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NOTE

From:	General Secretariat of the Council
On:	26 May 2025
To:	Delegations
Subject:	Strengthening the role of the European network of immigration liaison officers in intensifying operational and strategic cooperation with partner countries

Introduction

The European Network of Immigration Liaison Officers (ILO Network) was originally created in 2004 to facilitate the measures taken by the EU to address and combat irregular migration. The ILO Network was considerably reinforced through the 2019 ILO Network Regulation¹, which put stronger emphasis on the need for dialogue and cooperation on migration-related issues with third countries. According to Article 2 of 2019 ILO Network Regulation, an ‘immigration liaison officer’ means a liaison officer designated and deployed abroad, by the competent authorities of a Member State, or by the Commission or by a Union agency, in accordance with the respective legal basis, to deal with immigration-related issues, also when that is only a part of their duties”. ‘ILO’ is therefore an umbrella term referring to European Union Return Liaison Officers (EURLOs), European

1 Regulation (EU) 2019/1240 of the European Parliament and of the Council of 20 June 2019 on the creation of a European network of immigration liaison officers (recast).

Migration Liaison Officers (EMLOs), Liaison Officers of Frontex (FLOs) or other Union Agencies and liaison officers deployed abroad by the competent national authorities of Member States².

The ILOs' tasks include maintaining contact with the third country's competent authorities and relevant organisations operating within the third country, collecting a wide scope of information, coordinating among the liaison officers and with relevant stakeholders in the context of capacity building, possible assistance in confirming identity and returns, resettlement, admission procedures, supporting legal migration strategies and channels between the Union and third countries, taking into account skills and labour market needs in Member States and facilitating implementation of Union and national measures in respect of the admission of legal migrants, in addition to the specific tasks provided for in the legislation relevant for each type of ILO.

Almost six years after the adoption of the Regulation, progress towards a fully operational ILO Network remains limited and falls short of the potential to achieve an intensified Team Europe approach on all aspects of migration management. The report on the implementation of the ILO Network Regulation, to be published by the Commission by the first quarter of 2026, will take stock of the progress achieved and identify shortcomings. It will also allow to put forward proposals ensuring that the ILO Network's full potential can be achieved in its support to the EU's migration management policy.

The Polish Presidency recognises the role of the ILO Network Steering Board in providing necessary guidance for the Network's operationalisation. In parallel, the Presidency considers it necessary and timely to hold a strategic exchange among the EMWP delegates on the ILO Network's role in intensifying operational and strategic cooperation with partner countries, with particular emphasis on the external dimension of migration.

In the first half of 2024, the Belgian Presidency facilitated a series of discussions on the role of liaison officers in building a more effective and coordinated European return system, particularly in cooperation with countries of origin and transit. There was an agreement among the Member States that ILOs constitute an important tool with the potential to improve migration management, but that this potential should be further maximised, especially for returns.

2 ST 5494/24 Presidency discussion paper on liaison officers as partners to build a stronger common European return system

During the exchange among Member States, it was also stressed that there is a need to enhance cooperation among officers working in the same third country or region, along with the importance of continuous coordination and information sharing between the Liaison Officer (LO) and the European Union Delegation (EUDEL) in the host country. Additionally, where relevant, this coordination should include Common Security and Defence Policy (CSDP) missions with a migration mandate.

The outcome of these discussions served as an input to the proposal for the Return Regulation³. The new legislation foresees the establishment of dedicated Union return liaison officers, supporting the readmission procedure to third countries. According to the proposal, these officers would be financed by the EU and would become a part of the EUDEL's structure. Moreover, it is expected that these officers will coordinate their tasks with the Commission to ensure that relevant Union policy priorities are fulfilled. The first reading of the proposal by co-legislators is currently ongoing, therefore the final wording of the provisions concerning Union return liaison officers is not yet known.

On 14 March 2024, the EMWP held an exchange of views on the challenges and opportunities of the coordination of the local and regional networks of the ILO Network⁴. The Polish Presidency would like to build on the outcome of these discussions, while presenting an overview of the ILO Network, focusing on the need to augment the ILO Network's overall impact in supporting EU migration management in the external dimension, the specific contribution brought by European Migration Liaison Officers (EMLOs) and the role of the Frontex Liaison Officers (FLOs).

3 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 from 11.3.2025 – COM (2025) 101 final.

4 ST 7245/24 Presidency discussion paper – Coordination of the local and regional networks of the European Network of Immigration Liaison Officers: Challenges and opportunities

The ILO Network

During the March 2024 EMWP discussion, several points of improvement were identified, including the need for a clear, strategic vision for both short- and long-term deployments of ILOs; the need for a tailored approach for each specific third country and flexibility. Enhancing the attractiveness of liaison officer postings, especially in challenging third-country environments, remains a priority. Difficulties in filling certain seconded position vacancies (e.g. EMLOs, EURLOs) in key third countries remain a pressing issue, even a year after a vacancy was first brought to the attention of the Member States. As such, the Polish Presidency would like to reiterate the previous calls urging the Member States to come forward with proposals for candidates who meet the eligibility criteria (including the need for an EU security clearance). The Belgian Presidency also encouraged the Commission to provide sufficient funding (in the next MFF proposal) to support the deployment of ILOs. Non seconded positions (e.g. Frontex Liaison Officers that are statutory staff of Frontex), face less difficulties in attracting suitable candidates.

The 2019 ILO Network Regulation enables ILOs to play a more effective role in managing migration flows, including through strengthening their role in gathering and exchanging information on migration flows, irregular migration, returns and readmission, as well as legal migration and protection. In addition, the ILO Regulation established a secure web-based information exchange platform ('EMN IES') maintained by the Commission. Nevertheless, as underlined by the Belgian Presidency, progress is needed in registering national liaison officers to the above-mentioned platform, as many national officers are not yet registered in the system. Moreover, legal constraints related to the transfer of sensitive information have been identified; this is a major obstacle in ensuring better cooperation among the Network. The Polish Presidency believes that ILOs, as 'our eyes and ears on the ground', should play an important role in providing information for early warning and preparedness. Therefore, it is necessary to provide them with access to the tools allowing secure exchange of information. Effective information exchange with external partners is crucial for the EU's capacity to manage migration at its external borders and in cooperation with third countries. Additionally, fully mobilising ILOs, and notably EMLOs, to situational awareness, early warning and forecasting activities could be organised through existing tools and mechanism allowing the exchange of sensitive non-classified information. The Blueprint Network offers a secured area for such exchanges, and dedicated work strands to standardised information sharing for early warning purposes could be envisaged.

The role of ILOs in legal migration has so far not reached its full potential, while there is a need to reinforce our cooperation on legal migration with partner countries to as part of the external dimension of migration, including Talent Partnerships.

Previous discussions have shown that diverging practices exist among Member States, leading to discrepancies among the profiles of liaison officers and in the deployment of liaison officers to different areas. These practices may lead to fragmentation, undermining the EU's ability to present a unified approach towards third countries and weakening the external dimension of migration policy. Standardisation of profiles and mandates should be considered. Moreover, ILOs should coordinate locally/regionally to share information, stay abreast of the full spectrum of migration issues in their area of responsibility, and share information with their headquarters, the Commission and with the ILO community through the EMN-IES platform, thereby contributing to EU situational awareness and to a coherent strategic approach towards third countries. For this purpose, the Belgian Presidency proposed establishing common reporting requirements for all liaison officers present in the same host country. It could also be envisaged to develop greater institutional integration of information sharing to increase Member States', the Commission's and JHA agencies' situational picture and understanding of migration trends, in support of Union policy development and operational action. Frontex and Europol could play a greater role in this regard.

European Migration Liaison Officers (EMLOs)

European Migration Liaison Officers (EMLOs) are national experts seconded to the Commission (specifically to DG HOME) on a cost-free basis and deployed in EU Delegations in one of the priority countries, as agreed upon in a Council's concept paper of autumn 2015⁵ (this list has been further amended in consultations with the Council). Furthermore, the document operationalises the idea presented in the European Council conclusions (April 2015) and reflects the vision set out in the European Agenda on Migration. EMLOs, who are part of the ILO family, are tasked by the 2019 ILO Network Regulation with the responsibility of facilitating local and regional ILO networks and coordinating ILOs in their country/region of deployment (in the absence of an EMLO, this responsibility falls upon EU agency liaison officers, and in the absence of either, on a designated Member State ILO).

5 ST 13435/15 Concept paper on the deployment of European Migration Liaison Officers

Furthermore, the main tasks of EMLOs include: building and maintaining working relationships with the national authorities of the country of posting, stepping up coordination to maximise the impact of EU action on migration in third countries and enhancing the engagement of key countries of origin and transit on the entire spectrum of migration issues, as well as monthly and ad hoc reporting to the relevant institutions and MS— thus contributing to early warning, and facilitating the follow-up of actions with relevance to migration. EMLOs are thus called to play a key role in contributing to migration governance and management, including preventing and countering irregular migration, counter-smuggling, counter-trafficking and border protection measures, better organising legal migration and mobility, including supporting the implementation of Talent Partnerships and resettlement, ensuring more effective return and readmission, proving protection and support to host communities, and building economic opportunities. In reality, in many of the EU Delegations of their posting, EMLOs have become key resources in the field of migration, substantially supporting the Delegations' limited capacities in implementing the EU's ambitious agenda and intensive engagement with third countries, which makes their absence very noticeable if the vacancies remain unfilled for extended periods of time. By performing these tasks, EMLOs contribute to steering a coherent approach towards third countries and to provide a more efficient operational structure to local and regional ILO networks. This role could be further reinforced through a standardised practice of sharing information relevant for early warning purposes.

The actual mandate of each EMLO is adapted to the specific situation of the hosting third country, in particular, the migratory and security challenges there and the level of the country's cooperation with the EU. The overview of the EMLOs deployed and EMLOs vacancies is presented below:

	Country		End of secondment	DDL of vacancy	Member State
1	Bangladesh	<i>vacant</i>		25.07.2025	
2	Ethiopia (regional mandate covering Horn of Africa)		31.05.2026		DE
3	Egypt		31.03.2026		DK
4	Georgia (regional mandate for Eastern Partnership)		31.05.2026		BE
5	Lebanon (regional mandate covering Syria and Jordan)		31.08.2025		LU
6	Mali	<i>vacant</i>		Recruitment procedure pending	
7	Mauritania		28.02.2026		ES
8	Morocco	<i>vacant</i>		25.06.2025	
9	Niger	<i>vacant</i>		On hold due to the security situation	
10	Nigeria		31.03.2026		DE
11	Pakistan (regional mandate covering Afghanistan)		31.01.2027*		DE
12	Senegal		15.05.2026		DE
13	Serbia (regional mandate for Western Balkans)		30.06.2025 (confirmation of extension pending)		DE
14	Sudan (regional mandate covering Chad)	<i>vacant</i>		To be published	
15	The Gambia	<i>vacant</i>		26.05.2025	
16	Tunisia (regional mandate covering Libya)		15.09.2025	25.07.2025	FR
17	Türkiye	<i>vacant</i>		26.05.2025	

* Under current contract, to be extended

Frontex Liaison Officers (FLOs)

Frontex Liaison Officers (FLOs) also occupy a pivotal role in the ILO network. FLOs engage with national authorities, EU Member States' diplomatic missions, international organisations and civil society to promote information exchange and joint initiatives. They facilitate the implementation of Frontex's working arrangements with national authorities, ensuring compliance with Union law and respect for fundamental rights and foster cooperation in border management, migration, and cross-border crime prevention, as well as supporting return operations. Additionally, FLOs assist in organising training, workshops, and seminars, and support the negotiations of new working arrangements where applicable.

The legal foundation for the deployment of FLOs is Article 77 of the European Border and Coast Guard Regulation⁶, whereunder Frontex may deploy experts (mainly from its statutory staff) to third countries. FLOs are integrated into local or regional ILO networks and other relevant networks. Their tasks must be carried out in compliance with Union law, and they are expected to coordinate closely with Union delegations and, where relevant, with CSDP missions and operations, while remaining under the direction of Frontex. They are normally co-located in the relevant EUDELs. In the absence of an EMLO, FLOs have the responsibility, as per the 2019 Regulation, to facilitate the local/regional ILO network.

6 Regulation (EU) 2019/1896 of the European Parliament and of the Council of 13 November 2019 on the European Border and Coast Guard and repealing Regulations (EU) No 1052/2013 and (EU) 2016/1624

Frontex's Management Board, based on proposals from the Executive Director, adopts a yearly list of priority countries for the deployment of liaison officers, focusing on countries of origin or transit for irregular migration. The actual deployment is subject to a prior opinion from the European Commission. This structured approach ensures that FLOs are strategically positioned to enhance the EU's external border management and migration cooperation efforts.

The Agency currently has seven liaison posts in third countries:

Country	FLO Base	First Deployment
Türkiye	Ankara	2016
Bosnia and Herzegovina Serbia Montenegro	Belgrade	2017
Albania Kosovo North Macedonia	Tirana	2020
Mauritania Senegal The Gambia	Dakar	2020
Armenia Azerbaijan Georgia Moldova Ukraine	Chisinau	2021
Pakistan	Islamabad	2025
Morocco	Rabat	Expected 2025

Discussion questions:

1. How can we increase **the added value of the deployment of ILOs** in third countries, particularly in enhancing the EU's external migration management?
2. How can the **activities of ILOs be better integrated with other EU external migration instruments**, including resettlement, humanitarian admission and legal migration (e.g. Talent Partnerships, future Multipurpose Legal Gateway Offices to ensure a coherent and effective external migration policy)?

3. What are the **main challenges and opportunities** with regard to:
- a) **the ILO Network**, in particular regarding the coordination mechanism and information exchange within the network?
 - b) **the secondment of new EMLOs**, including encouraging the Member States to further second EMLOs?
4. Which **other third countries** should EMLOs be deployed to, in addition to current list of priority third countries?
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