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# COMMISSION STAFF WORKING DOCUMENT

# EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT REPORT

*Accompanying the document*

**Proposal for a**
**REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

**on the digitalisation of case management in the area of return, readmission and reintegration, and amending Regulations (EU) 2018/1726, (EU) 2018/1860, (EU) 2019/817 and (EU) 2019/818 of the European Parliament and of the Council**

{COM(2026) 1037 final} - {SEC(2026) 1037 final} - {SWD(2026) 1037 final} - {SWD(2026) 1038 final}

## 1. INTRODUCTION: POLITICAL AND LEGAL CONTEXT

The Commission plans to digitalise case management in the area of return, readmission and reintegration, as a first step to build a comprehensive migration system that manages migration in the long term, including the effective return of third country nationals who have no right to stay in the European Union, and ensure the proper functioning and sustainability of the European migration and asylum system.

Digitalisation is explicitly identified in the Pact on Asylum and Migration as an enabler for swift and efficient migration procedures ([1]). Digital systems are essential to improve operational cooperation, ensure reliable data collection, reduce administrative burden, and strengthen the monitoring and enforcement of EU migration rules. This objective aligns with the broader EU political ambition to develop European digital solutions that simplify procedures while safeguarding fundamental rights and data protection.

The need for digitalisation of case management in the area of return, readmission and reintegration has been underlined in the Political Guidelines of President von der Leyen (2024-2029) ([2]), the Commission Work Programmes for 2025 and 2026, which explicitly present the initiative as having a strong simplification dimension ([3]), and the European Asylum and Migration Management Strategy ([4]). The Return Regulation ([5]) started to translate this ambition into legislation by establishing a common EU return system allowing for the enhanced sharing and transfer of data, in compliance with data protection rules.

To support its work on the legislative proposal on digitalisation, in 2024 the Commission commissioned an external study ('the Digitalisation Study') ([6]). The Digitalisation Study was supported by extensive consultations with all Member States, EU agencies and key stakeholders through surveys, interviews and dedicated workshops and confirmed that, despite significant investments, the digital landscape for return-related case management remains fragmented, with uneven development, wide differences in availability of data, functionality and interoperability, and limited data sharing.

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([1]) The Pact on Migration and Asylum was published in the Official Journal of the EU, L series, on 22 May 2024. For detailed legislative acts, see Official Journal L series daily view - EUR-Lex (europa.eu).

([2]) Ursula von der Leyen, Political Guidelines for the Next European Commission 2024–2029, Strasbourg, 18 July 2024; e6cd4328-673c-4e7a-8683-f63ffb2cf648_en (europa.eu).

([3]) COM (2025) 45 final, 11 February 2025; COM(2025) 870 final; 21 October 2025.

([4]) COM(2026) 45 final, 26 January 2026.

([5]) Regulation (EU) 2026/2280 of the European Parliament and of the Council of 7 October 2026 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 of the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC (OJ L, 2026/2280, 15.10.2026, ELI: http://data.europa.eu/eli/reg/2026/2280/oj).

([6]) Study on the way towards a comprehensive, integrated and digitalised EU migration management system, HOME-AMIF-TF2-FW-EVA1-4010, ISBN 978-92-68-37351-4; DOI 10.2837/8436041, with Annexes (ISBN 978-92-68-42383-7; DOI 10.2837/0124908); https://data.europa.eu/doi/10.2837/8436041; https://data.europa.eu/doi/10.2837/0124908.

## 2. PROBLEM DEFINITION

**First**, **the information needed** to carry out efficiently return, readmission and reintegration processes **is not easily accessible to all relevant authorities**. The available data necessary to swiftly complete these processes is not sufficiently shared and accessible (i) within the same Member State, (ii) between Member States (and between Member States and Frontex), and (iii) between Member States (or Frontex) and third countries. **Second**, migration authorities are suffering from **excessive administrative burden. Third**, **more granular and swiftly available statistics on return, readmission and reintegration are needed**. These problems are caused by **three main problem drivers**: (i) the **digitalisation of** return, readmission and reintegration processes **remains insufficient and fragmented across the EU**. National return systems – even if often built on Frontex template - vary widely in availability, functionality, and interoperability, and are often disconnected from existing EU tools for readmission and reintegration. **Governance is similarly fragmented**, with responsibilities divided across Member States, EU agencies, and third-country partners, leading to inconsistent standards, complex data protection arrangements, and dependence on external funding and cooperation; (ii) even when digital case management systems are in place and integrated, the **functionalities of these systems are often inadequate**. Key features such as adjusting deadlines, or automatic follow-up of return decisions are rarely implemented. Technical limitations, such as the lack of connection to Schengen Information System or a single identifier, can lead to duplicate cases and unreliable statistics; and (iii) **lack of sufficiently clear legal bases for the sharing of data and development of IT systems** restricts the use of existing IT systems and prevents the development of new systems.

## 3. WHY SHOULD THE EU ACT?

**Article 79(2)(c) of the Treaty on the Functioning of the European Union** mandates the European Parliament and the Council to adopt measures in the area of illegal immigration and unauthorised residence, including removal and repatriation of persons residing without authorisation. The development and implementation of digital case management systems in the area of return, readmission and reintegration is a means to this end. Without EU coordination, Member States will **continue developing siloed systems**, leading to inefficiencies. An EU-level intervention is essential to ensure **interconnection of relevant IT systems across Member States**, consistent data exchange, and operational efficiency across Member States.

## 4. WHAT SHOULD BE ACHIEVED?

The general objectives are to **support the implementation of the rules on** return, readmission and reintegration laid down in the Return Regulation and contribute to the implementation of the **Pact on Migration and Asylum**. In the long-term, this would be the **first step towards a comprehensive, integrated and digitalised EU migration management system**, that would go beyond return, readmission and reintegration processes and encompass other migration processes such as asylum.

Specifically, the initiative aims to (i) **enhance data sharing** between competent authorities, in compliance with data protection rules, to ensure that the information necessary to carry out and monitor return, readmission and reintegration processes is

available, (ii) **further the digitalisation of these processes and remedy the limited functionalities of existing IT systems** to ensure that processes and reporting requirements are more digitalised, simplified, and more automated, and to significantly **decrease the administrative burden and workload of national authorities** and (iii) improve data collection to enable the **automated creation of more accurate and granular statistics and their timely availability**.

## 5. WHAT ARE THE AVAILABLE POLICY OPTIONS?

Beyond the baseline scenario, the three options identified would achieve **full digitalisation of case management in the area of return, readmission and reintegration**, by providing the following common features: (i) obligation for Member States to make use of an integrated digitalised case management system on these processes; (ii) interaction and connection with existing and future EU Information Systems; (iii) building EU integrated case management systems for readmission (iRCMS) and reintegration (RIAT) at EU level ; (iv) automation of processes; and (v) opening the way for a comprehensive, integrated and digitalised EU migration management system to which additional migration processes could later be added (e.g. screening, asylum).

### 5.1. Policy option 1 'Partially decentralised option without central database'

Under Option 1, the case management system **for return** is developed at **national level ('national RECAMAS').** To ensure harmonisation and with the support of Frontex, national RECAMAS will be based on either (i) the RECAMAS Model developed by Frontex or (ii) an off-the-shelf RECAMAS-based IT system developed by Frontex, in cooperation with eu-LISA, that may be adopted and customised by willing Member States ('Frontex RECAMAS'). The EU integrated case management systems **for readmission (iRCMS) and reintegration (RIAT)** are developed at **EU level** and integrated in the national RECAMAS. Case management systems **leverage existing and future EU Information Systems (e.g. SIS, Eurodac**, EES, VIS), making full use of the European Search Portal. **No new EU central database on return is created**. A **Communication Portal** is used for the communication of additional information that cannot be shared through EU Information Systems. By building on existing digital systems, Option 1 will **minimise the number of implementing and delegated acts needed** for the development of the systems.

### 5.2. Policy option 2 'Partially decentralised option with central database'

Just as in Option 1, the case management system **for return** is developed at **national level based on the RECAMAS Model,** while the systems **for readmission (iRCMS) and reintegration (RIAT)** are developed at **EU level** and integrated in the national RECAMAS. Contrary to Option 1, an **EU central database dedicated to return, readmission and reintegration is created** to facilitate the sharing of additional information that cannot be shared through EU Information Systems.

### 5.3. Policy option 3 'Centralised solution'

**Unlike Option 1 and 2, a single case management system is developed at EU level for return, readmission and reintegration**. This single case management system replaces all national case management systems and integrates the functionalities of iRCMS and RIAT.

The automatic sharing of relevant data is enabled through the creation of a **dedicated EU central database on return, readmission and reintegration**.

## 6. WHAT ARE THE IMPACTS OF THE POLICY OPTIONS?

Under the **baseline scenario**, the **problems identified will continue to persist**. In terms of efficiency, the baseline scenario is very low concerning the costs incurred but overall, not efficient in relation to the objectives to be achieved.

**Option 1** is expected to achieve the objectives pursued effectively in the **short term to medium term** (i.e. six years to become operational from the adoption of the Commission proposal until the go-live). It **builds on existing Member State systems and leverages existing systems at EU level on readmission and reintegration**. Option 1 improves the coherence of digital management of return, readmission and reintegration processes. It benefits from EU Information Systems for information sharing and the interoperability infrastructure. Total costs across Member States, Frontex, eu-LISA and the Commission are estimated to range between EUR 582 and 753 million (considering two years of one-off development and six years of ongoing maintenance and support).

**Option 2** is expected to achieve the objectives pursued but only in the **medium to long term** (i.e. eight years to become operational from the adoption of the Commission proposal until the go-live). The **added value of a new EU central database is limited as it would mostly replicate data already stored in other EU Information Systems** (e.g. SIS or Eurodac). Total costs for this policy option across Member States, Frontex, eu-LISA and the Commission are estimated to range between EUR 700 and 891 million (considering three years of one-off development and six years of ongoing maintenance and support).

**Option 3** is expected to achieve the objectives pursued but only in the **medium to long term** (i.e. seven years to become operational from adoption of the Commission proposal until the go-live). Establishing a single EU case management system to accommodate the multiple differences in national return procedures would be **challenging due to diverse practices and legal frameworks**. As under Option 2, the **added value of a new EU central database is limited**. Total costs for this policy option across Member States, Frontex, eu-LISA and the Commission are estimated to range between EUR 226 and 288 million (considering two-and-a-half years of one-off development and six years of ongoing maintenance and support). While this appears to be the cheapest option, it would incur **very high 'sunk costs',** estimated to range between EUR 689 and 877 million for seven years for 27 Member States, as national and EU systems would have to be maintained until the new EU system is operational, before being entirely phased out.

## 7. HOW DO THE OPTIONS COMPARE?

| Criteria | Weight | Baseline | PO1 | PO2 | PO3 |
|---|---|---|---|---|---|
| ***Evaluation of effects*** | | | | | |
| Effectiveness | 4 | 0 | 4 | 2 | 2 |
| Efficiency | 3 | 0 | 3 | 2 | 1 |
| Coherence | 2 | 0 | 2 | 3 | 3 |
| ***Types of impacts*** | | | | | |
| Economy | 2 | 0 | 0 | 0 | 0 |
| Society | 2 | 0 | 1 | 1 | 1 |
| Environment | 1 | 0 | 0 | 0 | 0 |
| Security | 5 | 0 | 4 | 3 | 3 |
| Fundamental rights | 3 | 0 | 0 | -1 | -1 |

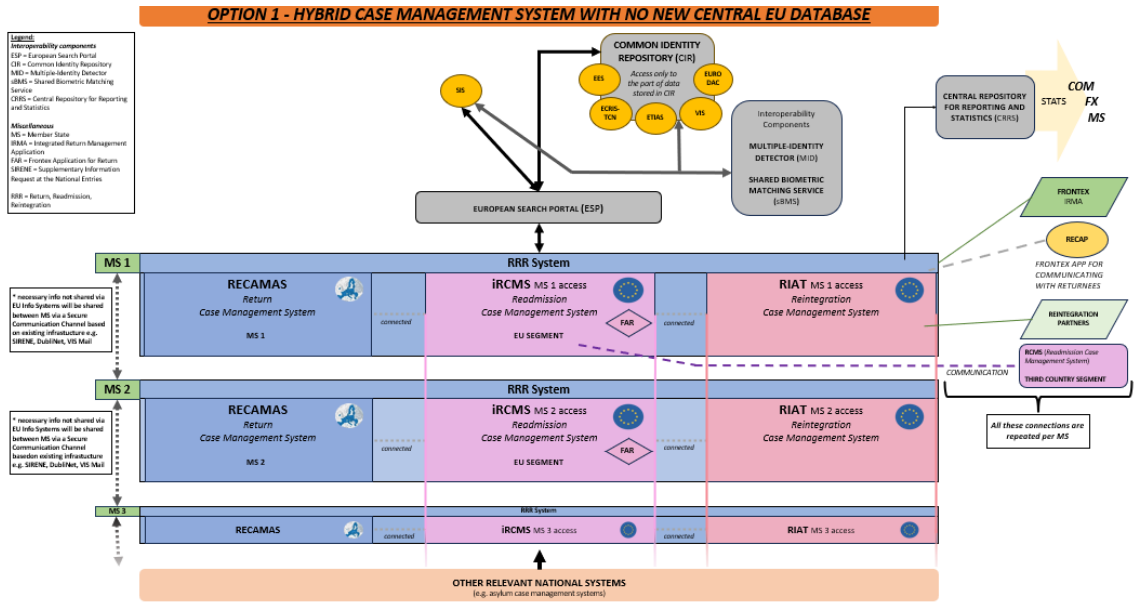
| Criteria | Weight | Baseline | PO1 | PO2 | PO3 |
|---|---|---|---|---|---|
| Feasibility | 4 | 0 | 4 | 2 | -2 |
| ***Total*** | | **0** | ***67*** | ***42*** | ***23*** |

## 8. WHAT IS THE PREFERRED POLICY OPTION?

**Option 1 'Partially decentralised option without central database'** is the preferred choice due to its comparatively faster deployment, cost-effectiveness, and flexibility. It leverages existing EU and Member State infrastructures, **avoiding delays and duplication of data associated with the development of a new central database**.

The initiative will translate in a **significant reduction of administrative burden and workload for national authorities.** By integrating separate digital systems and automating many processes (e.g. the creation of return alerts), it will allow substantial efficiency gains and savings. For instance, it is estimated that it could take approximately 30 minutes to create manually a return alert and upload it into the SIS ([7]). Given that there were 464 985 return decisions in the EU in 2024 ([8]), this amounts to 29 062 working days ([9]) for a total cost of €7 788 499 ([10]), which will be significantly reduced thanks to increased automation. In addition, sunk costs are considered negligible under this option.

*Infographic for Option 1: 'Partially decentralised option without central database'*




## 9. HOW WILL ACTUAL IMPACTS BE MONITORED AND EVALUATED?

Monitoring data and indicators will be collected and should also capture reductions in administrative burden (e.g. time saving in reporting and case transfer process). Data should ideally be collected in real time and in automated manner. This data will inform the

([7]) Bilateral meetings conducted with national competent authorities in 2025.

([8]) Eurostat, [migr_eiord] Third country nationals ordered to leave - annual data (rounded).

([9]) Counting 8h per working day.

([10]) Based on the average hourly labour cost in 2024 i.e. €33.5: EU hourly labour costs ranged from €11 to €55 in 2024 - News articles - Eurostat.

Commission after the start of operations. AI analytics could also contribute to monitoring and evaluation by identifying patterns in return, readmission and reintegration processes. The monitoring of the application of the new rules will also be done through the Schengen Evaluation Monitoring Mechanism ([11]).

([11]) Council Regulation (EU) 2022/922 of 9 June 2022 on the establishment and operation of an evaluation and monitoring mechanism to verify the application of the Schengen acquis, and repealing Regulation (EU) No 1053/2013.