EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

Directorate E – HOME Affairs Funds
E.3 – North, West & Central Europe (II)

Brussels
HOME.E.3/[redacted] ersonal data

Subject: Observations on the annual performance reports submitted in 2025, AMIF, BMVI and ISF, Poland

Dear Mr [redacted]a

According to Article 35(1) of Regulation 2021/1147, Article 29(1) of Regulation 2021/1148, and Article 30(1) of Regulation 2021/1149 the Commission received on 14 February 2025 the annual performance reports for the Member State programmes of Poland under the Asylum, Migration and Integration Fund, the Border Management and Visa Instrument, and the Internal Security Fund for the accounting year covering the period 1 July 2023 – 30 June 2024.

Following the assessment of the reports, we would like to make some observations on the content, with a view to the preparation of next years' reports. Please find our main observations in the annex to this letter in accordance with Article 35(3) of Regulation 2021/1147, Article 29(3) of Regulation 2021/1148, and Article 30(3) of Regulation 2021/1149. No formal resubmission of the Annual Performance Reports is requested.

In addition to the recommendations, please kindly provide to the desk officer in charge for Poland, Aneta Gajda, a current update on the implementation of all Specific Actions projects. Please include information on the main developments and achievements up to date, as well as on changes to the approved project timeline, indicators, any issues encountered. Please indicate impact of the delays on the needs addressed by the project. We would be grateful if you could provide this by email within the coming month.

Yours sincerely,

[redacted]

[redacted]
Ministry of the Interior and Administration
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Enclosure: Observations on the Annual Performance Reports submitted in 2025 – AMIF, BMVI and ISF – Poland

c.c.: [redacted]

Observations on the Annual Performance Reports submitted in 2025 – AMIF, BMVI and ISF – Poland

General:

As regards reporting, please refer to the Revised Background Note on the Annual Performance Report, which was sent on 26 January 2024 (ref. Ares (2024)613788).

Section 1.1 - Progress in the implementation of the programme:

We took note of the actions taken to reinforce programme implementation, such as the revision of timetable of calls under BMVI. We strongly encourage you to continue with your efforts to speed up implementation of Poland's programmes under the Home Affairs Funds, including a regular analysis of the contracting situation, and the introduction of measures mitigating delays, where appropriate in consultation with the project beneficiaries.
Furthermore, as far as the reporting is concerned, please focus more on the presentation of the progress in the implementation of the programmes at aggregate level (including the quantitative data and information on delays/ obstacles encountered considering the targets).

Section 1.3 - Specific mitigation measures:

In your reporting, please integrate also other risks, such as procedural delays, administrative capacity, contextual changes affecting the Specific Objectives, and indicate respective mitigation measures taken/envisaged.

Section 1.5 – Specific Actions:

In reference to the above recommendation, please consider any aspects (such as procedural delays, administrative capacity, context changes etc.) affecting the Specific Actions (SA) and the respective mitigation measures taken and therefore present the actual operational state of play during the reference period. This should also include any changes to the approved project timeline, any changes in indicators, issues with partnerships. Therefore, the descriptive part should aim to include all such elements (i.e. information on the main developments and achievements/ activities carried out during the reporting period, which is in addition to the quantified data included in the SA table).
Please also use the agreed SA references across the whole report, rather than the internal ones.
Furthermore, considering the lengthy procedures for signing project agreements under Specific Actions with beneficiaries, please consider if any modifications to the process could be implemented allowing a faster start of SA projects. You are kindly requested to discuss this with the desk officer, given the significant share of SA projects under the BMVI programme and the importance of the projects concerned.

[redacted]

[redacted]

Section 2 - Complementarity:

[redacted]

Section 3 - Implementation of the acquis:

[redacted]

Section 4 - Communication and visibility:

[redacted]

Section 5 - Enabling conditions and horizontal principles:

[redacted]

Section 6 – re. AMIF - Projects in or in relation to third countries:

[redacted]

Section 7 - Summary:

We welcome the clarity and quality of the summary, but would request you to consider the following two suggestions for improvement for future reports:

- more attention to be paid on the aggregate description of the progress in the programmes towards the targets and set milestones and information on concrete elements justifying the delays encountered.

- The wording regarding specific actions should underline the subject increasing their visibility.

[redacted] Electronically signed on 17/07/2025 18:40 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121