



Klikaktiv – Center for the Development of Social Policies

First Quarterly Report for 2025

(January – February – March 2025)

klikAktiv

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ABOUT KLIKAKTIV

Klikaktiv - Center for Development of Social Policies is a grassroots non-profit civil society organization which provides free legal counseling and psychosocial services to people on the move, asylum seekers and refugees in Serbia. The team is present on the external EU borders, namely covering border areas between Serbia and Croatia/Hungary/Romania, but also Bosnia and Herzegovina.

For more information and regular updates on our work, you can visit [Klikaktiv's webpage](#), [Facebook page](#) i [Instagram page](#).

For any additional information, comments or suggestions, feel free to contact us: [***info@klikaktiv.org***](mailto:info@klikaktiv.org)

EDITORIAL NOTE: IMPORTANT TERMINOLOGY, ACRONYMS AND RELEVANT ACTORS

People on the move – an umbrella term for refugees, migrants and asylum seekers

Refugees – people fleeing persecution, war, discrimination or any other factor that threatens their safety and well being.

Migrants – people who migrate, or move from one location to another.

Asylum seekers – people who have applied for asylum and international protection in a country.

Squat – an informal settlement in a field, forest or abandoned building.

Push back – illegal practice of a collective expulsion of people on the move by the border police authorities, regardless of the persons' asylum claims. Push backs commonly involve acts of violence, humiliation and/or other inhumane and degrading treatment.

Game – a slang term used by people on the move to refer to an attempt to cross a border.

Smuggler – an individual who facilitates the unauthorized movement of people across international borders, typically in exchange for financial or material gain.

Commissariat – Serbian Commissariat for Refugees and Migration, a governmental body primarily in charge of managing accommodation for people on the move in Serbia in official reception, asylum and transit centers.

MiO – the Ministry of Interior, a cabinet-level ministry in the Government of Serbia, responsible for local and national Police services with municipal and district branches throughout the country.

UNHCR – United Nations High Commissioner for Refugees is a UN agency mandated to aid and protect refugees, forcibly displaced communities, and stateless people, and to assist in their voluntary repatriation, local integration or resettlement to a third country.

Frontex – the European Border and Coast Guard Agency, is an agency of the European Union. In coordination with the border and coast guards of member states, it exercises border control of the European Schengen Area, a task within the area of freedom, security and justice domain.

I INTRODUCTION

The report before you provides an overview of key developments in the field of migration in Serbia during the period from January to March 2025. Through daily fieldwork and the provision of legal assistance, Klikaktiv has continued to monitor changes in migration flows, as well as all other circumstances affecting the rights and position of people on the move within the territory of the Republic of Serbia.

This report pays particular attention to alarming cases of deaths in asylum centers, as well as the growing insecurity in informal settlements. The first quarter of the year was marked by the continuation of unlawful practices, including pushbacks and increasingly limited access to basic rights—primarily healthcare.

The report also includes a legal analysis of the relevant normative frameworks, with a special fo-

cus on the inadequate implementation of regulations that guarantee the rights of asylum seekers and other foreigners. The role of international actors—especially Frontex—is also examined, along with the potential effects of new European Union policies on migrants and refugees in Serbia.

Findings on systemic obstacles in accessing institutions are also presented, including delays in the actions of competent authorities and the lack of institutional accountability in cases of rights violations.

Through the analysis of concrete cases, the report sheds light on the everyday realities faced by people on the move and emphasizes the urgent need for systemic change. The focus remains on documentation, public advocacy, and improving access to rights, with the aim of protecting the dignity of migrants and refugees.



Figure 1: One of the active squats in Obrenovac

Statistics in the First Quarter of 2025

According to official data from the Commissariat for Refugees and Migration, a total of 2,550 people on the move were present in the territory of Serbia between January and March 2025. This figure includes individuals accommodated in facilities designated for asylum seekers and refugees. The majority of people on the move originated from Afghanistan, Syria, and Turkey. The demographic structure is as follows:

- Men: 94 %
- Women: 6 %
- Adults: 89%
- Minors: 11%

More than half of these individuals—1,416 in total—were accommodated in the Reception Center in Preševo during this period. Most of them were brought there by police units from the northern parts of the country, following unsuccessful attempts to illegally cross the national border and enter the European Union.

Number of People on the Move in Asylum and Reception/Transit Centers in the First Quarter of 2025 - Top Five Countries of Origin -	
Nationality	Number of People
Afghanistan	604
Syria	364
Turkey	340
Egypt	289
Morocco	250

The occupancy rate across all centers was approximately 7%. At the end of March 2025, a total of 411 individuals were accommodated in asylum and reception centers. The largest number of residents was registered at the Reception Center in Preševo (99 individuals), followed by the Asylum Center in Krnjača (95 individuals), and the Asylum Center in Sjenica (74 individuals).

The majority of those accommodated in the centers were nationals of Ukraine, followed by nationals of Burundi and Turkey.

Presence in Asylum and Transit Centers by Nationality at the End of March 2025 - Top Five Countries of Origin -	
Nationality	Number of People
Ukraine	67
Turkey	48
Syria	44
Afghanistan	30
Burundi	27

At the end of the first quarter of 2025, a total of 87 individuals were registered by the Ministry of the Interior as persons who had expressed the intention to seek asylum. This means that only 3.4% of those accommodated in official camps actually had access to the asylum procedure. Furthermore, out of those 87 registered individuals, only 35 of them formally submitted an asylum application, indicating that just 1.4% of those accommodated in official camps enjoyed the rights guaranteed to asylum seekers.

The remaining 2,462 individuals did not have access to the asylum system and international protection, nor were they able to exercise the rights guaranteed to asylum seekers, including access to healthcare, the right to work, the right to personal documents, the right to education, and many others.

During the first quarter of 2025, the Asylum Office did not issue a single decision regarding asylum applications.

Expressed Intentions to Seek Asylum – First Quarter of 2025 - Top Four Countries of Origin -	
Nationality	Number of People
Russia	13
Syria	10
Egypt	10
Morocco	8

Asylum Applications Submitted – 2024 - Top Three Countries of Origin -	
Nationality	Number of People
Pakistan	6
Burundi	5
Russia	4

Between January and March 2025, the Ministry of the Interior issued 646 Decisions on Return to foreign nationals who were illegally residing on the territory of Serbia, primarily nationals of Russia, China, Afghanistan, and Turkey. Under the Law on Foreigners, a Decision on Return constitutes the first step in the procedure of forced removal and prevents the individual from subsequently applying for asylum in Serbia.

In accordance with Article 77 of the Law on Foreigners, a Decision on Return is issued to a foreigner who is unlawfully residing in Serbia and includes a deadline for voluntary return, which cannot exceed 30 days. An appeal against this decision may be submitted to the Ministry of the Interior; however, the appeal does not suspend the execution of the decision. This raises a legitimate concern as to whether filing an appeal with the same authority that issued the initial decision—especially when the appeal has no suspensive effect—can truly be considered an effective legal remedy. Also, these provisions of national legislation do not align with European Union standards, specifically with the provisions of the EU Return Directive (Directive 2008/115/EC). If the foreigner fails to comply with the order and does not leave the territory of Serbia voluntarily, the Ministry of the Interior may initiate a procedure for forced removal.

Decisions on Return – First Quarter of 2025
- Top Five Countries of Origin -

Nationality	Number of People
China	78
Turkey	61
Morocco	48
Afghanistan	48
Russia	45

In order to conduct forced removal, the Ministry of the Interior may also impose detention of foreigners in a Detention Center¹, which may last for up to 180 days. In the first three months of 2025, the Ministry of the Interior issued a total of 78 decisions on detention in Detention Centers, primarily to nationals of Afghanistan, Bangladesh, and Nepal.

The Law on Foreigners stipulates that appeal may not be lodged against a decision ordering detention. The only available remedy is to initiate an administrative dispute before the Administrative Court, and the deadline for filing a lawsuit is only eight days. Even in this case, the lawsuit does not suspend the execution of the decision, meaning that the forced removal procedure can be continued, regardless of the second instance procedure still pending.

It is also important to note that foreigners who are detained and/or undergoing forced removal proceedings are not entitled to free legal aid², which is also contrary to European Union standards. This means that any foreigner who wishes to initiate an administrative dispute against a detention order or a Decision on Return must independently find and pay for a lawyer, even though the minimum cost for such legal services amounts to 157,000 RSD (around 1.340 EUR), in accordance with the Attorney Tarif³ —an amount many cannot afford.

Rešenja o smeštaju u Prihvatište strance – prvi kvartal 2025
- četiri najčešće države porekla -

Nationality	Number of People
Afghanistan	25
Bangladesh	12
Nepal	12
Indonesia	7

However, not all individuals who were issued Decisions on Return or placed in detention were actually forcibly removed from Serbia. According to data from the Ministry of the Interior⁴, 35

¹ The Ministry of the Interior currently operates three Detention Centers for Foreigners: in Padinska Skela (a suburb of Belgrade), Plandište, and Dimitrovgrad.

² The Law on Foreigners ("Official Gazette of RS", nos. 24/2018, 31/2019, and 62/2023), as well as the Law on Free Legal Aid ("Official Gazette of RS", no. 87/2018), do not provide for the right to free legal aid for foreigners who have been placed in a Detention Center for Foreigners and/or who are subject to forced removal proceedings.

³ The stated cost covers only the submission of an appeal against the Decision on Return and a lawsuit before the Administrative Court against the Detention Decision, in accordance with the Attorney Fee Schedule. However, the total cost would also include expenses related to legal counseling, visits to the detention center to obtain power of attorney, and other associated services.

⁴ Letter of the Ministry of Internal Affairs no. 07-70/25 dated April 25, 2025, in response to Klikaktiv's request for access to information of public importance.

foreign nationals were forcibly removed during the reporting period, 11 of whom (6 nationals of Afghanistan, 3 of Morocco, and one each from Turkey and Algeria) were handed over to the border authorities of Bulgaria in accordance with the Readmission Agreement.

The Serbian Ministry of the Interior stated that “its officers escorted the remaining 24 individuals to a border crossing, but did not have information about the countries to which these persons were forcibly removed to—except in cases where the removal was carried out to the country of origin with police escort”.

According to the Ministry, the following individuals were escorted to the border crossing at Nikola Tesla Airport in Belgrade: 6 nationals of Bangladesh, 4 of Sri Lanka, 2 of Israel, and one each from Afghanistan, Palestine, Armenia, and Egypt. Also, 7 nationals of Indonesia were escorted to the border crossing at Morava Airport in Kraljevo.

Forcible Returns of Foreign Nationals Carried Out Between January and March 2025 - Based on the border crossing to which individuals were escorted by representatives of the Ministry of Internal Affairs of Serbia -			
Nationality	Nikola Tesla Airport (Belgrade)	Morava Airport (Kraljevo)	Gostun Border Crossing (Montenegro)
Afghanistan	1		
Palestine	1		
Bangladesh	6		
Sri Lanka	4		
Israel	2		
Armenia	1		
Egypt	1		
Indonesia		7	
Montenegro			1
TOTAL	16	7	1
	24		

Additionally, between January and the end of March 2025, Serbia continued to implement the Readmission Agreement with the European Union and accepted third-country nationals who were returned from neighboring Member States. During this period, Serbia accepted 27 third-country nationals from Croatia and one national of Turkey from Hungary, while no third-country nationals were returned from Romania. In accordance with the same Agreement, Serbia returned 11 third-country nationals to Bulgaria.

In addition to the Readmission Agreement with the European Union, Serbia also has bilateral readmission agreements with neighboring countries that are not EU members. Thus, 3 nationals of Nepal were returned to Serbia from Bosnia and Herzegovina, while Serbia did not return any third-country nationals to North Macedonia.

Readmission of Third-Country Nationals under the EU-Serbia Readmission Agreement and Bilateral Agreements with Bosnia and Herzegovina and North Macedonia				
Nationality	Returned from Croatia to Serbia	Returned from Hungary to Serbia	Returned from Serbia to Bulgaria	Returned from Bosnia and Herzegovina to Serbia
Afghanistan	6		6	
Palestine	7			
Syria	3			
Georgia	1			
Cuba	1			
Turkey	8	1		
North Macedonia	1			
Morocco			3	
Algeria			1	
Tunisia			1	
Nepal				3
TOTAL	27	1	11	3
	42			

Based on the Decree on Temporary Protection for Nationals of Ukraine, a total of 164 Ukrainian nationals were granted temporary protection in Serbia.

II KEY TRENDS AND EVENTS IN THE FIRST QUARTER OF 2025

Legal Framework and Institutional Developments

With regard to legislation, the beginning of 2025 did not bring significant changes in the domestic context. The current socio-political situation in the country⁵ has considerably slowed down the functioning of all institutions, including the Government and the National Assembly.

In the first quarter of 2025, the only legislative initiative related to people on the move was the Draft Law on the Rights of Missing Persons and Members of Their Families, prepared by the Ministry of Labour, Employment, Veteran and Social Affairs. This law does not cover all people on the move, but exclusively domestic nationals who went missing between 1991 and 1995 in the territory of the former Yugoslav republics, as well as between 1998 and 2000 in Kosovo.

The proposed law provides for employment facilitation, access to social and healthcare services, financial compensation, and housing solutions—where conditions allow—for missing persons and members of their families.

The draft defines three categories of missing persons: those found alive, those found deceased and buried, and those who are still unaccounted for. The benefits are primarily envisaged for individuals who have been found alive, while in cases where they were found deceased, the right to benefits is granted to their family members.⁶

Considering that the movement of people on the move—foreign nationals in particular—is becoming increasingly dangerous, and that the number of persons who go missing or perish along the route grows each year, such a legislative initiative should be extended to include this category of individuals, at least in areas such as access to social and healthcare services. This would demonstrate a humane approach toward this extremely vulnerable group of people who, while fleeing persecution and war, face numerous obstacles and challenges on their journey toward a place where they can feel safe.

When it comes to European legislation, it remains primarily focused on the implementation and operationalization of the new EU Pact on Migration and Asylum. In June 2024, after years of negotiation, a new pact was adopted with the aim of comprehensively reforming the Common European Asylum System (CEAS). Given that the Council of the EU granted member states a two-year deadline to align their national legislation with the newly adopted legal instruments, additional legislative initiatives are expected in the coming period to complement and complete the overall framework of the Pact.

One of the most frequently criticized legal instruments likely to be among the first to undergo revision is the so-called Return Directive (Directive 2008/115/EC)⁷, which regulates the return procedure for third-country nationals who are unlawfully present in the EU. According to this directive, such individuals must be

⁵ On November 1, 2024, a concrete canopy collapsed at the Novi Sad Railway Station, resulting in the deaths of 16 people and injuring many others. This tragedy sparked a wave of student and civil protests across Serbia, demanding accountability, transparency, and action against corruption. The protests included university and high school blockades, traffic disruptions, and symbolic acts such as 16 minutes of silence in memory of the victims. The demonstrations ultimately led to the resignation of the Prime Minister of the Republic of Serbia in February 2025.

⁶ „Na Nacionalnoj akademiji održana prva obuka na temu upravljanja migracijama“, *Paragraf*, 13. februar 2025. Available at: <https://www.paragraf.rs/dnevne-vesti/130225/130225-vest8.html>

⁷ Directive 2008/115/EC of the European Parliament and of the Council of 16 December 2008 on common standards and procedures in Member States for returning illegally staying third-country nationals, *EUR-Lex*. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32008L0115>

issued a Decision on Return requiring them to leave the territory of the European Union. However, available data show that only about a quarter of those who receive such a decision actually leave the EU.

For this reason, the European Commission proposed a targeted revision of the directive as early as 2018, aiming to improve the rules and simplify procedures across all member states. Since the process of adopting amendments has been slow, the Commission has attempted to increase return rates by enhancing operational cooperation—this includes return strategies and recommendations on mutual recognition of return decisions in order to speed up the return process. The new Migration Pact foresees additional changes in this area, such as a new border return procedure to be applied to third-country nationals whose asylum applications were rejected at the border, as well as the obligation for member states to issue joint decisions on asylum rejection and return.

Public attention has largely focused on the proposed establishment of so-called “return hubs” located in non-EU countries, with which EU member states would conclude bilateral agreements allowing them to return irregular migrants (asylum seekers whose applications have been rejected or migrants who have not applied for asylum and have no legal residence in the EU). Following the controversial agreement between Italy and Albania, it is reasonably assumed that Western Balkan countries, including Serbia, may become return hubs for migrants⁸—a possibility already hinted at by some Western states.

In her political guidelines for the 2024–2029 period, European Commission President Ursula von der Leyen announced the intention to develop a new common approach to returns, which would also include a shared strategy on the return process. The European Parliament has repeatedly emphasized the need to improve the effectiveness of return policies, while underlining the importance of aligning return sustainability with the respect for fundamental rights.⁹

Another legislative initiative directly linked to the issue of improving the effectiveness of returns was discussed during the first quarter of 2025. Namely, the European Commission plans to accelerate the revision of the concept of a safe third country, which would further strengthen mechanisms for the return of third-country nationals.

In asylum law, the concept of a safe third country is based on the assumption that a person fleeing persecution in their country of origin should seek protection in the first safe country they reach, rather than choosing the country in which to file an asylum application. According to this concept, if it is established that the asylum seeker could have applied for protection in a third country through which they previously transited and which is considered safe, their application in the country where asylum was requested may be found inadmissible without examination on the merits, and they may be redirected to that third country.

This concept is also utilized in the new EU Pact on Migration, as its application is foreseen by the Asylum Procedure Regulation. That regulation mandates that the concept of a safe third country must be reviewed by no later than 12 June 2025. However, the Commission is not obligated to propose legislative amendments. Although the deadline for revision is set for June, Commission President Ursula von der Leyen has expressed the intention to accelerate this process, and several proposed changes were already presented during the first quarter of 2025.

A common thread in all proposals to date is their increased restrictiveness, which in some respects departs from previously established legal standards. For example, one of the key conditions for applying the safe third country concept has been the existence of a clear and demonstrable connection between the asylum seeker and the country to which they would be returned. Current proposals from the European Commission consider entirely removing this criteria, replacing it with a transit-based requirement, or

⁸ "Government considering sending failed asylum seekers to Balkans," *BBC News*, 22 March 2024. Available at: <https://www.bbc.com/news/articles/cddyj8ge08po>

⁹ European Parliamentary Research Service, *The Return Directive (2008/115/EC): Implementation Assessment*, Briefing, February 2025. Available at: [https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/769499/EPRS_BRI\(2025\)769499_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/769499/EPRS_BRI(2025)769499_EN.pdf)

retaining it with greater flexibility. Eliminating or weakening the connection criterion would open the door to rejecting asylum applications solely on the basis that the person transited through a country listed as a safe third country.

Another significant proposed change concerns the right to appeal. Under the current rules, if an asylum application is found inadmissible on the basis of the safe third country concept, the applicant has the right to remain in the country while the court rules on the appeal—automatically suspending deportation. The proposed changes aim to remove this automatic suspension. Instead, the applicant would be required to specifically request the right to remain as part of the appeals process, or the court could rule on it *ex officio*.¹⁰

Such an approach to interpreting the safe third country concept in practice creates significant room for abuse and allows decision-makers to devote less attention to individual cases. An example of such practice was recorded in Serbian legislation, where the application of the safe third country concept as grounds for not deciding on asylum claims in merits was widely used by the Ministry of the Interior between 2008 and 2018, during the validity of the former Law on Asylum. During that period, the majority of asylum applications were found inadmissible on the grounds that the applicants had entered Serbia from North Macedonia or Bulgaria, both of which were on the list of safe third countries.

However, the Serbian authorities did not actually return asylum seekers to those third countries; instead, their procedures would end with a final decision by the Administrative Court, while the individuals remained physically present in Serbia without any rights—leading most of them to continue their journey illegally toward Western European countries. The current Law on Asylum and Temporary Protection, adopted in 2018, also provides for the dismissal of asylum claims through application of the safe third country concept, but this mechanism is used much less frequently in practice. In December 2024, the European Union Agency

for Asylum (EUAA) published the Guidelines on Alternatives to Detention, a legally non-binding document intended to assist national authorities of EU member states in harmonizing detention-related practices across the EU.

In the document, the EUAA proposes a range of measures that may be applied as alternatives to conventional detention, including: regular reporting to the competent authorities, financial guarantees, obligation to reside at a specific address, confiscation of travel documents, third-party sponsorship, and electronic monitoring.

All of these measures represent less restrictive forms of deprivation of liberty and should be applied in cases where detention could otherwise be imposed in accordance with the law. Although these alternatives are viewed as less severe and may be interpreted as a more humane approach to migration management, they also present a potential risk—by expanding the scope for applying such measures, there is a possibility of a significant increase in the number of individuals subjected to some form of restriction on freedom of movement.¹¹

Taking into account the legal instruments already adopted, as well as the plans of the European Commission and Parliament, it can be concluded that the coming period will likely see increased restrictiveness toward third-country nationals. This trend will manifest through the strengthening of institutional mechanisms enabling member states to more effectively prevent access to their territories.

However, alongside efforts to combat irregular migration and deter unauthorized entry into the EU, European institutions have also turned their attention to legal migration. In this area as well, several decisions were adopted that may be interpreted as steps toward gradually increasing restrictions within legal migration policy.

At the end of 2024, the Council of the European Union adopted conclusions outlined in the document Towards a More Strategic Approach

¹⁰ „Exclusive: Commission pushes to fast-track asylum rules review“, *Euractiv*, 6 March 2025. Available at: <https://www.euractiv.com/section/politics/news/exclusive-commission-pushes-to-fast-track-asylum-rules-review/>

¹¹ EUAA, „Guidelines on Alternatives to Detention“, January 2025. Available at: https://euaa.europa.eu/sites/default/files/publications/2025-01/2024_Guidelines_on_Alternatives_to_Detention_EN.pdf

on Visa Policy, which emphasized the need for a coordinated approach to visa policy in order to safeguard the security of the Schengen Area and respond effectively to abuses of the visa regime.

In this context, it was highlighted that the EU should not only make full use of existing mechanisms, but also develop new tools aimed at strengthening security, improving migration management, and enhancing cooperation with third countries. Among the key measures that member states are urged to focus on are: strengthening readmission mechanisms (Article 25a of the Visa Code), reducing the number of unfounded asylum claims, harmonizing visa policies, and preserving reciprocity in visa regimes (including relations with partners such as the United States).

Moreover, at the EU level, the need was stressed for revising the Visa Suspension Mechanism, which is currently under review, as well as for the full implementation of the Entry/Exit System (EES) and the European Travel Information and Authorization System (ETIAS).^{12 13}



Strengthening Institutional Capacities

The beginning of the calendar year often marks the start of the implementation of pre-defined plans. In the case of the Commissariat for Refugees and Migration (KIRS), in January 2025, the institution received accreditation from the National Academy for Public Administration to implement professional development programs within the public administration system.

Throughout 2025, KIRS officials will conduct accredited trainings in the areas of human rights protection, data confidentiality, and social services. Training sessions will be organized at the center in Plandište and will be intended for employees of state and local administrations, representatives of international and non-governmental organizations, as well as students interested in gaining additional knowledge in the field of migration.

The goal of this program is for KIRS to expand its implementation in the next phase beyond the borders of Serbia and to offer the same training content to government bodies and organizations in neighboring countries of the region.¹⁴

On the other hand, the start of the year also brought new training opportunities for KIRS staff. Representatives of the European Union Agency for Asylum (EUAA) held a training session titled Use of the ARC Application for Monitoring Accommodation Standards in Centers Managed by the Commissariat.

The ARC application was developed by the European Union Agency for Asylum and is designed for practical assessment of compliance with accommodation standards set by the EU. The aim of the training was to familiarize staff with the relevant standards and methodology for monitoring the quality of conditions in asy-

¹² EES (Entry/Exit System) is the EU's electronic system for recording the entry and exit of third-country nationals, while ETIAS (European Travel Information and Authorisation System) is a system for prior electronic travel authorization for citizens of visa-exempt countries traveling to the Schengen Area.

¹³ Council of the EU, *Visa Waiver Policy – Draft Council Conclusions*, Statewatch, 2025. Available at: <https://www.statewatch.org/media/4717/eu-council-vwp-visa-policy-draft-conclusions-14241-24.pdf>

¹⁴ Komesarijat za izbeglice i migracije, „Komesarijat dobio akreditaciju Nacionalne akademije za javnu upravu“, 2025. Available at: <https://kirs.gov.rs/cir/aktuelno/komesarijat-za-izbeglice-i-migracije-dobio-akreditaciju-nacionalne-akademije-za-javnu-upravu-za-sprovodenje-obuka-u-oblasti-upravljanja-migracijama/5622>

lum centers, as well as with methods for their implementation in practice.¹⁵

The beginning of 2025 brought significant developments for the Frontex mission in Serbia. In accordance with the new Status Agreement signed in June 2024, which considerably expanded Frontex's powers, major organizational changes occurred in the way the agency operates within the territory of Serbia.¹⁶

The Frontex mission has been present in the Western Balkans since 2019. In addition to Serbia, other countries in the region that are EU membership candidates have signed similar agreements with the agency. These agreements play a key role in the implementation of EU migration and border policy and contribute to its externalization—shifting border control beyond the EU's territory.

Frontex's powers in Western Balkan countries are extensive, and due to a lack of transparency, there is room for potential abuse. There is concern that the primary aim of these agreements is the establishment of a so-called buffer zone beyond the EU's external borders, in which regional countries would assume part of the responsibility for safeguarding the Union's borders.¹⁷

Specifically regarding Serbia, the 2024 agreement grants significantly expanded powers to the Frontex mission. The agency is authorized to carry out joint operations and deploy standing corps of the European Border and Coast Guard anywhere within Serbian territory, including borders with neighboring non-EU countries. The agreement also includes mechanisms for incident reporting, the appointment of a national Frontex coordinator, and the establishment of a permanent Frontex office in Serbia. In certain situations, Frontex officers may exercise

executive powers, including border monitoring and control, in accordance with Serbian law and under the supervision of domestic authorities.¹⁸

In line with these new powers, changes in Frontex's operations in Serbia have already been observed at the start of 2025. Since January, their officers have been present at the border with North Macedonia. Moreover, at entry points from Bulgaria and North Macedonia, Frontex representatives now play a much more active role than in previous years—during the information provision process to people on the move, they inform them, unlike members of the Serbian police, about the possibility of applying for asylum and accessing international protection in the Republic of Serbia, and subsequently refer them to the competent institutions responsible for conducting the asylum procedure. In addition, the number of Frontex personnel has increased significantly since the beginning of the year, and according to initial announcements, a multiple increase is expected throughout 2025 compared to the 111 officers deployed by the end of the previous year.¹⁹

¹⁵ Komesarijat za izbeglice i migracije, „Obuka za službenike Komesarijata od strane Evropske agencije za azil“, 2025. Dostupno na: <https://kirs.gov.rs/cir/aktuelno/obuka-za-sluzbenike-komesarijata-od-strane-evropske-agencije-za-azil/5691>

¹⁶ Klikaktiv – Centar za razvoj socijalnih politika, *Godišnji izveštaj za 2024. godinu*, Beograd, 2025. Available at: <https://static1.squarespace.com/>

¹⁷ Statewatch, „Violence at a Distance: Frontex's Increasing Role Outside the EU“, Bulletin 5, 2025. Available at: <https://www.statewatch.org/outsourcing-borders-monitoring-eu-externalisation-policy/bulletin-5/analysis-violence-at-a-distance-frontex-s-increasing-role-outside-the-eu/>

¹⁸ Klikaktiv – Centar za razvoj socijalnih politika, *Godišnji izveštaj za 2024. godinu*, Beograd, 2025. Available at: <https://static1.squarespace.com/>

¹⁹ Klikaktiv – Centar za razvoj socijalnih politika, *Internal reports*, unpublished.

Situation on the Ground and the Rising Number of Deaths and Disappearances

The winter months traditionally do not bring significant changes in migration movements, and the beginning of 2025 was no exception, showing no major deviations from the previous year. Official statistics indicate a continued trend of declining arrivals of people on the move. During the first quarter of 2025, the competent institutions of the Republic of Serbia registered a total of 2,550 individuals on the move who entered the country. As in previous years, these figures include only those who had some form of contact with official institutions such as the Ministry of the Interior (MoI) and the Commissariat for Refugees and Migration (CRM), while all those who crossed Serbia's territory illegally and unnoticed remain outside the scope of the data.^{20 21}

Smuggling networks have taken complete control over migration flows in Serbia. From the illegal border crossing, through transport and temporary accommodation, to organized attempts to leave the country (the so-called "game"), almost every aspect of migration is now under their control. In parallel with the growing influence of smugglers, trust in national institutions among people on the move continues to erode, making them increasingly invisible.

The main migration routes have remained the same as in previous years. Entry into Serbia most commonly occurs along the Balkan mountain range on the border with Bulgaria, while a significantly smaller number of people entered from the direction of North Macedonia. Exit points are still predominantly located in the

north of the country—along the borders with Hungary and Croatia. However, due to increasingly strict controls at official land border crossings, smugglers are more frequently directing migrants toward new, alternative exit routes.²²

Rivers are becoming increasingly popular locations for illegal border crossings. The Drina River, which forms the natural border between Serbia and Bosnia and Herzegovina, has long been used as an alternative route out of Serbia. Since the end of 2024, another river route has gained prominence—the Danube near Bezdan, on the border with Croatia. This crossing is particularly exploited by smugglers of Syrian origin, who use it to transport their compatriots into the European Union²³. Likewise, the Tisa River near the village of Martonoš is once again being used more frequently to cross the Serbian-Hungarian border.

Because of their unpredictable nature, rivers have often proven fatal for people on the move. In their eagerness to continue the journey as quickly as possible, migrants frequently accept risky and unsafe conditions without any real knowledge of the smugglers' actual plans. As a result, they are often forced into overcrowded and inadequate boats in the hope of reaching the other side.

The Drina River has for years been one of the deadliest locations along the Balkan migration route. Although the exact number of victims is difficult to determine, estimates suggest that since 2020, more than 90 people have drowned while attempting to cross the river.²⁴ In early 2025, a death was also recorded on the Danube, when residents near Bezdan spotted an unidentified body floating in the river.²⁵

²⁰ Klikaktiv – Centar za razvoj socijalnih politika, *Godišnji izveštaj za 2024. godinu*, Beograd, 2025. Available at: <https://static1.squarespace.com/>

²¹ Klikaktiv – Centar za razvoj socijalnih politika, *Annual Migration Statistics for 2025* (Data compiled from reports of the Ministry of the Interior, UNHCR statistics, and records of the Commissariat for Refugees and Migration)

²² Land borders with Hungary and Croatia are heavily guarded by the police forces of those countries. Numerous violations of the rights of people on the move have been recorded at these borders, including beatings, violent pushbacks, and denial of access to asylum. For more information, please refer to previous reports available at: <https://klikaktiv.org/>

²³ Klikaktiv – Centar za razvoj socijalnih politika, *Internal reports*, unpublished.

²⁴ 4D Trail, Database on Deaths and Disappearances of People on the Move along the Balkan Route, available at: <https://4dtrail.wordpress.com/>

²⁵ „Užas u Somboru: U Dunavu primećeno telo nepoznate osobe“, *Blic*, 2025. Available at: <https://www.blic.rs/vesti/>

The growing number of disappearances and deaths along the Balkan route is further confirmed by the increasing efforts of migrant families to find their missing relatives using every means available. In the absence of an institutional mechanism for tracing missing persons, families rely on international and domestic organizations working on migration issues, hire lawyers in the countries of last contact, or travel to the Balkans themselves in search of information. Klikaktiv recorded an increase in such requests for assistance during the end of 2024 and the beginning of 2025.²⁶

Given the increasing influence of smuggling networks, the growing danger of the routes, and the rising number of missing and deceased individuals, it is clear that the Balkan route is becoming more complex and riskier with each passing year. This calls for enhanced monitoring, continuous assessment of the situation, and timely responses by competent institutions and organizations providing support to people on the move.



hronika/uzas-u-somboru-u-dunavu-primeceno-telo-nepoznate-osobe/73qe6zk

²⁶ Klikaktiv – Centar za razvoj socijalnih politika, *Internal reports*, unpublished.

III OVERVIEW OF KLIKAKTIV'S WORK IN THE FIRST QUARTER OF 2025²⁷

Between January and March 2025, Klikaktiv continued providing legal, psychosocial, and humanitarian support to people on the move throughout Serbia. Through field visits, remote consultations, on-the-ground documentation, and advocacy activities, the organization monitored changes in migration flows, patterns of human rights violations, and institutional practices shaping the everyday lives of refugees and migrants in Serbia.

During this period, a total of 764 services were provided to 282 beneficiaries. The services included legal counseling (individual and group, in person and via the SOS line), psychosocial support, and the distribution of humanitarian aid, including hygiene kits, underwear, and socks. Most beneficiaries were from Afghanistan—making up as much as 94% of all users in March—followed to a lesser extent by individuals from Syria, Morocco, Pakistan, Eritrea, Ethiopia, Turkey, and Palestine. In the first quarter of 2025, Klikaktiv teams conducted 14 field visits at key migration points—Belgrade, Obrenovac, Subotica, Šid, and Sjenica—visiting 22 different informal settlements and actively monitoring living conditions and the presence of migrants.

This quarter saw a clear predominance of Afghan nationals among the organization's beneficiaries. While Afghans have been the most

represented group in previous years as well, a sharp decline in the number of Syrians was noted at the beginning of 2025. Although it is too early for definitive conclusions, this trend may be partially explained by the fall of the Bashar al-Assad regime and the initial stages of political consolidation in Syria. Additionally, the long-standing pattern continued wherein nearly all people on the move are adult men—a reality that may be linked to the increasing

risks associated with migration, particularly for women, children, and the elderly. Migration has become extremely difficult and dangerous, and young men are often the only ones physically and mentally capable of enduring the journey's physical and security challenges. Refugees also often rely on family reunification procedures, meaning that women and children remain in transit countries (most often Turkey) while their husbands set off alone for Western Europe with the hope of later bringing their families through reunification processes.

In addition to fieldwork, Klikaktiv also participated in public and educational activities related to migration in the first quarter of 2025. Representatives of the organization held a lecture for social welfare students from a university in Berlin, where they spoke about the situation on the Balkan route, the role of Frontex, and the externalization of EU borders. They also took part in the World Congress on Enforced Disappearances in Geneva, where they presented aspects of disappearances in the context of migration.

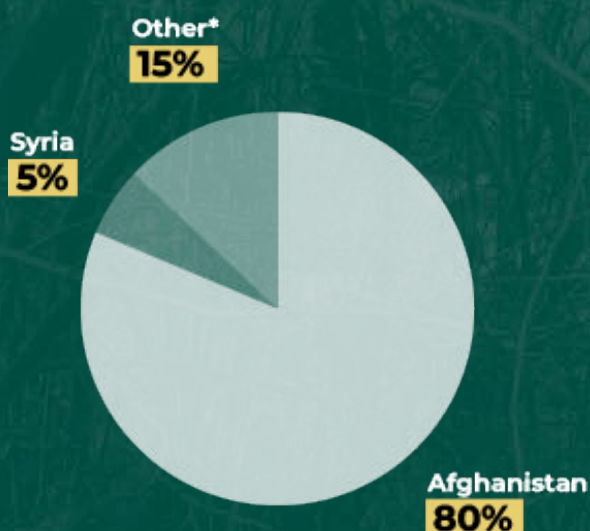
Through public appearances, interviews, and participation in panels, Klikaktiv contributed to raising awareness of deaths along the migration route—with a particular focus on the Drina River area and the issue of burying the remains of unidentified migrants. Organization representatives were also active in international networks and meetings, where they spoke about human rights violations against people on the move, new European policies, and the challenges faced by refugees and migrants. Through these activities, Klikaktiv contributed to the education of professionals, the strengthening of cross-sectoral cooperation, and to raising the visibility of the problems faced by people on the move along the Western Balkan route.

²⁷ This chapter is based exclusively on the organization's internal reports.

Overview of Klikaktiv's Work in the First Quarter of 2025 (January–March)

During the first quarter of 2025, Klikaktiv continued providing legal, psychosocial, and humanitarian support to people on the move across Serbia. Between January and March, the following activity indicators were recorded:

- **Total number of services provided** (legal counseling, psychosocial support, and humanitarian aid): **764**
- **Representation of women and children**, including unaccompanied minors, among beneficiaries was only **6%**, indicating a decline in the presence of this population in squats and informal gathering sites compared to the previous year
- **Countries of origin of beneficiaries:**
 - The vast majority of people on the move came from Afghanistan – **80%**.
 - The share of individuals from Syria was significantly lower– only **5%**.
 - The remaining 15% included persons from Morocco, Pakistan, Turkey (mainly Kurds), Palestine, Egypt, Uzbekistan, Eritrea, Ethiopia, and Croatia



- **Number of field visits conducted:** **14**
- **Number of squats visited:** **22**. **No new squats were identified** during this period



*Other– Morocco, Pakistan, Turkey, Palestine, Egypt, Uzbekistan, Eritrea, Ethiopia, and Croatia

- **Geographic coverage of border activities** included the external border with the European Union (**Hungary, Romania, and Croatia**) as well as the border with **Bosnia and Herzegovina**



Additional:

21 media engagements, guest lectures, interviews with researchers, and participation in conferences and other migration-related events

15 humanitarian workers, volunteers, and activists were provided with legal information and training

Field Work

In terms of migration flows, certain changes in migration patterns were observed. The borders with Bulgaria and North Macedonia continue to be the most commonly used entry points into Serbia; however, the number of arrivals from North Macedonia has significantly declined, making the Balkan Mountains area the dominant entry route. The main exit points remain unchanged—the borders with Hungary and Bosnia and Herzegovina continue to be the primary directions of onward migration, while the route toward Croatia is used to a much lesser extent, as it is perceived by migrants as less accessible.

In an effort to cross Serbia's territory quickly and without being noticed, people on the move travel in small, discreet groups and avoid prolonged stays. Movement mostly takes place at night and in the early morning hours. The presence of intensive police patrols along the borders with Hungary and Bosnia and Herzegovina, as well as Frontex's deployment at the Hungarian border, continues to shape migration routes and visibility.

During its field work in this period, Klikaktiv documented several patterns of human rights violations. People on the move who were apprehended by the police after pushbacks or during raids were often unlawfully detained, brought before misdemeanor judges, and sentenced for illegal stay or illegal border crossing. They were then transferred to asylum centers in Sjenica and Preševo, without access to systemic legal assistance. Although reports of pushbacks slightly declined in this quarter, cases of personal belongings being confiscated and violence during police raids continued—particularly in Belgrade and in squats.

Disappearances of people, especially along the Tisa and Drina rivers, remain a significant concern. Klikaktiv continues to conduct research and advocacy on this issue.

Southern Borders of Serbia and Previous Transit Countries Along the Balkan Route

Most of the refugees interviewed by Klikaktiv during the first quarter of 2025 reported that they had reached Serbia via Bulgaria and Turkey. When asked why they chose to continue their journey from Turkey through Bulgaria instead of Greece, most of them responded that their smuggler had guaranteed that the route through Bulgaria was shorter and that they would reach their desired destination more quickly. They also stated that they paid the smuggler an average of €3,000 for the journey from Turkey to Serbia, after which they would negotiate the next stage of travel while in Serbia. The cost of onward travel depended on the choice of the next country, the method of border crossing, and other circumstances.

Following the trend from 2024, refugees continued to report violence by Bulgarian police, particularly at the border between Bulgaria and Turkey. Most of them had been pushed back multiple times from Bulgaria to Turkey and reported that the Bulgarian police used physical force, police dogs, beatings, and kicking during these pushbacks. They also stated that their money, mobile phones, and other valuables were stolen from them. The journey across Bulgarian territory, like that across Serbia, was fully organized by smugglers.

Aside from the pushbacks at the Turkish-Bulgarian border, refugees did not have any contact with Bulgarian authorities. Most of them spent only a few days in Bulgaria, in private accommodations arranged by smugglers. Refugees crossed the border into Serbia on foot via the Balkan Mountains, staying in the mountains between two and five days.

In February and March 2025, Klikaktiv collected testimonies from refugees about the presence of Frontex officers on the Bulgarian side of the border, predominantly German police officers. On the other hand, refugees reported no contact with Serbian police or Frontex officers on the Serbian side of the border but unanimously stated that there was a strong fear of being caught and deported. As a result, they avoided main roads, public transportation, and any contact with in-

stitutional representatives. According to refugee testimonies, the area from the border to the city of Pirot is perceived as a "danger zone" because the Serbian police reportedly deport everyone they apprehend in that area back to Bulgaria.

Serbia–Hungary Border

At the border with Hungary—particularly near Horgoš, in the squat known as Vitaminka—increased activity and the presence of people on the move were recorded for the first time in a while. However, they are only sporadically visible during the day, typically as individuals or in small groups. This is due to frequent patrols by border police and Frontex officers, the risk of being reported by local residents, and fear of arrest. For these reasons, most activity takes place at night or in the early morning hours, while during the day, people hide in abandoned buildings or stay in private accommodations, most often arranged through smuggling networks. They return to the squats shortly before attempting to cross the border. Short stays in the same location and movement in small groups have become a recognizable pattern in this border area.

During the first quarter of the year, refugees increasingly reported coordinated actions between the Hungarian and Serbian police in the context of pushbacks. Although physical violence by the Hungarian police was significantly less frequent during this period compared to previous years, people on the move who are intercepted are most often handed over to the Serbian police. Their subsequent treatment varies—most are taken to police stations in Subotica or Kanjiža, where they remain for several hours or up to several days, often in inadequate and unsanitary conditions, in overcrowded rooms and frequently without access to food or water.

Afterward, some individuals are brought before misdemeanor judges or issued Decisions on Return. A significant number are then transferred to the Reception Center in Preševo, but they rarely stay there long and soon attempt to return to the Hungarian border. The journey from the official camp in Preševo to Belgrade—or directly to the north of the country—is organized by smugglers, and refugees pay between €150 and €250 per person for this service.



Figure 2: One of the active squats near the Hungarian border

Serbia–Croatia Border

During the first three months of 2025, the situation at the border with Croatia—particularly in the Šid area—remained calm, with limited visibility of people on the move. Although no individuals were directly encountered, certain locations showed signs of occasional use. A squat near an illegal landfill, close to the Šid–Tovarnik border crossing, appeared active—there was a large tent set up, along with dishes, women's slippers, and other items, indicating the presence of women and possibly families. According to unofficial sources, the location is occasionally used by families in contact with smugglers. Official camps in Adaševci and next to the Šid train station were closed, with no staff or residents. In abandoned barracks near the train station, food remnants and torn camp cards were found, suggesting periodic use. Identical food boxes were also recorded at the squat near the landfill, which may indicate a shared smuggling network. In the forested area near Batrovci, no people were encountered, but traces of campfires, cans, and cleared paths indicated recent activity. A long line of trucks on the highway suggests that the so-called “truck game”—attempting to enter cargo vehicles at the border—continues to be used. The pattern of movement in this border area remains similar to other crossings: brief stays immediately prior to crossing, movement in small groups, predominantly at night, and under the coordination of smuggling networks.

At the Serbia–Croatia border, in the village of Principovac, there is an official camp that accommodates only unaccompanied minors. However, the camp is fairly inaccessible—it is located on the outskirts of the village and only a few meters from the border line, with no public transportation available to reach it. This deters most unaccompanied minors from seeking shelter and protection there. As in the camp in Sjenica, the majority of minors placed in Principovac are brought there by the police, while self-initiated arrivals are rare. All unaccompanied minors that Klikaktiv spoke with during this period stated that the camp in Principovac is too far away and difficult to reach on their own, and that they would rather remain with the rest of their group outside the formal protection system until they cross the border and continue their journey westward.

At the end of March 2025, Klikaktiv spoke with two unaccompanied minors from Afghanistan who had been taken to the camp in Principovac by police after being handed over by Hungarian authorities at the northern border. The minors were first held at the police station in Kanjiža, where they were issued Decisions on Return stating their age as 18, even though both had immediately stated their real age. As a result, during their detention, the legal procedure, and the issuance of the Decision on Return, neither of the unaccompanied minors was appointed a legal guardian. However, despite the police not treating them as minors during the issuance of the decision, they were subsequently transferred to the Principovac camp, which accommodates only unaccompanied minors. At the time Klikaktiv's team spoke with them, both boys had with them the Decision on Return issued by the Ministry of the Interior and the so-called “camp card” from the Principovac camp, as shown in the photo below.

The unaccompanied minors complained about the conditions in the Principovac camp, stating that they did not receive food regularly and that the camp security repeatedly warned them to “leave the camp as soon as possible” during the two days they stayed there.

“

We were alone in the room during our stay at the camp, but we felt uncomfortable and were afraid to leave the room because the security kept telling us that we should leave the camp. I think we were the only Afghans there at the time, but I'm not sure. I didn't really see anyone else, except for the security.

— Unaccompanied minor from Afghanistan, on accommodation conditions in the Principovac camp

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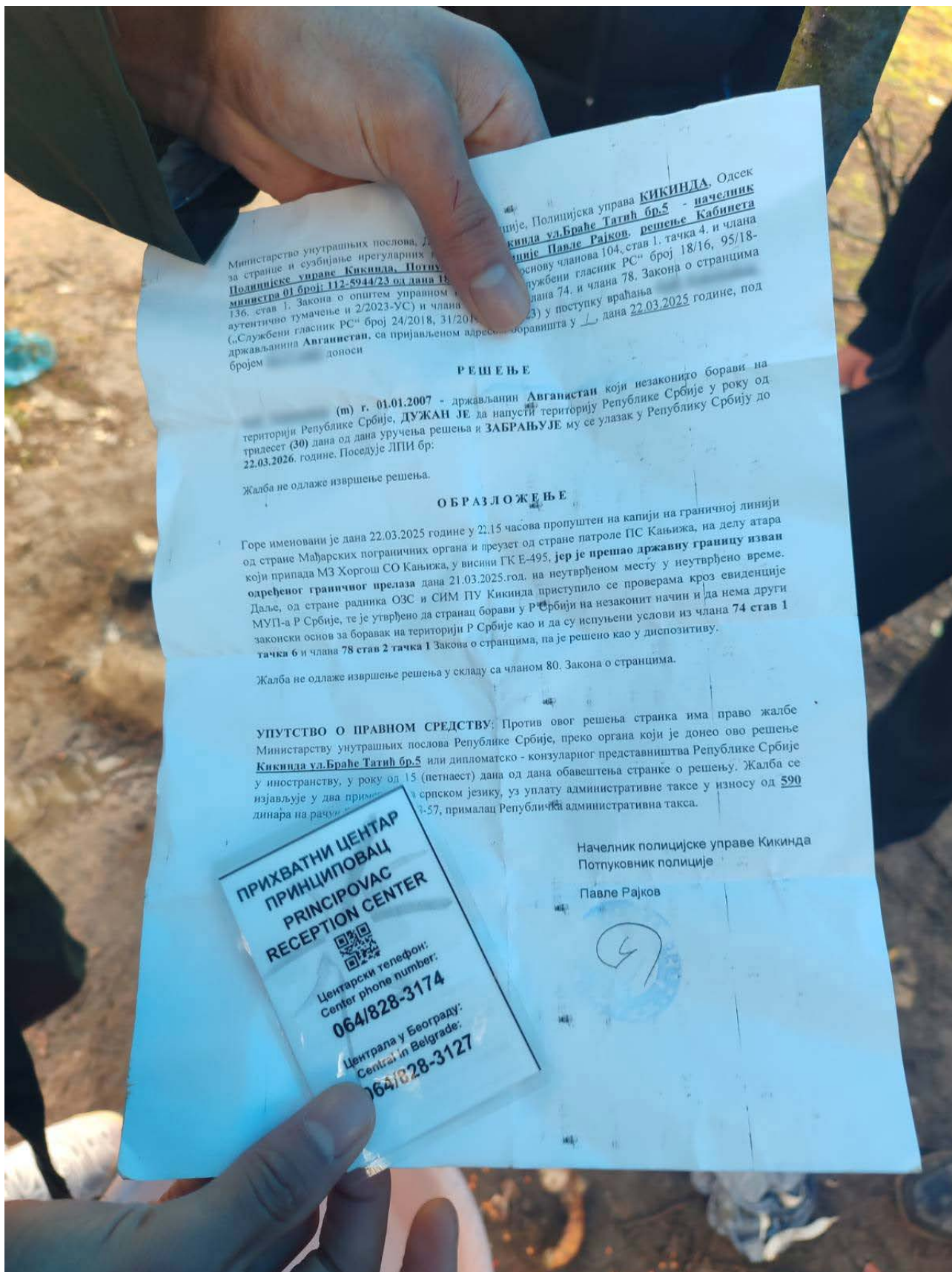


Figure 3: Decision on Return issued to an individual from Afghanistan

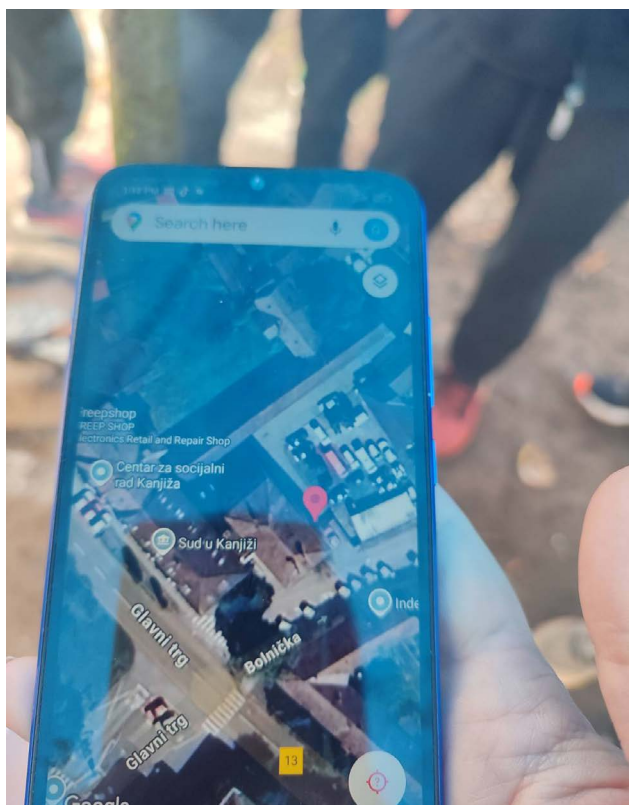


Figure 4: Unaccompanied minors showing the Klikaktiv team the location in Kanjiža where they were held by the police

Serbia–Bosnia and Herzegovina Border

The border with Bosnia and Herzegovina remained active during this reporting period, although a greater number of people on the move appeared to be directed toward Hungary. While crossing this border is generally more affordable, the risks remain high—primarily due to the water level and unpredictability of the Drina River, as well as the fact that most people struggle in cold and fast-moving water, even if they know how to swim.

One defining feature of this area continues to be the pronounced invisibility of people on the move—both within local communities and in previously used squats, which have appeared abandoned for quite some time. A pattern similar to that observed at the Hungarian border was noted: stays near the border are brief and usually take place just before attempted crossings, with people most often arriving by taxi or private transport organized by smugglers. Movements occur in small groups, typically at

night or in the early morning hours.

During field visits in this period, no visible border patrols were observed. The absence of institutional presence—combined with a complete lack of humanitarian infrastructure—further complicates the situation and increases the risks faced by people on the move, particularly during adverse weather conditions or in situations requiring urgent assistance or intervention.

Belgrade

The situation in Belgrade remained largely unchanged—fewer people were observed in public spaces, such as the park near the old bus station, but the city still functions as an important transit hub. Most migrants in Belgrade stay in private accommodations. Klikaktiv identified several such locations in the city (hostels, private houses, and apartments) where refugees stayed during their short-term transit before heading to the “game.”

Particular attention was given to the situation in Obrenovac, where, during January and February, the number of people staying near the asylum center significantly declined. People on the move increasingly opted for private accommodation in the surrounding area and used nearby forests as temporary gathering spots before continuing toward Hungary. Encounters with migrants were rare and brief. However, in March, a significant change occurred—a new squat formed near the asylum center, with between 50 and 100 individuals present at any given time. People stayed in the squat briefly, on average five to ten days, and the group consisted mainly of adult men from Afghanistan, with a smaller number of unaccompanied minors. Many were exhausted and suffering from health issues, including foot injuries and scabies infections.

Some individuals expressed interest in applying for asylum in Serbia, stating they lacked the funds to continue their journey—though none initially intended to stay in the country. Smugglers were present but did not interfere with the access of NGOs to the squat. However, by late March, the first reports of physical altercations between smugglers at the site began to emerge.



Figure 5: One of the active squats in Obrenovac

Most people interviewed by Klikaktiv were unaware that they were located just a few hundred meters from an official asylum center. Furthermore, according to the Asylum Office, not a single asylum registration certification was issued at the Obrenovac asylum center during the first three months of 2025, indicating a lack of effective access to asylum at this location. Although a significant number of Afghan nationals stayed in the squat in front of the asylum center, there were no Afghan nationals accommodated within the center itself during this period.

In the first quarter of 2025, the asylum center in Obrenovac hosted primarily nationals of Burundi (16 individuals), followed by nationals of Russia, Syria, Bosnia and Herzegovina, and North Macedonia (two individuals from each of these countries).

Klikaktiv provided direct assistance to individuals staying outside the asylum center through legal counseling, psychosocial support, and the distribution of non-food items. Most of those interviewed expressed a desire for more information about the EU asylum process and the potential impact of transiting through Serbia on asylum procedures in their destination countries.

In the meantime, Serbian authorities announced plans to close the asylum center in Krnjača and relocate families to Obrenovac or another asylum center, but by the end of March, there was no confirmation that this had actually occurred.

The case of Obrenovac in the first quarter of 2025 illustrates the broader dynamics of migration: faster transit, increasing vulnerability and dependence on smuggling networks, and the continued absence of institutional support for people on the move outside of official camps.

Sjenica

At the asylum center in Sjenica, the population consists mostly of smugglers, individuals with serious mental health conditions, and migrants who were transferred there by the police after being found in private accommodation—most often in Belgrade. There were no voluntary arrivals; all interviewees confirmed that no one came to the camp on their own initiative.

The smugglers—who make up the majority of the camp population—are mostly individuals who have been in Serbia for years, speak fluent Serbian, and previously lived in places like Sombor or Subotica. Most openly admit to engaging in smuggling activities, which suggests tacit tolerance—or even support—for their presence by the Commissariat for Refugees and Migration (CRM) and the police.

In addition to them, the camp houses a number of individuals with severe psychological disorders, with whom attempts to establish communication have thus far yielded little progress.

Particular concern was raised by an incident in the first half of February, when a man from Morocco died under unclear circumstances after being denied admission to the Sjenica center by the camp administration. Unofficial sources indicate that he had previously been expelled from the Reception Center in Preševo.

One of the questions that arises indirectly in connection with this tragic incident relates to the criteria and procedures used to determine in which asylum center a person will be placed. For some time now, the Ministry of the Interior and the Commissariat for Refugees and Migration have been applying an unlawful practice that allows individuals who are not part of the asylum procedure to be accommodated in both asylum and reception centers. This directly affects the rights these individuals can exercise in the Republic of Serbia—rights which, under the Law on Asylum and Temporary Protection, are guaranteed exclusively to asylum seekers—and creates confusion among people on the move regarding their legal status.

This practice also raises questions regarding transfers—that is, how people on the move are relocated from one center to another. On the ground, among migrants themselves, an informal distinction has been established between asylum centers intended for registered asylum seekers and those to which people without regulated legal status are sent. However, the transfer procedure itself is not clearly defined in the current legal framework and currently depends entirely on informal decisions made by CRM officials.

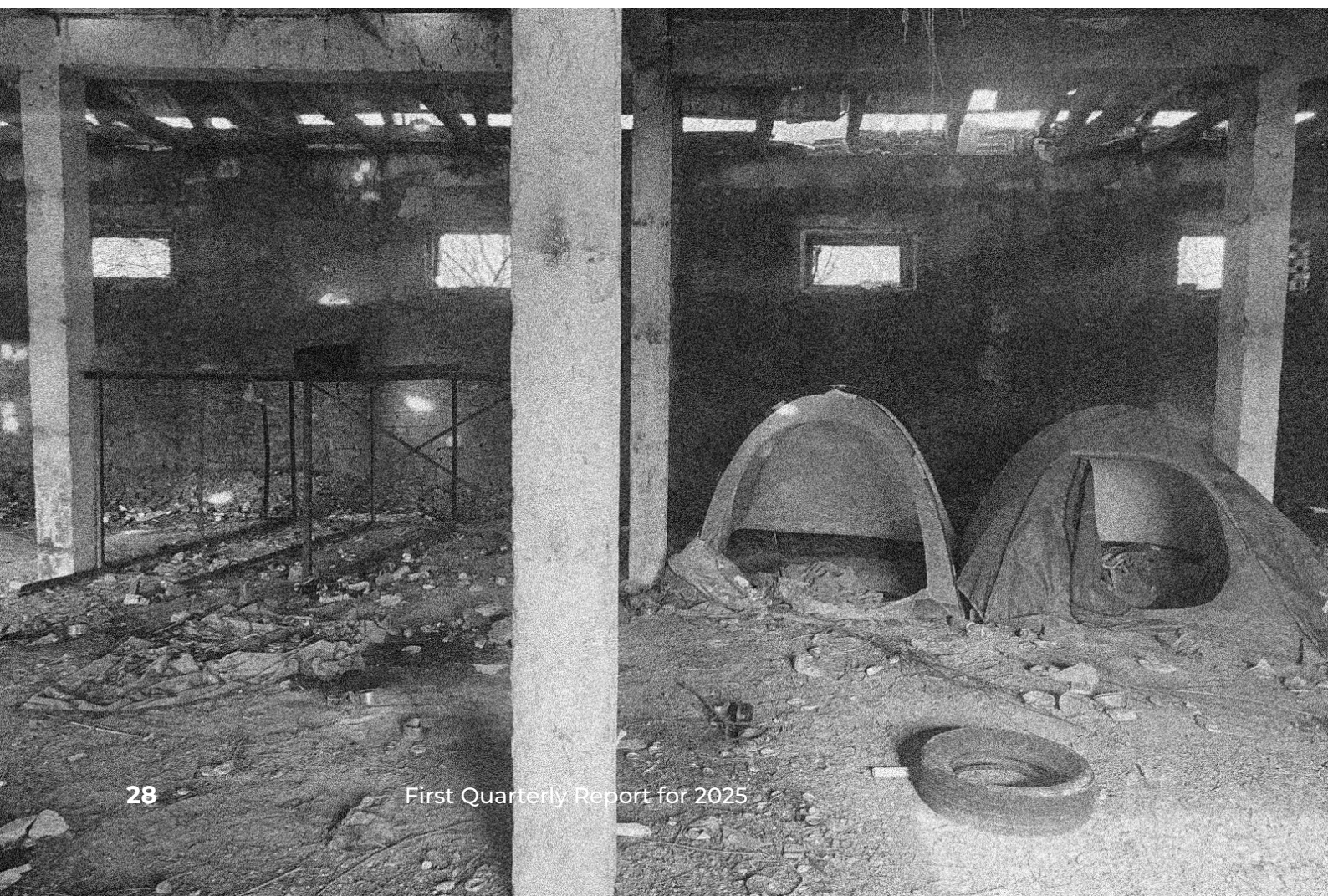
Legal Support and Training

In the first three months of 2025, Klikaktiv continued to provide free legal aid and support to people on the move, asylum seekers, and refugees. People on the move primarily lacked information about their legal status, the rights they were entitled to, and the potential consequences of having an unregulated status in Serbia. Many of them—especially those whom Klikaktiv’s team met in the Obrenovac squat or along the northern borders—stated that they were completely unaware that they could apply for asylum in Serbia and regularize their stay. In their view, Serbia was merely a transit country, and most believed that any contact with the police would result in detention and/or deportation to a previous country along the route or to their country of origin. For this reason, they avoided contact with state institutions.

However, this fear is not unfounded, as Klikaktiv continued to document the Ministry of the Interior’s practice of issuing Decisions on Return to people on the move almost automat-

ically, without any assessment of whether the individual might be in need of international protection. Between January and March 2025, the Ministry issued 646 Decisions on Return, while only 87 individuals were registered as asylum seekers.

Klikaktiv also continued to document the initiation of misdemeanor proceedings against people on the move for illegal entry into the territory of Serbia (Article 121(1), point 1 of the Law on Foreigners) or for illegal stay in Serbia (Article 122(1), point 2 of the same law), with highly inconsistent rulings from misdemeanor courts regarding the penalties imposed. During the reporting period, Klikaktiv recorded cases in which the Misdemeanor Court in Subotica issued warnings, while the Misdemeanor Court in Belgrade imposed fines of 50,000 RSD (around 430 EUR), which were converted into prison sentences.



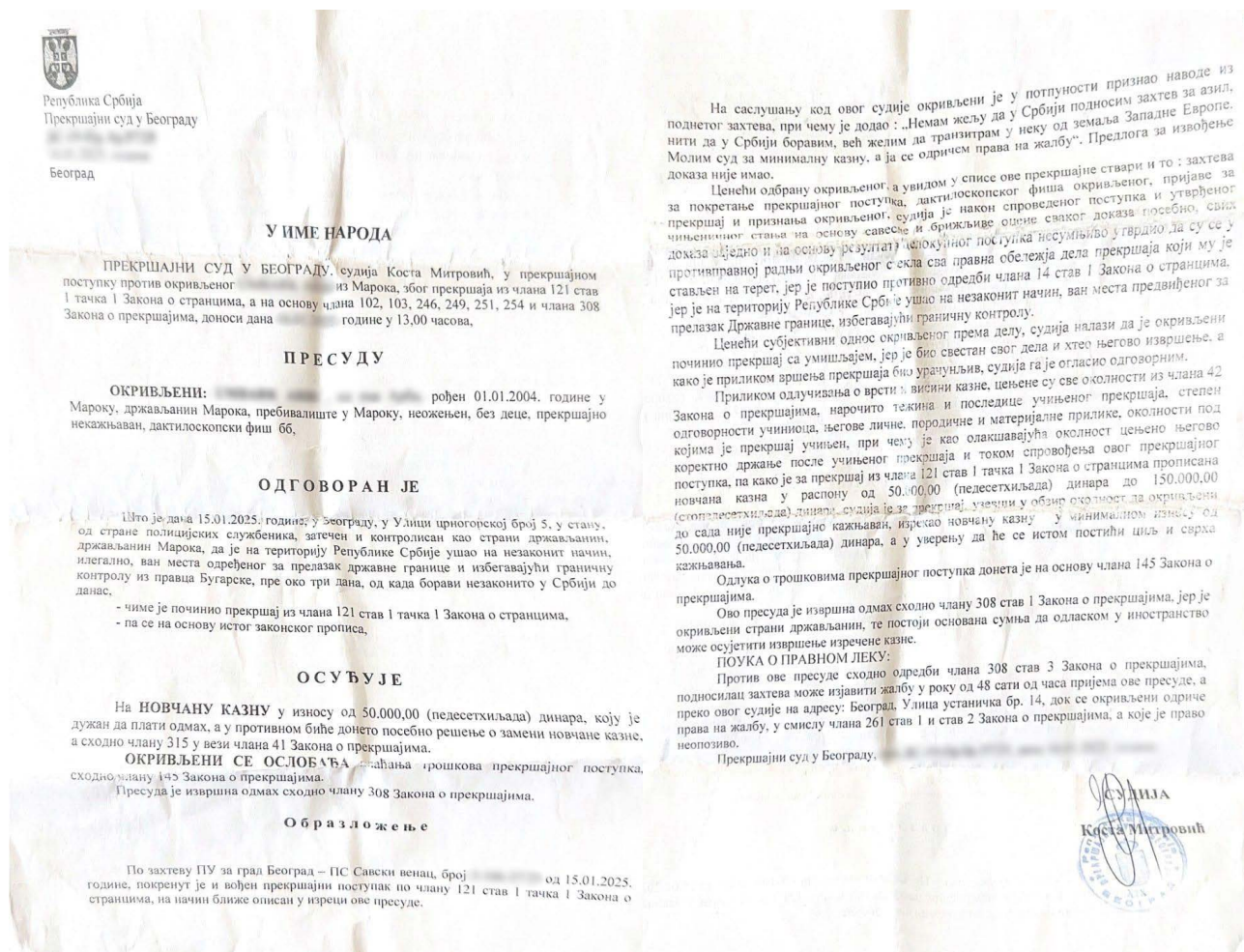


Figure 6: Misdemeanor Court ruling in Belgrade against a person from Morocco for illegal entry into the territory of Serbia

Judgments reviewed by Klikaktiv revealed that courts often failed to provide interpreters during proceedings, and that migrants had no access to legal assistance. Furthermore, despite the absence of interpreters or legal assistance, judgments frequently stated that migrants had waived their right to appeal—thereby denying them access to an effective legal remedy.

Klikaktiv also continued to represent asylum seekers in asylum proceedings before the competent authorities, and noted the extreme length and inefficiency of proceedings before the Administrative Court. In some cases, more than two years had passed since the lawsuit was filed, without the court taking any procedural action.

Another significant institutional obstacle was the discriminatory practice of banks, which continued to refuse to open bank accounts for asylum seekers, despite clear recommendations from the Commissioner for the Protection of Equality. In cooperation with UNHCR, Klikaktiv supported clients in overcoming this barrier.

Psychosocial Support

Between January and March 2025, in addition to continuously providing free legal aid, Klikaktiv also continued delivering psychosocial support to people on the move who were in acute need. Given the specific circumstances faced by this population — including uncertainty, prolonged exposure to stress, lack of stability, and limited access to basic services — psychosocial support was primarily focused on the provision of psychological first aid. These interventions aimed to alleviate acute emotional distress, particularly feelings of anxiety, fear, and helplessness, which often arose as a result of border violence, family separation, and insecure legal status.



Figure 7: Toy found in one of the squats near the border with Hungary

Special attention was given to identifying users' additional needs and referring them to other available support systems, particularly health-care institutions. These activities were of vital importance, considering that most people on the move are located in close proximity to the European Union border, making their daily lives extremely unstable and almost entirely focused on continuing their journey. In such a context, concern for one's physical and mental health is often neglected. Therefore, one of the key roles of the team was to support individuals in making decisions that contribute to the preservation of their health.

During this reporting period, Klikaktiv documented several individual cases in which bene-

ficiaries experienced serious physical injuries or faced mental health difficulties requiring additional attention and support. In such situations, the Klikaktiv team, in cooperation with other actors on the ground, provided essential information, psychological support, and facilitated access to health and social services. Timely response proved crucial in preventing further complications and protecting the fundamental rights of the beneficiaries.

Public Engagement and Advocacy

In the area of public engagement and international cooperation, Klikaktiv remained active on multiple fronts. The organization participated in the World Congress on Enforced Disappearances in Geneva, attended coordination meetings with EU representatives and embassies, and provided several statements to international media outlets, including BBC Serbia — particularly in relation to the emergence of so-called “return centers.” Klikaktiv also organized training sessions for volunteers and field workers on rights and obligations in the asylum procedure, took part in the establishment of new solidarity networks along the Balkan route focused on cases of search, rescue, and disappearance of people on the move, and contributed to Serbia's preparations for the upcoming United Nations session on human rights, specifically advocating for the adoption of the Law on Missing Persons to include people on the move.

Missing Persons in Serbia

In addition to its regular activities, Klikaktiv conducted an in-depth investigation into the rising number of deaths along the Drina River. As border control intensifies in the north, people on the move increasingly choose this more dangerous river route. While crossing appears easier during summer, the river has become a deadly trap.

At least 92 bodies have been recovered to date, although the actual number is believed to be significantly higher. People most often drown while swimming or attempting to cross in overcrowded inflatable boats. The deadliest incident occurred in August 2024, when a boat capsized and 12 people — including a baby — drowned. The identities of most victims were never established. There is no unified database of missing persons, and DNA identification is rarely conducted. Families are left without information, and victims are buried anonymously. Klikaktiv documented numerous institutional failures — from the absence of forensic infrastructure and the failure to store biological samples, to the lack of communication with families. Some rare good practices do exist, such as the marking of graves with prosecution case file numbers (e.g. in Šabac), while in Bosnia and Herzegovina there have been positive examples of permanent grave markings.

Since the beginning of 2025, reports of missing people on the move have become more frequent, further indicating that the Balkan route is becoming increasingly dangerous and fraught with challenges. Unable to obtain official answers from Serbian authorities, family members of the missing often turn to organizations like Klikaktiv for assistance or hire lawyers in the last known country of residence. During the first quarter of 2025, Klikaktiv's legal team was contacted by four families regarding missing persons believed to have last been seen in Serbia. All four cases involved Moroccan nationals. In each case, Klikaktiv took all available steps — contacting hospitals, cemeteries, local authorities, and public prosecutors, and formally reporting the disappearances to the competent institutions. However, as of the time of writing, none of the missing individuals have been found, and there is still no information regarding their fate.

Unfortunately, during this reporting period,

Klikaktiv staff documented two deaths of migrants, both of whom had been residing in the asylum center in Sjenica. It is particularly concerning that both individuals suffered from serious health conditions, raising questions about the responsibility of KIRS officials and the overall management of asylum and reception centers. As previously stated in this report, asylum centers are not exclusively inhabited by asylum seekers, but also by individuals without any regulated legal status in Serbia. As a result, their rights are not clearly defined, leaving room for arbitrary practices by KIRS staff. In such circumstances, the scope of rights accessible to individuals on the move often depends on the goodwill of officials and on informal practices that have become institutionalized over time.

However, this is not the only legally undefined and problematic area of center management. KIRS, at its own discretion and without a clearly prescribed legal procedure, determines which organizations may access asylum and reception centers and to what extent. In doing so, the institution directly impacts the scope and quality of services available to people on the move.

The main victims of such arbitrary and legally ungrounded practices are the center's users themselves. Due to a lack of transparency, organization, and systemic accountability, they are often exposed to serious consequences.

Klikaktiv calls for urgent reforms — the establishment of a central missing persons database, the standardization of identification procedures, proactive communication with families, and the formal recognition of the role of civil society. The organization has also raised concerns about the troubling emergence of “premium” smuggling services, which include guaranteed identification and burial in the event of death.

All of Klikaktiv's activities during the first quarter of 2025 confirm its essential role in protecting the rights of people on the move in Serbia. Amid increasingly restrictive controls, reduced institutional support, and rising risks, the organization remains committed to its mission — providing direct assistance, documenting rights violations, and advocating for systemic changes toward more humane migration governance.

IV GUIDELINES FOR FUTURE ACTION AND MONITORING

Klikaktiv will closely monitor the development of European Union regulations, the jurisprudence of relevant international courts, and potential bilateral agreements with Western Balkan countries aimed at establishing "return hubs" for migrants without regulated residence status in the EU, as well as the possible designation of these countries as "safe third countries" in asylum procedures. Given that Serbia's legislation is not harmonized with EU standards in the areas of detention and forced removal procedures, and that access to asylum remains entirely ineffective, Klikaktiv emphasizes that Serbia must not be considered a viable candidate for establishing return hubs, nor can it be deemed a safe third country.

At the same time, it remains essential to monitor the conduct of Serbian police toward people on the move. Special attention must be paid to the actions of border police at airports, due to the frequent practice of automatically returning individuals to the country of departure without any prior assessment of their individual circumstances. Klikaktiv highlights that this practice is contrary to European Union and international legal standards and that the Ministry of Interior must not continue implementing forced removals of foreign nationals in an undefined direction — that is, transferring individuals to air border crossings without determining the country of return or whether such return is safe for the person concerned.

Beyond documentation and ongoing monitoring, Klikaktiv will continue to oppose this practice through all available means, including initiating requests for interim measures before the European Court of Human Rights.

In the upcoming period, Klikaktiv will maintain a strong presence at Serbia's entry and exit points, as well as at all critical locations along the Balkan Route passing through the country. Particular emphasis will be placed on cases of death and disappearance along the route. The organization will continue addressing the competent institutions and advocating for systemic solutions, drawing attention to this increasingly pressing and growing issue, while also documenting and informing families searching for their loved ones.

An additional situation that is becoming increasingly alarming and requires close attention in the coming months involves asylum seekers and other individuals residing in asylum centers who are in need of healthcare, especially mental health services. In this context, the actions of CRM staff, as well as of organizations with direct access to the centers and direct contact with asylum seekers, must be closely monitored. Further attention must be given to the fact that CRM arbitrarily determines which organizations may access official asylum and reception centers, and to what extent, without clearly defined criteria. Consequently, CRM bears additional responsibility for any omissions — including, as documented in this report, those that have resulted in tragic outcomes.

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