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EVALUATION

Ex-post Evaluation for the Internal Security Fund - Borders and Visa (ISF-BV) for the 2014-2020 programming period

{SWD(2026) 76 final}

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Glossary

Term or acronym	Meaning or definition
AMIF	Asylum, Migration and Integration Fund
APR	Annual Performance Report
AWP	Annual Work Programme for Union Actions and Emergency Assistance
CSOs	Civil Society Organisations
DG BUDG	Directorate-General for Budget
DG HOME	Directorate-General Migration and Home Affairs
DG JUST	Directorate-General for Justice and Consumers
DG RTD	Directorate-General for Research and Innovation
DG TAXUD	Directorate-General for Taxation and Customs Union
EBCG	European Border and Coast Guard
EBCGA/Frontex	European Border and Coast Guard Agency
EBF	External Borders Fund
EC	European Commission
EIBM	European Integrated Border Management
EMAS	Emergency Assistance
EP	European Parliament
ETIAS	European Travel Information and Authorisation System
EU	European Union
eu-LISA	European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice
EUROPOL	European Union Agency for Law Enforcement Cooperation
EUROSUR	European Border Surveillance system
ILO	Immigration Liaison Officers
IOM	International Organisation for Migration

ISF	Internal Security Fund
ISF-BV	Internal Security Fund – Borders and Visa
ISF-P	Internal Security Fund - Police
MFF	Multiannual Financial Framework
MS	Member States
Participating countries	EU Member States participating in the ISF-BV (all Member States but Ireland and the then member United Kingdom) and the Schengen Associated Countries (Iceland, Liechtenstein, Norway and Switzerland.)
RA	Responsible Authority, the authority in charge of implementing the national programmes
SACs	Schengen Associated Countries (Iceland, Liechtenstein, Norway and Switzerland)
SIS	Schengen Information System
ToR	Terms of Reference
UA	Union Action
UNHCR	UNHCR United Nations High Commissioner for Refugees
VIS	Visa Information System

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1 INTRODUCTION

The instrument for financial support for external borders and visa (hereafter, "the ISF-BV" or "the Instrument" or "the Fund"), established by Regulation (EU) No 515/2014 ([1]) of the European Parliament and of the Council (henceforward, the "ISF-BV regulation") applied as from 1 January 2014.

The general provisions concerning the implementation of the three Home Affairs instruments for the period 2014-2020 (AMIF ([2]), ISF-BV and ISF-P ([3]) together also known as the "Home Affairs Funds") were laid down in Regulation (EU) No 514/2014 of the European Parliament and of the Council ([4]) ("the Horizontal Regulation"). According to article 57 of the Horizontal Regulation, on the basis of the ex-post evaluation reports submitted by the participating countries on their national programmes by 31 December 2023, the Commission is to submit an ex-post evaluation report of each instrument to the European Parliament, to the Council, to the European Economic and Social Committee and to the Committee of the Regions by 30 June 2024.

The deadline of 30 June 2024 was extended by one year through the amendment of the Horizontal Regulation ([5]), following the Russian war of aggression against Ukraine on 24 February 2022. The amendment extended the implementation of ISF-BV, as well as of the Internal Security Fund – Police ([6]) and the Asylum, Migration and Integration Fund ([7]) (hereinafter, also jointly as the "Home Affairs Funds"), by one year, to allow the Member States to fully use any unspent amounts from their national programmes, and, where necessary, to swiftly revise the implementation of their programmes to address the challenges arising from the invasion of Ukraine by the Russian Federation.

([1]) Regulation (EU) No 515/2014 of the European Parliament and of the Council of 16 April 2014 establishing, as part of the Internal Security Fund, the instrument for financial support for external borders and visa and repealing Decision No 574/2007/EC, OJ L 150, 20.5.2014, pp. 143–167, ELI: http://data.europa.eu/eli/reg/2014/515/oj.

([2]) Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund. OJ L 251, 15.7.2021, pp. 1–47, ELI: http://data.europa.eu/eli/reg/2021/1147/oj.

([3]) Regulation (EU) No 513/2014 of the European Parliament and of the Council of 16 April 2014 establishing, as part of the Internal Security Fund, the instrument for financial support for police cooperation, preventing and combating crime, and crisis management and repealing Council Decision 2007/125/JHA. OJ L 150, 20.5.2014, pp. 93–111. ELI: http://data.europa.eu/eli/reg/2014/513/oj

([4]) Regulation (EU) No 514/2014 of the European Parliament and of the Council of 16 April 2014 laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management. OJ L 150 20.5.2014, p. 112, ELI: http://data.europa.eu/eli/reg/2014/514/2022-04-12.

([5]) Regulation (EU) 2022/585 of the European Parliament and of the Council of 6 April 2022 amending Regulations No 514/2014 laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management, (No) 516/2014 establishing the Asylum, Migration and Integration Fund and (EU) 2021/1147 establishing the Asylum, Migration and Integration Fund. OJ L 112, 11.4.2022, pp. 1–5. ELI: http://data.europa.eu/eli/reg/2022/585/oj

([6]) Regulation (EU) No 513/2014.

([7]) Regulation (EU) No 516/2014 of the European Parliament and of the Council of 16 April 2014 establishing the Asylum, Migration and Integration Fund, amending Council Decision 2008/381/EC and repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council Decision 2007/435/EC, OJ L 150, 20.5.2014, p. 168-194, ELI: http://data.europa.eu/eli/reg/2014/516/2022-04-12.

As defined in the Evaluation Framework for the Home Affairs Funds ([8]), and in line with Better Regulation provision, the evaluation, grounded in the legal provisions of the Horizontal Regulation ([9]), should report on the achievement of the specific objectives of the ISF-BV and cover the following evaluation criteria: **effectiveness**, **efficiency**, **Simplification and reduction of administrative burden**, **coherence**, **complementarity**, **EU added value, relevance** and **sustainability ([10])**.

The evaluation covers the entire implementation period of the ISF-BV, that is, from January 1, 2014, to June 30, 2024 ([11]). It encompasses all Member States (except Denmark, Ireland and the United Kingdom (which ceased to be a Member State on 31 January 2020) ([12]) as well as the Schengen associated Countries (Norway, Iceland, Switzerland, and Liechtenstein, hereinafter also referred to as the "SACs").In addition, third countries where the ISF-BV supported actions are implemented and which are impacted by funded activities are also considered through targeted interviews and documentary review (where relevant).

The material scope of the evaluation covers activities under the three existing management modes: shared management, direct management and indirect management.

The evaluation is structured around the key evaluation questions listed in Annex II of Commission Delegated Regulation 2017/207 (Table 1). These questions guide the analysis of the Instrument's performance, ensuring a comprehensive assessment of its implementation and impact.

Table 1 - Main Evaluation Questions

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

([8]) Commission Delegated Regulation (EU) 2017/207 of 3 October 2016 on the common monitoring and evaluation framework provided for in Regulation (EU) No 514/2014 of the European Parliament and of the Council laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management. OJ L 33, 8.2.2017, pp. 1–13. ELI: http://data.europa.eu/eli/reg_del/2017/207/oj.
([9]) Article 57 of the Horizontal Regulation.
([10]) Annex II of Commission Delegated Regulation 2017/207. OJ L 33, 8.2.2017, pp. 1–13, http://data.europa.eu/eli/reg_del/2017/207/oj.
([11]) The implementation period of the Home Affairs Funds 2014-2020 (including of the ISF-BV) was extended in 2022 by 1 year (from 30 June 2023 to 30 June 2024) to allow the Member States to fully use any unspent amounts from those programmes, and, where necessary, to swiftly revise the implementation of their programmes to address the challenges arising from the invasion of Ukraine by the Russian Federation on 24 February 2022 (See Regulation (EU) 2022/585 amending Regulation(EU) No 514/2014).
([12]) The ISF-BV Regulation is based on legal bases under Title V of Part Three TFEU, concerning the area of freedom, security and justice. It constitutes a development of the Schengen *acquis*. As a consequence, in accordance with Article 1 and 2 of Protocol No. 22, and without prejudice to Article 4 of that Protocol, the application of the ISF-BV Regulation to Denmark is subject to the provisions laid down in Protocol No 22 annexed to the TEU and the TFEU. In accordance with Council Decision 2002/192/EC, the United Kingdom and Ireland are not bound by nor subject to the application of ISF-BV Regulation.

	How did the Fund contribute to the following specific objectives: Supporting integrated border management, including promoting harmonisation of border management-related measures in accordance with common Union standards and through the sharing of information between MS and between MS and the European Agency for the Management of Operational Cooperation at the External Borders of the MS of the EU? Ensuring, on one hand, a uniform and high level of control and protection of the external borders, including by the tackling of illegal immigration and, on the other hand, the smooth crossing of the external borders in conformity with the Schengen *acquis*, while guaranteeing access to international protection for those needing it, in accordance with the obligations contracted by the MS in the field of human rights, including the principle of non-refoulement?
Efficiency	Were the general objectives of the Fund achieved at reasonable cost?
Relevance	Did the objectives of the interventions funded by the Fund correspond to the actual needs?
Coherence	Were the objectives set in the national programme Fund coherent with the ones set in other programmes funded by EU resources and applying to similar areas of work?
	Was the coherence ensured also during the implementation of the Fund?
Complementarity	Were the objectives set in the national programme and the corresponding implemented actions complementary to those set in the framework of other policies, in particular those pursued by the Member State?
EU Added Value	Was any value added brought about by the EU support?
Sustainability	Are the positive effects of the projects supported by the Fund likely to last when the support from the Fund will be over?
Simplification and reduction of administrative burden	Were the Fund management procedures simplified, and the administrative burden reduced for its beneficiaries?

1.1 Methodology

The evaluation is mostly based on an external study, which applied a mixed-method evaluation approach, incorporating both quantitative and qualitative research techniques. The methodological approach included:

- Desk Research
- Financial and Quantitative Analysis
- Stakeholder Consultation
- Interviews with key stakeholders, including European Commission officials, Member State representatives, and Frontex
- Targeted Surveys of national authorities, implementing bodies, and beneficiaries
- Case Studies on selected Member States (both country case and thematic case studies)
- Public Consultation

More detailed information is avaiable in Annex II.

1.2 Limitations

The evaluation faced challenges related to data quality, availability, and consistency across Member States. Differences in the level of detail of Final Implementation Reports (FIRs) and national ex-post evaluations made cross-country comparisons difficult. In some cases, historical data gaps hindered the ability to evaluate developments in border management and visa policy throughout the evaluation period. Additionally, survey participation rates varied, affecting the representativeness of stakeholder feedback, while differences in the interpretation of evaluation indicators by the Responsible Authorities in the participating countries introduced inconsistencies in reporting.

To address these challenges, the study applied triangulation methods, cross-referencing multiple sources and using alternative indicators where primary data was incomplete. Interviews with stakeholders clarified discrepancies, while statistical analysis, including regression models, helped validate financial and operational data. While minor inconsistencies in SFC ([13]) data remained, no major errors were identified. Despite these challenges, the evaluation provides a comprehensive assessment of the ISF-BV's effectiveness, efficiency, simplification and reduction of administrative burden, coherence, complementarity, EU added value, relevance, sustainability of the Instrument, and broader impact, ensuring well-founded conclusions for future policy and funding decisions.

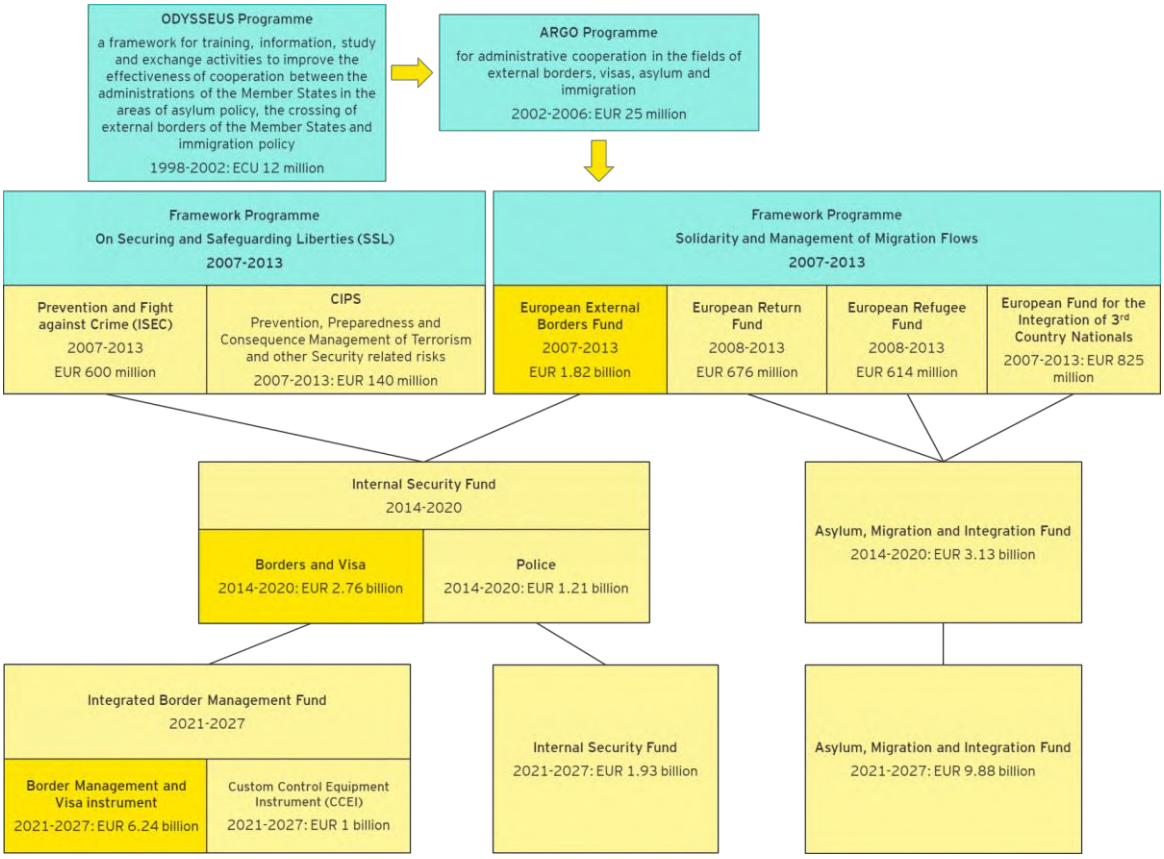
2 WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

2.1 Policy context and development

The common management of external borders and visas in Europe is **fundamentally intertwined with the creation of the Schengen area**. The signature of the Schengen Agreement in 1985 was indeed the first step towards an **EU common policy** for managing external borders, which became part of the EU legislative framework in 1999. The box below presents the main stages in the development of EU support to the Home Affairs Area.

([13]) SFC is the IT system for the programming, implementation and reporting of shared fund management in the European Union.

Figure 1 - Policy context



The Schengen Area aims to allow for traveling without checks within its internal borders with the goal of ensuring unrestricted travel for over 425 million EU citizens, as well as non-EU citizens legally residing or visiting the EU for various purposes, such as tourism, education, or business. This freedom of movement allows any EU citizen to easily travel, work, and reside in any EU country. The Schengen *acquis* aims at facilitating this by allowing people to move within the area without border control at the internal borders ([14]).

In these regards, the Schengen *acquis* has thus contributed to:

a. Establishing a single set of rules for external border checks on persons, through:

- The **Schengen Borders Code ([15])**, which sets out rules on crossing EU borders – both internal and external, including border control, border check and border surveillance of the Members States of the Union and those of the Schengen Associated Countries (SACs), facilitating entry for those with legitimate reasons to enter the EU, and
- A **common visa policy**, ensuring consistent guidelines for legal entry of non-EU nationals subject to Schengen visa to the EU for short stays (up to 90 days in any 180-days period).

([14]) Schengen Area - European Commission (europa.eu).
([15]) Regulation (EU) 2016/399 of the European Parliament and of the Council of 9 March 2016 on a Union Code on the rules governing the movement of persons across borders (Schengen Borders Code) (codification). OJ L 77, 23.3.2016, pp. 1–52. ELI: http://data.europa.eu/eli/reg/2016/399/oj

b. Increasing security for citizens and travelers, through a variety of large-scale IT systems, meant to become interoperable among each other, and namely:

- **Schengen Information System (SIS),** which, since 1995, constitutes the cooperative system used to manage security and border management in Europe. It allows each participating State to share information, biometrics, return decisions and issue alerts, for instance regarding terrorism offences.
- **Visa information System (VIS),** which, since 2004, has allowed Schengen States to exchange visa data. It is a central IT system and a communication infrastructure linking the central system to national systems.
- Two additional information systems, which have been designed in such a way that they already present a degree of interoperability between themselves and with the VIS, are expected to start operating shortly: the **Entry/Exit System (EES),** an automated IT system for registering travellers from third countries, initially scheduled to commence operations in the latter half of 2024, and the **European Travel Information and Authorisation System (ETIAS),** an IT system designed to identify security risks, irregular migration, or high epidemic risks posed by visa-exempt visitors, initially expected to launch in mid-2025.

Since the end of the 1990s, various funding programmes have been implemented to support the Member States in the development of an integrated border and visa management system:

The **ODYSSEUS** Programme (1998-2002) ([16]) was made to establish a framework for training, information, study and exchange activities to improve the effectiveness of cooperation between the administrations of the Member States in the areas of asylum policy, the crossing of external borders of the Member States and immigration policy. With this first multiannual programming, it aimed to extend this cooperation to non-member countries applying for accession.

The **ARGO** Programme (2002-2006) ([17]) had three objectives: to promote cooperation between national agencies responsible for implementing Community rules and to ensure that proper account is taken of the Community dimension in their actions; to promote the uniform application of Community law; and to increase the transparency and overall effectiveness of the actions taken by the national authorities.

The **External Borders Fund** (EBF) ([18]), part of the Framework Programme, "Solidarity and Management of Migration Flows" for the period 2007-2013, was the first dedicated EU financial programme that supported external border management in the EU. With EUR 1.82 billion over the period 2007-2013, its objective was to promote burden-sharing

([16]) Joint Action 98/244/JHA of 19 March 1998 adopted by the Council on the basis of Article K.3 of the Treaty on European Union, introducing a programme of training, exchanges and cooperation in the field of asylum, immigration and crossing of external borders (Odysseus programme) - (1998-2002). OJ L 99, 31.03.1998. ELI: http://data.europa.eu/eli/joint_action/1998/244/oj

([17]) Council Decision 2002/463/EC of 13 June 2002 adopting an action programme for administrative cooperation in the fields of external borders, visas, asylum and immigration (ARGO programme). OJ L 161, 19.6.2002, pp. 11–15. ELI: http://data.europa.eu/eli/dec/2002/463/oj

([18]) Decision No 574/2007/EC of the European Parliament and of the Council of 23 May 2007 establishing the External Borders Fund for the period 2007 to 2013 as part of the General programme "Solidarity and Management of Migration Flows". OJ L 144, 6.6.2007, pp. 22–44. ELI: http://data.europa.eu/eli/dec/2007/574/oj.

between Member States. It aimed to support the efficient organisation of control of and the management of the flows of persons at external borders ([19]), as well as the management of consular services.

In an effort by the Commission to rationalise the number of distinct funds and facilitate the administrative management of beneficiaries, the **EBF was repealed by the Internal Security Fund** (ISF) for the programming period 2014-2020. The ISF was composed of two instruments, one of which the **"Borders and Visas" component** (ISF-BV). The ISF-BV general objective was to contribute to ensuring a high level of security in the Union while facilitating legitimate travel, through a uniform level of control of the external border and the effective processing of Schengen visas.

The **Border management and visa policy instrument ([20])** (BMVI) for the programming period 2021-2027 is part of the Integrated Border Management Fund (IBMF) forming a comprehensive framework for EU financial support in the filed of border manamgent and visa policy comprising the BMVI and the Customs Control Equipment Instrument (CCEI) ([21]). The BMVI aims to support Member States (i) in strengthening an effective European integrated border management at the external borders, to faciliate legitimate border crossing, to prevent and detect illegal immigration and cross-border crime and to effectively manage migratory movements; (ii) in the implementation of the common visa policy to ensure an harmonised approach in the issuance of visas and in facilitating legitimate travel.

2.2 The ISF-BV (2014-2020)

To achieve its objectives, the ISF-BV was implemented through the three methods of Union budget implementation: shared, direct and indirect management. Under **shared management**, national authorities were responsible for overseeing a significant portion of the funding, following guidelines set at the EU level. Under **direct management**, the ISF-BV budget was allocated to Union actions as referred to in Article 13 of ISF-BV regulation, to Emergency Assistance referred to in Article 14 of that regulation and to the technical assistance referred to in Article 16(1) of that regulation. Union actions and Emergency Assistance were also implemented, where appropriate, under **indirect management,** by entities entrusted by the Commission with budget implementation tasks.

This structure enabled a flexible and coordinated response to the evolving challenges in border security and visa policy across the EU.

Article 3 of regulation 515/2014 sets out the general and specific objectives of ISF-BV. Its **general objective** is to "contribute to ensuring a high level of security in the Union while facilitating legitimate travel, through a uniform and high level of control of the

([19]) Article 3(1), (i) of Decision No 574/2007/EC

([20]) Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy. OJ L 251, 15.7.2021, pp. 48–93. ELI: http://data.europa.eu/eli/reg/2021/1148/oj

([21]) Regulation (EU) 2021/1077 of the European Parliament and of the Council of 24 June 2021 establishing, as part of the Integrated Border Management Fund, the instrument for financial support for customs control equipment. OJ L 234, 2.7.2021, pp. 1–17. ELI: http://data.europa.eu/eli/reg/2021/1077/oj

external borders and the effective processing of Schengen visas, in compliance with the Union's commitment to fundamental freedoms and human rights" ([22]).

Within the general objective, the ISF-BV pursued two **specific objectives (SO)** ([23])**:**

SO1: Supporting a common visa policy to facilitate legitimate travel, provide a high quality of service to visa applicants, ensure equal treatment of third-country nationals and tackle illegal immigration;

SO2: Supporting integrated border management, including promoting further harmonisation of border management-related measures in accordance with common Union standards and through the sharing of information between Member States and between Member States and the Frontex Agency. It aims to ensure, on one hand, a uniform and high level of control and protection of the external borders, including by the tackling of illegal immigration and, on the other hand, the smooth crossing of the external borders in conformity with the Schengen *acquis*, while guaranteeing access to international protection for those needing it, in accordance with the obligations contracted by the Member States in the field of human rights, including the principle of *non-refoulement*.

The ISF-BV supported a range of activities designed to strengthen border surveillance, enhance risk analysis capabilities, and modernise information-sharing mechanisms. Funding was allocated to the development and maintenance of large-scale EU security systems, including the Schengen Information System and the Visa Information System. Investments were also made in border control equipment, ICT infrastructure, and personnel training to ensure harmonised and efficient border management across Member States. Additionally, the ISF-BV sought to improve cooperation between border authorities, foster intelligence-sharing, and enhance operational coordination with Frontex. These measures were expected to lead to more effective border controls, a more efficient and harmonised visa policy, and an overall reduction in security vulnerabilities at the Union external borders.

2.3 Points of comparison

Comparison with the External Borders Fund (EBF)

Prior to the establishment of the Visa ISF-BV in 2014, the Union external border management was supported by the External Borders Fund ([24]) (EBF) (2007–2013). The EBF was created as the Union's first funding instrument for borders, launched in 2007 under the Solidarity and Management of Migration Flows (SOLID) framework. It formed part of a broader policy package alongside measures such as the Frontex Agency and the Schengen Borders Code. Backed by a budget of EUR 1.82 billion, the EBF's aim was to enhance the control and management of movements across the external borders, harmonise the application of EU rules on border crossings, and strengthen the organisation of consular activities. In practice, the EBF fully supported five priority objectives ([25]), including creating a common integrated border management system for the surveillance of the external borders, issuing visas and tackling illegal immigration, establishing the IT systems

([22]) Article 3 of ISF-BV regulation, paragraph 1.
([23]) Article 3 of ISF-BV regulation, paragraph 2.
([24]) Decision No 574/2007/EC of the European Parliament and of the Council of 23 May 2007.
([25]) Commission Decision 2007/599 /EC of 27 of August 2007 Implementing Decision No 574/2007/EC of the European Parliament and of the Council as regards the adoption of strategic guidelines for 2007 to 2013

required to implement EU border and visa legislation, and promoting the effective and efficient application of EU border and visa legislation. The EBF operated under shared management with Member States via annual national programmes, and it co-financed both national projects and certain transnational or "Community" actions managed directly by the European Commission. As highlighted in the preamble to the ISF-BV regulation and its proposal ([26]), a core rationale of the EBF was to express solidarity by financially assisting those Member States bearing the heaviest burden in controlling the EU's external frontiers. However, the EBF's scope was inherently bounded – focused mainly on border control and common visa policy – and it did not cover every emerging need in EU border management.

Transition to ISF-BV – structural and strategic shifts

The ISF-BV (2014–2020) was conceived as a successor that builds on the EBF's achievements while addressing its gaps. Legislatively, the ISF-BV was established as part of a new two-pillar Internal Security Fund structure, replacing the old SOLID funds. This two-pronged framework (one instrument for borders and visa, and a separate instrument for police cooperation) was explicitly designed to "contribute to the simplification, rationalisation, consolidation and transparency" of EU home affairs funding ([27]). In other words, whereas the EBF had been one of four parallel funds, the ISF-BV became one of two components under a unified Internal Security Fund, allowing for more coherent management. The new fund also introduced simplified implementation: under the EBF, each country implemented a multiannual strategy via annual programmes, an approach some found administratively heavy ([28]). In ISF-BV, this was streamlined into a single multiannual national programme for 2014–2020, which speeds up the funding process and decreases administrative burden by giving Member States more flexibility (e.g. use of national eligibility rules) ([29]). The Commission's proposal, as well as the preamble to the Horizontal Regulation highlighted the need for flexibility and user-friendliness, noting that the ISF should provide increased flexibility and simplification while ensuring a fair and transparent distribution of resources. In light of lessons from the EBF ([30]), the ISF-BV Regulation also allows a higher degree of financial flexibility, for instance permitting shifts of resources between various objectives/instruments to respond to new pressures (all while maintaining a stable core allocation for each national programme). Another structural change was the handling of specific actions: under the EBF, there were centrally managed community actions and specific projects overlapping with national efforts. ISF-BV abolished the separate specific-action funding at EU level and instead folded those actions into the regular national programmes, giving Member States more ownership and flexibility in using funds.

Expanded scope and priorities under ISF-BV

([26]) Proposal for a Regulation of the European Parliament and of the Council establishing, as part of the Internal Security Fund, the instrument for financial support for external borders and visa, EUbaR-Lex - 52011PC0750 - EN - EUR-Lex

([27]) Preamble to the Horizontal Regulation.

([28]) COMMISSION STAFF WORKING DOCUMENT Interim Evaluation of the Internal Security Fund - Borders and Visa 2014-2017 Accompanying the document Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on interim evaluation of the Asylum, Migration and Integration Fund and the Internal Security Fund

([29]) Ibid.

([30]) Interim Evaluation of the Internal Security Fund - Borders and Visa 2014-2017, EUR-Lex - 52018SC0340 - EN - EUR-Lex

Substantively, the ISF-BV broadened the scope of Union border funding beyond what the EBF covered. The new instrument "builds on the capacity-building process developed with the assistance of the External Borders Fund […] and extends it to take into account new developments" ([31]). Notably, as highlighted in the 2018 interim evaluation ([32]) of the Instrument, ISF-BV addressed a number of needs that the EBF could not meet. These included bolstering the development of the common integrated border management system (IBM) and enhancing capacities for the European Border Surveillance System (EUROSUR), as well as ensuring the sustainability of large-scale IT systems for borders and visas. The EBF had supported initial steps in these areas, but some components, such as advanced information systems and certain internal security measures fell outside its remit. The ISF-BV explicitly set out to fill those gaps, financing new IT initiatives, such as the Entry-Exit System (EES), the Registered Traveller Programme (RTP), and the ongoing operation of second-generation systems like SIS II (Schengen Information System II) and the VIS (Visa Information System). It also enabled support for control measures within the area of free movement inside Schengen and greater inter-agency cooperation among national authorities under an internal security agenda.

In sum, ISF-BV's mandate went beyond the external border perimeter focus of EBF, recognizing that border security links with domestic security and requiring a more holistic approach. ISF-BV covers a broader range of activities than the EBF, which focused primarily on border control and visa policy. It enables the Union to support controls within the Schengen area and to foster cooperation between agencies operating within Member States' territories – areas that were not addressed under the EBF. As the Commission's proposal put it, the new instrument aimed "to support more systematically the services provided by individual Member States in securing the border-free area ('operating support mechanism'), to enhance interagency cooperation between border and other law enforcement authorities and to increase the available specialised equipment […] for joint operations" ([33]). This operating support mechanism was a significant innovation of ISF-BV - it provides full reimbursement of a choice of specific costs (e.g. staffing, maintenance or training costs) related to border control and visa management, forming an integral part of each national programme. The EBF, by contrast, had more restrictive eligibility and did not systematically fund ongoing operational costs of border agencies. By helping countries cover such expenditures, ISF-BV reinforced the principle that when a Member State guards the Union's external border or processes visas, it carries out activities in the interest of and on behalf of all other Member States, performing a public service for the Union – and thus deserves tangible burden-sharing support, as expressed in the strategic priorities within the Commission's proposal ([34]).

Comparative insights – funding and solidarity

In financial terms, the ISF-BV represented a major increase in resources and ambition compared to the EBF. Initially, EUR 2.76 billion were allocated for all management modes, reaching a total allocation of EUR 2.9 billion at the end of the programming period. Thereof, total allocations to Member State programmes, including national contributions, reached EUR 2.42 billion by the end of the implementation period in June 2024, 33% more than the amount of its predecessor's EUR 1.82 billion envelope. This higher funding level

([31]) Preamble to the Horizontal Regulation.
([32]) COM(2018) 464 final
([33]) Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing, as part of the Internal Security Fund, the instrument for financial support for external borders and visa, EUR-Lex - 52011PC0750 - EN - EUR-Lex
([34]) Ibid.

reflected the broader scope (e.g. expensive IT system rollouts) and the Union's heightened focus on internal security and migration challenges in that period. The ISF-BV also adjusted how funds were distributed to enhance solidarity and fairness. For instance, under EBF smaller Member States or those with relatively low allocations struggled with disproportionately high management costs, whereas ISF-BV set a minimum threshold, so that each Member State is allocated a more appropriate amount of funding, relative to its needs, and it slightly increased the portion of funds for technical assistance to mitigate fixed costs. Furthermore, to encourage investments that had seen limited uptake under EBF, such as joint consular cooperation for visa issuance abroad, ISF-BV introduced a higher co-financing rate – up to 90% Union funding for certain national actions – making it more attractive for Member States to pursue those collaborative projects ([35]).

Overall, the design of ISF-BV carried forward the EBF's central objective of shared responsibility for external border management, but with a more flexible, well-resourced and comprehensive toolkit. Recital (34) of the Regulation (EU) No 514/2014 explicitly acknowledges that in light of the experience gained with the External Borders Fund it is considered appropriate to introduce more flexibility in the new Instrument's implementation. In summary, the transition from EBF to ISF-BV involved a qualitative leap in the EU's approach – streamlining funding structures, expanding policy coverage, boosting the available budget, and strengthening mechanisms to support Member States on the front line of the Union's external borders.

Key points of comparison

	EBF (2007–2013)	ISF-BV (2014–2020)
Policy Context and Objectives	Part of a solidarity-driven framework to support Schengen external borders, with €1.82 billion devoted to five core priorities (integrated border management, EUROSUR development, visa processing, IT systems, and enforcing common border/visa rules).	Built on EBF's foundation, continuing the goal of a common integrated border management system, while extending it to new developments in border security and visa policy.
Structure and Management	One of four separate funds under the SOLID programme, implemented through annual national programmes under shared management.	In contrast, ISF-BV was established as one of two instruments under the Internal Security Fund, a new two-pillar structure intended to simplify and consolidate home affairs funding. ISF-BV introduced a single multiannual programme per Member State (2014–2020) instead of yearly programming, speeding up the funding process and decreasing administrative burden for national authorities.

([35]) Interim Evaluation of the Internal Security Fund - Borders and Visa 2014-2017, EUR-Lex - 52018SC0340 - EN - EUR-Lex

Scope of Support	Limited to external border control and common visa policy, focusing on infrastructure, equipment, and basic systems at the border crossing points.	Broader scope, supporting measures within the area of free movement and inter-agency cooperation. New priority areas under ISF-BV included funding cutting-edge IT systems and sustaining existing large-scale databases (e.g. SIS II, VIS) that the EBF did not fund. ISF-BV could also fund operational costs like border guard staffing, which were generally ineligible under the EBF.
Funding Level and Solidarity Mechanisms	• EUR 1.82 billion envelope. • No equivalent ongoing cost support. Issues of equal burden-sharing	• Total allocations to national programmes, including national contributions, reached EUR 2.42 billion by the end of the implementation period in 2024. • Both funds sought to spread responsibility fairly for protecting the Schengen area, but ISF-BV introduced enhanced solidarity tools. It offers an operating support scheme with full reimbursement of certain costs to help frontline Member States maintain key capabilities. • Minimum national funding allocations and higher co-financing rates (up to 90%) for strategic priorities (such as joint consular services).

Beyond addressing its overarching needs, the ISF-BV fund also aimed to address and tackle specific needs and priorities that EBF was unable to fully address, as well as new needs that emerged due to the new policy developments and external factors outlined above. These needs were identified in the impact assessment accompanying the proposal for the Home Affairs Funds in 2014-2020, the Regulation (EU) No 515/2014 establishing the ISF-BV, Member States' annual implementation reports, and further confirmed by the stakeholders consulted as part of the mid-term and final evaluation of ISF-BV.

2.4 Intervention logic

The intervention logic shows the overall general, specific and operational objectives, as well as the expected results and impacts of the Instrument.

A detailed **intervention logic** is provided in Annex II.

The intervention logic includes the following components.

Needs: The original needs which the Instrument set out to address are established in the preamble to the Regulation and give rise to the Instrument objectives (see section 2.2.1, as well as section 4.1.1 on how this will be further developed).

General objectives: these correspond to the overall objectives of the ISF-BV as expressed in its legal basis (Article 3(1) of ISF-BV regulation).

Specific objectives: the specific objectives relate to the two themes of visa policy and border management covered by the ISF-BV. The specific objectives reflect the intended outcomes that are expected through the ISF-BV funding according to Article 3(2) points (a) and (b) of ISF-BV regulation. These are essentially the two core policy areas the Instrument addresses.

Operational objectives: these are laid down in Article 3 of Regulation (EU) No 515/2014 paragraph 3 and correspond to the immediate outputs of the ISF-BV, i.e. the various actions implemented by projects funded and implemented through shared, direct and indirect management. Expected outputs can be measured through quantitative indicators that have been defined in the annex IV of Regulation (EU) No 515/2014: they mainly relate to the number of operations for each type of action.

Eligible actions: these correspond to the (types of) eligible actions supported through the ISF-BV as laid down in Article 4 of ISF-BV regulation.

Outputs: The expected outputs are short-term results which can be assessed through quantitative indicators (defined in the Annex IV of ISF-BV regulation).

Results: The expected intermediate outcomes are typically less easy to quantify but are the medium-term intended effects of the intervention. Indicators for expected results for each specific objective are listed in the Annex IV of ISF-BV regulation.

Impact: the impact of the ISF-BV is the contribution of the funding delivered to the policy objective (assessed over the long run).

3 HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD?

Evolving context and needs throughout the implementation of ISF-BV (2014-2020)

In 2018, the Commission published its interim evaluation of the ISF-BV, taking stock of the progress made by the instrument between 2014 and 2017. It concluded that **the overall needs identified during the programming stage in 2014 had not changed during the Fund's implementation;** rather, it was the volume of issues to be addressed that increased. Stakeholders consulted as part of this ex-post evaluation (including the focus group of national authorities, EU Agencies and International Organisations) highlighted similar findings, noting that external events/factors such as the migration crisis or the onset of the

COVID-19 pandemic had happened against a backdrop of stretched capacity, which further reinforced the overarching need for an Union financial mechanism to provide for solidarity and responsibility sharing between Member States and the Union in the management of external borders and visa.

External factors and policy changes that increased the need for ISF-BV between 2014-2020

- **The migration crisis (2014/2015):** Conflicts that began in the aftermath of the Arab Spring destabilised the Middle East and North Africa (MENA) region, culminating in the 2015 migrant crisis when over a million migrants and refugees crossed into Europe, representing the largest movement of people into Europe since World War 2. The crisis highlighted the need for stronger external border controls. Frontex was reinforced, new systems like EUROSUR were enhanced to improve surveillance and coordination, and Emergency Assistance was provided under ISF-BV to reinforce the Member States most in need. However, despite these efforts, the crisis exposed significant weaknesses in the EU's ability to maintain effective external border control and the sheer volume of arrivals overwhelmed existing systems, leading to gaps in security and processing capabilities.

- **COVID-19 pandemic:** Testing and quarantine requirements imposed to mitigate the spread of the virus significantly disrupted the movement of people within the EU. For instance, during the peak of the pandemic in 2020, Schengen visa applications plummeted by 83% compared to the previous year. This drastic reduction in visa applications reflected the severe impact of pandemic restrictions on regular travel across Europe. While irregular border crossings and the pressure on Member States decreased due to travel restrictions, they were not eliminated and posed a dual challenge of balancing public health safety with managing migration flows effectively. Moreover, the COVID-19 pandemic also resulted in delays in implementing actions planned under ISF-BV, which carried on and were considered in the development of BMVI and Member States' national programmes. The pandemic underscored the need for adaptive border management strategies to respond to evolving health crises while maintaining robust security measures and upholding international obligations.

- **Security Threats, including hybrid threats:** The EU experienced several high-profile terrorist attacks, including those in Paris (2015), Brussels (2016), and Berlin (2016). These attacks highlighted the persistent threat of both jihadist and right-wing terrorism. Moreover, between 2014 and 2020, organised crime groups continued to be a significant and increasing threat, involved in activities such as drug trafficking, human trafficking, and money laundering. There was also a notable increase in cyberattacks targeting critical infrastructure, financial systems, and government institutions.

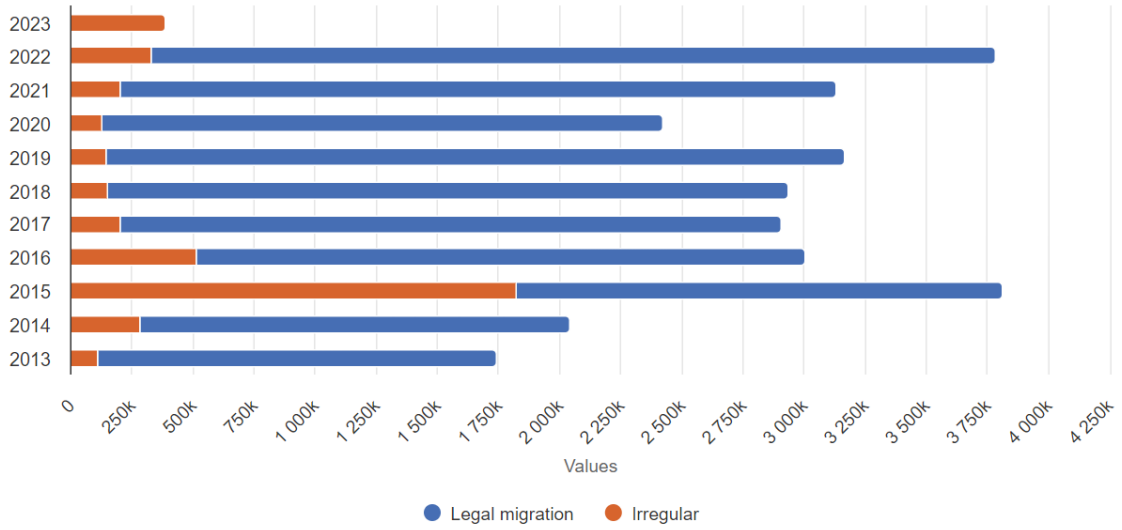
- **Policy changes:** Between 2014 and 2020, the Union implemented several significant policy changes in the area of border management and visa to address these emerging challenges. These included, among others, an amendment to the Schengen border codes in 2017 introducing systematic checks against relevant databases, updates to the rules on temporary internal border controls, enhanced border surveillance, including the use of advanced technology and increased cooperation between Member States.

Frontex Regulation was also amended in 2016, which saw the formalisation of integrated border management (which has since been developed further with the latest amendment in 2019) with the setting up of the European Border and Coast Guard (comprised of Frontex and the EU countries' authorities responsible for border management). The augmented mandate and tasks were geared towards providing the Agency with greater authority and resources to proactively manage borders and contribute to search and rescue efforts, rather than being reliant on voluntary contributions by the Member States.

Trends in border management and visa between 2015-2020

The number of irregular migrants entering the Union reached a peak in 2015, driven largely by the Syrian civil war and instability in neighbouring regions. Over 1.7 million irregular border crossings were detected in 2015 alone. While the number decreased in the following years, it remained higher than under EBF. The number of legal migrants also increased under the programming period 2014-2020 from 1.6 million in 2013 to 2.3 million in 2020, putting additional pressure on Member States' capacity to manage their external borders.

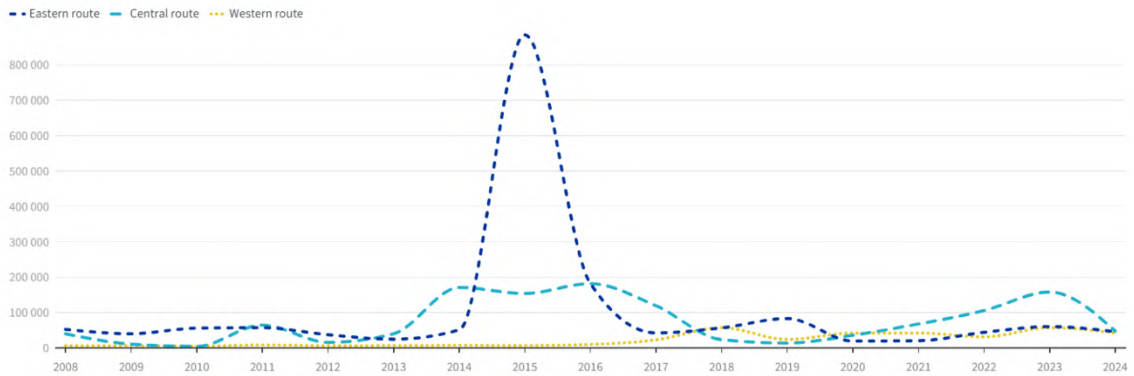
Figure 1 - Legal and irregular migration to the EU



Source: European Commission, Available at: Statistics on migration to Europe - European Commission

The main routes for irregular migration also continuously shifted over the years. Initially, the Eastern Mediterranean route (Turkey to Greece) was predominant, but later, the Central Mediterranean route (Libya to Italy), the Western Mediterranean route (Morocco to Spain) and the Western African route (to the Canary Islands) saw increased activity. These shifting migratory routes highlighted the need for a flexible, solidarity Union financial mechanism.

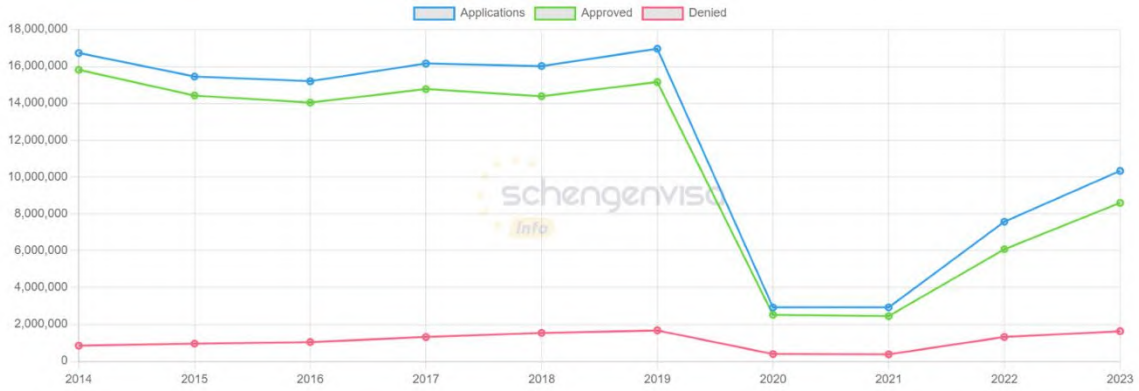
Figure 2 - Irregular arrivals to the EU - 2008-2024



Source: Council of the European Union, Available at: [Irregular arrivals to the EU - 2008-2024 - Consilium]

The number of visa applications between 2014 and 2019 remained high, with over 16 million applications yearly. There was a slight upward trend between 2014 and 2019, but it considerably dropped in 2020 as a result of the COVID-19 pandemic and its impact on international travel.

Figure 3 - Schengen Visa Application trends (2014-2023)



Source: European Commission, Schengen visa, Available at: [Overview of Schengen Visa Statistics (2014 – 2023)]

3.1 Overall description of the implementation set-up

The budgetary appropriations for the ISF-BV, as set in the in the ISF-BV regulation in 2014, amounted to EUR 2 760 million (calculated without the potential additional contributions from countries or international organisations for actions undertaken under indirect management).

Under **shared management**, EUR 1 705 million were planned for operations (including funding for national programmes and the Special Transit Scheme in Lithuania), equalling 61.8% of the total financial envelope.

For **direct management**, EUR 264 million (9.6% of the total envelope) were initially allocated covering Emergency Assistance, Union Actions and Technical Assistance

activities at the initiative of the Commission, with at least 30 % of this funding to be used for Union Actions.

Under **indirect management**, a financial envelope for actions was not included in ISF-BV regulation.

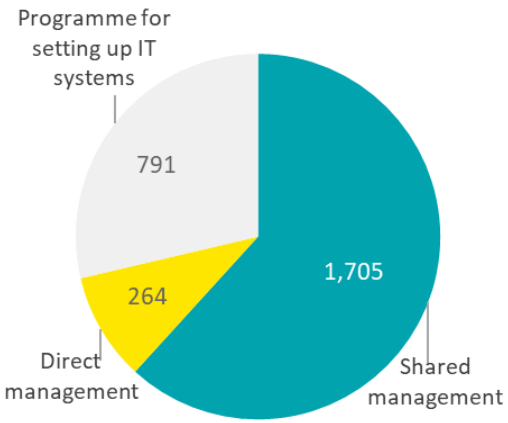
A total of EUR 791 million (28.7% of the total envelope) was set aside for the development and deployment of large-scale IT systems supporting the management of migration, European Travel Information and Authorisation System ETIAS, the Entry-Exit System (EES), upgrade of Schengen Information System SIS – and was not initially allocated to any management mode in the ISF-BV Regulation. The majority of this amount has later been implemented under **direct management**, leading to a more significant role of this management mode in terms of budgets. Out of this total amount:

- EUR 325.7 million was later distributed as top-ups to national programmes for the development of EES and ETIAS, as well as for SIS recast.

- EUR 64 million was re-allocated to other programme activities (national programmes, Union Actions, Emergency Assistance and technical assistance at the initiative of the Commission.

In the end, contributions to the ISF-BV for the period 2014-20 amounted to over **EUR 2 900 million** ([36]) for funding actions channelled through the different management modes, as the shown in the figure below.

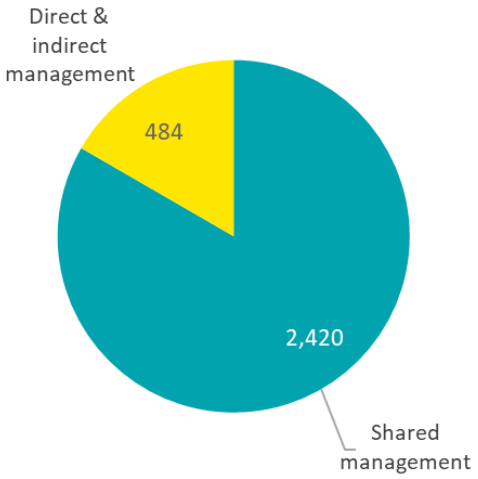
Figure 4 - Breakdown of initial EU contributions by management modes, as per the legal base



Source: Article 5 Regulation (EU) No 515/2014 ([37]). N.B.: the appropriation for the « Programme for setting up IT systems » has not been allocated to a specific management mode at the time of adopting the multi-annual financial framework.

[36] Initially, the total allocation for ISF-Borders and Visa (2014-20) was €2.76 billion.
([37]) ISF-BV regulation.

Figure 5 - Breakdown of EU contributions by management modes, as of final budget



Source: SFC2014, DG HOME Data

The table below presents the planned initial breakdown of EU contributions as set out in the legal basis. Amounts relevant for the Schengen associated countries' programmes were not included in the Regulation, as the international agreements for their participation to the programme were adopted later.

Table 2 - Detailed breakdown of initial EU contributions by management modes, as per the legal base

Management mode	EU contribution (EUR)	As % of total
Shared management	1 705 000 000	61.8
National programmes	1 551 000 000	56.2
Special Transit Scheme	154 000 000	5.6
Direct management	264 000 000	9.6
Union actions	At least 30% of the amount for direct management	
Emergency Assistance		
Technical assistance		
Indirect management	Not initially budgeted	-
Not initially allocated to management modes	791 000 000	28.7
Envelope for setting up IT systems supporting the management of migration flows across the external borders	791 000 000	28.7
TOTAL	**2 760 000 000**	**100.0**

Source: Article 5 Regulation (EU) No 515/2014

3.2 Shared Management

Altogether, the total allocations to national programmes, including national contributions, reached EUR 2 420 million by the end of the implementation period in 2024. This amount is broken down by specific objectives as follows:

Table 3 - Breakdown of national programme allocations by Specific Objective

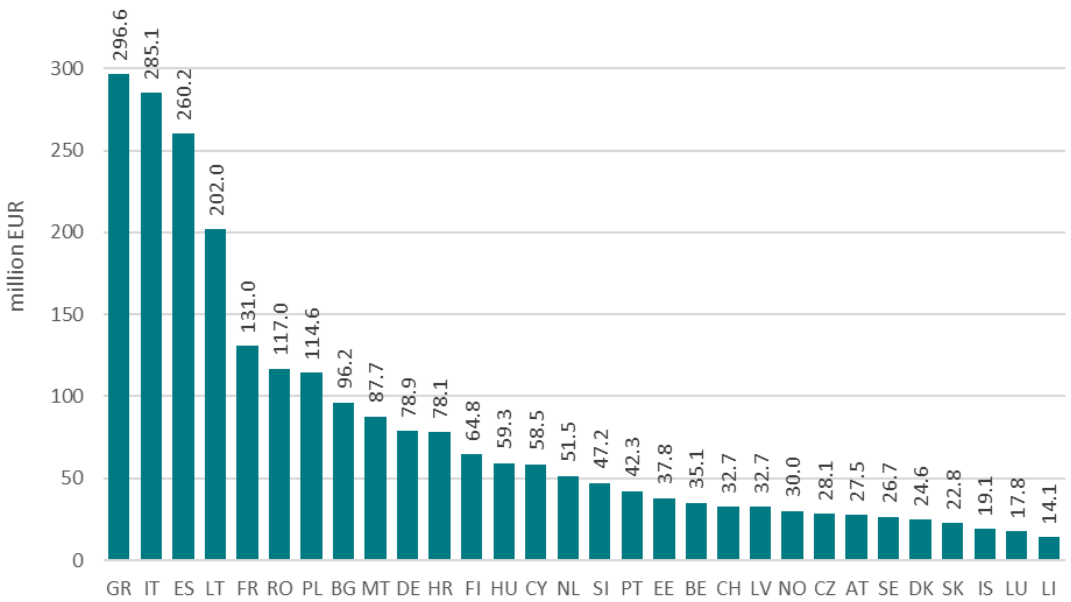
SO Code	Specific Objective description	Allocations (EUR million)	As % of total
SO1 – Common visa policy	Visa policy	152 923 358.49	6.3
SO2 – Integrated border management	Borders	1 617 137 529.81	66.9
SO3 – Operating Support	Operating Support	432 874 865.85	17.9
	Visa policy	68 235 902.50	2.8
	Borders	364 638 963.35	15.1
SO4 – Technical Assistance	Technical assistance - visa and borders	69 689 715.28	2.9
SO8 – Special Transit Scheme	Operating support for Special Transit Scheme (LT)	147 600 000	6.1
	Total	2 420 225 469.43	100.0

Source: European Commission - SFC2014 data

3.3 Implementation at the National Programme Level

In terms of total allocations to national programmes, **Greece (EUR 296 million), Italy (EUR 285 million), and Spain (EUR 260 million)** received the **highest levels of funding** reflecting their position on the external borders of the EU that are most severely exposed to pressures from irregular migration.

Figure 6 - Total allocations to national programmes (EUR millions)



Source: European Commission - SCF2014 data

Of the total budget allocated to National Programmes, **EUR 2 071 629 285.04** had been committed to concrete operations, and declared eligible expenditure (accounts) amounted

to **EUR 2 264 530 152.32**, as of final financial implementation data received from Member States in January 2025.

3.4 Initial steps in implementation

The Interim Evaluation of the ISF-BV (2014-2017) assessed the Instrument's initial performance and identified key achievements as well as areas requiring improvement. It found that implementation varied significantly across Member States, with some experiencing delays in deploying planned border management infrastructure. Financial and administrative tasks were also noted, as high administrative burden and complex funding procedures limited accessibility to the Instrument in some cases. The interim evaluation emphasised that while the ISF-BV contributed to improving the setup of large -scale IT systems and interoperability, further progress was needed to fully integrate national and EU-level border management systems.

One of the key challenges highlighted in the interim evaluation was the slow implementation of national programmes, which delayed the achievement of expected outcomes. Administrative complexity also posed difficulties, as different national rules hindered joint projects between Member States, and reporting and monitoring requirements were seen as burdensome. While the Instrument effectively supported border control infrastructure, IT systems, and training, its impact on consular cooperation remained limited due to delayed implementation. Additionally, Emergency Assistance was recognised as crucial for the Instrument's responsiveness, yet its efficiency required improvement. The evaluation emphasised the need for simplified administrative procedures, clearer reporting guidelines, and a more structured monitoring framework to enhance the ISF-BV's effectiveness.

By the end of the programming period, the ISF-BV was expected to have contributed to a more secure and resilient Union border management system, with enhanced capacities for detecting irregular migration and cross-border threats. The final evaluation assesses the extent to which these expectations were met and whether the ISF-BV successfully addressed the shortcomings identified in the interim evaluation.

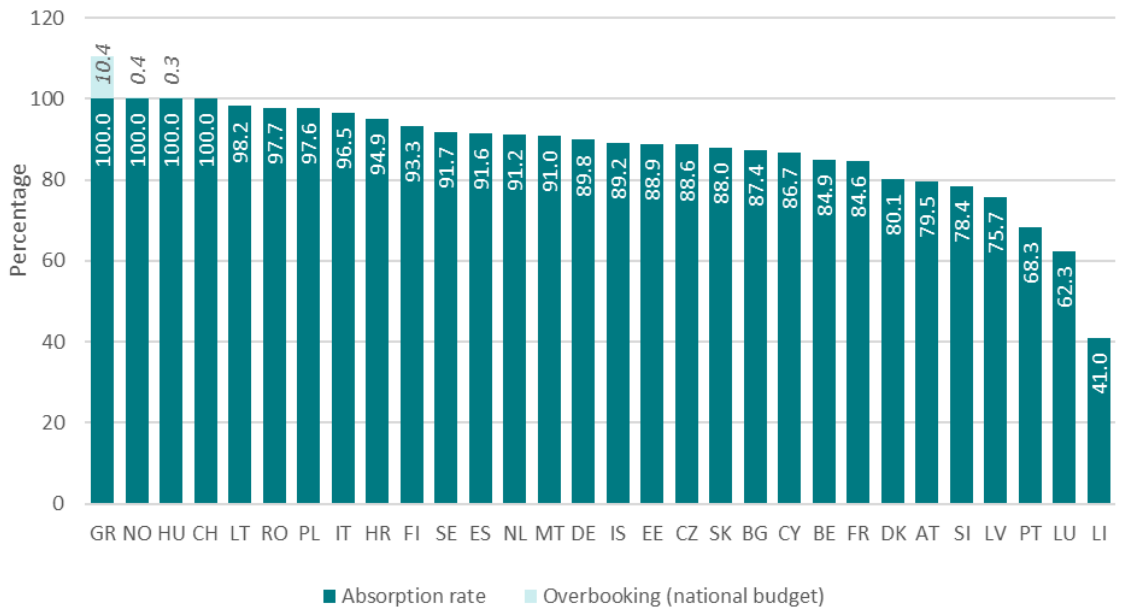
3.5 State of implementation at closure

In terms of **the Instrument effective implementation**, several participating countries ([38]) have very high **absorption rates** (the ratio of declared costs per budget allocations to the programme). According to the final budget allocation data received from the Commission, **Greece**, **Norway** and **Hungary had absorption rates over 100%**, i.e. committing to operations above initial funding ceilings, using additional national resources to cover the expenses. In Greece, for instance, due to the exhaustion of the available budget for Operating Support and the need to continue actions addressing inflexible needs, additional funding was provided through national resources ([39]). Most Member States and associated countries have **absorption rates between 80% and 100%** utilisation but **Austria, Slovenia, Latvia and Luxembourg have absorbed only 60-80% of their allocated funds,** and **Liechtenstein has the lowest absorption rate with** only 41%.

([38]) Through this paper, "participating countries" refers to both EU Member States and Schengen Associated Countries participating in ISF-BV.
([39]) Greek Annual Implementation Report (2021.1).

In terms of **the Instrument effective implementation**, several participating countries ([40]) have very high **absorption rates** (the ratio of declared costs per budget allocations to the programme). According to the final budget allocation data received from the Commission, the **absorption rate in Greece**, **Norway** and **Hungary has reached 100%**. They were in fact 'overbooking' their allocations, i.e. committing to operations above initial funding ceilings, using additional national resources to cover the expenses. In Greece, for instance, due to the exhaustion of the available budget for Operating Support and the need to continue actions addressing inflexible needs, additional funding was provided through national resources ([41]). Most Member States and associated countries have **absorption rates between 80% and 100%** utilisation but **Austria, Slovenia, Latvia and Luxembourg have absorbed only 60-80% of their allocated funds,** and **Liechtenstein has the lowest absorption rate with** only 41%.

Figure 7 - Absorption rates of national programmes on the basis of amounts declared for clearance in the final accounts



Source: European Commission - SCF2014 data ([42])

Further details on the utilisation and progress of implementation of the ISF-BV budget under the shared, direct and indirect management modes are provided in the next sections.:

([40]) Through this paper, "participating countries" refers to both EU Member States and Schengen Associated Countries participating in ISF-BV.

([41]) Greek Annual Implementation Report (2021.1).

([42]) The analysis on allocations reflects the National Programmes' structure, which consist of the II of Specific Objectives (Article 3 of Regulation (EU) 515/2014) into National Objectives, as defined within Article 9 of the same Regulation, which address the needs and priorities of the Member States in the areas covered by the Regulation in terms of activities to be funded and results to be achieved. The figures above 100 percent for Greece, Norway and Hungary correspond to amounts declared in excess to the total allocation in the final accounts. Those excess amounts are not reimbursed to the country.

4 EVALUATION FINDINGS

4.1 To what extent was the intervention successful and why?

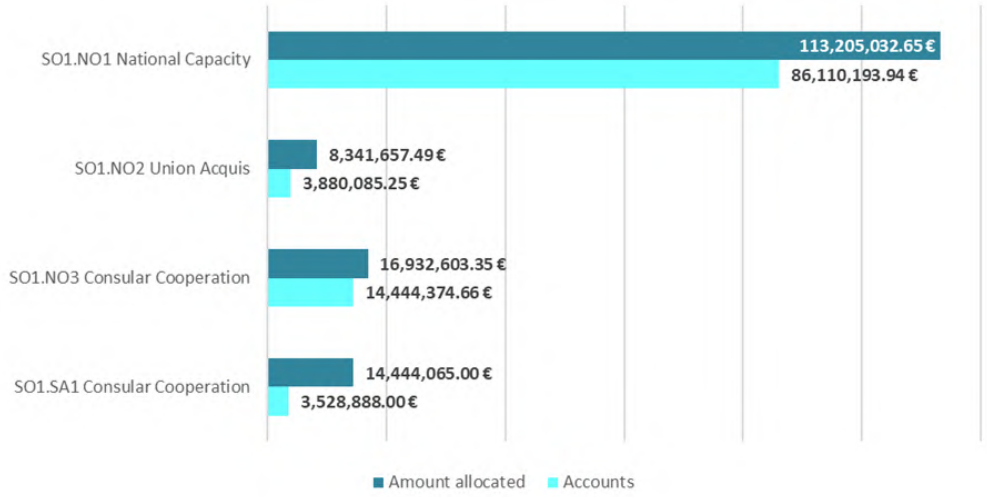
4.1.1 Effectiveness

The assessment of effectiveness evaluates the extent to which the ISF-BV has achieved its objectives and provides a basis for judging the role of Union action in driving the observed changes. The analysis identifies the extent of shortcomings and the factors contributing to the lack of success or delay. Furthermore, it examines the drivers and barriers to achievement and explores their connection to Union intervention.

How did the Instrument contribute to the achievement of the SO 1?

The ISF-BV contributed to the upgrading of consular infrastructure and visa issuance practices across Member States and associated countries. It also contributed to the implementation of the common visa policy. However, its role in driving the geographical expansion of consular presence was more limited.

Figure 8 - SO1 components' allocations & declared accounts



Source: European Commission - SCF2014 data

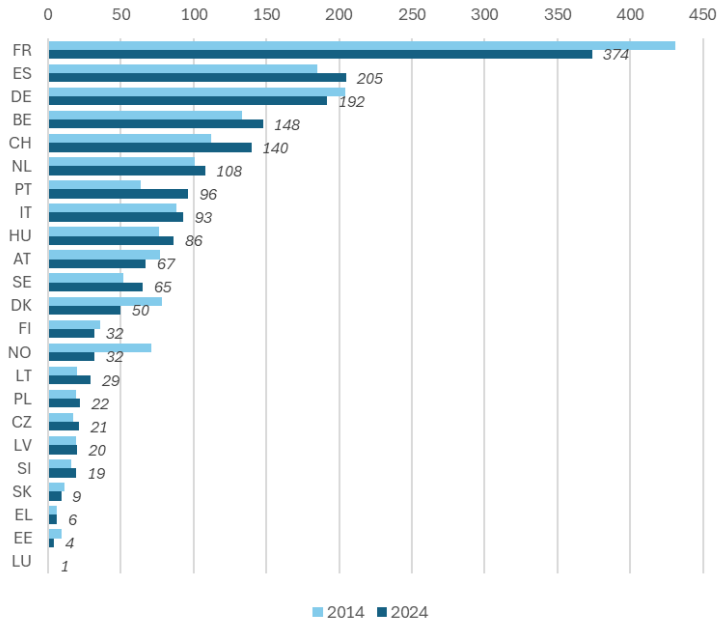
Ensuring better consular presence, harmonised practices in visa issuance and strengthening the implementation of the common visa policy

The ISF-BV supported these improvements to a large extent, as suggested by national implementation reports, ex-post evaluations of national programmes, survey data, and country case studies. The Instrument was particularly used to modernise consular offices through infrastructure and IT investments. In Romania, for instance, the ISF-BV contributed to the reconditioning of 130 consular offices, which, according to the country case study, led to better consular coverage and harmonised visa practices and more uniform visa processing standards across consular offices, ultimately improving service quality for visa applicants ([43]). Similar renovations were reported in France, Hungary, Malta, and

([43]) Romania – country case study

Portugal. These physical upgrades contributed to improved security, accessibility, and client experience, aligning with the ISF-BV common performance indicators ([44]).

Figure 9 - Number of consular representations provided by Schengen countries (location x country covered) (2014 and 2024)



In parallel to infrastructure upgrades, the Instrument supported the harmonisation of visa issuance practices, notably through training and modernisation of IT systems. Ex-post evaluation reports indicate that among the 13 Member States where harmonisation-related actions were identified, eight implemented training for consular staff. This covered document security, migration awareness, and Schengen visa rules, to promote consistent application of procedures and ensure equal treatment of applicants.

The modernisation of IT systems further facilitated the harmonisation of visa issuance practices across countries. The ISF-BV funding enabled the deployment of modern equipment in consulates, the alignment of security standards (especially in Member States that had recently joined the Schengen Area), and provided technical prerequisites for access to Schengen Information Systems. These actions further reinforced compliance with the Schengen *acquis* and enabled national systems to be interoperable with those of Schengen partners, ensuring a consistent and standardised visa issuance process across the participating countries. As a positive side effect, ex-post evaluation reports indicate that the VIS system, with its application VIS Mail, facilitated direct exchanges and consultations between consulates of different Member States on visa applications. This enhanced both operational cooperation and the harmonisation of decision-making, contributing to a more coherent implementation of the common visa policy. Overall, through its support for the modernisation of consular IT infrastructure and the rollout of large-scale systems such as VIS, **the Instrument played a central role in promoting interoperability, consistency, and cooperation among Member States.**

Evidence from country case studies aligns broadly with the findings presented above, while also highlighting some differences in implementation across Member States. E.g. in Italy, the Instrument funded the implementation of the Visa Information System (VIS) and

([44]) Analysis of the ex-post evaluation reports of the national programmes

broader digitalisation of visa procedures, including the development of a national database and the establishment of a centralised consular network.

Case studies also suggest that while ISF-BV contributed to improved consular infrastructure and practices in several countries, the depth and focus of support – particularly in terms of harmonisation – varied. For instance, Spain confirmed the rollout of VIS across most consulates, together with IT improvements and the use of VIS Mail functionalities to support consistent application of visa rules. Training and information exchange were also mentioned, though the level of detail was limited. In Norway, the ISF-BV funded hands-on, practical training for consular staff, alongside evaluation visits to promote good practices. In contrast, the case studies for Poland and Croatia point to more partial contributions. While both countries implemented training for consular personnel, neither provided detail on whether this supported harmonisation with Schengen standards.

ISF-BV played a limited role in driving the geographical expansion of consular coverage, according to both implementation and ex-post evaluation reports. Only a few Member States used the Instrument to expand their consular presence. According to the ex-post evaluations and implementation reports, expansion efforts focused primarily on training and refurbishing existing offices rather than opening new ones. This was also highlighted during the validation workshop. For example, in 2022, only 10 out of 30 countries ([45]) reported actions to enhance consular presence abroad. These actions included the deployment of visa and document advisors or Schengen cooperation officers, often based on bilateral agreements, rather than the establishment of new consulates. Finland was a notable example regarding upgrading the treatment of visa applications, with the development of liaison officers along with the establishment of visa application centres to support the processing of visa applications.

An exploratory statistical analysis under SO1 showed a weak correlation between the establishment of new consular representations and ISF-BV operations, suggesting that where such developments occurred, they were often independent of Union funding.

Survey results provide partial triangulation of these findings. Among national authorities (55 respondents), 42% stated that ISF-BV contributed to the operational objective of better consular coverage and harmonised visa issuance practices either to a very large or large extent. A further 14.5% responded "to some extent," 7.3% "to a limited extent," 1.8% "not at all," and 34.5% "I don’t know / prefer not to answer." This view was even stronger among other stakeholders (30 respondents), where 54% reported a large or very large contribution, while 10% said "to some extent," 7% "to a limited extent," and 30% selected "I don’t know / prefer not to answer." Among beneficiaries (37 respondents), the perceived contribution was more muted, with only 22.3% reporting a large or very large contribution, 11.1% "to some extent," 2.7% "to a limited extent," 8.3% "not at all," and 55.6% selecting "I don’t know / not applicable." These results suggest varied perceptions, with stronger recognition among institutional actors, and limited visibility or awareness of consular activities among final beneficiaries.

Survey results also support the contribution of ISF-BV to the common visa policy. Among national authorities (55 respondents), 72.8% reported that the ISF-BV contributed either to a very large (27.3%) or large extent (45.5%). An additional 10.9% indicated some

([45]) 30 ISF BV programmes, including for 26 MS (at the time, EU 28, excepting IE and UK for the implementation period) and 4 Schengen Associated Countries (NO, IS, LI, CH).

extent, while only 1.8% said to a limited extent and none said "not at all." The remaining 14.5% responded "I don't know / prefer not to answer."

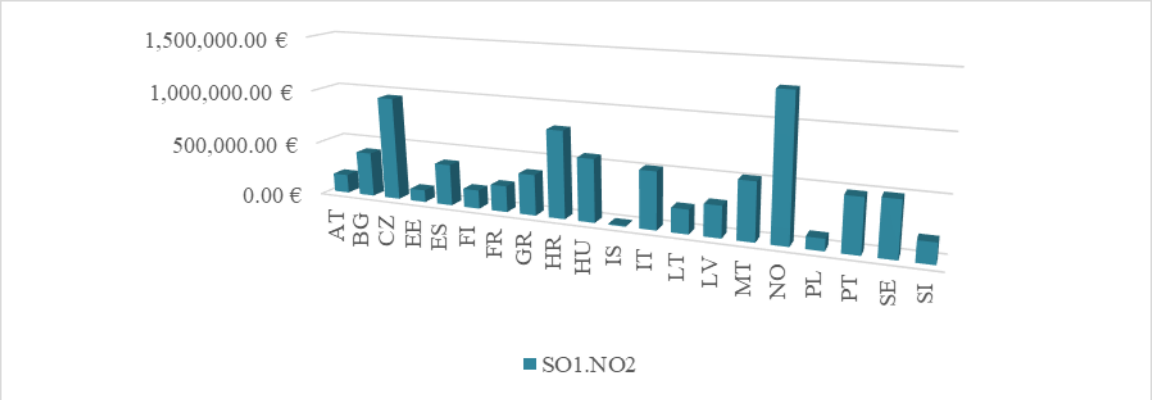
Other stakeholders (30 respondents) were similarly positive, with 70% indicating a large or very large contribution. Only 7% reported a limited contribution, and 20% were unsure. Among beneficiaries (37 respondents), perceptions were more mixed: 33.4% reported a strong contribution, 11.2% to some or limited extent, 5.6% not at all, and 44.4% were unsure or found the question not applicable.

Overall, the ISF-BV-funded operations helped Member States and Schengen Associated Countries to address key infrastructure and system gaps, ensuring more consistent, secure, and harmonised implementation of the common visa policy through updated and interoperable IT systems.

Ensuring the application of the Union acquis on borders and visas

Triangulated evidence from implementation reports, ex-post evaluations, country case studies, and survey responses indicates that **the ISF-BV contributed to the more efficient and uniform application of the Union acquis on borders and visas**. This contribution was primarily achieved through investments in IT systems, consular infrastructure, and targeted training.

Figure 10 - SO1.NO2 Union Acquis (allocated amounts – EUR million)



Source: European Commission - SCF2014 data

Country case study insights generally support the finding that ISF-BV contributed to a more uniform application of the Union acquis on borders and visas, particularly through IT system upgrades and, to a more limited extent, staff training. The Romania case study provides the strongest evidence of acquis compliance, explicitly identifying the application of the acquis as a direct outcome of ISF-BV interventions. Romania's development of the national VIS (N-VIS) and readiness for integration with the EU Central VIS clearly aligned with Schengen requirements. In Croatia, ISF-BV helped modernise IT systems and consular infrastructure, but the national evaluation highlighted underutilised opportunities for acquis-relevant staff training.

Beyond IT investments, the ISF-BV also supported actions that reinforced the correct application of EU rules, equal treatment of visa applicants, and consistent interpretation of legal requirements. Training activities - such as those improving staff knowledge of Schengen rules - helped translate the *acquis* into daily practice. For example, in Estonia,

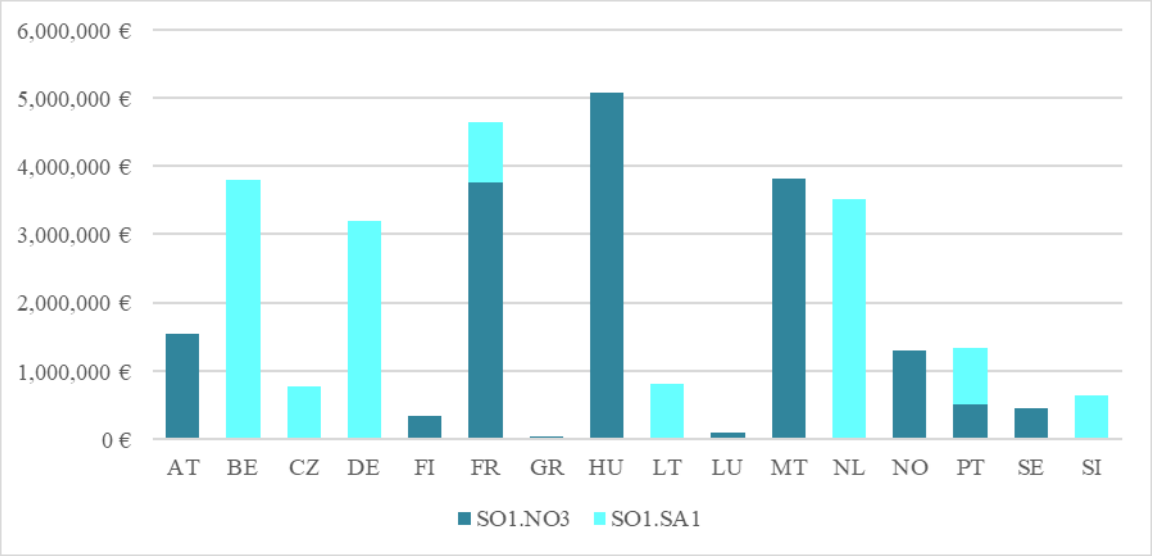
training led to the review and adaptation of working instructions for visa processing ([46]). In Croatia and Norway, specialised training for border control staff and identity verification experts helped ensure compliance with Schengen requirements ([47]). 0

While the full digitalisation of the Schengen visa process was formally proposed only in April 2022 and adopted under Regulation (EU) 2023/2667 ([48]), earlier ISF-BV support for IT system upgrades laid essential foundations for Member States to align with evolving acquis requirements. These early investments increased readiness and interoperability, thereby easing the transition towards digital visa processing. Survey results partially confirm this contribution. Among national authorities (55 respondents), 45.5% indicated that the ISF-BV contributed to this objective to a very large or large extent, with 20% selecting "to some extent," 7.2% indicating a limited or no contribution, and 27.3% stating "I don't know / prefer not to answer." Responses from other stakeholders (30 respondents) were even more positive, with 63% indicating a very large or large contribution. In contrast, beneficiaries (37 respondents) showed more varied perceptions, with only 30.6% reporting a very large or large contribution, 19.4% to some extent, 8.3% not at all, and 41.7% unsure or not applicable.

Overall, the combination of training activities and IT modernisation contributed to improved procedural coherence, reduced the risk of errors, and supported a more uniform application of the Union acquis across Member States and Schengen Associated Countries.

Cooperation between Member States operating in third countries

Figure 11 - SO1.NO3 Consular Cooperation and Specific Actions on Consular Cooperation (allocated amounts – EUR million)



Source: European Commission - SCF2014 data

([46]) Ex-post evaluation report on Estonia's national programme of ISF 2014-2020.
([47]) Country case studies – Croatia, Norway.
([48]) Regulation (EU) 2023/2667 of the European Parliament and of the Council of 22 November 2023 amending Regulations (EC) No 767/2008, (EC) No 810/2009 and (EU) 2017/2226 of the European Parliament and of the Council, Council Regulations (EC) No 693/2003 and (EC) No 694/2003 and Convention implementing the Schengen Agreement, as regards the digitalisation of the visa procedure.

Evidence from ex-post evaluation and DG HOME internal documents suggests that the **ISF-BV was used to promote more structured cooperation between member states and authorities in third countries, but the scale and impact of this cooperation remains modest**. Among 24 countries reviewed, only 10 reported specific actions aimed at strengthening cooperation with third countries, according to the ex-post evaluation reports on national programmes.

Where implemented, the ISF-BV-funded activities mainly focused on capacity-building and advisory deployments. For example, Austria and the Netherlands deployed visa and document advisers to third countries such as Jordan, India, Thailand, and Russia (pre-2022) as well as Burundi and São Tomé, in the context of supporting Schengen House visa centres ([49]). It is important to note, however, that not all activities cited in national reports were funded exclusively through ISF-BV. For example, while Malta supported the training of Libyan authorities to disrupt smuggling networks and improve border management, this particular action was financed through the Voluntary Solidarity Mechanism rather than the ISF-BV ([50]).

In addition, the deployment of regional coordination centres—within the framework of the EUROSUR network – represented another ISF-BV-supported mechanism for enhancing cooperation. These supported situational awareness and joint border actions, occasionally involving collaboration with third countries. However, such instances were limited and do not represent the majority of cases

Despite the examples of cooperation, the overall scale and impact of these efforts remained modest. According to DG HOME internal documents summarising the state of implementation of consular cooperation supported by specific actions, around half of the planned projects were either abandoned or underachieved. The main challenges explaining such failures in delivery are, e.g., changing political decisions in Rwanda, security matters in Libya, or evolving needs in Kosovo. In this specific case, the visa liberalisation made the need for consular development no longer relevant. In terms of impact, **challenges persisted in third countries, where visa applicants continued to face long waiting periods, as noted in Commission reports on the implementation of Schengen rules between 2014 and 2024** ([51]). The COVID-19 pandemic further constrained cooperation, restricting cross-border mobility and hindering the deployment of Union advisers on the ground.

Survey results confirmed the limited scope and mixed perceptions of this type of cooperation. Among national authorities (55 respondents), only 29.1% perceived ISF-BV's contribution as large or very large, with 18.2% selecting "to some extent," 18.2% reporting little or no contribution, and 34.5% stating "I don't know / prefer not to answer." Among other stakeholders (30 respondents), 55% saw a large or very large contribution, while 21% indicated some contribution, and 24% were uncertain. Beneficiaries (37 respondents) were more divided: 27.8% reported a strong contribution, 13.9% to some extent, 8.3% not at all, and 47.2% selected "I don't know / not applicable".

([49]) Ex-post evaluation report on Austria's national programme of ISF 2014-2020, ex-post evaluation report on the Netherlands' national programme of ISF 2014-2020.
([50]) Ex-post evaluation report on Malta's national programme of ISF 2014-2020.
([51]) See European Commission, Staff Working Document, report from the commission to the European Parliament and the council a smarter visa policy for economic growth, 2014; European Commission, Staff Working Document, EU Visa Policy - evaluation of the Visa Code, 2024.

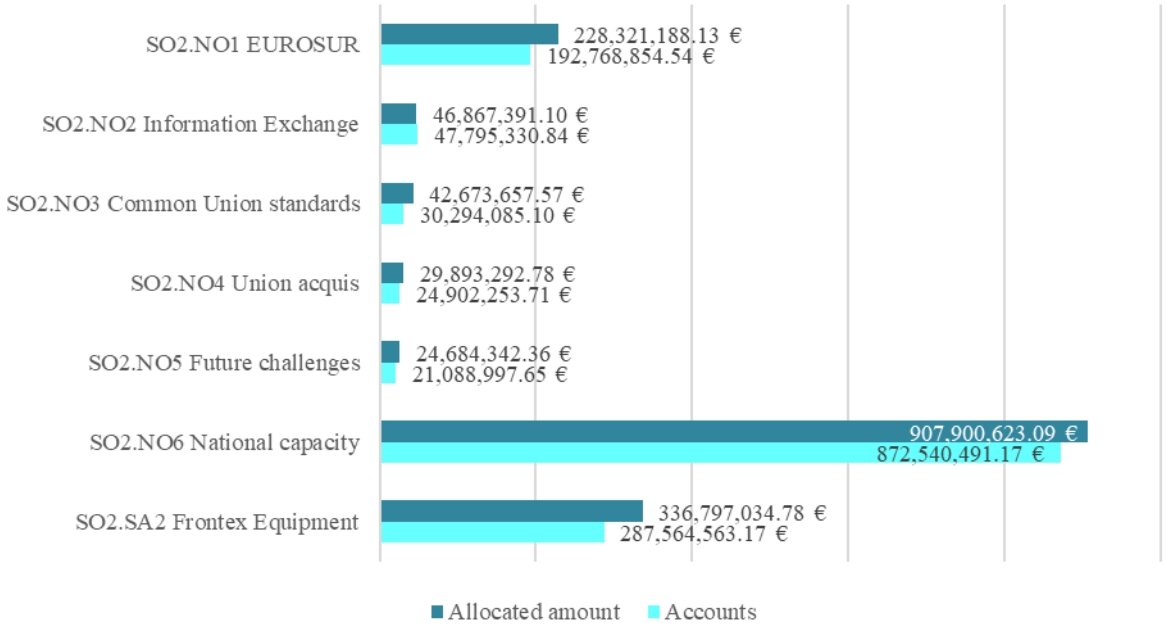
Operating support in SO1

Operating support under Article 10 of the ISF-BV Regulation proved essential for sustaining visa systems in a small group of Member States that chose to activate this funding mechanism. In those cases, this support enabled continuous operation of national infrastructures for consular services. Four countries explicitly referred to operating support under Article 10 as crucial in achieving the common visa policy objective, according to the ex-post evaluation reports ([52]). Austria, Cyprus, Finland, and Germany used this funding to sustain essential consular operations and visa-processing systems ([53]). For instance, Cyprus reports that operating support "co-financed the maintenance of VIS at the Ministry of Foreign Affairs, visa sections, and border crossing points", and even covered routine costs, such as visa stickers, consulates rentals, and local staff salaries, thereby contributing horizontally to the common visa policy objective ([54]). In Finland, it has been likewise noted that operating support "contributed to the objective of the EU common visa policy by maintaining and safeguarding the existing national visa system and common functionalities in the VIS Central System", covering the ongoing "costs of maintenance and operation of the VIS" ([55]). This ensured visa systems remained fully functional even during periods of fluctuating demand (for instance, during the COVID-19 travel decline, when system upkeep had to continue despite fewer applications[56]). Austria highlights that the ISF-BV operating grant (around EUR 3.16 million) enabled the daily operation of its VISION and VIS Mail consular IT platforms, which prevented technical downtimes and allowed real-time data exchange between Schengen states – directly improving the "efficiency and reliability of the visa process" and helping to "strengthen security within the Schengen area" ([57]). Germany also attributed faster and more customer-friendly visa processing to ISF-funded enhancements of the VIS through a set of projects implemented as operating support ([58]).

([52]) Ex-post evaluations report on national programmes of ISF-BV (2014-2020): Austria, Cyprus, Finland, Germany.
([53]) Ibid.
([54]) Ex-post evaluation report on Cyprus' national programmes of ISF-BV (2014-2020).
([55]) Ex-post evaluation report on Finland's national programmes of ISF-BV (2014-2020).
[56] Ibid.
([57]) Ex-post evaluation report on Austria's national programmes of ISF-BV (2014-2020).
([58]) Ex-post evaluation report on Germany's national programmes of ISF-BV (2014-2020).

How did the Instrument contribute to the achievement of the SO 2?

Figure 12 - SO2 components' allocations & declared accounts



Checks on persons and monitoring of border crossings

The ISF-BV played an important role in supporting Member States' efforts to enhance external border management. Its contributions included co-financing infrastructure modernisation, accelerating IT system readiness, expanding biometric identity verification, and improving staff training. While systemic delays and implementation challenges were present, the Fund clearly enabled a wide range of national-level improvements that laid the groundwork for more secure and efficient border control in the Schengen area.

Ex-post evaluation reports across 23 countries show that clear progress was made in enhancing external border control and improving the efficiency of border checks, with the ISF-BV playing an important role in supporting these developments. Reported improvements include modernised infrastructure, deployment of advanced IT systems, upgraded surveillance equipment, and enhanced document and identity verification processes. However, the extent of progress varied across countries, with some exceeding targets and others facing delays or challenges in assessing effectiveness. While the pace and scope of activities varied, especially in IT systems, these differences largely reflect the shared Union-wide delays in deploying large-scale systems such as EES and ETIAS. In this context, the relevant benchmark was not full implementation, but national preparedness to meet future requirements.

A major area of progress was the modernisation of border infrastructure, explicitly reported in 20 ex-post evaluation reports ([59]). ISF-BV funds were used to upgrade border crossing points, surveillance equipment, and checkpoint facilities, ensuring stronger external border control, in countries such as Germany, Malta or Norway.

([59])Austria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Iceland, Italy, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Slovakia, Slovenia, Sweden.

On the other hand, three countries (Belgium, Spain, and Switzerland) did not explicitly report ISF-BV funded infrastructure investments, instead emphasizing other areas such as IT systems and operational measures.

The implementation of large-scale Union border IT systems - such as SIS, EES, and ETIAS - was another strategic focus. Although 14 countries explicitly reported progress in national evaluations ([60]), this figure likely underrepresents actual implementation due to reporting limitations. All Member States received dedicated top-up funding for EES and ETIAS, and while these systems were not fully operational by 2020, efforts concentrated on achieving a high level of technical readiness.

The introduction of Automated Border Control (ABC) gates was another area where seven countries explicitly reported ISF-BV-supported progress ([61]). These systems facilitated faster and more secure processing at airports and external border checkpoints by reducing reliance on manual document checks and enhancing biometric screening. Additionally, at least nine countries confirmed investments in biometric authentication and mobile verification devices, such as fingerprint and facial recognition scanners, contributing to more effective identity verification at borders ([62]).

Beyond infrastructure and technology, ISF-BV also contributed to border personnel training in at least seven countries, ensuring that border management staff were equipped to handle risk analysis, document authentication, and biometric verification procedures ([63]). Notably, Cyprus implemented an extensive training programme for border guards, with 3,426 training courses focused on screening and debriefing techniques. However, in some cases, training-related indicators showed low implementation, such as in Spain, where the number of trained staff was below expectations.

While system-wide delays in IT readiness were reported across Member States - especially concerning EES and ETIAS - these delays were structural and affected the entire Union. They should be understood in the context of long-term system phasing, rather than as indicators of poor national performance.

Survey results partly confirm the positive picture, although some stakeholders presented relatively high levels of uncertainty. Among national authorities (55 respondents), 50.9% indicated that ISF-BV contributed to this objective to a very large or large extent. However, a further 14.5% saw only a limited or some contribution, and nearly a third (30.9%) responded "I don't know / prefer not to answer." Similarly, among beneficiaries (37 respondents), only 27% perceived a large or very large contribution, while 16.2% saw no contribution and 45.9% were uncertain or found the question not applicable. Views from other stakeholders (30 respondents) were more positive, with 60% perceiving a strong contribution, though 20% were unsure.

Country case studies reinforce the conclusion that ISF-BV contributed meaningfully to the effectiveness of checks on persons and border monitoring. For instance, in Croatia, the Fund enabled a combination of upgraded infrastructure, investments in SIS II and EUROSUR, enhanced monitoring of the green border, and training of police officers

([60]) Austria, Czech Republic, Finland, Germany, Hungary, Iceland, Italy, Liechtenstein, Lithuania, Luxembourg, Malta, Slovakia, Slovenia, Sweden.
([61]) Estonia, Finland, Germany, Luxembourg, Malta, Slovakia, Switzerland.
([62]) Belgium, Estonia, Finland, France, Germany, Hungary, Lithuania, Slovakia, Sweden.
([63]) Cyprus, Czech Republic, Finland, Hungary, Italy, Norway, Slovenia.

in line with Schengen standards ([64]). In Italy, ISF-BV supported targeted training for end-users and pilots, improving the efficiency of border control operations, and funded the acquisition of document fraud detection equipment, directly enhancing the quality of identity checks ([65]). Norway provides a particularly illustrative case, where ISF-BV investments in mobile digitised border check systems - referred to by national authorities as a transformative change - enabled automated identity verification at sea borders using biometric tools linked to international databases ([66]).

The control of the Union external borders is the key to ensure the absence of controls at the internal borders. Thus, all measures improving the management of the EU external borders contribute to freedom of movement in the Schengen area, and thereby to the absence of controls at the internal borders, In line with recital 6 of the Schengen Borders Code "Border control is in the interest not only of the Member State at whose external borders it is carried out but of all Member States which have abolished internal border control". In addition to strengthening controls at the external borders, the analysis of ex-post evaluations of the national programmes reveals general observations on ISF-BV-funded activities that were indirectly linked to sustaining the absence of controls at internal borders. While such measures were not among the direct aims of SO-2, several countries reported actions that supported the Schengen *acquis* more generally.

Integrated management system for external borders

Overall, the ISF-BV played a central role in supporting both the technical and structural foundations of integrated external border management, while also enabling broader EU cooperation mechanisms., as evidenced in national evaluations and stakeholder feedback. While 19 ex-post evaluations of the national programmes ([67]) reported ISF-BV supported measures that contributed to the goals of integrated border management, only four countries ([68]) did not provide evidence of relevant ISF-BV funded progress in this area.

Ex-post evaluations confirm that most Member States reported progress toward establishing an integrated management system for external borders, with support from the ISF-BV. These included coordinated implementation of large-scale and interoperable systems such as SIS, EES, and ETIAS; inter-agency collaboration between border, customs, asylum, and law enforcement authorities; and internal flanking measures such as identity management and document security. However, only a nine countries ([69]) made explicit references to the principles or responsibility in this context, linking their ISF-funded actions to the broader EU objective of shared border management responsibility.

Survey findings broadly confirm that national authorities and other stakeholders perceived these interventions as meaningful contributions to integrated border management. Among national authorities, 56.3% reported that ISF-BV contributed to a large or very large extent to reinforcing external border checks and inter-agency cooperation, while 50.9% reported similarly for internal flanking measures including document security and identity management. Perceived contribution was somewhat lower (43.6%) in the area of combating cross-border crime related to border movements (e.g. smuggling and

([64]) Country case study – Croatia.
([65]) Country case study – Italy.
([66]) Country case study – Norway.
([67]) Austria, Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Iceland, Italy, Liechtenstein, Lithuania, Malta, Netherlands, Slovakia, Slovenia, Sweden, Switzerland.
([68]) Spain, Poland, Italy, Ireland.
([69]) Austria, Bulgaria, Czech Republic, Finland, Liechtenstein, Lithuania, Malta, Sweden, Switzerland.

trafficking). This pattern suggests that the Fund was most visible and impactful in supporting the core operational and technical dimensions of border management.

Among other stakeholders, perceived contribution was strongest in relation to flanking measures (66% reporting a large or very large extent), followed closely by inter-agency coordination and border control (60%) and crime prevention (66%). Responses from beneficiaries were more cautious across all dimensions: between 24% and 33% reported a large or very large contribution, while nearly half selected "I don't know / not applicable," indicating limited visibility of these measures at the end-user level.

Further advancements were made in the maintenance and advancing surveillance and ICT systems for border control, improving the accuracy of border management through up-to-date field data. Some of these systems were particularly innovative, as demonstrated by the case study undertaken in Italy. Maritime border surveillance was improved through the development and implementation of a new automated information system designed to provide "near real-time" updates to the National Situation Picture.

The positive impact of these investments is aligned with the findings of an exploratory regression analysis carried out for this evaluation which points to a statistically significant association between ISF-BV expenditure under SO-2 and increased detections of persons using fraudulent travel documents detected at the border crossing point, holding victims of trafficking in human beings, and total uniform visas issued constant after controlling for key contextual variables ([70]). Statistically, the model used provides strong evidence that financial expenditure is positively associated with the dependent variable. In other words, changes in financial expenditure levels have a reliable, non-random effect on the outcome. Although the scale of impact is tiny per unit, it could accumulate over large changes, thus higher investment. However, this finding should be interpreted with caution due to data quality and availability limitations.

According to the ex-post evaluation reports, **a key area of development was the integration and modernisation of EU-wide IT systems, particularly the Schengen Information System (SIS II), the Entry-Exit System (EES), and the European Travel Information and Authorisation System (ETIAS)**. While the full implementation of EES and ETIAS was postponed at EU level, all Member States were required to take preparatory steps and develop national components under ISF-BV. At least 19 countries explicitly reported ISF-supported enhancements to these systems, ensuring improved border security, traveller verification, and international data exchange ([71]). Similarly, six countries reported investments in systems such as the Visa Information System (VIS), European Dactyloscopy (EURODAC), and European Criminal Records Information System for Third-Country Nationals (ECRIS-TCN) ([72]). While some, such as Slovakia, invested in national components like N-VIS, others, including the Netherlands and Malta,

([70]) The model concludes that for each euro spent into the ISF-BV programme, the number of detections of fraudulent documents increase by 3.915. The necessary euro amount to be inputted in order to reach the detection of one person is 255,427.00 euro, holding other variables constant. However, this amount is not spent only on infrastructure related to detection, but also on trainings, fleet for irregular border crossings and coordination centres. The most important finding regarding this predictor is that effect of the ISF-BV investments is positive and statistically significant. The t-value is 2.3990 and the p-value is approximately 0.0184779, which is significant at a 5% level. (Preparatory study for the evaluation, annex II.11).

([71]) Austria, Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Iceland, Italy, Liechtenstein, Lithuania, Malta, the Netherlands, Slovakia, Slovenia, Sweden, Switzerland.

([72]) Cyprus, Finland, Lithuania, Luxembourg, Malta, the Netherlands.

allocated ISF funding for technical preparations and integration with EU-wide systems, thereby strengthening border management interoperability.

Survey results align with this overall positive assessment. Among national authorities, 72.8% of respondents stated that ISF-BV contributed to setting up and operating IT systems, communication infrastructure, and border surveillance equipment to a large or very large extent, with 0% reporting no contribution. Similarly, 70% of other stakeholders selected a large or very large extent, while only 3% responded negatively. Among beneficiaries, 33.4% perceived a large or very large contribution, 5.6% responded "not at all", and 44.4% selected "I don't know / not applicable". This disparity suggests that while infrastructure investments were substantial, they may have been less visible to beneficiaries not directly involved in border operations.

Application of the Union's acquis on border management

Overall, ISF-BV played a pivotal role in harmonizing border management practices across Member States, facilitating the adoption of EU-wide IT systems and training programmes, ultimately strengthening compliance with Union border management standards. the Fund contributed to aligning national border management systems with the evolving legal and technical requirements of the Union's acquis. In their ex post evaluations, 18 participating countries explicitly reported progress this regard, with the Instrument playing a crucial role in this process ([73]).

A key area of progress was the implementation of Schengen-related IT systems, which serve as essential components of the Union's legal framework for border management. Together, they support interoperability, facilitate real-time data exchange, and strengthen risk-based control procedures at the Union external borders. At least 19 countries have successfully integrated these systems to enhance compliance with EU regulations ([74]). These evaluations of the national programmes highlight that ISF-BV support enabled countries to meet obligations related to the operational rollout of these systems, follow up on Schengen evaluation recommendations, and align with European Integrated Border Management strategies. For instance, Slovakia and Slovenia used ISF-BV to implement Schengen recommendations and prepare for EES and ETIAS. Similarly, Italy modernised national infrastructure to support the Schengen server room and standardised entry systems.

Survey responses support these findings. Among national authorities, 45.5% reported that ISF-BV contributed to the application of the Union's acquis on borders and visas to a large or very large extent. Among other stakeholders, this figure rose to 63%. In contrast, only 30.6% of beneficiaries reported a similar level of contribution, and 41.7% selected "I don't know / not applicable" indicating more limited awareness of acquis-related activities at the end-user level.

Training and capacity-building initiatives were another important mechanism for strengthening the application of the Union's acquis in at least eight countries ([75]). Cyprus, Estonia, Finland, Germany, and Hungary used ISF-BV funding to train border guards and

([73]) Austria, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Iceland, Italy, Liechtenstein, Lithuania, Luxembourg, Malta, Norway, Slovakia, Slovenia, Sweden.
([74]) Austria, Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Iceland, Italy, Liechtenstein, Lithuania, Malta, Netherlands, Slovakia, Slovenia, Sweden, Switzerland.
([75]) Cyprus, Czech Republic, Estonia, Finland, Germany, Hungary, Luxembourg, Norway.

police officers on EU regulations, document verification, and risk assessment techniques ([76]). Norway's training programmes led to measurable improvements in staff competence, reinforcing EU standards in sea border control ([77]).

Despite this progress, challenges in full implementation were noted. Belgium, Poland, Spain, Switzerland, and the Netherlands either did not explicitly mention progress in applying the Union's acquis or faced challenges in measuring ISF-BV impact. Switzerland maintained compliance with Schengen rules but did not attribute any ISF-BV-funded projects to acquis-related progress ([78]).

Situational awareness at the external borders

The ISF-BV contributed substantially to reinforcing situational awareness and reaction capabilities at the external borders by supporting the modernisation of border control processes, the acquisition of advanced surveillance and ICT equipment, and the establishment of interconnected data systems across Member States. Evidence from implementation reports, ex-post evaluation reports, survey data and case studies confirm that the Instrument supported both foundational and innovative actions in this regard.

A key area of progress, as identified through the analysis of annual implementation reports, case studies, and ex-post evaluation reports, was the modernisation of border control infrastructure and equipment, which enabled the digital and real-time registration of data at border crossing points. For instance, in Norway - which faces the challenge of monitoring an extensive and remote maritime border - ISF-BV funding supported the procurement of mobile equipment that enables automated identity and travel document checks, linked to both national and international databases (e.g. Interpol). These technological upgrades significantly improved Norway's ability to monitor border activity and respond rapidly to irregular movements, even in remote locations.

The Instrument also supported Member States in acquiring a broad range of surveillance technologies, as evidenced by the analysis of national inspection reports. These included cameras, mobile units, and automated systems for land, air, and sea monitoring. In Sweden, for example, the ISF-BV supported the introduction of automated license plate recognition systems. Such tools improved the quality and timeliness of border-related data, enabling faster and more informed operational responses.

Moreover, evidence from the ex-post evaluations confirms that 22 countries progressed in reinforcing situational awareness and enhancing reaction capabilities at the external borders, with strong support from the ISF-BV. A wide range of actions was implemented, including the development of EUROSUR National Coordination Centres (e.g. Austria, Cyprus, Finland, Slovakia), acquisition of surveillance equipment such as thermal cameras, drones, mobile units (e.g. Bulgaria, France, Slovakia), and integration of risk analysis tools and situational picture systems (e.g. Czech Republic, Finland, Sweden,). The Instrument also financed border patrol vessels, aircraft, and mobile units to enhance operational response in countries such as France, Malta, and the Netherlands. Ex-post evaluation reports explicitly linked ISF-funded investments to improved real-time monitoring, cross-border coordination, and faster incident response. For instance,

([76]) Cyprus, Estonia, Finland, Germany, Hungary.
([77]) Norway.
([78]) Belgium, Netherlands, Poland, Spain, Switzerland.

Germany and Lithuania connected national centres and surveillance systems to EUROSUR, improving data flow and regional coordination. Hungary and Luxembourg improved detection and preparedness through Common Integrated Risk Analysis Model (CIRAM) ([79])and traveller pre-registration systems.

This evidence is further supported by findings from country case studies. In Romania, ISF-BV funding supported the development of regional coordination centres linked to EUROSUR, enhancing information sharing and real-time monitoring. Operating support also helped Romania maintain and upgrade surveillance and ICT systems, ensuring the continuity and reliability of critical capabilities. In Spain, ISF-BV contributed to the expansion of EUROSUR and other IT frameworks, which stakeholders identified as key to shaping a more integrated approach to border management. Emergency Assistance

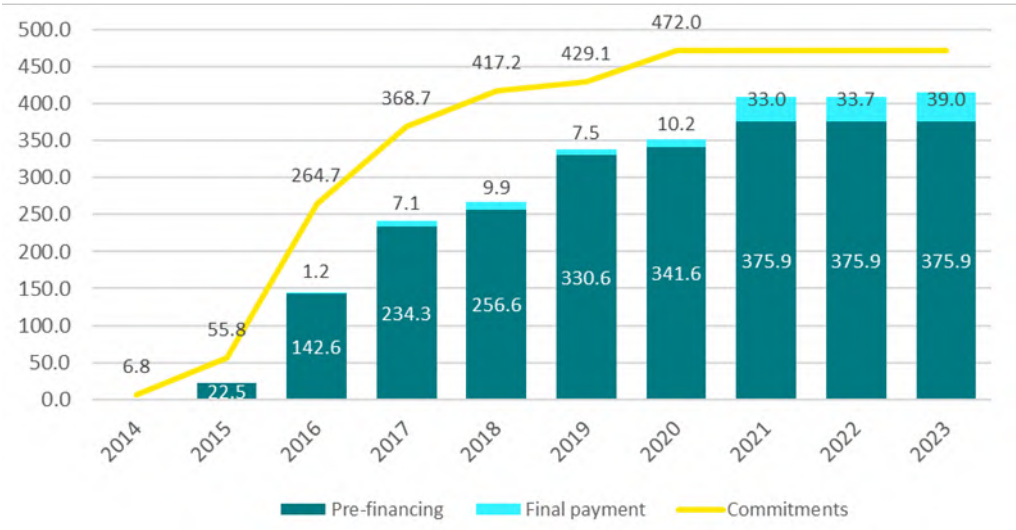
Survey results partially triangulate these findings. Among national authorities, 47.2% of respondents indicated that ISF-BV contributed to reinforcing situational awareness at the external borders and the reaction capabilities of Member States to a large or very large extent, while only 1.8% responded "not at all." Among other stakeholders, 56% reported a large or very large contribution, and no respondents selected "not at all."

Emergency situations requiring urgent action at external borders and the contribution of Emergency Assistance

Between 2014 and 2020, Emergency Assistance under the ISF-BV was mobilised to support swift and targeted responses to migration and border management crises. EMAS was most heavily used during the 2015–2017 period in response to high irregular migration flows, particularly following the outbreak of the war in Syria. During this time, between 18 and 23 EMAS-funded projects were included annually in the Commission's Annual Work Programmes (AWPs). As migration pressures subsided, the number of EMAS projects decreased to between 2 and 6 per year from 2018 to 2020. Over the full programming period, 80 EMAS projects were launched, representing a total EU commitment of EUR 472 million. By the end of 2022, all projects had been concluded. Pre-financing arrangements led to relatively high absorption rates early on, and by the end of the period, around EUR 415 million had been disbursed — corresponding to an overall absorption rate of 87.9%. Emergency Assistance was channelled to 11 Member State authorities, as well as to two international organisations (IOM and UNHCR) and two EU Agencies (EUAA and EUROPOL).

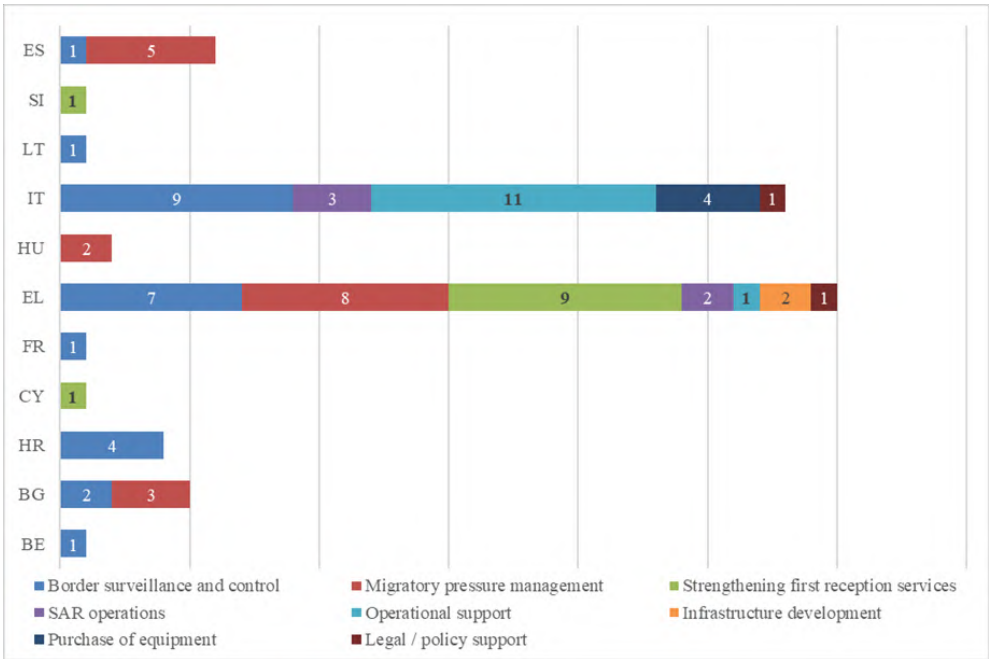
([79]) The objective of the Common Integrated Risk Analysis Model (CIRAM) is to provide a conceptual model to assist Frontex and EU and Schengen countries in the preparation of risk analyses.

Figure 13 - Commitments and financial implementation of EMAS by year (EUR million)



Source: DG HOME data

Figure 14 - EMAS' main operational scope across MS



Source: DG HOME data

Emergency Assistance under the Instrument contributed to crisis management in certain Member States, but its role remained limited across the EU, with most ISF-BV funding allocated to long-term border security investments rather than urgent emergency responses.

While Emergency Assistance played a significant role in EU crisis response, analysis of national ex-post evaluations found explicit insights on its effectiveness in only five countries. These cases point to **EMAS's added value as a flexible and rapidly deployable tool, although a broader assessment of its effectiveness across all beneficiaries would require more systematic reporting in national evaluations**. This does not suggest that EMAS was underused across the Union. It rather reflects the fact that

most national evaluation reports did not provide relevant information on Emergency Assistance. Where such information was included - notably in Greece, Italy, and Bulgaria - EMAS-funded interventions were described as instrumental in reinforcing national border management infrastructure, scaling up operational capacity, and responding to acute migration pressures ([80]).

Country case studies provide concrete examples of how Emergency Assistance contributed to effective crisis response in Member States where it was activated. In Greece, EMAS was described by beneficiaries as the most successful component of the ISF-BV, enabling authorities to respond swiftly during the 2015–2016 migration crisis by covering urgent operational and running costs ([81]). At the same time, according to the same case study, Commission stakeholders cautioned that some EMAS-funded actions may have addressed structural needs rather than short-term emergencies ([82])‥ In Spain, EMAS helped bridge the gap before national programme funding became available, facilitating urgent actions at the start of the programming period ([83]).

Conversely, most Member States did not report ISF-BV-funded emergency actions, indicating that either no Emergency Assistance was required, or alternative funding sources were used. Luxembourg acknowledged the existence of EMAS mechanisms but stated that they were not activated during the evaluated period. While Emergency Assistance under the ISF-BV was not widely covered in national ex-post evaluations, available qualitative evidence confirms that in the Member States where it was used, EMAS delivered timely and targeted support to strengthen border management and migration response capacity. However, the overall assessment of its contribution across the EU remains constrained by the fact that many Member States either did not request EMAS or addressed emergency needs through other funding instruments.

Operating support in SO2

Operating support under Article 10 of the ISF-BV played an important role in maintaining the functionality of border control infrastructure and systems, however evidence for its effectiveness is available for only a limited number of countries. This form of funding helped cover essential recurring costs – such as staffing, system maintenance, and operational expenses, as suggested by ex-post evaluations of the national programmes, survey data, and country case studies. While not all Member States made use of this funding tool - often relying instead on national budgets or other EU instruments - those that did reported clear operational benefits.

Analysis of national ex-post evaluation reports highlights that operating support was an effective instrument for sustaining core border security activities in a limited number of Member States. All countries that applied operating support for visa or border management reported positive outcomes. Furthermore, operating support under the ISF-BV allowed countries to "ensure the operational readiness" of key assets and thereby "significantly contributed" to the progress made in border security and management ([84]). Four countries (Cyprus, Finland, Germany, Hungary) made extensive use of operating support to ensure the continuity and effectiveness of border control operations, by covering ongoing costs

([80]) Ex-post evaluation of the national programmes – Grece, Italy Bulgaria.
([81]) Country case study – Greece.
([82]) Ibid.
([83]) Country case study – Spain.
([84]) Ex-post national evaluation Germany.

that go beyond discrete projects. Germany stands out for having allocated a large share of its ISF-BV programme to operating support: 17 projects related to border management were "classified under operating support […] to support tasks to ensure the operational readiness of IT systems, the maritime fleet and border crossing infrastructure", making up roughly 49% of border-management projects and 45% of the funding (over EUR 23.5 million) in Germany's programme ([85]). This operating support "made a significant contribution" to Germany's achievements under SO2 ([86]). In particular, it enabled the implementation of automated border checks via the EasyPASS e-gates at airports and financed the purchase and maintenance of necessary equipment and supplies for border control and surveillance on a large scale ([87]).

Finland provides another illustrative example of operating support contributing to border management goals. Finland's ISF programme treated operating support as an important tool to meet "compulsory costs of border control and checks. Moreover, Finland used operating support to cover staffing and maintenance costs for its EUROSUR NCC ([88]). Cyprus similarly notes that a portion of its programme's operating support was dedicated to maintenance of the national SIS/SIRENE system, including regular training for system users and purchase of software licences needed for its operation ([89]).

These findings are supported by three national case studies. In Romania, operating support was described as having "significantly contributed" to achieving SO2 by ensuring the continuous operation of surveillance and ICT systems ([90]). Croatia reported similar benefits, using the Instrument to cover operational and maintenance costs for border surveillance ([91]). In Greece, operating support was quickly absorbed in the early years of the programme and was described as critical for sustaining border operations during a period of high migratory pressure ([92]). However, the premature depletion of these funds later constrained the country's ability to maintain that capacity.

Survey data confirms that, among those familiar with the mechanism, operating support was viewed as an effective tool. Among national authorities, 63% reported that it helped border and visa management to a large or very large extent, while just 6% found its contribution limited or non-existent. Other stakeholder views were even more positive: 77% reported a large or very large contribution.

4.1.2 Efficiency

Were the general objectives of the Instrument achieved at reasonable cost?

Evidence of **good practices in public procurement, cost control, and risk assessments** indicates that some Member States have adopted mechanisms to promote cost-effectiveness. However, the available information does not provide sufficient basis to determine whether these practices have been systematically applied across all Member States. Additionally, a series of **factors influenced the efficiency of the interventions**. Challenges such as delays in projects' implementation caused by COVID-19, price surges,

([85]) Ex-post evaluation report for Germany.
([86]) Ibid.
([87]) Ibid.
([88]) Ibid.
([89]) Ex-poste valuation report for Cyprus.
([90]) Romania – country case study.
([91]) Croatia – country case study.
([92]) Greece – country case study.

and administrative workload have impacted efficiency. The efficiency analysis shows that some countries (top-performing) have achieved substantial outcomes at low costs, while mid-tier and low performers varied in efficiency.

Based on the targeted surveys conducted, **the overall perception of the stakeholders is that the ISF-BV operations have been cost-effective**. Over 70% of the consulted national authorities ([93]) acknowledged that the ISF-BV operations, especially those included in the national programmes, achieved their results at a reasonable cost. The survey targeting ISF-BV beneficiaries ([94]) indicates a similar perception, although the limited number of answers to this survey ([95]) does not allow us to draw a generalised conclusion. Also, while the feedback from national authorities and beneficiaries is largely positive, it is important to consider that these perspectives may be influenced by their roles and experiences. National authorities, being closely involved in the implementation, may have a favourable view of the outcomes. Similarly, beneficiaries, who directly benefit from the funding, might also perceive the results positively.

Mechanisms to ensure cost-effectiveness have been implemented across the Member States, although the available information does not provide a comprehensive overview or a systematic use of cost-effectiveness mechanisms across the Member States. Insights drawn from the desk research and case studies highlight that in some cases the public procurement ensured the cost-effectiveness in the execution of projects and achieving the best value for money. For example, the national evaluation of Cyprus specifically highlighted that public tendering for equipment supplies and infrastructure improvement ensured competitive pricing at market standards.

The review of the interim national evaluations reveals **good practices** implemented by the Member States to foster efficiency in implementation, such as **rigorous cost control**, as detailed out in Hungary's approach to financial oversight. **Comprehensive risk assessment** was a key strategy in Finland, where the RA conducted detailed economic evaluations and risk assessments for each project before granting funds. This proactive approach allowed for the identification and mitigation of potential risks early in the project lifecycle. **Lean project management** was conducted in Estonia, where projects were managed by small teams, typically 1-2 persons. This approach kept personnel costs minimal, allowing more financial resources to be allocated to core project activities, ensuring efficient goal achievement and minimising administrative overheads.

Moreover, the set-up of the ISF-BV instrument was designed in such a way that it allowed the Member States to **adjust funding allocations to adapt to new challenges and requirements**. Apart from ensuring the relevance of the programme, this was also instrumental for ensuring efficiency in the implementation of the Instrument.

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(93) Targeted survey for National Authorities, Question 18: "To what extent do you consider the effects of the operations financed by the following components of the ISF-BV Instrument were achieved at a reasonable cost?", 53 respondents.

(94) Targeted survey for beneficiaries, Question 15: "To what extent do you consider the effects of the operation(s) you implemented under the ISF-BV were achieved at a reasonable cost?", 36 respondents.

(95) 36 answers received. However, the limitation of the targeted survey is represented by the fact that the entire population targeted for the survey cannot be estimated, considering the survey for beneficiaries was distributed via National Authorities.

The evaluation has also incorporated a **cost-benefit analysis**. This analysis, triangulated with other sources, provides a comprehensive perspective on both the cost efficiency and the benefits of the implemented interventions.

With regard to the **costs and benefits,** a systematic methodology was applied ([96]) in order to identify, map and assess the costs and benefits resulting from the implementation, considering different types of stakeholders. Given the data limitations ([97]), the cost-benefit assessment focused on financial inputs (expenditures and absorption rate) while, for the outputs, the common indicators were considered the best possible proxy to assess the achieved results of the Instrument. Considering all the limitations of this analysis, **these results should not be used to identify which types of projects are more cost-effective. Instead, they should underline in which areas of intervention Member States have difficulties in selecting cost-effective projects**. This is because the types of projects funded reflect the specific needs of each Member State. To conduct the efficiency analysis, addressing also the limitations found, a two-step approach was applied ([98]):

The first step consisted in **identifying those Member States** that, based on the available data, **achieved the best results compared to financial resources spent** and rank them according to top mid and low performers considering these variables.

The second step **aimed to identify patterns** (i.e., types of projects) that could explain the results obtained under the first step.

A short description of the approach used is presented below:

Text Box 1. Description of the approach used for cost- benefits analysis

For the first step, we designed an efficiency scoring system based on the following formula:

$$Efficiency\ Score = \frac{Performance\ Score \times Absorption\ Rate}{Expenditures}$$

This efficiency score was calculated based on the achievement percentage of the a number of output indicators included in the evaluation and monitoring framework. The values were those for the year 2022 (cumulative values). For each indicator, the achieved value was compared to the initial target value to determine the achievement percentage:

$$OI\ Achievement\ Percentage = (Achieved\ Value\ of\ Indicator\ /\ Target\ Value) \times 100$$

This analysis aimed to measure the extent to which each country met its goals for specific output indicators by the end of 2022. By calculating the achievement percentage for each indicator, we evaluate the degree of success relative to the targets set by each country. For countries without a target value (target = 0), the achievement percentage of 0% is marked as "NA" (Not Applicable), which does not affect averages

([96]) As a starting point, we mapped potential costs incurred by various stakeholders, collected relevant data via desk research and targeted consultations, and considered also financial data. The costs identified were categorised by stakeholder type. For National Authorities, costs included financial allocations, technical assistance, and human resources, with indicators derived from National Programmes, Annual Implementation Reports, and instrument monitoring data. Based on desk research and targeted consultation, beneficiaries faced administrative and compliance costs, facing administrative burdens. However, costs related to the number of FTEs deployed by the different stakeholders, as well as administrative burden have not been possible to monetise due to limited information. Therefore, the analysis we performed focuses on the financial costs, as further detailed below in this section and in Annex V.
The identification, mapping, and assessment of benefits followed the same methodological steps. Considering the Instrument's level of implementation, the analysis of benefits focused on the common indicators, as detailed in Annex V.

([97]) Costs related to the number of FTEs deployed by the different stakeholders, as well as administrative burden have not been possible to monetise due to limited information. Therefore, the analysis we performed focuses on the financial costs.

([98]) Several approaches were tested. These approaches have not been successful since a high variation and inconsistencies in the way Member States set their indicator targets were found, leading to different results with each new approach tested.

or other statistics. Consequently, achievements are reported only for countries with a target value for the respective indicator, allowing for comparisons across indicators and countries.

The efficiency score has been scaled to lie between 0 and 100, with 100 representing the highest efficiency. A threshold of 75 identified the top performers, representing the upper quartile of scores. While this ranking reflects relative rather than absolute efficiency, it provides valuable insights into resource utilisation among Member States. This comparison is relevant as it identifies best practices and areas where other Member States can improve by learning from the more efficient ones.

For the second step, to gain more insight into the success of different groups of countries above, we analysed the list of implemented projects based on the keywords the Member States used to describe the projects. The aim was to assess the investment priorities within the different groups of countries above, by considering the level of EU contribution. The insights must be treated with caution, due to several data and information limitations.

This integrated approach has been applied to each of the two specific objectives of the ISF-BV. This allowed us to reach a ranking illustrating the degree to which countries have achieved the expected results of the Instrument efficiently, optimising both performance and resource utilisation, defining their performance in relative terms – comparing countries to one another rather than in absolute terms. Based on this, countries were categorised into three performance categories:

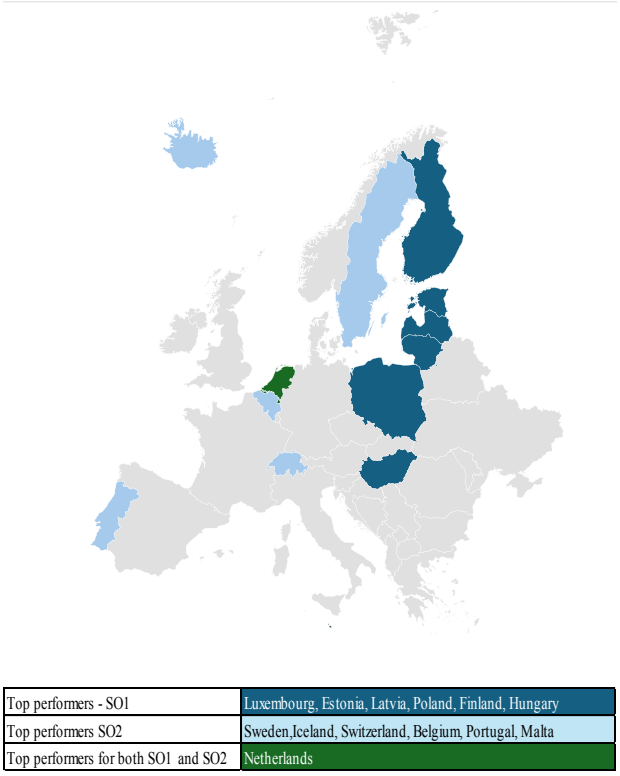
Top performers (i.e countries situated in the first 25% of the efficiency ratio) **demonstrate high efficiency, achieving substantial outcomes at a relatively low cost.** The countries, for both SO, are presented in the accompanying figure.

Mid-tier performers show moderate efficiency, implying they achieved their goals with reasonable resource usage. These countries achieved a satisfactory level of results but could explore strategies from top performers to enhance their efficiency.

Low performers reflect lower efficiency scores, suggesting a potential mismatch between financial input and output. In these cases, funds were less effectively absorbed or translated into high performance.

The analysis of interventions under SO1 and SO2 has revealed different patterns in the types of interventions that top-performing and mid-lower-performing Member States are focusing on, with few similarities between the two categories. As shown in the table below, **top performers under SO1** focused more on projects to support the visa application process, such as the development of information systems for the coordination of visa applications, equipment/software for the extraction of information and consular cooperation. Mid and low performers invested significant efforts in consulate construction / renovation / equipment and IT systems/interoperability of information systems. Both categories of countries (top and low performers) targeted important investments in operations related to VIS.

Figure 15 - Top 25% Member States with the highest efficiency score



Source: Study team cost-effectiveness analysis, presented in Annex IV

Table 4 - Investment priorities within top, mid-tier, and low performers, based on the efficiency score ranking (SO1)

Associated keywords	% of EU contribution out of the total EU contribution to SO1		
	Top performers (a)	Mid-tier and low performers (b)	Differences (a) - (b)
Visa information system (VIS)	20%	40%	-20%
Training in the common visa policy	3%	3%	0%

Associated keywords	% of EU contribution out of the total EU contribution to SO1		
	Top performers (a)	Mid-tier and low performers (b)	Differences (a) - (b)
Support for visa application processing	34%	4%	30%
Schengen Information System (SIS) – general	9%	12%	-3%
IT systems/interoperability of information systems	6%	11%	-5%
Information exchange	1%	0%	0%
Immigration liaison officers (ILO)	0%	0%	0%
Equipment/software for the extraction of information	11%	4%	7%
Entry - Exit System (EES)	0%	1%	-1%
Document security/document advisors	3%	3%	0%
Consulate construction / renovation / equipment	0%	12%	-12%
Consular cooperation	9%	4%	5%
Consular coverage	1%	2%	-1%
Construction / Renovation / Acquisition of equipment BCPs	1%	1%	0%
Training for consular officials	1	0	1
Unknown	0%	1%	-1%

Source: Data extracted from financial and performance information in SFC. Cut-off date: 15.03.2024

Complementing this analysis, the results from the exploratory analysis ([99]) utilising descriptive statistics for SO1 indicate a weak correlation between the establishment of new consular representations and the corresponding ISF-BV operations. This finding suggests that while some Member States effectively leveraged the ISF-BV to establish new cooperations, others pursued similar initiatives independently of the Instrument's support.

These findings underscore the complexity of the relationship between costs and benefits, highlighting the necessity for a nuanced understanding of how different strategies employed by Member States can influence the efficiency of operations and the varying degrees of reliance on the ISF-BV programme.

As regards SO2, top performers focused rather on maritime border surveillance and activities associated with EES, complemented by the development of Integrated Border Management, activities associated with ETIAS Regulation 2018/1240 ([100]), and initiatives aimed at enhancing the capabilities of immigration liaison officers. In **contrast, the less performing groups focused more resources on Frontex equipment and land border surveillance**, followed closely by maritime border surveillance. They also focused on operations related to EES and investments for border checks.

([99]) It should be noted that due to data limitation and constraints, the regression analysis was restricted to the period 2018–2022. It is also important to mention that the conclusions should be taken with caution as the analysis encountered several challenges, due to the constraints imposed by data quality and availability.
([100]) Regulation (EU) 2018/1240 of the European Parliament and of the Council of 12 September 2018 establishing a European Travel Information and Authorisation System (ETIAS) and amending Regulations (EU) No 1077/2011, (EU) No 515/2014, (EU) 2016/399, (EU) 2016/1624 and (EU) 2017/2226, available at the link.

Table 5 - Investment priorities within top, mid-tier, and low performers, based on the efficiency score ranking (SO2)

Associated keywords	% of EU contribution out of the total EU contribution to SO2		
	Top performers (a)	Mid-tier and low performers (b)	Differences (a) - (b)
Training (e.g. for Employees of Border Police to Ensure and Uniformly Apply EU Law/ SIS/ VIS, for personnel Deployed in Third Countries for Border Control)	0%	1%	-1%
Support to National Coordination Centre (NCC) – EUROSUR	2%	3%	-1%
SIS Regulation (EU) 2018/1861	2%	1%	1%
Schengen Information System (SIS) - general	2%	3%`	-1%
Schengen Information System – Automated Number Plate Recognition (ANPR)	0%	0%	0%
Schengen Information System - Automatic Fingerprinting Identification System (AFIS)	0%	0%	0%
Maritime border surveillance	29%	12%	17%
Land border surveillance	5%	14%	-9%
IT systems/interoperability of information systems	4%	3%	1%
Information exchange	0%	1%	-1%
Implementation of Schengen evaluation recommendations	0%	0%	0%
Immigration liaison officers (ILO)	6%	0%	6%
ETIAS Regulation 2018/1240	7%	3%	4%
Equipment/software for the extraction of information	0%	1%	-1%
EES (Reg 2017/2226)	18%	11%	7%
EBCGA (FRONTEX) equipment	5%	19%	-14%
Consulate construction / renovation / equipment	0%	0%	0%
Document security/document advisors	1%	1%	0%
Development of Integrated Border management (IBM)	7%	2%	5%
Construction / Renovation / Equipment BCPs	1%	4%	-3%
Border checks (identification, registration, fingerprinting, screening, debriefing, etc.)	3%	6%	-3%
Automated Border Control (ABC) Gates	2%	2%	0%
Air border surveillance	1%	6%	-5%
Victims of trafficking in Human beings	0%	0%	0%
Unmanned aerial vehicles (UAVs)	0%	1%	0%
Hotspot approach	0%	2%	-2%
Further development of SIS/ SIRENE management	0%	1%	-1%
Risk analysis / support to Common Integrated Risk Analysis Model (CIRAM)	0%	0%	0%
External dimension	0%	0%	0%
Unknown	3%	3%	0%

Source: Data extracted from financial and performance information in SFC. Cut-off date:_15.03.2024

While acknowledging the limitations of this analysis, it is important to note that the results should not be interpreted as definitive indicators of which types of projects are more cost-effective. Instead, they underline in which areas of intervention Member States have more difficulties in implementing cost-effective projects. **The findings that certain interventions do not present an optimal cost-effectiveness ratio does not suggest that these interventions were unnecessary, but rather that the implementation may have been influenced by the unique circumstances** faced by each Member State or could reflect capacity constraints.

The regression analysis ([101]) complements the cost-benefit analysis in that, for SO2, it confirms **a positive and statistically significant relationship between ISF-BV financial expenditure and achieved benefits of increasing the detection of fraudulent documents at the border**. Specifically, the analysis highlights that for every euro invested in the ISF-BV programme there is a significant increase in the number of detected fraudulent documents. As the analysis shows, significant investments target fraud detection infrastructure, encompassing a mix of interventions such as training, resources for managing irregular border crossings, and coordination efforts. This means that **the level of effectiveness and efficiency of the interventions found in the regression analysis cannot be attributed only to one specific type of intervention, but to a mix of interventions targeted and implemented at the Member State level**.

Finally, the analysis revealed that **the efficiency of the interventions was impacted by a series of factors**. Evidence collected from desk research and stakeholder consultations suggest that Member States encountered **challenges throughout the implementation of projects**, which affected the cost-effectiveness and cost-efficiency of the Instrument's implementation. Notably, **the COVID-19 pandemic** significantly impacted project timelines and indicator achievements, prompting adjustments in project management and monitoring practices. Moreover, **limited staff supply** often caused project delays and increased the burden on existing staff, affecting efficiency, as seen in Cyprus where there was a lack of personnel to implement the national programme. **Price surges due to inflation** also affected cost-effectiveness.

Public procurement is another factor that influenced the efficiency of the ISF BV instrument. While public procurement has **generally promoted cost-effectiveness**, the efforts to comply with all tendering rules has sometimes posed challenges at MS level. For example, in Slovakia's case, based on the summary of the audit findings for the ISF programme, the national ex-post evaluation concluded that there were several weaknesses in the procurement process during implementation, pointing out the need to improve processes and increase transparency in project implementation.

It is important to highlight that the minimum standards for public procurement are set at the European level, independent of the ISF-BV instrument. Furthermore, as confirmed by stakeholders during the validation focus group, these EU public procurement rules are supplemented by a series of national regulations tailored to the specific context of each Member State, which might increase the administrative efforts at the level of National authorities and beneficiaries (as further detailed in the section on simplification and administrative burden). While Member States may perceive the rules as complex, it is important to note that these public procurement regulations are designed to ensure

([101]) Should be noted that due to data limitation and constraints, the regression analysis was restricted to the period 2018–2022. It is also important to mention that the conclusions should be taken with caution as the analysis encountered several challenges, due to the constraint imposed by data quality and availability.

transparency, adherence to market-based practices, and the prevention of fraud. However, there remains an opportunity for Member States to ease the procurement process on their side.

Efforts were made at the Union level for **simplification and reduction of administrative burden**, as further detailed in the section on simplification and reduction of administrative burden,

4.1.3 Simplification and reduction of administrative burden

Were the Instrument management procedures simplified, and the administrative burden reduced for its beneficiaries?

The analysis, based on desk research (national programmes, annual implementation reports, national ex-post evaluations) and field research (surveys, interviews, and case studies), compares the 2014-2020 period to 2007-2013, noting that the implementation system of the Home Affairs Funds, with particular reference to Regulation (EU) No. 514/2014, has established a set of significant provisions aimed at reducing burden and simplifying funding procedures for both Responsible / Delegated Authorities and Beneficiaries while preserving the effectiveness of the control mechanism. The main elements are as follows ([102]):

A **single set of rules** for Home Affairs Funds has been put in place in order to ensure a better coordination and management of related funds as well as the harmonisation of procedures.

A **multi-annual programming** has been introduced with a view to guaranteeing more flexibility in the management of national programmes, as it removes the need for drafting annual programmes and, at the same time, enables the implementation of projects with longer life cycles.

To streamline the use of funding and minimise the risk of errors, while allowing for necessary differentiation to account for policy-specific requirements, it was deemed essential to establish **clear forms of support and standardised conditions for expenditure eligibility, including simplified cost options (SCOs)**. In this regard:

- The possibility to use SCOs was intended to reduce administrative burden when declaring expenditure, simplify the control and audit process as well as fasten the processing of payment claims.

- The introduction of national rules on expenditure eligibility was meant to provide more flexibility in the management of national programmes in terms of adaptation to national specificities and simplification of implementation at national level.

Within the framework of national programmes and under the conditions laid down in Article 10 of ISF-BV regulation, Member States are allowed to allocate up to 40% to **Operating Support**, whereas public authorities are tasked with delivering services essential to the EU's public service mission This is supposed to reduce project-specific

([102]) Horizontal Regulation, Recital 19, despite simplification efforts, "the control mechanism should remain efficient, and therefore it is important to recall the applicable rules on the protection of the financial interests of the Union, providing for on-the-spot checks and audits which may be announced as well as unannounced".

burden on national authorities, supporting their capacity to deliver services more efficiently.

- Furthermore, Article 11(2) of the Horizontal Regulation provides that – in compliance with the **principle of proportionality** – administrative burdens in relation to reporting, evaluation, management and control, shall be proportional to the amount of support received, contributing to a more efficient execution of funded initiatives.

- Lastly, the simplification and reduction of administrative burdens is clearly taken into account within the **common monitoring and evaluation framework** (Article 55(3) of the Horizontal Regulation).

Multi-annual programming

The introduction of the multi-annual programming aims to make Union funding more efficient for Member States and **is widely considered** – by Responsible and Delegated Authorities – **as a key simplification measure**, as also explicitly highlighted in 9 ex-post evaluations of national programmes ([103]). **Shifting from annual to multiannual programming has indeed reduced their administrative effort by allowing better planning, decreasing frequent reapplications, and improving continuity of support**. **Member States gained flexibility** to design and implement projects over an extended timeline, facilitating a more structured allocation of resources across consecutive years and reducing paperwork. Such a transition also **contributed to ensuring a stable and predictable funding framework**, an essential aspect for tackling complex challenges within the sector. Additionally, **longer-term funding cycles reduce the administrative effort associated with annual renewals and reporting**, enabling more focus on achieving the Instrument's objectives. Interestingly, this approach also provided a great deal of flexibility in project prioritisation and clarity on strategic objectives. For instance, in Lithuania, beneficiaries highlighted that this flexibility significantly eased the administrative burden, as it allowed decisions on multi-year projects, eliminating the need for annual reprogramming or reapplication processes that could have introduced additional complexity ([104]), according to evolving national security needs, and ensuring that resources were directed toward the most pressing objectives.

Finally, while the annual programming was characterised by increased costs related to application submission, contract agreements, reporting, financial clearance, and compliance checks, the adoption of the multi-annual programming eliminated this additional administrative effort. In this regard, an international comparative analysis conducted as part of the Swiss ex-post evaluation concluded that it reduced the administrative workload; recognised that procurement processes often require a multiannual implementation phase and enabled more comprehensive and complex projects that integrate training and the adoption of new methodologies and processes beyond simple procurement ([105]).

However, some persisting challenges have been identified, mostly related to complexity in the transition phase and a lack of other combined simplification measures. It should be noted that this transition initially presented significant challenges for beneficiaries ([106]),

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([103]) Austria, Cyprus, Finland, Italy, Lithuania, Luxembourg, Malta, Slovenia, and Switzerland ex-post evaluations of ISF-BV 2014-2020.
([104]) Lithuania ex-post national evaluation of ISF-BV 2014-2020.
([105]) Switzerland ex-post evaluation of ISF-BV 2014-2020.
([106]) E.g. Cyprus ex-post evaluation of ISF-BV 2014-2020.

who faced difficulties in drafting programme plans for the upcoming seven years while ensuring alignment with the Union common indicators.

National Eligibility Rules and Simplified Cost Options (SCOs)

National Eligibility Rules provided flexibility and adaptability, particularly in terms of financial management, staff costs, and project modifications. Evidence from 11 ex-post evaluations of national programmes ([107]) confirms that **national eligibility rules have played a crucial role in enhancing instrument management flexibility, streamlining administrative processes, and improving project implementation across Member States**. By allowing countries to tailor provisions within a common EU framework, these rules enabled more context-specific adaptations, ensuring that funding mechanisms aligned with national priorities ([108]). For instance, **Slovakia**'s approach to staff costs, allowing different employment contract types and flexible working time allocations, significantly eased financial reporting efforts for beneficiaries. **Finland**'s adoption of cost models streamlined indirect cost tracking, reducing the complexity of financial audits, while **Lithuania**'s IS VORAS digital system improved efficiency in fund administration, enabling better project monitoring and reporting.

Collectively, these experiences highlight the transformative potential of well-structured national eligibility rules in enhancing efficiency, reducing administrative burden, and ensuring strategic fund allocation. However, despite these, in the targeted survey **only 17% of the ISF-BV's National Authorities reported the use of simplification measures** ([109]) and, at the same time, many Member States struggled to strike a balance between flexibility and compliance, resulting in a persistent high administrative effort.

The ex-post evaluation of some participating countries ([110]) identified the misalignment between national and Union implementing rules as a factor impeding the simplification of procedures in a number of aspects. In some cases, national eligibility rules failed to ease administrative pressures.

Moreover, Member States could have adopted SCOs, which can indeed be highly effective in reducing administrative efforts by allowing beneficiaries to report standard unit costs, such as fixed rates for direct personnel expenses, streamlining financial reporting and enhancing the predictability of project expenditures. In this regard, stakeholder consultations highlighted the need for a stronger commitment to SCOs ([111]), as they significantly simplify administrative requirements, resulting in clearer and faster reporting ([112]). The documentary review showed that a limited number of Member States (**Cyprus**, **Malta**, **Spain**, **Finland**, **Germany**, **Italy**, **Slovenia** and **Switzerland**) used SCOs during the 2014-2020 programming period, **mostly by applying a flat rate for indirect costs and personnel costs**. For instance, in **Cyprus**, SCOs were applied for indirect costs for the verification of project implementation recognising a 7% flat rate, contributing to streamlining financial management and to improving project implementation control. At the same time, it was noted that a wider use of SCOs would not have been effective considering the relatively small size of the Cyprus' allocation. As

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([107]) Bulgaria, Cyprus, Estonia, France, Italy, Lithuania, Malta, Slovenia, Slovakia, and Switzerland ex-post national evaluations of ISF-BV 2014-2020.
([108]) Malta and Cyprus ex-post evaluations of ISF-BV 2014-2020.
([109]) Targeted survey for National Authorities, Question 28: "Were simplification measures (e.g., simplified cost options) used into the Programmes funded by ISF -BV and BMVI instruments?".
([110]) Germany, Slovakia, Cyprus, Hungary and Belgium.
([111]) Targeted EU-Level Interview.
([112]) Case study consultation: Czech Republic.

such, this limited utilisation of SCOs was due to the additional administrative burden and costs associated with the data collection and analysis required for projects under SCOs. Some countries explicitly stated that the limited use of SCOs in their 2014-2020 NP represented a missed opportunity to streamline financial management and ease administrative burden on beneficiaries.

Public procurement

Stakeholders had mixed views regarding the administrative burden of public procurement processes associated with the Instrument. However, while some Member States have expressed concerns regarding the complexity or rigidity of procurement rules, it is important to note that the scope for modification at the fund level is limited. Many challenges arise from national implementation or administrative practices rather than fund-specific requirements. Member States may consider streamlining their internal procedures.

Case study consultations indicated that public procurement procedures were complex, requiring detailed methodologies and, in some cases, external support for their preparation ([113]). Several Member States have implemented more flexible procurement approaches, allowing for greater adaptability in complex projects. In **Italy**, for instance, centralised procurement coordination within the National Authority has been indeed positively received, as it reduces the effort on individual beneficiaries, allowing for better management of tender documentation and contract oversight. In **France**, the establishment of specialised procurement units within Ministries has streamlined reporting and oversight, ensuring faster and more transparent procurement processes. Digitalisation and IT System Improvements have been another notable step forward in procurement simplification. Some Member States, such as **Estonia** and **Lithuania**, have introduced digital systems to facilitate electronic procurement management, reducing manual paperwork. Additionally, discussions on risk-based procurement controls have gained traction.

Despite these improvements, administrative complexity, particularly regarding the length and complexity of procurement procedures, remains a significant barrier for some Member States in fully utilising available resources ([114]). For example, in **Slovakia**, procurement was identified as one of the most time-consuming administrative barriers, with lengthy validation processes and strict documentation requirements slowing project implementation. Similarly, excessive documentation requirements remain a widespread issue across several Member States. In **Germany**, beneficiaries reported high levels of duplicative reporting, with requirements to submit both electronic and hard copy documents for procurement, adding unnecessary bureaucratic steps. These findings are also supported by the targeted surveys conducted as part of this study, which show that National Authorities ([115]) found **procurement procedures (53% of respondents) and information obligations (45% of respondents) particularly burdensome**. By contrast, the most burdensome aspects for beneficiaries ([116]) were **regulatory requirements (36% of respondents)** and **time spent in fulfilling information obligations (33% of**

([113]) Case study consultations: Czech Republic.
([114]) Targeted EU-level interview.
([115]) Targeted survey for National Authorities, Question 20: "To what extent were the following elements related to ISF-BV's Member State programme perceived as burdensome in the context of your institution?", 53 respondents.
([116]) Targeted survey for beneficiaries, Question 16: "To what extent were the following aspects perceived as burdensome in the context of the operation(s) you implemented under the ISF-BV?", 36 respondents.

respondents). However, the limited number of answers ([117]) to the survey among beneficiaries does not allow for a generalised conclusion.

Operating Support

Operating Support helps streamline instrument management by enabling authorities to focus on key tasks without the complexity of project-based funding procedures. With specific regard to its objectives ([118]), this support covers operations, staff and service costs, the upgrading or replacement of equipment, real estate as well as the operational management of systems such as the SIS, the VIS, and any other systems to be implemented. Reportedly, multiple Member States used operating support to improve the IT infrastructure and ensure system stability resulting in a reduction of the administration burden and a simplification of processes ([119]).

For example, in **Estonia**, direct Operating Support enabled ongoing border management activities, with resources dedicated to technical maintenance and operational updates that bypassed the need for recurrent, complex grant applications. **Germany's** approach was similarly strategic, utilising Operating Support to enhance the VIS and EasyPASS automated border control system. This allocation toward infrastructure maintenance reduced the administrative demands associated with frequent reassessment and application processes, streamlining border and visa processing. In **Lithuania**, Operating Support contributed to the introduction of the IS VORAS system which played a key role in reducing administrative burden by improving project management and monitoring for beneficiaries. Although its initial rollout was delayed due to public procurement issues, its eventual implementation brought significant benefits, allowing users to track progress, store data, and streamline reporting. While early technical issues temporarily increased workloads, these were quickly resolved, and beneficiaries found the system highly effective in improving transparency and efficiency.

These cases collectively underscore how Operating Support within the ISF-BV framework effectively streamlined administrative processes, enabling Member States to focus on core operational capabilities and reduce the complexities inherent in project-based funding procedures.

4.1.4 Coherence and complementarity

Coherence refers to the extent to which the objectives set in the ISF-BV were consistent, mutually reinforcing, and effectively integrated within the context of EU funding. It evaluated both the internal coherence – the consistency and reinforcement of the ISF-BV within the Instrument itself, both at EU and national levels – and the external coherence – the relationship with other EU programmes.

([117]) The total number of answers was 36. However, a limitation of the study is the fact that the entire population cannot be estimated

([118]) Objectives within the National Programmes are categorised as following: Objective 1. Promoting the development and implementation of policies ensuring the absence of any controls on persons, whatever their nationality, when crossing the internal borders, carrying out checks on persons and monitoring efficiently the crossing of external borders; Objective 2. promoting the development and implementation of the common policy on visas and other short-stay residence permits, including consular cooperation; Objective 3. Setting up and running secure IT systems, their communication infrastructure and equipment supporting the management of migration flows, including surveillance, across the external borders of the Union.

([119]) National Programmes: Belgium, France, Croatia, Sweden; Annual Implementation Reports: Hungary; Country case studies: Italy, Romania.

4.1.4.1 Internal coherence

The ISF-BV's architecture has several funding components which support complementary objectives and deliver synergies.

The ISF-BV supports national programmes, which are delivered through shared management and support long-term structural needs (at national level). Support for these programmes account for the majority of funding (56.2%). In addition, under direct management and, where appropriate, under indirect management, Emergency Assistance (EMAS) addressed urgent and specific needs in emergency situations, while Union Actions (UAs) financed transnational actions or actions of particular interest to the Union.

The table below outlines the complementary purposes of the ISF-BV components and management modes according to the Regulation. It confirms how they work to address different needs (long-term or shorter-term/ more urgent or emerging needs), and at different levels (national or transnational level).

Table 6 - Management modes and funding components in the ISF-BV according to legal base illustrating the complementary purpose of the different components

Purpose	Shared management	Direct management	Indirect management
Primarily serve internal Union policy in accordance with the specific objectives of the ISF-BV (Art. 9 and 12) *in the national context*	National programmes ([120])	/	/
Transnational projects or projects of particular interest to the Union (Art. 13)	/	Union actions	
Address urgent and specific needs in the event of emergency situations following Art 2.f (Art. 14)	/	Emergency Assistance	

Source: Regulation (EU) No 515/2014 *must be demarcated in the national programme as specific actions

The complementary nature of the components – which may be suited to serving long-term or short term / urgent, national or transnational needs can be observed in practice. The Instrument-level mid-term evaluation report confirmed that the Instrument components were internally coherent and complementary to one another ([121]) which was also reflected

([120]) National programmes were complemented by: a) 4 top-ups in 2018, 2019 for the development and upgrade of large-scale IT systems (EUR 325.7 million for EES, ETIAS, SIS plus EUR 79.1 million IT systems in general) b) "specific actions" that are eligible for higher co-financing rates in order to encourage their take up (Art. 7). A list of specific actions for which Member States may receive an additional allocation to their programmes is provided in Annex II of the ISF BV Regulation, as amended by Commission Delegated Regulation (EU) 2020/446 of 15 October 2019. Specific actions were launched on consular cooperation (2015), for the purchase of equipment by the Member States to be put also at Frontex's disposal for operations at EU level in support of other Member States (2015, 2017, 2018), as well as to reinforce the "border control activities such as border checks and border surveillance measures in areas facing currently or potentially high or disproportionate migratory pressure, or both, including activities related to the establishment, development and operation of hotspot areas" (2019).

([121]) The mid-term evaluation found: Internally, there is high coherence and complementarity between national programmes and EMAS, which have clearly supported each other and high coherence between national programmes and UAs (the latter being clearly designed to complement the national programmes). However, there appears to be room for improvement, especially with regard to UAs and EMAS, because most ISF-BV

in the national mid-term and final evaluation reports feeding into the overall assessment. Responses to the surveys of national authorities confirm this finding is valid for the latter half of the funding period ([122]). Stakeholders interviewed for the country case studies were also positive.

The specific niche function of Union Actions and ways in which they complement other components by supporting projects with high EU added value is demonstrated by the sample reviewed for the in-depth case study on Union Actions. For instance, projects funded through the Migration Partnership Facility (run by the International Centre for Migration Policy Development - ICMPD) occupy a particular niche: one such project sampled in the case study was an example of a cooperation programme between an EU Member State and third country, which shared a land border with the EU Schengen area ([123]). Such actions / projects are common and not typically pursued under national programmes. A challenge for Union Actions is that this can also be difficult for national administrations to administer because the transnational collaboration required (in some cases) is atypical for them and can be perceived as a barrier to participation ([124]).

There are (formal and informal) mechanisms in place to ensure complementarities and, where relevant, synergies across the different components but these could be strengthened. Formal mechanisms are in place to ensure EMAS and Union Actions (delivered through Annual Work Programmes developed by the European Commission) complement the support delivered through the national programmes (developed by Member States in consultation with the European Commission at the start of the programming period) at the EU and national levels:

At the EU level the internal procedures ensured that financial and policy units within DG HOME, as well as other Commission services where appropriate, feed into decision-making processes (i.e. drawing up the Annual Work Programmes), allowing for possible complementarities across funding provided through different components and management modes from the outset. For the delivery of EMAS specifically, before funding is agreed, there was an informal and formal process of review to avoid duplication or overlaps ([125]).

At the national level, the extent to which complementarities are ensured depends on the day-to-day coordination mechanisms at national level, which are within the remit of the responsible authority for the ISF BV programme ([126]). The national mid-term evaluation and final reports analysis indicates that this is almost always assessed positively. However, as mentioned above, there may be differences observed at national level, and this may be

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beneficiaries were not aware of other ISF-BV financed actions and considered coordination to be an informal initiative. There is clearly a need for more formalised information at project and national level.

([122]) The survey of national authorities showed the vast majority assessed the fund structure (both the management modes and different components) to contribute to ensuring complementarities.

([123]) In practice, the sampled action was abbreviated due to political circumstances completely outside the control of those involved.

([124]) As exemplified in discussions with national authorities in multiple countries for the country and thematic case studies, as well as in the focus group discussion confirming this is a general finding, not limited to a few countries or cases.

([125]) Applicants need to demonstrate that the funding is not available through other means (for example support from DG ECHO), and the review process and assessment of applications involves relevant units in DG HOME and (if relevant) Frontex.

([126]) It is the responsible authority who bears the main responsibility for the effective and efficient implementation of the Instrument.

perceived as weaker or stronger in some countries ([127]). An additional layer of assurance is the Monitoring Committee, which has oversight of all the support delivered at national level and can thereby ensure complementarity.

The above formal coordination mechanisms ensured a lack of duplication or overlap but the facilitation of synergies was a weakness identified at the mid-term evaluation of the ISF-BV. This has been rectified to some extent during the remainder of the funding period. For instance, this was observed through a more systematic coordination at national level for Specific Actions supported within national programmes ([128]), as well as efforts to ensure better coordination between Union Actions and national programmes. As such, the situation over the longer term (i.e. under the BMVI) was set to improve ([129]).

4.1.4.2 External coherence

This section is based on EU level desk research, the responses to the three targeted surveys (national authorities, beneficiaries and other stakeholders), EU level interviews, and country case studies.

Mechanisms for coordination

Mechanisms for coordination of activities and funding at EU and national level exist, although they vary across the Member States. Different mechanisms are in place at the national level to ensure coordination of the ISF-BV funding with other EU funds at the programming stage. First and foremost, coordination takes place through the Monitoring Committee and regular coordination between the Responsible Authorities of the different funds. In addition, Member States have put in place additional means to ensure overlap is avoided and synergies are created. Three main mechanisms were focused in the evaluation:

43% of respondents (6 out of 14) confirmed to have put in place monitoring mechanisms aimed to prevent the overlapping of financial instruments, whereas 29% stated they had no such mechanism in place. By contrast, almost all national evaluation reports have mentioned the existence of a monitoring committee, a coordination committee or a central authority to avoid the overlapping of financing.

36% of respondents (5 out of 14) confirmed that coordination mechanisms between the ISF-BV and other funding instruments were established to ensure synergies and their complementarity for the implementing period, such as institutional arrangements, specific directorates, divisions, units, platforms, and committees set up to boost the coordination and synergies with other EU funds. This number was much higher in the final national evaluations, with 10 countries having a defined institutional arrangement in order to avoid the duplication of funding.

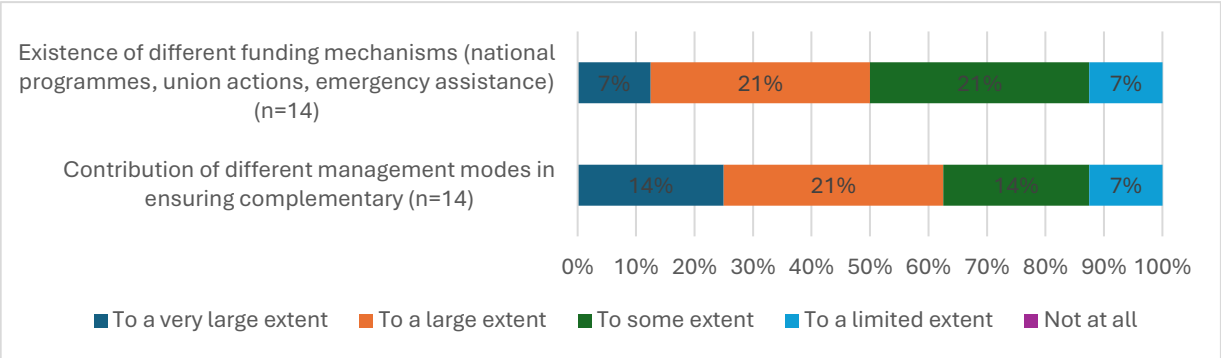
36% (5 out of 14) of the respondents confirmed that their Member State had conducted an assessment to identify other funding instruments with similar or complementary objectives

([127]) Greece appears to be an example of strong coordination. In Greece, there were Coordination Mechanisms to ensure the coherence of the programme (i.e., consultation among key stakeholders and planning of actions to ensure that the actions of the programme respond to real needs and do not overlap with other actions).
([128]) A couple of concrete examples illustrate how this works in practice: in Germany detailed information at the project level facilitates the identification of the need for project-based collaboration on a case-by-case basis to ensure that projects with overlapping target groups / beneficiaries were mutually supportive and synergistic. In Finland proactive networking and knowledge-sharing was used to support synergies.
([129]) According to the draft findings of the parallel study supporting the mid-term evaluation of the BMVI.

at the EU or national levels in order to build complementarities/synergies and avoid overlaps/duplications.

Across all three mechanisms covered by the survey, a large proportion of respondents replied, "I don't know / I prefer not to say" (between 29% and 50% depending on the mechanism). This lack of awareness could also indicate that such mechanisms are not widely used/consulted within the relevant national authorities.

Figure 16 - Assessment of contribution ISF-BV fund structure to ensuring complementarities and synergies, where relevant (N=14)



Source: survey of national authorities

The ex-post national evaluation reports mentioned a few other mechanisms to ensure synergies and avoid duplication: Three Member States noted that the identification of synergies and overlaps lies with the applicant, with an obligation to disclose co-financing through other funding streams, or the funding of similar projects during the application stage. Another Member State explicitly mentioned the use of the CORDIS portal to check for European research projects, noting Horizon 2020 ([130]) projects were missing in this portal.

A few national evaluation reports (the Czech Republic, Slovakia and Finland) mentioned that there is room for improvement, in terms of the practical application of existing coordination mechanisms, in order to better capture synergies. Another national report (Belgium) pointed out the challenge of identifying projects directly financed by the European Commission and recommended the creation of a database, although in fact this already exists ([131]), indicating the need for awareness raising.

At the EU level, coordination at the programming stage took place first and foremost through the Inter-Service Consultation (ISC). In relation to the Home Affairs Funds, overlaps are avoided, and synergies were ensured through the dedicated unit within DG HOME, which closely coordinated with the relevant DG HOME policy units. The Commission also has additional tools at its disposal, including in the first place the guidance and information provided through the HOME Affairs Committee (where the

([130]) Regulation (EU) No 1291/2013 of the European Parliament and of the Council of 11 December 2013 establishing Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020) and repealing Decision No 1982/2006/EC Text with EEA relevance. OJ L 347, 20.12.2013, pp. 104–173. ELI: http://data.europa.eu/eli/reg/2013/1291/oj
([131]) EU Funding and Tender Portal: https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-results?order=DESC&pageNumber=1&pageSize=10&sortBy=es_SortDate&isExactMatch=true

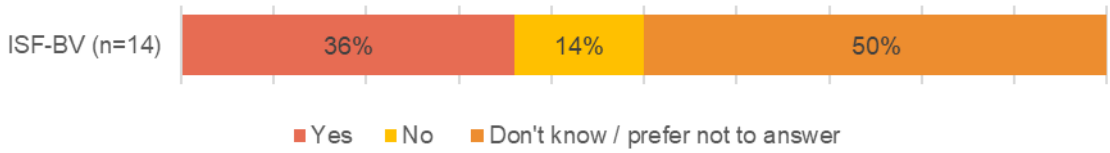
participating countries are represented), the participation of DG HOME in Monitoring Committee meetings, the dialogue between DG HOME and Responsible Authorities, conducting on site visits, as well as audits carried out at EU level.

Coherence and complementarity with national funding mechanisms and policies

As regards **formal mechanisms to ensure complementarity**, the interim evaluation of the ISF-BV confirmed that most Member States ([132]) had carried out assessments of complementarity of objectives of the Instrument with objectives of the national interventions and strategies. The remaining Member States that did not carry out any assessment ([133]) stated that consistency of priorities and projects was ensured by wide stakeholder consultation during the programming stage. In addition, eighteen Member States ([134]) reported putting in place mechanisms to ensure complementarity.

The survey carried out for this study did not confirm the existence of formal mechanisms in most Member States. Only 36% (5 out of 14) of the ISF-BV respondents confirmed that an assessment in their Member State was conducted to identify other funding instruments with similar or complementary objectives at the EU or national level in order to build complementarities/synergies and avoid overlaps/duplications with ISF BV (note: the questions covered both national level and the EU level complementarity). As much as half of the ISF-BV respondents (7 out of 14) did not provide an answer to this question (see Figure below).

Figure 17 - Was an assessment conducted in your Member State to identify other funding instruments with similar or complementary objectives at the EU or national level in order to build complementarities/synergies and avoid overlaps/duplications with ISF BV



However, the interim evaluations, the stakeholder consultations and the case studies carried out for this study, provide some examples of mechanisms in place in Member States:

- Requiring project applications to demonstrate coherence and complementarity: For instance, the interim evaluation noted that in Austria, the templates for project proposals and for project monitoring and reporting included questions specifically aimed at avoiding double funding.
- Responsible Authorities and Monitoring Committees playing a role in ensuring the Instrument's complementarity at national level: For example, in Bulgaria and Finland, the ISF Monitoring committee was indicated as responsible for ensuring the coordination between the relevant EU and national financing instruments.
- Organisation of dedicated working groups and meetings, in order to foster information sharing at the programming stage: E.g. in Hungary, the Ministry of Interior leads a

([132]) Austria, Belgium, Bulgaria, Switzerland, Cyprus, Czechia, Germany, Estonia, Greece, Spain, Finland, France, Hungary, Italy, Lithuania, Malta, Netherlands, Poland, Romania, Slovakia.
([133]) Belgium, Switzerland, Germany, Greece, Croatia, Italy, Luxembourg, Malta, Portugal, Slovenia.
([134]) Austria, Bulgaria, Switzerland, Cyprus, Czechia, Germany, Spain, Finland, France, Croatia, Hungary, Italy, Lithuania, Latvia, Malta, Netherlands, Poland, Slovenia.

ministerial working group that ensures the harmonisation of all the developments at borders co-financed by the EU or by national funds. In Greece, a dedicated Policy Dialogue between key stakeholders was held in 2013 to define the national strategic guidelines and specific objectives of the ISF-BV national programme and ensure their alignment and complementarity with the government policies and initiatives.

- Use of a monitoring and evaluation information system: in Italy, such a system, which covered both the ISF and other programmes, was used to detect the possible duplication of projects from different financial instruments and to automatic generate alerts.

These examples seem to suggest that complementarity is ensured mainly at programming stage, but it is unclear whether the focus of these mechanisms was on ensuring complementarity between EU financial instruments, rather than with national instruments. Nevertheless, stakeholders believed that the mechanisms were sufficient for preventing overlaps and duplications.

The interim evaluation of the ISF-BV concluded that there was evidence of complementarity between the objectives set in the ISF-BV national programmes and those set in national policies of Member States in the area of borders and visa. In this study, it was not possible to do an exhaustive analysis of *all* relevant financial instruments in the Member States. Instead, the evaluation focused on the main relevant policies and actions supported by other EU instruments in the case study countries. The feedback from stakeholders consulted within the case studies clearly confirmed that they acknowledged the ISF-BV's complementarity with national-level policies and funding instruments.

The case studies carried out within this evaluation confirmed the general complementarity of the ISF-BV with policies, strategies and priorities pursued by Member States in the fields of visa policy and border management. For instance, all ICT actions proposed under the ISF-BV programme were in line with the Digital Growth Strategy for Greece and with Greece's National Action Plan on Migration and Asylum, which aimed to address the challenges of migration and asylum.

The ISF-BV was viewed as contributing to high-level policy priorities. For instance, in Norway, the ISF-BV supported this country's ability to fulfil the Schengen obligations, whereas in Croatia and Romania, it supported the country's accession to the Schengen Area, a clear national priority supported by multiple plans and programmes in place to ensure adherence to this goal.

In the interim evaluation consultation activities, **no Member State reported overlaps or duplication** ([135]). Similarly, the case studies and stakeholder consultations also did not identify any cases of duplications or overlap between the Instrument and the national funding mechanisms. However, one EU level stakeholder interviewed noted that it was difficult to ascertain, at least at the EU level, that there were no overlaps between the ISF-BV and national actions funded in relation to third countries.

The interim evaluation also concluded that "Very little information was available as regards the complementarity of actions implemented under direct management with national policies in the fields of visas and borders" ([136]). The national final evaluation reports did not consistently report on the complementarity of the funded actions with national funding instruments. However, some examples were noted in the case studies -

([135]) European Commission, Interim Evaluation of the Internal Security Fund – Borders and Visa (2014-2017). Final Report, pp. 120-122.
([136]) Ibid., p. 121.

for instance, pilots being trained through the ISF-BV funded actions, while the aircrafts used were purchased or modernised through the use of national funding. Another example was upgrades to IT systems using the ISF-BV funding and used with other IT systems or equipment financed with national resources.

Coherence with other Home Affairs instruments (AMIF and ISF-Police)

The ISF-BV is coherent with the objectives and activities funded under the other Home Affairs Instruments: AMIF 2014-2020 and the ISF-Police 2014-2020.

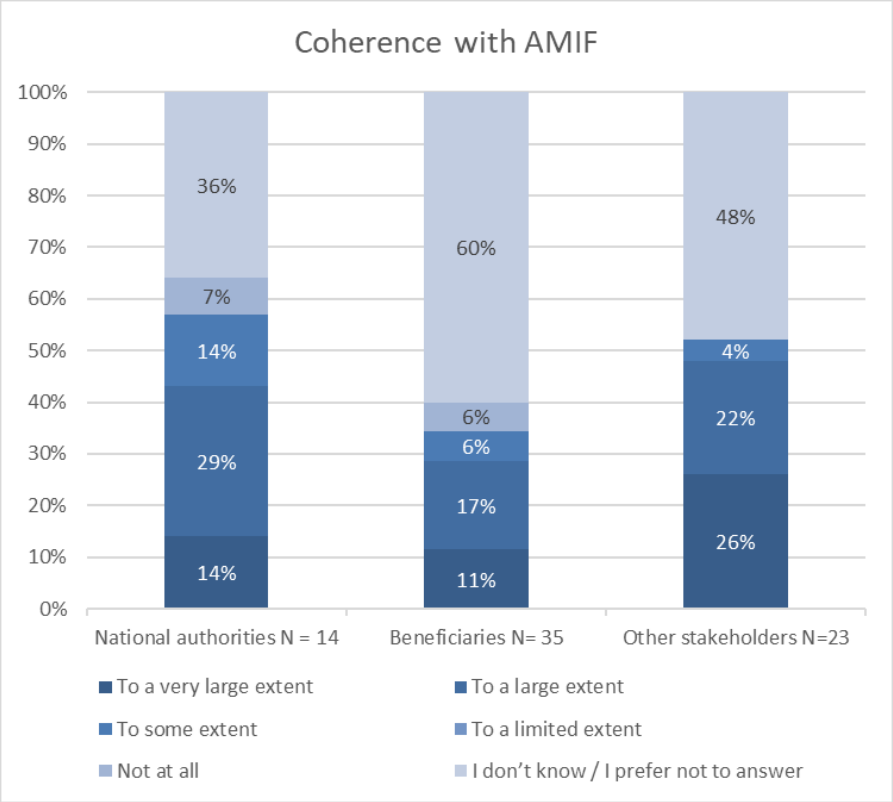
While the ISF-BV, AMIF and ISF-Police contribute to similar EU level objectives in the field of migration, security and border management, provide funding to similar types of beneficiaries and can fund similar types of activities, they cover different policy and thematic areas. While the ISF-BV focuses on achieving a uniform and high level of control of the external borders and effective processing of Schengen visas, ISF-Police focus is on combatting cross-border, serious and organised crime and security-related risk and crisis. The instruments interlink on border-related crimes such as migrant smuggling and trafficking in human beings. Similarly, while the AMIF's thematic focus differs from ISF-BV's by its focus on asylum and integration, the ISF-BV and AMIF interlink on topics such as legal migration and returns. In this context, a few interviewees noted that while it did not impact on the coherence of the instruments (in that legal migration and returns are solely funded under AMIF thereby avoiding the risk of overlap), it would have been more intuitive for the topic of returns to fall under the scope of the ISF-BV rather than AMIF.

Stakeholders positively assessed the coherence between the ISF-BV and the other Home Affairs Instruments.

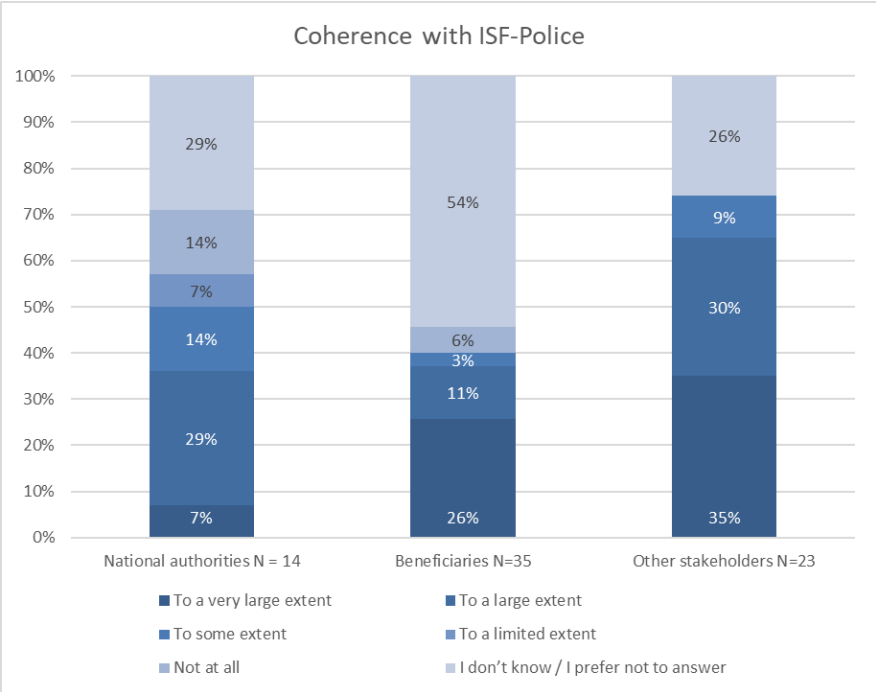
In the survey, stakeholders were asked about the level of coherence of the ISF-BV with AMIF and ISF-Police. Of those that were able to answer the question ([137]), the majority were positive, noting the ISF-BV actions were coherent (some, large or very large extent) with AMIF and ISF-Police funded actions. For AMIF, only 7% of national authorities, and 6% of beneficiaries thought this was not the case (answering "not at all"). For ISF-Police, 14% of national authorities thought this was not the case (accounting for 2 respondents).

[137] As can be seen in the figures in Annex, of the stakeholders consulted through the online survey, a large proportion (26-60% depending on the type of stakeholder and the fund) did not feel they could answer the question whether the actions implemented through ISF-BV were coherent with AMIF or ISF-Police. For beneficiaries and "other stakeholders" this could simply indicate a lack of awareness of these other DG HOME funds. For the responsible/implementing national authorities this could indicate a lack of available mechanisms in place to identify and exploit opportunities to create synergies between the actions funded between the three funds (as also noted above).

Figure 18 - Coherence between ISF-BV and AMIF (% responses)



Source: Targeted survey responses to: "In your opinion, were the actions implemented through the ISF-BV and BMVI Instruments coherent with and non-contradictory (no duplications or overlap) to other EU interventions with similar or complementary objectives? - Asylum, Migration and Integration" N= as indicated in figure .



Note: While the 14 responses from national authorities only include those relevant to ISF-BV, the answers of beneficiaries and other stakeholders cover both programming periods (ISF-BV and BMVI funding)

Although the majority of national evaluation reports provided a general assessment on external coherence and did not explicitly name other EU funding opportunities explicitly, eight national reports (Austria, Belgium, Germany, Spain, Finland, Malta, the Netherlands and Sweden) specifically addressed AMIF, while three (Austria, Luxembourg and the Netherlands) also made reference to ISF-Police. Their overall assessment was positive, with monitoring mechanisms established to prevent overlaps and promote synergies whenever feasible.

The EU level interviews, as well as those carried out as part of thematic and country case studies, did not note any overlaps, gaps, or inconsistencies between the activities funded by the ISF-BV with actions funded under AMIF or ISF-Police.

Coherence with Frontex activities

Coherence with Frontex activities is ensured through coordination with Frontex at the programming stage. The ISF-BV aims to strengthen the capacity of Member States and Schengen Associated Countries to carry out their tasks and responsibilities in the management of the EU external borders as one of the 'legs' of the European Border and Coast Guard.

In line with the Regulation (EU) 2019/1896 on the European Border and Coast Guard, the national authorities of Member States responsible for border management, including coast guards to the extent that they carry out border control tasks, the national authorities responsible for return and the European Border and Coast Guard Agency ('the Agency') shall constitute the European Border and Coast Guard.

Such enhancement also includes supporting joint operations led by the Agency. Frontex was actively involved in programming national programmes to ensure the use of Frontex's analytical tools, guidelines, and training curricula (Articles 9 and 12). Draft national programmes were shared with Frontex for input, and the Agency had direct access to SFC2014. Additional coordination occurred through electronic data exchange on Frontex equipment purchases under shared management, as noted in the interim ISF-BV evaluation. Moreover, since the adoption of the 2019 EBCG Regulation ([138]) and EIBM Strategy ([139]), Member States are required to develop national capability development plans, which then feeds into the funding needs. While the methodology and procedure for establishing these plans was adopted by Frontex Management Board in January 2021 (and reviewed in 2024), interviewees expected this to further increase the alignment between DG HOME funding and Frontex with respect to capability development planning.

In spite of all this, only a limited number of national evaluation reports specifically referenced Frontex. Cyprus reported that coordination among beneficiaries, national authorities, and the Responsible Authority effectively prevented any duplication of funding. Additionally, the Spanish report indicated that efforts were made to seek synergies with other EU funds and EU decentralised agencies, including Frontex, to optimise the utilisation of EU funding resources.

([138]) Regulation (EU) 2019/1896 of the European Parliament and of the Council of 13 November 2019 on the European Border and Coast Guard and repealing Regulations (EU) No 1052/2013 and (EU) 2016/1624
([139]) Frontex, Technical and operational strategy for European integrated border management, Publications Office of the European Union, 2019, https://data.europa.eu/doi/10.2819/76516

Coherence with other EU funding instruments

The ISF-BV interacts with a number of other Union funds, and mechanisms exist to ensure duplications are avoided and that synergies are created. The detailed table in Annex III to this SWD presents a comparison of the objectives and scope of each of these Union funds, as well as the similarities with ISF-BV (potential areas of overlap and opportunities for synergies) and mechanisms in place to ensure synergies.

Stakeholders were generally positive about the coherence between ISF-BV and other funding instruments, although some noted that coordination could be further strengthened in certain areas (e.g. Horizon 2020 and funds in the field of external action). In the survey, stakeholders were asked about the level of coherence of the ISF-BV with other Union funding instruments. Of those 14 national authorities involved in the ISF-BV that responded to the survey, more than half felt they could not answer the survey (similar to the question on coherence with AMIF and ISF-Police above). However, of those that were able to answer the survey question (approx. 7 national authorities), the majority of national authorities were positive, noting the ISF-BV actions were coherent (to a large or very large extent) with other EU funding instruments. Respondents were most positive about coherence with Horizon 2020. The survey with beneficiaries and "other stakeholders" showed similar results, with the majority answering they "did not know", followed by respondents that responded positively (and most positively about Horizon 2020 and ESIF).

The interviews carried out for this evaluation (Union level and national level through the case studies) confirmed that overall, the ISF-BV was coherent with the other Union funds, and no overlaps had been identified. These findings have been further confirmed by the national reports, although they only gave a general assessment on external coherence without providing an in-depth analysis per funding instrument. The only exception is Horizon 2020 which was specifically mentioned by several countries (for example, Germany, Estonia, Spain, Finland, Lithuania, the Netherlands and Sweden).

In relation to the different instruments, the following was noted:

Horizon 2020: The EU level interviews carried out for this evaluation highlighted that beyond the ISF-BV, no other funding mechanism existed to further build on the pipeline of border management-related innovation that was developed under the Horizon 2020 programme. In this context, the ISF-BV funding was seen as a crucial tool to ensure the concepts developed under Horizon would lead to longer-term testing and validation and eventually ensure these capabilities were available to procure on the EU market. However, interviews confirmed that Responsible Authorities are often unaware of the relevant R&D projects funded in their country, as well as the relevant stakeholders involved, and that generally follow up to Horizon 2020 was not prioritised by Member States under the ISF-BV as they tended to focus on using funding to address more immediate needs.

ESF/ERDF: EU level interviewees highlighted that the risk of duplication of interventions with ESF and ERDF was low.

Funding for actions in relation to third countries (EU external action): activities funded by the ISF-BV that are funded in, and in relation to, third countries should be "taken in synergy and coherence with other actions outside the Union, supported through geographic and thematic Union external assistance instruments". As can be seen in Annex III, EU external action is financed through a range of funds, including the Instrument for Pre-Accession Assistance 2014-2020 (IPA II), the European Neighbourhood Instrument,

(2014-2020), and the Partnership Instrument for Cooperation with Third Countries (2014-2020). Interviews with DG INTPA, DG NEAR and EEAS confirmed that as far as they were aware, the number of projects funded under the ISF-BV relating to third countries had been limited, and hence consultations had been limited too. While they did not identify any actual cases of overlap or duplication between these funds and the ISF-BV, they did note that the broad nature of national programmes (lack of details on planned activities and in relation to which third countries at planning stage) made it difficult know whether and what exactly was being funded in relation to third countries under the ISF-BV. In this context, one interviewee noted that coordination with DG HOME had become much closer and more institutionalised since the migration crisis of 2015 which made the topic a political priority. Since then, both sides had been more involved in each others planning, with more formalised and more institutionalised preparatory meetings and information sharing meetings between DG NEAR, DG INTPA, EEAS and DG HOME.

As far as coherence with external spending programmes is concerned. Several challenges in the current funding architecture have been identified including notably the need to further strengthen the link between internal and external priorities in the Union's migration and security funding; the persistent challenge to use all existing (policy, funding, investment and other) tools, both at the disposal of the EU and its Member States, in a Team Europe spirit, to use strategically and timely leverage in relation to partner countries in order to improve cooperation on migration and security; the limitations for funding migration- and security-related actions in third countries, given that most of spending in the external dimension must comply with the criteria for development assistance eligibility

4.2 How did the EU support make a difference and to whom?

4.2.1 EU added value

The examination of this evaluation criterion served to determine the changes that were due to the EU intervention, over and above what could have been expected from national actions by the Member States without the Union's support.

Financial support to Member States

In 22 EU Member States plus Norway and Switzerland, the financial support provided by the ISF-BV enabled the acquisition, modernisation and deployment of critical equipment and infrastructure for the management of external borders and implementation of the common visa policy that would have been unattainable through individual national budgets. This support increased the overall available resources for border control and management of migration flows across external borders, contributed to the Union's internal security, and enabled Member States to address increased pressure on borders. For instance, Cyprus was able to enhance its surveillance capabilities to manage increased migration flows, while Malta deployed four Automated Border Control (ABC) gates which greatly improved the efficiency of document verification for EU and Schengen citizens, thereby bolstering border security ([140]). Moreover, in Belgium, Switzerland, Latvia, Lithuania, France, Finland, Italy, Liechtenstein, and the Netherlands, the financial assistance provided by the Instrument enabled strategic projects focused on the modernisation and improvement of IT systems that enhanced these countries' capacity to

([140]) AIR 2023.

meet EU requirements and standards ([141]). In Slovakia, Poland, the Czech Republic, Germany, Iceland, and Sweden the Instrument enabled the implementation of large-scale projects that would have been difficult to finance without EU support ([142]).

Without the support of the Instrument, eight Member States report that they would have struggled to implement essential Union policies effectively. In Italy, the Ministry of Foreign Affairs and International Cooperation reported that while some initiatives, such as the VIS system, could proceed independently, they would have faced notable resource constraints and reduced quality standards ([143]). The Instrument enabled Italy to uphold Union-mandated excellence in its systems, without diverting vital resources from other priorities. Similarly, in Sweden, the digitalisation projects within the Swedish Customs and the Radiation Safety Authority would likely have been delayed, limiting Sweden's capacity for compliance and strategic growth in critical areas ([144]). This difficulty in independent implementation was echoed across various Member States. For instance, Poland highlighted that without the ISF-BV, it would have been unable to meet its extensive needs for modernising external borders infrastructure, a current government priority ([145]). Similarly, Romania reported that it would have struggled to meet the Schengen border control standards, as national budget alone could not adequately have supported essential IT and infrastructure needs ([146]). Spain reported that, without the Instrument, only minimum border and visa requirements would have been met, far short of the efficiency and speed achieved with the ISF-BV support, such as the modern ABC gates and biometric systems that enable streamlined border crossings ([147]). Norway similarly noted that without the EU support provided through the ISF-BV, some projects would have been postponed or scaled down. This funding made it possible to prioritise key actions and maintain high standards in visa and border management ([148]). Notably, without the support provided by the Specific Actions, activities implemented by Belgium would reportedly have been more limited and would have lacked the broader international collaboration that the Union framework enabled ([149]). Finally, Croatia highlighted the importance of Union support, especially through EMAS as a critical solution for filling financial gaps resulting from changing activities at its external border ([150]).

In seven **Member States**, essential actions to comply with EU policies would still have been undertaken, albeit with reduced reach, quality, and timeliness due to the absence of EU funding ([151]). For instance, while the **Czech Republic, Germany, Estonia, Hungary, Lithuania, Luxembourg, the Netherlands**, and **Slovakia** would have implemented necessary measures, the scale and efficiency of these actions would have been significantly compromised. Many activities would proceed at a slower pace, leading to delays in high-priority projects and limited resources for critical IT systems and data sharing initiatives.

([141]) National ex-post evaluations for Belgium, Switzerland, Latvia, Lithuania, France, Finland, Italy, Liechtenstein, the Netherlands.
([142]) AIR 2023 for Slovakia, National ex-post evaluation for Poland, Czech Republic, Germany and Iceland.
([143]) Country case study: Italy.
([144]) National Ex-post Evaluation: Sweden.
([145]) Country case study: Poland.
([146]) Country case study Romania.
([147]) Country case study Spain.
([148]) Country case study Norway.
([149]) Thematic case study: Specific Actions.
([150]) Country case study: Croatia.
([151]) National ex-post evaluation for: Czech Republic, Germany, Estonia, Hungary, Lithuania, Luxembourg, the Netherlands, Slovakia.

Overall, the lack of EU support would hinder the effectiveness of compliance efforts across these countries.

Notably, only **Lichtenstein** and **Switzerland** reported that they would have been able to carry out all necessary activities to comply with Schengen requirements without the support of the ISF-BV, although in the case of Lichtenstein, these actions would have been less innovative ([152]).

Consequences of an interruption of the support provided by ISF-BV

Eighteen Member States plus Iceland and Norway reported, in the national ex-post evaluations, that an interruption in Instrument support would pose challenges, risking setbacks to critical operations, while only Switzerland and Lichtenstein reported that an interruption of the Instrument would only have minor consequences ([153]).

In **Italy**, for example, discontinuation of the ISF-BV could force a cut back on technologically advanced tools and potentially a scaling down of operational scope ([154]). **Sweden** would also see diminished capacity for crime detection and international collaboration. Projects like EUROSUR II, which aim to enhance national reporting to Frontex and contribute to the achievement of several Schengen requirements, are crucial for Sweden's secure border management. A funding interruption would likely diminish Sweden's ability to comply with EU border control standards ([155]). **Croatia** also voiced concerns over reduced efficiency in border and visa management should the ISF-BV funding cease. Beneficiaries noted that relying solely on national resources could lead to reduced priority actions and compromise the final quality of outputs ([156]). Romania emphasised that without the ISF-BV funding, the country would struggle to maintain its border surveillance capabilities along the EU's Eastern frontier, critical for both Romanian and EU citizens' security ([157]). **Spain** highlighted that the high-standard systems currently supporting swift border processing could not be maintained, risking delays in visa issuance and border crossings by reverting to outdated processes ([158]). **Norway** noted the importance of the ISF-BV as a catalyst for otherwise delayed or reduced projects, stressing the operational setbacks that would accompany a funding interruption ([159]).

Belgium, **Estonia, Finland, Lithuania** would face challenges in maintaining the scale of their IT projects, which are essential for meeting EU regulatory obligations and improving data sharing. Without EU funding, the pace of modernisation would slow down, reducing efficiency in border management ([160]). In countries such as **Cyprus** and the **Czech Republic**, where national budgets are more constrained, the interruption of support would force authorities to scale down or delay essential investments in surveillance equipment, infrastructure, and training ([161]). In **Luxembourg, Sweden** and the **Netherlands**, although the national budget is not as constrained, initiatives would still need to be downsized ([162]).

([152]) National ex post evaluation for: Lichtenstein and Switzerland.
([153]) National ex-post evaluation.
([154]) National Ex-post Evaluation: Italy.
([155]) National Ex-post Evaluation: Sweden.
([156]) Country case study: Croatia.
([157]) Country case study: Romania.
([158]) Country case study: Spain.
([159]) Country case study: Norway.
([160]) National ex-post evaluation.
([161]) National ex-post evaluation.
([162]) National ex-post evaluation.

Germany, France, Hungary, Iceland, Malta, Poland would experience delays in high-priority initiatives related to compliance with EU requirements, as well as limitations in information exchange and data infrastructure development ([163]). Non-permanent tasks, which are often dependent on EU funding, would be particularly vulnerable.

Union-level benefits resulting from actions funded by the Instrument

The funded actions have collectively contributed to Union-level benefits, with Member States achieving outcomes that reinforce the Schengen area's operational stability. Sixteen Member States were able to enhance their border security, leading to an overall enhanced border security management and harmonisation of procedures at the EU level ([164]). For example, Italy's initiatives strengthened consular capacities and Schengen visa issuance procedures, ensuring seamless operations in the VIS system that benefit all Schengen States ([165]). In Sweden, projects such as EUROSUR II improved intelligence sharing and response to border threats. The integration of these systems within EU security frameworks also elevated Sweden's and the EU's collective border management capabilities, reinforcing the European Area of Freedom, Security, and Justice ([166]). Greece's use of the ISF-BV to support transnational actions and interoperability of IT systems has bolstered Union-wide benefits by improving cooperation on visa policies and border management. These efforts align with the EU's shared responsibilities under the EBCG Regulation, ensuring a more integrated and efficient approach to external border control ([167]). Spain underscored the ISF-BV's role in harmonising border security approaches across the Schengen area, facilitated by advanced systems such as the SIS and VIS, creating faster interconnected processes that streamline border checks ([168]). Norway highlighted that in-person consular training enabled by the Instrument has improved service quality, with beneficiaries reporting that face-to-face engagement fosters ongoing cross-border communication, which in turn enhances EU-level operational coordination in migration and visa policies ([169]). Moreover, as discussed in the answer to the previous EQ, the ISF-BV initiatives resulted in enhanced cooperation among Member States, clearly providing benefits at the Union level, as the enhanced cooperation led to an improvement in visa management and border control at the EU-level ([170]).

11 EU Member States reported that the ISF-BV implementation led to enhanced cooperation among Member States at the EU level ([171]). In addition, Switzerland, Lichtenstein and Norway managed to strengthen their cooperation with the EU through the ISF-BV initiatives ([172]). With regard to cooperation beyond the EU, as confirmed by EU-level stakeholders, the ISF-BV implementation fostered long-term professional engagements between EU Member States and third countries ([173]). In this regard, Specific Actions also played a pivotal role. For instance, the Consular Cooperation Mechanism

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([163]) National ex-post evaluation.
([164]) National ex-post evaluation for: Austria, Switzerland, Estonia, Spain, Finland, France, Iceland, Italy, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Slovenia, Slovakia.
([165]) National Ex-post Evaluation: Italy.
([166]) National Ex-post Evaluation: Sweden.
([167]) Country case study: Italy, Greece.
([168]) Country case study: Spain
([169]) Country case study: Norway.
([170]) National ex-post evaluation.
([171]) National ex-post evaluation for: Austria, Belgium, Germany, Finland, Luxembourg, Malta, Poland, Slovenia, Slovakia, Czech Republic, Sweden.
([172]) National ex-post evaluation for: Switzerland, Lichtenstein, Norway.
([173]) EU-level interviews: Interview 1, Interview 10.

(CCM) provided Belgium and other Member States with a framework to jointly address issues such as document forgery and visa shopping, further proving that shared resources and intelligence could strengthen the security and integrity of Schengen visas ([174]). This enhanced cooperation led to an improvement in visa management and border control at the EU-level, with clear benefits for the Union.

Survey results, however, show a lack of awareness causing a limited perception of the direct benefit of funded actions at the Union level ([175]). National Authorities, while largely unaware of specific policy changes prompted by the ISF-BV, did acknowledge some impacts. For example, Estonia and Lithuania reported that ISF-BV-supported advancements led to alignment with Union initiatives such as EES and ETIAS, which necessitated legal adjustments and infrastructure improvements to meet Union standards. However, other stakeholders and beneficiaries were generally less aware of ISF-BV's policy influence. Although a few examples, such as Belgium's adoption of the ETIAS law and France's reference to the Community Visa Code, highlight some influence, the limited awareness across these groups suggests that ISF-BV contributions to Union-level benefits might be understated.

Added value of operating support

Operating support under the ISF-BV proved to be instrumental to ensuring the smooth and secure operation of critical border management and visa systems across the EU. This support encompassed expenses related to operations, personnel, and services, as well as the enhancement or replacement of equipment, real estate, and the management of operational systems, including the SIS, VIS, and any systems to be introduced. Reportedly, multiple Member States used operating support to improve the IT infrastructure and ensure system stability ([176]). At the same time, the importance of operating support in maintaining service continuity above all in light of 2022 events was highlighted, when the Member States were dealing with both COVID-19 challenges and heightened border control needs ([177]). In this regard, despite the pressures of pandemic restrictions on travel, funds allocated to operational support kept systems and equipment functioning optimally, ensuring that security and visa-processing capabilities remained uninterrupted. The financial support provided by the ISF-BV for operational costs also acts as a solidarity mechanism, assisting Member States with extensive external borders by subsidising high-cost infrastructure and maintenance needs. By way of example:

- Finland: Operating support helped fund new automated control points at high-traffic areas like Helsinki-Vantaa International Airport, which improved both visa and border control processing efficiency ([178]).

- Poland: Under operating support, the project "Purchase of mobile sets controllers for cooperation with SIS/VIS systems" enabled the replacement of equipment and software for border traffic control, thus enhancing state border protection ([179]).

([174]) Thematic case study: Specific Actions.
([175]) Targeted survey at National Authorities, Beneficiaries and Other Stakeholders: Q38 – Q26 – Q31.
([176]) National Programmes: Belgium, France, Croatia, Sweden; Annual Implementation Reports: Hungary; National ex-post evaluations: Austria, Germany.
Country case studies: Czech Republic, Italy, Romania.
([177]) Annual Implementation Report: Finland.
([178]) Annual Implementation Report: Finland.
([179]) AIR 2023.

- Romania: Operating support enabled the implementation of projects that enhanced border control and surveillance capabilities. In particular, these projects improved intervention capacity in border areas and contributed to the Union uniform and high-quality control of external borders ([180]).

- Belgium: Operating support enabled sustainable financing for strategic projects, improving the quality of services and ensuring that Belgium can meet its obligations effectively ([181]).

- Spain: Operating support enabled the financing of essential operational costs, ensuring that public authorities can maintain and improve their services in line with EU objectives ([182]).

- In Italy and Malta, operating support provided essential funding for the maintenance and upgrading of border management systems (e.g. the VIS system), ensuring that both could meet their obligations effectively ([183]).

- In Norway and Luxembourg, operating support improved the capacity of public authorities by funding the development of crisis management procedures and new IT systems ([184]).

- Lithuania: Operating support was used to upgrade IT and communication systems, ensuring that border guards and visa services could operate effectively. This includes maintaining and updating systems essential for monitoring and documentation verification ([185]).

Overall, **the main added value of operating support is that it ensures that both visa processing and border security systems are fully operational**, contributing to simplified means to achieve the strategic goals of the ISF-BV programme and enhancing the EU's border and visa management capabilities.

4.2.2 Sustainability

Are the positive effects of the projects supported by the Instrument likely to last when the support from ISF will be over?

Available evidence suggests that the positive effects of ISF-BV-supported projects are likely to last beyond the funding period, particularly where sustainability was prioritised from the outset through capacity-building, alignment with national strategies, and the integration of project outputs into long-term operational frameworks. While the extent and consistency of these efforts varied, most Member States implemented concrete mechanisms - such as maintenance planning, training programmes, and oversight tools - that support continued use of ISF-funded infrastructure, equipment, and systems.

The evaluation identified strong sustainability trends in Member States where national authorities required sustainability plans at the application stage, embedded post-completion assessments into implementation frameworks, and allocated national funding

([180]) Country case study: Romania.
([181]) National ex-post evaluation: Belgium.
([182]) National ex-post evaluation: Spain.
([183]) National ex-post evaluation: Italy and Malta.
([184]) National ex-post evaluation: Norway and Luxembourg.
([185]) National ex-post evaluation: Lithuania.

to ensure continuity. Capacity-building efforts - notably in IT, border control, and visa management - also contributed to long-term impact, though follow-up mechanisms to assess knowledge retention were often missing. The integration of ISF-BV investments into national security strategies further reinforced their durability. At the same time, some challenges remain. The monitoring of sustainability was not systematic across all Member States, and in some cases, reliance on national budgets for maintenance of high-cost infrastructure – particularly of IT systems - poses a potential risk to long-term viability. Where reliance on Union funding is high, sustainability may be more fragile in the absence of structured financial planning. The Instrument's operating support instrument enables long-term use of infrastructure and systems by covering maintenance and staffing costs. Notably, the overlap between the ISF-BV and the BMVI (2021–mid-2024) ensures continuity in funding for infrastructure, equipment, and large-scale IT systems. This combination of flexible funding and transition mechanisms was critical to sustaining investments beyond the original project timeframe. A detailed analysis of the mechanisms and outcomes underpinning project sustainability is presented in the answers to the sub-questions below.

4.2.2.1 Assessment of mechanisms to ensure sustainability

Evidence from country case studies, surveys, annual implementation reports, and ex-post evaluations of the national programmes indicates that Member States integrated sustainability considerations directly into project planning phases, requiring beneficiaries to present sustainability strategies for continued impact, although the depth and consistency of these efforts varied. It is important to note that this analysis is based on the subset of countries for which relevant data on sustainability was available – namely, all eight country case studies, five of the 90 annual implementation reports, 25 ex-post evaluation reports, and three online survey responses.

Further evidence from ex-post evaluation reports of national programmes confirms that in addition to requiring beneficiaries to plan for post-funding sustainability, four Member States embedded sustainability considerations into national funding strategies from the outset. For instance, Finland ([186]) and Estonia ([187]) required applicants to submit sustainability plans when applying for the ISF-BV support, ensuring that operational costs would be covered through national budgets beyond the funding period. Similarly, Belgium ([188]) and the Netherlands ([189]) linked project selection to their integration within broader European and national security frameworks, reinforcing long-term sustainability through institutional anchoring. For other Member States, the available reports do not explicitly indicate whether sustainability was embedded in national funding strategies from the beginning. While various sustainability measures were implemented during project execution, it remains unclear whether these were systematically planned at the programming stage. These aspects are further analysed in the following paragraphs, where specific measures adopted during implementation are examined in more detail.

Complementing these trends, evidence from interviews and individual country case studies also suggests that at the project design level, specific sustainability project outputs were embedded into the project application and selection process. For instance, in Bulgaria and Poland, applicants were required to define a "sustainability period" during which the

([186]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Finland.
([187]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Estonia.
([188]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Belgium.
([189]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Netherlands.

project would remain operational – typically three years for IT systems and up to ten years for infrastructure projects ([190]). Sustainability plans were formalised during project planning to ensure alignment with national priorities and resources, promoting the integration of projects into long-term frameworks. In Italy, beneficiaries were asked to describe how project outcomes would be sustained over a five-year period, with many indicating reliance on national funds ([191]). This approach aimed to align ISF-BV-funded actions with national priorities and facilitate their integration into long-term security planning, thereby laying the groundwork for continuity after the funding period.

The analysis of ex-post evaluation reports of the national programmes has revealed that a common trend among 10 countries was the establishment of sustainability checks at the implementation stage through national oversight mechanisms. Estonia ([192]), Lithuania ([193]), and Finland ([194]) embedded sustainability monitoring into their national implementation programmes, requiring periodic project assessments beyond the funding period. Similarly, Luxembourg ([195]) and Malta ([196]) committed national budgets to finance operational costs where ISF funding was no longer available, ensuring the continued use of infrastructure, IT systems, and security equipment. Furthermore, the Czech Republic ([197]) and Hungary ([198]) introduced project-level sustainability indicators, requiring beneficiaries to maintain performance levels through mandatory reporting and sample checks. Additional Member States implemented sustainability oversight measures through structured evaluations, reporting requirements, and standardised procedures. Compliance with sustainability obligations was ensured in some cases through ex-post evaluations on selected ISF-funded projects, extending monitoring beyond project completion (Poland) ([199]). Sustainability assessments were also embedded into final reporting frameworks, creating a formalised, though less frequent, mechanism for national-level oversight (Sweden) ([200]). In some cases, sustainability monitoring was reinforced through standardised training materials and procedural guidelines, helping to maintain project results in the long term (Norway) ([201]). For other Member States, the available reports do not provide sufficient details on whether national oversight mechanisms were systematically implemented.

Evidence from five out of eight country case studies indicates that, at the implementation stage, Member States implemented mechanisms to monitor and verify project sustainability through a structured framework. In Poland, the responsible authority monitors the sustainability of projects with minimum operational period based on project type (e.g., three years for IT systems, five years for vehicles, and ten years for larger infrastructure). In some cases, such requirements also reflected EU-level expectations, particularly for border surveillance equipment included in the Technical Equipment Pool (TEP) coordinated by Frontex. Through this monitoring mechanism, Poland ensures that equipment and infrastructure funded by the ISF-BV are maintained and remain functional

([190]) Interview with Bulgarian responsible authority (Interim Evaluation of the ISF-BV).
([191]) Country case study – Italy.
([192]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Estonia.
([193]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Lithuania.
([194]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Finland.
([195]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Luxembourg.
([196]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Malta.
([197]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Czech Republic.
([198]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Hungary.
([199]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Poland.
([200]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Sweden.
([201]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Norway.

well beyond the project's end date ([202]). Similarly, Romania incorporated ex-post verification, allowing for annual durability assessments that ensure infrastructure and IT systems remain functional for their intended lifespan ([203]). Another sustainability-focused approach during implementation involved provisions for technical support to reduce ongoing maintenance costs, as well as staff training sessions that contributed to long-term sustainability by equipping personnel to operate new equipment, such as Coast Guard vessels (Greece) ([204]). In some cases, such as in infrastructure projects, operational continuity was supported through ongoing staff training and operational support measures to maintain service delivery ([205]). This combination of technical support and skills transfer underlines the commitment to fostering the continued effectiveness of project outcomes post-ISF-BV. While some equipment, such as IT software, may need updates over time, beneficiaries had accounted for long-term maintenance by integrating these requirements into national budgets (Croatia). As highlighted in the Croatian country case study, beneficiaries expressed confidence that these projects would remain effective beyond the ISF-BV funding period due to their alignment with larger national frameworks and ongoing projects, such as active 2021-2027 BMVI projects that build upon ISF-BV achievements ([206]).

Evidence from four annual implementation reports covering two Member States illustrates how robust national monitoring frameworks can contribute to the long-term sustainability of ISF-BV-supported projects. In these cases, beneficiaries were legally required to maintain achieved target values and meet designated monitoring indicators, subject to regular compliance checks. In Poland, for instance, these sustainability obligations were enforced through administrative and on-site inspections, reinforcing the national commitment to post-project impact ([207]). In the 2022 financial year alone, six project sustainability audits were conducted to verify compliance. Similarly, in Czechia, beneficiaries were required to report on both set and statistical indicators throughout and after the project period, with the responsible authority tasked with overseeing and verifying reported outcomes ([208]). While limited to a small sample of Member States, these examples highlight the potential role of structured compliance mechanisms in enhancing the durability of project results.

One of the trends observed in limited number of ex-post evaluation reports of the national programmes across four countries was the reliance on EU funding as a complementary mechanism for long-term sustainability. While Slovenia ([209]) and Slovakia ([210]) highlighted that national budget constraints limited the ability to sustain projects at the same scale post-ISF, they ensured continuity by integrating ISF-supported infrastructure and IT systems into national operations. Additionally, countries such as Germany ([211]) and Liechtenstein ([212]) leveraged their obligations under Schengen regulations to maintain and

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([202]) Country case study – Poland.
([203]) Country case study – Romania.
([204]) Country case study – Greece.
([205]) Country case study – Spain.
([206]) Country case study – Croatia.
([207]) Annual implementation report for the financial year 2022 of Poland National Program ISF.
([208]) Annual implementation reports for the financial years 2020, 2021 and 2022 of Czech National Programme ISF.
([209]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Slovenia.
([210]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Slovakia.
([211]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Germany.
([212]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Lichtenstein.

update security systems, ensuring compliance-driven sustainability beyond the funding period.

Online survey responses from national authorities within Member States suggests that the efforts were made to establish sound sustainability measures at both the programming and implementation stages, although a majority either did not know or preferred not to answer. In the survey, 16% of respondents confirmed that they had adopted comprehensive measures, and an additional 14% had moderately adopted measures to ensure the continuity of ISF-BV project results, including long-term strategic planning, investments in infrastructure, and integration with national budgets. Some respondents highlighted the use of specific earmarking periods to sustain resources for up to ten years, depending on the type of project. For instance, as specified in the responses to the survey, IT equipment is often required to be maintained for a minimum of three years, while infrastructure assets are expected to remain operational for up to ten years ([213]). A further 10% indicated that they had not yet adopted such measures but planned to do so. 4% declared no consideration of specific sustainable measures, while the majority - 57% - either did not know or preferred not to answer.

In summary, these examples reflect a common strategy across the Member States to embed sustainability measures in both the programming and implementation phases, thereby enhancing the likelihood of sustained impact. Through mechanisms like required maintenance plans, alignment with national priorities, and periodic post-completion monitoring, Member States have taken structured steps to ensure that the benefits of ISF-BV-funded projects extend well beyond the initial funding period.

Evidence from the ex-post evaluation reports, country case studies, and online survey of national authorities suggests that capacity-building and training activities played a meaningful role in enhancing the sustainability of ISF-BV supported projects.

As explicitly highlighted in 12 ex-post evaluations of the national programmes, this trend was further reinforced by national strategies emphasising long-term knowledge retention. Norway ([214]) and Sweden ([215]) standardised training materials to ensure their usability beyond the funding period, while Lithuania ([216]) and Luxembourg ([217]) developed technical training programmes for IT system maintenance. Finland ([218]) institutionalised sustainability reporting as part of project evaluations, ensuring that capacity-building was monitored as a key factor in project impact. Additionally, Hungary ([219]) introduced maintenance reports as part of long-term project assessments, verifying that trained personnel continued to apply acquired skills. Across other Member States, training and capacity-building efforts were widely implemented, but their integration into long-term sustainability strategies varied. In some cases, training was tied directly to specific ISF-funded projects, ensuring that personnel were equipped to operate new systems and technologies, but without structured follow-up mechanisms to evaluate long-term knowledge retention (Spain, Estonia, Malta) ([220]). Germany incorporated training into broader security frameworks, aligning it with existing institutional structures, yet without

([213]) Results from the online survey.
([214]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Norway.
([215]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Sweden.
([216]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Lithuania.
([217]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Luxembourg.
([218]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Finland.
([219]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Hungary.
([220]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Spain, Estonia, Malta.

dedicated follow-up measures to assess its continued impact ([221]). Some Member States assumed that skills transfer would be maintained organically by integrating trained personnel into national agencies or operational structures, but without formalised policies or monitoring frameworks to ensure continuity (Poland, Iceland) ([222]).

Although the country case studies did not provide detailed accounts of staff training activities, making it difficult to assess their overall scale, several nonetheless included examples suggesting that training contributed to project sustainability. In particular, cases from Greece, Spain, Poland, Romania, and Croatia highlighted how trained personnel were able to support the continued operation of systems and infrastructure beyond the funding period. Many trained personnel are now equipped to independently manage acquired systems and infrastructure. Sustained capacity-building activities, including training for border and coast guard personnel, were designed to create enduring knowledge and skill sets that could be leveraged beyond ISF-BV support ([223]). Training programmes were designed not only to improve operational skills but also to encourage a high level of knowledge retention and institutional expertise within the national authorities. For instance, personnel trained in EU visa policy under the ISF-BV have taken on leadership roles in the Polish Ministry of Foreign Affairs, overseeing the implementation of EU IT systems related to visa processes ([224]). However, evidence also highlights that ongoing capacity-building is needed in areas requiring regular updates and investments, such as technical support for IT infrastructure and consular training due to changing regulations and staff rotations ([225]).

Online survey feedback highlights the perceived effectiveness of training in supporting the sustainability of ISF-BV projects. Several survey respondents noted that training sessions provided essential skills that enabled staff to independently manage acquired systems, especially in areas requiring ongoing technical expertise such as IT infrastructure and border security ([226]).

4.2.2.2 Assessment of action and result sustainability

Outcomes from ISF-BV projects, particularly in infrastructure and equipment, show a positive trend towards sustainability. Evidence from ex-post evaluations of national programmes confirms this positive sustainability trend in at least seven countries ([227]), where national authorities have secured operational budgets and embedded ISF-funded investments into routine operations. Infrastructure and equipment, including surveillance systems, border control technology, and IT solutions, have been integrated into national security frameworks, ensuring their continued use ([228]). In Lithuania, Norway, and Luxembourg, investments in fixed assets such as biometric systems, automated border control, and mobile identity verification devices have been prioritised for long-term operational planning ([229]). Additionally, Sweden ([230]) has ensured sustainability through

([221]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Germany.
([222]) Ex-post evaluation of the National Programme of the ISF 2014-2020 – Poland, Iceland.
([223]) Country case studies – Greece, Spain, Romania and Croatia.
([224]) Country case study – Poland.
([225]) Country case study – Norway.
([226]) Results from the online surveys.
([227]) Slovakia, Sweden, Lithuania, Norway, Luxembourg, Malta, and Iceland.
([228]) Ex-post evaluation of the National Programme – Slovakia, Sweden, Lithuania, Norway, Luxembourg, Iceland.
([229]) Ex-post evaluation of the National Programme – Lithuania, Norway, Luxembourg.
([230]) Ex-post evaluation of the National Programme – Sweden.

structured maintenance agreements, while Iceland [231] secured operational budgets, allowing continued functionality beyond the ISF-BV period. Malta has further reinforced sustainability commitments through legally binding obligations requiring the continued use of ISF-funded infrastructure for extended periods, while Luxembourg has ensured sustainability through long-term commitments integrated into national and EU security frameworks [232].

Further case study evidence from Croatia, Greece, and Norway suggests that infrastructure investments in equipment and IT systems are designed to have enduring impacts, as these systems were explicitly selected based on national needs aligned with EU security objectives. In Greece, staff training and technical support have helped ensure that the Coast Guard can continue operating new vessels acquired under the ISF-BV [233]. Furthermore, Member States, such as Italy and Poland, have indicated commitments to utilise national funds for the maintenance of infrastructure and systems acquired through ISF-BV projects, highlighting a strategy aimed at ensuring long-term sustainability beyond the Union funding period [234].

However, reliance on ISF-BV support for technical and operational expenses may present a sustainability challenge, especially for projects involving high-cost maintenance items such as IT systems and specialised equipment. The ex-post evaluations of the national programmes of Spain and Cyprus highlight ongoing maintenance costs as a key concern, particularly where national budgets are constrained. Additionally, the ex-post evaluation of Liechtenstein notes that while some security systems, such as ETIAS and EES, are expected to have a long-term impact, their sustainability cannot yet be determined with certainty, reinforcing the importance of structured national funding mechanisms to ensure continuity.

Operating support mechanisms within the ISF-BV have proven essential for maintaining infrastructure and IT systems, yet stakeholder feedback highlights the need for improved long-term planning.

The analysis of all ex-post evaluations of national programmes further emphasises measures taken to ensure the continuity of ISF-supported activities through operating support, though only in a limited number of reports. As previously noted, securing operational budgets and establishing structured maintenance agreements have allowed security-related infrastructure and IT systems to remain functional beyond the ISF-BV period (Sweden, Luxembourg) [235]. Additionally, in Norway, maintenance costs for ISF-funded equipment have remained manageable, ensuring continued use within national security frameworks [236]. Some Member States have further reinforced sustainability by embedding maintenance planning into national security policies or leveraging additional funding sources to cover ongoing costs (Luxembourg, Cyprus). However, challenges persist where reliance on Union funding remains high, particularly for the upkeep of high-maintenance assets such as surveillance systems and border management technology, raising concerns over financial sustainability post-ISF-BV (Cyprus, Liechtenstein).

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[231] Ex-post evaluation of the National Programme – Iceland.
[232] Ex-post evaluation of the National Programme – Malta, Luxembourg.
[233] Country case studies – Croatia, Greece and Norway.
[234] Country case studies – Italy and Poland.
[235] Ex-post evaluation of the National Programme – Sweden, Luxembourg.
[236] Ex-post evaluation of the National Programme – Norway.

The ISF-BV operating support was instrumental to covering the costs associated with the upkeep of critical infrastructure and IT systems, ensuring that project outcomes continued even after the end of initial funding. The operating support, as outlined in Regulation (EU) No 515/2014, allows Member States to allocate up to 40% of their national programme budgets to support ongoing operational activities. This includes funding for staff costs, training, maintenance of equipment, IT systems management, and infrastructure upkeep ([237]). Notably, the practical overlap in the implementation periods of ISF-BV and the BMVI - spanning approximately three and a half years from 2021 to mid-2024 - has helped to ensure continuity in funding for maintenance costs related to infrastructure, equipment, and large-scale IT systems. This overlap provided a bridge for Member States to continue financing essential functions beyond the original ISF-BV timeframe.

Examples from three country case studies illustrate how operating support has been effectively utilised to sustain critical functions. In Greece, for instance, operating support played a pivotal role in ensuring the maintenance and repair of Coast Guard vessels acquired through the ISF-BV. These vessels were essential for maritime border surveillance, and the allocated funds ensured they remained fully operational even after the initial project funding had ended. Greek stakeholders emphasised that without this operating support, the ability to maintain these high-cost assets would have been severely compromised, potentially undermining border management efforts ([238]). Similarly, in Poland operating support was utilised to maintain critical IT systems essential for efficient border control and visa management. This included covering service costs, staff training, and system upgrades necessary to keep these systems operational beyond the project funding period ([239]). In Spain, operating support was also leveraged to enhance staff capabilities, particularly through training programmes aimed at building long-term institutional knowledge. The focus on capacity-building ensured that personnel managing border control systems were adequately trained to handle the equipment and systems independently. Spanish authorities noted that this investment in human resources not only improved the immediate effectiveness of border management operations but also helped secure the long-term sustainability of these initiatives by reducing their reliance on external technical support ([240]).

4.3 Is the intervention still relevant?

4.3.1 Relevance

Did the objectives of the interventions funded by the ISF-BV correspond to the actual needs?

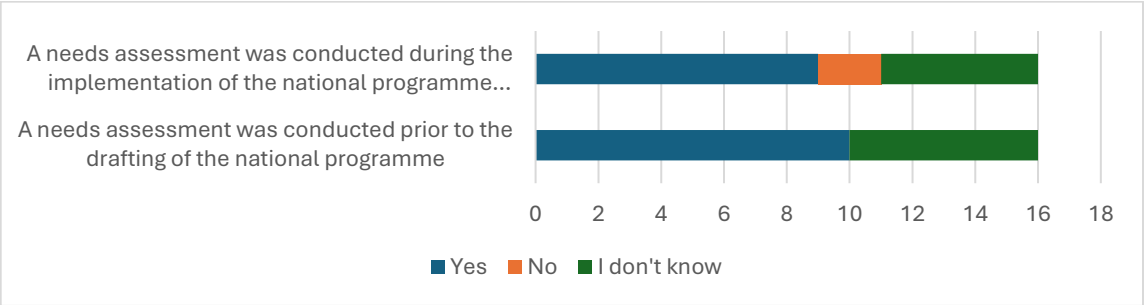
4.3.1.1 Member States' programmes' objectives addressed identified needs.

The design of the Member States' national programmes was supported by a consultation process, which ensured that the programmes' priorities and objectives responded to the key needs identified at the EU and national level at the time of their adoption. At the EU level, the consultation process consisted of a policy dialogue between the Commission and the Member States, which took into account the difficulties encountered during the EBF programming cycle (2007-2013) as well as the new and emerging needs foreseen at the time of the ISF-BV. At the national level, needs

([237]) Annex III, of the ISF-BV regulation.
([238]) Country case study – Greece.
([239]) Country case study – Poland.
([240]) Country case study – Spain.

assessments were conducted with key national stakeholders to develop national objectives and prioritise the actions most relevant to their national needs. The process varied across Member States but typically included an assessment of national strategic documents defining long-term goals and priorities and consultations with potential beneficiaries to collect their input. This was confirmed through the country case studies and the survey with implementing national authorities, whereby respondents for 10 of the 13 countries represented in the survey confirmed having conducted a needs assessment prior to drafting their national Programme (respondents of the remaining countries replied not knowing).

Figure 19 - Number of Member States that conducted needs assessment (N=16)



Source: survey of national authorities

This was also confirmed by country-level evaluation reports, which highlighted the bottom-up approach to programme design, i.e. the involvement of relevant stakeholders and potential beneficiaries that allowed for the identification of real needs and the development of relevant objectives (for instance in Austria, Czechia, Spain and the Netherlands). The programmes were also developed to address specific priorities, such as compliance with Schengen *acquis* (e.g., Iceland and Liechtenstein) or acquisition of digital technologies (Italy).

The objectives and activities of Member States' national programmes addressed the key needs of the EU and its Member States throughout the ISF-BV's implementation. Stakeholders consulted confirmed the alignment of Member States' national programmes with their needs, noting that the ISF-BV objectives and scope of activities were sufficiently broad to enable the national programmes to be tailored to the specific needs of Member States.

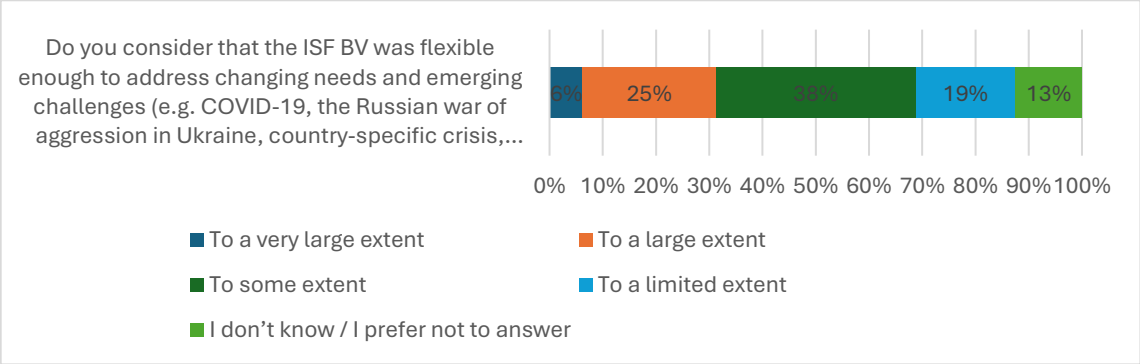
Regarding the national programmes' objectives, the stronger importance given to border management compared to visas was positively highlighted, enabling Member States to prioritise actions that respond to their more urgent needs related to the migration crisis at the time. In this light, all Member States' national programmes allocated more resources under the objective on borders than visa.

Regarding the type of activities funded under the national programmes' objectives, these were also highlighted as relevant in addressing the specific needs identified in Member States' national programmes, with activities deemed most relevant to national stakeholders receiving the most funding. As further detailed in the needs assessment annexed to this report, these were activities related to the development, upgrading, implementation and operationalisation of large-scale IT systems (and in particular, those required for border control and surveillance).

The general relevance of the objectives of the national programmes was also confirmed in national-level evaluation reports. Across the evaluations, the objectives of the ISF-BV-funded interventions were largely relevant and responsive to identified needs. Member States' national programmes were based on a methodology that lacked sufficient foresight analysis to accurately plan for longer-term needs. In 2021, following the EBCG Regulation (EU) 2019/1896, a new methodology was introduced for contingency and national capability plans based on a new planning framework that incorporated a needs assessment based on scenarios derived from risk analysis through applying the Common Integrated Risk Analysis Model (CIRAM). These scenarios reflect the possible evolution of the situation at the external borders regarding irregular migration, as well as the challenges identified in the multi-annual strategic policy cycle for EIBM. They consider both 1) short-term needs in the case of operational and contingency planning and 2) mid- to long-term needs in the case of contingency and capability development planning ([241]). Under BMVI, Member States ensured that the needs identified in this exercise are reflected and addressed in their programmes. In contrast, as reported by interviewees, under ISF-BV, needs assessments were not based on a forward-looking methodology but rather on past historical trends to plan for the coming years. As reported by stakeholders, this meant that Member States' national programmes did not sufficiently capture and plan for how the rapidly changing context of border management may evolve and impact their longer-term needs.

However, despite the fact that ISF-BV programming was based on historical data, the flexibility of the national programmes ensured that their objectives and planned activities could be adapted to the evolving context of border management and thus better respond to evolving needs throughout the implementation of the Instrument (2014-2020). Most implementing national authorities consulted through the survey considered the national programmes to be flexible to a "very large" (13%) or "large" (38%) extent ([242]).

Figure 20 - ISF-BV flexibility to address changing needs



The national-level evaluations noted that the ISF-BV demonstrated flexibility in adapting to changing circumstances and emerging needs. Some evaluations highlighted that during the programming period, the context in which the programme operates changed significantly, putting pressure on the flexibility of programme implementation. However, according to evaluations, the programme has been successfully amended during the period, in some cases multiple times (e.g., in Slovakia). This adaptability contributed to the continued relevance of the objectives throughout the implementation period. Adaptability was also enhanced by reallocating funds to support critical projects, for instance in Cyprus.

([241]) Frontex, 2023, Contingency Planning.
([242]) 31% to "some extent", 13% "don't know/prefer not to say" and 6% to "a limited extent".

The programme also allowed for the extension of project duration in response to challenges to their timely implementation due to the COVID-19 pandemic. Similar findings from the case studies and interviews positively evidenced the flexibility of the design of the national programme with built-in mechanisms that ensure the national programmes can be adapted as needed in order to better respond to new challenges, needs and requirements and maintain their relevance over time. These include: Regular consultation with national stakeholders in most Member States in order to assess evolving needs and adapt the national programmes accordingly ([243]). The mid-term review mechanism also allowed for a more comprehensive reassessment of needs and a dialogue with the Commission, including the possibility to amend the programme where necessary.

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Changing needs based on these mechanisms were addressed through minor budgetary adjustments and transfers between the specific objectives of the national programme of up to 15 % of the basic allocation thanks to the flexibility clause in the legal base. This was considered by national authorities interviewed to be a useful tool that enabled adaptations to the changing environment and fine-tuning during the implementation cycle. While allowing flexibility to address needs at the national level, any significant changes that could impact the specific objectives or introduce new national objectives were subject to EU approval, ensuring that the national programme remained relevant to EU needs, priorities and objectives.

The objectives of the Union Actions were relevant to the needs of the EU and its Member States. As evidenced by the interim evaluation of ISF-BV and further confirmed by stakeholders consulted as part of this ex-post evaluation, Union Actions were relevant as a means to address transnational needs of particular interest to the Union as a whole (national-level evaluations did not provide specific assessment of the relevance of Union Actions). The table below demonstrates this relevance by cross-referencing the analysis of the Union Actions Annual Work Plan, which identified clusters of priorities and objectives pursued by Union Actions (first column) with the needs assessment (second column), highlighting how each Union Action objectives respond to different needs.

([243]) Among the 13 countries represented in the survey, respondents for 8 out of these countries confirmed having conducted a needs assessment during the implementation of the national programme for ISF-BV.
([244]) Among the 13 countries represented in the survey, respondents for 8 out of these countries confirmed having conducted a needs assessment during the implementation of the national programme for ISF-BV.
([245]) Art. 12 of Regulation (EU) No. 515/2014 in accordance with Council Regulation (EU) No 1053/2013 of 7 October 2013 establishing an evaluation and monitoring mechanism to verify the application of the Schengen acquis and repealing the Decision of the Executive Committee of 16 September 1998 setting up a Standing Committee on the evaluation and implementation of Schengen.

Table 7 -Assessment of the relevance of Union Actions objectives

Objectives (clusters)	Assessment of their relevance
Border Control projects focusing on strengthening security measures at the external borders by integrating advanced technologies to detect and prevent unauthorised entries	These projects target both physical and digital threats, enhancing the capabilities of border management systems through a combination of biometric and other border control innovations. They aim to prevent unlawful entries while maintaining compliance with international obligations and enhancing surveillance capabilities. This is aligned with the needs and challenges identified as part of the needs assessment, which evidenced increased security threats, including terrorism and hybrid threats, and the reported need by stakeholders consulted for more innovation to strengthen border management IT systems and tools to better address these evolving threats.
Document Security and Standardisation projects focus on enhancing the security and uniformity of essential travel and residency documents within the European Union.	These initiatives aim to improve the verification processes at border controls, minimise the risk of fraud and counterfeiting, and streamline document recognition across Member States by introducing advanced technologies and standardised formats. As above, these initiatives align with stakeholders' needs by strengthening the uptake of digitalisation (including systems, tools and databases) at the EU level, ensuring a more coherent and harmonised approach across the EU and enhancing Member States' capacity in the areas of border management and visa policy, thus facilitating legitimate travel/migration and tackling irregular immigration.
Migration Management, Cross-border Cooperation and Information Exchange projects aimed to foster collaboration among countries to improve border security and management.	These projects focus on integrating surveillance systems, enhancing communication channels, and building trust among border management personnel. As evidenced in the needs assessment, improving information exchange among Member States and with neighbouring countries was considered an important need as part of the four-tier EIBM model and in the area of visa policy. It improves real-time data sharing, situational awareness, and coordination. This was tied to the above need for IT systems that address that gap and was also noted as a need and "strategic direction" of the EU in the 2015 European Agenda on Security (246).
Training and Capacity Building projects aim to enhance the skills, knowledge, and operational capabilities of immigration and consular authorities by providing specialised training programmes	These initiatives focus on raising awareness, improving coordination, and equipping personnel with practical tools to address challenges related to migration, fraudulent visa submission and issuance, as well as legal migration pathways. Due to novelties in the EU acquis, technologies, and working methods, training was highlighted as a need in several Member States' national programmes, particularly for consular officials and visa services staff. The surveys' results evidenced similar findings, highlighting training as a relevant action that addressed a clear need within Member States throughout the implementation of the ISF-BV.

Emergency Assistance addressed identified needs.

EMAS provided funding in a flexible and tailored manner to respond to and mitigate the consequences of emergency situations with impact on EU external borders and its objectives addressed the EU and Member States' needs for solidarity. The emergency situation was defined as "an urgent and exceptional pressure where a large or disproportionate number of third-country nationals are crossing or are expected to cross the external border of one or more Member States or any other duly substantiated

(246) European Agenda on Security (2015)

emergency requiring urgent action at the external borders" ([247]). That is, while migration (particularly irregular) can result from long-term megatrends (demographic change, climate change, etc.), it can also be driven by acute crises that are not predictable but need a swift, coordinated response, such as the 2015 migration crisis in Europe. The fast-moving and unpredictable nature of migration means that Member States can face unforeseen events that risk overwhelming Member States' capacities to manage their external borders or visa processes. Beyond surges in migration, constantly shifting migratory routes also make it difficult to stem irregular migration to the EU. It requires flexibility to support Member States and SACs in response to shifting needs/surges in migration or other emergency situations in the scope of the Instrument. As evidenced in the dedicated thematic case study on the topic, EMAS addresses this need by providing funding to assist Member States who most need it by reinforcing their capacity to cope with the evolving challenges in the management of their external borders.

EMAS-funded actions remained relevant throughout the implementation of the ISF-BV, providing EUR 471 million to 11 Member States, two international organisations, and one EU Agency across 79 actions to address emergencies related to the migration crisis and its impact on Member States. Most actions were aimed at border surveillance and control, migratory pressure management, strengthening first reception services, Operational support, Search and Rescue Operations, infrastructure development and provision for legal information/interpretation for the effective management of immigration flows. Interviews with national authorities and stakeholders within the Commission confirmed the relevance of these priorities. They noted that EMAS actions helped bridge the gap and address Member States' immediate needs, which could not be met through the actions under their national programmes alone. However, some stakeholders within the Commission noted that some Member States had to use EMAS to address longer-term structural needs as opposed to its intended purpose (i.e. to support MS during emergency situations with short-term needs and provide immediate relief.). For this purpose, additional funding to ISF BV programmes was provided following the specific action for support to border control activities, particularly in those Member States confronted with high migratory pressure at the external borders launched in 2019.

5 CONCLUSIONS AND LESSONS LEARNED

5.1 Conclusions

5.1.1 Effectiveness

The ISF-BV proved effective in supporting Member States in progressing towards their objectives in the areas of visa policy and external border management. National programmes were largely completed, with high absorption rates and delivery against targets. **Despite major challenges** - including the COVID-19 pandemic, Russia's war of aggression against Ukraine, and shifting national priorities in migration and border policy - **ISF-BV activities remained on track**. The one-year extension introduced by the Commission was acknowledged as instrumental in ensuring the continuation and finalisation of key actions.

The Instrument appears to have contributed effectively to the harmonisation of the EU visa policy. It supported the development of consular infrastructure, the deployment of IT systems, such as the Visa Information System (VIS), and to the training of consular

([247]) Article 2(f) of the ISF-BV regulation.

staff. These efforts facilitated standardised visa processing across Member States and Schengen Associated Countries.

ISF-BV contributed to the more effective and uniform application of the Union acquis on visas, primarily through investments in infrastructure and training activities. These interventions improved technical readiness, interoperability, service quality and procedural coherence in visa processing. However, the depth of implementation varied across Member States. Survey results support a generally positive perception of ISF-BV's contribution, particularly among institutional stakeholders.

However, the Fund's role in expanding the geographical coverage of consular services remained limited. Most actions focused on improving existing offices rather than opening new representations, and the regression analysis suggests that consular expansion occurred largely independently of ISF-BV support. Progress in promoting consular cooperation in third countries was uneven. Only a subset of countries reported such activities, and examples of structured cooperation remained limited.

The ISF-BV played an important role in strengthening the monitoring of borders across Member States by supporting investments in infrastructure, biometric verification tools, and border guard training. These efforts resulted in tangible improvements to the effectiveness of border controls. One of the areas of progress was the preparatory work for large-scale Union-wide IT systems such as EES and ETIAS. While these systems were not yet operational by the end of the programming period, the delays observed were structural and Union-wide in nature. Countries were not expected to operationalise these systems during the 2014–2020 period but to reach a high level of technical readiness. Therefore, these delays should not be interpreted as a shortcoming in national implementation. Instead, ISF-BV funding enabled countries to lay the groundwork for future integration, aligning their national systems with Union-wide requirements and ensuring preparedness for upcoming obligations.

Documentary review, consultations and case studies confirm widespread improvements in border control effectiveness, infrastructure upgrades, and the application of Union standards. However, some Member States faced delays in project implementation or difficulties in assessing effectiveness, particularly in IT-related actions.

Emergency Assistance under the ISF-BV played a targeted and timely role in addressing acute migration and border management crises between 2014 and 2020. EMAS was most intensively used during the peak of irregular migration flows in 2015–2017, with 80 projects implemented across 11 Member States and several international actors. Although national ex-post evaluations provided limited systematic feedback on EMAS, available evidence from countries such as Greece, Spain, and Lithuania confirms that the Instrument enabled rapid deployment of resources, supported operational continuity, and addressed urgent infrastructure and coordination needs.

Operating support under Article 10 of the ISF-BV regulation played a key role in a limited number of Member States, where it was used to sustain essential visa and border management functions. In countries such as Austria, Cyprus, Finland, and Germany, it enabled the maintenance of IT systems, consular operations, and border infrastructure, particularly during periods of fluctuating demand, such as the COVID-19 pandemic.

The regression analysis indicates that ISF-BV funding may have had a positive impact on the effectiveness of integrated border management. Specifically, a statistically significant correlation was observed between expenditure under SO2 and an

increase in the number of detections of fraudulent travel at border crossing points. However, the analysis faced important limitations, particularly due to issues related to data quality and availability, which constrain the strength of the conclusions. As for SO1, the descriptive statistical analysis revealed only a weak correlation between ISF-BV operations and the establishment of new consular representations. This suggests that while some Member States used ISF-BV to support such developments, others pursued similar actions independently of the Fund.

5.1.2 Efficiency

The evaluation criterion focused on assessing the efficiency of resource utilisation in achieving its objectives. Despite data limitations ([248]), findings indicate **varying degrees of efficiency among Member States, with top-performing countries achieving substantial outcomes at lower costs, while mid-tier and low performers varied in efficiency**. The analysis, conducted for Specific Objectives 1 and 2, revealed that efficiency is influenced not only by the type of intervention but also by the specific contexts and needs of each Member State.

Under SO1, projects supporting the visa application process, equipment and software for information extraction, and consular cooperation demonstrated higher efficiency compared to other interventions. The SO2, top performers focused rather on maritime border surveillance and activities associated with EES, complemented by the development of Integrated Border Management, activities associated with the ETIAS Regulation, and initiatives aimed at enhancing the capabilities of immigration liaison officers

While acknowledging the limitations of this analysis, it is important to note that the results should not be interpreted as definitive indicators of which types of projects are more cost-effective. Instead, they underline the areas of intervention in which Member States have more difficulties in implementing cost-effective projects.

The regression analysis complemented the conclusion by confirming a positive, statistically significant relationship between ISF-BV financial expenditure in SO2 and the benefits achieved, particularly in increasing the detection of fraudulent documents at the border. Nevertheless, as MS targeted various types of interventions, the effectiveness of the interventions was not solely attributable to one specific type of intervention but rather to a mix of interventions targeted and implemented at the Member State level.

Mechanisms such as rigorous cost control, lean project management, and comprehensive risk assessments were implemented at the MS level to enhance cost-effectiveness. However, the lack of comprehensive data limits the ability to determine whether these practices are consistently applied across all Member States.

Nevertheless, **the evaluation of the ISF-BV reveals a generally positive perception of its cost-effectiveness among consulted stakeholders**, with over 70% of national authorities affirming that operations, particularly those within National Programmes, were achieved at reasonable costs.

The efficiency of the interventions was influenced by a series of factors. The **COVID-**

([248]) The analysis faced limitations due to insufficient data on the costs associated with the number of Full-Time Equivalents (FTEs) deployed by various stakeholders. Additionally, quantifying the perceived administrative burden proved challenging due to a lack of information and significant variations. Inconsistencies in how Member States establish their indicator targets were also noted.

19 pandemic significantly impacted project timelines and indicator achievements, prompting adjustments in project management and monitoring practices. Moreover, **limited staff supply** often caused project delays and increased the burden on existing staff. Price surges due to **inflation** also affected cost-effectiveness. **Public procurement** emerged as a significant factor influencing the implementation of the ISF-BV Instrument. While public procurement generally promoted cost-effectiveness, compliance with tendering procedures posed challenges in some Member States, leading to project delays, as explained in the next section.

5.1.3 Simplification and reduction of administrative burden

The Instrument introduced **a set of significant provisions with a view to simplifying funding procedures and reducing administrative burden**. Through their adoption, National Authorities and Beneficiaries experimented an effective simplification in fund management. However, **their implementation and impact were uneven**.

The introduction of the Multi-Annual Programming is widely considered the most successful simplification measure, despite the initial challenges posed by the transition from annual programming. It has indeed significantly reduced administrative burden by allowing long-term planning and resource allocation, thus ensuring a stable and predictable funding framework. Beneficiaries recognised that the possibility of designing multi-year projects significantly eased administrative burden, eliminating the need for annual reprogramming or reapplication processes. Although Multi-Annual Programming provides flexibility and reduces the administrative burden, it also requires careful planning.

National eligibility rules have been essential to enhancing the flexibility and adaptability of fund management, particularly in financial management, staff costs, and project modifications. Responsive and adaptive national eligibility rules ensured that funds remained flexible and aligned with national needs, fostering greater agility in project implementation. Despite these benefits, challenges remain, such as the need to balance flexibility with EU compliance, as well as misalignments between national and EU rules that still contribute to bureaucratic complexity.

Several Member States successfully applied SCOs during the 2014-2020 programming period. Their use has indeed proven to be an effective tool in reducing administrative burden for both Member States and beneficiaries. By allowing the reporting of standard unit costs, such as fixed rates for personnel expenses, SCOs streamline financial reporting, making fund management processes more efficient and less complex.

Despite their widely recognised benefits, SCOs were not universally adopted. This was due to challenges such as the relatively small size of allocations in certain countries, where their benefits would have been outweighed by the costs and administrative burden of data collection and analysis. In this regard, the absence of SCOs in some countries was recognised as a "missed opportunity" to reduce the complexity of fund management and there is room for encouraging their use.

Both national authorities and beneficiaries have benefited from the adoption of more flexible procurement approaches, such as centralised methodologies and dedicated procurement units, as well as from the introduction of digital procurement management systems. Despite these improvements, procurement often remains a significant challenge due to lengthy procedures, substantial documentation requirements, and rigid rules (particularly in areas such as security and emergency response), which continue to slow

project implementation in some Member States. In addition, public procurement rules are supplemented by national regulations tailored to the specific context of each MS, which in some cases increased the administrative efforts at the level of the national programmes.

Operating Support has proven effective in streamlining fund management by allowing authorities to focus on essential tasks, such as maintaining systems and ensuring operational stability without the complexity of project-based funding procedures. This support has reduced the administrative burden and simplified processes by funding ongoing operational activities, such as equipment maintenance, infrastructure upkeep, and technical updates, without the need for repetitive grant applications. The use of Operating Support has often resulted in a better streamlined fund management and might be better used to avoid bottlenecks in programme administration.

5.1.4 Coherence and complementarity

The ISF-BV is considered internally coherent. Different components serve to meet specific, differentiated needs. For example, the long-term structural needs at the national level are supported by nationally defined programmes for the entire funding period. While Specific Actions, Emergency Assistance and Union Actions allow for support to address emerging (and – in case of EMAS in particular - urgent) needs identified on an on-going basis through Annual Work Programmes which are identified at either (or both) the national and transnational level.

There are formal and informal mechanisms in place at the EU and national levels to ensure complementarities and, where relevant, synergies across the different components of the ISF-BV. These mechanisms include formal consultation of the multi-Annual Work Programmes at Union level. Meanwhile, it is a specific function of the Monitoring Committee and Responsible Authority at the national level to ensure a lack of overlap or duplication.

However, **Union Actions appear to be a weaker link in this respect**. At the same time, Union Actions serve a niche function and are managed either directly or indirectly by the Commission, meaning that without proactive efforts to disseminate and ensure the accessibility / transparency of what is supported, it is naturally harder to ensure synergies with national level funding during the implementation stage.

In terms of external **coherence, coordination mechanisms to ensure the coherence between the ISF-BV and other Union funds exist at the programming stage, inside the Commission and through the HOME Affairs Committee**. However, **this is less clear at the implementation stage**. The avoidance of overlaps is firstly ensured through coordination at the national level, although this is implemented differently across the participating countries (e.g. Monitoring Committees, shared Managing Authorities, additional reviews and assessment at programming stage). At the EU level, a robust inter-service consultation ensures that overlaps are avoided, together with additional tools, such as the participation of DG HOME in Monitoring Committee meetings, dialogue between DG HOME and Responsible Authorities, conducting on site visits, as well as the audits carried out at Union level. Although the interim evaluation noted that "mechanisms have been put in place to ensure continued coherence at the implementation stage", interviewees did not recall any specific formal coordination mechanism to ensure synergies and avoid duplication during the implementation of funded actions.

While different examples of mechanisms in place to ensure complementarity with national initiatives were identified in the study, the study could not confirm formal

mechanisms are in place across all Member States. Survey results only confirmed this for just over a third of Member States, and the national reports did not systematically mention formal mechanisms to support complementarity. Nonetheless the case studies did show that different relevant mechanisms exist in the Member States to ensure complementarity at the programming stage.

The stakeholders consulted considered that the ISF-BV is complementary to national-level policies and funding instruments. The ISF-BV was viewed as contributing to high-level policy priorities, such as accession to and membership in the Schengen Area.

The stakeholder consultations did not identify cases of duplication or overlap between the Instrument and national funding instruments.

The ISF-BV is coherent with the objectives and activities of the other Home Affairs Funds (AMIF and ISF-Police), as well as other EU funds. An area seen to be important was the coherence between ISF-BV and the Horizon 2020 programme. They study highlighted that beyond the ISF-BV, no other funding mechanism existed to further build on the pipeline of border management related innovation that was developed under the Horizon 2020 programme.

In this context, the ISF-BV funding was seen as a crucial tool to ensure the concepts developed under Horizon would lead to longer term testing and validation and eventually ensure these capabilities were available to procure on the EU market. However, interviews confirmed that Responsible Authorities are often unaware of the relevant R&D projects funded in their country, as well as the relevant stakeholders involved, and that generally follow up to Horizon 2020 was not prioritised by Member States under the ISF-BV as they tended to focus on using funding to address more immediate needs.

With regard to the ISF-BV funding in relation to third countries, no overlaps were identified with other forms of EU financial support. However, a few EU level stakeholders noted that the broad nature of the National Programmes (lack of detail on planned activities and in relation to which third countries at planning stage) made it difficult to determine whether and what exactly was being funded in relation to third countries under the ISF-BV. At the same time, it was noted that coordination with DG HOME had become much closer and more institutionalised since the migration crisis of 2015 which made the topic a political priority. Since then, both sides had been more involved in each other's planning, with more formalised and more institutionalised preparatory meetings and information-sharing meetings between DG NEAR, DG INTPA, EEAS and DG HOME. However, issues remain regarding: the alignment of the Union's external migration and security funding with the Union policies in these areas; the persistent challenge to use all existing (policy, funding, investment and other) tools, both at the disposal of the EU and its Member States, in a Team Europe spirit, to use strategically and timely leverage in relation to partner countries in order to improve cooperation on migration and security; the limitations for funding migration- and security-related actions in third countries

The ISF-BV is finally coherent with Frontex activities due to the involvement of Frontex at planning stage. The implementation of national capability planning is expected to further increase the alignment of DG Home funding and Frontex activities.

5.1.5 EU added-value

The implementation of the ISF-BV brought about significant added value and enhanced the capabilities of Member States in managing external borders and implementing the common visa policy.

The ISF-BV's support increased the overall resources available for border control and migration management. For instance, Cyprus enhanced its surveillance capabilities, Malta deployed Automated Border Control gates, and Slovakia acquired advanced border surveillance equipment. Additionally, the financial assistance provided by the Instrument enabled strategic projects focused on modernising and improving IT systems which may have not been developed, or fully developed, otherwise.

Without the support of the Instrument, several Member States reported that they would have struggled to implement essential Union policies effectively. In other Member States, essential actions to comply with Union policies would have still been carried out, but their overall reach, quality, and timeliness would have been reduced. Only Lichtenstein and Switzerland reported that they would have been able to carry out all necessary activities to comply with Schengen requirements without the support of the ISF-BV.

An interruption of the Instrument would pose challenges for 18 Member States plus Iceland and Norway, risking setbacks in critical operations.

Nonetheless, the survey results show that there is a limited perception of the direct benefit of funded actions at the Union level, primarily due to a lack of awareness among stakeholders.

5.1.6 Sustainability

Member States adopted a variety of mechanisms to promote the sustainability of ISF-BV project results at both the programming and implementation stages. These included requiring sustainability plans in funding applications, aligning projects with national priorities, and setting minimum operational periods for IT systems and infrastructure. While the level of uptake varied, several countries embedded sustainability into national strategies from the outset, helping ensure continued relevance and use of project outputs.

Structured monitoring and verification mechanisms were implemented by several Member States to track sustainability during and after implementation. These included post-completion evaluations, periodic inspections, reporting obligations, and maintenance requirements based on project type. However, these practices were not uniformly adopted across all Member States, and sustainability monitoring frameworks varied in depth and frequency.

Training and capacity-building activities were widely implemented and viewed by beneficiaries as key enablers of sustainability. In several cases, trained staff were able to independently manage infrastructure and IT systems. However, long-term impact was difficult to assess due to limited follow-up mechanisms, and practices for institutionalising knowledge transfer varied considerably across Member States.

Many ISF-BV-supported infrastructure and IT investments are expected to remain in use well beyond the funding period, particularly where national budgets or strategic frameworks ensured their integration into core operations. However, **reliance on EU**

funding remains a concern for high-maintenance assets, particularly in Member States with budgetary constraints.

5.1.7 Relevance

The evaluation confirmed that **the objectives and actions funded under ISF-BV were highly relevant to the identified needs of Member States**. The design of national programmes was informed by an assessment of national strategic documents defining long-term goals and by stakeholder consultations, ensuring that priorities reflect their needs. Policy dialogue between the Commission and the Member States allowed for addressing challenges encountered during the previous funding period.

ISF-BV demonstrated significant flexibility, allowing Member States to adapt their national programmes **in response to evolving needs and emerging challenges in border management**. This adaptability was crucial to maintaining the relevance of the programme throughout its implementation period (2014-2020), particularly in light of unforeseen events such as the COVID-19 pandemic and shifting migratory patterns.

Union Actions under ISF-BV were found to be relevant in addressing transnational needs that are of particular interest to the EU as a whole and funding through EMAS effectively addressed urgent needs arising from crises at the external borders, providing timely and tailored support to Member States facing disproportionate migratory pressures.

5.2 Lessons learned

In view of the unequal implementation of both objectives, and the finding that a substantial part of activities related to SO1 may have happened without the intervention of the fund, future instruments may need to consider possible incentives and clear guidance for activities in visa policy and, most particularly, the development of joint consular activities. In addition, encouraging more strategic alignment between national consular expansion efforts and EU funding priorities could improve the overall coherence and visibility of Union-level support.

In the case of the harmonisation and implementation of the acquis in the field of visa policy, awareness amongst stakeholders remained limited. More consistent integration of acquis-related objectives into training design and evaluation could increase its impact. Future efforts would benefit from encouraging Member States to link training more clearly to acquis implementation.

The evaluation of ISF-BV highlights the importance of flexibility and adaptability in funding border and visa management. The Instrument’s ability to remain effective despite unprecedented challenges illustrates the value of responsive design. Moreover, the experience of the ISF-BV underscores the importance of sustained investments in IT infrastructure and staff training as foundational elements of a harmonised and effective visa and border management system. Moreover, the assessment of the ISF-BV's relevance is positive, indicating that major changes to the Instrument’s design are not necessary. However, since stakeholders particularly value the programme's flexibility, particular attention should be paid to the continuation of this flexibility margin in terms of programming and funding, enabling a quick response to evolving needs and situations.

In general, in order to improve the monitoring of actions and the steering towards enhanced effectiveness, future instruments might benefit from improved monitoring and

performance assessment mechanisms. This would allow to better capture and monitor the progress towards the achievement of the established objectives.

In terms of efficiency, there is room for streamlining administrative processes for reducing the burden on national authorities and beneficiaries. Simplifying reporting requirements and administrative procedures, without diminishing the quality and the necessary quantitative information for the monitoring of the implementation, can significantly enhance efficiency. By reducing the administrative burden, Member States can allocate more time and resources to implementing effective interventions, achieve their planned outcomes and delivering results rather than navigating bureaucratic processes.

Also, in terms of efficiency, while the ISF-BV Instrument has demonstrated varying degree of cost-effectiveness and efficiency, ongoing challenges necessitate continued support for lower-performing Member States to enhance project management practices and ensure optimal implementation of Union-funded investments. The findings underscore the need for a nuanced understanding of how various factors can influence operational efficiency and the importance of adapting interventions to the specific contexts of each Member State.

In this regard, establishing a systematic data collection framework could reinforce efficiency assessment in the future. A robust data collection framework would also facilitate transparency and accountability, ensuring that resources are utilised effectively to meet the diverse needs of Member States.

There might be an added value as well in encouraging the exchange of good practice in terms of efficiency-oriented measures and public procurement.

In terms of internal coherence, ways of strengthening coordination and synergies between Union Actions and national programmes could be explored, in order to ensure the access to the results of the actions and synergies with national level funding at implementation stage.

There is also room to encourage the development of structured tools for assessing the complementarity between EU-funded interventions and national policies and priorities, notably beyond the programming stage. This complementarity should go beyond avoiding overlaps and should aim at reinforced joint action in the achievement of objectives.

As far as coherence with external spending programmes is concerned, and notably the NDICI, enhanced cooperation and coordination on programming both between the Commission services and with EU Member States are needed.

Also for the future, strenghtening the coherence between the ISF-BV and Horizon 2020 should be considered, to ensure that the concepts developed under Horizon 2020 lead to long term testing and validation and ensure capabilities are available to procure on the Union market.

Finally regarding the added value of the funding, given its lack of visibility for stakeholders and citizens, it is worth considering increased action in terms of communication.

ANNEX I: PROCEDURAL INFORMATION

This evaluation has been carried out by DG HOME, as responsible for the implementation of ISF-BV in the Commission. The evaluation was launched in May 2023.

The evaluation has been carried out in accordance with the rules of Better Regulation, by applying the methods and requirements established in the Toolbox. The evaluation was also based on the requirements set in the monitoring and evaluation framework for the 2014-2020 Home Affair Funds, as defined in the Commission Delegated Regulation 2017/207. In this regard, the five standard criteria for evaluation defined Better Regulation (Effectiveness, Efficiency, Relevance, Coherence and EU Added Value) were complemented by two additional ones: Sustainability and simplification and reduction of administrative burden

The evaluation has been steered by an Interservice Group, with the participation of the operational and policy units in DG HOME, as well as the following DGs and services: SG, DG BUDG, DG INTPA, DG JUST, DG REGIO, DG RTD, DG DEFIS, JRC, SJ, DG ECHO, DG TAXUD, DG EMPL, DG MARE, and OLAF.

The first meeting of the Interservice Group was held on 30 June 2023. During the meeting were discussed the Specifications for the preparatory study to be carried out with the assistance of external consultants. Additional meetings of the Interservice group took place to discuss the deliverables of the preparatory study on 11 March 2024, 13 May 2024, 23 July 2024, 25 October 2024… and 15 July 2025.

The preparatory study was confided to a consortium made up of EY France, Fondazione Brodolini and Tetra Tech, following an open call for tender launched on 3 October 2023. The contract was signed on 27 February 2024. The final report of the preparatory study was submitted to the Commission on 25 June 2025.

The evaluation is mostly based on the work done during the preparatory study, as explained in Annex II and III, in line with the requests in the Specifications drafted by the Commission.

ANNEX II: METHODOLOGY AND ANALYTICAL MODELS USED

This chapter presents the methodology employed for the mid term evaluation of the ISF-BV 2014-2020 and the limitations encountered.

Methodology

The evaluation was supported by an external study that was divided into four phases: inception, interim, data collection and finalisation. The study applied a mixed-method evaluation approach, incorporating both quantitative and qualitative research techniques

The inception phase was used for preparing work to be done. This included preliminary desk research, scoping interviews, developing an intervention logic, and the refinement of the methodological approach to be used. The inception phase concluded with the production of an inception report which was discussed during a meeting of the Steering Group, revised by the contractors to incorporate the Commission's feedback, and later the final inception report was approved.

The interim phase focused on gathering data by completing the desk research, providing an in-depth analysis of the evaluation questions through case studies, synthesising and analysing the annual performance reports submitted in 2023 and 2024, a review of the Member State mid term evaluations, reviewing a sample of target setting methodologies, mapping the allocations by type of intervention and target group, and an open public consultation. This phase concluded with an interim report which was discussed with the Steering Group, revised and then accepted.

During the data collection phase, the focus was on collecting the remaining data necessary for the study. This included obtaining quantitative and qualitative data from SFC2021, reviewing EU and national documents, interviews with stakeholders, and conducting a targeted survey.

In the final phase, the ex post evaluations received from the Member States, as well as the Final Implementation Reports were factored in the analysis. The findings were synthesised and triangulated, to formulate replies to the evaluation questions and draw conclusions. Furthermore, the second EU level focus group was held to validate the evaluation findings and develop lessons learned. The contractors delivered a draft final report which was discussed in a meeting with the Steering Group.

The draft staff working document was then shared with the Steering Group for a written consultation.

Regarding the data collection methods, the **desk research** included the review of EU legislation, ISF-BV planning documents, funding documents, documents related to the implementation of the Instrument at national level, programming data, previous EU studies and evaluation reports, EU policy documents and other relevant documents.

Furthermore, data on financial allocations, financial progress and implementation progress was extracted from SFC2021. The data was reviewed by management mode, specific objective, Member State and field of intervention to develop the state of play.

Regarding the **consultation activities**, EU level interviews were conducted with the officials from DG HOME, DG NEAR, DG ENPL, Frontex, DG JUST, DG TAXUD, DG INTPA, the EEAS, IOM, UNHCR and ICMPD. The interviews included scoping interviews and semi-structured interviews to gather data for the analysis, including the country case studies and thematic case studies. Further interviews were conducted for the case studies including with national authorities and beneficiaries.

Two EU level focus groups were held during the study. The **first EU level focus group** was held in person on the 25 June 2024. The focus group consisted of Managing Authorities and project beneficiaries. The focus group consisted of presenting the intervention logic, mapping needs, and understanding the extent to which needs were met by the Instrument.

The **second focus group** was held on 15 October 2024 and consisted of Commission officials, Managing Authorities, Frontex, ICMPD, and an NGO. The objective of the focus group was to validate the evaluation findings and further develop the lessons learned.

The **third focus group** was held on 28 March 2025. It consisted of Commission Officials, Managing Authorities, Frontex, and ICMPD. The objective was to discuss and validate the findings of the evaluation.

In addition to the focus groups, three **targeted surveys** were launched to target various stakeholders (national authorities, beneficiaries and other stakeholders). The analysis of the survey results fed into the main analysis.

The study included eight **country case studies** (HR, CZ, EL, IT, NO, PL, RO and ES) to dive deeper into the implementation of the ISF-BV to identify challenges encountered, specific processes, and best practices. The study also included five **thematic case studies** on Union Actions, EMAS, the impact of the Russian war of aggression towards Ukraine, Specific Actions, and the contribution to horizontal priorities. The thematic case studies allowed for deep dives into certain aspects of the Instrument and specific topics by reviewing specific projects.

Based on the work described above, the final report for the ex-post evaluation was drafted and approved.

Limitations and mitigation measures

The study encountered several limitations that were mitigated to the greatest extent possible.

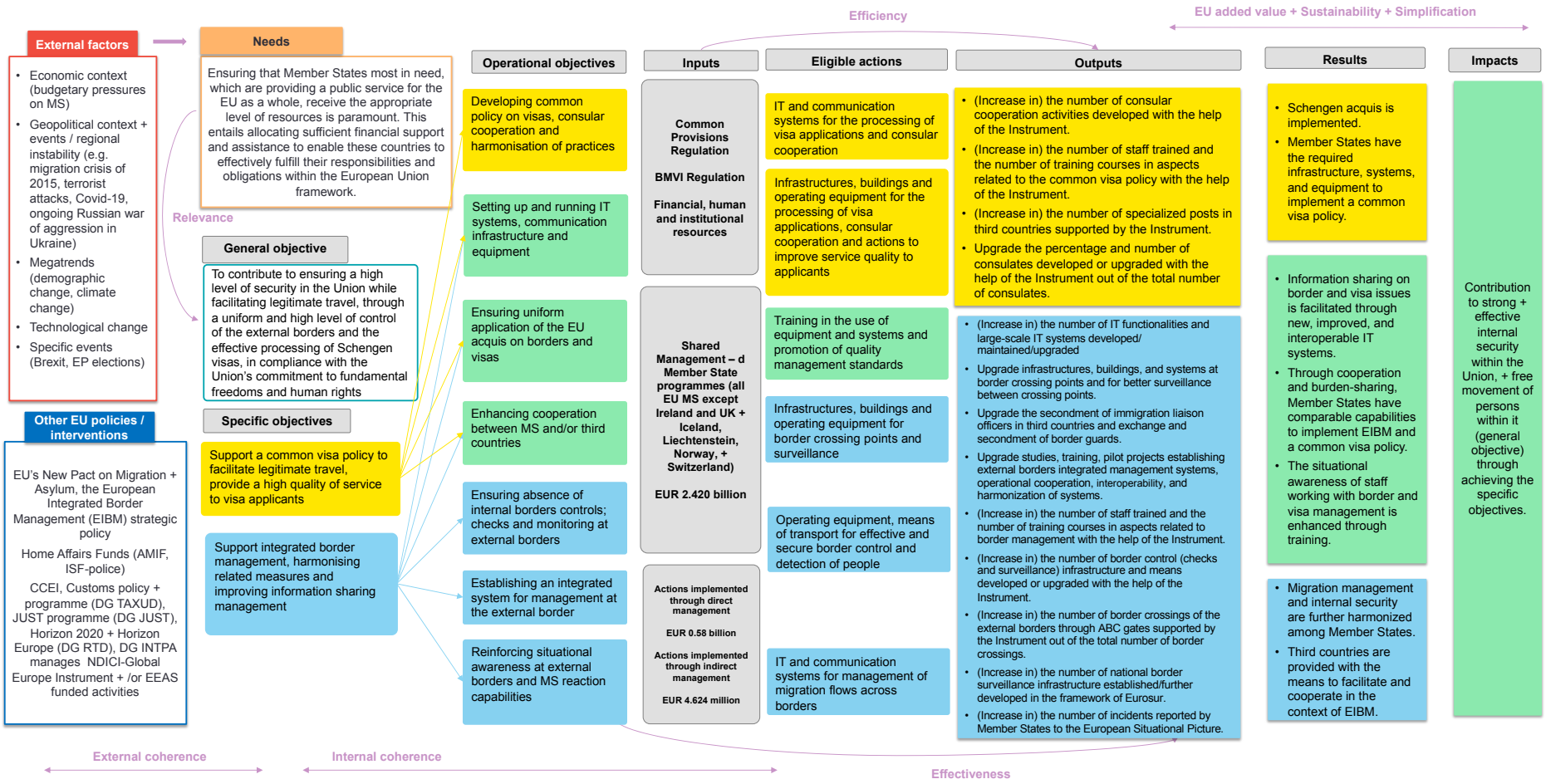
The first limitation was the inconsistent availability, quality and levels of granularity of data across the Member States. This made it difficult to conduct trend analysis and make comparisons across Member States. The study team mitigated this challenge by seeking further information when needed and employing protocols to ensure data reliability.

Secondly, some stakeholders had difficulty distinguishing between the 2014-2020 and 2021-2027 programming periods. The study made efforts to attribute the findings to the correct programming period.

Third, as the study was conducted at the same time as the AMIF and ISF evaluations, and participation in the targeted survey was voluntary, survey fatigue may have set in and caused a lower response rate.

Finally, the output and result indicators data transmitted by the Member States via SFC2021 included a number of omissions, clerical errors, and revealed differences in how Member States interpret, measure and report data. The data was reviewed for consistency and plausibility, and corrected where possible. Furthermore, not all Member States set milestones and targets. Of those that did, there were varying levels of ability to set realistic milestones and targets.

ISF-BV Intervention Logic



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ANNEX III: EVALUATION MATRIX

The evaluation grids are structured according to eight evaluation criteria as presented in the following table.

Evaluation criterion	Acronym
Effectiveness	EFF
Efficiency	EFF
Coherence	CO
EU Added Value	EUAV
Relevance	REL
Complementarity	COMP
Sustainability	SUS
Simplification	SIMPL

Theme	Effectiveness

EQ1. How did the Fund contribute to the achievement of the following specific objectives (SO 1)? Support a common visa policy to facilitate legitimate travel Provide a high quality of service to visa applicants Ensure equal treatment of third-country nationals Tackle illegal immigration?	Sub-EQ1.1. What progress was made towards promoting the development and implementation of the common visa policy to facilitate legitimate travel, and how did the Fund contribute to achieving this progress?	Action financed under ISF-BV have developed and facilitated legitimate travel through the common visa policy	Quantitative: common indicators listed in Annex IV of Regulation (EU) 515/2014 and common result and impact indicators listed in Annex IV of Regulation (EU) 2017/207R: Total airport transit visas and uniform/short-stay visas issued (including multiple ATVs, MEVs and LTVs) (regression analysis) Not issued rate for airport transit visas and uniform/short-stay visas (regression analysis) Evidence of sharing best practices among MS Perception of key stakeholders	DG HOME statistics SFC2014 (financial and physical implementation) Eurostat EU and MS programming and implementation documents (ex post evaluation reports, annual implementation reports of national programmes) Interviews with DG HOME stakeholders and other EU stakeholders Country case studies Focus groups Surveys Quantitative analysis
	Sub-EQ1.2. What progress was made towards ensuring better consular coverage and harmonized practices on visa issuance between MS, and how did the Fund contribute to achieving this progress?	Actions supported by the funds contributed to better consular coverage on visa issuance between MS and promoted general harmonization among MS	Common indicators SO1 R2: number of consular cooperation activities developed with the help of the Instrument SO1 I1: number of visa applicants having to apply for a Schengen visa outside of their country of residence SO1 I2; number of visa required countries in the world where the number of MS present has increased Examples of information sharing between MS Perception of stakeholders in enhanced harmonization on visa issuance between MS	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders including staff managing Fund, EU agencies involved at the operational level (e.g. Europol, Frontex, eu-LISA, EUAA), and relevant experts Country case studies Focus groups Surveys Quantitative analysis

	Sub-EQ1.3. What progress was made towards ensuring the application of the Union's acquis on visas and how did the Fund contribute to achieving this progress?	Actions financed under ISF-BV have promoted a uniform application of Union's acquis on Visa System policy in terms of skills acquired and general improvement	Common indicator SO1 R3: Number of staff trained and number of training courses in aspects related to the common visa policy with the help of the Instrument. Number of Schengen Evaluations recommendations in the area of visa addressed with the support of the Fund, as compared to the total number of recommendations issued (regression analysis) Perception of stakeholders	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders including staff managing Fund, EU agencies involved at the operational level (e.g. Europol, Frontex, eu-LISA, EUAA), and relevant experts Country case studies Focus groups Surveys Quantitative analysis
	Sub-EQ1.4. What progress was made towards MS' contribution to strengthening the cooperation between MS operating in third countries as regards the flows of third-country nationals into the territory of MS, including prevention and tackling of illegal immigration, as well as the cooperation with third countries, and how did the Fund contribute to achieving this progress?	Actions financed under ISF-BV have strengthened cooperation between MS operating in third countries as regards management of migrants flows as well as illegal immigration	Common indicators : Number of specialized posts in 3rd countries supported by the Fund; SO1 R1: Number of Schengen Evaluation missions in the area of visa carried out with support of the Internal Security Fund ("Fund") SO1 R5: Number of Schengen Evaluations recommendations in the area of visas addressed with the support of the Fund, as compared to the total number of recommendations issued (a/b) SO1 R6: Number of persons using fraudulent travel documents detected at consulates supported by the Fund Purchase of equipment at border crossing points; Examples of responses (capacity building, awareness raising,	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders including staff managing Fund, EU agencies involved at the operational level (e.g. Europol, Frontex, eu-LISA, EUAA), and relevant experts Country case studies Focus groups Surveys Quantitative analysis

			knowledge exchange) in 3rd countries to prevent illegal migration Perception of stakeholders on enhanced cooperation	
	Sub-EQ1.5. What progress was made towards supporting the common visa policy by setting up and running IT systems, their communication infrastructure and equipment, and how did the Fund contribute to achieving this progress?	The fund supported MS in the setting-up of IT System and Communication Systems that effectively supported the visa system	Total spending on IT systems and equipment purchased by MS through the fund Trained staff on IT systems and equipment Number of IT systems that are developed, upgraded and maintained with the fund's support	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders including staff managing Fund, EU agencies involved at the operational level (e.g. Europol, Frontex, eu-LISA, EUAA), and relevant experts Country case studies Focus groups Surveys Quantitative analysis
	Sub-EQ1.6. How did the operating support provided for in Article 10 of the Regulation (EU) No 515/2014 contribute to the achievement of the specific objective on border management?	Authorities enabled to ensure the free movement of persons across internal borders with the support of the Fund Authorities enabled to efficiently monitor of persons crossing the EU's external borders wit the support of the Fund With the fund support, IT systems, communication infrastructure and equipment are set up and running effectively (VIS, SIS).	Value and number of projects financed under the operating fund Increase in the # of IT systems that are developed, upgraded and maintained for border management and visa control. Adequacy of operations financed under the OP Perception of stakeholders	Document review (national evaluation reports, national programmes, national budgets, policy documents, etc) Quantitative analysis EU interviews

EQ2. How did the Fund contribute to the achievement of the following specific objectives (SO 2): Support integrated border management, including promoting further harmonisation of border management-related measures in accordance with common Union standards and through the sharing of information between MS and between MS and the European Agency for the Management of Operational Cooperation at the External Borders of the MS of the EU; Ensure, on one hand, a uniform and high level of control and protection of the external borders, including by the tackling of illegal immigration and, on the other hand, the smooth crossing of the external borders in conformity with the Schengen acquis, while guaranteeing access to international protection for those needing it, in accordance with the obligations contracted by the MS in the field of human rights, including the principle of non- refoulement?	EQ2.1 What progress was made towards promoting the development, implementation and enforcement of policies with a view to ensure the absence of any controls on persons when crossing the internal borders, and how did the Fund contribute to achieving this progress?	The fund supported the development of policies reducing controls for people crossing internal borders	Number of border control (checks and surveillance) infrastructure and means developed or upgraded with the help of the Fund Examples of reduced internal controls with the aid of ISF-BV funding Perception of stakeholders on effectiveness of measures and enhanced cooperation	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders including staff managing Fund, EU agencies involved at the operational level (e.g. Europol, Frontex, eu-LISA, EUAA), and relevant experts Country case studies Focus groups Surveys
	EQ2.2 What progress was made towards carrying out checks on persons and monitoring efficiently the crossing of external borders, and how did the Fund contribute to achieving this progress?	Through the Fund the checks on persons and the monitoring of external borders have been improved	SO2 C2: Number of border control (checks and surveillance) infrastructure and means developed or upgraded with the help of the Fund SO2 R2: Number of border crossings of the external borders through ABC gates supported by the Instrument out of the total number of border crossings SO2 I3: Number of irregular border crossings detected at EU external borders SO2 I5: Number of persons using fraudulent travel documents detected at the border crossing points Increase in the staff trained and training courses on border management in MS;	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders including staff managing Fund, EU agencies involved at the operational level (e.g. Europol, Frontex, eu-LISA, EUAA), and relevant experts Country case studies Focus groups Surveys Quantitative analysis

			Examples of improved border security measures and equipment implemented. Total number of border crossings points	
	EQ2.3 What progress was made towards establishing gradually an integrated management system for external borders, based on solidarity and responsibility, and how did the Fund contribute to achieving this progress?	Information sharing on border management and visa is facilitated through improved technology. (equipment and use of IT), trained staff and exchange of best practices between MS.	SO2 R5: Number of equipment items used during Frontex Coordinated Operations which were purchased with support of the Funds as compared to the total number of equipment items used for Frontex Coordinated Operations (a/b). number of irregular border crossings detected at the EU external borders (b) at the border crossing points number of persons using fraudulent travel documents detected at the border crossing points Evidence of Establishing new or reinforcing existing integrated systems for border control (infrastructure, and operating equipment) Evidence of strengthened cooperation between MS to ensure a high level of control and protection of external borders	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders Country case studies Focus groups Surveys Quantitative analysis
	EQ2.4 What progress was made towards ensuring the application of the Union's acquis on border management, and how did the Fund contribute to achieving this progress?	Through the Fund, MS have been supported in the application of Union's acquis on border management.	SO2 R1: Number of staff trained and number of training courses in aspects related to border management with the help of the Instrument SO2 R3: Number of Schengen Evaluation missions in the area	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc)

			of borders carried out with the support of the Fund SO2 R4: Number of Schengen Evaluation recommendations in the area of borders addressed with the support of the Fund, as compared to the total number of recommendations issued (a/b) Perception of stakeholders	Interviews with DG HOME stakeholders and other EU stakeholders Country case studies Focus groups Surveys Quantitative analysis
	EQ2.5 What progress was made towards contributing to reinforcing situational awareness at the external borders and the reaction capabilities of MS, and how did the Fund contribute to achieving this progress?	Member states have reinforced their reaction capabilities and are their awareness at external borders.	SO2 I1: Number of national border surveillance infrastructure established/further developed in the framework of Eurosur Number of incidents reported by the Member State to the European Situational Picture: Illegal immigration, including on incidents relating to a risk to the lives of migrants Number of incidents reported by the Member State to the European Situational Picture: Crisis situations Number of incidents reported by the Member State to the European Situational Picture: Cross-border crime SO2 I4: Number of searches in Schengen Information System (SIS II).	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders Country case studies Focus groups Surveys Quantitative analysis
	EQ2.6 What progress was made towards setting up and running IT systems, their communication infrastructure and equipment that support border checks and border surveillance at the external	The Fund has contributed to the innovation or upgrade of communication infrastructure and equipment that support border checks and border surveillance at the external borders	Evidence of setting up IT systems for border crossing surveillance and management of migration flows. Number of cooperation activities between MS supporting the information	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc)

	borders, and how did the Fund contribute to achieving this progress?		exchange and cooperation with third countries in the neighbourhood region Perception of stakeholders	Interviews with DG HOME stakeholders and other EU stakeholders Country case studies Focus groups Quantitative analysis Quantitative analysis
	EQ2.7 What progress was made towards supporting services to MS in duly substantiated emergency situations requiring urgent action at the external borders, and how did the Emergency Assistance contribute to achieving this progress? What type of emergency actions was implemented? How did the emergency actions implemented under the Fund contribute to addressing the urgent needs of the Member State? What were the main results of the emergency actions?	Through the fund, MS have duly substantiated emergency situations requiring urgent action at the external borders.	Evidence of timely and effective Emergency Assistance Fund's role in addressing urgent needs and crises. Evidence of successful results in crisis management. Perception of stakeholders	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders including staff managing Fund, EU agencies involved at the operational level (e.g. Europol, Frontex, eu-LISA, EUAA), and relevant experts Country case studies Focus groups Surveys
	EQ2.8 How did the operating support provided for in Article 10 of the Regulation (EU) No 515/2014 contribute to the achievement of the specific objective on border management?	Operating Support has been used coherently with objectives set out by the Regulation Operating Support schemes have supported Member States	Adequacy of projects financed under the OP Perception of stakeholders	EU and MS desk research, including review of programme documents (performance documents, financial data, SFC2014-2020 data, etc) Interviews with DG HOME stakeholders and other EU stakeholders Country case studies Focus groups Surveys

Efficiency

Theme	Efficiency			
Question	Sub-questions	Judgment criteria	Indicators	Sources
EQ3. Were the general objectives of the Fund achieved at reasonable cost?	To what extent were the expected results of the Fund achieved at reasonable cost in terms of deployed financial and human resources?	Appropriate arrangements were used to select cost-effective operations	Stakeholder perception on the adequacy of the mechanism used to select the different operations (e.g., IT and communication systems; infrastructure building and operating systems; trainings);	Online survey

		The fund supported types of interventions that are known to be cost-effective, based on available evidence, including relevant literature or the ex-post evaluation of the previous Fund	Financial allocation per MS and per types of actions Human resource allocated per MS and per types of actions Absorption rate per MS and overall Result and Output indicators as per Core performance Indicators (2014-2020). Cross-country analysis (National Programmes): data envelopment analysis (cost-effectiveness of each Programme will be measured by comparing financial resources used and an index composed by a set of result/output indicators. The distance of each MS from the efficiency frontier will allow a cross-country comparison. Consultation of stakeholders will be used to identify the causes of inefficiencies.) Stakeholder perception on the level of cost-effectiveness of Union Actions Stakeholder perception of the Level of cost-effectiveness of Emergency Assistance	Annual implementation reports SFC2014 Thematic Case studies Literature and desk review
		The administrative burden is proportionate for all implementing actors (Responsible Authorities and other delegated authorities), compared to the previous programming period similar services offered to comparable target groups without the support of the Fund The administrative burden is proportionate for all beneficiaries, compared to the previous programming period/ similar services offered to comparable target groups without the support of the Fund The administrative burden is proportionate for all end-users, e.g., compared to the previous programming period/ similar	Perception of stakeholders regarding the adequacy of the administrative burdens	Online survey Country Case studies

		services offered to comparable target groups without the support of the Fund Absence of 'gold-plating' at the national level (e.g., from Responsible Authorities, Intermediate Bodies, national Audit Authorities), i.e. requirements are not interpreted more Absence of 'gold-plating' at the EU level, i.e., requirements are not interpreted more restrictively then in the legal basis and unless a justified reason exists		
	What measures were put in place to prevent, detect, report and follow up on cases of fraud and other irregularities, and how did they perform?	The management and control system of the MS, described as per the legal basis, ensures quality of the of the implementation of National Programmes and the prevention, detection and correction of irregularities, including fraud, and the recovery of amounts unduly paid, together with any interest on late payments	Number of mechanisms in place at MS level to report, detect and prevent fraud and irregularities (where possible, analysed by country)	Online survey Annual implementation reports
	What measures were put in place to prevent, detect, report and follow up on cases of fraud and other irregularities, and how did they perform?	The management and control system of the MS, described as per the legal basis, ensures quality of the of the implementation of National Programmes and the prevention, detection and correction of irregularities, including fraud, and the recovery of amounts unduly paid, together with any interest on late payments	Number of mechanisms in place at MS level to report, detect and prevent fraud and irregularities (where possible, analysed by country)	Online survey Annual implementation reports

Relevance

Theme	Relevance			
Evaluation Question	Sub-questions	Judgment criteria	Indicators	Sources

EQ. 7 Did the objectives of the interventions funded by the Fund correspond to the actual needs?	Sub-EQ 7.1 Did the objectives set by the Member State in the National Programme respond to the identified needs?	The objectives set by the Member States in their National Programme responded to their identified needs At the time when the National Programmes were drafted In the course of the implementation of the National Programmes (evolving needs)	Documentary evidence and/or stakeholders feedback that the identification of key needs, priorities and objectives was built in the design of the national programmes (e.g., evidence of policy dialogue between the Commission and the Member States at the beginning of the programming stage) National authorities feedback on the extent to which they consider that the objectives and activities of the Fund addressed the needs of the EU, Member States, and citizens Documentary evidence and/or stakeholders feedback that the flexibility offered by the Fund (i.e., transfers of money between different objectives) helped to address changing needs and emerging challenges (e.g. COVID-19 or country specific crisis) Sum allocated to the Member States national programme, per Member States and assessment of whether Member States' with the greatest needs received the most funding	Desk research including programme documentation and the ISF-BV interim evaluation as well as the evaluation of the External Borders fund (2007-2013) Mapping of the scope of investments and target groups Focus Group 1 discussions Surveys of relevant national authorities within Member States Survey of other relevant national authorities, competence centers, experts at EU and national level Survey of beneficiaries Public Consultation Country and thematic case studies including related desk research and interviews
	Sub-EQ 7.2 Did the objectives set in the Annual Work Programme (Union Actions) address the actual needs?	The objectives set in the Annual Work Programme (Union Actions) responded to the identified need for transnational initiatives that benefit the EU as a whole	EU and national authorities feedback on the extent to which they consider that the objectives set in the Union Action Work Programme addressed the needs of the EU, Member States, and citizens Evidence and stakeholders' feedback on whether the Union Actions provided the Fund with sufficient flexibility to respond to	Thematic case study on Union Actions Mapping of the scope of investments and target groups Focus Group 1 discusions Surveys of relevant national authorities within Member States Survey of other relevant national authorities, competence

			emerging/changing needs on a transnational level Sum allocated to the Union Actions to respond to emerging needs (as a % of the total ISF-BV fund)	centers, experts at EU and national level Survey of beneficiaries under National Programmes Public Consultation Interviews with EU stakeholders and national stakeholders Country case studies (interviews with national authorities)
	Sub-EQ 7.3 Did the objectives set in the Annual Work Programme (Emergency Assistance) address the actual needs?	The objectives set in the Annual Work Programme (Emergency Assistance) responded to the identified needs to address immediate and specific emergency situations requiring urgent action	EU, national authorities and International Organisations' feedback on the extent to which they consider that the objectives set in the Emergency Assistance Work Programme addressed the needs of the EU, Member States, and citizens Documentary evidence highlighting the flexibility of the Fund (e.g., examples that budget allocations were changed in the course of the implementation to better respond to needs) Stakeholders' feedback on whether Emergency Assistance provided the Fund with sufficient flexibility to respond to emerging/changing needs Sum allocated to the EMAS to respond to emerging needs (as a % of the total ISF-BV fund)	Thematic case study on EMAS Desk research including programme documentation; EU policies and strategy documents; and the ISF-BV interim evaluation as well as the evaluation of the External Borders fund (2007-2013) Mapping of the scope of investments and target groups Focus Group 1 Surveys of relevant national authorities within Member States Survey of other relevant national authorities, competence centers, experts at EU and national level Survey of beneficiaries under National Programmes Public Consultation
	Sub-EQ 7.4 Which measures did the Member State put in place to address changing needs?	Needs assessment were conducted on a continuous basis to ensure the continued relevance of the ISF-BV programme for its stakeholders (needs were identified) Appropriate mechanisms and processes (including the	Documentary evidence that Member States (in the case studies selected) conducted continuous needs assessments on a regular basis or whenever there were relevant contextual changes at the national level (considering the National Programmes implementation) and at	Desk research including programme documentation; EU policies and strategy documents; and the ISF-BV interim evaluation as well as the evaluation of the External Borders fund (2007-2013) Mapping of the scope of investments and target groups

	partnership / monitoring committee) were put in place to address changing needs both at the programming and implementation phases, in a timely manner	transnational level (for Union Actions) Number of National Authorities who conducted needs assessment Documentary evidence and/or stakeholders opinion that the funds objectives rely on diagnosis/ studies/assessment of border management and visa policy needs in the EU and make direct reference to them (needs are identified) Evidence of mechanisms and/or consultative process, such as the partnership / monitoring committee, to engage with stakeholders and ensure the continued relevance of Fund to address changing needs by providing timely input on evolving needs and relevant developments on the ground (e.g., changes in migratory pressures, threats of cross-border crime, and the need to maintain a balance between security concerns and facilitating legitimate travel).	Focus Group 1 Surveys of relevant national authorities within Member States Survey of other relevant national authorities, competence centers, experts at EU and national level Survey of beneficiaries under National Programmes Public Consultation Interviews with EU stakeholders Country case studies (interviews with national authorities, including the Monitoring Committees) Answers to coherence and complemetarity EQs regarding cooperation mechanisms and processes in place.

Coherence

The evaluation of coherence looks at a how well different actions with similar objectives work together. Complementarity is similar to coherence and can be considered a sub-set of coherence (as stated in the Better Guidelines Toolbox, Tool #47). While coherence is broader, complementarity focuses more specifically on the extent to which EU policies and interventions support and usefully supplement other policies (particularly those pursued by the Member States). To avoid overlap between the evaluation questions dealing with coherence and complementarity, and in line with the evaluation questions in the ToR, we distinguished between coherence and complementarity as follow:

coherencewill assess the internal coherence of the ISF-BV Fund management modes as well as the Fund's external coherence with other programmes funded by the EU which have similar objectives.

complementarity (see next criterion) will assess the external coherence/complementarity of the Fund with other funds, initiatives and policies pursued by the Member States and which have similar objectives.

The coherence criteria will assess whether the ISF-BV objectives (notably those of the National Programmes) were aligned with:
The policy goals and priorities of the EU in the fields of visa policy and border management as well as humanitarian policy and EU's external actions
The objectives of other thematically relevant DG HOME funding instruments and initiatives (e.g., AMIF and ISF police)
The objectives of other relevant EU funds which (potentially) overlap/complement ISF-BV such as such as DG TAXUD (Customs 2020), DG JUST (Justice Programme), and DG RTD (Horizon 2020 and Horizon Europe) and /or EEAS funded activities.
The assessment will consider whether there were synergies or duplications/overlap at the programming phase as well as during the implementation period of the Fund (i.e., continued coherence) including whether appropriate mechanisms were put in place to monitor and address any potential duplications/overlap and ensure greater synergies where possible and relevant.

As per the Better Regulation Toolbox 47, the assessment of the complementarity criteria will rely mostly on qualitative findings. It will look for evidence of synergies or inconsistency between ISF-BV and other initiatives and policies in the fields of visa policy and border management at the EU level which have the same or similar objectives and are expected to work together or inform one another.

The approach will rely on desk research (e.g., review of a relevant sample of project documentation and broader overarching EU strategies and policy documents) together with targeted consultation of EU stakeholders (interviews and thematic case studies) and national authorities (country case studies and surveys).

Theme	Coherence			
Evaluation Question	Sub-questions	Judgment criteria	Indicators	Sources
EQ4. Were the objectives set in the Fund coherent with the ones set in other programmes funded by EU resources and applying to similar areas of work? Note to DG HOME: We propose to remove the reference to "National Programme" in order to also look at other aspect of the Fund and incorporate the element on internal coherence.	Sub EQ 4.1 Has the structures of the Fund ensured greater complementarities and, where relevant, synergies across the different management modes? (This is an additional sub-question not originally foreseen in the ToR. It will enable the study to look more in depth into internal coherence. In addition, a similar question is included for the evaluation of BMVI which will allow the study to draw comparisons)	The structure and management mode of the Fund (into Direct, indirect and shared management as well as into national programmes, EMAS and Union Actions) and its internal organisational arrangements or coordination mechanisms ensured complementarities and, where relevant, synergies.	Documentary evidence and/or stakeholders perception of complementarity or overlap between the Fund's different implementation mechanisms (shared, direct and indirect) Document evidence and/or stakeholders perception of complementarity or overlap between the Fund's implemetation mechanisms (national programmes, EMAS and Union Actions) Documentary evidence and/or stakeholders perception of internal mechanisms/structure to ensure synergies and prevent overlaps	EU level desk research including review of programme documents (e.g., regulation, Work Programme, existing coordination mechanisms, etc.) and the ISF-BV mid-term evaluation Interviews with EU (DG HOME) and national stakeholders Thematic case studies on the different management modes

	Sub EQ 4.2 Was an assessment of other interventions with similar objectives carried out and taken into account during the programming stage?	DG HOME carried out assessments of other EU interventions with similar objectives during the programming phase to avoid duplication/overlap and build on synergies	Documentary evidence of a mapping/assessment of other interventions conducted to maximise synergies and avoid duplications. Documentary evidence and/or stakeholders feedback that stakeholders from other EU interventions were consulted EU stakeholders' opinions on whether the assessment of other interventions with similar objectives (if any was carried out) was sufficient, and sufficiently taken into account during the programming stage of ISF-BV	EU level desk research including review of the ISF-BV mid-term evaluation, and a review of programme documents to fill the gaps if any (e.g., study, mapping or assessment of other EU interventions conducted by DG HOME during the programming stage) Interviews with DG HOME stakeholders and other EU stakeholders including Commission staff managing other funds, the Committee for the Home Affairs Funds, and EU Agencies in the field of Justice and Home Affairs Thematic case studies (interviews with EU stakeholders in particular)
EQ5. Was the coherence ensured also during the implementation of the Fund?	Sub EQ 5.1 Were coordination mechanisms between the Fund and other interventions with similar objectives established?	Coordination mechanisms and arrangements were used regularly and to good effect, by DG HOME to ensure: Continued alignment with EU policies and strategies in the realm of border management and visa policy as well as humanitarian policy and EU's external actions (e.g., Pact on Migration and Asylum, Internal Security Strategy and Action Plan, EBCG Regulations) Coordination, complementarities and, where relevant, synergies across other EU funds, in particular DG HOME AMIF and ISF funds,	Documentary evidence and/or stakeholders feedback on the existence of structural/ coordination mechanisms to ensure ongoing alignment with other EU funds/policies and adapt to changes and evolving needs accordingly (e.g., evidence of information exchange on the Fund's actions and projects between the responsible authorities and other institutional actors responsible for other funds at different levels and with Frontex; institutional arrangements, specific directorates, divisions, units,	EU level desk research including review of the ISF-BV mid-term evaluation, and a review of programme documents to fill the gaps if any (e.g., documents on coordination mechanisms with other Funds) Interviews with DG HOME stakeholders and other EU stakeholders including Commission staff managing other funds, the Committee for the Home Affairs Funds, and EU

		cohesion policy, Customs 2020, EEAS actions, DG Justice Programme and ESIF.	platforms, and committees set up to boost the coordination and synergies with other EU funds; etc.) Stakeholders perception that the mechanisms and bodies in place are adequate to generate synergies and avoid duplication of effort	Agencies in the field of Justice and Home Affairs Thematic case studies (interviews with EU stakeholders in particular)
	Sub EQ 5.2 Were the objectives and types of activities of the Fund coherent with and non-contradictory to other interventions with similar objectives? Note to DG HOME: As per BRG, coherence should look at the objectives and not the actions, we therefore propose to rephase accordingly	The objectives and types of activities funded through the ISF-BV align with: EU (cross-cutting) policies and priorities (e.g. on migration, EIBM and visa as well as humanitarian policy and EU's external actions) other EU actions/activities in the area of migration and border management including other Home Affairs Funds (e.g., AMIF and ISF Police) other relevant EU funds including Horizon, Customs 2020, EEAS actions, Justice Programme and ESIF	Documentary evidence of alignment between ISF-BV objectives and type of activities with EU policies documentary evidence and stakeholders perception of synergies (cooperation and collaboration) and/or duplication between ISF-BV and other EU interventions with similar objectives (see judgement criteria). Number of stakeholders that positively assessed the coherence of the Fund with other EU policies and interventions with similar objectives.	EU level desk research including review of the ISF-BV mid-term evaluation, of programme documents (ISF-BV and other relevant EU interventions, including their midterm and expost evaluations) and relevant EU policy and strategy documents on border management and visa policy Interviews with DG HOME stakeholders and other EU stakeholders including Commission staff managing other funds, the Committee for the Home Affairs Funds, and EU Agencies in the field of Justice and Home Affairs Thematic case studies (interviews with EU stakeholders in particular)

	EQ6.2 Would have the Member States carried out the actions required to implement the EU policies in the Fund areas without the financial support of the Fund?	The financial support of the Fund proved to be pivotal towards the implementation of relevant actions by the Member States	Number and type of new equipment and tools acquired Extent to which existing equipment have been enhanced Stakeholders' perception (beneficiaries) on advantages / benefits in terms of their capacity and competence to prepare, implement and manage projects	Documentary review: National programmes National Evaluation Reports UA AWP EMAS Selected EU-funded programmes Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level
	EQ6.3 What would be the most likely consequences of an interruption of the support provided by the Fund?	The actions implemented through the Fund's support contributed towards scope effects, scale effects, function/role/process effects, and the overall impact on Union-level objectives that would not have been achieved by Member States acting alone The discontinuity of the Fund's financial support would reflect in most ongoing actions being interrupted and new actions not being confirmed	Amount of national resources dedicated to borders and visas Number and type pf innovative solutions adopted throughout the ISF-BV Level of improvement of existing innovative solutions	Documentary review: National programmes National Evaluation Reports UA AWP EMAS Selected EU-funded programmes Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level

	EQ6.4 To what extent have actions supported by the Fund resulted in a benefit at the Union level?	The results at the EU level would not have been achieved at all, would have been achieved to a smaller extent, or would have taken more time to materialise without EU funding The role of EU-level stakeholders would have been more limited without Fund's backing	Amount of national resources dedicated to borders and visas Stakeholders' judgment (at EU-level) on whether their role would have been more limited without the ISF-BV	Documentary review: National programmes National Evaluation Reports UA AWP EMAS Selected EU-funded programmes Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level
	EQ6.5 What was the added value of operating support?	Equipment and systems acquired and activated through Operating support allowed for a smooth implementation of the actions	Number and type of new equipment and tools acquired Extent to which existing equipment have been enhanced Stakeholders' perception (beneficiaries) on advantages / benefits in terms of their capacity and competence to prepare, implement and manage projects (in the framework of Operating Support)	Documentary review: National programmes National Evaluation Reports UA AWP EMAS Selected EU-funded programmes Operating Support specific project docs Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level

Complementarity

Theme	Complementarity			
Evaluation Question	Sub-questions	Judgment criteria	Indicators	Sources
EQ. 8 Were the objectives set in the national programme and the corresponding implemented actions complementary to those set in the framework of other policies, in particular those pursued by the Member State	Sub-EQ 8.1 Was an assessment of other interventions with complementary objectives carried out and taken into account during the programming stage?	Member States carried out assessments of other EU interventions with similar objectives during the programming phase stage to avoid duplication/overlap and build on synergies	Documentary evidence (in the case studies countries) and/or stakeholders feedback of an assessment of other interventions conducted by Member States to maximise synergies and avoid duplications Number of National Authorities that reported having conducted an assessment of otherinterventions Documentary evidence and/or stakeholders feedback of synergies (cooperation and collaboration) and/or duplication between ISF-BV and Member States funds/instruments at the design stage EU stakeholders' opinions on whether the assessment of other interventions with similar objectives (if any was carried out) was sufficient, and sufficiently taken into account during the programming stage of ISF-BV Number of Member States that positively assessed the coherence of the Fund with other EU and national funds at the programing stage	Desk research (e.g., identification of challenges related to the assessment conducted reported in the Annual/ Final implementation reports) Country case studies (interviews with national authorities and desk review of assessment of other EU interventions if any carried out) Survey with national authorities (coherence and complementarity with national funds) Survey of other relevant national authorities, competence centers, and experts at EU and national level Survey of beneficiaries under National Programmes Interviews with EU stakeholders

	Sub-EQ 8.2 Were coordination mechanisms between the Fund and other interventions with similar objectives established to ensure their complementarity for the implementing period?	Coordination mechanisms and arrangements were used regularly and to good effect to ensure coordination, complementarities and, where relevant, synergies between ISF-BV and Member States instruments/initiatives.	Number of Member States that have in place structural/ coordination mechanisms to ensure ongoing alignment with other EU funds/policies and adapt to changes and evolving needs accordingly (e.g., evidence of information exchange on the Fund's actions and projects between the responsible authorities and other institutional actors responsible for other funds at different levels and with Frontex; institutional arrangements, specific directorates, divisions, units, platforms, and committees set up to boost the coordination and synergies with other EU funds; etc.) Stakeholder opinion on the mechanisms and whether they are considered by the stakeholders to be effective in generating synergies and avoid duplication of effort.	Desk research (e.g., identification of coordination mechanisms and structure set up reported in the Annual/ Final implementation reports) Country case studies (interviews with national authorities, including the Monitoring Committees (249) and desk review of coordination processes if any) Survey with national authorities (coherence and complementarity with national funds) Survey of other relevant national authorities, competence centers, and experts at EU and national level Survey of beneficiaries under National Programmes Interviews with EU stakeholders

(249) Findings from the ISF-BV midterm evaluation: The MC includes, as members or as observers, representatives of institutions responsible for the use of other relevant funds. It holds regular meetings and continuously analyses the implementation status of ISF-BV projects

	Sub-EQ 8.3 Were mechanisms aimed to prevent overlapping of financial instruments put in place?	Coordination mechanisms and arrangements were used regularly and to good effect to avoid the overlap of financial instruments.	Number of Member States that have in place coordination mechanisms and bodies to prevent overlapping of financial instruments and ensure traceability and control of funding throughout the entire project lifetime; Documentary evidence and/or stakeholders feedback on the (regular) use and effectiveness of these coordination mechanisms (e.g., Documentary evidence and/or stakeholders feedback of synergies and overlap of financial instrument) Stakeholders opinion on whether the mechanisms and bodies in place are considered to be adequate in preventing the overlap of financial instruments.	Desk research (e.g., identification of of coordination mechanisms and structure set up reported in the Annual/ Final implementation reports) Country case studies (interviews with national authorities, including the Monitoring Committees) Survey with national authorities (coherence and complementarity with national funds) Survey of other relevant national authorities, competence centers, and experts at EU and national level Interviews with EU stakeholders
	Sub-EQ 8.4 Were the actions implemented through the Fund coherent with and non-contradictory to other interventions with similar objectives implemented by Member States? (Noted: We suggest to add this additional sub-question as the logical continuation of the previous sub-EQ (which look at whether coordination mechanism were established) to assess whether this	The objectives and funded activities of the ISF-BV implemented by Member States aligned with those they implemented through other national and EU programme	Documentary evidence of synergies (cooperation and collaboration) and/or duplication between ISF-BV and other interventions with similar objectives implemented by national authorities. Number of Member States that positively assessed the coherence of the ISF-BV Fund with other interventions with similar objectives implemented at the national level	Desk research (e.g., identification of challenges related to duplication/overlap reported in the Annual/ Final implementation reports) Country case studies (interviews with national authorities, including the Monitoring

	mechanisms ensured coherence)			Committees (250) and desk review of coordination processes if any) Survey with national authorities (coherence and complementarity with national funds) Survey of other relevant national authorities, competence centers, and experts at EU and national level Interviews with EU stakeholders

EU added value

Theme	EU added value			
Questions	Sub-questions	Judgment criteria	Indicators	Sources
EQ6. Was any value added brought about by the EU support?	EQ6.1 What are the main types of added value resulting from the Fund support (volume, scope, role, process)?	The Fund contributed towards scope effects, scale effects, and function/role/process effects that would have not been achieved in the absence of the EU support	Number of actions addressing a wider target groups / policy areas which were not considered in the programming phase Number and volume of actions per target group Perception of consulted stakeholders regarding the added value brought about by the Fund's support	Documentary review: Annual Implementation Reports National Evaluations UA AWP EMAS EASO reports National policies on visa, border management, illegal immigration Country case study interviews

(250) Findings from the ISF-BV midterm evaluation: The MC includes, as members or as observers, representatives of institutions responsible for the use of other relevant funds. It holds regular meetings and continuously analyses the implementation status of ISF-BV projects

				Thematic case study interviews Survey for end-beneficiaries Interviews at MS level
	EQ6.2 Would have the Member States carried out the actions required to implement the EU policies in the Fund areas without the financial support of the Fund?	The financial support of the Fund proved to be pivotal towards the implementation of relevant actions by the Member States	Number and type of new equipment and tools acquired Extent to which existing equipment have been enhanced Stakeholders' perception (beneficiaries) on advantages / benefits in terms of their capacity and competence to prepare, implement and manage projects	Documentary review: National programmes National Evaluation Reports UA AWP EMAS Selected EU-funded programmes Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level
	EQ6.3 What would be the most likely consequences of an interruption of the support provided by the Fund?	The actions implemented through the Fund's support contributed towards scope effects, scale effects, function/role/process effects, and the overall impact on Union-level objectives that would not have been achieved by Member States acting alone	Amount of national resources dedicated to borders and visas Number and type pf innovative solutions adopted throughout the ISF-BV Level of improvement of existing innovative solutions	Documentary review: National programmes National Evaluation Reports UA AWP EMAS Selected EU-funded programmes

		The discontinuity of the Fund's financial support would reflect in most ongoing actions being interrupted and new actions not being confirmed		Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level
	EQ6.4 To what extent have actions supported by the Fund resulted in a benefit at the Union level?	The results at the EU level would not have been achieved at all, would have been achieved to a smaller extent, or would have taken more time to materialise without EU funding The role of EU-level stakeholders would have been more limited without Fund's backing	Amount of national resources dedicated to borders and visas Stakeholders' judgment (at EU-level) on whether their role would have been more limited without the ISF-BV	Documentary review: National programmes National Evaluation Reports UA AWP EMAS Selected EU-funded programmes Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level
	EQ6.5 What was the added value of operating support?	Equipment and systems acquired and activated through Operating support allowed for a smooth implementation of the actions	Number and type of new equipment and tools acquired Extent to which existing equipment have been enhanced	Documentary review: National programmes National Evaluation Reports

		Stakeholders' perception (beneficiaries) on advantages / benefits in terms of their capacity and competence to prepare, implement and manage projects (in the framework of Operating Support)	UA AWP EMAS Selected EU-funded programmes Operating Support specific project docs Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level

Sustainability

Theme	Sustainability			
Question	Sub-questions	Judgment criteria	Indicators	Sources
EQ9. Are the positive effects of the projects supported by the Fund likely to last when the support from ISF will be over?	Sub-EQ9.1. What measures were adopted by the Member State to ensure the sustainability of the results of the projects implemented with Fund support, both at the programming and implementation stage?	Measures to ensure sustainability of results adopted by MS during the programming stage provided a sound basis for the actions Measures adopted by MS during the implementation stage have supported sustainability of results of the implemented actions National Programmes supported the transfer or upscale of innovative projects	Number of projects implemented through the Fund whose activities are set to continue without the EU funding Number of ISF-BV beneficiaries who have received financial resources by other EU Funds/ national Funds Stakeholders' judgment on whether the measures implemented were adequate to support the projects sustainability.	Documentary review: National Evaluation Reports National Programmes Annual Implementation Reports Interviews: National RA Relevant Beneficiaries of funding EMAS, UA, NP

				Relevant EU agencies and EC DGs Survey Case Studies
	Sub-EQ9.2. Were mechanisms put in place to ensure a sustainability check at the programming and implementation stage?	Mechanisms to ensure sustainability of results adopted by MS during the programming stage provided a sound basis for the actions Mechanisms adopted by MS during the implementation stage have supported sustainability of results of the implemented actions	Number of documents developed at EU Level and National level on sustainability Number of EU and national monitoring committee having sustainability as a topic in the agenda Stakeholders' judgment on the adequacy of mechanisms carried out	Documentary review: National Evaluation Reports National Programmes Annual Implementation Reports Interviews: National RA Relevant Beneficiaries of funding EMAS, UA, NP Relevant EU agencies and EC DGs Survey Case Studies
	Sub-EQ9.3. To what extent are the outcomes/benefits of the actions sustained by the Fund expected to continue thereafter?	Outcome and benefits of the projects funded through ISF BV are set to continue after the funding period	Number of networks created through the Fund and still in place after the closure of the action Number of partnerships created through the Fund and still in place after the closure of the action Percentage of equipment acquired under the Fund in use after the end of the projects	Documentary review: National Evaluation Reports National Programmes Annual Implementation Reports Interviews: National RA Relevant Beneficiaries of

			Share of maintenance cost of equipment acquired under the Fund on the total EU contribution to actions co-finance by the Fund Retention of staff trained ex-ante and ex-post with respect to training delivered through the Fund Stakeholders' judgment on whether outcomes/benefits of the actions sustained by the Fund are likely to continue thereafter	funding EMAS, UA, NP Relevant EU agencies and EC DGs Survey Case Studies
	Sub-EQ9.4. What measures were adopted to ensure the continuity of the activities carried out thanks to the operating support?	Measures adopted provide a sound basis for the continuity of actions supported by the Fund	Number of measures adopted to ensure the continuity of actions supported by the Fund Share of respondents who considered the measures as sound and adequate Consensus / divergence among the interviewees on the measures adopted to ensure the continuity of actions supported by the Fund	Documentary review: National implementation and evaluation reports Interviews: National RA Relevant Beneficiaries of funding EMAS, UA, NP Relevant EU agencies and EC DGs Survey Case Studies

Simplification and reduction of administrative costs

Theme	Simplification and reduction of administrative costs		
Question	Judgment criteria	Indicators	Sources

EQ.10. Were the Fund management procedures simplified and the administrative burden reduced for its beneficiaries?	The use of simplified cost options reflected in simplification of procedures and reduction of administrative burden for the different stakeholders concerned Operating support was used in a cost-effective manner and reduced administrative burden for the actors involved Special schemes were used in a cost-effective manner and reduced administrative burden for the actors involved	Number and type of simplification measures used into the National Programmes (e.g. simplified cost options) Level of financial resources used Number and type of special schemes used Level of operating support used financial resources used Variance in the use of simplified cost options across MS Perception of stakeholders regarding the cost-effectiveness of simplified options in place Perception of consulted stakeholders regarding the extent to which operating support reduced administrative burden	Documentary review: Annual Implementation Reports National evaluations Country case study interviews Thematic case study interviews Survey for end-beneficiaries Interviews at MS level

Additional information for the assessment of coherence

Coherence with Home Affairs Funds - Overview of Home Affairs Funds (2014-2020)

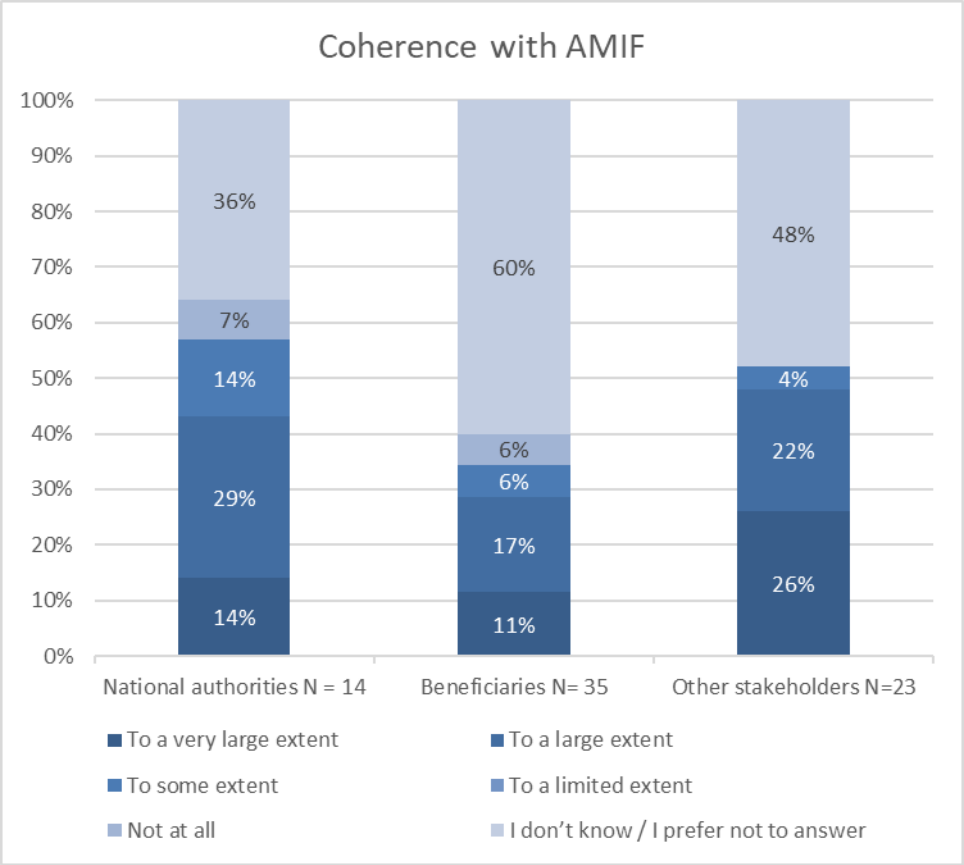
Fund	Final buget	Objectives	Types of activities and beneficiaries
ISF-Police (2014-2020)	EUR 1,215 million out of which for MS programmes EUR 751.6 million	General objective: ensuring a high level of security in the EU. The funding instrument has two specific objectives: -Fight against crime: Combating cross-border, serious and organised crime including terrorism, and reinforcing coordination and cooperation between law enforcement authorities and other national authorities of EU States, including with EUROPOL and other relevant EU bodies, and with relevant non-EU and international organisations. -Managing risk and crisis: Enhancing the capacity of EU States and the Union for managing effectively security-related risk and crisis, and preparing for protecting people and critical infrastructure against terrorist attacks and other security related incidents.	Activities funded include: setting up and running IT systems, acquisition of operational equipment, promoting and developing training schemes and ensuring administrative and operational coordination and cooperation. Beneficiaries include: state and federal authorities, local public bodies, non-governmental organisations

			and private and public law companies.
AMIF (2014-2020)	EUR 7,595 million out of which for MS programmes EUR 4,575.5	General objective: promote the efficient management of migration flows and the implementation, strengthening and development of a common Union approach to asylum and immigration. The funding instrument has four specific objectives: -Asylum: strengthening and developing the Common European Asylum System by ensuring that EU legislation in this field is efficiently and uniformly applied; -Legal migration and integration: supporting legal migration to EU Member States in line with the labour market needs and promoting the effective integration of non-EU nationals; -Return: enhancing fair and effective return strategies, which contribute to combating irregular migration, with an emphasis on sustainability and effectiveness of the return process; -Solidarity: making sure that EU States which are most affected by migration and asylum flows can count on solidarity from other EU States.	Activities funded include: improvement of accommodation and reception services for asylum seekers, information measures and campaigns in non-EU countries on legal migration channels, education and language training for non-EU nationals, assistance to vulnerable persons belonging to the target groups of AMIF, information exchange and cooperation between EU States and training for staff on relevant topics of AMIF. Beneficiaries include: state and federal authorities, local public bodies, non-governmental organisations, humanitarian organisations, private and public law companies and education and research organisations.

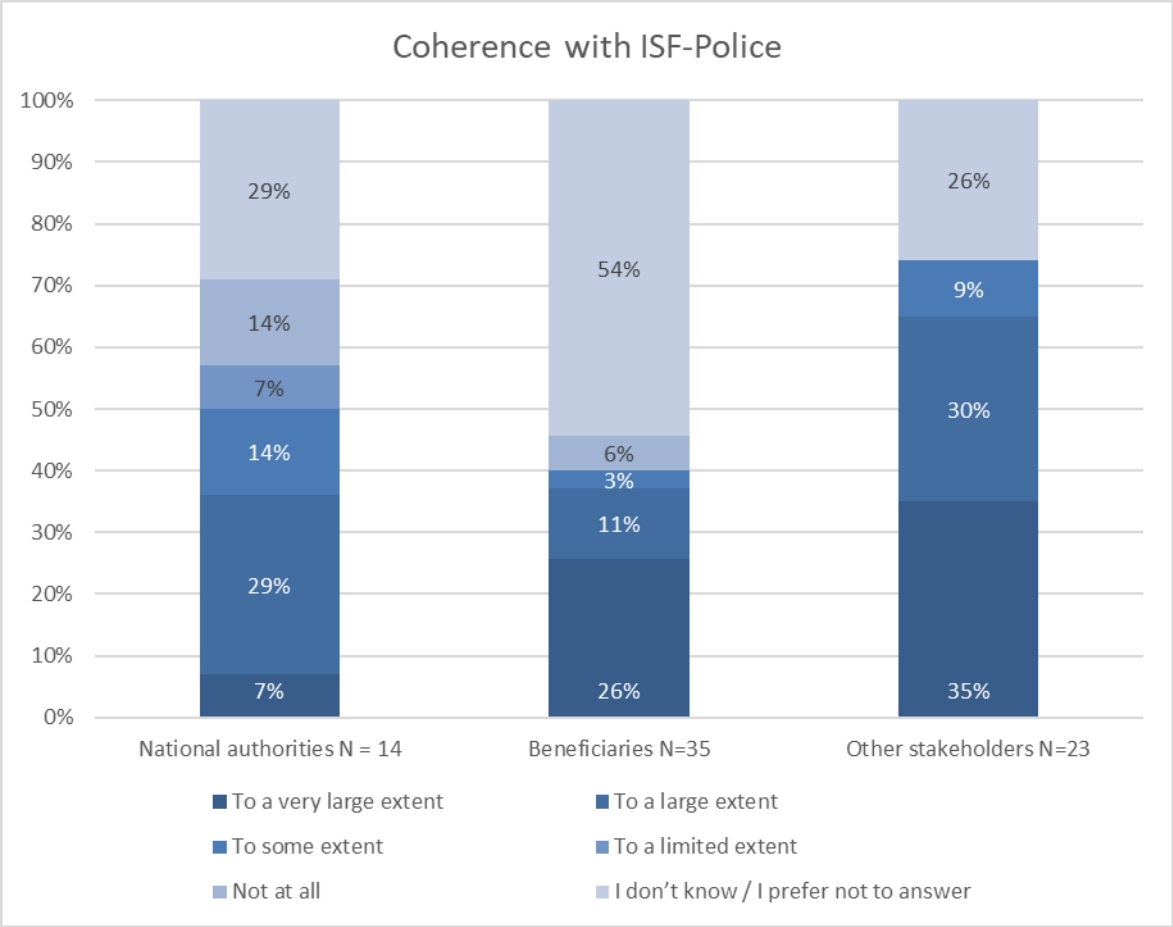
Source: European Commission website on ISF-Police ([251]) and AMIF ([252])

(251) Internal Security Fund - Police (2014-2020) - European Commission
(252) Asylum, Migration and Integration fund (2014-2020) - European Commission

Figure 21 - Coherence between ISF-BV and AMIF (% responses)



Source: Targeted survey responses to: "In your opinion, were the actions implemented through the ISF-BV and BMVI Instruments coherent with and non-contradictory (no duplications or overlap) to other EU interventions with similar or complementary objectives? - Asylum, Migration and Integration" N= as indicated in figure .



Note: While the 14 responses from national authorities only include those relevant to ISF-BV, the answers of beneficiaries and other stakeholders cover both programming periods (ISF-BV and BMVI funding)

Coherence with other EU funding instruments (2014-2020)

Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
Customs 2020 Programme, DG TAXUD	2014-2020	€522.9 million	The Customs 2020 Programme supported the modernisation of the Customs Union, by increasing information and data exchange between national customs administrations to better detect the flow of dangerous and counterfeit goods; by supporting customs authorities in protecting the financial and economic interests of the Union, as well as in the correct collection of customs duties, import VAT and excise duties, by devising better risk management strategies to protect the EU's financial interests; and help the EU better respond to security threats and transnational crime; and by continuing to facilitate growing levels of trade. (253)	As noted in the Interim evaluation of the ISF-BV, the ISF-BV and Customs 2020 Programme share common objectives related to security as well as similar activities (such as training). Customs authorities have a broad range of supervisory and control responsibilities in relation to goods imported into the EU. They cooperate in the fight against fraud, terrorism, and organised crime together with law enforcement authorities responsible for border and internal security. (254) The ex-post evaluation of the Customs 2020 Programme confirmed that Commission and national customs officials acknowledged that the programme aligned well with broader EU initiatives including the Internal Security Fund (ISF). (255) However, the evaluation did not provide any concrete examples of cooperation or complementarities.	Inter-service Consultation, through which DG TAXUD comments on the ISF-BV Work Programme Joint meetings (256) and DG HOME and DG TAXUD work on documents and guidelines concerning co-operation aspects of border guards and customs services. DG HOME also sits on the Horizon 2020 Steering group (other DGs incl., DG OLAF, DG BUDG, DG GROW, DG ECFIN, and DG REFORM) to ensure synergies and avoid overlaps. (257)
Horizon 2020	2014-2020	€75.6 billion	Horizon 2020 was the financial	The ISF-BV Regulation foresees for ISF-BV to	Inter-Service Consultation,

(253) European Commission, '2014-2020 Customs programme', European Commission website, accessed 13 November 2024, https://taxation-customs.ec.europa.eu/eu-funding-customs-and-tax/customs-2020_en.
(254) European Commission: Directorate-General for Taxation and Customs Union, 'Study on the final evaluation of the Customs 2020 programme', 13 December 2021, p. 109.
(255) European Commission: Directorate-General for Taxation and Customs Union, 'Study on the final evaluation of the Customs 2020 programme', 13 December 2021, p. 111.
(256) ISF-BV Interim evaluation
(257) ISF-BV Interim Evaluation.

Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
			instrument implementing the Innovation Union, a Europe 2020 flagship initiative aimed at securing Europe's global competitiveness. ([258])	fund Union actions that have the objective to "support particularly innovative projects developing new methods and/or technologies with a potential for transferability to other Member States, especially projects which aim to test and validate research projects". ([259]) The Horizon 2020 programme can fund research and innovation in the field of security and border management. One example, highlighted in the interim report, included the call « Societal Challenge 'Secure Societies — protecting freedom and security of Europe and its citizens'. The ex-post evaluation of the Horizon 2020 programme noted that the programme helped make Europe more secure by supporting crime prevention and counter terrorism initiatives, improving border surveillance and improving disaster resilience, but did not specifically cover the coherence with ISF-BV. ([260])	through which the relevant unit with DG HOME that managed security related R&D funded under Horizon 2020 can comment on the ISF-BV Work Programmes
ESIF (ESF and ERDF)	2014-2020	ERDF: €185 billion (261)	The ESF and the ERDF can help facing the migration pressure experienced by the EU by supporting long -	In terms of beneficiaries, the authorities involved in ESF and ERDF are different from the beneficiaries of the ISF-BV. However, the types of activities can be	Inter-Service Consultation, through which DG EMPL and DG REGIO can comment on the ISF-BV Work Programmes

(258) European Commission, 'What is Horizon 2020?', European Commission website, accessed 13 November 2024, What is Horizon 2020? | Horizon 2020.
(259) Article 13 (2)(i) ISF-BV Regulation
(260) European Commission, '*Ex post* evaluation of Horizon 2020, the EU framework programme for research and innovation', COM(2024)49, 29 January 2024, p. 4.
(261) Regulation (EU) No 1301/2013 on the European Regional Development Fund and on specific rules about the investment for growth and jobs goal, 'Summary', EUR-Lex website, accessed 13 November 2024, European Regional Development Fund (2014-2020) | EUR-Lex.

Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
		ESF: €74 billion (262)	term integration of migrants. The ESF was Europe's main instrument for supporting jobs, helping people get better jobs and ensuring fairer job opportunities for all EU citizens. (263) The ERDF aims to promote the EU's harmonious, balanced and sustainable development by correcting some of the differences in levels of development between its regions. (264)	similar to those funded under ISF-BV (although more closely linked to AMIF): **ESF**: Similar activities can be funded to similar target groups (e.g. trainings and capacity building of public administration and public services). **ERDF**: in the field of migration, the Fund aims at integrating migrants and asylum seekers through investments in social, health, education, housing and childcare infrastructure. In exceptional circumstances, the ERDF might support emergency measures that are consistent with the ISF-BV. With regard to the specific protection needs of unaccompanied children and families with children, the ERDF can provide support for building or extending reception centres and shelters or reinforcing capacity at reception services, infrastructural development in hotspots, mobile hospitals as well as sanitation and water supply. (265)	
Development Cooperation Instrument (DCI) (lead: DG DEVCO, now INTPA but also EEAS and DG EAC)	2014-2020	€19.97 billion	The DCI was the main financial instrument in the EU budget for funding aid to developing countries.	ISF-BV funding in, and in relation to third countries As per the preamble of the Horizontal Regulation (EU) 514/2014 (recital 8) and ISF-BV Regulation (recital 36), activities	The ISF-BV Regulation notes that "full coherence should be sought with the principles and general objectives of the Union's external action and foreign

(262) European Parliament, 'European Social Fund Plus', European Parliament website, accessed 13 November 2024, European Social Fund Plus | Fact Sheets on the European Union | European Parliament.
(263) European Commission, 'What is the ESF?', European Commission website, accessed 13 November 2024, What is the ESF?.
(264) Regulation (EU) No 1301/2013 on the European Regional Development Fund and on specific rules about the investment for growth and jobs goal, 'Summary', EUR-Lex website, accessed 13 November 2024, European Regional Development Fund (2014-2020) | EUR-Lex.
(265) ISF-BV Interim Evaluation.

Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
				funded by ISF-BV can fund actions « in, and in relation to, third countries ». While the data does not allow to identify the actions «in, and in relation to third countries » funded by the ISF-BV National Programmes ([266]), the following ISF-BV Union Actions appear to be in, or in relation to » third countries » : Direct management: nine projects under direct management (amounting to a total of EUR 4.5 million funded under ISF-BV). ([267]), Indirect management: Since 2016, ISF-BV launched calls for proposals under the Migration Partnership Facility (MPF), the EU initiative managed by ICMPD that aims at strengthening dialogue and cooperation on migration and mobility issues between EU Member States and partner countries. Overall, 13 projects were funded relating to the following third countries : Armenia, Belarus, Georgia, Moldova, and Pakistan (amounting to a total of EUR 4.4 million funded under ISF-BV). Interviews with DG INTPA, DG NEAR and EEAS confirmed that :	policy related to the country or region in question". However, the Regulation does not specify how this coordination should take place and with which actors. The key coordination tool has been the Inter-Service Consultation, through which DG NEAR and DG INTPA can comment on the Annual Work Programmes and planned calls for proposals and ensure there is no overlap with the actions funded.v-DG INTPA, DG NEAR and EEAS were part of Steering Group of ISF-BV Migration Partnership Facility, with active involvement in the programming phase (e.g. being part of the decision board involved in the evaluation of proposals) Interviews confirmed coordination during the implementation of the MPF was more limited to participation in the MPF conference where Member States and third countries present on the implementation progress. v

(266) The financing plan of the programme (section 7) does not include a specific budget line for funding in and in relation to third countries.

(267) Out of the 18 Union Actions under direct management funded, the following nine projects related to third countries: Regional Cooperation on Border Management among Turkey, Greece and Bulgaria - Phase I, Cooperation on Border Management among Turkey, Bulgaria and Greece - Phase II, Development of Information Exchange Gear of Baltic states (BSIEG 2), Improvement of the Security at the EU External Borders and Enhance the Cooperation with Turkey for Addressing the Migratory Pressure (PRIORITY), Enhancement of Immigration Liaison Officers' activities in Vietnam/ EURLO Vietnam, CONSULASSIST, Common Airport Liaison Officers (CALO), Ghanaian Identity-Chain Capacity Building – Analytical evaluation (GIC_A), MigraSafe – Africa.

Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
				The interviewees confirmed that it was not possible to provide an overview of border management related funding under these funds, but that a migration marker had been put in place since 2021 (under NDICI). There is limited potential for overlap and synergies between the actions led by DG INTPA, as ISF-BV does not tend to cover the same regions (e.g. Africa). In this geographical area there are more synergies with AMIF , also thematically in terms of reintegration and return. There is more potential for overlap and synergies between ISF-BV funding in the neighbourhood/countries that share a border with the EU, as those are the same countries covered by DG NEAR. However here interviews highlighted that overlaps were limited too as in general the external action instruments cover the heavier equipment purchases, and more expensive capacity building, while the Home Affairs Funds tend to fund more operational coordination.	
European Neighbourhood Instrument (ENI) (EEAS, DG NEAR, DG ECFIN, DG DEVCO, now INTPA)	2014-2020	€17.57 billion	The ENI financed the European neighbourhood policy, which aimed at supporting political, economic and social reform processes in the EU's neighbouring countries.		

Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
Instrument for Pre-accession Assistance II (IPA II) (DG NEAR, DG DEVCO, now INTPA, EEAS)	2014-2020	€12.8 billion ([268])	General objective is to help the IPA II beneficiaries align themselves with EU rules, standards, policies and practices to prepare for EU membership by promoting political, institutional, legal, administrative, social and economic reforms. The most important novelty of IPA II was its strategic focus which provided for a stronger ownership by the beneficiaries through integrating their own reform and development agendas. IPA II targeted reforms within the framework of pre-defined sectors which covered areas closely linked to the enlargement strategy, such as democracy and governance, rule of law, and growth and competitiveness. ([269])		
European Instrument for Democracy and Human Rights (EIDHR) (DG DEVCO, now INTPA, DG NEAR, DG ECHO, EEAS and FPI)	2014-2020	€1.25 billion	The EIDHR aimed at providing support for the promotion of democracy and human rights in non-EU countries.		
Partnership Instrument for Cooperation	2014-2020	€961.7 m	The PI was the EU's first instrument specifically designed		

(268) European Commission, 'Overview - Instrument for Pre-accession Assistance', European Commission website, accessed 13 November 2024, Overview - Instrument for Pre-accession Assistance - European Commission.
(269) European Commission, 'Overview - Instrument for Pre-accession Assistance', European Commission website, accessed 13 November 2024, Overview - Instrument for Pre-accession Assistance - European Commission.

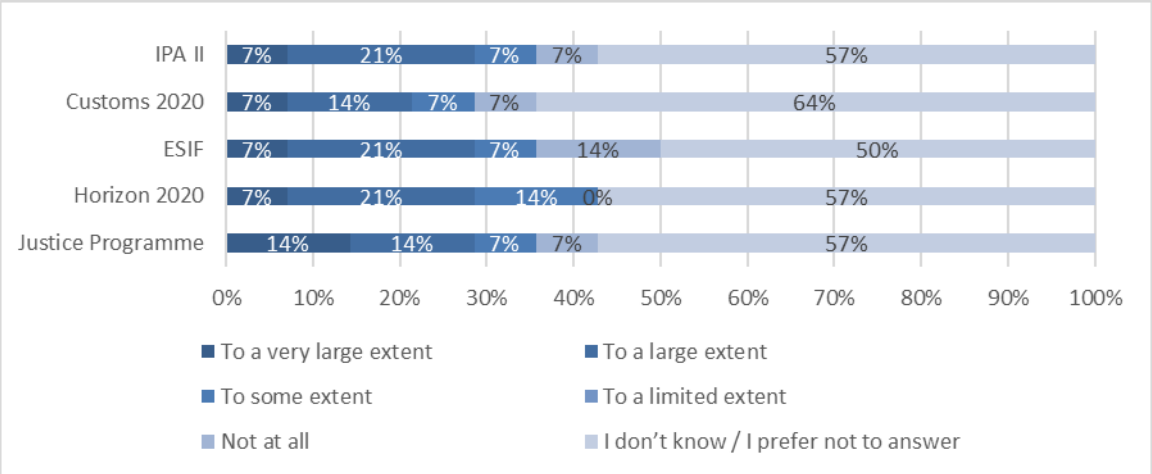
Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
with Third Countries (PI) (FPI, DG DEVCO, now INTPA)			to promote the EU's strategic interests worldwide by reinforcing its external strategies, policies and initiatives. ([270])		
11th European Development Fund (EDF) (DG DEVCO, now INTPA, DG BUDG, EEAS, EIB, Investment Facility	2014-2020	€30.5 billion ([271])	The EDF is the largest financing instrument contributing to turn into action the European Union's development policy and external action. Its objective is to help 79 countries in Africa, the Caribbean and the Pacific alleviate poverty and to support the 25 Overseas Countries and Territories that all have a special link with some EU Member States to improve their competitiveness and reduce their vulnerability. ([272])		
Justice programme (DG JUST)	2014-2020	€377.6 m ([273])	The Justice programme covers: (1) Judicial cooperation in civil and criminal matters, (2) Judicial training, (3) Effective access to justice in Europe, including rights of victims of crime and procedural rights in criminal proceedings, and (4) Initiatives in the field of drugs policy	Limited, as Justice Programme has a distinct focus and covers different beneficiaries (in the area of police and judicial cooperation).	Inter-Service Consultation, through which DG JUST comments on the ISF-BV Work Programme EU level interviews further noted the following coordination mechanisms: -DG JUST supports beneficairies in navigating through

(270) European Commission, 'Global Europe: The Neighbourhood, Development & International Cooperation Instrument', European Commission website, accessed 13 November 2024, Global Europe: The Neighbourhood, Development & International Cooperation Instrument - European Commission.
(271) European Commission, 'Evaluation of the 11th European Development Fund, Commission Staff Working Document', SWD(2017)601, 15 December 2017, p. 2.
(272) European Commission, 'Evaluation of the 11th European Development Fund, Commission Staff Working Document', SWD(2017)601, 15 December 2017, p. 2.
(273) European Parliament, 'Justice programme (2014-2020)', Briefing, How the EU budget is spent, European Parliament website, February 2017, accessed 13 November 2024, Justice Programme (2014-2020).

Funding Instrument + Managing DG	Period	Budget in EUR	Description	Possible area of overlap/synergies with ISF-BV	Mechanism for coordination/ensure synergies
			(judicial cooperation and crime prevention aspects). ([274])		the EU funds, incl DG Home funds. -DG HOME and DG JUST sometimes sit in each others' expert groups.

(274) European Commission, 'Justice Programme', European Commission website, accessed 13 November 2024, Justice Programme - European Commission - DG Justiceunknown label.

Figure 22: Responses to the survey question: In your opinion, were the actions implemented through the ISF-BV and BMVI Instruments coherent with and non-contradictory (no duplications or overlap) to other EU interventions with similar or complementary objective



Source: Targeted survey responses to: "In your opinion, were the actions implemented through the ISF-BV and BMVI Instruments coherent with and non-contradictory (no duplications or overlap) to other EU interventions with similar or complementary objectives? N= 14 responses from national authorities only include those relevant to ISF-BVlll

ANNEX IV: OVERVIEW OF BENEFITS AND COSTS

The aim of this analysis was to identify, map, and assess the costs and benefits entailed by the implementation of the ISF-BV Fund, considering different types of stakeholders.

In this sense, the following steps were implemented for the purposes of cost estimation:

1. *Step 1. Mapping of costs*: At this stage, we have identified and listed the potential costs entailed by the implementation of the ISF-BV for different categories of stakeholders.

2. *Step 2. Data collection*: We reviewed Instrument monitoring data, data collected through targeted surveys and interviews and desk research (NPs, AIRs, Final implementation reports, mid-term and ex-post national evaluations)

3. *Step 3. Estimation of costs:* The purpose of this estimation had been to monetize the different types of costs identified under Step 1.

In accordance with tools #56, #57 and #58 of the Better Regulation Toolbox, the types of costs that have been identified and mapped are included in the table below. Based on the Fund monitoring data, we were able to quantify the data related to financial allocations and spending under the national programmes, as well as the value of the technical assistance. ([275]) However, costs related to the number of FTEs deployed by the different stakeholders, as well as perceived administrative burden could not be quantified due to limited information. Therefore, the analysis we performed focuses on the financial costs.

The identification, mapping, and assessment of benefits followed the same methodological steps. Considering the Instrument's level of implementation, the benefits analysis focused on the common indicators, as presented below.

(275) Source: SFC2014_-ISF_NP_(Implementation_and_Absorption_Rates)_22.12.2023.

Table 8 - Mapping of costs and benefits entailed by the implementation of the ISF-BV Fund

Cost or benefit		Citizens/ consumers		Businesses		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
ISF- BV total funding out of which:	One-off					EUR 2 760 million out of which:			
- ISF BV Shared management funding (including TA)	One-off					EUR 1 705 million			
- ISF BV Direct management funding	One-off					EUR 264 million (with at least 30% for Union Actions)			
- ISF- BV Envelope for setting up IT systems supporting the management of migration flows across the external borders	One-off					EUR 791 million			
Direct compliance costs:									
- Adjustment costs									
- Administrative costs	Recurrent					Number of FTEs dedicated to the administrative activities performed to comply with administrative obligations included in legal rules		Number of FTEs dedicated to the implementation and reporting progress on project	

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Cost or benefit		Citizens/ consumers		Businesses		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
								activities / number of implemented projects	
- Regulatory charges									
Enforcement costs, meaning costs associated with activities linked to the implementation of an initiative such as: - Monitoring	Reccurent					Number of FTEs dedicated to monitoring the implementation of projects			
- Inspections	Recurrent					Number of FTEs dedicated to inspections/audits			
- Adjudication/ litigation									
Indirect compliance costs (related to the fact that other stakeholders have to comply with legislation)									
Other indirect costs:									
Direct benefits						**Enhanced capacity** by: - Increased number of staff trained and number of training courses in aspects related to Common visa policy - Incresead number of staff trained and number of training courses in			

Cost or benefit		Citizens/ consumers		Businesses		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
						aspects related to border management **Integrated border management by:** - Number of consular cooperation activities developed with the help of the Instrument - Number of specialised posts in third countries supported by the Instrument - Percentage and number of consulates developed or upgraded with the help of the Instrument out of the total number of consulates **Development of advanced border infrastructure and technology by**: - Number of border control (checks and surveillance) infrastructure and means developed or upgraded with the help of the Instrument - Number of national border surveillance infrastructure established/further developed in the framework of EUROSUR - Increased number of border crossings of the external borders through ABC gates supported from the Instrument			

Cost or benefit		Citizens/ consumers		Businesses		Administrations		Other (direct beneficiaries of the Fund, other than citizens / businesses)	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
Indirect benefits		A high level of security within the Union, while safeguarding the free movement of persons within it				Support for the harmonized implementation of the Union acquis and stronger and more effective European integrated border management at the Union's external borders		Increased and more effective cross-country cooperation in the field of security, border management and visa	

The baseline, target, and achieved values of the common indicators were retrieved based on the Instrument monitoring data, covering the implementation period up to 31 December 2022. ([276])

To address the evaluation question regarding the extent to which the expected results of the Instrument were achieved at a reasonable cost—assessing the financial and human resources deployed—we require information on both the financial resources spent and the performance indicators reflecting outcomes. Currently, there is no available information on human resources; therefore, the only input we can consider is the expenditure amounts noted at the national level. Within the report, the expenditures have been quantified as the total amount spent by each country, cumulative 2022 values.

In terms of outcomes for **SO1-support a common visa policy**, the following **output indicators** were used in the analysis: number of consular cooperation activities developed with the help of the Instrument (C1), number of staff trained in common visa policy related aspects with the help of the Fund (C2.1), number of specialised posts in third countries supported by the Instrument C3), percentage of consulates developed or upgrade with the help of the Instrument (C4.2)

In terms of outcomes for **SO2-borders**, the following **output indicators** were used: number of training courses in borders management related aspects with the help of the Fund (C1.2), Number of border control (checks and surveillance) infrastructure and means developed or upgraded with the help of the Fund (C2), number of border crossings of the external borders through ABC gates supported from the Fund (C3.1), total number of border crossings (C3.2), number of national border surveillance infrastructure established/further developed in the framework of EUROSUR (C4), number of incidents reported by the Member State to the European Situational Picture (C5).

To provide a response to our evaluation question, three approaches have been tested, as presented in the text box below.

Text box 2. Tested approaches for conducting the cost-effectiveness analysis

Dimensionality reduction on output indicators to synthesize and visualize the information contained in multiple output variables:

4. This approach is often used when the data set contains numerous variables, which can make the analysis complex and obscure meaningful patterns. By reducing the dimensions, the technique condenses the data into a smaller set of representative variables, making it easier to interpret and visualize. The primary advantages include simplifying the data structure, enhancing interpretability, which facilitates more effective analysis and clearer insights without significant information loss. By reducing the dimensionality of the data, the analysis provides a clearer, synthesized view of output indicators, aiding decision-makers in assessing effectiveness of resource allocation and evaluating performance.

5. A limitation of applying dimensionality reduction on the output indicators was due to the sparsity of certain variables (e.g., the outcome indicator C1, "Number of consular cooperation activities developed with the help of the Fund") and the heterogeneity of others. This sparsity coupled with the presence of numerous NA values and a limited

(276) Source: SFC2014_ISF_AIR_Indicators_report_23.02.2024.

sample size, restricts the effectiveness of multivariate analysis techniques, potentially reducing the robustness of the results. The primary challenge with the target variable, set individually by each country for each output indicator, was the presence of inconsistent values. These inconsistencies appeared as significant underestimations or overestimations, affecting the accuracy and relevance of the results. A limitation of the analysis is that certain countries had predefined targets for specific indicators, while others did not set any targets (target 0), leading to inconsistencies and numerous NA values. This discrepancy hinders a comprehensive comparative analysis, as the absence of uniform target-setting across countries introduces variability that may skew the synthesized results.

Cluster analysis to group countries into homogeneous clusters based on their output indicators:

6. The aim was to identify patterns that explain differences in outcomes and assessing efficiency.

7. However, due to extreme heterogeneity across output indicators among countries, drawing robust conclusions on performance is challenging, limiting the analysis's ability to provide clear insights into efficiency.

Cluster analysis to identify distinct profiles based on the distribution of EU contributions across national priorities or specific action categories for each country:

8. These profiles, or clusters, group countries with similar focus patterns on specific priorities. Clustering proved ineffective because, from the perspective of output indicators, all countries—regardless of cluster—produced similar common indicators, varying only in magnitude.

By applying this variety of analytical approaches, it was found that none adequately addressed the evaluation question. Each method encountered limitations that hindered their effectiveness in providing a robust response. All approaches suffered from variable rareness, heterogeneity, and inconsistencies in target-setting, leading to skewed results. Thus, we proposed a **different approach that addresses the limitations of previous methods** by ensuring that missing values (due to the absence of setting a non-zero target value for output indicators) do not result in the elimination of observations, and that the lack of set targets for certain output indicators does not penalize countries in performance assessment.

The analysis comprises the achievement percentage of the above-mentioned output indicators at the level of 2022 (cumulative values). For each indicator, the achieved value is compared to the initial target value to calculate the achievement percentage: **OI Achievement Percentage** = (Achieved Value indicator / Target Value) × 100 (1).

With this analysis, we aim to measure the extent to which each country has achieved its goals for specific output indicators by the end of 2022. By calculating the achievement percentage for each indicator, we assess the degree of success relative to the targets initially set by each country. For countries with no target value for an OI (target = 0), the achievement percentage of 0% was replaced with "NA" (Not Applicable). This clarifies that the country did not aim to meet that objective, without affecting averages or other percentage-based statistics. Thus, achievements were reported only for countries with a target value for the respective indicator, excluding cases marked as "NA". This metric provides insight into effectiveness by showing how close each country came to reaching its goals, enabling comparisons across indicators and countries.

Furthermore, a **general performance score** was calculated as an average score of OI achievement percentage at the level of each country and then this score has been scaled to lie between 0 and 100, where 100 is the country with the highest performance.

7. Besides the overall performance score of each country, we have used also **the absorption rate** which provides a measure of the capacity to utilize available funds. A high absorption rate suggests that funds were correspondingly used, without leaving unused resources. A low absorption rate may indicate implementation issues, reduced project management capacity, delays, or administrative obstacles.

Analysing the absorption rate in relation to the overall performance provides insights on the discrepancies between countries. If the absorption rate is high but the overall performance score is low, it suggests that funds were spent effectively (since the resources were used) but not efficiently (as the desired outcomes were not fully achieved). Conversely, if the absorption rate is low but performance is high, this indicates high efficiency in resource utilization, as strong results were achieved with fewer resources.

The following two graphics presented the distribution of countries in four quadrants with the following description:

9. **Top-Right Quadrant (High Absorption Rate, High Performance Score)**: countries in this quadrant exhibit both high absorption rates and high-performance scores.

10. **Top-Left Quadrant (Low Absorption Rate, High Performance Score)**: countries with lower absorption rates but high-performance scores.

11. **Bottom-Right Quadrant (High Absorption Rate, Low Performance Score)**: countries with high absorption rates but lower performance scores.

12. **Bottom-Left Quadrant (Low Absorption Rate, Low Performance Score)**: countries in this quadrant have both low absorption rates and low performance scores.

Figure 23 - Country Performance and absorption rate with expenditures for SO1

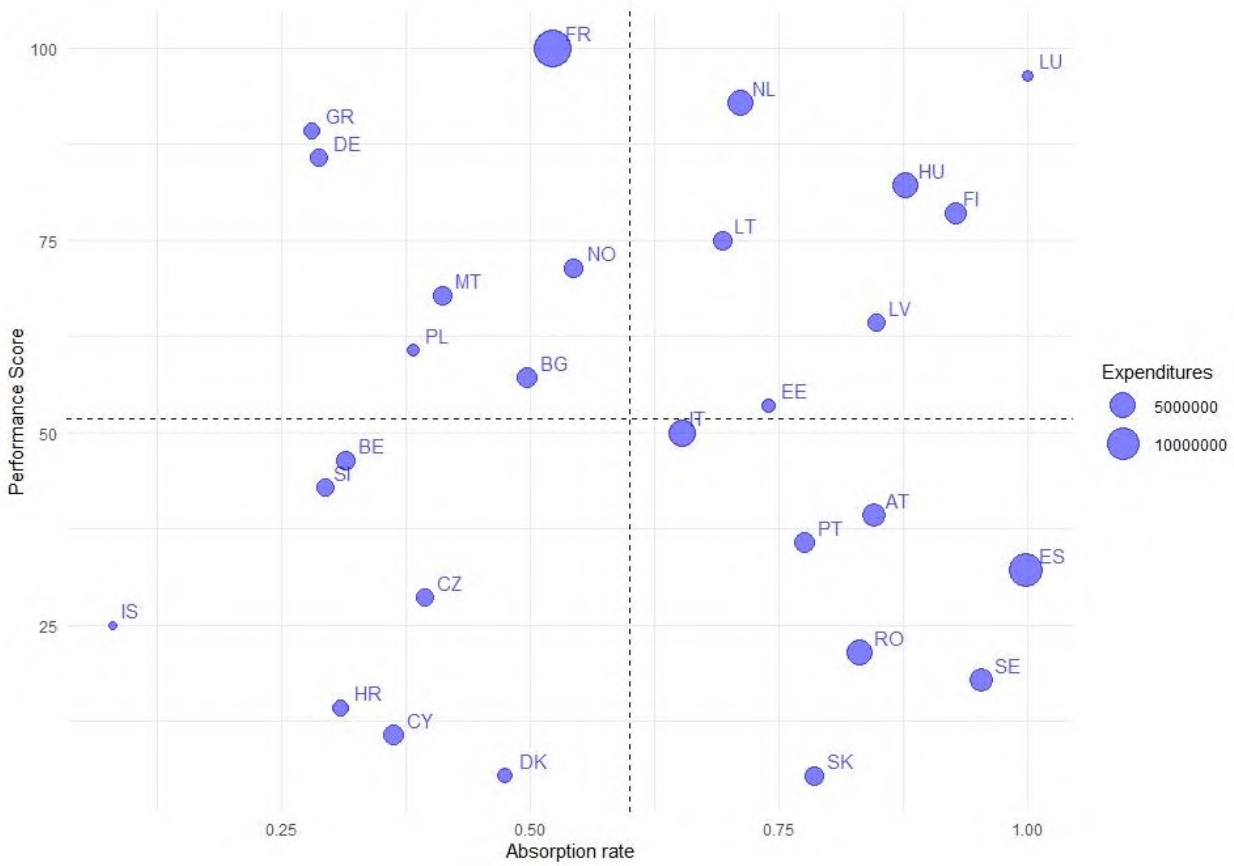
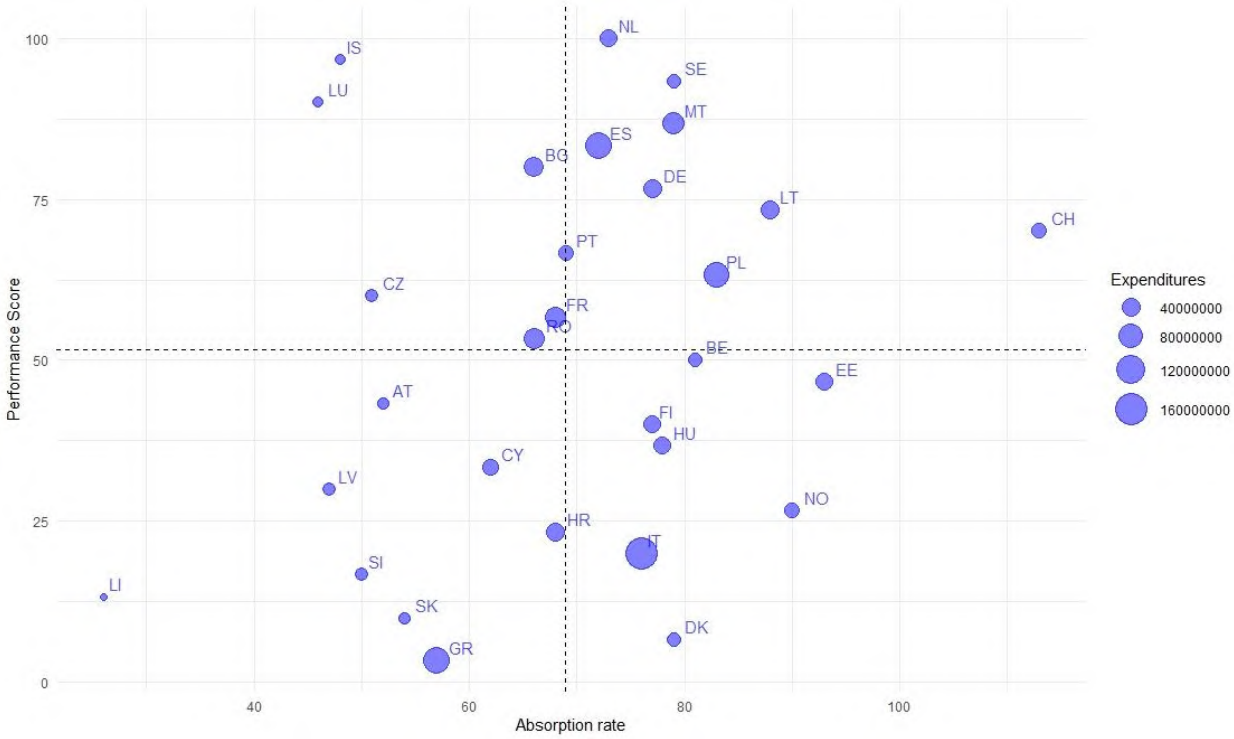


Figure 24 - Country Performance and absorption rate with expenditures for SO2



Analysing the discrepancies between countries in terms of overall performance, absorption rate and allocation of resources(expenditures), several profiles can be highlighted:

13. **High Performers with High Absorption Rates and Expenditures**: Countries with high performance scores also exhibiting high absorption rates (top-right quadrant) and larger expenditure amounts indicate that substantial funds were effectively managed, achieving the expected results.

14. **Efficient Performers with Moderate Resources**: show strong performance scores and high absorption rates (top-left quadrant) with moderate expenditure sizes, indicating effective use of available funds. This suggests that even with relatively smaller financial deployments, these countries achieved significant outcomes, showcasing cost efficiency.

15. **Balanced but Moderate Performers**: Countries that have mid-range performance scores and absorption rates, along with moderate expenditures. These countries appear to have achieved reasonable results given their financial inputs, indicating a satisfactory balance between outcomes and costs.

16. **Underperformers with High Absorption Rates**: countries with high absorption rates but relatively low performance scores (Bottom-Right Quadrant) implying that while funds were fully utilized, the effectiveness of those funds in achieving high performance was limited.

17. **Low Performers with Low Absorption and Small Expenditures**: Countries that exhibit low performance scores and low absorption rates (Bottom-Left Quadrant) with smaller expenditures. Their limited results could be attributed to both low financial input and possible inefficiencies, indicating a need for targeted interventions to improve both fund utilization and outcome achievement.

Furthermore, an efficiency score has been computed by **incorporating all three variables**—performance score, total expenditures and absorption rate. The challenge is balancing high performance and absorption with the level of spending, as high expenditures may suggest efficiency issues despite strong outcomes. To compute this measure, the following steps were undertaken:

1. Normalize Each Variable: Standardize the expenditures variable to make it comparable with the others.

2. Define Efficiency in Terms of Performance vs Expenditures:

$$\boldsymbol{Efficiency\ Score = \frac{Performance\ Score \times Absorption\ Rate}{Expenditures}}$$

This formula rewards high performance and high absorption rates but penalizes high spending, balancing all three aspects.

3. Furthermore, **this efficiency score has been scaled to lie between 0 and 100**, where 100 is the country with the highest efficiency. In order to identify the top performers, we have used the threshold of 75. A threshold of 75 represents the upper quartile of a 100-point scale, which is commonly used as a benchmark to separate high performers from the rest. This threshold is frequently used in efficiency analysis to signify excellence, as it captures the top 25% of all scores.

Figure 25 - Efficiency scores for SO1

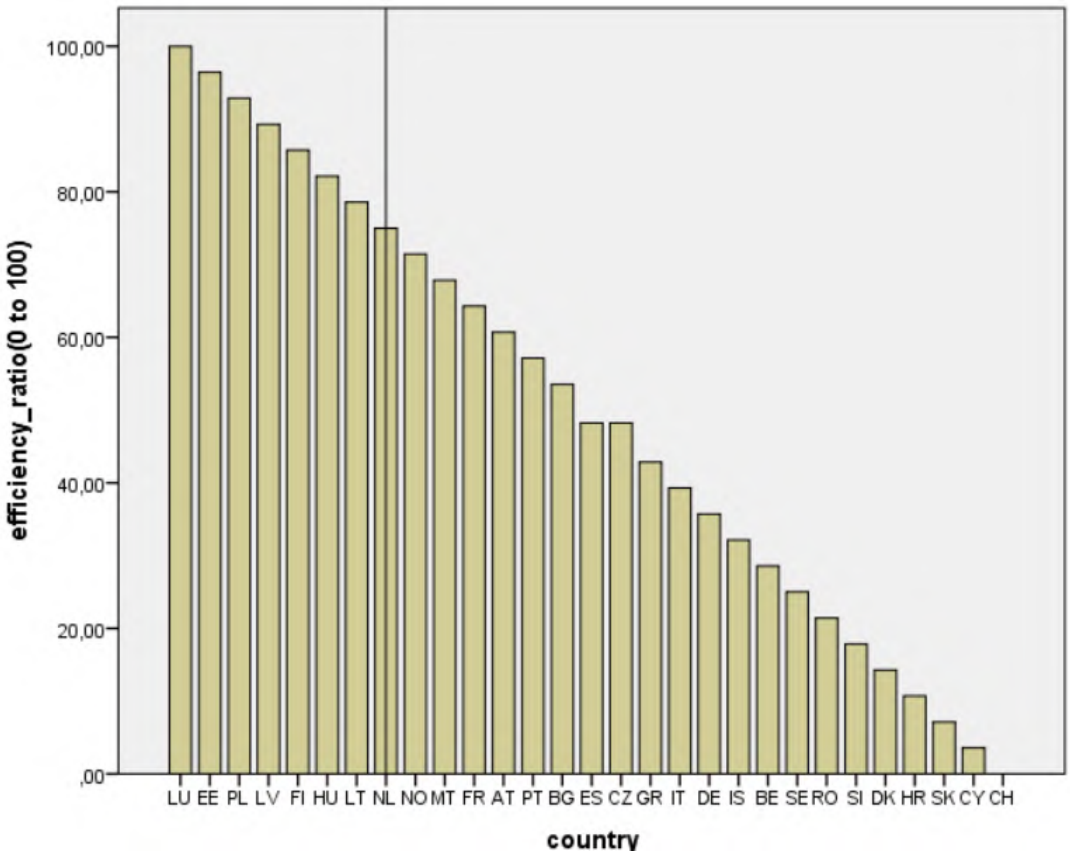
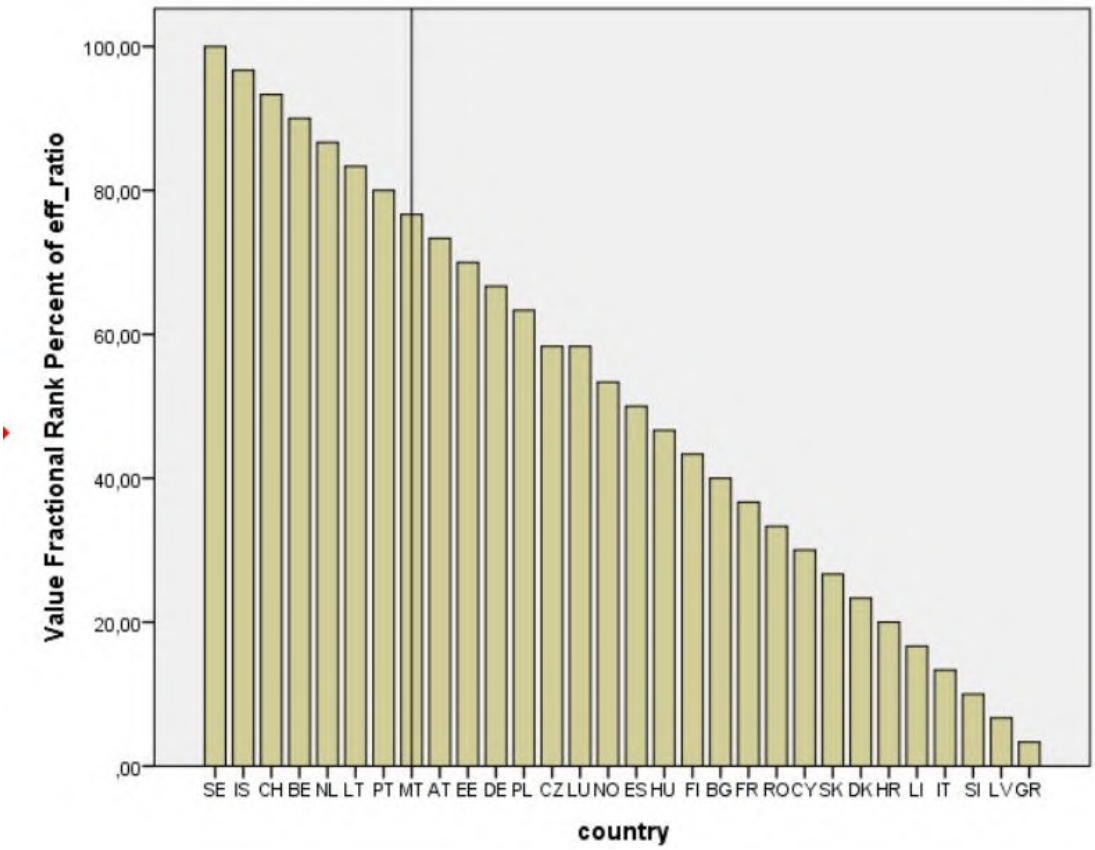


Figure 26 - Efficiency scores for SO2



The chart presents a ranking of countries based on their efficiency scores, calculated from the interplay between performance and absorption rate relative to expenditures.

From a policy perspective, this ranking highlights the degree to which countries have achieved the expected results of the Instrument efficiently, optimising both performance and resource utilization.

Top performers demonstrate high efficiency, achieving substantial outcomes at a relatively low cost. **Mid-tier performers** show moderate efficiency, implying they achieved their goals with reasonable resource usage. These countries achieved a satisfactory level of results but could explore strategies from top performers to enhance their efficiency. **Low performers** reflect lower efficiency scores, suggesting a potential mismatch between financial input and output. In these cases, funds were less effectively absorbed or translated into high performance.

In conclusion the extent to which the expected results of the Instrument were achieved at a reasonable cost varies significantly by country. While top performers illustrate successful and efficient use of resources, the variation across countries signals an opportunity for tailored policy measures to support lower-performing regions.

To gain more insight into the success of different groups of countries above, we analysed the **list of implemented projects** based on the keywords the Member States used to describe the projects. ([277]) The aim was to assess the investment priorities within the different groups of countries above, by considering the level of EU contribution.

The following insights must be treated with caution, as a high share of the projects in the database had no keyword associated, while for the others the keyword associations have not always been used consistently across the Member States. To address the issue of missing keyword associations, we removed from the analysis the share of projects with no keywords associated. For the remaining projects (covering 86% of the total EU contribution), we reviewed the project titles and descriptions to ensure an accurate categorisation.

Additionally, we focused on allocations as a proxy for financial input due to the unavailability of detailed expenditure data at the project level. While this approach provides an indication of financial commitment, it does not fully reflect actual spending and its efficiency. To enhance the robustness of future analyses, we recommend improving data collection to ensure more comprehensive and consistent reporting of both allocations and expenditures.

As shown in the table below, **top performers under SO1** focused more on projects to support the visa application process, such as development of information systems for coordination visa applications, equipment/software for the extraction of information and consular cooperation. Both categories of countries concentrated their efforts for the operations related to Visa information system (VIS). Less performing countries concentrated their efforts also on consulate construction / renovation / equipment and IT systems/interoperability of information systems.

(277) Based on the dataset provided by the EC Execution of Accounts Generic Board Cumulative, extracted at 15.03.2024.

Table 9 - Investment priorities within top, mid-tier, and low performers, based on the efficiency score ranking (SO1)

Associated keywords	% of EU contribution out of the total EU contribution to SO1		
	Top performers (a)	Mid-tier and low performers (b)	Differences (a) - (b)
Visa information system (VIS)	20%	40%	-20%
Training in the common visa policy	3%	3%	0%
Support for visa application processing	34%	4%	30%
Schengen Information System (SIS) - general	9%	12%	-3%
IT systems/interoperability of information systems	6%	11%	-5%
Information exchange	1%	0%	0%
Immigration liaison officers (ILO)	0%	0%	0%
Equipment/software for the extraction of information	11%	4%	7%
Entry - Exit System (EES)	0%	1%	-1%
Document security/document advisors	3%	3%	0%
Consulate construction / renovation / equipment	0%	12%	-12%
Consular cooperation	9%	4%	5%
Consular coverage	1%	2%	-1%
Construction / Renovation / Acquisition of equipment BCPs	1%	1%	0%
Training for consular officials	1	0	1
UNKNOWN	0%	1%	-1%

Source: Execution_of_Accounts_Generic_Board_Cummulative_15.03.2024

As shown in the table below, **top performers under SO2** focused rather on maritime border surveillance and activities associated with EES (Reg 2017/2226). The development of Integrated Border Management, activities associated with ETIAS Regulation 2018/1240, and initiatives aimed at enhancing the capabilities of immigration liaison officers are also operations of interest for top performers. In contrast, the **less performing groups** focused more resources on Frontex equipment and land border surveillance, followed closely by maritime border surveillance. They also focused on operations related to Entry - Exit System and investments for border checks.

Table 10 - Investment priorities within top, mid-tier, and low performers, based on the efficiency score ranking (SO2)

Associated keywords	% of EU contribution out of the total EU contribution to SO2		
	Top performers (a)	Mid-tier and low performers (b)	Differences (a) - (b)
Trainings (e.g. for Employees of Border Police to Ensure and Uniformly Apply EU Law/ SIS/ VIS, for personnel Deployed in Third Countries for Border Control)	0%	1%	-1%
Support to National Coordination Centre (NCC) - EUROSUR	2%	3%	-1%
SIS Regulation (EU) 2018/1861	2%	1%	1%
Schengen Information System (SIS) - general	2%	3%`	-1%
Schengen Information System – Automated Number Plate Recognition (ANPR)	0%	0%	0%
Schengen Information System - Automatic Fingerprinting Identification System (AFIS)	0%	0%	0%
Maritime border surveillance	29%	12%	17%

Associated keywords	% of EU contribution out of the total EU contribution to SO2		
	Top performers (a)	Mid-tier and low performers (b)	Differences (a) - (b)
Land border surveillance	5%	14%	-9%
IT systems/interoperability of information systems	4%	3%	1%
Information exchange	0%	1%	-1%
Implementation of Schengen evaluation recommendations	0%	0%	0%
Immigration liaison officers (ILO)	6%	0%	6%
ETIAS Regulation 2018/1240	7%	3%	4%
Equipment/software for the extraction of information	0%	1%	-1%
EES (Reg 2017/2226)	18%	11%	7%
EBCGA (FRONTEX) equipment	5%	19%	-14%
Consulate construction / renovation / equipment	0%	0%	0%
Document security/document advisors	1%	1%	0%
Development of Integrated Border management (IBM)	7%	2%	5%
Construction / Renovation / Equipment BCPs	1%	4%	-3%
Border checks (identification, registration, fingerprinting, screening, debriefing, etc.)	3%	6%	-3%
Automated Border Control (ABC) Gates	2%	2%	0%
Air border surveillance	1%	6%	-5%
Victims of trafficking in Human beings	0%	0%	0%
Unmanned aerial vehicles (UAVs)	0%	1%	0%
Hotspot approach	0%	2%	-2%
Further development of SIS/ SIRENE management	0%	1%	-1%
Risk analysis / support to Common Integrated Risk Analysis Model (CIRAM)	0%	0%	0%
External dimension	0%	0%	0%
Unknown	3%	3%	0%

Source: Execution_of_Accounts_Generic_Board_Cummulative_15.03.2024

Considering all the limitations of this analysis, these results should not be used to identify which types of projects are more cost-effective. Instead, they should underline in which areas of intervention Member States (MS) have more difficulties in implementing cost-effective projects. The existence of certain interventions that do not present an optimal cost-effectiveness ratio does not suggest that these interventions were unnecessary; rather, the implementation may have been influenced by the unique circumstances faced by each Member State or could reflect capacity constraints.

8. Our recommendation is, therefore, to support those Member States which seem to exhibit lower performance and efficiency in implementing project management practices, cost control, and risk assessment approaches systematically. This will ensure the optimal implementation of their EU-funded investments.

ANNEX V: STAKEHOLDER CONSULTATION – SYNOPSIS REPORT

1 CONSULTATION STRATEGY

Consultations included a call for evidence, an online survey, EU level interviews, a focus group, an open public consultation and case studies (country and thematic). The objective of the consultations was to collect relevant information and insights on the relevance, effectiveness, efficiency, coherence and complementarity, EU added value, sustainability and simplification of the ISF-BV as well as to collect inputs on lessons learned. To do so, a wide range of EU, international and national level stakeholders were consulted.

1.1 Call for evidence

Prior to the start of the ex post evaluation, in line with the Better Regulation Provisions, a call for evidence was launched in the Have Your Say platform. 3 contributions were received ([278]):

- The Spanish Non-governmental Organisation RED COGE highlighted possible irregularities commited by the Spanish Authorities in the application of the EU legislation within the framework of the EU funds.
- A non-EU citizen from Ukraine stated that the weak European migration system created favourable conditions for the infiltration of spies and terrorists.
- An anonymous individual from Slovakia stated that the situation at the EU borders has been difficult and more uncontrolled as of 2020.

Table 11: Overview of the stakeholders reached through each consultation tool / method

	EU level Interviews	Online surveys	Focus Group	Open public consultation	Validation Workshop (Focus Group 3)	Country case studies	Thematic case studies
European Commission staff	x				x	x	x
Migration and Home Affairs (and other relevant) Agencies	x					x	x
National Authorities		x	x		x	x	x
Participant / (end) beneficiaries		x				x	x
Other SHs (EU bodies, IOs, NGOs, etc.)	x			x		x	x
Expert groups, network, research centres and academics		x	x	x			
Wider public (including non-EU)		x		x			

1.2 Online survey

An online survey was launched to (i) collect information on the relevance, effectiveness, efficiency, coherence and complementarity, EU added value, sustainability and simplification of the ISF-BV, (ii) understand the problems/gaps affecting the functioning

([278]) Internal Security Fund – Borders and Visa (ISF BV) for 2014-2020 – ex post evaluation

and effects of the ISF-BV, as well as (iii) gather suggestions for future-looking recommendations. Three different survey questionnaires were used, targeted respectively at **National Authorities (34 total respondents), other stakeholders involved (28 total respondents) and beneficiaries (35 total respondents)**. The survey ran from June 17, 2024, to September 16, 2024, and it has been administered and centrally managed by the evaluation team by using the Qualtrics tool.

1.3 EU level interviews

Between July and November 2024, the Study team carried out **21 in-depth EU level interviews** aimed to gather relevant information and insights on the relevance, effectiveness, efficiency, coherence and complementarity, EU added value, sustainability and simplification of the ISF-BV. The response rate amounted 60% as 21 out 35 individuals contacted agreed to participate in an interview. Among the 14 negative responses, the vast majority involved individuals redirecting the Study team to a more appropriate contact. Specifically, 2 requests went unanswered, 11 individuals referred the Study team to another interviewee, and 1 individual declined.

Table 12: EU-Level interviews conducted

European Commission staff	
DG HOME's relevant Directorates	
1	Directorate A: International & Horizontal Affairs / Policy Coordination & Interinstitutional Relations (A1)
2	Directorate B: Schengen, Borders & Visas / Schengen & External Borders (B1)
3	Directorate B: Schengen, Borders & Visas / Schengen Governance (B2)
4	Directorate B: Schengen, Borders & Visas / Visa Policy (B4)
5	Directorate E: HOME Affairs Funds / Funds Coordination (E1)
6	Directorate E: HOME Affairs Funds / Union Actions and Procurement (E4)
7	Directorate E: HOME Affairs Funds / Budget & Reporting (E5)
8	Directorate F: Innovation & Audit / Audit & Compliance (F1)
9	Directorate F: Innovation & Audit / Innovation & Security Research (F2)
Others relevant DGs	
10	DG TAXUD / Directorate A: Customs / Customs Policy (A1)
11	DG NEAR / Migration (DGA2.01)
12	DG NEAR / Rule of Law - Western Balkans Policy & Regional Strategy (D1)
13	DG JUST / Coordinator of the Justice programme
14	DG INTPA / Person in charge of NDICI-Global Europe Instrument
15	DG EMPL / ESF+ Coordination Unit in charge of migration theme
Migration and Home Affairs (and other relevant) Agencies	
16	European Border and Coast Guard Agency (Frontex)
EU Body	
17	European External Action Service (EEAS)
International Organisations	
18	International Centre for Migration Policy Development (ICMPD) / Migration Partnership Facility (MPF)
19	UNHCR Brussels
20	UNHCR Liaison Office to Frontex
21	IOM Greece

1.4 Focus Group

The focus group was held in person on June 25, 2024, in Brussels, as part of the Home Affairs Funds Conference. Moderated by the Study Team, this focus group aimed to gather direct input from both ISF-BV and BMVI National Authorities, audit authorities, and beneficiaries, regarding the current and emerging needs in the area of border management and visa policy in their Member State. The discussions focused on mapping current and future needs, evaluating how well these needs have been met, and identifying any gaps in the existing instruments. Twenty-one participants attended the focus group meeting, covering:

- managing authorities and beneficiaries from the following countries: AT, BE, DK, FI, FR, HU, HR, IS, LU, NL, SE, as well as CH, NO and LI.
- two EU agencies: Frontex and EUDA ([279])
- One NGO: ECRE.

1.5 Open public consultation

I. OBJECTIVE OF THE PUBLIC CONSULTATION

The aim of the public consultation was to collect information, expertise and views from interested parties to arrive at an evidence-based and measured judgment of the progress made, with European Union (EU) funding support to the Member States ([280]) and the Schengen Associated Countries (SAC) ([281]), in the following two areas: a common visa policy and the European integrated border and EU external border management.

The public consultation was part of the study supporting the *ex-post* evaluation for the 2014-2020 period of the Instrument for Financial Support for External Borders and Visa (ISF-BV). While the consultation primarily focused on the *ex-post* evaluation of ISF-BV, given the continuity in objectives and interventions, elements related to the 2021-2027 Instrument for Financial Support for Border Management and Visa Policy (BMVI) might also be considered.

II. APPROACH TO THE PUBLIC CONSULTATION

This consultation provided a platform for stakeholders and the citizens to contribute their insights on the ISF-BV instrument aimed at supporting EU Member States and Schengen Associated Countries in addressing the multifaceted challenges related to EU border management and visa policy in the context of its funding.

A questionnaire was developed and made publicly available for a period of 12 weeks. It aimed to gather views from a broad range of stakeholder groups. The following categories available to choose from included: professionals in border management, including in border checks and surveillance of EU external borders, common visa policy, internal security, and representatives of academic/research institutions, business associations, company/businesses (e.g., air/ rail/sea carriers, tour operators, travel agencies, etc.), consumer organisations, environmental organisations, non-governmental organisations (NGO), national authorities responsible for border management (this could include even various national authorities in the EU Member States and/or Schengen Associated Country depending on their national setting of roles/tasks and associated authorities) and of other public authorities.

([279]) Formerly EMCDDA
([280]) All EU Member States, except Ireland
([281]) Iceland, Norway, Switzerland and Lichtenstein

The questionnaire was designed to direct respondents to tailored sub-questions based on their level of involvement or experience with ISF-BV and BMVI. On the one hand, a questionnaire was tailored for respondents:

- Who represented a public body involved in the management, coordination, or supervision of the ISF-BV or the BMVI in their country.
- Who represented a public or private body, an entity with or without legal personality, or a natural person, responsible for initiating and/or implementing operations funded by ISF-BV or BMVI.
- Who were or represented a legal or natural person receiving support from any of the two instruments (ISF-BV, BMVI) through a funded project.
- Who are knowledgeable about ISF-BV or BMVI in their personal or professional capacity.

On the other hand, a shorter questionnaire was tailored for respondents that applied for a Schengen visa or for asylum in the EU and for those who did not belong to none of the categories.

The questionnaire was available in all official EU languages on "*Have your Say*". The consultation period started on 29 August 2024 and ended on 21 November 2024, lasting 12 weeks.

1.6 Validation Workshop (Focus Group 3)

A validation workshop was held on March 28, 2025, with 10 representatives from a sample of national authorities, relevant EC stakeholders as well as from International Organisations (ICMPD), to present the evaluation findings and related conclusions, and to discuss the feasibility of the preliminary recommendations under assessment. The workshop consisted of a plenary session, where the evaluation team presented the objectives of the study and the key evaluation findings, followed by a Q&A section with participants.

1.7 Country and thematic case studies

Eight country case studies were conducted in Croatia, the Czech Republic, Norway, Poland, Spain, Greece, Italy, and Romania. These countries were selected to provide meaningful and representative coverage of ISF-BV interventions across participating countries. Through these country case studies, a total of 74 stakeholders were consulted, including EU stakeholders, responsible authorities, delegated authorities, monitoring committees and beneficiaries.

Table 13: Number and type of stakeholders interviewed per country case study

Stakeholders	Croatia	Czech Republic	Greece	Italy	Norway	Poland	Romania	Spain	**Total (per stakeholder)**
Commission		1	1					1	**3**
Responsible Authority	1	4	1	1	2	2	1	1	**13**
Delegated Authority			1			2	1		**4**
Monitoring Committees		2	1		2				**5**
Beneficiaries	5	2	10	4	6	5	3	14	**49**
Total	**6**	**9**	**14**	**5**	**10**	**9**	**5**	**16**	**74**

Additionally, four thematic case studies were conducted on Emergency Assistance, Specific Actions, Union Actions, the Russian war of aggression against Ukraine. ([282]) 34 stakeholders were interviewed as part of the first four case studies.

Table 14: Number and type of stakeholders consulted per thematic case study

Stakeholders	Emergency Assistance	Specific Actions	Union Actions	Russian war of aggression	**Total (per stakeholder)**
Commission	2		2		**4**
Responsible Authority	3		1	5	**9**
Monitoring Committees	1				**1**
Beneficiaries	4 ([283])	5	9	2	**20**
Total	**10**	**5**	**12**	**7**	**34**

2 RESULTS OF THE CONSULTATION ACTIVITIES

2.1 Online Surveys

Relevance

The ISF-BV instrument was widely recognised for its **relevance** and **adaptability** by national authorities, stakeholders, and beneficiaries. Most national authorities (10 out of 13) reported conducting needs assessments before drafting their national programmes, and 8 did so during implementation. Specific objectives of the programme were highly rated, with most respondents from national authorities considering that both ISF-BV specific objectives were relevant to a "very large" or "large" extent (69% for Specific Objective 1 (11 out of 16 respondents) and 76% for Specific Objective 2 (12 out of 16 respondents). Stakeholders considered that both specific objectives were relevant to a "very large" or "large" extent (50% for Specific Objective 1 (19 out of 38 respondents) and 47% for Specific Objective 2 (18 out of 38 respondents). Most beneficiaries considered that both specific objectives were relevant to a "very large" or "large" extent (60% for Specific Objective 1 (33 out of 55 respondents) and 61% for Specific Objective 2 (34 out of 55 respondents). IT and communication systems emerged as the most critical funded activity, followed by operating equipment, whereas awareness-raising (studies, seminars, workshops and conferences), projects in third countries aimed at improving surveillance systems to ensure cooperation with Eurosur, , and actions relating to operational cooperation between Member States and third countries were rated as less relevant. Despite its relevance, 44% of national authorities identified unmet needs.

There was a mixed feedback about the flexibility of the ISF-BV with over two third of beneficiaries across both categories considering ISF-BV to be flexible to at lease some extent with a large share of respondents considering the Instrument to be flexible to a "very large" or "large" extent. However, only 31% of national authorities and 28% of other stakeholders (11 out of 40) considered that the fund was flexible to a very large or large extent, while 18% (7 out of 40) of other stakeholders considered that fund was not flexible or were flexible to a limited extent.

Effectiveness

([282]) The fifth thematic case study on horizontal priorities were conducted just in relation to BMVI.
([283]) Several of the project coordinators/beneficiaries were responsible for multiple projects.

Interventions funded through ISF-BV's National Programmes have generally contributed positively to operational objectives related to visa and border management across various stakeholders. National authorities largely acknowledged the support's effectiveness, with 62% of respondents confirming its positive impact, especially in areas such as IT systems, border surveillance, and cooperation on immigration management. However, uncertainty was present in some cases, with a portion of respondents unsure about the extent of the support. Other competent authorities also reported favorable outcomes, with 83% recognising the interventions' effectiveness in managing visa and border responsibilities. Other stakeholders shared a similar view, with 79% acknowledging significant contributions to border security, visa policy development, and inter-agency collaboration. Beneficiaries, while generally positive, had a higher proportion of uncertain responses, reflecting the complexity or indirect nature of the interventions.

Efficiency

The efficiency of ISF-BV operations reveals a mixed but generally positive perception among stakeholders. National authorities reported the highest cost-efficiency for National Programmes, with 79% considering the effects achieved at a reasonable cost. However, components like Specific Actions, Union Actions, and EMAS faced greater uncertainty, with a large portion of respondents unsure about their cost-effectiveness. Regarding the efficient management of the ISF-BV's National Programmes, IT and communications systems were deemed the most appropriate by 82% of respondents, followed by infrastructure building and operating systems. Nevertheless, a considerable share of respondents expressed uncertainty, particularly about available training and infrastructure. When assessing burdens, procurement procedures and monitoring requirements were identified as the most burdensome, with over 70% finding them challenging. Beneficiaries also reported positive results in line with planned targets and milestones, with 77% acknowledging reasonable cost-effectiveness. Despite these positive findings, beneficiaries noted regulatory requirements, procurement procedures, and information obligations as burdensome elements. Awareness of fraud detection and prevention mechanisms varied, with a significant number of beneficiaries expressing uncertainty.

Coherence and complementarity

Although 43% of the respondents to the national authorities survey did not provide a response, the internal coherence of the ISF-BV was positively assessed by those national authorities who gave a rating (14 respondents), with no respondents indicating that ISF-BV is "not coherent at all". The majority of responses confirmed that the fund's structure supports complementarities and synergies. Among "other stakeholders", over half of responses confirm the fund's structure supports complementarity either to a very large extent or large extent (i.e. 52-64%) ([284]). More respondents chose "To a very large extent" for Specific Actions (29%, 8 out of 28) than for Union Actions (14%, 4 out of 28).

In terms of coordination mechanisms to ensure the external coherence of the ISF-BV, institutional arrangements, specific directorates, divisions, units, platforms, and committees, were reported by 36% of respondents to the national authorities survey, while 43% cited monitoring mechanisms to prevent overlap of financial instruments. Moreover, 36% of national authorities conducted assessments to identify complementary funding instruments, half of the respondents were unsure or did not answer.

Respondents were most positive about coherence with other Home Affairs Funds ,with 43% answering to a large or very large extent in relation to the AMIF and 36% in relation

(284) 64% (or 14 out of 22) confirmed the existence of different funding mechanisms supported complementarity and synergies to a very large or large extent. 52 (or 11 out of 21) confirm the contribution of different management modes supported complementarity and synergies to a very large or large extent.

to ISF-Police respectively. Coherence with Horizon 2020 and the European Structural and Investment Funds (ESF and ERDF) was also confirmed. Although most “other stakeholders” did not provide an answer, among those who did, ISF-Police received the most positive responses, with 32% (9 out of 28) indicating coherence to a "very large extent" and 36% (10 out of 28) to "large extent, followed by AMIF, with 25% (7 out of 28) indicating coherence to a "very large extent" and also 25% (7 out of 28) to "large extent". Beyond the Home Affairs Funds, respondents were most positive about the coherence between ISF-BV with ESIF (e.g. ESF and ERDF) and Horizon 2020. Similarly to the above, most beneficiaries did not provide an answer to the question whether the actions implemented through the ISF-BV were coherent with other EU interventions that have similar or complementary objectives (54% to 89% depending on the other EU fund listed). Among those who did answer, respondents were most positive about the Home Affairs Funds: 37% (13 out of 35) indicating coherence to a "very large" or "large extent." With ISF-Police, and 28% (9 out of 35) for AMIF respectively

EU Added Value

The surveys indicate a generally positive perception of the EU added value of the ISF-BV across various domains among National Authorities and stakeholders. A significant number of respondents recognised the Instrument’s contribution to the transfer of ideas, the roll-out of innovative approaches, improvements in governance, and enhanced collaboration among stakeholders, with many indicating that these benefits were substantial. Notably, while some authorities reported specific impacts on national policies, such as adaptations to align with EU frameworks, many others did not observe any significant effects. Positive outcomes attributed to ISF-BV projects included advancements in border management technology, improved working conditions for personnel, and strengthened partnerships among stakeholders. However, a considerable portion of respondents also expressed uncertainty or a lack of awareness regarding the Instrument’s broader impacts. Overall, while the ISF-BV is acknowledged for its contributions to various areas, the recognition of its effects on national policies and additional positive outcomes varies significantly among Member States.

Sustainability

Sustainability of ISF-BV’s outcomes reveal a mixed but generally positive outlook across stakeholders. National authorities reported varying levels of engagement in ensuring sustainability, with 21% confirming the adoption of comprehensive measures, while 53% expressed uncertainty. Regarding the effectiveness of sustainability measures, 15% considered them highly effective, while 35% deemed them effective to a large extent. Other stakeholders also showed positive assessments, with 78% viewing sustainability measures as sound or adequate, although 43% expressed uncertainty. Among beneficiaries, 23% confirmed the implementation of comprehensive measures, while a significant 46% were uncertain or not involved in sustainability planning. Overall, beneficiaries largely viewed the measures positively, with 46% expressing confidence in their effectiveness. Despite the overall positive perception, significant uncertainty remains, particularly regarding the mechanisms in place to ensure long-term continuity.

Simplification and reduction of administrative burden

Simplification and reduction of administrative burden reveal a generally limited utilisation across stakeholders. Only 17% of National Authorities reported the use of simplification measures (e.g., SCOs) and a significant portion also felt the time and complexity were disproportionate to their responsibilities, with 56% stating the time required was excessive. Other stakeholders shared similar sentiments: while 18% (n=5) and 21% (n=6) considered the time spent and complexity to be proportionate to their role and responsibilities, a significant share - 50% (n=14) for both factors - felt that obligations required more time

than justified. Finally, also a significant share of Beneficiaries - 40% (n=14) for complexity and 37% (n=13) for time spent - felt that obligations required more time than justified.

2.2 EU level interviews

Relevance

The feedback collected from the EU-level interviews on the relevance of ISF-BV was limited, as most of the stakeholders consulted were only able to provide assessment of BMVI, but not ISF-BV. **Frontex** noted that under ISF-BV, needs assessments were not based on a forward-looking methodology but rather on past historical trends to plan for the coming years. This meant that Member States' national programmes did not sufficiently capture and plan for how the rapidly changing context of border management may evolve and impact their longer-term needs.

Effectiveness

The effectiveness of ISF-BV was positively assessed by key stakeholders, though areas for improvement were highlighted. **DG HOME** highlighted examples of specific achievements under ISF-BV, such as the use of funds to upgrade their vehicles with automatic license plate recognition systems, allowing for quick and efficient checks without needing to stop vehicles, making surveillance at cross-border areas much easier and ensures that potential threats flagged in systems like the Schengen Information System (SIS) or national databases are identified. DG HOME interviewees also noted some challenges, such as the COVID-19 pandemic that constrained certain funded activities, or the continued perception among Member States that the use of ISF-BV was administratively complex. Other more specific challenges mentioned included the long waiting times for visa application appointments for third country nationals, due to a lack of consular staff, despite the availability of European funds to finance these positions. Other DGs interviewed could not comment on ISF-BV either because their position had only started as the ISF-BV programming period came to an end, or because their role focused narrowly on ensuring synergies between ISF-BV and another EU fund, and did not feel they were in a position to assess its effectiveness. International organisations like the **ICMPD** and **IOM** also reported positive impacts, including improved compliance with fundamental rights and enhanced reception facilities. Interviews also noted the importance of peer-to-peer relationships and the ability to maintain functional operations despite higher-level political issues.

Efficiency

The feedback collected from the EU-level interviews on the relevance of ISF-BV was limited, however, according to **DG HOME**, efficiency could be further enhanced by better integrating all funding streams. Furthermore, regarding the level of cost-effectiveness of Union Actions, it was emphasized that cost-effectiveness is a critical assessment element of the proposals, which are not funded unless they are deemed cost-effective. This aspect is scrutinised during the proposal evaluation to ensure that projects deliver results within a reasonable cost. As for **Frontex**, the agency noted that synergies and cooperation were ensured through consultations during the development of national programmes and specific actions. This collaborative approach enhances the cost-effectiveness of the Instrument.

Coherence and complementarity

EU-level interviews with DG HOME officials confirmed the **internal coherence** of the ISF-BV, including the complementary nature of the different funding modalities following their legal base, the internal mechanisms within DG HOME (e.g. the coordination unit) to secure internal coherence, as well as the potential to further exploit synergies where

possible. For example, to build successful investments in Union Actions into national plans (either funded by the EU or funded nationally).

In terms of the **external coherence**, EU level interviews confirmed that mechanisms are in place to ensure coordination between ISF-BV and other EU funding instruments, both at EU and national level. EU level interviewees noted that had not been aware of any overlaps between ISF-BV and other EU funding instruments.

The interviewees noted that ISF-BV had limited overlaps in scope with the ESF and ERDF, or the Justice Programme. In terms of the coherence of ISF-BV and EU funding in relation to third countries, such as NDICI Europe and IPAII, some interviewees noted only a limited number of proposals under ISF-BV related to third countries. Some EU level stakeholders noted that the broad nature of the National Programmes (lack of details on planned activities and in relation to which third countries at planning stage) made it hard know whether and what exactly was being funded in relation to third countries under ISF-BV. However, at the same time, it was noted that coordination with DG HOME had become much closer and more institutionalised since the migration crisis of 2015.

ISF-BV funding was seen by several interviewees as a crucial tool to ensure the concepts developed under Horizon would lead to longer term testing and validation and eventually ensure these capabilities were available to procure on the EU market. However, interviewees also confirmed that Responsible Authorities are often unaware of the relevant R&D projects funded in their country, as well as the relevant stakeholders involved, and that generally follow up to Horizon 2020 was not prioritised by Member States under ISF-BV as they tended to focus on using funding to address more immediate needs.

In terms of **complementarity**, the EU-level interviews did not provide any relevant evidence.

EU Added Value

The interviews highlighted the ISF-BV's added value in enhancing Member States' capabilities and fostering cooperation through targeted financial support. Without EU funding, Member States would have faced severe limitations in their actions due to financial constraints, hindering necessary investments in resources like vessels and helicopters for joint operations. This financial backing not only strengthens overall EU security but also allows the Commission to guide investments effectively, ensuring higher added value while respecting shared competencies. Additionally, instruments beyond National Programmes, such as the Union Actions, can achieve outcomes that national authorities might overlook due to cost considerations, benefiting a broader range of stakeholders, including NGOs and private sector entities. These initiatives well exemplify how EU funds can facilitate transnational efforts, paving the way for cohesive policies, such as a unified visa system across the EU, thereby demonstrating the importance of collaborative action for common objectives.

Sustainability

In terms of **sustainability**, the EU-level interviews did not provide any relevant evidence, apart from a recognition from DG HOME that – while funding has undoubtedly had a sustainable impact – ongoing investment is essential to maintain and enhance border management capabilities.

Simplification

The interviews emphasised the need for a stronger commitment to simplified cost options to enhance efficiency and reduce administrative burdens. While the legal framework for simplification is robust, there is a lack of action to fully implement these options, which could streamline processes. Additionally, centralising procurement through the European

Commission could create economies of scale, benefiting Member States by reducing individual procurement efforts. Furthermore, the underutilisation of European funds (in particular, for consular staff) highlights a significant issue, as personnel expenditures deter some Member States despite the availability of 100% financing. The complexity of administrative processes is frequently cited as a barrier, indicating a critical area for improvement to maximise the effective use of available resources.

2.3 Focus Group

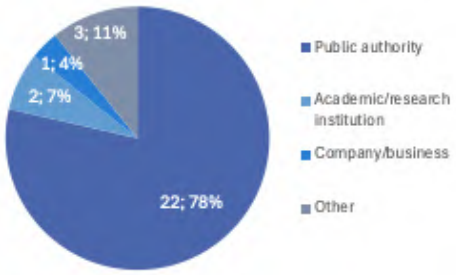
In terms of **current needs**, participants cited specific external events, e.g. 2015 migration crisis, Russian war of aggression against Ukraine as drivers for increased need / pressures for border management against a backdrop of stretched capacity. IT systems featured heavily in the discussion of needs, there was mention of the need for innovation to allow for secure and smooth border process and efficiency, for development and maintenance of "big IT systems" / "large scale IT systems", and "enhanced security" as per the Smart Borders Package. In terms of **new/emerging needs**, participants highlighted a continued need for increased border surveillance in the context of the Russian war of aggression against Ukraine, the new mandatory border procedures stemming from the EU Asylum and Migration Pact, increased needs in the field of implementation of large-scale IT systems, data management and AI, and the new EU rules to digitalise the visa procedure that would need to be implemented by 2031. In terms of the **relevance of types of activities** that could be funded under the BMVI, participants generally thought these were relevant, but noted a few examples of items they would have liked to see funded but were not possible under the current fund (or were not funded enough): Participants were generally positive about the **flexibility of the fund**,. Finally, some participants noted the need for better coordination on the EU funding across the different EU funds and agencies (e.g. Frontex).

2.4 Responses to the open public consultation

2.4.1 Respondent profile

In total, 28 stakeholders participated in the consultation. Most of them were public authorities (78%, 22 out of 28 respondents) ([285]). 11% of respondents (2 out of 28) did not fit into the predefined categories and identified themselves as "others". Finally, 7% (2 respondents) were from academic/research institutions, and 4% (1 respondent) were from companies/businesses. Therefore, business associations, consumer organisations, EU citizens, environmental organisations, non-EU citizens, non-governmental organisations (NGO), and trade unions did not participate in the public consultation.

Figure 27: Respondents by Type of Stakeholders



([285]) The percentages in the report are based on a total of 28 respondents (corresponding to 100% of the total response rate).

Specifically, given the structure of the consultation tailoring questions based on the respondent's situation regarding EU funding for ISF-BV and BMVI and the similar type of stakeholders, most respondents answered the same questionnaire (98%, 26 respondents). They either represent a public body involved in the management, coordination, or supervision of the ISF-BV or the BMVI in their Member State (36%, 10 respondents); a public or private body, an entity with or without legal personality, or a natural person responsible for initiating and/or implementing operations funded by ISF-BV or BMVI (29%, 8 respondents); represent a legal or natural person receiving support from either of the two instruments (ISF-BV, BMVI) through a project (21%, 6 respondents); or are knowledgeable about ISF-BV or BMVI in their personal or professional capacity (7%, 2 respondents). Conversely, 7% (2 respondents) of respondents answered the other tailored questionnaire, declaring that they did not belong to any of the proposed categories.

The respondents come from 13 different countries, including 12 from the European Union and one Schengen Associated Country: 21% (6 respondents) were from Switzerland (the only SAC represented), followed by Hungary (18%, 5 respondents))., Bulgaria (14%, 4 respondents), Portugal (11%, 3 respondents), and Romania (7%, 2 respondents). Finally, 4% came from Malta, Latvia, Greece, Finland, Spain, the Czech Republic, Belgium, and Italy (1 respondent from each country).

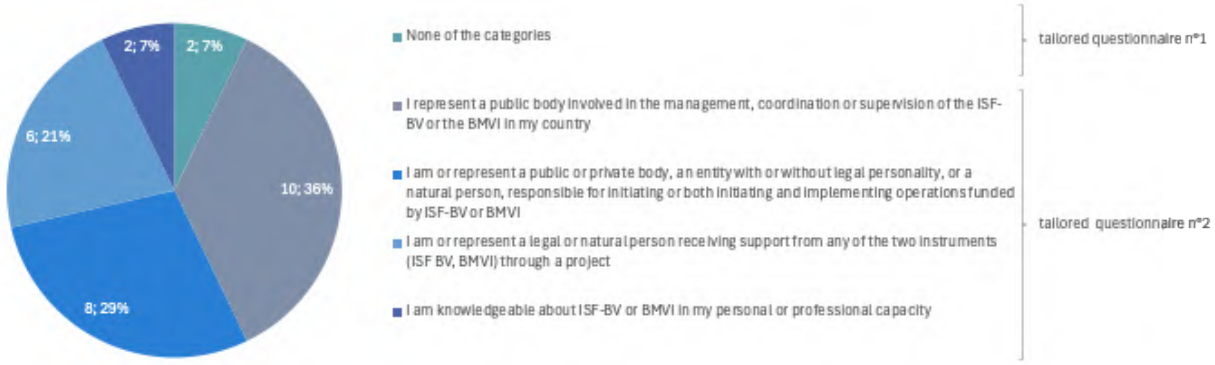
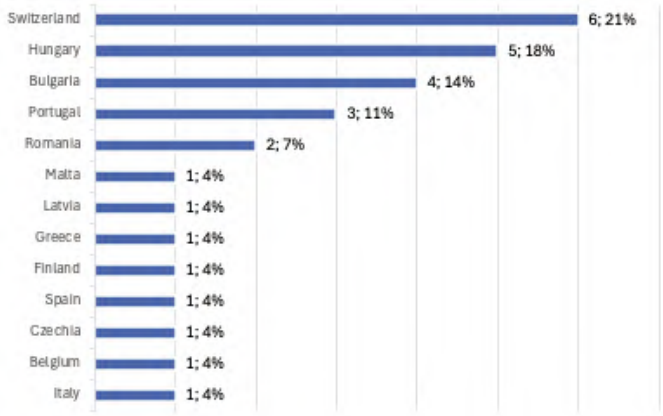
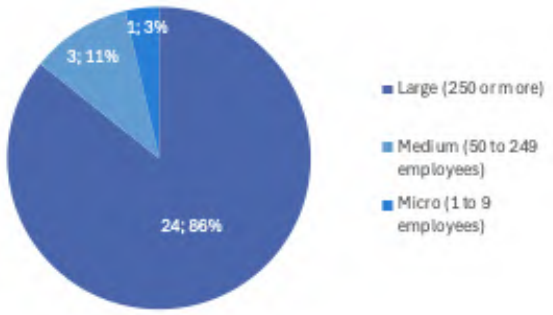


Figure 28: Respondents by Countries



The respondents predominantly come from large organisations (>250 employees), with 86% of respondents reporting they work in this type of organisation. Only 11% of respondents and 3% of respondents belong to medium-sized organisations (50 to 249 employees) and micro-organisations, respectively.

Figure 29: Respondents by organisation size



2.4.2 Substantial findings

Questionnaire 1

The limited number of respondents (2 out of 28) to the tailored questionnaire 1 does not allow to formulate significant conclusions. Nevertheless, it is observed that the respondents agree on the main issues that the EU faces today in managing external borders and ensuring a smooth visa policy, namely the inadequate visa procedures and the inadequate short stay/Schengen visa procedures. Conversely, they consider irregular immigration flows to be the least priority issue.

Regarding the top priority for the contribution of EU funding to the management of the EU external borders, the two respondents have disparate views: one prioritizes ensuring secure and state-of-the-art travel documents for EU citizens and residents, as well as increased cooperation at national and EU levels to swiftly adapt to changing situations and challenges at EU external borders; the other prioritizes ensuring the fundamental rights of third-country nationals when subject to border management procedures.

Similarly, for the top priority for EU funding for the common visa policy, one respondent prioritises the enhancement of security, the management of migratory pressures, and the fight against illegal immigration, while the other prioritises the facilitation of legal immigration.

Questionnaire 2

Questionnaire 2 gathers responses from 98% of the respondents. The respondents have a generally positive opinion of the ISF-BV. 54% (14 respondents believe) the ISF-BV effectively contributed to enhancing the management and security of EU external borders. The remaining 46% (12 respondents) "*somewhat agree*" with this statement. No respondents disagreed with this statement.

Regarding the most effective actions or areas of intervention for the management of EU external borders funded with EU support, the respondents highlighted several key areas of effectiveness. The development and implementation of large-scale IT systems, such as the Entry/Exit System (EES), the European Travel Information and Authorization System (ETIAS), and Interoperability (IOP), are considered highly effective. Additionally, the enhancement of the Visa Information System (VIS), expected by 2026, is anticipated to improve visa application management, ensure timely data exchange between Member

States, reinforce security checks, and facilitate legitimate travel. The acquisition of equipment for border crossings, including automated systems and Automated Border Control (ABC) gates, as well as the improvement of border control and security at border posts through the implementation and maintenance of information systems to combat cross-border trafficking, are also noted as effective interventions. Furthermore, support for the training and advanced surveillance technologies to strengthen the EU's capacity to monitor and protect its borders, along with increasing the preparedness level of human resources through support for border police training systems, are highlighted. The deployment of liaison officers, such as Airline Liaison Officers (ALOs) and Document Advisors in third countries, is also recognized as a significant contribution. Lastly, assistance in the control of air borders, particularly concerning third-country nationals (TCNs), is mentioned as an effective area of intervention.

The respondents also have a positive view of the overall impact of the ISF-BV on the EU integrated management and on the EU common visa policy: 50% (12 out of 26) and 31% (8 out of 26) consider that the Instrument has a high impact in the respective areas, and 42% (11 out of 26) and 34% (9 out of 26) find that the Instrument has some impact. Only two respondents in total expressed a limited negative opinion (low impact).

Ad hoc contribution to the public consultation

A public authority took the consultation procedure as an opportunity to issue its positive opinion about the ISF-BV in an *ad hoc* contribution. This public authority used ISF-BV for the procurement of document verification devices. The newly acquired document checking devices made a significant contribution to carrying out border controls more efficiently and quickly, the authority declared. More specifically, the respondent declared that 'the ISF-BV played *'an indispensable role'* in supporting and strengthening anti-police policies of the public authority, through targeted funding and promotion of projects and initiatives aimed at improving security infrastructure.

2.5 Validation Workshop (Focus Group 3)

Effectiveness

The Commission's efforts to enhance consular cooperation through Specific Actions were largely unsuccessful, with only four out of eleven projects achieving success. This raises the need for a review of the necessity to expand consular coverage, as other mechanisms may already be addressing existing gaps. Additionally, the funding's primary focus is on external border control rather than the internal dynamics between member states. Clarification is needed regarding the absence of internal border control mentioned in the discussions, emphasising the importance of enhancing external capabilities. In terms of the Entry-Exit System (EES), delays in projects are primarily attributed to external factors rather than issues with the funding structure. Future assessments should highlight the achievements made in systems like Eurodac and SIS, acknowledging that significant progress has been made despite some preparatory projects remaining incomplete. Lastly, the notion of ABC gates as innovative tools is misleading; real innovation should focus on advanced technology and collaborative procurement among member states, rather than merely developing basic tools.

Efficiency and Simplification

At the EU level, established mechanisms (OLAF) exist for corroborating information from member states regarding payment requests, and it is advisable to refine the conclusions drawn from these processes. Numerous initiatives are in place to raise awareness and provide training on anti-fraud measures, with national audit authorities playing a crucial

role in identifying irregularities, particularly in staff costs and public procurement. Reports should concentrate on specific issues related to border management and visa policy, as challenges often arise from expenditures occurring outside EU territory in consular offices. Furthermore, there is a pressing need to assist member states in streamlining procurement processes, as auditors often emphasize the burdensome nature of open competitive procedures. Finding ways to justify alternative, faster procedures is essential to alleviate pressure on managing authorities. Fostering a community of practice among member states could facilitate the sharing of best practices in procurement, thereby reducing unnecessary administrative burdens associated with tendering procedures. It is also important to note that procurement remains a high-risk area, necessitating stringent control over procurement processes.

Coherence and Complementarity

Establishing a clear connection between transnational projects and their national counterparts poses significant challenges. While efforts are being made to increase awareness among managing authorities regarding certain EU actions, effectively bridging this gap remains complex and requires further attention.

EU Added Value

When considering transnational projects, it is essential to focus on developing common methodologies rather than merely funding individual member state activities, as each state is responsible for its own systems. Enhancing existing networks and activities where member states can share best practices and address funding challenges would be more beneficial than pursuing additional transnational projects. While there are already mechanisms in place for consultation with NGOs and civil society in border management, the real added value lies in fostering closer cooperation among member state authorities to share best practices and improve effectiveness, rather than increasing NGO involvement in practical information sharing.

Relevance

Participants did not share any views regarding relevance.

Sustainability

Sustainability conclusions should emphasize the need for flexible technical assistance that is consistently available. Long-term planning in border control requires the Instrument for Financial Support, which is crucial for the continuation of previously purchased equipment and investments. Integrating flexibility into previous conclusions would strengthen the overall message.

2.6 Country Case Studies

Effectiveness

The implementation of the ISF-BV instrument across various Member States has generally been effective, with significant achievements in enhancing border management and visa processing capabilities. Most countries successfully met their specific objectives, particularly in strengthening external borders, improving visa issuing procedures, and upgrading IT systems to facilitate a common visa policy. Despite facing challenges such as delays due to the COVID-19 pandemic, natural disasters, and geopolitical events, stakeholders reported that the funding contributed to substantial modernisation efforts, including the procurement of advanced surveillance equipment and the establishment of efficient operational frameworks. While some Member States experienced difficulties in project execution and administrative processes, the overall perception of ISF-BV is positive, with beneficiaries highlighting its critical role in addressing both immediate and long-term needs related to border security and visa management. However, common

concerns included issues with pre-financing and the need for improved mechanisms to streamline project implementation and reporting.

Efficiency

The efficiency of the ISF-BV instrument across various Member States has generally been assessed positively, with significant achievements in utilising allocated funds effectively. Most countries reported high rates of fund utilisation, with many successfully completing projects that enhanced border management and visa processing capabilities. Stakeholders highlighted the cost-efficiency of projects, attributing this to robust public procurement procedures and proactive support from responsible authorities, which helped navigate complex administrative processes. While some challenges were noted, such as delays due to external factors like the COVID-19 pandemic and the need for additional budget allocations for certain strategic projects, the overall management and control systems were deemed effective in ensuring transparency and accountability. The flexibility of the ISF-BV mechanism allowed Member States to prioritise pressing needs, particularly in border management, while Emergency Assistance funds were utilised efficiently to address immediate operational challenges. Despite some bureaucratic hurdles and the complexity of procurement procedures, the implementation of ISF-BV has led to significant improvements in border security and visa operations, demonstrating a strong alignment with the objectives of the Instrument.

Coherence and complementarity

The majority of countries confirmed that the ISF-BV was coherent with other programmes funded by EU sources. This coherence was achieved by different coordination mechanisms in the examined countries. More than half of the countries opted for an institutional setup to ensure coherence across various projects funded by both the ISF-BV and other European funding sources. In Poland the ISF, BMVI and AMIF were managed by the same Managing Authority and the same Delegated Authority, which also made it possible to merge calls for projects which further facilitated the process and reduced administrative burden. Similarly, in Croatia the ISF-BV Managing Authority held the Managing Authority role for AMIF and all ISF activities too. In Greece the Responsible Authority also oversaw all three instruments (ISF-BV, ISF Police and AMIF). Moreover, a dedicated Policy Dialogue between key stakeholders was also held during the summer of 2013 to define the Greek national strategic guidelines and specific objectives of the national programme and ensure their alignment and complementarity with the government policies and initiatives. This was complemented with a series of bilateral meetings with the competent authorities managing the other programmes and initiatives. In Italy an ad hoc organisational unit was established to ensure the full consistency of actions financed. Additionally, annual programmes allowed this unit to have an overview of where budget was allocated, thus avoiding overlaps.

In Czechia a discussion platform served to approve projects and themes of prepared programs and working groups of officials were established to check for program overlaps. The connection to national policies was monitored by a strategy department, which oversaw the alignment of national and operational programs with the priorities of strategic documents and visions, whether departmental or nationwide. Czechia acknowledged challenges related to complementarity, which stemmed from both internal and external factors. Internally, there is a long-term need to enhance the quality of strategic documents and improve their alignment with specific projects funded by national sources and operational programs. Externally, the impact of COVID-19 further complicated matters, leading to a decline in interest and shifts in priorities within the ministry's senior management.

Spanish stakeholders also noted a high level of internal coherence within ISF-BV and considered that the actions included in the National Programme fully aligned with the European priorities and the directions received from the European Commission. Likewise, a high degree of complementarity between ISF-BV and other funding programmes or instruments, such as ISF-Police and AMIF was noted as well. Norway, as a Schengen Associated Country, did not participate in many other programmes funded by EU resources but stakeholders reported that ISF-BV funding was coherent with national funding.

Overall, the findings indicate that ISF-BV has successfully established coherence internally, as well as with other relevant EU and national initiatives, enhancing its effectiveness and ensuring that resources are utilised efficiently. The ISF-BV design and implementation reflect a commitment to complementing existing strategies and addressing the multifaceted challenges of border management and visa policies across member states.

Relevance

All eight countries assessed ISF-BV as relevant, with three countries (Greece, Croatia and Norway) assessing it very or highly relevant. Greece faced challenges in the development, maintenance, and operationalisation of IT tools and systems for visa and border. Such needs served as evidence of the relevance of ISF-BV. Furthermore, maritime border management was highlighted as a major challenge for Greece at the time, underscoring the need for the ISF-BV instrument to support Greece in addressing these gaps but also mentioning that the actual needs were two to three times greater than what the programme offered. Stakeholders in Spain also confirmed that it would have been very challenging to finance many of their actions exclusively from the national budget. Poland considered ISF-BV quite detailed yet flexible enough to adapt to specific needs. However, Polish stakeholders underlined that the process for project changes for Specific Actions, which required approval from the European Commission, takes too much time and sometimes delayed the use of funds. Nevertheless, Polish stakeholders emphasised the importance of the funding provided within the ISF-BV to address the existing needs in the areas of border management and visa policy in Poland, particularly for the main beneficiary, the Border Guard (whose needs were described as “endless” in the current international situation). Norway's mid-term evaluation confirmed the Instrument's high relevance, particularly in supporting the modernisation of outdated IT systems. Moreover, the program's focus on addressing evolving needs was evident as Norwegian authorities revised the program several times to align with changes in EU information systems (SIS recast, EES, and ETIAS).

Overall, the evaluation findings suggest that the ISF-BV program has effectively identified and addressed the needs of national authorities across various countries. The programme's design and implementation have been guided in the majority of the countries by taking into consideration the beneficiaries’ actual needs in the form of preliminary assessments (Italy), needs assessment and consultation process (Greece), open call approach (Croatia), creation of working groups (the Czech Republic), or built-in mechanisms for revision (Romania). These approaches have allowed the ISF-BV programme to maintain its relevance in addressing the challenges faced by the examined Member States.

EU Added Value

The EU added value of the ISF-BV instrument is widely recognised across Member States, with stakeholders affirming that many projects and initiatives would not have been feasible without this financial support. The funding has enabled significant advancements in border management and visa policy, allowing countries to meet EU standards and enhance their operational capabilities. Beneficiaries noted that the absence of ISF-BV funding would have led to reduced priorities, lower efficiency, and compromised quality in project outcomes, as national resources alone would not suffice to address extensive needs. The

Instrument has facilitated the sharing of information and technology among Member States, contributing to a unified approach to security and migration policy. Additionally, the ISF-BV has been instrumental in developing staff competencies and skills, ensuring that training and project implementation meet high standards. Overall, the funding has acted as a catalyst for essential measures, allowing for better resource allocation, improved infrastructure, and enhanced cooperation, ultimately benefiting both individual Member States and the EU as a whole.

Sustainability

The sustainability of the ISF-BV instrument across Member States is generally viewed positively, with beneficiaries expressing confidence that the results of their projects will have lasting effects. Many projects have been designed with long-term maintenance plans, ensuring that equipment and systems remain functional beyond the funding period. Stakeholders noted that training initiatives contribute significantly to sustainability by enhancing staff competencies, which helps maintain operational effectiveness. While some projects are inherently sustainable due to the nature of the investments in infrastructure and technology, others require ongoing support and resources to adapt to evolving needs. Challenges to sustainability include the reliance on individual knowledge within organisations and the need for strategic planning mechanisms, which are still being developed in some cases. Overall, the commitment to using national resources and the potential for leveraging future EU funding are seen as crucial for ensuring the continued impact of ISF-BV initiatives, with monitoring measures in place to assess the sustainability of funded projects over time.

Simplification and reduction of administrative burden

The simplification and reduction of administrative burden associated with the ISF-BV instrument have been met with mixed responses across Member States. While many beneficiaries appreciate the support provided by Responsible Authorities in project preparation and implementation, challenges remain, particularly in public procurement processes, which are often perceived as complex and burdensome. Beneficiaries have noted that centralised procurement offices can alleviate some administrative tasks, but the lack of online systems for documentation submission can delay processes. Some countries have reported improvements due to new information systems and simplified cost options, which have streamlined reporting and reduced complexity. However, issues such as excessive documentation requirements and rigid administrative procedures persist, leading to frustrations among stakeholders. In certain cases, internal procedures have been identified as contributing to the high administrative burden, rather than the EU requirements themselves. Overall, while there are efforts to simplify processes and enhance communication, significant administrative challenges remain that need to be addressed to improve the efficiency of the ISF-BV implementation.

2.7 Thematic Case Studies

Emergency Assistance

Stakeholders consulted expressed positive views on the flexibility of EMAS in addressing gaps under ISF-BV. It was noted that the EMAS application and approval process was quick, typically taking 2-4 weeks, and was less burdensome compared to national programme requirements, allowing for rapid funding once requested. This efficient process was crucial in crisis situations, where delays could have worsen issues and increased risks. However, first-time applicants for EMAS reported a high administrative burden and suggested extending the reporting period from 3 months to 6 months due to their inexperience with EU funds and the lack of a dedicated management unit.

Interviewees highlighted that EMAS funding was versatile, supporting a wide range of activities necessary for emergency responses, although it did not cover structural investments or long-term actions, which aligned with its intended purpose. The different management modes served complementary objectives: national programmes focused on structural and long-term needs, Union actions addressed transnational needs, while Emergency Actions catered to immediate and specific requirements during emergencies. EMAS thus enhanced the capacity of Member States to respond to unforeseen needs not covered by national programmes or Union Actions, leading to a more comprehensive response to emergencies.

The evaluation of ISF-BV also confirmed the high internal coherence and complementarity between EMAS, national programmes, and Union Actions. EMAS was recognised for its significant role in addressing immediate needs that national programmes could not meet, particularly during crises like the Migration Crisis in Greece. While some stakeholders pointed out instances of misuse of EMAS for longer-term issues, they did not view this as a duplication of efforts, as EMAS actions still supported national programme initiatives. Despite the overall positive assessment, the evaluation identified areas for improvement in maximising synergies between Union Actions and EMAS. It found that some ISF-BV beneficiaries were unaware of other ISF-BV funded actions and viewed coordination as an informal initiative that could be strengthened to prevent potential overlaps.

Specific Actions

The selected Specific Actions assessed for this case study related to consular cooperation (SA 1) and the purchase of Frontex equipment (SA 2) from 2014 to 2021. Their outcomes reveal a landscape of mixed results. SA 1 demonstrated a variety of outcomes, with some projects achieving success, while others faced significant delays or cancellations due to administrative difficulties, security issues, and a lack of partner engagement, as seen in the Schengen houses in Kigali and Khartoum. Despite these challenges, SA 1 aligned with EU priorities by promoting consular cooperation and improving visa processing. Nevertheless, numerous projects struggled with local political and logistical hurdles, which limited their effectiveness. At the same time, while the design of these actions allowed for some flexibility, real-world complexities, such as local regulations and security risks, often constrained their adaptability. In contrast, SA 2 exhibited significant achievements, effectively addressing EU priorities by enhancing border security and supporting Frontex's operational capacity, despite facing procurement difficulties and budget constraints. Both SA 1 and SA 2 generally aligned with the operational needs of Member States, although the degree of alignment varied based on local conditions and implementation challenges. The added value of Specific Actions was evident in SA 1, which provided substantial benefits through collaborative projects that pooled resources among Member States, improving service efficiency and addressing complex challenges that individual countries could not manage alone. Similarly, SA 2 enhanced solidarity in external border protection and interoperability among Member States, significantly contributing to the effectiveness of EU external border management.

Union Actions

National authorities confirmed that Union Actions contributed to a wide range of possible activities, and their achievements varied in line with the specific rationale for a given action. Union Actions were perceived as providing a unique opportunity to finance activities that paved the way for new and better ways of working when they were conceived to develop a specific concept or product and were well implemented. They provided significant EU added value and were more efficient than if all Member States had conducted the activities independently.

However, stakeholders highlighted certain cases where the appetite to deliver activities was low for example due to sensitivities, which led to the Union's Actions not working out in practice. Furthermore, they acknowledged that, in certain instances, innovative projects and good practices were being developed, effectively communicated, and logical next steps were being pursued. However, there was a shared sentiment that additional efforts could be made to ensure that processes to ensure that possible synergies between Union Actions and actions at the national level are exploited in a more systematic manner. Stakeholders also confirmed that the Union Actions examined in the case study effectively demonstrated the complementarity with indirectly managed actions under the Migration Partnership Facility, underscoring the interconnected nature of these funding initiatives.

Union Actions involved a variety of activities aimed at addressing specific needs, particularly in enhancing capacity through training and operational support, such as LATBEL. While these actions have been effectively deployed, challenges such as the Covid pandemic and migration issues have impacted their implementation. Procedural concerns, especially the administrative burden on smaller Member States and perceived financial risks, had some deterring effect on national authorities from participating. Interviews indicated that, despite interest, managing transnational collaboration was deemed to be too complex for some national authorities. The country case studies suggests that Member States often viewed Union Actions as additional work, preferring to focus on their national programmes due to the DG HOME representatives perceived Union Actions as coherent with other funding mechanisms, with no significant overlaps. However, they also indicated that potential synergies may be overlooked since information on Union Actions is not systematically shared with national authorities.

Russian war of aggression

Consultation with national authorities suggested that the ISF-BV was not used to address the challenges faced in border management as a result of the Russian war of aggression against Ukraine. This was due to the fact, that all projects funded by ISF-BV were designed and contracted before the war, and—even after it started—they continued without any changes to the activities. Because of that, all interviewed Responsible Authorities confirmed that the projects implemented by ISF-BV did not have any direct link with the response to the increased number of displaced persons from Ukraine.

However, following the adoption of the Commission’s proposal, the implementation period for the funding available to Member States under the 2014-2020 Home Affairs Funds, including ISF-BV, was extended by one year due to the Russian war of aggression. This allowed for the extension of the duration of ISF-BV funded projects.

According to the stakeholders consulted, the extension of the funding period was very useful. It allowed accommodating some delays in projects, which were related not only to the Russian war of aggression but also to the COVID-19 pandemic (particularly in Poland) or delays in public procurement (particularly in Slovakia). The extension allowed the full implementation of projects. All interviewees confirmed it was beneficial for them and the implemented projects. However, one Responsible Authority noted that it also extended the overlap of the previous and the current funding period, which created an administrative burden for the Authority, which has limited capacity to manage two programmes simultaneously.