

Brussels, 1 August 2025

Dear Sirs and Madams,

I am writing you on behalf of the European Council on Refugees and Exiles (ECRE), an alliance of 128 organisations across 40 European countries, which works on displacement in Europe and in Europe's external policies.

Among other activities, ECRE carries out research on EU asylum law, including management of the Asylum Information Database (AIDA), which contains information on asylum procedures, reception conditions, detention and the content of international protection in 25 European countries. The AIDA database is an independent, authoritative source of information, used by EU policy-makers, courts, researchers, practitioners and the media across Europe. It is partially funded by the EU under the Asylum Integration and Migration Fund (AMIF).

ECRE is currently updating the country reports in the AIDA database to include factual information for the year 2024.

In this context, we would like to offer you the right of reply concerning the material in the AIDA report for the report on Portugal before its publication in the AIDA database.

If you have any comments on the facts and/or legislative information presented in the report please feel free to contact ECRE within the next two weeks.

Please provide your comments in the attached template which follows the standard structure of the AIDA reports. ECRE will only be able to address comments provided in this format. All comments provided will be reviewed and taken into account by ECRE.

Should it be of interest to you, we would be pleased to publish your reply in a separate Annex to the country report, which will appear on the AIDA website. Please inform us if you are interested in taking up this option. If not, the comments will be treated as confidential and shared only with the national expert.

We kindly request that you submit your comments within two weeks from the date of this letter. Please note that ECRE will only be able to consider comments provided within this deadline, to avoid delays in publication. Thus, after two weeks from the date of the letter, we will proceed to publication.

You will find the AIDA Project Right of Reply Template below, and the draft country report on Portugal attached to this letter.

We look forward to your reply and remain at your disposal should you have any questions or need further information.

Yours sincerely,
Catherine Woollard
Director, ECRE

The AIDA country reports are part of the Asylum Information Database (AIDA), partly funded by the European Union's Asylum, Migration and Integration Fund (AMIF). The contents of this report are the sole responsibility of ECRE and can in no way be taken to reflect the views of the European Commission.



Member State Reply on the 2024 AIDA country report on Portugal

The Asylum Information Database (AIDA) is managed by the European Council on Refugees and Exiles (ECRE). It aims to provide up-to date information which is accessible to researchers, advocates, legal practitioners and the general public through the dedicated website www.asylumineurope.org.

AIDA covers 24 countries, including 19 EU Member States (AT, BE, BG, CY, DE, ES, FR, GR, HR, HU, IE, IT, MT, NL, PL, PT, RO, SE, and SI) and 5 non-EU countries (Egypt, Serbia, Switzerland, Türkiye, Ukraine and the United Kingdom). Each report documents asylum procedures, reception conditions, detention and the content of international protection in the country concerned.

Based on the final draft for the AIDA country report on Portugal, we would like to offer you the opportunity of a right of reply concerning the facts and legislative information presented in the report. ECRE will only be able to consider comments that are provided in the template below within two weeks from the date of receipt, to avoid delays in publication.

Upon the request of the Member State, the comments will be published in a separate annex to the country report on the AIDA website. Otherwise, they will be treated as confidential. The template reflects the chapters of the report.

Please ensure that responses remain within the scope of each section. Where possible, information provided should be sourced.

Reply

1. Statistics

Reference to statistics extracted from the country report	Page and section	Comments, corrections, or additional statistical information and updates
<i>According to information provided by AIMA, in 2024, 15 admissibility decisions were issued.</i>	10, Applications and granting of protection status at first instance: 2024	In 2024, the number of admission was 1238 (this figure may include applications from previous years).

2. Overview of the main changes since the previous report update

Extract from the country report	Page and section	Comments
<i>According to CPR's analysis, while the transition process was quite long, it was neither gradual, nor participatory. Notably, it did not include a sustained strategy of cooperation with other relevant public entities and with civil society organisations.</i>	22, Background information – transition from SEF to AIMA as asylum authority Also 34	The process involved close consultation with organisations throughout the process which occurred before AIMA entered into force.
<i>With regards to asylum in particular, in 2024 CPR continued to observe multiple</i>	22, Background information –	In response to the significant increase in applications for international protection recorded from February 2024 onward—most of which were deemed

<i>gaps in the implementation of legal norms concerning the asylum procedure and reception conditions, without proper account to the need to ensure the continuity of services despite institutional reforms.</i>	transition from SEF to AIMA as asylum authority Also 34	manifestly unfounded—accelerated procedures were temporarily implemented. This exceptional situation was closely monitored by UNHCR, which conducted several visits and actively oversaw the procedural steps undertaken during this period. Following a subsequent decline in the number of applications and a shift in strategic direction introduced by the newly appointed Board of Directors in July 2024, a comprehensive review of the procedures was carried out. As a result, standard case processing was reinstated during the second half of 2024 and has remained in effect to date.
<i>A working group with the mission of preparing, coordinating and ensuring the execution of the national implementation plan was set up by the Government in October 2024.²⁶ A first version of the national implementation plan was submitted to the EU in December 2024. The Government planned a more advanced version for the beginning of 2025, after national discussions in Parliament and in the National Council for Migration and Asylum;</i>	23, Overview of the main changes since the previous report update	This Working Group was created in the framework of the European Union's Pact on Migration and Asylum (Despacho n.º 11856-A/2024, 07/10/24). It is not linked to the Action Plan presented by the previous Portuguese Government and which was referred above.
<i>According to CPR's observation, the impossibility of presenting/registering applications and obtaining information on cases outside these cities lasted throughout 2024 and at least the first semester of 2025</i>	24, Asylum procedure, Registration of asylum applications	While AIMA acknowledges the existing limitations in the submission and registration of international protection applications outside the cities of Lisbon, Porto, and Coimbra, several AIMA Service Centres have nonetheless been receiving such applications throughout 2024 and continuing to the present date. These applications are duly recorded in the CNAR system. AIMA has undertaken all necessary measures to ensure that its Service Centres are progressively equipped and prepared to provide a more effective and consistent response in this domain.
<i>Concerning systematic practices regarding asylum interviews were and/or continued to be observed throughout 2024, notably:</i>	24, Asylum procedure, Interviews	We would kindly request that this particular remark be rephrased to reflect the procedural developments introduced in July 2024. Specifically, we ask that it distinguishes between practices in place prior to that date and those implemented after.
<ul style="list-style-type: none"> - <i>Oversimplification of the interviews and of the questions asked to the applicants;</i> - <i>Interviews being conducted late in the night/early in the morning and following trips to different areas of the country;</i> 	24, Asylum procedure, Interviews	Due to the high volume of international protection applications received—many of which were manifestly unfounded—during February 2024, in particular, interviews were conducted using a simplified script tailored to specific cases. This accelerated procedure was implemented on a temporary basis only. Following the reinstatement of standard procedures, interviews were conducted in accordance with regular protocols. Beginning in September 2024, AIMA staff involved in both the lodging of the application and case instruction began participating in specialized training sessions provided by the EUAA, particularly focused on interview techniques. The interview script

		<p>templates, which had already been reviewed in July 2024, were subsequently reviewed and validated by the EUAA.</p> <p>Since February 2024, all interviews have been conducted during regular service hours, with the aforementioned situation being an isolated occurrence limited to a single weekend in February.</p>
<i>Applicants systematically asked during the interview if they wish to be immediately notified of the decision of their asylum application without being informed that such a decision implies a relinquishment of their right to reply to the interview/case report and without having access to legal information and assistance before making a decision;</i>	25, Asylum procedure, Interviews	<p>This procedure was not applied throughout the entirety of 2024. It was introduced in February and, from March onward, was applied exclusively to cases considered manifestly unfounded. The procedure was also reviewed and monitored by UNHCR.</p> <p>It is important to highlight that individuals were consistently informed by the interviewer of their right to waive the time period established under Article 17(2), with a clear explanation of the legal framework and implications of this provision. As of July 2024, the procedure ceased to be applied, and the full implementation of Article 17(2) was reinstated.</p> <p>We would like to kindly ask that this remark is rephrased.</p>
<i>Applicants not being informed of the possibility to be interviewed in a language they understand with the assistance of an interpreter, despite clear difficulties in communicating in another language;</i>	25, Asylum procedure, Interviews	<p>From the initial lodging of the application to the instruction phase, applicants are consistently asked to indicate the language they understand, ensuring that all procedural acts are conducted in that language. The process for collecting information regarding the applicant's spoken language has also been enhanced, both during the preliminary inquiry and at the interview stage.</p> <p>Furthermore, provisions are in place to allow applicants to change the selected language during the interview, should they demonstrate difficulty in understanding it. This ensures that communication remains effective and that the applicant's rights are fully safeguarded throughout the procedure.</p> <p>We would like to kindly ask that this remark is rephrased.</p>
<i>Applicants not being informed of their right to reply to the interview/case report and/or about their right to legal assistance</i>	25, Asylum procedure, Interviews	<p>Applicants are consistently informed of their right to receive legal assistance or to be represented by a lawyer during all procedural stages. From the moment an application for international protection is submitted, through the interview and notification phases, applicants are made aware of the legal support provided by CPR, as well as the possibility of seeking assistance from a lawyer of their choice.</p> <p>Following the interview, applicants are systematically notified of their right to respond to the transcript of the interview, ensuring full transparency and respect for procedural guarantees.</p> <p>We would like to kindly ask that this remark is rephrased.</p>
<i>AIMA never clarified this practice, which seemed to change at the end of the year</i>	25, Asylum procedure, Subsequent applications	<p>In September 2024, with the aim of standardizing procedures related to subsequent applications, it was established that any subsequent application submitted to AIMA, I.P. must be registered whenever the applicant expresses the intention to submit such a request.</p> <p>Applicants are also formally notified to provide supporting evidence, new facts, or relevant information. An interview may be conducted if</p>

		deemed necessary based on the circumstances of the case.
<i>While AIMA has confirmed that there is no list of safe countries of origin, according to CPR's observation, the use of the safe country of origin concept significantly increased in 2024 compared to previous years. Notably, in most cases this ground was used solely by citing the legal provision and in conjunction with other provisions. Designation of a country as safe however was not consistent between cases.</i>	25 and 26, Asylum procedure, Safe country of origin	Although a considerable number of international protection applications were deemed unfounded and shared a common country of origin among applicants, each case was subject to an individual assessment. The concept of a safe country of origin was applied as a guiding framework; however, decisions were always based on the specific circumstances presented by each applicant and supported by relevant international sources concerning the country in question.
<i>The reasons provided for such decisions did not engage with the legal requirements for the application of the concept and consequent inadmissibility of the asylum application, and did not include an individual assessment.</i>	26, Asylum procedure, Safe third country	Although a significant number of international protection applications were considered inadmissible, with the concept of a safe third country applied in many of these cases, each application was subject to an individual assessment. The evaluation process took into account the specific grounds presented by the applicant, as well as relevant international sources concerning the country in question.
<i>CPR is aware that in some cases in 2024 release from detention was delayed due to the lack of reception response on the national territory.</i>	26, Reception response after release from detention	It is important to underline the written consent of the citizen, as explicitly mentioned in the Report MNP 2024 : "At UHSA and EECIT-L, the MNP was informed that situations had occurred in which, considering the special vulnerability of the foreign citizens in question and the lack of a timely reception response (which would have left them homeless), detention was extended beyond the maximum legal detention period, with the citizen's written consent." (Page 56).
<i>Information collected by CPR indicates the systematic detention of children accompanied by family members and other particularly vulnerable persons, such as pregnant women, sick people, victims of torture/violence and others. Despite the fact that responsibility for promoting special procedural guarantees that could lead to the release from detention lies with AIMA, it seems that the Agency has no decision-making power on the conditions and maintenance of detention of asylum applicants at the border</i>	27, Detention of asylum applicants, Detention of vulnerable applicants	Specific cases involving applicants for international protection who are unaccompanied minors, families with children, pregnant women, individuals with chronic illnesses, or those suspected of having mental health conditions have been flagged by the Public Security Police (PSP) to both the judicial authorities and AIMA. In most instances, entry into national territory is authorized through the issuance of a special visa by the PSP, in recognition of the applicants' vulnerability and the need to ensure a prompt and appropriate response.
<i>CPR received consistent reports according to which significant numbers of asylum applicants remained detained in the transit area of the airport for prolonged periods of time in conditions that are incompatible with human dignity.</i>	27, Detention of asylum applicants, Detention conditions	The responsibility for the detention of asylum seekers, including the management of the facilities where they are held, lies with the Public Security Police (PSP). This includes both the execution of detention and the provision of basic needs such as food and hygiene. The PSP assumed these duties following the dissolution of SEF and now oversees the detention facilities and the transit area, where individuals were temporarily held due to capacity constraints.

		In this context, the Agency for Integration, Migration and Asylum (AIMA) is responsible for processing asylum applications. Applications submitted at the border have been processed within the shortest possible timeframes, often in less than three days, in order to minimize the duration of detention. AIMA has reinforced its teams and procedures to ensure rapid and high-quality analysis of these cases.
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3. Asylum Procedure

Extract from the country report	Page and section	Comments
<i>CPR also observed a growing tendency for narratives focused on the need to contain and limit the number of asylum applications, which is highly concerning.</i>	34, A. General, 4. Determining Authority	AIMA is not aware of the source or specific data that led to this conclusion. Applications for international protection are received either by AIMA or by law enforcement authorities and are subsequently registered in the CNAR system, without any restriction on the applicant's right to submit a request.
<i>CNAR's new staff have received structured and compulsory initial training, which includes basic legal training provided by UNHCR and CPR (e.g., CPR's training focused on the forms of international protection, determining protection needs, and the national asylum system and procedures). While CPR deems this as a positive aspect, according to the feedback of both CPR trainers and trainees, at the time the needs were wider and not fully addressed in the initial training. Also, caseworkers were already performing their duties. According to AIMA, caseworkers receive continuous training, including EUAA's modules, and are encouraged to attend further initiatives.</i>	36, A. General, 4. Determining Authority, Quality Assurance	New CNAR staff members received initial training provided by CPR and UNHCR. Following an assessment of further training needs, continuous capacity-building efforts have been in place since September 2024, with the EUAA conducting targeted training sessions in Portugal for all CNAR personnel, tailored to specific thematic areas. At present, the majority of staff have received certified training from the EUAA in areas such as inclusion, interview techniques, evidence assessment (provided in 2024), interviewing vulnerable individuals, and the Dublin procedure (the latter provided specifically to staff responsible for applying the Dublin Regulation). Additionally, staff members have been sent abroad to participate in EUAA training programmes, with some now serving as certified EUAA trainers.
<i>According to the information provided by AIMA, the programme for humanitarian admissions of Afghans was suspended, with no arrivals in Portugal since August 2024.</i>	44, B. Access to the procedure and registration, 1. Access to the territory and push backs, 1.2 Legal access to the territory, Evacuation of Afghan citizens	Additionally, we note that the programme has already been resumed in 2025.
<i>According to CPR's experience, asylum applicants are not systematically provided with quality interpretation services at this stage of the procedure,</i>	48, B. Access to the procedure and registration, 3. Registration	While we value all feedback received from applicants and interested organizations, it is important to clarify that, from the initial lodging of the application phase through to the processing of the application, applicants are always asked about

<p><i>which may result in the collection of insufficient and low-quality information.</i></p>	<p>of the asylum application</p>	<p>the language they understand, ensuring that all procedural acts are conducted in that language. Since July 2024, enhanced measures have been adopted to ensure that applicants are consistently asked about the language they understand—from the initial reception to the instruction phase—thus guaranteeing that all procedural acts are conducted in a language they comprehend. These improvements include refinements in the preliminary inquiry and interview stages, as well as the possibility for applicants to change their preferred language if comprehension difficulties arise, thereby promoting more effective and respectful communication.</p>
<p><i>Since the beginning of AIMA's operation, CPR has observed/received reports of concerning practices pertaining to the registration of asylum applications, namely: Applicants being incorrectly informed that applications for international protection could only be made by persons displaced from Ukraine;</i></p>	<p>48, B. Access to the procedure and registration, 3. Registration of the asylum application</p>	<p>AIMA does not restrict asylum applications to individuals displaced from Ukraine. Any person seeking international protection may apply, regardless of nationality. Any misinformation encountered is being addressed through staff training and improved public communication.</p>
<ul style="list-style-type: none"> - <i>Refusals to register applications due to lack of personnel;</i> - <i>Introduction of a ticketing system at CNAR's premises according to which a ticket was required to apply for asylum. Following the distribution of 20 tickets per day no further applications were allowed;</i> - <i>Applicants forced to travel across the country to Lisbon in order to present/register an application in CNAR, after being refused in other AIMA's premises with the exception of Porto and Coimbra;</i> - <i>Applicants being incorrectly informed of the need to schedule an appointment in order to present an application for international protection in AIMA's premises other than CNAR;</i> 	<p>48, B. Access to the procedure and registration, 3. Registration of the asylum application</p>	<p>AIMA keeps working to expand capacity and decentralize registration services to avoid requiring applicants to travel to Lisbon, Porto or Coimbra. Any misinformation encountered is being addressed through staff training and improved public communication.</p>

- Lack of issuance or renewal of a certificate of asylum application in AIMA's premises other than CNAR;		
<i>The Government did not clarify for how long the presentation of applications for international protection were concentrated in Lisbon, Porto and Coimbra, nor the reasons for this limitation, and how it was overcome and the remaining AIMA front desk services were able to register applications for international protection.</i>	49, B. Access to the procedure and registration, 3. Registration of the asylum application	While AIMA acknowledges the existing limitations in the submission and registration of international protection applications outside the cities of Lisbon, Porto, and Coimbra, several AIMA Service Centres have nonetheless been receiving such applications throughout 2024 and continuing to the present date. These applications are duly recorded in the CNAR system. AIMA has undertaken all necessary measures to ensure that its Service Centres are progressively equipped and prepared to provide a more effective and consistent response in this domain.
<i>CPR is also aware of instances in 2024 where asylum applicants were urged by AIMA officials to withdraw their applications for international protection without having access to legal information/assistance and based on wrongful information. This includes incorrect information such as the suggestion/advice that only applications related to political matters or problems with the authorities are accepted; wrongful assumptions regarding the situation in the country of origin; and the provision of incorrect and/or incomplete information regarding other avenues for regular stay and corresponding reception conditions. Importantly, such cases concerned particularly vulnerable applicants. CPR required clarifications regarding this practice and assisted the concerned applicants in requesting reversal of the withdrawal. While no specific feedback was received by the organisation, CPR is aware that the asylum applications concerned were reinstated by the authorities.</i>	49, B. Access to the procedure and registration, 3. Registration of the asylum application	Following the identification of a few isolated cases in which the information provided may not have been sufficiently clear or complete, a re-evaluation and revision of those cases was carried out by AIMA in accordance with the provisions of the Asylum Law. In parallel, staff were reminded of the importance of ensuring the quality and clarity of the information provided to applicants, with a view to strengthening procedural transparency and compliance.
<i>According to CPR's observation, in July 2025 this impossibility had not been entirely overcome.</i>	49, B. Access to the procedure and registration, 3. Registration of the asylum application, note 191	While AIMA acknowledges the existing limitations in the submission and registration of international protection applications outside the cities of Lisbon, Porto, and Coimbra, several AIMA Service Centres have nonetheless been receiving such applications throughout 2024 and continuing to the present date. These applications are duly recorded in the CNAR system.

		AIMA has undertaken all necessary measures to ensure that its Service Centres are progressively equipped and prepared to provide a more effective and consistent response in this domain.
<i>CPR has further observed significant delays between the date of issuance of decisions and its notification to the asylum applicant. In some cases, this delay was of over one year. This continued in 2024; there are no known justifications for the delays, which can affect all applicants.</i>	51, C. Procedures, 1.1. General (scope, time limits)	It has been observed that the time elapsed between the issuance of a decision and its notification is often linked to the applicant's absence due to unknown whereabouts, or to operational constraints that hinder the timely delivery of the notification.
<i>Nevertheless, CPR found that AIMA had internal guidance according to which in the case of evacuated Afghan citizens only the head of the family (i.e. the man) was to be interviewed. CPR was not able to confirm this information and to establish when such a practice may have begun.</i>	53, C. Procedures, 1.3. Personal Interview	In 2024, AIMA conducted interviews with Afghan women, including those who were part of family units. As a result, the previous practice of excluding such individuals from individual interviews was phased out during that year.
<i>Specifically, between February and April 2024, a number of interviews were conducted by AIMA officials not associated to CNAR and it is unclear whether they had training to do so.</i>	54, C. Procedures, 1.3. Personal Interview	In response to the high number of international protection applications registered during the final months of 2023 and the first quarter of 2024, human resources from other departments within AIMA were temporarily assigned to CNAR. These staff members received initial training to conduct interviews. As previously mentioned, this situation was closely monitored from the outset by UNHCR, which carried out several visits, observed interviews, and followed the instruction procedures implemented during this period.
<ul style="list-style-type: none"> - <i>Oversimplification of the interviews and of the questions asked to the applicant;</i> - <i>Interviews being conducted late in the night/early in the morning and following trips to different areas of the country;</i> - <i>Applicants systematically asked during the interview if they wish to be immediately notified of the decision of their asylum application without being informed that such a decision implies a relinquishment of their right to reply to the interview/case report and without having access to legal</i> 	54, C. Procedures, 1.3. Personal Interview	We refer to the clarifications provided under the section Overview of the main changes since the previous report update, pages 24 and 25, Asylum Procedure – Interviews.

<p>information and assistance before making a decision;</p> <ul style="list-style-type: none"> - Applicants not being informed of the possibility to be interviewed in a language they understand with the assistance of an interpreter, despite clear difficulties in communicating in another language; - Applicants not being informed of their right to reply to the interview/case report and/or about their right to legal assistance. 		
<p>Refusal by the interviewing officers to receive evidentiary elements despite the applicant's attempts on the grounds that it would not be necessary (no written decision/explanation provided);</p>	<p>54, C. Procedures, 1.3. Personal Interview</p>	<p>AIMA has consistently demonstrated openness and availability to receive supporting evidence, both during the initial lodging of international protection applications and throughout the instruction phase. It is common for applicants to submit documentation during the interview and subsequently send additional evidence via email, as advised at the conclusion of the interview. We would like to kindly ask that this remark is rephrased.</p>
<p>While some of these systematic practices eased during the second half of 2024, many reports persisted.</p>	<p>54, C. Procedures, 1.3. Personal Interview</p>	<p>We refer to the clarifications provided under the section Overview of the main changes since the previous report update, pages 24 and 25, Asylum Procedure – Interviews, as these clarifications confirm that such practices were brought to an end as of July 2024, with some having already been phased out prior to that date.</p>
<p>AIMA did not systematically communicate these decisions to CPR.</p>	<p>54, C. Procedures, 1.3. Personal Interview</p>	<p>The suspension of the procedure constitutes an administrative act provided for in the Code of Administrative Procedure and must be duly communicated to the concerned party, in accordance with the principles of transparency and good administration. However, in certain cases, such communication is not carried out, as the decision to suspend the process is based on the fact that the whereabouts of the individual are unknown to AIMA, thereby making notification impossible.</p> <p>Within the framework of the Asylum Law, particularly Article 32, it is observed that even in cases where the procedure is terminated following its suspension, there is no legal provision requiring such decisions to be communicated to CPR. Therefore, in adherence to the principle of legality enshrined in both the Constitution and the Code of Administrative Procedure, this practice lacks explicit legal basis. Consequently, AIMA does not communicate these decisions to CPR.</p>

<i>Throughout the year, CPR has also received reports of applicants not being informed of the possibility to be interviewed by AIMA in a language they understand with the assistance of an interpreter, despite clear difficulties in communicating in another language (such as English).</i>	55, C. Procedures, 1.3. Personal Interview, 1.3.1. Interpretation	While we value all feedback received from applicants and interested organizations, it is important to clarify that, from the initial lodging of the application phase through to the processing of the application, applicants are always asked about the language they understand, ensuring that all procedural acts are conducted in that language. Since July 2024, enhanced measures have been adopted to ensure that applicants are consistently asked about the language they understand—from the initial reception to the instruction phase—thus guaranteeing that all procedural acts are conducted in a language they comprehend. These improvements include refinements in the preliminary inquiry and interview stages, as well as the possibility for applicants to change their preferred language if comprehension difficulties arise, thereby promoting more effective and respectful communication.
<i>AIMA pledged to establish a code of conduct in interpretation services and engage interpreters in EUAA's trainings.</i>	55, C. Procedures, 1.3. Personal Interview, 1.3.1. Interpretation, note 222	We kindly suggest that this sentence be included in the main body of the text, rather than in a footnote, in order to ensure AIMA's ongoing commitment to improving procedural safeguards.
<i>According to CPR's observation, the summary report ceased to be issued in May 2024 and AIMA opted for the issuance of the transcript of the statements report together with a notification of the right to reply. Initially this notification mentioned the prospective decision to be taken (merely a reference to the legal premise without its grounds) but it was later dropped.</i>	56, C. Procedures, 1.3. Personal Interview, 1.3.1. Recording and reporting	AIMA clarifies that, following the recent amendment to Article 17(2) of the Asylum Law, it is possible to choose between preparing a comprehensive report or providing a full transcript of the statements made. In this context, the procedure currently adopted involves delivering the full transcript of the applicant's interview, followed by a formal notification informing them of their right to add or clarify any statements made, as well as to submit additional evidence or facts.
<i>The transcript of the statements reports are usually communicated to CPR accordingly, although in a significant number of cases AIMA communicates them after the applicants' 3-day deadline has passed.</i>	57, C. Procedures, 1.3. Personal Interview, 1.3.1. Recording and reporting	AIMA is making every possible effort to correct this practice. Nevertheless, it is important to note that applicants are informed, at the time of notification, that they have a period of three days to respond to the transcript of the interview. They are also advised that they may seek free legal assistance from the CRP systematically.
<i>According to CPR's observation, since the beginning of AIMA's operation, clarifications/corrections provided in writing by applicants are not usually properly analysed by the authority nor taken into account in the decision- making process.</i>	57, C. Procedures, 1.3. Personal Interview, 1.3.1. Recording and reporting	As part of the decision-making process, AIMA conducts a thorough assessment of all elements submitted by the applicant. While all facts and documents are fully taken into account, they do not necessarily influence the outcome or change the direction of the decision. The final decision is based on the relevance, consistency, and credibility of the applicant's statements, as well as the supporting evidence contained in the case file.
<i>As mentioned above, throughout 2024 AIMA's officials systematically asked the applicants during the interview if they wished to be immediately</i>	57, C. Procedures, 1.3. Personal Interview, 1.3.1.	We refer to the clarifications provided under the section Overview of the main changes since the previous report update, page 25, Asylum procedure, Interviews.

<i>notified of the decision of their asylum application. Applicants were not properly informed that such a decision implied a relinquishment of their right to reply to the interview/case report, and did not have access to legal information and assistance before making a decision. As a consequence of this practice, a significant number of applicants have been unable to exercise their right to reply to the written report since the beginning of AIMA's operations.</i>	Recording and reporting	
<i>The 'sovereignty clause' enshrined in article 17(1) of the Dublin Regulation and the 'humanitarian clause' enshrined in its article 17(2) are at times applied in practice, but the criteria for their application remain unclear and specific statistics are also limited.</i>	66, C. Procedures, 2. Dublin, 2.1. General, 2.1.1. Application of the Dublin criteria	Portugal didn't encountered situations that would warrant the application of the specific criteria set out in the Dublin Regulation regarding transfers based on humanitarian or family grounds. Nevertheless, AIMA remains attentive to evolving circumstances and is fully prepared to apply these criteria whenever the legal conditions are met.
<i>CPR has observed cases where, following a refusal by the appointed lawyer to provide free legal aid on the grounds that the chances of success were limited, the Bar Association chose not to appoint a replacement.</i>	63, Legal assistance in appeals	We do not have any data that supports this information. We needed more time to be able to better reply to this observation.
<i>Another concern relates to the overall quality of free legal aid at appeal stage (...) In general, appointed lawyers are not trained in Asylum Law and have limited experience in this specific field.</i>	63, Legal assistance in appeals	The Portuguese Bar Association (OA) is the entity responsible for the specific training of lawyers in Portugal. To practice law, one must have a law degree and be registered in the OA, after completing an internship. Continuing education is also mandatory and can be obtained through various entities, including the OA itself, higher education institutions, and certified training companies.
<i>Additional persisting challenges in this regard include the absence of an easily accessible interpretation service, which hinders communication between the lawyer and the client during the preparation of the appeal. Although AIMA's translation hotline can constitute a useful tool in this regard, according to CPR's experience, it is insufficiently used by lawyers.</i>	63, Legal assistance in appeals	We do not have any data that supports this information. We needed more time to be able to better reply to this observation.
<i>Until the end of 2023, even when the personal interview focused on the grounds of the application for international protection, the document narrating the individual interview handed out</i>	68, C. Procedures, 2. Dublin, Application of the Dublin	The procedure is currently under review, with the aim of incorporating this information into the interview document.

<i>to the applicant included a reference to the Dublin Regulation, as well as a waiver for sharing information under Article 34 of the Regulation. Since the beginning of 2024, the document contained no such reference.</i>	criteria, 2.2. Procedure	
<i>Moreover, according to CPR's observation, the common information leaflet set out in Article 4(3) of the Dublin III Regulation is distributed to asylum applicants by AIMA, but it is not clear when. According to AIMA, the leaflet is distributed at the appropriate stage of the procedure.</i>	68, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.2. Procedure	At the time of registering the application for international protection, AIMA provides applicants with informational leaflets about the Dublin Regulation.
<i>The information contained in these leaflets does not include all the information included on the Annex X (partially includes Part A but not Part B) of the corresponding Implementing Regulation.</i>	68, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.2. Procedure	The procedure is currently under review, with the aim of incorporating this information into the informational leaflet provided to applicants at the time of registering their application for international protection.
<i>However, applicants subjected to the Dublin procedure are required to present themselves to AIMA monthly, and attendance is registered in a form and non-attendance may result in the reduction/withdrawal reception conditions. This practice is framed by the authorities as a requirement under the general duty of the applicant to present themselves to the asylum authority whenever requested. However, it can be argued that the practice constitutes a restriction to the applicant's freedom of movement.</i>	69, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.2. Procedure, 2.2.2. Transfers	<p>Monthly monitoring was introduced due to the fact that, in most cases, the reception entity does not inform AIMA of the applicant's disappearance, which complicates the execution of the transfer procedure under the Dublin Regulation. This measure has made it easier to locate applicants and expedite the corresponding procedure.</p> <p>Additionally, the monitoring serves as a scheduling mechanism for the renewal of the Declaration Certifying the Application for International Protection (DCAPPI) and for updating the applicants' contact details, which, in most cases, are not communicated to AIMA—particularly changes in their place of residence.</p> <p>In cases of non-attendance, AIMA informs the reception entity of the occurrence. However, the decision to reduce or terminate support and/or reception conditions falls exclusively within the competence of that entity, in accordance with Article 60 of the Asylum Law.</p> <p>Regarding concerns that this measure could be interpreted as a restriction of applicants' freedom of movement, it is important to emphasize that they are only required to appear at AIMA once a month. This does not, in any way, constitute a restriction on their freedom of movement. It is an administrative measure designed to ensure regular follow-up of cases, facilitate the renewal of documentation, and maintain up-to-date contact information. The frequency—once per month—is fully compatible with an autonomous and free lifestyle, allowing applicants to move freely, reside where they choose, and carry out their daily activities, provided they attend the scheduled</p>

		appointment. This measure supports more effective case management, particularly within the framework of the Dublin Regulation, without infringing on applicants' fundamental rights.
<i>According to AIMA, applicants are unable to present themselves on a scheduled date, they can request rescheduling. CPR was not able to independently confirm this information.</i>	69, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.2. Procedure, 2.2.2. Transfers	Applicants are verbally informed that, if they are unable to attend on the scheduled date, they should contact AIMA in advance to reschedule.
<i>Nevertheless, CPR is aware of cases where a transfer decision was adopted in the absence of an interview when the applicant absconded.</i>	70, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.3. Personal Interviews	According to Article 5(2)(a) of the Dublin III Regulation (Regulation (EU) No. 604/2013), the personal interview may be waived in cases where the applicant is revel.
<i>The interview form also contains a section on vulnerability but follows a limited understanding of the concept, as it only includes questions on the health condition of the applicant and family members.</i>	70, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.3. Personal Interviews	This measure was implemented following a recommendation from AIMA's internal audit, aimed at ensuring compliance with the General Data Protection Regulation (GDPR). The interview script was reviewed by the European Union Agency for Asylum (EUAA), ensuring that the procedures adopted respect data protection principles and the dignity of applicants, while also enabling the effective collection of information necessary for processing applications.
<i>However, despite the general rule determining that the deadline for response cannot be of less than 10 days, the deadline prescribed by the above-mentioned notifications is only of 3 days.</i>	70, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.3. Personal Interviews	The timeframe is in accordance with the provisions of the Asylum Law, ensuring compliance with the legal requirements applicable to the international protection procedure.
<i>According to CPR's experience, practice in this regard has been irregular since the beginning of AIMA's operations, and, even when CPR is informed in advance of the arrival of Dublin returnees, no other reports are provided.</i>	77, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.7. The situation of Dublin returnees	In take-charge situations, information regarding flights and medical reports is communicated to AIMA's Reception Services Directorate, the entity responsible for managing reception conditions for applicants for international protection.
<i>The agreement aims to facilitate returns by introducing non-binding shorter timeframes – one month instead of three months for a 'take charge' request –, flexible dates and times for the transfer and providing for group instead of individual transfers.</i>	77, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.7. The situation of Dublin returnees	Under the bilateral agreement with Germany, the timeframe for submitting take charge requests remains unchanged, in line with the Dublin Regulation. However, it was agreed that responses to such requests should be provided within five days. It is important to note that exceeding this response period does not imply tacit acceptance of the request by the German authority.
<i>In the context of providing legal assistance, CPR identified cases where the reception entity notified applicants of decisions</i>	79, C. Procedures, 3. Admissibility Procedure, 3.1.	This situation occurred on an exceptional and isolated basis at the beginning of 2024, involving only one reception entity. It was not applied during

<i>on behalf of AIMA, raising serious concerns as to the adequate explanation on the grounds for the decision, information on the right to appeal, access to proper interpretation, and in particular to the competence to carry out such an administrative act.</i>	General (scope, criteria, time limits)	the remainder of 2024, nor in subsequent periods, and remains an isolated occurrence.
<i>In what seems to be a wrong interpretation of the concept of exclusion given that, despite resorting to the institute of exclusion, in the decisions analysed, the authorities do not substantiate that an exclusion clause is verified, but merely that the inclusion requirements are not verified.</i>	79, C. Procedures, 3. Admissibility Procedure, 3.1. General (scope, criteria, time limits), note 367	The claim that AIMA invokes exclusion clauses without substantiating their application does not reflect the practice in place. Whenever an exclusion clause is applied, it is duly justified based on the elements contained in the case file, including concrete and legally relevant facts. AIMA carefully distinguishes between the absence of inclusion criteria and the application of exclusion clauses. The failure to meet inclusion criteria does not, in itself, justify the application of an exclusion clause. In its decisions, AIMA clearly differentiates between inclusion and exclusion criteria, and there are cases where, even when inclusion criteria are met, an exclusion clause is applied with appropriate justification.
<i>Detention conditions in the Lisbon airport have also raised serious concerns, notably due to the fact that in the end of 2023 and beginning of 2024 high numbers of asylum applicants remained detained for significant periods of time in the transit area of Lisbon airport due to the lack of capacity of the corresponding detention facility in appalling conditions.</i>	82 & 83, 4. Border procedure (border and transit zones), 4.1 General (scope, time limits)	Work in progress to address this issue, especially considering the new obligations under the European Pact on Migration and Asylum.
<i>CPR identified significant gaps in the provision of information by the authorities to asylum applicants detained at the border regarding their right to free legal assistance and the contacts that could be used to reach the organisation. At times, this was compounded by the provision of incorrect information regarding the deadlines to file appeals by the authorities. PSP and AIMA systematically told applicants that the deadlines for appeal are to be counted in working days, instead of calendar days.</i>	85, 4. Border procedure (border and transit zones) 4.1 General (scope, time limits)	Any misinformation encountered is being addressed through staff training and improved public communication.
<i>Yet, according to CPR's observation, throughout 2024, AIMA did not demonstrate any decision-making power on the conditions and maintenance of detention of asylum applicants at the border, leading to concerns about the identification and</i>	85, C. Procedures, 4. Border procedure (border and transit zones) 4.1 General (scope, time	Specific cases involving applicants for international protection who are unaccompanied minors, families with children, pregnant women, individuals with chronic illnesses, or those suspected of having mental health conditions have been flagged by the Public Security Police (PSP) to both the judicial authorities and AIMA. In most instances, entry into national territory is authorized through the issuance

<i>monitoring of vulnerable cases and application of special procedural guarantees and special reception conditions.</i>	limits), Exempted categories	of a special visa by the PSP, in recognition of the applicants' vulnerability and the need to ensure a prompt and appropriate response.
<i>In the context of providing legal assistance, CPR identified cases where the reception entity notified applicants of decisions on behalf of AIMA, raising serious concerns as to the adequate explanation on the grounds for the decision, information on the right to appeal, access to proper interpretation, and in particular to the competence to carry out such an administrative act.</i>	90, C. Procedures, 5. Accelerated procedures, 5.1 General (scope, grounds for accelerated procedures, time limits)	We refer to the clarifications provided under the section Asylum Procedure, page 79, C. Procedures, 3. Admissibility Procedure, 3.1. General (scope, criteria, time limits)
<i>Notably, by the end of 2023, AIMA issued more than 300 admissibility decisions due to the non-compliance with the 30-day time limit by the national authorities. A significant number of these decisions concerned applications made several months before.</i>	90, C. Procedures, 5. Accelerated procedures, 5.1 General (scope, grounds for accelerated procedures, time limits)	It is important to recall that AIMA began its operations on 29 October 2023 and underwent substantial structural and operational changes, which inevitably led to some constraints in the regular functioning of its services. Since then, significant improvements have been implemented in procedures, resulting in a marked reduction in decisions made by tacit admission and a notable increase in the speed of decision-making, thereby enhancing administrative efficiency and the quality of service delivery.
<i>CPR has even received reports of applicant's that described being told by officials that no positive decisions are issued to applicants from certain nationalities. Within the context of the right of reply of the authorities to the 2023 draft AIDA report, AIMA denied that this occurred.</i>	91, C. Procedures, 5. Accelerated procedures, 5.1 General (scope, grounds for accelerated procedures, time limits)	Although a significant number of international protection applications from the same countries were considered inadmissible or unfounded by AIMA, each application was subject to an individual assessment. The evaluation process took into account the specific grounds presented by the applicant, as well as relevant international sources concerning the country in question.
<i>In the past, CPR observed that the previous asylum authority referred certain rejected asylum applications to the regularisation procedures through the humanitarian clause of the exceptional regularisation regime of the Immigration Act, including cases of unaccompanied children and young adults (See: Differential treatment of specific nationalities in the procedure). AIMA does not seem to follow this practice.</i>	94, C. Procedures, 6. National protection statuses and return procedure, 6.1 National forms of protection	AIMA, in coordination with the Ministry of the Presidency, has been making efforts to develop a targeted response to cases involving unaccompanied minors under the scope of the Immigration Law. In this context, we refer the proposed amendment to the Law presented by the Government which aims at simplifying the regularization of children and young adults subject to protective measures, making it faster through its inclusion in article 122 (Proposta de Lei n.º 3/XVII/1.^a (GOV)).
<i>Despite these legal obligations, there are no (specific) mechanisms, standard operating procedures, or units in place to systematically identify asylum applicants who need special procedural guarantees.</i>	95, D. Guarantees for vulnerable groups, 1. Identification, 1.1 Screening of vulnerability	We would like to kindly ask that this remark is rephrased, given that specific mechanisms have been implemented to identify applicants who require special safeguards, notably through a screening process conducted at the time of reception and initial registration. The official in charge of screening can identify situations of vulnerability by filling out an internal document

		<p>created by AIMA's National Center for Asylum and Refugees, based on the "UNHCR-IDC Vulnerability Screening Tool - Identifying and addressing vulnerability: a tool for asylum and migration systems". Among those who may be flagged in this document and therefore benefit from special procedural and/or reception guarantees are the "pregnant woman or girl, or breastfeeding mother", the "woman at risk of sexual or gender-based violence, or adult or child victim of family violence, exploitation or abuse", 'survivors of torture and trauma', 'survivors of sexual or gender-based violence or other violent crime', 'victims of trafficking in human beings', 'potential victims of trafficking in human beings' and any unaccompanied minor, or accompanied by parents, family or guardian.</p> <p>This tool is systematically applied across all cases. This screening tool, created and implemented in September 2024, is intended to help identify the vulnerabilities of any applicant for international protection, which may lead to procedures being changed and adapted as well as referral for ongoing psychological support (this is done through the Social Security Institute, I.P.).</p> <p>With regards to accommodation, AIMA's Reception Management Unit is made aware of the vulnerabilities identified and it is the entity responsible to take these vulnerabilities into account when determining the accommodation of the applicant.</p> <p>Additionally, throughout the procedure, whenever situations arise that indicate the need for special safeguards, these are duly taken into account and communicated to the entities responsible for supporting the applicants, as well as to other organizations that can provide specialized and targeted assistance.</p>
<i>According to AIMA, CNAR's caseworkers do not have specific training in vulnerabilities but one of the caseworkers deals exclusively with unaccompanied children's applications. As of 2024, CNAR's caseworkers had not completed EUAA's training module on identification of vulnerable persons nor on interviewing vulnerable persons.</i>	96, D. Guarantees for vulnerable groups, 1. Identification, 1.1 Screening of vulnerability	In addition to the training provided by the EUAA in 2024, which covered issues related to vulnerable individuals in the modules on inclusion, interviewing, and evidence assessment, in June 2025 CNAR staff — specifically instructors and first-line officers — took part in a training session in Lisbon, also delivered by the EUAA, focused on conducting interviews with vulnerable individuals.
<i>AIMA's data on this parameter is inconsistent, as it also mentions 169.</i>	97, D. Guarantees for vulnerable groups, 1. Identification, 1.1 Screening of vulnerability, note 475	In 2024, indeed, a total of 203 unaccompanied children applied for asylum in Portugal. So we kindly request you to delete this footnote.
<i>While official data is not available, in recent years CPR observed that age assessment</i>	102, 1.2 Age assessment of	We do not have any data that supports this information. We needed more time to be able to better reply to this observation.

<i>procedures were triggered by Family and Juvenile Courts to almost all unaccompanied children by default, and without an analysis of the individual need for such procedures and/or prior individual hearing.</i>	unaccompanied children	
<i>It is unclear whether child protection concerns are specifically considered in such assessments. According to CPR's observation the procedures thereto fail to meet the holistic and multidisciplinary standards recommended by UNHCR.</i>	102 & 103, 1.2 Age assessment of unaccompanied children	The best interests of the child is a right and a principle enshrined in law. Although, Portuguese Authorities are currently working on improving and adapting age assessment processes as part of the implementation of the European Pact on Migration and Asylum.
<i>According to CPR's observation, throughout 2024, AIMA did not demonstrate any decision-making power on the conditions and maintenance of detention of asylum applicants at the border, leading to concerns about the identification and monitoring of vulnerable cases and application of special procedural guarantees and special reception conditions.</i>	106, D. Guarantees for vulnerable groups, 2. Special procedural guarantees, 2.2 Exemption from special procedures, Exemption from the border procedure.	We refer to the clarifications provided under the section, Overview of the main changes since the previous report update, page 27, Detention of asylum applicants, Detention of vulnerable applicants.
<i>As noted by UNICEF, the procedures in place are not in line with the principles of independence and impartiality of the guardian, as the role is typically assigned to the head of the institution responsible for the implementation of the child-protective measure</i>	107, 4. Legal representation of unaccompanied children	Work in progress to address this issue, especially considering the new obligations under the European Pact on Migration and Asylum.
<i>During 2024, CPR became aware that AIMA was not registering subsequent applications and instead notifying applicants to submit, within 5 working days, new facts, information or evidence, in order to assess whether to register the new application. This seems to be at odds with the Asylum Act and the APD. AIMA did not clarify this practice.</i>	110, E. Subsequent applications	We refer to the clarifications provided under the section <i>Overview of the main changes since the previous report update</i> , page 25, Asylum procedure, Subsequent applications
<i>Notwithstanding, according to CPR's observation, the use of the safe country of origin concept significantly increased in 2024 compared to previous years. Notably, in most cases this ground was used solely by citing the legal provision and in conjunction with other</i>	112, F. The safe country concepts, 1. Safe country of origin	Although a significant number of international protection applications from the same countries were considered inadmissible or unfounded by AIMA, each application was subject to an individual assessment. The evaluation process took into account the specific grounds presented by the applicant, as well as relevant international sources concerning the country in question.

<i>provisions. Countries such as Angola, Armenia, Brazil, Cape Verde, Colombia, Democratic Republic of the Congo, Dominican Republic, Gambia, Ghana, Guinea, Guinea-Bissau, Israel, Morocco, Peru, Senegal, Sierra Leone, United Kingdom and United States of America were deemed as safe countries of origin by the Portuguese authorities. Apart from Gambia and Senegal, this designation however was not consistent.</i>		In this context, the application of the concept is not entirely consistent, precisely because a case-by-case approach is adopted.
<i>CPR has received reports of applicant's that described being told by AIMA officials that no positive decisions are issued to applicants from certain nationalities, notably Gambia and Senegal. Within the context of the right of reply of the authorities to the 2023 draft AIDA report, AIMA denied that this has occurred.</i>	112, F. The safe country concepts, 1. Safe country of origin	We refer to the clarifications provided under the section Asylum Procedure, page 91, C. Procedures, 5. Accelerated procedures, 5.1 General (scope, grounds for accelerated procedures, time limits)
<i>According to CPR's observation, in contrast to previous years, the number of inadmissibility decisions on safe third country grounds significantly increased in 2024. Countries such as Angola, Brazil, Canada, Cape Verde, Israel, Morocco, Mozambique, Panama, Senegal, United Kingdom, United States of America, and Zambia were deemed as safe third countries by the Portuguese authorities, however this designation was not consistent.</i>	113, F. The safe country concepts, 1. Safe third country	We refer to the clarifications provided under the section Asylum Procedure, page 112, F. The safe country concepts, 1. Safe country of origin
<i>However, asylum applicants assisted by CPR whose applications were rejected on the basis of this inadmissibility ground were not given a document in the language of the safe third country stating that their claim was not examined on the merits.</i>	113, F. The safe country concepts, 1. Safe third country	As noted by CPR, AIMA, in its decision-making process, has taken into account not only the criteria for inadmissibility but has also assessed the conditions under which an applicant may qualify for international protection status.

<i>According to CPR's observation, the common information leaflet set out in Article 4(3) of the Dublin III Regulation is distributed to asylum applicants by AIMA, but it is not clear when.</i>	117, G. Information for asylum applicant and access to NGOs and UNHCR, 1. Provision of information on the procedure, Information on the Dublin procedure	The informational leaflet about the Dublin Regulation is provided after the moment when the applicant is informed of their rights and duties, ensuring that they have access to essential information from the outset of the procedure.
<i>The information contained in these leaflets does not include all the information included on the Annex X (partially includes Part A but not Part B) of the corresponding Implementing Regulation.</i>	117, G. Information for asylum applicant and access to NGOs and UNHCR, 1. Provision of information on the procedure, Information on the Dublin procedure	We refer to the clarifications provided under the section Asylum Procedure, page 68, C. Procedures, 2. Dublin, Application of the Dublin criteria, 2.2. Procedure
<i>In such cases, according to CPR's experience, the asylum applicant is not informed of details regarding the refusal to take back/take charge.</i>	117, G. Information for asylum applicant and access to NGOs and UNHCR, 1. Provision of information on the procedure, Information on the Dublin procedure	The procedure is currently under review.
<i>Asylum applicants detained at the border receive an information leaflet from AIMA, informing them of their rights and duties during the asylum procedure.</i>	117, G. Information for asylum applicant and access to NGOs and UNHCR, 1. Provision of information on the procedure, Information on the border procedure	The applicant also receives an informational leaflet about the Dublin Regulation, providing accessible explanations regarding the criteria used to determine responsibility for examining the international protection application.
<i>CPR has received reports of applicants that described being told by AIMA officials that no positive decisions are issued to applicants from certain nationalities, notably Gambia</i>	119, H. Differential treatment of specific nationalities in the procedure	We refer to the clarifications provided under the section Asylum Procedure, page 112, F. The safe country concepts, 1. Safe country of origin.

and Senegal. Within the context of the right of reply of the authorities to the 2023 draft AIDA report, AIMA denied that this occurred. Nonetheless, according to data collected by CPR based on the communications made by the authorities in line with the Asylum Act and contacts from asylum applicants, these countries were repeatedly considered safe countries of origin by the authorities in 2024.		
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4. Reception Conditions

Extract from the country report	Page and section	Comments
AIMA did not provide information on the total capacity and occupancy of the asylum reception system in 2024 during admissibility (including Dublin) and accelerated procedures on the territory. AIMA did not clarify the type of reception facilities provided by each organisation, nor did it give details on the number of asylum applicants each organisation received. It is not clear if and how many reception centres are specialised and specifically assigned to asylum applicants.	134, B. Housing 1. Types of accommodation	During the critical period following the creation of AIMA, and due to the exponential increase in the number of reception requests, AIMA resorted to the use of hostels and youth hostels as part of a contingency response. Progressively, throughout 2024, with major incidence as from august 2024, it was possible to phase out this contingency measure and accommodate applicants exclusively in reception centres, with a total of six centres in operation.
Nevertheless, challenges persist regarding registration with the Social Security, despite efforts from the authorities to simplify and digitalise processes through an online platform. Often the application is submitted online with all the required documentation and is rejected on improper grounds. According to CPR's observation, this may be related to inconsistent criteria used between officials in the analysis.	141, C. Employment and education 1. Access to the labour market	We do not have any data that supports this information. We needed more time to be able to better reply to this observation.
There is no up-to-date list of which CLAIMs are in operation, or contact details and opening hours.	142, C. Employment and education 1. Access to the labour market	Since mid-2024, AIMA, I.P., taking into account the paradigm shift in the way the Public Administration relates to foreign citizens and especially the goal of implementing reception, information and support spaces, aiming at coordinated local responses to the needs of migrants in different areas, has challenged CLAIM to expand its scope of action, moving further and solely from the traditional aspect

		of integration to facilitate regularization procedures through this decentralized structure. For 2025, in compliance with the Portuguese Government's Migration Plan (Measure 41) the expansion of this Network, spread throughout the national territory, is also one of AIMA's objective. Furthermore, information about CLAIM, such as contact details and opening hours, will soon be available on AIMA's website.
Portuguese Language training	142	Please consider " Plano Estratégico para a Aprendizagem de Português como Língua Estrangeira "
<i>In CPR's experience, the leaflet is distributed to asylum applicants and it is available at least in Portuguese, English, French, Russian and Arabic. The information contained however is brief and not considered user-friendly, particularly in the case of unaccompanied children.</i>	155, F. Information for asylum applicants and access to reception centres 1. Provision of information on reception	AIMA is aware of the limitations of the current leaflet and is working with the EUAA to implement new informational leaflets using the standard template. This will ensure the materials are more user-friendly and accessible, including for unaccompanied minors, while maintaining uniformity at the European level.

5. Detention of Asylum Seekers

Extract from the country report	Page and section	Comments
<i>In addition, despite the fact that responsibility for promoting special procedural guarantees that could lead to the release from detention lies with AIMA, it seems that the Agency has no decision-making power on the conditions and maintenance of detention of asylum applicants at the border.</i>	162, B. Legal framework of detention, 3. Detention of vulnerable applicants	We refer to the clarifications provided under the section, Overview of the main changes since the previous report update, page 27, Detention of asylum applicants, Detention of vulnerable applicants.
<i>Information collected by CPR on the basis of communications from the authorities and the legal assistance provided indicates the systematic detention of children accompanied by family members and for longer detention periods. In order for privacy and family unity to be respected to a minimum, the conditions in EECIT Lisbon do not allow for more than one family to be detained. CPR is aware of several households with minor children simultaneously subject to detention at EECIT Lisbon for almost a month in the end of 2024. As a result, families were</i>	162, 3. Detention of vulnerable applicants	We refer to the clarifications provided under the section, Overview of the main changes since the previous report update, page 27, Detention of asylum applicants, Detention of vulnerable applicants.

<i>divided into wards according to gender.</i>			
<i>During 2024, CPR observed that particularly vulnerable persons, such as pregnant women, sick people, victims of torture/violence and others, were held in detention, with no apparent adjustments implemented to respond to individual special needs. Despite CPR's efforts, most cases remained in detention for considerable periods of time.</i>	162, Detention of vulnerable applicants	3.	We refer to the clarifications provided under the section, Overview of the main changes since the previous report update, page 27, Detention of asylum applicants, Detention of vulnerable applicants.
<i>Despite the fact that CPR generally has full access to asylum applicants detained at the border, some difficulties have been observed regarding access to persons detained at the transit area of Lisbon airport mostly due to the lack of PSP personnel to escort applicants/legal officers. In the first semester of 2024, no access was granted to legal officers and it remained unclear how to gain access</i>	172, Access to detention facilities	3.	We refer to the clarifications provided under the section, Overview of the main changes since the previous report update, page 27, Detention of asylum applicants, Detention conditions.

6. Content of International Protection

Extract from the country report	Page and section	Comments
<i>In 2024, CPR continued to notice significant difficulties in booking appointments for the renewal of residence permits, which was exacerbated by the lack of response from AIMA's services.</i>	176, A. Status and residence, 1. Residence permit	It is important to note that these procedures are currently under review. AIMA's local offices (Lojas AIMA) have been progressively enabled to handle these requests, and efforts have been made to train staff to ensure adequate response capacity. Additionally, according to the procedures in place at CNAR, beneficiaries of international protection may spontaneously visit the centre and are attended to on the same day, subject to service availability.
<i>In addition, in 2024, it was reported to CPR that some AIMA front desk services across the country refused to renew documents for beneficiaries of international protection, referring them to CNAR in Lisbon.</i>	176, A. Status and residence, 1. Residence permit	Despite the constraints acknowledged by AIMA regarding the renewal of documents for beneficiaries of international protection outside Lisbon, Porto, and Coimbra, efforts have been made to progressively equip all AIMA branches to improve service delivery in this area and ensure greater accessibility for beneficiaries.
<i>AIMA did not provide information regarding the number of persons granted Portuguese nationality through naturalisation in 2024.</i>	183, A. Status and residence, 4. Naturalisation	AIMA has recorded 91 acquisitions of Portuguese nationality throughout 2024.
<i>In the framework of the provision of legal assistance, CPR has repeatedly observed several shortcomings in the cessation</i>	185, A. Status and residence, 5. Cessation	During the year 2024 AIMA did not issue any decisions regarding the cessation of international protection status. Therefore, we respectfully request that the paragraph in question be reviewed.

<i>proceedings including the lack of renewal of the residence permits while the cessation process was pending and the poor quality of the assessment conducted into the change in circumstances in the country of nationality. Indeed, the assessments conducted did not take into consideration the specific/individual circumstances of each person concerned as the same information was used for all persons meaning that it lacked an actual assessment of whether there was a significant and durable change in circumstances for each individual.</i>	and review of protection status	
<i>Until the end of October 2023, if the family member was in Portugal at the time of application, the sponsor had to apply for family reunification at the Asylum and Refugees Department of SEF, in Lisbon; it is not clear whether this has been transferred to AIMA's CNAR.</i>	188, 1.2 Family reunification procedure	Any beneficiary of international protection may request family reunification for relatives who are already in Portugal, and this request can be submitted in person at any AIMA service office.
<i>The Asylum Act states that a Portuguese passport for foreigners may be issued to beneficiaries of subsidiary protection who cannot demonstrably obtain a national passport unless imperative motives of national security/public order require otherwise.</i>	191, C. Movement and mobility, 2. Travel documents	Holders of Extraordinary Residence Permits, granted to family members of beneficiaries of international protection (Refugees or Subsidiary Protection), should also be included for the purpose of obtaining the Portuguese Passport for Foreign Nationals.
<i>AIMA did not provide information on the number of travel documents issued to beneficiaries of international protection in 2024.</i>	192, C. Movement and mobility, 2. Travel documents	In 2024, 69 Refugee Travel Documents (RTDs) were issued by AIMA to individuals holding Refugee Status.
<i>According to the experience of CPR, there have been challenges in getting appointments for the issuance of travel documents, in particular due to confusion over which service (AIMA or IRN) is responsible for the issuance.</i>	192, C. Movement and mobility, 2. Travel documents	The Refugee Travel Document is intended for individuals holding a Refugee Residence Permit and is issued by AIMA branches. The Portuguese Passport for Foreign Nationals is intended for individuals with a Subsidiary Protection Residence Permit or an Extraordinary Residence Permit (granted to family members of beneficiaries of international protection — Refugees or Subsidiary Protection). The issuance of this document falls under the responsibility of the Institute of Registries and Notary (IRN). This information is available in the Frequently Asked Questions about International Protection section of AIMA's website.

7. Additional remarks

In some parts of the document, references to “SEF” are still present instead of “AIMA”, which should be corrected to reflect the current institutional framework.

Portugal has been strengthening its international protection system, notably through the specialisation of the units responsible for the registration and examination of applications. Nevertheless, challenges remain, particularly regarding the absence of dedicated digital tools for case management, as well as the ongoing need to improve coordination among the various entities involved in the system.

We would also like to highlight the daily commitment of AIMA’s staff and leadership, which is driven by a continuous effort to improve and learn, while upholding the principle of legality and fulfilling the obligations undertaken by the Portuguese State in the field of international protection.

We also acknowledge the valuable work carried out by CPR and its contribution to the ongoing development of the international protection system, particularly in supporting applicants and producing technical and legal expertise.

Additionally, we would like to note that throughout the report, we identified some instances of repeated information which, at times, made the reading experience slightly confusing. We kindly suggest aiming for a more concise and structured presentation of content in future versions, which would certainly support a clearer and more effective analysis by readers.

We would also like to mention that the several references to assessments made up to five years ago hinder this report particularly since an extensive institutional change has occurred by the end of 2023 which lead, *per se*, to necessary substantial adjustments.