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COVER NOTE

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Subject:	COMMISSION STAFF WORKING DOCUMENT EXECUTIVE SUMMARY OF THE EVALUATION Mid-term Evaluation of the Instrument for Financial Support for Border Management and Visa Policy (BMVI) 2021-2027

Delegations will find attached document SWD(2025) 273 final.

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COMMISSION STAFF WORKING DOCUMENT
EXECUTIVE SUMMARY OF THE EVALUATION

**Mid-term Evaluation of the Instrument for Financial Support for Border Management
and Visa Policy (BMVI) 2021-2027**

{SEC(2025) 253 final} - {SWD(2025) 272 final}

BACKGROUND TO THE EVALUATION

The Regulation establishing the Instrument for Financial Support for Border Management and Visa Policy (henceforward “the BMVI”) for 2021-2027 period, was adopted on 21 July 2021. The BMVI was established as the successor of the 2014-2020 Internal Security Fund – Instrument for financial support for external borders and visa (ISF-BV). The BMVI benefits from a significantly larger budget, enabling more comprehensive support to Member States and Schengen Associated Countries. The initial allocation was EUR 6.4 billion, so doubled compared to the initial allocation of EUR 2.8 billion for ISF-BV. Moreover, the BMVI was submitted to the Common Provisions Regulation (CPR), which sets the financial and implementation rules for most EU funds in shared management. This new legal framework introduced more flexible payments, improving financial management and easing administrative burdens. BMVI’s Thematic Facility also offered greater flexibility for responding to crises, such as migration surges.

The BMVI, as its predecessor, has one overall policy objective: “to ensure strong and effective European integrated border management at the external borders, thereby contributing to ensuring a high level of internal security within the Union, while safeguarding the free movement of persons within it and fully respecting the relevant Union *acquis* and the international obligations of the Union and the Member States arising from the international instruments to which they are party.”

This policy objective is articulated through two specific objectives:

1. supporting effective European integrated border management at the external borders, implemented by the European Border and Coast Guard as a shared responsibility of the European Border and Coast Guard Agency and the national authorities responsible for border management, to facilitate legitimate border crossings, to prevent and detect illegal immigration and cross-border crime and to effectively manage migratory flows;
2. supporting the common visa policy to ensure a harmonised approach with regard to the issuance of visas and to facilitate legitimate travel, while helping to prevent migratory and security risks.

The implementation of the programmes in shared management started with some delay, due to the late approval of the Member States’ programmes. Moreover, the implementation context was considerably impacted by several crises, notably the Russian war of aggression in Ukraine, the instrumentalization of migrants by Belarus, and the COVID-19 pandemic. These events have had an influence in the initial implementation of the Instrument.

According to Article 28(1) of the Regulation establishing the BMVI, by 31 December 2024 the Commission should carry out a mid-term evaluation of the Instrument to assess:

- (a) its effectiveness, including the progress made towards the achievement of its objectives;
- (b) the efficiency of the use of resources allocated to the instrument and the efficiency of the management and control measures put in place to implement it;
- (c) the continued relevance and appropriateness of the implementation measures set out in the Regulation;

- (d) the coordination, coherence and complementarity between the actions supported under the instrument and support provided by other Union funds;
- (e) the Union added value of actions implemented under the Instrument.

This document sums up the results of that evaluation. In general, figures and data used for the analysis had 30 June 2024 as a cut-off date. Later developments are in principle not covered by the evaluation.

MAIN FINDINGS AND LESSONS LEARNED

Effectiveness

At different speeds, the interventions funded have been progressing in operational terms. Progress in implementation has been slower for the objective of supporting visa policy than for the support to an effective European integrated border management. This is likely the result of the need to address in the first place the consequences of the Russian war of aggression against Ukraine, in terms of border management and reception capacities.

Following the approval of the Member States programmes by the end of 2022, information on the actual performance was still limited at the end of 2024, insufficient for reaching conclusions in terms of effectiveness. Moreover, the need for the Member States to adapt to a new reporting and monitoring framework explains the still uneven provision of performance data on the implementation of BMVI programmes.

Efficiency

As the information on performance is still insufficient, it is too early to carry out a full cost-effectiveness analysis, but there are indications that financial progress is advancing efficiently. At mid-term, under the BMVI programmes Member States had committed an amount (EUR 1.591 billion) equivalent to the whole initial allocation for 2014-2020 ISF BV for national programmes of Member States (EUR 1.551 billion). However, adjustments are still needed to fully ensure an efficient delivery of the funding and reduce the administrative burden that is perceived as substantial by beneficiaries and Managing Authorities.

With the move to the common frame for shared management under the Common Provisions Regulation, there has been a shift toward a more transparent, accountable, and performance-oriented reporting system, addressing inefficiencies identified in the earlier period. Some beneficiaries and Managing Authorities report that regulatory and monitoring requirements are cumbersome. However, stakeholders indicated that, the administrative burden should be reduced, once they adapt to new regulatory and reporting requirements, as well as new ways of working.

Elements for the promotion of cost-effective practices are embedded at all levels in the Member States' programmes and the Work programmes developed by the Commission for the BMVI Thematic Facility. In this context, based on the available information is premature to draw conclusions on the BMVI operational efficiency.

Some elements may have impacted the efficiency of implementation, notably the need to adapt to the new legal framework, under the Common Provisions Regulation. In addition, there is a limitation in human resources, which remained stable as compared to the previous

programming period, while facing increased available funding, workload, and complexity of the various tasks, as well as a learning process due to new reporting mechanisms and tools.

The existing possibilities to simplify and reduce the administrative workload, in the form of simplified cost options and IT systems for the BMVI funding management, do not seem to have been fully used yet and should be further implemented by Member States.

Relevance

The Instrument is addressing the needs it was meant to address, and it proved its capacity to respond to new challenges and developments in the policy area.

There is general agreement that the Instrument has continued to address the needs reflected in the policy objective of the BMVI: to ensure strong and effective European integrated border management at the external borders (specific objective 1) and support the common visa policy (specific objective 2)

The BMVI has continued to address the most important needs at national and EU level in the border management and common visa policy, even when these needs have evolved during the implementation of the Instrument. The architecture of BMVI, with its four components and its combination of management modes (shared, direct and indirect) has been an asset in terms of flexibility and responsiveness.

Coherence

The Member State programmes and the Commission Work Programmes for the Thematic Facility are fit for purpose and coherent with other national and EU funds. The BMVI's architecture enhances internal coherence by fostering complementarity across components.

Complementarity and synergies are implemented through formal and informal mechanisms, which could still be strengthened. This is particularly so in the case of Union Actions, where a higher uptake of lessons learned could possibly reinforce other elements of implementation.

The BMVI is also coherent with, and therefore supports, the other elements in the EU integrated border management and visa policy.

There is room for reinforcing the awareness of stakeholders regarding the coherence and complementarity of the three funds in the area of home affairs (AMIF, ISF and BMVI). This should contribute optimising the achievement of the respective policy objectives in the interrelated areas of border management, migration and security.

As far as coherence with external spending programmes is concerned, notably the NDICI, enhanced cooperation and coordination on programming both between the Commission services and with EU Member States are needed. There are several challenges in the current funding architecture that should be addressed, including notably: the insufficient alignment of the Union's external migration and security funding with the Union policies in these areas; the persistent challenge to use all existing (policy, funding, investment and other) tools, both at the disposal of the EU and its Member States, in a Team Europe spirit, to use strategically and timely leverage in relation to partner countries in order to improve cooperation on migration and security; the limitations for funding migration- and security-

related actions in third countries, given that most of spending in the external dimension must comply with the criteria for development assistance¹ eligibility.

Finally, the evaluation shows that there is room for reinforcing the potential of BMVI funding to increase the uptake of innovative technological solutions, developed with EU research funding (Horizon Europe) at the level of EU and national programmes.

EU added value

Member States are not excessively dependent on EU funding. National resources continue to play a key role, with BMVI serving as a complementary source of funding. The assessment of the EU added value of BMVI reveals significant contributions across various dimensions.

The BMVI's added value lies in its ability to support projects extending beyond the financial and operational capacities of individual Member States. By fostering cooperation, ensuring compliance with EU standards, and complementing the effort from the national budget, it significantly enhances the EU's collective border management and visa policy framework.

¹ Official development assistance eligibility criteria is set by the Organisation for Economic Cooperation and Development.