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**IMPACT ASSESSMENT REPORT**

***Accompanying the document***

**Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

**amending Regulation (EU) 2019/1896 of the European Parliament and of the Council of 13 November 2019 on the European Border and Coast Guard**

{COM(2026) 1030 final} - {SEC(2026) 1030 final} - {SWD(2026) 1031 final}

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**Glossary**

| Term or acronym | Meaning or definition |
|---|---|
| ALDO | Advanced-Level Document Officer |
| AMIF | Asylum, Migration and Integration Fund |
| BCP | Border Crossing Point |
| BMVI | Border Management and Visa Instrument |
| CCC | Common Core Curriculum |
| CISE | Common Information Sharing Environment |
| CEOS | Conditions of Employment of Other Servants of the European Union |
| CF | Consultative Forum |
| CSDP | Common Security and Defence Policy |
| DPO | Data Protection Officer |
| EASA | European Union Aviation Safety Agency |
| EBCG | European Border and Coast Guard |
| EEAS | European External Action Service |
| EES | Entry-Exit System |
| EDPS | European Data Protection Supervisor |
| EIBM | European integrated border management |
| EFCA | European Fisheries Control Agency |
| EMPACT | European Multidisciplinary Platform Against Criminal Threats. |
| EMSA | European Maritime Safety Agency |
| ERCC | Emergency Response Coordination Centre |
| ETIAS | European Travel Information and Authorisation System |
| EUAA | European Union Agency for Asylum |
| EUDPR | Regulation (EU) 2018/1725 European Data Protection Regulation |
| EURLOs | European Return Liaison Officer |
| EUROSUR | European Border Surveillance System (an integrated framework for the exchange of information and for operational cooperation within the EBCG to improve situational awareness and to increase reaction capability for the purposes of border management, including the detection, prevention and combating of illegal immigration and cross-border crime) |
| EURP | EU Reintegration Programme |
| FADO | False and Authentic Documents Online |
| FAR | Frontex Application for Returns |
| FLOs | Frontex Liaison Officers |
| FRESO | Frontex Return Escort and Support Officer |
| FRM | Fundamental Rights Monitor |
| FRO | Fundamental Rights Officer |
| FWA | Fixed-wing aircraft |
| GDPR | General Data Protection Regulation |

| | |
|---|---|
| HLRTR | High-Level Round Table on Returns |
| IAC | Internal Audit Control |
| HRS | Human Resources and Corporate Services Division |
| ICMPD | International Centre for Migration Policy Development. |
| ICO | Internal Controls Office |
| IOM | International Organization for Migration |
| IRMA | Integrated Return Management Application |
| ISF | Internal Security Fund |
| JHA | Justice and Home Affairs |
| JO | Joint Operation |
| JORA | Joint Operations Reporting Application |
| KPI | Key performance indicator |
| MB | Management Board |
| MEF | Monitoring and Evaluation Framework |
| NCC | National coordination centre |
| NCDP | National capability development processes |
| NCDPs | National capability development plans |
| OPLAN | Operational plan |
| OPD | Operational Planning Division |
| OSCE | Organization for Security and Cooperation in Europe |
| OTP | Operational Training Programme |
| PD | Problem driver |
| PM | Policy measure |
| PO | Policy option |
| RECAMAS | RECAMAS reference model |
| RS | Return Specialist |
| RIAT | Reintegration Assistance Tool |
| RPAS | Remotely Piloted Aircraft Systems |
| SACs | Schengen Associated Countries, i.e. Iceland, Liechtenstein, Norway, and Switzerland |
| SAR | Search and rescue |
| SCH-EVAL | Schengen Evaluation and Monitoring Mechanism (SCH-EVAL), |
| SIM | Security and Information Management Division |
| SIRENE | Supplementary Information Request at the National Entries |
| SIS | Schengen Information System |
| SOP | Standard Operating Procedure |
| TA | Thematic area |
| TE | Technical equipment |
| TEP | Technical equipment pool |
| UCPM | Union Civil Protection Mechanism |
| UNHCR | Office of the United Nations High Commissioner for Refugees |
| VA | Vulnerability assessment |
| VIS | Visa Information System |

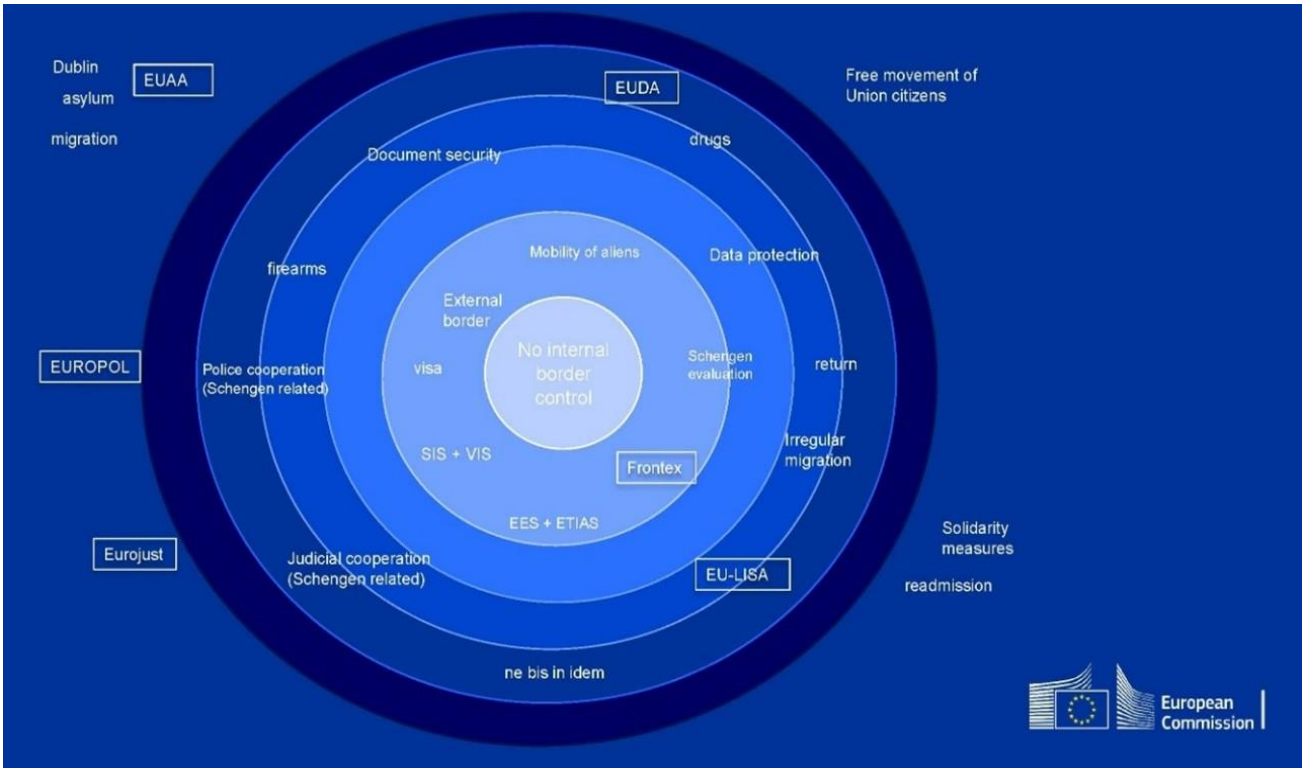
| | |
|---|---|
| C-UAS | Counter-Unmanned Aircraft systems |
| C-UxVs | Counter-Unmanned Vehicles and Vessels systems |

# 1. INTRODUCTION: LEGAL AND POLITICAL CONTEXT

## 1.1. Legal context

The objective of EU policy in the field of external border management is to develop and implement **European integrated border management** ('EIBM') at the national and EU level. The integrity of the Schengen area, one of the most tangible achievements of the EU, depends on robust border management. The EBCG Regulation tasks the European Border and Coast Guard ('**EBCG**')[1] and the national authorities responsible for border management with jointly implementing EIBM.

*Figure 1. The role of Frontex in European integrated border management and coordination with other EU Agencies*




The EBCG Regulation is the primary legislative instrument applicable to the European Border and Coast Guard Agency ('**Frontex**'). Since taking up its responsibilities on 1 May 2005, Frontex[2] has been successful in assisting Member States with implementing the operational aspects of external border management through joint operations and rapid border interventions, risk analysis, information exchange, cooperation with third countries and the return of persons with no right to stay in the EU.

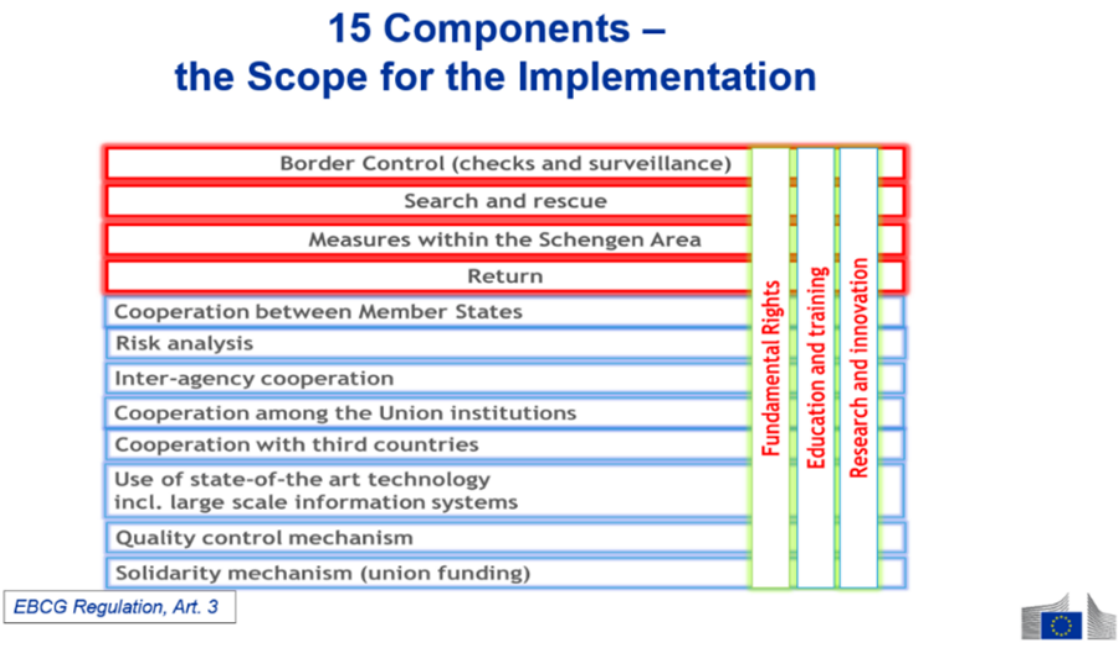
The EBCG Regulation provides for the **EBCG standing corps**, a dedicated uniformed force composed mostly of border and coast guard officers as well as return-related profiles deployed upon request of a Member State to support a wide range of activities with a focus on external border controls (i.e. checks at the border crossing points and border surveillance) and returns. They maintain a presence at

[1] The European Border and Coast Guard (EBCG) comprises the European Border and Coast Guard Agency ('Frontex'), the national authorities responsible for border management, including coast guards to the extent that they carry out border control tasks and the national authorities responsible for return.

[2] Frontex was originally established as the European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union, by Council Regulation (EC) No 2007/2004 of 26 October 2004 establishing a European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union (OJ L 349, 25.11.2004, p. 1).

Frontex's headquarters in Warsaw, and standing corps officers are also deployed in third countries. The EBCG Regulation also identifies components of **EIBM**[3] a policy tool to implement the gradual introduction of an integrated management system for external borders. The scope of EIBM is broad and includes border control, return, cooperation with third countries, inter-agency cooperation, the use of state-of-the-art technology, compliance with fundamental rights, training, quality control, and EU funding instrument. It sets out the rules applicable to establishing the policy cycles for EIBM. The EIBM strategy (2023-2027), provides a common, multiannual framework for EU's external borders management, and explicitly tasks the EBCG with ensuring consistently high-performing border management standards at every external border section, and in returns. The EBCG Regulation also incorporates the rules applicable to **EUROSUR**[4].

*Figure 2. Overview of the EIBM components*




On 2 February 2024, the Commission published a report on the evaluation of the EBCG Regulation including a review of the Standing Corps. The report was based on data available until the end of 2023[5]. The evaluation did not cover Frontex's *integrated capability planning* (relevant for EIBM under the EBCG Regulation) as this key element for delivering on objectives related to acquisition and deployment of technical equipment was only established once the evaluation was almost completed[6]. Overall, the evaluation found the EBCG Regulation to be adequate to the needs and challenges on the

[3] This includes 12 thematic components referred to in Article 8 of the EBCG Regulation and 3 overarching components (fundamental rights, research and innovation, as well as education and training).
[4] EUROSUR is an integrated framework for the exchange of information and for operational cooperation within the EBCG to improve situational awareness and to increase reaction capability for the purposes of border management, including the detection, prevention and combating of illegal immigration and cross-border crime.
[5] See COM(2024) 75 final. The Commission carried out the evaluation and review between May 2022 and October 2023, involving consultations with the Member States' authorities, the European Parliament, the Council, Frontex itself, and relevant EU agencies, including the Fundamental Rights Agency. This work has also been supported by an external study.
[6] Management Board Decision 23/2024 adopted on 25 September 2024 on the Capability Roadmap of the EBCG, the update of the Technical and Operational Strategy for EIBM (2023-2027) and the methodology and procedure for establishing the National Capability Development Plans.

external borders. It has also identified certain gaps and areas for improvement, which were set out in an action plan[7] and regularly updated in cooperation between the Commission and Frontex. In June 2024, the Justice and Home Affairs (JHA) Council identified several operational challenges affecting the effectiveness of EIBM, including organisational, technical, and governance shortcomings that require structural improvements within Frontex and its oversight mechanisms. It also emphasised the need for adaptable and well-equipped operational capacities, especially in adjusting the standing corps to evolving security threats, ensuring efficient recruitment, training, and deployment. In its conclusions of March 2025, the European Council, reiterated the EU's determination to strengthen security at its external borders and ensure their effective control, in line with EU and international law.

Moreover, Frontex itself identified a number of components of the current border management and return framework that need to be developed from a fragmented and reactive system into an integrated, forward looking and resilient system. This system should be based on improved strategic planning, further investments in human and technical resources, training, and technology, enhanced cooperation among Member States and with third countries, and a commitment to maintaining ethical standards and fundamental rights throughout operational activities. These elements are important prerequisites for Frontex's future contribution to border management and returns as well as the overall security of the Schengen area[8]. For details concerning the findings of the evaluation, their links with the current proposal, and the results of the ongoing monitoring of the implementation of the Regulation, see **Annex 7**.

### 1.2. Political context

Frontex has been explicitly mentioned in the **President's political guidelines** (2024-2029) as a key component of the EU's border management priorities, with comments stating the need to strengthen Frontex by equipping it with state-of-the-art surveillance and situational awareness technologies and increasing the EBCG standing corps to 30 000 officers. The political guidelines also refer to Frontex in the context of making internal security and law enforcement cooperation a clear priority. In order to tackle effectively migrant smuggling and cross-border threats, closer cooperation between Europol, Frontex and national law-enforcement authorities will need to cooperate closely and exchange information as part of a broader EU internal security strategy, in order to better address cross-border criminality.

The **Pact on Migration and Asylum**[9] which became fully applicable as of June 2026 aims to reinforce the EU's external borders through harmonised screening procedures, stringent border protocols, and improved data management systems. The new rules transform the EU's capacity to manage migration, asylum, and returns, and contribute to managing the EU's external borders, in a fair and firm manner. The new procedures and tools made available to Member States by the Pact – specifically the swift processing of third-country nationals arriving at external borders[10] and the return of those with no right to stay in the EU – may require increases in human resources dedicated in the border management and returns.

Preventing and combating illegal migration is one of the objectives of external border controls[11] and

[7] The action plan included measure to be taken by Frontex, the Management Board, Member States and the Commission.
[8] Frontex: White Paper on reinforcing Frontex to future-proof the European Integrated Border Management, Ares(2025) 4183014 (23/05/2025).
[9] Communication on a New Pact on Migration and Asylum COM(2020) 609 final (23 September 2020).
[10] Regulation (EU) 2024/1356 of the European Parliament and of the Council of 14 May 2024 introducing the screening of third-country nationals at the external borders [2024] OJ L 1356/1
[11] See Recital 6 of Regulation (EU) 2016/399 of the European Parliament and of the Council of 9 March 2016 on a Union Code on the rules governing the movement of persons across borders (Schengen Borders Code): *[…]. Border control*

as such a Frontex task. Illegal migration and internal security based on the protection of external borders continue to be a political priority of the EU, requiring a common and coordinated response by all Member States, as confirmed in the five-year **European asylum and migration management strategy**[12]**.** The Strategy prioritises maintaining external border integrity as key to internal security, including the development of a robust and effective EIBM and strengthening Frontex's operational support to Member States. Alongside this also effective return and readmission are one of the five objectives of the Strategy. Therefore, over the next five years, the EU must also be fully invested in building a comprehensive common European system for return. Furthermore, the protection of external borders is the first line of defence for internal security within the Schengen area. The new European internal security strategy **ProtectEU**[13] considers border security as one of the steps taken so far '*towards building a European security apparatus*'.

Recent geopolitical developments have greatly impacted the EU's external borders and will continue to do so, placing Frontex ever more at the forefront of the growing efforts to effectively protect Europe, its citizens and values. The Russian war of aggression against Ukraine has created a hostile geopolitical context on Europe's eastern borders. At the same time, the EU faces a spectrum of cross-border hybrid threats that are intensifying and adding further complexity to its border management and security environment, such as the instrumentalisation and weaponisation of migration, a trend that challenges traditional approaches to the management of external borders and continues to put strain on several land borders[14]. Cross-border crime remains a persistent threat to the EU's external borders. Over half of the most threatening criminal networks operating in the EU are involved in drug trafficking. Organised networks also engage in vehicle theft, firearms smuggling and document fraud. Moreover, migrant smuggling networks have become increasingly sophisticated. A consequence of continuous external border pressure is the increased reintroduction of internal border controls, which have been put in place repeatedly since the 2015 migration crisis[15]. Such measures, if continued or widened, undermine trust in Schengen and threaten the principle of free movement, one of the cornerstones of EU integration. Abuses of visa also affect the trust between Member States. The situation is aggravated by the intrinsic limitations of the current return system, where, despite the increase of the share of Frontex returns, the overall number of effective returns remains low. These trends call for reviewing and reinforcing the current capacities of the EBCG.

Under the EBCG Regulation, Frontex is tasked with assisting the Member States in returning third-country nationals, subject to EU return policy and in compliance with Directive 2008/115/EC. The role of Frontex in returns also requires a review, including in the context of the **Regulation establishing a common EU system for the return**[16] of third-country nationals staying illegally within the EU and the proposal for a Regulation on the digitalisation of case management in the area of return, readmission and reintegration.

Cooperation with third countries is an intrinsic component of the EU's management of the external

*should help to combat illegal immigration and trafficking in human beings and to prevent any threat to the Member States' internal security, public policy, public health and international relations.*

[12] COM(2026) 45 final, adopted on 29 January 2026 '[…] maintaining the integrity of the Union's external borders and of the Schengen area as an area without internal border controls is a key element of an integrated and comprehensive approach to migration management.'

[13] COM(2025) 148 final adopted on 1 April 2025

[14] European Commission (2023) Communication establishing the multiannual strategic policy for European integrated border management.

[15] State of Schengen report 2023.

[16] Proposal for a Regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC, COM/2025/101 final. Political agreement was achieved by the European Parliament and the Council on 1 June 2026.

borders. The importance of such cooperation and a **whole-of-route approach** to migration have been also highlighted in the European asylum and migration management strategy[17]. The Strategy recognised the need to maintain deep cooperation with the enlargement partners and to continuously support them, also by relevant EU agencies, with a focus, inter alia, on strengthening border management, supporting alignment with the EU *acquis* on migration, asylum and visa policies and enhancing readmission and return. The positive impact of cooperating with partner countries has already been demonstrated by the conclusion of status agreements with neighbouring countries in the Western Balkans and with Moldova. The deployment of the standing corps based on these agreements has had a tangible impact on the ability of these partner countries to manage their borders, particularly in curbing illegal crossings and managing migratory flows on the Western Balkan route[18]. The new generation of status agreements signed since 2022[19] with all Western Balkan partner countries builds on that success and shows that expanding Frontex's cooperation with neighbouring countries, EU accession candidates and potential candidates, other third countries relevant to managing migratory flows to the EU (e.g. in west and north Africa) supports the EU's efforts under the Pact on Migration and Asylum. Frontex's cooperation with partner third countries plays a role also in the Union's overall regional, route-based partnership approach.

The visa system is Europe's first line of security screening, helping to prevent illegal migration, organised crime, and terrorism. The first-ever **EU visa policy strategy**[20] reaffirms the dual nature of Europe's visa policy, namely, to protect the EU's security and integrity, and to enable legitimate bona fide travel that benefits the EU. It acknowledges Frontex's role in setting up a 24/7 ETIAS assistance centre to support both travellers and carriers. It also recognises a need for greater support from Frontex to Member States in visa policy, such as in detecting fraudulent documents or developing risk analysis product. Frontex, with its expertise on documents security and capacities in developing risk analysis product, can play an important role in delivering on the strategy objectives. It can also be instrumental in combating abuses of EU visa policy and residence permits.

While these legal and policy developments significantly expand expectations for Frontex's operational role, support functions and responsiveness, the legal framework governing Frontex has remained unchanged. In its current form, the EBCG Regulation does not allow these evolving expectations to be met through interpretation alone, without legal modifications. This growing mismatch between expectations and legal mandate directly affects Frontex's ability to deliver in an effective, efficient and predictable manner.

## 2. WHAT IS THE PROBLEM AND WHY IS IT A PROBLEM?

### 2.1. Problem overview

Europe is facing constantly changing and increasingly complex challenges at its external borders. While it is difficult to precisely predict how these challenges will unfold in the long term, the EBCG must be capable of responding effectively to unforeseen future risks. Frontex's mandate has been strengthened over the last decade to reinforce the EU framework on external border management, yet several interconnected legal, operational and structural issues still hinder Frontex's operations and involvement in achieving EIBM objectives.

[17] See p. 5, COM(2026) 45 final.
[18] Since 2019, the overall numbers of migratory flows on the Western Balkan route decreased (registrations on arrival in 2019 of 80 323 to 35 287 in 2025) [IOM Western Balkan – Mixed Migratory Flow Report (December 2025)].
[19] Status Agreement between the European Union and: Montenegro, OJ L 140, 30.5.2023, pp. 4; the Republic of North Macedonia, OJ L 61, 27.2.2023, pp. 3; the Republic of Serbia, OJ L, 2025/480, 13.3.2025; the Republic of Albania, OJ L, 2023/2107, 5.10.2023; and Bosnia and Herzegovina, OJ L, 2025/1346, 11.7.2025.
[20] COM(2026) 43 final.

The key deliverables set out by the EBCG Regulation, such as the ability to reach 10 000 standing corps officers, must be completed by the end of 2027. Developing a new medium to long-term strategic framework for EU external border protection is necessary, as Frontex forecasts persistent migratory and security pressures[21]: despite the current decline in numbers[22] of illegal border crossings into the EU[23], the outlook remains uncertain, particularly given that migrant smuggling continues to have a significant impact on both the EU's external borders and its internal security. As recalled in the European asylum and migration management strategy[24], over 90% of irregular migrants who reach the EU use services of smugglers for parts or entirety of their journey. While border control and management systems such as ETIAS, Entry/Exit System (EES) and the Visa Information System (VIS) will strengthen information exchange and security within the EIBM system, attempted illegal border-crossings will continue at the land and sea borders, as migrants might try to evade enhanced controls at border crossing points and divert to alternative routes. The cross-border threats, be it criminal, terrorist, hybrid or cyber, are expected to continue impacting the EU and its security.

The three identified problems reflect i) the findings of the 2024 evaluation of the EBCG Regulation[25], ii) lessons learnt from the application of the EBCG Regulation after the evaluation, and iii) the evidence collected as part of the study accompanying the Impact Assessment. Taken together, these problems and their underlying drivers reflect two overarching challenges identified in the evaluation and subsequent implementation experience: the rigidity and limited adaptability of the current legal framework, and the fragmented and uneven implementation of EIBM across the EBCG community. The identified problem areas as presented in the *Problem Tree Figure 3* below include:

- Problem 1. EBCG efficiency in border management and return is undermined by ambiguities, gaps and unused opportunities.
- Problem 2. Frontex capabilities cannot sufficiently develop to respond to increasing needs and EIBM objectives.
- Problem 3. Development and implementation of EIBM is undermined by deficiencies in training, planning and Frontex quality control mechanism.

These problems are closely interlinked and rooted in a need for a more forward-looking approach, particularly on how to use the standing corps as a key resource for delivering on EIBM objectives and responding to potential long-term challenges.

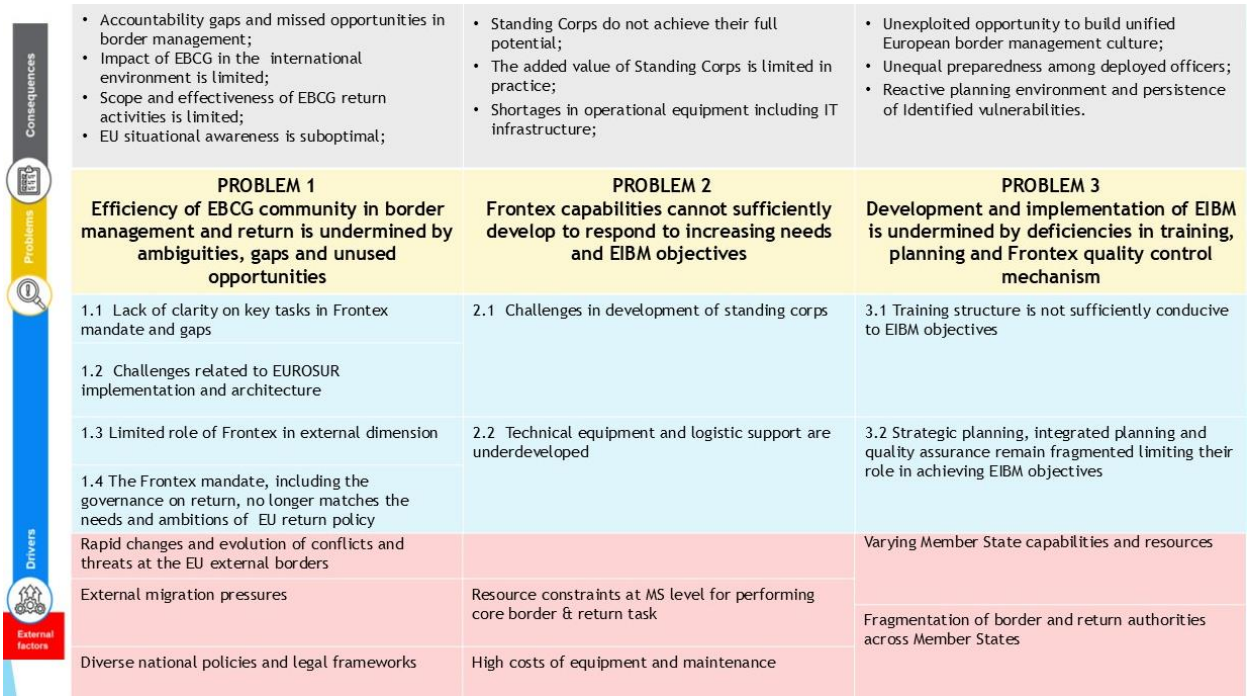
### 2.1.1 Problem 1 – EBCG efficiency in border management and return is undermined by ambiguities, gaps, and unused opportunities

The study accompanying the Impact Assessment has identified ambiguities and gaps in the division of tasks and consistency of responsibilities of Frontex, which go beyond the issues identified in the 2024 evaluation of the EBCG Regulation. These ambiguities and gaps are partially the consequence of the design of the EIBM which is based on the so called 'four-tier access control model' which requires that migration and security at the EU's external borders are managed through a layered approach i.e. measures in third countries, measures with neighbouring third countries, border control measures at the external borders, and measures within the Schengen area and return. Taking into account the

[21] Frontex Strategic Risk Analysis Report 2024.
[22] The latest Frontex data show that detections of irregular border crossings at the EU's external borders fell by over one-quarter (26%) in 2025.
[23] The latest Frontex data show that detections of illegal border crossings at the EU's external borders fell by over one-quarter (26%) in 2025.
[24] See p. 1 COM(2026) 45.

shared-responsibility model, combined with differences in Member States' national frameworks and operational practices, the mandate and status of Frontex – when they come up against the mandate and status of the Member States – create recurring uncertainties about the division of tasks and responsibilities within the EBCG community, which can affect operational effectiveness and accountability.

*Figure 3. Problem tree*



Under **tier 1** Member States are primarily responsible for actions to strengthen cooperation with third countries to prevent illegal migration, with the supportive role of Frontex depending on the existence of working arrangements (and potentially also status agreements) with the third countries concerned, but also on the interest of Member States in conferring Frontex tasks in relation to visa policy. Under **tier 2**, which is focused on the neighbouring third countries, Frontex plays a pivotal role by implementing status agreements on behalf of and with the support of all Member States. On the other hand, the role of Frontex is limited by uncertainties and lack of clarity concerning Frontex's exact powers in combating cross-border crime including migrant smuggling, information sharing, but also international law (e.g. applicable to maritime and Search and Rescue ('SAR') operations). Under **tier 3**, which concerns the EU's external borders, responsibility for border management falls primarily on the Member States, with operational support from Frontex depending as a general rule on requests from Member States; 'unsolicited' Frontex actions are theoretically possible only if a lack of action by Member States is believed to put the EU's internal security in jeopardy. The ambiguities observed under tier 2 involving combating cross-border crime, information sharing, and emergency interventions also affect the performance of Frontex under this tier.

Moreover, the limitations concerning the exercise of executive powers by the standing corps, which are crucial for border control or to contribute to combating cross-border crime, are a systemic problem, often flagged in vulnerability assessment and through the Schengen evaluation mechanism. This also adversely affects the 'hosting capacities' of the Member States, which need to ensure the availability of adequate assistance to the standing corps officers in order to comply with these requirements. Under **tier** 4, focused on the measures within the Schengen area, which is the exclusively responsibility of the Member States, the role of Frontex is limited to monitoring secondary movements and providing support in implementing return policy. On the latter, the effectiveness of Frontex's support for returns from the EU is hampered at different levels due primarily to structural capacity constraints, specialised staffing shortages, fragmented monitoring arrangements and limited operational access to key systems, which prevent Frontex from fully delivering on the increasing political ambition when it comes to returns.

If not addressed in a timely and effective manner, in the long term the ambiguities and gaps identified will undermine the readiness of the EBCG and overall effectiveness of its actions, making the EU susceptible to threats linked to the shifting geopolitical landscape. The accountability gaps are also likely to become exacerbated by i) the anticipated increase in human and technical capabilities that will be needed to respond to the level of threats resulting from this shifting geopolitical landscape, and ii) the expected increase in the number of enforceable return decisions by the Member States, following the implementation of the Pact, and in particular the Return Border Procedure Regulation, and adoption of the Return Regulation[26].

The accountability gaps under this problem result from many different drivers, described in greater detail in **Annex 5**, Section 1. The first **problem driver (PD1.1)** concerns **the lack of clarity on key tasks in the Frontex mandate and gaps**, which in turn manifests itself in **four thematic areas:**

1. The first thematic area concerns the **division of tasks in relation to external border management**, and in particular border controls, which stems from the fact that the concept of shared responsibility is not sufficiently clear. While reflecting national sovereignty, this concept limits Frontex's operational value and creates uncertainties about jurisdiction and responsibility during incidents and in general terms. This thematic area often leads to

[26] Proposal for a regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC.

restrictions on the executive powers of the standing corps or a lack of progress in ensuring effective access to the databases they need for their work, as well as potentially to missed operational opportunities that could arise from a greater freedom to act independently or of on own initiative respecting national sovereignty (examples could include faster and better tailored responses to operational developments, or possibly also a broader contribution to SAR operations at the sea – though limitations here also derive from international law).

2. Similarly, the lack of clarity affects the contribution of Frontex to the **fight against cross-border crime**, which is the second thematic area under this policy driver. Due to the multidimensional character of border control, covering both migration and security aspects, the EBCG frequently faces uncertainties over overlaps with law-enforcement competences, which differ among Frontex[27] and its national counterparts, but even among national law enforcement and border management authorities. Moreover, Frontex's contribution is further hampered by burdensome procedural and administrative limitations related to sharing operational personal data with Europol, a cooperation that is seen as instrumental in building the situational awareness required to better support the Member States in the fight against cross-border crime. These limitations originated largely as a result of an EDPS audit on Frontex debriefing activities[28], which resulted in inadequately low levels of data sharing by Frontex.
3. By contrast, the role that Frontex can already play in helping the Member States respond to instances of instrumentalisation of migrants raises question about another thematic area, i.e. the potential value of giving Frontex a mandate to support the Member States in responding to **emergencies and hybrid threats manifesting at the external borders**.
4. In a similar vein, the expertise of Frontex in risk analysis and identification of documents fraud, as compared to its limited use in practice by the Member States, could possibly be a reason for reinforcing its role in **EU Visa Policy and combating abuses of visa policy and residence permits to the EU**, being the fourth thematic area.

The second **problem driver (PD1.2)** extends to ambiguities observed in relation to the fragmented implementation of **EUROSUR** – the integrated framework for the provision of situational awareness to the EBCG and, as such, the key element of collective insight into the situation at the EU external borders. While the significant progress made so far in the implementation of EUROSUR should be acknowledged, there are lingering issues, like insufficient EUROSUR data quality or fragmented European situational picture, that require addressing, in order to make EUROSUR a sustainable and future-proof tool that effectively contributes to the pursuit of the objectives under second and third tier[29].

The third **problem driver (PD1.3)** concerns Frontex's **cooperation with third countries, CSDP missions and international organisations**, which is hampered by legal constraints. The closed list of international organisations provided in Article 68 of the EBCG Regulation prevents structured Frontex cooperation with important potential partners[30]. Frontex's effectiveness under this driver is also hindered by administrative burdens on strategically engaging with relevant third countries. For

[27] The EBCG Regulation's legal basis is Chapter 2 on policies on border checks, asylum and immigration in the Treaty on the Functioning of the European Union, which is distinct from the Chapter 5 on police cooperation covering traditional law enforcement authorities. Such a distinction between these two thematic areas is often not present in national contexts, creating an asymmetry between Frontex's competences and those of national authorities.

[28] EDPS Audit report on the European Border and Coast Guard Agency (Frontex) of 5 and 6 October 2022, EDPS Case number 2022-0749 (edps_-_23-05-24_audit_report_frontex_executive_summary_en.pdf).

[29] Interviews with: Frontex EIBM Division; Other EU agencies and bodies; Frontex OPC; Frontex (2025) EUROSUR: State of implementation and outlook; Report to the Council of the European Union.

[30] Interviews with Frontex INTEL Division, Frontex Operations Centre, Frontex STRAT Division; DG HOME; ICF (2023) Study supporting the evaluation of the EBCG Regulation and review of the standing corps.

working arrangements to allow for structured capacity building activities require extensive work on personal data protection safeguards including the prior approval of the European Data Protection Supervisor. This leads to significant delays before Frontex starts providing capacity building activities in third countries. Combined, these obstacles limit Frontex's ability to engage effectively and strategically with key external actors[31].

The fourth and final problem driver related to Problem 1 **(PD1.4)** concerns Frontex's effectiveness on **returns** and a range of structural, operational, and legal challenges that limit its ability to provide comprehensive, consistent and coordinated support to the Member States and to address complex migration flows. While Frontex has significantly increased its role in return operations in recent years, Frontex is not living up to its full potential and must improve efforts to fulfil its role as a key element in the common system for returns and becoming the Union actor for return. At present, fewer than one out in four persons illegally staying in the EU is effectively returned from the EU to a third country[32]. Data suggests that Frontex is unable to fulfil the demand for support for returns that exist today. In 2024, acting upon requests by Member States, Frontex supported around 40% of the effective returns that took place from the EU[33], which implies that Member States opted for other solutions, including own return operations, for almost 60% of all returns. This in turn implies that national or AMIF funding was frequently used to funding return operations, despite the possibility of relying on Frontex and using these funds elsewhere. This fragmentation, both operational and financial, is believed to have significant consequences for the EU and its Member States in terms of efficiency losses and synergies that have gone unidentified. While the Frontex-supported share of returns has increased significantly in recent years, several factors are already causing this growth to level off and plateau. These include internal factors such as available resources and expertise, but also EBCG-wide issues such as a lack of centralisation and coordination at EU level, or inadequate representation of return actors in Frontex's decision-making structures, and external factors such as ineffective cooperation with third countries where, or from where, Frontex is legally not allowed to support returns activities. Looking ahead, if unaddressed, these factors will continue to hinder Frontex's ability to meaningfully support an ambitious EU policy agenda on return and Member States needs and, in turn, undermine the credibility and effectiveness of the EU's return framework as a component of its migration management system. These issues will further be compounded by the entry into force, in June 2026, of the Return Border Procedure Regulation: Member States will request greater and more diverse support, which Frontex may struggle to provide with its current resources, degree of expertise, working methods, and EBCG-wide structures in place. Furthermore, Frontex's current mandate would limit Frontex's ability to potentially support the Member States on carrying out returns from third countries with which Member States have concluded an agreement pursuant to the Return Regulation. Further information on this driver is provided in **Annex 6**.

### 2.1.2 Problem 2 - Frontex capabilities cannot sufficiently develop to respond to increasing needs and EIBM objectives

The European Border and Coast Guard capabilities encompass the standing corps and technical equipment.

[31] While Frontex is already mandated to cooperate with CSDP missions (Article 68(1)(j) EBCG Regulation), uptake has been minimal (only two working arrangements signed with EUAM Ukraine (active) and EUBAM Libya (discontinued)). Contributing factors include a low level of awareness of the complementarity of mandates and what Frontex could offer to support CSDP missions combined with the legal constraints on the side of the CSDP mission mandates that do not foresee for example secondment of staff from Frontex to the mission. The latter is a consequence of initial mission mandates preceding Frontex or the 2019 EBCG Regulation and the updated mandate of Frontex. Awareness of complementarity seems to be lacking also at the time of renewal of CSDP mission mandates and leads to a missed opportunity.

[32] The overall return rate across the EU in the first half-year of 2025 stands at 24% (Eurostat).

[33] Frontex supported Member States with 56 263 returns out of 136 714 in 2024. (IRMA and Frontex evaluation report on the results of returns implemented in the second half of 2024, available at: Frontex Public Registry of Documents).

The **standing corps** is composed of different categories of personnel, reflecting different forms of recruitment and secondment, as defined in the EBCG Regulation:
**Category 1** consists of statutory staff of the European Border and Coast Guard Agency, recruited directly by Frontex and subject to the Staff Regulations and including: (1) staff deployed as members of the standing corps to carry out operational tasks under its command, (2) operational support staff and (3) ETIAS Central Unit staff.
**Category 2** comprises long-term seconded staff from Member States made available to Frontex for extended periods, whose work is coordinated by the Agency.
**Category 3** includes short-term deployed staff from Member States for specific operations or limited duration to reinforce operational capacity.
**Category 4** consisted of operational staff from Member States as reserve for rapid reaction to be activated for rapid border interventions. This category was phased out in 2025.

As explained in the study accompanying the Impact Assessment, various weaknesses in the current standing corps architecture have led to efficiency problems and the leeway for addressing them without modifications in its design, is limited. The weaknesses manifest in constant challenges in recruitment by Frontex and fulfilling the national quotas for Categories 2 and 3 as wells as disparities in skills and working conditions of the standing corps officers have undermined the effectiveness of the resources that Frontex could offer to the Member States as well as cooperation between the local resources and those seconded by Frontex. Currently, the annual recruitment capacity is estimated at a maximum of 1 000 recruits which is very ambitious[34]. Frontex also faces challenges in achieving a geographically balanced and representative workforce[35]. The competition for experienced personnel between Frontex and Member States affects all categories equally. Relying on Member States alone to recruit, train and nominate specialised officers is unsustainable in the long term, as it results in trade-offs between national priorities and EU objectives[36].

The vulnerability assessment mechanism and Schengen evaluations regularly identify staff shortages at the external borders. However, this is not followed up by the increased use of the standing corps, often owing to the absence of a level playing field in skills but also other reasons, addressed under Problem 1. Yet, given the high level of threats on external borders arising from the shifting geopolitical landscape, the architecture and the size of the standing corps has become inadequate to contribute to the 4 -tier access control model and EIBM objectives and be future proof, when one takes into account that its development is a lengthy process that needs to be implemented over time, with the multiannual financial framework carefully factored in.

While all these weaknesses result from one major driver (**PD2.1**), i.e. **challenges in developing standing corps**, tensions in different thematic areas contribute to this situation, which are described in more detail **Annex 5, Section 2**. In brief, the identified weaknesses stem from the limited labour market of professionals with a law enforcement background eligible to work as standing corps officers, the application of the Staff Regulations and its implementing rules to the operational staff of Frontex, which can lead to practical challenges for the standing corps' effective performance of their tasks during operations, and short-term career pathways leading to a loss of skilled personnel, high turnover

[34] Interview with Frontex Deputy Executive Director of Administration and Information Management, Human Resources and Corporate Services Division (HRS) and Information Management Division (SIM)).
[35] Data from 2025 shows the over-representation among Frontex staff of Greece (+18% deviation from total population), Poland (+16%) and Romania (+12%), while the three most under-represented countries are Germany (-17% deviation), France (-13% deviation) and Italy (-6%) Source: Frontex (2025) Recruitment and staffing data.
[36] Interviews with Frontex Capabilities Division, Frontex Information Management Division and Croatian authorities.

and structural renewal cycles in Frontex's workforce[37]. Uncertainties regarding the role and powers of standing corps officers vis-à-vis national authorities during joint operations also create significant operational inefficiencies. This ultimately hampers efforts to build a harmonised operational culture and limits Frontex's role in strengthening border management practices among Member States, hindering the goal of a unified European integrated border management system. Moreover, the **financial support system** established to support the Member States in developing Categories 2 and 3 has a number of shortcomings which have been identified by the Member States already in the 2024 evaluation. Additional limitations are due to inability of the system to reflect structural changes in the national authorities that are unrelated to staffing trends[38] or the absence of adequate recovery tools in case of discrepancies between the support received and the quota of officers provided. The overall adequacy of the financial support is also an issue[39]. Due to correction coefficients, which do not adequately account for changes in the costs of living, reimbursement levels are sometimes inadequate, and Member States are left to cover outstanding costs of Category 2 and 3 deployments[40].

The standing corps' efficiency is also limited by issues with Frontex support and monitoring staff (including the back-office coordination capacity), which cannot be guaranteed to keep pace with the growth of Frontex. The size of so-called non-deployable statutory staff which can be recruited by Frontex 'for the purpose of carrying out supportive or monitoring functions for the establishment of the standing corps, the planning and management of operations and the acquisition of technical equipment' (operational support staff), is limited in the EBCG Regulation to up to 4% of the 10 000 officers (400 in 2027).

Another major factor is persistent shortages in specialised profiles of deployed officers, which do not match Member States' operational needs and thus negatively affect mission success and Member States' confidence in Frontex's operational capabilities. Advanced-level document officers (ALDOs), debriefing officers, European coast guard functions officers, information officers, and motor vehicle crime detection officers are among the most sought-after profiles. There is also an increasing need to diversify return-related specialist profiles, and select, recruit and train in a dedicated way return specialists so that Frontex can meet Member States' growing needs and requests for support in achieving EU policy priorities in this field. While the profile shortage issue is closely related to Member States' training infrastructure constraints, Frontex's own standing corps-focused training, and the fragmented implementation of strategic and operational planning across the EBCG (and hence Problem 3), it is also an important part of the overall architecture of the standing corps, relevant for determining its added value and capacity to support the Member States.

**Technical equipment** used in operational deployments such as mobile border surveillance and border checks tools, vessels, vehicles, and IT systems remains the property of the contributing Member State or of Frontex, depending on the procurement and deployment arrangement, and is registered in the technical equipment pool for Frontex's operational activities. In line with the EBCG Regulation[41], the deployment of equipment must be aligned with the needs for technical equipment set out in plans for Frontex's operational activities but can only occur with the authorisation of the host Member State,

[37] ICF, 2026, Feasibility study to develop and assess potential options for the further reinforcement of the capabilities of the European Border and Coast Guard (EBCG) under Regulation (EU) 2019/1896, case study on standing corps Capability Development in the Annex to the study accompanying the Impact Assessment.
[38] For instance, Member States subject to enlargement of the Schengen area relocated staff for border activities to other authorities due to the decrease of their external border, therefore reducing the overall staff of their national border guards.
[39] See Case Study on Standing Corps Capability Development in the Annex to the study accompanying the Impact Assessment.
[40] ICF (2023); Study supporting the evaluation of the EBCG Regulation (EU) 2019/1896 and the review of the standing corps p. 110, p. 155; Survey with national authorities.
[41] Article 64 of the EBCG Regulation.

while Frontex is responsible for their coordinated, optimised use. The study accompanying the Impact Assessment collected evidence that there is a mismatch between planned technical equipment (TE) deployments and actual availability[42]. While there is a structural difficulty in aligning domestic resource planning with EU-level commitments as national technical equipment pools are typically tailored to national priorities and budget constraints[43], other factors also influence **underdevelopment of technical equipment and logistic support (PD2.2**), which are seen in the under-deployment of technical equipment (particularly visible for fixed-wing aircraft, helicopters and patrol vessels), adversely affecting the EIBM objectives. Insufficient anticipation of fluctuating operational requirements, incomplete capability planning and legal or operational bottlenecks within the procurement and deployment processes, are frequent issues. Uncertainty about asset availability a year in advance and lack of clarity on deployment locations complicate internal planning for equipment deployments, due also to the fact that data-sharing and communication systems are often outdated and incompatible across authorities, which negatively impacts coordination and information exchange. Additional issue, identified already in the 2024 evaluation of the EBCG Regulation[44] concerns the funding-based rules which in practice can create counter-efficient situations, where ISF-purchased technical equipment must be deployed in other MSs for a defined period, even if there is an Frontex Joint Operations in the same Member State.

Overall, the financing model requires further study and reflection, to assess Frontex's own cost modelling which indicates that over a long enough horizon purchasing surveillance aircraft could become more economical than leasing.

Frontex currently does not own or operate of its maritime assets. Similarly to aircraft, maritime vessels require significant logistical support and infrastructure for operation and maintenance, including a range of specialists, naval bases/docking facilities and shipyards. There are also legislative complexities related to registering, responsibility for operating and maintenance of such assets. Under international maritime law, a vessel is subject to the exclusive jurisdiction of the state whose flag it flies, and maritime vessels must fly the flag of a nation state. This means that the ship's home nation has the power to enforce its laws on the vessel and its crew, regardless of their location on the high seas ('flag state jurisdiction')[45].

Logistical constraints add complexity to deployments, affecting both the Member States and Frontex by reducing time for operational tasks and disrupting workflow continuity. Equipment, uniforms, and weapons must be collected from the scarce, designated locations, generating logistic burdens. For more details on this driver and underlying causes, see **Annex 5 Section 2**.

### 2.1.3 Problem 3 - Insufficient harmonisation in design and application of the EIBM

The EIBM, besides being an objective set out in TFEU[46], is the main tool for creating the synergies between the EU and the national level that are needed to efficiently manage the EU's external borders in the shared responsibility model. While an evaluation of EIBM strategic policy is scheduled for

[42] Interview with Frontex Equipment and Logistics Division.
[43] Some Member States interviewed highlighted that the equipment they possess does not always match the operational needs of Frontex missions. A few noted that the fact that domestic needs can override commitments made under EU funding rules, which can create tension between national priorities and obligations to Frontex. Others highlighted that deployment of equipment is often constrained by the availability of trained personnel, especially for maritime assets.
[44] ICF. (2023). *Study supporting the evaluation of the EBCG Regulation (EU) 2019/1896 and the review of the Standing Corps*.
[45] A mission pennant could provide some degree of clarity for assets and personnel deployed on vessels. However, most interventions take place outside territorial seas and may involve third countries that are not party to relevant international conventions (e.g. Turkey has not signed UNCLOS Convention). The attempts to create a unique European flag failed so far. In 2023, the European Commission launched a new study to explore European flag, but no follow-up action was taken.
[46] See Article 77(1)(c) TFEU.

2026-2027[47], the study accompanying the Impact Assessment demonstrated **insufficient harmonisation in the design and application of the EIBM**, due mainly to training deficits, inadequacy of the existing planning tools to overcome divergent operational procedures across Member States, and weak follow-up measures to ensure alignment with EIBM standards. The lessons learnt from the deployment of the standing corps to date, together with the challenges identified in the preparations for the implementation of the Pact demonstrate that delivering on this objective requires measures that, while respecting specific national situations, reduce divergence in operational practices and training and strengthen alignment with EIBM standards, thereby facilitating efficient cooperation in the protection of the external borders.

More specifically, the EIBM is implemented partially or in an uneven manner. This weakens coherence, efficiency, and preparedness across the EBCG. The border management operations, training of the standing corps and technical equipment are subject to different rules across the EBCG. As it emerges from the vulnerability assessment reports and Schengen evaluation, there are important gaps in advanced skills which may suggest inadequate training[48]. The study accompanying the Impact Assessment confirms that **training system architecture** is insufficient to keep the pace with the development of Frontex. This is due to insufficient resources, limitations in the scope of the offered training, especially for return-related functions, a lack of clear rules on recognising work at Frontex at the national level as part of staff's career progression, but also infrastructure problems and slow adaptability of curricula (e.g. to reflect practical exercises, involve neighbouring third countries or include findings from risk analysis products).

Moreover, the **strategic and operational planning** for EIBM is fragmented. For instance, the absence of a legally binding requirement for Member States to align their national strategies with the technical and operational EIBM strategy limits Frontex's ability to oversee implementation, as it lacks the authority to enforce compliance or trigger corrective measures in cases of underperformance. This gap also has a negative impact a coherent and forward-looking capability roadmap. A further gap concerns the limited integration of Frontex's risk analysis products into strategic and capability planning cycles. Despite the legal obligation[49] that risk analyses cover all tiers of EIBM to enable pre-warning and preparedness, current outputs largely focus on migratory flows at external borders, with insufficient coverage of returns, third-country conditions, and intra-Schengen movements. In the absence of an integrated forward-looking framework, there is no systematic link between operational risk analyses and capability development planning. The lack of a clear policy framework and division of roles, both at headquarters and in the field, makes it difficult to ensure that operational planning cycles are information-led and mutually reinforcing. The Management Board's role in steering long-term planning has also been described as reactive, further weakening collective accountability for shared capability development under the EBCG framework[50].

Finally, the lessons learnt from quality control mechanisms such as vulnerability assessment and Schengen evaluation mechanism are underused. The enforcement of **vulnerability assessments** features structural weaknesses that undermine the evidence-based planning and alignment of resources. There is no early warning system to identify structural gaps and promote smoother alignment with EIBM standards in EU candidate countries ahead of accession. Moreover, it does not include return and enforcing recommendations issued in the vulnerability assessment process remains incomplete in practice. There is also a lack of a clear structure allowing for quality assurance of the

[47] It is expected in 2027, meaning it will not be possible to deliver a formal evaluation of the strategic policy adopted in 2023 earlier.
[48] A VA simulation exercises carried out in 2025 at three airports pointed to gaps in skills to detect document fraud.
[49] Article 29(3) of the EBCG Regulation.
[50] 2024 evaluation of the EBCG Regulation and targeted stakeholder consultations carried out for the supporting study.

actions taken by Frontex.

All these issues are captured in Problem 3 and explained more in detail in Annex 5 Section 3, under problem drivers related to **training architecture (PD3.1)**, and **(PD3.2)** concerning **strategic and integrated planning as well as quality assurance**.

## 3. WHY SHOULD THE EU ACT?

### 3.1. Legal basis

The proposal seeks to ensure coordinated and effective management of the EU's external borders and returns by removing gaps and ambiguities, strengthening Frontex's human and technical capabilities and promoting a coherent implementation of EIBM. These areas are already covered by the EBCG Regulation meaning that the proposal will require the same legal basis as the current provisions. The legal basis for the EBCG Regulation is provided by Articles 77(2)(b) and (d), and by Article 79(2)(c) of the TFEU. Article 77(2)(b) empowers the EU to establish legislation governing checks on individuals crossing external borders. Article 77(2)(d) supports the adoption of measures required for the gradual establishment of an integrated management system for external borders. Article 79(2)(c) authorises the implementation of measures to address illegal migration, including removal and repatriation of individuals residing without valid authorisation.

### 3.2. Subsidiarity and proportionality

Effective management and control of the EU's external borders is in the interest of all Member States. The abolition of internal border controls within the Schengen area means that external border management directly affects the functioning, security, and integrity of the EU as a whole[51]. Recent geopolitical developments have further increased the need for a stronger EU response, adapted to the new circumstances. These comprise sustained migratory pressure at certain sections of the external borders, including instability at the EU's eastern borders and the rise of hybrid threats, smuggling and criminal networks using new tactics, the growing relevance of digital tools for surveillance and situational awareness, and the emergence of crisis situations that may simultaneously affect several Member States and challenge conventional border management strategies. All these elements underscore the need for greater resilience and coordination of current border management systems.

Ensuring the return of individuals without a legal right to stay is an EU priority. Despite the increased involvement of Frontex, the number of effective returns to third countries remains low[52]. Many of the current shortcomings in the application of the EU's return policy stem from limited coordination between national systems, a challenge that requires a focused collective response at the EU level. EU-level action, in particular, through Frontex, ensures a common framework, operational support, pooling of expertise, and streamlined third-country contacts, enhancing Member States' capacity to implement returns effectively and in line with EU law. The increased efficiency gains envisaged from the new legal framework on return (the Return Regulation and the proposal on digitalisation of case management for return, readmission and reintegration) is expected to lead to an increase in overall returns. Frontex is already acting as a major player in returns from the EU and its role, in planning and strategically coordinating coherent EU level actions, needs to match the increasing ambitions for the common system for returns. Such coordinated action cannot be sufficiently achieved by Member States

[51] See Recital 6 of Regulation (EU) 2016/399 of the European Parliament and of the Council of 9 March 2016 (Schengen Borders Code).
[52] European Commission (2024) State of Schengen Report 2024.

acting in isolation, making EU-level measures necessary and more effective.

The need for coordinated action is evident not only in situations of disproportionate migratory pressure on certain Member States, but also in potential spillover effects through secondary movements and beyond. Emerging cross-border risks require constant planning and harmonised standards that only EU-level coordination can provide[53]. As per Article 7 of the EBCG Regulation, implementing EIBM is a shared responsibility of the Member States and Frontex. In this spirit, it is necessary to take action to reinforce EBCG capabilities, both in terms of the manpower and technical assets. In particular, the involvement of the European Border and Coast Guard Agency allows for pooling of expertise, common risk analysis, interoperability of systems, and rapid deployment of technical and human resources, which individual Member States may not be able to mobilise in a timely manner on their own. The reinforcement of the standing corps is a chance of bringing benefits to the national level. Enhanced harmonisation of rules governing operational support, clearer allocation of responsibilities between Frontex and Member States, and reinforced coordination mechanisms at EU level increase the effectiveness of national border authorities**,** rather than replacing them.

The added value of EU-level coordination has been demonstrated in practice through joint operations, rapid border interventions, and coordinated responses to sudden migratory or security-related developments. Frontex's role in supporting return operations, training, vulnerability assessments, and cooperation with third countries has further shown that EU-level action enhances consistency, mutual trust, and solidarity among Member States, while contributing to the uniform application of EU law. The considered measures do not go beyond what is necessary to achieve the general and specific objectives.

## 4. WHAT SHOULD BE ACHIEVED?

### 4.1. General objectives

The general objective:

- **GO1**. Ensure the development and implementation of the European integrated border management in line with Article 77(1)c) of the Treaty on the Functioning of the European Union, encompassing well-coordinated and effective management of the EU's external borders, returns, visa policy and measures at the external borders contributing to security in the EU in order to increase the effectiveness of the EBCG.

### 4.2. Specific and horizontal objectives

The specific and horizontal objectives described below are a response to the problems identified in Section 2.

- **SO1**. Ensure Frontex's effectiveness in supporting Member States (and Schengen associated countries) in managing the EU's external borders, including cooperation with various actors (Member States' authorities involved in combating cross-border crime, returns and visa, third countries, EU agencies, international organisations), and ensuring that the effectiveness of returns, the prevention of illegal arrivals, and situational awareness via EUROSUR is enhanced.
- **SO2**. Strengthen the EBCG human and technical capabilities, including improving the operational effectiveness and efficiency of the standing corps and procedures applicable to the technical capabilities;

[53] Frontex (2025) Annual Risk Analysis Report 2025/2026.

- **SO3**. Ensure coherent design and implementation of EIBM across EU Member States based on harmonised training, synergies in planning, reinforced quality control processes and standing corps of 30 000 officers equipped with the state-of-the-art equipment;

- **HO1**. Ensure that the oversight mechanisms in Frontex and the EBCG remain adequate to the tasks resulting from the development and implementation of EIBM.

**Horizontal issue of adequacy of governance and oversight**. The 2024 evaluation of the EBCG Regulation did not recommend any changes to the oversight architecture, but it did point out some areas affecting the performance of the existing structures.

The study accompanying the Impact Assessment confirmed the existence of practical difficulties affecting how Frontex performs its obligations related to investigating incidents in the activities of Frontex. Overall, Frontex's oversight bodies (i.e. the Fundamental Rights Office (FRO), Internal Controls Office (ICO), Internal Audit Control (IAC), and the Data Protection Office (DPO)) reported limited resources to perform their tasks.

These issues will be partly addressed through non-legislative efforts, primarily by prioritising the existing staffing and resourcing of these bodies in line with their tasks. Furthermore, the long-term fitness of the oversight framework of Frontex and the EBCG, will depend on focusing on enhancing the effectiveness of the existing components of the framework in place.

## 5. WHAT ARE THE VARIOUS OPTIONS TO ACHIEVE THE OBJECTIVES?

### 5.1. What is the baseline from which options are assessed?

The baseline assumes persistent structural problems (legal gaps, ambiguous legal framework, and mandate limitations) as well as entrenched practices (e.g. returns, data sharing, strategic planning, or equipment procurement) that demand multi-actor coordination to resolve. The baseline scenario also assumes that at least some of the strategic risks and challenges identified in the Strategic Risk Analysis Report (Frontex 2024)[54] will materialise, putting pressure on the entire Schengen area. As such, the baseline scenario reflects on how and to what extent the measures and proposals adopted after 2019 which are being still implemented or negotiated, would address the identified problems. It also takes into account the use of the tools at the disposal of Frontex, in particular Management Board and Executive Director decisions, to compensate gaps or provide guidance. In addition, the baseline reflects that the operating environment and the political/legal framework have evolved materially since the evidence cut-off of the 2024 evaluation (data until end-2023). The full implementation of the Pact on Migration and Asylum (applicable as of June 2026), the completion of negotiations on the Return Regulation and the intensification of hybrid threats and instrumentalisation and weaponisation of migration reinforce the need for a more responsive EBCG capacity. Under the baseline, Frontex and the EBCG community would continue to rely primarily on incremental non-legislative adjustments and existing tools, which, while improving specific processes, are not expected to resolve the structural limitations identified in Problems 1-3 nor to provide sufficient flexibility and surge capacity to respond to rapidly evolving operational needs.

Some issues covered by policy drivers **PD1.1**, **PD1.2** and **PD1.4** (**Problem 1**) which have been identified in the Action Plan and the Roadmap[55], would continue to be subject to non-legislative measures (e.g. Frontex Management Board decisions). In particular, for **PD1.1,** the staged roll out of the contingents under the Frontex Chain of Command (FC2) concept based on the Management Board

[54] Strategic_Risk_Analysis_2024_Report.pdf
[55] A document prepared in cooperation between the Commission and Frontex.

decisions[56], is to be finalised at the end of 2026. It will contribute to increasing trust and bringing more stability and predictability for standing corps[57]. Frontex's presence at border crossing points is expected to increase over time, mainly to support the introduction of the Entry-Exit System[58] and to support second-line checks (especially document fraud expertise). However, first-line checks by Frontex officers would remain limited, with access to databases varying across Member States. The exercise of executive powers in the context of combating cross-border crime would remain unchanged.

Cooperation with Europol would continue to be hampered by the perceived lack of clarity over the correct way to implement the existing rules on exchanging operational personal data between the two Agencies, as mentioned in audit findings and recommendations by the EDPS. Frontex's role in supporting visa policy would remain limited to ad hoc initiatives while Frontex's involvement in emergency response actions would remain unclear. Frontex contributions to response to hybrid threats would be focused on addressing the instrumentalisation and weaponisation of migration, and the use of EUROSUR as a situational awareness tool in its current scope.

For **PD1.2,** the full implementation of EUROSUR would be completed in 2027 allowing the automated provision and sharing of statistical data and information on incidents, which would accelerate the decision-making process on the right operational response. The technical issues related to the functioning of EUROSUR would continue to be addressed in the EUROSUR Handbook which would be subject to revision in 2027. The other issues, not directly captured in the 2024 evaluation could be subject to ad hoc actions and initiatives (e.g. new Management Board decisions, decisions by the Executive Director, guidelines and best practices issued by Frontex, operational plans).

For Frontex's footprint in external dimension (**PD1.3**), status agreements and working arrangements in the area of border management would remain the only framework of cooperation for Frontex to support third countries. Working arrangements would remain subject to the current administrative and data-protection compliance steps (including, where relevant, prior involvement of the EDPS), which can result in delays before operational cooperation (including capacity building and information-sharing modalities) can start. Frontex would continue being one of the possible providers in technical cooperation projects in third countries and Frontex would be able to cooperate structurally with the international organisations specifically listed in the Regulation, while cooperation with CSDP mission would be, in principle possible but limited.

Finally, for returns **(PD1.4)**, Frontex would retain its current mandate to support the Member States on return, however within a changing and more ambitious legislative landscape, due to the entry into force in June 2026 of the Return Border Procedure, the Return Regulation, where political agreement between the co-legislators was reached on 1 June 2026 and taking into account the possible adoption of the proposal for the digitalisation of case management in the areas of return, readmission and reintegration. At the Member State level, the existing issues, including fragmentations and operational inefficiencies, would persist, while the number of returns to be implemented is expected to grow under the new legal situation, without sufficient resources both at the national and EU level to handle them and to respond to the periodic surges.

[56] Management Board Decision 45/2023 of 22 November 2023 on the new organisational structure of Frontex and Management Board Decision 7/2025 adopted on 26 March 2025 on amending Management Board Decision 45/2023, leading to establishment of seven border management and two thematic return-profile contingents.
[57] The implementation of the Executive Director Decision No R-ED-2024-112 on the Deployment and Rotation system for category 1 and 2 standing corps officers is expected to allow for sufficiently long deployments (minimum 2 years), also justifying the investment by the hosting Member State in the training e.g. access to the databases.
[58] The Entry/Exit System (EES) is Europe's new border management system for registering non-EU nationals travelling for a short stay, each time they cross the external borders of 29 European countries. Starting from 12 October 2025, Member States progressively roll out the system at their external borders over a period of six months.

Frontex's capability gaps (**Problem 2**) would persist with regard to the standing corps and technical equipment (**PD2.1 and PD2.2**), affecting Frontex readiness to support Member States in EU border management and returns. The short-term career pathways available would continue the high turnover in Frontex's workforce, putting a strain on Frontex's long-term organisational stability. Disparities in working conditions and uncertainties regarding the role and powers of standing corps officers in dealings with national authorities during joint operations would persist, undermining the objective of developing and implementing EIBM standards. Shortcomings related to the application of the Article 61 financial compensation mechanism would remain unsolved. Mismatches between the availability of specific officer profiles and the operational needs of Member States, together with constrains on available equipment and logistical support, would continue to jeopardise the standing corps' readiness for deployment. The solutions pertinent to **PD2.1** and **PD2.2** offered by the decisions of the Management Board would remain limited (e.g. decision establishing operational horizontal functions and activities within the standing corps)[59]. The human resources available to the EBCG, as well as its overall capital in terms of expertise and field experience, will predictably reach a ceiling in 2027, when the number of 10 000 deployable officers is met. According to this scenario, it may lose momentum, stagnate, and decrease in the years thereafter. This would result in an effective decline in the EBCG's overall ability to respond to situations and challenges at the external borders, including in terms of its ability to deploy officers that are well-trained, interoperable among national and EU services, and able to deploy rapidly and provide immediate support, particularly in times of crises.

Finally, different forms of uneven take up of EIBM (**Problem 3**) would continue to affect the efforts to build a harmonised operational culture and improve the efficiency of the EBCG in the short and long term. The solutions for training (**PD3.1**) would continue to rely on the three-tier EBCG Academy concept[60] and temporary solutions, such as the establishment of an 'operational trainer' function within the standing corps. However, the scalability and timing of such benefits will depend on the finalisation of the EBCG Academy training framework and will be limited to a duration of pilot exercise, such as that on operational trainer function[61]. The system will continue to face capacity and staffing challenges as well as problems in ensuring adequate, high-quality and uniform training opportunities. However, the process of establishing the new training framework only started recently and some of the measures it provides are temporary, making the assessment of the impact difficult. Therefore, in the absence of harmonised training standards, divergent training availability and quality would persist, limiting interoperability across the EBCG. For EIBM planning cycles (**PD3.2**) the baseline would persist with uneven maturity and weak coordination of national strategies for EIBM and capability planning, weak links between national strategies and recruitment and capability development cycles and delays in submitting inputs making the strategic planning only partially information-led, which would only allow for limited systematic integration of risk analysis into capability development and investment planning. The quality assurance would take place, in addition to the Schengen evaluation mechanism, via vulnerability assessments focusing on the external borders but its take-up in the context of different strains of work of Frontex would remain limited and its enforcement would be limited in case of persisting deficiencies. The Management Board would oversee the effectiveness of Frontex actions, but underrepresentation of return authorities would hinder oversight in the area of returns.

While the 2024 evaluation reached positive conclusions on several aspects of Frontex's performance, its scope and evidence base largely reflect a pre-Pact operating environment. As such, it does not fully capture the scale of operational, legal and organisational challenges arising from the forthcoming

[59] Management Board Decision 17/2025 of 12 June 2025

[60] Frontex Management Board meeting. Explanatory note: Training delivery: Towards sustainable solution, Ref. Ares(2025)230171 – 13/01/2025.

[61] Frontex Management Board meeting. Explanatory note: The concept of trainers for the European Border and Coast Guard Academy, Ares(2026)233415 – 09/01/2026.

application of the Pact on Migration and Asylum, the evolving return framework and the increased reliance on Frontex for sustained, large-scale operational support. Under the baseline scenario, these challenges would persist and intensify, limiting Frontex's ability to respond effectively without structural changes.

## 5.2. Description of policy options

Three identified **policy options (PO)** encompass both legislative and non-legislative measures to achieve Specific Objectives and deliver the General Objective to develop and implement an European integrated border management that will increase the effectiveness of the EBCG.

Policy Options (PO) are presented separately to reflect different levels of ambition and of legal integration and enforceability. While PO1 focuses on targeted clarifications and adjustments within the existing cooperation paradigm and logic, PO2 entails a qualitative shift towards more harmonised and enforceable EIBM implementation across Member States. Although certain measures could be combined, considering them separately offers a clearer assessment of the impacts resulting from different levels of EU intervention. PO3 implies the most ambitious measures under which EBCG functioning would rely on standing corps and a central role for Frontex.

All **policy measures (PM)** are numbered. The numbering vertically follows the policy options (PO) by policy driver (PD) and can go across different thematic areas (Frontex mandate, returns, standing corps and EIBM planning and quality assurance). **Annex 8** provides a summary overview of the baseline scenario and proposed policy options and measures they encompass. **Annex 10** complements the reasoning behind the gradual increase of the standing corps, as proposed under PO2 and PO3. **Annex 12** provides an overview of discarded measures.

### 5.2.1 Policy option 1: Targeted modifications to address shortcomings and gaps

**Policy Option 1** (**PO1**) targets EBCG effectiveness by addressing shortcomings identified in the 2024 evaluation of the EBCG Regulation and the subsequent implementation issues, while increasing the overall preparedness of the EBCG for rapid-onset crises. Under this option, the current pace of EIBM development and implementation EIBM would be maintained.

#### 5.2.1.1 Policy measures relevant to Problem 1

Under **PO1**, **Problem 1** would be addressed by a mix of targeted amendments in the EBCG Regulation, within the limits of the current mandate, and non-legislative measures, to boost the performance of Frontex in the first three tiers of the access control model and EUROSUR, and increase the overall efficiency of the EBCG in returns.

For **PD1.1** (**Frontex mandate**), policy measures will focus on the following two thematic areas[62].

**Border controls**: with **PM 1.1.1** to better recognise executive powers of the standing corps; **PM 1.1.2** to broaden the list of Frontex tasks; **PM 1.1.3** to mandate modifications in relevant national policies to ensure effective access for Frontex officers and assets (such as vessels) to perform frontline duties – this includes the use of national databases; **PM 1.1.4** to reinforce the chain of command and contingent-based operational concept; **PM 1.1.5** (non-legislative) to ensure appropriate funding to increase the hosting capacities of Member States, and **PM 1.1.6** (non-legislative) to modify EU and national policies ensuring access for Frontex frontline duties and encouraging action on host Member

[62] No measures under O1 are proposed for two other thematic area, namely visa policy and emergencies/hybrid threat.

States' behalf.

**Combating cross-border crime**: with **PM 1.1.7** to clarify the Frontex's role in countering cross-border crime; **PM 1.1.8** to clarify the analytical and situational awareness-support functions of Frontex; **PM 1.1.9** to enhance sharing operational personal data between Frontex and Europol/Eurojust while maintaining data protection safeguards, and **PM 1.1.10** (non-legislative) to complement Frontex-Europol/Eurojust cooperation, for instance, through the use of standard operating procedures and data protection awareness initiatives. A similar level of ambition would apply to **EUROSUR** (**PD1.2**), with a number of technical legislative amendments (**PM1.2.1- PM1.2.8**). For more details see **Annex 8**.

The most innovative element under **PO1** would concern broadening the list of specific incidents for which data is collected in the situational pictures (**PM 1.2.6**). For **PD1.3 (external dimension**) the following policy measures (PM) would be proposed: **PM 1.3.1** standardises Frontex's working arrangements with third countries/international organisations, mirroring the EUAA model; these would remain practical cooperation agreements, needing Commission's prior approval without being treated in practice as administrative arrangements on the transfer of personal data that are subject to EDPS approval; **PM 1.3.2** (non-legislative) to encourage the update of existing working arrangements to the new mandate of Frontex including EUROSUR; **PM 1.3.3** (applicable exclusively to cooperation with third countries) to simplify the rules for deployment of Frontex Liaison Officers in third countries, and **PM 1.3.4** (non-legislative) to enable pre-arrival checks at airports in third countries under existing operational plans. **PM 1.3.5** (applicable exclusively to cooperation with CSDP missions) to foster closer cooperation and a greater understanding of complementary mandates, while leveraging Frontex's EIBM expertise in CSDP missions with a border management component; **PM 1.3.6.A** applicable exclusively to cooperation with international organisations (e.g. NATO) with whom Frontex could cooperate.

A number of measures would be proposed for **PD1.4**, in particular: **PM 1.4.1A** focusing on enhancing the coordination of operational return activities, such as by adopting EU-level guidance documents, and **PM 1.4.10** adjusting Frontex's return operational plans; **PM 1.4.2A** mandating regular information sharing, or **PM 1.4.6** further clarifying in the legal text the existing preconditions for Frontex to assist Member States with return operations or reintegration support. **PM 1.4.8** to increase Frontex's support on returnees' identification and reintegration, including strengthening Frontex's role in identification missions with third countries; **PM 1.4.5A** to create a legal base for reintegration and to streamline Frontex's related activities; **PM 1.4.7** re-focusing and strengthening the EU Reintegration Programme; **PM 1.4.9** to enhance the interoperability of existing digital tools to manage return; **PM 1.4.11** encouraging the provision of more training and capacity-building activities on return to partner third countries; **PM 1.4.12** increasing the number and specialisation of Frontex staff working on return; and **PM 1.4.13A** reviewing the deployment of EU Return Liaison Officers. **PM 1.4.4** to ensure that this revamped framework retains adequate monitoring and quality assurance, including expanding the vulnerability assessment for the EU external borders to cover return and to better integrate it into EIBM risk analysis; **PM 1.4.3** adjusting the EU's return monitoring system to ensure it has adequate resources and to ensure a similar level of obligations between Frontex and Member States, while enhancing Frontex's own internal oversight mechanisms and focusing on more delineated governance on return and borders, around the operational activities.

#### 5.2.1.2 Policy measures relevant to Problem 2

For the Frontex capabilities addressed under **Problem 2**, **PO1** proposes the following policy measures (PM) per thematic area under **PD2.1** (challenges in development of standing corps).

**Standing corps architecture: PM 2.1.1** to triple the standing corps to 30 000 officers to increase Frontex's capacity to support Member States in border management and return. Under this PM the current Categories 1, 2 and 3 would be increased proportionally in line with the pace of growth envisaged under Annex I of the EBCG Regulation, reaching 30 000 officers by 2041. The Member States' annual contributions for standing corps Categories 2 and 3 would also be proportionally increased, in line with the logic set out in Annexes II and III. The need to expand the standing corps under this option (and even more under the subsequent ones) would reflect the increase of tasks in the following areas: *returns* (capability to lead and carry out operations leading to increased demand for return counsellors, escorts, coordinators, and monitors); *cross-border crime* (expanded detection and prevention functions at borders increasing demand for investigative, analysis, and surveillance profiles (constant across the options)); *strategic and operational planning* (stronger EU-level planning capacity and pooling to ensure coherent capability development and surge planning); *training and qualification system* (an expanded instructor base and training offer to deliver and absorb the expanded responsibilities). **PM 2.1.2** to revise the limitations applicable to statutory staff dedicated to 'supportive or monitoring functions'. This may include increasing the current ceiling for operational support staff, clarification on the professional functions it covers, and tasking the Management Board with adjusting operational support functions to match annual capability needs assessments. **PM 2.1.3** to clarify the concept of 'deployment' along the lines of the existing Executive Director Decision[63]. **PM 2.1.4** to correct shortcomings identified under Article 61 (financial support mechanism) paired with non-legislative measures such as harmonised templates and clearer timelines for data submission and verification. **PM 2.1.5** (non-legislative) to help addressing gaps in seconding and nominating Category 2 and 3 (e.g. early warning mechanism and deployment handbook).

**Employment conditions** (under **PD2.1**): **PM 2.1.6** to clarify that passing the training is mandatory for continuing employment with Frontex. **PM 2.1.7** to adjust the relevant delegated acts on work pattern (shift work, stand-by duty) to operational reality and to provide compensation scheme for particularly difficult or risky working conditions. **PM 2.1.8** the revision of the definition of the place of employment in the EBCG Regulation, to allow, as a general rule, the place of deployment to become the place of employment.

**PO1** includes only one policy measure on **technical equipment** (**PD2.2**): **PM2.2.1** to improve coordinated implementation of EU border-management IT systems by increased legal certainty, with more structural interventions addressed under **PO2/PO3**, in line with their more integrated approach.

#### 5.2.1.3 Policy measures relevant to Problem 3

For training structure, strategic and integrated planning cycles and quality assurance – which were identified as the main pillars of EIBM under **Problem 3** and grouped under **PD 3.1** and **PD3.2** –**PO1** includes the following policy measures per thematic area.

**Training structure** (under **PD3.1**): **PM 3.1.1** to support and strengthen consistent integration and application of the Common Core Curricula. **PM 3.1.2** to develop specialised (sub)profiles for trainers[64] in key operational domains (e.g. return escorting, document checks, or border surveillance). **PM 3.1.3** to introduce voluntary, scenario-based joint training exercises in key operational areas (e.g. on hybrid threats), open, where appropriate, to candidate and potential candidate countries. **PM 3.1.4** to introduce a mandatory common pre-deployment training for Category 2 and 3. These would be complemented by measures to: consolidate and stabilise entry-level training (**PM 3.1.5**); expand the trainer pool (**PM 3.1.6**), reinforce return component in training (**PM 3.1.7**); expand the existing specialised training

[63] Decision 112/2024 on the deployment and rotation system of the standing corps officers Category 1 and 2.

[64] Training as an operational function of the standing corps would be formally recognised enabling the structured use of standing corps officers as trainers in support of Frontex's activities.

modules (**PM 3.1.8**); improve the recognition of Frontex's certificates for career progression and qualification in Member States (**PM 3.1.9**); and ensure that adequately trained and experienced officers are deployed for key specialist roles (**PM 3.1.10**). Policy measures under this option would include legislative and non-legislative ones.

**Strategic and integrated planning** (under **PD3.2**): policy measures proposed under this option would aim to strengthen coherence, comparability and transparency across Member States and would be exclusively non-legislative **(PM.3.2.1-PM3.2.6)**. For more details see **Annex 8**.

**Quality assurance** (under **PD3.2**): **PM 3.2.7** to ensure completeness of the vulnerability assessment process (in particular, to include return logistics once a return decision has been issued) while **PM 3.2.8** would expand the geographical area concerned by allowing for voluntary participation in vulnerability assessments of EU candidate and potential candidate countries.

### 5.2.2 Policy option 2: Towards a more integrated EBCG – Improving the harmonised implementation of EIBM

**Policy Option 2** (PO2) largely builds on measures proposed under **PO1** but goes a step further by proposing measures to seize the unused opportunities and thus to match the level of ambition in other policy areas (in particular return). With a new category of standing corps and reinforced training, it significantly changes the approach to shared responsibility, transforming the EBCG from a set of fragmented and reactive systems to a more harmonised and EIBM-based structure that is better equipped to face the volatile geopolitical situation. Under this option the development of technical equipment would be supported by a mix of legislative and non-legislative measures; training offered to different categories of the standing corps as well as EIBM planning cycles and quality assurance would be significantly reinforced.

#### 5.2.2.1 Policy measures relevant to Problem 1

Policy measures (**PM**) proposed under **PO2** to address **Problem 1,** will be as follows: For two thematic areas of the **PD1.1** i.e. **border management** and **combating cross-border crime** the proposed measures would be the same as under PO1. For the two remaining thematic areas under this problem driver, i.e. **emergencies and hybrid threats**, and **visa policy**, **PO2** would propose **PM1.1.11** to reflect specific coordination mechanisms for different types of emergencies in operational plans (OPLANs); **PM1.1.12** to ensure that there is a working arrangement between Frontex and the European Commission's Civil Protection and Humanitarian Aid Operations Directorate-General (DG ECHO) determining conditions of cooperation in relation to emergencies impacting external borders; **PM1.1.10** to oblige Frontex to prepare dedicated risk analysis products relevant to visa policy on a regular basis. Finally, with **PM 1.1.11**, Frontex would be encouraged to develop a new visa support office tasked with providing training sessions on detecting fraudulent documents and identifying visa fraud cases and helping to interested national authorities with combating abuses of the visa policy and residence permits to the EU. As regards policy measures relevant for **PD1.2** on **EUROSUR**, PO2 adds three policy measures to the PO1 proposal: **PM 1.2.9** to address the gaps related to the processing of personal data for the purposes of EUROSUR; **PM 1.2.10** to include statistical and anonymised data from the social media monitoring; and **PM 1.2.11** to ensure that data quality reported in EUROSUR is improved. For **PD1.3** relating to the **external dimension**, **PM1.3.6A** (relevant for cooperation with international organisation) would be replaced by **PM 1.3.6B**, where the closed list of the international organisations would be removed (not replaced) allowing such cooperation subject to Management Board approval. In addition to the measures proposed under PO1 (**PM 1.3.1, PM 1.3.2, PM 1.3.3**, **PM 1.3.4**, **PM 1.3.5**) another policy measures would be proposed: **PM 1.3.7** increase Frontex's role in EU-funded border management projects in third countries.

With regard to **PD1.4** (**returns**), the following policy measures would be proposed to **complement or expand upon** those listed under **PO1**: **PM 1.4.14B** making Frontex the EU's main operational actor for all EU-funded and/or EU-coordinated return operations and related pre and post return activities; **PM 1.4.1B** centralising EU return planning and coordination within Frontex, including resource allocation and a 24/7 Return Support Desk; and **PM 1.4.2B** requiring Frontex to collect and regularly present return-related statistical data; **PM 1.4.17B** reviewing Frontex access rights to the Schengen Information System to develop capacities in relation to identification of third-country nationals, as well as setting up a SIRENE office in Frontex; **PM 1.4.5B** to create the legal base for Frontex's broader responsibility for reintegration efforts from the EU, as well as for assuming that role in the digitalisation of return, readmission and reintegration. Frontex would also provide structural support for return counselling and reintegration counselling across the EU (**PM 1.4.18**); **PM 1.4.13B** enhancing Frontex's return-related support to partner third countries by introducing Frontex Return Liaison Officers and **PM 1.4.16B** to allow the possibility, under strict conditions and safeguards, for Frontex to support, organise, and coordinate return actives in or from third countries, including return operations; **PM 1.4.15** ensuring proper oversight of the new return framework through uniform monitoring standards for Frontex and Member States, as well as adequate_internal governance and oversight within Frontex. For **PD1.4** – **thematic area on governance in returns** – **PO2** comprises legislative and non-legislative measures (to be adopted as Management Board decisions), to ensure that return is better managed through the Management Board, while maximising the use of existing structures (e.g. working groups). In particular, **PM 1.4.19B** to reinforce the role of the executive board and strengthen the coordination between preparatory working groups and the Management Board; **PM 1.4.20** to introduce internal rules in Frontex to strengthen coordination between Frontex Working Groups (such as the HLRTR for strategic coordination, and the Working Group on EIBM for quality assurance) and the Management Board; **PM 1.4.21** to establish a dedicated working group on returns to address for instance strategic planning, technical or operational issues and report regularly to the Management Board to ensure operational focus.

#### 5.2.2.2 Policy measures relevant to Problem 2

The **PO2** includes the following policy measures (PM) for Frontex capabilities addressed under **Problem 2**. Under **PD2.1** encompassing i) **standing corps architecture**, and ii) **employment conditions** as separate thematic areas, the following PMs from PO1 would be preserved: **PM 2.1.2, PM 2.1.3, PM 2.1.4, PM 2.1.5. PM 2.1.6, PM 2.1.7, PM 2.1.8.** For **standing corps size** specifically, the reasoning justifying the increase presented under PO1 remains valid, with additional grounds found in the new visa-related tasks for Frontex. PO2 replaces PO1's **PM 2.1.1A** with **PM 2.1.1B,** which introduces a new standing corps category of 20 000 officers by 2041, serving as the EU's EIBM operational and emergency-response force. This category would enhance Frontex's capacity to assist Member States during emergencies and crises, while preserving the demand-driven approach and aligning with the shared-responsibility framework. The new category would have the following features:

- It would be tasked with promoting the consistent application of EU standards across the operational domains of EIBM, including returns. Accordingly, the new Category 5 would comprise staff from Member State national authorities that have completed a comprehensive Frontex training curriculum taken from the EBCG training strategy. Such **'top-up' training** would be complementary to national training systems and be focused on Frontex working methods and principles and objectives of EIBM.

- Category 5 officers would remain in their national administrations and become part of the pool of officers that Member States can nominate for Categories 2 and 3. At the same time, thanks to greater familiarity with Frontex and European border management, they would be able to easily

support joint operations in their host Member State.

- They would be available for deployment under exceptional and scenario-driven circumstances, functioning as a flexible pool rather than a permanently deployed component. The conditions for triggering deployment would have to be defined.

- To illustrate the contributions from Member States to the pool of trainable standing corps, an indicative Category 5 reference **quota** has been calculated by multiplying its Category 4 share of the EU total by the projected size of the Category 5 reserve by 2041 (see **Annex 10**).

- The introduction of Category 5 would require an expansion of the **financial support system** under Article 61, as adjusted under **PM2.1.4**. Another option is funding it through the Border Management and Visa funding instrument in the new Multiannual Financial Framework, creating a simplified, performance-based compensation system[65]. See also **Annex 10**.

In addition to more comprehensive Category 5, this option would also envisage additional policy measures to ensure reliable contributions from Member States for Categories 2 and 3, for instance, by making the Deployment Handbook compulsory for all the actors (**PM2.1.9**), adjusting the financing support mechanism to Category 5 (**PM2.1.10**) and developing an oversight and enforcement mechanism (**PM2.1.11**).

On the second thematic area (**employment conditions**), the following additional policy measures would be proposed: **PM2.1.12** to develop a system allowing to take into account the outcome of the compulsory training[66]; some implementing measures like **PM2.1.13** could also promote indefinite contracts by tying continued service to regular fitness assessments and enabling transitions to non-operational roles. Under **PD2.2** – **technical equipment and IT systems** a policy measure PM2.2.1 proposed under PO1 would be complemented by targeted legislative and operational measures. These would secure Frontex's equipment access and deployment capacity, while excluding large-asset ownership. In particular, **PM2.2.2** would reinforce Frontex capacities to act as a central purchasing coordinator for some categories of equipment, using the possibility of joint procurement. Along with that, under **PM2.2.3** a central logistics structure within Frontex would be created to coordinate deployment, maintenance, and servicing of owned equipment across borders. Under **PM2.2.4** participation in coordinated maritime presence (CMP) operations would be strengthened, enabling EU-level coordination of national assets without Frontex ownership. **PM2.2.5** would expand the scope of the technical equipment pool (TEP) to all operational needs (including enhanced maritime and aerial surveillance capabilities and advanced processing/analytical tools). Finally, on the execution side, **PM2.2.6** would lead to a stepped mechanism to address persistent non-compliance by Member States/SACs with agreed TEP availability commitments. To support implementation, Member States would gradually introduce EU-wide recognition mechanisms in areas where there are obstacles to deployment (e.g. firearm permits, vehicle roadworthiness tests), and compliance with TEP commitments would be reflected through an indicator linked to the future BMV funding framework (**PM2.2.7**).

#### 5.2.2.3 Policy measures relevant to Problem 3

For the different EIBM pillars identified under **Problem 3, PO2** largely builds on the measures proposed under PO1. These are measures intended to respond to training **(PD3.1**) and the thematic area of quality control (**PD3.2**). For **training**, specifically, policy measures from PO1 (**PM3.1.1 -**

[65] The methodology and means of the mechanism are still to be determined and depend on the final outlook of the funding instrument.

[66] For instance, based on measures included under Policy Option 1, a contract system could be developed matching Frontex's training system that caters for long-term career spans, where one-year contracts would be offered at a lower entry grade for officers having to undertake the mandatory training, renewed into a higher grade only for officers having successfully passed the training, subject to a new probation period based on the job performance and not a training.

**PM3.1.10**) would be complemented by the following: **PM3.1.11** prioritising scenario-based training for mid- and senior-level staff to ensure interoperable operational planning, command and coordination skills for staff, assuming command roles within standing corps deployments; **PM3.1.12** establishing a dedicated EU **top-up training** for standing corps Category 5, coordinated and funded by Frontex67. Delivering on **PM3.1.12** would need to be paired with non-legislative measures to increase internal capacity in the EBCG Academy (**PM3.1.13**) and a significant expansion of the trainer pool growth (**PM3.1.14**).

For the thematic area of **EIBM planning** (**PD3.2**), the non-legislative measures proposed under PO1 (**PM 3.2.1- PM3.2.6**) would be replaced by a combination of legislative and non-legislative measures to improve coherence, comparability and transparency across Member States. In particular, the voluntary coordination by the Member States would be replaced by governance instruments endorsed by the Management Board with a view to making EIBM planning more predictable and enforceable within existing structures. For instance, the Management Board would be obliged to adopt a formal multiannual EIBM planning calendar setting common timelines across key planning products, such as national strategies for EIBM, NCDPs, capability roadmaps, strategic risk analyses, and vulnerability assessments (**PM3.2.9**). This would be paired with obligations on Member States to comply with the updated NCDP methodology and to provide regular updates of planning inputs of hight quality (**PM3.2.10**). For more details on accompanying non-legislative measures (**PM3.2.11-PM3.2.12**) see **Annex 8**.

In the thematic area of **quality assurance** (**PD3.2**) the policy measures proposed under PO1 (**PM3.2.1** and **PM 3.2.2**) would be complemented by **PM3.2.13**, including EUROSUR data quality to vulnerability assessment and **PM3.2.14**, strengthening the enforcement of recommended measures in case of persistent vulnerabilities. Additionally, non-legislative measures would be proposed to use a vulnerability assessment escalation procedure within EIBM planning (**PM 3.2.15**) and to review resources, structures, and working methods Frontex's key oversight bodies and the Management Board to enhance quality assurance of Frontex activities as important part of the EIBM process **(PM 3.2.16)**.

### 5.2.3 Policy option 3: EBCG based on standing corps and central role of Frontex

**PO3** represents the most ambitious approach, implying the largest scope of modifications in the EBCG Regulation. **PO3** seeks to expand the EBCG's mandate and strengthen its capabilities where appropriate, to maximise Frontex's potential in border management, return and achieving EIBM objectives.

#### 5.2.3.1 Policy measures relevant to Problem 1.

Under this option, three scenarios have been identified for tackling the division of responsibilities within the EBCG (**PD1.1**) under **Problem 1** (this is not addressed under PO1 and 2). Under **Scenario A**, Member States retain primary responsibility for protecting their borders but may transfer additional responsibilities to Frontex under specific conditions and for limited periods. This scenario assumes enhanced Frontex capabilities, including expanded Category 1 staff and own technical resources. Under **Scenario B**, Frontex would assume greater leadership during serious deficiencies or critical border pressure (this is assessed using vulnerability assessments or Schengen evaluations). It would review and approve national capability development plans to ensure consistency with EU priorities. It would also be granted the right to initiate deployments when national action is delayed or inadequate. Member States would be obliged to align national operational planning and resource allocation with Frontex's strategic priorities, mandating personnel and technical assets contributions

[67] Its completion would be a prerequisite for registration as Category 5. The general programme would combine theoretical modules with practical, scenario-based exercises. The curriculum would complement national training systems by providing components that are difficult to deliver at the national level.

when necessary. Under **Scenario C** (an 'extreme' scenario), Frontex would assume primary responsibility for the EU's external borders, with a standing corps that would be increased to 30 000. Joint command and control structures would be established, placing Member State assets and personnel under Frontex command or shared command. The same measures as under PO1 would address the thematic areas related to i) **border controls** and ii) combating **cross-border crime** as part of **PD1.1**. By contrast, no measures would be proposed for the **emergency situations** thematic area. As regards the last thematic area under **PD1.1 (visa policy)**, the measures proposed under PO1 and 2 would be complemented by **PM1.1.13** (to establish an explicit competence for Frontex to provide regular training on detecting fraudulent documents and identifying visa fraud cases); **PM1.1.14** (to enable the temporary deployment of standing corps officers to support Member States' consular delegations in processing visa applications); and **PM1.1.15** (to deploy Frontex staff to third countries to carry out the pre-vetting of visa-required travellers before they start their journey to the Schengen area). EUROSUR (**PD1.2**) measures proposed under PO1 and 2 (**PM1.2.1-PM1.2.11**) would be complemented by measures to upgrade: EUROSUR into an omni-used border surveillance tool covering the entire EIBM – and particularly returns (**PM1.2.14**); the 'surveillance infrastructure at the Member State level' (including fixed and mobile systems, geo-location of patrols and assets) (**PM1.2.15**); and 'prevented entries' at external borders outside border crossing points as a new indicator for migratory pressure (**PM1.2.16**) – paired with development of Frontex in-house AI tools to analyse data from multiple sources (**PM1.2.17**). Furthermore, policy measures would be proposed to enable broader access to personal data for maritime, land, and air border situational awareness under clearly defined safeguards (**PM1.2.12**) and to enable personal data-processing in relation to social media monitoring as part of EUROSUR (**PM1.2.13**). As regards **PD 1.3 (the external dimension)**, measures proposed under PO1 (**PM1.3.1, PM1.3.2, PM1.3.3, PM1.3.3, PM1.3.4 and PM1.3.5**) and PO2 (**PM1.3.6 and PM1.3.7**) would be complemented by **PM1.3.8** to support or join existing bilateral arrangements between Member States and third countries – subject to Management Board approval safeguards [68].

As regards **PD1.4** (the thematic area on **returns**), measures proposed under PO1 and 2 would be complemented by the following measures. Policy measures would further centralise the EU return framework around Frontex as the central actor coordinating all EU return operations. There would not in principle be any opt-out possibility for the Member States to perform national return operations because this task would be supported by the 27/7 Return Support Desk (**PM1.4.14C**). This approach would also entail giving Frontex full access to the SIS (including creation of alerts) and establishing a SIRENE office at Frontex (**PM1.4.17C**). Policy measures would enhance Frontex's return activities in third countries, including by allowing Frontex to lead (finance, organise and coordinate) return operations in or from third countries under new status agreements that would allow the deployment of Frontex return teams, with clear conditions and safeguards in place (**PM1.4.16C**). The Frontex EU Reintegration Programme would become a fully-fledged EU reintegration service. Its offices would be staffed with reintegration case workers in third countries. A legal basis would be created for Frontex to take over responsibility for the digitalisation of return, readmission and reintegration (**PM1.4.5C**). As regards measures under **PD1.4** concerning **governance on return**, the policy measures under **PO2** would be complemented or partly replaced by rules on a dedicated system governance for returns (**PM1.4.19C**).

[68] These safeguards include Management Board approval to ensure alignment with Agency priorities and collective oversight; clear rules on immunities, privileges, and responsibilities for Frontex staff participating in operations under Member State-led arrangements; the presence of a trilateral arrangement or agreement; and clarifying the roles and rights of the Member State, Frontex and the third country.

#### 5.2.3.2 Policy measures relevant to Problem 2

As regards Frontex capabilities addressed under **Problem 2** (with regard to **standing corps architecture** and **employment conditions** as separate Thematic Areas), the same policy measures would be preserved as under PO2 (and PO1). Like PO2, this option would involve the introduction of Category 5 in order to better implement EIBM across the entire EBCG and to provide a uniformly trained and qualified, nationally based pool of officers that would be available for deployment in exceptional circumstances. This would complement the statutory expansion by ensuring access to additional trained personnel if operational pressure exceeds the capacity of Categories 1-3. All the characteristics of the new Category 5 described under PO2 would also apply under this option. The reasoning behind increasing the overall size of the standing corps as presented under PO1 and 2 would remain valid. The main difference would concern the size of the standing corps. Accordingly, under PM2.1.1C, Category 1 would be increased to at least 5 000 officers by 2041 (the target for the new Category 5 would therefore be 18 000), while the structure and size of Categories 2 and 3 would remain unchanged. The distribution of profiles within the expanded Category 1 would be determined through operational planning. An indicative breakdown is presented in **Annex 10**. This is based on projected workload and the specialised functions that are expected to arise from the mandate expansions. These calculations may not reflect the reality of Frontex's recruitment strategies, but they do illustrate the scale of reinforcement needed to meet anticipated operational and support demands. As regards **technical equipment and IT systems** (**PD2.2**), **PO3** would complement the measures under PO1 and 2 with the following policy measures. **PM2.2.7** would develop and operate EU-owned strategic technical capabilities for border surveillance (particularly maritime and aerial assets), including support functions (logistics, maintenance and training), paired with reinforcement of relevant resources within Frontex. **PM2.2.8** would further strengthen compliance with commitments made by Member States to the TEP (for example, with a stepped mechanism based on remedial measures, conditionalities linked to funding, and escalation possibility). **PM2.2.9** would prepare the way for the gradual introduction of EU-wide recognition mechanisms in areas that hinder Frontex's technical capabilities (e.g. firearm permits, vehicle roadworthiness tests and insurance). **PM2.2.10** would enable seamless cross-border deployment of Frontex-operated vessels and aircraft (for example, adoption of an EU mission flag or pennant – on the basis of a multilateral arrangement for mutual recognition in cooperation with EASA and EMSA). Under **PM2.2.11**, Frontex would become a central purchasing coordinator. Unlike PO2, the feasibility of joint procurement would be explored for large seaborne and airborne assets, with categories determined in cooperation with Member States / SACs.

#### 5.2.3.3 Policy measures relevant to Problem 3

As regards the different pillars of EIBM identified under Problem 3 and as regards **training** structure, **PO3** combines measures proposed under PO1 (**PM3.1.1-PM3.1.10**) as well as measures proposed under PO2 (**PM3.1.11-PM3.1.14**) with regard to top-up training for Category 5. In addition, **PO3** introduces the following non-legislative measures. **PM3.1.15** would scale up the training of Category 1 to meet the needs of the expanded standing corps and the broader mandate. This would include adapting the operational training programme, reinforcing the central training capacity and further expanding decentralised training deliveries in Member States. For the thematic area related to **EIBM planning**, **PO3 would build on** the measures under PO1 and 2 (**PM3.2.1-PM3.2.6 and PM3.2.9-PM3.2.12) and introduce the following additional legislative measures**. **PM3.2.17** would mandate Member States to adopt national EIBM strategies that are aligned with the multiannual EIBM strategic policy within set timelines and to transmit them to Frontex and the Commission. **PM3.2.18** would

require NCDPs to be updated at least every three years (or whenever there is any material change) and for them to be transmitted within one month. **PM3.2.19** would amend the rules applicable to joint procurements with specific obligations as regards cooperation between Frontex and Member States in follow-up actions. **PM3.2.20** would raise the planning brief from an analytical support tool to a core component of a capability cycle supervised by the Management Board. It would do so by obliging the Management Board to formally approve the Capability Roadmap every year and to create an annual oversight mechanism to ensure the coherent translation of risk analysis and vulnerability assessment outputs into capability development and deployment decisions. No new measures (compared with PO2) would be proposed as regards quality control.

## 6. WHAT ARE THE IMPACTS OF THE DIFFERENT POLICY OPTIONS AND WHO WILL BE AFFECTED?

This section summarises the main expected impacts (economic, social, environmental and on fundamental rights) of measures that are considered under different policy options (POs) in response to different problems, problem drivers (PDs) and thematic areas (TAs) in order to make it easier to identify the issues that are most relevant for the affected stakeholders. The assessment relies on the evidence collected throughout the Impact Assessment study – including on (as far as possible) the quantification and monetisation of the impacts considered. The impacts are as far as possible quantified on the basis of available assessments or modelling. Where dedicated modelling/monetisation was not possible due to a lack of data, a qualitative assessment was performed to ensure transparency on the full range of potential effects. **Annexes 3 and 4** provide further details on the methodological approach, detailed tables and estimates. The impacts are assessed in relation to the baseline, on a scale ranging from -3 (significant negative impact) to 3 (significant positive impact). This Section is complemented by **Annex 11** (cost assessment).

### 6.1. Economic impacts

The economic impacts primarily relate to the costs of adopting the legislative measures. The following **stakeholder groups** are expected to be affected by the proposed measures: the Member States; the national authorities responsible for border management, returns and coast guard functions (and, to some extent, police and other law enforcement authorities); Frontex itself and other relevant EU agencies (particularly Europol and EU-LISA); industry stakeholders (particularly manufacturers and service providers of border surveillance and control capabilities); EU citizens; and third-country nationals (particularly migrants, asylum seekers and persons who have exhausted their legal rights to remain in the EU). The proposed measures would entail significant costs for **Frontex's budget** and would also, to some extent, generate **regulatory costs for Member States** (e.g. EUROSUR). Moreover, the digitalisation of return case management systems is expected to generate efficiency gains and cost savings for Member States and relevant national authorities over time. It would do so by reducing manual processes, streamlining information exchange and enabling a more efficient use of resources. The proposed measures might also generate direct and indirect benefits (including improved operational efficiency and effectiveness in border management); improvements in combating cross-border crime and smuggling, and by addressing risks related to the issuing of visa and verification of documents; more comprehensive situational awareness (which may lead to swifter decision-making and resources); enhanced cooperation in the external dimension; and enhanced return activities (see **Annex 3**).

However, where it is possible to quantify costs linked to Frontex's budget (in line with the available data), it is also important to take due account of any limitations on quantifying the economic impacts on other stakeholders (e.g. industry).

*Figure 1. Overview of estimated costs to Frontex's budget (EUR million), by policy option and thematic area, and including both existing costs and impact of policy measures*

| Thematic area | Policy option 1 | | Policy option 2 | | Policy option 3 | | Preferred policy option | |
|---|---|---|---|---|---|---|---|---|
| | 2028-2034 | 2035-2041 | 2028-2034 | 2035-2041 | 2028-2034 | 2035-2041 | 2028-2034 | 2035-2041 |
| **Returns** | 1 337 | 1 910 | 1 143 | 1 668 | 1 168 | 1 592 | 1 143 | 1 668 |
| **Standing corps size and composition** | 9 117 | 16 352 | 6 547 | 7 093 | 6 632 | 8 371 | 6 632 | 8 371 |
| **Technical equipment** | 1 831 | 2 478 | 1 704 | 1 956 | 1 918 | 2 535 | 1 704 | 1 956 |
| **Other *** | 868 | 900 | 954 | 985 | 954 | 985 | 954 | 985 |
| **Total (not adjusted for inflation)** | **13 153** | **21 640** | **10 348** | **11 702** | **10 672** | **13 483** | **10 433** | **12 980** |

*** Linked to measures that reduce costs to and existing/unchanged budget lines.**

**Industry impacts** are mainly driven by measures under **PD2.2** on technical equipment and IT systems. Under PO2 and 3, reinforcing Frontex's role in joint procurement / central purchasing (**PM2.2.2 and PM2.2.12**) and expanding the TEP (**PM2.2.5**) would be expected to increase the scale and predictability of procurement for certain equipment categories and associated services (including maintenance and logistics) – while also potentially reducing transaction costs through the aggregation and standardisation of requirements. In the aerial surveillance area, the choice between continued leasing and potential future ownership models has direct implications for the market structure and for suppliers' investment incentives. Frontex's own modelling illustrates the different cost and expenditure profiles over time.

Figure 4 below provides a general overview of the economic impacts, taking into account different stakeholders and areas of concern (as described above). A negative number represents a negative economic impact (i.e. it is a cost for the budget). A positive number represents a positive economic impact (i.e. it is a saving for the budget).

*Figure 4. Overview of **economic** impacts across thematic areas and policy options 1-3*

| Problem/Driver | Thematic area | PO1 | PO2 | PO3 |
|---|---|---|---|---|
| **PD1.1** | **Border controls** | **-1** | **-1** | **-1** |
| **PD1.1** | **Countering cross-border crime** | **0** | **0** | **0** |
| **PD1.1** | **Emergencies and hybrid threats** | **N/A** | **0** | **N/A** |
| **PD1.1** | **Visa policy** | **N/A** | **0** | **-1** |
| | | | | |
| **PD1.2** | **EUROSUR** | **-1** | **-2** | **-3** |
| | | | | |
| **PD1.3** | **Cooperation with third countries and CSDP missions** | **0** | **-1** | **-2** |
| **PD1.3** | **Cooperation with international organisations** | **-1** | **-1** | **-1** |
| | | | | |
| **PD1.4** | **Returns** | **-2** | **-2** | **-3** |
| | | | | |
| **PD2.1** | **Standing corps architecture** | **-3** | **-1** | **-2** |
| **PD2.1** | **Employment conditions for the standing corps** | **2** | **1** | **1** |
| **PD2.2** | **Technical equipment and IT systems** | **0** | **-1** | **-3** |
| | | | | |

| Problem/Driver | Thematic area | PO1 | PO2 | PO3 |
|---|---|---|---|---|
| PD3.1 | Standing corps training | -1 | -2 | -2 |
| PD3.2 | EIBM management strategic and integrated planning | 1 | 1 | 1 |
| PD3.2 | Quality assurance mechanisms | 1 | 1 | 1 |

### 6.1.1 Thematic areas with relatively insignificant economic impacts

This section includes areas where the policy options are either not expected to involve any noticeable and quantifiable costs or savings or are expected to have minimal cost or saving implications (often due to minor adjustments in Frontex's current scope of activities).

**Impacts of policy measures responding to PD1.1 (Frontex's mandate).** Across the policy options, the legislative measures concerning improvements in **border control** in terms of legislative clarity (**PM1.1.1, PM1.1.2 and PM1.1.3)** as well as the definition of deployments and chain of command **(PM1.1.4**) would entail some limited costs but deliver substantial operational gains. Some Member States may have to carry out significant IT and infrastructure upgrades using Frontex and EU funds support, but these would be one-off investments that would be offset by long-term efficiency gains. Neither the legislative clarifications concerning the **exercise of executive powers (PM1.1.7 and PM1.1.8)** nor the rules on **data sharing with Europol (PM1.1.9)** would have a direct economic impact. Some savings are possible due to more efficient use of available resources if standing corps officers perform executive powers more autonomously. The increase in the number of the standing corps officers involved in Europol-coordinated joint action days (JADs) and EMPACT operational actions could also lead to security gains that could have economic value [69]. In 2024, with roughly 65 standing corps Category 1 specialists focusing on cross-border crime and vehicle crime [70], Frontex played an important role in these exercises [71]. The hypothetical increase of these specialists to around 150 (more than doubling current capacity) would probably expand potential participation in JADs and EMPACT actions, both quantitatively and geographically. It would also increase Frontex's ability to assist Member States in pre-operational planning and post-operational follow-up – thus deepening not only its presence but also its qualitative contribution [72]. As regards **visa policy**, only PO3 (with exceptional deployments in third countries (**PM1.1.16**)) could entail more significant extra costs – due to the difference between a 'typical' deployment and this specific deployment mission in consulates in third countries. However, the overall impact would be minimal due to the exceptional and short-term nature of such deployments. Clarifications of Frontex's role in **emergency situations and hybrid threats** at the EU's external borders (**PM1.1.11 and PM1.1.12**) do not have an economic impact in themselves.

**Impacts of policy measures responding to PD1.3 (external dimension).** Only PO2 and 3 could entail limited extra costs. These would be due to Frontex's increased engagement in more third countries and related EU-funded projects in border management, because this would require extra appropriate human and administrative resources to execute the projects. PO3 (with **PM1.3.8** as well as policy measures under other options) would have a moderate economic impact because Frontex

[69] These actions had sizeable outputs. 503 stolen vehicles, 740 firearms, large quantities of drugs (e.g. about 49 tonnes of cocaine), almost 99 million cigarettes, as well as 1 374 identified victims (including 153 children) and 401 migrant smugglers were detected.
[70] Frontex (2025) Consolidated Annual Activities Report 2024, p. 36.
[71] Frontex led or co-led 7 of the 9 JADs implemented across the EU. It also participated in 101 operational actions (9 times as the action leader, 22 times as a co-leader and 70 times as a participant).
[72] The study accompanying the Impact Assessment (using 2024 results as a baseline) indicates that this would, for example, mean the following: annual detections of stolen vehicles rising from 503 to 650-800; seizures of illicit drugs (e.g. cocaine) rising from about 49 tonnes to roughly 64-79 tonnes of cocaine; seizures of illicit firearms rising from 740 to about 950-1 200; and identified victims of trafficking and smuggling rising from 1 374 to around 1 800-2 200 (with a similar proportional rise in identified smugglers – from 401 to roughly 520-640).

would operationalise activities in third countries by supporting or joining the bilateral arrangements of Member States. This could increase administrative, human resource and financial burdens (due, for example, to increased equipment or financing needs). PO1 (with **PM1.3.1-1.3.5**) would not entail additional costs because it focuses on modifying existing practices and removing legislative limitations and because it would only moderately increase the number of Frontex's activities in the future. For **cooperation with international organisations**, the additional cost of PO1 (**PM1.3.6A**) and PO2 (**PM1.3.6.B**) would be limited, because the administrative burden and human resources would be spread over a longer period that would be necessary in order to negotiate underlying working arrangements and because the number of international organisations that are relevant to Frontex's mandate is limited.

**Impacts of policy measures responding to PD3.2 (planning and quality assurance).** Measures proposed **across all policy options** are expected to entail only limited additional costs, because they are largely based on the existing tools and communication platforms [73], even if Frontex and the Member States would be required to carry out some additional administrative tasks in order to introduce the template and ensure the coordination of planning cycles or strategic planning calendar by synchronising all major planning and reporting requirements across the EBCG [74]. The benefits of the proposed measures across the policy options (better coordination, transparency and preparedness) would counterbalance costs [75]. Likewise, measures proposed as regards vulnerability assessment – expanding its scope (**PM3.2.7, PM3.2.8 and PM3.2.13**) and the enforceability of recommended measures (**PM3.2.14**) – would have a minimal but positive economic impact, because they would enhance information flows without imposing new operational requirements. The capacities of key **internal oversight bodies** (i.e. DPO, FRO, IAC and ICO) under **PM3.2.16** would require minimal additional resources, because the measures could entail an increase in administrative and staffing costs, recruitment of staff and investment in training – but without establishing new structures.

### 6.1.2 Thematic areas with potentially more significant economic impacts

**Impacts of policy measures responding to PD1.4 (returns).** The economic impacts would relate to the projected costs of return activities, as well as to costs and savings linked to specific policy measures. They include the costs of return-related equipment (e.g. charter flights) but do not include the costs of deploying standing corps officers as part of return operations, because these are regarded as part of the standing corps architecture and are linked to the growth of the standing corps. The baseline costs are derived from the 2024 return costs – assuming an 8% annual growth rate until 2034 and a moderated 2% growth rate thereafter to reflect uncertainty about long-term trends. In line with historical data and expert opinions, the number of Frontex-supported returnees is assumed to be 60 000 annually (scaling with the cost growth rate). Expansion of Frontex's coordination role in returns (**PO2** and **PO3**) results in additional governance costs that are estimated at 2.5% of baseline costs for PO2 and 5% for PO3. Expanding Frontex's role may increase costs due to a potential increase in the number of returnees processed – compared with the baseline scenario. However, the full extent of these costs cannot be quantified at this stage. Conversely, this expansion would also generate cost savings due to the increased efficiency of Frontex-managed returns. These savings may arise from operational efficiencies on charters, reduced instances of booking or aborting of scheduled forced returns, fewer empty charter seats and a shift towards voluntary returns. Savings are based on the cost differential between voluntary returns (EUR 560) and forced returns (EUR 3 414 or EUR 6 000, depending on the

[73] For instance, the methodology for national capability development plans (NCDPs) is reflected in the template approved by the Management Board (Decision 28/2024).

[74] Frontex already provides methodological and IT support (for example, via communication channels used for vulnerability assessments).

[75] For example, development of scenario-based planning would make planning more practical and crisis-ready by applying risk analysis and intelligence in concrete scenarios. This would improve preparedness and enhance the resilience of national systems. Costs would be limited to using the staff time of Frontex experts.

return case). Returns measures under **PO1** are expected to require some investment but also to generate efficiency gains (e.g. lower per-case costs over time). In particular, improving operational coordination is expected to generate some efficiency gains (by, for example, strengthening Frontex's role in planning and coordinating returns through **PM1.4.1A**) that could potentially lower the operational costs for return-related activities over time compared with the baseline – while also allowing Frontex to play a greater role in returns and, overall, increasing the volume of return-related activities. Additional economic impacts would be generated by increased administrative, HR and IT development/expansion costs linked to the introduction of shared platforms or the creation of an EU platform for identification data; as well as to Frontex's responsibilities concerning the proposal to digitalise case management in the areas of return, readmission and reintegration (including consolidating and enhancing the interoperability of several digital tools managing cases in these areas) (**PM1.4.8, PM1.4.9 and PM1.4.10**). Focusing and strengthening the EURP and leveraging increased capacity-building activities in third countries may also have moderate additional budgetary impacts for Frontex (**PM1.4.7**) as well as increase the resources necessary for the monitoring system (**PM1.4.3**) and the expanded vulnerability assessment (**PM1.4.4**). However, these costs will not be addressed here because they are directly linked to the proposal for a regulation on digitalisation of case management in the area of return, readmission and reintegration [76]. The overall amount envisaged for returns under **PO1** is estimated at around EUR 1.3 billion in the first MFF period and EUR 1.9 billion in the second MFF period. **PO2** significantly alters Frontex's role and generates significant costs by making Frontex the default return operator (**PM1.4.14B**) and expanding third-country return activities (**PM1.4.16B**) – thereby significantly increasing the number of activities and return operations (in terms of both absolute numbers and the share of all activities supported by Frontex). However, it was not possible to capture the full extent of these costs, because the number of returnees processed by Frontex may be greater than expected. The development of in-house identification capacities at Frontex will have a significant economic impact due to the need for additional HR, IT and technical resources. Improving return coordination is expected to generate total savings of EUR 194 million for 2028-2034 and EUR 242 million for 2035-2041. These will be achieved by reducing charter costs through better seat-fill and pooling; by reducing the number of cancelled forced-return bookings; and from the positive financial effects deriving from favouring voluntary returns over forced ones (**PM1.4.1B**). Some costs can be expected to be generated by Frontex's assumption of responsibility for reintegration efforts of the EU and taking on a role in the digitalisation of return, readmission and reintegration (**PM1.4.5B**); the introduction of Frontex return liaison officers (**PM1.4.13B**); and support on standardised return and reintegration counselling (**PM1.4.18**). The overall EU return figures (including the share of Frontex-supported returns among all returns effected by Member States) are expected to increase due to Frontex's enhanced coordination role and assistance efforts. Efficiencies may also be generated because there will now be a permanent, professionalised workforce (such efficiencies may include smoother planning of return escorts, more predictable deployment cycles and potentially lower per-case costs over time), but these gains are unlikely to outweigh the substantial investment required. Considering both costs and savings, the overall costs envisaged under **PO2** (taking into account this limitation) are estimated at around EUR 1.14 billion in the first MFF and nearly EUR 1.67 billion in the second MFF. **PO3** would centralise all EU returns under Frontex and involve the permanent deployment of return specialists and escorts (**PM1.4.14C**). Additionally, enhanced cooperation with third countries (including the deployment of return specialists in third countries would be envisaged) (**PM1.4.16C**), together with the refocusing and strengthening of the EURP (**PM1.4.7**). Technical equipment costs also rise markedly – reflecting the additional IT systems, operational equipment and infrastructure required to support a larger and more active operational workforce. Overall, estimated

[76] The estimated cost entailed by expanding Frontex's role on digital matters ranges between EUR 115 million and EUR 147 million (assuming two years of one-off development and six years of ongoing maintenance and support). For more details, please refer to the impact assessment accompanying the Commission proposal to digitalise case management in the area of return, readmission and reintegration.

costs would be EUR 1.17 billion in the first MFF and EUR 1.6 billion in the second MFF (assuming the same limitations as those under PO2**)**. The expected cost savings would amount to EUR 170 million for 2028-2034 and EUR 318 million for 2035-2041. They would be achieved by centralising EU return operations under Frontex, thus allowing the EU to leverage economies of scale (for example, via joint procurement of service providers). Centralised planning and pooling may generate operational efficiencies (e.g. improved aircraft fill rates, greater consistency in the use of return escorts and logistical resources, and reduced costs associated with separate national contracts with external partners). Larger volumes could also drive down per-beneficiary costs and improve negotiating power with implementing partners. However, the initial transition would entail considerable set-up costs that would probably not be offset over time. The overall necessary budget is expected to increase due to the need to increase the assistance provided by Frontex in all phases of the return procedure.

The measures proposed across policy options in the area of **governance** for returns reflect the development of Frontex's tasks and the standing corps role. They build on existing structures and processes and would not generate additional costs. They would at most require only minimal administrative adjustments (for example, in the secretariat of the Management Board) that Frontex's budget would have to cover.

**Impacts of policy measures responding to PD2.1 (standing corps).** The increase in size to 30 000 in the formula proposed under all policy options will have very different economic impacts, depending on the composition of the different categories. The economic impact considered in relation to the standing corps architecture includes staffing costs for Category 1 (including operational expenditure); deployment costs for all categories (taking into account the potential savings linked to a new deployment system defined under **PM2.1.8**); and the financial support provided to Member States under Article 61. These are the largest cost drivers in all the options. **PO1** envisages significantly higher costs in both MFFs (tripling by 2041) due to the gradual expansion of all categories. In this scenario, the staffing costs for Category 1 alone (reaching 9 000 officers by 2041) would account for EUR 3.5 billion in the first MFF and nearly EUR 6.5 billion in the second MFF. Deployment costs based on the revised deployment system (considered at 100% capacity across all categories) would also be very significant, reaching EUR 1.9 billion and EUR 3.6 billion in the first and second MFFs respectively. Costs linked to the financial support under Article 61 would amount to EUR 2.5 billion and EUR 4.7 billion in the first and second MFFs respectively. **PO2's** standing corps architecture maintains the current categories in line with the 2027 targets but also introduces a new Category 5 (20 000 officers) that would entail significant costs for Frontex (albeit to a much more moderate extent). Staffing costs for Category 1 would amount to nearly EUR 2.6 billion in both MFFs. Deployments and financial support under Article 61 for all existing categories would amount to EUR 1.5 billion and EUR 1.3 billion in the first and second MFFs respectively. The new Category 5 deployment costs would have a very moderate impact – given the exceptional nature of their deployments – and are estimated at approximately EUR 25 million in each MFF. The costs linked to the financial support under Article 61 for new Category 5 would be more significant. These are calculated using the Category 3 methodology and estimated at EUR 295 million. **PO3** combines the growth in Category 1 staff (assumed to be 5 000 officers by 2041) with the introduction of the new Category 5 (18 000 by 2041). Staffing costs would be significantly lower than under **PO1** under this policy option but would still be greater than under **PO2 –** particularly in the second MFF (EUR 2.9 billion and EUR 3.8 billion in the first and second MFFs respectively). Deployment costs for Category 1 in **PO3** would also be higher than under **PO2** and the difference would increase in the second MFF (approximately EUR 114 million). The costs for Categories 2 and 3 in **PO3** would remain the same as under **PO2**, but Category 5 costs linked to the financial support under Article 61 would be lower (EUR 73 million and EUR 265 million in the first and second MFFs respectively).

Other measures linked to the standing corps architecture across all policy options (**PM2.1.2, 2.1.3, 2.1.4 and 2.1.5**) are not expected to generate additional economic impacts. However, some measures linked with the **employment conditions of the standing corps** would generate costs and savings. These are significantly affected by the underlying number of standing corps Category 1. **PM2.1.8** proposes a change to the current mission system (establishing the place of deployment as the place of employment in most cases). Deployments to third countries remain estimated under the generally applicable mission framework. For example, by comparison with the costs generated by the current mission system in PO3, this approach would result in average annual savings of EUR 131.8 million for PO3 in MFF1 and EUR 170 million in MFF2 (taking into account deployment costs for Category 1 and Category 2 standing corps officers). These savings are calculated on the basis of deployment costs alone and not on the basis of the impact on salaries and staffing costs. Additionally, the current allowances linked to work patterns applicable to Category 1 officers would be extended, generating additional costs that would be covered by staffing costs.

**Impacts of policy measures responding to PD3.1 (training).** The impacts of standing corps training measures concern costs related to the increase in Frontex's training capacity, which is itself directly linked to the growth of the standing corps. The costs are primarily driven by the expansion of the EIBM top-up training for Category 5 (**PO2** and **PO3**), alongside basic and specialisation training for all categories. The calculation of the specialisation training costs is based on the number of deployable standing corps officers. The overall training costs are based on the assumption that a training centre would be established in Warsaw for Category 1 basic training and Category 5 top-up training (under **PO2** and **PO3**). Overall, the costs are estimated at nearly EUR 43 million (MFF 1) and EUR 74 million (MFF2) under **PO1**; EUR 98 million (MFF1) and EUR 193 million (MFF2) under **PO2**; and EUR 97 million (MFF1) and EUR 180 million (MFF2) under **PO3**. The cost estimates for the standing corps are subject to **two key limitations and uncertainties** (these are detailed in Annex 11). First, the overall figures rely on generic assumptions (detailed costs and human resource requirements would be definitively determined at later stages of implementation). The unit costs used as a basis for calculating **deployment costs** are based on expenditure data from 2024 (a year without major crises). The estimates may therefore understate the financial implications of large-scale or crisis-driven deployments (e.g. sudden migration pressures or hybrid threats). Second, **training centre costs** assume a scaled-up rental model based on Frontex's initial estimate for 600 officers. This approach takes increased capacity needs into account but not the potential purchase of a dedicated building (this could entail higher upfront costs but reduce expenses in the longer term).

**Impacts of policy measures responding to PD2.2. Technical equipment** is one of the main cost drivers, covering impacts linked to Frontex's technical capabilities (particularly the technical equipment pool (TEP); state-of-the-art situational awareness tools; and mobile and portable equipment for the standing corps deployments). Under **PO3**, it also covers the potential shift from the current service-based and Member-State-pooled model towards EU-owned strategic aerial and maritime surveillance assets. Under **PO1** and **PO2**, Frontex continues to lease or rent aerial surveillance services under framework contracts. There are no plans to increase the scope of aerial surveillance activities. Maritime surveillance assets remain primarily pooled from Member States. It should be noted that all policy options entail Frontex providing personal, portable and mobile equipment for standing corps Categories 1 and 2 – while Category 3 deploys with Member State-owned equipment and uniforms. Moreover, it is assumed that Member State contributions to the TEP will remain at current levels, given uncertainty around future co-financing under specific actions. Under **PO1**, no material change is expected for technical equipment (beyond legal clarity on ETIAS/FADO tasks under **PM2.2.1**), so budgetary impacts remain limited. Under **PO2**, measures to improve access to and availability of technical equipment include reinforcing Frontex's role as central purchasing coordinator via joint procurement (**PM2.2.2**); establishing a central logistics and fleet-management structure (**PM2.2.3**);

strengthening participation in Coordinated Maritime Presence (**PM2.2.4**); expanding the TEP (**PM2.2.5**); and introducing a stepped mechanism to address persistent non-compliance with agreed TEP-availability commitments (**PM2.2.6**). These measures are not expected to materially change the overall expenditure envelope for technical equipment in the quantified cost assessment, which remains aligned with **PO1**. The overall costs for technical equipment under **PO1** are therefore estimated at nearly EUR 1.83 billion (in the first MFF) and EUR 2.47 billion (in the second MFF). The overall costs for technical equipment under **PO2** are estimated at nearly EUR 1.7 billion (2028-2034) and EUR 1.95 billion (2035-2041). Other technical equipment (e.g. vehicles, mobile surveillance systems, PPE/uniforms and portable detection equipment) is costed on the basis of historical framework contract values (scaled in proportion to Category 1 and 2 deployments). For reference, in 2024, this corresponded to approximately EUR 5 000-6 000 per deployed Category 1 and 2 officer. Under **PO3**, Frontex would shift from a service-based, Member State-pooled model towards EU-owned strategic technical capabilities for border surveillance assets (**PM2.2.7**). This would entail significant costs – particularly when Frontex progressively shifts from predominantly renting and contracting out services towards owning assets (particularly in aerial and maritime surveillance); and develops the associated maintenance/logistics capacity (e.g. insurance, contracted support, specialist crew, operational bases, hangars and docking/ shipyard arrangements). These dynamics are reflected in the cost assessment (**Annex 11**), including modelling of 'rent' versus 'own' scenarios for key capabilities. The 'own' scenario assumes a progressive replacement of Member-State-pooled assets by 2041. Alternative mixes (for example, limiting Frontex ownership to coastal patrol boats and vessels while co-financing or chartering offshore patrol vessels) would materially alter the capital / operating expenditure profile and infrastructure needs. The overall costs for technical equipment under **PO3** are estimated at nearly EUR 1.92 billion (2028-2034) and EUR 2.53 billion (2035-2041). Additionally, some moderate costs are expected to arise from expanding and modernising the TEP under both policy options (estimated at around EUR 10 million per year in MFF1 and EUR 15 million per year in the MFF2 period). Overall, the measures proposed under **PO3** are expected to have the highest cost impact. They go beyond clarifications and incremental improvements and instead address the main 3% of Category 1: (i) higher and more predictable availability of deployable operational capacity (standing corps build-up and deployment system (**PM2.1.1**); (ii) improved availability of technical equipment (including strategic capabilities and stronger compliance with TEP commitments) (**PM2.2.7-PM2.2.8,** building also on **PM2.2.5-PM2.2.6**); (iii) stronger interoperability and integrated planning across Member States and Frontex (removing operational bottlenecks to deploy and operate assets across borders and harmonising key enablers (**PM2.2.9-PM2.2.10**); a reinforced EIBM planning cycle and capability-planning supervised by the Management Board (**PM3.2.7-PM3.2.14**) plus interoperable command / training elements where relevant; and (iv) a more sustainable capability model for key functions (moving from ad hoc short-term arrangements towards a structured capability model for aerial and maritime surveillance with appropriate support functions and coordinated procurement/logistics)(**PM2.2.7** and **PM2.2.11**, building also on **PM2.2.3**). **PO3** would deliver more far-reaching capability autonomy (particularly through an 'own' model for strategic aerial/maritime assets) but would also involve higher budgetary costs. The preferred approach for technical equipment therefore remains **PO2**, because it strengthens access, availability, deployability and compliance – within a broadly stable expenditure envelope and with lower implementation risk.

**Impacts of policy measures responding to PD1.2 (EUROSUR).** The implementation of measures to improve and expand **EUROSUR** will entail significant costs because the Member States will need to invest in technological solutions and additional human resources. Under **PO1**, most expenses are generated by the extension of the scope of data to be collected in EUROSUR covering internal security, including hybrid threats and the provision of the forward-looking situational picture (**PM1.2.6** and **PM1.2.1)**. Moderate costs are linked to the inclusion of EUROSUR data quality in the vulnerability assessment processes provided under **PO1** and **PO2** (**PM1.2.11** and **PM3.2.3**) because Member States would need to provide more data than are currently required under the existing legislative framework

(this would in turn require additional staff). However, the costs under **PO1** and **PO2** would be mitigated by positive operational gains (i.e. enhanced reliability of situational awareness at the regional and EU levels; and more concrete, timely and accurate data that will enable better planning, tasking and decision-making in border surveillance and related operations). The most resource-intensive and technologically ambitious set of changes is proposed under **PO3**: both the inclusion in EUROSUR of new categories of data (e.g. the return-related information or new indicators on prevented entries) (**PM1.2.16**) and enabling Frontex to directly access the outputs from the national surveillance assets (**PM1.2.15**) would require not only significant human resources from Member States and Frontex but also require adjustments to the existing IT solutions. The development of an in-house AI tool by Frontex (**PM1.2.17**) – a technological novelty in itself – would absorb a significant part of Frontex's budget. This assessment focuses solely on the ICT-related costs of expanding EUROSUR as an information exchange and operational cooperation framework. It excludes the costs of state-of-the-art surveillance tools, which are addressed separately under technical equipment (**PD2.2**). Furthermore, the costs can only be assessed once the scope of the changes (particularly in **PO3**) has been well defined. These costs will depend on several factors. One key factor would be Frontex's practical choice between using the existing infrastructure to roll out new EUROSUR features and developing entirely new IT solutions. Another factor would be the availability of IT specialists and their contracts (Frontex own staff or external contractors), hardware licences and their quantities. Other factors include the scope of one-off costs and recurrent ones; the level of Member States' IT progress in implementing the existing EUROSUR; the extent of changes to the business architecture; and market uncertainties and risks. The uncertainty surrounding the final scope of modifications means that accurate cost estimates cannot yet be provided.

### 6.2. Social impacts

*Figure 5. Overview of social impacts across policy options (PO) of policy measures (PM) responding to problem driver (PD) / thematic area (TA)*

| Problem driver | Thematic area | PO1 | PO2 | PO3 |
|---|---|---|---|---|
| PD1.1 | Border controls | 3 | 3 | 2 |
| PD1.1 | Countering cross-border crime | 1 | N/A | N/A |
| PD1.1 | Emergencies and hybrid threats | N/A | 2 | N/A |
| PD1.1 | Visa policy | N/A | 2 | 2 |
| PD1.2 | EUROSUR | 2 | 2 | 1 |
| PD1.3 | Cooperation with third countries and CSDP missions | 2 | 2 | 3 |
| PD1.3 | Cooperation with international organisations | 2 | 2 | 2 |
| PD1.4 | Returns including governance | 2 | 2 | 2 |
| PD2.1 | Standing corps architecture | 2 | 3 | 3 |
| PD2.1 | Employment conditions for the standing corps | 2 | 2 | 1 |
| PD2.2 | Technical equipment and IT systems | 1 | 1 | 1 |
| PD3.1 | Standing corps training | 3 | 3 | 3 |
| PD3.2 | EIBM management strategic and integrated planning | 1 | 2 | 1 |
| PD3.2 | Quality control mechanisms | 1 | 2 | 2 |

This initiative is expected to affect **the same stakeholder groups as economic impacts**.

**Impacts of policy measures responding to PD1.1**. Across all policy options, the policy measures for thematic areas related to **border control and combating cross-border crime** are expected to have a range of **positive operational impacts** on all stakeholders concerned. Measures such as recognising the executive powers of the standing corps (**PM1.1.1**) or granting Frontex first-line access (**PM1.1.3**) are intended to increase the efficiency and effectiveness of deployments – by improving deployment

readiness, the interoperability of officers and clarity in roles and responsibilities. **PM1.1.4** (related to Frontex's operational concept) and **PM1.1.5** (on funding for Member States' hosting capacity) are intended to, respectively, establish Frontex's operational structures in legislation and assist the Member States in establishing the infrastructure needed to host joint deployments. Officers would be more interoperable with counterparts from other national authorities and Frontex – thus improving working conditions and the subdivision of tasks and responsibilities. These changes would give national authorities clear operational counterparts – thus improving joint deployment effectiveness, promoting mutual trust and reducing the operational burdens currently associated with Frontex deployments. This would in turn have the benefit of normalising joint operations as a flexible tool to achieve operational objectives. There would also be positive **institutional impacts** linked to efficiency gains because resources that are currently tied to escorting Frontex staff would be freed up. Granting the standing corps access to relevant databases in first-line border checks would allow them to contribute to border checks more comprehensively. Taken together, these measures would have a **positive social and economic impact** on travellers and cross-border trade by making it possible to reduce the time spent in queues at borders (particularly at land borders). They would also – together with the revision of rules applicable to the processing of operational personal data – make the handling of illegal crossings more effective, reduce cross-border crime and promote safer communities (particularly those near the EU's external border). Overall, the EU's external border would be better managed and safer, with greater trust between competent authorities and citizens in the EU and confidence in the value that the EU (including Frontex) can add to the management of borders and migration. The scenarios considered under **PO3** (reinforcing the autonomy of Frontex or shifting the entire responsibility for border management and return to Frontex) would increase Frontex's exposure – across all three scenarios. Expanding Frontex's capacities is expected to be a lengthy process that will last until 2041. This imbalance could in some circumstances (e.g. increased migratory pressure as well as incidents at the borders or at the sea) undermine trust in Frontex, thus diminishing the overall positive social impacts of measures proposed under this thematic area.

Only **PO2** contains measures for the **emergencies and hybrid threats** thematic area. These measures would positively impact social outcomes by enabling coordinated EU responses to emergencies and hybrid threats, and by improving interoperability with national efforts. They would thus strengthen the EU's overall resilience and responsiveness. As regards the **visa policy** thematic area, all the measures under **PO2** and **PO3** would have a positive impact on operations, but each option's score would be driven by different underlying factors but for different underlying reasons. Measures under PO2 would enable consular staff to better anticipate risks, standardise practices to combat visa shopping and fraud trends, and disrupt fraud networks at an early stage [77]. Additional measures under PO3 would have a neutral score due to the need for more extensive legal modification and necessary resources – thus maintaining the score for the measures proposed under PO2 (and PO3).

**Impacts of policy measures responding to PD1.2.** The policy measures considered for **EUROSUR** under **PO1** and **PO2** would have various positive **operational impacts** (particularly for NCC, national authorities and Frontex). Measures proposed under **PO1 (PM1.2.1-PM1.2.8)** would improve the operation of EUROSUR by boosting situational awareness and thus preparedness within EBCG. **PM1.2.9** and **PM1.2.10** (both proposed under **PO2**) would require additional safeguards for two reasons. The first reason is the need to ensure alignment with the principles of data minimisation and purpose limitation. The second reason is the need to avoid negative societal impacts, such as discriminatory profiling or misuse in the context of data added under **PM1.2.9** and the use of social media monitoring under **PM1.2.10**. These would counterbalance the operationally positive impacts of reinforcing the forward-looking approach, response capabilities, the earlier detection of smuggling routes, recruitment and facilitation. The overall score of measures under PO1 and PO2 would therefore

[77] Most national authorities (65% – 23 out of 35) that responded to the survey of 17 Member States agreed or strongly agreed that Frontex should conduct country-risk analyses.

be the same. This also feeds into the broader consideration of whether increasing the volume and categories of personal data to be processed within the framework of EUROSUR would enhance EUROSUR's ability to fulfil its stated objectives – or hinder it. Achieving near real-time situational awareness requires more complete, timely and accurate data. It does not necessarily require any processing of personal data. Additional roles for EUROSUR (e.g. hypothetical EBCG-wide exchanges of potentially relevant personal data) could compromise and distract attention from this overarching situational-awareness-related objective. Policy measures in **PO3** (**PM1.2.12-PM1.2.18**) would therefore score lower. Broadening the scope of personal data that could be processed in EUROSUR would redefine EUROSUR's purpose and could increase situational awareness and predictive capabilities, but it would also have significant **economic impacts** and require dedicated resources that would have to be diverted from elsewhere – thus undermining the **operational impacts**. Incomplete or incorrect operationalisation could result in no improvement in situational awareness and an inability to perform the expected additional tasks. It could also have negative **operational and institutional impacts**. In addition, **PM1.2.12-PM1.2.18** would require the establishment of an entirely new framework for oversight and data protection compliance – in order to prevent potential negative **social impacts** such as violations of data subjects' rights, disproportionate surveillance and the social reactions that these impacts would reasonably generate.

**Impacts of policy measures responding to PD1.3.** Measures covering collaboration between Frontex and **key third countries and CSDP missions and international organisations** are expected to have a positive impact across all options (particularly on third-country border management authorities; international organisations and CSDP missions; Member State authorities and border guards; EU citizens; and migrants and asylum seekers). The measures proposed under all three options would enable Frontex to work with these partners more effectively. They would also have an overall positive **institutional and operational impact** on border and migration management – the measures proposed under Options 1 and 2 and PM1.3.8 (which proposes that Frontex should support/join Member States' bilateral arrangements with third countries) emerging as the most impactful thanks to their cumulative effect, with the result that Option 3 scores the highest. Faster and more flexible arrangements could also enable more capacity-building, training and joint initiatives with key third countries; as well as build public confidence in the EU's border and migration management efforts in these countries and their regions (**social impact**). A more flexible deployment of Frontex liaison officers would allow resources to be allocated more efficiently, thus eliminating unnecessary administrative burdens. Enhancing Frontex's flexibility in cooperating with international organisations under both PO1 and PO2 would enable collaboration with organisations that are relevant prospective partners but currently out of scope (**institutional and social impact**).

**Impacts of policy measures responding to PD1.4.** The overall objective of measures proposed in the area of **return** is to strengthen **operational impacts** (particularly on Member States and national authorities that are responsible for returns) – first and foremost by increasing the number of effective returns from the EU to third countries. Measures such as requiring the adoption of EU-level guidance document and aligning planning cycles (**PM1.4.1A**) and, even more so, making Frontex the main EU actor on return as well as pre-return and post-return related activities (**PM1.4.1B**) would increase EBCG-wide coordination – identifying and exploiting synergies while ensuring that returns across the EU are performed coherently and in consistent compliance with high standards. This would in turn have various positive **social impacts**, particularly for returnees. Returnees would benefit from uniformly high standards for treatment across pre-return, return, and post-return, in full compliance with EU law and international standards. These measures would also boost the effectiveness of the EU's return framework as a whole – leading to the timely return of a greater share of persons currently residing in the EU without a legal right to stay. This could in turn increase the credibility of the EU's return framework – thus not only increasing citizens' trust in the EU institutions but also discouraging attempts to enter illegally that all too often involve dangerous methods and result in loss of human life. A similar logic applies to **PM1.4.5B** (establishing the legal bases for Frontex's reintegration activities

so that it can assume greater responsibility for reintegration efforts through the Frontex EURP and play a role in digitalisation) and **PM1.4.18** (on Frontex supporting the development of standardised return counselling and reintegration counselling across the EU). Extending reintegration support for returnees to more countries would have a significant **operational impact** because earlier counselling to more people and with a wider geographic reach would improve access to voluntary returns, which are operationally cheaper and easier to arrange. This approach would also have the positive **social impact** of providing better support for persons in vulnerable situations and promoting sustainable reintegration, thus making the return process more humane and predictable. Similarly, standardised return counselling and reintegration would improve reintegration outcomes and have a significant **social impact** for returnees, who would receive more uniform and timely information as well as high-quality assistance tailored to their specific circumstances. **PM1.4.16B** (enabling Frontex to support third-country-to-third-country returns) would have a varied social impact. From the **institutional impact** standpoint, Frontex support could alleviate migratory pressure on partner countries along migratory routes towards the EU, thus building trust with third countries' authorities and facilitating broader cooperation. From the **social impact** point of view, helping people to return home from places where they may have become stranded while making their way towards the EU should help to prevent them from falling prey to migrant smugglers and human traffickers. Frontex's support to third countries is also an opportunity to promote the application of good practices and strengthen cooperation with third countries. Potential risks exist, but appropriate safeguards should be put in place to ensure that Frontex operates in full compliance with EU law and international standards. **PM1.4.16B** will therefore need to be accompanied by appropriate safeguards and carried out alongside pragmatic mitigating measures. Stronger, more transparent and accountable **governance for returns** paired with adequate oversight could result in positive **operational impacts** (for example, more effective monitoring; stronger overall compliance with safeguards; enhanced timeliness and quality of investigations into incidents; and robust responses to identified wrongdoings and potential cases of fraud), thus fostering a culture of responsibility and accountability within Frontex and the EBCG as a whole. Such measures could in turn foster positive **social impacts** that are related to public confidence in the EU's capacity to manage migration flows and external border security in a manner that upholds EU values and legal standards. They could also discourage cross-border crime. A recognised role for working groups (e.g. the HLRTR and the EIBM working group) and strengthened coordination would have positive **operational impacts** (including more effective cooperation and improved oversight of the Management Board on return activities) and could ensure quality assurance on the return framework – addressing technical, operational and implementation issues more efficiently and ensuring operational focus (**PM1.4.19B**, **PM1.4.20 and PM1.4.21**).

**Impacts of policy measures responding to PD2.1 (standing corps).** The introduction of a **new Category 5** is, along with targeted top-up training, expected to have considerable positive **operational impacts** – primarily by promoting a more harmonised understanding and uptake of common EU standards and principles of EIBM by all the EBCG's officers. Related measures (e.g. **PM2.1.1B** establishing Category 5 as a capabilities-harmonisation reserve within the standing corps), would strengthen interoperability in joint operations as well as enhance mutual trust, officers' preparedness and the professionalism of all EBCG staff. The policy measures could improve conditions for **standing corps officers** by making Frontex a more attractive employer that offers the possibility of a long-term, transparent career path. This would involve improving officer motivation, compensation and employment conditions. The measures would also have the **institutional impacts** of providing the EBCG as a whole with a 'common language' for border management. That would enable each national authority (and Frontex) to use the available resources with greater impact and flexibility. These measures could also improve the overall quality and consistency of Frontex deployments, thus making the workforce more stable and professional. These impacts would translate into positive **social impacts**. An interoperable workforce at the external borders that operates according to uniform and consistently high standards would translate into smoother and more efficient border-crossing

experiences for legal border-crossers (e.g. travellers and traders). It would also more effectively hinder cross-border crime, thus making communities safer and reducing crime in our society as a whole. This cascade of positive impacts would grow over time (along with the increase in the number of officers that will undergo EIBM training to qualify as Category 5 officers and then go on to apply this training in their daily tasks and deployments).

**Impacts of policy measures responding to PD2.2.** Measures across all policy options in relation to **equipment** primarily affect operational delivery capacity (availability, deployability and reliability of technical equipment and related IT enablers). Their impacts are therefore mostly indirect, building towards reduced disruptions for lawful travellers and border communities – due to operations becoming more predictable and effective; more consistent border surveillance and response; and improved safety and working conditions for deployed staff (thanks to less ad hoc logistical support and fewer operational disruptions). This explains why the overall social impact score remains positive but limited across all the options. Under **PM2.2.1** (**PO1**), the key added value would be greater legal clarity on Frontex tasks linked to the management of ETIAS and FADO that have a small positive social impact. This greater legal clarity would be achieved by reducing uncertainty and supporting a more coherent implementation of EU border-management IT systems. However, **PO1** does not materially change the underlying model of technical equipment availability (TEP levels and recurring shortages remain broadly driven by existing planning and budget constraints), so wider social effects are expected to remain limited. Under **PO2**, the proposed measures are expected to contribute to more reliable deployments and better workflow continuity (**PM2.2.2**-**PM2.2.7** will reduce the time lost to avoidable logistical problems and administrative friction). This could in turn slightly improve staff safety and working conditions as well as increase the predictability of operations for border communities. It is nevertheless important to note that these are enabling measures whose effects depend on practical uptake. The net social impact therefore remains moderate rather than transformative. Under **PO3**, the approach builds on **PO2** and supports a more strategic technical capability model for border surveillance. This includes options that would gradually reduce reliance on short-term ad hoc arrangements (for example, through scenarios in which Frontex moves towards a more substantial aerial and maritime capability) and associated operational support functions (**PM2.2.8**-**PM2.2.12**). This could over time strengthen the predictability of surveillance support and resilience in specific high-pressure contexts. That could in turn translate into modest positive social outcomes (perceptions of security and reduced disruption). However, the societal effects remain largely indirect and implementation-sensitive. The overall score remains limited because the primary impact channel is operational and budgetary (any broader societal effects would be incremental and contingent on safeguards and good governance).

**Impacts of policy measures responding to PD3.1.** Measures related to the standing **corps training** are expected to have an overall positive impact across all three policy options. From the **operational** perspective, the suggested policy measures (e.g. **PM3.1.3, PM3.1.7, PM3.1.10 and PM3.1.11**) would strengthen cooperation and facilitate interoperability in multinational settings. This would in turn improve the preparedness and readiness of the standing corps for operational deployments – especially by filling the gaps in scarce, specialised profiles. Similarly, the measures proposed for training are expected to have a significantly positive **social impact**. They would make the training quality of the growing standing corps more stable, harmonised and consistent (e.g. **PM 3.1.1**, **PM3.1.4**, **PM3.1.12 and PM3.1.13**). This would foster homogeneity and a shared operational culture across the EBCG (e.g. **PM3.1.15**). It would also enhance mutual trust between national and EU staff and improve the quality of service provided to the EU's citizens – thanks to consistently high common professional standards. Proposed measures such as **PM3.1.9** would also create clearer and more predictable professional pathways and long-term career development for standing corps officers. The proposed measures would therefore increase motivation and the attractiveness of joining the standing corps; improve staff retention in Frontex; and boost staff mobility – thereby further contributing to an interoperable standing corps architecture. Some policy measures (e.g. **PM3.1.6** and **PM3.1.14**) could

also have a positive impact on broader employment opportunities at the Member State and/or EU levels.

**Impacts of policy measures responding to PD3.2.** Proper **EIBM planning** is expected to have a positive **operational and institutional impact** because it will boost coordination, transparency and institutional learning across the EBCG. The measures proposed for EIBM planning would make joint actions more coherent, strengthen trust among actors and support more effective prioritisation across the system. Similarly, improved transparency would foster good-faith cooperation and collective situational awareness. As regards the Annual EIBM Strategic Outlook, the social impact would be moderately positive – through enhanced coordination, transparency and institutional learning across the EBCG network. These impacts could be further enhanced through a careful selection and design of the KPIs and responsibilities of the National EIBM Planning Coordinator, in line with **PM3.2.12**. All the measures proposed across the different options for integrated planning would have a moderately positive or positive impact. This is because they strengthen the link between risk analysis / vulnerability assessment outputs and capability planning; clarify roles and timelines; and promote more consistent follow-up and accountability across the EBCG network. However, measures proposed under PO3 (**PM2.3.17-PM3.2.20**) could increase the administrative burden and therefore affect the overall score. The **social impact** of the **vulnerability assessment** follow-up (e.g. **PM3.2.14**) and the **oversight for EIBM planning** is moderately positive. This latter measure builds on established mechanisms rather than creating new ones. It is therefore proportionate and creates a politically acceptable way to strengthen accountability without increasing administrative burden – thereby resulting in positive social and institutional impacts. The other social impacts of expending vulnerability assessment would be moderately positive. Expanding the scope of vulnerability assessment to returns (**PM3.2.7**) would improve transparency, preparedness and coordination in a sensitive policy area – by developing situational awareness of operational readiness in returns. Moreover, planning for the voluntary inclusion of EU candidate and potential candidate countries (**PM3.2.8**) could build trust and smooth future integrations – thanks to enhanced cooperation, preparedness and structured engagement.

### 6.3 Environmental impacts

Overall, the policy options and measures are not expected to have significant environmental impacts – either positive or negative. Some individual measures could have positive environmental impacts, particularly by potentially reducing the carbon footprint of Frontex's activities (e.g. measures that expand its coordinating role on returns; and planning and pooling resources that would reduce wasted flight capacity and emissions per returnee). Similarly, for the use of advanced technologies (for example, to enhance situational awareness): access to an upgraded situational picture would enable the more effective deployment of officers and resources (e.g. fewer and more targeted interventions along a border section that is being monitored with advanced technology such as sensor suites). However, these effects are likely to be minimal because the expansion of the Frontex's mandate and the larger volumes of activities undertaken (e.g. in the areas of returns) will offset these gains and result in limited negative environmental impacts (due, for example, to the need to build, heat and maintain larger infrastructure for headquarters and training centres or to hold practical scenario-based exercises that simulate complex operational context). Frontex's acquisition of more technologically advanced assets (e.g. for aerial surveillance or maritime patrolling) could be seen as having a direct negative environmental impact – but for the fact that these assets would operationally complement or replace assets operated by the national authorities [78], which may be less technologically advanced and/or have a worse environmental footprint.

[78] This has been the case for aerial surveillance in some of Frontex's operational theatres.

### 6.4 Impacts on fundamental rights

*Figure 6. Overview of impacts on fundamental rights across thematic areas and options*

| Problem/Driver | Thematic area | PO1 | PO2 | PO3 |
|---|---|---|---|---|
| **PD1.1** | **Border management** | **3** | **3** | **2** |
| **PD1.1** | **Border controls** | **1** | **1** | **1** |
| **PD1.1** | **Countering cross-border crime** | **-1** | **N/A** | **N/A** |
| **PD1.1** | **Emergencies and hybrid threats** | **N/A** | **0** | **N/A** |
| **PD1.1** | **Visa policy** | **N/A** | **1** | **1** |
| **PD1.2** | **EUROSUR** | **-1** | **-1** | **-2** |
| **PD1.3** | **Cooperation with third countries and CSDP missions** | **0** | **0** | **1** |
| **PD1.3** | **Cooperation with international organisations** | **0** | **0** | **0** |
| **PD1.4** | **Returns including governance** | **1** | **1** | **-1** |
| **PD2.1** | **Standing corps architecture** | **1** | **1** | **1** |
| **PD2.1** | **Employment conditions for the standing corps** | **0** | **0** | **0** |
| **PD2.2** | **Technical equipment and IT systems** | **0** | **0** | **0** |
| **PD3.1** | **Standing corps training** | **1** | **2** | **2** |
| **PD3.2** | **EIBM management strategic and integrated planning** | **0** | **0** | **0** |
| **PD3.2** | **Quality-control mechanisms** | **1** | **1** | **1** |

The impacts on fundamental rights related to the proposed measures primarily concern third-country nationals that are subject to the EBCG's border-control and migration-management activities. The impact on EU citizens' fundamental rights is limited or positive – thanks to strengthened border management and the countering of cross-border crime. Measures related to Frontex's human and technical capabilities **(PD2.1 and PD2.2**) will not have a direct impact on fundamental rights.

**Impacts of policy measures responding to PD1.1**

**Border management thematic area.** More efficient standing corps deployments at external borders would moderately improve respect for fundamental rights (e.g. the right to free movement and the right to good administration) by making operations faster, safer and more effective – while also minimising risks from understaffing or limited powers. The Age's oversight bodies would continue to ensure Frontex's compliance with EU law across all its tasks and activities.

**Combating cross-border crime thematic area.** The measures proposed under PO1 for combating cross-border crime should have a neutral impact on fundamental rights because Frontex has an overarching obligation to comply with EU law in all its operations [79]. For example, broader data-sharing powers (**PM1.1.6 and PM1.1.8**) could facilitate an increased volume of transmissions of operational personal data by Frontex and could thus increase associated data protection-related risks, but these risks are mitigated by the overall strong procedural safeguards in the applicable EU legal instruments (including the GDPR, EUDPR and the regulations of the relevant agencies) as well as the national legal frameworks. Moreover, the data in question would concern serious cross-border crime and a more effective framework for its transmission would contribute to guaranteeing the safety and well-being of all affected people – be they migrants who fall prey to these criminal groups; citizens in communities affected by their activity; or even the officers that are tasked with disrupting their criminal activity and can at times be faced with violence as a result. Any potential risks can and should be mitigated – firstly by carefully delineating the tasks and responsibilities of Frontex, Europol, Eurojust and the national authorities; and secondly by ensuring that the appropriate structural safeguards are in

[79] In the call for evidence, one contribution (jointly prepared by six NGOs) highlights the point that the strict necessity requirement in Article 90 reflects the highly sensitive nature of personal data that may be processed in migratory and border contexts. The contribution therefore stresses the point that this requirement should not be altered; input from DG JUST.

place atFrontex. Frontex's role in combating cross border crime could also have a moderately positive impact (for example, as regards the right to liberty and security).

**Impacts of policy measures responding to PD1.2.** Expanding Frontex's ability to enrich **EUROSUR** situational awareness by processing additional personal data can have an impact on personal data processing – particularly in the context of potentially more 'invasive' activities proposed under PO3 (e.g. adding new types of personal data (**PM1.2.12**) or social media monitoring (**PM1.2.13**)). These risks will nevertheless be significantly mitigated by the safeguards that are in the EU data protection framework and that could be complemented by additional safeguards specific to any additional data-processing activity that may be deemed necessary for the fulfilment of Frontex's mandate. For example, monitoring social media platforms could increase the EU's ability to manage illegal migratory flows, but the activity must be performed for the clear, limited and targeted purpose of producing aggregated and anonymised data for risk analysis – and must not result in collection, storage or undue processing of personal data.

**Impacts of policy measures responding to PD1.3.** Measures that are proposed with regard to **cooperation with third countries, CSDP missions and international organisations** – such as aligning the procedure for signing working arrangements to other JHA agencies (**PM1.3.1**) – should have a neutral fundamental rights impact. They would have the positive impact of expediting the procedures related to working arrangements without diminishing the data protection framework, in line with EDPS' overall oversight role based on the EUDPR. **PM1.3.7** makes Frontex a main partner in EU-funded border management projects and would have a neutral impact because full regard must be paid to fundamental rights when implementing such projects – regardless of the entity tasked with them. **PM1.3.8** enables Frontex to join or support bilateral agreements between Member States and third countries, and could have positive impacts on fundamental rights due to the involvement of Frontex's operational apparatus and the broader application of EIBM standards.

**Impacts of policy measures responding to PD1.4.** Most policy measures proposed under **PO1** and **PO2** would have a positive impact on fundamental rights. Some preferred measures would create a more efficient and uniform return mechanism (for example, **PM1.4.1A** would introduce an obligation to adopt EU-level guidance documents and shared planning cycles; **PM1.4.14B** would make Frontex the default EU operational actor for returns; and **PM1.4.1B** would allow Frontex to administer resources according to a shared return calendar). This would in turn enhance and standardise the safeguards for returnees across all Frontex-supported return activities, because streamlined processes would shorten the duration of return processes. Harmonised standards would ensure that identification is conducted transparently and with respect for data protection rules. Measures such as **PM1.4.15** (on the development of uniform standards on return monitoring) and **PM1.4.18** (on Frontex performing standardised return counselling) would achieve a similar degree of consistency and standardisation for return monitoring and for the provision of counselling to prospective returnees, respectively – while also encouraging voluntary returns. However, measures such as **PM1.4.16B** (extending Frontex support to third-country return operations) represent potential risks in terms of differences between the EU's legal framework and third-country procedures. These can be mitigated through appropriate safeguards (e.g. ensuring compliance with international standards or including relevant protections in legally binding instruments). These considerations will depend on the specific form of support that Frontex may provide and on how such support could be framed in this regulation in terms of scope, legal bases and associated prerequisites and safeguards. In all scenarios, potential negative fundamental rights impacts will be significantly mitigated by ensuring that clear legal safeguards are put in place and that ad hoc, scenario-based mitigating measures are agreed upon and implemented at the operational level.

**Impacts of policy measures responding to PD3.1 (training).** Overall, the measures proposed across the different policy options would have a positive impact on fundamental rights. The proposed measures (e.g. **PM3.1.1**) would – by systematically embedding fundamental-rights-sensitive training

in both curricula and practical exercises, as well as by strengthening the enforceability and monitoring aspects – support the adoption of a uniform approach to fundamental rights protection and compliance in EU border management. Moreover, some of the proposed measures (e.g. **PM3.1.3**) would ensure that decisions with human rights implications (e.g. identification and referral of vulnerable persons, and conditions for the use of force and cultural mediation) could also be carried out and internally applied in realistic training settings. A stronger and more consistent training coverage in certain areas (e.g. use of force and return procedures) could also standardise the uptake of more human-rights-compliant approaches to these tasks. Achieving a more uniform and consistently high performance in all border management and return-related tasks throughout the EBCG (as proposed by measures such as **PM3.1.9** and **PM3.1.12**) would have additional positive fundamental rights impacts (for example, more consistent identification and provision of support to persons in vulnerable situations or seeking international protection; and overall smoother and more efficient facilitation of legitimate border crossings). These positive impacts would be further guaranteed by the parallel reinforcement of the existing monitoring and quality assurance framework; and increased by the direct link to EIBM in the Common Core Curriculum and the training curriculum for the new Category 5 – where fundamental rights compliance features as a horizontal, overarching component.

The **horizontal objective** of maintaining internal oversight capacities at the current level in relation to Frontex's planned growth means that several policy measures should be accompanied by improvements to the existing structures. The measures proposed to improve the governance on returns would make a particular contribution to this: strengthening the role and coordination between the HLRTR and the EIBM Working Group and the Management Board, through quality assurance on the return framework (**PM1.1.20**); and establishing a dedicated working group on returns that would address technical, operational and implementation issues with appropriate reporting to the Management Board (**PM1.4.21**). Moreover, enhancements of the capacities of the Frontex's key oversight bodies proposed under **PM3.2.16** would make it possible to preserve the existing framework and safeguards; and mitigate any oversight deficiencies that could arise from Frontex's increase in size and tasks. Overall, the implementation of PM3.2.16 in parallel with the other policy priorities would preserve Frontex's overall good governance framework and its ability to ensure legal compliance.

## 7. HOW DO THE OPTIONS COMPARE?

This section brings together the results of the preceding impact analysis in order to examine how **each option** performs against the **key criteria of effectiveness, efficiency and coherence**. It also highlights their **relative strengths and weaknesses**. It then compares the options, presenting their overall performance across the different criteria. The method for rating the measures and the guiding questions for each criterion are presented in detail in **Annex 4**. The effectiveness and efficiency of the analysed measures are described under the same section in order to avoid repetition. This comparative analysis of the policy options is summarised in a table in **Annex 9**.

### 7.1 Effectiveness and efficiency

Effectiveness is the extent to which the measures under the different policy options are expected to contribute to the identified objectives in Section 4. The measures proposed across the different policy options could address the general objective referred to in Section 4.1. For the specific objectives identified in Section 4.2, the only relevant measures are those that are proposed in order to address one specific problem. **SO1** is accordingly expected to be achieved by policy measures that have been identified in response to Problem 1 (**PM1.1.1-PM1.4.19**). The relevant policy measures for **SO2** (**PM2.1.1A-PM2.2.12**) respond to Problem 2. The relevant policy measures for **SO3** respond to Problem 3 (**PM3.1.1-PM3.2.20**). Figure 7 illustrates the relationship between the policy objectives and the assessment criteria, which served as independent benchmarks for evaluating the potential effectiveness of the options.

As regards efficiency, the analysis below reflects the impacts identified in Section 6.

*Figure 7. Links between objectives and assessment criteria*

| General objective | Specific objectives | Assessment criteria per problem |
|---|---|---|
| **Ensure the development and implementation of EU integrated border management in line with Article 77(1)(c) of the Treaty on the Functioning of the European Union, (encompassing well-coordinated and effective management of the EU's external borders, returns and visa policy; and measures at the external borders that contribute to EU security) in order to increase the EBCG's effectiveness** | **SO1** – Ensure Frontex's effectiveness in supporting Member States (and Schengen Associated Countries) in managing the EU's external borders – including by cooperating with various actors (relevant third country authorities; Member States' authorities, including those involved in combating cross-border crime, returns and visa; relevant EU agencies; and international organisations).<br>Ensure that the prevention of illegal arrivals, the effectiveness of returns and situational awareness via EUROSUR are enhanced. | • Ref. PD1.1: coherence of the conditions across the EU for the standing corps to support border control tasks – combined with increased demand for standing corps;<br>• Ref. PD1.2: increased numbers of entries into EUROSUR and of national authorities accessing EUROSUR;<br>• Ref. PD1.2: increased number of reports (single events and incidents) introduced into EUROSUR;<br>• Ref. PD1.3: increased number of third countries cooperating with Frontex on border management;<br>• Ref. PD1.4: increased number of training and capacity-building activities on returns delivered to third countries;<br>• Ref. PD1.4: initiation of negotiations for new/updated status agreements to allow return-related operational support and/or reflect new possibilities regarding returns;<br>• Ref. PD1.4: increased percentage of overall effective EU returns performed with Frontex support or coordination (year-on-year);<br>• Ref. PD1.4: increased overall percentage of returns from the EU that are performed as voluntary returns with Frontex support or coordination. |
| | **SO2** – Strengthening the EBCG's human and technical capabilities (including by improving the operational effectiveness and efficiency of the standing corps and procedures applicable to the technical capabilities). | • Ref. PD2.1: increased recruitment of the standing corps across the EU paired with the increased use of standing corps across the Member States (at national level and in other Member States);<br>• Ref. PD2.2: expected increase in technical equipment made available to the Member States by Frontex. |
| | **SO3** – Ensure the coherent design and implementation of EIBM across the EU Member States on the basis of harmonised training; synergies in planning; reinforced quality-control processes; and a standing corps of 30 000 officers equipped with state-of-the-art equipment. | • Ref. PD3.1: increased capacity and offer in Frontex training paired with an obligatory and comparable set of skills for the standing corps;<br>• Ref. PD3.2: an increased number of national plans on which Frontex has been consulted paired with an increased number of deficiencies in border management and returns addressed at an early stage. |

With regard to **SO1**, the *effectiveness* of **PO1** would be based on the optimal positive effects of measures responding to **PD1.1** (i.e. the border controls thematic area and the combating cross-border crime thematic area. The remaining two thematic areas (emergencies and hybrid threats, and visa policy) would not contribute in the absence of any measures proposed under **PO1**. Legislative clarifications (for example, on executive powers) would standardise conditions for standing corps across the EU, thus addressing current ambiguities. In parallel, the proposed measures would ensure synergy with the efforts to promote a broader and more uniform uptake of EIBM, thus contributing significantly to the general objective.. In these two thematic areas of **PD1.1**, the *efficiency* of **PO1** measures would have very positive institutional and social impacts (3); positive impacts on fundamental rights (1) – except TA on combating cross-border crime (-1); and limited negative economic impacts related to the costs of implementation (for example, the costs of infrastructure and

tools relevant for accessing databases) (-1), but these do not undermine their optimal added value. **PO1** performs less well in terms of *effectiveness* for the other aspects covered by Problem 1: **PD1.2** (EUROSUR), **PD1.3** (external dimension) and **PD1.4** (returns). In the case of **PD1.2**, **PO1** contributes to **SO1** by enhancing EUROSUR but does not go beyond the current framework and therefore underdelivers on GO. In terms of *efficiency*, it has limited positive social impacts (2) and slightly negative impacts on fundamental rights and economic impacts (-1). In the cases of **PD1.3 and PD1.4**, the proposed measures respond to the most acute problem drivers but do not live up to the level of ambition as regards border management objectives in tiers 1 and 2 of the access control model in third countries as well as in return policy. In terms of *efficiency*, the social impacts exceed the economic impacts when it comes to cooperation with external actors (PD1.3) and counterbalance each other in the case of returns (PD1.4). Impacts on fundamental rights are neutral to moderately positive.

As regards **PO2**, the measures proposed with regard to **PD1.1** are the same as under PO1 for the first two thematic areas. With regard to the remaining thematic areas (emergencies and hybrid threats, and visa policy), the proposed measures offer satisfactory added value in the absence of measures proposed under PO1 and PO3. They score relatively highly (2) in social impacts with no economic impacts and therefore have moderately high *efficiency*. Overall, PO2 has good results in terms of **SO1** with regard to **PD1.2** (EUROSUR). This is because it complements the measures proposed under PO1 by expanding the information processed through the system to enrich the situational picture and by extending it to important strategic areas such as returns (thereby also complementing other measures to pursue objectives in that policy area). The *efficiency* of **PO2** in EUROSUR is slightly lower than that of PO1 due to higher economic impacts (-2). With regard to **PD1.3**, the *effectiveness* of the measures proposed under **PO2** is comparable with that for PO1 as regards cooperation with third countries and the CSDP missions thematic area. This is because they build on PO1 and because PM1.3.7 (added under PO2) only complements these measures in terms of legal certainty. However, the effectiveness of the measures proposed with regard to the cooperation with international organisations thematic area is greater than under PO1 because it offers a solution that is more future-proof (with PM1.3.6B). The *efficiency* of **PO2** with regard to measures responding to **PD.1.3** is positive overall – with limited negative economic impacts (-1/-1), moderate positive social impacts (2/2) and a neutral impact on fundamental rights across the thematic area (0/0). As regards **PD1.4**, the *effectiveness* of the proposed measures goes a step further than PO1. This is thanks to a more comprehensive set of measures; the identification of shared needs among the Member States; and the provision of EU-level tools and coordination mechanisms that individual Member States or national return actors could not develop.

Measures in **PO2** regarding organisational governance are relevant here because they reflect the existing deficit in the representation of return actors in Frontex's decision-making structures. These measures ensure effectiveness by recognising the existing expertise in key Frontex working groups (e.g. the HLRTR and WG EIBM). They are intended to formalise their role in Management Board proceedings in order to guarantee better strategic steering and quality assurance on returns in Frontex decision-making. The *efficiency* of the measures proposed in response to **PD1.4** remains positive despite heavier economic impacts (-2) that are, however, counterbalanced by moderate positive social impacts (2) and limited positive impacts on fundamental rights (1).

As regards **PO3**, the effectiveness and efficiency of measures responding to **PD1.1** (except in the visa thematic area) remains the same (in the absence of new measures, as compared with PO1 and PO2). With specific regard to the visa policy thematic area, *efficiency* decreases slightly due to the higher negative economic impact (-1). With regard to **PD1.2**, *effectiveness* remains at the same level as under PO2 because the proposed measures build on PO1 and PO2 (adding new elements whose role in increasing the use of EUROSUR cannot be assessed at this stage because some of the proposed measures would alter the purpose of EUROSUR as a purely situational-awareness tool). However, the

efficiency of measures proposed under **PO3** decreases because they have the highest negative economic impact (-3) and this is not offset by the positive social impact (1), which is lower than under PO2, and the negative impact on fundamental rights (-2). As regards **PD1.3** (the external dimension), the *effectiveness* and *efficiency* of the measures proposed for the thematic area on cooperation with third countries and CSDP increases, while the thematic area cooperation with international cooperation remains at the same level (in the absence of new measures). For cooperation with third countries, **PM1.3.8** should (on top of all the measures proposed under **PO1** and **PO2**) contribute to the objective of increasing the formalised cooperation ties involving Frontex and third countries by also providing Frontex with the flexibility to, where appropriate, join or support existing bilateral cooperation agreements between Member States and third countries. The *efficiency* of **PO3** with regard to the thematic agreement on cooperation with third countries and CSDP should increase – thanks to the positive social impacts (3) and impact on fundamental rights (1) and despite the negative economic impacts (-2). With regard to **PD1.4** (returns), **PO3** remains highly effective, but its efficiency is negative due to high economic costs (-3) and the negative impact of fundamental rights (-1) as well as to efficiency constraints in the area of governance due to the multiplication of actors in the decision-making processes. These are not offset by the positive social impacts (2).

Regarding **SO2**, the *effectiveness* of **PO1** with regard to **PD2.1** (the **standing corps architecture** thematic area) is because the solutions to the identified deficiencies would hamper effective Frontex deployments both now and in the future. This can only be achieved by building in strong synergies between the national and EU objectives in policy recruitment, but that is only possible with the new category of the standing corps proposed under these two POs. The *efficiency* of **PO1** in this regard is significantly affected by the proposed model's high economic costs due to the increase in the standing corps to 30 000, based on simple tripling all current categories (-3). This element is barely offset by the overall positive social impacts (2) and impacts on fundamental rights (1). With regard to the thematic area on **employment conditions**, **PO1** measures provide a solid basis for addressing the identified problems, which are then fully reflected in **PO2** and **PO3**. They are also *efficient*, thanks to positive economic and social impacts (2 each), while the impact on fundamental rights is neutral. In view of the model applied to achieving 30 000 standing corps, the *effectiveness* of **PO2 and PO3** in the thematic area on **standing corps architecture** is higher than for **PO1**. As regards the *efficiency* of the proposed measures, both **PO2** and **PO3** have high social impacts (3) and a positive impact on fundamental rights (1). Their economic impacts are slightly less negative under **PO2** (-1) than **PO3** (-2), but this does not affect the overall assessment of efficiency for these two options. For the thematic area on **employment**, measures proposed under **PO2** score better than **PO3** in terms of effectiveness, because **PM2.1.14** might be more difficult to implement. In terms of *efficiency*, **PO2** scores better (2) than **PO3** (1) due to better social impacts (**PO2 -2** and **PO3 -1**), while the positive economic impacts are the same (1) and there is no impact on fundamental rights. The *effectiveness* of measures proposed under **PO1** to address **PD2.2** (**technical equipment**) is positive but limited because it is focused on IT systems alone. The *efficiency* of this policy option is also positive (albeit limited) overall, with only social impacts standing out (1). The *effectiveness* of **PO2** is much greater than for PO1 – thanks to its comprehensive approach to obstacles in interoperability, procurement and logistics. **PO2** is also balanced in terms of efficiency – thanks to limited negative economic impacts (-1), positive social impacts (1) and the neutral impact on fundamental rights. **PO3's** large-scale asset acquisition offers greater operational value but the high economic and logistical costs counterbalance its coherence and efficiency gains.

As regards **SO3**, the measures proposed under **PO1** with regard to **PD3.1 (training**) provide a solid basis for measures that are also proposed under **PO2** and **PO3**. Structural improvements in the training architecture produce a positive result in *effectiveness*. The *efficiency* of **PO1** is positive because the limited negative economic impacts (-1) are more than counterbalanced by the very positive social impacts (3) and the positive impact on fundamental rights (1). **PO2** maintains a positive balance in terms of *effectiveness*, because the proposed measures should, on top of **PO1**, make it possible to

accommodate the new Category 5 of the standing corps. The *efficiency* of **PO2** also remains positive because its high positive social impact (3) and positive impact on the fundamental rights (2) more than counterbalance its higher negative economic impacts (-2). **PO3** (including not only **PO1** but also the structured leadership training pathway and dedicated EU top-up training for the category under **PO2**) ensures the best *effectiveness*, particularly by further scaling up training for Category 1. However, the *efficiency* of **PO3** is undermined by the negative economic impacts (-2), although these are counterbalanced by the same high positive score in terms of social (3) and fundamental rights (2) impacts as in **PO2**. The effectiveness of the measures proposed under **PO1** in response to **PD3.2 (the planning and quality assurance thematic areas)** would be compromised by the non-legislative character of measures proposed with regard to EIBM planning; weak interoperability; and the absence of measures to ensure follow-up to vulnerability assessment and general reinforcement of quality-assurance structures within Frontex. The *efficiency* of PO1 would be slightly positive, with limited positive economic and social impacts under both thematic areas (1), a neutral impact of the measures concerning planning on fundamental rights (0) and a limited positive impact of the measures concerning vulnerability assessment on fundamental rights (1). *Effectiveness* is expected to increase under **PO2** – due to more probable progress in ensuring planning coherence and strategic coordination; and due to much more robust modifications in quality assurance (based not only on widening the scope of vulnerability assessment but also on ensuring appropriate follow-up to the recommendations issued in this process – including in relation to EIBM planning – and on proposals that reflect the necessary changes in terms of internal oversight). The *efficiency* of **PO2** remains consistently positive. There are limited positive economic impacts (1) and social impacts (2) across this thematic area. Only impacts on fundamental rights differ slightly between thematic areas (0 for EIBM planning and 1 for changes related to quality control mechanisms). Measures proposed under **PO3** also score highly in terms of *effectiveness* – despite their higher administrative and political burdens in relation to EIBM planning (quality assurance measures remain the same as under PO2). The *efficiency* of **PO3** is comparable with that of PO2 – the only difference concerns the slightly lower social impacts of measures related to EIBM planning (1 instead of 2).

### 7.2 Coherence

Internal coherence assesses how various elements of the proposed options are expected to work together to achieve the objectives. External coherence assesses how they would complement the developments in other areas relevant for the measures at stake. All **policy options (POs)** are designed to be coherent with the general objective and in principle, the measures under each PO are designed to be compatible with each other. This is reflected in the cumulative character of several measures, often with **PO3** encompassing measures proposed under **PO1 and PO2**. However, in few cases the proposed measures relevant for specific problem drivers are mutually exclusive. The policy measure numbering reflects this (e.g. measures proposed with regard to the size of the standing corps marked as **2.1.1A** under **PO1**, **2.1.1B** under **PO2** and **2.1.1.C** under **PO3**).

Regarding the coherence of measures addressing **standing corps employment conditions (PD2.1**), under **PO1** and **PO2**, measures such as ensuring compensation for shift or arduous work enhance attractiveness and fairness, while measures linked to training (**PM 2.1.12**) and long-term career paths (**PM 2.1.13**) more clearly define contract pathways. These measures could be developed through delegated acts[80] or the amendment of the EBCG Regulation, while continuing to ensure coherence with the broader EU administrative framework. The proposed measures would respond to limitations which do not take into account that standing corps staff operates under different working arrangements (e.g. shift work) of the host Member States and is deployed to various operational areas that diverge

[80] E.g. Related to Council Regulation 300/76 (shift work), Council Regulation 495/77 (stand-by duty) and Council Regulation 858/2004 (arduous working conditions).

in terms of hardship working conditions (e.g. safety of staff, place and nature of work). They would alleviate administrative and financial burden of the current deployment system, which currently entails processing and managing a substantial number of mission orders and claims. Both **PO1** and **PO2** improve alignment with the objectives of the EBGC Regulation and with Member States' practices in the field of border management, while remaining within the framework of the Staff Regulations. The envisaged measures, especially those related to the arduous working conditions, while catering for specific situation of Frontex's standing corps, would be carefully weighed against the currently applicable system, particularly in view of their potential spill-over effect.

The internal coherence has the same high positive score across policy options for measures responding to **PD1.1**, except TA **visa policy**, where internal coherence is affected by the need to expand the legal basis of the new legislative act for measures proposed under **PO3**. On EUROSUR-related measures (**PD 1.2**), changes in EUROSUR's overall purpose mean that **PO3** has less external coherence than **PO2**, in particular for the much broader personal data processing and the expansion of EUROSUR to cover returns, which may clash with legislation in other areas.

In the **external dimension (PD1.3)** the external coherence with the factors outlined in Section 1.2 is the highest under **PO3**, which is proposing the most ambitious CSDP-related measures to strengthen cooperation with third countries. Similarly, with regard to cooperation with international organisations, the highest coherence is assured by the most ambitious measures, which are proposed under **PO2** (and also apply to **PO3**). On returns **(PD1.4)** the coherence across all POs is at the same level. This takes into account the close links with the existing return *acquis* but also the unknown factor in ensuring coherence with the recent proposals in the area of return.

The internal coherence is particularly relevant for **PD2.1** (**standing corps**) and **PD3.1 (training)**. PO3 scores highest for internal coherence for these, because it is instrumental in contributing to EIBM objectives. Regarding the standing corps, the strong links with PD3.1 and with PD1.1 (conditions of deployment and development of contingents) make coherence a decisive distinguishing criterion as compared to **PO2**, whereas in training, coherence, along with effectiveness, draw the distinction line with regard to **PO2**. The coherence of measures relevant for remaining PDs is mostly the same across the POs (i.e. slightly positive for **PD2.1 – TA employment conditions** and for **PD3.2 – controls of assurance** TA and positive for **PD3.2 – EIBM planning TA**), thus demonstrating that the measures proposed in response to these PDs provide necessary foundations for achieving more general objectives related to EIBM. Only for **PD2.2 (technical equipment**) is coherence slightly affected under **PO3**, due to the possible and not yet identified links with other policy areas, in particular defence.

## 8. PREFERRED MEASURES

Table 1 provides an overview of the preferred option per thematic area under each problem driver/problem. For more details see **Annex 9**.

For the purposes of this Impact Assessment, 'preferred measures' refers to the combination of measures that performs best against the assessment criteria **by thematic area**, rather than a single policy option applied uniformly across all areas. This reflects that the underlying problems, legal constraints and implementation feasibility differ across policy drivers. The cumulative impacts of this preferred combination are assessed in the impact analysis by tracing how that combination jointly contributes to the general and specific objectives. For this reason, their economic impacts are assessed together with their effectiveness, efficiency and coherence. Measures that entail higher costs may therefore still be selected where they provide additional operational capacity, greater long-term effectiveness or make the EBCG framework more coherent.

For two thematic areas under **PD1.1: border control** and the **fight against cross-border crime**, the selection of **PO1** is driven by the need to address persistent shortcomings in the current EBCG border management model (including fragmented operational practices, uneven Member State cooperation, and limited capacity to either host or use deployments of the standing corps). The measures concerning Frontex's role in countering cross-border crime under **PO1** make it possible to act on identified efficiency losses and missed opportunities, such as with regard to transmissions of operational personal data to Europol (without undermining the existing, strong data protection framework), without encroaching on Europol's mandate and exceeding the legal basis of the EBCG Regulation.

**PO2 provides the preferred mix of policy measures for emergencies and hybrid threats**. It enables Frontex to maximise the support it can provide to the Member States in emergency situations, without overstepping the boundaries of its legal basis and of the supporting competence of the EU in civil protection, under Articles 6 and 196 TFEU. The PO2 measures respect the principle of subsidiarity and avoid overlaps with mechanisms such as the Union Civil Protection Mechanism (UCPM).

For **visa policy**, the measures under **PO2** would maximise benefits to the EBCG without needing to modify the legal basis of the EBCG Regulation. The measures are moderate, but in line with the EBCG's ambitions for Frontex in visa policy. They are coherent with other proposed policy measures, by cementing Frontex's role as a central provider of trainings and specialisation, and enhancing its risk analysis capabilities and extending them to the visa policy area.

For **EUROSUR**, the preferred measures under **PO2** clarify various sources of legal uncertainty, with the intention of streamlining data sharing processes to enhance the Member States' operational cooperation. As such, **PO2** presents the preferred mix of measures as they provide effective remedies to existing issues, while presenting an appropriate degree of forward-looking ambition in full compliance with the applicable data protection rules without requiring an overhaul of EUROSUR's capabilities that would risk revolutionising its intended purpose for limited operational gains and at high economic cost.

For **Frontex's cooperation with third countries and CSDP missions**, **PO3** is the preferred option as it offers the most comprehensive set of measures, including those proposed under **PO1** and **PO2** cementing Frontex as the main partner for border management components of EU projects in third countries. **PO3** aligns with the priority of maximising the value of Frontex's support to Member States and pursuing the broadest possible uptake of EIBM, including cooperation on border management with third countries. Measures under **PO2** regarding Frontex's **cooperation with international organisations** grant Frontex the maximum possible flexibility to identify potential partners and establish constructive cooperation with them, without weakening existing structures for oversight or strategic steering.

**PO2** is the preferred set of measures regarding Frontex's role in **returns**. This set of measures offers the strongest overall performance across all criteria by addressing several existing issues while enabling Frontex to support the EU's ambitious policy on return. At the same time, these measures achieve these objectives in a way that is effective, proportional, and coherent with other objectives, such as the effective implementation of EIBM, the development of the standing corps, and the sustainable growth of Frontex. **PO2** would be much more efficient than **PO1**, by identifying shared needs among the Member States and providing EU-level tools and coordination mechanisms that could not be developed by individual Member States or national return actors. Connected to this, the measures in PO2 were also selected regarding **organisational governance**, to reflect the existing deficit in representation of return actors in Frontex's decision-making structures. At the same time, **PO2** avoids the risk of mixed effects under **PO3**, which by imposing the obligation to add return authorities as MB members could also make MB meetings more complex or potentially chaotic.

For the **standing corps' architecture, recruitment and distribution of resources**, **PO3** is the preferred set of measures. These measures plan the growth of the standing corps to a total of 30 000 in a way that is sustainable and coherent with operational realities and necessities, as well as political ambitions in remits such as return. While **PO1** also tries to achieve this by expanding the numbers of officers available for Frontex deployments, this option is the least cost-effective and would also require a growth pace that would be difficult to sustain for both Frontex and Member States, risking creating capability imbalances. Additionally, only **PO2** and **PO3** succeed in also addressing the need to maximise flexibility and interoperability in Joint Operations, and in promoting the uptake of EIBM as the 'common language' in return and border management across the EBCG, significantly increasing their effectiveness. This in turn also maximises the cost-effectiveness of the proposed measures. **PO3** would maximise the effectiveness of Frontex deployments. It also includes measures that link Frontex's expansion to its mandate, while the overall growth of the standing corps would be gradual, not risk draining the resources of the Member States, and establish important forward-looking components (such as a highly interoperable Category 5 reserve force and the infrastructure, expertise, and framework to train European border and coast guard officers to consistently high standards in line with EIBM). This set of measures also provides for a number of technical adjustments that ensures that Frontex can support this growth.

Regarding the **employment conditions of the standing corps**, **PO2** addresses shortcomings in the current employment framework that impair the functioning of the standing corps. While **PO1** introduces a new system for the deployment of the standing corps and related compensation framework, **PO2** scores higher in effectiveness by creating a system that would better align with the training and progression planned for standing corps officers. **PO2** is also perceived as more coherent with other adjacent measures, such as the measures affecting the architecture and recruitment of the standing corps (by, for example, enabling experience accumulation and mitigating turnover ratios among experienced officers by including the possibility to facilitate indefinite contracts after certain periods of service). This would also support the objectives related to making Frontex a provider of trainings for excellence in border management and return activities. All sets of policy measures are believed to coherently pursue the objectives of the EBCG Regulation and support the EBCG's needs and objectives, but **PO2** appears more efficient.

For **technical equipment and IT systems, PO2** is the preferred option. This is because **PO1** has a limited scope, as it focuses on providing legal clarity as regards IT systems, but **PO2** is significantly more effective, as it takes a comprehensive approach to tackling the interoperability, procurement, and logistics-related barriers that currently hamper the operational effectiveness of Frontex, more extensively addressing the identified problems. It enables Frontex to invest in advanced technologies to enhance its technical capabilities and ensure it provides to the Member States the support dictated by their operational needs, guaranteeing a high degree of preparedness even in unforeseen circumstances. Accordingly, these measures perform strongly in terms of effectiveness and coherence by calling for harmonised processes and EU-level coordination to identify and exploit synergies across the EBCG. PO2 thus strikes the best balance between ambition, feasibility, proportionality, and the ability to resolve existing issues and remain prepared to address future necessities.

For **standing corps' training**, **PO3** offers the most comprehensive and scalable training architecture, capable of supporting the expansion of the standing corps in line with the abovementioned relevant preferred policy measures. **PO3** has the structural improvement introduced under **PO1** and **PO2**, but also provides for the necessary training programme adaptations, capacity expansions, and strengthened delivery mechanisms required to train a much larger force and ensure interoperability across services and categories, therefore mutually complementing the measures concerning the new Category 5. **PO3** also scores highly on coherence due to its support of EU-level interoperability objectives while recognising, and relying upon, shared responsibilities between Frontex and the national authorities of

the EBCG.

For **EIBM strategic and integrated planning, PO2** is the preferred option due to its delivery of strong and sustainable improvements in planning coherence and strategic coordination, which are areas where deficiencies were identified. At the same time, it imposes minimal administrative burdens and avoids the legislative sensitivities associated with **PO3**. **PO2** does introduce additional administrative steps, but (i) they are proportional to the measures' success in reducing duplications, clarifying timelines, and ensuring better planning cohesion and (ii) they impose a less intrusive governance mechanism (with associated administrative burdens) than **PO3**. **PO2** also scores strongly on coherence by proposing a future-proof framework for integrated capability planning for the EBCG that is both more comprehensive than **PO1** and less administratively and politically burdensome than **PO3**.

For **quality assurance mechanisms**, **PO2** is the preferred option. It provides the strongest and most balanced framework by combining the broader Vulnerability Assessment scope with a structured, proportionate enforcement mechanism based on better use of vulnerability assessments and better framing the existing internal oversight instances. At the same time, it ensures their reinforcement and legal clarifications where evidence suggests that the relevant provisions in the Regulation are incomplete or unclear, and therefore cause bureaucratic inefficiencies (e.g.: absence of an Article on the Frontex Serious Incident Reporting mechanism, lack of clarity on mandate to process complaints). **PO2** scores highly on effectiveness not only by targeting situational awareness, but also by introducing credible incentives to drive improvements in Member States' compliance. These measures are also efficient, as they involve minimal costs while delivering greater predictability, fewer repeated follow-ups, and thus lowering administrative burdens, and reduced duplications with the Vulnerability Assessment cycle. **PO2** also scores highly on coherence, aligning closely with the existing Schengen evaluation and EU funding oversight mechanisms. **PO2** has all the benefits achieved by the measures in **PO1**, and adds the structured enforcement mechanisms necessary to reduce current vulnerabilities and improve the reliability of the system as a whole.

*Table 2 – Overview of the preferred option under each thematic area and problem/driver*

| Thematic area | Problem/Driver | Option 1 | Option 2 | Option 3 |
|---|---|---|---|---|
| Border management | Problem 1, Driver 2.1.1.1 | X | 2=1 | |
| • Countering cross-border crime | Problem 1, Driver 2.1.1.1 | X | 2=1 | |
| • Emergencies and hybrid threats | Problem 1, Driver 2.1.1.1 | | X | |
| • Visa policy | Problem 1, Driver 2.1.1.1 | | X | |
| EUROSUR | Problem 1, Driver 2.1.1.2 | | X | |
| Cooperation with third countries and CSDP missions | Problem 1, Driver 2.1.1.3 | | | X |
| Cooperation with international organisations | Problem 1, Driver 2.1.1.3 | | X | 2=3 |
| Returns | Problem 1, Driver 2.1.1.4 | | X | |
| Organisational governance in return | *Problem 1, Driver 2.1.1.4* | | X | |
| Standing corps size, recruitment and distribution of resources | Problem 2, Driver 2.1.2.1 | | | X |
| Employment conditions of the standing corps | Problem 2, Driver 2.1.2.1 | | X | 2=3 |
| Technical equipment and IT systems | Problem 2, Driver 2.1.2.2 | | X | |
| Standing corps training | Problem 3, Driver 2.1.3.1 | | | X |
| EIBM strategic and integrated planning | Problem 3, Driver 2.1.3.2 | | X | |
| Quality assurance | Problem 3, Driver 2.1.3.2 | | X | 3=2 |

### 8.1 Regulatory Fitness and Performance Programme (simplification and improved efficiency)

In compliance with the Commission's Regulatory Fitness and Performance Programme, all initiatives aimed at revising existing EU legislation should seek to simplify and reduce the administrative burden on Member States.

The study accompanying the Impact Assessment reveals that the preferred options for most thematic areas would require stronger involvement of the Member States in order to reinforce the EBDG's capacities to respond to the challenges related to border management and effective returns. This greater involvement would in practice increase the administrative burden on Member States, due to both the new (or more explicit) obligations on the Member States in the EBCG Regulation and the decisions that the Frontex Management Board or Executive Director adopt to support the implementation of EIBM objectives. However, this increased burden (related in particular to stronger coordination of planning, acquisitions of technical equipment, information sharing, trainings) would be offset by the positive impact on the overall security in the Schengen area, thanks to more efficient border management and returns. The measures accompanying the increase of the standing corps size (in particular the modified training architecture and revolutionised financial support) should significantly alleviate the burdens related to the recruitment and upkeep of the new Category 5.

The regulatory burden related to the preferred options would vary per thematic area, but in general would be of limited scope, as many of the proposed measures aim to remove gaps and clarify ambiguities. The new mechanisms would build on the existing structures, in particular for training and returns.

### 8.2 Application of the 'one in, one out' approach

This initiative will entail neither administrative costs nor savings for the private sector. It will not incur any costs for the public. However, this initiative will improve the level of security and protection of citizens in the EU. Adjustment costs will mostly concern public authorities.

## 9. HOW WILL ACTUAL IMPACTS BE MONITORED AND EVALUATED?

The Commission will monitor and evaluate the actual impacts of this initiative through the existing mechanisms. To avoid duplication of efforts, the monitoring would rely on indicators used in Frontex Strategic Planning Documents and Annual Activity Reports, as being relevant to track performance. This is complemented by new indicators, which will require additional data collection.

The proposed indicators are primarily quantitative in nature and focus predominantly on outputs. While they provide an initial framework for monitoring progress, they do not yet capture the full breadth of outcomes that preferred policy measures aim to achieve. Additional and more specific elements of the monitoring and evaluation framework, particularly those related to longer-term results, qualitative content and shifts in behaviours or systems, will need to be developed and refined progressively once each selected policy measure is operationalised in further detail.

In addition, the current evaluation mechanism established in the EBCG Regulation (Article 121 on the 2024 evaluation of the EBCG Regulation and Article 59 on the review of the standing corps), as well as reporting obligations to the European Commission, European Parliament, Council of the EU, and to the Management Board will remain in place. Frontex Management Board will also continue to provide a forum to evaluate the different measures related to these proposed policy options.

**Annex 13** provides a Monitoring and Evaluation framework for the preferred policy measures, with a set of indicators per thematic area.

# ANNEX 1: PROCEDURAL INFORMATION

## 1. Lead DG, DECIDE Planning / Commission Work Programme references

DG Migration and Home Affairs (DG HOME) is the lead DG. The agenda planning (Decide) reference assigned to the evaluation and impact assessment is PLAN/2025/801. This initiative is part of the Commission Work Programme of 2026.

## 2. Organisation and timing

On 24 January 2025 DG HOME published a call for service for carrying out an external study to support the evaluation of the revision of the Regulation (EU) 2019/1896 on the European Border and Coast Guard an impact assessment for a legislative proposal[81]. The selected tenderer – ICF – carried out a study between 2 April 2025 and [2 February 2026]. The reports issued by the contractor (an inception report, two interim reports and a final report) were designed to feed into the Commission's impact assessment work. The contractor organised several meetings to discuss the problem definition, the objectives to be achieved and to develop and evaluate the policy options.

The Interservice Steering Group was set up in June 2025 and is chaired by SG. It assists DG HOME in the development of the impact assessment and the proposal. The following DGs are part of the steering group: BUDG, COMM, DEFIS, ECHO, EEAS, EMPL, ENEST, ESTAT, GROW, HR, IAS, INTPA, JRC-ISPRA, JRC, JUST, MARE, MENA, MOVE, OLAF, TAXUD.

The steering group members were given the opportunity to comment in writing on all the contractor's outputs.

The steering group was convened 4 times and reviewed and approved in writing the following documents: the questionnaires for the stakeholders' consultation, call for evidence; public consultations questionnaire, Commission's Impact Assessment Report (i.e. this document).

- 11 June 2025 – kick-off meeting
- July 2025 – the steering group commented in written consultations on the questionnaire for public consultations and the draft first interim report
- 15 October 2025 – the second interim report was sent to the Commission.
- 15 December 2025 – the contractor presented the draft final report and the preferred policy option and its impacts were discussed. There was also an update on the public consultation process and discussions were held with stakeholders.
- 10 February 2026 – presentation and discussion on the draft Impact Assessment.

The steering group also met bilaterally with DGs to address specific issues of interest, in particular with DG HR, DG JUST.

DG HOME shared with ICF all the comments the DGs made and considered all the comments as

[81] The call for service was issued via framework contract HOME-2024-BMVI-TF2-FW-EVA1-4023. Four contractors submitted an offer. The evaluation committee considered a number of criteria, namely: compliance with the technical specifications described in the terms of reference; demonstrated understanding of the background of the programme, policy or legislation; the quality of the proposed methodology; and the quality of the proposed team and organisation of work; quality control measures. The Commission awarded the contract to ICF.

regards the draft impact assessment.

## 3. Consultation of the Regulatory Scrutiny Board

On 25 February 2026, DG HOME submitted the draft impact assessment to the Regulatory Scrutiny Board and the Board meeting took place on 25 March 2026. On 27 March 2026 the Board issued a positive opinion with reservations. The Board's recommendations have been addressed as shown in the table below.

| Regulatory Scrutiny Board recommendation | Changes introduced in the revised impact assessment report |
|---|---|
| **1. Better describe the policy measures to allow a clear assessment of their feasibility, impacts, potential to achieve the objectives, and consequences.** | The presentation of the policy measures has been strengthened by setting them out more systematically and with greater detail.<br><br>Section 5 now allows a clearer assessment of measures related to (i) working arrangements in the context of external dimension, (ii) employment conditions and the definition of the place of employment, (iii) safeguards and oversight mechanisms in the return framework, (iv) standing corps architecture, and (v) division of responsibilities within the EBCG. This makes it easier to understand their scope and practical implementation, and provides a firmer basis for assessing their feasibility, likely impacts, contribution to the objectives, and associated trade-offs. |
| **2. Clarify fundamental rights implications of each policy measure, including collection of new types of personal data and social media monitoring.** | The fundamental rights implications of the relevant policy measures were clarified. The report now specifies that any social media monitoring by Frontex would be subject to a strict and limited approach, solely for the specific purpose of supporting risk analysis through the collection of aggregated and anonymised data. This would not entail the collection or storage of personal data.<br><br>The data protection implications of the EUROSUR policy options are also presented more comprehensively in Section 6. The potential impacts on fundamental rights (also with regard to returns) have also now been assessed in more detail throughout the report. |
| **3. Explain how the proposal relates to the Staff Regulations, in particular with regard to the measures concerning the standing corps.** | The analysis of coherence between the proposed measures on the standing corps and the Staff Regulations was strengthened in Section 7.2. The revised report clarifies that the measures under the preferred options remain within the Staff Regulations framework.<br><br>The description of problems arising from the application of the Staff Regulations and their implementing rules to Category 1 operational staff were expanded and clarified in Annex 5. The policy measures under PO1 and PO2 on employment conditions were revised to better reflect the actual scope of the proposed changes.<br><br>By contrast, the PO3 measures on employment conditions were moved to the discarded measures in Annex 12 due to divergence from the Staff Regulations and potential spillover effects. |
| **4. Strengthen analysis of costs, cost-savings and benefits, with clearer assumptions and more granular evidence.** | The analysis of costs, cost-savings and benefits was strengthened in Section 6.1 on economic impacts, with additional rationale transferred from Annex 11 on cost assessment.<br><br>The revised report provides clearer explanations of the underlying assumptions, as well as of the uncertainties and limitations affecting the analysis. It also highlights the limits to the quantification of economic impacts for stakeholders other than Frontex. In addition, the one-off and recurrent costs for Frontex were added in Annex 3, in |

| | |
|---|---|
| | line with Annex 11.<br><br>Finally, the concept of the deployment system was updated to reflect the approach whereby, as a general rule, the place of employment is also the place of deployment, together with the relevant allowances. The related costs and savings were further explained in Annex 11 and Section 6. |
| **5. Improve readability of the report and include visual aids.** | Overall readability of the report was improved, in particular in the sections presenting and assessing the policy measures. Targeted drafting improvements were introduced across the report in order to make the structure clearer and the analysis easier to follow.<br><br>The revised report incorporates visual aids, including diagrams, tables and infographics to facilitate the presentation of complex information. A diagram was added to the introductory section to illustrate Frontex's role within the European Integrated Border Management (EIBM), including its links and coordination with other EU agencies and the wider EIBM architecture.<br><br>An overview table of the EIBM components was also added to provide a consolidated presentation of the components of EIBM. These changes make complex information more accessible for all stakeholders. |

## 4. Evidence, sources and quality

### 4.1 External contractor

An external contractor was commissioned to carry out a preparatory study to collect the evidence necessary for the Commission's impact assessment. The final report in the study was submitted on 2 February 2026.

During the work on the study, the contractor engaged with stakeholders in the following manner:

- Surveys and interviews:
  - The **standing corps survey** was launched on 16 June and was closed on 30 June. The survey collected 433 replies.
  - The **national authorities survey** was launched on 25 June and concluded on 10 October 2025. The survey gathered 48 replies from 24 EU Member States and 3 Schengen associated countries.
  - 140 semi-structured interviews were conducted with key stakeholders at the international, EU, and national levels. Interviews were conducted both online and in-person. Online interviews sometimes gathered more than one participant or authority.
- A set of **field visits** were conducted in selected Member States (Bulgaria, Finland, Spain and Italy) to enhance the study team's understanding of challenges related to the implementation of EIBM under the EBCG Regulation and to gather forward-looking insights for assessing different policy options and initiatives. The visits covered a number of Frontex's and Member States' operational activities and included face-to-face interviews with relevant stakeholders. The feedback collected informed the problem definition, the development and assessment of policy options, and the preparation of thematic case studies. The findings were then used to inform a set of thematic case studies.
- **Workshops**
  - The **first expert workshop** was held online on 23 May 2025. Experts undertook an initial assessment of policy measures' descriptions, assumptions, and details. Key considerations were briefly presented in the workshop, with detailed feedback on each

policy measure provided later in writing.
    - The **second expert workshop** was held online on 24 July 2025. The workshop gave the opportunity to discuss the draft policy options. Ahead of the workshop, experts' inputs on the problem definition and draft policy options were collected, with the aim to focus the discussion on specific elements that warranted specific discussions.
    - The **third expert workshop** was held on 20 October 2025. During the workshop, experts provided feedback on the proposed policy options and measures and the rationale for discarding some policy measures.
- **Thematic case studies**: Four thematic case studies were drafted, which provided a deeper understanding of the key challenges and feasibility of potential policy options by conducting an in-depth analysis on specific angles of the key themes. The thematic focus of the four case studies (CS) was as follows.
    - CS1: Standing corps' capability development
    - CS2: State of the Art Technical capabilities
    - CS3: Operational concept and Chain of Command
    - CS4: Returns and International Cooperation

### 4.2 COMMISSION own initiatives

DG HOME also organised two technical meetings:

- **Schengen Border Code Committee** – 6 June 2025 – with a focus on possible changes in the mandate of Frontex;
- **EBCG expert group** – 9 October 2025 – to discuss the standing corps and reinforcement of technical capabilities.

Both meetings gathered representatives of the Member States representing different authorities. Representatives from the European Parliament's Committee on Civil Liberties, Justice and Home Affairs (LIBE committee) and from Frontex were also invited.

### 4.3 FRONTEX

- ICF carried out a number of interviews with FRONTEX senior management and relevant units for the purpose of the study.
- The Frontex executive director prepared a White Paper outlining some ideas for the future reinforcement of Frontex which was presented at the June meeting of the management board.
- On 22 July 2025 the Frontex executive board discussed the next steps.
- On 17 August 2025, Frontex distributed another discussion paper 'The future of Frontex: long-term priorities for the EIBM and the revision of the EBCG Regulation'. The document outlined the three areas of possible intervention and provided specific questions for each of them on: (i) capabilities (the standing corps, technical equipment and training); (ii) third country engagement (operational support, strategic level and capacity building) and (iii) returns (future role and functions).
- The Frontex management board discussed the future of Frontex, including the revision of the EBCG Regulation, at the management board meeting of 24-25 September 2025 as well as at the extraordinary meeting of the management board on 20 October 2025. The main focus of discussions was on capabilities, third country engagement and returns. Following the 107$^{th}$ meeting in November 2025, the Management Board endorsed the summary of these discussions.

### 4.4. COUNCIL

There were preliminary exchanges of views with the Member States at different levels in 2025 and

2026:

- 16 April 2025– Frontiers WP (general discussion)
- 21 May 2025 - SCIFA (general discussion)
- 16 September 2025 - Senior Officials Meeting (general discussion)
- 30 September 2025 – JHA Counsellors (preparation for the discussion in the Council)
- 14 October 2025 – Schengen Council
- 5 November 2025 – Frontiers WP (continuation of discussion)
- 2 December 2025 – Frontiers WP (finalisation of discussions)
- 10 December 2025 – JHA Counsellors
- 19 December 2025 – COREPER approved a summary report prepared by the Danish Presidency
- 6-7 May 2026 – SCIFA (continuation of discussion)
- 8-9 July 2026 - SCIFA (finalisation of discussions).

### 4.5. EUROPEAN Parliament

The first exchange of views with EP took place in April, at the Schengen Scrutiny Working Group of the European Parliament's Committee on Civil Liberties, Justice and Home Affairs (LIBE committee). DG HOME presented an update to the Working Group on 16 October 2025. DG HOME provided a further update, followed by another exchange of views, on 11 June 2026. Frontex's future mandate was also discussed at the event on 2 July 2026 launching a study on Frontex's future, which was commissioned by the European Greens.

### 4.6. Other sources

The impact assessment also builds on the Commission's evaluation of Regulation (EU) 2019/1896[82], internal analyses, and supporting reports and studies produced by the Commission and relevant EU bodies, as well as information provided by Frontex and Member States.

The evidence base is complemented by stakeholder input gathered through:

- **Call for evidence** published by DG HOME on the Commission's 'Have your say' webpage on 31 July 2025 until 11 September 2025.

- **Public consultation** from 21 August 2025 to 27 November 2025, which was also published on 'Have your say' webpage (for more details, see Annex 2).

[82] See COM(2024) 75 final. The Commission carried out the evaluation and review between May 2022 and October 2023, based on a broad consultation exercise involving Member States' authorities, the European Parliament, the Council, Frontex itself, and relevant EU agencies, including the Fundamental Rights Agency. This work has also been supported by an external study.

# ANNEX 2: STAKEHOLDER CONSULTATION (SYNOPSIS REPORT)

This Annex presents the synopsis report of the consultation activities undertaken for the evaluation and impact assessment of the proposal amending the European Border and Coast Guard Regulation.

## 1. CONSULTATION ON THE ROADMAP/INCEPTION IMPACT ASSESSMENT

### 1.1 Introduction

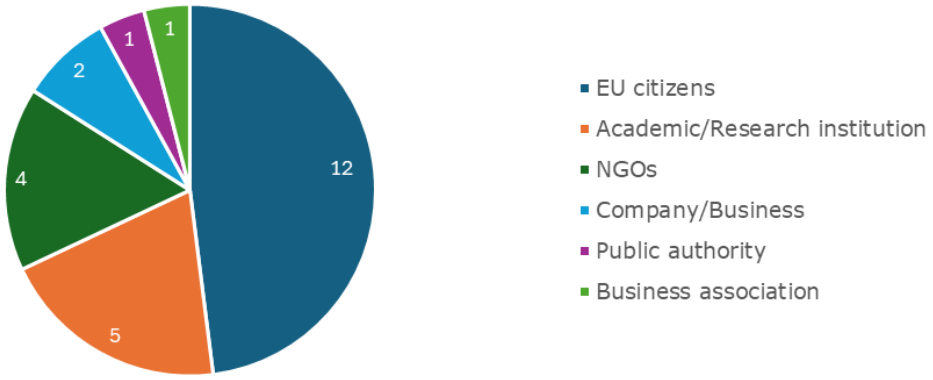
The **Call for Evidence** was launched on the European Commission's website ('Have Your Say' Portal) on 31 July and closed on 11 September 202583. This Annex provides an overview of respondents' profile and their views.

Some respondents attached position papers, academic articles, and reports to support their submissions. This Annex summarises the main points raised in these materials. In some cases, the annexes included extensive public reports or detailed academic studies. While this Annex provides an overview of their key messages, specific insights from these sources have been integrated into the main body of the Second Interim Report as part of the evidence base underpinning the findings, where relevant.

### 1.2 Respondents' profile

The Call for Evidence gathered **25** replies from a diverse range of stakeholders: EU citizens (12), academic and research institutions (5)[84], NGOs (4)[85], companies (2), one business association, and one public authority (see figure below).

***Respondents' profile by- stakeholder type***

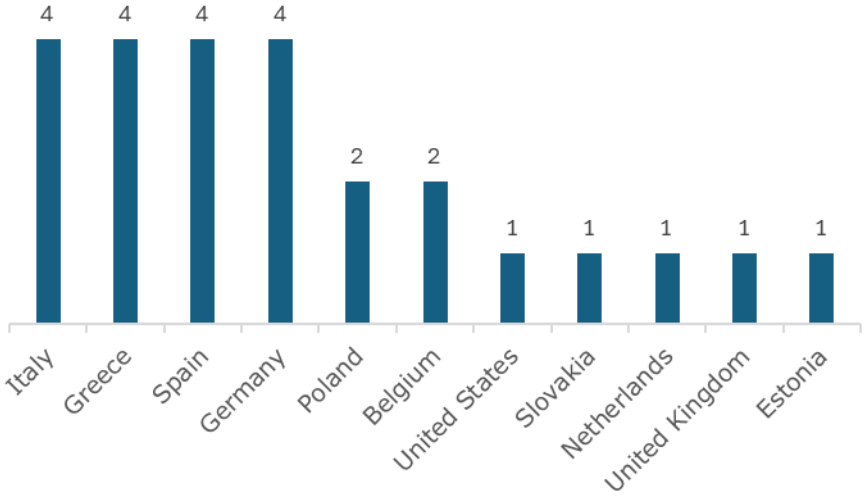



*Source: Produced by ICF*

Contributions came from nine Member States (Belgium, Germany, Estonia, Greece, Spain, Italy, the Netherlands, Poland and Slovakia) and from the US[86] and the UK[87].

[83] European Border and Coast Guard – update of EU rules
[84] One academic submitted three different replies to the call for evidence, because their attached documents exceeded the size limit for a single response. Another respondent (SHARED project) attached a contribution which is the result of a collaboration of three different universities.
[85] Among the NGOs that responded to the call for evidence, there was one reply from a coalition representing six NGOs.
[86] The 'Entrust' company
[87] Academic/research institution: University of Westminster

***Respondents' profile - geographical distribution***




*Source: Produced by ICF*

### 1.3 Views of respondents

In response to the call for evidence, respondents expressed a wide range of views, often reflecting broader debates about migration, border management, and the role of the European Border and Coast Guard (EBCG), including Frontex. Other respondents focused on specific issues involving Frontex's mandate, its activities, and the EBCG Regulation itself.

Some individuals, NGOs and academics criticised stronger border enforcement, pointing to concerns about pushbacks, asylum rights, transparency, accountability and the risk that expanding Frontex would worsen fundamental rights violations. Several people argued instead for more humane migration policies, stronger oversight, and investment in root causes abroad.

Others supported a stronger Frontex role, stricter external border controls, more effective returns, and additional operational support, especially in frontline regions. Further contributions from public and private actors called for more tailored regional support, better cooperation with third countries, stronger training and safeguards, and more flexible, innovation-friendly rules and technologies for EU border management.

## 2. CONSULTATION STRATEGY

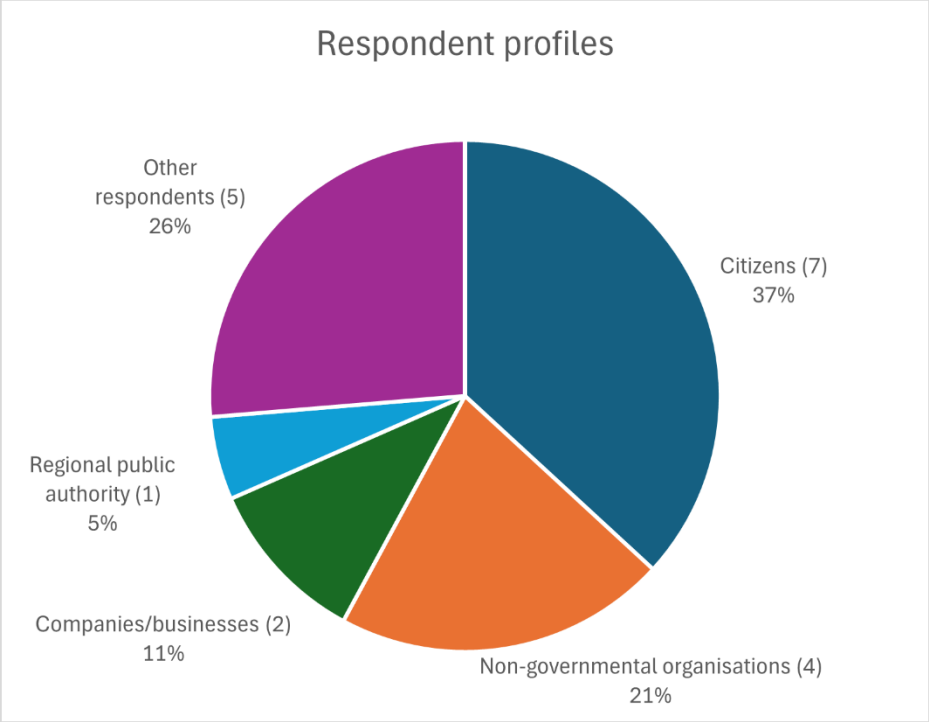
### 2.1. Public consultation

The Commission carried out an **open public consultation** targeting the general public with the aim of collecting information, evidence, and views on the issues at stake and to feed into the evaluation questions. The questionnaire was available in all official languages of the EU institutions[88] and remained open on the Commission's public consultation website from 21 August 2025 to 27 November 2025.

Of the 19 contributions received, 7 (37%) were submitted by EU citizens, followed by 4 (21%) non-governmental organisations, 2 (11%) companies/businesses and 1 (5%) regional public authority. There were 5 (26%) contributions from other respondents, which included one NGOs network, two international organisations, one federation, and Frontex Consultative Forum, see Figure 1**.**

[88] Except Gaelic.

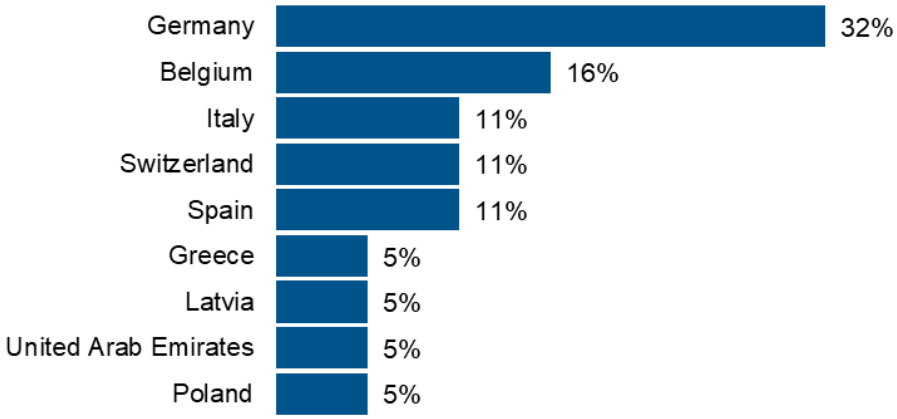
**Figure 1: Public consultation responses by type of respondent**




Source: European Commission[89]

A third of responses came from Germany (6 or 32%). The second largest number of contributions came from Belgium (3 or 16%), followed by Italy (2 or 11%), Switzerland (2 or 11%) and Spain (2 or 11%,). This was followed by Greece (1 or 5%), Latvia (1 or 5%), United Arab Emirates (1 or 5%) and Poland (1 or 5%), see Figure 2.

**Figure 2: Responses to public consultation by country**




Source: European Commission[90].

## 2.2. Online survey by ICF

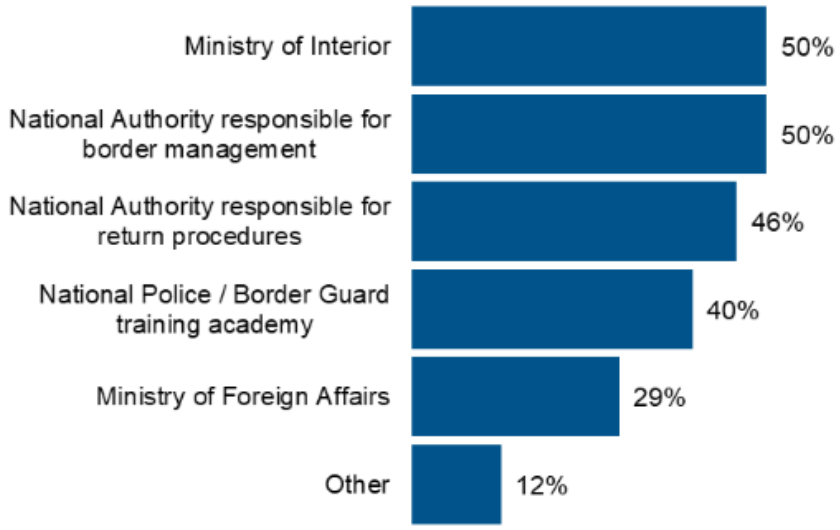
The online survey targeted national authorities form EU Member States and Schengen Associated

[89] European Commission, Have your Say - European Border and Coast Guard – update of EU rules
[90] European Commission, Have your Say - European Border and Coast Guard – update of EU rules

countries. It opened on 25 June 2025 and concluded on 10 October 202, and was then distributed to national authorities via email, through Permanent Representations.

The survey focused on gathering the views and insights of national authorities on the following issues: standing corps; training concept; Frontex mandate, governance, and oversight; returns; standing corps support to EU visa policy; situational awareness capabilities; state-of-the-art technology and equipment and national training capabilities and needs.

The survey gathered 48 replies from 24 EU Member States and 3 Schengen associated countries. Some countries submitted a single consolidated reply reflecting the views of all relevant national authorities, while others provided multiple replies from different authorities. The type of national institutions replying to the survey is showcased in the graph below.




## 2.3. Stakeholder interviews

The contractor carried out 140 semi-structured **interviews** with key stakeholders at the international, EU, and national levels. Stakeholder consultations targeted representatives from Frontex, standing corps personnel, European Commission, other EU agencies and bodies relating to EBCG operations, Frontex Consultative Forum members and Member States' authorities. Interviews were conducted both online and in-person, with the online interviews sometimes gathering more than one participant or authority. The table below (Table 1) provides an overview of conducted interviews.

**Table 1: Overview of stakeholder interviews conducted**

| Stakeholder type | Details |
|---|---|
| **Frontex** | • Strategy, Governance and External Relations Division (STRAT) (3)<br>• Human Capital Division (PERSONNEL) (2)<br>• Capability Transformation Division (TRANSFORM) (2)<br>• Equipment and Logistics Division (EQUIP)<br>• EIBM Intelligence Division (INTEL) (3) |

| | |
|---|---|
| | • Human Resources and Corporate Services Division (HRS) (3)<br>• Operational Management Division (OMD) (2)<br>• Operational Planning Division (OPD) (3)<br>• Operational Support Division (OSD) (3)<br>• Return Division (RET)<br>• Executive Director<br>• Data Protection Officer<br>• Management Board Secretariat<br>• ETIAS Central Unit Division<br>• Deputy Executive Director for Operations<br>• Fundamental Rights Officer (FRO) and Deputy FRO<br>• EIBM Intelligence Division (Analysis Unit : Travel Flow Analysis Sector) |
| **Standing corps** | • Frontex Contingent Commanders (4)<br>• Deputy Contingent Commander (2)<br>• Fundamental Rights Monitors (2)<br>• Liaison Officers in Third Country (2)<br>• Cross-border Crime Detection Officers (2)<br>• Return Contingents (3)<br>• Cross-border crime detection officers (3)<br>• Debriefing Officers (5)<br>• Section Leaders (2)<br>• Advanced Level Document Officer |
| **European Commission** | • DG MENA A2<br>• DG INTPA A2<br>• DG INTPA A3<br>• DG INTPA G6<br>• DG HOME A3<br>• DG HOME B2<br>• DG HOME B4 |

| | |
|---|---|
| | • DG HOME C1<br>• DG HOME C4<br>• DG HOME C5<br>• DG HOME B1<br>• DG HOME E1<br>• DG HOME F2<br>• DG ENEST B1<br>• DG MOVE<br>• DG JUST (2)<br>• DG HR (3)<br>• Paymaster Office (PMO)/ Office for administration and payment of individual entitlements<br>• Secretary General<br>• EU Return Coordinator<br>• DG HOME Director General<br>• DG BUDG |
| **Frontex Consultative Forum members** | • United Nations High Commissioner for Refugees (UNHCR)<br>• Fundamental Rights Agency (FRA)<br>• Office of the United Nations High Commissioner for Human Rights Regional Office for Europe (OHCHR)<br>• European Union Agency for Asylum (EUAA)<br>• Council of Bars and Law Societies of Europe (CBBE)<br>• International Organisation for Migration (IOM)<br>• Save the Children<br>• OSCE Office for Democratic Institutions and Human Rights (ODHIR) |
| **Other EU agencies and bodies** | • CEPOL<br>• EEAS (2)<br>• EFCA<br>• Eurojust<br>• EMSA<br>• EUDPS |

| | |
|---|---|
| | • Europol<br>• SatCen<br>• EU Ombudsman |
| **Member States' authorities** | • France (Ministry of Interior (2), Border management/return authority)<br>• Estonia (Border management authority)<br>• Germany (Border management authority, Return authority)<br>• Croatia (Ministry of Interior, Border management/return authority)<br>• Hungary (Ministry of Interior, Border management authority)<br>• Czech Republic (Border management authority)<br>• Romania (Border management authority)<br>• Sweden (Ministry of Interior, Border management authority)<br>• Malta (Border management authority)<br>• Netherlands (Return authority)<br>• Italy (Ministry of Interior (3); Border management/return authority (5))<br>• Bulgaria (Ministry of Interior, Ministry of Foreign Affairs, Border management/return authority)<br>• Spain (Border management authorities (3))<br>• Finland (Ministry of Interior, Border management/return authorities (5), Border and coast guard academy)<br>• Greece (Hellenic Coast Guard)<br>• Czech Republic (Return authority) |

## 3. RESULTS OF THE CONSULTATION ACTIVITIES

### 3.1 Public consultation

Respondents identified search and rescue operations, consistent standards across the EU, and cooperation with EU and international partners among the main areas for further strengthening. Respondents also supported reinforcing mechanisms to detect and address fundamental rights violations, including stronger fundamental rights complaints mechanisms and oversight.

Training and harmonisation were generally considered to have positive impacts, particularly through common standards and training for national border and coast guard officers.

Concerns were raised regarding Frontex's role in returns and third-country deployments, as well as the use of emerging technologies. The concerns emphasised the need for clear responsibilities, accountability and compliance with fundamental rights and data protection requirements.

Views on expanding the standing corps and Frontex's technical capabilities were mixed.

### 3.2 Online survey by ICF

The ICF survey identified improvements associated with Frontex's new operational command structure, including a clearer chain of command and improved standing corps coordination. At the same time, administrative burdens, duplication and differences in procedures and standards across countries and missions were identified as factors affecting operational efficiency. Respondents identified improvements to reimbursement arrangements and financial incentives as potential measures to facilitate standing corps deployment.

Training was identified as a key area for further development, particularly regarding document checks, returns, identification of vulnerable persons and technological proficiency. National training authorities highlighted common EU-level standards as a means of improving operational coherence, including in the application of EU and international law, screening procedures and shared EU systems such as EUROSUR, JORA, and IRMA. The new standing corps category for emergency responses was also identified as a potential source of added value for Member States.

### 3.3 Stakeholders interviews

Stakeholders identified operational challenges affecting Frontex deployments, including difficulties integrating EU-level officers into national operations and inefficiencies linked to the deployment requirements for EU co-financed assets. They also highlighted gaps in preparedness, including the absence of vulnerability assessments for EU candidate countries, and identified a Deployment Handbook as a potential means of improving coherence with national practices. Stakeholders emphasised that Frontex should complement rather than duplicate national capabilities. The potential expansion of technical equipment was considered to have mixed coherence in light of the associated financial, logistical and support requirements.

# ANNEX 3: WHO IS AFFECTED AND HOW?

## 1. PRACTICAL IMPLICATIONS OF THE INITIATIVE

The initiative concerns the revision of the Regulation (EU) 2019/1896 on the EBCG, with the objective of reinforcing the mandate, capacities, and operational effectiveness of the EBCG, including its standing corps, operational support functions, and cooperation with Member States and third countries.

The initiative therefore has the capacity to affect the following stakeholders:

- Member States / Schengen associated countries (public authorities responsible for border management and coast guard, police and other law enforcement authorities, authorities and services responsible for return and visa, migration and asylum authorities);
- European Border and Coast Guard Agency (Frontex) and other relevant EU agencies (in particular Europol);
- Frontex management board;
- EU citizens and third-country nationals.

## 2. SUMMARY OF COSTS AND BENEFITS

***Table 1 - Overview of benefits – preferred option***

| Direct benefits and impacts | Group affected / additional comments |
|---|---|
| Expected improvements in operational efficiency and effectiveness in border management | Border and coast guard authorities / EU citizens / consulates / third country nationals |
| Expected improvements in combating cross-border crime and smuggling | Border and coast guard authorities / national law enforcement authorities / Frontex / Europol / Eurojust / third country nationals / EU citizens |
| Expected improvements in addressing risks related to issuing of visa and verification of documents | Border and coast guards authorities / visa authorities (consulates in particular) / third-country nationals |
| More comprehensive situational awareness: Enhanced data sharing in EUROSUR may lead to swifter decision-making and resource allocation | Border and coast guard authorities / Frontex |
| Enhanced cooperation in external dimension | Border and coast guard authorities / return authorities / Frontex / EU delegations / consulates/third-country nationals |
| Enhanced returns | Authorities and services responsible for returns at different stages / Frontex / third country nationals |
| Increased standing corps composed of better trained staff and more diversified | Border and coast guard authorities /return authorities and services / consulates / Frontex |

| Direct benefits and impacts | Group affected / additional comments |
|---|---|
| Employment conditions adjusted to the specificity of the tasks | Standing corps / Frontex |
| Expected expansion of responsibilities in supporting Member States with regard to returns, visa policy, pooling technical equipment and cooperation with third countries; | Frontex |
| Modernised training architecture | Frontex EBCG academy and national training authorities |
| **Indirect benefits and impacts** | |
| Anticipated improvements in security and internal security | EU citizens |
| Potential for removing persistent controls at internal borders thanks to improvement of controls at external borders | EU citizens |
| Increased trust in institutions and EU policies | EU citizens |
| Adequate oversight as regards activities involving Frontex | EU citizens / third country nationals |

**Summary of costs and benefits**

As a tool for assessing the costs and benefits, the Commission used the relevant parts of the Commission's Better Regulation Guidelines' Toolbox.

***Table 2 - Cost overview according to the standards set out in the Better Regulation Guidelines***

| Overview of Costs (2028-2034) - Preferred Option (in m EUR) | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | Citizens / consumers | | Businesses | | Administrations | |
| | | One-off | Recurrent | One-off | Recurrent | One-off | Recurrent |
| Staffing costs (including HQ staff) | Direct costs | Not applicable | | Not applicable | | | 3 949 |
| EBCG standing corps - deployment costs | Direct costs | Not applicable | | Not applicable | | | 1 517 |
| EBCG standing corps - training costs | Direct costs | Not applicable | | Not applicable | | | 97 |
| EBCG standing corps - subsidies* | Direct costs | Not applicable | | Not applicable | | 10 | 1 059 |
| Technical equipment | Direct costs | Not applicable | | Not applicable | | | 1 704 |
| Return activities | Direct costs | Not applicable | | Not applicable | | | 1 143 |
| Other operational expenditure | Direct costs | Not applicable | | Not applicable | | | 954 |
| | Direct regulatory fees and charges | Not applicable | | | | | |
| | Direct enforcement costs | Not applicable | | | | | |
| | Indirect costs | Not estimated | | | | | |

* The costs calculation takes into account a one-off payment (yearly) for Category 1 Standing Corps Officers under Article 61(c).

An overview on the costs' calculation is given in Annex 11 (costs assessment).

All one-off and recurrent costs are implementation costs. No regulatory charges, hassle costs, administrative costs or indirect costs were identified and therefore are not quantified.

No costs stemming from new or removed administrative burdens (i.e. from the application of the 'one in, one out' approach) have been identified.

***Table 3 - Overview of relevant UN Sustainable Development Goals***

| Sustainable Development Goals | Expected progress towards the goal |
|---|---|
| No 3: Good health and well-being | More efficient border controls based on well-trained standing corps and more efficient returns are expected to enhance access to healthcare for irregular migrants and returnees.<br><br>Better and more uniform training in all aspects of border management and return will also lead to a greater degree of care for individuals, including with regard to the appropriate support to unaccompanied minors, the provision of services to persons in vulnerable situations, and the identification of victims of trafficking, among others.<br><br>Improved data sharing among Member States may facilitate timely interventions, including search and rescue operations, and thus prompter access to medical services. |
| No 10: Reduced inequalities | The modified training framework is expected to ensure a more uniform application of EIBM across the Member States and cover all aspects of border management, contributing to responsible and well-managed migration policies, based on the safe and effective management of the external borders. This will also lead to more equitable treatment of migrants across Member States. |
| No 16: Peace, justice, and strong institutions | The initiative is expected to strengthen the rule of law and enhance security within the EU. Ensuring that suggested policy measures feature adequate oversight and governance components will further strengthen Frontex's accountability and stakeholders' access to justice.<br><br>Clarifying the role of Frontex in the fight against cross-border crime will enhance Frontex's contribution in the fight against transnational crime, contributing to overall EU efforts on this front.<br><br>Improved coordination among Member States may lead to more effective management of migration related challenges, potentially reducing public distrust towards institutions. |

# ANNEX 4: ANALYTICAL METHODS

## 1. Methodology

The Commission's impact assessment methodology served to structure and guide the analyses carried out by in the feasibility study[91]. The work focused on assessing the feasibility and impacts of policy options.

The methodological approach derived from the analysis of the list of guiding questions as per the Better Regulation Guidelines by the contractor. During the study these questions were categorised into a set of thematic areas.

Based on the inputs provided by the contractor, DG HOME further refined the problems, the thematic areas and the policy options.

### 1.1. Data collection and analysis phase

The data collection and analysis phase comprised a set of tasks and sub-tasks, which are outlined below.

**Part 1**: The inception phase consisted of **a preliminary identification of policy objectives and of policy options**. Identifying these elements formed a critical foundation of the study, as they ensured (i) the overall coherence of the initiative, (ii) clear links between the problem drivers and the proposed policy options, and (iii) clear outlining of the assessment of their impacts, in line with the requirements of the Better Regulation Guidelines and Toolbox.

**Part 2**: DG HOME launched a **call for evidence and a public consultation** questionnaire on the 'Have Your Say' portal. The call for evidence was launched on the portal on 31 July and closed on 11 September 2025. The public vconsultation was launched on 21 August and closed on 27 November 2025. Both initiatives aimed at gathering the views of the general public (e.g. EU citizens, NGOs, business associations, academics, private companies, and public authorities) to ensure a broad and inclusive evidence base.

**Part 3**: **Targeted consultation activities** were divided into five subparts.

**Subpart 1 (targeted surveys)**: Two online survey questionnaires were created and launched in the form of an online survey. The first targeted national authorities from Member States and Schengen associated countries. Relevant authorities targeted include Ministries of the Interior, national authorities responsible for border management and return procedures, national police and border guard training academies, as well as Ministries of Foreign Affairs. The second survey questionnaire was designed for EBCG standing corps.

The online surveys were then distributed via email. In particular:

- The s**tanding corps survey** was launched on 16 June and was closed on 30 June. The survey collected 433 replies.
- The **national authorities survey** was launched on 25 June and concluded on 10 October 2025. The survey gathered 48 replies from 24 EU Member States and 3 Schengen associated countries.

**Subpart 2 (targeted interviews)**: 140 semi-structured interviews were conducted with key stakeholders at the international, EU, and national levels. Interviews were conducted both online and in-person. Online interviews sometimes gathered more than one participant or authority.

**Subpart 3 (field visits)**: A set of field visits were conducted in selected Member States (Bulgaria, Finland, Spain and Italy) to enhance the study team's understanding of challenges related to the

[91] ICF, 2026, Feasibility study to develop and assess potential options for the further reinforcement of the capabilities of the European Border and Coast Guard (EBCG) under Regulation (EU) 2019/1896.

implementation of EIBM under the EBCG Regulation and to gather forward-looking insights for assessing different policy options and initiatives. The visits covered a number of Frontex's and Member States' operational activities and included face-to-face interviews with relevant stakeholders. The feedback collected informed the problem definition, the development and assessment of policy options, and the preparation of thematic case studies. The findings were then used to inform a set of thematic case studies.

**Subpart 4 (expert workshops and validation interviews)**: Three expert workshops were organised, and a series of validation interviews were conducted with key Frontex staff.

- The **first expert workshop** was held online on 23 May 2025. Experts undertook an initial assessment of policy measures' descriptions, assumptions, and details. Key considerations were briefly presented in the workshop, with detailed feedback on each policy measure provided later in writing.
- The **second expert workshop** was held online on 24 July 2025. The workshop gave the opportunity to discuss the draft policy options. Ahead of the workshop, experts' inputs on the problem definition and draft policy options were collected, with the aim to focus the discussion on specific elements that warranted specific discussions.
- The **third expert workshop** was held on 20 October 2025. During the workshop, experts provided feedback on the proposed policy options and measures and the rationale for discarding some policy measures.

**Subpart 5 (thematic case studies)**: Four thematic case studies were drafted, which provided a deeper understanding of the key challenges and feasibility of potential policy options by conducting an in-depth analysis on specific angles of the key themes. The thematic focus of the four case studies was as follows:

- Case study 1: standing corps' capability development
- Case study 2: state-of-the-art technical capabilities
- Case study 3: operational concept and chain of command
- Case study 4: returns and international cooperation/

**Part 4**: Analysis and assessment of impacts part of the methodology was divided into seven subparts.

**Subpart 1:** Development of a **problem definition**, including problem drivers and consequences. The analysis was later on refined through the analysis of new evidence collected.

**Subpart 2:** Identification of **the baseline scenario,** describing how the identified problems would evolve in the absence of EU action. The baseline scenario, also referred to as Option 0 (No Intervention), is structured around key aspects and issues where significant gaps and challenges persist. These areas form the basis for the policy measures included in the policy packages, which are subsequently assessed.

**Subpart 3:** Identification of **specific policy objectives,** setting the level of ambition for the reinforcement of the capabilities of the EBCG under Regulation (EU) 2019/1896.

**Subpart 4:** Development of **four policy packages** (in line with the Better Regulation Guidelines), each one progressively more ambitious.

- **Option 0** assumes no EU action.

- **Option 1** aims to improve EBCG effectiveness by addressing current shortcomings with legislative measures.
- **Option 2** seeks harmonisation of national practices for better EIBM implementation and a comprehensive legislative proposal tackling EBCG Regulation issues.
- **Option 3** proposes expanding EBCG's mandate and capabilities for a more integrated EU response through substantial legislation.

**Subpart 5:** Analysis of the **effects and impacts of policy options**, focusing on costs and benefits for various stakeholders. In line with the Better Regulation Toolbox and the general requirements for impact assessments, the analysis covered economic, social, environmental, and fundamental rights impacts, quantifying and monetising where possible.

Expected impacts were categorised using a scoring system outlined below:

- -3 = Significant negative impact (compared to the baseline)
- -2 = Moderate negative impact (compared to the baseline)
- -1 = Minimal negative impact (compared to the baseline)
- 0 = No impact
- 1 = Minimal positive impact (compared to the baseline)
- 2 = Moderate positive impact (compared to the baseline)
- 3 = Significant positive impact (compared to the baseline)

**Subpart 6:** Comparison of options and the identification of the preferred policy option. This scored the consequences of each measure or group of measures relative to the baseline scenario against the key criteria of necessity, efficiency, effectiveness, coherence and proportionality, *in order to determine the preferred policy option*.

In practice, each policy measure was assessed against the five criteria using the key questions outlined above, as per the evaluation scale described below. The baseline is always assessed as 0.

| **Legend**: ++ = Positive + = Slightly positive +/- = Mixed effect |
|---|
| **0** = no effect - = Slightly negative -- = Negative |

The **preferred policy option** for each thematic area was selected as emerging from the comparison.

**Subpart 7:** Review of the existing monitoring and evaluation arrangements within the EBCG Regulation, and determination of whether additional arrangements are necessary to monitor progress towards policy objectives.

The current evaluation mechanism in the Regulation consists of Article 121 (EBCG Regulation evaluation) and Article 59 (standing corps review). It also includes extensive reporting obligations for Frontex to the European Commission, European Parliament, Council of the EU, and the Frontex management board. Those obligations cover operational activities, return activities, fundamental rights, EUROSUR, and more.

Policy monitoring and evaluation relied on three elements:

- **Indicators**: Developing a set of SMART indicators for evaluating the preferred (policy) options, once implemented. These measured progress against stated objectives;
- **Monitoring mechanisms**: Advising the Commission on how to monitor implementation of the proposed (policy) options, incorporating (or adding) to existing monitoring and evaluation mechanisms;
- **Evaluation arrangements**: Advising on suitable evaluation timelines and methods.

The study identified the relevant indicators for the preferred option.

## 1.2. Methodology for assessment of impacts

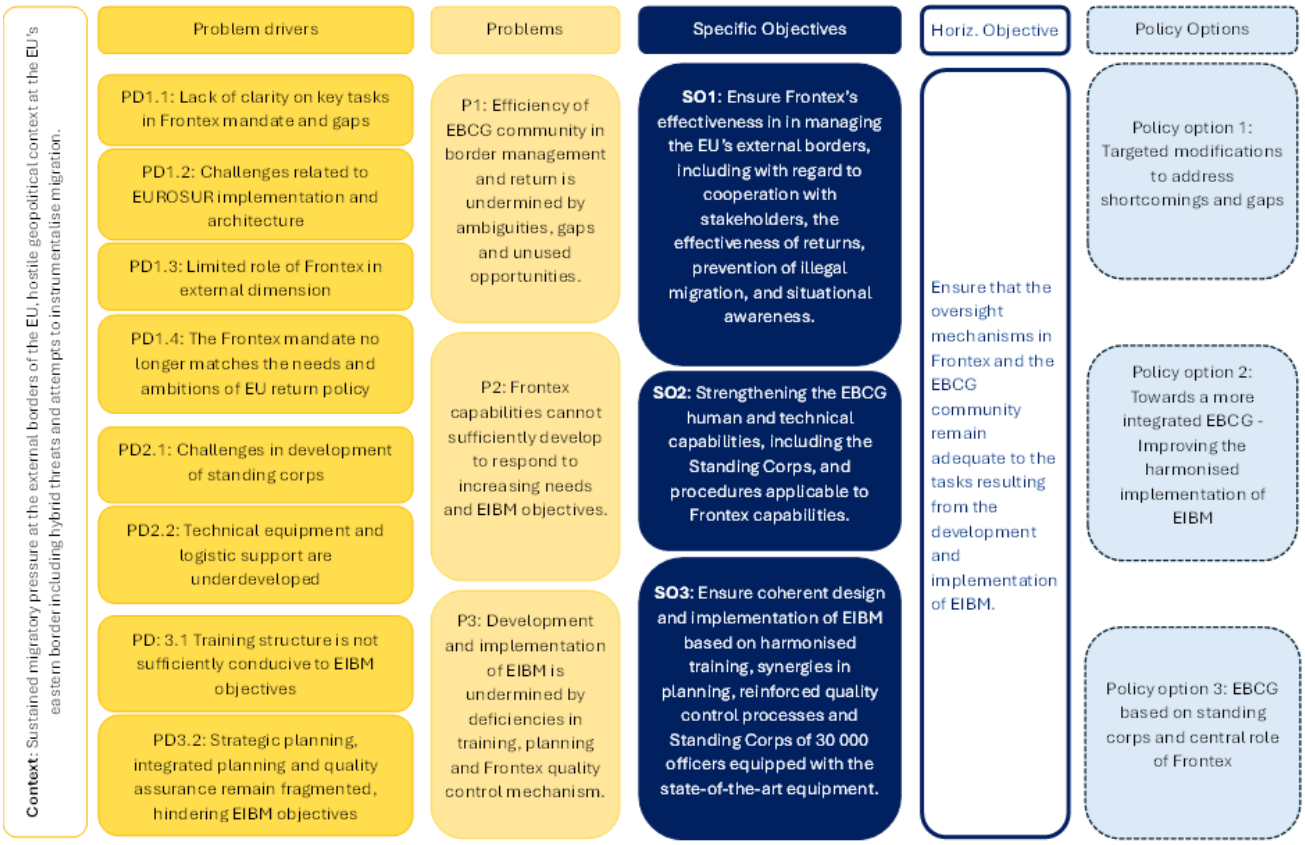



**Figure 2 - Intervention logic**

Three assessment criteria guided the assessment of the measures identified under each policy option:

a) effectiveness (degree to which the options are likely to meet the initiative's objectives);
b) efficiency (costs benefits and their distribution across stakeholders);
c) coherence (internal and with other main EU policies/legislation).

Effectiveness was assessed by examining the extent to which the intervention achieved its stated objectives. This included assessment of the information and data in the accompanying study, stakeholder feedback and assessment criteria identified in Figure 7 ('Links between objectives and assessment criteria') in Section 7.1 of the main impact assessment report.

Efficiency was evaluated by analysing the relationship between resources used and results achieved. This included assessing financial costs, social impacts including, where appropriate, administrative

burden and implementation efforts at EU and national level as well as impact on the fundamental rights. The proportionality of costs relative to benefits was also considered.

Coherence was examined by assessing the internal consistency of the intervention and its alignment with related EU legislation and broader policy objectives. The analysis identified potential overlaps, gaps or inconsistencies with other instruments at EU and national level.

## 2. Caveats and limitations

The data collected for the study has several limitations that should be borne in mind when interpreting the findings. We summarise these limitations below, along with the mitigation measures taken by the study team to address them where possible. However, the results are considered valid.

- **Gaps and inconsistencies in survey responses**
  The survey targeting national authorities resulted in 48 replies from 24 EU Member States and 3 Schengen associated countries. Approaches to responding to the survey varied. Some respondents submitted a single, consolidated reply that reflected the views of all relevant authorities (e.g. Ministries of Interior, Ministries of Foreign Affairs, Police Training Academies). Other respondents provided multiple separate replies from different institutions. In other cases, respondents submitted a single reply which did not capture the perspectives of all relevant targeted authorities. Moreover, instances of internal divergence between authorities within the same country were also observed, particularly as regards opinion-based questions.

  To account for these variations, the study team analysed the survey responses in detail, carefully distinguishing between cases where a particular view represented a majority of national authorities and those where it represented a majority of Member States / Schengen associated countries (e.g. when one country submitted multiple replies).

  The analysis also systematically flags divergences within Member States and Schengen associated countries. Where divergences were noted with regard to factual questions, the study team conducted follow-up research and consultations to ensure that correct inputs were considered as part of the analysis.

- **Limitations of the public consultation**
  The public consultation gathered 19 replies (seven EU citizens, four NGOs and one network of NGOs, two companies, one regional authority, two international organisations, and the Frontex Consultative Forum for Fundamental Rights), from nine countries (seven Member States, one Schengen Associated Country, one third country).

  The findings of the public consultation should be interpreted with caution due to several structural limitations. First of all, the **low number of responses** received (19) limits the statistical robustness of the results and implies they may not be considered representative of the broader EU population or of all stakeholders involved in EU border management. This issue is further exacerbated by the fact that respondents were **unevenly distributed across stakeholder categories**, with a relatively strong presence of NGOs, EU citizens reporting a high personal familiarity with the EBCG framework, and institutional actors. This could have the outcome of skewing results towards governance, fundamental rights, and oversight concerns, as opposed to more technical issues or matters that might represent a priority for other key Frontex stakeholders, such as the national authorities responsible for border management or return in the Member States.

Finally, it is important to note that **self-selection bias** is likely, as respondents choosing to engage with the consultation will most likely opt to do so due to strong pre-existing views on Frontex and EU border governance. This is in itself not necessarily a negative thing, as it can lead to more informed responses. Moreover, it is a dynamic that is to some extent always true for any voluntary survey.

In this case, however, the impact of self-selection bias could be enhanced by the low number of responses received, and the results skewed by the fact that the survey concerns a polarising, relatively politicised topic. These biases and limitations were mitigated through extensive consultation of other stakeholders in other settings, allowing the Public Consultation to serve as additional and complementary data to the main data collection and stakeholder consultation efforts listed above.

- **Subjectivity of stakeholders' views**
  Data collected from stakeholders (including through interviews, surveys, and visits in the field), is self-reported, meaning that it represented the subjective views, rather than objective conclusions. To help mitigate this, the report relies on the triangulation of various data sources. In addition, stakeholders consulted as part of this study for interviews, surveys, and field missions included individuals with relevant expertise on the EBCG Regulation and Frontex.

- **Limitations linked to the cost assessment**
  The cost assessment necessarily relies on assumptions about the future scale and scope of Frontex's activities, which cannot currently be verified with certainty. In particular, the unpredictability of migratory flows is a major limitation, as these will have a strong impact on operational needs and expenditures. Another caveat concerns the reliance on unit cost estimates based on expenditure in 2024 as a starting point.

  While these figures are robust from an empirical perspective, 2024 is generally considered a relatively stable year without any significant crises. Consequently, the estimates may understate the potential cost implications of large-scale or crisis-driven deployments. Other caveats related to specific categories of costs are explicitly described under Annex 11 (Thematic area with significant impact – cost assessment).

# ANNEX 5: PROBLEM DRIVERS

## 1. Problem drivers relevant for Problem 1

### 1.1.Driver: Frontex's mandate lacks clarity on key tasks and has gaps.

***Border controls***

The concept of 'shared responsibility' that underpins the EBCG Regulation[92] creates accountability gaps and uncertainties regarding operational jurisdiction (e.g. as regards maritime SAR operations)[93].

As identified in the study accompanying the Impact Assessment[94], without a specific request from Member States (or host third countries that have a status agreement) for Frontex support through standing corps deployment or through a rapid border intervention, Frontex lacks the mandate and therefore the authority to intervene independently. This means that operational needs which could justify support from Frontex, are addressed in different manners across the EU[95]. During field activities, Frontex also often[96] lacks the authority to independently exercise the 'executive powers'[97] necessary to ensure compliance with the Schengen Border Code or to act upon detected illegal border crossings in the situations involving law enforcement authorities.

The limitations concerning the performance of the executive powers are connected with **hosting capacity**. In practical terms, the number of standing corps officers that a Member State is able to host is often limited by the availability of host officers who are able to provide support, in English, so that Frontex can exercise its executive powers[98]. While such support is operationally justified during the initial deployment phase, it becomes burdensome over time and raises concerns regarding the efficient use of available resources (both local officers and standing corps) that could be used for other tasks[99].

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[92] Article 7 of the EBCG Regulation defines border management as a shared responsibility between Member States and Frontex but ultimately places primary responsibility on the individual Member States for the management of their section of the external border. In concrete terms, the sharing of responsibility and the implementation of operational support is subject to bilateral negotiations between Frontex and each Member State. These are reflected in Operational Plans for Joint Operations and return support for each Member State. For each type of border section or crossing point, Frontex adapts its responsibilities to align with national needs, hosting capacity, and the legal and operational context. Discrepancies in how Frontex contingent structures operate across the EU still exist.

[93] As regards maritime search and rescue operations, the overarching legislative framework is grounded in international maritime law, which makes the responsibility for declaring and coordinating search and rescue operations exclusively a national competence. Regulation (EU) No 656/2014 applies this framework and further defines Frontex's role in maritime border surveillance. However, the EBCG Regulation is not very explicit about key components of search and rescue — such as the duty to render assistance to persons in distress at sea as a primary responsibility during maritime operations — and could better define Frontex's operationalisation of its limited mandate in this domain.

[94] Study supporting the impact assessment [ICF feasibility study]; first expert workshop; interview with Frontex cross-border-crime detection officer; interview with national authorities.

[95] The justifications for these decisions are not made public or formally articulated. The core issue appears to lie in differing operational standards and approaches to preventing irregular entries, and in the overall level of trust.

[96] Frontex may exercise executive powers independently only upon the specific consent of the host Member State which may be given for specific tasks or periods as defined in the specific operational plan of the joint operation. In practice, this is very rarely the case. Member States prefer for standing corps officers to act only on the command and control and in the presence of the host Member State authorities.

[97] Article 55(7) of the EBCG Regulation.

[98] Typically, in joint operations at land borders, Frontex patrol vehicles include one host officer and two Frontex standing corps.

[99] Interviews with Frontex contingent commanders, Frontex group leaders and national authorities; survey with standing corps.

The administrative and practical challenges can equally affect the interest of the Member States in deployments and the effectiveness of deployed standing corps. For instance, often the first-line kiosks at border crossing points are prepared to host only one officer, while Member States require a local agent to accompany a standing corps officer inspecting travel documents. Acommodation is another recurring problem. In the survey accompanying the study, 27% of respondents reported that their country does not have capacity to provide accommodation for Frontex personnel during deployments at all. Others indicated at least some level of capacity (with 23% who said to have it to a moderate extent and 13% to a small extent). Only two countries claim to largely have this capacity.

In particular, the access for Frontex officers to relevant databases becomes crucial to ensure the full use of the advanced-level document officers deployed or to help with reducing waiting time at the border crossing points in busy periods. Yet, in practice, access to such databases is often only available either in the local language or with limited English interfaces and requires specialised training. Frontex's efforts have led to a decrease in restrictions in accessing the databases in the number of Member States has decreased[100], but it is still an issue in most of the Member States[101]. According to vulnerability assessments and Schengen evaluations, staff shortages and challenges with accessing databases at different border crossing points are a recurring problem.

***Combating cross-border crime and smuggling***

Frontex's support to the fight against cross-border crime, in particular migrant smuggling, is subject to constraints and various interpretations as already signalled in the 2024 evaluation. While some of these limitations are justified by its core mandate as Frontex's primary responsibility is not focused on ensuring internal security, certain limitations arise from ambiguity or gaps in the EBCG Regulation. On the one hand a definition of 'cross-border crime' in the EBCG Regulation[102] is broader compared to Europol's definition[103]. On the other, the EBCG Regulation[104] does not provide clear provisions on what constitutes 'detection of cross-border crime' or 'operational assistance' in the context of border management[105]. This creates uncertainties regarding the type of cross-border crime covered by the competence of Frontex.

In addition, Frontex's statutory staff can exercise executive powers, which are also relevant in the context of combating cross-border crime, only if this is authorised by the national authorities of the host Member State, thus engaging national resources and sometimes putting in question the added value of deployment[106].

These structural and operational limitations are particularly problematic in the context of migrant smuggling, which remains a persistent form of cross-border crime. The EU Action Plan against migrant smuggling[107] calls on Frontex to support law enforcement authorities and Europol by

[100] Frontex developed the 'traffic lights' system, ensured exchange of best practices and provided grants to support translation of interfaces.

[101] In 2025 only 11 Member States offered full access to the national databases, while 11 had some restrictions and 6 not allowing such access.

[102] Article 2(12) of the EBCG Regulation.

[103] In the Europol Regulation cross-border crime is defined by the involvement of two or more Member States, referring to 'serious crime' and specifically 'terrorism' and 'forms of crime which affect a common interest covered by Union policy'. Annex I to the Europol Regulation includes a full list of specific areas of crime.

[104] Article 5 of the EBCG Regulation.

[105] Article 5(3) of the EBCG Regulation: 'the Agency shall facilitate and render more effective the application of Union measures relating to the management of the external borders'.

[106] Article 82(2) of the EBCG Regulation. See also European Court of Auditors. (2021). Frontex's support to external border management: Not sufficiently effective to date (Special Report No 08/2021). Publications Office of the European Union. https://www.eca.europa.eu/Lists/ECADocuments/SR21_08/SR_Frontex_EN.pdf. Interview with: DG HOME C4; National authority.

[107] European Commission (2021) A Renewed EU action plan against migrant smuggling COM/2021/591 final.

providing updated profiles of suspicious vessels to be monitored, identified, seized, and, once relevant criminal investigations are completed by the competent authority, disposed of. It also encourages exchange of information on suspicious vessels with Europol. However, Frontex's current mandate does not clarify which analytical and situational-awareness support functions Frontex could engage in to assist Europol with migrant smuggling. This creates a mismatch between Frontex's mandate and the expected cooperation outcome. So, despite being a key area of concern for EU internal security and border management, the current legal and operational framework does not give Frontex enough tools to meaningfully contribute to counter-smuggling efforts.

***Data transfer to Europol***

Practice shows that transmissions of operational personal data[108] by Frontex to Europol presents challenges, preventing Frontex from contributing to the fight against serious cross-border crime, including migrant smuggling. Article 90 of the EBCG Regulation regulating Frontex's processing of operational personal data and internal Management Board decisions[109] impose strict limits on how and when Frontex can transmit such data to Europol[110].

This should be positively viewed as guaranteeing high safeguards for data subjects. However, due to lack of clarity, in practice these same limitations are also being interpreted as requiring Frontex to assess whether every request for operational personal data by Europol is 'strictly necessary' for the fulfilment of Europol's mandate. This is not explicitly mandated by Article 90, which instead simply sets 'strict necessity' as a logical prerequisite, but does not impose this assessment on Frontex.Frontex finds it practically impossible to assess this itself, but Europol (as the originator of such requests) could better provide this 'strict necessity' justification for its own requests to Frontex.

The current dynamic creates a situation where Frontex needs to make an assessment without the necessary information — namely whether the requested data would be strictly necessary and whether Europol could obtain it any other way — to support a Europol investigation or activity. In turn, this could result in flawed assessments that negatively impact data subjects' rights, expose Frontex to risks of mishandling personal data, and obfuscate both agencies' responsibility to correctly implement data protection rules. To mitigate these risks, at present Frontex is arguably interpreting these provisions in an overly strict manner, resulting in extremely long request processing times, frequent rejections of Europol requests, and limited data exchanges between the agencies[111]. More broadly, this can lead to missed opportunities in the fight against cross-border crime. The complexities of Frontex's data protection framework are exacerbated by the limited resources of the Frontex data protection office team and Frontex staff's limited understanding of data protection rules and their implications[112].

***Visa policy***

Although the EU visa policy is a key element of the EIBM four-tier access control model, Frontex has

[108] EUDPR Article 3(2): 'operational personal data' means all personal data processed by Union bodies, offices or agencies when carrying out activities which fall within the scope of Chapter 4 or Chapter 5 of Title V of Part Three TFEU to meet the objectives and tasks laid down in the legal acts establishing those bodies, offices or agencies. Because operational personal data refers to all personal data processed for the purposes of carrying out law-enforcement tasks, and Frontex does not have a legal basis in judicial cooperation in criminal matters or police cooperation, its processing of operational personal data is extremely limited by design.

[109] Frontex Management Board Decision 4/2024 adopting general rules on the application of the Data Protection Regulation by the Agency, and Frontex Management Board Decision 5/2024 adopting the rules on processing operational personal data by Frontex.

[110] Another difficulty exists in the inability to identify an exhaustive list use-cases for when Frontex would be needing to process operational personal data as such, in the sense of the EUDPR.

[111] These limitations came about as a result of the EDPS audit on Frontex debriefing activities – which results in inadequate levels of data sharing between by Frontex.

[112] Interview with Frontex data protection office; Frontex data protection office activity report.

a limited role to play in supporting Member States in this area. At the same time, national consular services still suffer from reductions of resources dedicated to visa processing imposed during pandemic and never restored which makes a central level support even more needed.

Ad hoc training sessions or webinars offered by Frontex are not sufficient to meet the scale and complexity of the challenges faced by the Member States[113]. In particular, the specific expertise on document fraud techniques and trends and risk assessment could be valuable to prevent visa abuse[114] but Frontex's support in this area remains limited[115]. The absence of a dedicated EU agency for visas to support Member States on visa policy is apparent from the first EU Visa Strategy adopted on 29 January 2026. This is a problem, since the efficient implementation of the common rules in this area calls for increased coordination of the operational cooperation between the Member States and an EU agency would be best placed to help with that coordination.

***Emergencies and hybrid threats***

Over the past decade, Europe has faced a growing number of natural disasters and major health emergencies, such as the COVID-19 pandemic. These events have required national border authorities to implement special measures or undertake activities outside the procedures set out in the Schengen Border Code[116]. Hybrid threats at the external borders can trigger the same need for exceptional border procedures and rapid reinforcement, for instance through instrumentalisation of migration, sabotage or disruption of border infrastructure and IT systems, or hostile/unlawful use of unmanned aerial systems (UAS) for reconnaissance, smuggling facilitation or disruption around sensitive border areas (including border crossing points and nearby critical infrastructure). This strengthens the case for clearer provisions on crisis coordination arrangements and for the use of relevant surveillance / counter-UAS capabilities within the limits of the legal framework.

Frontex's mandate does not explicitly allow support to Member State authorities in exceptional situations beyond traditional border management, preventing Frontex from assisting Member States during such crisis situations[117]. In practical terms, the types of support that may be needed in such exceptional situations (upon request by the host Member State) include: personnel deployed to sustain border checks and manage exceptional flows at border crossing points; operational coordination and contingency planning support; mobile surveillance and situational awareness support (including temporary deployment of surveillance assets and technical support to ensure continuity of information exchange); and logistical support to enable sustained deployments (transport, accommodation, communications, equipment readiness). Where the mandate and/or operational planning framework does not clearly cover such crisis-specific support, assistance risks remaining ad hoc and slower, with gaps being covered only through national arrangements and civil protection mechanisms.

Frontex also does not have the competence to respond to broader hybrid threats except for instrumentalised migratory flows, where migration flows are used as an instrument to disrupt borders, increase geopolitical pressure, and influence socio-political life in a given country. The EBCG

[113] Source: Interview with Frontex 'Operations Support Systems' Unit.

[114] Interviews with: DG HOME; Frontex Operations Support Systems Unit; Frontex (2025) Enhancing EIBM through more effective cooperation with third countries – a deep dive paper on third country engagement; Frontex (2025) White Paper on reinforcing Frontex to future-proof the EIBM.

[115] The 2024 Consolidated Annual Activity Report indicates that Frontex launched a call for a Pilot Analytical Activity on Fraudulent Obtained Visa, and that 13 Member States expressed interest. See Frontex (2025) Consolidated Annual Activity Report 2024. caar-2024.pdf

[116] Regulation (EU) 2016/399 of the European Parliament and of the Council of 9 March 2016 on a Union Code on the rules governing the movement of persons across borders (Schengen Borders Code), OJ L 77, 23.3.2016, pp. 1-52.

[117] Interviews with Frontex OPD for the purpose of the study accompanying the Impact Assessment;

Regulation mentions hybrid threats only in a non-binding recital[118], which does not give Frontex operative authority to act on them.

This inability to assist national authorities when addressing other types of emergencies (e.g. natural disasters or hybrid threats) may be perceived as missed opportunities in the EU's overall resilience and have negative consequences for local perceptions of Frontex. It is also important to consider that the rapidly evolving phenomenon of hybrid threats might require fundamentally new, complex and well-coordinated operational response involving competencies for border management that do not exist at present.

### 1.2 Driver: fragmented implementation of the European Border Surveillance System (EUROSUR)

The fragmented implementation of EUROSUR (the integrated framework for the provision of situational awareness to the EBCG community and a key element of collective insight into the situation at the EU external borders) has hindered the attainment of the system's full capacity. While acknowledging the progress made so far in the implementation of EUROSUR and recognising that its implementation is not due to be completed until the end of 2026, it is already clear that several operational and technical issues will continue to hinder EUROSUR's effectiveness and are not likely to be solved with the completion of the implementation process. There are also a number of issues that require modification and improvement in order to address the operational needs of the Member States and Frontex, and to make EUROSUR a sustainable and future-proof tool[119].

The study accompanying the Impact Assessment indicated several aspects, mostly concerning the implementation by Member States. Those include inconsistent development of 'national situational pictures'[120], in particular the operational layer as it is shared among relevant national authorities only by half of the Member States[121], and shortcomings affecting data quality and completeness, including timeliness and accuracy of reported information[122].

Implementation issues also persist in the real-time exchange of surveillance data and the interoperability of national systems with EUROSUR's central platform[123]. According to Frontex, in the final quarter of 2024, 46% of single events were reported late and data provided were incomplete (in 39% of cases exact location was missing, in 45% cases the nationality of migrants or suspects was omitted)[124]. This has a detrimental effect on EUROSUR's effectiveness, leading to persistent gaps in situational awareness and reducing EU's ability to anticipate and respond to border-related risks[125].

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[118] See Recital 40 of the EBCG Regulation which outlines Frontex's role in preparing risk analyses that cover 'threats of a hybrid nature' among other elements relevant to integrated border management.

[119] Interviews with: Frontex EIBM Division; Other EU agency and body; Frontex OPC; Frontex (2025) EUROSUR: State of implementation and outlook; Report to the Council of the European Union.

[120] The national situational picture is the aggregation of operational, tactical and strategic information at national level, enabling Member States to maintain situational awareness of activities, risks and incidents at their external borders and to support effective border management and decision-making. The 2024 evaluation of the EBCG Regulation concluded that the fragmented national situational pictures derive from inconsistent application of the EUROSUR-related provisions by Member States. Half of the Member States share the operational layer among relevant national authorities and only half share their national situational picture with neighbouring Member States.

[121] The 2024 evaluation of the EBCG Regulation.

[122] While the EUROSUR legal framework sets out requirements for data quality, it lacks enforcement mechanisms.

[123] Frontex report to the Council of the European Union, EUROSUR – State of implementation and Outlook, March 2025. Other issues: the performance across national coordination centres is uneven. There is also legal uncertainty regarding the respective roles of national coordination centres and national Frontex points of contact.

[124] Frontex (2025) Presentation of Data Quality Report.

[125] Frontex (2025) EUROSUR: State of implementation and outlook; Report to the Council of the European Union; Frontex (2025) Consolidated Annual Activity Report 2024; Interviews with Frontex, national authorities. The majority of national

However, the increased need for better situational awareness to capture all types of threats at external borders while supporting the objectives of return policy, puts in question the relevance of the scope of EUROSUR to the address the current situation at the EU external borders. First, EUROSUR does not encompass the full spectrum of EIBM, such as internal security threats, including threats of a hybrid nature which are becoming a persistent phenomenon in the EU. Second, Article 89(2) of the EBCG Regulation allows access to only two types of personal data in EUROSUR: i) information on ship and ii) aircraft identification numbers, although an exception exists to allow the processing of other personal data in EUROSUR for exceptional purposes strictly connected to the purposes of EUROSUR. As a result, Frontex does not collect ownership personal data that could benefit situational awareness. Third, in practice data exchanged in EUROSUR between Member States and Frontex is commonly labelled as sensitive non-classified, and a small part is classified as RESTREINT UE/EU RESTRICTED. At the same time, the Regulation requires the systems be[126]. This creates a clear misalignment between the practice and legal obligations leading to overclassification of information which hampers effective information exchange between Member States and Frontex. Fourth, in order to ensure effective monitoring and timely identification of suspicious flights, including commercial and private flights, but also remotely piloted aircrafts, there is a need to further clarify the scope of 'air border surveillance' provided already in recital 35 and Article 2(6) of the EBCG Regulation. Finally, from the perspective of Frontex, the lack of a clearly forward-looking approach aiming at identification of potential strategic and operational risks in border management amounts to a loss of opportunity to develop a more proactive situational awareness tool, driven by multi-factor, all-source analysis[127] that could allow for deeper insights on risks and challenges affecting the EU external border[128]. All of the above-mentioned gaps result in European situational picture which negatively impacts situational awareness and reaction capability at the EU level[129].

### 1.3 Driver: Challenges encountered by Frontex in the external dimension

The study accompanying the Impact Assessment showed that Frontex remains constrained by several structural and procedural challenges[130]. Its cooperation with third countries, international organisations and CSDP missions is hampered by legal constraints. Those constraints increase its administrative burden and limit its ability to engage effectively and strategically with stakeholders and its position as a key actor in the EU's engagement outside Europe[131]. The closed list of international organisations provided in Article 68 of the EBCG Regulation also limits Frontex structural cooperation[132].

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authorities responding to the survey disagreed with the following statement: 'the type and scope of information received and shared via EUROSUR is sufficient for effective border management'.

[126] Article 14 of the EBCG Regulation provides that Frontex establishes and maintains the communication network responsible to the exchange of sensitive non-classified and classified information up to CONFIDENTIEL UE/EU CONFIDENTIAL with, and among, national coordination centres.

[127] Frontex report to the Council of the European Union, EUROSUR – State of implementation and Outlook, March 2025.

[128] Decision of the Executive Director No R-ED-2025-27 on the adoption of the EIBM Intelligence policy implementation roadmap.

[129] Frontex report to the Council of the European Union, EUROSUR – State of implementation and Outlook, March 2025.

[130] European Commission (2024) Commission Staff Working Document. Evaluation report from the Commission to the European Parliament and the Council; Frontex (2025) Deep Dive. Enhancing EIBM through more effective cooperation with third countries- a deep dive paper on third country engagement; Frontex ICU (2025) Briefing Note. International cooperation and EBCG Regulation; Interviews with: Frontex STRAT Division; Frontex OPC; EIBM Intelligence Division; INTEL Division; DG HOME; Frontex FLO; European Commission SG; other EU agency and body.

[131] Frontex is already mandated to cooperate with CSDP missions (Article 68(1)(j) EBCG Regulation), but uptake has been minimal (only two working arrangements signed with EUAM Ukraine (active) and EUBAM Libya (discontinued)). Prospects for new working arrangements with Frontex seem rather low. Contributing factors are (i) low awareness of the complementarity of mandates and what Frontex could offer to support CSDP missions and (ii) legal constraints on CSDP mission mandates, which do not provide for Frontex staff to be seconded on CSDP missions, for example.

[132] Interviews with Frontex INTEL Division, Frontex Operations Centre, Frontex STRAT Division; DG HOME; ICF (2023) Study supporting the evaluation of the EBCG Regulation and review of the standing corps.

***Limitations of the status agreements including their limited attractiveness***

Status agreements are legally binding agreements between the EU and a third country that allow the third country to request operational support from Frontex (including tasks requiring executive powers). They also regulate aspects like the privileges and immunities of Frontex staff deployed to the third country. Status agreements currently cover only part of Frontex's mandate by allowing for the deployment of border management teams only. They are not a tool that can currently be used to foster cooperation on return with third countries[133]. The Commission has had difficulties opening negotiations for new agreements with non-neighbouring countries largely due to these third countries' reluctance to any potential deployment of Frontex personnel on their territory[134].

The increasing volume of travel to the EU and concurrent rise in visa abuse cases[135] mean there is a growing need to strengthen the capacity to identify potential irregular passengers at third-country airports prior to boarding[136]. In several partner countries, Member State liaison officers carry out pre-departure checks[137], which illustrate the effectiveness of such upstream measures. Comparable activities can, in principle, also be performed by standing corps officers acting under the authority of the host country and in accordance with its legal framework.

However, in practice, such pre-departure activities have rarely and only to a limited extent been included in operational planning, due to third countries' limited awareness of the possibility of receiving such support and that border checks on exit are less relevant from a border management perspective. Nonetheless, such pre-departure checks might serve the mutual interest of the country of departure and country of destination to reduce the readmission cases. As a result, opportunities to integrate pre-departure screening or document security support into operational plans at third-country airports have not been seized, despite their potential contribution to ensuring that passengers travelling to the Schengen area meet the entry conditions under the Schengen Borders Code.

***Administrative procedure related to working arrangements perceived as excessive***

Frontex may cooperate with the border management authorities of third countries on the basis of non-binding working arrangements which aim at establishing capacity building measures such as training. However, the process for authorising the signature of the working arrangements is regarded as slow[138]. Unlike other Justice and Home Affairs agencies (such as Europol or the EUAA[139]), the EBCG

[133] Capacity building activities on returns can be done in the context of working arrangements with third country authorities (under Article 73 EBCG Regulation).

[134] Interviews with Frontex STRAT Division; EIBM Intelligence Division; INTEL Division; DG HOME; DG INTPA; DG MENA; Frontex FLO; European Commission SG; European Commission (2024) Commission Staff Working Document. Evaluation report from the Commission to the European Parliament and the Council.

[135] IATA (2025) *Global Air Passenger Demand Reaches Record High in 2024;* Frontex (2025) Annual Risk Analysis 2025/2026. In 2024 air continued to be the most popular way of entering and leaving the Schengen area, with half a billion passengers.

[136] Air travel remains a significant entry avenue, also due to migrants exploiting visa-free regimes and transit hubs (Frontex (2025) Annual Risk Analysis 2025/2026). Interviews with: DG HOME; Frontex Operations Support Systems Unit; Frontex (2025) *Enhancing EIBM through more effective cooperation with third countries – a deep dive paper on third country engagement;* Frontex *(2025) White Paper on reinforcing Frontex to future-proof the EIBM.*

[137] Interview with Frontex Operations Support Systems Unit; Frontex (2025) *Enhancing EIBM through more effective cooperation with third countries – a deep dive paper on third country engagement;*

[138] Interviews with: Frontex STRAT Division; Frontex OPC; EIBM Intelligence Division; INTEL Division; DG HOME (2); FLO; European Commission SG; other EU agency and body; ICF (2023) Study supporting the evaluation of the EBCG Regulation (EU) 2019/1896 and the review of the standing corps; Frontex (2025) Enhancing EIBM through more effective cooperation with third countries – a deep dive paper on third country engagement; Frontex (2025) Briefing Note on International cooperation and EBCG Regulation;

[139] For instance, Article 35 of Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010 (on cooperation with third countries) only provides that the EUAA '[…] *may carry out such cooperation within the framework of working*

Regulation requires Frontex to obtain authorisation from the European Data Protection Supervisor (EDPS) before concluding working arrangements with third countries[140]. This requirement seems disproportionate since (i) those working arrangements are non-binding instruments and (ii) the personal data exchanged as part of those working arrangement would only to a very limited extent be exchanged with a third-country authority as a direct and natural consequence of their cooperation. More consequential personal data transfers occur for example when Frontex plans a training or conference activity with the third country authority in question and, for that purpose, needs to share the necessary information regarding Frontex staff, trainers or participants (e.g. names, contact data etc.)[141].

The administrative procedure linked to receiving formal prior approval for each individual working arrangement seems disproportionate[142] if we contrast the type of capacity building activity Frontex is to pursue (and the limited personal data transferred as a result) with the time it takes to complete these administrative steps[143]. The delays created by this administrative procedure mean Frontex cannot effectively engage in capacity building activities in third countries, which are at the core of its mandate. Frontex has also encountered difficulties concluding working arrangements with international organisations for the same reasons[144].

**Deployment and role of Frontex Liaison Officers (FLOs)**

Deploying FLOs is another example of a process that involves an excessive administrative burden but

*arrangements concluded with those authorities in accordance with Union law and policy. The Management Board shall decide on those working arrangements, which shall be subject to prior approval by the Commission. Frontex shall inform the European Parliament and the Council before a working arrangement is concluded.'*

[140] Frontex (2025) Enhancing EIBM through more effective cooperation with third countries – a deep dive paper on third country engagement; input from DG HOME.

[141] Under Article 73(4) of the EBCG Regulation Frontex is obliged to request prior authorisation from the EDPS where those working arrangements provide for the transfer of personal data and where provided for by Regulation (EU) 2018/1725 (the EUDPR). Article 48(3) of the EUDPR provides that, subject to the authorisation of the EDPS, appropriate safeguards for data transfers may also be established through contractual clauses or provisions in administrative arrangements between public authorities or bodies, in particular where these include enforceable and effective data subject rights. The term 'in particular' suggests that enforceability is a key criterion, but not necessarily an absolute requirement. Frontex's working arrangements with third country authorities are non-binding and typically do not meet this enforceability threshold.

[142] In order to receive formal approval from the EDPS, Frontex needs to engage in an extensive collection of information and drafting of a transfer impact assessment which takes several months to prepare. This includes a detailed description of all transfers (controller, joint, controller or processor; type of transfer, format of transfer [encrypted, pseudonymised, plain text etc.], frequency of the transfer, volume of transfer, onward transfer possibilities, categories of personal data, categories of data subjects) and an extensive analysis of the legal landscape of the third country, taking into account the accession to international treaties, independence of local data protection authorities, data subject rights, remedies available, other laws and practices allowing access to data by national authorities (such as surveillance laws), identification and adoption of supplementary measures of technical, contractual or organisational nature and any options of the data protection officer. (EDPS - Transfer Impact Assessment checklist - Article 4(3) EUDPR). This assessment requires the involvement of a large number of staff, from the international cooperation unit staff negotiating the working arrangement, to units that will play a part in implementing the foreseen activities, and the DPO office. The transfer impact assessment is submitted together with the draft negotiated text of the working arrangement to the EDPS of an opinion which takes additionally several months, and is often preceded by additional revision requests, prolonging the procedure.

[143] For example, the request for EDPS authorisation for a recent draft working arrangement with Cabo Verde that Frontex sent to the EDPS at the end of August 2025 was still pending reply at the end of February 2026). This was despite the fact that (i) this draft working arrangement included the necessary personal data protection provisions as provided for in the Commission's Model Working Arrangement (that had received a positive EDPS opinion) and (ii) Cabo Verde has a data protection regime like that of the EU, and (iii) Frontex and the Frontex DPO had prepared an extensive transfer impact assessment before sending the request to the EDPS. The file involved over 6 months of administrative steps just for the EDPS authorisation, which precedes the formal Commission and Management Board approval and the actual signature of the working arrangement. This is excessive for organising capacity building activities like training courses.

[144] Frontex (2025) Consolidated Annual Activity Report 2024. In 2024, negotiations to conclude working arrangements with IOM and UNHCR failed in the absence of the agreement on the provisions related to personal data exchange.

which, for Frontex staff, is instrumental in establishing partnerships and encouraging broader structural cooperation. It also fundamental for capacity building and technical assistance projects in third countries. In line with the EBCG Regulation[145], the Management Board is required to adopt a list of priorities for FLOs on a yearly basis, although its purpose and effect are limited as the list of priorities rarely changes[146].

**Cooperation with Common Security and Defence Policy (CSDP) missions remains underused.** The evaluation of the EBCG Regulation found that there was growing interest from both Frontex and the EEAS in furthering Frontex's cooperation in the context of CSDP missions[147]. This growing interest was also clear from feedback gathered by Frontex staff consulted for the purpose of the study[148]. However, despite the existence of a working arrangement between Frontex and the EEAS from 2014[149], operational coordination in the context of CSDP[150] missions remains limited compared with political expectations regarding Frontex's engagement in third countries and the potential for closer cooperation between Frontex and CSDP missions. It would be in the EU's interest to allow Frontex to make better use of the established presence of CSDP missions, to contribute Frontex's expertise on integrated border management and to build relationships with local partners in third countries where Frontex does not have such established ties[151]. A key factor hindering deeper engagement is the civilian nature of most CSDP missions, which tend to focus more on strategic advice, capacity building and rule-of-law support than on operational border management. There is, though, political interest in engaging with countries in this area and therefore an opportunity to use Frontex's capabilities, but Frontex's mandate does not allow it to directly support CSDP missions.

**Restrictions on cooperation with international organisations.** The EBCG Regulation[152] provides an exhaustive list of organisations with which Frontex may conclude working arrangements. Broadening the scope of Article 68 was already recommended in the 2024 evaluation of the EBCG Regulation and evidence gathered during the study accompanying the Impact Assessment supported this finding[153]. Working arrangements that were agreed with certain key stakeholders prior to the entry into force of the 2019 EBCG Regulation, such as the International Centre for Migration Policy Development (ICMPD) – a key player in implementing EU-funded projects relating to migration and border management in third countries – had to be terminated because the current EBCG Regulation does not make provision for them. This brought to an end the long-standing structured cooperation between ICMPD and Frontex, which is clearly a missed opportunity and an undesirable outcome.

### 1.4 Driver: gaps and ambiguities affecting the effectiveness of Frontex in terms of returns

Frontex provides Member States with crucial technical, operational and financial support relating to

[145] Article 77(2) of the EBCG Regulation.
[146] Frontex STRAT Division (2); FLO; Frontex (2025) *Briefing note – international cooperation and EBCG Regulation*.
[147] European Commission (2024) Commission Staff Working Document. Evaluation report from the Commission to the European Parliament and the Council, eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024SC0075.
[148] Interviews with: Frontex Operations Directorate; EEAS (2); DG INTPA; DG HOME; Frontex (2025) White Paper on reinforcing Frontex to future-proof the European Integrated Border Management. Frontex (2025) Enhancing EIBM through more effective cooperation with third countries – a deep dive paper on third country engagement.
[149] Working arrangement between Frontex and the European External Action Service. Available at: https://prd.frontex.europa.eu/document/european-external-action-service-working-arrangement.
[150] Frontex only concluded working arrangements with the EU Capacity Building Mission in Niger (EUCAP Sahel Niger) and the EU Advisory Mission for Civilian Security Sector Reform Ukraine (EUAM Ukraine).
[151] Interview with EEAS, Frontex Operations Directorate; Frontex STRAT Division; DG HOME.
[152] Article 68 of the EBCG Regulation.
[153] Interviews with Frontex INTEL Division, Frontex Operations Centre, Frontex STRAT Division; DG HOME. In addition, 56% (19 out of 34) of national authorities from 17 countries that responded to the survey agreed that Frontex should be mandated to cooperate with any international organisation, provided it is approved by the Management Board.

returns. Currently, fewer than 1 in 4 individuals without the right to stay in the EU are effectively returned from the EU to a third country[154]. In 2024, Frontex supported over 40% of the effective returns that took place in the EU (56 263 out of 136 714)[155] while many return-related activities continue to be carried out by Member States using national or AMIF funding[156][157]. Although the Frontex-supported share of return activities has risen significantly (it stood at under 30% in 2019), the rate of growth appears to be slowing due to a number of different factors, some of which were identified in the 2024 evaluation of the EBCG Regulation and in the study accompanying the Impact Assessment.

Despite the increase in Frontex's returns operations in recent years, its effectiveness in terms of returns is constrained by a range of structural, operational and legal challenges that limit its ability to provide consistent and coordinated support to Member States. The Commission plans to adopt a proposal on digitalising case management in the area of return, readmission and reintegration. In that context, there is a need to strengthen Frontex's role and reflect the necessary mandate changes in the revision of the EBCG Regulation to bring about tangible benefits for EU migration and border-management policy.

As outlined by the President of the Commission in the 2024-2029 political guidelines[158], given the current situation, the EU has a high level of ambition regarding increasing the number of returns. At the same time, the political guidelines stress the need to strengthen the EBCG. Therefore, both ambitions reflect the objective of ensuring that Frontex can support the additional needs of Member States in order to achieve EU policy priorities, including the return of third-country nationals without the right to stay in the EU.

Additional information on gaps and ambiguities affecting the effectiveness of Frontex in terms of returns is given in Annex 6.

## 2. Problem drivers relevant for Problem 2

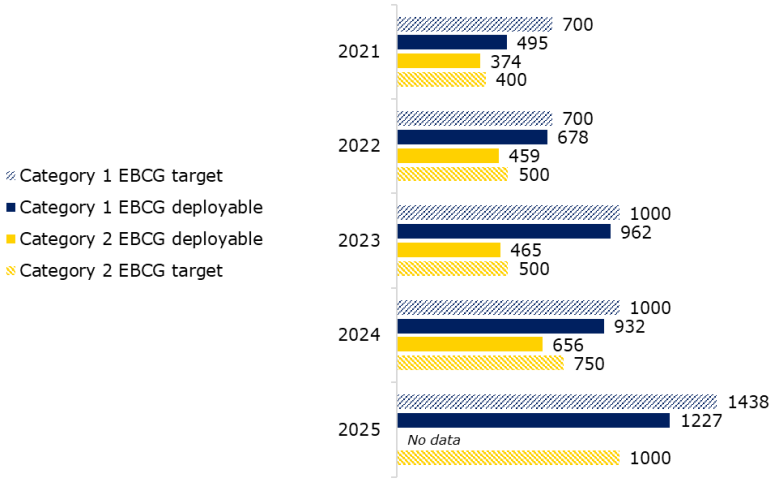
### 2.1 Driver: challenges in developing the standing corps

**Recruitment and retention of Category 1**. The size of the Category 1 standing corps has increased progressively since it was established and is projected to reach the target of 3 000 officers by 2027 (Figure 1).

[154] The overall return rate across the EU in the first half of 2025 stood at 24% (Eurostat).
[155] IRMA and FRONTEX Evaluation Report on the results of returns implemented in the second half of 2024, available at: Frontex Public Register of Documents.

[157] IRMA and FRONTEX Evaluation Report on return operations conducted in the first six months of 2025, available at: Frontex Public Register of Documents.
[158] Political Guidelines for the Next European Commission 2024-2029 'A Union that Strives for More. My Agenda for Europe'.

Figure 1: Comparison of the target and actual number of officers in the standing corps, Categories 1 and 2, per year




*Source: Produced by ICF using Frontex data. Target quotas are based on Frontex Management Board decisions adopting standing corps annual plans (i.e. the number of officers expected to be available for operational duties). Data on deployable staff are based on annual Frontex implementation reports.*

The study accompanying the Impact Assessment showed that there are several challenges affecting the recruitment of Category 1 officers. Interviews with Frontex stakeholders highlighted the fact that Frontex taps into the same resources as national services, creating direct competition for experienced personnel[159] with a background in law enforcement.

Another challenge is related to the frequency of deployments and to the remoteness of certain deployment locations, resulting in operational, psychological and family-related problems (e.g. housing or schooling for children)[160]. These problems are also a frequent source of complaints[161] affecting motivation and job satisfaction[162].

Ensuring realistic planning of recruitment is also a challenge. Owing to the constraints faced by training and recruitment entities, annual recruitment capacity is currently estimated to be a maximum of 1 000 recruits[163]. For more details on training constraints, see Problem 3. Frontex also faces challenges in achieving a balanced and representative workforce[164]. The 2024-2027 Frontex Human Resources Strategy acknowledges this imbalance and attributes it to disparities in national working conditions and salary levels, which affect the relative attractiveness of Frontex contracts[165]. Officers

[159] Interviews with Frontex Human Capital Division, Frontex Capabilities Division and Frontex Contingent Commander.
[160] Interview with Frontex Contingent Commander. Interview with Frontex Human Resources Unit.
[161] Survey of standing corps: greater flexibility and transparency regarding deployment and rotation decisions was highlighted as an area for improvement (38%; 44 out of 115 – Open question).
[162] Interview with Frontex Human Capital Division.
[163] Interview with Frontex Deputy Executive Director of Administration and Information Management, Human Resources and Corporate Services Division (HRS) and Information Management Division (SIM).
[164] Staffing data from 2025 show that certain countries are over-represented in Frontex, namely Greece (+18% deviation from total population), Poland (+16%) and Romania (+12%), while the three most under-represented countries are Germany (-17% deviation), France (-13% deviation) and Italy (-6%). Source: Frontex (2025), Recruitment and staffing data.
[165] Management Board Decision 44/2023 of 22 November 2023 adopting the Frontex Human Resources Strategy 2024-2027.

themselves also feel that there are inefficiencies regarding staffing[166].

Finally, the lack of a structured, long-term career pathway for standing corps officers affects the prospect of retaining staff. The use of 5+5 year fixed-term contracts[167] as a rule, and the lack of structured opportunities for progression (for example, the prospect of securing a permanent contract) within Frontex are key factors that deter new applicants[168].

**EU Staff Regulations and Conditions of Employment (CEOS).** Unlike other categories, Category 1 standing corps staff are covered by the Staff Regulations. The 2024 evaluation of the EBCG Regulation highlighted the challenges in applying the EU employment framework to Frontex's operational staff, as, in some cases, the applicable rules are not the most appropriate for operational, uniformed staff with executive powers[169]. Recent consultations with Frontex and European Commission stakeholders highlighted the fact that applying a civilian employment framework to Frontex's operational staff hinders the standing corps' ability to effectively perform tasks during operations, as it leads to a mismatch between the working conditions offered to standing corps Category 1 officers and the reality of their duties[170].

In particular, the following issues have an impact on Frontex's operational staff.

- **The duration of the probation period**: under the EU framework, probation for newly recruited staff lasts nine months. This is not aligned with the length of the operational training programme necessary for the deployment of standing corps Category 1 officers, which lasts approximately one year. This means that, by the end of their probation period, officers are still in training and not yet performing the duties for which they were recruited. As a result, the probation period can only reflect their performance during training and not when they are actually on duty. Additionally, this can result in officers being officially appointed to their post before they have successfully completed the training.
- **Working patterns**: national border guard services typically operate under specific working patterns that allow for a wide variety of shift and stand-by schemes. However, these are only partially covered by the implementing rules of the EU Staff Regulations which lay down the conditions and related allowances for stand-by duty[171] and shift work[172]. When on deployment, Frontex standing corps officers need to accept shifts and work schedules that differ from the working conditions in the Member State of deployment. While financial entitlements for these different working conditions are already applicable to standing corps Category 1 officers, the current EU legal framework does not cover all patterns they are expected to work during their operational activities, leading to inconsistencies and practical operational challenges.

[166] Survey of standing corps: only 53% of respondents (158 out of 298) agreed Frontex was attracting the required staff and 49% (135 out of 298) agreed that Frontex was retaining the people it needed to achieve Frontex's mission.
[167] According to Article 95(3) 'the contract should follow a 5+5 years approach in principle'. Permanent contracts are therefore possible, but not used.
[168] Survey of standing corps; Interview with Frontex Human Capital Division.
[169] European Commission (2024) Commission Staff Working Document. Evaluation accompanying the report from the Commission to the European Parliament and the Council. COM(2024) 75 final.
[170] See Case Study on standing corps capability development in the Annex to the study accompanying the Impact Assessment.
[171] Council Regulation (EC, Euratom) No 1945/2006 of 11 December 2006 amending Regulation (EEC, Euratom, ECSC) No 495/77 determining the categories of officials entitled to, and the conditions for and rates of, allowances for regular standby duty.
[172] Council Regulation (ECSC, EEC, Euratom) No 300/76 of 9 February 1976 determining the categories of officials entitled to allowances for shiftwork, and the rates and conditions thereof. Available at: https://eur-lex.europa.eu/eli/reg/1976/300/oj/eng.

- **Deployment conditions**[173]: under Article 95(2) of the Regulation, Warsaw is 'in principle' the official place of employment for all statutory staff. As a result, long-term deployments to other Member States or third countries are managed under the mission framework[174], with allowances and entitlements (daily subsistence allowance and accommodation costs) that were designed for short-term duty travel rather than long-term operational service. Given the growing number of standing corps Category 1 staff[175], this entails a significant financial and administrative burden for Frontex, which needs to process and manage a substantial number of mission orders and claims. Additionally, the current system does not reflect the specific features of and differences between operational deployments to different locations and the related working conditions (difficulties depending on the type of work, risks related to the tasks performed).
- **Permanent contracts**: while legally possible[176], it is not standard practice for Frontex to offer permanent contracts owing to a number of limitations of the EU retirement framework. In most EU Member States, law-enforcement personnel benefit from early-retirement schemes, linked to the unique demands and risks associated with their professions. However, the EU framework sets the retirement age at 66, with early retirement only being possible with a reduced pension.

Additionally, the feasibility study[177] identified a number of limitations linked to promotion and career progression, including the disconnect between the Frontex role-based ranking system and the career-based system under the Staff Regulations.

The 2024-2027 Frontex Human Resources Strategy also acknowledges these limitations, noting that there was no precedent for the standing corps, as the first uniformed category of EU staff with executive powers, and that it could not have been set up with an alternative employment framework catering toFrontex's specific needs.

**Seconding and nominating standing corps staff in Categories 2 and 3.** The competition between Frontex and the Member States for experienced personnel also affects Categories 2 and 3. Moreover, difficulties in organising deployments[178] and the cancellation of planned deployments by the host Member States without warning[179] are mentioned as obstacles that can make it difficult for Member State authorities to fulfil standing corps quotas (as set out for these two categories in Annex II and III to the EBCG Regulation). In that connection, Frontex stakeholders also mention the misalignment between the fixed numerical target for standing corps contributions and the operational performance of the EBCG community as a whole[180]. Several national authorities consider that further increasing Category 2 and 3 contributions would amplify the cumulative strain on resources and limit coverage

[173] See European Commission (2017). Guide to missions and authorised travel accompanying the Commission Decision on the general provisions for implementing Articles 11, 12 and 13 of Annex VII to the Staff Regulations of Officials (mission expenses) and on authorised travel. Annex. C(2017) 5323 final.
[174] Commission Decision of 13.5.2025 on the general provisions for implementing Articles 11, 12 and 13 of Annex VII to the Staff Regulations of Officials and on authorised travel, C(2025) 2495 final.
[175] The number of standing corps Category 1 staff is projected to reach 3 000 by 2027 under the current EBCG Regulation.
[176] Article 95(3) of the EBCG Regulation sets out the 5+5 year contract model as the principal recruitment period for standing corps staff, with the possibility to offer a permanent contract after the first five-year renewal.
[177] ICF, 2026, Feasibility study to develop and assess potential options for the further reinforcement of the capabilities of the EBCG under Regulation (EU) 2019/1896.
[178] One common issue, for example, is that deployment location is often communicated only a couple of weeks prior to the date of departure. Interviews with Frontex standing corps staff in Category 2; Maltese authorities.
[179] In the first half of 2025, 570 planned deployments were cancelled by Member States/SACs. See Frontex (June 2025). Report on Capabilities to the Management Board.
[180] Frontex (2025). Developing, delivering and deploying capabilities − A deep-dive into the Agency's future as a partner to Member States.

of core operations at national level[181]. As such, reliance on Member States alone to recruit, train and nominate specialised officers for secondment is unsustainable in the long term, as it results in trade-offs between national priorities and EU objectives[182].

**The length of deployments** for Category 2 and 3 officers is a contentious issue, and was already flagged up in the 2024 evaluation of the EBCG Regulation. Despite longer deployment periods being more effective for operations, several Member States would not wish to have longer deployments[183]. On the one hand, short deployments – particularly in the case of Category 3 officers – are considered to be less operationally effective by Frontex stakeholders, as time is needed for officers to familiarise themselves with their tasks and adapt to local working dynamics[184]. On the other hand, longer deployments hamper national planning and may make it more difficult for officers returning from secondment to rejoin national operations. Member States do not systematically plan for when officers return to national service following their deployment with Category 2[185]. As a result, those officers frequently face uncertainty regarding their professional future[186]. Half of the Member States are not in favour of increasing the deployment duration for Category 2, and over one third are against increasing the deployment duration for Category 3[187].

**The financial support system.** The EBCG Regulation makes provision for a financial support mechanism to help Member States secure their standing corps contributions[188]. This mechanism, which already featured in the 2024 evaluation of the EBCG Regulation, was identified as being cumbersome for the Member States[189]. Other limitations were also identified, namely that (1) the system does not provide for any flexibility in the event of structural changes in the national authorities, which may be unrelated to staffing trends[190], rendering the Member State ineligible for funding and (2) the maximum quota used to calculate the financial support provided to Member States in view of their Category 2 contributions might differ from the actual number of officers later provided for secondment to Frontex. However, no recovery mechanism is available in such cases, as the only condition for receiving the support is increasing the overall border guard staffing in the year concerned[191]. These shortcomings make the system particularly inefficient[192].

The amount of financial support is also an issue[193]. Correction coefficients, which do not properly account for changes in the cost of living, can sometimes lead to insufficient reimbursement, where

[181] Survey of national authorities (7 out of 27 – Open question).
[182] Interviews with Frontex Capabilities Division, Frontex Information Management Division and Croatian authorities.
[183] Survey of national authorities.
[184] Interviews with Frontex standing corps.
[185] Interview with Frontex Capabilities Division.
[186] Interviews with Frontex Information Management Division and national authority. See also Problem 3, unsystematic training recognition in national career progression.
[187] Survey of national authorities.
[188] Article 61(1) of the EBCG Regulation.
[189] Survey of national authorities: 67% (16 out of 24 respondents from 15 Member States) selected 'simplifying administrative procedures for reimbursements' as a solution that would improve the efficiency of the financing system under Article 61.
[190] For instance, Member States affected by the enlargement of the Schengen area relocated staff involved in border activities to other authorities owing to the reduction of their external border, therefore reducing the overall number of their national border guard staff.
[191] See Case Study on Standing Corps Capability Development, Annex 6 to the study accompanying the Impact Assessment.
[192] Frontex (2025). Input to the IFC feasibility study conducted on behalf of the European Commission in the framework of possible amendments to Regulation 2019/1896.
[193] The compensation is calculated on the basis of the annual salary of a contractual agent in Function Group III, grade 8, step 1, adjusted using a correction coefficient for each Member State. See Case Study on Standing Corps Capability Development in the Annex to the study accompanying the Impact Assessment.

Member States are left to cover the outstanding costs of Category 2 and 3 deployments[194].

**Shortages of certain profiles in the standing corps.** The standing corps' effectiveness is limited by persistent shortages of deployed officers with the specialist profiles needed by the Member States' for operations. Currently, among Category 1 statutory staff, the profiles with shortages are advanced-level document officers (ALDOs), debriefing officers, officers in European coast guard roles, information officers, and motor vehicle crime detection officers (Figure 2). Recent Frontex Joint Operation (JO) evaluation reports confirm these trends and highlight that there is also low coverage (below 50%) for dog handlers[195]. Member States have also flagged up non-existent or insufficient capacity for cultural mediators and translators, border-control experts, and returns procedure and return operations specialists[196]. The return-related specialist profiles need to be diversified further, including reinforcement and streamlining of return liaison officer deployments, so that Frontex can meet Member States' growing needs given EU policy priorities in this field.

Figure 2: Overview of deployable Category 1 standing corps officers as of 31/12/2024

| Profile | Nominated | MB Decision | Coverage |
|---|---|---|---|
| Advanced-level document officer | 64 | 100 | 64% |
| Debriefing officer | 85 | 95 | 89% |
| European coast guard functions officer | 1 | 14 | 7% |
| Information officer | 29 | 64 | 45% |
| Motor vehicle crime detection officer | 37 | 54 | 68% |

*Source: ICF, based on Frontex Implementation Report 2024*

The issue of profile shortages is also closely related to Member States' training infrastructure constraints, Frontex's own standing corps-focused training, and the fragmented implementation of strategic and operational planning across the EBCG. All of these aspects are addressed in more detail under Problem 3. Currently, the recruitment of specialised officers relies heavily on Member States' capacity to recruit, train and second officers[197].

**Limit on Frontex support and monitoring staff**. The structure of the standing corps includes non-deployable statutory staff that can be recruited by Frontex 'for the purpose of carrying out supportive or monitoring functions for the establishment of the standing corps, the planning and management of operations and the acquisition of technical equipment'[198] (operational support staff). This number is limited in the EBCG Regulation to up to 4% of the 10 000 officers (400 in 2027). As of January 2026, the operational support staff category has a total of 292 statutory staff (240 operational support posts and 52 fundamental rights monitors)[199], both included in the 4% group.

Any increase in Frontex operations will have an impact on additional resources as regards support and monitoring staff. It is expected that by 2027Frontex's operational footprint will exceed its back-office coordination capacity (Frontex plans to recruit approximately 1 000 additional Category 1 operational staff in 2026-2027, while the targets for Category 2 secondments and Category 3 nominations are also expected to increase by 500). This might make it difficult to accommodate the increased technical,

[194] ICF (2023); Study supporting the evaluation of the EBCG Regulation (EU) 2019/1896 and the review of the Standing Corps p. 110, p. 155; Survey of national authorities.
[195] Frontex (2025) Frontex Evaluation Report: Joint Operation Terra; Joint Operation Italy; Joint Operation Bulgaria.
[196] Field mission to Italy in the context of the study accompanying the Impact Assessment; Survey of national authorities.
[197] Interviews with Frontex Capabilities Division, Frontex Information Management Division and national authorities.
[198] Article 54(7) of the EBCG Regulation.
[199] Frontex recruitment and staff figures, overview as of 31/1/2026.

logistical and planning requirements that come with the increased capabilities beyond 2027[200].

Despite the progressive decentralisation of certain roles to contingent-level cross-cutting structures, HQ coordination and logistics capacity will remain essential for the entire Agency[201]. The ceiling set for operational support staff, which is already at over 70% of the overall capacity, therefore increases reliance on Category 1-3 officers performing certain cross-cutting duties.

Two key issues can be flagged up concerning the 4% limit on operational support staff.

- The 4% cap set by the EBCG Regulation will hinder Frontex's ability to provide logistical and monitoring support as it expands its operational scope[202.] Moreover, Frontex's divisions compete for resources within the operational support staff cap.
- The scope of the duties covered by the 4% ceiling is unclear. The Regulation does not specify the tasks that can be assigned to support staff and there is no consolidated list of duties classified as 'supportive or monitoring'[203].

### 2.2 Driver: challenges relating to technical equipment and logistic support

**A misalignment between planning and available resources**. The study accompanying the Impact Assessment collected evidence showing that there is a mismatch between planned technical equipment (TE) deployments and actual availability[204]. The under-deployment of key technical equipment, such as fixed-wing aircraft, helicopters and patrol vessels and boats is a prominent concern. Key causes include fluctuating operational requirements, overly ambitious planning targets, incomplete capability planning and legal or operational bottlenecks in the procurement and deployment processes. Seasonality trends in operational requirements further compound these challenges[205]. Data sharing and communication systems are often outdated and incompatible with those used by other agencies and Member States[206].

From the Member States' perspective, challenges related to pooling technical equipment for Frontex operations are often due to the structural difficulty of aligning domestic resource planning with EU-level commitments, as national technical equipment pools are typically tailored to national priorities and budget constraints[207].

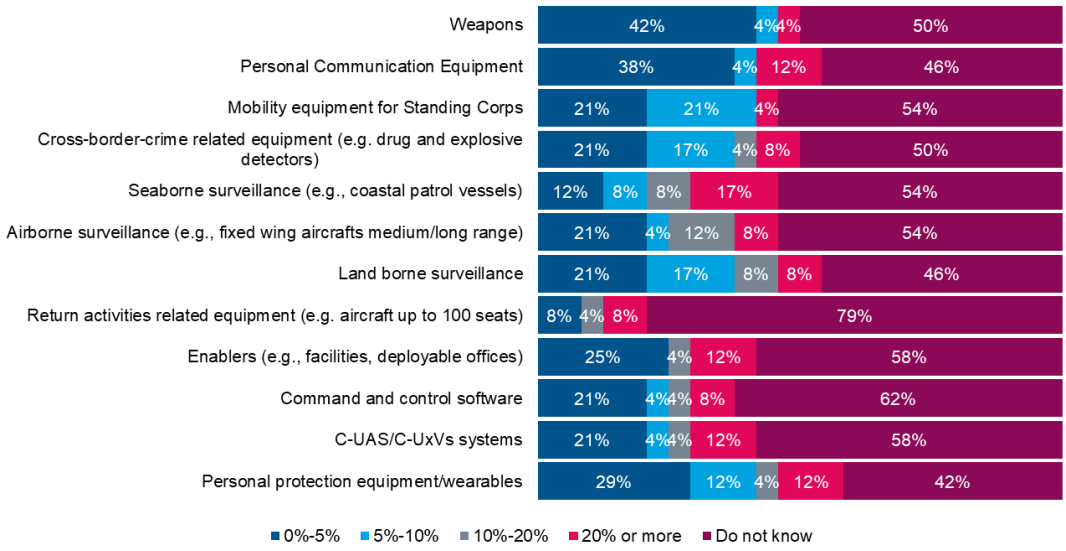
In practice, technical equipment for seaborne and airborne surveillance is the biggest challenge and these are the equipment categories for which Frontex has the greatest unmet needs, although, in the

[200] Interview with Frontex Operations and Capabilities Divisions and Frontex Equipment and Logistics Division.
[201] According to the Frontex recruitment and staffing overview of 31/3/2025, the Operational Support Division was expected to handle the administrative preparation for the deployment of 41% more officers, while working with fewer staff.
[202] Because the 4% ceiling is too low to cover all support and monitoring needs of a 10 000-strong standing corps, Frontex has progressively relied on 'operational horizontal activities' and 'operational horizontal functions' to fill the gap (Management Board Decision 17/2025 defines these as support and coordination functions performed by standing corps officers, at both central (HQ) and contingent level). These functions include roles such as operational coordination, return support activities, operational training and field logistics. The roles are filled by standing corps officers from Categories 1, 2 and 3, and recorded separately from the 4% statutory support staff. The 2025 HR recruitment and staffing overview shows that 360 standing corps officers (13.95% of the corps) were assigned to horizontal functions, of which 192 officers performed central-level activities and 168 served in contingent-level command teams.
[203] See Article 54(7) of the EBCG Regulation. Interviews with the Frontex Human Resources Unit.
[204] Interview with Frontex Equipment and Logistics Division.
[205] Frontex (2025). Eight New Contingent Commanders Graduate - Report on Capabilities to the Management Board.
[206] Interview with Frontex ETIAS Central Unit Division, Interview with Frontex Data Protection Office.
[207] Some Member States interviewed highlighted that the equipment they have does not always meet the operational needs of Frontex missions. A few noted that the fact that domestic needs can override commitments made under EU funding rules may create tension between national priorities and Frontex obligations. Others highlighted that deployment of equipment is often constrained by the availability of trained personnel, especially for maritime assets.

survey of national authorities carried out as part of the study accompanying the Impact Assessment, a large proportion of respondents were unable to provide an estimate[208]. Other relevant categories of equipment include ground-based surveillance equipment, personal communication equipment and C-UAS/C-UxV systems, and enablers.

Additional barriers identified in the 2024 evaluation of the EBCG Regulation[209] included the operational readiness of equipment procured through EU funding instruments such as BMVI. Technical equipment purchased under the ISF must be deployed in other Member States for a certain period of time, even if there is a Frontex Joint Operation in the same Member State. Failing to consider this technical equipment for deployment may lead to inefficiencies, given that it is already in the host country.

Figure 3: In your country, what percentage increase is needed in each of the currently available equipment categories to fulfil Frontex requests? (n=24)




*Source: Produced by ICF, survey of national authorities*

From the perspective of Frontex, uncertainty about the availability of national assets a year in advance, or lack of clarity on deployment locations, complicate internal planning for TEP technical equipment deployments[210]. Certain types of equipment are available in very limited quantities, which makes it difficult to fulfil both national requirements and EBCG obligations[211].

**Logistics**. Constraints in terms of logistics add complexity to deployments, affecting both the Member States and Frontex**.** Equipment, uniforms and weapons must be collected from limited, designated locations, increasing the need to travel for logistical purposes. This reduces time for operational tasks and disrupts workflow continuity. Persistent challenges concern weapons transportation, rental of unmarked patrol vehicles and insufficient provision for fuelling and maintenance[212]. In the interviews,

[208] Survey of national authorities (33% and 20% said that the increase would need to be more than 5%; 10 and 5 out of 24).
[209] ICF. (2023). *Study supporting the evaluation of the EBCG Regulation (EU) 2019/1896 and the review of the Standing Corps*.
[210] ICF. (2023). *Study supporting the evaluation of the EBCG Regulation (EU) 2019/1896 and the review of the Standing Corps*. This is particularly the case for helicopters, unmanned aerial systems and maritime surveillance equipment
[211] Ibid.
[212] Under the system in place from 2020 to 2022, Frontex added to its own resources with cars rented individually by officers. Given the high cost of that system, Frontex has transitioned to a centralised 'duty car rental' system. At present, owing to concerns about manageability and the lack of the required fleet-management tools, the Frontex fleet has been capped at 500 owned vehicles. This is despite the fact that transportation vehicles are required by at least 50% of the deployed Category 1 and Category 2 officers to travel from their accommodation to their place of work (border crossing

Member States also highlighted deployment inefficiencies caused by transportation and maintenance costs[213].

Frontex's approach to date has been to retain a small logistical footprint by leasing or contracting services and minimising ownership[214.] This can be explained by the absence of EU-wide recognition mechanisms for vehicle roadworthiness tests, firearm permits and insurance procedures, which has forced Frontex to navigate fragmented national systems across the EU. Moreover, according to Frontex staff, the procurement rules impose extensive legal compliance requirements. Retaining a small logistical footprint has enabled Frontex to avoid these limitations and develop its operational portfolio relatively quickly, while minimising the burden of managing maintenance, facilities, infrastructure and human resources throughout the equipment's lifespan[215].

On the other hand, existing gaps in the technical equipment pool for larger items mean that Frontex is required to develop its own technical capabilities, especially for aerial and maritime assets. However, there are significant challenges, including the complex legal framework and high logistical and financial costs[216].

**Joint procurement and procurement on behalf of Member States**. While joint procurement is a possibility explicitly mentioned in the EBCG regulation, the current EU legislative framework does not give Frontex the power to act as a central contracting authority or a central purchasing body on behalf of national border agencies or in their name[217]. In order for a decentralised agency such as Frontex to undertake joint procurement with a Member State (where permitted under the EU financial rules) or to act as central purchasing authority on behalf of Member States, its founding regulation must provide an explicit legal basis for these activities. In addition, it must include provisions regarding crucial aspects such as fees for these services and limitations on liability to avoid exposing the EU budget to excessive risks. It should also include provisions to prevent double funding by Member States through both the EU budget and fees for procurement services[218].

Nevertheless, only a minority of respondents to the survey of Member States' authorities support joint procurement, but this varies greatly depending on the type of equipment. Joint procurement of airborne, ground-based and seaborne surveillance equipment received the most support from national authorities[219], while joint procurement of weapons[220] and other personal equipment received the least

point or regional/local border police headquarters) and/or for transporting migrants/returnees. To achieve efficiency gains, Frontex should actively develop its fleet management capabilities. However, at present this is dealt by a small unit, and the fleet management service is outsourced to a private party. Interview with Frontex Equipment and Logistics Division; Interview with Frontex Contingent Commander Bulgaria.

[213] Interviews with National Authorities.

[214] Frontex. (2023). *Management Board Decision 28/2023 of 15 September 2023 adopting the Multiannual Strategy for the Acquisition and Management of the Agency's Equipment*. In 2023 Frontex adopted its first Multiannual Strategy for the Acquisition and Management of the Agency's Equipment. The strategy outlines a long-term plan to improve the availability and reliability of core assets, while also enhancing efficiency in procurement processes. It sets out plans for a gradual scaling-up of portable and personal equipment in parallel with the expected increase in staffing levels. The strategy reflects the constraints imposed by the current legislative framework and the budgetary ceilings set by the current MFF. It also considers the possibility of identifying synergies and opportunities for collaboration with national authorities, including on joint procurement, something which has not been explored so far.

[215] Interview with Frontex Equipment and Logistics Division; Interview with Frontex Operations Divisions and Units (DED OPD); Interview with Frontex Contingent Commander Italy and Malta.

[216] Interview with Operations Divisions and Units - DED OPD.

[217] Article 9(7) of the EBCG Regulation allows Frontex to identify synergies and invite Member States to cooperate, including through joint procurement. However, Article 90 of the EBCG Financial Regulation and Article 168 of the EU Financial Regulation only permit joint procurement in limited cases (i.e. specifically for administrative needs with host Member States or for duly justified operational needs) requiring detailed agreements on procedures, applicable law and dispute resolution.

[218] Interview with DG BUDG.

[219] Survey of national authorities (44%, 42% and 37%; 10, 10 and 9 out of 24).

[220] Survey of national authorities (21%; 5 out of 24). 29% disagreed or strongly disagreed.

support.

**Aerial surveillance**. The recent EUR 184 million four-year contract for aerial surveillance services[221] has raised questions about the efficiency of renting, versus owning, equipment. The data from Frontex's framework contracts for aerial surveillance indicate that Frontex has spent around EUR 20 million per year on renting Remotely Piloted Aircraft Systems (RPAS) and approximately EUR 30 million on fixed-wing aircraft (FWA)[222]. Although this approach is costly, Frontex argues that it is more financially advantageous than outright acquisition, and provides flexibility, circumventing the restrictive regulations that apply to non-commercial planes flying across different national airspaces. According to Frontex, although owning aerial equipment could pose a risk to operational responsiveness due to the regulatory constraints mentioned above, greater uniformity in procurement could offset the costs[223].

However, Frontex's own cost modelling indicates that, over a long enough period of time, purchasing surveillance aircraft can become more economical than leasing. For example, a simulation by Frontex shows that acquiring a new crewed low-altitude turboprop surveillance aircraft would cost about EUR 3.75 million in year 1, rising to approximately EUR 34.3 million by year 4 and then stabilising at EUR 11.7 million per year. This amounts to roughly EUR 151 million over 11 years. Industry interviews show that, beyond approximately 10-12 years of use, outright purchase typically results in net savings over leasing. Therefore, these findings suggest that, despite high upfront costs, an 'own asset' approach could reduce average annual costs in the longer term.

**Maritime assets.** Frontex currently does not own or operate any maritime assets, such as vessels. This is due to the legislative complexities of registering and operating vessels. Under international maritime law, a vessel is subject to the exclusive jurisdiction of the state under whose flag it flies, and maritime vessels must fly the flag of a nation state. This means that the ship's home nation has the power to enforce its laws on the vessel and its crew, regardless of their location on the high seas ('flag state jurisdiction')[224].

Another factor hindering the development of seaborne capabilities is the significant financial resources required to operate ships. As with aircraft, maritime vessels require significant logistical support and infrastructure for operations and maintenance, including a range of specialists, naval bases/docking facilities and shipyards for maintenance.

## 3. Problem drivers relevant for Problem 3

### 3.1 Driver: the needs of EIBM cannot be sufficiently addressed by the current training framework

**Limitations of the common core curriculum model**. The EU-level framework for harmonising professional standards in border management, based on the Common Core Curriculum for Border and

[221] EU Funding & Tenders Portal.
[222] See the Annex on the cost assessment for a more detailed presentation of these data.
[223] Interview with Frontex Equipment and Logistics Division.
[224] Over the past few decades, the European Union has made several attempts to create a single European flag. However, these attempts have so far been unsuccessful. In 2023, the European Commission launched a new study with the objective of proposing an attractive European flag comparable to those of other international registers, but with enhanced social and environmental conditions; European Commission. (2023). *Call for tenders. Study on Flag State Responsibilities and 'Open Registers' for Vessels Registration*. Available at: https://cinea.ec.europa.eu/funding-opportunities/calls-tenders/study-flag-state-responsibilities-and-open-registers-vessels-registration_en#:~:text=It%20announced%20the%20European%20Commission,LinkedIn. Even if a mission pennant were used, which could provide some degree of clarity for assets and personnel deployed on vessels, most operations take place in international waters, outside territorial seas, and may involve third countries that have not acceded to the relevant international conventions (Turkey has not signed UNCLOS Convention).

Coast Guard Training (CCC Basic and CCC Mid-level Management Training CCC-ML)[225], is not accompanied by any enforcement tools[226].

While the 2024 evaluation of the EBCG Regulation found that differences in training standards reduced consistency of operational performance and undermined the effectiveness of joint deployments[227], this was not confirmed by the national authorities in the survey carried out for the study accompanying the Impact Assessment[228].

**Insufficient coverage of return-related tasks**. There is no dedicated CCC for return-related tasks, despite this being a legal obligation[229]. The CCC Basic includes only limited modules on return support[230] leaving tasks such as escorting, counselling, monitoring and coordination to be addressed through nationally designed programmes[231]. However, the standing corps officers participating in a survey expressed a need for more structured EU-level return training[232].

**Too few practical exercises**. Current training schemes provide few opportunities for structured, cross-border joint exercises, which are essential for developing interoperable competences and mutual understanding among national contingents. Survey data indicated strong demand for EU-level practical training formats[233]. According to Frontex officials, the lack of a regulatory mandate limits opportunities to test and improve interoperability in the field[234].

**Poor integration with EU capability planning and operational needs**. While Frontex operational training is increasingly linked to capability planning, the CCC uses an independent revision process which is not systematically aligned with the EU-level capability planning framework or national capability development processes (NCDP). National training institutions do not consistently use NCDPs to plan training, highlighting a disconnect between strategic planning and practical implementation.

**Scope and quality of training for Category 1**. The 2024 evaluation of the EBCG Regulation found the quality and consistency of Category 1 training to be uneven, with significant gaps in specialised capabilities and practical preparedness. Since its launch in 2020, the basic six-month course for Category 1 has been expanded and extended in duration and is now the Operational Training Programme (OTP), with profile-specific modules and leadership components. Levels of participation by standing corps officers in specialised training have grown steadily[235], but views on the training are mixed. While 35% of standing corps officers that took part in a survey strongly agreed that basic

[225] Developed in collaboration with Member States, fundamental rights bodies and international partners.
[226] Article 62(6) of the EBCG Regulation formally requires Member States to integrate the CCC into their training programmes. However, the results of the survey carried out for the study accompanying the Impact Assessment show that, in practice, Member States have discretion in terms of how and to what extent they include the CCC Basic and CCC-ML in their training.
[227] Ibid.
[228] 27% of respondents agreed that variations between standing corps officers and national staff have caused difficulties in joint operations, while 43% neither agreed nor disagreed, and 16% disagreed.
[229] Article 62(6) of the EBCG Regulation.
[230] Interview with Frontex EBCG Academy.
[231] The findings of a survey of national authorities show that 67% of training academies (12 out of 19) deliver return training mainly as part of continuous or in-service professional development, making this the most common approach.
[232] 70% of respondents endorsed the introduction of additional return-related training and information provision. ICF survey of standing corps officers.
[233] ICF survey of national authorities. A majority of national academies (58%, 11 out of 19) highlighted joint operational exercises as one of the areas where Frontex's centralised training could most effectively complement national systems and pointed to scenario-based deployment training.
[234] Interview with Frontex EBCG Academy.
[235] With 1 174 participants in 2021, 1 194 in 2022 and 1 817 in 2023.

training enabled them to carry out their duties effectively, 41% considered it sufficient only to a certain extent, and 1 in 5 stated it was adequate to a limited extent or not at all.

**Scope and quality of training for Categories 2 and 3**. Frontex's training activities have mainly targeted Category 1 officers. In the 2024 evaluation of the EBCG Regulation, Member States reported a lack of training opportunities for Category 2 and 3 officers, highlighting persistent gaps in both access to and quality of training for these two categories[236]. Member States underlined that Category 2 and 3 officers also require more targeted and structured training. Furthermore, Category 3 officers often do not receive pre-deployment training and rely entirely on ad hoc peer support in the field. Survey evidence supports these concerns, with 80% of standing corps respondents agreeing that there is a need for a common pre-deployment training programme coordinated by Frontex on European border management and operations. Meanwhile, 79% agreed that there is a need for pre-deployment training specifically targeting national authorities.

**Unsystematic recognition of training in national career progression.** The 2024 evaluation of the EBCG Regulation did not explicitly examine training recognition, but it noted systemic barriers to career continuity for standing corps officers. In many Member States, officers must resign from their national services to join Frontex, leading to the loss of career entitlements. Evidence from surveys conducted as part of the study accompanying the Impact Assessment confirms that recognition of Frontex training remains limited[237]. Moreover, 87% of officers indicated that they had received no institutional career benefits from completing Frontex training, with only a few isolated cases of promotion, new assignments or increased responsibilities being reported. National authorities confirmed this picture. In addition, only eight Member States indicated that Frontex training is integrated into national qualification frameworks, while over half (57%) reported that it is not.

Consequently, there is strong demand to change the current practice: 79% of standing corps respondents considered it would be valuable for Frontex training to be formally recognised for national promotions or professional advancement, with 54% rating this as 'very valuable.'[238]

**Infrastructure constraints**. Until recently, Frontex relied primarily on Member States' partnership academies to host its training activities. With the gradual roll-out of the EBCG Academy concept, Frontex intends to move towards a more centralised delivery model for standing corps Category 1 training, while Member States are expected to continue supporting specialised modules through the emerging network of Specialisation Training Centres. In addition, in the future, tactical training should be provided closer to the operational field, at the level of Contingents.

Despite this shift, structural challenges remain. The increasing amount of training required to meet standing corps targets has intensified pressure on the overall training system[239]. Survey evidence

[236] According to the survey conducted for the study accompanying the Impact Assessment, for Category 2 and 3 officers, 40% of Member State respondents agreed that the general training provided meets their operational needs, while a combined 47% either expressed no clear opinion or disagreed. The pattern is similar for specialised profiles, with just 26% of respondents agreeing that specialised training is adequate for Categories 2 and 3, compared to 24% who disagreed or strongly disagreed.

[237] Among standing corps respondents, 44% reported that their training was not formally recognised, though it contributed to professional development, while only 11% stated that it was recognised under a national qualification framework and 10% that it was included in personal development planning. A quarter of respondents (25%) did not know whether their training was recognised at all.

[238] The 2024 evaluation of the EBCG Regulation highlighted that career ambition was a key driver for joining the standing corps (cited by 65% of Category 1 officers), yet the lack of recognition undermines long-term professional development for both statutory and seconded staff.

[239] Between 2024 and 2026, the number of standing corps officers is set to rise substantially – Category 1 officers will go

confirms that this growing demand continues to outpace available capacity. 84% of training academies (16 out of 19) reported that they did not have the facilities to host additional activities, and 68% (13 out of 19) highlighted that competing national priorities or already full training calendars restricted their capacity to accommodate Frontex requests[240].

**Scarcity of trainers.** The lack of a stable, dedicated pool of instructors for Frontex is another core constraint that hampers training delivery. While currently the overall concept for trainers includes four different categories[241], Frontex continues to rely primarily on trainers provided by the Member States or its own staff who act as trainers. However, highly qualified national trainers are often unavailable due to competing operational duties and limited financial incentives, compounded by limited advance coordination with national training coordinators on scheduling and availability. Survey evidence confirms that staff capacity continues to be one of the main bottlenecks[242].

In parallel, no dedicated trainer role exists within the standing corps. Under the EBCG Regulation, standing corps officers are assigned to border, migration management or return teams for operational activities, leaving little scope to establish permanent training posts and to build a stable and dedicated internal pool of trainers, especially operational practitioners capable of delivering practical modules. Despite attempts to temporarily overcome these shortcomings[243], this continues to be a bottleneck.

### 3.2 Driver: fragmented strategic and operational planning and limitations in quality control

**Fragmented implementation of strategic and operational planning**. Frontex strategic planning is constrained by poor coordination and the uneven maturity of national planning. The absence of a legally binding requirement for Member States to align their national strategies with the Technical and Operational EIBM Strategy limits Frontex's ability to oversee implementation, as it lacks the authority to enforce compliance or trigger corrective measures in cases of underperformance. This gap also negatively impacts the ability to draw up a coherent and forward-looking capability roadmap.

Despite efforts by Frontex to provide templates, guidance and methodological support for the preparation of national strategies for EIBM, the overall maturity of national planning remains uneven. Many national strategies are still not fully linked to recruitment cycles, force generation processes (i.e. personnel mobilisation to make staff available for deployments) or capability development planning. Frontex's strategic planning is constrained by the absence of timely or comprehensive data from Member States, with several national capability development plans being delayed and classified contingency measures being unavailable to Frontex. Moreover, coordination of strategic and operational planning between Frontex and Member States/Schengen Associated Countries remains poor – there is no formal mechanism to synchronise timelines, assess progress or ensure harmonised implementation of EIBM priorities.

**Insufficient integration of risk-analysis products into planning cycles**. A further gap concerns the

from 1 000 to 1 873, Category 2 from 750 to 1 250, and Category 3 from 4 250 to 5 250 – further increasing the need for training infrastructure.

[240] Capacity data illustrate the same pressures – in 2023, four academies reported 100% use of their training centres, while others operated at between 50% and 90% occupancy, with some projecting further increases by 2025.

[241] Member State trainers, staff from headquarters and standing corps Categories 1, 2 and 3 acting as trainers, as well as external experts. Frontex: Explanatory note on the concept of trainers for the European Border and Coast Guard Academy, Ares(2026) 233415 (9/1/2026).

[242] 89% of national academies (17 out of 19) reported limited availability of training staff as a barrier to scaling up cooperation with Frontex; at the same time, many institutions expressed willingness to help – 84% (16 out of 19) indicated they could contribute trainers or subject-matter experts, suggesting willingness outstrips practical capacity.

[243] Frontex: Explanatory note on the concept of trainers for the European Border and Coast Guard Academy, Ares(2026) 233415 (9/1/2026).

limited integration of Frontex's risk-analysis products into strategic and capability planning cycles. Despite the legal obligation[244] requiring risk analyses to cover all tiers of EIBM to enable pre-warning and preparedness, current outputs largely focus on migratory flows at external borders, with insufficient coverage of returns, third-country conditions and intra-Schengen movements. This narrow scope is delaying the full implementation of EIBM and reduces the relevance of risk analysis for forward-looking capability development.

As highlighted in the 2024 evaluation of the EBCG Regulation, there is no shared understanding of how risks linked to returns should be measured, resulting in significant information gaps. Interviews carried out for the study accompanying the Impact Assessment also emphasised the need to bolster Frontex's 'intelligence function' i.e. forward-looking analysis capability by linking horizon-scanning and field data with capability needs, as this would transform risk analysis into a strategic decision-making tool.

In the absence of an integrated forward-looking framework, there is no systematic link between operational risk analyses and capability development planning. The lack of a clear policy framework and division of roles, both at headquarters and in the field, makes it difficult to ensure that operational planning cycles are information-led and mutually reinforcing. The Management Board's role in steering long-term planning has also been described as reactive, further weakening collective accountability for shared capability development under the EBCG framework[245].

**Limited scope of vulnerability assessment recommendations and insufficient follow-up.** Vulnerability assessment offers a one-sided view of the situation at the external borders, but there is no early warning system allowing structural gaps to be identified and ensuring smoother alignment with EIBM standards in EU candidate countries ahead of accession. Moreover, the vulnerability assessment does not include return.

The enforcement of recommendations issued through the vulnerability assessment process is incomplete in practice. While most of the recommendations are implemented on time thanks to the cooperation between Frontex and the Member States concerned, there are a number of vulnerabilities that have been present for years. The formal escalation pathway under the EBCG Regulation[246] is rarely used and considered sensitive[247].

# ANNEX 6: ADDITIONAL INFORMATION ON SELECTED DRIVERS – RETURNS

Frontex is a key operational player in the area of returning people from the EU to third countries and it provides Member States with technical and operational support. However, the current mandate has its limitations, and as such Frontex is not realising its full potential. In the Commission's view and as outlined in the impact assessment, there is a clear need for Frontex to play a greater role in returns. This view has been expressed by the Member States on multiple occasions[248].

[244] Article 29(3) of the EBCG Regulation.
[245] Feasibility study supporting this Impact Assessment – interview findings.
[246] Article 42 of the EBCG Regulation.
[247] To date, the first step of the escalation procedure, where the Management refers instances of non-compliance to the Commission and Council, has been applied in only a few cases. The second step of escalation, where the Commission proposes action from the Council, has not been used once.
[248] Future of Frontex: main results of the discussions held at the Management Board meeting on 20 October 2025.

The Commission believes that, in the context of the recent Regulation establishing a common EU system for the return of third-country nationals staying illegally in the Union, Frontex's role in relation to returns also requires a review to give it a greater role and more capacity to provide operational support, including in terms of staffing and budget, while retaining Frontex's obligation to ensure that EU law and international standards are upheld fully throughout the return process.

This need for a review is a consequence of the following shortcomings and gaps which have been identified.

*a) Structural gaps in governance of returns, planning and strategic assessment of returns*

**Shortcomings in governance**. As identified in the 2024 Evaluation, the national authorities responsible for return activities have so far not been properly integrated into the Frontex governance framework (e.g. Management Board)[249]. Management Board members are almost never responsible for return-related activities, given that, in many Member States, the responsibility for returns is spread across multiple institutions, making it difficult to identify a single point of reference at national level. Frontex's governance of returns, resources and planning systems has not kept pace with policy requirements. While the governance of returns is supported by the 'High-Level Round Table on Returns' working group, it lacks formal decision-making powers. Furthermore, even though the High-Level Round Table on Returns is supposed to provide the Management Board with strategic points on return, effective follow-up is often hampered by the fact that the sitting Management Board members lack the appropriate mandate or decision-making power.

**Lack of synergies**. While Member States provide regular statistics[250], there is no forward-looking reporting and planning mechanism or system[251] which could allow Frontex to identify potential opportunities to further extend its support to Member States in line with EU policy priorities; this makes return operations reactive and fragmented. Information on Member States' operational return capacity (e.g. numbers of return counsellors or detention centre capacity), emerging trends (e.g. anticipated volumes of upcoming returns) or compliance with best practices (e.g. the RECAMAS reference model) is not systematically available to Frontex.

Data is exchanged on a case-by-case basis[252] and there is no obligation to cooperate with Frontex. This has an impact on the existing possibility for Frontex to coordinate or organise return operations on its own initiative (with the agreement of the Member State concerned)[253].

Differences between national and Frontex procedures often require internal changes to align processes, creating a double layer of administrative requirements[254]. This can offset the financial benefits of using

[249] Interviews with: Frontex Return Division; DG MENA; DG INTPA; DG HOME; national authorities; European Commission (2024) Commission Staff Working Document. Evaluation report from the Commission to the European Parliament and the Council: eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024SC0075.

[250] National statistics are provided on a regular basis, for example on the number or return decisions issued and the number of effective returns.

[251] The Integrated Return Management Application (IRMA) is a platform operated by Frontex based on Article 49(1) of the EBCG Regulation to facilitate the exchange of information between Member States, Schengen Associated Countries, Frontex and other EU bodies and agencies. However, it is not sufficient and, in practice, until a request is made by a Member State, Frontex has no clear overview of Member States' needs for a given period. Interviews with the Frontex Return Division for the purpose of the study revealed that, typically, Member States provide return-related data via IRMA when they request specific support from Frontex, at which point a needs assessment is conducted to understand the Member States' technical and operational needs.

[252] Interview: RET Division and C1.

[253] CF (2023) Study supporting the evaluation of the EBCG Regulation and the review of the standing corps; Interview with Frontex Return Division.

[254] Interviews with national authorities.

Frontex services, as national authorities must maintain parallel systems to comply with both national and Frontex rules. For example, as highlighted by some Member States, there are differences in the model applied to cash assistance on reintegration (before departure or upon arrival). This can, for instance, create difficulties in terms of putting beneficiaries with different types of assisted voluntary return on the same charter flight. Furthermore, it often causes Member States to rely on long-standing partners such as IOM, whose programmes can be more flexible.

**Vulnerability assessment.** Finally, return-related capacity and needs are not part of the vulnerability assessment of the EU's external borders[255], even though the EBCG Regulation[256] requires Frontex to monitor trends not only in migration flows and external border threats but also in the field of returns[257]. The second quality control mechanism, the Schengen Evaluation and Monitoring Mechanism (SCH-EVAL), does make provision for return-focused evaluations, but evaluations occur only once every seven years and focus primarily on the functioning of national return procedures to support the overall Schengen *acquis*, without assessing preparedness in terms of staff, infrastructure and budget and with no contingency planning specifically for returns[258].

*b) Operational gaps in Frontex support for returns, including capacity constraints for specialised return staff and return monitoring*

Despite the fact that Frontex's role in return operations has grown in recent years, the effectiveness of Frontex in this area is constrained by a range of operational, legal and structural challenges that limit its ability to provide consistent and coordinated support to the Member States.

**Logistics**. Logistical and escorting challenges hinder the smooth organisation of returns. Member States face difficulties in using the Frontex Application for Returns (FAR) system due to its administrative complexity, strict rules on the number of return escorts and limited flexibility in terms of route selection, which often prioritises the cheapest flights over operational feasibility. Transporting returnees across Member States to reach departure airports or organising connecting flights via other EU airports require special permissions and coordination with transit countries. To make the border procedure fully operational, Frontex should be empowered to assist with the transport of returnees during the return process (e.g. from the border area to the airport; from the border area to the consulate for identification purposes); this might include the provision of videoconference equipment for identification purposes, etc.

**Fragmentation**. Return contingents currently operate separately from other Frontex deployments, with minimal coordination of logistics and administration, causing confusion for national authorities and leading to inefficiencies.

**Lack of interoperability between digital systems**. There is limited interoperability between the Frontex-managed systems (IRMA and FAR) and the Commission-managed system (RIAT), as well as national or third-country digital systems and case-management tools. This hampers the seamless exchange of return and reintegration data, requiring Member States to maintain parallel systems for return, reintegration and readmission.

**Access to the Schengen Information System (SIS).** Frontexdoes not have general access to the SIS. For return purposes, the standing corps currently has access to SIS only under the authority of a

[255] Under Article 32 of the EBCG Regulation, the vulnerability assessment is a mandatory, continuous mechanism through which Frontex evaluates each Member State's capacity to manage the external border.
[256] Article 29 of the EBCG Regulation.
[257] Interview with Frontex Return Division, interview with DG HOME.
[258] Feedback from first expert workshop, Interview with Frontex Return Division: emerging vulnerabilities in national return systems – such as increasing absconding rates, insufficient detention capacity or lack of staff for voluntary return counselling – often go undetected and unaddressed at EU level.

Member State in which they are deployed. Frontex does not have access to the SIRENE[259] channel or the additional information exchanged there. This hampers smooth interaction with Member States, which are responsible for entering and managing alerts on returns, and makes Frontex action in third countries more cumbersome.

**Data transfer limitations**. Under Chapter V of the Data Protection Regulation for EU institutions (EUDPR), the transfer of personal data outside the EU is strictly regulated. The EBCG Regulation[260] provides a legal basis for personal data transfers that is strictly limited to return-related contexts and when data sharing is necessary for operational purposes[261]. In practice, there are very few international agreements or other appropriate safeguards in place that could serve as a mechanism for transfers.

As a result, most transfers rely on a derogation on the grounds of 'important reasons of public interest.'[262] However, this derogation is intended to be used only as a last resort, and the current interpretation is that it is to be used only on a case-by-case basis, and does not provide the predictability or legal certainty required for consistent, large-scale return operations. This leads to operational delays and limits Frontex's ability to effectively support Member States. For instance, without reliable mechanisms for routine data transfers, processes such as obtaining travel documents or conducting identity verification with third-country authorities are hampered or delayed. This limits Frontex's operational capacity and creates uncertainty in its cooperation with third countries on returns[263]. The Return Regulation aims to mitigate these issues through its provisions on return-, readmission- and reintegration-related data transfers to third countries.

**Challenges related to identification**. In 2024, return specialists made 1 089 requests for emergency travel documents, identification or travel documents[264] and 34 identification[265] mission needs were approved. Frontex also developed good practices on identification and acquisition of travel documents. Member States see the added value in Frontex's involvement in identification[266]. However, Frontex's current mandate in the field of identification of third-country nationals sometimes prevents authorities in the Member States from requesting Frontex's operational support. This applies to cases which, by virtue of the national legislation, require the same authorities to proceed with identification or documentation of the person throughout the process and therefore the consular authorities need to be involved prior to the issuance of return decisions in relation to which Frontex can in principle not provide support. Coordination between Member States and Frontex in dealing with third-country authorities is often inconsistent, sometimes leading to duplicated efforts or inefficiencies (e.g. the third country or the organising Member State may invoke internal rules prohibiting Frontex from observing interviews). Due to slow coordination between Member States, joint identification missions organised by Frontex are sometimes delayed or cancelled. There are not enough European return liaison officers

[259] SIRENE stands for Supplementary Information Request at the National Entries in the context of SIS.
[260] Article 88(2)(b) of the EBCG Regulation.
[261] Interview with Frontex Return Division.
[262] Art. 50(1)(d) of the EUDPR.
[263] It should be borne in mind that Member States also encounter similar issues themselves, and this is not an isolated issue encountered by Frontex, although in this case the issue stems from mirroring provisions in the General Data Protection Regulation (GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, OJ L 119, 4.5.2016, pp. 1).
[264] Frontex, Consolidated Annual Activity Report 2024.
[265] Identification refers to the process of confirming a returnee's nationality and identity so that the necessary travel documents can be issued for their return to their country of origin. This is often done through identification missions by third-country authorities to the EU, where representatives of those authorities meet with Member State authorities in person to verify identities and facilitate the issuing of documents. See Frontex, Return operations, available at: https://www.frontex.europa.eu/return-and-reintegration/return-operations/returns/.
[266] According to the survey (open-ended responses under Q61 – 3 out of 21) and interviews with national authorities, identification missions have proven highly valuable for procuring travel documents, with Frontex support enabling Member States to pool resources and carry out more missions overall.

(EURLOs). Moreover, their role and the rules governing their deployment, including their selection and physical office/presence in third countries (by default they are posted to the diplomatic mission of their Member State of origin) need to be reviewed in line with EU policy priorities. The effective operation of the return border procedure[267] requires enhanced support for identification, including logistics, deployment of short- and long- term identification missions, capacity building of third countries, including purchase (and not only 'loans') of equipment necessary for identification.

**Staff shortages**. Frontex is facing shortages of specialised return staff, with uneven national capacities and reliance on voluntary Member State contributions, unpredictable deployments and limited ability to deliver consistent, high-quality support for return-related activities, including return operations. The shortages concern in particular the return specialists (RSs) and Frontex return escort and support officers (FRESOs). They are essential for delivering return counselling, providing ground and escorting support, and ensuring that return operations are carried out in compliance with applicable fundamental rights standards[268]. For example, the limited availability of FRESOs hampers the streamlined organisation and support of returns by commercial flights with a stopover in a Member State. Currently, in most cases Member States and Frontex have to use direct flights only. This limits Frontex's scope to assist with returns. In addition, innovative staff categories necessary for Frontex to match the EU policy ambition on returns outlined above are currently missing from the standing corps. These staff categories include, for example, return case managers, return cultural mediators, return digitalisation experts, interpreters and specialist profiles to deal with returnees who are vulnerable, who pose a security risk or who have specific medical issues.

Adequate staffing is also a challenge for the return monitoring framework (see below).

With the return border procedure applicable as from June 2026, Member States' support needs will be of a different nature and will generally increase. Frontex is currently not adequately equipped to fulfil related key operational tasks.

Number of dedicated return staff currently employed by Member States

| Member State | Return specialists | Specialised vulnerable person escorts | Return monitors | Return counsellors | Other voluntary return specialists | Fundamental rights monitors | Readmission specialists | Other return support staff (if relevant) |
|---|---|---|---|---|---|---|---|---|
| AT | 0 | 0 | 0 | 0 | 9 | 0 | 0 | 5 |
| BE | 7 | | | 1 | | | 2 | 4 |
| BG | 3 | 0 | | 3 | | | | |
| HR | 4 | 0 | 0 | 4 | 0 | 0 | 0 | 0 |
| CZ | 16 | 5 | | 16 | 2 | | | |
| DK | | | | | | | | 150 |
| FI | 300[269] | 20 | 3 | 5 | 5 | 3 | 5 | 15 |
| FR | 1 | | | | | | | |
| DE | 1 | 0 | 0 | 0 | 1 | 0 | 0 | 31 |

[267] Under Regulation (EU) 2024/1349 of the European Parliament and of the Council of 14 May 2024 establishing a return border procedure, and amending Regulation (EU) 2021/1148, OJ L, 2024/1349, 22.5.2024.
[268] According to the Frontex (2025) Consolidated Annual Activity Report 2024, in 2024, only 65% of the Member States' requests for deployment of return specialists were met due to lack of human resources, especially in Category 2.
[269] 300 police officers in Finland carry out forced returns from Finland. They are either escort leaders or escorting police officers.

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| EL | 8 | | | | 5 | | | |
| IS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LV | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LT | 16 | 0 | 3 | 16 | 0 | | 16 | |
| MT | 8 | 2 | 5 | 2 | 8 | 5 | 2 | |
| PL | 22 | | | 4 | | | 22 | |
| RO | 3 | 0 | 0 | 3 | 0 | 0 | 0 | 0 |
| SI | 4 | 10 | 2 | 26 | | | 4 | |

| Profile | Cat. 1 | Cat. 1 | Cat. 2 | Cat. 2 | Cat. 3 | Cat. 3 | Total days |
|---|---|---|---|---|---|---|---|
| | Total officers deployed | Total deployment days | Total officers deployed | Total deployment days | Total officers deployed | Total deployment days | Total deployment days (Cat. 1, 2, 3) |
| **Frontex return escort and support officer** | 50 | 18 227 | 29 | 10 535 | 282 | 2 684 | 31 446 |
| **Return specialist** | 12 | 4 673 | 19 | 6 711 | 81 | 5 129 | 16 513 |

*Source: Frontex Annual Implementation Report 2024*

Despite efforts to professionalise and expand the standing corps, demand for these specialised profiles exceeds the resources available. In 2025, operational needs for RSs and FRESOs rose by 3% compared with initial forecasts, but staffing gaps persisted. A total of 41 deployment periods for RSs were cancelled (28 by Frontex and 13 by Member States), while four RS posts and four FRESO posts remained unfilled as of May 2025. This reflects the ongoing challenge of maintaining adequate and predictable deployment levels across the EU[270].

Based on the survey carried out as part of the study accompanying the impact assessment, staffing capacity varies significantly across Member States. Some Member States report high numbers in specific roles, such as Denmark with 150 staff in other return support roles, while other Member States, such as Austria and Latvia, report very low or zero staffing in most categories[271]. Some countries demonstrate a more balanced distribution of staff across different functions, such as Lithuania and Malta, while in others, staffing is concentrated in just one or two categories.

Seven countries[272] identified specific shortages of return specialists, return monitors and readmission specialists, while four reported recruitment difficulties. The Czech Republic experienced the broadest challenges across multiple roles. Belgium and Germany, for example, highlighted shortages of return counsellors and monitors[273].

It is also important to note that figures from the Member States cover only specialised roles, such as

[270] Frontex (2025), *Assessment of Availability of Capabilities – Annex I: Report to the Management Board*, Ares (2025)4338489, 29 May 2025.
[271] Survey involving national authorities.
[272] Survey involving national authorities: BE, HR, CZ, DE, IS, PL, RO.
[273] Survey involving national authorities (10%, 2 out of 21).

return specialists, counsellors, monitors or escorts, and do not reflect the broader administrative and enforcement staff involved in return processes. National administrations involved in issuing return decisions, managing detention facilities, and general police or security personnel used for escorts are typically not included in the figures. This means that the real capacity available at national level is significantly higher than what is reflected in the survey data.

Recruitment of sufficiently qualified personnel toFrontex's standing corps is generally difficult and time-consuming. Differences in recruitment practices also further exacerbate capacity issues[274]. A total of 12 countries[275] recruit staff with non-law-enforcement or non-border-management backgrounds for at least one return-related role. Conversely, three countries[276] do not recruit staff from outside law enforcement or border management backgrounds for any of the listed roles.

Additional factors that limit effectiveness include language barriers, procedural incompatibilities between national systems and Frontex operations, and the need for embedded teams with interpreters and local knowledge. In some Member States, return-related tasks are outsourced to private service providers, which can reduce the added value of deploying Frontex RS or FRESO officers. There is also a shortage of trainers, particularly those qualified to teach police tactics for in-flight security.

Frontex has introduced measures, such as the commanders' training programme and a new system of ranks, to improve leadership and deployment coordination. However, these reforms have not resolved the structural shortfall, which stems from limited national resources and heavy reliance on voluntary contributions by Member States. This reliance creates instability, as national authorities can cancel or reduce deployments without warning, leaving Frontex unable to meet operational needs consistently.

**Return monitoring deficiencies**. Under the EBCG Regulation[277], '[e]very return operation organised or coordinated by Frontex shall be monitored in accordance with Article 8(6) of Directive 2008/115/EC […]'[278]. Frontex's Code of Conduct for Return Operations[279] and Management Board Decision 06/2022[280] require that any activity with fundamental rights implications must be communicated to the Fundamental Rights Office before decisions are taken. This puts a strain on the Fundamental Rights Office, which faces staff shortage[281]. Moreover, the current return monitoring system is fragmented and heavily reliant on monitors from the national systems appointed to the Forced Return Monitoring Pools. Many national oversight bodies lack sufficient staffing or funding to effectively participate, while some do not recognise Frontex's Fundamental Rights Office as their counterpart at European level. This is because this function is perceived to lack comparable independence as the Fundamental Rights Office remains part of Frontex itself. This creates gaps in coverage and inconsistencies in oversight quality and means that Frontex has access only to a limited number of resources provided by the Member States.

[274] Survey involving national authorities: BG, DE, PL, SI.
[275] Survey involving national authorities: AT, BE, CZ, DK, FI, FR, DE, LV, LT, MT, RO, SI.
[276] Survey involving national authorities: BG, IS, PL.
[277] Article 50(5) of the EBCG Regulation.
[278] Ibid.
[279] Frontex (2021), Code of Conduct for Return Operations and Return Interventions, available at: https://prd.frontex.europa.eu/document/code-of-conduct-for-return-operations-and-return-interventions-previous-version/
[280] Management Board Decision 06/2022 designating a reporting officer for the Deputy Fundamental Rights Officer's annual appraisals 2022 and 2023 (recorded in the minutes of the 88th Management Board meeting).
[281] Although the overall size of the Fundamental Rights Office's team increased significantly between 2023 and 2025 (from 10 staff in 2020 to 65 by 2025), this remains insufficient relative to Frontex's growing mandate and operational volume. In 2023, Frontex coordinated nearly 50 return operations, supporting the return of almost 40 000 individuals – a 57% increase compared with 2022 – yet the Fundamental Rights Office's capacity has not grown in line with this expansion. As a result, monitoring resources must be prioritised for high-risk operations, such as collective returns to volatile destinations, leaving many national or smaller-scale operations unmonitored. Moreover, the current EBCG Regulation only extends responsibilities connected to monitoring (amongst other things) to monitors, rather than to all staff members of the Fundamental Rights Office, which includes administrative and support staff as well, limiting the Office's flexibility beyond what the numbers alone suggest.

*c) Challenges at different stages (pre-return activities, return counselling and EU reintegration programme)*

**Pre-return activities**. Frontex strives to provide training or best-practice guidance on return case management to national authorities and contributes to identification missions. It also supports return counselling through the deployment of return specialists, although there are not enough trained staff[282]. Frontex's role in the pre-return area remains limited to case-by-case requests from Member States. Member States are required to (i) identify the third-country nationals subject to a return decision (and they often struggle to do so)[283]; (ii) assess any vulnerabilities or protection needs; (iii) provide counselling and information regarding the return process in a format and language accessible to the third-country national; and (iv) cooperate with the relevant authorities in their country of origin or potential country of return[284].

**EU reintegration programme**. Frontex plays an active role in post-return reintegration through the EU reintegration programme (EURP), previously known as the Joint Reintegration Service (JRS)[285]. While the programme expanded its geographical scope to 41 third countries, with plans for further expansion, there are still gaps in focus and coverage especially in countries that are important for returns in terms of the EU's and/or Member States' policy priorities. Other challenges concern rigidity with regard to the provision of immediate assistance upon arrival in the country of origin, which is not uniform for all types of returnees. Similarly, there is limited flexibility as regards the form of assistance (for instance, offering cash assistance in countries where arranging in-kind services is unrealistic), which continues to pose a constraint on the programme's operational effectiveness. Lastly, there are constraints in outreach to the authorities of the countries of origin covered by the programme owing to inefficient coordination and lack of long-term monitoring of the programme[286]. This highlights the need for more tailor-made and specific support. In addition, there are significant discrepancies between the sums granted by Member States to returnees. As a rough estimate, average support (converging with the figures from the EURP) is around EUR 1 000 per person for reintegration plus EUR 200 upon arrival in the case of forced return, and around EUR 2 000 plus EUR 600 in the case of voluntary return, in the latter case plus EUR 1 000 per family member. A degree of EU harmonisation of the sums granted and centralised management by Frontex would enhance the credibility and consistency of this important pillar of a humane return system.

**Return counselling**. Frontex has taken on a growing role in return counselling[287]. In the second half of 2024 alone, Frontex return specialists conducted 8 491 individual counselling sessions, resulting in 4 337 voluntary return declarations[288]. In 2024, Frontex provided training on return and reintegration

[282] Interviews with national authorities underscoring the need for adaptation to the local context, counselling tasks performed by staff and linguistic challenges.
[283] EMN (2024), Asylum and Migration Overview – Return Chapter.
[284] There are also significant differences between Member States in how they manage the pre-return phase. Some may lack sufficient capacity or infrastructure to meet best-practice standards for vulnerability checks, counselling, or cooperation with third countries. See European Court of Auditors (2021), Special Report 05/2021: Frontex's support to external border management. Available at: https://www.eca.europa.eu/en/Pages/news.aspx?nid=15349
[285] Frontex, Consolidated Annual Activity Report 2024. In 2024, the number of reintegration cases provided through the EURP doubled in comparison with 2023, totalling 9 308 cases.
[286] Member States have different reintegration models, including offering different packages such as higher amounts or only in-cash assistance. While they value the EURP, they stressed the need for better monitoring and evaluation of outcomes.
[287] Return counselling is a key step in the return process, taking place both before and after the issuance of return decisions. It involves providing migrants with clear, accurate and tailored information about their rights, obligations and available options, including voluntary return and reintegration support. Counselling sessions help individuals understand the practical and legal consequences of their choices, such as applying for asylum, remaining with no right to stay, or accepting assisted voluntary return. They also cover logistical aspects like travel arrangements, financial assistance and reintegration opportunities in the country of origin.
[288] Frontex Evaluation Report, 2024 on the results of returns implemented in the second half of 2024, p. 11.

counselling to 136 Member State staff and 50 return specialists[289].

While this demonstrates Frontex's increasing operational involvement, significant challenges remain. Counselling is highly labour-intensive, often requiring multiple individual sessions alongside group sessions, and must be adapted to local contexts, particularly in transit countries where migrants may abscond or have very limited time before moving on[290]. Language barriers between Frontex staff and national authorities, as well as the need for close coordination, further complicate delivery[291]. Moreover, Member States vary greatly in their capacity and approach.

*d) Lack of mandate for return activities from third countries,*

As migration flows increasingly involve transit countries, there is growing demand[292] for Frontex to expand its operational scope in third countries[293]. With respect to activities taking place in, or starting from, third countries, Frontex can currently only assume a limited role as Frontex's competence is legally limited to carrying out returns from the EU. Frontex does not have the mandate to support return operations departing from third countries (third-country-to-third-country), nor assist in return activities taking place in third countries, and as such cannot deploy its standing corps to third countries for operational support in the area of return[294]. Frontex is currently only mandated to provide capacity-building assistance to third countries to support their ability to receive returnees from EU Member States or general return-related capacity-building activities such as training. All of this limits the EU's ability to respond to complex transit migration patterns and to strategically leverage Frontex's operational expertise. Frontex should be able to do more in third countries, in particular to support and coordinate returns from third countries, which could include return operations from third countries. Certain third countries may be in need of assistance from Frontex to ease migration pressure on them stemming from migration towards the EU – a topic which is very relevant in the context of the 'whole-of-route approach' – and to support countries neighbouring the EU. Frontex's presence in third countries would have to be increased significantly to achieve this.

# ANNEX 7: DEVELOPMENTS SINCE THE EVALUATION OF THE EBCG REGULATION

Overall, the evaluation concluded that the EBCG Regulation is relevant to addressing the current needs and challenges at the external borders and that it provides a clear EU added value, as its objectives could not have been achieved sufficiently by Member States acting alone. While largely consistent, its effectiveness was impacted by a number of internal and external factors. Some of those stem from the Regulation itself, while others are the product of organisational, technical, logistical and implementation shortcomings, as well as rapid changes and the development of threats and challenges at the external borders, since illegal migration continues to be a major challenge and remains at the top of the EU's policy and political agenda.

The evaluation found that the operational support provided by Frontex was valued by Member States and has contributed to achieving the objectives of the EBCG. However, the absence of a clear law

[289] Frontex, Consolidated Annual Activity Report 2024.
[290] Interviews with national authorities.
[291] Ibid.
[292] Growing demand comes from some third countries and from several Member States. Frontex has been contacted by Western Balkan countries requesting that it manage returns from transit countries to countries of origin. (Frontex, Briefing Note, International cooperation and EBCG Regulation, Internal ref. STRAT/ICU/06/2025.)
[293] Interview: HOME C1 and Frontex.
[294] Status agreements between the EU and third countries are currently limited to the deployment of border management teams, in line with Article 73(3) of the EBCG Regulation. Therefore, return-related tasks are not included within the scope of status agreements and cannot be the reason for standing corps deployment.

enforcement mandate has also caused uncertainties and led to various interpretations of the exact boundaries regarding Frontex's tasks in contributing to the prevention, detection and countering of cross-border crime. This lack of clarity around Frontex' role in the fight against cross-border crime persists today (see Problem 1).

As regards returns, the evaluation acknowledged that Frontex has become an essential actor in the common EU system of returns, effectively supporting Member States through all phases of return procedures. However, several factors hindered its effectiveness in return operations and return-related activities. These included shortfalls and capacity gaps in Frontex's ability to cover deployment needs (e.g. FRESO). In addition, the evaluation noted that return authorities were not sufficiently represented on the Management Board. With the exception of the establishment of the High-Level-Round Table on Returns (a working group with no decision-making power), no major development has occurred to date on these aspects. These issues persist today and are described in the Problem definition (Problem 1 and Annex 6).

On oversight mechanisms, the evaluation highlighted the limited use of Article 112 of the EBCG Regulation (on interparliamentary cooperation). It also found that the resources of some of the oversight bodies were insufficient. As regards fundamental rights, the Serious Incident Report mechanism is not regulated in the Regulation, and several factors have an impact on its effectiveness (e.g. limited cooperation and follow-up by national authorities). The evaluation also identified problems concerning the lack of clarity of Article 111 and the implementation of Article 46. Most of these challenges persist today and are reflected in the Problem definition (Problem 1 and Problem 3).

As regards training, the evaluation found that the common training standards provided by Frontex helped to improve the training of national border guards. However, the evaluation also identified challenges affecting Frontex training. These include the fact that Frontex does not have its own training facilities, Frontex's reliance on Member States' training infrastructure and the unavailability of trainers. Moreover, factors related to EIBM, including integrated capability planning, were not fully implemented at the time of the evaluation. Hence, key aspects of EIBM could not be evaluated. Important developments since the evaluation included the adoption of the EBCG's capability roadmap, the update of the technical and operational strategy for EIBM (2023-2027), and the establishment of a methodology and procedure for establishing the national capability development plans. Despite these important milestones, the implementation of EIBM presents challenges, due to divergent operational procedures across Member States and weak alignment with EIBM standards (Problem 3). These challenges persist today and are described in the Problem definition (Problem 3).

The evaluation found that Frontex contributed to improved situational awareness at external borders through its products, including risk analysis, vulnerability assessments and situational monitoring, particularly in the framework of EUROSUR. Nevertheless, several factors impacted its ability to provide up-to-date and comprehensive situational monitoring. This stems from limitations in the EBCG Regulation related to processing of operational personal data by Frontex (including in the context of EUROSUR and for risk analysis purposes) and is partially due to certain implementation issues (including reporting by Member States in the context of EUROSUR and delays in Frontex providing risk analysis products in all four tiers of EIBM). Issues related to the implementation of EUROSUR persist today and are described in Problem 1. In addition, the enforcement of vulnerability assessments continues to undermine the evidence-based planning and alignment of resources (Problem 3).

Based on the evaluation, Frontex provides added value by offering additional human resources to Member States and third countries facing migratory challenges. However, the evaluation found that the application of the EU Staff Regulations to the Category 1 standing corps staff presents challenges. This is because the Staff Regulations were not intended to meet the needs of an operational service with executive powers, which causes inconsistencies in areas such as working conditions, selection

procedures, deployment locations, leave entitlements and disciplinary measures. Such challenges persist today and are reflected in the Problem definition (Problem 2).

The evaluation found that the lack of a clear command-and-control structure for the standing corps hampered operational effectiveness. An important development since the evaluation was the rollout of Frontex Chain of Command (FC2), which is the operational management structure used by Frontex to carry out operational activities through decentralised management of the standing corps and other relevant staff. Evidence collected as part of this study indicate that the new chain of command structure in joint operations improved operational effectiveness.

The evaluation found gaps for certain standing corps profiles (e.g. advanced-level document officers, dog handlers), and challenges related to the limited access to key databases by the standing corps. These issues persist today and are reflected in the Problem definition (Problem 2).

According to the evaluation, Frontex's cooperation with third countries was well regarded by key stakeholders. However, challenges related to the conclusions of working arrangements were identified, due to discussions tied to data protection. The evaluation also pointed out that while Frontex's cooperation with international organisations was effective, the exhaustive list of organisations that Frontex can cooperate with (as enshrined in Article 68) limits cooperation with some relevant organisations or international partners. These challenges persist today and are described in the Problem definition (Problem 1). Although the evaluation concluded that cooperation with other EU agencies (e.g. EMSA, EFCA, Europol) and bodies (EEAS as part of CSDP missions) was effective, it highlighted the importance of avoiding overlaps and better specifying the Frontex mandate when compared with agencies such as Europol. The study accompanying the impact assessment found that after the evaluation, new problems have emerged, particularly when it comes to challenges affecting cooperation between Frontex and Europol on the fight against cross-border crime.

# ANNEX 8: OVERVIEW OF POLICY OPTIONS AND MEASURES

| Policy option 0 – Baseline | Policy option 1<br>Targeted modifications to address shortcomings and gaps | Policy option 2<br>Towards a more integrated EBCG | Policy option 3<br>EBCG based on standing corps and central role of Frontex |
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| 1a. Problem Driver 1.1 – Thematic Area: Border controls | | | |
| Member States will continue retaining primary responsibility for border checks and surveillance, with Frontex operating only upon request while executive powers are exercised as a rule only in the presence of host Member States. Over time, long-term deployments, antenna offices and stronger local structures will build trust, potentially leading to broader responsibilities for Frontex.<br><br>Frontex's presence at border crossing points is expected to increase, especially for logistical support (e.g. entry-exit system) and second-line checks. However, first-line checks by Frontex officers will remain limited, and access to the border check system will vary across Member States.<br><br>The staged rollout of the seven border management and two thematic return- | **PM 1.1.1** Recognise executive powers of the standing corps (within the limits set out by the Treaties) and broaden the list of tasks of the standing corps.<br><br>**PM 1.1.2** Broaden the list of Frontex tasks to incorporate the conduct of debriefing interviews, which are a potential source of operational information and operational personal data, and return counselling interviews.<br><br>**PM 1.1.3** Mandate modifications in relevant national policies to ensure effective access of Frontex officers and assets (such as vessels) to perform frontline duties, including with the use of a national database.<br><br>**PM 1.1.4** The chain of command and contingent-based operational concept introduced by the Management | The same as Option 1 | Option 1 +<br><br>Several scenarios for division of responsibilities:<br><br>Middle scenario A, where Member States retain primary responsibility for protection of their borders, but under certain conditions and for a limited time, more responsibilities may be transferred to Frontex.<br><br>Leadership scenario B, where Frontex could be granted greater leadership and primacy in situations of serious shortcomings or critical border pressure. It would also be entrusted with reviewing and approving national |

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| profile contingents under the Frontex Chain of Command (FC2) concept will continue until the end of the 2026. The Antenna Offices will be gradually established to support the work of the new Contingents and will gradually grow in terms of the size of stationed personnel. | Board's Decision would be reflected in the EBCG Regulation to ensure more predictability. Additional powers could be delegated to Contingent Commanders/Section Leaders (issues identified in Case Study 3).<br><br>**PM 1.1.5** Ensure funding (e.g. through the BMVI) directed at increasing Member States' hosting capacity for the standing corps at border crossing points, as well as the transformation and adaptation of border crossing points to improve access by the standing corps to border control systems.<br><br>**PM 1.1.6** Modifications to EU and national policies to ensure effective access of Frontex officers and vessels so that they can perform frontline duties (e.g. facilitating the recognition of Frontex-deployed human resources and technical assets as equivalent to national authorities by port and airport operators); strengthen and encourage host Member State to authorise members of the teams to act on its behalf, when operationally justified. | | capability development plans and be granted the right to initiate deployments when national action is delayed or inadequate. Member States would be obliged to align national operational planning and resource allocation with Frontex's strategic programming, making it obligatory to provide personnel and technical assets when identified as necessary. (See also EIBM strategy and integrated planning below.)<br><br>An 'extreme' scenario C could be considered where Frontex assumes primary responsibility for the external borders of the EU. Member State assets and staff are under the command of Frontex or in joint command with Frontex. |
| 1b. Problem Driver 1.1 – Thematic Area: Cross-border crime | | | |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and** |

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| | | | **central role of Frontex** |
| Frontex's ability to meaningfully contribute to crime detection at the external borders will continue to be hindered by legal ambiguity and limited executive powers.<br><br>Cooperation with Europol will remain limited, often reactive in nature and hampered by data-sharing constraints. Frontex will be unable to provide timely or systematic intelligence to Europol on cross-border criminal activities, hampering efforts to tackle cross-border crime effectively. | **PM 1.1.7** Define and describe Frontex's cross-border crime detection tasks. These could include detection of drugs, stolen vehicles, illicit goods, illicit firearms, detection and identification of victims and perpetrators of human trafficking and migrant smuggling, and assistance to Member States in identifying cross-border criminal networks during border control activities.<br><br>**PM 1.1.8** Describe the analytical and situational awareness support functions that form part of the assistance Frontex may provide (e.g. risk analysis and monitoring of migratory flows, criminal information analysis, open-source information analysis).<br><br>**PM 1.1.9** Revise the rules for sharing operational personal data to facilitate more effective and timely transmission of operational personal data between Frontex and Europol/Eurojust while maintaining data protection safeguards, with the objective of clarifying the division of responsibilities in establishing necessity as a prerequisite for the transmission of operational personal | The same as Option 1 | The same as Option 1 |

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| | data from Frontex to Europol.<br><br>**PM 1.1.10** Complementary measures should include awareness-raising activities on data protection rules and the establishment of standard operating procedures or of an 'information governance model' between Frontex and Europol to foster the swift exchange of data on the basis of specific and targeted requests, thus reducing the administrative burden and speeding up responses. | | |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |
| 1c. Problem Driver 1.1 – Thematic Area: Emergencies and hybrid threats | | | |
| Frontex's mandate does not explicitly cover support to Member States' authorities in exceptional situations beyond the traditional scope of border management. This limitation restricts Frontex's ability to provide operational assistance during crises, including natural disasters or hybrid threats, where its resources could offer added value.<br><br>Under Regulation (EU) 2024/1359 addressing crisis situations and cases | No measure | **PM 1.1.11** Obligation to include cooperation mechanisms in OPLANs between national civil protection authorities and national border management authorities, as well as SOPs on how the standing corps could assist national authorities when addressing the consequences of natural disasters and hybrid threats.<br><br>**PM 1.1.12** Obligation for | No measure |

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| of force majeure in the field of migration and asylum, a Member State facing a situation of crisis or force majeure may request support from Frontex. | | Frontex to conclude a memorandum of understanding with DG ECHO/the ERCC, with a view to facilitating the exchange of information and enhancing situational awareness. The standing corps could participate in the UCPM training and exercises in order to better understand coordination mechanisms and emergency response operations. | |
| **Policy option 0 – Baseline** | **Policy option 1**<br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br>**Towards a more integrated EBCG** | **Policy option 3**<br>**EBCG based on standing corps and central role of Frontex** |
| 1d. Problem Driver 1.1 – Thematic Area: Visa policy | | | |
| Frontex's implementation of the four-tier access control model will continue to be fragmented, given the fact that Frontex is not responsible for supporting the EU's visa policy.<br>The increased use of false documents and identity fraud by travellers attempting to circumvent visa or travel authorisation requirements will pose growing challenges for consular staff, who may not always be fully equipped to detect and respond to such scenarios. | No measure | **PM 1.1.13** Explicit responsibility for Frontex to provide regular training sessions on detecting fraudulent documents and identifying visa fraud cases.<br>**PM 1.1.14** Obligation on the part of Frontex's Analysis Unit to develop dedicated risk analysis products focused on specific third countries, identifying evolving trends in document fraud, visa abuse and visa shopping. | Option 2 +<br>**PM 1.1.16** Possibility of temporary deployment of standing corps officers to help Member States' consular delegations process visa applications during peak periods. (This measure would mean that the legal basis of the EBCG Regulation would need to be supplemented.) |

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| | | **PM 1.1.15** Expand the training currently offered by Frontex for the consular staff of EU Member States by providing regular training sessions, e.g. on detecting fraudulent documents and identifying cases of visa fraud. | |
| **Policy option 0 – Baseline** | **Policy option 1**<br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br>**Towards a more integrated EBCG** | **Policy option 3**<br>**EBCG based on standing corps and central role of Frontex** |
| 2. Problem Driver 1.2 – Thematic Area: EUROSUR | | | |
| EUROSUR will continue to develop and to serve as the main platform to support situational awareness. Although EUROSUR 2.0 is expected to improve the delivery of near real-time situational awareness on migration flows, issues related to data quality and data quantity, delays in incorporating national data into EUROSUR and overclassification of information will remain.<br><br>The restricted scope of personal data outlined in Article 89(2) will continue to negatively impact situational awareness. | **PM 1.2.1** Broaden EUROSUR's objective to include identification of potential strategic and operational risk in order to provide a forward-looking situational picture.<br><br>**PM 1.2.2** Clearly outline and distinguish the roles of the NCCs and National Frontex Points, including 24/7 duties.<br><br>**PM 1.2.3** Clarify the scope of air border surveillance and establish the obligation of civil-military information exchange linked to EUROSUR. | Option 1 +<br><br>**PM 1.2.9** Revise the EBCG Regulation to add new categories of data that can be processed to enrich the data for the purpose of situational awareness.<br><br>**PM 1.2.10** Allow EUROSUR to include statistical or aggregated and anonymised data derived from social media monitoring activities outside of EUROSUR.<br><br>**PM 1.2. 11** Integrate EUROSUR data quality aspects into the Vulnerability Assessment by | + Option 2 (including O1)<br><br>**PM 1.2.12** Enable broader processing of personal data by removing ship and aircraft identification numbers as the sole personal data to be processed in EUROSUR and by adding new categories of personal data. These modifications would eventually lead to redefinition of the purpose of EUROSUR.<br><br>**PM 1.2.13** Broaden the |

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| Without robust quality enforcement mechanisms, quality shortcomings and incompleteness will persist.<br><br>In the absence of improved access to key information/data on all types of threats, Frontex will continue to operate with fragmented situational awareness. | **PM 1.2.4** Differentiate data-sharing rules with third countries vs EU partners to allow flexible cooperation.<br><br>**PM 1.2.5** Reduce overclassification and enable mixed classified (limited/confidential) communication networks.<br><br>**PM 1.2.6** Broaden the scope of the situational pictures to include internal security events or incidents of a hybrid nature.<br><br>**PM 1.2.7** Remove integrated planning as a EUROSUR component but use EUROSUR as a source for integrated planning.<br><br>**PM 1.2.8** Incentivise Member States to ensure appropriate quality data in EUROSUR via the dedicated EU funds (e.g. BMVI). | expanding the assessment to cover the full set of responsibilities and capabilities for collecting, validating and sharing surveillance information. Rather than duplicating the existing EUROSUR data quality report, the Vulnerability Assessment would use it as a diagnostic tool and as a baseline for evaluating whether recommendations issued to Member States lead to tangible improvements. This would eventually serve as an enforcement mechanism for the provision of data quality in EUROSUR by Member States. | scope of personal data that could be processed in the context of social media monitoring, which would become part of EUROSUR.<br><br>**PM 1.2.14** Broaden the scope of EUROSUR to cover the entire EIBM, including return (through the establishment of a separate return layer in the situational picture) [to be decided following the proposal on the digitalisation of returns].<br><br>**PM 1.2.15** Enhance Frontex's direct access to outputs from national surveillance assets (e.g. direct access to national integrated surveillance system equivalent to the access that local/regional/national coordination centres have – including fixed and mobile systems, geo-location of patrols and assets, or, in a broader sense, the 'surveillance infrastructure at the Member State level').<br><br>**PM 1.2.16** Add to EUROSUR a new indicator |

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| | | | for migratory pressure for the 'prevented entries' at external borders outside border crossing points.<br><br>**PM 1.2.17** Develop Frontex's in-house AI tools to analyse data from multiple sources.<br><br>**PM 1.2. 18** Give Member States financial support to link their systems together. |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |
| 3a. Problem Driver 1.3 – Thematic Area: Cooperation with third countries and CSDP missions | | | |
| The operational limitations of existing status agreements are likely to persist and even intensify. The key enablers, such as equipment registration, staff legal status and Frontex's recognition as a legal entity, will remain unaddressed. This will limit the capacities of Frontex to autonomously deploy personnel, move and operate equipment, and engage effectively with local authorities.<br><br>Frontex's cooperation with third | **PM 1.3.1** Align the procedure for signing working arrangements with the approach applied to other EU agencies (e.g. EUAA).<br><br>**PM 1.3.2** Encourage Frontex to review the need to update existing working arrangements, such as between Frontex and the EEAS but also with international organisations or third countries, to align them with Frontex's new mandate and enable, for example, access to EUROSUR. | Option 1 +<br><br>**PM 1.3.7** Explicitly recognise Frontex, in the EBCG Regulation, as the main partner for border management components of projects implemented in third countries. This may require corresponding adjustments to be made to funding regulations. | Options 1 + 2 +<br><br>**PM 1.3.8** Enable Frontex to support/join existing bilateral arrangements between Member States and third countries, following the Management Board's approval. |

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| countries will remain constrained, with slow progress on concluding working arrangements and status agreements.<br><br>However, the adoption of a new model working arrangement with a data protection annex for third countries, on which the EDPS has given a positive opinion, is expected to alleviate this situation to a certain extent. The same applies to the newly published EDPS model administrative arrangement for transfers of personal data from EU institutions to public authorities in third countries and the EDPS model administrative arrangement for transfers of personal data from EU institutions to international organisations.<br><br>Administrative burden will remain due to the requirement for the Management Board to adopt a list of priorities on the deployment of liaison officers in third countries on a yearly basis, although no changes are required from one year to the next. | **PM 1.3.3** Remove the requirement for the Management Board to adopt an annual list of priorities on the FLOs in third countries.<br><br>**PM 1.3.4** Establish a Commission-led regular dialogue between the EEAS and Frontex to foster closer cooperation and a greater understanding of the complementary mandates of Frontex and the CSDP missions and to leverage Frontex's EIBM expertise in CSDP missions that have a border management component.<br><br>**PM 1.3.5** Encourage dialogue with third countries in which status agreements are in place to make it possible to prepare updated operational plans to facilitate pre-arrival checks at airports as part of third countries activities, including the development of standard operating procedures and task division. | | |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |

| 3b. Problem Driver 1.3 – Thematic Area: Cooperation with international organisations | | | |
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| The closed list of international organisations in Article 68 will continue to limit Frontex's ability to establish structured cooperation with key partners beyond those explicitly named.<br><br>Progress on updating or concluding working arrangements with international organisations and EU agencies will remain slow. | **PM 1.3.6A** The amended list of international organisations would include additional international organisations (e.g. NATO) with whom Frontex could cooperate.<br><br>**[same as PM 1.3.1]** Revise the procedure for concluding working arrangements with other international organisations in order to align it with the procedure used by other EU agencies with the approach adopted for other EU agencies. | Same as Option 1 on procedure for concluding working arrangements with international organisations.<br><br>**PM 1.3.6B** The list of international organisations would include a more flexible/open narrative, allowing Frontex to cooperate with international organisations relevant to its mandate, removing the 'closed' list, but requiring prior authorisation of the Management Board to ensure relevance for the mandate. | Same as Option 2 |
| Policy option 0 – Baseline | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |
| 4a. Problem Driver 1.4 – Thematic Area: Returns | | | |
| Without EU-level action, fragmented national return systems, operational inefficiencies and growing pressures on Member States would persist or worsen, leading to rising backlogs, higher absconding rates and difficulties upholding fundamental rights. The lack of reform could also | **PM 1.4.1A** Introduce the obligation to adopt EU-level guidance documents and **establish structured and binding coordination mechanisms** between annual planning cycles and other EU and national planning.<br><br>**PM 1.4.2A** Mandatory regular information sharing by Member States | Option 1 +<br><br>**PM 1.4.14B** Frontex would become a default operational **actor** in all EU-coordinated and/or EU-funded return operations (both voluntary and forced). Member States could continue organising their own | Options 1 + 2 +<br><br>**PM 1.4.14C** Frontex would assume a central role in coordinating all EU return operations (based on return decisions issued by the Member States), and in principle without the |

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| prevent Frontex from fulfilling ambitions of swifter returns under the Pact on Migration and Asylum and the proposed Return Regulation.<br><br>As the border procedure, a key pillar of the EU's reformed migration management, came into force in June 2026, pressure will significantly increase, particularly on frontline Member States, to swiftly return individuals by utilising this procedure.<br><br>The proposal for a Return Regulation aims to significantly improve the efficiency of the return process in Member States. This increase in Member States' capacities to return will require Frontex to play a greater and central role in coordinating, supporting and operationalising returns. An expansion of Frontex's operational responsibilities in areas such as organising joint return operations, providing operational support to return operations beyond EU territory, and providing interoperable digital tools to harmonise procedures EU-wide will also be required. All these new aspects would require the EBCG Regulation to be amended. | with Frontex on forced and voluntary returns.<br><br>**PM 1.4.3** Adjust the EU's return monitoring system by increasing resources, enlarging the Forced Return Monitoring Pool.<br><br>**PM 1.4.4** Expand the vulnerability assessment of the EU's external borders on return to better integrate it into EIBM risk analysis, EU standards and training for monitors.<br><br>**PM 1.4.5A** Create a legal basis for reintegration to increase accountability and streamline Frontex's related activity.<br><br>**PM 1.4.6** Further clarify in the legal text the existing preconditions for Frontex to assist Member States with return operations or reintegration support.<br><br>**PM 1.4.7** Refocus and strengthen the EU reintegration programme (EURP) and broaden the EURP's scope to include pre-return counselling and assistance for migrants considering voluntary return.<br><br>**PM 1.4.8** Create a shared EU platform for identification data and strengthen Frontex's role in organising and facilitating joint identification missions with third countries. | returns, with national funds.<br><br>**PM 1.4.1B** Frontex would be mandated to proactively plan, match and pool resources for return flights and shared escort needs. Frontex would establish a 24/7 Return Support Desk providing real-time operational assistance.<br><br>**PM 1.4.2B** Frontex would collect system-relevant statistical data on all planned, ongoing and terminated return operations and share it in a secure manner with all Member States and the Commission.<br><br>**PM 1.4.15** Frontex to develop uniform standards to be applied by both Frontex and EU Member States on return monitoring, in line with the Return Regulation to promote consistent practices across all EU-supported return operations. Frontex would continue to provide logistical and technical support for deploying monitors.<br><br>**PM 1.4.16B** Frontex would support and coordinate returns from third countries, where clear conditions and legal safeguards are in place, to address immunities and privileges of | possibility of Member States opting out of performing national return operations. Frontex would absorb many operational return functions currently managed by Member States or external partners like the IOM, subject to the introduction of appropriate oversight and quality-control mechanisms.<br><br>**PM 1.4.16C** Frontex's mandate would be expanded to lead return operations from one third country to another third country under new return status agreements, allowing the deployment of Frontex return teams on the territory of a third country, where clear conditions and legal safeguards are in place.<br><br>**PM 1.4.17C** Frontex would be able to enter and update information in SIS; a SIRENE office would then be created at Frontex, similar to Europol.<br><br>**PM 1.4.5C** The Frontex EU reintegration programme would be |

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| | **PM 1.4.9** Consolidation and enhanced interoperability of several digital tools managing return, readmission and reintegration cases.<br><br>**PM 1.4.10** Adjust Frontex's Return Operational Plans' sequencing and introduction of shared platforms to exchange information on return schedules, charter capacity and escort needs.<br><br>**PM 1.4.11** Leverage existing provisions in the EBCG Regulation to facilitate the provision of training and capacity-building on return processes to partner third countries, particularly in transit regions.<br><br>**PM 1.4.12** Enhance the number and profiles of specialised Frontex return staff.<br><br>**PM 1.4.13A** Revamp the deployment of EU return liaison officers (EURLOs). | deployed staff as well as guarantee overall compliance with EU law.<br><br>**PM 1.4.17B** To be able to perform its strengthened return responsibilities, Frontex would receive general read access to the Schengen Information System (SIS), beyond the current limited access by the standing corps via a Member State during a specific return operation. A SIRENE office would be created in Frontex, similar to Europol.<br><br>**PM 1.4.5B** Create a legal basis for Frontex's broad responsibility for reintegration efforts on the part of the EU, and a legal basis for Frontex assuming a role in the digitalisation of return, readmission and reintegration efforts.<br><br>**PM 1.4.13B** Introduce Frontex return liaison officers in third countries.<br><br>**PM 1.4.18** Frontex to provide structural support in developing standardised return counselling and reintegration counselling across the EU, aimed at promoting voluntary returns. | turned into a fully-fledged EU Reintegration Service. Moreover, instead of Frontex contracting service providers in third countries, Frontex would establish offices with their own reintegration case workers in third countries. Steps would also be taken to create a legal basis for Frontex assuming a role in the digitalisation of return, readmission and reintegration. |

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| | | Frontex return specialists would become a shared resource. | |
| 4b. Problem Driver 1.4 – Thematic area organisational governance with respect to returns | | | |
| The governance of the EBCG will remain narrowly focused on Frontex, rather than encompassing the full EBCG.<br><br>The Management Board will continue to act in a reactive manner, also due to the large number of issues brought to its attention and requiring a decision from it, with limited proactive, strategic leadership needed to steer the development of the entire EBCG.<br><br>The lack of decision-making power (or integration of return authorities in Frontex's governance) on the part of the HLRTR and limited meaningful engagement with the MB will continue, preventing the EBCG from ensuring strategic alignment or decision-making on return activities. | No measures | **PM 1.4.19B** Explicitly recognise the role of working groups in the legal text, and strengthen coordination between preparatory working groups, such as the high-level round table on returns, and the Management Board.<br><br>**PM 1.4.20** Introduce internal rules (e.g. through a MB Decision) to strengthen coordination between Frontex working groups (particularly the HLRTR for strategic steering and the EIBM WG to ensure quality assurance on the return framework) and the MB.<br><br>**PM 1.4.21** A dedicated working group on returns would address technical, operational and implementation issues and report to the Management Board, to ensure operational focus. | Option 2 +<br><br>**PM 1.4.19C** Revise the rules of the Management Board to include a dedicated system of governance for returns, strengthening the role of return authorities in Frontex's governance structure. |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |

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| 5a. Problem Driver 2.1 – Thematic Area: Standing corps architecture (recruitment, retention and size) | | | |
| Frontex's recruitment strategy will remain targeted at reaching 10 000 officers by 2027, i.e. 3 000 Category 1 officers, 1 500 Category 2 officers and 5 500 Category 3 officers.<br><br>Recruitment will become replacement-driven, with approximately 200 new Category 1 hires per year. This will be intensified once the first cohorts of Category 1 officers reach the end of their 5+5 year contracts, if not renewed for an indefinite duration.<br><br>The 4% limit on operational support and monitoring staff will continue to significantly constrain Frontex's effectiveness and efficiency across different logistical, technical and operational activities.<br><br>The standing corps will continue to not be geared to cater to the increased need for specific profiles for return specialists. The standing corps is currently geared to officers with a law enforcement background. However, many of the specialist profiles required to better support return, such as return counselling, cultural mediation and medical and vulnerability support, would not require a law enforcement | **PM 2.1.1A** Increase standing corps Categories 1, 2 and 3 from 10 000 officers to 30 000 to boost Frontex's capacity to support Member States and anticipate the increased demand for support in view of the implementation of the Pact.<br><br>**PM 2.1.2** Amendments to the EBCG Regulation to raise the ceiling of 4% of the total permanent deployment component of the SC and a provision enabling the MB to establish the scope of the operational support function based on an annual capability needs assessment.<br><br>**PM 2.1.3** The concept of 'deployment' would be included in the EBCG Regulation to reflect the deployment and rotation system.<br><br>**PM 2.1.4** Article 61 and its implementing acts would be revised to align the conditionality for payment for Category 2 with the actual secondment of officers (rather than the increase in national staffing) and introduce harmonised templates and clearer timelines for data submission and verification.<br><br>**PM 2.1.5** Creation of a Deployment | Option 1 + the following modifications as regards standing corps<br><br>**PM 2.1.1B** Category 5 within the standing corps is conceived as a capability-harmonisation reserve, designed to promote the consistent application of EU standards across the operational domains of EIBM, including returns. Category 5 officers would be staff from Member State national authorities who complete a comprehensive Frontex training curriculum aligned with the EBCG Training Strategy to overcome the challenges related to competing by Frontex and Member States for the same professionals. This would serve as a 'top-up' to national training systems, rather than replacing them.<br><br>Officers selected by Member States to be part of Category 5 would be identified based on a capability needs assessment process, to be carried out jointly by Frontex and Member States.<br><br>Category 5 would be available | Options 1 and 2 + (except solution for the overall size of the standing corps, which should be replaced by the following):<br><br>**PM 2.1.1C** A substantial expansion of the standing corps to 30 000 by 2041, aligned with a wider mandate covering returns, visa support, crime detection and technical equipment.<br><br>Gradual growth of Category 1 (at least 5 000 by 2041) combined with the introduction of Category 5 as described in Option 2 (18 000 by 2041) [numbers TBD], embedding the reserve force available for exceptional circumstances into the expansion while keeping Member States' contributions fixed.<br><br>Standing corps size: factors concerning its growth:<br>- **Returns**: Capability to lead and carry out operations, resulting in |

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| background or training.<br><br>Burdensome administrative requirements linked to eligibility conditions stemming from Article 61 will continue to pose barriers to secondments rather than facilitating them. | Handbook to provide a common framework for deployment procedures and establish an early warning mechanism for Member States to flag anticipated shortfalls in Category 2 and 3 contributions.<br><br>*[numbering continues for another thematic area, as this concerns the entire problem driver]* | for deployment in exceptional cases. Deployment would be capability-driven, with Frontex selecting the teams or units best suited to the specific operational scenario, rather than mobilising the entire pool or having it as a permanently deployed component.<br><br>The rollout of Category 5 would be progressive. The reserve is expected to start in 2030 and reach 20 000 by 2041.<br><br>**PM 2.1.9** The Deployment Handbook proposed under Option 1 would be made binding through a Management Board decision as an enforceable framework applicable to all those involved in standing corps deployments.<br><br>**PM 2.1.10** The introduction of Category 5 would require an expansion of the **financial support system** under Article 61, as adjusted under **PM 2.1.4**. An alternative measure could envisage covering this financial support under the border management and visa funding instrument in the new Multiannual Financial Framework, creating a | increased demand for return counsellors, escorts, coordinators and monitors (increasing across the Options).<br>- **Cross-border crime**: Expanded detection and prevention functions at borders increasing demand for investigative, analysis, and surveillance profiles (constant across the Options).<br>- **Strategic and operational planning**: Stronger EU-level planning capacity and pooling to ensure consistent capability development and surge planning (increasing across the Options).<br>- **Training and qualification system**: An expanded instructor base and training offer to deliver and absorb the expanded responsibilities (increasing across the Options).<br>- **Visa policy**: More structured operational support to consular services. |

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| | | simplified, performance-based compensation system.<br><br>**PM 2.1.11** An oversight and enforcement mechanism is added to the Regulation to ensure reliable contributions from Member States for Categories 2 and 3. Persistent non-compliance would be escalated to the MB. | |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |
| 5b. Problem Driver 2.1 – Thematic Area: Employment conditions | | | |
| Starting in 2030, the first cohort of Category 1 standing corps officers will reach the end of their 10-year contracts. This will mark the beginning of a predictable and recurring cycle of contract expirations, with subsequent cohorts exiting the service each year based on their year of entry. Without a mechanism for contract renewal or transition to indefinite contracts, Frontex will face a sharp increase in annual attrition among Category 1 staff, potentially losing hundreds of trained officers per year. | Include targeted changes to the employment and working conditions of the standing corps operational staff.<br><br>**PM 2.1.6** Determine that passing the training is mandatory for continuing employment with Frontex.<br><br>**PM 2.1.7** Adjust work patterns (shift work, stand-by duty) to operational reality and provide a compensation scheme for particularly difficult or risky working conditions/nature of work.<br><br>**PM 2.1.8** Amend the current | Option 1 +<br><br>**PM 2.1.12** Develop a system making it possible to take into account the outcome of compulsory training (e.g. a contract system could be developed which would be aligned with Frontex's training system and cater for long-term career prospects; one-year contracts would be offered at a lower entry grade for officers having to undertake mandatory training; transfer into a higher | Same as Option 2 |

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| Frontex will therefore need to intensify recruitment efforts significantly. This includes scaling up selection, onboarding and especially training capacity, which is currently capped at around 1 000 officers per year.<br><br>The need to replace large portions of the operational workforce on a rolling basis will place significant strain on HR, logistics and budget planning of Frontex.<br><br>The limitations deriving from the application of certain provisions of the EU Staff Regulations/CEOS and its implementing rules to Category 1 operational staff will continue to hamper its effectiveness. These include the degree to which Frontex Category 1 staff can integrate into operational arrangements in joint operations due to work-time patterns, the mission system applicable to standing corps deployments, the mismatch between probation and training duration and long-term staff retention. | provision on the place of employment in the EBCG Regulation to allow, as a general rule, the place of deployment to become the place of employment.<br><br>Develop implementing measures to facilitate recruitment and promotions (e.g. reclassify staff based on criteria relating to operational merit). | grade would only apply to officers successfully passing the training).<br><br>**PM 2.1.13** Some implementing measures could be envisaged to facilitate the use of indefinite contracts (e.g. making continued service conditional upon periodic physical and psychological fitness assessments, allowing officers to transition into non-operational leadership or functions). | |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |

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| 6. Problem Driver 2.2 – Thematic Area: Technical equipment and IT systems | | | |
| The development of capabilities within the EBCG will continue to follow the strategic direction set out in the 2024 edition of the Frontex capability roadmap.<br><br>Frontex will maintain its current approach to equipment acquisition, leasing and joint management within existing budgetary limits. Although the capability roadmap is expected to progress, the full implementation of the multiannual acquisition strategy remains uncertain due to financial constraints.<br><br>The technical equipment pool (TEP) is likely to remain at current levels. There are no clear indications in the EU or national budgets to suggest a significant expansion. Consequently, shortages of critical equipment are expected to persist, particularly during the summer months when operational demand peaks. | IT systems:<br><br>**PM 2.2.1** Clear references to the activities and tasks linked to the management, operation, and coordination mechanisms of ETIAS and FADO would be added to the EBCG Regulation. | Same as Option 1 for IT systems.<br><br>**PM 2.2.2** Frontex capacities would be reinforced to act as a central purchasing coordinator for some categories of equipment, using the possibility of joint procurement.<br><br>**PM 2.2.3** A central logistics unit within Frontex would be established to coordinate deployment, maintenance and servicing of owned equipment across borders. This would include a fleet management system for patrol cars.<br><br>**PM 2.2.4** Participation in Coordinated Maritime Presence (CMP) operations would be strengthened, enabling EU-level coordination of national assets without Frontex ownership.<br><br>**PM 2.2.5** The technical equipment pool (TEP) would be expanded to better cover priority operational needs, including enhanced maritime and aerial surveillance capabilities and advanced processing/analytical | IT systems:<br><br>Same as Option 1<br><br>Technical equipment options for FX:<br><br>Scenario 1 – Limited increase: In the near term, Frontex expands only modestly, extending current leased air-surveillance arrangements and potentially adding a small category of seaborne assets, such as coastal patrol boats. Land-border equipment would grow only in line with staffing.<br><br>Scenario 2 – Medium ambition: Most assets remain leased, but Frontex acquires or charters a small core fleet of unmanned aerial vehicles or mid-range patrol vessels for deployment in priority areas, feeding data directly into EUROSUR. Sensor, communication and interoperability upgrades |

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| | | tools; acquisition and maintenance of very large assets would remain outside the scope of Frontex.<br><br>**PM 2.2.6** An enforcement mechanism will be developed for cases of persistent non-compliance of Member States/SAC with their commitments to the TEP. This would be paired with measures to ensure compliance with the TEP commitments via the new BMV funds as one of the indicators.<br><br>**PM 2.2.7** EU-wide recognition mechanisms in areas such as firearm permits and vehicle roadworthiness tests will be gradually introduced. | accompany this, while leasing of manned aircraft and chartering of coastal patrol vessels/offshore patrol vessels continues.<br><br>Scenario 3 – Long-term high ambition: Frontex gradually builds a fully owned maritime and aerial surveillance fleet comparable to those of Member States. The first decade focuses on procurement, staffing/operating crew and developing needed capabilities and the supporting logistics and bases, consistent with Case Study 2 and Frontex's long-term surveillance plans. Until full capabilities are developed, leasing of equipment continues.<br><br>**PM 2.2.8** Frontex's coordination and logistics capacities will need to adapt to ensure adequate support for deploying and managing large aerial and maritime equipment.<br><br>**PM2.2.9** A joint operational framework will be |

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| | | | developed to support the deployment of maritime assets.<br><br>**PM 2.2.10** For harmonisation and interoperability, same as Option 2, with the addition of the establishment of a multilateral agreement for mutual recognition, coordinated by the EASA and the EMSA, to facilitate cross-border deployment of Frontex-operated vessels and aircraft.<br><br>**PM 2.2.11** A European mission flag or pennant will be adopted.<br><br>**PM 2.2.12** Joint procurement and co-financing: Same as Option 2, but Frontex will also explore the possibility of co-ownership and chartering for large maritime assets. |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |

| 7. Problem Driver 3.1 – Training architecture | | | |
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| Without stronger EU-level mechanisms to enforce and align training standards, deeper harmonisation across the EBCG will remain limited.<br><br>The Common Core Curriculum (CCC) will continue to face fragmented implementation due to its non-binding nature, with national differences in training duration and structure sustaining disparities in preparedness.<br><br>The CCC's limited alignment with long-term capability planning and the absence of a dedicated return-related curriculum weaken its strategic relevance and consistency across deployments.<br><br>The recently launched three-tier EBCG Academy concept is expected to reach full operational maturity by 2027.<br><br>Although the establishment of the EBCG Academy Training Centre is a positive step that will enhance sustainability and efficiency of training delivery, capacity and staffing challenges are expected. Ensuring training quality across the three-tier model will be equally critical.<br><br>The ongoing formal accreditation of | **PM 3.1.1** Frontex would strengthen enforceability of the Common Core Curriculum for border and coastguard basic training in the EU and the CCC for border and coastguard mid-level management training in the EU (CCC-ML) by transforming the CCC interoperability assessment programme (CCC-IAP) into a compliance and follow-up mechanism, requiring Member States to submit formal responses and improvement plans, with systematic monitoring and reporting.<br><br>**PM 3.1.2** Frontex would expand the trainer pool by introducing a standing corps trainer profile, supported by targeted recruitment, certification, and training-of-trainers, while incentivising Member States to second national trainers through quota credits and enhanced benefits.<br><br>**PM 3.1.3** Frontex would introduce voluntary joint training exercises in key operational areas, supported by a clear legal basis, to strengthen interoperability, common standards and preparedness, with scenario-based delivery under certified trainers. Where appropriate, joint exercises could be open to candidate countries. | Option 1 +<br><br>**PM 3.1.11** A structured leadership training pathway for mid- and senior-level staff (Categories 1-3 and 5) would be developed to strengthen interoperability in command and coordination skills and ensure interoperable operational planning.<br><br>**PM 3.1.12** Introduce a dedicated EU top-up training pathway for Category 5. The training would be funded by Frontex. It would not replace national systems but would provide a harmonised entry point, ensuring comparability of competences across the EU. Successful completion of the programme would serve as the prerequisite for registration as Category 5 officers.<br><br>The general programme would combine theoretical modules on EU law, mandatory and recurrent training on fundamental rights, and EIBM principles with practical, scenario-based exercises simulating complex operational contexts. | Option 1 + structured leadership training pathway under Option 2 + a dedicated EU top-up training for Category 5 + (in case of expanding category 1)<br><br>**PM 3.1.15** Scale up the training of Category 1 to meet expanded standing corps needs with the operational training programme restructured in two stages: an initial period at the EBCG Academy Training Centre, followed by a field-training phase delivered at contingents or antenna offices.<br><br>The EBCG Academy would need to be upgraded to Division level, with more permanent staff to coordinate course design, scheduling, quality assurance, and certification. Trainer availability would be expanded by introducing a dedicated Category 1 trainer sub-profile, supplemented by national experts. |

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| the EBCG Academy as a recognised training provider, once completed, would ensure that Frontex-issued certificates – particularly in specialised areas such as document expertise or return operations – can be recognised by Member States and universities alike. However, without additional measures, the recognition of Frontex training in national systems will remain uneven and largely symbolic. | **PM 3.1.4** Frontex would deliver mandatory common pre-deployment training for Categories 2 and 3.<br><br>**PM 3.1.5** Frontex would consolidate and stabilise entry-level/core standing corps training in a dedicated EBCG Academy Training Centre to reduce reliance on ad hoc hosting by Member States.<br><br>**PM 3.1.6** Frontex would incentivise schemes at individual and Member State level to expand the trainer pool (career-linked recognition).<br><br>**PM 3.1.7.** Reinforce return component in training. Frontex would accelerate the development of a dedicated Common Core Curriculum for return functions through a task force, clear workplan, and engagement of Member State experts and EU bodies.<br><br>**PM 3.1.8** Expand the existing specialised training modules to ensure sufficient training opportunities and address capability shortages (e.g. document check, dog handlers).<br><br>**PM 3.1.9** Frontex would develop a structured approach to ensure recognition and transferability of its accredited training by encouraging mutual recognition with national academies. | Different delivery approaches could be pursued alone or in combination: centralised training in Warsaw, mobile training teams deployed to national sites, or through accredited national training institutions. The latter option would require a legislative amendment to empower Frontex to act as a self-accrediting body, responsible for accrediting, overseeing and quality-assuring national programmes.<br><br>**PM 3.1.13** Increase and expand the internal capacity (of the EBCG Academy) with additional permanent staff to handle the increased training needs.<br><br>**PM 3.2.14** Further expand the pool of trainers, including Member State trainers (national experts). | Centralised expansion would focus on the newly established training facility, capable of hosting a large share of OTP cohorts. This would be complemented by a further expansion of partnership agreements with national academies for specialised training.<br><br>The Learning Management System (LMS) would be expanded to deliver preparatory and refresher modules online. |

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| | **PM 3.1.10** Strengthen assessment, certification and role-matching of officers to specialist roles to ensure that adequately trained and experienced officers are deployed for key specialist roles. | | |
| **Policy option 0 – Baseline** | **Policy option 1**<br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br>**Towards a more integrated EBCG** | **Policy option 3**<br>**EBCG based on standing corps and central role of Frontex** |
| 8. Problem Driver 3.2 – Thematic Area: Strategic and integrated EIBM planning | | | |
| While national authorities remain formally obliged to prepare EIBM strategies, these inputs are uneven in quality, delayed in delivery and weakly aligned with EU-level priorities.<br><br>Without a mandatory reporting or enforcement mechanism, Frontex will continue to have only partial visibility of how strategies are implemented and little leverage to correct gaps or inconsistencies.<br><br>Frontex's ability to consolidate national inputs into a coherent technical and operational strategy will remain limited. | (non-legislative measures only)<br><br>**PM 3.2.1** Introduction of a biennial peer review mechanism to allow Member States to engage in mutual learning and exchange good practices, paired with the possibility for the most advanced candidate countries to participate as observers in this peer-review process.<br><br>**PM 3.2.2** Frontex would develop a reporting template for national IBM strategies to use when submitting biennial implementation updates on their national IBM strategies. This template could also be shared with candidate countries, which, as part of their accession negotiations, are | **PM 3.2.9** The EBCG Regulation would oblige the Management Board to adopt a formal multiannual EIBM planning calendar setting common timelines across key planning products, such as national strategies for EIBM, NCDP, the capability roadmap, strategic risk analysis and vulnerability assessment.<br><br>**PM3.2.10** The EBCG Regulation would oblige the Member States to comply with the updated NCDP methodology including a mandatory guidance annex and | **PM 3.2.17** Member States would be legally required to adopt or update their national EIBM strategy aligned with the multiannual EIBM strategy within six months of each new cycle and transmit them to both Frontex and the European Commission. Member States would also be required to submit triennial or earlier updates in the event of significant operational or institutional changes. |

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| | required to align their IBM strategies with EIBM standards.<br><br>**PM 3.2.3** Frontex would establish a fixed multiannual planning calendar aligned with the EBCG cycle in order to ensure synchronisation of planning cycles for national strategies, national capability development plans (NCDPs), the standing corps programming, the TO EIBM Strategy and vulnerability assessments. Frontex would coordinate this process through structured guidance and annual planning workshops, ensuring that submissions are timely and consistent. This would improve consistency and create a more systematic link between strategy, capability development and operational deployment.<br><br>As regards integrated planning, the proposed measures would include the following:<br><br>**PM 3.2.4** Frontex would promote better use by the Member States of the standardised methodology and template adopted by the Frontex Management Board (Decision 28/2024) for the NCDPs and ensuring that Frontex regularly updates the template.<br><br>**PM3.2.5** Frontex would enhance its guidance and technical support to Member States to ensure that all | scenario-based planning elements, plus standardised contingency planning templates for the parts of the national contingency plans that require Frontex support. They would also be obliged to provide regular updates of planning inputs and submit them in a timely manner, ensuring that they are of a high quality.<br><br>**PM 3.2.11** The Management Board would adopt a formal EIBM planning calendar and update the Decision 28/2024 on the NCDP methodology with a mandatory guidance annex and more stringent requirements for scenario-based planning. Frontex would support implementation through an annual strategic outlook.<br><br>**PM 3.2.12** Frontex would issue an annual plan and propose a limited set of planning KPIs (e.g. timeliness/completeness of submissions, capability readiness indicators) to support comparability and follow-up. It would also standardise contingency planning templates.<br><br>*[numbering continues for* | **PM 3.2.18** With regard to integrated planning, Member States would be obliged to update their NCDPs at least every three years or whenever a material operational or institutional change occurs and transmit them within one month of adoption.<br><br>**PM 3.2.19** Amendment of the rules applicable to joint procurements making it obligatory for Frontex to invite Member States to participate in follow-up measures, including joint procurement or coordinated investments where synergies or capability gaps are identified through the planning process.<br><br>**PM 3.2.20** Elevate the planning brief from an analytical support tool to a core component of a Management-Board-supervised capability cycle by obliging the Management Board to formally approve the Capability Roadmap each |

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| | NCDPs are forward-looking and adaptable to crisis situations. To that end, they would need to embed scenario-based capability planning as provided for in the methodology (i.e. be based on risk analysis and vulnerability assessments).<br><br>**PM 3.2.6** Frontex would embed a stronger forward-looking function in the EIBM planning cycle, so that operational data and analysis systematically inform capability planning.<br><br>*[numbering continues for another thematic area, as this concerns the entire problem driver* | *another thematic area, as this concerns the entire problem driver]* | year, creating an annual oversight mechanism to ensure the consistent translation of risk analysis and vulnerability assessment outputs into capability development and deployment decisions. |
| **Policy option 0 – Baseline** | **Policy option 1**<br><br>**Targeted modifications to address shortcomings and gaps** | **Policy option 2**<br><br>**Towards a more integrated EBCG** | **Policy option 3**<br><br>**EBCG based on standing corps and central role of Frontex** |
| 9. Problem Driver 3.2 – Quality assurance (vulnerability assessment and evaluation of the efficient use of resources) | | | |
| Without consistent enforcement of mitigation measures, persistent vulnerabilities are likely to continue.<br><br>Returns will remain outside the scope of the Frontex vulnerability assessment. The absence of vulnerability assessments for EU candidate countries will continue to be | Only measures concerning the scope of the VA would be proposed (without addressing the issue of the follow-up to the recommendations).<br><br>**PM 3.2.7** The scope of the VA would be broadened to cover returns logistics. The assessment would focus specifically on the capacity and | Option 1 +<br><br>**PM 3.2.13** The scope of the VA would be broadened to cover all aspects of EUROSUR data quality.<br><br>**PM 3.2.14** A graduated enforcement system would be introduced to ensure persistent | Same as Option 2 |

| | | | |
|---|---|---|---|
| a growing blind spot, given their direct relevance to the stability of the EU's external borders.<br>The VA's role in improving EUROSUR data quality will not materialise. | readiness of Member States to organise and monitor voluntary and forced returns once a return decision has been issued. This would include evaluating the availability of human, financial, and infrastructural resources necessary to carry out the logistical aspects of the return procedure.<br><br>**PM 3.2.8** The scope of the VA could be expanded on a voluntary basis to include EU candidate countries whose border management systems have a direct impact on the stability of the EU's external borders.<br><br>Synergies with SCH-EVAL would be reinforced to reduce the administrative burden on the Member States. | vulnerabilities identified by the VA are effectively addressed. To that end, the existing graduated response system to persistent vulnerabilities would be better framed in terms of the obligations of Frontex, Management Board and Member States. At a higher stage of escalation, the European Commission could adopt complementary measures until corrective actions are taken.<br><br>**PM 3.2.15** Necessary adjustments to enable control and follow-up via VA of the cases of non-submission or persistently low-quality updates of the EIBM strategic and integrated planning products.<br><br>**PM 3.2.16** Enhancement of quality control measures through the review of resources, structures and working methods of Frontex internal oversight bodies, as well as the Management Board, to maximise their efficiency and ensure their ability to provide appropriate support for Frontex's anticipated growth and expanded mandate. | |

# ANNEX 9: COMPARISON OF THE POLICY OPTIONS:

The evaluation scale:

| Thematic area | Baseline | | Option 1 | Option 2 | Option 3 |
|---|---|---|---|---|---|
| **Border management** | **0** | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | ++<br>+<br>++ | ++<br>+<br>++ | ++<br>+<br>++ |
| **Countering cross-border crime** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | ++<br>+<br>++ | ++<br>+<br>++ | ++<br>+<br>++ |
| **Emergencies and hybrid threats** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | **NA** | ++<br>+<br>++ | **NA** |
| **Visa policy** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | **NA** | ++<br>+<br>+ | ++<br>+<br>+/- |
| **EUROSUR** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>+ | ++<br>+/-<br>++ | +<br>+/-<br>+/- |
| **Cooperation with third countries and CSDP missions** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>**0** | +<br>+<br>+ | ++<br>++<br>++ |
| **Cooperation with international organisations** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>+ | ++<br>++<br>++ | ++<br>++<br>++ |
| **Returns** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>+ | ++<br>+<br>+ | ++<br>-<br>+ |
| **Organisational governance** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | **NA** | ++<br>+<br>**0** | ++<br>+/-<br>**0** |
| **Standing corps size, recruitment and distribution of resources** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>--<br>+ | ++<br>+/-<br>+ | ++<br>+/-<br>++ |
| **Employment conditions of the standing corps** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>+ | ++<br>++<br>+ | ++<br>++<br>+ |
| **Technical equipment and IT systems** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>+ | ++<br>+<br>++ | ++<br>++<br>+/- |
| **Standing corps training** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+-<br>+ | +<br>+<br>+ | ++<br>+<br>++ |
| **EIBM strategic and integrated planning** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>++ | ++<br>+<br>++ | +<br>+<br>++ |
| **Quality control mechanisms** | 0 | **Effectiveness:**<br>**Efficiency:**<br>**Coherence:** | +<br>+<br>+ | ++<br>+<br>++ | ++<br>+<br>++ |

| positive | slightly positive | mixed effect | no effect | slightly negative | negative |
|---|---|---|---|---|---|
| ++ | + | +/- | 0 | - | -- |

# ANNEX 10: ASSUMPTIONS FOR THE EXPANSION OF THE STANDING CORPS UNDER POLICY OPTIONS 1, 2 AND 3

This annex presents the assumptions motivating the proposed increases in standing corps size, included under Policy Options 1, 2 and 3.

*Summary of policy options on standing corps size and composition*

| | Baseline | PO1 | PO2 | PO3 |
|---|---|---|---|---|
| Category 1 | 3 000 | 9 000 | 3 000 | (at least) 5 000 |
| Category 2 | 1 500 | 4 500 | 1 500 | 1 500 |
| Category 3 | 5 500 | 16 500 | 5 500 | 5 500 |
| Category 5 | 0 | 0 | 20 000 | 18 000 |
| Total | 10 000 | 30 000 | 30 000 | 30 000 |

The assumptions reflect the evolving responsibilities of Frontex and the ambition to reinforce Frontex support to Member States at the EU's external borders, as well as in operations outside the EU and return activities. Such objectives are anchored in EU policy priorities, such as restoring a fully functioning Schengen area, strengthening returns systems and supporting Member States under migratory pressure.

Assumptions also take into account the operational context at the EU's external borders and strategic foresight around likely future threats and capability shortfalls. They reflect the need to create additional capacity for rapid and effective response to threats manifesting at the external borders, while maintaining sound EIBM principles to ensure seamless cooperation of all levels of EBCG.

Finally, the assumptions for expanding the size of the standing corps are also calibrated to remain consistent with the European Commission's political guidelines, which envisage a progressive increase of the European Border and Coast Guard workforce towards 30 000 officers[295].

The annex presents an overview of current gaps and consequences, linked to the operational context at the EU's external borders and EIBM uptake. It provides the assumptions underpinning the expansion envisaged in the different policy options. Assumptions draw on the latest available data and forward-looking planning documents.

***Gaps and consequences of Member State's crisis response capacity***

Despite improvements in EU border management over recent years, Member States face structural limitations in responding to large-scale or simultaneous crises at the borders. A direct consequence of continuous external border pressures is the increased reintroduction in internal border controls by Member States. The Schengen free-travel area has seen repetitive cases of reintroduced internal border controls often in place repeatedly since the 2015 migrant crisis[296]. Such measures, if continued or widened, undermine trust in Schengen and threaten the principle of free movement, one of the cornerstones of the EU integration. Moreover, maintaining internal border controls not only fragments Schengen but also reduces the overall manpower available where it is most needed – at the external borders which are under pressure due to irregular

[295] European Commission, Statement by President Ursula von der Leyen on the Commission's political priorities, 17 July 2024.

[296] State of Schengen report 2023

migration flows, hybrid threats and activities by smuggling networks.

While the European Commission has set a clear policy priority to restore a fully functioning Schengen, strong external borders are the prerequisite for a Schengen Area free of internal border checks. By bolstering the EU's ability to handle crises at the external frontier (through a dedicated reserve force) the justification for unilateral controls at the internal borders would be undermined.

The challenges faced by the Member States related to manning internal borders during reintroduced controls are part of a more general problem related to uneven capacity of EU border management. While reintroduction of internal border controls is a choice of the national authorities and concerns areas where Frontex has no mandate to act, it only proved the thesis that Member States rely on 'fragmented and reactive systems' that cannot scale effectively in major emergencies. Sudden increases in migratory flows therefore expose structural limits in national surge capacity and delay the initiation of joint operations[297]. Schengen evaluations show that almost half of all Schengen countries face shortcomings related to human resources, training, implementation of border check procedures[298]. National border services are already operating under high demand due to the implementation of EES and ETIAS. These recent developments require trained personnel at border-crossing points and consular posts, further reducing the margin for reallocating staff during a crisis.
When border emergencies occur, Member States first prioritise risks at their own borders rather than sending personnel to the most at-risk sections of the EU's external borders in another Member State. This can create challenges to deliver on agreed standing corps quotas without affecting national capabilities. It also leads to the general perception that personnel contributed to joint operations can 'deplete national capabilities', leaving Member States without adequate resources to sustain core functions[299].
All these elements demonstrate the need for a radical change of the approach, whereby the pool of adequately prepared and equipped professionals would be available at any time to perform tasks at national level or in another Member States, as part of the standing corps.

***Persistent external border pressures and evolving threats***
Europe's eastern flank faces unprecedented strains from hostile geopolitical manoeuvres. The series of Belarus-provoked incidents of 2021 at the EU external borders, explicitly condemned by EU leaders as a 'hybrid attack' instrumentalising migrants, demonstrated how quickly a external country can create surges in arrivals at the EU border. In the wake of Russia's invasion of Ukraine, migratory pressure on the EU's eastern borders remained high[300].. Threats in this region are highly unpredictable, driven by opaque political decision-making in Minsk and Moscow[301]. These hybrid tactics and conflict spillovers demand a robust, rapidly deployable EU force to support frontline Member States.

Ongoing instability across the Middle East and North Africa is likely to continue to foment heightened migratory flows in the Mediterranean. Frontex risk analysis highlights *multiple drivers*: renewed hostilities or regional escalation could prompt refugee outflows, while **protracted conflicts and economic downturns** in Syria, Afghanistan, and beyond continue to

[297] Frontex White Paper On reinforcing Frontex to future-proof the European Integrated Border Management.
[298] European Commission (2025). 2025 State of Schengen Report. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:3daaaadb-2021-11f0-b1a3-01aa75ed71a1.0001.02/DOC_1&format=PDF
[299] Frontex White Paper On reinforcing Frontex to future-proof the European Integrated Border Management.
[300] Belarus - Consilium. In 2023, 4 700 illegal entries via Belarus were recorded, a 236% increase over the prior year. The majority of arrivals were Afghans, Syrians, Turks and Iraqis
[301] https://www.frontex.europa.eu/assets/Publications/Risk_Analysis/Annual_Risk_Analysis_2024-2025.pdf

spur migration[302]. In sub-Saharan Africa, large-scale displacements (e.g. from Sahel conflicts or Sudan) are already impacting the Central Mediterranean route. Frontex analysis warns that adverse developments in the Sahel are likely to lead to further peaks in West African migration routes toward Europe. These scenarios point to sudden, large-scale influxes on Europe's southern shores, for which current resources (national and EU) may be insufficient.

High migratory pressure often coincides with security threats. Europol and Frontex assessments note that organised smuggling networks exploit any gaps in border control, and polarised global conditions mean high-risk individuals could attempt to infiltrate amidst flows. The migration strategy adopted on 29 January highlights security threats linked to irregular migration, particularly migrant smuggling, human trafficking, document fraud and the possible exploitation of migration routes by organised crime networks.

***Futureproofing external border management (2027–2041)***

Looking ahead, there is a need to anticipate long-term pressures rather than respond on a case-by-case basis. Frontex underlines that border management must move towards a more integrated, forward-looking approach, supported by sufficient and professionally trained human resources to meet emerging risks and technological changes. Border management planning should reflect an environment characterised by hybrid threats, geopolitical volatility and rapidly shifting migratory routes. The long-term expectation is that crises will remain multi-directional and may occur simultaneously on different sections of the border.

Futureproofing also requires the ability to activate 'multiple tactical response options', including quick-reaction units and specialised teams for emergency. The increased overall size of the standing corps would allow Frontex to maintain several response configurations in parallel, an essential requirement for the high-impact scenarios anticipated over the next decade.

The introduction of new EU-wide systems such as EES and ETIAS will strain further operational peaks for border authorities and national ETIAS units.

The State of Schengen Report and the Schengen Evaluation Mechanism highlight that ensuring a stable Schengen area requires sustained investment in external border capabilities and the capacity to deliver rapid assistance where needed. This aligns with the Commission's broader strategic direction to enhance preparedness, improve resilience at the external borders and ensure continuity of operations during crises.

**PO1:** In line with this, a substantial reinforcement of deployable capabilities is assumed to be justified in light of current pressures, anticipated future demands and the long-term requirements for maintaining an effective and resilient external border. A **gradual increase in standing corps Categories 1, 2 and 3 from 10 000 officers to 30 000 by 2041** is expected to significantly increase the EBCG's capacity to respond to the challenges described above.

***Gaps and consequences of limited EIBM uptake in the EBCG and limited hosting capacity among Member States***

While the linear growth proposed in PO1 would create the capability necessary to deal with any development at the external borders, it fails to address the equally significant shortcomings identified with regard to uptake of EIBM across the EBCG, the connected lack of common standards in border management and returns, and the limited hosting capacity of the Member State, among others.

The implementation of European Integrated Border Management (EIBM) represents a strategic

[302] https://www.frontex.europa.eu/assets/Publications/Risk_Analysis/Annual_Risk_Analysis_2024-2025.pdf

priority for the EU, to be spearheaded operationally by Frontex. Yet, the **implementation and operationalisation of EIBM remains challenging**, due to various reasons including a persistent fragmentation of practices, training, and systems at national level and vis-à-vis Frontex's own practices and systems. The currently limited implementation of EIBM as the standardised approach to border management and return limits the EBCG's impact: it creates artificial and undesirable barriers to the ability of deployed officers (regardless of whether they belong to the national authorities or Frontex) to provide efficient support, integrate quickly into the operational framework and deliver added value in the area of their specific expertise. This **limits the effectiveness, impact, and interoperability of the entire framework**, which hinges on the deployment of officers where they are operationally needed including away from their home Member State.

Moreover, Member States lack **hosting capacity**, meaning they have limited ability to support the deployment of Frontex standing corps for Joint Operations and other related activities in their territory, even in cases where their support is requested and needed. The various limitations to hosting capacity include, to a large extent, the limited availability of English-speaking officers. The Member States also lack the resources to sufficiently train their border guards to fulfil Category 2 and Category 3 requirements, order to successfully deploy them, especially in specialised profiles. The introduction of a framework to consistently train national officers, and thereby qualify them as Category 5 standing corps officers, aims to tackle and efficiently mitigate all these aforementioned issues. A well-trained Category 5 reserve would signal that the EU has not only improved its capability to absorb sudden migration inflows but has taken decisive measures to ensure that EIBM is equally strong and effective across all the EU's external borders. This in turn would create the conditions to safeguard Schengen's integrity even amid future challenges.

**PO2:** envisages the **introduction of 20 000 category 5 officers by 2041** as the EU's EIBM operational force and reserve personnel.

PO2 builds on the introduction of a new Category 5, endeavouring to ensure that the standing corps remains adaptable to future operational and strategic demands, while also more comprehensively addressing the aforementioned challenges related to the thus far limited uptake and implementation of EIBM across the EBCG. Category 5 officers would be required to complete a comprehensive EIBM-based training curriculum, delivered and funded by Frontex and aligned with the European Border and Coast Guard Training Strategy. Successful completion of this top-up training would allow officers to be formally registered as members of the Category 5 standing corps. Over time, this growing force of officers having received Frontex's EIBM-focused training will positively impact the EBCG's uptake of EIBM and the Member States' limited hosting capacity.

A permanent and centrally trained Category 5 reserve force supports capability alignment by providing a pool of officers certified according to uniform and consistently excellent EU standards, while ensuring that surge deployments maintain operational coherence with Member State border forces during peak pressure.

Moreover, and as described above, the current setup entails risks of capability imbalances. This is due to reliance on national contributions which are needed not only for the protection of the EU external border but also preserving the conditions necessary for the functioning of the Schengen area. Repeated deployments may deplete national services and lead to uneven operational readiness. In addition, Frontex points to the need for a 'baseline capability solution' at the EU's external borders and stresses that the future EBCG workforce should operate as a 'single operational ecosystem' based on interoperable procedures, common training standards and uniform certification[303]. This objective fully complies with the Treaty-based objective of

[303] Frontex White Paper On reinforcing Frontex to future-proof the European Integrated Border Management.

gradually introducing an integrated management system for external borders.

*Projected size and contributions for Category 5 under PO2*

To illustrate the approximate order of magnitude of the Category 5 reserve, who would be nominated for Frontex EIBM training, the table below applies to Category 5 the same proportional distribution across Member States as used for Category 4 which consisted of operational staff from Member States as reserve for rapid reaction and has been phased out in 2025. For each Member State, the indicative Category 5 reference quota is calculated by multiplying its Category 4 share of the EU total by the projected size of the Category 5 reserve by 2041. This approach reflects the functional similarity between the two categories, both of which rely on nationally-based officers available for exceptional deployments.

However, unlike Category 4 contributions being fixed on pre-determined numerical quotas, the Category 5 contributions would be introduced based on a capability need assessment, to be carried out jointly by Frontex and Member States. This could ensure that the reserve contains the specific profiles and assets required for different crisis scenarios. In practice, it is expected that only a subset of Category 5 officers would be deployed, depending on the specific crisis scenario and operational requirements, leaving this Category for most of the time at the disposal of the national authorities. Therefore, no *ex ante* estimate of deployable numbers is provided, and the table reports only indicative reference quotas.

*Reference quota for the introduction of Category 5*

| Country | Cat 4 quota | Share of total (%) | Cat 5 ref. quota 2034 (6 000) | Cat 5 ref quota 2041 (20 000) |
|---|---|---|---|---|
| Austria | 34 | 2.3 | 136 | 453 |
| Belgium | 30 | 2.0 | 120 | 400 |
| Bulgaria | 40 | 2.7 | 160 | 533 |
| Croatia | 65 | 4.3 | 260 | 867 |
| Cyprus | 8 | 0.5 | 32 | 107 |
| Czech Republic | 20 | 1.3 | 80 | 267 |
| Denmark | 29 | 1.9 | 116 | 387 |
| Estonia | 18 | 1.2 | 72 | 240 |
| Finland | 30 | 2.0 | 120 | 400 |
| France | 170 | 11.3 | 680 | 2 267 |
| Germany | 225 | 15.0 | 900 | 3 000 |
| Greece | 50 | 3.3 | 200 | 667 |
| Hungary | 65 | 4.3 | 260 | 867 |
| Iceland | 2 | 0.1 | 8 | 27 |
| Italy | 125 | 8.3 | 500 | 1 667 |
| Latvia | 30 | 2.0 | 120 | 400 |
| Liechtenstein | 0 | 0.0 | 0 | 0 |
| Lithuania | 39 | 2.6 | 156 | 520 |
| Luxembourg | 8 | 0.5 | 32 | 107 |
| Malta | 6 | 0.4 | 24 | 80 |
| Netherlands | 50 | 3.3 | 200 | 667 |

| | | | | |
|---|---|---|---|---|
| Norway | 20 | 1.3 | 80 | 267 |
| Poland | 100 | 6.7 | 400 | 1 333 |
| Portugal | 30 | 2.0 | 120 | 400 |
| Romania | 75 | 5.0 | 300 | 1 000 |
| Slovakia | 35 | 2.3 | 140 | 467 |
| Slovenia | 35 | 2.3 | 140 | 467 |
| Spain | 111 | 7.4 | 444 | 1 480 |
| Sweden | 34 | 2.3 | 136 | 453 |
| Switzerland | 16 | 1.1 | 64 | 213 |

**PO3: increase of Category 1 to at least 5 000 officers by 2041 and introduction of 18 000 Category 5 officers by 2041 as the EU's EIBM operational force and reserve personnel**

PO3 is based on the assumption that measures responding to Driver 2.1 proposed under PO1 and PO2 (as regards recruitment, career progression, retention and deployment incentives) are fully implemented. Additionally, PO3 takes into account the measures proposed in response to Driver 3.1 as regards EU-level training. It is also reflecting the increase of Frontex's responsibilities in border management, combating cross-border crime, visa policy, situational awareness, returns, and cooperation with non-EU countries as proposed under selected policy options for these thematic areas. These measures expand Frontex's mandate and are expected to lead to increased operational demand for long-term and specialised Frontex deployments in Member States and, where relevant, in non-EU countries. As such, measures proposed under PO3 are relevant to address all the identified problems. PO3 aims to address the same EIBM-related and hosting capacity-related challenges tackled in PO2 by proposing the same training framework for Category 5, albeit foreseeing lower numbers of participating officers.

The above-mentioned measures would justify sustained annual intake of new statutory staff of Category 1 officers from approximately 3 000 statutory officers by 2027 to a projected 5 000 officers by 2041. This is foreseen in parallel with the introduction of a new Category 5 for capability-harmonisation, following EIBM top-up training (as described in PO2 – see details above).

The increase of Category 1 reflects the clarification and expansion of Frontex's mandate, in particular as regards returns, Visa policy and training, but also crime detection officers and border and coast guard officers:

- Return: Making Frontex the default operational actor on return, and implementing a set of additional measures supporting this new Frontex role (e.g. mandating Frontex to proactively organise return operations, plan, match and pool resources, standardise return counselling and reintegration and establish a uniform standard for return monitoring), in line with the PM proposed for this area, would require a significant increase in the proportion of the standing corps working on returns, from the current +/- 200 staff envisaged for 2026 (just over 10%) of the current total Category 1 staff304.
- Visa policy: The measures linked to visa policy (PM 1.1.13; 1.1.14; 1.1.15) also assume an increase in staffing, possibly affecting both of Advanced-Level Document Officers (ALDOs), currently at a rate of approximately 8.7% of the Category 1 staff, and ETIAS Central Unit (expected to reach over 200 staff by 2027), among others.

304 Management Board Decision 8/2025 of 26 March 2025 adopting the European Border and Coast Guard standing corps annual planning for 2026 and indicative multiannual planning of profiles.

- Trainers: Assuming a trainer-to-trainee ratio of 1:8 (of the cat.1 and the new cat. 5 to be trained), the estimated requirement is for 250 trainers.

Additionally, the measures proposed to address problem 1 (PM 1.1.1; PM 1.1.2; PM 1.1.6; PM 1.1.7), might lead to increased demands for the following profiles:

- Border and coast guards: Measures such as better recognition of executive powers of the standing corps (PM 1.1.1), broadening the list of Frontex tasks (PM 1.1.2) or ensuring access for Frontex frontline duties (PM 1.1.6), are expected to increase demand for this profile. In the planning for 2026 (MB Decision 8/2025), over 50% of the standing corps Category 1 were identified as expected operational needs, making up the largest share of deployable standing corps. This tendency is expected to continue as Frontex needs to recruit for broad capability needs, and must retain a substantial proportion of officers who can be deployed flexibly across border checks, surveillance, hotspots, seasonal operations, and rapid-response situations.
- Crime detection officer: The measures proposed under PO1, clarifying the role of Frontex in countering cross-border crime (PM1.1.7), are also assumed to lead to an increased demand for this profile (in the planning for 2026, approximately 8% of the standing corps Category 1 were identified as expected operational needs).

Finally, the overall increase in size and tasks would also include an increase in the operational support staff ceiling

# ANNEX 11 COSTS ASSESSMENT [INCLUDING SIGNIFICANT ECONOMIC IMPACTS]

Introduction:

This assessment complements Section 6.1 of the Impact Assessment report as regards the costs which would be incurred exclusively by Frontex between 2028 and 2041 (i.e. not by Member States or the EU budget for borders, migration and security).

The table below provides an overview of the areas considered for the cost assessment, clarifying a distinction of the impact of each thematic area, in each option:

*Non-significant impact* indicates areas where the policy options are not expected to have any noticeable cost or saving implications that can be quantified.

*Low impact* indicates areas where the policy options are expected to have a minimal cost or saving implications, often due to minor adjustments in Frontex's current scope of activities.

*High impact* indicates areas where the policy options are expected to have large and significant cost or saving implications, often due to large expansions of Frontex's mandate or capabilities.

*Overview of areas considered for the cost assessment*

| Thematic area | PO1 | PO2 | PO3 |
|---|---|---|---|
| ***Border management and hosting capacity*** | Non-significant | Non-significant | Non-significant |
| ***Countering cross-border crime*** | Non-significant | Non-significant | Non-significant |
| ***Emergencies and hybrid threats*** | Non-significant | Non-significant | Non-significant |
| ***Visa policy*** | Non-significant | Non-significant | Non-significant |
| ***EUROSUR*** | Non-significant | Low impact | High impact |
| ***Cooperation with third countries and CSDP missions*** | Low impact | Low impact | Low impact |
| ***Cooperation with international organisations*** | Non-significant | Non-significant | Non-significant |
| ***Returns*** | High impact | High impact | High impact |
| ***Standing corps size*** | High impact | High impact | High impact |
| ***Employment conditions for the standing corps*** | High impact | High impact | High impact |
| ***Standing corps training*** | High impact | High impact | High impact |
| ***Technical equipment and IT systems*** | High impact | High impact | High impact |

| Thematic area | PO1 | PO2 | PO3 |
|---|---|---|---|
| ***EIBM management strategic and integrated planning*** | Non-significant | Non-significant | Non-significant |
| ***Quality control mechanisms*** | Non-significant | Non-significant | Non-significant |

The analysis focuses on the areas with 'high impact', namely standing corps (including training), technical equipment, returns and EUROSUR (as regards policy options 3).

The assessment is largely based on the analysis made in the study accompanying the impact assessment, applying therefore in most cases the same methodology and key caveats and limitations.

At the same time, for the following costs, different assumptions and/or base for calculations have been considered:

- **Staffing costs** are calculated based on the personnel costs for Temporary and Contract Agents, updated by DG BUDG at the latest applicable figures in January 2026;
- **The financial support under Article 61** is calculated based on the reference amount as provided in the EBCG Regulation, taking into account 100% capacity of Categories 2 and 3. For Category 1, the costs are calculated on the basis of Article 61(c) (*a one-off payment of 50 % of the reference amount multiplied by the number of operational staff recruited by Frontex as statutory staff),* for Category 2 they are based on Article 61(a) *(100 % of the reference amount)* multiplied by the number of operational staff indicated for secondment in accordance with Annex II, and for Category 3, in line with Article 61(b) *(37 % of the reference amount)* multiplied by the capacity of Category 3 in line with Annex III. In line with Article 61(2), the reference amount corresponds to the annual basic salary for a contract agent in function group III, grade 8, step 1[305];
- **Deployment costs**
  - For Category 1, deployment costs include mission costs for deployment in non-EU countries, and allowances linked to arduous working conditions[306]. Seconded staff, i.e. Category 2 of standing corps officers, is considered to be deployed in the different operational areas (including headquarters). The main costs will be therefore related to deployments, ensuring consistency with the rules applicable to allowances and reimbursements of the deployable statutory staff. These include relevant allowances linked to working conditions (e.g. shift work, standby duties, arduous conditions) and mission costs for deployments outside the EU.
  - Deployments for Category 2 and 3 are considered for 100% of Category 2 and 3 capacities. This reflects the assumptions for the expansion of the standing corps under the different policy options proposed in the impact assessment (see Annex 10).
  - For cat. 3 and cat. 5, the deployment costs are calculated on the basis of unit costs[307] defined in the feasibility study. The reliance on these unit costs is based on 2024 as the latest available data.

[305] The reference amount used is updated at the latest available figures from July 2025, amounting to 3 475.62, multiplied by 12.
[306] The estimates for this allowance are based on the currently applicable cumulative ceiling between shift work and arduous work.
[307] The 'unit costs' for different expenditure categories are calculated based on the analysis of the feasibility study

- As these costs are considered per unit per year, they are reduced by taking into account the duration of deployments for Categories 3 and 5 (4 months for Category 3 and assumed at 6 months for Category 5).

- **Training costs**
  - Costs for Category 1 basic training are based on Frontex estimates for the establishment of a training centre in Warsaw catering for approximately 600 learners[308]. As the training centre is envisaged to be established within 50 km from Frontex Headquarters, this implies that statutory staff would not be on mission for the duration of the training. Mission-related costs have therefore not been taken into account.
  - The % of Category 2 and 3 officers to be trained each year is considered in line with the analysis of the feasibility study[309]. However, as 100% deployment capacity is assumed, the % is calculated based on the total number of Categories 2 and 3 to be seconded and nominated each year.
  - Category 5 officers are assumed to receive the top-up training only once and it is assumed that this training will be centralised in Warsaw. The costs for the rental of the training centre estimated by Frontex for 600 Category 1 officers are scaled up in PO2 and PO3 to cater for trainings of Category 5 and a higher number of Category 1.

The following additional limitations are highlighted:

- Overall, the costs estimates are based on generic assumptions. It is expected that the detailed costs and human resources will be further defined at a later stage.
- The reliance on unit cost estimates based on expenditure in 2024 as a starting point. 2024 is generally considered a relatively stable year without any significant crises. Consequently, the estimates may understate the potential cost implications of large-scale or crisis-driven deployments.
- The staffing costs are based on the figures as of 2026 and no inflation has been taken into account. The cat. 1 staffing costs and the HQ staff costs are calculated by taking the correction coefficient for place of employment being Warsaw, Poland into account.
- The training centre costs are based on the initial rental estimation made by Frontex with the capacity to train 600 officers. It is therefore assumed that, considering a scaling up of the costs based on the increasing number of learners will cater for the increased capacities. The estimates for the purchasing of a building for training activities, which might require a substantial initial financial commitment to establish and acquire all necessary capabilities to deliver large-scale training and lower subsequent running costs for delivering the actual training courses, have not been considered in the cost assessment.
- The amount of savings linked to the deployment costs are dependent on the actual deployment/employment locations and on the relevant allowances applicable when relocating to a different place of employment.

The number of standing corps officers is based on the policy scenario of reaching a total of 30 000

accompanying the impact assessment, which take as a reference the total expenditures registered by Frontex in 2024. The relevant unit costs are then multiplied by the applicable number of SC officers each year between 2028 and 2041, to generate the total cost estimates. In the case of training, deployment or Article 61 compensation, the unit costs are only multiplied by the number of SC officers assumed to be trained, deployed or eligible for compensation.

[308] EBCG Academy Training Centre – building project Early information in accordance with Art. 272(2) of Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast)

[309] The feasibility study accompanying the impact assessment considers respectively 44% and 8% of Category 2 and 3 FTE officers in Frontex in 2024.

across all categories by the end of 2041. The size and composition of standing corps in the respective policy options is assumed as follows:

- **PO1:** The current number of standing corps categories is gradually increased over the two MFF periods, reaching respectively 9 000 Category 1, 4 500 Category 2 and 16 500 Category 3.
- **PO2:** The current number of standing corps categories remains stable through the two MFFs (respectively at 3 000 Category 1, 1 500 Category 2 and 5 500 Category 3). At the same time, a new Category 5 as EU's EIBM operational force and reserve personnel is established. This category is envisaged to grow to 20 000 by 2041.
- **PO3:** The current number of standing corps Categories 2 and 3 remain stable through the two MFFs. Category 1 is expected to gradually grow to at least 5 000 officers by 2041, while Category 5 (established in line with PO2) is envisaged to reach 18 000 by 2041.

*Assumptions on the development of the standing corps (2028-2041) for the purpose of the cost assessment*

| | Policy option 1 | | | Policy option 2 | | | Policy option 3 | | |
|---|---|---|---|---|---|---|---|---|---|
| | 2028 | 2034 | 2041 | 2028 | 2034 | 2041 | 2028 | 2034 | 2041 |
| **Cat. 1** | 3 000 | 5 500 | 9 000 | 3 000 | 3 000 | 3 000 | 3 000 | 3 750 | 5 000 |
| **Cat. 2** | 1 500 | 2 750 | 4 500 | 1 500 | 1 500 | 1 500 | 1 500 | 1 500 | 1 500 |
| **Cat. 3** | 5 500 | 9 000 | 16 500 | 5 500 | 5 500 | 5 500 | 5 500 | 5 500 | 5 500 |
| **Cat. 5** | 0 | 0 | 0 | 0 | 6 000 | 20 000 | 0 | 6 000 | 18 000 |

*Overview of cost assessment of the areas with high impacts for each policy option (EUR million), taking into account existing costs and the impact of policy measures:*

| Thematic area | PO1 | | PO2 | | PO3 | | Preferred Option | |
|---|---|---|---|---|---|---|---|---|
| | MFF1 | MFF2 | MFF1 | MFF2 | MFF1 | MFF2 | MFF1 | MFF2 |
| **Returns** | 1 337 | 1 910 | 1 143 | 1 668 | 1 168 | 1 592 | 1 143 | 1 668 |
| **Standing corps size (including HQ and training)** | 9 117 | 16 352 | 6 547 | 7 093 | 6 632 | 8 371 | 6 632 | 8 371 |
| **Technical equipment** | 1 831 | 2 478 | 1 704 | 1 956 | 1 918 | 2 535 | 1 704 | 1 956 |
| **Other** | 868 | 900 | 954 | 985 | 954 | 985 | 954 | 985 |
| **Total*** | **13 153** | **21 640** | **10 348** | **11 702** | **10 672** | **13 483** | **10 433** | **12 980** |

*The totals are not adjusted for inflation.

***Standing corps size (including HQ and training)***

*Staffing costs – HQ staff (all policy options)*

The average personnel costs applicable as of January 2026 are used for the estimates on human resources, respectively at EUR 194 000 per year for TA, EUR 105 000 per year for CA and EUR 108 000 per year for SNE. The average costs include an amount corresponding to operating expenditure, mainly building and IT-related costs (EUR 31 000 per year). Given the expansion

of Frontex's mandate and the growth of the standing corps, Frontex's HQ staff (which is not part of Category 1) is assumed to gradually grow from the current 1 000 staff to 2 000 staff by 2041. The current proportion of TA, CA and SNE is maintained (respectively at 55%, 23% and 22% of the total).

The total cost for HQ staff is estimated at EUR 1 billion in the first MFF and 1.5 billion in the second MFF.

*Staffing costs – standing corps Category 1*

The proportion of TAs and CAs are assumed at 50/50.

**PO1:** Category 1 is expected to reach 5 500 by 2034 and 9 000 by 2041. This would account for EUR 3.5 billion in MFF1 and EUR nearly 6.5 billion in MFF2.

**PO2:** Category 1 is expected to remain stable at 3 000 through the two MFF periods. This would account for EUR 2.58 billion in each MFF period.

**PO3:** Category 1 is expected to reach 3.750 by 2034 and 5 000 by 2041. This would account for EUR 2.86 billion in MFF1 and EUR 3.8 billion in MFF2.

***Employment conditions for the standing corps***

The place of deployment of the standing corps will no longer be administered in line with the mission system as a default rule but will be considered, in most cases, as their place of employment for the purposes of the Staff Regulations and the Conditions of Employment (long-term deployments in Member States). This will rationalise the system of financial allocations mainly for standing corps Category 1, making it better tailored for long-term operational service, and reducing its financial and administrative impact. While relevant allowances are already applicable to standing corps officers Categories 1 and 2 depending on specific tasks and working conditions (shift work, standby duties), it is envisaged to widen their applicability to all relevant work patterns[310]. Allowances linked to arduous working conditions also become applicable, with estimates included under deployment costs.

*Deployment costs*

The total deployment costs based on the current mission system (including daily subsistence allowance, accommodation, transport) are calculated by multiplying the deployment unit costs as indicated above by the number of standing corps officers assumed to be deployed in a given year.

This method does not calculate deployment costs based on the current system of daily subsistence allowance (DSA), but it is instead based on the actual expenditure incurred by Frontex in a given year.

**PO1**: The number of officers to which deployment costs are attributed is based on the following assumptions:

- **Deployable Category 1 officers** are equal to the total number of Category 1 officers minus operational support staff, assumed to be 10% of the combined total number of Category 1, Category 2 and Category 3, and minus ETIAS staff. Additionally, all Category 1 new entrants receive basic training in their first year. Deployment costs are therefore assumed to occur only from the second year after recruitment.

[310] Considered under staffing costs.

- Deployments of **Categories 2 and 3** are assumed at 100%. However, this might need adjustments to reflect the possible impact deriving from (1) the growth of Category 1, (2) the actual needs / requests from Member States as per the migration situation and (2) the hosting capacities of Member States most affected.

**PO2 and PO3:** the same assumptions apply as above. In addition, the following assumptions apply for the deployment of Category 5:

- The unit cost of Category 3 is applied, reflecting the fact that they would only be called on for emergency deployments, which are assumed to be relatively short-term in nature. This is similar to the current situation, in which Category 3 officers, and in principle Category 4, face similar deployment costs[311].
- **Category 5 officers** are assumed to be deployed twice per MFF period for an approximate duration of 6 months, with a number of 300 officers per deployment.

Overall, the total deployment costs for all categories for each policy option would be as follows:
- PO1: nearly EUR 1.9 billion for the first MFF period and EUR 3.6 billion for the second MFF.
- PO2: EUR 1.5 billion for each MFF.
- PO3: nearly EUR 1.5 billion for the first MFF and EUR 1.6 billion for the second MFF.

*Financial support for the development of the standing corps (Article 61 compensations)*

The costs assessment for the financial support mechanism provided to Member States and Schengen Associated Countries is based on Article 61 of the EBCG Regulation[312] and on the relevant reference amount established in it[313].

The following assumptions have been applied per category:

- For **Category 1**, compensation applies to 3% of officers, consistent with the proportion of category 1 officers eligible for compensation in 2024.
- For **Category 2 and Category 3**, compensation applies to 100% of deployed officers.
- For **Category 5 (applicable for PO2 and PO3)**, the Category 3 calculation methodology has been applied. This reflects an implicit assumption that, on average, training for Category 5 would be short-term, similar to Category 3.

For the purpose of the cost assessment, it is assumed that the current financial support system for Member States under Article 61 remains unchanged and is applied to Category 5 deployments, as it would have been for Category 4 had it been deployed. The impact assessment considers simpler, more flexible and fairer alternatives; however, since Member State contributions depend

[311] Frontex. (2023). *Management Board decision 4/2023 of 24 January 2023 on financing deployments of operational staff, Category 3 and Category 4, of the European Border and Coast Guard Standing Corps.*
[312] *(a) 100 % of the reference amount multiplied by the number of operational staff indicated for the year N + 2 for secondment in accordance with Annex II; (b) 37 % of the reference amount multiplied by the number of operational staff effectively deployed in accordance with Article 57 within the limit set in Annex III and in accordance with Article 58 within the limit set in Annex IV, as applicable; (c) a one-off payment of 50 % of the reference amount multiplied by the number of operational staff recruited by Frontex as statutory staff;*
[313] *The reference amount must be equivalent to the annual basic salary for a contract agent in function group III, grade 8, step 1, as set out in Article 93 of the Conditions of Employment and subject to a correction co-efficient applicable in the Member State concerned.*

on bilateral negotiations, it is not possible to predict the financial effects compared to the current system.

An alternative measure envisages moving this financial support under the BMV funding instrument in the new MFF (2028-2034). This change could be applied for all categories, generating significant savings for Frontex budget, depending on the different policy option (approximately EUR 2.56 billion for PO1 in MFF1,EUR 1.3 billion in PO2 and EUR 1 billion in PO3). At the same time, the modalities of this option are still being explored and remain dependent on the outcome of the MFF negotiations.

Overall, the total financial support under Article 61 for all categories and for each policy option would be as follows:

- PO1: EUR 2.56 billion for the first MFF period and EUR 4.7 billion for the second MFF.
- PO2: nearly EUR 1.3 billion for each MFF.
- PO3: EUR 1 billion for the first MFF and EUR 1.26 billion for the second MFF.

*Training costs for all categories*

It is assumed that the training capacities will be adjusted so that they are sufficient for the proposed expansion.

To compute total training costs, unit costs are multiplied by the number of SC officers assumed to undergo training in each year. In line with Frontex's classification, training costs are distinguished into the following categories and related assumptions:

- Category 1 basic / entry-level training. All Category 1 new joiners receive basic training in their first year. As a result, subsequent specialisation trainings are assumed to occur only from the second year after recruitment. The costs are aligned with the ones envisaged for the training centre.
- Category 1 specialisation (including profile) training. 60% of Category 1 officers undergo a profile-related specialisation training every year, one year after recruitment. These training costs are based on the number of deployable standing corps officers which is calculated by taking into account the difference between the number of officers recruited and the number of HQ support staff.
- Category 2 training. 44% of Category 2 officers are trained each year.
- Category 3 training. 8% of Category 3 officers are trained each year.
- Category 5 training (applicable for PO2 and PO3). 100% of the newly appointed Category 5 officers are trained each year. The unit costs for training Category 5 officers have been assumed at approximately EUR 7 693 per learner (see feasibility study accompanying the impact assessment).

Overall, the total training costs for all categories for each policy option would be as follows:

- PO1: nearly EUR 43 million for the first MFF period and EUR 74 million for the second MFF.
- PO2: EUR 98 million for the first MFF and EUR 193 million for the second MFF.
- PO3: nearly EUR 97 million for the first MFF and EUR 180 million for the second MFF.

*Costs of the training centre*

In addition to the costs of training, the assessment incorporates the planned establishment of a **training centre in Warsaw**.

The rental costs for the training centre are based on Frontex preliminary assumptions, estimating this at approximately EUR 2.5 million/year for 600 learners. The costs are however scaled up

proportionally to the envisaged increased number of learners (Category 1 and Category 5), depending on the respective Policy Option.

***Technical capabilities – economic impact and cost assessment***

This thematic area covers the economic impacts linked to Frontex's technical capabilities, notably the TEP, state-of-the-art situational awareness tools, and the provision of mobile and portable equipment for standing corps deployments. Under Policy option 3, it also covers the potential shift from the current service-based and Member State pooled model towards EU-owned strategic aerial and maritime surveillance assets.

*Key assumptions (all policy options)*

- Frontex provides personal, portable and mobile equipment for standing corps Categories 1 and 2.
- Categories 3 and 5 are deployed with Member State-owned equipment and uniforms.
- Member State contributions to the TEP are assumed to remain broadly at current levels, given uncertainty on future co-financing under specific actions.
- Where enforcement measures are introduced (Policy options 2 and 3), compliance requirements and identified gaps in TEP availability are assumed to increase in the short term as reporting becomes more complete.

**PO1 and PO2:** Frontex continues to lease or rent aerial surveillance services under framework contracts, while maritime surveillance assets remain primarily pooled from Member States. Incremental costs are expected mainly from expanding and modernising the TEP in line with the European Border Surveillance Reference Architecture (EBS-RA). The overall costs technical equipment under PO1 are estimated at nearly 1.83 billion (2028-2034) and 2.47 billion (2035-2041) and for PO2 are estimated at nearly EUR 1.7 billion (2028-2034) and EUR 1.95 billion (2035-2041).

**PO3:** Under the 'own' scenario, Frontex would progressively acquire and operate large aerial assets (fixed-wing aircraft and unmanned aerial vehicles) and selected maritime assets (coastal patrol boats (CPB) and coastal patrol vessels (CPV), and potentially offshore patrol vessels (OPV)). This would entail significant upfront capital expenditure (asset purchase) and recurring operating expenditure (maintenance, insurance and contracted support), as well as additional enabling infrastructure and staffing (e.g. operational bases, hangars, docking/shipyard arrangements and specialist crews).

The overall costs for technical equipment under PO3 are estimated at nearly EUR 1.9 billion (2028-2034) and EUR 2.53 billion (2035-2041). These estimates assume a progressive replacement of Member State–pooled assets by 2041. Alternative mixes (e.g. limiting Frontex ownership to CPB/CPV while relying on co-financing or chartering for OPVs, including the use of host Member State crews) would materially change the capital expenditure and operating expenditure profile and infrastructure requirements. Other technical equipment (e.g. vehicles, mobile surveillance systems, PPE/uniforms and portable detection equipment) is costed on the basis of historical framework contract values and scaled proportionally with Category 1 and 2 deployments; for reference, in 2024 this corresponds to approximately EUR 5 000-6 000 per deployed Category 1/2 officer.

***Return***

*Baseline for all policy options*

The baseline costs are derived by taking the cost for returns for 2024 as basis and assuming an

8% growth rate per year until 2034[314]. From 2034 onwards, a more moderate growth rate of 2% per year is assumed, due to the uncertainty about future developments in returns. In line with historical patterns and experts' opinions, the number of returns (measured as the number of returnees) implemented with Frontex support is assumed to be 60 000 per year. This figure increases annually in to the assumed growth rate of associated costs. While PO2 and PO3 would introduce a major shift in Frontex's role on return and envisage expanding the scope of return activities also in and from non-EU countries, it was not possible to capture the full extent of these costs, which might lead to an increase in the number of returnees processed by Frontex compared to the assumed growth.

*Coordination in returns (PO2 and PO3)*

The possible costs linked to an expanded role of Frontex on digital matters are not addressed here. Additional governance costs are estimated at 2.5% of baseline costs for option 2 and 5% for option 3[315].

The savings linked to improved returns coordination are calculated as follows:

- Operational savings on charters (seat-fill and pooling): 15% of the unit charter cost (EUR 6 000) multiplied by the number of charter returnees (assumed 22% of all returnees).
- Savings due to reduced booking or aborting of scheduled forced returns: 10% of the unit cost per forced returnee (EUR 3 414) multiplied by the number of forced returnees (assumed 40% of all returnees).
- Savings due to fewer wasted charter seats: 2% of the unit charter cost (EUR 6 000) multiplied by the number of charter returnees (assumed 22% of all returnees).
- Savings due to shift to voluntary returns: under option 2, the share of voluntary returns (assumed at 60% in 2028) increases by 0.5% each year; under option 3, by 1% each year. Savings are calculated based on the cost differential between voluntary (EUR 560) and forced (EUR 3 414) returns.
- The resulting figures relate to Frontex-assisted returns and only reflect the cost savings incurred by Frontex. While savings for Member States are to be expected, it is beyond the scope of this assessment to calculate them.

***EUROSUR (PO3)***

This assessment covers the financial costs of the technological (IT-related) nature generated by the expansion of the scope of EUROSUR as information exchange and operational cooperation framework. It does not cover the costs related to state-of-the-art surveillance tools as these were presented above.

The extension of the scope of EUROSUR to cover return-related information, the direct access of Frontex to the outputs from the national surveillance assets as well as the development of the in-house AI tools will be the most resource-intensive measures under this option. It will involve the development of entirely new features of EUROSUR which will add to the complexity of the

[314] The growth rate is the same as in the 2028-2032 scenario 1 ('Growth of the current scope of operations') in the Frontex note with technical budgetary simulations. However, the cost estimates provided in that note for 2028-2032 were not considered, as they implied an annual rate of growth of 37%, which was deemed unjustified based on historical trends. Additionally, costs were adjusted to avoid double-counting with deployment costs of Frontex staff; based on Frontex reports on return operations between 2021 and 2023, the share of annual return costs linked to Frontex staff on board is estimated at around 11%.

[315] While this is a relevant development, its assessment is outside the scope of this exercise and the study in general. However, it is taken into account when assessing the policy options and their cost implications.

existing IT architecture.

The ICT-related costs are linked to the development of the IT applications and information systems, but also to the availability of sufficient talented ICT specialists to deliver necessary services. This remains a challenge as the ICT market is volatile, and good experts are in high demand. Furthermore, the costs of hardware, licences, maintenance and outsourcing are likely to increase due to inflation, high demand and volatile market situation[316].

As an example, the development of only one new feature of EUROSUR under the EBCG Regulation cost Frontex around EUR 14 million in total. This comprised the development of the business infrastructure, engagement of the external IT services and establishment of the security environment for EUROSUR. At the same time, the development of one IT project costs EUR 8.5 million annually[317], excluding maintenance and administration.

These figures represent only the implementation costs endured by Frontex. There are separate investments to be made at the national level by Member States. Depending on the scope of modifications to be made into the existing business architecture following the extension of the scope of EUROSUR to include new data sets under this policy option, the financial implications may vary. As this is not possible to provide accurate estimates of the endured costs related to the implementation of the measures under this policy option, they have not been included into the final cost calculation.

***Other costs***

*Coordination with non-EU countries*

The calculation of costs associated with an expanded mandate in the area of cooperation with countries outside the EU is based on Frontex's past expenditure records[318]. To reflect the increased ambition of the policy options, it is assumed that the annual cost of cooperation with these countries will increase by 50% under PO1 and by 100% under policy PO2 and PO3.

*Existing and unchanged budget lines*

The following expenditure categories have been taken into account for the overall costs of the preferred policy option:

**Title 2 – Infrastructure and operating expenditure**: all costs under this title are included, except for the portion of ICT costs which are expected to increase in line with the size of the SCs and the potential expansion of EUROSUR to cover return-related information under Option 3.

**Title 3 – Operational expenditure**:

- Information and data analytics (24/7, EUROSUR under PO1 and PO2)

[316] Frontex ICT Strategy 2022-2027, Management Board Decision 55/2022 adopting Frontex Information Management Framework and ICT Strategy 2022-2027, Warsaw, 22 September 2022.
[317] Data for the work carried out in 2025.
[318] Based on the 2023 Consolidated Annual Activity Report, which provides a breakdown on the financial resources allocated to Frontex activities, including cooperation with non-EU countries. combined with the resources allocated under Title IV of the Frontex budget, namely the annualised amounts (the total project amount divided by the project's duration in years) of relevant grant agreements (Strengthening of Africa – Frontex Intelligence Community (AFIC), EU4BorderSecurity, IPA III migration (Phase 3), IPA III security).

- Strengthening capacities
- ETIAS

These areas are assumed to be largely unaffected by the policy options. For 2028, the values for these categories are taken from Frontex note on technical budgetary simulations, scenario 1. From 2029 onwards, these values are assumed to grow linearly at a rate of 2% per year.

# ANNEX 12: DISCARDED OPTIONS

This Annex describes policy measures which have been discarded for technical reasons (e.g. not feasible to set up practically), legal reasons (e.g. the EU does not have a mandate to act in a specific field or would require additional legal basis for the EBCG Regulation), or reasons related to stakeholder support (e.g. the majority of relevant stakeholders are against a proposed measure). These measures were discarded at an earlier stage and therefore have not been assessedfor impact.

**Search and Rescue**

The assessment of potential amendments to the Frontex mandate regarding Search and Rescue concluded that such changes would be neither effective nor feasible, primarily due to legal reasons. The overarching legislative framework is grounded in international maritime law. Regulation 656/2014 applies this framework and further defines Frontex's role in maritime border surveillance. Within this context, Frontex has supported Member States in SAR activities through joint or multipurpose operations.

However, Frontex does not have a mandate to conduct independent search and rescue (SAR) operations and may only support Member States within the framework of Joint Operations and/or under coordination of national Maritime Rescue Coordination Centres (MRCCs). Frontex involvement is therefore subject to the leadership of Member States or external countries and takes place under the command of the relevant MRCCs coordinating SAR operations. Any changes in this regard would require changes in international law.

**Situational awareness**

The assessment of potential amendments to the Frontex mandate regarding Search and Rescue concluded that such changes would be neither effective nor feasible, primarily for legal reasons. The overarching legislative framework is grounded in international maritime law. Regulation 656/2014 applies this framework and further defines Frontex's role in maritime border surveillance. Within this context, Frontex has supported Member States in SAR activities through joint or multipurpose operations. However, Frontex does not have a mandate to conduct independent search and rescue (SAR) operations and may only support Member States within the framework of Joint Operations and/or under coordination of national Maritime Rescue Coordination Centres (MRCCs).

Frontex involvement is therefore subject to the leadership of Member States or non-EU countries and takes place under the command of the relevant MRCCs coordinating SAR operations. Any changes in this regard would require changes in the international legal framework. In the context of EUROSUR, several policy measures were initially considered but ultimately discarded. Among these was a proposal to require national authorities to systematically collect data on secondary movements in order to strengthen the European Situational Picture (ESP). The institutional setup at Member State level does not allow national authorities to collect secondary movements statistics[319].

Another discarded option concerned possible introduction of some results from the Vulnerability Assessment into EUROSUR. The interviews with Frontex indicated that while in theory some elements of the vulnerability assessment may add more clarity to situational awareness, the practical value for day-to-day operations remain unclear, leading to an undue administrative burden to Member State authorities. Moreover, the idea of including information from quality

[319] Interviews with EIBM Intelligence Division.

control mechanisms (such as SCHE-VAL or the Vulnerability Assessment at national and EU levels) into EUROSUR received rather low levels of support from Member States: 23% (8 out of 35 from 5 Member States) agreed[320] that this would enhance reaction capabilities, and 26% (9 out of 35 from 7 Member States) were neutral[321]. Another 31% (11 out of 35 from 10 Member States) disagreed[322], while 20% (7 out of 35 from 6 Member States) stated they did not know[323].

**Countering cross-border crime**

During the analysis of potential changes to the EBCG Regulation in relation to countering cross-border crime the possibility of expanding of Frontex's role in this area. This would allow Frontex to carry out crime detection activities (e.g. arrest, police patrol outside border areas) requiring the use of executive powers independently, without relying on prior authorisation from Member States.

However, this option was ultimately discarded. This is because measures expanding crime detection activities without depending on Member States' authorities by default would go beyond the current legal basis of the EBCG Regulation[324], implying that a different legal basis would need to be chosen to anchor this type of mandate. Such expansion would also risk creating duplication with Europol's mandate[325], which also remains strictly supportive to national authorities. While both police cooperation[326] and border management[327] relate to an area of shared competence under EU law[328], police cooperation/law enforcement is a particularly sensitive domain, where Member States' sovereignty remains primary[329]. Indeed, the option is not supported by the majority of national authorities that expressed a view on this issue[330].

**Emergencies**

The EU holds only a *supporting* competence in the field of civil protection, as outlined in Articles 6 and 196 TFEU. This means that national civil protection authorities remain primarily responsible for addressing and managing the consequences of natural disasters and other large-scale emergencies, including human-induced disasters. In addition, at EU level, coordination in the field of disaster response is already ensured by the European Commission (DG ECHO), which manages the Emergency Response Coordination Centre and the Union Civil Protection Mechanism (UCPM)[331].

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[320] BG, FI, FR (4), SK, ES
[321] AT, CZ, FI (2), HU (2), LT, NL
[322] BE, HR, DK, EL, LV (2), LU, MT, PL, SI, ES
[323] BG, DK (2), FR, DE, RO, ES
[324] Arts. 77(2)(b) an 79(2)(c) TFEU do not refer to preventing or combating cross-border crime. Art. 77(2)(b) only refers to 'carrying out checks on persons and efficient monitoring of the crossing of external borders'.
[325] Art. 88 TFEU indicates that Europol's mandate is 'to support and strengthen action by the Member States' police authorities and other law enforcement services'.
[326] Title V, Chapter 5 of the TFEU.
[327] Title V, Chapter 2 of the TFEU.
[328] Art. 4 TFEU.
[329] In that sense, Europol focuses on cooperation between police and other law enforcement authorities and Eurojust on cooperation between national investigation and prosecution authorities. In the case of Europol, some Member States are reportedly opposed to giving Europol autonomous executive powers and are expected to veto any move to strengthen Europol in this way. Cf. European Parliamentary Research Service. (2025, May 15). *Strengthening Europol's mandate* (Briefing No. PE 772.865). European Parliament. https://www.europarl.europa.eu/RegData/etudes/BRIE/2025/772865/EPRS_BRI(2025)772865_EN.pdf
[330] Interview with national authorities.
[331] The UCPM can be activated by Member States and UCPM Participating States in a wide range of emergencies, including natural disasters (such as floods, wildfires, earthquakes and storms), or other emergencies such as large-scale migration influxes, industrial accidents and attacks on critical infrastructure. The UCPM is activated when national capacities are insufficient to cope with the emergency.

Against this backdrop, a formal expansion of Frontex's mandate in this area is not considered necessary and would potentially duplicate with UCPM-related activities. Instead, the proposed policy measure (see Policy Option 2: Emergencies) would strengthen cooperation between Frontex and DG ECHO, ensuring that standing corps can support relevant national authorities when needed and requested, in a complementary manner to the assistance provided through the UCPM.

**Returns**

The option aimed at expanding Frontex's mandate to include Dublin transfers at the occasion of organising returns was discarded because such transfers fall under the EU asylum framework rather than the border management and return framework. The Dublin Regulation[332], based on Article 78(2)(e) of the TFEU, establishes rules for determining which Member State is responsible for examining an asylum application lodged in the EU. By contrast, the EBCG Regulation is grounded in Articles 77(2)(b) and (d) and 79(2)(c) TFEU, which relate to external border management and returns to countries outside the EU.

Extending Frontex's mandate to cover intra-EU Dublin transfers would therefore require a change in the EBCG Regulation's legal basis, shifting from the migration and border management provisions to those governing asylum cooperation. This would entail a fundamental alteration to the scope and purpose of the EBCG Regulation. Given that the Dublin framework already provides for bilateral cooperation and responsibility-sharing mechanisms between Member States, expanding Frontex's mandate in this area was considered legally unfeasible and beyond Frontex's current remit.

**Harmonisation and interoperability**

The gradual introduction of EU-wide recognition mechanisms in areas currently constraining Frontex's technical and operational capabilities was carefully considered. The establishment of a multilateral agreement to enable seamless cross-border deployment of Frontex-operated vessels and aircraft, supported by the harmonisation of certification and inspection regimes coordinated by EASA and EMSA, was examined. The possible adoption of a European mission flag or pennant, drawing on the fisheries control model, was also considered as a means of providing legal clarity and a visible operational mandate for EBCG assets and personnel operating across Member States and in international waters. In addition, the development of common operational directives, procedures, rules of behaviour, including the use of force, and administrative arrangements for joint operational areas involving host Member States, Frontex, other Member States and non-EU countries was analysed.

However, it was concluded that these measures cannot be effectively delivered through a revision of the EBCG Regulation alone. They would require intergovernmental agreements, alignment with sector-specific legal frameworks, and coordination with competent EU agencies and international partners that extend beyond the scope and legal effect of the Regulation. As such, while these options remain relevant from an operational and strategic perspective, they were ultimately discarded as part of proposed revisions to the Regulation, on the grounds that the challenges identified cannot be adequately addressed through amendments to the EBCG Regulation and are better pursued through complementary legal instruments, administrative arrangements, and operational cooperation mechanisms.

[332] Regulation (EU) No 604/2013 of the European Parliament and of the Council of 26 June 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 (recast).

**Employment conditions for the standing corps**

The evidence provided as part of the study identified several issues linked to promotion and career progression and early retirement. While some measures presented in the impact assessment can be implemented to partly address these issues, while remaining in line with the EU employment framework, other identified measures would require diverging from the Staff Regulations and might lead to potential spillover effects and impacts to the broader EU civil service, as they are not necessarily exclusively linked to a standing corps specific need.

These include the possibility of top-up pension or bridging allowance covering the period between the early-retirement age and the standard EU pension age of standing corps officers, transfer of national pension rights into the EU pension scheme, aligning the advancement across function groups/types of posts with the standing corps' function-based hierarchy and the establishment of a new financial right in the form of a deployment allowance based on hardship.

Because all EU staff (hence including staff in decentralised agencies) are subject to the same statutory provisions pursuant to the principle of universal coverage by the Staff Regulations, Frontex cannot establish independent or deviating staff schemes with regards to e.g. pensions benefits. Its founding regulation (adopted under Art. 77/79 TFEU) does not - and legally cannot - create an autonomous employment regime outside the Staff Regulations laid down pursuant to Article 336 TFEU.

**Organisational governance**

The evidence gathered as part of this study indicated that the main challenge affecting the organisational governance structure of the EBCG is the (limited) extent to which inputs from the working groups feed into the Management Board discussions, as well as the limited integration of return authorities into the governance structure. Hence, national authorities that chose to express a view on this issue did not support potential measures that would aim at completely re-design the governance structure.

While the overall governance structure was considered solid, its functioning and extent to which the Management Board is informed by work conducted by working groups (including the High-Level Round Table on return) is limited and should be strengthened. Based on the above, measures aimed at completely reshaping the EBCG governance have been discarded. Conversely, proposed measures aim at strengthening the mechanisms through which the working groups inform the Management Board, and better integrate return authorities in the overall governance framework.

## ANNEX 13: MONITORING AND EVALUATION FRAMEWORK (MEF) FOR THE PREFERRED POLICY MEASURES

| Thematic area/Preferred PO | Indicators | Sources | Data collection frequency |
|---|---|---|---|
| Border control (division of responsibilities, ambiguities and gaps affecting cross-border crime, hybrid threats/emergencies, visa policy)<br>**Policy Option 1=2** | • MS/SAC satisfaction level with the operational impact of deployed human resources (HR) and technical equipment (TE), including in countering cross-border-crime<br>• Number and person-days of deployed Standing Corps officers in joint operations, rapid border interventions or any other operational activities in the area of border management<br>• Efficiency of deployed resources<br>• Number and focus of EMPACT activities where Frontex is a leader/co-leader/participant versus number of overall EMPACT activities<br>• Number of OPLANs that include detailed provisions on Standing Corps support to national authorities to address emergencies/hybrid threats<br>• Number of requests from Member States to Frontex and DG ECHO/ERCC to address hybrid threats and emergencies<br>• Number of Frontex transverse activities contributing to improving operational results on detection and prevention of document and identity fraud<br>• Number of MS requesting risk analysis products related to documents fraud in non-EU countries | • Frontex Evaluation Reports of Joint Operations<br>• Working arrangements<br>• Frontex Consolidated Annual Activity Reports<br>• Operational Plans<br>• ETIAS-related reports<br>• MS/SAC satisfaction surveys circulated by Frontex<br>• Single Programming Document<br>• Vulnerability Assessments<br>• Assessment of the Operational Initiation document<br>• MB meeting minutes | Yearly |

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| | • Number and person-days of standing corps involved in delivering training to MS consulates<br>• Number of requests for operational personal data received from Europol and replied to by Frontex | | |
| EUROSUR<br>**Policy Option 2** | • Delivery of the milestones set in the EUROSUR programme roadmap<br>• Number of EUROSUR Fusion Services provided to core users<br>• Level of satisfaction of core users with provided EUROSUR Fusion Services<br>• Information on the state of play regarding the accreditation of (inter)connections (and their extensions) to the EUROSUR central component given by the EUROSUR Security Accreditation Board<br>• Overall state of data quality in EUROSUR as provided by Member States<br>• State of the interconnection of the EUROSUR European component with national components (possible challenges and mitigating measures)<br>• Timely production and distribution of reports by the Risk Analysis Unit<br>• Number of incidents reported in EUROSUR on internal security events or incidents of a hybrid nature | • Frontex Consolidated Annual Activity Reports<br>• Frontex Evaluation Reports of Joint Operations<br>• Frontex report to the European Parliament and the Council on the Functioning of EUROSUR<br>• EUROSUR data quality reports<br>• Single Programming Document | Yearly |

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| | • Timeliness of reporting to EUROSUR provided by Member States<br>• Number of data/information reported to EUROSUR by Member States as classified information and the level of classification<br>• Number of status agreements and working arrangements (with non-EU countries, international organisations, EU institutions, bodies, offices and agencies, CSDP missions) that include EUROSUR-related provisions | | |
| Cooperation with non-EU countries, international organisations and CSDP missions /<br>**Policy Option 3** | • Number of status agreements and working arrangements signed (or updated) (with non-EU countries, international organisations, EU institutions, bodies, offices and agencies, including CSDP missions), in comparison to a) negotiations that have not been opened despite there being a mandate to negotiate and the reasons why, b) negotiations that have been opened but have not been successfully finalised (and the reasons why)<br>• Number of Liaison officers deployed in relevant CSDP missions or international organisations and their activities<br>• Number and person-days of deployed Standing Corps officers in external countries<br>• Number of CSDP missions with which Frontex staff cooperates outside of working arrangements (ad hoc basis)<br>• Number of non-operational activities/projects undertaken in external countries<br>• Number of Frontex Liaison Officers (FLOs) deployed outside the EU, in comparison to a) negotiations that have not been opened despite there being a mandate and the reasons why, b) | • New/updated working arrangements and Status Agreements<br>• Frontex Consolidated Annual Activity Reports<br>• Frontex Evaluation Reports of Joint Operations<br>• Frontex reports on cooperation with non-EU countries<br>• Single Programming Document | Yearly |

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| | negotiations that have been opened but have not been successfully finalised (and the reasons why) | | |
| Returns/<br>**Policy Option 2** | • Number of non_EU nationals returned (or supported in returning voluntarily) with Frontex support, including number of those returned with Frontex support departing from a non-EU country<br>• Number of Frontex-organised return operations<br>• Ratio of monitored return operations<br>• Ratio of identification assistance provided<br>• Number of reintegration cases through the EU Reintegration Programme<br>• Number of Member State staff trained by Frontex on return and reintegration counselling<br>• Ratio of FRESO deployed versus number of MS' requests for FRESO<br>• Enumeration of developed guidelines/good practices for the standardisation and/or optimisation of returns aspects/processes<br>• Number and mission-days of EURLOs deployments<br>• Enumeration of events related to contribution in the implementation of EU return policy<br>• Enumeration of technical assistance projects for non-EU countries on return, readmission and reintegration<br>• Number and enumeration of non-EU countries supported with return operations (collecting return operations or other return operations)<br>• Number of meetings of High-Level Round Table on Returns<br>• Number of recommendations by the High-Level-RoundTable on Returns | • Return operations reports<br>• Frontex reports on the evaluation of the return operations<br>• EURLO regular reporting to Frontex<br>• EU Reintegration Programme Annual Reports<br>• Frontex Consolidated Annual Activity Reports<br>• Relevant internal and external audit reports<br>• HLRT minutes/reports Management Board<br>• Single Programming Document | Yearly/Biannual |

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| Governance and oversight / **Policy Option 2** | Fundamental rights<br>• Timely request by the Executive Director to FRO for opinions before signing OPLANs, WAs.<br>• Timely delivery of FRO opinion on requests by the Executive Director.<br>• Number of monitored operational actions per host Member State/non-EU country and monitored return activities<br>• Ratio of denied access to FRO/FROMs to operational areas and relevant documents and activities (by national authority)<br>• Number of field monitoring days reported in the FRO reporting system<br>• Timely reporting on follow-up to FRO's recommendations<br>• Timely involvement of Consultative Forum on matters related to breaches of fundamental rights<br>• Number of SIR and complaints, investigations and degree of cooperation of Agency and relevant national authorities, including their findings and follow up.<br>• Timely delivery of Fundamental Rights Impact Assessments and Fundamental Rights Due Diligence (on TC cooperation)<br>• Number of replies to FRO opinions and CF recommendations<br>Data protection<br>• Guidelines and SOP covering all relevant processing activities<br>• Timely delivery of Transfer Impact Assessments (TIAs) and Data Protection Impact Assessments (DPAs) | • Frontex Consolidated Annual Activity Reports<br>• Frontex FRO Annual Activity Reports<br>• FRO monitoring tool (OCEAN)<br>• Consultative Forum on Fundamental Rights annual reports<br>• SIRs<br>• Frontex DPO Annual Compliance Reports<br>• MB Decisions<br>• MB meeting minutes<br>• HLRTR meeting minutes and recommendations<br>• Internal and external audits<br>• Single Programming Document<br>• Publicly available studies/evaluations | Yearly (MB reporting) |

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| | • Number of training sessions on data protection, units and entities involved, number of sessions delivered to field presences, number of processors of personal data reached<br>• Number of guidelines on data protection issued and followed up by Frontex<br>• Timely DPO advice related to DPIAs and TIAs<br><br>Other governance and oversight elements<br>• Timely completing of reporting obligations towards the MB and other external entities, as well as publishing public information<br>• Follow-up to any recommendations from relevant scrutiny bodies and external evaluations<br>• Annual Activity Reports and Single Programming Document timeliness and legal compliance<br>• Number of documents delivered meeting set timelines for MB meetings, Working Group on Budget and Accounts, EIBM Working Group | | |
| Employment conditions of the Standing Corps /<br>**Policy Option 2** | • Percentage (%) of job offers sent to candidates within calendar year, versus the allocated vacant posts as of January in the same year<br>• Occupancy and turnover rates<br>• Number of internal reassignments and internal mobility<br>• Number of MS nationalities that are over- and under-represented within the Standing Corps<br>• Implementation of Frontex Human Resources Strategy<br>• Data on contract renewals | • Recruitment and turnover rates from HR management reports<br>• Human Resources Reports<br>• Audits on HR Planning Allocation and Recruitment<br>• Single Programming Document<br>• Frontex Consolidated Annual Activity Reports<br>• Updates on HR Strategy implementation | Yearly |

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| Standing Corps size and composition /<br>**Policy Option 3** | • Overall number and person-days of HR (SC and other relevant staff and host MS co-financed staff) deployed during the operational activity<br>• Overall number of standing corps recruited, seconded, nominated, or trained<br>• Member States satisfaction with the operational impact of deployed HR<br>• Ratio of SC officers assigned to general operational functions<br>• Percentage of deployment periods per operational year where there is a gap between confirmed commitments and uncovered needs | • Frontex Evaluation Reports of Joint Operations<br>• Quarterly report on capabilities/ report on capabilities development to MB<br>• Annual Implementation report<br>• Single Programming Document<br>• Frontex Consolidated Annual Activity Reports<br>• Vulnerability Assessment<br>• Updates on HR Strategy implementation | Yearly/Quarterly |
| Technical equipment and IT systems /<br>**Policy Option 2** | • Overall number of asset-days of maritime, aerial, terrestrial and portable assets (host and participating MS, Frontex owned, co-owned, and leased) deployed during the operational activity<br>• Ratio of Frontex's own Technical Equipment (TE) included in the pool of TE<br>• Extent of unfulfilled Frontex technical equipment requests<br>• Share of TE Pool spent on very large assets<br>• Timeliness of the deployment of TE<br>• Ratio of Standing Corps officers equipped with the state of the art equipment | • Frontex Evaluation Reports of Joint Operations<br>• Single Programming Document<br>• Frontex Consolidated Annual Activity Reports<br>• Minimum Number of Items of TE (MNITE)<br>• Grants awarded | Yearly |

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| | • Ratio of available versus filled positions assigned to logistics<br>• Percentage of deployment periods per operational year where there is a gap between confirmed commitments and uncovered needs | | |
| Training /<br>**Policy Option 3** | • Number of new harmonised training programmes developed<br>• Numbers of new or revised handbooks, training sessions delivered, trained trainers and trainees<br>• Operational Training Programme implemented<br>• Number of training programmes for SC Categories 1, 2 and 5 delivered<br>• Number of training programmes delivered to FRMs<br>• Number of training activities organised within the EBCG Academy and in cooperation with the partnership academies network<br>• Number of training sessions delivered to mid and senior-level staff for command roles<br>• Number of training activities specifically focused on enhancing interoperability in command and coordination | • Frontex Consolidated Annual Activity Reports<br>• Single Programming Document<br>• Internal evaluations carried out covering trainings | Yearly |
| EIBM /<br>**Policy Option 2** | • Forecast picture for the first (situation in non-EU countries) and second (measures with neighbouring countries) tier of the EIBM access control model is available for two of the main migratory routes towards the EU.<br>• Reports to MB with recommendations on next steps as regards TOEIBM<br>• Adopting MB Decision establishing updated TOEIBM<br>• EIBM practical implementation guide issued | • Frontex Consolidated Annual Activity Reports<br>• Single Programming Document<br>• National EIBM strategies<br>• Frontex reports on results of Research and Innovation activities | Every 2 years |

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| | • Programme of work for the EIBM Working Group implemented<br>• Strategic guidance annex uptake by Member States' submissions<br>• Timeliness of Member States' submissions set out in the strategic planning calendar adopted by the MB<br>• Comparability of Member States' submissions<br>• Timely delivery of assessments of MS/SAC according to the Common Vulnerability Assessment Methodology<br>• Delivery of vulnerability assessment knowledge products portfolio<br>• Timely production and provision of bi-annual vulnerability assessment reports to EU institutions by the Capacity and Readiness Unit | | |

# ANNEX 14: COMPETITIVENESS CHECK

## 1. Overview of impacts on competitiveness

| Dimensions of competitiveness | Impact of the initiative (++ / + / 0 / - / -- / n.a.) | References to sub-sections of the main report or annexes |
|---|---|---|
| Cost and price competitiveness | n.a. | Main report – sections on economic impacts / stakeholders affected (initiative targets public authorities) |
| International competitiveness | n.a. | Main report – sections on economic impacts / stakeholders affected |
| Capacity to innovate | n.a. | Main report – sections on economic impacts / stakeholders affected |
| SME competitiveness | n.a. | Main report – 'Application of the 'one in, one out' approach' (no admin costs for private sector) |

## 2. SYNTHETIC ASSESSMENT

Overall, this initiative aims to address challenges related to the efficiency of the EBCG and the adequate implementation and further development of EIBM. The measures under consideration primarily concern the organisation, planning, governance, operational cooperation and internal capacities of public authorities (Frontex and Member States' competent authorities). They do not introduce regulatory obligations for economic operators, set product requirements or alter market access conditions or the rules governing competition in the internal market.

Accordingly, no direct impacts on competitiveness are expected across the four dimensions (cost/price competitiveness, international competitiveness, capacity to innovate and SME competitiveness). For the purposes of the competitiveness check, the initiative is therefore assessed as not applicable.

While the implementation of some measures may entail public procurement by Frontex and/or Member States (e.g. for technical equipment and related services, including IT components, integration, maintenance, training and other support services), this reflects how public authorities may operationalise the measures, rather than an impact stemming from new requirements on undertakings. Such procurement would be conducted under the applicable EU and national public procurement rules and would not, in itself, constitute a competitiveness effect attributable to the initiative (no new compliance burden or market constraint is created for operators, including SMEs).

Stakeholder input from economic operators received during the Call for Evidence does not alter this conclusion, as the initiative remains focused on public-sector operational capacity and governance under the EBCG framework rather than on regulating private-sector activity.

# ANNEX 15: SME TEST

This initiative primarily concerns the organisation, planning and operational capacities of public authorities (Frontex and Member States' competent authorities) under the EBCG framework. It does not introduce obligations for economic operators, create new compliance requirements or regulate market behaviour.

Accordingly, the initiative is not expected to have specific or disproportionate impacts on SMEs, and an SME test is assessed as not applicable. Any costs associated with implementation would mainly relate to public authorities (including possible public procurement of equipment or related services), and do not constitute SME impacts attributable to the initiative.

The public consultation did not include a dedicated SME section, and no SME-specific impacts were identified.