



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

AIDA IT_2025Reply

2. Asylum Procedure

List of authorities that intervene in each stage of the procedure, pg.21

Extract from the country report	Comments
Returns (voluntary and forced) Questura Prefecture	There is no match.

4. Determining authority page 22

Extract from the country report	Comments
Is there any political interference possible by the responsible Minister with the decision making in individual cases by the determining authority?	This statement appears to be unsupported and presented as a bare assertion, without any supporting sources. Moreover, it is incorrect, as the Territorial Commissions are autonomous and independent in their individual assessments, as provided for by Article 4(3-bis) of Legislative Decree No. 25/2008.

4.2 Training and quality assurance page 23

Extract from the country report	Comments
Since 2014, the CNDA has organised training courses based on the EUAA modules, in particular on "Inclusion", "Country of Origin Information" and "Interview Techniques".	Among others, the following training courses have been delivered through EUAA training modules: Evidence Assessment Medical Country of Origin Information (MEDCOI) The Reception Conditions Directive in the Pact on Migration and Asylum The New Asylum and Migration Management Regulation The Asylum Procedure in the Pact on Migration and Asylum Vulnerability in the Pact on Migration and Asylum Asylum Interview Method Interviewing Children Interviewing Vulnerable Persons Trafficking in Human Beings Gender, Gender Identity and Sexual Orientation



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

4.2 Training and quality assurance page 24

Extract from the country report	Comments
UNHCR takes part in the decisions, and any divergent opinion is noted in the minutes, which can be accessed by the applicant and by their lawyer. In all cases, when there are divergent opinions (usually that of the UNHCR), the decision is indicated as taken by majority and not unanimously.	The link with the previous paragraph is missing. It appears that part of the text may have been omitted. Furthermore, the statement that UNHCR is usually the actor expressing a dissenting opinion does not appear to be supported by data or sources. The current wording appears to suggest that the dissent is attributable solely to the UNHCR's position, whereas, within the collegial body, differing views are discussed and considered collectively with the aim of ensuring the most appropriate application of the legal framework to the specific case. Furthermore, it would be preferable to refer to the UNHCR-designated expert rather than to UNHCR, article 4 (3) of Legislative Decree No. 25/2008.

5. Short overview of the asylum procedure – footnote page 25

Extract from the country report	Comments
Article 15- quinquies (1) DL 145/2025 converted into L. 187/2024.	DL 145/2024.

5. Short overview of the asylum procedure- regular procedure page 26

Extract from the country report	Comments
According to ASGI's experience, due to the large number of simultaneous applications, the time limits are never respected in practice, and the asylum applicant is generally not informed about the authorities exceeding the deadlines.	In 2025, the Italian asylum system continued to address one of the highest numbers of international protection applications in Europe, following the significant increase recorded in recent years. It is inaccurate to state that applicants are not informed, as relevant information is provided both in person, following the interview or whenever applicants subsequently request further information, and via certified electronic mail (PEC).
Stakeholders in the field in Italy do not see any improvements as a result of these measures as of 2025: waiting times for hearings continue to increase.	An unsubstantiated assertion, considering that these efforts have been acknowledged at European level for their contribution to strengthening the capacity of the asylum system. https://www.euaa.europa.eu/asylum-report-2025/414-managing-caseloads-and-assessing-applications-international-protection



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Section 1.1.3.2 Libya, pg.36

Extract from the country report	Comments
On 2 February 2023, the Memorandum of Understanding between Italy and Libya, originally signed by Prime Minister Gentiloni and his Libyan counterpart Fayez al-Serraj on 2 February 2017 to reduce irregular migration flows, was renewed for the second time, after a first renewal in February 2020.¹¹³ The agreement provides for funding, equipment and technical support to the Libyan authorities, primarily the coastguard. It has never been counter-balanced by an effective evacuation mechanism from Libya, through UNHCR-managed resettlement or humanitarian corridors.¹¹⁴ The only functioning channel to exit Libya remains IOM-coordinated voluntary returns, offered to highly vulnerable individuals unable to make a genuinely free choice,¹¹⁵ while the Libyan system continues to rest on the systematic, indefinite detention of foreigners under conditions of torture and grave rights violations (see chapter on Detention conditions). For a fuller account, see the previous versions of this report.	Italy has been committed to coordinating evacuation programmes and humanitarian corridors since 2017. Between 2017 and 2019, in cooperation with the United Nations High Commissioner for Refugees (UNHCR), the Ministry of the Interior carried out six transfer operations involving migrants originating primarily from detention centres in Libya and subsequently relocated to UNHCR-managed camps. The beneficiaries were predominantly nationals of Eritrea, Somalia, Sudan, and Ethiopia. Since 2023, a more structured coordination framework for evacuation programmes and humanitarian corridors from Libya has been established. In particular, on 20 December 2023, the Ministry of the Interior, the Ministry of Foreign Affairs and International Cooperation, UNHCR, the National Institute for Health, Migration and Poverty (INMP), the Community of Sant'Egidio, the Federation of Protestant Churches in Italy (FCEI), and ARCI signed the Protocol for the Implementation of the “Humanitarian Corridors – Evacuations from Libya” Project. From the launch of the 2023 Protocol until the end of 2025, a total of 782 individuals were admitted under the aforementioned Protocol, out of the 1,500 admissions envisaged over a three-year period. As of 21 July 2026, the total number of admissions has reached 926. It should be noted that this Protocol is currently in its second edition. The first edition concluded on 30 November 2022 and facilitated the admission of 487 individuals, of whom 286 were received within the national reception system and 201 were accommodated by the sponsoring organizations.
Reference 228 See Sant'Egidio webpage here.	The redirection to the webpage is incorrect. The page in question is neither the official page of the Community of Sant'Egidio nor is it consistent with the information provided.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Humanitarian corridors are not regulated by law, but only by protocols between the Ministry of the Interior, the Ministry of Foreign Affairs and selected organisations, to which the Ministry delegates operations and the power to select the beneficiaries; no formal procedure for selection is established, nor any means to challenge non-admission.	With regard to Memoranda of Understanding, the selection procedure is managed by civil society organizations following referrals from UNHCR, where available. Ineligibility is determined through security checks carried out in accordance with the established procedures. Priority is always given to applications from vulnerable individuals and persons in need of international protection. As part of the transition to the URF, a more structured mechanism for collecting and assessing the information underpinning the selection process is currently being developed.
--	---

The Protocol between Italy and Albania page 42

Extract from the country report	Comments
The European Commission response to the Protocol has been ambiguous. When asked about the legality of the Protocol, the Commission first told reporters that it had asked Italian authorities for more detailed information regarding the exact scope and expected impacts of the arrangement, and that ‘this must be done without prejudice to the asylum acquis’. In any case, the protocol raises many questions about its compatibility with European Union Law and, more broadly, with international human rights law.	The issues concerning the compatibility of the Italy–Albania Protocol with European Union law have not yet been definitively resolved by the Court of Justice of the European Union. Although the Advocate General, in his Opinion delivered on 23 April 2026 in Case C-414/25, considered the Protocol to be, in principle, compatible with EU law, the Court’s final judgment was still pending.

Section 1.4 Legal access to the territory, pg.53

Extract from the country report	Comments
The main programme, promoted by the Community of Sant'Egidio together with the Waldensian Table, the Federation of Evangelical Churches and CEI-Caritas, brought 8,592 people to Italy between February 2016 and December 2025, Syrians fleeing the war and refugees from the Horn of Africa, Greece, Cyprus, Gaza and Afghanistan. According to UNHCR, over the ten years since 2015 some 11,000 refugees from 24 countries have reached Italy through humanitarian corridors more broadly. In parallel, Italy participates in the UNHCR resettlement programme: 2,805 refugees were resettled	The Department for Civil Liberties and Immigration coordinates legal pathways for entry, including the national resettlement programme and humanitarian admission schemes . Resettlement From 2015 to 2025, under EU-sponsored resettlement programmes, Italy admitted 3,024 refugees from Egypt (65), Jordan (346), Iran (134), Lebanon (1,412), Libya (70), Pakistan (141), Syria (52), Sudan (306) and Türkiye (498) .



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

between 2015 and 2025, the largest group from Lebanon (1,412), followed by Türkiye (446), Jordan (346), Sudan (306), Iran (102), Pakistan (72), Libya (70) and Syria (52). Since 2017, around 2,081 particularly vulnerable people have also been transferred from Libya through evacuations and resettlement (104 of them via Niger), a channel that had been suspended in 2023 and later resumed: on 11 December 2025, 122 refugees, mainly from Sudan, South Sudan and Eritrea, were evacuated to Rome.²²⁹

A specific channel was put in place for Afghan nationals. From 2021, in selected cases of Afghans fleeing the country after August 2021, the Ministry of Foreign Affairs allowed the persons concerned to apply for a humanitarian visa under Article 25 of the Visa Code (Regulation 810/2009). This first corridor, established through a Memorandum of Understanding of 4 November 2021, provided for the arrival of 1,200 Afghans over two years and enabled 812 Afghan citizens (refugees in Pakistan, Iran and Türkiye) to enter Italy.²³⁰ A new addendum, signed in April 2025, builds on the 2021 agreement and provides for a further 700 Afghan nationals (allocated among the Community of Sant'Egidio, CEI, the Federation of Evangelical Churches and ARCI); 338 people had already arrived by the time of signing, and a further group, including 119 people who reached Rome from Islamabad on 10 July 2025, followed thereafter.²³¹ Separately, between 2021 and 2022 a total of 4,797 Afghans were evacuated by the Italian Government through various operations, including Operation Aquila Omnia.²³²

Humanitarian admissions

Past initiatives

Between 2017 and 2019, in cooperation with the United Nations High Commissioner for Refugees (UNHCR), the Ministry of the Interior – Department for Civil Liberties and Immigration carried out six transfer operations from Libya and Niger, involving **913** migrants, mainly from Libyan centres and transferred to camps managed by UNHCR.

Humanitarian Corridors from Lebanon

The **Protocol for the implementation of “Humanitarian Corridors from Lebanon”**, signed on **26 September 2025** between the **Ministry of the Interior**, the **Ministry of Foreign Affairs and International Cooperation**, the **Community of Sant'Egidio**, the **Federation of Protestant Churches in Italy (FCEI)** and the **Waldensian Board**, has already had three editions:

- the **first edition**, signed on **15 December 2015**, was concluded with the transfer of **1,008 persons**, mainly Syrian nationals, during the period **2016–2017**;
- the **second edition**, signed on **7 November 2017**, ended on **29 March 2021** with the arrival of an additional **1,011 beneficiaries**, also mainly Syrian nationals;
- the **third edition**, signed on **5 August 2021**, was concluded on **24 January 2025** with the arrival of **1,039 beneficiaries**.

The **fourth edition** of the Protocol has a duration of **24 months from the date of the first arrival**, with the possibility of an extension of up to **12 additional months**, and provides for the admission of **1,000 beneficiaries**.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	Humanitarian Corridors from Ethiopia, Niger and Jordan The Protocol for the implementation of “Humanitarian Corridors from Ethiopia, Niger and Jordan”, signed on 18 October 2022 between the Ministry of the Interior, the Ministry of Foreign Affairs and International Cooperation, the Italian Episcopal Conference (CEI) and the Community of Sant’Egidio, provides for the transfer to Italy of 600 persons by April 2025. The parties agreed on a 24-month extension, including Türkiye as a transit country from which operations could be carried out. As of the end of 2025, a total of 249 persons had arrived under this Protocol. This Protocol is also currently in its third renewal: • the first edition, signed on 12 January 2017, concluded on 31 January 2019 with the arrival of 496 asylum seekers, mainly from Ethiopia; • the second edition, signed on 3 May 2019, concluded on 25 May 2022 with the arrival in Italy of 618 beneficiaries, including 383 from Ethiopia, 150 from Niger, 3 from Azerbaijan (via Türkiye), and 82 from Jordan. Humanitarian Corridors – Evacuations from Afghanistan The Protocol for the implementation of the project “Humanitarian Corridors – Evacuations from Afghanistan”, signed on 4 November 2021 between the Ministry of the Interior, the Ministry of Foreign Affairs and International Cooperation, UNHCR, the Italian Episcopal Conference (CEI), the Community of Sant’Egidio, the Federation of Protestant Churches in Italy (FCEI), the Waldensian Board, ARCI, IOM and INMP, provided for the arrival of 1,200 beneficiaries from
--	--



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	Pakistan, Iran, Türkiye, Jordan and Bosnia and Herzegovina within 24 months from the first arrival, which took place in July 2022, with the possibility of extending the duration to 36 months. Under this Protocol, 115 persons arrived from Iran, 629 from Pakistan and 68 from Türkiye, for a total of 812 beneficiaries admitted through the implementing organisations, which therefore reached their allocated quota. With regard to the quota managed by the public administration, 357 Afghan nationals were resettled and transferred to Italy from Iran, Pakistan and Türkiye, and accommodated within the national reception system. Following the conclusion of the above-mentioned Protocol, on 7 April 2025, the signing parties concluded an Addendum aimed at enabling the arrival of an additional 700 beneficiaries. As of the end of 2025, a total of 536 Afghan nationals from Pakistan and Iran had arrived under this Addendum. Humanitarian Corridors – Evacuations from Libya The Protocol for the implementation of the project “Humanitarian Corridors – Evacuations from Libya”, signed on 20 December 2023 between the Ministry of the Interior, the Ministry of Foreign Affairs and International Cooperation, UNHCR, INMP, the Community of Sant’Egidio, the Federation of Protestant Churches in Italy (FCEI) and ARCI, provides for a total of 1,500 admissions over three years (600 places managed by the SAI system and 900 by the implementing organisations). As of the end of 2025, the total number of arrivals under this Protocol amounted to 782 persons out of the 1,500 envisaged.
--	--



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	It should be noted that this Protocol is currently in its second edition: the first edition concluded on 30 November 2022 and resulted in the arrival of 487 persons, of whom 286 were accommodated within the national reception system and 201 by the implementing organisations. Other legal pathways coordinated by other stakeholders Legal entry channels coordinated by the Ministry of Defence Between 2021 and 2025, 7,008 Afghan nationals arrived in Italy through the evacuation operations Aquila I, Aquila Omnia and Aquila Omnia Bis. Transfers from Gaza Transfers from Gaza, between 2024 and 2025, coordinated by the Department of Civil Protection and the Ministry of Foreign Affairs and International Cooperation (MAECI), enabled the entry of 424 Palestinian nationals into Italy.
--	--

1. Regular procedure

1.1 General (scope, time limits) page 67

Extract from the country report	Comments
In practice, however, ASGI observed that the time limits for completing the regular procedure were not respected. DL no. 100/2026 recalls the rules laid down in the Asylum Procedure Regulation (APR), not expressly mentioning time limits.	The time limits have not been included, as the APR, being a Regulation, is directly applicable and no legislative intervention in this regard was considered necessary. The choice was therefore made to use the term provided for by the Regulation, which allowed Member States discretion to select a timeframe within the range established therein.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Termination and notification page 69

Extract from the country report	Comments
According to ASGI, the law transposing the rule concerning the implicit withdrawal of an application set out in Article 28 of Directive 2013/32/EU is not a correct implementation of art. 28 (2a) and 2b) considering the whole procedure in Italy and in particular two aspects: first, the information included in the C3 (lodging of asylum application) should not allow to issue a rejection decision, as it is not sufficient to carry out an adequate examination of the case on its merits; second, the law makes no reference to a reasonable time limit or to the reasonable times required by the Directive to consider the application as implicitly withdrawn.	The provision constitutes an exact transposition of the rules concerning the implicit withdrawal of an application provided for in Article 28 of Directive 2013/32/EU. Article 28 of the Directive provides as follows: Where there are reasonable grounds to consider that an applicant has implicitly withdrawn or abandoned his or her application, Member States shall ensure that the determining authority takes a decision either to suspend the examination or, where the determining authority considers the application to be unfounded following an adequate examination of its merits in accordance with Article 4 of Directive 2011/95/EU, to reject the application. 2. Member States may presume that the applicant has implicitly withdrawn or abandoned his or her application for international protection, in particular where it has been established that: the applicant has failed to respond to requests to provide essential information for his or her application pursuant to Article 4 of Directive 2011/95/EU, or has not appeared for the personal interview referred to in Articles 14 to 17 of this Directive, unless the applicant demonstrates, within a reasonable period of time, that this was due to circumstances beyond his or her control; the applicant has absconded or has left without authorisation the place where he or she lived or was detained, without contacting the competent authority within a reasonable period of time, or has failed, after the expiry of a reasonable period, to comply with the obligation to report or with other communication obligations, unless the applicant demonstrates that this was due to circumstances beyond his or her control. Finally, in Form C3, the applicant is given the possibility to submit additional written observations.
Furthermore, from a practical point of view, the procedure is made particularly	Under Article 11(2) of the Procedures Decree, “the applicant shall have the responsibility to inform the



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

problematic by the rules -and the way in which they are applied - envisaged for notifications which do not always guarantee effective knowledge for the asylum seeker.	competent authority of any change of residence or address. Furthermore, this issue is further strengthened by Regulation (EU) 2024/1348, which provides for specific obligations on the part of applicants for international protection and sets out the precise consequences arising from any failure to fulfil those obligations.
--	---

Termination and notification page 70

Extract from the country report	Comments
In addition, many ASGI lawyers have experienced problems with notifications of privately housed asylum applicants, as notifications had often not been made.	This is an unsupported assertion. It should be noted, first and foremost, that applicants do not always communicate changes in their personal details. In order to improve the notification system, the introduction of notification via certified electronic mail (PEC) has been expressly provided for.
3. Recommend to the Questura to issue a two-years “special protection” residence permit (see National forms of protection).	Complementary protection is the third autonomous form of protection. The decision is binding on the Questore for the purposes of granting protection and issuing the relevant residence permit (see Supreme Court judgment No. 5059/2017).

1.2 Prioritised examination and fast-track processing page 73

Extract from the country report	Comments
Practice showed that vulnerable applicants had more chances compared to other applicants - to benefit from the prioritised procedure, although this possibility is more effective when they are assisted by NGOs or they are identified as such at an early stage. The prioritised procedure is rarely applied to victims of torture and of violence, since these asylum applicants are not identified at an early stage by police authorities. In fact, torture survivors are usually only recognised as such in a later phase, normally thanks to NGOs providing them with legal and social assistance or during the personal interview by the determining authorities.	Unreferenced statements.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

1.2 Prioritised examination and fast-track processing page 74

Extract from the country report	Comments
As recorded by ASGI in February 2026, a woman was interviewed by audiovisual means while staying in a room with other people of the same nationality (Peru), who were awaiting to be heard as well and who could listen to her interview.	This statement is not supported by specific references enabling verification of where this occurred and the context in which it took place.

1.3.1 Interpretation page 75

Extract from the country report	Comments
In practice, based on ASGI's observations, there are not enough interpreters available and qualified in working with asylum applicants during the asylum procedure.	Unsubstantiated statement. While ensuring the availability of qualified interpreters for less common languages in Territorial Commissions located in more geographically remote areas may certainly represent a challenge, the statement in question constitutes an unsupported generalisation, particularly considering that CNA has organised specific training courses for interpreters in cooperation with EUAA and UNHCR.

1.3.2 Recording and report page 76

Extract from the country report	Comments
According to ASGI's experience, the quality of this report varies depending on the interviewer and the Territorial Commission, which conducts the interview. Complaints on the quality of the transcripts are common.	Unsupported statement.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Rules for the lodging of appeals page 78

Extract from the country report	Comments
In practice, asylum applicants who filed an appeal, in particular those who are held in CPR and those under the Accelerated Procedure, face several obstacles.	Unsubstantiated statement. The right to defence is always guaranteed, including access to free legal assistance, also for persons held in CPRs.

3. Admissibility procedure

3.1 General (scope, criteria, time limits) page 102

Extract from the country report	Comments
Even if the law distinguishes the phases of the preliminary assessment, attributed to the President, and the decision, attributed to the Commission, in some cases the Presidents of the Territorial Commissions have taken the decisions of inadmissibility on their own. With an interim decision of 1st March 2024, the Civil Court of Trieste clarified that such decisions of inadmissibility have to be taken by the Territorial Commission and not by the President. In other cases, according to ASGI's experience, CT Presidents have omitted the preliminary assessment... The exclusive role reserved for the President of the Territorial Commission, and not for the Territorial Commission itself, appears inconsistent with the Procedure Decree.	The information reported does not find any correspondence in the elements known to the National Commission. In this regard, it should be noted that serious criticisms are raised concerning the conduct of the Presidents of the Commissions, without, however, providing objective elements or evidence supporting the statements made, which would allow both the reader and the National Commission itself to understand their scope. Such elements could include, for example, references to appeals lodged challenging the conduct in question.

Border procedure- areas where the border procedure can be applied pag. 106

Extract from the country report	Comments
"According to ASGI, the way in which the Moi Decree was drafted adds other critical issues to the legal framework governing the border procedure. This is due to the fact that the provisions only generally refer to the "transit areas or border areas identified in those existing in the provinces" and does not clearly demarcate specific areas to this end, such as	Unsubstantiated statement. The report contains a statement but lacks the real and factual data on which it is based.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

ports or airport areas or other places coinciding with physical borders with extra EU countries, seem to conflict with the rules of the European Union and therefore to be illegitimate”	
--	--

Grounds for the border procedure to be applied pag. 106

ASGI observed how the wording of the provision could allow for automatic application of accelerated border procedure to persons seeking asylum at the border as it makes its application solely contingent on the person having tried to evade controls. In this sense the provision does not comply with Article 43 the Asylum Procedures Directive, as the attempt to evade border controls is not included in the acceleration grounds laid down in Article 31 (8) of the Directive which could lead to the application of a border procedure.	Part already highlighted in the CNA’s review in 2025. One might argue that the application of the border procedure is not automatic. An attempt to circumvent border controls, on the other hand, is one of the grounds provided for by European and national law to speed up the processing of applications. Article 31, paragraph 8 letter i) of Directive 2013/32/EU allows States to speed up procedures, and national legislation has transposed this prerequisite into Article 28 bis, paragraph 1 letter f).
--	---

Use of the border procedure and relevant caselaw pag. 108

Extract from the country report	Comments
The Civil Court of Trieste upheld the suspensive requests included in the appeals and observed that, contrary to what the Territorial Commission of Trieste assumed in its decree, there is no legal provision imposing to deny as manifestly unfounded asylum applications under the border procedure	It is specified that the Court of Trieste speaks of the absence of automatism between the border procedure and the rejection due to manifest groundlessness.

Accelerated procedure- 4.1 general pag. 111

Extract from the country report	Comments
“Regarding the accelerated procedure for persons investigated or convicted of crimes which may trigger exclusion from international protection, according to ASGI some issues of consistency can be observed, as	Period already reported in the CNA's observations of 2025. With respect to the alleged illegitimacy due to conflict with art. 27 of the Constitution, the aforementioned internal rules are valid and legitimate, since there has been no pronouncement of



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

already underlined regarding the old Article 32 (1-bis) of the Procedure Decree, now repealed: the procedure reserves a lesser treatment to persons not yet sentenced, contrary to the principle of innocence set out in Article 27 of the Italian Constitution. Furthermore, after the extension already made with the Decree Law 113/2018 and confirmed by the Decree Law 130/2020, the group of crimes that could lead to exclusion from international protection also included minor offences that do not seem to be a danger to public order and state security. In this sense the provision also seems incompatible with the recast Asylum Procedures Directive, Article 31(8) according to which an accelerated procedure can be applied to people considered dangerous for the public order according to the domestic law”	unconstitutionality or discrepancy with European legislation.
---	---

The immediate procedure pag. 112

Extract from the country report	Comments
“Under the immediate procedure, the Questura promptly notifies the Territorial Commission, which “immediately” proceeds to an interview with the asylum applicant and takes a decision accepting or rejecting the application. The law no longer provides for the possibility for the Territorial Commission to suspend the decision”	Period already reported in the CNA's observations of 2025. The content is incorrect. As indicated in the introduction in the same paragraph, the previous regulation of the immediate procedure has been repealed.

National form of protection protection 115

Extract from the country report	Comments
Significantly, the decree law 20 of 10 March 2023, converted with amendments into Law 50 of 5 May 2023, cancelled the possibility to directly request this kind of permit to a Questura and to consider, in releasing such permits to stay, if there are good reasons to believe that the removal from the national	Already reported in the 2025 observations. The current law is constitutionally legitimate and respects the international obligations assumed by Italy.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

territory involves a violation of the right to respect for his private and family life, unless that it is necessary for national security reasons, public order and safety as well as health protection. ⁵⁸⁰ Even if the amendment does not exclude the application of international and European guarantees, such as the application of Article 8 of ECHR, the new wording of the law has already lead, according to ASGI monitoring, to a significative limitation in the number of cases in which this form of protection is recognised. ⁵⁸¹ This was confirmed by the practice in 2024, as observed by ASGI.	
--	--

Guarantees for vulnerable groups- screening of vulnerability pag. 118

Extract from the country report	Comments
There is no procedure defined in law for the identification of vulnerable persons	There are specific guidelines for the identification and taking care of vulnerable people, for consultation please refer to https://www.interno.gov.it/it/stampa-e-comunicazione/pubblicazioni/vademecum-rilevazione-referral-e-presenza-carico-persone-portatrici-vulnerabilita-arrivo-sul-territorio-ed-inserite-nel-sistema-protezione-e-accoglienza .

Age assessment of unaccompanied children page 122

Extract from the country report	Comments
“L 47/2017 lays down rules on age assessment which apply to all unaccompanied children. The Law provides that within 120 days of its entry into force, a decree of the President of the Council of Ministers should be adopted regulating the interview with the minor aiming at providing further details on his family and personal history and bringing out any other useful element relevant to his/her protection. However, as June 2026, such a decree has not yet been adopted”	Decree of the President of the Council of Ministers (Prime Minister's Decree) No. 98 of 10 May 2024 was adopted, entitled "Regulation implementing Article 19-bis of Legislative Decree No. 142 of 18 August 2015, introduced by Article 5 of Law No. 47 of 7 April 2017...", published in the Official Gazette on 9 July 2024. Other official texts to be consulted for the application of Article 5 are the 2020 State-Regions Protocol for the medical part and Presidential Decree 191/2022 for the administrative part.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Age assessment of unaccompanied children page 123

Extract from the country report	Comments
“The age assessment is often required even in presence of identity documents and even when there is no reasonable doubt about the minor age. However, the law does not provide the timing for the decision and, pending the results, the minor is often treated and accommodated as an adult, therefore also in situations of Promiscuity with adults. Furthermore, the child is often not informed and involved actively in the procedures and he or she is not aware of the reasons for the examinations. On the other hand, a certainly positive element consists in the decrease of cases in which age assessment is requested by authorities not entitled to carry out such proceedings”	The law provides for a safeguard clause stipulating that “until the proceedings are concluded and the Court has issued its final decision, the asylum seeker shall be treated as a minor for all purposes under the law.

Special procedural guarantees pag. 124

Extract from the country report	Comments
The Procedure Decree foresees the possibility for asylum applicants in a vulnerable condition to be assisted by supporting personnel during the personal interview even though the legal provision does not specify which kind of personnel.⁶⁴⁹ During the personal interview, the applicant may (and is often the case in practice) be accompanied by social workers, medical doctors and/or psychologists.	In addition to the mandatory presence of the guardian and, if appointed, of the legal representative.

Timing of appointment page 127

Extract from the country report	Comments
“As pointed out in a report from Cespi published in March 2025, in two of the regions that receive the greatest number of unaccompanied minors (i.e. Friuli Venezia	Generalised and unsubstantiated statement



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Giulia and Sicily), some worrying practices are registered”

Definition and list of safe countries of origin page 134

Extract from the country report	Comments
“The law also requires that, by 15 January each year, the Council of Ministers submit a report that - while taking into account overriding security needs and the continuity of international relations - provides an update on the situation in the countries currently on the list, as well as those whose inclusion is being considered. The Government transmits the report to the competent parliamentary commissions. However, in 2025, the Government did not respect the established deadline and only transmitted the report on 1 April 2025.”	The report states that in 2025 the Government would not have met the deadline of 15 January, having transmitted the report on 1 April 2025. The statement is factually correct, if it refers to the parliamentary transmission. The official Senate ballot indicates that document CCXXXIX No. 1 was presented and announced on April 1, 2025. The rule establishes that the Council of Ministers deliberates by 15 January and that the Government transmits the report to the Parliamentary Committees. The AIDA text seems to overlap the deadline for the deliberation of the Council of Ministers with that of parliamentary transmission. This distinction is important: from the presentation on 1 April, it does not automatically follow, without examining the acts of the Council of Ministers, that the resolution also took place after the deadline. The document was transmitted to Parliament on 1 April 2025. It should be noted, however, that Article 2-bis, paragraph 4-bis, distinguishes the resolution of the Council of Ministers, to be adopted by 15 January, from the subsequent transmission to the Parliamentary Committees. The date of parliamentary submission alone is not sufficient to prove the date of the government deliberation.
the compatibility of the new legislation with EU law as interpreted by the CJEU	Judgment C-406/22 provided a general interpretation of Articles 36 and 37 of Directive 2013/32/EU; He did not directly declare the Italian list illegitimate. The incompatibility of the national list has been assessed by the Italian court in the context of the individual proceedings



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Definition and list of safe countries of origin page 135

Extract from the country report	Comments
“This applies even where, as in the Italian case, the designation as safe country was made by law.⁷¹⁷ Since people subject to the Albanian procedure were those subject to the border procedure, i.e. asylum applicants coming from safe countries of origin or evading border controls, the CJEU decision directly affected transfers to Albania as in most cases the country of origin of rescued people could no longer be included in the safe countries of origin list”	AIDA reports that the CJEU has ruled that it is impossible to designate a safe country when the requirements are not met for certain categories of people, even if the designation is made by law, adding that the ruling would have directly affected transfers to Albania. The judgment of 1 August 2025 clarified the legal criteria for the designation and the powers of review of the court. The statement that, following the ruling, "in most cases" the countries of origin could no longer have been included in the list is instead a conclusion of the authors, not directly contained in the judgment and not accompanied by quantitative data or a country-by-country analysis.
“Following the entry into force of the safe countries of origin list, the CNDA issued two circulars, on 28 October 2019 and 31 October 2019, giving directives to the Territorial Commissions on the application of the new provisions. In particular the CNDA assumed that the inclusion of a country of origin in the safe countries list introduces an absolute presumption of safety, which can be overcome only with a contrary proof presented by the asylum applicant. CNDA also underlined that, in the event of rejection, the applications should always be regarded as manifestly unfounded applications”	AIDA attributes to the CNDA circulars of 28 and 31 October 2019 the assumption that inclusion in the list would introduce an "absolute presumption of safety", which can only be overcome by proof to the contrary offered by the applicant. It also adds that the CNDA has stated that, in the event of rejection, the claims should always be regarded as manifestly unfounded. The qualification of the presumption of security as "absolute" is not correct. The country designation operates as a rebuttable presumption and does not exempt the determining authority from the individual examination of the application, the assessment of the reasons specifically put forward by the applicant and the use of relevant and up-to-date country of origin information. The burden of alleging individual reasons does not result in an exclusion of the authority's duty of investigative cooperation. As for the manifest groundlessness of coming from a safe country of origin, it does not imply an automatic decision. The classification of the application as manifestly unfounded presupposes that, at the end of the individual examination, the applicant has not put forward serious reasons capable of rebutting the rebuttable presumption of certainty.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Case law page 137

Extract from the country report	Comments
“By Decree of 7 October 2022, the Civil Court of Rome suspended the effects of the rejection notified to an asylum applicant from Tunisia whose asylum request was considered manifestly not founded due to the country of origin of the applicant, stating that Tunisia cannot be considered a safe country of origin for those who allege fear of persecution due to sexual orientation”	The report recalls precautionary decisions relating to LGBT applicants from Tunisia and Senegal. However, it is necessary to avoid individual precautionary measures being presented as general declarations of non-security of the entire country. The rulings referred to concern specific individual positions and, in some cases, the precautionary phase. They confirm the need to assess the applicant's personal circumstances, but do not necessarily amount to a general declaration of invalidity of the country designation.
“On 20 September 2023 the Civil Court of Florence suspended the effects of a rejection notified to an asylum applicant from Tunisia. The court noted that, under the Asylum Procedure Directive Article 37 (2), the sources based on which a country is included in the safe countries list must be constantly updated and the inclusion itself should be subject to review if there is a change of the situation in the country. Moreover, national law (Article 3 of Qualification Decree and Articles 8 and 27 (1 bis) of the Procedure Decree) requires the judge to examine the asylum application on an individual basis, in light of precise and updated information about the general situation existing in the country of origin of asylum applicants. According to the Court, the need for an updated evaluation does not only concern the merit of the international protection application but also the usability of the "safe countries procedure", which involves a series of more burdensome procedural peculiarities for the asylum applicant. According to the Court, the sources on the current security conditions in Tunisia highlight a crisis of the democratic system of the country considering, in particular, the mass arrests, the suspension of numerous judges and the non-transparency of the elections. The updated situation does not	The report states that the Court of Florence, having assessed the Tunisian situation, considered the decree on safe countries "ineffective" and ordered the application of the ordinary procedure. The translation "the Safe countries decree becomes ineffective" seems too broad. It should be noted that the decisions referred to have produced effects in the individual proceedings submitted to the court. The expression according to which the decree has become "ineffective" is likely to be understood as a general loss of effectiveness of the designation, a consequence that does not appear to derive from individual precautionary measures.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

allow, according to the Court, to consider compliance with the principle of non-refoulement in case of repatriation to Tunisia. Therefore, the Safe countries decree becomes ineffective, and the appeal has to be subjected to an ordinary procedure with the automatic right of the appellant to remain in the national territory until the appeal is decided. By 3 other Decrees issued immediately after the latter, in October 2023, the Civil Court of Florence confirmed the previous positioning	
--	--

Management and Coordination page 145

Extract from the country report	Comments
In the perspective of national coordination and multi-level governance of reception, several institutional acts have also been taken, beginning with the approval of a National Operational Plan by the Unified Conference ⁷⁷⁸ of 10 July 2014, ⁷⁷⁹ which represented a first attempt to develop a system of planning, organisation and national management of the reception of migrants and refugees. The fundamental aspect on which the implementation of the Plan was based was the progressive overcoming of the emergency-focused management that had characterised the Italian reception system until then	It should be noted that, in 2025, with regard to the management and allocation of reception system, that the Contingency Plan was updated in April 2025, in accordance with Article 32 of Directive (EU) 2024/1346. On 8 April 2025, the SUA system became operational. This IT application was developed to support the actors involved in the management of migration flows by providing a single, integrated platform for the management of the reception system, international protection procedures, Dublin procedures, and assisted voluntary return and reintegration procedures. The SUA system has consolidated the previously separate IT systems — SGA, VESTANET, DUBLINET, and RVA — into a single database and unified management interface. The system is continuously updated through an interoperability interface with the SIA Sbarchi platform, which provides data on arrivals by sea. Furthermore by departmental decree of 8 October 2025, subsequently replaced by a corresponding decree of 11 November 2025, the National Technical Working Group on Vulnerabilities was established (hereinafter, the National Working Group), as a formal technical and operational body of coordination involving all competent authorities, with the purpose of promoting an integrated and coordinated approach



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	to the management of vulnerabilities and of giving practical effect to the general principles laid down in the Handbook for the Identification, Referral and Care of Persons in Vulnerable Conditions, Arriving on the Territory and Enrolled in the Protection and Reception System (hereinafter, the Handbook). In implementation of the Handbook, as from 2023 the Italian Prefectures have been called upon to establish Local Working Groups on Vulnerabilities, entrusted with the task of developing and monitoring the implementation of Standard Operating Procedures (SOPs) at territorial level.
--	--

Monitoring page 147

Extract from the country report	Comments
As to the latter, although the specifications scheme provides the common national reference for services, it remains an administrative tender document setting only quantitative indications, and is therefore inadequate as a reference for a thorough inspection.	This statement should be qualified in light of the March 2024 tender specifications. Article 19(3) expressly provides that inspections must be carried out without prior notice and are intended to verify both the qualitative and quantitative compliance of the goods supplied and services delivered with the contractual technical specifications. Furthermore, Article 19(4)(e) requires inspections to assess the effectiveness and quality of general assistance services, as well as the adequacy of services provided to persons with special needs and to minors. Article 19(4)(f) further requires inspectors to verify the effective accessibility and usability of services and whether human and material resources are continuously adapted to the evolving needs of the reception facility. Accordingly, the current tender specifications establish both quantitative and qualitative inspection criteria as well as requiring Prefectures to verify the regularity of the documentation collected for the purpose of paying for the services provided (Article 19, paragraphs 5 and 6), and to take action in cases where discrepancies are identified with respect to contractual obligations through the procedures set out in Article 21 (the issuance of recommendations and challenge



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	procedures, the imposition of financial penalties, commissioner measures, contractual termination measures). In the interests of optimal implementation and standardization of the methodology, the DCLI published the "Guidelines - Monitoring of Reception Conditions and Services" in 2022 and, for the purpose of more uniform implementation and sharing best practices, also carries out joint monitoring activities with the inspection units of the Prefectures.
"Italian Prefectures have historically lacked both a qualitative-quantitative tool specifically designed for inspections and uniform standards of evaluation."	Recent reforms, including Article 19 of the March 2024 tender specifications and the introduction of the SMAcc monitoring system, aim to reduce this fragmentation and to standardise verification and intervention procedures in cases where breaches or non-compliance are identified, while ensuring the consistent protection, safeguarding, and maintenance of adequate reception standards across the system.
As a centralised database, SMAcc allows the DCLI to monitor and analyse the results of local-level monitoring activities conducted by prefectures, creating a comprehensive national overview of reception conditions and compliance.	While SMAcc serves as a centralised database for collecting and analysing monitoring data, its role goes beyond data aggregation. In line with Article 19 of the March 2024 Tender Specifications, the platform supports a more harmonised and transparent monitoring system by providing standardised inspection tools, digital checklists and common reporting procedures, thereby promoting greater consistency in the assessment of contractual compliance across Prefectures. SMAcc also supports the entire compliance process, from the identification of findings and corrective measures to the verification of remedial actions, contributing to the effective implementation of reception contracts and the continuous improvement of service quality, as required by Article 19(3) and Article 19(4)(e)-(f). In addition, by collecting not only data arising from monitoring visits but also information relating to sanctions, notices of breach, penalties imposed by the competent authorities, and, where applicable, by allowing the upload of all supporting documentation produced during inspections, SMAcc also serves as a valuable historical repository of monitoring activities within the national reception system. As such, it represents an essential tool for transparency, tracking



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	and institutional memory, supporting Prefectures in ensuring continuity and consistency in monitoring activities, including in cases of staff turnover among personnel responsible for these functions. More recently, the platform has been enhanced through the introduction of a dedicated section containing iconographic and practical guidance materials. This feature supports the capacity-building of reception providers by helping them address shortcomings identified during inspections and improve compliance with contractual requirements. SMAcc is also a continuously evolving platform: its tools, checklists and monitoring features are regularly updated to reflect legislative developments and changes to the regulatory framework, ensuring that monitoring activities remain aligned with the applicable legal and contractual standards.
--	--

Monitoring page 148

Extract from the country report	Comments
Furthermore, Prefecture staff are usually not trained before conducting inspections and are often unfamiliar with the issues of forced migration, the right of asylum, and vulnerability-related issues	This statement should be qualified. 1) In order to fulfil its institutional mandate and in line with the Ministry's annual objectives, the Central Directorate for Civil Liberties and Immigration regularly organises dedicated training activities for Prefecture staff involved in monitoring reception facilities. These training programmes include sessions on the legal framework governing the reception system, the methodological and operational aspects of monitoring, and the use of the SMAcc platform for verifying reception conditions. Specific training is also devoted to the identification and management of vulnerabilities, including the guidance set out in the Vademecum on Vulnerabilities, published by the Ministry in 2023 and subsequently incorporated into the monitoring approach reflected in the March 2024 Tender Specifications. 2) in addition to the training activities regularly organised for Prefecture staff, the Department for Civil Liberties and Immigration (DCLI) has worked in close coordination with UNHCR, UNICEF and EUAA to strengthen the monitoring framework by



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	updating the inspection annexes and checklists in line with the Technical Note on the Prevention and Response to Gender-Based Violence. The revised checklists have been incorporated into the SMAcc platform, ensuring that inspectors have access to harmonised and up-to-date monitoring tools that reflect current protection standards and support the identification of vulnerabilities and gender-based violence risks during inspections. Finally, including through the organisation of joint monitoring activities, the Department for Civil Liberties and Immigration (DCLI) supports Prefectures through on-the-job training, as these initiatives have proven to be an excellent opportunity for capacity building and the dissemination of good practices and standardised methodologies for assessing the adequacy of reception conditions, as well as for promoting the correct use of SMAcc tools and annexes. This contributes to greater transparency and a more systematic approach to data collection. These initiatives ultimately demonstrate the Department's commitment to continuously strengthening the technical capacity of monitoring activities and ensuring that inspection tools evolve in line with emerging protection standards, legislative developments and operational needs.
the Prefect appoints a commissioner for the extraordinary and temporary management of the enterprise. In parallel, the Prefect should initiate the necessary procedures for the direct award of a new contract for the supply of goods and services	The description of the monitoring system would benefit from a more comprehensive account of the contractual framework introduced by the March 2024 Tender Specifications. The monitoring mechanism established therein is not limited to identifying breaches of contractual obligations but is designed as a progressive compliance process aimed at ensuring the effective delivery and continuous improvement of reception services. In particular, Article 19 provides that inspections are carried out without prior notice and are intended to verify not only compliance with contractual obligations, but also the qualitative and quantitative adequacy of the goods supplied and services delivered in relation to the technical specifications (Article 19(3)). The inspections further assess the effectiveness and quality of general assistance services, the adequacy of services provided to persons



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	with specific vulnerabilities and to minors, as well as the actual accessibility and usability of services, including whether human and material resources remain appropriate to the evolving needs of the reception facility (Article 19(4)(e)-(f)). The contractual framework also establishes a structured escalation process for addressing non-compliance. Where shortcomings are identified during inspections, the Prefecture formally notifies the contractor of the findings (contestazione) and may issue specific corrective measures (prescrizioni) identifying the actions required to restore compliance. The contractor is granted a defined period within which to implement the necessary corrective actions and demonstrate compliance with the contractual requirements. The Prefecture subsequently verifies whether the prescribed measures have been effectively implemented and whether the quality and effectiveness of the services have been restored. Where deficiencies persist or contractual obligations continue to be breached, the Tender Specifications provide for the progressive application of contractual remedies, including financial penalties, and, in the event of serious or repeated non-compliance, termination of the contract, in accordance with the contractual provisions and the applicable public procurement legislation. Accordingly, the monitoring system introduced by the March 2024 Tender Specifications should be understood not merely as an inspection mechanism, but as a structured contract management framework combining verification, corrective action, follow-up monitoring and, where necessary, proportionate enforcement measures, in compliance with the provisions set forth by national and European legislation. Its primary objective is to ensure that reception services are delivered effectively, in compliance with contractual standards and in a manner that safeguards the rights and needs of accommodated persons.
--	---



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

A. Access and forms of reception conditions

1. Criteria and restrictions to access reception conditions page 150

Extract from the country report	Comments
Onward appeal ♦ Subsequent application	In the first case, no reduction of the material reception conditions is provided since, where the applicant has been authorised by a judicial authority to remain in the national territory, he is entitled to access the material reception conditions. In the second case, by contrast, Legislative Decree No. 142 of 2015 provides for the withdrawal of reception conditions, rather than their reduction.

4.1 Dispersal of asylum applicants page 162

Extract from the country report	Comments
Data from page 162 171	“occupancy” of Hotspot, CAS and Government centers were provided in a request for civic access but refer, as well specified in the response to the request, to the capacity of the places of the centers not to the applicants present, as erroneously written

Housing page 165

Extract from the country report	Comments
Type of accommodation most frequently used in an accelerated procedure	Please add “in accelerated border procedure”

Conditions in the reception facility page 174

Extract from the country report	Comments
Decree Law 130/2020 maintained the distinction between a range of services addressed to asylum applicants and others reserved exclusively to beneficiaries of protection	Replace with: “Decree Law 130/2020 maintained, within the SAI system, the distinction between first-level services for asylum applicants and second-level integration services reserved for beneficiaries of international protection.” In fact, the first sentence appears legally inaccurate. Decree Law 130/2020 maintained the distinction between first-level and second-level services only within the SAI system, not throughout the reception system. In addition, the subsequent statement (“contrary to a logic of generalised protection... slowing down the process of regaining self-sufficiency”) is evaluative rather than



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	descriptive and should either be supported by an explicit source or reformulated in more neutral terms.
--	---

Conditions in the reception facility page 175

Extract from the country report	Comments
only services relating to food, accommodation, clothing, healthcare and linguistic-cultural mediation are ensured	Replace with “the mandatory services are substantially limited to”;

Conditions in the reception facility page 174 175

Extract from the country report	Comments
According to Article 2 of the tender specifications’ schemes, psychological assistance, Italian language courses and professional training, legal and territorial orientation, are listed as possible subcategories of social assistance, but there is no obligation for the service provider to ensure their accessibility to asylum applicants	Replace with: “According to Article 2 of the tender specification schemes, psychological support, Italian language courses, vocational training, legal assistance and territorial orientation may be provided within the framework of social assistance. Although these are not established as dedicated mandatory integration services under the CAS procurement model, service providers are required to ensure social assistance, including orientation and referral to locally available services”

Conditions in provisional centers - Page 180

Extract from the country report	Comments
Starting from the first half of August 2023, two temporary camps, consisting of container tents and gazebos, were set up in Parma, the Martorano and Cornocchio camps.	Cornocchio is not yet a reception facility for asylum seekers and Martorano is not yet a provisional center but a CAS.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

Specialized treatment for vulnerable group – page 184

Extract from the country report	Comments
Following the period: The Ministry of Interior has clarified that the Guidelines on assistance and rehabilitation of refugees and subsidiary protection beneficiaries, victims of torture or serious violence, issued by Decree on 3 April 2017 to implement Article 27(1-bis) of the Qualification Decree, also apply to asylum applicants (see Content of Protection: Health Care).	The section could be updated to reflect the developments in 2025 concerning the identification and referral of vulnerable persons. In particular, the report could mention the establishment of the National Technical Working Group on Vulnerabilities, the role of local vulnerability coordination mechanisms established by Prefectures, and the implementation of the Vademecum on the identification, referral and reception of persons with specific needs, including through Standard Operating Procedures (SOPs). These developments are relevant also in the context of hotspots and first reception facilities.

Reception of unaccompanied minors page 189

Extract from the country report	Comments
The interventions in favour of unaccompanied foreign minors are also funded by resources from the European Asylum, Migration and Integration Fund (AMIF) 2014-20201010 and 2021-2027.	It is important to point out that only 50% of the Fund is European, the remaining 50% is National funding.

2.1 Dedicated facilities for unaccompanied children Pages 190+191

Extract from the country report	Comments
To the second level accommodation facilities belong: ❖ the SAI system facilities, financed with the National Fund for Asylum Policies and Services; ❖ reception facilities financed with AMIF resources and intended as secondary level facilities;	A single point would be appropriate to better clarify that SAI projects are financed with the National Fund for Asylum Policies and Services and some with AMIF.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

2.1 Dedicated facilities for unaccompanied children. SAI Page 192

Extract from the country report	Comments
Following legal action initiated by ASGI the cessation of international protection by NAC in a few of such cases has been cancelled, even if the provision is still in place.	MSNAs are welcomed into the SAI even without first being welcomed into initial reception projects, based on the presence of minors within initial reception facilities, as highlighted in the <u>Vademecum UAM updated to June 2025</u> .

2.1 Dedicated facilities for unaccompanied children. First reception centres and CAS for unaccompanied children Page 193 -

Extract from the country report	Comments
The system of first reception outlined by Law 47/2017 and Reception Decree remains substantially unrealised, constituting one of the parts of the legislation with respect to which reality is further away from legal provisions. The decree of the Ministry of the Interior that should regulate the government structures of first reception for minors accompanied has not been issued as of March 2025.	The centres financed by the Migration and Integration Asylum Fund (AMIF) perform exactly the function of government first reception centres, as outlined by Law 47/2017 and Reception Decree. It is requested to specify which is the Decree that has not been issued. The Ministerial Decree issued on the 1 st of September 2016 "Establishment of government first reception centres dedicated to unaccompanied foreign minors" is governing the first level of UAM reception facilities and implementing the provisions set out in article 19, paragraph 1, of Legislative Decree No. 142/2015.
In the absence of the first government reception centres, this phase is in fact covered by different types of structures: the most similar in standards to the regulatory provision, the centres financed by the Migration and Integration Asylum Fund (AMIF) and centrally managed by the Ministry of the Interior; the extraordinary reception centres set up by the Prefects (c.d. CAS minor) and managed by the Prefectures; family homes and socio-educational communities managed by individual Municipalities.	It is important to point out: The first level of reception system, according to the standards set by the regulatory framework, includes the centres funded through the Asylum, Migration and Integration Fund (AMIF) and centrally managed by the Ministry of the Interior; the Extraordinary Reception Centres for Minors (CAS for minors), established by the Prefects and managed by the Prefectures; as well as family homes and socio-educational communities operated by individual municipalities.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

1.4. Detention for identification purposes 205

Extract from the country report	Comments
As those dedicated premises have never been identified, detention for identification purposes occurs de facto in hotspots. In Lampedusa, ASGI and other civil society organisations have reported that the centre gate is constantly closed and migrants are able to leave the centre only through openings in the fence, regularly adjusted by the administration and then reopened by migrants. More broadly, people taken to Lampedusa are de facto detained on the island, considering that they cannot purchase a title of travel and leave without an identity document.	the situation of the hotspot of Lampedusa has significantly improved since 2023 thanks to the management of the Italian Red Cross: with a view to reorganizing the management of the Lampedusa Hotspot, also in light of the increase in arrivals on the island, and pursuant to Article 5-bis, paragraph 2, of Decree-Law No. 20 of 2023, an agreement was signed on 24 May 2023 with the Italian Red Cross (hereinafter "CRI") entrusting it with the provision of reception services at the aforementioned hotspot. The agreement entered into force on 1 June 2023 and was originally set to remain effective until 31 December 2025. It has since been further extended until 31 December 2027, without prejudice to the Administration's right to terminate it early in the event of overriding public interest or the introduction of new legislative provisions. The CRI has continued to manage the facility, resulting in an overall improvement in the services provided at the hotspot, both in terms of the management of reception procedures and the maintenance and administration of the various premises. The current accommodation capacity of the facility is 640 places. it is worth to mention that the stay in hotspot centers is very short and that the average duration is 48 hours, just for the identification procedure.

3.1 Detention of unaccompanied children page 208

Extract from the country report	Comments
The law explicitly provides that unaccompanied children can never be detained. However, there have been cases where unaccompanied children have been placed in CPRs following a wrong age assessment. Minors, both accompanied and unaccompanied, are also de facto detained in hotspots and, in the context of the COVID-19 pandemic, on quarantine vessels.	UAMs are never detained in the CPR. The cases reported by ASGI are not updated and concern rulings relating to events that occurred in 2016.



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

2.3 Health care and special needs in detention page 233

Extract from the country report	Comments
In April 2024, simultaneous visits were made to all the CPRs in Italy, which confirmed the problems and shortcomings already highlighted earlier: overcrowding in accommodation units, isolation alternating with a lack of privacy, poor and unhealthy quality of meals, critical hygiene and sanitary conditions, lack of cooperation protocols with health bodies and voluntary associations, and a shortage of specialised staff such as cultural mediators, psychologists and health personnel. The latest report by the Tavolo Asilo e Immigrazione (TAI) reached the same conclusions, based on numerous visits to Italian reception centres for asylum seekers (CPRs) during 2025. The security approach to administrative detention makes CPRs places of extreme social marginality and isolation from a community which is prevented from entering detention facilities and creating relationships with detainees. The people detained in CPRs live in a condition of permanent forced idleness, where even small daily life choices, such as reading a book, writing, or playing sports are limited and regulated.	In no case do situations of overcrowding occur, as the number of places is predetermined and cannot be exceeded. In cases where, following acts of deliberate damage, some premises become unusable, the occupants are transferred, where necessary, to other CPRs. Regarding the reception conditions within the CPRs, it is highlighted that the Ministry of the Interior and the Prefectures constantly carry out inspection activities to verify the reception conditions. In cases where, during monitoring visits, it is found that the managing entities do not comply with the contractual provisions, penalties are applied. In order to protect the health of detained persons, the Prefectures have signed memoranda of understanding with the Local Health Authorities (ASL) to assess, from a health perspective, the protection of the guests' health, and have signed protocols with voluntary associations to introduce recreational activities (football pitches, painting activities and libraries to allow reading). During monitoring visits, people interested in reading have rarely been encountered, despite the availability of books, and access to sports fields is necessarily regulated in order to allow all those present to use them. In all CPRs, television viewing is available. In two centres, a room equipped with gym equipment is also available.

2.3 Health care and special needs in detention page 235

Extract from the country report	Comments
The monitoring of psychiatric cases and the administration of psychotropic drugs is often managed by psychologists and nurses appointed by the managing body, with no involvement nor supervision of local health authorities. It has been noted how the percentage of detainees subjected to the	Due to the sensitiveness of these issues, in light of the findings of the monitoring visits carried out in 2025 and in order to prevent the widespread of this shortcoming, in 2026 his Department has initiated a fruitful collaboration with the National Institute for Promoting the Health of Migrant Populations and Combating Poverty Diseases (INMP, a public body



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

administration of psychotropic drugs and anxiolytics is very high. As an example, in Milan's CPR, this percentage reaches - according to the managing body itself - 80% of the total detainee population. This situation is made even more concerning by the lack of connection with the local ASL and, therefore, the total absence of adequate psychiatric assistance. The critical nature of the situation is well illustrated by a survey conducted in 2023 on the abuse of psychotropic drugs within the Italian CPRs, which found that at the Milan CPR, in the period between October 2021 and February 2022, while spending on psychotropic drugs exceeded 60% of the total amount of drugs purchased, only 8 psychiatric visits were made to detainees. In Turin's CPR, according to the medical director of the facility, "psychotropic drugs are used by the litre", but without adequate monitoring, considering that throughout 2020 no psychiatrist has ever visited the facility. In 2021, collaboration with the Mental Health Centre of the local ASL resumed; regardless, visits in these cases are also on call, so there is no constant care of the patient, which tends to be replaced by the constant and continuous administration of psychopharmacological therapies.¹³¹¹ In Rome's CPR, according to the competent health authority, the percentage of detainees who are given psychotropic drugs and anxiolytics is 65-70%. In Gradisca's CPR, according to data provided by the regional Guarantor, 70% of the detained population is subjected to therapies requiring the administration of psychotropic drugs and tranquilisers. The abuse in the administration of psychotropic drugs, which is apparent in most CPRs, can be traced back to the absence of a connection with the national health system and to the management of health services entrusted to private bodies, with the risk of bending medical and pharmacological intervention to the needs of discipline and security of the facilities

established by Article 14, paragraph 3, of Legislative Decree no. 158/2012), aimed at verifying, with qualified personnel, the standards of health services. This activity was conceived primarily with a view to technical and advisory support, with the aim of promoting the continuous improvement of the quality of healthcare guaranteed within the CPRs. Visits are conducted based on indicators divided into the following areas of interest: entry health screening, health presidium, health card, access to care, mental health, medications, health emergencies, environmental hygiene, food, health rights, health personnel, critical events. In the case of the Turin CPR (subject of visit on June 25th), the health service was considered formally suitable in its basic structure, with practices defined in collaboration with the territorial and emergency specialist services and adequate integration of the services with regards to psychiatric evaluations with the presence on site of the psychiatrists of the territorial CSM who carry out specialist visits to prisoners, quality of service element worthy of valorization and replication. From the point of view of the administration of psychotropic or anxiolytic drugs, no use contrary to the principles of the practice of the healthcare profession has been observed. Even in the case of Milan (visited on June 24th), it was found that the health service is formally adequate in its basic structure, with excellent practices in collaboration with local specialist services. In relation to medications, attention has been paid by healthcare personnel in the management of medications, particularly psychotropic ones. In particular, it is important to emphasize the good practice of adhering to the prescriptions of the ASST Department of Mental Health/SerD for all patients treated with psychotropic drugs.

Regarding the administration of medicines, including the possibility of adjusting the type of medication and dosages, prescriptions may be issued by the physicians of the Managing Body, who—in any event, as physicians registered with the Medical Association—have the authority and professional prerogative to prescribe all general medications in accordance with their professional judgment and



Ministero dell'Interno
Dipartimento per le Libertà Civili e l'Immigrazione

UFFICIO Relazioni internazionali

	conscience, particularly in emergency situations or whenever a modification of a therapy previously prescribed in a specialist setting is required. Exceptions are made for certain medications subject to specific prescribing regulations (such as methadone), a requirement that is in any case fulfilled by the presence of the SerD (Addiction Services) within the facility.
--	--

A. Status and residence page 247

Extract from the country report	Comments
Following legal action initiated by ASGI the cessation of international protection by NAC in a few of such cases has been cancelled, even if the provision is still in place.	Unsubstantiated statement, as it is not sufficiently detailed to allow for verification.

5.2 Cessation procedure page 254

Extract from the country report	Comments
In a case recorded by ASGI in early 2024, the cessation procedure was started, according to Article 9 (1 lett. a) because the refugee was found in possession of his national passport. The procedure is ongoing before the NAC.	Unsubstantiated statement, as it is not sufficiently detailed to allow for verification.