

Our ref: STRAT/SGT/PAD-2026-00171
Please quote when replying.

Mr/Ms Frey Lindsay
Email: frey@statewatch.org

Warsaw, 15 June 2026

Your application for access to European Border and Coast Guard Agency (Frontex) documents

Dear Mr/Ms Lindsay,

In reference to your application registered on 12 May 2026, for which the time limit has been extended by 15 working days on 2 June 2026¹, asking for access to:

As clarified by you:

In accordance with Regulation (EU) 1049/2001, I am requesting access to documents related to the development (all phases) of the RECAP digital information tool, held by Frontex between 26 April 2025 and 26 April 2026.

Specifically I am requesting:

- *Internal or external presentations on the development and intended functions of the tool;*
- *Impact assessments;*
- *Cost estimates or procurement contracts related to the development of the tool;*
- *Any feasibility studies.*

Please be informed that Frontex has identified eight documents, seven of which are herewith attached. The remaining document is publicly available at <https://data.consilium.europa.eu/doc/document/WK-2309-2026-INIT/en/pdf> (pages 24 and 25 in scope of your request).

With regard to the seven documents herewith attached, please note that limited parts of these documents fall out of scope of your request or fall under exceptions under Article 4 of Regulation (EC) No 1049/2001 and therefore had to be expunged since they contain:

- detailed, sensitive information obtained in cooperation with a Member State of the European Union regarding the effectiveness of border security measures. The disclosure of such information by itself but especially in combination with other sources would reveal information on the current situation regarding border security measures applied, which could be exploited by criminal networks involved in migrant smuggling, trafficking in

¹ In accordance with Article 7(3) of Regulation (EC) No 1049/2001 of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43).

human beings and thus undermine the protection of the public interest as regards public security as laid down in Article 4(1)(a) first indent of Regulation (EC) 1049/2001.

- detailed information regarding the modus operandi of European Border Guards and competent national law enforcement authorities performing return and return-related activities. Disclosing such information would expose the working methods used in ongoing and future operations, putting at risk the efforts made by the European Union and its Member States to return third-country nationals who are subject to national return decisions. This would endanger the public order as well as Member States' security and, concretely, jeopardize the orderly conduct of return flights as well pose a hazard to the safety of aircraft, passengers and crew. In this light, the disclosure of such information by itself but especially in combination with other sources would undermine the protection of the public interest as regards public security as laid down in Article 4(1)(a) first indent of Regulation (EC) No 1049/2001 and therefore must be refused.
- information, access to which must be refused pursuant to Article 4(3) of Regulation (EC) No 1049/2001 as its disclosure would seriously undermine internal decision-making processes regarding current and future activities of Frontex. The ongoing discussions taking place within Frontex and under its auspices and involving numerous stakeholders rely upon a protected space for internal consultation and deliberation. Namely, disclosing these elements would enable third parties to draw preliminary conclusions and to exert undue influence upon the participants, thereby hampering the candour and integrity of the decision-making process. No overriding public interest that is objective and general in nature and not indistinguishable from individual or private interests for the release of these documents is ascertainable in the present case.

Please note that the expunged information in the publicly available document (page 25) pertains to detailed information regarding the modus operandi of European Border Guards and competent national law enforcement authorities performing return and return-related activities, as explained above.

Subject to any intellectual property rights of third parties, the documents may be reused provided that the source is acknowledged and that the original meaning or message of the documents is not distorted. Frontex is not liable for any consequence resulting from the reuse of these documents.

Pursuant to Article 7(2) of Regulation (EC) No 1049/2001, within 15 working days of the receipt of this reply, you may submit a confirmatory application.

A confirmatory application, indicating the reference of your initial application, may be submitted electronically to: <https://pad.frontex.europa.eu/padrequests/create>,

by mail to: European Border and Coast Guard Agency, Public Access to Documents Team,
pl. Europejski 6, 00-844 Warsaw/Poland

or by email to: pad@frontex.europa.eu or frontex@frontex.europa.eu.

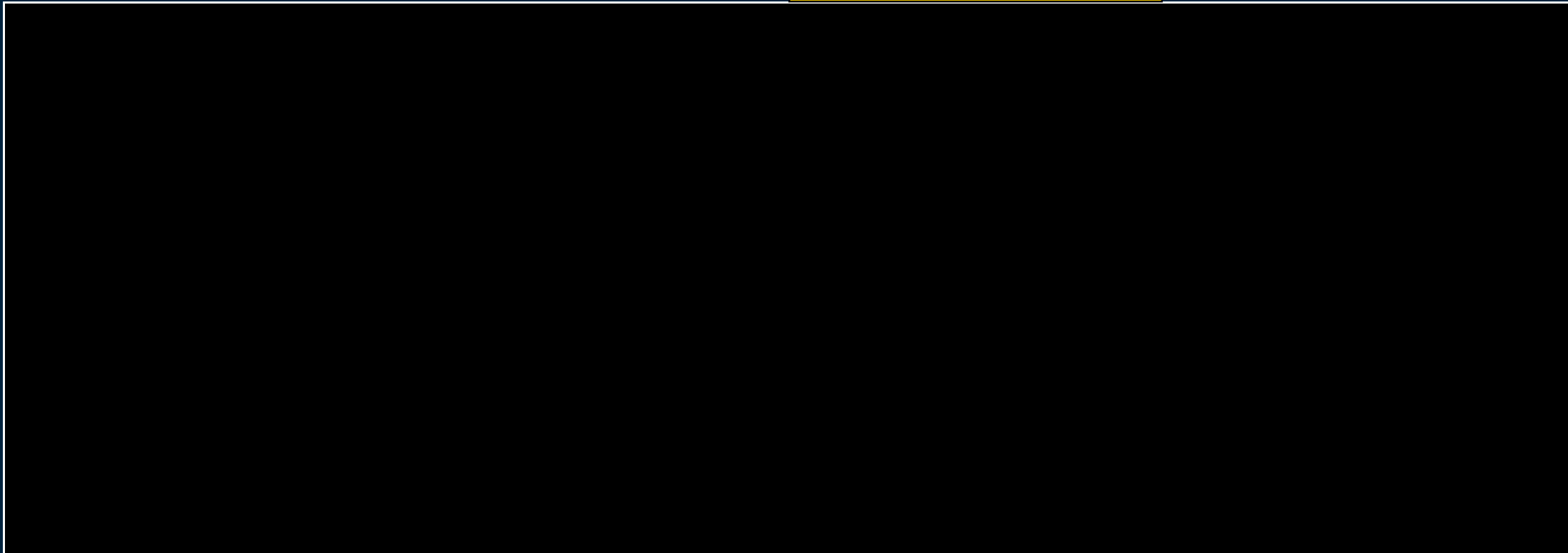
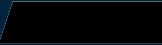
Based on Article 8 of Regulation (EC) No 1049/2001, Frontex will reply within 15 working days from the registration of such application.

Yours sincerely,

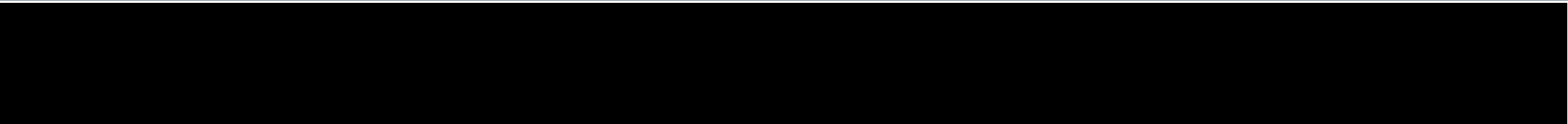
[Decision signed electronically]
Public Access to Documents Coordinator

AGENDA

The redacted parts are out of scope unless indicated otherwise. The rest of the document is out of scope.



15:00 – 15:30 [discussion point]
RECAPP (Return and Reintegration application): next steps and involvement of MS



AGENDA TOPIC

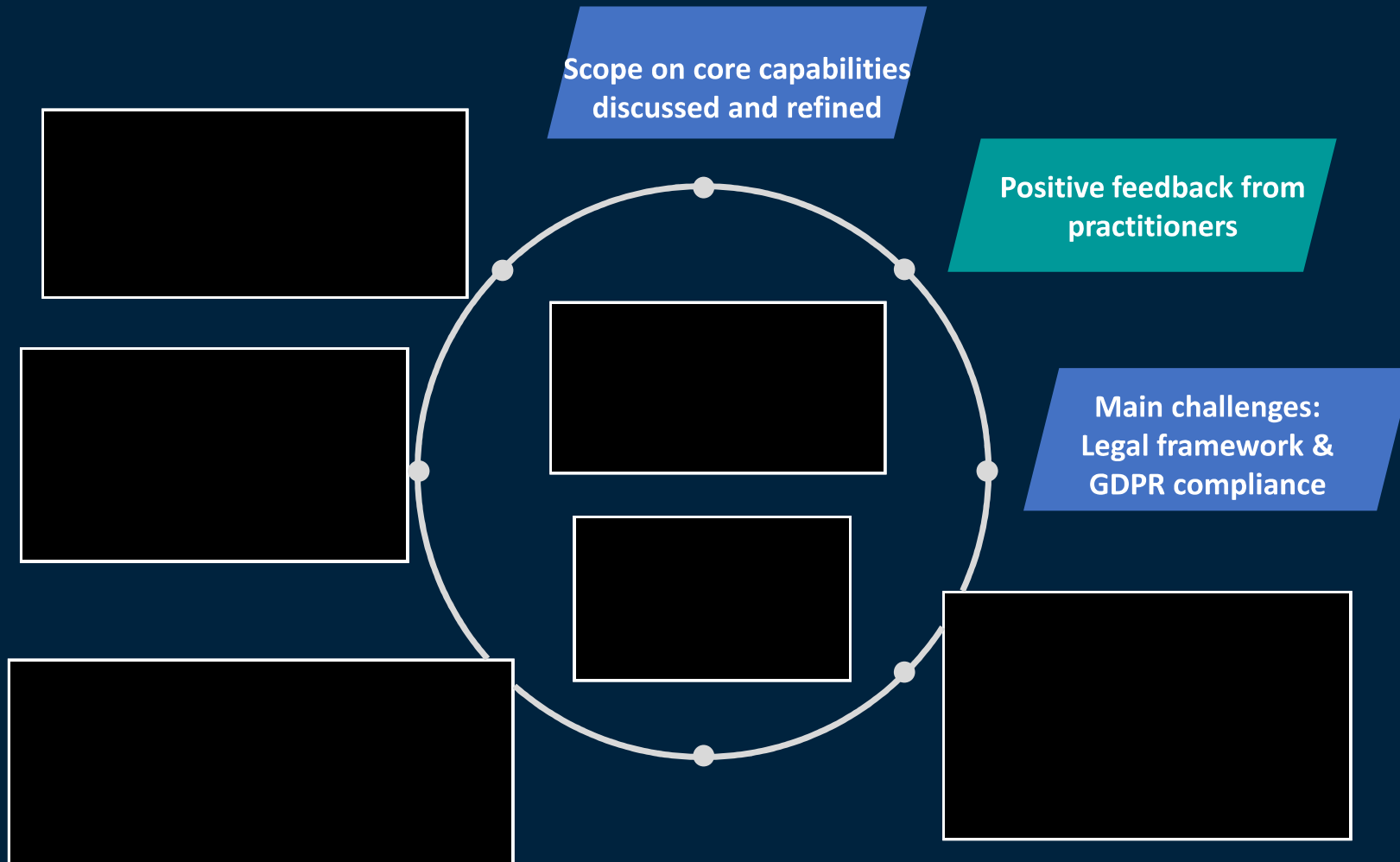
**RECAPP (RECAMAS application):
next steps and involvement of MS**

Mobile RECAMAS APP– RECAPP core capabilities

Modus operandi (returns),
internal decision making

RECAP summary of requirements from workshops - April 2025

Internal
decision
making,
cooperation
with MS



Next Steps in the process

1.

Gathering and fine-tuning of business and technical requirements (business case)

2.

Survey to MS – interest declaration and potential dependencies with other projects

Internal decision-making

3.

Further technical discussions with interested MS

4.

Timeline – Minimum Viable Product depending on the scope to be available summer 2026

5.

Connection to national system – pilot projects based on expression of interest

Discussion

- Based on the RECAPPP workshops and national-level discussions, do you foresee benefits in integrating RECAPPP with your national return case management systems?

Internal decision-making

- At the national level, is there interest in linking the [REDACTED] [REDACTED] with return-related activities for identifying, communicating with, and monitoring persons subject to return?

The redacted parts are out of scope, as well as the rest of the document

RBP - FRONTEX INSTRUMENTS

Development of RECAPP



Return Digitalization Programme 2025-2026

Rest of the document is out of scope

Out of scope, unless indicated otherwise



Other projects

RECAP

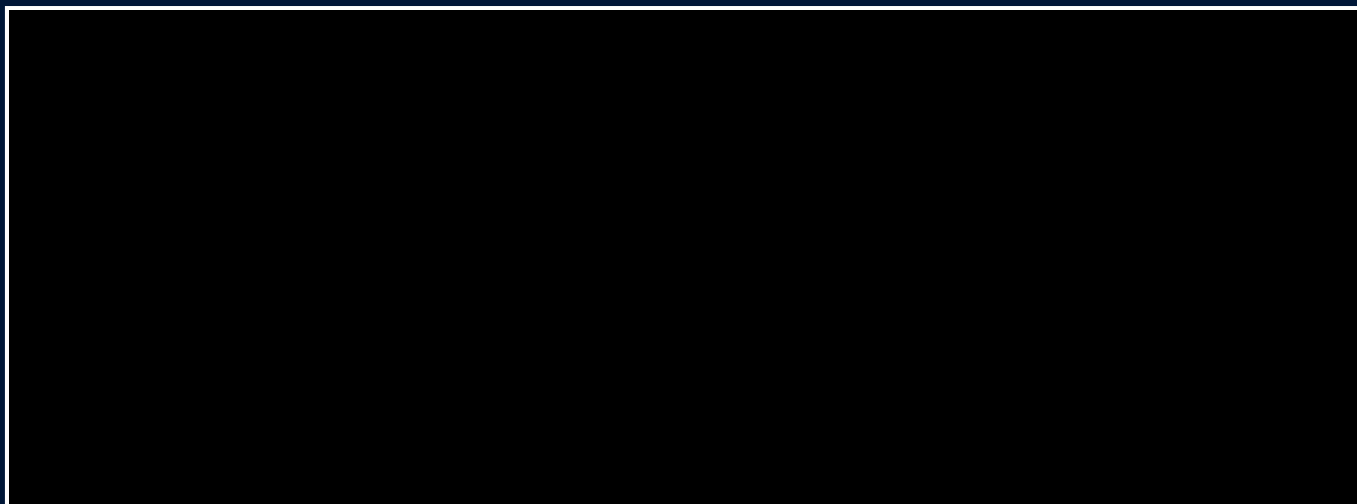




FRONTEX INITIATIVES



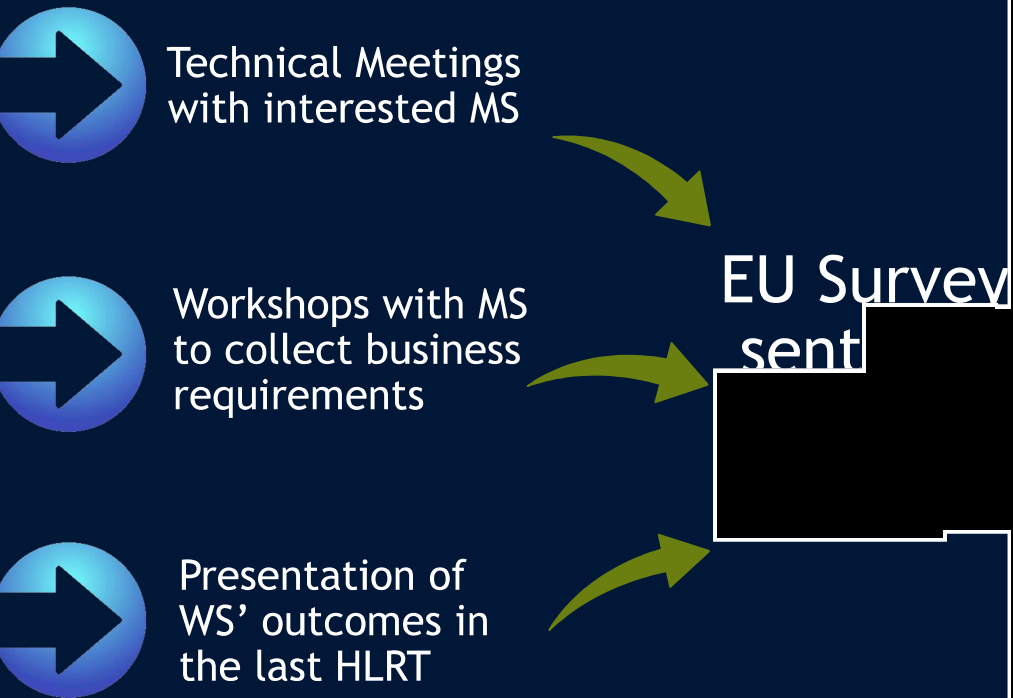
RECAPP



Tools and technologies designed to support Member States in fulfilling return obligations
ensuring respect for fundamental rights

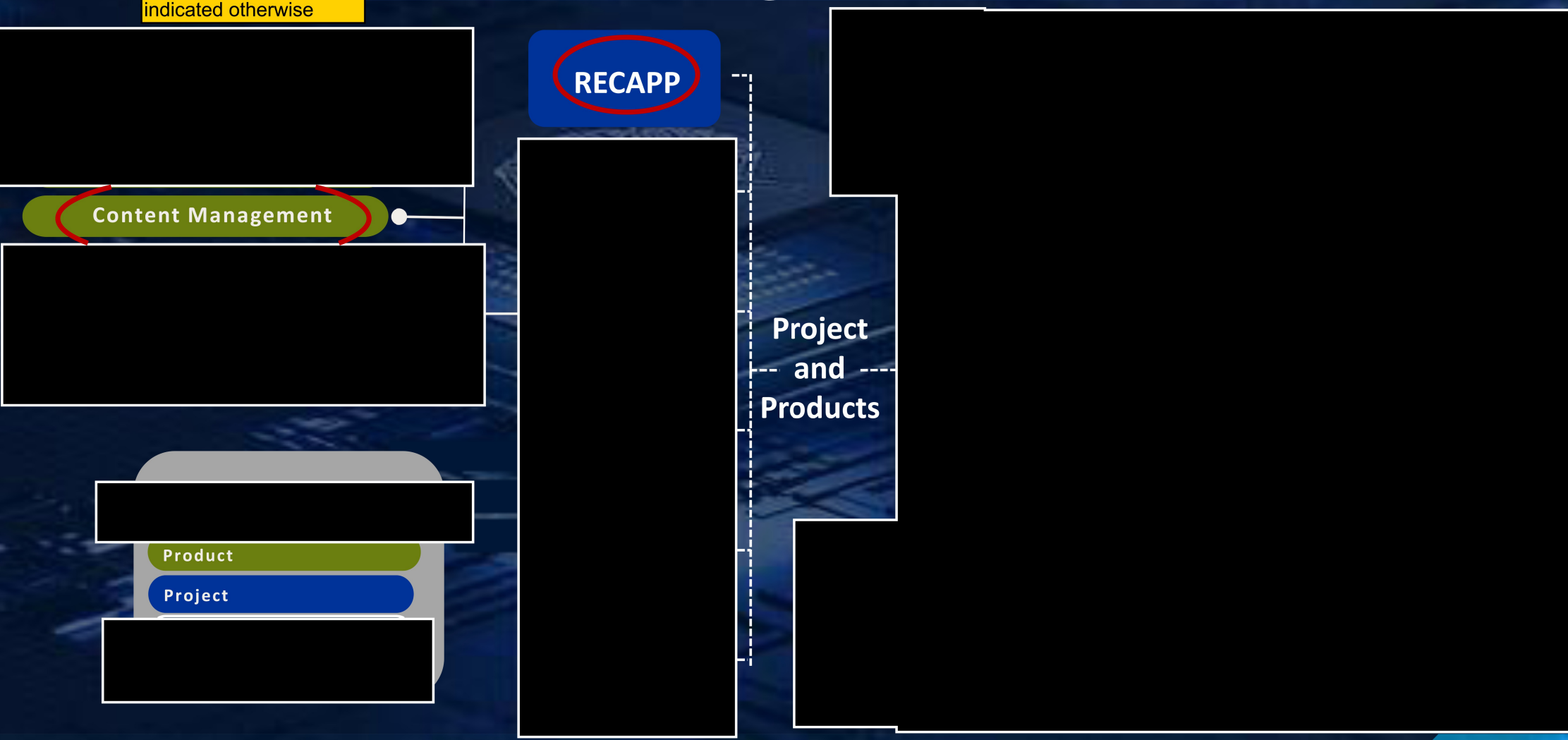
Return Mobile APP - RECAPP

Internal decision making,
cooperation with MS, modus
operandi (returns)



Rest of the document is out of scope. The redacted parts herein are out of scope, unless indicated otherwise

Return Digitalization



RECAPP – SOP and next steps



Recamas App – RECAPP

Business Requirements Workshop with MS practitioners

April 2025

Agenda

1. Purpose of these workshops
2. Ground rules
3. Frontex view on Return & Reintegration toolbox
4. RECAPP core capabilities summary
5. Detailed discussion on Functionalities & Capabilities

Purpose of the workshops

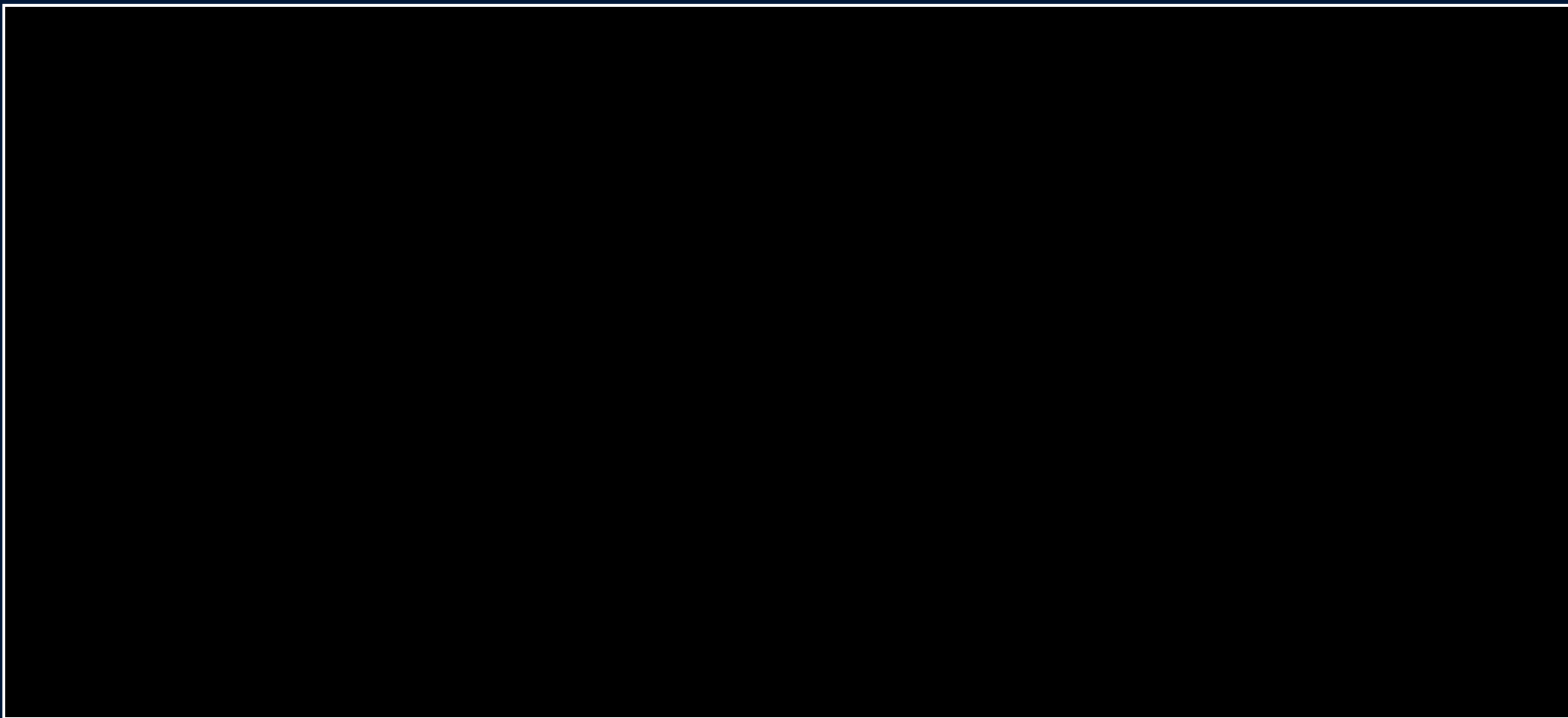
1. Discuss the planned RECAPP functionalities to collect detailed feedback, namely if:
 - they should be fine-tuned or enhanced to better align with Member States' needs or
 - additional capabilities would be requested to be added to the scope.
2. Understand interest in the use of each functionality from each Member State, including the feasibility of usage of the functionality in the context of the current MS's legal framework.

Feedback collected will be the input for the project scope definition and features prioritisation.

Ground rules

1. Each functionality will be discussed separately, in the following structure:
 - presentation of the functionality in details
 - answering questions for clarifications of the current scope and suggestions of refinements
 - collecting interest feedback and comments from each MS
2. Discussion about suggestions for additional capabilities

Return & Reintegration digital toolbox



Internal decision making,
Modus operandi (returns)

Return & Reintegration – RECAPP core capabilities

Functionalities/Core capabilities

Discussion with MS

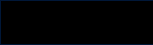
General features

Modus operandi
(returns), internal
decision-making

Modus operandi (returns), internal decision making

Modus operandi (returns), internal decision making

Modus operandi (returns), internal decision making



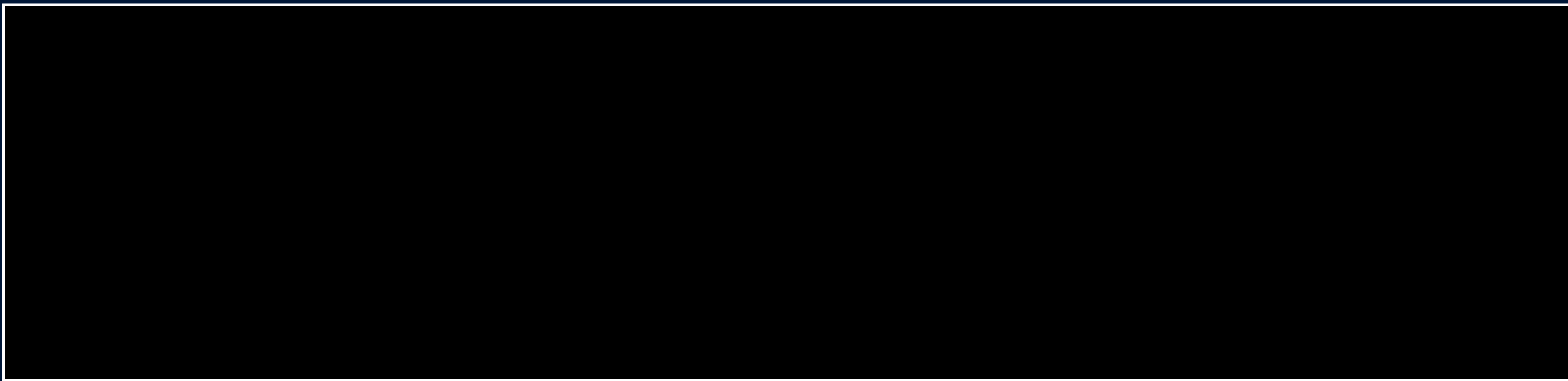
Modus operandi (returns), internal decision making





Modus operandi (returns),
internal decision making

Modus operandi (returns), internal
decision making



Modus operandi
(returns), internal
decision making

Modus operandi (returns), internal
decision making



Modus operandi (returns), internal decision making, cooperation with MS

Additional features?

- How MS foresee the use of the App
- What do MS miss in the proposed features?

Recamas App – RECAPP

Business Requirements Workshop with MS practitioners

April/September 2025

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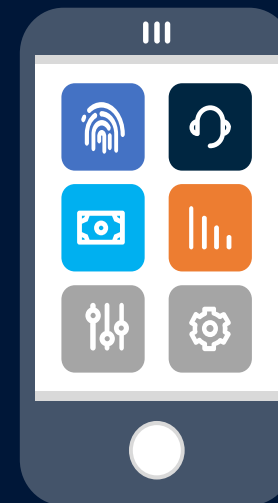
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Return & Reintegration digital toolbox



RECAPP objectives and core capabilities



Backoffice Portal & Mobile App

Modus Operandi (returns)

Return & Reintegration – RECAPP core capabilities

Internal decision making,
Modus operandi
(returns)

Functionalities/Core capabilities

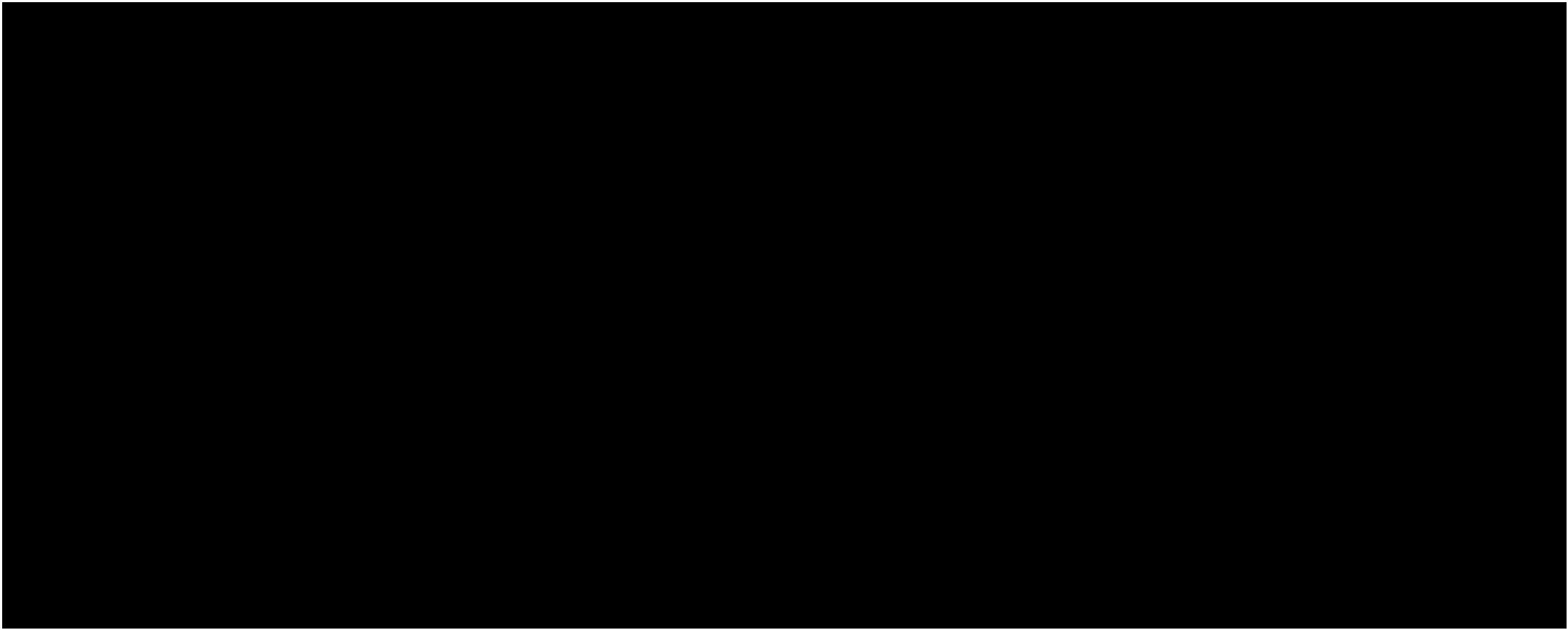
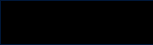
Discussion with MS

General features

Modus operandi (Returns), internal
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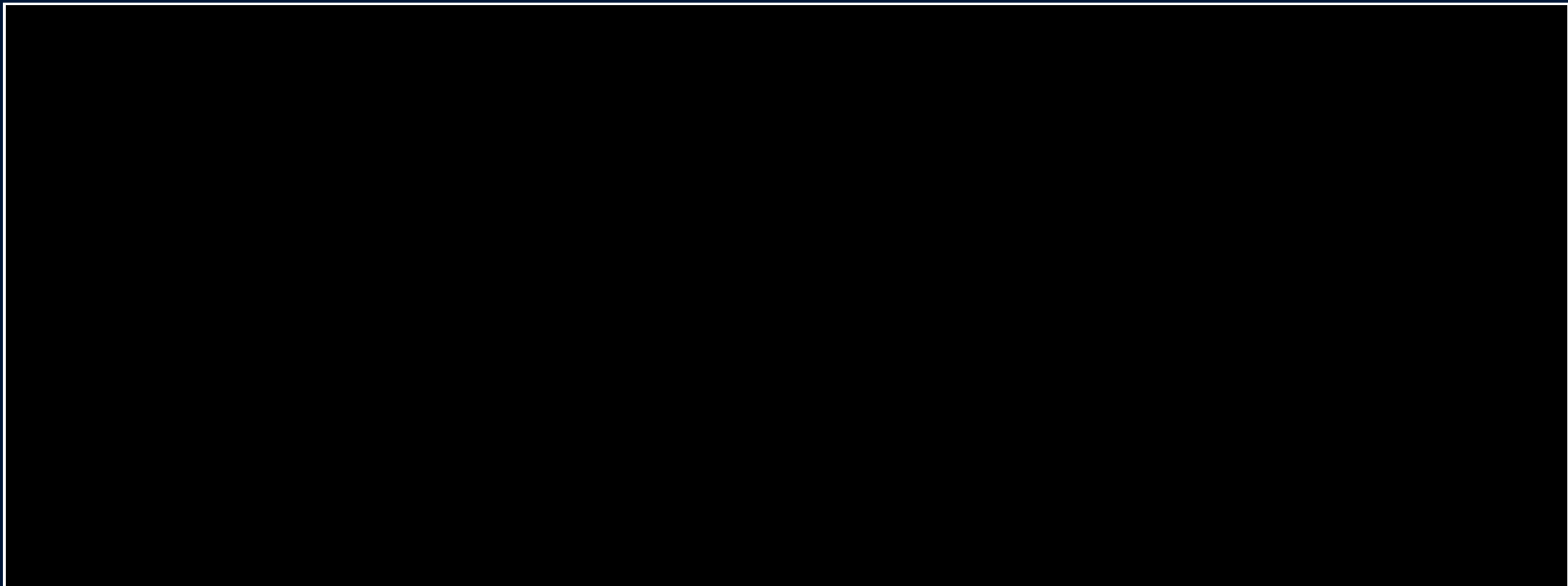


Modus operandi (Returns), internal
decision-making





Modus operandi (Returns), internal
decision-making



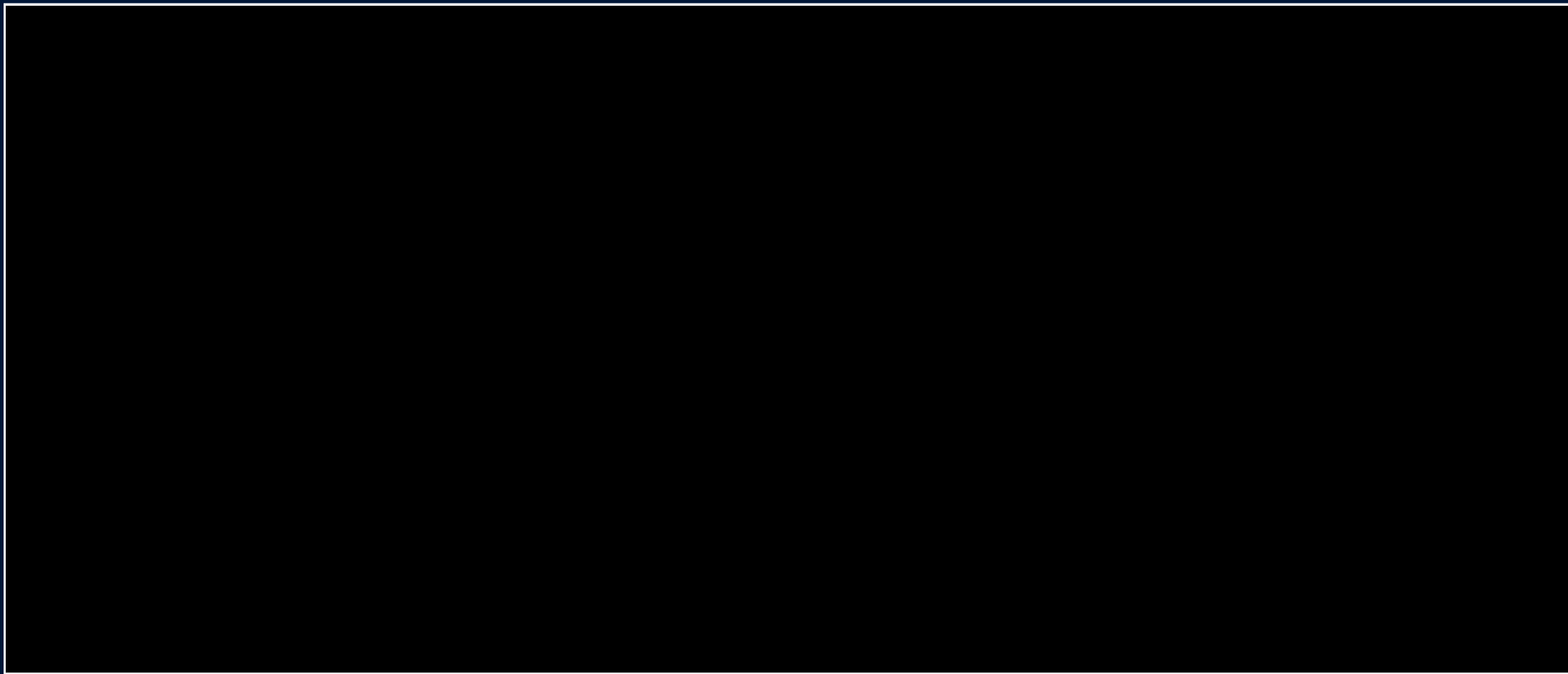
Modus operandi (Returns), internal
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Modus operandi (Returns), internal
decision-making, cooperation with MS

Modus operandi (Returns), internal
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Modus operandi (Returns), internal
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Additional features?

- How MS foresee the use of the App
- What do MS miss in the proposed features?

Recamas App – RECAPP

Business Requirements Workshop with MS practitioners

April/September/October 2025

Agenda

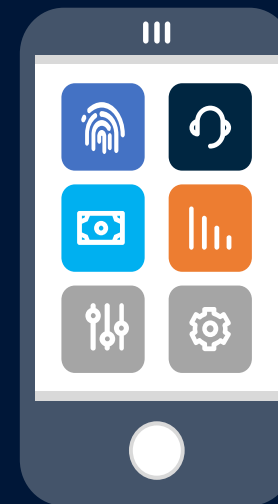
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Modus Operandi (returns)

Return & Reintegration digital toolbox



RECAPP objectives and core capabilities



Backoffice Portal & Mobile App

Modus Operandi (Returns)

Functionalities/Core capabilities

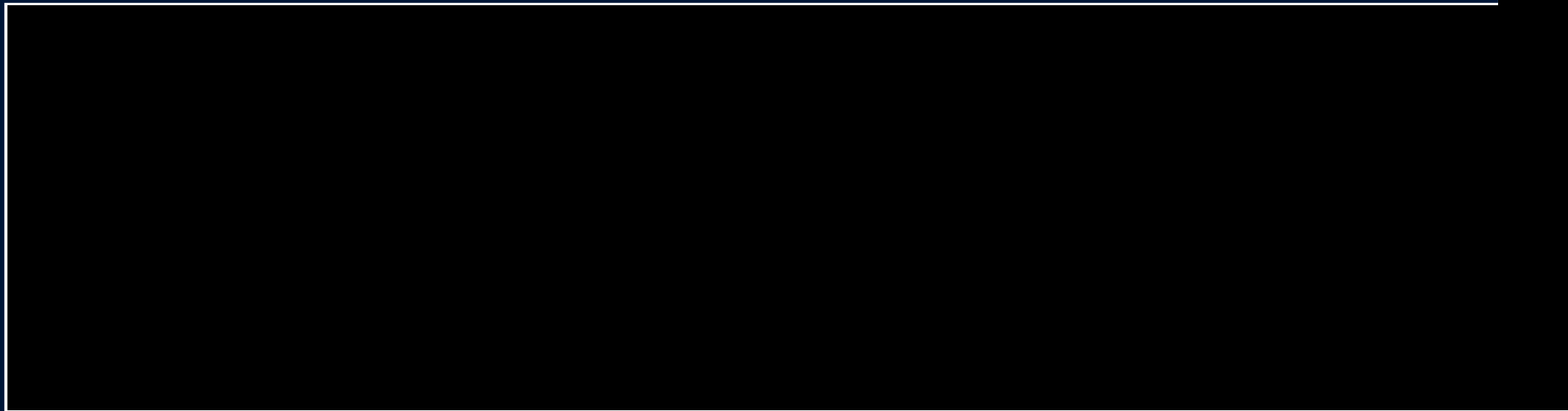
Discussion with MS

General features

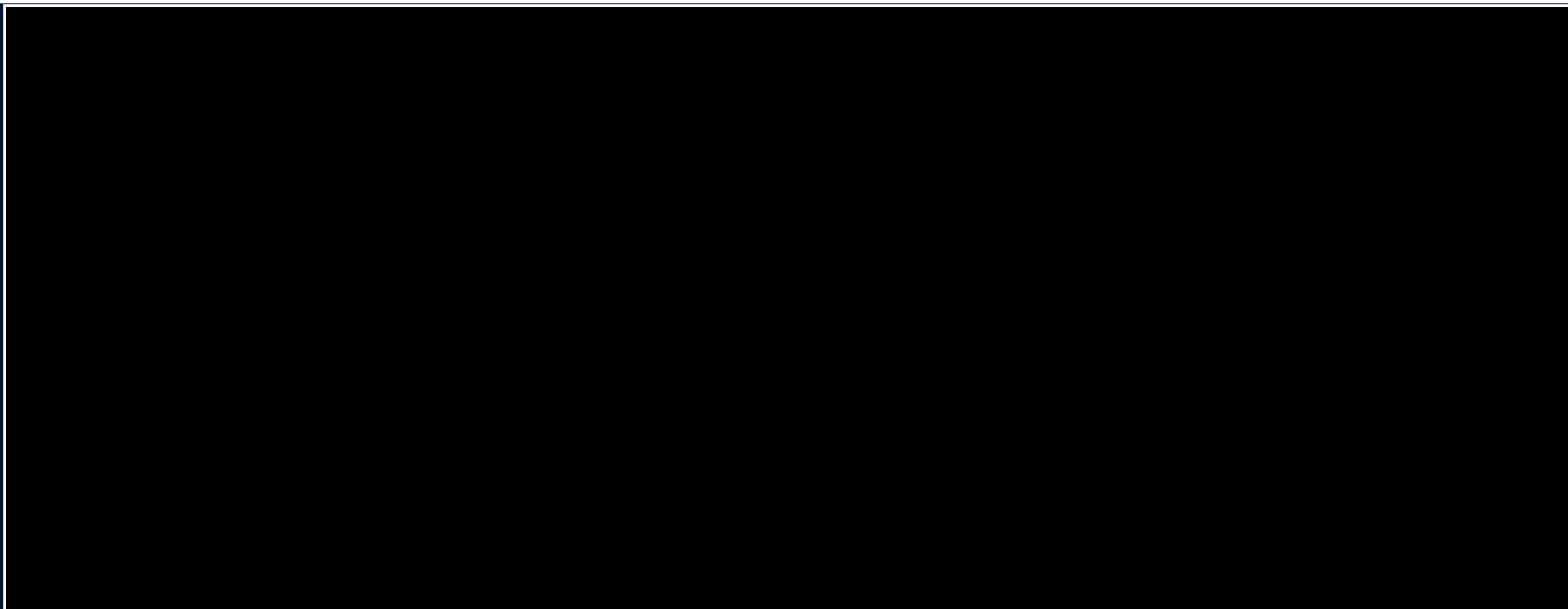
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