

**EXECUTIVE COMMITTEE OF THE HIGH COMMISSIONER'S PROGRAMME 95TH
STANDING COMMITTEE MEETING**

24–26 MARCH 2026 Regional Update for Europe: NGO Collective Statement

Dear Chair, Distinguished Delegates,

This statement was drafted in consultation with NGOs and organisations led by forcibly displaced and stateless persons.

Meaningful solidarity remains both possible and necessary in Europe. However, it is being pursued against a backdrop of shrinking civic space, a severe funding crisis, and an accelerating trend toward the externalisation of asylum responsibilities, with NGOs facing criminalisation because of their solidarity with refugees, and the manipulation of migration as a political tool.

We are alarmed by the mainstreaming of narratives that openly question the relevance of the 1951 Refugee Convention. The asylum debate has become increasingly distorted—prioritising border management over the foundational principles of international protection and non-refoulement. We reaffirm that the Convention remains the most necessary and effective instrument for protection in the 21st century. It is fit for purpose

As the EU Pact enters its implementation phase, the NGO community remains concerned about the potential for systemic rights violations within mandatory screening and border procedures. The use of expedited processes and expanded detention, including of children and families, undermines individual assessments and significantly heightens the risk of refoulement.

For the Pact to be genuinely rights-compliant, the Independent Border Monitoring Mechanism must be truly autonomous, adequately resourced, and equipped with a clear escalation plan to ensure meaningful accountability. Access to high-quality, independent legal aid from the earliest possible stage remains essential for people navigating these complex environments.

While the importance of Meaningful Refugee Participation is increasingly acknowledged, it must move beyond ad hoc consultation toward institutionalised leadership. Refugee-led organisations and community-based groups are the most trusted interlocutors within their communities across Europe, yet they continue to receive a disproportionately small share of available funding. The ongoing funding crisis has pushed many vital community-based protection initiatives into survival mode at precisely the moment their expertise and reach are most urgently needed.

We urge delegates to give urgent attention to three significant gaps we see in the current protection response:

- **Statelessness:** Identification of stateless people remains a critical gap. Many states lack dedicated determination procedures, leaving stateless individuals exposed to detention and the denial of basic rights. We urge that this is addressed as a priority.
- **Child Protection:** We are witnessing a decline in resources for child-specific protection, with increasing risks of trafficking as a result. Specific and sustained attention is needed for young people ageing out of care, who frequently lose both support systems and legal status the moment they turn 18.
- **Gender-Based Violence:** Access to justice and safe shelter continues to vary widely across the region. The funding crisis has led to the suspension of critical GBV prevention

programmes, while growing "anti-gender ideology" trends place further strain on already fragile protection frameworks.

The NGO community calls on UNHCR and Member States to:

1. Reject legislative proposals or bilateral agreements that seek to externalise asylum processing or outsource return procedures to third countries.
2. Establish standardised criteria for Independent Border Monitoring Mechanisms that guarantee genuine operational independence from national ministries, with findings linked to clear accountability mechanisms.
3. Integrate statelessness screening into the EU Pact's initial procedures and national implementation plans by 2026, supported by UNHCR-led training for border authorities.

NGOs remain fully committed to supporting Member States in implementing policies that place human dignity at their centre. We must work together to ensure the foundational principles of refugee and human rights law are upheld across Europe.

We warmly welcome High Commissioner Salih and look forward to a partnership grounded in transparency and shared responsibility.

The full statement is available on icvanetwork.org.

I thank you.