

Local and regional governments in the implementation of the EU pact on migration and asylum

First assessment of roles, responsibilities and challenges at the territorial level

Key asks:

The findings of this report indicate that while local and regional governments already play a central role in the practical implementation of migration and asylum policy, this role remains insufficiently reflected in the governance, funding and monitoring arrangements of the EU Pact on Migration and Asylum. The following recommendations should be put forward to address these structural gaps.

1. **Formal recognition of the local and regional governments in the Pact's governance architecture:** Local and regional governments should be formally recognised within the Pact's governance framework, ensuring their meaningful involvement in both the design and implementation phases, rather than limiting their participation to informal or consultative arrangements.
2. **Greater coherence in EU funding instruments:** Synergies between AMIF, ESF+ and other relevant EU funds should be strengthened through a more integrated and place-based approach, with local and regional governments more closely involved in identifying needs and target groups.
3. **Systematic monitoring of local and regional implementation:** Existing Pact monitoring mechanisms should be extended to track implementation at local and regional level, and not solely national legal transposition and central-level preparedness, to capture operational realities more accurately.
4. **Investment in local and regional capacity:** Adequate and predictable funding, sufficient staffing, and clearer national guidance should be provided to local and regional authorities, so that the responsibilities placed upon them are matched by the resources required to fulfil them effectively and sustainably.

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Foreword

At a time when Europe is entering the implementation phase of the Pact on Migration and Asylum, one reality stands out: migration governance is shaped not only in Brussels and national capitals, but also in our cities, municipalities and regions.

Local and regional governments are at the forefront of reception, integration and social cohesion. Every day, they translate European and national frameworks into concrete realities on the ground by providing housing, ensuring access to education and healthcare, supporting integration, and fostering social cohesion within increasingly diverse communities. Their work is essential to making migration policies not only effective, but also humane and sustainable.

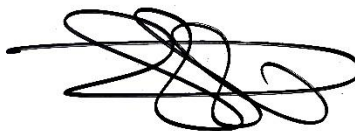
The adoption of the Pact in 2024 marked an important milestone for the European Union. It aims to strengthen coordination, predictability and solidarity in the management of migration. As this report rightly points out, however, the success of the Pact will ultimately depend on how it is put into practice across the different levels of governance; in particular on the ability of local and regional authorities to fulfil their role.

The report highlights that the local dimension is often overlooked in migration policymaking and offers valuable insight into the realities faced by local and regional authorities. It reminds us that beyond legal frameworks, successful implementation is first and foremost about people, services and territories. If the Pact is to deliver on its ambitions, local and regional authorities must be recognised as full partners in its governance. This means involving them in the design and implementation of national plans in a meaningful way, strengthening multi-level coordination, and ensuring adequate and accessible funding to support their work on the ground.

It is nevertheless important to recall that the implementation of the Pact can only be fully aligned with the European Union's fundamental values if it remains rooted in the principles of reception, hospitality and inclusion that lie at the heart of the European project. In its current form, some aspects of the Pact risk moving away from this ambition by placing greater emphasis on migration flows management and control, rather than on the protection of people and the building of inclusive societies.

This report is therefore both a diagnosis and a call to action. It invites European institutions, national governments, and all stakeholders to place local and regional governments at the heart of migration governance, where in practice they already are.

Only by working together across all levels of governance will we be able to ensure that the Pact delivers on its promise: a fair, effective and resilient European migration system.



Antoine Le Solleuz
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Deputy Mayor of Nancy
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Executive summary

This report examines the role, challenges and needs of local and regional governments (LRGs) in the implementation of the European Union's Pact on Migration and Asylum. Drawing on a survey of CEMR members, direct exchanges with local and regional representatives, and complementary desk research, it provides an overview of progress in preparing for the Pact's application across different levels of governance and explores how LRGs have been involved in this process.

The findings confirm that local and regional governments are already central actors in migration and asylum governance. Even before the adoption of the Pact, municipalities and regions played a key role in areas such as integration, housing, education, social services, health care and support for vulnerable groups. While the Pact does not appear to alter the formal distribution of responsibilities fundamentally, respondents generally expect local and regional involvement to remain stable or increase, particularly in policy areas that require direct service delivery and long-term integration measures.

At the same time, the report identifies a significant gap between the responsibilities assumed by local and regional authorities and their role within the Pact's governance framework. Although LRGs are essential to implementation, their involvement in the design, negotiation and national implementation processes has often been limited, uneven and largely consultative. In many countries, local and regional authorities report insufficient participation in strategic planning and limited opportunities to influence national preparations for the Pact's application.

The research also highlights persistent challenges related to governance and coordination. Information flows between levels of government are often fragmented, responsibilities remain unclear in several Member States, and many local authorities lack precise guidance regarding their future obligations. This uncertainty contributes to difficulties in planning, resource allocation and capacity building.

A second major finding concerns the mismatch between responsibilities and available resources. Across the countries surveyed, local and regional governments report limited access to dedicated funding, insufficient staffing levels, and restricted capacity to scale up services in response to new demands. Existing support measures remain fragmented and often fail to reflect the reality that integration and many migration-related services are delivered primarily at the local level. As a result, a significant local capacity gap persists between the expectations placed on LRGs and the means available to fulfil them.

The report further reveals widespread concerns regarding the feasibility of the Pact's implementation timeline. For most respondents, the June 2026 deadline appears challenging due to staffing shortages, insufficient national guidance, delayed preparations and limited administrative capacity. Pressures are expected to be particularly acute in areas such as integration, housing, social services, coordination and resource management.

Despite these challenges, the research also demonstrates the resilience and adaptability of local and regional governments. Experiences such as the response to the displacement of people fleeing Ukraine illustrate that local authorities can mobilise rapidly and effectively when necessary. However, such efforts often rely on extraordinary measures and are difficult to sustain without stronger institutional support.

Overall, the report concludes that the success of the Pact will depend not only on legal transposition and national preparedness, but also on the capacity of governance systems to fully integrate local and regional authorities into implementation processes. Strengthening multi-level governance, improving coordination, clarifying responsibilities and ensuring adequate resources will be essential to translating the objectives of the Pact into effective outcomes on the ground.

Policy recommendations

The findings presented in this report point to a series of structural challenges that may affect the effective implementation of the New Pact on Migration and Asylum at local and regional level. While local and regional governments (LRGs) are already playing a central role in the reception, inclusion and support of migrants and asylum seekers, the questionnaire results reveal persistent gaps in governance arrangements, funding structures and implementation processes. These challenges are not merely operational; they reflect broader tensions between the responsibilities entrusted to local authorities and the recognition, resources and coordination mechanisms available to them. Building on the evidence collected, this chapter sets out several policy recommendations aimed at strengthening the role of LRGs within the Pact's implementation framework and promoting a more coherent and effective system of multi-level governance.

First, the questionnaire highlights a clear mismatch between the central role already played by LRGs in migration and asylum management and the limited recognition they receive in the Pact's governance framework. While LRGs are already deeply involved in implementation on the ground, their role remains insufficiently reflected in formal decision-making structures.

- ⇒ **Recommendation: Formally recognise local and regional governments in the governance architecture of the Pact, thus ensuring their meaningful involvement in both the design and implementation phases.**

Second, the findings relating to the mismatch between responsibilities and resources also point to a broader issue of fragmentation and limited coordination between EU funding instruments supporting migration and inclusion policies. While these funds pursue complementary objectives, their articulation remains insufficient, reducing their impact at the local level. At the same time, the questionnaire confirms that the socio-economic integration of third-country nationals primarily takes place at the local and regional level, where authorities deliver key services such as housing, education and social support. However, this role is not always sufficiently reflected in the design and targeting of EU funding programmes.

- ⇒ **Recommendation: Strengthen synergies between AMIF, ESF+ and other relevant EU funds by promoting a more integrated and place-based approach. This should include greater involvement of local and regional governments in identifying needs and target groups, as well as funding mechanisms better aligned with locally delivered integration measures.**

Third, the report reveals a persistent issue of operational ambiguity, despite the existence of formal legal frameworks. Local and regional governments often face unclear guidance, fragmented responsibilities, and limited involvement in national implementation processes. This lack of clarity risks undermining effective implementation on the ground.

⇒ **Recommendation: Ensure that existing Pact monitoring mechanisms systematically track local and regional implementation, and not only national legal transposition and central-level preparedness, to better capture operational realities and improve coordination.**

Beyond these recommendations, the report calls more broadly for the implementation of the Pact to be reexamined as a genuine exercise in multi-level governance. Without stronger investment in local and regional capacities, better articulation between levels of decision-making, and greater recognition of the role of local authorities, there is a risk that the ambitions of the Pact will come up against the very concrete limits of its implementation on the ground. Conversely, making LRGs full partners in this reform would constitute a key asset in ensuring that the new European framework on migration and asylum is implemented in a more effective, coherent and sustainable way.

Understanding the Pact: why local and regional governments matter

After years of political disagreement and protracted negotiations, the European Union has adopted the EU Pact on Migration and Asylum, a comprehensive reform intended to strengthen the coherence and resilience of EU migration and asylum policy. This Pact represents a major overhaul of the existing framework and a key step in the evolution of the Common European Asylum System (CEAS).

The legislative package was approved by the European Parliament in April 2024¹ and formally adopted by the Council of the European Union in May 2024². The new rules entered into force on 11 June 2024³ and became applicable in June 2026. In parallel, the European Commission adopted the Common Implementation Plan for the Pact on Migration and Asylum⁴ in June 2024, marking the transition from political agreement to the implementation phase.

The Pact establishes a common framework for managing migration and asylum across the EU, with the stated objective of enabling a more coordinated, predictable and effective response to current and future challenges. It introduces new rules and procedures covering the full migration cycle, from arrival and screening to asylum procedures, integration or return.

The Pact is based on 5 strategies⁵:

- “Stepping up Migration Diplomacy”
- “Strong EU borders to enhance control and security”
- “A fair, firm and adaptable asylum and migration system”
- “More effective return and readmission”
- “Labour and talent Mobility to boost competitiveness”

Taken together, these elements underline the scale and ambition of the Pact.

However, its successful implementation will depend not only on legislative transposition at national level, but also on the capacity of governance systems to translate the new rules into practice across all relevant policy areas and levels of government.

¹ European Parliament. (2024, 10 avril). *MEPs approve the new Migration and Asylum Pact*. <https://www.europarl.europa.eu/news/en/press-room/20240408IPR20290/meps-approve-the-new-migration-and-asylum-pact>

² Council of the European Union. (2024, 14 mai). *The Council adopts the EU's Pact on Migration and Asylum*. <https://www.consilium.europa.eu/en/press/press-releases/2024/05/14/the-council-adopts-the-eu-s-pact-on-migration-and-asylum/>

³ European Commission, Directorate-General for Migration and Home Affairs. (2024, June 12). *Common Implementation Plan to turn the Pact on Migration and Asylum into a reality*. https://home-affairs.ec.europa.eu/news/common-implementation-plan-turn-pact-migration-and-asylum-reality-2024-06-12_en

⁴ European Commission. (2024, June 12). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Common Implementation Plan for the Pact on Migration and Asylum* (COM (2024) 251 final). EUR-Lex. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2024%3A251%3AFIN>

⁵ European Commission. (2026, January 29). *Communication from the Commission to the European Parliament and the Council: European Asylum and Migration Management Strategy* (COM(2026) 45 final). https://home-affairs.ec.europa.eu/document/download/ce0d294e-5dd9-4e2a-bf68-53d9d16fc95a_en?filename=Europea%20Asylum%20and%20Migration%20Strategy.pdf



Figure 1: Timeline of the transition period – Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions “State of the play on the implementation of the Pact on Migration and Asylum (11.6.2025)

In its communication State of play on the implementation of the Pact on Migration and Asylum”⁶ published on 11 June 2025, the European Commission emphasised that the Pact’s success will depend on the effective involvement of a broad range of actors, including local and regional authorities: “though migration or interior ministries will lead, involvement from other ministries, the judiciary, and **local authorities is essential**. The Commission welcomes and continues to call for good coordination with all stakeholders, and the **involvement of local and regional authorities**, as well as civil society, to achieve a high level of efficiency when implementing the Pact.”

⁶ European Commission. (2025, June 11). *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: State of play on the implementation of the Pact on Migration and Asylum* (COM(2025) 319 final). EUR-Lex. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0319>

Against this backdrop and building on its previous Position⁷, CEMR is publishing this report, which aims to assess how LRGs have been involved in preparing for the implementation of the Pact and to provide an evidence-based understanding of their role, challenges, and needs ahead of its application in June 2026.

More specifically, the report seeks to:

- 1) Map the current level of involvement of local and regional governments in the implementation of the Pact;
- 2) Identify the main challenges they face in practice;
- 3) Assess the adequacy of the resources and governance frameworks available to them;
- 4) Formulate key recommendations to support more effective, coordinated, and sustainable implementation.

By documenting the realities on the ground, this report aims to strengthen the evidence base on the local dimension of migration governance and to support CEMR's advocacy efforts. It is intended both as a knowledge tool and as a policy instrument to inform European and national decision-makers in the final phase of the Pact's implementation.

Methodology

This report is based on the results of a comprehensive questionnaire circulated among CEMR member associations to collect first-hand information on the role of LRGs in the implementation of the Pact. The questionnaire was structured into four main parts, reflecting the different dimensions of implementation:

- **Part 1** focused on local responsibilities in migration and asylum, and it aimed to clarify who does what across the municipal, intermediate and regional levels, both before the Pact and in the context of its implementation.
- **Part 2** addressed multi-level governance and involvement. It examined whether local and regional governments are aware of their responsibilities, whether roles are clear, how information circulates, and to what extent local authorities are involved in national implementation processes.

⁷ Council of European Municipalities and Regions. (2025, June 25). *Position paper on migration*. <https://ccre-cemr.org/impact-community-society/migration-impactgoal-society/position-paper-on-migration>

- **Part 3** focused on resources. It looked at staffing, funding, training, operational tools, and the capacity of local authorities to scale up if needed.
- **Finally, Part 4** examined the local impacts of the Pact, including the areas where challenges are likely to be felt most strongly and the kinds of support local authorities would need to implement the Pact effectively

Overall, the questionnaire's objective was to follow a clear analytical logic, moving from responsibilities to governance arrangements, to resources, and finally to local impacts.

Only complete answers were considered for analytical and reporting purposes.

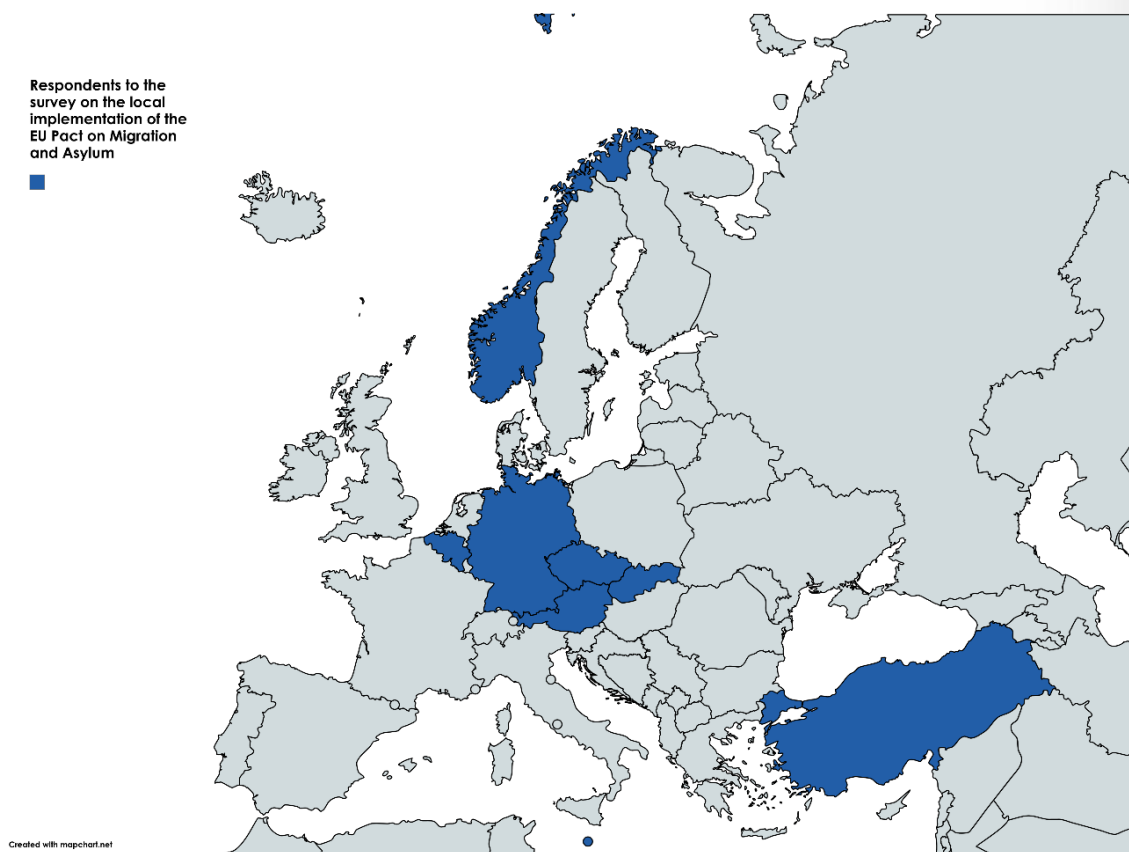


Figure 2: Map showing the countries' responses to the survey on the local implementation of the EU Pact on Migration and Asylum (15.6.2025)

The findings of the questionnaire were also complemented by direct exchanges with CEMR members, which provided qualitative feedback on their experiences and helped contextualise the challenges they face in implementing migration and asylum policies at local and regional levels. These exchanges helped to enrich the analysis and to capture practical insights that may not be fully reflected in survey responses alone.

The questionnaire yielded a limited number of responses (eight in total). While this sample size does not allow for a statistically representative overview of the situation across Europe, it nevertheless provides valuable qualitative insights into how local and regional governments were preparing for the implementation of the Pact and the challenges they anticipated in applying the new migration and asylum framework.

The findings presented in this report should therefore be read as indicative of emerging patterns, shared challenges and areas of concern, rather than as an exhaustive assessment of implementation across all Member States. In this sense, the results offer an informed snapshot of local and regional perspectives at a critical moment as the new framework moved towards practical application.

Editorial note:

Throughout the report, three levels of local and regional government are distinguished: the municipal level, the intermediate level, and the regional level. These distinctions are based on the definitions used by the OECD.⁸ for local, intermediate and regional government and are applied consistently across the analysis.

PART 1: Local and regional responsibilities under the Pact

Before assessing the impact of the New Pact on Migration and Asylum, it is necessary to establish a baseline of how responsibilities in the field of migration and asylum were distributed across the different levels of government before the Pact entered into force.

Based on the survey responses, responsibilities already existed at several subnational levels, although their distribution varied depending on policy areas and national governance structures. For instance, municipal

⁸ OECD. (n.d.). *OECD geographical definitions*. <https://www.oecd.org/en/data/datasets/oecd-geographical-definitions.html>

authorities were identified as having responsibilities in the field of migration and asylum in 62,50% of cases, regional authorities in 87,50%, and intermediate levels in 25% of cases, with the latter also frequently reported as not applicable.

A closer examination of the formal allocation of tasks shows that local and regional responsibilities were particularly prominent in areas related to service provision and longer-term inclusion. Integration and housing support after reception emerge as the most widely shared areas of responsibility, especially at municipal level, where both were identified by 87.5% of respondents. Municipal responsibilities are also frequently reported in social services, education, health services, as well as support for unaccompanied minors, each cited by 75% of respondents. By contrast, administrative registration and first contact appear to be more centralised functions, with only 50% of respondents identifying them as a municipal responsibility and 25% as a regional one. Reception and accommodation also appear less uniformly localised, displaying more mixed patterns across governance levels.

Overall, these findings suggest that responsibilities are shared across different levels of governance. Qualitative responses further indicate that while the national level often retains formal authority over key asylum and migration procedures, subnational authorities are expected to manage a large share of the practical and social consequences of the arrival and settlement of migrants.

KEY EXAMPLES

The national examples collected through the survey clearly illustrate the diversity of governance arrangements.

> In Belgium, the initial reception of asylum seekers is organised at federal level in collective centres (although there are just as many asylum seekers outside the reception centres as there are inside). Following a positive decision, as well as for people from countries where the rate of positive decisions is 80% for those with (medical) vulnerabilities, reception is provided on an individual basis, mainly organised by the local authorities. These authorities help to find accommodation, provide social benefits and ensure all other forms of support. This is the same support offered to Belgians in need. It is also at local level that the integration process often begins, whilst awaiting the launch of the official integration procedure (inburgering) organised by the Flemish Region.

- > In the Czech Republic, responsibilities in the field of migration and asylum are described as highly centralised at national level, particularly about asylum procedures, reception, migration policy and residence permits. Municipalities and regions are primarily responsible for service provision and integration support.
- > In Austria, responsibilities shift across levels depending on the stage of the process: initial reception is organised at federal level, asylum seekers are subsequently distributed among the Länder according to a specific quota, and following the granting of a status, responsibility lies with the Länder.
- > Germany is described as having a differentiated system in which responsibilities vary depending on individuals' legal status.
- > Slovakia points to a configuration in which local authorities ultimately assume a substantial share of responsibilities in practice, depending on available capacities.
- > Norway occupies a somewhat unique position in the sample: while it is not an EU Member State, it is part of the Schengen area and the EEA, meaning that the Pact applies only partially. Norway nevertheless presents a relatively centralised asylum system, in which the state manages asylum procedures, returns and reception centres, while municipalities are responsible for services such as health, education, integration measures and housing for refugees who are granted the right to stay.

One of the main findings emerging from these responses is the gap between the formal distribution of responsibilities and how governance operates in practice. Even where competences are legally centralised, local and regional authorities often play a decisive role in implementation, particularly through mainstream public services. This illustrates how local actors may carry a significant implementation burden even in the absence of a clear or comprehensive formal mandate. The Czech case highlights this discrepancy between formal authority and practical responsibility. While decision-making remains highly centralised within the Ministry of the Interior, municipalities and regions play an important role in ensuring access to education, social services, local integration activities, public order, healthcare coordination and other essential services. Integration is therefore largely implemented at the local level, often on a voluntary or project-based basis, and is highly dependent on territorial capacities. This results in a system in which the

state retains strategic control, while local and regional authorities are indispensable to day-to-day implementation.

Overall, these results point to a governance landscape in which regional and municipal players already occupied a central role (whether clearly defined and regulated or not) in the management of migration and asylum issues before the implementation of the Pact.

What will change? Expected shifts under the Pact

Given the central role played in the management of migration and asylum before the implementation of the Pact by LRGs, the aim of the research was to determine whether the implementation of the Pact was likely to alter the distribution of responsibilities between the different levels of governance. While the results do not point to a major restructuring of competences, they nonetheless suggest that local and regional governments anticipate either continuity or a gradual increase in their role, rather than a reduction in their responsibilities.

Indeed, across almost all policy areas and governance levels, the dominant responses are “unchanged” or “increased.” The data do not reveal any clear expectation of a systematic decrease in responsibilities. At the municipal level, the most frequent response in areas such as housing support, social services, education, health, support for unaccompanied minors and integration is that responsibilities will remain the same, while approximately 15% of respondents anticipate an increase in each of these areas. Similar patterns can be observed at the regional level, where “unchanged” is also the prevailing response in key sectors such as reception, education, health and support for minors.

At the same time, the data do not indicate a perception that responsibilities will decrease. For most policy areas, the “decreased” option received no responses. The only partial exceptions concern administrative registration and first contact, where a small share of respondents anticipate a decrease at the municipal and regional level. This remains marginal, however, and does not alter the overall picture: respondents expect the Pact to maintain or increase subnational responsibilities rather than to lead to recentralisation.

The policy areas most likely to experience an increase in responsibilities are those already closely associated with local implementation capacities, namely social services, education, health, integration, and local policing/public order. Even where such an increase is anticipated by only a minority of respondents,

the recurrence of these responses is significant, as they cluster around sectors that are already largely managed by local and regional authorities.

An important element to highlight in this section is the very high non-response rate, which reaches 43% or 57% in many categories depending on the level of governance and policy area. It can be hypothesised that this high non-response rate reflects uncertainty rather than an absence of expected change. This interpretation is reinforced by other findings from the questionnaire, particularly in Parts 2 and 4, where respondents refer to limited clarity of responsibilities, insufficient national guidance, and uneven involvement of local and regional authorities in implementation processes. In other words, uncertainty regarding future responsibilities emerges as a key finding in its own right.

KEY EXAMPLE: Czech Republic

The Czech response indicates that, at this stage, no major formal changes in the distribution of responsibilities have been introduced in connection with the Pact. At the same time, it underlines that political debates remain intense and that implementation modalities are still unclear.

If local and regional responsibilities were to increase under the Pact, the survey responses suggest that the main challenge would lie not in willingness to act, but in the capacity to do so. The Czech response, for example, provides a relatively detailed account and identifies insufficient administrative and service capacities as the primary constraint. This includes staff shortages within local administrations, as well as limitations affecting essential public services such as education, social support and housing.

Overall, the research leads to a clear conclusion: even if the Pact does not fundamentally alter the formal division of responsibilities, it is likely to consolidate or intensify the role of local and regional authorities in implementation. The baseline already shows that municipalities and regions are deeply involved in integration, housing, social support, education and health. The expected developments under the Pact therefore suggest continuity rather than rupture, but also the prospect of increasing pressure on local systems. In this sense, the central question is not so much whether local responsibilities will exist, but rather whether local and regional authorities will have the resources, clarity and support necessary to assume them effectively.

PART 2: Are local and regional governments really part of the process?

In this section, we seek to analyse the extent to which LRGs have been involved in the governance and implementation of the European Pact on Migration and Asylum. The analysis focuses on two main dimensions: on the one hand, the degree of LRG involvement before and during the negotiations of the Pact, as well as in national implementation processes; on the other hand, the quality of information flows, the level of awareness of the Pact, and the clarity of responsibilities at local and regional level. Overall, the findings point to limited, uneven and often indirect involvement of LRGs, raising questions about their effective integration into the Pact's multi-level governance mechanisms.

LRGs' involvement before and during the pact negotiations

Major findings highlight that the involvement of local and regional governments during the negotiation and drafting phases of the Pact was both limited and uneven across countries. While 37,50% of respondents indicate that LRGs were consulted "to some extent", 50% report that they were not consulted at all. In addition, approximately 12,50% of respondents refer to involvement that was informal or ad hoc only. These results suggest that consultation of LRGs was neither systematic nor structured at European level.

Where forms of involvement did exist, they took a variety of shapes. Some respondents mention participation in formal consultations organised by national governments, involvement in national expert or working groups, or the submission of written contributions at the request of national authorities. However, these channels were far from universal: nearly 37,50% of respondents report having experienced no form of involvement whatsoever. This highlights a fragmented consultation landscape, in which opportunities for LRGs' input depend largely on national contexts rather than on a common approach to Pact governance.

Perceptions of the actual impact of this involvement on the final text of the Pact further reinforce the conclusion that it was limited. Among respondents, 37,50% consider that local and regional perspectives were considered only minimally, and the same proportion believe that they were not taken into account at all. Taken together, these findings show that even though LRGs are central actors in implementation, their capacity to influence the design of the Pact appears to have been very limited.

Concerning the implementation phase, the survey indicates that the involvement of local and regional governments remains partial and highly uneven across countries. The level of involvement varies

considerably: for example, in Austria, LRGs are described as being minimally involved; in Germany and Malta, their involvement is considered partial; while in the Czech Republic, LRGs are reported as not being involved at all in the national implementation process. These differences illustrate the absence of a shared approach to integrating LRGs into the implementation of the Pact.

As regards concrete forms of involvement, some mechanisms do nonetheless exist. Austria and Germany refer to data-sharing or coordination systems involving LRGs, while consultations on national roadmaps or implementation plans are reported in Germany, Slovakia and Malta. However, these forms of engagement remain primarily consultative or technical in nature.

A central finding emerges from all responses: the existence of a “missing link” in multi-level governance. Indeed, no country reports the involvement of LRGs as formal co-designers of national implementation plans. This suggests that even where consultation or coordination mechanisms are in place, local and regional governments are rarely directly involved in the strategic definition of implementation from the earliest stages.

Information flows, governance and clarity of responsibilities

Key findings show a wide diversity of channels through which LRGs are informed about developments related to the Pact and the obligations arising from it. The main channels mentioned include official circulars or formal notifications issued by national authorities, emails from ministries as well as the intermediary role played by regional authorities. National associations of local and regional governments are also cited in some cases, along with informal networks and professional contacts. Finally, several respondents indicate that the press and media constitute an additional source of information.

While this diversity of channels may appear positive at first glance, the circulation of information often seems fragmented, indirect, and highly dependent on national administrative practices. Indeed, these communication challenges are reflected in the levels of awareness of the Pact and in the perceived clarity of responsibilities at local and regional level. Only Austria reports both high levels of awareness and clear responsibilities. By contrast, Germany and Slovakia are characterised by low awareness and responsibilities considered unclear or evolving. The Czech Republic occupies an intermediate position, with a moderate level of awareness and only partial clarity of responsibilities.

Respondents identify several main causes for this lack of clarity. The most frequently cited relates to unclear operational expectations. This is followed by uncertainty regarding funding roles (37,50%), lack of clarity in legal obligations (37,50%), and the fragmentation of tasks across different levels of governance (25%). Overall, these findings suggest that uncertainty does not stem from a single factor, but rather from a combination of legal, financial, and operational ambiguities. This situation has concrete implications for local and regional governments. When responsibilities are poorly defined, LRGs may face difficulties in anticipating needs, planning their actions, or scaling up their capacities. This reinforces the perception that local authorities are expected to act on the ground without a sufficiently clear or secure framework.

Finally, the results provide an overview of the current state of preparedness for the application of the Pact across different countries, which helps to contextualise the findings above. Austria is described as being at an advanced stage of preparation, while Germany and Malta are in an intermediate phase, with national implementation measures ongoing. The Czech Republic remains at an initial stage, while Slovakia reports no visible progress to date. These differences in the progress of national implementation preparations may help explain the variations observed in awareness, clarity of responsibilities and the involvement of LRGs. In countries where preparation is more advanced, communication structures and role definitions appear to be more developed. Conversely, where preparations had only just begun or had made little progress, uncertainty and limited involvement of local and regional governments are particularly pronounced.

Taken together, the findings of this section suggest that local and regional governments are not yet fully “in the loop” of Pact governance and implementation. Although they are central actors in practice, their involvement in decision-making, coordination, and strategic planning remains limited, uneven, and often indirect. Information flows remain fragmented, levels of awareness and clarity of responsibilities vary significantly across countries, and formal mechanisms for co-design with LRGs are largely absent. This situation raises important questions regarding the effectiveness and sustainability of the Pact’s multi-level governance arrangements, particularly in the light of the key role that local and regional governments are expected to play on the ground.

PART 3: Resources and the local and regional capacity gap

One of the clearest findings emerging from the questionnaire concerns the level at which LRGs are able to take on the new or expanded responsibilities that may result from the implementation of the Pact. Overall, this preparedness appears to be limited and highly uneven across countries. Austria is the only country to consider that LRGs are “mostly prepared”, while Germany and Malta regard them as only “partially

prepared”. By contrast, Slovakia, the Czech Republic and Belgium consider that LRGs are not prepared. This distribution highlights a contrasting European landscape, in which the capacity of local and regional levels to anticipate and adapt remains highly variable.

These differences in preparedness do not appear to be random. On the contrary, the responses suggest a correlation between the level of preparedness of LRGs, the actual availability of additional resources, and the degree of clarity of the governance framework within which they operate. In the questionnaire, countries where responsibilities appear to be clearer and where information channels are relatively better established also tend to be those where local authorities seem better equipped to anticipate the consequences of the Pact. Conversely, where responsibilities remain unclear, where national guidance is insufficiently specified, and where the involvement of LRGs in preparing for the implementation remains limited, the level of preparedness appears lower. This interpretation is consistent with the analysis already initiated in the draft report, which explicitly underscores the link between preparedness, available resources, and governance clarity.

The review of additional resources granted since 2024 confirms this finding. Austria, the Czech Republic, Belgium and Malta report having received no additional resources to cope with the new tasks related to migration and asylum, while Germany and Slovakia mention only partial support. Where support has been provided, it remains sporadic and limited in scope: additional budget and IT tools in Germany, manuals or operational guidance in Malta, and reimbursement of certain accommodation costs for specific groups of migrants in Slovakia. Overall, no country reports having received comprehensive, structured, and explicitly dedicated funding for the local implementation of the Pact.

Beyond the resources already allocated, the questionnaire above all highlights a more structural weakness: limited access to funding and limited capacity to scale up. All respondents indicate that local authorities have restricted access to the funding required and only limited ability to expand their means if needs were to increase. The Czech Republic stands out as a particularly concerning case, as the response points not only to a lack of clear visibility regarding available funding, but also to a genuine inability to increase existing capacities. Belgium also falls within this broader pattern of limited resources, with insufficient access to funding and a weak capacity to adapt in the event of additional pressure.

These results therefore reveal a systemic mismatch between, on the one hand, the expected expansion or consolidation of local and regional responsibilities in areas such as integration, housing, social support and

education, and, on the other hand, the means actually made available to fulfil them. In this perspective, the issue lies not only in the formal administrative preparedness of LRGs, but also in their concrete capacity to absorb additional responsibilities on a sustainable basis, without stable funding, without sufficient organisational margins, and without a clear strengthening of their human and material resources.

Taken together, these elements suggest that local preparedness should not be understood merely as a technical variable, but rather as the product of a broader institutional environment combining funding, multilevel coordination, and operational capacity. Key outcomes point less to a lack of willingness on the part of local authorities than to a genuine local capacity gap, that is, a persistent gap between the expectations placed on local and regional governments and the concrete means at their disposal to implement the Pact effectively and sustainably.

PART 4: Local and regional impacts and emerging challenges

Was the June 2026 deadline ever realistic?

One of the central findings of the research is that, for a majority of respondents, the June 2026 deadline appeared either difficult to meet or, at the very least, uncertain. Austria was the only country to consider this deadline realistic. Germany adopted a more nuanced position, considering it only partially realistic, while Slovakia, the Czech Republic and Malta clearly answered in the negative. Belgium, for its part, did not explicitly reject the timeline, but underlined that it had remained difficult to assess how realistic this deadline is in the absence of a clear view of the Pact's immediate impact at the local level. It also places particular emphasis on the lack of communication and information from the federal level to local authorities, making any definitive assessment especially difficult.

Taken together, these responses pointed more to a broader uncertainty than to a mere technical delay. The difficulties identified did not concern the timeline alone, but also the concrete capacity of local and regional authorities to prepare under satisfactory conditions. Several obstacles were repeatedly mentioned. Many respondents cited insufficient staffing as a major barrier to implementation within the proposed timeframe. The lack of clear national guidance also emerged as a central issue in Germany, Slovakia, the Czech

Republic and Malta. While Czechia reported delays in legislative transposition, Malta reported insufficient time to adapt administrative procedures as well as reception structures.

Taken together, these elements suggest that the question of whether the deadline was realistic could not have been dissociated from the overall state of preparedness of national and local governance systems. The issue therefore lied not only in formally complying with a European timetable, but also in the capacity of states to create, in advance, the political, administrative and operational conditions that would enable local and regional governments to effectively take on the Pact's new requirements.

** The results of the questionnaire were recorded before the Pact was implemented. Although the deadline has passed, it remains important to understand how local and regional governments prepared for its implementation.*

Where are pressures emerging at local and regional level?

The research shows that the pressures linked to the implementation of the Pact are concentrated in several key areas. First, integration appears to be one of the main points of tension, as it is mentioned in various forms across several countries, notably Austria, Belgium, Germany, the Czech Republic and Malta. Resource gaps also represent a major concern, whether in terms of human, financial or infrastructural resources. In addition, several respondents point to problems of legal clarity and division of responsibilities, particularly visible in Germany, the Czech Republic and Malta. Lastly, difficulties in coordination with national authorities are mentioned by Slovakia, the Czech Republic and Malta, confirming that tensions are not confined to frontline services alone, but are also rooted in the very architecture of multilevel governance.

Overall, these findings show that the difficulties surrounding the local implementation of the Pact cannot be reduced to a single sector or to one specific type of constraint. Rather, they reflect an accumulation of interconnected vulnerabilities: pressure on services, insufficient resources, lack of coordination, weak administrative tools, and uncertainty regarding responsibilities.

What support do LRGs need?

The responses collected from members make it possible to identify the main support priorities expressed by local and regional governments. The most recurrent demand concerns the provision of additional national funding. This priority is mentioned by Austria, Belgium, Germany, Slovakia, the Czech Republic and Malta, making it by far the most frequently cited need. Other needs also emerge in a significant way, although they vary more from country to country. Germany, Slovakia and the Czech Republic stress the need for clearer national guidance. Slovakia and the Czech Republic also call for direct access to EU funding, without having to rely exclusively on national intermediaries. Austria, Belgium and Germany highlight the need for more staff as well as support for recruitment. Malta, for its part, mainly stresses the need for stronger coordination mechanisms, as well as improved data sharing and more effective IT tools. The findings also highlight an important example drawn from the recent experience of the Ukrainian displacement crisis, particularly through the case of the Czech Republic. The Czech contribution underlines that municipalities demonstrated a strong capacity to respond to a large influx of displaced persons by rapidly mobilising solutions in areas such as accommodation, schooling and social support. This experience therefore points to a genuine capacity for action on the part of local authorities in emergency situations. However, the same response also stresses that these efforts often relied on improvisation, ad hoc mechanisms and the intensive mobilisation of local resources. In other words, while local capacity clearly exists, it remains fragile and difficult to sustain over the long term without a more stable and structured framework.

Thus, even if local and regional governments can demonstrate reactivity, innovation and flexibility in certain cases, these qualities alone are not sufficient to guarantee the sustainable implementation of the Pact. Without clearer division of roles, stable funding, investment in administrative capacities, and improved coordination mechanisms, the burden placed on local authorities is likely to remain fragile and precarious.

Conclusions

The findings reveal that the challenge facing the Pact is not primarily one of formal competence allocation. Across most participating countries, local and regional authorities already play a substantial role in migration and asylum governance, particularly in relation to integration, housing, education, health and social support. Rather, the central challenge lies in ensuring that these responsibilities are matched by adequate resources, clear governance arrangements and meaningful involvement in decision-making processes.

The report identified three interconnected implementation risks. First, there is a governance gap, whereby local and regional authorities are expected to implement policies they have had limited opportunity to shape. Second, there is a capacity gap, reflected in insufficient funding, staff shortages and limited ability to scale up services. Third, there is a coordination gap, characterised by fragmented information flows, unclear responsibilities and uneven communication between levels of government.

Taken together, these gaps risk undermining the effectiveness of the Pact's implementation. Without greater clarity, stronger coordination and enhanced support for local and regional actors, there is a danger that implementation challenges will emerge precisely at the level where migration and integration policies ultimately materialise: towns, cities, and regions.

At the same time, the research provides grounds for optimism. The experience accumulated by local and regional governments in responding to previous migration and displacement situations demonstrates significant operational expertise, adaptability and commitment. These capacities represent an important asset for the successful implementation of the Pact. However, they should not be taken for granted. Effective implementation requires moving beyond an approach in which local governments are viewed solely as delivery agents and towards one in which they are recognised as full partners in migration governance.

The implementation phase of the Pact therefore offers an opportunity to strengthen the European model of multi-level governance. By formally recognising the role of local and regional governments, improving coordination across levels of government, ensuring that funding instruments better reflect local realities, and systematically monitoring implementation at territorial level, European and national authorities can significantly enhance the effectiveness, coherence and sustainability of the new framework.

Ultimately, the success of the Pact will not be measured solely by the adoption of legislation or the fulfilment of national implementation milestones. It will depend on whether the new framework can be effectively translated into practical outcomes for communities, public services and individuals across Europe. In this respect, local and regional governments are not peripheral actors but essential partners whose involvement will be decisive for the long-term success of the European migration and asylum system.

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We empower cities, towns, and regions to build peaceful, inclusive, just, and resilient communities by amplifying their voices at European and international levels. Our aim is to ensure that local leaders are fully equipped to drive the sustainable transition of their territories to effectively respond to global challenges.

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