



# REPLIES OF THE EUROPEAN COMMISSION

## TO THE EUROPEAN COURT OF AUDITORS' SPECIAL REPORT

### **Integration of third-country nationals in the EU**

Relevant support from the Asylum, Migration and Integration Fund but its impact could not yet be demonstrated.

# Contents

I. THE COMMISSION REPLIES IN BRIEF.....	2
II. COMMISSION REPLIES TO MAIN OBSERVATIONS OF THE ECA.....	3
1. The AMIF's added value in supporting integration measures.....	3
2. AMIF monitoring and reporting system.....	3
III. COMMISSION REPLIES TO THE RECOMMENDATIONS OF THE ECA.....	4
Recommendation 1: Analyse how to identify the financing gaps and streamline the programming of AMIF support for the integration of third-country nationals .....	4
Recommendation 2: Collect, analyse and disseminate best practice on AMIF support for integration measures. ....	4
Recommendation 3: Improve the reliability of project data, and of monitoring and reporting on AMIF support for integration:.....	5
Recommendation 4: Analyse how to improve the reporting framework to enable the assessment of the performance of AMIF support for integration pathways of third-country nationals.....	5

This document presents the replies of the European Commission to observations of a Special Report of the European Court of Auditors, in line with Article 265 of the [Financial Regulation](#) and to be published together with the Special Report.

## I. THE COMMISSION REPLIES IN BRIEF

The 2014-2020 Asylum, Migration and Integration Fund (AMIF) had a funding envelope of EUR 3.14 billion. It aimed to promote the efficient management of migration flows and the implementation, strengthening and development of a common EU approach to asylum and immigration. Its aim was to contribute to the achievement of four specific objectives: 1) asylum, 2) legal migration and integration, 3) return and 4) solidarity. The AMIF set up for the period 2021-2027<sup>1</sup> has a funding envelope of EUR 9.88 billion. It contributes to the achievement of four specific objectives among which the specific objective n°2 to support legal migration to the Member States, in accordance with their economic and social needs, and promoting and contributing to the effective integration and social inclusion of third-country nationals (TCNs). The supporting integration measures are tailored to the needs of TCNs and early integration programmes, focusing on education, language, and other training (such as civic orientation courses and professional guidance) to prepare their active participation in and their acceptance by the receiving society.

The AMIF is one of several EU funds serving integration purposes. It supports measures tailored to the needs of TCNs that are generally implemented in the early stages of the integration process, as well as horizontal measures supporting Member States' capacities in the field of integration. The support provided by the AMIF should therefore be considered against this background.

Interventions towards TCNs with a longer-term impact are financed under the European Social Fund+ (ESF+) and the European Regional Development Fund (ERDF). The ESF+ in particular, supports education, employment, and inclusion measures, especially for the most vulnerable, including TCNs, migrants and people with a migrant background more broadly. The ERDF promotes the socioeconomic integration of people with a migrant background, through investments in infrastructure developments, equipment, and access to services. Integration of TCNs can also be promoted by the Technical Support Instrument and the European Agricultural Fund for Rural Development, in accordance with the respective scope.

It is important to underline that beyond EU funding, national funding plays a fundamental role in many Member States regarding the integration of TCNs, which is consistent with the fact that integration of TCNs remains a national competence, and the EU has a support role.

The Commission notes that the sample selected by the ECA for its report covered four Member States which have a long experience of migrant integration policy and where large national funding programmes complements the AMIF and other EU funding tools, providing large mainstream socio-economic support programmes. The Commission considers that the AMIF plays an important role in developing structural migrant integration policies in Member States that have less experience and means to support migrant integration.

---

<sup>1</sup> Regulation (EU) 2021/1147 of 7 July 2021, establishing the Asylum, Migration and Integration Fund.

## II. COMMISSION REPLIES TO MAIN OBSERVATIONS OF THE ECA

### 1. The AMIF's added value in supporting integration measures.

The AMIF does not aim to cover all stages of the migrant integration process. It is important to take into account, in terms of added value, the specific scope of AMIF measures regarding integration, as per Annex III to the AMIF Regulation. The other available funding sources, in particular national funding, have a larger scope, and are complementary with the AMIF. The Commission notes that in addition to the AMIF, there are other national and EU funds directly related to the integration of TCNs<sup>2</sup>. The comparison of the contribution of the AMIF to that of the other available funding sources allocated by Member States for integration needs to take into account all those sources. Moreover, the Commission believes that some Member States from Central or Eastern Europe are in great need of more migrant integration funding.

According to the interim evaluation report: *'the AMIF proved to be an important instrument in handling the difficult situation, by providing both short-term emergency support to and more long-term capacity building of the asylum, integration, and return. AMIF especially contributed to strengthening Member States reception and processing capacities when confronted with the challenging migration flows. While there has been limited progress so far in the area of legal migration, Member States have made moderate progress in the integration area, including in capacity building. Short-term integration measures have been prioritised over long-term, the results of which are not yet visible as integration is a long-term process'*<sup>3</sup>.

In order to increase the AMIF's added value, the Commission agrees with the need to address administrative complexity, which is an obstacle identified by the Commission and stakeholders<sup>4</sup>. The Commission acknowledges the risk identified by the ECA of the administrative complexity limiting the added value of the AMIF. However, the administrative complexity in shared management is often related to Member States' internal requirements, as they are responsible to run the programmes. With regards to the link made between administrative complexity and minimum threshold on specific objective 2 under AMIF, the Commission notes that the minimum threshold of the AMIF allocated to specific objective 2 has decreased from 20% under 2014-2020 to 15% under 2021-2027. Additionally, the ECA itself notes that the percentage allocated to specific objective 2 is much higher than the minimum required (*"34 % of the resources in the 2021-2027 national programmes"*)<sup>5</sup>.

### 2. AMIF monitoring and reporting system

The Commission welcomes that the ECA found that the Commission reviews the Member States' reporting within a structured reporting system<sup>6</sup>.

The Commission notes that an increase in budget does not necessarily lead to an increase in the number of TCNs supported. The additional budget may also be used to increase the intensity of the support provided to the TCNs, or for capacity building actions amongst authorities and stakeholders in charge of migrant integration. The Commission also notes that the ECA has considered in its

---

<sup>2</sup> See ECA observations 32-34.

<sup>3</sup> COM(2018) 464 final of 12/6/2018- Interim evaluation report AMIF and ISF.

<sup>4</sup> See ECA observations 35-38.

<sup>5</sup> See ECA observation 15.

<sup>6</sup> See ECA observation 79.

analysis one indicator (participants numbers) under specific objective 2<sup>7</sup>. The scope of this indicator is partly different between the two programming periods. In addition, the Commission considers that the long experience on migrant integration of the Member States selected by ECA may have had an impact in this analysis.

The Commission highlights that the ex-post evaluation relevant to the impact of the integration measures taken during the period 2014-2020 through the AMIF is ongoing and the results will be published by June 2025. Integration is one of the dimensions to be considered in terms of effectiveness.

### III. COMMISSION REPLIES TO THE RECOMMENDATIONS OF THE ECA

#### **Recommendation 1: Analyse how to identify the financing gaps and streamline the programming of AMIF support for the integration of third-country nationals**

**The Commission, in cooperation with the member states, within their remits, should analyse how to:**

- a) identify financing gaps and possible synergies between funding sources available for the integration pathways of third-country nationals;**

**(Target implementation date: by end of 2026)**

The Commission **accepts** the recommendation.

- b) streamline the programming of AMIF support for the integration of third-country nationals to address those gaps in a targeted way.**

**(Target implementation date: by end of 2026)**

The Commission **accepts** the recommendation.

#### **Recommendation 2: Collect, analyse and disseminate best practice on AMIF support for integration measures.**

**In cooperation with the member states, the Commission should:**

- collect, analyse and disseminate information both on best practice and on the challenges in tailoring AMIF support for integration of relevant specific groups, as well as on other increasingly important topics in the field of integration.**

**(Target implementation date: by end of 2026)**

---

<sup>7</sup> See ECA observations 83-86.

The Commission **accepts** the recommendation.

- **identify and disseminate best practices for analysing and documenting whether project costs are reasonable, by checking, for example, whether costs are in line with relevant benchmarks or market prices.**

**(Target implementation date: by end of 2026)**

The Commission **accepts** the recommendation.

### **Recommendation 3: Improve the reliability of project data, and of monitoring and reporting on AMIF support for integration:**

**In cooperation with the member states, the Commission should:**

- **further support member states in improving the reliability of reported project data to strengthen overall performance information, e.g. by systematically requiring relevant external parties (such as audit authorities) to check the reported project output indicators and promoting data quality checks (on data completeness, consistency, and plausibility) by external reviewers.**

**(Target implementation date: by end of 2026)**

The Commission **accepts** the recommendation.

- **disseminate examples of good practice for monitoring and evaluating AMIF support for integration both to and within the member states.**

**(Target implementation date: by end of 2026)**

The Commission **accepts** the recommendation.

### **Recommendation 4: Analyse how to improve the reporting framework to enable the assessment of the performance of AMIF support for integration pathways of third-country nationals.**

**The Commission should analyse how to improve the reporting framework so it can obtain relevant data to assess the performance of AMIF interventions on the integration pathways of third country nationals as part of its subsequent evaluation of AMIF implementation.**

**(Target implementation date: by end of 2026)**

The Commission **accepts** the recommendation.

The Commission will analyse different scenarios aiming to improve the reporting framework to assess the performance of AMIF interventions on the integration pathways of TCNs.