



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
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Opinion

Title **DG HOME - Impact assessment on Communication on Home Affairs funding 2014-2020 and five regulations relating to the Asylum and Migration Fund and the Internal Security Fund (draft version of 3 August 2011)**

(A) Context

The Commission adopted an over-arching proposal for the next multiannual financial framework (MFF) on 29 June 2011, fixing high-level budget allocations and certain implementation choices. A series of follow-up proposals to provide a legal basis for sectoral spending programmes are currently being finalised. This Impact Assessment report will accompany several such proposals relating to the new Asylum and Migration Fund (AMF) and Internal Security Fund (ISF) for 2014-2020's programming period. To enable simplification, these two instruments will replace the 2007-2013 general programme on solidarity and management of migration flows with its European Fund for Integration of Third-Country Nationals (EIF), External Borders Fund (EBF), European Refugee Fund (ERF) and European Return Fund (RF), and also the 2007-2013 general programme on security and safeguarding liberties with specific programmes on prevention of and fight against organised crime (ISEC) and on prevention, preparedness and consequence management of terrorism and other security-related risks (CIPS). The report assesses how best to distribute home affairs funds to bring most EU added value, and also how best to manage funds, through options relating to programming under shared management, centrally managed actions and emergency response.

The IAB has focused on the policy choices not yet fixed in the MFF June package.

(B) Overall assessment

The report provides a sufficient evidence base to inform decisions. Certain elements should, however, be further improved. Firstly, the changes that will facilitate a simplification of processes should be better identified and their expected impacts should be more fully explained. Secondly, the report should better describe "external dimension" actions, justify their respective budgetary allocations and better assess their expected results. Thirdly, indicative operational objectives and indicators should be added, and monitoring plans strengthened. Fourthly, the report should clarify why two baseline type distribution options appear. Also, a glossary should be added and the text on return of migrants should be edited to ensure it is clear and avoids jargon.

(C) Main recommendations for improvements

(1) Better identify, explain and assess simplification measures. The report should more consistently identify the features of the policy-change options on shared and central management processes and emergency response that are included to facilitate a simplification of implementation processes. A brief indication should be given of any work that is planned to further develop the preferred options, for example to support greater use of flat rate and lump sum payments. In assessing impacts, the report should give stakeholders a reasonably precise indication of how the practical implementation arrangements are likely to change where possible, clarifying the methods to be used for subdividing the allocations of each Fund. Some of the tentative predictions about likely impacts on effectiveness and efficiency should be underpinned by further evidence, perhaps relating to current Home or other funds or drawn from stakeholder comments. The reasoning that underpins the predictions about administrative cost impacts should be supplied. Also, for readers' information, the report should explain how it will be ensured that Home Affairs' funds complement but do not duplicate funding directed through other EU funding instruments such as the European Social Fund and development instruments.

(2) Better describe and assess "external dimension" actions. In describing the preferred distribution option, the report should clarify what the main objectives to be pursued or actions to be funded through "external dimension" allocations are (for example, explain Mobility Partnerships for non-experts) and should justify the chosen 5/10% budgetary allocations. The relationship between these actions and activities funded by other EU funding instruments should be clarified. When assessing the likely impacts expected, the report should complement qualitative judgements with quantitative data from previous work, say about Regional Protection Programmes. It could be useful to add a brief sub-section to the assessment of preferred option 3 on overall impacts of external dimension funding, to show these more prominently than through five topic-specific paragraphs.

(3) Provide operational objectives and discuss monitoring improvements. The report should present some indicative operational objectives and some indicative indicators. These should relate to some of the activities where improvements or greater efforts are particularly desirable. It is noted that difficulties in obtaining robust data on certain home affairs outcomes such as terrorism prevention and irregular migration may require a higher than normal reliance on input and output indicators. However in light of these difficulties, the report should more fully outline plans to develop improved monitoring indicators.

(4) Clarify the reasons for presenting two baseline type options. The report should better explain why the option representing a 2007-13 type distribution of funding is not used as the reference option. This could entail adjusting its option description to state the rationale for including it, and referring back to a clarified explanation about how funding has grown which defines "backloading" and better explains its implications. To avoid duplication, less detail could be given about the 2007-13 option's impacts in comparison to the reference option in the text about it (as the reverse comparison is explained in text about the reference option). Similarly, the rationale for treating the option representing a 2013 distribution as the reference/baseline option should be briefly outlined, perhaps mentioning its relevance to experts and representation of recent political choices. In addition, for preferred option 3, the report would benefit from better indicating the allocation of resources over the different aims of the two Funds (return, integration etc.) by providing more detailed quantitative information.

Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

(D) Procedure and presentation

Stakeholder views should also be mentioned on: external dimension funding priorities, the degree of support for improvements to shared management programming, centrally managed actions and emergency response. A glossary should be added, and acronyms should be spelled out when they are first used. The current text about the return of migrants is unclear and uses a considerable amount of technical jargon, so a particular effort should be made to clarify it.

(E) IAB scrutiny process

Reference number	2011/HOME/026
External expertise used	No
Date of IAB meeting	7 September 2011