



EUROPEAN COMMISSION
DIRECTORATE-GENERAL MIGRATION AND HOME AFFAIRS

Directorate E – Migration and Security Funds
Unit E1 – Programming

Brussels,

Subject: Observations on the second version of the multiannual national programme under the Internal Security Fund for Greece

Dear [REDACTED]

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

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 Greece's draft NP for ISF submitted on the 30/06/2015

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. As regards the Management and Control System, please complete fully the table in the first page (column on delegated activities is not filled in).

Section 2: Baseline situation

2. Please complete the baseline situation with a brief description of the institutional set-up (we note that the short description made in a previous version has been removed from this new draft), and information on the annual national spending in the area of border management (a global figure, if possible).
3. We note also that the figures given on total funding received by Greece from EBF still do not correspond to the real situation: the total allocation for Greece under EBF (207 m€ 2007-2013) could not fully be used and figures are therefore still not accurate. According to our records, Greece used roughly only 150 m€ of the funds allocated (if one assumes that the allocation for 2013 can be fully used). Also, the information on VIS related actions until AP 2011 differs from the information we possess, since according to SFC a total of approximately 24 M€ have been spent by Greece on VIS related actions (COM allocation 19M€). We would therefore recommend that Greece provides just approximate figures when no reliable and totally accurate figures can be given.

Section 3: Programme objectives

S02 – Borders

4. 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, Greece 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).
5. As regards National Objective 6 (*National Capacity*), please provide, as requested previously, in a separate document some indicative technical specifications of the category of the planned UAVs (e.g. maximum take-off weight, maximum heights and length of operation) as well as the indicative number of items to be purchased.

S05 - Preventing and combating crime

6. As regards anti-corruption measures, it would be useful if Greece could provide some information (in a separate document) on the new Law 4320/2015, which abolishes the post of the National Coordinator of Anti-Corruption, and the changes it brings in terms of distribution of responsibilities, as well as its impact on issues such as increased transparency and effective checks for public procurement, protection of whistle-blowers, enhanced cooperation between local administration, external control mechanisms and law enforcement.

Section 3: Indicative timetable

7. We note that some actions are foreseen to start in 2015. As no formal designation (provisionally or fully) of the RA authority has taken place yet, we alert once again Greece for the urgent need to formalise such designation, as without such designation no initial pre-financing payments can be made by the Commission, and any payments made by a non-designated authority in 2015 to cover costs to be charged to the Fund are not eligible.

8. We also note that the establishment of the start implementation phase of the new First Reception Centre in Attica (*NO6 - National Capacity*) is envisaged only for 2017 (and being finalised by 2020). In view of the current situation of extremely high migratory pressure at Greece's borders, Greece may consider a shorter time frame for the implementation of such action.

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

9. The draft provides under paragraph 6.6. for the coordination and complementarity with other EU financial instruments, including the ESIF. As regards actions to be funded under the ESIF, Greece should make sure that only actions falling within the scope of the ESF and ERDF, as defined under their respective legal acts, and eligible under the EU and national rules can be supported. In addition, it would be useful to have more specific information on the type of actions complementary to ISF envisaged to be supported by the ESIF. We would like to stress, once again, the importance of ensuring close coordination between the managing authorities of the respective programmes. In particular, as regards the OP Public Sector Reform and ISF, a close coordination between both Managing Authorities must be ensured, to avoid overlapping and any possible double financing. Please also note that all ICT actions implemented in Greece have to be in line with the Digital Growth Strategy for Greece which is currently at its finalisation stage.

10. As regards direct awards, please revise the explanation provided, which is not entirely clear and in line with applicable regulations.