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Potential Effects and Concerns of the Agreement Between Italy and Albania on Managing Migratory Flows

Rrezart Bushati[1], **Emanuela Furramani**[2*]

[1]Albanian University – Tirana, Albania ✉ rrezartbushati@yahoo.it
[2]University "Luigj Gurakuqi" – Shkoder, Albania ✉ emanuela_f84@yahoo.it

Abstract: *The recent Memorandum of Understanding concluded between Italy and Albania for cooperation in the migration field has caused strong criticism. This agreement has raised many doubts regarding its compliance with the Albanian Constitution, specifically concerning the procedure required for concluding international agreements relating to the concession of the territory to foreign powers and the protection of human rights. Recently, the Albanian Constitutional Court decided that the Protocol does not violate the Constitution. This study aims to highlight the critical issues related to fundamental rights protection, particularly regarding the issue of which state will be responsible for human rights protection according to the ECHR. Another profile to consider is the determination of Albania as a safe place, considering that the agreement aims to transfer people rescued in international waters by Italian military vessels into Albanian territory.*

Keywords: *Migration; Place of Safety; Search and Rescue; Human Rights; Albanian Constitution*

INTRODUCTION

The migratory flows have increased steadily in recent decades, making it difficult for European countries to manage. One of the strategies designed by some European states to discourage migrant flows is the stipulation of agreements with third countries for transferring migrants rescued at sea, pending the evaluation of the asylum request. The recent Memorandum of Understanding (MoU) concluded between the Government of the Republic of Italy and the Council of Ministers of the Republic of Albania regarding the cooperation in the migration field raised significant political and legal discussions (Masera 2023; Testi 2023; Albanian Constitutional Court, Press Release 2023). The constitutional legitimacy of this agreement has been presented due to the numerous concerns it has created regarding its compatibility with the Albanian Constitution.

One of the most discussed and contested issues in Albanian doctrine is Article 3 of the agreement, which establishes that the Italian State will use part of the Albanian territory to construct structures suitable for hosting migrants in Shëngjin and Gjadër. Another widely debated issue is the procedure for concluding international agreements. In this context, members of Parliament have alleged a lack of adherence to the negotiation and signing procedures, citing the Protocol as an example of an agreement that necessitates the President of the Republic's authorization following Article 121 (1) (a) and (b) of the Constitution due to its territoriality and fundamental rights implications (Alb. Const. Court, press release 2023).

In a strongly contested final ruling on the subject, the Albanian Constitutional Court declared that the deal did not violate the Albanian Constitution. In the opinion of the Court, the agreement does not exclude Albanian jurisdiction in these areas of the territory (Alb. Const. Court, Decision No. 2, 29 January 2024, para. 49, 63). There are also no limitations on fundamental human rights under the agreement (Alb. Const. Court, Decision No. 2, 29 January 2024, para. 64).

The agreement concluded between Italy and Albania must be analyzed from different perspectives. If we refer to Albania, the agreement must be evaluated in light of the concession of part of the territory of the Albanian state to another state, even though the Albanian Constitutional Court, in its contradictory decision, considered that the agreement does not exclude the Albanian jurisdiction (Alb. Const. Court, Decision No. 2, 29 January 2024).

Differently, as regards Italy, the issue is more complex, considering that the agreement must be evaluated from the point of view of respect for human rights (Masera 2023), in particular concerning the principle of non-refoulement and compliance with internal, international, and European Union legislation (Rijtano 2023). Another profile to consider is the determination of the PoS (place of safety) in the specific case, as the people transferred to these centers will be those rescued in international waters by Italian military vessels.

LITERATURE REVIEW

There are many international conventions aimed at protecting the rights of migrants, among which the SAR Convention adopted in November 1974 and the International Convention for the Safety of Life at Sea (SOLAS), which refer to search and rescue operations at sea and ensure assistance to persons in distress at sea (Cottone 2016, 101). States that ratify the SAR Convention are specifically required to rescue and assist people in distress at sea. This duty includes providing first aid and other care, as well as disembarking shipwrecked people in a safe place within a reasonable time (Camarda 2007; Antonucci, Papanicolopulu, and Scovvazzi 2016, 67–68; Paleologo 2018, 222; Cass. Pen., sez. III, n. 6626/2020, Rackete case).

Other international and European instruments prohibit the repatriation of asylum seekers to their country of origin or to a third country where their life or physical or mental integrity is in danger (McEldowney 2023; Salamone 2011, 108–127; Antonucci, Papanicolopulu and Scovazzi 2016, 68–69; Mussi 2023, 105), including the 1951 Geneva Convention on the Status of Refugees, which obliges States parties to the Convention to refrain from transferring asylum seekers to nations where their life or physical integrity could be in danger (Paleologo 2018, 218). This prohibition is known as the principle of non-refoulement.

The impact of the agreement between Italy and Albania on the fundamental rights of immigrants has been the subject of debate in both doctrine and jurisprudence (Gentilucci 2023; Occhipinti, 2023; Rijtano 2023; Masera 2023; Testi 2023; Alb. Const. Court, press release 2023). The deal is frequently compared with the one reached by the UK and Rwanda, which has been declared by the British Supreme Court in violation of relevant international agreements (McEldowney 2023; Casciani and Seddon 2023). This British Supreme Court stated that since Rwanda is not considered a safe country, immigrants may be the target of torture or other cruel treatment (AAA (Syria) and Ors, R. v Secretary of State for the Home Department [2023] UKSC

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42, 15 November 2023; McEldowney 2023) or being returned to their country of origin, which is against international law (McEldowney 2023).

Nevertheless, the two agreements consist of different elements, considering that the Protocol between Italy and Albania provides that Italy has the task of evaluating and managing asylum requests presented by asylum seekers (Masera 2023), differently from the agreement concluded between the United Kingdom and Rwanda, according to which the Rwandan authorities have the task of evaluating asylum requests.

METHODOLOGY

The primary purpose of this study is to analyze the different doctrinal and jurisprudential perspectives related to the Memorandum of Understanding (MoU) that Albania and Italy reached regarding cooperation in the migration field. There are three sections to this elaboration: The first systematically examines the provisions of the agreement and the orientation of the Albanian Constitutional Court regarding the latter. The second conducts an in-depth examination of international regulations for determining the search and rescue zones and the principle of non-refoulement of asylum seekers. Meanwhile, the third part concerns the comparison between the agreement concluded between Italy and Albania and the agreement reached between the United Kingdom and Rwanda.

This study uses qualitative research methods to analyze the regulatory framework and jurisprudential orientation on the provisions of the agreement between Italy and Albania and the possible implications of its implementation.

ITALY-ALBANIA PROTOCOL ON MIGRANTS: CRITICAL ISSUES

The Memorandum of Understanding (MoU) concluded on 6 November 2023 in Rome between the Council of Ministers of the Republic of Albania and the Government of the Republic of Italy relating to collaboration in migration matters has provoked great political and legal debates (Gentilucci 2023; Occhipinti, 2023; Rijtano 2023; Masera 2023; Testi 2023; Alb. Const. Court, Press Release 2023).

In particular, the MoU is aimed at managing migratory flows directed to the Italian coasts, providing for the construction of reception centers in Albanian territory for migrants rescued in non-European waters (Gentilucci 2023; Occhipinti 2023) by the competent Italian authorities. The Protocol provides that the migrants will remain in the centers located in Albanian territory for a maximum period of 18 months for the sole purpose of carrying out the border or repatriation procedures required by Italian and European legislation and for the time strictly necessary for them (Article 4.3 of the Protocol) until the evaluation of the asylum request by the Italian state (Liboreiro and Genovese 2023). Based on the agreement, the reception centers will be managed by Italy, while Albania will only take care of their external surveillance (Article 6, para. 2 of the Protocol). Migrants are allowed to leave the camp only when necessary—for example, when medical assistance is needed—and even then, only if accompanied by the relevant authorities. According to Article 6, paragraph 6, the Albanian authorities must turn over any migrants who leave the camp without permission to the Italian

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authorities. The Italian State will bear all expenses spent by the Albanian authorities during this operation.

One of the issues most discussed by Albanian doctrine, also considered a cause of constitutional legitimacy, is Article 3, which provides that the Italian state will use part of the Albanian territory to construct structures suitable for hosting migrants in Shëngjin and Gjadër.

Article 4 of the MoU establishes the maximum capacity of the two reception centers within a limit of 3 thousand migrants. The second paragraph provides that the centers managed by the Italian State will host migrants while awaiting the assessment of their asylum request by the Italian State authorities. The jurisdiction over asylum applications has been assigned to the territorial commission for the recognition of international protection in Rome, along with the sections to be precisely established. Concerning appeals, the jurisdiction has been assigned to the Immigration Section of the Court of Rome and the Judges of the Peace of the Capital. Twenty courtrooms located in Albania will host the electronic civil hearings (Spagnolo 2024).

Italy is not the only European state that has tried to resort to the conclusion of this type of agreement in an attempt to cope with increasingly pressing migratory flows. This possibility has been considered by the United Kingdom, and other states, such as Austria and Denmark, are also evaluating this option.

Critical aspects regarding the impact that the implementation of this agreement can have on respecting the human rights of migrants were also raised by the Commissioner for Human Rights of the Council of Europe, Dunja Mijatović, who stated that: "The Memorandum of Understanding (MoU) between Italy and Albania on disembarkation and the processing of asylum applications, concluded last week, raises several human rights concerns and adds to a worrying European trend towards the externalization of asylum responsibilities" (Council of Europe 2023).

On December 2023, 30 deputies of the opposition party appealed to the Constitutional Court, alleging that the agreement between Italy and Albania violates the Albanian Constitution. The Constitutional Court, as a precaution, suspended the ratification of the MoU by Parliament until the final decision on the matter (based on Article 52, point 3, of Law No. 8577/2000, the hearing of the case automatically suspends the ratification procedures in the Assembly of the Cooperation Protocol until the final decision of the Constitutional Court). The appeal claimed the violation of the constitutional rules regarding the procedure for concluding international agreements, considering that this Protocol requires the authorization of the President of the Republic of Albania, as it implies both a partial transfer of sovereignty over some parts of Albanian territory and the protection of fundamental rights, according to Article 121, para.1, letter a and b of the Albanian Constitution (Alb. Const. Court, Press Release 2023).

The Albanian Constitutional Court ruled on the issue on 29 January 2024, stating that the agreement does not violate the Albanian Constitution, indicating that we are not dealing with the transfer of Albanian territory and that the recognition of Italian jurisdiction in these parts of the territory does not exclude Albanian jurisdiction (Alb. Const. Court, Decision No. 2, dated 29 January 2024, para. 49, 63). The Court stated that the agreement does not impose restrictions on fundamental human rights (Alb. Const. Court, Decision No. 2, 29 January 2024, para. 64). The decision is highly debated because, as mentioned above, the Albanian authorities have no jurisdiction in the centers. The Italian authorities will be responsible for the recognition or refusal of international protection for asylum seekers, and they will be responsible for the repatriation

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procedures of migrants coming from safe third countries who have not obtained the status of asylum seekers. Albania and Italy are parties to the Geneva Convention on the Status of Refugees and the European Convention on Human Rights. Still, it is unclear how the Constitutional Court concluded that Albanian jurisdiction is not excluded. The concerns regarding the constitutional decision relate to two significant facts. In the first place, according to the Protocol, Albania has no jurisdiction within the centers. In the second place, the Protocol provides that the entire procedure regarding the recognition or refusal of refugee status, or the repatriation procedures, is the Italian authority's responsibility. The Albanian authorities are responsible only for external security in the centers.

Although the authorities have declared that the reception centers will host migrants rescued in non-European waters "exclusively with the means of the competent Italian authorities" (Article 4.4 of the Protocol) or that the agreement includes only male adults, excluding women, minors, and vulnerable people (Liboreiro and Genovese 2023; Masera 2023; Testi 2023, 2), who will be transferred to centers within Italian territory, it must be seen whether these statements merely fall within the framework of declarations. Thus, it is pertinent to discuss the opposition party's proposal in Italy to incorporate a clause that would exempt vulnerable individuals from the Protocol's applicability in the ratification law's text; however, the majority party rejected this idea. On 24 January 2024, the Chamber of Deputies approved the ratification law. Consequently, one of the criticisms raised by Italian jurists is that the Protocol's text is poorly detailed and vague.

THE RULES FOR DETERMINING SAR ZONE ACCORDING TO INTERNATIONAL LAW

One of the obligations under international law is to provide assistance at sea (Oxman 1997, 399–415; Pallis 2002, 329–324) to anyone in distress. International law imposes on every state the obligation to require ship commanders, carrying their flag, to rescue people in distress at sea (Attard 2020; Carta 2021, 1181; Salamone 2011, 121–122; Caffio 2020, 148; Rossi 2019, 48–52; Mussi 2023). This obligation requires two conditions: first, it must not put the ship or the people on board in danger; second, it must have received information about the existence of people in distress at sea (Mussi 2023, 47; Convention SOLAS 1974, chapter V, regulation 33; Salamone 2011, 127, 131; Geneva II, 12, 1; UNCLOS 98, 1; Paleologo 2018, 219). The commander who intervenes to rescue people in distress at sea has other obligations, such as respecting the human dignity of the people rescued and taking them to a safe place (PoS) (Salamone 2011, 123; Mussi 2023, 48).

Regarding the obligation to rescue at sea, in addition to what was mentioned above, a series of international conventions must also be taken into consideration, including the UNCLOS adopted in 1982 and the International Convention on Maritime Search and Rescue (SAR Convention) signed in Hamburg on 20 April 1979, which is considered a fundamental tool as it provides for the establishment of an effective search and rescue service at sea (Cottone 2016, 99 et seq; Camarda 2007; Magnosi 2018, 175–177; Salamone 2011, 121; Bernardi 2018, 137). The SAR Convention provides that coastal states establish SAR (search and rescue) zones through regional agreements without prejudice to the legal regime of maritime spaces (Salamone 2011, 128–130).

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The authorities of the coastal state, which is responsible for the SAR zone, are required in that zone, when they become aware of people in distress, to intervene immediately without considering their nationality or legal status (Salamone 2011, 128; Papastavridis 2015, 269 et seq.; Papanicolopulu I. 2017, 9–17; De Vittor and Starita 2018, 77 et seq.).

In this sense, the Convention, in Chapter 2.1.10, obliges state parties to: "(...) ensure that assistance be provided to any person in distress at sea. They shall do so regardless of the nationality or status of such a person or the circumstances in which that person is found" and in Chapter 1.3.2 it considers "Rescue: An operation to retrieve persons in distress, provide for their initial medical or other needs, and deliver them to a place of safety".

The SAR Convention, together with the International Convention for the Safety of Life at Sea (SOLAS), adopted in November 1974, subsequently amended, aiming to preserve the integrity, from the point of view of effectiveness, of search and rescue services (Cottone 2016, 101), and at the same time to ensure assistance to people in distress at sea, minimizing the inconveniences for the merchant ship providing assistance and with a minimum course deviation (Cottone 2016, 101).

As regards the Mediterranean, Italy was the first coastal state to have delimited its own SAR area of competence through a MoU with the other bordering or contiguous states, concluded with the Ancona Conference in 2000 and with Algeria in 2012 (Caffio 2016, 142; Caffio 2020, 150).

Attempts to delimit the SAR zone had already begun at the Conference of the International Maritime Organization held in Valencia in 1997, where a provisional general agreement was established on the subdivision of the SAR zones in the Mediterranean, divided in a consensual way (Turco Bulgherini 2018, 133).

The situation of the Maltese SAR zone is singular, declared unilaterally by the latter during the Valencia Conference. The case of Malta is very controversial as this state has claimed a vast SAR zone that overlaps in the northern part with the Italian SAR zone (Salamone 2011, 128–129; Leanza 1999, 267 et seq.; Turco Bulgherini 2018, 144), even to the point of covering part of the territorial waters of Lampedusa and Lampione (Caffio 2016, 138–142; Caffio 2020, 151).

The SAR Convention, as amended, places a specific duty on the adhering states to rescue and assist individuals in distress at sea. This duty includes the provision of initial medical attention and other care, as well as the obligation to disembark shipwrecked individuals in a safe place (Camarda 2007; Antonucci, Papanicolopulu, and Scovvazzi 2016, 67–68; Paleologo 2018, 222; Cass. Pen., section III, n. 6626/2020, Rackete case) within a reasonable time. Part of the doctrine highlights the fact that the Convention does not define whether the safe place can be another state different from the one competent for the SAR area (Comenale Pinto 2011, 613; Turco Bulgherini 2018, 143). As regards the identification of the safe place, the practice has shown that it is not a trivial matter, as there have been cases of refusal by the nearest state or the state responsible for the SAR zone to host the people rescued at sea (Both Italy and Albania are signatories to the agreement, Albania through Law No. 9056, dated 24 April 2003, on the "Accession of the Republic of Albania to the International Convention on Search and Rescue at Sea" and Italy through Law No. 147, dated 3 April 1989 regarding "Accession to the International Convention on Maritime Search and Rescue, with Annex, adopted in Hamburg on 27 April 1979, and its implementation" SAR).

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The IMO has intervened on this issue several times. Crucial is "IMO Circular MSC/896/1998", which contains Interim Measures for Combating Unsafe Practices Associated with the Trafficking or Transport of Migrants by Sea and operational criteria for combating the trafficking of migrants by sea. This document highlights the close relationship between migratory flows and the ship, underscoring the problems related to navigation safety, search, and rescue at sea. This Circular establishes that the state, which carries out checks on vessels suspected of transporting illegal migrants, must intervene in such a way as not to endanger the safety of people on board boats deemed unsafe by the SOLAS Convention (Turco Bulgherini 2008, 1859).

In 2004, the IMO adopted Maritime Safety Committee (MSC) Resolution 167, containing guidelines on the treatment of people rescued at sea (Salamone 2011, 123–125; Turco Bulgherini 2018, 142; Caffio 2020, 155). According to the guidelines, the responsibility to provide a safe place or to ensure it falls on the state responsible for the SAR area where the rescue is carried out (Salamone 2011, 124 et seq.). In addition to determining the state's responsibility, the guidelines define the meaning of a place of safety. In this regard, paragraph 1.3.2 states that the "place of safety" is where rescue operations are deemed to have concluded, where survivors' safety and lives are no longer in danger, and where transportation to the nearest or ultimate destination can be organized (Salamone 2011, 124; Ciliberto 2022, 734).

It can be seen from the above that the SAR Convention, as amended, imposes significant obligations, both on the commander of the rescue ship and the States Parties, in terms of humanitarian obligations, primarily through the Guidelines on the Treatment of Persons Rescued at Sea (Cottone 2016, 101).

The transfer of migrants into Albanian territory by the Italian military vessels that rescued them can be considered a determination of the PoS, but only if their permanence is for the necessary time for their identification, providing them with medical care, and then immediately transferring them to their immediate or final destination. This provision of international law seems incompatible with the part of the agreement between the two states that provides for the detention of migrants in centers for up to 18 months without mentioning, among other things, the fact that they are deprived of personal freedom.

LEGAL PROFILES REGARDING THE PRINCIPLE OF NON-REFOULEMENT AND THE RIGHT TO ASYLUM

The principle of non-refoulement, now consolidated in international and European law, prohibits the transfer of immigrants not only to their country of origin but also to a third country where their life or psychophysical integrity is threatened (McEldowney 2023; Salamone 2011, 108–127; Antonucci, Papanicolopulu, and Scovazzi 2016, 68–69; Mussi 2023, 105). For the first time, this principle was foreseen by the Geneva Convention of 1951 on the status of refugees in Article 33, paragraph 1, which provides for the obligation for the States parties to the Convention not to return migrants to countries where their life or physical integrity may be threatened (Paleologo 2018, 218).

One of the critical issues related to the MoU is analyzing whether this agreement complies with the principle of non-refoulement established by international law. In this regard, the European Court of Human Rights, in the case *Jamaa v. Italy*, has concluded that the state is

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obliged not to return a person to a country where he risks being exposed to torture, cruel, inhuman, or degrading treatment or punishment (ECtHR, *Hirsi Jamma and others v. Italy*; Furramani and Bushati 2022, 114-117). This issue was one of the crucial problems that the MoU between Italy and Albania raised, according to the members of the European Parliament, which demanded clarification from the European Commission, requesting if it constitutes collective refoulement similar to that found by the European Court of Human Rights in the case *Jamaa and others v. Italy* (European Parliament 2023). In this sense, the additional Protocol No. 4 of the ECHR, ratified by both states in Article 4, guarantees the prohibition of collective expulsion of migrants. Based on the provisions of this Protocol, the European Court of Human Rights has stated that expulsion refers to a group of aliens being forced to leave the country by state authorities unless the expulsion measure is taken after an effective and differentiated evaluation process of the particular circumstances of each migrant part of the group (ECtHR, Conka v. Belgium, para. 63; Furramani and Bushati 2022, 113).

Other crucial questions regard the difference in treatment between asylum seekers rescued in the Mediterranean Sea by civilian vessels and asylum seekers rescued by military vessels and if this Protocol risks undermining the rights of defense and the guarantees of personal freedom provided by the Italian Constitution and European and international law concerning international protection (European Parliament 2023; Carrera, Campesi, and Colombi 2023, 5–6).

ITALY-ALBANIA AND UNITED KINGDOM-RWANDA AGREEMENTS: TWO PRACTICES COMPARED

Much has been discussed about the MoU between Italy and Albania. There have also been comments and comparisons of this accord with the agreement concluded between the United Kingdom and Rwanda in April 2022, according to which the asylum seekers were going to be transferred from the UK to Rwanda until the evaluation of the asylum request. It is crucial to note that other European states, such as Austria, Denmark, and Germany, want to follow this strategy. However, in the case of the United Kingdom, no transfer has yet been made, considering that the British courts have blocked the agreement; the latest decision of the British Supreme Court declared the agreement illegitimate (McEldowney 2023; Casciani and Seddon 2023). This decision, in line with the Court of Appeal Decision, declared the agreement between the United Kingdom and Rwanda in breach of the relevant international agreements concluded by the United Kingdom, as immigrants could be subjected to torture or degrading treatment, given that Rwanda is not considered a safe country (AAA (Syria) and Ors, R. v Secretary of State for the Home Department [2023] UKSC 42, 15 November 2023; McEldowney 2023) and, on the other hand, migrants also risk being transferred to their country of origin, which is prohibited by international law (McEldowney 2023).

Nevertheless, the two agreements present different elements. In the first place, in the agreement between the United Kingdom and Rwanda, the United Kingdom has recognized to the Rwandan authorities the task of evaluating asylum requests, which does not appear in the Protocol between Italy and Albania, where Italy has the task of evaluating and managing asylum requests presented by asylum seekers (Masera 2023). Another difference is that the agreement between Italy and Albania refers to the fact that the deal concerns the transfer of migrants

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rescued in non-European waters, which have not yet reached the Italian coasts. It is critical to notice that the second agreement delineates a different treatment for migrants rescued in international waters from those rescued in internal waters. In this sense, the Protocol provides that the reception centers located in Albania will be used for migrants rescued in non-European waters because, otherwise, there would be a violation of European legislation (Gentilucci 2023). Nevertheless, Albania is considered a safe country, is part of all the conventions that protect human rights, and is waiting to become a member of the European Union.

CONCLUSION

The decision of the Constitutional Court issued in January 2024 regarding the compliance of the protocol with the Albanian Constitution raises many doubts, especially when it excludes a violation of the Albanian Constitution and considers that the protocol does not consist of a transfer of part of the Albanian territory and does not restrict fundamental human rights.

The Court's interpretation turns out to be controversial since, on the one hand, the MoU provides that the Italian authorities have exclusive competence regarding the management of the centers and the practices of recognition of asylum seekers' requests, as well as in cases of non-recognition or repatriation procedures. On the other hand, the Albanian Constitutional Court expressly states that the application of Italian jurisdiction inside the centers does not exclude Albanian jurisdiction. Accordingly, in cases of violation of the human rights of asylum seekers inside the centers and considering that Albania is a party to the ECHR, Albania could be held liable even if the Albanian authorities have no jurisdiction in the matter and have not provided control mechanisms (see Albanian Constitutional Court, Decision No. 2, dated 29 January 2024, par. 13, dissenting opinion).

From Italy's point of view, the issues to be solved are different: in addition to the determination of the PoS, we had to consider compliance with the principle of non-refoulement, the detention of asylum seekers during the examination of the practice, and the guarantee of their constitutional rights during the trial and beyond.

During the executive phase of the agreement, the two countries must consider all the issues mentioned above to guarantee the respect of fundamental human rights. In any case, there is undeniable an explicit attempt by EU member states to create an "asylum request management system" outside their borders prospectively, given their inability to modify the current Dublin Rules.

In this sense, it seems that there is an attempt by the European states to create a precedent that will then be applied on a larger scale, both from the point of view of the number of migrants transferred and from the point of view of the third safe country involved in negotiations for similar agreements. This concern is comprehensible if we refer to the statements of the German and Austrian Chancellors on the issue (ECRE 2023). The choice of Albania is not coincidental, as it is an EU candidate country that meets the criteria for ensuring the safety of migrants and is a signatory to all major international conventions on human rights protection.

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CRediT AUTHOR STATEMENT

Rrezart Bushati: conceptualization, methodology, writing-original draft preparation, writing-reviewing and editing. **Emanuela Furramani:** conceptualization, writing-reviewing, and editing.

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