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**NOTE**

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From: European Commission  
On: 5 September 2025  
To: Working Party for Schengen Matters / Mixed Committee (EU-Iceland/Norway/Switzerland/Liechtenstein)

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No. prev. doc.: 5241/25

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Subject: Schengen evaluation of Iceland - Review of the adequacy of the Action Plan to remedy the deficiencies identified in the 2022 evaluation of Iceland on the application of the Schengen acquis in the field of the data protection

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**REDACTED DOCUMENT ACCESSIBLE TO THE PUBLIC (17.10.2025).  
ONLY MARGINAL PERSONAL DATA HAVE BEEN REDACTED.**

Delegations will find in annex the Review of the adequacy of the action plan of Iceland to remedy the deficiencies identified in the 2022 evaluation carried out to verify the application of the Schengen acquis in the field of data protection, provided by the Commission in accordance with Article 21(2) of Council Regulation (EU) 2022/922. The review of the action plan was provided to Iceland by Commission letter of 04 August 2025 (Ref. Ares(2025)6334289), as set out in the annex.



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL JUSTICE AND CONSUMERS

The Director-General

Brussels, 11/07/2025  
JUST/C3/VB/en/[just.c.3\(2025\)](#)

HE Mr Kristján Andri Stefánsson  
Head of Mission of Iceland to the EU  
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**Subject: Review of the adequacy of the action plan of Iceland to remedy the deficiencies identified in the 2022 evaluation on the application of the Schengen *acquis* in the field of data protection**

Your Excellency,

I thank you for the action plan of Iceland to remedy the deficiencies identified in the 2022 evaluation on the application of the Schengen *acquis* in the field of data protection which was submitted to the Commission and the Council on 2 January 2025.

Please find attached, pursuant to Article 21(2) of Council Regulation (EU) 2022/922, the review of the adequacy of the action plan, done by the Commission services after consultation of the evaluation team.

The action plan is considered as adequate and it is welcome that Iceland has already implemented or is in the process of implementing the recommendations.

In accordance with Article 21(3) of Council Regulation (EU) 2022/922, Iceland is to report to the Commission and the Council on the implementation of the action plan every 6 months from the date of notice of this review until the Commission considers the action plan fully implemented. In accordance with Article 21(2), second subparagraph, of Council Regulation (EU) 2022/922, the Commission will present the review of the action plan to the Council.

The Commission services are at the disposal of Iceland to facilitate the implementation of the action plan.

Yours faithfully,

e-signed  
Ana Gallego

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Annex: *Review of the adequacy of the action plan of Iceland to remedy the deficiencies identified in the 2022 evaluation on the application of the Schengen acquis in the field of data protection*

# Review of the adequacy of the action plan of Iceland to remedy the deficiencies identified in the 2022 evaluation on the application of the Schengen *acquis* in the field of data protection

(Article 21(2) of Council Regulation (EU) 2022/922)

## 1. INTRODUCTION

Council Regulation (EU) No 1053/2013 of 7 October 2013<sup>1</sup> established an evaluation and monitoring mechanism to verify the application of the Schengen *acquis*<sup>2</sup>.

In accordance with that Regulation, a Schengen evaluation was carried out between 19 and 23 September 2022 to evaluate Iceland's application of the Schengen *acquis* in the field of data protection.

A report listing the findings and assessments identified during the evaluation was adopted by Commission Implementing Decision C(2024)5000. Following the adoption of the evaluation report by the Commission, the Council adopted an Implementing Decision<sup>3</sup> setting out a Recommendation on addressing the deficiencies identified in that report in accordance with Article 15(3) of Council Regulation (EU) 1053/2013.

In the meantime, Council Regulation (EU) No 1053/2013 was replaced by Council Regulation (EU) 2022/922<sup>4</sup>, which started to apply on 1 October 2022. According to the transitional provisions set out in Article 31 of the new Regulation, for evaluations carried out before 1 February 2023 (like the evaluation of Iceland) the follow-up and monitoring activities, starting with the submission of the action plans, shall be carried out in accordance with Regulation (EU) 2022/922. In accordance with Article 21 (1) of Regulation (EU) 2022/922, on 2 January 2025 Iceland submitted to the Commission and the Council an action plan to remedy the identified deficiencies.

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<sup>1</sup> OJ L 295, 6.11.2013, p. 27.

<sup>2</sup> Regulation (EU) No 1053/2013 has since been replaced by Regulation (EU) 2022/922 of 9 June 2022 on the establishment and operation of an evaluation and monitoring mechanism to verify the application of the Schengen *acquis*, and repealing Regulation (EU) No 1053/2013 (OJ L 160, 15.6.2022, p. 1). Nevertheless, as the present report relates to an evaluation carried out before 1 February 2023, it is adopted pursuant to Regulation (EU) No 1053/2013 in accordance with the transitional provisions laid down in Article 31(3) of Regulation (EU) 2022/922.

<sup>3</sup> Council document 14786/24

<sup>4</sup> OJ L 160, 15.6.2022, p. 1.

In accordance with Article 21(2) first subparagraph of Regulation 2022/922, the Commission carried out a review of the adequacy of the action plan and consulted the members of the team which carried out the evaluation. This review is provided below.

## **2. ADEQUACY AND GENERAL REMARKS**

The action plan is considered as **adequate**.

It provides summary information on the actions that Iceland has taken or will take to remedy the deficiencies observed.

On the basis of the reported actions, recommendations 5, 13, and 14 can be considered as fully implemented and no further follow-up reporting on them is necessary.

The implementation of other recommendations is underway or close to completion. Iceland is invited to continue with the proposed actions and provide information in relation to the implementation of recommendations.

In accordance with Article 21(3) of Regulation (EU) 2022/922, Iceland is to report to the Commission and the Council every 6 months from the date of notice of the receipt of this review until the Commission considers the action plan fully implemented. The subsequent steps should take place through KOEL, the IT platform supporting the monitoring process.

In accordance with Article 21(2), second subparagraph, of Regulation (EU) 2022/922, the Commission will present the review of the action plan to the Council.