



Mr Robert France
European Commission
DG for Migration and Home Affairs
Directorate F, Unit F4

Your: 09.04.2026 No Ares(2026)3697668

Our: 24.04.2026 No 14-13.4/203-2

Observations on the ISF Estonia annual performance report

Dear Mr France,

Thank you for the observations provided on the ISF Estonian annual performance report covering the period from 1 July 2024 to 30 June 2025. We remain committed to adhering the guidance note on best practices for the annual performance report when preparing our reports. At the same time, we would like to draw you attention to the following points:

- 1) You note that five Specific Actions were assigned incorrect project references in this year's report (sections 1.1, 1.5 and 7) and that these references should have started with "ISF/2024/SA". Please note that Estonia has only three ISF Specific Actions projects, all of which were approved in 2022 and therefore start with "ISF/2022/SA". No references to these project numbers were included in sections 1.1 and 7 of the annual performance report, and the references to Specific Actions projects in section 1.5 are correct. For these reasons, this observation remains unclear.
- 2) Section 2.3 of the *Note on Best Practices for the Annual Performance Reports on AMIF, BMVI and ISF for 2021-2027 programming period* specifies that only Specific Actions implemented during the reporting period should be reflected in annual performance report. Please note that the Specific Action project ISF/2022/SA/2.2.1/012 EMPACT was finalised in 2023. This was clearly indicated in sections 1.5 and 1.7 of the ISF Estonian annual performance report covering the period from 1 July 2023 to 30 June 2024, which also presented the project's results. Consequently, it would not be relevant to mention the project ISF/2022/SA/2.2.1/012 EMPACT in sections 1.5 and 7 of the current report, nor in the next annual performance report.
- 3) With regard to the observation concerning activities implemented in relation to third countries, please note that for all activities mentioned in section 6 of the annual performance report, the Commission was consulted prior to their approval. For this purpose, the format foreseen by the Commission was duly completed, clearly setting out the rationale for implementing the activities in relation to non-EU countries. In all cases, the Commission issued a positive opinion following these consultations.

References to the relevant Commission communication have also been included in section 6 of the report.

In light of the above, we believe it is not necessary to repeat the same information in the annual performance reports. We would also like to draw attention to the fact that section 6 of the previous Estonian ISF annual performance report covering the period from 1 July 2023 to 30 June 2024, which followed the same structure as the report under consideration, was presented by the Commission as a good practice example to other Member States during the 9th Home Affairs Funds Committee on 24 October 2024.

Furthermore, the above-mentioned guidance note on best practices does not require the duplication of information explaining why activities are implemented in relation to third countries in the annual performance report.

We remain at your disposal should any further clarification be required.

Yours sincerely,

/digitally signed/

Tarmo Miilits
Secretary General