

2. GENERAL PRINCIPLES

Specific actions will be implemented by one or more Member States participating in the Fund via funding received in addition to the allocation under their Fund programmes.

Funding for specific actions is added to the Member States' programme by means of a programme amendment. That additional funding is earmarked for the specific action concerned and shall not be used for other actions in the Member State's programme, except in duly justified circumstances and as approved by the Commission through the amendment of the programme.

Whereas the regular EU co-financing rate under the Member States' programmes will not exceed 75% of total eligible expenditure, projects implemented under specific actions may benefit from an increased co-financing rate of up to 90% of total eligible expenditure.

The specific action must be implemented by the Member States in accordance with the AMIF ⁽²⁾ Regulation and the Common Provisions Regulation (CPR) ⁽³⁾. This includes compliance with fundamental rights.

As regard the value added tax ("VAT") eligibility regime, Article 64 (1)(c) of the CPR provides that VAT is not eligible, except:

- (i) "for operations the total cost of which is below EUR 5 000 000 (including VAT);
- (ii) for operations the total cost of which is at least EUR 5 000 000 (including VAT) where it is non-recoverable under national VAT legislation".

3. CALL FOR EXPRESSION OF INTEREST

3.1. Indicative Budget available

The indicative amount envisaged for this call AMIF/2026/SA/2.4.1. is **EUR 10 million**.

The requested amount (i.e., the Union contribution to the Member State's AMIF programme under the Specific Action):

- should not be lower than EUR 1 000 000.00 per application.
- should not be higher than EUR 2 500 000.00 per application.

⁽²⁾ Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund.

⁽³⁾ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

3.2. Background for the specific action

The EU economy faces labour shortages and relies significantly on third-country national (TCN) workers in certain sectors. Legally residing and irregular TCNs are disproportionately represented in high-risk sectors across Member States. They are more frequently affected by exploitation, trafficking in human beings, labour law infringements, undeclared work and breaches of occupational, health and safety (OSH) rules than nationals. Seasonal third-country workers and TCNs staying irregularly are the most exposed to situations of vulnerability. Preventing such situations of vulnerability is essential for the well-functioning of legal pathways, to ensure the integration of third-country nationals residing in the EU and to fight against irregular migration, which are all essential components of a comprehensive approach to migration.

3.2.1. EU legal and policy framework

The European Commission's [political guidelines 2024-2029](#) set the priorities to boost the EU's competitiveness and manage migration effectively and fairly under the comprehensive framework created by the [Pact on Migration and Asylum](#). The guidelines underline the need to “act to ensure that migrants are not exploited in the EU labour market and have good working conditions”. The [Quality Jobs Roadmap](#) focuses on strengthening the enforcement of labour rights of all workers, amongst other objectives. [The European Asylum and Migration Management Strategy](#) stresses the need to step up the fight against illegal employment and abuse of third-country workers in the EU underlining that illegal employment is among the main drivers of illegal migration and needs to be tackled more effectively, particularly in the sectors more exposed to those risks.

The Commission is launching this call together with implementation reports of the Employers Sanction Directive and the Seasonal Workers Directive. The **Employers Sanction Directive** ⁽⁴⁾ aims to prevent and respond to illegal employment of irregularly staying migrants, by sanctioning their employers and establishing safeguards to protect their rights, including through mechanisms to claim outstanding wages, facilitate complaints and the possibility to issue temporary residence permits to victims of particularly exploitative working conditions and minors. The **Seasonal Workers Directive** ⁽⁵⁾ aims to provide easily accessible pathways for seasonal work through fair and transparent rules for the admission of third-country nationals to the EU to meet labour demand legally and thus reduce irregular migration. It also aims to ensure decent working and living conditions by providing equal treatment rights, a right to adequate accommodation, enforcement mechanisms, and safeguards to better protect third-country seasonal workers from exploitation.

⁽⁴⁾ Directive 2009/52/EC of the European Parliament and of the Council of 18 June 2009 providing for minimum standards on sanctions and measures against employers of illegally staying third-country nationals: <https://eur-lex.europa.eu/eli/dir/2009/52/oj/eng>

⁽⁵⁾ Directive 2014/36/EU of the European Parliament and of the Council of 26 February 2014 on the conditions of entry and stay of third-country nationals for the purpose of employment as seasonal workers: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014L0036>

The two Directives form part of a set of measures taken by the EU to effectively tackle irregular migration and illegal employment of TCNs and enhance the protection of legally employed third-country workers. Other measures include enhanced cooperation with third countries, integrated management of operational borders, an effective return policy and reinforced legislation⁽⁶⁾ and strategy to combat trafficking in human beings⁽⁷⁾.

3.2.2. *Current challenges and gaps*

It is essential for the EU to prevent labour law infringements, illegal employment, trafficking in human beings for the purpose of labour exploitation and particularly exploitative working conditions, not only to protect TCN workers, regardless of their status, but also to ensure a level-playing field in the European labour market and among business operators. Ensuring adequate working conditions for legally residing TCN workers is also essential to present legal migration as a credible tool to improve the EU's competitiveness, to foster cooperation with partner countries on migration management and pave the way for the successful integration of third-country nationals into EU societies.

TCNs rarely use complaints and legal redress mechanisms to enforce their rights. Despite intensified inspections by national authorities, protection efforts remain insufficient for TCN workers. This is particularly evident in certain labour-intensive sectors where risks of labour law infringements and exploitation, undeclared work and trafficking in human beings remain high, such as seasonal agriculture, domestic and care work, construction and hospitality.

More specifically, the report on the implementation of the Employers Sanctions Directive found that in 2021-2024, while Member States have strengthened risk assessment methodologies in inspections planning, leading to more targeted inspections in high-risk sectors, and a higher number of proceedings opened against infringing employers compared to previous reporting periods, there are discrepancies on how the legislation is applied across the concerned Member States, including on the application of sanctions. Moreover, the findings indicate persisting data gaps, notably concerning the number of claims introduced by migrant workers, the issuance of temporary residence permits and the number of actual back-payments obtained. Vulnerable irregular migrants are often insufficiently informed of their rights, whilst effective access to and use of complaint mechanisms remains limited. The report on the implementation of the Seasonal Workers Directive⁽⁸⁾ found that while overall, Member States have stepped up their efforts to ensure employers' compliance, the provision of information on rights, obligations and access to complaint procedures for seasonal workers still needs improvement, especially

⁽⁶⁾ Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (OJ L, 2024/1712, 24.6.2024, ELI: <http://data.europa.eu/eli/dir/2024/1712/oj>).

⁽⁷⁾ Communication from the Commission to the European Parliament, The Council, The European Economic and Social Committee and the Committee of the Regions on the EU Strategy on Combatting Trafficking in Human Beings 2021- 2025 (COM/2021/171 final) and the new EU Strategy on Combatting Trafficking in Human beings planned for adopted 2026 (Q3).

⁽⁸⁾ Report from the Commission to the European Parliament and the Council on Directive 2014/36/EU on the conditions of entry and stay of third-country nationals for the purpose of employment as seasonal workers.

in employer-driven admission procedures where authorities are not in direct contact with the worker. Complaint and legal redress mechanisms are not sufficiently used by seasonal workers in case of abuses. Monitoring, inspections and sanction mechanisms often remain insufficient.

Strengthening the capacities of labour inspectorates and the cooperation among labour market actors, including economic and social partners, employers, employment services, and labour inspectorates, is essential to ensure adequate protection of migrant workers' rights and to prevent trafficking in human beings for labour exploitation and particularly exploitative working conditions of both legally residing and irregular TCNs. Civil society organisations, including migrant associations, play an important complementary role in outreach, awareness-raising and helping migrants accessing their rights.

3.2.3. Complementarity and sustainability

The actions to be financed under this call should be complementary to any actions that Member States may finance under the AMIF 2021-2027 Programmes or other EU funding instruments, such as the ESF+.

The proposals should describe how the sustainability of the measure will be ensured after the finalisation of the project and how the project would complement other sources of funding, if relevant.

Moreover, with reference to the investments on staffing/services, the proposals should refer to the measures to be put in place to ensure the sustainability of the foreseen interventions at national level after the end of the action. To this end, proposals will need to outline the cooperation and active participation of all the national administrations and/or institutions benefitting from it, from the preparation to the implementation phase.

3.2.4. Minimum requirements for the proposals

The call invites Member States that face challenges in protecting migrant workers' rights, including seasonal workers, while fighting illegal employment of irregularly staying third-country nationals, to launch initiatives improving their national situation.

The proposals should be aligned with any existing national plan and strategy in relation to the protection of migrant workers' rights, particularly exploitative working conditions, illegal employment of irregularly staying third-country nationals and countering trafficking in human beings for labour exploitation. They should be embedded in a whole-of-government approach that includes inter-agency cooperation and the involvement of local and regional authorities, civil society and social and economic partners.

In particular, Member States should refer to their National Asylum and Migration Strategies and to include existing or planned measures to counter illegal employment and step up the enforcement of the Directives 2009/52/EC and 2014/36/EU. They should also outline their plans to counter particularly exploitative working conditions, including measures addressing trafficking in human beings for labour exploitation.

The application should describe the baseline situation, the national plans and strategies concerned and the expected results. The challenges described need to be justified with supporting information, including (but not limited to) data (including estimates) and

qualitative information of the extent of undeclared work, legal and illegal employment of third country nationals in specific risk sectors, including posted third country nationals.

The proposals should include a description about steps to be taken to ensure sustainability after the end of the project.

The Commission encourages the preparation of applications in a multi-stakeholder approach, namely with the involvement of national and local authorities, civil society and social partners (trade unions, employers' associations).

The proposals should consider the existing EU legislative framework, guidance and manuals (e.g. from the Fundamental Rights Agency (FRA) ⁽⁹⁾, the European Labour Authority (ELA) ⁽¹⁰⁾, and the EU Anti-Trafficking Hub ⁽¹¹⁾) concerning actions to support the protection of TCN workers and fight against illegal employment, and build on good practices in other Member States, if appropriate, including those mentioned in the implementation reports of Directives 2009/52/EC and 2014/36/EU.

For proposals selected, Member States are expected to participate in monitoring and dissemination activities, such as:

- Collection of information and data on project activities (participation of project beneficiaries in questionnaires, information and awareness-raising campaigns, studies).
- Workshops where Member States' specific actions would be presented and discussed with the aim of disseminating best practices in the Member States, including in specific high-risk sectors.
- Report on the implementation of the action and discuss the outputs in the Irregular Migration Expert group on the Employers Sanctions Directive, the Contact Group on Legal Migration, the European Platform to enhance cooperation in tackling undeclared work and/or other relevant EU fora (such as the Labour Migration Platform).

3.3. Scope and purpose of the specific action

The objective of this specific action is to:

- (1) better protect the rights of third-country national workers in the EU, including seasonal third-country workers;
- (2) fight against the illegal employment of irregularly staying third-country nationals.

This call targets in particular Member States where TCN workers are employed in sectors where risks of labour law infringements, particularly exploitative working conditions and

⁽⁹⁾ <https://fra.europa.eu/en/publication/2024/workplace-inspectors-training-manual>

⁽¹⁰⁾ <https://www.ela.europa.eu/en/news/new-guide-empowers-workplace-inspectors-combat-labour-exploitation-eu>

⁽¹¹⁾ EU Anti-trafficking Hub Study on the concept of trafficking in human beings for the purpose of labour exploitation

undeclared work remain high, such as seasonal work, as well as agriculture, domestic and care work, construction, transport and hospitality.

The activities described below are meant to be consistent with the findings of the reports on the implementation of the Employers Sanctions Directive and the Seasonal Workers Directive. The activities financed under this call can include, but are not restricted to, the following:

- Information provision and awareness-raising for TCN workers and employers in high-risk sectors:
 - Develop and disseminate multilingual information materials and channels (e.g. mobile apps, digital portals, hotlines, “rights vans” and peer mediators) to ensure TCN workers are informed of their employment and residence-related rights, complaint mechanisms, and access to justice.
 - Conduct targeted awareness-raising campaigns for employers and workers.
 - Support trade unions, equality bodies and civil society organisations to provide tailored legal advice and representation to TCN workers.

- Legal aid and psychosocial support to TCN workers in high-risk sectors:
 - Provide open legal advice and psychosocial support near seasonal work clusters, including trauma-informed counselling and interpretation services.
 - Support the development of training curricula for lawyers, trade union representatives, mediators and inspectors on cultural mediation, trauma-informed interviewing, and equal-treatment obligations.
 - Pilot initiatives to facilitate the inclusion of TCN workers into trade unions and social dialogue structures.

- Targeted inspections and enforcement:
 - Capacity building measures to enhance national labour inspectorates’ risk-based and rights-focused inspections in sectors and regions at risk of illegal employment and labour exploitation.
 - Specialised training for labour inspectors and law enforcement authorities on detecting cases of illegal employment, severe exploitation, and trafficking in human beings for the purpose of labour exploitation, as well as on the rights of TCNs in irregular situations.
 - Establish or reinforce multi-agency cooperation frameworks among inspectorates, law enforcement, migration authorities, equality bodies, social partners, and prosecutors, including regional or cross-border coordination mechanisms, to further improve a risk-management-based enforcement of the relevant EU acquis.
 - Enhance the use of joint and concerted inspections (i.e. involving authorities of at least two Member States).
 - Support national labour inspectorates through training or capacity building, and provision of expertise, including interpretation/cultural mediation.
 - Promote the use of the training manual aimed at labour inspectorates prepared by FRA in 2024, also taking advantage as appropriate of the

practical exercises on the manual prepared by FRA in 2025 ⁽¹²⁾, through seminars and training sessions, as well as its translation.

- Improving access to complaint and redress mechanisms:
 - Develop or upgrade safe and accessible complaint channels including by implementing firewalls, anonymous and digital options with case-tracking and multilingual support, which ensures that reporting labour law breaches does not automatically trigger immigration enforcement, in line with national law.
 - Facilitate simplified and remote administrative procedures for wage recovery and legal representation, including for returned workers.

- Strengthening data collection, monitoring and coordination:
 - Support Member States in improving systematic, disaggregated data collection on inspections, complaints, sanctions and temporary residence permits.
 - Develop or upgrade digital tools (e.g. national reporting portals) for automated reporting, visualisation, and analysis.
 - Reinforce inter-ministerial coordination mechanisms, establish a function of national coordinator focusing on the employment of irregularly staying third country nationals or designate national contact points for monitoring and reporting on the implementation of the relevant legislation (e.g. Employers Sanctions Directive, Seasonal Workers’ Directive).
 - Facilitate outreach and information exchange through cooperation with consulates, visa centres, recruitment agencies and seasonal work hubs.

3.4. Expected results following the call

The aim of the specific action is to finance four to ten proposals aimed at protecting third-country workers’ rights, including of seasonal workers, while fighting against illegal employment of irregularly staying TCNs.

The proposals are expected to lead to tangible, and when feasible, quantified improvements in the protection of TCN workers’ rights in the EU, regardless of their status, including:

- (1) Increased awareness among workers and employers of legal employment conditions and complaint mechanisms;
- (2) Stronger and better-coordinated inspection and enforcement systems, thereby reducing the incidence of labour law infringements, particularly exploitative working conditions of third-country nationals and illegal employment of irregularly staying TCNs;
- (3) Improved access to justice and redress for TCN workers affected by labour law infringements and particularly exploitative working conditions.

⁽¹²⁾ [How workplace inspectors can protect third-country workers' rights - Training manual | European Union Agency for Fundamental Rights.](#)

The proposals should provide figures and, if appropriate, qualitative indications, including in the form of targets, for:

- the number and nature of information and awareness-raising campaigns;
- the number and content of trainings/seminars carried out;
- the number of TCN workers reached during the project's activities, including, when appropriate, per sector;
- the number of officials/labour inspectors and third-party organisations (civil society, social partners) involved;
- improvements in the quantity or quality of complaints mechanisms.

The proposals should also indicate how these activities are expected to affect the overall national capacity to counter labour law infringements, particularly exploitative working conditions and illegal employment of TCNs and to improve their access to information.

Overall, the action should contribute to reducing protection and enforcement gaps by enabling Member States to take targeted measures in line with their specific situations.

Considering the approaching end of the 2021-2027 financial period and the nature of the projects involving partnerships and potentially public procurement procedures, we draw the attention of the Managing Authorities to the need to ensure close supervision of the activities by the beneficiaries so that the timeline in the applications is respected, in line with the eligibility rules, and the selected projects will be concluded before 31 December 2029.

4. PROCEDURE FOR APPLICATION

4.1. Admissibility and assessment aspects

All EU Member States participating in the AMIF are eligible.

Each Member State may submit **one application only**.

DG HOME will assess the proposals submitted by the Member States.

To be considered admissible, a proposal must:

1. be submitted within the deadline below to the AMIF specific actions functional mailbox HOME-AMIF-SPECIFIC-ACTIONS@ec.europa.eu ;
2. consist of the official AMIF/2026/SA/2.4.1. Application Form attached to this note together with its annexes, which must be readable and complete (all fields necessary for assessment are filled in);
3. be submitted and signed by the Managing Authority on behalf of the entity in the Member State responsible for the implementation of the specific action;
4. contain a written confirmation by the Member State to participate in the monitoring activities organised by the Commission, in case of selection.
5. identify a project beneficiary (an entity) responsible for the implementation of the specific action in the Member State (in the lead for the action) without excluding the possibility for other entities to be involved in the implementation of the specific action as co-beneficiaries.

DG HOME will assess admissible proposals based on the following criteria:

A. Relevance and content (40 points –minimum score 20 points):

1. Definition of the national situation and degree to which the Member State concerned has specific needs in line with the requirements of the call (section 3.2.4)
2. Adequacy of the activities in the proposal in relation to the national challenges (section 3.2.4)
3. Clarity and consistency of the objectives and scope of the proposal against the objectives identified in this call (section 3.3)
4. Alignment of the actions with existing national strategies related to fighting illegal employment and protecting the rights of TCN workers (section 3.2.4)

B. Quality (30 points – if appropriate: minimum score 20 points):

1. Maturity of the proposal: clarity and adequacy of the project design and implementation plan (timetable); involvement of relevant entities for the design of the call; robustness of the work organisation and project management structure, including sound operational and financial management; effectiveness of monitoring and evaluation; and identification of key risks with appropriate mitigation measures
2. Complementarity of the action with past, current or future use of national budget or other EU funding instruments: degree to which the proposal ensures synergies with ongoing and potentially future projects (section 3.2.3)
3. Cost-effectiveness: reasonability and feasibility of the estimated costs, and the methodology for the calculation of the costs.
4. Compliance with the EU acquis, recommendations, guidance and good practices established in the EU (in particular but not exclusive to 3.2.1).

C. Impact (30 points – if appropriate: minimum score 15 points):

1. Multi-stakeholder approach in the implementation of the action (section 3.2.4.)
2. Impact or effect of the proposal vis à vis the objective of the call (Union added value) (section 3.4)
3. Efforts planned to share and scale (up) the results of the proposal in the Member State concerned
4. Sustainability of the results achieved with the funded action (section 3.2.3).

Member States must ensure respect for the horizontal principles described in Article 9 of Regulation (EU) 2021/1060, including respect for fundamental rights and compliance with the Charter of Fundamental Rights of the European Union. Moreover, Member States must ensure that the envisaged actions are not affected by a reasoned opinion delivered by the Commission in respect of infringement proceedings under Article 258 of the Treaty on the Functioning of the European Union (TFEU) that put in doubt the legality and regularity of expenditure or the performance of the actions (Article 11(6) of Regulation (EU) 2021/1147).

4.2. Application procedure

Deadline for the application: Member States are invited to submit their proposals on 28/08/2026 at the latest, using the official AMIF/2026/SA/2.4.1. Application Form attached to this Note, together with its annexes. The applicant can submit an application in any official EU language (project summary should however always be in English). For reasons of efficiency, it is strongly advised to use English for the entire application.

In line with the Regulation (EC) No 1049/2001⁽¹³⁾, any document held by the Commission, including documents containing sensitive information, may be subject to a request for public access. Therefore, if relevant, the Managing Authorities should submit each application in a separate email. Likewise, clarifications where needed/required per application should be sent in separate emails.

To ensure equal and fair treatment of the proposals and allow the Commission to allocate at the same date all the available funding, DG HOME will assess all proposals simultaneously. Therefore, proposals submitted after the deadline will not be admissible.

The Members of the Committee for the Home Affairs Funds will be informed at the latest 10 working days before the deadline for the submission of the proposals in case the deadline for the submission of proposals is extended.

E-mail address for the application: The proposals should be submitted to the AMIF specific actions functional mailbox HOME-AMIF-SPECIFIC-ACTIONS@ec.europa.eu Member States may submit additional documentation if necessary.

No modification to the application is allowed once the deadline for submission has elapsed. However, if there is a need to clarify certain aspects or to correct clerical mistakes, the Commission may contact the applicant during the evaluation process. A reply should be provided by the Member State within 3 working days from the request date.

Any requests for clarification of the Member States on this call for the expression of interest may be sent by 26/06/2026 at the latest, to HOME-AMIF-SPECIFIC-ACTIONS@ec.europa.eu.

Requests should only be sent **by the Managing authority**. It is the Managing Authority's role to explain potential beneficiaries the applicable rules and specificities of the programmes in general and of a specific action in particular and to help prepare applications for a specific action. The Managing Authority is the contact point and takes the responsibility to review questions from potential beneficiaries and, only where necessary, raise questions to or request clarifications from the Commission services. As projects under specific actions are managed at national level, according to national rules, specific questions on eligibility of costs need to be addressed first to the Managing Authority.

To respect the equal treatment and transparency, replies to written requests for clarification will be sent to all Member States, via HOME-AFFAIRS-FUNDS-COMMITTEE@ec.europa.eu.

DG HOME will inform Member States of the outcome of the assessment of the proposals towards November 2026.

⁽¹³⁾ Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents

5. AMENDMENT OF THE AMIF PROGRAMME AND ELIGIBILITY OF EXPENDITURE

After having been informed of the outcome of the call for expression of interest, each successful Member State shall submit to the Commission a request to amend its AMIF programme via SFC. The amended programme should include a short description of the specific action, adjusted output and result indicators, and include the costs and codes ⁽¹⁴⁾ linked to this specific action (respectively in the description and under tables 1, 2 and 3 of the relevant specific objective, and table 6 of the programme).

Yours faithfully,

Silvia MICHELINI

⁽¹⁴⁾ Expenditure which becomes eligible as a result of a programme amendment is only eligible from the date of the submission of the corresponding request to the Commission (Art. 63(7) of Regulation (EU) 2021/1060).

