



Brussels, 25.11.2025
C(2025) 7843 final

REPORT FROM THE COMMISSION
pursuant to Article 159(2) of the Withdrawal Agreement

REPORT FROM THE COMMISSION

pursuant to Article 159(2) of the Withdrawal Agreement

Contents

1. Introduction	2
2. Overall assessment of the implementation of Part Two of the Withdrawal Agreement	2
3. Measures taken to implement or comply with Part Two of the Withdrawal Agreement	3
a. Measures taken at Union level	3
i. Legal acts to implement Part Two of the Withdrawal Agreement	3
ii. Promoting the effective implementation of Part Two of the Withdrawal Agreement	4
iii. Monitoring of implementation of Part Two of the Withdrawal Agreement	6
iv. Enforcement of Part Two of the Withdrawal Agreement	8
b. Measures taken at EU Member States level	12
4. Complaints	12
Statistical aspects	14

1. Introduction

In accordance with the EU-UK Withdrawal Agreement¹, the European Commission and the UK's Independent Monitoring Authority (IMA) shall, on an annual basis, inform the Specialised Committee on Citizens' Rights referred to in point (a) of Article 165(1) of the Withdrawal Agreement on the implementation and application of Part Two thereof in the Union and in the United Kingdom, respectively. The information provided shall, in particular, cover measures taken to implement or comply with Part Two and the number and nature of complaints received.

This report is the fourth Commission report under the above-mentioned obligation and covers the year 2024.

The previous three reports of the Commission² are available on [the Commission's website on citizens' rights part of the Withdrawal Agreement](#).

2. Overall assessment of the implementation of Part Two of the Withdrawal Agreement

The Commission remains fully committed to protecting citizens' rights in accordance with the obligations under the Withdrawal Agreement.

The EU commitment to protect citizens' rights remains key, as expressed by the EU co-chairs of the Specialised Committee on Citizens' Rights and of the Joint Committee. These are bodies established by the Withdrawal Agreement to supervise and facilitate its implementation and application and to seek ways of preventing problems³.

The commitment to the full, timely and faithful implementation of the Withdrawal Agreement was also reaffirmed by leaders of the European Union and the United Kingdom in the first EU-UK Summit, held in London on 19 May 2025.

The joint commitment of the Commission and the EU Member States to implement the Withdrawal Agreement correctly and fully is reflected on the ground, with the implementation of the Withdrawal Agreement in EU Member States being satisfactory.

As the Withdrawal Agreement forms part of EU law, the Commission acts as its guardian in accordance with Article 17 of the Treaty on European Union.

The Commission has the task of ensuring the uniform and correct application of the Withdrawal Agreement throughout the Union under the control of the Court of Justice of the European Union. It gathers information to monitor EU Member States' compliance with the Withdrawal Agreement and enforces it.

¹ Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community, OJ L 29, 31.1.2020, p. 7–187, http://data.europa.eu/eli/treaty/withd_2020/sign.

² Reports from the Commission pursuant to Article 159(2) of the Withdrawal Agreement, C(2022)7851 final, C(2023)8412 final and C(2024)7806 final.

³ Joint statements from the Joint Committee and the Specialised Committee on Citizens' Rights are available at [the Commission's website on the governance of the Withdrawal Agreement](#).

Overall, for most UK beneficiaries the transition from EU law on free movement of EU citizens to the Withdrawal Agreement has been smooth. Some issues of implementation remain, most of which are of a technical nature.

Identified concerns are addressed by Member States, with guidance and assistance from the Commission. Overall, Member States take a pragmatic approach to solving problems encountered by UK beneficiaries. On this basis, there were fewer issues drawn to the Commission's attention in 2024 by the United Kingdom, external stakeholders, or individual UK beneficiaries compared to the previous year.

The Commission continues to promote the Withdrawal Agreement's effective implementation by supporting Member States in their implementation efforts. Teams within the Commission work together on monitoring, enforcing, and promoting the effective implementation of the Withdrawal Agreement. They coordinate a network across the Member States and engage bilaterally with Member States at expert level the moment an issue is identified to seek clarifications and assurances. The focus on pragmatic resolution helps to resolve issues before any formal enforcement measures are needed. The Commission prioritises cases that are cross-cutting and systemic or affect bigger groups of beneficiaries.

The Commission's role is mirrored in the United Kingdom by the Independent Monitoring Authority, which is an internal watchdog within the United Kingdom established by the Withdrawal Agreement to have monitoring and enforcement powers similar to those the Commission has vis-à-vis EU Member States.

3. Measures taken to implement or comply with Part Two of the Withdrawal Agreement

This report covers measures taken at Union level as well as those taken by EU Member States.

a. Measures taken at Union level

i. Legal acts to implement Part Two of the Withdrawal Agreement

To further facilitate cross-border travel of Withdrawal Agreement beneficiaries, the Schengen visa application form was amended to have an explicit reference to Withdrawal Agreement beneficiaries.

This was done by Regulation (EU) 2023/2667⁴, which amended the relevant annex of the Visa Code. The formal amendment of the Schengen visa application form became applicable on 28 June 2024.

⁴ Regulation (EU) 2023/2667 of the European Parliament and of the Council of 22 November 2023 amending Regulations (EC) No 767/2008, (EC) No 810/2009 and (EU) 2017/2226 of the European Parliament and of the Council, Council Regulations (EC) No 693/2003 and (EC) No 694/2003 and Convention implementing the Schengen Agreement, as regards the digitalisation of the visa procedure, OJ L, 2023/2667, 7.12.2023.

ii. Promoting the effective implementation of Part Two of the Withdrawal Agreement

The Commission also promotes the effective implementation of the Withdrawal Agreement, where necessary, by adopting legal acts implementing Part Two of the Withdrawal Agreement and providing guidance to harmonise the implementation at national level.

Working with the European Parliament and Member States

The Commission continued to report regularly to the European Parliament, in particular to the [UK Contact Group](#).

Close cooperation with Member States is vital to promote the effective implementation and application of the Withdrawal Agreement.

The Commission continued to work closely with the Council and in particular the Council's Working Party on the United Kingdom that assists Coreper and the Council in all matters pertaining to the relationship with the United Kingdom. Citizens' rights are regularly discussed at the meetings of the Working Party to ensure that the Withdrawal Agreement is correctly implemented.

To promote the uniform application of Part Two of the Withdrawal Agreement in EU Member States after the end of the transition period, the Commission has regularly provided guidance and legal advice to the Working Party.

Residence rights and rights of workers and self-employed persons

In 2024, there was no need to hold any meeting of [the Expert Group on the right to free movement of persons \(Directive 2004/38/EC\)](#) which also deals with the implementation of the residence rights provisions of the Withdrawal Agreement.

However, throughout the reporting year the Commission provided guidance to the Expert Group on the following matters regarding Chapter One of Title II of Part Two:

- Withdrawal Agreement beneficiaries' and their joining family members' exemption from the Entry/Exit System and the European Travel Information and Authorisation System and the need for national information/communication campaigns; and
- the principle of proportionality in relation to absences from the host State that exceed the duration of absence permitted under the Withdrawal Agreement.

With respect to Chapters Two (*rights of workers and self-employed persons*) and Three (*professional qualifications*) of Title II of Part Two, the Commission continued in 2024 to provide guidance to Member States and beneficiaries of the Withdrawal Agreement to ensure the correct implementation of the Withdrawal Agreement. In November, the Commission updated the Advisory Committee on Free Movement of Workers on the developments concerning the Withdrawal Agreement.

Coordination of social security systems

Regarding Title III, the Withdrawal Agreement's rules on coordination of social security systems are designed to protect those who were in a cross-border situation involving both the United Kingdom and (at least) one EU Member State at the end of the transition period.

From the legal and administrative point of view, the Withdrawal Agreement provides for the continuation of the rules and practices pursuant to EU Regulations⁵ governing social security coordination applicable to the United Kingdom when it was still an EU Member State.

The Withdrawal Agreement is implemented by the Member States in the same way as EU Regulations, including a role for the Administrative Commission, a body in charge in particular with dealing with all administrative questions or questions of interpretation arising from the provisions of EU Regulations governing coordination of social security systems at the EU level.

In 2024, the Commission continued to provide guidance to Member States and beneficiaries of the Withdrawal Agreement on the Withdrawal Agreement's rules on coordination of social security systems.

Travel

To further facilitate travel of Withdrawal Agreement beneficiaries and take account of the rights of Withdrawal Agreement beneficiaries in the context of the Schengen acquis, the Commission updated the following Annexes:

- Annex 22 (List of residence permits issued by Member States) to include the titles of documents that Withdrawal Agreement beneficiaries in host States with declaratory schemes may use to evidence their beneficiary status before holding a Withdrawal Agreement residence document; and
- Annex 43 (Specimen of documents that beneficiaries of the Withdrawal Agreements (EU-UK, IS/LI/NO-UK, CH-UK) may hold before being in possession of the new residence document issued either in accordance with Commission Implementing Decision (EU) 2022/1945 of 21 February 2020 or in accordance with the Withdrawal Agreements concluded by Iceland, Liechtenstein and Norway on the one hand and Switzerland on the other hand) containing the specimen of documents relevant for the application of the Withdrawal Agreement.

Furthermore, the Commission adopted on 26 July 2024 a Recommendation establishing a Practical Handbook to be used by Member States' competent authorities when carrying out tasks related to the Entry/Exit System ('EES Handbook').

The EES Handbook contains operational guidelines, recommendations and best practices for the implementation and management of the Entry/Exit System. It also provides guidance on aspects concerning Withdrawal Agreement beneficiaries and their family members.

⁵ Regulation (EC) No 883/2004 of the European Parliament and of the Council of 29 April 2004 on the coordination of social security systems, OJ L 166, 30.4.2004, p. 1–123 and Regulation (EC) No 987/2009 of the European Parliament and of the Council of 16 September 2009 laying down the procedure for implementing Regulation (EC) No 883/2004 on the coordination of social security systems, OJ L 284, 30.10.2009, p. 1–42.

The revised Visa Code Handbook that was adopted on 26 June 2024 includes a section explaining the handling of visa applications made under the Withdrawal Agreement⁶.

The Commission moreover published [a guidance note](#) on how the Entry/Exit System will work for Withdrawal Agreement beneficiaries.

Information and awareness raising

In 2024, the Commission greatly expanded [its website](#) that serves as a gateway for all Withdrawal Agreement beneficiaries, taking into account feedback from stakeholders.

New guidance notes covered rules for family members joining UK nationals, entry visas for family members of UK nationals, the right of permanent residence, absences and loss of residence status as well as the Entry/Exit System.

The website provides ten updated guidance documents on the implementation of the citizens' rights part of the Withdrawal Agreement and also key information about national residence schemes for each EU Member State.

Working with external stakeholders

The Commission also engaged with stakeholders representing EU citizens living in the United Kingdom and UK nationals living in the EU and academics to get a better picture of experience of the Withdrawal Agreement on the ground and for external stakeholders and their networks to disseminate wider information about the Withdrawal Agreement and its interpretation.

iii. Monitoring of implementation of Part Two of the Withdrawal Agreement

In monitoring and enforcing the Withdrawal Agreement, the Commission plays its role as guardian of EU law, complementing work of other institutions and stakeholders at local, regional, national and European level.

Despite the unique nature of the Withdrawal Agreement, the Commission has used much of the standard monitoring and enforcement toolkit it uses with respect to EU law that the Withdrawal Agreement has grandfathered, such as EU law on free movement of EU citizens or coordination of social security schemes.

The Commission has the task of ensuring the uniform and correct application of the Withdrawal Agreement throughout the Union under the control of the Court of Justice of the European Union. It gathers information to monitor EU Member States' compliance with the Withdrawal Agreement and enforces it.

The Commission continued proactively to review national laws, regulations and administrative provisions brought into force to implement the Withdrawal Agreement.

⁶ Annex to the Commission Implementing Decision amending Commission Decision C(2010) 1620 final as regards the replacement of the Handbook for the processing of visa applications and the modification of issued visas (Visa Code Handbook I), C(2024) 4319 final, available at https://home-affairs.ec.europa.eu/document/download/1d79f44d-49ba-4847-951e-129f924b1051_en.

Information has also been provided by civil society stakeholders representing UK beneficiaries living in EU Member States. Engagement has helped the Commission to better understand the impact of the Withdrawal Agreement on the ground and identify emerging issues. The Commission worked with external stakeholders to provide clarifications on the interpretation of the Withdrawal Agreement.

The cooperation with stakeholder networks continued to be useful to identify concerns. The Commission also continued to receive complaints in 2024. Section 5 covers this in more detail.

Some of the bilateral and horizontal exchanges with Member States were based on information provided by the United Kingdom (including in the Specialised Committee on Citizens' Rights and the Joint Committee). Other exchanges were based on Member States' questions or the Commission's own investigations.

Where issues were identified, they were discussed informally with the Member States concerned to seek early resolution ensuring that national rules were quickly brought in line with the Withdrawal Agreement and that any potential impact on the rights under the Withdrawal Agreement was kept to a minimum.

Horizontal monitoring of all Member States

In 2024, the Commission carried out a comprehensive review and contacted all Member States to gather information on the following areas:

- how Member States apply the principle of proportionality in cases where Withdrawal Agreement beneficiaries have exceeded the absences permitted by the Withdrawal Agreement; and
- Member States' national information and communication campaigns regarding exemption from the Entry/Exit System and the European Travel Information and Authorisation System for Withdrawal Agreement beneficiaries' and their joining family members.

The Commission followed up with Member States, where relevant.

Bilateral monitoring of implementation in individual Member States

In 2024, the Commission had bilateral exchanges with Member States concerned to share information on or obtain (further) feedback regarding the following matters:

- healthcare charge for economically inactive Withdrawal Agreement beneficiaries with a non-permanent right of residence;
- equal treatment of Withdrawal Agreement beneficiaries in relation to health screening;
- absence rules applying during the first five years of a child's residence in the host State where the parent has already obtained permanent residence under the Withdrawal Agreement;
- Article 11 of the Withdrawal Agreement regarding the absence at the end of the transition period of a person having already acquired the right of permanent residence;
- requirement to register in the host State a marriage that took place before the end of the transition period;

- return, as of 2021, of EU citizens from the United Kingdom to their Member State of nationality together with family members who are United Kingdom nationals;
- multiple statuses;
- issuance of a residence document under the Withdrawal Agreement with a permanent residence indication before the expiry of the already held document related to non-permanent residence;
- temporary documents issued under the Withdrawal Agreement in relation to exemption from the Entry/Exit System and the European Travel Information and Authorisation System for Withdrawal Agreement beneficiaries' and their joining family members;
- online information regarding visas for joining family members, including on visa fees;
- availability of appointments for the issuance of residence documents under the Withdrawal Agreement;
- recognition of durable partners for the purpose of joining the beneficiary in the host State; and
- process of applying for a residence document under the Withdrawal Agreement with a permanent residence indication.

iv. Enforcement of Part Two of the Withdrawal Agreement

Internal dimension

Overall, the Commission considers that EU Member States have implemented Part Two of the Withdrawal Agreement in a satisfactory manner.

Some issues of implementation remain, most of which are of a technical nature.

The Commission in 2024 bilaterally raised the issue of implementation and application of the citizens' right part of the Withdrawal Agreement with Member States in relation to the following ten subject matters.

Only few issues are still actively discussed with the Member States concerned.

A. Comprehensive sickness insurance requirement

This issue was covered in point a) of Section 4.iv of the previous annual report.

Since 2023, the Commission has had several written exchanges and meetings with one Member State regarding the application of the comprehensive sickness insurance requirement of Article 7(1)(b) of Directive 2004/38/EC.

The exchanges continued into 2024, including a meeting in June.

B. Handling of late applications

In 2024, the Commission had written exchanges and a meeting with one Member State regarding its handling of late applications for Withdrawal Agreement beneficiary status under Article 18(1)(d) of the Withdrawal Agreement.

While the Commission has no indication that the Member State breached its obligations under the Withdrawal Agreement, the objective of the exchange is to better understand the Member State's late applications policy in light of the rate of unsuccessful late applications.

The exchanges continued into 2025, including a meeting in May.

C. Issuing Withdrawal Agreement residence documents to United Kingdom nationals and family members

This issue was covered in point f) of Section 4.iv of the previous annual report.

Since 2021, the Commission has monitored the relevant Member State's process of issuing Withdrawal Agreement residence documents to United Kingdom nationals and their family members, including the availability of appointments.

In 2024, the exchanges, which included a letter and a meeting in March that year, concerned the number of residence documents issued to United Kingdom nationals and their family members as well as the process and the availability of appointments for issuing second copies or renewing the Withdrawal Agreement residence document.

The Commission continues to closely monitor the process of issuing the Withdrawal Agreement residence document in that Member State.

D. Permanent and non-permanent right of residence

This issue was covered in point d) of Section 4.iv of the previous annual report.

In the context of the Commission's 2022 review of the nature of the non-permanent right of residence and the switch from a non-permanent right of residence to the right of permanent residence in Member States with a constitutive residence scheme, the Commission identified one Member State as not being in compliance with the Withdrawal Agreement, given that it provided for the expiry of the right of non-permanent residence and required a second constitutive application for permanent residence.

Following the Commission's exchanges with that Member State in 2023 and the latter's change of approach as a matter of practice, the Member State concerned prepared draft legislation in 2024 to remedy the matter.

The legislation was adopted by the Member State's Parliament on 25 April 2025. This matter has been resolved.

E. Excessive sufficient resources requirement

In 2024, the Commission had exchanges with one Member State regarding an excessive requirement to hold sufficient resources in the context of recognising the acquisition of the permanent right of residence.

The Member State concerned removed the excessive requirement from its legislation in 2024. This matter has been resolved.

F. Equal treatment in accessing municipal housing

In 2024, following the receipt of a complaint, the Commission had exchanges with a Member State regarding the matter of equal treatment of Withdrawal Agreement beneficiaries with a non-permanent right of residence in accessing municipal housing in one region of that Member State.

The Member State concerned resolved the individual complaint.

The Commission continues to monitor the matter with a view to understanding if the potential underlying issue has been rectified as well.

G. Issuance of residence documents under the Withdrawal Agreement in the correct format to children under the age of 12

Since 2020, the Commission had exchanges with one Member State regarding the format of the residence documents issued to Withdrawal Agreement beneficiaries under the age of 12 and the need to issue such documents systematically.

Following legislative amendments that took place in 2023, the Member State concerned confirmed to the Commission in 2024 that Withdrawal Agreement beneficiaries under the age of 12 are now being issued with a residence document in the correct format. The type of document previously issued to Withdrawal Agreement beneficiaries under the age of 12 will be phased out.

H. Temporary protection during appeal proceedings before the national supreme administrative court

In 2024, the Commission had exchanges with one Member State regarding the issue of providing for temporary protection, in line with Article 18(3) of the Withdrawal Agreement, in a situation where an appeal against a negative decision on Withdrawal Agreement beneficiary status is pending before the national supreme administrative court.

The exchanges have continued into 2025.

I. Application for Withdrawal Agreement beneficiary status by minors and documents to be issued to them

Since 2020, the Commission has had exchanges, including meetings, with one Member State regarding the fact that it does not allow United Kingdom nationals and their family members under the age of 18, or exceptionally 16, to apply for Withdrawal Agreement beneficiary status and does therefore also not issue those minors with Withdrawal Agreement residence documents.

In 2024, the Commission sent a political letter to the Member State concerned.

The Commission continues to monitor the implementation of the Withdrawal Agreement on this issue.

J. Health information requested in application forms

Since 2022, following the receipt of a complaint, the Commission had exchanges with one Member State regarding health information requested in Withdrawal Agreement application forms.

In 2024, the Member State concerned informed the Commission that the online information was changed to state that there was no need to make any health statements in Withdrawal Agreement applications.

The Member State also stated that it envisaged modifying the relevant legal provisions and application forms in 2025.

The Commission continues to monitor this matter.

Conclusion

This result-oriented approach meant that the Commission did not have to initiate any procedure under Article 258 of the Treaty on the Functioning of the European Union or even resort to litigation before the Court of Justice of the European Union in 2024 with regard to any EU Member State.

On the other hand, the Commission referred the United Kingdom to the Court of Justice of the European Union on 20 December 2024 in case C-892/24, *Commission v United Kingdom*.

In this case, the Commission asked the Court of Justice to declare that the United Kingdom has failed to fulfil its obligations under Articles 45 and 49 of the Treaty on the Functioning of the European Union as well as under Articles 3(2)(a), 5, 6, 7(3)(b) and (c), 15(3), 23 and 35 of Directive 2004/38/EC.

The Commission maintains that national rules which governed the conditions of entry and residence of mobile EU citizens, that were in force in the United Kingdom up to and during the transition period established by the Withdrawal Agreement, have had – and may continue to have – a negative impact on the rights of EU citizens and their family members.

The claims cover the conditions under which dependent family members of EU citizens may enjoy rights in the United Kingdom; the conditions under which formerly economically active mobile EU citizens are able to retain their status as workers or self-employed persons; and the approach to defining and sanctioning conduct as an abuse of rights.

The case is currently pending before the Court of Justice.

External dimension

In 2024, the Commission did not participate in any pending cases before the courts and tribunals of the United Kingdom, in accordance with Article 162 of the Withdrawal Agreement, based on which the Commission may submit written observations in pending cases where the interpretation of the Withdrawal Agreement is concerned.

Work in the Joint Committee and the Specialised Committee on Citizens' Rights continued throughout 2024 regarding the implementation of [the UK High Court 2022 judgment](#) in the case brought by the IMA, in which the Commission participated under Article 162 of the Withdrawal Agreement⁷.

[The judgment](#) confirmed the Commission's interpretation concerning the question whether the United Kingdom's pre-settled status (corresponding to the notion of the non-permanent right of residence under the Withdrawal Agreement) can be lost if the EU citizens concerned do not apply for settled status (a status meant to correspond to the permanent right of residence) before their pre-settled statuses expire and whether the right of permanent residence is acquired automatically or can only be granted upon application.

⁷ Judgement of the High Court of 21 December 2022 in case *The Independent Monitoring Authority for The Citizens' Rights Agreements vs Secretary of State for the Home Department*, CO/4193/2021.

No request to establish an arbitration panel under Title III of Part Six of the Withdrawal Agreement was made in the reporting period.

b. Measures taken at EU Member States level

Responses from Member States are included in a document annexed to this report of which the report takes note.

Additional statistical data on coordination of social security systems are available at [the Commission's website on network of experts on statistics](#).

4. Complaints

The Withdrawal Agreement is enforced in the same way as any other instrument of EU law, both by direct action taken by individuals who believe that the national authorities of an EU Member State have not respected the rights they enjoy under the Withdrawal Agreement and by action taken by the Commission.

Information acquired through individual complaints helped to complete information about the implementation of the Withdrawal Agreement and informed measures taken by the Commission.

The most effective approach for UK beneficiaries to enforce their rights directly is to seek redress at national level, given that public authorities and national courts have the main responsibility for the correct application of the Withdrawal Agreement and can directly resolve individual cases.

In addition to administrative redress procedures, UK beneficiaries can make an appeal and ask the relevant domestic court to examine their case. The court will examine the legality of the contested national decision (or that no decision was at all made) and whether the decision was correct and proportionate, by looking into the facts and circumstances on which the decision is based. If the court finds a problem with national law, it can, in many instances, apply the provisions of the Withdrawal Agreement directly. Only national courts have the power, where appropriate, to order national authorities to compensate UK beneficiaries for losses they have suffered due to a breach of the Withdrawal Agreement.

UK beneficiaries under the Withdrawal Agreement have access to the same remedies as EU citizens have for potential breaches of EU law.

In addition to any action UK beneficiaries may be pursuing at national level, they can submit a petition to the European Parliament or write to the Commission to file a complaint about any measure (law, regulation or administrative action), the absence of a measure or a practice by an EU Member State that they think breaches the Withdrawal Agreement.

The Commission's complaints handling policy is based on [Communication on EU law: Better results through better application](#). The 2022 Communication [Enforcing EU law for a Europe that delivers](#) presents the tools that the Commission uses to ensure that EU law is properly applied in all cases to meet its main objective: that people and businesses benefit from the commonly agreed rules throughout the EU, as quickly as possible.

The Commission treats these complaints as any other complaints related to EU law. More information on how the Commission handles complaints is available [here](#). Complainants must use the standard [online complaint form](#) or download it from [the Commission's website](#), fill it in and submit by e-mail or by post.

The Commission can take up the complaint only if it is about a breach of the Withdrawal Agreement by authorities in an EU Member State. It cannot follow up matters that involve only private individuals or bodies, and that do not involve public authorities. UK beneficiaries who find it difficult to find out which provision of the Withdrawal Agreement they think has been breached and what they can do about it can address queries to [the Your Europe Advice service](#).

The Commission's action in response to a complaint is unlikely to directly resolve the complainant's personal situation as it is focused on ensuring that the laws of the EU Member State in question are brought fully in line with the Withdrawal Agreement and are correctly applied. In order to directly resolve their personal situation, or be awarded compensation, complainants should take action before the national authorities in the Member State concerned.

In some cases, they can also submit their case to [SOLVIT](#), a network of centres based in national administrations that work together to resolve problems related to the incorrect application of EU law in a cross-border context via cooperation.

As the United Kingdom is no longer part of the SOLVIT network, SOLVIT cannot offer its assistance in matters that require cooperation or intervention of some parts of the United Kingdom administration.

However, SOLVIT centres may offer some assistance to UK beneficiaries if their problems have a cross-border dimension and can be potentially solved by the administration of an EU Member State without any involvement of or contact with the United Kingdom administration. For example, SOLVIT could help UK beneficiaries residing in an EU Member State and experiencing problems in a cross-border context with their residence rights or social security rights there. SOLVIT's intervention is entirely dependent on the decision of each SOLVIT centre.

In 2024, SOLVIT recorded 94 United Kingdom related cases. These cases concerned problems of UK beneficiaries in exercising their Withdrawal Agreement rights in EU Member States, but also problems EU citizens experienced in EU Member States in relation to having exercised their single market rights in the United Kingdom.

Of these cases, SOLVIT had to reject 51% (48 cases) as a resolution would have required the intervention of the United Kingdom administration.

Out of the remaining cases that did not require any intervention of the United Kingdom administration, 39 cases were resolved. Of these, 24 cases concerned Chapter 1 (*residence*), 1 case concerned Chapter 3 (*professional qualifications*), 13 cases concerned Title III (*Coordination of social security systems*) and 1 case concerned other issues. Seven cases remained unresolved.

In addition to the above, the Commission and the UK Government agreed on a grace period from 1 October 2021 until 31 May 2024, on the basis of which, the Commission ensured

access to the European Professional Card's (EPC) modules of the Internal Market Information System (IMI) for each UK authority involved in the processing of the remaining pending EPC applications.

Statistical aspects

In the reporting period, the Commission registered 24 complaints falling under Communication C(2016)8600, which related to the application of the Withdrawal Agreement by authorities in an EU Member State.

The number and nature of complaints received is in Table 1.

Table 1 – Complaints received in 2024

Area	Overall number	Topic	Number	Subtopic	Number
Chapter 1 of Title II	14	Rights related to residence, residence documents	13	Refusal	5
				Handling of applications	6
				Equal treatment - housing	2
		Travel and border crossing	1	Refusal to issue the visa to family members	1
Chapter 2 of Title II	3	Equal treatment	3	Access to a profession	1
				Taxation	2
Title III	7	Healthcare	5	EHIC, sickness benefits, healthcare, medicine	5
		Other	2	Issuance of certificates, aggregation of periods	2

No complaint has been registered on Chapter 3 (*Professional qualification*) of Title II of Part Two in the reporting year.

Handling of complaints received by the Commission

By June 2025, out of the 24 above-mentioned complaints, 21 complaints have already been closed.

Out of those complaints:

- 6 complaints were considered as founded but were not pursued further by the Commission⁸;
- 3 complaints were considered as founded but were solved by other means (*change of regional legislation and change of interpretation by national authorities*); and
- 12 complaints were considered as unfounded, given that no violation of EU law was identified in the Commission's assessment.

⁸ Unless they raise a question of wider principle to be assessed in the general interest, such are complaints on individual cases of incorrect application of EU law where there are insufficient indications of a general practice, of a problem of compliance of national legislation with EU law or of a systemic failure to comply with EU law; and there are appropriate redress mechanisms at the national/EU level.

Three complaints made in 2024 were under consideration by the Commission that is seeking to resolve them as soon as possible.

Your Europe Advice

In 2024, Your Europe Advice received inquiries from 1418 United Kingdom nationals.

Of 960 eligible inquiries, 69% concerned Chapter 1 of Title II (*39% related to residence, 30% related to entry conditions*), 4% concerned Chapter 2 of Title II (*workers and self-employed persons*), 0.1% of inquiries cases concerned Chapter 3 (*professional qualifications*), 16% of inquiries concerned Title III (*Coordination of social security systems*) and other inquiries concerned other issues, such as consumer rights or free movement of goods.

The top three issues concerning residence rights were linked to:

- rights of family members;
- residence application procedures; and
- visa requirements, visa exemption and passport validity.

The top three issues concerning workers and self-employed persons were linked to:

- access to employment;
- cross-border work and posting of workers; and
- equal treatment in employment and working conditions.

The top three issues concerning coordination of social security schemes were linked to:

- old age pensions and retirement benefits;
- access to health care, sickness or maternity benefits; and
- determination of the applicable legislation and administrative coordination between Member States.