

Brussels, 25 September 2025
(OR. en)

13170/25
ADD 2 REV 1

JAI 1297
FRONT 215
ENFOPOL 338
CADREFIN 228
IA 132
CT 119
ASIM 64

COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	17 September 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

No. Cion doc.:	SEC(2025) 254 final
Subject:	REGULATORY SCRUTINY BOARD OPINION COMMISSION STAFF WORKING DOCUMENT EVALUATION Mid-term Evaluation of the Internal Security Fund (ISF) for the 2021-2027 programming period

Delegations will find attached document SEC(2025) 254 final.

Encl.: SEC(2025) 254 final



EUROPEAN COMMISSION

Brussels, 16.9.2025
SEC(2025) 254 final

REGULATORY SCRUTINY BOARD OPINION

**COMMISSION STAFF WORKING DOCUMENT EVALUATION
Mid-term Evaluation of the Internal Security Fund (ISF) for the 2021-2027
programming period**

{SWD(2025) 274 final}
{SWD(2025) 275 final}



EUROPEAN COMMISSION
Regulatory Scrutiny Board

Brussels,
Ares(2025)

Opinion

Title: Evaluation / Mid-term Evaluation of the Internal Security Fund (ISF)

Overall opinion: NEGATIVE

(A) Policy context

The Internal Security Fund 2021-2027 (ISF) is one of the three Home Affairs funds for the period 2021-2027. With a total budget of EUR 1.93 billion, it aims to contribute to preventing and combating terrorism and radicalisation, serious and organised crime and cybercrime.

The mid-term evaluation, covering the period up to mid-2024, is foreseen in the ISF Regulation (EU) 2021/1149 and shall take into account the results of the retrospective evaluation of the previous programming period. Its purpose is to assess: (a) the effectiveness of the Fund, including the progress made towards the achievement of its objective; (b) the efficiency of the use of resources and the management and control measures; (c) the continued relevance and appropriateness of the implementation measures; (d) the coordination, coherence and complementarity with other Union funds; and (e) the Union added value.

(B) Key issues

The Board notes the additional information provided and commitments to make changes to the report.

However, the Board gives a negative opinion, because the report contains the following serious shortcomings:

- (1) The intervention logic is not clearly defined and does not specify how progress in achieving the specific objectives was meant to be assessed. The report does not effectively utilise available data to analyse the Fund's effectiveness and efficiency at this stage.**
- (2) The analysis of coherence lacks sufficient substantiation. The report does not clearly analyse the Fund's continuous relevance and Union added value.**
- (3) Statements, conclusions and lessons learned do not consistently reflect underlying evidence. The report does not inform on how the monitoring and evaluation framework needs to be adapted to allow for comparisons between different Member States and for an evidence-based retrospective evaluation.**

This opinion concerns a draft evaluation/fitness check which may differ from the final version.

Commission européenne, B-1049 Bruxelles – Belgium - E-mail: regulatory-scrutiny-board@ec.europa.eu

(C) What to improve

- (1) The intervention logic should be presented and discussed in the main report. It is unclear and does not explain how the intervention was expected to work. It mixes indicators with expected outputs and results, lacks clarity on how Annex II (implementation measures) of the Regulation is reflected in the outputs, and does not discuss how progress on reaching the specific objectives was meant to be assessed.
- (2) The report should be clear about the points of comparison and describe also in quantitative terms how progress towards attaining objectives is measured and against what point of comparison. The mid-term evaluation should take into account the results of the retrospective evaluation of the ISF-P under the previous programming period or explain upfront why this has not been done. It should explain why the majority of Member States have not reported on some objectives and better use available data to analyse the Fund's effectiveness and efficiency at this stage.
- (3) The report should more systematically refer to the existing evidence base and bring in more elements from the supporting study and case studies. Reporting on progress in financial implementation is not sufficient as evidence of effectiveness and efficiency, or as a basis for concluding that the programme is on track to achieve its objectives. Milestones and targets related to outputs and results should be clearly summarised in the report, and existing data on such achievements should be systematically reported. The conclusions should be more nuanced and better aligned with the evidence available and its limitations. Statements not supported by evidence should be omitted.
- (4) The report should further elaborate on the monitoring and evaluation framework in place and assess the extent to which the data collected will allow to track progress on all elements of the intervention logic including on specific objectives. . It should be explicit about data and information that Member States provide in their regular reporting, identify and analyse any issues such as inconsistencies, unnecessary reporting burden or gaps that would need to be addressed. The lessons learned should include potential changes to the reporting system and the established indicators in order to ensure the effective assessment of the Fund's achievements in the retrospective evaluation.
- (5) The report should analyse to what extent different stakeholders' perceptions of complexity and cumbersome reporting are representative and reliable. Administrative costs and potential for improvement, simplification and burden reduction should be better analysed for both shared management programmes and Thematic Facility.
- (6) Statements on external coherence with other EU funds should be thoroughly substantiated. Internal coherence across different management modes should be better assessed based on thorough analysis of complementarities of implemented operations. The analysis should allow for making conclusions on the current mix of shared, direct and indirect management modes.
- (7) The report should better demonstrate continuous relevance and Union added value. It should analyse how the Fund addresses needs based on a comparative analysis of identified needs and focus of the programme and the content of operations. It should identify evolving ones by incorporating relevant foresight analysis. As regards the Union added value, the report should better explain and provide supporting evidence on the effects of investments by the Fund, as opposed to other national investments in the same area and analyse any data gaps which could hamper the analysis of additionality in the retrospective evaluation.

Some more technical comments have been sent directly to the author Service.

(D) Conclusion

The lead Service must revise the report before launching the interservice consultation.

The lead Service may resubmit to the Board a revised version of this report.

Full title	Mid-term Evaluation of the Internal Security Fund (ISF)
Reference number	PLAN/2023/1283
Submitted to RSB on	05 February 2025
Date of RSB meeting	05 March 2025