



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

Directorate D – Strategy and Delivery Steering  
Unit D3 – MFF Programming

Brussels,

**12 DEC. 2014**

**Subject: Observations on the proposed multiannual national programme under the Internal Security Fund for Greece**

Dear [REDACTED]

Thank you for the proposed national programme under the Internal Security Fund for Greece formally submitted on 7 November 2014.

In accordance with Article 14(6) of Regulation (EU) No 514/2014 of the European Parliament and of the Council (Horizontal Regulation) *"The Commission shall make observations within three months of the date of submission of the proposed national programme. Where the Commission considers that a proposed national programme is inconsistent with the objectives of the Specific Regulation, in the light of the national strategy, or that the Union funding to be allocated to those objectives is insufficient or that the programme does not comply with Union law, it shall invite the Member State concerned to provide all necessary additional information and, where appropriate, to modify the proposed national programme."*

Following the examination by the Commission, we would like to provide you with our observations at this stage of the process and invite you to present us with an amended version of the programme within one month from the reception of this letter.

In general, the proposed programme has been prepared against the background set up in the applicable legal framework. Nevertheless, we would like to draw your attention to the observations provided for each section and kindly ask you to modify the programme in this respect.

We would like to assure you that we stand ready to assist you in drafting the national programme and speed up the approval process.

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 an amended version of the programme is provided.

Yours sincerely,

Head of Unit

Encl.: Annex - Observations on the proposed national programme

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

**General**

1. Many of the key issues agreed in the Policy Dialogue held in October 2013 in Athens are not addressed in the draft national programme. Many of the observations made on the draft informally submitted by Greece last June are not duly taken into account. The executive summary should be totally redrafted, the baseline situation requires substantial improvement, as well as the sections on the programme objectives, since neither the national strategy nor the programme main priorities are presented in an adequate manner for any of the sections. No reference is ever made to Greece's Action Plan on Migration and Asylum, in spite of its relevance for many issues addressed by the programme. Some of the minimum percentages are not respected, and no proper justification is given.

**Identification of the designated authorities**

2. We take note that, although the formal designation process of the Responsible Authority has not been finalised yet, the Responsible Authority (RA) and the Audit Authority (AA) will in principle be the same as for the former SOLID Funds. We take also note that no Delegated Authority is foreseen. We would invite Greece to conclude the formal designation process as soon as possible and, once the RA has been formally designated, to provide the documents foreseen in article 2 of Commission Delegated Regulation n°1042/2014.

3. We also note that no summary description of the Management and Control System (MCS) is provided, thus preventing our services from assessing such system in particular as regards its relevance in the light of the actions envisaged. We therefore invite Greece to provide such a description in the amended version of the programme.

**Section 1: Executive summary**

4. The draft programme does not provide a true executive summary. It consists essentially in a presentation of the broad principles under which the programme has been prepared, referring essentially to the broad objectives of the funds. The presentation is rather incoherent (for instance the drugs issue deserve a separate paragraph, while all the remaining policy areas are put together in a single paragraph) and the figures given at the final paragraph do not match the funding available for Greece's national programme and do not correspond to the figures given later on in the document. We recommend that this section is entirely redrafted.

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

5. The presentation of the baseline situation is very incomplete and must be substantially redrafted, in particular as regards the identifications of gaps. There is no direct link between the baseline situation and the objectives, in particular as regards border management, and no information at all is given for the policy areas falling under the remit of ISF-Police.

6. No reference is ever made to the Greece's Action Plan on Migration and Asylum, in spite of its relevance for many of the issues being addressed in the national programme. No reference is made to many of the priorities identified in the policy dialogue, and no reference is made to any strategy.

7. The information on borders and visa is given in a rather incoherent and unstructured manner: the draft contains some comments that are not relevant with regard to the common visa policy (reference to "communicating vessels", marriages of convenience, directives ICT,

“Blue Card”, etc.) and lacks essential information, notably on the institutional set up, on past EU funding and on national budget resources. The data on visas issued in 2013 is not given (although such data is given later on under the respective specific objective). A specific section dedicated to the first reception centres is put at the end, separated from the one on borders.

8. On border management, there is a description of the current migratory flows affecting Greece (this description could be shortened) but there is no description of needs/requirements/gap analysis linked to such challenges. In particular, it would be useful to outline such needs/gap analysis per border type (land and maritime). More specifically, GR should describe the current situation and the requirements/needs for each area of intervention (see link with objectives), i.e. on the integrated maritime surveillance system in the Aegean, the automated surveillance system along the land borders, the NCC, the First Reception Centres, the Shield operation, the equipment for border checks and surveillance. No reference is made to results/actions implemented under the EBF.

9. No reference is made to the Schengen Evaluations: the baseline situation should clarify whether all the recommendations were addressed and, if not, what are the outstanding issues.

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

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

10. No appropriate strategy has been described. The draft national programme submitted just mentions in this section a few of the country needs in the area of visa policy, information which as a matter of fact should rather be provided in the baseline situation. In fact the presentation of this section was much better in the draft of the programme informally submitted last June.

11. The national objectives are presented in a very sketchy manner. In general Greece provides a list of actions/activities to be implemented, very often at project level, with no distinction between the main actions to be funded by the EU and the others. No desired outcomes or expected results are mentioned.

12. As regards National Objective 1 (National Capacity), the draft just presents a list of activities to be implemented, sometimes with the same items/actions being presented twice. This section should be significantly redrafted to better fit into the funding priorities identified in the Policy Dialogue. More details are needed as regards for instance the “consular relocation and upgrading” (also consular authorities' relocation/renovation costs) as well as examples of locations in which consular authorities will be refurbished. As EU funding should address Greece's needs in terms of Schengen visa processing, Greece should mention the consulates processing Schengen visas that will be specifically targeted by the programme.

13. As regards the National Objective 3 (Consular Cooperation), although it was identified as a desired outcome/funding priority in the Policy Dialogue, Greece still does not foresee any action in the programme.

#### ***SO2 – Borders***

14. The section is a presentation of the state of play of the current migratory flows and of recent achievements, in particular as regards land borders. In fact, apart from enumerating a few very vague objectives, this section essentially presents the positive results achieved with the improvement of border control at the Greek-Turkish land border. Greece should rather indicate its main operational and financial priorities in border management and explain how these priorities address the main gaps, needs and challenges identified in the baseline situation. Besides, some information provided in this section should be placed in the baseline situation section instead.

15. The draft does not present a national strategy for border management including all components (sea and land borders, first reception, central coordination mechanisms), as agreed in the Policy Dialogue. As noted before, without such a comprehensive strategy it is difficult to assess whether ISF allocations are used in the best way to address the identified priorities. The presentation is therefore not satisfactory and the document should be totally redrafted.

16. To note also that the percentage of 223% quoted on page 11 of the document for the increase of arrests should be 323% instead.

17. The draft does not provide the main actions / funding priorities to achieve each national objective (NO), including the targets (desired outcomes and results): it just lists, for NO 1, 3 and 6, a series of activities/projects to be covered by the fund, with no detailed explanation on each of them (although such details have been asked before), while nothing at all is proposed for NO 2, 4 and 5. Due to the lack of information, it is impossible to assess to what extent the proposed actions address the country needs and how they fit into a proper strategic approach.

18. As regards National Objective 1 (Eurosur), the effort made by Greece, considering the total amount at stake for the whole objective (67,5M€), to give an indicative amount for each sub-objective (Integrated Maritime Surveillance System, NCC, etc.) is well appreciated. Such indicative amounts provide indeed a valuable information on the priorities. However, in order to allow more flexibility to the programme (and avoid revision) it is suggested to make it clear in the programme that those amounts are purely indicative. Greece should also make a clear link between the objective/sub-objectives and the requirements/gaps identified in the baseline situation.

19. As regards National Objective 3 (Common Union Standards), and as noted above although the indicative amounts given for some actions are well appreciated, as they provide a valuable information on the priorities, it is suggested, in order to allow more flexibility to the programme (and avoid revision), to make it clear in the programme that those amounts are purely indicative. Greece should also make a clear link between the objective/sub-objectives and the requirements/gaps identified in the baseline situation.

20. As noted above, nothing is said as regards National Objective 2 (Information exchange), 4 (Union *Acquis*) and 5 (Future Challenges).

21. As regards National Objective 6 (National Capacity), and considering the amount proposed (30M€), we would invite Greece to follow the same approach as for objectives 1 and 3, i.e. providing an indicative estimate of the amount foreseen for each sub-objective. Also, sub-objectives need to be linked to requirements/gaps identified in the baseline situation. Moreover, clarifications should be provided on the possible use of drones (notably what it is meant by "supply of drones instructors for the surveillance of the borders"). As regards the Shield Operation, Greece should provide more details on such operation (timeline, resources, complementarity with other measures, etc.) and linking to the baseline situation: to be considered also whether such operation should not be placed in the operational cost section.

### ***SO3 – Operating Support***

22. We note that Greece confirms that it complies with the Union *Acquis* on borders and visa but it gives no explanation on the strategy adopted to remedy the outstanding recommendations from the Schengen Evaluation Report (e.g. infrastructure at sea BCPs).

23. We note also that the annex on Operating Support has not been attached to the draft national programme. 24. As regards more specifically operating support for visas, we would like to note that the refurbishment of premises already features under NO1 (National Capacity): for the sake of coherence and to avoid possible duplicating actions, we would propose that Greece presents such actions under only one national objective. We note also that the action described

as “Replacement of existing equipment related to the processing of Schengen visas, including security related equipment” is just a quotation from the programming manual. Greece is invited to elaborate more on such action in the annex.

25. As regards more specifically operating support for borders, the information provided should be further elaborated, in order to describe the priorities of the objective, the main areas of the intervention and their link with the baseline situation: the current draft provides essentially just in a list of specific projects. Besides, we note also that Greece includes some activities (construction of facilities, creation of centre) that seem not to comply with the type of costs eligible for operating support.

#### ***SO4 – Preventing and combating crime***

26. The draft presents no clear strategy in this area. The document refers to the Strategic Plan of the Hellenic Police for 2014-2020 and enumerates a series of rather vague objectives/actions without providing the global approach: no reference is made to the main key issues agreed at the Policy Dialogue, with the exception of training as a cross-cutting/horizontal issue. As no baseline situation has been presented for the areas under ISF-Police remit, it is impossible to assess to what extent the country needs in this area are properly addressed. In fact this section of the programme is more poorly presented than in the previous version informally submitted last June.

27. The draft presents just a list of actions/projects for NO1 (C-Prevention and Combating) - for which most of the funding (16.6 million from a total allocation of 20.4 from ISF-Police) is allocated - and just one for NO2 (C-Exchange of Information) and NO3 (C-Training). No actions are foreseen for NO4 (C-victim support) and NO5 (C-threat and risk assessment). Actions are presented in a unstructured manner.

28. No reference at all is made to anti-corruption, although fighting against corruption has been identified as a priority in the Policy Dialogue, Greece being amongst the EU MS where fighting corruption is an issue of key importance.

29. As in the previous version informally submitted last June, Greece’s objectives as regards financial investigation are not clear: reference is made to “economic crime” but nothing is said about actions to be financed in line with FATF definition of FI and Council final report recommendations on financial investigation, including issues such as asset recovery and exchange of information between banking institutions, insurance companies, Ministry of Finance, land registration offices, etc. which were identified as desired outcomes/funding priorities in the Policy Dialogue.

30. As regards more specifically National Objective 1 (C-Prevention and Combating), the actions presented consist essentially in a list of equipment to be purchased through the fund, with no clear linkage to the key issue they are intended to address. The Greek Cybercrime Centre is mentioned but without any further information being provided. There is no mention of child sexual exploitation online, which was agreed in the Policy Dialogue to be a problem needing special attention. On the other hand, some activities are repeated. Reference is just made to anti-radicalisation measures, with no other detail provided: in this area, Greece is invited to consider funding for so called “exit programmes”, which help individuals to leave terrorist groups (“disengagement”) and reject violence (“de-radicalisation”). Contrary to other sections, no indication is given on the amount of funding foreseen for each activity.

31. One single action (creation of a single point of contact concerning the international police cooperation) is foreseen as regards National Objective 2 (C-Exchange of Information). As regards prevention of radicalisation, Greece could consider creating forums/platforms for practitioners (not only police officers, but prison and probation staff, health and social workers, etc.) to exchange experiences, knowledge, best practices, etc.

32. As regards National Objective 3 (C-Training), only one action is foreseen, having combating money laundering as its only objective. As regards prevention of radicalisation, Greece should also include first-line practitioners (apart from police officers, also prison and probation staff, health and social workers, etc.) as beneficiaries from training on how to prevent, recognise and tackle radicalisation. However, it should be noted that specialised training activities developed and funded by the national programme should be provided in full complementary and cooperation with CEPOL and other sources of financing through ISF-P.

### **SO6 – Risks and crisis**

33. The strategy on this specific objective is too summarily presented. As no baseline situation has been presented for the areas under ISF-Police remit, it is impossible to assess to what extent the country needs in this area are properly addressed through the proposed national programme.

34. Only one action is presented for NO1 (R-Prevention and Combating), NO3 (R-Training), NO5 (R-infrastructure) and NO7 (R-threat and risk assessment). While actions proposed under the last three NO are relatively well explained (although the amount for the one under NO3 seems insufficient), no explanation is provided as regards the action “Purchase of the necessary equipment for the newly established Information Management and Analysis Service”, for which an amount of 0.9 million is foreseen. Also some activities put under NO5 might be better placed under NO3 (training).

35. More specifically as regards NO3 (R-Training), the Commission welcomes the initiative of setting-up a multi-purpose CBRN-E training facility. Since the ambition of Greece is to become a reference training ground for Southeast Europe and provide specialized courses and dedicated CBRN-E curricula to interested organizations, we would like to note that it is crucial that the relevant Commission services are involved in the design of the facility and – especially – the training curriculum.

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

36. Although the indicative timetable is very detailed, there is some incoherence. For instance while the start of planning for the establishment of FRC in Attica and Dodecanese is foreseen only for 2015, the operating support to the latest is foreseen from 2014 (no mention made to operating support to FRC Attica). As regards SO2 NO3 (Common Union Standards), the start of the implementation phase for the training of border guards and relevant competent authorities on EU and international law is foreseen already in 2015, while for the pilot Entry-Exit system it is foreseen to start in 2019.

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

37. The common indicators given are not really fully consistent with the chosen funding priorities and the allocations for the various SOs and need therefore to be reviewed. More specifically:

38. As regards SO Visas, the draft refers to support to 150 consulates, although currently Greece has only 129 and document does not mention the intention to establish 21 more. Also, the target value of indicator C3 is 0, whereas under SO1 Greece mentions an action consisting in “posting field workers in selected consular authorities”.

39. As regards SO Borders, the target value for indicator C2 (Number of border control infrastructure and means) is extremely low (ie. 43), while regarding the indicator on the use of ABC, the target value should be reviewed in line with the clarifications provided in the programming manual.

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

40. Draft gives a very short summary of the approach taken and the involvement of partners and key stages of broader consultation for the preparation of the programme, and does not provide a list of the main partners involved or consulted (or type of partners). More information on this issue would be most welcome.

41. No clear explanation is given on the coordination mechanisms and no reference is made to EU external aid funds and coordination with other EU Agencies apart from Frontex. Some more details on these issues would be most welcome.

42. As regards the Common Monitoring and Evaluation Framework, we would like to stress the importance of establishing a strong framework ensuring proper monitoring, follow-up and adequate procedures for project allocations.

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

43. Please note that the minimum percentages of 25% for National Capacity and 5% for other objectives under ISF-Borders are not respected and no acceptable justification is given.

44. Only once Greece has submitted a revised version of the programme would the Commission be in a position to check if the allocations for the National Objectives are reasonable and correspond to the actions under the funding priorities and the targets set for them.