



# UNHCR

United Nations High Commissioner for Refugees  
Haut Commissariat des Nations Unies pour les réfugiés

**UNHCR  
Regional Representation for Northern Europe**

Ynglingagatan 14, 6<sup>th</sup> fl.  
SE-113 47 Stockholm

Tel.: +46 8 457 4880  
Fax: +46 8 457 4887  
Email: [swest@unhcr.org](mailto:swest@unhcr.org)

28 September 2015

Our code: 106/RRNE/2015

Re: **A 2015/1726/ IU Ds 2015:33**

The UNHCR Regional Representation for Northern Europe (RRNE) would hereby like to welcome the proposal “Ett gemensamt ansvar för mottagande av nyanlända” Ds 2015:33.

Pursuant to UNHCR’s mandate to provide international protection to refugees and, together with Governments, seek permanent solutions to the problem of refugees, UNHCR has a direct interest in law proposals in the field of refugee integration.

UNHCR welcomes efforts that promote the timely placement of refugees in receiving municipalities, as prolonged waiting times at reception centres and other places of temporary accommodation often negatively impact on the integration trajectories of refugees and persons in need of international protection. As UNHCR’s research conducted in 2013 shows (see “A New Beginning, Flyktingintegration i Sverige, Det handlar om tid!” available at: <http://www.refworld.org/docid/5295a60e4.html>), the integration process benefits from early support measures and the first months of reception are crucial to successful integration.

UNHCR furthermore finds it of great importance that timely allocation of municipal placement is made to enable refugees, accepted for resettlement, to travel to Sweden without undue delay. Resettlement is a key protection tool to meet the specific needs of refugees, including, for example, those with urgent legal and/or physical protection needs, women at risk and medical cases. The unavailability of municipal placements could in the worst case scenario lead to life-threatening situations for vulnerable refugees.

Yours sincerely,

Pia Prytz Phiri  
Regional Representative

Arbetsmarknadsdepartementet  
103 33 Stockholm