

Global Immigration alert

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Germany

Germany adopts bill to partially implement EU Single Permit Directive

Executive summary

On 9 July 2026, Germany's Federal Parliament (Bundestag) adopted a bill that partially implements the EU Single Permit Directive, streamlining certain immigration procedures for third-country nationals who are legally residing and working in Germany. The bill now awaits approval by the Federal Council and is expected to enter into force before the end of 2026.

Background

The directive aims to streamline certain immigration procedures across the European Union by establishing common administrative standards for third-country nationals who are legally residing and working in EU Member States.

The key elements of the directive are:

- **Single application procedure:** The directive establishes a single application process for residence and work authorization, resulting in the issuance of one combined residence and work permit through a single administrative procedure.
- **Processing timelines:** Authorities must generally issue a decision within 90 calendar days of receiving a complete application. In exceptional and justified circumstances, this period may be extended by up to 30 calendar days.
- **Employer changes:** Third-country nationals may change employers within the same EU Member State. Member States may impose certain conditions, including notification requirements and minimum periods of employment with the initial employer. In some cases, work authorization may be suspended for up to 45 calendar days while the change is reviewed.
- **Equal treatment:** Legally residing third-country nationals must receive treatment comparable to EU nationals, such as working conditions, remuneration and social security among other specifics.
- **Permit validity during unemployment:** Residence and work permits must remain valid for a minimum period following termination of employment, generally at least three months and, after two years of continuous employment, at least six months.

The directive applies to third-country nationals locally hired in an EU Member State and does not cover assignees or other temporary cross-border work arrangements.

Key developments

Germany already operates a single permit system under existing legislation, under which residence permit and work authorization are issued through a combined permit. Equal treatment protections are also largely reflected in current German law. As a result, significant legislative changes in these areas are not anticipated.

For Germany, the bill is expected to introduce provisions allowing residence permits to remain valid for a minimum period following unemployment, specifically at least three months and, after two years of continuous employment, at least six months, in line with the directive.

Further amendments and procedural improvements will likely be required to fully implement the directive, particularly regarding employer-change procedures and compliance with the prescribed processing timelines.

Although Germany has not yet completed formal implementation of the directive, certain provisions may have direct effect where they are sufficiently clear, unconditional and do not require further national measures. However, German immigration authorities are generally expected to continue applying existing national rules until implementing legislation or administrative guidance is issued.

Impact on employers

Once implemented, the directive may provide employers with greater certainty around application processing timelines and increased flexibility when hiring foreign nationals already working in Germany. Employers should continue to

monitor developments, as additional legislative changes and procedural requirements may be introduced as part of the implementation process.

Key steps

EY will continue to monitor these developments. Should you have any questions, we encourage you to contact one of our immigration professionals.

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