



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

Directorate E – Migration and Security Funds  
Unit E1 – Programming

Brussels,

**Subject: Observations on the proposed multiannual national programme under the Asylum, Migration and Integration Fund for Spain**

Dear [REDACTED]

Thank you for the third version of the national programme under the Asylum, Migration and Integration Fund for Spain, submitted on 12 May 2015, following the official observations made by the Commission on 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,

(e-Signed)

[REDACTED]  
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 the programme is now practically ready for approval, just needing a couple of small corrections.

### **Identification of the designated authorities**

1. We appreciate the detailed information provided by Spain in a separate document on the programme's management and control system and we invite Spain to provide a brief summary of that information in the national programme itself. In fact, the table on the first page is not fully completed (no information is given on the activities delegated) and reference is made to the type of procedures foreseen without describing them. We would therefore ask Spain to complete this section by filling in the table and providing in the respective section some brief information on the main division of responsibilities between the organisational units of the Responsible Authority, its relationship with the delegated authority, the activities to be delegated and the main procedures for supervising these delegated activities, as well as a summary of the main procedures for processing financial claims from beneficiaries and for authorising and recording expenditure.

2. Moreover, in line with article 31 of Regulation n°514/2014, the Commission would appreciate to receive information on the reasons leading to the provisional designation as well as the content of the action plan, and invites Spain to transmit also the respective audit reports.

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

3. If possible, it would be useful to have statistical information further updated with data on 2014 (where lacking) and the first months of 2015.

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

#### **SO1 – Asylum**

4. On National Objective 2 (*Evaluation*), it would be useful to have further information on the action “*an effective information, data collection and analysis system*”.

#### **SO2 – Integration and Legal Migration**

5. We invite Spain to transfer all measures supporting Unaccompanied Minors under National Objective 1 (*Legal Migration*) to National Objective 2 (*Integration*), where considering their nature they are better placed, and consequently adjust the respective funding in the financing plan.

#### **SO3 – Return**

6. As regards National Objective 1 (*Accompanying measures*), we note that the action “support to the forced return monitoring mechanism” was transferred to National Objective 3 (Cooperation). We would appreciate if Spain could put it back under NO1, where we believe it is better placed (please see Manual for Programming).

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

7. We believe that the justification provided under section 6.7.2 for direct award should be further refined, to be entirely in line with the conditions set in article 7.3 of Delegated Regulation 1042/2014 (for instance by saying “...*en función de su competencia exclusiva (técnica o administrativa)*”).