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WORKING PAPER

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Delegations
Subject:	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 - Comments from delegations

Following the request for contribution (CM 2050/20), delegations will find attached a compilation of replies received from Member States on the abovementioned subject.

Written comments submitted by the Member States

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 - Presidency drafting suggestions

WK 4094/20

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BULGARIA

We will support your approach



AUSTRIA

Article 3 Objectives

Paragraph 2 (line 113)

Prevention should be further strengthened and pointed out in this context.

Article 4 – Scope of support

Paragraph 2a (line 120)

AT wants to point out the importance of a high flexibility on the use of multipurpose equipment and ICT systems between the BMVI, ISF, and AMF since there are many synergies between these funds. This would ensure the efficient use of equipment and ICT systems, could prevent the necessity of buying or acquiring the same equipment/systems under different funds, support the ECs priority on overall interoperability and thus would ensure a cost-effective use of EU taxpayers' money.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

AT can agree on the proposals wording for this paragraph.

Article 12 – Programmes

Paragraph 12 (line 207)

AT views this critically as through this the acquisitions of any large scale IT system is quite dependable on the assessment of the EBCG and it is not stated as of how long the EBCG may take for these assessments.

Annex III

AT can agree on the relocation of this part.

Paragraph 1 (line 413)

AT supports these changes.

Annex IV

Paragraph 5 (line 453)

AT can agree with the proposals changes on this.

BELGIUM

Article 4 – Scope of support

Paragraph 2a (line 120)

We believe that the proposal will enhance the administrative burden and will make the purchase of multi-purpose equipment even more complex. For instance, if Belgium buys a ship that is used 70% for border surveillance, 10% for fisheries controls, 10% for SAR activities and 10% for anti-terrorism actions, this means that the beneficiary will need to have 4 subvention agreements with the 4 sponsors who all have their own rules and demands. Moreover, the distribution key would have to be defined beforehand. This complicates the whole exercise seriously. We also support the comments of Estonia in this regard (see annex).

We would therefore request you to **go back to the Council general approach for this paragraph 2a**, which was satisfactory to us.

CZECHIA

Article 3 Objectives

Paragraph 2 (line 113)

The CZ can support the new wording.

Article 4 – Scope of support

Paragraph 2a (line 120)

The CZ does not support the new wording. New suggested wording means completely different thing than the one proposed by Council. Art 57 (9) of the CPR is neither a simplification nor a novelty. The aim of the Art 4 (2a) was to decrease administrative burden while using EU Funds efficiently. CPR Art 57 (9) allows financing equipment from different Funds and therefore enables to use it for different purposes, however the administrative burden is enormous. The CZ fully supports the EE and their Non-Paper from 30. 1. 2020. The Council proposed wording would bring flexibility, reduction of administrative burden and efficient usage of taxpayer's money. The new suggested wording would not bring anything only increase of administrative burden.

The Council's position on Art 4 (2a) is based on expansion of Commission's initial proposal for BMVI Art 12(12)(C). The Commission proposed that if within a year the equipment is used 60% for border surveillance operations, it can simultaneously be used for other maritime operations, which are out of the scope of BMVI. This kind of equipment can be financed from BMVI in full. Of course it still needs to be proven that 60% is used for border surveillance, but there will be only a single reporting both for the beneficiary and for the RA. At first, our proposal was to expand this outstanding simplification to all other domains (including to the Structural Funds) to get the maximum benefit while using EU money. During the negotiations while listening the COM's concern that Member States might start to take advantage of this opportunity and a lot of money would be spent for other EU priorities out of the BMVI's scope, the Council looked for a compromise. As a result, Member States agreed to limit the scope of multipurpose equipment to ISF, AMIF and BMVI priorities. So, as things stand, we have already met the Commission half way and we are not satisfied with the possibility to use only Art 57 (9) of CPR (the solution that already exists in the current period and that we have used) for purchasing multipurpose equipment. With Art 4 (2a) in the BMVI regulation proposed by the Council, the beneficiaries still need to prove that these multi-purpose IT systems and equipment are primarily used for border surveillance. But this would be a single project, fully financed from one Fund and there would be a „single window“ for applying even in those countries where the BMVI and ISF are managed by separate RAs. There would not be multiple reporting requirements, which is a big step forward.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

The CZ can support the proposed wording.

Article 12 – Programmes

Paragraph 12 (line 207)

The CZ can support the proposed wording

Annex III

Paragraph 1 a) (line 411)

The CZ can support the proposed wording.

Paragraph 1 c) (line 413)

The CZ can support the proposed wording

Annex IV

Paragraph 5 (line 453)

The CZ can agree with the proposed wording with minor amendments, which will also reflect on the initial idea of this paragraph, i.e. combatting cross-border criminals:

Measures within the framework of border control enhancing the identification of and the immediate support to vulnerable persons, ~~and unaccompanied minors, including in particular unaccompanied minors~~ and victims of trafficking in human beings, as well as developing and supporting adequate referral mechanisms for these target groups and measures in the framework of border control enhancing cross-border cooperation for detecting traffickers and migrant smugglers.

ESTONIA

Article 3 Objectives

Paragraph 2 (line 113)

EE is flexible.

Article 4 – Scope of support

Paragraph 2a (line 120)

EE stands by the Council's position (see Estonian non-paper below).

Presidency's wording suggestion not only reiterates the CPR but changes the whole concept. Art 57 (9) of the CPR is not a simplification nor a novelty. The aim of the Art 4 (2a) was to decrease administrative burden while using EU Funds efficiently. CPR Art 57 (9) allows financing equipment from different Funds and therefore enables to use it for different purposes, however the administrative burden is enormous.

1) Funds have different rules and there are often even different administrations who manage the Funds. For example, in Estonia the ERDF is managed by the Ministry of Finance, the ISF by the Ministry of the Interior and the EMFF is managed by the Ministry of Agriculture. That means that, if a helicopter is financed from 3 funds on pro-rata bases there have to be 3 separate grant agreements because each ministry can take financial responsibilities only for the areas that are under their jurisdiction. Each fund has different set of rules, different reporting requirements, different IT systems. This burden remains with the Art 57 (9) of the CPR, and the beneficiaries are reluctant to implement such kind of projects and prefer to buy double equipment instead.

2) If there is only one RA responsible for different funds like the Estonian Ministry of the Interior is for ISFB and ISFP, and there is only one Grant Agreement, the workload for the beneficiary is mostly the same as if the project was financed from one fund. The beneficiary just needs to pre-define and justify the apportionment in the project application, prove it during the implementation and report it in separate budget lines but still in the same report. The problem is that sometimes it is difficult to pre-define usage apportionments of new IT-systems and equipment and sometimes there is just an acute need to use equipment for other purposes, which currently is not allowed.

The Council's position on Art 4 (2a) is based on expansion of Commission's initial proposal for BMVI Art 12(12)(C). The Commission proposed that if within a year the equipment is used 60% for border surveillance operations, it can simultaneously be used for other maritime operations, which are out of the scope of BMVI. This kind of equipment can be financed from BMVI in full. Of course it still needs to be proven that 60% is used for border surveillance, but there will be only a single reporting both for the beneficiary and for the RA.

At first, our proposal was to expand this simplification to all other domains (including to the Structural Funds) to get the maximum benefit while using EU money. During the negotiations while listening the COM's concern that Member States might start to take advantage of this opportunity and a lot of money would be spent for other EU priorities out of the BMVI's scope, the Council looked for a compromise. As a result, Member States agreed to limit the scope of multipurpose equipment to ISF, AMIF and BMVI priorities. So, as things stand, the Council has already met the

Commission half way and EE is not satisfied with the possibility to use only Art 57 (9) of CPR (the solution that already exists in the current period and that we have used) for purchasing multipurpose equipment.

With Art 4 (2a) in the BMVI regulation proposed by the Council, the beneficiaries still need to prove that these multi-purpose IT systems and equipment are primarily used for border surveillance. But this would be a single project, fully financed from one Fund with one set of rules and reporting requirements and there would be a „single window“ for applying even in those countries where the BMVI and ISF are managed by separate RAs.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

EE supports the Presidency's wording suggestion.

Article 12 – Programmes

Paragraph 12 (line 207)

EE prefers Council's position, however could support the Presidency's drafting suggestion, if the time limit is set to the Agency for the verification.

Annex III

Paragraph 1 a) (line 411)

EE can support Presidency's proposal.

Paragraph 1 c) (line 413)

EE can support Presidency's proposal.

Annex IV

Paragraph 5 (line 453)

EE can support Presidency's proposal.



Non-Paper of Estonia

MULTIPURPOSE USE OF EQUIPMENT AND ICT SYSTEMS

Introduction

Recently several important initiatives were introduced and legislation adopted to better protect the European Union's (EU) external borders, improve the management of migration, and enhance internal security, e.g. a framework for interoperability between EU information systems. Now the regulations have to be implemented, which means that resources are needed.

On 12 June 2018 the European Commission (EC) proposed three funding instruments for 2021–2027: the Border Management and Visa Instrument as part of the Integrated Border Management Fund (BMVI), the Asylum and Migration Fund (AMF), and the Internal Security Fund (ISF). Though the proposals increase the funds available for these policy areas, it is still necessary to ensure the efficient use of the funds and face the challenge of EU budgetary constraints, without making any compromises in the results.

This non-paper proposes a simplification that increases the flexibility and synergy between these funding instruments. Simplification and flexibility are objectives that the EC, Member States as well as the European Parliament (EP) emphasize and wish to pursue.

Current situation

Currently, equipment financed under a particular fund can only be used for the specific objectives of that fund. This constraint causes additional costs (incl. maintenance costs) even to the extent that the same equipment may need to be purchased more than once for the different funds uses. There is also an increase in administration with multiple applications, grant agreements, reporting and other requirements for the different funds. This is especially an issue for smaller countries where border surveillance, migration surveillance and law-enforcement tasks are carried out by the same authority.

Some examples from the 2014–2020 period illustrate the inefficient use of resources and duplication of efforts when financing equipment that has multiple potential uses.

1. Different sets of fingerprint scanners for taking fingerprints during asylum procedures (funded by AMIF ^[1]) and for migration surveillance (funded by ISFB ^[2]) had to be procured. In Estonia, both procedures can be performed in police stations. The police officers need to choose between two adjacent scanners which have the same technical characteristics but from different funds. As the source of funding differs for each scanner, the officer needs to select the scanner that corresponds to the target group of the particular fund for the costs to be eligible.
2. The Schengen Information System had to be financed partially from ISFP ^[3] (development involving the systems used to share information for law enforcement and security cooperation) and partially from ISFB (development involving border control systems). Because two funds are used, separate grant applications are needed, two separate agreements signed, and then double reporting and controls, though it is a single system that contributes to the Union priorities. This sort of multiple apportionment and administration becomes particularly difficult in the case of the new interoperability package and its interrelated information systems and the cross-usage of data.
3. Border guard vehicles were purchased to be used only for border management. This means that for example in the case of human traffickers caught near the border, a different vehicle needs to be sent to pick them up if they had not violated the border regime.

The proposed solution - multipurpose use of equipment and ICT systems

For the next financing period, the EC made a step forward and proposed the possibility to use the equipment purchased for external border surveillance to also be used for other maritime operations^[4]. Such a multipurpose approach is more flexible than the current situation and helps to save some resources. However, the proposal is limited and given all the areas of multiple uses and restraints, a bigger step would be even more useful and the simplification could be expanded to other domains.

Cooperation and coordination between authorities in the field of migration and security are crucial to make integrated border management a success. These are authorities dealing with asylum, migration management, return, and cross-border crime, as well as maritime security and surveillance. To strengthen, complementarity, to reinforce the consistency of activities, to avoid duplication of efforts, and to make the best use of the available funds BMVI should support multipurpose/objective operations where the main objective is border surveillance but other objectives are pursued simultaneously.

Additionally, instead of keeping the border-equipment unused when there is no border incident, it could be used for acute migration and internal security tasks. Thus, the investment, which was made under one fund to pursue its specific objectives, would serve a wider purpose without additional costs and therefore provide EU-wide added value.

¹ Asylum, Migration and Integration Fund

² Internal Security Fund – the instrument for financial support for external borders and visa

³ Internal Security Fund – instrument for financial support for police cooperation and preventing and combating crime, and crises management

⁴ EC proposal for the BMVI Art 12(12)(c)

The EP has proposed an amendment to all three regulations stating that „The implementation of the instrument should be guided by the principles of efficiency, effectiveness, and quality of spending. Furthermore, the implementation of the instrument should be as user-friendly as possible. “^[5]

The EC proposed several flexibility elements for the next multiannual financial framework. **By including the multipurpose use of equipment and ICT systems between the BMVI, ISF, and AMF, the EU takes a forward-looking decision, which is more flexible and cost-effective use of EU taxpayers’ money.** This proposal was widely supported by most of the Member States and was included in the Council mandate for ISF and BMVI regulations.

Lastly, this proposal will also have an effect on tackling climate change. Due to targeted and specific goals, BMVI and ISF are not the main funds to contribute to mainstreaming climate actions and supporting climate objectives. However, using one asset for multiple purposes is less burdensome on the environment than using multiple individual assets for individual actions and single objectives.

⁵ BMVI recital 37 [Am. 34], ISF recital 24 [Am. 18], AMF recital 33 [Am. 43],

FINLAND

Article 3 Objectives

Paragraph 2 (line 113)

FI can be flexible on this.

Article 4 – Scope of support

Paragraph 2a (line 120)

FI prefers the PGA. The proposed wording reduces the multipurpose-aspect to the exploitation of several funds for one purchase whereas the idea was that one fund could be used to pursue the objectives of all three provided that the main purpose remains within the scope of a particular fund.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

FI can be flexible.

Article 12 – Programmes

Paragraph 12 (line 207)

FI thinks it's positive that 'large-scale equipment' remains in the text. Alignment with the EBCG-regulation is positive, too. However, FI would like to maintain certain safeguards that were introduced in the PGA, namely the application of the standards only in cases where they have been in place before the purchase and also to maintain the possibility to agree otherwise with the Agency.

FI therefore proposes the Presidency's text to be modified as follows: "before launching the purchase procedures to acquire large-scale operating equipment and communication systems with the support of the instrument, the Member States shall ensure that these equipment and systems meet the technical standards defined by the European Border and Coast Guard Agency in close cooperation with the Members States and the Commission, where such standards exist **prior to the start of the purchase procedure and unless agreed otherwise with the Agency**. The European Border and Coast Guard Agency shall ensure the compatibility and interoperability of the equipment or communication systems following a request from the Member State to the Agency to verify the technical specifications;"

Annex III

Paragraph 1 a) (line 411)

FI can be flexible.

Paragraph 1 c) (line 413)

FI can be flexible.

Annex IV

Paragraph 5 (line 453)

FI can be flexible.



FRANCE

Article 3 Objectives

Paragraph 2 (line 113)

Nous émettons une réserve d'examen sur cette question.

Article 4 – Scope of support

Paragraph 2a (line 120)

Cela ne correspond pas à l'ambition du Conseil relative aux équipements et systèmes d'information poursuivant plusieurs objectifs. Il faut qu'une prise en charge financière intégrale par l'IGFV soit ouverte pour ces actions quand elles sont majoritairement mises en œuvre dans le cadre des objectifs du fonds.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

Nous n'avons pas d'opposition.

Article 12 – Programmes

Paragraph 12 (line 207)

Les modifications proposées par la Présidence vont dans le bon sens. Cependant, nous continuons de soutenir la position de l'Orientation générale partielle du Conseil.

Nous ne pouvons pas soutenir ce compromis dans son intégralité tant qu'il ne sera pas spécifié que les standards techniques applicables sont ceux en place avant le début de la procédure d'achat.

Annex III

Paragraph 1 a) (line 411)

Nous pouvons soutenir ce compromis.

Paragraph 1 c) (line 413)

Nous pouvons soutenir ce compromis.

Annex IV

Paragraph 5 (line 453)

Nous soutenons pleinement ce compromis.

GERMANY

Annex IV

Paragraph 5 (line 453)

We recommend to clarify that "unaccompanied minors" also belong to the group of "vulnerable persons" by rephrasing the sentence:

"... to vulnerable persons, including unaccompanied minors and victims of trafficking in human beings, as well as ..."

HUNGARY

Hungary supports all proposals initiated by the Presidency.



ITALY

We keep a scrutiny reservation.



LATVIA

Latvia has no objections to most of the proposed compromise texts in the given document. However, Latvia would like to express concerns about the proposed wording in Article 4 paragraph 2a. Taking into account that it is almost impossible to pre-define precise proportions of IT Systems or equipment usage purpose. By applying the CPR Article 57 (9) to Home Funds, where the synergies between the three funds are common, the administrative burden concerning purchasing of multipurpose equipment would be enormous. The aim of the Art 4 (2a) was to decrease administrative burden while using EU Funds efficiently, therefore Latvia cannot support proposed Presidency compromise on Article 4 (2a), and instead we prefer the Council proposal in the given Article.

THE NETHERLANDS

First of all we would like to support the proposal made by the Estonian delegation on BMVI Art 4 (2a) - multipurpose use.

Article 3 Objectives

Paragraph 2 (line 113)

The NL supports this proposal

Article 4 – Scope of support

Paragraph 2a (line 120)

The NL supports this proposal

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

The NL supports this proposal

Article 12 – Programmes

Paragraph 12 (line 207)

The NL requests some clarification regarding line 207 since we have two comments:

- the wording of “large-scale” for “operating equipment” is not in concurrence with article 64 of the EBCG regulation. In the EBCG regulation it’s not solely large-scale equipment, but all technical equipment which can be used en acquired for Frontex operations by MS and/or Frontex.
- the wording “interoperability and compatibility” are correctly mentioned regarding “technical equipment” in article 64 van de EBCG regulation. However this is not applicable for Eurosur and it is not deemed appropriate to use the wording the “interoperability and compatibility” for Eurosur in this regard.

Annex III

Paragraph 1 a) (line 411 en 412)

The NL supports this proposal.

Paragraph 1 c) (line 413)

The NL disagree with this proposal. From our perspective this is a further limitation of spending the amount (of funding) in relation to its purpose. The implementation of the recommendations following from the de Vulnerability assessment is already integrated in other parts of the treaty.

The NL does not wish further limitation in this respect. Already it is acknowledged that a MS needs to take into account operational needs.

Annex IV

Paragraph 5 (line 453, 454 en 456)

The NL supports this proposal.



POLAND

We currently have no comments on the proposed changes, however we would like to ask about the reason for changes to the already agreed parts of the regulations (compromise text). Poland indicates the possibility of raising additional reservations in the future.

PORTUGAL

Paragraph 2 (line 113)

PT does not oppose the drafting suggestion.

Article 4 – Scope of support

Paragraph 2a (line 120)

PT does not oppose the drafting suggestion.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

Portugal suggests consulting the Associated States to comment on this new wording.

Article 12 – Programmes

Paragraph 12 (line 207)

PT does not support the drafting suggestion.

Annex III

Paragraph 1 a) (line 411)

PT does not oppose the drafting suggestion.

Paragraph 1 c) (line 413)

PT does not oppose the drafting suggestion.

Annex IV

Paragraph 5 (line 453)

PT does not oppose the drafting suggestion.

ROMANIA

Article 3 Objectives

Paragraph 2 (line 113)

We can support the proposal.

Article 4 – Scope of support

Paragraph 2a (line 120)

This is a **red-line** and we cannot support it. The text goes against Council's approach to multipurpose usage and scope. Main arguments are presented in the EE non-paper which we support.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

We can support the proposal.

Article 12 – Programmes

Paragraph 12 (line 207)

We can support the proposal.

Annex III

Paragraph 1 a) (line 411)

The suggested text is a substantive change for RO and a **red-line**. With the change from (b) to (a) services and rehabilitation and refurbishment of buildings costs will become ineligible at those internal borders at which controls have not been lifted yet as this has to be read together with art 4 (3) (a).

Paragraph 1 c) (line 413)

We can support the proposal.

Annex IV

Paragraph 5 (line 453)

We can support the proposal.

SLOVAKIA

Article 3 Objectives

Paragraph 2 (line 113)

Slovakia can support the wording proposed by PRES.

Article 4 – Scope of support

Paragraph 2a (line 120)

Slovakia does not support the proposed wording. In order to allow more flexibility on the use of the ICT systems and multipurpose equipment and to avoid administrative burden, Slovakia proposes to keep the wording of the Art. 4 2a) - Equipment and ICT systems financed under this Instrument may be used for customs control, for maritime operations of multipurpose character and for achieving the objectives of the Internal Security Fund established by Regulation (EU) No ...[ISF] and of the Asylum, Migration and Integration Fund established by Regulation (EU) No ...[AMIF], as long as the primary purpose of those equipment and ICT systems is in accordance with this Regulation and doublefinancing is avoided.

Article 12 – Programmes

Paragraph 12 (line 207)

Slovakia can support the wording.

Annex III

Paragraph 1 (line 412)

Slovakia can support the proposed wording

Paragraph 1 c) (line 413)

Slovakia can support the proposed wording

Annex IV

Paragraph 5 (line 453)

Slovakia can support the proposed wording

SPAIN

Paragraph 2 (line 113)

Spain accepts this paragraph proposal.

Article 4 – Scope of support

Paragraph 2a (line 120)

Spain accepts this new paragraph.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

The Kingdom of Spain could support Presidency's proposal.

Article 12 – Programmes

Paragraph 12 (line 207)

Spain prefers maintaining Council agreed text of this paragraph. It is of the utmost importance to foresee the possibility that -in certain cases- when large-scale operating equipment and communication systems do not match with EBCG standards, MS can agree with the Agency an exception in given circumstances.

Annex III

Paragraph 1 a) (line 411), Paragraph 1 c) (line 413)

Spain supports these proposals.

In relation with line 411, as already clarified by the Commission, the aim of this paragraph is referred to a wide-range of infrastructures and buildings.

Annex IV

Paragraph 5 (line 453)

Spain supports this proposal.

SWEDEN

Sweden can accept the suggestions.



SWITZERLAND

Article 3 Objectives

Paragraph 2 (line 113)

We support this proposal. Pursuing the harmonisation approach in the common visa policy creates an added value.

Article 7 – Association agreements (Budget)

Paragraph 4 (line 155)

We would like to thank the Presidency for its drafting suggestion regarding article 7 paragraph 4 of the BMVI proposal. As you know, this paragraph is of paramount importance for the associated countries. We fully support the new proposed wording, as it is more precise and clear on the different steps. The purpose of this paragraph is to ensure that negotiations can start at the earliest possible point after the EU received the first notification of the concerned associated country. This will ensure that the supplementary arrangement can enter into force as soon as possible after the adoption of the BMVI regulation. The new proposed wording continues to serve this purpose.

Article 12 - Programmes

Paragraph 15

Table 1 of Annex VI contains a number of types of intervention per strategic objective. A breakdown of the planned costs by type of intervention in the national programme will limit the flexibility in the ongoing planning of the use of funds. Moreover, adjustments to this breakdown could lead to additional administrative burdens, should changes of this type be subject to approval by the Commission. The transfer of funds from one area of intervention to another should be made as unbureaucratic as possible.

Annex III

Paragraph 1 a) (line 411)

In general, we support the proposal. To us it is not quite clear whether the proposal is meant to be "...buildings including their rehabilitation and *refurnishment* or maybe *refurbishment*?"