



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

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HOME-Funds/2025/14

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

**Subject: Invitation to submit an application for the Specific Action “Support to Member States for European Police Record Index System - EPRIS” under the Internal Security Fund (ISF) –
Reference: ISF/2025/SA/1.1.1**

1. INTRODUCTION

Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund ⁽¹⁾ provides that Member States may receive funding for specific actions in addition to their initial allocation 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 Fund 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 for the work programme 2023-2025 for the ISF Thematic Facility ².

By the present note, the Commission **invites those Member States participating in the ISF which have officially committed themselves with a recent notification to Europol that they will implement EPRIS** to submit an application for the Specific Action “Support to Member States for EPRIS”, in line with the actions listed in the above-mentioned Commission financing decisions.

Specific actions will be implemented by Member States participating in the Internal Security Fund via funding received in addition to the allocation under their ISF programmes.

⁽¹⁾ Regulation (EU) 2021/1149

⁽²⁾ Internal Security Fund (2021-2027) - European Commission

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 the total eligible expenditure, projects implemented under specific actions may benefit from an increased co-financing rate of up to 90% of total eligible expenditure.

The specific action must be implemented by the Member States in accordance with the ISF Regulation ⁽³⁾ and the Common Provisions Regulation (EU) 2021/1060 (CPR) ⁽⁴⁾. This includes compliance with fundamental rights.

Your attention is in particular drawn to one provision of the CPR. As regards the valued 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".

2. INVITATION TO SUBMIT AN APPLICATION

2.1. Background for the specific action

The Prüm framework is a cornerstone of EU police cooperation as one of the main elements of the EU toolbox to enhance security in a Schengen area without internal borders. On 13 March 2024, the European Parliament and the Council adopted the new Regulation on the automated search and exchange of data for police cooperation (the Prüm II Regulation) ⁽⁵⁾. The Prüm II Regulation entered into force on 25 April 2024 and seeks to revise the existing Prüm framework, with a view to closing information gaps and boosting the prevention, detection and investigation of criminal offences in the EU, hence fostering internal security for everyone in Europe.

The Prüm II framework provides for automated exchanges of two new data categories (facial images and police records), besides two new technical components (central router and EPRIS) to be developed respectively by eu-LISA and Europol.

⁽³⁾ Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund.

⁽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.

⁽⁵⁾ Regulation (EU) 2024/982 of the European Parliament and of the Council of 13 March 2024 on the automated search and exchange of data for police cooperation, and amending Council Decisions 2008/615/JHA and 2008/616/JHA and Regulations (EU) 2018/1726, (EU) No 2019/817 and (EU) 2019/818 of the European Parliament and of the Council (the Prüm II Regulation).

While the automated exchanges of biometric data and vehicle registration data are mandatory for Member States, **the automated exchanges of police records via EPRIS are optional** (and reciprocal). Member States will implement EPRIS only on a voluntary basis by 31 December 2027.

EPRIS is an IT system based on a decentralised architecture. Since the adoption of the Prüm II Regulation, Europol has become the central service provider responsible for the implementation and the operation of the EPRIS central infrastructure and the secure communication channel. On their side, participating Member States will need to implement, by 31 December 2027, a decentralised infrastructure, including a national police record index, and micro services (query tool, search tool and other services) enabling the simultaneous querying of national police record indexes.

EPRIS has been developed since 2017 in the framework of ISF-Police via a Union Action grant financing three pilot projects under ISF-Police (2014-2020) and ISF (2021-2027) ⁽⁶⁾ by a core group of committed Member States (DE, ES, FI, FR, IE, LU and PL with BE, DK, HU and NL as observers). These pilots fostered a strong community of experts committed to the implementation and use of EPRIS, and a mature technical solution ready to be taken over by Europol and to be rolled out to all Member States.

To bridge the gap between the pilot project and the implementation of EPRIS under the Prüm II Regulation, the financial support through a ‘Specific Action’ aims to support those Member States who will make full use of the optional exchange of police records. The funding is limited to those Member States which have officially committed themselves to do so, via a recent notification procedure to Europol.

Funding provided through the “Specific Action EPRIS” is complementary with actions that Member States could finance under their ISF programmes in accordance with the ISF basic act, aimed at national activities needed to implement the new obligations in accordance with the Prüm II Regulation.

2.2. Indicative budget available

The indicative amount envisaged for this “Specific Action EPRIS” (ISF/2025/SA/1.1.1) is **EUR 7 020 000 million**.

This amount is subject to an amendment to the ISF Thematic Facility financing decision mentioned in section 1 above ⁽⁷⁾.

The maximum amount to be allocated to each Member State concerned is indicated in the Annex to this note.

As all national implementation of EPRIS will be given equal treatment, the requested amount (i.e. Union contribution to the Member State’s ISF programme for the “Specific Action EPRIS”) should not be higher than **EUR 620 000** (including Technical Assistance 6%) per application. However, Germany’s amount is higher because it will cover with its

⁽⁶⁾ ISF-2021-TF1-AG-EPRIS-IBA; ISFP-2018-AG-IBA-EPRIS; ISFP-2016-AG-IBA-EPRIS

⁽⁷⁾ The amendment aims to ensure sufficient funding for shared management in the work programme. The indicative budget of this invitation will have to be revised downwards if the amendment is not adopted as planned.

increased share (i.e. **EUR 820 000**) the costs of the ADEP software development by the service provider (Fraunhofer OKUS).

2.3. Scope and purpose of the specific action

The objective of this specific action is to support the Member States concerned in implementing at national level activities that go beyond the mandatory introduction of new data categories under the Prüm II Regulation and focus on police records.

In the context of the implementation of Prüm II, Member States are likely to focus their available financial resources under their ISF programmes on the implementation of facial images, one of the two new mandatory data categories under the Prüm II Regulation. After all, for some Member States, this will require the creation of a criminal database of facial images. The implementation of police records via EPRIS may not be prioritised by Member States. The specific action aims to counter this possibility with additional financial support to those Member States who expressed a clear intention to develop the option of full automated exchange of police records through EPRIS.

The specific action proposed **can include** the following activities:

- Setting up, adapting and maintaining EU and decentralised information systems including software that contribute to the implementation and operations of EPRIS; namely but not exclusively:
 - o Update and customisation of national police records source database(s);
 - o Establishment and management of a national police record index, including the automated synching with the national police records source database(s);
 - o Set up, configuration and operations of EPRIS micro-services provided by Europol, in the national technical infrastructure;
 - o Connection and maintenance of the national police record index to the EPRIS central routing infrastructure.
- Training on the use of such systems;
- and testing and improving the interoperability components and data quality of such systems;
- Hardware (**NB:** within the limit of the 35% threshold for equipment, means of transport and security-relevant facilities as stipulated in Article 13(7) of ISF Regulation);
- Cost of staff involved in the activities that are supported by the Fund or activities requiring involvement of staff for technical or security-related reasons.
- Consultancy services in relation to EPRIS implementation.

Please note that besides the ineligible activities listed in Article 5(5) of the ISF Regulation, the specific action should not finance activities related to:

- Meetings, conferences, workshops and events.

- Activities with and in third countries.

Given the additional nature of activities under the specific action compared to the obligations under the Prüm II Regulation, Member States are invited to indicate in the application form how their proposal for the “Specific Action EPRIS” is complementary with the actions envisaged under their ISF programme and other EU funding instruments.

Member States should also indicate in their application form under which output and result indicators (see Annex 4) their project will fall.

2.4. Expected results

As part of the implementation of EPRIS by Member States, the expected results would be:

- The establishment and the management of a national police record index synched with the national police records database(s) and connected to the EPRIS central routing infrastructure.
- The implementation and operations of EPRIS micro-services provided by Europol in the national technical infrastructure.
- The readiness to use EPRIS for automated exchanges of police records.

The specific action proposed should not start before 1 November 2024 and should ideally be completed by 31 December 2027 at the latest.

2.5. Target audience for the specific action

Only the Member States which have officially committed themselves to implement EPRIS via their notification to Europol can apply. The Member States concerned are listed in the Annex to this call.

3. PROCEDURE FOR APPLICATION

3.1. Admissibility and assessment aspects

To be considered admissible a proposal must:

1. be submitted by a Member State identified in the Annex to this call and consist of only one proposal per Member State,
2. be submitted within the deadline (see below) to the ISF specific actions functional mailbox HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu,
3. consist of the official ISF/2025/SA/1.1.1 Application form attached to this Note, together with the Budget form, which must be readable and complete (all fields necessary for assessment are filled in),
4. attach the Member State’s official commitment letter to Europol,
5. 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,

6. identify a project beneficiary (an entity) that will be responsible for the implementation of the specific action in the Member State.

As regards the assessment phase, DG HOME will allocate an amount to each admissible application the activities of which are assessed as falling within the purpose and the scope of this specific action. The maximum amount allocated per Member State is indicated in Annex 1. Member States may request less.

In the simplified application form for this specific action, a Member State should confirm its intention to participate in the specific action, indicate the scope and the nature of the activities that it aims to implement under the specific action, confirm that it will use the allocated amount solely for the specific action's intended purpose and describe how the activities will complement other funding available under their ISF programme 2021-2027.

Member States are encouraged to explain the financial envelope proposed and ensure coherence between the amounts for the activities and the needs identified at national level.

Member States must ensure respect for the horizontal principles described in Article 9 of Regulation (EU) 2021/1060, including respect for fundamental rights and compliance with the Charter of Fundamental Rights of the European Union, as well as Regulation (EU) 2016/679 and Directive (EU) 2016/680 (8).

Moreover, Member States must also ensure that the envisaged actions are 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 (TFEU) that put in doubt the legality and regularity of expenditure or the performance of the actions (Article 8(5) of Regulation (EU) 2021/1149).

3.2. Application procedure

Deadline for the application: Member States are invited to submit their proposals by **27 June 2025** at the latest, using the official ISF/2022/SA/1.1.1 Application form attached to this Note and its budget form. Proposals can be submitted in any official EU language (project summary should however always be in English). For reasons of efficiency, it is strongly advised to use English for the entire proposal.

In line with the Regulation (EC) No 1049/2001 (9), any document held by the Commission, including documents containing sensitive information, may be subject to a request for public access.

(8) Directive (EU) 2016/680 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA. Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data.

(9) Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents

To ensure equal and fair treatment of the proposals and allow the Commission to allocate at the same date all the available funding, DG HOME will assess all proposals simultaneously. Therefore, proposals 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 the proposals in case the deadline for the submission of proposals is extended.

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

No modification to the application is allowed once the deadline for submission has elapsed. However, if there is a need to clarify certain aspects or to correct clerical mistakes, the Commission may contact the applicant/ lead Member State during the evaluation process. A reply should be provided by the Member State within 3 working days from the request date.

Any requests for clarification by the Member States on this invitation to submit an application may be sent by **6 June 2025** at the latest, to the ISF specific actions functional mailbox HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu.

Requests for clarifications should be sent **ONLY by the Managing Authority**. The Managing Authority has an important role to play in explaining to potential beneficiaries the applicable rules and specificities of the ISF programme and the Specific Actions scheme, as well as helping them to prepare their applications. The Managing Authority should be their sole contact point and has the responsibility to review and reply to any questions received from applicants. It may, however, address these questions to the Commission services if further clarification is needed. 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.

DG HOME will inform Member States of the outcome of this invitation to submit an application towards July 2025.

4. AMENDMENT OF THE ISF PROGRAMMES AND ELIGIBILITY OF EXPENDITURE

After having been informed of the outcome of this invitation to submit an application, each Member State should submit to the Commission a request to amend its ISF programme, via SFC. 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 Specific Objective 1, and table 6 of the programme). When amending an ISF

programme of a Member State, two situations may arise regarding the eligibility of expenditure (10):

7. For Member States that have included all the types of interventions listed in Annex VI table 2 of the ISF regulation that are relevant to the “Specific Action EPRIS” ISF/2025/SA/1.1.1 in table 2.1.3 of Specific Objective 1 in their *initially approved* ISF programme: expenditure for the “Specific Action EPRIS” will be eligible as of 1/11/2024.
8. For Member States that have *not* included all the types of interventions listed in Annex VI table 2 of the ISF regulation that are relevant to the “Specific Action EPRIS” ISF/2025/SA/1.1.1 in table 2.1.3 of Specific Objective 1 in their *initially approved* ISF programme: expenditure for the “Specific Action EPRIS” will be eligible from the date of the submission by the Member State of its request for the amendment of the ISF programme that will add the respective types of interventions in the programme.

Yours faithfully,

Silvia MICHELINI

Enclosure: Annex 1 (allocations), Annex 2 (indicators), Application package (application form and budget form)

⁽¹⁰⁾ Art. 63(7) of Regulation (EU) 2021/1060