

# EUROPEAN COMMISSION Impact Assessment Board

Brussels, D(2011)

## **Opinion**

**Title** 

Impact assessment on establishing the European Border Surveillance System (EUROSUR)

(draft version of 23 September 2011)

#### (A) Context

The European Border Surveillance System (EUROSUR) is designed to enhance cooperation and information exchange between border control authorities at national and European level and in neighbouring third countries. By increasing their situational awareness and reaction capability, these authorities should be better able to combat irregular migration and cross-border crime. Work is underway on eight parallel steps that were proposed in a 2008 Communication, the "EUROSUR roadmap", which was accompanied by a previous impact assessment (COM(2008)68, SEC(2008)151). The European Council has repeatedly endorsed this initiative, including in its Conclusions of June 2011. This present impact assessment considers which operational implementation choices will best help to achieve the agreed aims.

#### (B) Overall assessment

The report provides a sufficient evidence base to inform decisions, including operational cost estimates. It should be improved to clarify certain issues and findings and to assist monitoring. Firstly, the problem drivers and the baseline scenario should be more fully described to clarify how a lack of rules hinders cooperation and how irregular migration and cross-border crime could evolve in future. Secondly, the report should provide a deeper analysis of the impacts of third country cooperation options to underpin its option choice in this regard. Thirdly, indicative monitoring indicators should be included. Fourthly, options should be scored consistently and with reference to the baseline scenario. The report should also mention the different views of stakeholders throughout, aiming to identify options that have raised concerns and to give a general impression of which options have most Member State support.

In their written communication with the Board, DG HOME agreed to revise the report in line with the recommendations in this opinion.

### (C) Main recommendations for improvements

- (1) Describe the problems and drivers more fully, and provide more context. When discussing the specific problem of insufficient cooperation, the report should be considerably clearer about how far this can be linked to a lack of harmonised requirements. It should clarify how current and planned responsibilities of national coordination centres differ between Member States. The report should also briefly outline the drivers of the general problems of irregular migration and crime/trafficking attempts, e.g. the varied push and pull factors. It should draw on this to indicate whether more or fewer attempts can be expected under the baseline scenario. The Member States and other actors most affected by the general underlying problems, and the economic and social consequences of these should be summarised, recalling the findings from the earlier impact assessment. To clarify the wider context, the report should mention the overall EU migration strategy and the role that border control related measures have within it.
- (2) Provide a deeper analysis of the impacts of third country cooperation options. Firstly, the report should clarify to what extent the options relating to third country cooperation differ from the baseline scenario and from each other, preferably with the aid of diagrams. The expected impact of each option on situational awareness and other aims and the associated implementation challenges should then be described in more depth to clarify how effectiveness was assessed.
- (3) Provide monitoring indicators. The report should include a set of indicative monitoring indicators. It should specify which of these relate to general objectives and may be considerably influenced by external factors, and which relate to lower level objectives and desired results. The body that will be responsible for data collection should be indicated.
- (4) Ensure options are scored consistently and with reference to the baseline. The report should present option scores which consistently match the qualitative assessments. The way in which implementation issues have been taken into account when assigning scores should be better explained (or if it proves overly complex to explain how this affects effectiveness scores, separate feasibility scores could be added). The report should also list the baseline option in comparison tables to show the reference point.

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

Drawing on its expert-focussed consultation, the report should mention the different views of stakeholders in the options and/or impacts chapter to help explain which options are seen as ineffective or unfeasible. An effort should be made to provide at least a general impression of which options have most support among Member States.

The practical changes that are expected to result from each option should always be described to underpin the assessment of effectiveness (particularly needed for options 4.1 to 4.3 and baseline option 4 on surveillance tools).

(E) IAB scrutiny process	
Reference number	2011/HOME/008
External expertise used	No
Date of IAB meeting	Written procedure