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To: Delegations

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Subject: Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for asylum, migration and integration for the period from 2028 to 2034

Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period 2028-2034

Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for internal security for the period from 2028 to 2034

- Opinion of the European Economic and Social Committee

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# OPINION

European Economic and Social Committee

## Home Affairs funds: Migration, Borders, Security

Home Affairs funds: Migration, Borders, Security

Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for asylum, migration and integration for the period from 2028 to 2034  
(COM(2025) 540 final)

Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period from 2028 to 2034  
(COM(2025) 541 final)

Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for internal security for the period from 2028 to 2034  
(COM(2025) 542 final)

**SOC/844**

Rapporteur: **José Antonio MORENO DÍAZ**

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**EN**

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Advisor	Gemma PINYOL (for the rapporteur, Group II)
Legislative procedure	<a href="#">EU Law Tracker</a>
Referral	European Commission, 17/7/2025
Legal basis	Article 79(2) of the Treaty on the Functioning of the European Union
European Commission documents	<a href="#">COM(2025) 540 final</a> <a href="#">COM(2025) 541 final</a> <a href="#">COM(2025) 542 final</a>
Relevant Sustainable Development Goals (SDGs)	<a href="#">Summary</a> of COM(...) ... <a href="#">SDG X – ...</a>
Section responsible	Employment, Social Affairs and Citizenship
Adopted in section	27/1/2026
Adopted at plenary session	19/2/2026
Plenary session No	603
Outcome of vote (for/against/abstentions)	180/15/26

## 1. RECOMMENDATIONS

- 1.1 The EESC notes with interest the three proposals for regulations on financial support – covering admission, migration and integration; the Schengen area, borders and visas; and internal security – which establish the EU support framework for the period from 2028 to 2034. At the same time, the Committee stresses the urgent need to establish an immigration policy that provides legal, safe and effective channels for access to the EU. This stance aligns with its previous opinions, in which the EESC underlined the importance of ensuring legal pathways into the EU, protecting the fundamental rights of migrants and improving the management of mobility within the EU.
- 1.2 The EESC notes that the three regulations taken together reveal a structural reorientation of the EU's priorities, with a marked shift towards control and security. While recognising that effective border management is essential for a well-functioning Schengen area, the strong focus on security, both internal and external, tends to overlook support measures on integration and inclusion. The EESC emphasises that migration policy cannot be reduced to a security-driven approach, and warns that the current emphasis of the funding regulations risks overshadowing the equally essential role of integration and inclusion measures, which are fundamental to social cohesion, economic participation and the effective management of migration in the EU.
- 1.3 The EESC underlines that a full set of tools and instruments to manage regular migration and avoid irregularity are important elements of a well-functioning migration system, including return when applicable and in full compliance with EU and international law. Nevertheless, their implementation must be carefully balanced, with respect for fundamental rights, in particular the right to individual protection.
- 1.4 The EESC notes that the emphasis is placed on coherence and complementarity between internal funds and EU external policies, especially the Global Europe instrument. The EESC points out that this integration of instruments must not blur the boundaries between humanitarian, border-control and security objectives, which could shift the EU's approach away from rights-based protection and inclusion towards security measures and outsourcing.
- 1.5 The EESC considers it essential to improve the mechanisms for independent monitoring of fundamental rights and humanitarian conditions at borders, with transparent reporting mechanisms. It underlines that such mechanisms should be established in each Member State, while also ensuring that the Commission can access and use them.
- 1.6 With regard to Regulation COM(2025) 540, the EESC notes (i) the lack of clarity regarding mechanisms for compliance with the Charter of Fundamental Rights in return and readmission operations, (ii) the absence of binding commitments for legal migration and integration and (iii) the limited involvement of local and regional authorities and civil society bodies. In that sense, the EESC considers that exploring ways to foster information exchange and the sharing of best practices could be useful for improving cooperation and ensuring more effective, rights-based migration management, including at regional and local level.
- 1.7 With regard to Regulation COM(2025) 541, the EESC warns against expanding technological surveillance tools without strong safeguards for data protection, with the risk of reinforcing a

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‘fortress Europe’ approach with little consideration for humanitarian consequences. The EESC points to an inherent risk to the right to asylum, as speed and security are prioritised over due process and case-by-case assessment.

- 1.8 With regard to Regulation COM(2025) 542, the EESC stresses (i) that internal security should not be pursued at the expense of civic freedoms and social cohesion; (ii) that care should be taken when linking migration management and criminal justice; and (iii) that cooperation with third countries must strictly comply with human rights and international law.
- 1.9 The EESC believes that the three regulations adopted together for 2028-2034 place strong emphasis on security measures and the outsourcing of border control and raise concerns about potential risks to fundamental rights. It is essential to ensure that fundamental human rights are protected at the same time.
- 1.10 The EESC considers that support for free movement and the Schengen area, one of the EU’s greatest achievements, is essential for a coherent and credible EU approach to migration, border management and security policies. Furthermore, the EESC stresses that Europe’s legitimacy in migration, border and security policies depends on its ability to defend democratic values and fundamental rights. In this regard, financial instruments should protect people as well as borders, ensuring that dignity, fairness and solidarity are at the heart of EU action.

## 2. EXPLANATORY NOTES

### Background

- 2.1 The three proposals – COM(2025) 540, 541 and 542 – are part of the post-2027 financial framework and establish EU financial support for asylum, migration and integration; the Schengen area, integrated border management and the visa policy; and internal security. Together, they update and replace the current Asylum, Migration and Integration Fund (AMIF), the Integrated Border Management Fund and the Internal Security Fund and implement the 2024 Pact on Migration and Asylum, the Schengen governance reforms and the ProtectEU internal security strategy, establishing EU funding priorities for the period 2028-2034.
- 2.2 The **regulation establishing support for asylum, migration and integration** supports the implementation of the Pact on Migration and Asylum, by ensuring that all Member States have ‘well-prepared’ systems for asylum, reception, return and early integration of third-country nationals. It promotes national integrated case management systems bringing together asylum, reception and return in more efficient systems. It highlights the need for significant medium- and long-term investment in digitalisation and AI-based technologies to simplify the management system and increase its efficiency and also to achieve faster, simpler and more effective return procedures. Lastly, it funds key personnel for the operation of the system, such as case workers, legal advisers and monitors for fundamental rights, and provides support for specific activities in third countries, strengthening the external dimension of migration management. The proposal allocates around EUR 11.975 billion for the period from 2028 to 2034, focusing on solidarity, fair responsibility-sharing and funding for resettlement, humanitarian admission and relocation established by Regulation (EU) 2024/1351.

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- 2.3 The **regulation establishing support for the Schengen area and visas** aims to ensure a fully functioning Schengen area through safer external borders, placing European integrated border management and visa policy at its core, as well as providing support for the Screening Regulation as part of what it defines as efficient border management. It prioritises the urgent need to protect borders against hybrid threats and the weaponisation of migration, and measures preventing irregular movements and combating migrant smuggling and human trafficking. Moreover, the regulation stresses the need for large-scale interoperable IT systems (the Schengen Information System (SIS), the Visa Information System (VIS), Eurodac, the Entry/Exit System (EES) and the European Travel Information and Authorisation System (ETIAS)) and the need to increase financial support for and strengthen agencies such as Frontex and eu-LISA. The instrument earmarks around EUR 15.4 billion for 2028-2034.
- 2.4 The **regulation establishing support for internal security** seeks to achieve a safer and more secure Europe, in line with the ProtectEU Strategy (adopted on 1 April 2025). It addresses cross-border threats such as organised crime networks, terrorist threats, extremism and radicalisation, cyberattacks and foreign manipulation of information. In addition, it prioritises enhanced coordination between law enforcement and judicial authorities and integrates security considerations across EU policies, including external action. With a budget of around EUR 6.8 billion for the period from 2028 to 2034, the proposal makes the ProtectEU Strategy operational and fosters cooperation between Member States, EU agencies (Europol, CEPOL, EUDA) and relevant civil society or private actors.
- 2.5 Each regulation operates under the horizontal rules laid down for the future European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security, the umbrella mechanism for EU shared management programmes.

#### **Comments on the proposed regulations**

- 2.6 The EESC emphasises that migration policy cannot be reduced to a security-driven approach, and warns that the current emphasis of the funding regulations risks overshadowing the equally essential role of integration and inclusion measures, which are fundamental to social cohesion, economic participation and the effective management of migration in the EU.
- 2.7 While acknowledging that effective border control is essential to safeguarding the integrity and smooth running of the Schengen area, the EESC stresses that adequate resources must also be allocated to integration policies, including labour market access, language learning and social inclusion measures, to ensure sustainable and cohesive migration management.
- 2.8 The EESC stresses the urgent need to establish an immigration policy that provides legal, safe, effective channels for access to the EU. This position is in line with its previous opinions<sup>1</sup>, in which the Committee underlined the importance of ensuring legal pathways to enter the EU, protecting the fundamental rights of migrants and improving the management of mobility within the EU.

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<sup>1</sup> See, for example <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/new-pact-migration-and-asylum>.

- 2.9 The EESC notes with interest the three proposals for regulations on financial support (admission, migration and integration; Schengen area, borders and visas; and internal security), which establish the EU support framework for the period from 2028 to 2034, and notes that this framework makes the crisis response of the Pact on Migration and Asylum and the ProtectEU Strategy a permanent and long-term structure which will operate until 2034.
- 2.10 The EESC notes that the three regulations taken together reveal a structural reorientation of the EU's priorities, with a marked shift towards control and security. The EESC notes the consolidation of a security-based approach bringing migration, borders and internal security together under the umbrella of the ProtectEU security strategy.
- 2.11 The EESC notes that the emphasis on security, both internal and external, tends to overlook support measures aimed at facilitating the integration of migrants in host countries, including language learning, access to the labour market, in particular through vocational training, and other measures promoting social and economic inclusion.
- 2.12 With regard to the AMIF regulation, the EESC underlines that, while a full set of tools and instruments to manage regular migration and avoid irregularity are important elements of a well-functioning migration system (including return when applicable), their implementation must be carefully balanced, as these measures must never come at the expense of fundamental rights, in particular the right to individual protection.
- 2.13 The EESC draws attention to the fact that decentralised agencies (Frontex, eu-LISA, Europol) are given a much greater operational role and a massive increase in funding. It is concerned to note that investment in large-scale IT systems and the implementation of the Screening Regulation are increasingly turning borders into areas of technological control and rapid processing. The EESC points to an inherent risk to the right to asylum, as speed and security are prioritised over due process and case-by-case assessment.
- 2.14 The EESC acknowledges that funding for key personnel is mentioned, such as 'monitors for fundamental rights'. However, it warns that the overall approach of the funds is driven by digitalisation (AI) and efficiency in asylum and return procedures, which makes it difficult to provide individualised attention to each case. In that sense, the EESC warns that seeking efficiency and reducing costs through technology must not take precedence over assessing individual protection needs.
- 2.15 The EESC is concerned about the emphasis placed on coherence and complementarity between internal funds and EU external policies, especially the Global Europe instrument, which basically advances the financial institutionalisation of outsourcing, i.e. delegation of control and security to third countries, making it a permanent, structural pillar of EU migration and security governance.
- 2.16 The EESC believes that these proposals reflect a growing trend towards addressing migration, border management and internal security as interconnected policy areas. This three-pillar framework aims to ensure operational coherence and financial flexibility, simplifying procedures

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for Member States and strengthening the role of EU agencies (Frontex, Europol, eu-LISA, Cefpol, etc.).

- 2.17 The EESC points out that this integration of instruments also risks blurring the boundaries between humanitarian, border control and security objectives. The Committee therefore stresses the importance of ensuring that the EU's approach remains firmly rooted in rights-based protection and inclusion and that security measures and cooperation with third countries are accompanied by appropriate safeguards, transparency and accountability.
- 2.18 With regard to Regulation COM(2025) 540, the EESC notes (i) the lack of clarity regarding mechanisms for compliance with the Charter of Fundamental Rights in return and readmission operations and (ii) the absence of binding commitments for legal migration and integration.
- 2.19 The EESC also notes (iii) the limited involvement of local and regional authorities and civil society organisations. In that sense, the EESC emphasises the essential role played by local and regional authorities and civil society organisations in welcoming refugees and supporting the integration of migrants. In many Member States, these actors are at the forefront of implementation and provide indispensable practical expertise and services. The EESC therefore calls for their greater and more systematic involvement in designing and implementing EU-funded measures, including through structured dialogue, enhanced information exchange and the dissemination of best practices, in order to strengthen cooperation and ensure more effective, rights-based migration management at local and regional level.
- 2.20 With regard to Regulation COM(2025) 541, the EESC warns against expanding technological surveillance tools without strong safeguards for data protection, with the risk of reinforcing a 'fortress Europe' approach with little consideration for humanitarian consequences. Investment in large-scale IT systems and in the implementation of the Screening Regulation is increasingly turning borders into areas of rapid processing and technological control. This poses an inherent risk to the right to asylum as it prioritises speed and security over due process.
- 2.21 The EESC considers it essential to improve the mechanisms for independent monitoring of fundamental rights and humanitarian conditions at borders, with transparent reporting mechanisms. It underlines that such mechanisms should be established in each Member State, while also ensuring that the Commission can access and use them.
- 2.22 With regard to Regulation COM(2025) 542, the EESC stresses (i) that internal security should not be pursued at the expense of civic freedoms and social cohesion, (ii) that care should be taken when linking migration management and criminal justice and (iii) that cooperation with third countries must strictly comply with human rights and international law.
- 2.23 As regards funding for 'monitors for fundamental rights' and the commitment to digitalisation and the use of artificial intelligence in asylum and return procedures, the EESC believes there is a danger that seeking efficiency and reducing costs through technology and fast-track procedures will take precedence over assessment of individual protection needs.

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- 2.24 The EESC believes that the three financial regulations taken together reveal a thorough structural reorientation of the EU's priorities for the period from 2028 to 2034, characterised by security measures, outsourcing and the risk of fundamental rights being undermined.
- 2.25 The EESC considers that support for free movement and the Schengen area, one of the EU's greatest achievements, is essential for a coherent and credible EU approach to migration, border management and security policies.
- 2.26 The EESC stresses that Europe's legitimacy in migration, border and security policies depends on its ability to defend democratic values and fundamental rights. In this regard, financial instruments should protect people as well as borders, ensuring that dignity, fairness and solidarity are at the heart of EU action.

Brussels, 19 February 2026.

*The President of the European Economic and Social Committee*  
Séamus BOLAND

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