

Final

22nd meeting of the Coordinated Supervision Committee

17 and 18 February 2026, Remote meeting

Summary

The Coordinated Supervision Committee ('the Committee' or 'the CSC') met on 17 and 18 February 2026, remotely.

General part

- **Elections of new Deputy Coordinator**

The Coordinator announced the upcoming end of the mandate of Matej Sironic, one of two Deputy Coordinators, in March 2026 and the election of a new Deputy Coordinator during this meeting to ensure business continuity.

Ms. Renée ter Hart, from the Dutch DPA, was elected as new Deputy Coordinator of the CSC. Her mandate will take effect as of the expiry of the mandate of the current Deputy Coordinator.

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.

Annual reports of the CSC

The CSC members discussed the organisational aspects in relation to the Committee's obligation to report periodically with regard to the activities conducted in respect of the coordinated supervision over the EU large-scale IT systems.

Annual report of SIS statistics

- **Exchange of views with COM about the reporting template**

Note: This part of the minutes has been validated by the colleagues of the European Commission

The Coordinator recalled that during the previous meeting of the Committee the draft SIS Statistics report for 2024, which incorporates the information provided by the national competent authorities, had been presented and that it had been agreed to contact the Commission to address the concerns

raised regarding the reporting template and the interpretation of the information, which should be provided therein.

The Commission provided an explanation concerning the reasons the data collection requirement was included in the SIS Regulations, highlighting the need to have an overview of the functioning remedies and a standard statistical system providing annual reports, to facilitate checking on the use of recourse in Member States.

Regarding the question on whether the reporting template is transmitted directly to the SA of each Member State or is first routed to a national competent authority to populate statistical data, the Commission explained that the reporting template is established by the [Commission Implementing Decision \(EU\) 2022/2206](#) and it is not transferred to a specific authority, rather there is an obligation for the Member States to use the template for reporting statistics based on the SIS Regulations [Regulations (EU) 2018/1861 and (EU) 2018/1862].

With respect to the question on whether the SAs are responsible for retrieving and submitting figures from the national competent authority or the competent authority handles the final submission directly, the Commission stated that these authorities need to coordinate at national level and ensure that there are internal procedures enabling the registration of the statistics in the format of the template and reporting to the EDPB in a timely manner.

With regard to court proceedings initiated by data subjects under Articles 78 and 79 GDPR, the Commission clarified that all court cases concerning the exercise of SIS data subjects' requests under the Regulations (EU) 2018/1860, (EU) 2018/1861 and (EU) 2018/1862, including judicial remedies against decisions of the data protection authorities on indirect access request or complaints, should be reported.

Concerning the anonymization and mitigation strategies which should be applied to manage the risk of re-identification when reporting small sample sizes or rare cases, one CSC member suggested creating "buckets" and noting that a minimum number of requests had been received or do not require input in order to prevent such disclosure.

Regarding the specific criteria for including certain requests (for information or for deletion) in the report, particularly when applicants mistakenly contact the supervisory authority due to confusion over direct versus indirect access rights, the Commission suggested that the requests not submitted in line with the national requirements, for which no further steps were taken in the process, should not be considered as valid requests and thus should not be reported. The Commission also suggested that requests not addressed to the competent authority and transferred to the competent authority should be considered as if the request was submitted to that authority.

With respect to the way in which the template accommodates the specific reporting requirements of federal states with decentralized management structures and the trade-offs between the expenditure and benefits of the statistics that are considered possible by the Commission, the latter explained that this differs among the Member States, which should establish how the data are collected.

With regard to the distinguishment between zero values, missing data and non-applicable fields to ensure statistical accuracy and support the actual data entry into the template, the Commission recommended leaving a field blank in cases in which it is not possible to report but a legal obligation for reporting exists, since reporting with “0” has a meaning.

Concerning the mechanism to provide contextual comments, the Commission proposed to include the reasons why certain fields are left blank in the cover email.

The Commission then announced that the overall evaluation of the SIS Recast is scheduled for 2026-2027 and includes the data subject access rights. At present, there are no plans to issue additional guidance or examples on the reporting categories across Member States.

The Commission also clarified that the template does not contain any category of general data protection complaints that incidentally concern SIS data but only the cases related to the exercise of data subject rights under Articles 53–55 Regulation (EU) 2018/1861 and Articles 67–69 Regulation (EU) 2018/1862 should be reported.

Finally, the Commission explained that an access request is not considered valid and should not be calculated in the statistics in cases where the applicant fails to respond to a subsequent mandatory request for identity document validation. However, the Commission recommended reporting such requests to enable the assessment of the overall situation.

SIS

- **Presentation of eu-LISA - SIS Statistics overview of data stored in SIS and discussion**

The eu-LISA representative presented the operation status of the SIS and provided an overview of the data stored in SIS, including the alerts stored in the Central system and statistics on the total searches, biometric searches as well as Automated Fingerprint Identification System ('AFIS')/ Fast-Print Searches ('FPS') queries and hits reported on foreign alerts.

A discussion followed on specific categories of alerts and the technical modalities for the performance of the fast print and common print searches by Frontex.

VIS

- **Presentation of eu-LISA - Statistics overview of and discussion**

The eu-LISA representative presented the operation status of VIS and provided an overview of the operations, including statistics on the VIS usage, the operations per VIS channel and the status of applications and visas from November until December 2025. The eu-LISA representative then presented the business analysis aspects for the same reporting period.

A discussion followed and the eu-LISA representative explained the link between the VIS and the SBMS repository, to which an image is sent after being stored in the VIS. Several kinds of potential technical errors were also mentioned.

A presentation of the VIS statistics overview will take place during the CSC meeting of 8-9 September 2026, following the full entry into operation of the EES.

- **Annual report: topics of interest for the CSC (for discussion)**

It was recalled that the joint report of activities regarding the coordinated supervision over the VIS shall be issued in 2027. A discussion on topics of interest for the Committee followed. The CSC members agreed to develop and provide guidance on the data subject rights in VIS.

EES

- **Discussion/brainstorm on Data Subject Rights under the EESR**

The rapporteur recalled that the EES entered into force on 12 October 2025 and would be fully operational in all Schengen states on 10 April 2026 and that it had been agreed to develop a guide on data subject rights in EES. To that end, the rapporteur presented the envisaged structure and content of this guide. A discussion followed and the CSC members shared their experience on any requests, questions and/or complaints already received from data subjects at national level. The CSC members will now share their views on the need 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.

- **Information campaign update**

It was recalled that joint comments from the CSC members and the EDPS had been sent to the Commission on the EES information campaign, including the information materials to raise awareness among travellers, the first wave of which was launched on 15 September 2025. It was also recalled that the Commission had communicated its intention to incorporate most of the comments in view of adapting the information campaign and the EES website.

The rapporteur then reported that the Commission had shared the updated documents inviting the CSC members and the EDPS to send any final remarks in view of the second wave of the campaign. The CSC members will now review and comment on the updated information materials.

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. A discussion will take place during the following meeting of the Committee.