



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 Asylum, Migration and Integration Fund for Greece

Dear [REDACTED]

Thank you for the amended version of the national programme under the Asylum, Migration and Integration Fund for Greece, submitted on 30 June 2015, following the observations made by the Commission on the 26 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

ANNEX
Observations on Greece's draft NP for AMIF submitted on the 30 June 2015

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

1. We invite Greece to submit in SFC2014, as a separate document, the document sent to the Commission some weeks ago, on the occasion of the Commission's mission to Athens, titled "Housing of vulnerable groups of legally residing TCNs in decent conditions by providing accommodation in rented apartments", where Greece describes its strategy in this area.
2. Please correct, on page 16, the reference to "TNCs": it should read "TCNs" instead.
3. On page 9, please put back in the programme the footnote on Kosovo which reads "*This designation is without prejudice to position on status, and is in line with UNSCR 1244/1999 and the ICJ opinion on the Kosovo Declaration of Independence*", which was deleted from the latest version of the programme.
4. The draft provides under paragraph 6.6. for the coordination and complementarity with other EU financial instruments, including the ESIF. However, we note that as regards ERDF there is no indication of the type of actions that will be supported through this Fund (such as refurbishment of buildings or building open accommodation structures, etc.). We would invite Greece to be more specific on the type of actions to be support through ERDF. We would also like to stress that the actions programmed under ERDF have to be in line with the objectives of the operational programmes, in particular under TO9 (Social Inclusion), and take in consideration the eligibility rules and resources available. We would invite Greece to set up a clear mechanism to ensure complementarity between the ESI Funds and the AMIF and avoid overlapping between those funding sources.