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Interim Evaluation of the Internal Security Fund - Borders and Visa 2014-2017

Accompanying the document

Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions

on interim evaluation of the Asylum, Migration and Integration Fund and the Internal Security Fund

{COM(2018) 464 final} - {SWD(2018) 339 final} - {SWD(2018) 341 final}

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ABBREVIATIONS

AMIF	Asylum Migration and Integration Fund
BCPs	Border crossing points
CIPS	Specific programme Prevention, Preparedness and Consequence Management of Terrorism and Other Security-related Risks
DG CONNECT	DG Communications Networks, Content & Technology
DG HOME	Directorate-General for Migration and Home Affairs
DG MOVE	DG Mobility and Transport
DG NEAR	DG Neighbourhood and Enlargement Negotiations
DG TAXUD	DG Taxation and Customs Union
EBCGA	European Border and Coast Guard Agency (**Frontex**)
EBF	External Borders Fund
EES	Entry/Exit System
EIF	European Fund for the Integration of Third-Country Nationals
EMAS	Emergency assistance
ERF	European Refugee Fund
EU	European Union
eu-LISA	European Agency for the operational management of Large-Scale IT Systems in the area of freedom, security and justice
Eurostat	Statistical office of the European Union
FTD	Facilitated Transit Document
FTE	Full-time Equivalent
FRTD	Facilitated Rail Transit Document
IBM	Integrated border management
ISEC	Specific programme prevention of and fight against organised crime
ISF	Internal Security Fund
ISF-BV	ISF Borders and Visa
ISF-P	ISF Police
ISS	Internal security strategy
MFF	Multiannual financial framework
IOM	International Organisation for Migration
Member States	Member State(s) participating in ISF-BV incl. SAC
PNR	Passenger name record
RF	European Return Fund
RTP	Registered traveller programme
SAC	Schengen associated countries
SOLID	General programme solidarity and management of migration flows
SFC2014	Shared Fund Management Common System of the Commission
SSL	Security and safeguarding liberties programme

List of countries

AT	Austria	EE	Estonia	IT	Italy	PL	Poland
BE	Belgium	EL	Greece	LI	Liechtenstein	PT	Portugal
BG	Bulgaria	ES	Spain	LT	Lithuania	RO	Romania
CH	Switzerland	FI	Finland	LU	Luxembourg	SE	Sweden
CY	Cyprus	FR	France	LV	Latvia	SI	Slovenia
CZ	Czech Republic	HR	Croatia	MT	Malta	SK	Slovakia
DE	Germany	HU	Hungary	NL	Netherlands	UK	United Kingdom
DK	Denmark	IS	Iceland	NO	Norway		

EXECUTIVE SUMMARY

This Commission staff working document (SWD) examines the impact of the Internal Security Fund — Borders and Visa (ISF-BV) covering the period between 1 January 2014 and 30 June 2017[1] against eight evaluation criteria: (i) effectiveness, (ii) efficiency, (iii) simplification and reduction of administrative burden, (iv) relevance, (v) coherence, (vi) complementarity, (vii) EU added value and (viii) sustainability. For the programming period 2014-2020, EUR 2.609 billion was allocated for the management of the EU's external borders and visa policy. The Fund aimed to establish financial solidarity between Member States by supporting those countries that would experience a heavy burden in implementing the common standards for control of the EU's external borders.

The assessment focuses on the performance of the ISF-BV's financial support for the management of the EU's external borders, including at the level of the various individual policy themes which are major constituents of the concerned EU policy such as organising controls and managing the flows of people at the EU's external borders.

During the implementation period under review, migration conditions changed to another paradigm as Europe experienced a sudden and unexpected increase in migratory pressure on its southern and south-eastern external borders. Therefore, as the migration and security conditions underpinning the design of the funding instrument in 2011 changed drastically, new needs and funding priorities arose in order to further protect the EU's external borders, an area where the absence of internal border controls was significant.

The evaluation concludes that ISF-BV support is essential for carrying out the investments required to improve the EU's external border management systems. The ISF-BV is contributing crucially to the application of the Schengen *acquis*[2] considering the increase of migration flows since 2011, especially in 2014 and 2015. The Fund is tackling fragmentation by supporting the development and improvement at the national level of large IT systems, such as the Visa Information System and the second generation Schengen Information System (SIS II), as well as contributing to their coherent and effective use throughout all Member States. The ISF-BV is also encouraging a better use of resources by increasing the capacity of Member States to undertake border surveillance and by developing consular cooperation between Member States.

The evaluation gave evidence that, in the challenging migration and security context described above, the funding instrument is, overall, flexible enough to respond to the changing needs resulting from the migration crisis by shifting resources to the affected Member States, also through emergency assistance (EMAS).

Lastly, the evaluation has found that the ISF-BV is prompting or contributing to the set-up of comprehensive management and control systems, through (i) good coordination with the European Commission, (ii) applying stringent procurement procedures, and (iii) *ex post* audits of projects and monitoring arrangements. Therefore, the ISF-BV is promoting the reasonable use of EU financing in the field of border management.

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1 Commission delegated Reg. (EU) 2017/207 of Oct. 3rd 2016 on the Common Monitoring and Evaluation Framework (CMEF) provided for in Reg. (EU) No 514/2014 of the European Parliament and of the Council laying down general provisions on the AMIF and on the ISF.

2 The Schengen acquis is derived from the 1990 Schengen Convention to implement the 1985 Schengen agreement, which abolished checks at the internal borders of a number of EU Member States by 1995, creating the 'Schengen Area'.

Based on the interim evaluation, the following conclusions have been drawn.

- ISF-BV's effectiveness has been impacted by the migration and security crisis, which put enormous pressure on the EU's external borders and caused some Member States to reintroduce temporary internal border control measures. Regarding the common visa policy, the Fund has helped to implement it through better consular coverage, harmonisation of procedures, facilitating legitimate travel, organising information exchanges and training courses and supporting the development of common IT systems. The Fund has also contributed to the development of integrated border management policy, which increased solidarity among Member States by co-financing equipment used in Frontex joint operations. It has also contributed to the development of the EU's *acquis* on border management, the European Border Surveillance system (EUROSUR), and border management IT systems. However, consular cooperation and cooperation with third countries attracted less attention from Member States than expected.

- The results of ISF-BV so far have been achieved at a reasonable cost in terms of both human and financial resources, but the administrative burden appears to be the main factor undermining efficiency. Even if national programmes have been very slow to begin, the Fund's overall implementation appears to be on track, as EMAS bridged the funding gap and catered to immediate needs. This was facilitated by the flexible approach applied to EMAS management.

- The management and control measures have been considered to be appropriate and efficient, with stringent mechanisms to ensure fraud and irregularities are prevented.

- There is little evidence, at this stage, that the administrative burden has been significantly reduced, though ISF-BV has led to simplification relative to the past. Several new administrative and managerial procedures were introduced, taking into account the lessons learnt from the previous funds, including the adoption of the Better Regulation guidelines and toolbox and the collection of indicators in order to ensure a more appropraiate measure of performance.

- ISF-BV is relevant and its original rationale and objectives remain largely valid even though the migration crisis has brought much more focus on how the EU's external borders are managed. Member States are calling for more flexibility measures.

- The Fund has been found to be coherent with and complementary to other national and EU interventions.

- The Fund's EU added value has been illustrated both from a policy and financial perspective.

- Many ISF-BV actions are long-term actions by their nature, since they are generally designed to remain operational beyond the Fund's support, while the sustainability of other actions relies on other sources of national or EU funding. Training activities and other cooperation mechanisms have also contributed to the increased sustainability of actions.

1. INTRODUCTION

This Commission SWD presents the interim evaluation of the Internal Security Fund — Borders and Visa (ISF-BV) in line with Article 57 of Regulation (EU) No 514/2014 of the European Parliament and of the Council, the Commission Delegated Regulation (EU) 2017/207 and the Better Regulation Guidelines[3].

Member States submitted to the Commission interim evaluation reports on the implementation of actions and progress towards achieving the objectives of their national programmes by 31 December 2017. On the basis of these reports, the Commission must submit an interim evaluation report on the implementation of Regulation (EU) No 513/2014, Regulation (EU) No 514/2014 and Regulation (EU) No 515/2014 to the European Parliament, to the Council, to the European Economic and Social Committee and to the Committee of the Regions by 30 June 2018.

The purpose of the interim evaluation of the ISF-BV is to:

1) ensure transparency and accountability in the ISF's implementation, the general objective of which is to ensure a high level of security within 'an area of freedom, security and justice'; and

2) help make the future implementation of EU instruments in the fields covered by ISF more relevant, effective, efficient, and sustainable and enable them to provide EU added value and simplification measures as well as reduce administrative burden.

This evaluation looks at the progress made in implementing the programme, and assessed whether corrective actions are needed to make sure that the programme delivers as planned. It also contributed to the preparation of the next generation of funding instruments (the successors of ISF-BV), under the post-2020 multiannual financial framework (MFF).

This evaluation covers all EU Member States, except Ireland and the United Kingdom that do not participate in ISF-BV. In addition, the evaluation covers Switzerland, Iceland, Liechtenstein and Norway, who are associated with the programme due to the fact that they fully implement the Schengen *acquis*[4]. The evaluation covers the period from 1 January 2014 until 30 June 2017 and covers the national programmes of the participating countries, including specific actions and technical assistance as well as Union actions and emergency assistance.

[3] https://ec.europa.eu/info/files/better-regulation-guidelines_en

[4] Throughout this document the term Member States (Member States) refers to the following group of countries: EU Members States without the UK and Ireland and also including Switzerland, Iceland, Liechtenstein and Norway.

2. BACKGROUND TO THE INTERVENTION

2.1 Baseline

Policy context

One of the EU's overarching objectives is to offer its citizens 'an area of freedom, security and justice with respect for fundamental rights and the different legal systems and traditions of the Member States' (Art. 67 TFEU). It has been on top of the EU policy agenda since the Tampere Council Conclusions in 1999[5]. To achieve this goal, the Member States have to make a common effort to invest in the protection and security of their common external borders.

The Schengen area is one of the EU's greatest achievements. It is an area without internal borders where the people are ensured of the right to free movement without being subjected to border checks. Schengen states have improved and tightened controls at their common external borders on the basis of common rules to ensure the security of those living or travelling in the Schengen area and to prevent illegal entry, while facilitating legitimate travel. The Schengen *acquis* provides for common rules and procedures to be applied by signatory states with regard to short-term visas and border controls. Therefore, all signatory states needed to contribute to ensuring a high and uniform level of control on individuals and surveillance of the EU external borders.

The consolidation and functioning of the Schengen area requires an overall border policy architecture at the EU level supporting the components of the common integrated border management (IBM) strategy. The IBM concept encompasses three dimensions[6]:

- a common corpus of legislation, in particular the Schengen Borders Code as well as the Regulation on local border traffic;
- operational cooperation between Member States, including cooperation as coordinated by Frontex;
- solidarity between Member States and the EU through the establishment of an External Borders Fund.

However, the burden borne to implement the common standards for control of the EU's external borders varied significantly from Member States to Member States. These variations were explained through the differences between Member States in terms of (i) the geography of their external borders, (ii) the number of border crossing points (BCPs), (iii) the level of migratory pressure, (iv) the risks and threats encountered and (v) the number of Schengen visa applications received.

The Council identified the External Borders Fund (**EBF**), the first funding instrument that deals with borders, as one of the three dimensions of IBM. The EBF's general objectives were to increase the efficiency of control and management of flows of people at the external borders, as well as unify the implementation of the EU legislation on the crossing of external borders and improve the management of activities organised by consular services. The EBF was implemented under shared management arrangements, by means of annual national programmes. It also funded Community and specific actions, which were managed at the initiative of the European Commission (direct management) and implemented by the Member States.

5 Tampere European Council 15 and 16 October 1999 Presidency Conclusions.

6 Council Conclusions, Justice and Home Affairs, 2768th Council Meeting, Brussels, 4-5 December 2006.

The EBF was one of the four[7] EU funding instruments established in 2007 as part of the framework programme on Solidarity and Management of Migration Flows[8] (SOLID). It was also part of a wider policy package which also included the Frontex Agency[9], the Schengen Borders Code[10] and the Schengen Evaluation Mechanism[11]. The EBF, backed by funding of EUR 1.82 billion, intended to fully support the following five priorities[12]:

a) creating a common integrated border management system to carry out checks on people and for the surveillance of the external borders;
b) further developing and implementing the national components of a European Surveillance System for the EU's external borders and a permanent European Patrol Network for the southern maritime borders;
c) issuing visas and tackling illegal immigration;
d) establishing the IT systems required to implement EU border and visa legislation; and
e) promoting the effective and efficient application of EU border and visa legislation[13].

The work towards achieving the IBM is a long-term and complex process, which benefitted from the support of the EBF. However, not all components were covered by the Fund. For instance, the consolidation and the functioning of the Schengen Area requires the Member States to acquire and develop the skills and obtain the equipment and technology necessary to be operational within IBM at EU level. Also, while being implemented, the EBF had to face the following challenges indicated in the table below.

Table 1: Overview of expected challenges for the Member States and the EU in the period 2014-2020[14]

Policy challenges in the area of border management and visa	▪ The length of the external border and the number and nature of border crossing points vary widely between Member States. The responsibilities for border control differ considerably from Member States to Member States, resulting in some of them bearing a disproportionate share of the associated costs. Therefore, Member States at the EU's periphery with long borders and with many border crossing points have bigger responsibilities than other Member States to prevent irregular migration, facilitate bona fide cross-border movements and provide security. ▪ Member States do not only issue visas in their own interest, but they have a common interest in applying common standards as people holding a visa or residence permit from an Member States can move freely to other countries. ▪ To promote solidarity, the EBF aimed towards achieving a fair share of the responsibilities between Member States taking into account the financial burden arising from the introduction of integrated management of the EU's external borders.

7 The other three funds are the European Refugee Fund (ERF), the European Fund for the Integration of Third-Country Nationals (EIF), and the European Return Fund (RF).

8 COM (2005) 123 final, Communication establishing a framework programme on Solidarity and the Management of Migration Flows for the period 2007-2013, European Commission, 6 April 2005.

9 Council Regulation (EC) No 2007/2004 of 26 October 2004 establishing a European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union, OJ L 349, 25.11.2004, p. 1. Frontex has now been replaced by the European Border and Coast Guard Agency as per Regulation (EU) 2016/1624 of 14 September 2016 on the European Border and Coast Guard (OJ L 251, 16.9.2016, p. 1).

10 Regulation (EU) No 562/2006 establishing a Community Code on the rules governing the movement of persons across borders (Schengen Borders Code), 15 March 2006.

11 Council Regulation (EU) No 1053/2013 establishing an evaluation and monitoring mechanism to verify the application of the Schengen *acquis* and repealing the Decision of the Executive Committee of 16 September 1998 setting up a Standing Committee on the evaluation and implementation of Schengen, 7 October 2013.

12 Commission Decision 2007/599 /EC of 27 of August 2007 Implementing Decision No 574/2007/EC of the European Parliament and of the Council as regards the adoption of strategic guidelines for 2007 to 2013.

13 The EU External Borders Fund (EBF): European Court of Auditors' Special Report No 15/2014. December 2014.

14 Impact assessment accompanying the proposal for the home affairs funds in 2014-2020 (SEC(2011)1358 of 15.11.2011).

In addition, the future ISF-BV fund was also to address and tackle certain needs and priorities that the EBF was not able to deal with, such as:

a) further developing an integrated border management system;
b) strengthening the operational capabilities of the Member States within EUROSUR;
c) maintaining the large-scale IT systems (i.e. Schengen Information System II[15], Visa Information System[16] or the functioning of an IT agency);
d) developing new IT systems, such as the Entry-Exit System (EES) or the registered traveller programme (RTP);
e) control measures within the area of free movement; and
f) support inter-agency cooperation[17].

In a parallel development, the **internal security strategy (2010-2014)** (ISS) enabled the EU to improve the preparedness and respond to existing and emerging threats to the overall European society. Significant progress was made under the fourth strategic objective of the ISS; strengthening security through border management. In relation to this objective, four key actions were identified: 1) exploit the full potential of EUROSUR; 2) boost Frontex's contribution at the external borders; 3) undertake common risk management for moving goods across external borders, and 4) improve inter-agency cooperation at national level[18].

The results under the actions above were:

a) the entry into force at the end of 2013 of EUROSUR;
b) a new Schengen governance legislation[19];
c) introduction of the Schengen Information System II;
d) Visa Information System; and
e) legislative proposals for an EES and an RTP (which would later become the Passenger name record (PNR)).

Also, the ISS identified future challenges for the EU, both at an internal and external level, related to social crises, people's mobility, demographic changes and/or political instability. Therefore, the ISS outlined the following challenges that future strategies and funds should tackle in the coming years:

a) address the further increase in the amount of people coming to the EU;
b) ensure all Member States sufficiently control their corresponding section of the external borders;
c) ensure solidarity mechanisms are put in place to support Member States under pressure;
d) support the adoption of the EES and RTP;
e) ensure the Schengen Information System II operates effectively;
f) explore the feasibility of establishing a European System of Border Guards and;
g) devise a strategy and action plan for the security of the supply chain and risk management, and contribute to its implementation.

15 The Schengen Information System (SIS) is a highly efficient large-scale information system that supports external border control and law enforcement cooperation in the Schengen States.
16 The Visa Information System allows Schengen States to exchange visa data. It consists of a central IT system and a communication infrastructure that links this central system to national systems.
17 Impact assessment accompanying the proposal for the home affairs funds in 2014-2020 (SEC(2011)1358 of 15.11.2011).
18 Final implementation report on the ISS (COM(2014) 365).
19 Regulation (EU) No 1053/2013; Regulation (EU) No 1051/2013.

In addition, Member States identified the following key risks and problems[20] at the EU external borders in 2014: (i) large numbers of illegal border crossings at the external land and sea border; (ii) document frauds to circumvent border control measures; and (iii) cross-border crimes and travellers who intend to commit crime or terrorism within the EU.

The 2015 European Agenda on Security[21] was launched almost in parallel with the beginning of ISF-BV's implementation. Since then, the Agenda has been providing strategic direction for the Fund in areas where financial support would bring more added value, such as:

a) further development, improvement and optimisation of the Schengen Information System;
b) the interlinking of the Schengen Information System with Interpol's database on stolen and lost travel documents (SLTD);
c) common risk indicators to support the work of national border authorities when conducting checks on people;
d) unifying standards of border management; and
e) complementary measures to improve security in relation to the movement of goods.

Funding context

The share of funding for home affairs in the EU budget was relatively small but it has steadily grown (over the period 2007-2013 it amounted to EUR 6.45 billion or 0.77 % of the total EU budget. It covered the financing programmes, and it provided funding for large-scale IT systems (Visa Information System, Schengen Information System, Eurodac) and the agencies). The spending during this period was characterised by heavy 'back-loading', increasing from EUR 500 million in 2007 to EUR 1.5 billion in 2013. Such funding and the corresponding increase enabled the EU to tackle several policy challenges during 2007-2013, as described above.

The table below represents a comparative overview between the EBF and ISF-BV in relation to the budget, participation and objectives.

Table 2: Overview of the Funds related to borders and visa in the periods 2007-2013 and 2014-2020 [22]

General programme	Policy area	Fund / Specific programme Budget, participation & objectives	
		Previous funds	Current funds
General programme Solidarity and Management of Migration Flows *(93 % to 96 % shared*	Asylum	European Refugee Fund (ERF III) EUR 614 million[23], all Member States except DK ▪ Support and encourage Member States in receiving refugees and displaced persons ▪ Emergency measures to address sudden mass influx if migrants and asylum seekers	Asylum Migration and Integration Fund (AMIF, 2014-2020) EUR 3.137 million (initial), all Member States except DK ▪ Strengthen and develop all aspects of the CEAS ▪ Support legal migration to

[20] Those risks were defined in 2014 by the Frontex Risk Analysis Unit after an Annual Analytical Review with Member State analysts participating in the Frontex Risk Analysis Network.
[21] Communication from the Commission COM(2015) 185 final. Strasbourg, 28.4.2015.
[22] A full comparative table including all previous and current home affairs funds can be found in Annex 5.
[23] After adoption of EASO; takes account of Decision No 458/2010/EU amending the ERF basic act.

management; remainder under centralised direct management)	Integration of legally residing TCNs, legal migration	European Fund for the Integration of Third-Country Nationals (EIF) EUR 825 million, all Member States except DK ▪ Support the integration of non-EU immigrants into European societies	the Member States and promote effective integration of third-country nationals ▪ Strengthen fair and effective return strategies and contribute to combating illegal immigration ▪ Strengthen solidarity and responsibility sharing between Member States, particularly those most affected by the migratory flows
	Return	European Return Fund (RF) EUR 676 million, all Member States except DK ▪ Improve return management ▪ Encourage development cooperation between Member States and countries of return	
	Integrated border management and visa	External Borders Fund, (EBF) EUR 1.820 million, all Member States (including RO & BG and the Schengen associated states from 2010) except the UK and IE ▪ Financial solidarity among Schengen countries ▪ Manage efficient controls and the flows at the external borders ▪ Improve management of the consular authorities	Internal security Fund (ISF, 2014-2020) EUR 3.764 million (initial) ISF-Borders and Visa All Member States except IE and UK plus the Schengen associated states CH, IS, LI, NO ▪ Ensuring a high level of security in the EU and facilitate legitimate travel ▪ Visa and support integrated border management
General programme Security and Safeguarding Liberties *(centralised direct management)*	Prevention of and fight against organised crime	Specific programme Prevention of and Fight against Organised Crime (ISEC) EUR 600 million, all Member States ▪ Crime prevention, law enforcement, witness protection and support, victims protection	
	Combating terrorism and other security-related risks	Specific programme Prevention, Preparedness and Consequence Management of Terrorism and Other Security-related Risks (CIPS) EUR 140 million, all Member States ▪ Protection of citizens and critical infrastructure from terrorist attacks and other security incidents	ISF-Police All Member States except DK and UK ▪ Ensure a high level of security in the EU, fight against crime, manage risks and crisis

The four different SOLID funds complemented each other and provided a holistic approach to home affairs funding. However, there were weaknesses, identified by the *ex post* evaluations, and the European Court of Auditors special reports[24], as well as during the Commission's impact assessment that accompanied its proposals for the 2014-2020 generation of home affairs funds[25]. Those weaknesses included: (i) a lack of effective monitoring and evaluation systems; (ii) a lack of common indicators with measurable targets; (iii) high administrative burdens; and (iv) delays in providing evaluation reports at both at Member States and Commission level.

To counter these weaknesses, recommendations were proposed which included, among others:

[24] ECA (2012) Special report No. 22, Do the European Integration Fund and the European Refugee Fund contribute effectively to the integration of third-country nationals? & ECA (2014) Special report No.15, The External Borders Fund has fostered financial solidarity but requires better measurement of results and needs to provide further EU added value.

[25] SEC(2011) 1358 final of 15.11.2011.

- the adoption of a broader framework to:
    - allow the funds to adapt to the Member States objectives and changing needs;
    - to focus on pressing issues and where needs are the largest;
- a harmonised approach across all EU funding streams;
- the improvement of monitoring and evaluation tools and capacities at EU, Member States and project levels;
- the improvement of sustainability by awarding funding based on innovation and sustainability of proposals.

The EBF *ex post* evaluation's final report and the EBF SWD also identified several issues, lessons and recommendations to be considered, which are detailed in the table below.

Table 3: Lessons learnt from the EBF and how ISF-BV approached them

Lessons learnt from the EBF *ex post* evaluation …	Under ISF-BV …
The EBF had a **complex architecture**, as it consisted of four broad objectives, numerous specific objectives and five priorities. The aim was to keep the Fund concrete and operational but this was not achieved.	➔ The **architecture was simplified as ISF-Borders and Visa** includes only two specific objectives (one for Borders and one for Visa) supported by seven operational objectives.
There were **difficulties linked to evaluation limitations** when assessing the EBF's overall effectiveness at EU level. The lack of an initial baseline and the fact that the EBF's monitoring and evaluation system did not allow for detailed monitoring and assessment of the Fund's performance. Set indicators were rather weak and monitoring data were not fully reliable.	➔ A list of **common indicators has been included in the Fund's legal base**. Moreover, Delegated Regulation (EU) 2017/207 was adopted in October 2016 on the common monitoring and evaluation framework for ISF-Borders and Visa. The following was adopted to improve the monitoring of the Fund: a) **a set of evaluation questions** and indicators were included in the framework mentioned above; b) a **guidance document** on the monitoring and evaluation framework for Member States was created; c) **a common template** for Member States to submit the evaluation reports and; d) an **Evaluation Network** was created for Member States staff and the Commission to discuss and resolve evaluation-related matters.
The EBF was implemented through a strategic multiannual programme covering the whole programming period. However, **annual programmes** were **adopted yearly**, which was considered by some Member States a **heavy administrative burden**.	➔ A **single multiannual national programme** which covers the period 2014-2020 was introduced. This speeds up the funding process and decreases administrative burden by allowing Member States to apply national eligibility rules with some added flexibility.
Eligibility limitations were detected that prevented some actions from being implemented.	➔ There is **operating support** by which Member States can cover staff costs at border crossing points.
The specific actions **did not have a clear targeted focus**. This was also administratively complicated to implement and resulted in an overlap with EMAS and projects implemented under the annual programme.	➔ It was decided to **abolish the specific action under direct management** in the ISF-BV and to **include such actions in shared management** to allow Member States to have more ownership and flexibility.

Member States showed **little interest in developing projects related to consular cooperation**.	➔	There is a **90 % co-financing rate** in NATIONAL PROGRAMMEs.
Countries receiving small volumes of funds had **higher management costs**.	➔	A threshold has been set to ensure that each Member States is allocated a **more appropriate amount of funding, relative to its needs,** as a starting block and the allocation percentage for **technical assistance** has been slightly increased.

Thus, ISF-BV is building on the lessons learnt from its predecessor, the EBF, in providing support to Member States for managing the EU's external borders and the EU's visa policy. For instance, ISF-BV has a larger scope than the EBF, which was more limited to border control and visa policy. Through ISF-BV the EU can, for example, support verification measures within the area of free movement which were not carried nearby the external borders. It can also support inter-agency cooperation and the building of connections across the different law enforcement authorities, including those working within the territory of a Member State (police, border guards, customs, etc.) under an internal security agenda. ISF-BV can also support operational activities in the Member States related to borders and visa such as staff costs, etc.

This SWD, notwithstanding its main purpose of ensuring transparency and accountability, and contributing to the Fund's relevance, effectiveness and efficiency, is also looking to analyse the extent to which the recommendations that came out of the *ex post* evaluations of SOLID have been taken into account in ISF-BV.

2.2 Description of ISF-BV and its objectives

In a nutshell

ISF-BV aims at ensuring a high level of security in the Union while facilitating legitimate travel, through a uniform and high level of control of the external borders and the effective processing of Schengen visas, in compliance with the Union's commitment to fundamental freedoms and human rights, and is expression of and implemented by the principle of solidarity and fair sharing of responsibility within the EU.

The legal base of ISF-BV is Regulation (EU) No 515/2014 adopted by the European Parliament and the Council on 16 April 2014, and it is based on Article 77(2) of the TFEU.

General and specific objectives of the ISF-BV

The objectives for the ISF-BV are set out in Article 3 of the Regulation - the general objective of the Fund ' …*shall be to contribute to ensuring a high level of security in the Union while facilitating legitimate travel, through a uniform and high level of control of the external borders and the effective processing of Schengen visas, in compliance with the Union's commitment to fundamental freedoms and human rights*'. This general objective is further broken down in two specific objectives on visa policy and border management:

Specific objective 1: supporting a common visa policy

Applying common visa standards has become essential as people holding a visa or residence permit in the Schengen area can move freely from one Member States to another. Therefore, all Member States share a common interest in ensuring that the EU's visa policy is efficiently and securely applied. Therefore, the ISF-BV supports, through this specific objective, capacity building in the Member States in order to sufficiently implement the common visa policy.

Specific objective 2: supporting integrated border management

An efficient border control is crucial to ensuring the free movement of legally residing third-country nationals and EU citizens as well as ensuring internal security. As peripheral Member States control a significant length of the EU's external borders, their responsibilities for border control have become overwhelming. In this regard, ISF-BV supports, through this specifc objective, (i) the further harmonisation of the border management, (ii) the sharing of information between the Member States, and (iii) the sharing of information between the Member States and the Frontex Agency.

To fulfil the specific objectives a number of operational objectives were defined[26].

Table 4: ISF-BV operational objectives

Operational objectives	(a) **To promote the development, implementation and enforcement of policies** to ensure that people, regardless of their nationality, are not subject to checks when crossing the EU's internal borders, and to ensure efficient monitoring and checks are carried out on people crossing the EU's external borders. (b) To gradually establish an integrated management system for external borders, based on solidarity and responsibility, particularly through: i. **strengthening external border** checks and surveillance systems, and inter-agency cooperation between border guards, customs, migration, asylum and law enforcement authorities of Member States at the external borders, including in the maritime border areas; ii. **measures within the Member States territories on the management of external borders** and the necessary supporting measures on document security, identity management and the interoperability of acquired technical equipment; iii. any measures that also help **prevent and combat cross-border crime at external borders** concerning the movement of people, including trafficking in human beings and human smuggling. (c) **To promote the development and implementation of the common policy on visas** and other short-stay residence permits, and different forms of consular cooperation to ensure better consular coverage and harmonised practices on visa issuing. (d) **To set up and run IT systems**, their communication infrastructure, and equip-ment **that support the common visa policy**, border checks and border surveillance at the external borders. These IT systems should fully comply with personal data protection law. (e) **To boost situational awareness at the external borders** and the reaction capabilities of Member States; (f) **To ensure the EU's *acquis*** on borders and visas **is efficiently and uniformly applied**, including the effective functioning of the Schengen evaluation and monitoring mechanism; (g) **To boost actions by the Member States that are helping to strengthen cooperation between Member States** operating in third countries concerning the

[26] Also, as set out in Article 3 of Regulation (EU) No 515/2014.

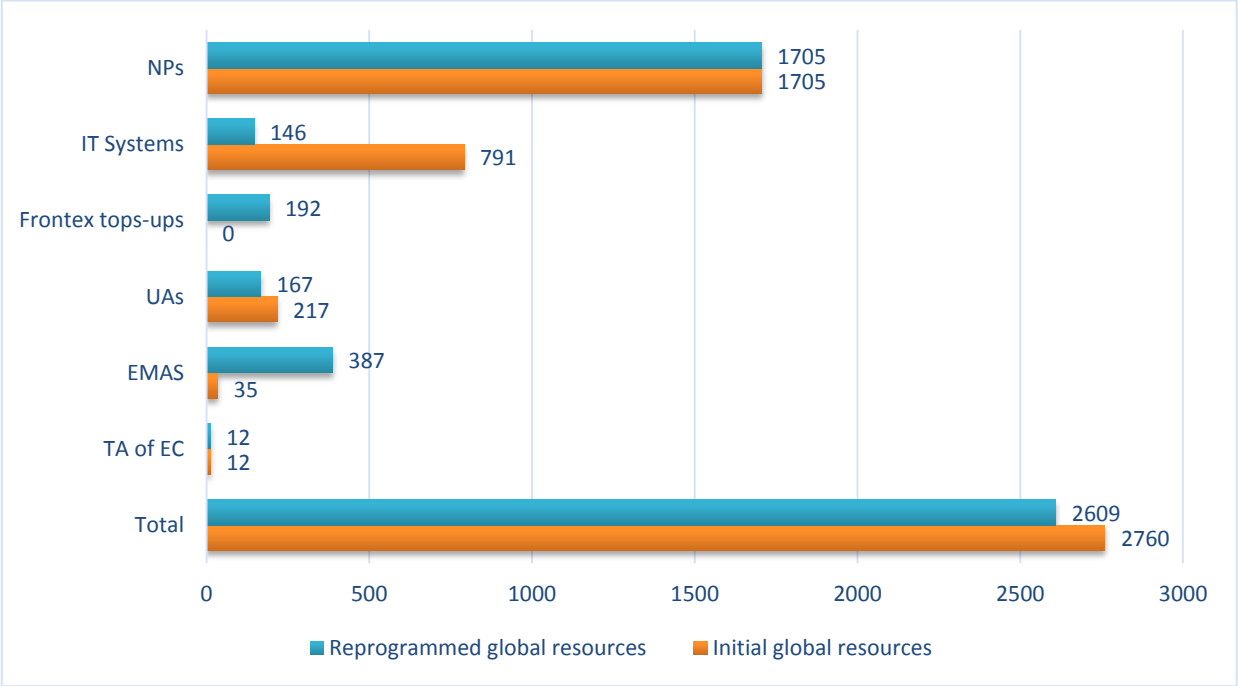
	flows of third-country nationals into the Member States' territory. These actions include preventing and tackling of illegal immigration, as well as cooperating with third countries in full compliance with the objectives and principles of the EU's external action and humanitarian policy

2.2.1. Global resources

According to the legal base, the initial global resources for implementing ISF-BV in the period 2014-2020 were set at EUR 2.76 billion, whereas the reprogrammed amount stands at EUR 2.61 billion, as shown in the below figure. Further details in relation to the Fund's implementation and its management modes are explained in Section 3 of this SWD.

The funds allocated to NATIONAL PROGRAMMEs (65 % of the total reprogrammed resources, including the Special Transit Scheme (STS)[27] for Lithuania, and to technical assistance at the initiative of the Commission (0.46 % of the total) have remained unchanged. In response to unforeseen needs caused by the migration crisis, significant differences were made to funds allocated to EMAS (the amount increased from an initial allocation of 1.3 % to 14.8 % of the total fund). Furthermore, UAs have decreased by a quarter so more EMAS can be provided. The Member States received an additional amount of EUR 192 million to purchase equipment to be used in Frontex joint operations. As for the funds available for IT systems, the overall allocation of EUR 791 million has not changed - only the part to be implemented via ISF-BV has been reduced to EUR 145.7 million with the remaining amount to be implemented via the 'Smart Borders' and 'Schengen Information System II' budget lines managed by the Commission as well as directly by two EU agencies (eu-LISA and Frontex).

Figure 1: Initial and reprogrammed global resources for 2014-2020 (EUR million)



2.2.2. Eligible actions and beneficiaries

[27] Regulation (EU) No 515/2014, Chapter II, Article 11.

All Member States (except IE and the UK) and as well as IS, LI, NO and CH participate in the Fund's implementation. The Fund's beneficiaries include federal and national authorities, local public bodies, non-governmental and humanitarian organisations, private and public law companies, education and research organisations.

The ISF-BV supports actions in or by Member States, with a special focus on the ones shown in the table below, but maintains a wide scope to ensure full coverage of needs.

Table 5: ISF-BV eligible actions

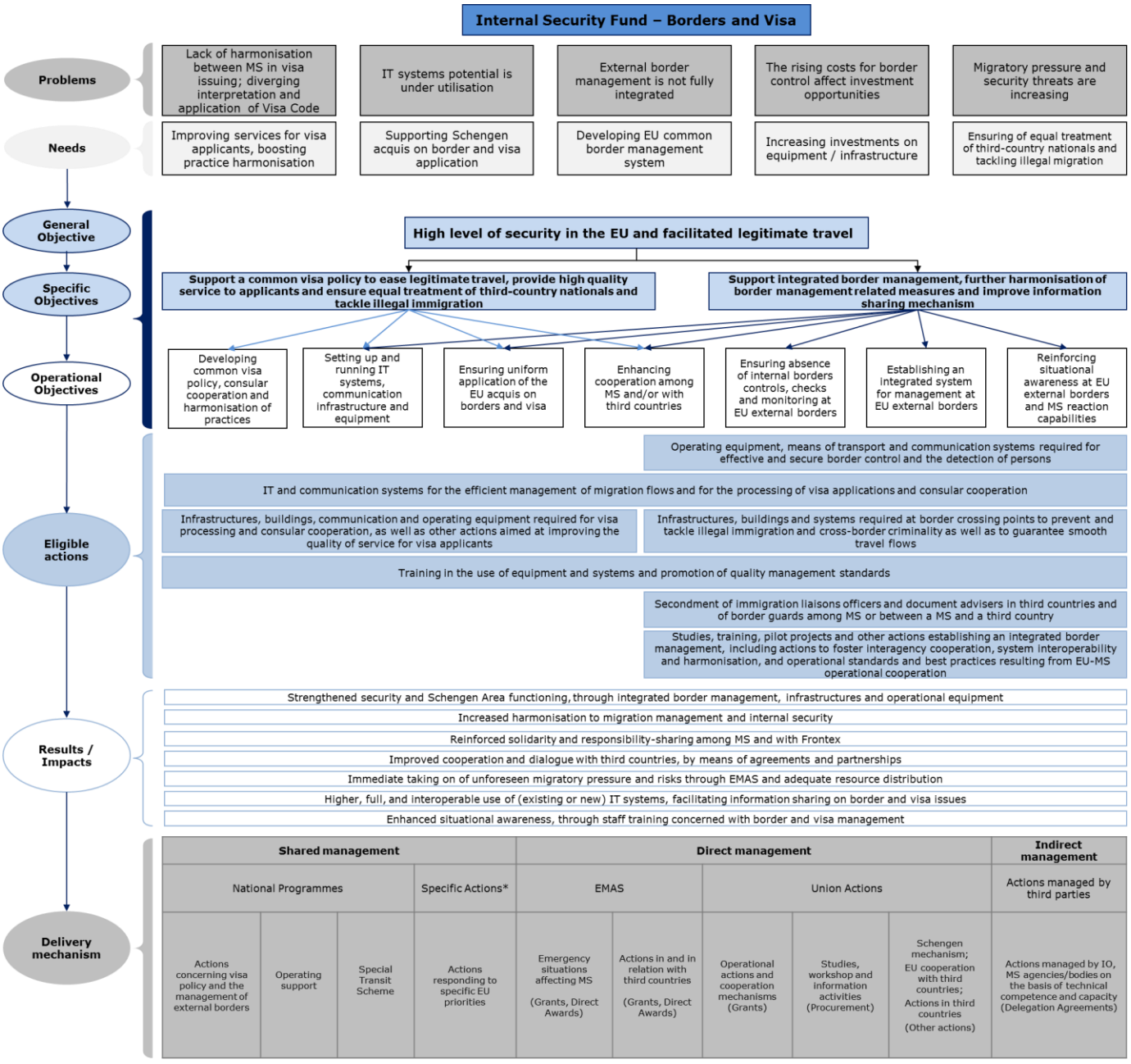
ISF-BV ELIGIBLE ACTIONS	a) infrastructure, buildings and systems required at border crossing points and for surveillance;
	b) operating equipment, means of transport and communication systems;
	c) IT and communication systems to manage migration flows efficiently;
	d) infrastructure, buildings, communication and IT systems and operating equipment;
	e) training in the use of the equipment and systems referred to in points (b), (c) and (d) and the promotion of quality management standards and training of border guards;
	f) secondment of immigration liaisons officers and document advisers to third countries;
	g) studies, training, pilot projects and other actions that gradually establish an integrated management system for external borders;
	h) studies, pilot projects and actions that aim to implement the recommendations, operational standards and best practices resulting from the operational cooperation between Member States and EU agencies.

The Fund can also support actions in relation to or in third countries, such as: IT systems, training, promoting the development and implementation of the common policy on visas or boosting situational awareness. It also contributes to the financing of technical assistance at the initiative of the Member States and the Commission.

2.2.3. The Intervention Logic

The intervention logic (see Figure 2) of the ISF-BV Fund is defined in order to understand what the Fund is aiming to achieve and how it will be achieved, by presenting the causal and logical links between problems, needs, objectives and eligible actions, as well as the connections between results and impacts. The implementation process is further explained in section 3.1.

Figure 2: Intervention logic for the interim evaluation of ISF-BV



3. IMPLEMENTATION / STATE OF PLAY

3.1 Description of the implementation process

ISF-BV is being implemented either by the Member States (shared management), directly by the Commission (direct management), or indirectly by entrusting the budget implementation task to a third party[28] (indirect management).

Under **shared management**, resources are allocated through national programmes to be implemented in close cooperation with competent authorities and institutions. Member States implement national programmes which contribute to the EU's policy objectives but which are also tailor-made according to their national context. This ensures a level-playing field among Member States, reduces the adverse effects of competition for funding, and brings predictability to funding allowing Member States to better plan their actions. Some actions, due to their nature, such as transnational actions, innovative projects, support to civil society, and actions requiring funds to be mobilised quickly are implemented under **direct management** by the Commission. Aside from actions to pursue the Fund's specific objectives, within national programmes, each Member States 'may use up to 40 % of the amount allocated to finance **Operating Support** to the public authorities responsible for accomplishing the tasks and services that constitute a public service for the Union'[29].

In addition to the basic amount allocated to national programmes, Member States may also receive additional resources for the implementation of **specific actions** (SAs). SAs respond to EU priorities, in particular: 'the setting up of consular cooperation mechanisms between at least two Member States' (SA1), and 'the purchasing of means of transport and operating equipment that are considered necessary for the deployment during the joint operation by the European Border and Coast Guard Agency (EBCGA, hereinafter referred to as Frontex) and that shall be put at the disposal of the Agency' (SA2)[30]. Shared management also includes the '**Special Transit Scheme**'[31]. This is a financial instrument that the EU granted to Lithuania to support the management of people transiting between the Kaliningrad region and the rest of the Russian Federation, through EU territory, by means of the Facilitated Transit Document (FTD) and the Facilitated Rail Transit Document (FRTD).

At the beginning of the programming period, all Member States had a policy dialogue with the Commission to enable them to prepare their national programmes. Based on the outcome of these dialogues, the Member States submitted their multiannual national programmes. The Commission examined these programmes, consulted Frontex and eventually approved each national programme. To implement their national programmes, Member States had to set up a management and control system[32]. The Commission follows the implementation under shared management by examining the annual implementation reports (AIRs) and accounts submitted by the Member States.

A mid-term review of national programmes was planned for the middle of the programming period, i.e. in 2018. In addition, in order to evaluate the programmes, Member States are expected to submit

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28 These parties can be countries or the bodies they have designated, international organisations and their agencies.

29 As outlined in Article 10 of Regulation (EU) No 515/201424 'Operating support shall be concentrated on specific tasks and/or services and shall be focused on the objectives as laid down in Annex III. It shall entail full reimbursement of the expenditure incurred to accomplish the tasks and/or services defined in the national programme, within the financial limits set by the programme and the ceiling laid down in paragraph 1.'

30 Regulation (EU) No. 515/2014, Annex II.

31 Original earmarked resources: EUR 154 million.

32 Horizontal Regulation (EU) 514/2014, Section 2.

two national evaluation reports: an interim evaluation report by the end of 2017 and an *ex post* evaluation report by the end of 2023. The Commission will take these reports into account in its interim and *ex post* evaluations of the Fund, which are to be sent to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions by 30 June 2018 and 20 June 2024 respectively.

A small amount of money equal to 5 % of the total national allocation plus EUR 0.5 million is reserved in the national programmes for technical assistance.

Moreover, each Member States needs to establish a partnership with relevant stakeholders including, other public authorities, international organisations, NGOs and social partners in order to prepare, implement, monitor and evaluate the national programmes. Stakeholders meet regularly in a monitoring committee set up to follow the national programme's implementation.

For **direct management**, it is the Commission that centrally and directly supervises budget implementation through EMAS and UAs. Funds are earmarked by the EU through calls for proposals, procurement, and direct awards, as planned in the annual work programme[33]. Under **indirect management**, the Commission entrusts, through delegation agreements, budget implementation tasks to Member States (or to bodies designated by them), international organisations, Member States development agencies, EU agencies, and other bodies, because they are best placed to carry out those activities and also because of the limited human and administrative resources available in the Commission[34].

3.2 Description of the implementation status

3.2.1. Shared management

According to the legal base, the total programmed EU contribution for shared management was EUR 2.496 billion consisting of EUR 1.705 billion for national programmes and EUR 791 million for the development of (existing and/or new) IT systems that support the management of migration flows across the external borders. The allocation to national programmes was further broken down to:

- EUR 1.276 billion to national programmes, of which up to 40 % is available for operating support, with EUR 128 million to be distributed under the mid-term review; and
- EUR 147 million for specific actions; and
- EUR 154 million for the Special Transit Scheme.

Regarding funds allocated to IT systems, only EUR 145.7 million will be provided via ISF-BV, with the remaining amount expected to be provided through the 'Smart Borders' and 'Schengen Information System II' budget lines managed by the Commission as well as directly by two EU agencies (eu-LISA and Frontex).

At the end of the interim evaluation period 26 national programmes were approved[35] and the resources allocated for adopted national programmes stood at EUR 1.533 billion.

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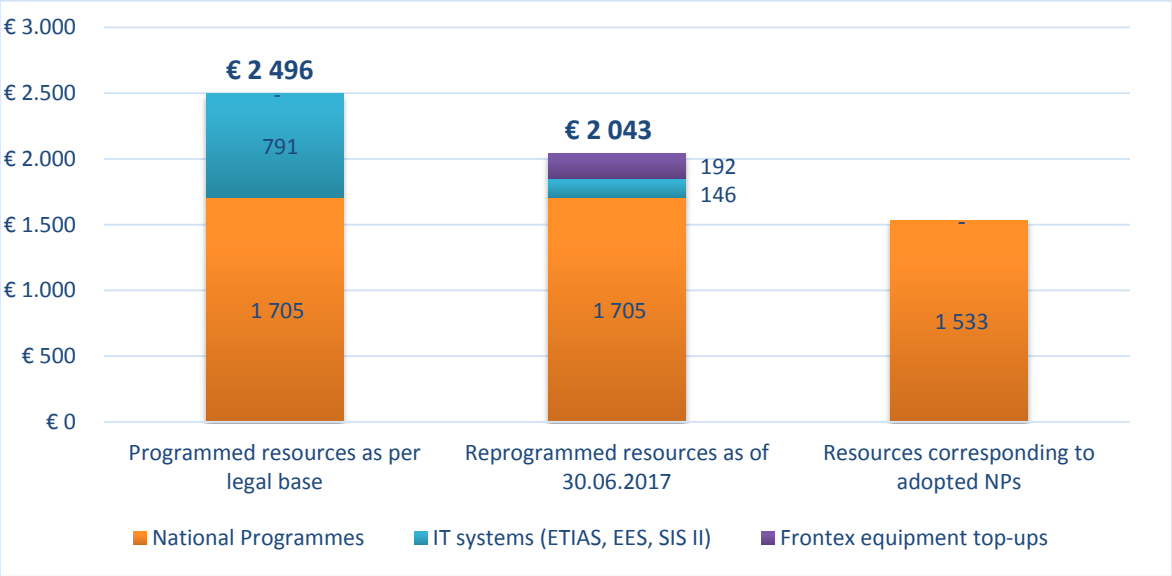
33 The annual work programme is a planning document explaining how the budget allocated for certain policies or funding programmes will be spent.

34 Commission staff working paper –impact assessment for the 2014-2020 funds (SEC(2011)1358).

35 NO, CH, LI and IS are not approved in the period covered by the interim evaluation.

By 31 December 2016[36], Member States had drawn down EUR 584 million of the total EU resources available for the period 2014-2020 for national programmes that were adopted, with an **implementation rate** of 38 %. Total payments cleared under the accounts for 2014-2016 amounted to EUR 178 million, resulting in a very low **payment rate** of 12 %.

Figure 3: ISF-BV shared management: Allocation of global resources to shared management 2014-2020 (EUR million)

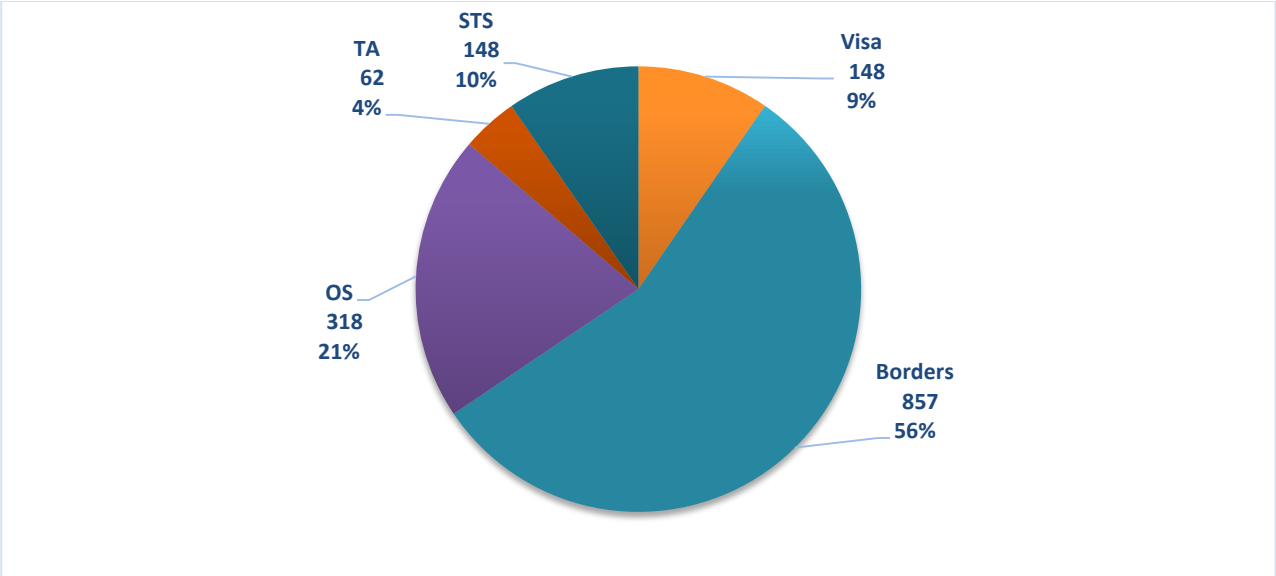


Disaggregating **data by ISF-BV's objectives** as reflected in the Shared Fund Management Common System of DG HOME (SFC2014[37])**,** resources have been earmarked for specific objective Borders (with 55.9 % of the planned EU commitment/available EU resources for adopted national programmes), followed by operating support (with 20.7 %), STS (with 9.7 %) and specific objective Visa (with 9.6 %). 4.1 % was dedicated to technical assistance.

Figure 4: ISF-BV — EU planned resources 2014-2020 under the specifc objectives for adopted national programmes (EUR million)

[36] The reference period for shared management ran from January 2014 until 31 December 2016, which corresponds to the period covered by the last set of accounts submitted by Member States and cleared by the Commission.

[37] SFC2014 is an IT system used for electronic exchange of information concerning shared fund management between Member States and the European Commission.



For **specific objective Visa**, the Member States that spent the highest amounts on financed projects related to this objective are France, Spain, Cyprus, and Italy, with EUR 24.1, 11.2, 9.6, and 8 million respectively. Member States that spent the lowest amounts are Estonia, Liechtenstein, and Iceland, with projects funded for less than EUR 1 million.

- Three Member States (Belgium, the Netherlands and Spain) have developed activities to strengthen consular cooperation through new or improved infrastructure and buildings (co-locations, common application centres, representations and other infrastructural means). In particular, a total number of 4 actions — out of the 35 expected by national programmes — were put in place: 2 from the Netherlands and 1 each from Belgium and Spain.

- Eight Member States[38] have engaged in activities aimed at developing and improving consulates' physical structures and equipment, to help them perform visa-issuing services in a more effective and efficient way. Specifically, 156 consulates — out of the 911 expected to be covered by national programmes — have been developed or upgraded, of which: 85 belong to Belgium, 39 to Estonia, 13 to France, and the remaining 19 to Cyprus (9), Finland (6), Spain (2), Sweden (1), and Austria (1). In terms of the implementation rate, according to the annual implementation reports for 2016, 7 Member States[39] display a rate between 1 % and 100 %.

- Seven Member States[40] have already assigned *Immigration Liaison Officers* and other professionals with specialised functions, to maintain direct contacts with host Member States, enabling the effective implementation of EU measures to tackle illegal migration and improve information-sharing mechanisms with the host Member States. Member States have deployed 105 officers — out of the 392 expected to be covered by national programmes, of which: 30 belong to Germany, 23 to France, 20 to the Netherlands, and the remaining 32 to Austria (14), Belgium (8), Spain (7), and Hungary (3).

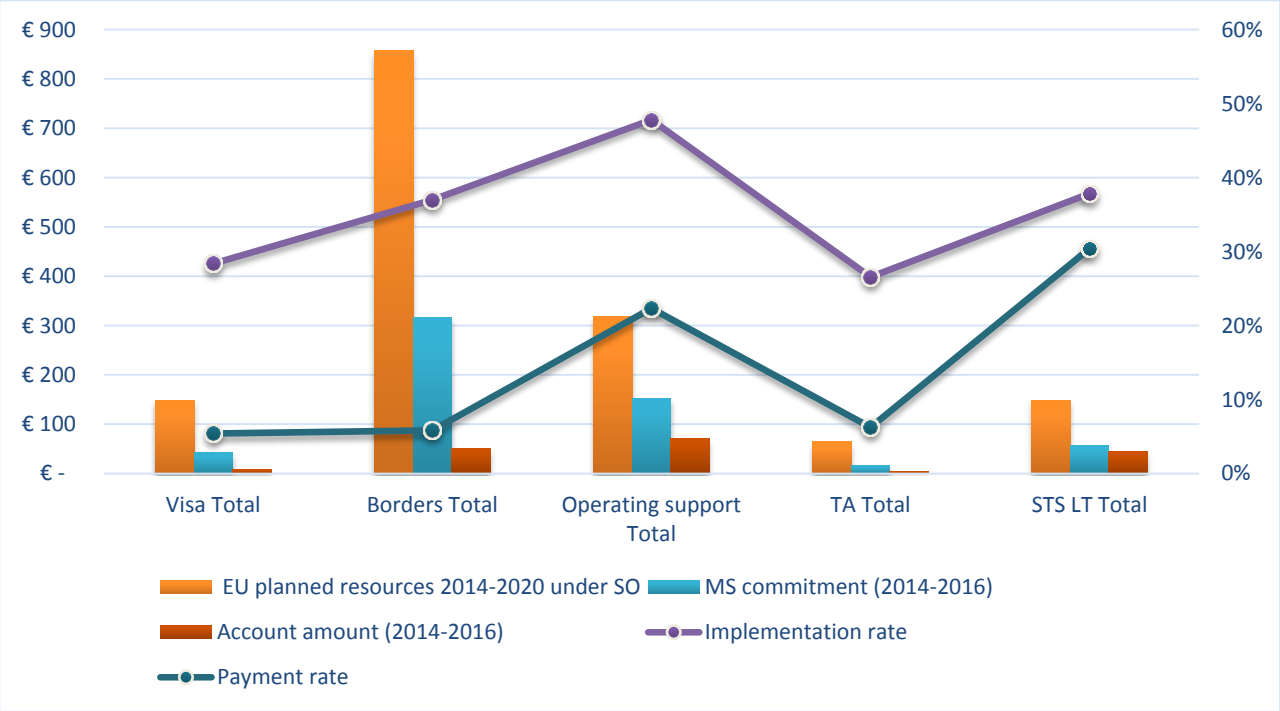
For **specific objective Borders**, the Member States that spent the highest amounts on projects related to this objective were Italy, Greece, and Spain, with EUR 142.3, 124.2, 102.1 million

38 AT, BE, CY, EE, ES, FI, FR and SE.
39 AT, BE and BG (100 %), CH (39 %), CY (9 %), CZ (8 %) and DK (1 %).
40 AT, BE, DE, ES, FR, HU and NL.

respectively. In the remaining 16 Member States projects were financed for less than EUR 45 000 in each country. 11 Member States[41] have not provided data under the referred indicator. As regards border control, 8 Member States[42] have developed or upgraded 1 414 (out of the 12 454 expected to be covered by the national programmes) infrastructure and equipment items aimed at strengthening border checks and surveillance. According to the AIRs for 2016, the remaining 22 Member States have not implemented any actions yet.

In terms of the **implementation rate**, as shown by Figure 4, the operating support displays the highest values (48 %), followed by STS (38 %), borders (37 %), visa (28 %), and technical assistance (27 %). Regarding the **payment rate**, STS displays the highest values (31 %), followed by operating support (22 %), borders (6 %), technical assistance (6 %), and visa (6 %).

Figure 5: ISF-BV — EU planned resources 2014-2020 for adopted national programmes, Member States commitment 2014-2016, account amounts (EUR million), implementation and payment rate, by objective



The implementation rate, on the other hand, shows that Member States are actually much more advanced in their implementation on the ground and that the difference between the two rates is expected to be claimed in the financial records over the following years.

In addition, breaking up data by Member States (Figure 6), ES (EUR 208 million), EL (EUR 194 million), IT (EUR 188 million) and LT (EUR 180 million) are the four Member States which have the highest value of available resources for their adopted national programme. Overall, these Member States have been allocated 50 % of the total available EU resources 2014-2020.

In terms of the implementation rate, EE has attained a percentage of 87 %, followed by MT (83 %), AT (69 %), BG (66 %), LV (61 %) and BE (61 %). 18 Member States[43] have currently achieved an implementation rate of between 12 % and 60 %. Finally, 2 Member States[44] have not committed

41 LI, LV, LU, MT, ML, PL, PT, RO, SE, SI and SK. It is important to highlight that LI's national programme is in the process of being approved.

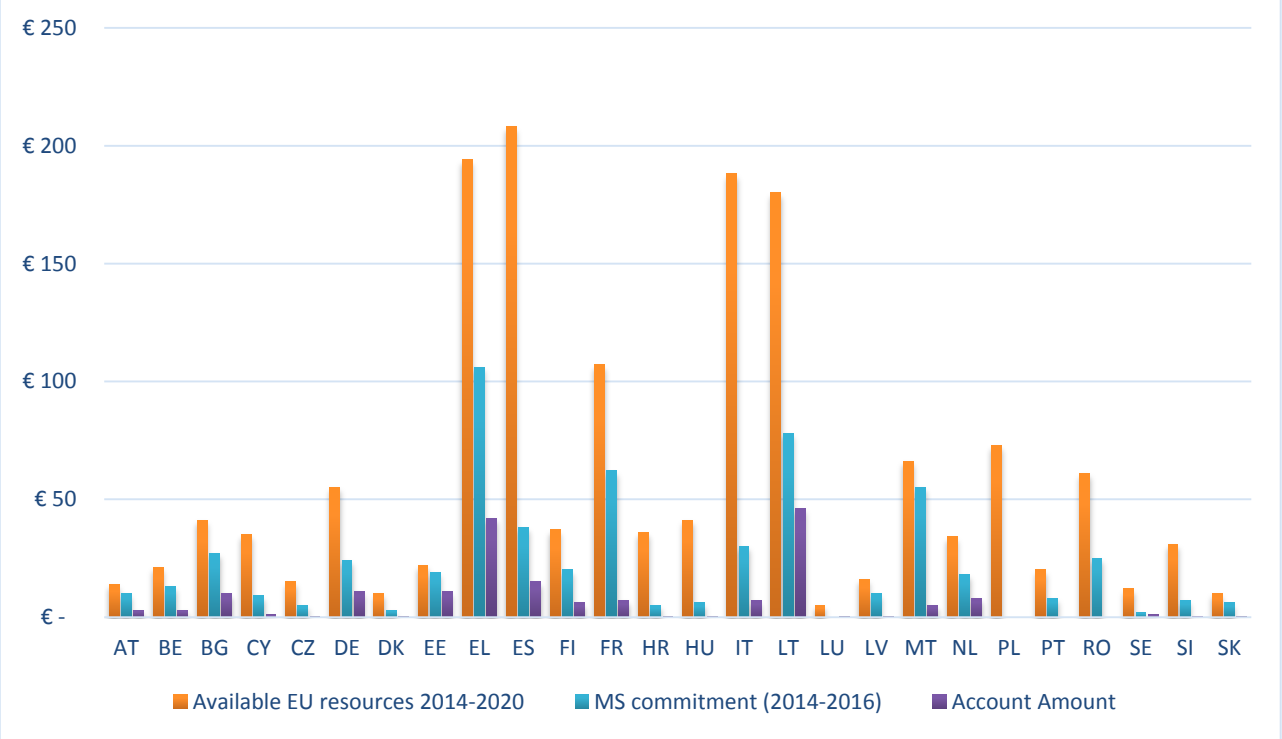
42 EE (823), BG (243), DE (190), ES (129), CY (14), HU (11), BE (2) and IT (2).

43 In descending rate order: SK (59.24 %), FR (57.52 %), EL (54.30 %), NL (53.64 %), FI (53.39 %), DE (44.47 %), LT (43.17 %), RO (40.82 %), PT (38.84 %), CZ (34.38 %), CY (27.50 %), DK (24.24 %), SI (22.25 %), SE (20.15 %), ES (18.36 %), IT (15.69 %), HR (14.16 %) and HU (13.86 %).

44 LU and PL.

resources, displaying a rate of 0 %. The payment rates vary significantly across Member States: only 1 Member States, EE, has attained a percentage of 50 %, 16 Member States[45] have currently achieved a payment rate between 1 % and 26 %, whereas 5 Member States[46] display a payment rate under 1 %. Finally, 4 Member States[47] display a payment rate of 0 %.

Figure 6: Available EU resources 2014-2020 for adopted national programmes, Member States commitment (2014-2016) and accounts amounts (2014-2016), by Member States (EUR million), including top-ups.



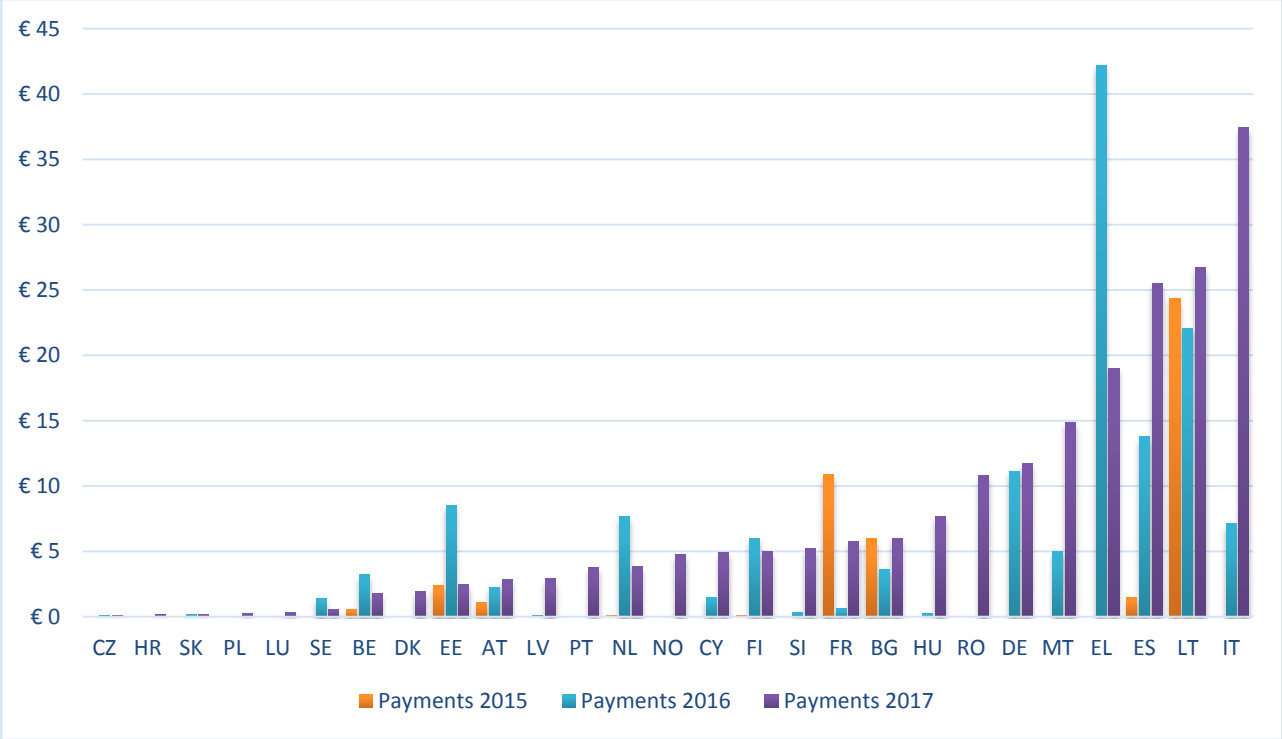
Taking into consideration the annual accounts for 2017 submitted by the Member States in mid-February, we can conclude that the overall payment rate improved from 12 % to 24 %, with Italy, Lithuania, Spain and many other Member States making significant improvements as illustrated in the figure below.

[45] In descending rate order: LT (25.74 %), AT (23.15 %), BG (23.13 %), NL (22.70 %), EL (21.70 %), DE (20.21 %), FI (15.48 %), BE (14.59 %), SE (12.39 %), MT (7.64 %), ES (7.34 %), FR (6.79 %), CY (4.22 %), IT (3.77 %), SK (1.86 %) and SI (1.12 %).

[46] In descending rate order: LU (0.98 %), CZ (0.56 %), HU (0.53 %), LV (0.52 %), and DK (0.22 %).

[47] HR, PL, PT and RO.

Figure 7: ISF-BV payments 2015-2017 (EUR million)



3.2.2. Direct management

The AWPs for 2014-2017 allocated a total amount of EUR 414 million for EMAS (EUR 372 million) and UAs (EUR 42 million). Over the period 2014-2017, 90 % of resources have been allocated for EMAS, whereas only 10 % was allocated for UAs. UAs have been planned by the EU to allow for transnational actions or actions of particular interest to the EU to be funded. These actions concern the general, specific, and operational objectives set by Art. 3 of Regulation (EU) 515/2014[48]. EMAS actions have been planned to allow Member States to address urgent and specific needs in emergency and unpredictable situations requiring a timely and effective response[49]. The original planned amount envisaged for EMAS was multiplied by 11. Therefore, the reason behind the disproportionate planning between UAs and EMAS may be found in the need to properly face the unexpected and unprecedented migratory flows, which put significant pressure on the most affected Member States, during 2015 and 2016.

By 30 June 2017, a total of 123 actions (46 EMAS and 77 UAs) were financed under the direct management for a total amount of EUR 383 million out of the EUR 414 million planned for resources for the 2014-2017 AWPs. In terms of the **implementation rate**[50], beneficiaries spent 6 % of total committed resources (EUR 271 million), with a total payments amounting to EUR 17 million.

48 Regulation (EU) N. 515/2014, Art. 13.1; annual work programmes 2014-2017.

49 Regulation (EU) N. 515/2014, Art. 14.1; annual work programmes 2014-2017.

50 The implementation rate for direct/indirect management is calculated by dividing the amount of payments, including pre-financing and final payments, made to a finalised project by the amount awarded in the grant agreements (commitments).

Table 6: AWPs planned resources, by different implementation mechanisms

	AWP 2014	AWP 2015	AWP 2016	AWP 2017	Total
Action grants	€9 163 194	€45 800 000	€249 983 495	€77 976 516	**€382 923 205**
Procurement	€1 600 000	€1 667 000	€2 200 000	€2 690 000	**€8 157 000**
Delegation agreement	€4 500 000	-	€5 000 000	€2 300 000	**€11 800 000**
Other	€450 000	€3 580 000	€2 750 000	€4 260 000	**€11 040 000**
Total	**€15 713 194**	**€51 047 000**	**€259 933 495**	**€87 226 516**	**€413 920 205**

Emergency assistance measures

Over the period 2014-2017, the EU allocated a total amount of EUR 371.6 million to cover the priorities and objectives set by AWPs for EMAS. By 30 June 2017, 7 Member States[51], 1 EU Agency[52] and 1 international organisation[53] were beneficiaries of a total of 46 EMAS actions. The total committed resources amount to EUR 257.5 million, while payments, including both pre-financing and final payments, for completed actions stand at EUR 12.8 million. The pre-financing paid on ongoing EMAS actions amounted to EUR 143.7 million. It is important to highlight that, for EMAS measures, the maximum possible co-financing rate of eligible costs is up to 100 %[54].

In terms of the overall **implementation rate**, it stood at 5 % as of 30 June 2017, which is due to the fact that only 7 EMAS projects out of 46 had been completed by that time. However, when we look at the implementation of those 7 completed projects, it stands at an impressive rate of 95 %.

Most EMAS actions were financed in 2015 (17) and 2016 (22) — the years when the migratory crisis peaked. IT and EL were the main beneficiaries of EMAS actions, with 18 and 17 measures financed respectively. Considering the financial support provided to each Member States, BG, IT and EL are the main beneficiaries under EMAS, with an initial grant amount[55] of EUR 124.8, 59.5 and 55.9 million respectively, followed by SI (EUR 4.9 million), HR (EUR 4.0 million), FR (EUR 1.7 million), and HU (EUR 1.5 million). As regards other organisations, UNHCR has received EUR 4.1 million and EASO has received EUR 1.1 million.

51 BG, EL, FR, HR, HU, IT and SI.
52 EASO
53 UNHCR
54 AWPs 2014-2017.
55 The amount refers to the initial EU allocation (grant amount). This could eventually be subject to a decommitment.

Figure 8: Distribution of EMAS by Member States, by committed and paid amounts by June 30.2017 (EUR million)

Based on the type of measures put in place, EMAS can be grouped as follows:

1. improvement of operational capacities (28 out of 46 measures);
2. acquisition and purchase of transport, operating equipment (such as search and rescue and border surveillance equipment, photo-finger printers), and IT systems for a better and appropriate reaction to the emergency situation (8 out of 46 measures);
3. support to staff and costs to keep equipment fit to address emergencies (7 out of 46 measures);
4. linguistic and intercultural mediation services (3 out of 46 measures).

EMAS has also contributed to the Greek hotspots[56] by providing funds for food, shelter, medicines and transport at the hotspots[57] and funds for strengthening the fingerprinting capacity[58].

Union Actions

Over the period 2014-2017, the EU planned a total amount of EUR 42.3 million to meet the priorities and objectives set by AWPs for UAs. A total number of 77 UAs have funded beneficiaries based in nine Member States[59]. It should be noted that 7 out of the 77 actions are being implemented via action grants with none completed by 30 June 2017, with the remaining ones being implemented via procurement of services directly by the Commission.

- *Action grants*

The total committed resources for the seven action grants amounted to EUR 3.8 million, while the implementation rate as of 30 June 2017 stood at 0 % with no final payments made by that date. The

[56] The Hotspot approach was developed as part of the European Agenda on Migration. The operational support provided to Member States is concentrated on registering, identifying, fingerprinting and debriefing asylum seekers. It is also concentrated on return operations. The Member States cooperate closely with the Commission and a few EU agencies (EASO, Europol, Frontex and Eurojust) in order to operationalise the concept. So far 10 hotspots have been created in Italy and Greece.

[57] HOME/2016/ISFB/AG/EMAS/0030, HOME/2016/ISFB/AG/EMAS/0022.

[58] HOME/2015/ISFB/AG/EMAS/0018 (EASO).

[59] BE, BG, DE, EL, ES, FR, LU, NO and PT.

pre-financing paid to date amounted to EUR 1.2 million. It is important to highlight that, for such measures, the maximum possible co-financing rate for eligible costs is up to 95 %[60].

Based on the type of measures put in place, action grants can be grouped as follows:

1. EUROSUR (two projects in ES and PT);
2. Visa processing (one project in DE);
3. Regional cooperation on border management (two projects in BG and EL);
4. Schengen Masterlist Border Control Pilot (two projects in NO and PT)[61]

Figure 9: Distribution of action grants by identified clusters, by committed amounts by June 30 2017 (EUR thousand)

- *Procurement*

The total committed resources for 70 actions falling under the category of procurement, administrative arrangements and service level agreements amounted to EUR 9.4 million while payments on completed actions amounted to EUR 4.2 million, which corresponded to 52 completed actions out of 70 and an implementation rate of 45 % as of 30 June 2017. Procurement essentially covers services that the Commission purchased directly and focuses primarily on the financing of different evaluation mechanisms, most of which are linked to the Schengen evaluation.

Most of the contracts were concluded in 2015 and 2016[62]. Due to the nature of procurement, most contractors are based close to the Commission's headquarters. Therefore, **Belgium** is the Member States with the most contracts (57), followed by France (9), Germany (3) and Luxembourg (1).

Based on the type of measures put in place, procurements can be grouped as follows:

1. evaluation mechanisms, mainly Schengen evaluations (41 procurements);
2. IT Systems for border management (9);
3. visa processing (1);

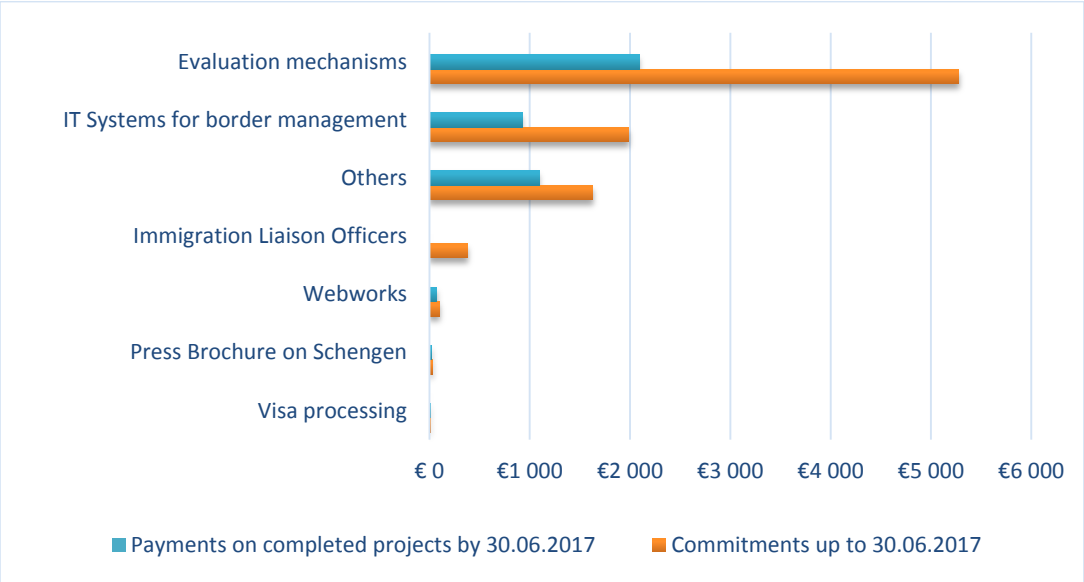
60 Union actions annual work programme 2014-2017.

61 Schengen Masterlists are secure container file-structures, cryptographically signed to prevent alteration, which contain Country Signing Certification Authority certificates validated by at least 3 Member States and by which the Commission would like to promote the use of electronic authentication of any electronic document.

62 The lower number of UAs assigned to countries in 2017 may depend on the fact that data only takes into account the first half of the year.

4. immigration liaison officers (2);
5. press brochure on Schengen (3);
6. webworks (1);
7. others (13).

Figure 10: Distribution of UAs by identified clusters, by committed and paid amounts by June 30 2017 (EUR thousand)



3.2.3. Indirect management

The 2014-2017 AWPs allocated, as of 30 June 2017, a total amount of EUR 12 million for indirect management instruments, out of which 42 % of the overall amount was allocated for 2016, 38 % for 2014, and only 20 % for 2017.

Operationally, 81 % of the overall resources provided for through the AWPs have been allocated, for a total amount of EUR 9.5 million. By 30 June 2017 a total amount of EUR 7.9 million was paid as pre-financing with no final payment made by the cut-off date.

In particular, during the period 2014-2017, the EU entrusted budget implementation tasks, through delegation agreements to the following bodies.

- **eu-LISA** in order to carry out the 'Smart Borders Pilot' testing phase, in the context of a 'Proof of Concept' exercise, as part of the Smart Borders Package adopted by the Commission on 28 February 2013. To implement the given tasks, the EU entrusted a total amount of EUR 3.5 million, with EUR 3.3 million in pre-financing.

- The International Centre for Migration Policy Development (**ICMPD**) to implement the action 'Mobility Partnership Facility', in order to support mobility partnerships and common agendas for migration and mobility, in the context of the Global Approach to Migration and Mobility (GAMM)[63]. The action has been put in place under different financial instruments (AMIF, ISF-Police and ISF-BV) for a total estimated amount of EUR 5.5 million, of which a maximum of

[63] COM(2011) 743 final, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - The Global Approach to Migration and Mobility.

EUR 1 million was entrusted under the ISF-BV, with EUR 800 thousand paid in pre-financing up to 30 June 2017.

- **UNHCR** for implementing the action 'Support to Greece for the development of the hotspot/relocation scheme as well as for developing asylum reception capacity', helping to create 20 000 reception places. The action has been put in place under different financial instruments (AMIF and ISF-BV) for a total estimated amount of EUR 83.3 million, of which EUR 5 million has been entrusted under the ISF-BV, with EUR 3.75 million paid in pre-financing up to 30 June 2017.

4. METHOD

4.1 Short description of methodology

This evaluation assesses how the Fund has worked so far and informs the national authorities, the EU institutions, the stakeholders and the general public about the key achievements and limitations of ISF-BV. It does attempt to explain how the Member States and the Commission plan to address weaknesses and overcome obstacles identified, to ensure that during the second half of the implementation period corrective actions are taken and the impact of any weaknesses are minimised. This forward-looking aspect of the interim evaluation will also contribute to the preparation of the next generation of funding instruments going beyond 2020.

Similarly to the *ex post* evaluation of the EBF, the predecessor programme, this evaluation was carried out by an external consulting firm Ernst & Young between September 2017 and February 2018. It was coordinated by the HOME Funds Evaluation Team in Unit E3 of the Commission's Directorate-General for Migration and Home Affairs with the support of an Inter-Service Steering Group comprising other Commission services.

The Commission's evaluation relied on an external study. It required a systemic synthesis of the evidence regarding the ISF-BV's implementation. The methodology for data collection included both desk and field research. The data collected was subject to quantitative and qualitative analysis.

Desk research essentially consisted of a review of:

- the relevant legislative documents (i.e. EU Treaties, ISF-BV Regulation);
- policy documents (i.e. European agendas on migration and on security;
- Commission communications;
- *ex post* evaluations of SOLID funds (in particular the EBF);
- Member States national programmes;
- AIRs;
- national interim evaluation reports[64] (NIERs);
- grant agreements;
- final technical implementation reports;
- final financial implementation reports;
- mission reports from monitoring visits to beneficiaries carried out by the Commission staff;
- *ex post* audit reports;
- results of the mid-term review: and
- minutes from policy dialogues preceding the set-up of ISF-BV.

The analysis also relied on statistical data from SFC2014 for shared management actions and on ABAC[65] data for direct and indirect management actions.

Field research covered different tools used to include multiple stakeholders categories according to the consultation strategy presented in Annex 2. It consisted of 50 phone interviews — exploratory phone interviews conducted during the inception phase and phone interviews with national

[64] 31 Member States were received as LI did not submit its Member States due the fact that no actions covered by ISF-BV were implemented during the period covered by the interim evaluation.

[65] ABAC is the European Commission's accounting IT system.

responsible authorities (RAs), delegated authorities (DAs) and with relevant Commission services and agencies. Interviews at national level covered all Member States with external borders and that issued high number of visas, ensuring geographical and EU funding balance. An online survey was also carried out to address a wider number of stakeholders, including audit authorities (AAs), beneficiaries of multiannual programmes and union actions, members of the monitoring committees and experts. The response rate to the survey was almost 15 %. Moreover, eight case studies were produced with a close focus on six Member States (BG, EL, ES, FI, IT, and LT), EUROSUR (covering both direct and shared management) and consular cooperation (specific action). The case studies illustrate practical examples of projects carried out by Member States with ISF-BV support. Finally, information gathered through the targeted public consultation, launched by the Commission in December 2017 was also analysed[66]. Information was triangulated to ensure validity and robustness.

4.2 Evaluation questions

In line with the Better Regulation guidelines, this interim evaluation addresses evaluation questions structured around the five evaluation criteria of effectiveness, efficiency, relevance, coherence and EU added value, as well as the criteria of complementarity, sustainability, and simplification and reduction of administrative burden introduced by the Horizontal regulation[67].

The complete list of evaluation questions as set in the legal base can be found in Annex 4. An overview of the answers to the evaluation questions can be found in Annex 4.

4.3 Limitations and robustness of findings

A first limitation of this interim evaluation concerns its timing: it is taking place only 3 years after the ISF-BV was launched, with many national programmes only being approved after delays, while most projects have only just started, making their assessment very challenging. Therefore, the evidence on the results and impact of the Fund is very limited. Nonetheless, this evaluation is not able to produce a full picture of the programme's results and impacts and cannot draw final conclusions, as insufficient time has lapsed since the beginning of the programming period and the Fund is still being implemented.

Concerning the indicators, limitations include issues related to data availability and the measurability of impacts (for example, most of the ISF-BV's indicators focus on outputs). Often, these indicators are not linked to the Fund's specific objectives. Therefore it is really difficult to attribute the observed changes to the Fund. The information gathered though primary sources is limited, since stakeholders have no clear idea of the results brought about by the Fund. Therefore the gathering of information focused more on procedural issues, providing a very general perspective on the Fund's implementation, with sporadic examples found on the ground. Also, the reliability of Member States indicators was rather low as in many cases common indicators were not available or equal to 0. This hindered the statistical analysis of the Fund's implementation and financial progress as well as the data comparison across Member States. In some cases, misalignment of data was noted between the national programmes, AIRs and in the NIERs.

Concerning the period covered by the interim evaluation, for shared management actions the cut-off date was 31 December 2016, which is linked to the period covered by the latest set of accounts submitted by the Member States and cleared by the Commission. For actions under direct and

[66] Only 4 responses have been received by representatives of RAs (2 from IT, 1 from BG and 1 from EL).
[67] Regulation (EU) No. 514/2014.

indirect management, the cut-off date was 30 June 2017. The different cut-off dates did not allow the Fund to carry out a parallel assessment and comparison of results achieved under different implementation modes.

Another limitation has been the lack of benchmarks to compare performance, mainly because AMIF and ISF are the first home affairs programmes to have a common monitoring and evaluation framework and a set of indicators (common, result and impact). In addition, many of these indicators have been viewed as being not relevant or not easy to populate with data and maintain.

The contextual exogenous factors linked to the migration crisis itself are also a significant limitation. The Fund adapted itself to the changing needs, which made it difficult to evaluate its functioning and implementation against its initial design.

Furthermore, while most of the interviews were conducted as planned, the response rate to both the online survey (15 %) and the Open Public Consultation (OPC, only four respondents) was very low. This hindered data triangulation, allowing comparison only for those issues for which responses were provided. Therefore, in some cases, evidence is based only on desk research, in other cases the documentary analysis is triangulated with interviews, and in fewer cases triangulation also included the survey and the OPC.

Regarding the STS operated by Lithuania, it should be noted that the Lithuanian national interim evaluation report does not contain an evaluation of the scheme. Wherever there are references made to the STS throughout this document, they are solely based on the interviews carried out by the external consultant with the relevant stakeholders.

In the evaluation, these limitations were mitigated to the extent possible. The analysis of the evidence has allowed the Commission's services to identify problems with data availability and quality that could be overcome over the course of the interim evaluation. Conclusions have been drawn, where possible, based on the triangulation of evidence from various data sources, indicated transparently. The use of multiple information sources made it possible to have an overview of the implementation state-of-play and of the Fund's results. When answers were not provided to the online survey, information was gathered through the analysis of the national documents and, in some cases, confirmed (or not) by interviewees. The low number of participants to the surveys was counterbalanced by the analysis of national interim evaluation reports. Even though these reports were often not exhaustive, they made it possible to gather information on all Member States, and identify trends and divergences across them. Whenever possible, the *ex post* evaluations of the predecessor SOLID programmes have been used as a benchmark.

5. ANALYSIS AND ANSWERS TO THE EVALUATION QUESTIONS

5.1 How effective has ISF-BV been so far?

This evaluation question aims to provide an insight into whether ISF-BV is on track to meet its objectives. The borders and visa instrument has two specific objectives — one linked to a **common visa policy** and the other to supporting **integrated border management**. Overall there are seven operational objectives — four of which are relevant for the common visa policy and six of which are relevant for the integrated border management. There are evaluation questions (see Annex 4) addressing each operational objective (see Table 4).

5.1.1. Effectiveness in supporting a common visa policy

Shared management

In a nutshell

The Fund has contributed to implementing the EU common visa policy in an effective manner. It facilitated legitimate travel. Information-exchange and training activities contributed to the EU's acquis on visa policy being uniformly implemented. The Fund played an instrumental role in developing IT systems supporting a common visa policy. All these together contributed towards (i) a high quality service for visa applicants, (ii) equal treatment of third-country nationals and (iii) tackling illegal migration. The Fund's contribution in consular cooperation and in strengthening cooperation with third countries has so far been limited.

The EU has a common visa policy for short-stay visits to the Schengen area, comprising of a set of harmonised rules setting out (i) the countries whose nationals require a visa to travel to the EU and those who do not, (ii) the procedures and conditions for issuing short-stay visas, (iii) a uniform format for visa stickers and (iv) a common Visa Information System that records all visa applications and decisions. EU Member States are among the world's leading tourist destinations — the number of visa applications processed by Member States has increased considerably over the last 8 years and continues to expand. Since 2009, applications for EU visas have risen 50 % — from 10.2 million to 15.2 million in 2016 coupled with increased costs of processing of visa applications. The EU's common visa policy has also been affected by the migration crisis with increased pressure on consular staff worldwide and an increasing need for cooperation on irregular migration and return.

Overall, the Fund has significantly contributed towards the achievement of a common visa policy, as confirmed both by the stakeholders and by the implementation results of the national evaluation reports[68]. The following five aspects of the common visa policy were addressed in the evaluation:
1) facilitation of legitimate travel;
2) better consular coverage and harmonised practices on visa issuance;
3) implementation of EU's *acquis* on visas;
4) cooperation between Member States; and
5) IT systems and communications infrastructure and equipment.

[68] All Member States. Interviews with 4 RAs (BE, BG, FR and NO). 65% (n=42) of replies to the online survey: 3 AAs (HR; CY and LV), 13 Member States (BE, CZ, EE, FI, HU, LV, PT and RO), 1 EMAS beneficiary (EL), 1 Ministry of Foreign Affairs (SK), 21 members of Monitoring Committee (AT, BG, CY, EE, LV, MT, RO, SI, ES and ,SE), 2 RAs/DAs (FR and SI), 1 expert.

The Fund contributed to the **facilitation of legitimate travel**, strengthening Members States' national capacities by, for instance: (i) co-financing projects for strengthening national capacity to verify the authenticity of documents used for visa applications, (ii) developing information systems for coordinating visa applications[69], and (iii) procuring security equipment for consular representations in third countries. All this leads to Member States being in a better position to grant visas to those visa applicants with legitimate applications. In particular, projects under the Fund supported the purchase of technical equipment (e.g. document checking devices, communication equipment) to make the processing of Schengen visa applications more efficient and to support national information-sharing platforms to combat visa abuse and document fraud. Training also supported legitimate travel[70], by providing consular staff with technical and up-to-date information on visa issues and related systems.

As regards **consular cooperation**, the *ex post* evaluation of the EBF revealed that Member States showed little interest in developing projects in this area mainly due to (i) the perceived high cost of common visa application centres or (ii) perceived issues linked to cost-sharing with other Member States resulting in Member States choosing to keep their representations in third countries. The Commission decided to incentivise this area through offering co-financing at a rate of 90 % in the national programmes under ISF-BV, while the scope was extended beyond common application centres to include other types of consular cooperation in addition to refurbishment, adaptation and/or equipping of consulates. Despite these measures, the Fund's contribution towards consular cooperation has been quite limited so far, with many Member States not implementing any projects in the area yet. However, those Member States that have carried out consular cooperation activities gave positive feedback on the Fund's contribution. For instance, it helped increase **consular coverage** by supporting the establishment of new consular posts and other forms of cooperation (e.g. joint training courses, joint consular offices) that incentivised Member States to establish consular representation agreements to improve visa processing and to promote a common approach to visa issuance[71]. The use of the Visa Information System facilitated the exchange of both information on fraudulent visa documents and best practices on implementing Schengen standards[72]. Training courses also contributed towards **harmonising practices on visa issuance**[73]. Many Member States[74] reported that visa harmonisation was supported through a better exchange of information and best practices being shared between Member States.

There were difficulties in implementing joint projects between Member States[75] due to the different national eligibility rules of expenditure, checks, and other rules related to the posting of staff[76]. In particular, Member States[77] involved in specific actions on consular cooperation asked for standard and clearer eligibility and expenditure rules at EU level to harmonise and ease the management of such actions. Currently, it is not possible to assess the effectiveness of the specific action as only a few projects have started and even those are in their initial stages. However, it is interesting to note

69 BE, EE, and EL.

70 AT, HU and LV.

71 7 Member States (EL, FR, HU, LU, MT, NO and PT).

72 i.e. As a result, up to 44.253 persons using fraudulent travel documents were detected at consulates supported by the Fund.

73 AT, EE, IT, NL and LT.

74 7 Member States (EL, FR, HU, LU, MT, NO and PT). 4 interviews: RAs from LT, NO and PT and one delegated authority from EL; results from the online survey: 7 Member States (AT, BE, CZ, LU, LV, NL and RO), 2 representatives from Monitoring Committees (AT and BG).

75 2 interviews with RAs (BE and PT). 9 participants to the Eighth Meeting of the Evaluation Network (BE, CH, EE, ES, HU, LT, NL, NO and PL).

76 In some Member States only the posted officer receives financial support, in others staff members can also bring their family along.

77 2 interviews with RAs (BE and PT). 9 participants to the Eighth Meeting of the Evaluation Network (BE, CH, EE, ES, HU, LT, NL, NO and PL).

that most Member States considered the needs addressed by the specific actions — harmonisation of visa issuance and increasing visibility and consular coverage of Member States — as particularly appropriate in light of current migration pressure[78].

Ensuring the correct and uniform application of the **Union's *acquis* on visa** has been supported either through mixed projects also pursuing other objectives, or through projects targeted specifically to this objective. Training courses targeted staff responsible for visa issuing[79] and consular officials, police, and border guards engaged in developing and implementing the common visa policy[80]. In some cases, training courses aimed to disseminate best practices among consular officials and to provide them with specific language courses or knowledge on the changing legal situation at EU level in the field of visa. Some Member States organised training sessions for consular services on security (e.g. illegal migration) and document verification (i.e. document fraud detection, counterfeit or forged travel documents, and documents necessary for visa application)[81]. Other training courses supported the implementation of the EU common visa policy and the Schengen *acquis*, concerning in particular the Community Code on Visas (Visa Code), including instructions for running Visa Information System and IT systems. Training was also aimed at improving the quality of services provided to visa applicants, to ensure equal treatment of third-country nationals in the visa-issuing process[82].

A number of Member States have used the Fund to **strengthen cooperation with third countries**[83]. Most projects in this area improved the exchange of information between authorities along the migration routes and on the return of illegal migrants. Furthermore, the Fund helped to tackle illegal migration by supporting the Member States in deploying temporary liaison officers and visa experts in consulates in third countries, who were directly responsible for the fight against fraudulent documentation or through consulates regularly consulting with each other in order to detect counterfeit documents[84]. Responsible authorities involved in cooperation actions with third countries gave positive feedback on the actions implemented[85].

The development of a common visa policy was also supported by means of **establishing and operating IT systems**, with particular regard to national Visa Information System, in order to ensure an efficient and smoother visa processing. The use of new technologies enabled the authorities to comply with the changing technical/legal requirements of the common visa policy, including the introduction of the biometric passports and related compliance checks. The development of IT systems was often accompanied by staff training measures so as to ensure that consular officials, police and border guards have sufficient technical expertise, as well as to ensure sustainability.

Operating support guarantees the capacity and uninterrupted functioning of the systems and maintenance of equipment[86]. This is a key factor for ensuring security since well-functioning IT systems are crucial for promptly detecting potential threats. Operational shortcomings may lead to the security system being jeopardised. The operating support for Visa measures also proved to be

78 BE, FR, HU, IT, LT, NL and PT.
79 13 Member States (AT, BE, EE, EL, ES, FI, FR, HU, LT, LU, LV, SI and SK).
80 AT, BE, CZ, HU and PT. 1 interview with an responsible authority (NO). OPC: 4 Public Authorities (BG, EL, IT and IT).
81 BE, EE, EL, FR, HU and SI.
82 EE, HU, LV and SI.
83 13 Member States (AT, BG, BE, CH, CY, CZ, DE, EE, EL, FI, LU, MT and PL).
84 Results from the online survey: beneficiaries in 7 Member States (AT, BE, CZ, LU, LV, NL and RO), 2 members of Monitoring Committees (AT and BG).
85 3 interviews: 2 with RAs (BE and NL) and 1 with a delegated authority (EL). OPC: 3 Public Authorities (1 in BG, and 2 in IT).
86 8 Member States (AT, BG, DE, ES, FR, IT, LT and RO). Interviews with 3 RAs (BG, BE and PT).

useful in covering staff costs and other running costs related to the EU common visa policy's implementation, notably by strengthening national capabilities in the visa application process.

Direct management

For direct management, only one action grant and one procurement were dedicated to the area of visa processing. However no conclusions can be drawn so far as they had not been finalised during the period covered by the interim evaluation.

Examples of different types of visa projects implemented by the Member States

The Fund supported the development of a Visa Information System in many Member States (AT, BE, BG, CZ, ES, FR, LT, LV, and RO)[87]. In **Spain**, the visa-issuing procedures were boosted by: (i) including a Visa Information System in most consulates, (ii) improving and developing new functionalities in the national scheme for visas and VISMail; and (iii) developing measures complementary to Schengen Information System II. **France** has implemented a website https://france-visas.gouv.fr for visa applications that is already in use in 37 countries to facilitate the process of visa applications and to harmonise procedures. In **Austria**, the Ministry of Foreign Affairs deployed experts to diplomatic representations to conduct web-based and onsite legal and technical training for staff dealing with Visa Information System, providing targeted knowledge on legal and technical innovations relating to the Visa Information System rollout. Moreover, it provided regional training courses for consular staff focused on legal and technical visa issues and IT systems. In **Finland**, cooperation was boosted by means of strong support provided by the Immigration Liaison Officer (ILO) network through the training of embassy personnel involved in the visa granting process. ILOs help prevent illegal immigration by investigating the background of visa applicants and by examining the authenticity of documents. Furthermore, ILOs support the training of embassy personnel.

5.1.2. Effectiveness in supporting integrated border management

In a nutshell

The Fund has contributed to the implementation of integrated border management in an effective manner despite the migration and security crisis. The Fund contributed to the development of integrated border management policy. It increased solidarity among Member States by co-financing equipment used in Frontex joint operations. The Fund helped to develop the EU's acquis on border management. The Fund made a contribution to the development of EUROSUR and border management IT systems. Limited progress was registered regarding promoting the development, implementation and enforcement of policies with a view of ensuring the absence of any controls on persons, whichever their nationality. Currently, the Fund is not supporting Memebr States in the application of the *non-refoulement* principle. EMAS played an important role in addressing the emergency needs at the beginning of the period and bridged the funding gap until the adoption of national programmes.

[87] 9 Member States (AT, BE, BG, CZ, ES, FR, LT, LV and RO). Results from the online survey: 5 beneficiaries (1 in AT, 2 in BE and CZ).

Under the integrated border management concept the evaluation looked into progress made and the Fund's contribution in the following six aspects:
1) absence of any checks on people when crossing the internal borders;
2) efficient checks on people and efficient monitoring of external border crossings;
3) gradual establishment of an integrated management system for external borders based on solidarity and responsibility sharing;
4) application of EU's *acquis* on border management;
5) boosting of situational awareness at the external borders; and
6) setting up and running IT systems including communication infrastructure and equipment.

Overall, the Fund contributed towards the overall objective on **integrated border management**, as confirmed both by the stakeholders and by the implementation results of the national evaluation reports[88].

In term of addressing the operational objective of '**promoting the development, implementation and enforcement of policies with a view of ensuring the absence of any controls on persons, whatever their nationality, when crossing the internal borders and to carry out check on persons and monitoring efficiently the crossing of external borders**' the effectiveness of ISF-BV was greatly influenced by the security and migration crisis at the beginning of the programming period. The unprecedented flow of migrants into the EU during this initial phase of the Fund's implementation, who crossed the EU's external border unchecked, resulted in secondary movements[89] of non-registered irregular migrants across the Schengen Area. This caused a severe strain on the Schengen *Acquis*, since the absence of internal border control is directly linked to the effectiveness of the controls at the external borders of the EU. As a consequence of the secondary movements and the security crisis, some Member States had to temporarily reintroduce internal border controls therefore affecting the Fund's effectiveness. Moreover, the crisis put a specific focus on the management of the EU's external borders.

However, the Fund contributed towards the **effectiveness of the border controls at the external borders** by supporting measures focused on the replacement/upgrading of:

- border control equipment (e.g. work stations, portable computers, border check stamps, communication equipment, copiers, specialised biometric identification equipment, optronic devices, mobile equipment for border offices); and
- surveillance (e.g. development of electronic surveillance systems, thermovision cameras, USB microscopes that make it possible to verify documents at distance, aerial vehicles)[90].

Border management capacity was addressed by means of introducing automated border control (ABC) gates[91] that speeded up the checks at the border crossing points. The ABC gates can be linked to national and international IT systems making the information exchange more efficient. Member States have also introduced the Public Key Directory[92], as a central repository for

88 All the Member States; interviews with 8 RAs (FI, PT, FR, BE, EL, NL, NO and PL); 1 delegated authority (EL); 73% of replies to the online survey (AT, BE, BG, HR, CY, CZ, EE, ES,FR, EL, HU, LV, MT, NL, PL, PT, RO, SI, and SE); 7 participants to the eighth meeting of the Evaluation Network (BE, BG, EL, HR, FR, HU and MT); OPC: 4 Public Authorities (1 from BG, 1 from EL, and 2 from IT); direct management: two technical reports (HOME/2015/ISFB/AG/EMAS/0001 and HOME/2016/ISFB/AG/EMAS/0018) and an interview with the BG Chief Directorate Border Police; indirect management: three technical reports (HOME/2014/IM/LISA/0001, HOME/2014/MULT/IM/ICMP/0001 and HOME/2016/MULT/IM/UNHC/OOO1).

89 Secondary movements of migrants comprise movements from the Member States they arrived in to other Member States.

90 BG, EE and FI.

91 15 Member States (BE, BG, CH, CY, DE, EE, EL, ES, FI, HU, IS, LU, LV, PL and SI).

92 BE, BG, FI, MT and PL.

exchanging information required to authenticate ePassports and to verify the authenticity of travel/identification documents. Further projects are carried out in the following fields:

- modern technical equipment for border surveillance, including engineering appliances and the TETRA communication system;
- document verification devices such as document testing equipment for faster and more efficient processes;
- mobile scanning vehicles;
- mobile application for carrying out border checks; and
- purchase of document readers for portable border control devices[93].

With the Fund's support Member States carried out training activities in the area of border management, with the aim of improving staff awareness and competencies in relation to border management and the use of related IT information systems. The Fund supported the implementation of the **EU's *acquis*** by co-financing training activities and programmes, which helped to improve the technical, operational and linguistic skills of the staff responsible for border management[94]. Furthermore, this objective was indirectly supported by actions aimed at facilitating the cooperation and exchange of information with other Member States since such interventions strengthened the awareness of the Member States obligations at EU level and supported harmonised practices among Member States[95].

Solidarity and responsibility sharing between the Member States is expressed mainly through joint operations; cooperation between Member States under EUROSUR and through cooperation with Frontex. So far some EUR 200 million has been spent on specific actions to support the purchase of Frontex equipment by 14 Member States, to be used in Frontex-coordinated joint operations[96].

The Fund contributed to the development of EUROSUR[97] by co-financing activities both under Member States national programmes and under Union actions. These activities aimed to improve situational awareness and increase the reaction capability at the external borders by detecting, preventing and combating illegal immigration and cross-border crime and by helping to protect and save the lives of migrants[98]. Activities under EUROSUR also contributed towards solidarity and responsibility between Member States which is an important aspect of the operational objective on integrated border management. It needs to be pointed out that the actions financed by the Fund under the national objective of EUROSUR are interpreted in a much broader manner than the implementation of the action provided for by the EUROSUR Regulation (2013/1052). For example Member States could include in their national programmes, under the national objective EUROSUR, projects such as purchasing surveillance equipment or developing border surveillance systems which are linked to border surveillance in general, but not directly to EUROSUR's implementation.

The Fund also provided support for the **development of IT systems**, notably for the upgrading and operation (under operating support) of the Schengen Information System (Schengen Information

93 9 Member States (BG, DE, EL, FI, FR, HR, HU, IT and LV).

94 5 Member States (AT, BE, CZ, HU and PT). 1 interview with responsible authority (NO). OPC: 4 Public Authorities (BG, EL, IT and IT).

95 4 Member States (IT, PL, PT and RO).

96 AT, BG, DE, ES, FI, FR, GR, IT, MT, LT, LV, PL, PT and RO.

97 Regulation (EU) No 1052/2013 of the European Parliament and of the Council of 22 October 2013 establishing the European Border Surveillance System (EUROSUR).

98 Results from online survey: 58% (n=46). 2 AAs (CY, LV), 20 beneficiaries (AT, BE, CZ, EE, FI, HU, LV, LU, MT, NL, PT, RO and SE), 1 EMAS beneficiary (EL), one expert (UK), 20 members of monitoring committee (AT, BG, CY, EE, HU, LV, MT, RO, SI and SE), 2 RAs/DAs (FR and SI).

System II). This allowed the Member States to upgrade and maintain the IT systems and ensure their interoperability[99] and interconnectivity between the different national systems, which in turn contributed to a more effective management of the EU's external borders.

Under the specific objective of integrated border management, it is specifically indicated that the Member States should respect human rights and the principle of *non-refoulement*. Two Member States[100] reported that the maintenance and modernisation of border control buildings and facilities, and the introduction of modern technologies for border control contributed to ensuring international protection for those needing it and respect for the fundamental rights and the human dignity of third-country nationals. Two Member States[101] reported that human rights issues were tackled through specific training sessions, with the support of EU agencies and international organisations working in the field of migration and human rights (e.g. IOM, UNHCR, and Frontex). One Member States[102] reported implementing an action focused on acquiring linguistic and cultural mediation, aiming of facilitate communication between the State Police and migrants during landing and/or rescue operations as well as when applying for international protection. Furthermore, another Member States[103] reported a project still being implemented that aims to strengthen the development of training schemes on human rights and fundamental freedoms. Currently, the Fund is not supporting Member States in applying the *non-refoulement* principle.

Regarding direct management, 6 out of 7 action grants awarded under UAs are linked to border control, surveillance or management. However none of them had been completed within the evaluation period. Therefore, it is premature to reach any conclusions on their effectiveness.

As for Emergency assistance (EMAS), only 7 out of 46 EMAS actions had been finalised in the period covered by the interim evaluation. EMAS has been used in seven Member States, especially in Greece, Italy and Bulgaria during the migration crisis to deal with the extra pressures at the external borders. In Bulgaria, for example, the amount of EMAS support in the period 2014-2017 amounts to EUR 124.8 million which is three times higher than the allocation for the national programme covering the whole period 2014-2020. Therefore, the Fund's effectiveness in this specific case depends to a large extent on the interaction between the EMAS support and the national programme. EMAS support has been considered essential in addressing emergency needs. The situation is somewhat different in both Greece and Italy as their EMAS allocations under ISF-BV are smaller than in the case of Bulgaria but the size of their respective national programmes are much larger. Nevertheless, EMAS has been an important component in all these countries in dealing with the crisis especially when the national programmes were not yet running due to delays in approval.

While EMAS measures proved to be a very efficient instrument in rapidly addressing a number of emergency situations arising from the migration crisis, action grants under UAs were less popular. Member States expressed limited interest in them with few proposals received to the calls published by the Commission. They are also subject to lengthy delays in implementation. Perhaps their design including eligibility rules could be adapted to better address Member States' needs.

Overall, the Fund has contributed towards ensuring a high level of security in the EU as far as it is possible at this stage of the implementation, also taking into account the migration and security crisis. The results achieved so far show that the Fund is an effective tool in supporting Member

99 11 Member States (AT, BE, BG, CH, CY, DE, EE, EL, FI, LT and LU).
100 BG and SK.
101 HU and IT.
102 IT.
103 CY.

States in achieving a common visa policy and an integrated border management. Implementation delays were mainly linked to the late approval of the national programmes, but now that programmes are running, the Fund's implementation is on track. All the Fund's implementation modes contributed towards the achieving the Fund's objectives. As regards shared management, the Fund contributed to ensuring a high level of security in the EU while facilitating legitimate travel, through a uniform and high level of control of the EU's external borders and the effective processing of Schengen visas. Direct and indirect management modes contributed to more effective border and visa management through addressing urgent and specific needs in emergency and unpredictable situations requiring a timely and effective response and through projects promoting transnational actions or actions of particular interest to the EU. These actions helped to strengthen the national capacity in the operational management of both borders and visa matters.

Examples of different types of border management projects implemented by the Member States

Austria supported the procurement of thermal imaging vehicles for Frontex operations to increase the value of border police operations in other Member States, simplifying and improving border management. Also in the **Czech Republic** and **Poland,** the Fund co-financed the acquisition of thermal processing to strengthen the protection and surveillance of the external borders. In **Slovenia**, a key investment in strengthening the situational awareness at the external borders was the purchasing of two police patrol boats for the control of its maritime border to obtain data for the national situational picture using the navigation systems and by reporting important events. Both vessels are permanently in use, and data are collected and processed within the national coordination centre.

5.2 How efficient has ISF-BV been so far?

This question aims to consider the relationship between the Fund's inputs (i.e. resources, budget etc.) and the outputs and results that it achieved. It tries to answer two questions: (i) to what extent the effects of the ISF-BV actions were achieved at a reasonable cost in terms of financial and human resources deployed and (ii) what measures were put in place to prevent, detect, report and follow-up cases of fraud, and other irregularities.

In a nutshell

Overall, in the limits of available data, it could be considered that the results of the Fund were achieved at a reasonable cost in terms of both human and financial resources. Some Member States have put in place national efficiency measures. However, most Member States face problems with the EU guidance, common indicators, and the reporting/monitoring calendar. The perceived administrative burden can be considered as a factor that undermines efficiency.

Shared management

A number of findings from the EBF *ex post* evaluation address issues related to efficiency, which have been taken into account in the ISF-BV's design such as more flexible multiannual programmes, sufficient allocation of resources at Member States level, simplified structure of the Fund, improvement of the overall evaluation tools, etc. all of which have an impact on the Fund's efficiency.

According to the evidence gathered by the external evaluation, overall, the results of the Fund were achieved at a reasonable cost in terms of both human and financial resources[104] as far as it is possible to assess at this stage. The perceived administrative burden can be considered as the main factor that undermines efficiency.

The national programmes' implementation started very slowly creating challenges for evaluating the Fund's cost-effectiveness because the majority of the projects are still ongoing. The Fund's overall implementation is now on track. For shared management, a 38 % implementation rate has been achieved. The payment rate stood at 12 % by the end of 2016. Possible reasons for such a low payment rate may include:
1) late approval of most of the national programmes;
2) complexity and length of public procurement procedures that delayed implementation, especially the purchasing of patrolling equipment such as vessels, boats, helicopters etc.;
3) administrative burden (i.e. reporting requirements in relation to the annual accounts) that delayed implementation; and
4) low pre-financing rates, hampering Member States commitment and the payments[105].

Taking into consideration the annual accounts for 2017 submitted by the Member States in mid-February, we can conclude that the overall payment rate improved from 12 % to 24 %, with significant improvements noted for Italy, Lithuania, Spain and many other Member States as illustrated in Figure 7.

Low levels of costs for human resources were associated with the national programmes' implementation (at responsible authority or delegated authority level). In terms of number of full-time equivalents (FTEs) in the responsible authority, delegated authority and audit authority in comparison to the number of projects implemented, the large variation found may suggest that the method of award (direct award, call for proposals etc.) and the type of action to be implemented (i.e. specific action or regular project under the national programme) affect the number of FTEs needed.

On average, 7.08 FTEs per Member States have been involved in managing the Fund and have been paid through technical assistance[106] and/or national budgets, with remarkable differences between the different Member States. For example, at the time, Belgium had 3 FTEs to manage 27 projects and an allocation for the national programme of EUR 17.5 million, while Italy has involved 14 FTEs in managing 22 projects and an allocation of EUR 156.3 million. Overall, considering the average number of projects implemented by 2017 (12.84), an average of 0.55 FTEs was engaged per project.

Overall, Member States show a growing or stable number of FTEs over the years from 2014 to 2017, except Germany (FTEs decreased in number from 25 to 21) and Malta (FTEs decreased from 13 to 10). On average, the number of FTEs increased from 2.44 in 2014 to 6.80 in 2016, increasing further in 2017. In addition, considering the ratio between technical assistance, plus the administrative indirect cost, and the amount of the funds claimed for the financial year, on average the ratio stood around 1.41. In this regard, the ratio increased significantly over the years from 0.16 in 2015 to 0.67 in 2016, and more than doubled in 2017. Considering the ratio FTE (average)/amount of the funds claimed for the financial year (average), 0.5 FTEs have been

[104] As also confirmed by 18 Member States (AT, BG, CH, CZ, DE, ES, FR, HU, LU, MT, NL, PL, EL, HR, IS, SE, SI and SK); 10 participants to the eighth Evaluation Network Meeting (BE, BG, FI, HR, HU, NL, NO, PL, PT and RO).

[105] Conclusions of the AMIF-ISF Committee questionnaire, 2016; interviews with the Commission staff.

[106] Technical assistance should enable the Member States to support the implementation of their national programmes and assist beneficiaries in complying with their obligations and EU law.

involved per million for the implementation of the ISF. In this regard, there has been a significant decrease over the years, dropping from an average of 1.35 FTEs in 2014, to 0.72 FTEs in 2016, with a further decrease in 2017 to 0.5 FTEs, leading to decreasing labour intensity of fund management.

According to stakeholders, some of the success factors that brought efficiency have been the following:

- public agencies, as beneficiaries of the Fund could use their own networks to involve additional resources on an ad hoc basis and at no extra cost for the project;
- considerable knowledge and expertise had been gained through experience from previous projects (especially from SOLID and other programmes with multiannual projects);
- staff were already employed in the organisation; and
- the flexibility of the national programmes (their multiannuality).

Furthermore national measures concerning the application, implementation, monitoring and reporting processes have been put in place in some Member States[107] to ensure efficiency which include some of the following actions:

- administrative and technical project approval procedures;
- procedures to assess appropriateness of expenditure;
- responsible authority project monitoring mechanisms; and
- national coordination mechanisms.

There are also a number of issues that Member States believe negatively affect efficiency and these are:

- the requirement to allocate minimum percentages among national objectives[108];
- complex and recurrent reports[109];
- common indicators[110]: and
- the alignment of monitoring calendars[111].

Measures put in place to prevent, detect, report and follow-up cases of suspected fraud and other irregularities include:

- on the side of prevention:
    - careful examination of project applications;
    - *ex ante* public procurement control systems;
    - risk analyses by the responsible authority/delegated authority;
    - training courses on fraud prevention or fraud risk management;
    - provision of guidance tools; and
    - regular communication between projects and responsible authority staff;
- on the side of detection :
    - administrative control checks;
    - operational on-the-spot checks;
    - financial on-the-spot checks; and

[107] 7 Member States (AT, BE, FR, HU, MT, PL and SE). Interviews with 7 RAs (BG, CH, EL, FI, LT, PL and PT).

[108] 2 Member States (BE and SI). 9 participants to the eighth Evaluation Network Meeting (BE, CH, EE, ES, HU, LT, NL, NO and PL).

[109] 8 Member States (AT, BE, CY, CZ, ES, FR, IT and LV); 5 participants to the eighth Evaluation Network Meeting (BE, BG, DE, IT and NO); interviews with 2 RAs (BG and NO).

[110] 11 participants to the eighth Evaluation Network Meeting（BE, DE, CZ, FI, FR, HU, LU, MT, NO, PL and PT); 1 Member States (DE). Interview with 1 responsible authority (NO).

[111] 2 participants to the eighth meeting of the Evaluation Network（BE and FR). 3 Member States (BE, CY and FI). Interviews with 2 RAs (FR and BE). Results from the online survey: 3 beneficiaries (BE, CZ and LU) and 2 AAs (CY and HU).

- *ex post* audits;
- on the side of reporting and follow-up:
  - implementation of communication instruments;
  - establishment of procedures for reporting suspected fraud; and
  - establishment of procedures for corrective and deterrent measures.

The majority of Member States claims that the anti-fraud measures are appropriate and effective, stating that stringent mechanisms ensure the effective prevention of fraud and irregularities. Experience suggests, however, that there is always a potential trade-off between the procedures in place to prevent fraud and irregularities and the Fund's overall efficiency, in the sense that measures can be seen as very effective for preventing fraud, but they are not necessarily very efficient from a management perspective.

Direct management

Regarding the 7 action grants awarded under the UAs, none of them had been completed by 30 June 2017 and only 7 out of 46 EMAS actions had been finalised in the corresponding period. Consequently, their overall implementation rate is very low and it is too premature to reach any conclusions on their efficiency. However, it is worthwhile noting that for the seven completed EMAS actions the implementation rate was close to 100 %. As for procurement, which constitutes 19 % of UAs, its implementation follows the relevant Commission procedures and is considered to be efficient.

The human resources at the EU level have only slightly increased, despite the large increase in value of the EMAS and the emergency situation on the ground following the migration crisis, and the need to closely follow-up and assist those Member States under pressure while implementing their respective national programme. These factors have put an enormous strain on the Commission's services.

No data was available at the time of performing this interim evaluation on actions under indirect management.

5.3 How much simplification and reductions of administrative burden has ISF-BV brought so far?

The interim evaluation of the Fund proved that progress has been made in simplifying procedures for the beneficiaries under shared management with some room for improvement noted in relation to simplified cost options and the perceived high administrative burden. Beneficiaries under direct management benefited from increased simplification of procedures. Nonetheless, it is difficult to quantify how much simplification was brought by the ISF-BV overall. Therefore, a qualitative assessment has been made.

In a nutshell

A number of measures that aimed to simplify management procedures and reduce administrative burden have been put in place. Despite these measures, Member States still perceive administrative burden as being high and the implementation of the simplified cost options as problematic. Increased simplification has been noted under direct management.

Shared management

The EBF *ex post* evaluation[112] raised some efficiency issues also connected to simplification matters (i.e. the short terms of the programming cycle, the need to ascribe long-standing investments related to a multiannual programming framework to specific annual programmes). The Commission Staff Working Paper — Impact Assessment for AMIF and ISF recommended the introduction of the following components in order to increase simplification of management procedures and reduce administrative burden:
1) limiting the number of financial instruments to a **two-fund structure**;
2) setting up a common, underpinning instrument, laying down uniform rules and procedures under both Funds (**Horizontal Regulation**); and
3) a **multiannual programming cycle**[113].

All these recommendations have been taken on board by ISF-BV. First of all, the different instruments under the SOLID and SSL programmes have been replaced by only two funds: AMIF and ISF. In addition, Regulation (EU) 514/2014 (Horizontal Regulation), common to both Funds, and delegated acts have been introduced laying down a shared management framework to improve operational harmonisation and simplify implementation, monitoring, and evaluation mechanisms[114]. Furthermore, the Fund has been built up in line with a more flexible multiannual programming cycle[115], providing the right balance between the duration of EU terms of office and the need to ensure the higher stability of programming cycles, and allow higher investments' value and predictability[116]. All Member States confirmed the advantages entailed by the multiannual programming[117], including:

- the possibility to promptly identify strategic and long-term priorities, as well as to establish new emerging priorities to address up-and-coming unforeseen needs;
- the possibility to plan and implement large investments in the long run, without restrictions imposed by the annual implementation cycle; and
- the reduction of administrative overlaps and burden thanks to the annual programming cycle.

A number of measures were introduced to increase overall simplification The introduction of **national eligibility rules** provided for some flexibility in the management of the Fund by RAs by means of clearer rules compliant with the different national legislation and administrative procedures, which allowed beneficiaries to improve their understanding and operational capacity, therefore reducing the time needed for processing applications and delays in implementation[118]. While the introduction of national eligibility rules was considered as positive by most Member States, for some it was a hampering factor especially when it comes to multi-state projects. As for the **simplified cost options** (SCOs), particularly the flat rate applied to indirect costs, they (i) provided significant administrative simplification, (ii) made project management easier, (iii) led to a

112 Optimity Advisers and CSD (2016). *Ex post* evaluation of the External Borders Fund 2011-2013.
113 SEC(2011) 1358 final.
114 European Commission, 'The basic acts and other regulations of the 2014-2020 Home Affairs Funds: AMIF and ISF'.
115 Regulation (EU) 515/2014, (51) in alignment to Council Regulation (EU, Euratom) No 1311/2013 of 2 December 2013 laying down the multiannual financial framework for the years 2014-2020.
116 Answers by EU Officials interviewed during interviews and of 4 out of 30 Member States (BG, PL, MT and NL) providing an overview of ISF-BV's positive aspects and implementation issues during the eighth Meeting of the Evaluation Network.
117 All Member States. Interviews with 7 RAs (BG, PT, PL, FR, national programme, NL and LT). 50% of the replies to the online survey. Only Switzerland (interview with the Swiss responsible authority) has provided a different opinion, reporting that the multiannual programming has actually increased overall burden in terms of planning actions, since the seven-year timeframe does not enable support for actions that can effectively respond to the ever-changing context, nor does it provide support for the requirements in the fields of borders and visa management.
118 Member States: AT, DE, EE, EL, HU, LT, LU, MT, PL and PT. On the contrary, Cyprus stressed that the introduction of national eligibility rules, as they needed to be established anew, created higher administrative burden, especially at the beginning of the new programming period.

reduction of error rates and (iv) allowed RAs and beneficiaries to focus on outputs and results[119]. However, in some cases,[120] the **adoption of SCOs raised implementation issues**, due to the absence of common principles and standards which hindered or discouraged beneficiaries from declaring and reporting all costs, as they were afraid that audit authorities may declare costs ineligible.

The introduction of **operating support**[121] has been positively assessed, since it enabled national budgets to be supported on issues that would otherwise be difficult to cover (e.g. sustainability of maintenance costs)[122]. Moreover, the increased **cooperation between the responsible authority and beneficiaries**, also committed to by means of operational guidance and support directly provided by the responsible authority, is regarded as very positive, improving implementation and increasing the beneficiaries' compliance with monitoring, reporting, and verification requirements[123]. The **digitalisation of reporting and communication procedures** was positively assessed by several Member States, since it allowed financial and technical reports to be sent in electronic form, which shortened the document processing time for beneficiaries[124] and also facilitated the work of RAs thanks to the centralisation of all relevant documents and communications with the Commission in one electronic database[125].

As regards the **Special Transit Scheme for Lithuania**, the instrument has been assessed very positively by projects' beneficiaries, although there have not been significant changes, compared to the previous period[126]. However, despite the multiple measures introduced to increase simplification and the positive feedback they received[127], stakeholders agreed on the Fund's limited **contribution to reducing administrative burden**[128]. Monitoring, reporting, and verification procedures remain burdensome and many Member States pointed out a lack of detailed instructions, asking for more Commission guidelines in order to meet the monitoring and reporting standards required by the Commission[129]. Furthermore, the Common Monitoring and Evaluation Framework was established too late, which hindered the Fund's implementation since the reporting on projects had to be adjusted under the CMEF while projects had already started[130]. Also, the RAs of the Schengen Associated Member States criticised delays during the programming stage. In their opinion, simplification would have been increased by ensuring Schengen Associated Countries' accession to the Fund at an earlier stage, allowing them to begin implementing actions at the same time as other Member States[131].

119 Member States: CH, EL, FR, LT, LU and PL. Interviews with 4 RAs (BG, BE, NL and SI).

120 Webinar held on 14 November on ISF problem definition in the context of the Interim Evaluation to support the preparation of the next generation of EU Funds in the Home Affairs area; interview with the BG Responsible Authority. 37% of replies to the online survey.

121 Regulation (EU) 515/2014, Art.10.

122 Member States: AT, CH, CY, IS, IT and PT.

123 Member States: AT, BE and HR.

124 Member States: FI, BE, EE and PL.

125 Ibidem.

126 Member States: LT.

127 Details are provided further in this section.

128 Member States: AT, BE, BG, CH, CY, CZ, DE, EL, EE, ES, FI, FR, HR, HU, IT, LU, LV, MT, NL, PL, PT, SE and SI. Interviews with 6 RAs (NO, NL, BE, IT, ES and BG); 1 delegated authority (EL).

129 Interviews with BE, CH, and NO RAs and Webinar held on 14 November on ISF problem definition in the context of the Interim Evaluation to support the preparation of the next generation of EU Funds in the Home Affairs area.

130 CMEF was approved on 3 October 2016.

131 Interviews with CH and NO RAs.

Examples of the use of simplified cost options

In **Finland** and **Romania**, the use of the flat rate financing for indirect costs has facilitated beneficiaries, since travel costs do not need to be tracked in the bookkeeping[132]. On the contrary, **Hungary** could only implement simplified cost options to a limited extent, since the plan to use unit scale costs and lump sums for training projects was not approved by the responsible authority due to the presence of non-comparable cost categories, despite the projects being of the same naturet[133].

Direct management

Under direct management, procedures are considered to be appropriate, clear and transparent and do not create additional burden for Member States or beneficiaries[134]. Most difficulties encountered by beneficiaries in implementing EMAS actions are generally connected with national political issues[135] or operational difficulties related to the projects' implementation (i.e. lack of adequate and competent human resources to implement the measures)[136].

132 Member States: FI and RO.

133 Member States: HU.

134 Analysis of EMAS and UAs technical reports. Interviews with RAs: BG and IT. 71 % of replies to the online survey.

135 For instance, as regards the implementation of EMAS in Greece (HOME/2014/ISFB/AG/EMAS/0007 and HOME/2014/ISFB/AG/EMAS/0008), the austerity measures and capital control at national level created a limited vendor base and frequent requests for advance payments.

136 Analysis of EMAS and UAs technical reports.

5.4 How relevant has ISF-BV been so far?

This evaluation question aims to determine whether the Fund's original objectives are still relevant and how well they still match the current needs and problems. It also addresses the question of the Fund's flexibility against changing circumstances in the wider context.

In a nutshell

The Fund's original rationale and objectives are still relevant in the aftermath of the migratory crisis. Appropriate mechanisms have been put in place to address the changing needs both at the programming and implementation stages. The flexibility offered by the Fund, consisting of transfers of money between different objectives, helped to address the changing needs. However Member States would appreciate even more flexibility that would result from the minimum allocations of funds to objectives no longer being imposed and the number of national objectives being reduced.

The design of the national programmes, including the identification of key needs, priorities and objectives, was supported by the policy dialogue between the Commission and the Member States at the beginning of the programming stage. The policy dialogue took account of both the difficulties encountered during the EBF programming cycle and the new and emerging needs as reported at national level. In some Member States the objectives set in the national programmes were based on national strategic documents defining long-term goals and priorities, further helping to align the national programmes with the identified needs. A common problem perceived at national level was the migratory pressure at the external borders and related security threats. In this light, all Member States allocated more resources under specific objective Borders than under specific objective Visa. Also, given the fragmentation of actions under multiple national objectives that prevented the pooling of resources around key priorities and made it difficult to implement cross-objective projects. This has also led to an increased administrative burden as the Member States are required to report on the implementation of cross-objective actions for each national objectives concerned with the actions specific scope.

During the Fund's implementation, some **trends** increased the need for an effective EU action at its external borders. An increasing number of refusals of entry issued at the EU's external borders has been noted since 2014 with 115 862 registered in 2014, 130 279 in 2015, 215 403 in 2016 and a slightly lower number in 2017 - 183 548[137]. Document fraud detections at the Member States' external borders decreased steadily since 2014 on specific incoming routes[138] and reached their lowest level in the second quarter of 2016 compared to figures since the beginning in 2013[139]. Increased migratory pressure in the Central Mediterranean has been noted mainly due to West African arrivals with the highest levels of irregular migration reported in 2017[140]. The exceptional migratory pressure required common high standards of border management that fully comply with the rule of law and with fundamental rights in order to prevent cross-border crime and terrorism[141]. In this context, the Commission introduced an action plan as part of a broader effort to address the

137 Frontex Risk Analysis Annual Report 2018.
138 Ibid.
139 Frontex Risk Analysis (FRAN) 2016, Q2.
140 In the first quarter of 2017, irregular migration flows from Libya, Turkey, Algeria and Greece all increased, while the number of arrivals from Tunisia decreased (Frontex Risk Analysis (FRAN) 2017, Q1).
141 COM(2015) 185 final European Agenda on Security.

root causes of irregular migration, in cooperation with countries of origin and transit[142]. In addition, the visa liberalisation dialogues with neighbouring countries (Georgia, Ukraine, Kosovo and Turkey) raised the need for strengthened cooperation in the area of border control, requiring also a revision of the 'suspension mechanism'[143].

The identification of priorities to be covered by the ISF-BV national programmes was based on a thorough policy dialogue between the EU and the Member States, taking into account the difficulties encountered during the previous programming cycle, the new EU policy priorities and the new and emerging needs as reported at the national level. The interim evaluation also indicates that the Fund's scope is sufficiently broad to enable necessary actions to be implemented in the areas of external border management and the common policy on visa. Despite new and emerging needs which changed the migration picture, the Fund's objectives are still relevant and have adapted to challenges[144]. What also contributed to addressing the changing needs, is the **flexibility** offered by the Fund, i.e. Member States are allowed to transfer money between the specific objectives worth up to 15 % of the basic allocation without needing to revise the national programme.

Regarding **borders**, almost all Member States deemed the increasing pressure at the external borders as a significant challenge to their border control policy[145]. Such pressure resulted in an increase in the proportion of passengers that come from outside the Schengen area out of the total number of passengers[146]. As migration patterns are fluid and the composition of the flow is constantly changing, more attention needs to be paid to the link between border management, terrorism and cross-border crime and this is where both ISF-BV and ISF-P proved to be useful and relevant. Member States identified the following needs during the programming stage:

- increase border surveillance capacity[147];
- develop EUROSUR through:[148]
    - developing the EUROSUR national coordination centres;
    - developing and modernising automated surveillance systems; and
    - upgrading the National Situational Picture for EUROSUR through collecting related information and data so as to ensure compliance with EUROSUR requirements;
- maintain and further upgrade the national Schengen Information System II and link it with relevant international databases (Schengen Information System, SIRENE), and train border guards especially in Schengen Borders Code practices and modules from the Frontex Common Core Curriculum[149];

142 COM /2015) 285 final EU action plan against migrant smuggling (2015-2020).

143 This suspension mechanism ex Article 1a of Regulation (EC) No 539/2001 allows the visa exemption for third-country nationals to be temporarily suspended in certain emergency situations, as a last resort. The proposed revision was meant to strengthen the suspension mechanism by making it easier for Member States to notify circumstances leading to a possible suspension (COM (2016) 290 final).

144 Eighth Meeting of the Evaluation Network: BE, CH, EE, ES, LT, NL, NO, PL and HU. Member States: AT, CH, CY, CZ, DE, EL, FI, HU, IT, LT, LU, LV, NL, PL, PT, RO, SE, SI and SK. Interviews with 10 RAs (NO, PT, PL, BG, FR, NL, LT, NL, FI and IT) and 1 delegated authority (EL).

145 National programmes: BE, BG, CH and NL.

146 For instance in the baseline data given in the Swiss draft national programme, in 2015, compared to 2014, the number of asylum applications rose by 66.3% (from 23 765 applications to 39 523). Thus, Switzerland remained one of the primary destination countries for people crossing the central Mediterranean to Europe.

147 National programmes: CY, CZ, FR and IT.

148 A priority in the following National programmes: BG, CY, CZ, FI, FR, GR, HR, LV, LT, PL and SK. In the case of EE and FI, EUROSUR was emphasised as the most significant development in the coming years. On the contrary, EUROSUR was not a priority for NO and SI where all necessary infrastructure and equipment had already been purchased before the ISF was implemented.

149 Further information on the Frontex Common Core Curriculum can be found at: http://frontex.europa.eu/training/educational-standards/

- improve information exchange[150] (strengthen capacities of communication systems supporting the border control and further develop Visa Information System functionality for fluid communication between the various services);
- ensure the correct application of EU *acquis*[151] (training for staff tasked with guarding borders on the EU legal instruments, on the specific tasks in the process of border control in order to improve their professional qualifications and knowledge[152] incl. relevant language training for border guards[153]; and
- introduce common EU standards[154] (introduce ABC technology and strengthen controls at border crossing points) and improve the national Schengen Information System II and SIRENE through the operating support[155].

Regarding **visa**, the ever-increasing number of visa applications posed a challenge to consulates especially due to problems concerning the security of their premises and obsolete equipment for visa processing as reported by a number of Member States[156]. Consequently, the Member States identified a number of key needs during the programming stage[157], such as:

- developing the national visa systems including the improvement/replacement/maintenance of equipment;
- furnishing consulates with modern equipment to help detect falsified documents and upgrade network services[158];
- ensuring quality processing of visa applications and continuous improvement of the visa-issuing process;
- training consular officials and staff assigned to the national visa system on Schengen *acquis* and on counterfeited and false documents;
- establishing and/or maintaining consular cooperation with other Member States so as to exchange experiences, best practices, and knowledge;
- purchasing additional or replacing the existing IT and security equipment; and
- ensuring the exchange of information and connecting all visa authorities through the Visa Information System (VIS Mail phase 2 began operating on 20 January 2016)[159].

Furthermore, with regard to the **operating support**, it was mainly used for maintaining the Visa Information System[160] and ensuring proper functioning and further development of Schengen Information System II used at all border crossing points[161].

Despite evidence gathered on the relevance of the Fund, some areas for improvement have been reported by the Member States[162]. Basic amounts of resources had to be allocated to certain specific objectives outlined in the legal base for the ISF-BV (**minimum percentages**). However, where a Member State did not address one of the specific objectives in its national programme set

150 National programmes: BG, CZ, FI, FR and HU.
151 National programmes: BG, CZ, EE, FR, GR, HR, HU, PT, SK and SI.
152 e.g. training on implementation of Schengen Acquis, document forgery, methodological training, and handling apprehended vulnerable-persons.
153 Referred to in national programmes: FI and FR.
154 National programmes: DE, DK, FI, GR, IT, PT and SK. The installation of the ABC gates was a top priority in Iceland.
155 National programmes: LV, LU, PT and SI.
156 National programmes: CH, CY, EE and FR.
157 Source: National programmes.
158 For instance, a single internet service provider that will create a Multi-Protocol Label Switching network.
159 As underlined by the Hungarian national programme, it was necessary to invest in Visa Information System and interoperability for Visa Information System with existing and new IT systems. Similarly, Denmark intended to optimise 75 % of Visa Information System with the Fund's help. On the contrary, Switzerland covered this need through national resources.
160 5 national programmes (IT, CY, ES, FI and FR).
161 5 national programmes (FI, DE, HR, IS and SK).
162 Interviews with 2 RAs (BE and CH).

out in the ISF-BV Regulation or where the allocation envisaged was below the minimum percentage for some objectives, the Member States concerned had to provide a justification for deviating. Despite the afore-mentioned flexibility offered by the Fund, some Member States thought the number of national objectives was too high with the links between them unclear[163], resulting in the **fragmentation of projects** under different national objectives. This prevents the pooling of resources under the national objectives deemed most relevant at the national level. Therefore, some Member States suggested providing a smaller number of objectives with a cross-cutting and broader scope, which would increase the Fund's overall relevance[164].

Direct and indirect management

Both **direct and indirect management actions** proved **to be relevant**. They were complementary to national programmes and helped to achieve the Fund's priorities and objectives[165]. Their flexible operational architecture contributes to the Fund's relevance with action strategies being redefined according to actual emerging needs by means of simple and quick amendments to grant agreements (i.e. to get further administrative and operational support, modify the EU contribution or extend the period covered by the grant agreement).

The Fund may support **UAs**, i.e. transnational actions or actions of particular interest to the EU concerning the general, specific and operational objectives referred to in Article 3[166]. UAs should be aligned with the following aspects identified in the intervention logic:

- problems, i.e.
    - 'Member States have divergent interpretations and application of visa code',
    - 'IT systems potential is under used',
    - 'External border management is not fully integrated';
- needs, i.e.
    - 'Improving services for visa applicants, boosting practice harmonisation',
    - 'Supporting Schengen *acquis* on border and visa application',
    - 'Developing EU common border management system'; and
- impacts, i.e.
    - 'Enhanced situational awareness, through staff training concerned with border and visa management',
    - 'Higher, full, and interoperable use of (existing or new) IT systems',
    - 'Improved cooperation and dialogue with third countries, by means of agreements and partnerships',
    - 'Increased harmonisation to migration management and internal security'.

According to the analysis of UAs' 2014-2017 AWPs, the original priorities and objectives set by the legal base for UAs[167] are still relevant. It is possible to identify six clusters of priorities and objectives pursued by the AWPs that were relevant in order to address the needs over the period 2014-2017: (i) Schengen evaluation, (ii) EUROSUR, (iii) training of ILOs, (iv) regional cooperation, (v) coordination of research activities, and (vi) IT tools (Schengen Information System). Interviews conducted with beneficiaries of UAs confirmed the relevance of these

163 Member States: AT. Eighth Meeting of the Evaluation Network: BE and NL.

164 Member States: AT. Eighth Meeting of the Evaluation Network: BE and NL. Poland is not in line with this statement as it deems the rules governing the transfer of funds between different objectives as easing the Fund's management, allowing for flexible adaptation to the current needs.

165 Interviews with 6 RAs (BE, BG, FR, PT, PL and LT).

166 Regulation (EU) 515/2014.

167 Regulation (EU) 515/2014.

priorities. In particular, one Member States[168] stressed the importance of developing EUROSUR and increasing Member States cooperation in order to improve border control. To this end, it allocated a significant part of the Fund's resources to the control of the maritime external borders and to the establishment of an integrated network of IT systems with other Member States. Another Member States[169] confirmed that strengthening the cooperation between Member States by exchanging information and good practices was relevant for improving border surveillance and for preventing transnational organised crime.

EMAS actions ensured there was financial assistance to address urgent and specific needs in the event of emergency situations stemming from exceptional migratory pressure[170]. EMAS actions are aligned with problems ('Migratory pressure and security threats are increasing'), needs ('Tackling illegal migration'), and impacts ('Immediate taking on of unforeseen migratory pressure and risks through EMAS and adequate resource distribution') as identified in the intervention logic. According to the analysis of EMAS 2014-2017 AWPs, the above-mentioned problems and needs still remained valid over the period 2014-2017. However, their gravity has increased immensely as a result of the migration crisis[171]. EMAS has also contributed to the Greek hotspots[172] by providing funds for food, shelter, medicines and transport at the hotspots, and funds for strengthening the fingerprinting capacity on the ground. It should be also noted in response to the migration crisis the allocation of funds to EMAS increased 11 times.

As regards measures put in place to address changing needs, it is important to note that the needs identified during the programming stage did not change significantly during the Fund's implementation; rather it is the volume of issues to be addressed that increased as a consequence of the migration crisis[173].

A number of mechanisms have contributed to ensuring the Fund's relevance[174] and the Member States' ability to address changing needs.

At the beginning, the policy dialogues between the Commission and the responsible authorities enabled key needs to be identified and priorities and objectives to be designed accordingly[175]. The **consultative method** adopted with key stakeholders (the Commission and central authorities concerned with the Fund's implementation) and direct beneficiaries (generally public institutions and ministries) enabled their needs to be clearly identified during the programming stage[176] and emerging needs to be assessed alongside the programming cycle.

Changing needs were addressed through minor budgetary adjustments and transfers between the specific objectives of the national programme of up to 15 % of the basic allocation thanks to the **flexibility clause** in the legal base. This was considered to be a useful tool that enabled adaptation to the changing environment and allowed some fine-tuning during the implementation cycle[177].

168 Interview with 1 Union action beneficiary (PT).
169 Interview with 1 Union action beneficiary (ES).
170 Regulation (EU) 515/2014, Article 2 f) and Article 14.
171 Interviews with 7 RAs (BE, BG, EL, FR, LT, PL and PT).
172 The Hotspot approach was developed as part of the European Agenda on Migration. The operational support provided to Member States is concentrated on registering, identifying, fingerprinting and debriefing asylum seekers. It is also concentrated on return operations. The Member States cooperate closely with the Commission and a few EU agencies (EASO, Europol, Frontex and Eurojust) in order to operationalise the concept. So far 10 hotspots have been created in Italy and Greece.
173 Member States: CZ, DE, LT, PT and SK. Interviews with 4 RAs (NL, BG, PL and NO) and 1 delegated authority (EL).
174 Interviews with 6 RAs (BE, BG, FR, PT, PL and LT).
175 Member States: AT, BE, CH, CZ, MT and NL.
176 Member States: AT, BE, BG, CH, CY, CZ, EE, FR, HR, HU, IT, LU, MT, NL, RO, SE and SI.
177 Member States: AT and PL.

Furthermore, **continuous programme monitoring** during the implementation stage[178] allows the responsible authority to promptly analyse the content defined in the national programmes and to adapt to changing circumstances and emerging needs in cooperation with the Monitoring Committee (MC). Due to the changes needed, the responsible authority should consider whether a revision of the programme is necessary. Reprogramming may be required in order to address the recommendations following a Schengen evaluation report[179].

The **mid-term review** mechanism allows for a reassessment of needs and a dialogue with the Commission including the possibility to amend the programme where necessary, therefore ensuring that the Fund still corresponds to the actual needs[180].

In addition, the ISF **Monitoring Committee** has also contributed to ensuring that the Fund remains relevant. In fact, the Monitoring Committee should support the Fund's implementation. As evaluation reports show, the Committee also makes recommendations on how to improve implementation and payment capacities[181].

5.5 How coherent and complementary has ISF-BV been so far?

These evaluation questions look at the extent to which different ISF-BV actions work together internally and with other EU interventions and identify whether there are complementarities, gaps and overlaps between different initiatives.

5.5.1. Coherence

In a nutshell

The Fund is considered to be coherent with other EU and national interventions. Coherence with other EU financing instruments was ensured at the programming stage. Coordinating mechanisms have been put in place to ensure continued coherence at the implementation stage. The Monitoring Committee and the Responsible Authority play key roles in ensuring coherence.

ISF-BV funded actions were found to be coherent with other actions related to border management and visa system policy funded by other EU financial instruments, incl. AMIF and ISF-P, and from the national resources of the Member States. Some policy fields were found to be at a higher risk of overlapping with the Fund, including some areas under ESIF, the European Regional Development Fund and the Societal Challenge 'Secure Societies — protecting freedom and security of Europe and its citizens' under Horizon 2020. Nonetheless, no overlaps or duplications between the Fund and the aforementioned interventions have been found to date.

Internally, there is high coherence and complementarity between national programmes and EMAS, which have clearly supported each other and high coherence between national programmes and UAs (the latter being clearly design to complement the national programmes). EMAS especially played a significant role in bridging the gap until national programmes were fully adopted.

178 Member States: CH, FI, FR, HU, LU, MT, NL, PL, RO and SK.

179 Art. 12 of Regulation (EU) No. 515/2014 in accordance with Council Regulation (EU) No 1053/2013 of 7 October 2013 establishing an evaluation and monitoring mechanism to verify the application of the Schengen *acquis* and repealing the Decision of the Executive Committee of 16 September 1998 setting up a Standing Committee on the evaluation and implementation of Schengen.

180 Member States: FR, HR, PL and RO.

181 Member States: CZ, DE and LV.

However, there appears to be room for improvement, especially with regard to UAs and EMAS, because most ISF-BV beneficiaries were not aware of other ISF-BV financed actions and considered coordination to be an informal initiative. There is clearly a need for more formalised information at project and national level.

Several Member States carried out assessments of other EU interventions with similar objectives during the programming phase[182], covering in particular: European Structural and Investment Funds[183]; EU external relations instruments[184]; and other EU funds or programmes[185]. In other Member States[186], coherence was ensured by making it mandatory for project applicants to give an overview of the projects they implemented previously in similar areas with the support of EU funds or other instruments.

Most Member States adopted different coordinating mechanisms to ensure coherence with similar interventions carried out under other EU funds. The main ones are:

- information exchange on the Fund's actions and projects between the responsible authority and other institutional actors responsible for other funds at different levels and with Frontex;
- structured policy discussion — regular meetings to discuss strategic documents organised with the managing authorities of other EU programmes and interinstitutional working groups involving representatives of the potential beneficiaries[187]; and
- institutional arrangements, specific directorates, divisions, units, platforms, and committees set up to boost the coordination and synergies with other EU funds[188].

Most Member States emphasised the key role of specific actors including relevant public authorities at national level, international organisations, non-governmental organisations, etc. that contributed to the Fund's implementation, by (i) boosting synergies and preventing overlaps between ISF-BV, ESIF programmes, and other EU instruments and (ii) strengthening communication and coordination among actors concerned by different instruments[189]. Thus the MC was shown to be the main institutional tool that ensured the ISF-BV's complementarity and coordination with other funds. The MC includes, as members or as observers, representatives of institutions responsible for the use of other relevant funds. It holds regular meetings and continuously analyses the implementation status of ISF-BV projects. The Responsible Authority communicates regularly with relevant partners and other state administration authorities to avoid any overlaps, ensures there is no double-funding by examining and validating the original invoices, and implements the decisions of the MC.

Finally, ensuring coherence between the ISF-BV actions and other interventions with similar objectives at EU level is extremely important in order to ensure that external borders and the common visa policy are managed effectively. Some EU programmes have been deemed quite similar to the ISF-BV interventions. **Customs 2020** is the EU programme supporting the functioning and modernisation of national customs in the EU as well as administration cooperation

182 All national programmes; Member States: BE, DE, EE, FI, FR, HU, LT, LV, MT, NL and PL; interviews with 4 RAs (CH, BG, FI and BE).

183 European Regional Development Fund, European Social Fund, Cohesion Fund, European Agricultural Fund for Rural Development, and European Maritime and Fisheries Fund.

184 e.g. Instrument for Pre-Accession Assistance, European Neighbourhood and Partnership Instrument, and Instrument contributing to Stability and Peace.

185 e.g. Lifelong Learning programme, Cultural programme, and Youth in Action programme.

186 Member States: CZ, EE and IT.

187 AIRs: BG, IT and SI.

188 AIRs: AT, BG, CY, CZ, HR, MT and SE.

189 Member States: BE, CZ, CY, DE, EE, FI, HR, LV, LT, NO, PL, RO, SE, SI and SK.

for the period 2014-2020. No overlaps between Customs 2020 and ISF-BV have been noted so far[190]. Nonetheless, since Customs 2020 and ISF-BV share common objectives related to security issues and training, potential areas for synergies have been noted in those two areas[191]. Potential synergies have been looked for through joint meetings and work on documents and guidelines concerning co-operation aspects of border guards and customs services. The *ex post* evaluation of the EBF had already called for a better mapping and monitoring of programmes which include actions taking place at the external borders in order to check the possibility of joint procurement or training[192].

Actions funded by Frontex are also an example of an intervention that is coherent with ISF-BV. ISF-BV supports measures under Frontex joint operations in order to boost the Agency's operational capacity. This is enabled by the specific actions under ISF-BV. However, the need for more coordination between the Commission and Frontex was already underlined in the EBF's *ex post* evaluation[193] as one recommendation was to ensure that the Commission consults Frontex on the draft national programmes of the Member States before adopting them. This recommendation has already been taken into account in the ISF-BV Regulation, which in Article 9(4) provides for such obligatory consultation. During the programming period, the Commission consulted Frontex on all draft national programmes and took into account to the extent possible all comments received by the Agency. In addition, to ensure coherence between the activities financed by the ISF-BV and Frontex, the Commission put in place coordination measures that encompass electronic data exchange on purchases of Frontex equipment both under shared and direct management and provide Frontex with direct access to SFC2014 together with the related IT training.

Examples of national assessments of other interventions during the programming stage

In **Austria**, the co-financing agreements for projects financed by the BMEIA[194] contained a requirement for the project beneficiary to ensure there was no duplication. **Belgium** regularly organised consultations within the Steering Committee including representatives of the Foreign Affairs (External relation instruments), Social Integration, Interior (e.g. Horizon 2020) and Asylum-Migration offices. Furthermore, project applicants are requested to report on other sources of European funding they benefit from. In **Cyprus**, meetings with the relevant competent authorities were conducted during the programming stage for the examination of subjects of common interest and to avoid any overlap. In **Greece**, the responsible authority carried out extensive consultation with beneficiaries involved in other programmes to avoid duplication with other actions. **Italy** adopted an integrated approach to ensure coherence, relying on multi-sectoral (integrating policies, services, and initiatives referring to different yet complementary areas), multi-level (involving all relevant institutional actors), and multi-stakeholder (involving all relevant actors) mechanisms. Moreover, regular meetings between the RAs of AMIF and ISF-BV were organised to share information on activities implemented under the two funds.

190 However, according to a representative of DG TAXUD, synergies among different EU policies and instruments concerned with borders might by increased. Interview with DG TAXUD.

191 COMMISSION STAFF WORKING DOCUMENT Customs 2020 programme Progress Report for 2015.

192 Interview with DG TAXUD.

193 Conclusions of the *ex post* evaluation of the External Border Fund (EBF) 2007-2013; SEC(2011) 1358 final: COMMISSION STAFF WORKING PAPER IMPACT ASSESSMENT.

194 Federal Ministry for Europe, Integration and Foreign Affairs.

Examples of coordinating mechanisms to ensure the Fund's coherence with other interventions during the implementation stage

In **Bulgaria**, the International Projects Directorate within the Ministry of the Interior examines project proposals and partnerships with EU financial institutions[195]. Its activity is part of the national strategy to ensure the coherence and coordination with ESIF. ISF-BV's MC meets regularly to address potential duplications; ISF-BV's responsible authority meets monthly with beneficiaries of the ISF-BV projects to detect inter alia possible duplications with other projects. In **Cyprus**, since 2013, the Directorate-General for European Programmes, Coordination and Development is responsible for implementing the Europe2020 strategy and for coordinating the implementation of EU funds and programmes. In the **Czech Republic**, the Coordinating Committee 2014+ (KV)[196] was established within the Ministry of the Interior as an internal mechanism dealing with ESIF, AMIF, and ISF. The KV consists of several working groups covering all projects in order to prevent any overlap. In **Germany**, a clear separation between the objectives and approaches of AMIF and ISF in the area of migration was achieved by indicating the Federal Office for Migration and Refugees as being responsible for implementing AMIF and the Federal Police Headquarters for implementing ISF-BV. In **Sweden**, the SEFI Council (Council for the protection of EU financial interests) was set up to promote the efficient and accurate use of EU-related funds. A meeting 'Ensuring synergies and strengthening capacities for addressing migration and integration challenges in Sweden' was held jointly by the Swedish authorities and the European Commission on 17 February 2017.

5.5.2. Complementarity

In a nutshell

The Fund's objectives are complementary to other national policies. Complementarity with other EU financing instruments was planned at the programming stage. Coordinating mechanisms have been put in place to ensure complementarity at the implementation stage. Different implementation modes are complementary to each other.

The evaluation raised evidence on the complementarity between the objectives set in the national programmes and those set in national policies in the area of borders and visa[197]. No overlapping or duplication has been found.

As for synergies, the security research under Horizon 2020 with its border component is the main source of synergies with the ISF-BV. Other EU interventions with potential for synergies with the ISF-BV include ESIF, under which training for border police is financed, the ERDF, Customs 2020 and Frontex joint operations. It should be noted that so far, more emphasis has been put on minimising the risk of any potential overlaps rather than on synergies themselves.

Some Member States[198] carried out assessments of the national interventions with complementary objectives during the identification of the funding priorities and measures under ISF-BV. Different consultation, coordination, and collaboration mechanisms were put in place to ensure alignment with actions set in the framework of other national policies[199], including:

[195] The European Investment Fund, the European Investment Bank and the European Bank for Reconstruction and Development.
[196] The members of the KV are the deputies of the Minister of the Interior, the police president and the director of the fire rescue service.
[197] Member States: CH, CZ, EE, EL, ES, LT, LU, PL and SE.
[198] Member States: AT, BG, CZ, DE, EE, ES, FI, FR, HU and PL.
[199] Member States: BE, DE, ES, FR, HU and SI.

- financial instruments and mechanisms to ensure traceability and control of funding throughout the entire project lifetime;
- consultation mechanisms with key stakeholders; and
- application and project selection procedures that require the project's coherence and complementarity to be demonstrated.

The responsible authority and the MC also played a key role in ensuring the Fund's complementarity with national strategies in the field of visa and borders[200].

In Member States where no assessment was carried out at the programming stage, the complementarity was ensured through management practices during the Fund's implementation. More precisely, the wide stakeholder consultation during the programming stage allowed for high consistency of priorities and projects, therefore ensuring there were no overlaps with other relevant interventions[201].

The interim evaluation highlighted evidence on the complementarity among the Fund's different implementation mechanisms (shared, direct and indirect). Many Member States deem the different implementation modes as having directly contributed to meeting ISF-BV objectives, ensuring that all needs that are not covered by shared management instruments can be covered through direct or indirect management instruments[202]. Moreover, no overlapping or duplication was found between them, since they actually covered different types of actions[203]. Specifically, direct and indirect management were generally intended to be designed and implemented to improve and complement interventions planned under national programmes, or to fund interventions that cannot be implemented under shared management for several reasons (i.e. allocation limits, difficulties in reviewing national programmes). In particular, EMAS enabled the support of actions, which are difficult to be implemented under national programmes (due to allocation limits), since they address emerging and unpredictable needs arising from emergency situations. In addition, EMAS has played a significant role in bridging the funding gap until the national programmes have been adopted. EMAS has also improved private-public synergies[204]. UAs allowed the Member States to plan and implement cross-country projects, otherwise not affordable under the national programme[205]. Moreover, indirect management projects allowed the EU to entrust budget implementation tasks to partner countries or the bodies they have designated or international organisations provided with the necessary expertise and knowledge to properly manage and implement the measures required.

Examples of national assessments of other interventions during the programming stage

In **Cyprus** the complementarity issue of the objectives and actions was taken into consideration by the responsible authority in the programming phase. Furthermore, the country's DG EPCD[206] launched the EU Funds Web Portal in 2014 serving as an information hub for the public and businesses for all the cross-cutting EU programmes to enable further coordination among the funds. In the **Czech Republic**, the 'National Schengen Plan 2014' (NSP 2014) setting up the national strategy for visa policy was taken into account in the preparation of the national programme, thus ensuring mutual complementarity.
In **Switzerland**, the national IBM strategy was taken into account while the the National Programme was

200 Member States: AT, DE, EE, FI, HR, LT, LV, NL, PL, SI and SK.
201 Member States: BE, CH, DE, EL, HR, IT, LU, MT, PT and SI. Interviews with BE, BG, NO and PT RAs.
202 Eighth Meeting of the Evaluation Network: BE, BG, EL, HR, FR, HU, MT, NL and NO.
203 Interviews with the Commission officials, BG Chief Directorate Police, IT Navy and CIES Onlus (beneficiary of Italian EMAS), EL delegated authority.
204 Ibidem.
205 Interview with the Commission officials.
206 Directorate-General for European Programmes, Coordination and Development.

being prepared and was used in particular to prioritise the measures planned under the ISF-BV. This ensured that the objectives of the envisaged measures were in line with and complementary to the objectives of the existing actions of Swiss IBM.

Examples of coordinating mechanisms to ensure the Fund's complementarity with national interventions

In **Austria** a separate unit within the EU department of the Ministry of the Interior (BM.I) was responsible for coordinating all EU funding instruments at the BM.I including the avoidance of potential double-funding. Furthermore, the templates for project proposals and monitoring and reporting included questions specifically aimed at preventing double-funding. In **Bulgaria** and **Finland** the ISF Monitoring Committee was indicated as responsible for ensuring the coordination between the relevant EU and national financing instruments. During the regular meetings, representatives from the relevant authorities could discuss ISF-BV projects detecting any possible synergies and complementarities with projects financed through national resources. In **Hungary** the Ministry of Interior (MoI) plays a significant role in preventing any overlapping and double financing with the national budget. The MoI also leads the Border Control Inter-ministerial Working Group which should ensure the harmonisation of all the developments at the borders which are co-financed by the EU or national funds; In **Iceland** and **Slovakia** the responsible authority is responsible for ensuring complementarity between co-financing from ISF-BV and other sources of funding at national and international level to foster synergies with national investments. In **Italy** a monitoring and evaluation information system (containing the data of ISF and national operational programmes) was used to detect possible duplication of projects from different financial instruments and to generate alerts automatically.

5.6 What is the EU added value of ISF-BV so far?

This question aims to assess the value that results from ISF-BV that is additional to the value that could result from interventions which would have been achieved by Member States at national level.

In a nutshell

The Fund ensured EU added value through innovative investments in infrastructure and equipment. It supported cooperation between Member States. Training activities enabled by the Fund contributed to harmonising practices between Member States. A higher EU added value could have been expected in areas of consular cooperation, cooperation with third countries and IT systems.

Shared management

The interim evaluation collected evidence on the added value of the projects supported by the Fund. Stakeholders[207] agree that the Fund has strongly contributed to ensuring a high level of security in the EU, supporting the adoption of a **harmonised approach to visa processing** as well as the establishment of IBM. The Fund acts as a catalyst, enabling, supporting, and **stimulating innovations** that are taken up at national level, in terms of infrastructure, equipment and systems,

[207] Interviews with Member States RAs (BE, BG, EL, FR, NL, NO, PL and SI). Information was also gathered through questionnaires on the funding priorities in the Commission policy areas for the MFF post-2020 circulated by the Commission to the responsible authority for preparing the AMIF and ISF Committee on 13 March 2017.

new operational techniques, and working methods[208]. In this respect, the actions considered as bringing higher EU added value are the ones supporting the national capacity, both in the areas of visa and borders[209].

The uniform deployment of up-to-date **IT systems** by all Member States appears to be key to fully achieving a common visa policy and IBM. Since large-scale IT systems need huge investments, it is likely that, without an EU intervention, national IT systems would have continued to be diverse, thus affecting the EU's capacity to achieve the overall objectives in the border and visa policy field. In this view, the Fund added value to national efforts by allocating some resources specifically for this purpose and by pushing all Member States in implementing similar systems in line with EU standards, thus easing the exchange of information and increasing the EU's security levels. In the field of visa, the use of new technologies added value in terms of efficiency in processing visas, improving the exchange of data and information within and between Member States[210]. In the field of borders, the EU added value resulted in interoperable modern technologies being developed, which improved the efficiency and speed of the Schengen Information System and Visa Information System. This promoted interconnection with the Schengen partners, which contributed to strengthening border checks and monitoring[211]. Actions related to IT systems were usually complemented by actions funded by the **operating support**[212], which focused on the upgrading, developing and maintaining ITC equipment used to support both visa issuing and border management[213].

Moreover, the Fund contributed to improved **cooperation among the different actors** involved at different levels (EU, national, projects level), therefore enabling the strengthening of Member States capacities and users awareness as well as the improvement of the quality of services[214]. In light of this, stakeholders found that consular cooperation brings EU added value[215], by:

- setting up and developing common application centres;
- purchasing equipment for consular offices including hardware equipment for the functioning of national Visa Information System and its connection to central Visa Information System;
- repairing/refurbishing consular offices;
- deploying consular officers; and
- implementing technological infrastructure.

The Fund has also strengthened information sharing and collaboration mechanisms. It has also enabled synergies on security issues between Member States[216].

According to some Member States[217], EU added value was related to the Fund's capacity to strengthen **solidarity and responsibility**, by boosting cooperation under EUROSUR and with Frontex.

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208 responsible authority responding to the questionnaires for the MFF post-2020: BE, BG, FR, IT, NL and PL; Interview with CIES Onlus (Italian EMAS beneficiary). 45% of replies to the online survey.

209 responsible authority responding to the questionnaires for the MFF post-2020: AT, CH, CY, EE, ES, FI, HU, IT, LU, PL, SE, SI and SK.

210 20 Member States (AT, BE, BG, CY, CZ, DE, DK, EE, FI, FR, EL, HU, IT, LV, LT, PT, RO, SE, SI and SK). 5 interviews: 4 RAs (EL, NO, BE and FR) and one delegated authority (EL). OPC: 3 Public Authorities (BG, EL and IT).

211 6 Member States (AT, CZ, DE, EE, FR and LV). Interview with FR responsible authority.

212 ES and SI.

213 RAs that responded to the questionnaires for the MFF post-2020: CH, ES, FI, IT and SI.

214 Member States: BE, DE, EE, EL, ES, HR, HU, LU, LV, NL, PL and PT. 45% of replies to the online survey.

215 responsible authority responding to the questionnaires for the MFF post-2020: HU, LT, RO and SK.

216 Member States: BE, CY, DE, EL, ES, FI, HR, LU, LV, NL, PL, RO and SK.

217 4 Member States (AT, BE, CZ and PL).

From a financial perspective, the Fund enabled projects with a **high volume of investments** to be implemented that would have not been possible under national budgets. Without the support of ISF-BV (i) the scope of actions would have not been the same, (ii) the quality could have been compromised given the high standards required for EU-funded projects, and (iii) there could potentially have been implementation delays and the loss of knowledgeable staff[218].

What is more, **training activities** brought EU added value since it enabled practices to be harmonised across the Member States. Concerning the field of visa, the training of personnel was aimed at supporting the implementation of the common visa policy and the correct and uniform application of the Schengen *acquis*[219]. Concerning the management of external borders, the training aimed to facilitate the sharing of information and best practices for border control to improve the effectiveness of the border checks[220].

To conclude, it is worth mentioning some areas where a higher EU added value might be expected in light of the Fund's objectives and related EU commitment. In particular, **consular cooperation** represents the second national objective in terms of EU commitment (10 %, with a total amount of EUR 14.8 million). However, Member States included few consular cooperation activities in their national programmes, showing a low interest towards this objective. Similar considerations apply to **Member States cooperation with third countries**, as only a few Member States[221] implemented actions pursuing this objective and most stakeholders considered the Fund's contribution quite limited. Finally, despite the results achieved in terms of setting up and running **IT systems**, some Member States[222] reported that better results would be achieved if the EU financing was higher. Additional EU resources would have ensured better IT systems development as well as systems interoperability.

Direct management

The analysis of data showed that, without the resources provided by the Fund under EMAS, **the use of national funding only would have resulted in a more difficult and smaller scale implementation of actions with a lower impact overall**. EU added value of EMAS can be seen in innovative solutions proposed[223], and the effective, timely, and efficient handling of migration flows, the crisis, and emerging needs. The EMAS measures have contributed to (i) a closer cooperation and collaboration across Member States, (ii) improved coordination of relevant stakeholders at local and national level and (iii) improved synergies between public institutions and the private sector.

As for the few action grants awarded under UAs, their implementation is at a very early stage. Therefore no conclusions can be drawn for the interim evaluation.

Indirect management

The Fund allocated some resources to specific bodies and institutions which allowed them to extend the scope of their activities by complementing Commission and national actions requiring a high

218 Member States: AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI and SK.

219 responsible authority responding to the questionnaires for the MFF post-2020: AT, CY, EE, HU, LT, SI and SK.

220 responsible authority responding to the questionnaires for the MFF post-2020: CY, LT and SK.

221 4 Member States (AT, ES, IS and LT) declared to have implemented projects, without providing any detail/further information.

222 Ref. Ares(2017)2412067, 'High-level expert group on information systems and interoperability - Final report' (May 2017. 13 Member States (AT, CH, CY, ES, FI, HU, IT, LT, LU, PL, RO, SE and SK).

223 As also supported by the online survey: 71% (n=22) of respondents chose the options '3 – moderate extent' and '4 – high extent' to the survey question 'To what extent do you think that Union Actions allowed for innovative solutions?'.

level of expertise and knowledge. This mechanism provided **EU added value by strengthening existing synergies between stakeholders at different levels** (international, EU, Member States), therefore developing a coherent EU response to emerging challenges.

Three actions have been implemented under indirect management so far. The Commission entrusted eu-LISA to carry out the 'Smart Borders Pilot' testing phase, in the context of a 'Proof of Concept' exercise, as regards the Smart Borders Package adopted by the Commission on 28 February 2013. Overall, over a period of 7 months, eu-LISA successfully carried out 78 testing activities for both automated and manual border controls, covering different environments, and finally provided a significant evidence base to assert the feasibility of systems and processes proposed for Smart Borders. The Fund allowed eu-LISA to improve the relationship with several subjects: (i) Member States, by coordinating and supervising their activities; (ii) the Commission and the European Parliament, through continuous communication and reporting activities; (iii) other EU institutions and agencies (i.e. European Data Protection Supervisor, the Fundamental Rights Agency and Frontex), involved in both the preparation and execution phases.

The Commission entrusted the ICMPD to implement the action 'Mobility Partnership Facility' (MPF). The MPF contributed to operationalising the EU GAMM and improving the EU's discussion and cooperation with partner countries, in the area of migration and mobility, providing them with targeted, flexible and tailor-made assistance. Preliminary results showed that the MPF allowed Member States and partner countries to implement their priorities according to: (i) flexible deadlines; (ii) simple procedures (i.e. user-friendly grant agreements, 15-day long evaluation process); and (iii) a significant co-financing rate, up to 95 %. The MPF contributed to strengthening partner countries' capacities, improving the levels of information and knowledge to critically review ongoing activities and policy processes.

Furthermore, the Commission entrusted the UNHCR to implement the action 'Support to Greece for the development of the hotspot/relocation scheme as well as for developing asylum reception capacity'. This action helped to create 20 000 reception places and supported relocation processes, easing the deployment of UNHCR expertise and technical staff. UNHCR staff also supported the Greek Ministry of Interior in managing and coordinating the sites as well as the Reception and Identification Service. The action improved the capacities of several national stakeholders involved in implementing referred processes, as well as the cooperation and coordination mechanisms between them.

5.7 How sustainable are the actions implemented under ISF-BV so far?

Evidence collected suggests that the project outputs are able to continue after the EU support is over both for shared, direct and indirect management.

In a nutshell

The sustainability of actions funded by ISF-BV relies on the continuity of EU funding with the national funding. This appears to be insufficient to ensure the same level of investments. Training activities play an important role in ensuring the sustainability of actions in the long term.

Shared & direct management

The EBF *ex post* evaluation[224] concluded that overall the actions in the 2011-2013 period were sustainable, as most of the assets acquired and knowledge generated were still being used while the evaluation was conducted (2016). The evaluation recommended that the following components be introduced in order to further improve sustainability of actions:

- sustainability indicators to be part of the approval process at project and annual programme level;
- compulsory *ex ante* assessments of investments requiring significant maintenance and operating costs with commitment from beneficiaries to secure the estimated post-acquisition costs; and
- procurement process to include provisions on the length of warranty, maintenance, and training if appropriate.

The ISF-BV embraced some of the recommendations from the EBF *ex post* evaluation. Sustainability indicators were not included among the common indicators provided by Regulation (EU) No 515/2014 and 22[225] out of 30 Member States[226] did not include any specific reference to sustainability in the national programmes. Common indicators were eventually introduced by Commission Delegated Regulation (EU) 2017/207[227]. Only five Member States committed to the sustainability of the implemented projects[228]. There is no evidence of specific provisions or mandatory requirements either for the *ex ante* assessment of investment or for the length of warranty, maintenance, and training.

However, beyond the issues related to the EBF *ex post* evaluation's conclusion, the interim evaluation of ISF-BV highlighted evidence of the sustainability of the Fund's results. 22 out of 30 Member States stated that the ISF-BV actions are long-term actions by their nature, since they are generally designed and structured to remain operational after the Fund's support ends. In particular, **investments in infrastructure**, facilities, and IT systems have relatively high sustainability, as they usually require smaller maintenance costs compared to the initial investments. Even if not explicitly referring to sustainability, the Fund — particularly operating support resources — was used for maintaining the equipment purchased, aiming to ensure the proper functioning of infrastructure and to give continuity to the activities[229]. The sustainability of actions is also ensured through **training** sessions, information-sharing, and cooperation mechanisms that helped to improve expertise, knowledge, and the qualifications of staff involved in managing and implementing projects[230]. Furthermore, the effects achieved through the Fund's support are also expected to continue after the EU funding, relying on national budgets to ensure the continuity of interventions and related impacts[231].

Examples of Member States reporting on project sustainability during the programming phase

Estonia planned the purchase of an additional central station and of the infrastructure supporting it to ensure the sustainability of the operative radio communication network, making border control more

224 Optimity Advisors and CSD (2016). *Ex post* evaluation of the External Borders Fund 2011-2013.

225 National programmes: AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI and SK.

226 National programmes are not available for IS, LI and NO.

227 Example of sustainability indicator: number of equipment in use 2 years after their acquisition/number of equipment acquired under the Fund (> than EUR 10 000).

228 National programmes: EE, LT, LV, MT and SK.

229 National programmes: all countries except Switzerland and the Netherlands. Interviews: 5 RAs (BE, BG, CH, LT and PL).

230 Member States: BE, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LU, MT and RO. Interviews: 3 RAs (BE, El and LT) and I delegated authority (EL). 1 beneficiary responding to the online survey.

231 Member States: BE, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LU, MT and RO.

effective. Moreover, attention is devoted to sustaining the activities involving the Immigration Liaison Officers (ILOs) in order to maintain the established connections in third countries (e.g. in Ukraine); **Lithuania** expressed its commitment to maintaining the border surveillance systems through national resources. It aims to ensure the disaster recovery and business continuity plan is implemented[232], as well as the back-up components of the national Schengen Information System II; **Latvia** expected to have a reliable, modern and sustainable national entry/exit system; **Malta** in its Manual of Procedures for the Asylum, Migration and Integration Fund and Internal Security Fund 2014-2020, sustainability of projects is directly mentioned in the subtitle '*Sustainable Management of Internal Security and Migration Flows*'[233], making it a compulsory requirement to include the text in the publications concerning AMIF/ISF. In **Slovakia** authorities involved in the ISF-BV management have to regularly check the staff expertise so as to be prepared in case of changes in the operational environment. There is often the need for specific training (including language trainings) to upgrade staff skills, ensuring the sustainability and continuity of the achieved high-level performance.

Examples of measures to ensure sustainability

Austria, **Belgium** and **Cyprus**, during the programming stage, included project beneficiaries in the public policy dialogue as well as in the negotiation process, with the aim of identifying potential investments, the impact of which was likely to produce significant results, at EU and national levels, beyond the Fund's support[234]. **Bulgaria** sets strict sustainability requirements in its eligibility rules to apply for projects. Beneficiaries have to guarantee that they will also maintain the projects through national funding after the ISF-BV fund is finished. Sustainability requirements depend on the type of equipment purchased: IT systems should be used for at least 3 years whereas helicopters, vessels, and buildings should be in use for almost 10 years[235]. In **Malta** beneficiaries are obliged to sign a declaration that ensures that the investments will be operational after the Fund's support ends[236]. In **Poland**, beneficiaries have to demonstrate significant long-term sustainability, declaring the annual cost for the project maintenance and their commitment in assuring it. The sustainability of the projects is measured by the Delegated Authority after the project is completed[237]. **Switzerland** requires beneficiaries to use the infrastructure they purchase for at least 3 years[238].

As for shared management, the sustainability of investments under direct and indirect management is also ensured by other funding schemes. In particular, under direct management it is ensured by referring to other EU Funds (i.e. AMIF), national, and other donor's resources as well as by the exchange of good practices and know-how among actors and other Member States. Under indirect management, the sustainability of investments is ensured by the commitment of resources under Member States national budgets as well as the exchange of good practice and know-how.

6. CONCLUSIONS AND ISSUES FOR FURTHER CONSIDERATION

6.1 Effectiveness

232 Measures that ensure the continuity of the project in case of unexpected events.
233 Ministry for European Affairs and Implementation of the Electoral Manifesto (2015). Asylum, Migration and Integration Fund and Internal Security Fund 2014–2020: manual of procedures.
234 Member States: AT, BE and CY.
235 Interview with Bulgarian responsible authority.
236 Member States: MT.
237 Interview with PL responsible authority.
238 Interview with CH responsible authority.

Concerning the common **visa policy**, the Fund is considered mainly effective. The Fund helped to facilitate legitimate travel, boosting Members States' capacities to verify the authenticity of documents used for visa applications, to develop information system for coordinating visa applications and procuring security equipment for consular representations in third countries. The Fund's contribution towards consular cooperation was limited in many Member States due to the delays in starting the implementation. Training courses targeted consular officials, police, and border guard officials engaged in developing and implementing the common visa policy. The EU's *acquis* on visa has been supported either through mixed projects that also pursue other objectives, or through projects specifically targeted to this objective. The development of a common visa policy was also supported through the establishment and operation of IT systems, particularly regarding the national Visa Information System. The operating support for visa measures also proved to be extremely useful for covering those staff costs and other running costs related to implementing the EU's common visa policy. Only a few Member States have used the Fund to strengthen their cooperation with third countries. However, the Fund allowed some Member States multiple postings of temporary liaison officers and visa experts to consulates in the third countries and therefore improved the detection of fraudulent documents. The existence of different national rules for implementing the Fund was a factor that hindered joint projects between Member States.

As regards the area of integrated **border management**, the Fund is considered mainly effective in the context of the security and migration crisis. By boosting the border management capacity at the EU's external borders, the Fund contributed to safeguarding the free movement of people within the Schengen area. The Fund contributed towards the effectiveness of external border controls by supporting measures focused on purchasing, modernising, upgrading and replacing border control and surveillance equipment. Border management capacity was addressed through the introduction of Automated Border Control (ABC) gates. Training activities co-financed by the Fund contributed to the implementation of the EU's *acquis* that aims to improve staff awareness and competencies on border management and on using related IT information systems. These training activities also improved the linguistic skills of the staff responsible for border management. The cooperation facilitated by the Fund between Member States and between Member States and Frontex, including purchases of equipment to be used in Frontex operations with the Fund's help, contributed to solidarity and responsibility sharing. The Fund played also a significant role in developing EUROSUR[239] by co-financing activities both under national programmes and UAs with the objective of improving situational awareness and increasing the reaction capability at the external borders. However, limited progress was registered regarding promoting the development, implementation and enforcement of policies with a view of ensuring the absence of any controls on persons, whatever their nationality. Currently, the Fund is not supporting Member States in the application of the non-refoulement principle.

Regarding **direct management**, it is very difficult to draw any conclusions on the effectiveness of the action grants awarded under UAs or EMAS since very few actions have been completed in the period covered by the interim evaluation. While EMAS measures proved to be an efficient instrument to rapidly address a number of emergency situations arising from the migration crisis, action grants under UAs proved to less popular. Member States expressed limited interest in them with few proposals received to the calls published by the Commission.

Issues for future consideration:

- The current structure of the Fund divided into external borders and visa should be maintained.

[239] Regulation (EU) No 1052/2013 of the European Parliament and of the Council of 22 October 2013 establishing the European Border Surveillance System (EUROSUR).

- The possibility of using emergency assistance is crucial and also ensures the Fund's responsiveness and relevance in changing circumstances.

6.2 Efficiency

The implementation of the national programmes started very slowly creating challenges for evaluating the Fund's cost-effectiveness because the majority of the projects are still ongoing. Low levels of human resources costs were associated with the pace of implementation of the national programmes in the Member States. Overall, human resources at EU and national level show a growing or stable number of FTEs over the years from 2014 to 2017, despite the large increase in value of the EMAS and the emergency situation on the ground following the migration crisis.

Efficiency was ensured by means of considerable knowledge and expertise gained through experience from previous projects and the flexibility of the national programmes. Furthermore national measures concerning the application, implementation, monitoring and reporting processes have been put in place in some Member States to ensure efficiency. As for the anti-fraud measures, they are generally considered as appropriate and effective.

There are also a number of issues at Member States level that Member States deem as negatively affecting efficiency and these are: (i) requirement to allocate minimum percentages among national objectives, (ii) complex and recurrent reports, (iii) common indicators and (iv) alignment of monitoring calendars.

Overall, direct and indirect management actions were deemed reasonable in terms of financial and human resources.

Issues for future consideration:

- The common monitoring and evaluation framework with relevant indicators should be established at the beginning of the programming period addressing for example reporting requirements.
- The framework for jointly implemented projects, for example, in the area of common consular cooperation should be better refined, addressing, for example, eligibility rules.

6.3 Simplification of management procedures and reduction of administrative burden

Overall, the ISF-BV ensured clear progress was made towards simplifying procedures especially regarding the programming phase. Stakeholders highlighted that multiannual programming enabled emerging needs to be addressed throughout the seven-year timeframe and large investments to be managed in the long term. This contributed to a reduction of administrative burden raised by the annual implementation cycle. Administrative simplification also came from the introduction of the simplified cost options, and particularly the flat rate calculation used with indirect costs, as well as from the digitalisation of reporting and communication procedures.

However, the administrative burden is still perceived as high, as regards both the administrations responsible for managing the funds and beneficiaries. The Common Monitoring and Evaluation Framework was established too late, well after the projects had started. Monitoring, reporting, and verification measures are still perceived as burdensome and Member States ask for clearer and more detailed guidance to ease compliance with Commission requirements. Further guidance is also

needed to ensure a common definition of the simplified cost options that is perceived as positive but is still not clear to beneficiaries, making them reluctant to use it.

As regards direct management, procedures showed to be suitable, clear, and transparent and do not create additional burden to Member States or beneficiaries.

Issues for future consideration:

- The common monitoring and evaluation framework with relevant indicators should be established at the beginning of the programming period simplifying the processes and calendars.

6.4 Relevance

The priorities and objectives set by Regulation (EU) 515/2014 as well as those within the annual work programme of both EMAS and Union actions have proven to still be relevant and aligned to current needs and problems. The types of needs identified during the programming stage did not change significantly during the Fund's implementation and no new need or priority emerged that was not properly covered by the Fund. The main mechanisms identified to ensure the Fund's relevance included (i) the policy dialogue and the consultative method adopted during the programming stage, (ii) the monitoring role played by both the responsible authority and by the Monitoring Committee, (iii) the possibility to make budgetary adjustments and transfers, and (iv) the mid-term review of the national programmes.

The interim evaluation also shows that the Fund's scope is sufficiently broad to enable the implementation of the necessary actions in the areas of external border management and the common policy on visa.

Despite the evidence gathered on the Fund's relevance, it has been noted that more flexibility would be needed as far as the national programmes' implementation is concerned. The main issue was found around the fragmentation of actions under multiple national objectives that prevented resources being pooled around key priorities making the implementation of cross-objective projects difficult. This has also led to an increased administrative burden as the Member States are required to report on the implementation of cross-objective actions for each national objective concerned with the action's specific scope.

Issues for future consideration:

- The Fund's scope, which allows flexibility, should be maintained.
- The fragmentation of national programmes under several objectives with minimum percentages of funding should be reconsidered in order to increase flexibility.

6.5 Coherence and complementarity

Most assessments of other EU interventions carried out by Member States have taken place at the programming stage in order to ensure coherence and complementarity with them. Most Member States have also adopted different coordinating mechanisms at the implementation stage to ensure coherence and complementarity with similar interventions carried out under other EU funds. These mechanisms include interinstitutional exchange of information and cooperation among authorities responsible for different EU funds and specific institutional arrangements to boost their coordination and synergies. No overlapping has been found between the ISF-BV and national interventions in the field of visa and borders. The design of the national programmes was based on a thorough policy dialogue between the Commission and the Member States, taking account of key

needs and priorities as reported at the national level. Also, it has been claimed that the Monitoring Committee and the Responsible Authority play a pivotal role in ensuring synergies and avoiding overlaps between the ISF-BV and other EU instruments. They did this through regular cooperation with other national institutions implementing other funds (incl. EU funds) and with counterparts in other Member States to avoid any overlaps and double-funding.

As regards **direct management**, both EMAS and UAs show they are coherent with and complementary to actions supported by other EU funds, actions supported by EU Agencies, and other EMAS actions funded under the ISF-BV. No issues of overlapping between the ISF-BV's direct management instruments and other relevant national interventions have been found. EMAS actions generally improve and complete interventions planned at national level and allow for actions to be implemented on a larger scale.

Issues for future consideration:

- As coherence and complementarity were ensured at the programming stage, in future coordination should be intensified during implementation in order to ensure even better coherence and complementarity between different types of actions.
- The complementarity of emergency assistance with respective national programmes and other EU programmes should be ensured from the start.

6.6 EU Added Value

The Fund's increased cooperation among actors dealing with visa processing and border management across the EU, improving the sharing of information and practices and contributing to their harmonisation at the EU level. Furthermore, the Fund bolstered the interconnection of national IT and information systems, both among the Member States and with EU systems. Training proved to be a relevant mechanism to ensure the Fund's EU added value since it supported a common understanding of visa and border issues and related management. Operating support allowed the Member States to finance daily tasks and regular operating costs (i.e. staff, maintenance, repair costs) on both border and visa management.

From a financial point of view, without a dedicated EU funding instrument in the areas covered by ISF-BV, national funding would not have allowed the effective and efficient funding of the actions planned. Actions would have been implemented with much more difficulty. They would not have been implemented on the scale nor in the timeframe planned due to insufficient national resources.

A higher EU added value could have been expected in areas of consular cooperation, cooperation with third countries and IT systems, especially in light of the Fund's objectives and related EU commitment.

As regards direct management, without the resources provided by EMAS and UAs, national funding on its own would have resulted in a much more difficult and smaller scale implementation, with a lower general impact. The Fund's main advantages entailed by these measures included higher cooperation both across and within Member States, including the sharing of information, know-how and good practices as well as better private-public collaboration. This allowed for a prompt and efficient handling of migration flows and related emergencies.

Actions funded under indirect management consisted of allocating some resources to specific bodies and institutions, which allowed them to extend the scope of their activities by complementing Commission and national actions requiring a high level of expertise and knowledge.

This mechanism provided EU added value by strengthening existing synergies between stakeholders at different levels (international, EU, Member States) and therefore developing a coherent EU response to emerging challenges.

Issues for future consideration:

- Support through ISF-BV and all its instruments should be continued which would send a clear message on the importance of solidarity and cooperation between Member States in order to manage the EU's external borders effectively.

6.7 Sustainability

The majority of Member States did not report any evidence on the sustainability of projects. Some Member States reported that they took care of sustainability in the programming stage, by requesting beneficiaries to demonstrate their commitment to maintaining the projects even after the ISF. According to the national evaluation reports, only five Member States committed to the sustainability of the implemented actions.

Many ISF-BV actions are long-term actions by their nature, since they are generally designed to remain operational beyond the Fund's support (investments in infrastructure, facilities, and IT systems). ISF-BV-funded training sessions and cooperation mechanisms contributed to the sustainability of actions through improving expertise, knowledge, and the qualifications of staff involved in managing and implementing projects. In conclusion, the effects achieved through the Fund's support are also expected to continue after the Fund has finished, relying greatly on future EU funding and also national budgets to ensure the continuity of interventions and related impacts.

Under direct and indirect management, sustainability of actions depends on complementary EU, national or other donor funding.

Issues for future consideration:

- Sustainability, in terms of both financial sustainability and the effects of sustainability, should be taken into account at the project design and selection stage.
- Disseminating information and supporting the uptake of good practices by other projects should further improve sustainability.

ANNEX 1: PROCEDURAL INFORMATION

Leading Directorate-General	the Commission
Participating units of the Commission	A2 — Legal Affairs B2 — Visa Policy and document security B3 — Information Systems for Borders and Security C2 — Border Management and Schengen E1 — Union Actions E2 — National programmes for south and east Europe, evaluation, AMF/ISF Committee E3 — National programmes for north and west Europe, budget, MFF, agencies
Participating DGs in ISSG	Secretariat-General DG BUDG DG JUST DG TAXUD
Legal base	According to Art. 57 of Regulation (EU) No 514/2014, the Commission shall submit to the European Parliament, to the Council, to the European Economic and Social Committee and to the Committee of the Regions an interim evaluation report of ISF-BV at the level of the Union by 30 June 2018.
Roadmap approval	11 April 2017
Decide planning	PLAN/2017/891
Exceptions to the Better Regulation guidelines	None noted
External consulting firm specialised in evaluation	Contract signed on 19 September 2017 with a consortium of: – Ernst & Young Special Business Services (lead partner), BE; – Centre for International Legal Cooperation, NL; – Rand Europa Community Interest Company, UK.
Number of inter-service steering group meetings	4 meetings as (last on: 8 March 2018)
Last deliverable handed in	12 March 2018 (Final report for acceptance)
Approval of the final report by Steering Group	
Regulatory Scrutiny Board (RSB) meeting	11 April 2018
Resubmission of the SWD to the RSB	

ANNEX 2: STAKEHOLDER CONSULTATION

ISF-BV had a consultation strategy whose objective was to gather input from stakeholders (evidence, data, as well as views and opinions) and ensure that all of them have the opportunity to present their views to the Commission on how well the existing programmes have performed and the extent to which they met the EU's objectives in these areas. Stakeholders' input was sought to provide the Commission with valuable insights on how well the current funds are performing, including on the challenges related to the implementation.

The Commission services have worked on the future multiannual financial framework in clusters setting up a streamlined consultation that covered both forward and backward looking questions on the programmes. This open consultation, as provided for in the Better Regulation guidelines and the interim evaluation's consultation strategy, was meant for the general public and was published for 8 weeks on the Commission's portal[240]. 350 answers and 52 position papers have been received in this context. No separate, specific open consultation for the mid-term evaluation was carried out. Launching a specific consultation for the mid-term evaluations could have created confusion and not provided much added value compared to the broader exercise.

Instead, a targeted consultation specific for the mid-term evaluation was carried-out, which eventually was used to contextualise the findings. The questionnaires were aimed at the beneficiaries of Union actions and EMAS and were made available in English, French and German. This consultation only received input from 4 participants.

The results of this **targeted consultation** are reproduced below:

- Of the 4 answers received, half (2) were from individuals answering in their professional capacity and half (2) from respondents answering on behalf of their organisations. All 4 of these were from national public authorities and have declared knowing very well ISF-BV because they have benefitted from its funding.
- The first part of the consultation concerned the importance of the specific objectives of ISF-BV for the policy priorities in the Member States (absence of controls at internal borders, checks at external borders, integrated management system for the external borders, better consular cooperation on visa issuance, IT systems, situational awareness, Union aquis, copperation of Member States in third countries and with third countries). The answers received are overwhelmingly consider very important the ISF-BV objectives.
- The second part of the consultation concerned the extent at which the actions financed by ISF-BV in the Member States contribute to the Fund's objectives (absence of controls at internal borders, checks at external borders, integrated management system for the external borders, better consular cooperation on visa issuance, IT systems, situational awareness, Union aquis, copperation of Member States in third countries and with third countries). The vast majority of answers consider that ISF-BV funded projects do contribute to the development of the Fund's objectives (either to a great extent or fully). Only one participant did not know how to answer in the following cases: absence of controls at internal borders, IT systems, copperation of Member States in third countries and with third countries. Half of the participants (2) did not know how to answer to the question regarding better consular cooperation on visa issuance.
- All respondents consider ISF-BV being able to address new and emerging needs and having a positive influence on how Member States work with border management and Schengen visa processing.
- Regarding the cooperation among Member States, respondents consider that ISF-BV's contribution was positive in the area of borde management (4), and Schengen visa processing (2).
- Regarding whether the EU policies would have been implemented without the support of ISF-BV,

[240] http://ec.europa.eu/info/consultations_en

respondents are divided with half (2) considering it mostly likely in the area of border management and half (2) unlikely, while the majority (3) considered likely in the area of Schengen visa processing.

- Looking at ISF-BV so far, respondents did not know whether the Fund promotes new actions that were not delivered in the Member States before in the area of borde management (2) and Schengen visa processing (4 out of 4).
- All respondents think that ISF-BV funded projects help beneficiaries to better support border management, better protect external borders, better ensure the smooth crossing of borders, better tackle illegal immigration and better facilitate the travel of third-country nationals.
- Respondents were divided in who considered ISF-BV generally easier or much easier (3) to implement compared to the previous programming period (SOLID) and who found it generally harder (1).
- In what concerns the degree at which actions financed by ISF-BV are coherent with actions and projects funded by national resources, all respondents were positive (4) in the field of border management and half of them were positive in the field of Schengen visa processing (2) with the other halh not being able to answer.
- Regarding sustainability, respondents were divided into those who believe actions would continue at least partially also in the absence of the EU financial support (2) and those who did not know whether this would have happened (2). The same proportion was then reproduced regarding the achievement of the objectives in the absence of ISF-BV – 2 who consider that these could have been achieved and 2 who believe it would have not been possible.
- This targeted consultation has complemented the interviews and an online consultation run in parallel by the consultant, and the table below provides an overview of the response rate to this latter. The results of all those consultations have been used to answer and contextualise the answers to the evaluation questions.
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This targeted consultation has complemented the interviews and an online consultation run in parallel by the consultant, and the table below provides an overview of the response rate to this latter. The results of all those consultations have been used to answer and contextualise the answers to the evaluation questions.

Table 8: Overview of consultant's online survey respondents

	N. Sent	Discarded	N. Completed
Monitoring Committees	167	16	26
Ministry of Foreign Affairs	12	0	1
responsible authority and delegated authority	21	5	4
audit authority	32	4	2
EMAS beneficiaries/coordinator	42	1	4
UAs beneficiaries/coordinators	3	0	0
Multiannual programme beneficiaries	110	2	17
Experts	9	5	1
Total	**396**	**33**	**55**

Source: ISF-BV Interim evaluation by EY

In addition to this, the evaluation reflected the results of a **forward-looking workshop** with representatives of responsible authorities and the Member States evaluators. Its results are presented below:

Participants: two representatives of the COM, three representatives of EY (EY, service provider

for the Interim Evaluation of the ISF-BV 2014-2017), representatives of nine Member States and two Schengen Associated Countries.
Date: 30th November 2017.

Contribution of the ISF-BV to the harmonisation of visa processing/issuing and to the effective implementation of an integrated border management

Visa processing

- The Fund contributes to the establishment of an information-based decision-making, to the development of instruments (an APP, in particular) that provide relevant information, and enable sharing information with other MS. Visa application procedures have been externalised to a specific Agency, managed under the national budget.
- The Fund contributes to the delivery of training in foreign missions. Ministries of Foreign Affairs have outsourced visa issuance service. The impact of training is hardly quantifiable, and the available indicators are not fitting for purpose. In general, however, trainings have been positively evaluated and staff's skills have upgraded.
- Some MS have not implemented any projects under this objective, but they are still interested in putting in place some actions. They regret the limited capacity of beneficiaries to draft projects.
- The main contribution of the Fund is the operating support, above all for the maintenance of VIS. Despite the clear contribution of the Fund, there are issues concerning national capacity that affect the Fund's success. Embassies struggle to: i) design and manage projects under the National Programme (above all on security issues); ii) manage EU funding - since they do not have the skills to manage the financial implementation.
- The main contribution of the Fund is the possibility to finance IT projects (VIS) and projects concerning the deployment of visa experts for regional training in third countries. These are important to implement Union's standards and to keep the staff up-to-date. The visa application service has been externalised. A project for the development of consulates not approved yet, was considered too risky in terms of sustainability, due to constant changes.
- Projects concerning: i) training on visa application for consular officials, visa specialists, internal staff and for third countries representatives (located in third countries); ii) IT projects for visa management (i.e. purchase of fingerprint scanners, renewal of computers to process Schengen Visas).
- Projects with different scope (i.e training, deployment of DVO). However, some externalities are causing delays.

Implementation of integrated border management

- Projects concerning the establishment of ABC gates and the deployment of ILOs, considering both relevant eligible actions.
- Projects concerning the deployment of ILOs, the purchase of equipment, and the development of smart borders. ISF-BV also supports cooperation measures with third countries.
- Since MS are required to comply with EU standard in the area of border management, the contribution of the Fund has been mainly in the development of IT systems (i.e. SIS, ETIAS) - for better collecting and using relevant information on border checks - smart borders mechanism and training, in compliance with EU standards.

Experience with Specific Actions on consular cooperation and the purchase of means of transport and operating equipment for the deployment during joint operations by the Frontex Agency.

- Specific Actions on consular cooperation, both as project lead and as participant, not able to assess the current added-value of such actions. Despite the large sums of money provided, there are issues of administrative burdens raising from national laws and regulations.
- Issue of lack of additional funding for the management of specific actions.

- Specific Actions for the development of Schengen Houses and CCM. Difficult to be implemented, due to externalities and challenges related to the multinational management.
- All countries agree on the fact that: i) multinational projects are difficult to be managed due to different national eligibility and implementation rules. Suggestion that COM establishes standard eligibility and expenditure rules; ii) additional funding should be provided for the management of Specific Actions; iii) Specific Actions for FRONTEX equipment are easier to be managed since they consist in procurement and purchase.

Key advantages and issues of the ISF-BV as compared to the previous fund.

- There has been huge improvement compared to the EBF. Multiannual programming allows more flexibility. However, the Fund should probably focus on fewer objectives with a broader scope, without limiting the resources to narrowly defined objectives.
- National objectives should be more focused.
- Operating support is very useful in the area of borders management. Some don't use operating support on visa issues due to difficulties in project acquisition.

Administrative burden, if any.

- Need to establish simplified procedures at Union level, also across programmes.
- All countries agree on the fact that most administrative burden derives from national rules and from heavy national procurement procedures.

Extent to which the effects of the ISF-BV actions are achieved at a reasonable cost in terms of financial and human resources deployed.

- Current costs are not effectively monitored by Responsible Authorities and COM, mainly due to administrative burden.
- Too early to draw conclusions on this, given the long duration of the projects.

Extent to which the Fund still covers needs and problems as evolved since its establishment in 2014.

- According to all countries, nothing is missing in terms of priorities, since the scope of the Fund is broad and can cover the Smart Border initiative. However, a discussion panel on border management to address mid-term review may be needed.
- Need to develop national implementation capacity, since many challenges derive from MS's lack of management capacity.
- The area of competence of beneficiaries is limited, and thus they may be less interested in implementing projects with a wider scope.

Sustainability measures.

- All countries agree that ISF-BV projects are sustainable by nature. The main issues concern:
- - the fact that staff turnover is very high and this entails the need to provide continuous training schemes. Training is a sustainable action as information and material is shared.
- - IT-related projects may be not sustainable, since technology develops fast.
- Proposal to share a booklet of good practices to improve sustainability.

Coherence and complementarity. All countries agree on the need of mapping potential overlapping and complementarity with other funds, during the designing phase of new financial instruments. However, MS are not able to do this alone and suggest that COM could start a mapping of all funding possibilities. Moreover, some countries suggest creating a network to standardise different eligible costs under different funds.

- Added- value brought about by the EU support, if any.
- According to all countries, without the support of the Fund, actions depending on year-to-year

national budget would have been financed and put in place with a smaller scale and scope, and later in time. ISF-BV stimulates a better management and acts as a good incentive to implement relevant actions (i.e. smart borders, IT systems). In some cases, the Fund helps implementing projects that bring benefits only on the long-term and thus are not a national political priority.

Main problems during or with the implementation, if any.

- Regulations have been approved too late at the EU level. Implementing regulations were actually not ready when approving some National Programmes. Some countries have set up a specialized unit on EU funding to effectively manage the allocated resources.
- Some have set up a specialised bureau of border guards with expertise in EU project management. This had a very positive impact on the Fund's implementation.
- The same staff members and beneficiaries are often engaged in overlapping issues and tasks, creating implementation delays.

Measures put in place to prevent, detect, report and follow-up on cases of fraud and other irregularities, if any.

- No country present at the workshop has put in place special methods and measures to prevent, detect, and report frauds.

ANNEX 3: COST/BENEFIT ANALYSIS

The following table analyses the costs incurred by the various actors involved in implementing ISF-BV, the target group, the beneficiaries, the national administrations and the EU. These costs vary from the administrative/indirect or compliance costs for the beneficiaries, to the administrative costs or technical assistance for the RAs, to the actual financial costs for the EU and to the human resources costs for all of the above. The analyses made were both qualitative and quantitative (including monetary analyses).

Table 11: Overview of costs associated with the ISF-BV

Target Group	
	n/a
Beneficiaries	
Admin	EMAS and UAs, as well as indirect management actions have been achieved at reasonable financial costs. Most beneficiaries of EMAS and UAs consider the overall funding and administrative costs to be appropriate, as were the number of staff involved in the implementation. The procedures applicable to EMAS and UAs are simpler and quicker compared to shared management, and they allow for prompt and suitable interventions. This is particularly relevant in the case of EMAS, since national budgets are often shown not to be adequate to cope with emergencies. In terms of allocations, most beneficiaries consider the overall funding to be adequate, also because it is possible to ask for amendments to the grant agreements. Moreover, procurement procedures represent one of the main components that ensure the efficient achievement of results, since they allow the most economical offers to be selected — complying with tender specifications, timeliness of deliveries, and other relevant factors. Direct management: EUR 414 million (planned) — EUR 271 million (allocated) — EUR 17 million (spent). Indirect management: EUR 12 million (planned) — EUR 9.5 million (allocated) — EUR 0 million (spent).
National administrations	
TA	By 31 December 2016, Member States had spent a total amount of EUR 3.7 million overall out of the total of EUR 62 million, with the payment rate at 0.13 % and an implementation rate of 6 %. The complexity and recurrence of reporting requirements entail implementation delays and administrative burden; according to several Member States, compared to the previous programming period, reporting requirements have considerably increased. TA costs and administrative costs of projects increased between 2015 and 2016, with a low decrease in 2017. According to available data (11 out of 30 Member States): 2015 EUR 1.17 million (ratio=1.16); 2016 EUR 6.78 million (ratio= 0.7); and 2017 EUR 6.68 million (ratio= 1.48).
HR	The Fund is efficient as regards the deployment of human resources. Some concerns emerged regarding the lack of knowledge, expertise, and capacity of professionals involved at national level in managing and implementing the Fund. On average, 7.08 FTEs have been involved in implementing the Fund and are paid through TA or national budgets, with remarkable differences between the different Member States. Overall, considering the average number of projects implemented by 2017 (12.84), an average of 0.55 FTEs were engaged per project. Considering the ratio FTEs (average)/ amount of the funds claimed for the financial year (average), 0.5 FTEs have been involved per EUR 1 million for the implementing ISF-BV. In this regard, there has been a significant decrease over the years, dropping from an average of 1.35 FTEs in 2014, to 0.72 in 2016, with a further decrease in 2017. On average, according to available data (11 out of 30 Member States) compared to 2016, the costs for FTEs have decreased by 0.2 % (EUR -222 198 per million); compared to 2015, the costs for FTEs have decreased by 0.3 % (EUR -854 935 per million).
European Union	
Budget Commit	The total value of ISF-BV (EUR 2 609 million), although considerable, represents a small fraction of the total EU budget. By comparison, the total value of the AMIF is considerably higher (EUR 6 888 million).
Payments	Looking into each implementation mechanism individually: shared management shows a total payment rate of 6.38 %; direct management shows a total payment rate of 6.12 % (EMAS: 5.93 %; UAs; 0.19 %); and indirect management shows a total payment rate of 81 %. Therefore, both shared and direct management do not appear to be on track to being fully used. Payments made so far amount to: shared management EUR 178 million; direct management: EUR 171 million; and indirect management: EUR 8 million.

HR	The number of FTEs dedicated to implementing the ISF (both Borders and Visa and Police) has increased over the period 2014-2017 as well as the related costs. Specifically, in 2014 144 FTEs were involved (including 22 external personnel) out of a total of 322 the Commission staff. There has been a significant increase in this figure over recent years, rising from 153 FTEs (including 26 external personnel) in 2015 (out of a total of 454 the Commission staff), to 162 (including 27 external personnel) in 2016 (out of a total of 480 the Commission staff). There was a further increase in 2017, with a total number of 187 FTEs (including 32 external personnel), out of a total of 555 the Commission staff. Total costs: EUR 68 million. Costs related to HR dedicated to implementing the ISF have increased. Specifically, in 2014 costs amounted to EUR 17.6 million (including EUR 1.6 million for external personnel). There has been a significant increase over recent years, rising from EUR 18.7 million (including EUR 2 million for external personnel) in 2015, to EUR 20 million (including EUR 2 million for external personnel) in 2016. In 2017, total costs currently stand at EUR 12 million, calculated as 50 % of total annual cost as the interim evaluation only covers the period up to 30 June 2017.

The following table analyses the benefits gained by the various actors involved in implementing ISF-BV, the target group, the beneficiaries, the national administrations and the EU. These benefits vary from intangible such as knowledge developed or capacity built to tangible such as financial support. The analyses made are both qualitative and quantitative (including monetary).

Table 12: Overview of benefits brought by ISF-BV during 2015-2017

Visa management — supports a common visa policy to (i) facilitate legitimate travel, a high quality of service to visa applicants as well as equal treatment of third-country nationals, and (ii) tackle illegal migration. Benefits: tangible (financial) and intangible (knowledge)
Target Group
Number of uniform visas issued: 13 860 218 Number of uniform Schengen visas issued at BCPs: 99 473 Number of uniform visas applied for in consulates: 15 003 765 Number of uniform visas issued in consulates: 13 760 693, which, includes the issuing of multiple entry uniform visas: 8 121 701; and of long-term visas: 95 759 Number of uniform visas not issued in consulates: 1 034 248
Beneficiaries
The Fund contributed towards the achievement of a common visa policy. It helped to facilitate legitimate travel across Europe, by co-financing projects aimed at strengthening the national capacity, ensuring the refurbishment of premises used for visa issuance and the procurement of security equipment for consular representations in third countries. The Fund helped to ensure the correct and uniform application of the EU's *acquis* on visa, indirectly through projects pursuing other objectives. Moreover, the Fund contributed to consular harmonisation through measures aimed at improving the exchange of information and practices. Specifically, the establishment and operation of IT systems, with particular regard to national Visa Information System, ensured efficient and smoother visa processing and made it possible to deal with the changing technical/legal requirements of the common visa policy, including the introduction of digital passports and related compliance checks. The development of a common visa policy was also supported through training for consular officials, police, Ministry of Interior officials and border guard officials. Number of consular cooperation activities developed with the Fund's help: 4. number of staff trained in aspects related to the common visa policy with the Fund's help: 2 240.
National administrations
Setting up of administrative structures and training for staff and relevant stakeholders Number of consulates developed or upgraded with the Fund's help: 156 Number of specialised posts in third countries (immigration liaison officers) supported by the Fund: 105 Hours of training courses in aspects related to the common visa policy with the Fund's help: 756
European Union
Support Border Management[241]**:**

[241] Section 6.3 (Section answering evaluation questions).

strengthened integrated border management;
uniform and high level of control and protection of external borders; and
smooth crossing of the external borders in conformity with the Schengen *acquis*.
Benefits: tangible (financial support to Member States authorities and provision of services to) and intangible (increased knowledge and awareness).

Target Group

Beneficiaries

The Fund contributed towards an integrated border management. Although many Member States did not implement any actions specifically aimed at abolishing all checks on people crossing internal borders, interventions co-financed by the Fund have in any case indirectly contributed to this objective. ISF-BV actions were aimed at boosting the border management capacity to prevent cross-border crime and irregular migration, through introducing Automated Border Control systems and the Public Key Directory, and using modern technical equipment for border surveillance such as (i) engineering appliances and the TETRA communication system; (ii) document verification devices; (iii) mobile scanning vehicles; (iv) mobile application for carrying out border checks and the purchasing of document readers for portable border control devices; and (v) introducing biometric data. The Fund also helped to strengthen solidarity and responsibility towards an integrated external borders management system by means of cooperation among Member States, including interventions under EUROSUR, and between Member States and Frontex. Moreover, the Fund supported the application of the EU's *acquis* by co-financing training activities and programmes, which helped to improve the technical, operational, and even linguistic skills of staff responsible for border management. In addition, the Fund supported border management through adopting interoperable modern technologies in line with EU standards.

Number of border crossings of the external borders through ABC gates supported through the Fund: 18 782 556

Number of incidents reported by Member States to the European Situational Picture: 7 104

Number of staff trained in aspects related to border management with the Fund's help: 2 760 out of the 29 678 expected by national programmes

National administrations

Setting up of administrative structures and training for staff and relevant stakeholders.

Number of border control (checks and surveillance) infrastructure and tools developed or upgraded with the Fund's help: 1 414.

Number of national border surveillance infrastructure established/further developed under EUROSUR: 4.

Number of training courses in aspects related to border management with the help of the Fund: 105 training hours — out of the 332 772 expected by national programmes.

European Union

Emergency situation — support Member States in substantiated emergency situations requiring urgent action.
Benefits: improved operational capacities; means of transport, infrastructure, operating equipment and IT systems for better border management; support to staff, maintenance and repair costs; linguistic and intercultural mediation services.

Target Group

Beneficiaries

EMAS actions are considered to be effective measures which can create positive impacts overall and enable actions to be implemented promptly and effectively in response to emergency situations. This is due to the presence of beneficiaries with high levels of competencies and expertise.

EUR 256 million (planned resources) — EUR 245 million (allocated) — EUR 165.6 million (spent). Payment rate: 5.93 %.

45 EMAS actions put in place including those aimed at:

- improving operational capacities (27);
- purchasing means of transport, infrastructure, operating equipment and IT systems for a better border management (8);
- supporting staff, maintenance and repair costs (7); and
- improving linguistic and intercultural mediation services (3).

National administrations

European Union

ANNEX 4: EVALUATION QUESTIONS

Effectiveness

How did the Internal Security Fund ('Fund') contribute to the achievement of the general objective defined in the Regulation (EU) No 515/2014?

How did the Fund contribute to the achievement of the following specific objectives: Support a common visa policy to facilitate legitimate travel; Provide a high quality of service to visa applicants; Ensure equal treatment of third-country nationals and Tackle illegal migration?

- What progress was made towards promoting the development and implementation of the common visa policy to facilitate legitimate travel, and how did the Fund contribute to achieving this progress?
- What progress was made towards ensuring better consular coverage and harmonised practices on visa issuance between Member States, and how did the Fund contribute to achieving this progress?
- What progress was made towards ensuring the application of the Union's *acquis* on visas and how did the Fund contribute to achieving this progress?
- What progress was made towards Member States' contribution to strengthening the cooperation between Member States operating in third countries as regards the flows of third-country national into the territory of Member States, including prevention and tackling of illegal immigration, as well as the cooperation with third countries, and how did the Fund contribute to achieving this progress?
- What progress was made towards supporting the common visa policy by setting up and running IT systems, their communication infrastructure and equipment, and how did the Fund contribute to achieving this progress?
- How did the operating support provided for in Article 10 of the Regulation (EU) No 515/2014 contribute to the achievement of the specific objective on common visa policy?

How did the Fund contribute to supporting integrated border management, including promoting further harmonisation of border management-related measures in accordance with common Union standards and through the sharing of information between Member States, and between Member States and the European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union? How did the Fund contribute to ensuring, on one hand, a uniform and high level of control and protection of external borders, including by tackling illegal immigration; on the other hand, the smooth crossing of the external borders in conformity with the Schengen acquis, while guaranteeing access to international protection for those needing it, in accordance with the obligations contracted by the Member States in the field of human rights, including the principle of non-refoulement?

- What progress was made towards promoting the development, implementation and enforcement of policies with a view to ensure the absence of any controls on persons when crossing the internal borders, and how did the Fund contribute to achieving this progress?
- What progress was made towards carrying out checks on persons and monitoring efficiently the crossing of external borders, and how did the Fund contribute to achieving this progress?

- What progress was made towards gradually establishing an integrated management system for external borders, based on solidarity and responsibility, and how did the Fund contribute to achieving this progress?
- What progress was made towards ensuring the application of the Union's *acquis* on border management, and how did the fund contribute to achieving this progress?
- What progress was made towards contributing to reinforcing situational awareness at the external borders and the reaction capabilities of Member States, and how did the Fund contribute to achieving this progress?
- What progress was made towards setting up and running IT systems, their communication infrastructure and equipment that support border checks and border surveillance at the external borders, and how did the Fund contribute to achieving this progress?
- How did the operating support provided for in Article 10 of the Regulation No 515/2014 contribute to the achievement of the specific objective on border management?

Efficiency

Were the results of the Fund achieved at reasonable cost?

- To what extent were the expected results of the Fund achieved at reasonable cost in terms of deployed financial and human resources?
- What measures were put in place to prevent, detect, report and follow-up on cases of fraud and other irregularities, and how did they perform?

Simplification and reduction of administrative burden

Were the management procedures of the Fund simplified and the administrative burden reduced for its beneficiaries?

- Did the innovative procedures introduced by the Fund (simplified cost option, multiannual programming, national eligibility rules, more comprehensive national programmes allowing for flexibility, operating support and Special Transit Scheme for Lithuania) lead to simplification for the beneficiaries of the Fund?

Relevance

Did the objectives of the interventions funded by the Fund correspond to the actual needs?

- Did the objectives set by Member States in their national programmes respond to identified needs?
- Which measures did Member State put in place to address changing needs?

Coherence

Were the objectives set in the national programme coherent with the ones set in other programmes funded by EU resources and applying to similar areas of work? Was the coherence ensured also during the implementation of the Fund?

- Was an assessment of other interventions with similar objectives carried out and taken into account during the programming stage?
- Were coordination mechanisms between the Fund and other interventions with similar objectives established to ensure their complementarity for the implementing period?
- Were the actions implemented through the Fund coherent with and non-contradictory to other interventions with similar objectives?
- Do the Fund's different instruments (national programmes, TA, UAs, EMAS) support each other?

Complementarity

Were the objectives set in the national programme and the corresponding implemented actions complementary to those set in the framework of other policies — in particular those pursued by the Member State?

- Was an assessment of other interventions with complementary objectives carried out and taken into account during the programming stage?
- Were coordination mechanisms between the Fund and other interventions with similar objectives established to ensure their complementarity for the implementing period?
- Were mechanisms aimed to prevent overlapping of financial instruments put in place?

EU Added Value

Was any EU added value brought about by the EU support?

- What are the main types of added value resulting from the support of the Fund (volume, scope, role, process)?
- Would the Member State have carried out the actions required to implement the EU policies in the areas supported by the Fund without its financial support?
- What would be the most likely consequences of an interruption of the support provided by the Fund?
- To which extent have actions supported by the Fund resulted in a benefit at the Union level?
- What was the EU added value of the operating support?

Sustainability

Are the positive effects of the projects supported by the Fund likely to last when its support will be over?

- What were the main measures adopted by the Member State to ensure the sustainability of the results of the projects implemented with support of the Fund (both at programming and implementation stage)?

- Were mechanisms put in place to ensure a sustainability check at programming and implementation stage?
- To what extent are the outcomes/benefits of the actions sustained by the Fund expected to continue thereafter?

What measures were adopted to ensure the continuity of the activities carried out thanks to the operating support?