

To: Maroš Šefčovič, European Commissioner for Trade and Economic Security

16 September 2025

Dear Mr Šefčovič,

We write as civil society representatives of 6 million EU citizens and their family members living in the UK, and 1.2 million British citizens and their family members living in the EU27, all of whom exercised free movement rights before December 2020.

Brexit was a unique political and legal event in the history of the UK and EU member states. It bears repeating that very few EU citizens in the UK could vote and almost 60% of UK citizens living in the EU27 were also disenfranchised in the referendum. Among the 40% who could vote, 95% of UK citizen voters living in the EU27 voted to remain. This was a decision about us taken without us.

You recognized this when both our organizations wrote to you and Michael Gove as co-chairs of the Joint Committee established under the Withdrawal Agreement in 2020 asking for the opportunity to present at meetings of the Specialized Committee on Citizens' Rights. You agreed and we have been attending meetings since 2021, bringing the grassroots community experiences of the people most affected by Brexit to the attention of the EC, UK and Member States. We have found our interactions with all parties in the SCCR invaluable and appreciate the solutions identified for sometimes intractable problems following our appearances before it.

However, it is now over five years since the UK left the EU but Brexit – as you well know – is still not done. Because Brexit was a unique historical and legal moment in EU and UK history it has thrown up numerous legal and political issues that continue to impact all the communities we support and represent. There are still significant problems with implementation of the citizens' rights part of the WA for EU citizens living in the UK, and for UK citizens living in several Member States.

For British citizens in the EU27 these implementation breaches have resulted in a range of consequences, including loss of access to housing and jobs and the break-up of families arising out of orders to leave, travel bans for the Schengen zone, and a denial of WA and Charter of Fundamental rights, contrary to what was promised by then UK Prime Minister Theresa May and EU chief negotiator, Michel Barnier, in early 2017. Problematic countries continue to include constitutive Member States Sweden and Malta and, because of the size of the UK populations and the introduction of EES in October, declaratory countries such as Spain and Germany, but also Portugal due to ongoing general issues within the immigration system.

For EU citizens in the UK, initial fears that a large number would fall through the cracks due to the UK's historic lack of any registration scheme have proved well founded. Since the June 2021 deadline, there have been 254,000 grants of status to late applicants. There continue to be 7,000 grants of status to late applicants every month. These are increasingly complex applications and are unlikely to succeed without support and legal representation. Over 140,000 citizens are still waiting for a decision, a quarter of those for longer than a year, without travel rights while they wait. For those 6 million who do have status, we see a continuing stream of difficulties accessing rights due to the UK's implementation of a digital-only status - resulting in loss of jobs, housing and denial of boarding - invariably affecting the most vulnerable and those already subject to intersectional discrimination.

These examples illustrate the fact that ongoing support is still needed for civil society organizations working in the UK and in the EU to support Withdrawal Agreement beneficiaries and their family members. The cases our organizations encounter are increasingly complex and time consuming yet our financial and human resources to deal with them are limited and dwindling. British in Europe currently benefits from funding under the CERV programme to work on WA implementation and its interaction with the [Charter of Fundamental Rights](#).¹ We are very grateful for this funding, but our project ends on 31.10.2025. After that we will be completely unfunded volunteers once more. The UK government (the FCDO and Cabinet Office) tells us our case identification and advice work is important to them, but it is not important enough for them to fund us to continue.

Equally for EU citizens in the UK, ongoing support is essential. The UK government's funding to support vulnerable citizens applying for status is in its final year and has reduced sharply. Over half the organisations that were funded to provide complex advice, precisely the type of advice most needed, no longer receive any funding. the3million was pleased to receive EU funding to deliver its Common Ground project, building bridges and raising awareness of citizens' rights among civil society organisations. We remain immensely grateful for the ongoing substantial support provided by the EU Delegation in the UK and the expert legal policy advice by Seraphus, made possible by EU funding. This enables us to widely disseminate ongoing changes to the EU Settlement Scheme, provide an in-depth knowledgebase, and to support and signpost vulnerable citizens.

It was acknowledged with the adoption of the 2021 [Brexit adjustment reserve](#) that there would be an impact on communities and businesses from Brexit, yet none of the available €5.47 billion in funding was dedicated to supporting the 7 million citizens most affected or the civil society organizations in the UK and EU trying to help them.² Article 1 (h) facilitates Member States to support the reintegration of Union citizens who left the UK as a result of Brexit back into the EU, but not UK citizens living in the EU27 or EU citizens who chose or who had little choice but to stay in the UK.

Brexit is not going away and neither is its impact on our communities. We are told our work is needed and valued but it is insufficiently funded. If we are to continue to bring cases to the attention of the EC so that it can carry out its evaluation and monitoring function of the WA effectively, we need more support. Accordingly, we are writing to you to ask for a dedicated fund to facilitate the work carried out by civil society in the UK and the EU to support WA beneficiaries on both sides of the Channel. This would allow us to continue to collect cases and bring them to the attention of the Commission Services, including the EU delegations to the UK, the UK government, including the Independent Monitoring Authority, and Member States.

We appreciate the hybrid nature of our request and the potential straitjackets of funding streams determined on the basis of EU and non-EU based activities but our strength as organizations comes from our shared work and objectives since 2017. As volunteers we took on the challenges posed by Brexit to protect citizens' rights. We are confident that where there is a will there will be a way and that as a pragmatic and solutions-focused Commissioner with responsibility for the EU UK relationship you can make it happen.

The EU's engagement with civil society organisations in the UK following Brexit has been one of the most meaningful examples of external action in support of EU citizens abroad. This work, including supporting rights monitoring and community outreach, demonstrates what is possible when the EU takes an active role in safeguarding its citizens outside its borders. The experience continues to generate valuable lessons in rights protections and the importance of innovative close partnerships, which should be taken forward and reflected in the upcoming MFF. For example, while the scope of the EU's Gender Equality Strategy is global, others such

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:12012P/TXT>

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:4555799>

as the Anti-Racism Strategy remain limited to the EU's internal territory, creating a significant gap in policy and funding that urgently needs to be addressed.

We would also like to acknowledge that all our grassroots hard work can only be effective if we have engaged interlocutors in the Commission services who can take up complaints on behalf of UK citizens in the EU and EU citizens in the UK. In this respect, we would like to take this opportunity to highlight the support we receive from the citizens' rights and WA teams in the EC Secretariat-General, DG JUST and the Delegation of the European Union to the UK. If our work is to have a future, these teams must have one as well.

Finally, we note the publication on 16 July 2025 the EC proposal on the 2028-2034 MFF. We look forward to receiving more information from the Commission Services about their vision and proposed level of support via the MFF for citizen beneficiaries of the Withdrawal Agreement and the overall EU UK reset over the coming weeks and months. We will, of course, also be taking this up with the Member States and European Parliament.

Your sincerely,

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Monique Hawkins, Head of Policy and Advocacy, the3million