

Does the Whole-of-Route Approach Deliver on Refugee Accommodation and Housing?

A Case Study of Transit and Third-Country Solutions:
Bosnia and Spain





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Executive Summary

The general question raised by this report is what role housing plays inside the route-based international protection frame. It examines housing and accommodation outcomes for refugees, asylum seekers, regularized migrants (Spain), and undocumented people in two countries that sit at very different points along the journey of displaced people towards Western Europe: Bosnia and Herzegovina (BiH), a transit country on the Western Balkans route, and Spain, a frontline arrival country and resettlement state on the EU's southern frontier. The report links the two cases by a single policy question: *As governments and international organizations increasingly speak of a "whole-of-route" or "route-based" approach to mixed movements, does that approach materially improve housing and protection outcomes for people on the move, or does it operate principally as a vocabulary for distributing border control upstream?* The evidence assembled points in three directions.

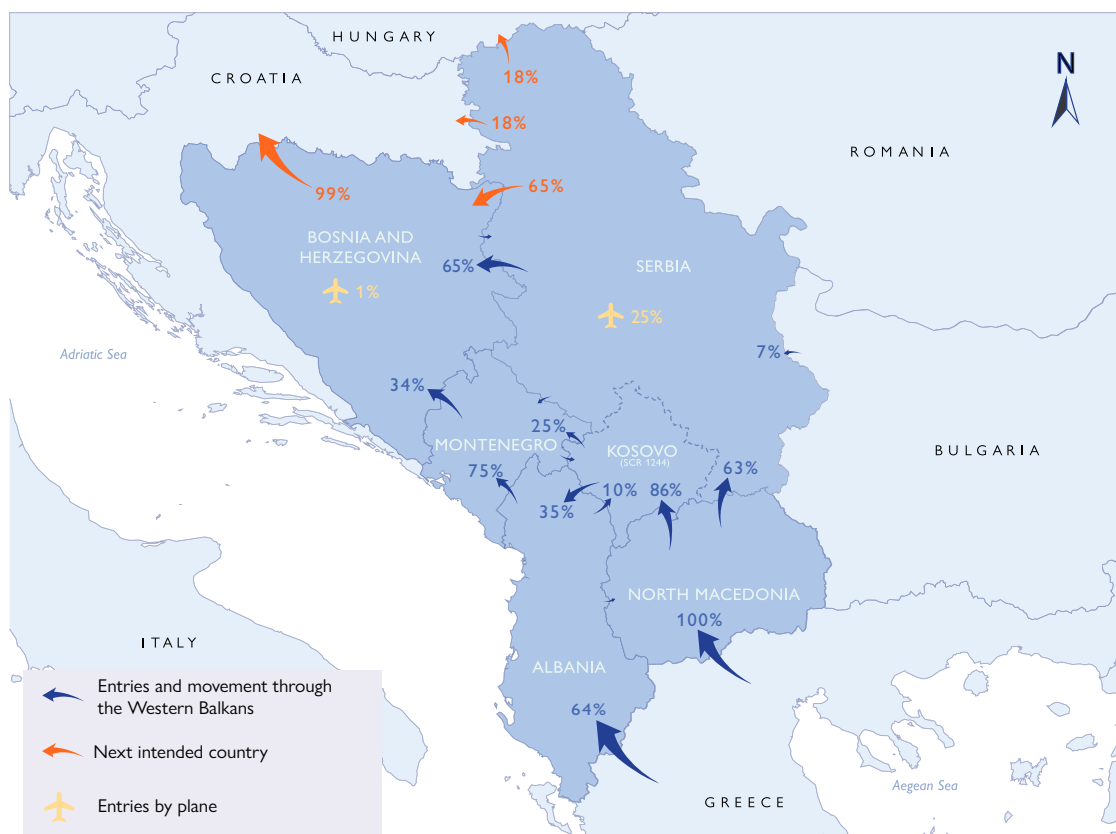
First, in both countries the formal reception architecture has been substantially expanded and professionalized in the past ten years, but in both countries this architecture coexists with a parallel landscape of informal shelter (abandoned buildings, makeshift camps, hotels used as long-stay emergency accommodation, and outright street homelessness) that disproportionately absorbs the most vulnerable groups: unaccompanied and separated children, people exiting child-protection care at 18 years of age, women and girls travelling alone, LGBTQ+ applicants, and undocumented people. Moreover, there is currently a clear trend toward dramatically shrinking the formal reception space in both countries, which is a development that warrants close consideration and monitoring.

Second, the housing challenge is not an issue of capacity in isolation, but rather a consequence of how protection systems link (or fail to link) up to the rental market and to autonomy (Spain) and final destinations (Bosnia). In Spain, the 18-month-to-24-month structured reception itinerary (which will soon be shortened) produces real autonomy for some, but discharges others into a private rental market that the country's own institutions and NGOs describe as systematically discriminatory and, especially in the Canary Islands and in the large urban centers, structurally undersupplied. In Bosnia, the question of post-reception housing barely arises because the asylum system grants almost no one a durable status: of 175 asylum applications registered in 2025, six refugees were recognized.

Third, the whole-of-route framing as currently practiced concentrates investment in containment (border management, Frontex deployments, return hubs, smuggler-disruption) rather than in the accommodation outcomes that the framing's own architects, including UNHCR, describe as inseparable from protection. The Brussels Declaration of December 2024 commits EU and Western Balkans partners to strengthen asylum and reception systems, but also, and primarily, commits them to "developing returns to countries of origin." The EU's €100 million-plus investment in BiH migration infrastructure since 2018 has been overwhelmingly directed at reception centers designed to manage transit, not at durable accommodation pathways on any point on the route. The result, visible in both countries, is a housing landscape that is backtracking on important improvements made at the center of the formal system, further degrading at the edges that the system does not reach.

The report recommends, in summary:

- I. linking expansions of resettlement and complementary pathways from Bosnia and other transit countries to dedicated housing-support packages in the destination state;
- II. treating Spain's post-reception phase — the transition from the formal reception system to the private rental market — as a protection issue requiring anti-discrimination enforcement, deposit guarantees, and social housing access on equal terms with nationals;
- III. extending care for unaccompanied minors past the age of 18 with continuity of accommodation, particularly in the Canary Islands and Ceuta and Melilla, where the cliff-edge to homelessness on emancipation is documented; and
- IV. reframing the whole-of-route approach away from a logic of containment and towards a logic of shared responsibility for reception and accommodation outcomes at every point on the journey.



This map is for illustration purposes only. The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the International Organization for Migration

Map 1. Overview of movements in the Western Balkans, January 2026.

Source: International Organization for Migration (IOM), 16 March 2026.

DTM Western Balkans — Migration Routes & Dynamics Report (January 2026). IOM, Europe and Central Asia.



INTRODUCTION

The Housing-Protection Nexus and Third-Country Solutions

The right to seek asylum is, at the level of international law, a right to leave one's country and to have a protection claim heard. In practice, the substance of that right is exercised in a particular building: a reception center dormitory, a hotel room contracted by a humanitarian program, a flat rented by an NGO, a tent on a contested site, a relative's sofa, a squat in a disused factory, or, as is increasingly the case, no roof at all. Housing is not an addition to refugee protection, whether for asylees or resettled refugees: it is one of the principal media through which protection either materializes or fails to materialize. A person who cannot secure stable accommodation cannot register a domicile, cannot enroll children in school, cannot keep medical appointments, cannot accept work in the formal economy, and, in many systems, cannot retain access to legal advice or to social assistance. International protection that does not include a coherent answer to the question of where someone will sleep, with what tenure, on whose terms, and for how long is incomplete by design.

This report examines the particular issue of housing along an active corridor of displacement towards Western Europe, by way of two contrasting countries

- » **Bosnia and Herzegovina** (the transit case): a small, internally divided state on the Western Balkans route, where between January 2018 and October 2025 more than 183,000 people transited en route towards the EU,¹ but where the asylum system itself registers only a few hundred claims per year and grants protection to a handful.²
- » **Spain** (the frontline-arrival case): an EU Member State that received 36,775 sea and land arrivals in 2025 alongside 144,396 asylum applications,³ that operates one of Europe's most structured three-phase reception systems,⁴ and that combines that system with a private housing market in which discrimination against migrants and refugees is comprehensively documented.⁵

1 International Organization for Migration, "Borići: A Medal of Humanity Forged in Adversity," November 19, 2025, available at: <https://bih.iom.int/stories/borici-medal-humanity-forged-adversity>.

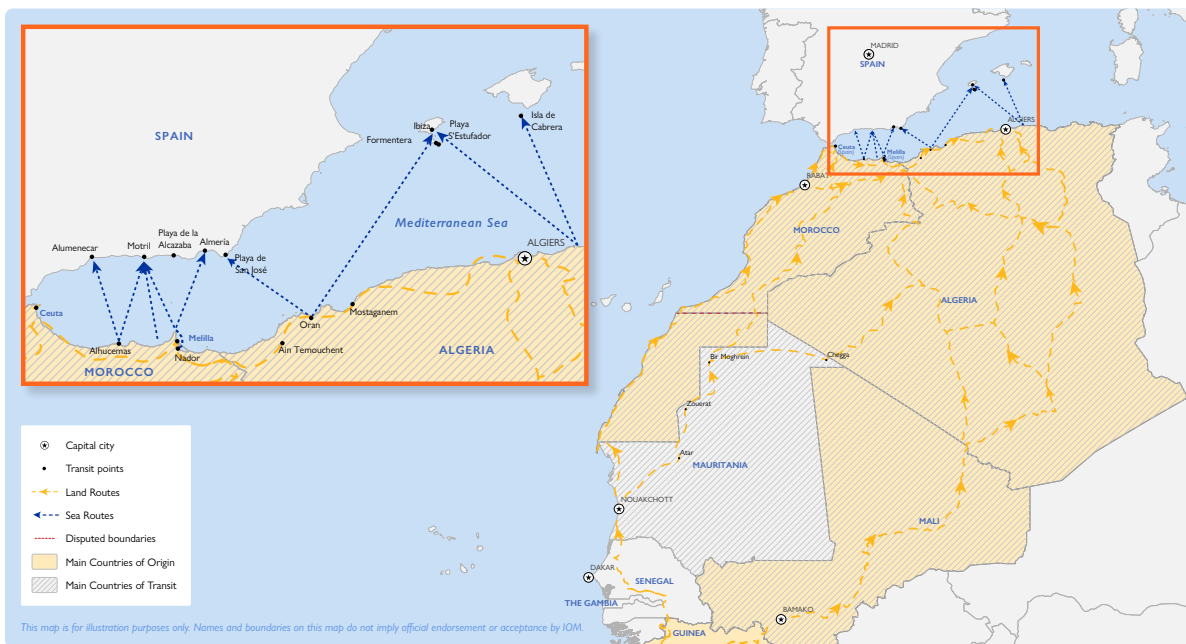
2 UNHCR, "BiH Monthly Report, December 2025," available at: <https://data.unhcr.org/en/documents/details/120827>.

3 UNHCR, "Asylum Applications and Sea Arrivals Decline, but International Protection Needs Among People Arriving in Spain Persist," January 29, 2026, available at: <https://www.unhcr.org/europe/news/press-releases/asylum-applications-and-sea-arrivals-decline-international-protection-needs>.

4 Asylum Information Database, *Country Report: Spain*, July 2026, available at: <https://asylumineurope.org/reports/country/spain>.

5 Asylum Information Database, *Country Report: Spain*.

The two countries stand at opposite ends of a route: one where people pass through, and one where many of them stay. The contrast shows how the politics and economics of housing operate in both modes. Another element binds the two cases together. Since the early 2020s, Western governments and the UN agencies most closely associated with mixed-movement responses (UNHCR and IOM) have increasingly framed migration policy in terms of a “whole-of-route” or “route-based” approach. UNHCR’s Director of International Protection, Elizabeth Tan, has summarized that shift as a recognition “that if you only tackle one side it’s not going to work,” combined with a renewed effort “to make that distinction that refugees are not migrants.”⁶ The approach mixes humanitarian assistance and protection advocacy with cooperation on border management, smuggling, and returns. The methodological premise — that decisions taken in one country shape conditions in another along the same corridor — is sound. The risk, recognized by Tan herself and pressed harder by critics, is that the framing becomes a vehicle for shifting containment costs upstream while the destination states maintain restrictions on access to their territory.



Map 2. Western Mediterranean route.

Source: International Organization for Migration (IOM), July 2025. *Global Overview of Migration Routes: January - April 2025*.

⁶ Irwin Loy, “What is UNHCR’s ‘Route-Based Approach’?,” *The New Humanitarian*, November 17, 2025, available at: <https://www.thenewhumanitarian.org/interview/2025/11/17/route-based-approach-refugees-migrants>.

Whether the route-based approach in practice delivers better housing and protection outcomes at every point along the route, or whether it simply distributes border control more efficiently, is the question this report attempts to test against the Bosnian and Spanish cases.

There are several caveats on the scope of this report. The report uses four categories of forced and irregular migrants referenced — resettled refugees, asylum seekers, regularized migrants (a special category in Spain), and undocumented people⁷ — recognizing that, in practice, individuals move between categories. It treats unaccompanied and separated children and other particularly vulnerable migrants (survivors of trafficking and gender-based violence, LGBTQ+ applicants, older applicants, applicants with mental-health needs) as cross-cutting groups whose housing situation must be tracked across categories rather than within any one of them. The report draws on a set of approximately 50 primary and secondary sources, including the Asylum Information Database (AIDA) comprehensive and continuously updated country report for Spain,⁸ the Comisión Española de Ayuda al Refugiado (CEAR) 2025 annual report,⁹ the European Union Agency for Asylum (EUAA) Roadmap with BiH for 2025–2027,¹⁰ UNHCR’s December 2025 BiH update,¹¹ and Frontex and IOM monthly reports on the Western Balkans;¹² as well as four semi-structured interviews conducted online between April and May 2026, with a Provivienda (a Spanish NGO) housing specialist in Spain,¹³ a UNHCR Spain protection officer,¹⁴ a Church World Service (CWS), an INGO, regional coordinator for Europe,¹⁵ and a CWS outreach worker based in Bihać.¹⁶ Interview material is cited by role only.

7 We use the term “undocumented people” following the Platform for International Cooperation on Undocumented Migrants (PICUM): “We use the term ‘undocumented’ to refer to someone who has not been granted authorisation to enter, live or work in a country. It emphasises a person’s administrative status and doesn’t make a negative value judgment about that status. We are among those who have been calling for decades for an end to the use of dehumanising terminology, like ‘alien’ or ‘illegal’ to refer to any person or group of people or actions linked to human mobility.” Quote taken from: <https://picum.org/words-matter-2>.

8 Asylum Information Database, *Country Report: Spain*.

9 CEAR, *Informe 2025: Las personas refugiadas en España y Europa*, June 2025, available at: https://cendocps.carm.es/documentacion/2025_personas_refugiadas.pdf.

10 EUAA, *Roadmap for Cooperation Between the EUAA and Bosnia and Herzegovina (2025–2027)*, January 2025, available at: <https://www.euaa.europa.eu/publications/roadmap-cooperation-between-euaa-and-bosnia-and-herzegovina-2025-2027>.

11 UNHCR, “BiH Monthly Report, December 2025.”

12 Frontex, “Irregular Border Crossings Down 26% in 2025, Europe Must Stay Prepared,” January 15, 2026, available at: <https://www.frontex.europa.eu/media-centre/news/news-release/frontex-irregular-border-crossings-down-26-in-2025-europe-must-stay-prepared-lyKpVb>.

13 Author interview with a Provivienda housing specialist (Spain), conducted online, May 8, 2026.

14 Author interview with a UNHCR Spain protection officer, conducted online, April 28, 2026.

15 Author interview with a CWS regional coordinator for Europe (Belgrade-based), conducted online, April 3, 2026.

16 Author interview with a CWS outreach worker (Bihać, Bosnia and Herzegovina), conducted online, May 6, 2026.



CONCEPTUAL FRAMEWORK

The Whole-of-Route Approach and the Place of Housing

The whole-of-route approach, as developed by UNHCR and IOM, and as taken up by EU institutions, can be read as an attempt to bring within a single policy frame three phenomena that international refugee law and policy have historically kept apart.

First, the approach states that contemporary movements towards the EU are mixed — refugees and labor migrants travel on the same routes, using the same facilitators, often in the same vehicles — and that distinct legal categories do not map cleanly onto observable behavior at any given point on the journey.

Second, the approach assumes that decisions taken in destination states, transit states, and countries of first asylum are mutually constitutive: a contraction of resettlement programs in one destination changes departure patterns elsewhere; a reception-capacity expansion at the EU's external border changes the calculations of smuggling networks operating two countries further inland.

Third, the approach reframes protection as something that can and should be delivered through coordinated action at multiple points along a corridor, genuinely including stakeholders on different levels of governance and operations, not only at the final point of asylum, and not only by national authorities.

These commitments, on their own terms, are coherent. The route-based approach offers a more accurate description of how human movements actually work than the country-by-country lens that still organizes most national asylum systems.

When there is a well-coordinated and protection-oriented route, it tends to produce desirable protection outcomes. For example, Julia Sardelić's recent study of the Western Balkans documents how, between September 2015 and March 2016, the post-Yugoslav transit corridor briefly functioned as a coordinated route along which refugees travelled in days rather than years, but only to revert to "violent pushbacks" and what she calls a regime of "hyper-temporariness" after the EU-Turkey statement of March 2016.¹⁷ Beznec, Speer, and Stojić Mitrović had earlier shown that the "Europeanization" of migration policy in the Balkan transit states

¹⁷ Julija Sardelić, *Refugee Protection Crises and Transit Europe: Immediate Responses, Selective Memory, and the Self-Serving Politics of Diversity* (Springer, 2025), especially chapter 4, available at: <https://link.springer.com/book/10.1007/978-3-032-01275-3>.

proceeded through a particular blend of securitization and humanitarianism, with humanitarian logics frequently materializing inside security practices and vice versa.¹⁸

To take another important example, the response to the entry of millions of Ukrainian refugees to EU countries following the Russian invasion of February 2022 — which triggered the Temporary Protection Directive (TPD) for the first time, established numerous well-coordinated corridors of movement and reception internationally, nationally, and locally — is arguably (in substance, if not in name) an exemplary “route-based” approach that responded effectively and efficiently to the largest displaced population in Europe since World War II.

For the purposes of this report, the key takeaway from the aforementioned is this: any analytic frame that treats Spain, Bosnia, Serbia, Greece, Italy, Germany, and the countries of origin as independent variables misses the way these corridor dynamics actually generate the conditions inside any one of them.

The question raised by the present report is what role housing plays inside the route-based frame.



Photo: Abby Becker / Church World Service

¹⁸ Barbara Bezec, Marc Speer, and Marta Stojić Mitrović, *Governing the Balkan Route: Macedonia, Serbia and the European Border Regime*, Rosa Luxemburg Stiftung Southeast Europe, Belgrade, 2016, available at: <https://bordermonitoring.eu/wp-content/uploads/2017/01/5-Governing-the-Balkan-Route-web.pdf>.

Housing has rarely been treated as a load-bearing component of the approach. UNHCR’s articulation of route-based work as set out by Tan stresses emergency response, advocacy on asylum systems, work against smuggling and trafficking, returns, and resettlement;¹⁹ housing appears as an implicit element of “emergency needs” rather than as an axis of policy in its own right. The Brussels Declaration of December 2024 between the EU and the Western Balkans speaks of strengthening reception systems and asylum systems in general terms, but situates those references inside a longer list of border-protection, smuggling-disruption, return-cooperation, and visa-policy commitments.²⁰ The EU’s 2026 solidarity pool under the Pact on Migration and Asylum — 21,000 relocations or €420 million in financial contributions — is organized around relieving pressure on frontline arrival states, not around delivering accommodation outcomes for the people whose pressure is being relieved.²¹

To be sure, there are practical reasons for this. Housing is locally administered almost everywhere: municipalities own, regulate, or subsidize the stock; landlords are private; rents are set by markets that are particularly inelastic in tourist-dependent or land-constrained regions; and the price and availability of housing for any specific group, including forced migrants, is shaped by the same forces that shape it for everyone else. The route-based approach, by contrast, is predominantly national and supranational. The gap between the policy level at which housing is decided and the policy level at which routes are governed is significant, and one that needs to be filled to address the harms caused by people engulfed by it.

If the approach is what its proponents claim, it should be possible to trace concrete improvements in accommodation conditions at successive points along the route; if instead it is a vocabulary for pushing containment costs upstream, we should expect to see improvements in border management combined with persistent or worsening conditions in informal housing along the route. The Bosnian and Spanish cases that follow allow a preliminary version of this test.

19 Loy, “What is UNHCR’s ‘route-based approach’?”

20 “EU-Western Balkans Summit, Brussels Declaration, 18 December 2024,” available at: <https://www.consilium.europa.eu/media/wvld5ka1/brussels-declaration-2024-en.pdf>.

21 Council of the EU, “Migration and asylum: Member States Agree on Solidarity Pool,” December 8, 2025, available at: <https://www.consilium.europa.eu/en/press/press-releases/2025/12/08/migration-and-asylum-member-states-agree-on-solidarity-pool>.



CONTEXT

Route Dynamics in 2024-2025

Three pieces of corridor-level context are useful before turning to and analyzing the country cases.

The first concerns volumes. Frontex's preliminary 2025 figures show detections of irregular border crossings at the EU's external borders falling by 26% to almost 178,000, the lowest level since 2021 and less than half the total of 2023.²² The decline is unevenly distributed:

- the Western Africa route towards the Canary Islands recorded the steepest fall (around two-thirds);
- the Western Balkans route fell sharply;
- Eastern Mediterranean fell overall but with a more-than-tripling of arrivals from eastern Libya to Crete; and
- the Western Mediterranean towards mainland Spain rose, driven mainly by departures from Algeria.²³

The Western Balkans case illustrates the point. Frontex registered 21,520 detections on the Western Balkans route in 2024, a 78% fall on 2023, and 10,493 detected crossing attempts in the first ten months of 2025.²⁴ Resting on numbers such as these, governments in both Spain and Bosnia have begun to downscale the formal reception infrastructure in their respective countries.

²² Frontex, "Irregular Border Crossings Down 26% in 2025."

²³ Frontex, "Irregular Border Crossings Down 26% in 2025."

²⁴ InfoMigrants, "Changes Ahead for Temporary Reception Centers for Migrants in Bosnia," August, 12 2025, available at: <https://www.infomigrants.net/en/post/68593/changes-ahead-for-temporary-reception-centers-for-migrants-in-bosnia>.

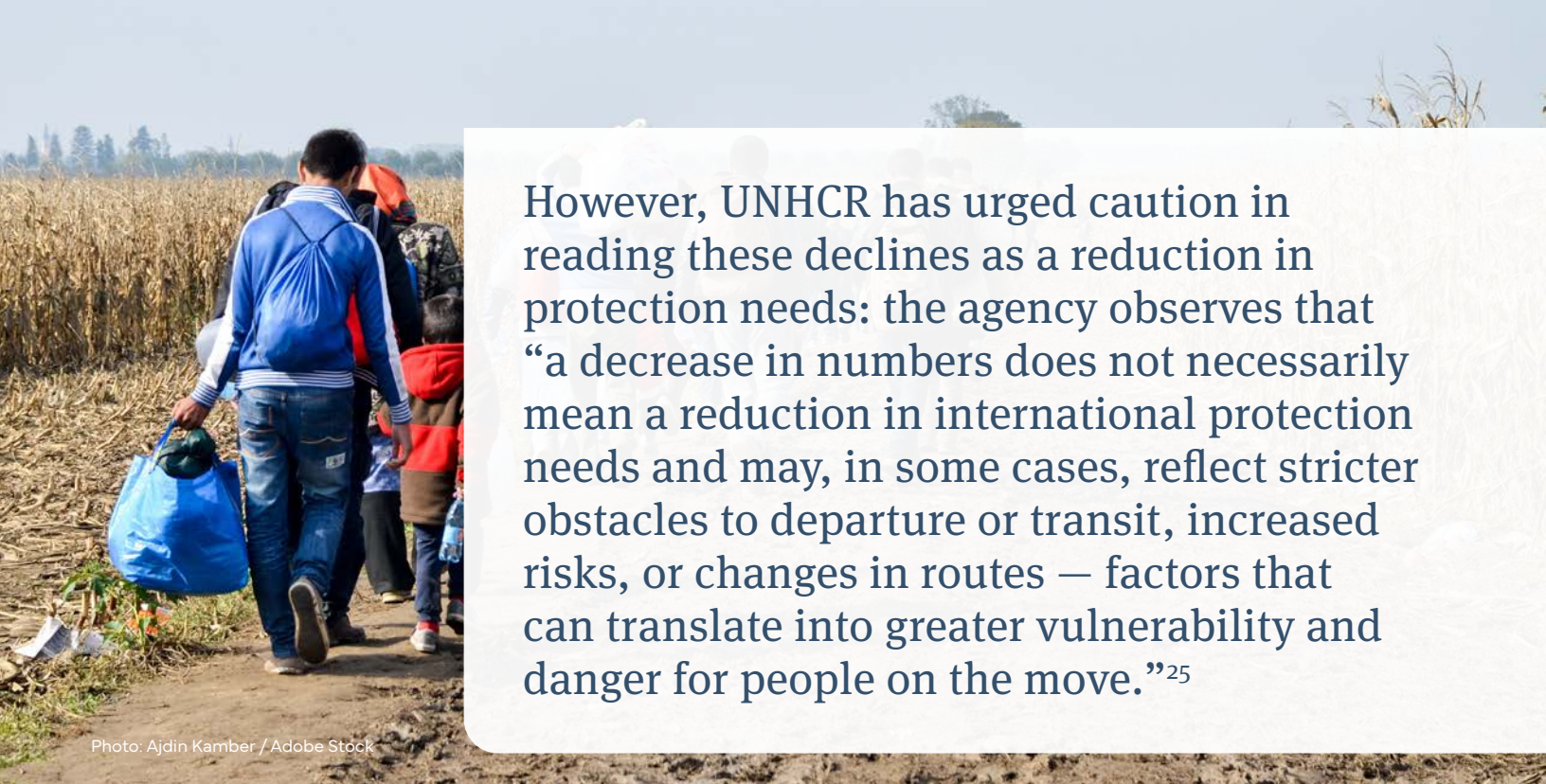


Photo: Ajdin Kamber / Adobe Stock

However, UNHCR has urged caution in reading these declines as a reduction in protection needs: the agency observes that “a decrease in numbers does not necessarily mean a reduction in international protection needs and may, in some cases, reflect stricter obstacles to departure or transit, increased risks, or changes in routes — factors that can translate into greater vulnerability and danger for people on the move.”²⁵

BiH’s own data shows arrivals in 2025 at less than half of 2024 levels,²⁶ but practitioners working downstream of the route, including Italian jurist Gianfranco Schiavone in Trieste and researchers in Slovenia, report that they have not observed a substantial decrease in arrivals on the Italian side, and that the explanation may be that smugglers have become “more organized,” arranging accommodation along the way to keep movements outside official detection.²⁷ The Italian Consortium of Solidarity has called for “careful analysis” of Frontex’s data, noting that no international source shows a real decrease in departures from the main areas of origin.²⁸

A CWS regional coordinator interviewed for this report draws the same inference about deliberate invisibility from the supply side: in her assessment, both the Serbian and Bosnian governments are “reducing reception capacity” precisely so that “the number of people travelling through the countries is not high,” because the official figures only count people who register at the reception centers.²⁹ Whatever else the figures measure, they do not in themselves establish that fewer people are moving; they may instead measure improved invisibility.

25 UNHCR, “Asylum Applications and Sea Arrivals Decline.”

26 InfoMigrants, “Changes Ahead for Temporary Reception Centers.”

27 InfoMigrants, “Changes Ahead for Temporary Reception Centers.”

28 European Council on Refugees and Exiles, “BALKAN ROUTE: NGO Warning About Frontex Data Showing Major Fall in Irregular Crossings...,” January 23, 2025, available at: <https://ecre.org/balkan-route-ngo-warning-about-frontex-data-showing-major-fall-in-irregular-crossings-%E2%80%95-agreement-on-frontex-deployment-in-bosnia-and-herzegovina-%E2%80%95-agreement-on-border-control-co-oper>.

29 CWS regional coordinator interview, April 3, 2026.



Photo: Ajdin Kamber / Adobe Stock

The second piece of context concerns who is moving and where they want to go. IOM's August 2025 survey of 808 migrants across the Western Balkans recorded an average length of stay in transit countries of 404 days since leaving the country of origin, with Afghans averaging 809 days. Sixty-four percent of respondents had used facilitators at some point on the journey; 73 per cent had transited through Türkiye; and the most common corridors out of Türkiye into the Western Balkans ran via Bulgaria-Serbia and via Greece-North Macedonia-Serbia, both feeding into Bosnia and Herzegovina.³⁰ On intended destinations, Italy ranked first (50 percent of respondents), followed by Germany (21 percent), France (9 percent), and Spain (which ranked second in some nationality breakdowns, with 11 percent overall).³¹

The composition of those arriving in BiH has shifted in parallel. A CWS outreach worker in Bihać describes the change in her own caseload: "before there were mostly people from Afghanistan and Pakistan, mostly Bangladesh. Sometimes ... now we have a lot of people from Sudan ... but also other African countries. But Sudan suddenly started. Then [we had] children from Egypt."³² Length of stay inside BiH has shrunk in parallel with these changes in national composition. The same outreach worker observes that the current average stay in the Bihać reception system is "10 to 15 days," down from "seven or eight months or even a year" a few years ago, and

³⁰ International Organization for Migration, "Western Balkans: Migration Routes & Dynamics, Monthly Report, August 2025," available at: <https://bih.iom.int/sites/g/files/tmzbd11076/files/documents/2025-10/western-balkans-migration-routes-dynamics-monthly-report-august-2025.pdf>.

³¹ International Organization for Migration, "Western Balkans."

³² CWS Bihać outreach worker interview, May 6, 2026.

“almost two years” at the peak of the COVID-19 closures.³³

What is striking from a housing perspective is that 16 percent of IOM-surveyed respondents reported having slept outside or squatted in abandoned buildings during their time in the Western Balkans — a conservative number.³⁴ That figure is the housing reality the formal reception system in Bosnia is supposed to absorb. One in six people who moves through the corridor falls outside it.

These conditions sit on top of a bilateral readmission architecture that the CWS regional coordinator describes as functionally indistinguishable from informal pushbacks. Croatia uses both its readmission agreement and the “safe third country” option (claiming BiH is safe) to return people caught on Croatian territory back into Bosnia, often after they have already claimed asylum in Croatia.

In her formulation, “the only difference between a pushback and a readmission is the dignity of the return process.”³⁵ People returned to Bosnia who do not enter the asylum procedure then re-enter the cycle of attempted onward crossing, producing what she calls a “ping-pong” effect on the Balkan route, with theft of personal belongings and derogatory acts used to deter future attempts. The Bihać outreach worker confirms that now, in 2026, readmissions are happening “almost daily,” with groups of between 12 and 25 people transported from the official border crossing back to the BiH Service for Foreigners’ Affairs office and onwards to the reception center.³⁶

The third piece of context concerns the policy architecture being built around these routes. The Brussels Declaration of December 2024 committed the EU and Western Balkans partners to deeper cooperation on migration management, border protection, returns, and asylum reception, with the EU welcoming the progressive rolling out of new Frontex Status Agreements with regional partners.³⁷ BiH initialed its Status Agreement with Frontex on December 18, 2024, the Council of Ministers gave consent for provisional application in early 2025, the BiH Presidency unanimously adopted it in May 2025, and the new Frontex joint operation in Bosnia

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³³ CWS Bihać outreach worker interview, May 6, 2026.

³⁴ International Organization for Migration, “Western Balkans.”

³⁵ CWS regional coordinator interview, April 3, 2026.

³⁶ CWS Bihać outreach worker interview, May 6, 2026.

³⁷ “EU-Western Balkans Summit.”

and Herzegovina was launched in November 2025.³⁸ At a separate London summit in October 2025, the UK, Germany, the EU foreign-affairs chief, and the six Western Balkans states discussed return hubs and security cooperation, with Albania and Montenegro publicly rejecting the UK return-hub proposal but the broader cooperative framework reaffirmed.³⁹ BiH adopted a new Law on Border Control in January 2025, harmonizing provisions with the EU acquis as part of the country's accession negotiations.⁴⁰ Inside the EU, the Council in December 2025 agreed the 2026 solidarity pool of 21,000 relocations or €420 million, with Spain among the four states identified as under migratory pressure entitled to benefit.⁴¹

These three contextual pieces — falling but ambiguous arrival numbers, a documented persistence of protection needs and informal-shelter use along the route, and a policy architecture overwhelmingly oriented to border management and return — set the stage for the country cases.

The substantive question is whether the reception and housing systems in the two countries are organized to absorb the people who arrive at them well, and whether the route-level architecture creates the conditions for them to do so.

38 Sarajevo Times, "An Important Step Toward the EU: The Presidency of BiH Unanimously Adopted the Frontex Agreement," May 13, 2025, available at: <https://sarajevotimes.com/an-important-step-toward-the-eu-the-presidency-of-bih-unanimously-adopted-the-frontex-agreement>.

39 InfoMigrants, "Western Balkans: Managing Migration and Return Hubs Discussed at London Summit," October 22, 2025, available at: <https://www.infomigrants.net/en/post/67663/western-balkans-managing-migration-and-return-hubs-discussed-at-london-summit>.

40 Sarajevo Times, "The House of Peoples of BiH adopted the Law on Border Control," January 30, 2025, available at: <https://sarajevotimes.com/the-house-of-peoples-of-bih-adopted-the-law-on-border-control>.

41 Council of the EU, "Migration and Asylum: Member States Agree on Solidarity Pool."





CASE STUDY

Bosnia and Herzegovina: Housing at the Margins of a Transit System

The reception architecture and what it does

Before 2018, Bosnia and Herzegovina did not have a migration governance system designed for large movements of people. The country had emerged from the war of the 1990s with one of the most administratively complex constitutional structures in Europe, with primary competence on asylum at the state level (the Sector for Asylum within the Ministry of Security) but with social welfare, child protection, and most aspects of housing administration devolved to the two entities, Brčko District, and the cantons of the Federation of Bosnia and Herzegovina. When numbers of people transiting along the Western Balkans route into BiH rose sharply in 2018 — concentrated in the Una-Sana Canton bordering Croatia, and in the wider Bihać area — the state did not have the capacity (or in many cases the political will) to set up a reception system, and the response was led by IOM with European Union financing and the City of Bihać's willingness to make a derelict student dormitory and other buildings available.⁴²

⁴² IOM, "Borići."

Out of that improvised beginning, an architecture eventually emerged. By the mid-2020s, BiH had two formal channels of accommodation. The first was the Asylum Centre Delijaš near Sarajevo, managed by the Sector for Asylum, with a capacity of 154 beds expandable to 300. The EUAA assesses Delijaš as meeting CEAS reception standards and notes that, given low rates of registered asylum claims relative to transit movement, the center operates above the level of asylum-related need.⁴³ The second channel was a network of Temporary Reception Centres (TRCs) initially managed by IOM with EU funding and progressively being transferred to the BiH Service for Foreigners' Affairs. As of 2025 the principal facilities were TRC Lipa near Bihać (full capacity 1,512), TRC Blažuj near Sarajevo (capacity 1,700), TRC Ušivak in the Sarajevo Canton (capacity 800, jointly managed by SFA and IOM since the beginning), and TRC Borići in Bihać, designed as a family-focused center.

TRC LIPA



Photo: International Organization for Migration

⁴³ EUAA, *Roadmap for Cooperation*.



The EU's financial commitment underwrites the system. The EU has invested more than €100 million in BiH's migration response since 2018, supporting the establishment and operation of reception centers, state institutions, and local agencies.⁴⁴

The renovation of TRC Borići alone exceeded BAM 2 million (around €1 million), transforming a former student dormitory without electricity, running water, or a sound roof into what one IOM camp manager described as "a place to call home, even if only for a part of their journey."⁴⁵ This is real, material improvement. People previously sleeping in parks and squats in Bihać were absorbed into accommodation that, when properly staffed, provided primary health care, gender-based-violence services, mental health and psychosocial support, pediatric care, and sports and education activities for children — services provided jointly by IOM, UNHCR, the Danish Refugee Council, Médecins du Monde, the Red Cross, United Nations Children's Emergency Fund (UNICEF), United Nations Population Fund (UNFPA), and Jesuit Refugee Service.⁴⁶

The 2025–2027 EUAA Roadmap with BiH builds on this base. It focuses on strengthening asylum legislation in line with the CEAS, sustainable national training, the gradual transfer of TRC management from IOM to the Service for Foreigners' Affairs, and reception capacity for unaccompanied minors among other vulnerable groups.⁴⁷ The Bosnian government has signaled commitment to a state-led reception model: a new Migration and Asylum Strategy of BiH and Action Plan 2026–2030 is to govern the period of state takeover, and the Law on Border Control adopted in January 2025 harmonizes border provisions with the EU acquis as part of accession negotiations.^{48,49} Reception conditions, Amnesty International notes in its 2024–25 country report, have been "considerably improved" in BiH centers, though the Committee on the Elimination of Racial Discrimination retained concerns about the continued administrative detention of migrants, including children.⁵⁰

⁴⁴ InfoMigrants, "Changes Ahead"; International Organization for Migration, "Borići."

⁴⁵ International Organization for Migration, "Borići."

⁴⁶ International Organization for Migration, "Borići."

⁴⁷ EUAA, *Roadmap for Cooperation*.

⁴⁸ InfoMigrants, "Changes Ahead."

⁴⁹ Sarajevo Times, "The House of Peoples of BiH adopted the Law on Border Control."

⁵⁰ Amnesty International, *Bosnia and Herzegovina 2025*, available at: <https://www.amnesty.org/en/location/europe-and-central->

Housing for asylum seekers and beneficiaries of protection: a system with no exit

The improvement of reception infrastructure has not translated into a functioning durable-housing pathway for the simple reason that the BiH asylum system grants protection to almost nobody. UNHCR's December 2025 monthly update for BiH reports that 175 asylum claims were registered during all of 2025, compared to 235 in 2024 and 147 in 2023. Six refugees were granted refugee status in 2025 (the highest figure in years), 55 received subsidiary protection, 34 were rejected, and 100 had procedures terminated.⁵¹

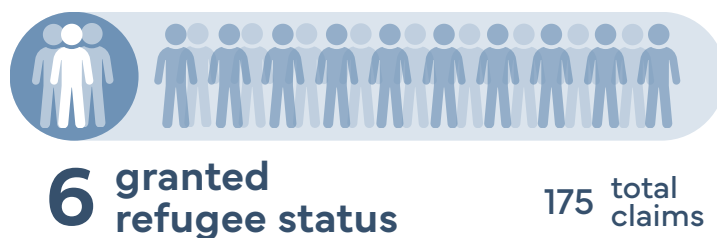


Chart 1. Asylum claims and refugee status granted in BiH in 2025.
Source: UNHCR, "BiH Monthly Report, December 2025."

At the end of December 2025, there were 286 people under international protection in the country: 45 with refugee status and 241 with subsidiary protection. Three refugees were naturalized in 2025; the Law on Citizenship excludes beneficiaries of subsidiary protection from naturalization eligibility.⁵² The average processing time from issuance of the Attestation of Expressed Intent to Seek Asylum (AISA) to a first-instance decision was 441 days. Forty-eight percent of asylum seekers pending a Refugee Status Determination (RSD) interview had been waiting for over six months, averaging 366 days.⁵³

[asia/western-central-and-south-eastern-europe/bosnia-and-herzegovina/report-bosnia-and-herzegovina.](#)

51 UNHCR, "BiH Monthly Report, December 2025."

52 UNHCR, "BiH Monthly Report, December 2025."

53 UNHCR, "BiH Monthly Report, December 2025."

In effect, the housing question for protection-holders barely arises in BiH at scale because the population that should be transitioning out of TRCs into autonomous accommodation is in the low hundreds. For the much larger transit population — 1,392 irregular arrivals registered in December 2025 alone, broadly stable compared with the previous month, with top declared countries of origin Afghanistan (29 percent), Egypt (15 percent), and Sudan (13 percent) — the TRC system functions as a stop on a longer journey.⁵⁴ Seventy-six per cent of new arrivals in December 2025 were issued AISA papers, but only 16 asylum seekers had their asylum claims actually registered by the Ministry of Security in the same month.⁵⁵ The gap between intent-to-seek-asylum and registration — 71 days on average for the second half of 2025, down from 109 days in the first half — is itself a housing condition: during that gap, people sit in TRCs without their claims active, or move on before the procedure starts.⁵⁶

The unreachable population: rough sleeping, squats, and the limits of the camp model

The clearest indicator that the system does not absorb everyone who passes through is the persistence of informal shelter alongside the formal one. The CWS account of conditions in early 2021, when the Lipa center opened as an open-air tent site for 1,400 people, burned down, and left around 3,000 people sheltering in “parks and forests, abandoned houses and factories or in outdoor makeshift settlements made of wood and tarps,” is the highest watermark of this gap, but the structural condition predates and outlasts that crisis.⁵⁷ Two-hundred unaccompanied children were estimated to be living in makeshift settlements outside official centers at that moment.⁵⁸ The closure of TRC Bira in 2020 — a fully equipped facility shut overnight, with single men relocated to Lipa already at capacity and 87 unaccompanied and separated children moved to Borići — pushed additional people into informal shelter; the Vučjak landfill site, used in 2019 to hold migrants relocated by Bihać authorities from the city, had no running water, no electricity, very few sanitation facilities, and conditions were deemed “inhumane.”

By 2025 the visible crisis had receded. Borići has been handed back to the City of Bihać in renovated condition; TRC Lipa has been reconfigured from a single-male

54 UNHCR, “BiH Monthly Report, December 2025.”

55 UNHCR, “BiH Monthly Report, December 2025.”

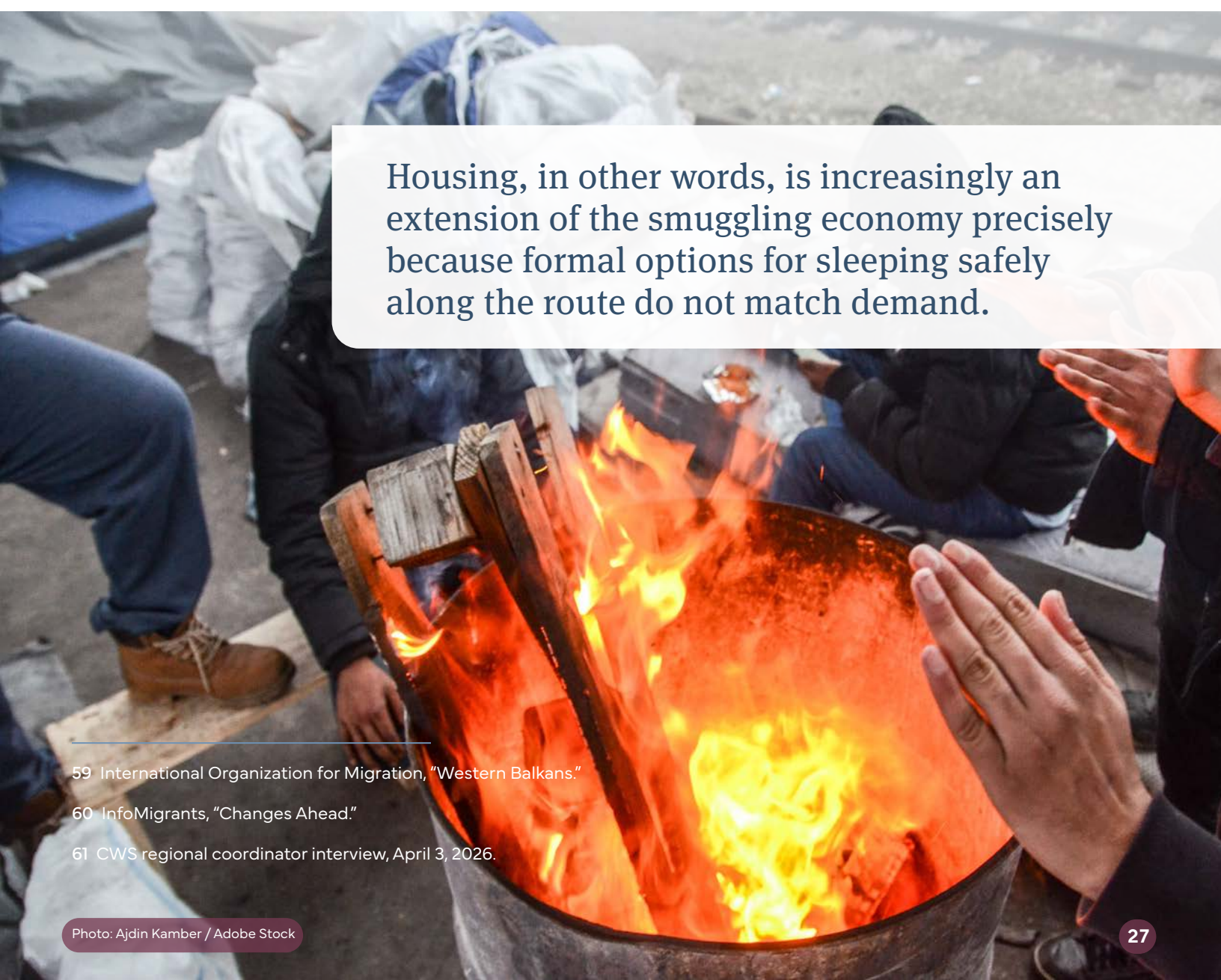
56 UNHCR, “BiH Monthly Report, December 2025.”

57 CWS regional coordinator interview, April 3, 2026.

58 CWS, “Migrant Centers in Bosnia: The Situation is Untenable,” February 11, 2021, available at: <https://cwsglobal.org/blog/migrant-centers-in-bosnia-the-situation-is-untenable>.

facility into a mixed center serving diverse populations; the most acute rough-sleeping populations in Una-Sana have been reduced. But the underlying pattern persists in the corridor. IOM's August 2025 cross-country survey found that 16 percent of respondents had slept outside or squatted in abandoned buildings during their stay in the Western Balkans.⁵⁹

Smugglers and facilitators are themselves involved in arranging accommodation. The Italian observers cited in an InfoMigrants report that smugglers are now "not only smuggling migrants but also organizing their accommodation away from the authorities' eyes."⁶⁰ The CWS regional coordinator confirms this reality and informs of a corresponding misinformation dynamic on the Bosnian side: her teams meet people who avoid the reception centers because "the smugglers told them they need to pay," and who do not know that reception services are available to them once they enter the territory.⁶¹



Housing, in other words, is increasingly an extension of the smuggling economy precisely because formal options for sleeping safely along the route do not match demand.

⁵⁹ International Organization for Migration, "Western Balkans."

⁶⁰ InfoMigrants, "Changes Ahead."

⁶¹ CWS regional coordinator interview, April 3, 2026.

The CWS regional coordinator's description of the Lipa center, the principal formal alternative in the Una-Sana Canton, helps explain why so many people prefer the informal option. "The problem with the Lipa reception center [is that] it was never a perfect reception center," she observes; "it's 25 kilometers outside of town, it's completely isolated. During winter it's completely isolated." People accommodated there have to "walk 50 kilometers back and forth" to reach an ATM, a supermarket, or any other point of ordinary urban life. "They're completely cut off and isolated from any social . . . fabric. And they're made invisible, right? Because . . . if you didn't know the Lipa was there, you could never find Lipa."⁶² Service provision inside the center has, on her account, eroded substantially since 2022 when the Ukraine crisis caused humanitarian funding to be rerouted. "For the last year and a half, the complete psychosocial and mental health component was not available in Lipa. The medical component was not available there. Nothing. It was completely emptied out of any meaningful service that means a lot to people."⁶³ With the closure of the downtown Bihać family center, Lipa now accommodates single adult men, single women, families, and unaccompanied children in a single container facility, with internal sectioning rather than separate sites.⁶⁴

For people who reject the center, the alternative is squatting. The CWS mobile team, the regional coordinator reports, has mapped "more than 30 [informal] settlements" across the Una-Sana Canton where people stay when not in reception centers. The team visits these sites daily to identify children, monitor families, and conduct needs assessments, "because you cannot force anyone to accept . . . registration or to go to reception center."⁶⁵ Even in winter, "many, many people are deciding to stay outside" because of a combination of Lipa's extreme isolation, the smuggler misinformation previously noted, and the fact that there is now only one center in the canton.⁶⁶ Private accommodation, available on a discretionary basis in Serbia for people with legal status or sufficient funds, has, the coordinator notes, "never [been] allowed" in Una-Sana Canton; on the few occasions when people were renting houses in Bihać, "it was . . . cracked down on."⁶⁷

⁶² CWS regional coordinator interview, April 3, 2026.

⁶³ CWS regional coordinator interview, April 3, 2026.

⁶⁴ CWS regional coordinator interview, April 3, 2026.

⁶⁵ CWS regional coordinator interview, April 3, 2026.

⁶⁶ CWS regional coordinator interview, April 3, 2026.

⁶⁷ CWS regional coordinator interview, April 3, 2026.

Unaccompanied and separated children and other vulnerable groups

Children are a recurrent presence in the BiH data. As of October 2025, children comprised 23 percent of the population accommodated across the four operational TRCs in Bosnia and Herzegovina, of whom 7 percent were with families and 16 percent were unaccompanied or separated children (UASCs).⁶⁸ Of 38 children registered in the asylum system in December 2025, 10 were unaccompanied or separated at the time of registration.⁶⁹

Before its 2025 hand-back, TRC Borići was the principal center designed to accommodate families and UASCs, with dedicated areas, guardianship arrangements, primary health care, pediatric infirmary support from UNICEF and DRC, and sexual and reproductive health services from UNFPA and Médecins du Monde.⁷⁰ With Borići no longer operating as a TRC, the consolidation of reception at TRC Lipa as a “mixed center capable of serving diverse needs and categories” places additional weight on the operational standards there.⁷¹

CWS’s role inside this system illustrates both what is possible at the protection edge and how thin the workforce now is. The Bihać outreach worker, who has been involved in the work for “almost . . . eight years,” describes a period when “we had in reception centers around 400 unaccompanied minors,” and CWS staff acted as legal guardians “by approval of [the] Centre for Social Welfare” because, under BiH law, guardianship is a precondition for an unaccompanied child to access any service. With falling numbers of UASCs and the transfer of center management to the BiH government, CWS has shifted to “mostly . . . outreach”; it remains the only organization with permission to legally transport unaccompanied minors, and it now also assists with the transportation of adults, families, and children because so few other organizations are still operating in Una-Sana.⁷² A safe house operates alongside Lipa for unaccompanied children under 15, for unaccompanied minors “in any way in danger like, for example . . . GBV cases,” and for children with medical conditions Lipa is “not adequate to treat.”⁷³

68 CWS regional coordinator interview, April 3, 2026.

69 UNHCR, “BiH Monthly Report, December 2025.”

70 International Organization for Migration, “Borići.”

71 International Organization for Migration, “Borići.”

72 CWS Bihać outreach worker interview, May 6, 2026.

73 CWS Bihać outreach worker interview, May 6, 2026.

The CWS regional coordinator describes the underlying legal guardianship arrangement with the Bihać center for social welfare as “an amazing model . . . that offers protection and access to services for unaccompanied and separated children,” and as “one of the best for quickly organizing a response and ensuring children without parental guardianship are legally protected and safely accommodated.”⁷⁴

The model worked, in her account, for two reasons that are difficult to scale: in that area “success . . . relies on individual personalities rather than systems,” and “the Bihać social welfare centers were more open to help because they were overwhelmed by the influx of people” and therefore less inclined to be territorial about responsibility.⁷⁵ The Bihać outreach worker confirms that operational space is now tight: the dedicated UASC reception center is “40 minutes away from city center,” the medical staff who used to be present 24/7 are now available only “one or two hours during the day,” the CWS field team has shrunk from “nine or 10” people to four, and cultural mediation, previously embedded, has been lost—“we no longer unfortunately had cultural mediator . . . [now] we know, for example, basic word[s] for Arabic or in Pashto.”⁷⁶ Funding shifts have driven the contraction: as the outreach worker puts it, “with all the change[s] that happened in [the] USA, it also affected us. So, that is unfortunately how we work right now.”⁷⁷

Outside the TRC system, integration stories exist and matter. CWS in Bosnia documents the journey of Adel, who arrived in 2018, sheltered in an abandoned house with his then-seven-year-old son when his son fell ill, was taken in, and supported by residents of Vikići near the Croatian border, married locally, learned the language, and was granted asylum in December 2021, going on to work as a cultural mediator for CWS.⁷⁸ IOM separately documents the recent return of five young Syrian men from BiH to Syria under the EU-funded Assisted Voluntary Return and Reintegration program, three of whom had been living in BiH “without legal status,” surviving on small jobs in agriculture and construction and on “the kindness of local people.”⁷⁹

⁷⁴ CWS regional coordinator interview, May 6, 2026.

⁷⁵ CWS regional coordinator interview, May 6, 2026.

⁷⁶ CWS Bihać outreach worker interview, May 6, 2026.

⁷⁷ CWS Bihać outreach worker interview, May 6, 2026.

⁷⁸ CWS, “From Migrant to Helper: Adel’s Story,” January 5, 2022, available at: <https://cwsglobal.org/blog/from-migrant-to-helper-adels-story>.

⁷⁹ International Organization for Migration, “From Displacement to Rebuilding: Empowering Syrians in Their Journey Back Home,” December 9, 2025, available at: <https://bih.iom.int/stories/displacement-rebuilding-empowering-syrians-their-journey-back-home>.

These stories illustrate the housing situation of those for whom the formal system does not work, and they show both directions in which a person can move from that situation: into local integration through unofficial channels, or onward — including back to the country of origin under assisted return.

The state-takeover transition and what it leaves unsettled

The principal change ahead is the transfer of TRC management from IOM to the Service for Foreigners' Affairs from 2026 under the new BiH Migration and Asylum Strategy and Action Plan 2026-2030.⁸⁰

The Borići handover in late 2025 and the consolidation of reception at Lipa are early steps. The EUAA Roadmap commits the agency to support reception managers and officers through training, with deliverables including at least 20 participations in EUAA reception trainings.⁸¹

The political environment in which this transfer occurs is unsettled. In May 2024, Republika Srpska decided to draft an agreement on “peaceful disassociation” from the Federation of BiH and passed entity laws creating parallel legal frameworks in contravention of the BiH constitution. Roma continue to live in “chronic poverty in inadequate housing,” and migrants and refugees are absorbed into a country where housing rights for the most marginalized resident groups are themselves systematically inadequate.⁸²

The Frontex deployment in Bosnia and Herzegovina, launched in November 2025, will operate alongside this state-led reception transition.⁸³ What the deployment does for the housing of people on the move depends on how its activities — joint border



Photo: Church World Service

⁸⁰ InfoMigrants, “Changes Ahead.”

⁸¹ EUAA, *Roadmap for Cooperation*.

⁸² Amnesty International, *Bosnia*.

⁸³ Sarajevo Times, “Frontex Launches First Full-Scale Operation in Bosnia,” November 1, 2025, available at: <https://sarajevotimes.com/frontex-launches-first-full-scale-operation-in-bih>.

operations, registration, return support — interact with the absorption capacity of the reception system and the conditions in informal shelter.

The CWS regional coordinator describes the broader logic in candid terms: the government intention, as she reads it, is “to just have Lipa in Bihać” as the BiH reception center, on the back of a strategy in which “both the Serbian and Bosnian governments are reducing reception capacity” so that the official numbers, which only reflect people who register, can be used to claim that few people are transiting.⁸⁴ On the downstream side, she reports, “Croatia is building a detention center — not a reception center — very close to Lipa on the Croatian side of the border”; the implication, she suggests, is that the EU is externalizing migration management “working as a fortress,” and that the Western Balkans countries “may become more than just transit countries” for the resulting undocumented population.⁸⁵

If past patterns hold, intensified border control increases the duration of stay in transit and shifts movement out of detection, neither of which improves housing outcomes for those moving. The route-based architecture is, on present trajectory, more developed on the security side than on the protection side; what BiH inherits as it takes over the system is a structure built for transit management, not for durable settlement.



Photo: Vanja Stokic / Adobe Stock

⁸⁴ CWS regional coordinator interview, May 6, 2026.

⁸⁵ CWS regional coordinator interview, May 6, 2026.



CASE STUDY

Spain: Reception Under Pressure, Housing at the Threshold

The reception system and its three phases

Over the past decade, Spain has built what is on paper one of the most structured reception systems in the European Union, adding 32,000 places in the International Protection Reception System (SAPI) and developing a public narrative around migrants of all categories that revolves around humanitarian duty, solidarity, the positive contributions migrants make to Spanish society, and humanitarian crisis preparedness.⁸⁶ Moreover, despite receiving large numbers of asylum seekers, Spain has not reduced its annual refugee resettlement quota, insisting that the resettlement program too is a crucial part of a robust international humanitarian tradition of helping vulnerable refugees in first countries of asylum find permanent protection. Although not without major challenges and significant upcoming changes (as will be shown below), this posture makes Spain a political outlier among Western countries on the broader issue of immigration and refugee resettlement.

The 2024 Reception Regulation organizes the system into three phases: 1) an initial assessment and referral phase, 2) a first reception phase of up to six months in residential centers, and 3) a second phase of up to a further 12 months of preparation for autonomy, during which beneficiaries are supported with financial aid towards rent in private accommodation.

The first reception phase takes place in two main types of facility: four Refugee Reception Centres (CAR) managed directly by the Directorate General for Humanitarian Assistance and for the Reception System of International Protection, with a combined capacity of 425 places, and a much larger network of reception facilities managed by 24 NGOs subcontracted by the Directorate General.⁸⁷

⁸⁶ Government of Spain, "The Government of Spain has Added 32,000 Places in 10 years for Asylum Seekers, An Example of International Solidarity," June 20, 2025, available at: <https://www.lamoncloa.gob.es/lang/en/gobierno/news/paginas/2025/20250620-international-protection-system.aspx>. For more detail, see Spanish Ministry of Inclusion, Social Security and Migration, *Informe del sistema de protección internacional en España*, June 2025, available at: <https://www.lamoncloa.gob.es/serviciosdeprensa/notasprensa/inclusion/Documents/2025/200625-Informe-Sistema-Proteccion-Internacional-Espanol-jun25.pdf>.

⁸⁷ Asylum Information Database, *Country Report: Spain*.

Across the system, total reception capacity stood at 28,200 places at the end of 2023, with €633 million allocated to the asylum reception system in 2023 and €652 million in 2024.⁸⁸ In addition, two Migrant Temporary Stay Centres (CETI) operate in the autonomous cities of Ceuta and Melilla, with capacities of 512 and 782 respectively (including tents in the latter), absorbing people who enter Spain via the North African enclaves.⁸⁹

Capacity has been expanded in the past four years on the back of Recovery and Resilience Plan financing. In October 2022, the government announced that €215 million from the Plan would be used to build 17 new reception facilities with a capacity of 6,100 places, of which seven were to be located in the Canary Islands.⁹⁰ Construction in cities including Mérida, Alicante, Vitoria-Gasteiz, Valladolid, Lleida, Lugo, and Soria has proceeded with varying degrees of political contestation, including organized opposition from the Popular Party (PP) and Vox in several Autonomous Communities and at the municipal level.⁹¹ A “migration emergency” declared by the Council of Ministers in October 2023 was extended in January 2024, with €60.6 million approved in February 2024 alone and a cumulative €286 million in additional funds allocated by March 2024.⁹² The EUAA operates in Spain under an Operational Plan for 2023–2026 that includes specific support for reception in the Canary Islands.⁹³

On its own terms, the system delivers a coherent itinerary: a person arriving by sea or air, registering an asylum claim, and being assessed as in need of reception conditions can expect to be placed in collective accommodation, receive Spanish-language instruction and labor-market orientation, transition to a financial-support phase for the rental of private housing, and complete the 18-month process (extendable to 24 months for vulnerable persons) with at least a chance at autonomy. The system processed 144,396 asylum applications in 2025, with decisions up 67 percent on the previous year, and granted some form of international or humanitarian protection to 75,274 people — 7,838 refugees, 10,103 subsidiary, 57,333 humanitarian (the majority Venezuelan).⁹⁴

88 Asylum Information Database, *Country Report: Spain*.

89 Asylum Information Database, *Country Report: Spain*.

90 Asylum Information Database, *Country Report: Spain*.

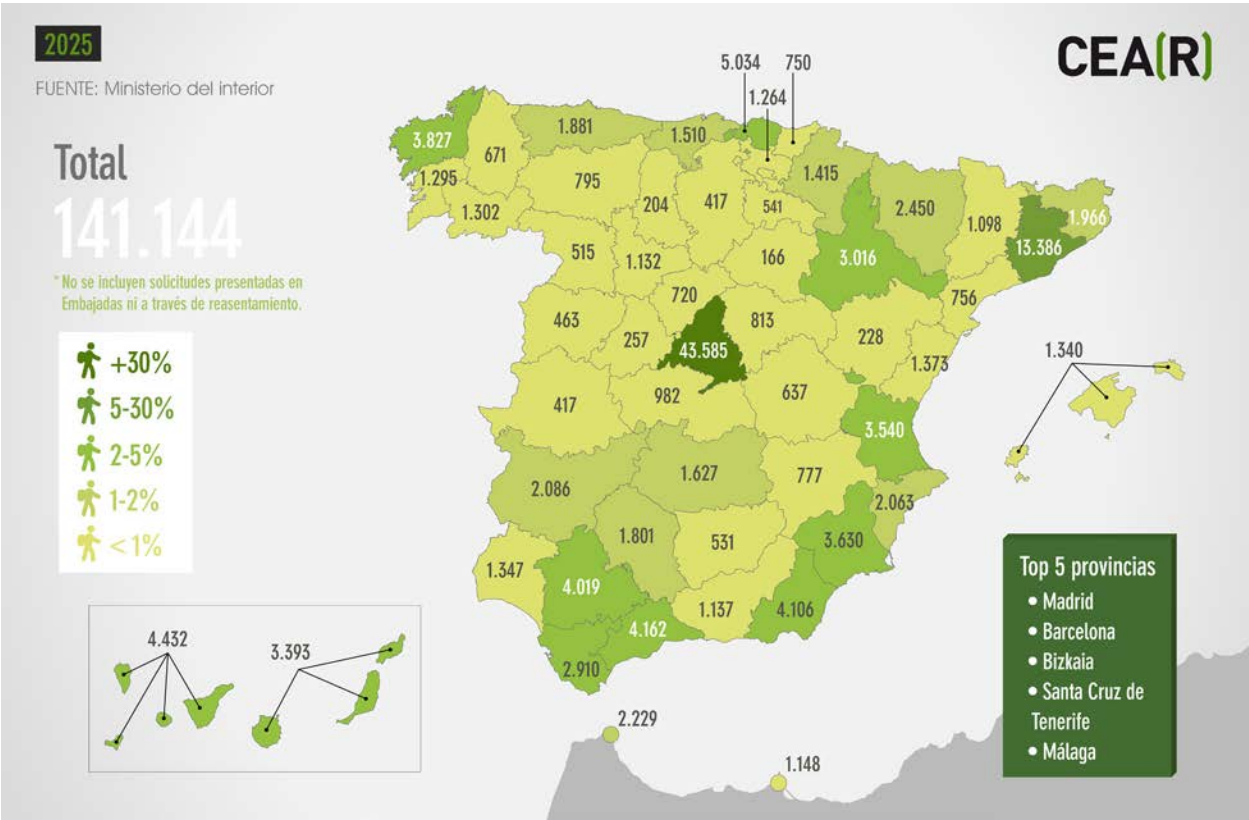
91 Asylum Information Database, *Country Report: Spain*.

92 Asylum Information Database, *Country Report: Spain*.

93 EUAA, *Operational Plan with Spain 2023–2026*, available at: <https://www.euaa.europa.eu/euaa-operating-plan-spain-2023-2026>; Asylum Information Database, *Country Report: Spain*.

94 UNHCR, “Asylum Applications and Sea Arrivals Decline.”

Spain also maintained a small but meaningful resettlement program: 861 refugees from Lebanon and Costa Rica arrived in 2025, of whom 30 percent were women and 37 percent were children.⁹⁵



Map 3. Reception places in Spain by province.
Source: Comisión Española de Ayuda al Refugiado (CEAR), Cifras de asilo en España (Asylum Figures in Spain) 2025



95 UNHCR, “Asylum Applications and Sea Arrivals Decline.”



The bottlenecks: access to the system and homelessness inside and outside it

Three sets of bottlenecks complicate this picture.

The first is access. Throughout 2024, the Madrid-Barajas airport asylum rooms registered persistent overcrowding driven by a sharp rise in transit applicants (largely Mauritanian nationals routing through Spain to South America); the Spanish Confederation of the National Police reported an increase in asylum applicants of up to 350 percent since June 2024.⁹⁶ The Bar Association of Madrid warned the Minister of Interior of structural deficiencies, including lack of qualified interpreters and overloading of professionals, that made it impossible to guarantee proper legal assistance.⁹⁷ Across mainland Spain, persistent difficulties in obtaining appointments to formalize asylum applications have left people in a legal limbo without access to reception conditions, health care, education, or housing assistance.⁹⁸

The second bottleneck is what happens to asylum applicants who fall out of the system. The AIDA Spain report documents cases of asylum seekers living on the street “because of the saturation of the reception system,” including 240 persons reported as living on the streets in Alicante by the local foundation Reapsha, and 140 persons newly arrived in Huesca from the Canary Islands in February 2024 “denouncing the risk to sleep on the streets.”⁹⁹ Disciplinary expulsion from CETIs in Ceuta and Melilla has, on documented occasions, resulted in asylum seekers being put onto the street; the NGO Solidarity Wheels reported in April 2024 that five asylum seekers were expelled from the Melilla CETI without a formal procedure for withdrawal of reception conditions. In March 2025, 14 asylum seekers were denied access to the CETI of Melilla after a police decision requiring asylum applications to be filed online rather than in-person, and they had to camp outside the facility until the Bar Association and the Ombudsperson secured their transfer to a reception facility in Málaga.¹⁰⁰

⁹⁶ Asylum Information Database, *Country Report: Spain*.

⁹⁷ Asylum Information Database, *Country Report: Spain*.

⁹⁸ Asylum Information Database, *Country Report: Spain*.

⁹⁹ Asylum Information Database, *Country Report: Spain*.

¹⁰⁰ Asylum Information Database, *Country Report: Spain*.

The third bottleneck — and the one most directly relevant to housing — is the transition out of the reception system. The 18-month itinerary is structured to lead a beneficiary into the private rental market, with financial aid towards rent paid during the second autonomy phase. Two recent developments make this transition substantially harder than the formal architecture suggests. First, the UNHCR Spain protection officer interviewed for this report describes a “massive reduction” in the duration of post-recognition reception support: refugees who are granted protection are now supported for six months in the system, down from the previous 18 to 24 months. Combined with priorities being placed on decisions for certain nationalities, she notes, this creates a severe bottleneck for those unable to achieve self-sufficiency quickly. The same officer attributes the contraction to the system being overwhelmed by demand and to political and budgetary constraints; she describes the resulting housing situation as a structural problem disproportionately affecting migrant and vulnerable populations.¹⁰¹ Second, the Provivienda housing specialist interviewed for the report notes that the extraordinary regularization set out in the November 2024 Regulation, which could benefit up to 700,000 people, generates a parallel housing crisis: people inside the reception system who gain legal documents are required to leave the refugee system’s accommodation within 15 days, but they cannot find affordable, discrimination-free housing outside the system in that time.¹⁰²

In practice, the AIDA report documents that the system’s rigidity creates obstacles for beneficiaries who could afford housing earlier or who have relatives able to host them: leaving the reception system early forfeits subsequent assistance. More substantively, “the lack of social housing alternatives, the insufficient financial support allocated for rent expenses, high requirements (i.e. payslips, high quantities for deposit, etc.) and criteria in rental contracts and discrimination exposes many beneficiaries of protection to

¹⁰¹ UNHCR Spain interview, April 28, 2026.

¹⁰² Provivienda interview, May 8, 2026.



Photo: Unsplash



Photo: Unsplash

economic vulnerability and in some cases leads to destitution.”¹⁰³ Some end up in homeless shelters. CEAR Euskadi has documented that “7 out of 10 real estate-agencies admit implementing explicit forms of discrimination, while the other 3 apply more subtle forms of it.”¹⁰⁴

The Provivienda report of March 2025 reiterates the discrimination faced by migrants and refugees in accessing rental housing, including by estate agencies themselves.¹⁰⁵ The UNHCR Spain officer adds a further mechanism observed on the demand side: landlords are cautious of Spain’s protective legal framework for renters and translate that caution into discriminatory tenant-selection practices, including refusing to rent to families with small children.

She links this directly to the chronic lack of social housing and the dispersed responsibility for housing programs across central, regional, and municipal levels.¹⁰⁶ The 2023 Spanish housing law (*Ley por el Derecho a la Vivienda*) provides a legal framework for state action, but implementation lags well behind need.¹⁰⁷

103 Asylum Information Database, *Country Report: Spain*.

104 Asylum Information Database, *Country Report: Spain*.

105 Asylum Information Database, *Country Report: Spain*.

106 UNHCR Spain interview, April 28, 2026.

107 Asylum Information Database, *Country Report: Spain*.



Photo: Kristof Laviers / Adobe Stock

The Canary Islands: a housing crisis inside a reception crisis

The Canary Islands case concentrates the structural problems of the Spanish reception model. Since 2020, the Atlantic route to the archipelago has become one of the principal corridors of arrival, peaking at 46,843 arrivals in 2024 (a 17.4 percent increase on 2023) and falling by around 62 percent in 2025 to track a wider decline.¹⁰⁸ UNHCR records that in the Canary Islands a significant proportion of those arriving by sea in 2025 were Malian nationals (37 percent), coming from a country marked by violence and forced displacement, and that 41 percent of asylum applications in Spain in 2025 were lodged by women and girls, reinforcing the need for gender- and age-sensitive reception.¹⁰⁹

The Canary Islands reception capacity has been overwhelmed for years. The Spanish Ombudsperson and a December 2024 thematic report on migrant children in the Canary Islands document a lack of adequate facilities, lack of minimum standards in reception, and overcrowding in the reception of unaccompanied minors.¹¹⁰ By December 2024, around 5,700 unaccompanied children were in the Canary system across approximately 86 reception arrangements, representing around 40 percent

¹⁰⁸ InfoMigrants, "Spain Urges Humanitarian Action as Canary Islands Struggle to Host Underage Migrants," January 6, 2025, available at: <https://www.infomigrants.net/en/post/62064/spain-urges-humanitarian-action-as-canary-islands-struggle-to-host-underage-migrants>; UNHCR, "Asylum Applications and Sea Arrivals Decline."

¹⁰⁹ UNHCR, "Asylum Applications and Sea Arrivals Decline."

¹¹⁰ Asylum Information Database, *Country Report: Spain*.

of all unaccompanied migrant children in Spain.¹¹¹ The State Secretary for Migration called for an agreement to distribute 6,000 unaccompanied minors that could not be assisted by the Canary Islands because the system was overwhelmed — its hosting capacity being a maximum of around 2,000.¹¹² The first version of a legal reform of the *Ley de Extranjería* to make distribution compulsory was rejected by Congress in July 2024 (PP, Vox, and JxCat voting against), with Vox publicly threatening to withdraw support from PP-led regional governments that negotiated immigration deals with the Sánchez government.¹¹³

A political pathway opened in early 2025. The government reached an agreement with JxCat in spring 2025 on the basis of which Spanish lawmakers approved on April 25, 2025 a plan to relocate thousands of underage migrants out of the Canary Islands and Ceuta — at that point hosting more than 6,000 and over 800 unaccompanied minors respectively in “overcrowded centers in substandard conditions” — to the rest of the country, with redistribution based on population, per capita income, unemployment, and existing migrant intake by region.¹¹⁴¹¹⁵ Catalonia, under the JxCat deal, will take between 20 and 30 minors of approximately 6,000.¹¹⁶ The Canary Islands government had separately approved in September 2024 its own protocol on the reception of migrant minors, which the Canary High Court of Justice (TSJC) suspended later that month after the Superior Prosecutor’s Office argued it could violate fundamental rights of migrant children; the case reached the Constitutional Court, which in February 2025 annulled the parts concerning social-assistance competence on the reception of minors.¹¹⁷ The UNHCR Spain protection officer describes the resulting situation as “very messy,” with authorities’ decisions “frequently driven by political orientation rather than a rights-based approach,” and the high numbers — around 8,000 unaccompanied minors in the Canary Islands by her reckoning, of whom thousands are applying for asylum — overwhelming the reception system. She also notes that the Canary Islands regional government sued the national authorities, arguing that minors who apply for asylum should be hosted by the central government, which is responsible for asylum seekers; an interim

¹¹¹ CEAR, *Informe 2025*.

¹¹² Asylum Information Database, *Country Report: Spain*.

¹¹³ InfoMigrants, “Spain Urges Humanitarian Action”; CEAR, *Informe 2025*.

¹¹⁴ Reuters, “Spain lawmakers approve underage migrant plan to relieve Canary Islands,” April 10, 2025, available at: <https://www.reuters.com/world/europe/spain-lawmakers-approve-underage-migrant-plan-relieve-canary-islands-2025-04-10>.

¹¹⁵ Euractiv, “Spanish Government Agrees with Puigdemont’s Party on a ‘Solidarity Distribution’ of Immigrant Minors,” 2025, available at: <https://www.euractiv.com/news/spanish-government-agrees-with-puigdemonts-party-on-a-solidarity-distribution-of-immigrant-minors>.

¹¹⁶ Euractiv, “Spanish Government Agrees with Puigdemont’s Party,” 2025.

¹¹⁷ CEAR, *Informe 2025*.

measure of the high court sided with the regions, meaning the central government must assume responsibility for the reception of asylum-seeking children.¹¹⁸

A particular feature of the Canary Islands case is the interaction between the reception crisis for asylum seekers and the broader housing crisis on the islands. According to the Vivienda Canarias report published in July 2025, the Canary Islands have the largest housing deficit in Spain, with only 7,900 homes built across the archipelago between 2021 and 2023 — a construction rate of just 0.31 percent per household, the lowest in the country.¹¹⁹ Construction of publicly protected housing stopped almost entirely in early 2022 and only resumed in 2025 at a low level. Twenty-nine percent of Canarian residents live in rented accommodation — well above the national average of 18 percent — and rents in Las Palmas average €1,128 per month, just shy of the national record of €1,155, with €1,083 in Tenerife.¹²⁰ Pressure from tourism, foreign-buyer demand for vacation rentals limited developable land, and restrictive land-use bureaucracy are identified as the structural drivers. The implication for refugees and other migrants is that, on the islands, there is almost no realistic path from the reception system into autonomous housing in the local rental market — even setting aside discrimination.

118 UNHCR Spain interview, April 28, 2026.

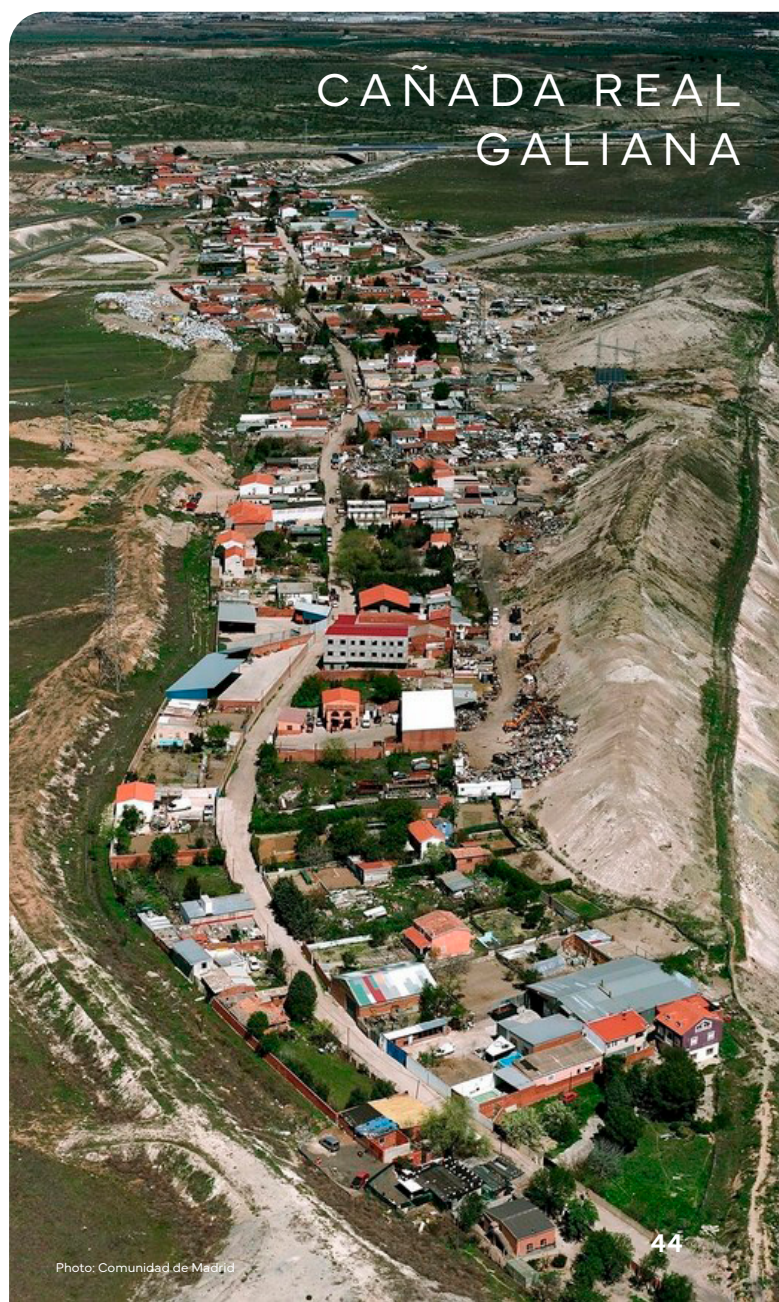
119 Canarian Weekly, “New Report Shows the Canary Islands Have the Worst Housing Shortage in Spain,” July 18, 2025, available at: <https://www.canarianweekly.com/posts/New-report-shows-the-Canary-Islands-have-the-worst-housing-shortage-in-Spain>.

120 Canarian Weekly, “New Report.”

Informal settlements and undocumented populations on the mainland

On the mainland, the housing situation of undocumented people, of asylum seekers who have fallen out of reception, and of seasonal migrant workers is shaped by informal settlements that the Spanish institutional system has documented for years without resolving. The informal settlement of Cañada Real Galiana in Madrid hosts around 4,600 persons including 1,800 children, many of them young, who have been without electricity since the last quarter of 2020. The case has been the subject of urgent recommendations from the Spanish Ombudsperson, several UN Special Rapporteurs, and the Council of Europe Committee on Social Rights, which in October 2022 set a 15 December deadline (subsequently missed) for the Spanish Government to restore electricity. As of October 2024, the Cañada Real continued to be without electricity after more than four years.¹²¹

In Andalucía, particularly in the agricultural zones of Almería and Huelva, informal settlements housing migrant agricultural workers, asylum seekers, and refugees have been documented for at least a decade. The NGO Almería Acoge reported in November 2024 that about 4,000 people were living in extreme conditions in the informal settlement of Níjar. The APDHA Frontera Sur 2025 report describes substandard housing without electricity or water, isolation from city centers, fire risks, and difficulties accessing health care and schooling for children, with many residents being victims of trafficking, forced labor, or forced prostitution.¹²² The First Strategic Plan to eradicate informal settlements and substandard housing in Andalucía was approved in August 2023, with €2 million allocated to municipalities including Lepe, Moguer, and Lucena del



¹²¹ Asylum Information Database, *Country Report: Spain*.

¹²² Asylum Information Database, *Country Report: Spain*.



Puerto in early 2024.¹²³ Implementation has been slow; after the death of a migrant in the Lucena del Puerto settlement, Sumar registered a parliamentary question highlighting “the inactivity of the Regional Government of Andalucía and the inefficiency of the Strategic Plan.”¹²⁴

For undocumented people more broadly, the legal landscape shifted in November 2024 when the government adopted a new Regulation of the Immigration Law (entering into force in May 2025) intended to regularize an estimated 300,000 persons through work, training, and family-ties pathways. NGOs including CEAR welcomed the reform but flagged missed opportunities: humanitarian visas were not introduced, asylum seekers cannot regularize their situation while still waiting for a decision, and — most strikingly — the period spent in Spain as an asylum applicant no longer counts towards the residence permit by *arraigo* if the asylum claim is denied, a provision NGOs have challenged at the Supreme Court.¹²⁵ For housing, the practical effect is that the rules now produce more clearly distinct legal categories: regularized migrants with stable residence, asylum applicants waiting outside the rental-eligible economy, and undocumented people whose movement between categories has been narrowed.

¹²³ Asylum Information Database, *Country Report: Spain*.

¹²⁴ Asylum Information Database, *Country Report: Spain*.

¹²⁵ Asylum Information Database, *Country Report: Spain*.

Particularly vulnerable groups in the Spanish system

Several groups face compounded housing risks across the Spanish system. Unaccompanied minors who reach majority age (*extutelados*) face an emancipation cliff that the CEAR 2025 report describes in detail. The number of applications from *extutelados* to the reception system rose substantially in 2024 due to the lack of alternative accommodation; on reaching 18, young people were forced to leave child-protection centers, sometimes ending up in homelessness, and then accessing the FVID phase of the international protection system. The 2024 system increased the number of places, but lengthy stays in initial assessment accommodation (intended for one month maximum) meant that intervention with *extutelados* was difficult precisely because the initial assessment phase is not designed to respond to their needs.¹²⁶

CEAR documents particular vulnerability for those with additional risk factors (mental health needs, LGBTQ+ identity, female trafficking victims, victims of gender-based violence) and notes that some *extutelados*, after entering the reception system, presented documentation indicating they were still minors; while these cases were referred to the Public Prosecutor for Minors, the process is not agile, and meanwhile children remain in adult reception facilities without adequate guardianship.¹²⁷

Promising projects exist outside the formal reception system — Esperanza en Acción's "La Petite" in Chiclana (Cádiz), the "Emancípate" project in the Canary Islands since 2018, the FEPA-led IMEX (Itinerarios de Emancipación de Éxito) network providing personalized emancipation referents — but coverage remains partial.¹²⁸ The UNHCR Spain protection officer describes the underlying problem in operational terms: many regions have implemented bridging programs to support minors who reach adulthood, often providing financial support for supported housing for one or two years, but a significant concern is the lack of coordination between administrations, which results in children being left on the streets on their 18th birthday — and in unaccompanied minors being "frequently moved and often left without support upon turning 18."¹²⁹ The effectiveness of regional bridging support, in her account, is driven by political priorities and local resources: wealthier regions like the Basque Country, which are also facing population ageing, are more proactive; regions directly impacted by large arrivals — the Canary Islands and Andalucía — are also more active in policy development.¹³⁰

¹²⁶ CEAR, *Informe 2025*.

¹²⁷ CEAR, *Informe 2025*.

¹²⁸ CEAR, *Informe 2025*.

¹²⁹ UNHCR Spain interview, April 28, 2026.

¹³⁰ UNHCR Spain interview, April 28, 2026.

Resettled refugees occupy a different but related niche of system-induced housing distress. The Provivienda housing specialist describes the situation of large families resettled from countries such as Syria and Afghanistan, who require large homes, often request placement in major cities (Madrid or Barcelona) on the assumption of better hospital and school access, and then cannot be placed in private rentals at the prices those cities now command. The result, in her words, is that these families remain “locked in the system” because alternative housing cannot be found, preventing the reception places from being used by others.¹³¹ Her organization’s own model — supporting around 804 refugees across approximately 160 homes dispersed across regions in regular houses of four to six places, distinct from the larger reception centers operated by other major NGOs — is one response to this. The absence of public-policy support for replicating that model at scale is, on her account, the principal limitation.¹³²

Older asylum seekers and beneficiaries of protection face their own profile of difficulties: health, lack of family or community support networks, language barriers, the absence of labor-market opportunities, and premature ageing due to hardships in countries of origin or along the migration journey. The Spanish legal framework includes formal non-discrimination by age, but in practice older applicants encounter obstacles to information, paperwork, and processes designed for younger working-age applicants.¹³³ CEAR has called for adaptive accommodation, intergenerational and culturally appropriate care, and continuity of psychological support for this group.¹³⁴

Across all groups, the Spanish system has the resources and the institutional design to do better than it currently does. The 2024 Regulation of the Immigration Law, the 2023 Housing Law, the 2024 Reception Regulation, the JxCat agreement enabling distribution of unaccompanied minors out of the Canary Islands, the EUAA operational support, and the Recovery and Resilience funding combine into a set of tools that could, in coordinated use, produce significantly better housing outcomes. The gap between the toolbox and the outcomes is, as the AIDA report observes year after year, the gap that defines the Spanish case.¹³⁵

¹³¹ Provivienda interview, May 8, 2026.

¹³² Provivienda interview, May 8, 2026.

¹³³ CEAR, *Informe 2025*.

¹³⁴ CEAR, *Informe 2025*.

¹³⁵ CEAR, *Informe 2025*.



COMPARATIVE ANALYSIS

Patterns Across the Route

A side-by-side reading of the Bosnian and Spanish cases produces a number of convergences and divergences that are not immediately obvious.

Convergences

First, both countries have built up a formal reception architecture that, at its core, performs broadly to international standards. The Asylum Centre Delijaš in BiH meets CEAS reception standards, the refurbished TRC Borići and the consolidated TRC Lipa offer accommodation, health care, gender-based-violence support, mental-health services, and educational and recreational activities; the Spanish CAR and NGO network of reception centers is similarly equipped and substantially better funded. Reception, in other words, is not the principal failure point in either system. The principal failure point is what happens at the edges and at the exits of the formal system.

Second, both countries combine that formal system with an unmeasured but consistently documented population sheltering informally — in abandoned buildings, parks, factories, hotels, hostels, agricultural informal settlements, and on the street. In Bosnia, this took the dramatic form of the Lipa winter of 2020-21 and the closure of the Vučjak landfill site; in Spain, it takes the chronic form of the Cañada Real informal settlement in Madrid, the Andalucían agricultural settlements of Almería and Huelva, and the periodic homeless episodes in Alicante, Huesca, and Melilla. The informal shelter population in both countries is disproportionately made up of people for whom the formal system has either not opened (undocumented adults; asylum applicants without registered claims; transit travelers without intent to apply) or has closed (people aged out of UAM protection; people whose asylum claims have been terminated; people who left reception without completing the itinerary).

Third, unaccompanied and separated children appear as a particularly visible — and politically inflammable — issue in both countries, and the political treatment of UASCs in both cases tracks a similar pattern: a centralized state authority (the BiH Ministry of Security; the Spanish central government) attempting to redistribute or absorb minors against the resistance of sub-state political units (cantons in the Federation of BiH that decline to host TRCs; Autonomous Communities led by PP and Vox in Spain that have voted against compulsory redistribution).

In both countries, the routine cliff-edge for unaccompanied minors who reach 18, the abrupt transition out of child-protection arrangements without continuity of housing, is recognized as a structural failure that the formal protection system has so far failed to bridge.

Fourth, the role of international organizations exhibits some similarity despite the very different settings. IOM is the principal external operator in BiH reception, with UNHCR providing complementary support; in Spain, the EUAA provides operational support inside a state-led system, with UNHCR participating but in a less operational role. In both cases, EU money pays for a substantial part of the reception infrastructure: over €100 million in BiH since 2018, €215 million of Recovery and Resilience funding plus €14 million in ERDF support to the Canary Islands and €87 million in Emergency Assistance / Thematic Facilities for Spain.



Divergences

The divergences are arguably more important than the convergences. The asylum systems themselves operate on radically different scales. Spain processed 144,396 asylum applications in 2025 and granted 75,274 some form of protection, in addition to which it operated a relatively small refugee resettlement program; BiH registered 175 asylum claims in 2025 and granted refugee status to six people, with 286 protection-holders in the country at year-end. Expressed differently: the BiH protection-holder population at the end of 2025 was smaller than the population of a single mid-sized Spanish reception center.

The implication is that the durable housing problem looks very different in the two countries. In Spain, the question is whether a system that grants protection to tens of thousands of people each year can usher them into autonomous housing; the answer the AIDA, CEAR, and Provivienda data converge on is “only partially.”

In BiH, the question of durable housing for protection-holders barely arises, because so few people stay; the housing question is instead about how reception conditions affect the safety and dignity of people who will move on anyway, in a context where the asylum system fails to capture the protection needs that the route-based monitoring data, including the August 2025 IOM survey, demonstrate are present.

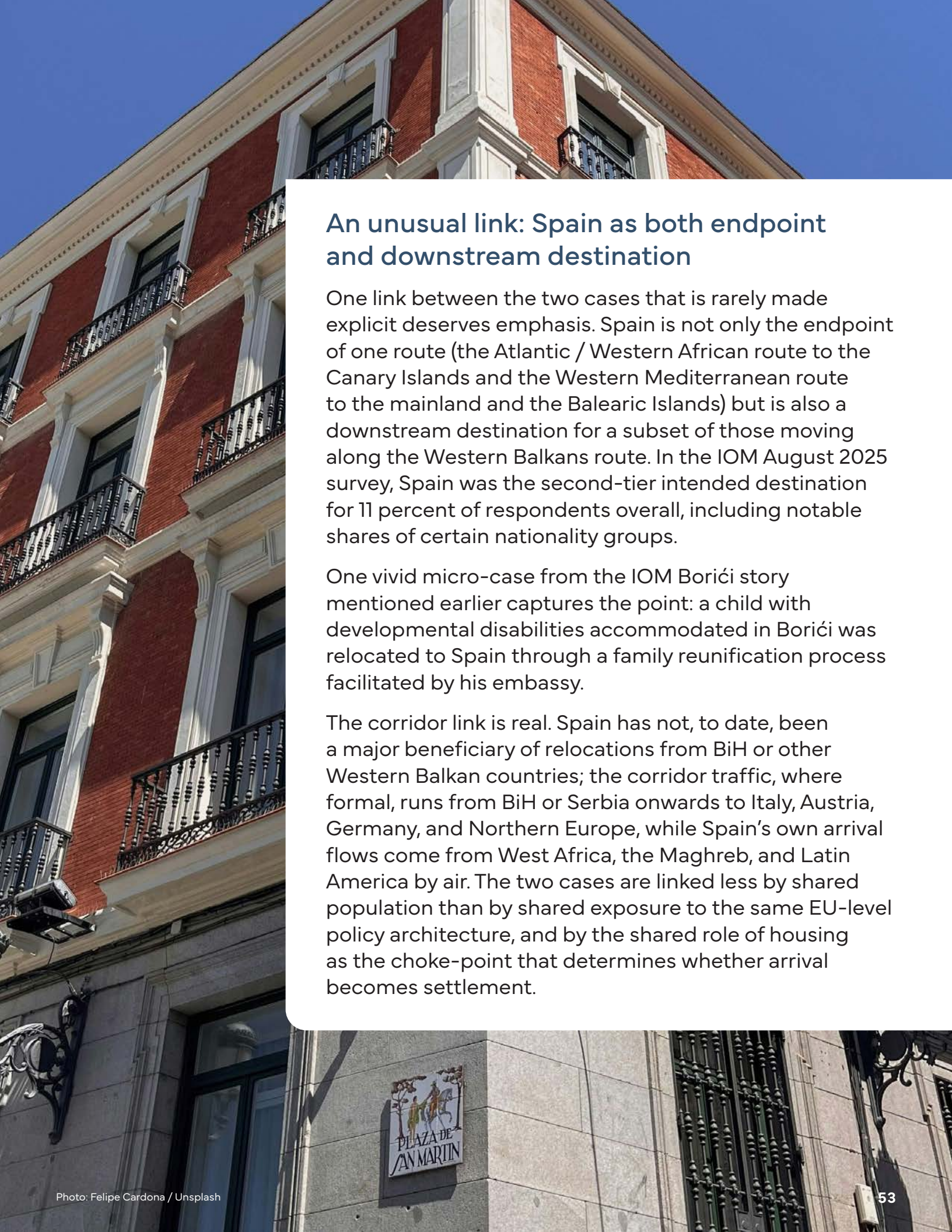


The BiH protection-holder population at the end of 2025 was smaller than the population of a single mid-sized Spanish reception center.

A second divergence concerns the relationship between the migration system and the local housing market. In Spain, the connection is direct: beneficiaries of protection exit the reception system into a private rental market characterized by high prices, low social-housing supply, and well-documented discrimination, with the Canary Islands case showing how a region-wide housing crisis interacts with the reception system to make exit impossible. In Bosnia, the formal reception system has almost no interface with the local housing market because people do not stay; the connection is instead through informal channels — the kindness of local people in Vikići near Bihać, ad-hoc rentals to undocumented Syrian workers in agriculture and construction — that operate outside both the asylum system and the housing market's formal economy.

A third divergence concerns the political character of opposition to expanded reception capacity. In Spain, opposition has been organized, electoral, and procedurally effective: PP and Vox have voted against UAM redistribution in Congress, have campaigned against the construction of new reception centers in cities including Vitoria, Logroño, Churriana (Málaga), Azuqueca de Henares, and Villablino, and have used regional and municipal elections to slow construction. In BiH, opposition is structural rather than electoral: Republika Srpska as an entity does not host TRCs, and the entire reception infrastructure operates within the Federation of BiH. Both countries thus exhibit a politics of sub-state veto over reception, but the mechanisms and remedies differ.

A fourth divergence — the most important from the whole-of-route perspective — concerns what happens to the people the system fails to absorb. In Spain, those who fall through formal reception either remain in the country, sometimes for many years, in conditions of homelessness, informal-settlement living, or precarious tenancy. In Bosnia, they move on: the country is, by design and self-identification, a transit point. The 50 percent of August 2025 IOM survey respondents who intended to reach Italy, the 21 percent intending to reach Germany, and the 11 percent intending to reach Spain are the population whose housing in BiH is by definition temporary. What happens to those people in BiH thus shapes what arrives downstream, and how, in ways that any genuinely whole-of-route policy would have to take seriously.



An unusual link: Spain as both endpoint and downstream destination

One link between the two cases that is rarely made explicit deserves emphasis. Spain is not only the endpoint of one route (the Atlantic / Western African route to the Canary Islands and the Western Mediterranean route to the mainland and the Balearic Islands) but is also a downstream destination for a subset of those moving along the Western Balkans route. In the IOM August 2025 survey, Spain was the second-tier intended destination for 11 percent of respondents overall, including notable shares of certain nationality groups.

One vivid micro-case from the IOM Borići story mentioned earlier captures the point: a child with developmental disabilities accommodated in Borići was relocated to Spain through a family reunification process facilitated by his embassy.

The corridor link is real. Spain has not, to date, been a major beneficiary of relocations from BiH or other Western Balkan countries; the corridor traffic, where formal, runs from BiH or Serbia onwards to Italy, Austria, Germany, and Northern Europe, while Spain's own arrival flows come from West Africa, the Maghreb, and Latin America by air. The two cases are linked less by shared population than by shared exposure to the same EU-level policy architecture, and by the shared role of housing as the choke-point that determines whether arrival becomes settlement.

THE WHOLE-OF-ROUTE TEST

Does the Approach Deliver Housing?

The litmus test proposed at the beginning of this report was that, if the whole-of-route approach is what its proponents claim, it should deliver concrete improvements in housing outcomes at multiple points along the corridor. If it is what its critics suspect, it should deliver improvements in border-management metrics combined with persistent or worsening conditions in informal housing. The Bosnian and Spanish cases together provide a preliminary empirical test based on the gathered evidence.

On the border-management metrics, the route-based approach seems to be delivering, at least according to official statistics. Detections of irregular crossings on the Western Balkans route fell 78 percent in 2024 and continued to fall in 2025 — however, as pointed out earlier, this drop may have more to do with the increased invisibility of displaced people than with an actual drop in arrivals; the Frontex Status Agreement with BiH has moved from initialing in December 2024 to a launched joint operation in November 2025; the BiH Law on Border Control was adopted in January 2025 in alignment with the EU acquis; the Spanish reception system has been significantly expanded under the Recovery and Resilience Plan with €215 million for new centers and €286 million in additional migration-emergency funds; the EU's 2026 solidarity pool will deliver up to 21,000 relocations or €420 million for the four states identified as under migratory pressure, including Spain.

On the housing metric at the periphery of the formal system, the picture is much less encouraging. Sixteen percent of IOM August 2025 survey respondents had slept outside or squatted in abandoned buildings in the Western Balkans; 4,600 people, including 1,800 children, remain without electricity in the Cañada Real informal settlement five years after the supply was cut; approximately 4,000 people are living in extreme conditions in the Almería informal settlement of Níjar; 240 asylum seekers were reportedly living on the streets in Alicante; the Canary Islands face the worst housing shortage in Spain, with rents averaging €1,128 in Las Palmas, and almost no realistic onward housing pathway from reception; 7 of 10 real-estate agencies in Spain admit explicit discrimination against migrants and refugees seeking to rent; beneficiaries of subsidiary protection in BiH are excluded from naturalization regardless of their length of stay; and unaccompanied minors continue to face a cliff-edge at the age of majority in both countries.

In short, the route-based approach as currently practiced does deliver partially on border management while underperforming on housing for the people whose movement it manages. There is a recognizable pattern. The formal reception architecture absorbs new arrivals well (which is a fraction of all arrivals, naturally), with international organization involvement and EU financing. The architecture then either passes them onwards (BiH) or transitions them to a private rental market where they are not equipped to be received on equal terms with nationals (Spain). The informal residual population in both countries — undocumented, in transit, between categories, or out of care — falls outside both the route-based architecture and the local housing system.

The implication for the case for scaled third-country housing solutions is twofold.

First, expansions of resettlement and complementary pathways are not, in themselves, a housing solution: a person resettled to a destination state that does not provide accommodation support is at risk of the same private-market discrimination as a person regularized in country. The Spanish data on housing access for protection-holders shows this clearly.

Second, however, scaled third-country housing solutions are a necessary part of any genuinely whole-of-route response because they are the only mechanism by which protection can be delivered without forcing people to spend 400 days on average — and Afghans 800 days — in informal shelter along the way.

It is worth noting that Spain has maintained a small but symbolically important resettlement program — 861 refugees from Lebanon and Costa Rica in 2025, with 30 percent women and 37 percent children — and that, by UNHCR's reading, this kind of pathway "guarantees protection to those most in need without having to risk their lives along the way."¹³⁶ What is missing is the scale: 861 resettled refugees against

¹³⁶ UNHCR, "Asylum Applications and Sea Arrivals Decline."

144,396 asylum applications in the same year, and against an estimated several thousand people in protracted transit in BiH and Serbia. Demographically, Spain has both capacity and need: the country added eight million inhabitants since 2000 entirely through immigration, has one of Europe's lowest birth rates, and 95 percent of new jobs created between Q1 2022 and Q1 2023 were filled by immigrants.¹³⁷ Demographic-change analyses at EU level identify migration as one of the levers, alongside higher participation and productivity, that Member States will have to use to sustain welfare, pension systems, and labor markets.¹³⁸

The arguments for and against expanded resettlement are partly framed in protection terms and partly in demographic terms. The housing case is what makes them operational.

¹³⁷ C. González Enríquez, *Immigration, Employment, Productivity and Inequality in Spain*, Real Instituto Elcano, 2023, available at: <https://www.realinstitutoelcano.org/en/analyses/immigration-employment-productivity-and-inequality-in-spain>; C. González Enríquez, *Highs and Lows of Immigrant Integration in Spain*, Real Instituto Elcano, 2016/2023, available at: <https://www.realinstitutoelcano.org/en/analyses/highs-and-lows-of-immigrant-integration-in-spain>.

¹³⁸ M.M. Mentzelopoulou, *Demographic Changes and Labor Migration Within the EU*, EPRS Briefing, European Parliamentary Research Service, April 2025, available at: [https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/769575/EPRS_BRI\(2025\)769575_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/769575/EPRS_BRI(2025)769575_EN.pdf).

The background image is a photograph of a building in poor condition. The upper portion shows a wall with severely peeling and cracked paint, revealing a mottled orange and grey surface. Below this, a section of the wall is constructed from rough-hewn, greyish-brown stones. The ground in the foreground is dirt and littered with some sparse green weeds and dry sticks. A blue and white striped cloth is draped over a doorway or opening on the left side of the stone wall.

Policy Recommendations

These recommendations are organized by actor and by the housing-protection junctions that emerged from the country cases and from the four interviews.

For destination governments expanding third-country pathways

1. **Link expansions of resettlement, family reunification, humanitarian admission, and community-sponsorship programs to dedicated housing-support packages in the destination state**, including:

- i. anti-discrimination enforcement against estate agencies and landlords with documented patterns of refusal to rent to refugees;
- ii. deposit guarantees and rental subsidies in markets where market entry is gated by upfront capital;
- iii. social-housing access on equal terms with nationals during the post-reception phase;
- iv. multi-year commitments by states and supra-national entities that allow municipalities, NGOs, and housing providers to plan capacity.

In Spain's case, the 2023 Housing Law and the 2024 Regulation of the Immigration Law provide legal anchors. What is missing is operational follow-through linking these instruments to international-protection housing pathways.

2. **Treat housing planning as a function of route-level information.** The IOM Western Balkans monthly survey already produces intended-destination data — including a quantifiable Spanish share — that destination governments could use to estimate medium-term capacity needs. UNHCR resettlement submissions could include a housing-readiness component, and EU Member States receiving solidarity-pool relocations in 2026 could be required to certify housing arrangements as a condition.

3. **Resource community-based housing approaches that already exist on a pilot basis.** The Provivienda housing specialist describes two innovative professional roles her organization is piloting: the “community connector,” used to match community resources to the needs of newcomers and facilitate welcoming conditions, and the “housing navigator,” a professional who accompanies families through the rental process and resolves barriers with landlords. She argues that both roles should be supported by public policy rather than left to NGO discretion. She also reports survey evidence that 4 percent of the Spanish population — equivalent to several million people — would be willing to personally engage their own funds to receive migrants, suggesting that government investment in matching platforms could mobilize a substantial civic resource. Drawing on her organization's experience with Ukrainian sponsorship arrangements, she emphasizes that community sponsorship requires professional accompaniment and mediation if it is not to fail in its first year.

For transit and host states (Bosnia and Herzegovina)

- 1. Sustain the state takeover of TRCs from 2026 without losing the operational standards built up under IOM management.** The EUAA Roadmap 2025-2027 provides a training framework; the BiH Migration and Asylum Strategy and Action Plan 2026–2030 will need to be backed by entity-level cooperation that has so far been absent in Republika Srpska. Reception capacity for unaccompanied minors and other vulnerable groups should be protected — diversified rather than consolidated where possible — and family-based and community-based alternatives developed alongside camp-based accommodation.
- 2. Address the asylum-processing backlog.** An average 441-day processing time from AISA issuance to first-instance decision is not consistent with the route-based approach's commitment to "fair and timely access to protection." Extending naturalization eligibility to beneficiaries of subsidiary protection, addressed through reform of the Law on Citizenship, would create a credible legal exit from the system for the few who do receive durable status.
- 3. Develop minimum shelter standards for informal accommodation that smugglers and facilitators are already arranging for transit populations.** This is the most difficult recommendation to articulate because the formal system cannot endorse the informal one without becoming complicit in it. But the August 2025 IOM data shows that 16 percent of facilitation services involve accommodation arrangements; a minimum-standards approach, jointly developed with civil society and outreach actors, would at least set a public benchmark against which conditions could be monitored. The CWS regional coordinator endorses, in this connection, the reallocation of "tens of millions of euros currently funneled to Bosnia for building fences" towards strengthening BiH's legal asylum teams — to allow more cases to be heard, processed swiftly, and to allow staff to receive EUAA training. The same logic would apply to investment in informal-shelter monitoring and outreach mobile teams of the kind CWS already deploys in Una-Sana.

- 4. Extend the Temporary Protection logic beyond Ukrainian beneficiaries.** The CWS regional coordinator notes that Bosnia and Herzegovina did not activate Temporary Protection for refugees from Ukraine — they instead stay on short-term renewable humanitarian residence permits — and that BiH “has the legal capacity within its law on asylum and migration to offer broader protection but has not extended these options to refugees and migrants other than Ukrainians.” Extending humanitarian residence with associated housing access to other protracted protection populations would convert the de facto presence of stateless and vulnerable people in BiH into a status with legal anchor and corresponding rights to access to private accommodation.

For frontier-arrival and resettlement states (Spain)

- 1. Treat the post-reception transition as a protection issue.** The reception itinerary should not end at the threshold of an undifferentiated private rental market; it should end at the threshold of a system of mediated housing access that NGOs are already attempting to provide on a voluntary basis. Anti-discrimination enforcement in the rental market is the threshold action, given the documented baseline that 7 of 10 estate agencies admit explicit discrimination; deposit guarantees, subsidized rents, social-housing pathways, and continued integration support beyond the reduced six-month post-recognition window described by the UNHCR Spain officer should follow. The Provivienda specialist points to a recently terminated example of what such transition support can look like in practice: a Swiss Embassy-funded project providing 18 months of structured transition support — including deposits and initial rent — for refugees with status leaving the system. That funding has been cut and redirected towards voluntary returns.
- 2. Use rural integration as a deliberate complementary track, but resource it.** The UNHCR Spain officer observes that initiatives moving migrants and refugees to low-population rural areas exist but are limited and not part of a large-scale policy, and that success requires substantial support across housing, employment, local services, and strong local commitment. In her assessment, success is more likely in larger villages (4,000-5,000 inhabitants) that still retain services rather than in tiny villages, and the Navarra community sponsorship initiative is one example where the necessary combination of good location, job opportunities, and local-government engagement aligned.

- 3. Extend care for unaccompanied minors past the age of 18 with continuity of accommodation.** The CEAR 2025 report's recommendations on *extutelados* — direct assignment from child-protection centers to international-protection reception once minors reach majority, avoiding the FVID provisional phase, and prioritizing large cities where support networks exist — should be implemented, and the “Emancípate,” “La Petite,” and IMEX models should be scaled with funding rather than left as voluntary projects.
- 4. Operationalize the JxCat–PSOE agreement on UAM distribution at speed.** The April 2025 lawmakers' approval of relocating thousands of unaccompanied minors from the Canary Islands and Ceuta to the rest of the country is a substantive shift, but implementation depends on the willingness of Autonomous Communities to act on the criteria of population, per capita income, unemployment, and existing intake. Federal funding for receiving regions should be guaranteed at levels that change the political incentives. Catalonia's commitment of between 20 and 30 minors out of nearly 6,000 illustrates that ambition will need to scale.
- 5. Accelerate the eradication of informal settlements as set out in the Andalucía Strategic Plan, with funding and timetables that match the scale of the problem.** The Cañada Real electricity case in Madrid demonstrates that a five-year-old crisis can be left unresolved without sustained federal political pressure.

For UNHCR and IOM

1. **Make housing a named component of the whole-of-route approach.** UNHCR's articulation of the approach as currently formulated has housing as an implicit element of emergency response. Bringing housing forward as an axis of policy in its own right would allow the agency to ask of every route-level intervention — including border-management deployments, return programs, smuggler-disruption operations — how it affects accommodation outcomes for people on the move.
2. **Use the existing data infrastructure.** The IOM Western Balkans monthly survey, the UNHCR BiH monthly update, the AIDA country reports, and the EUAA operational assessments are already collecting much of the data needed. What is missing is a route-level dashboard that brings together informal-shelter percentages, processing-time backlogs, housing discrimination indicators, and informal settlement headcounts so that the housing performance of the route as a whole can be tracked.
3. **Maintain advocacy for the credibility of the 1951 Convention and the asylum system,** as Tan has framed it. The housing case made in this report is part of the case for the system: housing failures are visible at the points where the asylum system either has not yet absorbed a person or has discharged them too early — not at its core.

For EU institutions

1. **Use the 2026 solidarity pool as a housing instrument, not only a relocation one.** Of the €420 million envelope, a portion should be earmarked for housing-related actions in beneficiary states (Cyprus, Greece, Italy, Spain), conditional on operational anti-discrimination and post-reception transition programs.
2. **Reframe Western Balkans cooperation to attach housing benchmarks to migration management investments.** The €100 million-plus invested in BiH since 2018 has built a reception system that meets technical standards but is not durable in its own right. Future tranches should include conditions on the BiH state-led model — on processing times, on diversification of reception for vulnerable groups, on naturalization eligibility — and should be matched by parallel investment in destination-state housing capacity to absorb the relocations and resettlements that route-level monitoring data identifies as needed.

CONCLUSION

From Crisis Management to Shared Responsibility for Where People Sleep

The cases of Bosnia and Spain, read together, show a whole-of-route approach that is doing one of the two things its proponents claim it should do. Border management is being coordinated, reception infrastructure is being financed and harmonized with EU standards, and the legal and institutional architecture of cooperation between the EU, Member States, and Western Balkans partners has thickened materially in 2024 and 2025. What it is not yet doing, based on the evidence assembled here, is delivering housing outcomes that match the protection mandate it asserts. In both countries, the people the formal system absorbs are accommodated well; the people it does not absorb — those without papers, those between categories, those aged out of UAM protection, those discharged from reception, those who never registered — are sheltered in informal arrangements that the same governments and international organizations have documented in detail and have not yet, on present trajectory, restructured.

The route-based frame does not, in itself, generate this gap. The frame is, as Sardelić and others observe, an analytic improvement on the country-by-country view of migration that still organizes most national debates; the corridor is real, and decisions taken in one country have measurable effects elsewhere along it.

What generates the housing gap is the asymmetry between the policy level at which migration is governed — national, supranational, route-level — and the policy level at which housing is administered — municipal, regional, market. The whole-of-route approach can be a mechanism for closing that gap, but only if its proponents are explicit that housing is part of what they are doing.



If they are explicit, the practical implications follow.

- **Resettlement and complementary pathways must be scaled and must come with housing. Housing must be an essential element of any protection scheme.**
- **Frontier-state reception must end not at the door of the rental market but at a mediated point of transition that anti-discrimination law, social housing access, and continued support make navigable.**
- **Transit-state reception must be diversified rather than consolidated, must be designed with the actual transit population in mind** rather than only with the small asylum-claim population, and must **include shelter standards** that reach the population currently using abandoned buildings, smuggler-organized flats, and informal settlements.
- **Unaccompanied and separated children must be supported across the age of majority threshold with continuity, not cliff-edges.** Demographic-change considerations — the labor-market and welfare-state case for migration in the receiving countries — must be brought into the same conversation as protection-system considerations, so that the architecture of resettlement and the architecture of housing inform each other.

The alternative — what the report has called the containment reading of the whole-of-route approach — is the trajectory the system is on if these adjustments are not made.

The 2024-2025 evidence suggests it is a trajectory of falling border-detection numbers, rising informal-shelter use, growing smuggler involvement in accommodation provision, persistent and in some places worsening conditions in informal settlements, and a route-level architecture that performs well on its own metrics while leaving the housing question unattended. The Bosnian transit population and the Spanish post-reception population are the principal carriers of that failure mode.

Bringing housing back into the center of the route-based approach — naming it, measuring it, financing it, and conditioning policy on it — **is the most direct way of changing the trajectory.**



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About GRAWG

The Global Refugee Accommodation Working Group (GRAWG) was born during the 2023 Consultations on Resettlement and Complementary Pathways (CRCP), formerly known as the Annual Tripartite Consultations on Resettlement (ATCR). Stakeholders from across the globe observed that housing was one of the most pressing issues for resettlement States, yet prior to 2023 housing had not been a dedicated focus within the CRCP or any other high-level global forum on resettlement. To raise the visibility of this issue and begin to address it, Church World Service (CWS), with the support of the 2023 CRCP co-chairs (the Government of Ireland's Irish Refugee Protection Programme, or IRPP, and Nasc, the Migrant and Refugee Rights Centre in partnership with UNHCR), issued a global call to action at the plenary session of the 2023 ATCR to establish a dedicated task force on housing.

Since 1995, the ATCR — renamed CRCP in 2023 — has served as a multilateral forum for UNHCR, States, NGOs, the private sector, academia, and refugees, convening annually to address refugee resettlement. In 2020, a Steering Committee was created to gather and submit reform proposals to the ATCR, and one of those recommendations was to create opportunities for strategic priorities identified at CRCP meetings to be explored within current or new working groups and task forces. Housing for refugees emerged through this process as a shared concern among States, NGOs, and refugee-led stakeholders, and following the 2023 plenary, CWS and Ireland became the inaugural co-chairs of the new task force. In November 2023, the task force held its first meeting, during which it adopted its terms of reference and formal name: the Global Refugee Accommodation Working Group.

Although GRAWG emerged through the CRCP process and continues to play a significant role within it, the working group has evolved into a standing body with its own program of member meetings, webinars, symposia, and related activities beyond CRCP convenings. Since 2023, GRAWG has steadily grown its membership and established itself as the go-to platform for stakeholders seeking models, new ways of thinking, and effective solutions to the problem of finding safe, affordable, and decent housing for resettled refugees and other newly arrived persons across the globe.

Mission

GRAWG leads global cross-sector coordination, communication, and collaboration to identify and innovate opportunities to address refugee accommodation and housing challenges.

Purpose

To ensure cross-sector global coordination, communication, and collaboration to identify and innovate opportunities to address refugee accommodation and housing challenges. To pursue its purpose, group leaders undertake the following activities: convene key sectoral stakeholders globally in a forum that meets regularly for sharing and learning; promote innovative affordable accommodation and housing responses and solutions for refugees and other newly arrived persons in countries beyond their own; use a real-time, interactive communication platform and protocols for the Working Group and sub-groups; and use an information-data platform to track global accommodation and housing information, challenges, solutions, opportunities, and successful initiatives.

Scope

The Working Group initiates regular GRAWG meetings on a shared workspace for the Group's conversations, consultations, continuing education, and training; with UNHCR support and concurrence, initiates other accommodation- and housing-related conversations and consultations for (1) all resettlement States — large and small alike, (2) academia, and (3) the NGO/non-profit sector; regularly reviews accommodation and housing challenges and needs (both temporary and long-term) and identifies ways to improve the situation for refugees by sharing best-practice ideas, innovations, and solutions; monitors the interactive communications platform; and shares analyzed data as relevant.

Leadership and Members

GRAWG is led by Church World Service as permanent Co-Chair and Secretariat, and it was formally co-chaired alongside the Government of Ireland (the Irish Refugee Protection Programme). Both were inaugural and foundational co-chairs for two years during the launch and buildup of GRAWG. CWS remains the permanent Co-Chair and Secretariat of the working group, leading activities such as developing annual project outcomes, website maintenance, and meeting facilitation, and is actively seeking the support of a State Co-Chair to increase visibility, credibility, and reach among other State actors. As of May 2026, GRAWG is in the process of identifying a new government Co-Chair following the two-year term served by the Government of Ireland.

Members of GRAWG include participating resettlement State agencies from around the world, UNHCR, and local and international NGOs involved in resettlement efforts, with more than 18 countries represented. Members attend different types of convenings (either virtual or in-person) annually, including symposia and webinars. GRAWG continuously adds country involvement through the expression-of-interest form on its website, and has to date drawn representation from Ireland, Belgium, the United Kingdom, Australia, Spain, Japan, Portugal, France, Norway, Sweden, the Netherlands, Canada, Switzerland, the United States of America, Argentina, and New Zealand.



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