On 1st March 2012, COFACE responded to the Green Paper on the right to family reunification of third country nationals living in the European Union (Directive 2003/86/EC) highlighting the family dimension and the families perspective, bringing first hand information from its member organisations and recalling key principles for the effective implementation of the right to family reunification.

In its response, COFACE stresses that the right to family life is recognised in International and European Human Rights Instruments and therefore, families should be supported and facilitated in the fulfilment of such a right, with no discrimination of individuals or of family forms.

The best interest of the child, as recognised by several international instruments and EU documents, has to be given priority when considering family reunification applications.

Families’ well-being and the right to family life should also be supported accordingly and an individual assessment must be ensured for each application.

The gender dimension of family reunification should not be underestimated. Women should be supported, in order to foster their integration, among others, in employment, and reduce dependency from the sponsor.

Particular attention should be given to the presence of family members in need of care, with disabilities and/or dependency (including older family members and parents of sponsors).

COFACE stands for the right to family reunification and therefore rejects mandatory pre-entry measures that could prevent or discriminate some families from reunification (low income, low educated, disadvantaged groups...).
In particular, COFACE believes that:

- **Criteria for housing, income and other material conditions** should be further investigated, also from a human rights approach, since they have not proven to serve the purpose of integration but, instead, can be barriers to family reunification.

- **Language skills** are developed more effectively and fruitfully within the respective language-speaking environment. Imposing language requirements before the entry in the host country raises a number of concerns (accessibility and cost of course/test, level and adequateness to the user profile) and in particular can be perceived as a defence mechanism against people of certain backgrounds.

- **Administrative fees** should be limited in order to make family reunification accessible for all families.

- **DNA tests** should be the exception and not the rule. Moreover, three elements should be considered: 1. the necessity of the test and individual assessment, to avoid being too invasive in privacy and personal life; 2. the cost and length of procedure; 3. the use and storage of personal data.

- **The longer the separation of its members, the harder family life becomes. Long separation** can influence negatively relationships between family members and may affect children. Moreover, the longer the delay in reunification, the greater the difficulty of integration in the receiving country. Therefore, delays in procedures should be reduced and waiting periods eliminated.

- **The problem of forced marriage** cannot only be effectively addressed by restrictive regulations, but also through sustained educational measures and counselling support. The issue should indeed be approached as a human rights violation and not as an attempt to fraud.

COFACE calls for a harmonisation of standards in all EU Member States, including those who opted-out, and their real and effective implementation, as a fundamental step to a growth and inclusive society.

Family reunification is a vector of social cohesion and integration, therefore, no family should be discriminated and prevented from such right.

Please find more information on this question on our website:


---

**What is COFACE?** The Confederation of Family Organisations in the European Union (COFACE) is a pluralistic organisation, at the heart of civil society, which aims to promote family policy, solidarity between generations and the interests of children within the legislation, programmes and initiatives of the European Union ("Family mainstreaming").

---

Contact: Tel: +32 2 511 41 79 | E-mail: secretariat@coface-eu.org | Website: [www.coface-eu.org](http://www.coface-eu.org)

COFACE is supported by the European Union Programme for Employment and Social Solidarity - PROGRESS (2007-2013): [http://ec.europa.eu/progress](http://ec.europa.eu/progress). This document is produced with the support of the European Commission but does not necessarily express its views.