EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

Directorate F – Borders, Migration and Security in Member States II
F.4 – Finland, Sweden, Denmark, Poland, Czechia, Slovakia, Lithuania, Estonia, Latvia

Brussels
HOME.F.4/[redacted] rsonal data

Subject: Observations on Poland's AMIF annual performance report
CCI: 2021PL65AMPR001

Dear Mr [redacted]ta

According to Article 35(1) of Regulation (EU) 2021/1147, the Commission received on 16 February 2026 the annual performance report for the Member State programme of Poland under AMIF for the accounting year covering the period 1 July 2024 – 30 June 2025.

Following the assessment of the report, we would like to make some observations on its content. Please find our main observations in the annex to this letter in accordance with Article 35(3) of Regulation (EU) 2021/1147.

No formal resubmission is requested.

Yours sincerely,

[redacted]

Enclosure: Observations on the Annual Performance Report submitted in 2026 – AMIF – Poland

c.c.: [redacted]

[redacted]
Ministry of the Interior and Administration
Stefana Batorego, 5, 02-591 Warsaw
fundusze.kontakt@mswia.gov.pl

Observations on the Annual Performance Report submitted in 2026 – AMIF – Poland

General:

Please continue your efforts to speed up programme implementation, monitoring closely progress of contracting and implementation of activities especially under SO1 and SO2 in view of full and timely absorption of the EU funds.

Please refer to the Revised Background Note on the Annual Performance Report, which was sent on 26 January 2024 (ref. Ares (2024)613788). There is an improvement in reporting observed in comparison to the previous years, however several elements require your due attention when working on future APRs, as per the included observations.

As regards overall reporting:

- Please pay due attention to structure information 'for each specific objective' as the template explicitly requires (sections 1.1, 1.2). Mixing information across objectives makes it difficult to assess progress and issues for individual specific objectives
- Please ensure the consistency when reporting, in EUR, referring to the total programme allocation where relevant
- Please provide more quantitative data to complement qualitative descriptions (e.g. in section 1.3 (mitigation measures), section 3 (EU acquis)). This will increase the analytical value of the report.

Section 1.1 - Progress in the implementation of the programme:

- Please include in future reporting, critical assessment of the delays/difficulties.
- Please provide more information on underachieved indicators, as well as explanation for the overachieved indicators (including on the achieved levels, e.g. R3.6 showing achievement of 20 000 against a 2029 target of 1 325 (i.e. 1 509% overachievement) or R.3.6 (number of returnees voluntarily returned): target = 2,125, achieved = 9,814), describing also mitigation measures in case slow progress or underachievement of indicators.
- Please recheck and revise the upcoming Transmission of Data (ToD), as data seems to be uploaded incorrectly, and assure consistent reporting between APRs and ToDs.
- Please pay due attention to the indicators currently at the value zero and provide necessary explanation in the next reporting period.
- Furthermore, comparison of TOD 202506 and TOD 202512 for the indicator O.2.2 (number of local and regional authorities supported to implement integration measures) the value has decreased from 4 to 0 (reduction of 4, or 100.0%). Please provide clarification on the reason for these reductions.

Section 1.3 - Specific mitigation measures

- Please include information on amounts of re-directed funds to other activities. This will facilitate more detailed assessment on impact of the CICs call difficulty on the overall implementation of the integration activities/strategy.

- In view of the critical assessment of the delays/ difficulties encountered, please include explanation on mitigation measures planned and undertaken also in view of indicator's achievement.
- Please consider also other aspects of risks, such as procedural delays, administrative capacity, context changes etc. This was partially addressed by the case of SO2 call's difficulties, but nonetheless this context should be considered further for the future reporting.
- Please ensured that the target requirement for integration is maintained, including when considering any shift of funds towards enforcement-related activities (forced and voluntary returns).

Section 1.5 – Specific Actions:

- Please include information on the code of the SA, allocated in the notification letter, also in the descriptive part of the section.
- Please provide information on the issues affecting the AMIF/2023/SA/1.2.1 SA including:
  (1) explanation on significant delays to the original planning (to the initial phases of implementation) and mitigation measures implemented,
  (2) adjustments to the action implemented (in line with exchanges with DG HOME) and the status of implementation per site (explaining why the implementation was delayed for all the sites),
  (3) progress in indicators and explanation of mitigation measures that were applied to speed up achievement of indicators.
- Please provide information on the issues affecting the SA AMIF/2024/SA/3.3.1 SA including:
  (1) on any delays and mitigation measures,
  (2) modification to the action (in line with DG HOME recommendations) and the realisation in practice,
  (3) progress in indictors and explanation of mitigation measured that were applied to speed up achievement of indicators.
- Please devote more attention to critical assessment of activities implemented under all SAs, i.e. actual achievements and failures/difficulties, any deviations from plan (including timeline extension/delay).

Section 5 - Enabling conditions and horizontal principles:

- [redacted]

Section 7 - Summary:

Please aim to better reflect overview of the state of implementation of the programme, including progress towards the targets and set milestones and information on concrete elements contributing to any overall delays.

[redacted]

[redacted]