

Mid-term evaluation of the Polish Financial Support Instrument Programme for Border Management and Visa Policy under the Integrated Border Management Fund for the period 2021-2027

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List of abbreviations used

Abbreviation	Explanation
BMVI	The Border Management and Visa Instrument
CCEI	Financial support programme for customs control equipment, (<i>Customs Control Equipment Instrument</i>)
COPE	European Projects Service Centre of the Ministry of Interior and Administration
CS	Specific objective
EAV	<i>European</i> added value
ISF	Internal Security Fund
EUROSUR	European Border <i>Surveillance System</i> .
IP	Intermediate Body (COPE)
IZ	Managing Authority (Department of European Funds of the Ministry of Interior and Administration)
IZGW	Instrument for financial support for border management and visa policy
KAS	National Tax Administration
KGP	Police Headquarters
KG SG	Border Guard Headquarters
KIG	National Border Infrastructure
MIAA	Ministry of the Interior and Administration
MFA	Ministry of Foreign Affairs
NMF	Norwegian Financial Mechanism
TCN	Third-country nationals
OSS SG	Border Guard Specialised Training Centre
POSG	Podlaski Division of Border Guard
General Regulation	Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Fair Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and the financial rules for these Funds and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy

RP	Republic of Poland
SG	Border Guard
EU	European Union

Summary

The evaluation shows that the planned scope of interventions responds to the most important challenges and needs of the different IZGW stakeholders. The Fund has been dedicated to priority needs in terms of replacement, modernisation of equipment and IT systems, specialised training and operational costs, and has involved representatives of government institutions and leading institutions responsible for ensuring an adequate level of external border protection. However, given the situation on the eastern border and the need to intensify ongoing border protection and operational activities, the beneficiaries believe that the financial allocation of the fund is insufficient to finance all planned projects.

The analysis of the logic of support indicates that the actions planned within the framework of the ICZM 2021-2027 contribute to the implementation of individual specific objectives set for the Instrument. Actions carried out within the framework of individual specific objectives will help to introduce various organisational or technological changes important from the point of view of European integrated management of external borders and ensuring a high level of internal security within the EU while guaranteeing the free movement of persons within the Union. The analysis of the in-depth interviews shows that the priority according to IZGW beneficiaries is the introduction of activities financed under the Instrument at Poland's borders with Ukraine and Belarus.

New requirements related to the General Regulation introduced by the EU, resulted in the introduction of a new system for monitoring, reporting and evaluation - CST2021 - within the security and migration funds. The biggest identified shortcoming of CST2021 is that it is a system that is not tailored to the Facility's needs, rather it is the Facility that needs to adapt to the technical possibilities that CST2021 offers. However, it is worth bearing in mind that CST2021 is in the early stages of implementation so the good points and shortcomings of its monitoring and evaluation system will also become apparent at a later stage of implementation.

Activities consistent with the intervention implemented through the IZGW are initiatives funded by the Norwegian Financial Mechanism 2014-2021 under the Home Affairs Programme. Among other things, the Programme implemented a project on strengthening border protection by training officers in Border Guard divisions to work independently as instructors-selectors in training service dogs to assist in combating cross-border crime. Taking into account the objectives and envisaged actions, the support provided under the IZGW is also consistent with the funding provided under the IZGW Thematic Instrument, under which Poland received funds for the implementation of specific actions. These projects concern, inter alia, the construction of technical protection of the external EU border on the Polish state border with Belarus and the development of a radio communication system. These activities are complementary to the projects on enhancing border security, implemented from the state budget (construction of electronic state border security at the section of the EU external border) and are a continuation of the project "Extension of technical protection systems of the EU external border in terms of surveillance equipment", implemented under ISF 2014-2020. The FAMI Thematic Instrument also supported the project on improving the procedure for confirming the identity of Central Asian citizens and organising return operations. In addition, the EC also granted Poland additional funds under IZGW emergency assistance to strengthen border infrastructure at the EU

external border. Actions consistent with the IZGW intervention also include the CCEI (Customs Control Equipment Instrument) Financial Support Programme, which is funded by the EC from the Integrated Border Management Fund. The objective of the instrument is to support the customs union and national customs authorities in protecting the financial and economic interests of the EU and Member States. Support from the IZGW is also consistent with border management activities financed from the state budget and implemented under statutory obligation by the Border Guard, the Ministry of Foreign Affairs, consulates, the Office for Foreigners and Provincial Offices.

Introduction

The main objective of the mid-term evaluation was to confirm that the implementation system and the Fund are adequate to meet the objectives and will deliver:

- their achievement at a reasonable cost,
- adequate support to meet changing needs,
- the added value of EU-level intervention, consistent with other sources and modes of funding.

The purpose of conducting the evaluation was to improve the quality of planning and implementation of the Fund. Given the early stage of implementation of the Polish IZGW 2021-2027 Programme, the mid-term evaluation focused on procedural issues, assessing the Fund's continued relevance and improving the implementation process. Nevertheless, the mid-term evaluation was also tasked with preparing the ground for the ex-post evaluation, in particular by checking whether the current monitoring and evaluation arrangements would allow sufficient information to be collected and generated to measure the impact of the programmes up to June 2029 in the context of the preparation of the future Multiannual Financial Framework.

The scope of the evaluation study being carried out is the same as the scope of activities that will be implemented in Poland with the support of IZGW funds. These have been defined in the Polish IZGW Programme. The following specific objectives are listed therein:

- I. *European integrated border management*
- II. *Common visa policy*

The scope of the evaluation covers the activities related to the programming and implementation of the Fund from the beginning of the programming period until December 2023, therefore the study covers data recorded up to 31 December 2023 and reported to the European Commission by 31 January 2024.

The evaluation was based on five evaluation criteria:

A. Relevance	B. Effectiveness	C. Efficiency	D. Coherence	E. EU added value
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These criteria are reflected by adopting a five-part structure for this report presenting the results of the evaluation.

Description of the methodology used

The contractor used a diverse methodological instrumentation in the execution of this contract, including both information gathering and analysis methods:



Source: own work ECORYS Polska sp. z o.o.

The desk research analysis included:

- IZGW policy paper:
 - Polish IZGW Programme 2021-2027;
- Guidelines related to the implementation of the IZGW:
 - Project Beneficiary Handbook under IZGW;
 - Procedures Manual for MA and IB;
- IZGW implementation reports:
 - Annual implementation reports for financial year 2022;
- Documents relating to the area covered by IZGW support:
 - Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing the IZGW;
 - Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and the financial rules for these Funds and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy;
 - Draft Background Note - April 2023, Webinar of 19 April 2023 on the key elements of the mid-term evaluation and evaluation plans Home Affairs Programmes 2021-2027;
- Previous evaluation reports (evaluation of ISF with border component)
- Information on IZGW is available at <https://www.gov.pl/web/dfe-mswia/wdrazane-fundusze-europejskie>;
- Information on IZGW is available at www.copemswia.gov.pl.

Given that the IZGW is currently in the early stages of implementation, this method was the primary source of data analysed and evaluated. Nevertheless, the Research Team also undertook in-depth interviews with the implementers of the IZGW and the entities that constitute the beneficiaries of the Fund. A total of 6 in-depth interviews were conducted as part of the study, including:

- Individual in-depth interviews with staff of institutions involved in the implementation of the IGA, including representatives:
 - Ministry of Interior and Administration (Department of European Funds) - 1 interview;
 - Centre for European Projects Services of the Ministry of Interior and Administration - 1 interview;
- Individual in-depth interviews with staff of organisations that have been beneficiaries of the ISF border component and may be beneficiaries of projects financed from the IZGW:
 - Ministry of Foreign Affairs - 1 interview;
 - Border Guard Headquarters - 1 interview;
 - Podlaskie Voivodship Office - 1 interview;
 - Police Headquarters - 1 interview.

In addition, a qualitative benchmarking exercise was carried out to highlight best practices at the level of both the Fund and the projects it supports.

Reconstructing and describing the intervention logic

The Financial Support Instrument for Border Management and Visa Policy was established by Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021. The Polish IZGW Programme was approved by the EC on 12 December 2022. In the 2014-2020 financial perspective, there was a separate component under the CDF on border protection. Currently, IZGW has become a separate Fund.

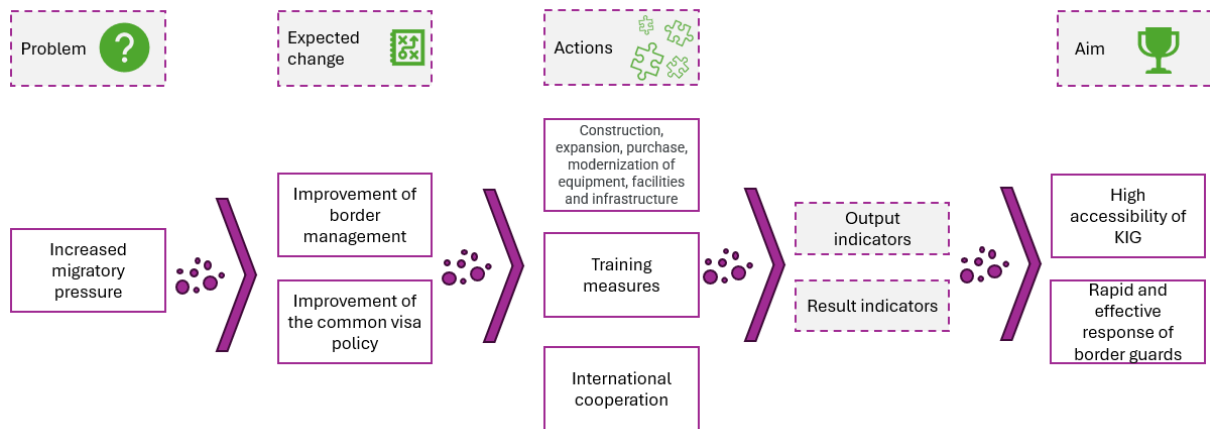
The ICZM includes two specific objectives, which include European integrated border management and a common visa policy. Underlying these objectives are challenges and threats, which are also defined in the Polish ICZM Programme 2021-2027. The basis for their definition was the strategic documents of the Republic of Poland and the multi-annual strategic policy on European External Border Management. In this context, an important challenge is the **increased migration pressure** from southern Europe (via the Balkan route - migrants from African and Middle Eastern countries who reach the southern ends of Europe by sea and then head to other European countries by land) and from across the eastern border (i.e. from the Polish-Ukrainian border, especially after the outbreak of armed conflict in Ukraine on 24.02.2022 and on the Polish-Belarusian border as a result of the actions of the Belarusian regime supporting illegal migration). In addition, the **problem of the green border**, i.e. crossing the state border in unauthorised places, usually in forests or across the river), remains topical.

All of this makes Poland face the need for the following:

- The need for perimeter construction at the EU external border;
- The need to build security at the EU's external water border as well as the Polish maritime border;
- The need to purchase optoelectronics equipment;
- Need to expand/modernize the SG ICT system;
- Developing the training of those responsible for border management;
- Expansion/modernisation of existing border crossings to increase capacity;
- International cooperation to mitigate cross-border threats.

These activities are intended to lead to the goal of high accessibility of the NGA and a rapid and effective response of the SG, adapted to the changing reality and emerging challenges. A diagram of the logic of intervention is presented below.

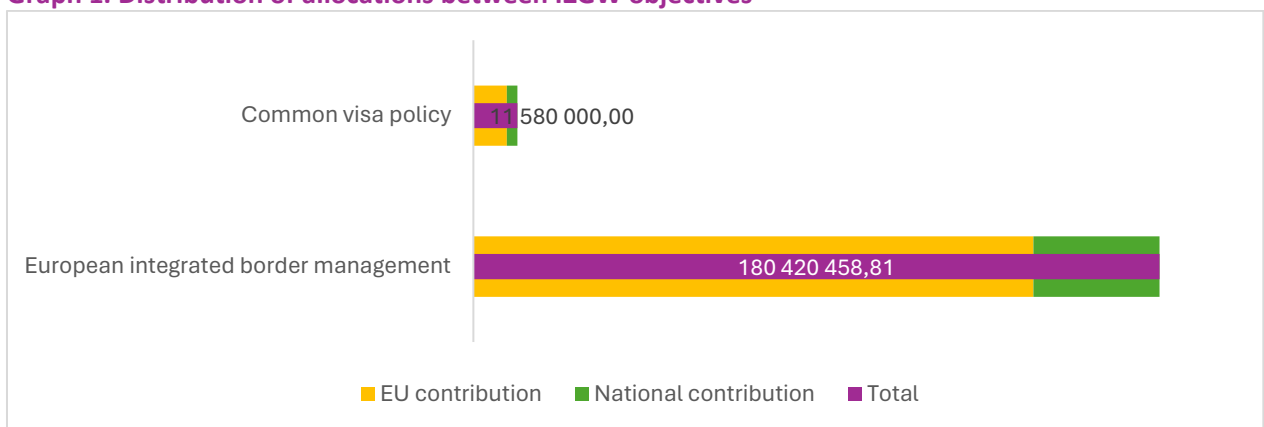
Scheme 1. Logic of intervention



Source: own study.

A total of EUR 201 365 070.72 is planned for the implementation of the actions, of which EUR 165 441 477.10 is the EU contribution and EUR 35 923 593.62 is the national contribution. The majority of these funds (almost 94%) are earmarked for the European Integrated Border Management objective. The remainder of the funding is earmarked for related to the common visa policy¹.

Graph 1. Distribution of allocations between IZGW objectives



Source: own compilation based on IZGW programme document.

The achievement of the set objectives is guided by indicators, which are divided into output indicators and result indicators. Due to the fact that the **first call under the IGA was only announced on 28 July 2023**, it is not reasonable to present the values of the indicators achieved so far. Given the period of preparation of this evaluation, the cognitive value associated with presenting the current status of the implementation of the indicators may be residual - as the activities are only in the initial phase of

¹ Originally, almost 10% of the initial allocation was earmarked for the CSF (requirement under Art. 13.2 of the IZGW Regulation, derogation of 10% under Art. 13.3). The original allocation was EUR 91,083,403, but this was later increased by funds allocated to Poland from specific actions (thematic instrument) - hence the differences.

implementation. Instead, the research team decided to analyse the indicators - both output and result indicators - to examine whether they are adequate in terms of the objectives set for the IZGW.

The Fund selected the following **product indicators**:

Objective 1 European integrated border management:

- Number of pieces of equipment purchased for use at border crossings, including number of automated border control gates / self-service systems / electronic passport gates purchased;
- Number of infrastructure items maintained/repaired;
- Number of hotspot areas supported;
- Number of built/upgraded facilities at border crossings;
- Number of aircraft purchased, including number of unmanned aircraft purchased;
- Number of maritime means of transport purchased;
- Number of land transport assets purchased;
- Number of participants supported, including number of trainees;
- Number of immigration liaison officers seconded to third countries;
- Number of IT functions developed/maintained/upgraded;
- Number of large-scale information systems developed/maintained/upgraded, including number of large-scale information systems developed;
- Number of cooperation projects with third countries;
- Number of persons who applied for international protection at border crossings.

Objective 2 Common visa policy:

- Number of projects facilitating the digitalisation of visa processing;
- Number of participants supported, including number of trainees;
- Number of staff seconded to consulates in third countries, including number of staff seconded to process visa applications;
- Number of IT functions developed/maintained/upgraded;
- Number of large-scale information systems developed/maintained/upgraded, including number of large-scale information systems developed;
- Number of infrastructure items maintained/repaired;
- Number of rented/amortised properties.

In addition, the following **result indicators** were selected in the Fund :

Objective 1 European integrated border management:

- Number of pieces of equipment registered in the technical equipment pool of the European Border and Coast Guard Agency;
- Number of pieces of equipment made available to the European Border and Coast Guard Agency;
- Number of forms of cooperation initiated/improved between national authorities and EUROSUR national coordination centres;
- Number of border crossings through automated border control systems and electronic gates;

- Number of implemented recommendations issued as a result of Schengen acquis and vulnerability assessments in the area of border management;
- Number of trainees who, three months after the training, confirm that they are using the skills and competences acquired during the training;
- Number of persons refused entry by border services.

Objective 2 Common visa policy:

- Number of new/upgraded consulates outside the Schengen area, including number of consulates upgraded to make applying for a visa more applicant-friendly;
- Number of implemented recommendations issued as a result of the evaluation of the application of the Schengen acquis in the area of common visa policy;
- Number of people applying for visas electronically;
- Number of forms of cooperation initiated/improved between Member States in the processing of visa applications;
- Number of trainees who, three months after the training, confirm that they are using the skills and competences acquired during the training;

The analysis carried out confirms that there is a link between the identified actions and the objectives and challenges to which the Fund is to respond. In addition, the identified output indicators are in correlation with the result indicators and follow logically from the actions that are planned in the IZGW. Therefore, it should be assessed that the **intervention logic has been drawn up correctly**.

State of play (progress of implementation of Fund operations from a procedural, financial and real point of view)

The fund is in the early stages of implementation. So far, two calls for proposals have been announced under the IZGW. These took place in the second half of 2023 and were addressed to the Border Guard Headquarters.

In the first call, support of over PLN 292 million was foreseen. The allocation was to finance two work packages from specific actions (thematic instrument):

1. Construction of technical protection of the EU external border in wetlands, coastal areas and rivers along the section of the Polish state border with Belarus - 219 km (to the extent possible);
2. Modernisation of the radio communication system.

Applications were submitted in September and November 2023. The level of funding awarded was 90% of eligible costs.

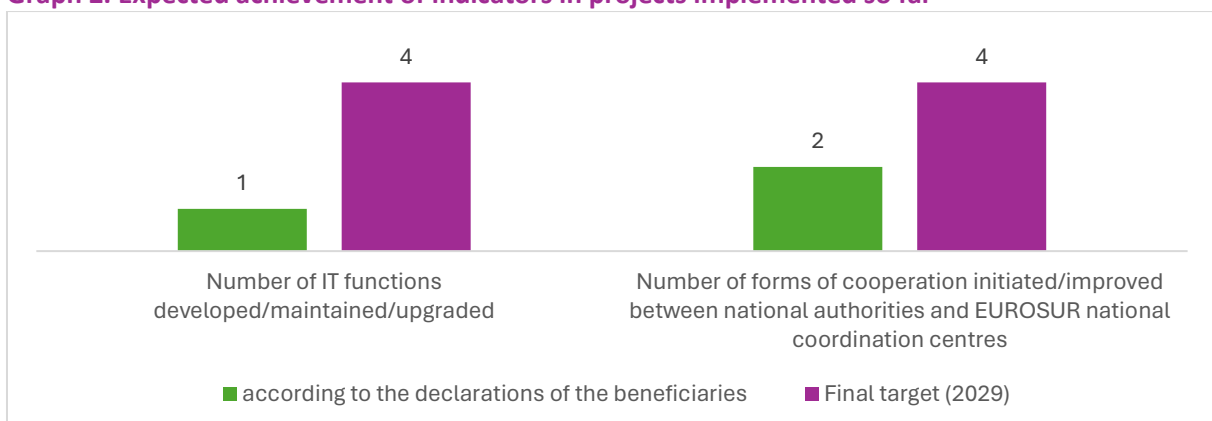
Under the second call for proposals support was provided in the amount of 43 275 000.00 PLN. These funds constituted 75% of the eligible costs of the project, the remaining 25% (14 425 000.00 PLN) was borne by the beneficiary (the costs incurred by the beneficiary, however, came from the state budget). The application was submitted at the end of December 2023 and covered the project entitled 'Construction of technical protection of the EU external border in water areas on the section of the Polish border with Belarus at POSG part II'.

Therefore, at the time of this evaluation, an assessment of the degree to which the indicators have been achieved is not justified, as the projects are still in the implementation phase.

An analysis of the 2024 call schedule under the IZGW indicates that nine calls are planned to be launched, with the available allocation reaching PLN 124.7 million.

On the basis of the project intentions specified in the 3 project applications submitted so far, it can be concluded that they will allow the partial realisation of indicators such as: Number of IT functionalities developed/maintained/updated and Number of initiated/improved forms of cooperation between national authorities and EUROSUR National Coordination Centres.

Graph 2. Expected achievement of indicators in projects implemented so far



Source: own compilation based on funding applications and IZGW programme document.

In accordance with Article 14 of *Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, within the framework of the Integrated Border Management Fund, the Financial Support Instrument for Border Management and Visa Policy*, if by the end of 2024 a Member State manages to confirm a certification of 10%, it will be able to apply for additional funds from the budget reserve. For this reason, it is necessary and reasonable to actively advertise calls for proposals and implement actions that should have been initiated starting from 2021. Indeed, the measures implemented to date are at an early stage. Evaluation is only possible by indicating the intentions of the beneficiaries. However, due to the stage of implementation, the assessment of the degree of achievement of indicators would be illusory and subject to high error. However, it can be pointed out that due to the scale of the projects accepted for implementation so far, the intentions indicated in the IZGW programme document seem impossible to achieve. It is therefore necessary to adopt for implementation and subsidise further projects. All indications suggest that this will be possible in 2024 and there is a willingness on the part of the programme institutions.

Evaluation results according to criteria, questions and specific objectives

A. Suitability

1. To what extent is the Fund responsive to changing needs?

The IZGW Fund is a continuation of the activities carried out in the ISF 2014-2020 in the field of EU external border security as well as visa policy. The scope of IZGW interventions results from the current needs and challenges of ensuring an adequate level of security for Poland and the EU borders. Representatives of government institutions and leading institutions responsible for ensuring an adequate level of security for the country were involved in the process of developing the programme. In addition, the draft IZGW programme was subjected to public consultations, during which all interested parties were able to provide comments and possible observations.

In general, the IZGW programme pursues two specific objectives (CS1): European Integrated Border Management and (CS2): Common Visa Policy, under which activities have been selected to receive funding. The analysis of documents, interviews with IZGW implementers, as well as with representatives of the Fund's main stakeholders shows that the planned scope of interventions responds to the current challenges of individual stakeholders, nevertheless the level of the Fund's co-financing is insufficient in relation to the needs, as since the stage of planning the intervention (4 four years ago) the costs of investments have significantly increased, the geopolitical situation and the situation on Poland's eastern border have changed. The events of recent years related to increased migratory pressure at the Belarusian border section as well as high pressure at the Ukrainian border related to the armed aggression of the Russian Federation towards Ukraine prove that the implementation of the actions selected under the IZGW is a priority issue in order to ensure an adequate level of border security.

The ongoing war will cause numerous threats to both the population and infrastructure of the Republic of Poland, as well as in the context of the security of Europe as a whole. During the individual interviews carried out for the evaluation study, it was pointed out that recently there has been a growing problem of migratory pressure, smuggling of arms and ammunition to other countries by Ukrainian citizens, radar crime. At the same time, a problem that may arise in the near future will be the illegal migration of Russian soldiers, who may fear to return to the country and will try to cross the Polish border.

(...) The political situation requires us to step up the intensity of our work when it comes to digitalising the visa process, for example. That was originally not so widely considered. (...)

Source: individual in-depth interview with IZGW beneficiary.

This problem of drone crime is emerging. We have more and more of these activities, not that hybrid, but also these activities related to flying across our border. (...) Smuggling of some things, mainly these are excise goods, but there may be others in the future. (...) Somewhere this package will fall, these goods will

fall, and what is there we do not know. It is always approached with some caution (...).

Source: individual in-depth interview with IZGW beneficiary.

During in-depth interviews with beneficiaries it was pointed out that it is currently difficult to determine how the situation on Poland's eastern border will evolve. Nevertheless, it is a priority issue for the Polish services to ensure an adequate level of border security, and the IZGW fund contributes to and co-finances the most important challenges in this respect.

2. To what extent can the Fund adapt to changing needs?

The IZGW instrument, in combination with FAMI and ISF, supports national authorities in ensuring an adequate level of internal as well as external security. In general, the IZGW has been dedicated to priority needs for replacement, upgrading of equipment and IT systems, specialised training and operational costs. The programme's provisions are quite flexible and allow for the implementation of projects that arise from the current needs of the individual stakeholders to whom support has been dedicated. However, it should be emphasised that the situation on the eastern border with Belarus and Ukraine causes the needs of beneficiaries to increase in quantitative terms, and the level of the programme's financial allocation is insufficient to enable the planned measures to be implemented.

B. Effectiveness

3. To what extent is the Fund on track to achieve its objectives?

The Instrument for Financial Support for Border Management and Visa Policy 2021-2027 implemented under the Integrated Border Management Fund pursues two specific objectives: **specific objective No. 1: European integrated border management and specific objective No. 2: Common visa policy.**

The individual thematic objectives implement actions which are designed to respond to emerging challenges in their respective areas and, in doing so, are also intended to contribute to the main objective of the Instrument, i.e. to ensure a sound, efficient European integrated management of external borders, thereby contributing to ensuring a high level of internal security within the EU while guaranteeing the free movement of persons within the Union.

So far (exactly in the second half of 2023), two calls for proposals have been announced under the IZGW, **the Facility is therefore in the initial phase of implementation** and it is not reasonable to show the values of individual indicators. **However**, as part of the answer to the research question posed above, **it is reasonable to analyse the logic of the support offered under the IZGW 2021-2027** in order to verify whether the actions outlined for each specific objective are effective in achieving the intended outcomes.

Within the framework of the two aforementioned thematic objectives, actions were planned to contribute to overcoming the barriers identified in each area. Specific Objective 1 was to **support European integrated border management**. Thus, under CS1, it was planned to implement a range of activities including:

- Construction and expansion of perimetry

- Extension of optoelectronic and border surveillance systems
- Training and development of training centres for integrated management of the EU's external border
- Training to improve officers' knowledge
- Construction and expansion of the Automated Radar Surveillance System for Polish maritime areas
- Construction and expansion of infrastructure and buildings at border crossings
- Retrofitting mobile devices or proximity readers (for desktop computers) to read and verify electronic documents
- Acquisition of software for reading electronic documents
- Upgrading the Automated Fingerprint Identification System, Automated Biometric Identification System
- Design and development of technical elements
- Enhancing national capacity to detect document fraud with the European Border and Coast Guard, the European Union Agency for Law Enforcement Training Europol
- Ensure the operation of the National Coordination Centre on a 24/7 basis (recruiting for vacancies, conducting in-house training as needed)
- Carrying out activities, in cooperation with Frontex, aimed at automating the process of reporting data from the Border Guard ICT systems directly to the European Border Surveillance System (EUROSUR) application
- Incorporation of branches of the Border Guard into the EUROSUR area
- Modernisation of the transport fleet (e.g. off-road vehicles, motorbikes)
- Operational support

CS1 logically provides extensive support covering various aspects. Firstly, **enhancing the digital capabilities available to Polish border guards** is key to improving both the quality of border crossings and the quality and reliability of border patrolling. CS1 provides a number of measures to support this aspect, e.g. it assumes the design and development of technical elements, i.e. a European search portal, a common biometric matching service, a common identity repository, a multiple identity detector. In addition, it assumes the modernisation of the Automated Fingerprint Identification System, the Automated Biometric Identification System and the acquisition of software for reading electronic documents, including the retrofitting of mobile devices or proximity readers needed to read and verify electronic documents. CS1 also assumes the enhancement of national capacities in the detection of crimes against document reliability with the involvement of the European Border and Coast Guard, the European Union Agency for Law Enforcement Training Europol, and in this aspect, investments in equipping border crossings with devices for checking biometric fingerprint data may be crucial. The specific objective is also to carry out activities in cooperation with Frontex. The aim is to automate the process of reporting data from the border authorities' IT systems directly to the European Border Surveillance System (EUROSUR) application.

From the point of view of European border management, it is also crucial to **automate border surveillance**. Specific objective outlines actions to support this aspect. Firstly, it includes building and

extending perimetry, extending optoelectronic systems and border surveillance systems, or building and extending the Automated Radar Surveillance System for Polish maritime areas.

Under CS1, it is also possible to carry out **infrastructure measures**, i.e. modernisation of the transport fleet (e.g. off-road vehicles, motorbikes), retrofitting of mobile devices or proximity readers (in the case of desktop computers) for reading and verifying electronic documents, or construction and expansion of infrastructure and buildings at border crossings. The introduction of the above-mentioned infrastructure measures ensures that beneficiaries are able to increase the quality of infrastructure, which is necessary for, among other things, reliable border patrolling.

Specific objective 1 also implements **training activities**. The implementation of these activities is crucial and closely linked to digitalisation activities. Introducing or upgrading new systems can often require training for users. Continuous education and training of border guards in both the handling of border crossings and reliable border patrolling is also important for improving the quality of border management. CS1 therefore assumes the implementation of training courses to raise the level of knowledge of officers, i.e. training in the use of optoelectronic, perimetric and surveillance equipment, training in the implementation of checks, border traffic control, border protection, verification of authenticity of documents, criminal analysis, driving techniques, language training, or training in identification and assistance for persons with special needs, etc. It also assumes the implementation of training and in particular the development of training centres for integrated management of the EU's external border. The training offer is to be extended to include training of officers of e.g. Border Guard for profiling of travellers during check-in or border control; training on enhancing national capacity to detect crimes against document reliability with the participation of e.g. Europol; acquisition and training of tracking dogs for border surveillance etc. In order to improve the quality of border management, it is also important to ensure the 24/7 functioning of the National Coordination Centre and, if necessary, to recruit for vacant posts, to conduct in-house training. Such activities can also be implemented under specific objective 1.

Specific objective 1 also provides the possibility of receiving **operational support**, which simultaneously includes training activities (i.e. training to improve the qualifications and skills of persons responsible for international cooperation and to improve the quality of their contribution to the European information exchange) and activities improving the quality of the digitalisation of Polish border services (i.e. support for the maintenance of IT systems).

From the analysis of the support logic, it follows that it is particularly important to implement both measures increasing the digitalisation of individual border services and training measures in order to ensure the objective and increase the quality of border management. It is also crucial to implement infrastructural measures to increase the quality of the border infrastructure needed for qualitative border checks and the infrastructure needed for qualitative patrolling of the borders of the Republic of Poland. In this aspect, a number of extensive activities covering various aspects have been provided within the logic and support. The support logic has been designed correctly and is able to qualitatively contribute to the objective set for CS1.

At the evaluation stage, it is known that Poland will be involved in the implementation of four projects from the specific actions to support European integrated border management. Poland will therefore be involved in the following projects under specific objective 1: the project entitled '**Support for the**

implementation of Interoperability in Poland', the project entitled **'A mobile system for detecting and locating low flying objects that have illegally crossed the state border using radar technology'**, the project entitled **'Equipment for EBCG national components, purchased under BMVI and put at the disposal of Frontex'**, the project entitled **'Reinforcing surveillance of the EU external border against unforeseen irregular migration'**. These projects, in particular, will enhance the capacity of the border services in terms of its qualitative surveillance.

In addition, at the stage of the conducted evaluation, 3 financial agreements were signed within the framework of specific objective 1. Thus, it is known that three projects: project entitled **"Building technical protection of the external EU border in wetlands, coastal areas and rivers at the section of the border of the Republic of Poland with Belarus"**, the project entitled **"Building technical protection of the external EU border in water areas at the section of the border of the Republic of Poland with Belarus in POSG part II"** and the project entitled **"Modernisation of the radiocommunication system"**, will have a positive impact on the European integrated border management. Within the framework of these, it is planned to modernise the radio communication system of the border service and build technical protection of the EU's external border in the area of the Polish-Belarusian border, which is particularly important in recent times (mainly due to the continuous and uninterrupted influx of migrants from Belarus).

All projects currently planned for implementation are part of the comprehensive implementation of Specific Objective 1, are also in line with the planned support logic and will contribute to the promotion of European integrated border management.

On the other hand, IZGW Specific Objective 2 is to **support the implementation of a common visa policy**. Under CS2, it is therefore planned to implement activities including:

- Further expansion and launch of access for Polish institutions to the Visa Information System and further development of tools for full interoperability of large-scale information systems
- Exchange of components involved in the VIS communication process
- Implementation of the SIS Recast (Schengen Information System)
- Implementation of interoperability tools
- Commencement of the process of reconstruction of the infrastructure of the Central IT System of the Border Guard, with particular emphasis on the expansion of the Backup ICT Node
- Adaptation of consular systems (Visa-Consul system) to work with new and upgraded systems as part of the digitalisation of the visa process;
- Technological and organisational-procedural alignment with the EU Visa Application Portal and digital visa issuance
- Expansion of the Visa Decision Centre
- Provision of training for consular and other staff contributing to the implementation of the common visa policy and consular cooperation, and for staff and staff of the Visa Decision Centre
- Technical reinforcement through provision of necessary equipment
- Operational support

The logic of support under the implementation of specific objective 2 also envisages conducting a number of comprehensive activities. Within the framework of CS2 it is possible to provide **necessary**

equipment relevant for technical strengthening of Polish services. CS2 envisions in this aspect: the possibility of periodic replacement of used and outdated equipment; replacement of all document readers and personalisation printers; ensuring interoperability between resources (in order to build a history of a foreigner to be used for the visa process); providing high-performance infrastructure in order to receive detailed information allowing to take decisions on visa issuing. It is particularly important that the specific objective ensures that equipment that is already worn out can be replaced, rather than just upgraded or repaired, so that completely new equipment can be purchased.

CS2 also envisages **implementation activities**. Various systems will be implemented, a tool which is important for conducting a common visa policy within the EU, i.e. interoperability tools such as the Multiple-identity detector (MID), the SIS Recast (Schengen Information System). It is also planned to develop tools supporting the digitisation of visa processes, mainly through the expansion of the Visa Decision Centre, planned for implementation under CS2. As part of the achievement of the objective, activities will also be carried out for the Visa Information System, its further expansion is planned, the replacement of components involved in the communication process and the launch of access to it for Polish institutions. Important from the point of view of achieving the objective is not only the implementation of new solutions, but also the **adaptation of the existing ones to the ever-changing needs**, in particular those related to the current technological progress and the associated digitisation of all processes. It is therefore planned within the framework of CS2 to adapt consular systems (the Wiza-Konsul system) to cooperate with new and modernised systems within the framework of the greatest possible digitisation of the visa process.

Under specific objective 2, the implementation of **training activities** is also planned. In this respect, training is planned for consular and other staff contributing to the implementation of the common visa policy and consular cooperation, as well as for the staff of Visa Decision Centre. In addition, training activities can be implemented under **operational support**. The operational support offered under CS2 includes language training for persons involved in the management of EU systems: i.e. the Visa Information System. The implementation of operational support also includes activities aimed at increasing the technical capacity of Polish institutions contributing to the implementation of the common visa policy, i.e. maintenance of IT systems and support for the staff operating the aforementioned systems.

The analysis of the support logic shows that the activities planned for implementation will comprehensively contribute to the objective set for CS2. The possibility to purchase new equipment as part of the investment activities, which can be a replacement for already outdated equipment, can be regarded as good implementation practice. However, what is most crucial is that the support offered not only implements new solutions, but also adapts the already existing ones to the ever-changing needs, especially in terms of the current digitisation. It is also important that the support implies the implementation of training activities, including language courses for staff involved in the management of EU systems.

The analysis of the in-depth interviews shows that the support offered in the framework of ICZM 2021-2027 helps all EU Member States to introduce organisational, legal and technological changes on their territories, inter alia, resulting from the Schengen policy. The introduction of these changes supports

the creation of a common visa policy in all EU Member States and supports their integrated border management.

Here, too, the need to create mechanisms for financing by the European Commission results from the directions of development of Schengen area policy and the introduction of draft EU legislation. Here, too, the European Commission, aware that introducing organisational, legal and technological changes in the Member States is time-consuming and also costly in terms of budget, has established such a funding mechanism.

Source: individual in-depth interview with IZGW beneficiary.

Within the framework of the interviews with the beneficiaries, it was additionally addressed that the most important problem to be solved from the point of view of a solid, effective European integrated management of external borders and in particular from the point of view of ensuring a high level of internal security within the EU is the implementation at the borders of the EU countries neighbouring Belarus. The problems associated with the uncontrolled influx of migrants from Belarus to EU countries, including Poland, have forced Poland to increase controls at its border with Belarus. The European Union responded to this need by including the possibility of funding specific measures. In addition, the border guards submitted two projects for implementation in this aspect, i.e. the project entitled **"Building technical protection of the external EU border in wetlands, coastal areas and rivers at the section of the border between Poland and Belarus"** and the project entitled **"Building technical protection of the external EU border in water areas at the section of the border between Poland and Belarus in POSG part II "**.

However, as it were, the fund responded to these actions in terms of specific action and under specific action these additional projects were received by the Member States. Three Member States, Lithuania, Latvia and Poland, were awarded projects under this specific action, Specific action of this call for proposals 1, 5 and 8 for specific challenges related to the situation on the border with Belarus. We submitted more projects here, but we received just two of these actions for the project on water areas.

Source: individual in-depth interview with IZGW beneficiary.

However, under IZGW 2021-2027 it was not possible to finance a physical barrier or an electronic barrier in the border area with Belarus, which created problems for the beneficiaries as they considered this measure as a priority. However, it was possible to obtain funding for the creation of such barriers from national budget and thus they were created in the border area.

(...) it is well known that, as the EU says, it does not give money for physical barriers. We financed the physical barrier on the border with Belarus from national funds and this is also consistent with what we do, with the national budget, because the main part, the first part on the land border was financed from the national budget, the physical barrier and the electronic barrier. We saw the problem because it was the most urgent on the land border.

Source: individual in-depth interview with IZGW beneficiary.

During the in-depth interviews, beneficiaries also indicated that in their opinion it would be reasonable to increase the funds allocated precisely for activities related to increasing border control on the territory of EU countries neighbouring Belarus. Despite receiving additional support from the EU under specific actions and the possibility to finance actions in the area bordering Belarus under both specific objectives of the Programme, it would still make sense to increase funding for these actions in countries that have the kilometre-longest border with Belarus. Supporting kilometres of the border is very costly and it is already difficult for the beneficiaries to implement projects at a pre-planned cost in the border area with Belarus. Increasing the allocation for the above-mentioned measures would also positively contribute to increasing the level of indicators planned to be achieved under the Instrument.

(...) we currently have a ninety-something million euro EU contribution, from what I remember, we assumed we would get around two hundred. (...) Here, too, looking at the fact that we have the longest external border of the Union, of course there was and is such rhetoric that the Balkan states have greater problems, but they do not receive more money either, which is interesting.

Source: individual in-depth interview with IZGW beneficiary.

The beneficiaries also mentioned that it is important to target identical activities also in the countries, areas bordering with Ukraine. Targeting the Polish-Ukrainian border will also contribute to the realisation of the objective set for the IZGW, in particular in terms of increasing the level of internal security within the EU. The implementation of activities in the areas bordering Ukraine will contribute to the levelling of various problems currently faced by Poland - problems related to the illegal influx of migrants from Ukraine, problems related to bringing illegal weapons to the territory of the Republic of Poland from Ukraine.

In conclusion, the analysis of the logic of support indicates that the activities planned within the framework of the ICZM 2021-2027 contribute to the implementation of individual specific objectives set for the Instrument. Actions carried out under each specific objective help to introduce various organisational or technological changes. These changes support the creation of a common visa policy in all EU Member States and support their integrated border management. The analysis of in-depth interviews shows that the priority according to IZGW beneficiaries is the introduction of activities financed under the Instrument on Poland's borders with Ukraine and Belarus. In addition, an increase in the allocation for activities related to increased controls at, inter alia, the Belarusian border would be justified in their view.

4. To what extent is the monitoring and evaluation system adequate to provide information on progress towards achieving the Fund's objectives?

The description of the management and control system drawn up for the Asylum and Migration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy for the period 2021-2027 specifies that all information exchange between beneficiaries and the Managing Authorities of the Programmes shall take place through the **Central Telecommunication and**

Information System - CST2021.² CST2021 is a new system, a successor to the ICT system SL2014, which was not used for MAs in the previous financial perspective 2014-2020.

CST2021 is dedicated to two groups of users: the first group - **external users**, e.g. beneficiaries, applicants, advertisers or bidders; and the second group - **institutional users** - i.e. Implementing Authorities, Programme Managing and Intermediate Bodies, but also Audit and Coordination Bodies.

The CST2021 includes several modules, among others, the **application "CST 2021 - Projects" European Social Fund Monitoring System "SM ESF"**, the **application "WOOD2021 - Grant Application", "SZT2021", i.e. Identity Management System for CST2021, Competitiveness Database "BK2021", "LSI", i.e. Local Information System, CST 2021 Certification, e-Controls, "SR2021" Reporting System**, etc. Institutional users have rights to **all applications** included in CST2021. External users, on the other hand, have access to only **four of its modules, i.e. the application "CST 2021 - Projects" European Social Fund Monitoring System "SM ESF", the application "WOD2021 - Grant Application" and the Competitiveness Database "BK2021"**.

The individual CST2021 modules that beneficiaries are given access to perform specific functions:

- **The application "CST 2021 - Projects"** enables the handling of the project settlement and control process in electronic form. It also provides the possibility of full communication between the beneficiary and the institution supervising the project implementation. This application also transfers e subsidy agreements and annexes to agreements as well as submits payment applications.
- **The European Social Fund Monitoring System** is used to support the process of collecting and monitoring data of entities and participants receiving support under projects implemented with the European Social Fund Plus for the financial perspective 2021-2027. The main objectives of the ESF SM are: (1) monitoring of entities and participants receiving support under projects; (2) management of users involved in the implementation of projects; (3) communication and exchange of information.
- **The "WOD2021 - Grant Application" application** enables the preparation of a grant application template, the management of the call, the preparation and submission of the grant application, the registration of the assessment of the application documentation. In addition, it provides automatic transfer of data from the grant application to the CST 2021 Projects.
- **The competitiveness database "BK2021"** supports the implementation of the principle of competitiveness through the publication of an announcement as well as a search, within which bidders have the opportunity to ask questions, get answers from advertisers and also submit their offer.

In case of any problems with the operation of the CST2021 system, both the external user, i.e. e.g. the beneficiary, and the institutional user, i.e. e.g. the Managing Authority of a given Programme, have

² Department of European Home Affairs Funds, Description of the management and control system Asylum, Migration and Integration Fund, Instrument for financial support for border management and visa policy, Internal Security Fund 2021-2027, September 2023, Warsaw

access to interactive educational materials for CST2021, created by the Ministry of Finance and Regional Policy and published on the website: <https://instrukcje.cst2021.gov.pl/>. Instructions for applications included in the CST2021, i.e. WOD2021 or BK2021, among others, are published on the quoted website. Additional system instructions for CST2021 are also published, inter alia, on the website of the Centre for EU Transport Projects: <https://www.cupt.gov.pl/strefa-beneficjenta/cst2021/>.

The logic of the new monitoring and evaluation system (CST2021) is therefore transparently presented to all interested parties, and information about it can be found, inter alia, on the gov.pl portal. In the event of any problems, beneficiaries or institutions involved in the coordination and monitoring of individual programmes may use the Programme Manual for CST2021, which is available online. CST2021 also provides the possibility of performing all functions important for the monitoring and evaluation of individual programmes, i.e. recording data on programmes along with the required dimensions, e.g. objectives, indicators, categories of regions, codes of intervention types; carrying out the procedure of selecting projects and their subsequent settlement; handling project controls; implementing certification processes, including the creation of applications for payment to the EC; it also provides the possibility of reporting.

The CST2021 system is a **completely new thing for both implementing institutions and beneficiaries of the IZGW**. Therefore, in order to be able to assess in more depth the adequacy of the CST2021 system to provide information on the progress in achieving the objectives of the Instrument, it is also important to know the perspective of the entities directly benefiting from the above mentioned system. **Thus, during the in-depth interviews conducted as part of the evaluation, beneficiaries and institutions involved in the implementation, implementation, coordination of the CST 2021-2027 were asked whether the monitoring and evaluation system was, in their opinion, adequate.** The following conclusions can therefore be drawn from the analysis of the interviews.

During the interviews, respondents emphasised that the CST2021 system is more tailored to the needs of the Structural Funds, and they differ significantly in their specifics from IZGW 2021-2027. For example, the system dictionaries are strictly prepared for the Structural Funds. For this reason, it was necessary to adapt the reporting system to, among other things, adjust the project reporting requirements to the capabilities of the newly introduced system, and this operation was time-consuming. Training on the new system was necessary, and despite this, **it can still pose problems and difficulties**. In addition, the system is something new for both IZGW beneficiaries and the Fund Managing Authority. Thus, when beneficiaries report to the MA, they are often unable to obtain full information on the difficulties reported. Trainings on the operation of the CST2021 system were only conducted internally, **therefore it would be reasonable to realise trainings, which could respond to any arising difficulties with the operation of CST2021 e.g. by an external entity for beneficiaries or institutions implementing the Fund, which would express such a need.**

We all trained ourselves on the training version from the owner of the system, he didn't train anyone, we only had a manual, so everyone went through the training version from the announcement of the call, submission of the application through the assessment and approval of the project, then there is the control, there is the reporting and all this awaits us, so the system is difficult and we have to cope on

our own with the problems we encounter there, the beneficiaries also have problems and they also ask us what to do, and we are not quite able to answer.

Source: individual in-depth interview with IZGW implementer.

A number of training activities should have been carried out as part of familiarising beneficiaries with the new system, but interestingly not every institution had the opportunity to receive such training. In addition, as already shown above, the system is new for both beneficiaries and institutions implementing the IGAs, so the training should have been conducted by an external entity that has comprehensive knowledge and would be able to answer any difficulties related to, for example, submitting grant applications to the CST. Some entities had to spend additional time familiarising themselves with the programme, and it was quite a challenge for them to cope with this task without external support. Again, it is therefore worth mentioning that it **would make sense to implement training courses that could address any difficulties arising with the operation of CST2021, e.g. by an external entity, both for beneficiaries and for institutions implementing the Fund that expressed a need to do so.**

(...) no system training was implemented, not even online. Yes, there were presentations available on the CST website, how to log in, how to... what else is there, how to register an institution, how to sign in. But no one has taught anyone how to... and what is missing, in my opinion, is a presentation on how to assign these roles, what these roles mean, how to submit these applications.

Source: individual in-depth interview with IZGW beneficiary.

In addition, the new system was prepared and implemented top-down by the Ministry of Funds and Regional Policy without the cooperation of the individual ICZM implementers and its beneficiaries.

The problem is that in fact the system has been created and the system has been set up, but no one has talked to us about this system, so to speak. Until now, when we submitted a project application, we received a document, it was created, let's say, between the Ministry and the project service centre of the Ministry of Internal Affairs and Administration, in some cooperation with us, minor or major, but here no one really asked us how the system was supposed to help us collect all this data and make it available to the evaluators.

Source: individual in-depth interview with IZGW beneficiary.

According to the respondents of the in-depth interviews, the production of the new reporting system **therefore lacked a kind of cooperation with the entities involved in the implementation of the Facility and its beneficiaries, so it is not a system ideally suited to their needs**, e.g. to the needs of IZGW beneficiaries related to e.g. project inspections. On the other hand, due to the lack of the above-mentioned cooperation, some of the functions of the CST and the formulations used in it may cause difficulties, e.g. when defining the particular formulations used in the system. Respondents to the in-depth interviews pointed to the fact that some of the specialised formulations used in the CST can be understood in two ways and that in order to enter data correctly, it is necessary to become thoroughly familiar with the specifics of the system and the detailed definitions of the terms used in it.

(...) the system is OK by design, it is just that certain data is entered in such a way that it causes problems, because, for example, the expression 'limits' appears in this system. The first time someone encounters the system, an internal warning light immediately comes on. If it is still someone who works in finance, then for them a 'limit' – as it is for state budgetary units – is an allocation specified somewhere in the budget. Here the limit actually means a target set somewhere in the funds so generally speaking. (...) For example, for the project we have submitted the limit is the strengthening of the capacity to carry out checks at the external borders (...)

Source: individual in-depth interview with IZGW beneficiary.

In addition, in the opinion of IZGW beneficiaries, the **SL2014 system, which was used in the previous financial perspective (however, it was not used for IZGW) was more user-friendly and offered more convenient technical solutions** concerning e.g. data input, i.e. the possibility of loading a data package into the system e.g. in ZIP format. The CST2021 does not have such an option, so that the time to add relevant documents to the system may increase.

(...) it's the 2014 system, it's friendlier than this 2021 system. I haven't worked on that one, but from what I've heard it's friendlier in terms of data entry. You can't enter, for example, a bunch of data into the new system.

Source: individual in-depth interview with IZGW beneficiary.

It is also not very intuitive to register users in the system and give them the appropriate roles. Beneficiaries reported difficulties in that even if an additional person was registered in the CST, they were not able to see the same documents at the same time.

The most problematic thing is connecting the project to the people who want to register for this system and giving them the right roles. (...) So, to put it mildly, maybe again so directly, if there is a call for proposals and someone writes a project, how do you get someone who is from outside the organisation... that is, from the organisation but generally not sitting next to you, how do you include him in that project, how does he register. Alternatively, he registers and then what? We don't see him, his application. He does not see our application. It is quite difficult. For the time being, so to speak, we are trying to organise it ourselves.

Source: individual in-depth interview with IZGW beneficiary.

Some beneficiaries have not yet had the opportunity to take advantage of the new CST2021 system due to the fact that the implementation of CST 2021-2027 is, during the ongoing evaluation, at an early stage. In contrast, most of the beneficiaries who have managed to use the new system have currently only been able to submit a grant application to it. In addition, most of the above-mentioned problems and difficulties are mainly due to the fact that this is a new system, under which, in particular, the beneficiaries of the CST were not properly trained. Thus, the good points of the CST2021 system or its further shortcomings will also emerge at a later stage of IZGW implementation.

During the interviews conducted, the **beneficiaries did not report any difficulties related to the system of indicators created under the IZGW**. Due to the fact that the Facility is in the initial phase of implementation, most beneficiaries, as mentioned above, have only had the opportunity to submit a grant application, and they have not yet reported on the progress of work carried out under the projects. The good points or shortcomings of the indicator systems developed under the Facility will therefore probably only emerge at a later stage of implementation. However, during the interviews, the beneficiaries emphasised that they currently do not identify problems related to the fact that they have to report sensitive data, which are difficult to obtain, as part of their projects.

We have not encountered such problems, although they may arise depending on the type of beneficiary, but in our situation we did not have such cases. Mostly these measures or, as it were, goals which we set for ourselves and which we want to achieve, result, as it were, from the fact of consumption of this project and do not concern sensitive data.

Source: individual in-depth interview with IZGW beneficiary.

Therefore, the analysis of the in-depth interviews mainly shows that, as the CST2021 system is a new tool for both the beneficiaries and the institutions implementing ICZM 2021-2027, it makes sense for them to have the **opportunity to participate in training provided by an external entity** that will familiarise them with the possibilities and respond to any identified difficulties related to operating a system that is new to them. The biggest shortcoming of CST2021, on the other hand, is that its logic and capabilities have been designed without consultation with IZGW implementers and its beneficiaries, making it **not a system that is tailored to the needs of the Facility, rather it is the Facility that has to adapt to the technical possibilities that CST2021 offers**. It is worth bearing in mind that the IZGW is in the early stages of implementation so the good points and shortcomings of its monitoring and evaluation system (including the CST2021 system or the IZGW indicator system) will also become apparent at a later stage of its implementation.

5. How is it ensured that relevant partners are involved at all stages of programming, implementation, monitoring and evaluation?

The draft Programme was mainly developed by the **Department of European Funds of the Ministry of Interior and Administration** with the participation of numerous stakeholders.

The draft Programme was consulted **with beneficiaries of the previous financial perspective**, including the Police, Border Guard, Ministry of Foreign Affairs, Governors and others.

In an effort to remain participatory, the **MA also published the draft Programme** on the ministerial funds website, so that potential applicants could also comment on the draft Programme.

The final stages of the programming were **intra- and inter-ministerial consultations** and the referral of the draft Programme to the Inter-Ministerial Team for European Home Affairs Funds for approval.

A joint **Monitoring Committee for the FAMI, MA and ISF 2021-2027 funds** has been established, which will ensure complementarity between the different funding mechanisms. **The Committee is intended to support MA at every stage, from programming, implementation, monitoring to evaluation**. Representatives of interested third sector organisations have also been invited to participate in the

work of the Monitoring Committee, so that the partnership principle can be effectively implemented. An invitation to nominate representatives to become members of the Monitoring Committee was received from: - Joint Government and Local Government Commission, Social Dialogue Council, Public Benefit Activity Council, International Organisations - IOM Poland, UNHCR - Representation in Poland, Government Plenipotentiary for Disabled Persons' Affairs, Government Plenipotentiary for Equal Treatment, Conference of Rectors of Academic Schools in Poland, Central Council of Research Institutes.

By the time of the survey (February 2024), the Monitoring Committee had met twice, allowing it to adopt the Committee's rules of procedure and select the methodology and criteria for project selection. The work of the Committee was assessed positively in the qualitative study.

Effective management of European funds requires experience, adequate commitment of human resources and definition of procedures. Taking into account the experience of the 2014-2020 financial perspective, the **MA has delegated part of the tasks to COPE**, which has the corresponding experience in: assessing applications, concluding agreements with beneficiaries, supervising the implementation of projects co-financed with external funds, clearing and monitoring/controlling, and recovering amounts irregularly paid.

6. To what extent are horizontal principles respected and promoted within the Fund?

Beneficiaries of the Financial Support Facility for Border Management and Visa Policy 2021-2027 are required to comply with the so-called horizontal principles in the following three areas in their projects:

1. **sustainable development** (activities should protect the environment and biodiversity),
2. **equal opportunities and non-discrimination** (actions assume equality of all social groups, i.e. ethnic, national, religious or persons with disabilities),
3. **gender equality** (activities assume equal access and development opportunities for women and men).

IZGW beneficiaries emphasise that the projects they undertake as part of their funded projects are neutral or in line with the above principles. This is due to the Regulations, which require applicants to have a horizontal policy in place. Indeed, its absence excludes the possibility of applying for funding. A positive impact is particularly noted in the **principle of gender equality**, where one entity has implemented a gender equality plan, and in the **principle of sustainability**. The interviewees try to ensure that the renovations they carry out are environmentally friendly and use energy-efficient technologies. However, they point out the lack of funding for some environmentally friendly solutions, such as heat pumps or photovoltaics. Also **the principle of equal opportunities and non-discrimination** does not cause problems for the beneficiaries. Their investments, as they emphasise, are accessible to everyone regardless of religion or origin and adapted to the needs of people with disabilities.

7. To what extent does the Fund contribute to the communication and dissemination of the opportunities and achievements created?

Applicants agree that they do not find it difficult to obtain information about current calls for proposals. The Ministry's websites, which contain announcements about the possibility of obtaining subsidies, are

clear and understandable. An additional advantage is that the Ministry of the Interior and Administration sends letters (written information) to individual beneficiaries with an invitation to participate in a dedicated call (limited or direct).

However, the information and promotion activities carried out in the projects must meet certain conditions:

The recipients of Union funding shall acknowledge the origin of those funds and ensure the visibility of the Union funding, in particular when promoting the actions and their results, by providing coherent, effective, meaningful and proportionate targeted information to multiple audiences, including the media and the public. The visibility of Union funding shall be ensured and such information shall be provided, except in duly justified cases where it is not possible or appropriate to display such information publicly or where the release of such information is restricted by law, in particular for reasons of security, public order, criminal investigations or the protection of personal data. To ensure the visibility of Union funding, recipients of Union funding shall refer to the origin of that funding when publicly communicating on the action concerned, and shall display the Union emblem.

Source: Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021, Article 24.

Interviewees indicate that they follow the above guidelines. The equipment and materials they purchase are appropriately labelled and project sites are provided with signs. They also point out the public nature of the investments carried out by the projects, which, according to them, fulfils the principle of visibility and communication.

C. Performance

8. To what extent does the Fund support cost-effective measures?

Cost-effectiveness is one of the **basic elements** in **assessing the eligibility of** expenditure in the IZGW. It is mentioned in the "Beneficiary Handbook" at alongside conditions such as being in line with the objectives of the fund or the necessity of the expenditure to implement the activities - all of these conditions, along with several others, must be met for an expenditure to be considered eligible. This makes potential beneficiaries aware of the importance of cost-effectiveness from the outset. In this handbook, cost-effectiveness is understood as an input-output relationship.

Cost-effectiveness is also related to the requirements for incurring costs for the salaries of people involved in project implementation. Among the requirements for the eligibility of employment costs is the provision for 'efficient performance of tasks'.

For example, the mentioned handbook for beneficiaries also informs potential beneficiaries about the impossibility of settling costs related to transport, travel and maintenance, which exceed the rates specified in the regulation of the Minister of Labour and Social Policy of 29 January 2013 on receivables to which an employee working in a state or local government unit of the budgetary sphere is entitled on account of a business trip (Journal of Laws of 2013, item 167, as amended). This makes potential beneficiaries obliged to follow certain maximum rates and avoids cost increases in projects.

9. To what extent is the Fund's management and control system efficient?

Article 71(1) of the General Regulation requires Poland to fulfil the management, control and audit requirements of the Funds.

The aforementioned regulation defines the institutions that should operate in the national management, control and audit system for the Asylum, Migration and Integration Fund (FAMI), the Internal Security Fund (ISF) and the Financial Support Facility for Border Management and Visa Policy (FGV). They are:

- Managing Authority (Article 71(1) of the General Regulation);
- The Audit Authority, which is a public body (Article 71(2) of the General Regulation);
- Intermediate Body designated by the Managing Authority (Article 71(3) of the General Regulation);
- Monitoring Committee for the implementation of the programmes (Article 38(1) of the General Regulation);
- FAMI Funds Officer, IZGW and ISF for monitoring the fulfilment of the horizontal basic conditions listed in Annex III of the General Regulation.

On the basis of Resolution No. 126/2022 of the Council of Ministers of 7 June 2022 on the designation of the competent authorities operating within the management and control system of the Asylum, Migration and Integration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy under the Integrated Border Management Fund for 2021-2027, the Department of European Funds of the Ministry of Interior and Administration (DFE) was appointed as the **Managing Authority**.

The DFE is an organisational unit of the Ministry of Interior and Administration. The DFE, as MA, is responsible for all issues related to the management of the IZGW. The MA (with the support of the IB) is at the same time the Institution performing the tasks of expenditure accounting.

The Intermediate Body was the European Project Service Centre of the Ministry of Interior and Administration.

The Head of the National Fiscal Administration is the **Audit Institution** for the IZGW. The tasks of the Audit Institution are carried out through the Department of Audit of Public Funds of the Ministry of Finance and the 16 Chambers of Fiscal Administration.

There is also an important role in the management and control system:

- **Monitoring Committee**, established by Order No. 4 of the Minister of Interior and Administration of 3 March 2023 on the establishment of the Monitoring Committee for the European Funds for Migration, Borders and Security 2021-2027,
- **Plenipotentiary of the Minister of the Interior and Administration for European Funds for Migration, Borders and Security at the Ministry of the Interior and Administration** (Order No. 33 of the Minister of the Interior and Administration of 13 December 2022).

This structure of the management and control system ensures that the **principle of separation of functions** between and within the programme institutions is respected.

In the document *Description of the management and control system. Asylum, Migration and Integration Fund. Financial Support Facility for Border Management and Visa Policy. Internal Security Fund 2021-2027*³ details the organisation and procedures for the functions and tasks of the various institutions, as well as a description of the electronic system, the Central Information and Communication System (CST2021).

The IZGW's management and control structure is clear to beneficiaries; they know the terms of reference and roles of the various institutions involved in the implementation of the Fund.

The good knowledge of the organisational structure is due, among other things, to the long cooperation (previous financial perspective 2014-2020), during which specific ways of communication were developed. At the same time, beneficiaries highly rate the quality of contacts with MA/IP at each stage of cooperation.

Information on fundraising opportunities is communicated in a timely manner and the information is coherent and formulated in a way that does not raise major questions. Beneficiaries also emphasise that it was important for the improvement of cooperation with MA/IP that they were also invited to cooperate at an earlier stage - the design of support (creation of the provisions of the Polish MA Programme).

As highlighted by beneficiaries, electronic communication is now important, and the website is an important element of this. The COPE website is easy to understand for its audience:

This website has a very clearly structured architecture(...). The information is kept up to date, which is important to note, as this is not standard.

Source: individual in-depth interview with IZGW beneficiary.

Although, for the time being, the respondents have no experience of project implementation in the new perspective, they are not worried about implementation problems resulting from MA /IP actions. Instead, they express concerns with regard to CST2021.

The first problems already occurred at the application stage, when submitting grant applications. As they emphasise, they have moved from the 'traditional' way of submitting applications to the system, so if someone has not had previous experience of using, for example, the SL2014 application with other funds, it is difficult for them to find their way around in CST2021 (although these two versions of the application also differ strongly).

As one IZGW beneficiary pointed out, it is not an easy system, and there was a lack of training on how to use it, both application and reporting.

At the same time, however, it may be considered that it is not the sheer difficulty of operating this system (or individual applications), but rather the unfamiliarity with how it works:

This presentation is missing (...) how do you assign these roles [in the system], what do these roles mean and how do you submit these requests? (...) How do you

³ <https://www.gov.pl/attachment/934471bc-c1f5-42dd-8f4d-a7e389c6ad53> (dostęp: 26.02.2024 r.).

upload documentation in this system? Do you register the documentation, print it out or plug it into some electronic workflow system?

Source: individual in-depth interview with an IZGW beneficiary

The assessment of the management and control system on the part of IZGW beneficiaries is positive, the system is efficient. Currently, **no elements affecting the efficiency of this system have been identified**. However, it should be noted that beneficiaries express a lot of concern about the operation of the new ICT system CST2021 and the change in the way projects are applied for and reported on related to its implementation.

10. To what extent is there scope for further simplification in the implementation of the Fund? In what way?

Due to the low level of involvement in the Fund's implementation work, both beneficiaries and implementers are unable to identify specific proposals for simplification.

As the representatives of the MA emphasise, in implementing the Fund under the current perspective, they try to use - as far as possible - the principles and regulations established in the previous programming period.

(...)the procedures we had in the 2014-2020 perspective were good, the audit always gave us high marks, so we tried to keep as much as possible of the procedures from the 2014-2020 perspective plus add what the new general regulation requires of us, including a slightly bigger monitoring committee, the IT system, which was the biggest challenge for us, but the procedures themselves are not so different from the last perspective

Source: individual in-depth interview with IZGW implementer

Thus, right from the initial stage of implementation, duties and 'redundant' procedures were identified that could be eliminated, as they did not contribute to the efficiency and effectiveness of the Fund's management and control activities. Further proposals for possible simplifications will be possible in the next stages of implementation of the IZGW.

D. Coherence

11. To what extent is the Fund coherent with initiatives supported in its policy area, in particular under the Thematic Instrument, using different implementation modalities.

Activities that are consistent with the intervention implemented through the IZGW are initiatives funded by the **Norwegian Financial Mechanism 2014-2021 under the Home Affairs Programme** for thematic area 20 'International police cooperation and combating crime'.

The aim of the Programme was to strengthen law enforcement cooperation, including the prevention and detection of organised crime through:

- ensuring that law enforcement officers have access to new technologies and appropriate training;
- strengthening cooperation between national and international law enforcement agencies such as Eurojust, Europol, Interpol or Frontex⁴.

The Programme implemented, among others, the project "Strengthening border protection of the EU through the development of canine training activities, expansion, reconstruction and infrastructural retrofitting of the OSS SG in Luban", implemented in 2020-2023 by the Border Guard Headquarters in partnership with the State Border Guard Service of Lithuania and the Kennel Centre of the State Border Guard Service of Ukraine. The project consisted in training officers in Border Guard branches prepared to work independently as an instructor-selector in the training of service dogs, helping to combat cross-border crime⁵.

It is to be expected that projects implemented under the IZGW **will also be coherent with activities financed from the next edition of the NMF**, which will be launched in 2024. From the interviews conducted, it appears that the final scope of support has not yet been approved.

Taking into account the objectives and actions foreseen, the support provided under the IZGW is also consistent with the funding provided under the **Thematic Instrument**, under which Poland received funding for the implementation of specific actions. Under the call BMVI/2021/SA/1.5.8 'Support for Border Management' announced by the European Commission, funding was granted for the project 'Strengthen the surveillance of the EU's external border against unforeseen irregular migration', implemented by the National Border Guard Headquarters. The project consists of two packages:

- Building technical protection of the EU's external border in wetlands, coastal areas and rivers along the Polish-Belarusian state border - the package provides for the extension of the existing electronic state border protection on the Polish-Belarusian border on the Svisloch, Istoczanka and Bug rivers,
- Modernisation of the radio communication system - the package envisages strengthening border security at the Poland-Belarus section of the border as well as the sections of the border in the immediate vicinity due to the pressure of migrants on the border and attempts to cross it illegally.

The aforementioned projects were included in the approved Polish IZGW Programme.

A complementary project to the above is:

- Building technical protection of the EU's external border in water areas at the section of the Polish-Belarusian border at POSG part II - the package envisages the extension of the existing electronic protection of the state border at the Polish-Belarusian border on the Świsłocz and Istoczanka rivers (31.5 km).

⁴ [NMF Home Affairs Programme](#), (accessed 27.02.2024).

⁵ [Strengthening EU border protection through the development of canine training activities, expansion, reconstruction and infrastructural retrofitting of the OSS SG in Luban](#), (accessed 27.02.2024).

These activities are complementary to the **projects on enhancing border security implemented from the state budget** (construction of electronic state border security at the EU external border section) and are a continuation of the project "Extension of the technical protection systems of the EU external border in terms of surveillance equipment", which was implemented under the CSF 2014-2020.

In addition, Poland has applied for funding for the following projects in calls under specific actions:

- Under call BMVI/2021/SA/1.5.4 'Support to comply with the implementation of the relevant interoperability legal framework' for the project 'Support for the implementation of Interoperability in Poland',
- Under call BMVI/2021-2022/SA/1.2.1 'Innovation for sea/shore, and/or land border surveillance (operational testing in pilot projects)' for the project 'Mobile system for the detection and localization of low-altitude flying objects using radar-vision technology that have illegally crossed the national border'.

Within the framework of the EU Thematic Instrument IZGW activities, the project "Enhancement of Immigration Liaison Officers' Activities in Central Asia" has been implemented by the COPE of the Ministry of Internal Affairs and Administration from 2023 to 2025. The initiative aims to combat irregular migration to the EU by streamlining the procedure for confirming the identity of Central Asian citizens and organising return activities by strengthening the cooperation and qualification of Central Asian migration authorities through the activities of EU Migration Liaison Officers operating in Central Asia and support to EU Member States⁶.

In addition, the European Commission announced and implemented two other calls under the Thematic Instrument (EU actions). The first concerned support for pilot projects for the development and launch of national quality assurance mechanisms to ensure the implementation of EU legislation in the area of external border management and the development and launch of a fundamental rights monitoring mechanism, and the second concerned support for innovative forms of cooperation for the strengthening of the national components of the European Border and Coast Guard. There were no entities from Poland among the projects that received funding⁷.

The consequence of Russia's full-scale aggression in Ukraine, in turn, was the mobilisation of additional IZGW funds in 2022, which were granted to Poland by the European Commission under the **emergency aid** mode. These funds were aimed at strengthening the border infrastructure on the external border of the European Union. The amount of this support provided in 2022 was more than €76 million⁸.

Actions consistent with the intervention in the IZGW are also the **CCEI (Customs Control Equipment Instrument) Financial Support Programme**, funded by the European Commission from the Integrated Border Management Fund. The objective of the instrument is to support the customs union and national customs authorities in protecting the financial and economic interests of the European Union

⁶ [Funding & tenders \(europa.eu\)](#), (accessed 13.03.2024).

⁷ [Funding & tenders \(europa.eu\)](#), (accessed 13.03.2024).

⁸ [Almost PLN 700 million from the EU to support refugees from Ukraine - Ministry of Interior and Administration - Gov.pl Portal \(www.gov.pl\)](#), (accessed 13.03.2024).

and the Member States by ensuring uniform standards in the performance of external border controls, reducing inequalities between Member States due to geographical differences and differences in capacity and resources. It should be noted that the equipment purchased under the CCEI covers the control of goods, while the equipment purchased under the ICEI covers only the control of persons, so the support under the two instruments is complementary.

The following projects will be implemented within the allocated funds:

- "Strengthening the operational efficiency of the National Fiscal Administration". - project activities concern the retrofitting, construction, modernisation and development of scanning infrastructure at the external border with the Russian Federation, Belarus, Ukraine, as well as at the maritime and OC postal borders. The value of the project - approximately PLN 148 million.
- "Strengthening the operational capacity of the National Fiscal Administration laboratories". - activities under the project concern the purchase of specialist equipment for KAS laboratories. The aim of the task is to eliminate equipment shortages, replace worn-out equipment and ensure continuity of laboratory operations for the next years. Value of the project - approximately PLN 10 million⁹.

Support from the IZGW is also consistent with border management activities **financed from the state budget**, implemented under statutory obligation by the Border Guard, the Ministry of Foreign Affairs, consulates, the Office for Foreigners and Provincial Offices. In addition, additional funds supporting the Polish services are also made available under the **Programme for Modernisation of the Police, Border Guard, State Fire Service and State Protection Service in the years 2022-2025** (inter alia, expenditure on equipment and personal equipment of officers, construction investments, strengthening of the full-time staff of uniformed services, strengthening of the motivational system of officers' emoluments).

12. To what extent is the Fund consistent with other sources of EU funding (including other home affairs funds) and in particular with EU external action?

The assessment of the coherence of ICZM activities with other EU-funded initiatives included primarily an analysis of home affairs funds and programmes co-financed under cohesion policy, but also other sources of EU funding, such as the Neighbourhood, International and Development Cooperation Instrument (NDICI).

It is assessed that there is coherence between **MAF and FAMI and ISF** related to the delimitation and differentiation properly carried out at the level of objectives, needs, types of projects, beneficiaries and instruments of support. All three Funds should be considered as a broad coherent mechanism for supporting activities carried out by public institutions and NGOs in the field of migration, internal security and border management.

⁹ [Instrument for financial support - CCEI - Ministry of Finance - National Tax Administration - Gov.pl Portal \(www.gov.pl\)](https://www.gov.pl), (accessed 12.03.2024).

At the level of ongoing (or planned in the future) projects, in particular, strong links can be seen between the IZGW and **the Internal Security Fund**. Indeed, one of the strategic objectives of the ISF is to *'Develop the necessary IT solutions and actions to improve the exchange of information between law enforcement and other competent authorities and EU bodies, interoperability with existing or planned future information systems and databases developed by the EU or other Member States'*. The realisation of this objective requires, among other things, the modernisation of existing EU information systems, including support for existing systems under the Schengen Information System (SIS) and Eurodac. Another action needed is the implementation of new large-scale EU information systems, e.g. EES, ETIAS, ECRIS-TCN. This assumes that national systems will need to be aligned with the EU-wide agreed processes for the operation of SIS and the SIRENE Bureau. In ISF 2021-2027, the planned activities in this respect are implemented under CS 1 (Information Exchange). For the implementing measure (a) the envisaged activities will partly continue the projects undertaken in 2014-2020 and will consist of the development of the SIS and the Europol system for improving data quality in ICT systems. Separate actions will implement the recommendations of the evaluations on SIS and data protection issues. Meanwhile, under implementing measure (b), resources are foreseen for the development and adaptation of national systems to the requirements of the evolving EU information systems and their interoperability tools, including as regards the operation of the SIS and SIRENE Bureau. For **FAMI**, no such coherence is identified at the level of planned or ongoing projects.

Also, coherence can be referred to in relation to the link between IZGW activities and cohesion policy programmes implemented under the **EU Cohesion Policy**. In this relationship, coherence consists in ensuring complementarity at the level of objectives and scopes of support of these funding sources. The Cohesion Policy programmes support uniformed services in terms of infrastructure and equipment to fulfil their tasks in the following areas:

- ➔ under Priority Objective 2 (A greener, low-carbon, transition towards a zero-carbon economy and a resilient Europe through (...) risk prevention and management (...)) - for carrying out actions related to protection against emergency situations related to environmental risks,
- ➔ under Priority Objective 3 (A better connected Europe through increased mobility), in the implementation of traffic safety measures.

The coherence between the support under the Cohesion Policy and the activities of the IGZW lies first and foremost in the comprehensive approach to support for uniformed services while targeting the types of support and separating them into different funding sources. Indeed, the IGZW finances another type of projects aimed at the services consisting in supporting the implementation of activities related to ensuring strong and effective integrated European management of external borders while safeguarding the free movement of persons.

However, in addition to such generally understood coherence related to demarcation, it is also possible to identify linkages at the level of projects financed by the Cohesion Policy funds. As IZGW funds will be used, inter alia, for the development of ICT systems, it is possible to implement complementary projects under the **European Funds for Digital Development 2021-2027** programme. In particular, it is worth pointing out at this point the possibility of implementing projects under Measure FERC.02.01 *High quality and availability of public e-services*, which provides for the implementation of projects involving the construction, modernisation and further development of e-services and systems

necessary for their provision, including back-office processes. Also under Measure FERC.02.02 *Strengthening the national cyber-security system*, it is possible to implement projects that are complementary to the actions taken under the IZGW. This is particularly important as the ICT systems being developed within the IZGW must have the highest level of protection against cyber threats due to the high level of data sensitivity.

Another EU-funded programme, which at the level of activities is coherent with the IZGW, is the **Interreg Next Poland-Ukraine 2021-2027 Programme**. Within the framework of the envisaged support, Priority 5 - Borders has been designated, which both at the level of needs, objectives and types of support is complementary with the IZGW, in particular in the field of management of border crossings and development of cooperation between customs and border protection services. The necessity of complementarity with the IZGW is emphasised in the very content of the Programme, where it is indicated that "activities aimed at improving the infrastructure of border crossings should be coordinated with the institution managing the IZGW, in particular with regard to the construction and development of buildings or investments in equipment for the verification of electronic travel documents and biometric fingerprints"¹⁰. More than €13 million is planned for the implementation of projects under Priority 5.

Potential coherence may also occur between HE funded activities and **Horizon Europe** projects. It is desirable that the results of ongoing research and developed innovations (funded under HE) are also used in the field of border surveillance.

When analysing the coherence of the IZGW, it is impossible not to mention the planned cooperation with **Frontex**. According to the provisions of the programme itself, in the years 2021-2027 this cooperation will take place primarily in two fields. Firstly, representatives of the Polish Border Guard will participate in the work of the European Integrated Border Management (EIBM) Working Group and in meetings. Secondly, the participation of the Border Guard in Frontex activities is envisaged, which stems from Regulation (EU) 2019/1896 and the Agency's work plan set out in the Single Programming Document 2022-2024.

¹⁰ Interreg Next Programme Poland - Ukraine 2021-2027, p.27

E. EU added value

13. To what extent does the Fund generate EU added value?

European added value (EAV) is an increasingly important criterion for assessing the soundness of actions funded by the EU budget. EAV refers to the additional value created by the fact that an action has been financed by the EU budget rather than by the budgets of individual Member States. Additional value is generated by the establishment of a single framework for action, which leads to the pursuit of the same objective and can also create economies of scale. Similarly, EAV is defined within the framework of the IEA annual reports: *EU added value means generating results beyond what Member States would have achieved by acting alone*¹¹.

EAV is generated at several levels, taking into account, inter alia, the impact on the reduction of social inequalities, the sharing of the costs of actions between the EU and Member States, or a coherent approach to achieving EU objectives. At the same time, it is an ambiguous value, difficult to examine due to its interdependence (it is not known what scale of effects would occur if EU Member States were to implement the actions in question alone). Analysing the available studies on EAV, the Study Team concluded that, within the framework of EAV, the most relevant issues to be investigated when assessing the generation of added value are:

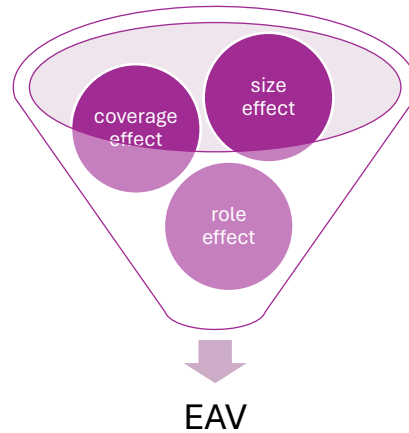
1. Implementation of EU legislation into the Polish legal order;
2. The occurrence of economies of scale;
3. Cross-border cooperation to learn about best practices and decision-making processes in other countries;
4. Addressing cross-border threats and challenges;
5. Networking of cooperation within the Fund - both at national and international level.

EAV levels

EAV within the Fund can be assessed by three key criteria, which are **size effect, reach effect and role effect**.

¹¹ Annual implementation report on the Financial Support Facility for Border Management and Visa Policy to be submitted by Member States to the Commission in accordance with Article 29 of Regulation (EU) 2021/1148, financial year 1 January 2021-30 June 2022, p. 4.

Scheme 2. EAV components within the IZGW



Source: own study.

The size effect includes additional actions that have been taken or will be taken in the near future within the IZGW.

The outreach effect is linked to the widening of the range of people targeted for support. If it were not for the intervention, the ultimate beneficiaries would not have received support.

The role effect, on the other hand, determines how the intervention affects the beneficiaries - the institutions and organisations entitled to benefit from it.

EAV from the point of view of the end user

EAV was assessed by referring to the level of change that will be observed by the beneficiaries and recipients of the final support. When defining the final recipients of the support, it was decided to include in this group all inhabitants of Poland, as well as the EU, who will feel the benefits associated with an increased level of security. From this point of view, it is necessary to point to the increased level of security in the country. Secondly, a more efficient service at border crossings. Furthermore, on the acceleration of clearance at border crossings. Increasing the capacity of border services to cooperate across borders will result in an increase in their competence, the exchange of good practices and the possibility of counteracting threats penetrating our country from outside. The comfort of border crossing will also increase. There will be a decrease in the number of people who cross the border illegally, often at the risk of life and health. Consequently, the number of people offering assistance in organising such a border crossing will decrease.

Scheme 3. EAV from the point of view of the end user



Source: own study.

In addition, it is important to point out unintended effects that also add value. For example, night vision systems make it possible to capture and record animals moving across the border in forested areas. This makes it possible to observe the migration routes of animals, their habits and behaviour, which can be of valuable naturalistic value, e.g. for researchers dealing with fauna in border regions.

We have such a pilot system made from the currently ending security funds in the Bieszczady department, where there are animals moving around a lot. We have photos and films and I also once presented such, I presented this at the interdepartmental team, and in fact, if you looked closely at one corner, I showed our group that you could even spot a mouse running somewhere there in the grass. I laughed that the system was so sensitive that even a mouse wouldn't slip through.

Source: individual in-depth interview with IZGW beneficiary.

EAV from the perspective of the beneficiary

Added value will also follow for the beneficiaries. In this case, one can point to the improvement of equipment and instrumentation at border crossings, including the creation of ICT infrastructure, a radar border surveillance system, mobile perimeter, thermal and night vision equipment, optoelectronic systems, as well as other measures, such as the digitalisation of the visa process. All this promotes the efficiency of the services. On the other hand, ongoing training of those responsible for border management can increase the competence of those representing state services and bodies, which will improve the quality, efficiency and effectiveness of their work. On the other hand, international cooperation to counter cross-border threats will foster the exchange of knowledge, experience and good practices.

Scheme 4. EAV from the perspective of the beneficiary



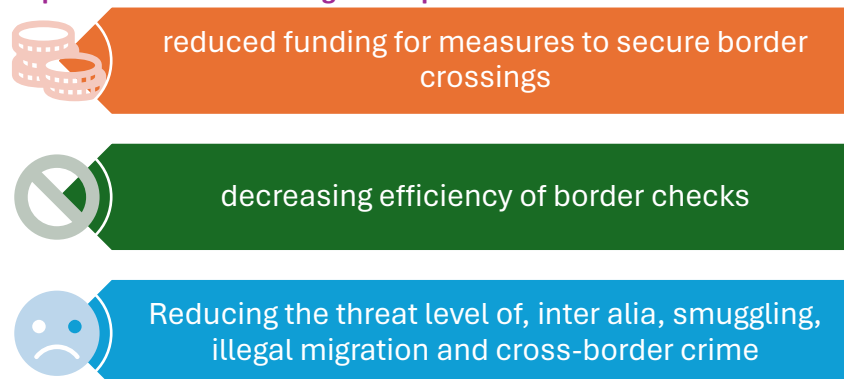
Source: own study.

The values contributed by EAV are shown in the diagram above.

Summary

Poland's eastern border is also the external border of the EU. The ongoing war in Ukraine and the recent Polish-Belarusian border crisis (from mid-2021) are causing increased threats and challenges to the monitoring of state borders. This is due to two issues: firstly, along with the wave of refugees, persons who may pose a threat to the security of Poland may try to enter Poland. Their entry into Poland will give them freedom of movement throughout the Schengen area, which may pose a challenge to all European countries. The second reason is the risk of violation of the Polish airspace, which has already happened several times (intentionally or accidentally) in connection with the ongoing conflict in Ukraine. Hence, an effective border monitoring system is extremely important and the benefits of increased security of the Polish border will be felt by all EU countries.

Scheme 5. Consequences of discontinuing the implementation of the ICZM



Source: own study.

The discontinuation of IZGW funding would result in acute consequences in terms of increased cross-border threats. In addition, it is necessary to continuously monitor the border with ever new and more



effective measures, as new forms of crime, e.g. the transport of illegal substances by drones across the border, mean that existing methods will not meet the new challenges.

Conclusions, suggestions and recommendations

The ICZM was implemented with a long delay, as it was only at the end of 2022 that the Polish Programme of the ICZM 2021-2027 was approved. For this reason, it is difficult to assess the degree of achievement of the objectives. Given that the delay affected not only Poland, but all countries, it is recommended that Poland participate in discussions with the EC on removing the obligation to make 10% of certified expenditure under the programme by the end of 2024 in order to receive additional funds from the Facility Reserve and replacing it with an obligation to contract 10% of the funds within the basic allocation.

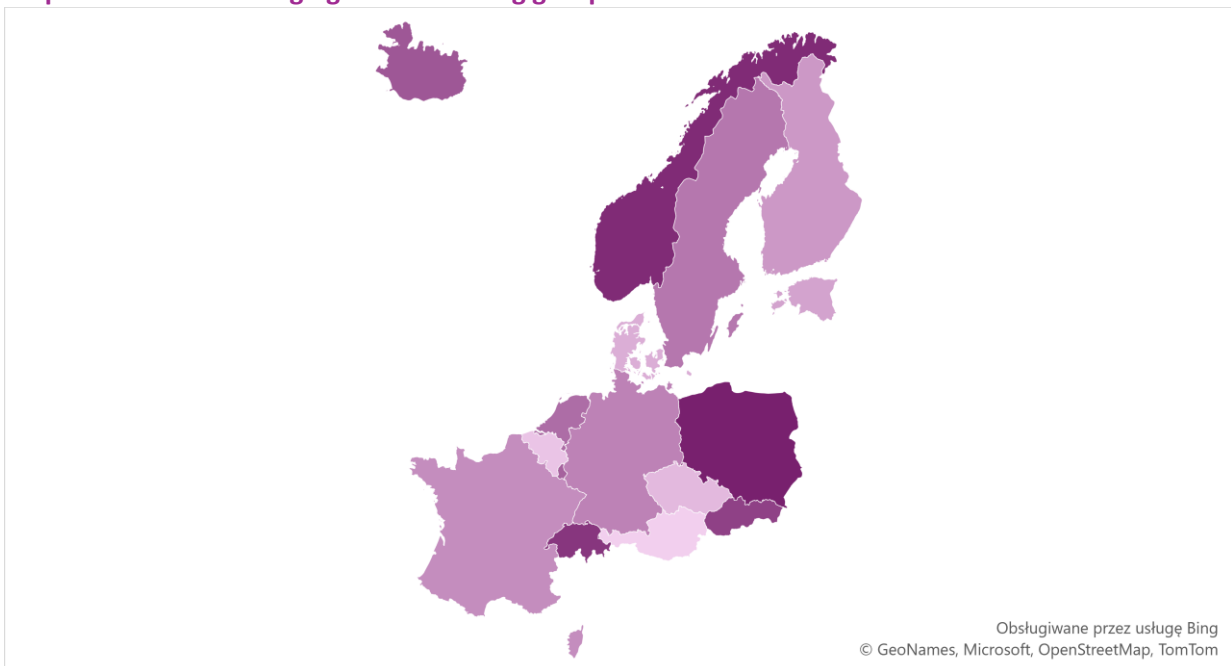
The analysis of the interviews and the logic of support indicates that the actions planned within the framework of the IZGW 2021-2027 contribute to the implementation of individual specific objectives set for the Instrument. The priority, however, according to the beneficiaries of the IZGW is the introduction of activities financed under the Instrument on Poland's borders with Ukraine and Belarus. Additionally, an increase in the allocation for activities related to the increase of control, inter alia, on the Belarusian border would be justified in their opinion.

As the system for evaluation and monitoring of CST2021 is a new tool for both beneficiaries and institutions implementing ICZM 2021-2027, it makes sense for them to have the opportunity to participate in training provided by an external entity that will familiarise them with the possibilities and address any identified difficulties in operating a system that is new to them. On the other hand, the currently identified biggest shortcoming of CST2021 is that its logic and capabilities have been designed without consultation with ICZM implementers and its beneficiaries, making it not a system that is tailored to the needs of the Facility, rather the Facility needs to adapt to the technical capabilities that CST2021 offers.

Examples of good practice

Good practice within the IZGW includes the existence of an informal working group that meets once or twice a year. This group is common to IZGW and ISF. The existence of the group allows lobbying on behalf of the participating countries before the EC, which strengthens the voting power of the individual countries involved. The group includes - apart from Poland - 16 countries: Austria, Belgium, Czech Republic, Denmark, Estonia, Finland, France, the Netherlands, Iceland, Liechtenstein, Luxembourg, Germany, Norway, Slovakia, Switzerland, Sweden. These countries are shown on the map below.

Map 1. Countries belonging to the working group on ISF and IZGW



Source: own compilation based on individual in-depth interviews with implementers.

Although the group's meetings occur relatively infrequently, only twice a year, Programme implementers expressed satisfaction with its existence, as reflected in the in-depth interviews.

We have a very intense exchange of experiences, opinions and it is very interesting.

Source: individual in-depth interview with IZGW implementer.

The group provides opportunities to lobby for solutions that may benefit its members, an example being the issue of changing the requirement to have a 10% certification of the basic allocation in order to receive additional funds from the reserve to contracting funds at this level in order to receive the reserve. Indeed, delays in the implementation of the Fund have meant that many countries may struggle to meet the conditionality. The presentation of the group's position may have the advantage over the voice of a single country in favour of strengthening the voice expressed.

In addition to this, all countries participating in the IZGW have representation on committees in working groups at EU level. Within these groups, the shaping of the legal environment concerning the Fund takes place, among other things by amending legal acts.

All Member States are represented in committees and working groups at European Commission level. And these groups mainly deal with amendments to legislation.

Source: individual in-depth interview with IZGW implementer.