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| Mid-term evaluation of the Asylum, Migration and Integration Fund 2021-2027  Report |
| PMG Analytics Ltd. |
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# Abbreviations

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| Abbreviation |  |
| AMIF | European Asylum, Migration and Integration Fund |
| CEAS | Common European Asylum System |
| EC | European Commission |
| MA | Managing Authority |
| MoI | Ministry of the Interior |
| MVP | Monitoring, Verification and Payment Unit |
| NFM | Norwegian Financial Mechanism |
| SAR | State Agency for Refugees |
| STAHF | Special Temporary Accommodation Houses for Foreigners |
| TCNs | third-country nationals |
| TWG | thematic working group |

# Executive Summary

The European Asylum, Migration and Integration Fund (AMIF) was established by Regulation (EU) 2021/1147 for the period 2021-2027. It has 4 specific objectives: strengthening and developing the Common European Asylum System (SO1); supporting legal migration and integration of third-country nationals (SO2); combatingirregular migration and ensuring the effectiveness of return (SO3); and solidarity and responsibility sharing between Member States (SO4).

The purpose of this report is to provide an interim evaluation of the implementation of the AMIF programme in Bulgaria, which was carried out in accordance with the provision of Article 44(5) of Regulation (EU) 2021/1060. The main objective of the mid-term evaluation is to ascertain that the regulatory framework and programme is fit for purpose and will contribute to the achievement of the set objectives at a reasonable cost; appropriate support to address changing needs and add value to the EU in line with other funding sources or modalities.

The current mid-term evaluation was conducted between February and March 2024. The data collection methodology included a review of the programme, and programme related documents, procedural and project documents, as well as relevant legislation. In-depth interviews were conducted with 14 representatives of stakeholders. Key methodological challenges included: (1) the short period for conducting the evaluation (20 calendar days), (2) the early stage of program implementation and ongoing implementation activities while the evaluation was being conducted, and (3) the lack of a baseline evaluation, as the ex-post evaluation of AMIF for the period 2014-2020 had not yet started.

The procedural, financial and material progress of the AMIF programme at the time of writing this report is substantial given the short time that has elapsed since the actual approval of the project proposals. During the evaluation period, 4 procedures have been carried out covering all the specific objectives of the programme, with 5 projects selected under the first two procedures for grants to beneficiaries of the Migration Directorate of the Ministry of Interior and the State Agency for Refugees (SAR).

A Monitoring Committee for the AMIF programme has been formed by order of the Minister of Home Affairs dated 16.01.2023. Compared to the previous programming period, the members of the Monitoring Committee have been expanded.[[1]](#footnote-2) Alongside stakeholders in the asylum and migration sector, the Monitoring Committee includes representatives of the social and economic partners (trade unions and employers' organisations), representatives of regional and local authorities, organisations of disadvantaged people, academics and NGOs. Duties of the Monitoring Committee include activities related to the implementation of the programme (methodology and criteria for selection of operations; agreement on indicative annual work programmes, approval of the evaluation plan) and monitoring of the programme (examines the implementation and monitors progress in the implementation of the programme, examines information on the conclusions and recommendations of the annual monitoring reports).

The period 2019-2023, during which the planning of the AMIF programme as well as its implementation takes place, is characterised by dynamics at national and European level, both in terms of the migration situation and policies to counter irregular migration and return. The on-going global conflicts result in a constant migratory pressure towards Europe and Bulgaria in particular, given the specific geographical location of the country at the external borders of the European Union. Bulgaria is one of the entry points for migration routes to the Balkans and the Eastern Mediterranean. For the country, the main migration flows from Syria, Afghanistan and North Africa are continuing and increasing, and new flows are expected, for example from the escalating Israel-Gaza conflict.

In the context of rapidly changing migration challenges and increased migration flows, the programme is responding to the needs of stakeholders that have been identified in the programming period (2020- 2021). In 2021, the programme was formally sent to the EC and was approved in 2022. Work on the texts has continued during this period.

The projects funded so far respond to the needs identified in both the programme and the National Migration Strategy of the Republic of Bulgaria 2021-2025.[[2]](#footnote-3) The projects also provide a continuation of similar activities from the previous programming period. The specific objectives set out in the programme provide a high level of flexibility.

Due to the stage of implementation of the projects approved under the AMIF programme, it is too early to assess how effective they are in terms of achieving the objectives and results. Although there are no specific indicators reported yet, the expectations of the consulted stakeholders are that the final indicator targets will be achieved.

A serious challenge to achieving the programme's objectives is the shortage of available resources and funding, which is expected to be exhausted halfway through the planning period. The rate of absorption of the planned funds is currently high and according to the beneficiaries, the project funding will not be sufficient to cover the basic needs. Regarding the SAR projects, the funds are expected to run out to cover SAR costs well before the end of the project, and the actual need for funds is double that amount. This poses a serious risk to the SAR Centres, as the project covers basic costs of running the centres (food, water, electricity), planning for continued funding is vital to continue covering the basic needs of the SAR Centres. The situation is similar for the projects of the Migration Directorate at the Ministry of Interior, in particular for the provision of operational costs, for the provision of additional security for the Special Temporary Accommodation Houses for Foreigners (STAHF) and for the implementing administrative measures for return of illegally staying TCNs, where funds are also expected to be used well before the end of the projects. The funds for operational costs (food, water, electricity) and for additional security for the STAHF will be exhausted by the end of 2024. This also poses a serious risk to the STAHF, as the projects under AMIF cover basic operational costs and planning for more sustainable funding is essential for their functioning.

The management and control system is detailed and efficient. Both the Managing Authority (MA) and the beneficiaries consider that the overall indicators reflect the main achievements of the programme and are in line with the intervention logic of the AMIF programme. The beneficiaries have also received sufficient guidance from the MA on the content and reporting of the indicators. Beneficiaries expressed their appreciation to the MA for good communication and flexibility.

The MA implements measures to ensure compliance with the horizontal principles set out in the Regulation (EC) 2021/1060 as well as in national legislation, including compliance with the EU Charter of Fundamental Rights in the implementation of the programme - Article 9(1). The application of the principles of equal opportunities, transparency and equal treatment shall be monitored by the Managing Authority at all stages of preparation, evaluation and implementation of operations selected for support.

The AMIF programme is coherent with other EU funds (including other home affairs funds) to a large extent, with some synergies noted with other programmes. Structures, organisational arrangements and coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between different management modes of the same programme. The Managing Authority maintains close coordination between the AMIF and Managing Authorities of programmes funded under the other Regulation 2021/1060 Funds and the Partnership Agreement in order to maximise the impact of assistance in close and similar thematic areas.

The activities funded under the AMIF programme contribute to a large extent to the development of European policies in the field of the Common European Asylum System (CEAS), European policies on legal migration and integration, the EU policies to combat irregular migration, and solidarity between Member States. According to the beneficiaries, the assistance provided under the programme is significant due to limited national resources and increasing migration pressures.

The key recommendations to beneficiaries and the MA include:

* Beneficiaries to consider further expansion of the communication channels and messages to reach the wider public, including wider use of social media;
* Introducing legislative amendments to the Shared Management of EU Funds Act, to reduce the time for approval of specific actions at national level.
* Considering more support and exchange of best practices in regards to the practical implementation of the horizontal principles, foreseen in Regulation (EC) 2021/1060

# Introduction

## Purpose of the evaluation

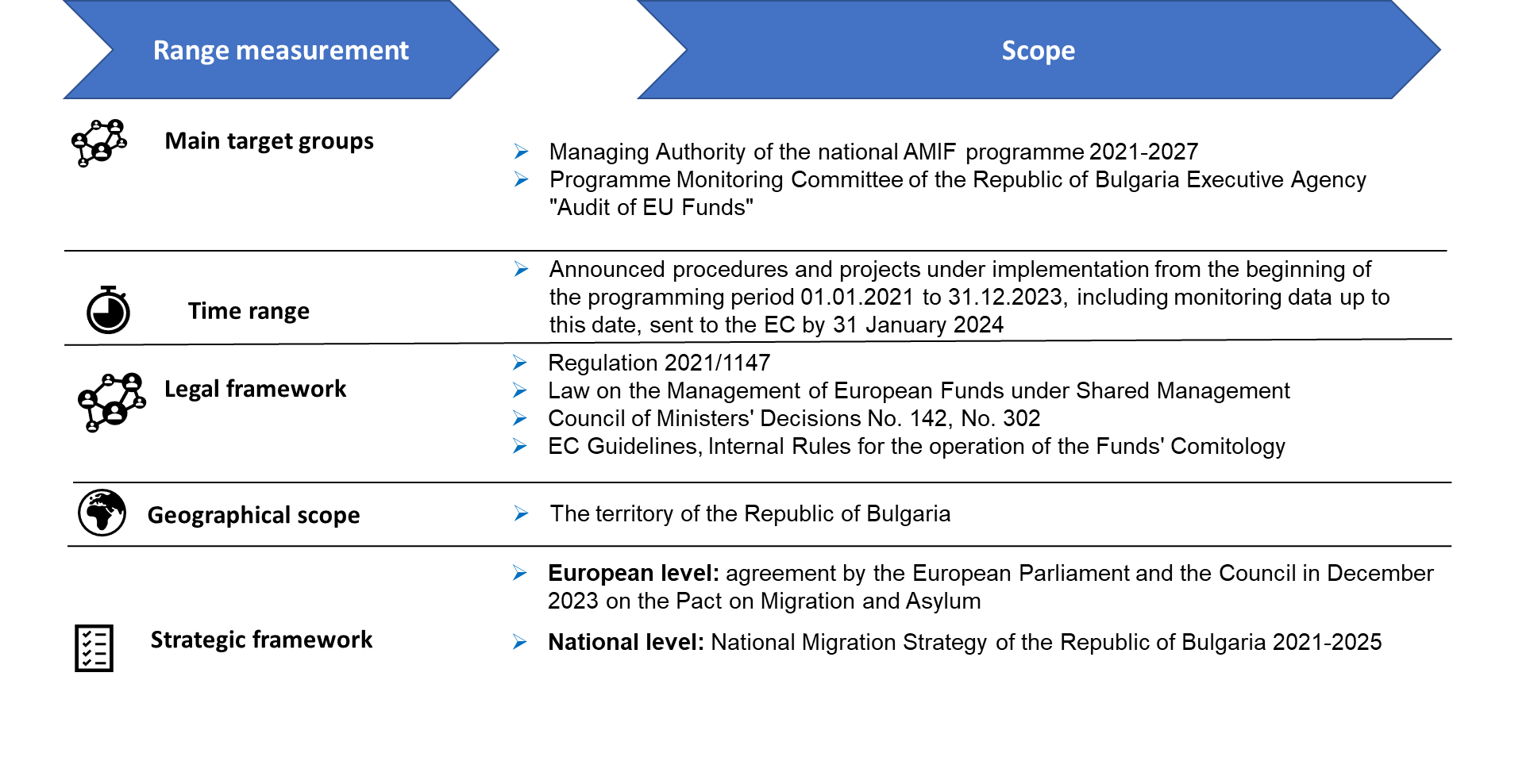
The purpose of this report is to provide an interim evaluation of the implementation of the Asylum, Migration and Integration Fund (AMIF) programme of the Republic of Bulgaria for the period 2021-2027. The evaluation was carried out in accordance with the provision of Article 44(5) of Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Fair Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and the financial rules applicable to them and to the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

The main objective of the mid-term evaluation is to ensure that the regulatory framework and approved programmes under the three Funds are fit for purpose and will provide a contribution to the objectives set at a reasonable cost; appropriate support to address changing needs; and EU added value in line with other funding sources or modalities. One of the objectives of the mid-term evaluation is to make recommendations on how to improve the quality of the content and implementation of the programmes under the three Funds.

With regard to the **2021-2027 AMIF**, the mid-term evaluation will assess the contribution of the programme against the following specific objectives of the Fund:

* Strengthening and developing all aspects of the Common European Asylum System, including its external dimension;
* Strengthening and developing legal migration to Member States in accordance with their economic and social needs and promoting and contributing to the effective integration and social inclusion of third-country nationals (TCNs);
* Contributing to the fight against irregular migration, enhancing effective, safe and dignified return and readmission, and promoting and contributing to effective initial reintegration in third countries;
* Strengthening solidarity and the fair distribution of responsibilities among Member States, in particular with regard to those most affected by the challenges of migration and asylum, including through practical cooperation.

## Scope of the evaluation



The criteria used for the evaluation of the financial instrument are in line with the Better Regulation Guidelines[[3]](#footnote-4) , and include: relevance, effectiveness, efficiency, coherence and EU added value.

The thematic scope of the evaluation includes:

* progress towards achieving the milestones and targets of the implementation framework and the annual reports on the implementation of programme;
* the effectiveness of the management and control system;
* the continued relevance and appropriateness of the implementation measures;
* coordination, coherence and complementarity between actions supported by the Funds and support provided by other Union financial instruments;
* efficiency of resources used to achieve objectives
* the EU added value of actions implemented under the Fund;

## Policy context - migration, asylum and integration

The period 2019-2023, during which the planning of the AMIF programme took place, is characterised by dynamics at national and European level, both in terms of the migration situation and policies to counter irregular migration and return.

With regard to migration flows across Bulgaria's borders, the following trends and events are notable and have had an impact on the work of the competent authorities and needs:

* Since the containment of the migration crisis (2015-2016), irregular migration flows have strongly decreased.
* At the beginning of 2020, with the Covid-19 pandemic, the external European borders were closed. As a result of the restrictive measures globally in the period 2020-2021, illegal migration flows as well as movement across borders in general were severely restricted.
* After the gradual opening of the borders in 2021, there followed two years of increasing pressure from illegal migration at the external borders of both Bulgaria and the entire European Union. The year 2023 marked the year with the strongest migration pressure: over 178,200 cases of irregular crossings were prevented at Bulgaria's green borders, mostly along the borders with Turkey[[4]](#footnote-5). In the same year, a total of 18 544 TCNs were apprehended in the country, both in the interior (14 761) and (mostly) at the borders with Turkey (1747) and Serbia (2257)[[5]](#footnote-6) .
* The Russian invasion of Ukraine in 2022 led to an increase in the flow of Ukrainian refugees across Bulgarian borders. Between 2022 and 2023, 170 970 Ukrainian nationals have sought temporary protection Bulgaria[[6]](#footnote-7), although the majority are believed to have returned to Ukraine.
* At the end of 2023, a decision was taken to accept Bulgaria in the Schengen area, with the abolition of border controls at air and sea borders as of 31.3.2024. At the same time, from this date, Bulgaria will be granted full access to the Visa Information System (VIS) and will start issuing Schengen visas.
* The number of illegally staying TCNs in detention is increasing. In 2023, a total of 18 554 were detained. Of these, 1 803 entered at the state border, 1 990 exited without registration and 14 761 were found to be illegally staying in the interior. This represents a 10.7% increase compared to those apprehended in 2022 (16 767).[[7]](#footnote-8)
* In 2023, a total of 22 518 applications for international protection were submitted in Bulgaria, of which 106 were granted refugee status, 5 682 were granted humanitarian status, 2 950 were refused and 16 211 had their proceedings terminated. This represents a 10.3% increase compared to the number of asylum seekers in 2022 (20 407).[[8]](#footnote-9)
* There is a large gap between the TCNs ordered to leave and those effectively returned to third countries. There is an increase in the number of persons who refuse to cooperate with their forced return, necessitating a police escort. In 2020, the total number of returned TCNs, including those returned under readmission agreements and under the threat of COVID-19, is 427 TCNs, with 770 in 2021, 583 in 2022 and 565 in 2023[[9]](#footnote-10) .

Figure 1. TCNs ordered to leave and those returned (2013-2022)

*Source Eurostat [migr\_eiord]*

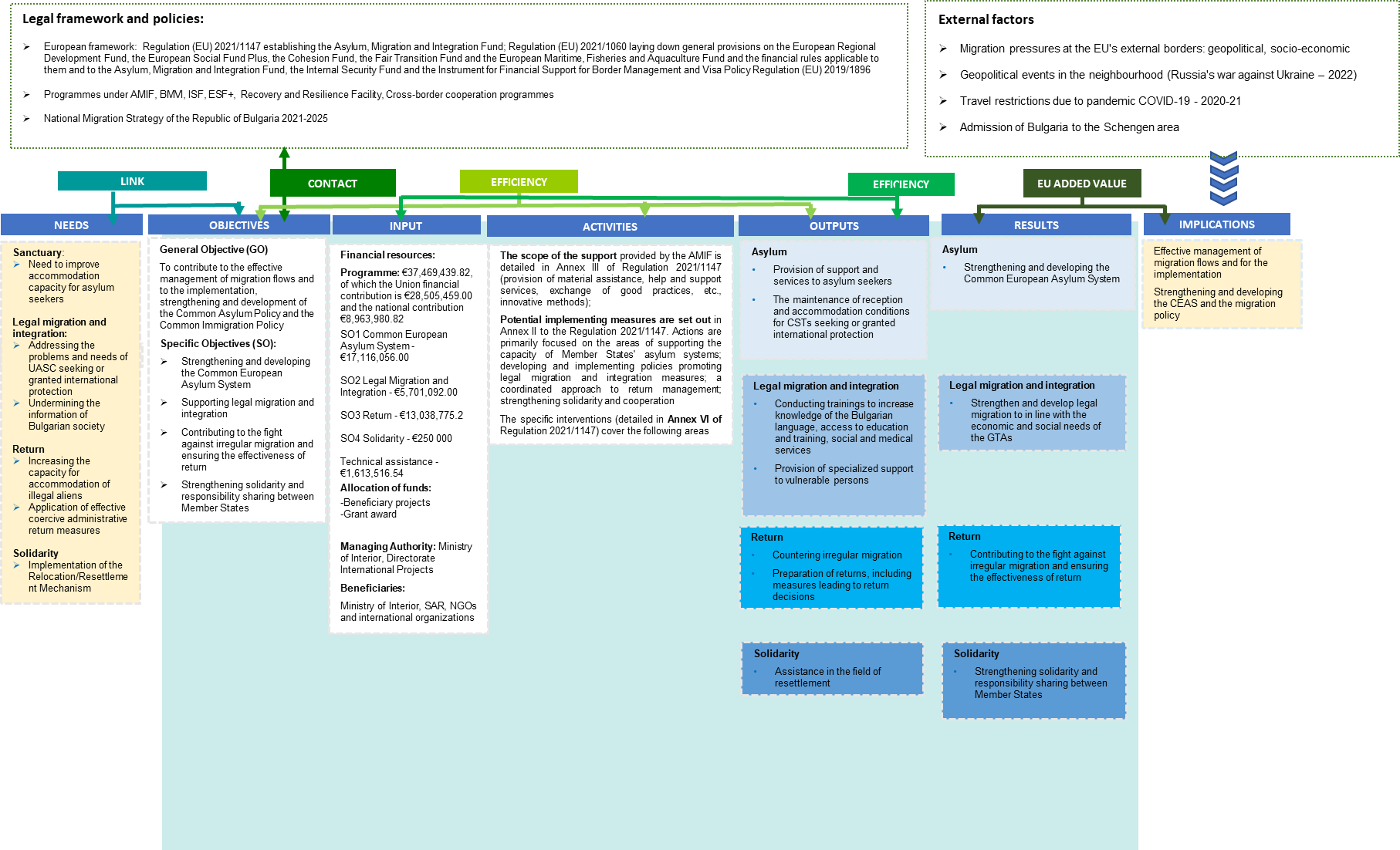
In the period 2019- 2023, many policies on migration, asylum and integration have been developed at European level and reflected in Bulgaria, including in the AMIF programme and in specific actions. The most significant of these include is the political agreement reached by the European Parliament and the Council in December 2023 on the Pact on Migration and Asylum, represents the common EU migration management system. The agreement covers five key proposals of the Pact; once these proposals are formally adopted by the European Parliament and the Council, the pillars of the Pact will be put in place:

* **Verification Regulation**: Establishing uniform rules on the identification of CBPs on arrival, thereby increasing security within the Schengen area.
* **Eurodac Regulation**: developing a common database collecting more accurate and complete data to detect unauthorised movements.
* **Regulation on asylum procedures**: faster and more efficient asylum, return and border procedures.
* **Asylum Migration Management Regulation**: Creation of a new solidarity mechanism between Member States to balance the current system where a few countries are responsible for the majority of asylum applications and clear rules on responsibility for asylum applications.
* **Regulating crises and force majeure**: Ensuring that the EU is prepared to face future crisis situations, including the instrumentalisation of migrants.

## Logic of intervention

The intervention logic of AMIF is presented below. It provides an overview of the general and specific objectives; actions, outputs and intended outcomes; rationale, contextual factors and impacts.

*Figure 2 Intervention logic*



### General and specific objectives

Under Article 3 of Regulation (EU) 2021/1147, the European Asylum, Migration and Integration Fund (AMIF) is established for the period 2021-2027 to further enhance national capacities and procedures for migration management, as well as to strengthen solidarity and responsibility sharing between Member States. 4 specific objectives have been set:

* **Specific objective 1:** Strengthening and developing the Common European Asylum System
* **Specific objective 2:** Supporting legal migration to Member States, including by contributing to the integration of third-country nationals
* **Specific objective 3:** Contribute to the fight against irregular migration and ensure the effectiveness of return and readmission in third countries
* **Specific objective 4:** Strengthen solidarity and responsibility sharing between Member States, in particular with regard to those most affected by the challenges of migration and asylum

### Eligible activities

Actions funded through the AMIF can include a wide range of initiatives, such as:

* ensuring uniform application of the acquis (common set of rules) and priorities related to the Common European Asylum, Legal Migration and Return System
* the provision of support and services in accordance with the status and needs of the person concerned, in particular vulnerable groups
* support for resettlement, humanitarian reception and transfers of applicants for and beneficiaries of international protection
* support for the development and implementation of policies promoting legal migration, such as the development of EU mobility schemes and awareness-raising on appropriate legal channels for immigration
* support for integration measures tailored to the needs of third-country nationals and early integration programmes focusing on education, language and other training (such as civic orientation and vocational guidance courses) to prepare their active participation and acceptance by the host society
* supporting infrastructures for the reception of third-country nationals, including the possible joint use of such facilities by more than one Member State
* supporting an integrated and coordinated approach to return management at EU and Member State level, developing capacity for effective and sustainable return and reducing incentives for irregular migration
* support to assist voluntary return and reintegration
* cooperation with third countries in the areas of asylum, legal migration and the fight against irregular migration and effective return and readmission for migration management purposes

## Assessment methodology and limitations

### Summary of methods used

The methodological approach described below follows the sequential structure outlined in the ToR. An overview of our approach is presented in the graphic below.

Figure 3. General methodological approach

Interview questionnaires and survey

Task 3.3

Writing the final report

Task 3.2

Final analysis and triangulation

DATA COLLECTION

HOME

ANALYSIS AND REPORTING

Task 1.1

Start meeting

Task 1.2

Overview of information sources

Task 1.3

Overall development of the evaluation framework and methodological approach

Task 2.1

Documentary study

Task 2.3

Survey

Data collected for the evaluation

Task 3.1

Quantitative analysis

Final report

PRODUCTS



Task 2.2

Interviews

**TASKS**

**STAGES**

**The inception phase** enabled the team to further develop its understanding of the current legal and strategic framework and the existing empirical evidence on the implementation of the Republic of Bulgaria's 2021-2027 AMIF. Based on this familiarisation, the data collection instruments (interview questionnaires, surveys) were developed to ensure the implementation of the next stages of the programme.

**The data collection phase of the** mid-term evaluation included the following tasks:

* In-depth documentary research;
* Conducting 2 group in-depth interviews with 2 Migration Directorate officers and 3 SAR officers

The final stage, **Analysis and Reporting,** analyzed the available data to answer the key evaluation questions and provide conclusions and recommendations for the remainder of the 2021-2027 AMIF implementation period. In answering the questions, the following analyses were also conducted:

* Analysis and assessment of the socio-economic environment and its impact on programme implementation
* Analysis and assessment of changes in development needs in terms of relevance to the needs of target groups identified in the programming process
* Analysis of the Union added value of the actions implemented under the Fund programme
* Analysis of the effectiveness of management and control systems.
* Analysis of coordination, coherence and complementarity between actions supported by the Fund programme and support provided by other Union funds.
* Analysis of actions carried out with, in or in relation to third countries

The main limitations of the applied methodology are the following:

* **Lack of a reference point**: due to the lack of a final evaluation of the previous financial period (2014- 2020), it was necessary to collect information on the implementation of the programme from the financial period 2014-2020 in the framework of the interviews and documentary review .
* **The short timeframe to complete** the assessment (3 weeks) did not allow to go into much depth on the needs analysis. This was offset by good mobilization by the MA to provide information, distribute the surveys, and schedule the interviews.
* **Lack of sufficient progress in project implementation:** the evaluation of effectiveness was hampered by the early stage of programme implementation, the lack of indicators yet reported, or procurement carried out or implemented. The focus of stakeholder consultations was mainly on the needs and expectations for successful project implementation.

# Current status of the fund

## Procedural progress

|  |
| --- |
| Despite some delays in the approval of the AMIF programme, the procedural progress towards the beginning of 2024 can be described as satisfactory. |

The preparation of the adoption of the AMIF programme started in 2019 with the Council of Ministers' Decision No. 142[[10]](#footnote-11) on the development of the strategic and programming documents of the Republic of Bulgaria for the management of EU funds for the programming period 2021-2027.[[11]](#footnote-12) The Ministry of the Interior (MoI) has been designated as the lead agency for the development of the programme, with representatives of the International Projects Directorate at the MoI included in the working group for the preparation of the Partnership Agreement, established by order of the Deputy Prime Minister of the Republic of Bulgaria*.*

Article 7 of the same Ministers' Decision established thematic working groups (TWG) for the development of the AMIF programme. Article 7 also identifies a wide range of stakeholders who should be members of TWG, which include not only migration stakeholders but also cross-cutting priorities related to human rights, trade unions, employers, local government, NGOs, as well as government institutions responsible at central level for managing EU funds.

The TWG on AMIF was established by Ministers' Decision in December 2019 and started active work on the development of the programme in 2020, using as a basis the received programme document from the European Commission with priority topics to be included in Bulgaria's programme.

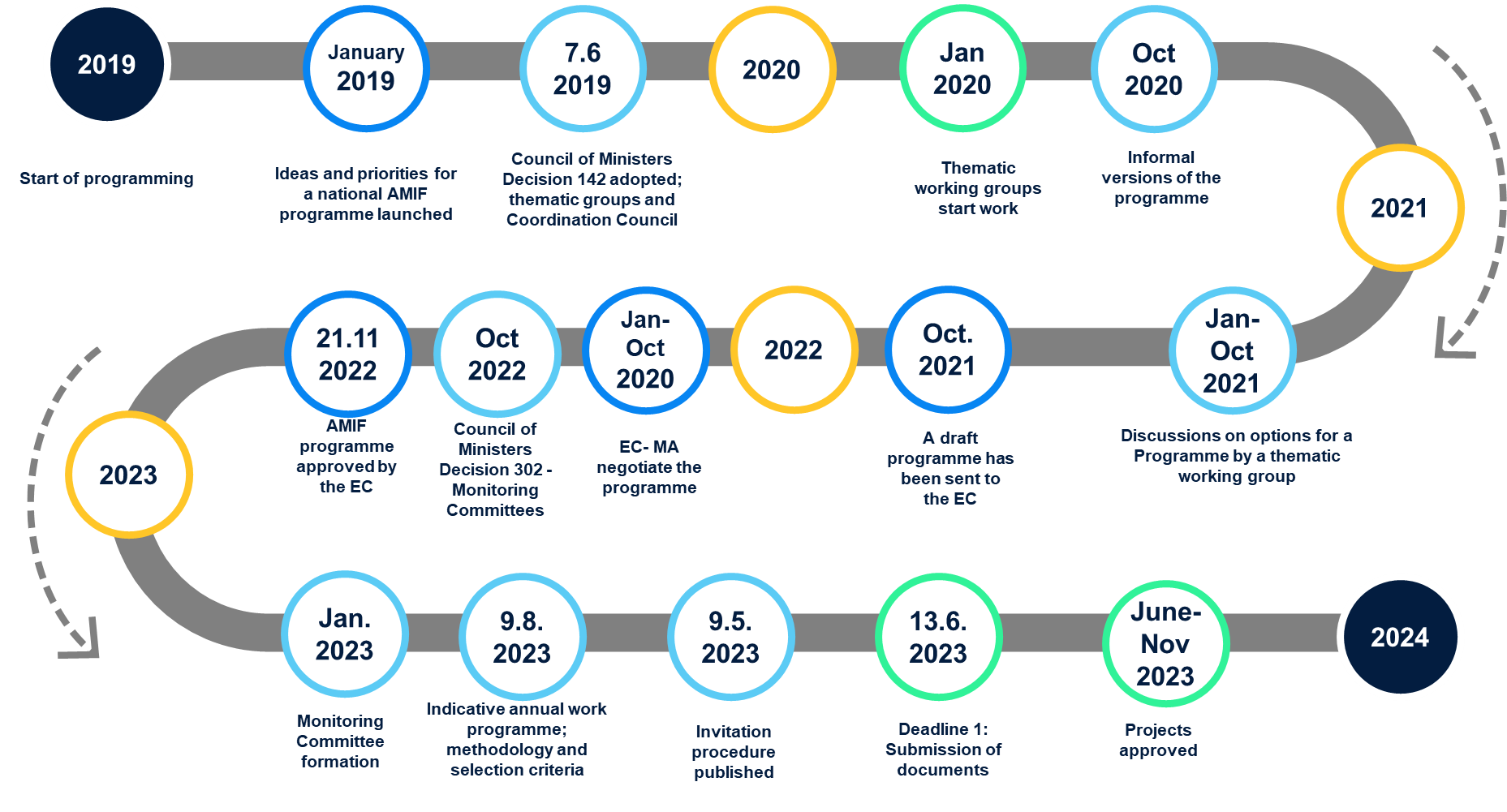
The TWG is headed by a Deputy Minister, the secretariat is the International Projects Directorate and includes representatives of relevant stakeholders working in the field of asylum and migration - public authorities (Central Coordination Unit Directorate at the Council of Ministers; State Agency for Refugees; Migration Directorate - Ministry of Interior, Border Police General Directorate - Ministry of Interior, Ministry of Labour and Social Policy, Ministry of Education and Science; Executive Agency for Programmatic Education; Ministry of Regional Development and Representatives of the Bulgarian Ombudsman) were included in the TWG the preparation of the AMIF Programme.

The competent structures and agencies send information on priorities and measures in the form of conceptual projects with indicative budgets to be included in AMIF. The indicative total value of the conceptual projects received exceeded the available funds by 2-3 times, which necessitated a reduction of the planned funds in the conceptual projects according to the available funds. In October 2021, the initial version of the programme was officially sent to the European Commission (EC). In November 2021, comments were received from the EC on the need to complete the programme. A technical meeting was held between representatives of the Managing authority and the EC.

The programme was approved by the European Commission Decision on 21.11.2022. The Managing Authority took a proactive approach to the preparation of the key documents and structures necessary to start the implementation and achieve the objectives of the programme. A Monitoring Committee was formed in accordance with the provision of Art. 13, para. 3 of Council of Ministers Decree No. 302 of 29.09.2022 by order of the Minister of the Interior. Relevant documents such as Indicative Annual Work Programme for 2023, Methodology and Criteria for Evaluation of Project Proposals and Annual Reports on the Quality of Implementation of the Programmes have been prepared to provide the necessary basis for the effective implementation of the operations planned under the Programme. During the programming period 2021-2027, the range of organisations nominating members to the Monitoring Committee has been significantly extended.Since the beginning of 2023 four procedures have been announced, 2 of which have been completed in 2023 and 2 will be completed in 2024. The first two procedures are for the provision of grants worth about 69 million BGN with specific beneficiaries - the SAR and the Migration Directorate, Ministry of Interior. The set objectives are to improve the reception and accommodation conditions for third-country nationals and to counter illegal migration through effective, safe and dignified return of illegal residents.

The third announced procedure has three deadlines for submitting project proposals, which will end in January 2024. It focuses on the adaptation of asylum seekers with special attention to vulnerable groups, as well as promoting the voluntary return of irregular residents. On 01.12.2023, a fourth procedure, resettlement of TCNs with a budget of €250,000, was announced.

Figure 4 Procedural progress of Bulgaria's AMIF programme (2021-2027) in the period 2019-2023.



*Source: elaboration by PMG Analytics based on annual performance reports and minutes of TWG meetings*

## Financial progress

### Programmed expenditure

Bulgaria's approved programme under the AMIF for the period 2021-2027 totals **€37,469,439.82**, of which the Union financial contribution is **€28,505,459.00** and the national contribution **€8,963,980.82**. The funds have the following breakdown by specific objective:

* SO1 Common European Asylum System - **€17,116,056.00** in total, of which the Union financial contribution is €12,837,042.00 and the national contribution €4,279,014.00 (75% co-financing rate)
* SO2 Legal Migration and Integration - **€5,701,092.00** in total, of which the Union financial contribution is €4,275,819.00 and the national contribution €1,425,273.00 (75% co-financing rate)
* SO3 Return - **€13,038,775.2** in total, of which the Union financial contribution is €9,779,081.46 and the national contribution €3,259,693.82 (75% co-financing rate)
* SO4 Solidarity - **€250**,000 to resettle 25 people
* Technical assistance - flat rate (Article 36(5) of the RAG - **€1,613,516.54**

Figure 5 Financial breakdown by specific objectives

Two specific activities are foreseen in the approved programme:

* Unaccompanied minors €13,361,596.11 in total, of which the Union financial contribution is €12,025,436.79 (90% co-financing rate) and the national contribution €1,336,159.
  + Support to Ukraine €12,249,295.44 in total, of which the Union financial contribution is €11,024,365 (90% co-financing rate) and the national contribution €1,224,929.54.

EU co-financing varies, and for most activities is 75%, except for technical assistance where it is 100%, and for specific activities it is 90%.

### Procedures

Over 97% of the AMIF budget for the new period 2021-2027 has already been allocated to programme activities. With the adoption in February 2023 of the 2023 Indicative Annual Work Programme of the AMIF, four calls for projects are planned and, subsequently, announced, attracting 5 projects (operations) completed in 2023. As of 12.31.2023 Procedure 1 and 2 are fully completed and the financing agreements are signed, while Procedure 3 closes in April 2024 and Procedure 4 in June 2024. 3 projects have been submitted under Procedure 4 and 17 projects have been submitted under Procedure 3.

Figure 6: Procedures completed and started by the MRP

| Procedures/value | Specific objective | Number of operations | Projects | Benefi-  Cite |
| --- | --- | --- | --- | --- |
| Procedure 1  €18,042,716 | SO1 Asylum  RC3 Return | 2  2 | Award of grant:  1.Maintaining and improving reception and accommodation conditions  2.Operational support  3. Provision of funds for operating costs of the ECDC  4. Operational support - Provision of funds for improving the accommodation and security conditions in the Detention Centre | SAR  Migration Directorate - Ministry of Interior |
| Procedure 2  €2 212 572 | RC3 Return | 1 | 1.Enforcement of compulsory administrative measures imposed on the CBP and provision of translation | Migration Directorate - Ministry of Interior |
| Procedure 3  €14,839,693 | SO1 Asylum  SO2 Legal migration and integration  RC3 Return | 17 | 1.Support for the functioning of the safe areas for the accommodation of unaccompanied minors in accommodation centres  2.Measures to provide social, psychological, legal and administrative support  3.Measures to identify and provide appropriate support to victims of human trafficking  4.Development of integration measures and programmes  5.Conducting trainings in Bulgarian language for legally residing GTAs  6.Measures to promote legal migration in Bulgaria  7.Increasing the tolerance of Bulgarian society  8.Informing and counselling GTAs to encourage their voluntary return | Not selected |
| Procedure 4  € 250 000 | SO 4 Solidarity | 3 | grant  1.Resettlement | SAR and municipalities and regions of municipalities[[12]](#footnote-13) |
| Total  €  35, 344, 981 |  | **25** |  |  |

## Physical progress

Physical progress at the time of writing this report is substantial given the short time that has elapsed since the actual approval of the project proposals.

All of the 5 projects are under implementation.

* Under the project "Operational Support through Recruitment of Additional Staff and Ongoing Support" in the SAR, 90% of the planned staff has been recruited.
* Under the Enforcement of Administrative Measures project, more than 200 effective returns out of the 900 planned for the project have been made by February 2024.
* For the remaining 3 projects, procurement has been carried out or is currently underway.

Figure 7. Actual disbursements for ongoing projects

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Project** | **Home** | **Beneficiary** | **Total value** | **Amounts actually paid** | **Duration (months)** |
| [Provision of funds for operating costs of the](https://2020.eufunds.bg/bg/0/21/Project/BasicData?contractId=x%2FQ6QK%2Bf1Gwjt3WRDNPbSg%3D%3D&isHistoric=False)  STAHF  *Specific objective 3* | 04.09.2023 | MINISTRY OF INTERIOR | € 3,028,573.33  (or € 2,271,430 without national co-financing) | € 878,910.03 | 40 |
| [Provision of funds to improve the accommodation and security conditions in the shelter](https://2020.eufunds.bg/bg/0/21/Project/BasicData?contractId=78jymjqi2mH6To0RiVH1dg%3D%3D&isHistoric=False)  *Specific objective 3* | 05.09.2023 | MINISTRY OF INTERIOR | € 3,000,000  (or € 2,250,000 without national co-financing) | € 692,876.84 | 31 |
| [Enforcement of compulsory administrative measures imposed on TCNs and provision of translation](https://2020.eufunds.bg/bg/0/21/Project/BasicData?contractId=K6XEKt%2F0zkgmMVjdygtbAg%3D%3D&isHistoric=False)  *Specific objective 3* | 02.10.2023 | MINISTRY OF INTERIOR | € 2,212,572  (or € 1,659,429 without national co-financing) | € 229,619.48 | 60 |
| [Operational support through recruitment of additional staff and ongoing support in the SAR](https://2020.eufunds.bg/bg/0/21/Project/BasicData?contractId=KqxCv%2FCo4cY5cFW3fsh0dQ%3D%3D&isHistoric=False)  *Specific objective 1* | 01.09.2023 | SAR | €2,480.5 33 | €589,636 | 30 |
| [Ensuring conditions for admission and accommodation in SAR centres under the Council of Ministers](https://2020.eufunds.bg/bg/0/21/Project/BasicData?contractId=Xixe%2FECbGiKO4ov8sAoS3g%3D%3D&isHistoric=False)  *Specific objective 1* | 01.09.2023 | SAR | €9,565, 065 | €1,913.0 13 | 21 |

*Source.* INFORMATION SYSTEM FOR MANAGEMENT AND MONITORING OF EU FUNDS IN BULGARIA 2020

# Evaluation findings

## Relevance

**Relevance** addresses the relationship between needs and problems in society and the goals of interventions, and touches on aspects of programming and design. As circumstances and contexts change over time, the needs and problems that the AMIF programme addresses may change and new ones may arise.

### To what extent does the programme respond to evolving needs?

Overall, the Programme responds to a large extent both to the needs of stakeholders that have been identified in the programming period (2020-2021) and at the present time - i.e. the end of 2023. The projects funded to date meet the needs identified in both the programme and the national migration strategy. The projects also provide a continuation of similar activities from the previous programming period.

The ongoing global conflicts create a constant migration pressure towards Europe and Bulgaria specifically, given the specific geographical location of the country on the external borders of the European Union. Bulgaria is one of the entry points for migration routes to the Balkans and the Eastern Mediterranean. For the country, the main migration flows from Syria, Afghanistan and North Africa are continuing and increasing, and new flows are expected, for example from the escalating Israel-Gaza conflict.[[13]](#footnote-14)

In the context of rapidly changing migration challenges, characterised by the need for comprehensive measures, the AMIF programme addresses and adapts to the needs in the field of migration. The specific objectives set out in the programme provide a high level of flexibility. At the same time, AMIF responds to the needs that are set out in the National Strategy on Migration of the Republic of Bulgaria 2021-2025.[[14]](#footnote-15)

In order to effectively manage the increasing migration flows, the competent institutions in the country (SAR under the Council of Ministers and the Migration Directorate under the Ministry of Interior) have a strong need for operational support. The strategy developed to meet these needs aims to address the most critical needs with proportionate resources. To this end, in preparation for the programme in 2019, in agreement with the partnership principle set out in Article 8 of the REGULATION (EC) 2021/1060 and in implementation of Decision No. 196 of the Council of Ministers, an invitation to participate in the Thematic Working Group (TWG) was extended to the competent structures at national level in the field of migration and asylum. The TWG started work before 2020, chaired by the line Minister of the Interior, in order to develop programme documents depending on the thematic scope. The Managing Authority received initial proposals with conceptual projects with indicative budget.

A review of the minutes of the TWG meetings show that stakeholders have had to prioritise their needs in order to comply with the resources available to Bulgaria under AMIF and the eligible for funding for certain types of activities. Initially, the summary of proposals from stakeholders exceeded almost three times the programme's indicative budget. Beneficiaries interviewed said that they had to forego activities included in their proposals to MA. The projects were prepared based on a needs analysis, including statistical data, expected migration pressures and occupancy/capacity of accommodation and reception facilities.

In relation to **Specific Objective 1: Common European Asylum System**, in 2023, a total of 22 518 applications for international protection were submitted in Bulgaria, of which 106 were granted refugee status, 5 682 were granted humanitarian status, 2 950 were refused and 16 211 had their proceedings terminated. This represents a 10.3% increase compared to the number of asylum seekers in 2022 (20 407).[[15]](#footnote-16) SAR officials said that migration pressures in 2023 were significant (surpassing 2014 levels), which had a serious impact on the capacity to accommodate asylum seekers. Basic needs require the maintenance of reception and accommodation conditions for TCNs seeking or granted international protection, facilities, and support services. Due to intensive use and increased capacity, material conditions of reception centres deteriorate rapidly and require frequent maintenance and upgrading. Operating costs, security and provision of food are essential activities required for the functioning of SAR centres. **The projects funded so far respond to these needs** byensuring the continuation of similar activities from the previous programming period. In particular, direct grant procedure 1 covers specific objective 1 with the beneficiary SAR under the projects '*Operational support through recruitment of additional staff and ongoing support in SAR under the MoJ*' and '*Ensuring reception and accommodation conditions in SAR centres under the MoJ*'.

Covering the running costs (food, water, electricity) will address the basic needs of the agency. The recruitment of additional staff is expected to increase the administrative capacity of the Agency in the implementation of the international protection procedure and the reception of TCNs. It is also foreseen to provide on-going maintenance in SAR centres, which will ensure better accommodation conditions in the territorial units of the agency. However, due to limited financial resources, some needs remained uncovered. In the initial draft proposals, the SAR envisaged a major renovation of the buildings, which are depreciating, including a building in Harmanli with a capacity of 700 people. This activity has been dropped due to lack of sufficient funds in the programme.

In relation to **specific objective 2: legal migration and integration**, there are no approved projects in this area at the time of the evaluation, but procedure 3 covering SO2 is ongoing. In the area of integration, there is no single identified body to manage this process. In the programming of the programme, relevant organisations (e.g. Ministry of Labour and Social Policy, Ministry of Education and Science, UNHCR, Caritas) with experience have met together and worked together to identify priorities in this area.

**The programmed activities are in line with the needs as outlined in the programme as well as the national migration strategy**. The activities foreseen under the specific objective in the programme are aimed at addressing the problems and needs of TCNs seeking or granted international protection, as well as at informing the Bulgarian society in order to address the low level of awareness of the host society about migrants. The main activities under this priority are related to the conduct of trainings to increase knowledge of the Bulgarian language, access to education and training, social and medical services, etc. Special emphasis in the national programme was placed on vulnerable persons, who were provided with specialised support tailored to their specific needs.

In relation to **specific objective 3: return**, the number of illegally staying TCNs in detention is increasing. In 2023, a total of 18 554 were detained. Of these, 1 803 entered at the state border, 1 990 exited without registration and 14 761 were found to be illegally staying in the interior. This represents a 10.7% increase compared to those apprehended in 2022 (16 767).[[16]](#footnote-17) The needs require an increase in the capacity to accommodate illegal aliens as well as the implementation of effective coercive administrative return measures. In recent years, the number of aliens who refuse to cooperate in their forced return has increased, necessitating the organisation of escorts by police officers.

In this regard, the objectives of the three projects implemented by the Migration Directorate of the Ministry of Interior for the enforcement of administrative measures for return, as well as for the provision of funds for the improvement of accommodation and security conditions and for operational costs meet the real needs of stakeholders, as well as the needs identified in the programme and migration strategy.

In relation to **Specific Objective 4: Solidarity**, under the procedure for resettlement of up to 25 persons, SAR and municipalities and regions of municipalities are direct beneficiaries under Article 10 of the Law on Administrative and Territorial Planning of the Republic of Bulgaria. Two district administrations of Sofia - Vitosha district and Kremikovtzi district have also submitted project proposals on 29.02.2024. An administrative contract No 812108-8/02.02.2024 was signed for BGN 146,685 (€75,000). for which a final payment request has been submitted. 9 TCNs have been resettled until 31.12.2023.

The procedure is expected to contribute to strengthening solidarity and a fair distribution of responsibilities among Member States, in particular those most affected by the challenges of migration and asylum, including through practical cooperation. Within the general objective, the implementation of the envisaged operation will contribute in particular to strengthening solidarity and cooperation with third countries affected by migration flows.

### To what extent can the programme adapt to changing needs?

The early stage of implementation of the AMIF programme makes it difficult to assess the extent to which it can adapt to changing needs. By the end of 2023, neither the programme nor the projects approved under it needed to be substantially or non-substantially modified. No contextual changes and related new needs have been discussed in the Programme Monitoring Committee, although there is an event in the period under review that may have an impact on the environment - Bulgaria's accession to the Schengen area in terms of air and sea borders. A large part of the Monitoring Committee's decisions are taken in written procedure (5 written procedures in total for the period) and there were two attendance meetings in 2023. On the one hand, holding written procedures for non-concurrent decisions allows for more flexibility in the implementation of the programme and compliance with the deadlines set in the annual work programmes. On the other hand, it limits the possibilities for members to raise issues related to the changing environment for discussion, which a face-to-face meeting facilitates.

Regarding changes at the level of the AMIF programme, the Managing Authority considers that they are well aware of the rules and procedures for implementing non-material and material changes to the programme. Their experience from previous programming periods indicates that if the need for change is identified and triggered in a timely manner, there is no problem in meeting changing needs.

## Effectiveness

**Effectiveness analysis** looks at how successful EU-funded actions have been in achieving or progressing towards the objectives set. The evaluation aims to form an opinion on the progress made so far and the role of the interventions in achieving the observed changes. The mid-term evaluation also analyses whether the objectives can still be achieved on time or with what delay.

### To what extent is the programme on track to achieve its objectives?

Due to the stage of implementation of the projects approved under the AMIF programme, it is too early to assess how effective they are in terms of achieving the objectives and results. Although there are no specific indicator values reported yet, the expectation of the consulted stakeholders is that the final indicator targets will be achieved.

**SO 1 Asylum**

As a result of the implementation of the operations foreseen under the procedure and the funded projects "Operational support through recruitment of additional staff and ongoing support in the SAR under the Council of Ministers" and "Ensuring reception and accommodation conditions in the SAR centres ", the following results will be ensured: reception and accommodation conditions ensured according to EU standards and international protection procedures aligned with European legislation. All indicators are expected to be met. More than 90% of the planned SAR staff has already been recruited, with other activities ongoing or procurement completed. Activities are also showing good results, based on lessons learned from the previous period. For example, under the activity of supplying ready meals to persons accommodated in the SAR territorial units, the provision of ready meals will be carried out under a catering model, which is expected to alleviate logistical difficulties while improving costs.

In relation to security, following an inspection of the State Agency for National Security, it is proposed not to use external security companies due to the increased risk in the SAR centres and as the security companies are not sufficiently qualified in the specific security of the centres, but to use Ministry of Interior staff, which is expected to improve security in the centres. This would have budgetary implications (4 times more than planned costs).

According to the beneficiary, a major challenge to achieving the objectives is the shortage of available funds and funding, which is expected to be exhausted by the middle of the planning period. The project will run out of funds to cover costs well before the end of the project, and the need for funds is double that amount. Since the project covers basic costs of running the centers (food, water, electricity), planning for continued funding is vital to continue covering the basic needs of the SAR centers.

**SO 3 Irregular migration and return**

As a result of the implementation of the operations foreseen under the procedure and the projects financed "Provision of funds for operating costs for the STAHF ", "[Provision of funds to improve the accommodation and security conditions in STAHF](https://2020.eufunds.bg/bg/0/21/Project/BasicData?contractId=78jymjqi2mH6To0RiVH1dg%3D%3D&isHistoric=False) " и ["Enforcement of compulsory administrative measures imposed on TCNs and provision of transfer"](https://2020.eufunds.bg/bg/0/21/Project/BasicData?contractId=K6XEKt%2F0zkgmMVjdygtbAg%3D%3D&isHistoric=False), the following results will be ensured: the needs of the STAHF will be met; the accommodation conditions for irregularly staying TCNs will be improved and the return to the country of origin or third safe country of irregularly staying foreigners with compulsory administrative measures imposed will be enforced. It is expected that all indicators will be met. The projects are of great assistance to the Migration Directorate due to the increased migration pressure and the need for financial assistance for operational costs.[[17]](#footnote-18) Beneficiaries report significant benefits from project activities, for example the possibility to use rare language translation in preparation for the implementation of return enforcement measures. Similar to SAR, it is expected that the funds available will not be sufficient to implement the activities throughout the period. According to the beneficiary, the funds for the compulsory measures project will be exhausted halfway through the project (in 2.5 years instead of the planned 5 years) , and the funds for the operational costs of the STAHF (electricity, water supply, food for the residents) and for additional security will be exhausted already at the end of 2024.

### To what extent is the monitoring and evaluation framework appropriate to inform progress towards programme objectives?

The monitoring and evaluation framework for the AMIF programme follows rules included in Regulation 2021/1060 (Chapter 1 and 2 of Title IV) for generally applicable provisions and Regulation 2021/114 7 (Section V and Annexes V and VIII). At the national level, the rules for monitoring and evaluation are laid down in the “Law on the Management of European Funds under Shared Management”, where the rules for payments, verification and reporting of expenditure are included in Section II, and in the Council of Ministers' Decision No. 302, where the functions of the Monitoring Committee with regard to monitoring and evaluation are spelled out. Furthermore, in 2023, the Monitoring Committee approved the evaluation plan for AMIF. In this programming period, the rules for monitoring and evaluation of the AMIF programme are aligned for the first time with those of the other Structural Funds. To a certain extent, this facilitates the MA and the Monitoring Committee as they fully apply the applicable national legislation related to the management of EU funds and can rely on the experience gained by other MAs on other programmes in this respect.[[18]](#footnote-19)

Within the Managing Authority, the Monitoring, Verification and Payment Unit (MVP) is entrusted with the main responsibility for monitoring and evaluation of the programme and carries out technical and financial verification through administrative and on-the-spot checks.[[19]](#footnote-20) The MA is also tasked with recording and storing in electronic form the data for each operation required for monitoring, evaluation, financial management, verification and audit purposes in accordance with Annex VII of Council Regulation (EU) No 2021/1060 and ensuring the security, integrity and confidentiality of the data and user authentication. The MA organises meetings with the EC at least twice during the programming period for the AMIF programme to review the quality of the implementation of the programme, follow up on the issues raised during the meeting and inform the EC of the measures taken within 3 months.[[20]](#footnote-21) By 15 February 2023 and by 15 February of each year thereafter up to and including 2031, the MA shall submit an annual report on the quality of implementation to the EC, in accordance with Article 41(7) of Regulation (EU) 2021/1060. The reporting period covers the last accounting year.

An annual quality performance report is entered into the electronic data exchange system - SFC 2021. In this regard, the 2022 and 2023 Annual Reports for the AMIF program have been submitted on time. Five times a year (31 January, 30 April, 31 July, 30 September and 30 November), the MA submits cumulative data on the AMIF programme to the EC in accordance with the template contained in Annex VII of Regulation 2021/1060, except for data on output and outcome indicators, which are sent twice each year (31 January and 31 July). For this purpose, the experts of the MVP Unit verify the completeness and correctness of the data entered for the quality performance indicators/indicators collected/accumulated as a result of the progress reported for the respective period for each project financed under the programmes. The indicator values are reconciled for each individual project and information is generated at programme level. It is correlated with the actual financial information on implementation during the period concerned. On the basis of the data generated, the MVP prepares the information according to the template to be sent to the EC.

The national Information System for Management and Monitoring of EU Funds in Bulgaria is maintained by the Central Coordination Unit and ensures the electronic exchange of information and documents between it, the European Funds for Shared Management (EFSM) management and control bodies and the applicants and beneficiaries of financial support.[[21]](#footnote-22) Pursuant to Article 21 of the “Law on the Management of European Funds under Shared Management”, the Central Coordination Unit, the authorities for the management and control of the EUSF funds, the applicants and beneficiaries shall enter, collect and systemise correct and reliable information on the implementation, management, monitoring, evaluation and control activities of the programmes referred to in Article 3(2) and the projects according to their competence in the Information System for Management and Monitoring of EU Funds and in compliance with the principles of reduction of administrative burden, effectiveness, efficiency and economy.[[22]](#footnote-23) During the interviews, it was mentioned that the national information system is very intuitive and easy to use, very well supported and innovations are constantly being made to facilitate the work of the MA and are successfully communicated.[[23]](#footnote-24) Beneficiaries also consider that the information system facilitates reporting on their projects, although due to internal rules on document flow in their institution the data entered has to be duplicated in written form.[[24]](#footnote-25)

Both the Managing Authority and the Beneficiaries consider that the overall indicators reflect the main achievements of the programme and are in line with the intervention logic of the AMIF programme.[[25]](#footnote-26) The early stage of programme implementation does not allow to assess how easy they are to report and to what extent they will support the evaluation of the impact of the Fund. Currently, beneficiaries do not face difficulties in setting targets for their interventions as they have experience in this respect from previous programming periods. Beneficiaries have also received sufficient guidance from the MA on the content and reporting of indicators.

### How was the involvement of relevant partners ensured at all stages of programming, implementation, monitoring and evaluation?

As described in sections 2.1 и 3.1.1 at the programming stage, the involvement of the partner countries was ensured by the formation of a TWG for the development of the AMIF 2021-2027.

The approval of the programme also establishes the Monitoring Committee.[[26]](#footnote-27) Compared to the previous programming period and thanks to the application of the national provisions applicable to all programmes co-financed by EU funds under shared management in the Republic of Bulgaria, the membership of the Monitoring Committee has been extended.[[27]](#footnote-28) Alongside stakeholders in the asylum and migration sector, the Monitoring Committee includes representatives of the social and economic partners (trade unions and employers' organisations), representatives of regional and local authorities, organisations of disadvantaged people, academics and NGOs. Decree No 302 of the Council of Ministers also lays down the rules for the procedure for identifying representatives of the academic community to participate in the Monitoring Committee and for selecting non-profit public benefit entities, the main objective being to ensure equal access to the opportunity to participate in the Committee and to select the most appropriate representative. Article 12 of the Decree describes in detail all the duties of the Monitoring Committee, which include both important activities related to the implementation of the programme (methodology and criteria for selecting operations; agreeing the indicative annual work programmes, approving the evaluation plan) and the monitoring of the programme (examining implementation and monitoring progress in programme implementation, examining information on the conclusions and recommendations of the annual monitoring reports).

In the period up to the end of 2023, the Monitoring Committee has held two meetings and taken decisions through five written procedures, thereby contributing significantly to the process of preparing for the start of programme implementation through the timely agreement and approval of the necessary documents.

The participation of the members of the Monitoring Committee and the rules for its work are

set out in the Internal Rules of Procedure, which were approved at the very first meeting of the Committee. The Internal Rules clearly spell out the functions of the Committee, its composition, the responsibilities of the Chair and members of the Committee and of the Secretariat, the requirements for its meetings and the rules for decision-making. A Code of Conduct is also included. Interviews with the Managing Authority and the beneficiaries who are part of the Monitoring Committee show that there are currently no major gaps in the functioning of the AMIF Monitoring Committee. In view of the above-mentioned mechanisms, the mid-term evaluation did not identify any shortcomings in the respect of the partnership principle in the programming, implementation, monitoring and evaluation of the AMIF programme, as partners are actively involved from the programming stage and their role is clearly defined in the applicable national legislation and internal rules.

### To what extent does the programme respect or promote horizontal principles in its implementation?

The Managing Authority shall implement measures to ensure compliance with the horizontal principles set out in the REGULATION (EC) 2021/1060 as well as national legislation, including compliance with the EU Charter of Fundamental Rights in the implementation of the programme - Article 9(1). The application of the principles of equal opportunities, transparency and equal treatment shall be monitored by the Managing Authority at all stages of preparation, evaluation and implementation of operations selected for support.

The preparation and implementation of the procedures for the awarding of grants under the AMIF shall be carried out by the Managing Authority in accordance with the criteria and methodology for the selection of operations which are in compliance with the Charter of Fundamental Rights of the European Union. The Application Guidelines set out requirements for grant applicants to declare that the activities envisaged are in line with and contribute to the implementation of the horizontal policies as well as the implementation of the EU Charter of Fundamental Rights and the UN Convention on the Rights of Persons with Disabilities. At the appraisal stage of the project proposal, this compliance shall be verified by the Evaluation Committee and followed up by the Managing Authority staff at the implementation stage of the project proposal.

By signing the Application Form, beneficiaries and partners commit to respect the horizontal principles of Article 9 of Regulation (EU) 2021/1060. Any form of discrimination shall be avoided in the implementation of the project activities. All project activities shall be neutral with regard to the beneficiary's membership of any group, on any grounds whatsoever, and shall not impose any restrictions based on sex, race, nationality, ethnicity, citizenship, origin, religion or belief, education, opinion, political affiliation, personal or social status, disability, age, sexual orientation, marital status, property status or any other grounds established by law or international treaty to which Bulgaria is a party.

The mid-term evaluation of the AMIF did not identify any gaps or problems related to the implementation of the horizontal principles.

### How effective is the program in communicating and disseminating its capabilities as well as accomplishments?

The Managing Authority has developed a communication strategy with properly defined target groups. The strategy was approved by the Monitoring Committee by a non-consensual decision adopted by written procedure in November 2023.[[28]](#footnote-29) The Managing Authority provides wide publicity to the partners by making relevant information available on the Home Office website and by holding regular information events open to all stakeholders.

At the beginning of the new programming period, communication activities include the launch of calls for proposals, information days for beneficiaries and training for beneficiaries. The main communication objectives are to ensure the visibility, transparency and publicity of the activities, to reach the widest possible audience, and to raise awareness of current and potential stakeholders*.*

Dissemination activities reach the target audience and are carried out through an appropriate mix of communication channels, mainly publishing the information online as well as organising information days. Up-to-date information is published regularly on the website of the Managing Authority: <https://www.mvr.bg/dmp> , where regulatory documents, guidelines for beneficiaries, information on information days and other useful information are systematically published. The single information portal of the European Structural and Investment Funds: [www.eufunds.bg](http://www.eufunds.bg) also promotes the funding and transparency of the AMIF processes. The programme's Facebook page is also actively used.[[29]](#footnote-30) Particular attention is paid to the visualisations, short videos and photos that complement the textual content.

The following communication activities have been implemented since the beginning of the programming period:

* 6 in-person and online events have been organized (15 planned by 2029), including 2 AMIF 2021-2027 information days on 18/05/2023 and 27/10/2023.
* 2 trainings for beneficiaries under the Public Procurement Act with a total of 300 participants. The trainings covered aspects of AMIF, BMVI and ISF.
* 168 people participated in person and online (300 pledged by 2029)
* 36 publications on website and social media (490 planned by 2029)
* 145 followers on the fund's Facebook page (200 pledged by 2029)[[30]](#footnote-31)
* 4,700 number of individual users who saw the posts on the Fund's Facebook page [[31]](#footnote-32)

For each of the projects approved under the programme, measures and a budget for communication activities have been set. The activities shall include the promotion of the projects on the websites and social media of the beneficiaries, as well as the production and placement of sustainable signs, clearly visible to the public, on which the Union emblem shall be displayed in accordance with the technical specifications set out in Annex IX of Regulation (EU) 2021/1060. In order to ensure information and publicity, a press release will be produced and distributed in a national daily newspaper at the end of the implementation of the two projects.

In conclusion, the communication and visualisation activities under the AMIF 2021-2027 follow the objectives outlined in the communication strategy and are in line with the implementation of the programme of the Republic of Bulgaria.

## Efficiency

Efficiency looks at the relationship between the resources used for the intervention and the changes generated by the interventions. The interim evaluation will look at how the chosen approach to implementing the interventions has influenced the effects.

### To what extent does the programme support cost-effective measures?

The rate of absorption of planned funds is currently high and according to the beneficiaries[[32]](#footnote-33), project funding will not be sufficient to cover basic needs. This represents a serious risk for SAR centres where the need for funds is double the amount available.

In terms of cost-effective measures, due to the stage of implementation of the interventions approved under the AMIF programme, it is too early to assess how cost-effective they are. Tendering procedures are ongoing for the projects in accordance with the Public Procurement Act. Beneficiaries said that frequent changes in the Public Procurement Law require corresponding changes and delays in the organisation and conduct of tenders. Also, the high interest from companies to carry out some of the project activities provides significant competition, for example activities such as providing meals in SAR homes. There is a tendering challenge from bidders which in some cases can delay the process.

The Managing Authority has set up a system of strict control over the cost-effectiveness of the activities implemented. In the evaluation of project proposals themselves, part of the quality criteria relate to budget and cost effectiveness:[[33]](#footnote-34)

* The project proposal represents the best balance between the amount of support, the activities to be implemented and the achievement of the objectives set;
* The required percentages between budget sections have been met, and the required percentage of indirect and project management costs has been respected;
* The costs are fully necessary for the implementation of the project;
* The values set are realistic and do not exceed the beneficiary's average rates taking into account inflationary processes and/or are comparable to market prices;
* The funding requested (grant) is eligible under the Fund's rules;
* The projected revenue from the project is indicated and allocated as required by the application guidelines.

At the project implementation stage, changes to the original budget line values resulting in an increase or decrease of more than 10% of the agreed budget section values; or the creation of new budget lines must be approved by the MA and a supplemental agreement executed.[[34]](#footnote-35) The MA has the right to refuse the amendment if it is not sufficiently justified. Amendments to aid agreements are not allowed where they would result in an overrun of the budget headings for which there is a fixed amount in a legal act, in an act of European Union law or in the relevant application guidelines; or would call into question the achievement of the project's main objective and planned results and call into question the decision to grant the aid.

### How effective is the management and control system?

***General framework for control***

The management and control system is largely determined by the European and national legal framework for the management of EU funds. The Council of Ministers' Decision No. 70 of 14.04.2010 entrusts the Deputy Prime Minister with the functions related to the management and control system of the AMIF, the BMVI and the ISF, as he manages the overall organisation, coordination and control of the management system of the European Structural and Investment Funds. The control and management system is regulated by Council of Ministers' Decision No. No 712 of 6 October 2020, which provides for:

-Managing Authority for AMIF is determined by the MoI

-Auditing Authority shall be the Executive Agency "Audit of the European Union Funds";

-The functions of the Central Coordination Unit under Article 10 of the Law on the Management of the European Structural and Investment Funds are performed by the Directorate "Central Coordination Unit" at the Ministry of Finance.

Figure 12 Governance Structure for the 2021-2027 AMIF, BMVI and ISF Programmes

A diagram of a computer

Description automatically generated

Minister for Finance

European Commission

Monitoring Committees AMIF and ISF/BMVI

Managing Authority: IPD at the MoI

Auditing authority: EAAEUF

Monitoring Committee central level

Central Coordination Unit: Ministry of Finance

Coordination Council

Financial Flows

Financial Reporting

The management and control process of the AMIF, the BMVI and the ISF also involves:

* Monitoring Committee for the Partnership Agreement of the Republic of Bulgaria;
* Coordination Council for the Management of European Union Funds for the Coordination of Measures for the Implementation of the State Policy for the Economic, Social and Territorial Development of the Country. However, this Council has not met for 2 years[[35]](#footnote-36) .
* A central coordinating unit is actively involved in all stages of preparation and programming.
* Auditing Authority is equidistant from all European funds and has the necessary administrative capacity and independence to be able to exercise real independent scrutiny of programme implementation. To date, no audits have yet been carried out on IMI operations due to their early stage. This is a positive development following the ECA's finding of systemic errors in the operations of the previous Audit Authority (the Internal Audit Unit of the Ministry of Interior), which led to the imposition of a flat 10% financial adjustment on the ISF 2014-2020 programme for the financial years 2021 and 2022.

At the program level, oversight is carried out by (1) AMIF Monitoring Committee, (2) the Audit Authority (AAC), and (3) the Managing Authority (MA).

MA activities are carried out in accordance with the rules and procedures laid down in Regulation (EU) 2021/1060 and the Financial Regulation, Decree No 23 of 13 February 2023 laying down detailed rules for the implementation of grants under programmes financed by the European Funds under shared management for the programming period 2021-2027.

In order to avoid conflicts of interest within the MA and to comply fully with the principles of sound financial management, the MA shall ensure the separation of functions through separate structural units and functional responsibilities:

* Programming of activities is carried out by the Programmes and Projects Unit, with separate teams with separate functional responsibilities for 'programming support' and 'project and procurement selection'.
* Preliminary Control and Irregularities" controls the award of grants according to the procedure described in Annex 3 of the management and control system.
* Verification of expenditure on awarded projects is carried out by the Monitoring, Verification and Payments Unit, where the activities of "technical verification" and "financial verification and accounting" are carried out by separate teams. Verification of technical assistance expenditure including administrative and on-the-spot checks is carried out by a legal or natural person functionally independent of the MA.

In addition, the principle of *segregation of duties* is applied so that one staff member is not responsible for more than one task - authorising, making payment or accounting for it - in the programmes' accounts. These activities must be carried out under the supervision of another MA staff member.

The following observations can be made with regard to the rules envisaged for the different MA functions:

* **Selection of operations**: the methodology for selecting operations has been approved by the Monitoring Committee. Sufficient procedures and guarantees for the objectivity of the process are included.
* **Verification checks** shall be based on a risk assessment and shall be proportionate to the risks identified in advance and in writing. The risk assessment methodology was not identified.
* **The administrative checks** on payment claims shall also include ex-post control of the procedures for the designation of the contractor, the MA may at its discretion carry out a sample check of the documents before the announcement of the procedures for the designation of the contractor by the beneficiaries. The mandatory pre-selection criteria do not include the procedures referred to in Article 18(1)(a) of Regulation (EC) No 1605/2002. 1(13) of the Public Procurement Act (direct negotiation), but only points 8, 9 and 10.
* It is foreseen to hold regular project progress monitoring meetings in face-to-face or online format with the beneficiaries and to submit reports (Annex 8, Project Monitoring Procedure). It is not clear from the procedure when and at what stages these meetings take place.
* **The procedures for risk assessment** as well asdetection of irregularities are defined by the EC.

**Administrative burden**

* In the programming period 2021-2027, the applicable rules for the European Structural Funds under shared management apply for the first time to the AMIF programme. At national level, this means that the regulations applicable to the management, implementation and monitoring of EU funds are fully applied. Although this framework includes some new administrative elements for the MA, to a greater extent the application of the generally applicable provisions has led to a facilitation of its work. The national regulatory framework applicable to the European Structural Funds has been developed on the basis of the long experience of several MAs in managing funds and the MA of the AMIF programme can rely on their extensive experience. A new feature for MAs will be the reporting to the CDC on the progress of the programme, but given the frequency of reporting this progress to the EC, this national obligation is unlikely to increase the administrative burden.
* On the basis of their experience with applying for projects under the AMIF, beneficiaries consider that the administrative burden is comparable to that of the previous programming period and that of other financial instruments.

One of the problems identified that leads to unnecessary delay and repetition of procedures / administrative burden concerns the approval process for specific actions. This process in Bulgaria consists of two stages - the first is the EC approval process. This stage in itself takes about half a year from the announcement of the call by the EC, until the proposal is reviewed by the beneficiaries by the MA and until submission and approval by the EC. However, as the specific activity becomes part of the AMIF Programme, it is treated by Bulgaria’s European Funds Management Act as part of the Programme. As specific actions are not foreseen in the other Structural Funds, the European Funds Management Act also does not provide for an exception to the general rules for the next stage of the procedure. Instead of the beneficiary being able to use the funds immediately, the MA has to carry out the approval procedure again, with a 3-month deadline for collecting a project proposal based on what has already been approved by the EC and the MA itself. Thus, the whole process again takes additional time and in practice overlaps completely in its substance with the approval process already carried out.

### To what extent is further simplification achievable and how?

Beneficiaries and MAs were unanimous that the national information system significantly facilitates the exchange of information between them. It is a system that has been used for another programming period and to a large extent any problems related to its functioning have been eliminated.[[36]](#footnote-37) In addition, the functionalities of the national information system are constantly being improved and the MA and beneficiaries are always kept informed of these improvements. The only problem mentioned by the beneficiaries is that the information they enter in the national information system has to be duplicated in the internal document flow of their institution.[[37]](#footnote-38) This is largely related to the internal rules of the beneficiary institution and not relevant to the requirements at EU level.

In summary, the evaluation does not note significant scope for potential further simplification.

## Coherence/compliance

The coherence assessment includes a review and analysis of how well the different activities and priorities of the national programmes are compatible and work together. The examination of internal coherence will include an examination of how the different components of the interventions work together to achieve the objectives of the programme, including coherence between measures and the specific objective, and between policy and specific objectives.

### To what extent is the programme aligned with the initiatives supported by its policy area, in particular with the support under thematic mechanism in different governance regimes?

Structures, organisational arrangements and coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between different ways of managing the same programme. The Managing Authority shall maintain close coordination between the AMIFand the Managing Authority of programmes funded under the other Regulation 2021/1060 Funds and the Partnership Agreement in order to maximise the impact of assistance in close and similar thematic areas.

The Monitoring Committee includes representatives of relevant stakeholders working in the field of internal security - public authorities, international and non-governmental organisations, academia, economic and social sector organisations and regional partners, where mechanisms are in place to ensure effective coordination between the Managing Authorities of the programmes financed by other funds under the REGULATION (EC) 2021/1060 in the framework of the Partnership Agreement, through the participation of representatives of the Decision No 275 of 6 April 2023 of the Council of Ministers designates the Executive Agency for the Audit of European Union Funds as the audit authority for the programme, thus ensuring the introduction of a unified approach to the management of EU funds and coordination between the responsible institutions at national level.

### To what extent is the programme coherent with other EU funds (including other home affairs funds), in particular with EU external action?

The Managing Authority shall actively ensure that the objectives and activities of the programme are consistent with other forms of support and that there is no overlap with other programmes. Structures, organisational arrangements and coordination mechanisms are in place to ensure coordination, complementarity and interaction with other forms of support at national, European and international level.

In the field of **international protection and asylum**, the financial resources provided under the AMIF complement the funds provided by the State budget of the SAR.

In the area of **integration and legal migration**, funding is split between different programmes depending on the type of measures (e.g. education, inclusion and labour market measures), including the AMIF, the national Human Resources Programme/EFF+, the European Regional Development Fund (ERDF), Erasmus+. AMIFprovides initial adaptation and guidance measures until the integration of applicants or beneficiaries of international protection into the labour market as well as into the education, health and employment systems. The National Human Resources Development Programme (HRDP) co- -financed by the European Social Fund+ (ESF+) complements the AMIF for measures related to medium- and long-term labour market integration. Integration measures, in particular the construction, expansion and access to services in education, employment, housing, social, health and childcare are financed by ESF+ (education, inclusion and labour market measures) and ERDF) . Under Erasmus+ there is potential for action to improve the education system and adapt it to the special needs of migrants.

In the area of **combating irregular migration and return***,* the implementation of return procedures is supported under the FSMF (forced return and assisted voluntary return and reintegration) and complemented by funds from the European Border and Coast Guard Agency (Frontex, joint return operations) and national budget funds (under readmission agreements)*.*

The Norwegian Financial Mechanism (NFM) 2014-2021 implements projects to develop the administrative capacity of public institutions in the field of asylum and return. Additional funding has been secured under the NFM for the implementation of various measures in the support areas under the AMIF.

In summary, the mid-term evaluation of the AMIF did not identify any gaps, problems or overlaps of AMIF funding with other programmes or initiatives at national or EU level.

## Added value for the EU

EU added value seeks changes that result from EU support, in addition to expected national actions. The added value of EU funding is analysed in terms of whether actions have been funded that would not otherwise have taken place, or would not have taken place on such a scale or in such a timely manner.

### To what extent does the programme generate EU added value?

The activities funded under the AMIF programme contribute greatly to the development of European policies in the field of the Common European Asylum System, European policies on legal migration and integration, the single policy to combat irregular migration, and solidarity between Member States. According to the beneficiaries, the assistance provided by the programme is large due to the limited national resources and the increasing migratory pressure, given the geographical situation of the country. [[38]](#footnote-39) In any case, the provision of the national budget would have made it more difficult for the beneficiaries and had economic consequences for them in other areas. [[39]](#footnote-40)

Finally, the programme focuses on interventions that have a high EU added value and target groups where the results at EU level can go beyond what Bulgaria can achieve acting alone.

# Conclusions and recommendations

## Conclusions

**The procedural, financial and physical progress of the AMIF programme** at the time of writing this report **is substantial** given theshort time that has elapsed since the actual approval of the project proposals. During the evaluation period, 4 procedures have been carried out covering all the specific objectives of the programme, and 5 projects have been selected under the first two procedures for grants to beneficiaries of the Directorate of Migration at the Ministry of Interior and the SAR.

In the context of rapidly changing migration challenges and increased migration flows, **the programme responds to a large extent both to the real needs of stakeholders that have been** identified in the programming period (2020-2022 ) and at the present time - i.e. end of 2023. The projects funded so far respond to the needs identified in both the programme and the National Migration Strategy 2021-2025.[[40]](#footnote-41) The projects also provide a continuation of similar activities from the previous programming period. The specific objectives set out in the programme provide a high level of flexibility.

Due to the stage of implementation of the projects approved under the AMIF programme, it is too early to assess how effective they are in terms of achieving the objectives and results. Although there are no specific indicator values reported yet, the expectations of the consulted stakeholders are that the **final indicator targets will be achieved**.

**A serious challenge to achieving the programme's objectives is the shortage of available resources and funding, which is expected to be exhausted halfway through the planning period.** Therate of absorption of the planned funds is currently high and according to the beneficiaries, the project funding will not be sufficient to cover the basic needs. The project will run out of funds to cover SAR costs well before the end of the project, and the need for funds is double that amount. This poses a serious risk to the SAR Centres as the project covers basic costs of running the centres (food, water, electricity), planning for continued funding is vital to continue to cover the basic needs of the SAR Centres. The situation is similar for the projects of the Migration Directorate, in particular for the provision of operational costs, for the provision of additional security for the SARCs and for the enforcement measures, where it is also expected that the funds will be used well before the end of the projects. The funds for operational costs (food, water, electricity) and for additional security will be exhausted by the end of 2024. This also poses a serious risk to the special homes of the Directorate of Migration, as the projects under AMIFcover basic costs and planning for more sustainable funding is essential for their functioning.

**The management and control system is detailed and efficient.** Both the Managing Authority and the beneficiaries consider that the overall indicators reflect the main achievements of the programme and are in line with the intervention logic of the AMIF programme. The beneficiaries have also received sufficient guidance from the MA on the content and reporting of the indicators. Beneficiaries expressed their appreciation to the MA for good communication and flexibility.

The AMIF programme is coherent with other EU funds (including other home affairs funds) to a large extent, with some synergies with other programmes.

The activities funded under the AMIF programme contribute greatly to the development of European policies in the field of the Common European Asylum System, European policies on legal migration and integration, the single policy to combat irregular migration, and solidarity between Member States. According to the beneficiaries, the assistance provided under the programme is large due to limited national resources and increasing migration pressures.

## Recommendations

The recommendations developed are intended to support the next stage of implementation of the AMIF programme. The recommendations are addressed both to the Managing Authority, the International Projects Directorate of the Ministry of the Interior, but also to the beneficiaries / members of the Monitoring Committees that discuss and adopt changes to the programmes and other relevant le gislation.

### Programming

**Reduction of approval timeframes for specific actions:** approval timeframes for specific actions currently take more than a year. These include repetition of the approval process - with the project being approved once by the EC, and again a second time by the MA. As specific actions are not foreseen in the other Structural Funds, the European Funds Management Act also does not provide for an exception to the general rules for approval of projects already approved under the specific action approval process. The IPD should propose the necessary legislative changes to the European Funds Management Act to shorten the deadlines and avoid the need to re-approve projects of beneficiaries under specific actions already approved by the EC.

### Horizontal measures

**Developing capacities to implement cross-cutting principles:** although instructions and organization to communicate cross-cutting principles (respect for human rights, respect for the interests of vulnerable groups, non-discrimination, decarbonization), this may not be sufficient to implement these principles in practice. This is partly due to the lack of established practices along these lines in the MoI and other beneficiary institutions. In order to achieve better results, additional measures could include (1) sharing experiences with institutions or managing authorities of programmes that have more substantial experience (e.g. the Education Programme or the Human Resources Programme); (2) practical training with external specialist speakers; (3) bringing in consultants to support these processes in developing procurement activities or specifications (e.g. for construction or repair works).

### Communication strategy

**More targeted and extensive communication through social media: the planned** communication activities for the already approved operations are few and do not reach the general public sufficiently. Communication activities through social media (Facebook) are only carried out, but the metrics used do not allow to understand the extent to which information reaches the general public .

The AMIF funds are substantial and enable a better thought out social media communication strategy to reach the general public in Bulgaria. Given the public and political importance of policies related to migration, the messages that will reach the general public will have many positives:

* increased confidence in the Ministry of Interior and SAR;
* increased trust in the EU and the principles of solidarity, the understanding that managing migration flows is a common effort and responsibility;
* increased sense of security for citizens, understanding the investments being made.

Beneficiaries should be encouraged to invest in social media messages instead of different types of stationery, such as:

* Use the right forms of communication (purposefully developed videos) for key operations;
* Expand the range of communication channels used (besides Facebook, Instagram, Youtube, media partnerships);
* They target messages to specific audiences (e.g. citizens in areas close to the border with Turkey, or those whose social profile is "Eurosceptic").

Сключен договор с фирма за ФБ

Annexes

1. Analytical framework

|  |  |
| --- | --- |
| **LINK** | |
| **Evaluation question** | **Indicative assessment criteria** |
| To what extent does the programme respond to evolving needs? | * The stakeholders of the programme are correctly identified in accordance with the objectives set out in the legal basis. * The needs analysis that led to the definition of the programme and the associated allocation of resources is consistent with the respective current and future needs of the relevant stakeholders. * The strategy developed to meet these needs, which is expressed in specific milestones and targets, aims to meet the most critical needs with proportionate resources. * The list of implementation measures included in the legal basis and planned under the programme is appropriate to meet the current and future needs of the target groups. * The work programme addresses the main priority needs and key target groups. |
| * To what extent can the programme adapt to changing needs? | * The needs assessment shall be carried out and updated regularly or as relevant contextual changes occur. * Monitoring Committee able to provide timely information on changing needs * There is a sufficient degree of flexibility in the design of interventions. * Where necessary, minor changes to the programme can be implemented quickly. * Policies and procedures are in place to ensure that significant program adjustments can be made in a timely manner if new needs arise. * If needs have changed since the adoption of the programme, programme interventions have been adapted in a timely manner or new needs have been adequately addressed through other instruments. * Procurement procedures ensure flexibility and bottom-up feedback. |
| **EFFICIENCY** | |
| * To what extent is the programme on track to achieve its objectives? | * Implementation has started with the operations selected for programme support under all relevant specific objectives and types of intervention, except where a delayed start is planned. * The early progress in achieving milestones and targets, taking into account the timing of programme adoption, is in line with expectations. * Challenges that affect performance and progress towards the Fund's objectives are properly identified and linked to effective remediation strategies. * The programme supports the types of interventions and types of actions known to be effective according to the available evidence * The Fund shall make use of available good practices where appropriate and possible. |
| * To what extent is the monitoring and evaluation framework appropriate to inform progress towards programme objectives? | * A robust electronic data exchange system is in place to record and store monitoring and evaluation data. * The data recorded in the system is reliable. * Monitoring requirements are properly understood by participants in the data submission process and training or information sessions are arranged as necessary. * Reporting on the outcome indicators correctly reflects the level of performance on the ground (no over- or under-reporting). * The common indicators reflect the main achievements of the programme in line with the intervention logic of the programme. * Programme-specific indicators are used to fill any significant gaps in the general indicators based on the programme's intervention logic. * The comprehensive set of data recorded provides sufficient evidence to use as a basis for evaluating the impact of the funds, thus paving the way for subsequent evaluation. |
| * How was the involvement of relevant partners ensured at all stages of programming, implementation, monitoring and evaluation? | * There is a strategy to identify, inform and reach the most appropriate partners, which aims to ensure their balanced representation in the IPs. * Relevant partners are identified and involved at the programming stage. * The relevant partners shall participate in the ASC in accordance with their role as defined in the relevant rules of procedure. * Actions have been put in place to allow partners to be involved at all stages of the programme cycle. |
| * To what extent does the programme respect or promote horizontal principles in its implementation? | * Appropriate organisational and procedural measures are in place to ensure compliance with the EU Charter of Fundamental Rights in the implementation of the programme - Article 9(1). * Appropriate organisational and procedural measures are in place to ensure that appropriate steps are taken to take into account and promote gender equality and gender mainstreaming at all stages of the preparation, implementation, monitoring, reporting and evaluation of the Fund - Article 9(2) * Appropriate organisational and procedural arrangements are in place to enable appropriate steps to be taken to prevent discrimination on all grounds and at all stages of the programme cycle - Art. 9(3) * The Programme has appropriate mechanisms in place to ensure that implementation is consistent with the objective of promoting sustainable development as set out in Article 11 TFEU, taking into account the UN Sustainable Development Goals, the Paris Agreement and the principle of 'no significant harm' - Article 9(4). |
| * How effective is the program in communicating and disseminating its capabilities as well as accomplishments? | * A communication strategy is in place with properly defined target groups and appropriate monitoring measures, including appropriate and measurable targets for communication activities. * Dissemination activities reach the target audience and are carried out through an appropriate mix of communication channels and platforms, including social media, and generate interactions. * Funding opportunities are advertised appropriately and reach the identified target group of potential beneficiaries. |
| **EFFICIENCY** | |
| * To what extent does the programme support cost-effective measures? | * The Fund supports the types of interventions that are known to be cost-effective, based on available evidence. * Initial data from operations show that unit costs are in line with or below existing benchmarks and estimates. * Differences in unit costs between similar operations within the same programme can be explained and justified * For very specific, urgent or innovative actions, appropriate mechanisms exist to ensure that cost-effectiveness is considered as a criterion for beneficiary selection. |
| * How effective is the management and control system? | * The management and control system described in accordance with the legal basis is designed to ensure the effectiveness of the selection of operations, management tasks, the operation of the IP, the implementation of anti-fraud measures and procedures, the performance of the accounting function and the recording and storage of data for each operation. * The administrative burden is proportionate for all implementers (managing authorities, intermediate bodies) compared to the previous programming period/ similar services offered to comparable target groups without programme support. * The administrative burden is proportionate for all beneficiaries compared to the previous programming period/ similar services offered to comparable target groups without programme support. * The administrative burden is proportionate for all end-users, e.g. compared to the previous programming period/ similar services offered to comparable target groups without programme support. * Absence of 'gold-plating' at national level (e.g. by managing authorities, intermediate bodies, national audit authorities), i.e. requirements are not interpreted more restrictively than the legal basis or relevant documents providing methodological advice to Member States, unless there is good reason. * Absence of "gold plating" at EU level, i.e. requirements are not interpreted more restrictively than those in the legal basis and unless there is good reason. * The simplified cost options used lead to simplification on the ground. * Technical assistance shall be used to strengthen the command and control system where necessary. |
| * To what extent is further simplification achievable and how? | * There is evidence of legal requirements, procedural rules or practices that create a disproportionate administrative burden at EU or Member State level and there are concrete alternatives. * There is the option to additionally use simplified cost and financing options that are not linked to cost options. * There is evidence of a lack of coordination between the actors involved in the implementation of the Fund, leading, for example, to a lack of coherence, increased administrative burden, etc. * There are problems with electronic data interchange systems that cause delays and can and should be addressed. |
| **CONSISTENCY/COMPLIANCE** | |
| * To what extent is the programme aligned with the initiatives supported by its policy area, in particular with the support under thematic mechanism in different governance regimes? | * Structures, organisational arrangements or coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between different ways of managing the same programme. * Coordination mechanisms and arrangements are used regularly and to good effect. * The alleged overlap is in fact justified for objective reasons (e.g. same target group but different type of measure/different need being addressed/different readiness for the type of financial support chosen) * The programme is aligned with ongoing policy agendas at EU and national level. * There is evidence of inter-agency cooperation |
| * To what extent is the programme coherent with other EU funds (including other home affairs funds), in particular with EU external action? | * Structures, organisational arrangements or coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between other EU funds, in particular cohesion policy and EU external action. * Coordination mechanisms and arrangements are used regularly and to good effect. * The alleged overlap is in fact justified for objective reasons (e.g. same target group but different type of measure/different need being addressed/different readiness for the type of financial support chosen) * The programme offers support for cross-cutting policy programmes, complementing support offered by other EU funds. |
| ADDED VALUE FOR THE EU | |
| * To what extent does the programme generate EU added value? | * The Fund focuses on areas, interventions and target groups where results at EU level can go beyond what Member States can achieve acting alone. * There is evidence of reach effects, i.e. additional target groups or additional types of interventions. * There is evidence of economies of scale, i.e. greater volume of services/end users. * There is evidence of functional effects, i.e. training and increased capacity to manage the delivery of public support within the participating administrations. |

1. Methodology

Table 3. In-depth interviews conducted

|  |  |  |  |
| --- | --- | --- | --- |
| Code[[41]](#footnote-42) | Position | Structure | Mode / Date of interview |
| 1 | Group interview with the Head of the Enforcement of Administrative Measures Sector and the Head of the Finance Sector | Migration Directorate | Online / 22.2. 2024 |
| 1 | Group interview with the Deputy Chairperson of the SAR; project manager and project coordinator | SAR | Online / 22.2. 2024 |
| 1 | Managing Authority PROGRAMMES AND PROJECTS DEPARTMENT | DMP | Online / 19.02. 2024 |
| 2 | Managing Authority - MONITORING, VERIFICATION AND PAYMENTS DEPARTMENT | DMP | Online / 19.02. 2024 |
| 1 | Central Coordination Unit | Ministry of Finance | Online / 27.2.2024 |

1. Decree of the Council of Ministers No. 302 of 29.09.2022 [↑](#footnote-ref-2)
2. [migration-strategy-2021-25.pdf (mvr.bg)](https://eu-hr.mvr.bg/docs/librariesprovider79/%D0%B4%D0%BE%D0%BA%D1%83%D0%BC%D0%B5%D0%BD%D1%82%D0%B8/%D1%81%D1%82%D1%80%D0%B0%D1%82%D0%B5%D0%B3%D0%B8%D1%8F-%D0%BF%D0%BE-%D0%BC%D0%B8%D0%B3%D1%80%D0%B0%D1%86%D0%B8%D1%8F-2021-25.pdf?sfvrsn=75b3666_2) [↑](#footnote-ref-3)
3. See: https://commission.europa.eu/law/law-making-process/planning-and-proposing-law/better-regulation/better-regulation-guidelines-and-toolbox\_en [↑](#footnote-ref-4)
4. See: https://iacp-sofia.mvr.bg/press/актуална-информация/актуална-информация/новини/преглед/новини/служители-на-гдгп-са-предотвратили-близо-180-000-опита-на-мигранти-да-влязат-незаконно-в-българия [↑](#footnote-ref-5)
5. Monthly Information on the migration situation in Bulgaria for December 2023 available at: [www.mvr.bg/docs/default-source/planiraneotchetnost/справка-декември-2023\_internet.pdf?sfvrsn=432901b2\_2](http://www.mvr.bg/docs/default-source/planiraneotchetnost/справка-декември-2023_internet.pdf?sfvrsn=432901b2_2) [↑](#footnote-ref-6)
6. See Eurostat statistics: <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240208-1#:~:text=On%2031%20December%202023%2C%204.31,protection%20status%20in%20the%20EU>. [↑](#footnote-ref-7)
7. MINISTRY OF INTERNAL AFFAIRS, MONTHLY INFORMATION on the migration situation in the Republic of Bulgaria for December 2023, <https://iacp-sofia.mvr.bg> [↑](#footnote-ref-8)
8. MINISTRY OF INTERNAL AFFAIRS, MONTHLY INFORMATION on the migration situation in the Republic of Bulgaria for December 2023, <https://iacp-sofia.mvr.bg> [↑](#footnote-ref-9)
9. MINISTRY OF INTERNAL AFFAIRS, MONTHLY INFORMATION ON THE MIGRATION SITUATION IN THE REPUBLIC OF BULGARIA<https://iacp-sofia.mvr.bg> [↑](#footnote-ref-10)
10. Decree No 142 of 7 June 2019 on the development of the strategic and programming documents of the Republic of Bulgaria for the management of the European Union funds for the programming period 2021-2027, available at https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=138460. [↑](#footnote-ref-11)
11. Decision No. 196 of 11 April 2019 on the approval of the analysis of the socio-economic development of Bulgaria 2007-2017 for the definition of national priorities for the period 2021-2027, the list of policy objectives to be supported during the programming period 2021-2027 and the list of programmes and lead agencies for their development, available at https://www.eufunds.bg/sites/default/files/uploads/eip/docs/2019-04/%D0%A0%D0%9C%D0%A1%20196%202019.pdf. [↑](#footnote-ref-12)
12. pursuant to Article 10 of the Law on the Administrative Territorial Structure of the Republic of Bulgaria [↑](#footnote-ref-13)
13. SAR interview; Ministry of Interior statistics <https://iacp-sofia.mvr.bg/> [↑](#footnote-ref-14)
14. [migration-strategy-2021-25.pdf (mvr.bg)](https://eu-hr.mvr.bg/docs/librariesprovider79/%D0%B4%D0%BE%D0%BA%D1%83%D0%BC%D0%B5%D0%BD%D1%82%D0%B8/%D1%81%D1%82%D1%80%D0%B0%D1%82%D0%B5%D0%B3%D0%B8%D1%8F-%D0%BF%D0%BE-%D0%BC%D0%B8%D0%B3%D1%80%D0%B0%D1%86%D0%B8%D1%8F-2021-25.pdf?sfvrsn=75b3666_2) [↑](#footnote-ref-15)
15. MINISTRY OF INTERNAL AFFAIRS, MONTHLY INFORMATION on the migration situation in the Republic of Bulgaria for December 2023, <https://iacp-sofia.mvr.bg> [↑](#footnote-ref-16)
16. MINISTRY OF INTERNAL AFFAIRS, MONTHLY INFORMATION on the migration situation in the Republic of Bulgaria for December 2023, <https://iacp-sofia.mvr.bg> [↑](#footnote-ref-17)
17. Interview Migration Directorate at the Ministry of Interior [↑](#footnote-ref-18)
18. Interview CDC1 [↑](#footnote-ref-19)
19. ISF, AMIF and BMVI 2021 - 2027. [↑](#footnote-ref-20)
20. ISF, AMIF and BMVI 2021 - 2027. [↑](#footnote-ref-21)
21. Article 22 of the Law on the Management of European Funds under Shared Management [↑](#footnote-ref-22)
22. Art. 21 of the Law on the Management of European Funds under Shared Management [↑](#footnote-ref-23)
23. Interview DMP2 [↑](#footnote-ref-24)
24. Interview Migration Directorate1 [↑](#footnote-ref-25)
25. Interview DMP2, Interview Migration Directorate1, Interview SAR1 [↑](#footnote-ref-26)
26. According to the provision of Art. 302 of 29.09.2022 and by order of the Minister of the Interior [↑](#footnote-ref-27)
27. Decree of the Council of Ministers No. 302 of 29.09.2022 [↑](#footnote-ref-28)
28. Minutes of the written procedure for non-consensual decision-making of the Monitoring Committee for the Asylum, Migration and Integration Fund Programme 2021-2027, held between 04.07.2023 and 02.08.2023. [↑](#footnote-ref-29)
29. See : https://www.facebook.com/profile.php?id=100064275591566/ [↑](#footnote-ref-30)
30. Data from the Annual Report 2023 on the quality of implementation of the Asylum, Migration and Integration Fund referred to in Article 35 of Regulation (EU) 2021/1147 [↑](#footnote-ref-31)
31. Data provided by DMP. Facebook reach represents the number of unique users who see your post or page. [↑](#footnote-ref-32)
32. Interview Migration Directorate1, Interview SAR1 [↑](#footnote-ref-33)
33. Methodology for selection of operations [↑](#footnote-ref-34)
34. Project Monitoring Procedure, Annex 8 of the Management and Control System [↑](#footnote-ref-35)
35. Interview MS. [↑](#footnote-ref-36)
36. Interview Migration Directorate1 [↑](#footnote-ref-37)
37. Interview Migration Directorate1 [↑](#footnote-ref-38)
38. Interview Migration Directorate1, Interview SAR1 [↑](#footnote-ref-39)
39. Interview Migration Directorate1, Interview SAR1 [↑](#footnote-ref-40)
40. [migration-strategy-2021-25.pdf (mvr.bg)](https://eu-hr.mvr.bg/docs/librariesprovider79/%D0%B4%D0%BE%D0%BA%D1%83%D0%BC%D0%B5%D0%BD%D1%82%D0%B8/%D1%81%D1%82%D1%80%D0%B0%D1%82%D0%B5%D0%B3%D0%B8%D1%8F-%D0%BF%D0%BE-%D0%BC%D0%B8%D0%B3%D1%80%D0%B0%D1%86%D0%B8%D1%8F-2021-25.pdf?sfvrsn=75b3666_2) [↑](#footnote-ref-41)
41. In the report, interviews are presented with codes that correspond to the structure where the interview was conducted and the interview number. [↑](#footnote-ref-42)