

Final

23rd meeting of the Coordinated Supervision Committee

21 and 22 April 2026, In person meeting

Summary

The Coordinated Supervision Committee ('the Committee' or 'the CSC') met on 21 and 22 April 2026, physically.

General part

- **Elections of a new Coordinator**

The Coordinator announced the upcoming end of her mandate in July 2026 and the election of a new Coordinator during this meeting to ensure business continuity.

Ms. Maria Concetta Causarano, from the Italian DPA, was elected as new Coordinator of the CSC. Her mandate will take effect as of the expiry of the mandate of the current Coordinator.

Review of the RoP

The Coordinator reiterated the intention to review the CSC Rules of Procedure in order to reflect the recently established working methods. It was agreed to develop the working methods and prepare a revised draft of the CSC Rules of Procedure for discussion by the Committee.

New systems: prioritisation

The Coordinator recalled the discussions during the previous meetings of the Committee that it had been agreed to prepare a preliminary ranking of the new systems under the Committee's supervision in order to invite the Commission to provide details at the following meetings and to define the Committee's role and priorities according to the ranking. The prioritisation of the five systems, as formulated following the expression of the CSC members' preferences, was presented.

A discussion followed on the next steps. The CSC members agreed to invite the Commission at the following meetings of the Committee to provide details on each system and the personal data processing under each new legislative act in the order of this prioritisation.

- **AOB**

Adopted on 24.06.2026

Furthermore, concerns were expressed about the access of non-EU countries' authorities located at the external borders to several large-scale IT systems under the Committee's supervision, which is performed by the national police and reported relevant issues, including international transfers of personal data.

VIS

The CSC members shared their experience on any inspections and audits performed by the SAs in the respective Member States with respect to VIS. Several members intervened presenting the scope of the inspections and audits, which covers the external service providers, as well as access by security and law enforcement authorities to VIS data and the checking of relevant logs. The CSC members supported the organisation of a workshop to exchange further experiences and best practices.

The CSC members also agreed to develop a Guide for exercising data subject rights in VIS.

ETIAS

- **Capacity building: Presentation on data flows by Frontex followed by a Q&A**

The Frontex representative presented the data flows with respect to ETIAS and provided an overview of the data flows concerning the completion and submission of an application, the creation of the application file in the ETIAS Central System and of the third-country national ID in the Common Identity Repository or linking with an existing file and the automated processing of the applicant's datasets.

A discussion followed and the Frontex representative explained that the design of the data flows aims to support the drafting of the DPIAs.

The CSC members will now submit any questions on the presented data flows, which will then be shared with Frontex.

- **Allocation of controllership**

The Coordinator recalled that a note on the controllership for data processing operations related to ETIAS and the arguments towards the determination of joint or sequential controllership had been presented during the CSC meeting of 9 & 10 December 2025. The ETIAS WG then provided an update on the relevant discussions within the WG and the approach followed by the ETIAS competent authorities. The CSC members were invited to submit any positions or legal arguments on the matter.

- **Interpretation of the public authority exception in the definition of recipients**

The rapporteur provided an update on the discussions of the note on the interpretation of the public authority exception in the definition of recipients during the joint CSC-KEYP-BTLE meetings of 18 February 2026 and of 20 March 2026. Furthermore, the rapporteur presented the draft info note, in which a preliminary list of elements had been included to provide guidance in interpreting the public authority exemption. The CSC members agreed to request strategic guidance from SAESG on this topic.

- **Article 64(6) ETIAS Regulation**

The rapporteur recalled that Article 64(6) of the ETIAS Regulation requires ETIAS National Units and the ETIAS Central Unit to make available to supervisory authorities written records concerning data subject requests and how they were handled and explained the two inter-linked issues raised by this obligation.

The CSC members exchanged their views on several questions, including the types of data subject requests which must be disclosed in the context of the reporting obligation according to Article 64 (6) of the ETIAS Regulation, the purpose of the reporting obligation to the SAs and their tasks after receiving the information, as well as on the content of the written document. The CSC members will submit their written responses to the questions raised in the given deadline.

EES

- **Access Guide**

The rapporteur recalled that during the previous meeting of the Committee it had been agreed to prepare an Access Guide to the EES for data subjects aiming to provide clear guidance to data subjects to enable them to exercise their rights under EES. To that end, the rapporteur presented the structure and the content of the draft Access Guide. A discussion followed and the CSC members shared their views on the interpretation of Article 52 EES Regulation, the applicability of Article 52(2) and further, to right of access, the advice and assistance from the national data protection authority of each Member State pursuant to Article 53(2) EESR and the cooperation between SAs to enforce the rights on data protection. The CSC members will now comment on the draft Access Guide in order to provide clear and precise guidance to facilitate the exercise of data subject rights under the EES and to clarify the implications of the cooperation requirement between SAs under Article 53(2) EES Regulation.

- **Tour de table on national developments**

The CSC members shared their experience with respect to EES and several issues identified at national level, including implementation issues concerning the access of law enforcement authorities to EES and the absence of safeguards in place for the effective protection of data subject rights.

CIS

The CSC members were informed that the Customs Information System Supervision Coordination Group ('CIS SCG') had adopted the text of a letter of the CIS SCG to the European Commission concerning the transfer of the coordinated supervision of the CIS to the Committee and seek the CSC's endorsement to co-sign the letter. The rapporteur then presented the main objective and the content of the letter. Following a modification proposed, the letter will be submitted for endorsement by the EDPB members at the Plenary meeting of 8-9 June 2026.

SIS

The Secretariat presented the draft SIS Statistics report, which incorporates the information provided by the national competent authorities. The CSC members will now assess whether the figures in the tables in the report reflect the numbers provided in the national contributions and submit any comments on the report. The CSC members will also submit their questions and concerns regarding the reporting template and the interpretation of what information should be provided in it.

Working Group on Law Enforcement

It was recalled that during the previous meeting of the Committee it had been agreed to establish a Working Group on Police and Judicial Cooperation. The coordinators of the WG provided an update on the kick-off meeting and explained the scope and the objectives of the WG and submitted several proposals for upcoming work items for discussion by the CSC members.

Europol

- **Report on joint supervisory activity on the processing of minors**

The rapporteur presented the final report and the main findings of the joint supervisory activity on the processing of data of minors under 15 labelled as suspects in Europol systems. The CSC members adopted the report and agreed to publish it on the [CSC website](#).

- **Report from EDPS**

- 2025 Inspection Report: findings

The EDPS recalled that the joint inspection of Europol had taken place on 2 and 3 July 2025 and presented the main findings of the report. The inspection concerned the use of SIS, the facial recognition processes, with a focus on NeoFace Watch (NFW), transfers of personal data to third countries and international organisations and exchanges of personal data with private parties.

- Supervisory Opinion on the Virtual Command Post

The EDPS presented its Opinion on Virtual Command Post. This Opinion was issued following a consultation received from Europol regarding a planned processing of operational personal data using the Virtual Command Post ('VCP'), which is an instant messaging solution designed to enhance coordination between Europol, Member States ('MS'), EU Institutions, Bodies, Offices and Agencies ('EUIBOAs'), Third Parties ('TPs') and Private Parties ('PPs') during operations that are spread across diverse geographical areas.

- **AOB**

The Coordinator informed the CSC members about the envisaged revision of the Europol Regulation and modification of Chapter 9 EUDPR in order to simplify compliance and address possible inefficiencies. The CSC members will be kept updated in this regard.

Eurojust

- **CTR**

The rapporteur presented the final report, which includes the findings following the assessment of the responses received to the questionnaire on data quality in the Counter-Terrorism Register ('CTR'). The CSC members adopted the report.

- **Questionnaire on supervisory authorities**

The drafting team presented the info note, which includes the analysis of the contributions provided to the Questionnaire on the DPAs' supervision of the national judiciary bodies and explained that the

aim of the data collection exercise was to assess whether the national supervisory authorities represented at the CSC are indeed those vested with authority over their respective national judiciary authorities.

The CSC members provided comments on the info note, requested additional information about the criteria determining whether prosecutors are excluded from the DPAs' supervision and about the nature of the different supervisory authorities in order to verify the independence of such supervision and reported several issues with respect to the supervision of the national judiciary bodies. The drafting team will now prepare a revised version of the info note and submit it for discussion at the next meeting of the Committee.