

## SFC2021 Programme for AMIF, ISF and BMVI

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## 1. Programme strategy: main challenges and policy responses

Reference: points (a)(iii), (iv), (v) and (ix) Article 22(3) of Regulation (EU) 2021/1060 (CPR)

### INTEGRATED BORDER MANAGEMENT

The BMVI programme is implemented in the context of the Danish strategy for European Integrated Border Management (EIBM). Denmark adopted a new national EIBM strategy in 2024 as part of Multiannual strategic policy cycle for European integrated border management in accordance with article 8 of Regulation (EU) 2019/1896 on the European Border and Coast Guard (EBCG Regulation]. Denmark has also adopted a national capability development plan in accordance with the EBCG Regulation. .

### SITUATIONAL PICTURE

The pressure and level of threat at Denmark's borders is to some extent dependent on the developments at the EU's external borders, where a change in irregular migration movements or the level of security can lead to increased pressure at the Danish borders. The impact of the war in Ukraine is closely monitored. The Danish National Police have allocated resources to assessing the threats involved in secondary movements and providing updates of the development of the situation in Ukraine.

Although the influx of irregular migrants across the EU's external borders has dropped significantly since the crisis years of 2015 and 2016, there is still pressure, primarily sustained by geopolitical and economic factors in the EU's neighbouring regions. Irregular migration pressure has led to an increase in border-related crime, including human trafficking and smuggling, which especially is connected with the land border.

Denmark's geographical location and the general low risk of irregular migration via the external borders mean that the Danish authorities have a special focus on the border checks of persons crossing the external air border. The most relevant risks at the air borders are closely linked with the increasing number of travellers in the airports, including in particular the risk of abuse of documents and legal entry channels. Denmark has 24 airports, which are approved as external border crossing points. The majority of border crossings take place in the airports in Copenhagen and Billund, with Copenhagen accounting for the largest share. The four largest airports in Denmark, i.e. in Copenhagen, Billund, Aalborg and Aarhus accounted for most air traffic passengers. The Danish authorities have strengthened their focus on innovation and development of new tools and systems, including e-gates in airports.

The current situational picture also shows a stable situation at Denmark's external sea borders. The risk of irregular migration via the sea borders is considered low.

Denmark has no external land borders. The 68-kilometre border to Germany and the Øresund Bridge to Sweden constitute internal borders.

### FORECAST AS REGARDS LONG-TERM TRENDS UNTIL 2029

The pressure on Denmark's borders, including the internal border with Germany, will depend on the geopolitical situation in conflict areas and EU's neighbouring countries, the handling of irregular migration flows across EU's external borders and secondary migration flows through Europe, in particular via the Western Balkan route and by intra-Schengen flights from frontline Member States in the Mediterranean area. On the internal border with Sweden, the pressure is particularly affected by an increased threat from severe cross-border crime.

On the external borders, the number of non-Schengen passengers via the Danish airports and cruise ship passengers via the Danish ports is expected to increase significantly in the period until 2029. The implementation of the Entry/Exit System (EES) and other new large-scale EU IT systems on border control is ongoing with a sustained focus on the quality of border control.

Furthermore, the continued terrorist threat in the EU means that the police must maintain focus on continued profiling of travellers as well as implementation of systematic checks at the external borders. This dynamic situation implies that the police must be able to devote considerable resources to border control tasks at short notice at both the internal and external borders, including in other Member States through Frontex and also require enhanced cooperation between the national border management authorities.

Border management measures will be prioritized to meet the requirements of the evolving legislative

framework.

### THE FAROE ISLANDS AND GREENLAND

The Faroe Islands and Greenland are part of the Kingdom of Denmark. The agreement on the Accession of the Kingdom of Denmark to the Schengen Convention stipulates that the Agreement does not apply to the Faroe Islands or to Greenland. However, the provisions of the Nordic Passport Union mean that persons travelling between the Faroe Islands or Greenland and the Schengen area are not subject to border checks. As a result, the borders of the Faroe Islands and Greenland de facto constitute external borders. The agreement on Denmark's accession to the Schengen Convention stipulates that effective control and surveillance measures at the external borders of the Faroe Islands and Greenland are preconditions for Denmark's participation.

### STATE OF IMPLEMENTATION OF RELEVANT UNION ACQUIS AND ACTION PLANS

The most recent Schengen evaluation of Denmark took place in 2022. Implementation of recommendations is ongoing.

Frontex has carried out yearly vulnerability assessments of Denmark's external border management since 2017 resulting in several recommendations.

The implementation of new legal acts pertaining to the Schengen acquis is organised in an inter-agency steering group which is coordinated by the Ministry of Immigration and Integration. The steering group oversees the Danish implementation of the Entry/Exit System (EES), the Schengen Information Systems II (SIS II), and the European Travel Information and Authorization System (ETIAS). Full implementation of the two regulations establishing a framework for interoperability between EU information systems is also expected in accordance with the EU schedule.

The Danish authorities will continue working towards its full completion and the fulfilment of all statutory requirements stemming from EU regulations. This also concerns the following areas which are currently not planned to be covered by the BMVI support, including cooperation with the European Border and Coast Guard, including in relation to the national capability development plan and the future capability roadmap and the development of national component of European Border and Coast Guard including training of national staff as well as digitalisation of travel documents and facilitation of travel, including equipping border crossing points with the relevant technical capacity and related training activities.

### Implementation of the Pact on Migration and Asylum

After the adoption of the Pact on Migration and Asylum in May 2024 Denmark has worked to prepare for the new legislation and make sure the overall system is adapted in time in order to implement the new requirements as described in the National Implementation Plan (NIP).

Given the Danish opt-out as regards justice and home affairs, Denmark is obliged to implement those elements of the Pact that fall within the scope of the Schengen or Dublin acquis. Consequently, on 11 June 2024 Denmark notified the Council and the Commission its decision to implement the legal acts concerning AMMR, EURODAC and Crisis and the force majeure regulation in Danish law. Moreover, on 7 November 2024 Denmark notified the Council and the Commission its decision to implement the legal acts concerning the Regulation establishing a return border procedure, as well as the Screening Regulation in Danish law.

### VISA POLICY

Denmark's visa policy is conducted within the framework of the Common Visa Policy.

Visa applications are expected to increase in the wake of the COVID-19 pandemic from 165,260 in 2019 (and 31,882 in 2020) to 227,000 annual applications in 2029. It should be noted that the forecast is based on available information at this stage. New outbreaks of COVID-19 or similar events will naturally affect the level of applications at the end of the programming period.

In 2018, Denmark established an independent National ID Centre (NIDC) under the Ministry of Immigration and Integration. The primary task of the Danish National ID Centre is to advise and assist Danish authorities regarding questions of identity determination and ID control of foreign nationals. This task is performed using, among other things, technical examinations of affected documents in the centre's forensic laboratory, facial image comparison, fingerprint examination, and through analyses of

falsification trends and other ID-related issues.

The Danish National ID Centre has an expert team, which provides technical support to Danish diplomatic missions and underpins the missions' capacities within the area of security and control related to ID documents. The objective is to strengthen the identity determination and the control of ID documents of foreign nationals through technical support and through ID training.

Since 2019, the National ID Centre has deployed a dedicated ID attaché to the Danish embassy in Turkey in Ankara to assist the embassy and cooperate with Turkish authorities in the area of ID control.

The ID attaché in Ankara – alongside three regional attachés in Nairobi, Beirut, and Istanbul covering return and readmission-related topics – participate in network of Immigration Liaison Officers (ILOs) in third countries in line with the new ILO regulation.

#### THE DANISH IMMIGRATION SERVICE

According to Danish law, the competence to make decisions in visa cases is divided between the Danish Immigration Service and the Danish diplomatic and consular missions abroad.

The Danish diplomatic and consular missions are assigned with the competence to make decisions – including refusals – in visa cases which can be sufficiently elucidated locally. Appeals concerning decisions made by the Danish diplomatic and consular missions regarding refusal, annulment or revocation of a visa are processed by the Danish Immigration Service.

Visa cases, where there is a need for further investigations, are submitted to the Danish Immigration Service in order to sufficiently elucidate the cases before a decision is made.

#### STRATEGY OF THE BMVI PROGRAMME

The BMVI programme complements the Finance Act by providing funding for a limited number of strategic priorities.

The programme builds on the national programme under the Internal Security Fund (ISF) – borders and visa in the programming period 2014-2020 (approximately 24,000,000 Euros). The ISF programme provided funding for IT projects to ensure implementation of EES and ETIAS as well as the acquisition of the necessary hardware, including e-gates, in the Danish National Police. The ISF programme also provided funding for the establishment of the national ETIAS unit in the Danish Immigration Service. In keeping with the logic of the ISF programme, the BMVI programme is focused on key strategic priorities to avoid fragmentation of the available BMVI funds. This will help ensure results and impact in accordance with the relevant performance framework. At the same time, a focused BMVI programme will contribute to reducing administrative costs.

Specifically, the BMVI focuses on:

1. Contributions to Frontex
2. Implementation of recommendations from Schengen Evaluations and Frontex vulnerability assessments
3. Interoperability of large-scale IT systems
4. Visa policy

#### MANAGING AUTHORITY

The BMVI programme is coordinated by the Ministry of Immigration and Integration (Managing authority). The Management and Control System (MCSs) is based on the MCS developed for the ISF programme and the requirements in the Common Provisions Regulation (CPR). The administrative capacity of the Managing authority has been reinforced in view of the higher volume of funds in the BMVI programme and new requirements in the CPR Regulation. This inter alia concerns support for the accounting function and matters related to public procurement.

The performance of these tasks is funded by technical assistance (TA) under the BMVI programme.

The Managing authority introduced simplified cost options for staff costs towards the end of the ISF programming period. The model developed is available under the BMVI programme to help beneficiaries manage projects in a cost-efficient way. The standard rates of unit costs are available for e.g. project staff costs in relation to large-scale IT systems, project management costs, as well as staff costs covered by TA in the Managing authority.

#### SYNERGIES WITH OTHER EUROPEAN FUNDING INSTRUMENTS

Synergies with projects funded by the Customs Control Equipment Instrument (CCEI), which constitutes

the second instrument under the Integrated Border Management Fund, are not foreseen in connection with BMVI projects. Possible applications for CCEI support will be coordinated by the Ministry of Taxation. Synergies with Danish programmes under other EU funds covered by the CPR regulation are also not foreseen because these programmes do not include priorities related to integrated border management or visa policy. As a result, there is no risk of double funding.

## 2. Specific Objectives & Technical Assistance

Reference: Article 22(2) and (4) CPR

Selected	Specific objective or Technical assistance	Type of action
<input checked="" type="checkbox"/>	1. European integrated border management	Regular actions
<input checked="" type="checkbox"/>	1. European integrated border management	Pact specific action
<input checked="" type="checkbox"/>	1. European integrated border management	Specific actions
<input checked="" type="checkbox"/>	1. European integrated border management	Annex IV actions
<input type="checkbox"/>	1. European integrated border management	Operating support
<input type="checkbox"/>	1. European integrated border management	STS
<input type="checkbox"/>	1. European integrated border management	Emergency assistance
<input checked="" type="checkbox"/>	1. European integrated border management	ETIAS regulation Art. 85(2)
<input checked="" type="checkbox"/>	1. European integrated border management	ETIAS regulation Art. 85(3)
<input type="checkbox"/>	1. European integrated border management	Solidarity actions
<input checked="" type="checkbox"/>	2. Common visa policy	Regular actions
<input type="checkbox"/>	2. Common visa policy	Specific actions
<input checked="" type="checkbox"/>	2. Common visa policy	Annex IV actions
<input type="checkbox"/>	2. Common visa policy	Operating support
<input type="checkbox"/>	2. Common visa policy	Emergency assistance
<input checked="" type="checkbox"/>	TA.36(5). Technical assistance - flat rate (Art. 36(5) CPR)	
<input type="checkbox"/>	TA.37. Technical assistance - not linked to costs (Art. 37 CPR)	

## 2.1. Specific objective: 1. European integrated border management

### 2.1.1. Description of the specific objective

#### Implementation measures

(a) The improvement of border control in accordance with point (a) of Article 3(1) of Regulation (EU) 2019/1896

Denmark carries out effective, uniform and thorough control and surveillance of the external borders. Integrated border management with an active and holistic inter-agency cooperation is an essential tool for combating and detecting irregular migration and cross-border crime. The authorities' analysis-based approach safeguards the national interest in combating illegal migration and cross-border crime, while at the same time taking the necessary measures to prevent unreasonably long waiting time. Denmark strives to make border checks more efficient, while performing border checks in a consistent and thorough manner. The Danish authorities focus on innovation and development of new tools and systems as well as an effective utilisation of staff and resources. Furthermore, the Danish authorities will work towards reducing the the number of border crossing points, which is also mentioned as a strategic priority in the national European integrated border management (EIBM) strategy from 2024.

In addition, there is an increased focus on strengthening border surveillance as well as on improving inter-agency cooperation related to border management. The Danish National Police cooperate on a regular basis with Frontex, e.g. in contribution to strategic and operational activities, capacity building (e.g. training) and in the area of document security. To further enhance and support the cooperation with Frontex, the Danish National Police has since 2023 deployed a liaison officer to Frontex headquarters in Warsaw.

A National Coordination Centre (NCC) has been established at the Danish National Police. As of 26 June 2023, the Danish National Police has divided the National Coordination Centre into a front office with 24/7 function and a back office staffed within normal office hours. The staff in the NCC front office continuously updates the national situational picture 24/7. When establishing the NCC front and back office functions, it was ensured that the tasks are carried out in accordance with the EBCG regulation and the Schengen Borders Code. There is limited communication between the Royal Danish Navy responsible for the maritime border surveillance and the NCC. No regional or local coordination centers have been established at this point. The Danish National Police have attended Frontex trainings in the past and plan to attend future trainings based on availability from Frontex and the need for further training of staff. Priorities in the national EIBM strategy from 2024 relevant for the NCC include further strengthened inter-agency cooperation between the Danish National Police and Defence Command Denmark and the Danish Customs Agency, respectively, with the aim of strengthening the operational cooperation between the authorities and ensuring relevant analysis and information-sharing as well as development of a more comprehensive and integrated national situational picture.

The Danish police carry out immigration control throughout Denmark, including thematic control actions based on intelligence and analysis in cooperation with other authorities such as the Customs and Tax agencies.

. Strategic priorities in the national EIBM strategy from 2024 in the area of training covers strengthened training of staff, who carry out tasks in relation to border checks, border surveillance and return.

Fundamental rights standards are an integral part of policing and border management in Denmark and thus a highly prioritised area for the entire Danish police, not least when it comes to the training of new recruits and further specialised border control training. Knowledge of fundamental rights is therefore also an integral part of the curriculum and training programme at the Danish Police Academy.

Denmark's risk analysis model is based on the common standards in the Common Integrated Risk Analysis Model developed by Frontex. Further development of the national risk model to ensure full compliance with CIRAM is a strategic priority in the national EIBM strategy from 2024.

Cooperation with third countries is a key element of European IBM. In particular, the regulation 2019/1896 emphasises cooperation with neighbouring third countries and those third countries which have

been identified through risk analysis as being countries of origin or transit for illegal immigration.

Denmark supports projects in the area of border control capacity building through the Danish development aid.

Denmark's cooperation with third countries takes place in full compliance with fundamental rights.

Funding for border control activities is mainly provided in the Finance Act. The BMVI will not include actions under this implementation measure.

In 2025, the Commission approved a Danish proposal for the Specific Action relating to Financing of implementation of the Pact on Migration and Asylum. The funds under the Specific Action are expected to cover costs related to the implementation of the regulations on screening and Eurodac. As new requirements are introduced to ensure a better border and migration management, including a screening to improve national security and facilitate smooth and seamless procedures, Denmark needs to establish new screening facilities, train staff, and altogether ensure the system is fully equipped to handle the new requirements. Currently, Denmark does not have anything similar to the new screening process. However, the procedural steps included in the screening are, more or less, already performed in a slightly different manner during either a border check or during the processing of an asylum claim. Regarding the implementation of EURODAC, the Danish authorities are applying for funds related to the testing and development of national IT systems in order to integrate and utilise the EURODAC web solution in Denmark initially and potentially the development of a system-to-system solution for long term use. Part of this process involves securing the transfer of local case file types to the new EURODAC solution and ensuring integration between systems on the national and European level. On top of this comes ongoing maintenance costs.

Moreover, following the financial consequences of the supplementary agreements with the Schengen Associated Countries, Denmark received an additional amount in 2025. These funds will likewise be allocated to the implementation of the Pact and are expected to be used for staff costs (preparation and implementation), staff training (preparation and implementation), setting-up and development of Eurodac key functionalities, hardware/software equipment, development of IT systems (for EURODAC), Interoperability requirements.

Furthermore, to meet the requirements stemming from the Pact on Migration and Asylum for increased monitoring of fundamental rights and applying new safeguards, funding might be required for the setting-up and implementation of the independent monitoring mechanism as well as the recruitment and training of staff

(b) The development of the European Border and Coast Guard by providing support to national authorities responsible for border management to pursue measures related to capability development and common capacity building, joint procurement, the establishment of common standards and any other measures streamlining the cooperation and coordination between the Member States and the European Border and Coast Guard Agency;

Denmark wishes to show effective solidarity through a strong contribution to strengthening the EU's external borders in the light of the great challenges posed by irregular migration, cross-border crime and terrorism.

Denmark participates actively in Frontex cooperation.

The Danish National Police serve as National Frontex Point of Contact (NFPOC) and represent Denmark in the Agency's Management Board. Strategic priorities include contributions to Frontex operations and compliance with requirements and tasks under the EBCG regulation (2019/1896), including the mandatory Danish contributions to the Standing Corps. To further enhance and support the cooperation with Frontex, the Danish National Police has since 2023 deployed a liaison officer to Frontex headquarters in Warsaw.

Besides playing an important role in managing Denmark's external borders – for instance through surveillance of coastline and waterways – the Danish Ministry of Defence (MoD) delivers a substantial contribution through Frontex to the management of EU's external borders. Apart from personnel, the Danish MoD contributes patrol vessels, surveillance aircraft, and mobile thermal images equipment to

Frontex.

Funding related to Frontex contributions is mainly provided under the Finance Act. The BMVI programme complements this funding. Indicative actions, in line with annex IV to the BMVI regulation, include 3: the development of the European Border and Coast Guard Agency by providing support to national authorities responsible for border management to pursue measures related to common capacity building, joint procurement, the establishment of common standards and any other measures streamlining the cooperation and coordination between the Member States and the European Border and Coast Guard Agency. The actions will benefit from the higher co-financing rates for Frontex contributions in line with annex IV due to the high added value at the Union level.

Equipment purchases with the BMVI funds comply with technical standards set out by Frontex, and large-scale operating equipment for border management will be registered in the Technical Equipment Pool and made available for the Agency's deployment, in line with the requirements of the EBCG Regulation and Article 13 in the BMVI Regulation.

(c) the enhancement of inter-agency cooperation at national level among the national authorities responsible for border control or for tasks carried out at the border, and enhancing cooperation at Union level between the Member States, or between the Member States, on the one hand, and the relevant Union bodies, offices and agencies or third countries, on the other;

Denmark has set up a number of inter-agency structures to coordinate tasks in the field of border management, including the NCC.

The Danish National Police is responsible for the internal coordination with the local police districts and externally with Defence Command Denmark, the Danish Customs Agency and other relevant national border management authorities, Member States and Frontex.

Strategic priorities in national EIBM strategy from 2024 in relation to inter-agency cooperation include further strengthened cooperation between the Danish National Police and Defence Command Denmark and the Danish Customs Agency, respectively, with the aim of strengthening the operational cooperation and ensuring relevant analysis and information-sharing as well as development of a more comprehensive and integrated national situational picture.

Funding for inter-agency cooperation is mainly provided in the Finance Act. The BMVI will not include actions under this implementation measure. However, actions under implementation measure d) below could relate to EUROSUR.

(d) ensuring the uniform application of the Union acquis in relation to external borders, including through the implementation of recommendations from quality control mechanisms such as the Schengen evaluation mechanism in accordance with Regulation (EU) No 1053/2013, vulnerability assessments in accordance with Regulation (EU) 2019/1896 and national quality control mechanisms;

The implementation of some of the recommendations from the Schengen evaluation in 2022 is in progress.

The implementation of recommendations received from Frontex in connection with vulnerability assessments is in progress and handled by the relevant authorities with systematic reporting to Frontex in line with the process laid down in the Regulation (EU) 2019/1896 and the Common Vulnerability Assessment Methodology.

Funding for the implementation of recommendations from Schengen evaluations and Frontex vulnerability assessments is mainly provided in the Finance Act. The BMVI programme will include actions to ensure the implementation of key recommendations, including a reserve to ensure the implementation of recommendations from the 2022 Schengen evaluation of Denmark and vulnerability assessments during the programming period. Indicative actions, in line with annex III to the BMVI regulation, include 3(g): preparatory, monitoring, administrative and technical activities required to implement external border policies, including to strengthen the governance of the Schengen area by developing and implementing the evaluation mechanism, established by Regulation (EU) No 1053/2013

to verify the application of the Schengen acquis and Regulation (EU) 2016/399, including mission expenditure for experts of the Commission and the Member States participating in on-site visits and measures to implement recommendations issued following vulnerability assessments carried out by the European Border and Coast Guard Agency in accordance with Regulation (EU) 2019/1896.

(e) the setting up, operation and maintenance of large-scale IT systems pursuant to Union law in the area of border management, in particular SIS, ETIAS, the EES and Eurodac for border management purposes, including the interoperability of those large-scale IT systems and their communication infrastructure, and actions to enhance data quality and the provision of information;

Implementation of the Smart Borders Package has been the main priority in the Danish ISF – borders programme (2014-2020) with a particular focus on the Entry/Exit System (EES), the European Travel Information and Authorization System (ETIAS), and the Schengen Information System (SIS II). The BMVI programme will focus on interoperability (IO) among information systems.

The Danish authorities expect to adapt all existing or future applications supporting Danish authorities' access to the interoperability components and the central systems in order to fully apply the obligations and possibilities of the interoperability regulation. This could include the development of common national applications e.g. for the handling of links and identity data as a result of interoperability.

The funds allocated to IO in the BMVI will contribute to ensuring the full implementation of the IO regulations in Denmark, taking into account the fundamental rights implications of the use of large-scale IT systems. The Danish Ministry of Immigration and Integration is a competent authority in Denmark and will hold the following IO end user roles: ETIAS ESP User, SIS ESP user, EES ESP user, VIS ESP user. To leverage the user roles a total of 10 adjustments (gaps) to the national ICT landscape needs to be completed. The adjustments are in the existing national case management systems, development of a new technical solution developed to handle IO Business Use Cases and in the underlying data, integration and security layer.

On 13 September 2022, the Commission has approved a Danish proposal for the Specific Action - “Support to comply with the implementation of the relevant interoperability legal framework” under BMVI (Reference BMVI/2021/SA/1.5.4/007). The funds under the Specific Action are expected to cover costs related to the handling of yellow links in the Danish SIRENE office, analysis phase of the it-implementation of Interoperability in the Danish Ministry of Immigration and Integration, and preparation of end-users in the Danish Immigration Service and the Danish Return Agency.

On 29 July 2024, the Commission has approved a Danish proposal for the Specific Action - “Support to Member States for Smart Borders” under BMVI (Reference BMVI/2024/SA/1.5.1). The funds under the Specific Action are expected to cover costs related to the final implementation of the EES and ETIAS respectively at the Danish Immigration Service and the Danish National Police.

The BMVI programme will build on the lessons from the ISF programme and provide funding for the implementation of large-scale IT systems in the area of interoperability. Lessons learned include the use of standard rates of unit costs for staff costs in connection with IT projects and reinforced administrative capacity in the managing authority relating to public procurement.

Funding for the implementation of large-scale IT systems is mainly provided in the Finance Act. The BMVI programme will include actions to focusing on measures which aim to improve the interoperability of ICT systems. Indicative actions, in line with annex IV to the BMVI regulation, include 12: measures which aim to improve the interoperability of ICT systems. The actions will benefit from the higher co-financing rates due to the high added value at the Union level of measures which aim to improve interoperability.

(f) increasing capacity to render assistance to persons in distress at sea and supporting search and rescue operations in situations which might arise during a border surveillance operation at sea;

Funding for search and rescue operations is provided in the Finance Act. The BMVI programme will not include funding for actions under this implementation measure.

(g) support to search and rescue operations in the context of carrying out border surveillance at sea.

Funding for search and rescue operations and border surveillance at sea is provided in the Finance Act. The BMVI programme will not include funding for actions under this implementation measure.

Operational support

N/A

Financial instruments

N/A

Expected results

The programme is expected to ensure results as regards equipment registered in the technical equipment pool of the European Border and Coast Guard Agency and put at the disposal of the European Border and Coast Guard Agency. At the same time, the programme is expected to provide results in the area of interoperability and as regards addressed recommendations from Schengen evaluations and from vulnerability assessments.

## 2.1. Specific objective 1. European integrated border management

### 2.1.2. Indicators

Reference: point (e) of Article 22(4) CPR

Table 1: Output indicators

ID	Indicator	Measurement unit	Milestone (2024)	Target (2029)
O.1.1	Number of items of equipment purchased for border crossing points	number	0	0
O.1.1.1	of which number of Automated Border Control gates / self-service systems / e- gates purchased	number	0	0
O.1.2	Number of infrastructure maintained / repaired	number	0	0
O.1.3	Number of hotspot areas supported	number	0	0
O.1.4	Number of facilities for border crossing points constructed / upgraded	number	0	0
O.1.5	Number of aerial vehicles purchased	number	0	0
O.1.5.1	of which number of unmanned aerial vehicles purchased	number	0	0
O.1.6	Number of maritime transport means purchased	number	2	2
O.1.7	Number of land transport means purchased	number	0	0
O.1.8	Number of participants supported	number	0	860
O.1.8.1	of which number of participants in training activities	number	0	860
O.1.9	Number of immigration liaison officers deployed to third countries	number	0	0
O.1.10	Number of IT functionalities developed / maintained / upgraded	number	10	23
O.1.11	Number of large-scale IT systems developed / maintained / upgraded	number	0	1
O.1.11.1	of which number of large-scale IT systems developed	number	0	0
O.1.12	Number of cooperation projects with third countries	number	0	0
O.1.13	Number of persons who have applied for international protection at border crossing points	number	116	116

## 2.1. Specific objective 1. European integrated border management

### 2.1.2. Indicators

Reference: point (e) of Article 22(4) CPR

Table 2: Result indicators

ID	Indicator	Measurement unit	Baseline	Measurement unit for baseline	Reference year(s)	Target (2029)	Measurement unit for target	Source of data	Comments
R.1.14	Number of items of equipment registered in the Technical Equipment Pool of the European Border and Coast Guard Agency	number	0	number	2021	2	number	Frontex	
R.1.15	Number of items of equipment put at the disposal of the European Border and Coast Guard Agency	number	0	number	2021	2	number	Frontex	
R.1.16	Number of initiated / improved forms of cooperation of national authorities with the Eurosur National Coordination Centre (NCC)	number	0	number	2021	0	number	0	0
R.1.17	Number of border crossings through Automated Border Control gates and e-gates	number	0	share	2021	0	number	0	0
R.1.18	Number of addressed recommendations from Schengen Evaluations and from vulnerability assessments in the area of border management	number	0	number	2021	100	percentage	DK	Reference is made to the 2022 Schengen evaluation of Denmark
R.1.19	Number of participants who report three months	number	0	share	2021	860	number	0	The Danish Immigration

ID	Indicator	Measurement unit	Baseline	Measurement unit for baseline	Reference year(s)	Target (2029)	Measurement unit for target	Source of data	Comments
	after the training activity that they are using the skills and competences acquired during the training								Service expect 400 participants and the Danish Return Agency 130 participants in training activities under the IO SA. Additionally 180 is expected to be trained under the Smart Borders SA.
R.1.20	Number of persons refused entry by border authorities	number	0	number	2021	2,300	number	DK	The estimated target is based on a linear projection from the Danish National Police based on the years 2017-2019 (annual average of 444 persons).

## 2.1. Specific objective 1. European integrated border management

### 2.1.3. Indicative breakdown of the programme resources (EU) by type of intervention

Reference: Article 22(5) CPR; and Article 16(12) AMIF Regulation, Article 13(12) ISF Regulation or Article 13(18) BMVI Regulation

Table 3: Indicative breakdown

Type of intervention	Code	Indicative amount (Euro)
Intervention field	001.Border checks	10,888,577.36
Intervention field	002.Border surveillance - air equipment	0.00
Intervention field	003.Border surveillance - land equipment	0.00
Intervention field	004.Border surveillance - maritime equipment	0.00
Intervention field	005.Border surveillance - automated border surveillance systems	0.00
Intervention field	006.Border surveillance - other measures	0.00
Intervention field	007.Technical and operational measures within the Schengen area which are related to border control	5,917,634.50
Intervention field	008.Situational awareness and exchange of information	0.00
Intervention field	009.Risk analysis	0.00
Intervention field	010.Processing of data and information	0.00
Intervention field	011.Hotspot areas	0.00
Intervention field	012.Measures related to the identification and referral of vulnerable persons	50,000.00
Intervention field	013.Measures related to the identification and referral of persons who are in need of, or wish to apply for, international protection	50,000.00
Intervention field	014.European Border and Coast Guard development	6,767,114.09
Intervention field	015.Inter-agency cooperation - national level	0.00
Intervention field	016.Inter-agency cooperation - European Union level	0.00
Intervention field	017.Inter-agency cooperation - with third countries	0.00
Intervention field	018.Joint deployment of immigration liaison officers	0.00
Intervention field	019.Large-scale IT systems - Eurodac for border management purposes	7,000,000.00

Type of intervention	Code	Indicative amount (Euro)
Intervention field	020.Large-scale IT systems - Entry-exit System (EES)	1,006,289.15
Intervention field	021.Large-scale IT systems - European Travel Information and Authorisation System (ETIAS) - others	1,006,289.15
Intervention field	022.Large-scale IT systems - European Travel Information and Authorisation System (ETIAS) - Article 85(2) of Regulation (EU) 2018/1240	0.00
Intervention field	023.Large-scale IT systems - European Travel Information and Authorisation System (ETIAS) - Article 85(3) of Regulation (EU) 2018/1240	0.00
Intervention field	024.Large-scale IT systems - Schengen Information System (SIS)	0.00
Intervention field	025.Large-scale IT systems - Interoperability	14,349,243.33
Intervention field	029.Data quality and data subjects' rights to information, access to, rectification and erasure of,their personal data, and to the retriCTION of the processing thereof	0.00

## 2.1. Specific objective: 2. Common visa policy

### 2.1.1. Description of the specific objective

The BMVI programme builds on recent initiatives in the area of visa policy. At the same time, the programme provides support for the implementation of the new VIS regulation as well as projects to set up, operate and maintain large-scale IT systems in the area of the common policy on visas.

#### Implementation measures

(a) the provision of efficient and client-friendly services to visa applicants while maintaining the security and integrity of visa procedures, and fully respecting the human dignity and the integrity of applicants and visa holders in accordance with Article 7(2) of Regulation (EC) No 767/2008;

In order to make the handling of the visa application procedures faster and more flexible and to increase the quality of the case processing, a significant part of the visa process has been digitalized. The Schengen applications are submitted and paid by the applicant online (via the online application platform ApplyVisa, introduced in 2019), passports and supporting documents are handed in and scanned by the external service provider, VFS (ESP), and made accessible digitally enabling all visa case processing to be done digitally. As a result, only handing in the documents, biometrics and passport as well as the final step of printing the decision and returning it along with the passport need to take place physically on location.

In connection with the Commission's proposal regarding the digitalisation of the Schengen visa application process, the visa case processing system, the MFA's visa system UM-VIS, will need adaptation to the European online visa platform and the digitalisation of the visa sticker.

From February 2019-July 2020 the Ministry of Foreign Affairs of Denmark has implemented a partial regionalization of missions' visa case processing. Eight missions – Singapore, Ankara, London, Bangkok, Nairobi, Dubai, New York, and Guangzhou – have become visa hubs under the responsibility of posted consuls and taken over visa case handling from 17 missions that have become so-called visa spokes. The hub missions are responsible for all tasks related to the processing of visa applications, including consideration of applications, interviews, document control, cooperation with external service provider(s), decision-making and participation in local Schengen cooperation. The visa spokes are only responsible for printing visa stickers.

During spring 2022 all visa issuing missions in Schengen have become spoke missions and case processing is now taking place at the Danish embassy in London (hub).

The regionalisation of the visa case processing has been made possible due to the above-mentioned digitalisation of the online application and the submitted documents and passport made accessible to caseworkers digitally.

Funding for visa services and security is mainly provided in the Finance Act. The BMVI programme will reinforce the visa policy by providing funding for certain projects. Indicative actions, in line with annex III to the BMVI regulation, include 2(a) operating equipment and ICT systems required for the processing of visa applications and consular cooperation.

(b) support to Member States in issuing visas, including visas with limited territorial validity, as referred to in Article 25 of Regulation (EC) No 810/2009, issued on humanitarian grounds, for reasons of national

interest or because of international obligations;

The Danish Immigration Service is responsible for issuing visas, including visas with limited territorial validity, as referred to in Article 25 of Regulation (EC) No 810/2009, issued on humanitarian grounds, for reasons of national interest or because of international obligations. Funding is provided in the Finance Act. The BMVI programme will not include funding for this implementation measure.

(c) ensuring the uniform application of the Union acquis in relation to visas, including the further development and modernisation of the common policy on visas;

The Ministry of Foreign Affairs and the Danish Immigration Service conduct training courses to ensure compliance with the Union acquis on visas. The Ministry of Foreign Affairs conducts seminars for locally employed staff twice a year. Here, the participants will be taught different aspects of the Visa Code and apply their knowledge to various cases presented by the MFA. Once a year the Ministry of Foreign Affairs conducts courses for employees that are to be posted to Danish visa issuing missions.

Moreover, the MFA arranges ad hoc seminars (mainly online) with relevant Danish missions in relation to various aspects of the Visa Code and visa case processing in general. E.g. brush-up courses in refusals.

The above-mentioned training is not covered by the BMVI programme.

In connection with the implementation and roll-out of the new Smart Borders Package – mainly the Entry Exit System (EES) – the Ministry of Foreign Affairs will conduct a series of regional seminars and courses for the Danish missions abroad. The aim of the regional seminars and courses is to educate case workers in both the IT- and case processing aspects of the EES. The IT implementation of EES in the MFA's visa case processing system, UM-VIS, will be partly financed by the ISF program in the programming period 2014-2020. The training of case workers is not included in the ISF funding.

Funding for training is provided in the Finance Act. The BMVI will not include funding for training actions under this implementation measure.

Funding for projects to ensure the uniform application of the Union acquis on visas is provided in the Finance Act. The BMVI programme will include actions to ensure the implementation of recommendations from future Schengen evaluations of Denmark in the area of visa policy. Due to COVID-19, the 2022 evaluation in the area of visa policy has been postponed. Indicative actions, in line with annex III, include 2(g): preparatory, monitoring, administrative and technical activities, including to strengthen the governance of the Schengen area by developing and implementing the evaluation mechanism as established by Regulation (EU) No 1053/2013 to verify the application of the Schengen acquis, including mission expenditure for experts of the Commission and the Member States participating in on-site visits.

The MFA experiences a shortage of sticker printers and assesses that ordering sticker printers may be a challenge in the coming years (before the digitalisation of the visa sticker). This could result in the need to procure bespoke/specialised sticker printers in the future. Consequently, this increased expense could potentially be covered by the BMVI funds.

(d) the development of different forms of cooperation between Member States in visa processing; Denmark actively participates in local Schengen cooperation activities in third countries.

Funding for local Schengen cooperation is provided in the Finance Act. The BMVI will not include funding for actions under this implementation measure.

(e) the setting up, operation and maintenance of large-scale IT systems pursuant to Union law in the area of the common policy on visas, in particular the VIS, including the interoperability of those large-scale IT systems and their communication infrastructure, and actions to enhance data quality and the provision of information.

Denmark is in full compliance with current EU requirements on VIS. In addition, changes and adjustments are, on a continuous basis, implemented due to changes in the central interface of the VIS, new or amended EU-legislation, including the VIS Regulation, the Visa Code and the EES Regulation, national legislation, etc.

Funding relating to large-scale IT systems in the area of the common policy on visas is mainly provided in the Finance Act. The BMVI will complement it by providing funding for VIS recast. In addition, the programme will include funding for actions for national IT systems. Indicative actions, in line with annex III to the BMVI regulation, include 3(a) the development and upgrading of large-scale IT systems. This could include a project concerning the development and upgrading of the existing national visa application systems or a new system to enhance security.

Operational support

N/A

Financial instruments

N/A

Expected results

The programme is expected to ensure results in the area of digitalisation and as regards the number of addressed recommendations from Schengen evaluations in the area of the common visa policy

## 2.1. Specific objective 2. Common visa policy

### 2.1.2. Indicators

Reference: point (e) of Article 22(4) CPR

Table 1: Output indicators

ID	Indicator	Measurement unit	Milestone (2024)	Target (2029)
O.2.1	Number of projects supporting the digitalisation of visa processing	number	1	1
O.2.2	Number of participants supported	number	0	0
O.2.2.1	of which number of participants in training activities	number	0	0
O.2.3	Number of staff deployed to consulates in third countries	number	0	0
O.2.3.1	of which number of staff deployed for visa processing	number	0	0
O.2.4	Number of IT functionalities developed / maintained / upgraded	number	0	0
O.2.5	Number of large-scale IT systems developed / maintained / upgraded	number	1	1
O.2.5.1	of which number of large-scale IT systems developed	number	1	1
O.2.6	Number of infrastructure maintained / repaired	number	0	0
O.2.7	Number of real estates rented / depreciated	number	0	0

## 2.1. Specific objective 2. Common visa policy

### 2.1.2. Indicators

Reference: point (e) of Article 22(4) CPR

Table 2: Result indicators

ID	Indicator	Measurement unit	Baseline	Measurement unit for baseline	Reference year(s)	Target (2029)	Measurement unit for target	Source of data	Comments
R.2.8	Number of new / upgraded consulates outside the Schengen area	number	0	number	2021	0	number	0	
R.2.8.1	of which number of consulates upgraded to enhance client-friendliness for Visa applicants	number	0	number	2021	0	number	0	
R.2.9	Number of addressed recommendations from Schengen Evaluations in the area of the common visa policy	number	0	number	2021	100	percentage	DK	Reference is made to the 2022 Schengen evaluation of Denmark
R.2.10	Number of visa applications using digital means	number	0	share	2021	227,000	number	DK	All visa applications are through digital means. There were 165.260 applications in 2019 and 31.882 in 2020. Applications are expected to increase to 165.000 in 2024-2025 and 227.000 in 2029 (estimate from the MFA)
R.2.11	Number of initiated / improved forms of	number	0	number	2021	0	number	0	

ID	Indicator	Measurement unit	Baseline	Measurement unit for baseline	Reference year(s)	Target (2029)	Measurement unit for target	Source of data	Comments
	cooperation set up among Member States in visa processing								
R.2.12	Number of participants who report three months after the training activity that they are using the skills and competences acquired during the training	number	0	share	2021	0	number	0	

## 2.1. Specific objective 2. Common visa policy

### 2.1.3. Indicative breakdown of the programme resources (EU) by type of intervention

Reference: Article 22(5) CPR; and Article 16(12) AMIF Regulation, Article 13(12) ISF Regulation or Article 13(18) BMVI Regulation

Table 3: Indicative breakdown

Type of intervention	Code	Indicative amount (Euro)
Intervention field	001.Improving visa application processing	2,013,422.82
Intervention field	002.Enhancing the efficiency, client-friendly environment and security at consulates	0.00
Intervention field	003.Document security / document advisors	0.00
Intervention field	004.Consular cooperation	0.00
Intervention field	005.Consular coverage	0.00
Intervention field	006.Large-scale IT systems - Visa Information System (VIS)	3,020,134.23
Intervention field	007.Other ICT systems for visa application processing purposes	1,006,711.41
Intervention field	011.Issuance of visas with limited territorial validity	0.00
Intervention field	012.Data quality and data subjects' rights to information, access to, rectification and erasure of, their personal data, and to the restriction of the processing thereof	0.00

## 2.2. Technical assistance: TA.36(5). Technical assistance - flat rate (Art. 36(5) CPR)

Reference: point (f) of Article 22(3), Article 36(5), Article 37, and Article 95 CPR

### 2.2.1. Description

The BMVI programme will, in line with article 36 in the CPR regulation, support actions under technical assistance (TA), which may concern previous and subsequent programming periods, necessary for the effective administration and use of the BMVI funds, including for capacity building, as well as to provide financing for carrying out, inter alia, functions such as preparation, training, management, monitoring, evaluation, visibility and communication.

The TA funds will support actions in the Managing authority, taking into the account the reinforced administrative capacity through the involvement of the Financial Division as regards e.g. monitoring and control as well as the Legal Division in the area of public procurement. This will include staff costs based on the model of standard scales of unit costs developed towards the end of the ISF programme.

The TA funds could possibly also fund the work of the Audit Authority in line with article 36 in the CPR regulation.

## 2.2. Technical assistance TA.36(5). Technical assistance - flat rate (Art. 36(5) CPR)

### 2.2.2. Indicative breakdown of technical assistance pursuant to Article 37 CPR

Table 4: Indicative breakdown

Type of intervention	Code	Indicative amount (Euro)
Intervention field	001.Information and communication	50,000.00
Intervention field	002.Preparation, implementation, monitoring and control	2,658,997.09
Intervention field	003.Evaluation and studies, data collection	50,000.00
Intervention field	004.Capacity building	425,527.87

### 3. Financing plan

Reference: point (g) Article 22(3) CPR

#### 3.1. Financial appropriations by year

Table 5: Financial appropriations per year

Allocation type	2021	2022	2023	2024	2025	2026	2027	Total
Initial allocation		5,459,217.00	6,632,990.00	7,153,801.00	5,539,099.00	4,585,039.00	4,647,513.00	34,017,659.00
Mid-term review								
Thematic facility WPI			1,041,057.00					1,041,057.00
Thematic facility WPII				2,133,333.00		5,683,416.00	11,366,830.00	19,183,579.00
Thematic facility WPIII								
Total transfer (in)								
Non-Thematic facility transfer (in)								
Thematic facility WPII transfer (in)								
Total transfer (out)								
Non-Thematic facility transfer (out)								
Thematic facility WPII transfer (out)								
SACs contribution						1,008,823.00	1,008,823.00	2,017,646.00
Total		5,459,217.00	7,674,047.00	9,287,134.00	5,539,099.00	11,277,278.00	17,023,166.00	56,259,941.00

### 3.2. Total financial allocations

Table 6: Total financial allocations by fund and national contribution

Specific objective (SO)	Type of action	Basis for calculation Union support (total or public)	Union contribution (a)	National contribution (b)=(c)+(d)	Indicative breakdown of national contribution		Total (e)=(a)+(b)	Co-financing rate (f)=(a)/(e)
					Public (c)	Private (d)		
European integrated border management	Regular actions	Total	7,821,074.12	2,607,024.71	2,607,024.71		10,428,098.83	74.9999999760%
European integrated border management	Specific actions	Total	2,994,707.54	332,745.28	332,745.28		3,327,452.82	90.0000000601%
European integrated border management	Annex IV actions	Total	20,134,228.18	2,237,136.46	2,237,136.46		22,371,364.64	90.0000000179%
European integrated border management	ETIAS regulation Art. 85(2)	Total	0.00	0.00	0.00		0.00	
European integrated border management	ETIAS regulation Art. 85(3)	Total	0.00	0.00	0.00	0.00	0.00	
European integrated border management	Pact specific action	Total	16,085,137.74	1,787,237.53	1,787,237.53		17,872,375.27	89.9999999832%
Total European integrated border management			47,035,147.58	6,964,143.98	6,964,143.98	0.00	53,999,291.56	87.1032678785%
Common visa policy	Regular actions	Total	6,040,268.46	2,013,422.82	2,013,422.82		8,053,691.28	75.0000000000%
Common visa policy	Annex IV actions	Total	0.00	0.00	0.00		0.00	
Total Common visa policy			6,040,268.46	2,013,422.82	2,013,422.82		8,053,691.28	75.0000000000%
Technical assistance - flat rate (Art. 36(5) CPR)			3,184,524.96				3,184,524.96	100.0000000000%
Grand total			56,259,941.00	8,977,566.80	8,977,566.80	0.00	65,237,507.80	86.2386423045%

### 3.3. Transfers

Table 7: Transfers between shared management funds<sup>1</sup>

Transferring fund	Receiving fund						
	AMIF	ISF	ERDF	ESF+	CF	EMFAF	Total
BMVI							

<sup>1</sup>Cumulative amounts for all transfers during programming period.

Table 8: Transfers to instruments under direct or indirect management<sup>1</sup>

Instrument	Transfer Amount
	0.00

<sup>1</sup>Cumulative amounts for all transfers during programming period.

#### 4. Enabling conditions

Reference: point (i) of Article 22(3) CPR

Table 9: Horizontal enabling conditions

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
1. Effective monitoring mechanisms of the public procurement market	Yes	<p>Monitoring mechanisms are in place that cover all public contracts and their procurement under the Funds in line with Union procurement legislation. That requirement includes:</p> <p>1. Arrangements to ensure compilation of effective and reliable data on public procurement procedures above the Union thresholds in accordance with reporting obligations under Articles 83 and 84 of Directive 2014/24/EU and Articles 99 and 100 of Directive 2014/25/EU.</p>	Yes	<p>Der henvises til:</p> <p>Den ansvarlige myndigheds hjemmeside om udbud: <a href="https://www.kfst.dk/udbud/">https://www.kfst.dk/udbud/</a></p> <p>Udbudsdirektivets implementering i dansk ret ved udbudsloven: <a href="https://www.retsinformation.dk/eli/lta/2015/1564">https://www.retsinformation.dk/eli/lta/2015/1564</a></p>	<p>Alle tilskud fra fondene gives på betingelse af, at støttemodtageren overholder udbudsreglerne samt de overordnede principper om gennemsigtighed, ligebehandling og sparsommelighed.</p> <p>Forvaltningsmyndigheden kontrollerer, at støttemodtagerne har opfyldt gældende udbudsregler, inden tilskud udbetales, herunder krav i CPR-forordningen. I den forbindelse skal alle projekter ved anmodninger om udbetaling afreportere data om eventuelle eksterne indkøb inkluderet i de støtteberettigede udgifter, der anmodes om udbetaling på baggrund af.</p> <p>Implementering og opretholdelse af udbudsloven på nationalt plan varetages af Konkurrence- og Forbrugsstyrelsen, herunder art. 83 og 84 i direktiv 2014/24/EU og art. 99 og 100 i direktiv 2014/25/EU. Alle bestemmelser er fuldt implementeret i dansk ret og danner</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
					<p>basis for udmøntningen af udbudsreglerne i Danmark, herunder også indkøb foretaget under fondene.</p> <p>Se bilag vedr. grundforudsætninger for supplerende begrundelse.</p>
		<p>2. Arrangements to ensure the data cover at least the following elements:</p> <p>a. Quality and intensity of competition: names of winning bidder, number of initial bidders and contractual value;</p> <p>b. Information on final price after completion and on participation of SMEs as direct bidders, where national systems provide such information.</p>	Yes	www.udbud.dk	<p>Konkurrence- og Forbrugerstyrelsen har bl.a. via platformen www.udbud.dk mulighed for at oplyse om den generelle dokumentation for gennemførelse af offentlige indkøb.</p> <p>Ud over den data, der er tilgængelig via de nationale konkurrencemyndigheders databaser, sørger forvaltningsmyndigheden selv for at indhente dokumentation relateret til gennemførte udbud under fondene.</p> <p>Støttemodtagere skal kunne dokumentere det fulde kontrolspor for den vindende tilbudsgiver, herunder kontrakter og komplet tilbudsmateriale. Dertil kræves overblik over tilbudsevaluering samt dokumentation for indkomne tilbud. Data om eksterne</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
					<p>indkøb omfatter bl.a. data om indkøbets karakter, udgiftens størrelse, dato for indkøbet, leverandørens CVR-nummer osv.</p> <p>Forvaltningsmyndigheden foretager løbende overvågning af samlede kontraktværdier mhp. at sikre overholdelse af udbudslovens bestemmelser, herunder ligebehandling blandt tilbudsgivere.</p> <p>Se bilag vedr. grundforudsætninger for supplerende begrundelser.</p>
		<p>3. Arrangements to ensure monitoring and analysis of the data by the competent national authorities in accordance with article 83 (2) of directive 2014/24/EU and article 99 (2) of directive 2014/25/EU.</p>	<p>Yes</p>	<p><a href="http://www.kfst.dk">www.kfst.dk</a> &amp; <a href="http://www.kfst.dk/udbud/vejledninger-og-analyser/">www.kfst.dk/udbud/vejledninger-og-analyser/</a></p>	<p>Den danske implementering vurderes at være i overensstemmelse med direktivet, og kriteriet vurderes opfyldt.</p> <p>Konkurrence- og Forbrugerstyrelsen er ressortansvarlig for udbudsreglerne og er derfor den myndighed, der overvåger anvendelsen heraf. Konkurrence- og Forbrugerstyrelsen overvåger løbende udbudsområdet og offentliggør både vejledninger og analyser på hjemmesiden. Overvågningen gælder også indkøb foretaget under fondene, da</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
		4. Arrangements to make the results of the analysis available to the public in accordance with article 83 (3) of directive 2014/24/EU and article 99 (3) directive 2014/25/EU.	Yes	www.kfst.dk & https://statensindkob.dk/	<p>Udbudslovens regler også her finder anvendelse.</p> <p>Den danske implementering vurderes at være i overensstemmelse med direktivet, og kriteriet vurderes opfyldt.</p> <p>Konkurrence- og Forbrugerstyrelsen overvåger generelt markedet for offentlige udbud, da de er underlagt de almindelige bestemmelser i Udbudsloven. Der stilles generelt information om overvågning til rådighed for offentligheden, og information kan vederlagsfrit hentes via hjemmesiden. Herudover udarbejder Statens Rådgivningsenhed diverse værktøjer for alle, der arbejder med indkøb i staten.</p> <p>Oplysninger om overholdelse er både indeholdt i Danmarks årlige monitoreringsrapport, men er også oplyst Kommissionen i forbindelse med deltagelsen i Europa-Kommissionens arbejdsgruppe EXPP (Commission Government Expert Group on Public Procurement).</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
		5. Arrangements to ensure that all information pointing to suspected bid-rigging situations is communicated to the competent national bodies in accordance with Article 83(2) of Directive 2014/24/EU and Article 99(2) of Directive 2014/25/EU.	Yes	www.kfst.dk &  <a href="https://naevneneshus.dk/start-din-klage/klagenaevnet-for-udbud/aarsberetninger/">https://naevneneshus.dk/start-din-klage/klagenaevnet-for-udbud/aarsberetninger/</a>	Den danske implementering vurderes at være i overensstemmelse med direktivet, og kriteriet vurderes opfyldt. Konkurrence- og Forbrugerstyrelsen er ressortansvarlig for udbudsreglerne og er derfor den myndighed, der overvåger anvendelsen heraf. Herudover overvåger Rigsrevisionen også overholdelsen af reglerne. Der er generelt mulighed for at klage til Ombudsmanden, Ankestyrelsen og Klagenævnet for Udbud. Sidstnævnte er den officielle klageinstans for EU-udbud i Danmark - klagenævnets afgørelser og praksis sætter retning for Forvaltningsmyndighedens arbejde  Forvaltningsmyndighederne har opsat faste procedurer for kontroller af støttemodtagernes overholdelse af gældende udbudsregler, inden tilskud udbetales, herunder også håndtering af potentielt svig. Konkrete mistanker kommunikerer videre til rette myndigheder af forvaltningsmyndigheden.
3. Effective	Yes	Effective mechanisms are in place to	Yes	Lov om Institut for Menneskerettigheder –	Overvågningsudvalget godkender

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
application and implementation of the Charter of Fundamental Rights		<p>ensure compliance with the Charter of Fundamental Rights of the European Union ('the Charter') which include:</p> <p>1. Arrangements to ensure compliance of the programmes supported by the Funds and their implementation with the relevant provisions of the Charter.</p>		<p>Danmarks Nationale Menneskerettighedsinstitution:  <a href="https://www.retsinformation.dk/eli/lta/2012/553">https://www.retsinformation.dk/eli/lta/2012/553</a></p> <p>Lov om forbud mod forskelsbehandling på arbejdsmarkedet:  <a href="https://www.retsinformation.dk/eli/lta/2017/1001">https://www.retsinformation.dk/eli/lta/2017/1001</a></p> <p>Lov om ligestilling af mænd og kvinder:  <a href="https://www.retsinformation.dk/eli/lta/2020/1147">https://www.retsinformation.dk/eli/lta/2020/1147</a></p> <p>Lov om lige løn til mænd og kvinder:  <a href="https://www.retsinformation.dk/eli/lta/2019/156">https://www.retsinformation.dk/eli/lta/2019/156</a></p>	<p>udvælgelsesprocedure for operationer. Procedurer for udvælgelse skal være ikkediskriminerende, inklusive og gennemsigtige, og de udvalgte operationer skal være i overensstemmelse med de horisontale principper. Overvågningsudvalget kan fremsætte henstillinger til forvaltningsmyndigheden.</p> <p>Danske myndigheder er forpligtet til at overholde den Europæiske Unions Charter om Grundlæggende Rettigheder. Forvaltningsmyndighederne er gennem den danske lovgivning (særligt offentlighedsloven og forvaltningsloven) med til at gennemføre Chartret om grundlæggende rettigheder. Charteret skal overholdes i programmering, gennemførelse og evaluering.</p> <p>Overholdelsen af Chartret sikres gennem adgang til uafhængig og upartisk domstolskontrol med myndighedernes forvaltning, jf. grundloven § 63. Alle administrative afgørelser kan indbringes for de nationale domstole.</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
					<p>Danske forvaltningsmyndigheder vurderes at have et ligestillingsaspekt i alle deres politikker og aktiviteter.</p> <p>Se bilag vedr. grundforudsætninger for supplerende begrundelser.</p>
		<p>2. Reporting arrangements to the monitoring committee regarding cases of non-compliance of operations supported by the Funds with the Charter and complaints regarding the Charter submitted in accordance with the arrangements made pursuant to Article 69(7).</p>	<p>Yes</p>	<p>Lov om Ligebehandlingsnævnet  <a href="https://www.retsinformation.dk/eli/lta/2020/1147">https://www.retsinformation.dk/eli/lta/2020/1147</a>  <a href="https://ast.dk/naevn/ligebehandlingsnaevne/t/alder-handicap-kon-etnisk-oprindelse-seksuel-orientering-ovrige-grunde">https://ast.dk/naevn/ligebehandlingsnaevne/t/alder-handicap-kon-etnisk-oprindelse-seksuel-orientering-ovrige-grunde</a></p>	<p>Overvågningsudvalget vil som et fast punkt til hvert møde blive orienteret af forvaltningsmyndigheden om alle tilfælde vedrørende manglende overholdelse af Chartret. Udvalget vil i den forbindelse få oplysninger om overtrædelsens karakter og forvaltningsmyndighedens eller andre relevante myndigheders/organers vurdering, aktioner og afgørelse i sagen, hvis en sådan foreligger. Foreligger alene en klage endnu uden afgørelse, vil udvalget blive orienteret herom samt nærmere proces for afgørelse.</p> <p>Såfremt forvaltningsmyndigheden konstaterer en overtrædelse af Chartret, men hvor der ikke foreligger en konkret klage, orienteres Overvågningsudvalget herom, herunder hvordan overtrædelsen forventes håndteret af</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
					<p>forvaltningsmyndigheden.</p> <p>Forvaltningsmyndigheden henviser konkrete tilfælde af diskrimination til Ligebehandlingsnævnet, hvortil den forurettede kan klage over direkte eller indirekte forskelsbehandling.</p> <p>Se bilag vedr. grundforudsætninger for supplerende begrundelser.</p>
<p>4. Implementation and application of the United Nations Convention on the rights of persons with disabilities (UNCRPD) in accordance with Council Decision 2010/48/EC</p>	<p>Yes</p>	<p>A national framework to ensure implementation of the UNCRPD is in place that includes:</p> <p>1. Objectives with measurable goals, data collection and monitoring mechanisms.</p>	<p>Yes</p>	<p>De centrale love, som beskytter personer med handicap mod diskrimination i Danmark er:</p> <ul style="list-style-type: none"> <li>- Lov om forbud mod forskelsbehandling på grund af handicap uden for arbejdsmarkedet <a href="https://www.retsinformation.dk/eli/lta/2018/688">https://www.retsinformation.dk/eli/lta/2018/688</a></li> <li>og</li> <li>- Lov om forbud mod forskelsbehandling på arbejdsmarkedet. <a href="https://www.retsinformation.dk/eli/lta/2017/1001">https://www.retsinformation.dk/eli/lta/2017/1001</a></li> </ul>	<p>Social- og Ældreministeriet er koordinerende ministerium for FN's handicapkonvention i Danmark og kontaktpunkt i centraladministrationen for forhold vedrørende gennemførelsen af konventionen i samarbejde med alle relevante ministerier og relevante organisationer på området.</p> <p>Definitionen af handicap i forskelsbehandlingslovene bygger på direktiv 2000/78 og på EU-Domstolens definition af ”handicap” i relation til direktivet.</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
					<p>Princippet om sektoransvar sætter, i samspil med Social- og Ældreministeriets koordinerende rolle, rammen om den danske implementering.</p> <p>Dette indebærer, at enhver offentlig myndighed, der udbyder en ydelse, en service eller et produkt, også er ansvarlig for, at ydelsen er tilgængelig for personer med handicap. Denne struktur sætter således rammen om dansk implementering af UNCRPD Artikel 9's grundlæggende princip om tilgængelighed.</p> <p>Se bilag vedr. grundforudsætninger for supplerende begrundelser.</p>
		<p>2. Arrangements to ensure that accessibility policy, legislation and standards are properly reflected in the preparation and implementation of the programmes.</p>	<p>Yes</p>	<p>Lov om Ligebehandlingsnævnet  <a href="https://www.retsinformation.dk/eli/lta/2020/1147">https://www.retsinformation.dk/eli/lta/2020/1147</a>  <a href="https://ast.dk/naevn/ligebehandlingsnaevnet/alder-handicap-kon-etnisk-oprindelse-seksuel-orientering-ovrige-grunde">https://ast.dk/naevn/ligebehandlingsnaevnet/alder-handicap-kon-etnisk-oprindelse-seksuel-orientering-ovrige-grunde</a></p>	<p>Overvågningsudvalget godkender udvælgelsesprocedure for operationer. Procedurer for udvælgelse skal være ikkediskriminerende, inklusive og gennemsigtige, og de udvalgte operationer skal være i overensstemmelse med de horisontale principper. Overvågningsudvalget kan fremsætte henstillinger til forvaltningsmyndigheden.</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
					<p>Forvaltningsmyndigheden sikrer i implementeringen af programmerne, at program-hjemmesiden og alle dokumenter, herunder ansøgningsmateriale, er tilgængeliggjort i overensstemmelse med lov om webtilgængelighed, som er den danske implementering af EU-direktivet om webtilgængelighed.</p> <p>Se bilag vedr. grundforudsætninger for supplerende begrundelser.</p>
		<p>3. Reporting arrangements to the monitoring committee regarding cases of non-compliance of operations supported by the Funds with the UNCRPD and complaints regarding the UNCRPD submitted in accordance with the arrangements made pursuant to Article 69(7).</p>	<p>Yes</p>	<p>De centrale love, som beskytter personer med handicap mod diskrimination i Danmark er:</p> <ul style="list-style-type: none"> <li>- Lov om forbud mod forskelsbehandling på grund af handicap uden for arbejdsmarkedet <a href="https://www.retsinformation.dk/eli/lta/2018/688">https://www.retsinformation.dk/eli/lta/2018/688</a></li> <li>og</li> <li>- Lov om forbud mod forskelsbehandling på arbejdsmarkedet. <a href="https://www.retsinformation.dk/eli/lta/2017/1001">https://www.retsinformation.dk/eli/lta/2017/1001</a></li> </ul>	<p>Overtrædelser af konventionen skal indberettes til overvågningsudvalget via forvaltningsmyndigheden.</p> <p>Forvaltningsmyndigheden vil én gang årligt orientere overvågningsudvalget om tilfælde af overtrædelser. Udvalget vil i den forbindelse få oplysninger om sagens karakter og forvaltningsmyndighedens reaktion.</p> <p>Forvaltningsmyndigheden henviser konkrete tilfælde af diskrimination til Ligebehandlingsnævnet, hvortil den forurettede kan klage.</p>

Enabling condition	Fulfilment of enabling condition	Criteria	Fulfilment of criteria	Reference to relevant documents	Justification
					<p>En klage kan i hele programperioden indgives til forvaltningsmyndigheden på flere måder. Hvis en fysisk eller juridisk person ønsker at klage, kan dette gøres ved personligt fremmøde, telefonisk henvendelse (61 98 40 00), ved email (uim@uim.dk) eller ved brev til Udlændinge- og Integrationsministeriet, Slotsholmsgade 10, 1216 København.</p> <p>Klageren kan orientere sig på Udlændinge- og Integrationsministeriets hjemmeside, hvor kontaktoplysningerne ligeledes fremgår.</p> <p>Se bilag vedr. grundforudsætninger for supplerende begrundelser.</p>

## 5. Programme authorities

Reference: point (k) of Article 22(3) and Articles 71 and 84 CPR

Table 10: Programme authorities

Programme Authority	Name of the institution	Contact name	Position	Email
Managing authority	Division for International Cooperation on Migration, Ministry of Immigration and Integration	Morten Larsen Nonboe	Project coordinator	mln@uim.dk
Audit authority	National Audit Office (Rigsrevisionen)	Jan Arne Nielsen	Auditor	jan@rigsrevisionen.dk
Body which receives payments from the Commission	Financial Division, Ministry of Immigration and Integration	Haleh Golestani- Madani	Head of Unit	hgm@uim.dk

## 6. Partnership

Reference: point (h) of Article 22(3) CPR

In accordance with article 8(1) of the CPR regulation, the Managing authority will consult a partnership in accordance with the institutional and legal framework in Denmark.

The partnership will be involved in the preparation, implementation and evaluation of the BMVI programme in accordance with article 8(2) of the CPR regulation.

The partnership will include the key actors in the field of integrated border management, including:

- Ministry of Justice
- Danish National Police (under the Ministry of Justice)
- Ministry of Defence
- Ministry of Immigration and Integration
- The Danish Immigration Service (under the Ministry of Immigration and Integration)
- The Ministry of Taxation

Key actors in the field of visa policy include the Ministry of Foreign Affairs and the Ministry of the Immigration and Integration, including the Danish Immigration Service.

In addition, the partnership will include relevant bodies representing civil society.

The Managing Authority will, in accordance with article 38 in the CPR regulation, set up a committee to monitor the implementation of the programme ('monitoring committee') within 3 months of the date of notification to the Member State concerned of the decision approving the programme. The monitoring committee is expected to resemble the current steering group for the 2014-2020 ISF programme.

The following public authorities are expected to be represented in the committee.

- Ministry of Immigration and Integration (Managing authority)
- Danish Immigration Service
- National ID Centre
- Ministry of Justice
- National police
- Ministry of Defence
- Ministry of Foreign Affairs
- Ministry of Finance
- Data Protection Agency

With reference to the programme amendment in November 2025, the distribution of the additional funds

under the Pact Specific Action was shaped through the close and active involvement of the Pact Secretariat and the Monitoring Committee, whose contributions were essential to the preparation process. The Monitoring Committee was likewise formally consulted through written procedure on the two forms, which together constituted the Danish proposal.

## 7. Communication and visibility

Reference: point (j) of Article 22(3) CPR

The Managing Authority and beneficiaries will ensure that projects comply with the rules on visibility in the CPR regulation.

Objectives and targets will be the visibility of EU support in connection with all relevant projects, including the use of the emblem of the European Union. To the extent relevant, the Managing Authority will ensure communication to Union citizens on the results of the programme.

Information on the BMVI programme, including a list of selected operations, will be accessible on the website of the Ministry of Immigration and Integration. In addition, the information will be available on a single website portal providing access to all EU programmes in Denmark which is being developed by the Ministry of Industry, Business and Financial Affairs.

The Managing authority will participate in the communication network in relation to the support from the EU Funds. The network in Denmark will be organised by a communication coordinator in the Ministry of Industry, Business and Financial Affairs which is responsible for the Danish programmes under the European Regional Development Fund and the European Social Fund Plus.

In accordance with table 2.2.2., 50,000 euros have been allocated to communication activities as part of the technical assistance funds in the Managing authority. Possible indicators for monitoring and evaluation purposes include: number of press releases, number of publications on projects funded by the BMVI programme, number of social media posts.

8. Use of unit costs, lump sums, flat rates and financing not linked to costs

Reference: Articles 94 and 95 CPR

Intended use of Articles 94 and 95 CPR	Yes	No
From the adoption, the programme will make use of reimbursement of the Union contribution based on unit costs, lump sums and flat rates under the priority according to Article 94 CPR	<input type="checkbox"/>	<input checked="" type="checkbox"/>
From the adoption, the programme will make use of reimbursement of the Union contribution based on financing not linked to costs according to Article 95 CPR	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Appendix 1: Union contribution based on unit costs, lump sums and flat rates

### A. Summary of the main elements

Specific objective	Estimated proportion of the total financial allocation within the specific objective to which the SCO will be applied in %	Type(s) of operation covered		Indicator triggering reimbursement (2)		Unit of measurement for the indicator triggering reimbursement	Type of SCO (standard scale of unit costs, lump sums or flat rates)	Amount (in EUR) or percentage (in case of flat rates) of the SCO
		Code(1)	Description	Code(2)	Description			

(1) This refers to the code in Annex VI of the AMIF, BMVI and ISF Regulations

(2) This refers to the code of a common indicator, if applicable

Appendix 1: Union contribution based on unit costs, lump sums and flat rates

B. Details by type of operation

C. Calculation of the standard scale of unit costs, lump sums or flat rates

1. Source of data used to calculate the standard scale of unit costs, lump sums or flat rates (who produced, collected and recorded the data, where the data is stored, cut-off dates, validation, etc.)

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2. Please specify why the proposed method and calculation based on Article 94(2) CPR is relevant to the type of operation.

3. Please specify how the calculations were made, in particular including any assumptions made in terms of quality or quantities. Where relevant, statistical evidence and benchmarks should be used and, if requested, provided in a format that is usable by the Commission.

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4. Please explain how you have ensured that only eligible expenditure was included in the calculation of the standard scale of unit cost, lump sum or flat rate.

5. Assessment of the audit authority(ies) of the calculation methodology and amounts and the arrangements to ensure the verification, quality, collection and storage of data.

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## Appendix 2: Union contribution based on financing not linked to costs

### A. Summary of the main elements

Specific objective	The amount covered by the financing not linked to costs	Type(s) of operation covered		Conditions to be fulfilled/results to be achieved triggering reimbursement by the Commission	Indicators		Unit of measurement for the conditions to be fulfilled/results to be achieved triggering reimbursement by the Commission	Envisaged type of reimbursement method used to reimburse the beneficiary(ies)
		Code(1)	Description		Code(2)	Description		

(1) Refers to the code in Annex VI of the AMIF, BMVI and ISF Regulations.

(2) Refers to the code of a common indicator, if applicable.

## B. Details by type of operation

### Appendix 3

#### Thematic facility (Article 11 AMIF Reg., Article 8 BMVI Reg., Article 8 ISF Reg.)

Procedure reference		Programme version		Status	Accept/Decline date	Comments
C(2022)8993 - 12 Dec 2022 - 3		3.0		Accepted	5 Nov 2025	
Specific objective	Modality	Type of intervention	Union contribution	Pre-financing rate	Description of the action	
1. European integrated border management	Pact specific action		16,085,137.74		<p>Under Specific Action BMVI/2025/SA/Pact, and in relation to SO1, funding will contribute to several building blocks of the Common Implementation Plan for the Pact on Migration and Asylum, in particular:</p> <ul style="list-style-type: none"> <li>- Building Block 1 ‘A common migration and asylum information system: Eurodac’, by                             <ul style="list-style-type: none"> <li>o supporting staff costs and training of staff handling Eurodac;</li> <li>o setting-up and development of Eurodac key functionalities;</li> <li>o developing IT systems for Eurodac for border management purposes;</li> <li>o supporting Eurodac’s interoperability with the other EU information systems;</li> <li>o measures relating to hardware/software equipment for Eurodac.</li> </ul> </li> <li>- Building Block 2 ‘A new system to manage migration flows at the EU external borders’, by                             <ul style="list-style-type: none"> <li>o supporting staff costs and training of staff involved in screening;</li> <li>o measures to meet the requirements for the ‘adequate capacity’ in terms of infrastructure, including related facilities and equipment for screening purposes;</li> <li>o developing IT systems for screening purposes, taking into account the hardware/software equipment needs involved;</li> <li>o supporting the provision of written guidance for persons being screened and related translation costs.</li> </ul> </li> <li>- Building Block 6 ‘A fair and efficient system: making the new responsibility rules work’, by:                             <ul style="list-style-type: none"> <li>o updating relevant IT systems to ensure information flow from screening to the following procedures.</li> </ul> </li> <li>- Building Block 9 ‘New safeguards for applicants for international protection and vulnerable persons, and increased monitoring of fundamental rights’, by                             <ul style="list-style-type: none"> <li>o setting-up and implementing the independent monitoring mechanism for fundamental rights;</li> <li>o supporting the recruitment and training of staff involved in the new safeguards.</li> </ul> </li> </ul>	
TA.36(5). Technical assistance - flat rate (Art. 36(5) CPR)			965,108.26		Technical Assistance for the Specific Action in support of the implementation of the Pact on Migration and Asylum	

Procedure reference		Programme version			Status	Accept/Decline date	Comments
C(2022)8993 - 12 Dec 2022 - 2		2.0			Accepted	29 Oct 2024	
Specific objective	Modality	Type of intervention	Union contribution	Pre-financing rate	Description of the action		
1. European integrated border management	Specific actions		2,012,578.30		BMVI/2024/SA/1.5.1: Lot 1: preparation at the national level for the entry into operation of the Entry/Exit System (EES) and the European Travel Information and Authorisation System (ETIAS). This includes adaptations to the national systems connected to or used in relation with the EES and/or the ETIAS, adaptation to infrastructure or premises related to the EES and/or the ETIAS operation, the procurement of material and equipment, and services. Lot 2: changes to the SIRENE Bureaux Case management system related to the implementation and operation of ETIAS. This includes the development and implementation of national processes and IT solutions, as well as national procedures, handbooks, and training. The specific action provides a flexibility option that consists in the possibility to transfer all or part of the allocation for Lot 2 (EUR 500,000.00, including Technical Assistance) to Lot 1, on condition that the Member State confirms that activities under Lot 2 will be fully carried out and that the costs will be covered by the national budget or other actions financed from the BMVI programme. Denmark has decided to make use of this possibility.		
TA.36(5). Technical assistance - flat rate (Art. 36(5) CPR)			120,754.70		TA		

Procedure reference		Programme version			Status	Accept/Decline date	Comments
C(2022)3163 - 19 May 2022 - 1		1.1			Accepted	24 Apr 2023	
Specific objective	Modality	Type of intervention	Union contribution	Pre-financing rate	Description of the action		
1. European integrated border management	Specific actions		982,129.25		BMVI/2021/SA/1.5.4/007 - Support to comply with the implementation of the relevant interoperability legal framework' under BMVI. The objective of this Specific Action is to support Schengen countries to comply with the implementation of the interoperability legal framework. The action has two aspects: 1) preparing the end-users of EU IT system for handling properly the information on identities contained in other systems as a result of interoperability and 2) extending the capacity of the SIRENE offices to resolve yellow links during the period that makes the Multiple Identity Detector (MID) operational.		
TA.36(5). Technical assistance - flat rate (Art. 36(5) CPR)			58,927.75		TA		

## DOCUMENTS

Document title	Document type	Document date	Local reference	Commission reference	Files	Sent date	Sent by
Programme amendment (Reference HOME-Funds/2025/10)	Supplementary Information	10 Feb 2026	Programme amendment	Ares(2026)2075254	Programme amendment (Reference HOME-Funds/2025/10)	24 Feb 2026	Djurhuus, Eydbjørn
Performance Methodology	Supplementary Information	24 Feb 2026	Performance Methodology	Ares(2026)2075254	Performance Methodology	24 Feb 2026	Djurhuus, Eydbjørn
Programme snapshot 2021DK65BVPR001 4.1	Snapshot of data before send	24 Feb 2026		Ares(2026)2075254	Programme_snapshot_2021DK65BVPR001_4.1_da_en.pdf Programme_snapshot_2021DK65BVPR001_4.1_da.pdf	24 Feb 2026	Djurhuus, Eydbjørn