

Final

## 21st meeting of the Coordinated Supervision Committee

9 and 10 December 2025, Presential meeting

### Summary

The Coordinated Supervision Committee ('the Committee' or 'the CSC') met on 09 and 10 December 2025, physically.

#### General part

- **Elections of a Deputy Coordinator and a Coordinator in 2026**

Fanny Coudert, the Coordinator, announced the upcoming end of her mandate in July 2026 and the election of a new Coordinator during the CSC meeting of April 2026 to ensure business continuity.

The Coordinator also announced the upcoming end of the mandate of Matej Sironic, one of two Deputy Coordinators, in April 2026. The election of a new Deputy Coordinator will take place during the CSC meeting of February 2026 to ensure business continuity.

#### Review of the RoP

The Coordinator announced the intention to review the CSC Rules of Procedure in order to reflect the recently established working methods. A discussion followed on specific provisions to be reviewed. The CSC members will now submit their suggestions, which will be used to prepare a revised draft of the CSC Rules of Procedure for discussion by the Committee.

#### IMI

- **Questionnaire: Preliminary findings and way forward**

The Secretariat presented the first findings following the preliminary assessment of the responses received to the questionnaire on Management of users' access to IMI within the Ministry of Commerce. The CSC members then discussed the next steps and approach in relation to this topic. It was agreed to establish a drafting team to prepare an info note concerning the allocation of roles in IMI and the CSC members were invited to participate in the drafting team.

9-10.12.2025

## New systems: prioritisation

The Coordinator recalled the discussions during the previous meeting of the Committee where 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 CSC members will now express their preferences on five systems, considering several criteria and the description of each system.

## SIS

- **Checking logs of Article 12 SIS Regulations**

The rapporteur recalled that it had been agreed to develop and provide guidance on checking logs of Article 12 SIS Regulation for the national competent authorities based on the internal discussions on SIS log checks. To that end, the rapporteur presented the envisaged scope, targeted audience and potential format of this guidance as well as the next steps following the adoption. A discussion followed on the structure of the guidance. The CSC members will now share the national experience on automatic log control mechanisms and the national guidance on the expectations from an inspection by a DPA, which will be incorporated in the guidance.

- **2024 SIS Report**

The Secretariat presented the draft SIS Statistics Report. The CSC members now will verify the figures provided in their national contributions and submit any further comments. The CSC members highlighted that the reporting template provided by the Commission lacks some clarity and agreed to reach out to the Commission in order to ensure data quality in the future reports. Regarding the next steps, the Report will be finalized and published on the CSC website.

- **EDPS Prior Consultation Opinion on Europol SIS Information alerts**

The EDPS presented its Opinion on Europol SIS Information alerts. The Opinion examines Europol's proposed implementation of 'information alerts', i.e. a mechanism that would enable Europol to propose the insertion of new SIS alerts, with the final decision remaining with national authorities. The CSC members now will exchange views on the interpretation of Article 36(3)(c) of SIS Regulation.

## EES

- **Guide on DS rights**

The CSC members agreed to develop and provide guidance on the data subject rights in EES.

- **Implementation issues**

It was recalled that the EES entered into force on 12 October 2025 and would be fully operational in all Schengen states on 10 April 2026. The CSC members then shared the state of play in the respective Member States, any activities performed by the SAs with respect to EES and several issues identified at national level, possible non-compliance with the obligation to provide information under Article 50(2) EES Regulation and other issues concerning the data subject rights.

- **Art. 13 EES Regulation: transfers to private carriers**

The CSC members were informed about questions raised by eu-LISA in relation to transfers of information operated on the basis of queries of the EES by international carriers, pursuant to Article 13 of the EES Regulation. Following the point of information, CSC exchanged views concerning allocation of controllership over such processing operations.

- **EDPS Prior Consultation Opinion on Europol's access to EES**

The EDPS presented its Opinion on Europol's access to EES. The Opinion examines Europol's possibility to query the EES pursuant to Article 33 EES Regulation to identify unknown suspects and consult the travel history of known suspects. Such searches can be carried out using alphanumeric data, but also on the basis of biometric data and personal data relating to categories of data subjects referred to in Article 30(1) EES Regulation.

## ETIAS

- **Info note on recipients. Update on consultation with KEYP.**

The CSC members were informed that the CSC coordinators had discussed the way forward regarding the note on the definition of recipients with the KEYP and BTLE coordinators. An initial introductory KEYP–CSC meeting, with the participation of BTLE members, will take place during the next meeting of the Committee for the presentation of the note and a preliminary discussion with the KEYP and BTLE members.

- **Info note on controllership. Way forward**

The ETIAS WG presented a note on the controllership for data processing operations related to ETIAS and explained the arguments towards the determination of joint or sequential. The CSC members agreed to identify the relevant data flows and prepare a statement reflecting the position of the Committee on the concept of “retroactive controllership” and including further considerations on the provisions of the ETIAS Regulation.

- **EFRGB**

- Appointment of a new EDPB member (alternate)

Following the resignation of two alternate EDPB representatives to the ETIAS Fundamental Rights Guidance Board (EFRGB), a call for candidates for the position of the alternate EDPB representative will be launched. The appointment of the EDPB representatives will be confirmed by the EDPB Plenary.

- Report on activities

The rapporteur reported on the activities of the EFRGB, on the discussions that took place and on the data protection issues encountered, including the processing activities to be covered on the ETIAS website, the handling of applicants requests, the DPIA, the use of artificial intelligence, the lack of a consultation mechanism in relation to the data subject access requests and on the processes of the consultation of Europol for the assessment of the applications.

- Pilot: tour de table of DPAs participating in the pilot

The SAs which volunteered to participate in business testing and assess the compliance and suitability of the S-CIRCABC for their operations provided information about the current status of this project at national level.

## Eurojust

- **Questionnaire on supervisory authorities**

A new questionnaire aiming at gathering feedback from the SAs on their supervision of the national judiciary bodies was adopted. A discussion on the way forward followed. The CSC members will now respond to the questionnaire and the drafting team will analyse the responses received.

- **EDPS Opinion on the role of Eurojust as contact point in the context of ECRIS-TCN**

The EDPS presented its Opinion on Europol's role as contact point in the context of ECRIS-TCN. This Opinion was issued following a consultation received from Europol regarding the criminal records database for third-country nationals, which will enter into operation during the first half of 2026. The provision of Article 17 Regulation (EU) 2019/816 was further explained and a discussion followed on the similar provisions for EES and Eurojust.

## Europol

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

The drafting team presented the final report, which includes 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 will now comment on the report with a view to adopting it.

- **Report from EDPS**

- Emergency prior consultation opinion – concept of personal data

The EDPS provided information about the request for prior consultation according to the emergency procedure provided for in Article 39(3) Europol Regulation. The request concerned a tool allowing Europol to retrieve public data about the transactions happening on blockchain to make that information available to national law enforcement authorities to be used in the context of their own investigation and mentioned Europol's concerns about the qualification of that data as 'personal' following the decision in the SRB case. The EDPS explained the reasons why the request did not meet the requirements for a prior consultation and mentioned the points included in its response to Europol.

- Europol's participation to ETIAS and anticipated challenges

The EDPS provided information about the processing taking place when Europol is consulted on a hit between an ETIAS application and data in the systems maintained by Europol and recalled the obligation to send all the responses via the ETIAS software.

- AP Portfolio

The EDPS presented the different APs, i.e. the thematic areas in which the analytic capabilities of Europol are divided and reported that documents exist to define the type of information and data which can be processed for each analysis. The EDPS clarified that the Member States are not directly involved in the analysis, which is conducted by Europol analysts, but provide the data to be analysed. The EDPS further noted that the scope of the APs is being progressively changed and the existing safeguards are becoming increasingly obsolete. The CSC members raised concerns about the implementation of the purpose limitation principle.

– Topics of interest for next meeting

A Working Group for police and judicial cooperation was established in particular to assess the information provided by the EDPS Prior consultation Opinions and identify points of common interest. The CSC members were invited to express their interest in participating in the Working Group. The topic of police and judicial cooperation will be further discussed during the upcoming CSC meetings.

– AOB

The EDPS provided information about the European Police Records Index System (EPRIS) under the Prüm II Regulation, whose purpose is to identify whether a person is included in the police records of another Member State, and explained that the Member States are joint controllers. The CSC members will now prepare for coordination on possible consultations.