



Council of the European Union
General Secretariat

Brussels, 11 March 2020

Interinstitutional files:

2018/0250(COD)

2018/0248(COD)

2018/0249(COD)

WK 2802/2020 INIT

LIMITE

**JAI
FRONT
VISA
ENFOPOL
SIRIS**

**CT
ASIM
MIGR
CODEC
COMIX**

WORKING PAPER

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

WORKING DOCUMENT

From:	General Secretariat of the Council
To:	JHA Counsellors on Financial Instruments

Subject:	Proposal for a Regulation of the European Parliament and of the Council establishing the Asylum and Migration Fund (AMF) 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 (BMVI) Proposal for a Regulation of the European Parliament and of the Council establishing the Internal Security Fund (ISF) - Comments from delegations on horizontal provisions
----------	---

Following the JHA Counsellors on Financial Instruments meeting on 28 February 2020, delegations will find enclosed a compilation of replies on horizontal provisions on the above mentioned proposals.

WK 2802/2020 INIT

LIMITE

EN

**Written comments submitted by the Member States
on horizontal provisions
following the JHA Counsellors on the Financial Instruments meeting
on 28.02.202**

**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, 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 the Internal Security Fund**

CONTENTS

AUSTRIA	2
BULGARIA	14
ESTONIA	31
FINLAND	36
FRANCE	39
HUNGARY	44
PORTUGAL	46
SLOVAKIA	48
SPAIN	51

AUSTRIA

PROVISION	AMF (WK 2137/2020 INIT)	AT Position	BMVI (WK 1803/20 INIT)	AT Position	ISF (WK 1799/20)	AT Position	Remarks:
General Principles	Line 121 (lines 120, 122 agreed)	AT supports the Council position, but is willing to compromise with the EP proposal.	(lines 144-146 agreed)	Lines 144 -146: AT can agree with the suggested changes by the Council.	line 153 (lines 152, 154 provisionally agreed)	Line 153: in principle ok Lines 152 and 154 (provisionally agreed): ok for AT	Text should be the same for all three funds.
Scope of Support (also P)	Lines 98 and 99	Line 98: AT supports the Council position. Line 99: AT supports the Council position.	Lines 118 and 119	Line 118: AT prefers the Council position but can agree with the suggested EP compromise text. Line 119: AT prefers the Council position.	Lines 128 and 129	Line 128: AT could agree to CION compromise drafting Line 129: AT supports Council position from 7.Juni 2019 + same approach in all 3 files	Could be individual for all three funds.
Eligible entities	Lines 112, 113, 115, 116 (Lines 204f, g, i, j)	AT supports the Council position regarding the location and	Lines 136, 139, 140 (Lines 243, 246, 247)	AT supports the Council position regarding the location and	Lines 144, 145, 147, 148 (Lines 244,245, 247, 248)	Lines 144 ff/ Lines 244ff: No AT-position because obviously Art. 5/15a refers only to	Text should be the same for all three funds.

	EP's position: Art. 6. (Council's position: new Art. 18a).	content of the Article.	EP's position: Art. 5. (Council's position: new Art. 16a).	content of the Article.	EP's position: Art. 5. (Council's position: new Art. 15a).	(in-)direct management / is an issue for CSL	
Co-financing rates (teal assistance covered below)	Lines 155, 157, 161, 162	Line 155: AT supports the Council position, but is willing to compromise with the COM proposal text for recital 17. Line 157: AT supports the Council position. Line 161: AT supports the Council position. Line 162: AT supports the Council position.	(Lines 181-185, 187-190 agreed)	Line 181: AT could compromise with the EP text. Lines 182 - 185: AT agrees. Lines 187 - 190: AT supports the Council Position.	(provisionally agreed) Line 196	Line 196 + Lines 197 & 198 (provisionally agreed): this is a question for the CSL -> no AT- position	The Co-financing rates should not be horizontal, but individual per Fund.
Programmes	Lines 165, 169, 171, 171a, (172), 173, 173a (169 agreed)	Line 165: AT supports the Council position. The inclusion of “the Commission” in	Lines 192, 201, (203), 213, 214	Line 192: AT supports the Council Position.	Lines 200, 216, 217, 218, 219	Line 200: AT can support the compromise text (AM 75) in general EXCEPT the reference to article	General remark: A harmonization of the text in the three funds is essential, but as the positions in the

		the text is not a must, but can be tolerated. Line 169: AT supports the Council position. Line 171: AT supports the Council position. Line 171a: AT is fine with the EP amendment. (Line 172): AT supports the Council position Line 173 and Line 173a: AT supports the Council position.		Line 201: AT can agree on the changes in the compromise text and is willing to compromise with the EP amendments. Line 213: AT can support the Council Position changes. Line 214: AT does not agree on the EP amendments and supports the Council position.		3a – AT prefers to leave the provisions under Annex II Line 216 (Art. 12/6): • AT supports the Council position • AT will not support any reference to targets/milestones and - additional - the CPR regarding the “performance report” is not yet agreed but still under negotiation Line 217: AT supports Council position (“AT too does not want to limit MS room of manoeuvre”) Line 218: • EP AM with reference to Art. 5: if Art. 5 is a	three funds are so different, it seems not possible for AT to find a common understanding. It would easier to have a harmonized text to discuss with all three funds and not separate text proposals. 4th of March: Lines 165 (AMF), 192 (BMVI), 200 (ISF): wording can be individual; Lines 169 (AMF), 201 (BMVI), 216 (ISF): aligned wording would be appreciated; only ISF has the mentioning of the EP’s position that reference to targets/milestones
--	--	---	--	---	--	---	--

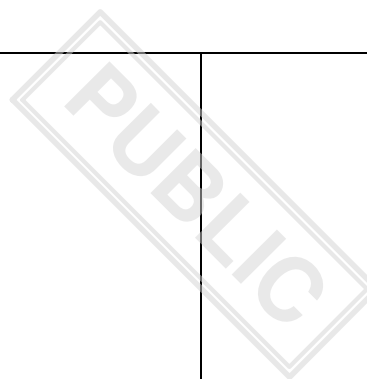
					provision only for indirect/direct management, then the reference to Art. 5 is not correct on our point of view • EP “consult” should stay: AT supports the Council position but is flexible regarding “consult” AT will not agree to EP AM 84 -> justification: this would lead to a very time-consuming procedure and makes necessary cooperation with third-countries in the area of combatting and preventing crime de facto not feasible (“crime does not stop on EU-borders”; we live in a	should be taken into account. Lines 171 (AMF), 213 (BMVI), 217 (ISF): all three funds support the council position, which has the same wording. Same wording is appreciated. Line 171a only exists in AMF!!! Line 214 only in BMVI!!! Lines 172 (AMF), 218 (ISF): these provision refer to measures in third countries within the shared management. Council position and an aligned wording is supported.
--	--	--	--	--	---	--

						globalized world and criminals work world-wide) • AT strongly emphasizes the importance and necessity of a strong third country component in the ISF to prevent and combat all forms of crime in a globalized world. Therefore AT takes a negative position towards provisions restricting actions in relation with/in third countries! Line 219: AT strongly supports the Council position from 7.Juni 2019	Line 173a only exists in AMF!!! → no support for this EP amendment. 173 (AMF), 214 (BMVI), 219 (ISF): the Council position and the same wording is supported in all three funds.
Specific actions	Line 179	AT supports the Council position.	Line 222	AT supports the Council position changes.	Line 226 (provisionally agreed)	• If it should be identical across the Funds -> AT	Text should be the same for all three funds.

						does not agree EP-AM in AMF (AM 117) and BMVI (AM 104)	
Technical Assistance	(lines 159a, 221 agreed)	AT supports the Council position.	Lines 186, 260	Line 186: AT agrees. Line 260: AT agrees with the Council position. Cross reference to the CPR is fine for AT.	lines 194, 262	Line 194 (Art. 11/5a): “proposed wording” ok for AT Line 262 (Art. 19): AT can support fund-specific deviations as well as can agree Council + CION position: this should be horizontally aligned → so for ISF, AT takes a flexible position	4th of March: The wording the articles of all three funds has the same meaning. Nevertheless, the wording should be aligned. Looking at the positions of all three funds, the content of the text can be accepted. It says that within the limits in the CPR, TA of the MS may be financed up to 100% of the Union budget.
Monitoring and reporting	Lines 256, 258, 260 (Art. 28) Lines 279, 280 (Art. 31)	Line 256: AT supports the Council position and appreciates that the EP is not considering	Lines 287, 289, 291-293 (Art. 25) Lines 321-322 (Art. 28)	Line 287: AT supports the Councils position and appreciates that the EP is not considering to	Lines 286, 288, 290 (Art. 24) Lines 317, 318 (Art. 27)	Line 286: according to the comment in the 4-CT CION is to verify if (I) is correct → therefore AT waits for CION	4th of March: At the moment, the wording in all three regulations are the same and it should also stay the same. The

		to including “at least annually”. Line 258: AT supports the Council position. Line 260: AT supports the Council position. Lines 279 and 280: AT supports the Council position.		including “at least annually”. Line 289: AT supports the Council position. Lines 291 – 293: AT supports the Council position. Line 321 - 322: AT supports the Council position.		to come back with the information • Line 288: • AT supports identical provisions according the fund-specific Council position; • additional AT will not support any amendments which lead – if one summarizes all proposed amendments –to inadequate high reporting obligations and administrative burden (on side of CION as well as Member States) Line 290: AT supports Council position from 7.June 2019 Line 316: EP-observation that	negotiation development in the CPR has to be kept in mind and the wording changed accordingly. All in all, AT supports the Council position in all three funds for all the lines in question.
--	--	--	--	---	--	---	---

						title appears twice in Art. 24 + Art. 27 → AT question: ?will it make sense to merge the 2 articles.	
Evaluation	Lines 262 - 2631 (Art. 29/29a)	AT supports the Council position. The actual start of the financial period could be delayed, so the proposed text by the EP that includes actual dates is not realistic and should not be in the proposal.	Lines 295-304 (Art. 26)	Lines 295 - 304: AT supports the Council position. The actual start of the financial period could be delayed, so the proposed text by the EP that includes actual dates is not realistic and should not be in the proposal.	Lines 292-300 (Art. 25)	Lines 292 – 300: • AT supports Council position and will not agree with the proposed EP-amendments! • The presentation of the report by COM on 31.12.2024 means, that the MS will have to carry out an evaluation in 2023 – so Member States have to start the tender procedure at the latest in 2022 Having in mind that in most of the Member States the full	See comments for monitoring and reporting.



						implementation of the Fund will not start on 1st of January 2021 but (for sure) later, the proposed date is too early to present meaningful results! • Furthermore lot of the proposed amendments put an enormous additional burden on the MS during a time, when MS have to concentrate on efforts to start the programmes successfully and make sure that actions will be implemented in a good way by beneficiaries. • Additional - Member States as well as	
--	--	--	--	--	--	--	--

						beneficiaries in the area of Home-Funds have to be accustomed to a fully new system which CPR will bring to the implementation-mode – so any additional inadequate reporting / information etc.-burden should be avoided.	
(poss.) Annual performance reports (CPR links; also P)	Lines 266-271, 272, 274-275, 276-277 (Art. 30)	AT supports an approach with less administrative burden for the MS. The Lines for the Annual performance report have to be in line with the CPR. There, a review meeting is proposed and the Home Funds have the choice to decide	Lines 307-312, 315, 317-319 (Art. 27)	AT supports an approach with less administrative burden for the MS. The Lines for the Annual performance report have to be in line with the CPR. There, a review meeting is proposed and the Home Funds have the choice to decide	Lines 303-308, 311, 313-315 (305 agreed) (Art. 26)	Regarding Art. 26 there are ongoing discussions in the CPR group – so negotiations are linked to the CPR-outcome ; in general □ AT supports the Council position In a nutshell AT takes a negative position to all EP-AM, as they lead to an unnecessary additional reporting	4th of March: Text should be the same in all three funds. These provisions are linked to the CPR negotiations. See comment for AMIF and BMVI → wording is not linked to the CPR yet. Any additional administrative burden is not

		together with the COM, if such an annual review meeting is needed. If not, then the MS can only send a written report. If this option is possible, AT does support it, but also the current Council position in the AMIF proposal is fine for AT.		together with the COM, if such an annual review meeting is needed. If not, then the MS can only send a written report. If this option is possible, AT does support it, but also the current Council position in the BMVI proposal is fine for AT.		and administrative burden for all relevant actors implementing the Fund (for CION and MS-authorities as well as beneficiaries!).	supported in all three funds.
Annexes V and VIII (indicators)	General discussion on possible horizontal approach.	AT is of the opinion that marching the ANNEXES is only beneficial, if the indicators are clearly divided into those that are in the responsibility of the COM and those that are in the responsibility of the MS. That the	General discussion on possible horizontal approach.	AT is of the opinion that marching the ANNEXES is only beneficial, if the indicators are clearly divided into those that are in the responsibility of the COM and those that are in the responsibility of the MS. That the	ISF (WK 1799/20)	Annex V: Lines 392 – 420; Annex VIII: Lines 497 – 592 Regarding the <u>structure of the indicators</u> AT supports an identical approach over the Funds. <u>Data-source</u> should be clearly stated incl. fund-specific deviations if	Should be the same in all three funds.

		indicators have to be gathered separately by the COM and by the MS was the reason in the first place, why there are two ANNEXES regarding indicators. If the above mentioned clear definition of responsibilities is not given, then AT supports the Council position meaning the PGA.		indicators have to be gathered separately by the COM and by the MS was the reason in the first place, why there are two ANNEXES regarding indicators. If the above mentioned clear definition of responsibilities is not given, then AT supports the Council position meaning the PGA.		necessary/if this makes sense • The overall goal should be that collected datas are comparable so that valid results of European Funds will be available	
--	--	---	--	---	--	---	--

BULGARIA

Issue	AMF (WK 2137/20)	BMVI (WK 1803/20)	ISF (WK 1799/20)	
General principles	line 121 (lines 120 – Union added value, 122 – ref. to CPR agreed) The Commission and the Member States shall ensure that the support provided under this Regulation and by the Member States is consistent with the relevant activities, policies and priorities of the Union and is complementary to and coordinated with national instruments and measures funded under other Union funds, in particular the structural funds and external financing instruments of the Union. [Am. 87] AMF comment: Co-legislators agreed to continue discussions on the issue on the coordination with other funds in the horizontal format. Commission clarified that Article 8(b)(iii) of CPR still	(lines 144-146 agreed) 144 – Union added value 146 – ref. CPR 145 The Commission and the Member States shall ensure that the support provided under this Regulation and by the Member States is consistent with the relevant activities, policies and priorities of the Union and is complementary to other Union instruments. PGA	line 153 (lines 152, 154 provisionally agreed) EP 2. The Commission and the Member States shall ensure that the support provided under this Regulation and by the Member States is consistent with the relevant activities, policies and priorities of the Union and is complementary to other Union national instruments and coordinated with other instruments of the Union, in particular actions carried out under other Union funds. [AM63]	Support to the PGA.

	applies to the Fund. The EP nevertheless reiterates that CPR applies only to shared management.			
Scope of support (also P)	Lines 98 and 99 EP – 98. Within the objectives referred to in Article 3, and in line <i>In accordance</i> with the implementation measures listed in Annex II, the Fund shall in particular support the actions <i>that contribute to the achievement of the objectives referred to in Article 3 and are</i> listed in Annex III. <i>The Commission shall be empowered to adopt delegated acts in accordance with Article 32 to amend the list of actions eligible for support from the Fund in Annex III.</i> [Am. 74]	Lines 118 and 119 EP - 118 Within the objectives referred to in Article 3 and In line with the implementation measures listed in Annex II, the instrument shall <i>support actions that contribute to the achievement of the objectives referred to in Article 3 and</i> in particular support the actions listed in Annex III. [Am. 59] PGA Within the objectives referred to in Article 3 and in-line with the implementation measures listed in Annex II, the Fund shall <i>support actions such as those in particular support the actions listed in Annex III.</i>	Lines 128 and 129 T, H – the same approach to be maintained in all three files. EP, Council: Annex III to be considered as a non-closed list. CION compromise drafting: 1. Within the objectives referred to in Article 3 and in-line with the implementation measures listed in Annex II, the Fund shall <i>in particular</i> support measures <i>such as those the actions</i> listed in Annex III. CNS: could agree to COM drafting 128 EP To achieve the objectives <i>referred to in Article 3</i> of this Regulation, the Fund	Support to the PGA

			may <i>in exceptional cases, within defined limits and subject to appropriate safeguards</i>, support actions in-line with the Union priorities as referred to in Annex III in relation to and in third countries, where appropriate, in accordance with Article 5. [AM52] PGA Within the objectives referred to in Article 3 and in-line with the implementation measures listed in Annex II, the Fund shall <i>support actions such as those</i> in particular support the actions listed in Annex III.	
	99. To achieve the objectives <i>referred to in Article 3</i> of this Regulation, the Fund may, <i>in exceptional cases, within defined limits and subject to appropriate safeguards</i>, support the actions in line with the Union priorities as referred to in Annex III in relation to and in third countries, where	119 2. To achieve the objectives of this Regulation <i>referred to in Article 3</i>, the instrument may <i>in exceptional cases, within defined limits, and subject to appropriate safeguards</i>, support actions in line with Union priorities as referred to in Annex III in relation to and in third	129 Same as ISF	

	appropriate, in accordance with Article 5 and 6. [Am. 75]	countries, where appropriate, in accordance with Article 5. [Am. 60] PGA To achieve the objectives of this Regulation, the instrument may support actions in line with Union priorities as referred to in Annex III in relation to and in third countries, where appropriate, in accordance with Article 16a 5.		
Eligible entities	Lines 112, 113, 115, 116 (Lines 204f, g, i, j) EP's position: Art. 6. (Council's position: new Art. 18a).	Lines 136, 139, 140 (Lines 243, 246, 247) EP's position: Art. 5. (Council's position: new Art. 16a).	Lines 144, 145, 147, 148 (Lines 244,245, 247, 248) EP's position: Art. 5. (Council's position: new Art. 15a).	
Co-financing rates (total assistance covered below)	Lines 155, 157, 161, 162 155 EP The contribution from the Union budget shall not exceed 75 % of the total eligible expenditure of a project. <i>Member States are encouraged to provide matching funds for activities supported by the Fund.</i> Poss compromise	(Lines 181-185, 187-190 agreed) 181 EP The contribution from the Union budget shall not exceed 75% 85 % of the total eligible expenditure of a project <i>from Member States whose per capita gross national income ('GNI') is</i>	(provisionally agreed) Line 196 189 – The contribution from the Union budget shall not exceed 75 % of the total eligible expenditure of a project.	Co-financing rate to be defined for types of action as agreed in BMVI (182-185).

	"(17) ... at Union level, <i>Member States are encouraged to provide funding from the budget of national public authorities where it is essential for a project to be carried out, particularly when the project is implemented by a civil society organisation. The Fund should ...</i>"	<i>less than 90 % of that of the Union average and 75 % of the total eligible expenditure for other Member States. [Am. 83]</i>		
	157 EP The contribution from the Union budget <i>shall be increased to a minimum of 80 % and</i> may be increased to 90 % of the total eligible expenditure for actions listed in Annex IV. [Am. 102] The Commission to send explanation in writing to both co-legislators.	Compromise EP-EC-CIL 182 The contribution from the Union budget may be increased to 90 % of the total eligible expenditure for projects implemented under specific actions. 183 The contribution from the Union budget may be increased to 90 % of the total eligible expenditure for the actions listed in Annex IV. 184 The contribution from the Union budget may be increased to 100 % of the total eligible expenditure for operating support, including the Special Transit Scheme.		

		185 The contribution from the Union budget may be increased to 100 % of the total eligible expenditure for emergency assistance.		
	161 Provisional agreement "7. For each <i>type of action</i> specific objective, the Commission decision <i>approving a programme</i> shall set out whether the co-financing rate for the <i>type of action</i> specific objective is to be applied to <i>either of the following</i>:" PGA For each <i>type of action</i> specific objective, the Commission decision <i>approving a programme</i> shall set out whether the co-financing rate for the <i>type of action</i> specific objective is to be applied to <i>either of the following</i>: 162 PGA a) the total contribution, including the public and private contributions; or	187-190 agreed The Commission decision approving a programme shall set the co-financing rate and the maximum amount of support from this instrument for the types of action referred to in paragraphs 1 to 5. EP agrees with Council text (subject to horizontal agreement on terminology it is confirmed that "action" is correct) 7. For each <i>type of action</i> specific objective, the Commission decision <i>approving a programme</i> shall set out whether the co-financing rate for the <i>type of action</i> specific objective is to be applied to <i>either of the following</i>:	PGA For each <i>type of action</i> specific objective, the Commission decision <i>approving a programme</i> shall set out whether the co-financing rate for the <i>type of action</i> specific objective is to be applied to <i>either of the following</i>:	We could support the PGA

Programmes	Lines 165, 169, 171, 171a, (172), 173, 173a (169 agreed) 165 EP Each Member State <i>and the Commission</i> shall ensure that the priorities addressed in its the <i>national</i> programme are consistent with, and respond to, the Union priorities and challenges in the area of <i>asylum and</i> migration management, and are fully in line with the relevant Union <i>acquis</i> and agreed <i>the international obligations of the Union priorities and Member States arising from international instruments to which they are signatories, in particular the UN Convention on the Rights of the Child</i>. In defining the priorities of their programmes Member States shall ensure that the implementation measures set out in Annex II are adequately addressed. PGA	Lines 192, 201, (203), 213, 214 192 EP compromise proposal: 1. Each Member State <i>and the Commission</i> shall ensure that the priorities addressed in its the <i>national</i> programme are consistent with and respond to the Union priorities and challenges in the area of border management and visa, and that they are fully in line with the relevant Union <i>acquis</i>, <i>including relevant international law and the Union acquis on fundamental rights</i> and agreed Union priorities, and the international obligations of the Union and Member States arising from international instruments to which they are signatories. In defining the priorities of their programmes, Member States shall ensure that the implementing measures as	Lines 200, 216, 217, 218, 219 200 COM: T + H, would like to align with AMF and BMVI, will propose wording, “ensure” too strong EP: no intention to introduce new procedure but to reflect CPR; proposal to reverse the order of sentences to make the sequence of the stages clearer: 1. In defining the priorities of their [<i>national</i>] programmes, Member States shall ensure that the implementation measures as set out in Annex II <i>Article 3 a</i> are adequately addressed. Each Member State, <i>and the Commission at the stage of approval</i>, shall ensure that the priorities addressed in its the <i>national</i> programmes are consistent with and respond to Union priorities and challenges in the area of security and are fully in line	We support the reference to EC concerning consistency of NP priorities with these of the EU. We would like to keep the text “while taking into account the specific context of each Member State” of the PGA in line 165 of AMF. For the rest of the text we support the EP compromise proposal on line 200 of ISF.
--------------------------	--	--	---	--

	Each Member State shall ensure that the priorities addressed in its programme are consistent with, and respond to, the Union priorities and challenges in the area of migration management and are fully in line with the relevant Union <i>acquis</i> and agreed Union priorities, <i>while taking into account the specific context of each Member State</i>. In defining the priorities of their programmes Member States shall ensure that the implementation measures set out in Annex II are adequately addressed. Comment Reference to 'the Commission' in the first sentence is horizontal. The EP notes on-going discussions in BMVI in which Commission has shown a willingness to be referenced here but not at the same level as the Member States. The EP will propose a possible compromise at the horizontal level.	set out in Annex II are adequately addressed. EP to send a revised compromise text which takes into account COM concern ("ensure")	with the relevant Union <i>acquis</i> and agreed Union priorities. [AM75]	
--	---	---	--	--

	The Commission suggested 'migration management, including asylum' as a possible reference for better clarity. The EP suggest referring simply to 'asylum and migration'.			
	169 Provisional agreement reached at the technical level on 17 February 2020: "5. Where necessary, the programme in question shall be amended to take into account the recommendations referred to in paragraph 4. Depending on the impact of the adjustment, the revised programme may be approved by the Commission"	201 Presidency compromise suggestion: 8. Where necessary, the programme in question shall be amended to take into account the recommendations referred to in paragraph 5. Depending on the impact of the adjustment, the revised programme may be approved by the Commission. The revised programme shall be approved by the Commission in the cases referred to in Article 19 of Regulation XXX [CPR] Awaiting feedback from ISF	216 EP: Achievement of milestones and targets should be taken into account. CION: Targets are not revised. Agreed: the question of "may" or "shall" shall be left to the legal experts EP Where necessary, the programme shall be amended to take into account the recommendations referred to in paragraph 5 and the progress in achieving the milestones and targets as assessed in the annual performance reports as referred to in Article 26(2)(a). Depending on the impact of the adjustment, the revised programme may shall be approved by the	Concerning ammdement of programmes following recommendations we support the provisional agreed text in line 169 of AMF. Concerning the text "Member States may/shall in particular pursue the actions eligible for higher co-financing as listed in Annex IV, we prefer the word may.

			Commission <i>in line with the procedure set out in Article 19 of Regulation (EU) No X [CPR]</i> . [AM83]	
	171 PGA Member States may shall in particular pursue the actions eligible for higher co-financing as listed in Annex IV. In the event of unforeseen or new circumstances or in order to ensure the effective implementation of funding, the Commission shall be empowered to adopt delegated acts in accordance with Article 32 to amend the list of actions eligible for higher co-financing as listed in Annex IV. 171a EP new <i>7a. National programmes may allow for the inclusion in the actions referred to in point 3a of Annex III of immediate relatives of persons covered by the target group referred to in that point, to the extent that it is necessary for the effective</i>	213 PGA Member States may shall pursue in particular the actions listed in Annex IV. To address unforeseen or new circumstances or to ensure the effective implementation of funding, the Commission shall be empowered to adopt delegated acts in accordance with Article 29 to amend Annex IV. COM and EP do not agree. Council sticks to its position. To be discussed at political level.	217 PGA Member States may shall pursue in particular the actions listed in Annex IV. In the event of unforeseen or new circumstances or to ensure the effective implementation of funding, the Commission shall be empowered to adopt delegated acts in accordance with Article 28 to amend Annex IV. Council: don't want to unnecessarily limit MS' room of manoeuvre EP: stick to CION proposal, linked to higher co-financing;	

	<i>implementation of such actions.</i> [Am. 109]			
	172 <i>Without prejudice to the second subparagraph of Article 4(2), whenever a Member State decides to implement projects with or in a third country with the support of the Fund, the Member State concerned shall consult request the approval of the Commission prior to the start of the project. The Commission shall ensure the complementarity and coherence of the planned projects with other Union and Member State actions taken in or in relation to the third country concerned and shall verify that the conditions set out in point (3) of point (a) of Article 6(1) are met.</i> [Am. 110]	203 EP Whenever <i>Before</i> a Member State decides to implement projects with, <i>in</i> or in <i>relation to</i> a third country with the support of the instrument, <i>it shall ensure that all actions proposed by, in or in relation to that third country comply with the international obligations of the Union and that Member State, and that they fully respect the rights and principles enshrined in the Charter of Fundamental Rights of the European Union.</i> The Member State concerned shall consult the Commission prior to the start of the project, <i>including on ensuring that the above conditions are fulfilled.</i> [Am. 92] PGA Whenever a Member State decides to implement <i>new</i> projects with or in a third	218 EP Whenever a Member State decides to implement projects with <i>in</i> or in <i>relation to</i> a third country <i>as referred to in Article 5</i>, with the support of the Fund, the Member State concerned shall consult the Commission prior to the start of the project. <i>The Commission shall assess the complementarity and coherence of the projects envisaged with the other actions of the Union and the Member States, in relation to the third country concerned. The Commission shall also check the conformity of the proposed projects with the fundamental rights requirements referred to in Article 3(4).</i> [AM84] PGA Whenever a Member State decides to implement <i>new</i> projects with or in a third	

		country with the support of the instrument, the Member State concerned shall approve the project after informing consult the Commission prior to the start of the project.	country, with the support of the Fund, the Member State concerned shall inform consult the Commission prior to the approval start of the project. EP: "consult" should stay; can be flexible regarding the timing of the consultation CION: flexible on "new" and "approval".	
	173 EP Programming as referred to in Article 17(5) of Regulation (EU) No .../2021 [Common Provisions Regulation], Each national programme shall be based on set out for each specific objective the types of intervention set out in accordance with Table 1 of Annex VI and provide an indicative breakdown of the programmed resources by type of intervention or area of support. [Am. 111] 173a – 9a Each Member State shall publish its programme on a dedicated website and forward it to the European Parliament	214 EP Programming as referred to in Article 17(5) of Regulation (EU) No .../... [CPR] Each programme shall be based on set out for each specific objective the types of intervention set out in accordance with Table 1 of Annex VI and an indicative breakdown of the programmed resources by type of intervention or area of support. [Am. 98] Check for overlap with CPR, EP to reflect and consult internally.	219 Council: EP amendment seems ok; CION should propose redraft. Will get back re Table 1 or 2. EP: insists on explicit mention of "indicative breakdown"; could be redrafted: "Programming as referred to in Article 17(5) of Regulation (EU) No [CPR] shall be based on the types of intervention set out in Table 21 of Annex VI and include an indicative breakdown of the programmed resources by type of action."	We do not support the EP ammendment in line 173a of AMF.

	<i>and to the Council. That website shall specify the actions supported in the implementation of the programme and list the beneficiaries. It shall be updated regularly, at least at the same time as the publication of the Annual Performance Report referred to in Article 30. [Am. 112]</i>			
Specific actions (Union added value)	Line 179	Line 222 Specific actions are transnational or national projects bringing Union added value in line with the objectives of this Regulation for which one, several or all Member States may receive an additional allocation to their programmes. [Am. 104	Line 226 (provisionally agreed)	
Technical assistance	(lines 159a, 221 agreed)	lines 186, 260 (technical assistance at the initiative of the EC.)	lines 194, 262	
Monitoring and reporting	Lines 256, 258, 260 (Art. 28) Lines 279, 280 (Art. 31) 256 - Reference to 1046,	Lines 287, 289, 291-293 (Art. 25) Lines 321-322 (Art. 28) 287 – Reference to 1046	Lines 286, 288, 290 (Art. 24) Lines 317, 318 (Art. 27) 286 – Reference to 1046	

	258 - EP <i>Upon request, the data received by the Commission on output and result indicators shall be made available to the European Parliament and to the Council.</i>	289 – EP The indicators to report on progress of the instrument towards the achievement of the objectives of this Regulation are set out in Annex VIII. For output indicators, baselines shall be set at zero. The milestones set for 2024 and targets set for 2029 shall be cumulative. <i>For resources under shared management, common indicators shall be used. Upon request, the data received by the Commission on the output and result indicators shall be made available to the European Parliament and to the Council. [Am. 121]</i>	288 – EP The indicators to report on progress of the Fund, towards the achievement of the specific objectives set out in Article 3, are set out in Annex VIII. For output indicators, baselines shall be set at zero. The milestones set for 2024 and targets set for 2029 shall be cumulative. <i>Upon request, the Commission shall make the data on the output and result indicators it has received available to the European Parliament and to the Council.</i>	We are flexible on EP amendments on common indicators, as well as on provision of data from EC to EP. (Lines 260 AMF, 291 BMVI 290 ISF.) We support the addition in the PGA texts that any amendment to the content of Annex VIII shall only start to apply in the first accounting year following the year of adoption of the delegated act.
	260 – PGA In order to ensure effective assessment of the progress of the Fund towards the achievement of its objectives, the Commission shall be empowered to adopt delegated acts in accordance with Article 32 to amend Annex VIII to review and complement the	291 – PGA In order to ensure effective assessment of the progress of the instrument towards the achievement of its objectives, the Commission shall be empowered to adopt delegated acts in accordance with Article 29 to amend Annex VIII to review and	290 – PGA In order to ensure effective assessment of the progress of the Fund towards the achievement of its objectives, the Commission shall be empowered to adopt delegated acts in accordance with Article 28 to amend Annex VIII to review and	

	indicators where necessary and to supplement this Regulation with provisions on the establishment of a monitoring and evaluation framework, including for project information to be provided by the Member States. <i>Any amendment to Annex VIII shall only start to apply in the first accounting year following the year of adoption of the delegated act.</i>	complement the indicators where necessary and to supplement this Regulation with provisions on the establishment of a monitoring and evaluation framework, including information to be provided by the Member States. <i>Any amendment to Annex VIII shall only start to apply in the first accounting year following the year of adoption of the delegated act.</i> The main issue raised by the EP is that the maximum delay could be as much as 18 months. 292 – EP new <i>5a. For resources under shared management, monitoring and reporting shall be based on the types of intervention set out in Annex VI. The Commission shall be empowered to adopt delegated acts in accordance with Article 29 to address unforeseen or new</i>	complement the indicators where necessary and to supplement this Regulation with provisions on the establishment of a monitoring and evaluation framework, including for project information to be provided by the Member States. <i>Any amendment to the content of Annex VIII shall only start to apply in the first accounting year following the year of adoption of the delegated act.</i> EP added – <i>Qualitative indicators shall be included for the assessment.</i>[AM105]	
--	---	--	--	--

		<i>circumstances or to ensure the effective implementation of the funding. [Am. 122]</i> 293 – EP new <i>5b. The Commission shall pay particular attention to the monitoring of actions by, in or in relation to third countries, in accordance with Article 5 and Article 12(10) and (11). [Am. 123]</i>		
	279 - PGA 1. Monitoring and reporting in accordance with Title IV of Regulation (EU) .../... [Common Provisions Regulation] shall be based on the types of intervention set out in Tables 1, 2, and 3 and 4 in Annex VI. To address unforeseen or new circumstances or to ensure the effective implementation of the funding, the Commission shall be empowered to adopt delegated acts to amend the types of intervention in accordance with Article 32.	321 - PGA Monitoring and reporting in accordance with Title IV of Regulation (EU) No .../... [CPR] shall be based on the types of intervention set out in Tables 1, 2, and 3 and 4 in Annex VI. To address unforeseen or new circumstances or to ensure the effective implementation of the funding, the Commission shall be empowered to adopt delegated acts to amend Annex VI in accordance with Article 29.	317 – PGA 1. Monitoring and reporting, in accordance with Title IV of Regulation (EU) No [CPR], shall be based on types of intervention set out in Tables 1, 2, and 3 and 4 of Annex VI. To address unforeseen or new circumstances or to ensure the effective implementation of funding, the Commission shall be empowered to adopt delegated acts to amend Annex VI in accordance with Article 28.	On 279 and 280 (AMF), 321 and 322 (BMVI), 317 and 318 (ISF) we support the text of the PGA which is unified across the proposals.

	2. These indicators <i>set in Annex VIII</i> shall be used in accordance with Articles 12(1), 17 and 37 of Regulation (EU) .../2021 [Common Provisions Regulation]. 280 <i>Article 31a Processing of personal data</i>	322 - PGA The common indicators <i>set in Annex VIII</i> shall be used in accordance with Articles 12(1), 17 and 37 of Regulation (EU) No .../... [CPR].	318 - PGA 2. The indicators <i>set in Annex VIII</i> shall be used in accordance with Articles 12(1), 17 and 37 of Regulation (EU) No [CPR].	
Evaluation	Lines 262 - 2631 (Art. 29/29a) PGA – reference to CPR EP – detailed description of the process and time limit, midterm and retrospective evaluation	Lines 295-304 (Art. 26) PGA – reference to CPR EP – detailed description of the process and time limit, midterm and retrospective evaluation	Lines 292-300 (Art. 25) PGA – reference to CPR EP – detailed description of the process and time limit, midterm and retrospective evaluation	We support the texts of the PGA.
(poss.) Annual performance reports (CPR links; also P)	Lines 266-271, 272, 274-275, 276-277 (Art. 30)	Lines 307-312, 315, 317-319 (Art. 27)	Lines 303-308, 311, 313-315 (305 agreed) (Art. 26)	We support the text in the PGA of the three proposals.
Annexes V and VIII (indicators) General discussion on possible horizontal approach.				We need to hear more from the Presidency on the suggestion of the EP on merging of the annexes.

ESTONIA

Issue	AMF (WK 2137/20)	BMVI (WK 1803/20)	ISF (WK 1799/20)	Comments
General principles	line 121 (lines 120, 122 agreed)	(lines 144-146 agreed)	line 153 (lines 152, 154 provisionally agreed)	All three Funds should have the same text. EE supports the text agreed in the BMVI.
Scope of support (also P)	Lines 98 and 99	Lines 118 and 119	Lines 128 and 129	Annex III must be non-closed list. EE could support the CION proposal in the ISF for all three funds, however we prefer the Council wording, because it's comprehensive in less words.
Eligible entities	Lines 112, 113, 115, 116 (Lines 204f, g, i, j) EP's position: Art. 6. (Council's position: new Art. 18a).	Lines 136, 139, 140 (Lines 243, 246, 247) EP's position: Art. 5. (Council's position: new Art. 16a).	Lines 144, 145, 147, 148 (Lines 244, 245, 247, 248) EP's position: Art. 5. (Council's position: new Art. 15a).	EE is flexible on the placement of the article (6 AMIF, 5 ISF and BMVI). We are flexible in wording as long as the principle that the enabling conditions apply to the actions not to the entities is clear.
Co-financing rates (total assistance covered below)	Lines 155, 157, 161, 162	(Lines 181-185, 187-190 agreed)	(provisionally agreed) Line 196	AMIF lines 155 and 157: we prefer the Council proposal, but can be flexible. AMIF lines 161, 162; ISF 196, 197; BMVI 188, 189 –

				EE prefers to use BMVI text for all three Funds.
Programmes	Lines 165, 169, 171, 171a, (172), 173, 173a (169 agreed)	Lines 192, 201, (203), 213, 214	Lines 200, 216, 217, 218, 219	Lines AMIF 165, BMVI 192, ISF 200 – EE prefers EP’s compromise text in BMVI and suggests to apply this wording for all three Funds. Lines AMIF 169, BMVI 201, ISF 216 – EE supports Council’s mandate, which has been provisionally agreed in AMIF and suggests applying this wording for all three Funds. Lines AMIF 171, ISF 217, BMVI 213 – EE sticks to the council’s position, it is unnecessary to limit the MS’s room of manoeuvre. AMIF line 171a: EE is flexible and can support the EP addition. Lines ISF 218, AMIF 172, BMVI 203 - EE supports Council’s mandate for AMIF and BMVI and

				suggests applying this wording for all three Funds. Lines ISF 219, AMIF 173, BMVI 214 – EE is flexible, however do not see the need to repeat the CPR stipulations. EP's amendment for AMIF 173a should be deleted - This is a horizontal issue however there are no corresponding paragraphs in the ISF and BMVI.
Specific actions (Union added value)	Line 179	Line 222	Line 226 (provisionally agreed)	Lines AMIF 179, BMVI 222, ISF 226 - For ISF this is provisionally agreed without the „bringing Union added value“. We prefer Council's proposal, but can be flexible with the EP suggestion. Wording should be the same for all three Funds.
Technical assistance	(lines 159a, 221 agreed)	lines 186, 260	lines 194, 262	Lines AMIF 159a, BMVI 186, ISF 194 - Provisional agreement reached at the AMIF technical level on 17 Feb 2020. THE reference to the CPR need to be

				corrected after the adoption of the CPR Lines AMIF 221, BMVI 260, ISF 262: Agreed for AMIF, therefore should apply for all three Funds.
Monitoring and reporting	Lines 256, 258, 260 (Art. 28) Lines 279, 280 (Art. 31)	Lines 287, 289, 291-293 (Art. 25) Lines 321-322 (Art. 28)	Lines 286, 288, 290 (Art. 24) Lines 317, 318 (Art. 27)	Lines AMIF 256, BMVI 287, ISF 286 - EE is flexible Lines AMIF 258, BMVI 289, ISF 288 – EE is flexible Lines AMIF 260, 291; ISF 290 – EE supports the Council’s position. BMVI line 292 - EE is flexible, however if this amendment is adopted, it should be applied to all three Funds. BMVI line 293 - EE does not support EP’s amendment, all projects should be treated equally. Lines AMIF 279 and 280, BMVI 321 and 322, ISF 317 and 318 - EE is flexible.
Evaluation	Lines 262 - 263l (Art. 29/29a)	Lines 295-304 (Art. 26)	Lines 292-300 (Art. 25)	Lines AMIF art 29/29a, BMVI Art 26, ISF Art 25 – EE is waiting for the EP’s

				compromise proposal. For now, we stick to the Council's position.
(poss.) Annual performance reports (CPR links; also P)	Lines 266-271, 272, 274-275, 276-277 (Art. 30)	Lines 307-312, 315, 317-319 (Art. 27)	Lines 303-308, 311, 313-315 (305 agreed) (Art. 26)	Lines AMIF Art 30, BMVI Art 27, ISF Art 26 – EE supports Council's position
Annexes V and VIII (indicators)	General discussion on possible horizontal approach.			EE is flexible.

FINLAND

HORIZONTAL: Issue	AMF (WK 2137/20)	BMVI (WK 1803/20)	ISF (WK 1799/20)
General principles	line 121 (lines 120, 122 agreed)	(lines 144-146 agreed)	line 153 (lines 152, 154 provisionally agreed)
FI comment	FI can agree in AMF to the approach taken in BMVI and ISF. We would also consider it important to maintain a horizontal approach in this paragraph in all three files.		
Scope of support (also P)	Lines 98 and 99	Lines 118 and 119	Lines 128 and 129
FI comment	FI prefers the PGA. In ISF the EP has already agreed to maintain the same structure (to keep the implementation measures in Annex II) and it would be important to keep this paragraph horizontal, too. In principle the EP proposal in AMF that the COM would be given the power to give delegated acts to modify the Annex III could be useful - if it was used to expand the scope in case there is a new need. However, there should be a safeclause that such a modification would not force the MS to modify their programmes and reallocate funding. This should be limited to provide the MS with more possibilities, not retrospectively limit the already agreed content.		
Eligible entities	Lines 112, 113, 115, 116 (Lines 204f, g, i, j) EP's position: Art. 6. (Council's position: new Art. 18a).	Lines 136, 139, 140 (Lines 243, 246, 247) EP's position: Art. 5. (Council's position: new Art. 16a).	Lines 144, 145, 147, 148 (Lines 244, 245, 247, 248) EP's position: Art. 5. (Council's position: new Art. 15a).
FI comment	FI prefers the COM and the CNS wording. The aspect of the Charter and international obligations should be dealt with an overall solution to this issue. The text in the current regulation could serve as a reference point here - for example the article 3(4) of the current ISF-B Regulation (515/2014). The EP deletion of 'third countries' in lines 113(AMF), 137(BMVI) and 145(ISF) and other limitations on third country co-operation are too much. A comprehensive approach to this should be sought in similar fashion as to the fundamental rights aspect. FI could also be flexible on the EP proposal in lines 116(AMF), 140 (BMVI) and 148 (ISF) It is important to maintain horizontal approach in these lines.		
Co-financing rates (total assistance covered below)	Lines 155, 157, 161, 162	(Lines 181-185, 187-190 agreed)	(provisionally agreed) Line 196
FI comment	FI prefers the PGA. However, terminological streamlining is very much welcome if such an effort is done. It is important to maintain horizontal approach in these lines.		

	If recitals need to be modified in order to reach an agreement, FI can be flexible as long as no new obligations are imposed on the MS.		
Programmes	Lines 165, 169, 171, 171a, (172), 173, 173a (169 agreed)	Lines 192, 201, (203), 213, 214	Lines 200, 216, 217, 218, 219
FI comment	FI can be flexible on the wording within reasonable limits as long as the text remains horizontal across the three files and as long as the changes do not impose new administrative or other obligations to the MS. The references to international obligations to be solved separately.		
Specific actions (Union added value)	Line 179	Line 222	Line 226 (provisionally agreed)
FI comment	FI can be flexible. Important to maintain horizontal approach.		
Technical assistance	(lines 159a, 221 agreed)	lines 186, 260	lines 194, 262
FI comment	The approach should remain horizontal. The text added by the CNS and included in the PGA is important to keep on board. FI is hesitant to make exhaustive lists of things that would be eligible under the technical assistance. If the EP insist on having the amendment on board, perhaps a way forward could be replacing 'namely' with 'including'.		
Monitoring and reporting	Lines 256, 258, 260 (Art. 28) Lines 279, 280 (Art. 31)	Lines 287, 289, 291-293 (Art. 25) Lines 321-322 (Art. 28)	Lines 286, 288, 290 (Art. 24) Lines 317, 318 (Art. 27)
FI comment	FI can be flexible as long as no additional administrative burden is imposed on the MS.		
Evaluation	Lines 262 - 2631 (Art. 29/29a)	Lines 295-304 (Art. 26)	Lines 292-300 (Art. 25)
FI comment	According to the 4CT the EP is supposed to present a compromise. FI upholds a scrutiny reservation until the EP text is available. In principle FI would like to stick to approach that will be agreed in the CPR. Regarding the deadline expressed for instance in BMVI 4CT, line 302, the EP proposal is way too early as the eligibility period for projects is likely to end at the end of 2029. The EP proposal would allow only a month for the MS to report and for the COM to devise an evaluation. This is simply not feasible. The comment presented in the 4CT about the possibility of the findings of the evaluation to be exploited in the preparations for the MFF post 2027 is still valid, too.		
(poss.) Annual performance reports (CPR links; also P)	Lines 266-271, 272, 274-275, 276-277 (Art. 30)	Lines 307-312, 315, 317-319 (Art. 27)	Lines 303-308, 311, 313-315 (305 agreed) (Art. 26)

FI comment	This matter is dependant on the CPR trilogues. FI would like to see the final result of the block 3 of the CPR-trilogues (of which this is part of) before taking a position here.
Annexes V and VIII (indicators)	General discussion on possible horizontal approach.
FI comment	FI can be flexible. The structure and mechanisms should remain horizontal. FI would like to highlight that the goals of the workshops on indicators (organised by the COM and RO presidency) were to devise feasible indicators that are available, easy to collect and relevant to the field.

FRANCE

- Principes généraux

FAMI	IGFV	FSI
Ligne 121 (lignes 120, 122 accord)	(lignes 144-146 accord)	Ligne 153 (lignes 152, 154 accord provisionnel)

[FAMI ligne 121] Nous nous opposons à l'amendement du Parlement, qui ajoute un principe de coordination et de complémentarité avec les financements nationaux et les autres instruments. Nous souhaitons un alignement sur la ligne 145 IGFV.

Concernant la gestion partagée, la coordination entre les autres fonds est couverte par le RPDC/CPR.

Concernant le mécanisme thématique, la rédaction initiale de la Commission nous semble suffisante.

- Champs d'application

FAMI	IGFV	FSI
Lignes 98 et 99 (art.4)	Lignes 118 et 119 (art.4)	Lignes 128 et 129

• Lignes 98 FAMI, 118 IGFV et 128 FSI

De manière transversale, nous pouvons nous montrer flexibles à la première partie de la reformulation du Parlement («*in accordance*»), à condition que la mention «*such as those*» ajoutée par le Conseil soit maintenue. Nous nous opposons à la seconde partie de l'amendement du Parlement («*that contribute to the achievement of the objectives referred to in article 3 and are*»).

[FAMI Ligne 98] Nous pouvons nous montrer flexibles quant à la possibilité pour la Commission de proposer des nouvelles actions à l'annexe III, mais nous sommes défavorables au recours à un acte délégué. Nous proposons une rédaction alternative, substituant «amend» par «add».

• Lignes 99 FAMI, 119 IGFV et 129 FSI

Nous ne sommes pas favorables aux amendements du Parlement.

Si les fonds JAI ne doivent pas être les instruments principaux de l'action extérieure de l'Union européenne en matière migratoire, ils doivent pouvoir y contribuer. Les mesures doivent être conjoncturelles et réalisées si nécessaires pour atteindre des objectifs fixés.

Nous nous opposons donc à l'instauration de plafonds de dépenses et à tous les amendements du Parlement sur cette question aux articles 4.

À titre d'exemple, les actions de réinsertion dans le cadre des programmes de retour volontaire sont des actions menées dans les pays tiers de manière régulière sur fonds FAMI, tout comme les actions de migration légale (dans le pays d'origine). Ces actions ont vocation à perdurer dans le prochain cadre.

- Entités éligibles

FAMI	IGFV	FSI
lignes 112, 113, 115, 116 EP's position: Art. 6. ((lignes 204 f, g, i, j) (Council's position: new Art.18a).	lignes 136, 139, 140 EP's position: Art. 5. (lignes 243, 246, 247) (Council's position: new Art.16a).	lignes 144, 145, 147, 148 EP's position: Art. 5. (lignes 244,245, 247, 248) (Council's position: new Art.15a).

De manière générale, nous soutenons l'orientation générale partielle du Conseil pour chacun des règlements.

• Lignes 112 FAMI, 136 et 139 IGFV et 144 FSI

Nous nous opposons à l'ajout consistant à conditionner la liste des pays tiers pouvant être financés par des actions en gestion centralisée au respect, par ces pays tiers, à la Charte des droits fondamentaux et aux «obligations internationales de l'UE et de ses États membres». Il alourdit la procédure pour mettre en place des actions dans les pays tiers de manière disproportionnée et risque de nuire à la mise en œuvre des projets financés par les fonds JAI.

• Ligne 113 FAMI

Nous pouvons nous montrer flexibles sur cet amendement visant le financement des organisations internationales.

• Ligne 115 FAMI

Nous nous opposons à cet amendement et à sa retranscription dans les trois textes.

• Lignes 116 FAMI, 140 IGFV et 148 FSI

Nous nous opposons formellement à la suppression des entités éligibles, les personnes morales dont le siège se situe dans un pays tiers, quand bien même elles feraient partie d'un consortium comportant au moins deux entités dont le siège est situé dans un État membre.

- Taux de cofinancement (assistance technique couverte ci-après)

FAMI	IGFV	FSI
lignes 155, 157, 161, 162	(lignes 181-185, 187-190 accord)	(accord provisionnel) ligne 196

• Ligne 155 FAMI

Nous ne sommes pas favorables au compromis de la Commission. Les dispositions d'un texte législatif européen n'ont pas à préciser l'action des États dans des domaines relevant de sa compétence propre.

Si cette formulation devait prospérer, nous souhaitons maintenir impérativement le terme «*encouraged*».

• Ligne 157 FAMI

Nous nous opposons à l'amendement demandant que les actions de l'annexe IV soient soumises à un plancher de cofinancement de 80%.

•

Ligne 181 IGFV

Nous continuons à nous opposer formellement à l'amendement du Parlement dégageant un taux de cofinancement plus élevé pour certains États membres sous certaines conditions de RNB qui n'est ni justifié ni proportionné.

Nous nous opposons à la retranscription d'une telle disposition dans les trois textes.

• Ligne 196 FSI

Nous soutenons la position du Conseil puisque chaque objectif fait l'objet de plusieurs taux de cofinancement en fonction du type d'action.

- Programmes

FAMI	IGFV	FSI
lignes 165, 169, 171, 171a, (172), 173, 173a (169 accord)	lignes 192, 201, (203), 213, 214	lignes 200, 216, 217, 218, 219

• Lignes 165 FAMI, 192 IGFV et 200 FSI

Ces lignes traitent des priorités dans les programmes nationaux. Alors que le Parlement souhaite intégrer des références aux droits fondamentaux et à des conventions internationales (IGFV et FAMI), en particulier la convention sur les droits de l'enfant (FAMI), nous rappelons que le respect de ces normes s'impose en vertu de normes juridiques supérieures.

Nous pourrions accepter une rédaction horizontale alignée sur la rédaction proposée par le Parlement pour la ligne 200 du FSI, et adaptée avec la mention «*while taking into account the specific context of each Member State*» dans chaque règlement. Toutefois, nous sommes en attente du compromis de la Commission à ce sujet.

[IGFV Ligne 192] Nous ne sommes pas favorables au compromis du Parlement.

• Lignes 169 FAMI, 201 IGFV, 216 FSI

Nous soutenons l'accord obtenu sur le FAMI et souhaitons une transposition horizontale à l'IGFV.

Nous soutenons la version du Conseil sur le FSI et attendons l'avis du SJC sur le choix de «*shall*» ou de «*may*».

• Lignes 171 et 171a FAMI – Ligne 213 IGFV – 217 FSI

[Lignes FAMI 171 et IGFV 213] Nous souhaitons le maintien de la souplesse (emploi de «*may*») quant à la poursuite des actions de l'annexe IV, dotées d'un taux de cofinancement majoré et soutenons l'orientation générale partielle du Conseil.

[FAMI Ligne 171a– art.13] Nous soutenons l'amendement du Parlement qui propose d'inclure les «*immediate relatives*» pour les actions de l'article 3a de l'annexe III dans les cas où cela est nécessaire à leur mise en place (périmètre de l'intégration).

• Lignes 172 FAMI – 203 IGFV – 218 FSI

Nous soutenons de manière horizontale la proposition du Conseil.

Le Conseil a un devoir d'information envers la Commission. Il serait trop rigide et hors de son mandat d'avoir son accord à chaque action menée dans ce cadre. Toutefois, si nous ne parvenons pas à conserver la notion d'information, il faudra prévoir un délai de réponse maximal de la Commission en cas de consultation de celle-ci.

Compte tenu du caractère transversal de cette obligation, la mention spécifique des droits fondamentaux est superflue.

- Lignes 173 FAMI – 214 IGFV – 219 FSI

Nous soutenons la version de la Commission, identique à celle du Conseil, qui apparaît plus claire et plus appropriée.

- Ligne 173a FAMI

Nous nous opposons à cet ajout du Parlement obligeant à la publication sur un site internet des programmes nationaux et à sa transmission au Parlement et au Conseil et à sa retranscription sur les trois textes. Elle ferait peser une charge de gestion excessive sur les administrations nationales. (ligne rouge)

- Actions spécifiques (valeur ajoutée de l'Union)

FAMI	IGFV	FSI
Line 179	Line 222	Line 226 (accord provisionnel)

[Lignes FAMI 179 et IGFV 222] Nous nous opposons à l'amendement du Parlement.

Nous souhaitons une rédaction horizontale alignée sur le FSI.

- Assistance technique

FAMI	IGFV	FSI
(lignes 159a, 221 accord)	lignes 186, 260	lignes 194, 262

[Lignes FAMI 159a, IGFV 186, FSI 194] Nous soutenons le compromis accordé à la ligne 159a du FAMI et donc une rédaction horizontale.

[Lignes FAMI 221, IGFV 260, FSI 262] Nous pouvons souscrire à une formulation horizontale reprenant la proposition de la Commission soutenue par le Conseil. Aussi, nous nous opposons à l'amendement du Parlement à la ligne 260 IGFV.

- Monitoring et reporting

FAMI	IGFV	FSI
Lignes 256, 258, 260 (Art. 28)	Lignes 287, 289, 291-293 (Art.25)	Lignes 286, 288, 290 (Art. 24)
Lignes 279, 280 (Art. 31)	Lignes 321-322 (Art. 28)	Lignes 317, 318 (Art. 27)

- Lignes 256 FAMI, 287 IGFV et 286 FSI

Nous saluons et encourageons une rédaction convergente, conforme à la proposition du Conseil.

- Lignes 258 FAMI, 289 IGFV (et 288 FSI)

Nous nous opposons aux amendements du Parlement, qui feraient porter sur les États membres une contrainte lourde, faisant obstacle à la bonne gestion des fonds.

- Lignes 260 FAMI, 291 IGFV et 290 FSI

Nous continuons à soutenir cet amendement du Conseil qui relève d'une bonne pratique et permettra une application homogène et effective de ces éventuels amendements.

- Lignes 289, 292 et 321-322 IGFV, 258 et 279-280 FAMI et 288 et 317-318 FSI

[Lignes FAMI 258, IGFV 289, FSI 288] Nous ne sommes pas favorables à l'amendement du Parlement. La charge sera reportée sur les États membres *in fine*, faisant obstacle à tout allègement de la gestion administrative.

[Lignes FAMI 279-280, IGFV 321-322, FSI 317-318] Nous soutenons la position de l'orientation générale partielle du Conseil.

- Ligne 293 IGFV

Nous nous opposons à cet amendement et sa retranscription sur les trois textes.

Il n'est pas proportionné et pourrait créer des difficultés pour les autorités de gestion.

- **Évaluations**

FAMI	IGFV	FSI
Lignes 262 - 2631 (Art. 29/29a)	Lignes 295-304 (Art. 26)	Lignes 292-300 (Art. 25)

Nous nous opposons au nouvel article du Parlement et continuons de soutenir la version du Conseil en cohérence avec le RPDC / CPR.

Les propositions du Parlement sont disproportionnées en ce qu'elles ajoutent des contraintes supplémentaires par rapport au RPDC / CPR.

- **Annexes V et VIII (indicateurs) : Discussion générale sur une possible approche horizontale.**

Nous ne sommes pas favorables à une fusion des annexes V et VIII.

De manière générale, nous sommes favorables à une simplification et une limitation du nombre d'indicateurs.

HUNGARY

AMF - lines 121, ISF – 153 General principles

Hungary proposes to include the compromise text of Article 6 (2) of the BMVI (line 145) into the line 121 of AMF and into the line 153 of ISF.

“The Commission and the Member States shall ensure that the support provided under this Regulation and by the Member States is consistent with the relevant activities, policies and priorities of the Union and is complementary to other Union instruments.”

AMF - lines 98, 99, BMVI - 118, 119, ISF – 128, 129 Scope of support

Given the fact that both funds and the instrument have the same text Hungary supports the Council mandate at both of the lines.

AMF - lines 112, 113, 115, 116 (204 f, g, i, j), BMVI - 136, 139, 140 (243, 246, 247), ISF - 144, 145, 148 (244, 245, 247, 248) Eligible entities

We would like to stick to the Council mandate.

AMF- lines 155, 157, 161, 162 Co-financing rates

AMF -lines: 155 and 157 Hungary supports the Council’s mandate. Line 161, 162 Hungary accepts the compromised proposal.

BMVI-line Hungary supports the proposal of EP.

AMF- lines 165, 169, 171, 171a, (172) 173, 173a, BMVI - 192, 201, (203), 213, 214, ISF- 200, 216, 217, 218, 219 Programmes

Regarding the lines 165-AMF, 192-BMVI, 200-ISF Hungary supports the Council mandate.

Line 169-AMF Until agreement is not reached on line 168, we cannot take a resolution.

Line 201-BMVI, line 216-ISF Hungary supports the Presidency’s compromised suggestion in both lines:

“Where necessary, the programme in question shall be amended to take into account the recommendations referred to in paragraph 5. The revised programme shall be approved by the Commission in the cases referred to in Article 19 of Regulation XXX [CPR]”

Line 171, 171a-AMF, 213-BMVI, 217-ISF Hungary supports the Council’s mandate.

Line 172 of AMF, line 203 of BMVI, line 218 of ISF – Hungary supports the Council’s mandate of AMF and BMVI and the use of the same text at the line 218 of ISF:

“Whenever a Member State decides to implement new projects with or in a third country with the support of the fund/instrument, the Member State concerned shall approve the project after informing the Commission.”

Line 173 AMF- Hungary supports the Council’s mandate.

Line 213 BMVI- Hungary supports the Council’s mandate.

Line 214 of BMVI, line 219 of ISF - In the template of the National Programme are clear instructions, Hungary supports the Council’s mandate.

AMF- line 179, BMVI- line 222 **Specific actions**

Hungary supports the Council's mandate.

BMVI-lines 186, 260, ISF-lines 194, 262 **Technical assistance**

Line 186 of BMVI and line 194 of ISF – since reading this paragraph there is already a provisionally agreed text in the AMF proposal, we suggest the use of same wording in the other two proposals.

Line 260 of BMVI and line 262 of ISF- Hungary supports the Council's mandate, but we can also support a cross reference to CPR in the spirit of compromise.

AMF- lines 256, 258, 260, 279, 280, BMVI - lines 287, 289, 291-293, 321-322, ISF- lines 286, 288, 290, 317, 318 **Monitoring and reporting**

Lines 256, 258, 260 of AMF, lines 287, 289, 291 of BMVI and lines 286, 288, 290 of ISF - Hungary supports the Council's mandate.

Lines 292, 293 of BMVI – We think that the EP amendments are already covered by other paragraphs. In this regard Hungary supports the Council's mandate.

Lines 279, 280 of AMF, lines 321, 322 of BMVI, lines 317, 318 of ISF – Hungary supports the Council's mandate.

AMF lines 262-263l; BMVI lines 295-304; ISF lines 292-300 **Evaluation**

The proposal of the EP means extra administrative burden for Member States, especially the line 263i of AMF, line 301 of BMVI, line 298 of ISF which includes an examination of the ex post effects of the period 2014-2020. Such a survey may be useful, but requires a delay of the mid-term review. Hungary does not support the inclusion of this element.

Line 263j of AMF, line 302 of BMVI, line 299 of ISF – According to Article 38 of CPR the final performance report shall be submitted to the Commission by 15 February 2031. Thus, the date designated by the EP (31 January 2030) for preparation of retrospective evaluation is not coherent with the CPR regulation.

We understand the EP's intention to improve but we do not support the EP's proposals.

AMF lines 266-271, 272, 274-275, 276-277; BMVI lines 307-312, 315, 317-319; ISF lines 303-308, 311, 313-315, **Annual performance reports**

Hungary supports the Council's mandate. In line BMVI 317 we can support the amendment proposed by the EP, but it is not clear why does it only appear in the BMVI.

Annexes on indicators (V and VIII)

Hungary supports the Council's mandate. Each of annex has a designated purpose and obligations, the purest situation is when they are listed in a separate annexes.

PORTUGAL

General principles

PT supports the reference to the necessary coordination between Home Affairs Funds and measures funded under national funds and other Union funds, in particular the structural funds and external financing instruments of the Union.

Nevertheless, it is important to underline that this coordination should take place at a strategic level and not at an operational level, given the high number of public measures and programs existing in PT and, certainly, in other Member States.

Scope of support:

Regarding paragraph 1, PT supports the European Parliament's proposal as long as it is unequivocal that the list of actions in Annex III is merely indicative. Regarding paragraph 2, PT does not oppose.

Eligible entities:

PT supports the reference to the observance of fundamental rights. Regarding the introduction of the term “relevant” international organizations, in principle PT does not oppose, but PT would like to know how the European Parliament wants the relevance of an IO to be assessed.

Co-financing rates:

PT supports the text of the Council's Partial general approach.

Programmes:

Linha 165 – PT awaits the European Parliament's compromise text. In the meantime, PT continues to support the Council's Partial General Approach, where reference to the specific context of each Member State was introduced.

Linha 169 – Regarding the actions in Annex IV (higher co-financing rates), PT continues to support the Council's Partial general approach.

Linha 171a – PT supports the European Parliament's proposal.

Linha 172 – PT continues to support the Council's Partial general approach.

Linha 173 – PT does not oppose to the breakdown of financial data by type of intervention.

Linha 173a – PT supports the European Parliament's proposal on publicizing the national program and the support granted. However, it is worth remembering that there are projects whose advertising will naturally be very limited, given the nature of their actions.

Specific actions:

PT supports the reference to European added value.

Technical assistance:

PT continues to support the text of the Council's Partial general approach, ie 100% financing for technical assistance.

Monitoring and reporting:

PT does not oppose that the data received by the Commission on output and result indicators shall be made available to the European Parliament and to the Council.

PT continues to support the text of the Council's Partial general approach, that is, any amendment to Annex VIII should only be applied in the financial year following its approval in a delegated act.

Evaluation:

PT awaits the proposal for a compromise text.

Annual performance reports:

PT supports the existence of annual reports. Choosing meetings with COM will undoubtedly involve the delivery of reports and more complex data preparation.

PT does not oppose the introduction of a reference to cooperation and solidarity between Member States in the field of asylum.

As for the inclusion of a reference to the Fund's communication and visibility actions, PT is flexible regarding its existence or not.

Regarding a reference to people resettled and “admitted”, PT does not oppose the European Parliament's proposal.

Regarding the sending of a summary or, in its absence, of the full version of the report to the European Parliament and the Council, by COM, PT does not oppose.

Annexes V and VIII (indicators):

As for the European Parliament's proposal to merge Annexes V (common indicators) and VIII (national indicators), PT does not oppose as long as there are no doubts, in a future single annex, about the typology of indicators and the responsibility for their collection, treatment and reporting.

It is important to underline that PT values and is committed to improving its M&E system (monitoring and evaluation), focusing it on the achievements and results obtained with community financing. This improvement will be based on principles of proportionality, reasonableness, efficiency and cost-benefit. Therefore, a possible merger of the aforementioned annexes cannot, under any circumstances, result in a disproportionate increase in administrative work for PT and, of course, for the other Member States

SLOVAKIA

AMF

Line 121 – flexibility

Line 98, 99 - political

Line 112, 113, 115, 116 - political

Line 155, 157, 161, 162 – political

Line 165, 169, 171, 171a, 172, 173, 173a – preference for the COM's proposal but flexibility at the same time, 171a, 172, 173, 173a - political,

Line 179 – preference for the COM's proposal but flexibility

Line 256, 258, 260 – flexibility;

Lines 262 – 263L- political, regarding technical issues preference for the COM's proposal

Lines 266 – 271, 272, 274 – 275, 276 – 277 – political (266, 271, 272, 274, 275, 276, 277), in rest of the provisions - flexibility

References to Charter and international obligations of Member States – it will be solved at political level

Reference to gender equality and non-discrimination (Article 4a - lines 100 and 100b) preference for EP's text, but flexibility.

Partnership (Article 3a - lines 96a, 96b and 96c) – EC – the discussion at the political level is needed

Support to international organisation (Article 9 - line 135) – preference for the COM's text, but flexibility

Co-financing NGO Projects (Article 12 - line 155) - preference for the COM's text, agreement with the text in recital 17, at the same time flexibility

Adding “immediate relatives” (Article 13 - line 171a) - flexibility

Projects in third countries (Article 13 - line 172) - political

Involvement of EU Agencies in assessment of baseline situation (Article 18 - line 201) - political

Institutional care and reference to children / minors (Annex IV - Line 389 and 391) – preference for the COM's text, at the same time flexibility

Terminology (Article 18 - lines 202 and 203) – preference for the COM's text, at the same time flexibility

BMVI

Scope of support:

Line 118 – flexibility

Line 119 – flexibility

Eligible entities:

Lines 136, 243, 139, 140, 246, 247 – flexibility, preference of the Council's text in article 16a

Co-financing rates:

Line 181 – flexibility

Line 182 – 185 – flexibility

Line 187 - 190 – flexibility

Programmes:

Lines 192, 201, 203, 214 – flexibility

Line 213 – support of the Council's text

Specific actions (union added value):

Line 222 – flexibility

Technical assistance:

Line 186 – agreement with added 5a

Line 260 – support of the Council's text, at the same time flexibility

Monitoring and reporting:

Line 287 – flexibility, support of the Council's text

Line 289 – support of the Council's text

Line 291 – support of the Council's text, at the same time

Line 293 – flexibility

Line 321 – 322 – flexibility, at the same time support of the Council's

Evaluation:

Lines 295 – 304 – political level

Annual performance reports:

Lines 307 – 312 – support of the Council's text, at the same time flexibility

Line 315 – support of the Council's text, at the same time flexibility

Line 317 – 319 – flexibility

Annex V a VIII: political level

ISF

General principles:

Line 153 = without any comments

Lines 152, 154 = without any comments

Scope of support:

Line 128 – flexibility

Line 129 – flexibility

Eligible entities:

Lines 144, 145, 147, 148 (244,245, 247, 248) = flexibility, preference of the Council's text in the article 15a

Co-financing rates:

Line 196 = flexibility

Programmes:

Line 200 = flexibility

Lines 216, 217 = support of the Council's text, at the same time flexibility

Lines 218, 219 = support of the Council's text, at the same time flexibility

Specific actions (Union added value):

Line 226 = agreement, flexibility

Technical assistance:

Line 194 = agreement with addition of 5a

Line 262 = flexibility and at the same time support of the Council's text

Monitoring and reporting:

Lines 286, 288, 290 = flexibility

Lines 317, 318 = support of the Council's text, at the same time flexibility

Evaluation:

Lines 292 – 300 = political level

Annual performance reports:

Lines 303, 304 = political level

Lines 306 – 308 = flexibility

Lines 311, 313 - 315 = political level

SPAIN

HORIZONTAL PROVISIONS				
ISSUE	AMF (WK 2137/20) Article + Line n°	BMVI (WK 1803/20) Article + Line n°	ISF (WK 1799/20) Article + Line n°	COMPROMISE TEXT PROPOSAL AND/OR COMMENT
General principles	Line 121 (lines 120, 122 agreed)	(lines 144-146 agreed)	Line 153 (lines 152, 154 provisionally agreed)	ISF - Line 153: The Kingdom of Spain could accept Council or Commission proposals. BMVI - Line 144: The Kingdom of Spain can accept compromise proposal. - Line 146: Spain can support Commission proposal.
Scope of support (also P)	Lines 98 and 99	Lines 118 and 119	Lines 128 and 129	ISF : The Kingdom of Spain prefers Council proposal and, in this sense, would like to give Annex II an indicative consideration and not a closed listing in order to be able MS and COM to tackle correctly possible unseen new situations during 2021-2027 period. BMVI - Line 118 Texto del Consejo. - Line 119 Texto del Comisión.
Eligible	Lines 112, 113, 115,	Lines 136, 139, 140	Lines 144, 145, 147, 148	ISF : The Kingdom of Spain would like a unique clear article and, hence, prefers EP drafting. On another aspect, we would like Council Presidency or Commission to explain the relation

entities	116 (lines 204f, g, I, j) EP's position: art. 6 (Council's position: new Art. 18a)	(lines 243, 246, 247) EP's position: Art. 5 (Council's position: new Art. 18a)	(Lines 244, 245, 247, 248) EP's position: art. 5 (Council's position: new art. 15a)	established among eligibility (article 5) and visibility (article 15a). - Line 144: On a one side, Spain could accept EP position on actions' eligibility, but does not agree with its position on entities. - Line 145: Spain support Council position on this issue. - Line 147: Spain has no objections. - Line 148: Spain could accept Commission opinion. BMVI: The Kingdom of Spain could support Council or Commission drafting's. On another aspect, we would like Council Presidency or Commission to explain the relation established among eligibility (article 5) and visibility (article 18).
Co-financing rates (tcal assistance covered below)	Lines 155, 157, 161, 162	(Lines 181-185, 187-190 agreed)	(provisionally agreed) Lines 196	ISF. The Kingdom of Spain could support Commission or EP drafting's. However, concerning the co-financing rate it prefers to link it to specific objectives by action. BMVI: - Line 185: The Kingdom of Spain prefers EP drafting. - Line 186: Spain supports Council and Commission positions. - Lines 187 and 190: Spain supports compromise proposal.
Programmes	Lines 165, 169, 171, 171a, (172), 173, 173a	Lines 192, 201, (203), 213, 214	Lines 200, 216, 217, 218, 219	ISF: - Lines 200, 2016 and 2017: The Kingdom of Spain awaits law expert opinion on "may" or "shall" discussion, but prefers the less discretionary option for the Commission on this matter. - Line 218: Spain prefers Commission proposal aiming Council drafting flexibility.

	(169 agreed)			- Line 219: Spain can support Commission drafting. BMVI: - Line 192: Spain considers that EP compromise text includes Commission concerns. - Line 201: So long as <i>ex ante</i> conditions are fulfilled, the Kingdom of Spain is in line with Presidency suggestion. - Line 203: Spain maintains Council drafting on this matter. - Line 213: Spain maintains Council drafting on this matter. - Line 214: Spain does not foresee an overlap with CPR.
Specific actions (Union added value)	Line 179	Line 222	Line 226 (provisionally agreed)	ISF: The Kingdom of Spain has no objections. BMVI: Line 222 – Spain can support Council or Commission drafting’s as well as the inclusion of “added value” concept proposed by EP.
Technical assistance	(lines 159a, 221 agreed)	Lines 186, 260	Lines 194, 262	ISF: The Kingdom of Spain could accept compromise proposal. BMVI - Line 186: The Kingdom of Spain maintains Council position on this issue and, hence, asks for its coherence with CPR. - Line 260: Spain can support Council or Commission draftings.
Monitoring and reporting	Lines 256, 258, 260 (art. 28)	Lines 287, 289, 291-293 (Art. 25)	Lines 286, 288, 290 (Art. 24)	ISF - Lines 286 and 288: - Line 288

	Lines 279, 280 (art. 31)	Lines 321-322 (art. 28)	Lines 317, 318 (art. 27)	- Line 317 and 318: 286 y 288. El texto de la COM es el más interesante. 288: No vemos ningún problema en incluir la enmienda del texto para la difusión de los indicadores de cumplimiento 317 y 318. El texto de la COM es el más interesante BMVI - Line 287: Spain prefers EP drafting. - Line 289: Spain can support COM or Council draftings. - Line 291: Spain can support EP and COM draftings. - Line 293: Spain prefers EP drafting. As a general comment, the Kingdom of Spain maintains its position on the need to reduce administrative burden for management Authorities avoiding, among other, an excessive obligation on “<i>reporting</i>” taking account their capacities limitations.
Evaluation	Lines 262-2631 (art. 29/29a)	Lines 295-304 (art. 26)	Lines 292-300 (art. 25)	ISF: The Kingdom of Spain prefers Council or Commission proposals. - Line 292: Spain shares Commission point of view given the uncertainty about the first step of FF implementation. BMVI: The Kingdom of Spain prefers Council or Commission proposals. As a general comment, Spain is of the opinion that evaluation obligation should be carried out by the Commission for the sake of greater efficiency, even if it would suppose a <i>de facto</i> evaluation of management authority.

(poss.) Annual performance reports (CPR links, also P)	Lines 266-271, 272, 274-275, 276-277 (art. 30)	Lines 307-312, 315, 317-319 (art. 27)	Lines 303-308, 311, 313-315 (305 agreed) (art. 26)	ISF - Line 303: Spain has no opinion on the matter. - Line 308: The Kingdom of Spain prefers Council or Commission proposals. - Line 311, 313,315: Spain prefers Commission proposal. As a general comment to lines 303-308 and 311, Spain insists on the need to reduce “reporting” obligations to avoid excessive administrative burden given the great workload and scarce resources of the National management authorities. BMVI: Spain prefers Commission text. - Line 307: Spain has no opinion on the matter. - Line 312: Spain prefers COM text.
Annexes V and VIII (indicators)	General discussion on possible horizontal approach (EP has suggested to merge both of them into one single Annex).			As long as indicators do not suffer any change, Spain could accept having two annexes or merging both of them. On this concern, we kindly ask the Presidency to inform on the follow up of this matter during next JHA meeting.