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REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL

on the application of Regulation (EU) 2019/1240 of 20 June 2019 on the creation of a European network of immigration liaison officers

1. Introduction

1.1 Policy context

The European network of immigration liaison officers (the 'ILO Network') is the community of liaison officers posted to third countries by Member States, Schengen associated countries, EU home affairs agencies ([1]) and the European Commission ('ILO Network Members') to work full-time or part-time on immigration tasks. The overall aim of the ILO Network is to ensure optimal cooperation and coordination between immigration liaison officers ('ILOs') in support of EU policy in the field of migration.

The ILO Network, which was set up in 2004 by Council Regulation (EC) No 377/2004 ([2]), was reinforced by Regulation (EU) 2019/1240 ([3]) on the creation of a European network of immigration liaison officers ('the ILO Network Regulation').

The ILO Network Regulation is aimed at modernising and strengthening the ILO Network to enable it to play a more effective role in EU migration management, including by fostering a Team Europe approach within the Network. It broadened the definition of the concept of 'immigration liaison officer', and introduced other innovative aspects, such as a new ILO Network Steering Board ([4]) and a stronger role for liaison officers deployed by the Commission and EU home affairs agencies. It strengthened the role played by ILOs in gathering and exchanging information, including by establishing a secure web-based information exchange platform, and broadened the ILO Network's scope to embrace the full spectrum of migration management tasks.

The ILO Network Regulation is an essential part of the EU's comprehensive approach to migration management under the Pact on Migration and Asylum ('the Pact') that entered into application on 12 June 2026 ([5]). The ILO Network plays a key role in embedding migration in international partnerships, which is a cornerstone of the Pact. Indeed, ILOs, who are on the ground and cooperating day-to-day with local authorities on the full spectrum of migration management tasks are central to cooperating with third countries on migration.

The Strategy on Asylum and Migration Management, provided for under the Pact and adopted in January 2026, recalls that the Commission relies on the support of the ILO Network as one of the partners engaged in countering migrant smuggling along the routes and helping the countries along the routes to be prepared ([6]). As such, the ILO Network

([1]) The European Union Agency for Law Enforcement Cooperation (Europol), the European Border and Coast Guard Agency (Frontex), the European Agency for Asylum (EUAA).
([2]) https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32004R0377
([3]) https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019R1240
([4]) The ILO Network Steering Board is composed of one representative of each Member State, two representatives of the Commission, one representative of the European Border and Coast Guard Agency, one representative of the European Union Agency for Law Enforcement Cooperation and one representative of the European Union Asylum Agency. Countries associated with the implementation, application and development of the Schengen *acquis* shall participate in the Steering Board and shall appoint one representative each as members without voting rights. They shall be allowed to express views on all issues discussed and decisions taken by the Steering Board.
([5]) https://home-affairs.ec.europa.eu/policies/migration-and-asylum/pact-migration-and-asylum_en
([6]) https://home-affairs.ec.europa.eu/european-asylum-and-migration-management-strategy_en

plays a key role in implementing the Global Alliance to Counter Migrant Smuggling ([7]) – in particular the 'whole-of-route' approach proposed in its Joint Declaration of December 2025 ([8]) – including by improving the collection and sharing of situational awareness data related to migrant smuggling and promoting joint law enforcement investigations and operational cooperation with partner countries.

The ILO Network also helps to implement the full range of EU migration management policy and legal instruments, including the renewed EU action plan against migrant smuggling (2021-2025) ([9]), the EU strategy on combatting trafficking in human beings (2021-2025) ([10]), the Return Directive ([11]), the EU Visa Code ([12]), the EU visa strategy ([13]), the EUROSUR Regulation ([14]) and the European Border and Coast Guard Regulation ([15]).

1.2 Objectives and methodology of this report ([16])

This report, based on information provided by Member States, Schengen associated countries ([17]) and the relevant EU home affairs agencies ([18]), takes stock of how the Regulation has been implemented to date, identifies and analyses the progress made and work still outstanding, and proposes measures to continue its implementation and thus increase the ILO Network's operational impact.

This report also feeds into the Commission's simplification and implementation agenda. By analysing Member States' implementation of the ILO Network Regulation, it is contributing to stress testing the Regulation to ensure it remains relevant, proportionate and appropriate to achieving its objectives in a cost-efficient way.

([7]) https://ec.europa.eu/commission/presscorner/detail/mt/ip_23_6081. The Global Alliance's three pillars are (i) prevention of migrant smuggling, (ii) a response to migrant smuggling and (iii) alternatives to migrant smuggling.
([8]) https://home-affairs.ec.europa.eu/news/global-alliance-counter-migrant-smuggling-reinforces-its-commitments-its-second-conference-2025-12-11_en
([9]) https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52021DC0591
([10]) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0171
([11]) https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0115. It will also be instrumental in implementing the future Return Regulation, foreseen to be adopted in the last quarter of 2026. The text includes the creation of 'Union return liaison officers', which would become part of the ILO Network.
([12]) https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019R1155
([13]) https://home-affairs.ec.europa.eu/eu-visa-strategy_en
([14]) https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32013R1052
([15]) https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019R1896
([16]) In line with Article 12 of the ILO Network Regulation, the Commission is required to report to the European Parliament and the Council on its application five years after the adoption of the Regulation. The ILO Network Regulation was adopted on 20 June 2019. The preparation and adoption of the implementation report was planned to closely align with the publication of the Strategy on Asylum and Migration Management published in January 2026.
([17]) For the purpose of this report, the term 'Member States' is understood to mean both EU Member States and Schengen associated countries.
([18]) A questionnaire was circulated to ILO Network Members on 28 July 2025.

2. Deployment, roles and tasks of ILOs

2.1 Strategic and operational considerations for ILO deployment

An ILO is a liaison officer designated and deployed abroad by the competent authorities of a Member State, by the Commission or by an EU agency, to deal with immigration-related issues, even if such issues only form part of their duties.

In line with the ILO Network Regulation, ILOs are called on to better coordinate and optimise the use of their network in order to respond more effectively to the EU's priorities, ranging from preventing and combating illegal migration and related cross-border criminality, facilitating dignified and effective returns, readmission and reintegration activities, contributing to the integrated management of the EU's external borders, to supporting the management of legal immigration, including in the area of international protection, resettlement and pre-departure integration measures.

Where Member States decide to deploy ILOs to third countries, their decisions are largely based on assessments of strategic national factors and operational priorities. These assessments typically look at factors such as (i) illegal migration affecting their countries, including both current and expected migratory movements; (ii) migrant smuggling and trafficking in human beings in countries of origin or transit; (iii) identity and document fraud; (iv) risks identified at local airports; (v) the need to support investigations into migrant smuggling and trafficking in human beings; (vi) cooperation on returns; (vii) and cooperation in border management.

Hungary, the Netherlands and Portugal have indicated that legal migration-related tasks are also a factor in deployment decisions (e.g. supporting labour mobility legal fast-track mechanisms and addressing fraud in non-asylum related migration procedures).

In Belgium, priority third countries are ranked based on a strategic analysis of a set of criteria covering the presence of diaspora communities, trade relations, levels of criminal activity and the effectiveness of existing official cooperation channels. Belgium considers deploying liaison officers, including ILOs, where it assesses that close cooperation in third countries is necessary to complement formal mechanisms. Similarly, in Germany, ILO deployment decisions are based on strategic and tactical assessments, taking into account migration trends in third countries, operational tasks and national strategic interests.

Bilateral agreements that facilitate collaboration and cooperation between ILO Network Members with deployed ILOs and host countries are another key factor in deployment decisions. Where such agreements are in place, they provide an important foundation for effective ILO deployment. Security conditions and available resources also influence deployment decisions.

Finally, Latvia, Slovenia and Sweden have highlighted the importance of taking broader EU interests and priorities into account when deploying ILOs. In this context, eight countries ([19]) have currently deployed European return liaison officers (EURLOs) ([20]) with

([19]) Belgium, Estonia, Finland, France, the Netherlands, Norway, Poland and Sweden.

([20]) An EURLO is a specialised liaison officer from a Member State, paid by the EU and deployed to a third country in view of representing European Union return interests by verifying the identity of illegaly staying

support from Frontex in order to operate in third countries on behalf of the EU, thereby taking a Team Europe approach in the area of returns.

European migration liaison officers (EMLOs) lie at the heart of ILO networks. They are specific ILOs which the Commission (DG HOME) ([21]) has been deploying since 2015 to coordinate and represent EU interests in the field of migration. The aim of deploying EMLOs is to maximise the impact of EU action on migration management in partner countries and better engage key countries of origin and transit. Their tasks include gathering information on migration trends, contributing to the EU's situational awareness and forecasting, supporting the implementation of EU policy priorities, and facilitating and supporting local and regional ILO networks. EMLOs are currently deployed to seventeen priority third countries ([22]) identified by the Commission.

As for deployments by EU agencies, Frontex currently has Frontex liaison officers (FLOs) deployed to seven countries covering a total of fourteen partner countries ([23]). Frontex gives priority to the deployment of liaison officers to those partner countries which, on the basis of a risk analysis, constitute countries of origin or transit for illegal migration. Countries of relevance in the area of returns are also considered ([24]). Europol, for its part, primarily relies on convening Member States' and international partners' liaison officers to its headquarters and currently only deploys liaison officers to Interpol and to Washington. The European Agency for Asylum has not yet deployed any ILOs.

2.2 Joint deployment

In view of the overall objective of ensuring cooperation and coordination, the ILO Network Regulation underlines the importance of joint deployment. Specifically, it states that joint deployment should be promoted to enhance operational cooperation and information sharing between Member States and to respond to needs at EU level, as defined by the Steering Board. In line with Article 6 of the ILO Network Regulation, ILO Network Members may agree, on a bilateral or multilateral basis, that ILOs deployed by one Member State to a third country or international organisation may also represent their interests. In such cases, the Member States concerned may receive EU financial support.

ILO Network Members have not yet used this opportunity and point to several obstacles to doing so. According to some Members States, ILOs are best deployed in line with national migration priorities, focusing on regions of strategic importance to them. Other Member States have highlighted the sensitivity of joint deployment, as well as legal

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third-country nationals, capacity building in the field of returns, supporting the organisation of joint return operations under the coordination of Frontex and facilitating the implementation of reintegration and post-arrival assistance.

([21]) European migration liaison officers are currently the only liaison officers deployed by the Commission.

([22]) The 17 priority third countries for EMLO deployment are: Armenia, Bangladesh, Ethiopia, Egypt, the Gambia, Lebanon, Mali, Mauritania, Morocco, Niger, Nigeria, Pakistan, Senegal, Serbia, Sudan, Tunisia and Türkiye. New countries of deployment were selected based on needs identified by the Working Party on External Aspects of Asylum and Migration.

([23]) Albania (covering also North Macedonia and Kosovo*), Moldova (covering also Ukraine, Georgia, Armenia and Azerbaijan), Morocco, Pakistan, Senegal (covering also the Gambia and Mauritania), Serbia (covering also Bosnia-Herzegovina and Montenegro) and Türkiye.

([24]) Article 77(4) of Regulation (EU) 2019/1896 on the European and Coast Guard also lays down the basis for the deployment of Frontex Return Liaison Officers although none have yet been deployed. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019R1896.

difficulties or procedural prerequisites. Limited capacity and resource constraints are also seen as factors hindering joint deployment.

2.3 Scope of ILO mandate

Article 2 of the ILO Network Regulation provides that liaison officers are to be considered ILOs even if immigration-related issues constitute 'only a part of their duties'. The ILO Network is therefore composed of both liaison officers deployed with an exclusive focus on immigration and liaison officers dealing with immigration as part of a broader portfolio of tasks.

There is an even balance between Member States that choose to deploy ILOs with exclusively immigration-related tasks and Member States that deploy ILOs with immigration tasks forming part of a broader range of responsibilities. Those Member States facing higher migratory movements tended to prioritise the deployment of ILOs with exclusively immigration-related tasks with the aim of supporting migration cooperation with key partner countries, in particular to reduce illegal migration and facilitate returns. By contrast, those Member States that integrated immigration tasks into broader mandates pointed to the operational flexibility this provides, as well as to resource constraints, including budgetary considerations. Finally, some ILO Network Members reported using a mix of both exclusive and broader mandates depending on the strategic needs and operational context of each deployment.

2.4 Tasks and responsibilities

ILOs carry out their tasks within the framework of the responsibilities defined by the deploying authorities. The ILO Network Regulation is specifically without prejudice to the responsibility of deploying authorities for defining the scope and the assignment of tasks and reporting lines of their respective ILOs.

Article 3 of the ILO Network Regulation outlines a wide array of tasks, including a full set of migration-related tasks. However, according to almost all ILO Network Members, the responsibilities of ILOs are, at their heart, about gathering, exchanging and analysing information about migration trends, particularly on illegal migration and migrant smuggling, in order to inform strategic decision-making processes at their headquarters. Facilitating return operations by assisting with the necessary logistical and legal processes to support repatriations also forms part of the tasks of ILOs according to most ILO Network Members.

Around half of all ILO Network Members stated that the tasks of ILOs included supporting investigations into migrant smuggling or trafficking in human beings and supporting legal migration tasks, including legal migration procedures, information-gathering on legal migration pathways and visa application process.

Training, both as capacity building for host authorities and for consular staff, is also a task frequently performed by ILOs. While the former largely focuses on border management tasks, including document fraud, Schengen rules and passenger assessments, the latter provides support for visa processing with a view to preventing visa fraud through local

Schengen cooperation (LSC) ([25]). Airport liaison officer tasks, such as assistance in document verification and passenger assessments, were cited by a small number of ILO Network Members.

Currently, no ILO Network Members have reported that their ILOs are involved in protection/resettlement-related activities.

Finally, Member States reported that ILOs often play a significant role in fostering cooperation with host country authorities, thereby improving bilateral relations with a view to managing migration challenges collaboratively.

Most ILO Network Members stated that they invest significantly in establishing robust training frameworks for their ILOs, providing initial and/or ongoing training tailored to equip ILOs with the skills and knowledge needed to perform their tasks effectively. However, around one third of ILO Network Members indicated having no standardised initial or ongoing training for ILOs.

2.5 Access to EU large-scale information systems

To enable ILOs to perform their tasks, ILO Network Members (at the exception of Commission ILOs) may grant ILOs access to EU large-scale home affairs information systems, including the European Asylum Dactyloscopy (Eurodac) database, the Schengen Information System (SIS), the Visa Information System (VIS), the Entry/Exit System (EES), and the False and Authentic Documents Online (FADO) system, under the specific Union legal instruments governing those systems ([26]).

ILO Network Members reported varying levels of access to and use of these information systems. Approximately half of Member State ILOs, as well as Europol Liaison Officers, are able to directly access and run queries on at least one EU large-scale home affairs information system. The most frequently cited systems were the SIS and VIS, although Eurodac and FADO were also mentioned. Several Member States ([27]) reported that their ILOs were unable to directly run queries on EU large-scale home affairs information systems, although they could request information centrally via the authorised authority.

The varying levels of access to EU large-scale home affairs information systems reflects the broad range of ILO profiles, from law enforcement officers who are most likely to have access because of their law enforcement tasks, to staff from migration or foreign affairs ministries who are less likely to have access as their tasks do not involve law enforcement. Technical and security considerations were also mentioned as a reason for restricting ILOs access. Beyond these considerations, however, ILO Network Members' operational access to EU large-scale information systems was revealed to be fragmented.

([25]) Local Schengen cooperation is governed by the Visa Code; it refers to the structured cooperation between the EU delegation and Member State consulates in each third country as regards Schengen visa matters.
([26]) These information systems are managed by the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA), at the exception of FADO, that is managed by the European Border and Coast Guard Agency (Frontex), with technical support of eu-LISA.
([27]) Belgium, Hungary, Poland, Romania.

3. Functioning of ILO networks

3.1 Participation in local and regional ILO networks

Article 5 of the ILO Network Regulation requires ILOs deployed to the same countries or regions to form networks at local or regional level. Furthermore, it requires such local and regional networks to meet regularly and whenever necessary and to serve as fora for cooperation, coordination and for sharing information. In addition to Regulation requirements, continuous coordination and information sharing between ILOs and EU delegations and CSDP missions on the ground (particularly when these missions have an immigration mandate) are critical to effective EU migration management.

In terms of their participation in local ILO networks, ILO Network Members have demonstrated varying levels of engagement. The vast majority reported that they actively participate, indicating that they regularly attend meetings and exchange information. A small number of ILO Network Members had had either limited or no engagement with local ILO networks, often due to constraints related to workload, to the broad responsibilities of the ILOs or, in one case, to the lack of available networks for their officers to engage with in host countries.

Europol Liaison Officers based in Washington participated actively in local ILO coordination meetings, including on migrant smuggling and trafficking in human beings. Frontex Liaison Officers also actively participated in local networks wherever they were deployed.

Approximately half of ILO Network Members stated that they actively engage in regional ILO networks focusing on information exchange, coordination and participation in regional fora such as the Khartoum and Rabat Processes and in regional conferences such as the Africa Frontex Intelligence Community (AFIC) ILO conference. Others participated on an occasional basis due to a lack of regional network structures in some areas, workload, budget limitations or limited interest.

ILO Network Members did not report facing major difficulties in obtaining or exchanging information between ILOs. However, some ILO Network Members stressed the need for greater clarity at EU level on exchanging personal data between ILOs or had faced legal difficulties related to the protection of personal data. In this regard, Article 10 contains provisions that allow ILOs to process personal data, for certain specific tasks([28]).

As a result, but also due to the absence of a user-friendly information exchange tool for ILOs, ILOs often turned to less formal communication mechanisms, such as mobile messaging applications, due to their availability in their posting locations.

([28]) The ILO Network Regulation allows personal data to be processed for the following tasks: (a) establishing the identity and nationality of third-country nationals and facilitating their return in accordance with Directive 2008/115/EC, as well as assisting their reintegration, where relevant and possible; (b) confirming the identity of persons in need of international protection for the purposes of facilitating their resettlement in the Union, including by providing them, where possible, with adequate pre-departure information and support; (c) confirming identity and facilitating implementation of Union and national measures in respect of the admission of legal immigrants; (d) sharing information obtained in the course of their duties within networks of immigration liaison officers and with competent authorities of the Member States, including law enforcement authorities, in order to prevent and detect illegal migration as well as combat smuggling of migrants and trafficking in human beings.

3.2 Facilitator role in local networks

The role of the network facilitator is crucial both to setting up local and regional networks and to those networks functioning effectively. The network facilitator acts as the day-to-day driving force behind ILO cooperation and coordination, both at local and regional level, playing a key role in maximising the operational impact of ILOs.

As set out in the ILO Network Regulation, the ILOs deployed by the Commission (i.e. EMLOs), with their inherent European mandate, are automatically assigned responsibility for facilitating and supporting the networks. EMLOs were frequently identified by ILO Network Members as being instrumental in fostering stronger coordination and a more proactive, cohesive network dynamic. In many EU delegations, EMLOs have become key resources in the field of migration, acting as an important bridge between EU delegations, Member States and local authorities. The impact of EMLOs was, however, limited by growing difficulties in filling vacancies for EMLOs. This issue stems from the fact that seconding Member States bear the financial burden for deploying EMLOs. As a result, several priority partner countries currently do not have an EMLO deployed to them ([29]), with the majority of EMLO positions being filled by Germany.

In countries where the Commission does not deploy ILOs, ILOs deployed by EU home affairs agencies must facilitate and support local and regional networks. Frontex Liaison Officers have taken and/or continue to take a leading role in Morocco, Senegal, Moldova and Türkiye. Europol Liaison Officers based in Washington have taken leading roles in fora such as the Liaison Officer Association and the International Law Enforcement Association. The positive contribution of liaison officers from EU home affairs agencies in facilitating local and regional networks was also widely recognised amongst ILO Network Members, despite them being few in number.

In countries where neither the Commission nor EU agencies deploy ILOs, local and regional networks are to be facilitated by a Member State ILO agreed by the members of the local or regional network. Some Member States have stepped in to take a leading role in facilitating local ILO networks, including Hungary, Italy, the Netherlands, Norway, Spain and Switzerland. However, they remain few in number. ILO Network Members that stated they had not taken on a leading role in local or regional networks mostly pointed to workload as the reason for this, explaining that taking a leading role could potentially disrupt the ILO's other duties given their broader operational responsibilities or overall workload.

3.3 Contribution of ILOs to building a European situational picture

For the purposes of responding more effectively to the EU's priorities, the ILO Network Regulation stresses 'the need for immigration liaison officers to ensure that their insight and knowledge contribute fully to the establishment of a comprehensive situational picture on third countries' ([30]).

([29]) Armenia, Bangladesh, Egypt, Ethiopia, the Gambia, and Türkiye. EMLO deployments to Niger and Sudan are currently on hold. The FLO deployed to Türkiye is performing local ILO network facilitation.
([30]) Recital (7) of the ILO Network Regulation.

EMLOs make contributions in different fora, including in the Council's operational coordination mechanism for the external dimension of migration (MOCADEM) and for the Migration Preparedness and Crisis Blueprint. EMLOs are also expected to produce monthly and ad hoc reports that contribute, *inter alia*, to Integrated Situational Awareness and Analysis (ISAA) reports and Migration Preparedness and Crisis Blueprint meetings and are published on the integrated political crisis response (IPCR) website.

Alongside Member State ILOs reporting to their competent national authorities, Article 9 of the ILO Network Regulation calls for EU-wide information sharing through a secure web-based information exchange platform. For this purpose, the Commission has leveraged the existing European Migration Network-Information Exchange System (EMN-IES) platform to serve as the ILO Network's information sharing tool, including for administrative purposes related to the ILO Network ([31]).

To date, very few ILO Network Members have registered with the EMN-IES platform, with even fewer using it for information sharing purposes. All ILO Network Members confirmed that they made very limited use, if any, of the platform. The challenges and obstacles cited for the low level of use of the EMN-IES platform included poor user experience, a lack of standardisation in information sharing, prior authorisation needed from central authorities prior to uploading information, and a lack of awareness and relevant information on the platform. Finally, despite the provisions of the ILO Network Regulation, some ILO Network Members also pointed to legal impediments which prevented them from using the EMN-IES platform effectively.

Only a small number of ILOs posted by ILO Network Members are connected to Europol's Secure Information Exchange Network Application (SIENA), despite the fact that the ILO Network's biennial work programme calls for a pilot project to be set up to connect ILOs deployed in third countries by law enforcement authorities. Europol would welcome enhanced ILOs' connectivity to SIENA, underlining that ILOs' active reporting to Europol would enhance information flow on migrant smuggling and related crimes, which would in turn contribute to a more accurate real-time intelligence picture and support a more data-driven and upstream approach to disrupting criminal networks. The Europol Regulation, as lastly amended by Regulation (EU) 2025/2611 ([32]), requires Member States to connect their ILOs to SIENA to submit relevant information to Europol directly or through national authorities. ([33])

([31]) Article 9 states that information shared through the information exchange platform must include, *inter alia*, the ILO Network's biennial work programmes, an up-to-date list of Steering Board members, an up-to-date list of contact details of immigration liaison officers deployed to third countries, and relevant documents related to the activities and decisions of the Steering Board. Article 9 also states that, with the exception of information on deployed ILOs and members of the ILO Network Steering Board, the information exchanged through the secure web-based information exchange platform must not contain personal data or any links through which such personal data is directly or indirectly available.

([32]) Regulation (EU) 2025/2611 on the strengthening of Europol's support and enhancing police cooperation, for preventing and combating migrant smuggling and trafficking in human beings. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32025R2611.

([33]) The Europol Regulation provides also that, where it is not possible to connect an immigration liaison officer to SIENA due to legal, organisational or technical reasons, that immigration liaison officer shall submit the relevant information to a national competent authority through other secure channels.

Specifically in the case of EURLOs, Frontex emphasised that while the Integrated Return Management Application (IRMA) allowed return-related information to be shared, EURLOs did not have access to systems allowing for other types of operational information to be exchanged, including information for building situational awareness. For example, neither EURLOs nor FLOs have access to the European Border Surveillance (EUROSUR) system.

ILO Network Members have repeatedly called for structured communication frameworks and the corresponding tools to be put in place for making secure data exchanges more effective, as a way of improving the implementation of the ILO Network Regulation.

3.4 Contribution of the ILO Network to migration management

ILO Network Members widely recognised the ILO Network's positive contribution to migration management. In particular, they emphasised the ILO Network's important role in collecting and sharing vital operational and strategic information, including on trends over different migration routes, migrant smugglers' operating methods and emerging threats. In addition, they highlighted that the ILOs' provision of timely, reliable and actionable information from the field was critical to situational awareness, risk analysis and informed decision-making.

From an operational perspective, the role played by ILOs in the area of returns is also highly valued. ILOs, and in particular EURLOs, promote dialogue and cooperation, including through capacity building programmes and by supporting efforts to identify returnees. They also facilitate return operations and assist with monitoring the European Reintegration Programme's (EURP) local reintegration partners.

ILOs are also central to efforts by ILO Network Members to counter migrant smuggling. Contributions by ILOs range from identifying smuggling routes and emerging trends to detecting fraudulent documents and suspicious travel patterns. Other contributions include advising airlines at airports and cooperating on-site with investigations and operations to dismantle organised crime groups involved in migrant smuggling and trafficking in human beings. Furthermore, ILOs are recognised for their valuable contribution to supporting local Schengen cooperation and consular authorities in processing visa applications, in particular in assisting with the detection of fraudulent documents.

Overall, ILO Network Members viewed ILOs as a 'crucial bridge with partner countries' authorities' that help to build critical day-to-day cooperation with counterparts in host countries as well as trust-based relationships that underpin effective cooperation and enable rapid, pragmatic problem-solving. Nevertheless, cooperation and coordination within ILO networks is sometimes inconsistent and heavily dependent on the personal commitment and leadership of network facilitators.

4. Implementation of the Steering Board's mandate

4.1 Establishment and functioning of the Steering Board

Article 7 of the ILO Network Regulation establishes the ILO Network Steering Board which is chaired by the Commission. Between June 2019, when the ILO Network Regulation was adopted, and December 2025, twelve meetings of the Steering Board,

either in person or online, were convened. On 4 October 2019, the Steering Board adopted its rules of procedure as required by Article 8 of the ILO Network Regulation.

In addition to executing its administrative tasks as the ILO Network's governing body, the Steering Board, which embodies the Team Europe approach to the community of deployed ILOs, is expected to provide the strategic steer for implementing the ILO Network Regulation and thus a Team Europe approach on the ground.

Activities falling under the Steering Board's responsibility, such as identifying deployment gaps, assessing the potential for additional ILO deployments and agreeing on ad hoc actions by local and regional ILO networks, all require the Steering Board to provide strategic impetus. However, the Steering Board has so far relied almost entirely on the Commission's steer, while other ILO Network Members have not yet really made use of the Steering Board's full potential, for example to identify priority third countries for joint deployment or to propose timely ILO projects or operational meetings.

Article 7 of the ILO Network Regulation also calls on the Chair of the Steering Board to ensure that agreed collective activities are consistent and coordinated with relevant EU instruments and structures and that they reflect the EU's priorities in the area of migration. While the activities included in the biennial work programme are aligned with the EU's priorities, there has so far been limited coordination with relevant Council working groups.

4.2 Implementation of the biennial work programme

Article 8 of the ILO Network Regulation tasks the Steering Board with establishing priorities and with planning activities in a biennial work programme. The biennial work programme for the European network of immigration liaison officers 2021-2022 was adopted on 7 December 2020 and established three priorities: (i) preventing illegal migration and countering smuggling; (ii) supporting the EU return policy and; (iii) supporting the promotion of legal pathways to the EU. Under each of the three priorities, a series of activities ([34]) were identified, to be implemented with financial support from the Internal Security Fund - Borders and Visa (2014-2020) ([35]).

On this basis, ILO Network Members can propose to take the lead in implementing a project. Since the adoption of the ILO Network Regulation, a total of 10 projects have been awarded support amounting to approximately EUR 8.5 million to address the three priorities set out in the biennial work programme. Only four Member States – France,

([34]) For priority 1: capacity building for authorities and other stakeholders in third countries; assisting consular authorities on document fraud related to visa applications; cooperating with Common Operational Partnerships and other projects aiming at preventing and fighting migrant smuggling and trafficking in human beings; common Airport Liaison Officers; setting up a pilot project on SIENA connection in third countries; supporting communication on ETIAS in third countries. For priority 2: capacity building for authorities and other stakeholders in third countries; supporting ILO return and readmission-related tasks in third countries. For priority 3: capacity building for authorities and other stakeholders in third countries; supporting legal pathways to the EU.

([35]) The biennial work programme was amended on 30 July 2021 to allow 1) funding of ILO projects by the Border Management and Visa Instrument (BMVI); 2) widening the eligibility criteria for direct awards beneficiaries; 3) all Member States to have the possibility to apply for direct awards for carrying out projects across the work programme's three priorities; 4) clarifying that funding is also available for the implementation of horizontal activities.

Germany, Poland and Spain ([36]) – have taken the lead in implementing a project. ILO Network Members cited several reasons for not taking advantage of the available funds, including insufficient human resources, especially in project management, low funding ceilings, access to other EU funding streams, and operational work taking priority over projects.

The biennial work programme, as adopted and subsequently amended, continues to be considered valid. The Steering Board has therefore carried over the biennial work programme to subsequent years. Thus the work programme for the European network of immigration liaison officers 2021-2022 was in force at the time of adopting this report.

4.3 ILO Network capacity building

Article 8 states that the Steering Board must support and build up the operational capabilities of ILOs, including by developing supplementary and non-compulsory common core curricula, pre-deployment training and guidelines on observing fundamental rights in their activities with a particular focus on vulnerable persons.

Although most ILO Network Members supported the idea of developing and offering a common ILO training curriculum for EU matters, this has not yet been followed up in practice. Several Member States highlighted that a common curriculum would ensure a unified knowledge base, enhance understanding of EU priorities, help align objectives, reinforce established procedures for communication and for exchanging information, views and best practices, and thus make ILOs more effective through the Team Europe approach as envisaged by the ILO Network Regulation. The majority of ILO Network Members believed that a common curriculum would achieve greater consistency in the way EU law and policies are applied, by ensuring rules are interpreted and applied in a more uniform manner, by preventing diverging approaches and by reinforcing cooperation between ILO Network Members.

Article 8 also calls for the capabilities of the ILO Network to be built up through the organisation of joint seminars covering the full spectrum of migration management tasks. Since the adoption of the ILO Network Regulation, one regional ILO event has been held under the umbrella of the ILO Network, namely a regional meeting of the European Network of Immigration Liaison Officers on countering migrant smuggling and the implementation of the Anti-Smuggling Operational Partnership with the Western Balkans, which took place in Tirana, Albania, on 28-29 March 2023. Another highly valued regional ILO event – although not formally organised under the umbrella of the ILO Network – is the Africa Frontex Intelligence Community (AFIC) annual ILO meeting.

ILO Network Members stressed the importance of ILO meetings. The ILO Network is first and foremost a community of practitioners. There is strong interest in in-person gatherings being held, not only at local level, but also at regional level, to allow the broader community, including liaison officers from like-minded countries, to meet.

5. Conclusions and next steps

([36]) The Netherlands, Norway and Poland have also supported the implementation of projects as secondary partners.

5.1 Conclusions

Progress has been made towards achieving the objectives of enhancing cooperation and coordination between ILOs and ensuring that ILOs better contribute to the functioning of the European network of liaison officers.

Local ILO networks are generally active, participation in them is well established, and they are recognised for their added value, in particular in terms of information sharing. Member States continue to deploy ILOs to work primarily on illegal migration and returns-related tasks, although they are also increasingly being asked to handle legal migration tasks. In several jurisdictions, ILOs have been closely involved in local Schengen cooperation and have assisted consulates with advice on risk profiles and with the detection of fraudulent visa applications. The role of ILOs from the Commission and from EU home affairs agencies, as well as EURLOs seconded by Member States, in fostering a positive dynamic in local and regional networks is widely recognised by ILO Network Members. As a result, there is broad support among ILO Network Members for deploying additional such ILOs to strengthen cooperation dynamics in host countries and the Team Europe approach within the ILO Network. The ILO Network Steering Board has been recognised for its added value as a governing body, namely through its biennial work programme and its priority-led actions.

Nevertheless, realising the full potential of the ILO Network, including enabling it to contribute comprehensively to a 'whole-of-route' approach, still poses several challenges.

While the deployment of ILOs by Europol, Frontex and the Commission, as well as EURLOs by Member States, has been helping to foster a Team Europe approach within the ILO Network, Member States still largely decide and assess whether to deploy ILOs on the basis of national strategic and operational interests, i.e. not with a Team Europe approach in mind. Furthermore, inconsistencies in terms of ILO Network Members' access to EU large-scale information systems reveal further fragmentation.

At an operational level, interactions between ILOs have been largely limited to in-person meetings and exchanges by messaging applications in the absence of user-friendly mechanisms or tools for exchanging information within local, regional, and broader ILO communities. Coordination between local ILO networks and local Schengen cooperation often resulted from individual ILOs taking initiative rather than from a culture of structured engagement between the local ILO network facilitator and the correspondent for local Schengen cooperation in the EU delegation.

In cases where no ILOs are deployed by the Commission or EU home affairs agencies, local and regional network activities have often seemed to be dependent on the individual leadership of Member State ILOs. As a result, almost all ILO Network Members consider that increasing the number of EMLOs and FLOs deployed to third countries would bring considerable benefits due to the leading role they play in facilitating local and regional ILO networks. ILO Network Members have also highlighted that the deployment of ILOs by

the Commission and EU home affairs agencies can improve operational effectiveness and cooperation through enhanced coordination ([37]).

Beyond day-to-day exchanges between ILOs at local level, information has largely been exchanged via national channels in the absence of an appropriate structured set-up for doing so. Technical and design issues with the EMN-IES information sharing platform, but also limitations posed by Member States authorities, have prevented information from being exchanged more broadly. In addition, the very limited number of ILOs connected to SIENA has hampered exchanges with Europol, while the lack of an appropriate channel and legal framework for sharing situational awareness information with Frontex has hindered the capacity of ILOs to share data with Frontex and thereby help the EU to build a pre-frontier situational picture. With regional ILO events only rarely taking place, broader information flows have been prevented, limiting the ILO Network's ability to help build a comprehensive situational picture on third countries.

At an institutional level, limited and, in some cases, no progress has been made on some of the Steering Board's tasks – as outlined in the ILO Network Regulation – that contribute to fostering a Team Europe approach. They include organising regional ILO events and developing a common core curriculum for ILOs. A lack of engagement by ILO Network Members and insufficient linkages with other EU fora have prevented the Steering Board from maximising its potential as a strategic entity, thereby failing to bring a real Team Europe approach to the ILO Network and to effectively roll out a 'whole-of-route' approach to EU migration management.

Where a Team Europe approach has been seen within the ILO Network, it has been largely driven by ILOs deployed by the Commission and EU home affairs agencies within local ILO networks, or by the Commission itself in its capacity as Chair of the ILO Network Steering Board. A stronger Team Europe approach and engagement by the Steering Board is central to seizing the full potential of the ILO Network Regulation on the ground and to empowering the ILO Network to become a key tool for implementing the Global Alliance to Counter Migrant Smuggling.

5.2 Next steps

The migration policy landscape has evolved considerably since the adoption of the ILO Network Regulation in 2019. Migration is a political priority for the EU linked, amongst other areas, to both internal security and economic competitiveness. There are strong signals calling for ILOs to play a stronger role in support of EU migration management, for migration diplomacy to be more coordinated and assertive, and for the full potential of the Team Europe approach to be realised on the ground in order to implement the Pact on Migration and Asylum and its comprehensive approach to migration management in partnership with third countries. Key initiatives in this regard include the Global Alliance to Counter Migrant Smuggling with a stronger role for Europol; the EU Talent Pool and

([37]) This is further reinforced by Europol that considers EMLO reports as a valuable source of information for Europol's European Centre Against Migrant Smuggling (ECAMS) that both informs its strategic assessments and helps identify intelligence gaps and improve its situational awareness, leading to a more comprehensive understanding of migrant smuggling and others forms of serious organised crime that that facilitate or are connected to it.

Legal Gateway Offices for fostering talent mobility and stepping up returns and readmission; the Asylum and Migration Management Strategy; and the EU Visa Strategy.

In the light of the above, the following steps are necessary to advance the implementation of the ILO Network Regulation in this evolving policy landscape, with the objective of increasing the operational impact both of the ILO Network – in support of EU migration management – and of the Global Alliance to Counter Migrant Smuggling:

'Whole-of-route' approach

1. broaden the coverage of ILOs deployed by the Commission and EU home affairs agencies to key countries along migration routes, including by using the ILO Network Steering Board to identify deployment gaps, by encouraging and financially supporting joint deployment, and by increasing funding for EMLO deployments;
2. improve ILO engagement across the full spectrum of migration tasks as outlined in the ILO Network Regulation, including combating migrant smuggling and trafficking in human beings, supporting return, readmission and reintegration, and facilitating legal migration procedures (e.g. through local Schengen cooperation) and effective access to international protection;
3. facilitate operational ILO meetings focused on priority migration routes and third countries to boost information sharing, to improve understanding of migratory dynamics and the operating methods of smuggling networks, and to develop tailored counter measures;

Information sharing and knowledge building

4. encourage and support Member States to connect ILOs to SIENA to enhance information sharing and thereby support the implementation of Regulation (EU) 2025/2611;
5. promote continuous coordination and information sharing between liaison officers, EU delegations and CSDP missions on the ground (particularly when these missions have an immigration mandate);
6. work towards providing the ILO community with user-friendly information sharing tools to improve operational cooperation and data exchange;
7. encourage ILOs to contribute to early warning activity for migratory purposes as part of the Situational Awareness, Early Warning and Forecasting (SAEWF) project ([38]) to support EU and Member States' migration management planning and operational actions;
8. develop a common core curriculum for ILOs in cooperation with the ILO Network Steering Board, in order to standardise knowledge of the ILO Network Regulation, key

([38]) The Situational Awareness, Early Warning and Forecasting (SAEWF) project carried out by the European Commission is a recent initiative that complements the EU mechanism for preparedness and management of crises related to migration ('Migration Preparedness and Crisis Blueprint'). Under this project, the development of early warning activity for migration purposes has already benefited from the input of EMLOs in a pilot horizon scanning exercise.

EU migration management policy areas and EU migration diplomacy across the ILO Network community;

ILO Network Steering Board

9. improve coordination between the Chair of the Steering Board and the Presidency of the Council to align ILO Network initiatives with relevant Council working groups (e.g. the Working Party on External Aspects of Asylum and Migration (EMWP,) the operational coordination mechanism for the external dimension of migration (MOCADEM), etc.);
10. encourage, without prejudice to the Regulation's provisions, Member States holding the Presidency of the Council to play an active role in the ILO Network Steering Board, in close coordination and under the chairmanship of the Commission;
11. draft a new ILO Network biennial work programme incorporating the above next steps to guide future operational priorities.