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Family reunification of third-country nationals: State of play of law and practice

European Migration
Network Study

October 2025

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The study does not necessarily reflect the opinions and views of the European Commission, the EMN Service Provider, the EMN NCPs, IOM, UNHCR, Red Cross EU Office and its members, nor are they bound by its conclusions. Similarly, the European Commission, the EMN Service Provider and the EMN NCPs are in no way responsible for any use made of the information provided.

EXPLANATORY NOTE

This study was prepared on the basis of national contributions from 25 EMN NCPs (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS) collected via a Common Template developed by the EMN NCPs to ensure, to the extent possible, comparability. The information contained in this study refers to the situation in the abovementioned EMN Member and Observer Countries up to February 2025.

National contributions were largely based on desk analysis of existing legislation and policy documents, reports, academic literature, internet resources, reports and information from national authorities rather than primary research. Statistics were sourced from Eurostat, national authorities and other (national) databases.

Note: The Red Cross EU Office is the membership office representing the 27 National Red Cross Societies in the EU, the Norwegian Red Cross, the Icelandic Red Cross and the International Federation of Red Cross and Red Crescent Societies (IFRC) to the EU. The responses to this questionnaire have been prepared on the basis of contributions from Red Cross societies in a number of EMN Member and Observer countries and compiled by the Red Cross EU Office. Their inputs mainly address the family reunification process for beneficiaries of international protection (BIP).

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FOR MORE INFORMATION

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LIST OF DEFINITIONS

The study uses the following definitions, which are based on the European Migration Network (EMN) Asylum and Migration Glossary (EMN Glossary), unless otherwise stated.¹

Please note that when reference is made to beneficiaries of international protection (BIP) throughout the study, it means that the rules described apply to both refugees and beneficiaries of subsidiary protection. In case of differentiation, the study will explicitly refer only to refugees or beneficiaries of subsidiary protection.

| Term | Definition |
|--|---|
| Adult | Every human being aged 18 years and older (unless majority is attained later under the law applicable to the adult). |
| Beneficiary of international protection (BIP) | A person who has been granted refugee status or subsidiary protection status. |
| Child | Every human being below the age of 18 years, unless under the law applicable to the child, majority is attained earlier or later. |
| Complementary pathways | Migration pathways with refugee-specific flexibilities built in that allow refugees to access work, study and other opportunities outside their countries of origin or first asylum, while their international protection needs are respected. Complementary pathways can also take the shape of programmes created specifically for refugees to access opportunities internationally outside of United Nations High Commissioner for Refugees (UNHCR)-assisted resettlement. ² |
| European Union (EU) Blue Card holder | A third-country national who has acquired a residence permit bearing the term 'EU Blue Card' that entitles them to reside and work in the territory of an EU Member State for the purpose of highly qualified employment. |
| Family member | <p>In the general migration context, a person who is either married to a migrant, or has a relationship legally recognised as equivalent to marriage with a migrant, as well as their dependent children or other dependants who are recognised as members of the family by applicable legislation.</p> <p>In the context of the Family Reunification Directive, a third-country national (normally members of the nuclear family, i.e. the spouse and the minor children), who has entered the territory of the EU for the purpose of family reunification.</p> <p>NB: A family member may also be another family member whose relationship is attested by documentary evidence or other means, according to national law.</p> |
| Family reunification | In the <u>context of the Family Reunification Directive</u> , the entry into and residence in an EU Member State by family members of a third-country national residing lawfully in that EU Member State in order to preserve the family unit, whether the family relationship arose before or after the resident's entry. |
| Guardian | An independent person appointed to act on behalf of a child , in the absence of (both) parents or the adult responsible for the child by law or by practice, who safeguards the best interests of the child and general well-being, and to this effect complements the limited legal capacity of the child, when necessary, in the same way that parents do. |
| Highly qualified migrant | <p>In the global context, a person falling within International Labour Organization (ILO) International Standard Classification of Occupations (ISCO)-88 Classes 1, 2 and 3, e.g. a person qualified as a manager, executive, professional, technician or similar, who moves within the internal labour markets of transnational corporations and international organisations, or who seeks employment through international labour markets for scarce skills.</p> <p>In the EU context, a third-country national who seeks employment in a Member State and has the required adequate and specific competence, as proven by higher professional qualifications.</p> |
| Integration | In the EU context, a dynamic, two-way process of mutual accommodation by all immigrants and residents of EU Member States. |
| Intra-corporate transferee | A third-country national subject to a temporary secondment from an undertaking established outside the territory of a Member State and to which the third-country national is bound by a work contract to an entity belonging to the undertaking or to the same group of undertakings which is established inside this territory. |

¹ European Migration Network (EMN), EMN Glossary, n.d., https://ec.europa.eu/home-affairs/what-we-do/networks/european_migration_network/glossary_en, accessed 27 February 2025.

² UNHCR, 'Complementary pathways for admission to third countries', n.d., <https://www.unhcr.org/what-we-do/build-better-futures/long-term-solutions/complementary-pathways>, accessed 3 October 2024.

| Term | Definition |
|-------------------------------|--|
| Long-term resident | A third-country national who has long-term resident status as provided for under Articles 4 to 7 of Council Directive 2003/109/EC or as provided for under national legislation. |
| Minor | In a legal context and in contrast to a child, a person who, according to the law of their respective country, is under the age of majority, i.e. is not yet entitled to exercise specific civil and political rights. |
| Nuclear family | The spouse and the minor children of a family. |
| Refugee | <p>In the global context, either a person who, owing to a well-founded fear of persecution for reasons of race, religion, nationality, political opinion or membership of a particular social group, is outside the country of nationality and is unable or, owing to such fear, is unwilling to avail themselves of the protection of that country, or a stateless person, who, being outside of the country of former habitual residence for the same reasons as mentioned before, is unable or, owing to such fear, unwilling to return to it.</p> <p>In the EU context, either a third-country national who, owing to a well-founded fear of persecution for reasons of race, religion, nationality, political opinion or membership of a particular social group, is outside the country of nationality and is unable or, owing to such fear, is unwilling to avail themselves of the protection of that country, or a stateless person, who, being outside of the country of former habitual residence for the same reasons as mentioned above, is unable or, owing to such fear, unwilling to return to it, and to whom Article 12 (exclusion) of Directive 2011/95/EU (Recast Qualification Directive) does not apply.</p> |
| Researcher | In the EU migration context, a third-country national holding a doctoral degree or an appropriate higher education qualification, which gives that third-country national access to doctoral programmes and who is selected by a research organisation and admitted to the territory of an EU Member State for carrying out a research activity for which such qualification is normally required. |
| Right to family life | A right enshrined in Articles 7, 9 and 33 of the Charter of Fundamental Rights of the European Union and Article 8 of the European Convention on Human Rights (ECHR). |
| Right to family unity | In the context of a refugee, a right provisioned in Article 23 of Directive 2011/95/EU and in Article 12 of Directive 2013/33/EU obliging EU Member States to ensure that family unity can be maintained. |
| Seasonal worker | A third-country national who retains their principal place of residence in a third country and stays legally and temporarily in the territory of an EU Member State to carry out an activity dependent on the passing of the seasons, under one or more fixed-term work contracts concluded directly between that third-country national and the employer established in that EU Member State. |
| Sponsor | <p>In the global context, a person or entity which undertakes a (legal, financial or personal) engagement, promise or pledge, on behalf of another.</p> <p>In the EU context of family reunification, a third-country national residing lawfully in a Member State and applying, or whose family members apply, for family reunification to be joined with them.</p> |
| Student | In the EU migration context, a third-country national accepted by an establishment of higher education and admitted to the territory of an EU Member State to pursue as their main activity a full-time course of study leading to a higher education qualification recognised by the Member State, including diplomas, certificates or doctoral degrees, which may cover a preparatory course prior to such education, in accordance with national law, or compulsory training. |
| Subsidiary protection | The protection given to a third-country national or a stateless person who does not qualify as a refugee but in respect of whom substantial grounds have been shown for believing that the person concerned, if returned to their country of origin, or in the case of a stateless person to their country of former habitual residence, would face a real risk of suffering serious harm and to whom exclusion grounds do not apply, and is unable or, owing to such risk, unwilling to avail themselves of the protection of that country. |
| Third-country national | Any person who is not a citizen of the EU within the meaning of Article 20(1) of the Treaty on the Functioning of the European Union (TFEU) and who is not a person enjoying the Union right to free movement, as defined in Article 2(5) of the Schengen Borders Code. |

EXECUTIVE SUMMARY



KEY POINTS TO NOTE

- Family reunification policies have evolved significantly since 2017 when the last study on family reunification was published by the European Migration Network (EMN), with many Member and Observer Countries aligning their national laws with European Union (EU) case law, introducing digitalised procedures, and embedding family reunification in broader migration and labour strategies.³
- EMN Member and Observer Countries have increasingly differentiated their approaches, facilitating family reunification for attracting certain categories such as skilled workers, while introducing stricter requirements for other groups, such as age thresholds, waiting periods, and proof of income.
- Eligibility rules for sponsors and family members vary, with most countries permitting third-country nationals with valid permits to act as sponsors. Definitions of eligible family members range from nuclear to extended family, depending on factors such as dependency and humanitarian grounds.
- Material and integration requirements remain key conditions for family reunification, although many countries apply exemptions or case-by-case flexibility for vulnerable groups such as beneficiaries of international protection (BIP), unaccompanied minors, and older adult dependents.
- Application procedures differ between Member States, including who can submit the application and how (via consulates, in-person, or online). Required documents, when unavailable, may be substituted with alternative evidence such as interviews or DNA testing, witness statements and history records of the family.
- Delays, high costs and administrative burdens persist, especially for applicants from conflict-affected regions. Good practices include digitalisation, priority processing for minors, and inter-agency coordination emerging as effective solutions.
- Post-reunification access to rights such as education, employment, and healthcare is generally granted, often supplemented by tailored support like language training, diploma recognition, and vocational services, particularly for BIP.
- Early access to long-term or autonomous residence varies, and delays risk dependency on the sponsor. Some countries provide conditions for earlier access in cases of domestic violence or widowhood and are exploring broader equal rights frameworks to enhance integration.



BACKGROUND

Family reunification has long been one of the main channels of legal migration to the EU, accounting for 26% of all first residence permits issued in 2023, or nearly one million permits, according to Eurostat. It plays a crucial role in upholding the right to family life under international and EU law, supporting the integration of third-country nationals, and contributing to labour market needs when family members enter employment.

The EU's legal framework for family reunification of third-country nationals is anchored in Council Directive

2003/86/EC (Family Reunification Directive), which sets out the conditions and rights associated with family reunification for legally residing third-country nationals. Since its adoption in 2003, several significant developments have shaped its implementation, including amendments to national legislation, key rulings by the Court of Justice of the European Union (CJEU) and the European Court of Human Rights (ECtHR), and the growing digitalisation of migration procedures across Member States.

³ Note for the reader: The key points/executive summary section provides a summary of the main information contained in the inform or study. For ease of reading, key points do not contain footnotes. Please note that EMN Member and Observer Countries referred to in the key points or executive summary are listed in the relevant sections within the current document.



SCOPE, AIMS AND RATIONALE OF THE STUDY

This study provides an overview of legal and policy developments related to the implementation of the Family Reunification Directive since 2017, as an update to an earlier EMN study on family reunification published that year. It examines the current state of national legislation, policies, and practices after two decades of the Directive's application, incorporating relevant case law and highlighting challenges and good practices. For countries not applying the Directive, such as Ireland and Serbia, the study offers a comparative perspective on similar national frameworks governing family reunification.

Aimed primarily at national policymakers, the study supports the development of effective family reunification policies and promotes the exchange of good practices across EMN countries. It maps recent legislative and policy

changes, including those prompted by rulings of the CJEU, and explores complementary pathways. It also presents data on the scale and evolution of family reunification between 2017 and 2023 (and 2024 where available), drawing on both Eurostat and national sources. The findings are also relevant to practitioners, non-governmental organisations (NGOs), international organisations, and the general public engaged in this area.

As specified above, when reference is made to beneficiaries of international protection (BIP) throughout the study, it means that the rules described apply to both refugees and beneficiaries of subsidiary protection. In case of differentiation, the study will explicitly refer only to refugees or beneficiaries of subsidiary protection.



OVERVIEW OF CURRENT SITUATION IN RESPECT OF FAMILY REUNIFICATION

According to Eurostat data, the number of first-time residence permits granted for family reunification to family members joining a non-EU citizen in the 27 EU Member States fluctuated from 531 000 in 2018 to 632 000 in 2023. In 2023, the number of first permits issued for family reasons to non-EU citizens varied from 1 152 issued in Estonia to 168 536 permits issued in Germany. The number of permits issued per 1 000 people on the EU-level was 1.4 permits, ranging between 0.1 in Romania, and 6.8 permits issued in Cyprus.

Numerous changes have been introduced by EMN Member and Observer Countries since 2017, including legislative reforms aligned with EU case law, enhanced digitalisation, and tailored approaches to support skilled migration and integration. As such, family reunification is increasingly integrated into broader migration and labour policies.

Several Member States have facilitated faster or more flexible reunification pathways for skilled workers and their families, in line also with legal changes at EU level in the EU Blue card Directive,⁴ while others⁵ have introduced stricter requirements for other categories, including minimum age, waiting periods, and proof of sufficient resources. Targeted support for specific groups and BIP is also expanding in some countries.⁶ While France, Germany and Italy have implemented family assistance programmes, four countries⁷ provided information on support for family reunification through existing services. For those not meeting standard requirements, alternative legal avenues may be available, such as humanitarian grounds⁸ or protection of family life under Article 8 of the ECHR,⁹ offering tailored solutions based on individual circumstances.



DEFINITIONS OF SPONSOR AND FAMILY MEMBERS

All EMN Member and Observer Countries allow third-country nationals with valid residence permits and refugees to act as sponsors, with some also permitting unaccompanied minors or highly skilled workers to sponsor family members. Beneficiaries of subsidiary protection are also generally eligible,¹⁰ although often subject to stricter requirements than refugees.

The definition of eligible family members varies across EMN countries. All countries allow reunification with

spouses and minor children under 18, although rules on determining minority status differ. Many countries also permit reunification with adult children,¹¹ parents,¹² non-married¹³ and same-sex partners,¹⁴ and other dependent or extended family members¹⁵ under specific circumstances, such as health-related dependency or humanitarian grounds. Some countries recognise long-term or registered partnerships, while others limit eligibility to nuclear family members only.

4 AT, DE, FI, HU, IE, LT, LU, NL, SK.

5 DE, EE, FI, FR, IT, SE.

6 DE, ES, IE, LT, LV, SI.

7 AT, FI, LT, LV.

8 BE, DE, ES, HR, IT, LV, and RS.

9 BE, CY, DE, FR, LU, NL, SE, SK.

10 AT, BE, BG, DE, EE, ES, FI, FR, HR, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

11 AT (under very specific circumstances), BE, BG, CZ, EE, EL, ES, FI, HR, HU (only for persons eligible for freedom of movement), IE, IT, LU, LV (only in cases when the adult children are legally incapacitated), NL, SI, SK and RS.

12 AT (under specific circumstances), BG, CZ, DE (under very specific circumstances), EE, EL, ES, FI, IE, IT, LT, LU, PL, SE, SI, SK and RS.

13 AT, BE, BG, EE, EL, ES, FI, FR (family reunification of BIP), HR, IE, LT, LU, NL, SE, SI and RS.

14 AT, BE, CY, CZ, DE, EE, EL (in certain cases), ES, FI, FR, HR, HU, IE, IT (registered partnership), LT, LU, NL, SE, SI.

15 AT (under certain circumstances), BE, EE, EL, FI, HR, HU, LV, NL, SE, SI, SK and RS.



REQUIREMENTS AND CONDITIONS FOR EXERCISING THE RIGHT TO FAMILY REUNIFICATION

As per the Family Reunification Directive, EU Member States may require proof of suitable accommodation,¹⁶ sickness insurance,¹⁷ and stable and regular financial resources.¹⁸ While many countries impose minimum space,¹⁹ hygiene,²⁰ and suitability standards for accommodation,²¹ several offer exemptions, particularly for refugees²² and unaccompanied minors.²³ Exemptions and case-by-case flexibility exist for specific categories, such as refugees,²⁴ unaccompanied minors,²⁵ highly skilled workers,²⁶ and older adult dependents.²⁷ The study also notes varying approaches to calculating income thresholds and reference periods across EMN Member Countries.

In addition to material conditions, some EMN Member Countries²⁸ impose integration requirements, including pre- and post-arrival civic or language obligations. Some EMN Member Countries also apply waiting periods before family reunification is permitted. These waiting periods vary from one to three years, although some countries waive it for refugees.²⁹ The study also highlights the importance of taking into account the best interests of the child and family circumstances when assessing

applications for family reunification. More favourable provisions apply to refugees, including a grace period of (minimum) three months before the integration requirements for exercising the right to family reunification can be requested.³⁰

EU Blue Card holders,³¹ researchers,³² and intra-corporate transferees³³ also enjoy a more favourable family reunification regime, including shorter processing times³⁴ and exemptions from integration measures.³⁵

Despite these provisions, several challenges persist.³⁶ High housing costs,³⁷ strict income thresholds,³⁸ and burdensome documentation requirements³⁹ can hinder the family reunification efforts. Integration requirements, particularly language proficiency, also pose barriers, especially for vulnerable applicants.⁴⁰ Good practices⁴¹ include flexible case-by-case decision-making, prioritisation of applications from vulnerable groups, and support services for newly arrived family members. In Luxembourg, for example, there is a dedicated service for newly arrived pupils and parents “the School Integration and Welcoming Service”.



APPLICATION PROCESS FOR FAMILY REUNIFICATION

The study uncovers similarities and differences in how EMN Member and Observer Countries manage the submission and examination of family reunification applications. EMN Member and Observer Countries provide information on application for family reunification, primarily through migration authority websites,⁴² but also via telephone,⁴³ email,⁴⁴ booklets⁴⁵ or in-person at advice centres⁴⁶ with many also offering such advice via diplomatic

and consular missions,⁴⁷ municipalities,⁴⁸ NGOs,⁴⁹ and international organisations such as IOM⁵⁰ and the United Nations High Commissioner for Refugees (UNCHR).⁵¹ In some cases, multilingual content⁵² and tailored materials are provided, especially for refugees.⁵³

Procedures for lodging applications vary between countries, where applications may be submitted either by the

16 AT, BE, BG, CZ, CY, DE, EL, ES, FR, HR, HU, IT, LT, LU, LV (proof of intended residence), MT, SE, SK.

17 AT, BE, BG, CY, CZ, DE, EE, ES, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SI, SK and RS.

18 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK and RS.

19 AT, BE (certain regions), CZ, DE, FR, HU, IT, LT, LU, SI, SK.

20 AT, BE, CZ, ES, FR, IT, LT, LU, SK.

21 AT, BE, CZ, ES, FR, HU, IT, LT, LU, SK.

22 AT (under certain circumstances), BE, CY, DE, EL, ES, FR, HR, IE, IT, LT, LU, LV, SI, SK.

23 AT (under certain circumstances), BE, CY, DE, EL, ES, FR, LT, LV, SI, SK.

24 AT (under certain circumstances), BE, CY, DE, EE, EL, ES, FR, HR, IE, IT, LT, LU, LV, NL, SI, SK.

25 AT (under certain circumstances), BE, DE, EE, LU, LV, SI.

26 BE, DE, NL.

27 BE, SI.

28 AT, CZ, DE, ES, FR, IT, NL.

29 EL, IE (no waiting period for BIP provided they apply within 12 months of receiving their decision), IT (for both refugees and beneficiaries of subsidiary protection), LU, LV, NL and RS.

30 AT, BE, CZ, CY, EE, EL, FI, FR, HR, LT, NL, SE, SI, SK.

31 AT, BE, CZ, DE, EE, EL, ES, FI, FR, HR, IT, LT, LU, LV, MT, NL, PL, SI, SK.

32 AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, HR, IT, LT, LU, MT, NL, PL, SI, SK.

33 BE, CY, CZ, DE, EE, EL, ES, FI, FR, HR, IT, LT, LU, MT, NL, PL, SI, SK.

34 BE, CZ, DE, EL, ES, FI, FR, LT, LU, LV, NL, SI, SK.

35 AT, BE, DE, EE, ES, FR, NL.

36 AT, BE, BG, DE, EL, FR, HR, IE, IT, LT, NL, PL, SK and RS.

37 AT, BE, DE, LU.

38 AT, BE, DE, FI, IE, LU, SK.

39 DE, EL, FI, FR, HR, IE, IT, LU, LV, MT, SE, SK.

40 AT, IT, NL.

41 IE, IT, LU.

42 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, SE, SI, SK, and RS.

43 AT, CZ, DE, EE, FI, LT, LV, PL, SE, SK.

44 CZ, DE, EE, FI, LT, LV, SE, SK.

45 DE, EE, EL, FR, SK.

46 AT, DE, EE, FI, LT, LV, MT, SK.

47 BE, DE, FI, IT.

48 AT, BE, DE, EE, ES, FI, IT, SK.

49 AT, DE, EE, ES, FI, IE, IT, LT, LV, SK.

50 DE, EE, IE, LT, SK.

51 BE, EE, ES, IE, LT, LV.

52 BE, CZ, EE, EL, FR, FI, LT, LU, SK.

53 EE, EL, FR.

sponsor⁵⁴ and/or the family member,⁵⁵ depending on national rules and the applicant's status. Submission methods for the sponsor include in-person,⁵⁶ postal,⁵⁷ or online channels.⁵⁸ In countries where the family member submits the application, this is typically done at the diplomatic mission or consular post in the country where the person resides or in another country where there is diplomatic representation.⁵⁹

To support the application, a range of documentation of identity and family relationships is required, including, most commonly, a valid travel document,⁶⁰ a marriage certificate⁶¹ and a birth certificate.⁶² Where such documents are unavailable, alternative evidence such as interviews,⁶³ witness statements,⁶⁴ or DNA testing⁶⁵ may be accepted. Administrative fees apply in most countries,⁶⁶ although certain categories of persons are exempt⁶⁷ from fees or are subject to lower fees.⁶⁸ Across countries, the processing times varies significantly between the legal time limits and the actual duration in practice. Many countries have legal deadlines for decision-making depending

on the type of application, ranging from 10 days in Latvia for family members of EU Blue Card holders to the maximum limit prescribed in the Family Reunification Directive of nine months in some countries.⁶⁹

Practical implementation varies widely, with several EMN Member and Observer Countries highlighting challenges such as long processing times,⁷⁰ difficulties in accessing consular services,⁷¹ and high costs for applicants,⁷² particularly for refugees from conflict zones. National authorities face administrative burdens due to fragmented responsibilities, document verification issues, and growing caseloads.⁷³ Good practices include digitalisation of applications (e.g. France, Germany, Italy, Lithuania), improved inter-agency coordination (e.g. Finland, Lithuania), targeted support for vulnerable groups (e.g. Ireland's travel assistance programme), and standardised national procedures. Slovenia reported effective efforts to improve access to information and introduce priority channels for unaccompanied minors and applicants with special needs.



ACCESS TO RIGHTS FOLLOWING FAMILY REUNIFICATION

In line with Article 14 of the Family Reunification Directive, family members generally have access to education, employment, and vocational training under the same conditions as the sponsor. Tailored support measures such as language training,⁷⁴ civic integration programmes,⁷⁵ and diploma recognition⁷⁶ are often available, particularly for refugees and beneficiaries of subsidiary protection and their families.⁷⁷ Access to healthcare and social benefits is also broadly provided, although the scope and conditions vary depending on national systems and the sponsor's residence status. Autonomous residence permits must be granted no later than five years after arrival, with some countries allowing earlier access,⁷⁸ particularly in cases of widowhood, separation, or domestic violence. Family members may also apply for long-term residence or naturalisation after a specified period,

ranging from 3 to 5 years for long-term residence⁷⁹ and 5 to 10 years for citizenship through naturalisation.⁸⁰ Recent legislative changes have extended these periods (e.g. Finland, the Netherlands).

Despite the legal entitlements, challenges persist in practice. These include bureaucratic barriers,⁸¹ delays or difficulties with registration,⁸² and social and labour market integration,⁸³ particularly for women and vulnerable groups. Some Member States reported dependency risks when access to autonomous residence is delayed. Good practices in addressing these barriers include early integration programmes (e.g. Italy), specialised educational support (e.g. Serbia), and labour market reforms such as the abolition of the labour market test (e.g. Luxembourg).

54 BG, CY, EE (for international protection), EL, ES, FR (except international protection), IE (for international protection and minors), IT, LV (for international protection), NL, PL, SI.

55 AT (or by a person authorised by the family member), BE, CZ, DE, EE (except international protection), FI, FR (for international protection), HR, HU, IE (except international protection), LT, LU, LV (except international protection), NL, SE, SK and RS.

56 BG, CY, EE, EL, ES, IE (in some cases), LU, PL, SI.

57 FR, IE, LU, LV, NL, SI.

58 CY, EL, ES, FR, IE, IT, LT, LV, NL.

59 AT, BE, CZ, EE, FI, FR, HR, LT, LU, LV, NL, SE, SK.

60 AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, MT, SE, SI, SK, and RS.

61 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, PL, SE, SI, SK, and RS.

62 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, PL, SE, SI, SK, and RS.

63 AT, BE, BG, CY, DE, EE, EL, FI, FR, HR, LT, LU, LV (BIP), MT, NL, SE, SI, and RS.

64 BE, CY, DE, EE, EL, ES, FR, HR, HU, IT, LT, LU, LV (BIP), NL, SE, SI, and RS.

65 AT, BE, BG, DE, EE (possible in legislation, but not done in practice), EL, FI, HU, IE, IT, LT, LU, NL, SE.

66 AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, NL, PL, SK, and RS.

67 BE, CY, EE, EL, LT, LV (BIP and family members are exempt from the fee when applying for a residence permit for the first time), NL, SE, SK, and RS.

68 AT, CZ, EE, NL, SE, and RS.

69 BE, CY, CZ, LU, MT.

70 BE, DE, EL, FI, FR, IE, SE.

71 AT, BE, BG, EE, FI, FR, IE, IT, LU, LV, NL.

72 AT, BE, FI, FR, IE, IT, LU, SE.

73 AT, BE, DE, EE, FR, IE, IT, LU, LV, NL, SE.

74 AT, CY, CZ, EE, EL, FR, HR, IE, IT, LT, LU, SK.

75 BE, DE (access granted to integration courses (language and civic training), but generally not free of charge; participation is mandatory unless the person already has a good command of the German language), EE, FI, FR, IT, LU.

76 EE, HR, LT, LU, SI.

77 In Czech Republic and Greece, support measures are only available for refugees and their families.

78 AT, CZ, DE, EE, ES, FI, FR, HR, HU, IE, IT, NL, SE and RS.

79 For example, the minimum years of continuous residence required for family members applying for permanent residency is: three years: DE, HR, HU, SE; four years: FI; five years: AT, CY, CZ, EL, ES, IT, LT, LU, LV, NL, SK. In all cases, specific conditions can be and/or are applied, depending on national legislation.

80 For example, the minimum years of continuous residence required for family members applying for citizenship through naturalisation is: five years: BE, CZ, DE, IE, LU; eight years: EE, HU; 10 years: AT, IT, LT, SK. In all cases, specific conditions can be and/or are applied, depending on national legislation.

81 BE, FI, FR, IE, IT, LU.

82 FI, FR.

83 DE, IE, SI.

1. BACKGROUND AND RATIONALE FOR THE STUDY

1.1. INTRODUCTION

Family reunification has been one of the main avenues of legal migration in the European Union (EU) in recent decades. According to Eurostat data,⁸⁴ in 2023, 632 000 first residence permits were issued to family members joining non-EU citizens across the EU.

Family reunification is essential to ensure family unity and the respect of the right to family life pursuant to the international⁸⁵ and EU legal frameworks,⁸⁶ as well as the integration of third-country nationals in the country where they reside. It can also help to address labour market shortages when family members are integrated into the labour market.

Council Directive 2003/86/EC⁸⁷ (Family Reunification Directive) provides the core of the legal framework for family reunification of third-country nationals in the EU. It recognises the right to family reunification of legally staying third-country nationals and determines the conditions for the exercise of this right, as well as the rights of the family members concerned.⁸⁸ The Family Reunification

Directive was adopted on 22 September 2003, and it was the first EU legislation in the area of legal migration.

In 2017, the European Migration Network (EMN) published a study on family reunification of third-country nationals in the EU plus Norway. In 2024, EMN published an inform on family reunification for beneficiaries of international protection (BIP).⁸⁹ Since then, several developments have taken place, necessitating an update to the 2017 study. This includes changes in national legislation, several decisions of the Court of Justice of the European Union (CJEU) clarifying important questions on the implementation of the Family Reunification Directive and of the European Court of Human Rights (ECtHR) on Article 8 of the European Convention on Human Rights (ECHR), as well as the growing digitalisation of legal migration procedures in the EU Member States. The COVID-19 pandemic and other regional crises not only heightened practical challenges in family reunification procedures but also led to the development of new practices to address such challenges.

1.2. STUDY AIM AND SCOPE

This study provides an updated overview of legal and policy developments in EMN Member Countries (EU Member States except Denmark) and EMN Observer Countries (Norway, Georgia, Moldova, Ukraine, Montenegro, Armenia, Serbia, North Macedonia) in relation to the implementation of the Family Reunification Directive and national legislation on family reunification for countries not applying the Directive since the 2017 EMN study. Twenty-four EMN Member Countries⁹⁰ and one EMN Observer Country (Serbia) took part in this study.

The study provides an overview of the state of play of national legislation, policy and practice implementing the Family Reunification Directive and its case law in the EU

after 20 years of implementation. In the case of those countries not applying the Family Reunification Directive (Ireland and Serbia),⁹¹ it gives a broader comparative perspective of similar legislation and policies in place on family reunification. It also provides an overview of good practices and challenges in the area of family reunification in EMN Member and Observer Countries, as well as presenting an overview of relevant data on family reunification processes.

The overall aim of the study is to provide information to support policymakers developing family reunification policies and measures and facilitate the exchange of good practices between EMN Member and Observer Countries.

84 Eurostat, 'First permits issued for family reasons by reason, length of validity and citizenship', (migr_resfam) https://ec.europa.eu/eurostat/databrowser/view/migr_resfam_custom_17323409/default/table?lang=en, accessed 27 February 2025.

85 Article 8 ECHR.

86 Article 7 Charter of Fundamental Rights of the European Union.

87 Council Directive of 22 September 2003 on the right to family reunification, <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:251:0012:0018:en:PDF#:~:text=on%20the%20right%20to%20family%20reunification,-THE%20COUNCIL%20OF&text=This%20Directive%20respects%20the%20fundamental,Rights%20of%20the%20European%20Union>, accessed 9 October 2024.

88 DK and IE are not bound by the Family Reunification Directive.

89 European Migration Network (EMN), Family reunification for BIP - EMN inform, 2024, https://home-affairs.ec.europa.eu/document/download/80b77bb4-3184-427e-8e5e-a31ccc5540d5_en?filename=2024_EMN_inform_family_reunification.pdf, accessed 3 May 2025.

90 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK.

91 Ireland is not bound by the Family Reunification Directive. This also applies to EMN Observer Countries, as they are not EU Member States.

The study's main objectives are:

- To map current national legislation, policy and practice in EMN Member and Observer Countries in family reunification, including in the context of complementary pathways.
- To provide an overview of changes to family reunification law and policy since 2017, including following Court of Justice of the European Union (CJEU) judgments.
- To provide examples of challenges in family reunification processes and good practices to address such challenges.

- To provide data on the scale of family reunification over time (2017-2023 and 2024 where available), supplementing Eurostat data with national statistics, where available.

The target audience of the study is national policymakers involved in family reunification processes. The study is also of interest to other stakeholders working on family reunification, such as practitioners, non-governmental organisations (NGOs), and international organisations as well as the general public.



1.3. KEY QUESTIONS

This study addresses several key research questions:

- How does the EU legal framework, including relevant European case law, shape national legislation on family reunification, and how does it align with broader international legal standards? (section 2).
- What is the current state of family reunification for third-country nationals across EMN Member and Observer Countries, and how have legal, policy, and procedural changes since 2017 impacted family reunification trends and practices? (section 3).
- How do EMN Member and Observer Countries define sponsors and eligible family members for family reunification, and what variations exist in eligibility criteria across different categories of third-country nationals? (section 4).
- What are the key requirements for exercising the right to family reunification across EMN Member and Observer Countries, and how do these requirements vary for different categories of third-country nationals? (section 5).
- What are the procedures for submitting and examining an application for family reunification across EMN Member and Observer Countries, and how do these processes vary for different categories of third-country nationals? (section 6).
- What rights do family members acquire following family reunification across EMN Member and Observer Countries, and how do these rights vary in terms of access to education, employment, vocational training, and the ability to obtain an autonomous residence permit? (section 7).



1.4. STRUCTURE OF THE REPORT

In addition to this introduction, the study report contains the following sections:

- Section 2: EU and international legislative framework on family reunification, including case law.
- Section 3: Current state of family reunification.
- Section 4: Definition of sponsor and family member.
- Section 5: Requirements for exercising the right to family reunification.
- Section 6: Submission and examination of the application for family reunification.
- Section 7: Access to rights following family reunification.
- Section 8: Conclusions.

2. EU AND INTERNATIONAL LEGISLATIVE FRAMEWORK ON FAMILY REUNIFICATION, INCLUDING CASE LAW



2.1. EU LEGISLATION

The EU's legal framework regulates family reunification for third-country nationals, ensuring that legally residing migrants can reunite with their family members under specific conditions. The key EU legislative instruments governing family reunification, include the Family Reunification Directive⁹² and other relevant legal provisions that grant more favourable conditions to certain categories of migrants, such as highly qualified workers.

Family Reunification Directive

The Family Reunification Directive recognises legally staying third-country nationals' right to family reunification and determines the conditions and the procedures for the exercise of this right, as well as the rights of the family members concerned.⁹³ It is without prejudice to more favourable provisions laid down in national law and bilateral or multilateral agreements with third countries (Article 3(4)). The Family Reunification Directive was adopted on 22 September 2003 and was the first piece of EU legislation in the area of legal migration.

The first report on the implementation of the Family Reunification Directive was adopted in 2008.

In 2011, the Commission adopted the Green Paper on the right to family reunification of third-country nationals living in the EU. This was launched as part of a broad public consultation on family reunification, which gathered opinions from stakeholders and decided policy follow-up.

To ensure the full implementation of existing rules and guide the application of the Family Reunification Directive, in 2014, the European Commission adopted the

Communication on guidance for application of Directive 2003/86/EC on the right to family reunification.⁹⁴

The European Commission adopted a second implementation report in 2019.⁹⁵ This report gave an overview of the implementation of the Family Reunification Directive by EU Member States at the time. It highlighted some challenges remaining since the adoption of the 2014 Communication.

The 2020 Commission Recommendation on legal pathways to protection in the EU: promoting resettlement, humanitarian admission and other complementary pathways⁹⁶ called on EU Member States to facilitate access to the right to family reunification by putting in place family reunification assistance programmes that improve access to information and simplify the application process. They were also invited to provide pathways for admitting family members of BIP through humanitarian admission programmes such as family-based sponsorship schemes (Recital 12).⁹⁷

EMN Member Countries that are not bound by the Family Reunification Directive include Ireland and Denmark. Similarly, EMN Observer Countries are not bound by the Family Reunification Directive. In these countries, the rules applicable to family reunification are defined in national legislation.

Other EU instruments

Directive 2021/1883/EU (EU Blue Card Directive),⁹⁸ Directive 2016/801/EU (Students and Researchers Directive),⁹⁹ and Directive 2014/66/EU (Intra-Corporate

92 Directive (EU) 2003/86/EC of the Council of the European Union of 22 September 2003 on the right to family reunification, <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:251:0012:0018:en:PDF#:~:text=on%20the%20right%20to%20family%20reunification,-THE%20COUNCIL%20OF&text=This%20Directive%20respects-%20the%20fundamental,Rights%20of%20the%20European%20Union>, accessed 9 October 2024.

93 DK and IE are not bound by the Family Reunification Directive.

94 Communication from the Commission to the European Parliament and the Council on guidance for application of Directive 2003/86/EC on the right to family reunification, COM(2014)0210 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52014DC0210>, accessed 26 July 2024.

95 Report from the Commission to the European Parliament and the Council on the implementation of Directive 2003/86/EC on the right to family reunification, COM(2019)162 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019DC0162>, accessed 26 July 2024.

96 Recommendation (EU) 2020/1364 of the European Commission of 23 September 2020 on legal pathways to protection in the EU: promoting resettlement, humanitarian admission and other complementary pathways, <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32020H1364>, accessed 26 July 2024.

97 Ibid.

98 Directive (EU) 2021/1883 of the European Parliament and of the Council of 20 October 2021 on the conditions of entry and residence of third-country nationals for the purpose of highly qualified employment, and repealing Council Directive 2009/50/EC, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021L1883>, accessed 9 October 2024.

99 Directive (EU) 2016/801 of the European Parliament and of the Council of 11 May 2016 on the conditions of entry and residence of third-country nationals for the purposes of research, studies, training, voluntary service, pupil exchange schemes or educational projects and au pairing (recast), <https://eur-lex.europa.eu/eli/dir/2016/801/oj>, accessed 9 October 2024.

Transfer Directive),¹⁰⁰ provide for more favourable conditions for family reunification for the third-country nationals falling under their scope.

The **EU Blue Card Directive** includes more favourable rules on the condition of residence, removes pre-departure integration requirements, sets a more favourable time limit for processing and granting permits, establishes intra-EU mobility rights, and grants immediate access to the labour market for family members.¹⁰¹

Directive 2016/801/EU regulates the entry and residence of third-country nationals for the purposes of **research, studies, training, voluntary service, pupil exchange schemes or educational project and au pairing**.¹⁰²

Family members of third-country nationals to whom this directive applies should be granted access to the labour market in the EU Member State, except during periods of high levels of unemployment (Article 26). EU Member States must also ensure that the application for family members is processed at the same time as the application of the sponsor, if both applications are submitted at the same time (Article 26).

The **Intra-Corporate Transfer Directive** also grants favourable conditions for family reunification in EU Member States, including more favourable rights for family members.¹⁰³ Notably, the Member State should ensure simplified procedures to apply for family reunification (Article 19) and provide adequate social security coverage for family members of intra-corporate transferees (under certain conditions) (Article 18).

EU instruments also provide a framework for BIP and their family members. Directive 2011/95/EU (**Qualification Directive**)¹⁰⁴ sets the standards for applicants for international or subsidiary protection status. Article 23 requires EU Member States to grant residence permits to family members of BIP and underlines the need to preserve family unity. It is a revision of Council Directive 2004/83/EC, aiming to streamline the standards for the recognition and protection of BIP across EU Member States and incorporating relevant case law from CJEU rulings. It will cease to apply in July 2026, when it will be repealed by Regulation (EU) 2024/1347.¹⁰⁵

In May 2024, the EU adopted the **Pact on Migration and Asylum**, which includes Regulation 2024/1351 (Asylum and Migration Management Regulation).¹⁰⁶ The Regulation introduces more efficient family reunification procedures for applicants for international protection and BIP. Notably, Article 19 requires the EU Member States to inform applicants for international protection as soon as possible

of the provisions relating to family reunification. It encourages EU Member States to streamline rules on evidence required for family reunification applications to expedite the process where possible (Recital 54).

European case law

Through its rulings, the CJEU has shaped the standards on the application of the Family Reunification Directive. In recent years, it has issued several rulings on the interpretation and application of the Directive.

The CJEU has reviewed several cases in respect of the **age limits** when the child of a sponsor applies for family reunification. On 12 April 2018, the CJEU delivered the judgment on Case C-550/16 A & S,¹⁰⁷ based on Article 10 of the Family Reunification Directive. An unaccompanied minor applied for asylum while they were a minor and reached the age of majority before being granted refugee status. Their subsequent application for family reunification was rejected as they had become an adult by the time the application was submitted. The CJEU ruled that the status of an unaccompanied minor for family reunification must be determined by reference to the date of the asylum application and not the date when the decision to grant asylum is notified, as using the latter could lead to discrimination between minors submitting their application at the same moment but receiving the decision at different times.

In Case C-279/20 DE v XC,¹⁰⁸ a minor was refused family reunification as they had reached the age of majority when the sponsor, their father, had received his residence permit. On 1 August 2022, the CJEU ruled that the date for assessing the status of the family member as a minor is the date on which the sponsor's asylum application is submitted. Both cases set a precedent, ensuring that refugees are entitled to family reunification, regardless of whether the applicant or family member reaches the age of majority during the asylum or family reunification application process.

Other **procedural conditions for the submission of applications** for family reunification have also been assessed by the CJEU. Case C-380/17 K & B¹⁰⁹ reviewed whether an application that was four months after the status of refugee was granted to the sponsor could be rejected. The sponsor had failed to submit the application within the three-month period specified in Article 12 of the Family Reunification Directive. This provision provides for a more favourable family reunification regime for refugees, which exempts them from having to fulfil conditions of sufficient housing, insurance and resources

100 Directive (EU) 2014/66/EU of the European Parliament and of the Council of 15 May 2014 on the conditions of entry and residence of third-country nationals in the framework of an intra-corporate transfer, <https://eur-lex.europa.eu/eli/dir/2014/66/oj>, accessed 9 October 2024.

101 Directive (EU) 2021/1883 of the European Parliament and of the Council of 20 October 2021 on the conditions of entry and residence of third-country nationals for the purpose of highly qualified employment, and repealing Council Directive 2009/50/EC, <https://eur-lex.europa.eu/eli/dir/2021/1883/oj/eng>, accessed 24 February 2025.

102 Directive (EU) 2016/801 of the European Parliament and of the Council of 11 May 2016 on the conditions of entry and residence of third-country nationals for the purposes of research, studies, training, voluntary service, pupil exchange schemes or educational projects and au pairing (recast), <https://eur-lex.europa.eu/eli/dir/2016/801/oj>, accessed 9 October 2024.

103 Directive (EU) 2014/66/EU of the European Parliament and of the Council of 15 May 2014 on the conditions of entry and residence of third-country nationals in the framework of an intra-corporate transfer, <https://eur-lex.europa.eu/eli/dir/2014/66/oj/eng>, accessed 24 February 2025.

104 Directive (EU) 2011/95/EU of the European Parliament and of the Council of 13 December 2011 on standards for the qualification of third-country nationals or stateless persons as BIP, for a uniform status for refugees or for persons eligible for subsidiary protection, and for the content of the protection granted (recast), <https://eur-lex.europa.eu/eli/dir/2011/95/oj/eng>, accessed 7 March 2025.

105 Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024 on standards for the qualification of third-country nationals or stateless persons as BIP, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of the protection granted, amending Council Directive 2003/109/EC and repealing Directive 2011/95/EU of the European Parliament and of the Council, <http://data.europa.eu/eli/reg/2024/1347/oj>, accessed 23 June 2025.

106 Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1351>, accessed 28 February 2025.

107 Case C-550/16 A and S, 12 April 2018, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62016CJ0550>, accessed 30 April 2025.

108 CJEU Case C-279/20, Judgment of the Court (Third Chamber) on *Bundesrepublik Deutschland v XC*, 1 August 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62020CJ0279>, accessed 24 February 2025.

109 CJEU Case C-380/17, K & B, 14 January 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62017CA0380>, accessed 5 May 2025.

for a period of three months. The CJEU judgment of 7 November 2018 clarified that EU Member States were not required to process applications lodged by refugees under the more favourable rules of Article 12 if the application was lodged after the time limit of three months. However, other possibilities for introducing a new application must be made available and the individual circumstances must be considered.

In Case C-1/23 PPU Afrin,¹¹⁰ the CJEU ruled that national legislation requiring only in-person application submissions for family reunification was incompatible with EU law. Although Article 5 of the Family Reunification Directive leaves a margin of discretion to Member States regarding the procedure to submit an application for family reunification, it should be understood as precluding the requirement for applications to be submitted only in person at a diplomatic or consular post by the sponsor's family members if this would prove impossible or excessively difficult for them to travel to that post. Case C-1/23 PPU Afrin highlighted the need for EU Member States to show flexibility to enable sponsors or family members to submit applications by facilitating submissions and allowing for the use of remote means of communication.

In Case C-635/17, the CJEU delivered a judgment on the standard of proof required when assessing eligibility for family reunification, where it clarified that the "absence of official documentary evidence cannot be the sole reason for rejecting a family reunification application".¹¹¹ In such cases, the national authorities should conduct a case-by-case assessment of the conditions leading to an absence of official documentation, and additional proof may be required, such as additional checks and interviews. Both cases provide a precedent for EU Member States to follow

in respect of the conditions under which applications can be rejected.

Key rulings have guided the **legality of decisions to refuse residence permits** for the purpose of family reunification. Cases C-381/18 and C-382/18 involved two applicants who were convicted of criminal offences, resulting in a refusal to extend the residence permit (C-381/18) and the rejection of the applicant's request for a residence permit for the purpose of family reunification (C-382/18).¹¹² On 12 December 2019, the CJEU ruled that the refusal of a residence permit for the purpose of family reunification was justified in both cases as there was a threat to public policy (based on Article 6(1) and (2) of the Family Reunification Directive). The CJEU also clarified that such refusals must be based on a case-by-case assessment and duly consider personal circumstances in respect of the principle of proportionality.

The CJEU also delivered important rulings regarding the **family members who can benefit from family reunification**. In case C-560/20, the Court ruled that the sister of an unaccompanied minor who has been granted the status of refugee should have the right to be reunited with her brother if, given her state of health which requires constant attention, her non-inclusion in the family reunification procedure would force the parents of the unaccompanied minor to choose between reuniting with their son and abandon their daughter, or staying with their daughter and abandon their son. The Court recognises that in such a situation, the right to family reunification must be extended to the sister, as excluding her would prevent the parents from being able to effectively exercise their right to be reunited with their son.



2.2. BROADER INTERNATIONAL LEGAL FRAMEWORK

ECHR

The ECHR further influences the interpretation of the Family Reunification Directive, notably through Article 8. It prescribes the right to **respect for private and family life** for all (Article 8(1)) and prohibits public authorities from preventing individuals from exercising this right except under certain conditions (Article 8(2)).

In 2024, the ECtHR provided two key judgments on what constitutes 'family life' under Article 8 of the ECHR. In *Kumari v. the Netherlands* (Application No. 44051/20),¹¹³ the application of a third-country national applying to live with the sponsor, their adult son, was rejected, as there was limited **evidence of family life** between them. The ECtHR ruled that the application was inadmissible, as the relationship between parents and adult children requires additional proof of dependence beyond emotional ties. In *Martinez Alvarado v. the Netherlands* (Application No. 4470/21),¹¹⁴ the application for Martinez Alvarado to be reunited with his sisters in the Netherlands based on his dependence on his sisters due to an intellectual disability

was rejected by national authorities. The ECtHR ruled that the application was admissible, as family life in this case went beyond normal emotional ties, as Alvarado was fully dependent on his sisters.

Both rulings refer to family reunification where at least one of the sponsors was an EU Member State national and are therefore outside the scope of this study. However, the rulings provide important clarifications for EU Member States when providing judgments based on the definition of family life, as they demonstrate the need to review the relationship and relevant context in applications.

United Nations (UN) frameworks

The UN reinforces the importance of the **right of family reunification to preserve the unity of the family**. The 1951 Refugee Convention recommends that governments take measures to ensure the protection of the families of refugees. Notably, the Convention highlights the need to maintain the unity of the family.

110 CJEU Case C-1/23 PPU, Afrin, 30 May 2023, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62023CA0001>, accessed 11 April 2025.

111 CJEU Case C635/17, E., 13 March 2019, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:62017CJ0635>, accessed 5 May 2025

112 CJEU Joined Cases C-381/18 and C-382/18, Judgment of the Court of 12 December 2019 – G.S. (C-381/18), V.G. (C-382/18) v *Staatssecretaris van Justitie en Veiligheid*, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2020_054_R_0005, accessed 5 May 2025.

113 ECtHR Decision *Kumari v. the Netherlands* (44051/20), 19 November 2024, <https://hudoc.echr.coe.int/eng#%7B%22itemid%22%3A%22001-238680%22%7D>, accessed 13 June 2025.

114 ECtHR Decision *Martinez Alvarado v. the Netherlands* (4470/21), 10 December 2024, <https://hudoc.echr.coe.int/eng#%7B%22itemid%22%3A%22001-238325%22%7D>, accessed 13 June 2025.

Signatories, including the 34 EMN Member and Observer Countries, have ratified or acceded to the Convention and are therefore bound by its provisions.

The importance of preserving the unity of the family is further highlighted in the UN Convention on the Rights of the Child. Article 9 commits signatories of the Convention to **prevent the separation of a child and their parents** against their will. Article 10 commits the State Parties to **assess applications for family reunification in a humane and timely manner** in situations where the sponsor is a child. Again, the 34 EMN Member and Observer Countries have ratified or acceded to the UN Convention on the Rights of the Child.

3. OVERVIEW OF FAMILY REUNIFICATION

This section presents an overview of national statistics on family reunification (section 3.1), including applications submitted and authorisations granted, as well as applications rejected. It also presents an overview of the development of the family reunification framework (section 3.2), including the differentiation between family formation and

family reunification, legal and policy changes implemented, and planned changes. The section concludes with an overview of family assistance programmes and alternative avenues for family members who do not qualify for family reunification under the Family Reunification Directive (section 3.3).



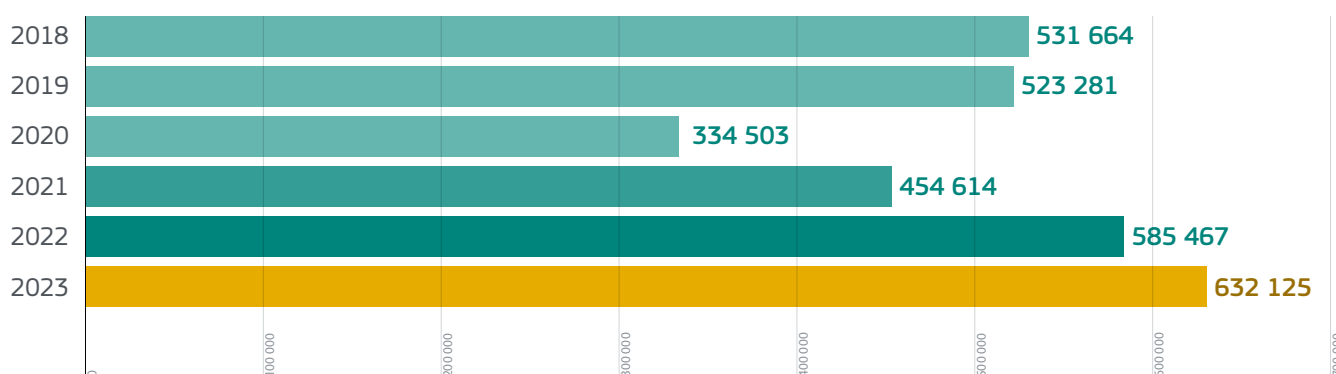
3.1. STATISTICAL OVERVIEW

The following sections present Eurostat data on the numbers of first residence permits for family reasons granted to **non-EU citizens** between 2017 and 2023,¹¹⁵ as well as a summary of data provided by seven EMN Member Countries¹¹⁶ on positive and negative decisions on first permits issued for family reasons to non-EU citizens. Annex 1 provides further details.

Trends in first permits issued for family reasons to non-eu citizens from Eurostat data

According to Eurostat data,¹¹⁷ the number of first-time residence permits granted for family reunification to family members joining a non-EU citizen in the 27 EU Member States (EU-27) fluctuated from 531 000 in 2018 to 632 000 in 2023 (see Figure 1).

Figure 1: First permits issued for family reasons by reason, length of validity and citizenship, EU-27



Source: Eurostat database (migr_resfam). Data extracted on 4 May 2025.

Notes: Data for FR not available from 2020 onwards; data for IE low reliability.

In 2023, the number of first permits issued for family reasons to relatives of non-EU citizens varied from 1 152 issued in Estonia to 168 536 permits issued in Germany.

The number of permits issued per 1 000 people on the EU-level was 1.4 permits, ranging between 0.1 in Romania, and 6.8 permits issued in Cyprus (see Figure 2).¹¹⁸

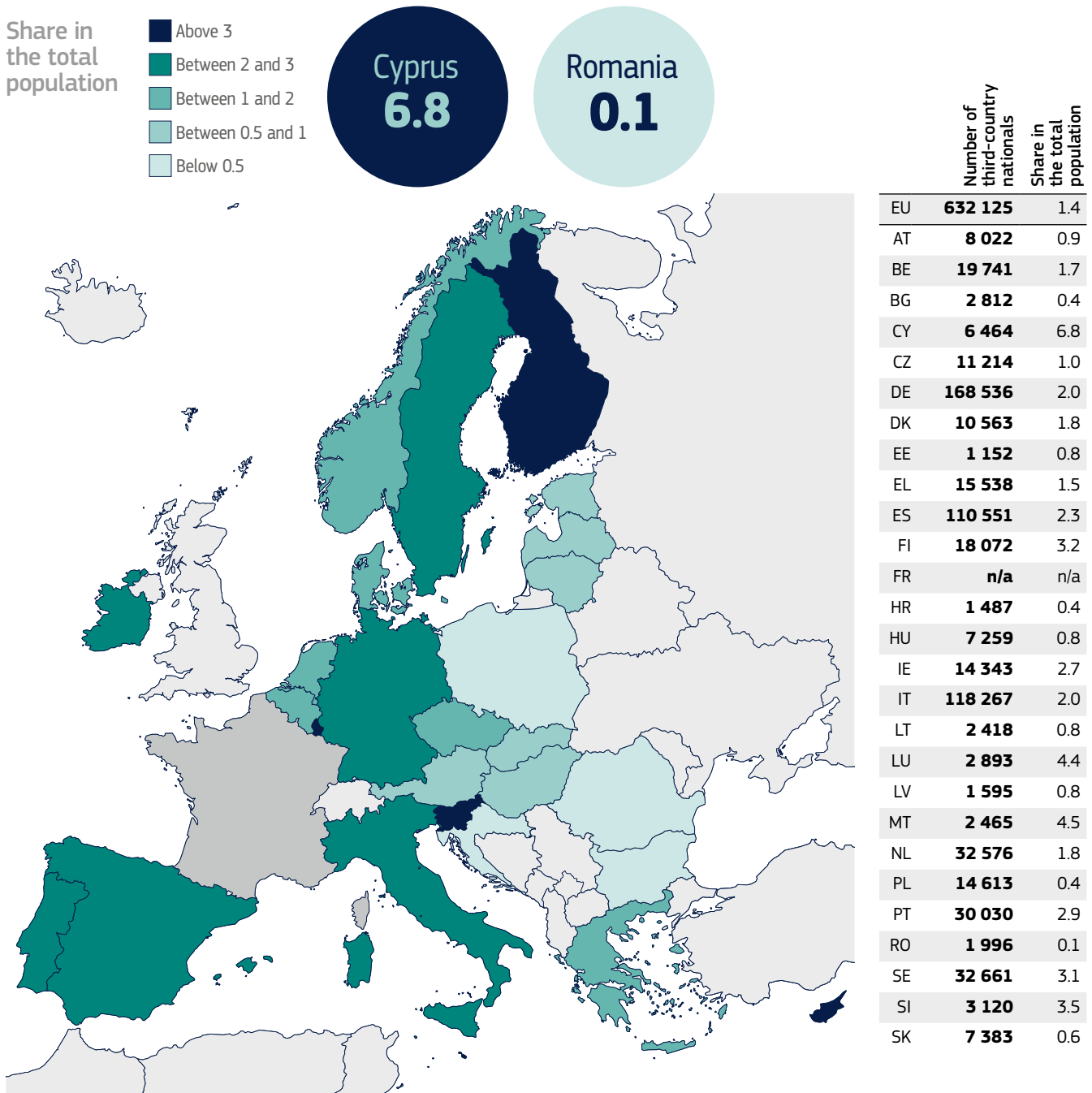
¹¹⁵ Eurostat data on first permits issued for family reasons by reason, length of validity and citizenship (migr_resfam) can be disaggregated to show the numbers of permits issued to non-EU family members of non-EU sponsors residing in an EU Member State. It is not possible to disaggregate the data on all valid permits by reason, length of validity and citizenship on 31 December of each year (migr_resvalid) and the data show family members of both EU and non-EU citizens. At the time of publication, Eurostat data for 2024 have been published, however temporary gaps exist in data for 'Family member joining a non-EU citizen'. Data from 2024 have therefore not been included to ensure accurate representation and comparability. Eurostat data on residence permits for family reunification are only available for France until 2019.

¹¹⁶ CY, FI, LU, MT, PT, SE, SI.

¹¹⁷ Eurostat, First permits issued for family reasons by reason, length of validity and citizenship, https://ec.europa.eu/eurostat/databrowser/view/migr_resfam/default/table?lang=en, accessed 11 June 2025.

¹¹⁸ Eurostat population data [demo_pjan] were used to calculate the number of first permits issued for family reasons to non-EU citizens per 1 000 people.

Figure 2: First permits issued for family reasons to relatives of non-EU citizens in 2023, EU-27



Source: Eurostat database (migr_resfam). Data extracted on 4 May 2025.

Notes: Eurostat data on residence permits for family reunification are only available for France until 2019.

Trends in first permits issued for family reasons to non-eu citizens from national level data

The data presented in this section on first permits issued for family reasons to non-EU citizens have been collected by national authorities and reported by the EMN National Contact Points (NCP) from seven EMN Member Countries¹¹⁹ for the purposes of the present study. Key limitations should be taken into consideration when reading this section, as different data is collected across

EMN Member Countries, and the data has been reported in different formats with differing disaggregation. Therefore, the data below have not been harmonised and are not comparable. An overview of the data reported by the seven EMN NCPs can be found in Annex I.

Between 2018 and 2024, the number of applications for first permits for family reasons ranged from 1 038 in Latvia to 217 969 in Poland. First permits issued for family reasons to non-EU citizens varied from 144 granted in Romania to 156 185 in Poland. Four EMN Member

119 CY, FI, LU, MT, PT, SE, SI.

Countries¹²⁰ reported data disaggregated by sex (see Annex II). For example, in Italy, more applications were received for female family members than male family members in 2023.¹²¹ In Bulgaria, more female sponsors have been granted first permits for family reasons than male sponsors each year between 2017 and 2024, except in 2023, during which the applications for 17 male sponsors and seven female sponsors were approved for family reasons.

EMN Italy and Poland also reported the number of applications received disaggregated by the citizenship of the family member. In 2023, the highest number of applications received by Italian authorities for first permits for family reasons were for family members who are Albanian citizens (26 063), followed by Moroccan (18 190) and Indian (8 607) citizens. In 2024, the highest number of applications received by Polish authorities for first permits for family reasons were for family members with Ukrainian citizenship (39 947), followed by those with Belarusian (7 702) and Indian (2 400) citizenships.



3.2. DEVELOPMENT OF THE FAMILY REUNIFICATION FRAMEWORK

Family formation and family reunification

Sixteen EMN Member and Observer Countries¹²² do not distinguish between cases where the kinship is a new family relationship (family formation), and cases where a family relationship already exists (family reunification), while eight EMN Member and Observer Countries¹²³ make such a distinction. In addition, Ireland, Latvia, Lithuania and Slovenia make a distinction in certain cases (see Annex 3). For example, in Lithuania, an exception applies when the sponsor holds a temporary residence permit based on having obtained long-term resident status in another EU Member State. In that case, family reunification is permitted only if the family was already established in the EU Member State where the sponsor acquired long-term resident status.

In most cases, family formation and family reunification are distinguished via different legal provisions or requirements, and the rules for family reunification are, in some cases, more favourable than those for family formation.¹²⁴ For example, in Belgium,¹²⁵ the age requirement for family formation for spouses and legally registered partners is 21 years. This minimum age is reduced to 18 in certain cases when the marital bond or partnership already existed before the sponsor arrived in Belgium. In Cyprus, family reunification permit holders receive more benefits compared to those under family formation (see Annex 3).

Annex 3 presents a summary of the approaches within the eight EMN Member Countries with a formal distinction and tangible differences in rights and requirements. The Netherlands is an exception, as it follows a formal distinction but the conditions and rules that apply are the same in practice.

Even in those countries with no formal distinction between family formation and family reunification, legislation may incorporate separate provisions for family formation. For example, Greece has a national provision that applies family reunification provisions to marriages or registered

partnerships formed within Greece between third-country nationals with a residence permit, and includes children born in Greece, who are covered by the legality of the parents until they apply for a separate residence permit for the child. While Sweden applies the same rules regardless of when family was formed, family reunification assessments include discretionary elements, and the timing of family formation may impact requirement exemptions for sponsors (e.g. sufficient housing or financial resources requirements).

Legal and policy changes

Almost all EMN Member and Observer Countries¹²⁶ have introduced substantial legal and policy changes since the last comprehensive study on family reunification in 2017, such as the further facilitation of family reunification for skilled and highly skilled third-country nationals. At the same time, the changes introduce stricter requirements for categories of third-country nationals that are not classified as skilled and highly skilled and tighten integration requirements, based on EMN Member Countries' specific contexts and priorities (see section 3.2.1.3).

The main legal and policy changes since 2017 include:

1. Amendments to legal frameworks, including amendments linked to new or revised EU Directives with family reunification elements.
2. Changes in attraction, labour market access of family members, and integration requirements.
3. Increase of restrictions and administrative changes.

Amendments to legal frameworks

The main **amendments to legal frameworks** include changes to migration legislation, as reported by 16 EMN Member and Observer Countries.¹²⁷ In nine cases, the amendments concerned **facilitation of family reunification**.¹²⁸ Croatia, for example, reduced the residence period requirements (waiting period) from two years to

¹²⁰ BG, FI, IT, LV.

¹²¹ In 2023, 76 644 applications for first permits for female family members were received by Italian authorities, and 63 626 applications for male family members were received.

¹²² BG, DE, EE, EL, ES, HR, HU, IE, IT, LT, LU, LV, PL, SE, SK, and RS.

¹²³ AT, BE, CY, CZ, FI, FR, MT, NL.

¹²⁴ AT, BE, CY.

¹²⁵ Under a recent government agreement (so-called Easter agreement of 11 April 2025), the age limit for both family reunification and family formation with a spouse or legally registered partner has been raised to 21 years, where permitted by European legal instruments.

¹²⁶ AT, BE, BG, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

¹²⁷ AT, BG, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, PL, SE, SI, and RS.

¹²⁸ EE, ES, FI, FR, HR, IT, LT, LU, LV, SI.

one year in 2020. After suspending family reunification's rights for beneficiaries of subsidiary protection in 2016, Germany partially lifted the suspension in 2018 by allowing for a contingent of 1 000 persons per month to reunite with their family based on humanitarian grounds. Similarly, Estonia expanded the eligibility of registered partners among recognised family members, and France extended the eligibility for family reunification to siblings of BIP. Some EMN Member Countries, however, introduced more **restrictive provisions**.¹²⁹ Austria introduced in 2017 quota requirements for family members of sponsors with specific residence permits, which for example apply if family members of third-country nationals are to be issued a "Red-White-Red Card Plus" residence title and the sponsor holds either a Permanent Residence – EU" residence title or a "Red-White-Red Card Plus" residence title, with certain exceptions. The annual quota (quota places) defined in the Settlement Regulation limit the number of residence permits that can be issued. In 2021, Sweden raised the age requirement for spouses from 18 to 21 years and introduced temporary residence permits. Under the amended Swedish Aliens Act, third-country nationals moving to Sweden for family reunification or family formation purposes are granted temporary residence permits. These can later be converted into permanent permits if certain requirements are fulfilled. A general maintenance requirement applies to the granting of residence permits for family reunification, with certain exceptions.

Six EMN Member Countries¹³⁰ have adapted their legislation following **CJEU/ECTHR rulings**. Belgium, the Netherlands and Finland¹³¹ have incorporated CJEU case law on the time limits to submit applications for family reunification for family members of unaccompanied minors who reached adulthood during the asylum process, in response to the CJEU judgment in A and S (C-550/16). Belgium has changed its administrative practice to allow family members who find it impossible or excessively difficult to submit their application in person at the diplomatic post to apply for a visa for family reunification by email. This implements the CJEU Afrin judgment (C-1/23 PPU), which concerned Belgium.

Changes in attraction, labour market access of family members and integration requirements

Family reunification plays a role in **attracting skilled third-country nationals**. Ten EMN Member Countries¹³² reported the implementation of pathways for skilled third-country nationals and their family members. In 2022, Austria introduced the option for employers to submit simultaneous applications for employees and family members to make Austria more attractive to skilled workers from abroad. Finland introduced expedited services for family members of specialists and start-up entrepreneurs in 2022. Lithuania implemented immediate family reunification for families of doctoral students in 2018 and established a dedicated service centre (International House Vilnius)¹³³ offering services to foreign talent

and their families. In 2024, Hungary introduced differentiated validity periods with longer durations (4-10 years) for residence permits of family members of high-skilled third-country nationals. Germany extended the right of family reunification to parents and parents-in-law of highly qualified workers who received the first residence title on the grounds of an EU Blue Card, ICT, or similar national regulations since 1 March 2024.

In 2019, Ireland granted immediate and full access to the labour market for spouses and de facto partners of critical skills employment permit holders and researchers on a hosting agreement, without requiring them to secure a separate employment permit. In 2024, this right was extended to spouses and partners of almost all employment permit holders. Similarly, Latvia, Luxembourg, the Netherlands and the Slovak Republic expanded immediate access to the labour market for family members of employed persons. The Netherlands removed the work permit requirement for family members of self-employed persons in 2020, while Luxembourg eliminated the labour market test requirement for family members of legally resident third-country nationals in 2023.

France, the Netherlands and Slovenia reported changes in their **integration** requirements. France now requires an A2-level French language diploma for multi-year residence permits, while Slovenia introduced a Slovenian language requirement at a subsistence level, including basic routine communication. The Netherlands reintroduced mandatory pre-departure civic integration programmes for Turkish nationals, and France implemented a commitment contract to respect the principles of the French Republic.

Seven EMN Member Countries reported implementing **targeted provisions for certain populations**.¹³⁴

Ireland, for example, established the Afghan Admission Programme in response to the situation in Afghanistan in 2021. The Irish Humanitarian Assistance Programme, which ran from 2017-2021, provided additional resettlement places for refugees with family in Ireland who were otherwise ineligible for family reunification. Spain expanded its eligibility criteria, including provisions for adult children acting as caregivers, and reduced the financial requirements for reunification of minor children. Luxembourg opened the employment market for family members – third-country nationals, holders of a Luxembourg residence permit for family reunification purposes – as soon as they arrive in Luxembourg, for all salaried or self-employed activities.¹³⁵

Increase of restrictions and administrative changes

Austria, Finland and the Netherlands implemented measures to **strengthen their verification processes**. Austria introduced enhanced document scrutiny and increased DNA testing requirements for family members of BIP in 2024. Finland introduced the requirement that identity must be reliably verified by means of a valid national travel document. Prior to the amendment, it was possible for the applicant to verify their identity by means

129 AT, EE, FI, FR, HU, IT, SE, SI.

130 BE, FI, LU, NL, SE, SK.

131 As of June 2025, this applies only to minor sponsors who have been granted refugee status in the asylum process.

132 AT, DE, FI, FR, HU, IE, LT, LU, NL, SK.

133 International house Vilnius, 'You are welcome to Vilnius', n.d., <https://ihvilnius.lt/>, accessed 7 May 2025.

134 ES, FI (unaccompanied minors), IE, LT, LU, SI.

135 Exposition of motives of bill n° 8227. Parliamentary document n° 8227/00 of 30 May 2023, p. 12.

of a travel document issued by another country, for example. The Netherlands closed a legal gap to enable targeted investigations of sham marriages and partnerships in family reunification cases.

Four EMN Member Countries¹³⁶ implemented measures to **restrict eligibility** or changed the requirements/conditions for family reunification. For example, spouses of students could previously apply for a residence permit in Estonia immediately, but they must now wait two years (except for doctoral studies). Italy also adopted a legislative change increasing the waiting period from one to two years and increasing the housing requirement for family reunification. Sweden eliminated the maintenance requirement exemption for beneficiaries of subsidiary protection.



3.3. PLANNED CHANGES

Twelve EMN Member Countries¹³⁸ reported planned changes to the law, policy or administrative practice on family reunification. Twelve EMN Member and Observer Countries¹³⁹ reported no upcoming changes up to February 2025 (which is the period analysed for this study).

Planned changes include **more restrictive legislation and policies** on family reunification in certain cases,¹⁴⁰ with Belgium, Finland and the Netherlands planning to introduce mandatory waiting periods, typically of two years, before beneficiaries of subsidiary protection, and refugees in certain cases, can apply for family reunification. Sweden launched a study specifically targeting more restrictive family reunification legislation across multiple dimensions. It appointed an inquiry in 2024 to study and propose more restrictive family reunification legislation, examining requirements to be a sponsor, categories of eligible family members, potential restrictions to maintenance requirements, possible sickness insurance requirements, increased usage of DNA analysis to prove biological kinship, and revision of legislative structure and terminology.

The Netherlands announced significant changes to family reunification, including the adoption of a two-status protection system that differentiates between refugees and beneficiaries of subsidiary protection, assigning different rights to each group, imposing a two-year waiting period for beneficiaries of subsidiary protection, restricting eligible family members to nuclear family only for refugees and beneficiaries of subsidiary protection,

Eight EMN Member Countries¹³⁷ reported **administrative changes** to improve service delivery and reduce processing times. Italy implemented digital application submission in 2017, while Lithuania implemented its comprehensive Migration Information System (MIGRIS) in 2019. Germany fully digitalised the visa application procedure by the end of 2024. Luxembourg reduced the deadline for granting authorisations of stay to family members of EU Blue Card (to six months) and ICT residence permit holders (to 90 days). Italy extended residence permit renewal periods from two to three years, while Belgium extended the entry visa validity from 6 to 12 months (compared to the previous initial six-month period, after which it could be extended by six months if the visa holder was prevented from travelling to Belgium during the initial period).

and extending application processing times from 90 days to nine months. In Germany, the new governing coalition plans to suspend family reunification for beneficiaries of subsidiary protection.

Other changes relate to legal and administrative revisions to reduce application burdens or facilitate **access to the labour market**. Croatia adopted amendments to the Aliens Act on 21 February 2025, which came into effect on 15 March 2025. The Act stipulates that temporary stay for the purpose of family reunification may be granted to a minor child if both parents have been issued stay and work permits in accordance with Article 97 of the Act, as well as to a minor child of a single parent who has been issued a stay and work permit in accordance with Article 97 of the Act. Latvia has drafted a new Immigration Law (currently before parliament) that does not significantly change family reunification regulations but **reduces the administrative burden** by extending temporary family reunification permits from one to two years for certain categories of applicant. Estonia adopted legal amendments that will allow third-country nationals and the person inviting them to Estonia (employer, educational institution, spouse, close relative) to communicate electronically with Estonia on a one-stop-shop basis and to transmit data and documents on residence and work in Estonia to the Estonian Tax and Customs Board, the Labour Inspectorate and the Estonian Unemployment Insurance Fund via the Police and Border Guard Board (PBGB).



3.4. FAMILY ASSISTANCE PROGRAMMES AND ALTERNATIVE AVENUES

Family assistance programmes

Germany introduced family assistance programmes in some states, working together with the International Organization for Migration (IOM). The IOM provides advice to visa applicants, especially in

bureaucratic matters, and with a focus on vulnerable persons. The service is currently available in 10 states (out of 16 states in total). France and Italy also introduced family assistance programmes to improve family reunification processes for refugees, via the 'Foster cooperation for improving access to protection' (SAFE) project in France and

¹³⁶ EE, FI, IT, SE.

¹³⁷ BE, DE, EL, ES, IT, LT, LU, NL.

¹³⁸ BE, BG, DE, EE, FI, HR, IE, LV, NL, PL, SE, SK.

¹³⁹ AT, CY, CZ, EL, ES, FR, HU, IT, LT, LU, SI and RS. Based on information provided by February 2025.

¹⁴⁰ BE, DE, FI, NL, SE.

via language and civic education prior to family reunification in Italy (see Box 1).

Box 1: Family assistance programmes in France and Italy

SAFE project in France and Italy

France introduced the SAFE project in 2021, a three-year initiative co-funded by the European Commission and implemented in partnership with Italy. This project ran until 2023 and was coordinated by Forum Réfugiés, along with several European partners.

The SAFE project aimed to improve access to protection through sponsorship programmes, humanitarian corridors, family reunification processes for refugees, and student mobility opportunities. The French Red Cross played a significant role through its Restoring Family Ties unit, which supported protected persons in bringing their family members to France.

Family Assistance Framework in Italy

Italy has established information and guidance services at municipal level, offering comprehensive assistance including counselling, application support, and integration services. Between 2017 and 2019, the Ministry of Labour implemented a programme providing civic and language training for third-country nationals prior to entering Italy for family reunification.

While the remaining EMN Member and Observer Countries¹⁴¹ did not introduce any programmes, four¹⁴² provided information on support for family reunification through existing services.

Latvia offers more lenient document requirements for family members of BIP. From 1 January 2025, Latvia also exempts these individuals from state fees for first-time residence permit applications. While no dedicated programme exists, family members can access social assistance from NGOs and social services that support BIP.

Seven EMN Member Countries¹⁴³ reported services provided by NGOs such as the Red Cross. For example, Lithuania and Luxembourg reported the Red Cross 'Family Links Restoration Programme', which assists individuals separated by conflict, disaster or migration. Such programmes are also implemented in other countries. In Austria, the Red Cross offers individualised advice and support for sponsors and their families seeking reunification. The

Finnish Red Cross offers practical support, including travel arrangements for family members of quota refugees.

Alternative avenues

Most EMN Member Countries¹⁴⁴ provide alternative avenues to receive a residence permit for family members who do not qualify for family reunification under the Family Reunification Directive or national legislation on family reunification. Finland and Slovenia did not report any alternative avenues.

Eight EMN Member Countries¹⁴⁵ reported using **Article 8 of the ECHR** as a basis for providing an alternative avenue for family reunification. In the Netherlands, the Immigration and Naturalisation Service (IND) assesses each case individually, considering strength of family ties, duration of residence, and the impact return would have on family life. Similarly, in Luxembourg and France, permits are provided based on personal or family ties where refusal would disproportionately infringe on private and family life. In Sweden, supplementary rules apply when standard requirements are not met, with particular consideration for cases where there is a special dependency relationship with the sponsor. Cyprus operates a similar system.

Six EMN Member and Observer Countries¹⁴⁶ offer residence permits or visas on **humanitarian** grounds, considering factors such as family connections, social integration, or exceptional circumstances. For example, Belgium offers humanitarian visas in exceptional cases, which are rarely granted except for minor siblings of unaccompanied minors who would be left isolated in their country of origin. Serbia provides temporary residence permits for humanitarian reasons to foreigners demonstrating family, cultural or social ties, considering education, work activities and language knowledge. Latvia is considering temporary residence permits on humanitarian grounds for cases not covered by existing law. Germany has a provision to grant family reunification on humanitarian grounds, with some federal states operating humanitarian reception programmes for BIPs who do not qualify for the conventional family reunification procedure.

Seven EMN Member Countries¹⁴⁷ have **specific provisions for children born within their territories**. France allows residence for children born in France, who have lived there continuously for eight years, and attended French schools for five years after the age of ten or have lived in France since reaching the age of 13 with at least one of their parents. Finland grants the same protection status to children as the one held by their parents.

141 AT, BE, CZ, CY, EE, EL, ES, HU, HR, FI, IE, LT, LU, LV, SE, SI, SK, and RS.

142 AT, FI, LT, LV.

143 AT, ES, FI, FR, LT, LU, SI.

144 BE, CY, CZ, DE, EE, EL, ES, FR, HR, HU, IE, IT, LU, LV, NL, PL, SE, SK, and RS.

145 AT, BE, CY, FR, LU, NL, SE, SK.

146 BE, DE, ES, HR, IT, LV, and RS.

147 EE, EL, ES, FI, FR, HR, HU.

4. DEFINITION OF SPONSOR AND FAMILY MEMBER

This section addresses the eligibility of a sponsor for family reunification (as per Article 3 of the Family Reunification Directive), including the definition of sponsors, as well as specificities regarding beneficiaries of subsidiary

protection or similar statuses (section 4.1). It also describes which family members are entitled to family reunification (section 4.2).



4.1. WHO CAN BE A SPONSOR?

Definition of sponsors

This section outlines who is eligible to be a sponsor to an application for family reunification, including the different categories, as well as in some cases more favourable conditions for specific categories of sponsors.¹⁴⁸ The Family Reunification Directive sets out two requirements in respect of the residence of the sponsor, namely that they have a permit that is valid for at least one year and a reasonable prospect of acquiring permanent residence.

In all EMN Member and Observer Countries a sponsor of an application for family reunification can be a third-country national in possession of a temporary or permanent residence permit or a refugee.

Other categories of persons who can be sponsors include:

- Students¹⁴⁹ with a valid residence permit and proof of financial means.
- Workers,¹⁵⁰ including highly qualified workers.
- Researchers.¹⁵¹
- EU Blue Card holders.¹⁵²
- Intra-corporate transferees.¹⁵³

Ten EMN Member Countries reported waiting periods before allowing sponsorship.¹⁵⁴ In Spain, there is a general waiting period of one year of legal residence and the sponsor must have applied for at least another year of residence. Exceptions are applied to highly qualified persons and BIP. In Estonia, when applying for a temporary residence permit to settle with a spouse or registered partner who is a third-country national with a temporary residence permit for studies, the spouse or registered

partner must have lived in Estonia on a residence permit for at least two years (except for doctoral studies) before being allowed to ask for family reunification. In Lithuania, an exception applies when the sponsor holds a temporary residence permit based on having obtained long-term resident status in another EU Member State. In this case, family reunification is permitted only if the family was already established in the EU Member State where the sponsor acquired long-term resident status. Otherwise, the standard family reunification requirements apply: the sponsor must have resided in Lithuania for at least the past two years, hold a temporary residence permit valid for at least one more year, and demonstrate reasonable prospects of qualifying for permanent residence in Lithuania. France requires 18 months of legal residence,¹⁵⁵ while Italy requires two years of legal residence (except for refugees and beneficiaries of subsidiary protection and applications for minor children). In Cyprus and Ireland, the waiting periods depends on the situation/category. In Latvia and Austria, there is a waiting period of two years and three years respectively for beneficiaries of subsidiary protection.

Beneficiaries of subsidiary protection or holders of similar protection status

The Family Reunification Directive does not, in principle, apply to a sponsor who is a beneficiary of subsidiary protection. Notwithstanding the general exclusion from the scope of the Directive of beneficiaries of subsidiary protection, the European Commission's guidance on the application of the family reunification directive recommends that they are treated in the same way as refugees, as they face similar difficulties.

¹⁴⁸ AT, BE, CY, DE, EE, EL, ES, FI, FR, IE, IT, LT, LU, LV, NL, SE, SI.

¹⁴⁹ AT, BE, CZ, DE, EE, ES, FI, FR, IE (in certain limited circumstances), IT, LT, LV, NL, SI, SK.

¹⁵⁰ AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, IE, IT, LT, LU, LV, NL, SI, SK.

¹⁵¹ AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, IE, IT, LT, LU, LV, NL, PL, SI, SK.

¹⁵² AT, BE, CZ, DE, EE, EL, ES, FI, FR, IT, LT, LU, LV, NL, SE, SI, SK.

¹⁵³ AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, IE, IT, LT, LU, LV, NL, PL, SE, SI, SK.

¹⁵⁴ AT, CY, EE, EL, ES, FR, IE, IT, LT, LV. In June 2025, Finland also added the two-year period for BIP. For sponsors with refugee status, this applies only to family formation/ new family members.

¹⁵⁵ Family reunification of refugees is not subject to a condition of residence in the country prior to the application.

Most EMN Member and Observer Countries¹⁵⁶ allow this category of non-EU nationals to apply for family reunification, with the exception of four EMN Member Countries.¹⁵⁷ However, while most EMN Member Countries¹⁵⁸ allow beneficiaries of subsidiary protection to apply for family reunification under the same conditions as refugees, some EMN Member and Observer Countries¹⁵⁹ apply specific limitations for beneficiaries of subsidiary protection. Latvia and Austria apply a waiting period for beneficiaries of subsidiary protection of two and three years respectively, unlike refugees for whom there is no waiting period in place. In Belgium, the new government is planning to introduce a two-year waiting period, but these changes have not yet been adopted, nor presented to the lawmakers. Moreover, in Austria, Finland and Sweden, only family members of sponsors with refugee status are exempt from this

requirement, while beneficiaries of subsidiary protection must meet the stable and regular income requirement. (see Section 5.1.3 for more details).

In France, family members receive a **multi-year permit**, valid for a maximum of four years and marked 'family member of a beneficiary of subsidiary protection'. After four years of residing in France with this permit, the beneficiary of subsidiary protection or the members of their family may apply for a resident card. Family members of refugees receive a 10-year residence permit. In Slovenia, the law grants the right to family reunification to third-country nationals who have been granted subsidiary protection for more than one year, with the condition that the protection is extended if initially granted for just one year.



4.2. DEFINITION OF FAMILY MEMBERS

As per Article 4(2) and 4(3) of the Family Reunification Directive, EMN Member Countries may extend the scope of family reunification beyond core members of the family, which includes spouses and minor children, including adopted children. The Directive allows Member State to grant family reunification with adult children who are in a situation of dependency, parents, same-sex partners, non-married partners, foster children, etc.

Minor children

In all EMN Member and Observer Countries, the maximum age for a child to benefit from family reunification is 18 years, with children under this age considered minors. Seventeen EMN Member Countries have specific provisions on determining minority status and exceptions to the age limit,¹⁶⁰ with 16 EMN Member Countries¹⁶¹ specifying that a child must be under 18 years at the time of submitting the application, and 11 EMN Member Countries requiring minors to be unmarried.¹⁶²

In 11 EMN Member Countries,¹⁶³ special provisions apply for **children of BIP**. As per the CJEU judgment C-279/20,¹⁶⁴ if a child reaches 18 before or shortly after their parent is granted the refugee status, applications can be submitted up to three months after the decision. In Austria, detailed case law from the Supreme Administrative Court provides for facilitated family reunification if unaccompanied minors reach majority during the asylum procedure, with a two-stage application process required if they reach majority during the family reunification procedure. If the person granted asylum only reaches the age of majority during the family reunification procedure, the family procedure is no longer available to their parent(s) under Art. 34 Asylum Act. In these circumstances, the special case of "facilitated family reunification" under the Settlement and Residence Act developed by case law

applies (Supreme Administrative Court, 2017, 2018c;). In practice, this means that when unaccompanied minors who have been granted asylum seek family reunification, their parents must first submit an application under the Asylum Act and – if the child later reaches the age of majority – another application under the Settlement and Residence Act ("two-stage application process").

In France, the age limit is 19 years for children in family reunification of BIP, which, since November 2023, also applies to children from previous unions. Their age is assessed on the date the application was submitted. In Latvia, the child must be a minor at the time of applying for a residence permit for family reunification, but after reaching adulthood, they can continue to reside in the country on that ground if they are not married or do not have a separate household.

Adult children

The majority of EMN Member and Observer Countries¹⁶⁵ permit family reunification with adult children under specific circumstances, although the conditions vary significantly across jurisdictions.

In seven EMN Member Countries,¹⁶⁶ family reunification with adult children is not possible, although Cyprus reported that the decision is made on a case-by-case basis. In Germany, adult children who would not usually be eligible for family reunification may fall under the general exception hardship clause. Adult children do not have a right to family reunification in Sweden, but they may be granted residence permits under specific circumstances, such as dependency, special ties to Sweden, considerations under Article 8 of the ECHR, or exceptionally distressing circumstances for the applicants already in the country. Similarly, in Finland, an adult child of a sponsor may be issued a

156 AT, BE, DE, EE, ES, FI, FR, HR, IE, IT, MT, LT, LU, LV, NL, PL, SE, SI, SK, and RS.

157 CY, CZ, EL, HU.

158 BE, BG, DE (with exceptions), EE, ES, FR, HR, IE, IT, LT, LU, MT, NL, PL, SI, SK, and RS.

159 AT, FI, LV, SE.

160 AT, BE, BG, CY, CZ, EE, EL, ES, FI, FR, HR, IE, IT, LT, LU, MT, NL, PL, SE, SI, SK.

161 AT, BE, CY, CZ, EE, EL, ES, FI, FR, IE, IT, LT, LU, LV, SE, SI.

162 BE, CY, DE, EE, EL, FI (only if sponsor has refugee status), IE, IT, LT, LV, SK.

163 AT (for BIP, different points in time are taken into account. Child as sponsor: date of the decision; parents as sponsors: date of application), BE, CZ (refugees only), DE, EE, FI, FR (family reunification of BIP), LT, LU, SE (also applies to beneficiaries of subsidiary protection), SI.

164 CJEU Case C-279/20, Judgment of the Court (Third Chamber) of 1 August 2022, *Bundesrepublik Deutschland v XC*, ECLI:EU:C:2022:618.

165 AT (under very specific circumstances), BE, BG, CZ, DE (under the hardship clause), EE, EL, ES, FI, FR, HR, HU (only for persons eligible for freedom of movement), IE, IT, LU, LV, NL, SI, SK, and RS.

166 CY, DE, EL, FI, FR, LT, SE.

residence permit as “other relative” if refusing to issue the residence permit would be unreasonable because the person concerned intends to resume their close family life with the sponsor in Finland, or because they are fully dependent on the sponsor. In Greece, family reunification is permitted for children up to 18 years old and, in the case of investors only, the age limit is up to 21. While family reunification can only be requested for minor children (under 18) in France, family reunification of BIP applies to the couple’s unmarried children who have not reached their 19th birthday.

Health-related dependency or disability¹⁶⁷ is the most prevalent condition for allowing adult children as part of family reunification, being present in 16 EMN Member and Observer Countries.¹⁶⁸ For example, Belgium permits family reunification for adult children with disabilities who cannot meet their own needs due to their health status.

Similarly, the Czech Republic allows it for dependent unmarried adult children who are unable to care for themselves due to a long-term adverse health condition, while Estonia grants eligibility to adult children unable to cope independently for health reasons or due to disability.

Spain permits reunification for children over 18 years with a disability requiring support. The new Aliens Regulation also permits reunification for one child over 18 when the sponsor requires support, and their adult child is the carer.

Although Sweden does not allow for family reunification with adult children, it provides for an exemption based on health grounds. Greece provides the right to family reunification with the adult unmarried children of the refugee or their spouse, if they are objectively unable to meet their needs due to their state of health.

Age limitations were reported by Ireland, where for children joining a non-European Economic Area (EEA) family, the definition of a child may occasionally be extended to 23 years where the child is in full-time education and remains dependent on the parent. The rules are different for BIPs: children must be under 18 years of age and unmarried in order to qualify for BIP family reunification. In Sweden, adult children between the ages of 18 and 21 may be granted residence permits if their parents have been granted a work permit in Sweden. Adult children above the age of 21 may also be granted residence permits provided they are being supported financially by the sponsor or their partner. In Greece, unmarried children under 18 are eligible for family reunification and, in certain cases (e.g. members of family of investors), the age limit for family reunification of unmarried children is 21.

Parents of adult children

In 14 EMN Member Countries,¹⁶⁹ parents must be **dependent** on their children to be eligible for family reunification. Finland and Luxembourg, for example, stipulate that parents must be dependent on their children and

cannot receive adequate family support in their country of origin or residence. Estonia requires parents to need care they cannot receive in their country of residence and their child in Estonia must be able to ensure their subsistence. The sponsor is also required to have a long-stay residence permit (except BIP). In Estonia, the dependant can also be a grandparent. Italy permits reunification for parents who have no other children in their country of origin and they must be financially supported by the sponsor. Lithuania requires parents to have been financially supported by the sponsor for at least one year and unable to receive support from other family members. In Greece, the parents of the refugee are eligible for family reunification, if they were accompanied and supported by that person before their arrival in Greece and lack the necessary family support in their country of origin. In Austria, parents are only eligible for family reunification if the sponsor is a minor with BIP status.

Age thresholds exist in three EMN Member Countries for parents over 65.¹⁷⁰ Czech Republic and Spain allow for family reunification for parents or ascendants over 65 years. In Spain, they must be dependent on their children and must justify the need to have a permit in Spain. There are exceptions for humanitarian reasons for those under 65. Italy allows for family reunification for parents over 65 with other children who are unable to support them due to serious health reasons.

Eight EMN Member Countries¹⁷¹ include provisions for **special or humanitarian circumstances** for family reunification with parents. The Netherlands permits family reunification based on Article 8 of the ECHR and Croatia includes special or personal humanitarian reasons. Czech Republic allows for family reunification for parents unable to care for themselves due to medical reasons or who need care unavailable in their country.

Non-married partners

Fifteen EMN Member and Observer Countries¹⁷² permit family reunification with non-married partners, while Cyprus, Czech Republic, Italy,¹⁷³ Latvia and the Slovak Republic do not recognise non-married partners for family reunification purposes. Serbia recognises common-law marriages defined as “more permanent cohabitation of a man and woman, between whom there are no marriage obstacles”.

Registered partnerships are recognised in 13 EMN Member Countries in certain cases, for example in Austria under the Settlement and Residence Act this is possible for registered partners provided they are over age 21 at the time of application.¹⁷⁴ Finland considers persons living in registered partnerships comparable to married couples (see section 4.2.5).

Eight EMN Member Countries¹⁷⁵ reported allowing partners in **stable long-term relationships** without formal registration to be considered for family reunification. Belgium

¹⁶⁷ This is an option under Article 4(2) of the Family Reunification Directive.

¹⁶⁸ BE, CZ, EE, EL, ES, HU, IT, LU, LV, NL, SE, SI, SK, and RS.

¹⁶⁹ BG, CZ, EE, EL, ES, FI, IE, IT, LT, LU, LV, PL, SE, SI, SK.

¹⁷⁰ CZ, ES, IT.

¹⁷¹ AT, BE, CZ, DE, EE, ES, HR, NL.

¹⁷² AT, BE, BG, EE, EL, ES, FI, FR (family reunification of BIP), HR, IE, LT, LU, NL, SE, SI, and RS.

¹⁷³ Italy allows for family reunification with non-married partners if there is a minor child legally residing in Italy. The sponsor in this case would be the other parent legally residing in Italy, even if the partners have no formal ties.

¹⁷⁴ AT, BE, EE, EL, ES, FI, FR (family reunification of BIP), IE, LT, LU, NL, SE, SI.

¹⁷⁵ BE, ES, FI, HR, IE, LU, NL, SE, SI.

noted that, under specific conditions,¹⁷⁶ non-married partners can submit a visa for marriage or legal partnership in Belgium (family formation). Finland does not require a minimum period of living together if the persons have a child in their joint custody or if there are other serious grounds for derogation. Ireland requires *de facto* partners to have been in a relationship akin to marriage, including cohabitation, for two years prior to the application. Spain recognises as valid a duly proven but unregistered stable relationship, defined as at least 12 months of continuous cohabitation analogous to marriage, unless the couple have children together, in which case the time requirement is waived. Slovenia includes partners with whom the sponsor is in a long-term relationship. Croatia, the Netherlands and Sweden also recognise stable long-term relationships under certain conditions, e.g. common-law partners are considered close family members in Croatia.

Same-sex partners

While Latvia, The Slovak Republic and Serbia do not recognise same-sex partnerships for family reunification, recognition of same-sex partners is provided in the remaining EMN Member Countries.¹⁷⁷ For example, Austria, Ireland, Italy and Spain recognise same-sex partners in registered partnerships as equivalent to spouses. Finland considers a person of the same gender a family member if the partnership has been registered nationally. Lithuania provides that the right to family reunification applies to same-sex couples who have entered into marriage or a registered partnership agreement. In France, same-sex partners are eligible for family reunification when they are married.

Dependent persons

Fourteen EMN Member Countries¹⁷⁸ have specific provisions for dependent persons. For example, Austria (under very specific circumstances) and Belgium allow family reunification with unmarried children over 18 and other dependent relatives (e.g. siblings, dependent adult children) in individual cases. Croatia allows for family reunification with other relatives (such as parents, in-laws, stepparents, grandparents or siblings) if there are special or personal humanitarian reasons for family reunification. In cases of temporary protection, Estonia permits family reunification with a close relative who lived with the sponsor in the country of origin and who was dependent on them. Similarly, Sweden may grant residence permits to those with whom the sponsor has a special relationship of dependency that already existed in the country of origin. Finland may issue residence permits for family reunification purposes to relatives other than family members if refusing the permit would be unreasonable because the person concerned intends to resume their close family life with the sponsor in Finland, or because the applicant is fully dependent on the sponsor. In Greece, if the refugee is an unaccompanied minor, family reunification with

the legal guardian or another member of their family is allowed if the minor has no blood relatives, or those relatives cannot be located.

Other family members

Family members other than those composing the nuclear family are reported by 16 EMN Member and Observer Countries.¹⁷⁹ Croatia allows for family reunification if there are special or personal humanitarian reasons, which may include the need for care, maintenance or fostering.¹⁸⁰ Germany allows for reunification under the hardship clause for those who fall under the regulation for family reunification (primarily the nuclear family and other family members in exceptional cases) and for parents/parents-in-law under the new regulation for highly skilled workers. Finland permits foster children if reliable evidence demonstrates that the previous custodians have died or are missing, and the sponsor or spouse was the actual foster parent before entering Finland. The Netherlands and Estonia also permit foster children. Estonia permits wards if the permanent legal income of the guardian ensures the subsistence of the ward in Estonia. Sweden permits reunification with those adopted in Sweden as adults, relatives¹⁸¹ of refugees or persons in need of subsidiary protection, and those with other special ties with Sweden. In Greece, if the refugee is an unaccompanied minor, family reunification with the legal guardian or another member of their family is allowed if the minor has no blood relatives or those relatives cannot be located. In Luxembourg, a legal guardian or any other family member of the unaccompanied minor benefitting from international protection can apply for family reunification. As well as formally adopted children can apply for family reunification, if judicial proof for the adoption can be provided. The Slovak Republic includes children under 18 placed under personal guardianship and persons entrusted with personal guardianship of unaccompanied minors. Slovenia permits reunification with family members other than the nuclear family in exceptional cases if special circumstances justify family reunification. The competent authority may deem another relative of a foreigner to be a family member if special circumstances justify family reunification in Slovenia. In the event of a polygamous marriage, a residence permit for the purpose of family reunification may only be issued or extended to one spouse.

Serbia permits reunification with other relatives who are dependent on the sponsor and not provided with adequate family care in the country of origin. In France, as part of refugees' family reunification, a BIP who is an unmarried minor may apply to be joined by their parents (direct ascendants in the first degree), and potentially by their unmarried minor siblings who are dependent on the parents.

Seven EMN Member Countries¹⁸² do not allow for family reunification of other family members in principle but

176 The couple must demonstrate that they intend to form a legal cohabitation (proof of a lasting relationship) and that the conditions for FR in the case of legal cohabitation are met. These include minimum age, sufficient resources, housing, health insurance, etc., more information available here <https://dofi.ibz.be/fr/themes/ressortis-sants-dun-pays-tiers/regroupement-familial/demande-de-visa-d-en-vue-de-se-mariier-ou>, accessed 26 August 2025.

177 AT, BE, CY, CZ, DE, EE, EL (in certain cases), ES, FI, FR, HR, HU, IE, IT, LT, LU, NL, SE, SI.

178 AT, BE, DE (only allows for family reunification for dependent persons under the general hardship clause), EE, EL, FI, HR, HU, IE, LV, NL, SE, SI, SK.

179 CZ, DE, EL, EE, ES, FI, FR (family reunification of BIP), HR, IE, IT, LU, NL, SE, SI, SK, and RS.

180 For example, family reunification may be granted to another relative (aunt, uncle) if there are no other close relatives to care for the sponsor, or vice versa if that other relative is dependent on the sponsor's care. The existence of a family relationship between a third-country national and a person residing in the Republic of Croatia, on the basis of which a request for family reunification is submitted, is proven by a birth certificate, while the existence of serious personal or humanitarian reasons is demonstrated by medical and/or other relevant documentation.

181 This may include an aunt/uncle with whom the sponsor has not shared a household, but who has had an important role in the sponsor's life.

182 AT, BE, CY, EE, FR (family reunification of BIP), LT, LV.

make some exceptions in practice. For example, in Austria, neither the Settlement and Residence Act nor the Asylum Act provides for family members other than those composing the nuclear family to be granted residence or BIP status. However, according to the case law of the Supreme Administrative Court, exceptions may be made in individual cases to avoid violating the Austrian Constitution or EU law, e.g. when a right to family reunification can be derived from Article 8 of the ECHR.

5. REQUIREMENTS FOR EXERCISING THE RIGHT TO FAMILY REUNIFICATION

This section presents an overview of the requirements and conditions for exercising the right to family reunification (Articles 6-8 of the Family Reunification Directive). This includes the possibility for EU Member States to ask that the sponsor provide evidence of: adequate accommodation, sickness insurance and stable and regular resources (section 5.1.), compliance with integration measures (section 5.2.), waiting period requirements (section 5.3.), best interests of the child and family situation (section

5.4.), more favourable provisions for family reunification of refugees (section 5.5.) and more favourable provisions for EU Blue Card holders, researchers and intra-corporate transferees (section 5.6.). This section also outlines challenges and good practices reported in relation to requirements for family reunification (section 5.7). Annex 1 provides an overview of the amounts of the minimum income requirement, by country.



5.1. ACCOMMODATION, SICKNESS INSURANCE, AND STABLE AND REGULAR RESOURCES

Article 7 of the Family Reunification Directive¹⁸³ allows EU Member States to require that the sponsor proves to have accommodation, a comprehensive sickness insurance¹⁸⁴ and/or stable and regular resources.

Suitable accommodation

Eighteen EMN Member Countries¹⁸⁵ require the sponsor to demonstrate evidence of suitable **accommodation**, while five EMN Member and Observer Countries¹⁸⁶ do not require such evidence. Ten of the EMN Member Countries¹⁸⁷ that require suitable accommodation specify in legislation or practice that the accommodation must meet certain criteria, such as compliance with hygiene/sanitary requirements,¹⁸⁸ suitability for residential use,¹⁸⁹ and size (depending on the size of the family).¹⁹⁰

Nine EMN Member Countries¹⁹¹ require the accommodation to meet hygiene and sanitary standards. Italy, for example, requires that accommodation for family reunification **meets hygiene and sanitary standards**, verified through the Certificate of Suitability for Housing issued by municipal authorities, ensuring compliance with ventilation, sanitation, and structural safety regulations. Four EMN Member Countries¹⁹² may conduct inspections to verify the health and safety of accommodations for family reunification if they suspect sub-standard housing.

These inspections are usually carried out by municipal authorities, housing agencies, or immigration offices to ensure compliance with national housing standards.

Suitability for residential use of the accommodation is a requirement in some countries.¹⁹³ This includes ensuring that the accommodation is officially designated for residential use, meaning it must be registered as a dwelling, comply with building codes, and meet national housing laws. While Italy requires municipal certification to confirm suitability, the Czech Republic and Lithuania verify compliance through property registration and building classification.

EMN Member Countries differ in their **minimum living space requirements** for family reunification, with some¹⁹⁴ setting precise square-metre thresholds per person and others providing more flexibility.¹⁹⁵ France has adopted the most detailed approach, with variations in the minimum habitable area based on geographical zones. Italy requires 14m² per person for the first four residents, reducing to 10m² for additional members. Hungary, Lithuania and Luxembourg apply per-person space requirements of 6m², 7m² and 9m², respectively. In Germany, federal guidelines suggest 12m² for every person over six years of age, 10m² for any aged under six, and suitable access to shared rooms such as kitchen

¹⁸³ Article 7(1) of the Family Reunification Directive lays down that EU Member States may require the person who has submitted the application to provide evidence that the sponsor has: accommodation suitable for the size of the family and that meets health and safety standards; sickness insurance in respect of all risks normally covered for its own nationals in the Member State concerned for himself/herself and the members of his/her family; and sufficient resources to provide for them and their family.

¹⁸⁴ Article 7 (1b) of the Family Reunification Directive: "sickness insurance in respect of all risks normally covered for its own nationals in the Member State concerned for himself/herself and the members of his/her family;"

¹⁸⁵ AT, BE, BG, CZ, CY, DE, EL, ES, FR, HR, HU, IT, LT, LU, LV (proof of intended residence), MT, SE, SK.

¹⁸⁶ FI, IE, NL, SI, and RS.

¹⁸⁷ BE, CZ, ES, FR, HU, IT, LT, LU, SE, SK.

¹⁸⁸ AT, BE, CZ, ES, FR, IT, LT, LU, SK.

¹⁸⁹ AT, BE, CZ, ES, HR, HU, IT, LT, SK.

¹⁹⁰ AT, BE (for certain regions), CZ, DE, FR, HU, IT, LT, LU, SI, SK.

¹⁹¹ AT, BE, CZ, ES, FR, IT, LT, LU, SK.

¹⁹² BE, ES, FR, IT.

¹⁹³ AT, BE, CZ, ES, HR, HU, IT, LT, LU, SK.

¹⁹⁴ DE, FR, HU, IT, LT, LU.

¹⁹⁵ AT, BE, CZ, ES, SI, SK.

and bathroom. Other countries¹⁹⁶ focus on habitability and suitability rather than enforcing strict square-metre thresholds per person. Austria, for example, requires 'one room per generation', while Slovenia and Slovak Republic allow authorities to evaluate each case individually rather than imposing fixed space requirements.

Box 2: Accommodation requirements in France

France enforces detailed accommodation requirements for family reunification, ensuring that housing is both suitable for residential use and meets strict habitability standards. The minimum space requirement is based on geographical zones, with a household of two needing at least 22m² in high-demand urban areas (Zone A) and 28m² in less populated areas (Zone C), with additional space required for each extra family member. Housing must comply with health and safety standards, including proper ventilation, sanitation, electricity, and structural integrity. To enforce these regulations, municipal authorities may conduct inspections before approving a family reunification application, ensuring that newcomers will live in adequate and dignified conditions.

Article 12 (1) of the Family Reunification Directive allows EU Member States to require refugees to meet conditions related to suitable accommodation, sickness insurance and stable and regular resources if the application for family reunification is not submitted within a period of three months of obtaining refugee status. Exemptions from the requirement to prove suitable accommodation are reported for certain categories of sponsors, e.g. refugees,¹⁹⁷ beneficiaries of subsidiary protection,¹⁹⁸ unaccompanied minors,¹⁹⁹ highly skilled workers,²⁰⁰ or holders of an EU long-term residence permit.²⁰¹

In Estonia, applicants must provide information on their registered place of residence, but proof that the living space meets health and safety standards is not required. Ireland generally does not require suitable accommodation, except for sponsors applying for older dependent relatives and applicants under the Afghan Admission Programme.

Sickness insurance

Twenty-one EMN Member and Observer Countries²⁰² require proof of **sickness insurance** for the sponsor and their family member(s) for all risks normally

covered for their own nationals. Finland, France and Sweden do not set any such requirement. Exceptions apply, such as for refugees,²⁰³ unaccompanied minors,²⁰⁴ all²⁰⁵ or certain categories of workers, such as highly skilled workers,²⁰⁶ and EU long-term residents.²⁰⁷

Exemptions from the sickness insurance requirement for refugees,²⁰⁸ and beneficiaries of subsidiary protection²⁰⁹ apply in some countries, provided that the family reunification application is submitted within a specific time-frame, ranging from 90 days in Slovenia, three months in Austria, Germany and Greece, six months in Lithuania and Luxembourg, to 12 months in Belgium and Ireland. France, Latvia, Spain and the Slovak Republic fully waive the requirement for all BIP, regardless of timing.²¹⁰

In Italy, the applicant must prove health insurance or registration with the National Health Service only for reunification with parents over 65 years old. In Hungary, the applicant must have either full healthcare coverage or proof of sufficient financial means to cover healthcare costs.

Belgium and Slovenia²¹¹ provide discretionary exemptions from the sickness insurance requirement for vulnerable individuals, older dependents, or those facing humanitarian difficulties. These exemptions are usually considered on a case-by-case basis, allowing authorities to assess individual situations and apply humanitarian discretion where appropriate. In Ireland, a greater level of cover is required for older dependent relatives.

Stable and regular resources

All EMN Member Countries require proof of **stable and regular financial resources** sufficient to maintain the applicant and their family members without becoming a burden on the state's welfare system. However, the specific income thresholds, calculation methods, and reference periods for assessing financial stability vary significantly between countries. Annex 1 presents the amounts of the minimum income requirement, by country.

In 12 EMN Member Countries,²¹² the minimum amount of fixed and regular income required to meet the self-sufficiency criterion is based on the reference rates of the minimum national wage or minimum subsistence level provided by specific national legislation. Germany, Italy and Poland link income requirements to social welfare benchmarks, requiring applicants to earn at least the equivalent of the social assistance allowance.

196 FR, HU, IT.

197 AT, BE, CY, DE (if request for family reunification is filed within three months of being granted protection), EL, ES, FR, HR, IT, LT, LU, LV, SI, SK.

198 BE, DE (if request for family reunification is filed within three months of being granted protection), ES, FR, HR, IT, LT, LU, LV, SK. In the Czech Republic, there are no exemptions for beneficiaries of subsidiary protection. In the Slovak Republic, exemptions from the requirement to prove suitable accommodation apply only when family reunification is requested under subsidiary protection. These exemptions do not apply in cases where the application is for temporary residence for the purpose of family reunification.

199 AT, BE, CY, DE, EL, ES, FI, FR, LT, LU, LV, SI, SK.

200 BE.

201 BE.

202 AT, BE, BG, CY, CZ, DE, EE, EL, ES, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SI, SK, and RS. In Malta, comprehensive health insurance is required for all new applications and for renewals of the Family Member Policy. Applicants through the Family Reunification Regulations (EU Directive) route and the Family Unity (family members of those holding protection status) do not require insurance.

203 AT, BE, CY, DE, EL, ES, HR, IE, LT, LU, LV, NL, SI, SK, and RS.

204 AT, BE, DE, LV, LU, SI, and RS.

205 RS.

206 BE, DE.

207 BE.

208 AT, BE, EL, ES, HR, IE, LU, PL, SI, SK, and RS.

209 BE, FR, HR, IE, IT, LT, LU, PL, SK, and RS. In the Slovak Republic, exemptions from the requirement of sickness insurance apply only when family reunification is requested under subsidiary protection. These exemptions do not apply in cases where the application is for temporary residence for the purpose of family reunification.

210 For precision: the shortest and longest combination of days varies based on month's length. Shortest: February (28 days) + March (31) + April (30) = 89 days. Longest: July (31) + August (31) + September (30) = 92 days.

211 BE, SI.

212 BE, BG, EE, EL, FI, FR, IT, LT, LU, LV, MT, NL, SI, SK.

Specific income thresholds for family reunification vary widely, with some countries²¹³ setting a fixed minimum amount, while others²¹⁴ apply a tiered system that increases with each additional family member. In France, for example, the minimum required income must be at least equal to the gross national minimum wage for a family of two, increasing by 10% for families of four or five, and by 20% for six or more family members. Similarly, in Slovenia, the basic minimum income requirement is € 484.88 per adult, calculated using the social assistance threshold, with specific adjustments for family size (see Annex 3 for more details). In Germany, the income threshold for family reunification is based on the principle of household sharing, meaning the household must have sufficient income to ensure that no member qualifies for social welfare benefits. The required amount varies depending on factors such as household size and age of children.

The reference period for calculating stable and regular resources also varies, ranging from three months prior to the date of submitting the application in Sweden, 12 months in Luxembourg, to up to three years in Ireland, depending on the category of the sponsor (see Annex 3). In Belgium, a sponsor must provide documentation of stable and regular income, ideally covering the 12 months before the application, which may be longer if self-employed. Different periods are set in the Netherlands for different types of residence permits or employment contracts. In Czech Republic, the reference period for income verification also depends on the type of income. If the sponsor or the family member is employed, they must provide proof of income for the past three months. If the sponsor or a family member is an entrepreneur, proof of income for the previous year is required.

In some countries,²¹⁵ the maintenance requirement can be assessed **prospectively** in some cases, meaning that the sponsor's ability to support themselves and their family member in the future is considered (see Box 3). Germany employs a forward-looking assessment, using datapoints from past employment history, potential future employment, and future pensions when applicants are about to retire from work. In Bulgaria, future income is proved by presenting an employment contract or an official certificate from an employer stating that the holder has an employment contract, the period of that contract, and the amount of remuneration. In Luxembourg, the sponsor's ability to maintain stable, regular and sufficient resources is assessed based on a prognosis for the year following the application, with income from the preceding six months considered, in line with CJEU judgment C-558/14.²¹⁶ In Slovenia, if a sponsor eligible for immediate family reunification applies for both their own permit (e.g. EU Blue Card) and their family's permits at the same time, the salary in their job contract will be considered when issuing the family permits. The Slovak Republic allows financial security to be demonstrated based on

either past income or future income of the sponsor, whereby financial security must be demonstrated for each month of residence. If the intended stay exceeds one year, the required financial resources must cover 12 times the minimum subsistence level.

Box 3: Assessment of sufficient resource in Austria

In **Austria**, authorities conduct a forward-looking assessment of the sponsor's resources, predicting whether the applicant will be able to sustain themselves throughout the duration of their residence permit. This means that future income, such as an upcoming job contract, must be taken into account if there is a reasonable prospect of employment. Additionally, Austria considers not only the sponsor's income but also their regular expenses (e.g. rent, loan repayments), ensuring a more nuanced approach that reflects their real financial situation.

Exemptions from the requirement of stable and regular resources apply for certain categories, such as refugees,²¹⁷ beneficiaries of subsidiary protection,²¹⁸ unaccompanied minors,²¹⁹ highly skilled workers²²⁰ and EU long-term residents.²²¹ In Austria, Finland and Sweden, only family members of sponsors with refugee status are exempt from this requirement, while beneficiaries of subsidiary protection must meet the stable and regular income requirement. Refugees and (where applicable beneficiaries of subsidiary protection) are exempt from proving stable and regular financial resources in most EMN Member Countries, particularly if they apply for family reunification within a specified timeframe. For example, Austria, Germany and Finland (for sponsors with refugee status only), and Slovenia set a 90-day limit, while Lithuania and Luxembourg extend this period to six months, and Belgium and Ireland to 12 months. Failure to apply within these windows may result in the financial requirement being imposed, except in cases where humanitarian considerations apply, such as in France and Spain, which grant full exemptions regardless of timing.

Exemptions from proving stable and regular financial resources for older and vulnerable persons apply in some countries.²²² In Spain, for example, the required amount for family reunification may be lowered if there are valid reasons, in line with the best interests of the child. This includes consideration of factors such as the family member's age, emotional and physical development, relationship with the sponsor, and family size. The goal is to prioritise family life while ensuring that other legal and regulatory requirements are met. In the Netherlands, certain individuals, such as those receiving old-age pensions, those fully disabled, or those with a humanitarian residence permit, may be exempt from the income requirements.

213 BE, ES, IT, LT, LV, PL, SI.

214 DE, FI, FR, IE, LT.

215 AT, BG, DE, FI, IE (in some cases), LU, SE, SK.

216 CJEU Case C-558/14, Judgment of 21 April 2016, *Mimoun Khachab v Subdelegación del Gobierno en Álava*, ECLI:EU:C:2016:285.

217 AT, BE, BG, CY, DE (if request filed within three months of obtaining protection), EE, EL, ES, FI, FR, HR, IE, IT, LT, LU, LV, MT, NL (if request filed within three months of obtaining protection), PL, SE, SI (if request filed within 90 days of obtaining protection), SK and RS.

218 BE, BG, DE (if request filed within three months of obtaining protection), EE, ES, FR, HR, IE, IT, LT, LU, LV, MT, NL (if request filed within 90 days of obtaining protection), PL, SI, SK and RS. In Finland, beneficiaries of subsidiary protection are not exempt from the requirement of stable and regular resources. In the Slovak Republic, exemptions from the requirement of stable and regular resources apply only when family reunification is requested under subsidiary protection. These exemptions do not apply in cases where the application is for temporary residence for the purpose of family reunification.

219 AT, BE, DE, FR, LT, LV, SI.

220 BE, DE, IE.

221 BE, SI.

222 ES, FR, NL.

If the requirements for stable income are not met, in most cases the person is denied the right to family reunification. Seven countries²²³ reported that having income below the reference amount does not automatically lead to a rejection of the application for family reunification. Germany, for example, allows for exemptions if atypical exceptional circumstances are presented. Instead, authorities assess the applicant's overall financial situation, considering factors such as future employment prospects, additional sources of income, or financial support from family members. Case-by-case assessment allows for flexibility,

particularly when there is evidence that the sponsor is making reasonable efforts to maintain financial stability, or when humanitarian considerations apply.

In 14 EMN Member and Observer Countries,²²⁴ the resources of the family members are also considered, while four EMN Member Countries²²⁵ reported that only the sponsor's income is considered. In the Netherlands, the potential resources of family members are only considered when renewing a residence permit for family reunification.



5.2. REQUIREMENTS FOR INTEGRATION MEASURES

Seven EMN Member and Observer Countries²²⁶ require family members applying for family reunification to comply with **integration measures**, which include civic integration and language proficiency requirements. Sixteen countries²²⁷ have no such requirement. In Belgium, Estonia, Italy and Slovenia, the requirement to comply with integration measures applies after the family members have received a residence permit and not in the application stage.

The requirement for **civic integration** varies across the six EMN Member and Observer Countries,²²⁸ with some requiring pre-arrival exams,²²⁹ while others focus on post-arrival assessments²³⁰ as a condition for residence permits. In the Netherlands, for example, family members are required to comply with integration measures both before and after admission, with some exemptions for specific nationalities.²³¹ They must pass the Basic Civic Integration exam abroad to obtain a long-stay visa. After arrival, they may need to take a civic integration course, which must be completed within three years. The courses vary depending on the person's goals, such as employment or education. In Italy, family members applying for reunification must sign (and comply with) an integration agreement (so-called residence contract) within eight days of arrival in the country. In Spain, integration measures are required only for the renewal of a residence permit.

Three EMN Member Countries²³² set **language proficiency requirements** for family reunification applicants, with some enforcing language tests before arrival,²³³ others assessing proficiency after entry,²³⁴ and some incorporating language learning into broader integration measures.²³⁵ Austria,²³⁶ Germany²³⁷ and the Netherlands require pre-arrival language proficiency at A1 level. In the Netherlands, migrants must take language tests after their arrival, with required proficiency levels ranging from A2 to B2, depending on their integration pathway. By contrast, France, Italy and Slovenia impose post-arrival language requirements, with France requiring A2-level proficiency, assessed after

the mandatory language training for a multi-year permit, and B1 for a 10-year permit, Italy mandating A2 proficiency through an integration agreement, and Slovenia requiring a language test for residence permit renewal. Estonia takes a flexible approach to legal migration by offering voluntary language courses without mandatory exams; however, for BIP, mandatory language courses are provided for at least two years after the status is granted, and the beneficiary must achieve at least A2 level within two years and B1 level within five years.

Box 4: Integration requirements in Austria

In Austria, reunited family members under the Settlement and Residence Act must meet integration requirements **after** receiving a specific temporary residence permit. They must complete Module 1 of the Integration Agreement, which includes a German language proficiency at A2 level and knowledge of Austria's legal and social order. They have two years from the initial date of issue of the residence permit to complete the module. If they lack secondary education qualifications, they must take an integration exam.

Applicants must prove German proficiency at A1 level before entering Austria. Persons exempt from providing proof of German language proficiency prior to entering the country are minors under the age of 14, family members of holders of certain residence permits, family members of persons granted asylum, and family members with a temporary residence permit. Authorities may also waive language requirements to protect family life or a child's best interests.

Failure to complete integration requirements within two years can result in fines, and, in the event of default, imprisonment of up to two weeks if the fine cannot be recovered, or a return decision. Non-compliance also affects access to social assistance, with a reduction in benefits.

223 AT, BE, DE, EE, FI, FR, IE, LU.

224 AT, BE, BG, DE, EE, EL, ES, FI, HR, HU, IE (in some cases), LT, LU, LV, and RS.

225 CZ, EL, IT, SK.

226 AT, DE, ES, FR, IT, NL, SI.

227 BE, BG, CY, EE, EL, FI, HR, HU, IE, LT, LU, LV, MT, PL, SE, SK, and RS.

228 AT, ES, FR, IT, NL, SI.

229 NL.

230 AT, ES, FR, IT, SI.

231 EU/European Free Trade Association (EFTA) countries, Switzerland, United Kingdom (UK), United States (US), Canada, Australia, New Zealand, Vatican City, Monaco, Japan and South Korea are exempt.

232 AT, EE, FR, IT, NL, SI.

233 AT (only for family reunification under the Settlement and Residence Act), DE, NL.

234 FR, IT, SI.

235 EE, IT, LU, NL.

236 Family reunification under the Settlement and Residence Act.

237 Waived for certain groups.



5.3. WAITING PERIOD REQUIREMENT

Article 8 of the Family Reunification Directive allows EU Member States to require sponsors to have stayed lawfully on the territory for a period not exceeding two years (or three years by derogation in specific circumstances) before their family members can join them. This waiting period does not apply to cases where the sponsor is a refugee.

Fourteen EMN Member Countries²³⁸ have set a waiting period requirement, while seven²³⁹ have not. The period is set at one year in Belgium, Croatia, Luxembourg, the Netherlands, Malta,²⁴⁰ Slovenia and Spain, 15 months in the Czech Republic, 18 months in France (no waiting period for BIP), and two years in Estonia,²⁴¹ Lithuania,²⁴² Greece and Poland. In Luxembourg and the Netherlands, the waiting period does not apply for BIP or EU Blue Card holders or researchers, or for intra-corporate transferees in Luxembourg. Similarly, Greece does not set a waiting period for refugees (as beneficiaries of subsidiary protection do not have the right to family reunification in Greece). In Austria and Latvia, waiting periods of three years and two years, respectively, are only applied in respect of beneficiaries of subsidiary protection.

Finland did not previously have a waiting period in legislation, but in 2024 the Finnish government proposed a new law requiring a two-year waiting period for BIP and beneficiaries of subsidiary protection before their family members can join them. As of 16 June 2025, the rule applies to sponsors with subsidiary protection, and only to new family members of sponsors with refugee status. Exceptions to this waiting period may be made in specific cases, such as serious grounds or the best interest of a child.

Six EMN Member Countries²⁴³ have requirements in their national law to incorporate consideration of the reasonable prospect of obtaining permanent residence, as laid down in Article 3(1) of the Family Reunification Directive. Thirteen countries²⁴⁴ do not. Cyprus grants temporary permits only. In Sweden, for example, in cases where the sponsor holds a temporary residence permit, they must have well-founded prospects of being granted a longer residence permit, typically as a refugee or someone in need of subsidiary protection. In Spain, the sponsor must have resided in the country for at least one year and must have applied for a residence permit—whether a renewal or amendment—that is valid for at least one additional year.



5.4. BEST INTEREST OF THE CHILD AND FAMILY SITUATION

The Family Reunification Directive (Article 5(5) and Article 17) stipulates that, when examining an application, EU Member States shall have due regard to the best interest of the child and preserving the right to family life.

Fifteen EMN Member and Observer Countries²⁴⁵ provided information about the specific provisions in the national legislation. Six EMN Member and Observer Countries²⁴⁶ also referred to the ECHR or the Convention on the Rights of the Child.²⁴⁷

EMN Member and Observer Countries take different approaches to assessing individual circumstances and the best interests of the child when family reunification requirements are not fully met. Some²⁴⁸ conduct a proportionality test or legal assessment to ensure that rejecting an application does not disproportionately affect family life. These countries allow for exemptions in cases where refusal would violate Article 8 of the ECHR or cause serious harm to the child's well-being. Finland and Sweden

have explicit legal provisions allowing flexibility in financial and accommodation requirements if denying the application would be against the best interests of the child.

Other EMN Member Countries²⁴⁹ focus on evaluating family ties, duration of residence, and social integration when deciding on exceptions. Estonia ensures that residence permits for children are not refused if this would harm their rights and interests, while Slovenia takes into account the closeness of the family relationship and cultural and social ties to the home country.

238 BE, CZ, EE, EL, ES, FR, HR, IE (some sponsor categories), IT, LT, LU, MT, NL, SI.

239 AT, BG, CY, FI, HU, LV, SE, SK.

240 In Malta, the sponsor must generally reside in the country for at least one year if applying under the national Family Members Unification Policy, or two years under subsidiary legislation, while no residence period is required for EU Blue Card holders or high net worth individuals.

241 In Estonia, this only applies when applying for a temporary residence permit to settle with the spouse or registered partner who is an alien who has been granted a temporary residence permit for studies (except for Master studies). However, for family reunification with parents and grandparents, the sponsor is required to have a long-stay residence permit, which means the waiting period is five years. All other cases do not have a waiting period requirement.

242 Where the condition on immediately acquiring the right to family reunification does not apply.

243 EE, ES, FR, LT, LU, SE.

244 BE, CY, EL, FI, HR, HU, IE, IT, LV, SI, SK, and NO, RS.

245 BE, CY, EE, EL, ES, FI, FR, IT, LT, LU, NL, SE, SI, SK, and RS.

246 AT, FI, NL, SE.

247 FI, FR, IT.

248 AT, DE, FI, FR, NL, SE.

249 EE, EL, HR, LT, MT, PL, SI.



5.5. MORE FAVOURABLE PROVISIONS FOR FAMILY REUNIFICATION OF REFUGEES

Chapter V of the Family Reunification Directive applies to family reunification of refugees recognised by EU Member States, establishing more favourable rules for refugees seeking to reunite with their families. Article 12(1) of the Family Reunification Directive requires Member States to introduce a 'grace' period of three months after the sponsor is granted protection if they opt to apply the conditions referred to in Article 7(1), which means that if the sponsor applies for family reunification within this period, then the requirements linked to adequate standards of accommodation, sickness insurance, and/or regular and sufficient financial resources set out in Article 7(1) are waived.²⁵⁰

EMN Member Countries apply the grace period for family reunification of refugees. The grace period of (minimum) three months before the requirements for exercising the right to family reunification is applied in 14 EMN Member Countries,²⁵¹ and may be further extended in eight countries:²⁵² in Belgium and Ireland to 12 months, and in Estonia, Lithuania, Luxembourg and Poland to six months. In France and Italy, refugees and beneficiaries of subsidiary protection are not required to meet accommodation and income requirements and may apply for family reunification under these favourable conditions at any time, not only within the initial three months.

In Latvia, BIP and their family members are not subject to any requirements regarding residence, financial resources, or health insurance. Although the Netherlands applies the minimum grace period of three months set by the Directive, the question of whether exceeding such grace period for the application can be waived is assessed on a case-by-case basis. Although Ireland is not bound by the Family Reunification Directive, its family reunification rules for BIP are more favourable, provided the application is submitted within 12 months, as no financial requirements are imposed. After 12 months, BIP may still apply for family reunification, but they must meet the criteria and conditions outlined in the non-EEA policy document.

The Family Reunification Directive allows EU Member States to apply more favourable family reunification rules for refugees only to relationships established before the sponsor's entry into the country.²⁵³ Fourteen EMN Member Countries²⁵⁴ have imposed this restriction, while 10 EMN Member and Observer Countries²⁵⁵ have not. For unaccompanied minors, 14 EMN Member Countries²⁵⁶ apply a wider definition of family members beyond parents, while seven EMN Member and Observer Countries²⁵⁷ do not. Finland, for example, allows for reunification with foster parents in specific cases.



5.6. MORE FAVOURABLE PROVISIONS FOR EU BLUE CARD HOLDERS, RESEARCHERS AND INTRA-CORPORATE TRANSFEREES

Many EU Member States offer favourable conditions for family reunification of EU Blue Card holders,²⁵⁸ researchers,²⁵⁹ and intra-corporate transferees²⁶⁰ beyond those already legally established in the respective directives. These vary in scope and scale, however.

Under the respective directives, applications for family reunification with EU blue card holders, researchers and intra-corporate transferees must be processed within 90 days from the submission of a complete application. Some countries²⁶¹ provide **expedited processing times** for such family reunification applications. In Belgium, for example, processing times can be reduced to as little as one to two weeks if all required documents are submitted correctly, allowing family members to join the main applicant more quickly. In Finland, the Finnish Immigration Service must issue a decision on the EU Blue Card application and the family member's application no later than 60 days from the date of lodging a complete application. If

the employer is certified, the decision on the EU Blue Card application must be issued within 30 days. In Lithuania, applications for EU Blue Card, ICT, start-ups, lecturers, researchers, and their family members are processed within one month under the standard procedure and within 15 days under the urgent procedure. In Latvia, EU Blue Card family members' cases are examined within a shortened time limit of 10 working days.

Seventeen EMN Member Countries²⁶² allow applications to be submitted immediately, with **no waiting period**. Finland and France, for example, offer a simplified process under the 'accompanying family' procedure, enabling family members to travel with the sponsor applicant without undergoing the standard family reunification procedure. Germany allows the sponsor to apply for family reunification while still residing in their country of origin, allowing the sponsor and their family to move to Germany at the same time.

250 For more details on family reunification for refugees, see European Migration Network (EMN), Family reunification for BIP - EMN inform, 2024, https://home-affairs.ec.europa.eu/document/download/80b77bb4-3184-427e-8e5e-a31ccc5540d5_en?filename=2024_EMN_inform_family_reunification.pdf, accessed 28 February 2025.

251 AT, BE, CZ, CY, DE, EE, EL, FI, HR, NL, SE, SI, SK.

252 BE, CY, EE, FI, HR, IE, LU, LV.

253 Article 9(2) Family Reunification Directive.

254 AT, BE, CY, DE, EE, FI, FR, IE, LU, LV, NL, SE, SI, SK.

255 BG, CZ, EL, ES, HR, HU, IT, LT, and RS.

256 BG, CY, CZ, EE, EL, FI, FR, HR, IE, LT, LU, LV, PL, SI, SK.

257 AT, BE, DE, ES, IT, NL, SE.

258 AT, BE, CZ, DE, EE, EL, ES, FR, HR, IT, LT, LU, LV, MT, NL, PL, SI, SK.

259 AT, BE, CY, CZ, DE, EE, EL, ES, FI, FR, HR, IT, LT, LU, MT, NL, SI, SK.

260 BE, CY, CZ, DE, EE, EL, ES, FR, HR, IT, LT, LU, MT, NL, SI, SK.

261 BE, FI, LT, LV.

262 CZ, DE, EE, EL, ES, FI, FR, HR, IE (in some cases), IT, LT, LU, LV, PL, SI, SK and RS.

Other more favourable conditions relate to accommodation and integration and language requirements for EU Blue Card holders, researchers and intra-corporate transferees. Three EMN Member Countries²⁶³ allow employer-provided housing or temporary accommodation arrangements as valid proof of suitable accommodation. Austria and the Netherlands explicitly exempt these groups from integration and language requirements.

Permit duration and conditions differ, with Finland, France, Germany, Greece, and Slovenia all granting family members permits with the same period of validity as the sponsor. Germany exempts these sponsors both from proof of housing and pre-integration requirements and from the requirement to provide proof of sufficient income to sustain their family members.



5.7. CHALLENGES AND GOOD PRACTICES

Challenges

Thirteen EMN Member and Observer Countries²⁶⁴ reported several common challenges in respect of family reunification. These challenges are mostly related to proof of suitable accommodation,²⁶⁵ sickness insurance,²⁶⁶ sufficient financial resources,²⁶⁷ and integration requirements.²⁶⁸

Suitable accommodation requirements are identified as a challenge in Austria and Belgium. In Austria and parts of Germany, access to accommodation has become more difficult in recent years due to rising rents. Similarly, in Belgium, many sponsors have difficulty finding suitable accommodation at an affordable rent. These difficulties are exacerbated by the lack of support services to help families to find accommodation. In addition, this condition must be met when the application is submitted, forcing sponsors to pay high rents for many months while family members have not yet arrived in Belgium.

In Austria, providing evidence of **sickness insurance** may be a challenge in cases where co-insurance is not a viable option. The cost of private health insurance is relatively high, and it can be difficult to find private health insurance providers, especially for older people.

Constraints related to **proof of sufficient resources** are a major barrier in countries²⁶⁹ where high income thresholds and rising housing costs make it difficult for sponsors to meet the required financial criteria. Belgium noted that the amount required by the authorities is particularly high given inflation, sponsors are unable to count the income of the family member, and not all types of income are taken into consideration. Similarly, in Ireland, the financial thresholds are reported as a challenge, with NGOs highlighting that the different rates and rules that apply can cause confusion.

In the Slovak Republic, providing proof of financial security through a bank statement can be challenging, especially for larger families, as the required amount is often significant and difficult to demonstrate.

Integration requirements pose challenges in Austria, Italy and the Netherlands, where pre-entry language and integration requirements act as significant barriers. In Austria, mandatory German language proficiency before arrival disproportionately affects women from countries

with limited (if any) language courses. Similarly, the Netherlands imposes civic integration exams abroad in some cases, which must be passed before family reunification can proceed, creating additional obstacles for applicants.

For refugees, the **deadline for family members** to apply for family reunification has been perceived as a challenge in several countries.²⁷⁰ In Austria, for example, asylum seekers often struggle to re-establish contact with family members due to conflict or persecution and missing the deadline results in additional financial and bureaucratic hurdles. In Ireland, the 12-month deadline is associated with challenges such as difficulties in contacting family members, lack of formal support, stringent documentation requirements, and the high cost of the process, further complicated by the time limit for families to travel once permission is granted. In Luxembourg, some national partners have reported challenges with the administrative practice for certain countries (e.g. Eritrea, Guinea, Senegal, Uganda), where the use of an external private company complicates the process of establishing family links for reunification. Although the application is lodged with the General Department of Immigration, processing does not begin until the family files a visa request through a complex online system, often leading to long delays—especially burdensome for Eritrean families who must travel abroad and wait over 18 months for a decision.

Austria and Ireland reported that unaccompanied minors who turn 18 during the waiting period often lose eligibility for reunification, preventing their parents from joining them, although in Ireland the Minister of Justice does often exercise discretion in these cases. In Austria, extended waiting periods for subsidiary protection holders result in prolonged family separation, with children ageing out of eligibility before their applications are processed. In Germany, the current solution for beneficiaries of subsidiary protection leads to long waiting times, partly due to extensive documentation requirements and partly because families must be selected based on humanitarian need.

Some countries²⁷¹ reported challenges for national authorities, primarily related to difficulties with documentation. In Sweden, for example, for the Swedish Migration Agency examination of the maintenance and sufficient resources requirement takes significant time, as many sponsors have temporary employment and unclear living conditions. This means that the Swedish Migration Agency has

²⁶³ BE, EE, FR.

²⁶⁴ AT, BE, BG, EL, FR, HR, IE, IT, LT, LU, NL, PL, SK, and RS.

²⁶⁵ AT, BE, LU.

²⁶⁶ AT.

²⁶⁷ AT, BE, FI, FR, IE, LU, SK.

²⁶⁸ AT, IT, NL.

²⁶⁹ AT, BE, FI, IE, LU, SK.

²⁷⁰ AT, FI, IE, LU, LT.

²⁷¹ AT, EL, FI, FR, HR, IE, IT, LU, LV, MT, SE, SK.

to supplement a very large number of cases with more information from the sponsors. Similarly, in Austria, family reunification authorities face challenges when sponsors change employment or accommodation during the application process, requiring re-evaluations of housing conditions and potential transfers between local authorities. In France, the authorities face challenges in verifying family ties for refugee family reunification due to the frequent lack of reliable documents or civil registries in the countries of origin, requiring careful assessment of alternative evidence such as photos and ‘possession of status’, while maintaining strict anti-fraud standards.

Good practices

Austria, Ireland, Italy and the Slovak Republic reported good practices concerning the requirements for family reunification. In the Slovak Republic, it is possible to submit the sponsor’s residence permit application, and the family reunification residence permit’s application at the same time.

In Austria, in regard to requirement to proof health insurance, a list of insurance providers has been compiled whose insurance cover has been checked and deemed adequate. While it is possible to choose alternative insurance, this necessitates a review of the documentation (policy, insurance conditions) by the authorities to assess whether all risks are covered.

Ireland’s non-EEA policy document enables discretion within decision-making on family reunification. This allows decision makers the ability to grant family reunification in some rare or exceptional cases, even if standard requirements are not met. Italy facilitates access and priority processing of family reunification applications submitted by BIP by simplifying bureaucratic administrative aspects, particularly for vulnerable profiles.

Regarding the best interest of the child, Italy introduced a regulation and a law to help to find the family members of unaccompanied foreign minors, whether in their home countries, other EU countries, or elsewhere. Accordingly, the Ministry of Labour and Social Policies can work with international and humanitarian organisations to collect information on the minor’s family and social ties and assess the possibility of family reunification. In Finland, the realisation of children’s rights was improved by a legislative amendment that entered into force in 2023 and eliminated the requirement for sufficient financial resources for the family members of a sponsor who is a minor and a BIP. Also, the possibility to submit individual complaints to the UN Committee on the Rights of the Child has been a good practice.

On integration measures, Italy offers local services through municipalities to support family reunification, including help with applications, counselling, language courses, cultural mediation, and personalised support for newly arrived family members. It has also funded pre-departure guidance and language training for third-country nationals through the Asylum and Migration Integration Fund (AMIF).

Box 5: Family reunification support procedure in Austria

In Austria, in order to comply with the three-month deadline for more favourable requirements for family reunification for refugees, the Austrian Red Cross has adapted its family reunification support procedure. The required documents are submitted via email, a power of attorney is issued, and the Austrian Red Cross then submits the written application for an entry permit for the purpose of applying for international protection to the representation authority abroad. The three-month deadline is deemed to have been met with the submission of this written application.

6. APPLICATION FOR FAMILY REUNIFICATION

This section presents the process for submitting and examining an application for family reunification in the host country or abroad, as per Chapter III of the Family Reunification Directive. It includes information on the

family reunification procedure (section 6.1.), the application procedure (section 6.2.) and the documentation required from the applicant (section 6.3.). Challenges and good practices are presented in section 6.4.



6.1. INFORMATION ON FAMILY REUNIFICATION PROCEDURE

EMN Member and Observer Countries use various channels to communicate information on the family reunification procedure, including websites,²⁷² telephone,²⁷³ email,²⁷⁴ booklets²⁷⁵ or in-person at advice centres.²⁷⁶

All EMN Member and Observer Countries reported providing information on the family reunification procedure on the websites of national migration authorities (e.g. Ministries of the Interior, migration agencies). In several countries, the websites of other institutions or organisations also provide relevant information, such as diplomatic and consular missions,²⁷⁷ municipalities,²⁷⁸ NGOs,²⁷⁹ and international organisations such as IOM²⁸⁰ and the United Nations High Commissioner for Refugees (UNHCR).²⁸¹ Special immigration portals for third-country nationals provide tailored information in some countries.²⁸²

Information is typically available in multiple languages.²⁸³ In Finland, the website of the Finnish Immigration Service includes separate pages for family members and sponsors, as well as a webinar on applying for a residence permit on the basis of family ties, subtitled in Finnish, English, Swedish, Arabic, Russian and Somali. Austria reported that it can be difficult for family members in the country of origin to access information, as this is often only available in German or only partially in English.

In Austria, advice centres, such as the Counselling Centre for Migrants in Vienna, provide tailored information. In The Slovak Republic, from early 2025, the Ministry of the Interior plans to establish three fully functional one-stop-shop

centres to provide services to facilitate the settlement of foreign nationals.

In some cases,²⁸⁴ tailored information is provided if the sponsor is a beneficiary of international protection. In Estonia, all BIPs receive a booklet informing them of their rights, including family reunification. Similarly, in Greece, the information on family reunification is provided only to refugees. Similarly, in France, the French Office for the Protection of Refugees and Stateless Persons (OFPRA) and the General Directorate for Foreigners in France (DGEF) have published an online information brochure in six languages (French, English, Arabic, Pashto, Dari, Tigrinya).²⁸⁵

In France, tailored information is provided to employees of foreign companies. The [Welcome to France](#) website, created by Business France, provides information for family members of foreign talent who come to reside in France. Germany's principal website²⁸⁶ for labour migration also contains a multilingual section on family reunification. Further information can be obtained from a contact email and hotline.

Box 6: Accessing information on family reunification procedures²⁸⁷

International organisations that participated to the study identified several challenges in applicants' access to information on family reunification often due to the lack of clear, up-to-date and reliable information. National authorities and the embassy or

272 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, SE, SI, SK, and RS.

273 AT, CZ, EE, LT, LV, PL, SE, SK.

274 CZ, EE, LT, LV, SE, SK.

275 DE, EE, EL, FR, IE, SK.

276 AT, DE, EE, FI, LT, LV, MT, SK.

277 BE, DE, FI, IT.

278 AT, BE, DE, EE, ES, FI, IT, SK.

279 AT, DE, EE, ES, FI, IE, IT, LT, LV, SK.

280 DE, EE, IE, LT, SK.

281 BE, EE, ES, IE, LT, LV.

282 CZ, DE, EL, FR, IT, LV, SI and RS.

283 BE, CZ, DE, EE, EL, FI, FR, IT, LT, LU, LV, NL, SE, SK, and RS.

284 AT, EE, EL, FR.

285 French Ministry of the Interior, 'The stay of the family members of refugees, beneficiaries of subsidiary protection, and stateless persons', 2021, <https://www.immigration.interieur.gouv.fr/Immigration/L-immigration-familiale/Le-sejour-de-la-famille-des-refugies-des-protectes-subsidiaries-et-des-apatrides>, accessed 24 April 2025.

286 The Federal Government, Family reunification, <https://www.make-it-in-germany.com/en/visa-residence/family-reunification>, accessed 3 July 2025.

287 This box presents an analysis of the inputs gathered via a questionnaire submitted to IOM, UNHCR and Red Cross EU Office, as explained in the disclaimer of this study.

consular services of several EMN Member and Observer Countries do not have any official information available for applicants, or the information provided is not available in the languages often spoken by third-country nationals. The Red Cross EU Office highlighted that, where information is available, it is often difficult to understand, incomplete or outdated, notably when provided by national authority or embassy websites. The IOM noted that low literacy levels, limited internet access and/or technological proficiency, incomplete understanding of rights and procedures, and delayed communication with applicants hinder their full understanding of the family reunification procedures.

It can be challenging for applicants to understand the requisite documentation and varied eligibility criteria, even when the information is adapted and published on public websites, according to the UNHCR and the Red Cross EU Office. Dedicated services that can provide guidance to applicants on these procedures are often missing within central migration agencies or administrations, resulting in a lack of consistency.

As a result, alternative actors provide support to applicants, including organisations working in reception, accommodation and integration, and other civil society organisations. As emphasised by the Red Cross EU Office, the importance of the support provided by civil society, international, and humanitarian organisations in accessing the family reunification process is foremost. For example, these organisations can directly present cases to Consular Offices and Embassies, maintain regular communication regarding case follow-ups, and discuss potential solutions. Such support is especially crucial in cases of a negative decision. This approach also benefits the quality of the application, leading to more efficient processing.

Finally, the IOM flagged that challenges in accessing information have led to a tendency to rely on informal channels, such as word-of-mouth or social media groups, leading to the widespread dissemination of misinformation.

The IOM, UNHCR and Red Cross EU Office reported a number of good practices implemented across EMN Member and Observer Countries²⁸⁸ to facilitate the provision of information on family reunification. These include counselling and assistance, developing online platforms, videos and other digital communication activities to provide information, leaflets, and communities of practice.

The AMIF-funded Reunification Pathways for Integration (REPAIR) project (2022–2025), led by the International Federation of Red Cross and Red Crescent Societies (IFRC) and implemented by the Austrian, French, British and Slovenian Red Cross, identified areas of intervention by conducting needs assessments with BIP and their family members regarding their family reunification journey.²⁸⁹ Several activities were implemented as part of the project, including supporting families to access legal advice on the family reunification process, assisting the collection

of documents for visa applications and liaising with relevant authorities and embassies to facilitate reunification, supporting access to information about family reunification and life in the countries they will be moving to, and facilitating access to practical integration support on and after arrival. Multiple information tools were also developed through the project, including videos, case studies and family reunification guides.

Websites and other online platforms can be valuable tools to provide information in several different languages. Good practices introduced by national authorities include the explanatory videos in 12 languages published on the website of the Norwegian Directorate of Immigration to provide information about the family reunification process. The Norwegian Red Cross has created a handbook on the family reunification process, which is distributed at reception centres through Red Cross volunteer activities and in municipalities after resettlement. The handbook is available in seven different languages. The French government has also developed the *Réfugiés.info* website and a mobile phone app to provide information on the family reunification procedure of BIP and support structures available. The French Red Cross has developed leaflets in seven languages for both applicants in France and their families abroad, ensuring access to information even in cases where there is no internet. Additionally, they have created with UNHCR France an informative video about family reunification of BIP for applicants and social workers.

The Irish and Austrian Red Cross provide information on family reunification through their websites. In Bulgaria, a number of online platforms run by the non-governmental sector provide information on the family reunification procedure in multiple languages.²⁹⁰ Despite certain misinformation challenges, social media platforms have proved effective in overcoming access barriers, and official social media channels are widely used by the IOM Family Assistance Programme in Ethiopia, Germany, Iran, Iraq, Jordan, Kenya, Lebanon, Pakistan, Sudan, and Türkiye to share updates on visa application procedures, publish reminders against misinformation, provide informative videos on requirements and processes, and share beneficiaries' stories. Communications are delivered in different languages.

Videos and other communication activities can also be used to facilitate access to information for sponsors and their family members. For example, the Austrian Red Cross runs a dedicated YouTube channel featuring explanatory videos on family reunification. In France, the UNHCR and French Red Cross published an information video for refugees and their family members, detailing the various stages of the procedure and the means of appeal in case of refusal. For those without internet access, leaflets have been developed by Red Cross National Societies in France, Estonia, and Germany. In Germany, certain diplomatic missions abroad provide information sheets outlining the documents required for family reunification,

288 AT, DE, EE, FR, IT, SI, and NO.

289 For more details, further information can be found in the needs assessment published by the REPAIR project consortium, 2024, <https://communityengagementhub.org/wp-content/uploads/sites/2/2024/12/REPAIR-Needs-Assessment-Final-Exec-Summary-Report.pdf>.

290 Websites include www.refugeelight.bg, www.refugee.bg and www.asylum.bg.

differentiating between family reunification with beneficiaries of subsidiary protection, refugees, and others.

Finally, a Community of Practice on Family Reunification has been established in Italy, through which the Italian Red Cross, UNHCR, IOM, Save the Children, Arci, and the Italian Council for Refugees (CIR) facilitate greater outreach, share individual cases, and

align their communication strategies. The coordinated efforts of the Community of Practice allow for more consistent messaging and better identification of information gaps, enabling the development of more targeted and inclusive communication tools for those often excluded from traditional information channels.

Source: Inputs gathered via a questionnaire submitted to the IOM, UNHCR and Red Cross EU Office.



6.2. APPLICATION PROCEDURE

Article 5 of the Family Reunification Directive allows EU Member States to determine whether an application for entry and residence for the purpose of family reunification must be submitted to the competent authorities by the sponsor or their family members.

In 15 EMN Member and Observer Countries, the application must be lodged by the family member(s),²⁹¹ while in other countries this is done by the sponsor.²⁹² In Austria and Latvia, in certain cases, the sponsor's employer can submit applications for family members. When the applicant is a minor child, one or both parents (or guardians) or a third party with power of attorney complete and submit the application on their behalf.²⁹³

In the Netherlands, both the sponsor and the family members can lodge an application for family reunification. For family reunification involving sponsors who are BIP, the sponsor is generally responsible for submitting the application, in line with IND preference. However, family members also have the option to submit the application themselves. In Luxembourg, The Slovak Republic and Sweden, while the application must be submitted by the family member, it is possible for the sponsor or a third party to submit the application with a power of attorney. In The Slovak Republic, this is done in case the family member is unable to submit the application in person due to incapacity. In Estonia, in the case of a BIP sponsor, the sponsor can submit an initial application, but the family member must submit the residence permit application themselves once in Estonia.

In four EMN Member Countries,²⁹⁴ the requirements for who can apply for family reunification vary depending on whether the sponsor is a refugee or beneficiary of subsidiary protection. In Estonia, Ireland and Latvia, family members typically submit the application themselves, except where the sponsor is a BIP. Conversely, in France, it is the sponsor who typically applies for family reunification, but in the case of BIP, the application is initiated

by the family members of the BIP in their country of residence. In Malta, a person granted subsidiary protection may apply on behalf of the family members if they are in Malta at the time of the decision so that family unity may be maintained.

In those EMN Member Countries where the sponsor submits the application, several methods are available to lodge the application, including in person,²⁹⁵ online,²⁹⁶ and/or by post.²⁹⁷ Only Estonia requires the application to be submitted in person for BIP. In four EMN Member Countries, if the sponsor is an unaccompanied minor, their legal representative must submit the application on their behalf.²⁹⁸

In those countries where the family member submits the application, this is typically done at the diplomatic mission or consular post in the country where the person resides or another country where there is diplomatic representation.²⁹⁹ In France, although it is required to submit the application at the diplomatic or consular authority in the country where the family members reside, consular authorities may grant visas if the person can demonstrate unforeseen and compelling circumstances that prevented them from applying in their country of residence. In some countries,³⁰⁰ when there is no embassy or consulate in the territory of continuous residence or the country of origin, an appointment must be made at the nearest embassy or consulate. In Austria, family members of BIP can submit an application at an Austrian consular representation, regardless of their legal residence status in the country where they apply. In Croatia, BIP can submit an application for their family members for temporary residence at the competent police department or station, instead of the previous obligation for the family member to submit an application at the diplomatic mission or consular office of the Republic of Croatia.

Seven EMN Member Countries³⁰¹ allow the applications of family members to be submitted within their territory.

291 AT (or by a person authorised by the family member), BE, CZ, DE, EE (except in the case of family reunification of BIP), FI, FR (in the case of family reunification of BIP), HR, HU, IE (except in the case of family reunification of BIP), LV (except in the case of family reunification of BIP), LT, LU, SE, SK and RS.

292 BG, CY, EE (for family reunification of international protection), EL, ES, FR (except in the case of family reunification of BIP), IE (except in the case of family reunification of BIP and minors), IT, LV (for family reunification of international protection), PL, SI.

293 CZ, EE, EL, FI, HR, IE, LT, LV, NL, SK, and RS.

294 EE, FR, IE, LV.

295 BG, CY, EE, EL, ES, IE (in some cases), LU, PL, SI.

296 CY, EL, ES, FR, IE, IT, LV, NL.

297 FR, IE, LU, LV, NL, SI.

298 EL, LV, NL, SI.

299 AT, BE, CZ, EE, EL, FI, FR, HR, LT, LU, LV, NL, SE, SK.

300 CZ, DE, FI, FR, IT, LU, NL.

301 AT, BE (limited number of cases), CZ, FI (some categories: family member of a student or researcher), HR, IE (non-visa-required nationals), LV (specific cases), SK.

In Austria, the authorities may allow applications to be filed within the Austrian territory where a justified case³⁰² can be made. In Croatia, there are specific categories of third-country nationals who, exceptionally, can submit an application for temporary residence from within the territory of Croatia (even if they require a visa to enter), such as family members of a researcher coming under a guest hosting agreement and family members of EU Blue Card holders.

In nine EMN Member and Observer Countries,³⁰³ it is possible to apply online. Germany is currently rolling out this feature to cover all countries. In Ireland, family members

(who require a visa) apply online, and then must submit the relevant documentation either in person, or by post depending on the location. In Sweden, an online application is done in approximately 72% of cases. It is also possible to fill in a paper form, which can be submitted to the Swedish Migration Agency or a Swedish mission abroad. In Lithuania, the application can be completed online through the MIGRIS portal. In France, in the framework of reunification of refugees, family members of BIP can start the visa application online via the France Visas portal at a consular post of their choice, but it is only completed at an in-person visit.



6.3. DOCUMENTATION REQUIRED FROM THE APPLICANT

Proof of identity

To confirm the applicant's identity, the majority of countries require a valid travel document, such as a passport.³⁰⁴

While most countries accept legally certified copies of the passport, in Italy the applicant for an entry visa must prove their identity by presenting the passport in person.

In Belgium, the passport must have a validity of at least 12 months, while this period is three months in Slovenia. In Czech Republic, the validity of the travel document must be three months longer than the validity of the visa. In Lithuania, the travel document must remain valid for at least three months beyond the validity of the requested temporary residence permit. Sweden requires that the copy of the passport should show the personal details, validity period, country of issue, signature and permission to live in other countries.

Seven countries³⁰⁵ accept other types of proof of identity other than passports, such as national identity (ID) card. In The Slovak Republic, a valid travel document is any proof of the applicant's identity, such as a passport, diplomatic passport, service passport, emergency travel document, foreigner's travel document, EU emergency travel document, and other similar documents recognised as a travel document under an international treaty.

Box 7: Establishing identity in Estonia

In cases of regular migration, an applicant's identity is established and verified primarily on the basis of a travel document or an ID document (e.g. residence permit card). If necessary, the applicant's identity may also be established or verified using other types of evidence.

In cases of international protection, the law does not prescribe an exhaustive list of evidence, but, rather, requires the applicant to submit all direct and indirect

documents they are able to provide, which may help to substantiate or explain the facts of the case. Each document submitted is assessed individually by the case handler, who determines the facts it supports and the weight it carries. Therefore, all available documents are accepted, and in the context of identity verification, it is noted whether the identity was established based on documents or oral statements.

Three countries³⁰⁶ accept birth certificates as a proof of identity. In Austria, although the passport is the primary document used to verify the identity of the applicant, birth certificates are also accepted. In Ireland, birth certificates must be submitted alongside the application for family reunification for BIP. In France, to confirm their identity, the sponsor must present a valid residence permit or a certificate of application for renewal of the residence permit. In the case of family reunification of BIP, any proof of identity (passport, identity card, family photos, birth or marriage certificates) is accepted.

Proof of family relationship

The required documentation proving a family relationship typically includes civil status documents, such as marriage and birth certificates, depending on the categories of family members eligible for family reunification (see section 3.2).

Proof of marriage, civil partnership or partnership with unmarried partner

For proof of marriage, a marriage certificate is required in all EMN Member and Observer Countries.³⁰⁷ In France, additionally birth certificates of both spouses are required and in the case of family reunification of BIP, either a copy of the birth and/or marriage certificate, or any other document that can establish this tie is accepted. Ireland requires a copy of the spouse's birth certificate for BIP.

302 This is possible in the context of family reunification according to the Settlement and Residence Act. Next to the general rule that applications can be filed in Austria (Art. 21 Abs. 2 Settlement and Residence Act) the authority can allow such application from Austrian territory if no obstacle in accordance with Art. 11 para. 1 subpara. 1, 2, or 4 Settlement and Residence Act to issuing a residence permit exists, and, in the case of unaccompanied minors, in order to safeguard the child's welfare or to maintain private and family life within the meaning of Art. 8 ECHR (Art. 11 para. 3), that the foreigner's departure from Austria for the purpose of submitting the application is demonstrably impossible or unreasonable (Art. 21 para. 3 Settlement and Residence Act).

303 BE (limited number of cases), EL, ES, FI, FR, IE (in some cases), LT, SE and RS. For Greece, this possibility is available after the entrance into the country of the family member as the holder of a national visa for that purpose.

304 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR (family reunification of BIP), HR, HU, IE, IT, LT, LU, LV, NL, MT, SE, SI, SK, and RS.

305 EE, CZ, HR, NL, SI, SK and RS (applicable only in the case of citizens of the countries under special regime, who can enter Serbia with ID).

306 AT, CY, IE (in some cases).

307 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LV, LT, LU, NL, MT, PL, SE, SI, SK, and RS.

For proof of registered partnership or civil union, a registered partnership certificate is required in some countries.³⁰⁸ In Serbia, proof of a registered partnership is just one of several acceptable forms of evidence – a statement from two witnesses or other types of proof may also be accepted, depending on the practices in the country of origin.

Six EMN Member and Observer Countries³⁰⁹ accept proof of partnership of unmarried partners. In the Netherlands, for example, evidence includes a questionnaire attesting effective cohabitation with the partner, a copy of the unmarried status declaration relating to the applicant from the country of origin (this declaration must be less than six months old), a copy of the unmarried status declaration relating to the foreign national, and other proof of the relationship (e.g. photos, plane tickets, phone records, lease contract with names of both partners). In France, BIP must provide evidence substantiating the family relationship, such as photos, messages, call logs, or testimonies, if official civil status documents are missing. Evidence such as money transfers may also be accepted, with supporting statements when not in the recipient's name. In Sweden, if the couple has lived together in their home country or another country, they must provide a registration certificate, a rental contract or a proof of purchase of a dwelling or other documents showing that the couple has lived together, such as a rental contract where both are listed or bills from the past with their name and address. If the couple is expecting a child, they must also attach a pregnancy certificate. In Serbia, proof of unmarried status is obligatory for both partners.

Proof of family relationship with children

All responding EMN Member and Observer Countries³¹⁰ accept a birth certificate for proof of kinship with children. Other documents required by some countries include, where relevant, sole guardianship certificates,³¹¹ evidence that the applicant has legal custody over the minor,³¹² consent of the other parent,³¹³ death certificate of the other parent,³¹⁴ and adoption certificates.³¹⁵ Family record books are accepted in France and Luxembourg. Medical health certificates of children³¹⁶ are required in some cases, such as in The Slovak Republic for dependent children over 18 unable to care for themselves due to a long-term adverse health condition.

Box 8: Documentation for minor children in France

In France, to prove the family relationship with their children under the age of 18, the sponsor must present one or more of the following documents (depending on the situation):

A full copy of the birth certificate of each child with marginal notes, including those not involved in the family reunification but residing in the accommodation in France (with supplementary judgment if mentioned in the certificate).

The judgment granting parental authority (unless specified in the divorce judgment) of their minor children.

The judgment awarding custody of their minor children (unless specified in the divorce judgment).

The death certificate of their spouse, first spouse or other parent.

The court decision granting the withdrawal of parental authority from the other parent.

The declaration of abandonment of the child by the other parent, of disappearance or absence of the other parent to the court.

The family record book.

In the context of family reunification of BIP, when the application concerns a minor, the applicant must submit documentation proving the parent-child relationship with the minor.

Proof of family relationship with parents

For family reunification with parents, EMN Member and Observer Countries³¹⁷ generally require civil status documents as proof of family relationship with parents, with birth certificates being the primary form of evidence. Some countries³¹⁸ impose additional requirements, particularly in cases of dependency or need for care of parents. In Estonia, a health certificate must be submitted if the parent or grandparent requires care. Luxembourg requires proof that the parent lacks family support in their home country and is financially dependent on the sponsor, along with other documentation, including a copy of their passport, proof of civil status, and a criminal record extract.

Validation of foreign documents

The validation of foreign documents follows common procedures, often requiring legalisation, apostille certification, or sworn translations. Seventeen EMN Member Countries³¹⁹ require foreign documents to be legalised or apostilled, depending on whether the issuing country is a signatory to the Hague Convention. In cases where an apostille is not sufficient, additional authentication by embassies or consulates is often necessary. Austria, Germany and Sweden conduct additional verification checks, sometimes involving trusted lawyers or local diplomatic missions. The requirement for official translations is widespread, with most countries³²⁰ requiring documents to be

308 AT, BE, EE, EL, FI, HR, IE, IT, LT, LU, NL, SE, and RS.

309 ES, FI, FR (only for BIP), HR, IE, NL, SE, and RS.

310 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, MT, PL, SE, SI, SK, and RS.

311 CY, CZ, DE, EE, FI, LT, LV, SI, SK, and RS.

312 CZ, DE, FI, FR, IE, LU, LV, MT, NL, SE, SI, SK, and RS.

313 EE, FI, IE, IT, LU, MT, SI, SK, and RS.

314 FR, IE, SI, SK, and RS.

315 AT, CY, CZ, DE, EE, ES, FI, FR, HR, IE, LT, NL, PL, SI, and RS.

316 CY, CZ, EE, NL (adopted children only), SK.

317 CZ, EE, FR, IT, LT, LU, and RS.

318 EE, LU.

319 BE, CY, DE, EE, EL, ES, FI, FR, HR, IE, IT, LT, LU, LV, MT, NL, SK.

320 BE, CY, DE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, SK, and RS.

translated into the official language by a sworn translator or a certified authority. In Latvia, for sponsors, if translation of the documents is needed, it can be certified by a translator without requiring a sworn or notarised translator, while a foreigner may submit documents in Latvian, Russian, English, German or French.

Box 9: Challenges and good practices in respect of documentation to prove the family relationship³²¹

Complete absence or loss of documentation is common among applicants for family reunification, especially those who fled their countries in emergency or conflict-related circumstances. In other cases, documents may be incomplete, damaged or inconsistent, particularly when issued in countries where civil registration systems are weak, disrupted by conflict, or not digitised.

Certain authorities require in-person applications to obtain documentation, which may be risky or impossible for those escaping conflict or persecution. Financial limitations can further exacerbate these issues. The Red Cross EU Office highlighted that even if official documents are obtained, they may not be considered sufficient to prove the family relationship, depending on the issuing authority. This has been observed in Sweden and Norway.

The Red Cross EU Office highlighted that certain national authorities do not publicise exceptions to documentation, creating additional barriers. It also observed that some applicants face difficulties due to mismatched information between different documents (e.g. variations in names, dates, or family status), which can raise doubts during the verification process, even when the family relationship is genuine.

The IOM, UNHCR and Red Cross EU Office reported several good practices to mitigate the challenges in providing evidence to prove the family relationship. In certain cases where documents need to be certified at an embassy, countries can allow for the submission of documents via post or to an embassy of a different country. For example, in Sweden, individuals in family reunification cases can appear before another Nordic embassy if there are no Swedish consulates in the country of residence. Authorities can also follow the principle of free assessment of evidence, adopting a flexible approach to the type of evidence that can be taken into account, such as witness statements, photographs, proof of money transfers, and vaccination records.

The IOM Family Assistance Programme provides support to German national authorities. For example, where same-sex partnerships or other sensitive relationships are not legally recognised in countries of origin, IOM staff can flag such cases directly to the consulates, explaining the context and the

impossibility of standard proof. This aims to ensure more flexible assessments.

The Global Red Cross Red Crescent Network as well as the UNHCR and IOM try to maintain direct contact with consular offices in situations where individuals encounter difficulties accessing embassies. They also provide support to beneficiaries by helping them to prepare the necessary documentation in advance, reducing the likelihood of delays. This type of facilitated communication with embassies can help to signal particularly vulnerable cases to the relevant consular authorities, which may assist in prioritising appointments for children or individuals with specific protection needs.

Alternative evidence or methods of investigation

Although civil status documents such as birth and marriage certificates are the primary form of evidence, most countries³²² allow alternative methods when official documentation is unavailable or insufficient. These alternatives include personal interviews with applicants and family members,³²³ verification through embassies or consular offices,³²⁴ presentation of other supporting evidence,³²⁵ and/or DNA testing.³²⁶ While most countries maintain flexibility in assessing family ties, the extent of alternative verification methods varies. In cases involving BIP, additional flexibility is often applied, with many countries³²⁷ exempting them from strict documentation requirements (e.g. when documents are missing) and allowing broader forms of evidence.

When EMN Member Countries use in-person interviews as an alternative method to verify family ties, these interviews are typically conducted at embassies, consulates, or other designated authorities. They may involve both the sponsor in the host country and the family member abroad, with cross-referencing of information to ensure consistency. In Austria and Belgium, simultaneous interviews are held to prevent collusion. For BIP, interviews are often prioritised over documentation when documents are unavailable.³²⁸

Other supporting evidence, such as correspondence, witness statements, and historical records, may also be taken into account when assessing family ties.³²⁹ This approach allows authorities to consider a range of alternative proofs to verify relationships and prevent unjustified refusals in cases where civil status documents are unavailable due to conflict, administrative barriers, or other circumstances. In France, in the case of family reunification of BIP, elements of 'existence of a kinship' can help to establish the continuity of the relationship (e.g. letters, emails, other forms of communication and proof). Slovenia allows applicants to provide witness testimonies as part of their evidence, especially in cases involving BIP.

³²¹ This box presents an analysis of the inputs gathered via a questionnaire submitted to IOM, UNHCR and Red Cross EU Office, as explained in the disclaimer of this study.

³²² AT, BE, BG, CY, CZ, DE, EE, FI, FR (family reunification of BIP), HR, HU, IE, IT, LT, LU, LV (BIP only), NL, SE, SI, and RS.

³²³ AT, BE, BG, CY, DE, EL, FI, FR, HR, IT, LT, LU, LV (BIP only), MT, NL, SE, SI, and RS.

³²⁴ BE, CY, DE, EE, ES, FR, HR, HU, IT, LU, NL, SE, SI and RS.

³²⁵ BE, DE, EE, FR, LU, LV (BIP only), NL, SI and RS.

³²⁶ AT, BE, BG, DE, EE (in legislation but not in practice), FI, HU, IE, IT, LT, LU, NL, SE.

³²⁷ AT, BE, CY, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, SE, SI, and RS.

³²⁸ EL, FI, SI.

³²⁹ AT, BE, CY, DE, EE, ES, FR, HR, HU, IT, LT, LU, LV (BIP), NL, SE, SI.

Historical records, such as school enrolment records, social welfare records, and other historical evidence may also be accepted as alternative proof in some cases.³³⁰ The Netherlands allows applicants to provide various forms of non-official documents to substantiate their claims, provided they are deemed plausible and consistent.

DNA testing is used as a last resort in cases where doubts arise or documents are missing.³³¹ This option is typically offered at the applicant's expense and often conducted at embassies or certified institutions. In some cases, such as Hungary and Sweden, DNA testing is primarily used to verify parent-child relationships rather than spousal or extended family ties. Hungary, for example, explicitly limits DNA testing to cases involving a parent seeking reunification with a child or vice versa. In Finland, DNA testing is only carried out when the other criteria for issuing a residence permit are met, but there is no documentation as evidence.

While DNA testing is a valuable verification tool, it is generally used only when alternative forms of proof, such as interviews, historical records, or possession of status assessments, are inconclusive. In six EMN Member Countries,³³² authorities may propose DNA testing but cannot compel applicants to undergo the procedure. Luxembourg allows applicants to provide DNA test results voluntarily to strengthen their case but does not mandate them as a requirement. In Belgium, DNA tests are considered a final step in a 'cascade system' of verification, used only after all other available methods, such as interviews and document analysis, have been exhausted.

When assessing family relationships, nineteen EMN Member Countries³³³ rely on their diplomatic missions abroad to conduct background checks, authenticate documents, or facilitate interviews. In cases where an embassy is not available in the applicant's country of residence, applicants may be required to travel to the nearest diplomatic post handling migration matters. Some EMN Member Countries, such as Finland, France, Sweden and Serbia, mandate in-person verification at their embassies or consulates for document authentication, biometric data collection, and interviews.

Box 10: Good practices to providing alternative evidence³³⁴

When applicants **lack certain documents**, a number of **good practices exist to assist sponsors or family members** applying for family reunification. Where documents cannot be recovered, the self-declaration process can be applied to meet legal requirements for family reunification cases, as reported by the Red Cross EU Office (e.g. Italy). The **Austrian Red Cross research network (ACCORD)** assists in obtaining information about whether certain documents can be acquired. Additionally, the Austrian Red Cross teams include volunteers and staff from Afghanistan, Somalia and Syria, who have expertise on the

topic. If required documents cannot be obtained, the issue is discussed with the Austrian authorities and occasionally exception may be granted. The **IOM Family Assistance Programme** supports in navigating missing documentation in many countries. For example, in Lebanon and Jordan, detailed document checklists are sent by email and staff conduct pre-submission checks to ensure completeness. In Jordan, phone-based completeness checks are used, during which advisors emphasise the importance of outlining document gaps to consulates early, so that hardship claims can be considered in the visa decision process. IOM-led coordination with embassies to accept alternative proofs or legal declarations in cases of family reunification has also been successful, as in the example of the IOM Family Assistance Programme from Kenya to Germany.

Both the Red Cross EU Office and UNHCR reported collaborating with national authorities to ensure that the absence of formal documentation does not become a definitive barrier, or to allow for the necessary time to compile all required documentation.

Countries can also demonstrate flexibility in the application process. For example, following an agreement with the embassy, processing of incomplete applications for family members in Kenya can start within the framework of IOM's Family Assistance Programme while missing documents are followed up. **DNA testing** can also be requested by authorities in cases where documentation is missing. The IOM facilitates DNA testing in cases of family reunification in Italy and the Netherlands. However, the National Red Cross Societies in Europe and UNHCR consider DNA testing a last resort. In certain cases, family cannot be defined strictly in biological terms and DNA testing can have a negative effect on individuals' well-being.³³⁵

Application fees for family reunification

Sixteen EMN Member Countries³³⁶ apply administrative fees for applications for family reunifications. These differ significantly from country to country, ranging from €10 in Spain and €16 in Italy, to €160 for standard and €320 for urgent processing in Lithuania, and €560 in Latvia for an expedited procedure. Annex 7 presents an overview of the applicable administrative fees. France, Ireland and Luxembourg do not require any administrative fees for the application. However, in France, the issuance of the family reunification authorisation is subject to a fee and the family reunification procedure for refugees requires a visa fee of €99 per applicant. In Germany, the fee covers the visa issuance too and amounts to €75 for adults and €37.50 for minors.

330 NL, SI.

331 AT, BE, DE, HU, IE, IT, LT, LU, NL, SE.

332 BE, FI, IE, LU, NL, SI.

333 AT, BE, CY, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, SE, SI.

334 This box presents an analysis of the inputs gathered via a questionnaire submitted to IOM, UNHCR and Red Cross EU Office, as explained in the disclaimer of this study.

335 UNHCR, 'UNHCR note on DNA testing to establish family relationships in the refugee context', June 2008, <https://www.refworld.org/policy/legalguidance/unhcr/2008/en/59326>, accessed 28 March 2025.

336 AT, BE, CY, CZ, DE, EE, EL, ES, FI, HR, HU, IT, LV, NL, PL, SK.

In some countries, certain categories of persons are exempt³³⁷ from fees or are subject to lower fees.³³⁸ In several EMN Member Countries, BIP are exempt from administrative processing fees.³³⁹ Applicants under the age of 18 are exempt in Belgium, Greece and The Slovak Republic, while those under 16 are exempt in Lithuania. Lower fees apply for minors in some countries.³⁴⁰

In Estonia, if it is not possible to pay the state fee, the PBGB has the right to reduce the state fee rate or exempt the person from paying it, based on the person's financial situation, or on the basis of an application justified by a government institution or local government.

Additional costs may include visa issuance fees or entry permits,³⁴¹ consular fees³⁴² and costs for legalisation and translation of documents,³⁴³ service fees of service providers,³⁴⁴ medical certificates or health insurance,³⁴⁵ DNA tests,³⁴⁶ and language courses.³⁴⁷

Box 11: Overview of fees and costs incurred by applicants in Belgium

In Belgium, the family reunification visa procedure involves significant costs, including:

Travel costs to the diplomatic post; in some cases, this includes the cost of a visa to enter that country.

Consular fees, which cover the costs of the diplomatic post (€180 per person).

Service provider fees (vary from country to country, to a maximum of €40 per person).

Fees to cover the costs of the Immigration Office (€236). Family members of BIP and minors are exempt from these fees.

Fees for legalisation (€25), certified copies (€20) and certification of documents by the diplomatic post (€20). These fees are payable per document. In addition to these costs, there are costs relating to the country of origin (collection of documents, legalisation, translation by a sworn translator, etc.).

Cost to obtain a travel document.

Cost of obtaining a medical certificate (varies from country to country - between €50 and €300 approx.).

Cost of DNA test (€242 per family member).

Travel costs to Belgium. For some countries, this may involve obtaining an exit visa.

In Austria, applications for an entry permit for family reunification under the Asylum Act are subject to a fee of

€200 per person for persons over the age of six and €100 per person for persons under the age of six. In Belgium, consular fees are applicable, which cover the costs of the diplomatic post (€180 per person), while in Italy, the consular fee for the entry visa is €116. In France, in addition to paying visa fees of €99, the family member may be subject to service fees when the consular post uses an external service provider for the submission of visa applications.

Legalisation and translation costs are typically borne by the applicant. In Belgium, this includes fees for legalisation (€25), certified copies (€20) and certification of documents by the diplomatic post (€20), payable per document. Similarly, in Lithuania, the legalisation or apostille certification of documents costs €20 per document.

The cost of DNA testing is typically borne by the applicant,³⁴⁸ while in Finland³⁴⁹ and the Netherlands such costs are covered by the immigration authorities. In Ireland, for BIP, cost of this testing will be met by the Department of Justice where the testing substantiates the relationship; in other cases, costs are borne by the applicant. In Austria, DNA testing costs €270 per test, but reimbursement of costs is possible for BIP upon application after entry into Austria and if the DNA analysis confirmed the family relationship.

Other types of costs might be incurred depending on the specific application criteria. Belgium, for example, reported that the cost of obtaining the required medical certificate varies from third country to third country, ranging between €50 and €300. In the Netherlands, in some cases, the family member has to pass a civic integration exam prior to admission to the Netherlands, which costs the applicant €150.

Rejection, withdrawal or non-renewal of the residence permit of family members on grounds of public policy, public security or public health

Article 6 of the Family Reunification Directive allows EU Member States to reject an application, withdraw, or refuse to renew residence permits on grounds of public policy, public security, or public health. It prohibits refusal of renewal or removal solely due to illness or disability acquired after permit issuance.

The process to verify possible public policy or security threats typically involves background checks,³⁵⁰ criminal record assessments,³⁵¹ and consultations with national security and law enforcement agencies.³⁵² In many cases,³⁵³ applicants must provide a criminal record certificate from their home country or previous country of residence. Five EMN Member Countries³⁵⁴ have extended their security screenings to include national intelligence and

337 BE, CY, EE, EL, LT, LV, SE, SK, and RS.

338 AT, CZ, NL, SE, and RS.

339 BE, EE, LT, LV, NL (exempt if they apply for family reunification within three months of issuance of the sponsor's asylum permit), SE, SK. CY and EL only apply it for refugees.

340 AT, CZ, FI, NL, SE.

341 CY, DE, EE, EL, ES, FR, IE, IT, LU, LV, SK, and RS.

342 BE, EL, IT, LV, SK.

343 AT, BE, CY, DE, EE, EL, ES, FI, IE, IT, LT, LU, LV, NL, SI, SK, and RS.

344 BE, DE.

345 BE, CY, DE, EE, LT, LV, SK.

346 AT, BE, DE, ES, IE (in some cases), IT, LT, LU, SI.

347 AT, DE, NL.

348 AT, BE, DE, ES, IE, IT, LT, LU, SI.

349 Only if the DNA test is initiated by the authority.

350 AT, BG, DE, EE, EL, ES, FI, FR, HU, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

351 AT, BE, CZ, DE, EE, EL, ES, FR, HR, IT, LT, LU, LV, NL, SI, SK.

352 AT, DE, EE, EL, FR, HU, IT, LT, LU, LV, MT, NL, SI, SK, and RS.

353 AT, BE, CZ, EL, ES, HR, LT, LU, LV, SI, SK.

354 AT, BG, FI (if deemed necessary), HU, PL.

counter-terrorism agencies to assess potential national security risks. Additionally, authorities may consult the Schengen Information System (SIS) or other EU-wide databases, as is the case in Finland, Germany, Italy and Luxembourg, to identify individuals flagged for security concerns.

For public security concerns, most countries³⁵⁵ assess the severity of any criminal offences committed by the applicant. In the Netherlands, the IND denies residence permits if an applicant has been convicted of serious crimes, including terrorism-related offences. Similarly, Sweden considers past criminal activity when assessing an application and may involve specialised staff if security risks are suspected. France goes beyond criminal records and evaluates whether the applicant respects national values and laws, such as compliance with integration contracts or participation in unlawful activities.

Public health considerations are taken into account by several EMN Member Countries,³⁵⁶ often requiring applicants to undergo medical examinations to screen for infectious diseases that pose a risk to public health. Some countries³⁵⁷ may require medical checks, while Latvia specifically mention tuberculosis as a health condition that could lead to the rejection of a residence permit. Similarly, in Luxembourg, third-country nationals must undergo tuberculosis screening appropriate to their age. In some cases, such as Greece and Estonia, the law specifies that only diseases recognised by the World Health Organization (WHO) or other infectious, contagious or parasitic diseases requiring measures to protect public health can justify refusal on public health grounds.

Once a security or public health concern is identified, applicants are often given the opportunity to respond or appeal the decision.³⁵⁸ Estonia, for example, allows applicants to submit objections before a final ruling, while Lithuania and Hungary involve multiple government bodies in the risk assessment process before issuing a decision. In cases where residence permits are withdrawn after approval, authorities in The Slovak Republic periodically review residence holders against public security databases and may revoke permits if new risks emerge.

Best interests of the child

In all responding EMN Member and Observer Countries, the best interests of the child are a fundamental consideration in the family reunification process. The assessment is often guided by national and international legal frameworks, particularly the UN Convention on the Rights of the Child.³⁵⁹ In cases involving unaccompanied minors, additional safeguards are often applied to ensure their well-being, such as appointing legal representatives or guardians to assist them throughout the procedure.³⁶⁰

The assessment of the child's best interests is typically carried out on a case-by-case basis, considering factors such as the child's age, dependency on parents, family stability, and living conditions in the country of origin. Italy and Spain take financial and accommodation factors

into account when determining whether reunification is in the child's best interests. In France, the Netherlands and Slovenia, the evaluation considers whether the child is dependent on the sponsor, whether they have a safe environment in their home country, and whether their relocation would be beneficial.

For unaccompanied minors seeking reunification with family members, child protection welfare agencies³⁶¹ or migration authorities³⁶² are often involved in determining whether reunification is in their best interests. In Croatia, the Centre for Social Welfare provides expert assessments, while in Slovenia, the Social Work Centre's opinion is required before approving reunification. In Greece, in case of refugees, minors under 15 years old are not interviewed and their cases are assessed based on existing documentation, whereas older minors may be interviewed to determine their needs.

While most countries focus on the child's well-being and rights, coordination with authorities in the departure country is often limited or non-existent. Austria reported that such coordination was impossible due to difficulties in establishing contact, while Sweden and the Netherlands confirmed that they did not engage in direct cooperation with authorities in the country of origin. However, in France, the Prefect may contact diplomatic or consular authorities for information on the family members of the sponsor. Similarly, Slovenia requires an additional evaluation if there are doubts about whether reunification is in the child's best interest. In 2024, Italy introduced regulations for identifying family members of unaccompanied foreign minors, allowing the Ministry of Labour to partner with international organisations on programmes to trace family members of minors.

Box 12: Restoring family links

For cases where the tracing of family members proves to be difficult, the National Red Cross and Red Crescent Societies provide the 'Restoring Family Links' service in many countries, including Luxembourg, to help keep families together and address the needs of those separated or missing due to humanitarian crises or natural disasters. In Luxembourg, the National Society can help migrants and refugees with tracking family members. When a request for tracing is received, the Luxembourg Red Cross will launch the search by using the Family Links Network composed of Red Cross and Red Crescent Societies, the International Committee of the Red Cross (ICRC) and the International Federation of Red Cross and Red Crescent Societies (IFRC). The ICRC and IFRC are generally contacted for a search in contexts affected by conflict or natural disasters.

Duration of procedure

Article 5(4) of the Family Reunification Directive stipulates that the national competent authorities shall give a written notification of the decision to the applicant

³⁵⁵ AT, BE, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, NL, SE, SI, SK, and RS.

³⁵⁶ BE, CZ, EE, EL, ES, FR, HR, IE, LT, LU, LV, MT, NL, SI, SK.

³⁵⁷ BE, FR, LU, MT, SK.

³⁵⁸ BE, EE, EL, ES, FI, FR, IE, IT, LT, LV, NL, SI, SK.

³⁵⁹ CZ, DE, FI, FR, LT, LU, NL, SE, SI.

³⁶⁰ DE, EE, EL, FI, FR, HR, NL, LU, SE, SI.

³⁶¹ DE, HR, IE, SE, SI.

³⁶² BG, DE, EE, ES, FR, IT, LU, LV, NL.

as soon as possible and in any event no later than nine months from the date on which the application was lodged.

Across the EMN Member and Observer Countries, the processing time for family reunification applications varies significantly between the legal time limits and the duration in practice. Many countries have legal deadlines for decision-making depending on the type of application, the applicant's status and national procedures. This ranges from 30 days in Croatia, Latvia, the Slovak Republic, Slovenia and Serbia to nine months in Belgium, Cyprus, Czech Republic, Malta and Luxembourg. The time limit for EU Blue Card holders is significantly shorter in some cases, for example 10 working days for family members of EU Blue Card holders in Latvia. In some EMN Member and Observer Countries,³⁶³ this timeline includes the notification of the decision to the applicant, while in others it does not.³⁶⁴ Annex 6 presents an overview of the official duration to receive a decision on an application and the duration in practice. In practice, however, processing times are often longer due to administrative delays, document verification issues, and high case volumes.³⁶⁵ Some countries, such as Ireland, have no legal time limit and experience significant delays in processing applications after all documents have been submitted.

The average duration in practice is shorter than the legal deadline in some countries.³⁶⁶ Here, applications are typically processed within the prescribed legal timeframe, with some cases being resolved even faster, such as in Cyprus (37 days) and Lithuania (39 days under standard processing). In the Netherlands, applications where the sponsor is a BIP take significantly longer, with an 87-week waiting period, while 63% of other family reunification applications are processed within three months.

The appeal period for rejected family reunification applications varies between countries, with most allowing 15 to 30 days for applicants to challenge a decision. Some countries³⁶⁷ set the appeal period at 15 days, ensuring a quick review process. Other countries³⁶⁸ provide a 30-day appeal window, giving applicants more time to prepare their cases. In Greece, the appeal period is set at two months for legal migration cases and 10 days for international protection cases. Germany recently removed the option to appeal to the Foreign Office, leaving courts of appeal as the only recourse for rejected applicants. This change aims to free up capacity in foreign missions to accelerate visa processing and to support full digitalisation of the procedure, which improves application quality by ensuring that all required documents are submitted.

To reduce processing times, some countries³⁶⁹ have introduced digital applications and automation. In the Netherlands, for example, the government has implemented technical innovations and automation to handle

backlogs more effectively. However, not all countries have taken measures to shorten processing times, and in some cases,³⁷⁰ increasing application volumes have led to longer delays, despite existing deadlines.

Visa requirements

In 19 EMN Member and Observer Countries,³⁷¹ a visa is required for family members of visa-required countries to enter the country before obtaining a residence permit.

Several countries³⁷² allow residence permits to be issued directly abroad or through international organisations if there is no diplomatic mission available. In Lithuania, applications for residence permits can be submitted through external service centres abroad, allowing family members to receive their residence permit before entering the country. Sweden grants a residence permit when the applicant is abroad, while visa-exempt applicants can travel and collect their residence permit card on arrival. Similarly, in Slovenia, residence permits for family reunification can be issued at diplomatic missions or consulates abroad. If there is no diplomatic presence, international organisations may assist in delivering the permit. Finland also grants residence permits when abroad and the applicant receives a residence card via a Finnish diplomatic mission. They do not need a separate visa to travel to Finland. Those categories who are able to use the fast track (e.g. specialists, start-up entrepreneurs, students, researchers and their family members) also have the possibility to apply for a long-stay visa (Visa D), allowing them to enter Finland immediately after being issued a residence permit instead of remaining outside Finland while they wait for the residence permit card.

Procedure applicable to visas

In most EMN Member and Observer Countries,³⁷³ the visa application process for family reunification requires applicants to submit their request at a diplomatic mission, consulate, or an external service provider in their country of residence. In some countries, the process involves an online application or pre-registration system, where applicants must create an account, fill in an online form, and then schedule an appointment to attend in person.³⁷⁴ Many countries³⁷⁵ require in-person submission of biometric data, including fingerprints and photographs, at the consular office or visa application centre. In Belgium and France, in exceptional cases, remote applications may be accepted when physical submission is impossible due to conflict or security risks.

Certain countries³⁷⁶ integrate the visa application with the residence permit process, meaning the visa is only issued if residence is approved. For long-stay visas, some countries³⁷⁷ require prior approval from national migration

³⁶³ CY, HR, IT, LT.

³⁶⁴ FI, FR, SE, SK, and RS.

³⁶⁵ AT, BE, EL, FI, FR, NL, SE.

³⁶⁶ CY, CZ, EE, LT, SI.

³⁶⁷ CZ, HR, SI, SK, and RS.

³⁶⁸ BE, DE (one month), ES, FI, FR, LV, NL, SE.

³⁶⁹ ES, EL, FI, FR, IT, LT, NL.

³⁷⁰ BE, EL, FR, NL, SE.

³⁷¹ AT, BE, BG, CY, CZ, DE, EE, EL, ES, FR, HU, IE, IT, LU, MT, NL, SI, SK, and RS.

³⁷² FI, LT, LV, SE, SI.

³⁷³ AT, BE, CY, CZ, DE, EE, EL, ES, FR, HR, HU, IE, IT, LU, LV, MT, NL, SI, SK, and RS.

³⁷⁴ BE, DE, FR, IE, IT, LU.

³⁷⁵ BE, CY, CZ, DE, EE, EL, ES, FR, HR, HU, IT, LU, LV, NL, SI, SK.

³⁷⁶ AT, HU, LV, NL, SK.

³⁷⁷ AT, EL, ES, FR, IT, LU, LV, NL, SI, SK.

authorities before issuing a visa. In these cases, consular authorities verify the family relationship, public order concerns, and health conditions before granting the visa (see section 6.3.3). Some countries³⁷⁸ require the visa to be obtained within a specific timeframe after the residence permit or reunification approval is granted. In some cases,³⁷⁹ applicants must undergo a mandatory consular interview to confirm their relationship and intention to reunite.

The legal time limit for deciding on a visa application varies between countries, typically ranging from 15 days (Cyprus) to up to nine months (Greece, the Netherlands). Some countries³⁸⁰ process visa applications within 15 days, with extensions possible for justified reasons. Estonia, Italy and Slovak Republic set a 30-day limit and Spain requires a decision within one month, while France generally has a two-month deadline but can extend this period for additional verification. Other countries, such as

Luxembourg and Ireland, do not have a fixed legal time limit but provide general guidelines for expected processing times (see Table 1).

The average duration of the visa procedure for family reunification varies significantly between countries. In some countries,³⁸¹ the process is relatively quick, often completed within one to two weeks provided all necessary documentation is in place. France has seen an increase in appointment times, ranging from 2 to 10 weeks, leading to longer processing periods. Spain completes the process in one month on average. Czech Republic typically processes applications within three months, with an average decision time of 79 days, excluding notification. Ireland does not provide specific data, as processing times vary depending on the issuing office and application type. In Germany, times vary considerably, depending on the consular representation's volume of cases and capacity, as well as the complexity of the case.

Table 1. National deadlines set by the law and average duration in practice for visa procedure in EMN Member and Observer Countries

| EMN Member or Observer Country | National deadlines set by law | Average duration in practice |
|--------------------------------|--|--|
| Austria | Without undue delay and within a maximum of six months | Not specified |
| Belgium | No deadline, expected within one month | Not specified |
| Bulgaria | 15 days | 15 days |
| Croatia | 15 days (extendable to 45 days) | Seven working days |
| Cyprus | 15 days | One week |
| Czech Republic | N/a | Three months. In 2024, the average time for making a decision was 79 days, however, this number does not include the notification of the decision. |
| Estonia | 30 days (family reunification of refugees) / two months (Aliens Act) | Two months |
| France | Two months (extendable twice by four months for verification) | Dependent on the consular post from 5 to 15 months |
| Germany | No deadline | No data on average duration |
| Greece | Legal migration: Up to nine months (extendable by three months in exceptional cases) for the completion of the whole procedure for family reunification (visa and residence permit) International protection: No specified time | In international protection, in cases where the documents requested are submitted promptly, the duration of the procedure is a few months. However, in most cases the submission of the documents is delayed, so the average duration of the procedure can be about one year |
| Ireland | No deadline, expected within 12 months | Varies based on office and application type |
| Italy | 30 days | 30 days (can be extended for document checks) |
| Latvia | 15 days | 15 days |
| Luxembourg | No specific deadline | Relatively quick |
| Lithuania | 15 days (extendable up to 45 days) | 15 days |
| Malta | Six - eight weeks | Six - eight weeks |
| Poland | 15 days (extendable to 30 days) | 15-45 days |
| The Netherlands | Nine months | 87 weeks (family reunification of refugees) / three months for other cases |
| Slovak Republic | 30 days | Not specified |

378 AT, BE, EE, ES, FR, IT, LU, LV, NL, SI, SK.

379 BE, EL, ES, FR, IT, LV, SI, SK.

380 CY, HR, LV, and RS.

381 CY, HR, LV.

EMN Member or Observer Country National deadlines set by law

| EMN Member or Observer Country | National deadlines set by law | Average duration in practice |
|--------------------------------|---------------------------------|------------------------------|
| Spain | One month | One month |
| Serbia | 15 days (extendable to 30 days) | Not specified |

Several EMN Member Countries³⁸² have implemented measures to expedite visa processing and facilitate family reunification. As of 2025, Germany has completed the full digitalisation of the visa application process. Several countries³⁸³ have outsourced visa application processing to external service providers to enhance efficiency and reduce administrative burdens. Belgium and France have introduced digital solutions to streamline applications, with Belgium piloting a project that fully digitalises the visa process. Croatia and Spain provide priority appointments or preferential processing for family reunification cases.

Rejection, withdrawal or non-renewal of residence permit of family members

Residence permits for family reunification are subject to ongoing compliance with conditions such as sufficient resources, accommodation, and sickness insurance, as per Article 7 of the Family Reunification Directive (see section 4). If these requirements are no longer met, authorities have the right to reject, withdraw, or refuse to renew a residence permit.³⁸⁴ Article 16 allows EU Member States to also consider fraud, misleading information, or changes in the family relationship as grounds for withdrawal. This provision has been transposed by some countries.³⁸⁵

Twenty-three EMN Member and Observer Countries³⁸⁶ provide for the rejection, withdrawal, or non-renewal of residence permits if the sponsor and family member no longer maintain a real marital or family relationship. This is commonly assessed during the first few years of residence, with authorities checking for ongoing compliance with family reunification requirements. In France, in the context of family reunification of BIP, the residence permit issued to family members cannot be withdrawn except for reasons of public order. However, the residence permit may be withdrawn if the sponsor loses their refugee status.

Ten EMN Member and Observer Countries³⁸⁷ have specific procedures in place to investigate and prevent marriages of convenience, ensuring that family reunification is not used to circumvent immigration laws. These investigations typically involve interviews, background checks, and assessments of the couple's living arrangements, financial interdependence, and communication patterns. Authorities may also look into discrepancies in personal information, the absence of a shared language, or a lack of evidence of genuine cohabitation.

Twenty-one EMN Member and Observer Countries³⁸⁸ have legal provisions to reject, withdraw, or refuse to renew residence permits if a marriage, partnership, or adoption is found to have been arranged solely to facilitate entry or residence. Authorities assessing whether the relationship is genuine consider factors such as lack of cohabitation, limited knowledge about each other, or evidence of fraudulent intent. Some countries³⁸⁹ explicitly outline criteria for identifying marriages of convenience. In Belgium, authorities may conduct checks during the first five years of residence to ensure that family reunification conditions are still met. If a marriage is found to have been concluded solely for immigration purposes, the residence permit can be revoked. Similarly, in Serbia, the Law on Foreigners specifies that residence will not be granted or extended if there is reasonable suspicion that the marriage was concluded solely to obtain a residence permit. Signs of a marriage of convenience include spouses not living together, failing to provide truthful information, or not speaking a common language. In Germany, municipal authorities conduct examinations based on general principles, but there are no standardised procedures for investigating marriages of convenience. In Greece, authorities consider a marriage to be one of convenience if the family members are unaware of key personal details about each other or if there is evidence suggesting they have never cohabited. This presumption is particularly strong when combined with other suspicious circumstances.

Twenty-one EMN Member and Observer Countries³⁹⁰ provide for rejection, withdrawal, or non-renewal of a residence permit if it is found that the sponsor or unmarried partner is married or in a long-term relationship with another person. Authorities assess compliance with family reunification conditions and many conduct checks during the initial years of residence to verify the authenticity of relationships. Belgium, Finland, Sweden and Serbia, for example, explicitly outline that fraudulent marriages or concurrent relationships can lead to residence permit termination.

Twenty-two EMN Member and Observer Countries³⁹¹ provide for the rejection, withdrawal, or non-renewal of residence permits if false or misleading information, falsified documents, fraud, or other unlawful means were used during the family reunification process. Authorities may revoke permits if fraud is detected after issuance, with some countries explicitly outlining legal consequences, including reopening cases or imposing penalties. Typically, consular and migration authorities verify documents and may refuse visas or permits if fraud is suspected. Some countries, such as Greece, require official verification or a

³⁸² BE, ES, FR, HR, NL, SK.

³⁸³ BE, FR, SK.

³⁸⁴ AT, BE, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, NL, SE, SI, SK, and RS.

³⁸⁵ AT, BE, BG, CZ, EE, EL, ES, FI, FR, LT, LU, LV, MT, NL, PL, SE, SI, SK.

³⁸⁶ AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

³⁸⁷ AT, BE, CZ, EL, ES, FR, IT, MT, SE, and RS.

³⁸⁸ BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

³⁸⁹ BE, EL, FI, FR, SE, SI, and RS.

³⁹⁰ BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR (for family reunification of BIP, the residence permit granted to family members can only be withdrawn on grounds of public order or if the sponsor loses their status), HR, HU, IE, IT, LT, LU, LV, MT, NL, SE, SI, SK, and RS.

³⁹¹ BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

court decision to prove fraud, while Ireland and Sweden allow authorities to act based on reasonable suspicion. Ireland has a procedure that offers applicants the chance to respond in such instances by providing further information and clarification before a final decision is made. In Finland, a September 2024 amendment to the Aliens Act clarifies that a residence permit based on family ties may be denied in cases of suspected misuse, such as relationships formed solely for immigration purposes, use of a child for entry, risk of exploitation, or if the sponsor obtained their permit through false or misleading information.

In 23 EMN Member and Observer Countries,³⁹² if the sponsor loses their residence status, the family members' permits may also be withdrawn or not renewed. In most countries,³⁹³ that withdrawal or non-renewal is automatic unless the family member has an independent legal basis to remain.

Eleven EMN Member and Observer Countries³⁹⁴ allow family members to apply for independent residence under

specific conditions, such as long-term residence, employment, or education. Others³⁹⁵ also consider humanitarian factors, such as domestic violence or the impact on private and family life, before revoking residence permits. Other cases³⁹⁶ where family members can transition to independent residence permits include legal separation, the death of the sponsor, or reaching adulthood.

Box 13: Independent residence permit in Sweden

In Sweden, if a relationship ends, a family member may still be granted an independent residence permit under specific circumstances. This includes cases where the individual has developed strong ties to Sweden, has been subjected to violence or serious violations in the relationship, or if there are other compelling humanitarian reasons. This provision aims to protect vulnerable individuals, particularly those in abusive relationships, from losing their legal residence status.



6.4. CHALLENGES AND GOOD PRACTICES

Challenges faced by applicants

Most EMN Member Countries reported challenges associated with the family reunification procedures experienced by sponsors and family members.³⁹⁷ Lengthy processing times and bureaucratic delays are common in some countries,³⁹⁸ with some applicants waiting over a year for a decision. Access to consular services is a major hurdle, especially in conflict zones or countries without local diplomatic missions, requiring applicants to travel long distances at great expense and risk.³⁹⁹ High costs associated with applications, legalisation of documents, DNA tests, and travels create financial burdens⁴⁰⁰ which could prevent some families from completing the process.⁴⁰¹ Difficulties in obtaining the required documentation, particularly in cases where civil registry systems in the home country are weak or non-existent, is another main challenge for applicants.⁴⁰² Some countries impose strict evidentiary requirements, which may be especially hard to obtain for refugees or those fleeing persecution.⁴⁰³ In many cases, family reunification procedures do not account for the unique circumstances of BIP, leading to rejections or prolonged separation.⁴⁰⁴ In Luxembourg, for example, family members of beneficiaries from Eritrea, Guinea, Senegal and Uganda navigate a particularly burdensome and protracted process, involving an external service provider, lengthy waits for embassy appointments, and, in some cases, costly travel to third countries to

initiate the visa application. Germany highlighted that women sponsors find it more of a challenge to fulfil the material requirements, where these are not waived.

Digitalisation efforts are underway in some countries, but technical issues, a lack of accessibility, and inconsistencies in service providers often create additional barriers.⁴⁰⁵

In Ireland, digitalisation efforts have been introduced to streamline the family reunification process, but there are no built-in translation or support features, making it challenging for applicants unfamiliar with English to complete their applications correctly.

In terms of the quality and user-friendliness of the information provided to applicants, Belgium reported that although each diplomatic post provides information, it is not always exhaustive and may vary from one diplomatic post to another, with the information on fees not always easy to find. Also, the information provided on the websites of external service providers of the diplomatic posts is not always accurate or exhaustive. Finally, vulnerable groups, including women, children and refugees, face additional risks and obstacles, particularly in proving family ties or obtaining the necessary paperwork.⁴⁰⁶ France reported that women, especially Afghan women, face severe obstacles in accessing family reunification. Due to restrictions on their movement in Afghanistan, they often cannot travel to neighbouring countries to reach French

392 AT (only in case of a derived temporary residence permit under the Settlement and Residence Act), BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

393 BE, CY, DE, EE, EL, ES, FR, HR, HU, IT, LT, LU, LV, NL, SI, and SK.

394 AT, BE, CZ, DE, EE, EL, ES, FI, FR, IE, IT, LT, LU, SI, SE.

395 BE, CZ, DE, EE, ES, FI, FR, IE, LU, SE, SK, and RS.

396 CZ, EL, ES, FI, FR, IE, IT, LT, LU, SE, SI, SK, and RS.

397 AT, BE, BG, DE, EL, FI, FR, IE, IT, LT, LU, LV, NL, PL, SE, SI, SK.

398 BE, DE, EL, FI, FR, IE, LV, NL, SE.

399 AT, BE, BG, DE, EE, FI, FR, IE, IT, LU, NL.

400 AT, LU.

401 BE, DE, FI, FR, IE, IT, LV, SE.

402 AT, BE, BG, DE, FI, FR, IE, IT, LU, LV, NL, PL.

403 FR, IE, LT, SI.

404 BE, DE, FI, FR, IE, LU.

405 BE, FI, FR, IE.

406 EL, FI, FR, LU.

consulates, putting their reunification applications at risk. Single mothers and widows face additional bureaucratic barriers, as they must provide legal documents proving custody of their children – documents that are often impossible to obtain in conflict zones.

Challenges faced by national authorities

National authorities across 12 EMN Member Countries⁴⁰⁷ face several common challenges in implementing family reunification procedures.

Many countries⁴⁰⁸ reported limited administrative capacity, staff shortages, and increasing application volumes, leading to delays in processing. Communication barriers, including difficulties in accessing interpreters and verifying documents, particularly for applicants from conflict zones, further complicate assessments.⁴⁰⁹ Another challenge for national authorities is the fragmentation of responsibilities between different institutions, creating inefficiencies and prolonging decision-making and interinstitutional coordination.⁴¹⁰

Authorities struggle to verify family relationships, especially when documentation is unavailable⁴¹¹ or when the definition of ‘family’ in countries of origin differs from national legal frameworks.⁴¹² France reported that applicants exploit legal loopholes, bypassing formal reunification channels by entering the country through short-stay visas and later applying for residence, which places additional strain on authorities. The Netherlands and Sweden reported that the need to verify alternative forms of evidence when official documents are unavailable extends processing times and increases administrative burdens. Lithuania also faces delays due to requirements for security and background checks conducted by multiple agencies, slowing decision-making.

Good practices

Thirteen EMN Member Countries⁴¹³ identified several good practices to improve family reunification procedures and address the challenges related to administrative burdens, document verification, and access to services. The digitalisation of application processes is widely recognised as a positive development, reducing processing times and improving accessibility for applicants.⁴¹⁴ France has leveraged digitalisation through the France Visas platform, centralising visa applications. Italy’s centralised digital application system and The Slovak Republic’s dedicated appointment slots for family reunification applications reduce processing delays.

To address financial barriers, Ireland and Latvia provide assistance with travel expenses and administrative fees for low-income BIP, making reunification more accessible for vulnerable families. In Latvia, the first-time residence permit application fee is waived for all BIP and their family members, but no financial support is provided for

other related fees or expenses. Ireland’s Travel Assistance Programme provides limited financial assistance and administrative support with the logistics associated with achieving family reunification to BIP, and resettled refugees with low incomes or on social welfare.

Improving access to information is another key focus,⁴¹⁵ with authorities and civil society organisations expanding their multilingual online resources and legal guidance. Belgium has improved its Immigration Office website, with information widely available in English. Latvia continues to refine its information portal, while in France, the Red Cross and the UNHCR developed legal factsheets, training initiatives, and multilingual videos to support applicants and professionals.

Standardisation and national-level coordination are emphasised in Finland, Germany, Italy and the Slovak Republic, where efforts to harmonise application processes across administrative offices have improved efficiency. In Finland, cooperation between authorities, particularly social services and the Finnish Immigration Service, has significantly improved, along with better collaboration with the Ministry for Foreign Affairs. In Germany, cooperation between the Ministry of the Interior and the Foreign Office has streamlined procedures. Additionally, Lithuania has introduced legal amendments to extend application deadlines, offering families more time to complete the reunification process under favourable conditions.

The introduction of priority processing for reunification applications involving unaccompanied minors or individuals with special needs is recognised as an effective measure in Italy. In Slovenia, enhanced cooperation with international organisations helps to facilitate evidence gathering and reduce the burden of proof on applicants, particularly where diplomatic missions are not available.

Box 14: Good practices in supporting applicants during the application procedure⁴¹⁶

Since the judgment in the CJEU Afrin case,⁴¹⁷ EMN Member Countries are required to demonstrate flexibility in cases in which it is difficult or impossible for the applicant to present themselves in person. As they have the right to decide which alternative application methods they accept, EU Member States’ approaches vary.

The Swedish Migration Agency provides an **online application platform** on its website and applications can also be submitted at its service offices. In Lithuania, family members have to fill the application by themselves. The integration of **MIGRIS** has allowed family members to submit applications and book appointments online after completing their forms, eliminating appointment shortages, trading, and long queues. Since 2023, third-country nationals can submit applications for temporary residence permits abroad via external service provider centres in 31

407 AT, BE, EL, FI, FR, IE, IT, LT, LU, LV, NL, MT, SE, SI, SK.

408 AT, BE, DE, EE, FR, IE, IT, LV, NL, SE.

409 AT, BE, IE, FR, LT.

410 EL, FR, IT, LT.

411 BE, LU, MT, NL, SK.

412 AT, IE, FI, FR, MT, NL.

413 AT, BE, DE, FI, FR, HR, IE, IT, LT, LU, LV, NL, SK.

414 AT, DE, EE, FI, FR, IE, IT, LT, MT, NL.

415 BE, EE, FR, IT, LV, MT.

416 This box presents an analysis of the inputs gathered via a questionnaire submitted to IOM, UNHCR and Red Cross EU Office, as explained in the disclaimer of this study.

417 CJEU Case C-1/23 PPU, Afrin, 30 May 2023, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62023CA0001>, accessed 11 April 2025.

countries. This has significantly improved accessibility, removed the need for a visa solely to submit an application, and enables applicants to collect their residence permit card before travelling to Lithuania.

The IOM Family Assistance Programme reported that **digitalisation processes** in Germany have helped to **reduce administrative barriers** for applicants in several countries. For example, remote document checks are now offered in Lebanon, Iraq and Jordan, and documents can be submitted in advance by email. In Kenya, all visas applications are done physically at the embassy by the Family Assistance Programme office, however families, representatives or lawyers can submit all documents electronically. The use of the IOM Family Assistance Programme has improved the quality of the applications received by consular representations, thereby shortening the processing times and reducing the workload.

National authorities can adopt **flexible approaches**. For example, Germany's Foreign Office accepts the submission of so-called informal applications to the responsible German authority abroad. This application only needs to include the minimum required information about the reference person and the family members seeking reunification. Submitting an informal application ensures that deadlines are met and 'freezes' the age of minor children at the date of receipt, allowing them to continue to be considered minors even if their final interview takes place after they have reached the age of majority (no proof of sustenance, housing and pre-integration requirements are asked).

Spain and Sweden have addressed some of the **challenges linked to long procedures for family reunification**. In Spain, the Ministry of Foreign Affairs and the Ministry of the Interior have established a fast-track visa issuance procedure (approximately one month) once family reunification cases under Article 40 of the Asylum Law are approved, for beneficiaries of subsidiary protection or refugees. Family members are contacted directly by the Spanish embassy, which organises an appointment within 15 days.

International organisations are working to **alleviate challenges associated with long procedures** for family reunification. The Italian Red Cross collaborates with associations, charitable organisations and other relevant entities to develop joint initiatives to address the concrete needs of families, particularly large families (e.g. flight costs, reception, accommodation). In the Netherlands, through the IOM's Family Reunification Hotline, family members are referred to local assistance abroad depending on their specific needs (e.g. access to protection, legal or medical services).

The IOM operates **Migration Health Assessment Centres** (MHAC) in most countries of departure,⁴¹⁸ where family members can receive the **necessary medical assistance to facilitate safe departure** to the country of destination. There are also instances

when medical issues are flagged in advance by family members or supporting civil society organisations in general terms and mentioned as a reason to request the IOM's support with pre-departure and movement. In such cases, migrants are referred to MHAC before departure.

The participating international organisations mentioned several good practices to support family members to **obtain valid travel documents** in cases where they are lacking or in the event of the impossibility of obtaining the requisite travel document from their country of origin. A **laissez-passer** or a 'travel document for foreigners' can be issued in the absence of travel documents. However, this is often offered on a case-by-case basis and is not consistently offered by all consular posts. A laissez-passer can be issued by French consulates, for example, but the France-Visas website does not provide easily accessible information on it. German authorities can issue a 'travel document for foreigners' to individuals applying for a family reunification visa if it is impossible or unreasonable for them to obtain a national passport. However, the Red Cross EU Office highlighted that it can be complex for individuals to prove that there are difficulties in obtaining a national passport.

In exceptional circumstances, the **ICRC Emergency Travel Document** (ETD) has proven useful to allow family members entitled to family reunification but who otherwise would not have been able to leave the country of departure to travel to their country of destination. However, the ETD is only issued in a limited number of cases and cannot be considered a practice on which authorities can generally rely to ensure the travel of family members to their territory. Use of the ETD is contingent on both the exit and entry countries recognising the document, and certain countries do not permit its issuance. Generally speaking, all EU countries recognise it.

The IOM manages a **self-pay family reunification project** in the Netherlands. Activities range from consultation with family members in the country of departure to advise them on steps to take, travel assistance through which IOM provides pre-departure support and arranges travel to the Netherlands, and assistance at airports of departure, transit, and destination.

Family assistance programmes can facilitate the reunification of sponsors and family members from specific regions.⁴¹⁹ As well as the IOM Family Assistance Programme that provides support for family reunification cases to Germany, IOM Kenya partners with local community organisations to provide services during the visa-processing period, particularly for survivors of gender-based violence or families lacking safe housing.

Finally, the Irish Red Cross runs a **travel assistance programme** in partnership with the IOM. Irish Red Cross provides limited financial and administrative support with logistical aspects, such as organising exit visas for family members given by the IOM. Ad

418 MHACs are present in 50 countries across Africa, Asia, Europe and the Middle East, offering varied pre-migration health activities depending on the location and the specific destination country programme.

419 Country-specific family assistance programmes currently exist in Kenya and Türkiye.

hoc assistance can be offered to applicants in terms of following up on Irish travel documents, entry visas or extensions of family reunification permits where needed.

7. ACCESS TO RIGHTS FOLLOWING FAMILY REUNIFICATION

This section presents a comparative overview of the rights that follow family reunification. This includes access to rights (section 7.1), access to autonomous residence permits (section 7.2), additional rights granted to family

members (section 7.3), long-term residence and naturalisation (section 7.4), and relevant challenges and good practices (section 7.5).



7.1. ACCESS TO RIGHTS

Access to education

Family members are entitled to access education once in Europe. Article 14(1) of the Family Reunification Directive obliges EU Member States to provide the same access to education for family members as for the sponsor.

EMN Member and Observer Countries⁴²⁰ reported that they provide **children** with access to their compulsory education system. The upper age limits for compulsory schooling set by national legislation also apply to all third-country nationals, including family members in cases of family reunification.

Certain EMN Member Countries⁴²¹ have introduced tailored approaches to facilitate the entry of foreign students into the national schooling system. These can include integration lessons, language training, and adapted schooling for those less able to learn in the national language(s).

When family members are above compulsory schooling age, EMN Member Countries⁴²² can provide the same access to further education as for nationals, which often reflects the sponsor's right to further education. In some EMN Member Countries,⁴²³ access to higher education for adults is available for family members upon application if certain conditions are met. For example, in Lithuania, adult third-country nationals can access higher education if they meet the entrance requirements, which is assessed by the Centre for Quality Assessment in Higher Education or by higher education institutions accredited by the Ministry of Education and Science. The recognition process is free of charge. EMN Member Countries⁴²⁴ also support **access to higher education** by providing a framework or services to facilitate the **recognition of foreign diplomas and**

qualifications of third-country nationals, including family members.

Box 15: Recognition of foreign educational qualifications

In Croatia, recognition and evaluation of foreign educational qualifications is enshrined in national law and is carried out based on the provisions of the Act on the Recognition and Evaluation of Foreign Educational Qualifications (Official Gazette, 69/2022). In Finland, the recognition of qualifications refers to a decision on the eligibility that foreign qualifications confer when applying for a job or study placement. Recognition decisions are made by competent authorities, education establishments, higher education institutions, and employers.

In Luxembourg, applications for the recognition of equivalence for primary and secondary education are sent to the Department for the Recognition of Diplomas of the Ministry of Education, Children and Youth. For the recognition of higher education, different options exist for applicants. Academic recognition involves registering the qualification in the Register of Formal Higher Education Qualifications, while professional recognition provides access to a regulated profession. Applications must be submitted to the Ministry of Research and Higher Education.

Additional special measures have been introduced for all third-country nationals in certain EMN Member Countries to further support their access to education. **Civic education and/or language training** is offered to third-country national family members,⁴²⁵ or specifically to BIP and their family members.⁴²⁶ **Language lessons** are

⁴²⁰ AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and RS.

⁴²¹ AT, LU.

⁴²² AT, DE, ES, FI, IE, LU, SI.

⁴²³ DE, EE, FI, IE, LT, SE.

⁴²⁴ AT, DE, EE, FI, HR, LT, LU, SE.

⁴²⁵ BE, DE (access granted to integration courses (language and civic training), but generally not free of charge unless the participant is a BIP, dependent on social welfare, and/or is considered low-income; participation is mandatory unless the person already has a good command of the German language), EE, FI, FR, IE (language training only), IT, LU.

⁴²⁶ CZ, EE, FI, FR, NL, SK.

also offered to minors in addition to those offered through primary and secondary education in a number of EMN Member Countries.⁴²⁷

Access to employment and self-employed activity

As per Article 14(1) of the Family Reunification Directive, EU Member States are obliged to give family members access to employed and self-employed activities, reflecting the access granted to the sponsor. However, they have the authority to decide the conditions under which employed or self-employed activities can be exercised and can set a time limit of a maximum of 12 months during which they can perform a labour market test before authorising family members to perform an employed or self-employed activity (Article 14(2)). Access can also be restricted for family members in the direct ascending line or unmarried children (Article 14(3)).

Several EMN Member Countries provide **unrestricted access** to the labour market for the family members of all third-country nationals who are over the minimum legal age for work,⁴²⁸ while others make access to the labour market dependent on the residence permit and associated access rights of the sponsor.⁴²⁹ For example, in Ireland, when family members are not granted access to the labour market, they can apply for an employment permit separately.

Specific additional measures can also be implemented to support family members to access the labour market when they have the right.⁴³⁰ Furthermore, the recognition of foreign diplomas, and qualifications for family members in a number of EMN Member Countries⁴³¹ can also facilitate labour market access.

Box 16: Recognition of skills in Luxembourg

In Luxembourg, the accreditation of prior experiential learning is a process for the formal recognition of professional or personal skills for the purpose of obtaining a qualification. For secondary education accreditation, applications must be submitted to the Ministry of Education, Children and Youth. For higher education accreditation, the process is decentralised, and each institution sets its own procedures.

In some EMN Member Countries, family members have **restricted rights** to the labour market⁴³² or do not have access to self-employment.⁴³³ A **labour market test** is required for family members in certain EMN Member Countries,⁴³⁴ although this is waived in EU Member States for family members of EU Blue Card holders⁴³⁵ and researchers, and, in some Member States, for family

members of intra-corporate transferees. In Luxembourg, the labour market test was abolished in 2023, allowing unrestricted access to the labour market for all family members.

Vocational guidance and training

Under the Family Reunification Directive, EU Member States must provide access to vocational guidance, as well as initial and further training and retraining, reflecting the access granted to the sponsor (Article 14(1)). This has been applied in all EU Member States, with a number of additional measures implemented across EMN Member and Observer Countries.

Certain EMN Member Countries⁴³⁶ provide vocational and/or training services in addition to the provision of vocational guidance and training indicated in the Family Reunification Directive, as well as support to access those services. In most cases, family members of third-country nationals can access the same support measures available to all, or almost all, adult learners.⁴³⁷ For example, family members have access to civic orientation in France and further education and training support in Ireland. However, access to vocational guidance and training in some EMN Member Countries⁴³⁸ depends on the residence permit issued to the family member.

Box 17: Access to vocational training in France

Vocational guidance, as part of the national integration contract, includes a personalised interview with newly arrived foreign nationals to assess their personal situation and needs and guide them towards appropriate local services. Family members admitted to France under family reunification benefit from common law provisions, which establish that lifelong training is a national obligation. The provision aims to enable everyone to acquire and update skills that will help them to develop professionally, regardless of their status. To access these courses, however, family members must be an employee or registered job seeker.

In some EMN Member and Observer Countries,⁴³⁹ support to access guidance and training is available for both refugees and beneficiaries of subsidiary protection and their family members, or to refugees and their family members only.⁴⁴⁰

427 AT, CY, FI, IE, IT, LU, SK.

428 BE (this only applies for employment; for self-employment, family members must request additional authorisation), CZ, DE, EE, ES, FI, FR, IT, LT, LU, LV (exceptions for family members of students and researchers), MT, PL, SI (only applies to family members of BIP).

429 AT, BG, CY, EL, HR, IE, NL, SE, and RS.

430 FI, FR, IT.

431 EE, FI, HR, LT, LU, SE.

432 BE, EL, HU, SI, SK.

433 This is the case in Cyprus, except for family members of EU Blue Card holders and intra-corporate transferees.

434 AT, SK.

435 As per Article 17 of the EU Blue Card Directive. This does not apply to EU Member States that are not party to the Directive (IE and DK).

436 DE, EL, FI, FR, IT, LU, SI.

437 DE, FI, FR, IE, IT, LU.

438 AT, IE.

439 LT, SK, and RS.

440 CZ



7.2. AUTONOMOUS RESIDENCE PERMIT

Under the Family Reunification Directive, it is mandatory to grant spouses, partners and children who have reached majority an autonomous residence permit no later than after five years of residence (Article 15 (1)). The overview of autonomous residence permits granted to family members of third-country nationals can be found in Annex 7.

The right to apply for an autonomous residence permit is granted to family members in all EMN Member Countries,⁴⁴¹ with varying numbers of years of residence required for the family members. Certain EMN Member and Observer Countries⁴⁴² have implemented the maximum five-year period, as per the Family Reunification Directive, but waiting periods can also vary between one⁴⁴³ and three⁴⁴⁴ years. In some EU Member States,⁴⁴⁵ different waiting periods apply depending on the residence permit of the sponsor. For example, in the Netherlands, exceptions to the waiting period apply for family members of EU Blue Card holders, who have a shorter waiting period, at two years instead of the standard five years. Certain EMN Member Countries have introduced additional conditions, for example requiring proof of integration or affinity with the country, before granting certain types of autonomous residence permits.⁴⁴⁶

Box 18: Access to autonomous residence in Austria

Under the Settlement and Residence Act, family members are not generally simply granted a derived right of residence, but, rather, an autonomous right of settlement 'of their own' (Article 27; Supreme Administrative Court, Ra 2020/22/0017). The family member has an autonomous legal right, provided that the eligibility requirements are met, and they do not lose their right of residence if the family relationship is terminated.

EU Member States must issue family members autonomous residence permits independent of the sponsor in the case of **exceptional circumstances, including widowhood, divorce, separation or death** (Article 15(3)). However, EU Member States can establish the provisions under which autonomous residence permits can be granted.

An autonomous residence permit can be granted in the case of death in all responding EMN Member and Observer Countries. Certain conditions or requirements may apply

in some countries,⁴⁴⁷ including the length of the relationship and the length of residence in the country. In Cyprus, only family members of refugees can be granted an autonomous residence permit in the case of the death of the sponsor. Ireland has no specific conditions or requirements, but a sympathetic view is taken in cases where the sponsor dies.

In the case of divorce or separation, certain countries require the family member to have a minimum number of years of residence.⁴⁴⁸ The length of residency required to apply for an autonomous residence can be shortened in the case of divorce or separation,⁴⁴⁹ and the length of the relationship between the family member and the sponsor is also considered in certain EMN Member and Observer Countries.⁴⁵⁰ Certain EMN Member Countries⁴⁵¹ also require proof of integration or affinity with the country to grant an autonomous residence permit under these circumstances.

In cases of domestic abuse or violence, EMN Member and Observer Countries can grant autonomous residence permits to family members,⁴⁵² or prohibit the withdrawal of the residence permit of the victim.⁴⁵³ In the Slovak Republic, an autonomous residence permit can only be granted through an application to change the purpose of the residence. However, the decision not to revoke temporary residence can be made in exceptional circumstances.

Type of residence permit for family members of refugees

The type of residence permit granted to the family members of refugees or holders of a similar protection status varies across EMN Member and Observer Countries.

Several EMN Member and Observer Countries⁴⁵⁴ grant residence permits to family members that are the same as that of the sponsor or grant family members a derived permit from that of the sponsor.⁴⁵⁵ In Croatia and Serbia, only minors are granted the same status as the sponsor. In Finland, family members of refugees or beneficiaries of subsidiary protection are granted the same protection status as the sponsor if the family member previously lived in the same household as the sponsor and has the same citizenship.

Where the type of residence permit issued to the family member is not the same as that of the sponsor, it is nevertheless granted for the same duration.⁴⁵⁶ Family members are also able to apply for refugee status in their own right in EMN Member Countries⁴⁵⁷ where they are not

441 All EMN Member Countries that are party to the Family Reunification Directive, as well as Ireland, are obliged to grant family members the right to apply for an autonomous residence permit.

442 BE, BG, CY, EL, FR (depending on sponsor's permit), IE, LT (for a permanent residence permit), LU, LV, MT, NL (depending on sponsor's permit), PL, SI (depending on sponsor's permit), SK.

443 DE, ES.

444 CZ, EE, FR, HR, HU, SE.

445 FR, IT, NL, SI, SK.

446 EE, FI, HU, SE.

447 BE, BG, CZ, EL, ES, FI, HR, HU, IE, LU, LV, NL, SI, and RS.

448 BG, CZ, DE, EL, ES, HR, IE, LU, MT.

449 CZ, HU, IE, LU, NL, SI, and RS.

450 EL, ES, HU.

451 FI, HU, SE.

452 AT, BE, BG, EE, EL, ES, FI, HU, IE, IT, LU, NL, SE, SI, and RS.

453 BE, CY, CZ, FR, SK.

454 CY, CZ, ES, HR.

455 BG, CZ, DE, EE, FR, IE, IT, LT, LV, MT, NL, SI, SK.

456 DE, EE, FI (so-called fixed-term residence permit), LT.

457 BE, EE, EL, HU, LT, LU, SE.

automatically granted such status in their own right or are not granted a derived permit.



7.3. ADDITIONAL RIGHTS

Following family reunification, EMN Member and Observer Countries can grant family members access to other rights in addition to education, employment and self-employment, and vocational training and guidance. The full overview of access to additional rights is mapped in Annex 8.

Healthcare

Several EMN Member Countries reported granting access to healthcare either under the same conditions as their citizens⁴⁵⁸ or all third-country nationals.⁴⁵⁹

Access to healthcare can be more favourable for certain groups of family members in some EMN Member Countries, for example minors⁴⁶⁰, family members of BIP⁴⁶¹ or family members of refugees only,⁴⁶² compared to access for other third-country nationals. In Finland, access to healthcare is based on the residence permit of the sponsor.

In certain countries, national health insurance systems will provide healthcare coverage for third-country nationals and their families under certain conditions (e.g. Estonia)⁴⁶³. In systems funded by social security contributions from employers and employees, family members will only have access to emergency healthcare. In these cases, the family member will need to make the financial contributions that are required by all citizens and will generally be required to provide proof of insurance upon arrival. Family members may also be required to register with a private health insurer when registering upon arrival.⁴⁶⁴ In Latvia, family members must provide proof of health insurance when receiving a residence permit.

In France, all foreign nationals working and/or residing in France on a regular basis are covered by the French social security system. Throughout their lives, in the event of sickness or maternity, they benefit from state subsidies for their healthcare costs from the Universal Healthcare Protection Scheme. People in employment have a health insurance scheme paid for in part by their employer. For those who do not work, or who have limited income, complementary health insurance is available subject to a means cap.

Social benefits

Several EMN Member Countries⁴⁶⁵ grant access to social benefits to family members under the same conditions as their citizens or all third-country nationals.⁴⁶⁶

Access to social assistance in Austria depends on whether family members were resettled under the Settlement and Residence Act, where access is granted after a certain number of years of residence, or under the Asylum Act, where access depends on the protection status. In Czech Republic, people with long-term residence for the purpose of family reunification are eligible for certain social assistance benefits, including parental benefits, child support, and housing benefit.

Access to social assistance may be granted for family members of BIP in Ireland, Germany, Finland (social housing) and the Netherlands, and sponsors with specific permits in Latvia.⁴⁶⁷ In the Slovak Republic, family members of sponsors with refugee status or subsidiary protection status are eligible for a one-time or recurring financial support to facilitate their initial integration.

In Italy, local level support services are commonly available for family members, including social and psychological support, delivered by either the local public administration or civil society organisations.

Housing and social housing

In France, access to housing and social housing for family members of third-country nationals is provided based on specific criteria. Two EMN Member Countries⁴⁶⁸ provide or grant priority access to social housing for BIP and their family members. Greece provides support to access housing in cases of family reunification.

In Finland and the Netherlands, third-country nationals who enter the country through family reunification are granted certain rights to support housing and access social housing. These rights and the extent of the access can vary based on the individual's specific status. BIP are often given priority in social housing allocations to facilitate their integration.

458 BE, CY, EE, EL, ES, FI, NL, SK.

459 FR, IT, LT, SE, SI.

460 CZ.

461 HR, IE. In Ireland, family members are normally required to present private health insurance, but families of BIP have an automatic right to social healthcare, similar to Irish citizens.

462 EL.

463 Healthcare is provided through the Estonian health insurance system if the family member is engaged in work or study, received an unemployment benefit, is pregnant or under 19 years of age, or receives a state pension granted in Estonia. A residence permit does not automatically grant access to healthcare.

464 IE, LT, LV, NL.

465 CY, EE, FI, SI.

466 EE, ES, FI, FR, IT, SE, SK.

467 Those entitled to social benefits in Latvia include third-country nationals and family members with a permanent residence permit (including persons with refugee status) or third-country nationals and family members with a temporary residence permit if the sponsor has been granted alternative status (BIP) or if the sponsor is an EU Blue Card holder.

468 NL, SK.



7.4. LONG-TERM RESIDENCE OR NATURALISATION

Family members can apply for long-term residence or obtain citizenship through naturalisation in all responding EMN Member and Observer Countries, as per national legislation. Applications can usually be submitted after a certain number of years of continuous residence, ranging from three to five years for long-term residence⁴⁶⁹ and 5 to 10 years for citizenship through naturalisation.⁴⁷⁰

In certain EMN Member Countries,⁴⁷¹ the required years of residence to obtain long-term residence can be lower for the family members of a third-country national, compared to a third-country national who is not residing in the country, for family reunification purposes. This can also be the case for family members of third-country nationals holding specific residence permits.⁴⁷² For example, in the Slovak Republic, the number of years of residence required to apply for long-term residence is lower for family members of BIP compared to family members of other third-country nationals.

Box 19: Access to permanent residency in Luxembourg

In Luxembourg, for family members of EU Blue Card holders, the number of years required to obtain the autonomous residence permit can consist of accumulated periods of residence in different EU Member States. If the family member has lived in one or more EU Member States within the five years prior to their residence application, these periods will count towards fulfilling the five-year residence requirement.

In recent years, Finland and the Netherlands have increased the minimum required years of continuous residence for all categories of third-country nationals applying for naturalisation. In Finland, the Nationality Act introduced in October 2024 increased the minimum required years of residence from five to eight years. Similarly, in the Netherlands, a government programme introduced in August 2024 proposes to increase the required years of residence for naturalisation from 5 to 10 years.



7.5. CHALLENGES AND GOOD PRACTICES

Key lessons can be drawn from the challenges faced by family members in EMN Member and Observer Countries in accessing the associated rights, including the solutions put in place by national authorities and good practices that have emerged.

Challenges

Across EMN Member and Observer Countries, family members of third-country nationals face challenges in accessing the rights to which they are entitled.

Sponsors and family members commonly face problems with **bureaucratic processes** that can be particularly challenging upon their arrival and during their initial residence in the host country.⁴⁷³ Registration with local authorities has proven to be slow or delayed in some cases. This can become a challenge when registration is mandatory to access the rights to which family members are entitled.⁴⁷⁴ Challenges have also emerged due to a lack of knowledge about family reunification processes across local authorities and delays in the registration of family members.⁴⁷⁵

Finding **housing and accommodation** can be an obstacle for family members of third-country nationals.⁴⁷⁶ In France, where the right to social housing is guaranteed to any person residing in the country, families often face challenges finding accommodation suitable for the size of the family prior to their arrival and can often find

themselves in precarious housing situations. NGOs in Ireland flag a significant challenge for families in accessing housing, resulting in some arriving into a situation of homelessness. This is primarily due to delays in issuing Personal Public Service Numbers (PPSNs) to facilitate bureaucratic steps.

Bulgaria reported challenges in **accessing services**, where two main routes to family reunification exist: reunification through the Law on Asylum and Refugees; or through the Law on Foreigners in the Republic of Bulgaria. Under the latter, family members do not have the same legal rights in respect of access to services, such as healthcare and social benefits, resulting in two competing regimes.

Accessing autonomous residence permits can present a significant challenge for family members.⁴⁷⁷ In the Netherlands, personal challenges include unhealthy dependencies developing between the family member(s) and the sponsor in these situations. Some EMN Member Countries note that the issue can be exacerbated by time-limited access to rights or integration schemes, for example in situations of domestic violence.⁴⁷⁸

Certain EMN Member Countries⁴⁷⁹ identified key **social and labour market integration challenges** faced by family members. In Austria, challenges were reported in the context of family reunification with BIP, particularly in the first weeks and months. For example, the initial

469 For example, the minimum years of continuous residence required for family members applying for permanent residency is: three years: DE, HR, HU, SE; four years: FI; five years: AT, CY, CZ, EL, ES, IT, LT, LU, LV, NL, SK. In all cases, specific conditions can be and/or are applied, depending on national legislation.

470 For example, the minimum years of continuous residence required for family members applying for citizenship through naturalisation is: five years: BE, CZ, DE, IE, LU; eight years: EE, HU; 10 years: AT, IT, LT, SK. In all cases, specific conditions can be and/or are applied, depending on national legislation.

471 HR, HU.

472 IT, NL, SK.

473 AT, ES, FI, FR, IE, IT.

474 FI, FR.

475 EL, FI, FR, IE.

476 DE, FR, IE, LU.

477 FI, FR, IE, NL.

478 FI, FR.

479 AT, DE, IE, SI.

orientation and bureaucratic steps can be a challenge, and family members without German language proficiency can find these tasks particularly difficult. Sponsors who are in the initial stage of their own integration process can offer only limited support and even then, may hinder their own integration.

Delays in issuing Personal Public Service Numbers (PPSN) in Ireland creates challenges in the social and labour market integration of family members. Notably, it has raised problems for children accessing primary and secondary level education, with waiting periods of over two months in some cases before a child can be registered with a school. A lack of communication and coordination between actors in Ireland was also reported, both in terms of long-term social supports and housing and in access to emergency accommodation and other services immediately on arrival.

In terms of **education**, stakeholders in Luxembourg indicated high demand for places in secondary education institutions has resulted in not enough places available for the placement of newly arrived children of the age of 12 and above. Costs associated with accessing language courses in Austria can also reportedly be a challenge for family members in cases of family reunification under the Settlement and Residence Act. Finally, in Slovenia, family members can struggle to access **employment** due to a lack of structured training to gain comprehensive skills and no recognition of informal learning.

Good practices

Several examples of good practice were identified by EMN Member and Observer Countries⁴⁸⁰ in integration measures, the provision of education, access to the labour market and vocational guidance and training, and the right to autonomous residence for family members of third-country nationals.

Five EMN Member and Observer Countries⁴⁸¹ have implemented practices applicable to all third-country nationals that also support family members granted family reunification to **access their rights**. In Italy, pre-departure integration programmes help people to understand bureaucratic application processes before their arrival and start the integration process as soon as the family reunification request is granted. **Early integration support** via a one-stop-shop service provided at the initial phase in Latvia, and individual offerings of orientation projects in Austria are also beneficial in supporting the long-term integration of family members. For example, the projects '*Startbegleitung für Asyl- und subsidiär Schutzberechtigte*' and the pilot project '*StartWien Hub*' provide support to family members after their arrival in Austria. In the framework of the latter project, the family members of recognised refugees are supported by educational and advisory services over a period of six months with the objective of helping them to settle in the country in a purposeful and resource-efficient manner.

Specialised support for third-country nationals, including family members, facilitates access to education, vocational guidance and training, particularly specialised language training, in-education and integration support,

and financial support for language lessons.⁴⁸² In Luxembourg, a dedicated school integration and welcome service facilitates information provision on education to newly arrived pupils and parents. In Serbia, a programme for teachers in primary and secondary school to support foreign students helps to support third-country national minors more broadly, including those who arrive through family reunification.

EMN Member Countries highlighted the importance of **granting different rights to family members** to enhance their overall integration and well-being. France and Latvia reported the benefits of free access to the labour market and vocational training as facilitating access to employment and the overall integration of family members. A similar effect was witnessed following the abolition of the labour market test in Luxembourg. Several relevant stakeholders in Ireland reported allowing access to the labour market for certain family members as a good practice.

France reported positive effects in **mirroring the benefits** granted to different groups of third-country nationals and their family members. For example, family members of beneficiaries of subsidiary protection are granted the same rights as family members of refugees residing in France. This is also the case in Ireland. Finally, Lithuania has simplified access to permanent residence by broadening the scope of justifications for absence from the country or other EU Member States, provided that the third-country national's permanent place of residence continues to be in Lithuania.

Box 20: Support for the integration of family members after reunification in the host country⁴⁸³

In **Spain**, support to family members is provided by the international protection reception system, managed by the Ministry of Inclusion, Social Security and Migration. It involves a two-phase support scheme, transitioning from government-provided shelter and assistance to preparation for self-reliance, with conditional financial support throughout. The support and services provided include accommodation and support through structured programmes such as cultural orientation, language courses and preparation for employment during the temporary reception phase, and rented accommodation, financial assistance, language training, jobseeker support and job readiness support during the second phase.

In **France**, the AGIR programme provides support for BIP during the family reunification process (depending on the location of the programme). Once the family is reunited, family members receive assistance with certain administrative procedures, such as applying for social housing. However, this support is only available to families in which the BIP is already a beneficiary of AGIR, i.e. not all BIP and their families receive the same level of support, and many must rely on non-specialised services.

The Netherlands has a decentralised integration system, with municipalities responsible for the

480 AT, CZ, FR, IT, LV, and RS.

481 CZ, IE, IT, LV, and RS.

482 AT (including federal state vouchers for German language courses), CZ, IE, LU.

483 This box presents an analysis of the inputs gathered via a questionnaire submitted to IOM, UNHCR and Red Cross EU Office, as explained in the disclaimer of this study.

integration of BIP and their family members. Upon arrival in the Netherlands, the municipality assigns a counsellor to individual family members to identify integration needs that take various aspects into consideration, such as family dynamics, healthcare needs, skill levels, and any specific needs of mothers. There are also modalities to support working and studying at the same time. Similarly, in Sweden, there is no dedicated work to support family reunification, but some municipalities have integration officers who assist the family reunification process.

The city of Milan in Italy introduced a protocol in 2020 to streamline the family reunification procedure for third-country nationals residing in the city. It also offers support in administrative procedures, as well as support to access language courses, integration and education services, and school orientation. The initiative is funded by the Ministry of Labour and Social Policy.

As part of the AMIF-funded REPAIR project (2022–2025), needs assessments were conducted in Austria, France, Slovenia and the UK, highlighting the challenges faced by families upon arrival. The results of the assessment were published in 2024. In France, significant challenges persist in relation to regularisation, access to social benefits (e.g. family allowances, health coverage) and accommodation. Delays in obtaining social housing are common, and families can usually only apply once they are physically present in the country – anticipating this process before arrival is rare and depends on local policies. Additional obstacles include schooling, access to training and employment, and psychological support after years of separation. These administrative difficulties can stem from authorities' lack of awareness of the rights associated with this special status, as well as the absence of a structured guidance mechanism to help reunited families to navigate the various administrative steps. The complexity of the arrival process can

vary significantly depending on whether the family has support from a social worker who can assist them in understanding and completing the necessary procedures.

The Red Cross-National Societies seek to assist newly arrived families in several EMN Member and Observer Countries,⁴⁸⁴ with staff, volunteers, and local branches offering activities such as language learning, support in accessing employment and schooling, and, occasionally, assistance with housing or related expenses. According to the Norwegian Red Cross, integration and individual needs are better addressed in municipalities in Norway, where reunited families are offered free **family counselling**. In several places in Norway, the Norwegian Red Cross provides activities for families with migrant backgrounds, including reunited families. Many family members also take part in social inclusion activities such as language learning and the refugee buddy programmes of the Norwegian Red Cross. As part of the language learning activities offered across the country, the Norwegian Red Cross covers topics such as mental health, understanding Norwegian society, diversity, and, in some locations, employment.

The Austrian Red Cross has launched the *FamilienTreffen* project as an integration support initiative for reunited refugee families. Families receive professional integration counselling and support from Red Cross volunteers. The Irish Red Cross is implementing a national programme 'Mental Health, English Language, Employment Skills and Family Reunification' that assists with employment and language skills support for all migrants, including reunited families. While the importance and impact of integration services is well-established, the Red Cross EU Office noted that several EMN Member and Observer Countries lack any state-led integration programmes, resulting in family members struggling to access support programmes.

484 AT, IE, and NO.

8. CONCLUSIONS

This study, covering the period up until February 2025, provides a comprehensive overview of how EMN Member and Observer Countries implement national laws and policies on family reunification, including the Family Reunification Directive, 20 years after its adoption. Covering 23 EMN Member Countries and one EMN Observer Country (Serbia), the study maps current approaches, including the applicable legal and policy frameworks, eligibility criteria for sponsors and family members, conditions for exercising the right to family reunification, and procedural aspects of applying for family reunification. It examines the access to rights and possibility for long-term residence or naturalisation following the granting of family reunification.

Several conclusions can be drawn from the study:

- **Between 2017 and 2025, the scope of who can be a sponsor for family reunification in EMN Member and Observer Countries has broadened and become more harmonised.** While already in 2017, most countries allowed third-country national sponsors with valid residence permits and those granted international protection to act as sponsors, by 2025 this has become standard practice across all EMN countries, including for those holding temporary residence. Notable changes also occurred in the treatment of specific family members. Access for beneficiaries of subsidiary protection has also expanded. Whereas in 2017 access for this group varied—with some Member States applying waiting periods or specific limitations—by 2025, most countries permit beneficiaries of subsidiary protection to sponsor family members under the same conditions as refugees. With regard to parents, whereas some Member States previously excluded them entirely unless the sponsor was an unaccompanied minor, by 2025 more countries allow reunification in cases of proven dependency, often linked to health, financial, or social factors. Similarly, family reunification with adult children, once highly restricted and generally limited to cases of disability or dependency, is now permitted under specific conditions in the majority of countries, though implementation still varies. Recognition of same-sex partners has also advanced: while in 2017 a few Member States did not acknowledge same-sex partnerships for reunification purposes, by 2025 the majority of EMN Member Countries recognise registered same-sex partnerships or marriages as equivalent to heterosexual unions, although exceptions remain in a limited number of states. Overall, the trend has been toward more inclusive definitions of family and sponsor eligibility, though with continued divergences in national practices.
- In terms of requirements, countries have increasingly formalised and standardised the requirements for family reunification, particularly regarding accommodation, health insurance, financial resources, and integration. While many of these requirements already existed in 2017, by 2025 more countries specify detailed criteria—such as minimum housing space, hygiene standards, and income thresholds—often with inspections or documentation. Exemptions for refugees and, where applicable, for beneficiaries of subsidiary protection have become more widespread. Financial requirements now more often consider future income or family member contributions, and humanitarian exemptions are more systematically applied. Integration measures are now required in a growing number of countries, either before or after arrival, including language proficiency and civic integration linked to residence permits. This reflects a broader shift toward clearer, more conditional access, with increased differentiation based on status and application timing.
- **Recent and planned legal and policy changes demonstrate a dual trend of facilitating family reunification for skilled migrants while introducing more restrictive measures for other categories.** Legal and policy reforms increasingly focus on attracting high-skilled labour by easing family reunification processes, including immediate labour market access for family members and digitalised applications. Planned reforms in several Member States suggest a trend towards tightening access to family reunification, especially for beneficiaries of subsidiary protection, with the implementation of restrictive measures such as waiting periods, reduced eligibility for extended family members, and stricter documentation requirements.
- **The definition of eligible family members differs considerably between EMN Member and Observer Countries, with nuclear family members granted family reunification, but eligibility of extended family members depending on national legislation and specific conditions.** Unlike nuclear family members, family reunification for adult children, parents, non-married or same-sex partners, and other dependent relatives often requires proof of dependency, health conditions, or humanitarian considerations. This variation results in differing levels of access to family reunification.
- **Requirements related to accommodation, financial resources, and sickness insurance remain**

core conditions for family reunification across EMN Member and Observer Countries, but their application varies significantly, depending on the sponsor's status and national frameworks.

While these requirements are broadly implemented among EMN Member and Observer countries, a range of exemptions exist, particularly for refugees, beneficiaries of subsidiary protection, and highly skilled migrants, reflecting efforts to balance migration management with humanitarian and economic considerations.

■ **Waiting periods, integration conditions, and income thresholds are identified as obstacles in practice for sponsors and their families.**

In several countries, meeting the financial and accommodation requirements can be particularly challenging due to high income thresholds, strict documentation demands, and rising housing costs. Sponsors often face delays or denials when required to provide evidence of stable income over extended periods, with limited flexibility for those in short-term employment. Integration measures such as pre-departure language exams or post-arrival civic integration requirements can also create barriers, especially for vulnerable groups such as women or older family members.

■ **Application procedures and submission methods for family reunification vary between countries, depending on the status of the sponsor and the applicant, and may involve either in-country or consular processes.**

In some EMN Member and Observer Countries, the application is lodged by the sponsor, while in others it must be submitted by the family member, typically through diplomatic missions abroad. Exceptions apply in cases involving BIP, minors, or highly skilled workers, where more flexible or facilitated procedures may be available. Some countries allow third-party representation or online applications, although access to these options remains uneven. These procedural differences can affect how quickly and efficiently applications are submitted and processed, particularly when family members are located in regions with limited consular access.

■ **Requirements for documentation to prove identity and family ties are generally based on civil status documents, but countries provide alternative means of verification where such documents are unavailable.**

While marriage and birth certificates are the standard forms of proof, countries typically also accept alternative evidence such as personal interviews, DNA testing,

or witness statements, especially in cases involving refugees or stateless persons who may not have access to official documents. However, practices vary significantly between countries regarding the thresholds and procedures for accepting such alternative evidence. The use of verification mechanisms such as interviews at consulates or cross-checks with national authorities may add time and complexity to the process, especially in contexts where diplomatic presence is limited.

■ **Fees and associated costs for family reunification procedures differ significantly, with some exemptions for specific categories such as minors or BIP, but financial burdens remain a barrier in many cases.**

Application fees vary considerably, with additional costs for visas, translations, document legalisation, and DNA testing often borne by the applicant. Although some EMN Member Countries offer reduced or waived fees for children, low-income applicants, or refugees, such exemptions are not consistently applied and may require additional documentation or formal requests.

■ **Access to core rights such as education, employment, vocational training and healthcare is broadly guaranteed across EMN Member and Observer Countries, but differences in implementation and eligibility criteria may affect practical access for family members.**

While all countries provide formal access to compulsory education and basic healthcare, access to employment, vocational training, and higher education may depend on the legal status of the sponsor, the type of residence permit issued, or the category of third-country national. Additional barriers, such as limited recognition of foreign qualifications, language requirements, or administrative delays, may hinder access in practice.

■ **The right to obtain an autonomous residence permit is generally respected across countries, but waiting periods, additional requirements, and exceptions in cases of vulnerability vary considerably.**

Most countries permit family members to apply for independent residence status after five years, as required under the Family Reunification Directive, with some offering shorter waiting periods for BIP. However, access to autonomous residence in situations of divorce, death, or domestic violence often depends on discretionary conditions, such as length of cohabitation or integration criteria.

ANNEXES

ANNEX 1: First permits for family reasons submitted, issued and rejected, by country⁴⁸⁵

| EMN Member Country | 2018 | | | 2019 | | | 2020 | | | 2021 | | |
|--------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|
| | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected |
| BG | n/a | 8 | n/a | n/a | 7 | n/a | n/a | 6 | n/a | n/a | 9 | n/a |
| FI | 7 625 | 6 106 | 1 508 | 8 449 | 7 034 | 1 848 | 5 992 | 5 786 | 1 234 | 10 574 | 7 529 | 837 |
| IT | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| LV | 139 | 138 | 1 | 139 | 137 | 2 | 115 | 112 | 3 | 130 | 126 | 4 |
| LU | 1 908 | 1 839 | n/a | 2 018 | 2 097 | n/a | 1 647 | 1 580 | n/a | 2 804 | 2 402 | 163 |
| PL | 11 978 | 10 688 | 1 054 | 19 846 | 14 954 | 2 222 | 18 694 | 16 481 | 1 941 | 29 142 | 21 616 | 1 736 |

| EMN Member Country | 2022 | | | 2023 | | | 2024 | | |
|--------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|
| | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected |
| BG | n/a | 26 | n/a | n/a | 24 | n/a | n/a | 20 | n/a |
| FI | 15 602 | 12 214 | 836 | 18 364 | 16 970 | 890 | 20 629 | 15 258 | 1 297 |
| IT | n/a | n/a | n/a | 140 270 | 135 734 | 4 536 | n/a | n/a | n/a |
| LV | 165 | 150 | 15 | 115 | 110 | 5 | 108 | 100 | 8 |
| LU | 3 393 | 2 797 | 108 | 3 193 | 2 586 | 188 | 2 421 | 2 529 | 228 |
| PL | 34 911 | 25 269 | 1 859 | 41 828 | 29 957 | 1 428 | 61 570 | 30 439 | 1 830 |

⁴⁸⁵ The data were reported by seven EMN National Contact Points: Bulgaria, Finland, Italy, Latvia, Luxembourg and Poland.

ANNEX 2: First permits for family reasons submitted, issued and rejected, by country and sex⁴⁸⁶

| EMN Member Country | Sex | 2018 | | | 2019 | | | 2020 | | | 2021 | | |
|--------------------|-------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|
| | | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected |
| BG | Women | n/a | 7 | n/a | n/a | 6 | n/a | n/a | 6 | n/a | n/a | 9 | n/a |
| | Men | n/a | 1 | n/a | n/a | 1 | n/a | n/a | 0 | n/a | n/a | 0 | n/a |
| FI | Women | n/a | 3 805 | 873 | n/a | 4 400 | 1 052 | n/a | 3 457 | 706 | n/a | 4 538 | 461 |
| | Men | n/a | 2 301 | 634 | n/a | 2 634 | 796 | n/a | 2 329 | 528 | n/a | 2 990 | 376 |
| IT | Women | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| | Men | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| LV | Women | 70 | 69 | 1 | 73 | 73 | n/a | 66 | 65 | 1 | 68 | 66 | 2 |
| | Men | 69 | 69 | n/a | 66 | 64 | 2 | 49 | 47 | 2 | 62 | 60 | 2 |

| EMN Member Country | Sex | 2022 | | | 2023 | | | 2024 | | |
|--------------------|-------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|------------------------|----------------|-----------------------|
| | | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected | Applications submitted | Permits issued | Applications rejected |
| BG | Women | n/a | 19 | n/a | n/a | 7 | n/a | n/a | 15 | n/a |
| | Men | n/a | 7 | n/a | n/a | 17 | n/a | n/a | 5 | n/a |
| FI | Women | n/a | 7 110 | 486 | n/a | 9 244 | 484 | n/a | 7 952 | 704 |
| | Men | n/a | 5 103 | 350 | n/a | 7 726 | 406 | n/a | 7 306 | 593 |
| IT | Women | n/a | n/a | n/a | 76 644 | n/a | 2 081 | n/a | n/a | n/a |
| | Men | n/a | n/a | n/a | 63 626 | n/a | 2 455 | n/a | n/a | n/a |
| LV | Women | 80 | 72 | 8 | 64 | 59 | 5 | 50 | 47 | 3 |
| | Men | 85 | 78 | 7 | 51 | 51 | n/a | 58 | 53 | 5 |

Annex 3: Approaches to distinguishing family formation and reunification

| EMN Member Country | Distinguishing family formation and family reunification |
|--------------------|--|
| AT | There is no residence permit for the specific purpose of family formation. Under the Settlement and Residence Act, family reunification is possible even if the marriage or registered partnership was only contracted after the sponsor entered Austria, whereas under the Asylum Act, a marriage or registered partnership must have been contracted before the sponsor first entered Austria |
| BE | The law distinguishes via different age requirements (21 for family formation vs 18 for pre-existing relationships). Family members of BIP are exempt from material conditions only if the relationship existed before arrival and the application is filed within one year |
| CY | Family reunification permit holders receive benefits such as health coverage, while family formation beneficiaries have more limited benefits |
| CZ | Family formation applies when a person wants to form/start a family with a foreigner who has a residence permit in the country. In contrast, family reunification is for specific family members who are joining a family unit that already exists or has existed previously, allowing them to be together in the Czech Republic. |

⁴⁸⁶ The data were reported by seven EMN National Contact Points: Bulgaria, Finland, Italy, Latvia, Luxembourg and Poland.

| EMN Member Country | Distinguishing family formation and family reunification |
|--------------------|---|
| FI | <p>Family formation or a new family member refers to a situation where the family tie between the family member and the sponsor residing in Finland arises after the entry of the sponsor into Finland. Family formation is also the case in situations where a sponsor entering Finland as a quota refugee has been accepted by Finland as part of the refugee quota, but they have not yet entered Finland, and the family is formed after the sponsor's selection in the refugee quota or the issuance of the residence permit. Family formation also applies to situations where the sponsor has previously been married to his or her current spouse and a residence permit is applied for on the basis of a new marriage concluded after entry into Finland.</p> <p>Family reunification, or a pre-existing family member, in turn, refers to a family tie between a sponsor and a family member that existed before the sponsor entered into Finland. If a child is born to a sponsor and his or her spouse who is a pre-existing family member after the sponsor has entered Finland, the child is considered a pre-existing family member.</p> |
| FR | <p>France has different rules depending on whether a third-country national has family ties before or after entering France. Where family ties pre-date entry into France, French law applies the family reunification and family reunification of BIP provisions.</p> <ul style="list-style-type: none"> ■ In accordance with Article L. 434-2 of the Code on Entry and Residence of Foreign Nationals and Right of Asylum⁴⁸⁷ (CESEDA), when a third-country national who has been legally residing in France for at least eighteen months has family ties (spouse and minor children of the couple) before entering France, they may apply to be joined by them under family reunification, provided they meet the conditions defined in Article L. 434-7 of the CESEDA (stable and sufficient means to support their family, housing considered normal for a comparable family living in the same geographical area and compliance with the essential principles that, according to the laws of the Republic, govern family life in France). ■ In accordance with Article L. 561-2 of the CESEDA, when the third-country national BIP had family ties before they submitted their application for asylum in France, they may benefit from their right to be joined under the family reunification of BIP by the family members defined in that article. <p>Where family ties exist after entry into France, French law lays down specific rules to enable third-country nationals residing legally in France to form a family.</p> <p>In accordance with Article R. 434-6 of the CESEDA, by exception to the submission procedure, family reunification may also be granted to the spouse of a sponsor who legally resides in French territory, under a temporary residence permit or a multi-year residence permit, provided that the marriage took place in France.</p> <ul style="list-style-type: none"> ■ In accordance with Article L. 424-11 of the CESEDA, where a third-country national who has been granted subsidiary protection has entered into a marriage or civil union in France with a third-country national after they have lodged an application for asylum, their spouse or partner will be issued with a multi-year residence permit marked as 'family member of a beneficiary of subsidiary protection', provided that they can prove that they have been married or in a civil union for at least one year, that they are actually living together and that they are legally resident in France.⁴⁸⁸ ■ In accordance with Article L. 424-3 of the CESEDA, where a third-country national who has been recognised as a refugee has entered into a marriage or civil union in France with a third-country national after he or she has lodged his or her application for asylum, this spouse or partner will be issued with a ten-year residence permit, provided that he or she can prove that he or she has been married or in a civil union for at least one year, and that the spouses or partners have actually lived together.⁴⁸⁹ ■ When a third-country national BIP has married in France after they have submitted their application with a third-country national but the conditions set forth in Articles L. 424-11 and L. 424-3 of the CESEDA are not met, the entry into France of their spouse is subject to the family reunification system as defined in Article L. 434-2 of the CESEDA. ■ Article 2 of the Law of 10 September 2018 authorised the residence of irregular parents of a third-country national minor who has been recognised as a refugee under a valid ten-year residence permit allowing the exercise of a professional activity during this time.⁴⁹⁰ Until this law, the issuance of the ten-year residence permit was subject to a condition of regular residence in France.⁴⁹¹ It was thus a matter of extending protection given to a refugee to their close relatives to allow them to lead a normal family life and provide them with full and complete protection under the principle of family unity.⁴⁹² |
| IE (for BIP) | <p>Ireland only distinguishes between family formation and family reunification for BIP. Sections 56 and 57 of the International Protection Act 2015 require BIP applying for family reunification under the Act to demonstrate that marriages and partnerships were established before an application for international protection in Ireland was lodged. There is no family reunification in case of family formation.</p> |

⁴⁸⁷ Code on Entry and Residence of Foreign Nationals and Right of Asylum, https://www.legifrance.gouv.fr/codes/texte_lc/LEGITEXT000006070158/, accessed 25 September 2025.

⁴⁸⁸ Article L. 424-11 of the CESEDA.

⁴⁸⁹ Article L. 424-3 of the CESEDA.

⁴⁹⁰ Defender of Rights, reform document no. 30 regarding the report on the rights of family members of foreign nationals, July 2023, https://juridique.defenseurdesdroits.fr/doc_num.php?explnum_id=21988

⁴⁹¹ Info on foreign nationals' rights regarding the rights of BIP <https://www.info-droits-et-rangers.org/sejourner-en-france/lasile/droits-beneficiaires-dune-protection-internationale/>

⁴⁹² EMN France, Family reunification of third-country nationals in France, January 2017, p. 38, <https://www.immigration.interieur.gouv.fr/content/download/101782/802217/file/Etude-regroupement-familial-vers-sept2017.pdf>

| EMN Member Country | Distinguishing family formation and family reunification |
|-----------------------------|--|
| LT (only with an exception) | Family reunification includes relationships formed both before and after arrival, with an exception for sponsors with temporary residence based on long-term resident status in another EU Member State. In this case, family reunification is permitted only if the family was already established there; otherwise, under the general procedure, sponsors must have lived in Lithuania for two years, possess a residence permit valid for at least one more year, and demonstrate reasonable prospects for permanent residency. |
| MT | Sponsors apply for family reunification while their dependents with family members are abroad. There are cases of family formation where the dependents' previous residence status may also affect the process. |
| NL493 | While there is a formal distinction based on Article 9(2) of the Directive, the same conditions and rules apply to both categories. For BIP, only family reunification (not family formation) is possible under favourable conditions applicable to applications lodged within three months of granting of asylum. Family formation is not possible because this implies that the family did not exist prior to coming to the Netherlands and thus was not separated resulting by the migration process. |
| SI (for BIP) | <p>Slovene legislation differentiates whether an existing (already formed/established) family relationship with the beneficiary of international protection (hereinafter: BIP) – sponsor, arose before or after the entry of the sponsor in the country.</p> <p>Article 47a of the Foreigners Act (hereinafter: ZTuj-2) applies to the family reunification of foreigners with granted refugee status in the Republic of Slovenia (hereinafter: refugee), providing their family relationship existed before the sponsor entered the Republic of Slovenia.</p> <p>Article 47b ZTuj-2 applies to the family reunification of a foreigner with granted subsidiary protection in the Republic of Slovenia (hereinafter: beneficiary of subsidiary protection), providing their family relationship existed before the sponsor entered the Republic of Slovenia</p> <p>If the family relationship with the BIP (either refugee or beneficiary of subsidiary protection) arose after the BIP entered the Republic of Slovenia, the general provisions for family reunification of third country nationals otherwise set in Article 47 ZTuj-2 shall apply regarding the issuance of a residence permit for the purpose of family reunification.</p> |

Annex 4: Amount of minimum income requirement, by country

| EMN Member Country | Income requirement |
|--------------------|--|
| AT | €1 217.96 per month for single person €1 921.46 for spouses or registered partners living in the same household, increased by €187.93 for each minor child (2024) |
| BE | €2 131.28 net/month (as of 1 February 2025). There is no different income requirement depending on the type and numbers of family members being reunited |
| CY | As set by the provisions of the Aliens and Immigration Law, the applicant should have and demonstrate sufficient funds to sustain family living in the country thus preventing dependence on the national social welfare system |
| CZ | CZK 4 470 (€180) per month for a person who is assessed first in a joint application The monthly amount for person who is assessed second or next in order in a joint application is: <ul style="list-style-type: none"> ■ CZK 4 040 (€161) for a person 15 years of age or older who is not a dependent child ■ CZK 3 490 (€139) for a dependent child aged between 15 and 26 years ■ CZK 3 050 (€122) for a dependent child aged 6 to 15 years ■ CZK 2 480 (€99) for a dependent child under 6 years of age |
| DE | Sufficient financial means are available when there is no claim to social support according to Book II and XII <i>Sozialgesetzbuch</i> (Social Security Statute Book). This varies depending on the size of the family and the age of the children. |
| EE | The minimum income is set at twice the subsistence level As of 1 June 2022, the subsistence level is €200 per month for a single person or the first family member (€400 when doubled), and €160 for each additional adult (€320 when doubled), and €240 for each minor (€480 when doubled) |
| EL | Legal migration: €830.00 a month for employees (minimum wage 2024) €37.07 a day for manual workers (minimum daily wage 2024) |

493 Currently, NL does not distinguish between refugees and beneficiaries of subsidiary protection and applies the same rules to both categories.

| EMN Member Country | Income requirement |
|--------------------|--|
| ES | <p>Regular income in Euro, or in foreign currency equivalent, at 150% of the <i>Indicador Público de Renta de Efectos Múltiples</i> (IPREM),⁴⁹⁴ including the sponsor and one reunited family member, and 50% of the IPREM for each additional member.</p> <p>The amount to be justified for a family unit of two members, one of whom is a minor, will be 110% of the IPREM on an annual basis and, for each additional minor, an additional 10% will be required.</p> |
| FI | <p>The amount depends on the municipality of residence and the composition of the family</p> <p>Example:</p> <ul style="list-style-type: none"> ■ First adult: €1 030-€1 210/month ■ Second adult living in the same household: €520-€610/month ■ First minor family member: €520-€610/month ■ Second minor family member: €410-€480/month ■ Third minor family member and each subsequent minor family member: €310-€360/month ■ An adult child who lives with the family and is financially dependent: €610/month |
| FR | <p>An amount equal to the French gross national minimum wage (SMIC) for a family of two or three persons. It is increased according to the number of family members (by one-tenth for a family of four or five persons, and one-fifth for a family of six or more). The gross monthly amount is €1 801.80 based on a 35-hour workweek, with a gross hourly rate of €11.88. The net monthly minimum wage is €1 425.67, with a net hourly rate of €9.40</p> <p>No income requirement in the case of family reunification of BIP.</p> |
| HR | <p>At least 50% of the average monthly net salary paid in the previous year. For a two-member family, the amount is increased by 15%, and for each additional family member or life partner (formal or informal), the amount is increased by an additional 10% of the average monthly net salary paid in the previous year</p> <p>In 2024: €574.00 for a single applicant, €746.20 for a two-member family, €861.00 for a three-member family, €975.80 for a four-member family, €1 090.60 for a five-member family, and the amount increases by €114.80 for each additional family member</p> |
| HU | <p>Sufficient financial means are required to cover housing and living expenses, as well as travel expenses for the entire duration of their stay in Hungary, as well as for the support of minor children</p> <p>The exact amount is not specified in the legislation</p> |
| IE | <p>If the sponsor is an Irish citizen, they must, over the three-year period prior to the application, have earned a cumulative gross income over and above any state benefits of not less than €40 000 (i.e. €13 500 per year for three years, not €40 000 for three years)</p> <p>Where the sponsor is a non-EEA national:</p> <ul style="list-style-type: none"> ■ For category A sponsors,⁴⁹⁵ they are entitled to family reunification immediately and so family reunification may take place prior to any earnings being accrued ■ For category B sponsors⁴⁹⁶ seeking to reunify with their spouse or partner, they can apply for family reunification after 12 months for certain family members in Ireland and must have a gross income in each of the previous two years in excess of €30 000 <p>There are different thresholds depending on the status of the sponsor in Ireland and the number of family members they are looking to support</p> <p>The income requirement for sponsors seeking to reunite with older dependent relatives is €60 000 after tax and deductions for one parent, and €75 000 after tax and deductions for two parents. The sponsor will have to have earned this amount in each of the three years preceding the application</p> <p>The income requirement for sponsors seeking to reunite with children are set at net weekly earnings:</p> <ul style="list-style-type: none"> ■ One child: €705 ■ Two children: €806 ■ Three children: €907 ■ Four children: €998 ■ Five children: €1 124 ■ Six children: €1 240 ■ Seven children: €1 376 ■ Eight or more children: €1 472 |

⁴⁹⁴ The IPREM is an index used to decide whether a person or family is eligible to receive certain benefits or subsidies. It replaced the minimum salary as the indicator used for means testing in 2004.

⁴⁹⁵ Includes critical skills employment permit holders, investors, entrepreneurs, business permission holders, researchers approved scholarship programme students, intra corporate transferees, PhD students (subject to conditions, including no recourse to social welfare payments), full time non-locum doctors in employment, a minister of religion.

⁴⁹⁶ Includes non-critical skills employment permit holders and all stamp 4 holders not covered by other more favourable arrangements.

| EMN Member Country | Income requirement |
|--------------------|--|
| IT | <p>The annual social allowance plus half again for each family member to be reunited. In 2024, this amounted to €10 420.99 for one family member, €13 895.66 for two, etc.</p> <p>For reuniting two or more children under 14, the income must be at least double the annual social allowance. The total annual income of all family members living with the applicant is also considered in this calculation</p> <p>Valid income for 2024:</p> <ul style="list-style-type: none"> ■ €13 894.66 - two or more minors under the age of 14 ■ €13 894.66 - one minor under the age of 14 + one adult ■ €17 368.32 - one minor under the age of 14 + two adults ■ €20 841.99 - one minor under the age of 14 + three adults ■ €17 368.32 - two or more minors under the age of 14 + one adult ■ €20 841.99 - two or more minors under the age of 14 + two adults ■ €24 315.66 - two or more minors under the age of 14 + three adults |
| LT | <ul style="list-style-type: none"> ■ For adults, it is equal to the minimum monthly wage, which currently stands at €1 038 ■ For minors, it is half the minimum monthly wage, currently €519 |
| LU | The sponsor must provide proof that their resources are equivalent to the monthly average rate of the social minimum salary of a non-qualified worker (€2 570 monthly) for a duration of 12 months prior to the application |
| LV | <p>For adults, not less than the minimum monthly wage (€740 as of 1 January 2025)</p> <p>For minors, 30% of the minimum monthly wage in the country</p> |
| NL | <p>For living with a partner/ sponsor who is married or in a registered partnership:</p> <ul style="list-style-type: none"> ■ €2 133.60 - monthly gross social security wage without holiday pay ■ €2 304.29 - monthly gross social security wage with holiday pay <p>For a sponsor who is a single parent:</p> <ul style="list-style-type: none"> ■ €1 493.52 - monthly gross social security wage without holiday pay ■ €1 613.00 - monthly gross social security wage with holiday pay <p>There is no different income requirement depending on the type and numbers of family members being reunited</p> |
| PL | The amount should exceed PLN 600 (€140) for people in the family or PLN 776 (€181) for singles |
| SE | <p>The income is calculated after tax and deduction of the rent cost</p> <p>In 2025, for cohabiting spouses or partners, the required leftover income is SEK 122 628 per year. If there are children, the sponsor must also meet the maintenance requirement for them. The required amount after tax and housing costs is:</p> <ul style="list-style-type: none"> ■ SEK 39 672 per year for children aged 0–6 ■ SEK 47 604 per year for children aged 7–10 ■ SEK 55 548 per year for children aged 11–14 ■ SEK 63 480 per year for children aged 15 or older |
| SI | The minimum income requirement for a family is calculated based on the necessary funds for each individual member, considering the specific circumstances of the case. The base amount is €494.09 per person as of 1 April 2025. This amount is adjusted according to the type of family member, using corresponding coefficients (e.g. 0.57 for an unemployed adult, 0.59 for a child) |
| SK | <p>For adults, it is equal to the minimum subsistence level (€273.99 per month for as of 1 July 2024) for each month of residence. If the length of stay exceeds one year, the amount of 12 times the minimum subsistence level is required (as of July 2024 this adds up to €3 287.88)</p> <p>For minors, it is half of the minimum subsistence level</p> |

Annex 5: Reference period for financial resources

| EMN Member Country | Reference period for financial resources |
|--------------------|--|
| BE | A sponsor must provide documentation of stable and regular income, ideally covering the 12 months before the application, which might be longer if self-employed |
| CZ | If the sponsor and/or a member of the family is an employee, he/she has to provide the proof of income in the last three months. If the sponsor and/or a member of the family is an entrepreneur, he/she has to provide the proof of last year's income. |
| DE | Generally, one year, but can be longer for self-employed applicants. This is used for a prognosis on the future. Hence future employment opportunities can and will be considered. |

| EMN Member Country | Reference period for financial resources |
|--------------------|--|
| EL | One year prior to application. |
| ES | One year prior to application. |
| FI | Generally assessed over six months, but longer employment history may be considered. |
| FR | One year prior to application, but stability and sufficiency of income are evaluated. |
| IE | Generally, two years, can increase to three years under special circumstances. |
| IT | Year of submission; past income can be considered if available; future income is considered if the examination of the application is prolonged. |
| LU | 12 months prior to the application. |
| NL | Assessment period varies based on employment type (typically one year) |
| PL | The stamp duty for granting a temporary residence permit for the purpose of family reunification is 340 PLN. There are no exceptions to the payment of this fee. There is also a fee for issue of residence card – 100 PLN. This fee may be reduced by half in the case of minor children and people in difficult financial circumstances. |
| SI | Six months before application and at time of decision. |
| SE | Three months prior to application. |

Annex 6: Websites with information on family reunification application process

| EMN Member or Observer Country | Brief description | Languages available | Links |
|--------------------------------|--|---------------------|---|
| AT | <p>Federal Ministry of Labour and Economy, Federal Ministry of the Interior and Federal Ministry for European and International Affairs operate a website that provides information on family reunification under the Settlement and Residence Act</p> <p>Websites of the competent authorities at provincial level link to this central website and offer further information</p> <p>Websites of the Federal Ministry of the Interior and the Federal Office for Immigration and Asylum</p> <p>General website maintained by the federal chancellery with information on family reunification in accordance with the Asylum Act</p> | | www.migration.gv.at www.wien.gv.at www.oesterreich.gv.at www.bmi.gv.at www.bfa.gv.at |
| BE | <p>Immigration Office website</p> <p>Each diplomatic post has a website containing information on the procedure</p> <p>UNHCR Belgium has information available for family reunification with recognised BIP</p> | FR, NL, EN | https://dofi.ibz.be/en/themes/third-country-nationals/family-reunification https://diplomatie.belgium.be/en/embassies-and-consulates https://help.unhcr.org/belgium/en/family-reunification/#:~:text=-Family%20reunification%20is%20only%20possible,subsidiary%20protection)%20or%20Belgian%20nationality |
| BG | Website of the Migration Directorate with the Ministry of the Interior | BG, EN | https://www.mvr.bg/migration |
| CY | Migration Department website | EL, EN | http://www.mip.gov.cy/md |
| CZ | Information can be found on the Official Information Portal for Foreigners of the Ministry of the Interior of the Czech Republic | | https://ipc.gov.cz/en/vi-sa-and-residence-permit-types/third-country-nationals/long-term-residence-permits/long-term-residence-permit-for-the-purpose-of-family-reunification/ |

| EMN Member or Observer Country | Brief description | Languages available | Links |
|--------------------------------|---|---|--|
| DE | <p>DE Make it in Germany – Portal for skilled labour migration by the Federal Government</p> <p>Family reunification for BIPs: by the Federal Foreign Office</p> <p>Family reunification by the Federal Office for Migration and Refugees</p> <p>Most municipal foreigners' offices also provide information. Furthermore the foreign representations often provide country specific information for visa applicants.</p> | | <p>https://www.make-it-in-germany.com/de/</p> <p>https://fap.diplo.de/webportal/desktop/index.html#start</p> <p>https://www.bamf.de/DE/Themen/MigrationAufenthalt/ZuwandererDrittstaaten/Familie/NachzugZuDrittstaatlern/nachzug-zu-drittstaatlern-node.html</p> |
| EE | <p>Website of the Police and Border Guard Board</p> <p>www.eesti.ee portal</p> | | <p>https://www.politsei.ee/en/instructions/residence-permit-for-a-minor-child-for-settling-with-a-family-member</p> <p>https://www.eesti.ee/eraisik/en/artikkel/citizenship-and-documents/right-of-residence-and-residence-permit-for-foreign-nationals</p> |
| EL | Website of the Ministry of Migration and Asylum | | https://migration.gov.gr/en/migration-policy/metanasteusi-stin-el-lada/ |
| ES | Website of the Ministry of Inclusion, Social Security and Migration | | https://www.inclusion.gob.es/web/migraciones/reagrupacion-familiar-traer-a-sus-familiares- |
| FI | <p>Website of the Finnish Immigration Service contains general instructions on applying for a residence permit and family reunification. Also includes separate pages for family member and sponsors, as well as a webinar on applying for a residence permit on the basis of family ties</p> <p>Ministry of the Interior website</p> <p>InfoFinland website</p> <p>Website on integration</p> | <p>Finnish, Swedish, English</p> <p>Finnish, Swedish, English</p> <p>Infonord.fi is available in 12 languages: Finnish, Swedish, English, Russian, Estonian, Ukrainian, French, Spanish, Turkish, Chinese, Persian, Arabic.</p> <p>Finnish, Swedish, English</p> <p>Webinar subtitled in Finnish, English, Swedish, Arabic, Russian, Somali</p> | <p>https://migri.fi/en/services</p> <p>https://migri.fi/en/moving-to-finland-to-be-with-a-family-member</p> <p>https://migri.fi/en/role-of-the-sponsor-in-the-permit-process</p> <p>https://youtu.be/kmb5c27qytY</p> <p>https://intermin.fi/en/areas-of-expertise/migration/migration-and-asylum-policy/family-reunification</p> <p>https://www.infofinland.fi/moving-to-finland/non-eu-citizens/family-member-in-finland</p> <p>https://kotoutuminen.fi/en/frontpage</p> |
| FR | <p>Dedicated website 'portal for foreign nationals' provides information on the applicable procedure</p> <p>Welcome to France website, created by Business France, which is tasked with helping foreign companies to set up in France and inform foreign companies and their subsidiaries about the organisation of transfers for their executives and employees, as well as the conditions for recruiting international talent. Also provides information for family members of foreign talent who come to reside in France under the accompanying family procedure</p> <p>Regarding family reunification of BIP, the OFPRA and the DGEF have published an online information brochure available in six</p> <p>Website 'refugies.info' managed by the Inter-ministerial Delegation for the Reception and Integration of Refugees (DIAIR) presents information on the family reunification of BIP procedure</p> | <p>French, English, Arabic, Pashto, Dari, Tigrinya</p> <p>French, English, Arabic, Pashto, Dari, Tigrinya, Russian, Ukrainian</p> | <p>https://etrangers-en-france.interieur.gouv.fr/les-procedures/regroupe-ment-familial</p> <p>https://www.welcometofrance.com/rubrique/famille-accompagnante</p> <p>https://www.immigration.interieur.gouv.fr/Immigration/L-immigration-familiale/Le-sejour-de-la-famille-des-refugies-des-proteges-subsidiaries-et-des-apatrides</p> <p>https://refugies.info/fr/demarche/5e3d2572ca16ad-0056c9dc48</p> |
| HR | Website of the Ministry of the Interior | | https://mup.gov.hr/al-iens-281621/281621 |
| HU | Website of the National Directorate-General for Aliens Policing | English, Hungarian | http://www.oif.gov.hu/factsheets/residence-permit-for-the-purpose-of-family-reunification |

| EMN Member or Observer Country | Brief description | Languages available | Links |
|--------------------------------|---|--|--|
| IE | <p>Department of Justice has a dedicated webpage on the family reunification procedure in Ireland</p> <p>The Citizens Information Board website provides comprehensive information on public services and the entitlements of citizens of Ireland. Citizens Information gathers information from various government departments and agencies and present the information in an easy-to-understand way. It also has a dedicated webpage for residence rights of family members</p> | | https://www.irishimmigration.ie/coming-to-join-family-in-ireland/ https://www.citizensinformation.ie/en/moving-country/moving-to-ireland/rights-of-residence-in-ireland/residence-rights-of-family-members/ |
| IT | <p>Ministry of the Interior's Portale ALI has a manual on completing the application</p> <p>Institutional websites of the competent one-stop-shop for immigration (at local level – Territorial Office of the Government)</p> <p>Websites of diplomatic and consular offices and websites of external service providers (outsourcers)</p> | | https://portaleservizi.dlci.interno.it/ |
| LV | Detailed information available on the website of the Office of Citizenship and Migration Affairs | | https://visspirmigraciju.pmlp.gov.lv/?page_id=36#toggle-id-1 |
| LT | <p>The Migration Department is the primary institution responsible for managing family reunification processes. Detailed information on the conditions and documents required to obtain a temporary residence permit, including for family reunification, can be found on the department's official website: www.migracija.lt</p> <p>The Migration Department also manages MIGRIS, a digital platform designed to streamline the application process. Through MIGRIS, applicants can create a personal account and access step-by-step instructions tailored to their circumstances. The platform enables users to select the appropriate application category for family reunification, review detailed explanations of the required documents, and submit and track their applications electronically</p> | | https://www.migracija.lt/en/home |
| LU | Information on the family reunification procedure, as well as all information required for the application, can be found on the government website www.guichet.lu | Information available in French, German, English | https://guichet.public.lu/en/citoyens/immigration/plus-3-mois/ressortissant-tiers/membre-famille/regroupement-familial.html |
| NL | Information on the family reunification procedures can be found on the IND's official website, ⁴⁹⁷ along with application forms | | https://ind.nl/en/residence-permits |
| PL | <p>Websites of the voivodeships (e.g. Mazovian Voivodeship, Wielkopolski Voivodeship)</p> <p>Website of the Office for Foreigners</p> <p>MOS – Moduł Obsługi Spraw (the Case Management Module)</p> | PL, EN, UA, RU; for the MOS website additionally: AR, FR, VN | https://migrant.wsc.mazowieckie.pl/ https://migrant.poznan.uw.gov.pl/en https://www.gov.pl/web/udsc-en https://www.mos.cudzoziemcy.gov.pl/en |
| SI | Written information available on the <i>infotujci</i> website. Administrative units and the Ministry of the Interior also provide information on the procedure | | https://infotujci.si/ and the EU Immigration portal (https://immigration-portal.ec.europa.eu/index_en) https://www.gov.si/en/state-authorities/administrative-units https://www.gov.si/en/state-authorities/ministries/ministry-of-the-interior |

⁴⁹⁷ IND, 'Residence permits', n.d., <https://ind.nl/en/residence-permits>, accessed 13 November 2024.

| EMN Member or Observer Country | Brief description | Languages available | Links |
|--------------------------------|--|-------------------------------------|--|
| SK | <p>The Slovak Republic does not have a centralised information portal for foreigners. However, comprehensive and up-to-date information can be accessed through the IOM Migration Information Centre (MIC), which has been supporting foreign nationals in their integration process since 2006. The MIC is the first and only centre of its kind in the country, offering foreigners complex services in legal, social, and employment counselling, further education, labour market integration, and support to community life of foreigners all in one place. Information is available via www.mic.iom.sk, in person, by phone, or via email.</p> <p>Information for foreigners can also be found on the websites of the Ministry of the Interior (www.minv.sk), the Ministry of Foreign and European Affairs (www.mzv.sk), and Slovak embassies and consulates abroad. Additional ministries, such as the Ministry of Labour, Social Affairs and Family and the Ministry of Education, Research, Development and Youth, also provide partial information for foreign nationals.</p> | Slovak, English, Russian, Ukrainian | www.mic.iom.sk www.minv.sk www.mzv.sk |
| SE | <p>The Swedish Migration Agency has information on its website (www.migrationsverket.se). Applicants and sponsors can call or email the Swedish Migration Agency's contact centre or Swedish Mission Abroad for information.</p> | | www.migrationsverket.se |
| RS | <p>All relevant information can be found on the website of the Ministry of Interior on the page Information for Foreigners and on the Portal for foreigners https://welcometoserbia.gov.rs/home</p> | | http://mup.rs/wps/portal/sr/gradjani/Informacije%20za%20strance https://welcometoserbia.gov.rs/home |

Annex 7: Administrative application fees

| EMN Member or Observer Country | Type and amount of administrative fees |
|--------------------------------|---|
| AT | <p>The following fees apply for applications for family reunification under the Settlement and Residence Act:</p> <ul style="list-style-type: none"> ■ Issuance fee of €20 per person or €50 for children under age six ■ Personalisation fee of €20 per person for photograph, fingerprint and signature processing ■ Initial fee of €120 per person or €75 for children under age six <p>Applications for an entry permit for the purpose of applying for international protection for family reunification under the Asylum Act are subject to a fee of €200 per person for persons over age six and €100 per person for persons under age six.</p> |
| BE | Fees to cover the costs of the Immigration Office (€236). Family members of BIP and minors are exempt. |
| CY | For third-country nationals not falling within the international protection category, the fees for the submission of the application are €200. |
| CZ | Upon application an administrative fee of 2,500 CZK (approx. 100 EUR) must be paid, 1,000 CZK (approx. 40 EUR) for minors under 15 years of age. |
| DE | national Visa 75 Euros for adults, 37,5 for minors. Fees for issuing the residence permit for the first time 100 Euros per person. |
| EE | There is a state fee for applying for a temporary residence permit for settling with spouse, registered partner or close relative of €225 euros when application is submitted in Estonia and €255 when the application is submitted at a foreign representation. In case of international protection, there is no state fee for the procedure and issuance of the residence permit. Additional fees may apply regarding the visa application. |
| ES | €10.94 fee for the permit. |

| EMN Member or Observer Country | Type and amount of administrative fees |
|--------------------------------|--|
| EL | When applying for the issuance of an initial residence permit for family reunification or for the renewal of a permit, the family member needs to submit an electronic fee of an amount of €150. Children under the age of 18 years old are exempt from the fee. |
| FI | In 2025, the fee for an application for a first residence permit is €530 for an online application and €580 for a paper application. For a minor applying for a residence permit, the fee is €270 for an online application and €300 for a paper application. ⁴⁹⁸ |
| FR | <p>Issuance of family reunification authorisation is subject to a fee of €265.⁴⁹⁹ The family reunification of BIP procedure requires payment of a €99 visa fee per applicant.</p> <p>Family members benefiting from family reunification are subject to a tax and stamp duty on the issuance of the first residence permit (or when they go to the OFII, for those who are granted a long-stay visa equivalent to a residence permit) and at renewal.⁵⁰⁰ The amounts of taxes and stamp duties owed for the issuance of a residence permit have been amended by the Finance Law for 2020.⁵⁰¹</p> <p>The amount of the tax is set at:</p> <ul style="list-style-type: none"> ■ €50 for spouses and children who entered France as minors under the family reunification scheme ■ €200 for spouses and children admitted under the family reunification scheme in the country <p>The amount of the stamp duty, which is to be paid in addition to the tax, is set at €25 and is payable upon each issuance or renewal of a residence permit.</p> |
| HR | Administrative fee for temporary stay when the application is approved is €46.45. The issuance of a biometric residence permit card is charged at €31.85, and if a third-country national seeks a residence permit in an accelerated procedure, i.e. within five working days from the date of submission, the fee is €59.73. In addition to the costs of the issuance of a residence permit, an administrative fee of €9.29 is charged. |
| HU | The application fee for a residence permit for the purpose of family reunification is €110 if submitted at a consular post, HUF 24 000 if submitted in Hungary via the Enter Hungary system, and HUF 39 000 HUF if submitted in person. |
| IT | <p>Administrative fees for the entire family reunification procedure are:</p> <ul style="list-style-type: none"> ■ 16 euros stamp duty ■ 116 euros of the consular fee for the entry visa, ■ on arrival in Italy, the family member must pay the costs for issuing the residence permit (between 76 and 126 euros, depending on the duration of the permit). |
| LV | There is a state fee for examining the documents for a temporary residence permit (€160–€560, depending on the time period of the examination procedure). Additional costs – state fee for examination of documents for visa application (if required), costs for legalisation of documents, consular fee if documents are submitted to the diplomatic or consular mission of the Republic of Latvia abroad. ⁵⁰² |
| LT | If a person is not exempt from the state fee, a fee of €360 is charged for urgent processing of the application, while a fee of €160 is charged for standard processing. |
| MT | The application fee is €27.50. This does not cover visa fees, where applicable, and other fees related to the attainment of evidentiary documents in the format required. Such fees are also borne by the applicant. |
| NL | <p>Applicants for family reunification, including of a sponsor who is a beneficiary of international protection, are required to pay a fee. The costs of the application fee are as follows:⁵⁰³</p> <ul style="list-style-type: none"> ■ €228 ■ Children under 18 years old: €76 |
| PL | The stamp duty for granting a temporary residence permit for the purpose of family reunification is PLN 340. There are no exceptions to the payment of this fee. There is also the fee for issue of residence card of PLN 100. This fee may be reduced by half in the case of minor children and people in difficult financial circumstances. |

498 Finnish Immigration Service, 'Processing fees and payment methods', <https://migri.fi/en/processing-fees-and-payment-methods>, accessed 4 February 2025.

499 Decree of 24 December 2001 setting in euros the amount of flat-rate fees due to the Office of International Migration for the introduction or admission of foreigners' family members to stay in France, <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000000223997>, accessed 16 June 2025.

500 Article L. 436-1 CESEDA.

501 Ministry of the Interior, 'Information note of 31 December 2019 regarding the overhaul of the tax system related to the issuance of residence permits and travel documents to foreigners', Official Bulletin of the Ministry of the Interior, 2020, <https://www.info-droits-etrangers.org/wp-content/uploads/2020/02/Note-dinformation-du-31-d%C3%A9cembre-2019.pdf>, accessed 16 June 2025.

502 Cabinet Regulation No. 731 of 26 November 2024, Regulations Regarding the State Fee for Migration Services, *Latvijas Vēstnesis*, No. 231, 27.11.2024 [entered into force 01.01.2025.], <https://likumi.lv/ta/id/356656-rules-on-state-fees-for-migration-services>, accessed 16 June 2025; Cabinet Regulation No. 707 of 21 November 2018, Price List of the Consular Remuneration of the Ministry of Foreign Affairs and the Procedures for the Collection of the Consular Remuneration and State Fees, *Latvijas Vēstnesis*, No. 231, 23.11.2018 [entered into force 24.11.2018.], <https://likumi.lv/ta/id/303212-arlietu-ministrijas-konsularas-atlidzibas-cenradis-un-kartiba-kada-tiek-iekaseta-konsulara-atlidziba-un-valsts-nodevas>, accessed 16 June 2025.

503 IND, 'Leges: kosten van een aanvraag', n.d., <https://ind.nl/nl/leges-kosten-van-een-aanvraag#kosten-verblijfsvergunning>, accessed 14 November 2024.

| EMN Member or Observer Country | Type and amount of administrative fees |
|--------------------------------|--|
| SK | <p>The administrative fee for a temporary residence application for family reunification is €200</p> <p>Applicants seeking family reunification with an asylum holder or a person granted subsidiary protection in The Slovak Republic, as well as those under 18 years of age, are exempt from this fee.</p> <p>The administrative fee for a permanent residence application (for both five-year residence and indefinite residence) is €250.</p> <p>Applicants under 18 years of age are exempt from this fee.</p> |
| SI | <p>The cost of the application form is €4.50. The administrative fee for the issue of a temporary residence permit (when the application is submitted at the administrative unit in the Republic of Slovenia) is €50. If the application for the first temporary residence permit is submitted at a diplomatic mission or consular post of the Republic of Slovenia abroad, the administrative fee is €102.</p> |
| SE | The application fee for a residence permit in Sweden is SEK 2 000 for adults and SEK 1 000 for children. |
| RS | The Law on Foreigners stipulates that one of the general conditions that a foreign citizen must fulfil in the procedure for granting residence on any basis is the submission of proof of payment of the prescribed administrative fee. The fee is approximately €200. |

Annex 8: Deadlines under national law and average duration for processing of applications

| EMN Member or Observer Country | Deadlines under national law | Average duration in practice |
|--------------------------------|---|--|
| AT | Without undue delay and within a maximum of six months | Not available |
| BE | Nine months (can be extended twice by three months) | Four-and-a-half to eight months |
| BG | For foreigners with a residence permit for more than one year, as well as persons with international protection, their applications for family reunification under the Law on Foreigners and its regulations are considered and decided within one month after coordination with the State Agency for National Security and the Consular Relations Directorate – Ministry of Foreign Affairs, which provide their opinions within 15 days | <p>One month</p> <p>This period does not include the period for applying and issuing the visa (15 calendar days) and after the family member enters the country, granting the right of residence and issuing a card-based document (13 days on average)</p> |
| CY | Nine months | 37 days |
| CZ | <p>The maximum limit is 270 days.</p> <p>In the case of family reunification with an EU blue card holder it is a maximum of 90 days.</p> | 79 days (excluding notification) in 2024 |
| DE | No deadline | There is no data available on average durations. Applicants should at least expect three-six months, 12 months if documents need to be verified. |
| EE | Two months for legal migration applications | Two months |
| EL | <p>Legal migration: nine months (can be extended by three months)</p> <p>Blue card holders, ICTs and Researchers: 90 days</p> | In international protection cases where the documents requested are submitted promptly, the duration of the procedure is a few months. However, in most cases the submission of the documents is delayed and the average duration of the procedure can be about one year |
| ES | Two months | Two months |
| FI | <p>Nine months</p> <p>Fast track:</p> <ul style="list-style-type: none"> ■ Family member of EU Blue Card holder: 60 days and if the employer is certified within 30 days. ■ Family member of researcher, student or holder of ICT permit: 90 days | <p>Average 2017-2024</p> <p>Family members of BIP: 268</p> <p>Average 2017-2024</p> <p>Family members of other foreign nationals: 189</p> <p>Average 2022-2024</p> <p>Fast track: 7 days</p> |
| FR | <p>Six months</p> <p>Family reunification of BIP: two to ten months.</p> | <p>179-206 days</p> <p>Family reunification of BIP: no information available</p> |

| EMN Member or Observer Country | Deadlines under national law | Average duration in practice |
|--------------------------------------|--|---|
| HR | 30-60 days | Varies based on case complexity |
| HU | 21 days. However, the period for remedying deficiencies (e.g., submission of missing documents) and for the implementation of various other procedural conducts is not comprised in the this time period. Furthermore, if the person would like to establish an employment relationship, the time limit for the single application procedure is 70 days. | No data available on average duration. |
| IE | No deadline | There is no data available on average duration. |
| IT | 120 days (90 days pre-authorisation + 30 days visa procedure) | Not available |
| LT | Three months (standard) / 45 days (urgent) Applications of highly qualified workers (EU Blue Card), intra-corporate transferees (ICT), startup founders, lecturers, researchers and their family members are processed within one month under the regular procedure, and within 15 days under the expedited procedure. For foreigners whose applications are examined within one month under the regular procedure, the actual processing time is 19 days; under the expedited procedure – 15 days | 39 days (standard) / 25 days (urgent) |
| LU | Nine months For EU Blue Card holders, 30 days if they are the family members of an EU Blue Card holder from another EU Member State Researchers and intra-corporate transferees: 90 days | Nine months |
| LV | 5-90 days Ten working days for family members of EU Blue Card holders | Within deadlines |
| MT | Nine months | One month |
| NL | Nine months | Around 63% of cases have an average duration of three months; 37% have a processing time longer than three months |
| PL | 60 days | 60 days |
| SE | ICT: 90 days EU-blue card: 90 days and 30 days if the main applicant has an EU blue card issued by another MS Researcher: 90 days Students: no deadline Work permit on national grounds: no deadline, Self-employed: no deadline | 400 days (about 13 months) |
| SI | 30-180 days | 118.9 days (about four months) |

| EMN Member or Observer Country | Deadlines under national law | Average duration in practice |
|--------------------------------|--|------------------------------|
| SK | 30-90 days EU Blue Card holders: 30 days In case of SK within 30 days: A family member of a Blue Card holder, if they apply simultaneously; a third-country national applying for family reunification with a Blue Card holder who is a Blue Card holder in another Member State and has applied for the granting of a Blue Card in the Slovak Republic within 30 days of entry into the territory of the Slovak Republic, and who has a valid residence permit in the Member State that granted the Blue Card to the third-country national with whom family reunification is being sought before a Blue Card was issued to them in the territory of the Slovak Republic; the spouse or a child under 18 years of age of a third-country national who: a) represents or works for a foreign investor in the Slovak Republic and is a citizen of an OECD Member Country; b) is a third-country national representing or working for a significant foreign investor in the Slovak Republic; c) is a third-country national representing or working for a business service centre or a technology centre; a third-country national, spouse | Within deadlines |
| RS | 30 days | Within deadlines |

Annex 9: Access to autonomous residence permits for family members

| EMN Member or Observer Countries | Access to autonomous residence permit (adults) | Access to autonomous residence permit under exceptional conditions | | | |
|----------------------------------|--|--|--|--|--|
| | | Death | Divorce | End of partnership | Other (e.g. domestic abuse and violence) |
| AT | No minimum duration Under the Settlement and Residence Act, family members are in most cases granted an autonomous right of settlement 'of their own' | Yes | Yes | Yes | Yes |
| | Under the Asylum Act, all family members receive their own administrative decision on their international protection status | N/A | N/A | N/A | N/A |
| BE | Five years* Long-term residence permit can be granted after five years | Yes* | Yes* | Yes* | Yes |
| CY | Five years Autonomous residence can be granted after five years of residence | Yes ¹ | Yes ¹ | Yes ¹ | Yes ¹ |
| CZ | Three years Autonomous residence can be granted after three years of residence | Yes: after two years of residence | Yes: after three years of residence | N/A | N/A |
| DE | Three years, minimum duration | Yes | Yes | Yes | |
| EE | Three years Autonomous residence can be granted after three years of residence or earlier* | Yes | Yes | Yes | Yes |
| EL | Five years Autonomous residence can be granted after five years of residence | Yes*: after one year of residence | Yes: after three years of relationship and one year of residence | Yes: after three years of relationship and one year of residence | Yes* |

| EMN Member or Observer Countries | Access to autonomous residence permit (adults) | Access to autonomous residence permit under exceptional conditions | | | |
|---|--|--|--|--|--|
| | | Death | Divorce | End of partnership | Other (e.g. domestic abuse and violence) |
| ES | Independent residence permit after one year of residence* | Yes | Yes: after three years of relationship and one year of residence | Yes: after three years of relationship and one year of residence | Yes* |
| FI | No minimum Family member may apply for a permit | Yes* | Yes* | Yes* | Yes |
| FR | Three years Autonomous residence can be granted after three years of residence. For family members of BIP, the 10-year residence permit for refugees and the four-year one for beneficiaries of subsidiary protection that are automatically granted cannot be withdrawn | Residence permit cannot be revoked | Residence permit cannot be revoked* | Residence permit cannot be revoked* | Residence permit cannot be revoked |
| HR | Three years Autonomous residence can be granted after three years residence | Yes: after three years of residence* | Yes* | Yes* | N/A |
| HU | No minimum Permanent residence can be granted after three years of residence | Yes: after two years of relationship and one year of residence* | Yes: after two years of relationship and one year of residence* | Yes: after two years of relationship and one year of residence* | Yes: after two years of relationship and one year of residence* |
| IE | Five years Independent residence permits can be granted after five years of residence | Yes* | Yes: after two years of residence* | Yes: after two years of residence* | Yes* |
| IT | Autonomous residence can be granted at the time of the first renewal of the residence permit | Yes | Yes | Yes | Yes |
| LT | Permanent residence can be granted after five years of residence | Yes | Yes | Yes | N/A |
| LU | Autonomous residence can be granted after five years of residence | Yes – after three years of residence | Yes* | Yes* | Yes |
| LV | No minimum Permanent residence can be granted after five years of residence | Yes* | Yes* | No | No |
| NL | Autonomous residence can be granted after two ² or five* years of residence | Yes – after one year of residence* | Yes* | Yes* | Yes |
| SE | Permanent residency can be granted after three years* | Yes* | Yes* | Yes* | Yes |

| EMN Member or Observer Countries | Access to autonomous residence permit (adults) | Access to autonomous residence permit under exceptional conditions | | | |
|---|---|--|-------------------------------------|---|--|
| | | Death | Divorce | End of partnership | Other (e.g. domestic abuse and violence) |
| SI | Autonomous residence cannot be granted but a family member may apply for a permanent residence permit after five years. | Yes: after three years of residence | Yes: after three years of residence | Yes: after three years of residence, only for legally registered partnerships | Yes: after three years of residence |
| SK | Long-term residence can be granted after five years* | No: Not possible without changing the purpose of residence, but temporary residence permits will not be revoked if the consequences of the revocation would be disproportionate. | N/A | N/A | N/A |
| RS | Autonomous residence can be granted after four consecutive years | Yes: after three years of residence | N/A | N/A | Yes |

Notes: *Under certain conditions; ¹For family members of BIP; ²For family members of EU Blue Card holders.



For more information

EMN website: <http://ec.europa.eu/emn>

EMN LinkedIn page: <https://www.linkedin.com/company/european-migration-network>

EMN X account: <https://x.com/emnmigration>

EMN YouTube channel: <https://www.youtube.com/@EMNMigration>

EMN National Contact Points

Austria www.emn.at/en/

Belgium www.emnbelgium.be/

Bulgaria www.emn-bg.com/

Croatia emn.gov.hr/

Cyprus www.emncyprus.mip.gov.cy

The Czech Republic www.emncz.eu/

Estonia www.emn.ee/

Finland emn.fi/en/

France www.immigration.interieur.gouv.fr/Europe-et-International/Le-reseau-europeen-des-migrations-REM3/Le-reseau-europeen-des-migrations-REM2

Germany www.bamf.de/EN/Themen/EMN/emn-node.html

Greece <https://migration.gov.gr/emn/>

Hungary www.emnhungary.hu/en

Ireland www.emn.ie/

Italy www.emnitalyncp.it/

Latvia www.emn.lv

Lithuania www.emn.lt/

Luxembourg emnluxembourg.uni.lu/

Malta emn.gov.mt/

The Netherlands www.emnnetherlands.nl/

Poland www.gov.pl/web/european-migration-network

Portugal rem.sef.pt/en/

Romania www.mai.gov.ro/

Spain www.emnspain.gob.es/en/home

The Slovak Republic www.emn.sk/en

Slovenia emnslovenia.si

Sweden www.emnsweden.se/

Norway www.udi.no/en/statistics-and-analysis/european-migration-network---norway#

Georgia migration.commission.ge/

The Republic of Moldova bma.gov.md/en

Ukraine dmsu.gov.ua/en-home.html

Montenegro www.gov.me/mup

Armenia migration.am/?lang=en

Serbia kirs.gov.rs/en

The Republic of North Macedonia <https://mvr.gov.mk/>

Albania