



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL HOME AFFAIRS

Directorate E – Migration and Security Funds  
Unit E1 – Programming

 Ref. Ares(2015)1895054 - 05/05/2015

Brussels,

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

Dear [REDACTED]

Thank you for the second version of the national programme under the Asylum, Migration and Integration Fund for Italy, submitted on 2 April 2015, following the observations made by the Commission on the 6 February 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,

[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 Italy took substantially in consideration the observations made by the Commission on the previous version. However, to be considered ready for approval the national programme still needs to be completed on a number of points. The information provided in terms of objectives, actions, funding priorities and expected results must be better structured and relevant information provided in the separate documents attached in SFC should be incorporated as much as possible in the national programme.

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

1. We take note that no formal designation of the Responsible Authority (RA) has taken place yet (provisionally or fully). Please note that the RA shall be formally designated before making payments eligible to the Funds. We would like to furthermore draw your attention to Article 35 of Regulation n°514/2014 in which it is stipulated that the initial pre-financing payments by the Commission following the approval of national programme shall be paid to the designated RA.
2. Moreover, should the RA be provisionally designated, we invite Italy to inform about the duration of the provisional designation and, in line with article 31 of Regulation n°514/2014 and to allow the Commission to have a clear view on the reasons leading to the provisional designation as well as the content of the action plan, to transmit also the respective audit reports (including the conclusions i.e. non-compliances, the timeframes to address these non-compliances, etc.).

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

3. Although the draft provides a fairly good presentation of the baseline situation, it still needs to be completed, in particular as regards the following points:
  - As presented for the other policy areas, it would be useful to have also for return the numbers concerning 2014, instead of aggregate statistics for the period 2009-2015.
  - Furthermore, and considering the crisis situation in the Southern Mediterranean, it would be useful to have if possible data concerning the first months of 2015, in particular on asylum seekers and unaccompanied minors;
  - As regards return policy, the draft should also indicate the amounts from the national budget allocated to voluntary return measures (it only gives the amounts allocated through the Return Fund).

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

#### **SO1 – Asylum**

4. The draft presents essentially the objectives: for some National Objectives (NO) it still does not present clearly the main actions, funding priorities and expected results: on NO1 reference is made only to the funding priorities; for NO3 the information on complementary with other actions funded by national budget which is provided in attached documents should be put in the national programme itself. None of the NO has a clear identification of the targets/expected results. The draft should therefore be revised to better structure the information in terms of objectives, main actions, funding priorities, as well as targets/desired outcomes and results.
5. On National Objective 1 (*Reception / Asylum*)
  - Please clarify which actions will be covered under a) (“Interventi di primissima assistenza nelle operazioni di soccorso in mare comprensiva di triage sanitario e individuazione delle vulnerabilità imm.te rilevabili”) and to what extent possible funding from AMIF would be

coordinated and not duplicate funding also from ISF for such type of actions, as they seem to correspond mainly to tasks pertaining to border management and surveillance; in this context, it would also be important to be more specific as regards activities to be performed (e.g. fingerprinting).

6. On National Objective 2 (*Evaluation*) – Although additional information has been provided, as requested, both in the national programme and in a separate document on the monitoring system, still no much details are given (e.g. on regularity, follow-up etc.) as the draft just mentions the launching of studies and analysis to define standard monitoring methodology. It would be useful to have, if possible, further details on such actions.

### ***SO2 – Integration / Legal Migration***

7. Also in this area the draft should be revised to better structure the information in terms of objectives, main actions, funding priorities, as well as targets/desired outcomes and results.

8. We note that Italy deleted reference to the territorial centres from the NO3, since they would not constitute funding priorities. However, we would like to note that the national programme should be able to give a complete picture of all the measures in the respective policy area, and therefore should contain not only the main actions to be funded by AMIF but also a presentation of the national strategy, objectives, and main actions under each NO to be covered by national resources. Therefore, we suggest that reference is still made in the draft to such centres, even if not as funding priorities.

### ***SO3 – Return***

9. Also in this area the draft should be revised to better structure the information in terms of objectives, main actions, funding priorities, as well as targets/desired outcomes and results.

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

10. The indicative timetable should be completed with information on some actions foreseen in the draft but not included in this section.

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

11. As regards SO3 (*Return*), the target value for the monitoring of removal operations and evaluation of return policies seems quite high, as Italy proposes to monitor 8000 return operations.