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**NOTE**

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From:	General Secretariat of the Council
To:	JHA Counsellors (Asylum)
Subject:	eu-LISA note on proposed Eurodac implementation approaches at national level

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Delegations will find attached in ANNEX a note from eu-LISA.

Strasbourg, 13 June 2024

## Draft note related to Eurodac Recast Implementation

### Subject: Proposed Eurodac Recast implementation approaches at national level

With the Pact on Migration and Asylum, Eurodac will become part of an interoperable, and integrated migration and border management system.

Given the much wider scope of the database and the significantly increased functionalities, a completely new system will need to be built.

As stated in the Commission's Implementation Plan, the new Eurodac is the operational backbone supporting the recently adopted legal framework. Its timely development and entry into operation is a critical precondition the implementation of all other elements of the Pact.<sup>1</sup>

In this context, eu-LISA has investigated an approach that would enable the successful acceleration of implementation at both central and national levels, taking into account that Eurodac Recast has to be implemented within 24 months following its adoption, i.e. by 12 June 2026. The Agency has also considered ways to reduce the effort and costs for the Member States as much as possible, by exploring technical synergies and ways to avoid potential duplicate development efforts across Member States.

This note presents the pros and cons of two approaches: The first approach is a full "system-to-system" interaction between the national systems and the central Eurodac system. The second approach consists of a more centralised solution where eu-LISA would deliver for the Member States a standardised, common, user interface to the central system.

The analysis found that important efficiency gains could be achieved if eu-LISA would deliver, on top of the required central solution, a standardised and common user interface allowing Member States to directly access all required functionalities, without the (obligatory) need for a national solution interfacing with the central system (through system-to-system communication). Member States could still opt to access specific functionalities via their national solutions through a system to system communication where preferred.

<sup>1</sup> [https://home-affairs.ec.europa.eu/document/download/493c34b7-83c7-4711-91d4-712e40d3524a\\_en?filename=Common%20Implementation%20Plan%20for%20the%20Pact%20on%20Migration%20and%20Asylum\\_en.pdf](https://home-affairs.ec.europa.eu/document/download/493c34b7-83c7-4711-91d4-712e40d3524a_en?filename=Common%20Implementation%20Plan%20for%20the%20Pact%20on%20Migration%20and%20Asylum_en.pdf)

Opting for a single solution instead of each Member State being responsible for procuring and developing their own individual solutions would greatly reduce the effort and logistics needed to build and test the system as a whole, and on time.

Concretely, this solution would provide the following:

- End-users from the Member States would be able to access all agreed Eurodac Recast functionalities through a Web User Interface (WUI) over the secure communication network to eu-LISA (TESTA network), not over the Internet.
- Member States would need to ensure their users' access to this WUI and no technical integration would be needed with National Systems. The end-users will be able to use transactions as Create, Update, Delete, Search (and all other agreed functionalities of the Eurodac Core System) through this WUI.
- There would be an additional, smaller-scale, system-to-system interface exposed (and described in the specifications document (Interface Control Document - ICD)), proposed for those Member States that may have specific reasons to using limited key operations through a national solution.
  - o Based on an assessment by eu-LISA on the most utilised functionalities that could be made available through a system-to-system interface, the current proposal entails the 'Search and Insert' related functionalities, hit and no-hit reply and the notification related to the True/False hit.
- The specifications on the operations considered essential to be offered through an ICD, need to be agreed between all the stakeholders. In order to ensure timely delivery, it is key to keep the operations requiring an ICD (for a system-to-system interface) as limited as possible.
- This is not an either/or implementation: all Member States are able to use simultaneously both the WUI and decide to opt-in for the small-scale system-to-system ICD.

Through such an approach, the development complexity and cost are greatly reduced for Member States, thereby lowering the risks on the timely delivery of the system. Interactions requiring national systems involvement would be either completely eliminated for the Member States that prefer to go for the WUI or greatly reduced to very specific functionalities for those preferring a limited ICD. This approach opens the way to a successful and timely implementation of the Eurodac Recast Regulation.

The overview provided in the following tables aims to support the Commission and the Member States in better understanding the pros and cons of both the system-to-system approach (current) and the more centralised approach (new) one.

### Current approach – full system- to- system interaction

An Interface Control Document (ICD) is provided, containing all technical specifications requiring a full system-to-system interaction, thus all operations between the central system and the national systems.

PROS	CONS
<ol style="list-style-type: none"> <li>1. Implementation approach used in the past and familiar to Member States</li> <li>2. Mature technical solutions used in the past by MS may be maintained (with necessary functional upgrades)</li> <li>3. User profiles and access determined through the national system (i.e. no need to determine user profiles at the Central System level)</li> <li>4. Allows for the highest grade of automation</li> </ol>	<ol style="list-style-type: none"> <li>1. On-time readiness of all Member States more difficult to achieve</li> <li>2. Member States will have to develop their own system at national level</li> <li>3. Member States need to receive all specifications, of very good quality, in advance, to procure or develop systems</li> <li>4. More work and many dependencies throughout the implementation</li> <li>5. More testing phases for the Member States</li> <li>6. Higher cost impact at national level</li> <li>7. ICD developed in iterations but still with a 6 months timeline</li> <li>8. Rigid and slow approach: difficult to account for last minute changes and complex release management which will impact the Member States planning;</li> <li>9. Requires all use cases to be defined and implemented from the start, as changes would be complex and time consuming to incorporate at a later stage</li> </ol>

### New Approach – A more Centralised Solution

A centralised solution available for all Member States, allowing the end-users to interact with Eurodac central system through a graphical user interface (GUI). Therefore, interactions requiring national systems involvement are either eliminated for the Member States or reduced to very specific functionalities, should the latter be required, through a smaller scale ICD for these most utilized functionalities.

PROS	CONS
<ol style="list-style-type: none"> <li>1. Creates the conditions for the implementation of the Pact provisions in a timely and modernised manner</li> <li>2. Effort minimised at national level (i.e. less procurement, development, system testing)</li> <li>3. Resource impact for implementation (human / financial) reduced at national level</li> <li>4. Less complexity for the Member States</li> <li>5. Specifications and thus ICD scope is eliminated or reduced to very specific functionalities</li> <li>6. Agile and flexible approach to development,</li> <li>7. Reusability of previously developed software and products at central level</li> </ol>	<ol style="list-style-type: none"> <li>1. New approach for Member States</li> <li>2. Member States would have to thoroughly analyse which services will have to be supported via a system-to-system interaction, as there could be more manual processes and potential data entry through usage of a Web User Interface;</li> <li>3. Need for comprehensive business analysis between eu-LISA, the Commission and the Member States to better understand the business/user needs and the required human resources.</li> </ol>