



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL MIGRATION AND HOME AFFAIRS

Directorate E – Migration and Security Funds  
Unit E1 – Programming

Brussels,

**Subject: Observations on the third version of the multiannual national programme under the Internal Security Fund for Italy**

Dear 

Thank you for the amended version of the national programme under the Internal Security Fund for Italy, submitted on 30 June 2015, following the observations made by the Commission on the 24 June 2015.

Please be informed that the Commission has initiated the approval process of the national programme. However, before proceeding to the next step of the formal approval by the Commission, a few outstanding issues still have to be addressed.


We would therefore like to invite you to take into account the additional observations and kindly ask you to modify the draft programme accordingly.

In order to proceed smoothly with the final stage of the approval process, an amended version of the programme has to be submitted as soon as possible.

Kindly note however, that the programme could still be subject to modification throughout the final stage of the approval process.

Yours sincerely,

(e-Signed)

  
Head of Unit

Encl.: Annex: Observations on the proposed national programme

## **ANNEX: Observations on the proposed national programme**

### **General**

The national programme is now practically ready for approval, with only a few pending issues still needing to be addressed.

### **Section 1: Executive summary**

1. We would appreciate if the executive summary could be redrafted in the sense of presenting a coherent text with clear policy strategies, objectives and actions, rather than just an enumeration of actions/activities.

### **Section 2: Baseline situation in the Member State**

2. Italy still needs to provide information on what are its needs with respect to first reception, as requested before.

3. The information on the state of play is appreciated; however, the information provided on the needs as regards the implementation of Eurosur is still insufficient.

### **Section 3: Programme objectives**

4. The operational priorities where the bulk of the ISF/B allocation will be focused are not yet clearly presented. Please revise the draft to provide more clarity on this aspect.

#### ***SO1 – Support a Common Visa Policy***

5. Please note that the ICT systems related actions have a broader scope than just Schengen Visa processing, therefore at implementation phase Italy should pay attention to appropriate cost claims (proportionate to the share of workload related to Schengen visa processing). Moreover, the ICT development should concern Schengen visa processing.

#### ***SO2 – Borders***

##### ***National Objective 2 – Information Exchange***

6. Please note that only illegal activities which are linked to the movement of persons are relevant for ISF-Borders. Therefore, please, include a reference to compliance with article 3.3 b), as discussed during the recent meeting in Brussels.

7. Please note that, in light of the identified need for increased inter-agency cooperation in EU borders management, as indicated in the 2013 Guidelines for cooperation between Border Guards and Customs Administrations, Spain is invited to provide information on the existing customs cooperation in the baseline, as well as to include a strong component of inter-agency cooperation in the actions planned under the national programme (i.e. structured exchange of information, risk analysis, training, equipment, investigations, operational activities at Border Crossing Points).

#### *National Objective 4 - Union Acquis*

8. Please remove the reference to Annex 5 (additional document) which will not form part of the national programme.

#### *National Objective 6 - National Capacity*

9. Please note that the development of Smart Borders is already covered by the Smart Borders envelope. Therefore, the activities that can be funded through the National Program are limited to:

- a) Border equipment, such as ABC gates (average price should be around € 200k), self-service kiosks, equipment at Consulates such as fingerprint readers, equipment taking facial image, mobile kits, etc. (I see that the use of ABC gates is already mentioned under SO2 NO3)
- b) Additional staff for project management, procurement, change management, helpdesk, design, analysts, trainings for border guards and consulates/embassies etc., additional staff to support law enforcement.
- c) National infrastructure, such as end-user adaptation of border control applications for EES/RTP, hosting space for national EES/RTP, network to connect the national uniform interface to the national EES/RTP, connecting border control posts to the national EES/RTP through national mobile communication network, security infrastructure, etc.

#### ***SO3 – Operating Support***

10. Please replace “management of migration” by “border management”.

11. As regards our previous observation n°40, which Italy did not take on board, we would like to note that, as you know, for Italy's External Borders Fund annual programmes 2007 – 2010, a 5% flat-rate financial correction was applied to the EU contribution to the Fund on the basis of a finding of the European Court of Auditor's performance audit on the EBF. According to this finding Italy had experienced deficiencies in providing a solid justification for the financing logic and apportionment of the costs for actions related to fibre-optic infrastructure providing communication channels between the offices of Polizia di Stato. The same financial correction was recently proposed by the Commission for the closure of the EBF Annual Programme 2011 on the basis of similar findings.

We note that in the draft ISF national programme, under the SO3 NO2 "*Operating support for borders*", Italy has included an action relating to technical assistance and maintenance for fibre-optic infrastructure of Polizia di Stato (i.e. task 4.2 in Annex 7 "*Operating Support Frontiere*"). In order to prevent the risk that the eligibility of such activities is put into question as in the case of the External Borders Fund, and that financial corrections are consequently applied in the future in accordance with Art 47 of the Regulation No 514/2014 of the European Parliament and of the Council, we strongly

recommend that Italy establishes an apportionment key for the financing of this action, which reflects the actual use of this infrastructure for the objectives of the ISF – Borders and Visa. An alternative option could also be to simply remove this action from the national programme.

## **Section 6: Framework for preparation and implementation of the programme by the Member State**

12. Reference should be made also to coordination with ESF funded actions in general, and in particular in the field of institutional capacity. The programme should also better explain the demarcation line between actions funded through it and ESIF funded actions, in particular the OP Legality.