



Brussels,

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

Dear [REDACTED]

Thank you for the amended version of the national programme under the Asylum, Migration and Integration Fund for Italy, submitted on 25 June 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

### General

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

### SO1 – Asylum

1. We note that, although reference to fingerprinting is made in the baseline situation, no specific reference to such important activity continues to be 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. As discussed, we would therefore propose that, when describing Italy's strategy under SO 1 (Asylum), the text reads like this:

- *"L'identificazione dei cittadini di Paesi terzi di nuovo ingresso e dei richiedenti asilo mediante rilevamento delle impronte digitali, verrà assicurata sia nell'ambito delle attività ordinarie garantite dalle competenti Autorità nazionali, sia attraverso gli interventi previsti dal Fondo Sicurezza Interna (OS2-OS5)."*

### SO3 – Return

2. In the current context in which the EU aims to increase also its effectiveness as regards return measures, it is particularly important to demonstrate that progress is being made in improving return rates especially from those countries from which potential beneficiaries of international protection will be relocated. The Commission is therefore encouraging EU Member States faced with high migratory pressure at their borders to take the necessary measures, including by mobilising the necessary funding, to ensure the availability of means not only to implement voluntary and forced returns, but also to ensure the availability of enough places in pre-removal/detention centres for returnees. We invite Italy to include in its national programme for AMIF also measures to strengthen its national infrastructure of pre-removal centres, notably by identifying clearly such measures as a funding priority under the relevant national objective of the programme. As discussed, we recommend Italy to therefore revise its national programme along the following agreed lines:

- Add to the programme in the section presenting the strategy for SO3 (Return) a clear mention to the national objective of having within a short deadline (2015/2016) 1500 pre-removal places fully operational, explaining also that respective funding will be provided through national budget and AMIF;
- Include in the relevant section of the programme (NO1 - *Accompanying Measures*) of SO3 (*Return*) an action concerning the support to the refurbishment/renovation and running of pre-removal centres for returnees, with the respective expected result/desired outcome;
- Add a minimum of 5M€ to this NO1, to cover those costs (by reducing budget of other SO)
- Include such specific action in the indicative time-plan of the programme.

Also in the context of the current discussions on plus effective return, Italy may want to consider the possibility of increasing in the programme the target number of returns (and possibly increasing also the budget for returns by reducing budget of other SO).

We believe that by doing so the programme is better equipped to adequately support Italy in its efforts to address the challenges posed by the extremely high migratory pressure at its borders.