



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

Directorate F – Borders, Migration and Security in Member States II  
F.4 – Finland, Sweden, Denmark, Poland, Czechia, Slovakia, Lithuania, Estonia, Latvia

Brussels  
HOME.F.4/MRG

**Subject: Observations on the ISF Estonia annual performance report  
CCI: 2021EE65ISPR001**

Dear Mr Miilits,

According to Article 30(1) of Regulation (EU) 2021/1149, the Commission received on 12 February 2026 the annual performance report for the Member State programme of Estonia under ISF for the accounting year covering the period 1 July 2024 – 30 June 2025.

Following the assessment of the report, we would like to make some observations on its content. Please find our main observations in the annex to this letter in accordance with Article 30(3) of Regulation (EU) 2021/1149.

No formal resubmission is requested.

Yours sincerely,

Robert FRANCE  
p.o. Lope GALLEGO

Enclosure: Annex – Observation for the preparation of the next ISF annual performance report (APR)

c.c.: Tairi Pallas, Ministry of the Interior  
Leht Ülle, Ministry of the Interior

Mr Tarmo Miilits  
Secretary General  
Ministry of the Interior  
Pikk 61, Tallinn 15065  
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## **Annex: Observations for the preparation of the next ISF annual performance report (APR)**

When preparing the next APR please consult the note on Best Practices for the annual performance reports of the AMIF, BMVI and ISF for the 2021-2027 Programming Period (Ref. HOME-Funds/2026/02 of 14 January 2026) that can offer guidance on how to continuously improve the reports for the next reporting period.

The Commission welcomes Estonia's interest in innovation and in using ISF to pilot and validate promising technologies coming out from research. We would like to inform you about further opportunities for uptake and networking on security research through the Community for European Research and Innovation for Security (CERIS): [https://home-affairs.ec.europa.eu/networks/ceris-community-european-research-and-innovation-security\\_en](https://home-affairs.ec.europa.eu/networks/ceris-community-european-research-and-innovation-security_en). In addition, the Commission promotes the use of innovation procurement, innovative procurement and joint procurement schemes to invest in modern European solutions for internal security. More information can be found on the iProcureNet toolbox: <https://www.iprocurenet.eu/home/toolbox-2/>. We remain available for more information on these opportunities.

In addition, we have noticed that five Specific Actions were given the wrong project reference in this year's report (sections 1.1, 1.5 and 7), as they should have started with "ISF/2024/SA". We request you review the project references for Specific Actions in future reports.

### **Section 1.5 Specific Actions**

The Managing Authority (MA) should include Specific Action project ISF/2022/SA/2.2.1/012 EMPACT under this section, including a mention on its finalisation in 2025 if it has reached the end of its implementation period.

### **Section 3 Implementation of the Union acquis**

The MA is advised not to include the reference to Chapter 31 under this section since Chapter 31 TFEU does not constitute a legal basis for the ISF Regulation and therefore outside of the scope of ISF.

### **Section 5.1 Enabling conditions**

The Commission has noted the current arrangements in place and the lack of complaints lodged so far.

In addition to what has been already included in the current APR and in line with the note on the best practices mentioned above you are encouraged to add information on the experience in ensuring the fulfilment of the HECs during the reporting period, such as experience from verifying compliance during the selection of projects or the findings of on-the-spot checks.

### **Section 6 Projects in or in relation to a third country**

The Commission has noted that several training projects are taking place with non-EU countries. In future reports, it would be advisable to explain to what extent the expertise required for the training is not available within the EU. It is important to avoid undermining the European strategic autonomy. This point will be followed up bilaterally with the MA.

### **Section 7 Summary**

As recommended under section 1.5, the MA should mention the closure of Specific Action project ISF/2022/SA/2.2.1/012 EMPACT under this section if it has reached the end of its implementation period.

The MA is invited to delete the reference to the Common Foreign and Security Policy since it can blur the line between internal security policy and foreign policy/external security, which falls outside the scope of ISF.