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# **COVER NOTE**

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Delegations will find attached document COM(2025) 185 final.



Brussels, 23.4.2025 COM(2025) 185 final

ANNEX 1

# **ANNEX**

to the

Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions

2025 State of Schengen Report



#### ANNEX 1

Implementation of the Schengen system: a horizontal and country-specific overview of Schengen evaluation and monitoring activities, including the situation at internal borders

Schengen is the world's largest area of freedom, security and justice without internal frontiers. It benefits more than 450 million EU citizens, along with non-EU nationals living in the EU or visiting the EU as tourists, students or for business purposes. For the past four decades, Schengen has provided this freedom and security thanks to a robust framework that underpins its daily operations. The Schengen system sets harmonised, high-standard rules for entry, ensures rigorous and effective management of the external border, and promotes effective cooperation on law enforcement and immigration matters. The system does not operate in isolation; it is grounded in a governance framework that prioritises effective implementation of the Schengen rules and coordinated responses.

Against this background, the Schengen evaluation and monitoring mechanism plays a key role in promoting the conditions for a well-functioning area without controls at the internal borders. Through this peer-to-peer mechanism, teams of national experts, coordinated by the Commission and supported by observers from EU agencies and bodies, conduct evaluations of each Schengen country to identify deficiencies and ensure their prompt resolution, thus preventing any spillover effects that could jeopardise the integrity and stability of Schengen. The mechanism is also the tool used to assess new countries' readiness to apply all Schengen rules, with the ultimate goal of abolishing control at the internal borders as part of the Schengen accession process.

In 2024, the Commission and the Schengen countries, with strong support from EU agencies and bodies, made continued progress on the third generation of Schengen evaluations. The application of the new Schengen Evaluation Regulation has involved a major simplification and reduction of administrative burden (the new Schengen Country reports resulted in six times fewer reports, leading to fewer recommendations), with more strategic focus and streamlining, and more transparency about the results. This was also supported by strengthening the involvement of national country coordinators. In addition, a comprehensive training strategy was developed to create a unified Schengen evaluation training framework. The Commission will continue to consolidate this new approach with shorter reports and fewer recommendations, while focusing on greater implementation of the most important structural reforms.

Schengen evaluations were carried out in 2024 in Croatia, Poland, Hungary, Slovakia and Czechia, shedding particular light on the situation at the EU's eastern borders. These evaluations highlighted the challenges stemming from the current geopolitical environment, including Russia's hybrid threats, which have significant implications for the internal security of Schengen. Overall, evaluations revealed that these countries are participating effectively in the Schengen architecture and implementing the established rules. However, in the light of

evolving security challenges, there is a need for greater preparedness. While ensuring full respect of fundamental rights at the border was a common challenge, Hungary's evaluation revealed serious deficiencies in the respect of fundamental rights during border and return procedures. Evaluations were also conducted at the consulates of Denmark, Norway and Sweden, related to their 2022 Schengen evaluations on visa policy, helping to finally close the backlog of evaluations that had been postponed due to the COVID-19 pandemic. In addition, one unannounced visit took place in Mumbai, India, on the application of the common visa policy by the consulates of Germany, Poland and Spain.

As part of the evaluation activities, particular focus was also paid to the situation at the internal borders. Although none of the Schengen countries evaluated had reintroduced controls at their internal borders during the evaluation visits, such controls affected some of those evaluated (i.e. Croatia, Poland, Hungary, Slovakia and Czechia) because of reintroductions of such controls by neighbouring countries. The Schengen Coordinator also emphasised this important issue during regular bilateral and multilateral meetings with Schengen countries. Within the framework of this structured dialogue, 15 meetings took place between countries that had reintroduced internal border control and countries affected by such controls. These discussions reaffirmed the targeted nature of internal border controls and provided opportunities to further strengthen cross-border cooperation, taking into account the enhanced tools introduced by the Schengen Borders Code, which came into force last year.

As part of the strengthened **monitoring** efforts under the Schengen evaluation and monitoring mechanism, revisits and verification visits were carried out in Greece (due to serious deficiencies identified in 2021), Ireland (as part of the ongoing first-time Schengen evaluation) and Denmark. The results of all monitoring activities were included in the **2024 Schengen Scoreboard**, which was presented to the Schengen countries during the December Schengen Council.

2024 was also the year to deliver on a key strategic priority, as identified by the European Council, with implementation of the thematic evaluation on more effective returns. The adoption of the report in December 2024 paved the way for concrete improvements to return systems, identifying shortcomings in the return process that limit the system's effectiveness, together with best practices implemented by some Schengen countries that provide solutions to common challenges. The thematic evaluation results have also fed into the Commission's proposal for a new legislative framework on returns, adopted on 11 March 2025, and provide a roadmap for action until the new rules take effect.

Looking ahead in this important year in which we celebrate the 40th anniversary of the Schengen Agreement, one of the key achievements of EU integration, the Schengen evaluation and monitoring mechanism remains central to the work on the ground to implement the Schengen architecture. To reflect the new regulatory framework, the evaluation questionnaire will be updated, and the Commission will sharpen the strategic focus by refining (in close cooperation with the national country coordinators) the scope of evaluation to prioritise areas with the greatest impact. This, in turn, needs to be accompanied by stronger political oversight,

as persistent deficiencies in implementing Schengen rules continue to undermine its proper functioning. Addressing these shortcomings urgently requires tangible remedial action.

## 1. Evaluation and monitoring activities in 2024



## Evaluation activities in 2024<sup>1</sup>

Over the past year, experts from both the Commission and the Schengen countries, supported by observers from EU agencies, offices and bodies<sup>2</sup>, implemented the **2024 annual programme for Schengen evaluations**. The countries evaluated were Croatia, Poland, Hungary, Slovakia and Czechia. Following these evaluations, the Commission adopted **Schengen country reports** for Croatia<sup>3</sup> and Poland<sup>4</sup>, as well as an evaluation report on the serious deficiencies identified in Hungary. Evaluations of Denmark, Norway and Sweden (which had been postponed owing to the restrictions stemming from the COVID-19 pandemic) were also concluded.

Considering the regional dynamics affecting these countries, particularly those exposed to hybrid threats from Russia and the weaponisation of migration by Belarus, high migratory pressure and cross-border crime, specific attention was given to the following priorities:

- solid <u>national Schengen governance</u> as a precondition for Schengen countries to participate effectively in and implement fully the Schengen system, through efficient political and administrative capacities;
- strengthened <u>border management</u> capacities to control external borders effectively, both under normal circumstances and during crises, including robust contingency planning together with full respect of fundamental rights under the European integrated border management;

For an overview of the 2024 evaluation activities see: <u>Schengen Evaluation and Monitoring Mechanism - European Commission.</u>

European Border and Coast Guard Agency (Frontex); European Data Protection Supervisor (EDPS); European Union Agency for Fundamental Rights (FRA); European Union Agency for Law Enforcement Cooperation (Europol) and European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom Security and Justice (eu-LISA).

Schengen Evaluation of Croatia – Executive summary and recommendations available at: <u>Schengen</u> evaluation of Croatia.

Schengen Evaluation of Poland – Executive summary and recommendations available at: <u>Schengen</u> evaluation of Poland.

- fit-for-purpose <u>security initiatives</u> with neighbouring Schengen countries, adopting a comprehensive whole-of-route approach that emphasises proactive cooperation among police forces and the seamless exchange of information;
- rigorous checks of entry conditions of third countries as part of <u>visa</u> procedures, and implementation of efficient processes to <u>return</u> individuals who are not authorised to remain in the Schengen area;
- harnessing of <u>large-scale IT systems</u> to support every stage of the Schengen process, ensuring that their enhanced functionalities deliver tangible outcomes in strengthening security, managing external borders and facilitating information exchange, while respecting data protection requirements.

# **Key conclusions of the 2024 country evaluations**

Overall, the 2024 country evaluations highlighted the growing importance of the Schengen architecture in tackling key challenges faced by Schengen countries and the EU, including greater pressure at external borders, managing internal security in the face of evolving threats and streamlining processes across the board. This was particularly evident in the countries evaluated, especially those along the EU's eastern border, which share similar regional dynamics.

While some of the countries evaluated have made significant progress in implementing the Schengen rules, for instance as regards enhanced land border surveillance and more active police cooperation, others continue to face challenges in fully meeting Schengen's high standards. Vulnerabilities often arise from insufficient specialised resources, misalignment between strategic and operational priorities, and insufficient use of existing technical and legal tools to identify and tackle quickly evolving cross-border security threats.

The 2024 evaluations once again highlight the urgent need to prioritise at political, strategic and operational levels, Schengen policies, processes and tools to ensure effective on-the-ground implementation, thereby contributing to a well-functioning Schengen area.

In February 2024, the Commission carried out an **unannounced visit** to the German, Polish and Spanish consulates in Mumbai, India, to assess the common visa policy. The objective was to assess potential vulnerabilities in this key pre-Schengen entry hub, which is one of the locations that issue the highest volume of short-stay visas, and which faces an ever-growing demand. The evaluation made possible to assess some of the complaints that the Commission receives regularly about excessive waiting times for appointments, which can lead, among other things, to visa shopping. In this context, the evaluation team assessed both cooperation with external service providers and country-specific issues (e.g. for Germany, centralisation of operations in Mumbai). The unannounced evaluation concluded that there were no serious deficiencies in the application of the visa requirements by the three Schengen countries in their respective consulates and that decisions on visa applications were generally well-founded.

Recurrent issues still requiring attention and improvements include cooperation with external service providers and the use of IT systems supporting visa procedures.

#### Monitoring activities in 2024

Continuous monitoring is at the heart of governance efforts to identify challenges and respond with real, measurable results. Therefore, the success of the Schengen evaluation and monitoring mechanism – and, by extension, the stability of Schengen itself – depends on the effective implementation of the recommended remedial measures. The measures are tailored to the specific situation in each Schengen country and are designed to both enhance the application of the Schengen rules and ensure that every Member State contributes positively to collective freedom and security.

In its efforts to strengthen the monitoring dimension of Schengen evaluations, the Commission has stepped up scrutiny of the **follow-up reports** submitted by Schengen countries to identify promptly any gaps and delays in implementation. While the Schengen Scoreboard has made reporting by Schengen countries more consistent and regular, the follow-up reports still need to be submitted on time. In 2024, seven Schengen countries were late in submitting their follow-up reports. Efforts must also focus on improving the quality of reporting to ensure that the information provided is relevant. This will enable the Commission to fulfil its monitoring role effectively and ensure that there is a meaningful exchange, leading to tangible solutions while identifying both progress and remaining gaps.

As part of the enhanced monitoring efforts, the Commission carried out targeted monitoring visits, including one revisit to assess serious deficiencies that had been identified previously and three verification visits to evaluate progress in implementing action plans.

#### Revisit in 2024

• **Greece** (November 2024). Given the serious deficiencies identified in 2021 concerning processes and safeguards in the return of third-country nationals with no legal right to stay, the aim of the visit was to assess the implementation of the remedial measures. Considering the limited progress made by Greece, the evaluation team concluded that the serious deficiencies persist.

#### Verification visits in 2024

- **Greece** management of the external borders (September 2024). The reason for this visit was the limited progress reported by Greece following the evaluation in 2021. The visit highlighted low progress at the strategic level and at the land borders, requiring urgent remedial measures.
- **Denmark** management of the external borders (December 2024). The objective was to evaluate the developments reported by the Danish authorities in strengthening the overall governance and coordination of border management. The visit confirmed that notable improvements had been made; however, further efforts are needed to speed up full

implementation of the reinforced border governance structure, supported by a comprehensive human resources strategy with sufficient staffing and proper training.

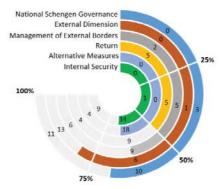
• **Ireland** – internal security as a follow-up to the ongoing first-time evaluation (November 2024). The visit confirmed that significant progress had been made to boost the EU's internal security by implementing the Schengen Information System, including the new functionalities; however, improvements in police cooperation remained limited. Further efforts are required to push forward work under the first-time Schengen evaluation, which would benefit from stronger Schengen governance to ensure the swift implementation of remedial measures.

Currently, three Schengen countries still have serious deficiencies in implementing the Schengen rules<sup>5</sup>. The Schengen Coordinator is following up closely with the relevant national authorities and the Commission is actively monitoring the situation.

Following the latest assessments of follow-up reports submitted by Member States, **the** Commission hereby closes the action plans<sup>6</sup> of Liechtenstein in the fields of the Schengen Information System<sup>7</sup> and police cooperation<sup>8</sup>, and the action plan of Slovenia<sup>9</sup> related to compliance with data protection requirements in implementation of the Schengen architecture, in accordance with Article 21(3) of the Schengen Evaluation Regulation. Considering the results of the evaluation activities carried out in 2024, the Commission has **technically closed** the action plans of Poland that were still open at the time of the evaluation<sup>10</sup>.

### 2. 2024 Schengen Scoreboard

During the Schengen Council meeting in December 2024, the Commission provided ministers of the Schengen area with the 2024 Schengen Scoreboard. The Scoreboard was accompanied by tailored strategic priorities, highlighting the progress made while also urging greater efforts in key areas.



2024 Schengen Scoreboard (aggregation): overall state of implementation by specific dimension

<sup>&</sup>lt;sup>5</sup> Greece, France and Hungary.

The action plans that were not yet closed prior to the 2024 periodic evaluations of Czechia, Hungary and Slovakia will be closed through the Schengen country reports to be adopted in 2025.

<sup>&</sup>lt;sup>7</sup> Closed on 16 October 2024.

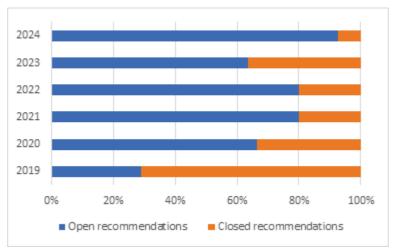
<sup>8</sup> Closed on 1 November 2024.

<sup>9</sup> Closed on 8 November 2024.

<sup>&</sup>lt;sup>10</sup> C(2024) 8110 final of 17 December 2024.

An analysis of the evaluation and monitoring activities conducted in 2024 revealed progress in several important areas, with some Schengen countries making rapid progress in implementing their respective action plans. On Schengen visa policy, for example, several countries reported horizontal improvements in addressing deficiencies in the practices of external service providers. Norway and Sweden, in particular, despite being evaluated in the visa field in 2024, have made substantial progress and are close to completing their action plans. Similarly, Cyprus has undertaken significant efforts to implement the remedial measures required, with notable improvements in the return process and the Schengen Information System. Meanwhile, the evaluations of Poland and Hungary, while leading to new recommendations, also highlighted significant progress in implementing the remedial measures from the previous evaluation cycle.

However, the 2024 Schengen Scoreboard also confirmed a persistent trend observed in recent years, namely the **uneven pace of implementation** of recommendations at national level following a Schengen evaluation. While the Schengen Scoreboard provides a snapshot of the implementation status at a given time<sup>11</sup>, Schengen countries evaluated in the same year, and therefore expected to be at similar stages of implementation, still show significantly different levels of progress. For instance, whereas two of the Schengen countries that are being evaluated in 2025 have almost fully implemented all recommendations, this is not true for the third country.



State of play in implementing the Schengen evaluation recommendations as of April 2025

Moreover, a significant number of **longstanding deficiencies persist** in several Schengen countries years after their evaluations took place; many of these deficiencies relate to core aspects of the Schengen framework. This undermines the effectiveness of the Schengen evaluation and monitoring mechanism in supporting fully the functioning, security and

Lithuania) have not yet had the opportunity to submit either their action plans, which include the planned remedial measures to be taken, or their first follow-up reports, as the deadlines have not yet expired.

In line with the methodology for the Schengen Scoreboard, the 2024 Schengen Scoreboard does not include scores for Czechia, Hungary, Poland and Slovakia, as the country reports with the respective recommendations following the 2024 periodic evaluations had not yet been adopted. Bulgaria and Romania were also not included, as their first periodic evaluation will only take place in the second half of 2025. Schengen countries recently evaluated in 2023 and early 2024 (i.e. Croatia, Estonia, Finland, Latvia and

integrity of the Schengen area. This, in turn, creates critical vulnerabilities that, if not addressed swiftly, could have a substantial negative impact on the overall functioning of Schengen.

A horizontal element requiring **urgent remedial action** concerns implementation of the large-scale IT systems that underpin the Schengen architecture – a vulnerability with far-reaching security implications for border management, migration and law enforcement. This was identified as a major shortcoming in at least half of the countries evaluated. Despite the enhanced functionalities of the Schengen Information System – designed to reinforce security and streamline procedures – their full potential remains unrealised, as Schengen countries are not using the system to its required standards and capabilities. For example, five countries still fail to issue alerts on vulnerable people, such as children at risk of abduction, while one country is responsible for issuing 75% of such alerts. Only 16 countries have created alerts for inquiry checks, leaving critical gaps in the system: these checks make it possible to obtain information on people or related objects for the purposes of prosecuting criminal offences and preventing threats to public or national security. These gaps affect the security of Schengen as a whole.

At the same time, Schengen countries are not adequately putting essential data into the system, even when such information is readily available at the national level. At the beginning of 2025, there were around 1.7 million alerts on individuals, of which only around 900 000 (52%) included photographs and only around 600 000 (35%) contained fingerprints. These severe gaps significantly hamper countries' ability to identify individuals, particularly those posing security threats. Furthermore, Member States at times need to improve a number of data protection requirements of the large-scale IT systems and to enhance the monitoring of those requirements. Addressing these shortcomings is not just a technical necessity but a fundamental requirement for safeguarding the integrity and security of the Schengen area.

The Commission calls on all Schengen countries to pursue effective follow-up to the results of the 2024 Schengen Scoreboards and to actively engage, as appropriate, with the Schengen Coordinator. Where recommendations have **financial implications** for the Schengen countries, the Commission invites those countries to prioritise their implementation within the national programmes of EU funds<sup>12</sup>. Although significant financial resources are available, EU funding is often not directed where it is most needed. Stronger links need to be made between Schengen evaluation recommendations, vulnerability assessments and funding under the new multiannual financial framework.

# 3. Thematic Schengen evaluations for 2024

Thematic Schengen evaluations provide a unique opportunity to assess the state of implementation of the Schengen rules across Schengen countries at a specific point in time and to compare practices among those facing similar challenges.

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The Integrated Border Management Fund – Border Management and Visa Instrument, the Asylum, Migration and Integration Fund and the Internal Security Fund.

#### Thematic evaluation on more effective returns

Over the past year, the European Council has called for determined action at all levels to facilitate, **increase and speed up returns** from the EU, using all applicable EU policies, instruments and tools. More effective implementation of current legislation on return, coupled with further work on a common approach to return, also supports a faster and more efficient implementation of the Pact on Migration and Asylum.

In response to this call for action, the **thematic Schengen evaluation on more effective returns** was carried out and finalised in 2024. The report was adopted in December 2024 and includes a cross-cutting analysis of current instruments that can contribute to this goal, including the European Border and Coast Guard Regulation, the Return Directive, the Schengen Borders Code and the Schengen Information System.

The evaluation team was made up of 15 experts from Schengen countries, two Commission experts, one observer from Frontex, and one observer from the Agency for Fundamental Rights. The team worked throughout 2024 to perform a thorough analysis and carried out visits to Italy, Norway and the Netherlands to evaluate practices that, owing to their specific nature, could not be assessed effectively remotely.

The evaluation highlighted the complexity of return processes, which apply to a diverse range of third-country nationals, including:

- people entering the Schengen area legally but overstaying their permit or legal stay (e.g. visa-free nationals);
- people entering illegally and being apprehended at the external borders; and
- people apprehended within the territory of a Schengen country due to illegal stay following either legal or illegal entry.

As such, effective return measures are among the most sustainable tools for safeguarding the area of freedom, security and justice without internal frontiers.

Given the multiple stakeholders, processes and mechanisms involved, the thematic Schengen evaluation report emphasised the importance of return as a key part of European integrated border management. To achieve this, effective interagency cooperation at national and European levels is crucial, together with a sufficient level of preparedness and better exchange of information. This is necessary both for efficient and informed decision-making and for the enforcement of return decisions. All this can be facilitated through the Schengen Information System. The report identifies common challenges related to key phases of the return process, including its initiation, identification of third-country nationals, voluntary and forced returns, as well as the cooperation structures and mechanisms that support these processes.

Based on the evaluation report, the Council adopted recommendations to tackle the common challenges identified<sup>13</sup>. The evaluation report also identifies best practices from some Schengen countries that can help implement remedial measures.

The results of the thematic evaluation fed into the proposal for a new common approach on returns, as presented by the Commission in March 2025<sup>14</sup>. They form a roadmap for improving national return systems until the new legislative framework is fully in place.

### Follow-up to the thematic evaluation on European Integrated Border Management (EIBM)

Integrated border management is a key objective of the EU, as established by Article 77(2)(d) of the Treaty on the Functioning of the European Union. It aims to facilitate border crossings and ensure a uniform, high level of border control at the EU's external borders, thereby contributing to the EU's internal security and efficient migration management, while respecting fundamental rights. It is based on the four-tier access control model, comprising measures in third countries, such as under the common visa policy, measures with neighbouring third countries, border control measures at the external borders, risk analysis and measures within the Schengen area and return.

A thematic evaluation of the Schengen countries' national strategies for integrated border management was carried out in 2019-2020. Following the thematic evaluation, the Council adopted a Decision setting out a Recommendation on addressing the deficiencies identified in the 2019-2020 thematic evaluation of Member States' national strategies for integrated border management<sup>15</sup>. The Recommendation identified the most important aspects for countries to consider when revising their national strategies.

In the second half of 2024, the Commission and Schengen country experts<sup>16</sup>, together with an observer from Frontex, the European Border and Coast Guard Agency, looked into what progress had been made so far. They looked at the extent to which the revised national strategies were aligned with EU policy priorities, focusing on governance mechanisms, resource planning and strategic objectives. Using 140 indicators, the evaluation assessed the extent to which recommendations from the previous evaluation had been implemented and identified areas still requiring further attention.

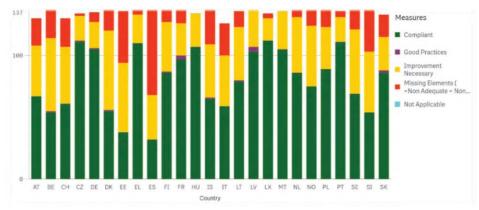
This comprehensive analysis is a key tool for enhancing the coherence and operational effectiveness of Schengen governance and strengthening the implementation of European integrated border management at both EU and national levels.

Council Implementing Decision of 6 March 2025 setting out recommendations addressing identified common areas for improvement resulting from the 2024 thematic Schengen evaluation 'Bridging national gaps: towards an effective EU return system through common solutions and innovative practices'.

<sup>14</sup> 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.

<sup>15</sup> Council document 6755/21 of 8 March 2021.

Belgium, Germany, Greece, France, Hungary, Italy, Netherlands, Portugal and Romania, led by Norway.



Results of the assessment

The results show notable improvements, a sign that countries are highly committed to making progress in line with the European multiannual strategic policy cycle. Key improvements since the 2019-2020 evaluation include stronger governance mechanisms at both national and EU levels, a more coherent risk-based approach to border control, and better strategic planning for financial resources. In particular, the return component has become central to national strategies, reinforcing the integrated approach by also integrating migration management, though further harmonisation is still needed. Another major step forward is the enhanced focus on internal security, which is now a core pillar of integrated border management across Schengen countries.

However, gaps remain. National strategies often lack alignment with capability planning, particularly in human resources, training and investment in infrastructure and equipment. Additionally, interagency cooperation remains fragmented, limiting the effectiveness of governance structures. These persistent shortcomings, already identified in the previous evaluation, highlight the need for further integration and strategic coordination to ensure a truly unified and resilient European integrated border management system.

### Follow-up to the thematic evaluation on drug trafficking into the Schengen area

Considering the significant increase in drug trafficking into the EU, as evidenced by recordbreaking cocaine seizures<sup>17</sup>, a thematic evaluation was carried out from February to November 2023 to identify best practices in countries' national capabilities in combating drug trafficking into the EU. As a result, in March 2024, the Council adopted an Implementing Decision<sup>18</sup> setting out a recommendation for the implementation of the best practices identified in the 2023 thematic Schengen evaluation.

17 The fourth comprehensive overview of illicit drug markets in the European Union, conducted by Europol and the European Monitoring Centre for Drugs and Drug Addiction (EMCDDA - renamed the European Union Drugs Agency (EUDA) as of July 2024).

Council Implementing Decision of 5 March 2024 setting out a recommendation on the implementation of the best practices identified in the 2023 thematic Schengen evaluation of Member States' capabilities in the areas of police cooperation, protection of the external borders, and management of IT systems to fight against drug trafficking into the Union.

Given that the primary aim of this thematic Schengen evaluation was to identify best practices, Schengen countries were encouraged to assess the added value and feasibility of incorporating these practices into their national frameworks, consulting, where relevant, with countries that had already implemented them.

Of the 27 Member States and associated countries evaluated, all but one country submitted action plans to the Commission and the Council. The Commission received action plans from Austria, Belgium, Croatia, Czechia, Denmark, Estonia, Finland, Germany, Greece, Hungary, Iceland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden and Switzerland.

In 2024 the Commission reviewed<sup>19</sup> the action plans submitted to check for implementation of the Council recommendation requiring countries to analyse and consider the implementation of best practices identified during the thematic evaluation in their respective national systems.

Based on the action plans submitted, the Member States that intend to implement, or have already implemented, the highest number of best practices are Austria, Belgium, Croatia, Czechia, Denmark, Estonia, Greece, Malta and the Netherlands. Furthermore, best practices in mapping illicit drug flows demonstrate the highest total implementation rate, showing a strong collective commitment and significant progress in identifying illicit drug flows to the Schengen area. By contrast, best practices for creating barriers and increasing the resilience of logistical hubs demonstrate a notably low overall implementation rate, emphasising the considerable challenges that may arise from resource limitations, operational complexities, or divergent national priorities. The lack of substantial progress in this area is particularly concerning given the strategic importance of logistical hubs, which represent critical points of vulnerability in the fight against drug trafficking. Addressing these challenges will require greater coordination, targeted funding, and more technical support for countries that are struggling in this area.

Based on the information provided in the action plans, the Commission considers all the action plans submitted to be closed, with one exception. The implementation of best practices will continue to be monitored through periodic Schengen evaluations, in accordance with the multiannual evaluation programme and set out in the Council Implementing Decision.

#### 4. Situation at the internal borders

On 1 January 2025, internal border control at the internal land borders with Romania and Bulgaria was lifted, leaving only one EU Member State, Cyprus, awaiting the lifting of internal border controls.

On 10 July 2024, the revised Schengen Borders Code<sup>20</sup> entered into force, setting out a new framework for the reintroduction of internal border control, with revised deadlines and stronger

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In line with Article 21(2), first subparagraph of Regulation (EU) 2022/922.

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).

requirements for monitoring and reporting. Based on these new rules, the Commission has adopted implementing decisions creating a template for countries to notify the reintroduction or prolongation of internal border control, together with a uniform format for reporting on the reintroduction or extension of internal border control<sup>21</sup>.

Since the entry into force of the amended Schengen Borders Code, **10 Schengen countries** have reintroduced border control at their internal borders<sup>22</sup>. Six Member States (i.e. Austria, Denmark, France, Germany, Norway and Sweden) already had border controls in place for extended periods prior to the entry into force of the amended Schengen Borders Code. Germany has subsequently extended the geographical scope of these controls to all its internal borders. The Netherlands notified the reintroduction of border control for the first time at all its land and air borders. Bulgaria temporarily reintroduced internal border control at its land borders, as a preventative measure, following the lifting of controls at the internal borders.

The Commission applies the new deadlines and reporting obligations to all reintroductions and prolongations that have been notified since the entry into force of the amended Code.

As part of its ongoing dialogue on internal border control, the Commission has been in close contact with the countries that have reintroduced internal border control, as well as with countries affected by the reintroduction of such measures. These discussions have fostered an exchange of information between the country concerned, as well as between the Commission and the Schengen countries. The Commission has emphasised that countries are obliged to adopt mitigating measures to limit, as much as possible, the impact of a border control on cross-border travel, freight operations<sup>23</sup> and the functioning of cross-border regions. Discussions have also focused on the continued progress in following up on the Commission's Recommendations of November 2023 on alternative measures to address serious threats to public policy and national security<sup>24</sup>.

At the same time, the Schengen evaluations carried out in 2024 visited police and customs cooperation centres and police stations in the internal border regions. These visits aimed to verify whether structures and procedures ensure timely exchange of information and effective joint operations, addressing cross-border crime, irregular migration and threats to public safety. The overall purpose of these assessments was to (a) ensure efficient information sharing and

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Commission Implementing Decision (EU) 2025/315 of 14 February 2025 establishing a template for the notification of the temporary reintroduction or prolongation of border control at internal borders. C/2025/902; Commission Implementing Decision (EU) 2025/308 of 14 February 2025 establishing a uniform format for the report on the reintroduction or prolongation of border control at internal borders in accordance with Article 33 of Regulation (EU) 2016/399 of the European Parliament and of the Council. C/2025/905.

For an overview see: Temporary Reintroduction of Border Control - European Commission.

According to the Commission's Green Lanes Communication, freight vehicles should not face more than 15 minutes total delay in crossing internal borders of the Trans-European Transport Network (TEN-T) network irrespective of the goods they carry. The Commission has continued to organise meetings with the Network of National Transport Contact Points whenever potential issues have been identified that could negatively affect the flow of road carrier transport within the internal market.

Commission Recommendation of 23.11.2023 on cooperation between the Member States with regard to serious threats to internal security and public policy in the area without internal border controls. C(2023) 8139 final.

operational cooperation among law enforcement authorities, thereby enhancing internal security, and (b) identify areas needing improvement or corrective actions. These monitoring activities and discussions revealed the non-systematic nature of checks.

The Commission is also working to ensure that no Schengen country or cross-border region is particularly affected by the reintroduction of internal border controls, notably those with a unique geographical situation. Relevant steps are being taken to address instances where the reintroduction of internal border control causes serious inconvenience to the daily lives of individuals and businesses.

The Commission has also promoted operational cooperation between Schengen countries to address the security and migration concerns of the Member States in a more effective and efficient manner. The Commission has also fostered the development of regional cooperation along migration routes, actively engaging with third countries as well. To ensure the fast, but also orderly, turning back of irregular migrants at the internal borders, Schengen countries must apply their pre-existing bilateral readmission agreements, or alternatively conclude operational arrangements to put into effect the transfer procedure introduced under the amended Schengen Borders Code.

So far, one Member State, Germany has prolonged internal border control since the entry into force of the amended Schengen Borders Code. At the request of Luxembourg, the Commission has already launched a consultation<sup>25</sup>. This has resulted in meetings at operational and ministerial levels aimed at addressing practical impediments to cross-border flows and increasing cooperation on alternative operational measures. The Commission remains committed to upholding the principles of free movement and security across the Schengen area and will follow-up as necessary in the upcoming Schengen cycle, including with the issuance of opinions as set out in the revised Schengen Borders Code.

# 5. Schengen evaluation and monitoring tools

In November 2024, the Commission established the **2025 pool of Schengen evaluators**. In line with the requirements of the Schengen evaluation and monitoring mechanism, nearly all Schengen countries designated at least one expert. Only one country refrained on the grounds that the designation would substantially affect the discharge of national tasks<sup>26</sup>, and was therefore unable to nominate at least one expert for each field of the Schengen system<sup>27</sup>.

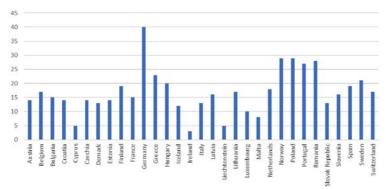
In total, 545 national experts were designated, out of which **525 national experts** were selected for the 2025 pool, taking into account the general and specific criteria laid down in Regulation (EU) 922/2022 and in the relevant invitation to the Schengen countries<sup>28</sup>.

In line with Article 27a of Regulation (EU) 2016/399.

In line with Article 17(2) of Regulation (EU) 2022/922.

Denmark did not nominate an expert on police cooperation.

<sup>&</sup>lt;sup>28</sup> Article 15(1) of Regulation (EU) 2022/922.



Number of experts selected per Schengen country (2025)

To ensure a high-quality pool of experts for evaluation and monitoring activities, a **Schengen evaluation training strategy was drawn up in 2024**. The strategy sets out the core aspects of the Schengen evaluation training activities, based on short and medium-term objectives, with a view to implementing a coherent methodology for a common and integrated Schengen evaluation training framework. It aims to deliver, among other things, a common curriculum for all training activities, strengthened governance for training implementation and a streamlined selection of trainees, thereby improving synergies with the pool of Schengen evaluators. In 2024, **90 experts were trained and certified** as Schengen evaluators in initial training activities under this common framework.

The third **country coordinator and lead expert workshop** took place in January 2025, bringing together Schengen countries and Commission country coordinators along with the designated lead experts for the 2024 and 2025 evaluations. More than 40 senior experts from Schengen countries, representing a community of more than 500 Schengen evaluators, had a strategic exchange about the future of the Schengen area and, in particular, about how to reinforce the governance framework at both European and national levels. The workshop also aimed to prepare national country coordinators and lead experts for the 2025 Schengen evaluation activities.

#### 6. Looking ahead: evaluation and monitoring activities in 2025

2025 marks the **40th anniversary** of the signing of the Schengen Agreement on 14 June 1985. This milestone will shape the agenda for Schengen governance throughout the year, reaffirming Schengen as a symbol of our collective achievement, namely a secure and united Europe benefiting European citizens and businesses alike. As we celebrate this important achievement, Schengen will remain at the core of the Commission's priorities and an essential strategic asset for navigating the evolving geopolitical landscape.

The Schengen evaluation and monitoring mechanism will continue to reflect the dynamic and evolving nature of the Schengen project, ensuring its resilience and effectiveness in a changing environment. New legal requirements have been adopted, in particular those stemming from the Pact on Migration and Asylum (e.g. Screening Regulation, Return Border Regulation) and those connected to the new digital architecture supporting border management and the internal

security of the Schengen area (e.g. Interoperability regulations, ETIAS procedures, law enforcement access to EES, ETIAS, Interoperability, Exchange of information Directive).

On the back of this, the Commission, in consultation with the Schengen countries and relevant EU bodies, will revise<sup>29</sup> the **standard Schengen questionnaire** in 2025. The updated questionnaire will also strengthen the strategic aspects underpinning the well-functioning of the Schengen area, such as Schengen governance and the use of related EU financial instruments.

In line with the multiannual evaluation programme for 2023-2029, the **2025 annual evaluation programme**<sup>30</sup> will be implemented. This includes the periodic evaluations of Switzerland, Slovenia and Austria, together with evaluations of Bulgaria and Romania following their full integration into the Schengen area without controls at the internal borders. As regards **monitoring activities** for 2025, the Commission is planning to carry out visits to France (which has already taken place in March 2025), Greece (September 2025) and Portugal.

	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul Aug.	Sep.	Oct.	Nov.	Dec.
Periodic evaluation	Switzerland		Slovenia		Austria			Romania		Bulgaria	
First-time evaluation											
Thematic evaluation											

Given the specific role of **thematic evaluations** in identifying and addressing cross-cutting challenges for the Schengen area, such as drugs trafficking and return in the two previous years, following consultations with Schengen countries, the Commission considers 2026 to be an opportune moment to launch another thematic evaluation. With the ongoing war in Ukraine and the continuing increased security risks, this evaluation would aim to identify gaps and vulnerabilities in the Schengen border and security architecture, with a view to reinforcing its coherence and increasing the overall level of internal security.

Furthermore, in 2025, the Commission will continue to monitor the follow-up to the ongoing first-time Schengen evaluations to push forward the technical readiness of both countries concerned. For **Cyprus**, the necessary visits<sup>31</sup> could still take place in 2025, provided that the required remedial measures have been implemented by the Cypriot authorities. For **Ireland**, the Commission intends to issue the Schengen report covering judicial cooperation in criminal matters, drugs cooperation and Article 26 of the Schengen Convention in the first half of 2025. If the outcome is positive and remedial measures in other relevant areas, notably police cooperation, are implemented swiftly, it will enable the Council to put these provisions into effect in Ireland and will lead to increased Schengen cooperation.

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In line with Article 14 of Regulation (EU) 2022/922.

The 2025 annual evaluation programme available at <u>Annual evaluation</u>.

Article 23 of Regulation (EU) 2022/922.

The Commission will also intensify its efforts in 2025 to support the seamless integration of Schengen requirements for countries aspiring to join the EU. As **EU candidate countries** are Schengen candidates, the EU enlargement process has significant implications for Schengen. EU candidate countries must meet all Schengen requirements by the time they join the EU, even if some Schengen rights, such as full active access to all information systems, the right to issue Schengen visas and the right to abolish controls at the internal borders, will only apply at a later stage. The Commission will work closely with candidate countries so that, by the time they join the EU, the Schengen system is anchored in a fully functioning national Schengen governance framework. This requires robust preparation, including the implementation of Schengen action plans, as set out in the 2024 Communication on EU enlargement policy<sup>32</sup>.

Finally, concerning training, implementation of a **common curriculum** in the initial training courses in 2024 has created a solid foundation for designing future training. The next initial training activities are scheduled for spring, summer and autumn 2025.

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Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the regions 2024. Communication on EU enlargement policy. COM(2024) 690 final.