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COMMISSION STAFF WORKING DOCUMENT

Accompanying the

**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE
COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE
COMMITTEE OF THE REGIONS**

on the Interim Evaluation of the Customs Control Equipment Instrument 2021-2027

{COM(2025) 733 final}

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Glossary

APR	Annual Progress Report
BCP	Border Crossing Point
BRG	Better Regulation Guidelines
CELBET	Customs Eastern and South-Eastern Land Border Expert Team
CCE	Custom Control Equipment
CCEI	Customs Control Equipment Instrument
CLEN	Customs Laboratories European Network
CUP	Customs Union Performance
DG BUDG	Directorate-General for Budget
DG HOME	Directorate-General for Migration and Home Affairs
DG TAXUD	Directorate General for Taxation and Customs Union
EC	European Commission
EQ	Evaluation Question
EQM	Evaluation Question Matrix
EU	European Union
II	Impact Indicator(s)
JRC	Joint Research Centre
MAWP	Multi-annual work programme
MEF	Monitoring and Evaluation Framework
MFF	Multiannual Financial Framework
MS	Member State(s)
OLAF	European Anti-Fraud Office
OP	Output Indicator(s)
RI	Results Indicator(s)
TOR	Terms of Reference

1. INTRODUCTION

The Customs Control Equipment Instrument (CCEI, also referred to as ‘the Instrument’), established by Regulation (EU) 2021/1077¹, is part of the Integrated Border Management Fund along with the Border Management and Visa Instrument². The CCEI is a new EU funding programme that provides grants to customs authorities in EU Member States for the purchase, maintenance and upgrading of customs control equipment. Customs authorities face increasing challenges in performing checks on goods entering and exiting the EU to ensure safety and security while facilitating legitimate trade. Customs officers and customs laboratories have to be equipped with modern and reliable control equipment to do their tasks efficiently and effectively. The CCEI addresses Member States’ need for financial support for the purchase of such equipment. The Instrument has a budget of EUR 1 006 million for the period 2021-2027.

The CCEI’s objective is to help ensure that customs controls across the EU are adequate and equivalent. The long-term aim is to harmonise the way national customs authorities carry out controls. The CCEI supports customs authorities to act as one and to achieve their mission to:

- protect the financial and economic interests of the EU and its Member States;
- ensure security and safety within the EU; and
- protect the EU from illegal trade while facilitating legitimate business activity.

In accordance with Article 13 of the CCEI Regulation, the Instrument is subject to an interim evaluation. The overall goal of this evaluation is to assess the performance of the Instrument, including aspects such as its effectiveness, efficiency, relevance, coherence and Union added value, in line with the Better Regulation guidelines, and to draw lessons for possible future improvements.

To support the interim evaluation exercise, an external contractor was engaged to carry out a study. This study was delivered by Ipsos and Syntesia from September 2024 to April 2025. The evaluation covers the activities from the Instrument’s launch in 2021 until the end of 2024. Projects financed under the first call launched in 2022 and the second call launched in 2023, are implemented in all 27 Member States. This interim evaluation has been undertaken at an early stage of the programme’s implementation as only a few projects have been completed from the first call while the grants under the second call have just started.

This staff working document (SWD) presents the main findings and conclusions of the interim evaluation and provides evidence and data which could serve as a basis for further improving the functioning of the CCEI in the remaining programme period.

¹ Regulation (EU) 2021/1077 of the European Parliament and of the Council of 24 June 2021 establishing, as part of the Integrated Border Management Fund, the instrument for financial support for customs control equipment

² Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for financial support for border management and visa policy. The fund is included in Heading IV ‘Migration and border management’.

2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

2.1 Description of the intervention and its objectives

This chapter provides an overview of the CCEI as it was designed and intended to function. First, a general description of the Instrument is provided outlining its key characteristics. Subsequently, a brief overview of the Intervention Logic (which was developed as part of the Monitoring and Evaluation Framework) is provided, outlining the key expected results at different levels, and the causal chains between them, including the assumptions and external factors that had been identified at the time the Intervention Logic was developed.

Overview of the CCEI

The CCEI is a funding programme designed to support the purchase, maintenance, and upgrading of customs control equipment (CCE)³ in the European Union (EU). Part of the Integrated Border Management Fund (IBMF), the CCEI aims to contribute to improving and harmonising customs controls across EU Member States. It had an original budget of just above EUR 1 billion for the 2021-2027 period and its legal basis is defined in the CCEI Regulation with an additional Delegated Regulation for monitoring and evaluation.⁴

The CCEI's general aim is to support the Customs Union and customs authorities in protecting financial interests, ensuring security, and facilitating legitimate trade. More specifically, it aims to contribute to adequate and equivalent customs controls through transparent equipment purchases, maintenance, and upgrades. Under the CCEI, Member States receive up to 80% in EU co-financing for CCE. Eligible equipment includes equipment for non-intrusive inspection, hidden object detection, radiation detection, laboratory analysis, and various other customs control purposes. The CCEI supports both Border Crossing Points (BCPs) and customs Laboratories (thereafter Labs).

In terms of the implementation of the Instrument, CCEI grants are awarded to national customs authorities based on calls for proposals. Since the CCEI has been launched in 2021, 42 projects have been supported under the first CCEI call, providing over EUR 273 million of co-funding. By the end of 2024, grant agreements under the second call had been signed or were in the process of being signed. A third CCEI call is expected to be launched in 2026.

The table below provides a high-level overview and summary of the CCEI's key characteristics.

³ Customs Control Equipment (CCE) is used interchangeably with 'equipment' throughout this report. Both terms can be assumed to be synonymous.

⁴ Commission Delegated Regulation (EU) 2022/1528 of 4 July 2022 supplementing Regulation (EU) 2021/1077 of the European Parliament and of the Council with provisions on the establishment of a monitoring and evaluation framework.

Table 1: Key features of the CCEI

Aspect	Overview
Budget and legal base	<p>The source of funding for the CCEI is the Integrated Border Management Fund (IBMF), a programme that makes available EUR 6.24 billion for the 2021-2027 Multi-annual Financial Framework (MFF) for the purpose of improving European integrated border management. It comprises two strands, the Border Management and Visa Instrument (BMVI) focusing on the control of persons crossing the EU external borders, and the CCEI focusing on the customs controls on cross-border movement of goods.</p> <p>The legal base for CCEI is the CCEI Regulation, and it has a budget of just over EUR 1 billion (EUR 1,006,407,000, to be precise) for the current MFF (in 2021 prices). In addition, a Delegated Regulation codifies the indicators defined in the CCEI’s monitoring and evaluation framework (discussed below).</p>
Aims and objectives	<p>The CCEI provides financial support for the purchase, maintenance and upgrading of customs control equipment, with a view to the IBMF and long-term aim of the harmonised application of customs controls by the Member States. A fundamental principle is that the Customs Union is only as strong as its weakest link – equivalent customs control equipment is therefore needed to prevent the diversion of (illicit) trade towards entry points with less robust controls.</p> <p>Its general objective is to support the Customs Union and customs authorities in their mission, which is to (i) protect the financial and economic interests of the European Union and its Member States, (ii) ensure security and safety within the Union and (iii) to protect the Union from illegal trade while facilitating legitimate business activity.</p> <p>Progress towards the general objective should come about through the achievement of a specific objective, which is to “contribute to adequate and equivalent results of customs controls through the transparent purchase, maintenance and upgrading of relevant and reliable state-of-the-art customs control equipment that is secure, safe and environmental-friendly, thereby helping the customs authorities act as one to protect the interests of the Union”.</p>

Aspect	Overview
Eligible purchases	<p>The vast majority of the CCEI budget is devoted to the purchase, maintenance and upgrade of customs control equipment itself. The support is provided with up to 80% co-financing for equipment that meets the criteria laid out in the CCEI Regulation; funding in excess of the 80% ceiling can only be granted “in duly justified exceptional circumstances” (Article 8). Article 6(1)(b) specifies that the equipment must address at least one of several purposes, namely (i) non-intrusive inspection, (ii) indication of hidden objects on humans; (iii) radiation detection and nuclide identification; (iv) analysis of samples in laboratories; (v) sampling and field analysis of samples; (vi) handheld search. Annex I of the Regulation defines an indicative list of the types of equipment that can be eligible, with an emphasis on limiting the support to equipment for customs controls rather than more general equipment needs of customs authorities. The CCEI supports equipment for both BCPs and customs laboratories.</p> <p>More specific priorities and requirements concerning the equipment are set out in Multiannual Work Programmes (MAWPs) and associated calls for proposals, of which there have been two so far, for 2021-2022 and 2023-2024.</p> <p>Aside from the funding for customs control equipment, a small proportion of the CCEI budget is also allocated to flanking activities related to monitoring, evaluation and control/audit; studies, events and communication.</p>

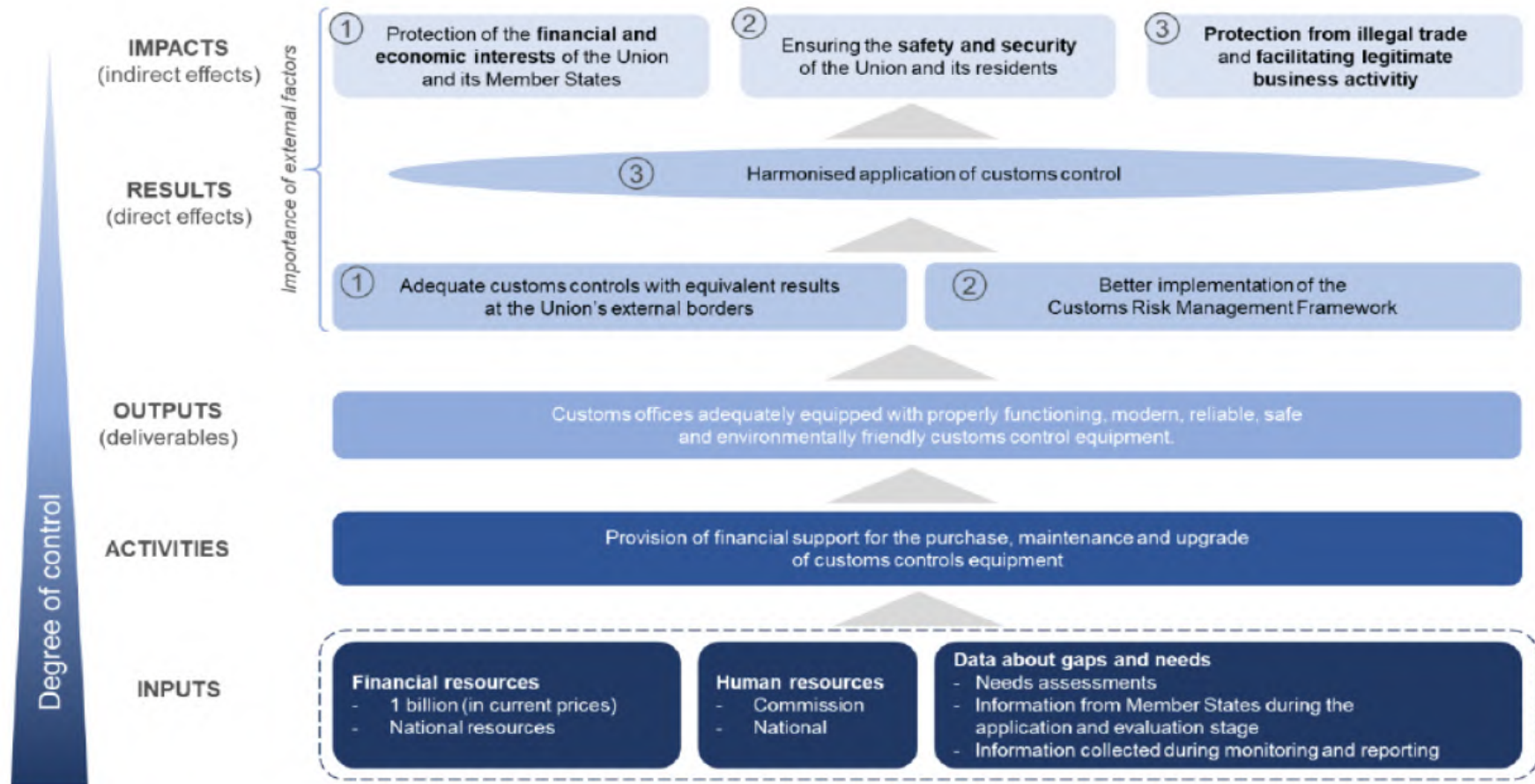
Aspect	Overview
Implementation modalities	<p>The CCEI uses the modality of direct management by the Commission services. The vast majority of the funding is implemented via grant agreements with the Member States, which then purchase designated customs control equipment or related services (maintenance / upgrade) according to the relevant EU and national procurement legislation, rules and procedures. The grants are awarded on the basis of applications in response to calls for proposals. In terms of payment modalities, after the signature of the grant 50% of the grant amount is paid as pre-financing while the remaining 50% is paid at the end of the project after the approval of the final report.</p> <p>To assist in the CCEI's implementation, DG TAXUD has established a dedicated expert group – the CCEI Coordination Group – made up of representatives of national customs administrations from all 27 Member States. Its objectives are to discuss and adopt policy guidelines, provide updates on implementation status and related activities, and, as necessary, consult with and notify the Member States. To encourage cooperation and progress, 17 concrete 'deliverables' providing topical guidance (e.g., on the procurement of customs control equipment; safety, security, environmental and interoperability of the equipment; co-sharing of equipment) were defined at the outset, for which individual Member States take responsibility and gather input from others as needed⁵.</p> <p>In line with Article 12(2) of the CCEI Regulation, implementation is further supported by a comprehensive monitoring and evaluation framework, whose modalities are further defined in the Delegated Regulation ((EU)2022/1528) and Staff Working Document (SWD(2022)314). This describes the CCEI's intervention logic, defines indicators and sub-indicators at output, results and impact levels. Crucially, the Regulation requires recipients of funding to provide the data to inform the indicators. A CCEI Data Model has been developed as part of an integrated approach to data collection, processing and reporting throughout the programming cycle. Inter alia, the results of ongoing monitoring are published in the form of Annual Progress Reports, so far for 2021, 2022 and 2023.</p>

Intervention logic of the CCEI

An intervention logic was developed ex-ante as part of the Monitoring and Evaluation Framework (MEF) for the CCEI, as reproduced in the figure below. It provides a step-by-step overview of the programme's causal chains and overall path to achieving its intended objectives.

⁵ Minutes of the kick-off meeting of the CCEI Coordination Group, 12-13 July 2021.

Figure 1: The CCEI's Intervention Logic



Source: CCEI Monitoring and Evaluation Framework, SWD(2022) 314 final.

The following bullet points concisely set out the different stages of the intervention logic, considering the intermediate steps expected to be important for the intervention to be realised as envisaged:

- **Inputs:** The CCEI was designed to rely on three major inputs, namely financial resources (the EUR 1 billion budget for grants, complemented by Member States spending), human resources (from both the European Commission and national authorities), and data (complete and accurate information about gaps and needs surrounding customs equipment).
- **Activities:** The CCEI's primary activity was intended to be the provision of financial support to Member States via grants for the purchase, maintenance, and upgrade of customs control equipment. Success at this level was expected to depend on the Commission's ability to organise calls for proposals and the capacity of Member States to apply for and handle the grants.
- **Outputs:** The main intended output was that Member States customs offices would be equipped with adequate customs control equipment. The progression from activities to outputs was expected to be subject to several factors, including Member States' administrative capacity, equipment availability, differences in resources across Member States, and potential geopolitical influences on needs and priorities.
- **Results:** The equipment purchased was intended to contribute to two main results, namely adequate customs controls leading to equivalent results at the EU's external borders and better implementation of the Customs Risk Management Framework, leading to harmonised application of customs controls. The administrative capacity and resources of national authorities were recognised as crucial factors for these results to materialise.
- **Impacts:** The CCEI was designed to contribute to three long-term impacts aligned with the Customs Union's mission, namely protection of the financial and economic interests of the EU and its Member States, ensuring the safety and security of the EU and its residents, and facilitation of legitimate business activities while preventing illegal trade.

Several key **assumptions** underpinning the causal chain of the abovementioned Intervention Logic were identified, namely:

- **Budget adequacy:** The allocated CCEI budget of circa EUR 1 billion is sufficient to address performance gaps by purchasing, maintaining, and upgrading necessary CCE in the seven-year period.
- **Human resources:** Both the European Commission and Member States commit adequate and competent human resources to manage and implement the CCEI effectively.
- **National capacity:** Member States have the necessary resources, expertise, and capacity to co-finance and actively participate in the implementation of the CCEI.
- **Alignment with long-term vision:** Resources are used in a manner consistent with the long-term goal of achieving equivalent results in customs controls across the EU's external borders.

- **Support from the Customs Programme:** The Customs Programme provides adequate support for activities such as needs assessments, training, and expert pools, which are essential for the CCEI's success.
- **Needs assessment methodology:** The needs assessment process linked to the data model is continuously improved, based on expert input, and ensures the collection of comparable and relevant data.
- **Transparent fund allocation:** Funds are allocated transparently based on logical and coherent award criteria, focusing on identified priorities and ensuring relevance and added value.
- **Equipment use and reporting:** Purchased equipment is primarily used for its intended purpose, and Member States commit to achieving pre-defined results, reporting on equipment use and outcomes as required.

In addition to the causal chain and its associated assumptions, a number of **external factors** that may have an impact on the implementation and results of the CCEI are also considered. These were also defined as part of the Intervention Logic in the MEF, and can be summarised as follows:

- **Customs Risk Management Framework:** The effectiveness of the CCEI depends on the continued functionality of the Customs Risk Management Framework, which underpins risk-based customs controls.
- **Complementary with relevant EU policies and programmes:** The CCEI's success is linked to the effective coordination and synergy with other EU programmes, such as the Border Management and Visa Instrument (BMVI), the Union Anti-Fraud Programme, Horizon Europe, and the Recovery and Resilience Facility (RRF). These programmes must complement the CCEI to avoid duplication and enhance overall and effective border management.
- **National-level challenges:** Delays in public procurement processes, administrative burdens, and capacity constraints at the national level may impact the timely implementation of CCEI projects.
- **Evolving risks and threats:** The dynamic nature of risks and threats at border crossing points (e.g., emerging security threats, changes in trade patterns) may require adjustments to equipment needs and priorities.
- **Technological advancements:** The availability of state-of-the-art, reliable, and environmentally friendly equipment that meets identified needs is critical. Rapid technological changes may influence the suitability and effectiveness of purchased equipment.
- **Inter-agency cooperation:** The CCEI's effectiveness may be influenced by the level of cooperation between customs authorities and other border management agencies, particularly in the shared use of equipment and interoperability of systems.

- **Global trade and supply chain trends:** Factors such as the rise of e-commerce, digitalisation, and resilience to cyber-attacks may impact the demands on customs controls and the relevance of the equipment funded by the CCEI.

This intervention logic and its constituent parts serve as a framework for understanding how the CCEI was intended to function, providing a reference point for the evaluation to assess the programme’s design and implementation against its original objectives and intended causal chain. As such, it is used as analytical tool underpinning parts of the narrative presenting the key evaluation findings and in the detailed responses to the evaluation questions (Annex 3, particularly the analysis of effectiveness).

2.2 Point(s) of comparison

This chapter considers potential points of comparison against which the CCEI can be assessed. Indeed, to compare actual performance a baseline is generally needed to provide a benchmark against which progress can be robustly measured for EU interventions. In the case of the CCEI, the obvious point of comparison is the situation before its creation in 2021, i.e. when no dedicated EU instrument for financial support for customs control equipment existed.

In principle, there are two main sources for constructing the baseline / point of comparison. The first is the Commission’s ex-ante Impact Assessment, which was written in 2018 and analyses the problems the CCEI is intended to address. The second is the MEF data, as DG TAXUD intended to use the data provided by Member States in early 2022 as part of their applications under the first call to provide a baseline against which progress throughout the CCEI’s implementation could be measured. However, as described further below in this document, both sources are subject to issues and limitations. Nevertheless, by considering elements of both, this chapter aims to provide points which can be used to frame and interpret the evaluation findings.

The CCEI’s impact assessment

European Commission’s ex-ante Impact Assessments are often a useful source of information on the situation before an EU intervention was launched (i.e. the baseline scenario). However, in the case of the CCEI, the Impact Assessment⁶ was carried out jointly for four instruments and contains little information (and no quantitative data at all) specifically on the situation as regards customs equipment. With respect to the CCEI specifically, it asserts that, without a suitable EU intervention, “imbalances that exist between Member States, due to differences in the capacities and resources available”, and the fact that “several EU Member States suffer from the severe shortage of customs control equipment”, could not be effectively addressed.⁷ Such disparities in

⁶ European Commission (2018): Impact Assessment accompanying the document Proposal for a Regulation of the European Parliament and of the Council establishing the Asylum and Migration Fund; Proposal for a Regulation of the European Parliament and of the Council establishing the Internal Security Fund; Proposal for a Regulation of the European Parliament and of the Council establishing, as part of the Integrated Border Management Fund, the instrument for financial support for border management and visa; Proposal for a Regulation of the European Parliament and of the Council establishing, as part of the Integrated Border Management Fund, the instrument for financial support for customs control equipment. SWD(2018) 347 final

⁷ The Impact Assessment illustrates this point by using the example of customs services of the EU Eastern and South-Eastern Land Borders, where a 2017 Customs 2020 Programme activity found that 53% of the EU Customs BCPs lacked automated number plate/container number recognition systems (ANPRS) that would be

available control equipment allows customs "shopping", which only a "high degree of cooperation and coordination [...], ideally at Union level", could effectively address.

In view of this, the Impact Assessment provides relatively general information on the needs the CCEI is meant to address, but few specifics as to the extent of those needs. Data on this is being collected via the CCEI data model itself, as Member States are to submit data on the actual equipment that is available at BCPs and Labs as part of their funding applications. This data is reviewed and discussed in this next sub-section.

Inventory data

A useful point of comparison against which to assess the CCEI's progress is the pre-CCEI 'inventory data'. This refers to the existing customs control equipment, i.e. the equipment that Member States already disposed of, and which they were required to report as part of their CCEI applications (Sheet 3 in Part B). This data was to be provided by customs administrations showing the number and type of equipment available and/or in use at each BCP and customs laboratory. Due to the sensitive nature of this data the present analysis considers the aggregated data.

With respect to BCPs, as shown in table below, the total number of equipment available in the five main categories that are eligible for CCEI co-financing across the EU-27 was 6,480. Radiation and nuclear type equipment accounted for the highest number, with 2,900 pieces of equipment representing around 45% of the total equipment. They were followed by non-intrusive inspection equipment with 1,437 pieces (just over 22%). Trace detection and handheld search amounted to 980 (15%) and 962 (15%), respectively, of the available equipment. Field analysis and spectroscopy equipment represented the lowest number of equipment in absolute and relative terms, with 201 pieces of equipment representing a total of just over 3% of the total CCEI inventory across the EU-27.

Table 2: BCP baseline inventory data (2022)

Equipment category	Number of equipment	% of total
Field analysis and spectroscopy	201	3.1%
Handheld Search	962	14.9%
Non-intrusive Inspection	1,437	22.2%
Radiation and Nuclear	2,900	44.8%
Trace Detection	980	15.1%
Total	6,480	100%

needed for risk management; 46% of them lacked scanners for cargo and vehicle inspection of trucks and wagons; and 51% lacked personal hand control equipment.

The inventory data for equipment of customs laboratories is shown below. As can be seen, out of the total of 5,436 pieces of equipment, the largest proportion was “general” laboratory equipment, followed by analytical instruments and analysers, and chromatography equipment.

Table 3: Lab baseline inventory data (2022)

Equipment category	Number of equipment	% of total
Analytical Instruments and Analysers	1,340	24.7%
Chromatography	1,046	19.2%
General Laboratory Equipment	2,239	41.2%
Microscopy and macroscopy	178	3.3%
Spectrometry	633	11.6%
Total	5,436	100%

As regards relevant points of comparison, for several of the indicators that are included in the MEF, mid-term and long-term targets were defined (for 2024 and 2027, respectively). Where possible and relevant, these targets are considered as part of the analysis of progress in the ensuing chapters.

3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD?

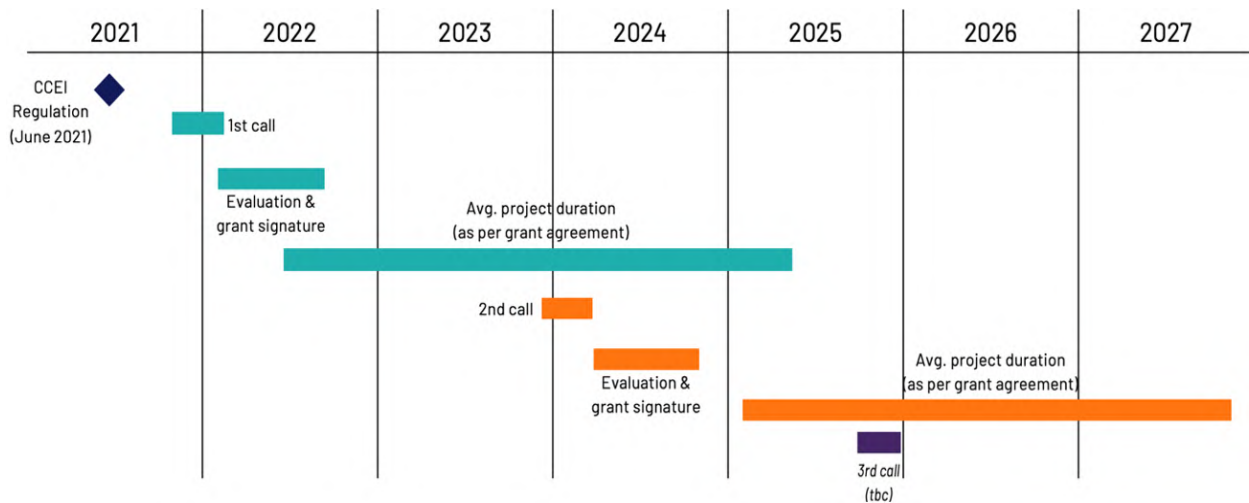
This chapter examines the implementation of the CCEI to date focusing on the two Multiannual Work Programmes (MAWPs) 2021-2022 and 2023-2024. It covers the objectives, priorities, funding, and outcomes of the first two calls launched in October 2021 and December 2023, respectively, alongside a preview of the anticipated third call in 2025. The first call addressed urgent equipment needs with a short-term focus, while the second aimed for long-term harmonisation of customs controls. The chapter details project progress, equipment acquisitions, funding distribution across Member States, and key developments, supported by figures and data on co-financing and (effective) implementation timelines.

General overview

The CCEI has developed two MAWPs to date, namely the 2021-2022 MAWP and the 2023-2024 MAWP, each with its own objectives, policy priorities, budget, and expected outcomes. The CCEI's implementation has been structured in two stages, with each stage supported by a separate funding call aligned with the respective MAWP.

The first call, launched in October 2021, adopted a **short-term approach**, focusing on the adequacy of equipment to address the most urgent needs and enhance the performance of customs controls. In contrast, the second call, launched in December 2023, took a **long-term perspective**, aiming to achieve the specific objective of ensuring adequate and equivalent levels of customs control results. The figure below puts the timing of the first two calls and their implementation in the context of the programming period.

Figure 2: CCEI Implementation to date



As of mid-2025, projects under the first call were being implemented, with some already completed. Meanwhile, most grant agreements for the second call were signed in late 2024. The time to grant deadline was 30 November 2024 and 42 out of 46 grant agreements were signed on time, with the majority of projects scheduled to commence in 2025⁸, one project finalised after

⁸ As of mid-2025, only one grant agreement remained to be signed.

the time-to-grant deadline and three projects not signed before the end of 2024 due to the countries' further internal considerations. All 27 Member States have been allocated CCEI funding through one or both calls, with most benefiting from financing in both instances. The following sections provides an overview of each call, highlighting the main priorities, key figures, and developments.

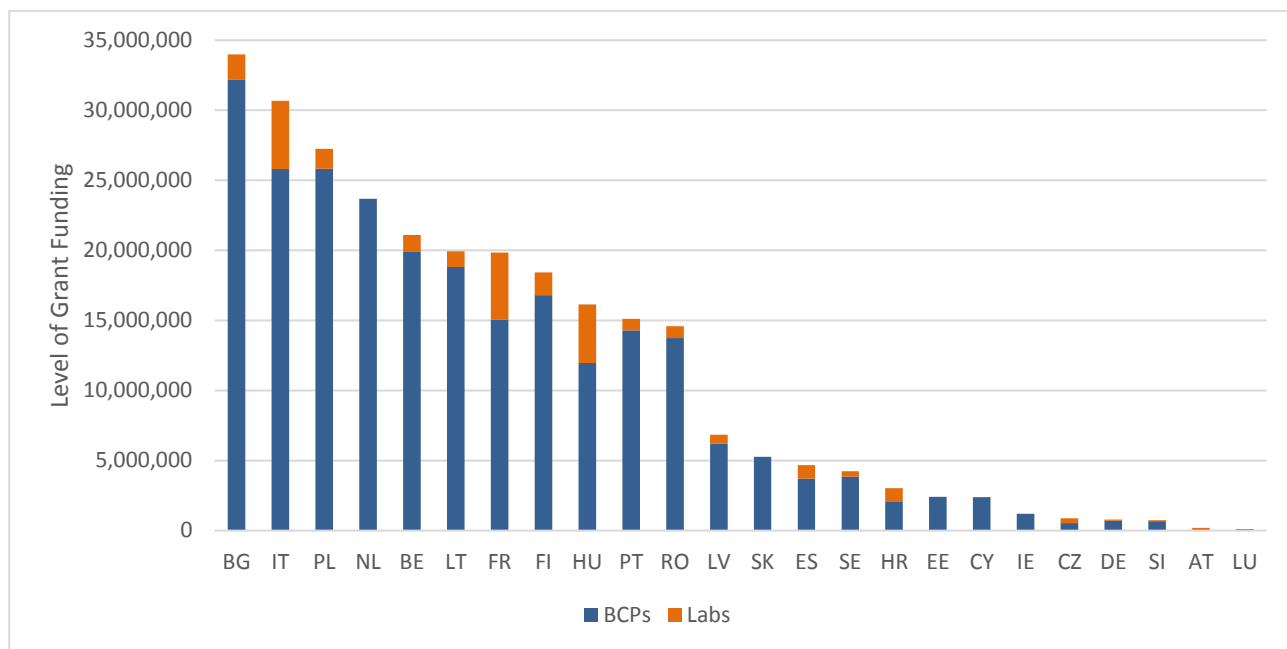
First CCEI call

The first call, introduced in October 2021 as part of the 2021-2022 Multiannual Work Programme (MAWP), had a short-term focus aimed at addressing the most urgent customs equipment needs of the Member States. In particular, it sought to fill gaps in equipment availability or meet clearly identified, unmet needs. This call prioritised three key policy areas: (i) strengthening and better equipping the Customs Union, (ii) enhancing Union added value through five strategic building blocks, and (iii) promoting innovation and sustainability. The call was set to finance the acquisition of equipment for Border Crossing Points (BCPs) and Customs Laboratories (Labs). Funding was limited to one project application per Member State, covering up to 20 work packages (one per BCP), and one project application covering up to five work packages (one per Lab). Moreover, the Call included a retroactivity clause allowing Member States to apply for co-financing of actions initiated since 1 January 2021.

Over the course of the first call, a total of 42 projects were selected for funding (from 43 applications). Grants were awarded to facilitate the procurement, maintenance, or upgrade of over 1,300 pieces of equipment for more than 210 BCPs and over 500 pieces of equipment for more than 30 Labs. Of the projects, 20 made use of the retroactivity clause. Regarding the type of equipment requested by Member States, the most requested items were radiation and nuclear detection devices, which are considered essential to ensure compliance of the customs controls with safety requirements as well as corresponding to emerging new threats and priorities. Additionally, a significant number of requests were made for Non-Intrusive Inspection (NII) Equipment and X-ray Scanners. To a lesser extent, requests were also made for field analysis, spectroscopy, and trace detection equipment. For Labs, the requests were less varied, with chromatography equipment being the most frequently requested, followed by general laboratory equipment and spectroscopy.

The total funding allocated to projects was EUR 273.5 million, just under the maximum Union contribution of EUR 273.7 million available. This funding was divided into EUR 247.2 million for BCP projects, with an average grant size of EUR 10.6 million, while Labs received EUR 26.2 million in total funding, with an average grant size of EUR 1.5 million. The sizes of individual grants varied widely, with maximum and minimum sizes for BCPs of EUR 32.2 million and EUR 37,900, respectively, whereas for Labs, they were EUR 4.9 million and EUR 79,200.

Figure 3: Overview of CCEI funding awarded per Member State after the first call



Regarding the distribution of grants, five countries – Bulgaria, Italy, Poland, the Netherlands, and Belgium – ranked among the top five in funding, being granted 50% of the total EU contribution supporting both BCPs and Labs. In contrast, Austria, Slovenia, Luxembourg, Germany, and Czechia were allocated the least funding. Additionally, three countries – Denmark, Greece, and Malta – did not apply for funding in the first call.

Implementation of proposal evaluation and grants preparation proceeded on schedule. The average "time to inform" (TTI) – the time taken to notify beneficiaries about the outcome of their proposal – was 125 days after the closing date for the call, which is 58 days ahead of DG TAXUD’s target. Furthermore, the average “time to sign” was 124 days, without a specific target, while the average "time to grant" (TTG) was 251 days from the call closing, which is 24 days before the target.

The grants approved in the first call had durations initially set at ranging from 12 to 36 months, with an average of 31 months. Over half of the projects – 29 in total (69%) – had durations of 36 months, while 13 (31%) had a shorter duration, with six (46%) of them lasting 24 months. From the 42 first call projects as of May 2025, twenty (47.6%) had an amendment extending the duration of the grant agreement. The extensions range from a period of three to thirty months, making some project last five years and one even five and a half years. Additionally, some amendments focused solely on changes to the type of equipment to be purchased or the designated BCP for deployment. As of August 2025, 12 projects have been completed (29%) with an approved final project implementation report. Most of the remaining projects (13) are now expected to finish in 2025, while 12 are projected to conclude in 2026 and four in 2027.

Regarding the equipment itself, based on data submitted by the Member States, by the end of 2024, a total of 907 pieces of equipment had been purchased, maintained, or upgraded through CCEI funds. Regarding BCPs, 573 pieces of equipment have been co-funded, the majority being new purchases (546 purchased, 20 maintained, and 7 upgraded), representing 41% of the total

target under the first call. For Labs, even greater progress has been made, with 334 pieces of equipment supported (299 purchased and 35 maintained), reaching 64% of the target. The highest numbers to date correspond to radiation detection and nuclide identification equipment (227 units purchased, maintained, or upgraded) and non-intrusive inspection equipment (175 units) for BCPs, as well as analytical instruments and analysers (110 units) for Labs.

Second CCEI call

The second call, launched under the 2023-2024 MAWP and closed in February 2024, focused on the long-term harmonisation of customs controls. It was designed to encourage the multi-purpose use of funded equipment to achieve five priorities: (i) ensuring safety and security, (ii) strengthening customs authorities' ability to manage and adapt to international crises, (iii) addressing the challenges posed by the exponential growth of e-commerce, (iv) contributing to the European Green Deal, and (v) advancing innovation in customs control equipment, particularly regarding interoperability.

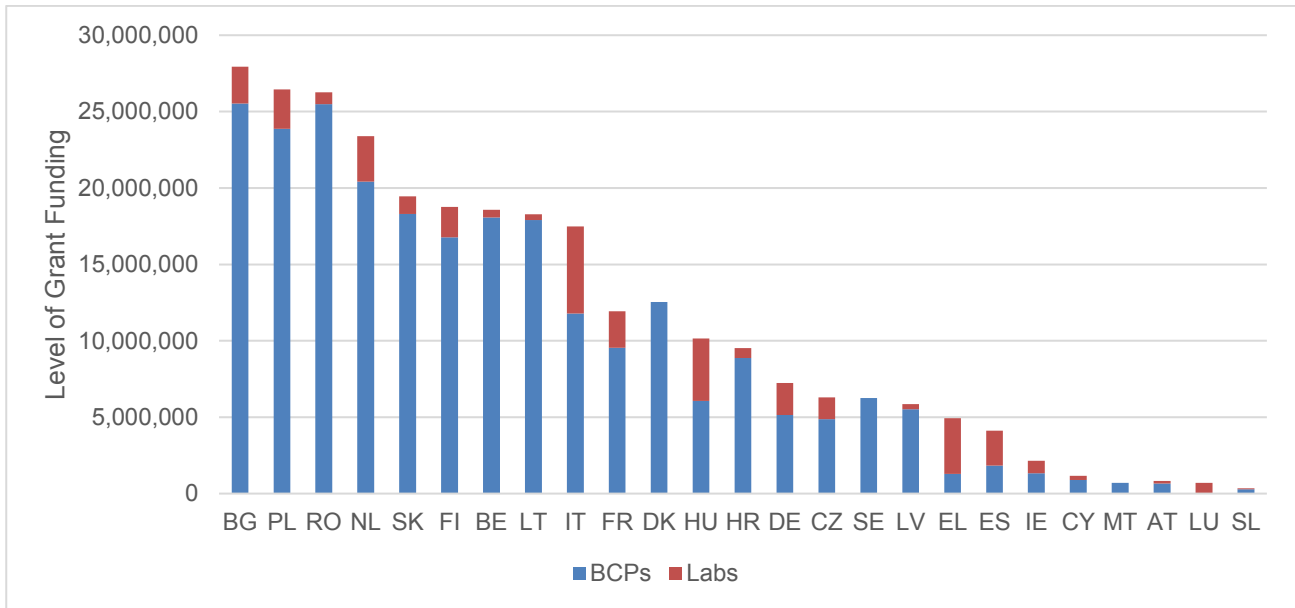
This call was informed by the data collected in the first call, which aimed to map comprehensively the entire Customs Union. Building on this data and the five identified priorities, DG TAXUD provided tailored guidance on equipment for BCPs and Labs for each Member State. As a result, the second call was designed to be implemented in a more targeted manner.

Security, including cybersecurity, of the equipment funded by the Instrument—identified as a key concern from the programme's outset—took on greater importance for this call. Security requirements for the equipment were further strengthened in this regard, with each BCP work package required to demonstrate how it addresses this aspect.

As in the previous call, in the second call Member States were asked to submit separate applications for BCPs (with up to 20 work packages) and Labs (with up to five work packages). After the evaluation of the submitted proposals 47 projects (from 47 applications) from the second call had been selected for funding, 25 of which were for BCPs and 22 for Labs.

In total, Member States requested over EUR 303 million in grants, 86% of which was for BCPs. In the case of Labs, funding requests saw an increase of over 50%. Given that the financial envelope for grants was around EUR 284 million, the call was oversubscribed in terms of the level of funding. While all applications were accepted, 23 of them had their budgets reduced. The average grant size awarded by the EC was approximately EUR 6.2 million (EUR 9.9 million for BCPs and EUR 1.7 million for Labs). As with the first call, grant sizes were very diverse, ranging from EUR 285,360 to EUR 25.5 million for BCPs, and EUR 64,000 to EUR 5.7 million for Labs.

Figure 4: Overview of CCEI funding recommended per Member State after the 2nd Call



The second call, similarly to the first one, proceeded mostly on schedule, albeit with some delays. More specifically, the average "time to inform" was 124 days after the second call's closing date, 59 days ahead of the DG TAXUD target. The average "time to sign" was 133 days, not taking into account four grants that experienced additional delays for various reasons outside the control of DG TAXUD⁹. The average "time to grant" was 257 days from the call closing, 18 days ahead of the target – also without the above mentioned four grants.

Project length is more standardised compared to the first call. 87% of the projects have a set duration of 36 months (projected to end in the period 2027-2028) – the longest timeframe – leading to a slight increase in the average duration (33,6 months) than in the first call.

Considering participation across the two calls, three countries – Bulgaria, Poland, and the Netherlands – have been the top recipients, ranked among the top five in terms of grant funding on both occasions. Additionally, Denmark, Greece, and Malta, which did not participate in the first call, took part in the second. In contrast, Estonia and Portugal participated in the first call but not in the second.

Third CCEI call

Looking ahead, the third CCEI call is planned to be launched in 2026, following the adoption of the next CCEI Work Programme. The European Commission Communication "A comprehensive EU toolbox for safe and sustainable e-commerce" provides some insights into the

⁹ The four grants are as follows: two to Belgium (one for BCPs and one for laboratories), one BCP grant to Bulgaria, and one BCP grant to Luxembourg. The signature of the two Belgian grants were delayed after a request from the applicant Member State. The signature of the Luxembourgish grant was delayed as the Member State was invited for grant preparation starting in December 2024.

possible third call.¹⁰ The Communication outlines the European Commission's strategy and proposed measures to address the challenges posed by the rapid growth of e-commerce, particularly the import of low-value goods directly shipped to consumers in the EU. According to the Communication, the CCEI Work Programme 2025 is likely to include “a dedicated call on e-commerce with a budget of EUR 100 million”. The purpose of this call would be to support the enforcement of customs controls and the detection of non-compliant and dangerous products imported through e-commerce.

¹⁰ European Commission. (2025). *A comprehensive EU toolbox for safe and sustainable e-commerce* (COM(2025) 37 final).

4. EVALUATION FINDINGS (ANALYTICAL PART)

This chapter presents the main findings of the interim evaluation that assessed the performance of the CCEI against the five evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added value. The overall analysis is based on evidence from both the supporting study and the Commission's own sources. The responses to the individual evaluation questions can be found in Annex 3).

4.1 To what extent was the intervention successful and why?

The answer to this question is based primarily on the assessment of the **effectiveness** of the CCEI, i.e. how successful it has been in achieving or progressing towards its objectives, and why. To assess this, the evaluation explored the implementation and use of the CCEI to date; the design of the instrument; the pace of progress made by CCEI-supported projects and the reasons for delays; the early outputs and emerging results; and the extent to which the available funding has been allocated in a way that targets key needs and risks. In addition, the response considers the CCEI's **efficiency**, in particular whether the timeframes, costs and burdens are minimised to the greatest extent possible without hampering the instrument's ability to achieve its objectives; and its **coherence**, both internally and with regard to its alignment with other relevant EU policies and programmes.

Two waves of projects to date have seen the CCEI used by all Member States

The activities foreseen under the CCEI have been rolled out broadly as anticipated. To date, two Multi-Annual Work Programmes (MAWPs) and corresponding calls for proposal have been issued under the CCEI. All 27 Member States have now received CCEI funding (22 under both calls, two only under the first and three only under the second call). The Member States that did not participate in the first call (Denmark, Greece and Malta) provided broadly similar reasons for this – namely, a lack of preparedness within the customs administration to deal with the requirements of preparing and submitting a proposal within the time available, and/or the absence of a comprehensive needs assessment that could be used to determine what additional equipment should be procured. In one case, there was reportedly also a sense within the administration that the country did not really need additional resources for customs control equipment. All three Member States did take part in the second call, based on a more detailed understanding of their needs and gaps that they had developed in the meantime, and/or a re-assessment of their priorities. The Member States that did not participate in the second call (Estonia and Portugal) did so because of delays in finalising their projects under the first call, which led them to decide they lacked the internal resources to embark on additional projects for the time being.

Under each call, the majority of Member States applied for funding for equipment for both BCPs and laboratories, but a few went for only BCPs. Overall, the majority of Member States applied for significantly less funding than the maximum of 15% of the total budget available. Under the first call, on average the participating Member States applied for around EUR 11.4 million of co-financing (compared to the maximum of EUR 40.7 million). The amounts applied for were a little but not significantly higher under the second call. As a result, as shown in the table below, under both calls the demand for funding was only slightly greater than the supply: the first call was oversubscribed by less than 1%, and the second by 8%. Demand for support for BCPs was a little higher than the 80% of the total call budgets that had been earmarked for this, and demand

for laboratories was lower than the 20% that were set aside. Funds were flexibly re-allocated in line with demand to ensure optimal budget utilisation.

Table 4: Aggregated demand for CCEI co-financing per call

	Amounts available and applied for (in EUR)	
	First call (2021-2022)	Second call (2023-2024)
Available budget for BCPs	217,211,200	227,170,400
<i>Applied for BCPs by MS</i>	<i>247,193,266</i>	<i>266,382,600</i>
Available budget for laboratories	54,302,800	56,792,600
<i>Applied for laboratories by MS</i>	<i>26,282,097</i>	<i>40,726,128</i>
Available budget – Total	271,514,000	283,963,000
<i>Applied for by MS – Total</i>	<i>273,475,363</i>	<i>307,108,728</i>

The information gleaned from questionnaire responses, interviews and case studies confirms that Member States took different approaches to their applications, and this is reflected in the amount of co-financing they requested. In response to the first call, some submitted highly ambitious projects that clearly went above and beyond what they would have been able to procure without CCEI support. Other Member States opted for a more cautious approach, for various reasons, including a lack of familiarity with the Instrument, and uncertainty about their ability to secure national funds beyond what had already been approved for existing plans to purchase customs control equipment. They chose to only apply for relatively modest amounts of EU co-financing. However, in several cases, Member States became more proactive and ambitious in the second call, applying for higher amounts for more expensive equipment that would have been challenging to finance solely through national budgets. On the other hand, difficulties and/or delays encountered in projects under the first call appear to have led a few Member States to scale back their ambitions under the second call, or even not participate at all.

The fact that the CCEI has now been / is being used by all 27 Member States confirms it is seen as a valuable and relevant instrument by customs administrations across the EU. On the other hand, the fact that the level of demand under both calls to date has been relatively low (only marginally higher than the available budget) shows that the absorption capacity of Member States is not unlimited.

Overall design of the instrument appropriate and effective

By and large, the design of the CCEI has proven to be appropriate and fit for purpose. There is no evidence to suggest that any of the main design elements – including the available budget, co-financing rate, eligibility criteria and priorities, and the management and implementation framework – have acted as a significant constraint to the implementation of the CCEI, with beneficiaries (namely the national customs administrations of the EU Member States) providing almost entirely positive feedback on all of them.

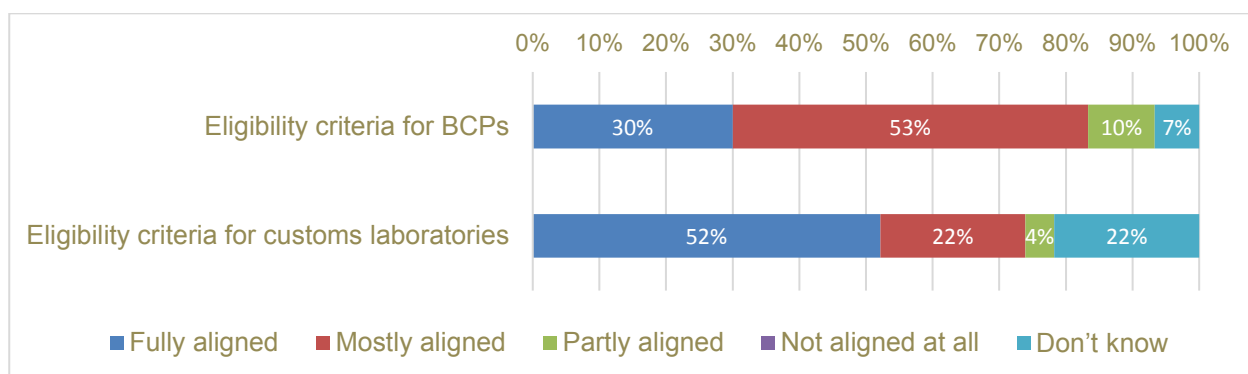
The CCEI budget has been considered adequate. Over 90% of respondents to the questionnaire for national customs administrations agreed (almost half of them “strongly”) that the CCEI budget is sufficient to fill performance gaps and make a difference to customs controls in their

Member State. The fact that the demand for co-financing has been so closely aligned with the supply provides further evidence that the amount of funding available is sufficient to meet the Member States’ main needs.

As for the co-financing rate (up to 80% of the total eligible costs of an action), several national customs administrations reported that obtaining the remaining 20% from national budgets can be challenging, which has constrained the scope and level of ambition of some projects under the first and second calls. Only 55% of questionnaire respondents agreed – and 19% disagreed – that it is straightforward to obtain approval for the co-funding needed at national level to take part in the CCEI. A few noted that a higher co-financing rate (potentially even 100%) would help to encourage Member States to procure more highly innovative, cutting-edge (and thus expensive) equipment. On the other hand, most acknowledged that the co-financing rate is already quite generous, and that it would be unrealistic to expect the EU to purchase equipment for BCPs and laboratories without any national contribution (since EU programmes typically require co-funding as a way of incentivising engagement and buy-in).

National customs authorities had a mostly positive view on how the eligibility criteria align with their equipment needs and priorities. Based on their questionnaire responses, the level of alignment is especially high for laboratory equipment, but only 30% found the criteria for BCP equipment to be “fully” aligned with their needs.

Figure 5: To what extent do the eligibility criteria align with the equipment needs and priorities of your administration?



Source: Questionnaire responses from national customs administrations

Member States identified additional needs that are not or only partly eligible under the current criteria. The main gaps are listed below.

Several Member States saw the ineligibility of costs associated with infrastructure and/or training as a constraint, since some equipment can only be used (effectively) if the relevant infrastructure (e.g. new lanes for lorries) and/or suitably qualified staff is available. A few interviewees believed that this might lead some administrations to prioritise relatively easy to use and install (in particular mobile or handheld) equipment when applying for CCEI funding, even if more advanced equipment would align more closely with needs, other things being equal.

- Several Member States applied (or would have liked to apply) for co-financing for IT equipment (including both hardware and software) that can facilitate the effective functioning of BCP equipment, in particular by enabling the connection between,

integration, centralised control and/or analysis of equipment at, and data / images from, different BCPs. However, such equipment is not eligible, and the associated costs were therefore excluded from CCEI grants.

- A few Member States expressed disappointment that the inclusion of maintenance costs for existing equipment were not allowed under the second CCEI call that limited this possibility for new equipment and equipment purchased under the first call.¹¹
- More generally, a few administrations argued that the eligibility criteria should be defined more flexibly and dynamically, to better allow for the inclusion of cutting-edge, innovative, potentially “game changing” technologies such as AI-powered systems or drones.

It should be noted that some of these apparent “gaps” in terms of what is eligible for CCEI funding can potentially be addressed via other EU programmes and funds, including the EU Anti-Fraud Programme (which a few Member States reported having used to co-finance e.g. IT equipment) and the Recovery and Resilience Facility (which at least one Member State was considering using to help fund infrastructure necessary to install and operate equipment purchased through the CCEI).

The framework for implementing the CCEI (including the process for defining the priorities, the work of the CCEI Coordination Group, and in particular the guidance provided by DG TAXUD) were viewed favourably by beneficiaries, and there are no indications that this has in any way hindered progress. In interviews, almost all national customs authorities were complimentary of the way the Commission manages the instrument, and especially of the hands-on support provided, and of the flexibility and pragmatism shown, by DG TAXUD project officers.

There are no concerns about the internal coherence of the CCEI, i.e. the extent to which its various elements are coherent with one another. The CCEI is designed as a relatively “simple” instrument, which provides financial support for a single core type of activity (namely, the purchase, maintenance and upgrade of customs control equipment by the national customs administrations of the 27 EU Member States) according to a clear and sound intervention logic. The supporting activities (including the meetings and deliverables of the CCEI Coordination Group, and the guidance and technical and administrative support provided to applicants and grantees by DG TAXUD) are consistent with the instrument’s logic and objectives.

Significant delays caused primarily by problems with national procurement

Many of the projects that were supported by CCEI grants under the first call are subject to delays. In May 2025 twenty of the 42 projects (47.6%) under the first call experienced a duration extension. Over half (53%) of the projects have been progressing slower than expected according to the responses by national customs administrations to the questionnaire.

The main reasons for these delays were external, i.e. not related to the design or management of the CCEI as such. By far the most significant external factor that has hindered the progress made

¹¹ In the first CCEI call maintenance costs were eligible for existing equipment (up to 20% of the total eligible cost). In the second CCEI call, for BCPs maintenance cost eligibility is limited to equipment purchased under the CCEI. For Labs, maintenance costs are eligible for all existing equipment, just like in the first call.

by CCEI projects to date are difficulties experienced with completing the procurement procedures at national level. Only 52% of national customs authorities who responded to the questionnaire agreed that procurement processes at national level function sufficiently well to allow the effective purchase of the equipment in question. Member States reported problems with cumbersome procedures involving multiple permits and approvals, a lack of experts and human resources in the national procurement units, uncertainty about if and how to exclude certain suppliers due to cybersecurity concerns, a lack of bidders, appeals or complaints from unsuccessful tenderers, and budget freezes as factors that slowed down the procurement of equipment. Moreover, the case studies showed that these problems were especially prevalent in larger projects that sought to procure high volumes of equipment, and in projects that targeted equipment that was new and/or innovative for the customs administrations in question, and with which they therefore had no or only limited procurement experience.

A few Member States also mentioned having encountered supply issues, including extended delivery timelines for equipment at a particular point in time, and rising prices for certain types of equipment. In the relatively few cases where there seem to have been supply problems, bottlenecks may have been partly caused – according to some interviewees – by a simultaneous surge in demand for certain types of equipment from several Member States due to the CCEI. However, this does not appear to have been a very widespread or significant constraint for most projects, and 84% of respondents to the questionnaire for national customs authorities agreed that the required equipment is available on the market.

Geopolitical challenges and cybersecurity concerns have affected the CCEI

In three of the ten case studies, as well as in several other projects, cybersecurity concerns were reported to play a significant role. Specifically, there have been and continue to be significant concerns (linked primarily to a specific supplier from China) that sensitive data from scanning equipment and services could be leaked to unauthorised users. In recent years, as concerns have emerged and intensified, attempts have increasingly been made to assess the risk profiles of the manufacturers and restrict them, if deemed necessary, from procurement procedures for sensitive equipment, and especially to ensure that only secure solutions benefit from EU (including CCEI) funding. However, several Member States have reported difficulties with achieving this in practice, with national legislation reportedly offering different, more or less effective, ways of addressing the concerns. At EU level, security and cybersecurity protection of the equipment funded was reaffirmed in 2023 through the work carried out under the CCEI Coordination Group, and further clarified in the 2023-2024 CCEI MAWP and in the second call for proposals, which provided additional requirements and guidance to increase the stringency of security and cybersecurity requirements, and required the granting authority to involve national security services and to request substantiating documentation of compliance with reference to key security requirements (including the NIS2 Directive¹² and security guidance issued by the Commission). Nonetheless, some national customs administrations reported a continued lack of legal certainty in this area. In certain countries, procurement processes had to be cancelled, re-launched and/or specifically re-designed to avoid results deemed incompatible with national security priorities.

¹² Directive (EU) 2022/2555 on measures for a high common level of cybersecurity across the Union.

During interviews, manufacturers of customs control equipment also noted difficulties navigating different rules and procedures across EU Member States, particularly for more sensitive technologies, and expressed a desire for clearer guidance on topics like licensing requirements, cybersecurity standards, and how to get new technologies approved for CCEI funding. Several manufacturers expressed concern about competition from non-EU (particularly the above-mentioned Chinese) suppliers based primarily on price, and expressed a desire for procurement criteria to give more weight to factors like security, quality, and European content, rather than focusing primarily on price (which is also in line with the Commission guidance provided to the Member States). Some also suggested incentives or preferences for Europe-based manufacturers to support EU strategic autonomy in this sector.

Another geopolitical factor that has affected the implementation of the CCEI is the Russian full-scale invasion of Ukraine, which has significantly influenced the customs control equipment procurement strategies and priorities of certain Member States, especially those that share a border with Ukraine, Belarus or Russia. In response, the MAWP 2023-2024 included the priority “Mitigating international conflicts and crises”, with a specific emphasis on equipping BCPs to correctly implement the sanctions imposed against Russia under elevated customs security risks (in other words, shifting focus from controlling imports to controlling exports), as well as performing the necessary controls to enable the flow of trade through the EU-Ukraine Solidarity Lanes. But some projects under the first MAWP and call were also affected by these factors; for example, the closure of Finland’s Eastern border necessitated substantial changes to its BCP project, and led the Finnish customs authority to re-focus the equipment away from land BCPs bordering Russia and Norway, and towards ports in Western Finland; these changes were the main reason for the delayed implementation of the project. Similarly, Poland reported that the purchase of equipment for a specific BCP was abandoned due to the combined effects of the COVID-19 pandemic and the Russian invasion of Ukraine. On the other hand, some countries including Bulgaria and Slovakia reported that the CCEI had already helped them address challenges resulting from the war.

The combination of these external factors (problems with national procurement, the geopolitical challenges and cybersecurity concerns) made it necessary to amend a significant number of grant agreements. The majority of these imply an extension of the project duration, some also involve changes to the equipment to be procured, some (but not all) of which have decreased the maximum grant value. During interviews, national customs authorities provided mostly positive feedback on how DG TAXUD has handled amendments, variably describing its approach as flexible, pragmatic and proactive.

Early outputs and emerging results, but difficulty of measurement

Despite the delays and implementation hurdles described above, the CCEI has begun to deliver tangible outputs. Based on the data submitted by the Member States, by the end of 2024, 907 pieces of equipment had been purchased, maintained or upgraded through CCEI funds (indicator OP 1.1). Once all projects under the first call are completed, these numbers are expected to more than double. The highest numbers to date correspond to ‘Radiation detection and nuclide identification’ (227 units purchased, maintained or upgraded) and ‘Non-intrusive inspection’ (175 units) equipment for BCPs, and ‘Analytical Instruments and Analysers’ (110 units) for laboratories.

Table 5: Pieces of equipment purchased, maintained or upgraded through CCEI funds

	Equipment supported by the CCEI (as of end 2024)				Target under call 1	% of target achieved
	Purchased	Maintained	Upgraded	Total		
BCPs	546	20	7	573	1,398	41%
Laboratories	299	35	0	334	524	64%
Total	845	55	7	907	1,922	47%

DG TAXUD also collects data from Member States on the ‘occupancy rate’ of the CCEI-funded equipment (indicator OP 1.2), indicating the frequency of its use (a 100% occupancy rate means “daily use”). Analysis of the 2024 data reveals that the actual usage is closely aligned with the targets for all equipment types. Equipment at BCPs is used very frequently, with occupancy rates above 90% for most categories of BCP equipment. Occupancy rates of laboratory equipment tend to be a little lower (between 50 and 70%), but also in line with targets. This suggests that, overall, the equipment is used extensively and in line with expectations.

However, judging – let alone measuring quantitatively – the results and impacts of the CCEI is difficult given the early stage of implementation. The experience gathered to date shows that all of the results indicators defined in the MEF are subject to significant challenges and limitations as regards the completeness, quality and/or comparability of the underlying data.¹³

Indicator RES 1.1 is intended to measure the specific results achieved by Member States through use of CCEI funded equipment, by comparing actual results with MS’ commitments (with reference to baselines or targets, e.g. in terms of the number or value of seizures of different types of goods or substances, the number of controls conducted or the hit rate). The available data shows limited progress, with only between 10% and 21% (depending on the objective) of commitments achieved as of 2024. However, it needs to be re-emphasised that the quantity and quality of the data is poor due to significant reporting issues and inconsistencies, meaning the results should not be taken at face value.

Indicator RES 1.3 attempts to measure the degree of adherence of BCPs’ equipment to the common list of equipment that should be available per type of BCP. It is calculated by comparing the data provided by the MS regarding the equipment that is available and the main risks encountered, with targets for recommended equipment levels per BCP. The available data shows a small increase in the adherence rates (i.e. the proportion of BCPs that have the recommended equipment) for all types of BCPs from the baseline (2022) to 2024, but the rates remain low. Between 9% and 17% for air, land, postal, rail and sea BCPs have the recommended equipment levels that is far below the 60% target set for 2024. These consistently low rates indicate that the targets as defined are likely to be unrealistic, i.e. overly ambitious, and not sufficiently taking into account specificities of individual BCPs and the prevalent risks.

¹³ It should be noted that impact indicators have also been defined. However, changes in these indicators will take even longer to emerge, and are even more difficult to attribute to the CCEI; they are therefore not included in the Annual CCEI Reports published to date, or considered for the sake of this interim evaluation.

Indicator RES 1.4 is about the coverage of risks and threats, and more specifically, the extent to which BCPs have the necessary equipment available to mitigate identified financial and non-financial risks. Based on the available data for 2024, the coverage rates vary significantly between types of BCPs and risks. Overall, mobile BCPs generally demonstrate the highest coverage across the spectrum of risks and threats considered, suggesting greater effectiveness in risk mitigation compared to other types of BCP. However, the data limitations mean care needs to be taken when interpreting these results.

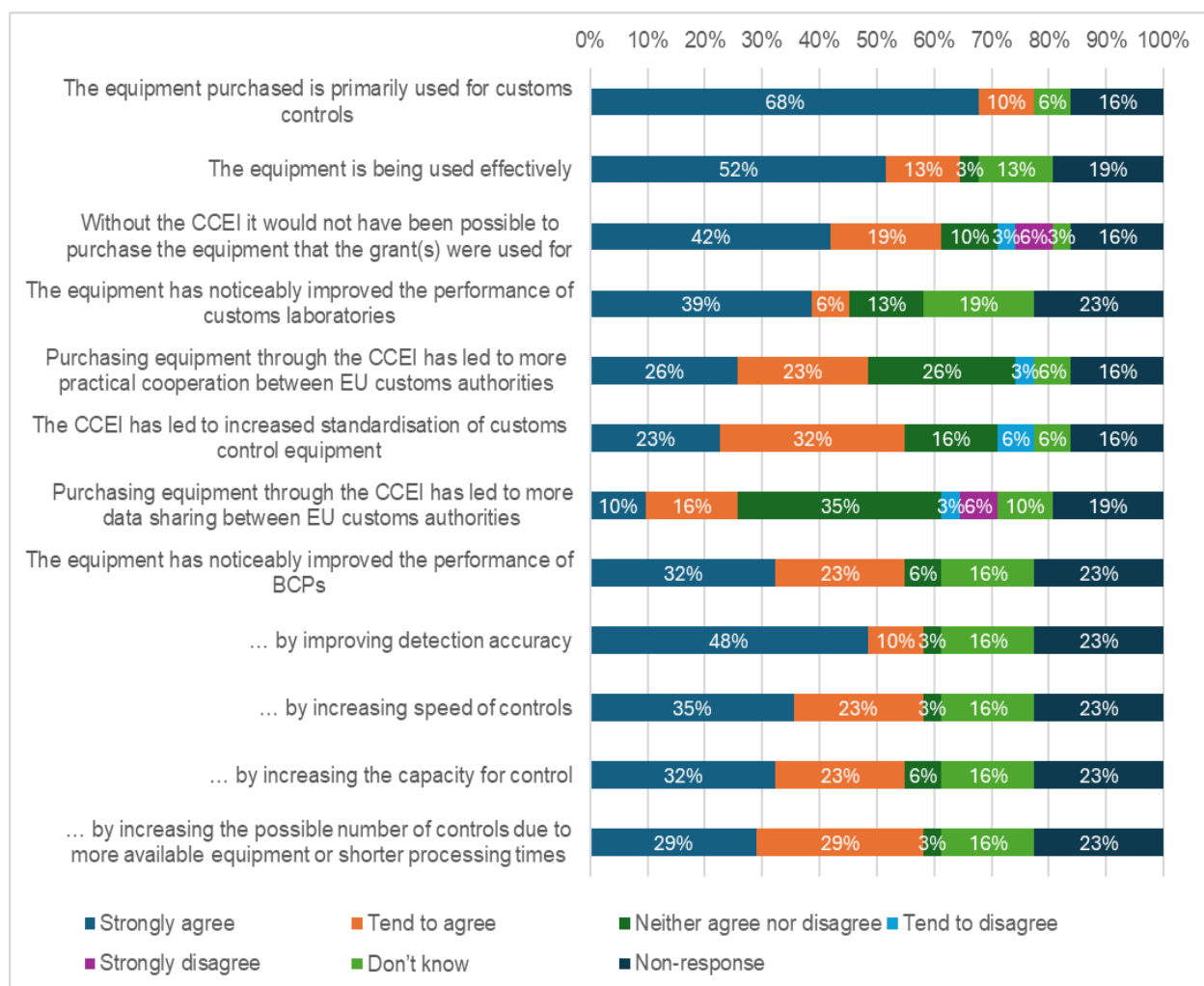
The evaluation attempted to shed further light on the results achieved to date, and on whether the CCEI is on track to generating additional results in line with expectations over the remainder of the programming period, via the questionnaire, interviews and case studies. In the questionnaire, Member States were asked to rate, based on their experience of the CCEI so far and expectations for the rest of the programming period to 2027, its likely contribution to its specific objective, which is to “contribute to adequate and equivalent results of customs controls through the transparent purchase, maintenance and upgrading of relevant and reliable state-of-the-art customs control equipment that is secure, safe and environmental-friendly, thereby helping the customs authorities act as one to protect the interests of the Union”. Nearly three quarters (74%) of respondents believed that the CCEI would make a “significant” contribution toward this objective; the remainder expected “some” contribution (16%) or responded “don’t know” (10%). Not a single respondent believed the CCEI would make only a “small” or no contribution at all.

National customs administrations were also asked a series of questions about the results achieved so far. The responses (see figure below) suggest that the equipment that has been purchased and deployed to date is being used effectively and as intended. The majority of respondents reported that the equipment has already noticeably improved the performance of both BCPs (especially by improving detection accuracy, but also by increasing the speed of, capacity for and possible number of controls) and customs laboratories, although it is worth noting that there were a relatively high number of neutral or “don’t know” responses to these questions.

The data on relevant performance metrics that is available for the (few) projects that have been finalised shows the difficulties of quantitatively measuring and substantiating such improvements. For example, in the case of the Spanish BCP project, which was finalised in September 2024, the final report includes data on the number of controls, average process time, and % hit rate at the 16 BCPs that received the equipment. This shows that all of these metrics increased at most but not all BCPs. According to Spanish customs, the reasons for the variations can be manifold, and include changes in traffic volumes (e.g. significant increases in traffic can lead to longer average processing times). But it is also clear that some metrics are open to interpretation, in particular the hit rate, which can be influenced by many factors (including possible deviations of illicit traffic flows to other BCPs). It was also noted that, when an old scanner is replaced with a newer one, one would not necessarily expect to see a change in (all of) the metrics. Overall, in the Spanish case, interviewees felt that the lack of progress on certain indicators does not necessarily mean the equipment in question is not used effectively. Other national customs administrations responded along similar lines. Some also provided examples of how the CCEI had facilitated more effective and efficient controls that may not be picked up by relatively crude standardised metrics. For example, CCEI support enabled Sweden to acquire large, fixed scanners for certain key BCPs, and allowed it to redeploy existing mobile scanners to other BCPs, reportedly resulting in a more efficient overall distribution of resources; while Germany's acquisition of new substance detectors expedited control procedures at BCPs by reducing reliance on laboratory analyses.

On the other hand, there were lower levels of agreement that the CCEI has led to increased standardisation of equipment, more practical cooperation and/or data sharing between EU customs authorities. These are not explicit objectives of the CCEI, but are nonetheless areas where the Instrument was thought to have the potential to make a contribution. However, they are not aspects that have been the focus of projects and grants under the first call. On the issue of the lack of standardisation, several manufacturers of customs control equipment who were interviewed noted that different countries have varying specifications for similar equipment, which can lead to inefficiencies and increased costs. On the other hand, a few representatives of Member State customs administrations warned that, while a certain level of standardisation may be desirable for certain types of equipment, full-scale standardisation of, for example, scanning equipment across the EU would fail to take into account the sometimes varying national needs, and could imply security risks, as criminals could also adapt to and learn to take advantage of such common standards.

Figure 6: If your customs administration has already purchased and deployed customs control equipment using one or more CCEI grants, please provide your insight on the results achieved so far?



Source: Questionnaire responses from national customs administrations

Finally, it is worth considering the extent to which the CCEI has contributed to the procurement of modern / innovative equipment, and ensured the equipment is secure and safe (in terms of protection of data, cyber-resilience) and environmentally-friendly (including as regards the disposal of the replaced equipment). Taking these elements in turn, the questionnaire responses from national customs authorities suggest the situation varies somewhat:

- 91% agreed (incl. 52% “strongly”) that the CCEI encourages and facilitates the purchase of innovative, cutting-edge equipment.
- 87% agreed (incl. 58% “strongly”) that implementation of the CCEI takes due account of safety and environmental considerations.
- 77% agreed (incl. 42% “strongly”) that implementation of the CCEI takes due account of data protection, cyber-resilience and the security of the equipment purchased.
- However, only 67% agreed (incl. 35% “strongly”) that all aspects related to the equipment, including its security, could be covered by the current procurement rules.

This suggests that, while beneficiaries (i.e. national customs) agree with the importance of all these aspects in principle, in practice they do not always play an (equally) important role in projects and procurements. The case studies and interviews show clearly that some but not all of the equipment procured is innovative or cutting-edge; environmental considerations are usually considered but rarely as a decisive factor; and while cybersecurity is generally taken very seriously, many customs authorities felt ill-equipped to effectively address concerns in this respect.

Targeting funds at key needs and risks: a work in progress

An important element that needs to be taken into account to evaluate the effectiveness of the CCEI is the way needs are assessed and used to determine the allocation of funding. As per the CCEI Regulation (recital 24), “implementation should be supported by assessments of needs” with the involvement of national customs authorities and based on a clear methodology; the Commission should use this information to determine the allocation of the funds to Member States, taking into consideration factors including volumes of trade, relevant risks, and the administrative capacity of the customs authorities. To contribute to budgetary discipline, “the conditions for the prioritisation of grants should be clearly defined and based on such an assessment of needs”, driven by data on the available customs control equipment at each BCP, compared with a common list of equipment that should be available (Article 11(4)).

Priorities are defined in each MAWP to address specific needs. The first (2021-2022) MAWP and call corresponded to a short-term approach dedicated to addressing the most urgent needs and raising customs control performance. To facilitate this, the priorities were kept very general and flexible, and Member States were allowed to apply for funding retroactively (i.e. include costs that had already been incurred) to compensate for the late adoption of the MFF and, consequently, the CCEI Regulation. The second (2023-2024) MAWP and corresponding call were based on a “comprehensive mapping of the entire Customs Union to determine areas that need particular attention”, based on the data collected from Member States in the first call. This showed that there were still urgent needs (in terms of missing and inadequate equipment), and meant it was “essential to identify concrete policy priorities to ensure targeted and efficient use of the available funds.” The priorities of the second call were narrowed to focus on more specific

policy areas, namely (1) Safety and Security; (2) Mitigating international conflicts and crises; (3) e-Commerce; (4) Building Green Capabilities; and (5) Interoperability & Innovation. For the Safety and Security priority, the call explicitly required “mandatory coverage of at least one of the relevant risks/threats.” Thus, while the second call aimed to introduce an increased focus on specific priorities informed by actual needs, it should be noted that most (if not all) types of eligible equipment could still be reasonably justified as addressing at least one, and potentially several of the five priorities. As such, these priorities did not significantly limit the types of equipment which Member States could focus on in their applications for co-financing.

Focusing the available funding at the most significant needs is meant to happen at the level of individual proposals and projects, by ensuring the evaluation of applications duly considers the extent to which the equipment Member States apply for responds to the main risks and needs. In theory, this is achieved via the award criteria, in particular “Relevance” and “Added value”, which should ensure that the projects that are most closely aligned with the identified needs achieve higher scores, and are thus prioritised for funding.

However, in the first call, in practice this prioritisation only happened to a very limited extent, for the following main reasons:

- Very broad priorities: As noted above, the first call was designed to help Member States address their most urgent equipment needs and raising performance overall. Therefore, national customs authorities were free to apply for any eligible equipment. The case studies show that different Member States took different approaches, with some but not all of them focusing on the highest risks. Many projects included equipment that had to be replaced or added for different reasons (in several cases taking advantage of the retroactivity clause), but not necessarily for especially high-risk BCPs.
- No competition: The requested funding for the first call almost exactly matched the total budget available, meaning there was essentially no competition for funding, and hence no need for the Commission to prioritise proposals or work packages that were more aligned with key needs or risks over others that were less aligned. In essence, Member States received co-financing for whatever equipment they chose to apply for, as long as it was eligible under the CCEI criteria and the applications met minimum quality thresholds.
- Issues with the data: The data on which needs assessments are to be based – including what equipment is currently available at each BCP, compared with what should ideally be available in view of traffic volumes and risk profiles – is to some extent fraught. Member States frequently struggled to interpret and provide all of the data that was requested, leading to concerns about its comprehensiveness, reliability and comparability. In addition, the “ideal” list of equipment per BCP as defined (which forms the basis for the “adherence” indicator RES 1.3) appears overly ambitious, and unlikely to provide a clear steer as to which equipment is most needed to address key risks and gaps.

All in all, therefore, the envisaged data-driven approach to identifying needs and allocating funding could only be applied to a very limited extent under the first call. As a result, it is clear that, by and large, the first wave of projects responded primarily to national needs and priorities as identified by applicants (i.e. Member States) themselves, with very little steer or corrective

action at EU level to ensure they addressed the most pressing needs of the Customs Union as a whole.

In the second call, the situation changed somewhat. Based on the data provided by Member States as part of their applications for and reporting on projects under the first call (as well as data from selected other sources), DG TAXUD provided country-specific recommendations to each national customs administration regarding which types of equipment and risks they should prioritise under the second call. Draft recommendations were first sent in November 2023, and subsequently discussed in bilateral meetings, before a final version was sent to Member States as a complement to the call documentation in December 2023. Under this call, the Relevance criterion made explicit reference to the individual recommendations, and applicants were asked to justify the needs based on these. In addition, the minimum passing score for Relevance was increased by one point (from 5 to 6 out of 10) to try to emphasise the importance of this criterion. All applicants addressed the individual recommendations, some in a major, others in more minor ways. During interviews, several national customs administrations referred to and welcomed the recommendations, describing them as helpful and relevant.

As such, the recommendations provided an important use case for the data collected from Member States, and, along with the more specific priorities, are likely to have had at least a modest effect in terms of making applications under the second call more responsive to key needs at the level of the Customs Union as a whole. Nonetheless, competition for funding was again limited, meaning the lion's share of applications could be funded, and only a limited level of selection and prioritisation was needed. As noted previously, no applications were rejected entirely, although some had their scope reduced with the exclusion of certain work packages.

Overall, this has meant that the extent to which the allocation of the funds has been effectively informed by a rigorous assessment of needs has been limited under the first and, to a slightly lesser degree, second call. There is no doubt that the equipment that has been supported by the CCEI to date is both eligible for co-financing under the applicable rules, and relevant to address the overarching objectives. However, it responds more to needs as identified by individual Member States. Therefore, the CCEI as implemented to date may not always ensure that the most significant gaps and needs at EU level are addressed as effectively and efficiently as possible.

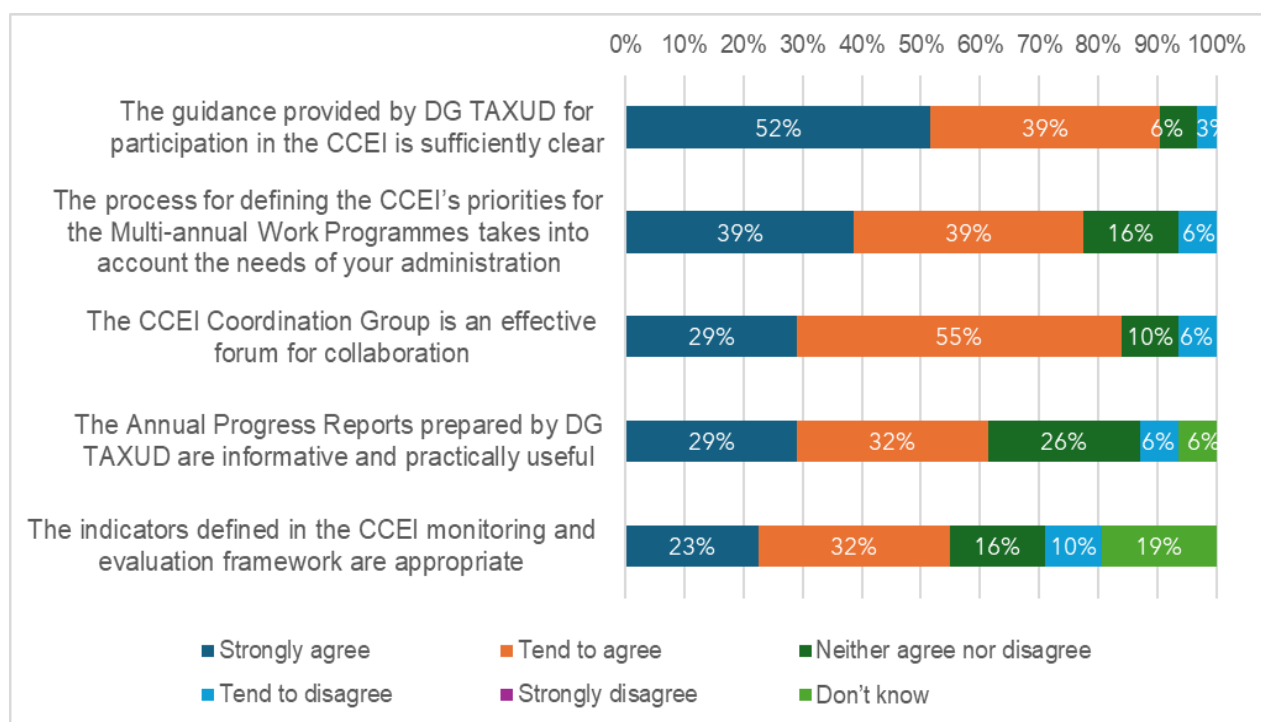
Implementation mostly efficient, but issues with the data model

Overall, feedback from the national customs administrations (i.e. CCEI beneficiaries) suggests that the support provided by the Commission to Member States in the implementation of the CCEI has been highly appreciated. Their satisfaction with the guidance, programme management, and timeliness of support provided by the CCEI is gauged annually via a survey launched by DG TAXUD in the context of the MEF, which shows that satisfaction levels have been consistently high – with nearly 100% of respondents either satisfied or fully satisfied with all aspects (namely, the quality of (1) the guidance provided at the application stage, (2) the information contained in the call documentation, and (3) the ongoing guidance provided during implementation).

In a similar vein, over 90% of respondents to the questionnaire agreed (many of them “strongly”) that the guidance provided by DG TAXUD to participate in the CCEI was sufficiently clear. Feedback gathered during interviews confirms that the guidance, communication and ad-hoc

support provided by the Commission were particularly well appreciated. Moreover, several interviewed customs authorities stated that plenty of notice was given to customs authorities to ensure they were ready to respond to CCEI calls in time. A clear majority of respondents also found the CCEI Coordination Group to be an effective forum for collaboration, and believed the process for defining priorities for the MAWPs took into account their needs. On the other hand, there were only tepid levels of appreciation for the Annual Progress Reports and the indicators defined in the MEF.

Figure 7: Please consider your level of agreement with the following statements of the management structure and processes of the CCEI



Source: Questionnaire responses from national customs administrations

Feedback was also generally positive on the grant application and award processes. Applicants and beneficiaries had no significant complaints about these procedures, except as regards the burden linked to the preparation of CCEI applications, which was perceived as very heavy by several interviewees.

This criticism was linked primarily to the data model, and more specifically, to the quantitative data applicants had to provide (via the “detailed budget sheets” that accompany the application form). This data includes a comprehensive inventory of the Member State’s customs control equipment (broken down by BCPs and Labs), as well as traffic statistics per BCP and Labs, and a series of performance indicators meant to help identify and rank risks. In accordance with the data-driven approach enshrined in the CCEI Regulation, the purpose of this data is to identify gaps and needs, so that CCEI funding can be targeted at these, as well as facilitate monitoring and evaluation of the Instrument (via the MEF indicators). To enable this, national customs administrations are expected to submit data at the grant application stage, as well as, in updated form, via their annual progress and final reports on each grant.

However, the questionnaire responses, interviews and case studies showed that most national customs administrations found it difficult and burdensome to provide this data with the requested levels of detail and granularity. Interview feedback suggests that the data collection and reporting process often required significant manual effort, as the data typically had to be compiled from various sources, and the categories were not always aligned with national procedures and frameworks, and in some cases, not available at all. Certain metrics (in particular those related to the identification and ranking of risks) were also deemed to be insufficiently clearly defined and thus open to interpretation.

Moreover, several Member States expressed doubts about the actual relevance and usefulness of the data. While they typically understood the need for CCEI support to be informed and driven by a good understanding of the actual needs and risks, and were supportive in principle of the Commission's endeavour to collect data to facilitate this, many expressed doubts about the extent to which the data sheets in their current form were conducive to achieving this. The majority (52%) of questionnaire respondents tended to agree that the information DG TAXUD collects as part of the CCEI grant application process (via the various detailed budget sheets) was relevant for identifying the needs of their customs administration, but only a small proportion (19%) agreed strongly, while a similar proportion disagreed (19%) or responded neutrally (10%).

As a result of the above-mentioned issues, the data collected by DG TAXUD was not complete, and there were issues with its quality, reliability and comparability across Member States and categories. This was the fundamental hurdle by far to successfully implementing and leveraging the data model as envisaged. The fact that the data on which needs assessments are to be based is to some extent fraught is one of the main reasons why it is difficult to ascertain to what extent CCEI funding to date has been effectively and efficiently focused on the most significant needs and risks.

To assess the costs of the CCEI, the evaluation sought to explore not only the direct costs for the EU budget – approx. EUR 550 million in grant funding approved to date – but also the administrative burden incurred by the Member States. To estimate this, as part of the questionnaire, national customs administrations were asked to provide information about the amount of staff time they dedicated to participation in the CCEI. Although not all Member States were able to provide such data, and the responses of those that did varied significantly, they nonetheless allow for at least an indicative estimation of the burden the various procedures and tasks impose on participating entities. National customs administrations reported they expended slightly less than 120 days of their staff's time to take part in the CCEI and manage their country's projects (per year so far on average). By applying a set of assumptions in accordance with the EU's Standard Cost Model, this can be translated into an annual administrative burden of approximately EUR 22,500 per Member State (including overheads), or a little over EUR 600,000 for all national customs administrations taken together. This is equivalent to less than 0.5% of the annual CCEI budget.

Among the different CCEI-related tasks that national customs administrations have to carry out, the one they indicated as using up the most resources was managing an active CCEI grant, followed, in second place, by compiling a CCEI grant application (incl. the data required for the data model). As part of the questionnaire, respondents were also asked to indicate whether or not they considered the total CCEI-related workload, and that stemming from each of the tasks, to be acceptable. The majority responded that this was the case for nearly all tasks, with only a small minority (10%) describing the amount of time needed as not acceptable. However, 23% of

respondents reported not finding the amount of time at application stage to be acceptable. This further confirms the feedback from customs administrations that the data requirements were excessive and burdensome.

In view of this – i.e. it is difficult and burdensome for Member States to provide the data, and even so, what they are able to provide is not sufficiently reliable, consistent and comprehensive for DG TAXUD to use as intended – there is likely to be significant simplification potential regarding the data model. This is not to say that data should no longer be collected. However, there may well be potential to streamline the framework and focus it on the elements for which, with a little extra effort, reliable and comparable data can be collected, and subsequently used to identify real needs and monitor progress. As part of this, it should be considered whether some indicators that are currently collected via the data sheets 4 and 5 could be removed or reduced in terms of their scope or granularity. For the indicators that remain, it should be revisited whether they are defined in a clear and unambiguous way, and where needed, additional clarifications, simplification and guidance provided to ensure their consistent interpretation and application.

Coherence high, both internally and externally, but potential for synergies not fully exploited

The CCEI's design is internally coherent, in the sense that its various elements (of which there are few – essentially, a single kind of main activity, namely the provision of support for the purchase, maintenance and upgrade of customs control equipment via grants to projects implemented by the national customs administrations of EU Member States, and a series of supporting activities implemented by DG TAXUD to steer, coordinate and manage the instrument, and to provide technical and administrative assistance to applicants and beneficiaries) all operate well together to achieve its objectives. Where aspects of the CCEI's design (e.g. the shares of the call budgets earmarked for BCPs and Labs, respectively) turned out to be not fully aligned with actual needs, the CCEI Regulation provided sufficient room for manoeuvre for the Commission to respond flexibly.

Nonetheless, to date CCEI-supported national projects have operated almost entirely in isolation from each other, and there may be scope to try to foster synergies between them, by exploring ways in which aspects like standardisation, data sharing, or learning from each other's experiences could be built into projects and/or addressed via supporting activities. During interviews, several representatives of national customs administrations expressed a desire for more informal knowledge-sharing platforms, such as workshops and peer-to-peer sessions, to facilitate best practice exchanges and enhance collaboration among Member States, with a view to improving customs practices and fostering innovation. Some also lamented that, to date, the CCEI has not made any attempts to facilitate joint procurement, noting that this holds significant potential to generate economic benefits, although key barriers (in particular differing national legislation) are likely to continue to be difficult to overcome.

Externally, the CCEI is designed in a way that seeks to maximise its coherence with other relevant EU programmes and funds. In this context, collaboration with the Customs programme¹⁴, the Border Management and Visa Instrument¹⁵ and close links, including through a

¹⁴ The Customs Programme supports actions (among others) that can complement the CCEI, such as exchange of good practices, lessons learnt or training relating to the equipment concerned.

structured coordination mechanism, with the Union Anti-Fraud Programme, the Horizon Europe Programme, and the Technical Support Instrument (TSI) can be mentioned. The MAWP 2023-2024 states specifically that the CCEI seeks to create synergies with all of these, as well as with the Internal Security Fund (ISF) and the Recovery and Resilience Facility (RRF), and that complementarities with these programmes are encouraged.

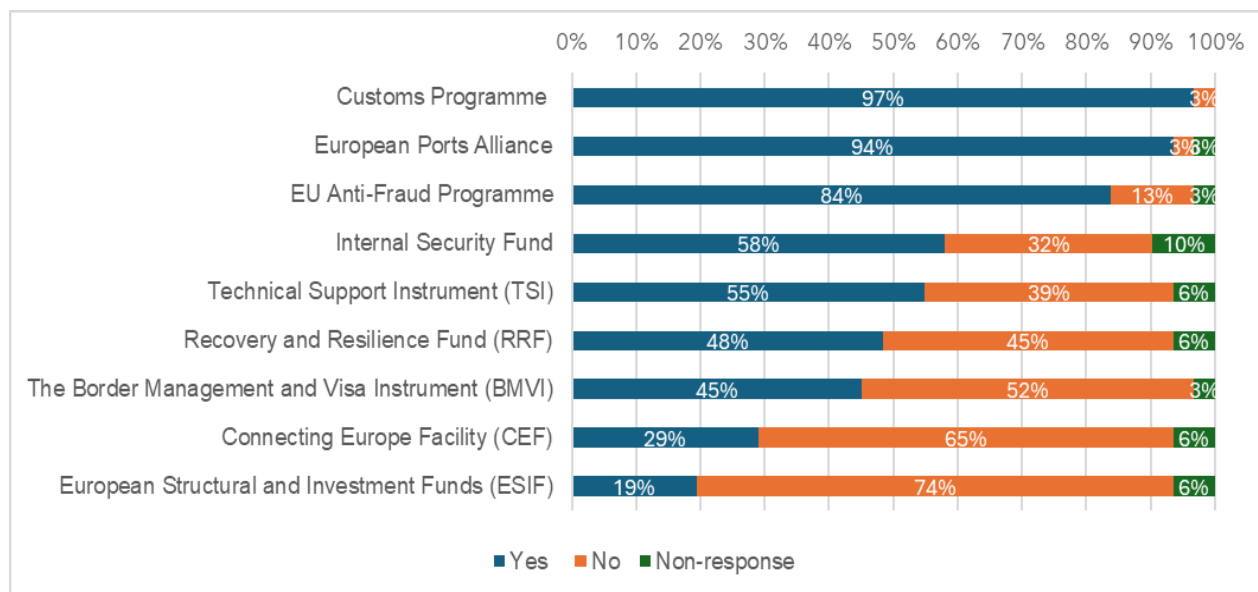
Specifically, the CCEI and the EU Anti-Fraud Programme overseen by OLAF demonstrate clear complementarity, effectively addressing distinct yet interconnected objectives. Before the establishment of the CCEI as a standalone instrument, OLAF's programme (Hercule) was instrumental in supporting beneficiaries seeking funding for border equipment. Since the CCEI's inception, the Anti-Fraud programme has reallocated its resources to support other beneficiaries (e.g. other law enforcement agencies) and different types of tools and technologies.

Overall, while the CCEI's external coherence with other relevant sources of EU funding is high in theory, the extent to which this has led to actual synergies and complementarities varies somewhat. This is partly due to the different levels of awareness. Based on the questionnaire responses (see below figure), almost all of the officials dealing with the CCEI in national customs administrations are familiar with the Customs programme, but awareness levels are much lower for some of the other initiatives. Consistently with this, most examples of synergies highlighted by questionnaire respondents and interviewees related to aspects of the Customs programme, such as trainings, meetings, and expertise sharing actions and fora like the Customs Laboratories Expert Team (CLET), the Customs Laboratories European Network (CLEN), and the Customs Eastern and South-Eastern Land Border Expert Team (CELBET). But there is limited evidence of meaningful synergies or concrete complementarities with the other initiatives listed, which may be partly due to the fact that a number of respondents pointed out that they would not be aware of synergies or overlaps because these initiatives are generally handled by other officials within their national authorities.

Only a handful of examples of a complementary use of the CCEI and other EU instruments could be identified. A few Member States indicated having used the Anti-Fraud Programme and receiving funding for elements that are not covered by the CCEI but complement the equipment procured under the CCEI (e.g. videorecorder, IT-equipment, or vehicles). One Member State was reportedly considering using the RRF to help fund infrastructure necessary to install and operate equipment purchased through the CCEI. The overall efficacy of synergies with the BMVI is still developing. Regarding the extent to which customs control equipment is shared with other border authorities, the responses highlight that many Member States have not yet shared equipment financed under the CCEI with other border authorities. This is often due to the specific nature of the equipment, which is tailored for customs use and requires trained personnel for operation.

¹⁵ The Border Management and Visa Instrument (BMVI) with the CCEI forms part of the IBMF, but focuses primarily on control of persons crossing the EU external borders, thus complementing the CCEI's focus on goods.

Figure 8: The CCEI aims to complement a number of other sources of EU funding, several of which are listed below. Can you indicate whether you / colleagues working with the CCEI are aware of these initiatives?



Source: Questionnaire responses from national customs administrations.

4.2 How did the EU intervention make a difference and to whom?

While still ultimately concerned with the success of the CCEI, this question looks at success through the lens of **EU added value**. More specifically, it seeks to understand whether the instrument made a difference for the intended target audience of national customs authorities, above and beyond what could have been expected with national interventions and funding alone. This is in line with the principle of subsidiarity, which dictates that EU action should be limited to areas where it is truly needed. It also follows the logic of deploying finite EU resources in the most efficient manner, since, other things being equal, these should be devoted to interventions where other actors are either unable to step in, or where EU involvement catalyses positive impacts that could not have been achieved otherwise.

The answer to this question is based on assessment of the CCEI from several angles. First and perhaps most important is the assessment of ‘additionality’ of CCEI funding, which means the extent to which it led to purchases of customs control equipment that was not only needed, but would not have been possible through other means. It then considers whether and how the CCEI generated cost savings and/or economies of scale, e.g., by pooling expertise or increasing standardisation in a way that reduced costs charged by suppliers. Another angle – absolutely fundamental given the EU’s common external border and absence of internal borders – relates to the CCEI’s ability to contribute to the mission of EU customs to act as one. Further to this, it is also important to consider whether and how the CCEI has enabled the Member States to address mutual challenges. Finally, the assessment looks at how the CCEI could be further harnessed to

support the proposed EU Customs Reform¹⁶, which foresees a step change in terms of harmonising, coordinating and – to a certain extent – centralising customs practices.

CCEI funding mostly additional, but in some cases it merely replaced national funding

For the over EUR 550 million of CCEI funding used and committed so far to be truly ‘additional’, it needs to be directed towards purchases that would not have been possible from national budgets or other sources. In the first instance, a key underlying condition for additionality seems to have been present. Stakeholders engaged for the evaluation frequently raised the issue of imbalances between Member States in the financial resources available for customs control equipment. For example, nearly 80% of customs authorities responding to the questionnaire cited this as a ‘very’ (48%) or ‘quite’ important issue. This concern was echoed in the open replies, with several Member States identifying financial imbalances as a critical problem, since ‘the Customs Union is only as strong as its weakest link’. Many interviewees from customs authorities, European institutions and international organisations expressed a similar view. The implication is that many customs authorities would not have been able to mobilise the resources needed for adequate customs control equipment without outside funding.

However, it does not follow automatically that only Member States in need of the funding would take part in the instrument. The levels of additionality would be expected to differ depending on the circumstances and needs of individual customs authorities. The data collected in this evaluation indicates that the Member States fall broadly into two groups. The first group is comprised of countries for which CCEI funding clearly enabled purchases of customs control equipment that would not have been possible from other sources. The questionnaire results suggest that most Member States fit this description. Almost two thirds (61%) of respondents reported that, without the CCEI, their customs authorities would not have been able to purchase equipment requested in their grant applications. Only 9% were of the opposing view, while the remaining 30% were either neutral or didn’t respond.

Of the in-depth case studies conducted on ten grants for the first CCEI call, levels of additionality were found to be high for six of these. In these cases, a unifying theme was of significant equipment needs combined with lacking resources at national level. All but one of the case study grants in this category possess important land borders with third countries, while the other is the site of one of the EU’s largest container ports. Four of the grants were also among the largest from the first call in terms of monetary value. Customs authorities in all six of the countries emphasised urgent needs, e.g., due to continued reliance on equipment that was obsolete and/or had exceeded its expected lifecycle. It is also telling that these six grants were all subject to delays. While negative from an implementation perspective, this seems correlated with high levels of additionality, because Member States that dared to go outside their comfort zones with ambitious funding requests frequently experienced difficulties to put these plans into action. Still, despite timescales that were longer than expected, the case studies provide compelling evidence that these grants will ultimately lead to the purchase and deployment of equipment that would not have materialised otherwise.

¹⁶ Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee, Customs reform: Taking the Customs Union to the next level, COM(2023) 257 final, Brussels, 17.5.2023; see also the Commission’s dedicated website, which provides an overview of the planned reform as well as its impact assessment and other documentation.

In contrast, the other four of the case studies covered equipment needs that national officials admitted would have been met regardless of the CCEI. The specific circumstances differed to a degree; for example, in some cases the CCEI funding was simply used to help implement equipment modernisation plans that had already been approved and launched. In other cases, the availability of EU funding allowed customs authorities to speed up / bring forward equipment purchases that might have been spread out over a few years. Given the importance of maintaining a high level of control at all times, the role of the CCEI in allowing these Member States to deploy needed equipment more quickly is also a form of additionality that should not be underestimated. In this respect, it is worth pointing out that only one of the four grants in this group was delayed.

Of course, the picture is not fully black and white. For example, customs authorities from several Member States explained that, even if they would have been able to purchase the requested equipment without EU co-funding, the CCEI served to elevate customs control equipment on the political agenda, incentivising customs to strive for more ambition and ‘protecting’ against budget cuts.

Some costs savings generated, but major economies of scale still largely unrealised

In principle, the CCEI could also make a difference by saving money for the Member States. Several pathways to these savings could be foreseen. At a basic level, the CCEI Coordination Group aims to serve as a forum for pooling knowledge on customs control equipment and on procurement, which could help the Member States to develop tender specifications and run procurement processes more efficiently. Increased standardisation, if achieved, could also reduce the costs charged by suppliers, while joint procurement would aim, inter alia, to give purchasers more bargaining power and drive down costs.

In practice, the first of these pathways seems to have materialised to some extent. Asked in the questionnaire about whether the CCEI Coordination Group is an effective forum for collaboration, the vast majority either ‘strongly agreed’ (29%) or ‘tended to agree’ (55%). In the interviews, several customs authorities further explained that the expertise, advice and templates / sample material shared in the Coordination Group served to reduce costs at national level for the drafting of tender specifications, management of procurement processes, and dealing with suppliers. This was especially appreciated by smaller Member States, which lack in-house capacity. Aside from saving staff time, this also reduced the chances of unsuccessful procurements and litigation. In addition, the more targeted approach of the second call for proposals, which included specific recommendations to Member States and increased guidance in areas like security specifications, was seen as a further step forward. However, customs authorities would have hoped for even more opportunities through the CCEI for informal exchange and knowledge-sharing, which they did not feel had been fully exploited to date. Moreover, the scale of these types of savings has been limited because they have not affected in any fundamental ways the processes for procuring and deploying customs control equipment, where most costs are incurred.

Turning to the savings that could potentially result from either standardisation of equipment or joint procurement, these remain largely unrealised. Regarding standardisation, although a majority of questionnaire respondents (55%) agree that this is occurring to some extent through the CCEI, this was not considered an area of major progress, and no interviewees felt that it was helping to obtain lower prices. For its part, joint procurement is permitted in the CCEI

Regulation and many officials responding to the questionnaire and taking part in interviews mooted its future promise, especially for less tailored types of equipment like handheld scanners. The potential benefits from central purchasing by the Commission, if facilitated by the proposed EU Customs Reform, also attract considerable enthusiasm. However, these benefits remain theoretical in the absence of any concrete attempts to actively promote or enable joint procurement at this stage.

Incremental steps achieved towards the EU Customs mission of acting as one

In light of the EU's common external border, a key part of the mission of EU customs is for the 27 customs authorities to increasingly act as if they were one. The CCEI specific objective envisages progress towards this mission through enabling purchases of customs control equipment, which in turn aim to reduce disparities between Member States and contribute to achieving a uniform level of control.

The CCEI has been progressing towards its objectives relatively effectively, albeit slowly, due mainly to problems and delays experienced with national procurement processes. Still, this was attributed to external factors rather than design flaws in the CCEI. Encouraging early results were noted, alongside beneficiaries' confidence that the CCEI will make a significant contribution over time to its objective of achieving adequate and equivalent results of customs controls. This is a positive finding, though most practical, operational impacts are still yet to emerge.

In theory, the CCEI could also foster other opportunities for customs authorities to act as one, such as through increasing cooperation between customs authorities, standardisation of customs control equipment, and sharing of data and actual equipment. Some effect can be observed on the first of these. As mentioned above the CCEI Coordination Group has become a key forum for exchange on matters concerning customs control equipment (with other groupings such as CELBET¹⁷ and CLEN¹⁸ also playing important roles in this respect), even if some participants saw room to take further advantage of this (e.g., by organising more workshops and peer-to-peer sessions). However, when it comes to operational collaboration stemming from the CCEI, examples of impact are extremely limited. Just 26% of questionnaire respondents agreed that the CCEI had led to more data-sharing, of which only 10% 'strongly'. Despite the role of EU co-funding and a general enthusiasm to work more together, the bottom line is that decisions on the equipment to be purchased and its use are made primarily within national silos. This is in line with the implementation modality of the CCEI, which relies on the Member States to procure the equipment, and with policy on customs controls more broadly, whereby individual customs authorities are in charge of risk analysis and controls.

In this regard, interviewed officials expressed little awareness for how data or the equipment itself (where physically feasible, such as for mobile equipment between neighbouring countries) could be shared or the legal and practical protocols for doing so. Cybersecurity concerns and

¹⁷ The Customs Eastern and Southern Land Border Expert Team working under the Customs programme and bringing together experts from 11 Member States, see dedicated website: [CELBET - Customs Eastern and South-Eastern Land Border Expert Team](#).

¹⁸ The Customs Laboratories European Network, which was established in 1999 and aims to rationalise, coordinate and optimise the use of human and technical resources among customs laboratories in the EU.

closed IT environments were also mentioned as obstacles, as was (by fewer customs administrations) the ineligibility for CCEI funding of IT infrastructure, which in principle could be used to build and maintain connections for sharing and jointly interpreting data between countries. Stakeholders were of the view that achieving more structural impacts would depend on the increased harmonisation and centralisation of EU customs practice foreseen in the proposed EU Customs Reform.

Progress towards addressing mutual challenges hampered by lack of targeting and procurement difficulties

The CCEI has been making progress towards its specific objective, the pace of which is expected to increase over time as more and more equipment is purchased and deployed. Since the challenges faced by individual Member States are by definition also challenges facing the Customs Union, the CCEI can be said to be making a difference in this regard. However, it should also be emphasised that the CCEI's relatively bottom-up, open approach has given the Member States significant discretion to decide on which equipment priorities to pursue. This was particularly true of the first call for proposals, which focused on countries' short-term priorities. The second call targeted specific policy priorities, while the Member States also had to take into account individual recommendations from DG TAXUD in their grant applications. Still, both calls were open to all Member States (vast majorities of which chose to participate in each case) rather than, say, priority countries or BCPs. Moreover, even for the second call, the priorities were sufficiently broad such that most – if not all – types of eligible equipment could reasonably be justified. In contrast, the CCEI expressly did not dictate in a top-down manner which equipment should be purchased and where it should be deployed.

It is difficult to determine the appropriate amount of steering and prescriptiveness. On the one hand, a more centralised, top-down approach – with decisions about the equipment to be purchased and locations for deployment taken at EU-level – could in principle result in a more efficient allocation of resources and better address the challenges facing the Union as a whole. On the other hand, the national competence for customs controls limits the amount of steering that would be politically and legally feasible, and providing all Member States with the opportunity to take part helps ensure wide support for the instrument. The decision to purchase equipment is a complex one where many factors need to be taken into account – including existing infrastructure, available space, geographical location, adequate levels of staff with narrow expertise, budgetary restrictions, traffic patterns, etc. All these factors cannot easily be factored into a data model; some can arguably only be adequately assessed from a Member State perspective (or by on-site inspections from the Commission, which would allow it to assess the BCP/customs laboratory in its entirety). And since the CCEI database still lacks comprehensive and accurate data on existing equipment deployments and needs, it would also be difficult to centralise decision-making beyond a certain degree. A balance probably needs to be struck, and the second call looks like a step in the right direction, even if somewhat more direction from the Commission (e.g., by focusing calls on a narrower set of obligatory priorities) would probably be desirable.

Significant potential for the CCEI when the proposed EU Customs Reform is implemented

Finally, in assessing whether and how the CCEI has made a difference, it is worth considering the programme's potential in light of a policy and institutional framework that is not static, but rather is likely to evolve significantly in the coming years. Specifically, this is likely to be

profoundly transformed by the proposed EU Customs Reform¹⁹, an ambitious initiative that aims to further harmonise customs practice in the EU and make it more risk-based and data-driven. While key provisions of the reform are not scheduled to apply until 2028, it is useful to reflect on ways in which the CCEI could potentially add more value once the envisaged changes are in place, in particular with regard to certain shortcomings and areas of limited progress. These include a lack of targeting, insufficient procurement guidance and limited use of the instrument to foster standardisation, innovation, data sharing and operational collaboration, as well as slow progress towards joint procurement, which has not yet been attempted or piloted with the programme.

Of the wide range of legal and procedural novelties envisaged in the EU Customs Reform, feedback from stakeholders suggests that three of these in particular have strong links to the CCEI's existing problems. These are briefly described below, in terms of the role of the current framework in causing and contributing to the problems, and the potential that the proposed reform creates for addressing these:

- Harmonisation of customs risk management: under the current Union Customs Code, risk management and controls are largely the responsibility of national customs authorities, especially for non-financial risks, based on the national risk frameworks and risk engines used to target controls. The Customs Reform will change this by introducing provisions by which all Member States will have access to real-time data and will be able to pool information to respond more quickly, consistently and effectively to risks and introducing a new strengthened risk management framework, which will be based on a common prioritisation of risks for the whole EU, a mechanism for increased operational cooperation.
 - In practice, more consistency will be needed in the arena of customs control equipment, regarding increased standardisation, the sharing and/or pooling of data, and interoperability and coordination between customs authorities conducting controls. To facilitate this, the CCEI could require authorities applying for grants to purchase interoperable equipment based on common standards, and to put in place protocols for sharing the images and other relevant data produced using the equipment, and for interpreting those images (potentially assisted by AI). Such requirements could also act as an additional incentive for Member States to take steps towards joint requirements.
- Establishment of an EU Customs Data Hub: the impact assessment for the Customs Reform determined that traders currently need to submit customs data to up to 111 different IT systems and to deal with the authorities in all Member States where they have operations. While interoperability between certain systems allows some of the data involved to be shared, this is seldom the case for the risk data used to target controls and images and other information produced using customs control equipment. Cybersecurity

¹⁹ Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee, *Customs reform: Taking the Customs Union to the next level*, COM(2023) 257 final, Brussels, 17.5.2023; see also the Commission's dedicated website, which provides an overview of the planned reform as well as its impact assessment and other documentation: [EU Customs Reform - European Commission](#).

concerns and national rules and processes pose additional barriers. The introduction of an EU Customs Data hub will act as an enabler for the harmonised risk management described above, as well as making it easier for customs authorities to share information securely and thereby coordinate and mutually benefit from each other's controls.

- The Data Hub should increase the potential added value of more uniform approaches to customs control equipment, which would in turn also make it more worthwhile for the CCEI to prioritise the purchase of standardised and interoperable equipment. Increased possibilities for the pooling and sharing by means of the data hub and coordinated use of data could also spur innovation through the future CCEI type interventions.
- Establishment of an EU Customs Authority: despite the nature of customs policy as an exclusive EU competence, and the increased harmonisation of rules and processes, for the most part national customs authorities have retained responsibility for implementation. The EU Customs Authority will change this by, for the first time, assigning certain customs operational tasks to a central body. Concretely, these tasks will include using the data from the EU Customs Data Hub to conduct EU-level risk analysis and make control recommendations to national authorities, and coordinating operations in the event of a crisis. Potentially, it will also take responsibility for developing and maintaining the EU Customs Data Hub and executing customs related programmes.
 - The EU Customs Authority is likely to open the door to a myriad of possibilities for the CCEI. As a centre of expertise on a number of relevant matters (such as technological developments and capabilities, cybersecurity and procurement practices), the authority can ensure the use of such knowledge to inform CCEI planning, and development of requirements, guidance, templates etc. Inter alia, this could include taking action to introduce standardised testing protocols, enabling more effective comparisons of equipment.²⁰ Operational staff would be able to play a coordinating role vis-à-vis national customs authorities, increasing the chance that opportunities for sharing data and collaboration are grasped. It would also be the central location for enabling the use of shared images, and for producing a reference library for both training and interpretation purposes, which would in turn help refine algorithms for risk analysis purposes. And finally, were the decision taken to further streamline the procurement of customs control equipment for the proposed targeted CCEI type interventions, joint procurement or even carrying out purchases centrally, with the EU Customs Authority in lead for these initiatives, could be the way forward.

4.3 Is the intervention still relevant?

This section assesses the **relevance** of the CCEI by examining its alignment with evolving EU needs and priorities, its ability to adapt to geopolitical and technological changes, and the extent

²⁰ This would be in line with the first recommendation of a recent study carried out for DG TAXUD on customs detection technologies: European Commission (2024), *Customs control detection technologies: state-of-the-art, emerging customs control equipment and its testing*, study prepared for the European Commission by NTT Data.

to which it meets the needs of stakeholders. The evaluation considers the objectives, scope, and design of the instrument in relation to its intended role in strengthening the level of customs control across the EU.

The CCEI was established to address critical disparities in customs control capacities across Member States by co-financing the procurement, maintenance, and upgrading of customs control equipment. Given the dynamic nature of customs challenges – ranging from security threats to digitalisation and organised crime – the instrument’s continued relevance depends on its capacity to remain aligned with EU policy priorities, support Member States in acquiring necessary equipment, and foster a modern and harmonised approach to customs enforcement.

CCEI well-aligned with EU customs priorities

The EU Customs Strategy²¹ and Customs Action Plan²² provide the overarching framework for strengthening the Customs Union, setting out key priorities such as modernising customs enforcement, enhancing risk management and data sharing, and improving cooperation between Member States. These strategic documents emphasise creating a more data-driven and resilient customs system, reinforcing risk-based control mechanisms, and equipping customs authorities with the necessary infrastructure and technologies to improve enforcement capabilities. They also outline concrete initiatives such as expanding data availability, streamlining e-commerce-related customs procedures, and promoting compliance through simplified reporting tools. While the EU Customs Reform is not implemented, the Customs Strategy and the Action Plan remain two centrepieces to shaping EU customs policy.

The CCEI aligns closely with these objectives by providing financial support for customs control equipment across all 27 Member States, and thereby aiming to ensure a more harmonised enforcement capacity across the Customs Union. By offering broad funding eligibility for essential detection and inspection technologies, the CCEI is designed to enable customs authorities to modernise and reduce disparities at external borders. The instrument’s financial scope allows for substantial investments in high-end equipment that might otherwise be beyond the reach of national budgets. By ensuring that all Member States can enhance their enforcement capabilities, the CCEI seeks to contribute to the strategic goal of ensuring the Customs Union acts as one and increasing control capabilities at external borders, which are objectives also at the heart of the Customs Strategy.

The CCEI MAWPs have played a key role in maintaining the programme’s relevance by adapting its scope to emerging priorities. The first MAWP (2021-22) focused primarily on improving the general level of equipment across the EU and limiting the risks of the weakest links at the external border. It did so by prioritising equipment shortages and improving customs controls at the Union level, with a focus on urgent and short-term needs. As new challenges emerged, the second MAWP (2023-24) sharpened the programme’s focus to include:

- Supporting sanctions enforcement following Russia’s invasion of Ukraine;

²¹ Available at the Commission website: https://taxation-customs.ec.europa.eu/customs-4/eu-customs-strategy_en

²² Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee, *Taking the Customs Union to the Next Level: A Plan for Action*, COM(2020) 581 final, Brussels, 28.9.2020.

- Enhancing detection capacities to counter illicit trade and organised crime, in line with the EU Roadmap to Fight Drug Trafficking and Organised Crime²³ including a European Ports Alliance;
- Addressing challenges in e-commerce customs controls;
- Promoting innovation and interoperability in customs technology, taking into consideration the proposal for an EU Customs Reform.

This adaptability has helped ensure that the CCEI remains relevant in addressing both existing and evolving customs challenges.

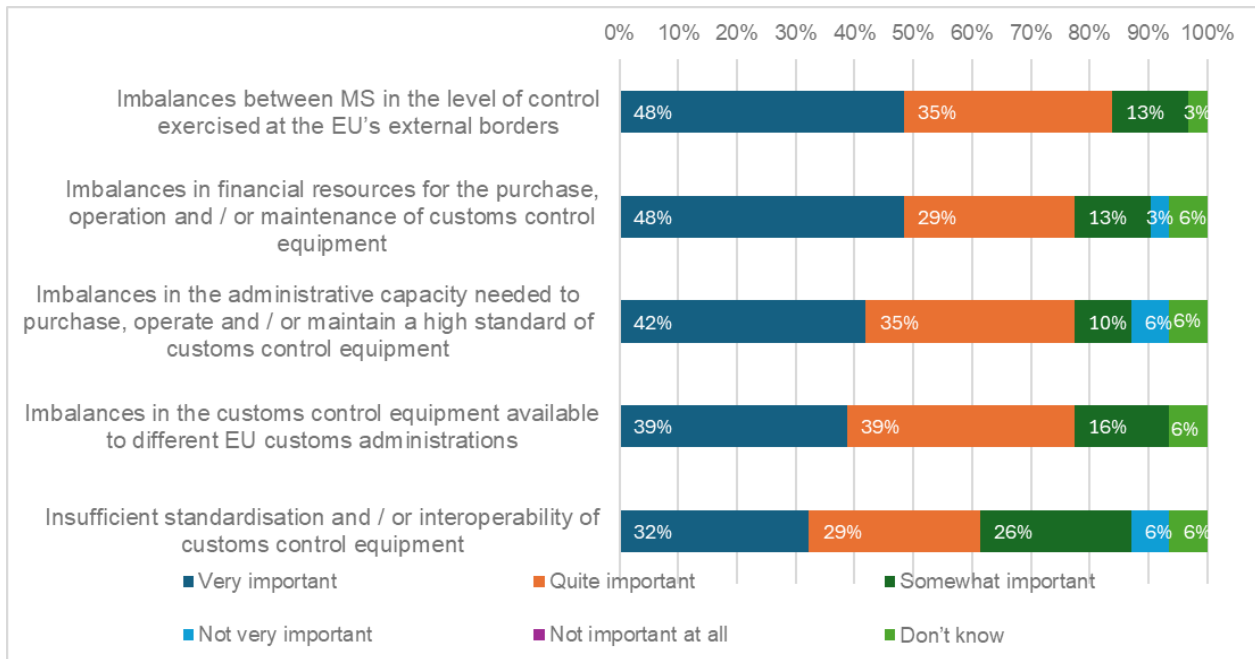
Relevance to Member States remains high, with some reservations

The CCEI enjoys strong support among customs authorities, with all 27 Member States having sought – and secured – funding in at least one of the two calls. The instrument is widely regarded as an essential tool for reducing disparities in customs enforcement capabilities, ensuring that all Member States, regardless of national budgetary constraints, can access state-of-the-art customs control equipment.

The overwhelming majority of customs administrations agree that the needs the CCEI aims to address are genuine and that the underlying issues have been identified correctly. The results from the questionnaire analysis show a strong consensus among customs authorities on the need to reduce imbalances in customs control capabilities, with 48% considering it very important and 35% somewhat important. The most pressing concerns identified were financial disparities (48%), administrative capacity (42%), and equipment availability (39%). Several Member States stressed that the Customs Union is only as strong as its weakest link, reinforcing the need for an EU funding instrument and EU-level coordination on matters of customs control equipment. Many respondents saw the CCEI as essential for raising levels of enforcement to a high and uniform level, a view echoed in interviews, where customs authorities highlighted its role in strengthening security at key BCPs.

²³ Communication from the Commission to the European Parliament and the Council on the EU roadmap to fight drug trafficking and organised crime, COM(2023) 641 final, 18.10.2023.

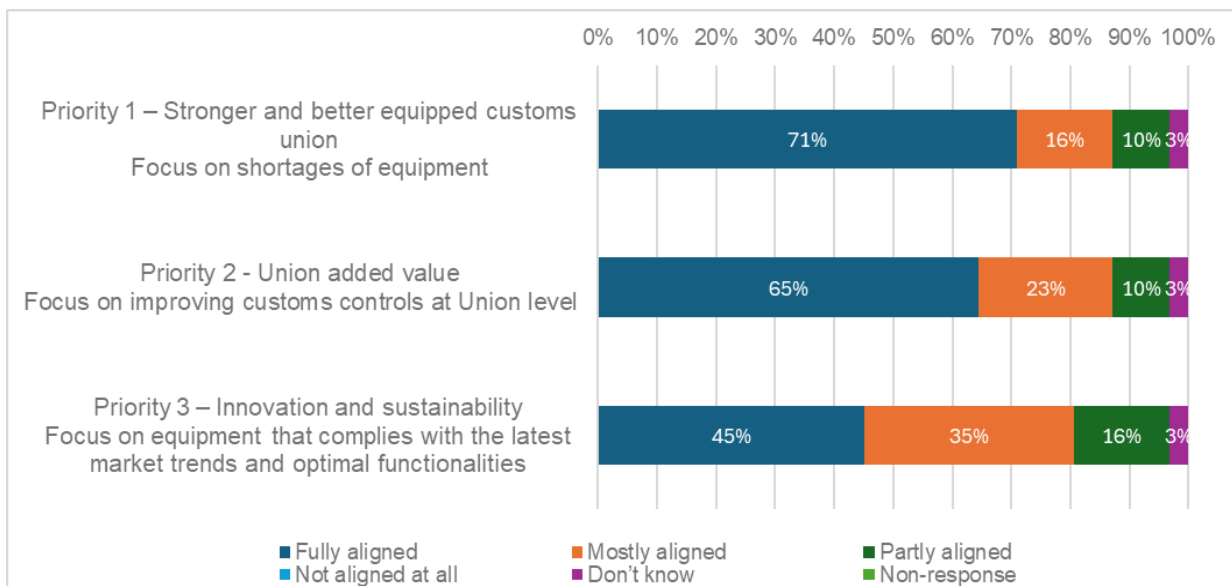
Figure 9: How important are the following issues and challenges from the perspective of your customs administration?



Source: Questionnaire responses from national customs administrations

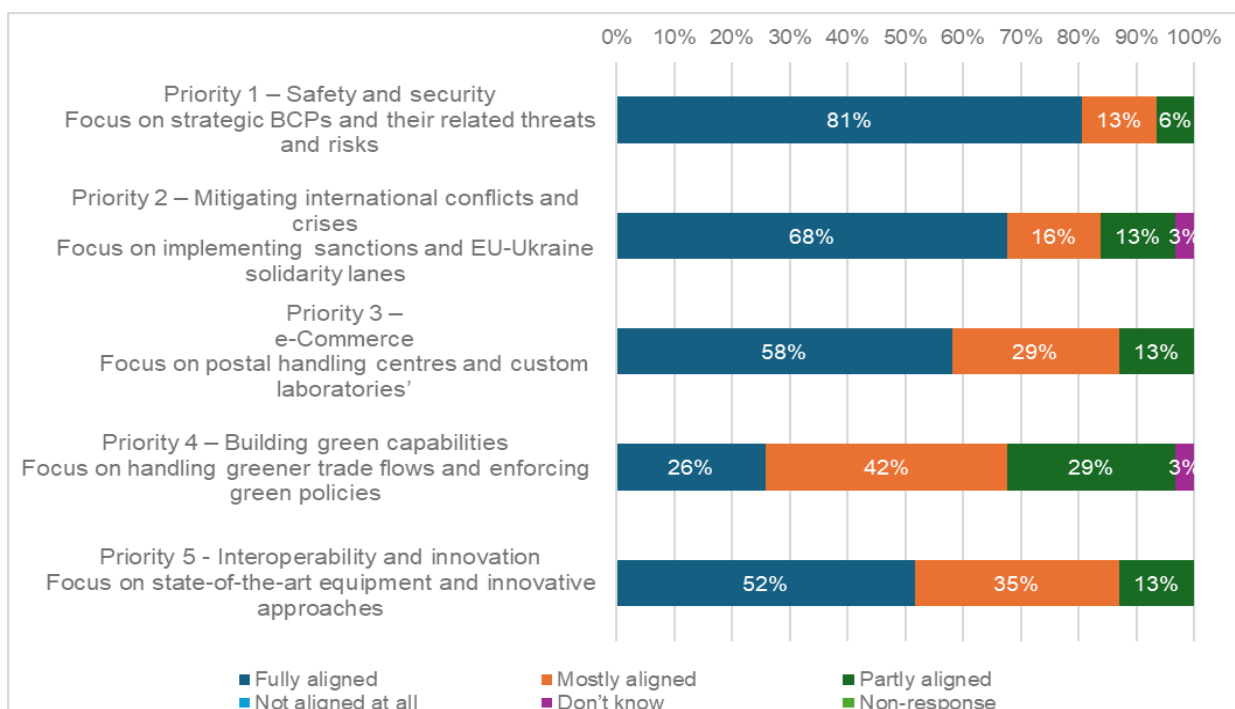
With regard to the objectives defined for the CCEI under the first two MAWPs (2021-22 and 2023-24), Member States were in strong agreement with the specific priorities outlined in the first and second MAWPs. The questionnaire responses indicate that Member States strongly prioritise certain objectives of the CCEI, particularly those related to addressing equipment shortages and enhancing customs controls across the Union. The first MAWP's focus on filling critical gaps in customs control equipment was widely seen as aligned with national priorities, while the second MAWP's emphasis on strategic BCPs and mitigating international conflicts and crises also received broad support. At the same time, the responses also reveal a disparity in how different objectives are valued. While enforcement-related goals are widely supported, innovation and sustainability rank lower on the list of priorities. Fewer Member States fully align with objectives aimed at promoting greener capabilities and fostering technological advancements. Interviews further confirmed this divide. While some customs administrations acknowledged the potential of the CCEI to drive innovation, most saw their primary focus as maintaining and strengthening existing enforcement and risk management capabilities.

Figure 10: To what extent are the priorities for the first Multi-Annual Work Programme (2021-22) still important for your country?



Source: Questionnaire responses from national customs administrations.

Figure 11: To what extent are the priorities for the second Multi-Annual Work Programme (2023-24) still important for your country?



Source: Questionnaire responses from national customs administrations.

While the CCEI design appears well-suited to provide essential equipment, some Member States see gaps in its design that limit its ability to fully meet their needs. A key concern is that certain complementary costs, such as infrastructure and IT systems, are not eligible for funding, even though they are often necessary for maximising the effectiveness of customs control equipment.

Some authorities argue that it reduces the programme's flexibility to address real-world implementation challenges. However, the exclusion of infrastructure is also a justifiable design choice. Expanding eligibility to infrastructure costs would not only further dilute the programme's already broad scope but also complicate funding allocation by making it difficult to define clear boundaries on what constitutes eligible infrastructure. Ensuring a targeted focus on customs control equipment prevents the programme from becoming too open-ended and difficult to steer strategically. Additionally, some specific needs are not fully reflected in the eligible equipment list, with Member States pointing to missing non-intrusive detection tools, officer protection gear, and environmental monitoring devices. While the current list broadly meets customs needs, some authorities have called for a more flexible and dynamic approach to eligibility to ensure the programme keeps pace with evolving enforcement challenges and technological advancements. This could help maintain the CCEI's relevance over time, but the same considerations on not broadening the programme design too much apply here.

Limited impact of the CCEI on innovation and standardisation so far

One of the intended objectives of the CCEI is to support the modernisation of customs control equipment, including fostering innovation and interoperability across Member States, as highlighted particularly by the second MAWP (2023-24). The programme is designed to provide some flexibility in how Member States address their specific needs, allowing them to apply for funding to procure a broad range of equipment, including state-of-the-art detection and scanning technologies. The eligible equipment list includes a variety of advanced tools, and the CCEI's scope is broad enough to accommodate forward-looking investments in customs technology. Interoperability in terms of equipment requiring dedicated software was further specified as a condition in the second call for proposals. However, while the design of the programme promotes interoperable software solutions and permits investment in innovative solutions, it does not strongly steer Member States towards innovation and data sharing. Member States can decide if they dedicate a part of their funding request to innovative solutions.

During the first call, the programme encouraged investment in cutting-edge technologies (as visible both in the first MAWP and call for application), but without a structured incentive or pressure to prioritise them. Even though the bidding is designed as a competitive process, the fact that the first call was not oversubscribed led to a non-competitive setting, in which customs authorities largely received what they applied for and leverage for steering was limited. As a result, the applications that received a low score on innovative elements in their projects still received funding.

Stronger guidance was introduced in the second call for applications, seeking to encourage greater focus on innovation and making interoperable software a condition for applications. This included higher scoring thresholds for innovation. Nonetheless, the changes to the approach of the second call reflect a broader challenge in aligning the instrument's strategic goals with Member States' procurement decisions, given that the CCEI does not impose strict requirements for investment in innovative solutions.

While the CCEI was conceived to encourage Member States to acquire advanced equipment, it does not currently include mechanisms specifically aimed at supporting the pre-procurement testing or piloting of emerging technologies for example via dedicated funding. The testing and validation of existing R&I technologies not always available in the market is a key stage in the innovation journey, and a unique opportunity for customs practitioners to adapt existing

solutions to their specific capability needs and operational environments. Some industry stakeholders and Member States have suggested that expanding eligibility to include AI-powered detection systems, or drone surveillance could increase the programme's relevance in driving technological advancements. On the other hand, although pre-procurement testing was mentioned by some stakeholders as a missing possibility, it is in fact already eligible under the current framework and the second call for applications specifies the possibility of renting or leasing innovative equipment.

The design of the CCEI places a focus on certain elements of standardisation and interoperability, particularly by requiring interoperable software for equipment requiring dedicated software and specifying technical standards for certain equipment – namely high-energy x-ray scanners and radiation and nuclear equipment.²⁴ The programme has, however, proved less relevant so far in terms of promoting standardised testing protocols²⁵ and data sharing among Member States. On these two aspects, some Member States showed some more reluctance than they did on innovation, as they did not necessarily agree that standardisation is a must and showed certain reservations on data sharing. They highlighted that efforts to improve data-sharing have been slow to develop partly due to cybersecurity concerns and geopolitical considerations, expressing concerns about sharing data across borders, particularly when certain types of customs equipment are sourced from non-EU manufacturers.

The programme design, without instruments for joint procurement or for centralised decisions on the most urgent needs, makes it difficult to drive a more coordinated approach to customs technology. Without stronger mechanisms for aligning Member State procurement with EU-wide customs strategies related to innovation, the CCEI's role in fostering a harmonised and modernised customs enforcement system remains constrained.

²⁴ The first CCEI call specifies that x-ray scanners must be compliant with the WCO standard for Unified File format 2.0, while the second call states that both high-energy x-ray scanners and radiation and nuclear equipment should align with the guidance developed by the CCEI coordination group (compliant with WCO standard for Unified File format 2.0).

²⁵ As mentioned above, the recent study on customs detection technologies recommended such protocols, which have not yet been implemented: European Commission (2024), *Customs control detection technologies: state-of-the-art, emerging customs control equipment and its testing*, study prepared for the European Commission by NTT Data.

5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

The CCEI is a funding programme designed to support the purchase, maintenance, and upgrading of customs control equipment in the EU. It has a budget of just above EUR 1 billion for the 2021-2027 period. Its ultimate aim is to help ensure the national customs administrations of the EU Member States are equipped to provide an adequate level of control, with equivalent results, at all of the EU's external borders. This is important because the Customs Union is only as strong as its weakest link, and the harmonised and effective application of customs controls is essential for the protection of the financial and economic interests of the EU and its Member States, for ensuring the safety and security of its residents, and for protecting it from illegal trade while facilitating legitimate business activity.

The CCEI has been implemented via two Multi-Annual Work Programmes (the first for 2021-2022, the second for 2023-2024) and two corresponding calls for proposals. These have led to the signature of grant agreements via which the CCEI provides co-financing to projects launched by national customs administrations to purchase, maintain and/or upgrade the equipment of their BCPs and/or laboratories. Following the first call (which closed in January 2022), 42 projects by 24 Member States were supported with a total of EUR 273 million of CCEI grant funding. Most of these projects are still ongoing, and several of them have had their duration extended. The second call (which closed in February 2024) granted a total of EUR 284 million for 47 projects by 25 Member States. These projects are only just getting started, and the majority are expected to end in 2027 or 2028.

As discussed in detail in the findings in the previous chapter, the CCEI is a valuable instrument with some notable emerging achievements in strengthening customs control capacities across the EU. However, there are areas that could be improved to maximise its effectiveness, efficiency, and impact on the harmonisation of customs practices. The rest of this chapter outlines both the main strengths and the problems identified / areas for improvement.

It is important to note that the evaluation findings are mainly informed by and reflect the experience of the first wave of projects, the majority of which started in 2022 and have yet to be completed. It is important to acknowledge that the first MAWP and call were exceptional in several ways, including their very broad priorities (aimed at filling existing gaps and addressing the most urgent needs of Member States) and the retroactivity clause (which allowed Member States to apply for co-funding for projects they had already launched and costs they had already incurred). Furthermore, this being the first-ever call, national customs administrations did not have any previous experience with the CCEI, which is also likely to have contributed to the difficulties and delays encountered by many projects. There are signs that some of the resulting issues and challenges have been addressed to some extent in the second MAWP and call, but the early stage of implementation means that tangible evidence of any improvements has not yet had time to emerge. Therefore, the conclusions reflect the situation as of early 2025, and that some elements may well appear different once the second wave of projects begin to make significant progress.

5.1 Conclusions – main achievements

Considering the current stage of progress with implementation, the CCEI can be deemed quite successful overall, in that it has responded to real policy and practical needs, and begun to provide support for equipment that is clearly relevant to strengthening controls at EU BCPs and

customs laboratories. It has done so in a way that is broadly effective and efficient. More specifically:

- **Relevance and value:** The CCEI directly addresses an important need within the EU: tackling the disparities in customs control equipment across Member States. This disparity, often stemming from budgetary constraints and varying national priorities that would otherwise have continued to persist, weakens the overall effectiveness of the Customs Union. The CCEI's value is underlined by the positive response from all 27 Member States, each having applied for and secured funding in at least one of the two calls so far. This widespread participation demonstrates the instrument's importance in bridging gaps and facilitating the modernisation of customs control equipment across the EU.
- **Coherence with EU priorities:** The CCEI operates in strong alignment with the broader strategic objectives enshrined in the Union Customs Code²⁶ and further outlined in the EU Customs Strategy and Customs Action Plan,²⁷ in particular the need for more modern, data-driven, interconnected and resilient customs systems, with enhanced risk management, data sharing, and cooperation among Member States. The CCEI directly contributes to these goals by providing the financial means for Member States to acquire state-of-the-art equipment, thereby bolstering their capabilities and supporting a more harmonised approach to customs control across the EU. The instrument has also demonstrated adaptability, with its MAWPs evolving to address emerging challenges such as security threats stemming from the war in Ukraine, drug trafficking and the rise of e-commerce.
- **Effective design, management and support:** The CCEI's main design features (including its budget, co-financing rate and eligibility criteria) are appropriate in view of its objectives. The beneficiaries regard the management of the instrument by DG TAXUD as effective and efficient and reported a high level of satisfaction with the guidance, communication, and administrative support provided.
- **Positive outputs and emerging results:** Despite some hurdles and delays (primarily related to national procurement processes, discussed further below) that have affected the implementation of many projects, the CCEI has begun to deliver outputs, namely over 900 pieces of equipment that were acquired with CCEI support to date, and are already helping to enhance the capabilities of the recipient BCPs and laboratories. While robustly measuring the precise impact of this equipment remains challenging at this early stage, the available data points to some early, emerging ways in which the instrument is making a positive contribution to strengthening the effectiveness and efficiency of customs controls and addresses the most urgent needs in the EU Member States. Feedback from Member States further shows that there is a high degree of confidence that the CCEI-supported equipment is being used in ways that do help to strengthen their capacity for, speed and/or accuracy of customs controls, and that, over time, the CCEI will make a

²⁶ Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code

²⁷ European Commission (2020): Taking the Customs Union to the Next Level: a Plan for Action. COM/2020/581 final

significant contribution towards its core objectives. Considering the dynamics, by the end of this programming period including by the end of the concluded grant agreements under the 2021-2027 CCEI calls, it is expected that the most urgent needs for customs control equipment in the EU Member States would be covered (delays in the implementation should also be fully considered in this context).

- **Additionality of funding:** The CCEI's financial support has proven to be genuinely additional in many (but not all) cases. For numerous Member States, particularly those facing budgetary constraints or with extensive external borders, the CCEI funding has been instrumental in enabling the purchase of customs control equipment that would have otherwise been unattainable. Thus, the financial support the CCEI provides contributes to a more level playing field within the Customs Union, allowing all Member States to contribute effectively to the common goal of adequate customs controls with equivalent results, regardless of their individual financial capacities and constraints

5.2 Lessons learned – areas for improvement

The CCEI has already taken important steps to address genuine needs and make a difference for many stakeholders. However, it also had to grapple with a complex institutional context in terms of the split in competences between customs policies set at European level and implementation by the Member States, which created challenges in terms of both design / structure and implementation. As a new instrument, the CCEI also suffered from some teething problems. The following paragraphs elaborate on the main problems and areas for improvement identified during the evaluation.

- **Implementation delays due to national procurement challenges:** Nearly half of the grants from the first call have had or are having their duration extended (with up to 30 months), which represents a significant delay considering the average initial duration of projects under the first call was already quite long (31 months), even without taking into account the time needed for the Commission to issue the work programme, run the call, evaluate the proposals, prepare and sign the grant agreements (which also took about 18 months). Most of the delays to project implementation were due to problems with procurement processes. Member States cited a wide range of issues, from a lack of expertise to uncertainty about how to exclude risky suppliers, to insufficient resources, all of which were problems in their own right, as well as creating knock-on effects like appeals and litigation. This is a critical dependency for the CCEI, because despite the importance of procurement for the success of the instrument, the projects are administered based on national legislation and processes over which the Commission has no direct control. Moreover, while action has been taken by DG TAXUD to identify and spread best practices, it remains a significant bottleneck.

Overall, there is a remarkably extended period between Member States' proposal for CCEI funded project and the successful implementation of the equipment on the field, exceeding 2 to 3 years in general for small projects, to up to 6 or 7 years for the most complex projects. A situation further aggravated by the above-mentioned delays, which justifies reviewing the implementation modalities of the instrument to ensure achieving its policy objectives.

- **Insufficient targeting and prioritisation:** The data-driven approach is meant to ensure that CCEI support is focused on the most significant risks and gaps across the EU. However, due to a combination of several factors (very broad priorities, lack of real competition, issues with the data), the first wave of projects responded primarily to national needs and priorities as identified by applicants (i.e. Member States) themselves, with little steer or corrective action to ensure they addressed the most pressing needs of the Customs Union as a whole. These main factors (as listed above) were still present under the second call, albeit to a lesser degree. Overall, this has meant that the extent to which the allocation of the funds has been effectively informed by a rigorous assessment of needs has been limited, and it is therefore not entirely clear whether the CCEI as implemented to date has ensured that the most significant gaps and needs at EU level are addressed as effectively and efficiently as possible.
- **Issues with the data model and reporting:** National customs administrations, while in principle understanding and supportive of the need for standardised data to inform and guide CCEI implementation, in practice found it difficult to comply with the data requirements, arguing that quantitative data for certain metrics is not collected in their Member States, is very burdensome to compile from various sources and ‘translate’ into the required format and categories, and/or is open to interpretation. The data Member States have submitted to DG TAXUD (as part of applications and reports on projects) is not always comprehensive or fully up to date, and there are significant concerns regarding its reliability and comparability. There are also issues with the way certain results indicators and corresponding targets have been defined in the Monitoring and Evaluation Framework. As a result, so far, the data that has been collected could only be used for its intended purposes (namely, to facilitate (i) the identification of gaps and needs so that CCEI funding can be targeted at these, as well as (ii) monitoring and evaluation of the CCEI and its impacts) to a much more limited extent than foreseen.
- **Uneven additionality:** While in many cases the CCEI undoubtedly funded the purchase of equipment that would not have been possible from other sources, Member States, as public authorities, are not required to demonstrate financial capacity in their applications, and instances of CCEI funding being used for equipment that would have been procured anyway with national resources were also evident. The proportion of projects with limited additionality was not possible to measure quantitatively, but it is worth mentioning that four of the ten projects examined as in-depth case studies fell into this category, though in some of these cases the CCEI funding still added value by speeding up necessary purchases, and/or potentially increasing (or at least protecting against possible budget cuts) the available resources for customs control equipment in the medium and longer term.
- **Limited impact on innovative, standardised and interoperable equipment:** The first and second CCEI calls aimed to address urgent needs and security, respectively, while other important aspects, like innovation, were encouraged but received little attention in the grants awarded so far. This misses the opportunities that more cutting-edge equipment presents for improving the effectiveness and efficiency of customs controls.
- **Siloed implementation and limited synergies with other programmes:** Despite the work of the CCEI Coordination Group, which acts as a forum for exchange and produces guidance and technical material for use by the Member States, including on aspects like

collaboration and the sharing of equipment and data, the implementation of actual CCEI grants has been a purely national affair. Applications are made based on national needs which lead to national purchase, deployment and operation, while the CCEI has not yet been used to any significant extent to facilitate interoperability and data sharing across Member States or to pursue joint procurement. This represents a missed opportunity to take advantage of the CCEI's potential to contribute to the mission of EU customs to act as one, as well as to improve controls. The problem is less severe for customs laboratories, since these already collaborate extensively via the CLEN. Though the CCEI Coordination Group could come to fill this function for BCPs, it has not happened yet, potentially because of fragmentation across several pre-existing groupings like CELBET and European Ports Alliance. Beyond the Customs programme, evidence of practical synergies with other EU programmes was also limited.

During the remainder of the CCEI's programming period DG TAXUD will address all aspects that have been identified for improvement to ensure the achievement of the Instrument's general and specific objectives.

ANNEX I: PROCEDURAL INFORMATION

Directorate-General Taxation and Customs Union (DG TAXUD) was in the lead in the process to prepare the interim evaluation of the Customs Control Equipment Instrument by the Commission.

Decide planning reference: PLAN/2024/1189.

Commission work programme reference: item 33 in Annex II to Commission Work Programme 2025²⁸.

An inter-service steering group (ISSG) was established to oversee the evaluation exercise. The ISSG comprised representatives of the Secretary General, DG BUDG, the Legal Service, OLAF, the Joint Research Centre, DG HOME, DG GROW and DG ENV.

The preparation for the interim evaluation began in the second half of 2023. The Call for evidence document was finalized in May 2024, after the approval of the inter-service steering group. The Call for evidence was published for consultation and feedback on the EU's Have Your Say Portal between 12 June 2024 and 10 July 2024.

The evaluation by the Commission was supported by an external, independent study. The terms of reference for the study were approved by the ISSG. The tendering procedure was performed by DG TAXUD from May to August 2024. The contract to carry out the study was awarded to a consortium led by Economisti Associati. The study was delivered by Ipsos (lead partner for the assignment) and Syntesia, on behalf of the consortium led by Economisti Associati from September 2024 until May 2025. The inter-service steering group monitored the performance of the study by reviewing key deliverables (inception report, progress report, draft final report and final report) and improving their quality. The ISSG held nine meetings over the period from April 2024 to May 2025. The study final report was published in July 2025 on the website of the EU Publications Office.

After the final study report was delivered, in June 2025 DG TAXUD started drafting the staff working document, based on the external study and the analysis of its own documents, reports and databases. The contractor used a variety of research methods and sources in the supporting study (for more details see annex 2).

The fact that the interim evaluation took place at an early stage in the programme's implementation, with only a small number of projects completed at the time of the exercise, represents a limitation regarding the extent to which firm conclusions can be drawn on results and impact. The CCEI is a compact programme in terms of scope of its activities and number of beneficiaries. All stakeholder consultation activities were carried out as planned (for more details see annex 5). All beneficiaries of the Instrument, the 27 Member State customs authorities participated in the stakeholder consultation activities to have sufficient evidence base for the conclusions.

²⁸ COM(2025) 45 final, dated 11.2.2025

The interim evaluation of the Customs Control Equipment Instrument (CCEI) 2021-2027 by the Commission was supported by an external study carried out by Ipsos and Syntesia. This annex outlines the methodology and analytical approach employed by the study. The following sections detail the overall approach, the data collection methods, and the process of analysing and interpreting the gathered data underpinning the mid-term assessment of the Instrument.

Overall approach

The methodology was designed to answer the evaluation questions (EQs) outlined in the terms of reference (as amended during the inception phase) and covers the five evaluation criteria as set out in the Better Regulation Guidelines (effectiveness, efficiency, relevance, coherence, and EU added value). These EQs were further developed into an evaluation matrix (see Annex 3), which also defined corresponding specific judgment criteria, indicators, and data sources for each evaluation question.

With respect to the analytical approach for the study, a mixed-methods, theory-based approach was deemed most appropriate. Specifically, this entailed comparing the CCEI's Intervention Logic (developed as part of the Monitoring and Evaluation Framework) – and which includes the envisaged activities, outputs and results, as well as key underlying assumptions – with the practical experience of the Instrument's implementation to date. This approach aimed to ascertain the extent to which the instrument is working as intended, identify progress towards achieving the objectives, and highlight any shortcomings, challenges or bottlenecks.

Given that the Instrument is at an early stage of its implementation, the approach was also tailored to the interim and formative nature of the evaluation. More specifically, not all first call projects were completed when the study was conducted, and the second call projects were just getting under way. As such, and in line with the terms of reference, this study and its underpinning approach focus “on confirming the validity of the shared common vision and initial design”, and on “identifying weaknesses to increase the maturity of the CCEI data-driven approach for policy making for the subsequent invitations to submit proposals and find potential improvements”. To this end, the study provided lessons learnt supporting the formative assessment.

The study relied on a combination of qualitative and quantitative evidence. In addition to desk research, the study drew on a wide range of methods to ensure the key beneficiaries of the CCEI (i.e. customs authorities) as well as other stakeholders were consulted and provided with an opportunity to share detailed feedback on their experience of taking part in and benefitting from the Instrument.

Data collection methods

To collect the primary and secondary, qualitative and quantitative evidence needed to address all the evaluation criteria and questions, using the judgment criteria, indicators and data sources outlined in the evaluation matrices, the study relied on the following methods:

- Desk research;
- Stakeholder consultations, including a written questionnaire, in-depth interviews, and a stakeholder workshop; and
- Case studies.

These data collection methods are set out in more detail below.

Desk research

A systematic desk research programme was conducted to compile, review, analyse and extract relevant evidence from a range of sources including policy and programming documents, CCEI proposals, DG TAXUD recommendations and grant agreements, amendments and periodic reports submitted by Member States and, importantly, the data collected under the CCEI's Monitoring and Evaluation Framework.

Desk research was crucial in ensuring secondary data on the context, design, implementation and performance of the CCEI was duly considered and taken into account. Key documents reviewed included:

- CCEI legal basis (e.g., CCEI Regulation (EU) 2021/1077).
- Customs policy documents.
- CCEI planning documents, including MAWPs, calls for proposals, etc.
- CCEI monitoring data, e.g. time to notify, time to grant etc.
- CCEI application templates and applications for the countries selected as part of the case study selection.
- DG TAXUD recommendations to Member States (MS) following the review and assessment of their CCEI applications.
- CCEI data model, including the classification of CCE, the risk assessment matrix and template etc.
- MEF data and methodology, including the definition of the monitoring indicators and the limitations and issues reported by DG TAXUD
- Other relevant documents and studies.

This research provided context for the CCEI's broader policy framework, implementation progress, and monitoring efforts. It also informed the study's assessment of the CCEI data model's effectiveness in addressing risk and equipment coverage at BCPs and customs laboratories.

Stakeholder consultations

An extensive stakeholder consultation programme was designed and delivered. This included three forms of data collection, namely, (i) a written questionnaire for Member State custom authorities, (ii) in-depth interviews with inter alia CCEI implementers and beneficiaries and the CCE industry, and (iii) a validation workshop with customs administrations.

Written questionnaire

The purpose was to collect input from the national customs administrations of all participating Member States, in a way that would facilitate the aggregation and comparison of the responses. The rationale for relying on a written questionnaire (rather than an online survey) was based on previous DG TAXUD assignments, where this approach had been successfully trialled and allowed for the collection of consolidated responses per Member State. In terms of the questionnaire's content, it was designed to balance simplicity (with a view to maximising the response rate) with the need for comprehensive information on the CCEI and its implementation to date. A response rate of 100% was achieved, in other words responses were received from all 27 Member States. Most Member States submitted a single response, but a few sent separate responses from those responsible for BCPs and customs laboratories, respectively. The data collected provides rich information and important evidence on the CCEI's implementation. The

responses are analysed and used extensively in Annex 3 (detailed answers to the evaluation questions).

Interview programme

Complementing the written questionnaire, a comprehensive interview programme was also delivered and targeted at key stakeholder groups that are important in the implementation of the Instrument. In total 49 interviews were conducted, including those conducted for the case studies. More specifically, CCEI implementers (i.e. DG TAXUD) as well as other DGs (e.g., OLAF) were consulted including as part of the case study research (i.e. DG TAXUD project officers). Second, CCEI beneficiaries, i.e. national customs authorities, were also targeted both as part of the main interview programme but also as part of the case study research (see below for more information). Third, seven CCE industry organisations were interviewed, including several companies as well as the European Organisation for Security (EOS). In addition, three interviews with expert groups were also conducted, which included CELBET and the World Customs Organization (WCO).

In terms of the sequencing of the interviews, first five familiarisation interviews with representatives of various DG TAXUD units (A.1, E.3 and B.5) were conducted during the study’s inception phase to collect initial feedback and insight on the Instrument’s genesis, its policy context, programme management, the data model, and other relevant aspects. The scoping interviews also provided valuable initial insights on the CCEI’s implementation towards the third and fourth quarter of 2024, as well as potential achievements and challenges that were investigated further during the remainder of the study. In addition, the interviews provided an opportunity for DG TAXUD to convey its priorities, specific areas of interest and expectations for the evaluation.

This was followed by the interview programme ‘proper’, which was conducted in two ‘waves’:

- Wave 1: targeting relevant Commission services such as OLAF and the JRC, but also CELBET and the WCO as relevant expert groups. In addition, as mentioned above, seven industry organisations (including both SMEs and large enterprises) were interviewed.
- Wave 2: primarily targeting customs authorities that were not interviewed as part of the case studies (see below), in order to gather additional input from them and, where appropriate, follow up, clarify and expand on their questionnaire responses. In total, interviews were conducted with representatives of 14 Member States.

In addition to the above, a couple of ad-hoc interviews with DG TAXUD were conducted to gather additional evidence on the implementation of the Instrument, discuss any areas of doubt raised by the research and review of the MEF data and the underpinning CCEI data model.

The table below provides an overview of the interview programme including the number of interviews conducted.

Table 6: Summary of the interview programme

Main groups	Interviewees	Topics discussed
National customs authorities	<p>Wave 2 interviews:</p> <ul style="list-style-type: none"> • BG, CY, DE, DK, FR, HU, IE, LT, LU, LV, MT, PT, SE and SK. <p>Case study interviews:</p> <ul style="list-style-type: none"> • AT, BE, EE, ES, HR, IT, FI, NL, PL and RO 	<ul style="list-style-type: none"> • Main needs as regards customs control equipment, and extent to which this coincides with CCEI rules and priorities • Views and experiences on CCEI design, incl. MAWPs, calls for proposals • Main reasons for applying for CCEI funding (or not) • Views and experiences on CCEI implementation and operations, incl. grant management, data model, etc. • Assessment of progress towards achieving objectives, drivers and barriers of success, (expected) impacts on operational

Main groups	Interviewees	Topics discussed
	Total: 27*	<ul style="list-style-type: none"> work Costs and burdens associated with CCEI Unmet needs, room for improvement and suggestions for changes
Relevant expert groups	Wave 1: <ul style="list-style-type: none"> CEL BET WCO TEG-NII Total: 2	<ul style="list-style-type: none"> Effectiveness of CCEI governance and coordination Usefulness of different groups and networks Extent to which the work and deliverables of relevant expert groups are considered in CCEI design and implementation Main needs as regards customs control equipment, and extent to which this coincides with CCEI rules and priorities Unmet needs, room for improvement and suggestions for changes
European Commission and other EU Institutions	Scoping interviews: <ul style="list-style-type: none"> DG TAXUD (x5) Wave 1: <ul style="list-style-type: none"> JRC OLAF (x2) Case studies: <ul style="list-style-type: none"> DG TAXUD project officers (x3) Ad-hoc interviews: <ul style="list-style-type: none"> DG TAXUD (x2) Total: 13	<ul style="list-style-type: none"> Reasons for and views on CCEI design, incl. MAWPs, calls for proposals. Practical experiences with CCEI implementation, incl. quality of applications, functioning of key procedures Functioning of the CCEI data model Assessment of progress towards achieving objectives, drivers and barriers of success Coherence, complementarities or overlaps with other key EU policies and programmes Efficiency of coordination with other DGs regarding the preparation of work programmes to avoid overlap and promote synergies Scope for further simplifications, other improvements
Customs Control Equipment Industry	Wave 1: <ul style="list-style-type: none"> Arktis Detectors CAEN European Organisation for Security (EOS) Halo Xrays Rapsican Systems Rhode Schwarz Smiths Detection Total: 7	<ul style="list-style-type: none"> National procurement, including the transparency of the process and requirements. Joint procurement Supply bottlenecks Innovate customs control equipment and the extent to which the CCEI has been successfully at supporting their deployment. Cybersecurity
Total	49	

* NB: As part of the case studies, more than one interview was carried out with a few national customs authorities. In many other cases, two or more officials took part in the same interview. The numbers above relate to the number of separate interviews conducted, not the number of participants (which would be significantly higher).

Validation workshop

In addition, an online validation workshop was held towards the end of the study, when all other data collection had been finalised. The workshop was designed to provide representatives of national customs authorities with an opportunity to review, validate, and, where needed, contribute to refining the preliminary and emerging results of the study. The agenda included:

- The presentation of the key preliminary findings by the study team
- Discussion of the findings in breakout groups
- Plenary discussion (including a summary of the main points from each breakout group and a discussion of the future of the CCEI)
- Wrap-up and next steps

In total, 40 representatives of the national customs administrations from 19 different Member States attended the workshop (in addition to representatives from DG TAXUD and the study team). The workshop confirmed most of the preliminary findings that were presented, but it was

also important in refining certain findings and conclusions / lessons learnt as they are presented in this report.

In summary, a critical mass of stakeholder feedback was gathered across all relevant and targeted stakeholder groups, which included DG TAXUD involved in the design and implementation of the CCEI, other DGs also relevant because, in part, of their involvement in the implementation process as well as expert groups on customs. Customs authorities were consulted via all three stakeholder consultation methods and were able to provide expertise feedback. To further investigate, among others, issues with public procurement CCE industry representatives were also targeted, and seven manufactures and/or vendors were interviewed to better understand their experience with public procurement procedures and practices and assess the overall ability of the existing supply of CCE to meet the demand induced, in part, by the CCEI.

Case studies

Ten case studies were conducted on projects launched in response to the first CCEI call for proposals. The purpose of the case studies was to explore early outputs, results, procedural experiences, and illustrate key factors affecting implementation.

The unit of analysis for each case study was an individual grant (for either a BCP or a Labs project), rather than the recipient country, so as to allow for an in-depth investigation of the specifics of the selected projects. Moreover, given that projects from the second call have only just commenced (meaning that evaluating their limited progress would be somewhat reductive) at the time the research was carried out, the case studies only looked at grants from the first call. This approach allowed the study to more closely examine the dynamics and specificities of each grant and better explore the effects of CCEI funding, including any difficulties and issues faced during implementation and their root causes, as well as illustrate success stories and good practices.

Within the overall portfolio of CCEI projects (and two principal categories of grants), there is considerable variety in terms of grant size, project maturity, and equipment type, which the case studies had to capture. Furthermore, it was imperative that the case studies cover different regions of the EU as well as the different predominant types of customs entry points, including external land borders, sea, and airports. Balancing these different considerations required a purposeful sampling approach, which included the following criteria:

- Balance between BCPS and Labs: eight BCP projects and 2 custom Laboratory projects were selected.
- Geographical balance: The selected projects represent a diverse range of EU Member States, including both larger and smaller countries from different regions. This ensured the evaluation captured varied national contexts and implementation challenges across the EU.
- Range of grant sizes: Both large-scale projects with substantial funding and smaller initiatives were included. This variety allowed for an assessment of how the scale of funding impacts project implementation and outcomes.
- Variety of equipment types: The case studies cover a wide spectrum of customs control equipment, including non-intrusive inspection systems, detection devices for hidden objects, radiation detection equipment, and laboratory analysis tools. This diversity helps evaluate the CCEI's effectiveness across different technological domains.
- Different stages of project completion: The sample includes projects at various implementation stages, from those recently initiated to those nearing completion or

already finished. This range provides insights into challenges and successes at different project phases, offering a comprehensive view of the CCEI's impact over time.

The table below provides an overview of the sample selected for the case study and the rationale for inclusion of the ten grants.

Table 7: Overview of the ten CCEI first call project case studies

#	Project title	Member State	EU contribution	Reasons for selection
BCPs				
1	Different scan and detection equipment	The Netherlands	EUR 23,681,372	Selected due to its strategic importance, hosting Europe's busiest seaport (Rotterdam) and one of its busiest international airports. The Dutch BCP grant is among the largest, offering insights into the implementation of substantial CCEI funding.
2	Purchase of mobile X-ray for seaports	Estonia	EUR 2,404,000	Chosen for its unique challenges, particularly security-related procurement issues identified during scoping interviews. It represents a smaller BCP grant focused on a strategically significant border point, providing perspective on CCEI implementation in smaller-scale projects.
3	Belgian customs – proposal for BCP	Belgium	EUR 19,879,200	Highlighted during scoping interviews due to significant mid-implementation project modifications, offering valuable insights into adaptive project management. The large grant size reflects Belgium's importance in EU trade, hosting one of Europe's busiest seaports in Antwerp.
4	Development the efficiency of the customs control activity of the Romanian Customs Authority	Romania	EUR 13,746,640	Selected for its sizeable grant (EUR 14 million) and strategic location on the EU's southeastern external land border. The case study explored identified risks such as staffing issues and procurement difficulties, as well as the reasons for and implications of the project extension.
5	Strengthening the operational capabilities of the Polish National Revenue Administration	Poland	EUR 25,840,800	Chosen as the second-largest BCP grant, supporting a major land border that has gained increased strategic importance following Russia's invasion of Ukraine. This case study examined how CCEI funding adapts to evolving geopolitical contexts.
6	Spanish Customs Non- Invasive Inspection Capacity Enhancement	Spain	EUR 3,707,652	Included as a completed and successful grant, as identified in scoping interviews. It ensures representation of southwestern Europe and smaller BCP grants, providing insights into efficient project implementation and closure.
7	Securing Europe, improving Finnish BCPs	Finland	EUR 16,807,401	Selected for its innovative features, including a unique collaboration structure, reverse procurement processes, and specialised equipment (radiation and nuclear detection). The involvement of the national nuclear authority adds an interesting dimension to multi-agency cooperation. In addition, Finland's large external land border also adds to its strategic relevance.

#	Project title	Member State	EU contribution	Reasons for selection
8	Customs Control Equipment fulfilling the gaps on external EU border for Croatian Customs	Croatia	EUR 2,099,392	Chosen for its varied and comprehensive approach, as noted in scoping interviews. As a smaller BCP grant, it ensures representation of southern and Mediterranean Europe, offering insights into diverse equipment needs and implementation strategies.
Customs Laboratories				
9	Equipment for food analysis and analysis of mineral oil and mineral oil preparations	Austria	EUR 162,879	Selected as one of the few completed laboratory projects, also noted as successful during scoping interviews. This case study provides valuable insights into the full project lifecycle and outcomes for customs laboratories.
10	Upgrade and improvement of customs control equipment for the development of trade and interinstitutional cooperation – Customs Laboratories	Italy	EUR 4,880,000	Chosen as the largest laboratory grant, offering perspective on substantial CCEI funding for customs labs. Italy's extensive maritime border adds context to the importance of well-equipped customs laboratories in supporting border control efforts.

For each case study, relevant documentation was reviewed, and interviews were conducted with project stakeholders (namely, representatives of the national customs administration who were involved in the implementation and coordination of the project in question, and the responsible DG TAXUD project officers). This approach provided concrete examples of CCEI implementation and its effects on customs operations. The information from the case studies was triangulated with the evidence from the other research strands and fed into the evaluation findings and conclusions.

Data analysis and interpretation

During the study's final stage, the collected evidence across all research strands was synthesised and analysed to develop robust conclusions and practical recommendations. Key elements included:

- Quantitative analysis: Numerical data, including CCEI monitoring and MEF data and quantitative responses from the customs administrations questionnaire, was processed using Excel. Results were presented in tables, charts, graphs, and maps to illustrate key findings.
- Qualitative analysis: A substantial portion of the evidence base consisted of qualitative data capturing feedback, views and satisfaction with the Instrument, particularly in the case of customs administrations. Stakeholder feedback was systematically analysed against the evaluation questions (see Annex 3). To support the analysis, a data analysis grid was created to harvest and compare feedback within and across stakeholder groups.
- Follow-up research: Where necessary, the team re-contacted stakeholders to verify findings and clarify ambiguities, ensuring the accuracy of our interpretations. These included, for instance ad-hoc interviews with DG TAXUD to further discuss the data model and MEF data.

- Triangulation and interpretation: Finally, the findings and evidence were compared across different methods and key differentiators to assess their validity and consistency. This process involved:
 - cross-referencing findings from various sources;
 - assessing the strength of underlying evidence;
 - reconciling inconsistencies where possible;
 - formulating responses to each evaluation question based on the weight of evidence; and
 - clarifying caveats, uncertainties, and limitations of the evidence.

The results of the triangulation exercise and interpretation of the data are presented in the next annex which contains the detailed answers to the evaluation questions against the evaluation framework.

ANNEX III. EVALUATION MATRIX AND ANSWERS TO THE EVALUATION QUESTIONS

This annex contains the detailed responses to the 14 evaluation questions under the five evaluation criteria of effectiveness, efficiency, relevance, coherence and EU added value. An evaluation “matrix” consisting of judgment criteria, indicators and sources of evidence was developed to clarify how each question was to be answered. These matrices are reproduced in the ensuing sections for each evaluation criterion, followed by the responses to the corresponding questions.

Effectiveness

Under effectiveness, the evaluation set out to answer four questions. These questions, and the corresponding judgment criteria, indicators and data sources are shown in the table below. The subsequent sub-sections present the evidence and answers question by question, following the criteria and indicators as previously defined to the greatest extent possible.

Table 8: Evaluation matrix for Effectiveness

Evaluation questions	Judgment criteria	Indicators	Data sources
1. How effective has the CCEI been in progressing towards its objectives ? To what extent is this progress in line with initial expectations? What have been the most prominent qualitative and quantitative benefits of the CCEI to date, and for whom?	Extent to which the envisaged <i>activities</i> have been delivered	Budget execution rate to date (i.e. total amount of grant agreements signed vs available funds) Number of projects completed / ongoing / delayed / cancelled	<ul style="list-style-type: none"> • CCEI monitoring data
		Feedback from stakeholders on CCEI implementation, in particular on the extent to which the main assumptions to move from inputs to activities (as spelled out in the MEF) have held true	<ul style="list-style-type: none"> • MS questionnaire responses • Stakeholder interviews • Workshop
	Progress made towards the envisaged <i>outputs</i>	Evolution of output indicators as defined in the MEF: equipment purchased, maintained or upgraded (OP 1.1); use of equipment (OP 1.2); satisfaction of customs administrations with CCEI support (OP 1.3)	<ul style="list-style-type: none"> • CCEI monitoring data
		Feedback from stakeholders on CCEI outputs, in particular on the extent to which the main assumptions to move from activities to outputs (as spelled out in the MEF) have held true	<ul style="list-style-type: none"> • MS questionnaire responses • Stakeholder interviews • Workshop
	Progress made towards the envisaged <i>results</i> and <i>impacts</i>	Evolution of results indicators as defined in the MEF: Specific results achieved by MS (RES 1.1); contribution to equivalent results (RES 1.2); adherence to the common list of equipment (RES 1.3); coverage of risks and threats (RES 1.4); contribution to the implementation of the CRMF (RES 2)	<ul style="list-style-type: none"> • CCEI monitoring data
		Feedback from stakeholders on CCEI results, in particular on the extent to which the main assumptions to move from outputs to results (as spelled out in the MEF) have held true	<ul style="list-style-type: none"> • MS questionnaire responses • Stakeholder interviews • Workshop
		Extent to which CCEI has ensured equipment is secure and safe (in terms of protection of data, cyber-resilience) and environmentally-friendly (incl. as regards the disposal of the replaced equipment)	<ul style="list-style-type: none"> • MS questionnaire responses • Stakeholder interviews • In-depth case

Evaluation questions	Judgment criteria	Indicators	Data sources
			studies
2. What were the factors driving or hindering progress towards the objectives and to what extent are they linked to the CCEI or to external factors (outside the remit of the CCEI)?	Extent to which internal factors (within the remit of the CCEI) are driving or hindering progress	Internal drivers and barriers identified in CCEI APRs, M&E data, policy and programming documentation and relevant external sources	<ul style="list-style-type: none"> Document review
		Feedback from stakeholders on the effectiveness of key CCEI provisions and parameters, incl. timeframes, general eligibility rules, funding priorities per call, needs assessment, data requirements, guidance, programme management, etc.	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews Workshop
		Concrete effects (positive and/or negative) of different internal factors on the implementation, progress and results of specific CCEI projects	<ul style="list-style-type: none"> In-depth case studies
	Extent to which external factors (outside the remit of the CCEI) are driving or hindering progress	External drivers and barriers identified in CCEI APRs, M&E data, policy and programming documentation and relevant external sources	<ul style="list-style-type: none"> Document review
		Feedback from stakeholders on the effects of external factors, incl. MS customs' resources and administrative capabilities, geopolitical factors, supply issues (price volatility, cybersecurity concerns), etc.	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews Workshop
		Concrete effects (positive and/or negative) of different external factors on the implementation, progress and results of specific CCEI projects	<ul style="list-style-type: none"> In-depth case studies
3. To what extent is the CCEI used by the Member States and what are the factors that encourage or hinder its use?	Level of demand for CCEI funding	Number of MS that have applied for CCEI funding in response to the 1 st and 2 nd calls for proposals per category (BCPs / labs)	<ul style="list-style-type: none"> CCEI monitoring data
		Amount of funding requested and awarded to date (per MS) relative to the available amount per call and category (BCPs / labs) and type of BCP	<ul style="list-style-type: none"> CCEI monitoring data
	Reasons that encourage or hinder MS use of CCEI	Feedback from MS customs administrations on the reasons for (not) applying for (more) CCEI funding, e.g. level of alignment with key needs and challenges, absence / scarcity of alternative funding sources, administrative capacity, awareness, other factors	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews Workshop
		Concrete effects (positive and/or negative) of different internal or external factors on the use of CCEI in the context of specific CCEI projects	<ul style="list-style-type: none"> In-depth case studies
4. What factors are limiting the use of the CCEI data model and what is necessary to use it to its full potential?	Relevance, quality and practicality of the CCEI data model	Assessment of the comprehensiveness, granularity, clarity and user-friendliness of the data model and requirements	<ul style="list-style-type: none"> Document review Stakeholder interviews (DG TAXUD)
		Level of MS compliance with data requested by the EC (in terms of quantity and quality), and ease / difficulty for national customs to provide the data	<ul style="list-style-type: none"> Document review MS questionnaire responses Stakeholder interviews
	Extent to which the CCEI data model is fit for its purpose	Stakeholder feedback on the usefulness in practice of the data that has been collected to date for the purpose of CCEI programming, priority setting, identification of needs and assessment of applications	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews Workshop
		Stakeholder feedback on the usefulness in	

Evaluation questions	Judgment criteria	Indicators	Data sources
		practice of the data that has been collected to date for the purpose of CCEI reporting, monitoring, analysis and evaluation	<ul style="list-style-type: none"> In-depth case studies
		Stakeholder suggestions for improvements of the model, and extent to which these would be likely to facilitate its greater use	

EQ 1. *How effective has the CCEI been in progressing towards its objectives? To what extent is this progress in line with initial expectations? What have been the most prominent qualitative and quantitative benefits of the CCEI to date, and for whom?*

To respond to this evaluation question, the different levels of the intervention logic were considered, namely whether the envisaged activities have been delivered, and to what extent they have facilitated progress towards the expected outputs and results. It is considered how far key assumptions needed for the causal chain to function as expected (as identified in the intervention logic) have proven to be correct, what benefits have been obtained to date, and what additional benefits the CCEI is likely to contribute to going forward. The key factors that have driven or hindered progress are discussed in more detail under subsequent questions, in particular EQ 2.

Extent to which the envisaged activities have been delivered

The main activity envisaged for the CCEI is the provision of financial support for the purchase, maintenance and upgrade of customs control equipment. In practice, this support (up to 80% of the total cost of the equipment in question) is provided to specific projects implemented by the national customs administrations of EU Member States, which are selected by the European Commission based on applications submitted by the Member States in response to calls for proposals.

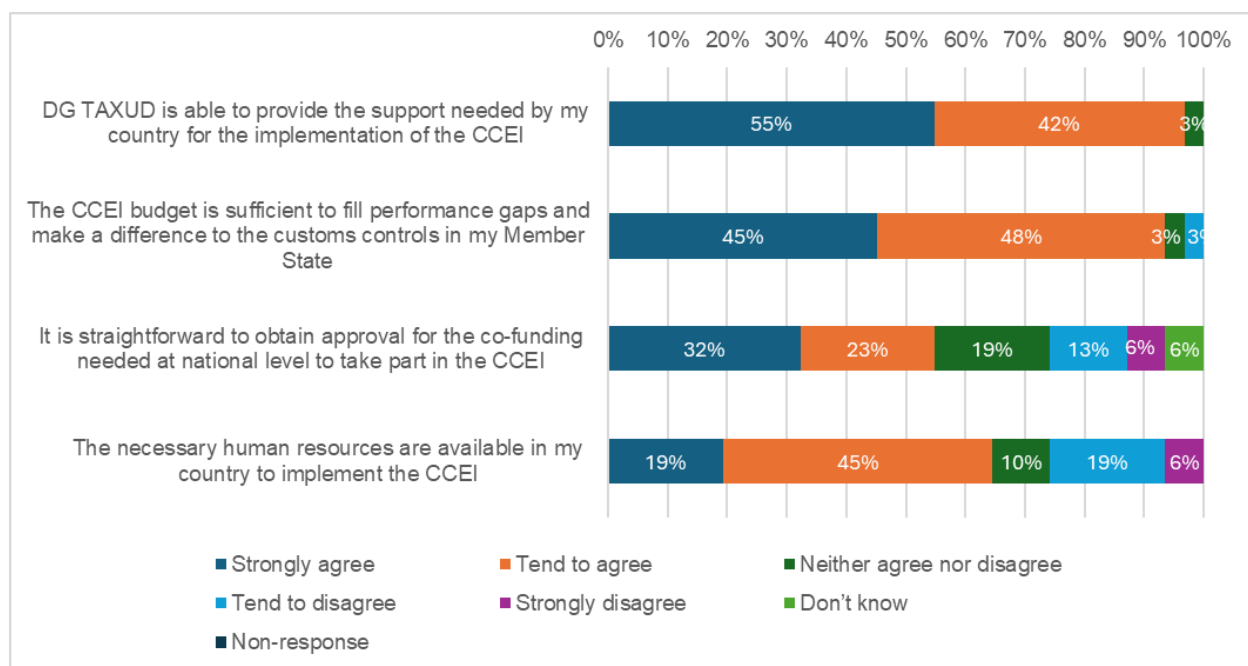
Two Multi-Annual Work Programmes (MAWPs) and corresponding calls for proposal have been published under the CCEI. The first call, in November 2021, led to the signature of grant agreements for 42 projects, which were awarded a total of EUR 273 million of EU co-financing. Most of these projects were still ongoing in mid-2025. Several of the original grant agreements have been subject to amendments, in many cases extending their duration. The second call, launched in December 2023, is expected to lead to the signature of grant agreements for 47 projects (most of which were signed at the end of 2024, but one still pending in mid-2025) with EU co-financing totalling EUR 284 million. Some of these projects were officially started in 2024, but the majority is to be launched in the first half of 2025. The EU co-financing amounts mentioned above for the grants awarded after the two calls for proposals correspond to a budget execution rate very close to 100% of the available funds.

All 27 Member States have received support for one or more projects under at least one of the calls; the majority has benefited and/or is benefiting from both. However, the size of the grants varies significantly, with Bulgaria, Poland, Italy, the Netherlands and Romania having been awarded the highest amounts (totalling more than EUR 40 million each for projects under both calls). Across all calls, projects and countries, around 88% of the EU funding was for equipment for BCPs, while a much smaller amount (approx. 12%) was for equipment for customs laboratories.

Among the key assumptions identified in the MEF that are needed to move from inputs to activities and beyond is the availability of sufficient financial and human resources at both EU and national levels. Based on the questionnaire responses, national customs authorities viewed the resources at EU level as sufficient: a large majority of responding MS officials at least tended to agree that the CCEI budget is sufficient for filling performance gaps and making a difference

to their customs controls, and was highly satisfied with the support that TAXUD is providing to the implementation. In this context, it is also worth noting that neither of the first two calls were significantly oversubscribed, i.e. that the demand for EU funding was closely aligned with the supply, suggesting that the CCEI budget has not been a constraining factor so far (for further details on this, see EQ 3). However, there were much lower levels of agreement, as well as an element of disagreement, with statements relating to the availability of resources at national level, suggesting that not all MS find it easy to obtain the necessary national co-funding, or have available sufficient human resources to implement the CCEI. In their additional comments, some MS stressed that co-funding can pose a significant problem in some cases, and that not all customs authorities have staff specifically dedicated or trained for this type of grant management and implementation.

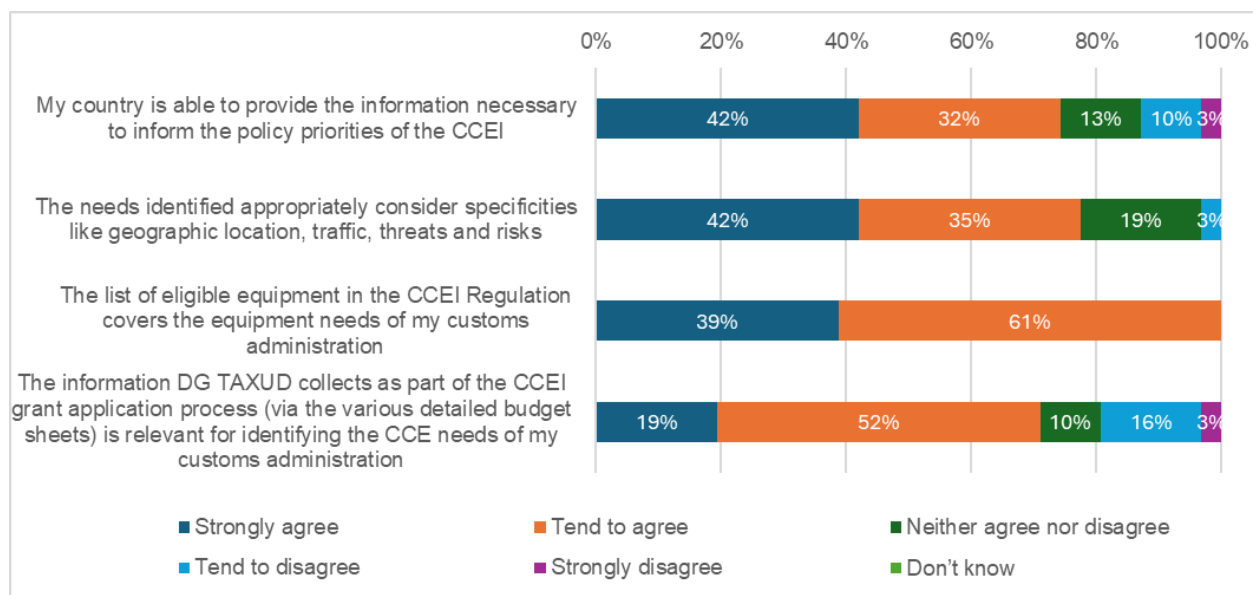
Figure 22: Please express your level of agreement with the following assumptions related to the available resources for the instrument



Source: Questionnaire responses from national customs administrations

Another important set of assumptions / prerequisites identified in the MEF concerns the ability to effectively assess, identify and address needs. Again, based on their questionnaire responses, all national customs authorities agreed or tended to agree that the list of equipment that is eligible for CCEI co-funding is aligned with their needs (though with some caveats, which are considered under EQ 2 below). The majority also believed that, by and large, the needs are identified appropriately, and that they were able to provide the information necessary to inform the CCEI priorities. However, only a small proportion agreed strongly – and a similar proportion disagreed – that the information they have to submit as part of CCEI grant applications (via the detailed budget sheets) is relevant for identifying the needs of their administration. This is in line with other concerns raised about the CCEI data model, which are discussed in greater detail under EQ 4.

Figure 13: Please express your level of agreement with the following statements about the CCEI's ability to identify the needs of your country.



Source: Questionnaire responses from national customs administrations

The final set of assumptions at this level in the MEF relates to the transparent and appropriate allocation of the funds. In this respect, national customs authorities did not have any concerns: in their questionnaire responses, at least 90% agreed (including 65% who agreed “strongly”) that CCEI funding is allocated by the Commission transparently based on the defined award criteria, and that funding allocated conforms to the CCEI’s priorities. Not a single respondent disagreed with either of these statements.

The interviews and case studies provided additional insights into the various factors that have driven or hindered progress; these are discussed under EQ 2 below.

Progress made towards the envisaged outputs

The envisaged outputs of the CCEI are improvements in the extent to which customs offices (BCPs and laboratories) are equipped with customs control equipment that is properly functioning, modern, reliable, safe, and environmentally friendly. The progress towards this is to be measured via a series of Output (OP) indicators defined in the MEF.

The first indicator (OP 1.1) concerns the number of pieces of equipment that were purchased, maintained or upgraded through CCEI funds. Based on the data submitted by the Member States, the total achieved by end 2024 was 907 pieces of equipment, which is 47% of all pieces that Member States originally intended to purchase, maintain or upgrade as part of projects under the first call. The highest numbers corresponded to ‘Radiation detection and nuclide identification’ (227 units purchased, maintained or upgraded) and ‘Non-intrusive inspection’ (175 units) equipment for BCPs, and ‘Analytical Instruments and Analysers’ (110 units) for laboratories.

Table 9: Pieces of equipment purchased, maintained or upgraded through CCEI funds

	Equipment supported by the CCEI (as of end 2024)				Target under call 1	% of target achieved
	Purchased	Maintained	Upgraded	Total		
BCPs	546	20	7	573	1,398	41%
Laboratories	299	35	0	334	524	64%

Total	845	55	7	907	1,922	47%
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The second indicator (OP 1.2) concerns the utilisation of the equipment purchased, maintained or upgraded through CCEI funds, which is measured by the ‘occupancy rate’, indicating the frequency of equipment use (a 100% occupancy rate means “daily use”). Analysis of the 2024 data reveals that the actual usage is closely aligned with the targets for all equipment types. Equipment at BCPs is used very frequently, with occupancy rates above 90% for most categories of BCP equipment. Occupancy rates of laboratory equipment tend to be a little lower (between 50 and 70%), but also in line with targets. This suggests that, overall, the equipment is used extensively and in line with expectations.

The third output indicator (OP 1.3) measures national customs administrations’ satisfaction with the guidance, programme management, and timeliness of support provided by the CCEI. It incorporates data from surveys addressed to MS in 2022, 2023, and 2024, which show that satisfaction levels have been consistently high – with nearly 100% of respondents either satisfied or fully satisfied with all aspects (namely, the quality of (1) the guidance provided at the application stage, (2) the information contained in the call documentation, and (3) the ongoing guidance provided during implementation). However, the indicator on adherence to deadlines / timelines set out in the relevant grant agreements was only 91% in 2024 – the first time it fell below 100%.

Several of the projects that were supported by CCEI grants under the first call are subject to delays which, overall, has meant that progress towards the envisaged outputs has been slower than expected. In May 2025 only 13 projects have been completed, while 20 of the 42 call 1 projects have had or are having their duration extended, which has certainly contributed to the relatively slow progress with the OP indicators. It is worth noting that, although the application evaluation and grant signature process took a significant amount of time (251 days on average for call 1 in 2022, and 257 days for call 2 in 2024), it was completed within the “time to grant” deadline defined by DG TAXUD (275 days) in all cases except one²⁹. Thus, the main factor in the slower than expected implementation of the CCEI is the slow progress of many projects. In the questionnaire, national customs administrations were asked to assess the progress in implementing the CCEI grants awarded to their country so far; based on the responses, over half (53%) of projects have been progressing slower than expected.

The main reasons for these delays were external, i.e. not related to the design or management of the CCEI as such. In the majority of cases, problems with procurement procedures at the national level were to blame for the delays experienced by many projects. In their questionnaire responses, only 52% of national customs authorities agreed (and only half of these “strongly”) that procurement processes at national level function sufficiently well to allow the effective purchase of the equipment in question. In their responses and during interviews, customs authorities mentioned inter alia appeals or complaints from unsuccessful tenderers, a lack of bidders, uncertainty about if and how to exclude certain suppliers due to cybersecurity concerns, a lack of experts and human resources in the national procurement units, cumbersome procedures involving multiple permits and approvals, and budget freezes as factors that slowed down the procurement of the equipment in question. During interviews, manufacturers of customs control equipment also noted difficulties navigating different rules and procedures across EU MS, particularly for more sensitive technologies, and expressed a desire for clearer

²⁹ The preparation of four grant agreements in the second call are not taken into account in the calculation because the causes for the delays were outside the control of DG TAXUD.

guidance on topics like licensing requirements, cybersecurity standards, and how to get new technologies approved for CCEI funding.

Further to this, changes in the geopolitical situation – in particular the Russian full-scale invasion of Ukraine and resulting changes to traffic patterns and volumes at certain BCPs – led some MS to revisit and amend their procurement plans, and re-orient their CCEI projects, which also resulted in delays. On the other hand, supply-side issues do not appear to have played a significant role: 84% of respondents to the questionnaire for national customs authorities agreed that the required equipment is available on the market. In the relatively few cases where there seem to have been supply problems, bottlenecks may have been partly caused – according to some interviewees – by a simultaneous surge in demand for certain types of equipment from several MS due to the CCEI. However, there is no evidence to suggest that this has been a widespread or significant constraint for projects.

Progress made towards the envisaged results and impacts

Judging – let alone measuring quantitatively – the results and impacts of the CCEI is difficult given the early stage of implementation. In principle, results are measured via a series of indicators defined in the MEF, but all of these are subject to significant challenges and limitations as regards the completeness, quality and/or comparability of the underlying data.

Indicator RES 1.1 is intended to measure the specific results achieved by Member States through use of CCEI funded equipment, by comparing actual results with MS' commitments (with reference to baselines or targets, e.g. in terms of the number or value of seizures of different types of goods or substances, the number of controls conducted or the hit rate). The available data shows limited progress, with only between 10% and 21% (depending on the objective) of commitments achieved as of 2024. However, it needs to be re-emphasised that the quantity and quality of the data is poor due to significant reporting issues and inconsistencies, meaning the results should not be taken at face value.

Indicator RES 1.2 shows the proportion of national administrations who agree that the CCEI has contributed to adequate customs controls with equivalent results, based on the responses to an annual survey sent out by DG TAXUD. Agreement rates are consistently high, with between 95% and 100% of respondents agreeing or fully agreeing with the statements for each risk/threat category.

Indicator RES 1.3 attempts to measure the degree of adherence of BCPs' equipment to the common list of equipment that should be available per type of BCP. It is calculated by comparing the data provided by the MS regarding the equipment that is available and the main risks encountered, with targets for recommended equipment levels per BCP. The available data shows a small increase in the adherence rates (i.e. the proportion of BCPs that have the recommended equipment) for all types of BCPs from the baseline (2022) to 2024, but the rates remain low (between 9% and 17% for air, land, postal, rail and sea BCPs), far below the target set for 2024 (60%). These consistently low rates indicate that the targets as defined are likely to be unrealistic, i.e. overly ambitious, and not sufficiently taking into account specificities of individual BCPs and the prevalent risks.

Finally, indicator RES 1.4 is about the coverage of risks and threats, and more specifically, the extent to which BCPs have the necessary equipment available to mitigate identified financial and non-financial risks. Based on the available data for 2024, the coverage rates vary significantly between types of BCPs and risks. Overall, mobile BCPs generally demonstrate the highest coverage across the spectrum of risks and threats considered, suggesting greater effectiveness in risk mitigation compared to other types of BCP. However, again, the data limitations mean care needs to be taken when interpreting these results.

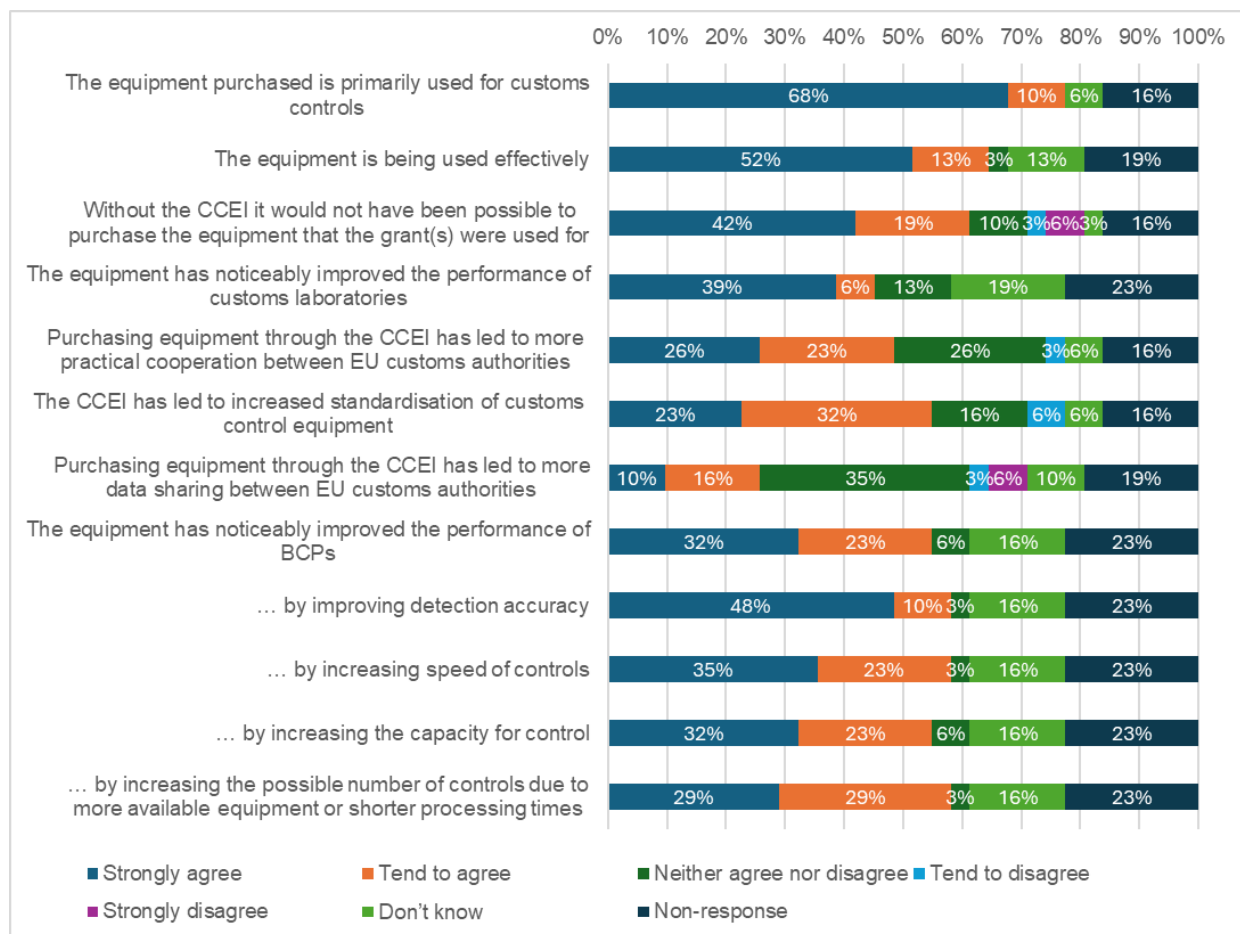
In the questionnaire, MS were asked to rate, based on their experience of the CCEI so far and expectations for the rest of the programming period to 2027, its likely contribution to its specific objective, which is to “contribute to adequate and equivalent results of customs controls through the transparent purchase, maintenance and upgrading of relevant and reliable state-of-the-art customs control equipment that is secure, safe and environmental-friendly, thereby helping the customs authorities act as one to protect the interests of the Union”. Nearly three quarters (74%) of respondents believed that the CCEI would make a “significant” contribution toward this objective; the remainder expected “some” contribution (16%) or responded “don’t know” (10%). Not a single respondents believed the CCEI would make only a “small” or no contribution at all.

National customs administrations were also asked a series of questions about the results achieved so far. The responses suggest that the equipment that has been purchased and deployed to date is being used effectively and as intended (i.e. primarily for customs controls). The majority of respondents reported that the equipment has already noticeably improved the performance of both BCPs (especially by improving detection accuracy, but also by increasing the speed of, capacity for and possible number of controls) and customs laboratories, although it is worth noting that there were a relatively high number of neutral or “don’t know” responses to these questions.

The data on relevant performance metrics that is available for the (few) projects that have been finalised shows the difficulties of quantitatively measuring and substantiating such improvements. For example, in the case of the Spanish BCP project, which was finalised in September 2024, the final report includes data on the number of controls, average process time, and % hit rate at the 16 BCPs that received the equipment. This shows that all of these metrics increased at most but not all BCPs. According to Spanish customs, the reasons for the variations can be manifold, and include changes in traffic volumes (e.g. significant increases in traffic can lead to longer average processing times). But it is also clear that some metrics are open to interpretation, in particular the hit rate, which can be influenced by many factors (including possible deviations of illicit traffic flows to other BCPs), but also that, when an old scanner is replaced with a newer one using similar technology, one would not necessarily expect to see a change in (all of) the metrics. Overall, in the Spanish case, interviewees felt that the lack of progress on certain indicators does not necessarily mean the equipment in question is not used effectively. Other national customs administrations responded along similar lines. Some also provided examples of how the CCEI had facilitated more effective and efficient controls that may not be picked up by relatively crude standardised metrics. For example, CCEI support enabled Sweden to acquire large, fixed scanners for certain key BCPs, and allowed it to redeploy existing mobile scanners to other BCPs, reportedly resulting in a more efficient overall distribution of resources; while Germany's acquisition of new substance detectors expedited control procedures at BCPs by reducing reliance on laboratory analyses.

On the other hand, there were lower levels of agreement that the CCEI has led to increased standardisation of equipment, more practical cooperation and/or data sharing between EU customs authorities. These are not aspects that have been the focus of projects and grants under the first call. On the issue of the lack of standardisation, several manufacturers of customs control equipment who were interviewed noted that different countries have varying specifications for similar equipment, which can lead to inefficiencies and increased costs. On the other hand, a few representatives of MS customs administrations (during interviews and the workshop) warned that, while a certain level of standardisation may be desirable for certain types of equipment, full-scale standardisation of, for example, scanning equipment across the EU would fail to take into account the sometimes varying national needs, and could imply security risks, as criminals could also adapt to and learn to take advantage of such common standards.

Figure 14: If your customs administration has already purchased and deployed customs control equipment using one or more CCEI grants, please provide your insight on the results achieved so far?



Source: Questionnaire responses from national customs administrations

Finally, it is worth considering the extent to which the CCEI has contributed to the procurement of modern / innovative equipment, and ensured the equipment is secure and safe (in terms of protection of data, cyber-resilience) and environmentally-friendly (incl. as regards the disposal of the replaced equipment). Taking these elements in turn, the questionnaire responses from national customs authorities suggest the situation varies somewhat:

- 91% agreed (incl. 52% “strongly”) that the CCEI encourages and facilitates the purchase of innovative, cutting-edge equipment.
- 87% agreed (incl. 58% “strongly”) that implementation of the CCEI takes due account of safety and environmental considerations.
- 77% agreed (incl. 42% “strongly”) that implementation of the CCEI takes due account of data protection, cyber-resilience and the security of the equipment purchased.
- However, only 67% agreed (incl. 35% “strongly”) that all aspects related to the equipment, including its security, could be covered by the current procurement rules.

This suggests that, while beneficiaries (i.e. MS customs) agree with the importance of all these aspects in principle, in practice they do not always play an (equally) important role in projects and procurements. The case studies and interviews show clearly that some but not all of the equipment procured is innovative or cutting-edge; environmental considerations are usually

considered but rarely as a decisive factor; and while cyber-security is generally taken very seriously, many customs authorities felt ill-equipped to effectively address concerns in this respect, namely with regard to a specific provider of scanning equipment and services.

Summary response

Overall, based on the evidence outlined previously, it is reasonable to conclude that the CCEI has been progressing towards its objectives relatively effectively. The activities implemented and outputs achieved to date are broadly in line with expectations. However, progress has been quite slow – partly because the first wave of grant agreements could not be signed until late 2022 (and the second until late 2024), but mainly because at least half of the projects under the first call have been progressing more slowly than expected by the national customs administrations that are responsible for them. The two main reasons for this are, most importantly, problems and delays experienced with national procurement processes and, in a few cases, changing equipment needs due to the evolving geopolitical context. As such, the slower than expected pace of progress is primarily a consequence of factors that are external to the CCEI, rather than of any significant design flaws of the CCEI, or of the way in which DG TAXUD has implemented the instrument.

In spite of the slow progress, there are encouraging early results, including the fact that, by end 2024, over 900 pieces of customs control equipment had been purchased, maintained or upgraded with CCEI co-funding, and are reportedly being used effectively and thus helping to improve the performance of the BCPs and customs laboratories that have received them. Once all projects under the first call are completed, this number is expected to more than double. Beneficiaries (i.e. the national customs administrations) are confident that, over time, the CCEI will make a significant contribution to the objective of achieving adequate and equivalent results of customs controls across the EU.

However, measuring this contribution quantitatively is and will continue be difficult given the shortcomings of the available indicators and data (see EQ 4), and the difficulty of establishing the exact additionality of the EU funding (see EQ 13).

EQ 2. *What were the factors driving or hindering progress towards the objectives and to what extent are they linked to the CCEI or to external factors (outside the remit of the CCEI)?*

The second question under the criterion of effectiveness focuses on the “why” progress has or has not been made, and on specific elements that may have contributed to this, namely the internal as well as external factors that have driven or hindered progress.

Extent to which internal factors (within the remit of the CCEI) are driving or hindering progress

The main internal factors that might have driven or hindered progress towards the achievement of the CCEI’s objectives include the overall design of the instrument (including the available budget, co-financing rate, and criteria that define what equipment is eligible for co-financing), the priorities defined in the MAWPs, the framework for implementing the CCEI and the way it has been managed by DG TAXUD, as well as the extent to which the allocation of the funds is informed by a rigorous assessment of needs, so as to ensure the most effective and efficient possible use of the EU’s resources.

As noted above, the CCEI budget has not hindered or constrained progress. The fact that the demand for co-financing has been so closely aligned with the supply suggests that the amount of funding available is sufficient to meet the Member States’ main needs (also see EQ 3).

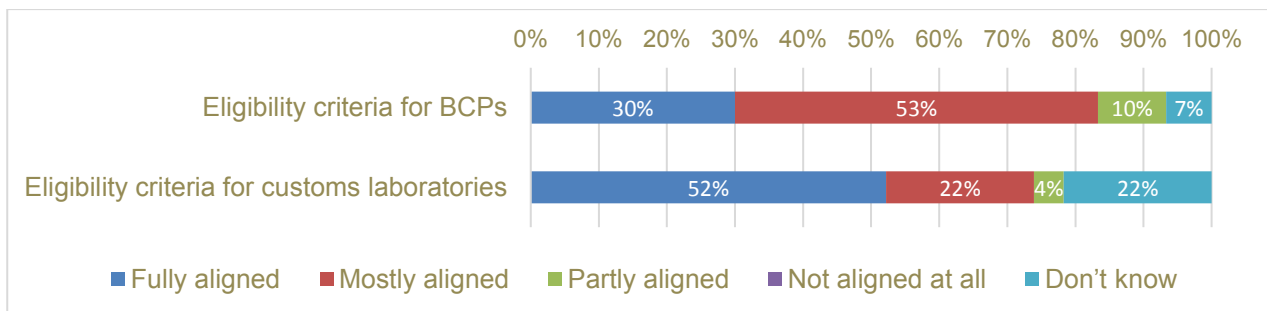
As for the co-financing rate (up to 80% of the total eligible costs of an action), several national customs administrations reported that obtaining the remaining 20% from national budgets can be

challenging, and has constrained the scope and level of ambition of some projects under the first and second calls. A few noted that a higher co-financing rate (potentially even 100%) would help to encourage Member States to procure more highly innovative, cutting-edge (and thus expensive) equipment. On the other hand, most acknowledged that the co-financing rate is already quite generous, and that expecting the EU to purchase equipment for BCPs and laboratories without *any* national contribution to the costs would be unrealistic (and potentially counterproductive).

National customs authorities had a mostly positive view on how the eligibility criteria align with their equipment needs and priorities. Based on their questionnaire responses, the level of alignment is especially high for laboratory equipment, but only 30% found the criteria for BCP equipment to be “fully” aligned with their needs. In their responses and during interviews, several Member States identified additional needs that are not or only partly eligible under the current criteria (though it should be noted that these can potentially be addressed via other EU programmes or funds; see EQ 12); the main gaps (ordered based on how frequently they were mentioned) were:

- Several Member States saw the ineligibility of costs associated with infrastructure and/or training as a constraint, since some equipment can only be used (effectively) if the relevant infrastructure (e.g. new lanes for lorries) and/or suitably qualified staff is available. A few interviewees believed that this might lead some administrations to prioritise relatively easy to use and install (in particular mobile or handheld) equipment when applying for CCEI funding.
- Several Member States applied (or would have liked to apply) for co-financing for IT equipment (including both hardware and software) that can facilitate the effective functioning of BCP equipment, in particular by enabling the connection between, integration, centralised control and/or analysis of equipment at, and data / images from, different BCPs. However, such equipment is not eligible, and the associated costs were therefore excluded from CCEI grants.
- A few Member States expressed disappointment that maintenance costs were not covered. While the CCEI can support not only the purchase and upgrading, but also the maintenance of equipment (and in a few instances this was the case), they reported that it had not been possible to obtain co-financing for the cost of maintaining (existing) BCP equipment under the second call.
- More generally, a few administrations argued that the eligibility criteria should be defined more flexibly and dynamically, to better allow for the inclusion of cutting-edge, innovative, potentially “game changing” technologies such as AI-powered systems or drones.

Figure 15: To what extent do the eligibility criteria align with the equipment needs and priorities of your administration?



The priorities defined in the MAWPs were deemed to be relevant by beneficiaries, and thus seem to have facilitated, and certainly not hindered, progress (for more on this, see EQ 8). At the same time, it is worth noting that these priorities were quite broad and all-encompassing, and as such have not necessarily contributed to channelling funding towards the most significant needs and gaps (as discussed in more detail below).

The framework for implementing the CCEI (including the process for defining the priorities, the work of the CCEI Coordination Group, and in particular the guidance provided by DG TAXUD) were viewed favourably by beneficiaries, and there are no indications that this has in any way hindered progress. In interviews, almost all national customs authorities were complimentary of the way the Commission manages the instrument, and especially of the hands-on support provided, and of the flexibility and pragmatism shown, by DG TAXUD project officers. However, they were more critical of the data model, with many expressing concerns and reservations about (some of) the data that applicants and grantees are required to provide to DG TAXUD. For further details on the data model, please see EQ 4. For more information about the efficiency of the CCEI framework as a whole, see EQ 5.

Finally, another internal factor that warrants a nuanced consideration is the way needs are assessed and used to determine the allocation of CCEI funding. As per the CCEI Regulation (recital 24), “implementation should be supported by assessments of needs” with the involvement of national customs authorities and based on a clear methodology; the Commission should use this information to determine the allocation of the funds to MS, taking into consideration factors including volumes of trade, relevant risks, and the administrative capacity of the customs authorities. To contribute to budgetary discipline, “the conditions for the prioritisation of grants should be clearly defined and based on such an assessment of needs”, driven by data on the available customs control equipment at each BCP, compared with a common list of equipment that should be available (Article 11(4)).

In the first instance, priorities are defined in each MAWP to address specific needs. The first (2021-2022) MAWP and call corresponded to a short-term approach dedicated to addressing the most urgent needs and raising customs control performance. To facilitate this, the priorities were kept very general and flexible, and MS were even allowed to apply for funding retroactively (i.e. include costs that had already been incurred). The second (2023-2024) MAWP and corresponding call were based on a “comprehensive mapping of the entire customs union to determine areas that need particular attention”, based on the data collected from MS in the first call. This showed that there were still urgent needs (in terms of missing and inadequate equipment), and meant it was “essential to identify concrete policy priorities to ensure targeted and efficient use of the available funds.” The priorities of the second call were narrowed to focus on more specific policy areas, namely (1) Safety and Security; (2) Mitigating international conflicts and crises; (3) e-Commerce; (4) Building Green Capabilities; and (5) Interoperability & Innovation. All five priorities were included within the “Added value” criterion against which proposals were evaluated, but only for the Safety and Security criteria did the evaluation criteria explicitly require “mandatory coverage of at least one of the relevant risks/threats.” Thus, while the second call did aim to introduce an increased focus on specific priorities informed by actual needs, it should be noted that most (if not all) types of eligible equipment could still be reasonably justified as addressing at least one, and potentially several of the five priorities. As such, it does not seem that these priorities significantly limited the types of equipment for which MS could apply for co-financing.

In the second instance, focusing the available funding at the most significant needs is meant to happen at the level of individual proposals and projects, by ensuring the evaluation of

applications duly considers the extent to which the equipment MS apply for responds to the main risks and needs. In theory, this is achieved via the award criteria, in particular “Relevance” and “Added value”, which should ensure that the projects that are most closely aligned with the identified needs achieve higher scores, and are thus prioritised for funding.

However, in the first call, in practice this prioritisation only happened to a very limited extent, for the following main reasons:

- Very broad priorities: As noted above, the first call was designed to help Member States address their most urgent equipment needs and raising performance overall. Therefore, national customs authorities were free to apply for any eligible equipment. The case studies show that different MS took different approaches, with some but not all of them focusing on the highest risks. Many projects included equipment that had to be replaced or added for different reasons (in several cases taking advantage of the retroactivity clause), but not necessarily for especially high-risk BCPs.
- No competition: As also noted previously, the first call was barely oversubscribed, meaning there was essentially no competition for funding, and hence no need for the Commission to prioritise proposals or work packages that were more aligned with key needs or risks over others that were less aligned. In essence, MS received co-financing for whatever equipment they chose to apply for, if it was eligible under the CCEI criteria.
- Issues with the data: The data on which needs assessments are to be based – including what equipment is currently available at each BCP, compared with what should ideally be available in view of traffic volumes and risk profiles – is to some extent fraught. As discussed elsewhere in this report (including EQ 4), MS frequently struggled to interpret and provide all of the data that was requested, leading to concerns about its comprehensiveness, reliability and comparability. In addition, the “ideal” list of equipment per BCP as defined (which forms the basis for the “adherence” indicator RES 1.3) appears overly ambitious, and unlikely to provide a clear steer as to which equipment is most needed to address key risks and gaps.

All in all, therefore, the envisaged data-driven approach to identifying needs and allocating funding could only be applied to a very limited extent under the first call. As a result, it is clear that, by and large, the first wave of projects responded primarily to national needs and priorities as identified by applicants (i.e. MS) themselves, with very little steer or corrective action at EU level to ensure they addressed the most pressing needs of the Customs Union as a whole.

In the second call, the situation changes somewhat. On the one hand, based on the data provided by MS as part of their applications for and reporting on projects under the first call (as well as data from selected other sources), DG TAXUD provided individual recommendations to each national customs administration regarding which types of equipment and risks they should prioritise under the second call. Draft recommendations were first sent in November 2023, and subsequently discussed in bilateral meetings, before a final version was sent to MS as a complement to the call documentation in December 2023. Under this call, the Relevance criterion made explicit reference to the individual recommendations, and applicants were asked to justify the needs based on these. At the same time, the minimum passing score for Relevance was increased by one point (from 5 to 6 out of 10) to try to emphasise the importance of this criterion. All applicants addressed the individual recommendations, some in a major, others in more minor ways. During interviews, several national customs administrations referred to and welcomed the recommendations, describing them as helpful and relevant.

As such, the recommendations provided an important use case for the data collected from MS, and, along with the more specific priorities, are likely to have had at least a modest effect in terms of making applications under the second call more responsive to key needs at the level of the Customs Union as a whole. Nonetheless, competition for funding was again limited (the call was only oversubscribed by around 8%), meaning the lion's share of applications could be funded, and only a limited level of selection and prioritisation was needed. As noted previously, no applications were rejected entirely, although some had their scope reduced with the exclusion of certain work packages.

Extent to which external factors (outside the remit of the CCEI) are driving or hindering progress

Based on the evidence collected, by far the most significant external factor that has hindered the progress made by CCEI projects to date are difficulties experienced with completing the procurement procedures at national level. As already mentioned under EQ 1, only 52% of national customs authorities who responded to the questionnaire agreed that procurement processes at national level function sufficiently well to allow the effective purchase of the equipment in question, with many citing problems with appeals or complaints from unsuccessful tenderers, a lack of bidders, uncertainty about if and how to exclude certain suppliers due to cybersecurity concerns, a lack of experts and human resources in the national procurement units, cumbersome procedures involving multiple permits and approvals, and budget freezes as factors that slowed down the procurement of the equipment in question.

The interviews and case studies helped to shed further light on how and why so many projects under the first call have been affected by procurement issues. Six of the ten projects that were the subject of case studies (the BCP projects of Belgium, Croatia, Estonia, the Netherlands, Poland and Romania) have experienced or are experiencing delays because they were unable to complete certain procurement procedures as planned. The specific reasons for this varied from case to case, and included, according to interviewees, instances where no (compliant) tenders were received for certain lots; appeals from unsuccessful bidders; the need to re-launch procedures due to various reasons including tenderer errors; delays caused by bureaucratic procedures related to permits and land ownership; and backlogs created by high volumes of CCEI-supported procurement procedures, and in some cases others that had been delayed by the COVID-19 pandemic, which exceeded the capacity of the customs officials and units in question. In interviews, several officials from other (non-case study) MS mentioned having encountered similar issues. It appears that these were especially prevalent in larger projects that sought to procure high volumes of equipment, and in projects that targeted equipment that was new and/or innovative for the customs administrations in question, and with which they therefore had no or only limited procurement experience.

A few MS also mentioned having encountered supply issues, including extended delivery timelines for equipment due to a supply crunch at a particular point in time, and rising prices for certain types of equipment.

In three of the ten case studies (Belgium, Estonia and Netherlands), as well as in several other projects, cybersecurity concerns played a significant role. Specifically, there have been and continue to be significant concerns that a specific provider of scanning equipment and services could facilitate the leakage of sensitive data to unauthorised users. This company has been a preferred supplier to many EU MS, in large part because it offers very competitive prices, but in recent years, as concerns have emerged and intensified, there have increasingly been attempts to exclude it from procurement procedures for sensitive equipment, and to ensure it does not benefit from EU (incl. CCEI) funding. However, several MS have reported difficulties with achieving this in practice, with national legislation reportedly offering different, more or less effective,

ways of addressing these concerns. At EU level, security and cybersecurity protection of the equipment funded was reaffirmed in 2023 through the work carried out under the CCEI Coordination Group, and further clarified in the 2023-2024 CCEI MAWP and in the second call for proposals, which provided additional guidance to increase the stringency of security and cybersecurity requirements, and made allowance for the granting authority to request substantiating documentation of compliance with reference to key security requirements (including the NIS2 Directive³⁰ and security guidance issued by the Commission). Nonetheless, some national customs administrations reported a continued lack legal certainty in this area. In certain countries, procurement processes had to be cancelled, re-launched and/or specifically re-designed to avoid results deemed incompatible with national security priorities.

During interviews, manufacturers of customs control equipment also noted difficulties navigating different rules and procedures across EU MS, particularly for more sensitive technologies, and expressed a desire for clearer guidance on topics like licensing requirements, cybersecurity standards, and how to get new technologies approved for CCEI funding. Several European manufacturers expressed concern about competition from non-EU (particularly Asian) suppliers based primarily on price, and expressed a desire for procurement criteria to give more weight to factors like security, quality, and European content, rather than focusing primarily on price. Some also suggested incentives or preferences for European-based manufacturers to support EU strategic autonomy in this sector.

Another geopolitical factor that has affected the implementation of the CCEI is the Russian full-scale invasion of Ukraine, which has significantly influenced the customs control equipment procurement strategies and priorities of certain MS, especially those that share a border with either Ukraine or Russia. In response, the MAWP 2023-2024 included the priority “Mitigating international conflicts and crises”, with a specific emphasis on equipping BCPs to correctly implement the sanctions imposed against Russia under elevated customs security risks, as well as performing the necessary controls to enable the flow of trade through the EU-Ukraine Solidarity Lanes. But some projects under the first MAWP and call were also affected by these factors; for example, the closure of Finland’s Eastern border necessitated substantial changes to its BCP project, and led the Finnish customs authority to re-focus the equipment away from land BCPs bordering Russia and Norway, and towards ports in Western Finland; these changes were the main reason for the delayed implementation of the project. Similarly, Poland reported that the purchase of equipment for a specific BCP was abandoned due to the combined effects of the COVID-19 pandemic and the Russian invasion of Ukraine. On the other hand, some countries including Bulgaria and Slovakia reported that the CCEI had already helped them address challenges resulting from the war.

As noted above, the combination of these external factors made it necessary to amend a significant number of grants agreements to extend the project duration. During interviews, national customs authorities provided mostly positive feedback on how DG TAXUD has handled amendments, variably describing its approach as flexible, pragmatic and proactive.

Summary response

Several factors have had a positive or negative effect on the progress made by the CCEI towards its objectives to date. A number of external factors have been responsible for the delayed implementation of many projects, most important among them challenges with national procurement rules and procedures; many processes encountered problems that meant they could not be completed on time. Capacity constraints among national customs administrations were a

³⁰ Directive (EU) 2022/2555 on measures for a high common level of cybersecurity across the Union

contributing factor to this, especially for larger and/or more complex projects. In a number of cases, cybersecurity concerns also played an important role, while in others, projects underwent significant changes due to evolving geopolitical challenges and priorities, mainly resulting from the Russian full-scale invasion of Ukraine in 2022 and its aftermath. In a few cases, supply-side issues (temporary unavailability and/or rising prices of certain types of equipment) also affected procurement processes. Between them, these external factors have been the main reason for the slower than expected progress of many projects under the first call.

By and large, internal factors (namely the design of the instrument, the available budget, co-financing rate, and eligibility criteria, the priorities defined in the MAWPs, the framework for implementing the CCEI and the way it has been managed by DG TAXUD) have contributed to driving rather than hindering progress. There is no evidence to suggest that any of these elements have acted as a significant constraint to the implementation of the CCEI, with beneficiaries providing almost entirely positive feedback on all of them.

Nonetheless, a combination of both internal and external factors have meant that the extent to which the allocation of the funds has been effectively informed by a rigorous assessment of needs has been limited under the first and, to a slightly lesser extent, second call. There is no doubt that the equipment that has been supported by the CCEI to date is both eligible for co-financing under the applicable rules, and relevant to address the overarching objectives. However, it responds more to needs as identified by individual MS, which may not always coincide with the *most* significant gaps and needs at EU level. Therefore, it is not entirely clear whether the CCEI as implemented to date ensures the most effective and efficient possible use of resources.

EQ 3. *To what extent is the CCEI used by the Member States and what are the factors that encourage or hinder its use?*

The response to this question considers the level of demand from Member States for CCEI funding, and the main reasons that encourage or hinder their use of the instrument.

Level of demand for CCEI funding

All 27 MS have now used and/or are using CCEI funding. In response to the first call, 24 MS applied for and were awarded funding. All three MS that did not apply under the first call (Denmark, Greece and Malta) applied (successfully) under the second call. By contrast, two MS that were active under the first call chose not to apply under the second (Estonia and Portugal). Under each call, the majority of MS applied for funding for equipment for both BCPs and laboratories, but a few went only for BCPs.

Table 10: Number of EU Member States that applied for CCEI funding, per call

	First call (2021-2022)	Second call (2023-2024)
For BCPs and laboratories	18	22
Only for BCPs	6	3
Only for customs laboratories	0	0
Total	24	25

The amount of co-financing per MS was capped at 15% of the topic budget, meaning that, under the first call, each MS could have applied for up to EUR 40.7 million of co-financing (EUR 32.5 million for BCPs, and EUR 8.1 million for laboratories). In practice, the vast majority of MS chose to apply for significantly less – around EUR 11.4 million on average under the first call,

with half of the proposals (21, including all except three of the laboratories projects) requesting co-funding of less than EUR 2 million, and only four (all BCP projects) requesting more than EUR 20 million. The table below shows the aggregate amounts that were available and applied for under each call. It shows that, in both cases, the total demand for funding was only slightly higher than the supply: the first call was oversubscribed by less than 1%, and the second by 8%. It should also be noted that 80% of the budget of each call was earmarked for BCPs, and 20% for Labs. In view of this, under both calls the demand for support for BCP equipment was actually a little higher than the supply (by 14% and 17%, respectively), while the demand for Lab equipment was significantly lower (by 52% and 28%, respectively). In the event, the unneeded funding for Labs was re-allocated to meet the demand from BCPs.

Table 11: Aggregated demand for CCEI co-financing per call

	Amounts available and applied for (EUR)	
	First call (2021-2022)	Second call (2023-2024)
Available budget for BCPs	217,211,200	227,170,400
<i>Applied for BCPs by MS</i>	<i>247,193,266</i>	<i>266,382,600</i>
Available budget for laboratories	54,302,800	56,792,600
<i>Applied for laboratories by MS</i>	<i>26,282,097</i>	<i>40,726,128</i>
Available budget – Total	271,514,000	283,963,000
<i>Applied for by MS – Total</i>	<i>273,475,363</i>	<i>307,108,728</i>

Reasons that encourage or hinder MS use of CCEI

In their questionnaire responses and during interviews, the vast majority of national customs administrations emphasised their conviction that there is a clear need to ensure all MS have the equipment needed to ensure adequate and equivalent results of customs controls throughout the Customs Union, and that the objectives and priorities of the CCEI were and continue to be relevant (for further details see EQs 8 and 9 below). Thus, the main reason that encourages MS’ use of the instrument is their desire to obtain financial support that enables them to procure additional and/or upgrade existing equipment, and thereby to enhance the performance of their BCPs and/or customs laboratories.

At the same time, MS took different approaches to their applications, and this is reflected in the amount of co-financing they requested. In response to the first call, some submitted highly ambitious projects that clearly went above and beyond what they would have been able to procure without CCEI support. In at least one case, this was done in the expectation that they were unlikely to be awarded co-financing for all of the equipment included in their applications (which turned out to be false due to the limited aggregate demand). Other MS opted for a more cautious approach; for various reasons, including a lack of familiarity with the instrument, and uncertainty about their ability to secure national funds beyond what had already been approved for existing plans to purchase customs control equipment, they chose to only apply for relatively small amounts of EU co-financing. However, in several cases (e.g. Germany, Czechia, Luxembourg), MS became more proactive and ambitious in the second call, applying for higher amounts for more expensive equipment that, according to interviewees, would have been challenging to finance solely through national budgets. On the other hand, it appears likely that difficulties and/or delays encountered in projects under the first call appear to have led some MS (e.g. Cyprus, Slovenia) to scale back their ambitions under the second call, or even not participate at all.

The three MS that did not participate in the first call provided broadly similar reasons for this – namely, a lack of preparedness within the customs administration to deal with the requirements of preparing and submitting a proposal within the time available, and/or the absence of a comprehensive needs assessment that could be used to determine what additional equipment should be procured. In one case (Denmark), there was reportedly also a sense within the administration that the country did not really need additional resources for customs control equipment. As noted above, all three MS did engage with the second call, based on a more detailed understanding of their needs and gaps that they had developed in the meantime, and/or a re-assessment of their priorities.

The two MS that did not participate in the second call did so because of the significant delays in procuring and installing equipment from the first call, which led them to decide they lacked the internal resources to embark on additional projects for the time being.

Summary response

The CCEI has now been / is being used by all 27 MS, which confirms it is seen as a valuable and relevant instrument by customs administrations across the EU. On the other hand, the fact that the level of demand under both calls to date has been relatively low (only marginally higher than the available budget) shows that the absorption capacity of MS is not unlimited. The main factors that hinder the more intensive use of the CCEI relate to (1) the ability to secure sufficient national co-funding, in particular for (more expensive / innovative) equipment that is not covered by “business as usual” purchase, upgrade and replacement strategies and plans, and (2) the challenges, difficulties and delays experienced with national procurement procedures, which can make MS reluctant to be more ambitious and/or faster in their endeavours to add to and modernise their equipment.

EQ 4. *What factors are limiting the use of the CCEI data model and what is necessary to use it to its full potential?*

The CCEI data model was designed to facilitate the implementation of the Instrument. This section focuses on the hindering factors which have limited the ability of the CCEI data model to be fully leveraged by DG TAXUD. In line with the CCEI Regulation, the data model was designed to serve two key functions. The first was to identify CCE gaps and needs and concomitantly to target CCEI funding in line with recital 24. Another key function of the data model is to support the monitoring of the Instrument.

However, the extent to which the data model was used to steer CCEI funding is difficult to assess. While it does seem that, on occasion, the model was used to target funding the gathered evidence remains sparse and anecdotal. Given the lack of material over-subscription to the Instrument during the first but also second call, it seems that there was no pressing need exerted on DG TAXUD to target funding as there was enough CCEI funding to meet all the (CCE) needs identified by customs authorities.

Beyond the lack of competing pressure on the CCEI funding pot, four key limiting factors were identified preventing the overall effectiveness of the model. Overall, these factors can be classified in two broad categories: (i) factors that are external (i.e. exogenous) to the model and therefore not within DG TAXUD’s direct sphere of control and (ii) factors that are internal (i.e. endogenous) and linked to the design of the model. These limiting factors are set out below at a high level and subsequently analysed in more detail in the ensuing section.

Exogenous factors:

- Administrative burden

- Lack of understanding and buy-in from customs authorities
- Poor data completeness and accuracy

Endogenous factor:

- Dynamic and unpredictable nature of customs threats (risk-based approach)

The analysis below discusses the above factors in more detail. The judgement criteria are substantively addressed in the overall summary response provided at the end of this section.

Administrative burden

One of the key issues linked to the implementation of the data model has been the administrative burden it has created on customs authorities. Indeed, interview feedback have consistently highlighted that a recurring issue for many customs authorities at application stage was filling out the data collection sheets to feed into the data model. More specifically, interview feedback from most customs authorities suggests that this process involved duplicating existing information and/or required significant manual effort, diverting resources from core operational tasks. In addition, at a technical level, several customs authorities noted that completing the data tables was not only time-consuming but also not aligned with national procedures and frameworks. In practice, this meant that some of the requested information was not readily available from existing national and regional databases and that additional and novel data collection was needed.

Linked to the above, several authorities also reported resource constraints as further compounding the administrative burden created by the data model. For example, the data requirements linked to the model led to a heavy workload placed, in some cases, on a single customs coordinator without dedicated staff. Overall, while all interviewed parties expressed a generally positive view of the CCEI and praised the support from CCEI personnel at the Commission, the application process received more criticism than praise primarily linked to the administrative burden it involved, to which the information requirements linked to the data model contributed significantly.

In addition, reporting requirements, which are also important for the effective (continued) implementation of the data model, also seem to have contributed to the sustained burden across several CCEI projects. Several interviewees reported that the Excel component of reporting was perceived as burdensome to collect information for and to complete. Several delays have been witnessed in the submission of annual progress reports by grant recipients. Receiving data in a timely manner has not been the case thus far for a large number of projects.

Last, the lack of centralisation of data collection within some MS and the diverging frameworks between some MS have also been a driver of the administrative burden linked to the CCEI's data model. Indeed, several MS's customs authorities rely on their regional offices to provide the data needed for the model and lack a centralised database from which data could be extracted more seamlessly. As a result, as reported by several interviewees significant burden was put on CCEI project coordinators (sometimes with limited resources themselves as outlined above) as they had to disseminate and coordinate inputs from several regional customs offices and hubs, which in turn contributed to the patchy data gathered at application stage and the timeliness of reporting during the implementation stage.

Lack of understanding and buy-in from customs authority

Another key issue that emerged from the research lies in the lack of understanding linked to some components of the data model. More specifically, a lack of understanding regarding the definitions and classifications of CCE was reported by several CCEI beneficiaries. For instance, the list of eligible equipment for customs labs was described as having caused some confusion

by the Austrian customs authority despite alignment efforts conducted as part of the CCEI Coordination Group. In addition, several customs authorities reported that the spreadsheets (Part B of the application template) were not user-friendly and difficult to navigate.

A further issue was a lack of understanding on the part of some MS regarding the metrics and indicators embedded within the data model. Specifically, several customs authorities reported these are unclear, ill-defined and open to interpretation. In addition, the risk categorisation and ranking was also reported by some customs authorities as not having been clear and easy to make sense of, therefore suggesting that a degree of erroneous inputting may be present and that the results from the risk model may not be completely reflective of the risk levels at BCPs and Labs.

Moreover, though not applicable to all MS, for some there also seems to be a lack of understanding of what role and purpose the data model serves. This became evident during discussions held during the validation workshop, which revealed that beyond the administrative burden required to operationalise the data model, there was a lack of understanding among some customs authority representatives on what the model was used for. It seems reasonable to assume that this lack of understanding and therefore buy-in from customs authorities may have led to a sub-optimal engagement with the data model and further exacerbated the issues linked to administrative capacity set out above.

Poor data completeness and accuracy

As a result of the above issues, there have been inconsistent and poor levels of completeness and quality of the data received by DG TAXUD to operationalise the data model. This was the fundamental hurdle by far to successfully implementing and leveraging the data model as envisaged. The review of the applications submitted for the case study projects aligns with the feedback from customs authorities in terms of the difficulty in providing complete and accurate data.

The 10 grant agreements selected as part of the case studies were reviewed with a view to informing an assessment of data completeness and quality at proposal stage. While this review is not systematic, it does provide some insights as to what types of data have been proving particularly problematic to collect. In addition, it should be noted that it is difficult to assess the quality of the data using objective means in the absence of audits of BCPs and labs. Therefore, interview feedback was used to assess this aspect, and triangulating feedback from both DG TAXUD and the beneficiaries allows for a somewhat balanced assessment.

Table 12: Assessment of the data quality and completeness gathered at application stage

Type of data	Excel Sheet #	RAG rating	Overview of data completeness and quality
Inventory data	3	High	Overall, this was found to be fairly exhaustive in the reviewed applications. Breakdowns at BCP and lab-level were consistently provided. In terms of accuracy, feedback from customs authorities also confirmed that the mapping they provided is on the whole comprehensive and reflective of the situation on the ground at BCPs and labs.
Traffic data	4	Low	Overall, several datapoints were not reported in the reviewed applications. This includes traffic volumes at several BCPs. The feedback gathered on quality was mixed.
Risk assessment	5	Low	As for traffic data, the data reported by customs authorities was found to be inconsistent in terms of completeness across the 10 applications reviewed. More specially, risk ratings were left blank for several risk

Type of data	Excel Sheet #	RAG rating	Overview of data completeness and quality
			<p>categories and BCPs.</p> <p>In terms of quality, as noted further down in this section, the ranking of threats suffers from important limitations linked to the dynamic nature of customs threats. In addition, interview feedback suggests that some CCEI applicants may not have fully understood the framework for the risk assessment, which may have had an impact on the quality of the inputted data.</p>

Dynamic and unpredictable nature of customs threats (risk-based approach)

In addition, there are intrinsic limitations with the risk assessment linked to the dynamic and unpredictable nature of customs threats. Several customs authorities reported that carrying out the risk assessment (i.e. identifying and ranking the risks on sheet 5) was challenging because of the dynamic nature of threats faced at BCPs. Recent changes in geopolitics have highlighted the shifting nature of trade flows. For example, the sanctions imposed on Russia and the humanitarian and military aid being channelled to Ukraine have changed the nature of goods transiting via certain areas of the EU’s external border. Another example of this is the humanitarian corridor put in place to provide aid to Gaza following Israel’s special operation in October 2023. Linked to this, Cyprus’ customs authority reported that their customs needs changed as there was an increase in sea-borne cargo at their BCPs, which led in turn to a change in their CCEI needs, and which itself led to an amendment request being made to their CCEI grant agreement.

As such, there may be a need to complement the risk-based approach underpinning the data model by embracing a more standardised coverage of equipment for some BCPs. This could allow the data model and underlying logic to aim for more well-rounded BCPs with a versatile set of equipment to allow customs authorities to be better positioned to respond to unknown threats swiftly.

Summary response

Data quality, reliability and completeness is found to be low for major parts of the data model (see also EQ 7). Overall, the evidence suggests that the data model has not been fully leveraged thus far in the implementation of the Instrument. This is due to a combination of endogenous and exogenous factors, not least the lack of adequate data required to operationalise the model by DG TAXUD. With respect to the extent to which the data model has been used to target funding, the evidence is scant. However, regarding the extent to which the data model has allowed DG TAXUD to acquire a better understanding of Customs Union needs, arguably the implementation of the data model via the CCEI can be seen as a step in the right direction. As outlined above, the inventory data appears to be robust and has provided DG TAXUD with a first mapping of the inventory of CCEI at national and regional level. No such mapping exercise had ever been conducted before the CCEI. Despite the reported and discussed issues with the rest of the data, the inventory data alongside this first data collection effort by DG TAXUD and customs authorities appears to be a step in the right direction towards more standardised data collection and reporting practices across the EU-27. Looking ahead, however, there may be a need for simplification (see response to EQ 7) and adopting more user-friendly tools to further facilitate data collection and to make the CCEI data model more fit for its purpose.

Efficiency

As per the Better Regulation Guidelines, the efficiency evaluation criterion is concerned with assessing the extent to which European interventions provide value-for-money and make the most optimal use of EU funding. In the case of the CCEI interim evaluation, as noted previously, it is too early to comprehensively and robustly assess the benefits, much less to attempt to quantify and express these in monetary terms (which would be needed for a full cost-benefit analysis). Instead, the focus of the assessment of efficiency focuses mostly on the CCEI's operational efficiency; that is how efficiently the different components and stages of the process and overall implementation framework have been delivered to date. Nevertheless, in order to provide some degree of quantification, estimates of the administrative burden placed by the CCEI on its beneficiaries are also provided (see EQ 6).

As per the evaluation matrix below, the ensuing analysis assesses the extent to which the processes through which the CCEI have been implemented and managed have been efficient, drawing on stakeholder feedback primarily, and monitoring data to a lesser extent (EQ 5). As noted above, the analysis also aims to estimate the direct costs incurred by customs authorities taking part in the CCEI and whether these are justified in light of the results achieved thus far but also those expected to be achieved in the more medium term (EQ 6). Last, the analysis considers potential avenues for simplification, mostly related to the data model and reporting requirements as these two interrelated elements have been identified as being the main drivers of the administrative burden linked to the Instrument.

Table 13: Evaluation matrix for Efficiency

Evaluation questions	Judgment criteria	Indicators	Data sources
5. To what extent is the framework for managing and implementing the instrument efficient in order to achieve its objectives?	Extent to which MS are satisfied with the framework for managing and implementing the CCEI	Satisfaction of customs administrations with the efficiency of the implementation process (OP 1.3)	<ul style="list-style-type: none"> CCEI monitoring data
		Stakeholder feedback on the efficiency of specific CCEI processes and tools (incl. priority-setting and programming; submitting and evaluating applications; contracting, grant management and amendment, and payments; reporting, data management, monitoring and evaluation)	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews Workshop
		Examples of inefficiencies and their root causes encountered on specific CCEI projects	<ul style="list-style-type: none"> In-depth case studies
	Extent to which procedural and management tasks are carried out in a timely manner	Avg. time to inform, time to signature, and time to grant	<ul style="list-style-type: none"> CCEI monitoring data
		Stakeholder feedback on the timeliness of specific CCEI processes and tools (as above)	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews Workshop
		Examples of delays and their root causes encountered on specific CCEI projects	<ul style="list-style-type: none"> In-depth case studies
6. To what extent are the costs (incl. direct & indirect costs, e.g. administrative burden) of the intervention justified , given the effects it has achieved? Could the intervention have been done in a more efficient way and if so,	Extent to which the costs of implementing the CCEI are proportionate to the benefits achieved (cp. EQ 1 above)	Direct financial costs (CCEI grants awarded)	<ul style="list-style-type: none"> CCEI monitoring data
		Direct compliance costs, in particular administrative costs linked to application, grant management and reporting processes	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews

Evaluation questions	Judgment criteria	Indicators	Data sources
how?			<ul style="list-style-type: none"> In-depth case studies
		Indirect costs (if any), such as potentially transaction (e.g. as a result of having to renegotiate contracts with existing suppliers of CCEI) or opportunity costs	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews In-depth case studies
7. What is the simplification potential of the intervention? How could procedures be optimised? How can the monitoring and reporting be improved?	Extent to which aspects of the CCEI framework and processes that imply unnecessary / unjustified complexity, costs, burdens and/or delays could be improved	Suggestions from national customs authorities and other stakeholders for further improvements and simplifications	<ul style="list-style-type: none"> MS questionnaire responses Stakeholder interviews In-depth case studies
		Assessment of the likely benefits and drawbacks of potential changes (drawing, where possible, on experiences of similar programmes / instruments)	<ul style="list-style-type: none"> Document review Stakeholder interviews Workshop

EQ 5. *To what extent is the framework for managing and implementing the instrument efficient in order to achieve its objectives?*

To assess this evaluation question, the analysis focuses first (i) on the framework and processes used to deliver the CCEI, incl. the application stage, grant signing and amendment process, reporting mechanisms and overall delivery of the Instrument. Second (ii), the analysis looks into the envisaged and actual timescales for the implementation of the Instrument and, in particular, the delays that have been accrued since the CCEI has been launched.

Extent to which MS are satisfied with the framework for managing and implementing the CCEI

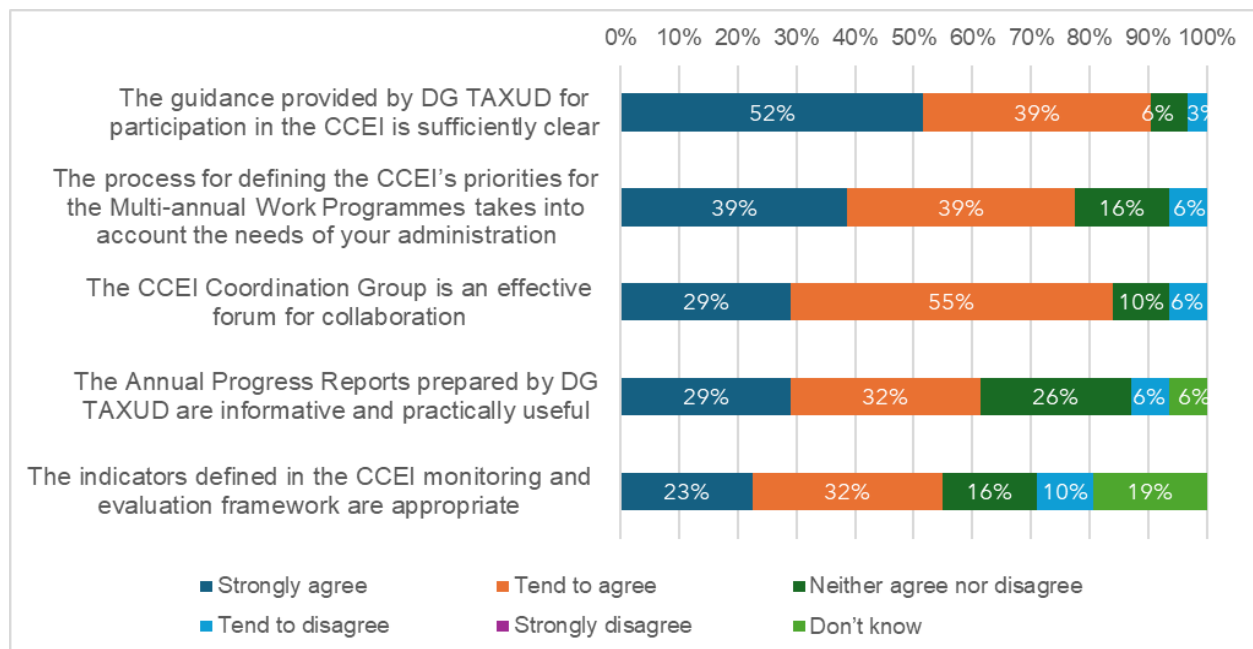
Overall, the majority of customs authorities (i.e. CCEI beneficiaries) have been pleased with the way the Instrument has been managed. More specifically, the majority of respondents to the questionnaire reported that the guidance provided by DG TAXUD to participate in the CCEI was sufficiently clear, with 52% strongly agreeing and 39% tending to agree (see figure below). No respondent reported disagreeing with the statement that the ‘guidance was clear and useful’. This was also further confirmed by interview feedback where several customs authorities reported that beyond the guidance provided by DG TAXUD, the communication and ad-hoc support provided by the Commission was particularly well appreciated. Moreover, several interviewed customs authorities stated that plenty of notice was given to customs authorities to ensure they were ready to respond to CCEI calls in time.

The process for managing / delivering the CCEI is examined in more detail below via a procedural lens.

While the outputs of the priority setting process were reported as broadly aligned with customs authorities’ needs, the process through which these were defined seemed to have generated mixed sentiment in terms of the extent to which it took into account the needs of customs administrations. Indeed, data collected by the questionnaire revealed that 39% of respondents thought the process took their needs into account, while another 39% indicated that they only tended to agree with this statement. Also worth noting, the CCEI Coordination Group, i.e. the forum via which inter alia CCEI priorities were set also generated slightly less positive feedback, with 55% of respondents tending to agree with the statement the Coordination Group is an

effective forum for collaboration. The figure below provides an overview of the views and perspectives shared by customs authorities on the key elements associated with the process and framework to deliver the Instrument.

Figure 16: Please consider your level of agreement with the following statements of the management structure and processes of the CCEI



Source: Questionnaire responses from national customs administrations

Second, with respect to the CCEI's application process, proposals were evaluated via a three-step process as follows:

1. Individual evaluations by assessors;
2. Consensus meetings with three evaluators and a moderator; and
3. Final panel meeting involving DG TAXUD to ensure consistent application of the rules, with some flexibility for score adjustments subject to agreement of the evaluation committee.

Overall, evaluators from other Commission services and the CCEI beneficiaries described the process as working well from a procedural perspective. However, a number of issues linked to the assessment process were nevertheless noted:

- Exclusion of infrastructure costs: it was reported by stakeholders involved in the assessment process that a key challenge was distinguishing between the infrastructure component and the equipment, especially in cases like high-energy scanners. The separation between these two categories is not always clear-cut, as they often overlap in terms of function and procurement needs. Additionally, it was also reported that a lack of adequate guidance further compounded this issue.
- Assessment of Lab proposals: some stakeholders involved in the assessment process also noted that the highly specific and technical nature of these proposals was challenging, requiring expertise beyond the assessor's expertise in some cases.
- Length of the assessment process: While some customs officials reported that the time to review applications was lengthy on occasion, they also conceded that it was understandable that CCEI assessors needed time to review applications, particularly for

large-scale projects involving a large number and type of instrument as well as significant EU funding (see next sub-section for a more detailed analysis of timescales for the application process).

Despite the relatively positive views on the application process from a procedural perspective, a majority of stakeholders reported being dissatisfied with the significant administrative burden linked to the preparation and submission of CCEI applications. As one stakeholder noted: *“From what we’ve learned from other countries, the reporting process can be quite challenging. If we find that we’re going to spend too much time on that, we may reconsider participating again, especially given our limited budget. This experience is important for us to evaluate whether we want to stay involved in the future.”* This issue is further discussed under the next evaluation question (EQ 6) and under EQ 4 on the data model.

Concerning the amendment process, as was shown in the case studies, a large number of amendments were requested by grant recipients concerning both the duration of their projects and the equipment in scope. The majority of amendments involve requesting extensions to project durations which pushes out the project completion date to 2026 or 2027.

This amendment process was reported to be lengthy by some stakeholders, however, for the most part the delays seemed to have originated at the national level rather than at the European level. Overall, the majority of interviewed customs authorities reported having been satisfied with the flexibility provided by the amendment process notwithstanding the protracted nature of the process in some cases.

Last, with respect to the reporting process, similar to the application process and as mentioned under EQ 4, there have in some cases been significant delays in submitting progress reports (this is evidenced in the case studies). While the key driver of this is the administrative burden and lack of capacity within customs authorities, this is further exacerbated by the (perceived) lack of rigid and binding rules linked to reporting requirements. Indeed, although in principle, customs authorities are obliged to submit reports annually throughout the duration of their projects, there are no direct consequences for them if they fail to do so. The only report that is linked to a payment is the final report that has to be submitted at project completion. While it is clear that the lack of capacity and high burden associated with data collection are the main obstacles, the lack of stricter measures may have also contributed to a lesser degree of efficiency with regard to the timely and adequate collection of reporting data needed to monitor the CCEI.

Extent to which procedural and management tasks are carried out in a timely manner

While some customs authorities reported that the time taken to review applications was lengthy on some occasions, overall the time taken was under the maximum amount of foreseen. Under the first call, the average "time to inform" (TTI) – the time taken to notify beneficiaries about the outcome of their proposal – was 125 days after the Call closing date. This is 58 days ahead of DG TAXUD’s target. Furthermore, the average “time to sign” was 124 days, while the average "time to grant" (TTG) was 251 days from the call closing, which is 24 days before the target.

The second call, similarly to the first one, proceeded mostly on schedule, albeit with some delays. More specifically, the average "time to inform" (TTI) was 124 days after the second call’s closing date, 59 days ahead of the DG TAXUD target. The average "time to sign" (TTS) was 133 days, not taking into account four grants that experienced some additional delays for various reasons outside the control of DG TAXUD. The average "time to grant" (TTG) was 257 days from the call closing, 18 days ahead of the target – also without the above mentioned four grants.

With respect to the effective implementation of CCEI projects, overall, the CCEI has suffered from important delays in both of its first calls. However, most of these delays have been driven

by issues at the national level, particularly public procurement as noted under EQ 1. The ensuing analysis provides further insights into the timescales to date drawing on the metrics listed in the evaluation matrix for this criterion.

In the first call project durations initially set at the time of signature ranged from 12 to 36 months. However, significant delays have been witnessed in several first call projects which led to amendments of twenty grants extending their durations by up to 30 months. As of May 2025, 13 projects—perhaps not coincidentally, including the five smallest grants—have been completed. Most of the remaining projects (14) are now expected to finish in 2025, while 11 are projected to conclude in 2026 and four in 2027.

In the second call, the maximum project duration was also 36 months. 18 grants started by the end of 2024, while the remaining are set to start in 2025.

Summary response

The framework for managing and implementing the CCEI has been generally efficient, with most customs authorities satisfied with the guidance, communication, and support provided by DG TAXUD. Over 90% of beneficiaries found the guidance clear and useful, and the application evaluation process was viewed as procedurally effective. However, some concerns were raised, particularly the high administrative burden of preparing applications.

While the amendment process was appreciated for its flexibility, it was often lengthy, primarily due to delays at the national level. Reporting delays were also significant, driven by administrative burdens and limited capacity within customs authorities, exacerbated by reporting requirements during projects that were not perceived as binding by all beneficiaries. Timeliness in procedural tasks, such as application reviews and grant approvals, were generally under the defined targets, though some delays were noted in the second call. Project implementation, however, has been facing substantial delays, with many first-call projects requiring extensions of 6 to 14 months, pushing completion dates to 2025–2027, largely due to national-level procurement issues.

Overall, the CCEI's management framework has been effective, but challenges such as administrative burdens, reporting delays, and national-level inefficiencies need addressing to enhance efficiency further. Streamlining processes and reducing administrative complexity could strengthen the framework and better achieve the CCEI's objectives. The scope for simplification is addressed under EQ 7.

EQ 6. *To what extent are the costs (incl. direct & indirect costs, e.g. administrative burden) of the intervention justified, given the effects it has achieved? Could the intervention have been done in a more efficient way and if so, how?*

This question is concerned with the costs linked to the intervention and whether these are justified in light of the results achieved. To answer this, the analysis considers the (i) total CCEI funding allocated, (ii) the administrative costs linked to the CCEI, and last (iii) perceptions from stakeholders on whether the costs and overall burden are justified.

CCEI funding allocated

The total funding allocated to first call projects was EUR 273.5 million. Regarding the second call, the full EUR 283.9 million have been allocated. In total, to date the CCEI has been endowed with EUR 557.4 million of EU funding.

For the first call alone over 1,300 pieces of equipment are expected to be purchased and installed with the support of CCEI funding for BCPs. Additionally, another 500 pieces of equipment are also funded for customs Labs. This represents a total of over 1,800 pieces of equipment. The cost

of an equipment item ranges from a few thousand euro (e.g. sniffer dog) to several millions (e.g. high energy X-ray). The average cost per item is EUR 151,944. At a more granular level, for BCPs the average cost would be EUR 190,153, and for Labs EUR 52,400. These unit costs are for CCE under the first call. Given the lack of data on the definitive number of equipment to be provided under the second call, it is not possible at this stage to provide an estimate of the unit cost taking into account second call equipment.

Administrative costs

This EQ is also concerned with the administrative costs incurred by customs authorities who have participated to the CCEI. As per the EU Standard Cost Model (SCM), to calculate the total administrative costs both direct and indirect costs should be considered. However, in the case of the CCEI assessing – let alone quantifying – indirect costs is highly challenging due to, in large part, the paucity of data, e.g. on training costs etc. As such, this section only focuses on direct costs, relying on staff time drawing on primary data collected as part of the questionnaire.

The responses to the questionnaire allowed for the quantification of the amount of time (expressed in staff days) needed to participate to the CCEI. The number of staff days required to handle CCEI tasks varied widely among MS given the variety of the team's composition dealing with CCEI tasks, as well as the different sizes of grants. In total, respondents from national customs authorities estimated that they had spent an average of just under 119 staff days per year on tasks related to their participation in the CCEI. Within this, the two most time-intensive activities are managing an active CCEI grant, which requires an average of 69 staff days annually, and preparing a CCEI grant application, which takes approximately 40 days. Looking in more detail, the wide gap between answers becomes visible, with some authorities indicating less than 10 staff days per year to manage an active grant, while others indicated it to be over 100 staff days or a full-time job. However, it should be noted that, for each task, a majority of respondents responded, but non-respondents are between 26% and 42%, including irregular, where Member States responded to some tasks but not for others.³¹ This is an important limitation to keep in mind when interpreting the estimates.

To monetise the administrative burden, the analysis draws on Eurostat data on the average remuneration of national civil servants in central public administrations³². In 2024, when the questionnaire was disseminated and the responses collected, the average salary for civil servants at EU-level was EUR 3,170 per month³³. However, it should be noted that this is an average which does not take into the account regional differences in remuneration across the EU. Moreover, while customs personnel may be considered to fall into this occupational category, there is likely to be a degree of variation within this group (and within the staff who have been involved in the management of the CCEI) in terms of remuneration based on tenure, role, level of expertise and other factors.

Nevertheless, working with the following assumptions based on the SCM:

- 1 working day: 8 working hours
- 1 working month: 20 working days
- Total working hours per month: (20 days) × (8 hours) = 160 hours

³¹ Malta and France (France only partly) provided explicitly irregular responses, meaning that they specified to use a different metric, we exclude them from the average.

³² Dataset: prc_rem_avg.

³³ https://ec.europa.eu/eurostat/databrowser/view/prc_rem_avg/default/table?lang=en.

- (Average) customs personnel hourly wage = (monthly salary) / (total working hours per month) = EUR 3,170 / 160 = EUR 19.81 per hour

With the above, the costs per MS linked to taking part in the CCEI can be estimated to be around EUR 18,833.76 annually. To this, in line with the SCM, overhead costs of 20% should be included, which would increase the amount to EUR 22,598.61.

In light of this, the total annual administrative cost across all MS (EUR 22,598.61 × 27) can be estimated at EUR 610,162.47 per year at the Instrument level. The total administrative cost over the lifecycle of the CCEI (i.e. 7 years) can be projected to be approx. EUR 4,271,100.

The table below provides an overview of the average staff time needed to deliver key tasks linked to the delivery of the CCEI and their associated monetised direct costs drawing on the same methodology outlined above. It is important to note that the frequency of the different tasks can vary – during the period in question (2021-2024), different MS were managing two, one or no CCEI grants, and applications obviously did not have to be submitted each year. Therefore, the estimated total staff resources per year (last row of the table) are not simply the sum of all the activities listed previously; instead, questionnaire respondents were asked to estimate these individually and separately.

Table 14: Overview and breakdown of average staff days needed to take part in the CCEI (per MS and year)

CCEI activity	Avg. number of staff days	Direct costs (staff time only)	Direct costs with (20%) overhead
Managing an active CCEI grant (per year and per grant)	68.88	EUR 10,916.10	EUR 13,098.22
Compiling a CCEI grant application, incl. the data required for the data model	39.76	EUR 6,301.16	EUR 7,560.86
Fulfilling reporting obligations for an active CCEI grant	15.00	EUR 2,377.20	EUR 2,852.40
Taking part in the CCEI Coordination Group	13.60	EUR 2,155.33	EUR 2,586.18
Other tasks	21.20	EUR 3,359.78	EUR 4,031.39
Total staff resources to take part in and manage the CCEI (per year so far on average)^{34*}	118.84	EUR 18,833.76	EUR 22,598.61

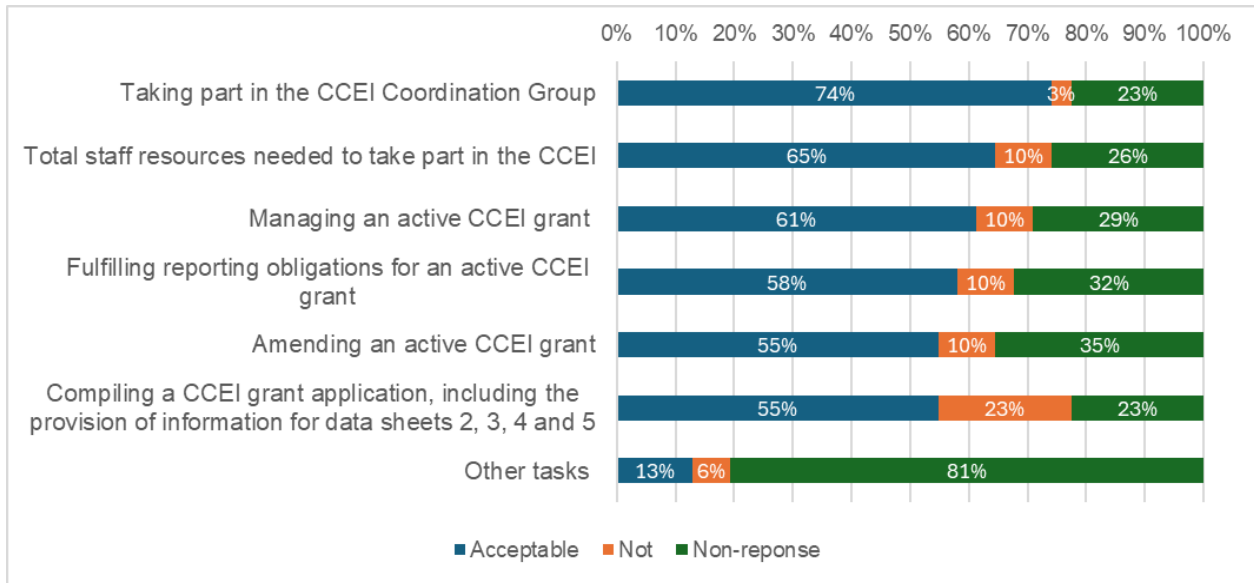
Source: Questionnaire responses from national customs administrations

Customs authorities' feedback on the administrative burden

Data from the questionnaire suggest that the majority of customs authorities considered the total amount of time dedicated to taking part in the CCEI to be acceptable (65%), while only a small minority (10%) thought it was excessive. However, a notable 23% of respondents reported not finding the amount of time at application stage to be acceptable. This was also further confirmed by interview feedback from customs administrations who noted that the data requirements were excessive and burdensome.

³⁴ Given not all tasks listed are always carried out once per year, the total is not the sum of the previous rows, but was put to questionnaire respondents as a separate question.

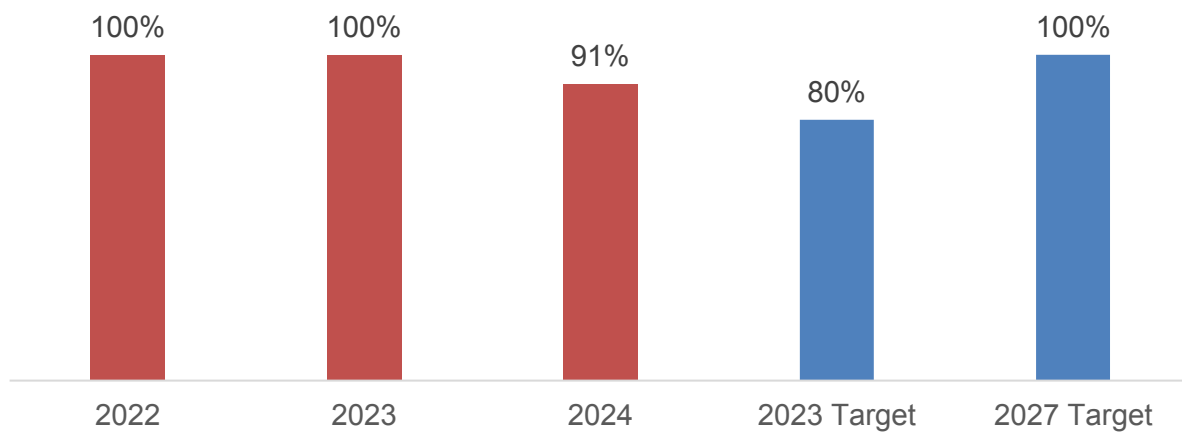
Figure 17: Level of acceptance of the number of staff days on average



Source: Questionnaire responses from national customs administrations

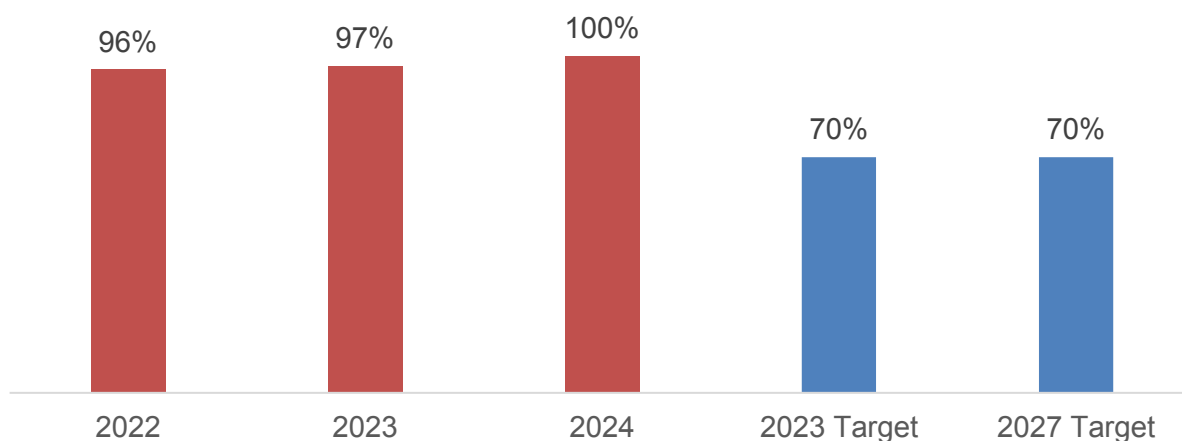
Moreover, survey data collected by DG TAXUD as part of the monitoring of the Instrument shows that adherence to timelines set out in the grant agreements while initially being fully compliant (100%) in 2022 and 2023 subsequently dropped to 91% in 2024, most likely reflecting the delays linked to public procurement discussed under effectiveness. Nevertheless, the overwhelming majority of customs administrations reported being satisfied with the programme management and support, which – in contrast to the adherence to deadlines / timelines indicator – steadily increased from 96% in 2022 to 100% in 2024 – see figure below.

Figure 18: Adherence to deadlines/timelines set out in the relevant grant agreements, 2022-2024



Source: MEF Data

Figure 19: Satisfaction with the programme management support and guidance provided, 2022-2024



Source: MEF Data

Summary response

Overall, the costs linked to the CCEI appear to be largely justified given the scale of funding provided to beneficiaries and the feedback gathered through these same beneficiaries. National customs authorities reported spending an average of 119 staff days annually on CCEI-related activities, translating to about EUR 22,600 per authority in administrative costs. This translates into approx. EUR 610,000 of administrative costs per year for the 27 MS taken together – which is equivalent to less than 0.5% of the annual CCEI budget. A significant proportion of these costs were spent on preparing and submitting proposals, suggesting that there is scope for further streamlining this step of the process to reduce lead times and the overall administrative burden. The potential for simplification is discussed in the next section (EQ 7).

EQ 7. What is the simplification potential of the intervention? How could procedures be optimised? How can the monitoring and reporting be improved?

This evaluation question is concerned with the scope for simplification of the CCEI. As set out under EQ 4, from a process perspective significant administrative costs are associated with preparing and submitting a CCEI application and relatedly with fulfilling data reporting obligations. Interview feedback also confirms that these two elements constitute the largest driver of the CCEI’s administrative burden on its beneficiaries. At an operational level, these elements are linked to the data model (discussed under EQ 4) and the Monitoring and Evaluation Framework (MEF).

There are important issues across several of the MEF indicators in terms of their quality / reliability. More specifically, the reliability of the data that has been collected to date was assessed to be ‘low’ for RES 1.1, RES 1.2, RES 1.3, and ‘medium’ for RES 1.4 (see table below). The low degree of reliability stems from a number of issues including but not limited to incomplete and late reporting, difficulties aggregating data expressed in different units etc.

Table 45: Overview and assessment of the reliability of MEF indicators

Indicator	Explanation	Reliability of data	Explanation
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Indicator	Explanation	Reliability of data	Explanation
OP 1.1	Number of equipment items requested under the 2021-2022 CCEI call that have been purchased/ maintained/ upgraded	High	Data quality is assessed as high since no particular issue was identified.
OP 1.2	Occupancy rate, that is the percentage of how many equipment items are used in a specific frequency, compared to the total items that are for that equipment category	High	Data quality is assessed as high since no particular issue was identified.
RES 1.1	Specific results related to seizures, controls, and hit rates achieved by MS through use of CCEI funded equipment	Low	Data quality is assessed as low due to significant reporting issues and inconsistencies. Out of 4,283 expected measurements, only 2,483 provided usable data after multiple corrective steps, with merely 823 offering updated figures from the initial baseline. The diversity of measurement units (e.g., samples, units, EUR, grams, time, percentages) further complicates data aggregation and interpretation. Consequently, the aggregated figures should be viewed as relative indicators rather than absolute values, as they effectively combine disparate measurement types
RES 1.3	Degree of adherence, that is the list of equipment that should be available per BCP/labs depending on the risks/threats that they are facing and what equipment items can address those risks/threats.	Low	Data quality is assessed as low due to challenges in the three-step calculation process. <ol style="list-style-type: none"> 1. Inventory data collection: MS self-report the equipment available at each BCP. This step is generally considered representative of the situation on the ground. 2. Risk assessment: The risks encountered by each MS are complex and influenced by a variety of factors, such as the type of BCP and its geographical location. Conducting a comprehensive and reliable risk assessment is therefore challenging. This is exacerbated by the dynamic nature of risks, where initially identified threats may no longer be relevant. 3. Equipment recommendations: Targets for recommended equipment levels are set for each BCP type by considering existing equipment and the results of the risk assessment. However, targets seem to have been set too ambitiously, affecting achievability.
RES 1.4	Coverage of risks and threats, which is calculated taking into account the matrix of equipment and risks.	Medium	Data quality is assessed as medium. The calculation of RES 1.4 is more representative than RES 1.3, as one relevant equipment item can cover multiple types of seizures/samples and threats. While challenges in risk assessment still exist, their impact is less significant than for RES 1.3. The main points highlighted for RES 1.3 are relevant but have a reduced impact on this indicator's reliability.

Feedback gathered from customs authorities has consistently underscored the difficulty in collecting the wide breadth of datapoints required by the CCEI. This is reflected in the lack of data completeness and poor quality of the data mentioned above. For example, 57% of the expected datapoints for RES 1.1 (2,483 out of 4,283 expected measurements) have been provided by customs authorities so far.

Additionally, a recurring suggestion in the responses to the questionnaire was to streamline the grant application process by minimising the requirement for extensive statistical data. This aligns with the analysis under EQ 6 which highlights that a significant portion of the administrative burden linked to the CCEI is attributable to the application process. At the same time, the actual use that has been made of the data so far (for the identification of needs, and for the monitoring and evaluation of progress) has been more limited than expected.

As such, the most significant simplification potential for the CCEI lies in revisiting the data requirements for some of the indicators in terms of their scope and level of granularity, with a view to prioritising the most critical data that directly align with the CCEI's objectives. At present, there is a high level of ambition with respect to the data collection which could be revisited in light of the issues and shortcomings identified by this evaluation.

More practically, potential avenues to achieve simplification in terms of the reporting could include:

- Consider removing some indicators, particularly those that have been proven to be challenging to collect data for. This may include some of the traffic data (sheet 4), as well as some of the “metrics to be used to measure the outcome / impact of the project”, including the targets (sheet 5). With respect to traffic data, some of the indicators, such as the number of seizures, can be difficult to interpret as they do not always directly reflect whether customs controls are more effective.
- Consider streamlining the framework, particularly the risk assessment. At present, there are a large number of individual threats to assess and rank in the application and reporting forms. The drawback from this would be that a less detailed risk assessment would be achieved, potentially not capturing as many threats. However, given the lack of consistent and exhausting ranking of threats, a ‘simplified’ risk assessment is arguably likely to lead to more comprehensive and higher quality risk assessments in future.

Other alternatives for simplification could be considered beyond revisiting the reporting requirements and the overall monitoring framework. For example, more innovative measures could be used to facilitate data collection. This would include dedicating some CCEI funding to support software and other IT tools to help automate the process of data collection and centralisation, which could then feed into the CCEI's MEF. Another potential for simplification is transitioning to a more user-friendly data collection tool potentially hosted on a secure online platform where data could be inputted in real time to encourage for more regular reporting.

These possibilities for simplification should be explored as part of the CCEI Coordination Group in order to ensure that any simplification measure is deemed useful and understood by CCEI beneficiaries.

Relevance

Table 16: Evaluation matrix for Relevance

Evaluation questions	Judgment criteria	Indicators	Data sources
8. To what extent have the objectives, scope and design of CCEI remained relevant, considering evolving EU needs and priorities in the field of customs?	Extent to which CCEI is aligned with <i>relevant EU policy and priorities</i> in the field of customs	Alignment between <i>CCEI's objectives</i> and EU customs policies and priorities Alignment between the <i>design of CCEI</i> and EU customs policies and priorities <i>Stakeholder views</i> on whether CCEI's objectives and design respond to EU policy needs and priorities in the field of customs	<ul style="list-style-type: none"> Document review Stakeholder interviews with EU officials Workshop
	Extent to which CCEI has adapted to <i>new and emerging</i> EU policies, priorities	Alignment between CCEI planning documents (e.g. MAWPs) with newly published customs policies and priorities (e.g. 2023 Customs Reform proposal, Roadmap to fight Drug Trafficking and Organised Crime) <i>Stakeholder views</i> on whether CCEI has successfully adapted to evolving EU policies and priorities	<ul style="list-style-type: none"> Document review Stakeholder interviews with EU officials Workshop
9. To what extent do stakeholders support the CCEI?	Extent to which stakeholders are favourable towards the objectives and design of CCEI	Proportion of MS customs authorities agreeing that CCEI is (1) necessary, and (2) appropriately designed <i>Views</i> of MS customs authorities on specific aspects of the CCEI objectives and design Level of MS interest in participating in CCEI	<ul style="list-style-type: none"> Document review CCEI monitoring data MS questionnaire responses Stakeholder interviews In-depth case studies
	Extent to which CCEI meets stakeholder needs	Alignment between CCEI objectives and planning documents with documentary evidence of MS needs (to the extent available, e.g. on national customs websites) Credibility / suitability of the needs assessments and related analysis done in the frame of CCEI <i>Stakeholder views</i> on the suitability of the needs assessment process <i>Views</i> of MS customs authorities on whether CCEI meets their specific needs Requests for additions to the list of eligible equipment and outcomes of these	<ul style="list-style-type: none"> Document review CCEI monitoring data MS questionnaire responses Stakeholder interviews In-depth case studies
10. To what extent has CCEI been able to adapt to developments in technology and the wider geopolitical and policy context beyond customs?	Extent to which CCEI is able to adapt to key contextual changes and new challenges concerning customs control equipment	Existence of changes in equipment needs due to emerging challenges (e.g. the war in Ukraine, growing e-commerce, developments in drug trafficking and production) Reflection of any new equipment needs related to contextual changes in CCEI list of eligible equipment and MAWPs <i>Stakeholder views</i> on ability of CCEI to adapt to contextual changes	<ul style="list-style-type: none"> Document review CCEI monitoring data MS questionnaire responses Stakeholder interviews In-depth case studies
	Extent to which the CCEI responds to the latest technological	Alignment of CCEI list of eligible equipment / MAWPs with international best practice for customs control equipment	<ul style="list-style-type: none"> Document review CCEI monitoring data

Evaluation questions	Judgment criteria	Indicators	Data sources
	developments in customs control equipment	Qualitative evidence on proposals / grants that concern innovative equipment Uptake of pilot projects for innovative equipment Alignment of programming / funding cycle with the timing of technological developments Degree to which eligible equipment is interoperable / uses standardised data formats Stakeholder views on the ability of CCEI to support the purchase of innovative / state-of-the-art equipment	<ul style="list-style-type: none"> • MS questionnaire responses • Stakeholder interviews • In-depth case studies

EQ 8. *To what extent have the objectives, scope and design of CCEI remained relevant, considering evolving EU needs and priorities in the field of customs?*

Extent to which CCEI is aligned with relevant EU policy and priorities in the field of customs

The CCEI was introduced to support adequate and equivalent customs controls across the EU by co-financing the purchase, maintenance, and upgrading of customs control equipment. Ensuring high-performance customs enforcement is a core objective of the EU Customs Union, making it essential that the CCEI aligns with the strategic priorities of the Union. Given the evolving nature of customs challenges, including geopolitical shifts, digitalisation, and organised crime threats, the instrument's relevance depends on its ability to address the most pressing enforcement needs while adapting to emerging policy frameworks.

An important indication for EU customs policies and priorities can be found in the EU Customs Strategy and the Customs Action Plan, which outline the long-term vision and immediate priorities for strengthening the Customs Union. The strategy focuses on creating a more data-driven, integrated, and resilient customs framework, ensuring that customs authorities across the EU operate as a single entity. Key priorities include modernising customs controls through digitalisation, improving risk management and data sharing, and enhancing cooperation between Member States to address security threats and trade challenges. The Customs Action Plan translates these goals into concrete initiatives, such as expanding data availability and analytics for customs supervision, reinforcing risk-based control mechanisms, streamlining e-commerce-related customs procedures, and promoting compliance through simplified reporting tools. Both documents emphasise equipping customs authorities with the necessary infrastructure and technologies to improve enforcement capabilities, combat fraud, and facilitate legitimate trade.

The CCEI aligns strongly with the needs outlined in the EU Customs Strategy and Customs Action Plan by addressing key priorities through its scope, objectives, and design. One of its key strengths is its broad scope, which allows customs authorities across all 27 Member States to access funding for a diverse range of customs control equipment. The instrument provides broad coverage of customs control equipment, supporting both BCPs and customs laboratories, and covering a wide range of equipment, from large-scale non-intrusive inspection systems to small-scale analytical tools. Its significant financial capacity allows Member States to make substantial upgrades, including investments in high-end, cutting-edge equipment that might otherwise be financially out of reach. Crucially, the instrument is available to all 27 Member States, ensuring that the entire EU Customs Union benefits from improved enforcement capabilities and reducing the risk of weak links at external borders. This supports the overarching strategic goal of ensuring that the Customs Union acts as one.

In terms of objectives, the CCEI contributes directly to the EU's customs priorities, as set out in the MAWPs. The first MAWP (2021-2022) focused on addressing equipment shortages and improving customs controls at the Union level, with a focus on urgent and short-term needs, while the second MAWP (2023-2024) expanded its focus to include mitigating international conflicts, supporting the implementation of EU sanctions, addressing e-commerce challenges, and promoting interoperability and innovation. These priorities align well with the Customs Strategy's emphasis on digitalisation, data-driven risk management, and enhanced enforcement capabilities. Furthermore, by aiming to fund advanced detection technologies, the CCEI plays a role in strengthening security at EU borders, a core objective of the Customs Action Plan.

The design of the CCEI reflects its broad scope and strategic objectives. The instrument is structured with a comprehensive list of eligible equipment, ensuring that customs authorities can tailor their applications to their specific needs while still contributing to the broader goals of the Customs Union. Moreover, its needs assessment and data reporting requirements are designed to support a more data-driven approach to customs operations, which is a central pillar of EU customs policy. By collecting detailed data on customs control equipment and risk management practices at the national level, the CCEI design not only aims at ensuring that investments are targeted and effective but also tries to lay the groundwork for future policy decisions, reinforcing the Customs Strategy's long-term vision for smarter, more integrated customs management. There is an overall strong alignment of the CCEI with EU customs priorities. The programme is a well-structured instrument that effectively addresses the most pressing challenges in the customs field.

While the broad scope of the CCEI is a key strength, it also presents challenges. The flexibility of the instrument, while ensuring broad participation, has led to a situation where it is difficult to ensure that all objectives are covered equally. Some limitations in the design of CCEI weaken its ability to align with all EU policy priorities equally. Specifically, the flexibility of the instrument has led to an uneven prioritisation of objectives, with innovation, sustainability, and interoperability receiving less emphasis compared to traditional enforcement and equipment replacement.

Some stakeholders noted that the lack of competition in the grant applications during the first call contributes to this imbalance. Since funding is distributed across Member States without a strong competitive element, there is limited incentive for customs administrations to propose innovative or interoperable solutions. This is reflected in feedback from a Commission official who reviewed applications and customs experts, noting that while some projects demonstrated innovative elements, many focused primarily on replacing outdated equipment. Importantly, this was largely in line with the focus of the first call, during which Member States were invited to target important shortages and also conduct upgrades of equipment. While innovation was still among the priorities during the first call, the Commission didn't actively steer authorities towards it and the absence of a competitive bidding process (due to a lack of oversubscription) meant that leverage was limited.

Another limitation stems from the grant evaluation and allocation process. One evaluator (i.e. Commission staff involved in evaluation of applications) expressed concerns that technical evaluation criteria were, in some instances, deprioritised in favour of ensuring geographical balance in funding allocation or other political considerations. This approach, while ensuring equal access across Member States, may have reduced the emphasis on strategic priorities such as interoperability or innovation. This approach may reduce the CCEI's potential to drive the next generation of customs enforcement technologies.

A final challenge relates to the relevance of data collection mechanisms. The needs assessment process has played a crucial role in providing a structured inventory of customs control

equipment across the EU. However, some Member States reported inconsistencies in how the process aligned with their national tracking methods, leading to difficulties in assessing real needs. Some Member States reported that the process does not always align with how they track and categorise their customs control capabilities. This has resulted in gaps in the quality and consistency of the data collected, potentially limiting the programme's ability to fully contribute to a data-driven customs enforcement model.³⁵

Extent to which CCEI has adapted to new and emerging EU policies and priorities

As EU customs policies and enforcement challenges continue to evolve, it is critical that the CCEI remains aligned with emerging priorities to ensure that customs administrations across the EU are adequately equipped to meet new demands. The instrument has demonstrated a high degree of adaptability in being able to align itself with new strategic priorities while maintaining its core objective of supporting customs control across the EU. The instrument did so primarily through adapting its objectives in the second MAWP, as well as incorporating these changes into the second call for applications. Additionally, the instrument's flexibility towards existing grants allowed for some timely adjustments in specific projects affected by the war in Ukraine. CCEI has particularly responded to geopolitical shifts, legislative developments, and changes in trade and enforcement challenges, notably through adjustments in the second MAWP for 2023-24. However, while the CCEI has shown flexibility in adapting to shifting policy priorities, some design features may have limited the extent to which the adaptation of the priorities can translate into reality.

The geopolitical landscape has played a defining role in shaping CCEI's priorities. Following Russia's full-scale invasion of Ukraine, EU customs administrations faced new enforcement challenges, including the implementation of EU sanctions, changes in border security requirements, and shifts in trade flows along the EU's eastern frontier. The CCEI responded by incorporating these geopolitical developments into its second MAWP, prioritising support for Member States in enforcing sanctions and securing alternative trade routes through the EU-Ukraine "solidarity lanes". Regarding ongoing projects after the first call, in practical terms, funding allocations were adjusted to reflect the shifting needs of customs administrations. For example, resources initially allocated to BCPs with Russia were redirected to support other enforcement needs, demonstrating the programme's flexibility. However, it cannot be said with certainty whether these reallocations fully reflected operational necessities, or whether some Member States redirected funding for convenience rather than to meet pressing needs. In the case study of the Finnish grant, foreseen equipment for BCPs at the Russian border was cancelled and replaced with equipment for smaller BCPs in the western part of the country. The analysis didn't suggest a structured reassessment mechanism to ensure that the new allocations were optimally deployed. While Finnish authorities linked the equipment needs to specific risks (i.e. smuggling routes along those ports), it did not become clear whether the revised project was of comparable urgency or priority to the originally proposed one.

Another important area of alignment is the fight against organised crime and illicit trafficking, particularly following the adoption of the EU Roadmap to Fight Drug Trafficking and Organised Crime (2023), including a European Ports Alliance.³⁶ This initiative highlights the critical role of customs authorities in preventing the infiltration of illicit goods into the EU and stresses the need for advanced scanning and detection technologies. The CCEI aligns well with this priority by

³⁵ For further insight on the data model and its implementation, see the sections above on effectiveness and efficiency.

³⁶ Communication from the Commission to the European Parliament and the Council on the EU roadmap to fight drug trafficking and organised crime, COM(2023) 641 final, 18.10.2023.

financing non-intrusive detection systems, mobile scanners, and chemical analysis equipment, strengthening customs capacity to detect illegal substances and contraband.

One of the most significant policy developments in recent years has been the proposal for an EU Customs Reform, published in 2023. Even though the reform has not been adopted, it serves as an illustration of the changing needs and priorities in the field of customs at the EU-level. The reform seeks to modernise customs operations by making them more data-driven, harmonised, and risk-based, including the creation of a centralised EU Customs Data Hub and an EU Customs Authority to oversee integrated risk assessment and digital customs processes. CCEI was designed to align with these aspects as well by fostering a needs and risk assessment that was aimed to inform funding decisions and make the Customs Union more data driven. The second MAWP further acknowledged some of these emerging needs by placing greater emphasis on interoperability and innovation, aligning partially with the Customs Reform's push towards enhanced data-sharing and intelligence-driven customs enforcement.

The difference in approach between the first and second calls for applications under the CCEI further illustrates the instrument's adaptive capacity, but also its limitations in ensuring consistent alignment with evolving EU priorities. The first call was relatively open, allowing Member States to focus on replacing outdated equipment and filling critical capacity gaps. The second call introduced more targeted priorities, reflecting new geopolitical and enforcement challenges, and providing Member States with specific recommendations on priority equipment needs. Notably, the second call made safety and security a mandatory priority, requiring all project proposals to address at least one security-related risk, whereas other policy priorities remained optional. Additionally, while the types of equipment eligible for funding remained unchanged, the second call introduced stricter security and cybersecurity requirements, including references to the NIS2 Directive³⁷ and Commission security guidance to ensure compliance with EU security standards.

A difference in the second call was the introduction of more top-down elements to the bottom-up approach of the first call, where Member States had significant discretion in selecting equipment and project focus. These elements contained the granting authority providing specific recommendations that Member States were invited to address in their applications. This adjustment aimed to ensure that funded projects aligned more closely with the EU's strategic customs priorities. The second call also increased the minimum passing score from 48 to 53, raising the threshold for Relevance and Innovation, effectively making it slightly more demanding for applications to succeed. However, while the second call sought to strengthen alignment with key policy areas, most types of equipment could still be justified under the new framework with only minor adjustments in project rationale. For example, conventional baggage x-ray machines could be justified under both detection of drugs and of smuggled antiquities, making it difficult to determine whether the more targeted approach significantly changed the nature of funded projects.

Despite these challenges, interviews with European Commission officials and groupings such as CELBET confirmed the adaptability of CCEI. Its ability to adjust priorities between funding cycles is a positive feature of its design, which ensures continued alignment with emerging needs. Having said that, the slow implementation of many projects has made it difficult to assess whether the equipment being purchased across the EU is leading to evolving relevance for future calls and WPs. With many projects from the first call still ongoing, it seems too early to

³⁷ Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (NIS 2 Directive).

comment on whether the newly acquired equipment has significantly improved customs operations and altered the needs and priorities that the programme should align with.

Summary response

Overall, CCEI shows a high level of relevance, aligning well with EU needs and priorities in the field of customs. Its broad scope, including extensive lists of equipment for both BCPs and customs laboratories, its EU-wide coverage, and its significant financial scope are designed to allow Member States to upgrade critical enforcement capabilities. By financing modern detection technologies and addressing key enforcement gaps, the instrument also directly supports EU objectives in customs modernisation, and working towards the Customs Union acting as one with raising the general level of equipment.

The instrument has also demonstrated adaptability, particularly through adjustments made in the second MAWP (2023-24). These shifts reflect geopolitical changes, such as supporting EU sanctions enforcement after Russia's full-scale invasion of Ukraine, and addressing new customs challenges in e-commerce and organised crime prevention. CCEI has also shown flexibility in reallocating funding, though it remains unclear whether these shifts fully reflected operational needs.

Despite its strong relevance, the CCEI's breadth and flexibility hinder its ability to place focus on certain priorities. The lack of competitive bidding during the first call and the high degree of Member State discretion have led to some objectives, such as innovation, interoperability, and sustainability, receiving less emphasis in funded projects. While the second call for applications introduced more targeted priorities, Member States maintain considerable leeway in selecting the equipment to target.

Finally, while CCEI's continued relevance is widely acknowledged by stakeholders, the slow implementation of many projects makes it difficult to assess the changing relevance of CCEI as a whole and for future calls and WPs. With many first-call projects still ongoing, it remains to be seen whether the procured equipment requires adjustments to the programme's design and objectives for it to stay as relevant. Moving forward, ensuring that Member States' applications better align with EU-wide customs objectives may require stronger strategic steering and clearer guidance on priority investments.

EQ 9. To what extent do stakeholders support the CCEI?

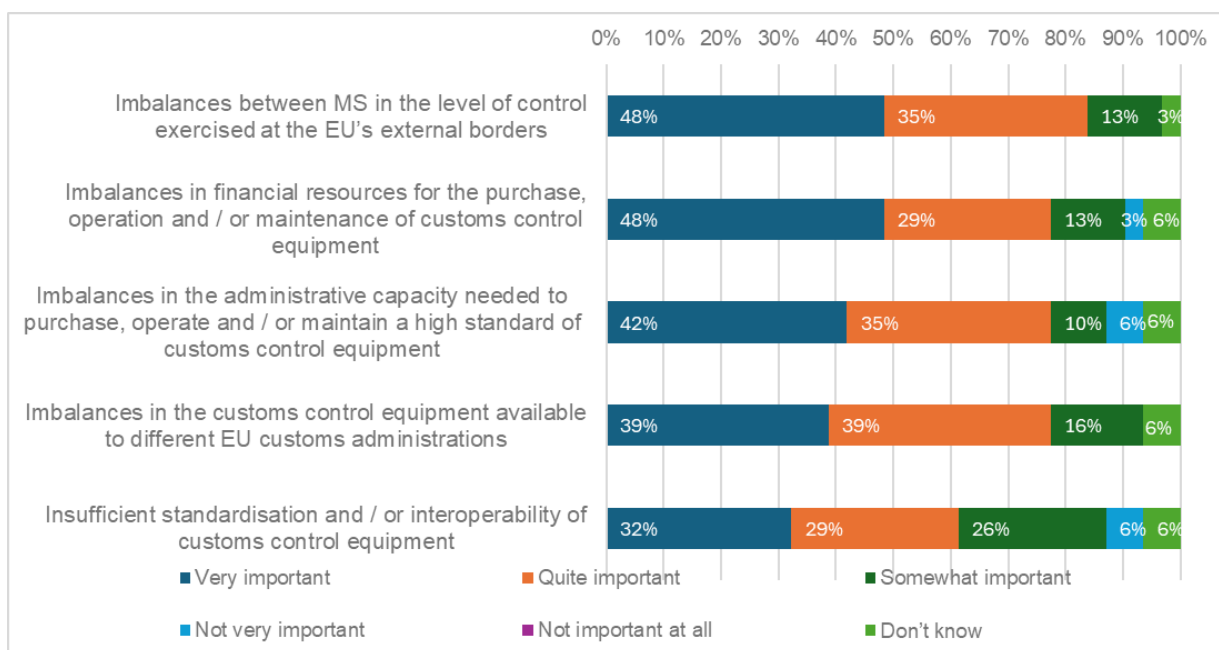
Extent to which stakeholders are favourable towards the objectives and design of CCEI

Ensuring effective and harmonised customs control across the EU is a shared objective among Member States, and the CCEI is widely supported as a tool for strengthening customs enforcement capacity. Stakeholder feedback indicates that national customs authorities broadly endorse the instrument's objectives and see it as a necessary mechanism for addressing disparities in customs control capabilities. While there is some divergence in perspectives regarding certain design aspects, overall, Member States have shown strong interest in participating in the CCEI, with all 27 countries securing grants under at least one of the two calls for proposals.

Customs administrations generally perceive the CCEI as a relevant and useful instrument, reflecting a widely held view that EU-level financial support is needed to enhance customs control equipment. As shown in the graph below from the questionnaire, customs authorities overwhelmingly agreed on the importance of reducing imbalances in customs control capabilities (48% considered it very important and 35% somewhat important), with a large majority identifying disparities in financial resources (48%), administrative capacity (42%), and availability of customs control equipment (39%) as key concerns. The principle that the Customs

Union is only as strong as its weakest link was emphasised by several Member States in their explanatory remarks to that question, reinforcing the rationale for an EU funding instrument and EU-level coordination on matters of customs control equipment. Many respondents viewed the CCEI as a means of ensuring a baseline standard of enforcement across all Member States. This sentiment was echoed in interviews, with several customs authorities, highlighting that the CCEI has been instrumental in reinforcing security at key BCPs.

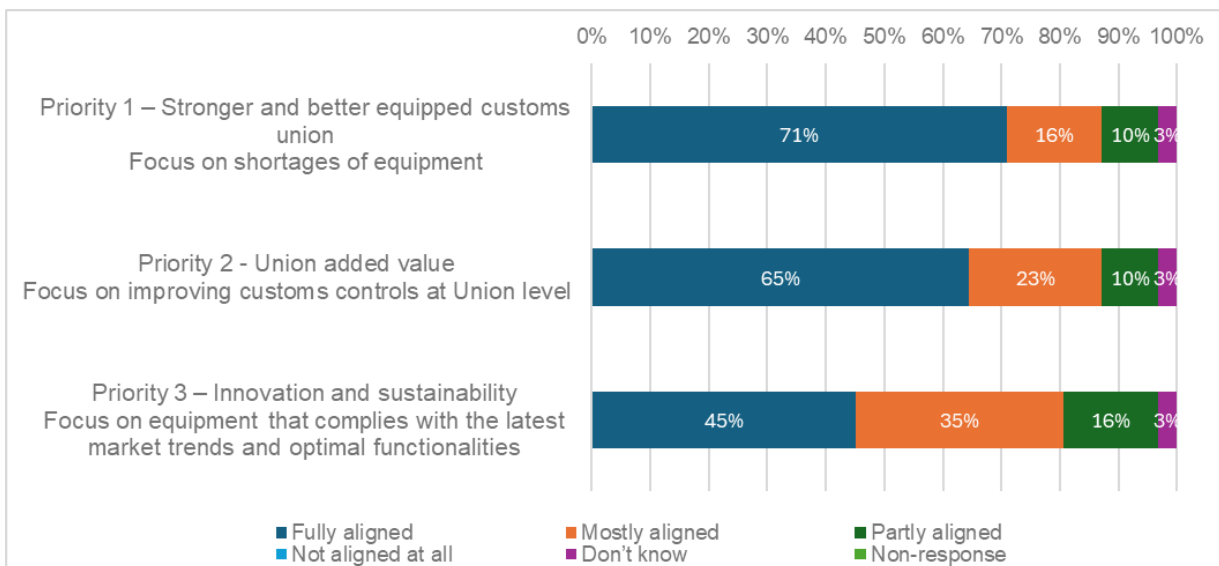
Figure 20: How important are the following issues and challenges from the perspective of your customs administration?



Source: Questionnaire responses from national customs administrations

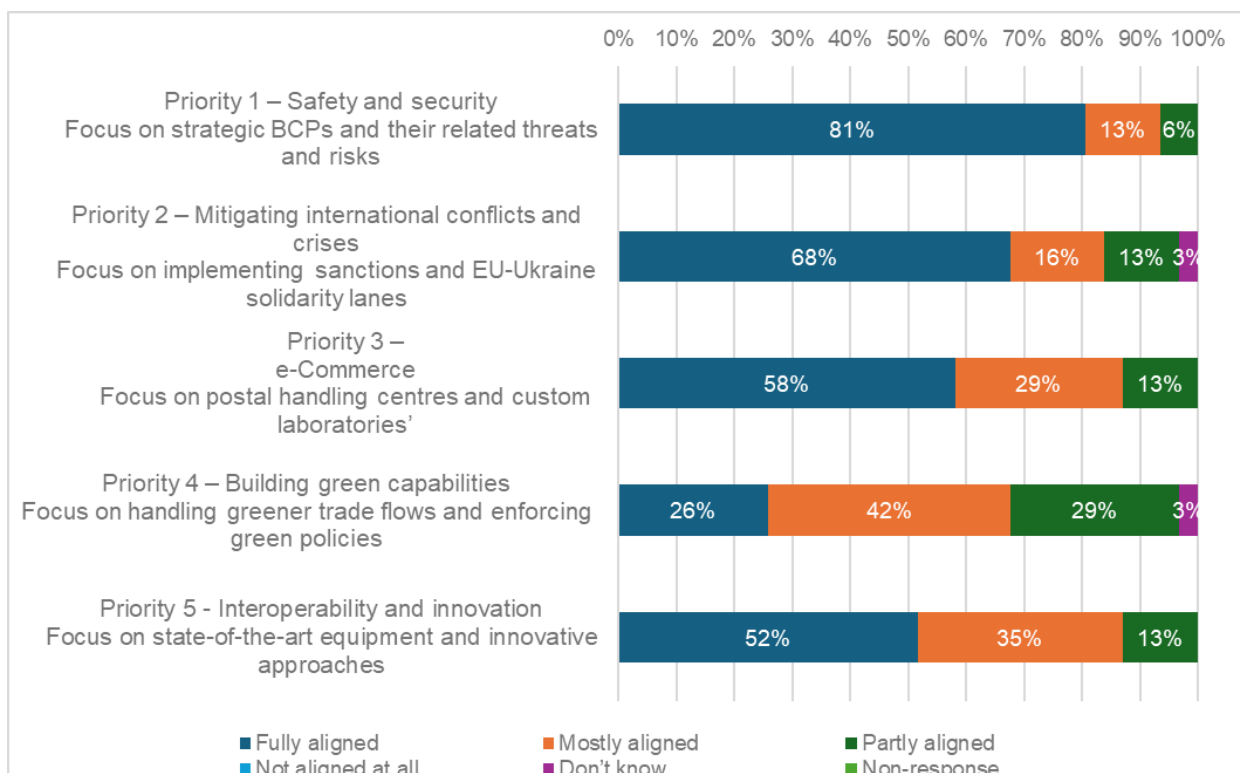
When it comes to the objectives of CCEI, Member States showed strong agreement with the specific priorities outlined in the first and second MAWPs. In the questionnaire, a vast majority of respondents (71%) found that addressing equipment shortages in the first MAWP fully aligned with their national priorities, while 65% supported the focus on improving customs controls across the Union. Similarly, in the second MAWP, 81% of responding authorities fully agreed with the prioritisation of strategic BCPs and their related risks, while 68% supported the emphasis on mitigating international conflicts and crises. However, innovation and sustainability were ranked as lower priorities by customs administrations, with only 26% fully aligning with the goal of building greener capabilities. In interviews, some Member States recognised the potential for the CCEI to drive innovation in customs controls, while others maintained that their primary focus remained on enforcement and risk management.

Figure 21: To what extent are the priorities for the first Multi-Annual Work Programme (2021-22) still important for your country?



Source: Questionnaire responses from national customs administrations.

Figure 3: To what extent are the priorities for the second Multi-Annual Work Programme (2023-24) still important for your country?



Source: Questionnaire responses from national customs administrations.

Despite broad support for the programme's objectives, some aspects of its design received mixed feedback. One recurring concern among stakeholders relates to the procurement process, which has been a source of difficulty for several Member States. With CCEI being designed in a way that leaves equipment procurement entirely to the discretion of Member States, some case studies highlighted that procurement delays can significantly disrupt project implementation.

Officials suggested that additional EU-level guidance could help mitigate challenges, particularly for customs authorities with limited experience in managing large-scale equipment tenders. A few Member State authorities suggested that a form of joint procurement or centralised procurement at the EU-level could facilitate the instrument. However, views on potentially incorporating such elements into the design of the CCEI vary, with some countries advocating for greater standardisation or even centralised procurement while others prefer maintaining national discretion.

Similarly, when it comes to the question of enhancing EU-level guidance on what equipment to purchase in the design of the instrument, some authorities suggested that the Commission could play a more active role in coordinating equipment needs to better address the most urgent needs of the Customs Union as a whole and to improve standardisation. This was met with scepticism by others, who rather wished for a more trust-based approach, in which Member States are trusted to select the correct type of equipment. This difference in opinion on the design reflects the conflict between the bottom-up approach that CCEI has largely taken so far, and the more top-down elements, which the Commission started to introduce during the second round of grant applications.

In terms of interest in participation, engagement with the CCEI has been strong across the EU, with all Member States securing funding in at least one of the two calls so far. The size of the grants varies significantly, and a few Member States have indicated that participation is somewhat burdensome, particularly those that applied for smaller grants. Some smaller recipients have questioned whether the administrative effort required to apply for and manage CCEI projects is proportionate to the funding received. Moreover, the motivation to participate seems impacted by the availability of resources at the national level, with a few Member States not assessing the need as high enough to apply for the instrument repeatedly. Nonetheless, overall participation levels indicate that most customs authorities continue to see value in the programme.

Taken together, the evidence suggests that the CCEI enjoys strong support from national customs authorities, both in principle and in practice. While there are areas where the design of the programme could be refined, stakeholders widely agree on the necessity of an EU-level financial instrument to support customs control equipment. The high level of participation in the first two calls reflects Member States' continued interest in leveraging CCEI funding to modernise and enhance their customs operations.

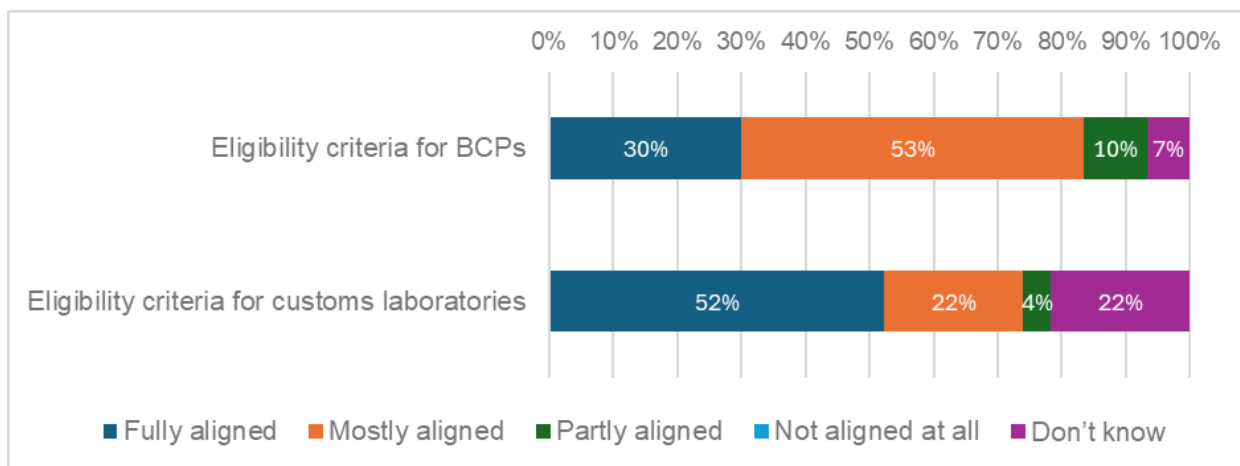
Extent to which CCEI meets stakeholder needs

The extent to which the CCEI meets stakeholder needs is a key factor in assessing its relevance. While the CCEI has been broadly welcomed by Member States as a valuable funding mechanism, perspectives on whether it fully meets their needs vary. In particular, some customs administrations have questioned aspects of the needs assessment process, while others have pointed to gaps in the eligibility criteria that may limit the programme's effectiveness in addressing their specific requirements.

The responses from Member States suggest that CCEI largely aligns with their operational needs, with most authorities considering the programme to be a valuable source of funding. In the questionnaire, a majority of respondents agreed that the eligibility criteria align with their equipment needs and priorities, particularly in relation to customs laboratories, where over half of authorities (52%) found full alignment. With that being said, for BCPs, the level of full alignment was lower at 30%, with most respondents (53%) viewing the criteria as 'mostly aligned'. In elaborating on these responses, several customs authorities expressed concerns that while the eligible equipment list broadly covers necessary items, it does not go far enough in addressing specific gaps. For example, it was emphasised that certain non-intrusive detection

tools, officer protection equipment, and monitoring devices such as CO₂ and F-gas analytical detectors are missing. Similarly, infrastructure costs, which are often essential for the installation and effective use of customs control equipment, remain ineligible for CCEI funding. However, the exclusion of infrastructure is also a justifiable design choice. Expanding eligibility to infrastructure costs would not only further dilute the programme’s already broad scope but also complicate funding allocation by making it difficult to define clear boundaries on what constitutes eligible infrastructure. Ensuring a targeted focus on customs control equipment prevents the programme from becoming too open-ended and difficult to steer strategically.

Figure 23: To what extent do the eligibility criteria align with the equipment needs and priorities of your administration?



Source: Questionnaire responses from national customs administrations.

Summary Response

The CCEI enjoys strong overall support from national customs authorities, with Member States widely recognising its role in strengthening customs enforcement across the EU. Stakeholders largely endorse its objectives, particularly in addressing disparities in customs control capacities and ensuring a more harmonised Customs Union. All 27 Member States have participated in at least one of the two calls for proposals. This demonstrates a high level of engagement and continued interest in leveraging CCEI funding, even though participation and engagement have differed between Member States, with a few authorities not assessing the need as high enough to make it worth the effort. The instrument is, nonetheless, widely perceived as a necessary tool, particularly for addressing financial and resource imbalances between Member States, which was a key concern highlighted in the questionnaire and interviews. However, while customs authorities broadly support the programme, perspectives on certain design elements vary, particularly in relation to: whether equipment selection and procurement should be left to the Member States or be coordinated more at an EU-level; whether the design of reporting structures is appropriate or should be tailored more to daily operations of customs authorities; and to what extent standardisation efforts should be at the centre of the CCEI or not.

The extent to which CCEI meets stakeholder needs is somewhat more nuanced. While most Member States consider it a valuable funding instrument, some have raised concerns about whether it fully addresses their specific needs. The eligibility criteria are generally seen as well-aligned with national priorities, particularly for customs laboratories, but gaps remain – especially for BCPs – where infrastructure, software, and certain types of detection and protection equipment are missing from the eligible list. Additionally, some Member States would prefer greater flexibility in the eligibility framework to allow for emerging technological solutions and better meet their needs.

EQ 10. *To what extent has CCEI been able to adapt to developments in technology and the wider geopolitical and policy context beyond customs?*

Extent to which CCEI is able to adapt to key contextual changes and new challenges concerning customs control equipment

Customs enforcement operates within a dynamic environment shaped by geopolitical developments, evolving security threats, and technological advancements. As trade flows shift and new risks emerge, such as the war in Ukraine, drug trafficking, and cyber threats, customs authorities must continuously adapt their control measures. The CCEI is designed to support these efforts by financing the purchase and upgrade of customs control equipment, but its ability to keep pace with evolving needs depends on how flexibly it can accommodate emerging challenges. This section examines how the CCEI has responded to contextual changes, including whether new equipment priorities have influenced funding allocations and whether customs administrations perceive the instrument as sufficiently adaptable to their operational realities.

A key example of changing needs due to geopolitical developments is the impact of Russia's full-scale invasion of Ukraine on customs enforcement. The case studies illustrate how border closures and shifts in trade flows have altered the deployment of customs control equipment. For instance, Finland originally planned its CCEI-funded project to enhance BCPs along its eastern frontier with Russia and Norway. However, following Russia's invasion of Ukraine and the subsequent closure of Finland's eastern border, the project was revised substantially. The Finnish authorities reallocated funding away from traffic-related customs control equipment such as ANPR systems at now-closed BCPs and redirected it to strengthen control capabilities at ports in western Finland, which experienced increased traffic due to trade route diversions. Similarly, Lithuanian customs officials reported a shift in focus from import controls to export enforcement to ensure compliance with EU sanctions. The flexibility of the CCEI allowed these adjustments to take place, supporting customs authorities in addressing evolving needs without requiring an entirely new round of funding.

More broadly, the adaptability of the CCEI has been reflected in its MAWPs, which incorporate evolving priorities. The second MAWP (2023–24) explicitly integrates policy developments such as the EU Roadmap to Fight Drug Trafficking and Organised Crime, reinforcing the role of customs control equipment in countering illicit trade and financial crime. The MAWP aligns CCEI support with the European Ports Alliance initiative, which seeks to enhance drug detection capacities at key maritime entry points. This reflects an awareness of customs authorities' growing need for high-performance scanning and analytical equipment to manage the increasing volume of illicit drugs trafficked through European ports. The CCEI's ability to integrate these priorities into its funding calls suggests a strong level of responsiveness to external policy shifts.

However, while CCEI has been effective in accommodating shifts in customs control priorities, some stakeholders expressed concerns about gaps in adaptation, particularly in relation to cybersecurity and procurement security. As geopolitical tensions have intensified, customs administrations have become increasingly wary of sourcing customs control equipment from certain non-EU manufacturers due to concerns over data security and potential vulnerabilities in critical infrastructure. Several Member States reported encountering difficulties when trying to factor security considerations into their procurement processes. The absence of explicit guidance from the Commission on security-related procurement standards has left some authorities uncertain about how to approach these concerns while ensuring compliance with EU procurement rules. Industry stakeholders also raised concerns about the dominance of non-EU suppliers, particularly from China, in the customs control equipment market. Some suggested that the CCEI could do more to encourage European strategic autonomy in this sector, for

example by introducing procurement criteria that place greater emphasis on security and quality over cost alone.

While the flexibility of the CCEI has been largely praised, Member States have pointed to areas where further improvements could be made in anticipating rather than reacting to emerging challenges. One recurring issue is the ability of the needs assessment process to fully capture the evolving risk landscape. Discrepancies between reported risk scores for BCPs and actual equipment inventories were identified for some Member States, affecting the prioritisation of investments. The risk scoring methodology was perceived as inconsistent, as Member States were not required to score all identified risk factors and not all authorities appeared to grasp the correct way to conduct the risk scoring, which led to variations in how risks were assessed across different jurisdictions. Additionally, accurate inventory reporting has proven challenging for some authorities, with Member States citing difficulties in maintaining precise records of existing equipment, which in turn complicates planning for future investments.

Extent to which the CCEI responds to the latest technological developments in customs control equipment

One of the objectives of the CCEI is to support the modernisation of customs control equipment by ensuring that Member States have access to state-of-the-art tools for border management and enforcement. In addition to addressing equipment shortages and ensuring equivalent levels of customs control across the EU, the programme was also intended to foster innovation in customs control equipment and – related to that but not an explicit objective in itself – promote greater standardisation of technologies used by Member States. The ability to incorporate emerging technologies and align procurement with evolving international best practices is therefore an important aspect of the programme's relevance. This section examines the extent to which the CCEI has supported technological advancements, facilitated the uptake of innovative solutions, and encouraged standardisation in customs control equipment across the EU.

Stakeholder feedback suggests that many CCEI-funded projects during the first call have focused on replacing ageing equipment and improving detection technologies more broadly rather than piloting or integrating innovative solutions. This approach by national authorities aligned well with the focus of the first call under the CCEI, which highlighted maintaining and upgrading of equipment as core targets. It further was in line with Member States' priorities, as they have generally valued reliability and immediate operational needs over experimental or state-of-the-art equipment. During the first call, the programme still encouraged investment in cutting-edge technologies (as visible both in the first MAWP and call for application), but without a structured incentive or pressure to prioritise them in a more bottom-up approach to the programme. Even though the bidding is designed as a competitive process, the fact that the first call was not oversubscribed led to a non-competitive setting, in which customs authorities largely received what they applied for and leverage for steering was limited. As a result, it was largely left to individual customs administrations to decide whether to incorporate innovative elements into their projects.

Some stakeholders, including industry representatives and certain Member States, have suggested that eligibility criteria should be broadened to better accommodate emerging technologies such as AI-powered detection systems and drone surveillance. Germany, for example, recommended that the Commission periodically review the eligibility criteria to incorporate advancements in customs control equipment. Industry representatives further noted that companies producing innovative equipment often struggle to get their solutions included in the eligible equipment list or noticed by customs authorities, with some proposing a process similar to the US model, where pre-procurement funding is available for developing and testing emerging technologies.

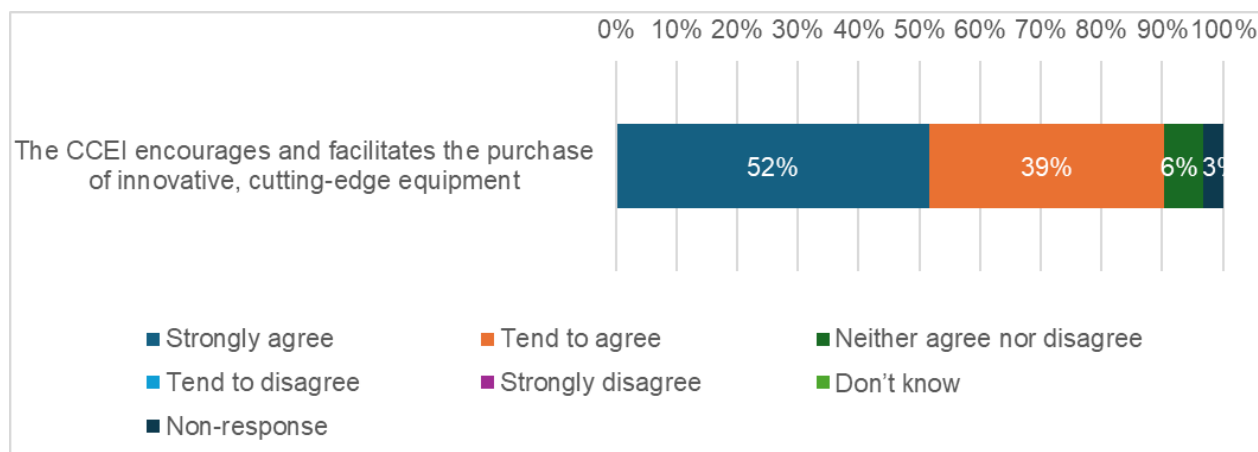
The evaluation identified a limited number of CCEI-funded projects that incorporated particularly innovative elements during the first round of projects. The Dutch case study offers one example where the grant was used to introduce advanced scanning and detection technologies at major cargo and passenger entry points, including the Port of Rotterdam and Schiphol Airport. The project aimed to integrate equipment into a cohesive detection network, leveraging AI and algorithmic analysis to enhance customs controls. However, despite these ambitions, officials noted that full implementation of the envisioned data integration and AI-driven detection had not yet materialised at the time of preparing the case study. More generally, Commission staff serving as application evaluators for CCEI acknowledged that while some proposals demonstrated a strong focus on innovation, others placed little emphasis on it and still managed to secure funding. The fact that safety and security were the only mandatory priorities also in the second call for applications, combined with a (de facto) non-competitive application process, has contributed to innovation being a lower-rated aspect of project evaluations overall.

Another challenge concerns the alignment between the CCEI programming cycle and the pace of technological advancement. Customs authorities and industry stakeholders highlighted that procurement cycles under the CCEI are relatively slow, which may delay the uptake of emerging technologies. The lack of dedicated funding for pilot projects or pre-procurement testing further limits the programme's capacity to harness technological advancement. In interviews, a few Member State officials suggested that future CCEI calls should include mechanisms for funding the development and piloting of new technologies, rather than focusing solely on procurement.

Interoperability also emerged as areas where the CCEI's relevance has been limited, as well as for standardisation. While the programme aims to promote harmonisation across the EU, customs authorities and industry representatives reported ongoing challenges related to data integration and standardisation of equipment. Industry stakeholders noted that the absence of EU-wide technical standards for customs control equipment leads to inefficiencies, as manufacturers must adapt their products to varying national specifications. This increases costs and complicates future equipment upgrades and maintenance. In Ireland, for example, customs authorities highlighted the lack of integration between different national customs systems, emphasising that data protection concerns sometimes prevent effective information-sharing between Member States. Similarly, one official pointed out that while the CCEI encourages interoperability, data-sharing initiatives were suspended due to concerns about equipment from certain non-EU providers being used in some countries, reflecting broader geopolitical tensions in procurement decisions.

Despite these shortcomings, most Member States acknowledge that the CCEI has played an important role in ensuring access to modern customs control tools. The questionnaire results indicate that 52% of national authorities strongly agreed, and another 39% tended to agree, that the CCEI encourages the purchase of innovative equipment. However, qualitative feedback suggests that this is not necessarily due to the programme actively prioritising technological advancement, but rather because it provides much-needed funding for equipment upgrades. Some Member States emphasised that the CCEI could further enhance its impact by expanding support beyond equipment procurement to include digital solutions, software development, and AI-driven risk analysis tools.

Figure 24: Please express your level of agreement with the following assumptions on the deployment of CCEI funding



Source: Questionnaire responses from national customs administrations.

Summary response

The CCEI has demonstrated a notable degree of flexibility in adapting to evolving geopolitical and policy contexts, particularly in response to crises such as the war in Ukraine. The ability of Member States to amend ongoing projects and reallocate funding has been widely praised, allowing customs authorities to shift equipment deployments in response to trade flow disruptions and evolving enforcement priorities. The incorporation of emerging policy priorities, such as drug trafficking and organised crime, into the second MAWP further illustrates the programme’s responsiveness to external developments. However, while CCEI has proven adaptable in reallocating resources and adjusting funding priorities, some limitations persist. One key concern is the lack of explicit guidance on security-related procurement issues, with Member States facing challenges in navigating concerns over equipment sourcing, particularly from non-EU providers.

In contrast, the CCEI’s alignment with technological advancements in customs control equipment presents a more mixed picture. While the programme has facilitated the modernisation of customs enforcement by funding essential equipment upgrades, its role in fostering innovation has been relatively limited. Member States have generally prioritised the replacement of ageing equipment over the adoption of emerging technologies during the first call, and the lack of competition during the application process has meant that innovation has not been a decisive factor in project evaluations. Nonetheless, some projects, such as visible in the Dutch case study, have integrated advanced scanning and AI-driven detection tools. Stakeholders have suggested that the programme could do more to facilitate the uptake of emerging technologies by broadening eligibility criteria and providing dedicated funding for pilot projects and research-driven innovation.

Furthermore, interoperability and standardisation remain areas where steering has been limited. While the CCEI aims to promote greater harmonisation in customs control equipment, variations in national procurement practices and a lack of common technical standards have reportedly led to inefficiencies and increased costs for manufacturers. Some Member States have also raised concerns about data integration challenges, with geopolitical considerations further complicating cross-border information-sharing initiatives. Despite these challenges, customs authorities generally acknowledge that the CCEI has played a crucial role in ensuring access to modern enforcement tools.

Coherence

Table 57: Evaluation matrix for Coherence

Evaluation questions	Judgment criteria	Indicators	Data sources
11. To what extent are the various elements of CCEI coherent with one another and maximising the generation of synergies?	Extent to which CCEI is comprised of a coherent and mutually supportive mix of activities	Soundness of the CCEI intervention logic Stakeholder views on the balance between different CCEI components and activities Evidence / examples of any inconsistencies / gaps between parts of CCEI	<ul style="list-style-type: none"> Document review Stakeholder interviews MS questionnaire responses
	Extent to which synergies within CCEI are materialising in practice	Evidence / examples of synergies between CCEI grants and supporting activities Evidence / examples of synergies between CCEI grants (including complementarities described in applications and evidence of this in practice, both within and between countries) Evidence / examples of any issues, e.g. wrong balance between purchases of new equipment and maintenance	<ul style="list-style-type: none"> CCEI monitoring data Stakeholder interviews MS questionnaire responses In-depth case studies
12. To what extent is CCEI coherent with relevant Customs Union and wider EU policies, programmes, funds and instruments, and maximising synergies in practice?	Extent to which CCEI is coherent with EU customs policy and wider policy priorities	Level of alignment between CCEI documentation and relevant EU policies and strategies Stakeholder views on whether CCEI and relevant EU policies and strategies are complementary and mutually reinforcing Evidence of / examples of any inconsistencies / gaps between CCEI and relevant EU policies and strategies	<ul style="list-style-type: none"> Document review Stakeholder interviews with EU officials
	Extent to which CCEI is coherent with other EU programmes, funds and instruments	Level of alignment between CCEI documentation and relevant EU programmes, funds and initiatives Stakeholder feedback on whether CCEI complements and avoids duplication with relevant EU programmes, funds and initiatives Evidence of / examples of any inconsistencies / gaps between CCEI and relevant EU programmes, funds and instruments	<ul style="list-style-type: none"> Document review Stakeholder interviews with EU officials
	Extent to which synergies between CCEI and other initiatives are materialising in practice Extent to which equipment purchased is shared with and supports the work of other border authorities	Evidence / examples of synergies / duplication / issues between CCEI grants and other policies and strategies Evidence / examples of synergies / duplication / issues between CCEI grants and funding / projects from other programmes, funds and instruments Evidence / examples of synergies / duplication / issues between CCEI grants and the work of other border authorities	<ul style="list-style-type: none"> CCEI monitoring data Stakeholder interviews MS questionnaire responses In-depth case studies

EQ 11. *To what extent are the various elements of CCEI coherent with one another and maximising the generation of synergies?*

This evaluation question addresses the internal coherence of the Instrument and assesses the extent to which its activities and component parts fit together. The CCEI's Regulation and intervention logic sets out a relatively simple delivery model based predominantly on direct

financial support through grant funding. While the Instrument's main activity provides grants "for the purchase, maintenance and upgrade of customs control equipment", to respond to this question the evaluation looks at the extent to which this is supported by non-financial activities making use particularly of Commission documentation and interview feedback. It also examines whether synergies between CCEI grants and other aspects of the programme have materialised, focusing particularly on the issue of joint procurement.

Extent to which CCEI is comprised of a coherent and mutually supportive mix of activities

The question of whether the CCEI is internally coherent is made somewhat more straightforward by the fact that the CCEI does not carry out a large "mix of activities". While assessing the extent to which the Instrument's objectives are internally coherent with the style of programme delivery is an important line of inquiry, this is covered under the relevance EQs above.

The Instrument is focused mostly on providing direct co-financing. Article 6 of the Regulation stipulates that direct financing is available for six eligible "purposes": a) non-intrusive inspection; (b) indication of hidden objects on humans; (c) radiation detection and nuclide identification; (d) analysis of samples in laboratories; (e) sampling and field analysis of samples; (f) handheld search. While the value of these purposes and the eligibility of types of equipment is explored under the Relevance EQs, there is no evidence to suggest that these "purposes" are not complementary or collectively do not fully cover the needs of Member States. Furthermore, the other major distinction in the type of activities is the appropriateness of the mix of funding for BCPs and customs laboratories. While the spending is divided into 80% for BCPs and 20% for Labs, there is no evidence of any discontent with this split, nor any very positive feedback on it. However, as outlined in EQ 3, both the demand (in terms of applications) and spend was higher for BCPs than the original allocation, prompting the questions of whether this division should be increased further for funding for BCPs.

The Commission also supports the Member States with central guidance on procurement in the form of call documents and support through the aforementioned support officers. In this respect, the majority of MS share a positive view on how the CCEI is being managed, with a majority believing the guidance provided by DG TAXUD for CCEI participation is sufficiently clear (52% strongly agree, 39% tend to agree). However, Member States also highlighted the need for more clarity in procurement guidelines from DG TAXUD regarding permissible equipment and suppliers, including the prohibition of certain countries or companies. They indicated that more explicit guidelines from the Commission in these areas could have reduced ambiguity and ultimately improved the efficiency of the procurement process as certain suppliers could have been ruled out from the start of the process and been unable to appeal tender decisions.

A final activity which supports the delivery of the Instrument is the "meeting of experts", namely the CCEI Coordination Group (CCEI CG). The feedback on this activity was generally if not universally positive, with some suggestions for ways it could be improved. When asked whether the CCEI CG is an effective forum for collaboration, only 29% of Member State respondents "strongly" agreed, while the majority (55%) "tended" to agree, and the remainder (16%) were either neutral or disagreed. The case studies also indicated that the CCEI CG is generally seen as a positive platform for collaboration, but there were suggestions for enhancing its effectiveness by expanding its scope and establishing more specialised working groups to address specific challenges and opportunities in procurement and deployment such as specific categories of equipment (e.g. fixed scanners), innovation and AI, which could provide learning opportunities.

Extent to which synergies within CCEI are materialising in practice

One of the few "internal" synergies between aspects of CCEI which is explicitly mentioned in the Regulation is to facilitate joint procurement of CCE amongst Member States. Although the legislation does not provide a large amount of explanation or guidance on how to achieve this,

Article 6.6 states that “the Commission shall also encourage the joint procurement and joint testing of customs control equipment by two or more member states”. However, thus far, while the CCEI has not supported any joint procurement of CCE, the CCEI CG produced a deliverable (no. 5) on procurement which explored new procurement methods and encouraged joint procurement with a focus on safety, sustainability and centralised structure.

The questionnaire found that the economic benefits, such as economies of scale of joint procurement, were widely recognised, with Member States noting its value particularly for standardised equipment such as handheld scanners. However, the questionnaire also highlighted several significant barriers to joint procurement, primarily stemming from differences in national legislation and procurement procedures. In the case studies, other Member States expressed scepticism regarding highly specialised or location-specific equipment, which may be less suitable for joint procurement due to varying national needs and schedules.

Furthermore, some Member States even suggested that, compounded by a wider climate of inflation, CCEI might have had a distortionary effect on the supply of CCE given the increase in demand which the Instrument contributed to. Several Member States argued that the small number of CCE manufacturers faced strain on their supply chains from increased demand, leading to longer production lead times and further delays in the procurement process and perhaps contributing to price inflation. This further underlines the potential value of joint procurement and how competition among Member States for similar types of equipment can create challenges in the procurement process, particularly when the number of suppliers is limited and when specific security or technical requirements need to be met.

To increase the feasibility of this important synergy, many Member States emphasised the need for a harmonised legal framework and standardised processes at the EU level to address these discrepancies. A Member State cited examples like the EU’s COVID-19 vaccine procurement as a successful model of centralised coordination, with suggestions that the Commission or dedicated CCEI staff could manage joint procurement processes. A pilot project demonstrating feasibility and benefits was also proposed by another Member State as a starting point to build confidence and align efforts.

In addition to joint procurement, there also has been a lack of progress with standardisation and data sharing between Member States, though this is analysed in EQ 1.

Summary response

The Customs Control Equipment Instrument demonstrates internal coherence and potential for synergies under a delivery model that is primarily focused on direct financial support through grants for customs control equipment. While the CCEI's activities are not as varied as other EU programmes, its direct co-financing approach covers six eligible purposes, which are complementary and align with Member States' needs. Furthermore, the fact that demand and expenditure between Labs and BCPs has been marginally different to originally envisaged in the 2021-2022 MAWP (which foresaw an 80/20% split of the funding between BCPs and Labs), indicates that this aspect is complementary and coherent though a larger share for BCPs could increase the internal coherence of the Instrument. The support from DG TAXUD, including technical and administrative assistance, is highly valued by Member States, despite some administrative burdens. However, there is a need for clearer procurement guidelines from the Commission regarding permissible equipment and suppliers. The CCEI Coordination Group serves as a collaborative platform, though there is room to enhance its effectiveness through specialised working groups. Regarding synergies, joint procurement is recognised for its economic benefits, but barriers such as differing national legislation and the limited number of suppliers hinder its full realisation. Some Member States suggest a harmonised legal framework and standardised processes at the EU level to facilitate joint procurement, drawing parallels to

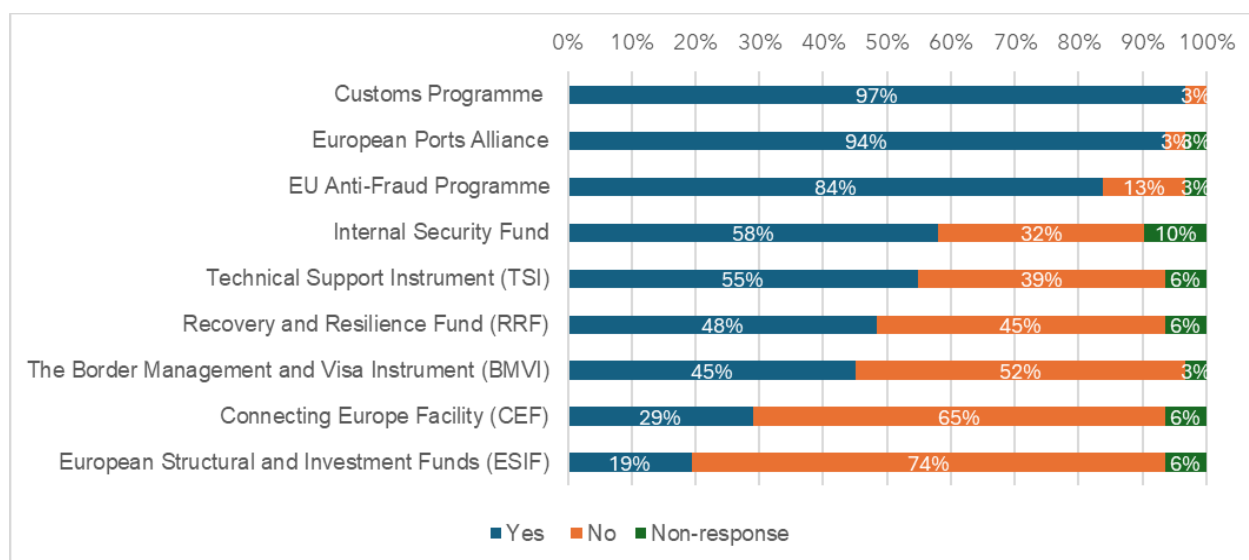
successful models like the EU's COVID-19 vaccine procurement. Ultimately, the CCEI's principal activities are very coherent but potential synergies for joint procurement, standardisation and data sharing have not been exploited thus far.

EQ 12. *To what extent is CCEI coherent with relevant Customs Union and wider EU policies, programmes, funds and instruments, and maximising synergies in practice?*

In contrast with the internal coherence of the Instrument, which is straightforward to evaluate due to the relative simplicity of the delivery model, Commission documentation consistently emphasises the CCEI's external coherence and the importance of the interconnectedness with other policies and programmes in Customs and beyond.

As stated in the CCEI's 2023-24 MAWP, "the CCEI programme will continue feeding into the wider Commission agenda and will create synergies with other Union programmes, such as the EU Anti-Fraud Programme, the Border Management and Visa Instrument (BMVI), the Internal Security Fund (ISF), the Recovery and Resilience Facility (RRF), Horizon Europe, and the Technical Support Instrument (TSI). Complementarities with these programmes are very much encouraged and will ensure the Union added value of the CCEI". This EQ will analyse these complementarities firstly with the Customs Programme followed by numerous other policies and programmes. The EQ will first look at the theoretical complementarities which the Commission is trying to achieve before, using figure below, highlighting Member States' awareness of these linkages, before examining evidence of concrete practical overlaps or synergies.

Figure 254: Responses to the questionnaire Q3.6: "The CCEI aims to complement a number of other sources of EU funding, several of which are listed below. Can you indicate whether you / colleagues working with the CCEI are aware of these initiatives?"



Source: Questionnaire responses from national customs administrations.

Extent to which CCEI is coherent with EU customs policy and wider policy priorities

Wider EU customs policy is covered extensively in the relevance EQ which finds that the Instrument is relevant to the broader objectives of customs policy, thus implying a high level of coherence with them. Instead, the analysis below covers the coherence with the Customs Programme. The Customs Programme is an EU funding programme which, inter alia, aims to foster cooperation amongst Member State Customs Authorities. As the 2023 Annual Progress Report explains, the CCEI has a "specific focus" of funding the purchase of equipment while

“complementing and supporting actions” such as training and knowledge exchange activities are supported by the Customs Programme.

This distinction has helped to clearly demarcate the types of activities which should be carried out under each Instrument, reducing the possibility of overlap. This is reinforced by the Regulation which stipulates that “an action that has received a contribution under the Instrument may also receive a contribution from the Customs programme or from another Union programme, provided that the contributions do not cover the same costs”. In practice, almost all of the Member State questionnaire respondents (97%) were aware of the Customs Programme, suggesting that this complementarity and the respective functions of the two policies are clear to nearly all of the Member States.

Furthermore, several responses highlighted specific synergies between the CCEI and aspects of the Customs Programme, such as trainings, meetings, and expertise sharing bodies like CLET, CLEN, and CELBET.

- There is evidence of some synergies with the Customs Laboratories Expert Team (CLET). The CCEI complements this by enhancing operational cooperation and analytical capabilities within the customs laboratories across the European Union. By funding new equipment, the CCEI bolsters CLET's ability to support the EU's customs laboratories, thus harmonising the Union's customs control functions. Synergies with CLET through experience and knowledge exchange was mentioned several times by Member States in the questionnaire.
- Similarly, the Customs Laboratories European Network (CLEN) was established in 1999 to promote coordination, knowledge sharing, and resource optimization amongst Customs Labs aligning it closely with CCEI's objectives. Furthermore, Commission documentation describes collaboration between the CCEI Coordination Group and the CLEN, which through practical workshops and bilateral study visits, have facilitated the sharing of best practices and expertise. These efforts, also mentioned in the questionnaire, collectively enhance the EU's customs capabilities, particularly in employing advanced techniques.
- Finally, according to the responses to the questionnaire which also asked respondents to provide concrete examples of synergies, the CCEI is also aligned closely with the Customs Eastern and South-Eastern Land Border Expert Team (CELBET) through consistent collaboration and shared objectives. Per the interview with a CELBET representative, the body reportedly maintains regular discussions with the CCEI CG, ensuring that topics related to CCEI remain a permanent agenda item in their meetings, fostering ongoing alignment and shared priorities. This synergy is further strengthened by CELBET's effective network among Member State experts, which facilitates seamless communication and support, especially during the CCEI funding application process. Additionally, CELBET contributes to the CCEI procurement process by providing a comprehensive library of model technical specifications. CELBET's activities, such as BCP diagnostics, procurement, training, and exchanges of images, complement CCEI's objectives, especially in strategic border crossing points impacted by geopolitical tensions, like the Ukraine crisis. This coordination supports the EU's policy priority on mitigating international conflicts, as outlined in the 2023-2024 CCEI MAWP, and enhances the implementation of sanctions and humanitarian aid processes.

Extent to which CCEI is coherent with other EU programmes, funds and instruments

In addition to the Customs Programme, the Commission aims to achieve complementarities between the CCEI and several other key EU programmes, funds and instruments.

The Border Management and Visa Instrument (BMVI), together with the CCEI, makes up the two strands of the Integrated Border Management Fund (IBMF). Much like the Customs Programme, both of these financial instruments operate at the external borders but their scope is different, with BMVI focusing on the control of persons crossing the external borders as well the wider concept of European Integrated Border management. The legal basis of both the CCEI and BMVI allow for financing equipment – under certain circumstances – for the purposes of the other policy domain. However, with only 45% of respondents (typically national CCEI coordinators) to the Member State questionnaire indicating an awareness of the BMVI, the level of complementarity and synergies are still developing. Despite both funding instruments being the two components of the same fund, there are no overlaps as the different objectives and implementation approaches naturally reduce the potential of collaboration between the two programmes. This is primarily due to the differences between control of goods (CCEI) and of persons (BMVI).

Another programme which demonstrated high awareness levels in the evaluation questionnaire is the European Port Alliance, with 94% of respondents indicating awareness. This initiative was set up to combat drug trafficking and organised crime and is named specifically in the MAWP as an initiative which CCEI can contribute to in addition to other strategies such as the EU Strategy to tackle Organised Crime 2021-2025, the EU Agenda and Action Plan on Drugs 2021-2025, the 2020-2025 EU Action Plan against firearms trafficking, the EU Action Plan against trafficking in cultural goods. In addition to the high level of awareness of the EPA amongst Member States, there is evidence of synergies with the priorities of the EPA (drugs and drug precursors) being explicitly integrated into both the 2023-2024 CCEI MAWP and the objectives of the second call. Furthermore, Member States indicated that they had visited major European ports and been able to exchange best practices through the Programme.

Furthermore, the CCEI and the EU Anti-Fraud Programme overseen by OLAF demonstrate a clear complementarity, effectively addressing distinct yet interconnected objectives within the EU's broader security and customs framework. With 84% of respondents indicating awareness, some MS also indicated complementarities as they can receive funding for elements that are not covered by CCEI but complement the equipment procured under CCEI (e.g. videorecorder, IT-equipment, or vehicles). Before the establishment of the CCEI as a standalone instrument, OLAF's programme was instrumental in supporting beneficiaries seeking funding for border equipment. According to interviews with OLAF staff, with CCEI's inception, many funding requests transitioned to this new instrument, allowing the Anti-Fraud programme to reallocate resources to support other beneficiaries (e.g. other law enforcement agencies). This shift highlights the distinct target groups of the two programmes: CCEI focuses on customs control needs, while the Anti-Fraud Programme broadens its support to include various law enforcement sectors.

The CCEI also has the potential for synergies with other major EU funding programmes, with 55% of MS indicating awareness of the Technical Support Instrument (TSI) and 48% for the Recovery and Resilience Facility (RRF). As set out in the MAWP, the CCEI is aligned with these two programmes in the sense that CCEI can complement broader RRF and TSI projects aimed at improving customs administrations. Based on the 2023-24 MAWP, there is complementarity in the areas of enhancing cybersecurity, interoperability, and interconnectivity among Member States with the equipment financed through the CCEI contributing to the objectives of these programmes. There is significant potential for synergies with these programmes as they can fund aspects of customs control, most notably infrastructure improvements, that stakeholders have repeatedly reported that they would like to be eligible under CCEI. One questionnaire response noted the potential use of funds allocated through RRF for the infrastructure necessary to install and operate equipment purchased through CCEI.

Despite this potential, investments to complement CCEI funding with infrastructure improvements have been seemingly limited with few examples highlighted in the questionnaire and the interviews suggesting that these alternative funding sources could benefit from greater awareness.

The CCEI and Horizon Europe, the EU's research and innovation framework programme, have demonstrated a number of synergies in customs-related innovation. To prevent funding overlaps, DG TAXUD, alongside DG HOME and DG RTD, oversees this collaboration by reviewing Horizon work programmes and encouraging Member States to link CCEI projects with EU-funded research. Horizon Europe funds innovative projects that align with CCEI's objectives, facilitating the integration of new technologies into customs operations across the EU. This includes projects like the Pan-European Network of Customs Practitioners (PEN-CP) and the Parcel and Letter Security for Postal and Express Courier Flows (PARSEC), which aim to enhance security and operational capabilities in customs and foster innovation in EU customs and border management, among many others.

Despite an awareness of just 29% amongst Member States, the CCEI also demonstrates synergies with the Connecting Europe Facility (CEF), particularly through invitations to submit proposals for projects aimed at enhancing safe and secure mobility. In 2023, a EUR 100 million call was launched to develop infrastructure at strategic border crossing points (BCPs), areas that are ineligible for CCEI funding. This complements previous efforts in 2022, where CEF funding supported infrastructure improvements for the Solidarity Lanes with Ukraine. These initiatives exemplify a collaborative framework where the CEF enhances BCP infrastructure while the CCEI provides additional security equipment, collectively boosting capacity and efficiency at strategic locations.

Finally, the interviews indicated that, while there is no direct coordination, the CCEI is aligned with the World Customs Organisation, particularly the integration of non-intrusive inspection standards.

Extent to which synergies between CCEI and other initiatives are materialising in practice. Extent to which equipment purchased is shared with and supports the work of other border authorities.

While there is little overlap between the CCEI and other EU initiatives, there is also limited evidence of meaningful synergies and multiplier effects. From the questionnaire, it should be noted that a number of respondents pointed out that they would not be aware of synergies or overlaps because the listed EU initiatives are generally handled by other officials in their national authorities. The Estonian official stressed that the exploitation of synergies could potentially be improved by working on clearer communication channels, a wider sharing of best practices, or streamlining efforts in terms of timelines, objectives, and criteria across the different initiatives. Finally, there is also a coordination mechanism established between the CCEI, OLAF, and DG HOME which plays a crucial role in minimising overlaps and ensuring that the synergies between these programmes are leveraged. This coordination helps maintain a strategic focus on shared objectives, such as enhancing the EU's integrated border management capabilities.

The overall efficacy of the CCEI's synergies with other programmes like the Border Management and Visa Instrument (BMVI) is still developing. Enhancing these synergies will require more streamlined data collection methods, improved coordination among DGs, and potentially integrating some CCEI activities into broader customs initiatives under the proposed EU Customs Reform, which aims to centralise and optimise customs operations across the Union. With increased awareness of the BMVI amongst CCEI coordinators as well as

collaboration through joint activities, synergies and progress towards achieving the objectives of both programmes is more likely.

Finally, one of the key elements of the CCEI Regulation Recital 26 for the evaluation was to explore the extent to which the CCEI is shared with other border authorities both within and between Member States. The responses to the questionnaire about the sharing of equipment financed under the Customs Control Equipment Instrument (CCEI) with other border authorities highlight several key points.

Firstly, many Member States have not yet shared equipment financed under the CCEI with other border authorities. This is often due to the specific nature of the equipment, which is tailored for customs use and requires trained personnel for operation. The equipment, such as X-ray machines and other detection tools, is often just used by customs administrations as these specialised items are limited in their usefulness elsewhere outside the customs mandate.

However, there are examples where cooperation does occur. In Spain, for instance, baggage X-ray machines are operated by the Guardia Civil in customs areas, demonstrating some level of inter-agency collaboration while Romania conducted joint risk analyses with other authorities under a government ordinance. Some Member States have agreements in place that allow other state authorities like police or consumer protection agencies to benefit from the equipment through mutual agreements. While sharing between Member States seems to be almost non-existent, the questionnaire found that, upon request of DG TAXUD, and within the framework of Cyprus Maritime Corridor, the Italian Authorities lent Cyprus a scanning equipment from July 2024 to March 2025. However, legal and practical barriers also play a significant role in limiting equipment sharing. In Greece, for example, a separate legal agreement would be required for co-sharing between Member States, which can be a lengthy process highlighting the need for streamlined legal frameworks to facilitate inter-agency collaboration.

In summary, while there is potential for the shared use of equipment, it is often limited by the equipment's specialised nature and the operational requirements of customs authorities. Nonetheless, the examples of cooperation and openness to future collaborations suggest pathways to enhance inter-agency synergy and maximise the utility of customs control equipment.

Summary response

The CCEI is coherent and complimentary with both the Customs Programme and several others highlighted above. Stakeholders are aware of the Customs Programme and, in several instances, have enjoyed the synergies between the two programmes through trainings, meeting and sharing of best practices. There is also considerable potential for synergies with other programmes such as the TSI and RRF which could provide funding for key needs (such as infrastructure and IT systems) which stakeholders would like to be included in the CCEI. However, there is a distinct paucity of actual examples of these synergies notwithstanding the Anti-Fraud Programme which has funded equipment which is not eligible under CCEI but very useful to Member States.

The need for external coherence with various EU policies, programmes, and funds was considered and built into the design of the CCEI, emphasising the importance of interconnectedness. The CCEI aligns with other EU programmes such as the EU Anti-Fraud Programme, the Border Management and Visa Instrument (BMVI), and others, aiming to complement these through synergies and reduce overlaps. The CCEI's focus on funding equipment is distinct from the Customs Programme, which handles training and knowledge exchange, ensuring clear demarcation and preventing overlap. Member States have noted synergies with initiatives like the Customs Laboratories Expert Team (CLET) and the Customs Laboratories European Network (CLEN), enhancing operational cooperation and analytical capabilities.

The CCEI aligns with several EU programmes, though awareness and implementation of synergies vary. The CCEI, along with the Border Management and Visa Instrument (BMVI), forms part of the Integrated Border Management Fund, allowing potential resource sharing, although awareness and synergy levels are currently low. High awareness exists for the European Port Alliance, which aligns with CCEI's objectives against organised crime. The CCEI complements the EU Anti-Fraud Programme, with distinct target groups, enhancing resource allocation across border and law enforcement needs. The insight that equipment that was not eligible to be funded under the CCEI but nonetheless very complimentary to the list of CCE was an example of a synergy that could potentially be replicated. Despite synergy potential with the Technical Support Instrument and Recovery and Resilience Facility for infrastructure improvements, current integration is limited. The CCEI and Horizon Europe collaborate on customs innovations, while the Connecting Europe Facility complements infrastructure at strategic border points. Coordination with the World Customs Organisation further supports non-intrusive inspection standards. Enhanced communication and harmonised processes across initiatives could improve synergy exploitation.

Equipment sharing with other border authorities within and between Member States is limited due to the specialised nature of the equipment and legal barriers. However, instances of cooperation, such as Spain's use of baggage X-ray machines by the Guardia Civil and Cyprus's temporary borrowing of scanning equipment, indicate potential for enhanced inter-agency collaboration. Streamlined legal frameworks and improved coordination could foster greater synergy and maximise the benefits of customs control equipment.

EU Added Value

Table 18: Evaluation matrix for EU added value

Evaluation questions	Judgment criteria	Indicators	Data sources
13. What has been the EU added value of the CCEI compared to what could be achieved by the MS at national level?	Extent to which CCEI funding has been additional and leveraged national funding (rather than replacing national funding), cost savings and/or economies of scale generated	Summary of key findings from relevance, effectiveness and efficiency Role of CCEI in helping the MS to achieve value for money in the purchase of customs control equipment Evidence / examples of the state of play compared to a situation if no CCEI funding had been available	<ul style="list-style-type: none"> Answers to other evaluation questions Stakeholder interviews MS questionnaire responses In-depth case studies
	Extent to which the CCEI has created opportunities for customs authorities to act as one, e.g., through increased collaboration, data sharing and interoperable and mobile equipment	Summary of key findings from relevance, effectiveness and efficiency Role of CCEI in fostering collaboration and data sharing Evidence / examples of the state of play compared to a situation if no CCEI funding had been available	<ul style="list-style-type: none"> Answers to other evaluation questions Stakeholder interviews MS questionnaire responses In-depth case studies
	Extent to which the CCEI has enabled the MS to address mutual challenges, e.g., joint procurement, co-sharing, testing, innovation	Summary of key findings from relevance, effectiveness and efficiency Role of CCEI in addressing mutual challenges Evidence / examples of the state of play compared to a situation if no CCEI funding had been available	<ul style="list-style-type: none"> Answers to other evaluation questions Stakeholder interviews MS questionnaire responses In-depth case studies
	Extent to which the CCEI led to unexpected effects (positive or negative)	Evidence / examples of unexpected benefits (e.g. safety and health benefits for users of the purchased equipment, greener equipment) Evidence / examples of any unintended negative consequences, such as substation effects of equipment that would have been purchased anyway	<ul style="list-style-type: none"> Answers to other evaluation questions Stakeholder interviews MS questionnaire responses In-depth case studies
14. How could the CCEI be better exploited to add value in the context of the EU Customs Reform?	Extent to which CCEI has untapped potential	Steps taken / planned towards facilitating joint procurement Possible interactions / synergies between CCEI and a future EU Customs Agency and / or Data Hub	<ul style="list-style-type: none"> Answers to other evaluation questions Stakeholder interviews MS questionnaire responses In-depth case studies

EQ 13. *What has been the EU added value of the CCEI compared to what could be achieved by the MS at national level?*

This question hinges on the ‘additionality’ of the CCEI, meaning the extent to which it not only is addressing real needs and making progress towards its objectives (assessed under relevance and effectiveness, respectively), but also catalysing achievements that would not have been possible through other means. The assessment focuses on the additionality of the equipment purchased, cost savings, taking advantage of opportunities for customs authorities to act as one, enabling of customs authorities to address mutual challenges, and any unexpected effects. Aside from synthesising the relevant elements from other evaluation questions, the various data collection tools also contained dedicated questions on additionality; the in-depth case studies are particularly important in this respect, since these allowed for exploration of what would have happened in specific situations without CCEI funding.

Extent to which CCEI funding has been additional and leveraged national funding (rather than replacing national funding)

As noted in EQ 1, the two CCEI calls to date have led to the allocation of over EUR 550 million of EU funding, which has already been or is expected to be used for the purchase of customs control equipment. However, to be truly ‘additional’, the EU funding needs to be used for purchases that would not have been possible from national budgets or other sources. Since the evaluation lacked access to data on national budgets or decision-making processes, the assessment is based largely on the grant documentation and input from stakeholders.

In the first instance, an imbalance in the financial resources available for customs control equipment was a frequently raised issue during the evaluation. For example, nearly 80% of customs authorities responding to the questionnaire cited this as a ‘very’ (48%) or ‘quite’ (29%) important issue. This concern was echoed in the open replies, with several Member States identifying financial imbalances as a critical problem, since ‘the Customs Union is only as strong as its weakest link’. Many interviewees from customs authorities, European institutions and international organisations expressed a similar view. The implication is that many customs authorities would not have been able to mobilise the resources needed for adequate customs control equipment without outside funding.

That said, it also bears mentioning that, in their applications under the first and second calls, customs administrations were not required to demonstrate a need for financial support as such. Rather, funding could be awarded as long as the equipment itself was needed, regardless of whether customs authorities had the means to purchase the equipment anyway.

From this it follows that levels of additionality would be expected to differ depending on the circumstances and needs of individual customs authorities. This indeed appears to be the case, with the Member States falling broadly into two groups. The first group is comprised of countries for which CCEI funding clearly enabled (or is in the process of enabling) purchases of customs control equipment that would not have been possible from other sources. The questionnaire results suggest that most Member States fit this description. Almost two thirds (61%) of respondents reported that, without the CCEI, their customs authorities would not have been able to purchase the requested equipment. Only 9% were of the opposing view, while the remaining 29% were either neutral, unsure, or didn’t respond. High levels of additionality were also evident in six of the ten case studies of specific grants, namely Belgium, Croatia, Estonia, Finland, Poland and Romania.

Among the grants demonstrating high levels of additionality, a unifying theme was of significant equipment needs combined with lacking resources at national level. All but one of the case study grants in this category possess important land borders with third countries, while the other (Belgium) is the site of one of the EU’s largest container ports. Four of the grants were also among the largest from the first call in terms of monetary value; the other two were for Estonia and Croatia, both small Member States. Customs authorities in all six of these countries emphasised urgent needs, e.g., due to continued reliance on equipment that was obsolete and / or had exceeded its expected lifecycle. It is also telling that these six grants were all subject to delays. While negative from an implementation perspective, this seems correlated with high levels of additionality (albeit indirectly and perhaps counterintuitively), because Member States that dared to go outside their comfort zones with ambitious funding requests frequently experienced difficulties to put these plans into action. Still, despite timescales that were longer than expected, the case studies provide compelling evidence that these grants will ultimately lead to the purchase and deployment of equipment that would not have materialised otherwise.

In contrast, the other four of the case studies – Austria, Italy, the Netherlands and Spain – covered equipment needs that national officials admitted would have been met regardless of the CCEI. The specific circumstances differed to a degree; for example, in some cases the CCEI funding was simply used to help implement equipment modernisation plans that had already been approved and launched. In other cases, the availability of EU funding allowed customs authorities to speed up / bring forward equipment purchases that might have been spread out over a few years. Given the importance of maintaining a high level of control at all times, the role of the CCEI in allowing these Member States to deploy needed equipment more quickly is also a form of additionality that should not be underestimated. In this respect, it is worth pointing out that only one of the four grants in this group was delayed.

Of course, the picture is not fully black and white. For example, customs authorities from several Member States explained that, even if they would have been able to purchase the requested equipment without EU co-funding, the CCEI served to elevate customs control equipment on the political agenda, incentivising customs to strive for more ambition and ‘protecting’ against budget cuts. On the other hand, as discussed in EQs 1 and 9, not all purchases enabled by the CCEI have addressed the most urgent needs and priorities of the Customs Union. In such cases, the equipment may have been ‘additional’ without achieving the maximum added value that could have been achieved with the funding.

Extent to which the CCEI has generated cost savings and / or economies of scale

In principle, the CCEI could also generate EU added value by saving money for the Member States. Several pathways to these savings could be foreseen. At a basic level, the CCEI Coordination Group aims to serve as a forum for pooling knowledge on customs control equipment and on procurement, which could help the Member States to develop tender specifications and run procurement processes more efficiently. Increased standardisation, if achieved, could also reduce the costs charged by suppliers, while joint procurement would aim, *inter alia*, to give purchasers more bargaining power and drive down costs.

In practice, the first of these pathways seems to have been materialised. Asked in the questionnaire about whether the CCEI Coordination Group is an effective forum for collaboration, the vast majority either ‘strongly’ (29%) or ‘tended to’ (55%) agreed. In the interviews, several customs authorities further explained that the expertise, advice and templates / sample material shared in the Coordination Group served to reduce costs at national level for the drafting of tender specifications, management of procurement processes, and dealing with suppliers. This was especially appreciated by smaller Member States, which lack in-house capacity. Aside from saving time in the first instance, this also meant decreased chances of unsuccessful procurements and litigation. In addition, the more targeted approach of the second call for proposals, which included specific recommendations to Member States and increased guidance in areas like security specifications, was seen as a further step forward. However, the scale of these types of savings has been limited because they have not affected in any fundamental ways the processes for procuring and deploying customs control equipment, which are where most costs are incurred.

Turning to the savings that could potentially result from either standardisation of equipment or joint procurement, these remain largely unrealised. Regarding standardisation, although many questionnaire respondents (55%) agree that this is occurring through the CCEI, no interviewees felt that it was helping to obtain lower prices. For its part, joint procurement is permitted in the CCEI Regulation and has been a topic of discussion in the Coordination Group and of a study procured by DG TAXUD, and many officials responding to the questionnaire and taking part in interviews have mooted its future promise, especially for less tailored types of equipment like handheld scanners. The potential benefits from central purchasing by the Commission, if

facilitated by the proposed EU Customs Reform, also attract considerable enthusiasm. However, these benefits remain theoretical in the absence of any concrete attempts to actively promote or enable joint procurement at this stage.

Extent to which the CCEI has created opportunities for customs authorities to act as one

In light of the EU's common external border, a key part of the mission of EU customs is for the 27 customs authorities to increasingly act as if they were one. The CCEI specific objective envisages progress towards this mission through enabling purchases of customs control equipment, which in turn aim to reduce disparities between Member States and contribute to achieving a uniform level of control.

As discussed under EQ 1, the CCEI has been progressing towards its objectives relatively effectively, albeit slowly, due mainly to problems and delays experienced with national procurement processes. Still, this was attributed to external factors rather than design flaws in the CCEI. Encouraging early results were noted, alongside beneficiaries' confidence that the CCEI will make a significant contribution over time to its objective of achieving adequate and equivalent results of customs controls. This is a positive finding, though, as discussed under additionality, it could be questioned whether CCEI funding is always used to maximum effect, while most impacts are still yet to emerge.

In theory, the CCEI could also foster other opportunities for customs authorities to act as one, such as through increasing cooperation between customs authorities, standardisation of customs control equipment, and sharing of data and actual equipment. On the first of these, the CCEI Coordination Group has become a key forum for exchange on matters concerning customs control equipment, as noted above (though other fora such as CELBET and CLEN also play important roles in this respect). Almost half of questionnaire respondents (49%) also agreed that the CCEI had led to more practical cooperation between customs authorities. As mentioned above, nearly two thirds (55%) also felt that the CCEI had led to increased standardisation of the equipment.

However, when it comes to operational collaboration, examples of impact are extremely limited. Just 26% of questionnaire respondents agreed that the CCEI had led to more data-sharing, of which only 10% 'strongly'. Despite the role of EU co-funding and a general enthusiasm to work more together, the bottom line is that decisions on the equipment to be purchased and its use are made overwhelmingly in the national arena. This is in line with the implementation modality of the CCEI, which relies on the Member States to procure the equipment, and policy on customs controls more broadly. In this regard, interviewed officials expressed little awareness for how data or equipment could be shared or the legal and practical protocols for doing so. Cybersecurity concerns and closed IT environments were also mentioned as obstacles, as was (by fewer customs administrations) the ineligibility for CCEI funding of IT infrastructure, which in principle could be used to build and maintain connections for sharing data between countries. More positively, as discussed in EQ 14 below, questionnaire respondents and interviewees also pointed out that ongoing policy developments could help bring a more European character to the environment for customs control equipment, namely if the proposed EU Customs Reform leads to the establishment of an EU Customs Agency and EU Data Hub.

Extent to which the CCEI has enabled the Member States to address mutual challenges

As noted in the previous two judgement criteria, the Member States have generally been using the CCEI to purchase equipment that is genuinely needed. The CCEI has also been making progress towards its specific objective, the pace of which is expected to increase over time as more and more equipment is purchased and deployed. Since the challenges faced by individual Member States are by definition also challenges facing the Customs Union, the CCEI can be said to be adding value in this regard.

However, it should also be emphasised that the CCEI's relatively bottom-up, open approach has given the Member States significant discretion to decide on which equipment priorities to pursue. This was particularly true of the first call for proposals, which focused on countries' short-term priorities; the second call targeted specific policy priorities, while the Member States also had to take into account individual recommendations from DG TAXUD in their grant applications. Still, both calls were open to all Member States (vast majorities of which chose to participate in each case) rather than, say, priority countries or BCPs. Moreover, even for the second call, the priorities were sufficiently broad such that most types of eligible equipment could reasonably be justified. In contrast, the CCEI expressly did not dictate in a top-down manner which equipment should be purchased and where it should be deployed. Moreover, as explained in the first judgement criterion, the additionality of the funding varied, with some purchases being truly dependent on the EU funding and others that would have taken place anyway.

Leading from this, it is difficult to determine the appropriate amount of steering and prescriptiveness. On the one hand, a more centralised, top-down approach could in principle result in a more efficient allocation of resources and better address the challenges facing the Union as a whole. On the other hand, the national competence for customs controls limits the amount of steering that would be politically and legally feasible, and providing all Member States with the opportunity to take part helps ensure wide support for the instrument. Since DG TAXUD lacks comprehensive and accurate data on existing equipment deployments and needs, it would also be difficult to take all decisions at EU level. A balance probably needs to be struck, and the second call looks like a step in the right direction, even if somewhat more prescriptiveness would probably be desirable, as argued in EQ 1.

Aside from setting priorities for the equipment to be purchased, there are other areas where the CCEI could have gone further to help the Member States address common challenges. A particular concern has been procurement. Combined with cybersecurity risks, questionnaire respondents and interviewees repeatedly singled this out as a problematic area which, due to limited capacity and expertise, frequently led to delays, litigation, cancellations and relaunched procurements, etc. More guidance and potentially requirements in this area would have been appreciated and increased the added value of the instrument. In the area of innovation, aside from encouraging and allowing the purchase of innovative equipment, the CCEI's role in spurring progress seems to have been limited. A similar situation has prevailed for joint procurement, which, as mentioned above, has been discussed extensively in the CCEI Coordination Group and been the subject of a dedicated study, but not yet been attempted within the frame of the programme.

Extent to which the CCEI led to unexpected effects (positive or negative)

The CCEI is a relatively straightforward intervention in that it has one main activity, which is the provision of financial support for the Member States to purchase, maintain and upgrade customs control equipment. This simple structure limits the scope for unexpected effects, very few of which were identified in the evaluation, either positive or negative.

Of those that could be found, the main ones were negative and relate to the relative flexibility of the instrument. As noted above under additionality, Member States need to justify the need for the requested equipment, but not for the funding as such. In some cases, this has led to the 'mere' displacement of national funding, which is obviously not the intention of the CCEI. Similarly, once a grant has been awarded and signed, Member States are able to request significant changes to the equipment to be purchased without adjusting the monetary amount of a grant. While it is important for customs authorities to be able to adapt plans to shifting circumstances, customs authorities may face an incentive to retain the secured funding, which in some cases appears to

lead to outcomes unrelated to the original funding application. For example, one case study involved a large grant that was originally intended for the purchase of equipment for several land borders with Russia that, though formerly busy, were subsequently closed due to the war in Ukraine. Rather than revising the grant amount downwards, the funds were redeployed to other BCPs in the same country, where the needs may not have been as great. These examples add to the point above in implying that the instrument would be better served in shifting the balance between flexibility and prescriptiveness / control towards the latter, at least to a degree.

Summary response

It was assessed to what extent the CCEI has added value beyond what the Member States could achieve on their own. The first and perhaps most fundamental judgement criteria is additionality, meaning whether the funding leveraged rather than replaced national funding. Given that grant applications needed to demonstrate a need for the equipment rather than for the funding as such, and that the availability of resources differs by country, it would be expected that levels of additionality would also vary. This turned out to hold in practice: the questionnaire results and case studies showed that most customs authorities would not have been able to make the purchases of the funded equipment without the CCEI, with especially high additionality among countries facing significant needs combined with a lack of resources. However, there were also examples where customs authorities would have gone ahead anyway, either on the same schedule or with a longer time frame. Such examples were relatively rare and still helped elevate customs control equipment on the political agenda, leading to higher levels of ambition and reducing risks of future budget cuts.

The ability of the CCEI to generate cost savings and / or economies of scale was also examined. The CCEI Coordination Group has enabled such savings to a certain extent, by pooling expertise in a way that helps national customs authorities – especially those with limited capacity – to reduce costs for drafting tender specifications, managing procurement processes and dealing with suppliers. However, the greater savings that could be hoped for from standardising equipment or joint procurement remain to be realised.

To some extent the CCEI has created opportunities for customs authorities to act as one, most notably through the progress made towards its specific objective of enabling purchases of customs control equipment, which in turn reduces disparities between Member States and increases the uniformity of controls. The CCEI is also fostering increased cooperation between customs authorities and increased standardisation of equipment. However, operational collaboration still appeared limited, particularly regarding the sharing of data or actual equipment.

Regarding the CCEI's role in helping the Member States to address mutual challenges, progress towards its specific objective also implies added value in this area, since the challenges faced by the Member States also affect the Customs Union. However, it was also found that the CCEI's bottom-up approach, has the disadvantage of not necessarily steering funding to the equipment and locations where the Customs Union (rather than individual Member States) is in most need. The CCEI could also potentially have provided more guidance in the field of procurement, for which many customs authorities faced problems that led to delays and extra costs. Joint procurement and innovation are also areas of untapped potential.

Finally, regarding unexpected effects, the relatively simple structure of the CCEI has served to limit the scope of these. The only notable exceptions relate to the flexibility of the instrument. In some cases this has allowed the funding of projects that are not additional but rather replaced national resources, as noted above. In addition, the ability to revise the equipment to be purchased during the lifetime of a grant, without changing the amount, may in some cases have led to purchases where needs were not sufficiently great.

EQ 14. How could the CCEI be better exploited to add value in the context of the EU Customs Reform?

Unlike the other evaluation questions, which have looked backward to assess the CCEI during its first years of operation, this last question is about the future. More specifically, it considers how the CCEI could be better exploited to add value in light of the EU Customs Reform, an ambitious proposed initiative that aims to further harmonise customs practice in the EU and make it more risk-based and data-driven. The question is necessarily hypothetical in nature, since the reform was still under negotiation as of May 2025, and its provisions are not scheduled to apply until after the current programming period.³⁸ Nonetheless, it is useful to reflect ways in which the CCEI could potentially add more value once the envisaged changes are in place.

As a starting point, it is worth recalling some of the CCEI's main shortcomings and areas of limited progress to date. These include a lack of targeting, insufficient procurement guidance and limited use of the programme to foster standardisation, innovation, data sharing and operational collaboration. On top of this, joint procurement, though seen as a potential avenue for further progress in all of these areas as well as a way to improve customs authorities' bargaining power and increase efficiency, is still in its infancy.

Of the wide range of legislative and procedural novelties envisaged in the EU Customs Reform, a review of the legislation and accompanying legislation, as well as feedback from stakeholders, suggests that three of these in particular could be harnessed to address the CCEI's existing problems. These are briefly described below, in terms of the nature of the changes compared to the current situation, and the potential implications for the CCEI (or a successor instrument) in the future:

- Harmonisation of customs risk management: under the current Union Customs Code risk management and controls are largely the responsibility of national customs authorities, especially for non-financial risks, based on the national risk frameworks and risk engines used to target controls. The Customs Reform will change this by introducing provisions by which all Member States will have access to real-time data and will be able to pool information to respond more quickly, consistently and effectively to risks and introducing a new strengthened risk management framework, which will be based on a common prioritisation of risks for the whole EU, a mechanism for increased operational cooperation.
 - In practice, more consistency will be needed in the arena of customs control equipment, regarding e.g., increased standardisation, the sharing and / or pooling of data, and interoperability and coordination between customs authorities conducting controls. To facilitate this, the CCEI could require authorities applying for grants to purchase interoperable equipment based on common standards, and to put in place protocols for sharing the images and other relevant data produced using the equipment, and for interpreting those images (potentially assisted by AI). Such requirements could also act as an additional incentive for Member States to take steps towards joint requirements.
- Establishment of an EU Customs Data Hub: the impact assessment for the Customs Reform determined that traders currently need to submit customs data to up to 111

³⁸ More specifically, per Article 265 of the proposed legislation, the timeframe for application will see key elements – particularly the EU Customs Authority and EU Customs Data Hub – take effect on 1 January 2028, while others will progressively be rolled out until 2038.

different IT systems and to deal with the authorities in all Member States where they have operations. While interoperability between certain systems allows some of the data involved to be shared, this is seldom the case for the risk data used to target controls and images and other information produced using customs control equipment. Cybersecurity concerns and national rules and processes pose additional barriers. The introduction of an EU Customs Data hub will act as an enabler for the harmonised risk management described above, as well as making it easier for customs authorities to share information securely and thereby coordinate and mutually benefit from each other's controls.

- The Data Hub should increase the potential added value of more uniform approaches to customs control equipment, which would in turn also make it more worthwhile for the CCEI to prioritise the purchase of standardised and interoperable equipment. Increased possibilities for the pooling and sharing by means of the data hub and coordinated use of data could also spur innovation through the CCEI.
- Establishment of an EU Customs Authority: despite the nature of customs policy as an exclusive EU competence, and the increased harmonisation of rules and processes, for the most part national customs authorities have retained responsibility for implementation. The EU Customs Authority will change this by, for the first time, assigning certain customs operational tasks to a central body. Concretely, these tasks will include using the data from the EU Customs Data Hub to conduct EU-level risk analysis and make control recommendations to national authorities, and coordinating operations in the event of a crisis. Potentially, it will also take responsibility for developing and maintaining the EU Customs Data Hub and executing programmes such as future iterations of the CCEI.
 - The EU Customs Authority is likely to open the door to a myriad of possibilities for the CCEI. As a centre of expertise on many relevant matters (including technological developments and capabilities, cybersecurity and procurement practices), the authority can ensure the use of such knowledge to inform CCEI planning, and development of requirements, guidance, templates etc. Inter alia, this could include taking action to introduce standardised testing protocols, enabling more effective comparisons of equipment.³⁹ Operational staff would be able to play a coordinating role vis-à-vis national customs authorities, increasing the chance that opportunities for sharing data and collaboration are grasped. It would also be the central location for enabling the use of shared images, and for producing a reference library for both training and interpretation purposes, which would in turn help refine algorithms for risk analysis purposes. And finally, were the decision taking to further streamline the procurement of customs control equipment, encourage joint procurement or even carry out purchases centrally, the EU Customs Authority would be the natural actor to lead these initiatives.

³⁹ This would be in line with the first recommendation of a recent study carried out for DG TAXUD on customs detection technologies: European Commission (2024), *Customs control detection technologies: state-of-the-art, emerging customs control equipment and its testing*, study prepared for the European Commission by NTT Data.

ANNEX IV. OVERVIEW OF BENEFITS AND COSTS

The table below summarises the costs and benefits that can be linked to the CCEI, as identified in the evaluation. The early stage of implementation of the CCEI made it impossible to comprehensively assess the benefits. Very few projects from the first call have been completed, and the grant agreements from the second call just started at the end of 2024 and the beginning of 2025. In view of this, the interim evaluation focused on assessing the implementation of the CCEI, and documenting early outputs and emerging results to the greatest extent possible, but was not in a position to provide a systematic quantitative analysis of wider benefits at this stage.

As regards the costs, it should be noted that the table does not include the cost of the instrument itself for the EU budget (EUR 1,006 million for the period 2021-2027). Direct compliance costs (in particular administrative costs for Member States linked to application, grant management and reporting processes) were assessed by collecting data on the time spent on different relevant activities via the questionnaire for national customs administrations. Interviews were used to follow up, fill gaps and help clarify the interpretation of this data. The data was processed using the EU Standard Cost Model, and the cost estimated by multiplying the time required with the average labour cost per hour (including pro-rated overheads). Details are provided in Annex 3, as part of the response to EQ 6 (under efficiency).

Table 69: Overview of costs and benefits identified in the evaluation

Types of impacts		Citizens / consumers		Businesses		Administrations	
		Quantitative	Comments	Quantitative	Comments	Quantitative	Comments
Costs	Direct compliance costs	-	None	-	None	Approx. EUR 610,000 p.a.	Cumulative cost of the staff time spent by the customs administrations of all 27 EU MS to apply for and implement CCEI grants, and take part in CCEI management
	Enforcement costs	-	None	-	None	-	None
	Indirect costs	-	None	-	None	-	None
Benefits	Direct benefits	-	None	-	None	-	More and better CCE available at customs administrations (improved capacity) contributing to more effective and efficient customs controls
	Indirect benefits	-	Potentially a wide range of economic, environmental and social (safety, health) benefits from more effective customs controls. Customs are involved in delivering numerous regulatory policies in addition to broader safety, security and revenue collection tasks.	-	Potentially trade facilitation benefits and from more efficient customs controls	-	Protection of the financial and economic interests of the EU and its MS, ensuring security and safety within the Union and protecting the Union from illegal trade via better detection capabilities

The synopsis report presents a comprehensive summary of all consultation activities undertaken as part of this evaluation. It provides a detailed account of the outcomes from all consultation activities and seeks to inform stakeholders about how their input has been integrated into the evaluation process.

The approach to stakeholder consultations was three-pronged, consisting of (i) a written consultation of customs authorities first, complemented by (ii) in-depth interviews and ultimately by (iii) a stakeholder workshop with customs administrations to validate the preliminary findings and conclusions. These consultation activities were carried out as part of the supporting study. The evaluation was preceded by a call for evidence between June and July 2024. This took place via the EU's Have Your Say Portal and fed into the preparation of the work for the tendering of the evaluation's support study and the work itself.

Methodology

Questionnaire

The questionnaire was designed to collect feedback and evidence from customs administrations. A questionnaire was preferred to a survey under the logic that it would elicit responses on a Member State basis and enable respondents to combine input from different officials.

In order to maximise the usefulness of the questionnaire, several design features were included to minimise the burden on respondents while collecting comparable and useful data. In summary, these include:

- A mix of objective, fact-based information and more subjective input (e.g. on processes that have worked well and less well), and closed (multiple-choice) and open (free text) questions. Such an approach helped keep the questionnaire relatively brief, which is important given that responses to the questionnaire were needed before proceeding to the interviews with a sample of customs authorities;
- The use of a Microsoft Word format rather than an online form. While less sophisticated than other consultation tools, this avoided the risk that any respondents will be unfamiliar with the format, and also facilitates sharing among the different officials who may need to collaborate on the questionnaire within customs authorities;
- An emphasis on user-friendliness, with clear instructions for respondents, simple formatting (e.g. with colour-coding to distinguish question text, multiple-choice and free-text parts of the document), the inclusion of a glossary to explain the terms used, and pre-populating of certain questions to the extent possible based on the CCEI monitoring and grant data;
- An intuitive structure that corresponds to the experiences of customs officials rather than evaluation logic;
- Support to provide clarification, respond to any questions, talk through the questionnaire with any customs officials needing assistance, or even complete the questionnaire orally if any administrations lack the time to provide written input.

The questionnaire included an introduction, as well as sections on the rationale for the CCEI and the needs of MS; on participation and results so far; experiences with and views on programme

management; possible future developments; and a concluding section for Member States to provide additional remarks.

Member States received the questionnaire as an MS Word document. The questionnaire was distributed to national CCEI contact points between 6 and 7 November 2024, with a submission deadline of 4 December 2024. MS were asked to confirm receipt and their intent to respond. A follow-up was sent on 15 November to authorities that had not confirmed. Personalised reminders were sent on 5 December to those who had not submitted their responses or requested extensions. By 9 January 2025, all MS submitted at least one response, with a total of 31 completed questionnaires received from 27 MS (a few MS chose to submit separate responses reflecting the views of the officials responsible for BCPs and laboratories).

Interview Programme

The interview programme targeted several key groups in the CCE ‘ecosystem’ including representatives of (i) national customs authorities, (ii) European Commission and other EU institutions officials, (iii) relevant expert groups (e.g. CELBET) and (iv) the security and customs control industry. Targeting these four key stakeholder groups allowed the research to gather a wide range of perspectives, close gaps or expand on key elements, and discuss key issues in greater depth, and with more nuance and openness, than was possible in the responses to the written questionnaire.

In terms of the sequencing of the interviews, first five familiarisation interviews with representatives of various DG TAXUD units were conducted during the supporting study’s inception phase to collect initial feedback and insight on the instrument’s genesis, its policy context, programme management, the data model, and other relevant aspects.

This was followed by the interview programme ‘proper’, which was conducted in two ‘waves’. Wave 1, which was launched in November 2024, included interviews that were carried out to inform the case studies on ten selected CCEI projects; this entailed consulting representatives (usually several) of the implementing national customs administrations, as well as the DG TAXUD project officers who were responsible for each of the projects. In addition, wave 1 also targeted relevant Commission services (such as OLAF and the JRC), the World Customs Organization, expert groups (e.g. CELBET) and representatives of the customs control equipment industry.

Wave 2 (launched in January 2025) primarily targeted national customs authorities that were not interviewed as part of the case studies, in order to gather additional input from them and, where appropriate, follow up, clarify and expand on their questionnaire responses. In total, interviews were conducted with representatives of 14 Member States.

In total 49 interviews were conducted. The table below provides a breakdown of the interview programme outlining interviews conducted per stakeholder group. It should be noted that, in many cases, interviews involved more than one interviewee; in particular, almost all interviews carried out to inform the case studies were attended by two or more representatives of the national customs administrations in question.

Table 20: Overview of the interview programme

Main groups	Number of Interviews
National customs authorities	27*
Relevant expert groups	2
European Commission and other EU Institutions	13

Customs control equipment industry	7
Total	49

** As part of the case studies, more than one interview was carried out with a few national customs authorities. In many other cases, two or more officials took part in the same interview. The numbers above relate to the number of separate interviews conducted, not the number of participants (which would be significantly higher). All in all, interviews were carried out with representatives of the customs authorities of 24 Member States.*

Workshop

The online workshop, which took place on 26 February 2025, was an opportunity for representatives of national customs authorities to review, validate, and, where needed, refine the preliminary and emerging results of the evaluation. This “validation” workshop took place during the last phase of the supporting study, after the data collection activities and the initial analysis of the data had been completed. The online workshop was arranged and hosted by the study team on MS Teams. The agenda included:

- The presentation of the key preliminary findings
- Discussion of the findings in breakout groups
- Plenary discussion (including a summary of the main points from each breakout group and a discussion of the future of the CCEI)
- Wrap-up and next steps

In total, 40 representatives of the national customs administrations of 19 Member States attended the workshop (in addition to representatives from DG TAXUD and the study team).

Results

Questionnaire

This section provides a high-level summary of the results per theme.

Organisation of CCEI within Customs Authorities

In the introductory section on the internal organisation of customs authorities, the questionnaire delved into the rationale behind the CCEI and how the priorities of the programme align with those of national authorities.

The responses to the first question of this section shows that the pre-identified issues and challenges are generally of high importance to customs authorities within the EU. While all of the proposed issues and challenges were considered at least quite important by a majority of respondents, the greatest importance was attributed to the imbalances that exist between MS when it comes to the controls exercised at the Union’s external borders (45% considered it very important and 39% somehow important). Highly important, in the eyes of customs authorities, are also the imbalances in financial resources surrounding CCE (45%), imbalances in the administrative capacity dealing with processes around CCE (42%), and imbalances in the availability of CCE (35%). Of slightly less importance appears to be the insufficient standardisation and/or interoperability of CCE, although still 32% said it was a very important issue.

Rationale of the CCEI

The findings from the questionnaire on the rationale of the CCEI reveal several key insights into the perspectives of customs authorities within the EU. The pre-identified issues, particularly the imbalances in controls at the Union’s external borders, financial resources, administrative capacity, and availability of customs control equipment, are seen as highly important by the majority of respondents. While most authorities agree on the alignment of CCEI's eligibility

criteria with their equipment needs, some express concerns about the criteria's breadth, particularly regarding infrastructure, software, and maintenance needs not being adequately funded. Moreover, the alignment of priorities between the EU and national levels shows that general safety equipment are well-aligned, though innovation and green targets are less prioritised. Despite a positive view on CCEI's policy priorities, some authorities noted challenges in the administrative burden of data collection and the need for more user-friendly budget sheets. Additionally, there is a call for regular updates to the list of eligible equipment to incorporate emerging challenges and innovative technologies, as well as for support in the infrastructure and maintenance of CCEI-funded equipment. Overall, while there is significant alignment between national priorities and the CCEI, certain areas for improvement and adaptation remain crucial for future iterations.

Participation and results to date

The questionnaire results regarding the participation in and outcomes of the CCEI programme reveal several insights. While grants awarded in the initial call have progressed slower than expected, largely due to procurement issues and national political factors, the role of DG TAXUD is not cited as a cause. Some Member States highlighted timing and procedural challenges as reasons for non-participation in early calls. Satisfaction with TAXUD's support is generally high, yet obtaining national co-funding and ensuring adequate human resources remain significant hurdles. Although the equipment funding aligns well with CCEI priorities, procurement processes at the national level face challenges, especially concerning the exclusion of certain third-country providers. The programme's emphasis on secure and environmentally friendly equipment is well-received, though more EU-level guidance on data protection and cyber security is sought. Awareness of other EU funding initiatives varies, with potential synergies and complementarities identified, particularly with the Customs Programme and European Ports Alliance. Early feedback suggests the equipment improves customs performance, though sharing with other border authorities is limited due to legal and operational constraints. External factors like economic uncertainty and security concerns impact the programme's utility in some regions. The CCEI's value lies in enabling equipment upgrades that surpass national funding capabilities, though reliance on CCEI funding sometimes limits broader procurement due to reduced national budget allocations. Collaborative opportunities within the CCEI are positively noted by countries such as Germany and Estonia.

Management of the CCEI

The management of the CCEI requires varying amounts of staff resources across Member States (MS), with managing active grants and preparing grant applications being the most time-consuming tasks, requiring on average 60 and 40 staff days annually, respectively. While most MS find the resource demands manageable, the preparation of grant applications is noted as particularly resource-intensive by 19% of respondents, primarily due to the burdensome data collection and reporting processes. Opinions on the management of the CCEI are generally positive, with the guidance from DG TAXUD and the effectiveness of the CCEI Coordination Group being well-received. However, there are calls for improvements in the clarity and usefulness of Annual Progress Reports and the appropriateness of monitoring indicators. To enhance the management and implementation of the CCEI, MS suggest simplifying processes and reducing administrative burdens, such as minimising the need for extensive statistical data in applications. There is also interest in centralising equipment procurement to improve coordination and efficiency, as well as providing unified instructions and sharing technical specifications to streamline actions on the EU Tender Portal.

Interviews

While the most important findings from the interview programme have fed into the evidence base for the evaluation questions, the thematic headline findings from the interviews for each of the different main types of stakeholders are broken down below.

National customs administrations

Impact and Benefits of CCEI

- Equipment procurement and funding. CCEI has been pivotal in providing necessary funding for customs equipment, enabling Member States to undertake procurement that would have been challenging solely through national budgets. This has been particularly crucial for countries facing budget cuts due to geopolitical factors.
- Enhancement of customs control: The programme has significantly enhanced the accuracy and efficiency of customs controls. For instance, one Member State's acquisition of fixed scanners allowed for better resource allocation and improved detection accuracy, while another's use of substance detectors expedited control procedures by reducing reliance on laboratory analyses.

Challenges and Areas for Improvement

- Data collection and reporting. Member States reported that the data collection and reporting requirements under CCEI were often cumbersome and time-consuming. These processes involved duplicating existing information and required significant manual effort, diverting resources from core operational tasks. Simplifying these requirements could enhance efficiency and allow customs authorities to focus on their primary responsibilities.
- Procurement and implementation delays. Many countries faced challenges due to complex procurement procedures, rising equipment costs, and lengthy tendering processes.
- Joint procurement challenges. Scepticism about the feasibility of joint procurement was expressed by several Member States due to differing national legislation, administrative procedures, and security requirements. These differences are seen as significant obstacles to successful collaboration.

Strategic and Operational Considerations

- National vs. EU needs. There is a recognised need to balance meeting specific national requirements with aligning broader EU goals. Member States emphasised the importance of flexibility in eligibility criteria to accommodate diverse national priorities and ensure that EU-wide objectives are met. Others pointed to the challenge of standardising equipment across countries with different needs and operational realities.
- Security and geopolitical concerns. Geopolitical tensions, particularly with China and the war in Ukraine, have significantly influenced procurement strategies and priorities. These factors have necessitated stricter security measures and a reassessment of equipment suppliers. Some Member States highlighted the impact of these tensions on their procurement decisions, necessitating enhanced security protocols.

Recommendations and future outlook

- Simplification and streamlining: Streamlining data collection and reporting processes is a key recommendation, with proposals for automated systems to alleviate administrative burdens and improve efficiency. Denmark and Germany suggested that reducing redundancy in data requirements could free up resources for more strategic activities within customs administration.

- Enhancing knowledge sharing: There is a call for more informal knowledge-sharing platforms, such as workshops and peer-to-peer sessions, to facilitate best practice exchanges and enhance collaboration among Member States. Sweden and Ireland emphasised the value of these exchanges in improving customs practices and fostering innovation
- Expanding eligibility criteria: Suggestions include expanding CCEI's scope to include emerging technologies like AI-powered systems and drones, as well as infrastructure and maintenance costs. This would allow Member States to better meet evolving customs control needs and enhance operational capabilities.
- Fostering standardisation and harmonisation: The importance of standardising equipment across the EU to enhance interoperability and ensure cohesive customs operations is emphasized. Some Member States suggested that the Commission play a more active role in assessing and coordinating equipment needs to achieve greater standardisation across Member States.

Equipment manufacturers

More Transparency on Procurement Plans:

Manufacturers consistently highlighted the need for clearer information regarding upcoming CCEI funding rounds and procurement plans. There is a strong desire for better visibility into which countries are planning to procure equipment and the specific timelines for these procurements. Additionally, manufacturers are requesting more detailed breakdowns of funding allocations, not merely by unit numbers but also by equipment type and monetary value. This enhanced transparency would enable suppliers to better prepare and align their production capabilities with the anticipated demand.

Greater Standardisation of Requirements:

Several manufacturers noted the inefficiencies and increased costs resulting from varying specifications for similar equipment across different countries. To address this, there is a suggestion for the Commission to provide more standardised guidelines or a comprehensive "catalogue" of approved equipment configurations, which would streamline the procurement process. Furthermore, some manufacturers propose the development of common EU-wide standards for equipment performance and cybersecurity, facilitating a more cohesive and efficient procurement environment.

Increased Engagement Between Commission and Industry:

Manufacturers are advocating for more direct communication channels with the Commission and customs authorities. Suggestions for achieving this include the organisation of regular industry briefings and brokerage events to showcase new technologies. Additionally, there is a call for a dedicated point of contact for equipment suppliers, which would facilitate more opportunities for manufacturers to provide input on technical specifications and future needs. Such engagement would foster a collaborative environment and ensure that industry perspectives are considered in decision-making processes.

Mechanisms to Support Innovative Technologies:

Many companies, particularly those with newer or more innovative products, face challenges in getting their equipment recognised and eligible for procurement by customs authorities. To support innovation, proposals include creating an "other" category for emerging technologies or utilising pre-procurement funds to help new technologies achieve licensing and approval. Some manufacturers suggest adopting a process similar to the US system, where funding is allocated to

develop solutions for specific challenges, thereby encouraging and supporting technological advancements.

Consideration of European Suppliers / Content:

Concerns have been raised by multiple manufacturers about competition from non-EU suppliers, particularly those from China, who often compete primarily on price. There is a desire for procurement criteria to place greater emphasis on factors such as security, quality, and European content, rather than focusing predominantly on price. To support EU strategic autonomy in this sector, some manufacturers suggest implementing incentives or preferences for European-based manufacturers.

Improved Clarity on Regulations and Processes:

Manufacturers have noted difficulties in navigating the different regulations across EU member states, especially concerning more sensitive technologies. There is a request for clearer guidance on topics such as licensing requirements, cybersecurity standards, and the process for getting new technologies approved for CCEI funding. Some suggest that the Commission could play a pivotal role in harmonising these requirements across the EU, reducing complexity and ensuring consistency.

Feedback and Continuous Improvement Mechanisms:

Several manufacturers have recommended the implementation of systems that allow customs authorities to provide feedback on equipment performance. Such feedback could inform future procurement decisions and assist manufacturers in improving their products. Additionally, there is interest in understanding how the CCEI programme itself might evolve in future phases, particularly in terms of software and integration capabilities. This reflects a broader industry desire for a more coordinated, transparent, and innovation-friendly approach to the CCEI programme, while also balancing the needs and autonomy of individual member states.

Other stakeholders

CELBET

CELBET is a specialised EU initiative dedicated to enhancing customs operations and border management across the EU's external land borders. As it transitions into the EU Customs Alliance for Borders, its scope will broaden to encompass additional areas of focus. CELBET plays a pivotal role in its interaction with the Customs Control Equipment Initiative (CCEI) by maintaining regular discussions and fostering a network among Member State experts. This ensures seamless communication and support throughout the procurement process. Among the challenges faced are the differentiation between infrastructure and equipment, particularly concerning high-energy scanners, and cybersecurity concerns related to procurement laws. Suggestions for improvement include moving from a Border Crossing Point (BCP)-focused approach to an equipment-based approach for proposal submissions and potentially establishing an EU-level institute for joint procurement to standardise equipment across Member States.

JRC

The JRC has acknowledged that while the programme effectively supplies detection equipment, it has not fully realised its innovation goals. The framework does support innovation, yet proposals often lack emphasis on this criterion. The JRC advocates for stricter adherence to evaluation criteria to encourage innovation. Challenges in the evaluation process include a mix of political considerations, which can undermine technical evaluations, and a recommendation for improving the integrity of this process by relying exclusively on external evaluators. Although they noted some complementarity with national initiatives, there was no significant

overlap with other EU initiatives. They also suggested that the programme could improve by enforcing its focus on innovation more rigorously.

OLAF

OLAF's involvement with the CCEI includes ensuring alignment with other programmes and preventing financial overlaps. The CCEI complements OLAF's focus on law enforcement agencies by addressing border-related needs. The programme's design is robust, with specific delegated acts providing clarity on indicators and monitoring systems. The budget of EUR 1 billion is deemed appropriate, given the high costs associated with equipment. Suggestions for improvement include enhancing the evaluation of laboratory-related proposals and introducing security notices to prevent procurement from sensitive third countries.

WCO

While the WCO's work is not directly tied to the CCEI, the interviewee indicated that the standards developed by the WCO are expected to apply to equipment purchased by all countries, including EU MS. They also stated EU experts and MS collaborate to ensure alignment with these standards. Furthermore, while the WCO is not actively monitoring the implementation of the CCEI, discussions within the organisation suggest that the Instrument is proceeding well and in line with the objectives of the WCO.

Workshop

The feedback obtained during the workshop was used to validate and, where appropriate, revise and refine the draft conclusions and recommendations. The discussion with stakeholders was structured around four main themes and corresponding questions (see below). The main findings from the workshop (and specifically the breakout groups) are summarised below:

Delays in implementation: *Why are so many projects progressing so slowly?*

The discussion of the first group focused on how smaller grants, which can be awarded more frequently and adapted more easily than larger ones, could help reduce the complexity of amendments (and subsequently) delays. Others from the group highlighted the fact that different administrations often share jurisdiction over the land itself on which BCPs sit which can complicate processes such as permitting of equipment. Others indicated that they have to comply with mandatory national procurement legislation that slow down the process. Meanwhile, the second group discussed the impact of (cyber)security concerns in procurement with regards to uncertainty around certain suppliers in an already concentrated supplier market. Interrelatedly, the group also noted the delivery delays which were mostly attributed to stock issues and increased demand which were, at times, exacerbated by national procedural issues (like those discussed in Group 1). Finally, the third group shared the view that the CCEI may have increased demand for some equipment, leading to delays in delivery of CCE.

Data model: *How could the data (available CCE per BCP, traffic, risks, performance indicators) be collected and used more effectively and efficiently?*

The first group argued that while providing inventory data was not challenging, defining traffic statistics and performance indicators was problematic with concerns raised about the workload involved in compiling statistics. There was a lack of clarity on setting seizure targets due to unpredictable traffic flows at BCPs. Furthermore, price variations for some equipment were significant from the signing of the grant agreements, leading to mismatches in the required equipment and the level of funding. Furthermore, the second group agreed that the data model was seen as cumbersome and repetitive with participants questioning the necessity of some elements and highlighting the need for simplification. While participants acknowledged the

importance of data collection at the EU level, they suggested national data collection systems could also be effective without the model.

Added value: How could the impact and added value of the CCEI be further enhanced?

The first workshop group remarked on how broadening the eligibility criteria to include related-infrastructure and software would add more value for Member States, with the latter also emerging from the second group's discussion. However, group two also highlighted that, if the CCEI were to open the list of eligible equipment to pieces such as drones, this would likely require adapted legal bases and expertise in many Member States.

Alternatives to the CCEI: Post-2027, could the (very relevant) CCEI objectives be better achieved by other means?

Rather than alternatives to CCEI, both Groups two and three highlighted their desire for increased joint procurement in the future, although doubts remained on how to approach the immediate next steps on how achieve this. Price advantages through bulk purchases and standardisation were particularly underlined.