



# Boosting integration - start local

## EUROCITIES policy statement on AMF proposal

10 October 2018



Reception and early integration measures will be key priorities in the future. Clearly, the proper integration of migrants and refugees must be supported by more funding, yet public budgets are restricted and EU funds are not easily accessible for city authorities. The current Asylum Migration and Integration Fund (AMIF) has provided vital financial resources for cities, but it has its limitations. The new Asylum and Migration Fund (AMF) should address these key challenges, starting from the local level. EUROCITIES key messages for the new AMF Regulation<sup>1</sup> are:

- The newly introduced provisions emphasising the role of local authorities, and the actions implemented at local level, are an important step in the right direction.
- The thematic facility funding should be made easily and directly accessible to cities.
- City authorities should be consulted at all stages of the implementation of the AMF fund, putting partnership principle into practice.
- Coordination between actions and priorities funded under AMF and ESF+ is fundamental to avoid gaps between early and long-term integration at local level.

## Migration and integration are key priorities for cities

Cities are the main point of arrival of asylum seekers and we can deal with emergencies quicker and more flexibly than the national level. We, as the level of government closest to citizens, are in the best position to assess and identify needs and priorities in the field of migration and integration. Many cities across Europe hired extra staff, created reception and coordination centres, provided additional shelters and houses<sup>2</sup>, opened new services such as education and training,<sup>3</sup> in a context where they had been asked previously to cut public expenditure and reduce their staff.<sup>4</sup> Cities are also planning for the more long-term integration of newcomers through education, housing, training and employment measures.<sup>5</sup> Reception and early integration of migrants and refugees

---

<sup>1</sup> Proposal for a Regulation establishing the Asylum and Migration Fund - COM(2018) 471 final

<sup>2</sup> Amsterdam opened a refugee reception centre in August 2016, providing shelter to 1,000 people. In Athens, a temporary Housing Programme for refugees provided 320 apartments for accommodating 1,500 people. In Milan, the city opened a new first reception system that hosted 129,000 people since 2013. A new temporary asylum centre has been set up in Ghent, while Nuremberg supports conversion of former refugee shelters into regular flats.

<sup>3</sup> See EUROCITIES report Cities' Actions for the Education of Refugees and Asylum Seekers <https://bit.ly/2kHWRVG>

<sup>4</sup> Many examples of cities actions on integration are reported in the OCED report Working Together for Local Integration of Migrants and Refugees <https://bit.ly/2qGDssg>

<sup>5</sup> See EUROCITIES report on Labour Market Integration of Refugees and Asylum Seekers <https://bit.ly/2DFpNdK>.

arriving to Europe are key priorities for the years to come. Failing to do so would be detrimental for our societies and local communities.

We support the new Recital 17 of the AMF Regulation proposal. It recognises the 'crucial role' played by local authorities in the field of integration. It states that to facilitate the access of local authorities to EU funding, 'the Fund should facilitate the implementation of actions in the field of integration by local authorities', including through the use of the thematic facility and through a higher co-financing rate.

On the other hand, we regret that the Commission's proposal no longer defines a pre-established amount of funding per policy objective. It is only foreseen that funds for shared management will be allocated to member states using a different percentage weight per policy area.<sup>6</sup> However, there is no provision guaranteeing that the funding allocated is to be used for a specific policy area. More concretely these are our key considerations:

- We strongly support Recital 17 of the AMF Regulation as it explicitly recognises the key role of local authorities in integration.
- Funding received for integration should be spent for integration and member states obliged to use it according to the distribution criteria for the corresponding policy areas: asylum, migration and integration, and return. For us it is crucial that an adequate amount of funding is spent on migration and integration.

## Cities need direct access to migration and integration funding

City authorities should have better and direct access to the AMF to be able to better address needs and adapt the programmes to the local context.<sup>7</sup>

We agree with the creation of a fund for a thematic facility, managed by the Commission, that would be dedicated to different actions each year, depending on the priorities of the moment. We strongly endorse the proposal that the thematic facility should particularly support actions implemented at local level.<sup>8</sup> We recommend that a significant part of the funding is reserved for local authorities in the annual or multi annual programmes.

In addition, the higher co-financing rate for actions implemented by local authorities is a step in the right direction enabling cities with fewer resources to access AMF funding.<sup>9</sup>

---

<sup>6</sup> According to Annex I, to calculate the amount allocated to each member state, the area of asylum would count for 30%, legal migration and integration for 30%, and return for 40%. These percentages are only used to calculate the amount allocated, not to define the destination of the funding to the given policy area.

<sup>7</sup> This recommendation has been agreed by the Urban Agenda Partnership on Inclusion of Migrants and Refugees. The paper adopted by the Urban partnership on Inclusion is available at <https://bit.ly/2NOasvD>.

<sup>8</sup> Under Article 8.3 of the proposal, 40% of the total AMF financial envelope shall be allocated to a 'thematic facility' using shared, direct and indirect management. The thematic facility shall in particular, support actions falling under the implementation measure 2(b) of Annex II that are implemented by the local authorities (Article 9.6).

<sup>9</sup> Under Article 12.3 and Annex IV, whilst the general EU co-financing rate is set at 75%, the contribution from the Union budget may be increased to 90% for Integration measures implemented by local authorities.

The AMF regulation proposal emphasises in several places the importance of local level to achieve the policy objective of legal migration and integration.<sup>10</sup> To make these provisions effective, a significant part of the funding allocated to the member states under shared management should be reserved for actions implemented by local authorities.

Reporting and audit requirements are often very burdensome and discourage cities from applying for EU funding. We emphasise the importance of simplified application and reimbursement procedures meaning that the funds could support more actors' efforts, both among cities and in civil society. We recommend that:

- A significant part of the thematic facility must be dedicated to support actions implemented by local authorities for early integration.
- A significant part of the funding under shared management should be reserved for actions implemented by local authorities.
- We support the higher co-financing rate for actions implemented by local authorities, as it will facilitate cities with fewer resources to access AMF funding.
- We support the introduction of a simplified framework of rules for the funds management through a 'single rule book' approach.

## Cities should be essential partners in the management and implementation of AMF

Cities should have a say in deciding priorities and programming of the AMF funding. Decisions on the allocation of funds and selection of priorities are made by national or regional authorities. Within the current AMIF there is little or no involvement of local governments in the programming phases, as the EU regulations do not require AMIF responsible authorities to involve them in decision making about the selection of priorities and allocation of funds.<sup>11</sup>

Under the proposal for the new Common Provision Regulation, the partnership principle will apply also to the AMF fund.<sup>12</sup> EUROCITIES supports this partnership principle, requiring member states to involve local authorities at all stages of the fund implementation. We recommend that:

- The partnership principle must be mandatory in order to be meaningful for integration at the local level.
- City authorities must be engaged by the member states at all stages of the implementation of the AMF fund, making the partnership principle effective in practice. The European Commission should closely supervise the practical implementation of the partnership principle.

---

<sup>10</sup> Recital 17 and Article 2(b) of Annex II of the regulation proposal.

<sup>11</sup> Under the current AMIF Regulation, cities are not recognised as key partners by AMIF responsible authorities (see Art. 4 of AMIF Regulation 516/2014).

<sup>12</sup> Article 6 of the current proposal COM(2018) 375 final.

## Coordination and synergies between AMF and other funds must be ensured

Rules and priorities across different funds, such as ESF+ and ERDF, should be better coordinated and harmonised. According to Commission proposals, early measures of integration will remain under the new Asylum and Migration Fund, while medium and long-term integration measures will be mainly financed through the new European Social Fund (ESF+) and the European Regional Development Fund (ERDF). This change is a step in the right direction. However, some precautions are required for integration efforts to be consistent and to promote further complementarity and synergies between funds. We recommend that:

- Member states should define their priorities for AMF, ESF and ERDF in full cooperation with local governments.
- Rules for ESF+ and AMF programmes should be better aligned, to ensure coherent programming, management and monitoring requirements.
- Actions and objectives of early integration measures funded under the new AMF should be strongly coordinated with medium and long-term integration measures, funded under the new ESF+ and ERDF.
- The actions and priorities of the AMF decided each year should be coordinated with the ERDF and ESF+.
- The shared management funding implemented by Member States should not create gaps in integration policies between the short, medium and long-term interventions.

## Conclusion

Cities are playing a crucial role in the integration of migrants and refugees, however they have no voice on the allocation of funds and selection of priorities. The AMF should include local authorities among the key partners that have to be consulted at all stages. Cities face numerous obstacles to access EU integration funding. Therefore, part of the Thematic Facility under AMF should be reserved for and made directly available to cities to enable them to deal with their specific local needs related to reception and integration. We call for simpler rules, higher co-financing rate and to ensure coherence between integration funds.