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COMMISSION STAFF WORKING DOCUMENT

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) 273 final}

CONTENTS

ABBREVIATIONS

AMIF	Asylum, Migration and Integration Fund
BMVI	Instrument for Financial Support for Border Management and Visa
CCEI	Customs Control Equipment Instrument
CDP	Border and Coast Guard Capability Development Plan
CPR	Common Provisions Regulation (Regulation (EU) 2021/1060)
EBCG	European Border and Coast Guard
ECA	European Court of Auditors
EES	Entry-Exit System
EIBM	European Integrated Border Management
EMAS	Emergency Assistance
EBF	External Borders Fund (2007-2013)
ECA	European Court of Auditors
ERDF	European Regional Development Fund
ESF+	European Social Fund Plus (2021-2027)
ESIF	European Structural and Investment Funds
eu-LISA	European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice
FRONTEX	European Border and Coast Guard Agency
HEC	Horizontal Enabling Conditions (art. 15 CPR)
ICMPD	International Centre for Migration Policy Development
IPA	Instrument for Pre-accession assistance
ISF	Internal Security Fund (2021-2027)
ISF-BV	Instrument for financial support for external borders and visa for the period 2014-2020
MOCADEM	Operational Coordination Mechanism for the External Dimension of Migration
MPF	Migration Partnership Facility

NDICI	Neighbourhood, Development and International Cooperation Instrument
OLAF	European Anti-Fraud Office
RRF	Recovery and Resilience Facility
SA	Specific Action(s)
SACs	Schengen Associated Countries (Iceland, Liechtenstein, Norway, Switzerland)
SFC	IT System for Fund Management in the European Union
SWD	Staff Working Document of the Commission services
TFEU	Treaty on the Functioning of the European Union
TSI	Technical Support Instrument
UA	Union Action(s)
VIS	Visa Information System

1. INTRODUCTION

Regulation (EU) 2021/1148 (henceforward, "the BMVI Regulation") established, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy (henceforward the "BMVI" or "the Instrument") ([1]) for the 2021-2027 programming period.

The BMVI is established for the period from 1 January 2021 to 31 December 2027. It applies to 25 EU Member States (all except Ireland) ([2]) and 4 non-EU countries (Iceland, Liechtenstein, Norway and Switzerland, the so-called Schengen Associated Countries (SACs). Denmark was excepted at in principle ([3]) but chose to implement the BMVI and be bound by it, pursuant to Article 4 of Protocol 22.

The BMVI is one of the three Home Affairs Funds for the period 2021-2027, together with the Asylum, Migration and Integration Fund (AMIF) ([4]) and the Internal Security Fund (ISF) ([5]).

It builds on the results and investments of its predecessors, External Borders Fund (EBF) for the 2007-2013 period - ([6]) and the 2014-2020 Instrument for financial support for external borders and visa as part of the Internal Security Fund for the 2014-2020 period (ISF-BV) ([7]).

According to Article 3(1) of BMVI Regulation, the policy objective of the Fund is to ensure effective European integrated border management at the external borders policy, 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 Union *acquis* and the international obligations of the Union and the Member States arising from the international instruments to which they are party. Withing this policy objective, in accordance with Article 3(2) of BMVI Regulation, it shall contribute to the specific objectives of (a) supporting effective European integrated border management at the external borders, to facilitate legitimate external border crossings, to prevent and detect illegal immigration and cross-border crime and to effectively manage migratory flows; (b) 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.

([1]) Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy

([2]) Protocol (No 19) on the Schengen acquis integrated into the framework of the European Union

([3]) Article 1 and Article 2 of Protocol (No 22) on the position of Denmark

([4]) Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund.

([5]) Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund.

([6]) Decision of the European Parliament and the Council No 574/2007/EC establishing the External Borders Fund for the period 2007 to 2013 as part of the General programme 'Solidarity and Management of Migration Flows'

([7]) Regulation (EU) No 515/2014 of the European Parliament and of the Council of 16 April 2014 establishing, as part of the Internal Security Fund, the Instrument for financial support for external borders and visa and repealing Decision No 574/2007/EC

BMVI (currently EUR 7.7 billion) provides support to achieve its objectives and is implemented under shared, direct and indirect management modes.

Purpose and scope of the Evaluation

This Staff Working Document (SWD) presents the results of the evaluation of the initial implementation of the BMVI (hereafter "the Evaluation").

According to Article 28(1) of the BMVI Regulation, 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.

Given the early stage of implementation of the Member States BMVI programmes, which were only approved end of 2022, the mid-term evaluation is particularly focused on the identification of issues which may affect the implementation of the Instrument, and on ways to reassess the BMVI programmes, if necessary. For this reason, while addressing the main evaluation criteria of relevance, effectiveness, efficiency, coherence, and EU added value, the Evaluation aims less at obtaining final conclusions on the effectiveness and efficiency of the programmes, than at obtaining evidence-based information on:

- Whether the Instrument is addressing the needs it was meant to address, and the impact that new challenges and developments in the policy area have had on the continued relevance of the Instrument;

- Whether the Member State programmes and the Commission work programmes for the BMVI Thematic Facility are fit for purpose and coherent with other national and EU funding instruments, and whether improvements should be introduced;

- Whether the interventions are on track to achieving the stated objectives, at a reasonable cost, and which possible corrections may be introduced during the rest of the implementation of the interventions.

The Evaluation is based on thirteen questions, organised as per five criteria ([8]), as follows:

<u>Relevance</u>

- To what extent does the Instrument address the evolving needs?

([8]) The evaluation questions are developed in Annex III (Evaluation matrix).

- To what extent can the Instrument adapt to the evolving needs?

Effectiveness

- To what extent is the Instrument on track to achieving its objectives?
- To what extent is the monitoring and evaluation framework suitable to inform on the progress towards the achievement of the objectives of the Instrument?
- How was the involvement of the relevant partners ensured across all stages of the programming implementation, monitoring and evaluation?
- To what extent does the Instrument respect or promote in its implementation the horizontal principles?
- To what extent is the Instrument effective in communicating and disseminating on its opportunities as well as achievements?

Efficiency

- To what extent does the Instrument support cost-effective measures?
- To what extent is the management and control system efficient?
- To what extent is further simplification achievable? How?

Coherence

- To what extent is the Instrument coherent with initiatives supported under its policy domain, in particular with support under the BMVI Thematic Facility across the different management modes?
- To what extent is the Instrument coherent with other EU funds (including other Home Affairs Funds) and in particular with EU's external action?

EU Added Value

- To what extent is the Instrument generating EU added value?

The information used for the Evaluation cover the period from 1 January 2021 (the date when the BMVI Regulation become applicable), to end of June 2024, except where otherwise indicated.

The geographical scope includes all countries to which the BMVI Regulation applies, i.e., all Member States except Ireland, as well as the four Schengen Associated Countries (henceforward "SACs"): Norway, Switzerland, Iceland and Liechtenstein.

Following the requirements in the BMVI Regulation ([9]), the Evaluation is based on evidence obtained from several sources, including:

([9]) Article 28.

- the output and result indicators defined in Annex VIII to the BMVI Regulation, which are regularly reported to the Commission by the Managing Authorities,

- the BMVI annual performance reports submitted every year, since 2023, by the Member State Managing Authorities for the BMVI programmes,

- the BMVI mid-term evaluations done by the Member States by 31 March 2024, according to Article 44(5) of the Common Provisions Regulation ([10]) (henceforward, "the CPR"),

- the impact assessment accompanying the 2021-2027 Home Affairs Funds Regulations proposals, including the BMVI ([11]),

- other studies, sources and reports, such as reports following BMVI funding allocated under direct and indirect management, and from the European Court of Auditors, which provided useful information for the evaluation.

As the Commission was also requested to provide an ex-post evaluation report of the Instrument for financial support for external borders and visa (henceforward, the ISF-BV) for the period 2014-2020 ([12]) by June 2025, the Commission decided to carry-out both evaluations of ISF-BV (ex-post) and BMVI (mid-term) simultaneously, in order to facilitate the exchange of information and the use of common findings and analysis.

The preparatory work for this Evaluation was confided to an external consortium led by EY France and it was carried out in the timeframe February - December 2024. The methodology applied started with a comprehensive analysis of initial and emerging needs. The study used: qualitative and quantitative methods, including desk review of EU and national documents, EU-level interviews with various stakeholders, such as European Commission's officials, implementing partners and beneficiaries, as well as surveys. It included data analysis covering country focused and thematic case studies. The data collected were triangulated to validate consistency across sources and provide well-founded insights and responses to the evaluation questions.

Limitations

The data collection and analysis processes faced several limitations which have an impact on the mid-term evaluation of BMVI, notably:

- Inconsistent data quality and availability ([13]) across Member States hindered comparisons;

([10]) Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

([11]) SWD(2018) 347 final

([12]) Article 21(6) of Regulation (EU) No 515/2014 of the European Parliament and of the Council of 16 April 2014 establishing, as part of the Internal Security Fund, the Instrument for financial support for external borders and visa and repealing Decision No 574/2007/EC.

([13]) The reduced availability of data was due partially to the early implementation stage of BMVI programmes of Member States upon their approval, as well as to the specificities of certain border

- Historical data was often incomplete, and some data errors in the IT System for Fund Management in the European Union (SFC) added to the challenges;

- Variations in data granularity and maturity of BMVI programmes, as Member States were at different stages of BMVI Regulation implementation;

- Difficulty of stakeholders distinguishing BMVI data from the predecessor 2014-2020 ISF-BV data;

- Low response rates in the surveys;

- Additionally, due to conceptual issues with certain common output and result BMVI indicators it was difficult to accurately measure the BMVI programmes' progress achieved so far.

2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

2.1. Description of the intervention and its objectives

The European Union (hereafter "the EU" or "the Union) has a key role to play in the development of an integrated management system and a common visa policy to secure the external borders from any unauthorised crossings, also by providing support to the Member States for checks on persons and efficient external borders surveillance, while preserving the Schengen Area and the free movement of persons within the Union.

As concluded in the impact assessment ([14]) that accompanied the legislative proposals for the three 2021-2027 Home Affairs Funds Regulations ([15]), during the implementation of the previous generation of funds, there had been a number of crises that deeply affected the fields of migration, border management and security. Member States' resources and capabilities for border management and visa were put under pressure due to the considerably increased migratory challenges, irregular border crossings and visa applications, as compared to the previous years. At the same time, according to the impact assessment, security concerns and climate change would continue to act as catalysts of the identified large-scale, cross-sectoral and cross-border challenges EU and its Member States face. In the case of border management particularly, the need to protect the functioning of the Schengen Area required a reinforced and comprehensive response to the management of Union's external borders.

The BMVI impact assessment concluded that the objectives of the Instrument should be "based on the scope of ISF-BV, which is considered sufficiently broad to support the implementation of Union policy priorities, providing EU added value." Therefore, the BMVI aligns with the objectives of the ISF-BV ([16]).

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management activities, whose completion requires longer periods than 3.5 years (e.g. the procurement of high quality, standardized, large-scale border surveillance equipment, the development of large-scale IT systems across EU and BMVI countries, etc.)

([14]) SWD(2018) 347 final.

([15]) The Asylum, Migration and Integration Fund (AMIF), the Integrated Border Management Fund (including the BMVI and the Customs Control Equipment Instrument (CCEI)) and the Internal Security Fund (ISF).

([16]) See the Article 3 of the ISF BV and BMVI Regulations.

The **policy objective** of the BMVI is "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." To this end, two specific objectives were defined, mirroring those for the ISF-BV:

> **Specific Objective 1 (SO1)**: 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;
>
> **Specific Objective 2 (SO2)**: 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.

To address the needs described above, the BMVI intervention was developed as follows (the complete intervention logic, presented as a diagram, is included in Annex II):

Operational objectives: The operational objectives of **SO1** focus on the implementation and improvement of the European integrated border management at the external borders; the development of the European Border Coast Guard and cooperation of Frontex agency with Member States; the enhancement of inter-agency cooperation at national, EU and international levels; increasing available capacities and capabilities, also by means of innovative solutions, based on new technologies; and support to search and rescue operations in situations that might rise during border surveillance operations at sea. The operational objectives for **SO2** are to enhance efficient, secure and client-friendly visa services; support Member States in issuing visas; and enhance consular cooperation between Member States. In addition, the development and enhancement of relevant ICT systems, including of large-scale IT systems and the interoperability architecture for home affairs, as well as of the related infrastructure and equipment, are applicable to both BMVI specific objectives.

Activities: To achieve the operational objectives, the activities supported by the Instrument include, but are not limited to, supporting the development and maintenance of IT/communication systems, development of infrastructure, purchase of equipment, organisation of trainings, exchange of best practices, deployment of experts, communication activities, and operating support ([17]).

Outputs: The immediate outputs of such activities include, but are not limited to: upgraded or new facilities for border crossing points at external borders, new equipment to carry out border management activities, new/upgraded/maintained ICT systems, the deployment of immigration liaison officers in third countries to combat illegal immigration to EU, support to border management personnel and to staff deployed to Member States consulates in

([17]) 'Operating support' means a part (up to 33 % of the amount allocated to a Member State's programme) which may be used as support to the public authorities responsible for carrying out the tasks and providing the services which constitute a public service for the Union (Art. 2(9) BMVI Regulation).

third countries, the set up and running of hotspots in areas with high migratory pressure, cooperation projects with third countries, as well as the digitalisation of visa processing.

Results: The expected results include an integrated management of the EU external borders, enhanced capacity of the European Border and Coast Guard as a whole, enhanced inter-agency cooperation between authorities responsible for border control and other tasks carried out at the external borders (such as, customs control, return of third country nationals, compliance with fundamental rights, multipurpose maritime operations, sanitary control measures, etc.), ICT systems run smoothly, infrastructure built, upgraded or maintained, facilitation of legitimate travel and improved cooperation among Member States for visa processing, overall progress towards uniform application of the Union's acquis on borders and visa.

Impact: The BMVI aims to leave a lasting impact by contributing to effective integrated management of the Union's external borders, thereby contributing to a high level of internal security and supporting the free movement of persons within it.

To address the need for additional flexibility in dealing with critical situations, such as the 2015 refugee crisis, and in line with the two other Home Affairs funds, the Instrument included a Thematic Facility "to adapt the allocation of funding to changes in priorities for visa policy and border management, including changes that result from increased pressure at the border, and a need to steer funding towards the priorities with the highest Union added value" ([18]). The three pre-existing fund components under ISF-BV of Emergency Assistance ("EMAS"), Unions Actions ("UA") and Specific Actions ("SA"), were regrouped under the BMVI Thematic Facility, enabling the Commission with the necessary flexibility in the management of the BMVI to address the Union priorities, key actions with high EU added value and to respond to urgent needs (e.g. to prevent and detect cross-border crime at the external borders, in particular migrant smuggling and trafficking in human beings, to manage migratory flows, etc) ([19]).

To further develop a coordinated and harmonised implementation of Union Funds implemented under shared management ([20]), the BMVI, as well as the AMIF and the ISF, were subject from 2021 to the general provisions for shared management funding defined by the Common Provisions Regulation ([21]) (henceforward, "the CPR"). This shift addressed both the challenge of enhancing coherence and synergies with other EU funds, introducing flexibility and simplification in the financial aspects and led the way to a reinforced focus on performance, with a more regular reporting on outputs and results, and the promotion of performance-based tools, such as financing not linked to costs.

The BMVI objectives were translated into a series of implementation measures and fields of intervention ([22]), linked to specific Member States and SACs reporting obligations on their BMVI programmes under shared management. Reinforced reporting shows a strong

([18]) Recital 46, BMVI Regulation.
([19]) Article 8(1) BMVI Regulation.
([20]) Recital 2 of the CPR Regulation.
([21]) Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.
([22]) Annex III and VI BMVI.

commitment on financial and performance monitoring, and an effort towards external transparency through the publication of data in the Open Data Platform of the Commission.

2.2. Points of Comparison

EU funding for border management and visa policy has developed over several funding periods, following the EU strategies and policy developments for border management and visa policy, with a high level of continuity. Given this, and the early stage of delivery, it is hard to delineate where results from one funding period begin and end, as there are also differences across Member States and external factors that contributed to progress (or to the lack thereof on some aspects). As such, it is useful to highlight the main structural differences between the BMVI and ISF-BV, starting with the allocation of funds. This is complemented by the different elements for assessing the performance of the BMVI against its predecessor instrument ISF-BV, and other points of comparison (i.e. comparative progress across Member States, impact of external factors and comparisons with similar EU funds).

The challenges identified by the previous impact assessment

For the post 2020 period, four main challenges, applicable to all Home Affairs Funds, were identified by the impact assessment:

1. Enhancing flexibility within a stable framework
2. Further simplifying the rules for implementing EU Funds
3. Ensuring more coherence and synergies between actions supported by EU funding instruments
4. Achieving the highest level of EU added value with a focus on performance

The extent to which these challenges have been addressed is assessed in the sections on findings and conclusions.

Comparison with 2014-2020 ISF-BV

Possibly the most obvious point of comparison is the performance of the BMVI compared to ISF BV - although due note must be taken of the differences between the two in terms of resources allocation decisions and delivery before arriving at conclusions.

Increased funding for BMVI compared to ISF-BV

BMVI benefits from a significantly larger financial envelope compared to its predecessor. With a total initial EU contribution of EUR 6.4 billion ([23]) for the 2021-2027 programming period, which has increased since 2021 to EUR 7.7 billion ([24]), the level of funding is more than two-and-a-half times larger than the total budget of the predecessor programme ISF-

([23]) According to Article 7 of the BMVI Regulation, the financial envelope for BMVI 2021-2027 is EUR 5,241,000,000 in current prices. This amount is increased by an additional allocation, as provided for in Article 5 and Annex II of Regulation (EU, Euratom) 2020/2093.

([24]) The amount includes the additional allocation, as provided for in Article 5 and Annex II of Regulation (EU, Euratom) 2020/2093, the transfers Article 26 of the CPR, all transfers to and from Agencies as well as the additional amounts received in the context of the Budget Procedure.

BV over its seven years of implementation ([25]). This is meant to allowin for expanded and more comprehensive support to the Member States and Schengen Associated Countries. In the Evaluation, this increased funding is assessed against the scale of border security and migration challenges faced by the EU during the evaluation period. The comparison assesses whether the additional resources have been effectively allocated to address new challenges, such as technological advancements in border security, as well as increased migration pressures, while identifying areas where resource allocation may still be uneven across Member States.

Legal framework

A significant point of comparison is the shift in the legal framework governing the BMVI, particularly regarding the payment of expenditures incurred by the Member States under shared management, and the fact that it is governed by the Common Provisions Regulation ([26]), which means – among others – a new framework for monitoring the performance in the implementation of the Member States programmes. Under the ISF BV, reimbursement of expenses was the primary method of funding, with one yearly payment application per Member State programme. The BMVI introduced a more flexible system of payments, allowing for pre-financing and advance payments, notably up to six payment applications of Member States per programme, thus accelerating the disbursement of funds and easing the administrative burden on Member States. This study assesses the extent to which these structural changes have improved financial management and implementation efficiency across the Member States BMVI programmes, particularly for EU external borders under high-pressure, e.g. due to with large migration flows (see, in particular, the assessment of efficiency).

The performance framework

The new legal framework also entailed a refocus on performance. The reporting and monitoring framework was reinforced with the introduction of the requirement for Member States to establish a performance framework pursuant to Article 16 CPR, to allow monitoring and evaluating of programme performance during implementation of the programme, and to contribute to measuring the overall performance of the Funds. The performance framework consists of (a) output and result indicators (b) milestones to be achieved by the end of year 2024 for output indicators and (c) targets to be achieved by the end of the year 2029 for output and result indicators. Targets and milestones ([27]), also allow the Commission and the Member States to measure progress towards the achievement of the specific objective ([28]). Pursuant to the BMVI Regulation ([29]), common output and result indicators to report the progress of the Instrument towards the achievement of the specific objectives set out in Annex VIII of the BMVI

([25]) ISF BV initial EU financial envelope was EUR 2.760 billion, out of which the allocation to Member States and SACs programmes was EUR 1.276 billion. As per January 2025 data, the EU budget for ISF BV was ultimately EUR 2.904 billion in total, out of which EUR 2.420 billion for Member States and SACs ISF BV programmes.

([26]) Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy

([27]) As defined in Article 2(11) and (12) of the CPR, respectively

([28]) Article 16(3) of the CPR

([29]) Article 27(3).

Regulation. The baseline for output indicators was set at zero at the beginning of the programming period; The result indicators concerning the operations funded were also set as zero as they were linked to the output indicators. ([30]).

The definition of targets belongs the Member States in the light of the strategy translated into the programme. They explain in their programmes the methodology used for target-setting. Member States defined them on the basis of their own needs and strategic priorities, and not as a contribution to an overall EU target. Both output and result indicators are linked to the implementation of interventions. This practice is in line with the one in other CPR regulated funding and allows for a close monitoring of the implementation and performance of the programmes. In order to ensure homogenous reporting and facilitate aggregation at EU level, even before the negotiation on the Member State programmes, the Commission provided the Member States with a metadata set, with a standardised definition of each indicator in the performance framework. This will allow to aggregate targets and results at EU level in order to assess overall progress when it comes to the retrospective evaluation.

This approach does not allow to compare progress in indicators with the evaluation and performance framework defined for the previous period, which was based on a different set of indicators and different performance setting.

A Thematic Facility responding promptly to challenges at EU external borders

The BMVI Thematic Facility is meant to offer greater flexibility compared to ISF-BV ([31]) and a more dynamic allocation of funding. While assessing the internal coherence of the BMVI (including its Thematic Facility), the Evaluation examines how effectively this Facility has been used to address unexpected crises, such as the rapid increase in migration flows, or the need for urgent infrastructure upgrades at border crossings points, and whether it has contributed to more equitable and strategic resource distribution among Member States (see assessment of relevance, effectiveness, and internal coherence).

Comparative Progress Across Member States

Given the shared responsibility of Member States in implementing the BMVI, comparisons were drawn between different countries' implementation rates. Countries with significant external borders (e.g., Greece, Italy, Spain) were assessed against those with less exposure to migration pressures, to determine if resources and efforts have been effectively allocated in proportion to their needs. Section 3 evaluates disparities in Member States programmes delivery, such as delays or accelerated progress in border management and visa policy reforms, identifying patterns of implementation success or obstacles across various regions.

([30]) Article 27(3) of the BMVI Regulation. Four of the indicators cannot be directly linked to the projects and are derived from general national statistics, these indicators are: O.1.13. Number of persons who have applied for international protection at border crossing points; R.1.17. Number of border crossings through automated border control systems and e-gates; R.1.20. Number of persons refused entry by border authorities; and O.2.1. Number of visa applications using digital means.

([31]) The possibility to provide for emergency assistance under all management modes under BMVI, including shared management, for instance, compared to emergency assistance provided under direct management only under ISF BV

3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD

3.1. Evolution of the policy context

The initial implementation of the Instrument was substantially affected by addressing the lessons learned from Covid-19. It was also impacted by the policy and legal developments determined by various crises triggered by the geopolitical challenges in the EU neighborhood, notably those linked to the Russian war of aggression on Ukraine, and the mass arrivals of persons under the Temporary Protection Directive ([32]) regime. This created an unforeseen pressure at the borders in a number of Member States, scaling up fast on the short-term the resources needed for the management of EU Eastern borders, while on the longer term this had an impact on several Member States. This happened at a time when BMVI programmes had not yet been adopted, and it was not possible to deploy the new funds to address the situation. Similarly, the instrumentalization of migrants by Belarus led to historically high migration flows into the Baltic Member States. To support the Member States, as explained below, the Commission needed to mobilize quickly support in the form of emergency assistance and Specific Actions.

In more general terms, detections of irregular border crossings kept increasing through the first years of implementation. Even with a reduction of 38% in 2024 ([33]), irregular migration is and will continue to be the main risk ([34]). In the case of border management, this was compounded by a return to normal of regular arrivals, after the restrictions imposed by the COVID-19 pandemic, which facilitated mobility at all levels, and included the rapid recovery of air passenger demand to pre-pandemic levels.

This return to normal also impacted the level of cross-border crime activities, which took advantage of this facilitated mobility to go back to higher than pre-pandemic levels of crime. This notably includes an increase in migrant smuggling activity and the diversification of the *modus operandi* of smugglers. For instance, through the sea routes, means used for smuggling irregular migrants have diversified and have become less dependent on seasonality, with the corresponding impact on border surveillance activities ([35]).

([32]) Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof

([33]) https://www.frontex.europa.eu/media-centre/news/news-release/irregular-border-crossings-into-eu-drop-sharply-in-2024-oqpweX

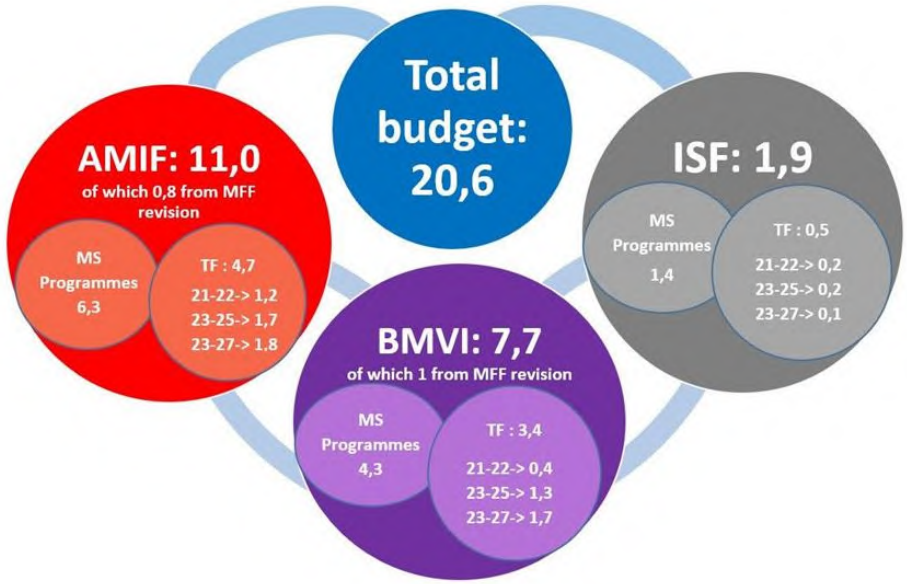
([34]) FRONTEX. Annual Risk Analysis 2024/2025. May 2024.

([35]) FRONTEX. Risk Analysis for 2023/2024, at https://www.frontex.europa.eu/assets/Publications/General/ARA_2023.pdf

3.2. Description of the Implementation Set-up

The BMVI is one of the three EU Home Affairs Funds for the 2021-2027 period, which altogether amount to EUR 20.6 billion ([36]).

Figure 1: Total budget for the three EU Home Affairs Funds

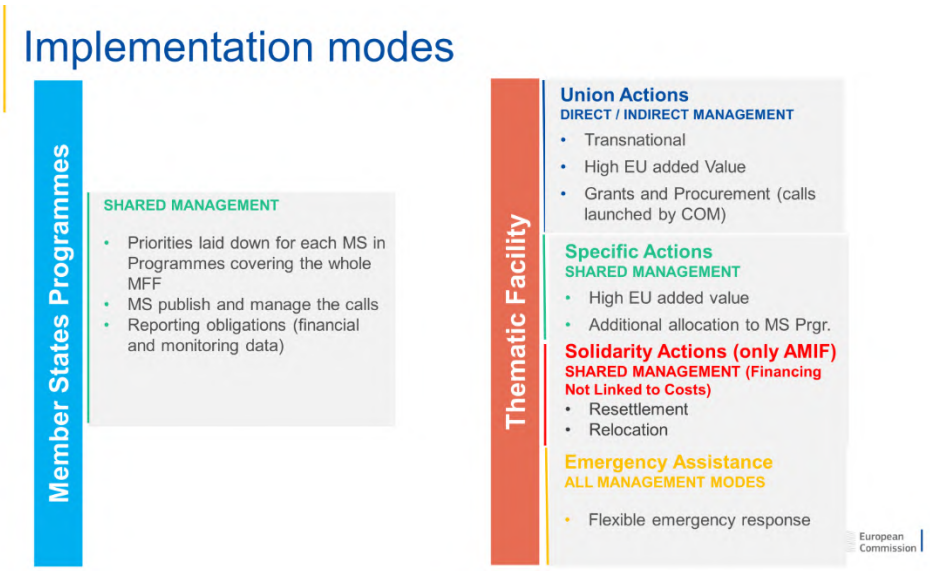


The BMVI is implemented through shared management, direct management and indirect management ([37]). The programming occurs at the Member State level, through the 2021-2027 Member State Programmes, or at the Commission level, through the multi-annual BMVI Thematic Facility Programme.

The BMVI components of the Thematic Facility are identified as follows: Specific Actions, Union Actions and Emergency Assistance (henceforward EMAS) ([38]).

([36]) As of 22 November 2024.
([37]) For an explanation of the terminology in this chapter, please refer to https://commission.europa.eu/funding-tenders/find-funding/funding-management-mode_en#shared-management
([38]) Article 8 of BMVI Regulation.

Figure 2: Implementation modes of the EU budget



Shared management receives the largest share of the initial BMVI financial envelope. This is valid in relation to the initial financial envelope and the current EU budget for BMVI. The initial EU financial envelope of BMVI amounted to EUR 6.3 billion, out of which EUR 3.7 billion for the Member State programmes (58%), including the amount envisaged for the mid-term review ([39]), and EUR 2.6 billion for the BMVI Thematic Facility ([40]). Currently, the BMVI EU total amount is EUR 7.7 billion, out of which EUR 4.3 billion ([41]) for the Member States programmes (56%) and EUR 3.4 billion for BMVI Thematic Facility.

Having this EU support, Member States developed their BMVI programmes to respond to EU priorities through the implementation measures listed in Annex II and the support set out in Annex III of the BMVI Regulation. Pursuant to Articles 38 to 40 of the CPR, to implement the Member States' programmes, Member States had to establish the composition and functions of the Monitoring Committee which has a significant role in the monitoring the implementation of Member States BMVI programmes. The Commission follows the implementation of shared management by examining the BMVI annual performance reports and the cumulative data Member States submit on financial and operational progress during each year (data on operational progress is reported five times a year and financial data twice a year), while payment applications may be submitted up to six times per year ([42]).

([39]) EUR 611 million, as per Articles 10 and 14 of BMVI Regulation

([40]) Additional resources stemming from the BMVI Thematic Facility are allocated (as Specific Actions and, possibly, EMAS) to the Member State programmes and implemented through shared management throughout the programming period.

([41]) This amount does not include the contribution of the Schengen Associated Countries and the mid-term review additional amounts to be allocated to the BMVI programmes as per Article 14 of the BMVI Regulation.

([42]) Articles 41 and 42 of the CPR Regulation.

Table 1: Overview of budget programming for BMVI (as of 22 November 2024), billion EUR

Total ([43]), *of which:*	***- for Member States programmes* ([44])**	***- for the Thematic Facility* ([45])**			
		Total	2021-2022	2023-2025	2026-2027
7,7	4,3	3,4	0,4	1,3	1,7

The Thematic Facility allows for a more flexible allocation of resources to address priorities with a high Union added value and to respond to urgent needs or emerging threats. The amount available under the BMVI Thematic Facility is allocated in Multiannual Work Programmes which are established by the European Commission in agreement with Member States' representatives and in consultation with relevant stakeholders. This flexibility ensures that both, national and EU-wide priorities, can be addressed efficiently while maintaining a high level of responsiveness to new developments. Resources from the Thematic Facility can be implemented as Union Actions (in direct or indirect management), provided as Emergency Assistance or channelled to the Member States' programmes via Specific Actions implemented in shared management.

The actual implementation of the funds in shared management was delayed due to the long negotiation of the Member State programmes to meet the various policy objectives and legal obligations, including of the CPR. As a result, they were only approved by the end of 2022. As explained in later sections, a number of factors played in this delay, not least the need to immediately make funding available to Member States to face the consequences of the war in Ukraine.

International agreements within the meaning of Article 218 TFEU between the Schengen Associated Countries and the Union had to be concluded so that Norway, Iceland, Switzerland and Liechtenstein participate to the 2021-2027 BMVI ([46]), as they did in the previous similar funding instruments. The agreements concluded between the Union and the SACs ([47]) lay down the supplementary rules applicable to these third countries, enabling them to contribute to and benefit from the BMVI. In the current set-up, negotiations on the supplementary agreements can only start after the formal adoption of the Home Affairs Funds Regulations. The participation of the SACs is not directly based on the BMVI Regulation, but on the Association Agreements these four countries (Norway, Switzerland, Iceland, Liechtenstein) signed with the Union following the integration of the Schengen acquis into the framework of the European Union, in

([43]) Including additional allocations of EUR 1,1 billion agreed in November 2020 and the allocations to the Schengen associated countries

([44]) Member State envelopes include the amounts foreseen under the mid-term review as well as various transfers between funds.

([45]) Including Mid-term Review of the MFF, ie. EUR 0,8 bn for AMIF and EUR 1 bn for BMVI.

([46]) Art. 7(6) BMVI Regulation.

([47]) Agreement between the European Union and the Kingdom of Norway – OJ 2024/1592; Agreement between the European Union and Iceland – OJ 2024/1591; Agreement between the European Union and the Swiss Confederation - OJ 2024/1292; Agreement between the European Union and the Principality of Liechtenstein – OJ 2024/200;

accordance with Protocol 19 to the TFEU. Negotiations tend to be complex, and the formal adoption and ratification process of such agreements are lengthy. This explains why by the end of 2024 the Commission could not approve the BMVI draft programmes of the SACs ([48]) and why the implementation of the BMVI is not very advanced in these countries.

3.3. BMVI Implementation - Financial Progress

The initial financial envelope of the BMVI was EUR 6.3 billion. Since the adoption of the BMVI, the financial envelope has increased to EUR 7.7 billion by the end of 2024. The increase is a result of transfers from the Structural Funds, income from fines, unused appropriations from the Justice and Home Affairs agencies, various budgetary procedures and the mid-term revision of the 2021-2027 Multiannual Financial Framework. ([49])

Member States' programmes – Shared Management ([50])

As of 30 June 2024, planned resources ([51]) in shared management amount to EUR 4.225 million (including technical assistance which is a flat rate of 6% applied to all eligible expenditure included in payment applications ([52])). Operations under SO1 represent a larger share than those under SO2.

([48]) Out of the 4 Schengen Associated Countries, Liechtenstein is not implementing BMVI under shared management mode.

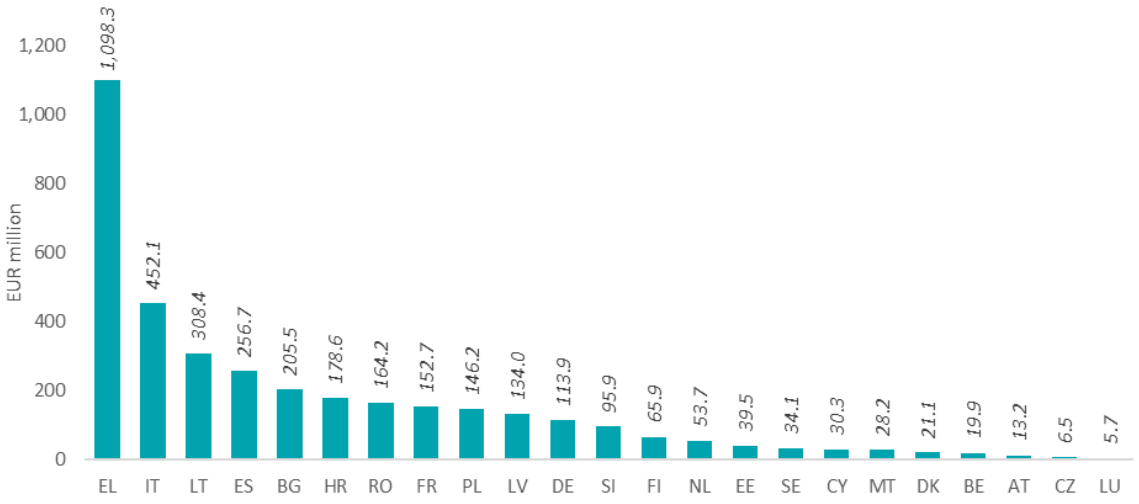
([49]) Through this document, the following terminology is used when it comes to financial progress:
Implementation rate: the ratio of commitments to concrete operations over allocated funds. It measures progress in terms of operations selected.
Absorption rate: the ratio of costs declared per allocated funds (at the closure of given operations, this will correspond to the ratio of payments per allocated funds, once possible pre-payments, recovered amounts are accounted for). The absorption rate measures progress of concrete operations.

([50]) Unless otherwise mentioned, all figures and data are referred to the cut-off date of 30 June 2024.

([51]) Planned resources refers to the initial allocation made at the programming stage. At the Commission level, these planned resources are based on the latest adopted versions of the Thematic Facility work programmes. This includes resources allocated for Union Actions, Specific Actions and Emergency Assistance. At the Member State level, planned resources are derived from the latest version of the adopted Member State programmes, reflecting allocations implemented via shared management, with the exclusion of Specific Actions to avoid double counting.

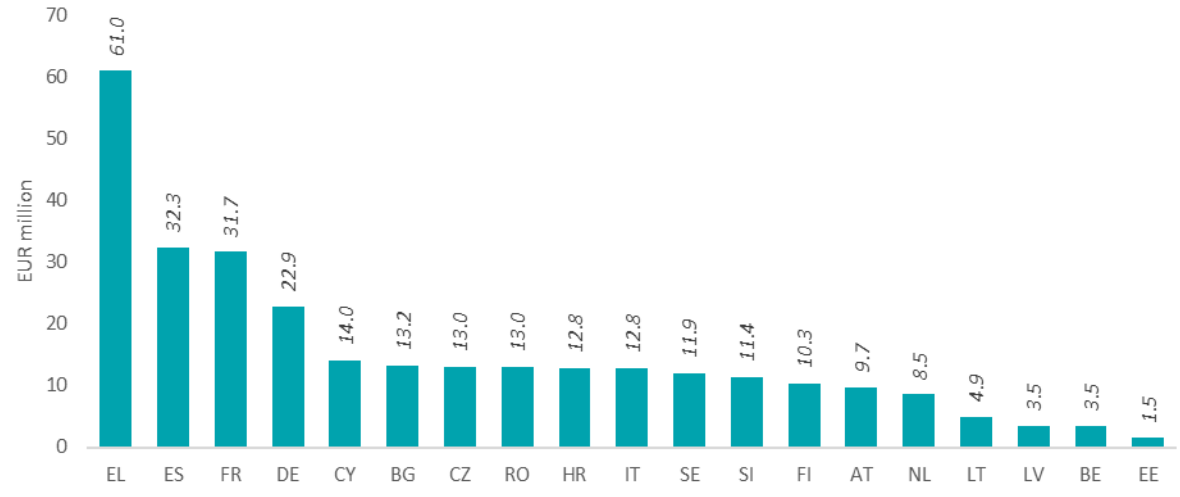
([52]) Article 36(5) of the CPR Regulation.

Figure 3 - Allocations to Member States' national programmes under SO 1 (EUR million, status 30 June 2024)



Source: European Commission - SCF2021 data

Figure 4 - Allocations to Member States' national programmes under SO2 (EUR million, status 30 June 2024)



Source: European Commission - SCF2021 data

The rate of committed resources ([53]) in shared management is 31% for SO1 and 28.1% for SO2. The absorption rate is 5.2% for SO1 and 3.7% for SO2. The low absorption rate at that point in time demonstrates that Member States we still in the early stages of BMVI

([53]) Committed resources represent, in broad terms, the commitment of resources to the beneficiaries, i.e. to those responsible for initiating/ implementing the operations. In shared management, this corresponds to the eligible cost of operations that have been selected for support by the Managing Authorities. For direct and indirect management, it corresponds to the value of grants, contracts or agreements with beneficiaries, contractors and partner entities.

implementation. This is in line with the information provided in the Member States BMVI mid-term evaluations and annual performance reports.

Table 2 – Shared management allocations, commitments, costs declared (June 2024)

Specific Objectives	Allocated Resources	Committed Resources	Costs declared	Implementation rate (%)	Absorption rate (%)
SO1 - borders	4 303 319 490	2 571 978 333	306 633 447	59.8	7.1
SO2 - visa	367 712 530	184 516 326	22 005 339	50.2	6.0
	4 671 032 019	2 756 494 659	328 638 787	59.0	7.0

The Member States with the highest amounts for SO1 (integrated border management), including regular actions, specific actions and operations support, are: Greece (EUR 1 098 million), Italy (EUR 452 million), Lithuania (EUR 308 million) and Spain (EUR 257 million). This reflects their important position in EU external border management.

Whereas for SO 2 (visa policy), the Member States with the highest amounts are Greece (EUR 61 million), Spain (EUR 32.3 million) and France (EUR 31.6 million). This aligns with the reality that France and Spain are the Member States that receive the most short-stay visa applications ([54]). Member States are required to allocate minimum 10% of their BMVI programme funds to SO2 ([55]), nonetheless this objective is clearly less prioritised in the Member State programmes.

Member States may receive additional funds to their programme to implement targeted Specific Actions with the BMVI Thematic Facility support. Of the 15 Specific Actions launched by 30 June 2024, 14 were under the scope of SO1 and one was under the scope of SO2.

Under SO1, the Specific Action with the largest available budget was the call for the large-scale border surveillance equipment for Frontex national components, purchased under BMVI by the Member States and to be put also at the disposal of the agency. This Specific Action resulted in awarding EUR 201.1 million to 12 Member States. Other notable Specific Actions under SO1 include the allocation of EUR 185 million to enhance border surveillance in the countries neighbouring Belarus, in response to its instrumentalisation of migration in 2021, and EUR 141.2 million for electronic surveillance systems at the EU external land borders.

Regarding the Specific Action under SO2 for the digitalization, consular cooperation, and other related actions, the Netherlands received EUR 1.5 million to accelerate and digitalise the visa application process, while Sweden received EUR 1.26 million to develop a common EU visa training.

Annex VI of the BMVI Regulation details the fields of intervention. Within SO1, the largest share of resources has been planned for border surveillance (23.9% of planned resources). Also noteworthy is the amount of resources planned for large-scale IT systems. In contrast, the intervention fields for inter-agency cooperation draw less interest, with only five Member States allocating funds. The lowest amount of planned resources refers

([54]) Short-stay visas issued by Schengen countries 2022, Short-stay visas issued by Schengen countries - European Commission

([55]) Article 13(2) of the BMVI Regulation

to the intervention fields for data quality and data subjects' rights to information and measures related to the identification and referral of vulnerable persons. For three fields of intervention, no data has been reported thus far. ([56])

Under SO2, the most reported intervention fields are large scale IT systems – Visa Information System and other ICT systems for visa application processing purposes, which respectively have 28% and 15% of the total planned resources for SO2. In contrast, the intervention fields related to consulates have consistently received less planned resources.

Union Actions - Direct Management

As of 30 June 2024, the Commission approved nine Union Actions (including the Union Action for Liechtenstein) under the BMVI Thematic Facility for transnational projects or projects of particular interest to the Union. They involve 10 Member States, Liechtenstein and the International Organization for Migration (IOM). In total, the resources granted for BMVI direct management amount to EUR 10.3 million.

Due to Liechtenstein's small allocation in the 2021-2027 programming period and the administrative burden of implementing a programme under the CPR, it was decided to support Liechtenstein's compliance with the Schengen *acquis* through grants under direct management, than a programme under shared management ([57]).

Union Actions – Indirect Management

Under indirect management the BMVI Thematic Facility supports projects through the Migration Partnership Facility (henceforth MPF). MPF is managed by the International Centre for Migration Policy Development (ICMPD) and aims to strengthen dialogue and cooperation on migration and mobility issues between EU Member States and partner countries. MPF is supported by AMIF, BMVI and ISF Thematic Facility Programmes; however table 3 only shows the contribution from the BMVI Thematic Facility.

Table 3: MPF projects for the 2021-2027 programming period as of 30 June 2024

Member State & third country	Project title	Commitment year	EU contribution committed (EUR)	Status
LV, MD	Strengthening the capacity of the General Inspectorate of the Border Police of the Republic of Moldova in "green" and "blue" border control (LatMoldova)	2023	323 443.18	Awarded

([56]) Measures related to the identification and referral of persons who are in need of, or who wish to apply for, international protection; Large-scale IT systems – Eurodac for border management purposes; and Large-scale IT systems – European Travel Information and Authorisation System (ETIAS) – Article 85(3) of Regulation (EU) 2018/1240 have not been reported on in the Transmission of Data as of 30 June 2024

([57]) Agreement between the European Union and the Principality of Liechtenstein on supplementary rules in relation to the Instrument for Financial Support for Border Management and Visa Policy, as part of the Integrated Border Management Fund, for the period 2021 to 2027

SE, BA	Visa Capacity Building in Bosnia and Herzegovina (VCBB)	2023	1 142 548.51	Awarded

A third project, "Enhancing the Border Management Capacity of the Presidency of Migration Management (ENGAGE)", with a budget of EUR 10 million from the BMVI Thematic Facility budget, implementing a collaboration between ICMPD, the Commission and Türkiye with the aim of strengthening Türkiye's border management in line with the European Integrated Border Management standards, has been recently approved (after the cut-off date for the study).

EMAS

In response to the Russian war of aggression towards Ukraine, four EMAS projects were granted to assist the Member States dealing with an exceptional amount of pressure resulting from the high arrival of displaced Ukrainians arriving via the land borders. The EMAS projects concerned Poland (EUR 76.2 million), Romania (EUR 27 million), Hungary (EUR 11.5 million) and Slovakia (EUR 9.3 million). A fifth EMAS project was granted (EUR 17,490,149.49) with the aim of assisting Spanish authorities following the surge in irregular migration flows to the Canary Islands by strengthening their capacity to identify and assist irregular migrants arriving to the Islands. Finally, a sixth project was granted to the Finnish Border Guard (EUR 15,999,999.97) to support further efforts to counter illegal migration at the external border and return border crossing traffic back to normal considering the unprecedented number of people seeking international protection at the eastern border with Russia ([58]). All the above-mentioned BMVI EMAS projects are implemented under direct management.

4. EVALUATION FINDINGS

4.1. To what extent was the intervention successful and why?

4.1.1. Effectiveness

Given the late start of the implementation of the BMVI, the Evaluation is not in a position to provide an assessment on the effectiveness of the Instrument. This limitation was foreseen when defining the evaluation questions, which in the case of effectiveness aimed at ascertaining whether the funding was on track to the achievement of the objectives at the end of the programming period.

Nonetheless, the evidence obtained indicates that **BMVI has made financial progress in some activities under SO1 (integrated border management), reflecting the strong commitment of Member States to enhance border control. Financial progress under SO2 has taken a slower start.**

([58]) This EMAS project was awarded in October 2024 and signed in November 2024, and is therefore out of the scope of this evaluation for the data analysis for which the cut-off is 30 June 2024, nonetheless it is worth mentioning this project in the state of play.

Under SO1, implementation rates have progressed the most in four fields of intervention by mid-2024 ([59]:

- Special Transit Scheme (72.7%),
- Procurement of equipment for border surveillance (67.4%),
- Operating support for border management (44.8%),
- Establishment of large-scale IT systems (39.8%).

The implementation rates for the Special Transit Scheme and equipment for border surveillance are significantly higher than for other types of interventions.

Figure 5: Implementation and absorption rates for SO1 (status 30 June 2024)

Source: Cohesion Open Data Portal

Member State mid-term evaluations and stakeholder consultations indicate that the current geopolitical situation has had an impact on migration flows and border management, marking a shift in Member States towards investments aimed at strengthening EU's external borders and reducing the investment on other activities still under the scope of SO1.

The analysis of financial data suggests that activities under SO1 such as measures of protection of vulnerable groups within the framework of border control ([60]), infrastructure

([59]) It should be noted that the Special Transit Scheme pertains exclusively to Lithuania and should therefore be regarded as a country-specific area of intervention. Furthermore, when examining absorption rates, the quality of the data does not allow for an accurate depiction of distribution across all countries. Consequently, this data will be approached with particular caution.

([60]) 004, 001, 003 (Actions listed in annex IV, (5), (6), (8)).

upgrades or data management and exchange have been much less implemented at this stage than activities that have more of a direct focus on border control. This observation can be explained by migration pressures at borders as suggested by stakeholders' interviews from Member States. In Eastern Europe, this led Member States to reinforce the management of the influx of migrants from Russia and Belarus, because of the war in Ukraine and the instrumentalization of migrants. Same pressure occurred also in southern Europe with high migration influx arriving for instance in Spain in February 2024 on El Hierro, Canary Islands. In the long run, this might negatively impact the achievement of operational objectives concerning data management and exchange, migrant assistance activities, as well as the enhancement of the inter-agency cooperation at all requested levels, the increasing capacity to render assistance to persons in distress at sea and the support of search and rescue operations in the context of border surveillance operations at sea.

The specific support to Lithuania through the Special Transit Scheme has provided financial assistance in smooth transit between the Russian Federation and its Kaliningrad region through Lithuania at a difficult political moment following the Russian war of aggression towards Ukraine, in compliance with EU regulations on transit and border management ([61]). The support funded assistance to managing transit-related visa procedures, compensating for the lost revenue from visa fees and covering additional costs ([62]) incurred from implementing the *Facilitated Transit Document* and *Facilitated Rail Transit Document* schemes ([63]).

Overall, concerning SO1 the Member States' mid-term evaluation reports show a focus on better border checks and surveillance, analysis of risks and threats, as well as enhancing and maintaining IT infrastructure such as upgraded software and equipment, or cybersecurity for border management, all converging to meeting the objective of integrated and strengthen border management and control. According to interviews, the operational set up for the development of the Entry-Exit System with financial support from ISF-BV and BMVI has involved a huge effort for Member States. It involved setting it up at all border crossing points digital records of the entries and exits of short-stay visa holders and visa-exempt travellers crossing the EU's external borders.

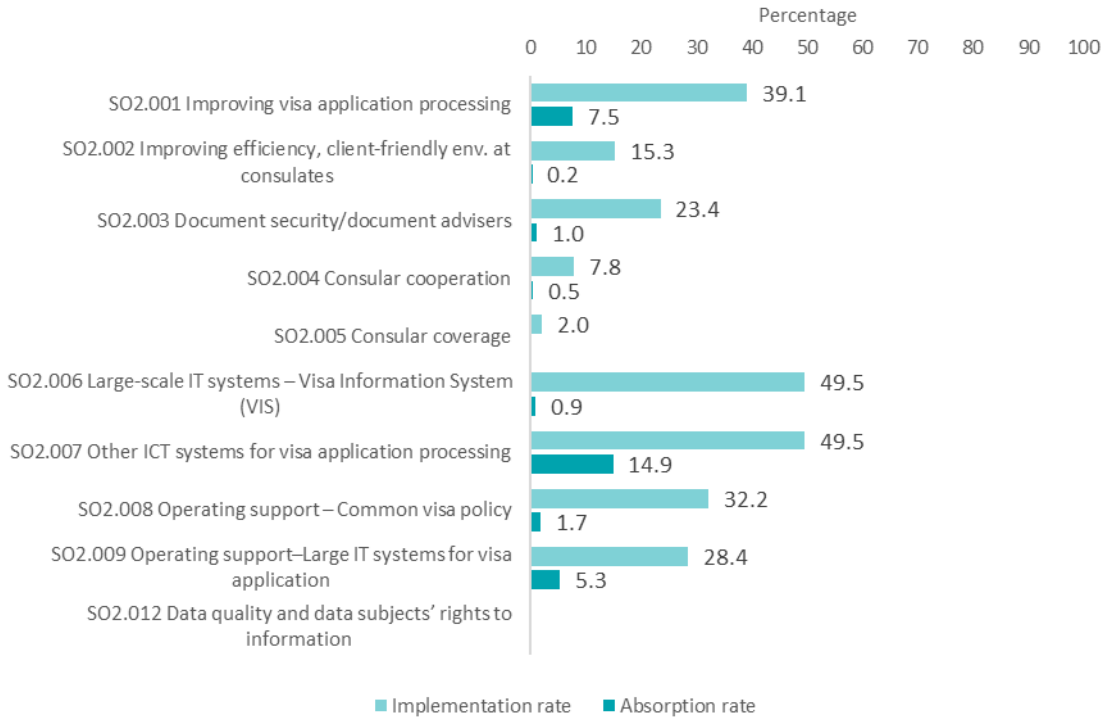
Regarding SO2, the progress towards the achievement of the objectives is slower (see figure 6). However, the higher implementation rates for measures aiming at the implementation of the Visa Information System (VIS), improving the visa application processing, and the relevant ICT systems for application processing, show a positive trend towards the reinforcement of the common visa policy. There has been no progress on extending consular coverage to accelerate procedures.

([61]) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32014R0515

([62]) Additional costs include costs which result directly from the specific requirements of implementing the operation of the Special Transit Scheme and which are not generated as a result of the issuing of visas for the purpose of transit or other purposes. For example, investment in infrastructures, training of staff, salaries (European Parliament, Regulation (EU) No 515/2014 of the European Parliament and of the Council of 16 April 2014 establishing, as part of the Internal Security Fund, the Instrument for financial support for external borders and visa and repealing Decision No 574/2007/EC, Article 11)

([63]) The Facilitated Transit Document (FTD) and the Facilitated Rail Transit Document are specific authorisations allowing for a facilitated transit in the event of specific and direct transit needs by land of non-EU country nationals who must necessarily cross the territory of one or several EU countries in order to travel between two parts of their country which are geographically discontinuous. This is the case for Kaliningrad and the rest of Russia. Source: https://eur-lex.europa.eu/EN/legal-content/summary/facilitated-transit-document-ftd-and-facilitated-rail-transit-document-frtd.html.

Figure 6: Implementation and absorption rates for SO2 (status 30 June 2024)

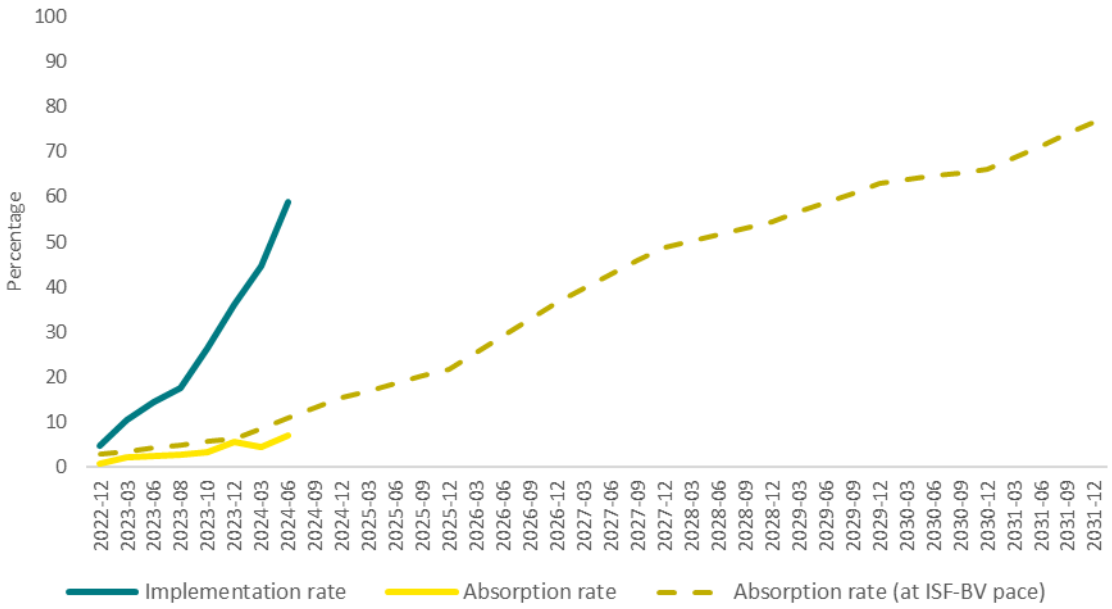


Source: Cohesion Open Data Portal

Following a relatively slow start, implementation rates have picked up and BMVI has shown good overall financial progress across all management modes, particularly due to an increase in commitments (shared management) during the second quarter of 2024, especially under Specific Objective 1 (SO 1). However, financial progress under Specific Objective 2 (SO 2), as measured by the implementation rate, has started more slowly. **The implementation rate at which BMVI is progressing, while on track, is still facing challenges which may hinder the BMVI's capacity to meet its objectives.**

As seen in figure 7, the absorption rate of the shared-management national programmes lags slightly behind that of the predecessor programme ISF-BV, although the good recent progress in the overall implementation rate suggests that absorption will gain speed and is likely to catch up with, and surpass, ISF-BV. The national programmes under ISF-BV have ended with a total absorption rate of 76.6% (N.B.: percentages are calculated on the basis of the current total allocations to national programmes. Possible future additional allocations reduce implementation and absorption rates proportionally).

Figure 7: Implementation and absorption rates for BMVI national programmes (status 30 June 2024), comparative evolution of the absorption rate of predecessor programme ISF-BV



Source: Cohesion Open Data Portal, SFC2014 data (ISF-BV)

As an indicative point of comparison and looking only at shared management, as of mid-2024, BMVI has already committed amounts to concrete operations that more or less match that of the total funding under ISF-BV for national programmes for the whole period of implementation (EUR 2 079 million of commitments reported for BMVI vs. EUR 2 420 million for the ISF-BV under shared management).

In terms of physical performance (common output and result indicators), due to the late start of the programmes, achievements had only started to be reported (only one output indicator reported with a non-zero value for 2023, and only 45 by the end of 2023) when the evaluation was launched. Moreover, there is a lag between implementation and regulatory reporting, which is also affected by the data transmission chain in the different Member States. Finally, some initial targets are obsolete by now due to changes in implementation plans. Because of these reasons, **it is not yet possible to draw conclusions on effectiveness, apart from the obvious fact that achievements in terms of meeting the 2024 milestones for common output and results indicators are uneven across both Member States and the areas of BMVI operations.**

Although the programmes' financial progress under the shared management mode, in terms of funds committed (implementation rate), is satisfactory, the level of physical progress reported in terms of achievements under the common output indicators defined in the BMVI Regulation is therefore generally lagging ([64]).

Information on physical progress, including the metrics of the programme's effectiveness towards reaching its expected objectives paints a heterogeneous picture. While part of this is attributable to differences across the progress in programme

([64]) For the whole list of output and result indicators, see list in Annex

implementation across Member States, as we will see in more detail, an essential explanatory factor behind differences in physical progress indicators is that BMVI's monitoring system has important weaknesses that need to be addressed in the remainder of the implementation period. These include:

(i) monitoring system design issues: as evidenced during the analysis carried out by the evaluators, some common output and result indicators set out in the Regulation are not adequately capturing the direct consequences of programme operations. They are heavily influenced by context and may be better used in the ex-post evaluation of the impacts of the programme. Also, several output indicators refer to physical units of equipment or buildings, which are incomparable across Member States and even across operations, as the nature, area of utilisation and unit value of equipment and buildings can be very different.

(ii) operational issues with monitoring: as evidenced in the case studies and interviews, Managing Authorities encounter difficulties in operationalising the new monitoring indicators and reporting system. Errors and missing/non-reported values in indicators transmitted to the EC through the SFC system occur relatively frequently. Some Managing Authorities do not follow the guidance on the interpretation of certain common indicators and use slightly or significantly different methods when reporting (e.g. on the trainings provided), harming comparability across countries. In addition, as identified by the Commission and verified by the evaluators, on several occasions the initial targets set at the beginning of the programme period became outdated as a consequence of revised plans for implementation - or target setting methodologies were not appropriate from the outset.

Concerning the second point it is expected that as Managing Authorities progress in their learning curve in the second half of BMVI implementation, also the quality of monitoring data might show some improvements. The Commission was counting on this issue from the beginning of the programming period, given the fact that an adjustment to the new system should necessarily be needed.

As highlighted by the European Court of Auditors, the current monitoring system presents significant improvements with respect to the one under ISF-BV, thanks to the adoption of a more standardised system under the CPR, and a clearer guidance on the monitoring system provided by the Commission. An additional limitation of the actual monitoring system is due to the lack of points of comparison with respect to the implementation of the ISF-BV due to the change in the monitoring set-up.

Nine Member States (Belgium, Bulgaria, Hungary, Luxembourg, Malta, Poland, Romania, Slovakia and Portugal) had not yet reported any physical progress of their operations as of 30 June 2024 – although five of them did indicate that they had committed funds to ongoing operations with planned output values for at least some of the relevant indicators (Belgium, Bulgaria, Malta, Poland and Romania).

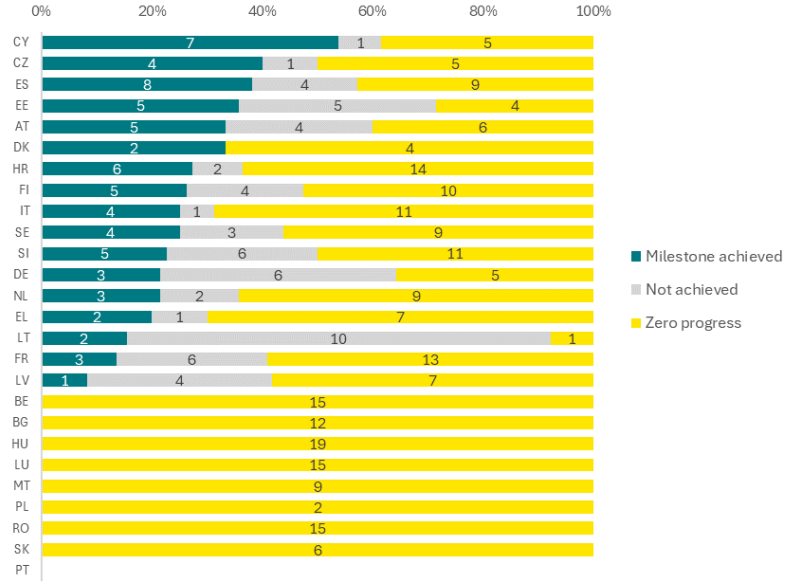
Table 4: Number of output indicators June 2024

Member State	Number of indicators with milestones defined	Number of indicators with achievements reported	As % of indicators with milestones
Lithuania	13	12	92.3
Estonia	14	10	71.4
Germany	14	9	64.3
Cyprus	13	8	61.5
Austria	15	9	60.0
Spain	21	12	57.1
Czechia	10	5	50.0
Slovenia	22	11	50.0
Finland	19	9	47.4
Sweden	16	7	43.8
Latvia	12	5	41.7
France	22	9	40.9
Croatia	22	8	36.4
Netherlands	14	5	35.7
Denmark	6	2	33.3
Italy	16	5	31.3
Greece	10	3	30.0
Belgium	15	-	-
Bulgaria	12	-	-
Hungary	19	-	-
Luxembourg	15	-	-
Malta	9	-	-
Poland	2	-	-
Romania	15	-	-
Slovakia	6	-	-
Portugal	-	-	-

Source: European Commission - SFC2021 data

In terms of the number of output indicators (with a positive milestone value set for 2024) where Member States have reported progress, a large discrepancy between countries can be seen: Cyprus reported to have already achieved more than half of its milestones, while a number of countries such as Czechia, Spain, Estonia, Austria, Germany, Slovenia and especially Lithuania have reported some progress for half or more of their output indicators.

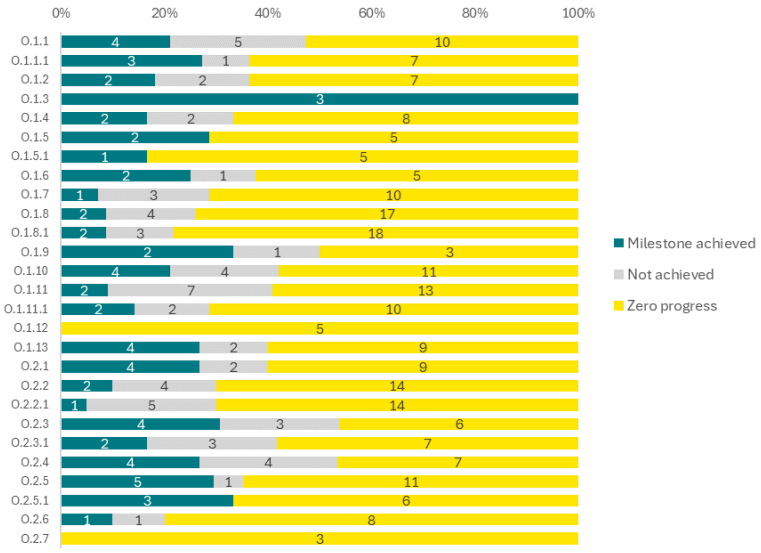
Figure 8: Number of output indicators with milestone value achieved / some progress / zero progress reported, by Member State (30 June 2024)



Source: European Commission - SFC2021 data

No progress at all had been reported by the Member States for two output indicators - O.1.12 'Number of cooperation projects with third countries' and O.2.7 'Number of real estates rented / depreciated' – while reported progress has also been relatively slow and very uneven across countries under indicators O.1.5., O.2.2/2.2.1 or O.2.6.

Figure 9: Number of output indicators with milestone value achieved / some progress / zero progress reported, by indicator (30 June 2024)



Source: European Commission - SFC2021 data

The uneven reporting of physical results can initially be attributed to delays. In most significant cases, triangulated data from performance reports and mid-term evaluation reports indicates that, in Germany and Portugal, the lag is at least partially due to delays in the overall design and approval process. Germany's Programme was approved in November 2022 only. Although Portugal's Programme was validated in 2022, it had not been implemented by the end of 2023. Among the non-EU members, Iceland also faced delays: its participation had not been formalised within the Icelandic and EU legal frameworks by the end of 2023. Other examples of delays were reported, ranging from the late approval of the national programme, ([65]) the large-scale IT-related projects where the delays at EU level (e.g. interoperability and EU-LISA) ([66]), to the administrative burden in the preparation of the system ([67]).

In addition to delays, evidence suggests that a fragile methodology and inconsistent application of the monitoring framework necessitate a cautious analysis of the data regarding the achievement of targets and objectives. Data limitation can be illustrated by the inappropriate definition of initial targets and the fragile adequacy of certain output indicators in accurately reflecting BMVI progress, which is developed below under the assessment of the monitoring framework and its implementation sections.

The BMVI Thematic Facility (EMAS, Specific Actions and Union Actions) has been effectively used to support countries in deploying interventions to face the crises that appeared even before the approval of the programmes, notably the consequences of Russia's war of aggression against Ukraine and the instrumentalisation of migrants by Belarus.

In all countries where the BMVI EMAS support was provided to address the impact of the Russian war in Ukraine (Hungary, Poland, Romania and Slovakia), the intervention was successful in providing urgent financial support for border management activities during a massive influx of people. This has been confirmed through the case studies and the stakeholders' surveys. In all four countries, EMAS contributed to improving border management operations, which included construction of new border crossing points, the deployment of additional border guard officers to existing units and the procurement of equipment designed to aid border control, such as computers, scanners, routers, mobile phones, document readers, biometric data readers, printers, and Wi-Fi routers. For instance, in Poland and in Slovakia, the indicators show that the activities co-funded by BMVI have over-performed in managing to identify a higher number of crossings at the EU external borders than expected and in providing assistance to a high number of persons entering the EU.

Apart from the inevitably reduced information on performance at this stage, the implementation of the monitoring and evaluation framework is affected by several shortcomings.

The effectiveness of this framework is closely tied to the methodologies used by Member States for defining indicators and setting targets, as these methodologies influence the alignment of indicators with programme objectives and the appropriate monitoring of relevant aspects of the BMVI programmes. The review of the target-setting methodologies

([65]) Delays were reported in the mid-term evaluation reports of the national programmes of Belgium, Estonia, Germany, Hungary, Italy, Luxembourg, Slovenia,

([66]) Delays were reported in the mid-term evaluation reports of the national programmes of Belgium, Lithuania, Sweden.

([67]) Romania.

and the mid-term evaluation reports made clear that challenges in methodologies, implementation, data use, and risk management hinder the ability of the monitoring and evaluation framework to provide a full picture of progress.

The analysis also points out a remaining lack of familiarity with a system of continuous monitoring and reporting on outputs and results, as the one defined in the CPR. While Annex VIII indicators in the BMVI Regulation are meant to provide a measure of progress and success at EU level, through the contribution of the Managing Authorities, their aim is not to monitor all operations in each programme. As explained to the Member States at the beginning of the programming period , "if the Member State's strategy stresses a particular output or result that is not included in Annex VIII, or it is relevant for a Member State to monitor or report specific aspects of implementation not covered in the EU performance framework, they can develop their own programme indicators" ([68]).However, several Member States have complained during the evaluation that the indicators set out in Annex VIII BMVI do not cover all aspects of the programme. An effective monitoring system for programmes needs to be based on the specificities of the programmes and a clear gap is apparent here.

In addition, it is important to note that the data transmitted by Member States on indicators contain various errors, including clerical mistakes (instances where data is incorrectly assigned to a different indicator), omissions (such as missing breakdowns of indicators), and inconsistencies between financial reporting and physical progress reporting. The source of these discrepancies may stem from operations failing to plan for indicators or from competent authorities not aggregating and reporting them. Additionally, output indicators may be reported despite no allocations or commitments being made for the connected types of intervention, as indicated by the SFC2021 data transmission.

Moreover, progress observed across Member States– and the appropriateness of some output indicators to accurately reflect progress for BMVI as a whole - also depends on the specificities of physical output measured. For instance, the output indicators for the entire programme can be driven by only a few Member States if they chose to purchase a large amount of equipment or maintain or repair a large amount of infrastructure at relatively low average prices (this is relevant for indicators O.1.1 'Number of items of equipment purchased for border crossing points', O.1.2 'Number of infrastructure maintained / repaired', O.1.5 'Number of aerial vehicles purchased', or O.2.4 'Number of IT functionalities developed / maintained / upgraded'). Similarly regarding the result indicators: Italy, Germany, the Netherlands, for instance, plan to upgrade functionalities in all of their consulates at a low cost per-unit, while other countries focus only on a few new or upgraded consulates and spending more per consulate upgrade, but their numbers will not influence the programme's overall indicator in any perceivable way (see result indicator R.2.8 'Number of new/ upgraded consulates outside the Schengen area').

Finally, reported achievements have often little to do with the initial targets. In several instances, Member States quickly surpassed their initial targets, while in other cases the 2029 targets (and certainly the 2024 milestones) might be out of reach. On the one hand, these issues can be attributed to the target-setting done prior to the operational decisions made on the best way forward (e.g. how to define the scope of projects). They can also be related to changes in the context or in the challenges faced in implementation. While certain changes to plans are inevitable, especially in the field of border surveillance and monitoring, the analysis suggests that the initial target-setting exercise was not

([68]) Note HOME-Funds/2021/28 to the Home Affairs Funds Committee.

systematically grounded in solid evidence and detailed plans outlining how allocations to various intervention areas and types would be utilised. Targets should not be set to make public satisfactory achievements, but to allow for a solid monitoring of the evolution of performance towards the programme objectives. This is often linked to a lack of understanding of the indicators and of their purpose.

This is at odds with the fact that the performance framework defined in the Regulations seems to mean an improvement with regard to the system used during the 2014-2020 period. This point has been underscored by the European Court of Auditors in its Special Report on the Integration of Third Country Nationals, which refers to AMIF but may apply to the reporting framework for the three Home Affairs Funds: "This new reporting framework underscores the shortcomings in the reliability of 2014-2020 project reporting". Additionally, the ECA highlighted as a progress that "these indicators were more easily linked to fund activities than the indicators for 2014-2020" ([69]).

The ECA confirmed this assessment in chapter 3 of their annual report for 2023 ([70]) under the section dedicated to the Home Affairs Funds, with the title "The performance reporting framework improved." The ECA concluded that "We also observed an improvement in the approach to indicators. Legislation introduced a requirement for member states to have a methodology for the establishment of the performance framework and to make it available to the Commission if requested. The 2014-2020 fund-specific regulations established indicators mapped to objectives, without distinguishing between output and results, while the 2021-2027 fund-specific regulations established output and result indicators for objectives, as well as core performance indicators (a selection from the output and result indicators). In addition, the Commission established a metadata set to provide the main characteristics (e.g. definition, unit of measure, frequency, data source, whether the indicator covers output or results) of indicators from the current programming period."

Operationally speaking, BMVI annual performance reports miss sharing key messages on implementation.

The annual performance reports (APR) submitted by the Member States cover a large list of topics (six topics across 16 sections). The purpose of the APR is to understand the overall state of implementation of a programme by requesting information on progress made, challenges encountered, mitigation strategies, processes to ensure complementarity with other funds, etc. It is primarily seeking qualitative information and is complementary to other reporting, such as the transmission of financial data. Member States often report on the progress of each topic by presenting target and output indicators, budget committed (number of activities launched, targeted people impacted, equipment purchased, etc.). While it contributes to a more comprehensive understanding of the data, the text frequently lacks decisive insights that can independently convey a clear picture of the key progress, achievements, and challenges characterising the implementing year. As a result, clear messages about performance-related issues and insights about the practical progress of the programmes towards the targets are often missing. This reduces the added value of such reporting for decision-making in the future.

([69]) Special report 26/2024: Integration of third-country nationals in the EU – Relevant support from the Asylum, Migration and Integration Fund but its impact could not yet be demonstrated.

([70]) 2023 Annual Reports on the implementation of the EU budget for the 2022 financial year and on the activities funded by the 9th, 10th and 11th European Development Funds (EDFs) for the 2023 financial year

On a smaller scale, the implementation of the IT system for the monitoring of EU funds at national level still needs to be fully implemented in a few Member States, according to mid-term evaluation reports.

This may constitute a minor issue, as it depends on adaptations and complete implementation and might be addressed in the near future, according to the mid-term evaluation reports.

While the involvement of partners seems to be understood as a keystone of the CPR, the partnership principle does not seem to be implemented in a similar manner in all Member States.

The Evaluation cannot reach a conclusion as to the actual implementation of a partnership principle. According to Article 8(1) of the CPR, partnership in the implementation of the programmes shall include at least the following partners:

- regional, local, urban and other public authorities;
- economic and social partners;
- relevant bodies representing civil society, such as environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination;
- research organisations and universities, where appropriate.

Article 8(5) of the CPR provides that partners should be involved throughout the preparation, implementation and evaluation of programmes, including through participation in monitoring committees.

According to the preparatory study, Member States have undertaken actions involving the stakeholders in the definition, the implementation, the monitoring and validation of BMVI programme at national level. Evidence collected in the 26 national programmes suggests that 17 countries have social partners in the monitoring committee, 16 have civil society organisations, and seven have representatives of international organisations. Generally, experts and academics as well as economic partners are not well represented in monitoring committees. Engagement of stakeholders is observed but varies unevenly across countries.

Good practices have been found, such as in Hungary, where the Managing Authority, in consultation with the Monitoring Committee, held seven preparatory forums for calls for proposals in 2023. These forums provided detailed presentations to potential beneficiaries about the BMVI programme, including technical content, procedures, and financial frameworks. Various stakeholders participated, including law enforcement, other state administration authorities and educational institutions. Feedback from these events was incorporated into the draft calls for proposals, which were adapted to meet the needs and preferences of potential applicants.

However, even if 54% of the beneficiaries participating in the survey considered themselves “adequately involved in the programming, implementation, monitoring, and evaluation stages of the BMVI”, beneficiaries are stakeholders, but not necessarily partners as per CPR. There does not seem to be a common understanding of the concept of partner

in the programmes, and it is even less clear whether this diverse understanding is in line with the definition in the legislation. This may even appear from the profile of "other stakeholders" who participated in the stakeholders' survey. Of the total number of respondents (72), 55 were public authorities. Only 4 research institutions, 2 business associations and 1 NGO participated in the survey.

The respect of the horizontal principles is enshrined in the preparation and implementation of the BMVI programmes. However, more could be done to monitor the operational application of these principles ([71]).

According to Article 9 of the CPR, in the preparation, implementation and monitoring of the fund, Member States and the Commission shall ensure respect for

- fundamental rights and compliance with the Charter of Fundamental Rights of the European Union,
- equality between men and women, gender mainstreaming and the integration of a gender perspective,

And take appropriate steps

- to prevent any discrimination based on gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation,
- and the accessibility for persons with disabilities

Additionally, the objectives of the instrument shall be pursued in line with the objective of promoting sustainable development as set out in Article 11 TFEU, taking into account the UN Sustainable Development Goals, the Paris Agreement and the "do no significant harm" principle. These are the horizontal principles.

Countries participating in BMVI have reported in their annual performance reports that the respect of horizontal principles in the implementation of BMVI programme has been ensured through detailed legislation and coordinated with relevant authorities, incorporating specific activities such as environmental requirements and training on equality. Evidence from interviews, mid-term evaluation reports and the survey for national authorities show that the respect and promotion of horizontal principles has been effectively ensured at the stage of the project selection through the display of eligibility criteria in the call for proposal and actions. However, they did not clearly indicate that they were monitored in all cases in the process of implementation. The evaluation identified examples in Italy, Austria and Spain as cases where the Managing Authorities engaged efforts to promote and serve horizontal principles during the implementation. For instance, in Italy, the annual performance report indicates that the Managing Authority has included civil society organisations and authorities competent in human rights into the overarching steering committees of the activity portfolio at the stage of activity and programme design.

All participating countries have fulfilled their obligations in terms of communication and visibility of the EU funded operations with the BMVI programme support.

([71]) This section does not refer to the respect of the Horizontal Enabling Conditions defined in Article 15 and Annex III of the CPR. The verification and monitoring of the HECs is carried out by the Commission through a horizontal mechanism covering all CPR funds.

However, it is too early to measure the effectiveness of these measures in reaching their targets.

All Member States having provided their BMVI annual performance report (25) have confirmed that they comply with their obligations in terms of communication and visibility, as defined in the CPR ([72]). Apart from setting up a specific website for the programme, Managing Authorities have carried out specific initiatives through other means of communication, mostly social media networks (Bulgaria with a Facebook page ([73]), Croatia and the Managing Authority's official website along with a Twitter profile ([74]), Estonia with Spotify and a podcast, ([75]) France on the website presenting EU-funded activities "L'Europe s'engage pour la France", ([76]) Spain with its Instagram account) ([77]). Complementary to online actions, seven countries (Cyprus, Finland, Greece, Lithuania, Malta, the Netherlands, Spain) reported to have hosted meetings, seminars, and events to educate and inform beneficiaries and the public about the various objectives, the funding of BMVI, and the results of the programme in the closing of years or for an anniversary (Greece).

The Member State programmes communication strategies are at different stages of maturity and the use of the communication coordination should be maximised to make the most of commonalities between funds.

The use of different targets and platforms implies that an effort has been made to reach the different target populations. However, it was not possible to assess at this stage to what extent these targets have been reached. An effort in order to monitor this aspect and, therefore, provide a more targeted and effective communication to relevant stakeholders, should be an objective for the remaining programming period.

4.1.2. Efficiency

From its early stages of implementation, the BMVI has embedded cost-effectiveness elements at all levels, through rigorous project selection and procurement mechanisms. However, there is insufficient evidence of effectiveness at this stage to carry out a comprehensive cost-effectiveness analysis of operations in any management mode.

Early evidence shows that key mechanisms such as rigorous project proposal evaluations, strategic fund allocation based on historical evidence, and standardised procurement processes are designed to support the cost-effectiveness of the measures.

The evidence collected from desk research and stakeholder feedback point to a strong emphasis on cost-effectiveness within the Instrument's design, both for measures under the Member States' programmes and Union Actions. Cost-effectiveness is used as a criterion in the evaluation of the project proposals, and applicants are required to justify direct costs and submit market analyses to ensure that the proposed expenses are in line with expected

([72]) Art. 22(3)(j) and Chapter III CPR.
([73]) Source: https://www.facebook.com/BGISF/
([74]) Source: https://eufondovi.mup.hr/; https://twitter.com/homefunds.hr
([75])https://podcasters.spotify.com/pod/show/siseministeerium/episodes/20-Eurotoetus--miks-nii-keeruliselt-e1t9vv4?fbclid=IwAR1-gKAOZ1sxCEar8q6V_RVCc12qwULSvwxQ0MrC6A56Eh9EzJCwu8nI5nI
([76]) https://www.europe-en-france.gouv.fr/fr/fonds-europeens/instrument-de-soutien-financier-la-gestion-des-frontieres-et-la-politique-des-visas
([77]) Source: https://www.instagram.com/fondosueseg/

outcomes and market rates. Cost estimates must be aligned with the technical scope and objectives of the projects, and resource allocations must be proportionate to the complexity of the tasks. This includes a careful review of human resources to confirm that team sizes and roles are suitable for the projects' demands.

Drawing from historical data, such as the mid-term evaluation of ISF-BV, BMVI prioritises interventions with a known record of cost-effectiveness. For instance, Spain's programme focuses on interventions that are grounded in evidence of cost-effectiveness, informed by previous programme evaluations. This strategic approach has led to targeted investments in areas vital to border management, such as biometric systems, surveillance equipment, and IT infrastructure for visa processing, which are recognised for their potential to enhance operations.

Additionally, beneficiaries in Member States use feasibility studies to assess the viability of complex projects, which contributes to selecting cost-effective interventions. Procurement processes across Member States ensure competitive pricing and value for money, as evidenced by centralised public procurement offices in Italy, Croatia and Romania. In this regard, "effective monitoring mechanisms of the public procurement market" is one of the enabling conditions established by the CPR ([78]). All participating countries comply with this condition.

The results of the targeted survey suggest a general positive perception with respect to the cost-effectiveness of the measures under shared management. Specifically, 51.9% of national authorities ([79]) perceive that the progress through the BMVI programme was achieved at a reasonable cost to a very large or large extent. Beneficiaries ([80]) also have a favorable view on cost-effectiveness, 71% confirming that the activities they are involved in under BMVI have been executed to a very large or large extent at a reasonable cost.

As concerns EMAS, while the available evidence suggests that the mechanism provides flexible and effective funding solutions (beneficiaries in Hungary, Poland, Romania, and Slovakia emphasised this), a more detailed analysis would be needed to confirm its cost-effectiveness as compared to other delivery options.

The assessment of the cost-effectiveness of the interventions funded by BMVI should become easier as the programmes implementation unfolds and data on effectiveness become more abundant and reliable. However, there is a challenge in evaluating these practices as there is no system in place to track and measure the cost-effectiveness of the actions taken by those who receive funds from the program. Data on financial implementation is not connected to the performance indicators the Managing Authorities need to report on. As a result, it is difficult to analyse the financial investment against the outputs or results for each specific type of activity to determine which ones are giving the best value for money.

The design of the management and control systems for the implementation of the instrument contributes to the efficiency of the processes involved. The progress in

([78]) Notably annex III.

([79]) Targeted survey for national authorities, Question 25: "To what extent do you consider the progress of the operations financed by the following components of BMVI Instrument were achieved at a reasonable cost?", 52 respondents.

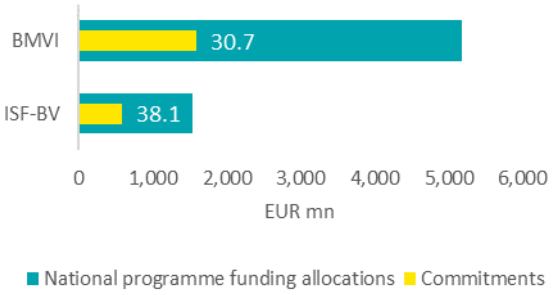
([80]) Targeted survey for beneficiaries, Question 20: "To what extent do you consider the progress of the operation(s) you implement / initiated under BMVI was achieved at a reasonable cost?", 35 respondents.

financial implementation, though at different speeds, seems to confirm that programmes are being implemented efficiently from an operational point of view, since at the mid term stage, the programmes had committed an amount equivalent to the whole allocation in the previous instrument, ISF-BV.

The shift from the implementation of the Home Affairs Funds from the previous Horizontal Regulation ([81]) to the CPR involved several changes in the design, management, monitoring and reporting of the Instrument, both at Commission and Member States level. This may have had a significant impact on the implementation rate of the programmes. Moreover, Member States BMVI programmes were allocated much higher EU amounts as compared to the previous programming period. As the implementation of the Instrument is still in its early stage, it is premature to draw conclusions on the efficiency of the management and control system. However, a first analysis at the financial implementation rate of the programmes activities may shed a first light on this point.

By mid-2024, BMVI Managing Authorities had committed an amount of budget equivalent to the ISF-BV initial budget for Member States National Programmes (EUR 1.591 billion for BMVI and EUR 1.551 billion for the ISF-BV). This seems to suggest that the Member States have been able to respond in an efficient manner to the challenge of mobilising the available funding. And this has happened in a context where the level of human resources involved in the management of the programmes has remained stable, according to the evidence collected through the mid-term evaluations and the consultation of stakeholders.

Figure 10: Situation at mid-term implementation (in million EUR) and implementation rates (in %) for Member States Programmes, ISF-BV and BMVI



Source: Cohesion Open Data Portal, ISF-BV Interim Evaluation

Moreover, BMVI's financial implementation rate is at 30.7%, as compared to ISF-BV's implementation rate of 38.1% at the same period (mid-term). Nonetheless, financial implementation rates are widely diverging. Out of the 17 Member States that reported data in the annual performance report, BMVI implementation rates are higher than for ISF-BV in the case of ten Member States ([82]). For the others, the budget implementation rate is lagging behind.

([81]) Regulation (EU) No 514/2014 of the European Parliament and of the Council of 16 April 2014 laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management

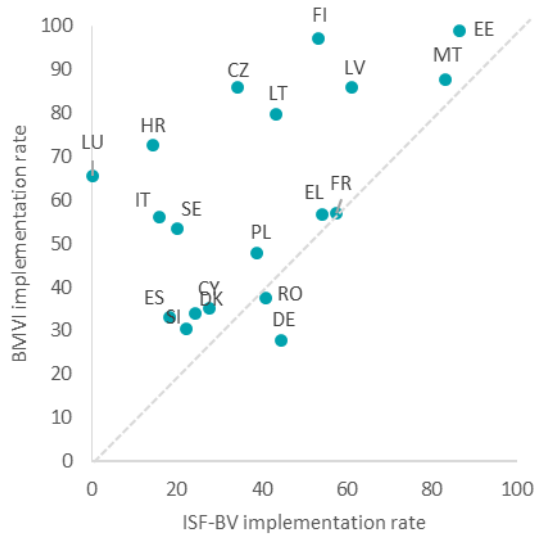
([82]) Austria, Estonia, Finland, Italy, Hungary, Lithuania, Luxemburg, Latvia, Poland, and Sweden.

Table 5: Budget allocations and commitments for Member States Programmes (SO1 & 2), status March 2024 (EUR)

Alternative budgetary baselines	Allocated funds	Commitments reported	Implementation rate
Total allocations (excl. TA) ([83])	5 175 329 534	1 591 013 812	30.7
Only MS reporting progress in SFC2021 (19) ([84])	3 954 290 784	..	40.2
Only for SO where commitments were reported (SO1: 19, SO2: 12[85])	3 822 429 350	..	41.6
Only for SO where commitments were reported, status March 2024	3 476 860 320	..	45.8

Source: European Commission - SFC2021 data

Figure 11 - Comparison of implementation rates between ISF-BV and BMVI at mid-term (30 June 2017/2024), MS reporting data only



Source: European Commission - SFC2021 data

Almost all Member States have had higher implementation rates at the mid-term of BMVI than at the same period for ISF-BV - Romania and Germany being the exceptions (as well as Hungary and Slovakia, which did not report data through SFC2021, and Portugal that did not report either, but its ISF-BV implementation rate in 2017 was also null). Countries that have improved the most the implementation rate under BMVI compared to their mid-term financial implementation rate for ISF-BV include Croatia, Czechia, Finland, Italy, Latvia, Luxembourg and Sweden. Triangulated data from performance reports and mid-term evaluation reports indicate that for Germany and Portugal the lagging behind stems at least partially from the significant delays in the overall design and approval process. Germany's BMVI Programme was approved in November 2022 only. Although Portugal's

([83]) Funding allocated to Member States Programmes by 30 June 2024.

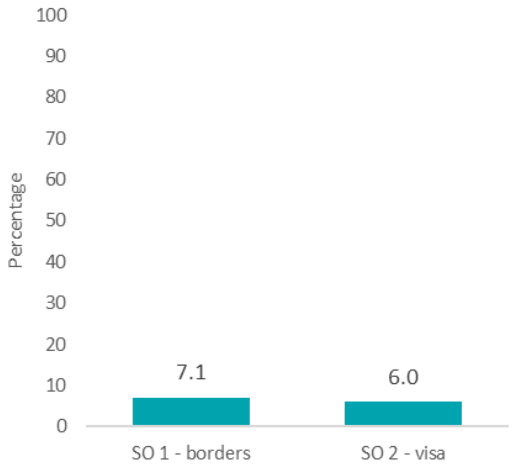
([84]) Countries: Austria, Belgium, Czechia, Germany, Denmark, Estonia, Greece, Finland, France, Hungary, Italy, Lithuania, Luxembourg, Latvia, Malta, the Netherlands, Poland, Sweden, Slovenia.

[85] Austria, Belgium, Czechia, Estonia, Greece, Finland, France, Hungary, Latvia, the Netherlands, Sweden, Slovenia.

BMVI Programme was validated in 2022, it had not been implemented by the end of 2023. From among the non-EU members, Iceland also faced delays: its participation had not been formalised within the Icelandic and EU legal frameworks by the end of 2023.

Implementation rates are perceptibly different between Specific Objectives. The implementation rate on 30 June 2024 stood at 59.8% for SO 1 and at 50.2% for SO2. The analysis of available data on expenditures declared by operations shows differences as well: the absorption rate of the SO 1 is at 7.1%, compared to only 6.0% for SO 2.

Figure 12: Absorption rates for BMVI, by Specific Objective (status 30 June 2024)



Source: Cohesion Open Data Portal

However, as mentioned before, possibilities for an analysis of the efficiency of spending under BMVI are very limited at this stage. Firstly, progress in terms of physical achievements is modest for most indicators; declaration of eligible costs (i.e. reported upon receipt and checks by the competent authority) likewise. Secondly, reported outputs, and especially results, generally cannot be matched with concrete expenditure (eligible costs declared) under the Programme. Most indicators feed from different types of expenditure, and one type of expenditure may also contribute to the achievement of more than one indicator. Nevertheless, a small number of indicators and spending categories could be matched and some considerations on unit costs could be developed in the retrospective evaluation.

The assessment of the system's architecture and design suggests that the system is structured to operate with efficiency. Based on the desk research and stakeholder consultations conducted, management and control systems are designed with clearly assigned roles and responsibilities at both EU and national levels.

At the EU level, the Commission, in collaboration with other authorities, coordinates and monitors the use of EU funds to guarantee the BMVI budget is spent appropriately. The involvement of multiple actors is essential, including the European Anti-Fraud Office (OLAF), which investigates fraud and corruption, and the European Court of Auditors (ECA), which conducts audits to confirm the accuracy of EU expenditures and assess the performance and added value of EU policy. Specialised agencies, such as Frontex, eu-LISA, play a specific role in border management and are involved in the oversight and assessment of measures financed through BMVI.

At the Member State level, each Member State has designated specific authorities or departments as Managing Authorities, Intermediate Bodies, Monitoring Committees, and Audit Authorities. These entities are responsible for the following:

- The Managing Authorities are responsible for managing the Member States' programmes, selecting operations and support for the Monitoring Committee. They are usually a part of the Ministry of Interior or an agency affiliated with it.

- Intermediate Bodies are designated by the Managing Authorities to perform certain tasks related to programme management. Their role is to facilitate the link between the Managing Authorities and the final beneficiaries of the funds.

- The Monitoring Committees are oversight bodies that monitor the progress of programme implementation and approve performance reports. They are composed of representatives of relevant public authorities and partners, including different ministries, police, immigration offices, and specialised agencies.

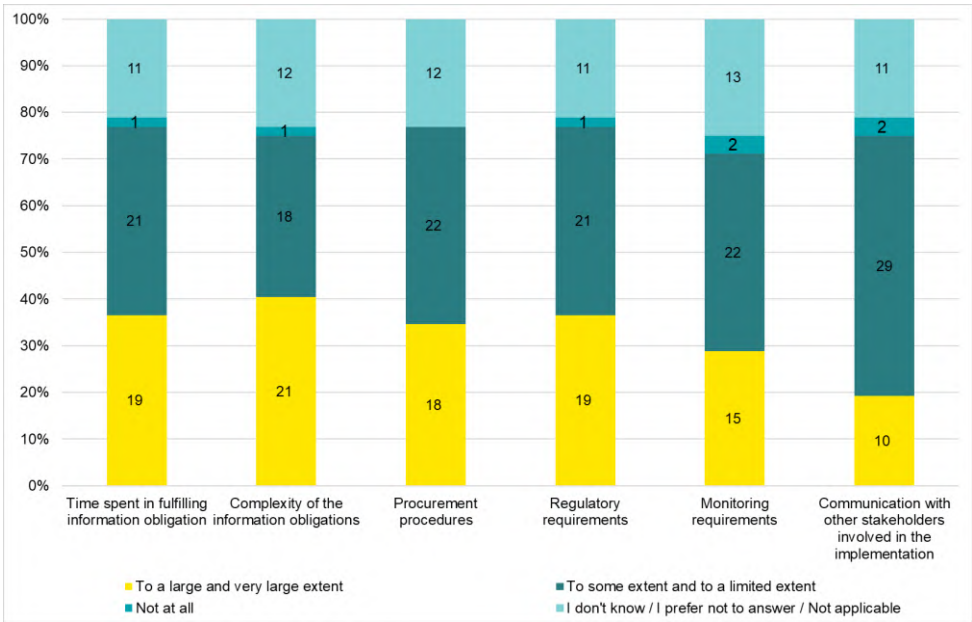
- At the national level, the Audit Authorities are responsible for auditing the programmes and ensuring compliance with financial regulations.

The Member States and stakeholder consultations have highlighted concerns regarding the administrative burden, which may affect both Management Authorities and beneficiaries.

Insights from mid-term evaluations across the Member States and stakeholder consultations have highlighted concerns regarding the administrative burden, which affects both Management Authorities and beneficiaries. This burden is attributed to a range of factors, such as the complex legal requirements and the need for extensive documentation and reporting. The administrative requirements have proven particularly demanding for beneficiaries, which find it difficult to keep up with reporting requirements due to their modest staffing resources.

These findings are supported by the targeted surveys which show that national authorities find regulatory requirements, the complexity of the information obligations, and the time spent in fulfilling reporting obligations particularly burdensome. For a specific representation of these findings, please refer to figure 13.

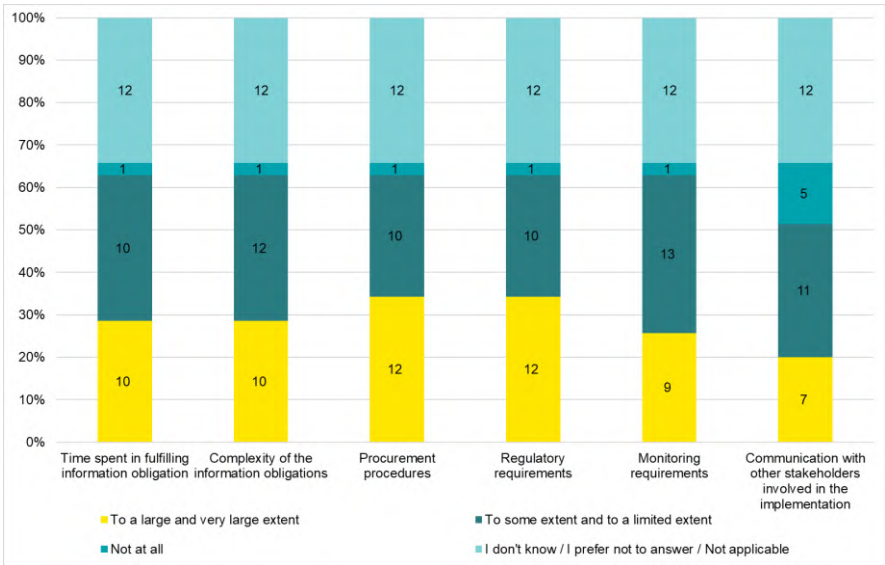
Figure 13: Aspects perceived as burdensome by national authorities (52 respondents, 312 responses)



Source: Targeted survey for national authorities

According to the targeted survey, beneficiaries also face similar issues, though to a lesser degree, with the complexity of the information obligations and procurement procedures being identified to pose challenges on their activity, as shown in figure 13. The administrative requirements have proven particularly demanding for smaller entities, which find it difficult to keep up with reporting requirements due to their modest staffing resources.

Figure 14: Aspects perceived as burdensome by beneficiaries (35 respondents, 210 responses)



Source: Targeted survey for beneficiaries

The Commission is taking the concerns of the Member States seriously and concrete efforts to mitigate these issues are ongoing, with most Member States implementing measures

such as simplified cost options (e.g. flat-rate options and standard cost unit rates) and the new electronic data exchange systems to streamline processes (e.g., AMBIS in Belgium, MMIS in Bulgaria, EUSA2 in Finland and MCIS in Malta). While these simplification measures are in the early stages of implementation and may initially impose an additional administrative burden as individuals learn to adapt to new ways of working, the objective is that they will lead to beneficial outcomes. Stakeholders indicated that, to some extent, **the administrative burden will reduce, once they adapt to new regulatory and reporting requirements, as well as new ways of working**. To facilitate the transition and enhance user proficiency, training programmes are being provided through technical assistance.

In relation to the required administrative procedures, various types of costs have been identified. As detailed in the subsequent sections and further elaborated in Annex IV, these include one-time adjustment costs for compliance with the CPR. Additionally, recurrent administrative costs arise from additional administrative burdens faced by national authorities and beneficiaries due to the complexities of implementing simplified cost options. Despite these challenges, desk research and stakeholder consultations indicate that the costs are outweighed by a range of direct and indirect benefits for authorities, beneficiaries, and target groups. However, since there are no mechanisms in place for systematically reporting costs related to the administrative burden, this hinders the ability to quantify these administrative costs accurately. Given this limitation, an overview of the costs and benefits is detailed in Annex IV, while the sections below provide specific information regarding costs related to workload, the human resources required for implementation, encountered challenges, and the benefits that outweigh these costs.

In relation to the administrative procedures to be followed, a series of types of costs and benefits occurred. With regards to the direct compliance costs, adjustment costs represent one-off expenses associated with the time and resources required for stakeholders to adapt to the changes introduced by the Common Provisions Regulation (CPR), as the objectives, scope, and structure of the Fund and Member States Programmes. Additionally, recurrent administrative costs emerged due to increased information requirements necessary for compliance with monitoring and reporting obligations under the CPR. This included the additional administrative burden for direct beneficiaries stemming from the methodological complexities of implementing simplified cost options and the effort required to adapt to new electronic data exchange systems. Furthermore, enforcement costs were noted, encompassing recurrent expenses associated with monitoring activities. This are linked to the costs related to providing guidance materials and trainings for beneficiaries to use the new electronic data exchange systems. Indirect costs were not found.

On the authorities' side, it is expected that the standardization of CPR across ESI Funds and the development of electronic data exchange systems for monitoring will reduce the administrative burden in the future. On the side of direct beneficiaries, it is expected that in time, the benefits of using the new electronic data exchange systems and standardized reporting will improve the situation.

The actions supported through the Fund will facilitate legitimate border crossing, the detecting of illegal immigration and cross-border crime, as well as the effective management of migratory flows. The Fund will also support the harmonised approach to the issuance of visas, facilitate legitimate travel, while helping to prevent migratory and security risks. However, given the state of implementation of the Fund, such benefits may yet be fully quantified as the implementation of the projects has only recently started.

Indirect benefits are also anticipated, including improved integration and a more uniform, standardized approach resulting from the implementation of the ESI Funds and the Home Affairs Funds under the CPR. This will support the harmonised application of Union acquis and strengthen effective European integrated border management at the Union's external borders. Furthermore, there will be increased and more effective cross-country cooperation in the areas of border management and visa issuance.

Regarding the Thematic Facility, the design of the Specific Actions belongs to the Member State applying to the Commission calls for the expression of interest and needs to comply with the call specifications. It also belongs to the Member State to make sure that its application is complementary with the BMVI programme and other EU funding, so that it can be integrated without overlaps. This requires a strategic approach to the development of Specific Actions which should be designed to complement regular interventions. According to the evidence collected, this understanding is not yet fully developed in all Member States, which may have led to inefficiencies such as potential overlaps in terms of scope or timeline between the measures under the Member States Programmes and Specific Actions within the Thematic Facility.

Specific Actions are greatly appreciated for their advantages in terms of flexibility and provision of ad-hoc additional funding for specific priority interventions.

Overall, Managing Authorities and beneficiaries gave positive feedback and are keen to make further use of them. However, some cases of gold-plating, where participating countries have added administrative burden to the process of application for the Specific Actions, have been identified. According to the case studies, in some Member States, when the Specific Action has been awarded and integrated in the programme, the beneficiaries need to apply again for the funding. In those cases, the flexibility of the Thematic Facility is clearly affected.

Technical assistance is consistently appreciated as a positive contribution to the effective and efficient implementation of management and control systems.

Technical assistance is intended to provide financing for carrying out, inter alia, functions such as preparation, training, management, monitoring, evaluation, visibility and communication. Even if presented as a separate objective, Technical Assistance is provided in the form of lump sum amounts of 6% to the eligible expenditure included in each payment application ([86]).

The targeted surveys conducted ([87]) show a high appreciation of this support, with 52% of the Managing Authorities who replied having received technical assistance from BMVI, with over half reporting a significant positive impact on their management and control systems. Among the beneficiaries ([88]), 20% received assistance, with 86% noting a substantial improvement in their systems, highlighting the value of technical support. For instance, data from the conducted country case studies indicate that technical assistance is used in Croatia, Italy, and Romania for the development of electronic systems and provide user training to streamline management and control processes. In Greece, technical assistance has been used to restructure the Managing Authority to make it more efficient

([86]) Article 36 of CPR.

([87]) Targeted survey for national authorities, Question 27: "Did you receive technical assistance under the Member State Programme funded by BMVI?", 52 respondents

([88]) Targeted survey for beneficiaries, Question 25: "Did you receive technical assistance in the context of the operations implemented / initiated under BMVI?", 35 respondents

and to help speed up the procurement processes. In Italy, technical assistance has improved the guide that outlines how projects should be managed and monitored (Operations Manual of Procedures) and supported a service (Technical-Administrative Secretariat help desk) that quickly addresses the need for simplifying procedures, making it easier to navigate the programme's requirements.

Challenges related to administrative workload and organisational bottlenecks have delayed the start and implementation of activities.

The initial challenges in implementing BMVI were primarily due to the delayed approval of Member State programmes in 2022, linked both to the development of the programme at national level, and the validation and discussion process between the Commission and Member States. In several Member States, the late approval of the BMVI programmes, including the funding plan, application opening, project selection, and implementation of the performance framework, postponed the granting of projects and extended the overall implementation timeline.

Additionally, as mentioned above, human resource issues have had an impact in the efficient implementation of the programmes. In some cases, they were related to lack of staff. In other cases, there was the need for staff to become sufficiently skilled to manage the workload of activities required to manage and monitor such programmes benefitting of a significantly increased allocation. Staff resources seem to have remained overall constant, and this situation appears to have led to difficulties in handling the sourcing, assessment and selection of projects. However, the instrument is designed to support measures that assist human resources through the technical assistance component. As previously mentioned, in Italy, technical assistance has been employed to enhance the management and monitoring and to support a helpdesk that swiftly responds to the need for procedural simplification, thereby facilitating easier navigation of the program's requirements.

In some cases, the lack of skilled staff, coupled with the heavy workload, has hindered their ability to seek out innovative projects, resulting in a lack of diversity in project content. In some countries, national authorities have struggled to source and select projects that are both innovative and relevant. This occasional lack of projects has contributed to the slow pace of BMVI implementation. In France, Hungary, and Italy, Managing Authorities faced this kind of challenges in selecting relevant and innovative beneficiaries.

The challenges related to administrative workload and organisational bottlenecks also influence costs. The review of Annual Implementation Reports confirms that direct labour costs and the time devoted to completing activities have been impacted by the administrative burden and the need for additional training and capacity building, as noted by France and Greece. As already mentioned, the absence of mechanisms for systematically reporting costs associated with the administrative workload at the Member State level limits the possibility to quantify these expenses.

Managing authorities know about the simplification possibilities in the CPR, but are not fully aware of how they work, which leads to a limited buy-in in some cases.

The evaluation has identified two areas for developing simplification strategies in the implementation of the fund:

- Increasing the use of simplified cost options and financing not linked to costs;

- Implementing and improving electronic data exchange systems and other IT systems to reduce delays and administrative burdens.

As mentioned above, the general knowledge about the simplified forms of grant funding is counterbalanced by a general perception of potential burden in applying them, and therefore there is room for development in this sense.

Simplified cost options streamline administrative processes for Member States, allowing to focus on policy objectives rather than administrative requirements. They aid small entities, minimise error risks, enhance fund efficiency, and adapt to economic changes. Simplified cost options also permit the adoption of established EU or national calculation methods and cover operations such as public procurement expenses ([89]). A significant number of Member States (14) stated that, from the adoption, the Member States programmes would make use of adopted simplified cost options / financing not linked to costs ([90]). For example, Czech Republic and Romania have implemented simplified reporting methods including unit cost reporting for wage expenses, reducing the administrative load for beneficiaries and Managing Authorities. This method emphasises key control samples over exhaustive verification, enhancing project efficiency.

Indirect benefits are also anticipated on medium and long term, including improved integration and a more uniform, standardised approach resulting from the implementation of the European Structural and Investment Funds and the Home Affairs Funds under the CPR. This will support the harmonised application of Union acquis and strengthen effective European integrated border management at the Union's external borders. Additionally, enhanced and more effective cross-country cooperation in border management and visa issuance is expected.

Stakeholder consultations suggest an extended use of simplified cost options, even in Member States that have not declared the use of simplified cost options from the adoption of the programme. The targeted survey results ([91]) support the finding, showing that a third of the Managing Authorities declare they implemented simplification measures in the programmes funded by BMVI. According to the CPR, where the total cost of an operation does not exceed EUR 200 000, the contribution provided to the beneficiary from the BMVI shall take the form of unit costs, lump sums or flat rates. However, the influence of this provision in the buy-in of simplified cost options has not been ascertained.

Despite these efforts, the perceived effectiveness of these measures in simplifying programme management procedures was considered modest, with a significant part of respondents reporting only a low (28,1%) to moderate (25%) level of simplification.

Some stakeholders reported the use of simplified cost options is hindered by the methodological complexity of formulating standardised rates that capture the varied costs across different regions, sectors and types of projects. Moreover, determining the appropriate rates for simplified cost options may involve complex calculations that account

([89]) Commission Notice Guidelines On The Use Of Simplified Cost Options Within The European Structural And Investment Funds (Esi) (2021/C 200/01)

([90]) Austria, Belgium, Cyprus Czech Republic, Denmark, Spain, Finland, France, Croatia, Hungary, Luxembourg, Malta, Poland, Slovenia).

([91]) Targeted survey for national authorities, Question 28: "Were simplification measures (e.g., simplified cost options) used into the Programmes funded by ISF -BV and BMVI Instruments?", 52 respondents

for historical data, statistical analysis, and projections of future costs, which presents a substantial challenge for potential users.

Moreover, Commission's exchanges with Managing Authorities seem to show that financing not linked to cost is a modality that is not fully understood by the Member States. This was obvious during the negotiations for the EMAS assistance for Member States at the forefront of the Ukrainian crisis. The idea of financing not associated to the reimbursement of any specific type of costs requires a change in mentality.

It is worth noting that a substantial share (46.3%) of the participants in the surveys were either uncertain about the existence of simplification measures or preferred not to respond, indicating a possible lack of awareness.

The establishment of IT systems at Managing Authority level is a promising way of ensuring more streamlined communication and reporting, shortening the duration of the processes and the administrative workload.

Member States ([92]) have implemented or are in the process of developing new IT systems, as the CPR requires the Managing Authority to set up electronic data exchange systems between programme authorities and beneficiaries ([93]). Some examples include the AMBIS platform in Belgium, the MMIS system in Bulgaria, the FIMAS accounting system in Cyprus, the E-Synergie platform in France, and the ROFED computerised system in Romania. These systems are used for project management, reporting, data storage, communication, and simplification of administrative processes.

As noted above, as the IT systems are still in the early stages of testing and user adoption, their contribution to implementation efficiency cannot be measured yet but are showing preliminary benefits. According to the country case studies conducted as part of the evaluation, the initial experiences with electronic data exchange platforms across various countries have been promising, indicating their potential to streamline processes.

These preliminary gains include improved data sharing and communication among involved parties, reduced reliance on paper-based processes, and the potential for enhanced transparency and accountability in programme management. However, many countries are in the early stages in the adoption of such technologies, and as with any innovation, there is a natural period of adjustment. As these systems continue to be developed and integrated, it is expected that they will further facilitate coordination between the national authorities and beneficiaries.

At these initial stages, there is possibly a higher administrative burden linked to the necessary learning process for getting the systems fully functioning. The increased effort required to implement and adapt to new electronic data exchange systems results in administrative costs. Additionally, as these platforms continue to evolve, ongoing technical assistance and accessible training will be essential in enabling users to become more comfortable and proficient, thereby maximising the benefits of these systems. This will also incur recurring enforcement costs, which encompass expenses related to the provision of guidance materials and training for beneficiaries on the effective use of the new electronic data exchange systems. As noted in Annex IV, in the long term, the benefits of

([92]) Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Malta, Poland, Romania, Slovenia, Spain

([93]) Article 69(8) and Annex XIV CPR.

implementing these new IT systems are expected to outweigh the incurred costs. The introduction of these electronic data exchange systems for monitoring is anticipated to reduce the administrative burden, leading to enhanced oversight of the Fund's implementation and ultimately improving the efficiency and effectiveness of resource allocation.

4.1.3. Coherence

The assessment of coherence refers to the assessment of both internal and external coherence of BMVI. The internal coherence of BMVI relates both to the internal coherence of the Fund components and management modes and how interventions generate synergies through formal or informal cooperation (EQ9). The assessment of external coherence assesses the complementarities and synergies between BMVI and other EU policies and priorities, other Home Affairs Funds and other EU funding instruments (EQ10).

Coherence between the components of the instrument

The assessment of coherence refers to the assessment of both internal and external coherence of BMVI. The internal coherence of BMVI relates both to the internal coherence of the Fund components and management modes and how interventions generate synergies through formal or informal cooperation (EQ9). The assessment of external coherence assesses the complementarities and synergies between BMVI and other EU policies and priorities, other Home Affairs Funds and other EU funding instruments (EQ10).

BMVI's architecture enhances internal coherence by fostering complementarity across components. The combination of the four components of the instrument (Member State programmes, Specific Actions, Emergency Assistance and Union Actions) and the three management modes (shared, direct and indirect) enables flexible fund management.

Table 6: Management mode and components in BMVI according to the legal base

Purpose	Shared management	Direct management	Indirect management
7-years strategy for the contribution of the fund to the specific objectives of BMVI at participating country level (Art. 13) *(NB including possible contributions from the thematic facility – Specific Actions)*	**Member States Programmes**	/	/
Transnational or national projects that bring Union added value in accordance with the objectives of the instrument for which one, several or all Member States may receive an additional allocation to their programmes (Art. 2.8). Identified on an on-going basis and delivered through the Commission's Thematic Facility multi-annual work programmes	**Thematic facility:** Specific Actions*	/	/
Address urgent and specific needs in the event of duly justified emergency situations (Art. 25), delivered through Commission's Thematic Facility multi-annual work programmes	**Thematic facility:** emergency assistance*		
Transnational projects or projects of particular interest to the Union (Art. 2.10) identified on rolling basis and delivered through the Commission's Thematic Facility multi-annual work programmes	/	**Thematic facility:** Union Actions	

*Source: Regulation (EU) no 2021/1148, Note: *Where Specific Actions and emergency assistance is delivered through shared management in the Member States Programmes, it must be duly earmarked.*

This mixed architecture, with the creation of the Thematic Facility, is an innovation of the 2021-2027 Home Affairs Funds. It is meant to ensure a right balance between a long-term capacity-building strategy around the objectives of the Regulation, and the need for punctual flexibility in order to face unforeseen events or new policy developments. This approach is largely well perceived by the stakeholders. The survey of national authorities showed the vast majority consider the fund structure to positively contribute to ensuring complementarities (85-90% considering it to have contributed at least to some extent, or to a large or very large extent). The survey of "other stakeholders" shows similar findings (80-86% considering it to have contributed at least to some extent, or to a large or very large extent).

The complementary nature of the Thematic Facility components has been positively assessed in the Member States mid-term evaluation reports on BMVI implementation. This is further confirmed by the replies to the surveys to which national authorities and other stakeholders participated. Examples from the country case studies show concretely how the different funding modalities can be used to complement each other. For instance, in Poland, a Specific Action was used to support the building of technical protection of the EU's external border in wetlands, coastal areas and rivers along the Polish-Belarusian state

border and the modernisation of the radio communication system. The funding was ultimately insufficient to cover the entirety of the concerned border length, so an additional complementary project was included in the programme to cover the remaining part of the external border across the Świsłocz and Istoczanka rivers. In other cases, the Specific Actions are used to complement Member States Programmes.

However, as mentioned above, the strategic approach to complementarity between Specific Actions and the regular actions in the programmes does not seem to be fully developed in some countries ([94]), leading to a risk of overlap.

The evaluation has also brought forward examples of complementarity between the Union Actions and the other components of the instrument, with projects providing added value by testing approaches for future development in the frame of standard programming or policy making. For instance, this was the case for the so-called "DTC pilots", which supported the added value of digitalisation and remote checking of travel document, as a way of speeding up the procedures. However, the transnational character of Union Actions) are reportedly a challenge for some national authorities who are not used to working systematically outside their national context ([95]).

There are formal and informal mechanisms in place to ensure complementarities and, where relevant, synergies across the different components but these could be strengthened, particularly for Union Actions.

Formal mechanisms are in place to ensure the Thematic Facility (delivered through multi-annual work programmes developed by the European Commission) complements the support delivered through the Member States Programmes (developed by Member States in consultation with the European Commission at the start of the programming period) at the EU and national level.

At EU level there is a designated coordination unit in DG HOME, which ensures there is a clear consultation process where the relevant geographic and policy units feed into the decision-making processes (i.e. drawing up the multi-annual work programmes). Possible complementarities across funding provided through different components and management modes should therefore be ensured.

Additionally, the Thematic Facility Steering Group (TFSG) composed of DG HOME Senior management is responsible for the overall planning and monitoring of the implementation of the Specific Actions and the related budget. The TFSG validates the proposals for selection, based on the selection by the individual Specific Action Steering Committees (SASC) and takes decisions on the final budget allocation resulting from the outcome of the evaluation of the calls, bearing in mind the implementation of all other strands of the Thematic Facility work programme.

The Working Group on Specific Actions (WGSA) is responsible for the overall coordination, planning and support of all SASCs.

([94]) For example: Poland, Bulgaria, Italy, and Romania.

([95]) As exemplified in discussions with national authorities in several countries for the country and thematic case studies conducted in the context of the preparatory study. Discussions revealed the organisational challenges and difficulty prioritising transnational work in view of competing demands. It is worth noting that this challenge is not relevant for some Union Actions, direct awards are also possible and these do not require a transnational component.

Other Commission services are consulted in the preparation of the Thematic Facility work programmes through the interservice-consultation process. Finally, the Home Affairs Committee approves the Thematic Facility Work Programme and has to give a positive opinion to all substantial amendments to it.

At the national level, complementarity is ensured by the requirement to have a monitoring committee, which has oversight of all the support delivered at national level. The extent to which complementarities are ensured also depends on the day-to-day coordination mechanisms at national level which are the responsibility of the Managing Authority. The national midterm evaluation reports indicate that this coordination is almost always assessed positively. However, as usual, this assessment varies from case to case.

In some cases, stakeholders have pointed to a slight mismatch between the approach for Specific Actions and Union Actions, in the sense that Member States are not consulted ex ante about Union Actions in the manner they are for Specific Actions. However, it is important to note that each type of action is implemented in a different management mode. As Specific Actions run in shared management, they need to be integrated into the programme. They need to be checked regarding the complementarity and lack of overlap with the interventions in the programme, which may only happen at the level of the Managing Authority. This is not the case for the Union Actions, which are implemented by the Commission (in direct or indirect management mode) and selected by the Commission in the form of direct awards or calls for proposals. Even so, the work programmes for the Thematic Facility that include a description of the planned Union Actions are submitted to the Home Affairs Funds Committee, where Managing Authorities are represented, for initial approval and any substantial amendment.

When it comes to Union Actions, informal processes are in place to encourage the take up of outputs of Union Actions in Member States programmes. Beneficiaries of Union Actions are encouraged to seek funding from national authorities to follow up innovative actions and activities once their grants end (e.g. to integrate the activities into the Member States Programmes, to provide national funding or to apply the results into policy measures).

The use of events can encourage networking and ensure these synergies are exploited ([96]): not least, the event organised by DG HOME on 25 June 2024 to facilitate networking. This event brought together over 300 beneficiaries of HOME funds in the fields of migration, border management and security, gathering in Brussels together with the EU national authorities managing the Funds ([97]).

The BMVI is coherent with the different components of the border management and visa policy and contributes to support them.

During the implementation of BMVI (2021-2027), the following EU policies and priorities, and related actors, are of particular relevance:

([96]) Interview with beneficiary and observational data from participation at event.

([97]) See https://home-affairs.ec.europa.eu/news/european-commission-helps-eu-funded-projects-migration-security-and-borders-strive-excellence-2024-06-26_en.

- The European Border and Coast Guard Regulation (EBCG) ([98]), which strengthened the Frontex mandate, and set out rules on EUROSUR (which is the integrated framework for information exchange and cooperation between the Member States and Frontex).

- The revised EU's Visa Code (amended in 2019 ([99]), 2021 ([100]) and 2023 ([101])) and the 2021 Schengen Strategy ([102]), which proposes further actions to make the area without internal border controls fully functioning and more resilient. They set out the priorities in the area of visa policy, including the digitalisation of external border management (i.e. the EES, ETIAS and revisions to SIS and VIS), the digitalisation of the visa, as well as the need or a revised Schengen Borders Code.

- The 2023 European Integrated Border Management Strategy ([103]), covers the EIBM dimension and defines policy priorities and strategic guidelines for each of the 15 components of EIBM set out in the 2019 EBCG Regulation (see figure 15). One of the components is dedicated to solidarity mechanisms (Component 12), under which BMVI is specifically highlighted as the tool to achieve the effective implementation of the EIBM Strategy, together with AMIF.

- The new EU Asylum and Migration Pact, which will apply from 2026, and its Common Implementation Plan ([104]) will require a significant change in the approach to border management procedures and will, therefore, have an impact on funding through BMVI.

According to the BMVI Regulation ([105]), the Instrument should complement and reinforce the activities implementing European integrated border management in line with the principle of shared responsibility and solidarity between the Member States and the European Border and Coast Guard Agency, which represent the two pillars of the European Border and Coast Guard.

([98])Regulation (EU) 2019/1896 of the European Parliament and of the Council of 13 November 2019 on the European Border and Coast Guard and repealing Regulations (EU) No 1052/2013 and (EU) 2016/1624

([99]) Regulation (EC) No 810/2009 establishing the EU's Visa Code; Regulation (EU) 2019/1155 of the European Parliament and of the Council of 20 June 2019 amending Regulation (EC) No 810/2009 establishing a Community Code on Visas (Visa Code) (OJ L 188, 12.7.2019, p.25)

([100]) Regulation (EU) 2021/1134 of the European Parliament and of the Council of 7 July 2021 amending Regulations (EC) No 767/2008, (EC) No 810/2009, (EU) 2016/399, (EU) 2017/2226, (EU) 2018/1240, (EU) 2018/1860, (EU) 2018/1861, (EU) 2019/817 and (EU) 2019/1896 of the European Parliament and of the Council and repealing Council Decisions 2004/512/EC and 2008/633/JHA, for the purpose of reforming the Visa Information System

([101]) Regulation (EU) 2023/2667 of the European Parliament and of the Council of 22 November 2023 amending Regulations (EC) No 767/2008, (EC) No 810/2009 and (EU) 2017/2226 of the European Parliament and of the Council, Council Regulations (EC) No 693/2003 and (EC) No 694/2003 and Convention implementing the Schengen Agreement, as regards the digitalisation of the visa procedure

(102) Communication from the Commission to the European Parliament and the Council "A strategy towards a fully functioning and resilient Schengen area"

([103]) Communication from the Commission to the European Parliament and the Council establishing the multiannual strategic policy for European integrated border management, COM(2023) 146 final

([104]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Common Implementation Plan for the Pact on Migration and Asylum, COM/2024/251 final

([105]) Recital 20 and Article 3(2(a)) BMVI Regulation

The 2023 evaluation of the EBCG Regulation ([106]) did not specifically assess the coherence of the Regulation with BMVI. However, the BMVI Regulation includes numerous references on coordination with Frontex Funded actions need (i) to be aligned to the components of the EIBM as defined under the ECBG Regulation ([107]), (ii) contribute to the development of operational capabilities of the EBCG ([108]) and (iii) be aligned with the standards set in the EBCG Regulation ([109]).

Coherence between EBCG and BMVI is foreseen through the Member State capability roadmaps, which are adopted in pursuant with Article 9(4) of the EBCG Regulation, and which should inform the planning of actions under the BMVI Member States programmes (see also under section 4.3 on Relevance).

As regards the Thematic Facility, a call for a Specific Action for the purchase of equipment to be made available to Frontex was launched in 2021. This action shows the complementarity of the work between Frontex and the Commission, since the specifications for the call were drafted based on the technical assessment of its own needs made by Frontex, which was also involved in the award process.

Specific coordination mechanisms exist to ensure the coherence of BMVI actions that relate to Frontex. The EBCG Regulation and BMVI Regulation provide that BMVI should contribute to the development of operational capabilities of the EBCG, with the Member States capability plans as one tool to ensure coherence. The EIBM Strategy further indicates that "close cooperation between the Commission and Frontex should ensure synergies between Frontex activities and actions funded by other EU funding instruments and avoid double financing". In practice, Frontex was consulted when adopting the BMVI programmes and, according to the established procedure for programme amendments, is consulted on the BMVI programme amendments "introducing operating support". Frontex can also be invited as an observer in the assessment of applications for Specific Actions, Union Actions or EMAS. In addition, the Frontex Management Board (consisting of all national authorities and DG HOME) also serves as a forum where Member States discuss emerging and future needs and how these needs can be best addressed – either through national actions, by Frontex and/or with the support of Home Affairs funds. The Frontex Management Board has set up a specific task force to that effect. Some stakeholders consulted highlighted the need to further strengthen the link between BMVI and the national capability roadmaps to ensure continued coherence of the BMVI with the EBCG Regulation and EIBM Strategy.

BMVI is coherent with the revised Visa Code and Schengen Strategy, since it supports the interoperability of information systems and the ongoing digitalisation of the visa procedure, therefore helping Member States to cope with the increased numbers of travellers to the EU and reinforce the security of the Schengen area. Examples from the country case studies, such as the research in Norway, confirm that this support can be observed in practice. The recently published evaluation of the Visa Code ([110]) concludes

([106]) European Commission, Study to support the evaluation of the EBCG Regulation and review of the Standing Corps, July 2023.
([107]) See Annex II (1)(a) BMVI Regulation, referring to Article 3(1) of the EBCG Regulation
([108]) Point 1(b) of Annex II, and (1) of Annex IV, BMVI Regulation
([109]) E.g standards for IT and equipment, see Article 13(14)(a)BMVI Regulation or European educational and common training standards for border and coast guards, see Article 13(16) BMVI Regulation
([110]) Commission Staff Working Document, Evaluation, EU visa policy – evaluation of the Visa Code, Brussels, 19.4.2024 SWD(2024) 108 final

that the Visa Code amendments are internally coherent and complementary with the general orientation and specific policy interventions at EU level in the field of border management, while not entailing a specific assessment of the coherence with BMVI. Looking ahead, BMVI is also on track to remain coherent with the new rules on the digitalisation of the Schengen Visa process. ([111])

Coherence with the European Integrated Border Management Strategy

Figure 15: The 15 components of European Integrated Border Management ([112])

Source: Based on Annex I: EIBM Components of COM(2023) 146 final

BMVI is also coherent with the EIBM Strategy, since the objectives of BMVI support correspond to the different components of the EIBM Strategy.

Table 7 maps the relevant operational objectives from BMVI (based on the detailed intervention logic) to each EIBM component. It shows that the BMVI was meant to contribute to all elements of the EIBM, with some objectives directly relevant to a specific component, while for others (e.g. component 11 quality control mechanisms and 13 Fundamental Rights) all BMVI objectives contribute in a more horizontal way.

Table 7 - Mapping of BMVI implementation measures in relation the EIBM

Components EIBM	BMVI Implementation measures ([113])
Border Control	1(a): Improvement of border control
Search and Rescue	1(f): Increasing capacity to render assistance to persons in distress at sea 1(g): Support to search and rescue operations in the context of carrying out border surveillance at sea.

([111])https://www.consilium.europa.eu/en/press/press-releases/2023/11/13/council-gives-green-light-to-the-digitalisation-of-the-visa-procedure/?utm_source=dsms-auto&utm_medium=email&utm_campaign=Council+gives+green+light+to+the+digitalisation+of+the+visa+procedure and European Commission, Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EC) No 767/2008, (EC) No 810/2009 and (EU) 2017/2226 of the European Parliament and of the Council, Council Regulations (EC) No 1683/95, (EC) No 333/2002, (EC) No 693/2003 and (EC) No 694/2003 and Convention implementing the Schengen Agreement, as regards the digitalisation of the visa procedure, COM/2022/658 final.

([112]) Communication from the Commission to the European Parliament and the Council, establishing the multiannual strategic policy for European integrated border, https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=COM:2023:146:FIN

([113]) Annex II BMVI Regulation.

Components EIBM	BMVI Implementation measures ([113])
Risk Analysis	1(a)(iii): Improvement of external border control: analysis of the risks for internal security and threats affecting external border security
Information exchange and cooperation between MS, and between MS and Frontex	1(c): Enhancement of inter-agency cooperation at national level among national authorities, inter-MS cooperation, other Union bodies and third countries
Inter-agency cooperation within MS	1(c): Enhancement of inter-agency cooperation at national level among national authorities, inter-MS cooperation, other Union bodies and third countries
Cooperation between EU stakeholders	1(c): Enhancement of inter-agency cooperation at national - level among national authorities, inter-MS cooperation**,** other Union bodies and third countries
Cooperation with third countries	1(c): Enhancement of inter-agency cooperation at national level among national authorities, inter-MS cooperation, other Union bodies and third countries
Technical and operational measures within Schengen	1(a)(ii) Improvement external border control: *technical and operational measures within Schengen area related to border control*
Return of third country nationals	**N/A** – no relevant objective under BMVI (returns falls under AMIF)
State of the art tech and large-scale IT systems	1(e): IT systems/communication infrastructure, equipment
Quality Control Mechanisms	1(d) – ensuring the uniform implementation of the EU acquis including quality control mechanisms
Solidarity Mechanisms	**N/A** – this component specifically relates to BMVI as a whole
Fundamental Rights	1(d) – ensuring the uniform implementation of the EU acquis
Education and training	**N/A** – cross cutting
Research and Innovation	**N/A** – cross cutting

In addition, the EIBM Strategy ([114]) provides, in line with the EBCG Regulation, the development of the Border and Coast Guard Capability Development Plan (CDP) ([115]), based on the national capability development plans. As confirmed by interviewees, these national capability development plans will then also be used to inform the planned actions under BMVI Member States Programmes.

EU Asylum and Migration Pact

On 26 April 2024, the EU adopted the EU Asylum and Migration Pact, a set of new rules managing migration and establishing a common asylum system at EU level, that deliver results while remaining grounded in core European values ([116]). The legislative package underpinning the Pact specifies that the relevant Regulations will start entering into application from 1 July 2026. During the **two-year transition period** between the entry

([114]) Communication from the Commission to the European Parliament and the Council establishing the multiannual strategic policy for European Integrated Border Management, COM(2023),146, 14 March 2023

([115]) The Border and Coast Guard Capability Development Plan (CDP) is a single comprehensive framework for border and coast guard capability development, foreseen to be established under the EIBM Strategy

([116]) https://home-affairs.ec.europa.eu/policies/migration-and-asylum/pact-migration-and-asylum_en

into force and the start of application of the Pact, the Member States are called to best prepare their systems and structure, in view of a quick and effective (full) implementation of the Pact as from July 2026, for example by strengthening their reception and border management capacity, in line with the higher standards introduced by the Pact. These will be reflected in their "National Implementation Plans due by mid-December 2024." to be finalised by mid-December 2024.

It will be necessary to make the best use of the AMIF and BMVI resources to address the needs of the Pact.

Coherence with other Home Affairs funds (AMIF and ISF)

Interdependence between the policy areas covered by the three Home Affairs Funds (AMIF, BMVI, ISF) creates challenges for the delivery of the overall policy objectives. **However, it also brings opportunities for enhanced synergies and coordination and, ultimately, reduces the risk of overlaps or duplication**.

Coordination is indeed necessary to support free movement and maintaining the benefits of Schengen, which requires common action at Union level, and constant and continuous efforts from all Member States, as shown by the Schengen strategy from 2021 ([117]). The Schengen area needs to be underpinned by an effective external border management, common visa policy, effective and sustainable return policy, relevant police cooperation instruments and IT systems and a robust governance. To sustain the area of freedom, security and justice requires measures in the field of security, police and judicial cooperation that also promote compliance with fundamental rights.

A common migration and asylum system is also key to supporting the area without controls at internal borders. Each element is necessary – but on its own not sufficient – to achieve the overarching objective of a fully functioning Schengen area, including the lifting of internal border controls. From a funding perspective, this **complex interdependence requires clear priority setting at national level and adequate level of Commission steering where relevant, good coordination between all actors involved in the programming and implementation of national and EU funds** to ensure that the funding effectively contributes to achieving the overall policy objectives in an optimal manner contributing to economies of scale.

The legal framework allows for complementarities and synergies between BMVI and the other Home Affairs funds in three ways:

([117]) Communication from the Commission to the European Parliament and the Council "A strategy towards a fully functioning and resilient Schengen area", COM(2021)277, 2 June 2021.

- Funding of multi purpose equipment: Pursuant to Article 13 (14) BMVI Regulation, equipment and ICT systems required for effective and secure border control funded under BMVI may also be used for achieving the objectives of the ISF and AMIF.

- Also, as per Article 26 of the CPR, Member States may also request in an amendment of a programme the transfer of up to 5 % of the initial national allocation of each Fund to another Fund or Funds.

- Finally, article 26 of the BMVI Regulation provides for the possibility of cumulative financing, i.e. an action that has received a contribution under the instrument may also receive a contribution from any other Union programme, including funds under shared management, provided that the contributions do not cover the same costs.

However, the evaluation did not collect evidence on the extent to which Managing Authorities are aware of and use these possibilities in practice. The only transfer of Funds (from ERDF to the BMVI) was requested by Greece. According to the Greek authorities, it made it easier for the Member State to react to specific situations at the external border.

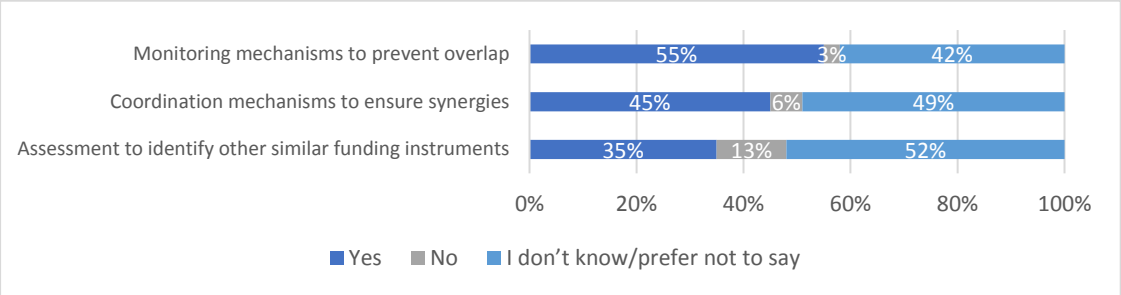
At EU level, coordination is ensured by the fact the Home Affairs Funds being handled in a single Directorate-General, as well as the existing consultation mechanisms applied in the preparation, discussion and adoption of Member State programmes and Commission's work programmes for the Thematic Facility. The Commission also provides assistance to the Member States through the coordination and geographical units in DG HOME, which give answers to questions from Managing Authorities, are in close contact with the Managing Authorities, and follow up closely the proceedings of the monitoring committees.

As regards the Thematic Facility, the Thematic Facility Steering Group and the Thematic Facility Working Group ensure the complementarity and coordination of Specific Actions with policy priorities and existing programmes.

At Member State level, the country case studies confirmed that mechanisms exist to ensure actions implemented through BMVI and AMIF and ISF are complementary with each other, although they differ across Member States. The key mechanisms in place to ensure coherence are the Managing Authorities (in doing their selection of funded actions) and the funds' Monitoring Committees. Beyond this, Member States have also put in place additional means to coordinate across the three funds (see examples below).

As can be seen in Figure 16, the survey with national authorities confirmed that many Member States have at least one type of mechanism in place: most respondents stated to have monitoring mechanisms in place to avoid overlap of funding (55%), followed by coordination mechanisms to ensure their complementarity (45%), while just over a third of respondents reported to carry out assessment to identify similar funding instruments. Seven respondents (amounting to 23% of respondents and covering four different participating countries) responded "I don't know/I prefer not to say" or "no" across all three mechanisms. This lack of awareness could also indicate that such mechanisms are not widely used/consulted within the relevant national authorities.

Figure 16: Mechanisms in place at national level to ensure synergies/avoid overlap between BMVI and with other funding instruments



Source: Preparatory study, targeted survey of national authorities (n= 31)

The case study reports provided more detailed information about the different types of tools in place in the Member States:

- Single planning documents: For example, in Poland a joint Member State Programme was developed to cover the three funds: ISF, BMVI, as well as AMIF ([118]).

- Reviews: such as a review process as that undertaken for the national budget, or examining the actions planned in the Member States Programmes against other relevant national and EU funding (e.g. AT, EL).

- Coordination at the level of authorities, which shows the different levels of organisation across the Member States:

    - Appointing the same authority as the Managing Authority for all three funds (e.g. FI, PL, RO). The Polish case study highlighted in this regard that having the same Managing Authority and the same intermediate body for all three funds facilitates the processes (e.g. preparing calls for proposals) and thereby reduces administrative burden.

    - Establishment of an overarching management or coordination office for the Home Affairs funds (e.g. IT, EL, HR, FR, HU, MT). For example, in Greece, a Special Department of Coordination and Management of BMVI, ISF and AMIF was established to ensure the continued coherence of the funds.

    - Ensuring the same persons sit on the Monitoring Committees of all three Home Affairs funds (e.g. IT, LT). For example, in Italy many of the members of BMVI Monitoring Committee are also members of the ISF Monitoring Committee, which according to the stakeholders interviewed further enhanced communication, awareness of activities and synergies.

    - Organising regular meetings between Managing Authorities (e.g. CZ), or between monitoring committees (BG, EE).

The final layer for assessing complementarity between BMVI funding and other funds are the audits carried out at national and EU level.

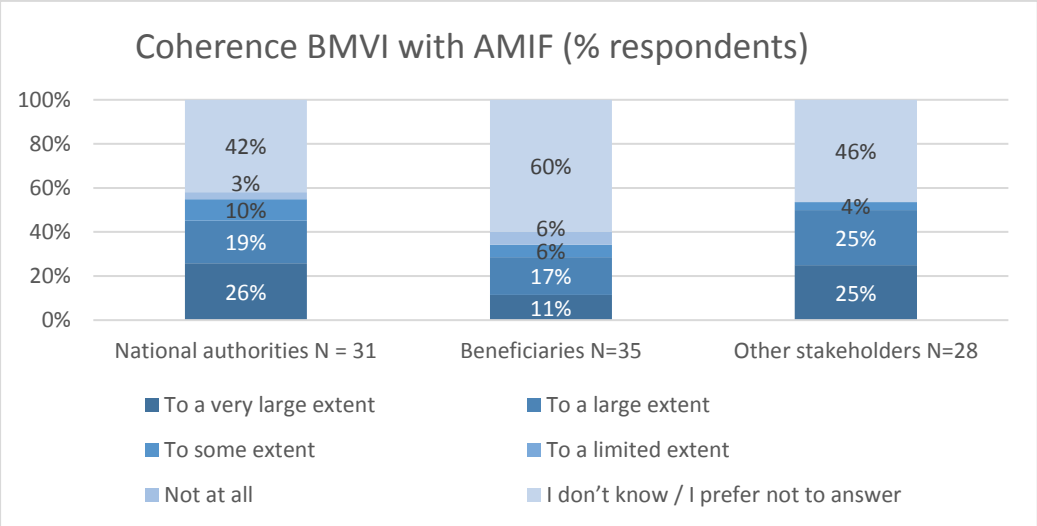
([118]) SFC2021 Programme for AMIF, ISF-BV and BMVI, Poland.

Stakeholders consulted held positive views on the coherence between BMVI and the other HOME Affairs funds (ISF and AMIF), although lack of awareness seems to exist among national level stakeholders as to how synergies could be created.

A large proportion of the stakeholders consulted through the online survey (40-60% depending on the type of stakeholder) did not feel they could answer the question whether the actions implemented through BMVI were coherent with AMIF or ISF. For beneficiaries and "other stakeholders", this could simply indicate a lack of awareness of these other DG HOME funds. This was echoed in some of the case studies (e.g. Croatia), where beneficiaries considered that no overlaps existed but were not aware of how BMVI aligned with other EU instruments. For the managing/implementing national authorities, this could indicate a lack of available mechanisms in place to identify and exploit opportunities to create synergies between the actions funded between the three funds (as also noted above). This thus suggests that more could be done to increase the national authorities' awareness of the potential synergies that could be created, in order to further strengthen the coherence between the three Home Affairs funds.

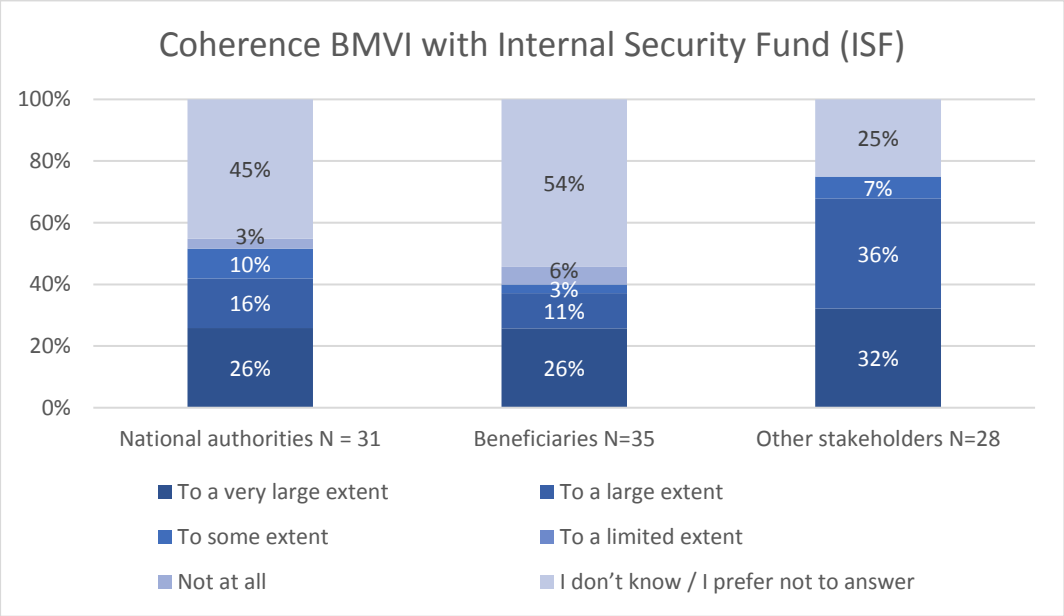
Of those who were able to answer the question, the majority was positive, noting that BMVI actions were coherent to a large or very large extent with AMIF and ISF funded actions. For both AMIF and ISF, only 3% of national authorities, and 6% of beneficiaries thought this was not the case (answering "not at all").

Figure 17: "In your opinion, were the actions implemented through the ISF-BV and BMVI instruments coherent with and non-contradictory (no duplications or overlap) to other EU interventions with similar or complementary objectives? - Asylum, Migration and Integration"



Source: Preparatory study, targeted surveys. Note: While the 31 responses from national authorities only include those relevant to BMVI, the answers of beneficiaries and other stakeholders cover both programming periods (ISF-BV and BMVI funding)

Figure 18: In your opinion, were the actions implemented through the ISF-BV and BMVI instruments coherent with and non-contradictory (no duplications or overlap) to other EU interventions with similar or complementary objectives?



Source: Preparatory study, targeted surveys. Note: While the 31 responses from national authorities only include those relevant to BMVI, the answers of beneficiaries and other stakeholders cover both programming periods (ISF-BV and BMVI funding).

According to the country case studies conducted in the context of the preparatory study, national level stakeholders did not note any overlaps, gaps, or inconsistencies between the activities funded by BMVI and those funded under AMIF or ISF. Several stakeholders highlighted the complementarity between BMVI and ISF, with BMVI having a role in reinforcing internal security by supporting strong border management.

The thematic case study on the Russian war of aggression highlighted that AMIF EMAS and BMVI EMAS funding was meant to be used for different types of activities and therefore complemented each other: while AMIF EMAS funding in Poland and Slovakia was meant to cover activities supporting migrants such as providing accommodation, healthcare services, transportation, BMVI EMAS funding was meant to cover the strengthening of the border management. However, a detailed assessment of how the activities complemented each other was not possible, as EMAS funding (under both funds) was used to support the State budget in more general terms, and it is not possible to identify activities funded through EMAS funding based on financing not linked to costs.

Although coherence between BMVI and the other Home Affairs Funds (ISF and AMIF) has been acknowledged across the Member States, the case studies and Member State mid term evaluations highlighted the following challenges or limiting factors for the creation of synergies:

- Lack of robust coordination mechanisms among Managing Authorities and insufficient information sharing. This is especially the case in Member States where different authorities are in charge of the implementation of the Home Affairs Funds programmes or where the Member State has a decentralised structure, which either do not communicate with each other, or where coordination

arrangements between the Managing authorities are informal or not intensive enough (i.e. ad hoc or irregular meetings).

- The mid-term evaluations of several Member States reported that there was a lack of clarity in the Member States Programmes as to potential links between the funds (i.e. where synergies should be sought).

Coherence with other EU funds

The comparison between their respective objectives and measures shows a high level of complementarity between BMVI and other EU funds, namely:

- In the field of customs: Customs Control Equipment Instrument (CCEI),
- In the field of research and innovation: Horizon Europe
- In the field of EU external action, including EU funds managed by DG INTPA, DG MENA and DG ENEST (NDICI Global Europe and IPAIII).
- Other emergency instruments: including the Recovery and resilience facility (RFF) and the Technical Support Instrument (TSI).
- Other EU funding instruments: the Justice Programme, the European Social Fund Plus and the European Regional Development Fund.

Coherence between the BMVI and other EU funds is conceptually sound and understood in general by stakeholders. However, interviews, surveys and focus groups conclude that coordination mechanisms are sometimes not fully effective, and synergies and complementarities not always visible to Managing Authorities, stakeholders and beneficiaries.

Coordination at EU level is overall ensured by regular or ad-hoc interservice consultation mechanisms between the services responsible. Before the adoption of BMVI Thematic Facility Work Programme and Member States Programmes, the relevant services must be consulted and can comment on the draft text. Conversely, DG HOME can comment on the draft work programmes of the other EU funding instruments. EU level interviews confirmed this process worked well. Issues are often dealt with both formally and informally, including before the interservice consultation.

- Coordination with funds under shared management

In the case of the funds run under the CPR, the main coordination mechanisms, aiming to a standard implementation of the rules and procedures of that regulation, is the CPR Stock-Taking Group, which meets on a weekly basis. The Group includes representatives from DG REGIO, EMPL, HOME and MARE. The Group provides guidance on the interpretation of the funds and answers to CPR-related questions from the Managing Authorities.

The mechanisms in place to ensure coordination of BMVI funding with other EU funds at national level are similar to those described above for the Home Affairs funds, namely through the Monitoring Committee and regular coordination between the Managing Authorities of the different funds.

- Coherence of BMVI with Horizon Europe

BMVI funding is a crucial tool in the development of Research and Innovation in the border management policy area, by ensuring the concepts developed under Horizon lead to longer term testing and validation and eventually ensure these capabilities are available to procure on the EU market. However, possibilities of development are not fully implemented at EU or national level.

The BMVI Regulation supports actions that develop border management related innovation, which in practice is funded under cluster 3 of the Horizon Europe programme (Civil security for society).

The BMVI Regulation provides among others that BMVI shall support "actions developing innovative methods or deploying new technologies with a potential for transferability to other Member States, in particular deploying the results of security research projects where such deployment has been identified by the Frontex, acting under Article 66 of Regulation (EU) 2019/1896, as contributing to the development of operational capabilities of the European Border and Coast Guard ([119]). EU level interviews confirmed that the programming of Horizon Europe research funded under cluster 3 is directly based on the long-term needs in the Frontex and Member State capability plans, and no other funding mechanism exists to establish the link between innovation and later practice.

The Innovation & Security Research unit in DG HOME plays an important role in encouraging this link, being responsible for managing the projects funded under Horizon Europe cluster 3. The unit is involved at the programming stage of BMVI, by providing comments on BMVI Member States Programmes and the Thematic Facility Work Programme. According to the evidence collected, Managing Authorities are often unaware of the relevant Research and Innovation projects funded in their country, as well as the relevant stakeholders involved. In practice, the comments provided by the Commission are very often not taken up by Managing Authorities, as they tend to focus on using BMVI funding to address more immediate needs.

While the BMVI Regulation lists measures deploying, transferring, testing and validating new methodology or technology, including pilot projects and follow-up measures to Union-funded research projects amongst the actions eligible for higher co-financing rates[120] , there appears to be limited awareness among BMVI Managing Authorities and beneficiaries of these more advantageous financial conditions.

In an effort to encourage further uptake of Horizon Europe results, a Specific Action on innovation was launched under the 2021-2022 Work Programme, and as a result five projects are currently ongoing. Proposals are currently being assessed under a second Specific Action on innovation.

While interviewees welcomed these actions as an important step forward, they noted that funding for innovation and further development of long-term capabilities under BMVI was still insufficient. As BMVI funding dedicated to the follow up of Horizon Europe projects had been limited, promising results achieved under Horizon Europe may have been left on the shelf. Interviewees highlighted that if the uptake of these results would not improve

([119]) Point 1(f) of Annex III, BMVI Regulation.
([120]) Art 12(3) , and Annex IV (7) BMVI Regulation

under BMVI, the long-term capabilities needed in 10-15 years' time would not be available, leaving Member States dependent on third countries to procure the technologies and operational capabilities they need.

The interviewees suggested the need for more structural engagement of the stakeholders involved in border management Research and Innovation to ensure this is systematically taken into account at programming stage of BMVI, as well as ringfencing a specific percentage of funding within Member States Programmes for these types of projects.

- Coherence of BMVI with the EU external action

The external dimension of the policy area is first and foremost supported by funding from the External Action spending programmes with an objective to uphold and promote the Union's values, principles and fundamental interests worldwide and to pursue the objectives and principles of the Union's external action. Priorities in EU External Action spending programmes are increasingly linked to EU internal policy objectives, including on migration and internal security.

Regarding BMVI-funded actions in and in relation to third countries, the Commission and the Member States, together with the European External Action Service, shall, in accordance with their respective responsibilities, ensure coordination with relevant Union policies, strategies and instruments ([121]). In particular, they shall ensure that:

- they are carried out in synergy and in coherence with other actions outside the Union supported through other Union instruments;
- they are coherent with external Union policy, respect the principle of policy coherence for development and are consistent with the strategic programming documents for the region or country in question;
- they focus on measures that are not development-oriented; and
- they serve the interests of internal Union policies and are consistent with activities undertaken within the Union.

In this regard, whenever a Member State decides to implement a project with or in a third country with the support of the instrument, it shall consult the Commission prior to the approval of the project ([122]). A procedure has been set through which DG HOME consults the relevant services (INTPA, MENA, ENEST, EEAS, ECHO, FPI) and approves (with or without comments) or rejects the project that has been submitted by the Member State.

Additionally, Member States need to notify the Commission of any bilateral or multilateral cooperation agreement signed with any third country, with which they decide to implement an action with, in or in relation to a third country with the support of the instrument in relation to the monitoring, detection, identification, tracking, prevention and interception of unauthorised border crossings for the purpose of detecting, preventing and combating irregular immigration and cross-border crime or for the purpose of contributing to the protection of migrants and contributing to saving the lives of migrants.

([121]) Article 5(3) BMVI.
([122]) Article 13(12) BMVI.

Regarding the Thematic Facility, coherence is ensured through the interservice consultations with the relevant external action services.

There are however certain challenges in shared management, amongst which the limited impact of the Commission's recommendations as well as the limited ability of the Commission to monitor the implementation of those activities by the Member States. Additionally, Member States need to notify the Commission of any bilateral or multilateral cooperation agreement signed with any third country, with which they decide to implement an action with, in or in relation to a third country with the support of the instrument in relation to the monitoring, detection, identification, tracking, prevention and interception of unauthorised border crossings for the purpose of detecting, preventing and combating irregular immigration and cross-border crime or for the purpose of contributing to the protection of migrants and contributing to saving the lives of migrants.

In this regard, BMVI-funded calls for proposals have been launched under the Migration Partnership Facility (MPF), the EU initiative managed by the International Centre for Migration Policy Development (ICMPD) that aims to strengthen dialogue and cooperation on migration and mobility issues between EU Member States and partner countries. Coherence with other EU funds is ensured through the consultations process that takes place as part of the selection process. This process is aimed to verify complementarity with other projects in the same countries or covering the same thematic areas, and in order to avoid duplications and overlapping. The grant evaluation Committee is composed of DG HOME, DG INPTA, DG MENA, DG ENEST and EEAS, with these services also being members of the overall MPF Steering Committee

An additional coordination mechanism was put in place in 2022, the Operational Coordination Mechanism for the External Dimension of Migration (MOCADEM). It was established under the Council presidency with the objective to exchange on and coordinate the national projects that are funded in third countries by the EU and Member States. External dimension funding is also a regular agenda item at both the Working Party on External Aspects of Asylum and Migration (EMWP) and the Strategic Committee on Immigration, Frontiers, and Asylum (SCIFA). However, all these fora result in limited input from Member States on their national activities, and Member States tend to focus on NDICI rather than HOME funds.

Finally, Partnership Agreements are in place between the EU and third countries, which include a section on coordination and complementarity to avoid overlaps between BMVI funding and other funding instruments.

- As far as coherence with external spending programmes is concerned, and notably the NDICI, enhanced cooperation and coordination on programming both between the Commission services and with Member States are needed. There are several challenges in the current funding architecture that should be addressed, including notably: the need to further strengthen the link between internal and external priorities in the Union's external security funding; 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 security; the limitations for funding border management and visa-related actions in third countries, given that most of spending in the external dimension must comply with the criteria for development assistance eligibility.Coherence with

other emergency instruments: including the Recovery and Resilience Racility (RFF) ([123]) and the Technical Support Instrument (TSI) ([124]).

The stakeholders consulted did not report any overlaps between the BMVI funding and RFF and TSI funding. Interviewees estimated that around 5-10% of RFF proposals (period 2020-2026) are relevant to border management and related fields, such as anti-corruption, or projects related to EU-LISA. Coherence in these cases is ensured through consultations between DG HOME Unit A1 (Policy Coordination & Interinstitutional Relations) and the Recovery and Resilience Task Force (RECOVER) within the Secretariat-General of European Commission. and DG ECFIN. DG HOME reviews the RFF work programmes (as part of the Inter-service consultation),and is also consulted upon the adoption and amendment of national plans. Similarly, feedback from DG ECFIN and RECOVER on the BMVI work programmes is ensured through the Inter-service Consultations. As confirmed by interviews, TSI and BMVI complementarity is rare, instead this instrument is more relevant to AMIF and actions funded by the EUAA. TSI had a dedicated call on the Migration and Asylum Pact, to support Member States with the preparation of their national implementation, which complements the BMVI National Programmes. Coherence is ensured through the Inter-service consultation, in which DG REFORM (in charge of the TSI) provides feedback to DG HOME Unit A1.

- Coherence with other EU funding instruments: the Justice Programme, the European Social Fund Plus and the European Regional Development Fund.

Stakeholders consulted noted that the synergies between BMVI and ESIF (2021-2027) were limited: In terms of beneficiaries, the authorities involved in ESF+ and ERDF are different from the beneficiaries of the BMVI. Moreover, the types of activities funded are more closely linked to AMIF, in that the ESF+ and the ERDF can help facing the migration pressure experienced by the EU, by supporting long-term integration of migrants.

Similarly, stakeholders consulted noted the synergies between BMVI and the Justice programme were limited, as the Justice Programme has distinct focus and covers different beneficiaries (in the area of police and judicial cooperation).

For both cases, coherence is mostly ensured through the interservice consultations on the BMVI, which include DG JUST and DG EMPL and DG REGIO. **Even though most interviewees were positive about the coordination mechanisms to ensure coherence with the EU external action, several of them found that the coordination processes should be strengthened, as it is currently heavily based on good ad hoc coordination**. This is particularly relevant since the external dimension of border management is bound to become more relevant with the implementation of the Pact on Migration and Asylum.

([123]) The RRF is a temporary instrument that is the centrepiece of NextGenerationEU -the EU's plan to emerge stronger and more resilient from the current crisis.Through the Facility, the Commission raises funds by borrowing on the capital markets (issuing bonds on behalf of the EU). These are then available to its Member States, to implement ambitious reforms and investments that:

1. make their economies and societies more sustainable, resilient and prepared for the green and digital transitions, in line with the EU's priorities;
2. address the challenges identified in country-specific recommendations under the European Semester framework of economic and social policy coordination.

([124]) The TSI provides tailor-made technical expertise to EU Member States to design and implement reforms. The support is demand driven and does not require co-financing from Member States. It is an important pillar of the EU's initiative to help Member States mitigate the economic and social consequences of the outbreak of the COVID-19 crisis.

- Challenges to coherence

There is a lack of awareness amongst Managing Authorities and stakeholders about the elements of complementarity between the funds, and about the possibilities to make use of them. This potentially hinders the development of synergies between the instruments.

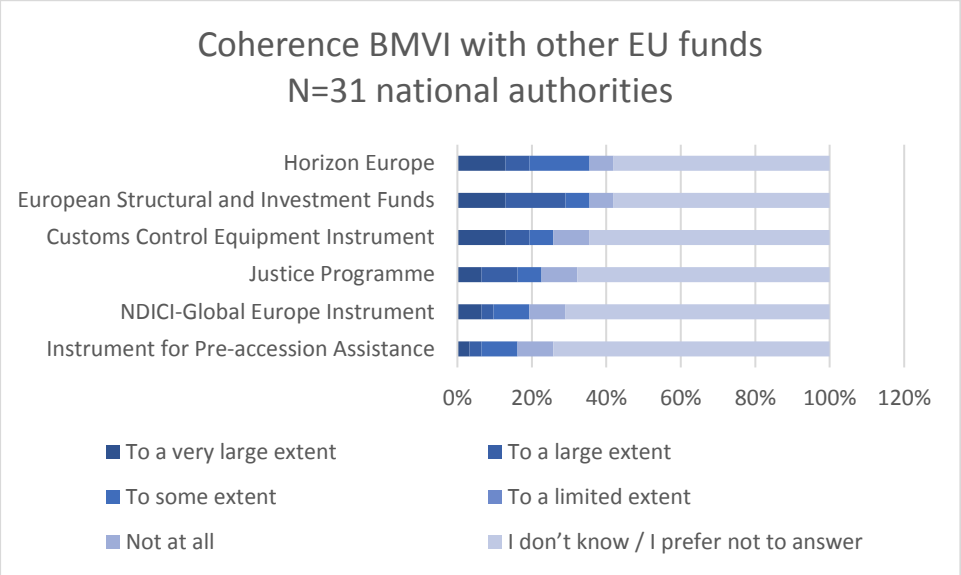
Most of the national authorities consulted through the online survey (58-75% depending on the EU funding instrument) did not feel they could answer the question whether the actions implemented through BMVI were coherent with other EU funding instruments. This could either mean these authorities are not familiar with these other EU funding instruments or a lack of mechanisms to identify and exploit opportunities to create synergies between the EU funds. This was also apparent in the country case studies: in which none of the stakeholders interviewed highlighted synergies or overlaps between BMVI and these other EU funding instruments.

Of those that were able to answer the survey question, the majority was positive, noting BMVI actions were coherent to a large or very large extent with other EU funding instruments. Respondents were most positive about coherence with Horizon Europe and ESIF. Only three national authorities thought there was no coherence at all between BMVI and IPA, NDICI, the Justice Programme and CCEI, and only two believed no coherence existed between BMVI and ESIF and Horizon Europe.

As far as coherence with external spending programmes is concerned, and 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 assistance ([125]) eligibility.

([125]) Official development assistance eligibility criteria is set by the Organisation for Economic Cooperation and Development.

Figure 19: Responses to the survey question: In your opinion, were the actions implemented through the ISF-BV and BMVI instruments coherent with and non-contradictory (no duplications or overlap) to other EU interventions with similar or complementary objectives? (N= 31 national authorities)



Source: Preparatory study, targeted survey

The survey with beneficiaries and "other stakeholders" showed similar results, with the majority answering they "did not know", followed by respondents that responded positively (and most positively about ESIF and Horizon Europe).

In general, there is the perception that information is insufficient and communication between actors could be improved, notably in fields like Research and Innovation, where stakeholders perceive that there should be room for strengthened coordination.

One interviewee noted that the coordination with the funding of equipment under the Customs Control Equipment Instrument (CCEI) was challenging, as BMVI mostly funds equipment through shared management, while under CCEI this is implemented through direct management. The different methods of implementation can only be efficiently combined through an active coordination.

4.2. How did the EU intervention made a difference and to whom?

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.

The evaluation shows a strong consensus among national authorities on the importance of EU support for border management and visa policy and underscores the EU's essential role in maintaining security and visa management across the Union. ([126])

Member States highlight the role of BMVI in improving their integrated border surveillance and control mechanisms. Projects such as the deployment of advanced surveillance equipment and the development of integrated border management systems have markedly bolstered border security. For instance, Bulgaria's Integrated Surveillance System (ISS) and Finland's procurement of Border Guard equipment exemplify how EU funding elevates national capabilities to meet EU-wide security standards. Similarly, countries such as Poland have benefitted from such assistance to enhance border security through ICT upgrades. ([127]) Mid-term evaluation reports further highlight how EU instruments are essential for initiating projects that national resources alone cannot support.

Improvements in cross-border cooperation and the development of national surveillance systems were also specifically mentioned by the national authorities responding to the survey as key additional positive effects of BMVI projects, which directly contribute to enhancing national capacities to meet EU security. ([128])

Evidence suggests that an essential added value brought about by BMVI is the alleviation of pressures on the national budget. Countries such as Cyprus, Estonia, and Malta rely heavily on EU instruments to undertake critical projects that would otherwise be delayed or deprioritised. This funding not only ensures timely project completion but also allows for broader and more ambitious initiatives than national resources alone could support. ([129]) The mid-term reports also show that the EU support provided via BMVI brings additional credibility to national budget requests, helping to secure continuing national funds for border management projects. For instance, Cyprus, demonstrates a critical reliance on EU instruments to fulfill obligations tied to EU border management policies. Moreover, in countries such as Croatia, the EU support allows to broaden national priorities, and without such support, funding would be limited to the most essential requirements for obligations towards Schengen standards, thus reducing the quality of work being done in relation to border security and visa.

Lastly, evidence from desk research shows that the funding enhances the operational efficiency and predictability of recipient administrations. Projects in countries such as Finland and France have improved maritime surveillance and visa processing capabilities, contributing to overall EU security and policy goals. ([130]) For instance, France's renovation of the Dieppe semaphore monitoring room and the acquisition of coastal maritime surveillance boats enhance its ability to monitor and secure its maritime borders effectively. Moreover, the mid-term evaluation reveals that countries such as France, Italy,

([126]) Online survey question "How important is for EU to continue providing support in the area of border management and visa policy?" national authorities (n=51): Very important [75%, 38]; Important [8%, 4]; Somewhat important [4%, 2]; Not very important [0%, 0]; Not important at all [0%, 0]; I do not know / I prefer not to answer [14%, 7].

([127]) Mid-term evaluation reports: 3 Member States.

([128]) Online survey question "In addition to benefits brought to planned end-beneficiaries, have you noticed further positive effects due to the BMVI projects (to date)?" national authorities (n=30). This survey question was an open question.

([129]) Mid-term evaluation reports: 3 Member States. Country case study consultations: 5 Member States.

([130]) Mid-term evaluation reports: 8 Member States.

and Lithuania experience a scale effect, where the combination of EU and national resources leads to a more significant impact on border management and surveillance capabilities.

National authorities also identified the development of IT systems as a major positive outcome of BMVI-funded projects. Smart border technologies, as well as technological innovations, such as the further development of Eurosur which facilitates real-time information sharing and cooperation between Member States, were highlighted. ([131]) Interestingly, project development timelines were sometimes considered a positive difference, as they push Member States to implement IT systems more efficiently. ([132])

Another beneficial effect for Managing Authorities and stakeholders lies in the enhancement of cooperation between participating countries and the promotion of harmonized procedures. BMVI-funded operations promote more aligned and consistent procedures across borders, making it easier for Member States to collaborate effectively. ([133]) Similarly, beneficiaries largely acknowledged increased cooperation and contact between Member States and other authorities involved due to BMVI projects, which is key to harmonising procedures and improving coordination across borders. ([134])

Finally, EU support encourages the adoption of common strategies and innovative approaches that would not be feasible without external support. For instance, the Union Action IMPROV-EU is being implemented and aims to develop and disseminate an innovative protocol, based on good practices, to streamline the implementation of the provisions related to persons in vulnerable situations of the EBCG Fundamental Rights Strategy at the national level in multiple Member States. ([135])

4.3. Is the intervention still relevant?

In general terms, the instrument still responds to the needs identified at the beginning of the programming period in order to achieve the overall objective of ensuring 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.

The evaluation concludes that there is an essential continuity in the relevance of the needs identified during the preparation of the instrument, during the programming stage at

([131]) Online survey question "Which EU-funded initiatives would represent a significant contribution in the future in the areas of border management and visa policy?" national authorities (n=30). This survey question was an open question.

([132]) Online survey question "In addition to benefits brought to planned end-beneficiaries, have you noticed further positive effects due to the BMVI projects (to date)?" national authorities (n=30). This survey question was an open question.

([133]) Online survey question "Which EU-funded initiatives would represent a significant contribution in the future in the areas of border management and visa policy?" national authorities (n=30). This survey question was an open question.

([134]) Online survey question "In addition to benefits brought to planned end-beneficiaries, have you noticed further positive effects due to the BMVI projects (to date)?" Beneficiaries (n=28). This survey question was an open question.

([135]) Thematic case study on Union Actions.

Member State level and in the preparation of the Commission's work programmes for the Thematic Facility.

BMVI's objectives, actions, and scope are sufficiently broad to enable flexible implementation of activities in border management and common visa policy, effectively addressing the diverse needs of Member States. This was confirmed through interviews, the survey analysis and the mid-term evaluation reports, where there was general agreement that the BMVI instrument continued to meet national and stakeholders' overarching and specific needs (introduced above and further elaborated below) throughout its implementation.

Member States and other stakeholders find the actions supported by the BMVI relevant and addressing real needs - both structural long-term needs and emergency needs – but also that needs significantly exceed the financial envelope of the instrument.

The volume of issues to be addressed by the instrument has increased during the programming periods, reflecting several factors, including the impact of the Russian war of aggression in Ukraine, instrumentalisation of migrants, and the economic context and budgetary pressures faced by Member States. Certain gaps have been identified, e.g.

- Some national authorities highlighted that the Union's contribution to their Member State Programme and the EMAS funding was insufficient to cover all planned projects, especially in light of the increased demands that some countries experience due to increased migratory pressure at their external borders. However, it should be noted that BMVI is only intended to *support* Member States, and not to cover the full implementation of all planned projects.

- The need for faster development and implementation of planned large-scale IT systems (in particular, EES and ETIAS).

- The need for innovation to allow for a more secure border process as per the Smart Borders Package. National authorities noted the need for more funding in the ICT sector to address new security risks and challenges (e.g. document fraud, identity theft, cyber threats, etc.).

- Building/infrastructure and equipment: the need for more support in terms of construction, including fences/physical barriers at the border, which are not currently funded under BMVI was also highlighted by national authorities. This is due to a political decision by the European Commission not to fund the construction of fences.

- Operating support/running costs: National authorities consulted considered that needs for additional operational support to cover running costs were not sufficiently addressed under BMVI (i.e., a need for more funding to cover operational costs beyond the current maximum set at 33% of total funding which can be allocated to operating support)

- Stakeholders find that the Thematic Facilities provide flexibility, focus on the key priority needs and key target populations and make it possible to address emergency situations.

The specific architecture of the instrument, and its three components, appear as a substantial contribution to the flexibility of the instrument to adapt to the changing context in which interventions take place. This has been acknowledged by all actors.

Member State programmes address Member States' structural and long-term needs in border management and visa policy. They provide stable funding planned across several years to address overarching as well as specific needs. This conclusion is supported by the mid-term evaluations of the Member States. This was also confirmed through the surveys, which evidenced the strong relevance of BMVI for national authorities, beneficiaries and other stakeholders, including its objectives and the type of activities funded under the instrument.

The design of BMVI's enables Member States to tailor their Member States Programmes to their needs thus ensuring the relevance of the instrument. These needs were identified by Member States at the beginning of the period, although the engagement of beneficiaries and relevant stakeholders in this initial needs' assessment shows substantial variation.

As evidenced through the country case studies, needs assessments are a consultative process combining both a bottom-up approach (consultation with different actors from managing authorities to beneficiaries) as well as a top-down approach (defining priorities based on strategic documents and concepts). For instance, in Greece, it included a dedicated Policy Dialogue between key stakeholders to define the national strategic guidelines and specific objectives of the Programme. The Managing Authority identified key programme stakeholders based on the experience from the ISF-BV and consulted them to gather their feedback through a dedicated workshop and through a consultation process where stakeholders could contribute with their concerns, comments, and proposals.

In this regard, while some actions funded through the programme were deemed less relevant than others and some needs unmet, all stakeholders consulted highlighted the strong relevance of the Member States Programmes in addressing their national needs.

The Thematic Facility allows steering funding towards priorities with the highest Union added value and often linked to unexpected developments:

- **Specific Actions** concern actions which require cooperation among Member States or actions necessary to address developments in the Union which require additional funding to be made available to one or more Member States. They thus address both the needs of the EU and its Member States, as confirmed by stakeholders. An indicative example provided by one national authority was the "Support to Member States for Smart Borders" ([136]) which provided Greece with needed (and unexpected/planned) additional support for the financing of the ETIAS and SIRENA systems. ([137]) Similarly, the flexibility conferred by Specific Actions in addressing evolving challenges was also evidenced in Poland, where the rapid shift in priorities due to the Belarusian border crisis required a reallocation of resources initially intended for the Ukrainian situation. This demonstrated the flexibility of Specific Actions that can quickly adapt to emerging challenges.

([136]) Reference no: BMVI/2024/SA/1.5.1

([137]) This action has been approved by the EU but has not yet been included in the Member State Programmeas of September 2024

However as evidenced through the Specific Action thematic case study, their relevance has been limited by various administrative, financial, and operational challenges. A consistent theme across multiple Member States is that, while Specific Actions provided essential support in addressing national priorities, they often did not fully cover the breadth of these needs due to limited funding, unclear timelines, and complex administrative processes. Moreover, several national authorities also raised concerns regarding the alignment between Specific Actions and their countries' needs, particularly because the funding for these actions cannot be factored into the policy formulation process, making it more challenging for national authorities to fully integrate these actions into their (long term) broader border and visa management strategies.

- EMAS addresses EU and Member States' needs for an instrument which can provide funding to respond to pressing and emerging challenges/emergencies in a timely manner (e.g., the Russian War of Aggression in Ukraine resulting in a mass influx of displaced persons from Ukraine, requiring a significant increase in the capacity of Member States, especially the ones at the frontline of the crisis to rapidly strengthen their migration and external border management systems.) As confirmed through the thematic case study on the topic, EMAS addresses this need by providing emergency funding to assist Member States in reinforcing their capacity to respond to emerging crises characterised by large or disproportionate numbers of arrivals or by incidents which have a decisive impact on border security. EMAS provided EUR 124 million financial support to four Member States (Hungary, Poland, Romania and Slovakia) under BMVI to address emergency situations related to the Russian War of Aggression in Ukraine and the mass influx of displaced persons. Stakeholders consulted positively assessed the flexibility of EMAS in that regard. In particular, under BMVI, Member States now have the possibility to receive Emergency Assistance under shared management as part of their Member States Programmes. While never used, the possibility offered by these so-called "top-ups" was positively assessed by interviewees – but remains unverified. In addition, unlike other funding mechanisms, EMAS does not operate under rigid predefined criteria. Instead, it can be used to fund a wide scope of activities as needed by the applicant to respond to an emergency situation. Each funding request is assessed on a case-by-case basis, allowing for tailored flexible support. Moreover, while EMAS funding is originally granted for a period of 12 months, emergency assistance is provided for as long as the emergency situation lasts, allowing for additional funds to be received and extension granted.

- Union Actions provide complementary funding to respond to emerging transnational needs and capture/finance projects/activities that are in the collective interest of the EU. However, the findings from the Union Actions thematic case studies highlighted that a lack of willingness and/or ability by stakeholders to buy in on the experience built through Union Actions, may result in reduced benefits. Additionallly, interviews conducted as part of the country case studies confirmed that while there may be an appetite for Union Actions in theory (thus highlighting their relevance), when required, working transnationally was not straightforward for national authorities and not perceived as a priority compared to their national needs.

The instrument has been able to adapt successfully to new and pressing needs, in particular those related to the war in Ukraine, thanks to the flexibility of its structure and delivery methods.

It is difficult to assess the actual effectiveness of the measures supported in the Member States at the forefront of the Ukrainian cases. However, the case study shows that the existence of a flexible Thematic Facility and, in particular, the use of emergency assistance under a financing not linked to costs approach allowed to quickly mobilise resources that substantially reinforced the capacity of those Member States to face the consequences in terms of border management. The funds were made available quickly (much quicker than in case of national programmes or Specific Actions – as stakholders noted), and the procedure was not challenging. Stakeholders noted that after the decision to make the funding available, the process ran smoothly and quickly. The application was not challenging for applicants and could be developed in a timely manner. Most stakeholders interviews highlighted that this was exactly what was needed at that particular moment of an emergency situation when most institutions dealing with border management (ministries of internal affairs, border guard, border police) had other priorities, had to manage the influx of refugees and staff was often delegated directly to the border.

5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

5.1. Conclusions

As explained in the introduction, given the early stage of implementation of the member state programmes, which were only adopted end of 2022, the mid term evaluation is particularly focused on the identification of issues which may affect the implementation of the instrument, and on ways to reassess the programmes, if necessary. While addressing the main evaluation criteria of relevance, effectiveness, efficiency, coherence, and EU added value, the evaluation aims less at obtaining final conclusions on the effectiveness and efficiency of the programmes, than at obtaining evidence-based information on:

- Whether the instrument is addressing the needs it was meant to address, and whether it has been able to tackle new needs resulting from new challenges and developments in the policy context;

- whether the Member State programmes and the Commission work programmes for the Thematic Facility are fit for purpose and coherent with other national and EU funding instruments, and whether improvements should be introduced;

- whether the interventions are on track to achieving the stated objectives, at a reasonable cost, and which possible corrections may be introduced during the rest of the implementation of the interventions.

This section aims at summarising the conclusions regarding the five evaluation criteria

Effectiveness

At different speeds, the interventions funded are on track to achieving the stated objectives.

BMVI has made financial progress in implementing activities under Specific Objective 1 (Border management) reflecting the strong commitment of Member States to enhance border control. Regarding Specific Objective 2, the progress towards the achievement of the objectives is clearly slower, likely as a result of the need to address the consequences of the Russian war of aggression in Ukraine in terms of border management and reception capacities.

In terms of performance, reporting has only recently started and it is not possible to come to conclusions on effectiveness yet. Logically at this stage, achievements in terms of meeting the 2024 milestones for common output and results indicators are very uneven across both Member States and the different areas of BMVI interventions. This is explained by different paces in implementation, but also by inconsistencies in what exactly is measured, as well as inappropriate definition of initial targets.

Apart from the obvious lack of actual information on performance at this stage, with regard to programmes of Member States, the monitoring and evaluation framework is affected by several shortcomings:

- There is the Managing Authorities' lack of familiarity with a continuous monitoring and reporting system.
- There is the Managing Authorities' insufficient understanding of the components of the monitoring system.
- In several case the methodologies for target setting methodologies did not adequately address the objectives of the programmes.
- Annual performance reports miss the aim of efficiently sharing key messages on practical implementation.

The case studies on EMAS and Ukraine conclude that emergency assistance effectively contributed to support countries in deploying interventions to face the crises that appeared even before the adoption of the programmes. This is notably the case for the consequences of Russia's war of aggression against Ukraine and the instrumentalization of migrants at the Belarus border.

On the involvement of partners, there seems to be room for a more consistent approach to the involvement of partners. It has been argued that border management and visa policy, and the activities involved, leaves little ground for the participation of many of the social actors envisaged in the CPR. However, the activities carried out at the external borders of the Union have an impact on the free movement of persons and goods, as well as the internal security of the Union, affecting economic actors such as travel agents, air carriers and transport professionals.

When it comes to the respect of the horizontal principles defined in the CPR, they have been considered in the preparation and implementation of the programmes. However, the case studies and the consultations done show that there are few mechanisms to monitor the application of these principles.

In terms of communication and visibility, all participating Member States have fulfilled their obligations, but it is too early to measure the effectiveness of these measures in reaching their targets.

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. However, adjustments are still needed to fully ensure an efficient delivery of the funding and reduce the administrative burden.

The BMVI has embedded cost-effectiveness elements at all levels in its design, through the implementation of rigorous project selection and procurement mechanisms. There is insufficient evidence of effectiveness at this stage to carry out a comprehensive cost-effectiveness analysis of operations in any management mode.

The progress in financial implementation, though at different speeds, seems to confirm that programmes are being implemented efficiently from an operational point of view, since at the mid term stage, the programmes had committed an amount equivalent to the whole allocation in the previous instrument, ISF-BV.

Implementation rates across Specific Objectives are moving at different speeds, leading to confirm a different pace in the effective completion of the activities and potential future challenges in the achievements of the fund's objectives.

An assessment of the system's architecture and design suggests that the system is structured to operate with efficiency. Based on the desk research and stakeholder consultations conducted, management and control systems are designed with clearly assigned roles and responsibilities at both EU and national levels.

Early insights from mid term evaluations across the Member States and stakeholder consultations have highlighted concerns regarding the administrative burden, which may affect both Management Authorities and beneficiaries. Factors that may affect this perception are:

- The need to adapt to a new legal structure, as a result of the transition to the CPR.
- A stability in the level of human resources at Member State level, as compared to the previous instrument, having to take care of notably increased budgets.
- The learning curve to adapt to new reporting mechanisms and tools, which may be reduced with time.

A particular case where the advantages introduced by the instrument are appreciated are the Specific Actions. Stakeholders consider that they make a difference in terms of flexibility and provision of ad-hoc additional funding for specific priority interventions. Some cases of gold-plating may however have been identified at Member State level.

Technical assistance is consistently appreciated as a positive contribution to the effective and efficient implementation of management and control systems. Under the CPR, technical assistance is provided as a lump sum of six percent of the eligible expenditure included in each payment application. This amount is allocated to a specific objective in BMVI programmes and may support actions, which may concern previous and subsequent programming periods, necessary for the effective administration and use of those Funds, such as, inter alia, preparation, training, management, monitoring, evaluation, visibility

and communication ([138]). This approach provides reinforced flexibility when addressing these operational functions in the programmes.

To face the potential administrative burden, Managing Authorities know of the simplification possibilities in the CPR, in particular related to simplified cost options and financing not linked to costs, but are not fully aware of how they work, which leads to a limited buy-in in some cases.

The establishment of IT systems at Managing Authority level is a promising way of ensuring more streamlined communication and reporting, shortening the duration of the processes and the administrative workload.

Relevance

The instrument is addressing the needs it was meant to address and has been able to respond to new challenges and developments in the policy area.

All consulted stakeholders agree that the instrument is still relevant for the needs identified in the definition of the instrument and translated into the overall 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.)

Both Member States and stakeholders consider that the interventions supported by the BMVI address the most important needs - both structural long-term needs and emergency needs-, even when these needs have been evolving. Moreover, the mid-term evaluations and stakeholder consultations suggest that the recent geopolitical crises and its impact on migration flows, and border management have marked a shift in Member States towards measures aimed at strengthening EU's external borders, to the detriment of the needs related to the development of the common visa policy.

The specific architecture of the instrument, with its four components (Member State programmes, Specific Actions, EMAS and Union Actions), appears as a strength in this capacity to react to emerging needs. This architecture has permitted to fully apply the flexibility of the instrument to adapt to the changing context in which interventions take place. This has been acknowledged by all actors, in particular as regards the response to new and extremely pressing needs, such as those related to the war in Ukraine.

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 funding instruments.

The BMVI's architecture is fit for purpose as it enhances internal coherence by fostering complementarity across components. The combination of the four components of the instrument (Member State programmes, Specific Actions, emergency assistance and Union Actions) and the three management modes (shared, direct and indirect) enables flexible fund management.

There are, however, limited instances where the strategic approach to complementarity between Specific Actions and the regular actions in the programmes could be better

([138]) Art. 36 BMVI Regulation.

developed to support complementarity. Similarly, barriers to working transnationally were identified for the uptake of Union Actions that undermine their specific focus.

There are formal and informal mechanisms in place at both EU and national level to ensure complementarities and, where relevant, synergies across the different components. These occur at planning stage but are also built into their day-to-day management. Nevertheless, these mechanisms could be strengthened, particularly for Union Actions, where a higher uptake of lessons learnt and systematic sharing of results across Member States could possibly reinforce other elements of implementation.

The BMVI is also coherent with, and therefore contributes to, supporting the different components of the border management and visa policy. Some stakeholders emphasised the importance of the alignment between the BMVI and the national capability roadmaps, in order to ensure the continued coherence of the BMVI with the EBCG Regulation and EIBM Strategy.

A common migration and asylum system is key to supporting the area without controls at internal borders. The three Home Affairs funds need to be acting complementarily to achieve the overarching objective of a fully functioning Schengen area. This complex interdependence requires clear priority setting at national level and adequate level of Commission steering where relevant, good coordination between all actors involved in the programming and implementation of national and EU funds. The aim is to ensure that the funding effectively contributes to achieving the overall policy objectives in an optimal manner contributing to economies of scale.

This interdependence creates challenges for the delivery of the overall policy objective but also brings opportunities for enhanced synergies and coordination. Stakeholders consulted held positive views on the coherence between BMVI and the other HOME Affairs funds (ISF and AMIF), although there is not always full awareness among national level stakeholders as to how synergies could be created (such as the use of the CPR provisions on multipurpose funding of equipment).

As regards the coherence between the BMVI and other EU funds (ERDF, ESF+, CCEI)), it is conceptually sound and understood in general by stakeholders. However, coordination mechanisms are sometimes not fully effective, and the potential for synergies and complementarities are not always visible to Managing Authorities, stakeholders and beneficiaries.

In the case of Horizon Europe, the potential of BMVI funding to increase the uptake of innovative technological solutions at the level of EU and national programmes is not fully developed. EU funding could contribute further to ensuring that the concepts and tools developed under Horizon lead to longer term testing and validation, and eventually ensure these capabilities are available to procure on the EU market.

Finally, even though most interviewees were positive about the coordination mechanisms to ensure coherence with the EU external action, notably as regards NDICI and IPA, several of them found that the coordination processes should be strengthened, as it currently heavily based on good ad hoc coordination.

EU added value

The BMVI's added value lies in its ability to support projects extending beyond the financial and operational capacities of individual Member States.

The evidence collected through consultations and case studies indicates that the BMVI provides an added value by supporting projects that go beyond the financial and operational capacities of individual Member States. Stakeholders agree that by fostering cooperation, ensuring compliance with EU standards, and alleviating national budget constraints, the instrument significantly enhances the EU's collective border management and visa policy framework.

The evaluation shows a strong consensus among national authorities on the importance of EU support for border management and visa policy and underscores the EU's essential role in maintaining security and visa management across the Union.

5.2. Lessons learned

The flexibility of the instrument is an essential component in ensuring the achievement of its objectives, also considering the changing context of implementation. This flexibility should continue to be available as it allows meeting unexpected needs in a smooth and quick way.

To make the most of the relevance of BMVI, it would be important to further reinforce the complementarity and coherence between its different components, creating the right instruments for coordination at EU level, but especially at the level of the participating Member States. The preparation of Specific Actions should be done with a strategic view, aimed at avoiding overlaps or inefficiencies. Additionally, innovative methods and approaches developed through Union Actions should continue to be promoted by the Commission to make sure that Member States and stakeholders are aware and take advantage of them. In terms of progress, BMVI has achieved significant operational progress in the implementation of its first specific objective (border management). It is important that the implementation of the objective to reinforce visa policy does not lag behind.

There seem to be significant shortages in staff or resources in the implementation and monitoring of the programmes, which are mostly running at the same level of resources as they did in the previous programming period. This issue needs to receive attention in order to avoid inefficiencies that would compromise the achievement of BMVI objectives.

Regarding the implementation of the horizontal principles, it is worth considering the need to reinforce its promotion and monitoring during the implementation of the programmes.

There is potential room for simplification using the possibilities offered by the CPR and the benefits of streamlined IT systems. These possibilities are still underused and could be further promoted in order to facilitate administration and implementation. Moreover, cases of gold plating have been identified by the evaluation. This should be consistently addressed in order to contribute to reduce the administrative burden to the strict minimum.

Coordination with the other EU home affairs funds could be further reinforced. This seems particularly relevant in view of the implementation of the Pact on Migration and Asylum.

At national level, mechanisms that ensure an appropriate awareness of the possibilities and of the other funds would contribute to a more efficient planning and design of the interventions.

In the same manner, there should be means at the disposal of the Commission and the Member States to make the most of the work done in terms of research and innovation in the migration and border management field. There is room for further reinforcing the continuum between research and implementation.

As regards the relation between BMVI interventions and external actions, there is an overall perception that the mechanisms exist but work on a mostly ad-hoc manner. A reflection should take place on how to enhance the complementarity between BMVI and external actions, and how to further underpin a strategic approach to this aspect.

There is a need to reinforce the understanding of the performance framework of the BMVI regulation. While Managing Authorities have formally complied with their obligations, there is a lack of common understanding about the system, its use and its implementation. It would be useful to launch a general reflection in terms of target setting, as well as support the Member States in supplying more reliable and up-to-date information about the progress made. It would also be relevant to explain better to Managing Authorities how the performance framework can contribute to the management of the programmes, beyond the purely formal reporting that is required by the regulation.

This is a precondition to an improvement in quality of the system, so that it is fully able to provide the relevant input for the retrospective evaluation of the programme. To this end, the Commission will continue to follow up the reporting of implementation data and provide ad hoc recommendations to ensure the quality, consistency and reliability of the information on performance.

Finally, a more inclusive approach to the principle of partnership, as defined in the CPR would possibly consolidate the broader added value of BMVI. The objectives and benefits of the instrument have a wider scope than the purely operational implementation of border controls and surveillance, or the processing and monitoring of visa permits. It seems that a better engagement of partners through a better coordination of their actions would benefit the implementation of BMVI. Increased stakeholder engagement would allow a stronger collaboration with all partners in the implementation of the programmes, including exchanging good practices and advice as well as experiences in the field.

ANNEX I: PROCEDURAL INFORMATION

This evaluation has been carried out by DG HOME, as responsible for the implementation of BMVI in the Commission. The evaluation was launched May 2023.

The evaluation has been carried out in accordance with the rules of Better Regulation, by applying the methods and requirements established in the Toolbox. However, given the early stage of implementation of the funds when carrying out the evaluation, and the limited evidence available in terms of effectiveness of the funds, it has not been possible to carry out a fully-fledged cost-benefit analysis as required by the Better Regulation guidelines. Some elements are provided though as annex IV to this document.

The evaluation was also based on the orientations provided by DG HOME to the Member States regarding the mid term evaluation, in particular, the evaluation questions with indicative judgment criteria presented to the Managing Authorities during a webinar on 19 April 2023. Both the programmes' and the Commission's mid term evaluations are based on the same set of questions and indicative methodological elements.

The evaluation has been steered by an Interservice Group, with the participation of the operational and policy units in DG HOME, as well as the following DGs and services: SG, DG BUDG, DG INTPA, DG JUST, DG REGIO, DG RTD, DG DEFIS, JRC, SJ, DG ECHO, DG TAXUD, DG EMPL, DG MARE, and OLAF.

The first meeting of the Interservice Group was held on 30 June 2023. During the meeting were discussed the Specifications for the preparatory study to be carried out with the assistance of external consultants. Additional meetings of the Interservice group took place to discuss the deliverables of the preparatory study on 11 March 2024, 13 May 2024, 23 July 2024 and 25 October 2024. The draft version of this Staff Working Document was submitted to the group in written consultation on 17 December 2024.

The preparatory study was confided to a consortium made up of EY France, Fondazione Brodolini and Tetra Tech, following an open call for tender launched on 3 October 2023. The contract was signed on 27 February 2024.

The evaluation is mostly based on the work done during the preparatory study, as explained in Annex II and III, in line with the requests in the Specifications drafted by the Commission.

Opinion of the Regulatory Scrutiny Board

The draft Staff Working Document was submitted to the Regulatory Scrutiny Board during its meeting of 12 February 2025.

The Board issued a negative opinion based on a number of weaknesses and identified some recommendations for improvement.

The RSB identified the following key issues:

(1) The findings do not reflect the limited evidence, data gaps and limitations. The report does not sufficiently analyse the significant variations in degrees of implementation among the Member States. It is not clear what the baseline for measuring progress towards achieving the objectives is, considering the absence of evaluation of the Fund's previous programming period 2014-2020.

(2) It is not sufficiently clear in the report whether the monitoring and evaluation framework in place will allow for robust conclusions to be drawn in the final evaluation of the program.

(3) The report does not sufficiently analyse the administrative costs.

(4) The assessment of coherence with the Pact on Migration and Asylum and other EU funds is not sufficient. The report does not adequately assess the additionality of the BMVI to the broader efforts of the Member States in these policy areas.

The follow up to the above issues and the Board's more specific suggestions on what to improve are displayed in the table below.

Recommendation	**Follow-up**
The report should more systematically refer to the existing evidence base and bring in more elements from the support study and case studies.	References to the evidence from which findings and conclusions are drawn have been consistently reinforced through the document.
The conclusions should be more nuanced and better aligned with the evidence available and its limitations. In particular, the conclusions on effectiveness and efficiency should be more clearly linked to available evidence	This has been applied through the report.
Reporting on progress in financial implementation is not sufficient as evidence of the effectiveness and efficiency, and to allow to conclude that the programme is on track to achieve its objectives.	Limited information on achievements was expected from the outset of the evaluation process, this being a mid-term evaluation that comes too early in the implementation of the Instrument to draw significant information on effectiveness and efficiency. This fact that evidence on the progress of the operations was unlikely to suffice for a sound investigation on the net effects or impacts of the fund, and the focus should lie on whether the current programming and implementation arrangements appear conducive to effectiveness as implementation unfolds, was acknowledged by the ISG at the start of the work in this evaluation. The progress in financial reporting has not been considered in the evaluation as evidence of effectiveness. The evaluation concludes that "The progress in financial implementation, though at different speeds, seems to confirm that programmes are being implemented efficiently from an operational point of view, since at the mid term stage, the programmes had committed an amount

Recommendation	Follow-up
	equivalent to the whole allocation in the previous instrument, ISF-BV." This has been clarified in the conclusions (p. 69). On p. 22, the reference to implementation being on track does not refer to the fact that objectives will be achieved. It is made clear that there are still challenges and the evaluation has not enter into an assessment of effectiveness. Additional information to explain this finding has been provided on p. 23.
The report should be clear about the baseline and describe also in quantitative terms how progress towards attaining objectives is measured and against what baseline.	Additional information has been provided in the section on points of comparison, regarding the performance framework and the way of measuring progress.
As far as possible the report should refer to the results of the final evaluation of the funds under the previous programming period.	As explained in the revised version (section 2.2): "Even if the mid-term evaluation focuses mostly on the situation, achievements and progress during the initial implementation of BMVI, the evaluation of the previous programming period might have been a useful input in terms of comparison. As a response to the Russian war of aggression to Ukraine, the implementation period of the Home Affairs Funds 2014-2020 was extended by one year, to allow the Member States to fully use any unspent amounts under the 2014-2020 programmes. Accordingly, the final implementation period ended on 30 June 2024; the national ex-post evaluations were due on 31 December 2024 and the Commission ex post evaluation on 30 June 2025 (Article 1(5) of Regulation (EU) 2022/585 of 6 April 2022). Therefore, the ex-post evaluation study was still ongoing at the time of drafting this Staff Working Document, and its findings and conclusions could not be used. Nevertheless, as explained in chapter 1, both the mid-term and the ex post evaluations were implemented simultaneously, in order to maximise synergies. Some tools, such as the case studies, the surveys and the interviews were common to both evaluations. Accordingly, elements from the ex post evaluation are by definition part of the mid-term and vice versa, since these specific tools looked at

Recommendation	Follow-up
	implementation as a continuum. This has allowed to have retrospective view, as well as complying with the requirement in the BMVI regulation ([139]) to take into account the results of the retrospective evaluation for the 2014-2020 period."
The report should analyse the different degrees on implementation among Member States and underlying causes.	This has been reinforced in section 4.1.1., within the limits of the information available at this stage. As explained in the chapter, the different degrees in implementation seem to be linked to the different implementation rhythms in each Member States as well as to the impact of the external context, notably the Ukrainian crisis, in the selection of projects to be prioritised. It is useful to highlight that data available at the cut-off date point (30 June 2024) in terms of implementation and performance do not necessarily reflect the actual progress of implementation. Since transmission of performance data occurs twice a year, and is not aligned with the provision of financial information, there is always a gap between two, which may provide a distorted view of actual implementation levels.
The report should describe in more detail the monitoring and evaluation framework in place and assess the extent to which the data collected will allow to track progress on all elements of the intervention logic and will allow to evaluate the achievement of the programme's objectives in the final evaluation. It should be explicit about data and information that Member States provide in their regular reporting and identify any issues or gaps that would need to be addressed.	This has been reinforced in sections 2.2, 4.1 and 5.2
The report should provide more details and assessment of administrative costs.	This aspect has been reinforced in section 4.1.2 of the evaluation and Annex IV. However, as mentioned in the report, there is a challenge in evaluating these practices, other than through qualitative assessment, as there is no system in place to track and measure the cost-effectiveness of the actions taken by those who receive funds from the

([139]) Article 28(1).

Recommendation	Follow-up
	program. Data on financial implementation is not connected to the performance indicators the Managing Authorities need to report on. As a result, it is difficult to analyse the financial investment against the results for each specific type of activity to determine which ones are giving the best value for money. Some more in-depth work should be possible during the retrospective evaluation, once information becomes more complete and work on unit costs can be developed.
It should analyse to what extent the perceptions of national authorities of complexity and cumbersome reporting are valid and assess any margin for improvement, simplification and burden reduction.	This has been reinforced in section 4.1.2, within the limits described in the previous section. As stakeholders pointed out, the administrative burden they currently perceive is a natural by-product of the learning process to adapt to new regulatory and reporting requirements, as well as new ways of working.
Given the current degree of implementation, the report should analyse the types of costs and provide underlying methodology.	See the previous two comments.
The coherence assessment should better explain the extent to which the programme is aligned with other EU funds (such as RFF and ESIF) and with the Pact on Migration and Asylum.	This element has been substantially reinforced in the revised version.
The report should better assess the additionality of BMVI to measures funded by Member States and analyse any data gaps which could hamper the analysis of additionality in the final evaluation.	The revision of the Staff Working Document has consolidated the conclusion that the BMVI provides an added value by supporting projects that go beyond the financial and operational capacities of individual Member States. The information available, progressively reinforced through time, will allow to deepen this analysis in the retrospective evaluation, by providing more quantitative information on the benefits of the instrument. The extent to which the EU funding reinforces the border management budget of Member States cannot be fully assessed in quantitative terms and it is subject to variations between Member States.

ANNEX II: METHODOLOGY AND ANALYTICAL MODELS USED

This chapter presents the methodology employed for the mid term evaluation of the BMVI 2021-2027 and the limitations encountered.

Methodology

The evaluation was supported by an external study that was divided into four phases: inception, interim, data collection and finalisation.

The inception phase was characterised by preparing the work to be done. This included preliminary desk research, scoping interviews, developing an intervention logic, and the refinement of the methodological approach to be used. The inception phase concluded with the production of an inception report which was discussed during a meeting of the Steering Group, revised by the contractors to incorporate the Commission's feedback, and later the final inception report was approved.

The interim phase focused on gathering data by completing the desk research, synthesising and analysing the annual performance reports submitted in 2023 and 2024, a review of the Member State mid term evaluations, reviewing a sample of target setting methodologies, and mapping the allocations by type of intervention and target group. This phase concluded with an interim report which was discussed with the Steering Group, revised and then accepted.

During the data collection phase, the focus was on collecting the remaining data necessary for the study. This included obtaining quantitative and qualitative data from SFC2021, reviewing EU and national documents, interviews with stakeholders, and conducting a targeted survey.

In the final phase, the findings were synthesised and triangulated, to formulate replies to the evaluation questions and draw conclusions. Furthermore, the second EU level focus group was held to validate the evaluation findings and develop lessons learned. The contractors delivered a draft final report which was discussed in a meeting with the Steering Group.

The draft staff working document was then shared with the Steering Group for a written consultation.

Regarding the data collection methods, the **desk research** included the review of the legislation, BMVI work programmes of the Thematic Facility, evaluation reports at the EU and national level, the annual performance reports submitted in 2023 and 2024, notes to the Home Affairs Funds Committee, studies and more.

Furthermore, data on financial allocations, financial progress and implementation progress was extracted from SFC2021. The data was reviewed by management mode, specific objective, Member State and field of intervention to develop the state of play.

Regarding the **consultation activities**, EU level interviews were conducted with the officials from DG HOME, DG NEAR, DG ENPL, Frontex, DG JUST, DG TAXUD, DG INTPA, the EEAS, IOM, UNHCR and ICMPD. The interviews included scoping interviews and semi-structured interviews to gather data for the analysis, including the

country case studies and thematic case studies. Further interviews were conducted for the case studies including with national authorities and beneficiaries.

Two EU level focus groups were held during the study. The first EU level **focus group** was held in person on the 25 June 2024. The focus group consisted of Managing Authorities and project beneficiaries. The focus group focused of presenting the intervention logic, mapping needs, and understanding the extent to which needs were met by the instrument.

The second focus group was held on 15 October 2024 and consisted of Commission officials, Managing Authorities, Frontex, ICMPD, and an NGO. The objective of the focus group was to validate the evaluation findings and further develop the lessons learned.

In addition to the focus groups, three **targeted surveys** were launched to target various stakeholders (national authorities, beneficiaries and other stakeholders). The analysis of the survey results fed into the main analysis.

The study included eight **country case studies** (HR, CZ, EL, IT, NO, PL, RO and ES) to dive deeper into the implementation of the BMVI to identify challenges encountered, specific processes, and best practices. The study also included five **thematic case studies** on Union Actions, EMAS, the impact of the Russian war of aggression towards Ukraine, Specific Actions, and the contribution to horizontal priorities. The thematic case studies allowed for deep-dives into certain aspects of the instrument and specific topics by reviewing specific projects.

Based on the work described above, the final report for the mid term evaluation was drafted and approved.

Output and result indicators defined in Annex VIII of the BMVI regulation

Specific objective set out in point (a) of Article 3(2) (SO.1)

Output indicators (O.1)

1. The number of items of equipment purchased for border crossing points:
   1.1. of which the number of automated border control systems/self-service systems/e-gates purchased.
2. The number of items of infrastructure maintained/repaired.
3. The number of hotspot areas supported.
4. The number of facilities for border crossing points constructed/upgraded.
5. The number of aerial vehicles purchased:
   5.1. of which the number of unmanned aerial vehicles purchased.
6. The number of maritime transport means purchased.
7. The number of land transport means purchased.
8. The number of participants supported:
   8.1. of which the number of participants in training activities.

9. The number of immigration liaison officers deployed to third countries.
10. The number of IT functionalities developed/maintained/upgraded.
11. The number of large-scale IT systems developed/maintained/upgraded:
    11.1. of which the number of large-scale IT systems developed.
12. The number of cooperation projects with third countries.
13. The number of persons who have applied for international protection at border crossing points.

Result indicators (R.1)

14. The number of items of equipment registered in the technical equipment pool of the European Border and Coast Guard Agency.
15. The number of items of equipment put at the disposal of the European Border and Coast Guard Agency.
16. The number of initiated/improved forms of cooperation of national authorities with the EUROSUR national coordination centres.
17. The number of border crossings through automated border control systems and e-gates.
18. The number of addressed recommendations from Schengen evaluations and from vulnerability assessments in the area of border management.
19. The number of participants who report three months after a training activity that they are using the skills and competences acquired during that training activity.
20. The number of persons refused entry by border authorities.

Specific objective set out in point (b) of Article 3(2) (SO 2)

Output indicators (O.2)

1. The number of projects supporting the digitalisation of visa processing.
2. The number of participants supported:
    2.1. of which the number of participants in training activities.
3. The number of staff deployed to consulates in third countries:
    3.1. of which the number of staff deployed for visa processing.
4. The number of IT functionalities developed/maintained/upgraded.
5. The number of large-scale IT systems developed/maintained/upgraded:
    5.1. of which the number of large-scale IT systems developed.
6. The number of items of infrastructure maintained/repaired.
7. The number of real estates rented/depreciated.

Result indicators (R.2)

8. The number of new/upgraded consulates outside the Schengen area:

8.1. of which the number of consulates upgraded to enhance client-friendliness for visa applicants.

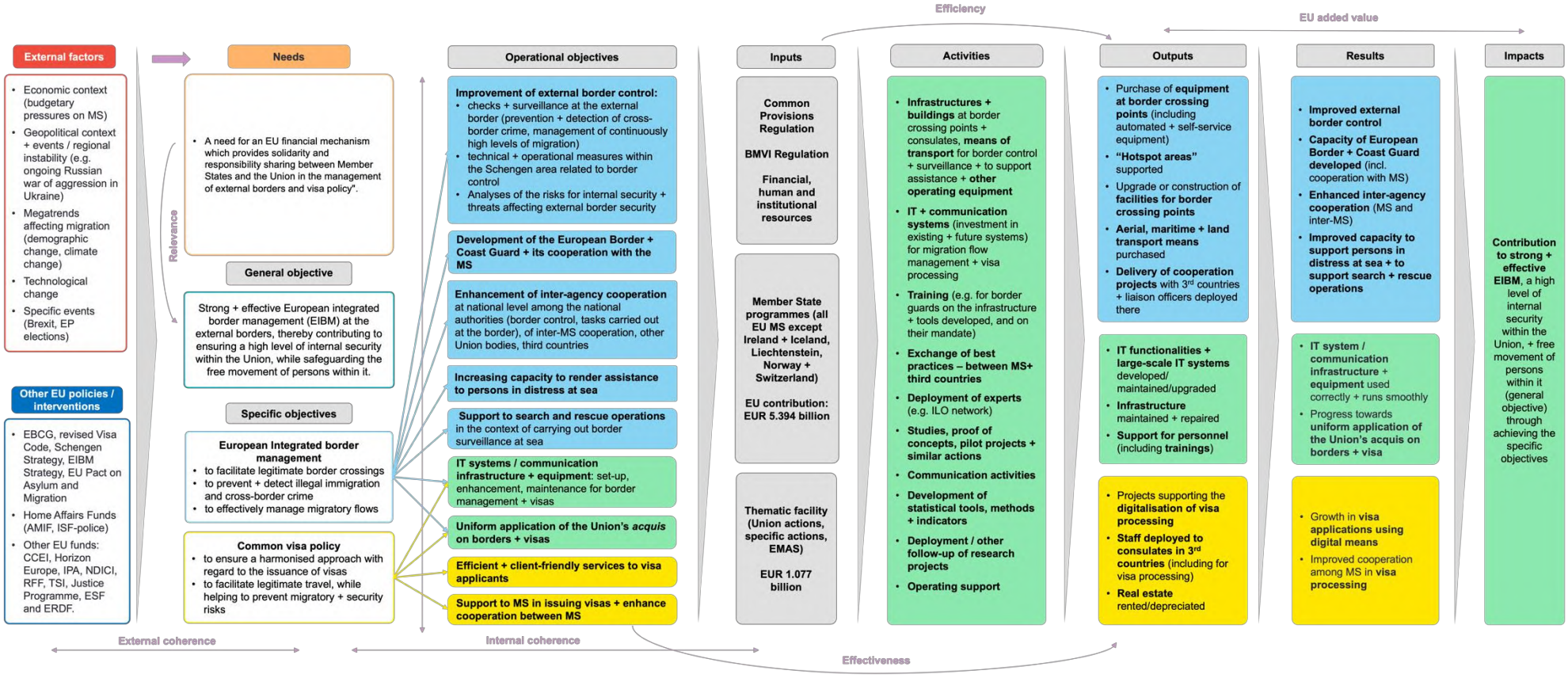
9. The number of addressed recommendations from Schengen evaluations in the area of the common visa policy.

10. The number of visa applications using digital means.

11. The number of initiated/improved forms of cooperation set up among Member States in visa processing.

12. The number of participants who report three months after a training activity that they are using the skills and competences acquired during that training activity.

BMVI 2021-2027 Intervention Logic



Limitations and mitigation measures

The study encountered several limitations that were mitigated to the greatest extent possible.

The first limitation was the inconsistent availability, quality and levels of granularity of data across the Member States. This made it difficult to conduct trend analysis and make comparisons across Member States. The study team mitigated this challenge by seeking further information when needed and employing protocols to ensure data reliability.

Secondly, some stakeholders had difficulty distinguishing between the 2014-2020 and 2021-2027 programming periods. The study made efforts to attribute the findings to the correct programming period.

Third, as the study was conducted at the same time as the AMIF and ISF evaluations, and participation in the targeted survey was voluntary, survey fatigue may have set in and caused a lower response rate.

Finally, the output and result indicators data transmitted by the Member States via SFC2021 included a number of omissions, clerical errors, and revealed differences in how Member States interpret, measure and report data. The data was reviewed for consistency and plausibility, and corrected where possible. Furthermore, not all Member States set milestones and targets. Of those that did, there were varying levels of ability to set realistic milestones and targets.

ANNEX III: EVALUATION MATRIX

Relevance

Evaluation Question	Judgment criteria	Indicators	Sources
EQ12. To what extent does the fund address the evolving needs?	The objectives and type of activities of the BMVI programme addressed the needs of stakeholders in the area of: • Integrated border management • Common visa policy at the time of the implementation	• Documentary evidence that the funds objectives rely on diagnosis /studies/assessment of border management and visa policy needs in the EU and make direct reference to them (needs are identified) • Evidence (from documents or reported by stakeholders) of consultation with relevant stakeholders /target group • Stakeholders' feedback on the extent to which they consider that the objectives and activities of the Fund addressed the needs of the EU, Member States, and citizens • Evidence (from documents or reported by stakeholders) that the flexibility offered by the Fund (i.e., transfers of money between different objectives) helped to address changing needs and emerging challenges (e.g. COVID-19 or country specific crisis) • Mapping of sum allocated to Member States (assessment of whether priority/key Member States received the most funding).	• Desk research including BMVI impact assessment and ISF-BV evaluation. • Mapping of the scope of investments and target groups addressed • Insights from Focus Group 1 (dealing with analysis of needs) • Surveys of relevant national authorities within Member States • Survey of other relevant national authorities, competence centres, experts at EU and national level • Survey of beneficiaries under National Programmes • Public Consultations • Interviews with EU stakeholders • Country case studies • Thematic case studies (in particular case studies 1 -4)

Evaluation Question	Judgment criteria	Indicators	Sources
	The objectives and type of activities of the BMVI programme continued to address the needs of relevant stakeholders during the implementation of the programme (2021-December 2023)	• Stakeholders' opinion on the extent to which the objectives and activities of the BMVI addressed their needs • Identification of any unmet stakeholders' needs • Examples where the BMVI programme showed flexibility/was able to adapt to unexpected changes/ external factors (e.g. COVID-19, the Russian war of aggression in Ukraine or country specific crisis) • Stakeholders' opinion on the flexibility of the BMVI and the relevance of the thematic facility to respond to emerging challenges and needs	• Country case studies • Mapping of the scope of investments and target groups addressed • Insights from Focus Group 1 (dealing with analysis of needs) • Surveys of relevant national authorities within Member States • Survey of other relevant national authorities, competence centres, experts at EU and national level • Survey of beneficiaries under National Programmes • Interviews with EU stakeholders • Thematic case studies (in particular case studies 1 -4)
EQ 13. To what extent can the fund adapt to the evolving needs?	The BMVI programme is flexible enough to remain relevant as and when circumstances change and challenges emerge The thematic facility focuses on the key priority needs and key target groups.	• Evidence (from documents or reported by stakeholders) of the Thematic Facility ability to respond to emerging or unforeseen needs, changing EU priorities or evolving challenges • Evidence (from documents or reported by stakeholders) of rules and procedures in place that ensure that the substantial adjustments of the fund can be implemented in due time if new needs arise. • Evidence (from documents or reported by stakeholders) that continuous needs assessment are performed on a regular basis or whenever there are relevant contextual changes at the national level (considering the National Programmes implementation) and transnational level (for Union Actions) • Evidence (from documents or reported by	• Desk research risk analysis reports, vulnerability assessment and foresight studies where available (analysis of future trends) • Mapping of the scope of investments and target groups addressed • Insights from Focus Group 1 (dealing with analysis of needs) • Surveys of relevant national authorities within Member States • Survey of other relevant national authorities, competence centres, experts at EU and national level • Survey of beneficiaries under National Programmes • Public Consultations • Interviews with EU stakeholders • Country case studies • Thematic case studies (in particular case studies 1 -4)

Evaluation Question	Judgment criteria	Indicators	Sources
		stakeholders) of mechanisms and/or consultative process, such as the partnership / monitoring committee, to engage with stakeholders and ensure the continued relevance of Fund to address changing needs by providing timely input on evolving needs and relevant developments on the ground (e.g., changes in migratory pressures, threats of cross-border crime, and the need to maintain a balance between security concerns and facilitating legitimate travel). • Stakeholders' opinion on the flexibility of the BMVI and the relevance of the thematic facility to respond to emerging challenges and needs • Sums allocated to the thematic facility to respond to emerging needs (as a % of the total BMVI fund)	

Effectiveness

Evaluation Question	Judgment criteria	Indicators	Sources
EQ1. To what extent is the fund on track to achieving its objectives?	The expected outputs and significant progress to achieve their targets: • (SO1) European Integrated border management, to facilitate legitimate border crossings, to prevent + detect illegal immigration and cross-border crime + to effectively	Assessing progress to achieve outputs against expected outputs and objectives in the implementation of the Integrated border management (SO1) and the common visa policy (SO2) across MS: • Increase of developed/ maintained/upgraded IT equipment/equipment; • Increase cooperation and staff with 3rd countries.	Documentary review: • Programme documents (National Programmes, national evaluation plan, Annual Performance Reports (APR) submitted in 2023 and 2024, financial data from SFC2021 and COMPASS, etc.) • Interviews with DG HOME stakeholders

Evaluation Question	Judgment criteria	Indicators	Sources
	manage migratory flows • (SO2) Common visa policy to ensure a harmonised approach with regard to the issuance of visas + to facilitate legitimate travel, while helping to prevent migratory + security risks		and other EU stakeholders including staff managing Fund • Country case studies • Surveys • Focus groups

Evaluation Question	Judgment criteria	Indicators	Sources
EQ2. To what extent is the monitoring and evaluation framework suitable to inform on the progress towards the achievement of the objectives of the instrument?	• The monitoring and evaluation framework ensures the reliability of data provided by Member States through a robust electronic data exchange system, fostering accurate reporting and informed decision-making.	• Number of Managing Authorities, Intermediate Bodies, and beneficiaries with documented internal procedures to ensure the accuracy and reliability of reported data. • Level of understanding based on stakeholders' judgement of monitoring requirements among stakeholders involved in data supply process.	Documentary review: • Programme documents (National Programmes, national evaluation plan, Internal regulation of the monitoring committee, Annual Performance Reports (APR) submitted in 2023 and 2024) • Interviews with relevant stakeholders (Managing Authorities, Intermediate Bodies and beneficiaries) • Country case studies • Surveys • Focus groups
	• The utilization of common and fund-specific indicators enables the comprehensive capture of the Fund's achievements and facilitates robust ex-post evaluation.	• Number of common indicators included in monitoring and evaluation framework that align with Fund's intervention logic. • Evidence of data collected that supports estimation of impacts attributable to the Fund with a clear causal link. • Evidence from stakeholders on the comprehensiveness of monitoring system in capturing project performance and	Documentary review: • Programme documents (National Programmes, national evaluation plan, Internal regulation of the monitoring committee, Annual Performance Reports (APR) submitted in 2023 and 2024) • Interviews with relevant stakeholders

Evaluation Question	Judgment criteria	Indicators	Sources
		outcomes.	(Managing Authorities, Intermediate Bodies and beneficiaries) • Country case studies • Surveys • Focus groups
EQ3. How was the involvement of the relevant partners ensured across all stages of the programming, implementation, monitoring and evaluation?	• The active engagement of relevant partners in the monitoring committee (non-exhaustive), reflecting their consistent participation across various stages of the fund cycle, is assessed.	• Evidence of relevant partners identified and involved in the monitoring committee (non-exhaustive), in accordance with their defined roles as per the relevant rules of procedure. • Evidence of the effectiveness of communication channels utilized to engage relevant partners across all stages of the fund cycle is assessed.	Documentary review: • Programme documents (National Programmes, national evaluation plan, Internal regulation of the monitoring committee, Annual Performance Reports (APR) submitted in 2023 and 2024) • Interviews with relevant stakeholders (Managing Authorities, Intermediate Bodies and beneficiaries) • Country case studies • Surveys • Focus groups
EQ4. To what extent does the fund respect or promote in its implementation the horizontal principles?	• The instrument actively promotes and adheres to horizontal principles, including the charter of fundamental rights of the EU, gender equality, prevention of discrimination, and sustainable development, across all stages of implementation, is assessed.	• Evidence of organizational and procedural arrangements are in place to ensure compliance with the charter of fundamental rights of the EU in all aspects of fund implementation. • Evidence of organizational and procedural arrangements in promoting gender equality and mainstreaming across all stages of fund preparation, implementation, monitoring, reporting, and evaluation. • Evidence of organizational and procedural arrangements to prevent discrimination on all grounds throughout the programming cycle. • Evidence of organizational and procedural arrangements	Documentary review: • Programme documents (National Programmes, national evaluation plan, Internal regulation of the monitoring committee, framework to report a breach and/or violation of the charter, Annual Performance Reports (APR) submitted in 2023 and 2024) • Interviews with relevant stakeholders (Managing Authorities, Intermediate Bodies and beneficiaries) • Country case studies

Evaluation Question	Judgment criteria	Indicators	Sources
		ensure alignment with the objective of promoting sustainable development, including consideration of the UN Sustainable Development Goals, the Paris Agreement, and the "do no significant harm" principle	• Surveys • Focus groups
EQ5. To what extent is the fund effective in communicating and disseminating on its opportunities as well as achievements?	• The instrument effectively communicates and disseminates information on its opportunities and achievements.	• Number and types of channels employed to disseminate information about the instrument's opportunities and achievements at all levels (UE, MS and beneficiaries) • Stakeholders' judgment on whether they feel informed about the opportunities and achievements of the fund • Evidence of the fund's communication efforts reach the intended target audience and engage them effectively with information on fund opportunities and achievements. • Evidence of clarity and accessibility of information provided by the fund regarding its opportunities and achievements, as perceived by stakeholders. • Evidence of utilization and effectiveness of various communication channels employed by the fund to disseminate information.	Documentary review: • Programme documents (National Programmes, national evaluation plan, Internal regulation of the monitoring committee, Annual Performance Reports (APR) submitted in 2023 and 2024) • Interviews with relevant stakeholders (Managing Authorities, Intermediate Bodies and beneficiaries) • Country case studies • Surveys • Focus groups

Efficiency

Evaluation question	Judgment criteria	Indicators	Sources
EQ6. To what extent does the fund support cost-effective measures?	• The fund supports types of interventions and types of actions that are known to be cost-effective, based on available evidence, including relevant literature or the ex-post evaluation of the previous fund • The early evidence coming from the operations indicates that the cost per unit is in line or below existing benchmarks and estimates • The differences in the cost per unit among similar operations within the same fund can be explained and justified (e.g., by differences in the intensity or quality of the support offered, innovativeness, etc.)	• Financial allocation per MS and per types of actions • Absorption rate per MS and overall • Result and Output indicators as per Core performance Indicators (2021-2027). • Stakeholder perception on the level of cost-effectiveness of Union Actions • Stakeholder perception of the Level of cost-effectiveness of Emergency Assistance	• Annual Implementation Reports, Work programmes, annual reports • Survey for responsible authorities and beneficiaries • Country case studies • Interviews • Thematic case studies • Previous Evaluations • SFC2021 • National evaluation reports
EQ7. To what extent is the management and control system efficient?	• Overall resources (human and financial) are allocated to technical assistance per member states	• Share of MS that report mechanisms in place at MS level to detect and prevent fraud and irregularities • Number of follow up cases of fraud and other irregularities (where possible, analysed by country) • The extent to which the consulted stakeholders consider the technical assistance is used to strengthen the management and control system • Share of Stakeholders have issues in reporting and introducing data in the electronic data exchange	• Annual Implementation reports • Country case studies • Online survey • **Thematic case studies**

Evaluation question	Judgment criteria	Indicators	Sources
		systems • MS that report there are mechanisms in place that evaluate the level of cost-effectiveness to select the beneficiaries (for direct and indirect management, emergency or innovative actions) • The extent to which the NPs, the EMAS and UA produced spill-over effects	

Evaluation question	Judgment criteria	Indicators	Sources
EQ8. To what extent is further simplification achievable? How?	• Simplified cost options used create simplification on the ground • There is room for additional use of simplified cost options and financing not linked to costs options	• Share of MS that used simplification measures (e.g., simplified cost options) into the National Programmes • The extent to which consulted stakeholders consider the simplification measures used in the implementation of National Programmes were effective • The extent to which the consulted stakeholders consider there is room for additional use of simplified cost options and financing not linked to costs options • Perception of stakeholders regarding the adequacy of the administrative burdens • The extent to which the consulted stakeholders consider there is room for additional use of simplified cost options and financing not linked to costs options	• Annual Implementation reports • Country Case studies • Online survey

Coherence

Evaluation Question	Judgment criteria	Indicators	Sources
EQ9. To what extent is the fund coherent with initiatives supported under its policy domain, in particular with support under the thematic facility across the different management modes? (we interpreted this question as being about the internal coherence of the funds)	• The structures of the Fund with the Thematic Facility component, ensured greater complementarities and, where relevant, synergies across the different management modes • There are coordination mechanisms in place to ensure coordination, complementarities and, • where relevant, synergies across the different management modes	• Documentary evidence and/or stakeholders' opinion on synergies and/or duplication across the different management /implementation modes of the Fund (i.e. the National Programmes under shared management and the thematic facility under a combination of shared and in-/direct management). • Documentary evidence and/or stakeholders' opinion on the existence and use of coordination mechanisms or process within the Fund to ensure complementarity between the different management modes • Stakeholders' justification for (potential) overlap (e.g. same target group but different type of measure/ different need addressed/ different readiness of the type of funding support chosen) • Stakeholders' perception on the internal coherence of the management mode and the use of the thematic facility	• EU level desk research: review of programme documents (e.g., multi-annual workplans) and internal coordination mechanisms • Interviews with DG HOME BMVI stakeholders (internal coherence) • Thematic case studies on the different management mode
EQ10. To what extent is the fund coherent with other EU funds (including other Home Affairs funds), and in particular with EU's external action?	• BMVI is (externally) coherent (identification of synergies or duplications/overlaps) with: • EU policy and priorities in the fields of visa policy and border management (e.g. on migration, EIBM and visa) as well as	• Documentary evidence of alignment between BMVI objectives and EU policies, strategies, and legal framework (including CPR) • Documentary evidence and/or stakeholders' opinion on synergies or duplications /overlaps between BMVI	• EU level desk research, including review of programme documents (e.g., multi-annual workplans) EU policy and strategy documents (e.g., CCEI documentation, documents on approach to Home Affairs Funds, New Pact on Migration and Asylum; EIBM strategy, etc.,) and Member States implementation reports (e.g., identification of challenges related to the coherence)

Evaluation Question	Judgment criteria	Indicators	Sources
	external actions • other EU actions /activities in the area of migration and border management including other Home Affairs funds (e.g., AMF and ISF Police) as well as Frontex (e.g., evidence of inter-agency/institution cooperation). • Other broader EU action as relevant including DG TAXUD (Customs Control Equipment Instrument), DG JUST (Justice Programme), DG RTD (Horizon 2020 and Horizon Europe), DG INTPA (NDCI Global Europe), DG NEAR (IPA), Cohesion Policy funds (ESF and ERDF) or EEAS (The Neighbourhood, Development and International Cooperation Instrument).	and other thematically relevant EU interventions (see Judgement Criteria). • Stakeholders' perception on the external coherence of the Fund with other EU and national funds. • Documentary evidence of coordination mechanisms and bodies (e.g., fund committees) to ensure coherence between the BMVI Fund and other national or European funds (notably those identified as having high potential for complementarity or synergies) • Stakeholders' perception on the extent to which the mechanisms and bodies in place are adequate to generate synergies and avoid duplication of effort. • Documentary evidence and/or stakeholders' perception on the existence of inter-agency cooperation (e.g., with Frontex as well as cooperation at national level among the competent authorities within each Member State)	• Interviews with DG HOME and other EU stakeholders including Commission staff managing other funds, the Committee for the Home Affairs Funds, and EU Agencies in the field of Justice and Home Affairs (external coherence) • Case studies (country and thematic), including consultation at the MS level, and desk research (reviews of evaluation at the national and EU level) • Survey with national authorities (coherence and complementarity with other EU and national funds)

EU Added Value

Evaluation Question	Judgment criteria	Indicators	Sources
EQ11. Was any value added brought about by the EU Support?	• The Fund enabled to implement interventions and address target groups that would have not been covered by Member States acting on their own. • There is evidence of scope effects, i.e. of additional target groups addressed or additional types of interventions offered	• Number of actions addressing a wider target groups / policy areas which were not considered in the programming phase • Number and volume of actions per target group • Volume of services offered • Number and type of end-users addressed • Level of alignment between priorities with a high Union added values and actions and interventions supported by the thematic facilities • Number and type of national resources allocated for the implementation of initiatives similar to those supported by the Fund	Documentary review: • Annual Implementation Reports • National Evaluations • EASO reports • National policies on visa, border management, illegal immigration • Country case study interviews • Thematic case study interviews • Survey for end-beneficiaries • Interviews at MS level

ANNEX IV: OVERVIEW OF BENEFITS AND COSTS

In relation to the administrative procedures required, various type of costs have been identified. Consultation activities revealed that direct compliance costs include adjustment costs, which are one-time expenses incurred as stakeholders adapt to the changes introduced by the Common Provisions Regulation (CPR). Additionally, recurrent administrative costs have emerged due to increased information requirements necessary for compliance with monitoring and reporting obligations under the CPR. Furthermore, as evidenced in countries such as Finland and Italy, costs associated with managing grants, procurement, and other administrative procedures have increased, primarily due to legal challenges in tendering processes and the need for procedural simplification[140]. The review of Annual implementation reports confirms that direct labour costs and the time devoted to completing activities have been impacted by the administrative burden and the need for additional training and capacity building, as indicated by France and Greece.

Despite these challenges, desk research and stakeholder consultations suggest that the costs are outweighed by a range of direct and indirect benefits for authorities, beneficiaries, and target groups. It is anticipated that the administrative burden resulting from increased monitoring and reporting will decrease over time, as both administrations and beneficiaries become familiar with the new requirements. The reduction of administrative burden is further supported by the standardisation promoted by the CPR across the European Structural and Investment Funds. This was confirmed during consultation activities, with consulted stakeholders that mentioned the administrative burden they currently experience is a natural consequence of the learning process required to adjust to new regulatory and reporting requirements, as well as new operational methods.

Indirect benefits are also anticipated on medium and long term, including improved integration and a more uniform, standardized approach resulting from the implementation of the ESI Funds and the Home Affairs Funds under the CPR. This will support the harmonized application of Union acquis and strengthen effective European integrated border management at the Union's external borders. Additionally, enhanced and more effective cross-country cooperation in border management and visa issuance is expected.

The effort to implement and adapt to the usage of new electronic data exchange systems imply enforcement costs, encompassing expenses such as those related to the provision of guidance materials and training for beneficiaries on the use of new electronic data exchange systems. The analysis of Member States' Programs highlights that Member States ([141]) have implemented or are in the process of developing new IT systems, planning budgets for capacity building and IT system development. Furthermore, national authorities and beneficiaries face an additional administrative burden arising from the methodological complexities of implementing simplified cost options. However, there are no mechanisms in place for systematically reporting costs related to the administrative burden, limiting the ability to quantify these costs.

([140]) Annual Implementation reports
([141]) Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Malta, Poland, Romania, Slovenia, Spain

Despite these costs, the direct and indirect benefits significantly outweigh the expenses incurred. The implementation of electronic data exchange systems for monitoring is expected to alleviate the administrative burden, thereby facilitating improved oversight of the Fund's implementation. This is already confirmed by the fact that the preliminary gains include improved data sharing and communication among involved parties, reduced reliance on paper-based processes, and the potential for enhanced transparency and accountability in programme management. Countries like Belgium and Finland have explicitly stated in their Member States Programmes that they anticipate the costs associated with new IT systems will enhance overall cost-effectiveness in the long term. [142] From the beneficiaries' perspective, it is expected that, over time, the benefits of utilising the new electronic data exchange systems and standardized reporting will outweigh the current training costs.

Moreover, the initiatives supported by the Fund will facilitate legitimate border crossings, enhance the detection of illegal immigration and cross-border crime, and improve the effective management of migratory flows. The Fund will also promote a harmonized approach to visa issuance, facilitate legitimate travel, and assist in mitigating migratory and security risks. However, the lack of mechanisms for systematically reporting costs at the Member State level limits the possibility to quantify these administrative expenses. Additionally, given the current state of the Fund's implementation, the benefits may not yet be fully measurable, as project implementation has only recently begun.

Cost or benefit		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment
BMVI total funding out of which:	One-off	EUR 7,152 million, out of which:			
BMVI Shared management funding	One-off	EUR 5,414 million (the EU contribution amounts to EUR 4,225 million)			

([142]) Member States Programmes

Cost or benefit		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment
BMVI Direct management funding	One-off	EUR 124 million for EMAS EUR 10,3 million for Union Actions			
BMVI Indirect management funding	One-off	EUR 1,47 million			
Direct compliance costs: Adjustment costs	One-off	Time spent to adapt to the transition under the CPR, as the objectives, scope, and structure of the Fund and Member States Programmes			
Administrative costs	Recurrent	Increased information requirements to comply with monitoring and reporting under CPR, causing additional administrative burden		Administrative costs for the Fund's direct beneficiaries for adapting to the usage of new electronic data exchange systems	

Cost or benefit		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment
		Increased information requirements and effort related to the methodological complexity of implementing simplified cost options Increased effort to implement and adapt to the usage of new electronic data exchange systems.			
Regulator charges					
Enforcement costs, meaning costs associated with activities linked to the implementation of an	Reccurent	Costs related to providing guidance materials and trainings for beneficiaries to use the new electronic data exchange systems			

Cost or benefit		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment
initiative such as: Monitoring					
Inspections					
Adjudication/ litigation					
Indirect costs					
Direct benefits		It is expected that the administrative burden caused by increased monitoring and reporting will reduce in time, as the administrations and beneficiaries will get used to the new requirements. This is also due to the standardization that the CPR is fostering across ESI Funds		It is expected that in time, the benefits of using the new electronic data exchance systems and standardized reporting will outweigh the current training costs The actions supported through the Fund will facilitate legitimate border crossing, the detecting of illegal immigration and cross-border crime, as well	Given the state of implementation of the Fund, such benefits may yet be fully quantified as the implementation of the projects has only recently started

Cost or benefit		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment
		The development of electronic data exchange systems for monitoring will reduce the administrative burden in the future and will allow better monitoring of the Fund's implementation In time, the benefits of implementing simplified cost options will outweigh the costs, as beneficiaries already sense a slight relief of the administrative burden in terms of project reporting		as the effective management of migratory flows The Fund will also support the harmonized approach to the issuance of visas, facilitate legitimate travel, while helping to prevent migratory and security risks	

Cost or benefit		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment
Indirect benefits		A better integration and more uniform and standardized approach due to the implementation of the ESI Funds and the Home Affairs Funds under the CPR Support for the harmonized implementation of the Union acquis and stronger and more effective European integrated border management at the Union's external borders		Increased and more effective cross-country cooperation in the field of border management and visa	

ANNEX V: STAKEHOLDER CONSULTATION – SYNOPSIS REPORT

Call for evidence

Prior to the start of the evaluation, in line with the Better Regulation Provisions, a call for evidence was launched in the Have Your Say platform. Three contributions were received ([143]):

- The European Council for Refugees and Exiles (ECRE) provided a series of points regarding
    - The lack of implementation of the partnership principle in EU funds.
    - The lack of transparency on the implementation of the horizontal enabling conditions related to the Charter of fundamental rights.
    - A positive assessment of the EU's response to Ukraine, particularly regarding provision of EU funding to civil society.
    - The importance to allocate EU funds to objectively identified needs and implement all parts of the CEAS.
    - The fact that the use of internal policy funds in third countries undermines coherence of internal and external policy objectives.
- Red ACOGE, from Spain, stated that the set up and implementation of the Monitoring Committee for the Spanish programme was not in line with the requirements and the regulation, notably in terms of transparency (lack of rules of procedure and minutes) and the inadequate representation of NGOs and Civil Society Organisations.
- An anonymous contributor, from Greece, drew the Commission's attention to the lack of solidarity between Member States when it comes to assisting those states more under pressure at the borders. It also highlighted the need to control borders, including internal borders, in such a way as not to restrict freedom of movement but also to ensure the security of citizens.

Consultation strategy

Consultations included an online survey, EU level interviews, a focus group, case studies (country and thematic), and a validation workshop. The objective of the consultations was to collect relevant information and insights on the effectiveness, efficiency, coherence, EU added value and relevance of the BMVI as well as to collect inputs on lessons learned. To do so, a wide range of EU, international and national level stakeholders were consulted.

Even if the open public consultation carried out between September and November 2024 concerned firstly the ex-post evaluation of ISF-BV, given the continuity in objectives and interventions, elements related to the Instrument for financial support for Border

([143]) https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13851-Border-Management-and-Visa-Instrument-BMVI-for-2021-2027-mid-term-evaluation/feedback_en?p_id=32300637

Management and Visa Policy (BMVI) (2021-2027) may have also be taken into account for the mid-term evaluation.

Table 1: Overview of the stakeholders reached through each consultation tool / method

	EU level Interviews	Online surveys	Focus Group	Validation workshop	Public consultation	Country / thematic case studies
European Commission staff	x			x		x
Migration and Home Affairs (and other relevant) Agencies	x					x
National Authorities		x	x	x		x
Participant / (end) beneficiaries		x				x
Other SHs (EU bodies, IOs, NGOs, etc.)	x				x	x
Expert groups, network, research centres and academics		x	x		x	
Wider public (including Non-EU)					x	

Online survey

An online survey was launched to (i) collect information on the effectiveness, efficiency, coherence, EU added value and relevance of the BMVI, (ii) understand the problems/gaps affecting the functioning and effects of the BMVI, as well as (iii) gather suggestions for future-looking recommendations. Three different survey questionnaires were used, targeted respectively at **National Authorities (38 total respondents), other stakeholders involved (55 total respondents) and beneficiaries (40 respondents)**. The survey ran from June 17, 2024, to September 16, 2024, and it has been administered and centrally managed by the evaluation team by using the Qualtrics tool.

EU level interviews

Between July and November 2024, the Study team carried out **21 in-depth EU level interviews** aimed to gather relevant information and insights on the effectiveness,

efficiency, coherence, EU added value, and relevance of the BMVI. The response rate amounted 60% as 21 out 35 individuals contacted agreed to participate in an interview. Among the 14 negative responses, the vast majority involved individuals redirecting the Study team to a more appropriate contact. Specifically, 2 requests went unanswered, 11 individuals referred the Study team to another interviewee, and 1 individual declined. Stakeholders reached through the EU level interviews were:

Table 2: EU-Level interviews conducted

European Commission staff	
DG HOME's relevant Directorates	
1	Directorate A: International & Horizontal Affairs / Policy Coordination & Interinstitutional Relations (A1)
2	Directorate B: Schengen, Borders & Visas / Schengen & External Borders (B1)
3	Directorate B: Schengen, Borders & Visas / Schengen Governance (B2)
4	Directorate B: Schengen, Borders & Visas / Visa Policy (B4)
5	Directorate E: HOME Affairs Funds / Funds Coordination (E1)
6	Directorate E: HOME Affairs Funds / Union Actions and Procurement (E4)
7	Directorate E: HOME Affairs Funds / Budget & Reporting (E5)
8	Directorate F: Innovation & Audit / Audit & Compliance (F1)
9	Directorate F: Innovation & Audit / Innovation & Security Research (F2)
Others relevant DGs	
10	DG TAXUD / Directorate A: Customs / Customs Policy (A1)
11	DG NEAR / Migration (DGA2.01)
12	DG NEAR / Rule of Law - Western Balkans Policy & Regional Strategy (D1)
13	DG JUST / Coordinator of the Justice programme
14	DG INTPA / Person in charge of NDICI-Global Europe Instrument
15	DG EMPL / ESF+ Coordination Unit in charge of migration theme
Migration and Home Affairs (and other relevant) Agencies	
16	European Border and Coast Guard Agency (Frontex)
EU Body	
17	European External Action Service (EEAS)
International Organisations	

18	International Centre for Migration Policy Development (ICMPD) / Migration Partnership Facility (MPF)
19	UNHCR Brussels
20	UNHCR Liaison Office to Frontex
21	IOM Greece

Focus group

A focus group was held in person on June 25, 2024, in Brussels, as part of the Home Affairs Funds Conference. Moderated by the Study Team, this focus group aimed to gather direct input from ISF-BV and BMVI Managing Authorities, audit authorities, and beneficiaries, regarding the current and emerging needs in the area of border management and visa policy in their Member State. The discussions focused on mapping current and future needs, evaluating how well these needs have been met, and identifying any gaps in the existing instruments. Twenty-one participants attended the focus group meeting, covering:

- managing authorities and beneficiaries from the following countries: AT, BE, DK, FI, FR, HU, HR, IS, LU, NL, SE, as well as CH, NO and LI.
- two EU agencies: Frontex and EUDA ([144])
- One NGO: ECRE.

Validation workshop

A validation workshop was held on October 15, 2024, with 13 representatives from a sample of national authorities (BG and EE), relevant EC stakeholders (DG HOME units E4 and B1) and EU agencies (Frontex), as well as from network expert groups (Profundo), NGOs and International Organisations (ICMPD), to present the evaluation findings and related conclusions, and to discuss the feasibility of the preliminary recommendations under assessment. The workshop consisted of a plenary session, where the evaluation team presented the objectives of the study and the key evaluation findings, followed by a Q&A section with participants.

Country and thematic case studies

Eight country case studies were conducted in Croatia, the Czech Republic, Norway, Poland, Spain, Greece, Italy, and Romania. These countries were selected to provide meaningful and representative coverage of BMVI interventions across participating countries. Through these country case studies, a total of 74 stakeholders were consulted, including EU stakeholders, managing authorities, intermediate bodies, monitoring committees and beneficiaries.

([144]) Formerly EMCDDA

Table 3: Number and type of stakeholders interviewed per country case study

Stakeholders	Croatia	Czech Republic	Greece	Italy	Norway	Poland	Romania	Spain	**Total (per stakeholder)**
Commission		1	1					1	**3**
Managing Authority	1	4	1	1	2	2	1	1	**13**
Intermediate bodies			1			2	1		**4**
Monitoring Committees		2	1		2				**5**
Beneficiaries	5	2	10	4	6	5	3	14	**49**
Total	**6**	**9**	**14**	**5**	**10**	**9**	**5**	**16**	**74**

Additionally, five thematic case studies were conducted on Emergency Assistance, Specific Actions, Union Actions, the Russian war of aggression against Ukraine and Horizontal priorities. 34 stakeholders were interviewed as part of the first four case studies (the Horizontal priorities case study relied on the survey findings and desk research).

Table 4: Number and type of stakeholders consulted per thematic case study

Stakeholders	Emergency Assistance	Specific Actions	Union Actions	Russian war of aggression	**Total (per stakeholder)**
Commission	2		2		**4**
Managing Authority	3		1	5	**9**
Monitoring Committees	1				**1**
Beneficiaries	4 ([145])	5	9	2	**20**
Total	**10**	**5**	**12**	**7**	**34**

([145]) Several of the project coordinators/beneficiaries were responsible for multiple projects.

Results of the consultation activities

Online Surveys

Relevance

The BMVI instrument is widely recognised for its **relevance** and **adaptability** by national authorities, stakeholders, and beneficiaries. Most national authorities (15 out of 17) conducted needs assessments before drafting their national programs, and 11 did so during implementation. Specific objectives were highly rated, with SO1 (external borders) considered relevant to a large or very large extent by 61% of national authorities and 60% of stakeholders, while SO2 (visa policy) was deemed even more relevant, with 82% of national authorities, 61% of stakeholders, and 47% of beneficiaries rating it highly. IT and communication systems emerged as the most critical funded activity, followed by infrastructure and equipment, whereas awareness-raising, innovative methods, and statistical tools were rated as less relevant. Despite its relevance, 29% of national authorities identified unmet needs, including financial gaps for IT systems and infrastructure, operational support for staffing and vehicles, and expanded training. Flexibility was another strong point of BMVI, with 41% of national authorities, over two-thirds of stakeholders, and 38% of beneficiaries finding it adaptable to challenges such as COVID-19 and the Ukraine crisis, although 13% of beneficiaries considered it limited in flexibility.

Effectiveness

The BMVI instrument is widely regarded as effective by national authorities, stakeholders, and beneficiaries, though some areas for improvement remain. Audit Authorities (80%) and Intermediate Bodies (75%) rated progress as "completely" or "almost completely on track," while Managing Authorities had mixed views. Monitoring and evaluation were deemed effective by 29% of national authorities and 53% of stakeholders, though concerns were raised, particularly by Managing Authorities (24%) and 17% of stakeholders who expressed dissatisfaction. Partner involvement was rated positively by 71% of national authorities and 67% of stakeholders, though gaps in inclusion were noted in some Member States. Horizontal principles like digital transition and green budgeting were respected to a very large extent by 35% of national authorities and 74% of stakeholders, though some reported limited adherence. Communication and dissemination efforts were seen as effective by 65% of national authorities, 57% of stakeholders, and 57% of beneficiaries, though dissatisfaction and uncertainty were noted by a minority. Among beneficiaries, 68% felt BMVI significantly or largely helped achieve project objectives, while 54% found the monitoring framework effective and felt adequately involved in programming, implementation, and evaluation. However, mixed engagement levels and gaps in partner inclusion suggest areas for improvement in ensuring consistent effectiveness and participation across countries.

Efficiency

The efficiency of the BMVI instrument shows a mixed picture across key areas. Regarding EU budget allocation, 39% of national authorities found it sufficient, while 30% deemed it insufficient due to challenges like rising IT costs, border management pressures, and delays in EU-level implementation. Progress toward targets was rated positively, with 64% of respondents, including 53% of public authorities and 48% of beneficiaries, indicating alignment to a large or very large extent. Cost efficiency was

broadly acknowledged, with 73% of national authorities and 71% of beneficiaries finding operations cost-effective. However, burdens such as time-consuming information obligations, procurement procedures, and regulatory requirements were significant, with 64% of national authorities and 20%-34% of beneficiaries reporting them from moderately to highly burdensome. Simplification measures, such as simplified cost options, were moderately effective, but 71% of beneficiaries noted the need for further improvements in reducing administrative burdens. Technical assistance positively impacted management and control systems for 52% of national authorities and 67% of other stakeholders, though uptake was limited, with only 20% of beneficiaries receiving assistance. The electronic data exchange system also faced usability challenges, with 57% of beneficiaries expressing uncertainty about its functionality and user-friendliness.

Coherence

The internal coherence of the BMVI instrument was positively assessed by 95% of national authorities, who confirmed that its structure supports complementarities and synergies, though 20 respondents did not provide feedback. While 35% of national authorities conducted assessments to identify complementary funding instruments, over half were unsure or did not answer. Coherence with other Home Affairs funds was rated highly, with 45% of respondents noting strong alignment with the Asylum, Migration and Integration Fund (AMIF) and 42% with the Internal Security Fund (ISF). Coherence with Horizon Europe and the European Structural and Investment Funds (ESIF) was also confirmed. Coordination mechanisms, such as strategic planning and joint monitoring committees, were reported by 45% of respondents, while 55% cited monitoring mechanisms to prevent overlap of financial instruments. Among other stakeholders, 95% agreed that BMVI's management and funding modalities promote complementarity and synergies. External coherence was rated well with ISF (68%) and AMIF (50%), though uncertainty about coherence with other EU instruments was noted. Beneficiaries perceived strong coherence with ISF (37%) and AMIF (28%), but significant non-responses limited the comprehensiveness of the findings.

EU Added Value

The EU added value of the BMVI instrument was positively assessed, particularly by managing authorities, who noted improvements in the Smart Borders initiative and enhanced stakeholder cooperation, though some reported no additional effects at this stage. For the Thematic Facility, 43% of managing authorities believed it moderately focuses on high-value Union priorities, with 13% seeing a significant focus. Most surveyed authorities (74%) deemed continued EU support for border management and visa policy "very important," with priorities including investments in IT systems (e.g., ETIAS, EES), border surveillance, and operational support, such as Frontex's role. Among other stakeholders, 21% found the Thematic Facility significantly focused on high-value Union priorities, while 25% rated it as moderately focused. Uncertainty was notable, with 29% of stakeholders and 30% of public authorities unsure about its focus. Positive effects of BMVI projects for broader groups were observed by 25% of other stakeholders and 26% of public authorities. However, high uncertainty was reported, with 39% of other stakeholders and 48% of public authorities unsure about additional impacts beyond the primary project goals. Beneficiaries provided mixed feedback, with 29% recognising BMVI's focus on high-value priorities as significant and 31% as moderate, but 37% were unsure.

Broader benefits included strengthened Member State cooperation, improved communication with national authorities, and capacity-building, though some respondents noted no effects beyond primary project goals, reflecting limited spillover impacts and significant uncertainty in perceptions.

EU level interviews

Relevance

There was a strong consensus among all stakeholders consulted within EU institutions, agencies and bodies that BMVI was highly relevant in addressing the needs of the Union and its Member States, both in terms of their structural needs (e.g., through the national programme, specific actions, and transnational union actions) as well as their emergency needs (e.g., EMAS funding addressing unforeseen needs such as the Russian war of aggression in Ukraine and its impact on Member States in Eastern Europe).

Interviews confirmed that stakeholders within other EU Institutions, Agencies and services are consulted and provide inputs into Member States' programmes, Specific Actions, Union Actions and EMAS. For instance, **DG INTPA** and **EEAS** are consulted regarding actions touching upon cooperation with third countries, while **Frontex** is consulted for their technical and operational expertise and overview of the current and future challenges facing the EU. In addition, since 2021, Frontex, together with Member States, developed a new methodology through which Member States are required to implement foresight analysis in their contingency and capability plans (which inform the EIBM strategy and are expected to be used when developing BMVI's National Programmes) which was reported by interviewees as having resulted in more robust forward-looking needs assessments.

All stakeholders also highlighted BMVI's flexibility in addressing evolving needs by supporting project and programme adjustments and budget reallocations. In terms of new and emerging needs, several stakeholders within the Commission noted emerging needs such as interoperability of IT systems and the Pact on Migration and Asylum. Some also noted the need for more innovation and use of technologies, in particular AI, and a better understanding of their risks and possibilities.

Effectiveness

The effectiveness of the BMVI instrument was positively assessed by key stakeholders, though areas for improvement were highlighted. **DG HOME** emphasised BMVI's success in managing external borders, stressing the importance of adhering to policy goals to maintain effectiveness. It noted progress, particularly through the Schengen Evaluation Mechanism, but identified challenges such as COVID-19, increased migration flows, and domestic political factors affecting implementation. Rigorous monitoring tools like the Schengen Barometer were highlighted as essential to addressing problem areas. Significant investments in modernising the Visa Information System (VIS) and enhancing consular operations were recognised, though delays in visa appointments due to staffing shortages remain an issue. The under utilisation of funds for critical positions and political challenges in resource sharing were also noted, with a call for administrative simplification and better fund utilisation. Additionally, strengthening synergies with Frontex, centralising procurement, and increasing engagement with Managing Authorities were suggested to improve coordination. Other DGs, such as **DG EMPL**, noted

limited synergies with BMVI due to structural differences, while Frontex highlighted variations in national IBM programs and communication gaps among national authorities, particularly in larger Member States. International organisations like the **ICMPD** and **IOM** also reported positive impacts, including improved compliance with fundamental rights and enhanced reception facilities, though some noted confusion between the BMVI "regular" actions and the Thematic Facility.

Efficiency

The BMVI has proven to be efficient in supporting cost-effective measures. According to **DG HOME**, the BMVI has been widely utilised to finance IT expenditures related to visa systems, which is considered a straightforward and effective use of funds. Similarly, it highlighted that the BMVI supports cost-effective measures by providing targeted funding for specific recommendations and ensuring that resources are allocated to critical areas such as border surveillance and IT system updates. In addition, the management and control system of the BMVI is considered efficient, as it operates through a structured evaluation process. However, some Member States face challenges in implementation due to staff or funding issues, so that further simplification is deemed achievable by combining funds into a single European Interior Fund, which would enhance flexibility and coherence across various policy areas. Regarding the level of cost-effectiveness of Union Actions, it was emphasized that cost-effectiveness is a critical assessment element of the proposals, which are not funded unless they are deemed cost-effective. This aspect is scrutinized during the proposal evaluation to ensure that projects deliver results within a reasonable cost. As for **Frontex**, the agency noted that synergies and cooperation were ensured through consultations during the development of national programs and specific actions. This collaborative approach further enhances the cost-effectiveness of the BMVI. According to the **ICMPD**, implementers appreciated the technical support and quick response times provided by the BMVI, which have helped implementers manage projects effectively. ICMPD emphasised the continuous learning and capacity-building efforts to ensure the efficiency of the management and control system.

Coherence

EU-level interviews with **DG HOME** officials confirmed the internal coherence of the BMVI, including the complementary nature of the different funding modalities following their legal base, the internal mechanisms within DG HOME (e.g. the coordination unit) to secure coherence and new initiatives to further exploit synergies where possible. For example, to build successful investments in Union Actions into national plans (either funded by the EU or funded nationally). EU level interviewees also held positive views on the coherence between the BMVI and EU policies and priorities in the field of visa policy and border management, including the EBCG, the EIBM and EU Pact on Asylum and Migration. However, a few EU level interviewees noted the need to further strengthen the link between BMVI and the national capability roadmaps foreseen under the EBCG and EIBM.

In terms of the **external coherence**, EU level interviews confirmed that mechanisms are in place to ensure coordination between BMVI and other EU funding instruments. However, the interviews also confirmed that the required mechanism in place to ensure coherence between BMVI and EU external action (incl. actions funded under NDICI Europe and IPAIII) had been used to a limited extent to date, as only a limited

number of proposals under BMVI related to third countries. EU level interviewees noted that had not been aware of any overlaps between BMVI and other EU funding instruments, as the consultation process (formal and informal) would make sure such situations were avoided. However, some of the EU level interviews did highlight several challenges in their ability to assess the coherence of BMVI with other funding instruments, in particular in relation to the Member States Programmes – noting the need for more detailed information sharing. Moreover, some EU level interviewees highlighted the need to further strengthen the synergies between the BMVI and the CCEI (e.g. through the further use of the CPR provision of mutli-purpose funding) and with Horizon Europe (more follow-up funding of the Research and Development resulting from Horizon Europe).

EU Added Value

The added value of the BMVI was mainly appreciated by the DG HOME's directorates, more than by other stakeholders, particularly in terms of financial aspects and cross-border cooperation. According to **DG HOME**, the BMVI generates EU added value by ensuring Member States implement key elements of the Schengen acquis and addressing specific issues through targeted funding. As for Union Actions, while they may not reach different target groups, they can deliver outcomes that National Authorities might avoid due to high costs. The EU added value of Union Actions lies in initiatives that transcend national borders and enhance EU policy objectives. Moreover, DG HOME stated that the EU added value of the BMVI lies in its ability to mitigate the financial constraints and lack of incentivization that Member States would likely face without such support. Through targeted EU funding, the BMVI has encouraged Member States to invest in essential resources, including vessels and helicopters, for joint operations. For **DG NEAR**, the fund is highly desirable and has EU added value. Firstly, there is a financial rationale. Member States find it beneficial to use it to address gaps in their national funding. Moreover, the fund has EU added value because it can address the pressing need to develop operational cooperation between Member States and third countries. This cooperation is essential to effectively address and combat the networks involved in trafficking and smuggling migrations, which are often located in third countries. For other stakeholders, the question about the EU added value was either outside their area of expertise, or they did not express their views on the matter.

Focus group

In terms of **current needs**, participants cited specific external events, such as "Syria", "2015 migration crisis", "Ukrainian crisis" as drivers for increased need / pressures for border management against a backdrop of stretched capacity. IT systems featured heavily in the discussion of needs, there was mention of the need for innovation to allow for secure and smooth border process and efficiency, for development and maintenance of "big IT systems" / "large scale IT systems", and "enhanced security" as per the Smart Borders Package. In terms of **new/emerging needs**, participants highlighted a continued need for increased border surveillance in the context of the Russian war of aggression against Ukraine, the new mandatory border procedures stemming from the EU Asylum and Migration Pact, increased needs in the field of implementation of large-scale IT systems, data management and AI, and the new EU rules to digitalise the visa procedure that would need to be implemented gradually as from 2028 until 2035. In terms of the **relevance of types of activities** that could be funded under the BMVI, participants generally thought these were relevant, but noted

a few examples of items they would have liked to see funded but were not possible under the current fund (or were not funded enough): Participants were generally positive about the **flexibility of the fund**, noting that while inherently the funds were quite rigid, the Thematic Facility was a helpful mechanism to address emerging needs. Finally, some participants noted the need for better coordination on the EU funding across the different EU funds and agencies (e.g. Frontex).

Validation workshop

Relevance

As for the revision of MS Programmes, one participant emphasised the necessity to make it easier, to better align with evolving needs and obligations. The current framework for initiating and implementing changes is indeed seen as cumbersome and overly reliant on governmental approval, delaying the timely implementation of necessary changes and hindering the program's responsiveness to emerging challenges.

Effectiveness

As for the reporting, considered too lengthy and burdensome by Member States, mostly because of staff shortages, it was pointed out the necessity to balance this finding with the need for adequate administrative work backing the disbursement of funding. Moreover, it was emphasised that Member States have at their disposal a number of governance mechanisms to monitor progress that should be integrated into national programming.

Efficiency

As for the improvement of synergies between the "regular" measures and other actions funded by the Instrument (e.g., Union Actions, Specific Actions, etc.), it was pointed out that some overlaps might be inevitable without, however, covering the same activities or costs (e.g., the development of the Schengen Information System was partly financed through MS Programmes and partly through Union and Specific Actions). With regard to the number of Member States using Simplified Cost Options (SCOs), it was emphasised that many Member States use the union-level flat rate for indirect costs, but they do not describe it into their programmes.

Coherence

With regard to external coherence, a low level of awareness among national authorities was pointed out, partly due to the limited synergies between the three related funds (BMVI, ISF and AMIF), which, despite shared objectives, serve distinct purposes and beneficiaries. Coordination processes, especially for projects in third countries, require further development, with greater consultation to strengthen outcomes. It has been also asked to integrate fundamental rights and related requirements into the evaluation, while ensuring alignment with the appropriate dimensions of other funds, such as AMIF. Additionally, the European Commission emphasized the importance of the thematic facility and direct funding mechanisms but noted the low level of interest and applications from Member States, indicating that uptake challenges are more dependent on Member States than the Commission itself. A major challenge identified is the lack of a natural mechanism to transition research findings from Horizon Europe into development or commercialisation,

largely due to intellectual property rights being retained by project consortia. The absence of highlighted synergies with the European Defence Fund and CCEI was noted as a missed opportunity. There is also interest in understanding whether gaps between research, development, and market commercialisation have been bridged effectively. Lastly, it was suggested that security-related issues should be excluded from Horizon Europe's scope to maintain its focus on research and innovation.

EU Added Value

Participants agreed with the presented findings.

Country case studies

Effectiveness

National authorities across all countries' case studies confirmed BMVI's effectiveness, highlighting its capacity to achieve set goals, address specific challenges, and support comprehensive border management and visa policy initiatives. Across the eight countries, stakeholders consistently reported that the BMVI has significantly enhanced their operational capacities. For instance, in Greece and Italy, the program has been instrumental in improving surveillance capabilities and modernising border control infrastructures, which are critical given the high migratory pressures these countries face. The funding for advanced and interoperable IT systems and equipment was also highlighted as having enabled a more automated and efficient border management process across the EU as a whole, thereby reducing reliance on manpower and increasing overall effectiveness.

BMVI faced initial delays in most countries, and its implementation is still in its early stages. Therefore, stakeholders considered it too early to assess specific outcomes but considered that the instrument was on track to meet its goals. In some cases, stakeholders have expressed concerns about insufficient funding to meet growing demands, particularly in countries facing heightened security threats. Additionally, administrative burdens related to compliance and reporting requirements have been noted as potential obstacles to effective implementation.

Efficiency

Across the eight countries, national authorities generally reported positive assessments of BMVI's efficiency, particularly in terms of the management and control structures established. Across several Member States, procurement practices were highlighted as a key contributor to BMVI's cost-efficiency. Stakeholders from Italy, Croatia, and Romania reported that public procurement ensures high-quality, cost-effective solutions, supported by robust management and control systems. Additionally, stakeholders in Norway found calls for specific actions to be straightforward, allowing beneficiaries to achieve a favourable cost-benefit ratio. However, stakeholders from Poland and Greece reported struggling with public procurement, although it was due to public procurement rules in the countries, which often caused delays.

Administrative requirements often emerged as a key bottleneck. Authorities across countries, including Italy, Poland, Romania, and the Czech Republic, reported burdensome monitoring, redundant documentation requirements, and complex reporting processes. Specific Actions, in particular, were consistently flagged as

administratively intensive. The BMVI's design, particularly in Poland, demonstrated adaptability in responding to emergencies such as the Ukrainian refugee crisis, with swift and flexible funding mechanisms minimizing administrative delays. While initial implementation challenges exist, digital systems like Romania's RO-FED offer promise for long-term reductions in administrative burdens, enhancing procedural efficiency and management capabilities. Likewise, the effect of digital systems on efficiency was also confirmed by stakeholders from Croatia, which already started working on setting up an electronic system, from Poland where systems integration required a lot of work and the system was not well-tailored to the needs of the fund, and also from Greece where national programmes still relied on printed materials and the digital performance monitoring systems lacked the flexibility of a project management and monitoring tool.

There were mixed views on simplifying measures. Shorter contract periods and technical assistance were welcomed, but some raised concerns about sufficiency for complex projects. In certain countries (Greece and the Czech Republic), stakeholders reported insufficient staff, which limited the capacity to manage the programme effectively.

Coherence

Across the eight countries, national authorities confirmed that BMVI effectively complements other EU funding instruments, such as the Internal Security Fund (ISF) and the Asylum, Migration and Integration Fund (AMIF). Stakeholders also highlighted that actions co-financed by the BMVI are well-aligned with the Schengen Strategy and the European integrated border management framework, ensuring that interventions contribute to broader EU objectives.

Authorities also confirmed the coherence of BMVI with national initiatives and programmes with similar objectives, which ensured that interventions are consistent with broader policy goals. Different countries achieved this using different but effective coordination mechanism, such as different funds being overseen by the same Monitoring Committees (e.g. Romania) or managed by the same Managing Authority and/or the same Delegated Authority (e.g. Poland and Czech Republic), or the Managing Authority being part of the Ministry of Interior (e.g. Croatia). These mechanisms have facilitated coordination, ensuring that funded actions are complementary and do not overlap with other initiatives. Stakeholders have emphasised the importance of these in maintaining coherence across various funding sources and aligning interventions with national and EU policies.

There was a mixed view on synergies and complementarity. While some countries highlighted that BMVI fosters synergies with other EU instruments and/or national initiatives (such as, Italy, Poland and Romania), others (such as Greece, Czech Republic and to some extent, Croatia) noted that there were little to no mechanisms (which they were aware of) to support synergies or co-funding of projects.

Relevance

National authorities across all eight country case studies highlighted the strong relevance of BMVI, in particular in regard to border management activities (more so than the visa instrument). Stakeholders in Greece, Italy and Spain, which face significant and ongoing migratory pressures, highlighted the importance of BMVI funding in bolstering their border infrastructures and capabilities. Similarly,

stakeholders in Poland and Romania emphasized the relevance of the instrument in addressing irregular migration and enhancing operational capacity during emergencies – such as during the Russian war of Aggression against Ukraine. Implementing authorities and beneficiaries alike considered funded activities related to the development, upgrading, implementation and operationalisation of large-scale IT systems (and in particular, those required for border control and surveillance) as well as activities funding the purchase and maintenance of equipment and infrastructures to be among the most relevant.

Most national authorities agreed that the programme's design was also relevant as it allows for swift and non-substantial changes/ adjustments when new needs emerge. Similarly, stakeholders confirmed that BMVI allowed enough flexibility, particularly when certain emerging needs were identified, such as to respond to the increased pressure on Poland's eastern borders with Ukraine and Belarus. Moreover, interviews highlighted the importance of stakeholder engagement and participative approaches in identifying needs and adapting interventions, accordingly, thus ensuring the relevance of the BMVI. Stakeholders expressed concerns that the current funding levels may not be sufficient to meet the growing demands of border management, particularly in light of evolving security threats and increased migratory flows.

EU Added Value

In all countries examined, national authorities unanimously recognised BMVI's EU-added value in enhancing the capacity of managing external borders and visa policies effectively. Stakeholders consistently highlighted that the financial resources enabled countries to undertake initiatives that would not be feasible with national funding alone. For instance, BMVI has facilitated the procurement of advanced surveillance technologies and the implementation of interoperable large-scale IT systems. These investments not only improve national capabilities but also contribute to the overall security and stability of the Schengen area, thus demonstrating their EU-added value. Stakeholders noted that the EU funding allows for a more coordinated and comprehensive approach to border management, which is essential given the complex security landscape. The ability to pool resources and share best practices among member states (e.g., Union actions) and Frontex (e.g. specific actions) was also highlighted as having enhanced operational capacities and ensuring a unified response to shared challenges. This collaborative approach was noted as not only strengthening national systems but also reinforcing the collective framework of the EU.

Emergency Assistance

EMAS was assessed by all stakeholders consulted (EC, implementing national authorities and beneficiaries) as highly relevant. It addressed EU and Member States' needs for a solidarity financial instrument with a flexible fund component which can adapt the allocation of funding to respond to pressing and emerging challenges/emergencies in a flexible and timely manner. EMAS addressed that need under BMVI by providing emergency funding to assist Member States in reinforcing their capacity to respond to crises characterised by large or disproportionate numbers of arrivals or by incidents which have a decisive impact on border security.

Authorities consulted reported that EMAS's modalities were flexible, both in terms of its scope (i.e., the different activities it covers, the possibility of being used as a top-up mechanism, and the possibility of extending financing) and procedures (i.e.,

the application and approval process is quick, efficient, and not burdensome for the national authorities).

Moreover, EMAS was highlighted as internally coherent with the other modalities of BMVI (national programme including specific actions and Union Actions), as it has complementary objectives (i.e., addressing immediate emergency-related needs as opposed to structural and longer-term needs or transnational needs at the EU level). This internal coherence was also reported as ensured through the formal and informal coordination mechanisms in place to ensure complementarities and, where relevant, synergies across the management modes.

Specific Actions

National authorities consulted agreed that BMVI Specific Actions aligned with the specific needs identified in the Member States. However, stakeholders from multiple Member States noted that while Specific Actions provided essential support in addressing national priorities, they often did not fully cover the breadth of these needs due to limited funding, unclear timelines, and complex administrative processes.

Concerning coherency with other funds, BMVI Specific Actions were perceived as fostering cooperation between Member States and as being aligned with broader EU initiatives. However, due to their specificity, stakeholders reported limited potential for synergies with other national funding streams, which prevented duplication but also reduced the opportunity to enhance the scope of projects through national funding.

EU and national stakeholders considered that BMVI Specific Actions brought significant added value, particularly in enhancing the capabilities of Member States to manage their external borders and implement EU regulations. At the Union level, these actions contributed to a more cohesive and effective approach to border management, benefiting the entire EU by ensuring that Member States, especially those at the external borders, have the necessary resources to address shared challenges.

Union Actions

National authorities confirmed that Union Actions contributed to a wide range of possible activities, and their achievements varied in line with the specific rationale for a given action. Union Actions were perceived as providing a unique opportunity to finance activities that paved the way for new and better ways of working when they were conceived to develop a specific concept or product and were well implemented. They provided significant EU added value and were more efficient than if all Member States had conducted the activities independently.

However, stakeholders highlighted certain cases where the appetite to deliver activities was low for example due to sensitivities, which led to the Union's Actions not working out in practice. Furthermore, they acknowledged that, in certain instances, innovative projects and good practices were being developed, effectively communicated, and logical next steps were being pursued. However, there was a shared sentiment that additional efforts could be made to ensure that processes to ensure that possible synergies between Union Actions and actions at the national level are exploited in a more systematic manner. Stakeholders also confirmed that the Union Actions examined in the case study effectively demonstrated the

complementarity with indirectly managed actions under the Migration Partnership Facility, underscoring the interconnected nature of these funding initiatives.

Russian war of aggression

Feedback from national authorities and stakeholders within the Commission confirmed the usefulness of EMAS to address the challenges posed by the Russian War of Aggression in Ukraine and its impact on the EU. Stakeholders appreciated the swift availability of funds, noting that the process was significantly quicker than that of national programs. They highlighted that the application procedure was straightforward, allowing applicants to develop their proposals in a timely manner, and they were also pleased with the fast provision of funding. Most stakeholders' interviews highlighted that this was exactly what was needed at that particular moment of an emergency situation when most institutions dealing with border management had other priorities, had to manage the influx of refugees and staff was often delegated directly to the border.

The use of Financial Not Linked to Costs (FNLC) was praised for enabling quick project processing with low administrative overhead. However, national approaches to tracking EMAS funds varied: in Slovakia and Romania, funds contributed to the state budget, while in Poland, they were allocated to specific projects like developing perimeter systems at the Polish-Russian border. Despite the positive impact, stakeholders noted that EMAS funding was insufficient, with Poland and Slovakia considering AMIF more significant in managing the crisis due to its larger size and broader scope. Other funds, such as cohesion policy and REACT-EU funds, offered more flexibility but did not provide additional resources.

Horizontal priorities

The Fund's implementation has demonstrated some progress in aligning with horizontal principles, particularly in the areas of gender equality and digital transition, but the results remain uneven. The majority of national authorities and other stakeholders consulted, as well as 40% of beneficiaries believe that the BMVI implementation respects or promotes horizontal principles to a very large or large extent. However, more than one-fifth of the respondents including the national authorities, beneficiaries and other stakeholders have reported that they either do not know or prefer not to answer about the extent to which BMVI respects or promotes horizontal principles. Overall, although the fund's implementation is progressing towards effectively aligning with and promoting horizontal principles under shared management, it is difficult to track the extent to which these efforts have effectively led to tangible outcomes in terms of advancing gender equality and fundamental rights in this ongoing phase of implementation.