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#### COVER NOTE

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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND  
THE COUNCIL**

**on the evaluation of the European Union Agency for the Operational Management of  
Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA) in  
accordance with Article 39 of Regulation (EU) 2018/1726**

{SWD(2026) 980 final}

## 1. Introduction

The growing complexity of migration, border management, and internal security across the European Union has long required robust, scalable, and reliable information systems. As the Schengen area expanded and the need for shared databases to support visa management, asylum processing, and police cooperation increased, it became clear by the late 2000s that a dedicated authority was needed to manage the EU's large-scale IT systems securely and efficiently. Therefore, the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA) was established in 2011 through Regulation (EU) No 1077/2011<sup>1</sup>.

Initially, eu-LISA oversaw the operational management of existing large-scale IT systems in the area of freedom, security and justice, namely the second generation Schengen Information System (SIS II), the Visa Information System (VIS), and the European Asylum Dactyloscopy Database (Eurodac). It was also entrusted with potentially supporting the development and operation of additional IT systems.

Since becoming operational in 2012, the Agency has gradually expanded its capabilities to meet the growing demand for secure, reliable, and scalable IT solutions in migration, border management, and internal security. A key milestone in this expansion was the amendment of the eu-LISA Regulation in 2015, which updated the Agency's responsibilities related to Eurodac. This change was made through the adoption of Regulation (EU) No 603/2013 (Eurodac recast Regulation), which introduced new requirements for the Agency's work in this area<sup>2</sup>.

By the mid-2010s, a series of pressing challenges emerged that tested the EU's migration, border management and internal security frameworks. The 2015–2016 migration crisis significantly strained asylum and border management infrastructures, while a heightened threat of terrorism underscored the need for an enhanced control of the external borders and real-time information sharing between national authorities. In addition, the risks of identity fraud and data fragmentation across different EU-level systems became a growing concern. These challenges revealed the limitations of existing systems and coordination models, underscoring the need for a more effective and adaptable approach.

In response, the eu-LISA's mandate was revised through Regulation (EU) 2018/1726<sup>3</sup> (hereinafter referred to as 'the eu-LISA Regulation' or "current Regulation"). The revision,

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<sup>1</sup> Regulation (EU) No 1077/2011 of the European Parliament and the Council of 25 October 2011 establishing a European Union Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (OJ L 286, 01.11.2011, p. 1-17).

<sup>2</sup> Regulation (EU) No 603/2013 of the European Parliament and of the Council of 26 June 2013 on the establishment of 'Eurodac' for the comparison of fingerprints for the effective application of Regulation (EU) No 604/2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, and amending Regulation (EU) No 1077/2011 establishing a European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (recast) (OJ L 180, 29.6.2013, p. 1–30)

<sup>3</sup> Regulation (EU) 2018/1726 of the European Parliament and of the Council of 14 November 2018 on the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA), and amending Regulation (EC) No 1987/2006 and Council Decision 2007/533/JHA and repealing Regulation (EU) No 1077/2011, (OJ L 295, 21.11.2018, p. 99–137).

which was based on the first evaluation of the Agency's mandate<sup>4</sup>, was not simply an upgrade, but a necessary strategic adjustment to equip the Agency to address the evolving migration and security landscape.

The current eu-LISA Regulation maintains the Agency's core objective of contributing to a high-level security within the area of freedom, security and justice, including by facilitating border management and law enforcement. Furthermore, the current Regulation expanded the Agency's mandate, notably to include the development and management of new large-scale systems, such as the Entry/Exit System (EES) and the European Travel Information and Authorisation System (ETIAS). It also tasked the Agency with the implementation of the interoperability framework between the justice and home affairs IT systems, i.e. a landmark initiative to eliminate the data silos that have hampered effective policy implementation.

Article 39 of the eu-LISA Regulation calls for an evaluation of the performance of the Agency in relation to its objectives, mandate, locations and tasks with a view to identifying potential areas for improvement.

The Commission carried out the supporting study between October 2023 and November 2024<sup>5</sup>, covering the period from the entry into force of the current eu-LISA Regulation in 2018 until March 2024. The evaluation also compared the situation with the period between 2012 and 2018 before the current regulation entered into force. While the study formally concluded in 2024, the evaluation integrates developments up to June 2025. Extending the evaluation period allowed the Commission to reflect the significant organisational and management changes that the Agency underwent in parallel to the study, thereby ensuring that the assessment captures the most recent progress and provides a more comprehensive and accurate picture of the Agency's performance. The current evaluation is based on a broad consultation involving the European Commission, staff and contractors of eu-LISA, Member States authorities participating in the governance bodies of eu-LISA (including Advisory Groups, Project Management Boards and Management Board members) from both the home affairs and justice domains, EU Agencies (including the European Border and Coast Guard Agency and Eurojust), the European Public Prosecutor's Office (EPPO), the European Data Protection Supervisor (EDPS), and national data protection authorities.

This evaluation assessed the performance of the Agency in relation to its objectives, mandate, location and tasks. It also included an analysis of the legal and policy frameworks governing eu-LISA and focussed on the performance of the tasks, the organisation set-up, including the governance and locations of the Agency, and the management of economic, human and technical resources. Furthermore, the evaluation analysed the relevance and the added value of the Agency for the EU, by assessing to what extent the new mandate of the Agency, introduced in 2018, has contributed to achieving the objectives of the Agency, and to which extent it has supported Member States in the development and implementation of the large-scale IT systems in the area of freedom, security and justice.

This report summarises the conclusions that the Commission has drawn from the evaluation of the implementation of the current eu-LISA Regulation, detailed in the Commission staff working document that accompanies the report<sup>6</sup>. The evaluation takes stock of the state of play in the implementation of the current eu-LISA Regulation and identifies a series of areas of

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<sup>4</sup> European Commission 2017, *Report from the Commission to the European Parliament and the Council on the functioning of the European Agency for the operational management of largescale IT systems in the area of freedom, security and justice (eu-LISA)*, COM(2017) 346 final, Brussels.

<sup>5</sup> Study to support the evaluation of Regulation (EU) 2018/1726 of the European Parliament and of the Council of 14 November 2018 on eu-LISA. ISBN: 978-92-68-34401-9

<sup>6</sup> SWD(2026) 980

attention for improvement that will feed into the future work of the Commission, eu-LISA and the Member States.

## **2. Abstract of the evaluation and key findings-**

Despite a complex operational and policy environment—marked by accelerating digitalisation, rising security threats, and geopolitical instability—this evaluation concludes with a broadly positive assessment of the performance, relevance, coherence, efficiency, and EU added value of eu-LISA. The Agency has proven indispensable for the implementation and operational management of large-scale IT systems in the area of freedom, security and justice, supporting Member States and EU institutions in delivering coordinated, secure, and effective digital infrastructure.

**The eu-LISA Regulation remains highly relevant.** The Agency's importance has increased in light of developments, such as increased mobility of EU citizens and third-country nationals, rapid technological advancements, heightened cyber-attack risks, and ongoing geopolitical tensions, particularly those linked to the Russian war of aggression against Ukraine and the conflicts in the Middle East.

Since the adoption of the current eu-LISA Regulation, the Agency's mandate remained relevant and has been further strengthened in response to emerging security and migration challenges. By way of amendments to the eu-LISA Regulation, the Agency was entrusted with additional responsibilities relating to new IT systems, including EES, ETIAS, the e-CODEX system<sup>7</sup>, ECRIS-TCN<sup>8</sup>, revised VIS<sup>9</sup>, the Joint Investigation Teams Collaboration Platform (JITs CP)<sup>10</sup>, and the new Eurodac<sup>11</sup>. These systems were designed to facilitate information exchange and enhance cross-border cooperation among relevant authorities across the EU. Additionally, the Agency's responsibilities have been expanded to include the development and management of the interoperability of the large-scale IT systems<sup>12</sup>. Furthermore, the Agency has started to carry

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<sup>7</sup> Regulation (EU) 2022/850 of the European Parliament and of the Council of 30 May 2022 on a computerised system for the cross-border electronic exchange of data in the area of judicial cooperation in civil and criminal matters (e-CODEX system) and amending Regulation (EU) 2018/1726 (OJ L 150, 01.06.2022, p. 1-19)

<sup>8</sup> Regulation (EU) 2019/816 of the European Parliament and of the Council of 17 April 2019 establishing a centralised system for the identification of Member States holding conviction information on third-country nationals and stateless persons (ECRIS-TCN) to supplement the European Criminal Records Information System and amending Regulation (EU) 2018/1726 (OJ L 135, 22.5.2019, p. 1-26)

<sup>9</sup> Regulation (EC) No 767/2008 as last amended by Regulation (EU) 2021/1134 of the European Parliament and of the Council of 7 July 2021 amending Regulations (EC) No 767/2008, (EC) No 810/2009, (EU) 2016/399, (EU) 2017/2226, (EU) 2018/1240, (EU) 2018/1860, (EU) 2018/1861, (EU) 2019/817 and (EU) 2019/1896 of the European Parliament and of the Council and repealing Council Decisions 2004/512/EC and 2008/633/JHA, for the purpose of reforming the Visa Information System (OJ L 248, 13.7.2021, p. 11-87)

<sup>10</sup> Regulation (EU) 2023/969 of the European Parliament and of the Council of 10 May 2023 establishing a collaboration platform to support the functioning of joint investigation teams and amending Regulation (EU) 2018/1726 (OJ L 132, 17.5.2023, p. 1-20)

<sup>11</sup> Regulation (EU) 2024/1358 of the European Parliament and of the Council of 14 May 2024 on the establishment of 'Eurodac' for the comparison of biometric data in order to effectively apply Regulations (EU) 2024/1351 and (EU) 2024/1350 of the European Parliament and of the Council and Council Directive 2001/55/EC and to identify illegally staying third-country nationals and stateless persons and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, amending Regulations (EU) 2018/1240 and (EU) 2019/818 of the European Parliament and of the Council and repealing Regulation (EU) No 603/2013 of the European Parliament and of the Council (OJ L, 2024/1358, 22.5.2024)

<sup>12</sup> Regulation (EU) 2019/817 of the European Parliament and of the Council of 20 May 2019 on establishing a framework for interoperability between EU information systems in the field of borders and visa and amending Regulations (EC) No 767/2008, (EU) 2016/399, (EU) 2017/2226, (EU) 2018/1240, (EU) 2018/1726 and (EU) 2018/1861 of the European Parliament and of the Council and Council Decisions 2004/512/EC and 2008/633/JHA (OJ, L 135, 22.5.2019, p. 27-84) Regulation (EU) 2019/818 of the European Parliament and of the Council of 20

out operational tasks for the existing systems, including 24/7 duty system, to ensure their efficient and resilient functioning. Significantly, the updated mandate also empowered eu-LISA to support Member States and the European Commission upon request and to bolster its role through research monitoring activities and pilot testing.

The current evaluation confirms that eu-LISA's mandate remains relevant and aligned with operational needs, including as regard the development of new IT systems. The evaluation concludes that eu-LISA's activities in relation to research remain relevant, however, the Agency should prioritise those that have a direct impact on the operation or development of large-scale IT systems it manages. The Agency's should nevertheless maintain strong operational performance as a key factor determining its ongoing relevance in the future.

**The assessment of eu-LISA's effectiveness is mixed.** While eu-LISA performs well in the management of existing large-scale IT systems, with positive stakeholder feedback on service continuity and incident response, there is an important scope for improvement concerning the development of new systems.

The effectiveness of the current eu-LISA Regulation in achieving its objectives varies across different tasks:

- The operational management of existing systems is generally very effective, and it has been identified as a strength.
- The development of new systems is less effective, with the Agency encountering challenges related to, for example, contractor management, internal coordination, and resource allocation. These challenges have resulted in significant delays, notably in relation to the EES, ETIAS, ECRIS-TCN and revised VIS.
- The effectiveness of the Agency in conducting tasks that are not related to the systems is mixed, with positive outputs in research monitoring, but the limited use of pilot testing and ad hoc support to the European Commission and Member States, as provided in Articles 15 and 16 of the current eu-LISA Regulation.

**The assessment of eu-LISA's efficiency presents a nuanced picture.** While the Agency has demonstrated strong efficiency in the operational management of existing large-scale IT systems, there remains considerable scope for improvement in the development and delivery of new systems. Challenges in this area largely stem from complexities in contractor management and difficulties with adhering to timelines for major projects, such as the EES and the ETIAS.

From an organisational and governance perspective, eu-LISA overall operates efficiently and continuously strives to optimise its internal processes. Nonetheless, certain structural issues have been identified that hinder the Agency's optimal performance. These include a rigid unit-based organisational model, oversized teams, and overlapping responsibilities, particularly in stakeholder engagement. Additionally, eu-LISA's operations are fragmented across different locations in Tallinn, Strasbourg and Sankt Johann im Pongau. These factors have, at times, contributed to inefficiencies, notably in contract management and oversight, as well as recruitment of the Agency's staff. The Agency's governance framework is inherently complex and can generate substantial administrative overhead. While this complexity is to some extent justified by the need to ensure robust coordination across Member States and EU institutions concerns have been raised about the administrative burden resulting from meeting-heavy schedules. The evaluation concludes that streamlining governance mechanisms and enhancing

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May 2019 on establishing a framework for interoperability between EU information systems in the field of police and judicial cooperation, asylum and migration and amending Regulations (EU) 2018/1726, (EU) 2018/1862 and (EU) 2019/816 (OJ L, 135, 22.5.2019, p. 85-135)

coordination among governance bodies could generate valuable synergies, reducing organisational overhead. At the same time, eu-LISA's excessive reliance on external contractors for technical delivery poses persistent challenges, limiting its ability to effectively oversee complex IT projects. Addressing this dependency by boosting internal knowledge, improving talent retention, and strengthening project ownership is essential for ensuring long-term organisational resilience.

eu-LISA is recognised for its competent management of operational IT systems. Stakeholders consistently confirm the Agency's capacity to swiftly address and mitigate incidents, ensuring service continuity. However, there is scope for improvement to enhance efficiency through finding a strategic balance between handling support functions in-house and outsourcing them to external providers. In contrast, the efficiency of new IT systems development has been more challenging. For instance, the EES project experienced multiple delays and quality challenges, which hindered timely delivery and early handover. Although stakeholder feedback is not overtly critical, satisfaction levels of the Agency's efficiency in terms of system development lag behind those for operational management.

**The current eu-LISA Regulation is to a large extent legally coherent both internally and externally.** Only a limited number of challenges have been identified in relation to its coherence with other legal acts, most notably concerning its interaction with the e-CODEX Regulation. The e-CODEX Regulation imposes specific operational constraints. For example, it requires that e-CODEX management is exclusively conducted in Tallinn and that all resources allocated to the e-CODEX are committed in their entirety to that system, in order to provide for the respect of the principle of the independence of the judiciary<sup>13</sup>. These provisions hamper the efficient operational management of the system by eu-LISA, showing areas where regulatory adjustments could enhance administrative flexibility and operational synergies.

The broader legal environment in which eu-LISA operates is inherently complex, with the multitude of overlapping legal instruments that the Agency must navigate. These include the current eu-LISA Regulation itself, each system's establishing Regulations, as well as overarching frameworks on data protection, financial management, human resources, and Artificial Intelligence. To ensure seamless governance and operational integrity, it is crucial that the eu-LISA Regulation is aligned and coherent with the respective legal bases governing each system. Internally, the evaluation found no significant challenges regarding coherence.

Finally, the evaluation concludes that **the objectives of the current eu-LISA Regulation could have not been achieved sufficiently by Member States acting alone.** The current mandate of eu-LISA plays a pivotal role in advancing the Agency's core mission: to contribute to a high level of security within the area of freedom, security, and justice, notably by facilitating border management and law enforcement cooperation. By centralising the operational management of multiple large-scale IT systems, eu-LISA not only supports Member States in their implementation efforts but also leverages significant economies of scale, fostering greater efficiency and consistency across the Union. The evaluation finds that, despite opportunities for improvement in the development of new systems, the absence of an EU level agency like eu-LISA would lead to a drastically more fragmented IT landscape, compromising the security and interoperability essential to the justice and home affairs domains. Accordingly, the evaluation confirms the EU added value of the current Regulation.

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<sup>13</sup> Article 14(2) of Regulation (EU) 2022/850 of the European Parliament and of the Council of 30 May 2022 on a computerised system for the cross-border electronic exchange of data in the area of judicial cooperation in civil and criminal matters (e-CODEX system) and amending Regulation (EU) 2018/1726 (OJ L 150/1, 01.06.2022).

The evaluation, however, underlined the need for the Agency to remain flexible and adaptive through stronger performance in research monitoring and development that would contribute to new IT-based solutions. In this respect, eu-LISA – instead of carrying out only pure research activities – should strengthen its capacity to monitor technological and research developments as well as to establish a robust technological watch function, which will allow the Agency to identify emerging solution that may be relevant for the systems it manages, such as AI or cloud technology. By doing so, eu-LISA would be able to ensure that innovative technologies are identified early, evaluated for their potential, and integrated efficiently into its systems where relevant. Additionally, the Agency should enhance its cooperation with third-country actors and international organizations, and refine its internal organisation, to maintain its efficiency and effectiveness in a rapidly evolving environment.

### 3. Conclusions and recommendations

The evaluation concluded that the current mandate and objectives of eu-LISA remain largely adequate. While the Agency has demonstrated effective performance in fulfilling several aspects of its mandate, opportunities for improvement remain in the areas of effectiveness, efficiency, and coherence.

Challenges persist particularly in the development of IT systems. There is also scope for improvement as regard the alignment of the current eu-LISA Regulation with other relevant legal instruments, notably the e-CODEX Regulation, cooperation with international organisations, as well as piloting, testing, and ad hoc support to Member States. These challenges are linked to a range of internal factors, including strategic planning, budget and human resources management, technology infrastructure, contractor oversight, and aspects of the Agency's organisational and governance structure.

Taking these findings and the complex operating environment into account, the evaluation confirms that, at this stage, eu-LISA's mandate remains appropriate. Since the adoption of the current eu-LISA Regulation, the Agency has successfully delivered two of the critical systems, the renewed Schengen Information System and the Entry/Exit System, as well as the first component of the Interoperability framework (the shared Biometric Matching Service), while four others (ECRIS-TCN, Eurodac, ETIAS and the Common Identity Repository) are scheduled for operational launch in 2026. Although modifications to eu-LISA's current mandate could be beneficial in some areas, any significant alterations to the mandate at this stage could divert the Agency from its core objectives and jeopardise its capacity to deliver the planned priority IT systems on time, resulting in a further delay in the rollout of the Interoperability Framework.

In particular, modifying eu-LISA's mandate by amending the current eu-LISA Regulation in the near future would pose significant challenges at both strategic and operational levels:

- **Increased risk exposure:** Modifying the mandate, particularly Article 16(4) of the current eu-LISA Regulation<sup>14</sup>, regarding ad hoc support to Member States, could heighten the Agency's risk exposure. While greater flexibility in this area may be desirable, the evaluation suggests that eu-LISA should prioritise completing its ongoing projects before taking on additional tasks. Any new tasks assigned to eu-LISA through

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<sup>14</sup> Article 16(4) of the current eu-LISA Regulation provides that ‘a group of at least five Member States may entrust the Agency with the task of developing, managing or hosting a common IT component to assist them in implementing technical aspects of obligations deriving from Union law on decentralised systems in the area of freedom, security and justice. Those common IT solutions shall be without prejudice to the obligations of the requesting Member States under the applicable Union law, in particular with regard to the architecture of those systems’.

a modification of Article 16(4) would increase the likelihood of further delays in the Interoperability Project.

- **Instability and delays:** Introducing a revised mandate at this time could create instability given the Agency's commitment and task to deliver four large-scale IT systems and one interoperability component within the next two years. A change in the mandate at this moment would likely increase the risks of delays.
- **Budgetary constraints:** An amendment to the mandate does not automatically mean additional resources. Therefore, any increase in tasks would necessitate commensurate financial support, including a new Legislative and Financial Statement, which would also increase financial instability.

Certain weaknesses identified in the evaluation, such as the cooperation with third-countries or the use of innovative technological solutions for the operation and management of the systems, including the use of cloud technology, would require a change of eu-LISA's mandate. In contrast, a large number of other issues identified can be addressed operationally without an immediate mandate change. Therefore, while the Agency would benefit from a targeted revision of its mandate, most of the immediate shortcomings identified can be addressed through operational changes, providing the Agency with the necessary stability to deliver on the more time pressing projects.

**The evaluation finds that not amending the mandate at this stage could, for now, better serve eu-LISA to deliver effectively and efficiently on its ongoing tasks.** Therefore, eu-LISA should prioritise organisational stability and strategic operational improvement. The challenges identified in the evaluation that may require a mandate revision can be addressed once eu-LISA has completed its most pressing tasks, such as delivering the planned IT systems and implementing the interoperability architecture.

Based on this conclusion, the evaluation put forward a list of 54 recommendations (under the heading 'global assessment of the areas of attention')<sup>15</sup>. The priority order of the recommendations in the list is based on (1) their urgency; (2) their feasibility; and (3) the evaluation criteria. Considering the evaluation's finding that the mandate changes could create further risks and impediments for eu-LISA in the current context, mandate-related recommendations have been de-prioritised in the short term.

On this basis, the evaluation has identified the following 11 recommendations, to be implemented by eu-LISA, as the most important. They can be implemented without changes to the current eu-LISA mandate and will contribute directly to organisational stability and the timely delivery of the Agency's tasks. These are:

- develop a target operating model (TOM) to help eu-LISA operate effectively while managing risks, making decisions quickly, and ensuring clarity in responsibilities, in particular, in the event of incidents and emergencies.
- develop and implement a comprehensive medium-term human resources strategy.
- establish and implement a medium to long-term technology strategy.
- implement a multiannual portfolio management approach.
- improve resource planning functionalities, e.g. through establishing processes and using appropriate tools to address incomplete view of staff allocation and steering.

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<sup>15</sup> Study to support the evaluation of Regulation (EU) 2018/1726 of the European Parliament and of the Council of 14 November 2018 on eu-LISA. ISBN: 978-92-68-34401-9

- deploy an integrated tool for the development cycle (such as Jira™) across eu-LISA and contractors to streamline project management and collaboration, minimising disruptions, optimising workflows, and ensuring relevance.
- establish and implement a medium-term sourcing and outsourcing strategy.
- Strengthen existing capacities concerning in-house legal services.
- update the service catalogue with full descriptions of services and define clear roles and responsibilities for service owners and managers.
- improve visibility about current resource allocation, project status, processes, bottlenecks, shortages, to enable more informed discussion about the prioritisation of projects, also at political level.
- decrease dependency from external contractors, while increasing project ownership and knowledge retention.

The Commission invites eu-LISA to develop an action plan to implement all recommendations identified.