented; however, it is important to consider the specific circumstances of each Member State. Caution is needed in the development of the quality framework and the identification of common quality standards, to maintain flexibility in establishing tailor-made packages and timelines in which such support is to be provided. Finally, the implementation of measures within the Strategy should not impose additional burdens on Member States, especially on those with limited resources.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

The role of Frontex in voluntary return and reintegration could also play an important role once all activities of the European Return and Reintegration Network (ERRIN) are taken over. In this regard, the Maltese authorities emphasise the importance of a tailor-made approach in return and reintegration assistance with the aim to reflect the specific circumstances of Member States. Of particular importance is to extend AVRR projects to more priority third countries and the assignment of more project partners that can provide such assistance. This should be done following consultation with Member States.

The provision of effective Return Counselling is another important tool that should be used more in the return process. The Maltese authorities welcome the current efforts conducted by the International Centre for Migration Policy Development (ICMPD), Frontex and the ERRIN in developing a common curriculum for return counsellors as part of the CADRE project. Once such a curriculum is finalised, Frontex could assist in providing training to national return counsellors. Moreover, following consultation with Member States facing migratory pressures, return counsellors could also be useful.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

Coordination is key in the effective implementation of the Strategy. In this regard, several stakeholders will be involved in voluntary return and reintegration, including National and International authorities and Third country officials and Frontex, to mention a few. An effective coordination mechanism amongst all stakeholders will be required to maximise the benefits of the Strategy.

THE NETHERLANDS

The observations of the Netherlands to **The exchange of views on the EU Strategy on voluntary return and reintegration with the focus on Frontex activities: (10080/21)**

The Netherlands welcomes the paper and the discussion and hence would like to thank the Slovenian Presidency for raising these issues.

The general remark is that the Netherland does not want "more legal framework" for *voluntary return*, since there are no legal restrictions to voluntarily return at the moment. It would possibly provide more rights to those who have exhausted legal proceedings and have no right to stay in our countries. Furthermore, there is a risk that *forced return* will be further limited. Additionally, it detracts from the main rule that countries must take back their citizens. Juridification offers no added value and even a risk that the Member States' perspectives for action will deteriorate.

Questions

- 1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?**

Answer

The legal and operational framework is key for the operationalisation of the activities listed in this Strategy. COM is requested to inform the MS on the state of play of this legal and operational framework. The Netherlands reiterates that the EU-framework should provide sufficient flexibility to fully complement MS' national framework in order to effectuate more (voluntary) returns.

Next to this the most important would be to find synergy between all the proposed activities (since there are a lot) to make it an enhanced and effective approach/strategy and not only loose elements/activities with their own pace and focus; one activity can add to the effectiveness of another or one should be implemented first to contribute to the implementation of the other. There should be a strategy on how to align all these activities to make them as effective as possible and to strengthen one another.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

Answer

The Netherlands supports the view of Frontex as the operational arm of the Common EU system of return and the view on the role of Frontex in improving the overall effectiveness of the system in supporting the practical use of a consolidated EU framework on voluntary return and reintegration. Against the background of the challenges that FX is facing, it is crucial that FX has adequate resources (e.g. capacity, budget) to fulfil its role within the field of return, readmission and reintegration. With regard to JRS, the role of Frontex is to guarantee continuity and quality of reintegration services and to ensure geographical coverage according to the needs of the MS. Apart from JRS, FX can facilitate MS in the implementation of capacity building projects in third countries aiming to enhance or consolidate the local infrastructure and capacity (e.g. reintegration partners and third country authorities). The deployment of Return Specialists with the Standing Corps can play an important role here as well.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

Answer

MS participation and uptake is key to a successful implementation of this Strategy. In order to achieve this, FX is requested to consult and involve the MS in the preliminary phase and developing process to make it a supported approach and to have all MS on board and active. MS may need time to adjust their national (inter alia legal, operational and financial) process to fully commit to and make use of the tools made available by the COM and FX. Additionally, the Netherlands remains committed to both incoming and outgoing deployments with the Standing Corps.

POLAND

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

Priority should be given to reducing the current fragmentation of voluntary return and reintegration assistance provided by Member States by developing a uniform and coordinated approach to this key element. A consistent, effective approach should be ensured by:

- an effective legal and operational framework as envisaged in the New Pact on Migration and Asylum (1. In the Proposal for a recast of the return directive there is a need for coherence of national voluntary return and reintegration programs and for improvement of legal rules in order to improve cooperation by migrants and to reduce the number of cases of absconding, 2. The Proposal for a regulation on asylum and migration management should reduce the length and simplify the return procedure, 3. The amended Proposal for a regulation on the establishment of Eurodac should enable monitoring of the phenomena of movement of foreigners who have been granted assistance in voluntary return and reintegration and thus should reduce the risk of unauthorized secondary movements of foreigners resulting from various national programs),
- development by the European Commission of a quality framework for entities providing reintegration services, which will also be used by Frontex (the lack of common standards results in significant discrepancies in terms of the quality, scope and consistency of support depending on the Member State from which the foreigner returns, the given third country and the entity providing assistance in reintegration),
- increasing, at the EC level, the coordination of the current national assistance programs in voluntary return and reintegration with the development strategies of third countries, which will reduce the risk of duplication of activities carried out by individual Member States,

- increasing the capacity of Frontex to provide Member States with operational assistance at all stages of return,
- following the adoption of a common training program for return advisers, Frontex should step up trainings, not just limiting them to the narrow category of return experts,
- promotion of interoperability between national return case management systems and those managed by Frontex, also ensuring quick availability of external financing.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

Priority in the support provided by Frontex in the area of voluntary return and reintegration is to ensure that all Member States can use the Joint Reintegration Services (JRS), through:

- creation and provision of a comprehensive offer of target third countries to which not only voluntary returns will be implemented, but also reintegration assistance will be available (in order to avoid fragmentation and emergence of parallel national structures),
- full coordination and financing of reintegration assistance by Frontex in order to reduce administrative and financial burden of the Member States (otherwise, using Frontex services will be no different from using IOM or other service providers) - framework contracts covering financial conditions with all reintegration partners should be concluded by Frontex,
- quick and uncomplicated procedure for the Member States to join Frontex reintegration projects in third countries,
- Frontex provision of resources to connect national RECAMAS and the Reintegration Assistance Tool (RIAT) to the IRMA system in order to create a common platform for all return activities.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

The Member States should:

- seek to use the operational assistance that Frontex can offer in the field of voluntary return and reintegration, provided that the conditions are created to ensure the coherence of the strategy prepared by the Agency,
- develop return advisory structures in line with the EU return advisory framework, under the condition that the training for return experts can be provided not only for the permanent corps,
- seek to develop their national return case management systems and the interoperability of ICT systems in order to obtain a complete picture of the use of voluntary return and reintegration in the EU, as well as to identify fraud in this area

ROMANIA

Q1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

RO: Prioritisation of measures should be based on the seven pillars of this strategy and should aim actions for increasing the effectiveness of the legal and operational framework, which will concur to the integrity of the whole EU system, helping the prevention of abuses.

One of the priority actions might be effective coordination between the stakeholders (pillar 2), effective return counselling and referral (pillar 4) , by enhancing the coordination between the current structures and linking reintegration programmes with more extensive national strategies, along with sharing best practices between Member States.

Q2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

RO: The role of Frontex as the operational part of the common EU system of return is essential for assistance with the new instruments supporting a bigger number of voluntary return operations and to strengthening the capacity to provide operational assistance to Member States in all phases of voluntary return process.

Q3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

RO: More efficient collaboration with Frontex on voluntary return and reintegration and an active involvement for an early outreach of migrants, by taking into account their vulnerabilities can contribute to the successful implementation of the phases of this strategy related to Frontex activities. Moreover, development of an efficient return training structure for increasing the training level of experts on return from Standing Corps could be a starting point.

SLOVAKIA

1 In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

The Slovak Republic sees priority mostly in harmonization of the common approach between stakeholders and support for the sustainability of reintegration assistance and ownership by partner countries.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

In our view it is essential to establish an effective procedure and possibility for the Member States to use Frontex in this activities. We could imagine that Frontex would centrally ensure activities regarding reintegration operationally and cooperate with organizations and service providers involved in the area, if possible. We believe this would significantly relieve Member States and increase the effectiveness of reintegration measures.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

MS should be helpful and active regarding cooperation in implementing the strategy. Strong cooperation is key in this area. MS should be helpful especially in providing information on legislation, procedures and in order to identify common procedures, legal and operational frameworks, in order to effectively implement this issue in practice.

SWEDEN

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

Answer:

- Allocation of sufficient resources at national level in order to carry out voluntary return activities.
- Increased cooperation and coordination between all stakeholders involved in reintegration activities.
- Agreement on a number of priority countries to implement enhanced reintegration activities in, based on the approach set out in the strategy. Selection of priority countries to be based on a number of agreed criteria and realistic objectives. Selection of countries should, to the extent possible, be linked to the COM/EEAS development of actions plans for a limited number of priority third countries in the external dimension.
- To further develop and improve monitoring and evaluation mechanisms into return and reintegration programme activities in order increase sustainability. Important to have an evidence-based approach and draw lessons learnt from contexts where this has worked (or not) to understand what factors contribute to sustainable reintegration.
- Make return counselling and referrals more efficient through giving timely, up-to-date and relevant information on the return process and available support to returnees as well as involve and exchange information on R&R with external stakeholders such as authorities at State and municipal level, as well as relevant NGOs etc.
- Promote an active role of receiving country authorities during the return process, make use of the regional migration dialogues. Cooperation between authorities in sending and receiving countries can be encouraged.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

Answer:

- To fully carry out the new mandate of the agency, in close consultations with the Member States' competent authorities.
- Support to joint charter flights has proved to be an activity with concrete results as well as supportive Frontex measures through arranging scheduled flights through the FAR system.
- Expectations that the agency will be able to deliver reintegration support to the same extent, quality and geographical coverage as ERRIN does currently.
- Frontex should efficiently coordinate and finance reintegration support measures to the largest extent possible to lower the administrative and financial burden for MS.
- Support from Frontex in the pre-departure stage such as delegation visits from third countries for identification and travel doc issuance purposes as well as providing common EU tools and training in the counselling process, would be valuable.
- Also important, is the Frontex support in coordination and interconnection as well as efficient implementation of the different EU and Frontex return case management systems and platforms for return, readmission and reintegration such as RCMS, RECAMAS, IRMA, RIAT and RRA.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

Answer:

- Ensure close cooperation between the Member States' competent authorities and Frontex and to make sure that all necessary national infrastructure is adequately equipped for this purpose.
- MS should assist Frontex with their experience, expertise and lessons learned from national return and reintegration activities and their involvement in European cooperation such as the ERRIN network, IOM etc through actively participate in the different Frontex consultation forums and networks sharing information and influencing the development and implementation of voluntary return and reintegration activities.

LIECHTENSTEIN

1. In relation to the measures proposed in the strategy to reinforce voluntary returns and reintegration, what do Member States regard as priority activities to be implemented?

For Liechtenstein as a small state without external Schengen borders (incl. no airport), good cooperation and coordination, especially with neighbouring states, has always played a decisive role in establishing an effective return policy. Therefore, we believe that also in the larger, EU-wide context, promoting and strengthening cooperation and coordination between national, European and international authorities and partners with the aim to establish an effective coordination between all stakeholders is regarded as a key priority to an effective return strategy.

In Liechtenstein, most asylum, migration and return matters are handled by a single authority. With regard to return counselling, for example, this makes it possible for the returnees to have the same contact person during all stages of migration. This aims at ensuring consistency in return counselling, which should thereby include the individual circumstances and ideas of the persons concerned in the best possible way. The consistency and quality of return counselling should make it possible to build up an environment of trust between the persons concerned and the staff of the authorities, which should have a positive impact on the willingness to return voluntarily. In this respect it is regarded as a priority activity to implement effective return counselling as well as ensuring a good quality of support with the overall aim to promote effective returns.

2. What are the Member States' expectations from Frontex as one of the main actors in the implementation of the strategy? Which activities do Member States regard as priorities in this regard?

Frontex as the operational arm should aim at improving the overall effectiveness of the common EU system of returns. Frontex should be able to reinforce its capacities provide assistance to the Member States in all phases of voluntary return and reintegration together with increasing the number of voluntary return operations.

In order to achieve a more coherent approach and to ensure similar quality standards in the Member States, Frontex should set up training programmes for return counsellors. Where necessary Frontex should support Member States by deploying return experts trained in return counselling.

3. How can Member States best contribute to the successful implementation of the strategy steps related to Frontex activities?

Member States and Frontex should intensify cooperation including the exchange of experience and knowledge. This should include Member States and Frontex consulting each other in general return matters as well as where necessary in individual cases and provide guidance and insights. Moreover, Member States should make use of the assistance that Frontex provides in relation to voluntary return and reintegration.
