

Brussels, 25 September 2025
(OR. en)

13062/25
ADD 2

Interinstitutional File:
2018/0248 (COD)

JAI 1283
FRONT 210
ASIM 62
MIGR 299
CADREFIN 223

COVER NOTE

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| From: | Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director |
| date of receipt: | 16 September 2025 |
| To: | Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union |
| No. Cion doc.: | SEC(2025) 248 final |
| Subject: | REGULATORY SCRUTINY BOARD OPINION COMMISSION STAFF WORKING DOCUMENT EVALUATION Mid-term Evaluation of the Asylum, Migration and Integration Fund (AMIF) 2021-2027 |

Delegations will find attached document SEC(2025) 248 final.

Encl.: SEC(2025) 248 final



EUROPEAN COMMISSION

Brussels, 16.9.2025
SEC(2025) 248 final

REGULATORY SCRUTINY BOARD OPINION

**COMMISSION STAFF WORKING DOCUMENT EVALUATION
Mid-term Evaluation of the Asylum, Migration and Integration Fund
(AMIF) 2021-2027**

{SWD(2025) 270 final}
{SWD(2025) 271 final}



EUROPEAN COMMISSION
Regulatory Scrutiny Board

Brussels,
Ares(2025)

Opinion

Title: Interim evaluation of Asylum, Migration and Integration Fund (AMIF) (2021/2027)

Overall opinion: NEGATIVE

(A) Policy context

The Asylum, Migration and Integration Fund (AMIF) (2021-2027) is one of the three Home Affairs funds. With a total budget of EUR 11 billion it aims to support national capacities, improve procedures for managing migration, strengthen solidarity and the sharing of responsibility between Member States.

The mid-term evaluation covering the period up to mid-2024 is foreseen in the AMIF Regulation (EU) 2021/1147. The purpose of this mid-term evaluation is to look at the progress made in implementing the programme and assess whether actions are needed to ensure it duly delivers on its intended objectives.

(B) Key issues

The Board notes the additional information provided and commitments to make changes to the report.

However, the Board gives a negative opinion, because the report contains the following serious shortcomings:

- (1) While acknowledging limitations and data gaps, the report is not sufficiently underpinned with evidence and analysis, given the degree of financial implementation. The report does not sufficiently analyse the significant variations in implementation among the Member States. It is not clear what is the baseline and points of comparison regarding the achievement of objectives, considering the absence of the final evaluation of the Fund's previous programming period 2014-2020.**
- (2) The report does not sufficiently assess the intervention logic. It is also not clear whether the evaluation and monitoring framework in place will allow for drawing conclusions in the final evaluation of the programme.**
- (3) The report does not sufficiently analyse administrative costs.**
- (4) The assessment of coherence with the Pact on Migration and Asylum and with other EU funds is not sufficient. The report does not sufficiently assess the additionality of the AMIF to broader efforts of Member States' in these policy areas.**

This opinion concerns a draft evaluation/fitness check which may differ from the final version.

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(C) What to improve

(1) The report should more systematically refer to the existing evidence base and integrate more elements from the support study and case studies. With roughly EUR 3 billion allocated and EUR 1 billion spent, the report should integrate more data on outputs, results and costs in the effectiveness and efficiency analysis. The conclusions, in particular on effectiveness and efficiency, should be more nuanced and better aligned with the evidence available. Reporting on progress in financial implementation is not sufficient as evidence of effectiveness and efficiency, and to allow to conclude that the programme is on track to achieve its objectives.

(2) The report should deepen the analysis of how the situation was expected to evolve and how progress towards attaining objectives is measured and against what baseline. The mid-term evaluation report 2021-2027 should take into account the results of the final evaluation 2014-2020.

(3) Beyond documenting financial progress, the report should make use of available data on outputs and results to analyse effectiveness, intervention logic and provide preliminary assessment of causal links. The report should describe in more detail the monitoring and evaluation framework in place and assess the extent to which the data collected will make it feasible to evaluate **the achievement of the programme's objectives** in the final evaluation. The report should include an overview of indicators, points of comparison, 2024 milestones, quantified baselines for the indicators and correlate them with what should be considered success. 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. It should also assess the reasons behind the different degrees on implementation among Member States.

(4) Beyond acknowledging that there is room for improvement of monitoring, the lessons learned should include potential changes to the reporting system and the established indicators in order to ensure **the effective assessment of the fund's progress** in the final evaluation.

(5) The report should provide more details on administrative costs and their assessment. It should analyse to what extent different stakeholders' perceptions of complexity and cumbersome reporting are valid and assess the potential for improvement, simplification, and burden reduction. Given the current degree of implementation, the report should analyse the types of costs and provide underlying methodology.

(6) The coherence assessment should better explain the extent to which the programme is aligned with other EU funds (in particular, RFF, ESF and NDICI) and with the Pact on Migration and Asylum. The report should assess better how the AMIF 2021-2027 has addressed emerging needs and identified evolving ones instead of relying on elements related to the previous programming period. As regards EU added value, the report should also be clear in terms of the additionality of AMIF to measures funded by Member States, analyse any data gaps which could hamper the analysis of additionality in the final evaluation.

Some more technical comments have been sent directly to the author Service.

(D) Conclusion

The lead Service must revise the report before launching the interservice consultation.

The lead Service may resubmit to the Board a revised version of this report.

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| Full title | Mid-term Evaluation of the Asylum, Migration and Integration Fund for the 2021-2027 programming period |
| Reference number | PLAN/2023/1285 |
| Submitted to RSB on | 16 January 2025 |
| Date of RSB meeting | 12 February 2025 |

