



**EUROPEAN COMMISSION**  
 DIRECTORATE-GENERAL MIGRATION AND HOME AFFAIRS  
 Directorate E – Migration and Security Funds  
 Unit E1 – Programming

Brussels,

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

Dear [REDACTED]

Thank you for the amended version of the national programme under the Internal Security Fund for Spain, submitted on 1 July 2015, following the observations made by the Commission on the 22 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)*

[REDACTED]

Head of Unit

Encl.: Annex - Observations on the proposed national programme

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**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.

**Identification of the designated authorities**

1. We take note that the formal full designation has not taken place yet, only a provisional one.

**Section 3: Programme objectives**

***SO1 – Support the Common Visa Policy***

2. Please note that one of the expected results foreseen under National Objective 1 (*National Capacity*), “increased consular cooperation”, does not correspond to the objectives/funding priorities of this NO, and should therefore be removed from this section.

***SO2 – Borders***

3. As already noted, 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).
4. As regards National Objective 2 (*Information exchange*), and although no further details have been provided on EURODAC related measures, the Commission assumes that Spain will fund under ISF-B only those EURODAC related measures related to border management.
5. Under the same NO, please confirm that the national programme will be used to finance around 10% of the measures related to the PDYHR (the share estimated to be linked to border control). On the other hand, BDSN is indicated as a database of national reports. Please, give more detailed information (if needed, in a separate document) on this system so that its eligibility can be properly assessed. If it is not entirely used for border control purposes, proportionate financing should be applied.
6. As regards National Objective 5 (*Future Challenges*), we understand from the explanations provided by Spain in an additional document that the structure of the '*National Centre for Border Management*' (*Centro Nacional de Gestión de Fronteras*) of the National Police duplicates to a significant extent the structure and the functions of the Eurosur NCC with view to performing similar activities as regards border checks. Without questioning Spain's choice to establish such centre, the Commission would like to stress that due cooperation, coordination and exchange of information have to be ensured between the Eurosur NCC and the '*National Centre for Border Management*' (*Centro Nacional de Gestión de Fronteras*). Spain has notably to ensure that a liaison officer of the national police is present at the Eurosur NCC.
7. As regards National Objective 6 (*National Capacity*), it would be useful to have further information on ADEXTTRA and ATLAS.

8. As regards Specific Action 2 (*Frontex Equipment*), please separate the costs of projects, as specific amounts were awarded per type of equipment and not as a global envelope. Additionally, as requested before, we would appreciate to have a short description of each type of equipment (draft provides a short description for the ATV vehicles only)

### **Section 3: Indicative timetable**

9. Under “*FRONTEX Equipment*” Spain should add ATV vehicles and remove the reference to an helicopter, since such equipment was not approved for funding under the national programme.

### **Section 5: Common Indicators and Programme Specific Indicators**

10. Under SO1, please double check indicators C.2.2 , which seems rather low, as well as indicators C.4.1 and C.4.2, which seem incoherent.

### **Section 7: The financing plan of the programme**

11. Considering the amount allocated to SO2 (*Borders*), it would be useful to have, in a separate document, an indicative breakdown of costs within each one of the NO.