



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

Directorate E – Borders, Migration and Security in Member States I
The Director (acting)

Brussels
HOME.E.1/MGM

NOTE FOR THE ATTENTION OF THE MEMBERS OF THE COMMITTEE FOR THE HOME AFFAIRS FUNDS

Ref.: HOME-Funds/2026/20

Subject: Invitation to submit an application for the specific action “Support to Member States to enhance their biometric capabilities in relation to the Schengen Information System (SIS)” under the Instrument for Financial Support for Border Management and Visa Policy (BMVI) – Reference: BMVI/2026/SA/1.5.2.

1. INTRODUCTION

Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy (BMVI) provides that Member States may receive funding for specific actions in addition to their initial allocations in their respective programmes.

Specific actions aim to fund transnational or national projects that bring Union added value, in accordance with the objectives of the BMVI, for which one, several or all Member States may receive an additional allocation to their programmes.

They will be implemented as one of the components of the Thematic Facility in line with Article 8 of the above-mentioned Regulation and in accordance with the relevant financing decisions and work programmes for the Instrument ⁽¹⁾.

By the present note, the Member States participating in the BMVI ⁽²⁾ are invited to submit an application under the specific action “Support to Member States to enhance their biometric capabilities in relation to the Schengen Information System (SIS)”, in line with the actions listed in the above-mentioned Commission’s financing decision and work programme.

(1) [Integrated Border Management Fund – Border Management and Visa Instrument \(2021-27\)](https://eur-lex.europa.eu/eli/reg/2021/1148/oj) (europa.eu).

(2) Reference to Member States in this note should be understood as including the **Schengen associated countries (Iceland, Liechtenstein, Norway and Switzerland)**, for which the arrangements for their participation in the BMVI are in place.

2. GENERAL PRINCIPLES

Specific actions are implemented by one or more Member States participating in the Instrument via funding received in addition to the allocation under their BMVI programmes.

Funding for specific actions is added to the Member States' programme allocations by means of a programme amendment. That additional funding is earmarked for the specific action concerned and shall not be used for other actions in the Member State's programme, except in duly justified circumstances and as approved by the Commission through the amendment of the programme.

Whereas the regular EU co-financing rate under the Member States' programmes will not exceed 75% of total eligible expenditure, projects implemented under specific actions may benefit from an increased co-financing rate of up to 90% of total eligible expenditure.

Specific actions must be implemented by the Member States in accordance with the BMVI⁽³⁾ Regulation and the Common Provisions Regulation (EU) 2021/1060 (CPR)⁽⁴⁾. This includes compliance with fundamental rights. Moreover, Member States must ensure that the specific action is not affected by a reasoned opinion delivered by the Commission in respect of infringement proceedings under Article 258 of the Treaty on the Functioning of the European Union that put in doubt the legality and regularity of expenditure or the performance of the actions (Article 8(5) of the BMVI Regulation).

Your attention is drawn, in particular, to the following provision of the CPR. As regard the value added tax ("VAT") eligibility regime, Article 64 (1)(c) of the CPR provides that VAT is not eligible, except:

- (i) "for operations the total cost of which is below EUR 5 000 000 (including VAT);
- (ii) for operations the total cost of which is at least EUR 5 000 000 (including VAT) where it is non-recoverable under national VAT legislation".

3. SPECIFIC ACTION "SUPPORT TO MEMBER STATES TO ENHANCE THEIR BIOMETRIC CAPABILITIES IN RELATION TO THE SCHENGEN INFORMATION SYSTEM (SIS)"

3.1. Indicative Budget available

The indicative amount envisaged for this specific action is **EUR 15 million**.

The maximum amount to be allocated to each Member State is indicated in Annex 1.

⁽³⁾ Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy.

⁽⁴⁾ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

3.2. Background for the specific action

Effectively addressing security challenges at the external borders of the EU relies on the identification of individuals who pose a threat or that are subject to an entry ban or return decision. Individuals sought by the authorities often conceal their identities or adopt multiple aliases. In this context, the ProtectEU strategy⁽⁵⁾ underlined the need to improve the integration and application of advanced biometric technologies across Member States, reinforcing efforts to combat the use of fraudulent documents, as well as to support the identification of foreign terrorist fighters returning or entering at the EU's external borders. This includes supporting Member States in the adoption of robust mechanisms for identity verification and identification, such as those based on facial recognition and fingerprinting.

At external borders, checks entail the verification of a person's identity (or establishing the identity of a person) and checking whether a person is subject to an alert in the Schengen Information System (SIS).⁽⁶⁾ When searching the SIS, competent authorities may use fingerprints (dactyloscopic data) to identify a person. However, where the identity of a person cannot be established by other means, the fingerprints must be used and a search in the SIS Automatic Fingerprint Identification System (AFIS) must be conducted.⁽⁷⁾

With the (progressive) entry into operations of the Entry Exit System (EES) in October 2025 at the external borders by 29 states implementing the system, third-country nationals travelling for a short stay are required to have their biometric data (i.e. fingerprints and facial images) recorded at external border crossing points. During the progressive entry into operations of the EES, the cross-checks of the SIS carried out by competent authorities when registering in the EES third-country nationals at external borders resulted in identifying individuals subject to SIS alerts who might otherwise have gone undetected. Thus, the search of the SIS AFIS with fingerprints captured during EES processes supports Member States' competent authorities in their implementation of the EES and effective border management at EU external borders. Since 10 April 2026, the EES is fully operational.

The SIS anticipates the use of face recognition technologies to be used for the identification of persons in the context of regular border crossings. This functionality will be implemented as of 2028 with the implementation of the shared Biometric Matching System (sBMS) searches for the SIS.⁽⁸⁾

This specific action aims to support Member States for two activities ("sub-actions"):

1. to adapt their national SIS AFIS implementation to enable searches in the SIS using fingerprints captured in the EES. With the EES fully operational, Member States are

⁽⁵⁾ European Commission, COM(2025) 148 final, 1.04.2025.

⁽⁶⁾ Articles 6 and 8 of Regulation (EU) 2016/399 of 9 March 2016.

⁽⁷⁾ Article 33(2) Regulation (EU) 2018/1861 and Article 43(2) Regulation (EU) 2018/1862. The SIS AFIS, enabling competent authorities to search the SIS using fingerprints, became operational in 2018 and is compulsory since 2020.

⁽⁸⁾ The shared biometric matching service (sBMS) is a component of the Interoperability Regulations (Regulation (EU) 2019/817 and Regulation (EU) 2019/818) that entered into operations in May 2026.

encouraged to systematically record and check the biometrics of third-country nationals travelling for short stay against the SIS AFIS. This will ensure that persons subject to a SIS alert and who pose a security threat can be identified and refused entry to the Schengen area.

2. to adapt, where necessary, the EES face-capturing devices to direct the queries to the SIS.

The legal bases related to this specific action are the following:

- Regulation (EU) 2018/1860 of the European Parliament and of the Council of 28 November 2018 on the use of the Schengen Information System for the return of illegally staying third-country nationals ⁽⁹⁾;
- Regulation (EU) 2018/1861 of the European Parliament and of the Council of 28 November 2018 on the establishment, operation and use of the Schengen Information System (SIS) in the field of border checks, and amending the Convention implementing the Schengen Agreement, and amending and repealing Regulation (EC) No 1987/2006 ⁽¹⁰⁾;
- Regulation (EU) 2018/1862 of the European Parliament and of the Council of 28 November 2018 on the establishment, operation and use of the Schengen Information System (SIS) in the field of police cooperation and judicial cooperation in criminal matters, amending and repealing Council Decision 2007/533/JHA, and repealing Regulation (EC) No 1986/2006 of the European Parliament and of the Council and Commission Decision 2010/261/EU ⁽¹¹⁾;
- Regulation (EU) 2017/2226 of the European Parliament and of the Council of 30 November 2017 establishing an Entry/Exit System (EES) to register entry and exit data and refusal of entry data of third-country nationals crossing the external borders of the Member States and determining the conditions for access to the EES for law enforcement purposes, and amending the Convention implementing the Schengen Agreement and Regulations (EC) No 767/2008 and (EU) No 1077/2011 ⁽¹²⁾.

3.3. Scope and purpose of the specific action

The specific action aims to fund national projects that will enhance the use of biometrics necessary to leverage the full potential of the SIS and the newly implemented systems at the external borders and interoperability components (the EES and sBMS functionalities).

It will support Member States in the purchase and development of software and equipment for the purposes of performing searches with facial images in the SIS,

⁽⁹⁾ OJ L 312, 7.12.2018, ELI: <http://data.europa.eu/eli/reg/2018/1860/oj>.

⁽¹⁰⁾ OJ L 312, 7.12.2018, ELI: <http://data.europa.eu/eli/reg/2018/1861/oj>.

⁽¹¹⁾ OJ L 312, 7.12.2018, ELI: <http://data.europa.eu/eli/reg/2018/1862/oj>.

⁽¹²⁾ OJ L 327, 9.12.2017, ELI: <http://data.europa.eu/eli/reg/2017/2226/oj>.

including adaptation of the EES equipment and IT solutions (sub-action 1); and the development and adaptation of technical solutions that allow fingerprints captured for the EES to be used for searching the SIS (sub-action 2).

The specific action targets in particular:

- the purchase and adaptation of equipment for the capturing of facial images (e.g. cameras or similar equipment), including adaptations of existing EES face-capture devices to direct face-search queries to the SIS;
- the development and adaptations to national technical solutions and software to enable fingerprints and facial images collected for the EES to be used to search the SIS, including adaptations to national SIS-AFIS implementation and requirements for interfaces and workflows;
- the purchase of hardware (e.g. face-capture devices), software development and integration, and licences to be deployed at the border crossing points, adaptations to national IT solutions, including software, performing proof(s) of concept(s), and redefinition of workflows and processes at the borders.

It will not cover personnel costs.

3.4. Expected results

- IT functionality upgraded as regards the use of the SIS, in particular the searches in the SIS with fingerprints and facial images.
- additional equipment for border crossing points where necessary (cameras for the capturing of face images);

4. PROCEDURE FOR APPLICATION

4.1. Admissibility and assessment aspects

All Member States participating in the BMVI may submit an application.

As regards the Schengen Associated Countries:

- Iceland, Norway and Switzerland may apply and will receive additional funding as the legal arrangements for their participation in the BMVI are in place.
- Liechtenstein may indicate its interest in participating in this specific action but is not required to submit an application because its participation will be ensured through a grant agreement ⁽¹³⁾.

The Commission services will assess the applications submitted by the Member States.

⁽¹³⁾ Selected specific actions are to be implemented under direct management according to Article 3, scope of participation, of the Agreement between the European Union and the Principality of Liechtenstein on supplementary rules in relation to the Instrument for Financial Support for Border Management and Visa Policy, as part of the Integrated Border Management Fund, for the period 2021 to 2027 (http://data.europa.eu/eli/agree_internation/2024/200/oj).

To be considered admissible an application must

1. be submitted within the deadline (see below) to the BMVI specific actions functional mailbox HOME-BMVI-SPECIFIC-ACTIONS@ec.europa.eu
2. consist of the official BMVI/2026/SA/1.5.2 Application Form attached to this note together with the Annex on the Budget form and be readable and complete (all fields necessary for the assessment are filled in)
3. be submitted by the Managing Authority on behalf of the entity in the Member State that will be responsible for the implementation of the specific action
4. identify a project beneficiary (= an entity) that will be responsible for the implementation of the specific action in the Member State.

The simplified application form for this specific action requires each applicant to:

1. confirm that it intends to participate in the specific action and will use the allocated amount for the specific action's intended purpose, and
2. describe the scope and the nature of the activities that it will implement under the specific action (relating to either one or both sub-actions)
3. outline how they will complement Union funding already made available on projects related to SIS and EES (in particular under the BMVI programme, including other specific actions).

The Commission services will allocate an amount to each admissible application that is assessed as falling within the purpose and the scope of the specific action. The maximum amount allocated per Member State is indicated in Annex 1. Member States may request less.

4.2. Application procedure

Deadline for the application: Member States are invited to submit their application by **29 May 2026 at the latest**, using the official BMVI/2026/SA/1.5.2 Application Form attached to this note. Applications can be submitted in any official EU language (the abstract/summary should however always be in English). For reasons of efficiency, it is strongly advised to use English for the entire application.

To ensure equal and fair treatment of the applications and allow the Commission to allocate at the same date all the available funding all applications will be assessed simultaneously. Therefore, **applications submitted after the deadline will not be admissible.**

The Members of the Committee for the Home Affairs Funds will be informed at the latest 10 working days before the deadline for the submission of applications if the deadline for the submission is extended.

E-mail address for the application: Applications must be submitted to the BMVI specific actions functional mailbox: HOME-BMVI-SPECIFIC-ACTIONS@ec.europa.eu. Member States may submit additional documentation if necessary.

If there is a need to clarify certain aspects or to correct clerical mistakes in the application, the Commission services may contact the applicant during the evaluation process. A reply should be provided within 3 working days from the request date.

Any requests for clarification of the Member States on this call may be sent **by 15 May 2026 at the latest**, to the BMVI specific actions functional mailbox: HOME-BMVI-SPECIFIC-ACTIONS@ec.europa.eu.

Requests for clarifications should be sent **ONLY by the Managing authority**. The Managing Authority has an important role to explain to the potential beneficiaries the applicable rules and specificities of the programmes in general and of a specific action in particular and to help prepare applications for a specific action. The Managing Authority should be the contact point and take the responsibility to review questions from potential beneficiaries and raise questions to or request clarifications from the Commission services where necessary. As projects under specific actions are managed at national level, according to national rules, specific questions on eligibility of costs should be addressed first to the Managing Authority.

To respect the equal treatment and transparency, the replies to the written requests for clarification received will be sent to all Member States, via HOME-AFFAIRS-FUNDS-COMMITTEE@ec.europa.eu.

Member States will be informed of the outcome of the assessment of the applications by September 2026.

5. AMENDMENT OF THE BMVI PROGRAMMES AND ELIGIBILITY OF EXPENDITURE

After having been informed that their application has been selected under this specific action, Member States shall submit to the Commission a request to amend their BMVI programme via SFC ⁽¹⁴⁾. The amended programme should include a short description of the specific action, adjust the output and result indicators, and include the costs and codes linked to this specific action (respectively in the description and under tables 1, 2 and 3 of the relevant specific objective, and table 6 of the programme).

When amending a BMVI programme, two situations may arise regarding the eligibility of expenditure ⁽¹⁵⁾:

1. For Member States that have included all the types of interventions listed in Annex VI, table 1 of the BMVI Regulation that are relevant for this specific action in table 2.1.3 of the relevant specific objective in their *initially approved* BMVI programme: expenditure for the specific action will be eligible as of 1 January 2025, in line with the revised interoperability roadmap focusing on 2025 and 2026 endorsed by the Justice and Home Affairs Council. ⁽¹⁶⁾

⁽¹⁴⁾ This does not apply to Liechtenstein as specific actions are implemented under direct management through a grant agreement.

⁽¹⁵⁾ Article 63(7) of Regulation (EU) 2021/1060.

⁽¹⁶⁾ <https://data.consilium.europa.eu/doc/document/ST-6428-2025-INIT/en/pdf>.

2. For Member States that have *not* included all the types of interventions listed in Annex VI, table 1, of the BMVI Regulation that are relevant for this specific action in table 2.1.3 of the relevant specific objective in their *initially approved* BMVI programme: expenditure for the specific action will be eligible from the date of submission by the Member State of its request for amendment of the BMVI programme that will add the respective types of interventions in the programme.

Yours faithfully,

Silvia MICHELINI

Enclosures: 1) Maximum amount allocated per Member State
 2) Application form
 3) Budget form

c.c.: JHA Counsellors

Annex 1: Maximum amount allocated per Member State

The indicative budget under this specific action will be allocated at **equal shares** to the Member States, because the enhancement of the functionalities of the SIS is expected to require the same efforts throughout the Member States, regardless of the size or number of border crossings.

The maximum amount allocated per Member State (= total Union contribution to be earmarked to the Member State programme, including technical assistance) is EUR 500 000.00. Member States may request less.

