

FAQs about Specific Actions under the Thematic Facility Work Programmes 2023-2027 for the AMIF, BMVI, ISF

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❖ **BMVI/2026/SA/1.5.2 - “Support to Member States to enhance their biometric capabilities in relation to the Schengen Information System (SIS)**

no	Topic classification	Question	Reply
1.	Indicators	<p>It appears that, unlike other top-up specific actions, there is no explicit reference to the project’s contribution to output and result indicators. While this specific action is understood to support Member States in implementing certain ‘obligatory’ activities and considering that a number of projects already target the same systems, the absence of such references is logical.</p> <p>Notwithstanding this, the MA would be grateful for an explicit confirmation from DG HOME, that such Specific Action is not expected to target output and result indicators, particularly if it can be evident that such SA will enhance currently implemented projects aimed at investments of the SIS.</p>	<p>All projects under shared management are to be monitored in accordance with Title IV of Regulation (EU) 2021/1060.</p> <p>Monitoring and reporting on implementation of this specific action is required, in accordance with Article 30 of the BMVI Regulation, (EU) 2021/1148, using the indicators and codes of intervention as set out.</p> <p>The indicators to be used are output indicator O.1.10 (number of IT functionalities developed/maintained/upgraded) and, where appropriate, result indicator R.1.19 (number of participants who report three months after a training activity that they are using the skills and competences acquired during that training activity) in Annex VIII to that Regulation.</p>
2.	Clarification of sub-actions	<p>Pages 3-4 state that sub-action 1 concerns searches in the SIS using fingerprints captured in the EES and sub-action 2 concerns EES face-capturing devices to direct queries to the SIS whereas page 5 presents the opposite (facial images for sub-action 1 and fingerprint data for sub-action 2). Can you clarify?</p>	<p>Please refer to the numbering of the sub-actions in pages 4- 5 of the call document.</p>
3.	Eligibility	<p>Although Cyprus currently is not using EES, Cyprus is in the process of developing a national EES, with</p>	

		<p>the view to use it, as soon as Cyprus joins Schengen area. It should be noted that the new national EES will enter into operation and replace the existing national arrival/departure system, irrespective of Cyprus time of entry into the Schengen area.</p> <p>The implementation of the EES in Cyprus includes, in addition to the software, the procurement of the necessary equipment (ABC Gates, SSS Kiosks, cameras, fingerprint and document readers) is foreseen, including camera towers which will be installed at each booth at all border crossing points (BCPs), i.e. airports, ports and marinas, for the purpose of capturing the facial image of third-country nationals (TCNs) during control and registration upon entry/exit from the country. In the future, the same cameras will also be used for capturing the facial image and searching in the SIS AFIS, through the national EES, in compliance with European and national legislation.</p> <p>In the call for expression of interest under the Specific Action it is stated that:</p> <p>3.3. Scope and purpose of the specific action – The specific action targets in particular: – the purchase of hardware (e.g. face-capture devices), software development and integration, and licences to be deployed at the border crossing points, adaptations to national IT solutions, including software, performing proof(s) of concept(s), and redefinition of workflows and processes at the borders.</p>	
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4.	Scope – Sub-action 1 (SIS AFIS and EES fingerprints)	<i>Use of existing EES fingerprints:</i> Can the adaptation of the national SIS AFIS focus exclusively on reusing fingerprints captured during standard EES registration workflows, without introducing additional fingerprint capture steps at border crossing points, provided that SIS search requirements are met?	Yes.
5.		<i>Degree of technical adaptation expected:</i> Is it acceptable for Member States with a centralised SIS AFIS and EES architecture to focus mainly on software adaptations (interfaces, message flows, configuration) rather than substantial changes to core AFIS components?	Yes, the specific action may support mainly software adaptations.

6.	Scope – Sub-action 2 (Face capture and SIS queries)	<i>Adaptation vs. replacement of face-capturing devices:</i> How does the Commission distinguish between “adaptation” of existing EES face-capturing devices and the procurement of new equipment? In particular, are software upgrades, firmware updates, or integration modules for existing devices considered sufficient under Sub-action 2? Where existing devices cannot be technically adapted, would the procurement of replacement face-capturing devices be eligible?	The specific action aims to support the adaptation or further development of devices that enable searches in the SIS using biometrics captured at border checks during standard EES registration workflows. The eligibility of the envisaged upgrades/developments/replacements needs to be assessed against the specific action objective. Depending on the national implementation, if adaptations are not technically feasible to achieve the objective of the specific action, the purchase of equipment could be eligible.
7.		<i>Readiness for future SIS facial search and sBMS:</i> Can Sub-action 2 include preparatory technical adaptations aimed at ensuring readiness for SIS facial image searches and sBMS-related functionalities, even if large-scale operational facial searches in SIS are foreseen at a later stage (notably from 2028)? In this context, Member States note that detailed technical specifications for SIS facial image searches (including search interfaces, message flows, integration patterns and image quality requirements such as ICAO standards, minimum resolution and capture conditions) are not yet fully available. Could the Commission confirm that this uncertainty regarding forthcoming technical specifications is acknowledged when assessing the scope and dimensioning of Sub-action 2 activities, and that adaptations carried out under this specific action will be considered eligible even where they may need to be further refined once the relevant technical documentation becomes available?	Yes, such adaptations will be considered eligible in accordance with the objectives of the call and further refinements to the activities financed under the specific action could be made at a later stage.
8.		<i>Limited-scale deployments:</i> For Member States with a limited number of external border crossing points, is it acceptable to focus Sub-action 2 only on specific locations (e.g. main international airport), provided that national operational coverage is ensured and that	Yes.

		the adaptations are technically scalable to other border crossing points if needed?	
9.	Cost eligibility	<i>Software licences and multi-year vendor support:</i> Could costs related to software licences and vendor-led system adaptation, configuration and integration services be eligible under both sub-actions – including multi-year vendor support and maintenance contracts directly linked to SIS biometric search functionality – covering the full envisaged implementation period?	Yes, provided that these cost support achievement of the objectives identified under the sub-actions concerned.
10.		<i>Equipment-related costs:</i> Can peripheral equipment (e.g. cameras or biometric components directly linked to face capture) be included under eligible costs, provided that it is clearly justified as a necessary adaptation to existing EES infrastructure and is strictly necessary to enable SIS biometric search functionalities?	Yes, if strictly necessary to enable SIS biometric search functionalities.
11.	Complementarity	What level of detail is expected when describing complementarity with existing national BMVI-funded SIS or EES projects? In particular, is a brief textual reference to the relevant programme actions sufficient, or are project identifiers and indicative financial figures expected? Where the proposed adaptations enable new biometric search functionalities in SIS that were not covered by previous funding, is it sufficient to demonstrate this functional difference, even if the underlying systems were initially financed under earlier BMVI actions?	Applications are expected to give a concise explanation of how the envisaged actions complement those previously financed and do not overlap with them (i.e. not concerning the building of the SIS AFIS but providing new functionalities). Reference to the projects concerned would give useful examples.
12.	Implementation timeframe	Would an indicative implementation timeframe of approximately 18–24 months be considered appropriate, particularly where phased or incremental deployments are planned (for example starting with fingerprint-based SIS searches under Sub-action 1, followed by facial image adaptations under Sub-action	An implementation timeframe of 18 to 24 months may be appropriate for this specific action, to the extent that it will respect the deadline for eligibility of expenditure set out in Article 63(2) of the Common Provisions Regulation, (EU) 2021/1060. Please note that this is not an ex-ante opinion on a potential application: this

		2), provided that both sub-actions are covered within the project lifecycle?	aspect can only be assessed during the evaluation of the submitted applications.
13.	Procedural aspects	<i>Level of technical detail:</i> Given the simplified application procedure, what level of technical detail is expected in the description of system architectures and workflows for the assessment to be considered sufficient? In particular, is a high-level functional description of national SIS, EES and AFIS interfaces and data flows sufficient, or are detailed technical specifications expected at the application stage?	Applications are expected to provide a clear description of the system architectures and workflows. Detailed technical specifications are not necessary.
14.		<i>Focus on national context:</i> For smaller Schengen-associated countries with centralised systems and a limited number of external border crossing points, is it acceptable to emphasise quality, consistency and interoperability of biometric checks across all border crossing points, rather than the scale or volume of deployments, when justifying the proposed activities and expected results?	Yes.
15.	Use of framework contract	Is it possible to make use of an existing Framework Contract concluded with a supplier working on the Schengen information system?	<p>Depending on the circumstances and needs, a contracting authority may sign a framework contract (FWC) with one or several companies for tenders requiring recurring purchases. As a general rule, a FWC does not create an obligation but a possibility to use it for purchases of goods/services covered by the FWC.</p> <p>Member States may make use of existing FWCs, provided that they comply with the applicable EU and national public procurement rules. In particular, FWCs should avoid vendor lock-in, a situation in which a public organisation is tied to a specific provider due to proprietary technologies, standards, or contracts that make it difficult or costly to switch.</p>

