



PERMANENT MISSION OF PORTUGAL  
GENEVA

DH - 2 /2026

The Permanent Mission of Portugal to the United Nations Office and other International Organizations in Geneva presents its compliments to the Special Procedures Branch of the Office of the United Nations High Commissioner for Human Rights and, with reference to the joint communication of the Special Rapporteur on the independence of judges and lawyers and the Special Rapporteur on the human rights of migrants (**AL PRT 1/2025**), dated 10 November 2025, has the honour to enclose herewith the observations of the Portuguese authorities concerning reports of obstacles faced by lawyers in accessing services of the Agency for Integration, Migration and Asylum (AIMA).

The Permanent Mission of Portugal avails itself of this opportunity to renew to the Special Procedures Branch of the Office of the United Nations High Commissioner for Human Rights the assurances of its highest consideration.

Geneva, 05 January 2026



Special Procedures Branch  
Office of the United Nations High Commissioner  
for Human Rights  
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## **Observations from the Portuguese Government to the Joint Communication of the Special Rapporteur on the independence of judges and lawyers and the Special Rapporteur on the human rights of migrants (AL PRT 1/2025)**

The Portuguese Ministry of Foreign Affairs acknowledges the receipt of the letter sent by the Special Rapporteur on the independence of judges and lawyers, Ms. Margaret Satterthwaite, and the Special Rapporteur on the human rights of migrants, Mr. Gehad Madi, to H. E. Mr. Paulo Rangel, Minister of State and Foreign Affairs, on 10 November 2025.

We reiterate our support to their mandates as well as our openness to cooperate with Ms. Satterthwaite and Mr. Madi, as indeed with all Human Rights Council Special Procedures mandate-holders, whose independence and impartiality we value.

In response to the communication received, which has been given our fullest and most careful attention, the Portuguese Government reaffirms its commitment to international human rights principles and to the standards of good public administration, ensuring that all citizens and legal representatives have effective and dignified access to the services provided by AIMA – Agency for Integration, Migration and Asylum.

In the municipality of Lisbon, the area with the highest demand from lawyers, the Lisbon II – Anjos Office is the official contact point for providing information regarding AIMA's services, without the need for prior appointment.

The facilities located at Avenida António Augusto de Aguiar, which house the Agency's headquarters, are exclusively reserved for pre-scheduled appointments, as expressly indicated on the institutional website, ensuring organisation, predictability, and proper public notice.

More specifically, with regard to in-person assistance, it should be noted that the Anjos Office offers a dedicated ticketing system and service desk for lawyers and legal representatives, without any limitation on numbers, being naturally subject only to the opening hours of the premises.

On average, between 35 and 45 professionals are attended to daily at this Office, at a desk specifically designated for that purpose. Additionally, with respect to the specific situation reported concerning joint attendance of lawyers and their clients, clear guidelines have been disseminated (and are being duly followed) to ensure effective accompaniment under dignified conditions, including the provision of an additional chair.

It should further be noted that a considerable number of complaints submitted by lawyers arise from a clear misunderstanding between priority service (often invoked in the submissions received, from which lawyers do not benefit) and the prerogative of preferential access vis-à-vis citizens, which lawyers do indeed possess in general public services. It is worth recalling that, for many years, this prerogative has been exercised by the legal community and public services with particular sensitivity, given that the overt



exercise of such priority is not always understood by the public and may even lead to disorder within public spaces among citizens who do not grasp this circumstance.

It should also be added that preferential access may only be exercised during periods in which in-person information services are available to the public. AIMA has published on its institutional website the specific periods during which such services are provided, which can be easily consulted, and these periods are likewise duly posted within the service areas. The remainder of the opening hours is allocated to pre-scheduled appointments and collection of biometric data.

In line with the above, and regarding the preferential service for lawyers across other AIMA Offices, it is important to highlight that, in accordance with the applicable legislation, AIMA strictly complies with the provisions of Resolution of the Council of Ministers No. 86/2024, of 9 July, which regulates the public dissemination of preferential service schedules, particularly subparagraph (a) of point 1:

“1 – Determine that all public administration services and entities providing in-person assistance to the public, and over which the Government exercises powers of direction, supervision, or oversight:

a) Ensure a schedule for in-person service to the public, without the need for prior appointment, on a daily basis, depending on the nature of the service, and simultaneously promote the adequate, complete, and updated dissemination of information regarding such service, guaranteeing consistency between the information available on their websites and that displayed at physical service locations;”

Furthermore, a direct communication channel has been established between AIMA and the Portuguese Bar Association, intended to provide faster and better-substantiated responses to queries submitted by legal professionals in the exercise of their duties.

Regarding access to information and consultation of case files, AIMA is committed to ensuring that citizens and their representatives are able to remotely monitor the information pertaining to their processes.

Digital solutions are planned for 2026 that will optimise and simplify access, ensuring greater efficiency and transparency. In this respect, the processes currently being handled by the Task Force for the Recovery of Pending Cases at AIMA — created in September 2024 and involving the collaboration of 1.000 lawyers and solicitors in the instruction of more than 600,000 residence permit applications which had remained pending for years — have already increased interaction with citizens, and the new Renewals Portal also enables closer monitoring of case status by applicants.

In the coming weeks, a new digital procedure will be launched to allow for faster responses to electronic communications submitted by citizens. In addition, a specific channel has been made available for foreign citizens and their representatives to submit documents required for pending cases, thereby expediting the instruction phase.

It should also be noted that residence permit applications currently take an average of 54 days to be decided. For this to remain possible, it is essential that all stakeholders contribute to the correct submission of applications, as delays in decision-making most



frequently result from deficiently instructed case files. Indeed, and somewhat unexpectedly, we have observed an increase in procedural practices that are not applicable within administrative proceedings, causing unnecessary disruptions in case instruction.

With regard to complaints submitted through the Complaints Book system, we would inform that all Offices have, in full compliance with the applicable legislation, the required Complaints Book.

However, in the interest of transparency, we acknowledge that only one Office — Santarém — experienced temporary unavailability of the Yellow Book (Livro Amarelo). Nevertheless, this did not prevent the submission of complaints, which were duly registered in SGIREX system on official letterhead sheets, stamped by the Office.

The first complaint entered in SGIREX system on official letterhead is dated 28/05/2025 and the last 07/10/2025, amounting to:

- 21 complaints in total;
- 4 complaints submitted by lawyers;
- 2 complaints do not refer to the unavailability of the Yellow Book;
- 2 complaints mention the unavailability of the Yellow Book, although the complaints themselves did not concern this issue directly, but rather matters related to the complainants' clients' processes;
- 17 complaints submitted by persons who were neither lawyers nor legal representatives, none of which concerned the absence of the Yellow Book.

After October 2025, the Yellow Book became available again at this Office, thereby fully restoring normal procedures.

With respect to this matter, we would also note that AIMA is in the process of adopting the Electronic Yellow Book and is likewise developing a mechanism that will allow for automatic analysis of complaints submitted, enabling easier identification and faster correction of procedures, thus improving the service provided to those who rely on the Agency.

Also relevant to this topic is a report submitted to [REDACTED] the Portuguese Bar Association, [REDACTED], [REDACTED], prompting intervention by the Committee on the Rights and Prerogatives of the Legal Profession.

This Committee issued a Decision considering inadmissible any limitation on the exercise of legal representation, invoking constitutional rights to information (Article 268 of the Constitution) and provisions of the CPA and LADA. It therefore concluded that AIMA's actions lacked justification and ordered notification of both the Agency and the complainant.

This situation triggered an internal audit. Specific clarifications were requested [REDACTED], [REDACTED], but no response was submitted, making it impossible to substantiate the alleged facts. Following the internal proceedings, the complainant formally requested to withdraw the complaint, acknowledging the efforts made by the Agency and the Government to resolve the identified difficulties.



Nevertheless, preventive measures were implemented, including the internal dissemination of the Bar Association's Decision to the Omnichannel Access Department (OMNI – front office), strengthening good practices for facilitating access for legal professionals.

Finally, it is important to note that AIMA is implementing several modernisation and digital transformation initiatives, with a strong focus on reducing response times and improving the quality of service provided. These efforts aim not only to meet immediate needs but also to align the Agency's services with international standards of administrative efficiency and respect for citizens' fundamental rights.