

## Policy Position on the EU Return Regulation and the Implementation of the Pact on Migration and Asylum - ALDA Migration Hub

June 2026

### Local Democracy at the Heart of European Migration Governance

The [European Pact on Migration and Asylum](#) entered into application on **12 June 2026**, introducing one of the most significant restructurings of EU migration governance in the past decade. The Pact reshapes key areas including asylum procedures, border screening, reception conditions, solidarity mechanisms, integration pathways, and return policies.

Just days later, the European Parliament adopted the [EU Return Regulation](#), reinforcing and expanding the EU framework on return and readmission. The Regulation introduces stronger coordination between Member States, expanded cooperation with third countries, and a wider use of enforcement tools, including detention and external return arrangements.

These developments mark a decisive shift in European migration policy. However, they also raise **serious concerns widely expressed by civil society organisations, legal experts, local authorities, and European Migrant networks and others working directly with migration governance on the ground.** These concerns relate to:

- Uneven application of safeguards across Member States
- Insufficient operational preparedness in frontline systems
- Increasing complexity of procedures
- Risks of weakened access to rights and legal assistance
- And disproportionate impact on vulnerable groups, including children, families, and persons seeking protection

At the same time, the political and public debate surrounding these reforms has become increasingly polarised.

Following the European Parliament vote, some far-right Members of the European Parliament used slogans such as “**send them back**”, reflecting a worrying normalisation of dehumanising language in migration debates. In parallel, some Member States and political actors (ex. Spain and France) have voiced strong criticism of the direction of EU migration policy, including

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references to a “**Not our Europe**” approach, expressing concerns that current policies risk undermining dignity, family unity, and fundamental rights.

**These contrasting narratives reveal a deeper tension within Europe today:**

**A Europe increasingly shaped by fear, control, and exclusionary approaches, and a Europe grounded in solidarity, rights, and democratic participation.**

**ALDA Migration Hub stands clearly for the second.**

For more than **25 years**, ALDA has worked alongside local authorities, civil society organisations, and communities affected by displacement and migration across Europe and neighbouring regions - from the Western Balkans to Ukraine, and across Africa, South-West Asia, and Türkiye. Through this work, ALDA has consistently promoted **local democracy as the foundation of inclusion, resilience, and social cohesion.**

***This policy position paper reflects that experience and sets out ALDA Migration Hub’s members, experts, and partners’ approach to the implementation of the EU Pact on Asylum and Migration and the newly adopted EU Return Regulation !***

## Local Democracy: A Missing Pillar in EU Migration Governance

### Migration is managed locally, but governed centrally

In practice, migration is not managed in Brussels or national capitals alone. It is managed every day in:

- **municipalities** receiving new arrivals
- **regions** managing housing and reception capacity
- **schools** integrating children from diverse backgrounds
- **hospitals** ensuring access to healthcare
- **local services** supporting inclusion and social cohesion

**Local and regional authorities** are therefore **essential actors of migration governance**, not auxiliary implementers.

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Yet, despite this reality, they remain insufficiently embedded in EU and national decision-making structures.

## Structural mismatch between responsibility and recognition

The implementation of the Pact significantly increases pressure on local systems, particularly in:

- Reception and emergency accommodation
- Child protection systems
- Social and housing services
- Integration pathways and language support
- Community mediation and cohesion policies
- Education to diverse cultures

However, governance frameworks remain largely state-centred. This creates a structural imbalance:

Local authorities carry the operational burden, but are not fully recognised as governance partners. This gap is not only administrative. It is **institutional and democratic**.

## ALDA's position: from consultation to co-governance

ALDA Migration Hub calls for a shift from consultation-based approaches to **structured co-governance**, where local and regional authorities are:

- Involved in policy design from the beginning
- Included in implementation planning
- Engaged in monitoring and evaluation
- Recognised as co-responsible actors in outcomes

This is not an institutional preference, it is a requirement for effective governance.

Through its network of local authorities and civil society partners, ALDA has developed and supported:

- Participatory governance structures in migration and integration policies
- Local inclusion strategies for migrants and refugees
- Community-led reception and integration models
- Cross-border cooperation on displacement and mobility
- Long-term capacity-building for municipalities under migratory pressure

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This experience confirms a clear lesson:

Migration governance only becomes effective when local democracy is operational, resourced, and trusted.

## The EU Return Regulation: Efficiency Must Not Come at the Expense of Rights

### A more assertive EU return framework

The EU Return Regulation strengthens the EU return system through:

- more 'coordinated' return procedures among Member States
- expanded cooperation with third countries
- increased use of 'return arrangements' outside the EU
- enhanced 'enforcement mechanisms', including detention in certain cases

While these measures aim to improve system efficiency, they also introduce **significant implementation and rights-based concerns**.

Across Europe, including through the work of civil society organisations, legal experts, and local authorities, recurring concerns include:

- inconsistent application of procedural safeguards across Member States
- limited access to quality legal assistance and counselling
- insufficient preparedness of border and reception authorities
- risk of prolonged or disproportionate detention practices
- weak or delayed independent monitoring mechanisms
- increased operational pressure on local reception systems

These risks are not theoretical. They directly affect how the law is implemented in municipalities

### A clear ALDA benchmark

ALDA Migration Hub affirms that **No return policy can be considered effective if it compromises dignity, legal certainty, or fundamental rights.**

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All return procedures must fully respect:

- The **EU Charter of Fundamental Rights**
- The **principle of non-refoulement**
- **International refugee and human rights law**
- **Proportionality** and necessity
- **Non-discrimination and protection of vulnerable persons**

## The externalisation of EU borders

The Pact and the Return Regulation introduce legal developments that deserve careful scrutiny. Efficiency in migration management cannot come at the expense of the constitutional guarantees that underpin the national and European legal orders:

**Externalisation does not respect the European legal foundations:** Externalising border management to countries that do not share the EU's legal standards risks undermining respect for the basic rights enshrined by the EU.

**European borders are becoming a mobile legal space:** Border control is no longer confined to the geographical border but can take place across different locations within the EU, expanding the reach of exceptional migration procedures.

**Restrictions on personal liberty require stronger safeguards:** The regulations often avoid explicitly using the term “detention”. Instead, they use phrases such as “limitation of freedom of movement”, “prevention of the risk of absconding”, or “the need to keep the person available”. This is ambiguous language, which leaves Member States with broad discretion. The substance is clear: a differentiated regime is being constructed for foreign nationals, weakening a fundamental guarantee recognised for everyone, citizens and non-citizens alike.

**Data protection is a fundamental rights issue:** The data collected flows into increasingly interconnected databases. This raises significant concerns in terms of privacy and the possible exchange of information with countries of origin, which is extremely dangerous in the case of people seeking protection.

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## Local Realities: Where Policy Becomes Reality

### The implementation gap

The Pact significantly expands expectations on local authorities, but without equivalent strengthening of: governance participation, funding mechanisms, administrative capacity, coordination tools

This creates an implementation gap that is already visible in:

- overcrowded reception systems
- uneven integration capacity across regions
- pressure on housing and social services
- fragmentation of support systems

### Migration as a local governance reality

Migration is not an abstract policy field. It is a daily governance challenge that affects: school enrolment, housing availability, healthcare systems, labour market inclusion, social cohesion at neighbourhood level

This is where policies succeed, or fail.

For over 25 years, ALDA has worked with local actors in contexts of:

- conflict and post-conflict recovery
- displacement and refugee reception
- integration of migrants and minorities
- democratic transition and governance reform
- cross-border cooperation in fragile contexts

This experience demonstrates a consistent principle:

[Sustainable migration governance depends on empowered local communities and inclusive institutions.](#)

### The current European debate on migration is increasingly polarised.

On one side, exclusionary rhetoric - including slogans such as “**send them back**” - contributes to the normalisation of dehumanising language in political discourse.

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On the other side, criticism from several Member States and political actors, including references to a “**Not our Europe**” approach, reflects concerns that current EU migration policies risk undermining dignity, family unity, and fundamental rights.

These positions are not simply opposing blocs. They reflect a deeper structural tension in Europe between:

- approaches based on deterrence, fear, and exclusion
- approaches based on solidarity, rights, and shared responsibility

**ALDA does not accept migration being reduced to polarisation or slogans.**  
Instead, it calls for **evidence-based, rights-based, and locally grounded policymaking.**

## ALDA Migration Hub Call for Action

ALDA Migration Hub calls for a migration governance framework that is:

### 1. Democratically grounded

- Structured involvement of local and regional authorities
- Multi-level governance embedded in EU migration policy
- Recognition of local democracy as a core governance principle

### 2. Rights-based and human-centred

- Full compliance with fundamental rights in all procedures
- Strong safeguards in return and detention practices
- Protection of vulnerable groups as a non-negotiable priority

### 3. Practically effective

- Adequate and predictable funding for local implementation
- Coordination between EU, national, and local levels
- Capacity-building for frontline authorities

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## 4. Socially sustainable

- Long-term investment in integration and inclusion
- Support for community cohesion
- Prevention of social fragmentation and exclusion

## Conclusion

The implementation of the EU Pact on Migration and Asylum and the EU Return Regulation represents a defining moment for European migration governance.

The key question is not only how migration is managed, but **what kind of Europe is being shaped through these policies.**

**ALDA Migration Hub's position is clear:**

**A migration system that excludes local democracy risks weakening both its effectiveness and its legitimacy.**

Migration is lived locally, managed locally, and resolved locally.

A sustainable European migration policy must therefore start from where governance actually happens: in communities, cities, and regions.

ALDA Migration Hub



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