Subject: Observations on the third version of the multiannual national programme under the Asylum, Migration and Integration Fund for Italy

Dear [Name],

Thank you for the third version of the national programme under the Asylum, Migration and Integration Fund for Italy, submitted on 29 May 2015, following the observations made by the Commission on the 7 April 2015.

Following the re-examination of the national programme by the Commission, we would like to provide you with additional observations on this amended version, and invite you to present us with a modified programme as soon as possible.

The period of six months set for the approval of the multiannual national programme by the Commission, referred to in Article 14(7) of Regulation (EU) No 514/2014, is hereby suspended until a revised version of the programme is submitted.

Yours sincerely,

Head of Unit

Encl.: Annex: Observations on the proposed national programme
ANNEX: Observations on the proposed national programme

General

We are pleased to note that Italy took in consideration the observations made by the Commission on the previous versions of the national programme.

The national programme is now practically ready for approval, just needing a couple of changes and clarifications that we would ask Italy to provide as quickly as possible, so that its approval takes place without further delay.

Identification of the designated authorities

1. As regards the Management and Control System, please complete fully the table in the first page (there is no indication of the activities delegated) and provide a description of the system in the respective section of the national programme, summarizing, in accordance with article 2 of Delegated Regulation (EU) N°1042/2014, the main division of responsibilities between the organisational units of the Responsible Authority, its relationship with the Delegated Authorities, the activities to be delegated and the main procedures for supervising these delegated activities, as well as the main procedures for processing financial claims from beneficiaries and for authorising and recording expenditure.

Section 3: Programme objectives

SO1 – Asylum

2. We note that, although reference to fingerprinting is made in the baseline situation, no specific reference to such important activity is made neither in the presentation of the national strategy for asylum nor in the respective national objective. Considering its relevance, in particular in the current context in which fingerprinting has been identified as one of the major issues to be addressed by Italy, we believe that a clear reference to such action should be made in the relevant sections of the national programme.

3. As regards National Objective 2 (Evaluation) reference should be made to actions on statistical data collection in relation to EASO Eurostat collection mechanism.

SO2 – Integration / Legal Migration

4. When describing the programme’s objectives reference to complementarity with ESF should be made at a general level, not only for those two actions specifically mentioned in the programme, as such complementarity is extremely relevant also for other actions such as fight against early school leaving and governance.

SO3 – Return

5. In the current context in which the EU aims also to increase its effectiveness as regards return measures, we invite Italy to specifically mention as one of the objectives of the programme the following action: “support to the implementation of the European Agenda on Migration (EAM) in the area of return, including the strengthening of its national infrastructure of pre-removal centres”.

6. We also note that Italy sets as target 12.000 forced returns supported through the national programme. In the current context of high migratory pressure, and considering that in the period June 2009 / June 2014 Italy forcibly returned 24.000 persons with support from the
EU Return Fund, we would like to know the total number of persons that Italy foresees to forcibly return in the next seven years, meaning with and without AMIF support.

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

7. As regards coordination and complementarity with other instruments, and considering the high level of complementarity between AMIF and ESIF (ESF and ERDF), through which support might be provided not only to the integration of third country nationals but also to the first reception of asylum seekers, we invite Italy to further elaborate on the coordination mechanism set up at national level in order to reinforce the synergies and avoid overlapping between the funds. In this context, Italy might consider including the Labour Ministry as member of the monitoring committee of the programme.