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COMMISSION STAFF WORKING DOCUMENT

EVALUATION

Mid-term Evaluation of the Asylum, Migration and Integration Fund (AMIF) 2021-2027

{SEC(2025) 248 final} - {SWD(2025) 271 final}

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Glossary

<i>Term or acronym</i>	<i>Meaning or definition</i>
AMIF	Asylum, Migration and Integration Fund
APR	Annual Performance Report
ARM	Annual Reports of Migration and Asylum
BMVI	Integrated Border Management Fund – Border Management and Visa Policy Instrument
CEAS	Common European Asylum System
Common indicators	The set of indicators defined in Annex 8 of the AMIF Regulation (EU) 2021/1147
COVID-19	Coronavirus disease of 2019
CPR	Common Provisions Regulation
CSO	Civil Society Organisation
CST	Central IT System
DG	Directorate-General
DG ECHO	Directorate-General for European Civil Protection and Humanitarian Aid Operations
DG EMPL	Directorate-General for Employment, Social Affairs and Inclusion
DG HOME	Directorate-General for Migration and Home Affairs
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
DG REGIO	Directorate-General for Regional and Urban Policy
DG RTD	Directorate-General for Research and Innovation
Direct Management	In direct management, the European Commission is directly responsible for all steps in a programme's implementation.
EC	European Commission
EMAS	Emergency Assistance
EMN	European Migration Network
ERF	European Refugee Fund
ESF+	European Social Fund Plus
ESI	European Structural and Investment Funds
EU	European Union
Eurostat	European Statistical Office
EUAA	European Union Agency for Asylum
FEAD	Fund for European Aid to the Most Deprived
FIR	Final implementation report

<i>Term or acronym</i>	<i>Meaning or definition</i>
Frontex	European Border and Coast Guard Agency
FTE	Full Time Equivalent
Indirect Management	Funding managed by partner organisations or other authorities inside or outside the EU, e.g. national authorities or international organisations. The majority of the EU budget allocated to humanitarian aid and international development, for instance, is implemented under indirect management.
IOM	International Organisation for Migration
ISF	Internal Security Fund
JHA	Justice and Home Affairs
MA	Managing Authority
MS	Member States
NDICI	Neighbourhood, Development and International Cooperation Instrument
NGO	Non-governmental organisation
OECD	Organisation for Economic Co-operation and Development
RF	European Return Fund
RRF	Recovery and Resilience Facility
SA	Specific Actions
SCOs	Simplified cost options
SFC	Electronic data exchange system concerning the CPR Funds
SFI	Swedish for immigrants
Shared Management	In shared management, both the European Commission and national authorities in Member States, such as ministries and public institutions, are in charge of running a particular programme.
SM	Shared management
SO	Specific Objective
SWD	Staff Working Document
TA	Technical Assistance
TCN	Third-country national
TFEU	Treaty of the Functioning of the European Union
Thematic Facility	Part of the AMIF budget is periodically allocated to a Thematic Facility for the funding of its components, i.e.,: Specific Actions, Union Actions, Emergency Assistance, Resettlement and Humanitarian Admission, and to additional support for Member States contributing to solidarity and responsibility efforts (Relocation)

<i>Term or acronym</i>	<i>Meaning or definition</i>
Thematic Facility Work Programmes	Annual or multi-annual programming documents describing the interventions programmed in relation to the different components of the Thematic Facility
The Charter	EU Charter of Fundamental Rights
UA	Union Actions
UNHCR	United Nations High Commissioner for Refugees

1. INTRODUCTION

Purpose and scope of the evaluation

This Staff Working Document covers the mid-term evaluation of the Asylum, Migration and Integration Fund (hereinafter the ‘AMIF’ or ‘the Fund’) for the period 2021-2027 established by Regulation (EU) 1147/2021¹ (AMIF Regulation). The purpose and scope of this mid-term evaluation are set out in Article 34(1) of the AMIF Regulation, which requires the Commission to carry out by 31 December 2024 a mid-term evaluation of the fund, in particular 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 AMIF 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.

The evaluation covers both the Member States programmes (programmed by the Member States and implemented in shared management) and the AMIF Thematic Facility work programmes (programmed by the Commission and implemented in direct, indirect and shared management) (see Annex II for further information on the structure of AMIF 2021-2027 and the Thematic Facility). The Member States programmes absorb most of the AMIF budget (around two thirds). The majority of these programmes were approved in the last quarter of 2022.

The temporal scope of the evaluation covers the period from January 2021 until mid-2024. The geographical scope includes 26 Member States, i.e. excluding Denmark ².

Article 7 of the AMIF Regulation sets out the criteria under which third countries may be associated to the AMIF. However, no third countries are currently associated to the Fund.

As laid down in Article 3(1), the Fund contributes to the efficient management of migration flows and to the implementation, strengthening and development of the common policy on asylum and the common immigration policy, in accordance with the Union *acquis* and the international obligations of the Union and the Member States arising from the international instruments to which they are party.

Pursuant to Article 16 (11) AMIF, Member States willing to implement projects with or in a third country with the support of the Fund, should consult the Commission prior to the

¹ Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund. <http://data.europa.eu/eli/reg/2021/1147/oj>

² As per Recital (73) of the AMIF Regulation, in accordance with Articles 1 and 2 of Protocol No 22 on the position of Denmark annexed to the TEU and to the TFEU, Denmark is not taking part in the adoption of this Regulation and is not bound by it or subject to its application.

approval of those projects. The scope of support as regards actions in relation to third countries is set out in Article 5 (2) and (3) AMIF, which must also respect a number of conditions.

Given the partial implementation of the programmes by 30 June 2024, the mid-term evaluation primarily focuses on assessing the extent to which the regulatory structure, the Member States' programmes and the Commission's work programmes are effectively serving their purpose in view of the expected results and impacts, rather than at obtaining final conclusions on their effectiveness and efficiency.

In addressing the main evaluation criteria of relevance, effectiveness, efficiency, coherence, and EU added value, the evaluation primarily aims 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 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.
- whether the current monitoring and evaluation arrangements can be expected to generate sufficient evidence to measure the impacts of the fund by June 2029 (at Member State level), and by December 2031 (at EU level).

It should be noted at this point that, due to the mid-term nature of the evaluation and the delays which have occurred, only a limited assessment can be made regarding the effectiveness and efficiency of the programmes. Therefore, as outlined above, the focus of the analysis is on evaluating how well the regulatory framework as well as the programmes are fulfilling their intended objectives and impacts, rather than drawing overarching conclusions about effectiveness and efficiency of the fund. In doing so, relevant sources of information, including those mentioned in Articles 34 to 36 of the AMIF Regulation, have been considered.

The evaluation is based on thirteen evaluation questions organised around the five evaluation criteria of effectiveness, efficiency, coherence, EU added value and relevance:

Effectiveness	➤ To what extent is the fund 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? ➤ How was the involvement of the relevant partners ensured across all stages of the programming, implementation, monitoring and evaluation? ➤ To what extent does the fund respect or promote in its implementation the horizontal principles? ➤ To what extent is the fund effective in communicating and disseminating on its opportunities as well as achievements?
Efficiency	➤ To what extent does the fund 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 fund coherent with initiatives supported under its policy domain, in particular with support under the thematic facility across the different management modes? ➤ To what extent is the fund coherent with other EU instruments (including other Home Affairs instruments), and in particular with EU's external action?
EUAV	➤ To what extent is the fund generating EU added value?
Relevance	➤ To what extent does the fund address the evolving needs? ➤ To what extent can the fund adapt to the evolving needs?

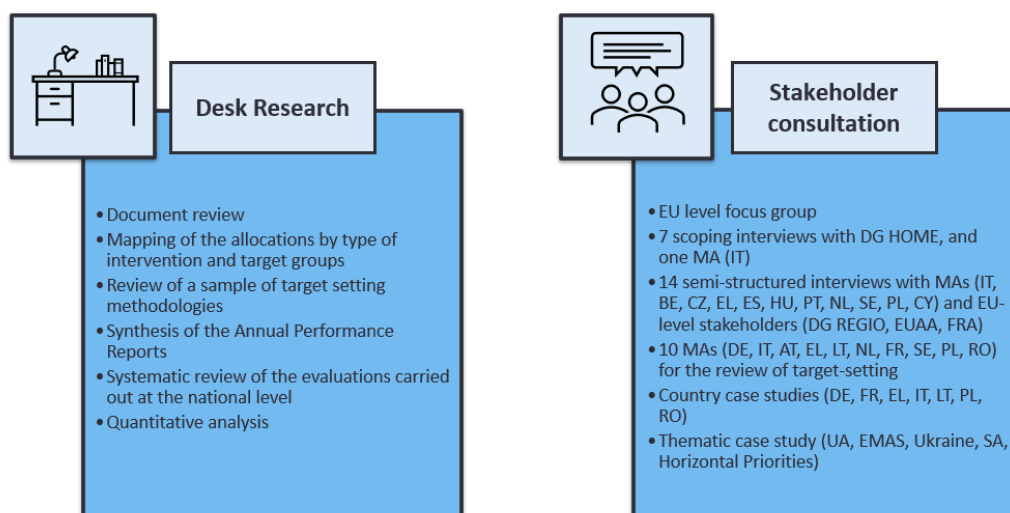
As the Commission is also requested to provide an ex-post evaluation report of the AMIF for the programming period 2014-2020³, it decided to carry out the preparatory work for both evaluations simultaneously, in order to facilitate the exchange of information and the use of common findings and analysis between both exercises. Nevertheless, this Staff Working Document presents the mid-term evaluation of the AMIF for the period 2021-2027.

The preparatory work for this evaluation was contracted to an external consortium composed by “Ernst and Young (EY)” and “Technopolis Group”. 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 stakeholders such as European Commission officials, implementing partners, and beneficiaries, as well as focus groups and targeted surveys. It included data analysis covering country case 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.

The approach to data collection is exemplified in the following:

³ Regulation (EU) No 516/2014 of the European Parliament and of the Council of 16 April 2014 establishing the Asylum, Migration and Integration Fund, amending Council Decision 2008/381/EC and repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council Decision 2007/435/EC. <https://eur-lex.europa.eu/eli/reg/2014/516/oj>

Figure 1: Data collection diagram



The document review was based on evidence obtained from a number of sources, including:

- the output and result indicators defined in Annex VIII to the AMIF Regulation, which are regularly fed to the Commission by the authorities managing the Member State programmes (hereinafter “Managing Authorities”),
- the annual performance reports produced every year, since 2023, by the Managing Authorities,
- the mid-term evaluations drawn-up by the Member States by 31 March 2024, according to article 44(5) of the Common Provisions Regulation⁴ (henceforward, the CPR),
- the Impact Assessment for the AMIF,
- any other studies, sources and reports, such as reports from grants in direct and indirect management, and from the European Court of Auditors, which may have provided useful information for the evaluation.

The data collection and analysis processes faced several limitations:

- inconsistent data quality and availability across Member States hindered comparisons;
- historical data was often incomplete, and errors in the Electronic data exchange system concerning the CPR Funds (SFC) data added to the challenges;

⁴ 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.

- variations in data granularity and programme maturity, as AMIF programmes were at different stages of implementation;
- low response rates in surveys;
- conceptual issues with certain common output and result indicators, which made it difficult to measure programme progress accurately.

2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

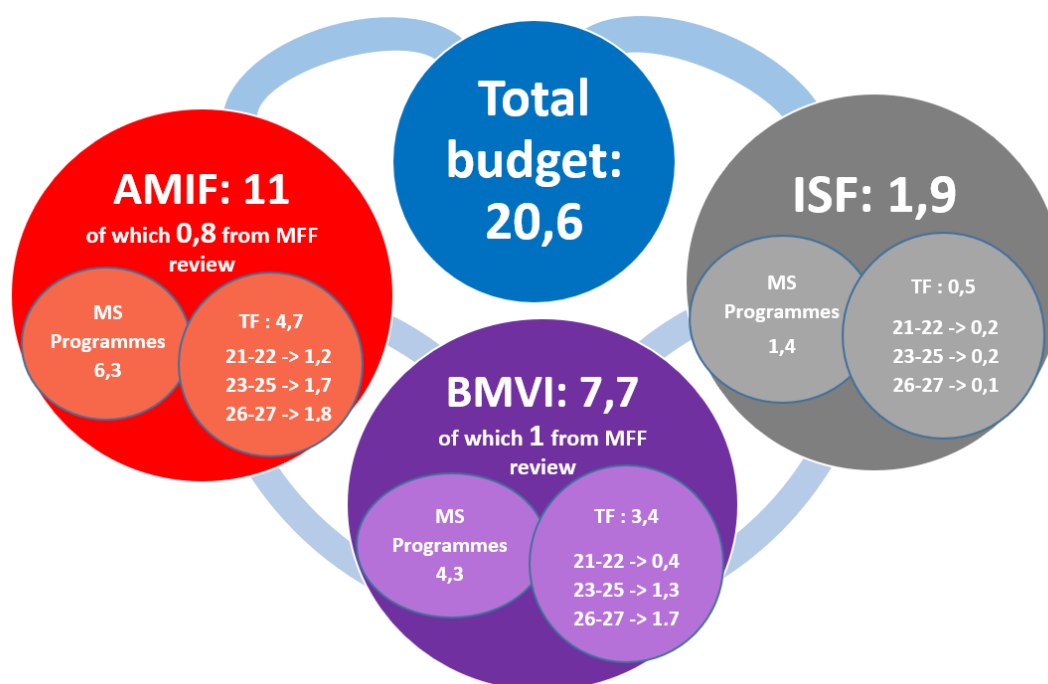
2.1 Description of the intervention and its objectives

The AMIF, along with the Instrument for Financial Support for Border Management and Visa Policy (BMVI)⁵ and the Internal Security Fund (ISF)⁶ for the programming period 2021-2027, collectively form the “Home Affairs Funds”.

The Home Affairs Funds contribute to complementary EU level objectives in the field of migration, border management and security.

Altogether the Home Affairs Funds amount to EUR 20,6 billion⁷.

Figure 2: Total budget the three EU Home Affairs Funds



⁵ 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 Regulation (EU) 2021/1148. <https://eur-lex.europa.eu/eli/reg/2021/1148/oj>

⁶ Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund. <https://eur-lex.europa.eu/eli/reg/2021/1149/oj>

⁷ As of 22 November 2024.

The AMIF 2021-2027 was preceded by the Asylum, Migration and Integration Fund (AMIF) 2014-2020 that was established by Regulation No 516/2014⁸ with the purpose of promoting efficient management of migration flows and the implementation, strengthening and development of a common Union approach to asylum and immigration. The creation of the AMIF 2014-2020 responded to a need to rationalise the architecture of different funding instruments under the Solidarity and Management of Migration Flows (SOLID) programme (2007-2013).

The 2018 Impact Assessment⁹ that accompanied the legislative proposals for the three Home Affairs Funds for the 2021-2027 programming period¹⁰ highlighted a number of developments over the previous programming period and corresponding challenges for the AMIF 2021 - 2027. In the area of asylum and migration, over the last decade, the EU has faced a very large, and growing, number of asylum seekers and migrants. The sudden increase in flows in 2015 and 2016 meant a shift in the scale of the pressure at the external borders and evidenced the need for a new, stronger, and more coordinated EU response. In the aftermath of the COVID-19 pandemic, continued and renewed pressure on the routes across the Mediterranean and the Western Balkans has become increasingly visible.

Other factors, such as geopolitical instability combined with economic and demographic factors and climate change have increased migratory and forced displacement pressure, which has been increasingly challenging for the EU migration, asylum, and border management systems. The challenges in the areas of asylum and migration are by their nature interlinked and cannot be adequately addressed by Member States acting alone. Moreover, the burden on individual Member States' migration and border management systems varies significantly.

The interim evaluation of the AMIF 2014-2020 has showed that EU funding, despite its relatively small size in comparison with the asylum and migration challenges at the level of the Union, provides a clear added value by supporting actions with a transnational dimension, boosting national capacities and optimising procedures related to migration management, and enhancing solidarity and responsibility sharing between Member States, in particular through emergency assistance and the relocation mechanism.

Both the interim evaluation of AMIF 2014-2020 and the Impact Assessment of HOME funds undertaken in 2018 have underlined the importance to support legal migration and integration of third-country nationals to face the decline in the EU's working age population, enhance the sustainability of social security systems and support growth. The Impact Assessment also identified the need to continue the support for actions in the

⁸ Regulation (EU) No 516/2014 of the European Parliament and of the Council of 16 April 2014 establishing the Asylum, Migration and Integration Fund, amending Council Decision 2008/381/EC and repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council Decision 2007/435/EC.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R0516&qid=1752827657455>

⁹ SWD (2018) 347 final ([LexUriServ.do](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018W0347)) Proposal for a Regulation of the European Parliament and of the Council establishing the Asylum and Migration Fund; Proposal for a Regulation of the European Parliament and of the Council establishing the Internal Security Fund; Proposal for a Regulation of the European Parliament and of the Council establishing, as part of the Integrated Border Management Fund, the instrument for financial support for border management and visa; Proposal for a Regulation of the European Parliament and of the Council establishing, as part of the Integrated Border Management Fund, the instrument for financial support for customs control equipment

¹⁰ COM/2018/471 final, Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the Asylum and Migration Fund

external dimension, complementary to the support provided by the external Funds, as well as for catering to specific needs of vulnerable groups, such as victims of trafficking in human beings and children in migration.

Overall, through AMIF, the EU has strived towards establishing an effective, safe and humanitarian European migration policy, which addresses both legal and irregular migration and considers the safety of people seeking international protection or a better life, as well as the concerns of countries who worry that migratory pressures will exceed their capacities. Together with the integrated management of the EU's external borders, the completion of a Common European Asylum System (CEAS) has contributed to share responsibilities and their financial implications between Member States fairly. In this respect, the AMIF funding is playing a very important role in providing financial and operational support to Member States under pressure, thereby upholding the principle of solidarity and fair sharing of responsibility.

Based on the Impact Assessment, the AMIF 2021 – 2027 pursues the general objective to contribute to the efficient management of migration flows and to the implementation, strengthening and development of the common policy on asylum and the common immigration policy, in accordance with the relevant Union acquis and fully respecting the international obligations of the Union and the Member States arising from the international instruments to which they are party. This general objective is further elaborated in the following four Specific Objectives (SOs):

1. strengthening and developing all aspects of the Common European Asylum System, including its external dimension (SO1);
2. strengthening and developing legal migration to the Member States in accordance with their economic and social needs, and promoting and contributing to the effective integration and social inclusion of third-country nationals (SO2);
3. contributing to countering irregular migration, enhancing effective, safe and dignified return and readmission, and promoting and contributing to effective initial reintegration in third countries (SO3);
4. enhancing solidarity and fair sharing of responsibility between the Member States, in particular as regards those most affected by migration and asylum challenges, including through practical cooperation (SO4).

2.2 Intervention Logics

To address the objectives above and illustrate the connection between the needs and how the AMIF implementation addresses those needs, an intervention logic has been developed for each specific objective. It provides a description of how and why desired changes is expected to happen as a result of the AMIF interventions.

Specific Objective 1: Asylum

The objective is to **strengthen and develop all aspects of the Common European Asylum System, including its external dimension**, by ensuring the uniform application of the Union acquis and priorities related to the CEAS. It supports the capacity of Member States' asylum systems, including infrastructure and services at various levels, and enhances cooperation with third countries to manage migration. This includes improving

protection for those in need of international protection and providing technical assistance to Member States in cooperation with the European Union Agency for Asylum (EUAA)¹¹.

The **target groups** addressed under this specific objective include all third-country nationals (TCNs) who are either in need of international protection, in migration, and those in need of resettlement or humanitarian admission. Furthermore, applicants for or beneficiaries of international protection or asylum are also targeted. The Fund aims to provide legal and sustainable support that responds to the needs of each target group, including those who are particularly vulnerable, such as children.

Under SO1, the AMIF addresses four key areas: reception conditions, asylum procedures, resettlement and humanitarian admission, and protection systems in third countries. Each of these areas addresses specific challenges through targeted interventions with intended tangible improvements in the asylum system¹².

Specific needs in **reception** include insufficient material aid, inadequate infrastructure, gaps in identifying vulnerable groups, and limited staff capacity. Additionally, detention is used, and links between reception and social inclusion need strengthening. To address these challenges, interventions focus on expanding and improving reception facilities, providing material aid, strengthening identification mechanisms for vulnerable groups, and training staff. Alternatives to detention and integration-focused support services are also developed. These measures aim to ensure that asylum seekers receive adequate assistance that infrastructure meets standards, and that trained staff apply best practices, including by fostering a more humane and effective reception system.

With regard to **asylum procedures**, inefficiencies arise from delays, backlogs, inconsistent decision-making, and barriers to legal and procedural support. Strengthening capacity, information-sharing, and digital tools is key to overcoming these challenges. The interventions are aimed at enhancing country-of-origin information systems, workflow efficiency, and accessibility of legal assistance. The intended result are accelerated procedures and facilitating fairer asylum decisions, based on better-informed and more transparent processes in Member States.

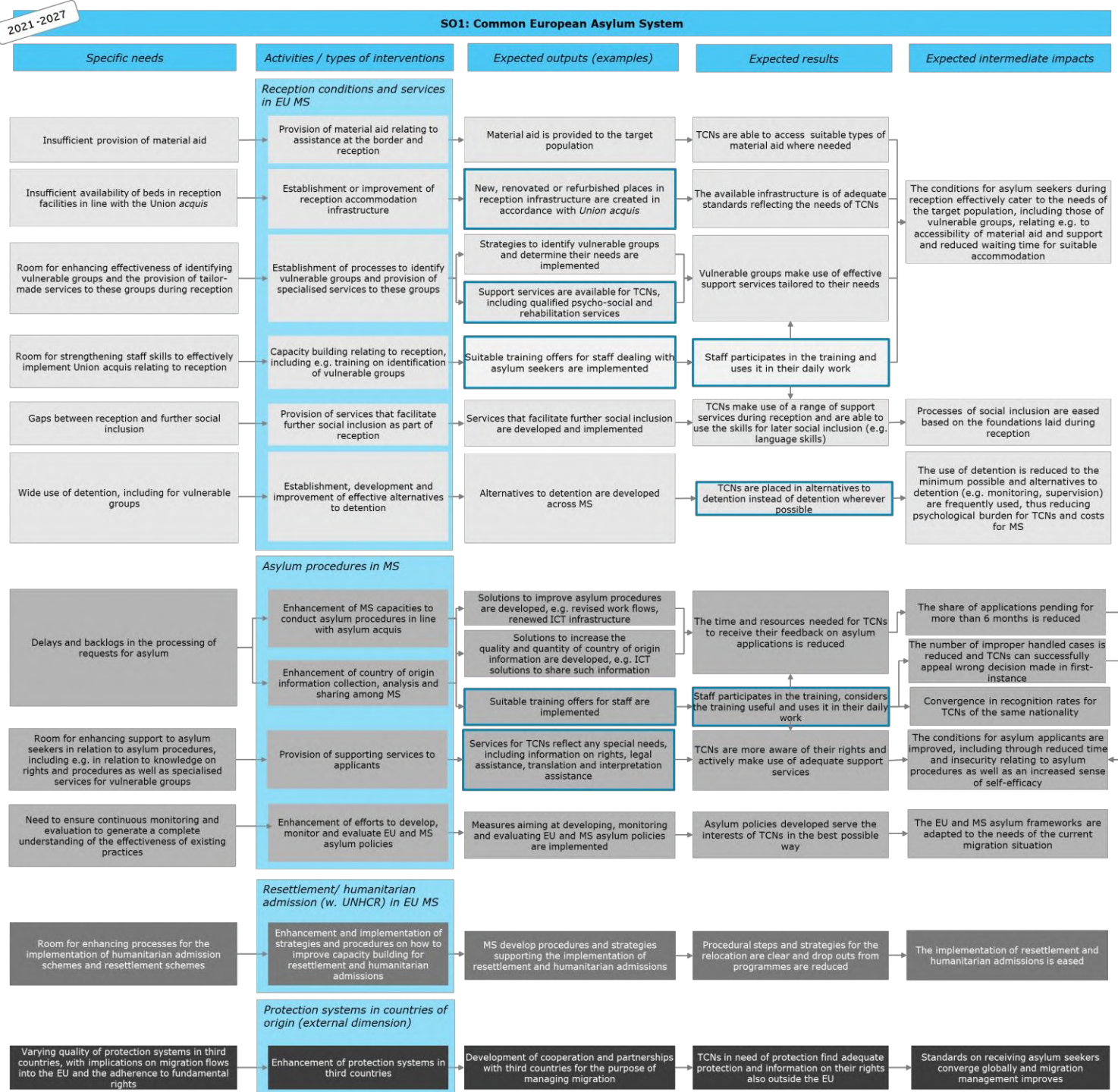
Specific needs in **resettlement** include unclear procedures and limited capacity, affecting its effective implementation. To improve this, the Fund's interventions focus on developing structured resettlement frameworks, enhancing procedural clarity, and strengthening coordination with UNHCR. These efforts intend to achieve more predictable and efficient resettlement processes, reducing dropout rates and improving access to protection for those in need.

With regard to the **external dimension**, protection systems in third countries impact migration patterns and compliance with fundamental rights. Support focuses on building asylum capacity, improving legal frameworks, and strengthening reception conditions. By enhancing protection in third countries, these measures contribute to safer migration management and greater access to asylum outside the EU.

¹¹ Annex II, point 1 d) of the AMIF Regulation

¹² Annex III point 1 of the AMIF Regulation

Figure 3: Intervention Logic for Specific Objective 1



Specific Objective 2: Legal Migration and Integration

The objective is concerned with **strengthening and developing legal migration to the Member States in accordance with their economic and social needs as well as promoting and contributing to the effective integration and social inclusion of third-**

country nationals. It aims to develop and implement policies that promote legal migration, including family reunification and enforcement of labour standards. It also focuses on facilitating regular entry and residence in the Union, enhancing cooperation with third countries, as well as promoting integration and social and economic inclusion of third-country nationals. This includes measures to facilitate family reunification and prepare third-country nationals for active participation in society.

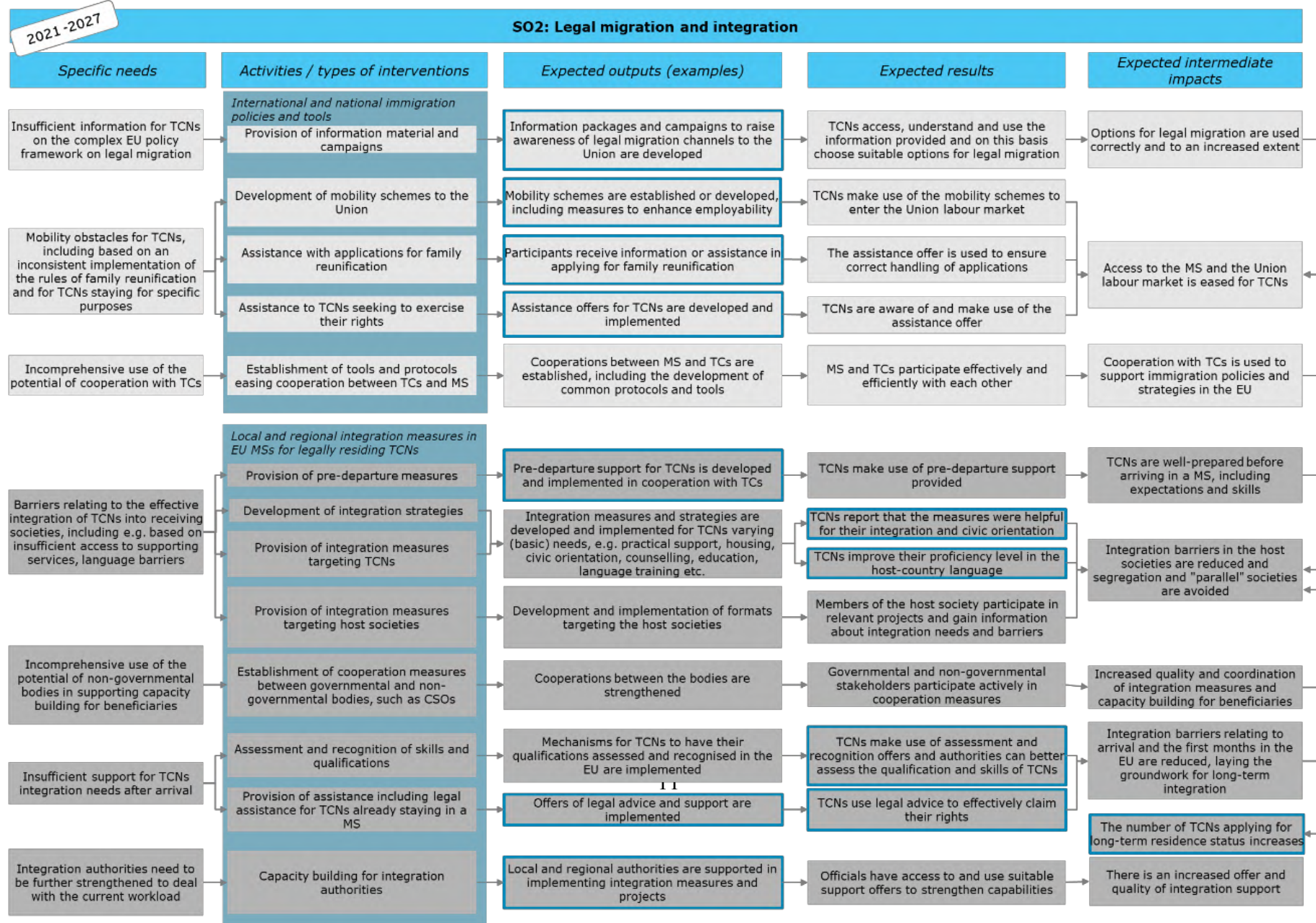
The main **target group** under SO2 are TCNs who are lawfully residing in an EU Member State or are in the process of obtaining such residency. Family members of individuals in the target group can also be included in the measures if necessary. The objective also includes those who have access to integration or professional language courses, have a residency permit, or have a permit for skilled employment or vocational training. The target group should receive tailored support to ensure successful integration and social inclusion, while meeting the economic and social needs of Member States. TCNs receiving information on legal migration pathways or participating in mobility schemes are also included.

Under SO2, the AMIF addresses two key areas: international and national immigration policies and tools and local and regional integration measures for legally residing TCNs. Addressing the specific needs in these areas aims to ensure that TCNs can access legal migration pathways, overcome barriers to integration, and participate fully in society.

Specific needs in the area of **international and national immigration policies and tools** include insufficient information for TCNs on legal migration opportunities, mobility obstacles, inconsistent family reunification procedures, and limited cooperation between Member States and TCs. TCNs often struggle to exercise their rights due to administrative complexities and a lack of structured support. To address these gaps, interventions focus on developing information campaigns, mobility schemes, and support mechanisms for family reunification and legal migration procedures. Additionally, cooperation between Member States and third countries is enhanced through structured tools and protocols. These measures aim to ensure that TCNs have better access to clear information, legal pathways become more transparent, and cooperation between countries strengthens migration governance. In the long run, this results in greater participation in mobility schemes and more efficient handling of migration-related applications.

At the **local level**, barriers to integration include limited access to services, language barriers, insufficient support after arrival, and underutilised cooperation with non-governmental bodies. Additionally, integration authorities face high workloads and require further capacity-building to implement effective policies. To strengthen integration outcomes, interventions include pre-departure measures, tailored integration strategies, language training, skill recognition mechanisms, and legal assistance for TCNs. Efforts also focus on enhancing cooperation between governmental and non-governmental bodies, supporting host societies in engaging with integration efforts, and providing training for integration authorities. These activities aim to provide TCNs with better access to services, improve language proficiency, and participate in civic and economic life, while local authorities and civil society strengthen their role in integration processes. Over time, these measures intend to contribute to more cohesive and inclusive societies, where TCNs can fully engage in their new communities.

Figure 4: Intervention Logic for Specific Objective 2



Specific Objective 3: Return

The objective is to contribute to **countering irregular migration, enhancing effective, safe and dignified return and readmission, and promoting and contributing to effective initial reintegration in third countries**. It supports an integrated approach to return management at both Union and Member State levels. The development of capacities for effective returns includes supporting assisted voluntary return, family tracing and reintegration, while respecting the best interests of the child.

The **target groups** under SO3 comprises those awaiting decisions on their residence permits, TCNs who opt for voluntary return to their countries of origin, individuals who do not meet the requirements for legal residence, including those for whom the enforcement of deportation has been postponed in compliance with the relevant articles of Directive 2008/115/EC, those who have already left the EU Member State either voluntarily or through a removal based on an administrative or judicial decision, and third-country nationals in migration who are in their countries of origin or in transit countries with the purpose of countering irregular migration.

Under SO3, the AMIF addresses four key areas: return procedures from EU Member States to third countries, reintegration support in third countries, deterring irregular migration, and pre-return conditions and services in Member States. Targeted interventions in these areas aim to ensure that return processes are effective, humane, and sustainable while deterring irregular migration and improving pre-return conditions.

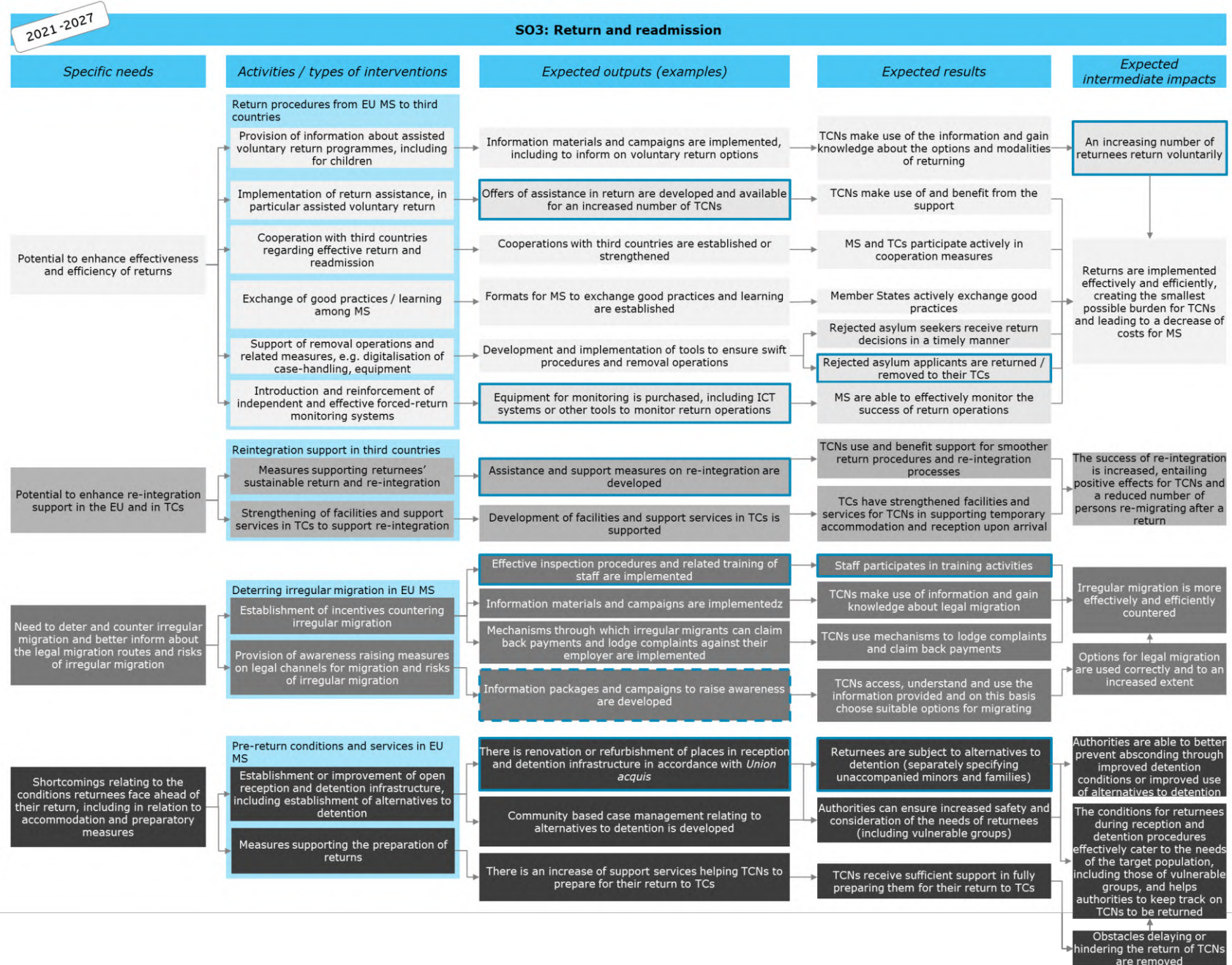
Enhancing the efficiency of **return procedures** and cooperation with third countries is essential for a credible return system. The interventions include providing information on voluntary return, strengthening return assistance, improving cooperation with third countries, and enhancing operational capacities. These efforts lead to greater awareness of return options, expanded support, streamlined procedures, and better monitoring of return operations, ensuring timely and effective returns.

Limited **reintegration** opportunities can lead to re-migration through irregular pathways. To address this challenge, the interventions focus on developing reintegration support and strengthening services in third countries. These measures help returnees rebuild their lives and ensure temporary accommodation and assistance, with the aim to create a more sustainable return system.

Lack of awareness about **legal migration** options contributes to irregular migration. To counter this, interventions include awareness campaigns, training for staff, and mechanisms for irregular migrants to claim back wages and file complaints. These efforts aim to provide the migrants with more and improved information, enforce migration regulations more strongly, and reduce irregular migration.

Ensuring **dignified and safe conditions for returnees** is crucial. Key actions include improving reception and detention facilities, developing alternatives to detention, and enhancing pre-return support. These measures lead to better accommodation, increased community-based case management, and improved return preparation, particularly for vulnerable groups.

Figure 5: Intervention Logic for Specific Objective 3



Specific Objective 4: Solidarity and Fair Sharing of Responsibility

This objective is to **enhance solidarity and fair sharing of responsibility between the Member States, in particular as regards those most affected by migration and asylum challenges, including through practical cooperation.** This includes supporting resettlement and humanitarian admission in the Union and transfers of applicants or beneficiaries of international protection from one Member State to another. This objective aims to foster a fair sharing of responsibility among Member States, particularly those most affected by migration and asylum challenges.

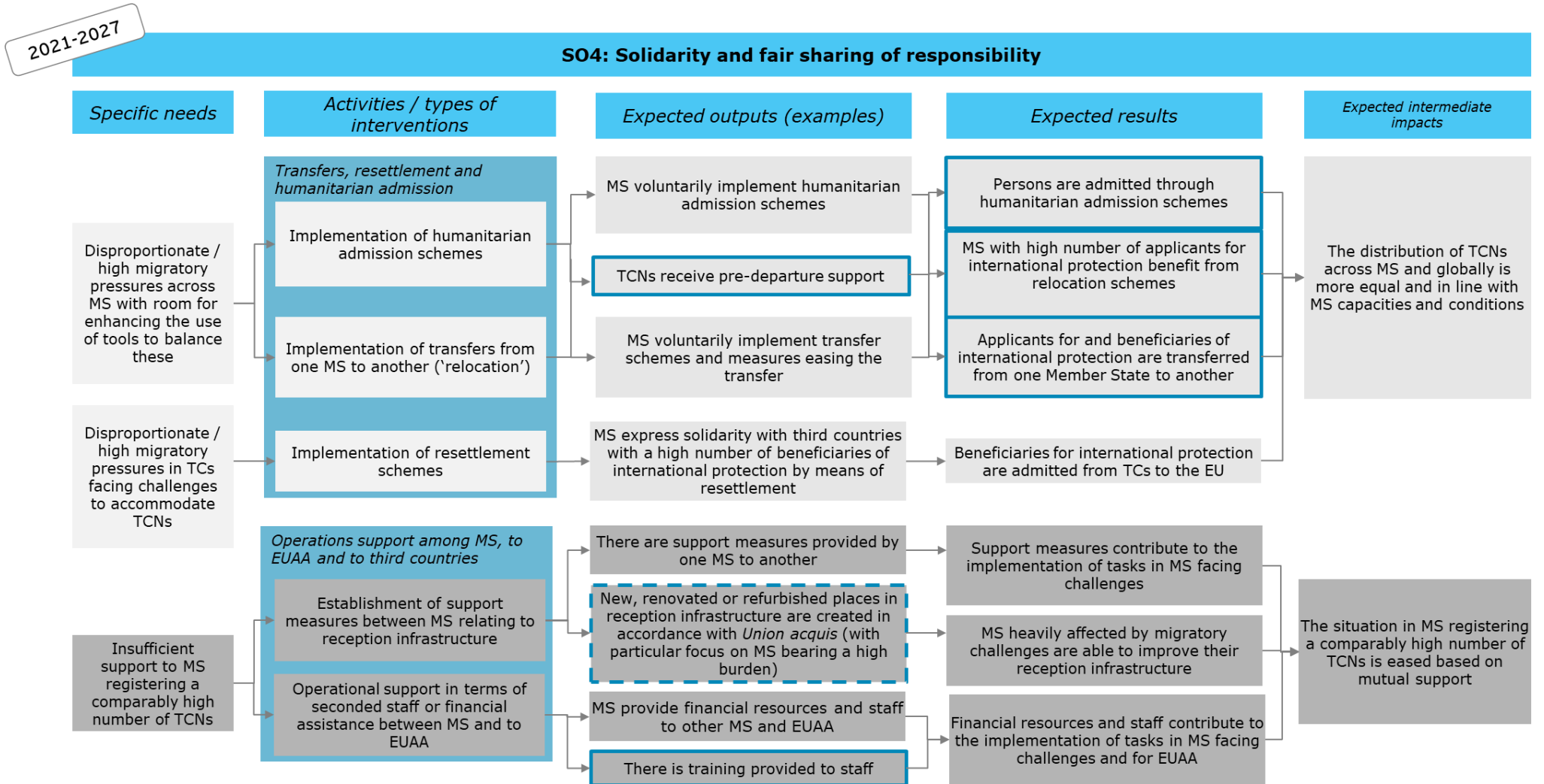
The main **target group** of SO4 is the Member States as the interventions aim to enhance Member States capacity to process applications for international protection and support applicants or beneficiaries of international protection. In addition, SO4 supports Member States resettlement and humanitarian admission efforts, thereby demonstrating solidarity with third countries impacted by a large number of persons in need of international protection.

Under SO4 (Solidarity and Fair Sharing of Responsibility), the AMIF addresses two key areas: transfers between Member States, resettlement and humanitarian admission, as well as operational support among Member States, to the EUAA, and to third countries. Targeted interventions ensure a more balanced sharing of responsibilities across the EU, strengthening migration management and supporting Member States and third countries under pressure.

Certain Member States and third countries face disproportionate migratory pressures, requiring mechanisms to redistribute responsibilities and provide safe pathways for those in need of protection. Interventions under the fund include implementing **humanitarian admission schemes, relocation within the EU, and resettlement from third countries.** These actions aim for greater voluntary participation of Member States in solidarity mechanisms, pre-departure support for TCNs, and the facilitation of transfers and resettlement procedures. Over time, these measures intend to relocate applicants and beneficiaries of international protection to Member States with greater capacity, while vulnerable persons are safely admitted to the EU from third countries.

Member States with high numbers of TCN arrivals often require additional **operational and financial support** to maintain adequate reception conditions and asylum procedures. To address this challenge, interventions focus on establishing support measures between Member States, enhancing reception infrastructure, and providing seconded staff and financial resources to Member States and EUAA. These efforts aim to improve the equipment of reception facilities, increase staffing capacity, and financial assistance where needed. In the long term, Member States facing migratory pressures can improve their reception systems and asylum processes, aiming to ensure a more effective and balanced EU migration system.

Figure 6: Intervention Logic for Specific Objective 4



2.3 Points of comparison

EU funding for asylum, migration and integration policy has developed and evolved over several funding period. Given this, and the early stage in delivery of the AMIF 2021-2027, it is hard to delimit where results from one funding period begin and end, there are also differences across Member States and external factors that contribute to progress (or the lack thereof). As such, it is useful to highlight the main structural differences between the AMIF 2021-2027 and the AMIF 2014-2020, starting with the allocation of funds, and several structural differences. This is complemented by the different elements for assessing the performance of the AMIF 2021-2027 against its predecessor, and other points of comparison (i.e. comparative progress across Member States, impact of external factors and comparisons with similar EU funds).

For the post-2020 period, four main challenges, applicable to the Home Affairs Funds, were identified by the 2018 Impact Assessment:

- a) Enhancing flexibility for allocating budget to the needs within a stable framework;
- b) Further simplifying the rules for implementing EU Funds;
- c) Ensuring more coherence and synergies between actions supported by EU funding instruments;
- d) 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.

To face those challenges, several features were introduced in the policy set-up and delivery model of the AMIF 2021-2027.

Comparison with AMIF 2014-2020

As indicated above, the main point of comparison is the performance of the AMIF 2021-2027 against its predecessor from 2014-2020 - although due note must be taken of the differences between the two funds in terms of resource allocation decisions and delivery before arriving at conclusions.

It should be noted that the ex-post evaluation was ongoing and at a preliminary stage at the time of writing this Staff Working Document, hence the final results regarding the ex post evaluation are not yet available to serve as a basis for comparison. As a response to the Russian war of aggression against 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 implementation as a continuum. This has allowed to have retrospective view, as well as complying with the requirement in the AMIF regulation (¹³) to take into account the results of the retrospective evaluation for the 2014-2020 period.

In addition, serving as best available data, the findings from the interim evaluation of the AMIF 2014-2020 programming period from 2018 as well as data from SFC2014 for implementation of the AMIF 2014-2020 up until the end of 2017 have been used as a point of comparison.¹⁴ Notably, since SFC2014 contains annual data for the implementation, the considered implementation period for the AMIF 2014-2020 is 6 months longer than the available data for the present evaluation, which covers an implementation period up until 30 June 2024. Therefore, caution must be applied with regard to the interpretation of comparisons of the progress made. Taking these precautions into account, at the mid-term stage of the AMIF 2014-2020, a total of EUR 4,27 million was allocated to the Fund, compared to the initially foreseen budget of EUR 1,70 million, representing a 152% increase relative to what was originally envisaged.¹⁵ In terms of financial progress, **about 60% of the allocated¹⁶ budget had been committed¹⁷ and paid** (EUR 2.6 billion) for activities under the AMIF by the end of 2017. **The largest share of funding was committed and paid for the National programmes (EUR 1.1 billion) and EMAS (EUR 1 billion).** Union Actions had about EUR 419 million committed and paid, and EMN had about EUR 54 million committed and paid. About EUR 14 million were committed and paid under Specific Actions.

In terms of physical progress, Member States made good progress in the achievement of targets for the common indicators listed in Annex VIII of the AMIF Regulation¹⁸ within the first three years of the 2014-2020 programming period. Notably, there had been **substantial progress for common indicators related to the number of target group persons who had received assistance co-financed by the AMIF**, such as the number of persons aided through projects in the field of reception and asylum systems (SO1 R1)¹⁹, as

¹³ Article 34(1).

¹⁴ The 2018 Interim evaluation has been conducted at roughly the same point in time during the implementation phase as the present mid-term evaluation. The data that informed the 2018 Interim evaluation comprises an implementation period up until 30 June 2017, corresponding to the data used for the present mid-term evaluation which includes implementation up until 30 June 2024.

¹⁵ Numbers on overall allocated resources (until end of 2017) are taken from the 2018 Interim evaluation of the AMIF 2014-2020.

¹⁶ Allocated resources correspond to the resources that have been designated to each specific objective and each country. They represent the programming stage of AMIF.

¹⁷ 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.

¹⁸ A list of the common indicators is provided in Annex II.

¹⁹ By the end of 2017 a total of 1,348,245 target group persons had been supported by the fund through projects in the field of reception and asylum systems, out of 1,263,700 persons planned across all Member States.

well as the number of persons aided through integration measures (SO2 R2)²⁰. Likewise, the overall target for the number of persons trained in asylum-related topics with assistance of the fund (SO1 C3.a) had been achieved for the most part.²¹

Increased funding for AMIF in the 2021-2027 programming period

The AMIF 2021-2027 benefits from a significantly larger financial allocation compared to its predecessor. In response to the migratory and security crises that occurred in the previous period, the AMIF budget increased from almost EUR 3.14 billion in the 2014-2020²² period to EUR 9.88 billion for the 2021-2027 programming period²³.

Increased Flexibility

First, to increase financial flexibility and increase the response capacity of the instrument to critical situations, a “Thematic Facility” was created “to respond to pressing needs and changes in policy and Union priorities, and to steer funding towards actions with a high level of Union added value”²⁴. Accordingly, part of the AMIF funding is periodically allocated, via the Thematic Facility, to Specific Actions (implemented through the Member States programmes, in shared management), to Union Actions, to actions of local and regional authorities, to emergency assistance, to resettlement and humanitarian admission, and to additional support for Member States contributing to solidarity and responsibility efforts.

In addition, based on the insight gained in the 2014-2020 period that fixed allocations do not always permit to reflect the changing needs of the Member States over time, for the 2021-2027 programming period, the AMIF includes the allocation of additional funding following a mid-term review, ensuring that funding is allocated based on performance and the effective use of previous allocations.

Legal Framework

A significant point of comparison is the shift in the legal framework governing the AMIF. In terms of simplifying the rules and streamlining the AMIF, along with the other Home Affairs Funds, has been included under the scope of the CPR. The CPR provides common rules for the implementation of eight Funds (including those under Cohesion and Maritime and Fisheries policies) in shared management. The application of the CPR rules to AMIF and other Funds was also meant to enhance the overall coherence and synergies among those Funds. It also entailed a refocus on performance, with more regular reporting on outputs and results, and the promotion of performance-based tools, such as financing not linked to costs. The 2021-2027 CPR has also enhanced the legal framework for simplified cost options. For instance, as regards grants provided to beneficiaries, Member States can increasingly make use of the simplified cost options since the regulation provides methods

²⁰ By the end of 2017 a total of 2,916,996 target group persons had been supported by the fund through integration measures (in the framework of national, local and regional strategies), out of 2,618,062 persons planned across all Member States.

²¹ This refers to the sum of implemented values compared to the sum of target values across Member States. By the end of 2017 a total of 22,898 persons had received training in asylum-related topics, out of 25,205 persons planned across all Member States.

²² Overall allocated resources (2014 to 2020) are taken from the 2018 Interim evaluation of the AMIF 2014-2020.

²³ These are the initial financial envelopes.

²⁴ Recital 44 of the AMIF Regulation.

and rates that are able to be used without the requirement for Member States to carry out a calculation or define a methodology. Furthermore, the threshold linked to the obligatory use of simplified cost options is linked to the total costs of the operation in order to ensure the same treatment of all operations below the threshold, regardless of whether the support is public or private. Finally, simplified cost options can be used at two reimbursement levels: (1) reimbursement of the Union contribution by the Commission to the Member States' programmes and (2) reimbursement of grants provided by the Member States to beneficiaries.

The reporting and monitoring framework for the AMIF 2021-2027 has also been improved to better enable tracking of whether the AMIF delivers the intended results and to inform potential changes to policy intervention (Articles 33 and 36 of the AMIF Regulation). Progress towards the Fund's specific objectives is tracked using common output and result indicators listed in Annex VIII of the AMIF Regulation, with output indicators starting from a baseline of zero and setting cumulative milestones for 2024 and targets for 2029.

The Performance Framework

The integration into the CPR rules 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 the 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. Pursuant to Article 33 (3) AMIF, Common outputs and result indicators assess the progress of the Fund towards the specific objectives set out in Article 3(2) AMIF, are laid down in Annex VIII of AMIF. Targets and milestones as set out in Article 2 (11) and (12) of the CPR respectively, also allow the Commission and the Member States to measure progress towards the achievement of the specific objectives²⁵. Pursuant to Article 33 (3), the baseline for output indicators should be at zero at the beginning of the programming period. The result indicators measure results linked to the operations funded and were also set as zero as they were linked to the output indicators²⁶.

The definition of targets belongs to 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 while allow to aggregate targets and results at EU level in order to assess overall progress when it comes to the retrospective evaluation.

²⁵ Article 16(3) of the CPR.

²⁶ Article 33(3) of the AMIF Regulation.

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.

3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD?

All the **26 AMIF Member States programmes were approved by the end of 2022**, the majority of them during the last quarter. This delay was mainly due to the late adoption of the legal framework (June 2021), as the respective negotiations were in turn delayed by the Covid-19 pandemic. The initial Member States programmes cover the **initial allocations** allocated to each programme for the period 2021-2027, for a total amount of around EUR 5.2 billion in Union contribution (of which 66% allocated to five Member States: Germany, Greece, France, Spain and Italy)²⁷. Over time **allocations from the Thematic Facility to the Member States programmes** (via Specific Actions, Resettlement and Humanitarian Admissions and Relocation) have increased the budget covered by the Member States programmes to around EUR 6.2 billion by 30 June 2024. The bulk of this increase is represented by the resources planned in relation to resettlement and humanitarian admission, which reached an amount of around EUR 844 million in Union contribution in 11 Member States (BG, DE, ES, FR, FI, IT, NL, PT, RO, SE, SI). The additional resources from the Thematic Facility for resettlement, humanitarian admission and relocation have been allocated through amendments to the Member State programmes.

An additional amount of around EUR 1 billion, for the period 2025-2027, is being allocated to the Member States programmes in 2025, subject to the reaching of a minimum spending level of 10% of the initial allocations by 31 December 2024²⁸. Also in this case, this is being implemented through amendments of the Member States programmes, to be submitted by the relevant Member States during the year 2025. Further to the mid-term review pursuant to Article 17 AMIF, Member States should not be eligible to receive additional allocations to the programmes not satisfying the minimum spending level laid down in Article 17 (2) AMIF. If the amount set out in Article 13 (1), b), AMIF for the adjustments of the allocations to the Member States' programmes referred to in Article 17 (1) AMIF, the remaining amount may be allocated to the budget of the AMIF Thematic Facility work programmes pursuant to Article 10(2), b) AMIF, for the years 2025, 2026 and 2027.

The **first AMIF Thematic Facility work programme, covering the years 2021 – 2022**, was adopted on 25 November 2021, for an overall amount of EUR 879,681,861. A separate work programme only covering emergency assistance (EMAS) for 2021 (EUR 80,000,000) was adopted on 17 August 2021. This was due to the need to mobilise quickly funding under EMAS (see below). Also, the first work programme for the European Migration Network (EMN) covering the period 2021-2022 was adopted separately, on 26 November 2021, as the procedure for the adoption of this work programme is different from the procedure applying to the AMIF work programme. The budget assigned to the

²⁷ For some Member States the initial programmes also included amounts allocated from the Thematic Facility in relation to Resettlement and Humanitarian Admission.

²⁸ Article 17(2) of the AMIF Regulation: where at least 10 % of the initial allocation to a programme referred to in point (a) of Article 13(1) of this Regulation has not been covered by payment applications submitted in accordance with Article 91 of Regulation (EU) 2021/1060, the Member State concerned shall not be eligible to receive the additional allocation for its programme referred to in point (b) of Article 13(1) of this Regulation.

EMN work programme is EUR 22,976,000. By mid-2024 the AMIF work programme 2021-2022, the specific EMAS 2021 work programme and the EMN work programme were fully implemented, meaning that the corresponding budget was fully committed, either by allocating additional resources to the Member States' programmes (Specific Actions, resettlement, and relocation, implemented in shared management) or through grants and other administrative arrangements (Union Actions, implemented in direct or indirect management). The AMIF work programme 2021-2022 was amended six times over the last years, to adapt its content to evolving needs, thus underpinning the financial flexibility built in the Thematic Facility instrument.

As regards the **second round of Thematic Facility work programmes for the period 2023 - 2025**, the AMIF work programme was firstly adopted on 23 November 2022 with a budget of EUR 1,490,539,000 and subsequently amended five times by mid-2024. The EMN work programme was adopted on 17 October 2022, with a budget of EUR 36,000,000.

The initial implementation of the funding was substantially affected by the Russian war of aggression against Ukraine, and the related inflow of persons benefitting from Temporary Protection in the EU. This situation created an unforeseen and acute pressure on the asylum and reception systems in a range of Member States, both for those sharing the border with Ukraine and other Member States, such as Germany and Czechia. Similarly, the **instrumentalisation of irregular migration at the EU Eastern borders** led to historically high migration flows into Latvia, Lithuania and Poland, also exposing them to extraordinary pressure. **In response, the Commission mobilised support in the form of emergency assistance under the AMIF 2021-2027.** Since this happened at a time when the Member States programmes were not yet approved, the quick mobilisation of EMAS was particularly important. In addition, **the legislative framework governing the 2014-2020 period was modified**²⁹, to prolong by one year the implementation period (i.e. from June 2023 ³⁰to June 2024) and to introduce financial flexibility for Member States to reallocate amounts, which were technically earmarked for specific purposes (e.g. resettlement) in the programmes. That allowed to quickly mobilise financial resources for the Member States to face immediate needs in the aftermath of the Russian war of aggression against Ukraine, notably in relation to asylum and reception systems, as well as early integration of persons fleeing the war. The extension of the 2014 – 2020 programming period also prolonged the overlapping period between the AMIF 2014 – 2020 and the AMIF 2021 – 2027, thus entailing additional pressure on the administrative system and relevant authorities of the Member States.

²⁹ Regulation (EU) 2022/585 of the European Parliament and of the Council of 6 April 2022 amending Regulations (EU) No 514/2014 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, (EU) No 516/2014 establishing the Asylum, Migration and Integration Fund and (EU) 2021/1147 establishing the Asylum, Migration and Integration Fund. <http://data.europa.eu/eli/reg/2022/585/oj>

³⁰ Commission Implementing Decision C(2021) 6023 final of 17.8.2021 on the financing of the Emergency Assistance component within the Thematic Facility of the Asylum, Migration and Integration Fund and the adoption of the work programme for 2021. As amended by Commission Implementing Decision C(2021) 9622 final of 17.12.2021. Also funded through Commission Implementing Decision C(2021) 8458 final of 25.11.2021 on the financing of components of the Thematic Facility under the Asylum, Migration and Integration Fund and adoption of the Work Programme for 2021 and 2022, as amended.

As regards the **progress in the execution of the Fund**, by mid-2024 the **Member States programmes were still at a relatively early stage of implementation**. As a common pattern to all funds implemented in shared management, Member States need time before being able to allocate and spend their appropriations. This includes the time necessary for setting-up the necessary structures and procedures, as well as for completing project selection procedures, which is a prerequisite to spending the budget.

Moreover, information retrieved from the Annual Performance Reports³¹ points to **delays in the start of the implementation on the ground (launching calls and their attribution to the final beneficiaries) in Member States due to more specific challenges**, such as:

- the national legal framework requiring a lengthy procedure and many steps for the implementation of public tenders and the conclusion of contracts;
- delays in the decision making on the institutional set-up governing the management of the programme (change in the Managing Authority, etc.) and the attribution of the necessary human resources.
- complex application procedures and the applicants' lack of experience with EU funding, along with a certain complexity in the development and understanding of the new IT system for these procedures
- delays attributed to the incorporation of the requirements under the CPR in relation to the Home Affairs Funds, requiring administrative efforts by the Managing Authorities in parallel to the programming exercise in 2022 and often still throughout 2023.

Remedial actions to overcome the initial delays and accelerate the implementation of the programmes were put in place in several Member States. These generally relate to increasing human resources and strengthening coordination between different actors (e.g. stricter collaboration with the International Organization for Migration (IOM)), simplification of administrative procedures, and IT developments.

On average, by June 2024, **45.9% of the Member States programmes allocations (including allocations transferred from the Thematic Facility) was committed with final beneficiaries (“operations selected for support”), of which 13.9% was already paid**. The most advanced programmes in terms of spending³² were Finland (36%), Sweden (35%), France (29%), Greece (16%) and Germany (15%). Spending levels were still at zero in four Member States: Slovakia, Poland, Hungary and Ireland.

When looking at the funds committed under both the Member States programmes and the Thematic Facility³³, **the support dedicated to reception conditions, legal pathways (including resettlement and humanitarian admission) and integration measures account for the largest share of resources committed**, with a total of EUR 2.4 billion

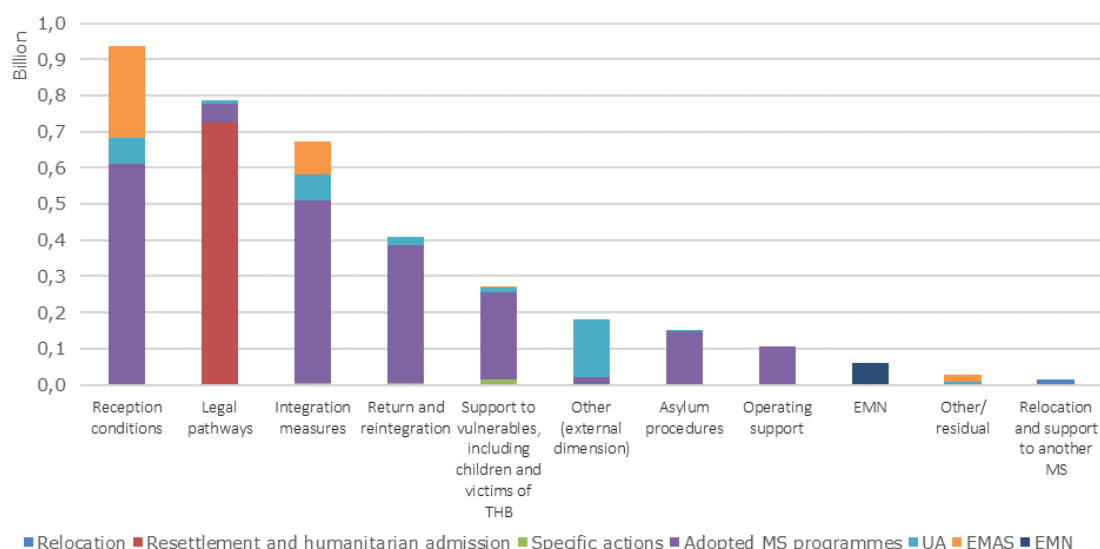
³¹ In accordance with Article 35 of the AMIF Regulation.

³² Spending refers to EU payments made in response to an interim payment application to the EU for eligible expenditure incurred and paid to project beneficiaries.

³³ Resources committed 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.

(66% of the total of committed resources). A sizable part of the Union Actions component of the Thematic Facility supports projects in the field of external dimension, via funding to the Migration Partnership Facility and the Regional Development and Protection Programme. Specific Actions contribute to different areas of support with a clear focus on vulnerable persons, including children and victims of trafficking in human beings.

Figure 7: Resources committed by areas of support and Fund component (in EUR, at 30/06/2024)



Source: Mid-term Evaluation study report, based on SFC 2021

4. EVALUATION FINDINGS (ANALYTICAL PART)

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

4.1.1 Effectiveness

Given the late start of the implementation of the Fund, the evaluation is not in a position to provide an assessment on its effectiveness. 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 achieving the objectives by the end of the programming period.

Progress in the implementation of Member States' programmes

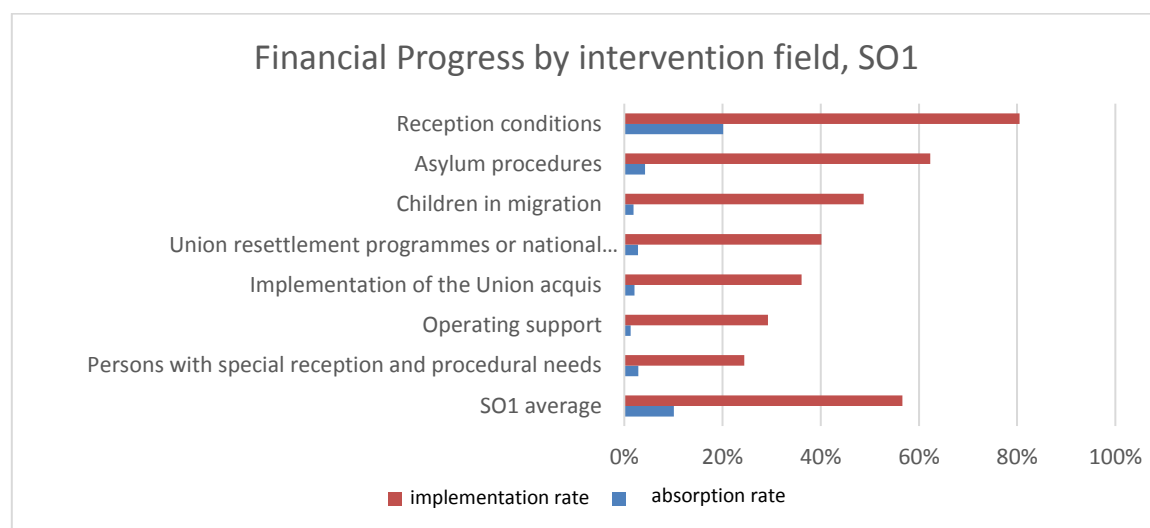
Financial Progress

After approximately 1.5 years from the approval of the Member State programmes, financial progress is visible across all Specific Objectives (SO), with **nearly 46% of the allocated resources committed to selected operations. The absorption rate³⁴ (resources paid, 11% on average) is the highest under the CPR, especially for SO1 (Common European and Asylum System) and SO2 (Legal Migration and Integration).** This reflects a continuing high level of needs from the target groups as well as the ability from all actors involved in the implementation of the Fund to offer timely

³⁴ This corresponds to the ratio between the costs declared and the allocations. It measures the effective implementation of activities.

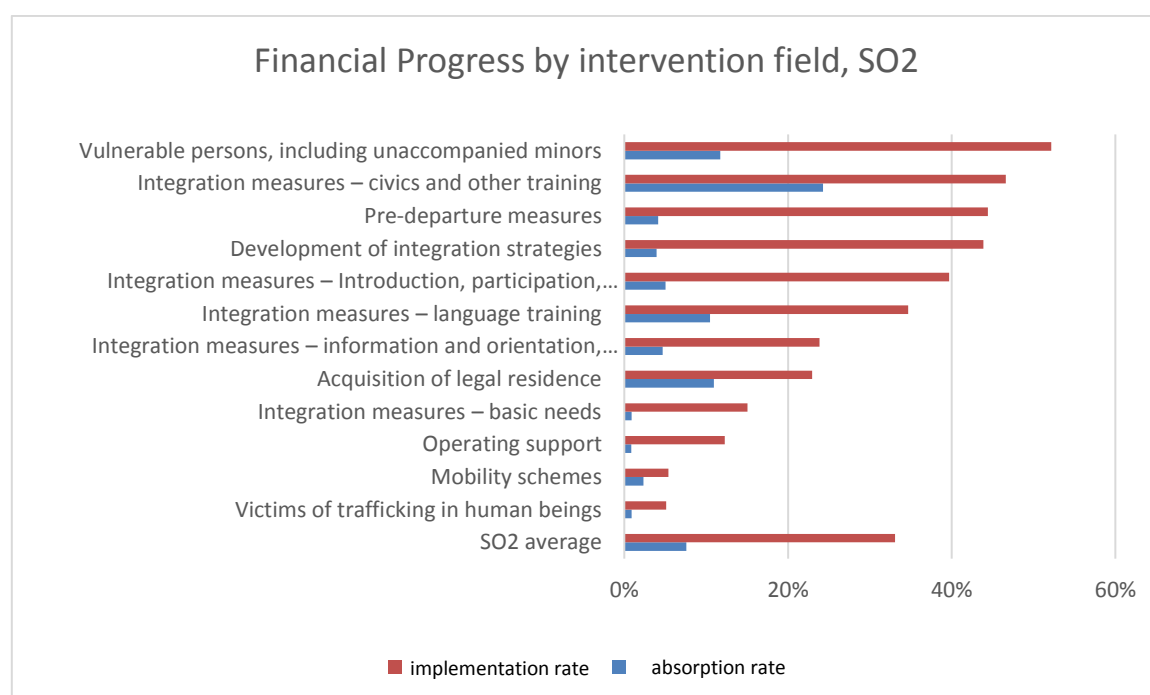
support. The financial progress by Specific Objectives and main areas of support, by 30 June 2024 are given in the following graphs:

Figure 8: Financial progress by intervention field for SO1



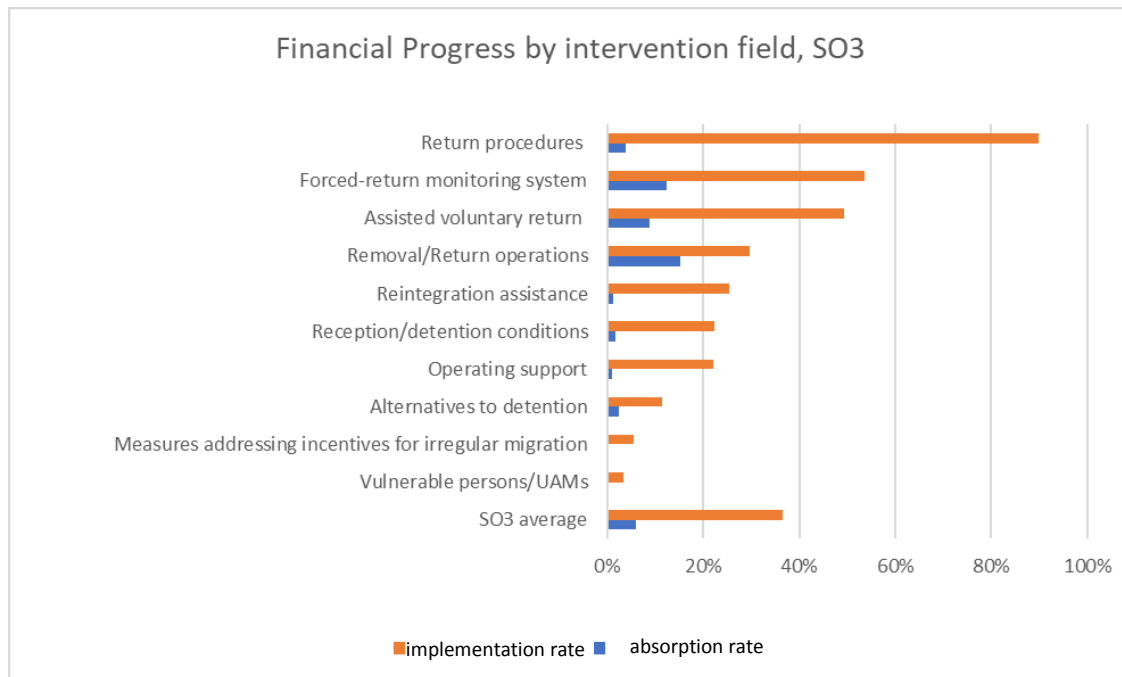
For SO1 (Common European and Asylum System), the high rate of commitments in relation to “Reception Conditions” are most probably triggered by the high number of persons benefiting from temporary protection due to the Russian war of aggression against Ukraine.

Figure 9: Financial progress by intervention field for SO2



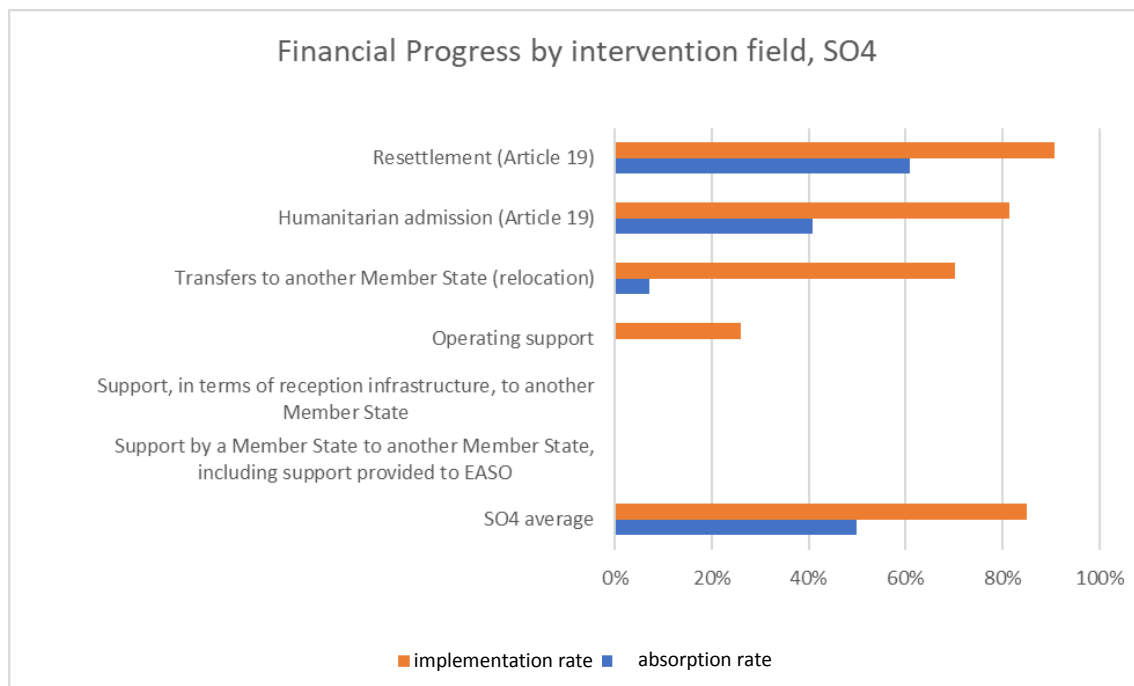
For SO2 (Legal Migration and Integration), integration measures show the best ratio between resources committed resources and resources paid, also in this case following a similar pattern as SO1. Mobility schemes and support to victims of trafficking in human beings show a relatively slower start.

Figure 10: Financial progress by intervention field for SO3



SO3 (Return, Reintegration and Countering Illegal Migration) shows a less marked progress compared to SO1 and SO2 (but still relatively higher than other Home Affairs Funds), most probably due to inherent difficulties of return measures, demanding needs in terms of coordination and dependence on the cooperation of third countries.

Figure 11: Financial progress by intervention field for SO4



In the case of SO4 (Solidarity and fair sharing of Responsibility), the high level of progress is clearly influenced by the role played by the allocations related to resettlement and humanitarian admissions, which follow a specific programming cycle. Member States inform the Commission of their intent to participate in resettlement and humanitarian admissions by submitting a voluntary pledge to the Commission during specified periods. The pledges specify the number of persons to be resettled and/or admitted through humanitarian admission. Thus far, three pledging cycles have been conducted (covering the years 2021-2022, 2023, and 2024-2025). The related resources are then regularly allocated to the relevant Member States through amendments to their AMIF programmes, based on the financial progress in the implementation of their previous pledges.

Progress of Output and Result Indicators

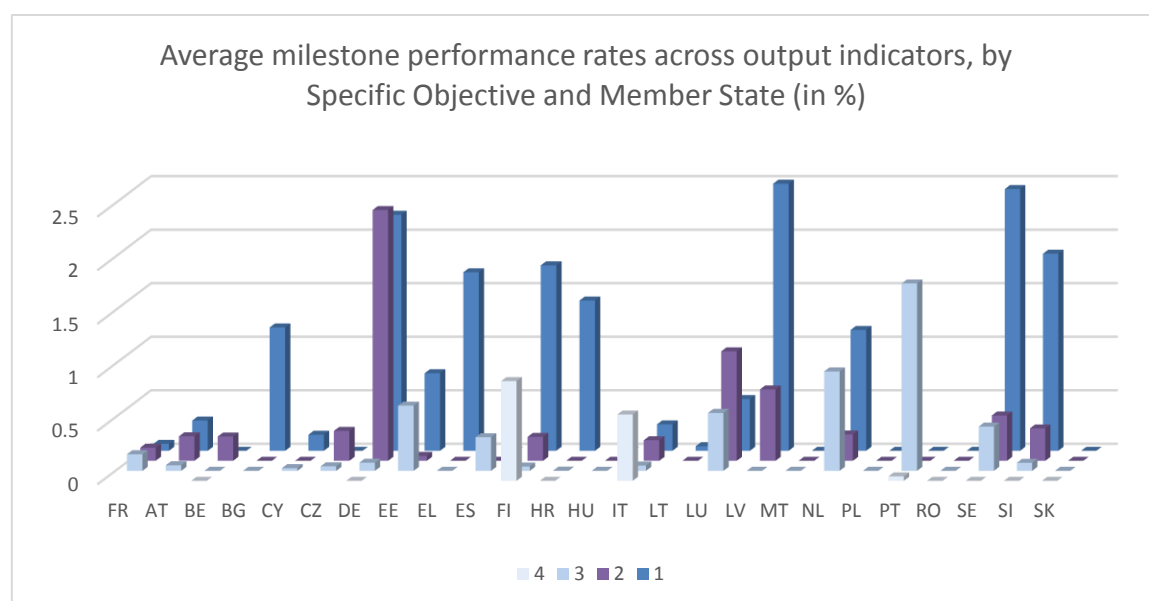
Evidence suggests that, despite some delays at the beginning of the funding period, **Member States are progressing towards the Fund's operational objectives, albeit with notable variations in terms of progress of indicators.** As of 30 June 2024, five Member States (IE, HU, MT, PL, SK) reported no progress across any output and result indicators. At the same time, some Member States reported having exceeded milestone and target values for some indicators by a substantial margin (DE, LV, SE, PT, BE, HR, EL, FI in the case of output indicators, and RO in the case of result indicators).

As regards specifically the **progress of output indicators towards their milestones, by Specific Objective (SO)**, on average SO1 (Common European Asylum System) shows the best performance (72%), followed by SO2 (Legal migration and integration) (25%), SO3 (Return) (21%) and SO4 (Solidarity) (16%). However, as regards SO4 it should be noted that the activities in relation to resettlement, humanitarian admission and relocation, which represent the main components in financial terms under this objective, are not captured by the milestones on output indicators, but rather by the progress towards the targets for result indicators (see below). Progress towards the milestones for output indicators also varies across Member States. The figure below shows average milestone performance rates³⁵ across output indicators, by Specific Objective (1, 2, 3 and 4) for all 25 Member States for which data were available.³⁶

³⁵ The rate of progress of the output indicators compared to the milestones set by the Member States.

³⁶ Progress to milestones for a Member State under a Specific Objective is illustrated as the average of milestone performance rates across output indicators under the Specific Objective, excluding sub-indicators. While this methodology helps to display progress at the aggregate level, it remains prone to outliers. Notably, some Member States reported having exceeded milestone values for some indicators by a substantial margin, with progress rates exceeding 100% (DE, LV, SE, PT, BG, HR, EL, FI, NL). Table 7 of SFC2021 did not contain data on Ireland as of 30 June 2024.

Figure 12: Average milestone performance rates across output indicators



Looking at the **individual output indicators**, on average, the faster progress towards the milestones across Member States was reported under the following output indicators: “Number of participants supported” under SO2, “Number of returnees who received re-integration assistance” under SO3 and “number of participants supported” under SO1, which reached 81%, 62% and 20% respectively. The strong achievements in these areas (for which similar trends were observed in the 2014-2020 programming period) are possibly due to the nature of indicators under SO1 and SO2 (number of persons supported), as well as to contextual elements, such as the sudden increase of persons fleeing the war in Ukraine (not initially foreseen and quantified in the level of the milestones). The average progress rates for the remaining output indicators are below 4%.

When looking at the targets of **result indicators**, across Member States, on average, the highest progress was reported under those belonging to SO4, notably: “Number of applicants for and beneficiaries of international protection transferred from one Member State to another” (under relocation), “Number of persons admitted through humanitarian admission” and “Number of persons resettled”, which reached rates of 34%, 30% and 24% respectively. This trend reflects that fact that the funding of relocation, resettlement and humanitarian admission happens through the Thematic Facility, and the respective target levels are progressively adjusted as long as corresponding financial resources are allocated from the Thematic Facility to the programmes. The average progress towards the targets of the remaining common result indicators is below 9%, with the most performing ones being: “Number of participants who applied for their qualification or skills acquired in a third country to be recognised / assessed”, “Number of returnees who were removed” and “Number of participants who consider the training useful for their work”. When looking at the achievements realised in terms of result indicators, it should also be noted that the result indicators under SO1 and SO2 rely on survey data collected among participants, which may be affected by methodological issues (e.g. non-response rate and time-lag between the end of certain operations and the supply of the corresponding data) leading to under-estimation.

In addition to the late start of implementation of the Fund, several external and internal challenges have impacted the Fund’s progress. Externally, the Russian war of aggression

towards Ukraine led to changing needs. The **COVID-19 pandemic** brought its own challenges in containment of the second wave of COVID-19 and administrative capacity. The results of the targeted survey for Managing Authorities showed that 14 out of 26 (53%) of the Managing Authorities consider the **sudden influx or long-term influx of migrants, in particular due to the Russian war of aggression in the Ukraine as well as COVID-19**, to be the challenges with the greatest negative impact on implementation of the Fund. Member States also faced challenges internally. These included challenges related to internal organisation, a lack of experienced staff with certain expertise, and the regulatory environment within MS.

As demonstrated in the Annual Performance Reports (APRs), Member States developed various remedy strategies to deal with these challenges. Several MS invested in new and flexible reception capacities and strengthening coordination between actors (CZ, LU, NL, PT, SE, SI). Belgium and Ital simplified administrative procedures to enhance the processing of current and new arrivals. Germany increased their staff and enhanced cooperation with the International Organization for Migration.

Progress in the implementation of the Thematic Facility

A total of **675 projects under direct and indirect management (i.e. Union Actions and Emergency Assistance (EMAS))** were signed by June 2024 (of which 19 under EMAS). The highest number of projects were signed in the broad areas of support under “Integration Measures – Employment and Access”, with 166 projects, as well as “Reception Conditions” and in relation to the “EMN activities” with each 65 projects.

Under the **Specific Actions**, a total of seven calls were launched by June 2024, most of which were open and competitive calls (with topics such as “reception at the borders” and “unaccompanied minors”), others targeted to one Member State which would support a project in the interest of all Member States, such as the improvement of tools for language assessment in the field of asylum. The activities covered the areas of “Support to children and persons with special and procedural needs, including victims of trafficking of human beings” as well as “Reception Conditions”.

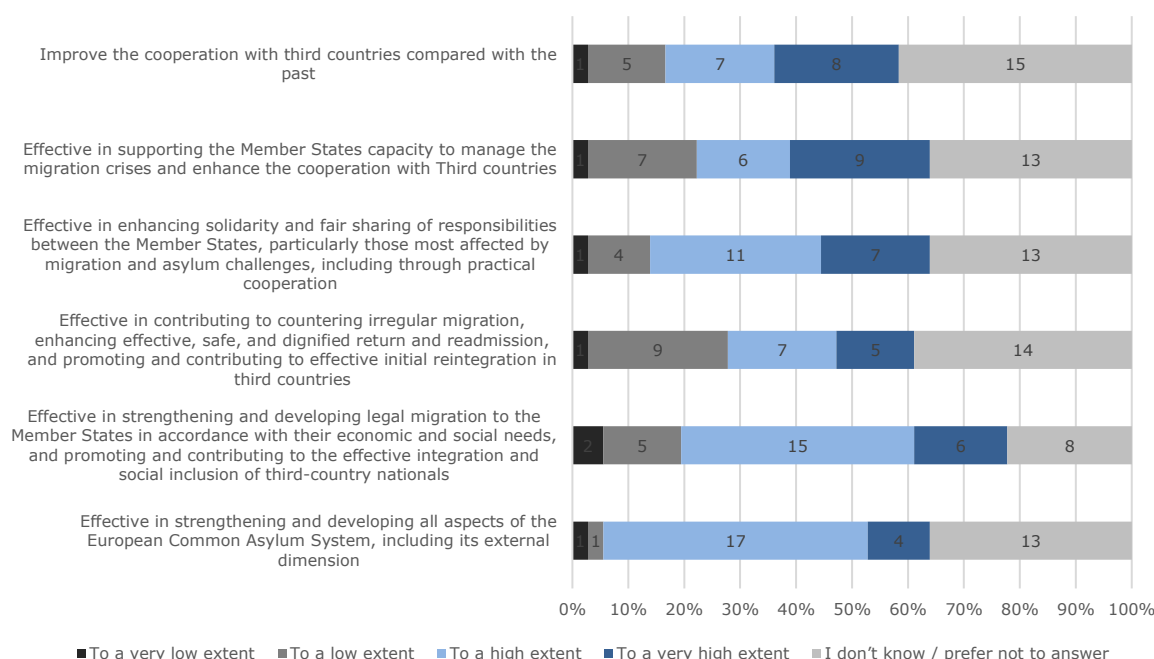
As regards “**Resettlement and Humanitarian Admission**”, by June 2024, 12 Member States committed a total of EUR 730 million in Union contributions (see section 3) and three Member States (DE, FI, SI) reported a total of EUR 14.7 million in Union contributions for **transfers of international protection beneficiaries and applicants** (“Relocation”).

Based on qualitative information retrieved through case studies and targeted surveys, the implementation of both Union Actions and EMAS projects is perceived by stakeholders to be on track according to the envisaged timetable.

As regards more in particular the Union Actions, they are considered particularly effective in strengthening and developing legal migration to the Member States in accordance with their economic and social needs and to contribute to the effective integration and social inclusion of third-country nationals (TCNs):

Figure 13: Results of targeted survey for effectiveness

Results of the survey on the effectiveness of Union Actions (N=36)



Source: Targeted survey with beneficiaries (August – September 2024)

Assessment by the AMIF Managing Authorities

Based on the case studies and dedicated surveys that took place during the evaluation, **the Managing Authorities held an overall positive perception of the effectiveness of the Fund to address its intended objectives**, despite the relatively limited time of implementation.

This is particularly visible in areas such as the AMIF's capacity to provide targeted assistance to third-country nationals throughout the asylum procedure and to persons with special needs within this target population, including minors, across all the areas of support (reception, asylum, integration, return). Stakeholders expressed lower confidence on the effectiveness of more systemic measures such as the development of strategies and innovative approaches across most specific objectives.

Effectiveness of the Monitoring System

Overall, at this stage **the set of data recorded is not yet sufficient to assess the effects and potential future impacts of the Fund**. A closer examination of the Member States involved in the country case studies reveals that for six out of the seven Member States (EL, FR, IT, LT, PL, RO) analysed, no meaningful conclusions can be drawn from the data provided. The insufficiency of data may be attributed to the early stage of implementation, during which not enough information has been collected and reported by the Member States. Nevertheless, the preparatory work undertaken during this evaluation demonstrate the current monitoring system and performance framework has great potential to adequately capture the long-term impacts of the Fund. Therefore, while definitive conclusions cannot be drawn at this time, it is anticipated that as the programmes progress and data collection efforts enhance, a clearer understanding of the Fund's impacts will emerge.

In terms of adequacy of the indicator system, **the common outputs and result indicators laid down in Annex VIII of the AMIF Regulation³⁷ are considered to capture to a certain extent the quantifiable and comparable main achievements of the Fund in line with its intervention logic.** Nonetheless, there is **room for additional indicators** in order to better cover the scope of the AMIF support in a more exhaustive manner.³⁸ Examples include:

1. For SO1, the material aid provided to the target population is considered difficult to be assessed, in lack of a dedicated sub-indicator. Additionally, there is limited opportunity to capture the effects of the funding for services in the area of social inclusion.
2. The effects of the interventions under SO2 are largely captured by the existing indicators. However, there is no counting of members of the host society participating in relevant projects.
3. With regard to SO3, the common output and result indicators reflect the main achievements anticipated by the intervention logic. Nevertheless, Member States are not asked to report the number of developed facilities and support services in third countries for the purpose of reintegration.
4. While the number of resettled and relocated persons are covered by indicators, SO4 has room for improvement in terms of the number of staff provided to other Member States and EUAA.

A number of **improvements are visible with respect to the previous programming period**, notably as regards the development and better coverage of the common indicator system, as well as in terms of information, explanatory documents and tools that have been made available for the users of the monitoring system. This also includes the targeted support that has been provided through dedicated training (including webinars) at the central level, while it is noted that **margins of improvement still exist to support the understanding of monitoring requirements by the final beneficiaries.** In addition, the positive **progress in the use of standard templates is observed**, which for example have helped to streamline reporting requirements on indicators and within APRs.

Still on the positive side, qualitative evidence supports the conclusion that a **reliable electronic exchange system** for recording and storing data between beneficiaries and authorities has been developed and is operating in accordance with the Article 69 (8) CPR.

In addition to that, the 2021-2027 programming period benefits from the **establishment of the Performance Framework defined in the in the CPR**, enabling precise tracking of progress using defined performance indicators, with the obligation for Member States to set milestones and targets. Relevant stakeholders have expressed a range of perceptions regarding the Performance Framework; some recognise it as a substantial improvement to

³⁷ A list of the common indicators is provided in Annex II.

³⁸ However, it should be noted at this point that the existing indicators cannot be changed without a legal amendment to the fund. Consequently, changes or new introductions of indicators would have to be examined in more detail and cannot simply be implemented.

the monitoring and evaluation system, while others see the enhancements as more modest, reflecting a diverse response to the changes implemented.

In its Special Report on the Integration of Third Country Nationals³⁹, the European Court of Auditors (ECA) highlighted that the current performance framework⁴⁰ is an improvement as compared to the one defined in the Common Monitoring and Evaluation Framework for the period 2014-2020⁴¹. As the ECA stated: “This new reporting framework underscores the shortcomings in the reliability of 2014-2020 project reporting”. This point is also confirmed in chapter 3 of the ECA annual report for 2023⁴² under the section dedicated to the Home Affairs Funds and titled “The performance reporting framework improved”: **“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 Home Affairs Funds-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) directly linked to the implementation of the fund. 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.

However, there are **a number of challenges affecting the quality of the monitoring and reporting of AMIF-funded projects**, in part jeopardising the reliability of data reported through the SFC data reporting system.

First, the interviews with Managing Authorities and final beneficiaries revealed a **widespread perception of excessive administrative burden linked with data collection, monitoring and reporting**. Duplication of provision of the same information at different stages and for different administrative purposes is also often recalled by the interviewed stakeholders, albeit in a rather unspecified manner. Overall, the evaluation concludes that it is too early to judge on whether the administrative burden associated to the monitoring and reporting system is proportionate with respect to the benefits in terms of transparency and policy development.

³⁹ [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.

⁴⁰ 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. <http://data.europa.eu/eli/reg/2021/1060/oj>

⁴¹ Commission Delegated Regulation (EU) 2017/207 of 3 October 2016 on the common monitoring and evaluation framework provided for in Regulation (EU) No 514/2014 of the European Parliament and of the Council 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. [EUR-Lex - 02014R0514-20220412 - EN - EUR-Lex](#)

⁴² ECA (2024), Annual reports concerning the 2023 financial year, p. 122, https://www.eca.europa.eu/ECAPublications/AR-2023/AR-2023_EN.pdf

Anecdotal evidence points to the fact that **national IT systems used for monitoring are often not fully integrated**, leading to discrepancies in data reporting. This relates in particular to the fact that the interface between the national and EU monitoring systems is not properly in place.

Similarly, few stakeholders have referred that **the scope of the common indicators is often too broad and fail to capture the specificities of certain projects**, implying that the effects of the operations in certain policy areas may be underestimated. This could be due to the fact that several projects funded cannot be reflected in their full scope and effects, as they do not clearly fall under one of the indicators and their underlying definitions. The preparatory work of the evaluation fails to assess the extent to which this finding is (or could be) overcome by the provision of programme specific indicators. Other stakeholders have referred to **possible gaps in data collection** and reporting.

No firm conclusions are drawn in the APRs on the capacity of the monitoring system to correctly reflect the status of implementation on the ground. This is essentially due to the fact that the early stage of implementation of the programmes has hindered fully-fledged considerations in the APRs on data discrepancies, corrections, and cases of over- or under-reporting.

As regards **target-setting methodologies** the case study analysis reveals clear discrepancies in how the observed nine Member States have defined, calculated, and presented their targets. While the limited number of observed cases does not permit to draw firm conclusions, this variation may suggest that while some Member States have established robust frameworks for target-setting, others may require additional clarity and consistency in their approaches. In addition to that, the Member States show notable differences in terms of completeness, consistency and plausibility in their data reported regarding achievements of targets and milestones.

Concerning **Union Actions** under the Thematic Facility, they utilise a structured yet flexible framework, employing standardised templates and detailed reporting guidelines to ensure high data quality and timely, and accurate financial and narrative reporting.

Effective involvement of the partners

Article 8 of the Common Provision Regulation (CPR) requires the Managing Authorities to set-up a partnership involving the relevant stakeholders of programmes implemented in shared management in all the phases concerning the preparation, implementation and evaluation of those programmes. It also defines specific rules for the composition and functioning of the partnership throughout the programming cycle. In addition, the organisation and implementation of the partnership must follow the European code of conduct on partnership established by Delegated Regulation (EU) No 240/2014⁴³.

While the requirement of involving the partners was not new to the Managing Authorities of the Home Affairs Funds, the CPR and the European Code of Conduct have established a more structured framework and stricter rules for the implementation of the partnership principle, to which they have been confronted for the first time. Overall, **the establishment**

⁴³ Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds. http://data.europa.eu/eli/reg_del/2014/240/oj

of a comprehensive and balanced partnership has been challenging under the Home Affairs Funds.

Despite this generalised trend, the analysis shows that, as regards AMIF **the Member States are endeavouring to involve relevant partners and stakeholders in the programming and implementation of their programmes.** The Member States have paid particular attention to this regarding the development of the programmes and the involvement of the partners in the corresponding Monitoring Committee⁴⁴. Contrary to the case of BMVI and ISF, the AMIF Regulation includes specific provisions concerning the involvement of the partners, (Article 4 of the AMIF Regulation), in addition to the provisions of the CPR. This specific feature, combined with the scope of the AMIF interventions, may have helped to have a smoother application of the partnership principle compared to the other two Home Affairs Funds.

The evaluation findings underpin that **all 26 Member States involved relevant stakeholders within the process of defining the main priorities of their AMIF Programmes.** All Member States involved partners in the preparation of their Programmes by consulting the stakeholders on their needs and problems.

Detailed analysis concerning the actions put in place to enable partners' participation, shows that the Member States have taken **actions going beyond the legal requirements, to ensure the partners participation** throughout all stages of the Fund's cycle. Some examples include:

5. Regular consultation meetings: eight Member States hold regular meetings going beyond those of the Monitoring Committee with key stakeholders, including Civil Society Organisations, local authorities and international organisations, to align the objectives of the Fund with the needs of relevant partners.
6. Bilateral discussion: to address emerging challenges and needs, two Member States have organised targeted bilateral discussions during the preparation phase of their programmes.
7. Public consultations and events: six Member States launched targeted consultation during the programming stage (e.g. sending of questionnaires on draft versions of the programme, organisation of webinars, "Home Affairs Fund Days" and workshops on specific topics such as award of contracts and communication).
8. Collaboration with experts: two Member States have set-up dedicated expert groups to deal with specific topics, e.g. for the screening of submission in relation to Calls for Proposals.

The analysis also shows that all Member States satisfy the requirements of Article 39 of the CPR ("Composition of the Monitoring Committee") and of Article 49 (Responsibilities of the Managing Authorities"), notably as regards transparency rules and publication of information on Calls for Proposals and implemented projects. The interviews conducted support the finding that relevant partners are involved across all stages of the Fund's cycle.

⁴⁴ Article 38 of the CPR: *each Member State shall set up a committee to monitor the implementation of the programme ('monitoring committee'), after consulting the managing authority, within 3 months of the date of notification to the Member State concerned of the decision approving the programme.*

Concerning the effectiveness of the Monitoring Committee, 17 out of 24 (71%) of the Managing Authorities stated that the members of the Monitoring Committee provide recommendations, with 12 (50%) of the respondents perceiving the recommendations as helpful and 5 (21%) sometimes not fully constructive.

Implementation of Horizontal Principles

According to Article 9 of the CPR, on horizontal principles, 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, 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 Funds 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.

Overall, the analysis showed that **all Member States are committed to complying with the horizontal principles**. In addition, it emerged that **the horizontal principles of gender equality, respect of fundamental rights and non-discrimination are promoted more prominently than those related to sustainable development**. This is however in line with the scope and nature of the interventions supported under AMIF. As regards gender mainstreaming, and contrary to BMVI and ISF, all indicators included in Annex VIII of the AMIF Regulation must be reported by the Member States by gender.

The requirements for horizontal principles are considered and reflected in the Member States' Programmes and the Thematic Facility Work Programmes. Beyond that, the Toolkit on the use of EU funds for the integration of people with a migrant background: 2021–2027 programming period provides clear guidelines for authorities and beneficiaries on how to comply with the requirements.

The detailed analysis of the individual Member States regarding the question of whether suitable organisational and procedural arrangements are in place to ensure compliance with the horizontal principles shows that all Member States are committed to complying with the horizontal principles and promote these within their Programmes. The **Member States further use various national mechanisms to ensure this compliance**, such as:⁴⁵

- Informing beneficiaries: Four Member States notify beneficiaries of their obligations to comply with horizontal principles when grant agreements are concluded.
- Training and guidelines: Two Member States organise training sessions to educate beneficiaries on aligning projects with the horizontal principles, while one Member State provides additional guidelines to assist beneficiaries in understanding compliance requirements.

⁴⁵ The national mechanisms are particularly outlined in the Member States' APRs and national mid-term evaluations, though to varying extents between the Member States.

- Reporting requirements: Eleven Member States request beneficiaries to report on compliance or violations in calls for proposals, with non-compliance negatively impacting assessment outcomes.
- Audits and consultations: Six Member States conduct audits and consultations focused on beneficiaries' adherence to horizontal principles.
- On-site compliance checks: Two Member States perform on-site visits to verify compliance with horizontal principles.
- Stakeholder involvement: Three Member States invite key stakeholders to Monitoring Committees to promote equality and prevent discrimination.

However, the national mid-term evaluations indicate that the effectiveness of these measures varies considerably from one Member State to another. Moreover, not all Member States report on the exact arrangements in place and mechanisms applied.

Effectiveness of Communication and Dissemination Activities

Overall, effective communication activities are in place and reaching the target audience, in many cases by using an appropriate mix of communication channels and platforms. The Member States use different communication channels and platforms to reach their target audience, such as information events, social media and dedicated websites. The importance of online presence is becoming increasingly relevant for the Member States and results in widened presence on social media channels. **Minor weaknesses are observed, especially in reaching smaller organisations and Civil Society Organisations.**

Based on the APRs and the mid-term evaluation reports of the AMIF Member States programmes, **18 Member States have put in place a communication strategy.** Some Member States, such as Greece and Germany, have also developed measures to assess the effectiveness of the deployed communication means. Interviewed Managing Authorities consider the advertising and reach of the identified target groups to be appropriate. Compared to the previous funding period 2014-2020, they emphasise significant improvements in visibility, which eventually led to a higher numbers of funding applications. Interviewed beneficiaries generally consider awareness raising appropriate, but some report moderate success in reaching Civil Society Organisations, due to hurdles for small organisations, lack of experience, and bureaucratic language.

4.1.2 Efficiency

Cost-effectiveness

A quantitative assessment of the efficiency of AMIF was hindered by the limited availability of data. Member States and Thematic Facility beneficiaries are not required to collect and report on costs per unit, full-time equivalents (for design, implementation, monitoring, control and audits), technical assistance (disaggregated per year and from preparatory funding, evaluations and communication activities), or gold-plating evidence. They are also not required to report on administrative burden. In addition, data on the efficiency of anti-fraud measures could not be forwarded in a consolidated manner. This is understandable in the overall context of striving towards a reduced administrative burden. Significant efforts to collect the relevant data were made, including through its

methodological design (targeted survey, semi-structured interviews, country case studies), however, faced the challenge that this data in some instances simply does not exist or is too cumbersome to be retrieved on an ad hoc basis.

As a result of these challenges, overall, the collected input was too limited and heterogeneous to conduct a robust evaluative assessment. Where evidence did exist, it was primarily anecdotal and too high-level to use for conclusions. To mitigate these limitations in the context of extensive Fund-specific evaluations, the Commission has launched a dedicated study on the “Assessment of the administrative costs and administrative burden in the management of the common provisions regulation funds 2021-2027” (including the Home Affairs Funds). This study is ongoing and planned to be finalised in the last quarter of 2025. It will provide meaningful insights on the subject.

The findings below thus rely on exemplary and illustrative qualitative evidence from the analysis of desk research. Annual Performance Reports, national mid-term evaluations, interviews, targeted surveys, and thematic and country case studies.

Evidence from EU benchmarking studies and country cases interviews support the conclusion that **AMIF supports a diverse range of cost-effective interventions across asylum, integration and return.**

Language learning, a cornerstone of migrant integration, is recognised for its high cost-effectiveness⁴⁶, as seen in the “Swedish for Immigrants” programme and France’s mandatory language courses, both improving employability and reducing social exclusion. Employment support and vocational training, such as Poland’s ‘Together to Independence’ and Latvia’s entrepreneurship projects, further aid economic independence and reduce reliance on social services. AMIF also funds health care services and civic orientation courses, for example specialised trauma care in Italy and social orientation in Poland, which mitigate long-term costs by fostering early integration. Additionally, AMIF’s voluntary return focus offers a more cost-effective and humane alternative to forced return, promoting economic self-sufficiency and social stability while significantly reducing return-related expenditures.

At the mid-term stage, no firm conclusions can be drawn about the Fund's cost-effectiveness. Although diverse interventions funded by AMIF are deemed cost-effective, only 11% of the budget is spent (however more compared to BMVI and ISF), and progress varies across objectives, with SO1 and SO2 leading (see section 3). The assessment of the cost-effectiveness of the interventions funded by AMIF 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 funding recipients. Data on financial implementation is not connected to the performance indicators the Managing Authorities need to report on. As a result, the cost benefit analysis of the financial investment is rather limited.

While the AMIF supports a wide range of interventions recognised for their cost-effectiveness, the evaluation concludes that **the Fund's potential to further enhance it is**

⁴⁶ For more information, please refer to Bertelsmann Stiftung (2008), Benchmarking Integration in the EU: Analysing the debate on integration indicators and moving it forward, as well as NIEM (2019), The European benchmark for refugee integration: a comparative analysis of the national integration evaluation mechanism in 14 EU countries.

limited by the absence of unit cost calculations, which could provide a more systematic approach to maximising value for money. The analysis of data from 10 selected Member States (Austria, France, Germany, Greece, Italy, Lithuania, Poland, Romania, The Netherlands, and Sweden) shows that relevant benchmarks for key categories of costs under the scope of AMIF are systematically established only in a few Member States. Indeed, the review of 10 target-setting methodologies annexed by these Member States to their Member State Programmes shows that discussions on unit costs are either entirely absent or only minimally addressed. The link between establishing targets and unit costs lies in the fact that unit costs provide a basis for setting realistic targets. By understanding the cost per participant or measure (specific and predetermined amount of funding which is assigned for completing one measurable action or providing one instance of a service), the Member States could more accurately forecast the financial resources needed to achieve specific objectives.

Based on the target-setting methodology analysis carried out, **there is no adequate data available to date to provide reliable evidence that the costs per unit of ongoing operations are in line with, higher than, or below existing benchmarks**⁴⁷. Overall, the evaluation concludes that there is no uniform pattern across the Member States. Rather, the alignment of costs with benchmarks seems to depend on the specific indicators and types of measures. When looking at output indicators, their calculated unit costs are often close to benchmarks, while result indicators have more variation, especially in countries with higher reported costs.

According to the targeted survey responses, Managing Authorities employ a variety of tools to select the most cost-effective projects. Compared to the programming period 2014-2020, during which the selection was largely based on qualitative justifications or prospects from beneficiaries, during the 2021-2027 programming period this increasingly complemented by a comparison with market prices of similar products/services or relevant lessons learned from the previous programming period.

Value for money is considered within the selection criteria for projects under (in-) direct management by the European Commission, evidenced by the list of award criteria of the nine calls for proposals published since 2021. Cost-effectiveness and value for money feature as sub-criteria under “Quality”, which is given 50 points in total, while “Relevance” and its sub-criteria is given 30 points and “Impact” and its sub-criteria is given 20 points. Cost-effectiveness is evaluated on a case-by-case basis with the type of projects in mind since there are differences between for example Union Actions (mostly innovative so challenging to benchmark in terms of efficiency) and EMAS (where the focus is especially to address quickly the emergency situation).

The cost-effectiveness of operations under the Fund can also be assessed through the degree of support Emergency Assistance (EMAS) offers in addressing urgent challenges. According to survey responses, **six out of seven EMAS project participants reported that EMAS met organisational and individual needs to a large or very large extent. The thematic case studies confirm that EMAS is well-suited to tackle emergency needs, offering flexibility for budgetary and project plan adjustments.**

Efficiency of management and control system

⁴⁷ Benchmarks were established based on the [“Study to develop EU level Simplified Cost Options \(SCOs\) and other EU level results-based tools in the programming period 2021-2027”](#), published in July 2023.

The evaluation of the costs to comply with the management and control system shows that the current practices are relatively efficient. **The balance between application efforts and financial resources received is generally proportional, with beneficiaries finding the application processes for the resources programmed by the Commission through EMAS, Specific Actions, and Union Actions relatively efficient**, as evidenced by the thematic case studies conducted during the preparatory work of the evaluation.

Changes in reporting requirements between the AMIF 2014–2020 and 2021–2027 programming periods appear to have increased efficiency by introducing more structured, comprehensive, and technologically integrated processes. Improvements with respect to the previous period include detailed reporting on specific Union priorities, such as milestones, targets, and compliance with fundamental rights, with earlier submission deadlines. In shared management, the addition of mandatory electronic data exchange systems further streamlines the process by ensuring secure, real-time data sharing and reducing administrative burdens through automation. **These enhancements suggest a shift toward a more transparent, accountable, and performance-oriented reporting system, addressing inefficiencies identified in the earlier period.**

While changes have been welcomed by interviewed beneficiaries of shared and in-/direct management projects, the latter **have also pointed out that monitoring and reporting requirements can be particularly burdensome**. Despite these issues, beneficiaries consider the effort required to apply for funding justified by the volume of financing received, making the process overall cost-effective.

Based on the case studies carried out, **there is limited evidence to judge on the proportionality of the costs for the Managing Authorities to comply with the CPR**, although at least two Managing Authorities highlighted that there were high transition costs in particular to adapt the procedures to the Common Provision Regulation⁴⁸ requirements. This could not be quantified. Full Time Equivalent (FTE) data has not been systematically collected during 2021-2027 and targeted survey answers from Member States did not allow for satisfactory quantification: not all participated, and the data are not available in a disaggregated format by year and months. However, it is expected that the administrative burden caused by increased monitoring and reporting will reduce in time, as the administrations and beneficiaries will get accustomed to the new requirements.

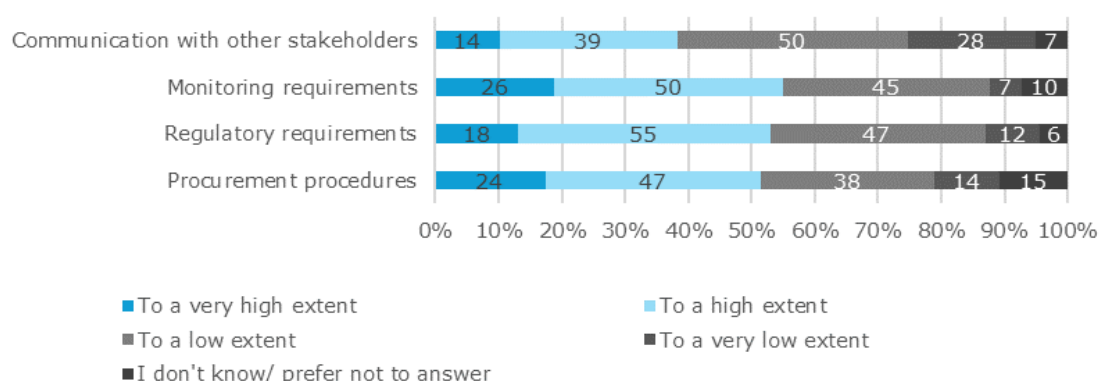
Similarly, **there is limited evidence to evaluate whether the implementation of anti-fraud measures and procedures enhances overall efficiency**. Targeted survey feedback from a low number of Managing Authorities on the average time (man-days) spent preparing for audits and on-site controls, as part of the audit strategy, was inconclusive due to limited or unavailable data.

The use of some simplification measures contributed to increased efficiency, however, considerable challenges remain. The majority of stakeholders, including both beneficiaries and Managing Authorities, consulted through targeted surveys, semi-structured interviews, and case studies, perceive the **administrative burden during project implementation** as substantial, particularly regarding regulatory and monitoring requirements. Procurement procedures also pose difficulties, though to a slightly lesser degree. Communication with other stakeholders is seen as the least challenging, with most respondents indicating low or very low difficulty:

⁴⁸ Based on the country case studies.

Figure 14: Extract from targeted survey on perceived challenges

To what extent were the following aspects perceived as a challenge by your institution / organisation / company in the implementation of the project(s) funded by the MS Programme AMIF? (N=138)

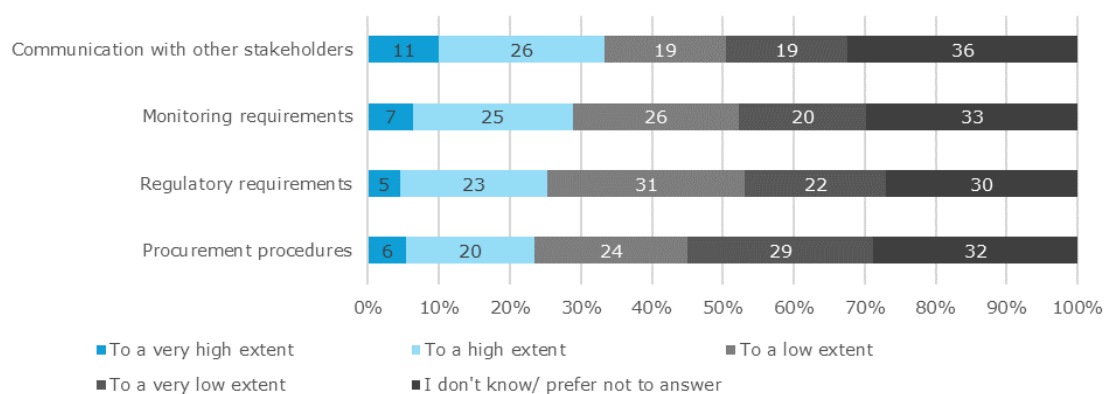


Source: Targeted survey with Beneficiaries (August – September 2024)

The perception by the Fund beneficiaries about the improvements for the 2021-2027 programming period compared to the previous programming period mirrors the results above:

Figure 15: Extract from targeted survey on improvements in 2021-2027

To what extent the following aspects have been improved in the programming period 2021-2027, compared with the previous period? (N=138)



Source: Targeted survey with Beneficiaries (August – September 2024)

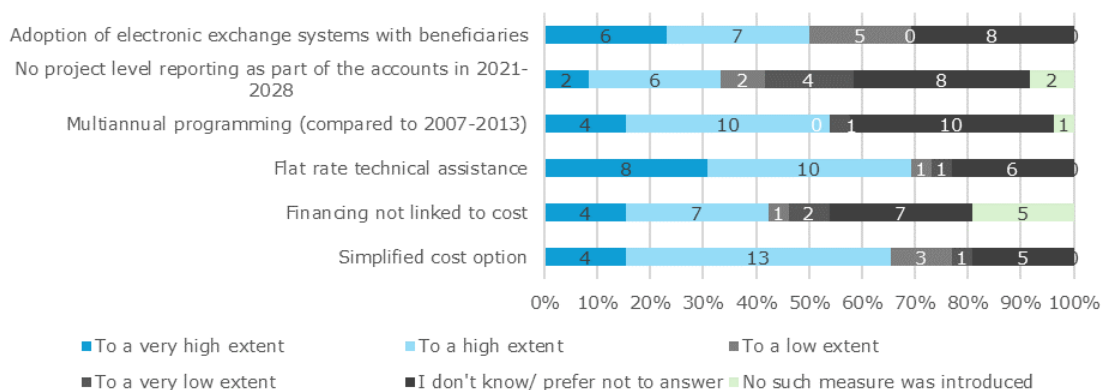
Findings from the literature and document review show that **the efficiency of the management and control system is also influenced by the level of coordination between actors involved in the implementation of the Fund**. In this vein, Luxembourg and Latvia highlighted the importance of improving coordination to reduce administrative burden and ensure coherence in implementing the Fund. **The integration of processes, undertaken by several Member States particularly through digitalisation has been identified as a critical factor in improving the efficiency of the management system.**

Simplified cost options (SCOs) and flat rate technical assistance appear to have had a notable positive impact, with a combined 17 respondents (approximately 12% each) indicating that these measures simplified processes to a "high" or "very high" extent.

Similarly, multiannual programming was recognised by a significant proportion of respondents to the targeted survey (14 in total) as reducing administrative burden to a "high" or "very high" degree. However, "financing not linked to costs" and "No project-level reporting" were less frequently identified as effective measures.

Figure 16: Extract from targeted survey on administrative burden

To what extent have the following changes in AMIF resulted in simplification and/or reduction of administrative burden for the actors involved in the implementation of the fund? (N=26)



Source: Targeted survey with Beneficiaries (August – September 2024)

Compared to the 2014-2020 programming period, the 2021-2027 period mandates more use of SCOs, including thresholds for mandatory application by the Managing Authorities and predefined methods to simplify calculations. The **interview data reveals that simplified cost options have been implemented to a varying degree, but their effectiveness and uptake are mixed**. Some beneficiaries appreciate their potential to reduce the administrative burden, particularly when using flat rates and lump sums, which streamline the reporting process. However, others highlight significant challenges, such as inconsistent application across funding streams and cumbersome preparation requirements. The new IT systems, such as Germany's digital application platform and Poland's ROFED system, have also facilitated simplification, particularly in monitoring and reporting. Despite these improvements, beneficiaries frequently report that the overall administrative workload for AMIF projects remains high compared to national funding. This is compounded by complex rules (including for eligibility), multiple approval layers, and frequent reporting requirements, which limit the efficiency gains from simplified cost options. Overall, the analysis concludes that **while simplified cost options is a promising avenue to increase efficiency in the implementation of AMIF (also confirmed by the national mid-term evaluations), more consistent implementation and clearer guidance are necessary to fully realise their efficiency potential**. In addition, **further simplifications, such as cost catalogues or expanded flat rates, could enhance efficiency**.

There is **limited evidence of** additional constraints beyond EU requirements introduced by national legislation and rules (gold plating) in the six country case studies – except for one Member State. However, interviewed beneficiaries find the administrative burden under direct or indirect management lighter compared to shared management.

In the same way as the other Home Affairs Funds, AMIF applies a flat rate of 6% for Technical Assistance (TA), which can be used for communication, administrative support,

monitoring and control, evaluation, capacity building. An analysis of financial resources allocated to TA in the Member States Programmes shows that **TA is broadly being used to strengthen the management and control system** (supported by the mid-term evaluations in 7 Member States). Due to a lack of quantitative data covering all EU MS, it has not been possible to assess comprehensively whether the 6% flat rate is sufficient, although the consulted stakeholders have highlighted that the available technical assistance is insufficient to cover high personnel costs.

Based on the considerations above, overall, **the management and control system show moderate efficiency, with simplified cost options and flat rate technical assistance helping to reduce administrative burdens compared to the 2014-2020 programming period**. While some beneficiaries benefit from streamlined reporting, others face inconsistent application, unclear methodologies, and high documentation demands. Technical Assistance supports system improvements, though evidence on the impact of anti-fraud measures and gold-plating is limited. Despite progress, administrative burdens and uneven simplification measures indicate room for improvement.

As regards the **scope for further simplification, in addition to expanded simplified cost options, opportunities are also seen in relation to the introduction of electronic exchange data** systems for the communication between project beneficiaries and the Managing Authorities (Article 69(8) CPR), supporting also the systematic transmission of data from Member States to the Commission. The analysis of interview data, mid-term evaluations, and targeted survey results highlights multiple challenges associated with AMIF's electronic data exchange systems across the Member States. Key issues relate to data entry, indicator tracking, and the extraction of relevant data for reporting. **Duplication of data entry presents an additional challenge**, as highlighted in national mid-term evaluations and corroborated by interview data from Germany as well as France. In some cases, AMIF beneficiaries are required to input the same information into both national systems and internal documentation, thereby increasing the administrative workload. This finding aligns with data from the targeted survey, where approximately one-third of respondents indicated that the contribution of electronic systems to reducing administrative burdens was limited.

4.1.3 Coherence

Internal Coherence

“Internal coherence” looks at the degree to which AMIF is coherent (in terms of complementarities, synergies and overlaps) with other initiatives supported under its policy domain, in particular as regards the interaction between the Member States' programmes and the Thematic Facility, or otherwise across the different management modes through which the support is provided.

Overall, the evaluation concludes **that the programming and implementation of operations under the AMIF policy domain are coordinated to a good extent, although this coordination is still inadequately reported by the Member States**, making it difficult to draw comprehensive conclusions.

The Member State Programmes are aligned with Union Actions' priorities, ensuring complementarity. Union Actions and EMAS address additional needs in comparison to the Member State Programmes, thereby creating synergies rather than overlaps.

Overall, stakeholders agree that AMIF instruments are complementary and effectively coordinated, fostering synergies.

According to the analysis, the coherence of the Member States Programmes and the AMIF Thematic Facility, was not dealt with in a comprehensive way in the APRs and mid-term evaluations of the Member States programmes. In fact, only eight Member States (DE, EL, ES, IT, LT, LU, MT, PL) report on the complementarity of the Thematic Facility initiatives and Member States Programmes in their APRs. These eight Member States confirm the complementarity. Beyond that, only 12 Member States (BE, CY, DE, EE, ES, FI, IT, LT, LV, PL, PT, SI) address the complementarity between the Thematic Facility and Member States Programmes in their mid-term evaluations.

For instance, the mid-term evaluation of the programmes of Cyprus emphasises that funding from the Thematic Facility has helped to address additional needs towards changing priorities at national and EU level and evolving challenges arising in the policy area. This premise is supported by the findings of the interviews conducted, which showed overall that the interventions funded by the AMIF Thematic Facility in their respective Member States address important gaps, such as emerging needs and unforeseen challenges (i.e. a rise in the number of unaccompanied minors, the Russian war of aggression against Ukraine) not covered by the funded measures of the Member State Programmes.

Regarding the views of stakeholders, **67% of the Managing Authorities surveyed agree or strongly agree that the instruments of the AMIF (i.e. the Member States Programmes and the Thematic Facility) are complementary**. Likewise, the respondents agree on the fact that the interventions under the Thematic Facility and the Member States programmes are effectively coordinated, which leads to the creation of synergies. The remaining 33% either had no knowledge of it or preferred not to answer, i.e. none of the respondents disagreed about the complementarity between the Member States programmes and the Thematic Facility.

As concerns the coherence between the Fund and current policy agendas at EU and national levels, the findings of the desk research show that coordination and development of synergies are highly necessary. This need is addressed by establishing comprehensive strategic policy frameworks and strengthening coordination mechanisms across different levels. At the EU level, efforts are being made to coordinate the AMIF interventions with action plans and strategies, such as the Action Plan on Integration and Inclusion 2021-2027 and the EU Strategy on Combatting Trafficking in Human Beings 2021-2025. This coordination aims to enhance the coherence and effectiveness of AMIF-funded projects in contributing to overarching EU objectives and addressing key issues in a harmonised manner.

As concerns the situation at the national level, 19 Member States stated in their mid-term evaluations that the measures under the AMIF are coherent with the policy agendas at national level⁴⁹. While some countries go into detail, many simply note the coherence.

Concerning the **cooperation within and between relevant bodies involved in various capacities in the management of the AMIF, or in relation with the Fund, findings**

⁴⁹ As this judgment criteria is not mandated by the AMIF regulation, the omission of similar statements in the other MS mid-term evaluations should simply be understood as the information was not provided.

show that cooperation takes place in most Member States. Information on cooperation is not available for only two Member States (BG, EE).

Both forms of cooperation (within and between authorities) involve coordination efforts between the Member States' authorities and other stakeholders to effectively plan, fund and implement actions. The findings from the analysis of the interviews, programmes and reports show that **cooperation efforts are pursued both within the AMIF Managing Authorities**, to align the various instruments and funded measures, **and between the AMIF Managing Authorities and other authorities and institutions** to align with other funding and to coordinate the necessary measures. In particular, the Thematic Facility Work Programmes foster inter-agency cooperation, for example through transnational cooperation and the involvement of local communities and Civil Society Organisations for more effective integration of persons in need.

Looking at the Member States, it emerges that cooperation is generally considered to be very important. 24 Member States are reporting on established and desired cooperation with other agencies and organisations. Most Member States report on cooperation efforts at national level between the authorities, such as relevant ministries or with responsible municipalities. In addition, 10 Member States report cooperation efforts with relevant EU bodies, offices and authorities. Cooperation with other Member States is mentioned relatively little, by only five Member States. While six Member States report on cooperation efforts with international organisations such as the IOM or UNHCR. However, it must be mentioned that the Member States rarely go into detail about how exactly this cooperation takes place, if not by referring in general terms to the composition of the Monitoring Committee.

In the context of mentioning the cooperation efforts already undertaken, Member States emphasise that they want to intensify their cooperation with the authorities in the country of origin and with non-state actors and seek further cooperation with other Member States. The further pursuit of cooperation with other national authorities, for example to create synergies, as well as internal cooperation within the Monitoring Committee and external cooperation with beneficiaries is also emphasized.

In conclusion, **the coherence between the AMIF and current policy agendas at both EU and national levels is actively pursued through strategic policy frameworks and coordination mechanisms.** Efforts at the EU level aim to enhance the effectiveness of AMIF-funded projects. Most Member States report alignment between AMIF measures and their policy agendas. Cooperation within and between relevant bodies is recurrent, though detailed information on how this cooperation is carried out is often lacking. Overall, while significant efforts are being made, more detailed reporting on cooperation practices and further action to enhance these efforts are needed.

External Coherence

“External coherence” looks at the degree to which there are complementarities, synergies and overlaps with respect to other policy instruments, EU funding instruments (including other Home Affairs Funds) and programmes.

Overall, the findings show that coherence between the support under AMIF and other measures, including the creation of synergies as well as complementarities are clearly pursued by the Member States. The operations supported under the AMIF are coordinated with other Home Affairs Funds, EU funding instruments and programmes at

both EU and national levels through various mechanisms. **Increasing synergies and complementarities between different national and EU funding instruments require a high level of coordination between different authorities and agreement with several stakeholders.**

Coherence with other Home Affairs Funds (ISF and BMVI)

While the Home Affairs Funds cover different themes and policy areas, they do contribute to complementary EU level objectives in the field of migration, border management and security, provide funding to similar types of beneficiaries and funding similar types of activities. These interlinkages require that mechanisms are in place to avoid the funding of overlapping or contradictory activities, and to ensure that synergies are created where relevant.

Robust mechanisms exist at national and EU level to ensure actions implemented through AMIF, BMVI and ISF are complementary and coherent, although this is pursued through different mechanisms and tools across the Member States.

Firstly, the legal framework allows for complementarities and synergies between AMIF and the other Home Affairs Funds in two ways:

As laid out in AMIF Regulation (EU) 2021/1147, recital 32: “In keeping with the principle of efficiency, synergies and consistency should be sought with other Union Funds and overlap between actions should be avoided”.

Transfer of funding: As per Article 26 of the CPR, Member States may request the transfer of up to 5 % of the initial national allocation of each EU funding instrument to any other instrument under direct or indirect management. The table below provides examples of transfers that have been made under shared management at the beginning of the implementation period.

Table 1: Transfers of initial national allocations to other Home Affairs Funds

	Country	Receiving Fund	Amount transferred (EUR)
Transfers from AMIF	Estonia	BMVI	1,112,731
	Portugal	ISF	3,202,366

No transfer from BMVI or ISF to AMIF have taken place. The possibility for transfers between the AMIF and the other CPR funds is described further in the following section on coherence with other EU funding instruments.

At national level, the key mechanism in place to ensure that overlaps are avoided are the Managing Authorities (in doing their selection of funded actions) and the Monitoring Committees. The latter ensures the monitoring of the implementation of the Programme, and supports the Managing Authorities in their implementation efforts. In addition, Member States are obliged to consult and coordinate with DG HOME in relation to projects

under the Member States Programmes planned to be implemented with, or in relation to third countries⁵⁰.

At EU level, overlaps are avoided and synergies between the three Home Affairs Funds are ensured. The Commission maintains an overview of the Thematic Facility Work Programmes and is therefore able to ensure the priorities for the Thematic Facility for each of the Funds do not overlap at programming stage. In addition, as confirmed through the interviews with DG HOME, the Commission has other tools at its disposal to ensure coherence between the funding instruments:

Participation of DG HOME in Monitoring Committee meetings.

Dialogue between DG HOME and Managing Authorities, for example when DG HOME is contacted with a question for clarification, or when programme amendments are submitted.

The possibility to carry out on site visits: DG HOME has a prerogative to carry out on site visits in the Member States to better understand how the funding is being implemented.

Review of information provided to the Commission as part of the responsibilities of Member States under Chapter III of the CPR on Visibility, transparency and communication.

Coherence with other EU funding instruments

Those conclusions are essentially based on qualitative evidence. According to the targeted survey with Managing Authorities, three-quarters (75%) of the respondents consider the AMIF to be complementary with other EU funding instruments (in particular ESF+, ERDF, NDICI). While 21% preferred not to answer, only 4% disagreed with the AMIF being complementary with other EU funding instruments. **The respondents further agree that the Funds under shared management are well coordinated and work together effectively as regards AMIF, ESF+ and the ERDF.** This is in particular because the AMIF shares financial rules and strategic objectives with these Cohesion Policy Funds. The consultations of relevant stakeholders confirms that the Member States are clearly keen to exploit and assess complementarities with other EU funding instruments. All 26 Member States describe existing complementarities and synergies with other Funds or indicate plans to develop them in their Member State Programmes.

In addition to the Home Affairs Funds, it is particularly important to highlight the following Funds due to their complementarities and synergies with the AMIF:

- **ESF+:** The ESF+ is the EU's main instrument for investing in people, focusing on employment, social, education, and skills policies, as well as structural reforms. It emphasises long-term integration measures, particularly in labor market integration and social inclusion of migrants. The ESF+ complements the AMIF in promoting the integration of TCNs and encourages transnational cooperation. Compared to the AMIF, the ESF+ is aimed at follow-up measures that are more geared towards long-term integration. Both funds follow the same financial rules and strategic

⁵⁰ Article 16(11) AMIF Regulation.

objectives. The Commission's services have developed a "Toolkit on the use of EU funds for the integration of people with a migrant background"⁵¹ aiming to assist all relevant stakeholders at European, national, regional and local levels in designing and implementing integration policies targeted at people with a migrant background, through the coordinated use of relevant EU funds in the 2021–2027 programming period (AMIF, ESF+, ERDF, EAFRD, as well as TSI).

- **ERDF:** The ERDF aims to strengthen economic, social, and territorial cohesion in the EU by funding long-term integration initiatives. It supports infrastructure, access to quality and inclusive services in education, employment, housing, social affairs, health, childcare, and culture, and cooperation across borders (under its Interreg strand). While the ERDF and AMIF both promote the integration and social inclusion of TCNs, the ERDF further complements AMIF by facilitating the transition to community-based care and investing in SMEs to create jobs, from which migrants as well as other vulnerable groups can benefit. Both funds follow the same financial rules and strategic objectives, ensuring a cohesive approach across the EU. Member States are also required to describe the complementarity between cohesion policy funds and other CPR funds, including AMIF, in the Partnership Agreements and in the respective cohesion policy programmes.
- **NDICI:** The NDICI is designed to assist third countries in the Neighbourhood, Sub-Saharan Africa, Asia and the Pacific, and the Americas and the Caribbean, particularly those facing significant development challenges. It supports these countries in overcoming long-term developmental issues and aligns with the EU's international commitments, including the 2030 Agenda and the Paris Agreement. The NDICI regulation provides that indicatively 10% of the overall financial envelope for the Instrument should be dedicated to actions supporting management and governance of migration and forced displacement, and to actions addressing the root causes of irregular migration and forced displacement.⁵² The NDICI merges several former EU external financing instruments and coordinates initiatives with Member States and international organisations before funding decisions, rather than through calls for proposals. In contrast, the AMIF targets migration management within the EU. It funds initiatives to ensure a uniform application of EU asylum rules, support legal migration, and facilitate the integration of TCNs. Thus, the NDICI addresses broader developmental challenges in third countries, while the AMIF is dedicated to managing migration and integration within the EU. Nevertheless, both instruments aim to enhance cooperation with third countries on migration management.
- **RRF⁵³:** The RRF is a central element of the EU's NextGenerationEU plan for post-crisis recovery and resilience, supporting the EU's strategy, REPowerEU, to address socio-economic impacts and energy market disruptions due to Russia's

⁵¹ European Commission: Directorate-General for Regional and Urban Policy, *Toolkit on the use of EU funds for the integration of people with a migrant background – 2021–2027 programming period*, Publications Office, 2021, <https://data.europa.eu/doi/10.2776/319860>

⁵² Recital 51 of Regulation (EU) 2021/947 of the European Parliament and of the Council of 9 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe, amending and repealing Decision No 466/2014/EU of the European Parliament and of the Council and repealing Regulation (EU) 2017/1601 of the European Parliament and of the Council and Council Regulation (EC, Euratom) No 480/2009. <http://data.europa.eu/eli/reg/2021/947/oj>

⁵³ Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility. <http://data.europa.eu/eli/reg/2021/241/oj>

invasion of Ukraine. Synergies with the AMIF exist to the extent that the RRF provides broader socio-economic support and infrastructure development to Member States, which consequently improves the overall resilience and integration capacity associated with the AMIF within the EU. However, it is important to note here that the RRF does not cover TCNs. Thus, projects that are eligible for AMIF funding due to their target group cannot apply for RRF funding, as the latter covers different target groups, and vice versa.

Coherence with EU external policy

All the AMIF specific objectives may support actions in the external dimension that represent a continuum from the internal dimension into the external dimension of migration. For example, by supporting legal migration pathways. Article 5(3) of the AMIF Regulation lays out that the Commission and the Member States, together with the European External Action Service must ensure that actions in and in relation to third countries (a) are carried out in synergy and in coherence with other actions outside the Union supported through other Union instruments; (b) 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; (c) focus on measures that are not development-oriented; and (d) serve the interests of internal Union policies and are consistent with activities within the EU.

Under shared management, Member States need to consult the Commission prior to the approval of a project being supported by the AMIF in or in relation to a third country⁵⁴. 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. Regarding the Thematic Facility, coherence is ensured through the interservice consultations with the relevant external action services. Under direct and indirect management, only third countries listed in the Commission's Work Programme are eligible for Union financing ensuring that the actions in which they participate contribute to the achievement of the objectives of the Fund⁵⁵; and funding from the Thematic Facility can only be used to support actions in or in relation to third countries, within the objectives of the Fund⁵⁶. At the reporting and evaluation stages⁵⁷, assessing complementarity between the actions supported under the AMIF and the support provided by other Union funds to actions taken in or in relation to third countries is required.

In this regard, AMIF-funded calls for proposals have been launched under the Migration Partnership Facility (MPF)⁵⁸, 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

⁵⁴ Article 16 (11) of the AMIF Regulation. A formal consultation process does not concern resettlement, humanitarian admission and returns funded through AMIF, nor operations concerning readmission/reintegration of third country nationals in line with Annex III (4) of the AMIF regulation provided that they are not development-oriented, and they do not concern third countries in politically sensitive situations.

⁵⁵ Articles 24(1)(a)(ii) and 24(3) of the AMIF Regulation.

⁵⁶ Article 11(2) of the AMIF Regulation.

⁵⁷ Article 35(2)(c) of the AMIF Regulation and Article 34(4) of the AMIF Regulation, respectively.

⁵⁸ [Home - Migration Partnership Facility](#)

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 INTPA, 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 (MOCADDEM). 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.

In the context of the NDICI, consistency, coherence, synergies and complementarity with other external financing instruments, and with other relevant Union policies and programmes, are particularly sought. The Union and the Member States ensure inclusive consultations with each other at the programming, implementation, monitoring, and evaluation stages as well.⁵⁹ Also, specific rules are laid down on the conditions of receiving contributions from both NDICI and from another Union programme⁶⁰.

Nevertheless, 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 need to further strengthen the link between external and internal priorities of the Union's 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 assistance⁶¹ eligibility.

Mechanisms to ensure external coherence

Based on the analysis of the programmes, national mid-term evaluations and Annual Performance Reports, **22 Member States have put in place mechanisms to coordinate AMIF with other CPR Funds**. Those mechanisms are:

- Coordination meetings with other Funds: observed in 16 Member States,
- Unique Monitoring Committee for all CPR Funds: observed in 2 Member States,

⁵⁹ Article 12, 35 41, 42 of the NDICI Regulation.

⁶⁰ Article 5 of the NDICI Regulation.

⁶¹ Official development assistance eligibility criteria is set by the Organisation for Economic Cooperation and Development.

- Cross-participation in other Funds committees: observed in 11 Member States,
- Appointment of a coordination/working group: observed in 5 Member States.

Good coordination between AMIF, ESF+ and ERDF is happening **in the domain of integration and social inclusion of third country nationals**, as called for in the Action Plan on Integration and Inclusion 2021-2027⁶². On this, the evaluation concludes that overall, **the Member States have put in place the necessary monitoring arrangements to ensure that the activities to be financed are clearly differentiated from one another and do not overlap**. For this purpose, the Member States use, for example, a regular exchange of information or integrate members of the different Funds on the same Monitoring Committee to establish complementarities and synergies.

On the interaction between AMIF and ESF+ in the field of integration, the recent special report by the European Court of Auditors (ECA)⁶³ points out that, during the 2014-2020 programming period, limited coordination between EU Funds was found, especially regarding integration of third-country nationals. This limited coordination between AMIF and ESF hindered the establishment of comprehensive integration pathways and there were no notable examples of seamless transitions from early integration measures funded by AMIF to medium- or long-term support financed by the ESF. In some cases, national funding filled these gaps, but this lack of synergy reduced the overall effectiveness of EU funding mechanisms.

Nonetheless, **better demarcation between AMIF and ESF/ESF+ during the 2021–2027 programming period, has enhanced their complementarity compared to the previous programming period**. AMIF now focuses on early-stage integration activities, such as language training, civic orientation, and pre-departure information campaigns, while ESF+ and ERDF addresses long-term socio-economic inclusion, including access to education, housing, and employment. The Commission also issued targeted guidance to Member States, helping them to plan and define areas of intervention for each Fund to avoid overlaps and enhance continuity. Furthermore, mutual consultations between the Directorates-General managing AMIF and ESF/ESF+ during the programming phase strengthened this alignment.

In April 2022 the Commission issued guidance to the Member States on a comprehensive list of indicative measures which could be supported by the Funds, to maximise the joint impact of the Funds in supporting the Member States dealing with the high number of persons who were fleeing the war in Ukraine. This document was made available to the Member States and provides a very good example of complementary actions between CPR Funds to face challenges for the Union under a common framework and complementary instruments.

In practical terms, some Member States have implemented measures to reduce duplication and improve fund management. For example, Spain introduced integrated calls for project applications that allowed entities to apply for funding from AMIF, ESF, or state budgets

⁶² COM(2020)758 final. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Action Plan on Integration and Inclusion 2021-2027:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0758>

⁶³ **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.

depending on the nature of their activities. This system, combined with mandatory documentation requirements to distinguish funding sources, minimised the risk of double funding while ensuring that diverse integration needs were met efficiently. **These advancements mark a significant step toward leveraging the full potential of EU Funds in supporting the integration of third-country nationals.**

Preliminary results from an ongoing study on “Strategic coordination and financial complementarity of CPR Funds with other EU Instruments”⁶⁴ support the evaluation conclusion about the need for good coordination to enhance synergies and complementarities. However, the study also points to **increased complexity and the administrative burdens of coordinating multiple programmes and Funds such as varying objectives, target groups, and management styles.** The same study also refers to the fact that for some Managing Authorities, the primary **difficulties in implementing synergies among Funds stem from the diverse set of rules governing each Fund,** including the ensuing risk of double funding, and the lack of clear communication and information from the Commission on the possibilities and modalities of implementing synergies between the various Funds and instruments. In particular, the **variance in definitions and procedures between funds** poses challenges and generates additional costs. The study concludes that **the Monitoring Committee can play a vital role in coordinating CPR Funds,** ensuring strategic alignment across EU programmes. Comprising representatives from various Managing Authorities, the diverse composition of Monitoring Committees facilitates robust collaboration and information exchange. This enhances synergy and prevents overlap, significantly influencing the effective implementation and integration of multiple funding streams.

The Home Affairs Funds have only been marginally concerned by the possibility introduced by the CPR to transfer financial resources from or to other CPR funds (i.e. under Cohesion or Fisheries and Maritime policies), and no transfers between the AMIF the other CPR funds has taken place.

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

4.2.1 To what extent is AMIF generating EU added value?

The evidence collected underscores the **AMIF’s role in providing essential support to Member States, extending beyond their individual capacities to address migration and asylum challenges.** Through its scope, scale, and functional contributions, AMIF has not only **enhanced national systems** but also **strengthened the EU’s collective ability to respond to migration dynamics.** This aligns with the broader objective of fostering solidarity, innovation, and shared responsibility across the Union.

The assessment shows that AMIF has played a significant role regarding scope effects in the majority of the supported Member States, specifically in **addressing additional target groups and in introducing new interventions to address emerging needs.** AMIF’s added value is furthermore demonstrated by its visible efforts that enabled a **significant expansion of services, enhancing administrative capacity in managing migration and asylum processes in several Member States.** It was not possible to carry out an extensive analysis of Member States investments under national funds during the course of the evaluation. Nevertheless, the preparatory work undertaken during this evaluation found

⁶⁴ The study has been launched and coordinated by DG REGIO and is expected to be available in 2025.

evidence of AMIF generating EU added value. Overall, AMIF is acting as an essential instrument for implementing EU migration policies.

Expanding the Scope of Services

AMIF has demonstrated **flexibility in addressing additional target groups and adapting to new migration challenges**, such as the influx of unaccompanied minors and Ukrainian refugees, in 19 Member States. Examples include the establishment of temporary shelters in Luxembourg and specialised reception facilities in Italy for unaccompanied minors, showcasing AMIF's flexibility in addressing emerging migration challenges. The Fund has enabled the **introduction of new interventions to meet these emerging needs**. For instance, three Member States (EE, MT, RO) have introduced psychological support services that were previously unavailable. In France, the stakeholder survey involving public authorities, civil society organisations and service providers, revealed that expanding the geographic reach and diversifying services enabled fund recipients to develop new support measures that effectively addressed emerging needs. Moreover, Member States like Finland and Hungary expanded training services and integration programs for Ukrainian refugees, showcasing AMIF's capacity to adapt and provide support in times of crisis. **This expansion in scope of services has also led to improvements in public policy systems and the management of migration-related services**. For example, in Cyprus the AMIF's investment in human resources and project implementation have helped to raise the standard of procedures, not only for short-term projects but in building sustainable expertise networks and infrastructures that continue to provide value even after AMIF funding ends. This has led to an improved capacity to manage migration and integration services effectively.

Scaling Services and Increasing Reach

AMIF has also enabled an **expansion of services and increased the number of end-users** in 11 Member States, particularly those facing migration crises. By significantly scaling up services, Member States such as Finland and Hungary enhanced their training and integration programmes, respectively, to better serve affected populations. This was particularly evident during the Ukrainian refugee crisis, where Member States rapidly expanded their reception and integration capacities. Notable examples include Poland's Foreigners' Integration Centres and hybrid reception facilities in the Netherlands. The box below provides further examples of scale effects that can be observed under AMIF.

Examples of scale effects under AMIF

- Ireland reported that the higher volume of services would not have been possible without AMIF, as it is unclear if national resources alone could have supported investment on new services (e.g. CSO-led projects, mobile health screening activities).
- In Italy, AMIF guaranteed a higher volume of services, including courses, complementary services such as childcare, travel cost reimbursement, mentoring services, and intercultural mediation, as well as the activation of higher-level pathways beyond those normally provided.
- Lithuania benefitted from increased volumes of services such as translation, legal assistance, language training, employment, and counselling. Here, an

interviewed beneficiary flagged that AMIF support for infrastructure projects, particularly to enhance accommodation capacities for third-country nationals, demonstrates the scalability of AMIF's interventions. These projects would not have been financially feasible without AMIF's backing, thus contributing to the higher volume of services available for migrants.

- In Malta, the Fund has scaled up the provision of services, particularly in the areas of healthcare and material aid for asylum seekers (e.g. food, medical supplies, social assistance and allowances). These elements have, according to stakeholders, been crucial in meeting the increased demand for services due to irregular migration flows.
- In the Netherlands, the programme's beneficiaries, including Civil Society Organisations such as Save the Children, have noted an increase in the scale of services offered, especially concerning migrant integration and support for refugees. The volume of resettlement services has also expanded.
- In Romania, the number of asylum seekers receiving accommodation in regional centres reached 10,100 individuals, reflecting a substantial increase in service capacity from 900 to over 2000 accommodating spots. Similarly, Sweden was able to increase the number of asylum reception places and expand integration services.
- In Slovenia, AMIF helped increase the volume of services, particularly legal and social support (e.g. translation services, interpretation, legal services, healthcare) for asylum seekers and third-country nationals. The increased capacity for service provision was crucial in managing the growing number of asylum seekers.

Enhancing Administrative and Functional Capacity

AMIF has strengthened the administrative capacity of Member States in managing migration and asylum processes (CY, DE, EE, FI, FR, HU, LT, LU, MT, PL, RO, SE, SI, SK). This has resulted in enhanced management of asylum seekers and improved integration services, ultimately contributing to the EU's added value in handling migration challenges across Member States. A significant number of Managing Authorities have reported notable progress in their ability to manage asylum systems and integrate migrants, aligning with EU objectives and standards. **The AMIF programme was also reported as useful to improve capacity and coordination within public institutions:** for instance, in Luxembourg AMIF contributed to improving coordination between government bodies, thus enhancing the overall migration and asylum management. In addition, in the Netherlands, national institutions such as the Central Agency for the Reception of Asylum Seekers and the Immigration and Naturalisation Service were able to improve their operational approaches, particularly through the adoption of hybrid reception models and enhanced integration efforts, reflecting significant learning and capacity building. In a similar manner, **AMIF has provided key support for staff training and infrastructure development** in three Member States (PL, RO, SI). Moreover, in Malta, AMIF enabled the Migration Agency and municipalities to expand their capacity to manage reception, integration, and return services, illustrating the direct functional benefits of the programme.

Mitigating Financial Dependency

While AMIF has provided substantial financial support, **there is no strong evidence of Member States being overly dependent on EU funding.** National resources remain a cornerstone of migration and integration efforts, with AMIF serving as a complementary source. Examples include Slovenia and Slovakia, which have implemented measures to sustain integration services with national resources. However, in countries like Ireland and Cyprus, challenges such as reduced philanthropic funding or high migration inflows have led to some degree of reliance on AMIF.

Overall, **AMIF funding is critical for implementing specific projects that might not have been possible without such support.** Managing Authorities underscored AMIF's role in supplementing national budgets, facilitating a unified European response to migration and asylum challenges, and creating targeted integration measures for specific groups.⁶⁵ Without AMIF funding, many beneficiaries of the funding would have had to scale back critical initiatives like migrant integration and language training or resort to fragmented internal resources, significantly reducing efficiency and scope. This would have left gaps in services such as reception capacity, vocational training, and psychosocial support, which alternative funding could not easily address, especially during EU migratory emergencies.

According to the AMIF beneficiaries, **the absence of European funding during the 2021–2027 programming period would pose significant challenges.** Among the surveyed beneficiaries, 88% (22 respondents) indicated that they would have faced difficulties in implementing projects funded by EMAS under national funding.⁶⁶

Furthermore, AMIF funding has been vital for **fostering multidisciplinary networks** crucial for knowledge-sharing and integrated support for third-country nationals. Five beneficiaries highlighted the challenge of establishing such networks without EU funding, noting that relying solely on national budgets would have slowed these processes and jeopardized the sustainability of long-term projects, particularly in areas like unaccompanied minors' reception and temporary protection measures.⁶⁷

Despite this, AMIF is seen as a complementary rather than the unique source of funding. **Member States consistently demonstrate efforts to combine AMIF with national resources, ensuring services are not entirely dependent on EU support.** For instance, Malta utilises national resources for core activities, while AMIF supplements these efforts to secure material aid and additional services without creating dependency. Similarly, Poland integrates national initiatives, supported by mechanisms like the State Fund for War Refugees and Border Guard-financed programs, ensuring that EU funding complements rather than replacing national efforts.

Some Member States have proactively reduced dependency on EU Funds by sustaining key services through national resources. Slovenia has maintained long-term integration services with its budget, ensuring balanced investment. Slovakia, leveraging resources from its Ministry of Labour and Social Affairs, collaborates with AMIF to deliver social services and integration support. Interviews with Civil Society Organisations in these countries stressed the importance of both short and long-term solutions for

⁶⁵ Interviews with four Managing Authorities.

⁶⁶ Targeted survey with beneficiaries.

⁶⁷ Ibid.

empowerment, such as civic engagement, entrepreneurship, and professional networking, to mitigate reliance on external funding.

However, **challenges persist in certain countries**. Ireland faces increasing dependence on AMIF due to a decline in philanthropic funding, making EU support essential for maintaining critical services. Similarly, Cyprus heavily relies on AMIF to manage capacity-building efforts, mainly due to its particular situation, as Cyprus receives the highest proportional migrant influx in the EU, overwhelming national reception mechanisms.

Ultimately, **while AMIF funding has been instrumental in enhancing migration management and integration, it is not the sole driver. National resources continue to play a pivotal role, with EU funding acting as a significant enabler for addressing migration challenges at both national and EU levels.**

Addressing High-Value EU Priorities through the Thematic Facility

The AMIF Thematic Facility, particularly through Specific Action projects and the European Migration Network (EMN), has focused on EU-wide priorities such as improving reception conditions, psychological support, and migration management. These initiatives align with EU standards and policies, showcasing the added value of AMIF in achieving common European responses to migration and asylum challenges.

For instance, **the Thematic Facility has been essential in delivering integration and resettlement services**, contributing to broader Union goals of managing migration flows and integrating third-country nationals within the EU. Projects aimed at improving reception conditions, psychosocial support, and humane treatment were aligned with EU-wide standards (ES, MT, NL, PL, RO, SE). In Poland, these efforts strengthened asylum infrastructure and aligned with EU objectives, while in Hungary, they allowed beneficiaries to legally reside in the EU while acquiring skills for labour market integration.

Furthermore, **Thematic Facility funding has targeted vulnerable groups**, reinforcing high Union added value. For example, initiatives focusing on unaccompanied minors and refugees from conflict zones showcased a strong commitment to EU priorities, such as temporary protection and values of solidarity and humanitarian assistance, particularly relevant during the Ukrainian refugee crisis (IT, LU, SK, SE). In Italy, Thematic Facility support provided essential services for vulnerable children in municipalities, ensuring critical aid that would otherwise not have been guaranteed without EU funding.

Specific Action projects, assessed within the respective thematic case study, clearly demonstrate EU added value. These projects complement national efforts by addressing immediate needs that Member States alone could not meet, contributing to EU-wide migration goals of harmonizing systems across Member States and offering tailored solutions to specific challenges. For example, the European Return and Reintegration Network project established an EU structural intervention programme for providing reintegration services and support that did not exist previously, and which will be continued by Frontex due to the success of the original project.

To conclude, the analysis shows that **AMIF has generated substantial EU added value across all Member States**. With AMIF resources 19 Member States were able to develop new interventions and address new target groups, thereby generating **scope effects**, and

enhancing the overall response to developments in migration. AMIF implementation has also generated **scale effects** in 11 Member States, as it enabled the expansion of services and end-users reached. In particular, in response to the influx of Ukrainian refugees that necessitated certain Member States quickly scale up their service provision to meet the heightened demand. AMIF implementation also **enhanced and/or increased the administrative capacity to manage migration and asylum processes** (e.g. through improved capacity and coordination, provision of trainings, infrastructure development, fostering of new partnerships) in 14 Member States. Overall, although AMIF funding is indeed pivotal for Member States, except for two Member States, all the others showcase **no systematic dependency on EU funding**. Finally, the additional **support provided by the Thematic Facility (e.g. through Specific Actions and EMAS) has successfully addressed priorities with a high Union added value**, while also supporting Member States.

4.3. Is the intervention still relevant?

The relevance criterion assesses whether AMIF addresses the existing policy needs at the time of adoption and to what extent it is still relevant to address the stakeholders' current needs and problems. Furthermore, it tackles the question of the Fund's flexibility in the face of changing circumstances. The relevance of the intervention was assessed by using evidence from various desk sources such as Member State Programmes and national mid-term evaluations, as well as field sources such as interviews, surveys, and case studies.

To what extent did AMIF address the evolving needs?

The main needs of the intervention have been identified by “The Annual Reports of Migration and Asylum”⁶⁸ published by the European Migration Network between 2019 and 2023, as the need to:

- strengthen the management of asylum procedures due to the increase in the number of asylum applications;
- foster socio-economic integration of migrants, notably labour market integration, including language acquisition and education;
- improve assistance of protection measures for unaccompanied minors due to the high number of migrant children;
- address the needs of other relevant vulnerable groups of migrants (i.e. victims of trafficking, women, LGBTQI);
- improve return and readmission systems as well as reception capacity due to the higher number of irregular border crossings;
- further enhance migration management and the capacity of national reception systems due to the additional strain caused by the large inflows of people fleeing the war in Ukraine.

⁶⁸ The Annual Reports of Migration and Asylum are produced by the European Migration Network. Available at: [EMN annual reports - European Commission](#).

These reflected growing trends at the time of Member States' AMIF programme adoptions as regards number of asylum applications, number of first residence permits and number of resettled persons in the EU. Indeed, after COVID-19 restrictions started being lifted and applications for international protection started increasing again in 2021, bringing the numbers back to the 2018 levels. This increase put pressure on Member States' reception and asylum systems. In a similar way, the increased number of residence permits issued by Member States in 2021 highlighted the need to strengthen the adoption of strong integration measures. Contrarily, the effectiveness of returns of the 27 Member States has seen a substantial decline in 2019 and 2020, dropping from almost 45% of average effectiveness to 35% whereas 2021 was marked by a relative increase, going up to approximately 38% effectiveness⁶⁹.

These evolving needs shaping the volatile context of migration and asylum are aligned with the specific needs defined in the intervention logic of AMIF 2021-2027 programming period. In fact, **none of the evidence collected as part of the stakeholder consultation indicated that the intervention logic is not relevant anymore.**

AMIF's relevance at the time of the Member States' programme approval

Table 1 in Annex II demonstrates that, overall, **Member States incorporated measures addressing both the evolving migration context and the specific needs outlined in the intervention logic at the time their programmes were adopted.**

Targeted surveys involving beneficiaries, national authorities, Managing Authorities, and Civil Society Organisations provided generally **positive feedback on the proportional allocation of resources to identified needs**. However, some stakeholders noted that insufficient resources limited the ability to address specific needs of certain target groups, such as unaccompanied minors requiring integration and education services.

The box below shows key challenges gathered from three national mid-term evaluations:

⁶⁹ Eurostat (2024), Third country nationals ordered to leave - annual data (rounded), available at: https://ec.europa.eu/eurostat/databrowser/view/migr_eiord_custom_13558582/default/table?lang=en. Eurostat (2024), Third country nationals returned following an order to leave - annual data, available at: https://ec.europa.eu/eurostat/databrowser/view/migr_eirtn_custom_13557630/default/table?lang=en

Challenges in the proportionality of milestones and targets that prevent a full coverage of evolving needs

- In **Greece**, there was a growing demand and use of national resources to cover emerging needs, which revealed a certain rigidity in diverting existing resources while still satisfying the initially established milestones and targets.
- In **Romania**, whilst overall allocation proved to be aligned with identified priority needs, there were calls for proposals for which no applications were submitted, indicating potential mismatches between funding availability and stakeholder readiness to use them, which in the end might affect an effective response to ongoing and emerging challenges.
- In **Estonia**, bureaucratic challenges and financial constraints hindered overall capacity to scale up and adjust the interventions in response to crises such as the Ukrainian refugee influx.

In conclusion, during the approval phase of Member States' programmes, AMIF allocations for the 2021–2027 programming period were relatively well-aligned with evolving needs. Nevertheless, limitations were noted in addressing the specific needs of vulnerable groups (e.g., unaccompanied minors' integration services) and in overcoming bureaucratic and procedural barriers to effectively respond to emerging challenges.

AMIF's relevance during its implementation

Overall, key measures planned at the national level proved to be suitable for addressing evolving needs during programme implementation, particularly in response to crises such the influx of Ukrainian refugees as reported in most of the Member States' mid-term evaluations (15 Member States).

In their mid-term evaluations, Bulgaria and Germany reported on the strategies they developed to ensure AMIF resources are allocated to priority areas and address the most pressing migration challenges during programme implementation to maximise the impact of the Fund. In Bulgaria, priority areas include enhancing asylum processing systems and expanding integration services. The strategy ensured these areas, which remain important due to global conflicts that drive asylum seekers toward the country, received the largest share of AMIF funding. In Germany, a flexible approach to resource allocation allows for responsive resource allocation according to shifts in migration policy and migration flows. The needs are regularly evaluated based on migration data and stakeholder input, and ensures pressing needs are consistently funded.

The correct identification of stakeholders proved effective to engage a large spectrum of actors, in line with the multi-dimensionality of the Fund's objectives, and to establish an efficient partnership, in line with the objectives outlined in the legal basis.

Indeed, **case studies show that AMIF's capacity to address evolving needs is further enhanced by the fact that stakeholders are correctly identified.** The case studies show that actors involved in AMIF's implementation have expertise in all relevant fields such as irregular migration, asylum processes and reception facilities, among others. The variety

of perspectives of actors involved in the implementation process shows that relevant needs were considered during programme implementation.

A key mechanism that contributed to ensure the Fund's identification and response to priority needs is the effective partnership with national stakeholders who were able to provide inputs on the evolving needs using public consultations for example. The box below outlines key examples of mechanisms adopted to identify relevant stakeholders in the Member States.

Identification of national stakeholders who can provide inputs on evolving needs in the Member States

- **Finland:** To facilitate networking and enable partnerships, the Managing Authority organises events and training sessions targeted at relevant national stakeholders, with a view to engage them during the implementation of the Fund and gather useful feedback to adapt programme implementation to evolving needs. The involvement of national stakeholders is facilitated by the use of an electronic tool for project management, which is accessible by all programme stakeholders and other interested parties, enabling structured cooperation between them and the Managing Authority.
- **France:** In 2021, France adopted a plan to strengthen the management of the vulnerabilities of asylum seekers and refugees, following a broad consultation involving health and mental health stakeholders (central administrations of the Ministry of Health, regional health agencies, carers, etc.), operators of the national reception system and specialised Civil Society Organisations.
- **Italy:** During the current programming period, Italy established the so-called "Control Room", serving as a permanent coordination mechanism among stakeholders responsible for the implementation of the various interventions covered in the Member State Programme. Additional partners may join if needed. The Control Room can meet regularly or on a need-basis, allowing for quick detection and analysis of any contextual changes that might require adjustments to the Member State Programme. Moreover, Italy set up three Technical Groups for asylum, integration, and repatriation, which include immigration management officials and the National Statistic Office with a view to share ongoing updates on thematic needs and agree on any necessary corrective measures. Two more mechanisms for identifying contextual shifts and adapting the MS Programme accordingly are the Permanent Table, composed of foreign communities and relevant Civil Society Organisations, and the Thematic Consultative Tables, which involve various national stakeholders such as regions, universities, and humanitarian corridor entities, promoting active civil society participation. Lastly, an independent evaluator is responsible for regularly analysing contextual changes and update the needs analysis, and to suggest recommendations towards addressing new and changing circumstances.

Lastly, the Thematic Facility Work Programmes have demonstrated a clear focus on addressing key priority needs and target groups, including asylum seekers, third-country nationals under international protection, vulnerable children,

unaccompanied minors, and victims of trafficking of human beings. The Thematic Facility instruments have proven effective to support key needs and target groups that were not fully covered by the Member States programmes.

In Malta, resources from the Thematic Facility helped cover the key needs of asylum seekers and unaccompanied minors (i.e. medical supplies, food, psychological assistance). In other Member States (LT, PL, RO), resources from the Thematic Facility helped strengthen national reception systems. Overall, the thematic case studies on Union Actions, Specific Actions and EMAS demonstrate that these instruments were key to supporting Member States with evolving challenges and needs that were not fully covered through AMIF funding allocated to Member State programmes.

To what extent can AMIF adapt to the evolving needs?

Overall, AMIF can largely adapt to evolving needs. This was stressed by twelve Member States in their national mid-term evaluation of the AMIF as they highlighted AMIF's ability to adapt to new developments in migration flows and TCNs' needs (AT, DE, IE, IT, LU, MT, NL, PL, RO, SE, SI, SK). Several factors contribute to the Fund's ability to adapt to new and emerging circumstances.

Needs assessment

Firstly, all Member States perform a **needs assessment** before preparing their programme, and some clearly state in their national mid-term evaluations that this is regularly updated. Evidence from the survey targeted at Managing Authorities indicates that needs assessment and the Member State programmes' strategy were defined based on consultations with relevant stakeholders (AT, BE, BG, CZ, HR, IT, PT, SI), in some cases also involving regional offices and international bodies such as UNHCR,⁷⁰ and/or defined based on a SWOT analysis⁷¹ (or equivalent) analysis (BE, DE, EE, LT, RO). The box below provides examples of needs assessments performed across the Member States.

Overview of needs assessments performed across the Member States

- **Finland** performs a needs assessment during the preparation phase of the AMIF programme, but there is very limited flexibility in adapting/updating it vis-a-vis evolving external circumstances.
- **France** performs a needs assessment at the beginning of the programming period, but there is no evidence that this assessment is regularly updated beyond the initial programming phase, which could limit the programme's ability to address evolving needs effectively.
- In **Germany**, the programme incorporates the role of the monitoring committee to assess needs and make necessary adjustments.
- Similarly, **Bulgaria** and **Czech Republic** carried out initial needs assessments based on statistical data and thematic areas, focusing on the most significant threats and gaps. However, the available information does not clarify whether these

⁷⁰ Interview with four Managing Authorities. Interview with one beneficiary.

⁷¹ A SWOT analysis identifies the strengths, weaknesses, opportunities and threats of a project, programme, organisation, etc.

assessments have been regularly updated, relying more on baseline analyses without systematic adjustments for new developments.

- **Hungary** recognises that the initial needs assessment requires updates, yet there is no evidence that this is taking place systematically.
- **Luxembourg:** The Managing Authority and the National Reception Office (ONA) conducted rapid assessments in response to the Ukrainian refugee crisis, which allowed them to update their programmes swiftly and increase temporary housing capacity by opening 11 emergency shelters in early 2022.

The role of the monitoring committee

The Monitoring Committee plays a key role in ensuring timely input on evolving needs and facilitating programme adjustments, ensuring that both immediate and long-term migration challenges are addressed.

The lack of a regular update to the needs assessment might undermine the capacity of the Member States' programmes to adapt to evolving needs, but the Managing Authorities can also benefit from the efficient stakeholder identification and hence receive timely inputs through other ways. There is indeed evidence from most Member States that the management of the Fund entails a partnership approach based on the involvement of relevant national stakeholders from the design to the implementation and monitoring phases of the Fund (CY, CZ, DE, EE, EL, ES, FR, IT, LU, MT, NL, PL, SE, SI, SK).

Examples of involvement of the Monitoring Committee across the Member States

- In **Finland**, the AMIF Monitoring Committee is a comprehensive body, including local administrations and public authorities, as well as organisational actors. This broad membership ensures that diverse backgrounds and perspectives are taken into account, thus facilitating comprehensive adjustments when needed.
- In **Malta**, the Monitoring Committee provided timely feedback on the possibility to amend the Maltese AMIF programme in line with evolving needs, although there is room for improving communication and feedback mechanisms.
- In the **Netherlands**, regular meetings coordinated by the Ministry of Justice and Security with the Monitoring Committee helped gather insights from stakeholders on the necessity to modify the Dutch AMIF programme to cover evolving needs, though some have noted the need for more proactive and frequent communication, especially during delays in the application process.
- In **Romania**, the Monitoring Committee, with representatives from government bodies, Civil Society Organisations, and international organisations such as UNHCR, met regularly to review programme progress and adapt it to emerging migration challenges, ensuring responsiveness to changing conditions.
- In **Slovakia**, the Monitoring Committee, which includes actors such as the Ministry of Labour and Social Affairs and local Civil Society Organisations, provided

continuous input during the Ukrainian crisis, allowing the government to quickly adapt the Slovakia's AMIF programme to provide emergency housing and services.

AMIF's flexibility

AMIF has demonstrated significant flexibility in adapting to the evolving needs of Member States. Article 24(5) of the Common Provision Regulation, allows Member States to transfer up to 15% of the initial allocation of a priority to another priority within the same Fund during the programming period, without requiring the approval of an amendment by the Commission. This mechanism has eased adjustments of Member State Programmes in response to migration-related challenges and external shocks.⁷²

Notably, most of the Managing Authorities consulted highlighted how AMIF's flexibility enables the relocation of funds and the **adaption of Member State programmes to respond to new challenges**, such as the refugee crisis stemming from the Russian war of aggression against Ukraine and the related increased service demand, or the need to expand the number of municipalities covered.⁷³ Overall, there is evidence for eleven Member States (AT, CY, DE, EE, EL, ES, FI, FR, NL, RO, SI) that flexibility mechanisms as per Article 24 (5) of the Common Provision Regulation allowed Member States to introduce non-substantial changes to their Member State programmes.

Several Member States turned to the **Thematic Facility to respond to newly emerging needs and benefitted from the flexibility** offered by it, for instance in managing the migratory wave from Ukraine and the management of unexpected inflow of refugees and needs for resettlement (speeding up procedures and enhancing infrastructure, such as housing and healthcare) (AT, CZ, DE, EL, ES, IE, IT, LU, MT, NL, RO, SE, SI, SK). For instance, in Malta, the Thematic Facility was used to address emerging needs, particularly in providing material aid and healthcare services to newly arrived asylum seekers. Indeed, different types of actions such as Union Actions, EMAS and Specific Action financed through the Thematic Facility have been flexibly used by the Member States to address evolving needs. Notably, the "Safe Hut" Union Action, which focuses on creating safe spaces for women and girls to empower them and provide support against gender-based violence and human trafficking, was flexible enough to enable project partners in Lithuania and Romania to reallocate budget to accommodate the influx of migrant women from Ukraine.

Mechanisms facilitating financial flexibility

- **Reallocation of Resources:** examples from Member States show how flexibility mechanisms enabled non-substantial changes in budgets to accommodate emerging needs:
 - **Germany:** Budget readjustments within Germany's AMIF programme increased funding for SO1 by around €53 million to support Ukrainian refugees, while reducing SO3 and SO4 funding.

⁷² Interview with six Managing Authorities

⁷³ Interview with six Managing Authorities.

- **Poland:** funds were shifted to enhance reception capacities and support for Ukrainian nationals.
- **Romania:** Resources were reallocated to address the resettlement of Ukrainian refugees under solidarity objectives.
- **Slovenia:** Flexibility was demonstrated through reallocations of up to 15% between types of actions in the same specific objective.

Administrative and Procedural Challenges

Despite its strengths, certain barriers have limited AMIF's full adaptability:

- **Administrative Hurdles:** Bureaucratic delays, particularly when requiring Commission approval, are claimed to have slowed Programme adjustments in some Member States (e.g., Bulgaria, Czech Republic, Estonia, France, Malta, and Poland).
- **Procurement Procedures:** Challenges in procurement processes hindered timely project implementation, with notable issues in countries like Luxembourg, Malta, and the Netherlands. For example:
 - Luxembourg's centralised procurement limited project adaptability, especially for large-scale infrastructure projects.
 - Poland faced early-stage difficulties with the CST2021 administrative system, increasing administrative burdens,
 - Malta experienced significant delays due to lengthy procurement processes.

The Pact on Migration and Asylum

The recently adopted Pact on Migration and Asylum, consisting of a legislative package embedding nine Regulations⁷⁴, is beyond the scope of this evaluation. Nonetheless it is clear that the scope of AMIF largely covers the activities underpinned by the Pact. The Member States have developed National Implementation Plans ⁷⁵in accordance with Article 86 of the Asylum Migration Management Regulation⁷⁷ pointing to the different elements of their asylum and migration systems to be further developed in view of ensuring full preparedness for the Pact implementation. While the scope of the current AMIF is considered to be relevant to address those needs, the Commission services have clarified

⁷⁴ [Pact on Migration and Asylum - European Commission](#)

⁷⁵ Regulation (EU) 2024/1351 of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013. Article 86, 'Transitional Provisions': each Member State shall, with the support of the Commission and relevant Union bodies, offices and agencies, establish a national implementation plan setting out the actions and the timeline for their implementation. Each Member State shall complete the implementation of its plan by 1 July 2026.

⁷⁶ Article 86, 'Transitional Provisions': each Member State shall, with the support of the Commission and relevant Union bodies, offices and agencies, establish a national implementation plan setting out the actions and the timeline for their implementation. Each Member State shall complete the implementation of its plan by 1 July 2026.

⁷⁷ Each Member State shall, with the support of the Commission and relevant Union bodies, offices and agencies, establish a national implementation plan setting out the actions and the timeline for their implementation. Each Member State shall complete the implementation of its plan by 1 July 2026.

to the Member States on several occasions that national funds will also be necessary to comply with the new *acquis*.

To conclude, **AMIF's flexibility mechanisms**, particularly resource reallocation and the Thematic Facility, **have enabled Member States to adapt to evolving migration needs effectively**. While AMIF has mechanisms for flexibility, the **needs assessments carried out at the start of the programming period to support the AMIF programmes' preparation are not systematically updated during implementation**. Feedback on evolving needs primarily comes from stakeholders via Monitoring Committees, rather than through a structured process. However, **administrative and procedural barriers, especially in procurement processes, pose challenges to the swift adaptation of the AMIF programmes**. To enhance responsiveness, improving procurement frameworks and systematically updating needs assessments could further strengthen AMIF's capacity to address emerging challenges.

5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

5.1. Conclusions

5.1.1 Effectiveness

Considering the relatively early stage in the implementation of the Fund, the effectiveness criterion has been mainly applied to assess the processes and mechanisms within the Fund and how they function to allow adequate and timely progress towards the achievement of the objectives, rather than providing a final assessment of the actual levels of achievement of the objectives.

Following an initial delay in the start of implementation, AMIF programmes seem to have reached cruise speed, with an implementation rate of 46% and absorption rate of 11% (the highest rate of among the CPR Funds).

Financial progress, observed through the absorption rate, appears particularly evident under Specific Objective (SO) 1 (in relation to the development of the Common European Asylum System) and SO2 (focusing on promoting legal migration, integration and social inclusion of third-country nationals). SO3 (countering illegal migration, and enhancing return and readmission of irregular third-country nationals) shows a less marked progress, most probably due to inherent difficulties of the return measures, demanding needs in terms of coordination and high dependence on the cooperation of third countries. SO4 (solidarity measures, such resettlement, humanitarian admissions and relocation) is essentially fed by allocations transferred from the Thematic Facility, based on pledges or number of persons effectively relocated. This explains the high level of execution observed for this SO.

When looking at physical progress of output and result indicators against their respective milestones and target levels, the evaluation concludes that Member States are progressing towards the Fund operational objectives, albeit with notable variations in terms of speed and levels of achievements.

Under SO1 (Common European Asylum System), the analysis shows strong progress in terms of the number of participants supported. Nine Member States (LV, SE, DE, SI, FI, EL, HR, BG, NL) report average milestone performance rates across SO1 output indicators

exceeding 100%, with an overall average across Member States of 72%. However, nine other Member States (BE, CZ, ES, HU, MT, PL, PT, RO, SK) reported no progress in SO1.

For SO2 (Legal migration and integration), substantial progress has been made for the number of participants supported. Germany (234%), Luxembourg (102%) and Latvia (67%) have achieved the highest average milestone performance rates across output indicators under SO2. Eleven Member States (BG, EL, ES, HR, HU, LT, MT, PL, PT, RO, SK) have achieved average milestone performance rates of 0%.

Under SO3 (Return), the strongest progress across Member States was made under the indicator "Number of returnees who received re-integration assistance" (62% on average). Portugal (175%), the Netherlands (93%) and Estonia (61%) have achieved the highest average milestone performance rates across output indicators under SO3, with the overall average across Member States being 21%. At the same time, ten Member States (BE, BG, EL, HR, HU, LV, MT, PL, RO, SK) have achieved average milestone performance rates of 0% and Lithuania has reported no data on progress of output indicators.

For SO4 (Solidarity), significant progress towards result indicators across Member States has been reported for the "Number of applicants for and beneficiaries of international protection transferred from one Member State to another" (34%), "Number of persons admitted through humanitarian admission" (30%), and "Number of persons resettled" (24%). These advancements are however driven by few Member States, such as Romania, Finland and Sweden, having nearly already achieved their targets. Germany is leading in terms of absolute numbers of persons resettled and admitted through humanitarian admission.

Progress towards AMIF milestones and targets has been impacted by both external factors, such as the war in Ukraine and COVID-19, **and internal challenges** such as staffing shortages and regulatory issues. While some Member States have addressed these challenges through strategies such as increasing staff or simplifying procedures, there is no uniform approach to overcoming these barriers. Nonetheless, **good practices have emerged**, including capacity building, flexible project objectives, and effective crisis response, demonstrating the resilience of AMIF in supporting migration management and integration.

As regards the **progress in the implementation of the Thematic Facility, by mid-2024 the AMIF work programme 2021-2022, the specific EMAS 2021 work programme and the EMN 2021-2022 work programme were fully implemented**, meaning that the corresponding budget has been fully committed, either by allocating additional resources to the programmes (Specific Actions, resettlement, and relocation, implemented in shared management) or through grants and other administrative arrangements (Union Actions, implemented in direct or indirect management). The implementation of the 2023 – 2025 work programme is on track.

By mid-2024, the AMIF Thematic Facility has supported 656 projects under Union Actions, 19 EMAS projects and 22 Specific Actions. In addition, a total of EUR 730 million has been allocated to the programmes for the funding of resettlement and humanitarian admission activities and EUR 14.7 million for the funding of relocation activities (both under SO4). Overall, Union Actions are considered by the projects' beneficiaries particularly effective in strengthening and developing legal migration and in contributing to the integration and social inclusion of third-country nationals.

Interviewed Managing Authorities also share a **positive judgement on the effectiveness of the Fund to address its intended objectives** (under both the programmes and the Thematic Facility).

Concerning the suitability of the monitoring and evaluation framework to inform on the progress towards the achievement of the objectives of the instrument, the evaluation concludes that **the monitoring and evaluation framework for AMIF has seen significant improvements compared to the 2014-2020 period**, including in terms of more detailed explanatory documents and resources provided to Member States. However, **challenges persist in terms of quality of data collection and reporting**. Those mainly relate to issues such as missing or inflated data, unsubstantiated outputs, and inconsistent reporting. The evaluation highlights that higher efforts should be deployed in supporting the understanding of monitoring requirements by the final beneficiaries.

Based on qualitative information (interviews with Managing Authorities and beneficiaries) the evaluation reports a **widespread perception of excessive administrative burden**, including due to duplication in the provision of information at different stages and for different purposes. However, it is too early to judge on whether the burden of the system is proportionate with respect to its benefits in terms of transparency and policy development. Other findings of the evaluation point in direction of possible gaps in the coverage of the effects of the funding based on the existing set of common output and result indicators laid down in Annex VIII AMIF Regulation (too broad scope of certain indicators or missing indicators in certain policy areas).

Concerning **Union Actions**, the evaluation concludes that they utilise a structured yet flexible framework, employing standardised templates and detailed reporting guidelines to ensure **high data quality and timely, and accurate financial and narrative reporting**.

Despite the challenges linked to the stricter rules introduced by the CPR on the application of the partnership principle, **relevant partners are broadly and effectively involved in the management of AMIF across all stages of the programming, implementation, monitoring and evaluation**.

The **involvement of relevant partners** in the preparation, implementation, and evaluation of the AMIF **has been consistently emphasised by all Member States**. The Member States have employed a variety of mechanisms to ensure broad participation throughout the Fund's cycle. **Stakeholders such as civil society organisations, local authorities, and international bodies have been actively engaged**, particularly in the development of the programmes and through membership in Monitoring Committees. Challenges in the involvement of the partners are signalled in relation to difficulties by the participating stakeholders in fully understanding the somehow complex legislative framework and operational aspects linked to the implementation of AMIF.

The analysis confirms that **all Member States are committed to upholding the horizontal principles, including gender equality, non-discrimination, and sustainable development, within their programmes**. National mechanisms, such as training, audits, and compliance checks, are in place to ensure adherence to these principles, though their effectiveness varies across countries. While gender equality and non-discrimination are actively promoted, sustainable development receives a less prominent attention. Overall, while progress has been made, **gaps remain in the consistency of reporting on the horizontal principles**.

The analysis of communication measures confirms that **all Member States have put in place various mechanisms to disseminate information on the AMIF**. While many Member States have established communication strategies, these are often only described in general terms in the available documentation without detailed explanations of their implementation. Overall, **the communication measures are deemed successful in reaching a broad audience, but challenges persist in fully engaging smaller organisations and Civil Society Organisations**. Despite these challenges, the measures have contributed to improved visibility and outreach compared to the previous programming period.

5.1.2 Efficiency

Overall, **the Fund demonstrates a commitment to supporting cost-effective measures**, with evidence of diverse interventions that align with best practices in areas such as asylum, integration, and voluntary return. However, its **cost-effectiveness is unevenly realised**. While simplified cost options and flat-rate technical assistance have contributed to reducing administrative burden, the implementation of simplified cost options is inconsistent, and **unit cost calculations are not systematically applied to optimise spending**. Additionally, disparities in costs per unit across similar activities highlight gaps in efficiency. Despite these challenges, the Fund's emphasis on cost-effectiveness as a criterion for project selection and its ability to address urgent needs through components like Emergency Assistance reflect its potential to improve efficiency.

The cost-efficiency of the management and control system under the Fund shows mixed results. On one hand, the system has benefited from the **introduction of simplification measures such as flat rates, lump sums, and electronic data exchange systems**, which have eased administrative burdens and streamlined certain processes. **Technical Assistance has played a critical role in strengthening management capacities, with resources allocated to improve IT systems and provide training**. These measures have contributed to a more proportionate administrative burden compared to the previous programming period.

On the other hand, **challenges persist**. Many **beneficiaries and Managing Authorities report that regulatory and monitoring requirements remain cumbersome**. Issues such as duplicative data entry, inconsistent application of simplification measures, and delays in the implementation of integrated information systems undermine the overall efficiency of the system. These challenges suggest that while progress has been made, the management and control system still requires further refinement to fully optimize its cost-efficiency.

Key areas for improvement include system integration and automation. Interoperability between national systems and EU platforms would reduce duplicative data entry, while automating processes like indicator tracking could cut manual work and errors. Revising reporting requirements, especially for smaller projects, and **expanding the use of lump sums and flat rates would also ease administrative burdens**. **Capacity-building initiatives to train Managing Authorities and beneficiaries in data management could further enhance efficiency**. Implementing these measures would better align administrative tasks with the Fund's goals, ensuring more resources are directed toward achieving strategic objectives.

5.1.3 Coherence

The AMIF demonstrates a satisfactory degree of coherence with initiatives supported under its policy domain, particularly between the Member States programmes and the Thematic Facility, as well as between the programming under AMIF and other EU Funds.

The relationship between the AMIF's **Member States' Programmes and the Thematic Facility is broadly complementary**, although the clear delineation between these two components remains a challenge in practice. Only some Member States reported on the alignment and complementarity between the fund components, highlighting the need for improved integration and transparency in reporting practices. However, the Member States that reported on coherence in their APRs and national mid-term evaluations viewed it positively.

At the EU level, efforts to ensure coherence between the AMIF and policy agendas are actively pursued. The Member States generally align their AMIF programmes with EU priorities, with many reporting significant coherence with national strategies. While inter- and intra-agency cooperation is widespread, further details on the coordination mechanisms in place are needed to evaluate the effectiveness of these efforts.

Overall, while further reporting on internal coherence is necessary for a more comprehensive analysis, the data available exhibits a satisfactory degree of coherence.

The AMIF demonstrates strong complementarities with other EU Funds, such as the ESF+, the BMVI and the ERDF. These Funds share similar strategic objectives, and **synergies are pursued through coordination mechanisms** such as joint Monitoring Committees and regular exchanges of information. While there are occasional overlaps in objectives, these are largely justified by the distinct roles each Fund plays in the migration and integration landscape. In terms of complementarities, the NDICI and the RRF work alongside the AMIF by addressing different areas of support. The NDICI focuses on long-term development in third countries, while the RRF provides immediate socio-economic support to EU Member States. Together, they strengthen overall resilience and integration capacity in response to crises. However, concerning funding in the external dimension, enhanced cooperation and coordination on programming both between the Commission services and with EU Member States are needed.

Overall, while there are challenges in the seamless coordination of the various AMIF instruments and other EU Funds, in particular due to the diverse rules and procedures of each Fund, the AMIF's design and operational mechanisms foster coherence and complementarity.

5.1.4 How did the EU intervention make a difference and to whom (EU added value)?

Overall, the assessment of the EU added value of AMIF reveals significant contributions across various dimensions.

AMIF has demonstrated clear **scope effects in the majority of Member States (19)**, by **addressing additional target groups and introducing new interventions** to meet emerging needs, such as unaccompanied minors and Ukrainian refugees. The programme's

flexibility allowed for a substantial expansion in both the groups served and the services provided, particularly in response to the Ukrainian refugee crisis.

In terms of **scale effects**, AMIF has enabled the **expansion of services** and **increased the number of end-users** reached in 11 Member States. This was particularly evident in countries responding to migration crises, such as the influx of Ukrainian refugees.

Function effects are also evident, with AMIF **enhancing administrative capacity** in managing migration and asylum processes in several Member States. This led to **improved management of asylum seekers and integration services**, contributing to the EU's added value in handling migration challenges, for example, through improved capacity and coordination, provision of training, infrastructure development, and fostering of new partnerships.

Despite the extensive and pivotal support provided by AMIF, **there is no strong evidence of Member States being excessively dependent on EU funding**. National resources continue to play a key role, with AMIF serving as a complementary source of funding. Some Member States have taken measures to avoid full dependence on EU Funds by sustaining long-term integration services with national resources. Some degree of dependency on AMIF funding emerged only in two Member States.

Finally, **the Thematic Facility**, especially through Specific Actions and EMAS, has **successfully addressed broader priorities with high Union added value**, contributing significantly to EU-wide goals. Such projects focused on improving reception conditions, providing psychological support, and ensuring humane treatment and effective migration management, aligning with EU standards and priorities. Generally, AMIF funding is seen as essential for implementing specific projects that could not have been achieved without the Fund, thus ensuring a common European response to migration and asylum challenges.

5.1.5 Is the intervention still relevant (Relevance)?

The AMIF addresses evolving needs both at the time of Programme adoption and during Programme implementation. A proper identification of stakeholders to be involved in the AMIF implementation ensured that relevant inputs on evolving needs to be addressed were taken into account. Also, **AMIF allocated resources and implemented measures included in the legal basis were deemed relevant to address evolving needs.**

Moreover, **Thematic Facility** Work Programmes have demonstrated a clear focus on **addressing key priority needs and target groups**, including asylum seekers, third-country nationals under international protection, vulnerable children, unaccompanied minors and victims of trafficking of human beings.

Overall, limited concerns remain regarding whether the planned milestones and targets remain proportionate or are apt to follow changes in the financial resources allocated to different Specific Objectives to address evolving needs.

The evaluation has found that **Member States can adapt their programmes to evolving needs**, especially thanks to existing financial flexibility mechanisms under the Fund Regulation and Thematic Facility. Another finding refers to the fact that the needs assessment performed at the beginning of the programme is not regularly and systematically updated during programmes' implementation. This could undermine the capability to fully and timely adapt to evolving needs. However, there is **evidence that**

timely inputs on evolving needs during programme implementation are provided by stakeholders involved within the Monitoring Committee.

Overall, the flexibility enshrined in the AMIF Regulation has allowed Member States to promptly adapt their Member State Programmes to evolving needs during the implementation phase (e.g. growing number of beneficiaries of temporary protection, due to the war situation in Ukraine). Also, the Thematic Facility has greatly helped to address emerging needs and emergency situations. However, **some concerns remain regarding the flexibility of procurement procedures**. Indeed, there is evidence of **administrative barriers** across Member States that do not ensure a full flexibility of procurement procedures preventing their swift adaption to evolving needs.

5.2. Lessons learned

A reflection should take place with and between the Member States on the best practices and mechanisms to promote flexibility in programme and project management to respond, quickly and in a complementary manner to the Thematic Facility interventions, to the impact of external factors, such as the Russian war of aggression towards Ukraine or the COVID-19 pandemic, which can then cause delays and complications in project implementation and eventually in the achievement of the programmes' objectives.

Internal administrative issues in certain Member States, such as insufficient allocation of human resources and lack of coordination between relevant actors, hindered the smooth implementation of AMIF. Further efforts should be considered to promote efficient internal processes and ensure smoother implementation. Similarly, while some remedy strategies were implemented, only a few Member States had identifiable and effective strategies in place to overcome the delays and challenges they faced. The Member States should be encouraged and supported in developing and documenting comprehensive, proactive remedy strategies for addressing challenges.

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 for better attracting and supporting more small beneficiaries and Civil Society Organisations, which currently have difficulties accessing the AMIF funding due to their lack of experience with EU funding and co-financing requirements. It is worth considering providing targeted support to smaller organisations with application procedures for EU funding, encouraging Member States to ensure inclusive communication on funding opportunities and introducing additional capacity building measures for smaller organisations.

Another avenue that could be explored to broaden the spectrum of AMIF beneficiaries to smaller organisations relates to the establishment of dedicated financial instruments (e.g. loans, guarantees, microcredit).

There is a window of opportunity for the Member States to further involve certain categories of partners in the implementation of the AMIF programmes, for example by launching regular calls, throughout the programming period, for Civil Society Organisations and local/regional authorities to participate in the Monitoring Committees. Consideration could also be given to alternative consultation mechanisms for organisations unable to commit to roles in the Monitoring Committees, due to resource constraints.

There is a need to reinforce the understanding of the performance framework of the AMIF Regulation and its potential benefits. 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 how to improve the target setting, as well as to 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 how the performance framework can contribute to the management of the Member States programmes, beyond the purely formal reporting that is required by the AMIF Regulation.

This is a precondition to an improvement in quality of the performance monitoring 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 on the reporting of implementation data and provide ad hoc recommendations to ensure the quality, consistency and reliability of the information on performance.

Promoting digitalisation and automatisisation for the collection and submission of information and providing targeted training to the final beneficiaries of the AMIF support could help to streamline and simplify the application of monitoring requirements.

There is potential room for further simplification, using the possibilities offered by the CPR to facilitate administration and implementation. It is worth, for the Commission and the Member States, continuing to support the use of simplified cost options, such as flat rates, lump sums, and unit costs, to minimise administrative overhead, especially for smaller projects and routine expenses.

While many Member States have communication strategies in place, they are often not elaborated in detail. This lack of specificity can hinder the effectiveness of communication efforts. The Member States could make better use of the guidance and toolboxes on communication and visibility requirements provided for the CPR funds.

Clarity concerning cooperation between and within national authorities could be improved. Although inter- and intra-agency cooperation at national level is widely reported across Member States, many countries provide limited or vague details regarding how cooperation is managed. This limits the evaluation of cooperation to ensure coherence and consequently the establishment of possible best practices.

Finally, coordination with the other Union Funds could be further reinforced. Particularly in regard to external spending programmes, such as the NDICI, and in view of the implementation of the Pact on Migration and Asylum. At national level, mechanisms that ensure an appropriate awareness of the possibilities offered by other Funds of the Union would contribute to a more efficient planning and design of the interventions.

ANNEX I: PROCEDURAL INFORMATION

This evaluation has been implemented by DG HOME, as responsible for the implementation of AMIF in the Commission. The evaluation was launched in 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 Fund when carrying out the evaluation, and the limited evidence available in terms of effectiveness of the Fund, 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, DG TRADE, JRC, SJ, DG ECHO, DG EMPL, and OLAF.

The first meeting of the Interservice Group was held on 30 June 2023, where the group discussed the actions 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 8 March 2024, 3 May 2024, 9 September 2024 and 18 November 2024. The draft version of this Staff Working Document was submitted to the group for written consultation on 17 December 2024.

The preparatory study was confided to a consortium made up of EY Germany and Technopolis Group following an open call for tender launched on 3 October 2023. The contract was signed on 7 March 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 for its meeting of 12 February 2025.

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

The RSB identified the following key issues:

- 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 the 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.

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

RSB Comment	Follow-up
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.	References to the evidence from which findings and conclusions are drawn have been consistently reinforced through the document. For example, details on the ECA's perception of the suitability of the monitoring and evaluation framework has been added to section 4.1.1 Effectiveness.
The conclusions, in particular on effectiveness and efficiency, should be more nuanced and better aligned with the evidence available.	This has been applied through the report.
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.	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 Fund to draw significant information on effectiveness and efficiency for the remainder of the funding period. This assumption was acknowledged and agreed with the ISG at the start of the preparatory work for this evaluation. The progress in financial reporting has not been considered in the evaluation as evidence of effectiveness. Rather the progress in financial implementation demonstrates the high level of needs from the target groups and that projects are

RSB Comment	Follow-up
	being implemented efficiently from an operational point of view.
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.	Additional information has been provided in the section 2.2 on points of comparison, regarding the performance framework and the way of measuring progress.
The mid-term evaluation report 2021-2027 should take into account the results of the final evaluation 2014-2020.	As explained in the revised version (section 2.2): “It should be noted that the ex-post evaluation was ongoing and at a preliminary stage at the time of writing this Staff Working Document, hence final results regarding the ex post evaluation are not yet available to serve as a basis of comparison. As a response to the Russian war of aggression against 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 implementation as a continuum. This has allowed to have retrospective view, as well as complying with the requirement in the AMIF regulation ⁽⁷⁸⁾ to take into account the results of the retrospective evaluation for the 2014-2020 period. In addition, serving as best available data, the findings from the interim evaluation of the AMIF 2014-2020 programming period from 2018 as well

⁽⁷⁸⁾ Article 34(1) of the [AMIF Regulation](http://data.europa.eu/eli/reg/2021/1147/oj) (OJ L 251, 15.7.2021, p. 1, ELI: <http://data.europa.eu/eli/reg/2021/1147/oj>)

RSB Comment	Follow-up
	as data from SFC2014 for implementation of the AMIF 2014-2020 up until the end of 2017 have been used as a point of comparison. ⁷⁹ Notably, since SFC2014 contains annual data for the implementation, the considered implementation period for the AMIF 2014-2020 is 6 months longer than the available data for the present evaluation, which covers an implementation period up until 30 June 2024. Therefore, caution must be applied with regard to the interpretation of comparisons of the progress made.”
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.	Additional information has been provided on output indicators in section 4.1.1. The intervention logics have been moved from the annexes to the main report. The details of the intervention logic have been expanded upon in section 2.2.
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.	Additional information has been provided in the section 2.2 on points of comparison, regarding the performance framework and the way of measuring progress.
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.	This has been reinforced in sections 2.2 and 4.1.1. Furthermore, the complete list of common indicators has been added to Annex II for reference.
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. Beyond acknowledging that there is room for improvement of monitoring, the lessons learned should include potential changes to	This has been reinforced in sections 2.2 and 5.2. The reasons behind the different degrees of implementation among Member States is described in section 3 within the limits of the information available at this time.

⁷⁹ The 2018 Interim evaluation has been conducted at roughly the same point in time during the implementation phase as the present mid-term evaluation. The data that informed the 2018 Interim evaluation comprises an implementation period up until 30 June 2017, corresponding to the data used for the present mid-term evaluation which includes implementation up until 30 June 2024.

RSB Comment	Follow-up
the reporting system and the established indicators in order to ensure the effective assessment of the fund's progress in the final evaluation.	
The report should provide more details on administrative costs and their assessment	Text was added in section 4.1.2 expanding on the challenges and limitations of assessing administrative costs. 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 funding recipients. Data on financial implementation is not connected to the performance indicators the Managing Authorities need to report on. As a result, the cost benefit analysis of the financial investment is rather limited. Some more in-depth work should be possible during the future ex-post evaluation of these instruments, once information becomes more complete and work on unit costs can be developed.
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.	This has been reinforced in section 4.1.2, and the limits to drawing conclusions on cost-effectiveness at this point in time were clarified.
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 (in particular, RFF, ESF and NDICI) and with the Pact on Migration and Asylum	This has been reinforced in section 4.1.3, including further analysis on coherence with EU external policy. The relevance of the AMIF with the Pact on Migration and Asylum has been added to section 4.3.
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.	This was reinforced in section 4.3. with more on the use of flexibilities to adapt Member State programmes to emerging needs.
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	This was reinforced in section 4.3 with examples of how AMIF resources expanded the scope of services and scaling up projects in Member States. Following the Better Regulation toolbox, additionality was covered by general

RSB Comment	Follow-up
could hamper the analysis of additionality in the final evaluation.	considerations regarding the added value; the item was not part of the Terms of Reference for this evaluation, as Member States are not requested to provide information in this respect to the Commission.

ANNEX II. METHODOLOGY AND ANALYTICAL MODELS USED

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

Methodology

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

The inception phase was characterised by preparing the work to be done. This included preliminary desk research, scoping interviews with officials from the Commission, stakeholder mapping, 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 data collection phase focused on gathering data by 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, mapping the allocations by type of intervention and target group, launching a targeted survey and conducting interviews and a focus group. This phase concluded with an interim report which was discussed with the Steering Group, revised and then accepted.

During the analysis phase the contractors focused on analysing the data collected to draw conclusions for the evaluation questions. During this phase the contractors held the second EU level focus group 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** relied upon reviewing approximately 125 documents including evaluation reports at the EU and national level, the annual performance reports submitted in 2023 and 2024, notes to the Home Affairs Funds Committee, regulatory and policy frameworks, grey literature and academic publications.

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

Regarding the **consultation activities**, 90 **interviews** were completed during the course of the study. The interviews included scoping interviews and semi-structured interviews to gather data for the analysis, including the country case studies and thematic case studies.

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 on understanding the challenges encountered, good practices, and policy issues affecting the achievement of the AMIF specific objectives.

The second level focus group was held on 12 December 2024 and consisted of Commission officials, Managing Authorities, and the European Union Agency for Fundamental Rights. The objective of the focus group was to validate the evaluation findings and further develop the lessons learned.

In addition to the focus groups, four **targeted surveys** were launched to target various stakeholders. Of the 419 surveys completed, 37 were from National/Managing Authorities and 382 were from beneficiaries. The results of the survey fed into the main analysis.

The study included seven **country case studies** (DE, FR, IT, EL, PL, RO, and LT) to dive deeper into the implementation of AMIF 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 the horizontal priorities. The thematic case studies allowed for deep-dives into certain aspects of the AMIF 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.

Limitations and mitigation measures

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

First, there were several limitations concerning the data which particularly impacted the analysis of effectiveness and efficiency. First, the level of granularity of the data differed across management modalities. Similarly, the heterogeneity of data varied across the fund components and management modes due to varying arrangements and monitoring systems. For example, the data on resources paid for Union Actions was excluded from the financial analysis as the resources paid do not accurately reflect the progress of the work done.

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

In addition, the Member State mid-term evaluations and target setting methodologies displayed varying levels of quality and depth. Similarly, the APRs demonstrated varying levels of completeness and consistency. Finally, the data on output and result indicators 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

Supporting information, tables and figures

The following section presents additional information, large tables and diagrams that are referenced in the main report.

AMIF 2021-2027 Structure

The AMIF budget is implemented through Member States Programmes and Thematic Facility Work Programmes.

The Member States programmes absorb around two thirds of the AMIF budget and cover a period of seven years (2021-2027). The interventions included in the programmes are programmed and implemented by the Member States, with the Commission mainly acting in an advisory role. The programmes are formally approved by the Commission and managed in shared responsibility between the Member States and the Commission (“shared management”).

The Thematic Facility Working programmes are multiannual. During the 2021-2027 programming period there three Work Programmes are foreseen, respectively covering the years 2021-2022, 2023-2025 and 2026-2027. The interventions under the work programmes are programmed by the Commission. These interventions are implemented by the Commission (“direct management”), or by international bodies acting on behalf of the Commission (“indirect management”) or by the Member States (“shared management”).

The components of the Thematic Facility Work Programmes are the following:

- **Specific Actions:** transnational or national projects that bring Union added value in line with the objectives of the Fund for which one, several or all Member States may receive an additional allocation to their programmes;
- **Union Actions:** transnational projects or projects of particular interest to the Union implemented in accordance with the objectives of the Fund;
- **Resettlement:** the admission following a referral from the UNHCR of third-country nationals or stateless persons from a third country to which they have been displaced, to the territory of the Member States, and who are granted international protection and have access to a durable solution in accordance with Union and national law;
- **Humanitarian Admission:** the admission following, where requested by a Member State, a referral from the European Asylum Support Office (EASO), the United Nations High Commissioner for Refugees (‘UNHCR’), or another relevant international body, of third-country nationals or stateless persons from a third country to which they have been forcibly displaced to the territory of the Member States, and who are granted international protection or a humanitarian status under national law that provides for rights and obligations equivalent to those of Articles 20 to 34 of Directive 2011/95/EU for beneficiaries of subsidiary protection;
- **Relocation:** the transfer of applicants or beneficiaries of international protection from another Member State in accordance with Article 17 of Regulation (EU) No

604/2013 of the European Parliament and of the Council (36) or as a result of similar forms of relocation;

- **Emergency Assistance (EMAS):** the Fund shall provide financial assistance to address urgent and specific needs in the event of duly justify emergency situations resulting from one or more of the cases described in Article 31(1) of AMIF Regulation (EU) 2021/1147).



List of common output and result indicators (cp. Annex VIII of the AMIF Regulation)

Output indicators

Indicator code	Indicator name
O.1.1	Number of participants supported
O.1.2	Number of participants in training activities
O.1.3	Number of newly created places in reception infrastructure in line with Union acquis
O.1.4	Number of renovated/refurbished places in reception infrastructure in line with Union acquis
O.2.1	Number of participants in pre-departure measures

Indicator code	Indicator name
O.2.2	Number of local and regional authorities supported to implement integration measures
O.2.3	Number of participants supported
O.2.4	Number of information packages and campaigns to raise awareness of legal migration channels to the Union
O.2.5	Number of participants receiving information and/or assistance to apply for family reunification
O.2.6	Number of participants benefitting from mobility schemes
O.2.7	Number of integration projects where local and regional authorities are the beneficiary
O.3.1	Number of participants in training activities
O.3.2	Number of equipment purchased, including number of ICT systems purchased / updated
O.3.3	Number of returnees who received re-integration assistance
O.3.4	Number of places in detention centres created
O.3.5	Number of places in detention centres refurbished/renovated
O.4.1	Number of staff trained
O.4.2	Number of participants who received pre-departure support

Source: Regulation (EU) 2021/1147, Annex VIII.

Result indicators

Indicator code	Indicator name
R.1.5	Number of participants who consider the training useful for their work
R.1.6	Number of participants who report three months after the training activity that they are using the skills and competences acquired during the training
R.1.7	Number of persons placed in alternatives to detention
R.2.8	Number of participants in language courses who have improved their proficiency level in the host-country language upon leaving the

Indicator code	Indicator name
	language course by at least one level in the Common European Framework of Reference for Languages or national equivalent
R.2.9	Number of participants who report that the activity was helpful for their integration
R.2.10	Number of participants who applied for their qualification or skills acquired in a third country to be recognised / assessed
R.2.11	Number of participants who applied for a long-term residence status
R.3.6	Number of returnees voluntarily returned
R.3.7	Number of returnees who were removed
R.3.8	Number of returnees subject to alternatives to detention
R.4.3	Number of applicants for and beneficiaries of international protection transferred from one Member State to another
R.4.4	Number of persons resettled
R.4.5	Number of persons admitted through humanitarian admission

Source: Regulation (EU) 2021/1147, Annex VIII.

Table 1: Overview of how Member States Programmes address the needs identified in the intervention logic

Specific Needs (IL)	AT	BE	BG	CY	CZ	DE	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
S01 - CEAS																										
Insufficient provision of material aid																										
Insufficient availability of beds in reception facilities in line with the Union <i>acquis</i>																										
Room for enhancing effectiveness of identifying vulnerable groups and the provision of tailor-made services to these groups during reception																										
Room for strengthening staff skills to effectively implement Union <i>acquis</i> relating to reception																										
Gaps between reception and further social inclusion																										
Wide use of detention, including for vulnerable groups																										
Delays and backlogs in the processing of requests for asylum																										
Room for enhancing support to asylum seekers in relation to asylum procedures, including e.g. in relation to knowledge on rights and procedures as well as specialised services for vulnerable groups																										
Need to ensure continuous monitoring and evaluation to generate a complete understanding of the																										

Specific Needs (IL)	AT	BE	BG	CY	CZ	DE	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
effectiveness of existing practices																											
Room for enhancing processes for the implementation of humanitarian admission of existing practices																											
Varying quality of protection systems in third countries, with implications on migration flows into the EU and the adherence to fundamental rights																											
S02 - Legal Migration																											
Insufficient information for TCNs on the complex EU policy framework on legal migration																											
Mobility obstacles for TCNs including based on an inconsistent implementation of the rules of family reunification for TCNs staying for specific purposes																											
Incomprehensive use of the potential cooperation with TCs																											
Barriers relating to the effective integration of TCNs into receiving societies, including e.g. based on insufficient access to supporting services, language barriers																											
Insufficient support for TCNs integration needs after arrival																											
Integration authorities need to be further strengthened to deal with the current workload																											
S03 - Irregular migration																											

Specific Needs (IL)	AT	BE	BG	CY	CZ	DE	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
Potential to enhance effectiveness and efficiency of returns																											
Potential to enhance re-integration support in the EU and in TCs																											
Need to deter and counter irregular migration and better inform about the legal migration routes and risks of irregular migration																											
Shortcomings relating to the conditions returnees face ahead of their return, including in relation to accommodation and preparatory measure																											
S04 - Solidarity and Cooperation																											
Disproportionate/high migratory pressures across MS with room for enhancing the use of tools to balance these																											
Disproportionate/high migratory pressures in TCs facing challenges to accommodate TCNs																											
Insufficient support to MS registering a comparably high number of TCNs																											

Source: national mid-term evaluations

Table 2: Progress and methodology thematic case studies

Case study	Purpose and scope of the case study	Progress and methodology
Union Actions	The purpose of the UA case study report is specifically focused on the implementation of Union Actions, aiming to evaluate them on the basis of effectiveness, efficiency, relevance, coherence and EU added value.	A Union Actions database was consolidated and analysed along agreed selection criteria, following which a long list was submitted to DG HOME and a short-list of 6 projects agreed. ⁸⁰ The case was developed using desk research and in-depth interviews with beneficiaries, supplemented by relevant information from the targeted survey and semi-structured interviews conducted in other activities of the mid-term evaluation.
EMAS	The purpose of the EMAS thematic case was to explore what types of activities have been implemented so far under the funding component, their outputs and results, and the implementation experiences of a selection of beneficiaries to identify lessons for future EMAS projects.	The Emergency Assistance projects were analysed using agreed selection criteria agreed with DG HOME, resulting in a longlist and a final shortlist of 4 projects. ⁸¹ The case was developed using desk research and in-depth interviews with beneficiaries, supplemented by relevant information from the targeted survey and semi-structured interviews conducted in other activities of the mid-term evaluation.
Ukraine	The aim of the Ukraine thematic case was to take a horizontal perspective and examine the adjustments made to the AMIF 2021 – 2027 period, focusing on the funding components UA, EMAS and SA. Specifically, this case explores the actions implemented, effects,	The Ukraine projects were analysed using agreed selection criteria agreed with DG HOME, resulting in a longlist and a final shortlist of 3 projects. ⁸² The case was developed using desk research and in-depth interviews with beneficiaries, supplemented by relevant information from the targeted survey and semi-structured interviews conducted in other activities of the mid-term evaluation.

⁸⁰ SAFE HUT- Holding safe spaces for women and girls' empowerment; Migration Partnership facility (MPF IV), Targeted support to key protection activities in Greece; Women-centred Intervention for Social Entrepreneurship Resilience; Fostering inclusion of LGBTIQ+ migrants at local level; Strengthening guardianship in the EU through capacity building, knowledge exchange and peer learning; Service and support management of the European website on integration

⁸¹ Shortlist of projects for EMAS 2021 – 2027: Urgent response to disproportionate influx of third-country nationals to Lithuania from Belarus, HOME/2021/AMIF/AG/EMAS/TF1/LT/0002; EU support through IOM to the Italian Ministry of Interior to ensure adequate reception conditions during emergencies and the safe and dignified transfer of migrants landed in Lampedusa to other reception centres in Italy (Su-Port), HOME/AMIF/CA/EMAS/TF2/IT/0018; Support for refugees from Ukraine at the initial stage of admission to Poland, HOME/2022/AMIF/AG/EMAS/TF1/PL/0008; Support for refugees from Ukraine at their admission and early integration in Poland, HOME/2022/AMIF/AG/EMAS/TF1/PL/0011; Adoption of emergency measures against the increase in arrivals of migrants and refugees at the Ceuta coast and border of Spain, HOME/2021/AMIF/AG/EMAS/TF1/ES/0001

⁸² Shortlist of projects Ukraine 2021 – 2027: The transition from emergency assistance to social sustainability and autonomous inclusion of Ukrainian refugees into Romanian society, AMIF/2023/SA/1.2.3/03; SAFE HUT- Holding safe spaces for women and girls' empowerment, AMIF-2022-AG-CALL-THB; Support for refugees from Ukraine at the initial stage of admission to Poland, HOME/2022/AMIF/AG/EMAS/TF1/PL/0008

Case study	Purpose and scope of the case study	Progress and methodology
	and implementation experiences of beneficiaries active in projects which focus on Ukraine.	
Specific Actions	The purpose of the Specific Action case study report is specifically focused on the implementation of Union Actions, aiming to evaluate them on the basis of effectiveness, efficiency, relevance, coherence and EU added value.	The selection of Specific Action Calls for the in-depth review was performed in two steps. First, the Study Team assessed the Specific Action Calls awarded in both programming period according to selection criteria (e.g. scope of Specific Actions, relevance of the topic, coverage of Specific Objectives), resulting in a long-list and a final selection of Calls. The case study analysis was performed by triangulating desk and field sources. However, since the availability of desk documents on the ongoing selected projects was highly limited, the analysis relies mostly on feedbacks collected through targeted interviews with beneficiaries.
Horizontal priorities		The evaluation team identified seven projects for the HP case study based on relevance, start date, value, and replicability. These projects were selected from EC databases (UA, SA, EMAS) and ongoing list of projects under the MS Programmes, published on the official websites. By November 6, four interviews with seven participants were completed: two UA projects (three participants), one SA project (two participants), and one MS Programmes project (two participants). The findings highlight lessons learned and replicable methodologies.

ANNEX III. EVALUATION MATRIX AND, WHERE RELEVANT, DETAILS ON ANSWERS TO THE EVALUATION QUESTIONS (BY CRITERION)

Effectiveness

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
EQ1: To what extent is the Fund on track to achieving its operational and specific objectives?	Implementation has started with operations selected for support of the MS Programmes under relevant specific objectives and types of intervention, except where a delayed start was planned by design or adequately justified	Share of operations planned that have been started or completed out of the total number of operations planned at MS Programme level		Mid-term national evaluations (where available)
		Reasons /justifications for delays relating to the implementation of selected operations in MS Programmes	Semi-structured interviews Targeted survey Country case studies	Mid-term national evaluations (where available) Annual Performance reports
	The early progress towards the achievement of the set milestones and target values, taking into account the timing for the adoption of the fund, is in line with the planning (or delays and changes can be adequately explained and justified)	Share of the following result indicators for which actual progress is aligned with the targets planned: R.1.5 Number of participants who consider the training useful for their work R.1.6 Number of participants who report three months after the training activity that they are using the skills and competences acquired R.1.7 Number of persons placed in alternatives to detention R.2.8 Number of participants in language courses who, upon leaving the language course, have improved their proficiency level in the host-country language by at least one level in the Common European Framework of Reference for Languages or national equivalent		SFC2021

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
		R.2.9 Number of participants who report that the activity was helpful for their integration R.3.6 Number of returnees voluntarily returned R.3.7 Number of returnees who were removed R.3.8 Number of returnees subject to alternatives to detention R.4.3 Number of applicants for and beneficiaries of international protection transferred from one Member State to another R.4.4 Number of persons resettled R.4.5 Number of persons admitted through humanitarian admission <i>*This analysis can be extended to common indicators for which targets and milestones exists such as:</i> New, renovated or refurbished places in reception infrastructure are created in accordance with <i>Union acquis</i> Support services are available for TCNs, including qualified psycho-social and rehabilitation services Suitable training offers for staff dealing with asylum seekers are implemented Services for TCNs reflect any special needs, including information on rights, legal assistance, translation and interpretation assistance TCNs are placed in alternatives to detention instead of detention wherever possible Staff participates in the training and uses it in their daily work Information packages and campaigns to raise awareness of legal migration channels to the Union are developed		

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
		Mobility schemes are established or developed, including measures to enhance employability Participants receive information or assistance in applying for family reunification Pre-departure support for TCNs is developed and implemented in cooperation with TCs Rejected asylum applicants are returned / removed to their TCs Equipment for monitoring is purchased, including ICT systems or other tools to monitor return operations Persons are admitted through humanitarian admission schemes MS with high number of applicants for international protection benefit from relocation schemes Applicants for and beneficiaries of international protection are transferred from one Member State to another		
		Progress towards the output indicators e.g.: output/ result indicators: O.1.1 Number of participants supported O.1.2 Number of participants in training activities O.1.3 Number of newly created places in reception infrastructure in accordance with Union acquis O.1.4 Number of renovated or refurbished places in reception infrastructure in accordance with Union acquis O.2.1 Number of participants in pre-departure measures O.2.2 Number of local and regional authorities supported to implement integration measures O.2.3 Number of participants supported		SFC 2021

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
		O.2.4 Number of information packages and campaigns to raise awareness of legal migration channels to the Union O.2.5 Number of participants receiving information or assistance in applying for family reunification O.2.6 Number of participants benefitting from mobility schemes O.2.7 Number of integration projects where local and regional authorities are the beneficiary O.3.1 Number of participants in training activities O.3.2 Number of equipment purchased, including number of ICT systems purchased or updated O.3.3 Number of returnees who received reintegration assistance O.3.4 Number of places in detention centres created O.3.5 Number of places in detention centres refurbished or renovated * A factorial analysis can be performed to reduce the number of indicators to be used		
	Operations supported via the Thematic Facility have started in all areas	Share of activities supported via the Thematic Facility that have started per area	Semi-structured interviews Thematic case studies	Project mapping (Long list of Thematic facility)
	There is not significant delay in the start and implementation of projects in direct and indirect management	Share of projects implemented under direct and indirect management for which actual progress is aligned with the planned milestones and targets Reasons /justifications for delays relating to the implementation of selected operations	Semi-structured interviews Thematic case studies	Project mapping (Long list of Thematic facility)
	The Union Actions supported are effective in achieving / progressing towards their aims	Share of consulted stakeholders that consider the Union Actions support is effective, e. g in supporting the Member States capacity to	Semi-structured interviews Thematic case Targeted survey	

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	Challenges that affect implementation and the progress towards the objectives of the Fund are duly identified and linked with effective remedy strategies	manage the migration crises and enhance the cooperation with Third countries		
		The extent to which internal/external factors (positive and negative) influenced the progress towards the achievement of target values	Targeted survey Semi-structured interviews Country case studies Thematic case studies	MS Programmes Annual Performance reports Mid-term nation evaluations (where applicable) Thematic Facility Work Programmes
		The extent to which remedy strategies were duly identified and effective in mitigating the effects of the challenges face (considering MS Programmes, Thematic Facility) Share of consulted stakeholders that consider the strategies implemented were effective in addressing the challenges that influenced the implementation	Targeted survey Semi-structured interviews Country case studies Thematic case study	Thematic Facility Work Programmes Annual Performance reports (in case of the MS who reported on this topic) Mid-term national evaluations (where applicable)
	The Fund makes use of available good practices where relevant and possible	The extent to which the MS Programmes make use of good practices (e.g. integration programs, innovation learning solutions, youth inclusion, building partnership between public authorities, CSOs), and other stakeholders to ensure a multi-disciplinary and coordinated approach to migrant and refugee assistance)	Country case studies Targeted survey	Member States Programmes
		The extent to which Union Actions made use of good practices, e.g. integration programs, youth inclusion, building partnership between public authorities from multiple countries to ensure a multi-disciplinary and coordinated approach to migrant and refugee assistance	Thematic case studies Targeted survey	
		The extent to which Emergency Assistance actions make us of good practices (e.g. rapid	Thematic case studies Targeted survey	

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
		response teams, legal advisory services, multi-language information dissemination)		
EQ2: To what extent is the monitoring and evaluation framework suitable to inform on the progress towards the achievement of the objectives of the fund?	A reliable electronic data exchange system (especially between Managing Authorities/ Intermediate Bodies and beneficiaries) for recording and storing data for monitoring and evaluation is in place The data provided by the MS are reliable	The extent to which the data reported by Member States reflects the current level of implementation of the MS Programmes	Semi-structured interviews	Target setting methodologies (of certain countries) SFC 2021 (data validation checks (quantitative analysis)
	The reporting on output and result indicators correctly reflects the level of implementation on the ground (not over/underreporting)			
	Monitoring requirements are duly understood by the actors involved in the data supply process and training or info-sessions are organised where relevant	Share of consulted stakeholders that consider data reported by Member States reflects the current level of implementation of the MS Programmes	Targeted survey Semi-structured interviews Country case studies	
		The extent to which guidance is easy to access, including written instructions/ guidelines, trainings or info-sessions Extent to which support, and guidance is considered useful by stakeholders	Semi-structured interviews Country case studies	Target setting methodologies (of certain countries) Available information on support and guidance
	The common indicators capture the main achievements of the fund in line with the intervention logic of the fund	The extent to which all relevant components of the LoI are captured either by the common indicators or by fund specific indicators Share of stakeholder that consider that all relevant components of the LoI are linked with monitoring indicators	Semi-structured interviews Evaluation team analysis based on the validated versions of the LOI	

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	Fund specific indicators are used to fill any substantial gap in the common indicators based on the intervention logic of the fund			
	The overall arrangements are sufficient evidence to be used as a basis to estimate the impacts of the funds (i.e., impacts attributable to the fund with a clear causal link), thus paving the way for the ex -post evaluation	The extent to which the set of data recorded are sufficient to generate an impact assessment e.g. identification of gaps regarding the information recorded, using also the stakeholders' consultation (selection of MS will be considered)	Semi-structured interview Country case studies	Target setting methodologies (of certain countries)
	A proportionate monitoring system exists for activities carried out in direct and indirect management, that allows understanding the performance and outcomes of the projects supported whilst ensuring sufficient flexibility and customisation	Quality, accuracy and level of up to date of data included in the monitoring system Perception of the stakeholders regarding the level of burdensome of the informative requirements	Semi-structured interviews Thematic case studies	SFC2021 (Analysis of the information collected through the monitoring system)
		The extent to which the information collected through the monitoring system allow the formulation of robust conclusions regarding the progresses made	Semi-structured interviews	SFC2021 (Analysis of the information collected through the monitoring system)
EQ3: How was the involvement of the relevant partners ensured across all	There is a strategy in place, at national level, to identify, inform and reach the most relevant partners	Share of consulted stakeholders that consider all relevant stakeholders are involved in the Monitoring Committee of the MS Programmes	Semi-structured interviews Country case studies	MS Programmes

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
stages of the programming, implementation, monitoring and evaluation?	and which aims to ensure their balanced representation in the monitoring committee Relevant partners participate in the monitoring committee in line with their role as defined by the relevant rules of procedure	Share of MS with adequate methodologies regulating the composition of the Monitoring Committees at MS Programme level ⁸³ The extent to which relevant partners attend the meetings in the monitoring committee ⁸⁴	Semi-structured interviews Country case studies	Member States Programmes
	Relevant partners have been identified and involved at the programming stage	Share of consulted stakeholder that consider partners involved in the programming stage were relevant	Semi-structured interviews Country case studies	
	Actions are put in place to enable the participation of the partners across all stages of the fund cycle	Number of actions that are put in place to enable the participation of the partners across all stages of the fund cycle (for the MS Programmes or a selection of them)	Country case studies Semi structured interviews	Member States Programmes Annual Performance reports, any other project/ Programme reporting
		Number of actions that are put in place to enable the participation of the partners across all stages of the fund cycle, considering the thematic facility	Semi-structured interviews Thematic case studies	
	Relevant stakeholders are involved, in line with their roles, in the process of determining the main priorities for the work Programmes and activities of the thematic facility	The extent to which relevant stakeholders are involved in the process of determination the main priorities for the work Programmes and activities of the thematic facility	Semi-structured interviews Thematic case studies	
EQ4: To what extent does the fund respect	There are suitable organisational and	The extent to which the programming documents and legislative frameworks include	Thematic case studies Targeted survey	Work Programmes

⁸³ Considering the limited data available, this was checked as part of the country case studies

⁸⁴ Considering the limited data available, this was checked as part of the country case studies

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
or promote in its implementation the horizontal principles?	procedural arrangements in place to ensure the respect of the charter of fundamental rights of the EU in the fund implementation - Art. 9(1)	mechanism for the respect of the Charter of Fundamental Rights of the EU for those main actions for which the principles are relevant, at the EU level and in (selected) Member States		Regulatory and policy frameworks such as Commission Recommendations, EU Regulations establishing or relating to the AMIF and other funds, Commission implementing regulations, Commission delegated regulations
	There are suitable organisational and procedural arrangements in place which ensure that appropriate steps are taken to take into account and promote gender equality and gender mainstreaming across all stages of the preparation, implementation, monitoring, reporting and evaluation of the fund - Art. 9(2)	The extent to which the programming documents and legislative frameworks include suitable organisational and procedural arrangements at the level of interventions (under shared, direct and indirect management) in order to: - ensure that appropriate steps are taken to take into account and promote gender equality and gender mainstreaming across all stages of the Fund -allow taking appropriate steps to prevent discrimination on all grounds and across all stages of the programming cycle - ensure that implementation is aligned with the objective 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 Identification of good practices and challenges in this regard	Semi-structured interviews Thematic case studies Targeted survey Country case studies	MS Programmes Annual Performance reports Thematic Facility Work Programmes
	There are suitable organisational and procedural arrangements in place that allow taking appropriate steps to prevent discrimination on all grounds and across all stages of the programming cycle - Art. 9(3)			
	The fund has suitable			

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	arrangements that ensure that implementation is aligned with the objective 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 - Art. 9(4) There are suitable organisational and procedural arrangements in place to ensure the respect of the charter of fundamental rights of the EU is ensured, gender equality and gender mainstreaming are promoted and discrimination on all grounds is prevented in the activities funded in direct/indirect management			
EQ5: To what extent is the fund effective in communicating and disseminating on its opportunities as well as achievements?	There is a communication strategy in place, with correctly identified target population as well as relevant monitoring arrangements, including appropriate and measurable targets for the	Identification of communication strategies concerning the overall fund and the MS Programmes The extent to which available communication strategies identified relevant target population, include relevant monitoring arrangements Success of existing communication strategies, including e.g. based on existing analyses relating to the reach of target population	Semi-structured interviews Country case studies Thematic case studies	Annual Performance reports Member States programmes Thematic Facility Work Programmes Annual Performance reports, any other

Evaluation Question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	communication activities			project/ Programme reporting
	Dissemination activities reach the target audience and are carried out through an appropriate mix of communication channels and platforms, including social media, and generate interactions			
	Funding opportunities are adequately advertised and reach the identified target population of potential beneficiaries	Identification of strategies / means used to advertise funding opportunities	Semi-structured interviews Country case studies Thematic case studies	Annual Performance reports Mid-term evaluation (where available)
		Development of the number of funding applications over the years and identification of calls that did not lead to a sufficient number of applicants	Thematic case studies	Mid-term evaluation (where available)
		Assessments of stakeholders on the visibility of the fund and related funding opportunities and challenges in this regard	Semi-structured interviews Country case studies	

Relevance

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
EQ11: To what extent does the Fund address the evolving needs ?	The Fund stakeholders are correctly identified in line with the objectives established in the legal basis	Share of consulted stakeholders that consider all relevant stakeholders are correctly identified considering the objectives of the Fund	Semi-structured interviews Country case studies	

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
			Thematic case studies	
	The milestones and targets planned address the most relevant needs with proportionate resources	Share of consulted stakeholders that consider the distribution of resources are in line with their needs	Targeted survey Country case studies	
	The list of implementation measures included in the legal basis and planned within the fund is suitable to address emerging needs	The extent to which the measures planned are suitable to address emerging needs Share of stakeholders that consider the measures planned address the emerging needs of target population	Semi-structured interviews Targeted survey Country case studies Thematic case studies	
	The work Programme of the thematic facility focuses on the key priority needs and key target populations	The extent to which Thematic Facility actions consider additional target populations and needs that are not fully covered by the other Fund components	Thematic case studies	
EQ12: To what extent can the Fund adapt to the evolving needs ?	A needs assessment is performed and updated on a regular basis or whenever there are relevant contextual changes	The extent to which at Member State level update of need assessments has been performed and updated following relevant contextual changes The extent to which at Thematic facility level update of need assessments has been performed and updated following relevant contextual changes	Targeted survey with national authorities Semi-structured interviews	

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
			Country case studies Thematic case studies	
	The partnership / monitoring committee is able to provide timely input on evolving needs and relevant developments on the ground	The extent to which the consulted stakeholders consider the monitoring committee has been able to provide inputs on evolving needs and relevant developments on the ground Share of Member States that keep track of the level of implementation of the inputs provided by the committee	Targeted survey for national authorities Country case studies	Mid-term national evaluations (where available)
	There is an adequate degree of flexibility in the design of the operations Procurement procedures from the COM ensures flexibility facilitate the bottom-up feedback	Types of measures taken to ensure flexibility Share of consulted stakeholders that consider the implemented measures were effective in ensuring flexibility in the design of the projects, call for proposals, procurement procedures	Targeted survey Country case studies Thematic case studies	Work Programmes
	Non substantial changes to the MS Programme were applied swiftly	Number of changes to the MS Programmes Share of consulted stakeholders that consider that non substantial changes were applied swiftly	Semi-structured interviews Country case studies	Member States Programmes Mid-term evaluations (where available)

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	Rules and procedures have been established to ensure that substantial adjustments to the Fund can be implemented in a timely manner should new needs arise	Types of existing rules and procedures that ensure that substantial changes can be implemented Share of consulted stakeholders that consider substantial changes can be implemented should new needs arises	Semi-structured interviews Country case studies Thematic case studies	Thematic Facility Work Programmes Mid- term national evaluations (where available)
	If there have been changes in the needs after the fund adoption the new needs have been duly addressed via the thematic facility The Thematic Facility allows to address new developments or priorities at EU level in an efficient manner	Share of consulted stakeholders that consider the Thematic Facility actions addressed new needs which emerged after the Fund adoption Share of consulted stakeholders that consider the Thematic Facility measures were efficient in the management of new developments/ emergency situations EU level	Semi-structured interviews Thematic case studies	

Efficiency

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
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	Financial allocation per Member State per types of actions Level of achievement of outputs/ results indicators per type of actions Absorption rate per Member State and overall	Country case studies	SFC 2021

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	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.)			
	For highly specific, emergency or innovative actions supported via direct or indirect management, appropriate mechanisms exist which ensure that cost-effectiveness is reviewed as a criterion to select the beneficiary	The extent to selection criteria for projects considers the level of cost-effectiveness	Semi-structured interviews Country case studies Thematic case studies	
	The EMAS allows to address urgent and specific needs in a swift and sufficient manner	Share of consulted stakeholders that consider EMAS actions allowed to address urgent and specific needs Assessment of the needs for EMAS and comparison to the scope of EMAS, identification of gaps / needs that were not possible to address	Semi-structured interviews Thematic case studies	
EQ7: To what extent is the management and control system efficient?	The management and control system, described as per the legal basis, aims to ensure efficiency in the selection of operations, management tasks, work of the monitoring committee, implementation of anti-fraud measures and procedures, fulfilment of accounting function and recording and storing of data on each operation	Number of mechanisms in place at MS level to report, detect and prevent fraud and irregularities and assessment of the effectiveness of these measures (where possible, analysed by country e.g. for the case study countries)	Country case studies	
		Number of follow up cases of fraud and other irregularities (where possible, analysed by country)	Country case studies	
		Identification for each category of stakeholders (i.e Managing Authorities, Intermediate Bodies, beneficiaries and end-users) the following:	Semi-structured interviews Country case studies	Mid-term national evaluations

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
		- source of costs (activities for which they are responsible based on the Regulations); - costs to comply with the Regulation.	Thematic case studies	(where available)
	The administrative burden is proportionate for all implementing actors (Managing Authorities, Intermediate Bodies), compared to the previous programming period/ similar services offered to comparable target population without the support of the fund The administrative burden is proportionate for all beneficiaries, compared to the previous programming period/ similar services offered to comparable target population without the support of the fund The administrative burden is proportionate for all end-users, e.g. compared to the previous programming period/ similar services offered to comparable target population without the support of the fund Absence of 'gold-plating' at the national level (e.g. from Managing Authorities, Intermediate Bodies, national Audit Authorities), i.e. requirements are not interpreted more restrictively than the legal basis or relevant documents providing methodological advice to the Member States and unless a justified reason exists Absence of 'gold-plating' at the EU level, i.e. requirements are not interpreted more restrictively than in the legal basis and unless a justified reason exists Simplified cost options used create simplification on the ground There is evidence of legal requirements, rules of procedures or practices that create	Share of consulted stakeholders that perceive as burdensome in the implementation aspects such as: procurement procedures, regulatory requirements, monitoring requirements, communication with other stakeholders involved in the implementation, obtaining guidance and support	Targeted survey Semi-structured interviews	

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	disproportionate administrative burden at the EU or MS level, and concrete alternatives exist There is evidence of lack of coordination between the actors involved in the implementation of the fund, resulting in e.g., lack of coherence, increased administrative burden, etc			
		The extent to which simplification measures were used (e.g., simplified cost options) into the MS Programmes	Targeted survey Semi-structured interviews Country case studies	Member States Programmes Mid-term national evaluations (where applicable) SFC2021
		Perception of the consulted stakeholders on the effectiveness of the simplification measures used in the implementation of MS Programmes	Country case studies	
	Technical assistance is used to strengthen the management and control system when necessary	Assessment of the overall resources (human and financial) allocated to technical assistance ⁸⁵ in the MS Programmes	Country case studies	Member States programmes Mid-term national evaluations (where available)
		The extent to which the consulted stakeholders consider the technical assistance is used to strengthen the management and control system	Semi-structured interviews Country case studies	
		Number of Full Time Equivalent in the Managing Authorities, Intermediate Bodies working on the implementation of AMIF and paid by the technical assistance or national	country case studies	Mid-term national evaluations

⁸⁵ The degree to which it will be possible to check this for all or a selection of Member States (e.g. the countries selected for the case studies) will be checked following the submission of this inception report.

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
		budgets as compared to the number of projects implemented and to the amount of the funds claimed for the financial year ⁸⁶		(where available) SFC2021
EQ8: To what extent is further simplification achievable? How?	There is room for additional use of simplified cost options and financing not linked to costs options	Share of consulted stakeholders that consider there is room for additional use of simplified cost options and financing not linked to costs options	Targeted survey (applicable) Semi-structured interviews Country case studies	
	There are issues with the electronic data exchange systems that create delays and can and should be addressed	Share of consulted stakeholders that encountered difficulties in reporting and introducing data in the electronic data exchange systems, Type of difficulties encountered by the Stakeholders in introducing data in the electronic data exchange systems and mitigation measures	Semi-structured interviews Country case studies	

Coherence

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
EQ9: To what extent is the fund coherent with initiatives supported under its policy domain, in particular with support	The complementarity between MS Programmes and Thematic Facility or other EU funds was assessed in the programming phase	Number of MS that assessed the complementarity of the Fund with other National and EU funds	Country case studies Targeted survey	Annual Performance reports

⁸⁶ The degree to which it will be possible to check this for all or a selection of Member States (e.g. the countries selected for the case studies) will be checked following the submission of this inception report.

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
under the thematic facility across the different management modes				Member States programmes
	The fund is coherent with the objectives of the current policy agendas at EU and national levels	The extent to which the initiatives under the thematic facility, and MS Programmes are complementary with other interventions at the national level, e.g. based on the identification of synergies, contradictions and overlaps	Semi-structured interviews Targeted survey Country case studies Thematic case study	Mid-term national evaluations (where available)
	There is evidence of inter- and intra-agency cooperation ⁸⁷	Type of inter and intra-agency cooperation in the operations funded by the MS Programmes and thematic Facility	Semi-structured interviews Country case studies Thematic case studies	MS Programmes Annual Performance reports Thematic Facility Programmes
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?	Structures, organisational arrangements or coordination mechanisms have been in place which ensuring coordination, complementarities and, where relevant, synergies across other EU funds, in particular cohesion policy and EU's external action	Number of MS that have in place coordination mechanisms between the Fund and other national or European funds		Member States programmes Mid-term national evaluations (where available)

⁸⁷ This includes e.g. cooperation between the Member States at the EU level, and between Member States and relevant EU bodies, offices and agencies, as well as cooperation at national level among the competent authorities within each Member State.

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	Coordination mechanisms at programme level are used regularly and ensure the interventions do not overlap			Annual Performance reports
		Share of stakeholders that consider the coordination mechanism as adequate to generate synergies across other EU funds	Targeted survey Semi-structured interviews	Mid-term national evaluations (where available) Annual Performance reports
	Any identified overlaps are justified on objective grounds (e.g., the same target population is addressed, but different types of measures / a different need are addressed)	The extent to which the MS Programmes, Thematic Facility are complementary with other interventions at national level and other EU policy	Semi-structured interviews Country case studies Thematic case studies	Member States Programmes Mid-term national evaluations (where available) Thematic Facility Work Programmes
		Percentage of consulted stakeholders who considered that existing overlaps have been justified on objective grounds	Semi-structured interviews	Member States Programmes

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
			Country case studies Thematic case studies	

EU Added Value

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
EQ13: To what extent is the fund generating EU added value?	When relevant, there is evidence of leverage effects and/ or positive spillovers	The extent to which the Thematic Facility and MS Programme actions produced spillover effects e.g. impacts on a target population who was not targeted initially), including also the evidence based on stakeholders' view; The extent to which the Thematic Facility addressed new developments or priorities at national and EU level in a swift and appropriate manner, including evidence based on stakeholders' view	Targeted survey	Annual Performance reports Previous EU and MS level evaluations and assessments Literature from EU institutions and relevant migration organisation
	There is evidence of scope effects, i.e., of additional target population addressed or additional types of intervention offered	Types of additional target population compared with the initial targeted groups, if possible, at the level of all MS Programmes and Thematic Facility operations	Targeted survey Country case studies Thematic case studies	Annual Performance reports Mid-term national evaluations (where available)

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
				Thematic Facility Work Programmes EASO reports
	There is evidence of scale effects, i.e., of a higher volume of services offered/end-users addressed	Types of additional actions per target group, compared with the initial targeted operations, if possible, at the level of all MS Programmes and Thematic Facility	Semi-structured interviews Country case studies Thematic case studies	Annual Performance reports Member States evaluations
	There is evidence of function effects, i.e., of learning and increased capacity to manage the provision of public support within the administrations involved	Share of stakeholders that consider the technical assistance provided through the MS Programmes increased the capacity to manage the provision of public support	Targeted survey Semi-structured interviews	Mid-term national evaluations (where available)
	The thematic facility addresses priorities with a high Union added value	Share of consulted stakeholders that consider the migration crises or the collaboration with third countries could have been managed without the support of the Thematic Facility	Thematic case studies Semi-structured interviews	Thematic facility Work Programmes Research and Studies, grey and academic literature
	There is no evidence of dependency, i.e. of systematic lack of investment based on national resources for relevant services that are provided entirely	Amount of national funds available for similar objectives	Country case studies Semi-structured interviews	

Evaluation question	Judgment criteria	Indicator / Descriptor	Primary source	Secondary source
	through support from EU funds			

ANNEX IV. OVERVIEW OF BENEFITS AND COSTS

Consistent with the Better Regulation Toolbox #56 and #57, table 2 below provides a **proportionate overview of the costs and benefits entailed by the fund**. This table has been completed based on the information gathered during the study supporting the mid-term evaluation of the AMIF 2021-2027.

The **quantitative data on AMIF funding and national contributions** stems from the transmission of data from SFC2021 (as of 30 June 2024) as well as data on Union Actions and Emergency Assistance (EMAS) from and outside of COMPASS (as of 30 June 2024).

Quantitative estimates for direct compliance costs and enforcement costs for administrations and for beneficiaries of the AMIF are based on responses to the targeted survey, conducted as part of the evaluation study, as well as on anecdotal evidence from semi-structured interviews with stakeholders.

Table 2: AMIF 2021-2027 cost and benefits analysis

Cost or benefit		Citizens / Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
AMIF funding ⁸⁸	One-off					Appr. 3.6 billion EUR	AMIF budget allocated to operations under shared, direct and indirect management.		
National contributions ⁸⁹	One-off					Appr. 823 million EUR	MS contributions allocated to operations under shared management (MS programmes and Specific Actions).		

⁸⁸ Committed resources, i.e. committed AMIF budget allocated to actual operations. Source: Table 3, TOD from SFC2021 (June 2024); EMAS and UA data from and outside of COMPASS (June 2024).

⁸⁹ Committed resources, i.e. committed national contribution allocated to actual operations. Source: Table 3, TOD from SFC2021 (June 2024).

Cost or benefit		Citizens / Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
Direct compliance costs ⁹⁰	One-off					Appr. 175 to 350 million EUR	The estimate is based on the AMIF budget allocated to Technical Assistance, as an approximation for direct compliance costs. ⁹¹		
	Recurrent					Preparation of direct awards and Calls: appr. 6 to 30 man-days per award/ call per MS Screening of applications: appr. 6 to 20 man-days per call per MS	Evidence on the direct compliance costs for authorities is very limited, based on responses to the targeted survey provided by 11 national authorities. ⁹²		<i>Direct compliance costs for beneficiaries:</i> Regulatory requirements as well as procurement procedures were each perceived as a challenge by >50% of surveyed beneficiaries. ⁹³ Despite some improvements

⁹⁰ Adjustment costs, administrative costs, regulatory charges.

⁹¹ The planned resources for Technical Assistance of 350 million EUR (Source: Table 6, TOD from SFC2021, June 2024) are taken as a ceiling estimate for direct compliance costs of national authorities. The lower bound of 175 million EUR represents a best estimate which could not be verified. While EU contributions for Technical Assistance can be used for more than adjustment costs and administrative costs, there are likely to be additional direct costs borne by national authorities for which no data is available. Funding for Technical Assistance, as defined in Article 36(5) of Regulation (EU) 2021/1060, is allocated to actions necessary for the effective administration and use of AMIF funds, including for capacity building, as well as functions such as preparation, training, management, monitoring, evaluation, visibility and communication.

⁹² Quantitative estimates were made based on the responses provided for the time spent on the preparation of funding and the screening of applications, which varied significantly across respondents.

⁹³ Survey question: “To what extent were the following aspects perceived as a challenge by your institution / organisation / company in the implementation of the project(s) funded by the MS Programme AMIF?” (Q30; N=138)

Cost or benefit		Citizens / Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
									due to more use of simplification measures, beneficiaries of the AMIF still perceive the administrative costs of the AMIF as substantial.
Enforcement costs ⁹⁴	One-off	n/a							
	Recurrent					Monitoring: appr. 2 to 10 man-days per year per MS Reporting: appr. 50 man-days per reporting year per MS Auditing: appr. 3 man-days for one on-the-spot control per MS	Evidence on the enforcement costs for authorities is very limited, based on anecdotal evidence provided by two national authorities. ⁹⁵		<i>Enforcement costs for beneficiaries:</i> Monitoring requirements were perceived as a challenge by 55% of surveyed beneficiaries. ⁹⁶
Indirect costs ⁹⁷	One-off								<i>Indirect costs for beneficiaries:</i> Anecdotal evidence from a large beneficiary organisation suggests that the fulfilment of

⁹⁴ Costs associated with activities linked to the implementation of an initiative such as monitoring, inspections, and adjudication/ litigation

⁹⁵ Responses from other authorities suggest that more man-days were spent for auditing per on-the-spot control or per project, which is likely due to the varying sizes of projects.

⁹⁶ Survey question: "To what extent were the following aspects perceived as a challenge by your institution / organisation / company in the implementation of the project(s) funded by the MS Programme AMIF?" (Q30; N=138)

⁹⁷ Compliance costs or other indirect costs such as transaction costs

Cost or benefit		Citizens / Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
									reporting and monitoring requirements ties up resources, thereby causing indirect costs. ⁹⁸
	Recurrent	n/a							
Direct benefits	-		Direct support facilitates access to essential services for target groups.				Direct support through AMIF funding via Union Actions, Emergency Assistance and Technical Assistance.		Direct support through the AMIF funding of projects in the field of asylum, migration and integration.
Indirect benefits	-		Actions aimed at enhancing the integration of migrants ultimately benefits social cohesion in Member States.		Actions aimed at the integration of migrants facilitate their entry into the labour force of EU Member States.		Support in the management of migration and the achievement of policy objectives in the field of asylum, migration and integration. It can further be assumed that there are efficiency gains in the delivery of funding for asylum, migration and integration in Member States. ⁹⁹		Apart from direct support for the measures of beneficiaries, AMIF funding enables organisations to engage in the field of asylum, migration and integration, further contributing to societal acceptance national and EU policies.

⁹⁸ Such indirect costs to beneficiaries can in some cases lead to a temporary reduction of services to the target groups.

⁹⁹ This qualitative reasoning is based on the findings of the ex-post evaluation of the AMIF 2014-2020.

ANNEX V. STAKEHOLDERS CONSULTATION - SYNOPSIS REPORT

The consultation strategy for this mid-term evaluation included semi-structured interviews, two focus groups and targeted surveys. The objective of the consultations was to collect relevant information and insights on the effectiveness, efficiency, coherence, EU added value and relevance of the AMIF, as well as to collect inputs on lessons learned. To do so, a wide range of EU, international and national level stakeholders were consulted.

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. Eight contributions were received ⁽¹⁰⁰⁾:

- The Red Cross EU office provided a series of points regarding:
 - In a number of Member States, AMIF is a core funding instrument and this makes projects dependent on funding cycles, thereby affecting the sustainability of a project particularly in the period between funding cycles.
 - Greater flexibility in the target group that benefit from the fund would ease the Red Crosses ability to provide services.
 - Efforts should be made to improve civil societies and humanitarian organisations access to AMIF funds.
 - The Thematic Facility work programmes should ensure predictability regular calls, for example calls concerning the exchange of best practices.
 - The need to allocate greater resources to EMAS under the 2021-2027 programming period.
 - Possibilities to ease reporting requirements under AMIF should be explored.
 - Calls for applications under Union Actions should consider longer deadlines.
 - It is considered a good practice for the main AMIF implementing partners to be included in the Member State monitoring committees and should be further encouraged.
- International Rescue Committee (IRC) stated appreciation for AMIF's contribution to innovation and mutual learning. They expressed that longer grant periods would

⁽¹⁰⁰⁾ [Asylum, Migration and Integration Fund \(AMIF\) for 2021-2027 – mid-term evaluation](#)

increase impact. They demonstrated concern that projects to support beneficiaries of temporary protection reduced support to other refugee populations.

- The European offices of the Bavarian, Baden-Württemberg and Saxony municipalities suggest that to increase and ease the participation of municipalities, virtual information sessions should be offered, the requested financial contribution should be reduced, and calls for applications should be streamlined.
- The European Council on Refugees and Exiles provided a series of points regarding:
 - Increasing the participation of civil society organisations in the Member States AMIF monitoring committees and greater transparency around the monitoring committee's selection procedure and work.
 - Increasing transparency of the arrangements for reporting cases of non-compliance with the Charter of Fundamental Rights of the European Union to the Member State AMIF monitoring committees.
 - Considering establishing a legal requirement that 30% of AMIF funds reach civil society organisations to increase efficiency and increase the participation of civil society organisations.
 - Greater efforts should be made to ensure coherence of the AMIF resources dedicated to the external dimension.
- The Government of the Canary Islands expressed increasing the participation of regional authorities is essential, one suggestion is to make it easier for regional authorities to benefit from direct management. They also suggest a revision of the result indicators to be more realistic and reflective of projects concerning unaccompanied minors.
- Oxfam Italia stated the Thematic Facility work programmes do not clearly communicate which calls for proposals will be launched in 2024 and the budget envelop per call.
- A private citizen reiterated the objectives of the mid-term evaluation.
- FAIRWORK Belgium expressed appreciation for the inclusion of support to exploited workers without legal residence in the scope of support in AMIF for the 2021-2027 programming period.

Interviews

Overall, 89 interviews were conducted as part of the study. The interviews that were conducted during the data collection phase fed into answering the evaluation questions, as well as into the development of the country and thematic case studies.

The table below provides an overview of the number of interviews conducted by activity as well as the types of consulted stakeholders and the objectives of the different interviews conducted.

Table 3: An overview of the interviews conducted during the study

Interviews by activity	Type of consulted stakeholders	Objectives
Scoping interviews (7)	DG HOME (6): Funds coordinators (Unit E1, E2, E3); Union actions (E4); Specific Actions (E3); Irregular Migration, Returns and Readmission sector (Unit C1), Legal Pathways and Integration (Unit C2), Asylum Policy (Unit C3) Managing Authority (1): IT	To deepen the understanding of the functioning of the AMIF, and to finetune the methodological approach
Review of a sample of target setting methodologies (10)	National Managing Authorities (10): DE, IT, AT, EL, LT, NL, FR, SE, PL, RO	To gather information on the methodologies used by Managing Authorities to establish their targets for the 2021-2027 period
Semi-structured interviews (14)	National /Managing Authorities (10): IT, BE, CZ, EL, ES, HU, PT, NL, SE, PL, CY DG REGIO (1) EU agencies (2): EUAA, FRA.	To gather strategic and operational information about the AMIF implementation, including considerations related to its impacts and added value
Country case studies (40)	National Managing Authorities (DE, EL, FR, IT, LT, RO) Project representatives and beneficiaries Research and civil society organisations	To identify and discuss potential specific factors and processes that are crucial for the success of the AMIF implementation To identify how AMIF is being implemented both by governmental and non-governmental stakeholders. To investigate the current state of funding in specific countries with special emphasis on the extent to which and the reasons why the funding was particularly effective, efficient etc. (or not).
Thematic case studies (18)	Beneficiaries and project representatives for:	To gather granular evidence on the portfolio of projects

Interviews by activity	Type of consulted stakeholders	Objectives
	Union Actions (2) EMAS (3) Ukraine (4) Specific Actions (5) Horizontal priorities (4)	under the specific types of the components and programmes of the Fund, identifying innovative approaches and projects, good practices, key drivers and barriers towards achieving specific objectives and results, and lessons learned

Source: The consortium

Overall, the interviews conducted during the study helped assess how effectively the AMIF framework is progressing towards its goals of enhancing national capacities, improving migration management, and promoting responsibility sharing between Member States. Consulted stakeholders provided a positive evaluation of the fund's effectiveness and efficiency in meeting its objectives. They noted that AMIF is successfully addressing evolving needs, while aligning with both internal and external initiatives. In addition, consulted stakeholders highlighted the significant EU added value that AMIF brings to addressing issues and crisis that national funds alone cannot effectively tackle.

However, acknowledging the fund's effectiveness, the stakeholders interviewed expressed concerns about some challenges hindering and slowing down AMIF's implementation. Among these challenges, unexpected crisis and migration flows, delays in the initial funding provision, and high administrative costs. Lastly, while there is an administrative burden associated with performing changes to the AMIF projects at the time of implementation, consulted stakeholders noted a high degree of flexibility within the AMIF framework. The next sections cluster the findings of the interviews according to the different evaluation criteria (e.g. effectiveness, efficiency, coherence, relevance, EU added value).

EFFECTIVENESS

Overall, the fund seems to be on track in achieving its operational and specific objectives. For instance, 34 consulted stakeholders (17 MA, nine beneficiaries, five projects' representatives, three CSOs) indicated progress in achieving objectives and targets for projects funded by AMIF during the 2021-2027 programming period. Nonetheless, several challenges hampering or slowing down the implementation progress have been identified by the majority of consulted stakeholders. Uncertainty about responsibilities sharing among the different authorities involved in the projects, as well as the delayed funding provision compared to the expected date of delivery caused delays in the projects' launch.

Despite the overall positive assessment in terms of effectiveness of the AMIF, a consulted project representative stressed that the current structure of AMIF calls for projects, characterised by detailed requests and tight time constraints, limits the ability of smaller organisations with limited staff to participate effectively. In addition, the small budget

provided through co-funding presents a challenge for these organisations, further restricting their capacity to engage in the process. However, the interviewee did not specify whether these considerations refer to direct or shared management.

Experiences related to the monitoring and evaluation framework and the extent to which the latter is suitable to inform on the progress towards the achievement of AMIF objectives are mixed. While two MA are still finalising the development of their monitoring mechanisms, 19 consulted stakeholders believed it to be to a good extent appropriate to effectively assess the fund's objectives. Four stakeholders (two MA, one CSO and one beneficiary) even emphasised the improvement of common indicators' definition and clarity in comparison to the previous programming period. Other consulted stakeholders seemed to be less satisfied with the existing monitoring mechanisms' scope and effectiveness, while one CSO was not at all aware of the existence of a monitoring mechanism. Even when providing an overall positive assessment of the monitoring mechanisms' effectiveness, four MA stressed the current IT system's limitations, considering it outdated and non-comprehensive.

Partners are highly involved across all stages of the programming, implementation, monitoring and evaluation of AMIF. Indeed, 13 MA, as well as two CSOs, five beneficiaries and one representative of a research centre/think tank or academia reported that all relevant partners and stakeholders (e.g. beneficiaries, CSOs, IOs, local and regional authorities) participate in AMIF national monitoring committees. Notably, four MA and one representative of a research centre/think tank or academia emphasised that MA in their Member States hold meetings more frequently than the required annual meeting, while some maintain constant exchanges with relevant partners.

According to 16 consulted stakeholders, effective collaboration and involvement of partners and beneficiaries in AMIF projects is ensured by effective communication and dissemination of opportunities and achievements. Eight MA reported that they communicate constantly with beneficiaries through electronic channels and provide beneficiaries with guidance, ad-hoc seminars, trainings, and workshops. Information about AMIF achievements is disseminated to the wider public in the form of reports or information campaigns material (e.g. posters, flyers) through mailing lists, websites, social media, TV and radio spots, or dedicated notice boards.

Regarding the respect of horizontal principles, most consulted stakeholders highlighted that there is a clear obligation outlined in the AMIF call. However, when it comes to the implementation of AMIF projects, stakeholders highlighted the lack of a mechanism specifically tracking funding allocations for these horizontal principles (e.g. for digital transition or green initiatives).

EFFICIENCY

17 consulted stakeholders believe AMIF funded measures to be cost-effective and one stakeholder even featured an improvement in terms of efficiency compared to the former programming period. The use of simplified cost options and measures of simplification have been emphasised by five MA as positively fostering efficiency. However, most stakeholders believe further simplification to be possible and four MA mentioned their impossibility to quantify or assess the cost-effectiveness of AMIF-funded projects. Moreover, one stakeholder even lamented the limited role of the Commission in elaborating simplified cost options, as it does for other funds (i.e. ESF).

Despite assessing the management and control system as efficient overall, five MA highlighted an increase in the administrative burden compared to the previous programming period, due, for example, to the complexity of the Common Provision Regulation (CPR), or the reporting requirements. As a matter of fact, significant administrative costs linked to the reporting mechanisms were reported to cause delays in the projects' implementation by seven consulted stakeholders. In particular, one project representative explained that the transition to the electronic systems has increased the administrative burden, creating data reconciliation challenges between the old non-electronic and the new electronic data. Only one stakeholder stated that administrative costs have decrease due to simplified cost options. Overall, most inquired authorities convened that there is great room for further simplification. Suggestions to enhance efficiency entail the simplification of applications; enhance clarity; reduce reporting requirements; differentiate requirements according to the scope of the project, particularly reducing requirements for small projects; allow interoperability between the national information systems and SFC systems.

COHERENCE

According to 12 Managing Authorities, three beneficiaries, two CSOs, two project representatives, one representative of a research centre/think tank or academia, and two EU-level stakeholders, the AMIF allows to establish good synergies among policies and projects under the same policy domain, while avoiding duplication with national projects and initiatives. For instance, one MA even highlighted that AMIF projects, specifically Specific Actions and EMAS, tend to be more competitive than national projects with similar objectives due to the rapid availability and flexibility of the AMIF. In addition, four MA emphasised coherence and successful cooperation of MA and/or beneficiaries with EU agencies (e.g. EUAA and Frontex), while seven other consulted stakeholders reported good complementarity with other DG HOME (e.g. ISF, BMVI) and, more generally, EU funds (i.e. ESF, Next Generation EU).

Nonetheless, one EU-level stakeholder pointed out that discussions on duplication are ongoing, implying that it may occur to some extent. Additionally, two MA voiced the possibility of further enhancing existing synergies. Four MA suggested that this could be achieved, for instance, by conducting joint calls (at present not available for AMIF but feasible for other funds).

RELEVANCE

According to 39 consulted stakeholders, the AMIF effectively addresses the needs of the target groups. 17 stakeholders (13 MA, one representative of a research centre/think tank or academia, one project representative, one beneficiary, and one EU-level stakeholder) stated that the needs assessment effectively identifies the needs of target groups, mainly thanks to the authorities' holistic approach and the broad scope enabled by the involvement and repeated interaction and cooperation with a wide variety of relevant stakeholders (e.g. beneficiaries, NGOs, IOs, local and regional authorities). Only one MA and one CSO reported that needs assessment was, according to them, unnecessary due to the wide and holistic involvement of stakeholders and beneficiaries, and their regular consultations providing sufficient information to identify evolving and new emerging needs, rendering the replication of formal needs assessments unnecessary. Despite the overall positive assessment, two CSOs and one project representative highlighted that the AMIF fails to address specific needs of some vulnerable groups (e.g. people who require repatriation but

lack a valid residence permit and, thus, cannot benefit from integration services or repatriation assistance).

In a similar manner, AMIF is flexible and able to adapt to evolving needs according to 20 MA, three CSOs, three beneficiaries, one project representative, and one representative of a research centre/think tank or academia. In particular, six MA reported that needs assessments are regularly performed, and beneficiaries consulted to identify new arising needs. Situations where AMIF demonstrated a significant degree of flexibility entail the Russian Aggression of Ukraine (mentioned by 10 MA, one EU-level stakeholder, and one beneficiary), the situation in Afghanistan (highlighted by one MA, one EU-level stakeholder, and one beneficiary) and the newly adopted Pact on Migration and Asylum (identified by two MA, and four EU-level stakeholders). Regarding the Pact, DG Home considers the AMIF to be the appropriate mechanism for its successful and timely implementation. However, one stakeholder highlighted that the Pact's implementation is hampered by the lack of available resources under the AMIF left to be allocated to it.

Despite a formal significant degree of flexibility, two MA, one beneficiary, and one CSO stressed the administrative burden linked to such changes, that de facto limits the flexibility of AMIF. Similarly, according to two consulted stakeholders, the strict rules in the CPR¹⁰¹ hamper the ability to adjust the design of operations and actions at the time of implementation.

EU ADDED VALUE

The AMIF brought remarkable added value, allowing the realisation of projects and actions that could have not been achieved through national funds alone or that would not have been carried out due to not representing pressing priorities to single Member State, as highlighted by 34 consulted stakeholders (19 MA, three CSO, four project representatives, five beneficiaries, two EU-level stakeholders, and one representative of a Research centre/think tank or academia). Two consulted stakeholders emphasised that the AMIF allows to keep national asylum policies aligned with the Union's policies, enabling the provision of a common response to asylum. In addition, two MA stressed the substantial role of AMIF to enable responses and actions in times of great pressures or crisis.

First EU-level focus group

The first EU-level focus group was held on 25 June in Brussels, gathering participants from eight Managing Authorities (AT, BG, EE, DE, IT, NL, SK, SE) and 21 beneficiaries, with the aim of gathering preliminary evidence on AMIF implementation challenges and good practices related to the AMIF four specific objectives.

After a brief presentation of the study, two breakout sessions were organised to hold thorough discussions on: 1) challenges hampering the successful AMIF implementation, particularly focusing on programming and selection, implementation, monitoring, and communication; and 2) good practices and policy issues with respect to four SOs of the Fund (i.e. SO1, SO2, SO3, SO4).

The first breakout session highlighted several key insights, offering a deeper understanding of both challenges and positive aspects associated with AMIF implementation.

¹⁰¹ Regulation (EU) 2021/1060.

Firstly, with regard to the programming and selection of projects, both beneficiaries and Managing Authorities noted that applications for AMIF projects are sometimes too cumbersome and not clear enough. As for implementation, Managing Authorities stressed the importance of focusing on the use of simplified cost options to enhance implementation, while both Managing Authorities and beneficiaries highlighted that the use of unit costs has streamlined project implementation and reporting. Nonetheless, beneficiaries also highlighted that unit costs are hardly adjusted against inflation and that the related reporting requirements, though streamlined, are quite time-consuming.

No major issues were highlighted concerning monitoring, except for limited involvement of relevant partners in the Monitoring Committees featured by Managing Authorities. As for managing controls, beneficiaries stressed the need to prioritise the achievement of project results and objectives, rather than strict adherence to the initial project proposal.

Lastly, beneficiaries and Managing Authorities noted that there is limited visibility of AMIF projects and their impact, despite the overall increase of budget allocated to communication activities.

Among the main outcomes of the second break-out session on AMIF SOs, beneficiaries noted that AMIF's contribution through SO2 is pivotal, as it enables Member States to fund what they would not be able to fund otherwise. As for SO3, beneficiaries suggested that irregular migration should be covered by other Home Affairs Funds instead (e.g. ISF) and that AMIF should focus more on aspects related to integration. No issues emerged with regard to SO4, with beneficiaries noting that since the 2014-2020 programming period there have been improvements in terms of the relevance of AMIF projects related to migrants sharing capacities and overall EU solidarity.

Overall, throughout the focus group the EU added value of AMIF was highlighted by both Managing Authorities and beneficiaries. Beneficiaries further added that AMIF plays a pivotal role at the national level as no other national initiatives allocate enough funding on the same policy priorities. As noted by participants, AMIF provides legitimacy to the projects carried out at the grass-root level in the field of migration and asylum.

Second EU-level focus group

A second EU-level focus group was held online through Microsoft Teams on 12 December 2024. This focus group gathered 13 participants from:

- **EU Commission (6):** DG HOME (unit E1, E2, E3, E4, C2) and DG EMPL (Unit G5);
- **EU Agencies (3) :** EUAA (2), FRA (1);
- **Managing Authorities (4):** DE, FR, IT, PL;

The focus group had a twofold objective of: (i) **Validating the findings of the study**, particularly in view of potential factual mistakes, thus allowing the Team to fine-tune the evaluation results, and (ii) discussing the **challenges identified and the design of lessons learned**, based on the inputs provided by the Team, including their prioritisation.

The focus group was organised in **two plenary sessions**.

The **first session** was devoted to the presentation of the study, followed by a Q&A session. During this Q&A, participants asked for some clarifications on the evaluation findings, and highlighted new elements to be taken into consideration in the evaluation of AMIF, such as the following (each of these points has been integrated in the list of challenges and lessons learned in section 5):

- As concerns the **partnership principle**, DG HOME explained that, to their understanding, local authorities and some CSOs do not believe that there has been a significant degree of inclusion, for instance in the Monitoring Committees. Together with one Managing Authority (MA), DG HOME suggested to **account for the variance of relevant stakeholders across Member States** when considering the partnership principle.
- DG HOME and one MA stressed that the possibility of ensuring swift adaption of Member States programmes may be hindered not only by the Commission's delay in the approval of amendments, but also by MAs delays, e.g. due to internal discussions or to administrative burdens at national level connected to amendments.
- One MA explained that the current set-up of reporting adds complexity and should be taken into account as a challenge that needs to be addressed through further simplification.
- DG HOME noted that several findings of the supporting study fail to distinguish between the impact of the **CPR rather than the AMIF Regulation**. Firstly, DG HOME suggested to reflect on the **connection between CPR and AMIF and the extent to which changes in the management of the Member States programmes in the 2021-2027 programming period have been triggered by CPR requirements**. For example, with regard to communication, DG HOME raised whether the improvement in communication was due to Art. 48 and Art. 49 of the CPR, which foresee specific obligations for Member States to comply, or if this is stemming from overall improvement in the management of AMIF. Similar questions were raised about the management and control systems, which are aspects embedded in the CPR. Secondly, DG HOME suggested to **reflect strictly on the link between horizontal principles and the CPR**, which prescribes horizontally enabling conditions partially overlapping with the horizontal principles. For example, Member States must enforce measures to comply with the horizontal enabling condition related to the correct implementation of the Charter of Fundamental Rights.

The second plenary consisted of an interactive, co-design workshop.

Firstly, the Study Team presented an overview table displaying the challenges identified in the study clustered into three groups according to their degree of urgency (i.e. low, medium and high), and asked the participants to complement the table with additional challenges, modify the existing ones, or change the associated degree of urgency.

Secondly, an interactive discussion on the design of lessons learned took place starting from inputs already provided by the Team leading the supporting study. More precisely, the participants were asked to provide feedback on the lessons learned already identified, and to propose additional recommendations and assess their degree of feasibility (i.e.

specifying whether each lesson learned / recommendation was highly feasible, moderately feasible or hardly feasible). The discussion unfolded starting from the challenges accounted as most urgent in the previous discussion, to follow with moderately urgent challenges, and to conclude with the least urgent ones. Overall, while most recommendations presented in the study were maintained as originally proposed, others were discarded and replaced with alternative suggestions, and a limited number of new recommendations were introduced.

Targeted surveys

Objectives and scope

The purpose of the targeted surveys conducted between August and September 2024 was to gather feedback from National/Managing Authorities (NAs/MAs)¹⁰² involved in the planning, monitoring, and assessment of AMIF measures, as well as from organisations, institutions, or companies participating in their implementation (i.e., beneficiaries).

It concentrated on aspects such as relevance, coherence, effectiveness, efficiency, influencing factors, sustainability of observed effects, and the EU added value provided by the implemented measure over both programming periods (2014-2020 and 2021-2027). Furthermore, the survey examined how eligible measures under all AMIF components (National/Member State programmes, Union Actions, and Emergency Assistance) are perceived in terms of promoting horizontal principles like gender equality, green transition, and digital transition. Specific details related to Union Actions and Emergency Assistance were also included, in order to be analysed separately in thematic case studies. The findings detailed in the dedicated section below were combined with conclusions from other sources as part of the overall evaluation exercise.

Methodology

The target surveys included a mix of multiple-choice and open questions. Additionally, the surveys' design enabled participants to concentrate on the specific programming period they were involved in and, if engaged in both periods, to compare them, emphasising potential improvements.

As defined in the inception phase, the survey encompassed the entire EU and utilised contact information from MS representatives provided by the European Commission. Managing Authorities played a pivotal role in promoting survey participation among other stakeholders, including Audit Authorities, Delegated Authorities, Monitoring Committees, and beneficiaries.

The survey, available in English¹⁰³, was sent to 418 unique stakeholders: 143 contacts from National/Managing Authorities managing AMIF and 275 beneficiaries, UA, and EMAS.

¹⁰² National Authorities for the 2014-2020 programming period are the equivalent of the Managing Authorities in the 2021-2027 programming period. For most Member States, the National Authority and Managing Authority are the same. The targeted surveys addressed both the 2014-2020 and the 2021-2027 programming periods and it is possible survey respondents were only involved in one programming period, therefore reference is made to both National and Managing Authorities.

¹⁰³ Considering the request from beneficiaries, the survey for beneficiaries was also translated in French, Italian and German. Additionally, there were also particular cases where respondents provided answers in their language.

Management Authorities were requested to send the invitations to beneficiaries of National/Member State Programmes.

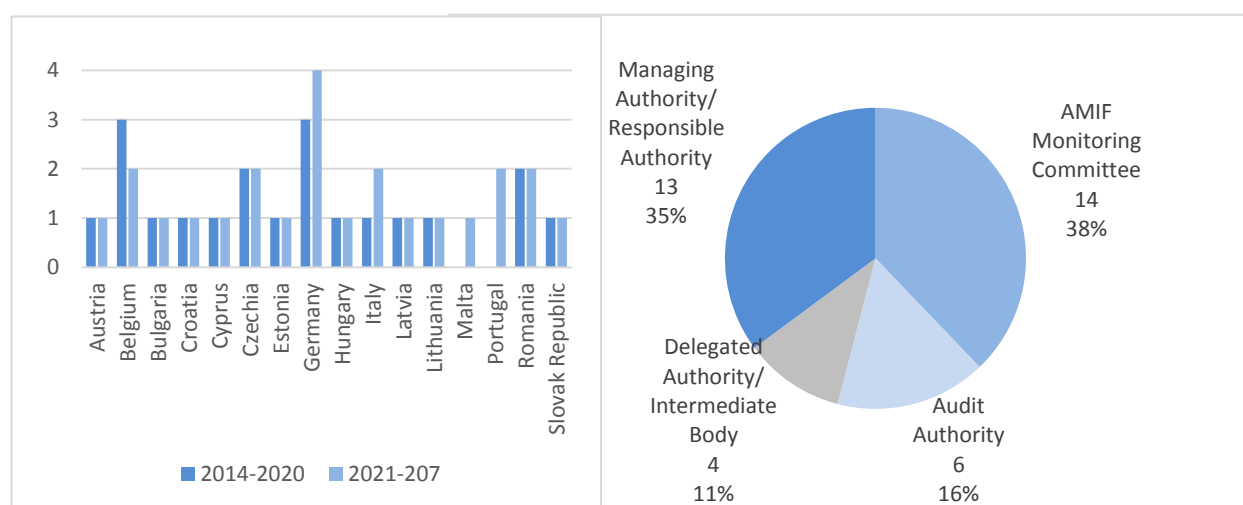
From an operational perspective, after DG HOME validated the survey questionnaires, they were distributed using the EU survey platform. Based on the contact list provided by the European Commission, the initial invitations were sent between 19 and 27 August, followed by two reminders in the first week of September, and a final reminder informing about the extension by 20 September 2024.

Respondents profile

Out of a total of 474 respondents who accessed the surveys¹⁰⁴ (48 National/Managing Authorities and 426 Beneficiaries), 419 completed questionnaires were considered for the analysis of the results (37 questionnaires from National/Managing Authorities and 382 from AMIF beneficiaries¹⁰⁵).

As indicated in the Figure 7 below, the survey's reach was broad, encompassing a **diverse typology of stakeholders**, with the strongest response rates from civil society and public authorities, central and local. The varying response rates across categories may indicate differences in the size of these groups, their accessibility and eligibility, or their interest in the survey's subject matter.

Figure 7: National/Managing Authorities and Beneficiaries: Distribution by typology



Source: Targeted Survey with beneficiaries and National Authorities (August - September 2024)

The survey successfully achieved a **broad coverage across all AMIF components** for both programming periods, as illustrated in Figure 8 below. The most significant level of participation was observed in the National Programme for the 2014-2020 period. This predominance may be attributed to the incipient stage of the programmes for the current

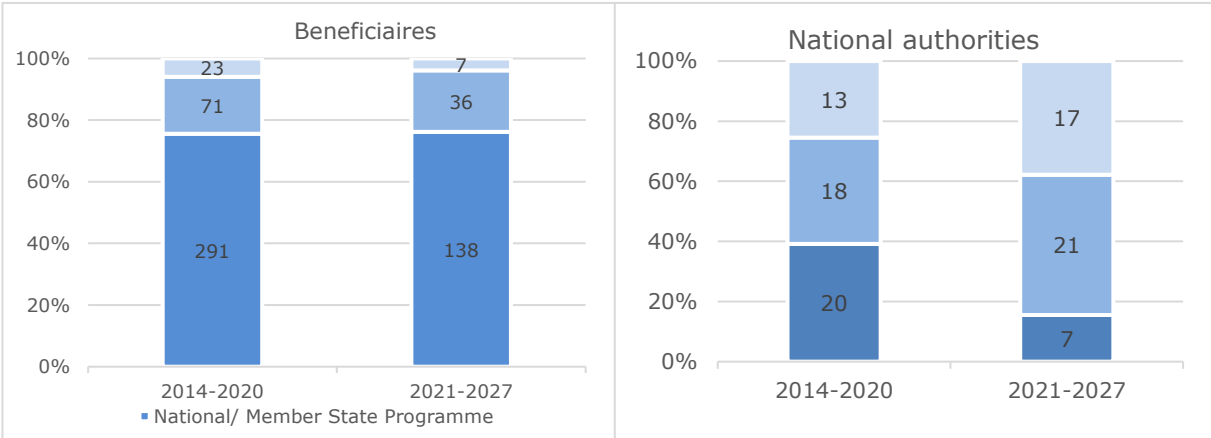
¹⁰⁴ The survey was sent to 418 unique stakeholders: 143 contacts from national authorities managing AMIF and 275 beneficiaries, Union Actions, and EMAS. Management Authorities were requested to send the invitations to beneficiaries of National/Member State Programmes.

¹⁰⁵ 11 National Authorities did not complete the questionnaire, with 27 beneficiaries were not sure about their involvement in AMIF funded projects (i.e. indicating "I don't know" in the filtering questions) and 17 stating they were not AMIF beneficiaries. So, uncomplete or not relevant questionnaires were not considered in the analysis of the results.

period and the larger financial allocations designated for National/Member State programmes compared to other AMIF components.

The survey questions were generally posed in a broad context, and whenever feasible, respondents were asked about their perceptions across different fund components and programming periods. However, considering that respondents were often involved in multiple fund components and programming periods, their responses may reflect their overall experiences rather than specific aspects of any single component or period. Therefore, conclusions drawn across fund components and programming periods should be approached with caution, and it is advisable to consider overarching trends rather than focusing solely on individual numbers or percentages.

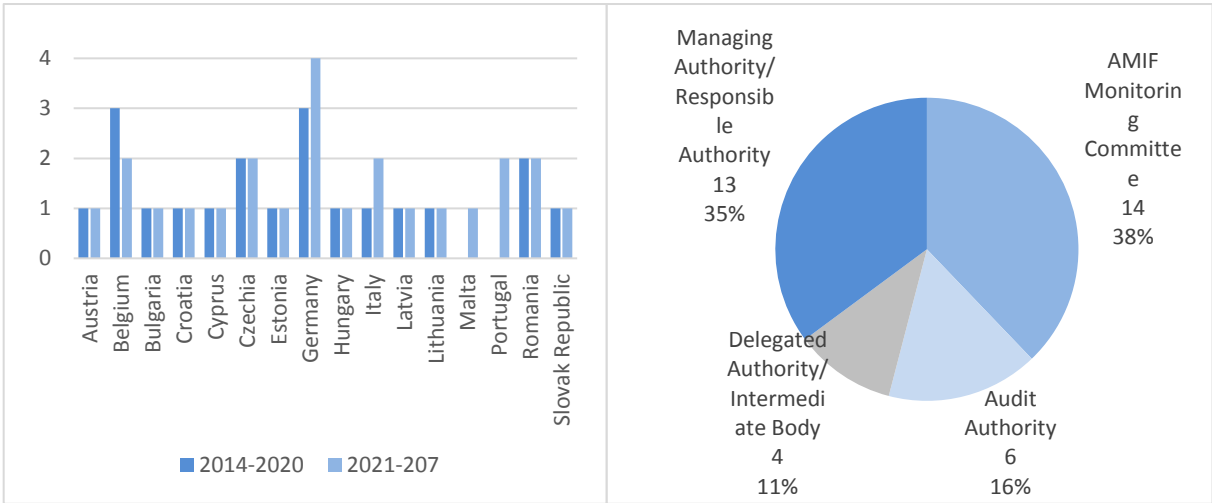
Figure 8: National/Managing Authorities and Beneficiaries: Distribution by fund components and programming period



Source: Targeted Survey, Beneficiaries and National Authorities (August - September 2024)

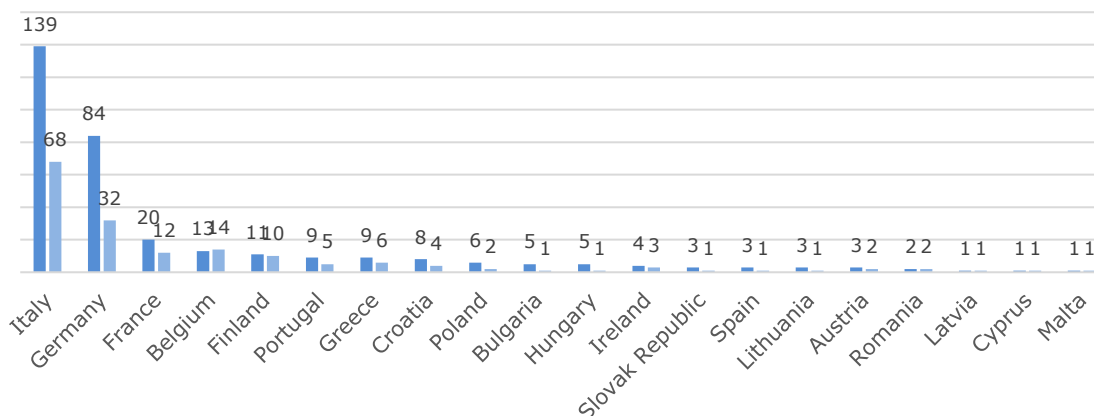
The survey's **distribution by Member State** shows **varying levels of coverage**, with some countries demonstrating a strong response rate while others have lower representation (see 9 below).

Figure 9: National/Managing Authorities: Distribution by Country and Role



Source: Targeted Survey, Beneficiaries and National Authorities (August - September 2024)

Figure 101: National/ Managing Authorities: Distribution by Country



Source: Targeted Survey, National Authorities (August - September 2024)

Results

This section presents the main findings per evaluation criterion, where relevant distinguishing between findings emerging from the consultation of NAs and findings emerging from the consultation of beneficiaries.

RELEVANCE

Upon analysing the survey findings, it is evident that there are some differences in perceptions between NAs/MAs and beneficiaries regarding the implementation and relevance of the AMIF.

NAs/MAs noted that the AMIF strategy planning used a diverse and inclusive approach at the national level. They positively assessed the fund's flexibility and relevance for 2014-2020 and 2021-2027. Many NAs/MAs reported that AMIF programme strategies were adapted based on political changes and stakeholder input, with the Monitoring Committee playing a positive role through its recommendations. Despite this, authorities sometimes had difficulties implementing these suggestions. Many NAs/MAs saw an improvement over the time in the proportionality and adequacy of the resource allocated to address migration needs. The majority felt the budget limits posed by the regulation were "slightly too low" or "adequate," hinting at support for more ambitious targets. For international protection transfer thresholds, only 40% found it adequate, with 25% of respondents seeing it as "slightly too high".

The survey indicates that there is general consensus among beneficiaries about the appropriateness of the support their organisations provided to TCNs, with this support meeting the needs of TCNs. Nonetheless, the agreement rate decreased from 88% to 63%, highlighting remaining challenges and obstacles in aiding TCNs.

Moreover, beneficiaries expressed concerns about the flexibility of calls for proposals and procurement procedures. While during the 2014-2020 period both calls for proposals and procurement procedures flexibility was rated positively by the majority of respondent, the positive perception diminished somewhat in the subsequent period.

Survey findings indicate that, despite most beneficiaries giving high marks to the staff's expertise and the clarity of information available for TCNs when seeking support, several challenges persist. Only 45% reported no language barriers, and less than half were satisfied with the length of the processes TCNs must navigate to access support. Although there has been slight progress in the 2021-2027 period in reducing language barriers and raising awareness of TCN rights and procedures, opinions remain divided. This suggests that further efforts are necessary to enhance the accessibility of support for TCNs.

COHERENCE

Consulted NAs/MAs consider that all components of the AMIF were complementary, coordinated, and effective, enhancing their impact during both the 2014-2020 and 2021-2027 periods. This view is even stronger for the 2021-2027 period. MAs particularly appreciated the synergies generated between AMIF and ESF for 2014-2020 and with ESF+ for 2021-2027.

EFFECTIVENESS

NAs/MAs and beneficiaries **generally agreed that AMIF has achieved its goals**, successfully supporting reception conditions, aiding vulnerable non-EU nationals, and helping with the integration and return of TCNs. NAs/MAs also acknowledge AMIF's contribution to the development of national strategies and fostering transnational cooperation.

Additionally, AMIF has been effective in **enhancing the capabilities of beneficiaries** supporting TCNs. Organisation representatives benefiting from capacity-building programmes reported a range of positive outcomes. These included increased collaboration and networking with other professionals, agencies, and authorities, as well as strengthened organisational procedures and more efficient case-handling. Furthermore, the development of new programs or services for TCNs and improved soft and technical skills to better support and manage procedures related to TCNs were highlighted. Specifically, 63% of the beneficiaries stated they have extensively applied the knowledge gained. Moreover, 45% noticed some changes, while 38% observed **major improvements in how their organization supports TCNs due to the support received under AMIF**.

Nevertheless, **there is room for improvement**; MAs focus on pre-departure measures, family reunification, and TCN relocation, while beneficiaries emphasise reintegration and enhancements in the asylum process.

The impact visibility of AMIF can be limited due to the current **electronic exchange system**, which MAs perceive as not fully capturing on-ground achievements, with no significant improvements observed for the 2021-2027 period.

Both categories of consulted stakeholders agree that **other groups** (not targeted by AMIF) **have benefited from its implementation**. Specifically, civil society organizations, service providers, and government agencies. Their views diverge on additional groups: NAs believe irregular migrants and temporary protection beneficiaries have gained, whereas beneficiaries disagree.

EFFICIENCY

The survey revealed that various strategies are used by NAs/MAs to **select the most effective projects**. From 2014 to 2020, they relied on qualitative and quantitative justifications from beneficiaries. In the 2021-2027 period, they are comparing market prices and learning from previous experiences, along with beneficiary justifications. The efficacy of these methods is further corroborated by feedback from beneficiaries: 60% of participants in AMIF 2014-2020 projects assisting TCNs reported delivering **efficient support at reasonable costs** relative to the positive outcomes achieved. A similar percentage regarded ongoing projects as cost-efficient, suggesting that the **expenses incurred so far provide significant value for money**.

Assessing the efficiency of **programme management** is challenging, as limited feedback and significant variability in estimates make it difficult to provide a single average figure for the time NAs/MAs spend on procurement procedures, monitoring, and reporting. However, the major finding is that collected estimates do not change between the two programming periods, indicating **no improvement in the effort required to manage tasks is perceived**.

The fund's efficiency is perceived to be partially reduced by the **administrative burdens** associated with regulatory obligations, which stakeholders (NAs/MAs) indicated to only partly justify the benefits. These obligations are viewed as more burdensome compared to national programs, while EU programs have similar administrative demands. However, **simplification measures have largely improved program efficiency**, with most respondents finding them helpful except for project-level reporting. Additionally, some Member States reported not adopting the "financing not linked to cost" measures. It is important to note that this analysis is based on stakeholders' perceptions, and they were not able to quantify the burdens¹⁰⁶.

Furthermore, the majority of consulted NAs/MAs (16) reported **irregularities** during audit missions, including non-compliance with procurement procedures, ineligible expenses, and delayed reporting. Seven cited all three issues combined.

FACTORS THAT INFLUENCED AMIF IMPLEMENTATION

Both NAs/MAs and beneficiaries agreed on the positive effects of AMIF resource allocation and the capabilities of both groups.

Additionally, NAs/MAs highlighted the positive impacts of implementing the Common European Asylum System and the Union Acquis.

However, opinions diverged on other factors: while NAs/MAs viewed the implementation of the Common European Asylum System and Union Acquis as beneficial, they considered external crises and migrant influxes, including COVID-19 and the war in Ukraine, to negatively impact AMIF.

¹⁰⁶ The respondents were asked "to provide an estimate of the average time spent, in both programming periods, (number of man-days that a full-time employee spent) for the preparation of : a. Direct awards (i.e., info to applicants, preparing calls and guidelines, contractualization); b. Competitive awards (i.e., info to applicants, preparing calls and guidelines, contractualization); c. Evaluation of proposals/ projects (screening and selecting applications); d. Monitoring of programme implementation (meetings of monitoring committees and sub committees); e. Reporting; f. Auditing and on-the-spot controls of projects". 18 respondents answered at this question, but considering the high variance of the data collected and the different level of details it was not possible to aggregate the answers

Conversely, most beneficiaries viewed the procedures required to start and manage an AMIF project as negative.

All other factors were seen as having neither a distinctly positive nor negative effect by all stakeholders consulted.

Notably, both NAs/MAs and beneficiaries concurred that the influencing factors for the 2014-2020 and 2021-2027 periods were essentially identical.

HORIZONTAL PRIORITIES

MAs consider that eligible measures under the AMIF, especially through Member State programmes and EMAS, are more relevant to promote gender equality. However, when it comes to digital and green transitions, there is a belief that AMIF-funded initiatives either support these priorities less effectively or that it is difficult to assess their relevance.

This conclusion is corroborated by beneficiaries' perceptions: they believe their projects have greater success in promoting gender equality compared to green or digital transitions.