

Large-scale review of the European Commission

Recommendations by the 15 workstreams

Input document to the final report

13 July 2026

Dear colleagues,

I am pleased to share with you the results of the work carried out by the 15 workstreams established as part of the large-scale review of the European Commission's organisation and operations. This marks an important milestone in our collective efforts to further improve and future-proof the way we work together.

Since November 2025, more than 150 colleagues from across the Commission have worked to develop recommendations on how to modernise and improve the way we work across 15 key areas. The document before you, with almost 100 recommendations, is the outcome of this extensive process of collective reflection and collaboration.

This work would not have been possible without the hundreds of colleagues who contributed in other ways through interviews, the suggestion box, replying to questionnaires or taking part in meetings. The level of engagement, transparency and involvement from across the Commission has been unprecedented – a big thank you to all!

While the workstream recommendations provide key input for the final report, they will be complemented by additional building blocks, including the report from the High-Level Group on the Future of the European Civil Service, the input from staff representatives, staff, and the external benchmarking exercise, among others.

I would like to extend my special thanks to the workstream leaders for successfully delivering on the task given to them. They have not only produced relevant and ambitious proposals to feed into the final report; throughout the process, they have also exemplified a modern and inclusive approach to leadership, demonstrating the values that should underpin the way we work at the Commission: trust, collaboration and inclusiveness.

I would also like to express my sincere gratitude to all crew members from across the Commission who contributed to this phase of the review. They undertook this important work in addition to their regular responsibilities, and I am deeply grateful for their commitment and dedication.

Now we are entering the next stage of the process. Drawing on these recommendations and other key inputs, my role will be to prepare the final report to be presented to the President by the end of the year.

I am confident that this process will contribute to making the Commission more attractive, more efficient, and more agile in meeting the challenges of the future.

Thank you once again for your commitment and contribution to this important endeavour.

Commissioner Piotr Serafin
13 July 2026

These workstream reports are informal working documents of the European Commission, which are not for distribution outside the European Commission.

The working documents were prepared by groups ('crews') of highly-dedicated, volunteer staff members, and as such do not represent the views of the Commission as an institution.

The workstream crews were explicitly invited to be bold and creative in their work, to be forthright in their assessments of the current situation (the 'problem statement'), and ambitious in identifying the possible ways forward.

In fulfilling these mandates, they have also had to take the risk that some of the language used in the problem statements, if deliberately taken out of context, could be seen to be critical of the existing organisation of the Commission. This is not the aim of the exercise.

The workstream reports should therefore be read as the outcome of an open and inclusive reflection process, which has sought to identify and map both different, and sometimes contrasting, perceptions of the current situation and sketch out relevant possible responses.

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Executive summary Purpose and values

Problem statement

Over the past two decades, the European Commission's role has changed profoundly. It has moved beyond its traditional administrative and regulatory functions to take on a more political and increasingly geopolitical leadership role, helping to coordinate common European responses to crises, emergencies and strategic challenges. This transformation needs to be matched by a clear, organisation-wide articulation of the Commission's purpose and a systematic re-examination of its structures and ways of working, which tend to be the results of legacy more than of design. Without these, the institution may find itself with an expanded and more complex mandate without having a shared understanding of what binds it together as a single organisation.

In the absence of a clearly shared, overarching, institutional purpose, staff often identify more strongly with their own Directorate General/service than with the Commission as a whole, reinforcing silo-working, inter-service rivalry and limited collaboration across the institution. **A strong alignment of structure, working methods and resources towards the agreed common purpose is a prerequisite for an effective and performant 'One Commission'.**

The challenge is compounded by the absence of a clearly defined and shared set of organisational values. Although the Commission is guided by Treaty values and administrative rules, it does not have a commonly agreed institutional value statement that translates these foundations into a lived organisational culture. As indicated by the staff survey results, Commission staff shows a strong commitment to the European project, but this enthusiasm is frustrated by a prevailing corporate culture which is often rigid and risk-averse. **A set of common organisational values embedded in everyday practices and behaviours would build a genuine 'One Commission' *esprit de corps*** and encourage decisions based on shared judgement, mutual trust and common direction, while reducing reliance on detailed compliance-based instructions. It is crucial for the new common purpose and values not to remain simply as declarations of good will, but rather to become a source of organisational transformation and renewal of corporate culture.

The rapid development of artificial intelligence adds a new and urgent dimension. While the Commission should actively embrace and benefit from **integrating artificial intelligence in its operations**, it must use agreed organisational values and purpose as guardrails for the development of its AI agents. AI systems are not neutral: they reflect the commercial priorities, design choices and cultural assumptions of their developers.

Taken together, upgrading the organisational purpose, values and lived culture would offer a strategic opportunity to the Commission to transform itself coherently and to perform its evolving role with unity, increased legitimacy and resilience.

Recommendations

1. 'One Commission' with a clear overarching purpose

The Commission should articulate a clear, shared and up-to-date organisational purpose that reflects the significant evolution of its role over the past two decades. This should provide strategic direction for the institution as 'One Commission', support staff engagement and serve as a basis for assessing whether current structures, governance arrangements, resource allocation and ways of working remain fit for purpose.

2. 'One Commission' with a value-based esprit de corps

The Commission should draw up and promote a clear and commonly understood set of organisational values, building on the principles enshrined in the Treaties and relevant administrative frameworks. These values should be embedded across the institution to strengthen a shared 'One Commission' corporate culture and to foster collaboration and a sense of belonging.

3. Create a value-based framework to shape and adopt AI agents

The Commission should embrace AI as an opportunity to enhance performance while also ensuring that agents are developed in line with our values and our common institutional purpose. AI systems should be systematically assessed and periodically reviewed against the Commission's mission, organisational purpose and core values.

4. Turn the common purpose and values into organisational reality

The Commission's purpose and values should be reflected in its day-to-day ways of working. To achieve this while creating a more agile and innovative corporate culture, an organised transformation process needs to be launched. A key to success is for leaders at all levels to embody these values and demonstrate them consistently.

Recommendations on purpose and values

Articulating and embedding a common purpose and values will give a direction to all other aspects of the large-scale review process, contribute to building a more agile, collaborative and innovative Commission and motivate staff to be more performant by sharing a common *esprit de corps*.

‘Nothing is possible without men; nothing is lasting without institutions. Institutions can, if they are well built, accumulate and transmit the wisdom of successive generations.’ Jean Monnet

Recommendation 1: "One Commission" with a clear overarching purpose

Problem statement

The European Commission currently lacks a clearly articulated, shared and up-to-date organisational purpose that can guide everyday operations, support arbitration between competing priorities and foster a shared institutional identity. While leaders and staff recognise the Treaty-based mission of building an ever closer Union and serving Europe, this is not always precise or motivating enough to provide practical direction for the institution as a whole.

Over the past two decades, the Commission’s role has evolved substantially. In addition to its established functions, it has assumed a more political and increasingly geopolitical role, notably in coordinating and executing common European responses to crises and emergencies, while operating alongside a more prominent European Council. However, this expanded mandate has not been matched by a clear articulation of the Commission’s purpose in organisational terms.

As confirmed by in-depth leadership interviews conducted by the Joint Research Centre (JRC) for the LSR, the absence of a commonly agreed purpose contributes to silo-thinking, inter-service rivalry and weak cross-organisational collaboration. Staff often identify more strongly with their individual Directorate General/service than with the Commission as a whole, limiting cohesion, weakening *esprit de corps* and reducing the institution’s capacity to act as a unified organisation.

Proposed solution

The Commission should articulate a clear, shared and up-to-date organisational purpose that reflects the significant evolution of its role over the past two decades.

This should provide strategic direction for the institution as ‘One Commission’, support staff engagement and serve as a foundation for assessing whether current structures, priorities, resource allocation and ways of working remain fit for purpose.

The Commission’s overarching purpose needs to encompass new priorities. In the past, the Commission has led major initiatives such as introducing a common currency or creating the Single Market. This workstream has identified **building a stronger and more independent Europe in the world** as the call of our time.

Such an overarching purpose should guide decisions on policy priorities, budget and staff allocation as well as organisational structure.

In addition, this newly defined mission should be anchored in the principle of ‘**One Commission**’ – a single, coherent institution that serves the European public, and which has a clear strategic direction that all staff, Directorates-General and agencies contribute to.

Serving the European public should remain the primary focus, in line with the principle set out in the Treaties that the public administration should be first and foremost European. All staff should be able to understand and identify with the overarching purpose and shared mission.

Implementation

First, define the Commission’s common purpose and a vision statement through strategic leadership reflection.

The Commission should launch a structured reflection led by its top political leadership to articulate a clear and up-to-date organisational purpose as well as a vision statement for the institution as a whole. This process should distinguish between:

- **Core roles – what the Commission is today**, focusing on indispensable functions such as the Single Market, competition policy, and safeguarding the rule of law.
- **Non-core roles – what the Commission was yesterday**, encompassing activities that are identified by the College as no longer central or that can be more efficiently handed back to Member States.
- **Emerging priorities – what the Commission must become tomorrow**, including new common European interests (defence and security, societal resilience, digital and AI innovation) that require dedicated capacity and investment.

This reflection may happen at the beginning of each political mandate and, if appropriate, be framed through major political moments such as the State of the Union address.

Second, implement the agreed purpose by aligning resources, priorities and structures to it, and ensure internalisation by line DGs.

Once the starting point is agreed on by leaders, the implementation process would be for the Commission services. An agreed common purpose statement would serve as a basis for various Directorate Generals to adjust their roles accordingly. It should also be communicated clearly and consistently to all staff. The objective should be to create a shared institutional reference point that strengthens coherence, supports prioritisation and reinforces a 'One Commission' perspective. The organisational structure, priority setting and resource allocation should be aligned with the overarching purpose, including clarifying areas to be stopped.

Third, review and update the overarching purpose as needed.

The Commission should put in place a regular process to revisit and, where necessary, update its common purpose. This may be timed to coincide with the beginning of each political mandate. This would ensure that the institution's organisational purpose remains aligned with its evolving political, strategic and operational context, while preserving continuity with its Treaty-based mandate.

The following guiding principles should be used in the definition and operationalisation of the purpose and mission statements:

- **Unity and coherence:** A single narrative that brings together all Directorates-General/services under the „One Commission' banner, ensuring a united and cohesive approach across the organisation.
- **Future-orientation:** Reflecting the current role of the Commission but also anticipating future challenges and opportunities.
- **Transparency and inclusiveness:** The reflection process should involve the top political leadership and, where appropriate, engage with staff and stakeholders to ensure a comprehensive understanding of the Commission's purpose.
- **Outcomes, impact and performance:** The role and missions of the Commission should be defined in a way that will deliver concrete outcomes, with a real impact and based on performance.

Example of a VISION STATEMENT – One Commission

The European Commission's core purpose and mission is to serve and protect the interests of Europeans by safeguarding the Treaties and giving concrete expression to the EU's values. By combining vision with action, the Commission inspires Member States and the public alike, turning common challenges into shared opportunities and translating European values into tangible progress. Its purpose is not only to pursue the path of European integration but to shape the next chapter of the European project: a Union that protects, empowers and unites; an independent and sovereign Union that acts with confidence in the world; and a Union that continues to bring Europeans ever closer together through solidarity, prosperity and shared destiny. Through ambition, innovation and trust, the Commission must continue to make the European Union one of history's most successful and inspiring geopolitical projects.

Recommendation 2: 'One Commission' with a value-based *esprit de corps*

Problem statement

While the institution is anchored in the values and principles set out in the Treaties and supported by administrative rules and frameworks, these do not amount to a shared and explicit set of organisational values that are consistently understood and applied across the Commission.

The European Commission's unique role in building Europe calls for a distinct set of values that matches the ambitious nature of the European project itself. As an institution charged not only with administering policies but with advancing a shared European future in close collaboration with Member States and the European Parliament, it must be guided by values that reflect courage, solidarity, integrity, openness and a commitment to the common good. Commission staff already feel deep pride in contributing to this collective mission, but **that pride should be more fully translated into a stronger *esprit de corps* across the institution.**

In the absence of a common values framework, staff are more likely to identify primarily with their individual Directorate General, service or professional environment rather than with the Commission as a whole. This reinforces silo-thinking, limits collaboration across organisational boundaries and weakens the development of a shared 'One Commission' *esprit de corps*.

The lack of clearly articulated and embedded values also contributes to inconsistency in leadership behaviours, management practices and decision-

making across the institution. Without a common reference point, the day-to-day application of institutional principles may vary significantly between services and hierarchical levels, reducing coherence, predictability and trust within the organisation.

In addition, the absence of an explicit and shared values base can increase reliance on detailed rules, procedures and compliance mechanisms to guide behaviour, rather than enabling a culture grounded in common judgement, responsibility and public service ethos. This may limit agility, initiative and the institution's capacity to adapt its internal culture to its evolving role.

At a time when the Commission is expected to operate as a more agile, collaborative and strategically coherent institution, the lack of a shared set of organisational values weakens staff engagement, undermines a sense of belonging and reduces the institution's ability to act as a unified organisation. Addressing this gap is essential to strengthen internal cohesion, support effective leadership and foster a stronger shared institutional identity.

Proposed solution

'Men who are placed in new practical circumstances, or subjected to a new set of obligations, adapt their behaviour and become different. If the new context is better, they themselves become better: that is the whole rationale of the European Community, and the process of civilisation itself.'
Jean Monnet

While individual Directorates General have continuously articulated their own values over the past decades, a 'One Commission' common value set should present values that unite the institution beyond individual DG cultures. Rooted in the Treaties and the Commission's public mission, these values should define **what it means to act as 'One Commission' in service of Europe and its people**. We recommend articulating and communicating a limited set (four to five) of core Commission organisational values. These can start from the values of **openness, efficiency and independence** as set out in Article 298.1 of the Treaty on the Functioning of the European Union. Interviews with leaders and staff satisfaction surveys indicate these values are widely shared and can be complemented by **commitment to Europe, collaboration and innovation**.

To have real effect, they should be made visible in leadership behaviour, management practice and everyday decision-making across all levels of the organisation.

Implementation

First, identify and validate a set of core values with the participation of staff and managers.

The Commission should develop a set of common organisational values rooted in the Treaties, the Commission's public mission and its strategic objectives. These values should be designed to guide behaviour across the institution while remaining broad enough to accommodate diverse personal and political orientations, reflecting the plurality of European society. They should be actionable, measurable and relevant to how the Commission leads, decides and works. The involvement of staff and managers should aim not only to identify the most meaningful and widely supported values, but also to build understanding, ownership and acceptance

Second, communicate and integrate the values across the organisation

Once agreed on, the values should be communicated clearly and consistently across the institution and translated into practical application. Communication should clearly explain why shared values matter, how they would benefit staff and how they would support a stronger 'One Commission' culture.

Third, ensure the internalisation of organisational values through training, appraisal and promotion to a higher grade.

Implementing common values should also include integrating them throughout the organisation in procedures and practices. They should guide everyday behaviour and not remain a standalone statement.

Recommendation 3: Create a value-based framework to shape and adopt AI agents

Problem statement

Artificial intelligence is rapidly becoming embedded in the European Commission's day-to-day work, yet the institution does not currently have a sufficiently developed framework to ensure that its use is guided by the Commission's purpose, public mission and core values. This creates a growing strategic challenge. Unlike traditional software, AI systems increasingly shape analysis, recommendations and decisions in ways that reflect the assumptions, priorities and values of their developers. In most cases, these systems are designed outside the Commission, and often outside the European Union, because of commercial logics and cultural choices that may not necessarily align with Treaty objectives or the Commission's institutional role.

At the same time, the Commission cannot afford to fall behind in the adoption and practical use of AI. If it fails to embrace these technologies, it risks losing efficiency, weakening its capacity to deliver on its responsibilities and falling behind other public and private sector organisations that are already using AI to improve performance, responsiveness and strategic capability. The challenge is twofold: the Commission must accelerate experimentation, learning and responsible uptake of AI in order to remain effective, while also ensuring that the systems it adopts or develops do not shape policy design, implementation or communication in ways that are at odds with the public interest. Without a purpose-driven and value-based approach, the Commission risks both diminished capability and the gradual embedding of technologies that may steer its work in directions inconsistent with its mandate.

Proposed solution

Invest in AI capability and infrastructure

The Commission should invest in the technologies, tools and enabling infrastructure needed to integrate AI effectively into its operations. This includes identifying priority use cases, supporting experimentation and piloting, and ensuring that staff have access to secure and appropriate AI solutions that can improve efficiency, quality and responsiveness.

Build staff skills and organisational readiness

The Commission should equip staff and managers with the knowledge, skills and confidence to use AI responsibly and effectively in their daily work. This means providing practical training, promoting learning by doing, sharing good practice across services and helping teams understand the opportunities and limits of AI in support of the Commission's mission.

Establish governance and value-based guardrails

Alongside uptake, the Commission should develop a clear governance and assurance framework to guide the use of AI across the institution. This framework should ensure that AI systems and practices are aligned with the Commission's purpose, public mission and core values, so that shared values act as guardrails for innovation, risk management and institutional trust.

Recommendation 4: Turn the common purpose and values into organisational reality

Problem statement

The European Commission's current, largely implicit corporate culture and values can discourage initiative and favour caution, proceduralism and non-action over experimentation and responsible risk-taking. In practice, this can reduce the institution's capacity to generate new ideas, act with agility and deliver effectively in a fast-changing policy environment.

Excessive procedural demands can consume significant working time and divert attention from higher-value policy work, reducing efficiency and motivation. Staff also have limited opportunities to represent the institution publicly and speak about their work, as these functions are increasingly given to designated spokespeople. This can reduce staff ownership, visibility and engagement. At the same time, budget concerns limit the opportunities for staff to visit projects or attend events, bringing a **risk of disconnection from reality on the ground.** Furthermore, over time the geographical balance of staff has become overly concentrated on some Member States, diminishing the plurality of backgrounds and insights that are essential for the quality of Commission policy design.

The increasing number of Access to Documents requests to Commission services is making it **harder to preserve a safe space for internal policy development that foster experimentation and responsible risk-taking.** This constrains the institution's ability to explore new and innovative solutions and to debate difficult trade-offs between competing priorities. When early-stage ideas are exposed too quickly to external scrutiny or criticism, including from corporate or advocacy actors, services may become more cautious and less willing to test options before they are sufficiently mature.

This challenge is compounded by a lack of trust and collaboration across parts of the organisation. Where staff do not feel supported to work across boundaries, share emerging ideas or challenge established ways of working, collective problem-solving becomes more difficult and innovation is constrained.

Taken together, these factors contribute to a culture that is less open, less collaborative and less enabling than the Commission requires. Without a more explicit and supportive corporate culture and values that encourage trust, initiative, internal debate and shared ownership, the institution risks limiting staff engagement, suppressing innovation and weakening its ability to deliver on its priorities. The absence of an articulated shared purpose and values also undermines the Commission's ability to attract and retain top talent and to foster

a sense of belonging and motivation among current staff, who remain highly committed to serving the European project.

Proposed solution

Launch a dedicated culture transformation process. Building on what already exists, set up a central transformation team, supported by a network with at least one designated person in each Directorate General, to drive and coordinate culture change across the institution in line with the Commission's shared purpose and core values.

Make leadership explicitly accountable for culture change. Leaders at all levels should be required to embody the Commission's purpose and values, foster trust and collaboration, create space for internal debate, and support responsible initiative and innovation within their areas of responsibility.

Review rules, procedures and incentives in the light of the desired culture. The Commission should identify and remove tensions between its stated values and the systems that shape staff behaviour, including excessive procedural burdens, disincentives to collaboration and barriers to innovation and responsible risk-taking.

Create safe internal spaces for policy development and staff ownership. The Commission should enable protected internal discussion and early-stage policy experimentation before ideas are exposed to external scrutiny, while also expanding opportunities for staff to represent the institution and speak about their work within an appropriate framework.

Strengthen a common *esprit de corps* across the institution. The Commission should foster closer contact between staff and political leadership, organise more corporate events across DG boundaries, and make greater use of recognition and celebration of collective achievements to build a stronger sense of belonging and a shared 'One Commission' identity.

Implementation

Building an *esprit de corps* means turning 'One Commission' from a concept into a lived reality – where shared identity, mutual trust and pride in our work unite us in delivering for Europeans.

This organisational transformation process is linked to the actions of several other LSR workstreams.

Leadership and Compliance:

- Introduce an Oath to Europe for the Commission Senior Management.
- Update the rules and processes around the selection and promotion of leaders to ensure that 1) they can inspire staff and help them connect to purpose through visionary leadership and 2) each of them is aligned with the Commission's organisational values. Embed these aspects into a new leadership competence framework for the Commission.
- Offer leaders both formal training and a peer learning platform on how to inspire their staff to deliver on their commitment to the European project, its current purpose, values and practices.
- Update the 2020 Commission Communication 'Governance in the European Commission' and the 'Code of Good Administrative Behaviour' to reflect the newly articulated values.
- Base compliance more on values and less on rigid rules and procedures, to facilitate risk-taking and foster agility.

Integration into Organisational Processes:

- Incorporate the articulated values into formal and informal HR processes, including recruitment, performance appraisals and career development, with a focus on addressing underperformance and recognising excellence.
- Develop structured training programmes on the Commission's values, targeting both newcomers and existing staff - starting with leaders.

Collaboration and Innovation:

- Train all staff formally on collaboration principles and share good collaboration practices to foster a culture of teamwork and mutual support.
- Launch a corporate project focusing on organisational culture change towards more collaboration, agility, risk-taking and innovation-friendliness, using these values as guardrails and foundation for AI use in the Commission.
- Develop a different approach to work across and between Directorates General and agencies where staff are challenged to find common solutions to the issues at hand rather than protecting sectoral interests.
- Recreate safe spaces for policy debate and drafting and institutional memory by adjusting 'access to documents' and other rules to encourage open dialogue and collaboration while allowing for experimentation with new approaches and technologies (including AI) and freedom to go beyond (or against) existing policies or regulations.

- Create incentives to encourage innovation, creativity and risk-taking to achieve real world impact, notably for policy areas where synergies and trade-offs need to be tackled.
- Ensure fair treatment by handling underperformance effectively and recognising overperformance better.

Staff Engagement and Recognition:

- Introduce a 'Commission pride' framework, reinforcing a shared institutional identity and the core values.
- Provide day-one recognition (a welcome letter by the President?), milestone recognition and career-stage rituals to acknowledge staff contributions and reinforce the values.
- Increase **meaning** in work by helping staff see their **impact** through site visits, staff exchanges, speaking opportunities and enterprise experiences.
- Establish regular, structured visits by the President and College members to Directorate Generals and services, including open staff dialogues and town-hall style meetings to reinforce the values.
- Ensure equal treatment of temporary staff by honouring everyone's contributions and fostering a sense of belonging.

This recommendation covers the development of a common organisational culture, direction and *esprit de corps* among Commission staff, as well as the leaders' key role in transmitting this purpose and embodying these values. It explicitly does not cover developing new policies or legislation but rather focuses on the internal transformation of the Commission to better support its mission and values. The recommendation also does not cover the specifics of the MFF-related restructuring, and instead, aims to ensure that the organisational culture change is an integral part of this process. The transformation process should be designed to be flexible and adaptable, allowing for adjustments and improvements as needed. It should not have a strict or too short timeframe, as culture change is a slow and gradual process. The focus on strengthening institutional pride and staff engagement are key design principles, as are improved trust and communication between leadership and staff. Over the long term, these actions can help to drive positive changes across the Commission by broadly tackling all three aspects of the large-scale review: agility, efficiency and attractiveness.

If the European Commission were fully to embody the values of openness, efficiency and independence, commitment to Europe, collaboration, and innovation, its corporate culture would be marked by the following features:

1. A strong sense of common purpose

Staff would feel a clear connection not only to their own service or Directorate General, but to the Commission's wider mission of serving Europe and advancing the European project. This shared purpose would strengthen institutional loyalty, pride and *esprit de corps*.

2. Open and trusted communication

The culture would encourage openness in dialogue, transparency in reasoning and constructive challenge. Staff would feel more able to raise concerns, test ideas and engage in honest debate, while leaders would communicate clearly and listen actively across all levels of the organisation.

3. Collaboration across boundaries

Services would work together more naturally across portfolios, disciplines and hierarchies. A 'One Commission' mindset would reduce silo-thinking and inter-service rivalry, making cross-cutting problem-solving and joint ownership of outcomes the norm rather than the exception.

4. Efficient, empowered ways of working

Processes and decision-making would be streamlined, proportionate and focused on results. Staff would be trusted to exercise judgement within clear parameters, reducing unnecessary bureaucracy and enabling quicker, more effective delivery.

5. Independent judgement anchored in the European interest

Acting with professionalism and integrity, officials are guided by evidence, public service and the long-term European interest. Independence would be understood not as distance or caution alone, but as the capacity to take balanced decisions free from undue influence.

6. A culture of innovation and learning

The Commission would support experimentation, responsible risk-taking and continuous improvement. Staff would be encouraged to explore new approaches, learn from experience and use technology, including AI, in ways that strengthen the institution's effectiveness and public mission.

7. Safe space for reflection and policy development

There would be greater room for internal discussion, early-stage thinking and debate on difficult trade-offs before ideas are exposed externally. This would help the Commission generate more creative, robust and strategically coherent policy solutions.

8. Leadership that models the values

Managers and senior leaders would consistently demonstrate these values in their behaviour, decisions and management practices. This would create greater coherence across the institution and help translate abstract principles into a lived organisational culture.

In sum, such a culture would be more united, confident, agile and mission-driven: a Commission that works as one institution, acts in the European interest and is better equipped to meet complex policy challenges.

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Executive summary Leadership

Problem statement

The European Commission operates in an increasingly contested world and a period of compounding pressure: geopolitical instability; rapid technological shift, in particular with regard to Artificial Intelligence; and rising expectations of what the institution must deliver. Meeting the challenges of this moment depends on the **quality of leadership** at every level.

The Commission needs leaders who generate high trust, empower networked teams to act, and draw strength from diverse and inclusive perspectives to tackle increasingly complex, multi-domain challenges. The Commission needs inspiring leaders who drive wider change and treat tech-forward innovation and intelligent risk-taking not as exceptions but as part of how the institution works.

At the same time, the Commission is approaching a **major internal transition**: a large share of today's senior management (about 36%) and middle management (more than 17%) is projected to retire in the coming years (2026-2030). A shift of this magnitude will inevitably reshape organisational memory, informal networks, and the leadership pipeline. This creates both risks and a unique opportunity to renew leadership practices at scale.

The ambition, need and expectations for **good leadership** in the Commission are clear. Some persisting gaps and key drivers for improvement are also clear. A shared **definition** of good leadership is missing. This weakens the Commission's capacity to **equip current managers and prepare future managers** to be the good leaders we want and need them to be. Definitions alone will not suffice. Building and sustaining good leadership requires **concerted effort and pro-active policy**, with concrete actions and binding follow-up; this must include tackling bad practices in a credible way. A profound cultural shift should accompany this policy: good leadership is only possible if we set up the organisation to **offer leaders the space they need** to focus more on leading the institution, empowering staff and driving change rather than managing processes. At the same time, **non-management leadership roles** should also be valued and nurtured.

We propose six recommendations to reshape how the Commission selects, develops and supports its leaders, based on a future-ready leadership pipeline. The recommendations are interconnected and not sequenced: the package will work best if all segments can be developed and implemented.

We believe that change is possible, and we have the means to make it happen.

Recommendations

1. Introduce a new capability framework for good leadership

We expect managers to be credible good leaders. We propose to make this a formal requirement for the management career track in the Commission, and to build a pro-active leadership policy around it.

2. Place succession planning at the centre of leadership policy

We know that the Commission will face a major wave of retirement in the coming years affecting management posts. We propose to take concrete action well in advance to minimise the risk of long gaps and improve business continuity, in particular for senior management.

3. Set up a credible and attractive 'leadership fast-track' programme

We count on a wealth of good leadership talent in the Commission. We propose to design a well-structured and attractive learning and development offer to nurture this talent. For staff who wish to pursue the management career track, we propose to link this offer to a credible, transparent and competitive programme to help progress faster to the required eligibility conditions.

4. Support good leadership with concrete actions

We want to be honest: good leadership is an aspirational target. Leaders will not be perfect, and they will always need to improve; we trust they want to. We propose to offer them the space, support and resources they need to reflect on their performance, learn and do better. We believe that regular, personalised and constructive feedback from staff and line managers is paramount, and that follow-up should be mandatory.

5. Free leadership from unnecessary administrative burden

We need to be realistic: support for managers to be good leaders starts by freeing them from the routine, low-risk administrative tasks that can be safely delegated without compromising compliance and accountability.

6. A centre of excellence to nurture leadership and talent as one system

We acknowledge that our recommendations demand a concerted effort that cuts across different organisational layers, mandates and timelines. We propose setting up a dedicated entity to steer and coordinate this effort. We believe this entity should take the format of a 'Centre of Excellence'.

Recommendations on leadership

Organisational **leadership** (defining purpose, setting direction, creating meaning, mobilising people, modelling values, and enabling adaptation in complex or uncertain contexts) is to some extent **distinct from management** (planning, organising, allocating resources, ensuring compliance, and delivering results efficiently and consistently).

In practice, Commission leaders are expected to **excel at both leadership and management**. In periods of relative stability, strong management may be sufficient; in periods of sustained complexity and change, leadership becomes decisive.

This workstream treats **leadership and management as a combined agenda**, while recognising that needs may vary by context (for example: budget execution vs a crisis task force) or level of responsibility (top management vs team leaders) and that leadership styles must be adaptable within a shared corporate frame.

Recommendation 1: Introduce a new capability framework for good leadership

Problem statement

The current **competency frameworks** for middle and senior management appear **no longer fit for purpose**. They were designed with a focus on management skills that does not capture today's needs for trusted, agile and adaptive people-centric leadership.

Proposed solution

We recommend establishing a **new, forward-looking, enforceable capability framework for good leadership**. In line with the OECD 'Leadership for a High Performing Civil Service' (2020), the term 'capability' is used deliberately, to capture qualities such as good judgement, attitudes to collaboration, risk and innovation, systems thinking and emotional intelligence that go beyond a skill or competency check-list.

Available evidence (including external benchmarking, the latest staff survey indicators, in-house leadership interviews) underlines the aspiration for leaders with the ability to collaborate openly in complex configurations, empower and engage staff at all levels. In the latest survey, Commission staff and managers were asked for the first time about the most important **leadership values**: both groups agreed on the top four of **trust, care, effectiveness, and collaboration**.

Good leaders should also treat technology – and AI especially – as an opportunity rather than a threat. In the staff survey, 57% of respondents are excited about how AI can enhance or transform part of their job; this percentage rises to 75% for senior management.

The new framework should consistently **inform all segments of leadership policy and practice** at corporate (across departments) and 'local' level (to cater for function- and policy-specific aspects). This means that the new framework should underpin, for example: selection and appointment; career options, including the possibility of fluid moves from management to advisory roles; access to programmes for talent management (future leaders) and personal development (appointed leaders); performance appraisal; internal and external competitions.

Implementation

Recommended concrete actions include:

- Modernise the two existing competency frameworks (middle and senior management) to include a corporate capability framework for good leadership. This framework should spell out a core set of **capabilities** with **observable behavioural indicators** [see Box 1 - Example of 'observable behaviours' for good leadership].
- Modulate the corporate core framework according to leadership level and policy-specific context. Regular '**fitness checks**' should make sure the framework keeps pace with institutional and external changes (for example: check every five years).
- Reflect the new framework in the relevant legal basis – i.e. the Compilation Document on Senior Officials Policy SEC(2004) 1352, and Commission Decision C(2016)3288 on middle management – and make it **binding for the selection, appraisal and promotion of leaders**. At the same time, reinforce the possibilities and streamline the procedures for **non-confirmation or removal** in cases where the core standards are consistently not met.
- Design and apply **revised tools** for developing, selecting, promoting, appointing and appraising managers, based on the new framework. This would help **re-align current management functions** with the good leadership capabilities framework. At the same time, it would set the standard for good leadership capabilities as a **must-have for future managers**.
- Expand the use of **multi-source feedback mechanism (360°)** as a **permanent and systematic tool** to support good leadership. This means, for example: using it regularly (not as a one-off), with reports available to

line managers; making follow-up mandatory; and using reports and follow-up as key elements for managers' performance appraisal.

- Harness the potential of internal communication at corporate and local level to showcase examples of good leadership, with a focus on staff-based feedback. This would help build trust in the new capability framework and align it with shared purpose and values.

Box 1 – Example of 'observable behaviours' for good leadership

1. Core Values & Institutional Commitment

- **Shared EU Values & Purpose:** Believes deeply in and actively promotes the EU's mission, principles (e.g. democracy, rule of law, solidarity), and long-term goals.
- **Loyalty & Commitment:** Demonstrates dedication to the institution, its people, and its objectives.
- **High Sense of Duty:** Acts with a strong moral and professional obligation to serve the public and the organisation.

2. Personal Drive & Work Ethics

- **Strong Personal Dedication:** Goes above and beyond, showing passion for the institution's success.
- **Hardworking:** Sets a high standard for effort, productivity, and perseverance.
- **Resilience:** Bounces back from setbacks and maintains composure under pressure.
- **Ambition:** Strives for excellence and continuous improvement, both personally and organisationally, but not at the expense of others.

3. Leadership & Strategic Direction

- **Strategic Vision:** Thinks long-term, anticipates challenges, and aligns actions with overarching goals.
- **Informed Decision-Making:** Draws on competence, expertise, and experience (technical, policy, and institutional) to make sound judgments.
- **Political & Diplomatic Sense:** Navigates complex environments with tact, balancing stakeholder needs.
- **Courage/Bravery:** Takes bold stands for what is right, even in adversity (e.g., defending EU values or staff under pressure).
- **Inspiration / Charisma:** Inspires staff.

4. Adaptability & Crisis Management

- **Flexibility:** Adjusts approaches to meet evolving needs or unexpected challenges.
- **Risk appetite:** Is open to taking risks to the appropriate extent.
- **Adaptability in Crises:** Responds effectively to geopolitical, organisational, or societal disruptions (e.g., pandemics, conflicts), including de-prioritisation.
- **Responsiveness:** Acts swiftly and decisively when situations demand it.
- **Creativity & Agility:** Innovates and pivots strategies in a rapidly changing world.
- **Change management:** Actively supports staff in transformation.

5. Driving Innovation & Technology

- **Pro-innovation mindset:** Champions experimentation and intelligent risk-taking; treats innovation as part of normal work, learning from both success and failure.
- **Technology & AI fluency:** Actively explores the opportunities offered by AI and emerging technologies, understands their risks and limitations, and keeps knowledge current as the technology evolves.
- **Enabling intelligent use of technology:** Empowers teams to use AI and digital tools to solve problems and to free time from routine tasks for higher-value, people-centred work.
- **Responsible & human-centric use:** Ensures technology is used ethically and lawfully, with human judgement kept firmly in the loop.
- **Driving change:** Actively leads and supports staff through transformation and new ways of working.

6. Empowerment & Team Development

- **Empowerment:** Delegates authority and trusts teams to deliver, fostering ownership.
- **Coaching & Growth:** Invests in developing others' talent, skills and careers (e.g., mentoring, training); provides feedback and opportunities to learn.
- **Protecting the Team:** Shields staff from unfair criticism, burnout, or external threats.
- **Engagement:** Actively involves staff in decisions, listening to their ideas and concerns.
- **Fairness:** Ensures equity, impartiality, and justice in decisions and treatment of staff.

7. Emotional Intelligence & Interpersonal Skills

- **Empathy:** Understands and addresses the emotions and needs of colleagues.
- **Humour & Positivity:** Uses warmth and good humour to build rapport and reduce stress.
- **Transparency & Communication:** Shares information openly and communicates with clarity.
- **Social-Emotional Intelligence:** Manages relationships with self-awareness and compassion.

8. Collaboration & Mobilisation

- **Unifying Leadership:** Brings diverse groups together around shared goals.
- **Capacity to Mobilise:** Inspires and organises teams to act collectively toward objectives; fosters team commitment.
- **Trust-Building:** Earns trust through consistency, integrity, and competence.
- **Collaboration:** Actively seeks and supports collaboration across entities.
- **Partnership building:** Develops networks.

9. Accountability & Integrity

- **Taking Ownership:** Accepts responsibility for outcomes—both successes and failures.
- **Authenticity:** Acts with honesty and sincerity, avoiding pretence.
- **Doing the Right Thing:** Prioritises ethical choices, even when difficult.

Recommendation 2: Place succession planning at the core of leadership policy

Problem statement

Internal evidence suggests that **management vacancies** tend to remain **unfilled for long periods of time**.

In the case of senior management, over the last three years only about 20% of posts did not remain vacant at all after the departure of the jobholder. Part of the problem lies in established practices, not legal requirements. For example, decisions to publish vacancies are taken only when posts become formally vacant, or shortly before. Combined with the typical length of selection and appointment procedures, this can result in protracted stand-in (or 'acting') arrangements.

Prolonged leadership gaps hinder the orderly handover of institutional memory and knowledge. They are detrimental to efficient delivery and negatively affect leadership credibility and staff morale. At senior and top management level, long gaps also pose delivery and reputational risks for the organisation.

Internal data indicate that approximately 36% of Commission senior management will retire in the next four years (2026-2030). This adds a level of **urgency** that requires a pro-active, structured and targeted approach.

Proposed solution

We recommend putting in place a new system for **structural succession planning** that pro-actively anticipates departures of senior management instead of reacting to vacancies. This would help reduce gaps to a minimum and contribute to institutional resilience. Ideally, top-level positions should not be vacant for longer than two months.

We see succession planning as a **key enabler for faster decisions on top management appointments**. To this aim, it should revolve around three core and interconnected ideas: systematic needs anticipation (plan in advance); sound assessment of capability gaps along with development opportunities (candidates fully equipped to be good leaders); targeted solutions for periods of peak departures (as many procedure steps completed as possible before the post becomes formally vacant).

Implementation

Recommended concrete actions include:

- Draw up a **rolling list of senior management posts** to be filled over the next four years, built from projected retirements and mobility (five years in the job).
- Take **early decisions** on whether, for each senior management post that is projected to be vacant **in the next 12 months**, to publish a vacancy or fill the position by transfer of staff.
- Harness the potential of **targeted cross-departmental career moves**, based on early identification of the senior managers interested in mobility so that they can be pre-matched with upcoming vacancies and better prepare for their transition.
- **Analyse and actively manage** the existing **cohort of senior managers**: map their experience, skills, talent development needs, feedback track record on good leadership. This should happen in the best interest of the institution and with due regard to the duty of care for the people concerned.
- Introduce **targeted solutions** to manage upcoming peak vacancy periods. For example: create 'anticipatory' ranges of candidates for groups of similar upcoming vacancies for senior management posts. This would involve candidates going through most of the selection stages before the vacancy is published, which would make it easier for the College to proceed with informed decisions on appointments. As another example: simplify the process of selection for DG posts where candidates are DDGs with a positive track record of good leadership.

Recommendation 3: Set up a credible and attractive 'Leadership Fast-Track' programme

Problem statement

Current career pathways are such that staff may have the required skills, knowledge and experience (including acquired outside the Commission), and yet cannot access management positions because **they do not have the required eligibility grades**.

Internal estimates indicate that, at the start of 2026, the cohort of staff in AD5-AD7 grades (not eligible for middle management posts) includes roughly 40 Deputy Heads of Unit and 450 staff in informal coordination roles (head of sector, team leader, etc.). Likewise, the cohort AD9-AD11 (not eligible for senior management) comprises about 300 Heads of Unit.

High potential for good leadership in this pool – and in the general staff – is confronted with a fragmented offer of development opportunities. For example: offer may be available only in some DGs; information on cross-DGs initiatives is scattered; structured follow-up is lacking and links to career progression are unclear. This is combined with slow standard career progression and consequently long ‘waiting time’ before accessing the entry grades for management appointments. This limits the institution’s ability to make the best use of its talent pool.

Proposed solution

We recommend putting in place a thoughtful, credible and attractive **fast-track programme for future leaders**, based on an ambitious, deliberate and structured process. The programme should feature measures to detect, develop and formally recognise **high potential for good leadership** (as defined in the new capability framework). It should be based on **merit, transparency and equal opportunities**.

This would be a significant corporate investment in good leadership: successful completion of the programme should be duly taken into account for **promotion** and also as an alternative to at least part of the **formal selection process for management posts**.

Implementation

Recommended concrete actions include:

- Design and implement a coherent **offer for leadership talent development**. This should combine general and personalised **learning paths** (mix of mandatory and optional) with on-the-job learning opportunities, coaching and mentoring. The offer should include assignments to cross-DG projects, temporary mobility, and space for peer networking and exchange.
- Within this context, launch a **dedicated fast-track programme for future leaders**. The fast-track programme should include at least one **temporary posting** to a management role (for example, two years). The programme could also offer **strategic secondment to other organisations**, in line with Commission policy priorities and foresight. Secondments should be valued as a means to consolidate in-house capacity to prevent ‘tunnel thinking’ and feed new and different perspectives back into the work of the institution.
- Provide access to the fast-track programme on a **competitive and transparent basis**. Multi-source feedback mechanisms and structured

appraisals focused on leadership abilities should inform progress evaluation (milestones) and final graduation from the programme.

- Make **talent detection** an **explicit task for line managers**. To this aim, strengthen and streamline the section on 'level of responsibilities' in the performance appraisals to capture proof of good leadership starting from informal coordination roles and assignments. Develop solid corporate guidance to ensure an equal playing field across reporting officers.
- Establish a credible and transparent process to assign **informal leadership roles** in each DG (for example: project-based, tandem and co-leadership arrangements, time-limited assignments), so that pre-identified talent can have more opportunities to test their abilities, grow on the job, and assess the management track option. This would help promote a culture that values good leadership also outside management roles.
- Support and streamline talent detection at corporate level by creating a **corporate 'talent repository'**. The repository, supported by IT and AI tools, would aggregate available data (for example: CV, appraisal, career, assessment centre reports, 360° data) to help match talent potential and development needs with suitable opportunities. The repository could also have a dedicated section to support succession planning.
- Organise **agile internal competitions** targeting good leadership as defined in the new framework. This would enable the Commission to formally recognise the talent and experience that staff have before joining the Commission or that they accumulate in the Commission but outside the grade or function required to be eligible for formal management positions.
- Complement leadership development with a **practical toolkit for crisis-readiness support**. This could include scenario exercises, training on decision-making under uncertainty, and light crisis playbooks for common surge situations (rapid reprioritisation, staffing reallocation, communications under pressure). Consider drawing up a Commission-wide '**surge roster**' and peer support network to help leaders mobilise quickly while maintaining staff sustainability [see Box 2 - Leading in times of crisis: lessons learned and way forward].

Box 2 – Leading in times of crisis: lessons learned and way forward

Leadership in times of crisis, such as the financial crisis, COVID-19 pandemic or the energy crisis following Russia's invasion of Ukraine demonstrated that effective leadership under extreme time pressure depends on a **different set of skills and behaviours** than leading in normal situations. The following lessons learned are an illustration of what could define an efficient crisis leader in the European Commission and how these lessons can help make the administration more agile, resilient and future proof.

- **Be agile and flexible in structures and processes**

Crises demand speed. Flat and agile organisational structures, such as **ad hoc task forces and cross-units project teams**, are essential to enable **rapid reactions** and **direct access to decision-makers** (senior managers and political level). These structures allow flexibility, foster creativity and the ability to operate in uncertain environments. They must be supported by streamlined but robust procedures that ensure legally sound decisions while significantly reducing bureaucratic delays. The ability to anticipate risks, reallocate resources quickly and think out of the box are key in times of crisis.

- **Provide strategic direction and communicate clearly**

Effective crisis leadership requires setting clear priorities and a **shared sense of direction** across the organisation. In times of crisis, having a clear mandate around defined policy objectives ensure that every level of the organisation moves in the same direction rapidly and focuses on the most critical objectives. It is the role of the leaders to communicate these clearly and consistently to avoid misalignment. Strong political alignment with Member States and close coordination with other key stakeholders are also critical.

- **Stay calm, focused and lead with confidence**

Crises require decisions with **incomplete information** and under **intense time pressure**. Leaders must remain calm, resist addressing specific interests and avoid requesting **non-essential actions or artificial deadlines**. Clear delegation and empowerment of teams are key to maintaining focus on core policy objectives. Calm and confident leadership helps prevent panic, supports team motivation and enables the wider organisation to continue functioning effectively.

- **Build trust through transparency and empowerment**

Trust is critical in crisis situations. Open, honest and regular communication strengthens trust between leaders and teams and fosters collective resilience. Recognising exceptional efforts, encouraging innovation and learning from setbacks help teams remain engaged and effective.

- **Embed post-crisis lessons learned exercise**

Every crisis must be followed by a **structured lessons-learned process** to systematically assess what worked and what did not, and translate these insights into improved policies, tools and governance structures. Institutionalising learning ensures better preparedness and more effective decision-making in future crises.

In conclusion, leading in times of crisis means acting quickly with decisive, innovative, yet compliant, actions, aligning people around clear priorities, communicating with transparency and confidence, and continuously strengthening the organisation's capacity to respond to future challenges.

Recommendation 4: Support good leadership with concrete actions

Problem statement

Formal management roles are still anchored in a mix of technical/policy expertise combined with managerial competences. The wider context of **leadership values and capabilities is not fully captured**, despite growing staff expectations and the institution's needs in this respect.

The latest staff survey indicates a significant gap in perception between how managers (in particular senior managers) rate their performance and how staff rates it: the staff 'positivity score' of management perception was only 52%, compared to 84% for senior managers (self-rating).

The current organisational culture does not value fluid career moves between management and non-management/advisory roles. In fact, the non-management career track is still considered less appealing, and 'stepping down' from management posts is not normalised as a career option. There are therefore limited incentives to 'move out' of management roles.

And yet, mismatches between management practice and good leadership expectations carry a high cost in terms of staff engagement. The JRC in-house leaders' interviews, for example, stress the corrosive dynamic of a '**credibility gap**': what makes bad leadership particularly damaging is the perception that the institution does not act on what it knows. Respondents point to leaders with well-documented shortcomings being promoted, moved sideways or left in place. The gap between what the institution says it values and what it actually rewards erodes trust and drives disengagement.

At present, the system lacks constructive options and pathways to deal with such situations.

Proposed solution

We recommend reviewing the way leaders are **selected and evaluated**, building on the new capability framework for good leadership. This should go hand-in-hand with more accessible and valued options for shifting between management and advisory functions.

Implementation

Recommended concrete actions include:

- Overhaul the **assessment-centre process** to align with the revised capability framework for good leadership. On this basis, give greater weight to assessment-centre reports for the purpose of selection. The selection for senior management, in particular, should also take into account the track record of candidates in their current leadership role.
- Expand the use of **multi-source feedback mechanism (360°)** as a **permanent and systematic tool** to support good leadership. This means, for example: making it regular and mandatory; making reports available to line managers; ensuring and monitoring follow-up; making sure the follow-up feeds into the performance appraisal process for managers and decisions on their future assignments.
- Make participation in **leadership development mandatory** for all leaders. Content should be tailored to the level of leadership and adjusted to the level of experience. For example, a corporate 'Executive Leadership' programme could focus on creating a structured learning and development system for current leaders, to coordinate and tailor development activities (training, coaching, mobility, etc.) depending on the interests of the person concerned and the needs of the service.
- Consider creating some leadership positions with a **limited term of duration**. Consider making renewals of the term and permanent appointments genuinely dependent on **demonstrated good leadership**, as evidenced by a combination of results delivery, multi-source feedback (360°) and its follow-up, successful participation in leadership development programmes.
- Promote opportunities to make **positive in-and-out career moves** (valued and supported by the organisational culture) between management and advisory positions. This should be coupled with a better definition, pro-active and strategic use of advisory roles.
- Good leadership requires not only recognising and rewarding positive behaviours, but also taking seriously behaviours that undermine trust, inclusion, performance or staff wellbeing. Clear mechanisms should be in place to provide feedback, support behavioural improvement, and, where necessary, ensure accountability.

Recommendation 5: Free Leadership from unnecessary administrative burden

Problem statement

Leaders currently carry a **heavy administrative load** that shrinks the time they can (and should) devote to people management, strategic direction, and innovation. Responsibilities keep expanding (more files, faster delivery, new reporting obligations) but the resources do not rise in step with demand and procedures remain complex.

At the same time, many management approvals aim for accountability on paper, but do not distinguish the high-frequency, low-risk, routine approvals that could be safely delegated, from the low-frequency high-risk decisions that truly demand leaders' attention and informed decisions.

A culture of over-compliance appears to be at play, partly generated by the legitimate need of management and staff to feel safe within the boundaries of their mandates and responsibilities. Without tackling this situation, expectations of inclusive, trust-based 'good leadership' become utterly unrealistic.

Proposed solution

We recommend carrying out corporate and DG-level reviews to **remove administrative overhead and friction from leaders**, supported with concrete guidance.

OECD research indicates that highly skilled senior leaders still fall short due to systemic constraints: lack of autonomy, misaligned incentives, rigid management systems. The same analysis holds that leadership objectives must be matched with appropriate autonomy and accountability, and that greater autonomy requires a supportive environment and clear expectations.

For the Commission, JRC in-house interviews with leaders describe an environment of over-centralisation and reactive overload, aggravated by a resource-responsibility gap that makes trust-based leadership unrealistic. They also call for '**accountable simplification**' and **institutionalised negative priorities**, so that leaders can spend their time leading people rather than navigating procedures.

Implementation

Recommended concrete actions include:

- Promote a **culture of delegation and empowerment**, ensuring that decisions and tasks are handled at the most appropriate level and that leaders can spend proportionally more time on people and strategy than on process management.
- Provide **guidance** on how to expand delegations and bring in standardised, risk-based approval thresholds.
- Require an annual negative-prioritisation (**'stop-doing'**) **exercise** at corporate and DG level (including low-value reporting), with top-down support for de-prioritisation.
- Allocate resources strategically and aligned with organisational priorities.
- Create **shared administrative support pools**.

Recommendation 6: Establish a Centre of Excellence for Leadership to nurture leadership and talent as one system

Problem statement

Leadership policy and practice across the Commission today is fragmented. Opportunities for professional development, succession planning, innovation thinking, talent detection, and reference competency frameworks are scattered across different places and not managed as a single system. This means that recommendations on leadership risk being adopted on paper but not implemented consistently – unless we identify **a clear owner for the follow-up**.

Proposed solution

We recommend creating a **permanent corporate entity** in the form of an in-house '**Centre of Excellence for Leadership**', with the mandate to take ownership of the leadership development agenda – including its tech-forward aspects.

Such structures exist in other organisations, and having a standing body responsible for carrying out regular review, stakeholder engagement and impact measurement is benchmarked as best practice.

Implementation

Recommended concrete actions include:

- Draw up a clear **mandate** for the Centre, establish ownership at the highest level, resource it appropriately, and make it distinct from other governance bodies.
- Give the Centre responsibility for **supporting and overseeing implementation of the leadership recommendations**, including the design of 360°, succession planning, fast-track programmes, a focus on AI-ready leadership.
- Start as a small, agile entity with the ambition to evolve over time into a reference centre for public-sector leadership. Open – in the medium-to-long term – to attract and develop external talent where needed to supplement the internal talent pool.
- Empower the Centre to set up a network of internal and external training and development partners to support the whole lifecycle of leadership identification, development and support.
- Task the Centre with building and keeping current the Commission's offer of training and development on AI- and technology-ready leadership, with a regularly updated development track (immersion courses, hands-on sessions, peer exchange) for current and future leaders.

*** **

The reflection of this workstream drew extensively from the knowledge and experience of the crew members, and from fruitful exchanges with other workstreams. Some evidence was produced internally and helped frame the problem analysis at the outset on succession planning and the currently fragmented offer for talent management and development. For the rest, the crew drew on evidence compiled by the LSR team, in particular: input from the consultation of JPP (junior professional programme) members; focused analysis of the staff survey data; five 'Best Practices and Emerging Trends White Papers' (on career pathways and progression; competency frameworks; talent acquisition; talent development and growth strategies; workforce planning), and a selection of OECD papers. The crew valued greatly the JRC contribution of focused research briefs on management and leadership, and insights from 61 qualitative in-house interviews with leaders.

Executive summary Talent acquisition

Problem statement

While there is a general understanding that the Commission staff is highly competent and high-performing, we face growing challenges in attracting, developing, and retaining top talent. This is particularly acute in highly competitive and emerging specialist domains such as AI, cybersecurity and defence. Attracting talent to sites beyond Brussels is becoming a pressing problem in its own right, and the geographical distribution of staff remains unbalanced.

A large and complex set of factors hide behind these challenges, but several clear opportunities for change stand out. They concern the selection and recruitment system itself, the need to be more creative and impactful in respect of sites beyond Brussels - starting with Luxembourg - and the case for more intensive outreach and genuine, professional workforce planning and evaluation.

Measured against comparable international organisations and other employers, in **the Commission** it may take years to move from application to a permanent contract or clear pathway towards one. The process is perceived as slow and overly complex, with candidates lost in a maze of external and internal routes that demand high personal investment for slim prospects of success. While the system is designed to respect every legal requirement and to offer equal opportunity to all, it carries a real risk of turning motivated young people into sceptics - and of losing the very best talent along the way.

The recommended way forward is to start afresh, on a small number of clear principles: valuing on-the-job experience, keeping the time from application to first salary as short as possible, and ensuring a positive experience for the applicant throughout. The system must be readily adaptable to the institution's shifting competence needs and capable of attracting the very best talent. Complementary measures – enhanced workforce planning, reinforcement of the attractiveness of sites outside Brussels, and targeted outreach – are essential to support these core objectives.

Recommendations

1. Simplified recruitment

First, we recommend replacing all existing external and internal routes towards a permanent career with a single rolling application process that can be entered several times a year. Its starting point is a **computer-adaptive diagnostic test**¹, which gives the applicant a score that allows them to apply for particular posts. The threshold would be set high enough - in combination with formal educational and work experience - to reduce the number of potential applicants that access to a proper in-person assessment. This should provide a faster, client-friendly process and reduce the risk of an AI-driven process where the applicant's and the recruiter's AI agents communicate. It will also allow for a positive dialogue and experience for the applicant where they can understand better the conditions, tasks and development opportunities offered.

By default, the successful applicant would receive a temporary agent contract – and therefore a position on an existing establishment post – for two or three years, during which they are assessed with a view to permanent recruitment. This allows fast entry followed by a reasonable period for both sides to test fit.

2. The new purpose and function of internal competitions

With entry to a permanent career now running exclusively as mentioned above, internal competitions are retained but redirected. Freed from the task of stabilising fixed-term staff, they are dedicated solely to the career advancement of established officials and no longer serve as a mechanism for changing status.

The recruitment of contract agents on time-limited contracts linked to provisions in the general budget or to specific budget lines, would of course continue. A contract agent is well placed to sit the rolling test and re-enter through it as a temporary agent, with their Commission experience counting in the same way as equivalent experience gained in a national administration or the private sector; there is, however, no separate internal competition track for contract agents. The contract agent offer is thereby made honestly; it is employment for a defined, time-limited task, not an unspoken promise of permanency.

(¹) The test would be designed to evaluate advanced critical thinking, data literacy, and problem-solving abilities. Rather than measuring memorized knowledge, it would test candidate's mental agility, decision-making efficiency, and capacity to extract meaning from complex scenarios under strict time constraints. The test would be offered multiple times a year and a candidate could take it several times.

Should this model be adopted, a transition period would be essential to honour the reasonable expectations of those already in service. Non-permanent staff currently employed would be given a fair, time-limited opportunity to compete or establishment, under transitional arrangements distinct from the future internal competitions described above.

In addition to the above simplified recruitment model and revamped internal competitions, the following four complementary measures are proposed:

3. Recruitment based on workforce needs

The Commission should implement a continuous loop of needs-based assessments, outcomes tracking, and metrics to inform selection processes and turn them into a genuine workforce planning capability.

4. Talent attraction and retention in sites beyond Brussels

The Commission should reinforce existing thematic excellence poles and set up talent development hubs to create better mobility perspectives, while experimenting with special conditions to make sites beyond Brussels more attractive. We suggest starting with the Luxembourg site as a pilot, to honour the contractual arrangements in place.

5. Clear vacancy notices focused on a widely adopted, purpose-based value proposition for the Commission as an employer

It is important to ensure that the Commission's value proposition is honest, transparent, and includes key attractiveness points for each job profile, such as salary range, leave arrangements, and upskilling opportunities.

6. Targeted Outreach, for hard-to-recruit profiles and diverse groups

Targeted programmes like job shadowing for top university students, traineeships, and exchange programmes with Member States should be deployed to attract hard-to-recruit profiles and underrepresented groups and nationalities.

By adopting these recommendations, the Commission can create a more modern, efficient, and inclusive recruitment and selection system - one that serves the needs of both the institution and its future workforce.

Recommendations on talent acquisition

A future Commission able to deliver on its political priorities under tighter constraints needs to attract, develop and retain the best talent in Europe — including in competitive domains such as AI, cybersecurity and defence, and with a workforce that reflects the make-up of the public it serves.

The Commission still attracts strong interest as an employer, as demonstrated by the high number of applications (over 170000) to the recent AD5 graduate competition. Yet in many respects it no longer behaves as a modern recruiter: the selection system has developed organically into a complex set of often opaque pathways, with long lead times and limited adaptation to sites outside of Brussels. The inherent complexity of the current system increases the risk of procedural challenge and extends recruitment timelines. Streamlining processes while maintaining our commitment to transparent, rules-based selection would strengthen institutional performance.

Non-permanent employment is not treated as a structured period of investment, learning or testing period with a view to permanence; instead, access from non-permanent contracts to permanent posts has become fragmented and inconsistent, with internal competitions serving as an overloaded catch-all route to establishment. Workforce planning and competence foresight are not yet embedded as core managerial tasks. As constraints tighten and competence needs sharpen, the current set-up is unlikely to remain sustainable — even for mainstream recruitment. Incremental improvement of the existing system will not be enough; a structural revamp is needed.

To capture talent acquisition from the perspective of managers and various categories of staff, the workstream brought together members representing a diverse set of contracts, grades and sites. Throughout the process, individually and collectively, the workstream engaged in dialogue with all staff wishing to contribute. The group examined a wide range of inputs, including benchmarking results, best practices across mature public administrations, exchanges with the Central Staff Committee and consideration of its recommendations, the suggestions box, the staff satisfaction survey, the European Court of Auditors' reports, and discussions with other workstreams.

Several lessons emerged regarding general principles and practices of talent attraction:

- When it comes to the recruitment process itself, key conditions for successfully competing for top talent are transparency and simplicity of recruitment procedures, the time between application and offer, and the overall candidate experience. To take one example: when an employer wants to attract top talent in a specific field from the latest graduating class,

there is an imperative need to offer an attractive and simple process at the moment of graduation. After that, the best candidates have already moved on to other prospects.

- The recruitment process is the candidate's first interaction with a prospective employer and is therefore likely to be read as indicative of how they will subsequently be treated as employees or civil servants.
- There is an important link between recruitment procedures and diversity, including, in the EU context, geographical balance. The more interactive, quick, predictable, intuitive and user-friendly the selection process, the greater the likelihood that a broad and diverse range of candidates will engage.
- Employers aiming to attract top talent offer a transparent and simple, one-stop shop interface where the candidate enters data only once and can follow the process and be informed of open positions.
- For most quality employers, non-permanent contracts are a way of finding a match between applicant and employer, with an explicit prospect of permanent employment where there is a match. Thus, the explicit possibility of permanence is itself an attraction factor for accepting and performing under the non-permanent contract. This period also implies structured training and evaluation. Where, by contrast, a non-permanent contract is genuinely tied to a finite task or a funding line, quality employers are clear about its time-limited nature rather than holding out an implicit prospect of permanence.
- Recruitment and competence-based needs identification is a core managerial task on which managers are trained and evaluated in the race for talent. Investment in AI-supported tools for screening, skills assessments and workforce-needs analysis is now standard practice among comparator employers. At the same time, as AI increasingly mediates the recruitment exchange on both sides, preserving a genuine human assessment and dialogue with the candidate is becoming a distinguishing feature of a quality process.
- Inspiring leadership, early responsibility and empowerment are seen as key factors both for taking up an offer and for staying with an employer.

Against that benchmark, the Commission's current model presents the following picture:

- While there is perception of staff shortages, there is plentiful talent and competence in the current workforce.
- Considerable improvements have been made through the corporate HR strategy, EPSO's new competition model and the Commission's new recruitment model introduced 12 months ago. The results of these

important steps will need to be evaluated to determine whether they are enough to address the shortcomings we identified in the consultation of various stakeholders.

- There is clearly strong interest in working for the EU institutions, as the recent AD5 graduate competition demonstrated.
- There are, however, concerns about the institution's capacity to attract the top talent of the future, and exactly the types of profiles it needs – and to build an administration that reflects the public it serves, diverse in all respects. This applies to competitive domains such as AI, cybersecurity or defence but also to generalists. To address short term recruitment needs in the absence of successful competitions, the system has developed organically into a complex set of pathways, without a holistic and strategic approach. This implies a real risk of losing top talent who are unwilling to wait through these lengthy and unpredictable processes and who instead take up faster, more transparent job offers elsewhere.
- According to informal estimates, 85% of candidates offered permanent employment in the Commission have already worked in an EU institution or had a traineeship experience there. While this points to strong institutional commitment, it also indicates that the current system is, in practice, accessible mainly to those already inside the EU institutional ecosystem – narrowing the pool from which the Commission recruits. This creates frustration among candidates that apply to permanent competitions without prior EU experience and puts in question the usefulness of investing in outreach activities.
- In the Commission, non-permanent employment is not - at least officially - treated as an investment, learning, phasing in and/or testing period.
- There is a lack of clarity and consistency regarding access from non-permanent contracts to “internal competitions” through which colleagues may become eligible for permanent posts. Depending on factors such as the nature of the contract, the relevant budget line, or the duration of service, a colleague under a non-permanent contract may have very different - or no - possibility to enter a competition towards permanent employment. More fundamentally, internal competitions are being asked to serve two different purposes at once – stabilising various categories of fixed-term staff and allowing serving officials to advance – which makes it difficult to design any single exercise that is genuinely fit for either.
- The current recruitment set-up is primarily focused on Brussels as the place of work, with limited adaptation to other sites for legal, but also policy-related, reasons. Living costs, the perceived effect on later career mobility, and the relative attractiveness of locations create serious recruitment challenges in Luxembourg and in smaller sites such as those where the JRC operates.

- The Commission does not have a state-of-the-art systematic workforce planning building on competence-needs frameworks and recruitment or competence foresight is not yet a top priority for managers.

Contrasting these two sets of observations produces a peculiar picture. The Commission does not have the means today to behave as a modern and state-of-the-art recruiter, yet it continues to attract many applicants. Geographical balance, the under-attractiveness of sites outside Brussels, and the frustration of non-permanent staff persist as clear challenges. More importantly, in a longer-term perspective in which constraints tighten and competence needs sharpen, it is unlikely that the current system will remain sustainable, even for mainstream recruitment.

In line with its mandate, the talent acquisition workstream looked as a priority at recruitment and selection processes for both permanent and non-permanent staff, the situation of non-Brussels sites, and skills identification and evaluation. Two potential ways forward emerged from the dialogue with stakeholders and the benchmarking work: an in-depth evaluation of the current system and processes aimed at identifying incremental improvements (for example, shortening recruitment steps and hiring lead times); or to propose a complete overhaul, bringing the system closer to modern practice through a fully revamped model.

The workstream considered the incremental approach valid in principle, but unlikely on its own to deliver the results needed in the timeframe and against the constraints ahead. The problems identified above are structural rather than procedural – they concern what the system is designed to do, not only how fast it does it – and incremental adjustments would not address them. Taking advantage of the large-scale review mandate to look at the system afresh, the workstream opted for the revamped approach. The recommendations that follow set out the revamped system.

Recommendations

Our recruitment system of the future should be ahead of the curve, unlike today's system, which is broadly seen as a burden for both applicants and the institution. This will imply making some tough choices and radical shifts.

The current system is based on extensive experience and perseverance. It has had to adapt to many legal and technological challenges, and through hard work and innovative case by case solutions it has still managed to deliver an impressive cohort of talented recruits. The resulting system is, however, not sustainable for the reasons already set out above.

The recommended way forward is start afresh, based on a few key principles such as valuing on the job experience, keeping the time from application to first salary as short as possible ensuring a positive applicant experience. The system

must be readily adaptable to shifting competence needs of the institution and capable of recruiting the very best talent. Complementary measures – including enhanced workforce planning, reinforcement of the attractiveness of sites outside Brussels, and targeted outreach – are essential to support these core objectives.

Should the institution and its social partners choose to follow this path, a transitional period would be needed to respect the legitimate expectations of colleagues currently employed under the various existing contracts.

Recommendation 1: Simplified recruitment

The Commission's current selection model places the entire quality filter before entry: pass the test, join as an official. It is slow, front-loaded, and reveals little about how a candidate actually performs once inside the institution. Quality is judged on tests taken outside rather than on demonstrated contribution within.

This recommendation proposes a structural shift: make the Temporary Agent (TA) contract with a view to permanency the primary entry pathway for both generalists and specialists, with a streamlined, standardised selection process at the gate and the real quality bar built into the job itself, through structured in-service assessment over two to three years. The model aligns the Commission with the entry logic of leading international organisations (IMF, World Bank), accelerates time-to-placement, opens an underused talent pool (TA staff in EU decentralised agencies), and gives the Commission a strategic lever it does not currently possess: deliberate management of its permanent-to-fixed-term ratio.

Problem statement

The current direct-entry-to-official model is structurally misaligned with the Commission's needs:

- Quality is assessed before entry, not on the job. The institution commits to permanency on the basis of test performance rather than demonstrated contribution, producing weak signals on long-term fit.
- The pipeline is too slow to respond to specialist needs within a reasonable timeframe, leaving operational gaps that are then filled through ad hoc workarounds.
- There is no strategic lever to manage the permanent-to-fixed-term ratio, despite a fast-changing policy environment and constrained budgets that require workforce flexibility.
- Underused talent pools – notably TA staff in EU decentralised agencies and proven mid-career professionals from other organisations – face avoidable friction when moving to the Commission.

- Lists from large, infrequent competitions sit for years, decoupling selection from real-time business need.
- Contract agent recruitment operates through varied and sometimes opaque mechanisms, with CAST testing accessible only by invitation after a specific call – inconsistent with the transparency and openness expected of a Commission that aims to attract the best talent on a merit-based basis.

Proposed solution

- The Commission should move towards a model in which the primary entry pathway is a Temporary Agent (TA) contract with a view to permanency, replacing the current direct-entry-to-official model as the main pipeline.
- Entry should be governed by a streamlined selection process comprising: (i) an open-ended call; (ii) a standardised cognitive assessment, available in all 24 EU official languages; (iii) a second computerised assessment – a Situational Judgement Test and/or personality assessment, and where appropriate a specialist knowledge multiple-choice test; (iv) a provisional ranked list; (v) a placement in a DG following publication of posts. Placement operates on a matching principle. Posts are published, candidates express interest and are matched to available posts through a corporate level process involving a brief structured selection by the hiring DG. Ranked lists have a defined validity period and are replaced by rolling open calls – shorter, more frequent competitions rather than one large competition producing a list that runs for years. Candidates not immediately placed remain on the list for its defined validity period.
- Following appointment, candidates undergo a structured in-service performance assessment period of two to three years, based on annual structured assessment reports with clear, pre-defined criteria. This will be distinct from and in addition to the standard nine-month probation period. For generalists, the structural assessment may include service in more than one DG – a JPP-style rotation model is one design option that could be explored in implementation.
- At the end of the assessment period, a central Selection Board reviews all structured assessment reports, scores them against a uniform competency framework and conducts a mandatory oral testing of each candidate. Candidates who complete the assessment period within a given window are reviewed together by the Board in a defined cycle, ensuring comparability. The combined score determines whether the candidate is appointed as a permanent official.
- Those who do not meet the standard, exit at contract expiry but are not barred from reapplying through a subsequent open call. A limited extension of the TA contract – of one or two additional years – may be

granted in specific circumstances where the Commission's need and the candidate's trajectory justify it, but must not recreate indefinite temporary employment.

- The end-to-end process from open call to placement as a TA should be possible within six months. Implementation should drive the timeline down over successive cycles.
- The same selection pipeline will apply for specialist profiles. The differentiation from generalist profiles is achieved through the eligibility criteria: a domain-specific academic qualification and / or a defined number of years of sector-specific professional experience. A specialised knowledge MCQ is advisable to ensure domain knowledge.
- For genuine emergency needs – where the Commission must recruit a defined number of specialists within a very short notice – the contract agent route remains available.
- The Commission will have the flexibility to manage its permanent-to-fixed ratio. The target range is a political decision that must be made explicitly and reflected in establishment plan and budgetary planning. Indicative options could include: (a) Conservative range (70/30 to 80/20) and (b) Balanced range (50/50 to 60/40).
- The appointment of TAs as permanent officials is contingent on the availability of official posts in the establishment plan. This requires deliberate alignment between the pipeline's conversion rates and establishment plan management. The model does not assume the expansion of the establishment plan; it assumes its deliberate management in line with the Commission's strategic workforce needs.

Other key considerations:

(a) Contract Agents:

The new model creates the opportunity to modernise contract agent recruitment itself, in line with the principles of transparency and openness that underpin the TA pipeline. Two specific changes should be considered:

- All CA positions should be published openly. The current practice of filling CA positions through varied and sometimes unclear mechanisms is inconsistent with a Commission that aims to attract the best talent on a transparent and merit-based basis. Open publication of every CA vacancy aligns CA recruitment with the standards applied to the TA pipeline.
- The CAST test should be replaced with a standing, simplified assessment that any candidate can take without invitation. Under the current system, candidates must be invited to take the CAST after a specific call — a process that limits the pool from which CA appointments are made and

disadvantages candidates who do not have prior visibility within the institution. A standing test, accessible to any candidate meeting the eligibility criteria, with results valid for a defined period, would create a genuinely open pool of qualified candidates and align with the rolling open call principle of the TA pipeline.

These changes do not affect the role of contract agents within the workforce model. Contract agents remain the appropriate mechanism for time-limited, urgent, or non-establishment-plan needs. What changes is how they are recruited — making the process transparent, accessible, and consistent with the broader design principles of the new model.

(b) Centralised pool management — an optional implementation mode

Under the proposed model, candidates who succeed in the TA entry pipeline are placed directly in a hiring DG and remain there for the structural assessment period. An alternative would be to place some or all successful candidates in a central pool for the duration of the 2-3 year assessment period. Under this variant, candidates rotate across services according to need, with DG HR as the parent DG during the assessment window before final placement at the point of appointment as official.

This potential variant would have some advantages:

- maximising the visibility of in-service performance across multiple contexts
- providing a stronger evidence base for the Selection Board's final decision,
- enabling active resource allocation — talent can be directed to where it is most needed at any given moment,
- supporting mobility and resource allocation create a bridge in terms of the resource allocation.

It would however require investment in central pool management capacity and a clear governance arrangement for placement decisions.

(c) The JPP as a distinct track

The Junior Professionals Programme is retained as a parallel track within the new model — an accelerator for younger candidates without the professional experience required by the standard open call (typically less than three years). The same pipeline architecture applies: streamlined selection, TA entry, structured in-service assessment, appointment as official at the end. The JPP thus becomes the early-career version of the main pipeline rather than a separate programme operating on different logic.

Positioning the JPP as a distinct track would preserve what works in the current programme — the rotation across DGs in the first year, the structured induction,

the focus on high-potential younger candidates — while bringing it within the coherent architecture of the new model. It would also provide a recognisable entry point for candidates at the start of their careers, complementing the main pipeline which is designed for candidates with established professional experience.

Implementation

The recommendation sets a possible new direction for selections in the European Commission. The detailed legal architecture, including the precise characterisation of the structural assessment in accordance with Article 28(d) of the Staff Regulations and the language regime for each stage, will need to be worked after proper consultation and testing.

The design of the selection pipeline is delivery agnostic. The process works the same way regardless of who administers it – the Commission directly or EPSO acting on behalf of the Commission.

It can be implemented within the next 2-3 years i.e. by the end of 2028, to allow sufficient time to redesign and implement the new legal basis and manage the transition.

Recommendation 2: The new purpose and function of internal competitions

The introduction of the new TA pipeline fundamentally changes what internal competitions are for. Under the new model, all staff entering through the external pipeline follow the structural assessment route to permanency – the internal competition plays no role in that pathway. This is a significant shift in itself: it means internal competitions can be designed for what they actually are, rather than as a secondary version of the external entry process. The result is a homogeneous, clearly purposed mechanism that aligns with the merit, comparability and legal defensibility standards applied to the external pipeline ⁽²⁾.

Problem statement

As expressed above, the organic development of new pathways to respond to competence needs in the absence of successful external competitions has led to a non transparent system. This is perceived as aleatory and sometimes even discriminatory by colleagues in the system as well as actors outside.

⁽²⁾ In the transition phase, respecting the reasonable expectations of already recruited contract agents, the internal competition would still be used for CAs given the opportunity to be tested towards a permanent contract. This pathway would however be closed for CAs recruited under the new system.

Proposed solution

Redefine the internal competition mechanism around a clearly limited function and design it solely for officials seeking regrading: career portfolio model, designed for serving officials where the Commission already holds substantial in-service performance data on each candidate. Candidates present a structured career portfolio covering their record within the Commission, any relevant external experience, and demonstrated competencies against the grade profile. A selection board, including external members to guard against DG-level bias in portfolio evaluation, assesses each candidate against a uniform competency framework calibrated to the grade and scored centrally to ensure comparability across DGs. Appraisal reports are admitted as supporting evidence — they provide factual context but do not substitute for the board's independent assessment of merit. A structured oral test completes the assessment. The design is customisable: for more senior grades, the competition may be supplemented with additional elements — including a written exercise testing strategic thinking and the capacity to act at a higher level of responsibility — calibrated to what the grade genuinely requires.

- Assessment instruments should be procured from scientifically validated external providers on a framework contract basis, calibrated to the function group and grade of each competition, to ensure speed, consistency, and value for money.
- Satisfaction metrics should be built from the outset, with annual reporting to HR leadership and results used systematically to refine the model.

Implementation

The recommendation sets the direction. The detailed design including the legal basis under the Staff Regulations and the General Implementing Provisions on competitions and selection boards, will be worked out during implementation after consultation of the social partners

In line with the previous recommendation, it can be completed within the next 2-3 years i.e. by end of 2028.

Recommendation 3: Recruitment based on workforce needs

Selection is the principal lever through which the Commission shapes its workforce. Used in isolation from workforce intelligence, it becomes recruitment by assumption: competitions are designed on generic profiles rather than on the institution's identified needs, and the outcomes never inform the next cycle.

This recommendation proposes treating selection as one stage in a continuous corporate intelligence loop. A standing workforce needs assessment should drive competition design; recruitment outcomes should feed back into skills strategy and learning and development; and a standardised metrics framework should allow the institution to verify, year on year, that selection is closing the gaps it is meant to close. The Commission already has the analytical capability. What is missing is the institutional mechanism that connects it to operational selection decisions.

Problem statement

The disconnect between workforce intelligence and selection is structural, not incidental:

- Competition design proceeds on the basis of general profiles and function groups, without a systematic mechanism translating identified skills gaps into eligibility criteria, supplementary assessments and the volume and timing of calls.
- Emerging priority competencies – AI literacy, digital fluency, and other competencies the Commission has explicitly identified as critical – are not consistently reflected in what competitions test for.
- Recruitment outcomes do not feed back. There is no defined loop through which the quality and performance of recruits, once in service, informs subsequent competition design or skills strategy.
- Geographical and social balance and other elements of workforce diversity cannot be addressed without intelligence on where candidates come from and their characteristics, where they are placed, and how they progress. The data exists in fragments; it is not assembled into a deliberate intelligence function.
- There is no standing corporate workforce needs assessment that links external drivers (geopolitical and economic considerations, technological developments) and internal drivers (policy priorities, staffing and budget constraints) to recruitment planning.

Proposed solution

- The Commission should establish a formal, recurring mechanism to integrate skills gap analysis outputs into the design of open calls, eligibility criteria, and supplementary assessments - covering not only technical and transversal skills but also AI, digital literacy, and other emerging priority competencies.
- Competition planning — including the volume, timing, and profile mix of competitions — should be driven by a rolling corporate workforce needs assessment, updated at least annually, and validated by the corporate management board.
- Such corporate workforce needs assessment should cover the mid to long term. It should consider both external scenarios (geopolitical and economic considerations, technological developments) and internal aspects (policy priorities and strategic initiatives, staffing and budget constraints). It would determine the staffing gaps and needs, including the desired balance between generalists and specialist profiles, combination of staff categories, gender and geographical balance considerations.
- Recruitment outcomes — including the quality and performance of TAs during the structural assessment period — should feed back into skills strategy and competition design through a defined feedback loop. Performance data used in this feedback mechanism must comply with data protection rules.
- A satisfaction survey of recruiting services should be conducted one year after each cohort's placement, with results systematically used to refine the model.
- A standardised metrics framework — covering skills gap reduction, recruit quality as assessed by recruiting services, and time-to-placement — should be agreed and reported annually to HR leadership. This reporting should be built into the governance framework from the start, not added retrospectively

Implementation

The recommendation sets the institutional direction. Detailed governance and data architecture will be worked out during implementation, drawing on analytical capabilities the Commission already possesses.

This recommendation can be completed in the medium-term.

Recommendation 4: Talent attraction and retention in sites beyond Brussels

Problem statement

Currently, almost 11% of Commission staff is in Luxembourg, and the Commission is committed to reach the agreed Commission staffing levels specified in the seat agreement with the Luxembourg authorities. This would in practice require adding some 500 posts to the site.

At the same time, the Commission has significant problems in attracting and retaining talent to Luxembourg. On 1 May 2026, the percentage of open vacancies on the Luxembourg site was 22% higher than in Brussels. This is part of a persistent pattern, indicating that vacancies are disproportionately concentrated in Luxembourg, and therefore harder to fill. Data on ‘transardennais’ DGs, such as DIGIT, ENER, CNECT, GROW, PMO and SANTE show that these DGs have considerably higher vacancy rates in Luxembourg compared to Brussels. Profiles which have the largest share of vacancies and are hence difficult to find for AD profiles are the following: general policy officers, statistical officers and IT service officers. Finding staff for AST profiles is also problematic, particularly for the lower grades.

The problem for the attraction and retention of talent in Luxembourg is mostly linked to cost. Luxembourg has become consistently more expensive over the last years. Housing costs remain the biggest hurdle. While Luxembourg is roughly 11% more expensive in terms of consumer prices, rent is generally some 30-40% higher than in Brussels for similar premises.

This results in posts not being filled within a reasonable time, staff leaving for Brussels, or not taking up jobs in Luxembourg in the first place. Although there is no systematic overview on why candidates refuse Commission job offers in Luxembourg, the latest feedback indicates that financial (salary and the cost of living in Luxembourg) and family reasons are the most important ones. Other issues in terms of talent retention are the lack of mobility and more in general career perspectives within the Commission in Luxembourg.

While the Commission has taken, together with the Luxembourg government, some measures to address the situation (e.g. through a housing allowance for staff in the lowest paygrades), this has not led to a structural solution.

Similar challenges exist in other Commission sites, for a variety of reasons (such as low attractiveness of the location, limited schooling or professional options for spouses).

Proposed solution

The Recommendation is to **test some options with regard to staff** on the Luxembourg site within the framework of the staff regulations. Depending on specificities of other sites, the same measures could be taken in parallel or depending on the Luxembourg outcome in other sites. The experimental conditions could consist of:

- a) The creation of specialized Talent development hubs/Policy academies (Ajax model)
- b) Fast track promotions
- c) More flexibility in terms of presence on site

At the same time, the Commission should: d) Reinforce its excellence poles in thematic areas in Luxembourg (digital pole, legal pole, financial pole). Bringing staff levels up to the agreed numbers, paying particular attention these areas, will not only help to comply with the quantitative terms of the agreement between the Commission and the Luxembourg authorities but will also help to create a vibrant job market, in terms of the types of jobs on offer and opportunities for mobility.

These measures (a to d) would directly address the problems and would also make it possible to test targeted measures in a specific environment, without creating issues for the overall balance in the Commission's staff policy.

If successful, some of these measures could also be rolled out to other specific sites where the Commission has problems in attracting and retaining talent.

a) Specialized Talent development hubs/Policy academies (Ajax model)

The Commission could work on the Luxembourg site with the model of specialised Talent development hubs. This model takes its name from the football club Ajax Amsterdam that in a way functions as a training club. They have a strong focus on training young players with potential, while accepting that the talents will later move to other clubs.

In the context of the Commission, the approach of a Talent Development Hub/Policy Academy accepts natural turnover and capitalises on it. Rather than competing directly for senior profiles, (some Directorates on) the Luxembourg site would focus on identifying and developing early-career professionals, building a strong pipeline of well-trained policy experts.

This system could be piloted first in several of the policy Directorates present on the Luxembourg site (CNECT, SANTE, BUDG, EMPL).

The model would focus on attracting young and high-potential staff, both in the AD and AST grades, motivated by steep learning curves, mentoring, and mobility prospects. It would ensure that time spent in Luxembourg is seen as an investment in career progression, not a constraint. At the same time, it would also strengthen institutional continuity through systematic knowledge transfer, thus turning the current site-specific constraints into strategic advantages.

This could be linked to a supplementary allocation of posts under the JPP program for the Luxembourg site.

b) Fast track promotions

To make the Luxembourg site more attractive for young talent, faster promotions could be offered to young talents who are part of the Talent development hubs. This would compensate for the higher cost of living, without having to open the staff regulations to this end.

To address the more general problem of the high cost of living in Luxembourg, the scheme of faster promotions could be extended to all lower grade entries in Luxembourg, or to Luxembourg staff in general.

The scheme would be based on the assessment of merit, in line the staff regulations, and would rely on designing career opportunities that would result in practice in fast-track possibilities for the most meriting candidates.

c) More flexibility in terms of presence on site

Alternatively, staff with profiles that are difficult to attract because of economic realities on the Luxembourg site could be offered more flexibility in terms of how much time they have to spend on-site. This could, for example, take the form of allowing more telework from abroad, or dropping the requirement that staff live within a certain range of the workplace.

This would not affect the overall rules established for Commission staff in this respect but would create the opportunity to experiment in a specific setting.

d) Reinforcing the excellence poles in Luxembourg

While the Ajax-model accepts that talent in Luxembourg may ultimately not stay on the site, its implementation should be complemented by measures that make it more attractive for talent to stay in Luxembourg.

This can be achieved by building on and reinforcing the excellence poles in Luxembourg in areas such as digital, finance and law, where there are also further synergies with other Institutions in Luxembourg. The availability of a range of interesting jobs in these specific areas can facilitate mobility, thus ensuring that talent has a choice between moving to Brussels and staying in Luxembourg.

This means in practice strengthening the presence of the Commission by increasing the staffing levels of the services in Luxembourg active in these excellence poles and possibly moving further activities from Brussels to Luxembourg to reinforce the poles.

Implementation

This recommendation can be implemented in the medium-term. However, reinforcement of the excellence poles in Luxembourg can start immediately.

Recommendation 5: Clear vacancy notices focused on a widely adopted, purpose-based value proposition for the Commission as an employer

Employers adopting a modern view to outreach and attractiveness offer one-stop-shop job market websites which are easy to use and offer clear opportunities, underpinned by a consistent narrative – what is called an “Employer Value Proposition”. The Commission has the potential to propose an extremely attractive proposition, by offering to perspective candidate the opportunity to contribute to building the European project through the various challenges the continent is facing. Working for the Commission offers competitive salaries and working conditions, as well as the opportunity to be part of a multicultural cohort of committed professionals with a strong sense of purpose and community. Outreach efforts must make it clear to potential candidates what are the unique selling points of a job in the Commission. The Commission’s employer value proposition should be based on a narrative that is shaped collaboratively, and is known, shared and embodied by all Commission managers. It should include the key attractiveness points for each job profile in the Commission.

It also needs to be honest and transparent, indicating salary range, leave arrangements, upskilling and mobility possibilities. We should not be afraid to present the advantages of employment in the Commission for political reasons.

Problem statement

Current vacancy notices and outreach efforts are fragmented and there is no widespread agreement on the unique selling proposition of working for the Commission. The existing Employer Value Proposition developed by DG HR is not yet widely known or used. While candidates are applying in large numbers for permanent competitions, it could be questioned if most of them are doing so based on a real match with the values and the narrative that underpins the Commission’s offer.

It is important that we do not refrain from a positive description of the unique balance between good working conditions (salary, leave arrangements, pensions

etc) and a meaningful purpose. We will never be able to compete with top private sector financial packages but this combination if well expressed and combined with a slimmed down recruitment process could still attract the top talent we need.

By indicating clearly that the salary prediction and other terms such as high level of responsibility are indicative, we should stay clear of legal challenge.

Proposed solution

The Commission should focus outreach initiatives on a strong narrative centred on a purpose-based value proposition, composed of various components:

- a value proposition for the European Commission, distinct from the one of other EU institutions, based on aspirational values, building on work already initiated by DG HR. The value proposition should be defined in a participatory way and be shared/embodied by staff at all levels. The Commission's key contribution to the European project, the supportive and nurturing environment, as well as internal and interinstitutional job mobility opportunities, should figure among the unique selling points.
- a value proposition for each specific profile or profession, to be determined with the contribution of the recruiting service' senior management and underlining the unique attractiveness and characteristics of the profile. This value proposition should be specific enough to attract specialised profiles, as identified in a strategic workforce planning.

The newly developed/extended value proposition should underpin outreach efforts, including the work of staff ambassadors in promoting careers at the European Commission.

Once the value proposition is defined, it should be used systematically in all vacancy notices including the unique selling points of a job in the Commission in the profile sought.

Vacancy notices open to external candidates should be systematically published in the centralised, interinstitutional EU job market website, as well as on third-party job boards if the profiles sought are hard-to-find.

Vacancy notices should offer clarity on the salary level, working conditions, benefits, as well as the exact steps of the recruitment process and its expected duration.

Implementation

This recommendation can start to be implemented within one year from its adoption, as it builds on actions partly already kick-started by DG HR.

Recommendation 6: Targeted Outreach, for hard-to-recruit profiles and diverse groups

For job profiles which are hard to recruit and for diversity groups that keep being underrepresented, the pipeline of talent feeding into the Commission needs to be broadened. Based on the needs, targeted programmes such as job shadowing for top university students, ad hoc traineeships and short-term exchange programmes with the Member States, can help attract exactly the profiles the Commission needs and is currently struggling to hire.

Problem statement

Too often, outreach on specific non-permanent job vacancies is linked to personal networks of recruiters or individual staff or reaches a generic audience. Underrepresented groups (not only in terms of nationality, but also when it comes to diversity dimensions) stay at the margins of the recruitment efforts, in a system that perpetuates their exclusion.

Proposed solution

To increase cost-effectiveness, outreach efforts need to be strategically targeted to the profiles and demographics that are needed based on an evidence-based workforce planning. Based on the analysis of needs, the Commission should develop targeted outreach measures such as job shadowing, targeted internships, an extended Seconded National Experts program and other short-term exchange programmes with Member States' administrations. These measures will need intensive outreach and promotion to Member States administrations to ensure take-up.

Targeted measures should focus on:

- Generalist profiles, to be attracted at the beginning of their careers for example partnering with EU affairs university courses, to offer participation to targeted outreach measures to their top students. Particular focus should be given to partnerships with universities in underrepresented Member States with programs in EU affairs.
- Specialist profiles, to be attracted either at the beginning of their careers (again partnering with universities) or at expert level (e.g. with targeted

exchange programmes of limited duration). See as an example the AI traineeships of the Court of Auditors³.

These measures should aim at broadening the pipeline of talent feeding into the Commission, actively seeking the profiles needed through territorial outreach in the Member States - including at regional level, beyond the capitals. Outreach should also target diverse groups that are less represented in the organisation and that would normally not gravitate towards the Commission as an employer.

Implementation

This recommendation can be put in place in the space of 2-3 years, once the necessary partnerships with Member States and relevant universities are rolled out.

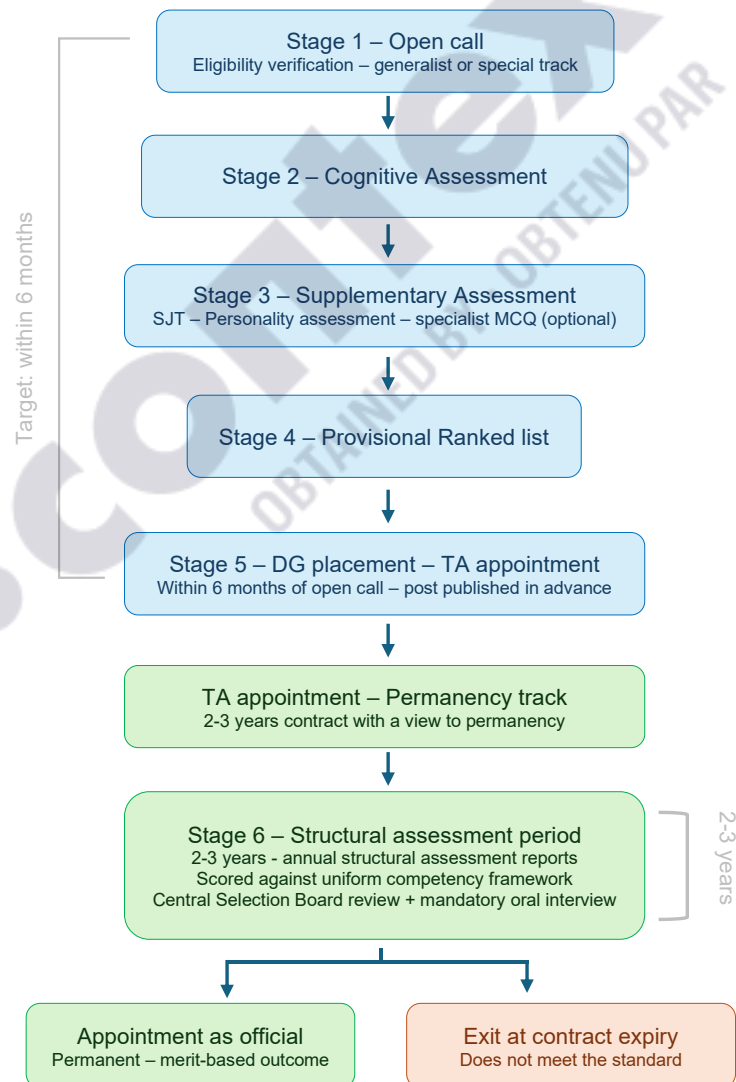
³ The European Court of Auditors offers special traineeships to recent university graduates and doctoral students in the fields of AI, computer science, data science, information technology, or similar disciplines. Successful candidates gain valuable first-hand work experience at an EU institution and contribute to projects in AI and similar areas. The monthly allowance for such traineeships is higher than for the standard ones.

Annex

Recommendation 1: Selection and Pathways Model — The New Pipeline

The diagram below sets out the end-to-end pathway from open call to appointment as a permanent official under the new model. The primary entry route is a Temporary Agent contract with a view to permanency. Demonstrated in-service performance over two to three years — not a pre-entry test — is the primary quality filter.

Stages 1–5 form the entry pipeline, completable within six months. Stage 6 is the structural assessment period, a distinct in-service mechanism culminating in a mandatory Selection Board review and oral interview.



Executive summary Careers, mobility, learning and development

Problem statement

The Commission's greatest asset is its people. To deliver for European citizens, it needs a future-proof workforce, with career paths that match colleagues' aspirations and roles where they can contribute most to the institution. Continuing crises, geopolitical volatility, technological change and budgetary pressure are reshaping what the Commission does and the skills it needs. A wave of retirements makes the challenge more acute, putting a premium on ensuring continuity and on making the best use of our experienced staff, permanent and non-permanent alike. The 2025 Staff Survey and staff suggestion box have flagged up discontent, particularly among staff in certain categories and with certain types of contracts. Left unaddressed, this can erode people's engagement. Our career system was built for different times. It needs a rethink to deliver on the challenges of our era.

For AD staff, the only route up is management, with specialised expertise often not valued enough. A person's grade may not always be aligned with their responsibilities. Middle managers must deliver on too many fronts. Colleagues in support roles have seen these functions evolve, sometime blurring their purpose. We rely ever more on excellent non-permanent colleagues who often struggle to have longer-term career prospects. Staff are not sufficiently accompanied in their professional development, both at the entry point and throughout their careers. Mobility remains too difficult. Promotion does not sufficiently recognise or reward how people really perform in their jobs. And delegations, representations and executive agencies face specific challenges, distinct from those in headquarters.

Recommendations

Our vision is a Commission where staff are proud to build rewarding careers, in an institution that offers everyone diverse and predictable career paths, in which experience and performance are valued and rewarded, independently of a person's status or contract. Where staff meet evolving needs, making the most of their expertise or acquiring new skills, and mobility is promoted. And above all, a Commission where a strong sense of service to the common European interest prevails. The result: a future-proof and resilient workforce ready to rise to Europe's challenges.

1. Diversify career paths for administrators (ADs)

1.1: Create an expert career path: parallel to the management path, with steps leading to a new 'Lead Expert' position, equivalent in status and career progression to that of a Head of Unit.

1.2. Management focused on people: give middle managers more space to lead teams; improve management appointments; build the managerial pipeline; make bottom-up feedback for managers systematic; and support Deputy Heads of Unit on their path to management.

2. High-value roles for support staff

Identify the profiles needed in support roles for the future; develop specialised career pathways towards high-value roles; and improve training and career development.

3. Better career pathways for non-permanent staff

Strengthen pathways to permanent employment, along with reclassification options and job opportunities. In the longer term, non-permanent staff to be recruited for two purposes: time-limited, defined needs; and as an entry point to European careers.

4. Ready the Commission for generational change

Develop a flexible onboarding programme for recruits, a system for the first changes of job, and dedicated fast-track schemes for high-potential staff.

5. Rewarding and making the best use of experience

Empower staff in their final working years through tailored career guidance and new early retirement options; make better use of their skills via knowledge transfer and training/mentoring roles; encourage mobility and participation in corporate initiatives.

6. Better mobility, knowledge-sharing and career progression across delegations, representations and agencies

Establish an integrated talent and mobility framework for staff moving to and from delegations, representations and agencies. Enable knowledge transfer; and modernise the rules for temporary, contract and AST staff in executive agencies.

7. Reinforce merit-based performance management

Design a more consistent framework to manage performance, with greater differentiation in career speeds according to merit and continuous feedback. Address underperformance in earnest.

8. More opportunities for mobility

Make mobility the norm every 4–6 years, support it through Commission-wide skills assessments, regular and structured mobility windows where colleagues can express interest, more cross-DG and temporary assignments, and greater managerial mobility, and recognise mobility in appraisals and career progression.

9. Streamline the learning and development offer

Cut and tailor the current learning and development offer to match institutional and staff needs, make a limited number of critical courses mandatory, and integrate upskilling and reskilling into career advancement.

Implementation

Some recommendations build on ongoing initiatives, while others propose new directions. All are designed to work within the current Staff Regulations, the boundaries of which define the level of ambition. Implementation needs to be gradual, with support and commitment at all levels, and with senior management leading by example. A Commission-wide mindset will be essential, as the benefits will be felt across the institution. The recommendations are consistent with, and often reinforce, those of other workstreams of the large-scale review, particularly in the People cluster.

Recommendations on careers, mobility, learning and development

Recommendation 1: Diversify career paths for administrators

Recommendation 1.1: Create an expert career path

Problem statement

For AD staff, the Commission offers in practice only one route to career progression: management. Beyond the limitation in grade, this constrains the ability of experts to engage directly with senior management and political leadership, and to influence decisions at that level. As a result, experts are incentivised to pursue management positions by default, even when their skills and motivations are better aligned with specialist work. This can lead to expertise being diverted away from areas where it delivers the greatest value, while placing individuals in roles that may not fully match their strengths. Those who choose to remain specialists frequently see their career progression stagnate, creating frustration and disengagement.

The current system conflates people management with expert functions. Heads of Unit are expected to lead teams while also being responsible for policy substance. As a result, they are excessively stretched across these two demanding areas.

The existing approaches to try and address this issue – via a very small number of senior expert and adviser positions – are too limited in scale and scope.

Proposed solution

- **Create an ‘Expert’ career track:** The expert track would be open to staff who want to develop expertise in a specific policy area. It would entail substantial responsibilities, including coordinating policy outputs and briefing senior management and the political level on policy. Progression would follow three stages, reflected in job titles and responsibilities - Expert, Senior (Coordinating) Expert and Lead Expert - with the Lead Expert level equivalent to and with the same possibilities for promotion as the Head of Unit.
- **Clearly define Lead Experts’ roles and responsibilities:** Lead Experts could operate within units, be attached to directorates, or possibly lead

task forces across departments, as needed. Lead Experts would be able to sign off routine policy work, e.g. standard briefings and notes but strategic decisions, such as major policy choices, would be consulted with Heads of Unit, Directors or Heads of Taskforce as appropriate. Lead Experts would participate in meetings with senior management or the Cabinet on a par with Heads of Unit. The Expert and management tracks would remain flexible, allowing staff to move between them. For example, a Senior (Coordinating) Expert could become a Lead Expert or Deputy Head of Unit; a Deputy Head of Unit could become a Head of Unit or Expert; and both Heads of Unit and Lead Experts could progress to Director or Principal Adviser. The current senior expert and adviser roles would be gradually phased out.

Implementation

The dual career track would not follow a one-size-fits-all model. Different approaches could be tested in volunteer directorates and DGs. These pilots could test models tailored to the needs and characteristics of participating departments, while some measures could be introduced immediately.

Introducing an expert career path alongside the management path would require a significant cultural shift, with greater delegation and staff empowerment. Its success would depend on everyone's willingness to change. Experts would remain embedded within organisational structures - with various options set out in the annex.

Most AD-level colleagues would continue to work in units or collaborative teams. They should be ready to move beyond traditional hierarchical structures and work flexibly under different reporting arrangements. In addition to reporting to their Head of Unit, they could work simultaneously on projects in various functional setups on a temporary and collaborative basis. They could take on roles with different profiles, including either through the management path, or through the expert career path. This approach widens career choices, allowing professional growth to be shaped in different ways. Greater empowerment would come with greater responsibility as staff take more ownership for the quality and delivery of their work.

Heads of Units should continue to translate political and DG-level priorities into team objectives and deliverables. They should empower experts and other staff more, work closely with Lead Experts on target setting, and adopt a coaching management style. Their focus should be on highlighting the bigger strategic picture, with more time for people management.

Senior management would lead by example, allowing experts, alongside middle managers, to directly brief them on substance of policy files. Likewise,

Commissioners could embrace the practice that experts take the floor to explain policy files to them for instance in regular meetings with the services or other formal meetings.

Recommendation 1.2: Management focused on people

Problem statement

The managerial career path in the Commission carries crucial responsibilities at all levels. Managers' performance and behaviour have important trickle-down effects, directly shaping the working experience and the ability of many colleagues to deliver.

The current career path for ADs conflates managerial duties and leadership with day-to-day technical responsibilities. Heads of Unit spend most of their time on policy substance at the expense of time devoted to other aspects of their work, including leading their units and managing their staff.

The role of Deputy Head of Unit varies considerably across departments, with varying degrees of involvement in management functions. Some deputies remain in this role for many years with no real prospect of progression to Head of Unit.

Management vacancies are sometimes open for long periods of time, leading to extended acting arrangements. Stepping down from a management role carries a perceived stigma. There is no mandatory mechanism for structured bottom-up feedback for managers, which could positively impact managers' performance.

Proposed solution

- **Focus middle management on the management of units and people:** Heads of Unit should set goals and milestones for their unit, translate senior management priorities into concrete objectives, oversee major deliverables and allocate resources. Rather than signing off routine documents, they should focus on outputs of political importance, assigning responsibility for the content of routine matters to the staff member in charge. Crucially, they should dedicate more time to people management through bilateral interactions, coaching and regular feedback, and by actively managing (under)performance and identifying talent.
- **Make all management appointments more effective:** introduce time-limited management assignments, which would convey the idea that it is normal to move into and out of management. Managers should be reconfirmed every five years, based on objective criteria such as appraisals and 360° feedback. It should be possible to remove underperforming managers. For recruitment, selection procedures should be faster and more predictable. For middle management, vacancy notices should be published within one month of a post becoming vacant, and

selection procedures completed within three months. Temporary (acting) arrangements should not last more than six months. To help ensure these deadlines are respected, the publication of middle management functions should be vested centrally in DG HR (as appointing authority). For senior management posts, while respecting the College's decision-making role, vacancies should likewise be published without delay and appointments completed within six to nine months.

- **Feed the managerial pipeline:** allow talented colleagues to progress faster to reach the necessary minimum grades for managerial functions through internal competitions; and publish externally vacancy notices for highly specialised managerial positions, as needed.
- **Introduce bottom-up feedback for all managers:** provide both middle and senior managers with bottom-up feedback from staff, in addition to that from their hierarchy. 360° feedback should become compulsory at regular intervals for all staff with management responsibilities, including Deputy Heads of Unit, with results transmitted to their manager so they can be taken into account in appraisals. In the case of Heads of Unit, such feedback should be an input to the appointment process and feed into the probation report before being confirmed in their post. Feedback from such exercises should also be considered in appointment processes for senior management, as part of the selection procedure.
- **Support Deputy Heads of Unit on their path to management.** Appointments should follow a formal selection procedure with an observer from another DG, and with a six-month assessment period before confirmation. Appointees should demonstrate their potential to acquire the skills and competences set out in the middle managers' competency framework. Deputies should move into a middle management post within eight years; otherwise they should be redirected to a non-management career path, such as the expert track, where appropriate. Ideally, they should complete two deputy assignments during this period to gain experience of different leadership styles and working environments. The middle management development programme could be reshaped to include mobility rotations across departments. Heads of Unit should receive guidance on how to help deputies to build their management skills.

Implementation

Implementing this recommendation would require a clear definition of the managerial and expert career tracks, including tasks and functions. Changes would also be needed to guidelines on appointment procedures, probation periods, and performance assessment, including on the time-bound nature of appointments and how they can be confirmed or republished. DG HR could rely on external consultants for the first year(s) in order to design and implement an in-house feedback mechanism for managers, with the Commission taking it over

later on so it can roll it out more widely across all types of management staff. New guidelines on the use of 360° feedback would need to be developed to ensure that it is used in a fair manner that considers the professional context, and that any substantiated concerns do lead to clear follow-up measures.

Recommendation 2: Higher-value roles for support staff

Problem statement

The Commission should equip its support staff with skills and opportunities to meet its future needs, while ensuring that their job and their responsibilities are aligned with their profiles. AST-SC and AST staff remain constrained in their professional development, as noted by the Court of Auditors in *Special Report 24/2024: EU Civil Service*, which pointed to both regulatory limits and the institution's internal decisions as factors restricting advancement. The 2025 Staff Satisfaction Survey also suggests a mismatch between the skills of many support staff and the work they perform, particularly among AST, AST-SC, and CA FG III/II colleagues. Changes in ways of working, advances in technology and automation are expected to further affect routine administrative work, making it necessary to redesign support roles. Younger, highly qualified support staff reported an even weaker alignment between their skills and job responsibilities than the average AST and AST-SC member of staff.

Proposed solution

- **Review administrative support needs** and identify the new roles that administrative support staff could play within a changing environment.
- **Develop specialised career pathways** (e.g. HR specialists, financial management specialists, etc.) for support staff through targeted reskilling and upskilling, and the creation of new role profiles and job titles. This should be accompanied by a professional programme to support individual development, offering support staff advanced training and mentoring, cross-departmental mobility, temporary assignments and project leadership roles.
- **Create high-impact roles for senior support staff**, with a particular emphasis on using staff members' experience to strengthen organisational culture and knowledge transfer, as explained in more detail in Recommendation 5 on later-stage careers.
- **Offer fair prospects for those aiming for AD roles**, who demonstrate the ability and motivation to carry out these duties. Simplifying internal competitions and standardising access to them should be considered, as well as gradually phasing out certification, which continues to be perceived as inefficient despite recent changes.

- **Consider consolidating administrative support staff into pools** supporting more than one administrative unit. This could be particularly suitable for more collaborative ways of working, to increase synergies and broaden responsibilities. It would also facilitate the coaching and onboarding of new colleagues. The size of the pool should be kept small enough to ensure the sense of belonging to a team, and to maintain the knowledge of staff, subject matter and specific processes.
- **Consider whether it is opportune to centralise the recruitment of support staff** by means of a shared resource directorate serving a cluster of DGs, or of a central office, which could allocate support staff according to DGs' needs.
- **Assess the need to recruit, primarily, permanent staff in AST-SC, AST1 and AST2 posts**, or whether these functions could be covered, to a greater extent, with temporary posts. AST-SC positions could also be considered as an entry pathway into the EU civil service for administrative support professionals. After a certain period, AST-SC officials could participate in dedicated internal competitions (in addition to the existing AST competitions already open to AST/SC staff), leading to appointment in the AST function group.

Implementation

The Commission should review administrative support functions to define the skills and profiles needed to inform recruitment, training and career development. It should map tasks and categorise them according to the impact of different ways of working and of AI. This would help design the future support model, shifting the focus from routine work to higher-value activities, such as coordination, information, knowledge management and AI oversight. It would create clear job profiles and specialised career paths (e.g. executive support, operations or digital support).

A professional development programme should be established with mentoring, mobility programmes and leadership projects. Support staff should be encouraged to take on training and mentoring roles in this programme and would be recognised accordingly.

The certification exercise would be carried out at longer intervals, or phased out completely, and regular internal competitions would offer prospects to staff wanting to move to roles with greater responsibility. Restrictions in access to internal competitions would be removed for AST and AST-SC staff with relevant qualifications and experience.

Ensuring that staff in support roles have a genuine interest in these functions will better match staff profiles and role requirements, reducing the risk of recruiting candidates who in the long term may not match a support function.

Recommendation 3: Better career pathways for non-permanent staff

Problem statement

Over the past decade, the Commission has increasingly relied on non-permanent staff to meet operational needs and compensate for the reduced number of EPSO competitions. Temporary agents (TAs) and contract agents (CAs) have become an intrinsic part of the workforce and make a significant contribution to the Commission's work. Together, they account for 36.2% of the Commission's workforce (25.8% CA and 10.4% TA, excluding agencies), and their numbers have doubled in 10 years. At the same time, the Commission expects around 3 400 retirements by 2027/2028, which makes workforce and succession planning and retention of current staff essential.

Frequent turnover weakens business continuity, institutional memory and delivery, and generates repeated recruitment, training and onboarding costs. Career prospects for non-permanent staff remain significantly less attractive than for officials: contracts and grade ceilings limit progression, internal pathways for advancement are unclear, mobility is uneven, and experience is not always sufficiently recognised. The [2024 Court of Auditors](#) report found that internal competitions are underused as a "stabilisation tool" and that eligibility conditions are often more restrictive than required by the Staff Regulations. This situation reduces fairness and has a negative effect on the retention of talent and the Commission's attractiveness as an employer.

Internal competitions, as they are currently designed and run, are resource intensive for DG HR, as well as for staff who are eligible and must invest a considerable amount of energy in preparing for them.

Proposed solution

- **Strengthen pathways from non-permanent to permanent employment:** redesign internal competitions, including simplifying them, to help retain committed colleagues with merit remaining the primary criterion. Ease the eligibility conditions for current non-permanent staff to take part in internal competitions, including by revising eligibility rules, reducing restrictive requirements where possible, and placing more value on overall professional experience, appraisal results and demonstrated performance.
- **Consider contractual and temporary positions as a stepping stone to long-term positions:** a successful TA tenure could lead, depending on performance, to an extension and ultimately, via an internal competition, to a permanent appointment, subject to quotas and budget availability. The best CAs could apply for TA positions through dedicated ad hoc selections,

thereby widening their career perspectives. Appraisal reports for contract agents should also be made mandatory from year one of their employment.

- **Career progression for CA3b:** broaden reclassification options so that CA3b staff, not only CA3a, can benefit from upward reclassification when the criteria are met and it is in the interest of the institution, particularly when contracts are renewed, subject to the availability of relevant credits.
- **Expand the opportunities for mobility:** systematically publish all CA and TA vacancies on EPSO. Allow non-permanent staff to easily access information about opportunities to move between departments and functions (same type of contract) or to apply for jobs with a different contract type (including in agencies).
- **Build on successful entry-level and development programmes.** analyse the possibility to expand programmes such as the Junior Professionals Programme to additional young and senior profiles and explore how successful participants in these programmes could move more easily into permanent roles.
- **In the longer term, recruit non-permanent staff for specific, time-limited and specialised skills needs as well as an entry point to a career in the Commission.** Conduct a global workforce needs assessment and define which functions should remain permanent for reasons of continuity and accountability, and which functions could rely on temporary staffing for specialist expertise, to meet peaks in workload or for project-based needs.

Implementation

A coordinated corporate approach led by DG HR, together with departments, would set out a workforce model, distinguishing core functions from specialist capabilities, and set common criteria for identifying which posts should normally be filled by officials and which could be assigned to non-permanent staff for a limited period.

DG HR would carry out regular competency and workforce assessments, taking experience into consideration, possibly to be launched at the start of each College mandate and reviewed periodically to identify priority skills, staffing gaps and pressure points, including retirements. Services would feed their requirements into the process, and DG HR would translate the results into proposals on recruitment, reskilling and mobility.

This approach would also help develop clearer career pathways and better recognise experience and expertise. In addition, DG HR would prepare guidance on the use of non-permanent contracts and on transitional arrangements to

progressively reduce, over the next four to five years, reliance on such staff in core non-specialist functions, while preserving continuity.

DG HR would review internal competition practices with the aim of proposing less restrictive eligibility conditions and simpler, more streamlined, assessment methods that better recognise experience and performance. DG HR would also encourage mobility and promote participation in time-limited task forces and project teams, and provide more advice on learning opportunities for all non-permanent staff. It would review programmes such as the Junior Professionals Programme and Blue Book Traineeship to assess whether their scope could be widened. DG HR would monitor evidence and feedback to track results and adjust the approach where needed.

Recommendation 4: Ready the Commission for generational change

Problem statement

The Commission faces a generational change and a complex challenge in integrating, developing and retaining staff up to the age of 35 or in the first third of their career. Current policies often treat them simply as 'new' members of staff, ignoring differences between recent graduates and experienced recruits from other sectors. This one-size-fits-all approach to onboarding, training, mobility and progression weakens individual development and organisational agility.

At the beginning of their career staff may often experience a lack of mobility, staying in one unit or department for a long time. Long first postings and limited mobility between Directorates-General make it difficult to acquire skills, develop networks and gain broader exposure. This reduces the Commission's flexibility in responding to shifting priorities or crises. Onboarding is often incomplete, lacking mandatory elements to ensure rapid operational readiness, and is insufficiently tailored to a person's prior experience.

At the same time, such staff increasingly expect meaningful work, a visible impact, shared values, access to decision-makers and a good work-life balance. The 2025 Staff Survey highlights the risk that slow progression, rigid hierarchies and too much bureaucracy may drive away talent.

Proposed solution

The Commission should create a multi-tiered programme targeting newly recruited **AD-level staff in the early stages of their Commission career**, whether officials or temporary agents, to modernise onboarding, enhance skills development and improve organisational agility.

- **Communicate a clear corporate framework for early-career development**, with structured pathways for recruits and a dedicated fast-track for high-potential staff.
- **Introduce a mandatory but flexible onboarding programme, divided into modules to reflect prior professional experience.** Core elements, including ethics, security, digital skills, document management, HR processes, emotional intelligence and participatory leadership, should be compulsory for all, but the depth, pace and format of learning should vary. Onboarding should be expanded into a structured programme, linking it explicitly to career planning, development milestones and skills-building, so that the induction of staff supports both immediate integration and longer-term progression.
- **Implement early-stage structured mobility or rotation.** A standard track should include three to four placements over the first three to four years, starting with a comprehensive induction year covering networking, digital and AI skills, institutional values and varied roles across departments. Each assignment should have terms of reference defining deliverables, and a workplace sponsor separate from the line manager, as well as review points. Host DGs and line managers should be accountable for the quality of the development experience.
- **Bring some or all newly recruited early-career staff into a flexible central pool**, allocating them to DGs during rotations according to priority needs. There should be an option to extend membership of the pool after rotation for those choosing project-based work or ongoing ad hoc assignments, freeing experienced staff for priority tasks.
- **Create an early fast-track scheme for a limited cohort of around 10 to 15% of such staff**, identified through their early performance and leadership potential, using clear criteria and a transparent process. This could take the form, in the second half of the rotation programme, of an accelerated pathway with shorter, high-impact assignments, increased mentoring, and priority access to stretch assignments such as in crisis teams or task forces.
- **Develop an additional structured fast track.** Staff who meet clear selection criteria could become eligible for internal competitions for specific roles at particular grades, for example potential Deputy Heads of Unit or Coordinating Experts at AD8 level, thereby creating a reserve list of staff potentially able to progress faster towards greater responsibility.
- **Require consistent management standards at unit level to support the development of staff.** Managers should be assessed on whether they set outcome-based goals, avoid micromanagement, encourage learning from mistakes and foster psychological safety. They should ensure personalised skills plans, regular feedback, at least one meaningful high-

impact deliverable within the first six months, structured networking, workload monitoring to support sustainable performance and regular 'big picture' briefings on overall strategy. Managers should complete training on early-career development.

- **Introduce a comprehensive mentoring system** pairing staff with a more experienced colleague from a different directorate or DG.

Implementation

DG HR would create a corporate programme for all newly recruited AD staff in early career stages, extending beyond induction and linking onboarding with career planning, skills development and the setting of clear milestones. In cooperation with departments, DG HR would create compulsory programme modules and determine how to tailor their content, pace and format for participants with different levels of experience, and would set management standards and accountability criteria.

A structured mobility system would be the backbone of the programme, enabling staff to work in different settings and functions across the organisation at an early stage of their career. DG HR would develop and introduce a transparent system based on performance, deliverables and leadership potential to identify high-potential staff, using a mixture of specific assignments and internal competition mechanisms to allow some top performers to rapidly reach more senior roles.

Recommendation 5: Rewarding and making the best use of experience

Problem statement

The Commission's workforce is ageing, and late-career challenges differ from those earlier in a career. On paper the picture is reassuring: in the latest staff survey the 50+ cohort scores broadly in line with – sometimes above – the average, and those who are 60+ often very highly. On the ground, however, specific difficulties emerge. Satisfaction with mobility is just 29% (barely above an already very low average). Sick leave rises sharply – 4.1% at 55-59 and 4.5% over 60, against an average of 3.1%. A broader question is whether the Commission capitalises on the experience of staff over the age of 50 and organises succession planning properly so that skills and institutional memory are not lost.

Mobility. Some colleagues struggle to change posts, especially into other DGs, while others are reluctant to move despite years in the same role. Some Heads of Unit prefer younger recruits, viewing experienced colleagues as less flexible, 'too senior' for a desk-officer role, or less motivated by heavy workloads and less able to learn new skills. These perceptions, however, are not universal: many

managers value experienced staff for their autonomy, expertise, institutional memory and ability to mentor.

Recognition of experience. Many colleagues reach AD 12 or AST 9, the highest non-management grades, where progression in grade plateaus (bar the few who become senior experts or senior assistants), which is a source of frustration. The system rarely makes expertise visible: a lawyer with 30 years' experience may hold the same desk-officer title as a colleague with five, and the same applies within AST roles.

Tasks and autonomy. Experienced colleagues can be frustrated by routine work (e.g. standard briefings) that underuses their expertise, and they tend to expect greater autonomy and responsibility. Left unaddressed, this frustration has a negative impact on engagement and motivation and can breed tensions.

Work-life balance. Some members of staff seek greater flexibility – in the tasks they take on and/ or their working patterns – to allow a gradual transition towards retirement.

Proposed solution

A flexible approach is needed: this cohort is large (around 25% of Commission staff) and highly varied, and many colleagues are happy. There is no one-size-fits-all solution; mandatory or quota-based approaches do not make sense. The aim is both to improve the working life of older staff and to ensure their experience and skills are put to the best use in the interest of the service.

Several concrete measures should be put in place to support this cohort of staff:

- **Empower older staff with options to successfully manage their final years at work:** Measures should include offering tailored career guidance for the later stages of their career (and training career counsellors to better support experienced colleagues, or offering more proactive support to colleagues seeking new roles later in their career). There is also a role for targeted training to ensure older colleagues can adjust to new challenges (e.g. AI, the digital environment – where the data from the Staff Survey suggests older staff are less positive than the average) and/or reskill, for example by build on existing experience but partially reorienting their interests. The Commission should also encourage active preparation for retirement with information made easily accessible and structured early engagement with pensioners' associations. A further option could be to investigate ways to allow for earlier retirement by reducing financial disincentives – at present, many do not explore these options because of the punitive financial penalties incurred. This could be interesting for some colleagues who want to return to their home country or start another career, for example.

- Ensure the Commission makes best use of the skills and expertise of older colleagues and that these are not lost when they leave:** Measures should include promoting the management and transmission of knowledge. Knowledge-related responsibilities should be made part of the job description, such as documenting key processes and expertise, or ensuring the transfer of knowledge within teams. More generally, succession planning should be taken more seriously: with the wave of retirements to come, it is essential to ensure that institutional knowledge is not lost. The Commission should also promote training and mentoring roles for experienced staff e.g. participating in selection panels for recruitment or competitions, or developing and delivering internal training programmes in their area of expertise. Pairing older and younger colleagues more systematically for mentoring purposes could be positive for both.
- Ensure the Commission as an employer offers more opportunities to older staff:** Measures should include supporting managers with specific training on managing experienced staff to make better use of experience while maintaining a constructive working environment. Facilitating mobility with more structured or 'managed' approaches, both within and between DGs, should be promoted. Possible elements could include more systematic and proactive discussions of mobility options with experienced colleagues (HR correspondents DG HR and senior management) for e.g. eight years before retirement; and organising swaps of senior colleagues between DGs in the same family. One possible tool for facilitating mobility or reskilling could be job shadowing. Measures should also include promoting participation in cross-institutional initiatives. Experienced colleagues are well placed to contribute to Commission-wide initiatives (e.g. taskforces which benefit from varied experience) or representative bodies (e.g. COPAR, EPSO competition panels) and to represent the Commission externally (e.g. in conferences).

Implementation

The proposed measures could be implemented without major structural changes. They would require more training of colleagues in DG HR's counselling services, and of HRCs and middle managers so they can better support older staff. Training modules would need to be adjusted.

Job descriptions would need to be adjusted to reflect the role of late-career staff in knowledge transmission and mentoring. New corporate guidance would encourage participation in Commission-wide initiatives. For example, when setting up new inter-departmental taskforces, it would be made clear that team members must have varied profiles, including late-career staff. Above all, a cultural shift would be needed so that managers and the organisation accept this

wider role. The possibility of introducing new rules on early retirement would need to be explored further.

Recommendation 6: Better mobility, knowledge-sharing and career progression across delegations, representations and agencies

Problem statement

Around 25% of Commission staff (8 250 of roughly 33 000) work in delegations, representations and executive agencies (EA). Of the total, 66.2% work in Brussels, 2% in representations and 11.4% outside the EU in EU delegations. The six executive agencies in Brussels account for around 10%.

The Commission has no single, inclusive career framework spanning DGs, delegations, representations and executive agencies. This prevents it from managing its staff as one talent pool, which leads to underused cross-institutional expertise and affects careers and mobility.

Experience gained in the four structures is poorly recognised. Staff going to or returning from a delegation, representation or executive agency often struggle to find posts where their expertise can be best used. That experience is also insufficiently rewarded in promotions and leadership roles.

Limited mobility between these structures reinforces silos and weakens knowledge exchange. It is held back by fears of lost career opportunities, the perception that field work is second-tier, managers' reluctance to release staff to field postings, and structural constraints on contract staff.

Finally, the rules on contract types in field assignments (TA/CA/AST) reduce agility, trap expertise in silos and limit the effective use of the workforce - particularly for policy implementation in the EAs. The main problems are restricted entry grades, slow progression and reclassification, limited access to management/responsibility roles, and constraints on the TA/CA ratio.

Proposed solution

This recommendation applies equally to representations, delegations and agencies. Each has specificities which are presented here in brief but would benefit from further analysis. More details can be found in the annex.

- **Create an integrated talent and mobility framework for delegations, representations and agencies:** a single programme or marketplace to manage staff leaving and returning to Brussels DGs in a harmonised, transparent way regardless of status. It would secure key expertise, facilitate reintegration and mobility to and from Brussels/DGs and give staff

more predictable careers. Experience gained would be translated into skills to be taken into account in recruitment, appraisal and promotion. It would include a dedicated framework for contract staff to build expertise and team-management skills across the structures, reflecting their long-term roles, and would strengthen the transitions between traineeship, interim, external/SNE, contract agent and temporary agent status to support talent acquisition. The marketplace for publishing positions should be opened for joint undertakings and decentralised agencies. *Field-to-field (horizontal) mobility* would open significant new career pathways for colleagues beyond opportunities in DGs.

For representations, it would create more structured two-way mobility with headquarters and ensure that communication, coordination and Member State-facing experience is more valued in recruitment and appraisal.

For delegations, it would give field experience (including hardship postings) greater weight in career progression, clearer pathways in and out of delegations, and offer stronger support for rotation and mobility beyond opportunities in external policy DGs.

For executive agencies, it would strengthen mobility with policy DGs, recognise programme implementation and operational skills, and offer more attractive pathways for all staff, whether officials or temporary or contract agents.

- **Establish a framework for knowledge transfer:** this would include instruments such as joint projects, temporary assignments, task forces, job shadowing, mentoring, expert communities and support during peak periods of work. It would create a more consistent institution-wide approach and better recognise cross-structural experience in career progression. Field-to-field exchange between delegations, representations and agencies would add a horizontal dimension that is not yet available.

For representations, short-term temporary exchanges would help colleagues gain frontline policy expertise and pilot transversal skills and training (e.g. political intelligence, media, citizen engagement and disinformation).

For delegations, structured short-term exchanges with headquarters would offer field exposure, pre-return networking and temporary support from headquarters during crises.

For executive agencies, structured short- and medium-term mobility with policy DGs would make it easier to move between policy and implementation and would create tools for knowledge transfer and cross-agency support.

- Modernise the rules governing CA/TA and AST staff in the agencies:**
 This would create more flexibility within available budgets and implementation needs, while remaining fully compliant with the legal framework and avoiding administrative burden. Measures could include: more entry grades for TA/CA/AST staff, improved career paths, broader access to management roles for both seconded officials and temporary agent staff, automatic regrading, more flexibility on CA/TA ratios in EAs, easier transfer across structures, more internal selections in EAs (and in the EEAS in delegations) for higher grades/groups and for AST-CA-TA transitions; and protection of pension and acquired rights where permitted.

Implementation

Implementation would be phased: a pilot of administratively straightforward measures across a few structures, then measures requiring further investigation and subsequently full roll-out.

The *talent and mobility framework* would work on two layers. The *service layer* would face hiring managers and candidates directly (e.g. a single point of contact, a shared real-time candidate register, and structured career planning) and start with a few structures. The *enabling layer* would make this work in the background (e.g. mutual recognition of selection procedures, simplified publication and selection within the pool, agreed response timeframes) and be developed progressively. More complex transfers and full roll-out to all structures should follow.

The *knowledge-transfer framework* would test simpler arrangements first (e.g. short immersion schemes and temporary assignments using contact points, common templates, clear timelines and objectives) starting with a few structures. This could include: short HQ–representation rotations to strengthen communication, stakeholder engagement, and expertise on Member State issues; short HQ–delegation exchanges, better networking before return, and temporary support during busy periods or crises; DG–agency and agency–agency rotations, and temporary support during programme peaks. These would be followed by piloting field-to-field and more complex assignments, and then full roll-out.

Modernising rules governing contract staff in agencies should begin by identifying where greater flexibility can be introduced within existing legal frameworks; changes requiring further investigation would be scheduled after. Later, measures should be applied to contract staff in representations and delegations where possible.

A joint steering group should lead implementation through a design phase, pilots and yearly reviews. Cost savings resulting from these measures should be tracked at organisational level, alongside HR workflows.

Recommendation 7: Reinforce merit-based performance management

Problem statement

Promotion is a key driver of staff motivation and career development. While the Staff Regulations support a European civil service where promotion is based on comparative merit, the current promotion system is largely shaped by an “average career” culture based on reference periods, which creates an expectation of promotion after a certain time in a grade. This has reduced the number of appeals, but at the cost of weakening the link between promotions and responsibilities and merit. This contrasts with the approach upheld by Court of Justice case law (*Case T-526/16*).

Appraisals do not facilitate differentiation between levels of performance. While appraisals and promotion are separate matters, the annual appraisal reports remain the main basis for promotion decisions. However, the reports are free format, which often leads to great variability in what managers assess and what they write, and conclude with a binary satisfactory or unsatisfactory rating. In practice, managers are often reluctant to identify low performers, especially those whose performance could be categorised as unsatisfactory, because of the administrative procedures this entails.

This contributes to a one-size-fits-all progression culture, where both fast and slow career paths remain the exception. As a result, high-performing staff are not always sufficiently recognised and rewarded, a concern also raised by the Court of Auditors (*Special Report 24/2024*). Similarly, colleagues who would benefit from additional guidance or support are often identified too late, or not at all. This is both a question of fairness and organisational effectiveness.

Proposed solution

A triple change is needed: how colleagues are identified for promotion, how to follow up, and how promotions are organised. Implementing this requires a shift in mindsets for all staff and DGs - as merit becomes the primary basis for promotion, there would be greater numbers of faster and slower careers, with the latter not associated only with cases of underperformance.

- **Redesign appraisals for more comparable assessments.** A more structured template should be designed to allow more concrete description

of performance and make it easier to compare reports. This could include mandatory reporting on how fixed objectives were achieved, supported by examples of concrete deliverables; displaying evidence of behaviours promoted at organisation level (e.g. collaborative structures); and evaluation of engagement. The current binary assessment of performance could be replaced by a wider scale to differentiate more accurately performance levels (e.g. *outstanding, strong, good, satisfactory, developing, unsatisfactory*). This should also serve to identify colleagues who would benefit from further support, including newcomers or colleagues returning from long term leave (CCP) or secondments.

- **Define promotion targets for fast careers to trigger greater differentiation of merit assessments.** The targets should apply to all DGs and be embedded in the revamped appraisal reports to incentivise more factual and honest work by the reporting officers and allow for objective discussion of merits during the promotion exercise. It should help to identify high talents and support their progression, while preserving average progression for the vast majority. This would respond to concerns about recognition and fairness and could improve motivation and retention of talent. Specific attention would be paid to identify cases with lower as well as with unsatisfactory performance, to deal with such performance levels systematically and at an early stage.
- **Implement a continuous feedback and development cycle of staff** to strengthen motivation and performance. This should entail mid-year reviews for colleagues identified through the appraisal for close follow-up, with a focus on tailored development plans. For all other staff, voluntary check-ins should be encouraged throughout the year, offering the space to discuss opportunities beyond promotion, such as mentoring, leadership programmes, specialised training, secondments and high-profile assignments. Temporary staff (TAs and CAs) should also benefit from this structured cycle in order to discuss tailored career development support. To underpin the new focus on performance management, a digital "development hub" should be rolled out ensuring continuity between feedback from managers, career development objectives and the annual appraisal process (a new *RCDR* = *Regular Career Development Review*). It would integrate mandatory 360° reviews for all managers.
- **Increase flexibility in the allocation of promotion quotas to prioritise performance and organisational needs.** Services should make widespread and consistent use of adjustment mechanisms to reward merit by expanding and systematically applying existing flexibility tools such as *cascading* and *lifts*. At corporate level, the central *top-up pool* used for individual appeals could be redesigned as a tool to reward performance across the Commission, complementing decisions made at service level. Also, at a later stage, it could be envisaged to distribute quotas more strategically across services, rather than relying primarily on seniority. For

example, a share of the total quota could be reserved centrally and then allocated to services to reflect differences in workload and evolving organisational priorities. Similarly, promotion decisions could be made more flexible by pooling promotion quotas, including unused ones, across families of DGs, compared to the current per-DG allocation.

Implementation

It would require a phased roll-out, starting with promotion quota changes followed by changes to appraisal and feedback tools in a second stage. A possible future distinction between managerial and expert careers could further support implementation. Concretely:

Targets could be set to increase the proportion of careers that are faster than the reference periods. This would automatically result in a percentage of careers that would be slower than the reference rate. Indicative targets for DGs to identify fast careers and outstanding performers would also be set.

The central top-up for appeals would be reduced significantly from 5% to 2% and the remaining 3% (or more if there is also a general taxation on all DG quotas) would be used, in the first instance, to reward services that actually differentiate performance levels in practice by meeting targets. This in turn would boost their capacity to offer more fast careers by virtue of extra quotas. In the longer term, when workforce assessment and planning is embedded, extra quotas could also be linked to priority needs or even groups of services, should the structure of the Commission change towards a more streamlined and collaborative format.

Governance of the promotions system would also be reassessed including the role of the Joint Monitoring Committee in a more performance driven system. Flexibility tools would be monitored centrally, with guidance on the use of cascading and lifts to make them more consistent and merit based.

The appraisal template would be revised with standardised tasks, a competency framework and performance flags allowing identification of both high performers and staff needing support; the latter would trigger mandatory mid-term reviews with the manager. The new template could be tested as a pilot in a batch of services.

In the longer-term, a user-friendly digital "development hub" would be introduced alongside the revised appraisal framework. It would combine real-time feedback logs (e.g. from line managers), 360° reviews, project leads or cross-unit collaborations, and career planning features, such as mobility preferences auto matched with Sysper vacancies, or skills gaps flagged for EU Learn courses or on-the-job learning. This "LinkedIn-style" portfolio would replace the current underexploited Future Development part of the appraisal reports, enabling staff to record experience, training and aspirations in a dynamic way.

Recommendation 8: More opportunities for mobility

Problem statement

Mobility benefits staff and the institution. It is essential for skills development, motivation and organisational flexibility. The overall mobility rate stood at 12.4% in 2025 (excluding management and reorganisations): staff, on average, change jobs every 5.4 years. Inter-DG mobility is considerably lower at 4%. For middle management, intra-DG mobility stood at 8.1%, and inter-DG at just 1.9% (average over 2020-2024). Mobility for contract agents and temporary agents (only permitted in the last couple of years) is limited. The average number of candidates applying for vacancies declined from 8.7 in 2017 to 4.1 in 2025, possibly because of the greater number of temporary staff. According to the 2025 Staff Survey, staff perceive that few opportunities exist, and that more transparent and structured mobility opportunities should be created.

Scarce resources may make managers reluctant to release staff. The perception that mobility is burdensome and may affect promotion prospects can lead staff to stay longer in their roles. Existing initiatives to facilitate mobility (e.g. mobility platforms for middle managers and AD staff, voluntary schemes, actions targeting newcomers and other categories of staff) are still relatively new and uptake remains low. The E-CV tool is not used systematically: only 37% of colleagues have uploaded one, limiting headhunting and job search services.

Mobility needs a renewed impetus, shifting from an administrative exercise to a strategic driver for institutional delivery and personal fulfilment, while maintaining continuity of knowledge within services. The solutions build on recent actions by DG HR in this domain, but need further cultural change and clear and consistent buy-in from all levels of management to work.

Proposed solution

The Commission's mobility policy must identify the staff and skills it needs to deliver on its political priorities and deploy them where they are most needed.

- **Communicate a clear corporate policy that regular mobility is encouraged for most staff.** This expectation should be translated into a standard: for most roles, mobility would be expected after 4-6 years. Integrate mobility into all DGs' HR planning, including by aligning local HR strategies with forecasts of mobility opportunities. Expand on current IT tools using AI to match supply with demand.
- **Establish structured bi-annual mobility windows where staff and managers express interest in DGs.** The exercise would be run by DG HR, based on a Commission-wide assessment of staff and skills needs

conducted at the start and middle of the mandate, to inform recruiting, mobility and upskilling actions.

- **Strengthen opportunities for CA and TA staff:** through more structured mobility, targeted incentives, integration into task forces and project teams, enabling rapid use of specialist expertise, systematically acknowledging it in performance evaluations and when assessing eligibility for future roles, reinforcing inclusion and professional growth.
- **Step up inter-DG middle management mobility:** enforce existing rules and guidelines around middle management mobility, including through targets. Make the initial internal-first advertisement of MM vacancies mandatory, with formal publication as a second step where no suitable existing middle manager is identified. Introduce more structured mobility discussions between Directors-General with the active support of DG HR, particularly in clusters of related DGs, to allow greater use of transfers and swaps of middle managers between DGs. Proposals for time-limited middle management assignments may open further mobility opportunities.
- **Enhance senior management mobility,** by implementing existing rules on packages of mobility decisions for approval by the College. This should take place on a regular basis to better tie in with the five-year mobility logic. Cross-DG managerial experience should in principle become a requirement for access to senior management posts, with very limited exceptions. The benefits would be stronger circulation of leadership talent, broader institutional perspective at senior level, and clearer incentives for managers to build careers that extend beyond a single DG.
- **Organise dedicated rotations of experts among clusters of DGs** to enable mobility both for staff in the expert career track and for those with specific expertise (e.g. legal, economics, HR, financial, scientific). Devote particular attention to increasing mobility between EU external and internal policy DGs, including colleagues based in representations and delegations.
- **Promote project teams, task forces, temporary assignments and secondments** tied to specific initiatives with a clear output and timeline (e.g. 6–18 months), draw staff from multiple units or DGs, define time dedication and reporting lines, empowering staff to take on new responsibility. Enable part-time assignments (e.g. 20%, 40%) and guarantee a right to return for staff where the assignment is full-time for a determined period, and recognise participation in these structures in the appraisal report.
- **Encourage mobility to national administrations, other international organisations and the private sector** (with due consideration for conflict-of-interest constraints) where it is in the interest of the service. This would

entail a better recognition of professional experiences gained during leave for personal reasons (CCP) upon return.

Implementation

DG HR would conduct a Commission-wide assessment of existing staff and skills against predicted needs at the beginning of the mandate and at mid-term. The analysis would consider priorities, planned new initiatives, emerging trends, and the continued implementation of existing policies. It would identify skills and profiles needed in DGs, including clear breakdown per staff category. DG HR would consolidate this into an overview and publish it early in the year, making it accessible to all DGs, staff and managers. For example: *'DG COMP will need X additional policy officers with a knowledge of digital services in 2027-2029'*.

This will give colleagues time to plan their next move and develop the skills they need. In early summer, a structured mobility window would open for six weeks, during which staff and managers would express interest in vacancies. Where gaps remain due to lack of applications, DG HR would contact DGs to encourage specific profiles to apply. Within clusters of thematically related DGs, DG HR would organise targeted rotations for staff with specific expertise, e.g. economists.

For middle managers, DG HR would take a clear proactive role, monitoring compliance with existing mobility rules and having the possibility to not confirm appointments where those rules have not been complied with.

Recommendation 9: Streamline the learning and development offer

Problem statement

The Commission's learning and development offer is varied, with a large number of courses across many categories. Despite this vast offering, the Staff Survey indicates low satisfaction with L&D opportunities, partially due to prioritisation of immediate tasks by both staff and managers. Maintaining such a vast offer is also complex and costly. Colleagues often struggle to find the time for training, as shown in particular by the 28% dropout rate for language courses in 2025. Managers and career guidance officers do not always have the resources to advise staff on training that could help their development. The lack of a proper rating system makes it more difficult to assess the quality, impact and cost-effectiveness of training. Interinstitutional training and alternative learning methods like coaching and job shadowing need better structuring and communication. All in all, learning and development is not sufficiently tailored to the Commission's policy priorities, career paths and upskilling needs.

Proposed solution

The Commission's learning and development policy must serve the institution's interest, guided in particular by the priorities set by the College at the start of the mandate (and revised mid-term) and the associated skill needs. Training needs to be properly planned, and once it has been agreed or authorised, it should be prioritised by staff and management.

- **Substantially streamline the current learning and development offer.**
A comprehensive review of all training courses available across platforms (EU Learn, EUSA/interinstitutional, policymaking hub, etc.) should result in a more tailored offer. It should develop metrics on learning impact, cost-effectiveness, and a rating system for trainers. The review should assess common needs across EU institutions (e.g. key competences) and determine which would benefit from further economies of scale, notably through an interinstitutional offer. Each institution could complement that offer based on specific needs. Where local needs justify this, each institution could keep its own offer and open it to others. The review should notably identify critical courses on:
 - purpose and values;
 - the Commission's political priorities;
 - career paths, aligning with expert and managerial career tracks;
 - AI in our work and Commission-wide IT applications, digital skills;
 - mentoring and coaching skills;
 - language training during working hours should be prioritised for third language requirements, wider corporate needs and the languages of the countries where staff work (language training for personal interest should be followed outside working hours).
- **Make a limited number of critical courses mandatory**, such as onboarding for newcomers, basic institutional knowledge and IT skills. A major digital upskilling programme would give all staff a foundational understanding of collaborative and communication tools, data management, artificial intelligence, cybersecurity and other relevant skills. The overall L&D offer should have two tiers: 1) a small number of core courses that all staff must complete, 2) a shorter but structured offer from which staff, guided by their management, select a defined number, including soft skills, based on their role and career path. The compulsory nature of other courses would depend on career paths. The critical courses should be reviewed yearly and updated as necessary.
- **Integrate upskilling and reskilling into career progression**, with managers and career services playing a key role in advising on learning

opportunities for future roles, including training, mentoring (including from outside the DG), continuous learning and job shadowing. The notion of learning as a skill should be widely embraced, as should the internal training of trainers. Potential in-house trainers should be identified to effectively share their knowledge. Staff who share their expertise as trainers and facilitators (on a voluntary basis) should be recognised in workload planning and appraisals. Quality should be ensured through a train-the-trainer programme, regular review of internal courses, and participating in communities of practice.

- **Create shared accountability for learning and development** between the manager, the institution and the staff member: A minimum learning time benchmark should be set and made visible in workload planning. L&D should carry stronger weight in appraisals, with managers expected to demonstrate how it progressed within their teams. Feedback from participants, managers and trainers should be used to improve the L&D framework, with a focus on effective use of acquired skills on the job. Informal and on-the-job training, mentoring and peer-to-peer exchanges should be further recognised as part of L&D. Team building activities should also be encouraged, as they are important for team spirit and cohesion.

Implementation

Implementation would start with the analysis of staff and skills needs at the beginning of the Commission's mandate. Based on the findings, a comprehensive review of the learning and development offer would investigate the impact and cost-effectiveness of existing training, as well as its alignment with the Commission's priorities and how future-proof it is. This would lead to a more focused offer, centred on critical courses - some of which would become mandatory - as well as a stronger onboarding programme to build corporate culture and shared values.

ANNEX

1. Practical aspects of implementation of Recommendation 1

The three scenarios presented below show possible (and not mutually exclusive) models for embedding Lead Experts in the organisation that could be piloted:

A. Lead Experts attached to senior management

This model suits a directorate with a diverse portfolio of policy files, where units have some synergies but typically collaborate closely with teams in other directorates and DGs. Lead Experts would sit outside the unit structure, reporting directly to the Director(s). Each Lead Expert would oversee a dedicated policy team drawn from colleagues across the directorate/DG and, where relevant, other DGs. Directorate management meetings would bring together Heads of Unit and Deputies alongside Lead Experts, complemented by bilateral meetings with senior management as needed. In some cases, Lead Experts may report directly to the DG or Deputy Directors-General.

B. Lead Experts within units

This model suits homogeneous directorates with strong synergies between units. The existing unit structure is preserved, while heads of sector and Team Leaders may become Lead or Senior/Coordinating Experts, gaining greater visibility and autonomy. One or two Lead Experts could lead dedicated task forces, composed primarily of staff from within the directorate but also colleagues from elsewhere in the DG. Directorate management meetings would include Heads of Unit, their deputies, and Lead Experts, with Senior/Coordinating Experts participating on an optional basis.

C. Central pool of experts in units with a corporate mission

Each DG defines profiles with a policy tag (new), they remain embedded in units as today but have a corporate mission (new). They are part of a central expert pool to be deployed Commission-wide to work on specific files for defined periods. Example: Adam is a cybersecurity expert based in DG A, and he is tasked with liaising across units and DGs to ensure that the cybersecurity angle is consistently reflected in policymaking. Following a cyberattack, he is temporarily seconded to a TF working to strengthen critical infrastructure resilience. Other experts in the central pool, e.g. in crisis management, public procurement, energy security, legal drafting, financial management, are also mobilised, working under a designated Lead Expert who steers the mission.

Roles and career progression within the Expert path

- **Expert:** Individuals with substantive experience, either internally or externally.
- **Senior (Coordinating) Expert:** Coordinating specific policy/action, potentially managing small teams similar to heads of sectors or team leaders.
- **Lead Expert:** Equivalent (on the policy side) to head of unit or adviser, leading expertise and coordinating broader policy domains, with task force or long-term policy team management responsibilities.

Moving from one level to the other should also be part of appraisal discussions, with Lead Experts also giving input where appropriate.

Career progression and transition between Expert and management paths

Senior/Coordinating Expert would typically be a position where staff can assess whether to pursue the expert or management path. The following transitions should be made possible:

- Senior/Coordinating expert -> Team Leader / Lead Expert
- Senior/Coordinating expert -> Deputy Head of Unit
- Deputy Head of Unit -> Head of Unit
- Deputy Head of Unit -> Lead Expert
- Lead Expert -> Head of Unit
- Head of Unit -> Lead Expert
- Lead Expert -> Director/ Principal Adviser
- Head of Unit -> Director/ Principal Adviser
- Director -> Principal Adviser

Staff who have not yet joined either the expert or management path would be able to apply for specific posts, including in management, if they meet the published eligibility criteria.

2. Practical aspects of implementation of Recommendation 6

Integrated talent and mobility framework

Field-to-field measures

A pool of experienced staff across structures should complement headquarters/parent DGs' action during crises, peaks or programme transitions; break silos through cross-structural networks; reinforce coordination and feed field experience directly into policy design; improve retention by turning field-to-

field postings into genuine career assets and reducing talent loss to external organisations; provide possibilities beyond HQ after a posting; create leadership pathways with candidates from across field structures; and integrate with fast-track, early and later career pathways.

Representations

The postings should serve as key nodes in a skills-driven mobility system for leadership and policy roles. Career tracks could follow a 3–5-year DG–representation–DG pattern, with a return role agreed before departure, with long-term posting for continuity. Promotion guidelines and vacancy notices for leadership and horizontal policy roles (e.g. SG, COMM, cross-cutting units) and for coordination and communication should list field experience as a strong asset. For critical policy and senior leadership roles, at least one field posting should be a prerequisite.

Delegations

The conditions of postings - distance from home, hardship environments, family adaptation - require dedicated support. Hardship classification (health, security, connectivity, living conditions) should feed into career weighting: staff completing mid- and high-hardship postings should receive a documented career accelerator counting towards promotion eligibility and access to management roles. Staff should have a documented role profile and grade agreed before departure, and a structured 3–6-month reintegration period on return covering coaching, networking and policy briefings. A family continuity package should cover spousal employment agreements with host countries, international organisations and embassies, as well as structural psychosocial support before departure, during posting and on return, especially for mid- and high-hardship postings.

Vacancy notices and promotion guidelines for senior leadership roles and for thematic or geographic management and policy roles at HQ should list at least one delegation posting as a strongly recommended prerequisite for roles with external relations, development, trade or security dimensions (e.g. EEAS, DG INTPA, DG MENA, DG ENEST, DG TRADE).

Executive agencies

Career tracks could follow a 3–5-year policy DG–agency–DG pattern, with a return role agreed before departure, alongside longer-term postings for programme continuity. EAs should serve as pilot environments for career management innovations before Commission-wide roll-out. Examples include: a traineeship-to-CA/TA model placing Blue Book trainees in pre-mapped CA/TA vacancies with formal skills assessment counting towards selection; recognition of other institutions' selection procedures to accelerate hiring; fast-track and rotation assignments for staff at early career stages; digital-first language training; and late-career programmes.

Promotion guidelines and vacancy notices in related policy DGs (e.g. CONNECT, GROW, RTD, etc.) should list agency experience as an asset; for senior leadership roles, one agency posting would be valued as part of the mobility experience. Leadership assignments in big sectors/teams/departments should favour a structured progression of management responsibilities, supported by mentoring programmes. When programme implementation is transferred between agencies, a standardised approach (drawing on previous transitions) should put in place a transparent marketplace for existing and new posts and enable streamlined staff transfer.

Formal framework and pathways for knowledge transfer

Field-to-field measures

These should include structured, low-complexity, recurring mechanisms that connect field structures directly, independent of HQ: bilateral field exchange rotations; cross-field thematic peer networks; horizontal surge support; pre-posting immersion in a peer structure; a field-to-field lessons-learned system; and thematic twinning between field structures.

Representations

Short immersion rotations (3–6 months) should allow policy staff to experience frontline communication and stakeholder work, while representations gain policy expertise and stronger HQ links. Representations should be used systematically as sites for developing and testing transversal skills and organisational practices, as their smaller size and faster feedback cycles suit piloting before broader roll-out. A dedicated training track for representation staff should combine political intelligence, media handling, citizen engagement and disinformation response. Fast-track and rotation programmes could use representations to develop communication skills, Member State relationship management and mentoring by Heads of Representations.

Delegations

Short immersion rotations (3–6 months) should allow HQ staff to gain field experience while helping delegation staff revitalise HQ networks ahead of a return posting. During high-intensity periods (elections, accession milestones, humanitarian crises, or peak workloads such as enlargement progress reports), support from relevant DG staff to delegations should be more regular. This would contribute to creating an expert community that would pool knowledge from delegation and Brussels-based staff, giving field staff a channel to contribute institution-wide and HQ staff an opportunity to get direct field experience.

Executive agencies

Staff in leadership roles in related DGs (including policy DGs, HR, DIGIT and central offices) with strategic responsibilities for agencies should be actively encouraged to undertake short- and long-term EA assignments. Direct exposure to programme implementation would improve decision quality and the policy-to-delivery link.

Cross-structural assignments should be formally documented and weighted in TA reclassification and CA/TA merit assessments. A formally recognised inter-agency surge support category, distinct from secondment and not requiring a new contract, should cover temporary support during peak workloads (events, grant evaluations, new policy programmes). A knowledge-transfer protocol covering job shadowing, mentoring and team handovers should apply when programme portfolios shift between or within agencies, or between DGs and EAs.

Executive summary Collaboration

Problem statement

Collegiality is a core legal principle in the European Commission, but is still not yet the norm at all levels in our organisation, even though all policy areas are interconnected to a greater extent than ever. The challenges we face today cannot be solved by any single service in isolation, but require all services across all policy domains to work together. Enhanced collaboration can also help to ensure that there is no duplication of efforts and that all policies and actions are aligned. In short, we need to move away from the siloed approach towards a collaborative approach.

The Collaboration workstream identified **six key recommendations on how to improve collaboration in the Commission**. These recommendations are built around a set of mutually reinforcing elements that together create the conditions for effective collaboration: agile structures, enabling tools and incentives, and a renewed culture of collaboration.

Recommendations

1. Make collaboration culture the norm, built on trust and empowerment

Collaboration should be promoted as a norm at all levels, with managers leading by example and empowering staff to collaborate. This should be supported by training, coaching and mobility. The lack of trust needs to be addressed in this context, as it is the most significant barrier to collaboration in the Commission; it creates resistance to openly sharing information and leads to extensive validation chains.

2. Enable flexible allocation of resources according to priorities

The Commission should function as one coherent organisation, collaborating to ensure that the knowledge and experience of its staff are used where they are most needed. To this end, it should be possible to allocate, re-allocate and share staff more flexibly according to priorities, so as to be more agile and adaptable. This should include: i) making further use of project-based teams across DGs; ii) putting in place a centrally managed pool of human resources that can be deployed flexibly across the Commission; and iii) scaling up collaborative set-ups (such as matrix working or task forces).

3. Reward collaboration and track workload

For a collaborative culture to become rooted and sustainable, it needs to be systematically recognised and rewarded. It should not be considered informal and optional. In addition, the workload of colleagues participating in collaborative projects or matrix structures should be monitored to avoid excessive workload.

4. Mainstream digital collaboration

Technology is embedded in our daily work. For collaboration to be smooth, the right tools need to be known and used in the right way across the Commission. Those tools should encourage working together through better interoperability and simplification. Training should be provided to all staff on best IT practices, and coaching should be made available for teams.

5. Enhance early strategic collaboration among Directors-General and among services

To promote a common purpose across the Commission, collaboration between Directors-General should be enhanced. To achieve this, the DGx format should be more flexible, for example to enable policy steering across DGs. Informal exchanges could be used to stimulate upstream collaboration. In addition, mobility and collaboration at senior and middle management level should be incentivised. Among services, the Commission should move from 'track changes' in interservice consultations to 'co-ownership' at all levels.

6. Strengthen effective collaboration between cabinets and services

Cabinets and services should collaborate more effectively to steer policymaking, drawing on options presented by the services, breaking organisational silos and allowing for policy adjustment in a complex environment. To achieve this, best practices should be identified in applying working arrangements between cabinets and DGs; the Jour Fixe/Steering Board formats should be reviewed from a collaboration perspective; and a record should be made of lessons learnt for project groups to build and preserve the institutional memory.

Recommendations on collaboration

Collegiality is a core legal principle in the European Commission, with the College of Commissioners acting as a unified body. While collaboration is embedded in the Treaties, it is still not always the norm at all levels in our organisation. This is a real challenge, as the environment we work in is constantly changing and all policy areas are interconnected to a greater extent than ever.

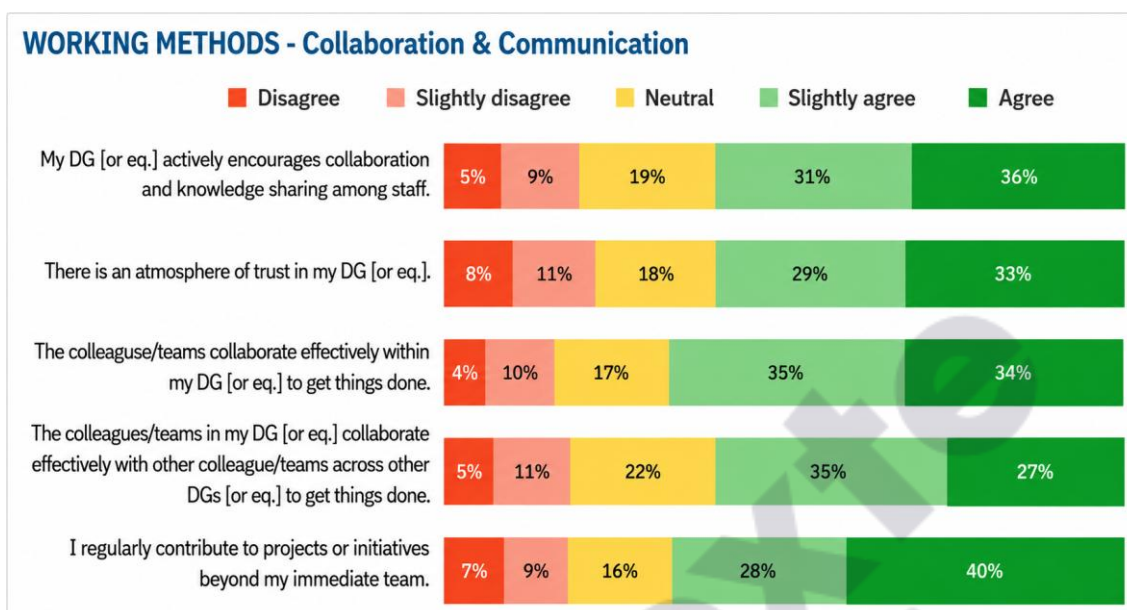
The increasingly volatile geopolitical environment demands greater collaboration within the Commission to effectively tackle multifaceted challenges, optimise resources and ensure consistency across policies and services. **The challenges we face cannot be solved by a single service.** They require all services across all policy domains to work together. Enhanced collaboration can ensure that there is no duplication of efforts and all policies and actions are aligned. Better collaboration within the Commission will help better position the Commission in interactions with other European and international institutions, Member States and other stakeholders (including citizens, businesses and civil society organisations).

Furthermore, the fast-paced technological developments (including artificial intelligence) and the generational shift in staff are essential triggers to **rethink how we collaborate within the Commission** to remain effective, relevant and able to cope with our core responsibilities with limited budgetary resources and staff. We need to move away from the siloed approach towards a collaborative approach.

By embedding collaboration as a foundational principle for the Commission, we aim to increase the resilience and the agility of the organisation. Collaboration also allows staff to feel connected to a purpose larger than their own role, fostering motivation and a sense of belonging.

Collaboration is also crucial for the effectiveness of public organisations, as is apparent from scientific research and good practices from other public organisations (LSR benchmarking exercise). However, the 2025 Staff Satisfaction Survey showed that only 44% of staff consider collaboration and teamwork to be a core principle for the institution. Furthermore, a mere 34% fully agree (35% slightly agree) that colleagues collaborate effectively *within* their DG and 27% (and 35%, respectively) that colleagues collaborate effectively *between* DGs (see **Figure 1**).

Figure 1. Key Staff Survey Findings on Collaboration (2025)



Source: [OVERVIEW Staff Survey 2025 - WORKING METHODS | Sheet - Qlik Sense](#)

The recommendations below are designed to strengthen collaboration at the Commission, but none can work in isolation. Building a more collaborative Commission requires a shift in organisational culture, which cannot depend on any single lever. Culture change happens when different aspects of an organisation such as leaders' actions (e.g. modelling collaboration), incentive systems (e.g. rewarding collaboration), and human resources strategies (e.g. training on collaboration) are jointly aligned to reinforce a specific set of values and behaviours (for reference: O'Reilly 2024). We therefore recommend adopting a systems approach: treating the following recommendations as part of an ecosystem of interdependent contributions aimed at improving the way we work together at the Commission.

The recommendations are based on assessment of existing good practices from across the Commission and beyond, including interviews with more than 20 key colleagues with relevant collaboration experiences (e.g. working in matrix structures; taskforces), a gap-analysis to identify relevant areas of action, results from the 2025 Staff Satisfaction Survey, scholarly research, as well as discussions with the High-Level Group, the Staff Committee and members of other LSR workstreams, and feedback received directly from staff.

Recommendation 1: Make collaboration culture the norm, built on trust and empowerment

Cultural change is essential to enhance collaboration, as it shapes behaviours, values and norms that support how teams interact. To make collaboration the norm, we need a culture that prioritises openness, encourages knowledge-sharing and empowers staff to contribute ideas. **Collaboration is a 'skill'**, or rather a skillset. It does not emerge spontaneously, but needs intentional effort, deliberate design and habits that are built and reinforced over time across the institution. This means that collaboration needs to be learnt by colleagues at all levels. It needs to be a continuous process to embrace and practice new ways of working together. Collaboration cannot be expected to emerge spontaneously from highly motivated and intelligent people working in proximity or from the example of a small number of inspiring leaders. It must instead become an embedded element of the culture and working vocabulary of Commission staff, a 'by default' behaviour.

Problem statement

One of the most significant barriers to collaboration in the Commission is lack of trust between colleagues, services and across hierarchical levels. This was identified by the workstream via structured interviews, the 2025 Staff Satisfaction Survey and numerous exchanges. This lack of trust creates resistance to openly sharing information and leads to extensive validation chains. The combined effect is to slow decision-making, consistently push responsibility upwards, and discourage the kind of open exchange that effective collaboration relies on. Staff need to be empowered to act within a set mandate for proper collaboration to take place.

The 2025 Staff Satisfaction Survey shows that the readiness to collaborate varies significantly across the different services, bringing a varied approach to collaboration. This is one of the reasons why some existing initiatives are not sustained over time.

Proposed solution

As a result of the above, action should be taken to:

- **Ensure mandatory training on collaboration for current staff and newcomers and an internal communication campaign** based on the '[12 principles for better collaboration](#)'. The 12 collaboration principles are grounded in what scientific research can teach us about effective collaboration. It is therefore one of the most rigorous overviews on the drivers and practices of good collaboration available at the Commission. Effective collaboration does not simply emerge by itself

by bringing together a group of intelligent and motivated colleagues. It is a skill that needs to be learnt and strategically harnessed. Today, the Commission offers training on a wide range of collaborative approaches. However, this fragments our approach across an uncoordinated set of practices and dilutes the institution's messaging around the values it seeks to promote on collaboration. Having a uniform approach to collaboration across the entire Commission will accomplish several things at once. Firstly, it will allow staff to develop a common language around collaboration across the entire organisation. Secondly, it will signal the Commission's commitment to collaboration. By making the training mandatory for all staff, the Commission acknowledges that collaboration is part of the institutional DNA and a foundational skill for all staff to learn and apply. In addition, at the time of their onboarding, new colleagues should learn key collaboration principles and tools from the outset, before other ways of working have been established. An internal communication campaign (e.g. posters; digital Intranet campaigns) on collaboration would further raise awareness among staff across the organisation.

Note on training: Training is an indispensable component of learning, and often the only way for staff to set aside focused time to acquire a new skill and expand their knowledge. However, to be effective, training requires an organisational culture that enables staff to practise and apply what they have learnt. Since collaboration is a skill (and as such needs to be learnt), training is essential for people to learn how to collaborate better, but the learning can only take hold if the surrounding culture encourages and rewards collaborative behaviour. A training course can show people what good collaboration looks like; whether they actually adopt it depends on whether their day-to-day working environment lets them practice it and rewards them for doing so. To maximise its effectiveness, training should therefore be combined with other initiatives sustaining and supporting collaborative ways of working across the Commission (see the introductory note to these recommendations).

- **Encourage essential coaching on collaboration for managers and teams** to support the training and internalise it in practice. Coaches should focus on supporting managers in applying the principles of collaboration that they have learnt from courses in their day-to-day work. This ensures that the new skills acquired become a habit, rather than being a one-time event for managers and their teams.
- **Recognise management's crucial role in implementing culture change.** Leaders should develop skills to ensure that collaboration is consistent, supported across the organisation and recognised as a positive contribution. **Collaboration should be included in the Competency Framework not only for middle managers but also for senior managers.** In particular, middle and senior managers should lead by example by modelling collaborative behaviour, demonstrating that teamwork, openness and mutual

respect contribute to success. This should also be considered in the appraisal reports for middle and senior managers. Furthermore, managers need to recognise and support colleagues to ensure effective collaboration. Managers also need to address in a timely manner behaviours that undermine collaboration and trust, and 'walk the talk' by collaborating themselves (Gartner White Paper on 'Motivators and mindset shift'). Staff also need to be empowered to act within a set mandate for proper collaboration to take place.

- **Incentivise mobility through staff rotation and exchange programmes**, by providing newcomers and existing staff, including middle and senior managers, the opportunity to experience different DGs. A new mobility programme could build on lessons learnt from existing good practices (e.g. Junior Professionals Programme rotations, the recently established mobility platform by DG HR, Staff Exchange Programme between the Commission and Agencies, JRC's and DG COMP's Short-Term Exchange Programme and others). Having a structured approach to allow staff to experience other DGs would increase trust and establish a common corporate culture nurturing collaboration across services.

Implementation

As a first step, the 12 principles of collaboration should be actively promoted to all staff through a dedicated internal communication campaign, including sharing them throughout the relevant Commission networks (e.g. HRC etc.), articles in DGs local IntraComm etc. Pilot training on the topic is already being organised and should be further encouraged. These courses, in combination with management buy-in and coaching, are crucial for the required culture change to take place.

Overview of the Twelve Principles of Good Collaboration

This is a high-level summary meant to give a broad overview on the principles. For a much more comprehensive take and practical tips on how to implement them, please see the website [here](#).

#	Principle	Core idea
1	Stop collaborating ... until you have a plan	Bad collaboration is sometimes more wasteful and exhausting than no collaboration at all. Rather than more collaboration, we need better collaboration. While teams can outsmart individuals on a large variety of tasks, collective intelligence does not emerge spontaneously: it is the result of deliberate process design. Virtually any process is better than jumping into work right away without a plan. Even a small amount of preparation can go a long way.
2	Agree on the problem before rushing to solutions	It is surprisingly common for teams to jump to finding solutions before agreeing on what the underlying problem and the overarching goal are. Missing this crucial step often leads to unwelcome surprises and wasted effort later in the process. A lot of work may have been done, only to find out that people have wildly different views on the issue, forcing them to go back to the drawing board.
3	Work out loud in one shared space	The success of collective intelligence depends on teams exchanging relevant knowledge. However, excessive notifications, running in parallel on different communication channels, can be overwhelming. Structured communication is essential to ensure that knowledge flows seamlessly without becoming overwhelming.
4	Get different people into the team	Diversity is an essential part of collective intelligence – diverse groups can address complex problems from a variety of angles. However, diversity comes in many shapes and sizes. Try to have a diverse team to incorporate a wide range of perspectives and approaches to problem-solving. Consider involving colleagues with different experiences (e.g. age, gender, educational background, country of origin), who might spot something you have all missed.

5	Give the devil his due – listen to dissenting voices	Diversity also means broadening the range of ideas discussed within the team. If everyone in a room thinks alike on a given issue, this can mean either that the team has hit upon an indisputable truth, or it is missing something important. To avoid that, ensure that you encourage and thoroughly address dissenting opinions. Any organisation needs not only to gather insights from everyone in the room but also consider the perspectives of stakeholders and the public. This is especially important in democracies, where the goal is to address diverse views and values, not just those within the organisation, which may be biased. Bringing in diverse perspectives reduces the risk of 'groupthink', where the drive for internal consensus and conformity of opinions prevents us from looking at the issue from outside our 'bubble'.
6	Challenge what people say, not who they are	Diversity entails some degree of disagreement and, at times, conflict. There are two main kinds of conflict that can arise at work: task conflicts and relationship conflicts. The former refers to clashes of ideas, the latter to interpersonal frictions. Research shows that clashes of ideas often improve collaboration, while interpersonal conflicts always damage it. Especially early on in a project, a respectful clash of opinions can foster a better understanding of issues and options, promote the generation of ideas, and lead to better decisions.
7	Make sure everyone feels they can say what they really think	Diversity of views and opinions will only be expressed in a psychologically safe environment. Psychological safety means that everyone feels comfortable to voice their ideas, provide honest feedback, and take the risk to suggest innovative solutions, even if they might be wrong.
8	Put yourself in other people's shoes	Diversity requires a greater effort to understand other viewpoints. Empathy is the glue of collective intelligence. The more people are capable of understanding others around them, the more intelligent the group as a whole is. Empathy is a skill that can be learnt and improved. It involves actively listening to other people and the ability to put oneself in another person's shoes. Empathy can immunise the team against several collaboration no-go's, such as

		misinterpreting other people's views and negative stereotyping.
9	Dare to trust first	Trust is the cornerstone of effective collaboration: it fosters openness, encourages the sharing of feedback, and enables constructive problem-solving. Building trust requires intentional effort, particularly in the early stages of a project, and must be anchored to a sense of shared identity where group members feel part of one team striving towards a common goal.
10	Intellectual humility pays off	People tend to express their beliefs and opinions as if they are absolutely certain of them, even if they are not. Acknowledging some degree of uncertainty about your beliefs out loud and not being afraid to express ignorance improves the efficiency and quality of consensus-building and facilitates rethinking.
11	Hack your meetings	Time for meetings is the scarcest resource for many colleagues, with scheduling becoming a major challenge. Some of the most important collaborations take place in meetings, so it is even more important that they are optimised. Rather than just scheduling another hour-long call, it is important to plan your meetings the right way.
12	Working together means also working apart	Collaboration does not mean working together all the time. What we do independently is also vital to collective intelligence. Unfortunately, we have an 'always-on' culture of back-to-back meetings, chains of emails, and instant notifications on top of our competing priorities. The brain has limited capacity for regulating our attention, switching between tasks and controlling our impulses. We therefore must carve out time for individual deep focus, with minimal distractions – time devoted to deep work. When we are able to strike a balance between thinking apart and thinking together, collective intelligence thrives.

Recommendation 2: Enable flexible allocation of resources according to priorities

Collaboration enables Commission services to be more agile and adapt better to changing circumstances and unexpected challenges. This requires a thorough discussion on how resources are allocated to specific tasks/projects within the Commission.

Problem statement

The Commission's policy challenges increasingly cut across portfolios, yet the Commission's workforce remains organised primarily along DG lines. DGs continue to operate along 'portfolio logic' that privileges loyalty to the home DG over the Commission as a whole. Resources are also becoming scarce, as the Commission is operating under a stable staffing principle, whereby new resources can only be allocated for a certain task or project if they are taken from another service. In practice, each year each DG has to contribute 1% of its establishment plan posts to a redeployment pool. The Commission, based on the proposal of the Corporate Management Board, reallocates resources to the DGs based on priorities. These resources are sometimes allocated to a new collaborative project (e.g. task force, project team) which allows the new structure to flexibly acquire the necessary expertise (e.g. via a call for expression of interest) from within the Commission or hire external expertise. The pool of posts based on the 1% rule applied across the Commission is not considered sufficient to cover all the needs, and does not create a systemic change that would foster collaboration.

Collaborative structures are not yet common or easy to set up. Project teams across DGs and units with clear mandates and light governance have not yet been mainstreamed. Matrix working across DGs is not yet a standard practice; formal and informal teams and taskforces are not recognised institutionally, and staff and resources cannot move flexibly across silos when collaboration is needed (Sytych et al., 2026). The choice of structures should be deliberate and purposeful, rather than the result of inertia. A catalogue of formal and informal agile structures exists. It includes task forces, project teams, matrix structures in DGs, etc. and should be updated as a point of reference (Reference '[Flexible Structures in the Commission: A Manager's Guide](#)'). However, lessons learnt and good practices from collaborative projects are rarely systematically recorded and applied to subsequent tasks and mainly rely on the personal experience of colleagues.

Proposed solution

The Commission should function as one coherent organisation, collaborating to ensure that the knowledge and experiences of its staff are used where they are most needed. For this, it should be possible to allocate and re-allocate staff more flexibly, according to priorities. As a result of the above, action should be taken to:

- **Make further use of project-based teams across DGs.** When a workstream requires subject-matter knowledge from different services, the Commission should normalise the deployment of cross-DG, time-bound project teams (including staff at all levels) with clear mandates. Senior management should **visibly and consistently endorse cross-DG collaboration**. Senior management should set the scope and purpose of the project mandate according to political priorities to ensure that objectives are aligned and all project members are working in the same direction. Steering mechanisms should be established at services level, such as escalation discussions at middle management and senior management level, and also with the relevant cabinets, such as ad hoc discussions or formal Steering Board mechanisms. For effective implementation, the duration of the project should also be indicated. Governance principles and validation chains should also be agreed pre-emptively. Project team members should be able to report to their project leader, while also remaining in contact with their home DG to make sure that policy lines are consistent. In addition, **all task forces around high-priority policy files should be given a dedicated budgetary line**. This would allow the task force to operate with relative autonomy and reduce excessive dependency on the partner DGs, which can act as frictions to its work. **Budget is the primary lever** - linking budget distribution to cross-cutting priorities is the most powerful mechanism for driving collaboration and breaking down silos.
- **Put in place a centrally managed pool of human resources, deployable flexibly across the Commission and 'free agents' to deploy based on needs.** The Commission should enable staff to express their interest and join a dedicated pool of human resources with an appetite for challenge and a disposition for problem-solving. Members would be regularly given fixed-term assignments to dedicated teams and DGs working on high-priority and urgent files. DGs would bid to host these staff, and the Secretariat-General would vet the bids to produce a yearly list of teams and projects eligible for this programme. This would ensure that resources flow to the parts of the organisation that need them most. Members could decide how long to opt for such assignments and could go back and forth to more 'traditional' type of assignments. Programmes with similar aims have been tested elsewhere with encouraging results. The Canadian administration has experimented with the 'Free Agents' system, with

employees deployed flexibly across various ministries for a limited period to support teams across various parts of the administration (see OECD background document developed for this workstream). The European External Action Service also deploys a system of ‘floaters’. Employees (in this case specifically, contract agents) applying for this programme are assigned to work for a limited period in any part of the organisation that would need their support. Exchanges with colleagues supervising the programme have described it as generally very useful and effective.

- **Scale up collaborative set-ups with proven track-record** (matrix working, task forces). A matrix setup allows for structured collaboration with a more flexible allocation of resources, where colleagues can contribute to different thematic and operational files. Matrix structures work particularly well in DGs where files and projects are similar or interchangeable. This is already the case in DGs where the rules applied are similar (e.g. DG COMP, SG REFORM, SJ), but also in DGs which manage country knowledge across policy priorities (e.g. DG REGIO). A matrix structure contributes to an efficient allocation of staff, provides a strong incentive to collaborate (many projects ensure that managers are contributing and receiving staff) and ensures a high level of staff satisfaction. The 2025 Staff Satisfaction Survey on matrix work showed that there are big differences in i) how encouraging DGs are about collaboration and knowledge-sharing and ii) whether colleagues perceive that they collaborate effectively. A good model of an inter-DG task force is the time-bound task force created for the initial preparation for the implementation of the Social Climate Fund with DG EMPL, CLIMA and SG REFORM leading on the guidance to geographical units and Member States. To learn from the experiences of others, **light and practical step-by-step guides** should be drawn up by DG HR for choosing and setting up collaborative structures, including a clear definition of the group objectives and timeline: selecting participants based on skills and competences, assessing that the right people are around the table. (Gartner White Paper on Motivators and Mindset Shift). The option of deploying and expanding collaborative structures should be systematically integrated in senior managers’ decision-making about policy/programme delivery modes and related resources, for example when delivering on cross-cutting priorities, mobilising talent and skills on topics of common interest, or enhancing country knowledge across DGs. The publication in IntraComm of a Guide describing different collaborative methods, together with information on which method is most suitable in what circumstances, could also include contact persons to share recent experiences, thereby ensuring that knowledge on collaboration is shared between services.

- **Encourage self-managed systems within DGs.** The Commission should allow for informal, DG-internal processes whereby procedures are established for senior and middle managers, in consultation with staff, to meet and share resources based on skills and business needs for specific time-bounded projects/deliverables.

Modifying organisation charts should be easier than today to allow for maximal flexibility. Another option is that senior management of the DG may encourage this form of collaboration by indicating a certain percentage of time which could be allocated to this kind of projects (cf. 20% agile scheme in JRC).

- **Introduce a Skills Catalogue** to facilitate re-allocation of staff. The catalogue would capture staff expertise at all levels, including substantive knowledge, working methods and staff proficiency in key collaboration tools. It could be integrated within the existing Who's Who and directly connected to EU Learn, automatically updating staff profiles with completed training and newly acquired skills.

Implementation

All these actions, except for the 'free agents' and the Skills Catalogue, are already being implemented, but have not yet been generalised. DG HR and SG, together with relevant Directors-General, should have a central role for broader implementation.

Recommendation 3: Reward collaboration and track workload

In order to make a collaborative culture a sustainable way of working, it needs to be rewarded. Without rewards, collaboration will remain at best invisible, or even considered negatively by the line manager. It is therefore important for collaboration to be recognised by the organisation and managers. This can be done through informal recognition (e.g. messages to all staff from the top hierarchy congratulating individual colleagues on their collaborative achievements personally and publicly) and through more formal mechanisms, including making collaboration visible across the organisation and taking it into account in appraisals, appointments and promotions.

In most cases, collaboration is still considered an activity beyond the regular work of staff. This approach disincentivises collaboration, as it is sometimes difficult for staff to manage their workload and they might be penalised in their promotions due to their participation in workstreams beyond the remit of their unit/Directorate.

Proposed solution

For the collaborative culture to be sustainable, it needs to be systematically recognised and rewarded. It should not be considered informal and optional. As a result of the above, action should be taken to:

- **Make collaboration visible** via leadership endorsement, organisation charts (e.g. following the example of DG COMP's organisation chart, where dotted lines indicate working collaboration outside hierarchical structures), IntraComm, House meetings, etc. Changing mindsets requires deliberate behavioural signals from the organisation and managers. There is ample evidence showing that employee recognition and non-financial rewards such as public recognition of a colleague's work can have a meaningful impact on workplace performance (Barends et al., 2022). In addition, survey data from practitioners suggests that recognition from leaders and senior leaders specifically may have a particularly long-lasting effect on motivation (Marrs, 2026). Taken together, this points to recognition as a way to model and reinforce the behaviours an organisation wants to see. Applied to collaboration, it underscores the role leaders can play in visibly encouraging and rewarding good examples of people working well together.
- **Highlight collaboration in appraisal reports.** This would include adding a specific section on collaboration to appraisal reports and ensuring that contributions across DGs are visible in Sysper, as well as making it possible for more than one manager, whether from the same DG or not, (matrix, project teams) to automatically provide input. This approach would require fixing dialogue meetings with more than one manager at the same time. The work of staff who have worked in cross-DG projects should be fully acknowledged. Team achievements should also be acknowledged in the appraisals, rather than just individual performance.
- **Reward collaboration in promotions**, not only collaboration within a unit, Directorate or DG, but also cross-entity. This is particularly relevant for managers, as they tend to have a sizeable impact on the ability of their teams to collaborate effectively. Managers who model openness, shared ownership and resource flexibility enable cooperation; those who prioritise territorial control undermine it. Collaborative capacity should therefore be treated as a core leadership requirement. As a concrete action, we advise HR correspondents (HRCs) in each DG to regularly survey staff perceptions of middle and senior management support for cross-boundary work and use the results as a structured input into management dialogue when results appear to be consistently low.
- **Monitor workload**, for example through a combination of a simple traffic-light system and managerial check-ins. This would ensure: i) that working for multiple managers does not lead to an excessive workload and, ii) that managers can re-distribute tasks to staff according to identified workload. The system should be applied within each DG, but also across DGs with the involvement of relevant senior and middle managers in cases where colleagues are working for several project teams.

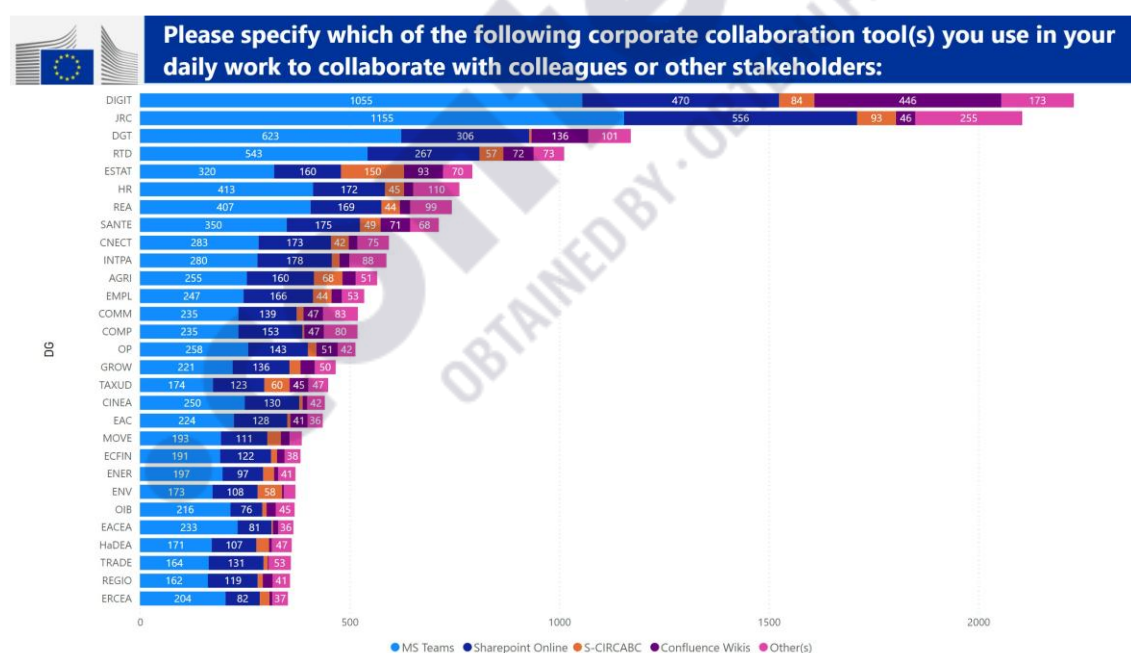
Implementation

Existing collaborative structures could easily be made more visible. The appraisal and promotion system could be improved to better reward collaboration by DG HR for the next appraisal cycle. Workload monitoring could be set up by the different project teams, based on existing practices (DG COMP, SG REFORM).

Recommendation 4: Mainstream digital collaboration

Digital tools can support collaborative behaviour by making it easier for people to **communicate, coordinate, co-create and build trust**. However, the Annual IT Survey highlights existing differences across services both in their adoption and the way they are used (**Figure 2**). At the same time, the Commission's use of digital collaboration tools is fragmented, as shown by the 2024 Skills Mapping Exercise. Rules on usage can be improved, while knowledge management is not implemented consistently and the use of AI in collaboration could be better embedded.

Figure 2. Cross-DGs variations in the use of collaboration tools



Source: [IT Survey 2025-Analysis - Power BI](#)

The proposed response is to standardise and raise the maturity of the use of tools and templates across the Commission, improve interoperability and data sharing, strengthen training and local coaching, improve the quality of knowledge management and search, and accelerate implementation through stronger central steering.

Problem statement

Common platforms that are currently used, such as SharePoint Online or MS Teams, are not the norm at all levels of collaboration (including interservice consultations). This leads to duplication of channels, as was apparent from the results of the recent 2026 IT Survey. Colleagues do not follow the same principles on access, versioning and commenting, while templates in processes supporting collaboration are limited. There is no active knowledge management that ensures that key information that would support better collaboration is up to date and accessible. Additionally, the organisation has not set any clear targets on digital literacy to be met, and overall accountability is lacking. AI is not used to its full potential to allow for more strategic, creative work while ensuring that all processes remain human-led. At the same time, some middle and senior managers are not aware of digital best practices and do not actively reinforce their ownership and use.

Proposed solution

As a result of the above, action should be taken to:

- **Simplify and clarify the use of collaboration tools**; it needs to be clear what tool to use for what purpose, how to use it and where to look for support:
 - Create and enforce a Commission-wide 'tool map' for most common use cases (e.g. co-drafting, document storage, meeting notes, communities of practice), with one default tool/template and process per use case and linked with a corporate knowledge management policy. Their purpose would be to reuse, for each new file, collaboration and sharing practices from past examples.
 - Guide staff in using innovative tools for collaboration with short 'do/don't' lists and chatbots that allow easy access to processes, templates and other needed information on how to use these tools.
 - New or important updates of collaboration tools can only be launched after an analysis of existing ones, which must take into account the impact on users and avoid overlaps. To assure resilience and control on our data and tools, fallback solutions should be available.
 - Keep track of the most urgent problems raised by DGs, then focus release cycles on fixing them rather than continuously adding new features.
 - Make system ownership and related parameters visible inside the tools themselves (e.g. 'About this workspace' page with owner, retention rules, request links) and ensure staff onboarding materials explain where to find this information.

- Enforce interoperability for all collaboration tools: data in one tool should be accessible from other tools. The Publications Office is already working on defining a set of corporate vocabularies: their scope and usage should be further expanded and become the default option, with proper governance structures put in place.
- **Sharing of knowledge and data** in a structured and transparent way is crucial for collaboration to be efficient. It can also help facilitate heavy administrative processes:
 - Use the EC Data Catalogue as the default entry point for main data assets in Commission exchanges, with a common metadata pack for each asset (e.g. owner, topic, related files/initiatives) to support sharing, transparency and quick fitness checks.
 - Use the Catalogue as the central hub for data governance across the Commission, in an AI-ready and user-friendly way. Create curated, reusable knowledge sets for priority topics, each with a designated curator responsible for quality and updates. This will improve knowledge-sharing and make data and knowledge assets AI-ready for reuse across services.
 - Introduce smart dashboards and KPIs in the SPP cycle's data, accessible by Commission services, supporting cross-services collaboration with up-to-date information on strategic objectives.
 - Make the European Commission's data AI-ready, which requires clear data ownership and stewardship, with a shared mindset that treats data as a strategic asset.
- **Provide mandatory training on best IT practices for common use cases** to all staff, including management:
 - Make mandatory baseline training part of onboarding and annual or bi-annual refreshers, centred on practical scenarios (co-authoring, permissions, versioning, meeting-to-notes, task follow-up, information classification). Train managers and staff on tool functionalities that can help to make meetings shorter and more efficient.
 - Require managers to complete an additional module on 'leading by example' (how to embrace innovation and handle technology changes within teams, including in connection with rewarding staff).
 - Use a 'collaboration tools passport' to record and demonstrate staff proficiency in key collaboration tools, while helping units identify gaps without heavy administrative burden. Measure regularly the progress for tool uptake and skills development and address DGs that fall behind the targets.
- **Provide coaching for teams** to agree and establish the digital collaboration principles:

- o Establish a network of Digital Collaboration Local Champions, who should be given a clear and well-described mandate with managerial support and targets to act locally. With their support, the adoption and usage of collaboration tools across the Commission should be monitored. Targeted action will be taken when needed.
- o Set up a network of coaches (building on or working closely with the Digital Collaboration Local Champions) who can, upon request, help teams at the start of a project. This help could take the form of a short 60-90 minute session where the team agrees which tools to use, basic rules (naming, access rights), how files will be organised, how decisions will be recorded and how co-drafting will happen.
- o Give teams a simple 'team charter' template and a ready-made workspace set up with these choices.

Implementation

Currently, there are structures implementing some of the related changes. The M365 interservice core team is coordinated by DG DIGIT, working under the umbrella of the Centre for Organisational Transformation and reporting to the Information Management Steering Board. The core team should be expanded to cover all the areas proposed above. The measurements and the accountability of uptake should be improved and strengthened.

Recommendation 5: Enhance early strategic collaboration among Directors-General and among services

Today's varied challenges and cross-cutting policy objectives warrant enhanced strategic steering and joint work across Commission departments. In this vein, the Directors-General have a key role in policy development and implementation and in managing the work of services. Their high-level steering can directly foster effective collaboration within and across services, including by promoting flexible organisational set-ups (temporary or institutionalised). The formats in which Directors-General meet and work together should be conducive to trust-based collaboration at services level. Such dynamics need to be honed, as they do not emerge solely from formalised systems.

Problem statement

The established DGx format for regular meetings of Directors-General is not optimal for fostering upstream policy steering. For example, the agenda and discussions are often retrospective, revolving around what has been adopted/communicated by the Commission, and based on presentations rather than substantial exchanges. The interviews conducted by this LSR workstream confirmed this gap, highlighting that Directors-General would benefit from ampler and more frequent use of flexible meeting formats conducive to upstream collaboration. In their turn, Deputy Directors-General lack structured formats for gathering and collaboration.

The gaps in upstream collaboration are exacerbated by the increasing share of political sensitive initiatives (PSI) among total ISCs. This share went from 2.6% in 2019 to 5.5% 2025, with the average deadline for PSIs continuously becoming shorter, going from 10.06 days in 2017 to 4.48 days in 2025.

The lack of periodical checkpoints to share updates with management and the political level, combined with very limited upstream collaboration between Directors-General, makes it difficult to avoid a very formalised system based on a 'track changes' culture.

Proposed solution

Collaboration among Directors-General can be enhanced by unlocking the potential of structured dialogue and networking formats. As a result of the above, action should be taken to:

- **Make the DGx format more flexible** to enable tailored policy steering. The weekly DGx meetings should foster participatory approaches, be more flexible and focus less on presentations of adopted initiatives. Instead, the meetings should be more forward looking to enable

tailored policy steering and to steer anticipatory discussions on policy and resources planning across DGs, underpinned by the Commission Work Programme, as has recently been done. In addition, Directors-General should make more use of meeting formats structured along functional lines, by clusters and families, e.g. among policy development and policy delivery / funding DGs (both under direct and shared management) or among external relations DGs. These formats enable upstream alignment of objectives on policy substance, joint stocktaking of policy delivery, and can stimulate setting up collaborative structures from the start of policy initiatives to ensure more efficient delivery.

- Furthermore, **seminars at DG level** could dive deeper into track records of matrices, task forces and project teams and further inspire the way the services are organised and work together. This is instrumental for scaling up collaborative set-ups. The seminars can also serve to align vision, expectations and delivery milestones related to transformative process such as AI-driven administration, as well as to discuss and steer work on forthcoming policy initiatives.
- **Use simple, informal exchanges** stimulating upstream collaboration. Beyond DGx format, the Commission should balance formal exchanges with more simple, informal formats such as leadership coffees, working lunches to bring together DGs and stimulate upstream collaboration in policy making and for cross-cutting matters. These informal exchanges could be triggered by the SG, but also by relevant Directors-General or Deputy Directors-General. Additionally, such formats have the inherent advantage of strengthening trust and personal relationships, which can only benefit work between services. Networks of DDGs and Directors should be further exploited as they are at the frontier between policy coordination and more operational delivery. These informal exchanges will support the smooth implementation of formal processes.
- **Increase the transparency and predictability of policy initiatives** to support collaboration at services level. This could be done by SG, extending College 'liste de points prévus' to files due for adoption beyond the current 2 to 3 months timeline. This would allow collective thinking and discussion DGs upstream before ISCs, possibly reducing the number of fast-track interservice consultations.
- **Incentivise and promote the mobility of senior and middle managers** across the Commission. Adjusting the incentives systems for senior managers. Limiting the mandate of a DG can stimulate engagement and collaboration during the tenure.
- **Move from 'track changes' to 'co-ownership'**, supported by structured, accountable co-drafting at all levels. Put an end to the culture of promoting 'track changes' in documents in interservice consultation to highlight divergent political and policy objectives and views. Instead, promote cooperation and upstream collaboration in shaping policy work and drafting, to enhance trust and adherence to common objectives. Core

groups starting the drafting of documents should only include core participants; when relevant, a broader range of services should be regularly consulted. This process would allow a smooth formal adoption in Decide.

Implementation

Most recommendations can be implemented in the relatively short term. Recent seminars and ad hoc meetings at DGx level are already implementing some elements of the recommendations and such practices should be reinforced by SG and the DGs network. A dedicated participatory workshop for Directors-General on how better collaboration could be implemented would be necessary. SG would also be instrumental in revisiting DGx formats and increasing the predictability of policy initiatives, while HR should revisit mobility of senior and middle managers, also drawing on recently introduced changes (notably for middle management).

Recommendation 6: Strengthen effective collaboration between cabinets and services

The constantly evolving policy landscape and the need for agile governance demand more effective collaboration between cabinets and services. Well-structured and fluid collaboration between the political and technical level can ensure timely steering on policy development, adequate feedback loops and agile decision-making, especially in rapidly evolving circumstances. Both cabinets and services have the responsibility to build a trusted, structured and well-functioning collaboration, including across relevant policy domains by breaking silos.

Problem statement

Structural barriers hamper the effectiveness of the dialogue between cabinets and services. The surveys conducted by this LSR workstream, echoed by Staff Survey findings, point to the perceived opacity and rigidity of established meeting formats such as Jour Fixe and of information and validation chains (hierarchical). An overall limited presence and engagement of colleagues from services in relation to cabinets gives staff the perception of being disconnected/not listened by political hierarchies and exacerbates the culture of track changes downstream.

Proposed solution

To address the varied and complex current and future challenges, collaboration must be systematically integrated in political steering and in policy making. Cabinets and services should collaborate more effectively to steer policy making, break organisational silos and allow for policy adjustment in a complex environment. As a result of the above, action should be taken to:

- **Identify and promote best practices in applying working arrangements** between cabinets and DGs, including for relevant DGs and SG within policy clusters. Continuing the good practice of preparing written working arrangements framing the collaboration not only between a given cabinet and the relevant DG, but also between cabinets and with relevant services for specific files, beyond collaboration on ISCs. Ensuring the flexibility to respond to changing needs. Ensuring that working arrangements allow more interaction between cabinets and technical level (units) outside Jour Fixe format, as this is beneficial to clarify political expectations, substantiate policy work and provide feedback loops.
- **Ensure Jour Fixe/Steering Board formats are reviewed from a collaboration perspective.** Using extended Jour Fixe/Steering Board formats between cabinets and DGs to provide political steering not only to the relevant DG under a specific cabinet, but also to project teams and task forces. Meetings between the cabinets and the services should take place on a regular basis, although not necessarily at EVP/Commissioner level, to provide direct political steering and validation of services' work. In some instances, it would be appropriate to allow policy officers to attend Jour Fixe meetings. On topics of shared interest and cross-cutting key political files, the participation of colleagues from other relevant DGs in Jour Fixe and cabinet-services meetings should become the rule, not the exception. Stepping up early political steering, based on options presented by the services, and involving all relevant DGs on files of key political importance before technical work on policy design starts. This can set the tone on collaboration among services and cabinets in subsequent processes, breaking silos and distributing effort in a clearer and more predictable way.
- **Ensure a clear and specific lessons learnt process for project groups** (or political initiatives that are launched and then phased out), to preserve institutional memory and incorporate good practices in subsequent projects. This can be done by means of surveys, interviews or collective feedback sessions, to allow project group members to identify what worked and what did not work well during the operation of the format (e.g. [Developing a blueprint for cross-sector project cooperation inside the Commission](#)).

Implementation

In the short run, during the tenure of this College, the Secretariat-General could identify and promote best practices and review existing arrangements between cabinets and services to better cater for collaboration. Likewise, SG could help collect and encode repositories of lessons learnt from project groups and political initiatives, including those launched and implemented by the current College with a view to improving future arrangements.

Annex: List of references

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Executive summary Directorates-General

Problem statement

The Commission has demonstrated that it is strong in crisis situations, when rigid structures and engrained ways of working give way to dynamic collaborative efforts, achieving the best possible outcome for Europe. In these moments, the Commission shows what it is capable of, but it should not take a crisis to force us to reexamine our organisational system and culture. A Commission leveraging all of its capabilities for clear common missions, working together in agile structures, with efficient and effective central and support services, can deliver even more for Europe and Europeans. Structural change alone cannot deliver without a culture of cooperation and an agile use of resources, but can be an important catalyst to achieving full potential. The EU is continually facing new geopolitical, technological, economic and political realities. In this complex environment, the Commission needs to be able to respond and adapt rapidly, flexibly and efficiently, to address the constantly evolving needs of the Union and its citizens.

First, the Commission's organisational structure needs to be ready to meet the challenges of a volatile policy landscape in line with global and EU challenges, such as defence, security (e.g., hybrid threats, economic and energy security), competitiveness, climate change, technological innovation and sovereignty, enlargement, or threats to EU cohesion and democracy.

Second, a coherent and policy-driven programming mechanism and implementation structure should ensure the optimal allocation of scarce financial resources, leveraging the flexibility built into the future budget. Enabling a smooth and efficient implementation of the next multiannual financial framework (MFF) with streamlined, simpler and more flexible programmes is a key driver for structural change.

Third, the Commission must become more agile. It increasingly faces complex challenges cutting across traditional policy boundaries, and stretching beyond and across individual Directorates-General (DGs). The combination of new tasks and scarce resources demands that the Commission become more reactive and flexible in allocating resources to the most pressing needs.

In summary, the Commission needs to promote a more coordinated, effective and collective action to be fully capable to propose, promote and respond to face its missions: ensuring European economic strength and autonomy, taking care of and sustainably exploiting the EU common goods, providing security and protection, promoting its people and securing their fundamental rights, EU values and way of life, interacting with the rest of the world, building and consolidating alliances and remaining a key reference on the world stage.

Recommendations

1. Adapting the Commission structure to new realities

The Commission structure should be reviewed, empowering it to act efficiently and decisively in the European interest. This review should look at what can be described as the three main layers of Commission action, with a “Policy DGs pole” where families of DGs jointly deliver on a number of core policy missions; a “programming and implementation pole” in charge of a strong budget delivery covering budgetary, financial and programming functions fully aligned with the next MFF; and a “Central and support functions pole” enhancing policy coordination, corporate management and providing common support services. Across families of DGs, duplications hamper work, costing precious, scarce resources, and are therefore to be screened and systematically avoided.

2. A coherent programming and implementation capability for the new MFF

To maximise the potential benefits of the proposed future MFF, the Commission structure needs to ensure coherent negotiation, programming and implementation mechanisms for the three main pillars, the National and Regional Partnership Plans (NRPP), for competitiveness spending (notably the European Competitiveness Fund, Horizon Europe and the European Innovation Fund) as well as for the external action programmes (Global Europe). In each of these areas, a programming and implementation entity is needed to coordinate between all concerned departments, including central services, and to ensure the use of the funds is in line with the overall policy steer.

3. Commission policy work structured along missions

The Commission has clearly defined priorities. Empowering staff to jointly pursue common goals cutting across individual policy boundaries allows the Commission to bring its full force to bear on these priorities, which are defined by mega-trends and new global challenges. To optimise the delivery through enhanced cooperation, avoid duplication and allow for staff allocation flexibility, the activities of the DGs could be reorganised around a limited number of coherent and well identified policy missions. These benefits could be triggered by either enhanced collaboration or structural changes, or a combination of both. The more agile the overall structure, the less pressing is the need for far-reaching structural changes.

4. Agile central and support services to efficiently support Commission objectives

Given resource constraints and the increased need for swift reaction and policy coordination, central and support services must also become more agile, and adapt to the changing environment. For the central services, the recommendations of this report could lead to targeted structural adjustments. The implementation of LSR workstream recommendations on “Service model” - which considers the best ways to deliver amongst others HR, security, logistic, digital and linguistic services for the institution(s) – could also have structural implications. Additionally, a strong centre/team must be empowered to drive the implementation of the LSR recommendations. This could be embedded in one of the central services, but it must be a centre for innovation, ready to drive transformation, and support the change process.

5. Establish a dynamic and reactive “fix it” function for more agile and operational responses

With a view to making the Commission more reactive, and giving it the capacity to develop concrete and operational solutions to emerging issues, a new ‘fix it’ function could be established. Its rational would be twofold: first, to regularly stress test the status quo against possible risk scenarios, new opportunities and threats, and derive policy, political and organisational responses; and second, to organise a small reactive in-house team, able to design, coordinate and steer an efficient response to specific issues. This function would have the ability to engage across the Commission, with a clear mandate and the capacity to mobilise and rely on all resources from the Commission (human, expertise, budgetary, regulatory). Its objective would be to steer actions and responses, and ensure a smooth handover of the implementation to the relevant DGs.

6. A people centred approach to transformation

Any structural and organisational change needs to fully integrate the human dimension, with transparent communication channels and a sense of ownership by staff. The process should be inclusive, listening to, supporting and accompanying staff concerned by the changes. New structures need to be lean and agile, grounded on solid and evolving expertise. This requires the ability to recruit and retain the right profiles and competences, and provide the necessary skilling and reskilling support. The recommendations of the LSR workstreams belonging to the “people and culture” cluster should be fully reflected in the process, not the least to foster a strong culture of cross-structural cooperation to jointly and efficiently pursue common missions.

Recommendations on Directorates-General

The Commission of the future needs to be prepared to take on rapidly evolving challenges. Its structure needs to address the priorities of today and tomorrow, with greater agility to adjust to emerging new tasks and priorities, not least in the crisis situations we have experienced frequently during the last decade.

It means that the overall structure of the Commission should undergo a “health check”/“stress test” to examine how its current structure can best tackle (i) the new, volatile political landscape – for example the fact that security and preparedness issues or the challenge of the economic security are increasingly shaping the agenda of the Union, (ii) the implementation of the new MFF framework, or (iii) the increased role of AI which will have a profound impact on our policies and way of working.

Projecting the European Commission into an organisation geared towards the future is a necessity and an opportunity which stems from three drivers.

Driver 1: Alignment with a new policy framework

This driver refers to the necessary adaptation of the Commission in the context of some “mega trends” that affect the objectives or the working methods of the institutions.

The new policy landscape is evolving in line with global challenges, such as defence, security (hybrid threats, economic security), competitiveness, climate change, technological sovereignty and innovation, enlargement or threats to EU cohesion and democracy.

Our framework has developed towards a more top-down/centralised institutional governance – starting with the role of the EUCO – and this requires a stronger alignment between the internal and external policies of the Union, and increased agility when more frequent and quicker political arbitrages between increasingly interlinked policies are required.

Finally, there is a need to better enable, beyond the core function of the Commission as a regulator within the EU, a more operational response capacity. Indeed, recent crises illustrate that the Commission should be able to mobilise resources quickly and develop and deploy capacities together with Member States in a “Team Europe” spirit, to deliver, in very short term, European solutions on the ground.

Driver 2: Alignment with the next MFF

Enabling a smooth and efficient implementation of the next MFF with streamlined, simpler and more flexible programmes is a key driver for structural change and the achievement of our priorities.

There is a need to render the Commission structures fit for purpose as regards the future National and Regional Partnership Plans (NRPP) and to ensure coherent programming and implementation mechanisms for competitiveness spending (notably the European Competitiveness Fund, Horizon Europe and the European Innovation Fund) as well as for the external action programmes (Global Europe).

The bold structure of the budget and its programmes must also be reflected in the organisation of the Commission, or there is a risk that the benefits of the proposal will be lost. One important element in this regard is to define a coherent and policy driven programming mechanism for each programme, notably taking into account the enhanced flexibility in the future programmes. The objective is to make sure that our financial means are used as leverage to best achieve our objectives.

Driver 3: Agility & Effectiveness

Given the increasing volatility of the policy landscape, the Commission should be able to adapt faster to changing needs, with engrained flexibility.

This challenge encompasses several dimensions: preparing both the structure and the staff in terms of working culture and skills for a more “modular” approach, which is able to react fast, drawing on flexibility within one or several DGs, without necessarily creating the need for new structures.

A more agile and efficient organisation will require rethinking structures across all parts of the institution, providing an opportunity to look at possible duplications which have developed over time or at the best balance between centralised versus decentralised functions, hierarchic versus flatter approach, central services versus policy services, and the efficient organisation of support functions as resources will remain scarce while tasks increase.

The intention of the following recommendations is not about changing for the sake of changes. It is about adjusting the structures to the new reality of our policies and of our institutional and technological environment where there are inadequacies and inefficiencies.

Recommendation 1: Adapting the Commission structure to new realities

The Commission structure should be reviewed, empowering it to act efficiently and decisively in the European interest. This review should look at what can be described as the three main layers of Commission action, with a “Policy DGs pole” where families of DGs jointly deliver on a number of policy missions; a “programming and implementation pole” in charge of a strong budget delivery covering budgetary, financial and programming functions fully aligned with the next MFF; and a “Central and support functions pole” enhancing policy coordination, corporate management and providing common support services. Across families of DGs, duplications hamper work, costing precious, scarce resources, and are therefore to be screened and systematically avoided.

Problem statement

The Commission structure of today reflects a traditional *modus operandi*. The organisational structure of the Commission services needs to be adapted to new evolutive tasks that have been entrusted to the institution in order to be prepared to respond to the priorities of tomorrow, and to meet the expectations of the citizens.

Business as usual is not an option, and the Commission’s organisational structure should be reviewed to allow for swift decision-making and arbitrage and to enhance the ability to react rapidly to emerging priorities, be it in terms of policy response, operational action or funding needs, both at EU level and on the global stage. Some structures are also lacking critical mass, implying disproportionate overheads and mobility rigidities for the staff.

New tasks and challenges cutting across individual DGs, as well as duplication of action and responsibility, can result in inconsistent approaches, internal disagreements spilling into incoherent outside action, delays in decision-making, and an allocation of resources ill adjusted to the real current needs.

Proposed solution

The adjustment of the Commission structure should be designed by taking into account the need to respond to the main drivers identified.

- Key elements which should be considered in the process of review include:
 - (i) the need to reflect the common missions of the institution, beyond individual DGs;
 - (ii) strengthening the ability of the EU to assert its geopolitical stance and defend its interest;
 - (iii) the ability of the institution to respond to the priorities of today and tomorrow; and
 - (iv) the need to better respond to citizens’ expectations,

- From an internal perspective, the adjustments should be guided by the following objectives: (i) strengthening the common sense of purpose; (ii) adapting the dimension of any structure to reflect its mandate; (iii) delivering a modern organisation with leaner structures, flatter hierarchies, and which avoids duplication of functions; (iv) empowering staff to be mobile across DGs; and (v) ensuring a people-centred approach to transformation.

An adjustment of the organisational structure alone cannot address the need to respond to the drivers identified and make the Commission fit-for-purpose for the next MFF and beyond. The participation of all staff to project-based work, and the ability to adapt to emerging priorities are fundamental for the Commission to succeed in leading by example in modernising its civil service.

Implementation

There is more than one way to address the identified need for change. The timing and extent of necessary structural change also depends on how far the Commission succeeds in improving agile cooperation across DG boundaries in its internal processes. The more agile the overall structure, the less pressing is the need for far-reaching structural changes.

Implementation can occur over several steps, starting with the most urgent changes needed for the next MFF and for ensuring efficiency and quick delivery of the new programmes. The implementation of more fundamental structural change can be done at a later stage, for instance to take effect at the start of the next College mandate.

Recommendation 2: A coherent programming and implementation capability for the new MFF

To maximise the potential benefits of the proposed future MFF, the Commission structure needs to ensure coherent negotiation, programming and implementation mechanisms for the three main pillars, the National and Regional Partnership Plans (NRPP), for competitiveness spending (notably the European Competitiveness Fund, Horizon Europe and the European Innovation Fund) as well as for the external action programmes (Global Europe). In each of these areas, a programming and implementation entity is needed to coordinate between all concerned departments, including central services, and to ensure the use of the funds is in line with the overall policy steer.

Problem statement

The bold structure of the MFF proposal and its programmes must be reflected in the organisation of the Commission, or there is a risk that the benefits of the proposal will be lost.

Where individual DGs consider themselves as “owners” of specific funds, actions or even programmes, without due consideration of the broader focus and optimisation of spending needs in line with key Commission-wide policy objectives, the increased flexibility under the new MFF will not be delivered efficiently, and scarce financial resources cannot optimally support ambitious policy objectives.

Proposed solution

For each of the three main pillars, a programming and implementation entity should be created.

The key functions of such an entity should be:

- to provide analytical capacity to allow for and prepare political arbitration on programming priorities. It is also required to ensure clear competencies and a clear mandate for negotiations;
- to translate political priorities into negotiations and programming choices, assess trade-offs between objectives and instruments, and prepare decisions on allocation, reallocation and sequencing of resources;
- to coordinate the implementation of the programme.

To ensure that the funding programmes best serve the policy objectives of the Union, the coordinating entities should be assigned the role of preparing issues for political arbitration, acting as an “honest broker”, and ultimately preparing sound collegial decisions.

Once the programming is established, a different approach could be considered depending on the management mode – shared, direct or indirect – for the implementation of the actions:

- For a performance based programme like the NRPP, the coordination function should also cover the implementation which is intrinsically linked to the monitoring of the national plans themselves,
- For programmes under other management modes, the relevant policy DGs would retain a significant role in implementation, including through delegation to executive agencies.

The LSR workstream recommendations on “Financial management” and “Offices and Agencies” should also be considered.

The audit and assurance functions could also be structured in various ways:

- bundling audit functions for all management modes into one single entity,
- organising the work separately for shared (performance based), direct, and indirect management to take into account the specificity of the audit work and keep the function closer to the authorising officer function.

Various options exist as to how to design and where to locate these programming and implementation entities, either as self-standing structures or within existing DGs. Depending on these choices, the impact on existing DGs will have to be assessed and fully taken into consideration for defining their future organisation and for ensuring that they will continue to have the capacities to manage legacy programmes.

Implementation

Implementation is urgent, as the architecture of the main MFF pillars has now been supported by Council, and Member States and regions need clear partners to prepare for the take-up of the new programmes on 1 January 2028. At the same time, legacy programmes under the current and previous MFF will require considerable implementation efforts in the first years of the next MFF and beyond.

This complexity could be addressed by pursuing an incremental approach to the implementation of change. A first step could be increased coordination via agile structures, leading to more structural solutions in the medium term.

Recommendation 3: Commission policy work structured along missions

The Commission has clearly defined priorities. Empowering staff to jointly pursue common goals cutting across individual policy boundaries allows the Commission to bring its full force to bear on these priorities, which are defined by mega-trends and new global challenges. To optimise the delivery through enhanced cooperation, avoid duplication and allow for staff allocation flexibility, the activities of the DGs could be reorganised around a limited number of coherent and well identified policy missions. These benefits could be triggered by either enhanced collaboration or structural changes, or a combination of both. The more agile the overall structure, the less pressing is the need for far-reaching structural changes.

Problem statement

Both the pursuit of Commission policies and the principle of collegiality presuppose that Commission DGs and services work together smoothly, in a results-oriented manner.

There are limits to redeploying resources effectively to address new, or more pressing needs. New policies (i.e. preparedness, economic security) are by nature cross-DG and require a broad set of expertise. However, often under pressure of time, DGs prioritise delivering on their own initiatives and responsibilities. This can come at the expense of a more collaborative approach, where DGs support initiatives led by others rather than focusing only on their core business.

As a result, policy objectives are sometimes pursued without considering the impact on other parts of the Commission's mission, resulting in inefficient measures or duplication of activities through mirroring functions.

Proposed solution

Cooperation across Directorates-General boundaries needs to improve and policy objectives need to be seen and owned as common Commission-wide objectives, pursued in agile structures using all tools and policies available. While progress also depends on enhancing collaboration (see LSR workstream recommendations on "Collaboration"), overcoming silos and fully enabling the Commission to act in the common European interest also requires reviewing Commission structures.

Beyond the approach and logic stemming from Recommendation 2, the Commission's organisation could be gradually re-structured around a limited number of coherent and well defined policy missions. Based on the Commission priorities for this mandate, the following five missions could offer orientation and inform a political decision:

- Ensure European economic strength and autonomy, forge the EU economic policies e.g. on trade, supply chains, customs, technology, research, Single Market enforcement, competition, financial markets and regional policy into a strategic force to boost the EU's economic competitiveness, sovereignty and single market.
- Sustainable use and development of European common goods, aligning policies on land and oceans, food, energy and transport systems, environment and climate, to the need for sovereign and sustainable supplies and an efficient use of resources and energy, with trade-offs recognised and managed through coherent common choices.

- Provide security and protection, developing the capacity to coherently and swiftly address the rapidly evolving, intensifying challenges related to hybrid attacks (physical and cyber), internal security, border protection, defence readiness and preparedness.
- Empower people and secure fundamental rights and EU values; pursue policies with a direct connection to the citizens (education, housing, employment) across all EU territories; foster an open and engaged communication with citizens, promote the rule of law and democratic values across the Union, and beyond its borders.
- Promote Europe globally and build alliances, maximising the strategic impact of EU investments and policies abroad, ensuring they support general EU objectives, protect EU interests, and build durable alliances.

This would be an opportunity to redirect resources and clarify processes toward well identified missions, create synergies, screen and avoid duplication, and allow for more flexible allocation of resources to political priorities for each mission. Efficiency gains could be created through grouping of DGs, the creation of shared services or agile structures achieving cross-DG objectives and by screening possible duplications (e.g. country teams, international units in non-RELEX DGs, general horizontal/mirroring units).

This exercise could trigger short term readjustments between DGs but could also imply deeper readjustments, in a timeframe consistent with the preparation of the mandate of the next Commission. It should be emphasised that the scope of this report, in accordance with the mandate given to the workstream, covers the Commission structure and does not extend to interinstitutional organisations or the European External Action Service.

Implementation

Implementation will differ by families of DG and by policy mission. In some areas, the impact of the MFF related change of structure could be an opportunity for a deeper restructuring, in other areas evolving global challenges may be a driver. In the longer run, implementation could include more structural and cultural changes.

Recommendation 4: Agile Central services to efficiently support Commission objectives

Given resource constraints and the increased need for swift reaction and policy coordination, central and support services must also become more agile, and adapt to the changing environment. For the central services, the recommendations of this report could lead to targeted structural adjustments. The implementation of LSR workstream recommendations on “Service model” - which considers the best ways to deliver HR, security, logistic, digital and linguistic services for the institution(s) – could also have structural implications. Additionally, a strong centre/team must be empowered to drive the implementation of the LSR recommendations. This could be embedded in one of the central services, but it must be a centre for innovation, ready to drive transformation, and support the change process.

Problem statement

Central and support services fulfil a very wide range of functions, some of which are inherently political whereas others require a great degree of specialised technical expertise.

The functions to be performed *inter alia* aim at:

- Guaranteeing the sound preparation and functioning of the College, i.e. providing policy coordination, legal accuracy and scientific evidence to support informed and coherent decision making and explain the actions and achievements of the institution to the general public;
- Ensuring that corporate management is efficient and that resources - human, financial, ICT or logistical - are assigned according to need;
- Providing linguistic services respecting the diversity of the Union, making full use of the modernisation potential offered by technological development and seeking interinstitutional solutions;
- Finally, further departments of horizontal nature and responsibilities could be relied upon for dedicated support functions, benefiting all DGs.

Given a persistent scarcity in resources while faced with new policy priorities and tasks, central services must ensure their in-house efficiency and smooth cooperation between them. This makes them trusted, reliable partners (‘navigators’) and puts them in a position to redirect resources to new Commission priorities where required. The increasing capabilities of AI provide a challenge and opportunity to release resources and improve the services provided.

The LSR recommendations can be implemented only if a strong central coordination function exists. It needs to ensure coherence and mutual reinforcement between the five missions, between the three main MFF pillars, as well as between funding and policy work, including between internal and external policy dimensions.

Proposed solution

To unlock the full potential of central and support services, the missions and structures of central and also support services should be adjusted in a targeted manner to achieve the following objectives:

- Ensure that a single central coordination function exists to ensure coherence and mutual reinforcement between the five missions, between the three MFF pillars, as well as between funding and policy work, including between internal and external policy dimensions;
- Explore the impact of other LSR workstream recommendations notably on “Service model” on the structures such as the linguistic, IT and Human Resources services, as well as on workstreams on processes;
- Leverage the potential of AI by establishing AI native structures freed from legacy constraints. Such sandbox structures should be considered for instance regarding the enforcement of the *acquis* (infringement procedures, complaints handling) or single market barriers (e-commerce, technical barriers to the single market management);
- Enhance the use of our internal scientific excellence to bring even greater added value to policy development and better support the regulatory work of policy DGs. This advice should not lead to additional expenditure for policy Directorates-General;

Implementation

As with the previous recommendations, the implementation of change in the central and support services can be taken in steps. However, as a matter of urgency, the entity to follow the implementation of the LSR should be identified.

The integration of the AI aspects should be implemented as an early step, identifying the processes which can be a starting point for harnessing this technology, in coherence with the recommendations of the workstream on Innovation and AI. Changes in structures deriving from the review of service delivery could be considered in a later step.

Recommendation 5: Establish a dynamic and reactive “fix it” function for more agile and operational responses

With a view to making the Commission more reactive, and giving it the capacity to develop concrete and operational solutions to emerging issues, a new ‘Fix it’ function could be established. Its rationale would be twofold: first, to regularly stress test the status quo in different policy areas or for internal processes against possible scenarios, new opportunities and threats, and derive policy, political and organisational responses; and second, to organise a small reactive in-house team able to design, coordinate and steer an efficient response to specific issues. This function would have the ability to engage across the Commission, with a clear mandate and the capacity to mobilise and rely on all resources from the Commission (human, expertise, budgetary, regulatory). Its objective would be to steer actions and responses, and ensure a smooth handover of the implementation to the relevant DGs.

Problem statement

In recent years, the Commission has frequently been required to step in and step up, in order to develop concrete and operational solutions to emerging situations, often multidimensional, and with a very short lead in time. Vaccine acquisition, ammunition production, addressing the overfly of critical infrastructure by drones, and undersea cable incidents are among the critical examples.

The traditional Commission structure has been designed to manage long-time perspectives, and it needs to enhance its capacity to design, develop and implement short term/immediate concrete solutions to critical issues. These scenarios often arise in fields where the competence of the Commission is limited and dependent on Member States.

This requires a different type of mindset and skillset, as well as flexibility and agility in the mobilisation of resources. Often, the reflex is to create a new structure to address the new issue, perhaps a new directorate, or even a new DG, with the accompanying support services. Even task forces, which should logically be time-bound, progressively transform into more permanent structures, integrating all the rigidities they were supposed to avoid. Solutions are found on an ad-hoc basis and often relying on patchy reporting lines and approaches. Finally, the success of the approach often relies on a clear political mandate and a drive in the actual implementation.

Proposed solution

To allow a more reactive and operational Commission, the existing IDEA could evolve into an active and ambitious “red teaming” function, stress testing the current status quo, thinking the unthinkable in a poly-crisis state, identifying new opportunities in the rapidly evolving landscape, and complemented with a new capacity to design, develop and deploy rapid responses to identified issues, under a ‘Fix It’ agenda.

It must be complemented by a capacity to identify and draw on the expertise within the Commission, to create temporary “reactive teams” that would be dismantled once the actions are proposed, adopted and launched. It would have a role to initially steer the answer. However, the implementation of the actions decided would then lie with the DGs most closely linked with the related policy field. Such IDE-FIX function would not be designed to keep the coordinating role over the long run but rather go to the next tasks.

Implementation

The successful implementation of such an approach relies on several pre-requisites:

- A change of mindset in the administrative culture of the Commission when it comes to these tasks – pooling resources, not building new silos.
- The capacity to rely on a strong political mandate, allowing for the necessary flexibility and time-reduction compared to normal procedures (including with respect to budget and human resource allocations for instance).
- The capacity to attract the right skillset to drive such an agenda, mixing political understanding, technical expertise, capacity to mobilise services across the Commission. This means recognising the importance of this in-house capacity and of the services actively cooperating with it.
- The clear understanding that the intervention logic is temporary and short term by design. It is to put forward an ambitious and operational response but not necessarily implement it directly.
- The capacity to be in contact directly with Member States and potentially on the ground, to appreciate the extent of the issues and the potential solution.

Recommendation 6: A people centred approach to transformation

Any structural and organisational change needs to fully integrate the human dimension, with transparent communication channels and a sense of ownership by staff. The process should be inclusive, listening to, supporting and accompanying staff concerned by the changes. New structures need to be lean and agile, grounded on solid and evolving expertise. This requires the ability to recruit and retain the right profiles and competences, and provide the necessary skilling and reskilling support. The recommendations of the LSR workstreams belonging to the “people and culture” cluster should be fully reflected in the process, not the least to foster a strong culture of cross-structural cooperation to jointly and efficiently pursue common missions.

Problem statement

Structural change is required and can constitute an opportunity. It provides space for reflection and improvement, a moment to question existing structures and processes on whether they are still fit for purpose in a changed political, economical and technical environment.

But change is also, understandably, a cause for concern, as it means disruption. Staff can be worried about their professional future, about policies and structures they devoted considerable time and effort to and care about, about the social environment they have been working in, sometimes for many years.

The Commission’s most valuable resource is its staff, and they in turn play a crucial role in serving the European citizens. This service can be best assured by a working environment and culture which attracts the best possible candidates from across the whole Union, and fosters a culture of innovation, initiative-taking and courage to make a positive difference.

Proposed solution

Any structural change needs to integrate the human dimension. Where change is necessary, important principles need to be respected:

- Change needs to be well thought through, modulated, considering all options with their pros and cons. This entails listening to staff, explaining why change is necessary. The Staff Survey 2025 has shown the openness of staff to more efficiently organised DGs, and to more opportunities for internal mobility. Changes in structures create such opportunities, if transparently managed.
- When designing new structures, they need to build on agile, cross-structural cooperation and shorter reporting lines, empowering staff at all

levels. The existing practical guide: [Flexible Structures in the Commission: A Manager's Guide](#)¹, which offers advice and examples, can form the basis for such efforts, together with other LSR workstream recommendations.

- The corporate HR capacity must support the local HR teams of each DG/cluster of DGs through strategic workforce planning, recruitment, talent identification and development, and crucially supporting a culture that rewards agility and flexibility at all levels, allowing staff to develop through mobility and constant learning, and fostering a leadership culture which shares resources to achieve goals.

Implementation

Structural solutions can support cultural change. But without cultural change towards agile cooperation in a “one Commission” mindset, based on other LSR workstreams recommendations, the potential impact of structural change will remain limited.

Executive summary Service model

Problem statement

Like any organisation, the Commission needs to rely on a variety of services, for example, HR, language services, and IT. The way these services work today has evolved organically over the decades. The institutional, societal and technological environment has also changed. As a result, there are now clear opportunities for adjusting the institution's service model to improve the quality of services and use resources more efficiently.

Recommendations

Centralise and provide interinstitutional services

1. Further centralise and expand interinstitutional provision of language services

A more centralised model for language services would reduce overlaps, improve efficiency and ensure the EU administration's capability to embrace the current rapid technological change. Driven by a larger entity built around existing structures (e.g. DGT and SCIC), it should combine structural simplification in translation, interpretation and other language services with an expanded interinstitutional provision of services.

2. Reinforce corporate IT governance and expand interinstitutional provision of IT services and procurement

A strengthened corporate governance of all IT expenditure based on the principle of total cost of ownership would allow better strategic steering, support rationalisation and innovation, and ensure efficient delivery of the digital services on which all Commission policies increasingly depend. It would also enable the Commission to expand and industrialise its existing interinstitutional service offer.

3. Improve efficiency and expand interinstitutional provision of HR and medical services

Streamlining the delivery of HR and medical services through greater simplification, standardisation, selective centralisation and automation would improve their efficiency, consistency and resilience. It would also make it possible to provide more of these services to other EU institutions, bodies and agencies.

4. Pursue synergies in meeting and audio-visual support and building-related services, with potential interinstitutional service provision

A more integrated corporate infrastructure service model for meeting and audio-visual support and for building-related services, with clearer governance and stronger operational convergence, would improve service quality for end-users, increase efficiency and enable more interinstitutional service delivery.

Create new central services

5. Strengthen external audit through centralisation, standardisation and digital integration

Consolidated external audit functions, harmonised methods and terminology, and full audit lifecycle support through a digital platform would reduce duplication of capabilities, allow more agile risk-based planning, increase the quality and impact of audit work, and manage external audit as a professional service.

6. Set up central impact assessment and evaluation support services in the JRC

New central and mandatory impact assessment and evaluation services in the JRC would provide quantitative analytical support to all DGs. This would allow policy DGs to focus on their core policy tasks, while ensuring more consistent, transparent and efficient use of data, models and socio-economic analysis across the Commission and avoiding non-coordinated expenditure for external work.

Restructure services

7. Reinforce central hubs for external communication, learning and development, and access to documents

Reinforced central hubs, built around existing capabilities and responsibilities with a clear service offer, would improve strategic coherence, quality and resource efficiency in the three areas concerned.

8. Upstream legal coordination for cross-cutting policy work

Thematically clustered legal capacity, clarified legal advisory roles across the Commission, and earlier strategic steering from the Secretariat-General would improve the results of policy work by avoiding duplication and reducing coordination needs.

9. Adjust delivery models for services not critical to the institution's mission in childcare, catering and transport

Progressively externalising services not critical to the institution's mission in childcare, catering and transport would make it possible to rationalise the service offers and save resources.

Overarching recommendation

10. Simplify and harmonise inter-departmental and interinstitutional service provision agreements

Radically simplified service agreements between Commission departments and standardised service agreements between the Commission and other EU institutions, bodies and agencies would make service management easier and reduce fragmentation and legal uncertainty.

Recommendations on service model

The existence and delivery of services like HR, audit and IT **are essential**. These services allow staff and departments to focus on the organisation's priorities. In an **ideal situation**, all the **necessary** services would achieve the **required minimum level of quality** and consume **the smallest possible amount** of financial and human resources.

This **ideal situation** is a moving target, because there are always new opportunities for further improvements. However, the following recommendations show how to **move our organisation closer to that ideal**. They concern services whose size means they have an **impact** at the scale of the Commission and set out how **cost reductions** and **quality improvements** would follow from:

- **increasing centralisation** and preparing for **more interinstitutional service provision**;
- setting up **two new central services**;
- **adjusting the way other services work**;
- **externalising services** not critical to the institution's mission.

In addition, there is an overarching recommendation about making it **simpler to formalise service provision agreements** inside the Commission and between EU institutions, bodies and agencies (EUIBAs).

Two **extra factors** are relevant in the context of the EU public administration: There are a **limited number of 'establishment plan posts'** (i.e. authorised jobs adopted through the budget procedure). This means that a change that replaces establishment plan posts with other resources could be beneficial, even if a purely financial analysis would suggest otherwise.

Some services may be politically sensitive, both in the Commission and in other EUIBAs. This is why there is some **duplication** of services across EUIBAs, and therefore a **large potential for collaboration** and the realisation of economies of scale.

The following recommendations therefore **underline the opportunity for the Commission to provide more such services to other EUIBAs** which would help successively reduce their administrative expenditure overall. Considering that some companies are far greater in size than the entire EU public administration, there is little justification for not trying to tap into this potential to free up resources. Nevertheless, it is important to underline that these proposals are **without prejudice** to any later discussion between the Commission and the other EU institutions, bodies and agencies.

Transparent dialogue with affected staff, proper transitional arrangements and overall **careful change management** will be key for successfully implementing any of the recommendations.

Centralise and provide interinstitutional services

Recommendation 1: Further centralise and expand interinstitutional provision of language services

A more centralised model for language services would reduce overlaps, improve efficiency and ensure the EU administration's capability to embrace the current rapid technological change. Driven by a larger entity built around existing structures (e.g. DGT and SCIC), it should combine structural simplification in translation, interpretation and other language services with an expanded interinstitutional provision of services.

Problem statement

The observable rapid quality improvement of artificial intelligence (AI) language tools seriously **challenges the status quo** for the provision of language services. The level of quality and reliability of AI solutions is by far more advanced for translation but is still insufficient for interpretation (especially for less widely spoken EU languages) in sensitive negotiations and meetings.

At present, **different entities** manage translation, interpretation and editing services in the EUIBAs. Within the Commission, DGT, SCIC, the Legal Service and the Publications Office all deliver these types of services. **Interinstitutional cooperation** already takes place in SCIC, which provides interpretation services to the Commission, the Council, the Committees and other EU agencies. SCIC also serves as the testing office and paymaster for the accredited freelance interpreters working for the Commission, the Parliament and the Court of Justice. Yet the different language services are organised separately according to different procedural needs and priorities. This limits economies of scale, weakens coordinated investment in technology and terminology, and **reduces the EUIBAs' collective ability to organise multilingual capacity efficiently**.

While some of the EU institutions employ large numbers of language professionals, the decentralised EU agencies ask for fewer legally precise texts and are increasingly using AI for simpler translations. As a result, the existing CdT agency in Luxembourg already **faces declining volumes** and its fee-based model has become unsustainable.

In summary, **the current setup does not allow economies of scale** to help cover all the needs of all EUIBAs. And faced with the current onslaught of technological advances, even if at varying speeds and current levels of maturity between translation, interpretation and editing services, each individual entity is too small to efficiently transition to a new sustainable setup.

Proposed solution

The Commission should create a single integrated language services model in two steps.

First, DGT should integrate the CdT's staff and functions. DGT would then become the **enlarged provider of translation services to decentralised agencies** on a fee basis, replacing the current CdT model with a more sustainable and efficient interinstitutional service arrangement.

Second, this enlarged entity should serve as the **foundation for a broader interinstitutional language services model**. The Commission should progressively deepen synergies between written and spoken language services across DGT, SCIC, the Legal Service and the Publications Office, while also scaling up structured service provision and cooperation with other institutions where this brings clear added value. The emphasis should be on building a stronger capacity for multilingual services across the EUIBAs, rather than keeping separate approaches without a strong justification.

Priority areas should include AI development, terminology, preparation for enlargement, skill-building and multimodal language solutions based on European technologies. The emerging division of roles in AI-related language work provides a practical basis, with DGT focusing on text-to-text and SCIC on speech-to-speech and speech-to-text. The Commission should also develop joint work on training capacity, including cooperation with universities and with talent pipelines in Member States and candidate countries.

In this model, the new linguistic service would become the natural anchor for a more scalable interinstitutional language service offer. A stronger common provider would help all EUIBAs by ensuring **economies of scale** and efficient use of establishment plan posts as well as a more coordinated investment in tools, skills and multilingual capacity.

Implementation

Implementation should be step by step. For CdT, the ongoing evaluation due in Q2 2026 should inform the final decision, alongside an assessment of legal constraints, since the founding regulations of 28 agencies refer to CdT's translation services. Its dissolution will also require discussions with Luxembourg.

For the broader interinstitutional model, the Commission should build first on existing cooperation and service provision and **then scale up more structured arrangements** around the enlarged DGT and closer collaboration with SCIC and other relevant services. Particular attention is necessary for governance, confidentiality of documents before adoption, institutional priorities and

operational design. The goal should be a coherent and efficient interinstitutional language services model in which a strong and ultimately much more centralised providing entity supports multilingual delivery across all EUIBAs, while reinforcing European technological sovereignty.

A staggered approach to implementing this recommendation should not stand in the way of faster operational cooperation. For example, instead of hiring newcomers when replacing retiring language professionals, the focus should be on developing a mix of linguistic and technological skills in the remaining language services staff and in their counterparts in the EUIBAs. This would help all EUIBAs adjust faster to the ongoing technological trends while safeguarding high-quality language services.

Recommendation 2: Reinforce corporate IT governance and expand interinstitutional provision of IT services and procurement

A strengthened corporate governance of all IT expenditure based on the principle of total cost of ownership would allow better strategic steering, support rationalisation and innovation, and ensure efficient delivery of the digital services on which all Commission policies increasingly depend. It would also enable the Commission to expand and industrialise its existing interinstitutional service offer.

Problem statement

There are two problems, one in the Commission and one concerning IT for all EUIBAs.

The Commission uses a hybrid model for providing IT services: DIGIT provides business-agnostic IT services (i.e. services with users throughout the Commission), but area-specific IT systems are the responsibility of the lead departments. This model aims to balance the benefits of centralisation with responsiveness to business needs. It is still **broadly valid**, even though the advent of AI-assisted software development, IT operations and IT security is tilting the **balance towards more centralisation**. This is because large, experienced, centralised teams benefit even more than smaller teams in DGs from the productivity improvements AI is bringing. **At the same time, the financing of IT within the constraints of the EU budget has become a more pressing challenge:** Annual IT spending has exceeded EUR 1.2 billion since 2024. Of that, around 40% is spent on centralised IT services and 60% on area-specific systems. Meanwhile, the Commission faces growing IT spending needs linked to sovereignty, AI and cybersecurity.

The challenge for the Commission therefore is to ensure that all its IT investment decisions help optimise the Commission's overall IT setup. This

means finding the best mix of central and local responsibility and investments that are sustainable and that take all corporate needs into account.

The current reality is that the Commission's IT and Cybersecurity Board (ITCB) only oversees the administrative budget spent on IT, not the entire budget spent on IT. Without a strong corporate steer across all funding sources, it is impossible to correctly prioritise investments, drive standardisation and re-use of existing building blocks and ensure that systems that are critical across the institution are owned and provided by the best-placed departments. And this is the reality despite the improvement made in the current Multiannual Financial Framework to use financial incentives (a system of baseline and charged back services) to influence DGs' decisions towards the best institution-wide outcome.

The problem with IT across all EUIBAs is more straightforward: despite the existing interinstitutional service provision by the Commission, most IT in most EUIBAs is local. This means duplication of skills and capabilities, EUIBAs competing for scarce technical staff and very pronounced cybersecurity risks for smaller entities. Overall, there is significant savings potential which stronger collaboration and centralisation of service provision could unlock.

Proposed solution

The Commission should put in place **an even stronger corporate IT governance structure** with a clear mandate to steer IT investments, architectures, service models and funding decisions **across all departments and all funding sources**. This would create one corporate capability for digital support for all policies and administrative functions and ensure that all investment decisions factor in their institution-wide impact.

That stronger governance structure and the associated clarity about IT costs and value would also make it easier to tackle the problem of IT duplication across the EUIBAs, because it would allow the Commission **to expand its interinstitutional service provision** in a sustainable way.

Implementation

The implementation of this recommendation should build on the current hybrid model rather than replace it. The **first step should be to strengthen the ITCB** to steer IT coherently across technologies, business domains, funding mechanisms and interinstitutional service offerings. The reinforced ITCB would need a new layer of technical capability to ensure coherence across all the various portfolios of systems managed by the DGs. A new **IT Architecture and Technology Council**, modelled on the existing Cloud Council, should fill this role and draw on the staff of DIGIT and the DGs.

The financial processes underpinning the stronger ITCB should be based on **systematic total cost of ownership management**. System owners and the corporate IT governance actors must have a clear view of the end-to-end costs generated by all systems and services, including infrastructure, platforms, operations, security, maintenance and evolution. **Corporate IT services whose running cost system owners cannot meaningfully influence (baseline services) should remain freely available for DGs, but all other services should apply a pay-as-you-go model.** Since changes to the financing and charge-back logic across a large organisation as the Commission can have significant effects on services and programmes, real-life simulations will support adjusting the model. This will help assess distributional impacts, evaluate behavioural incentives and prepare the transition.

The reinforced ITCB should also **review business domain ownership in cross-cutting domains**, i.e. those where no single DG has dominant operational experience or where the rationale for the current setup has weakened over time.

An important example is procurement. On the one hand, **cluster-based centralisation of procurement activities** (with a **lead service** in each content area using procedures and tools to buy the services and deliverables needed in **all related departments**) is already well advanced in the IT domain. DIGIT conducts most IT-related procurement, including for a large number of EUIBAs, and is supported in this by the corporate IT Procurement Board created in 2025.

On the other hand, **the corporate governance of the eProcurement suite of tools** (whose business domain owner, for historical reasons, is the JRC) **has grown to be too complex and not agile enough to meet DGs' needs.**

The reinforced ITCB should decide to **combine** both the business domain leadership for procurement processes and the responsibility for the corporate eProcurement solutions **in DIGIT**. The goal should be to improve the coherence between business rules, process design and supporting IT tools.

The Commission should also provide **standard bundles of IT services** to other EUIBAs. This is particularly relevant for common administrative needs (such as the digital workplace, HR tools, document management, contract and budget management), where the Commission is already acting as a service provider for dozens of EUIBAs. Building on this starting point, the Commission should deliver such standard bundles of IT services to all new entities, such as Joint Undertakings and decentralised agencies.

Recommendation 3: Improve efficiency and expand interinstitutional provision of HR and medical services

Streamlining the delivery of HR and medical services through greater simplification, standardisation, selective centralisation and automation would improve their efficiency, consistency and resilience. It would also make it possible to provide more of these services to other EU institutions, bodies and agencies.

Problem statement

Within the Commission, HR, PMO and local HR Correspondent (HRC) teams in DGs are all involved in **HR service delivery**. Earlier reforms have brought gains in professionalisation and consistency. However, overlaps persist, the division of tasks is not always clear and local practices vary. Rules and processes are still too complex and insufficiently automated. This reduces efficiency and can create unequal treatment or uncertainty for staff. The Commission already provides HR services to over 70 EUIBAs.

In **medical services**, the Commission has already rationalised delivery and outsourced certain services where market offers are adequate. It also already provides medical services to over 50 EUIBAs through service level agreements. However, current financial contributions from EUIBAs may not fully cover the cost of the services provided by the Commission, and there are still duplications and divergence across institutions in service models, practices and systems. More broadly, there is scope to deepen harmonisation and to explore a more integrated interinstitutional service model.

In both areas, current **Commission data protection rules and practices** (which often go beyond the legal framework) hinder greater automation of certain processes by making it difficult to develop and run related IT systems. They also make cooperation between different services working on similar areas more difficult. In the areas of HR and medical services, these rules are preventing the Commission from taking advantage of the AI revolution, where predictions are that in the next 3-5 years, 50% of HR services outside the EU institutions could be automated.

Proposed solution

The Commission should pursue efficiency for HR and medical services and consider opportunities for increased interinstitutional service delivery.

For HR services, this should include clearer allocation of tasks between HR, PMO and local HRC teams, with more centralisation of non-strategic or low-frequency tasks in HR, and transfer of standardised process-handling tasks to

PMO where more automation is possible. The Commission should review the HRCs' mandate and scope to increase their strategic contribution. And it should make rules and workflows simpler, especially in areas that generate high volumes of staff queries or derogation requests. More processes should move away from email-based handling towards digital workflows.

For **medical services**, the Commission should continue deepening standardisation through the interinstitutional medical board and, in parallel, explore a more integrated interinstitutional delivery model. This could take the form of a common Medical Service for a group of EUIBAs or a further expansion of the Commission Medical Service to serve more EUIBAs, with a central core service and local add-ons where justified. This should build on ongoing work on common standards, shared tools and the rollout of the SERMED² (Electronic Health Solution for Medical Services) tool.

In both areas, the Commission **should make greater use of its existing service capacity to provide services to EUIBAs**. For HR, this means expanding the range of services offered and simplifying access to them, including through a more harmonised and generic approach to service level agreements. For medical services, this means clarifying costing, strengthening standardisation and building towards a more scalable interinstitutional model. The overall goal should be for the Commission to act more fully as a professional service provider for all EUIBAs where this delivers efficiencies and better outcomes.

The expected result is a more efficient internal service model for the Commission and a stronger interinstitutional service offer that reduces duplication, increases consistency and achieves economies of scale across the EU administration (all EUIBAs).

Implementation

Implementation should take place in phases. Internally, the Commission should first review and clarify the split of responsibilities in HR service delivery, decide tasks for recentralisation in HR or transfer to PMO, and prioritise simplification and automation opportunities.

At **interinstitutional level**, the Commission should build on existing service provision arrangements and the work of the interinstitutional medical board. For HR services, the Commission should see which other services could add value if offered to EUIBAs. For medical services, a feasibility study should assess governance, funding and service design options for a common or expanded interinstitutional medical service. In both cases, increased delivery of services to other EUIBA is conditional on simplifying the current approach to SLAs.

Recommendation 4: Pursue synergies in meeting and audio-visual support and building-related services, with potential interinstitutional service provision

A more integrated corporate infrastructure service model for meeting and audio-visual support and for building-related services, with clearer governance and stronger operational convergence, would improve service quality for end-users, increase efficiency and enable more interinstitutional service delivery.

Problem statement

The current arrangements for **meeting and audio-visual support services** and for **building-related services** in the Commission and beyond show fragmentation, uneven service levels and insufficient exploitation of synergies. While these are distinct domains, both suffer from a similar structural issue: services connected from a user and infrastructure perspective come through separate channels, with different governance set-ups and limited integration.

In **meeting and audio-visual support services**, users face a fragmented support landscape for meeting rooms, digital tools and audio-visual infrastructure. Different services oversee parts of the same user journey, notably SCIC, DIGIT and OIB and OIL, as well as, for certain security-related aspects, HR.DS. This makes support harder to navigate, creates duplication in governance and troubleshooting, and results in an inconsistent service experience across locations. It is particularly problematic as meeting environments become more integrated technologically.

In **building-related services**, OIB operates in a complex environment with a broad and evolving portfolio, including Commission and agency buildings in Brussels and representation buildings in Member States. Meanwhile, the JRC manages its own buildings. However, OIB's legal basis is outdated and does not fully reflect the scope its responsibilities that have grown over time, notably for the representations' buildings. At the same time, the real estate context is becoming more demanding, with budget pressure, high energy-efficiency expectations and the need for new skills related to smart buildings. The separate existence of OIL in Luxembourg also points to underused opportunities for closer alignment and economies of scale.

Overall, the current service models limit efficiency, make responsibilities less transparent, and prevent the Commission from organising these infrastructure-related functions more coherently.

Proposed solution

The Commission should move towards a more integrated corporate service model for **meeting and audio-visual support services** and **buildings**.

For **meeting and audio-visual support services**, the Commission should set up a **single point of contact** and a more integrated operating model bringing together the user-facing support dimensions for meeting rooms, IT and audio-visual infrastructure. The aim should be to provide a consistent service standard across venues, supported by aligned service levels, KPIs and workflows, while still allowing for local back-office adaptations where necessary and keeping the current integration with interpretation, conference organisation and other meeting services (e.g. ISO-compliant infrastructure, request handling and arbitration, and conference managers).

For **building-related services**, the Commission should **clarify and modernise OIB's role** and further explore **synergies between OIB and OIL**, including by updating their legal bases to reflect their actual scopes of activity. A more strategic view of infrastructure management is also necessary. This concerns the current real estate framework which is too restrictive. And it concerns the required competencies for managing modern and increasingly intelligent buildings. For example, a different approach to facilities management could include more extensive sourcing of the needed skills from the market.

Across both domains, the Commission should assess opportunities for **interinstitutional service provision** where economies of scale, technical specialisation or common infrastructure needs justify a shared approach. For example, EUIBAs competing for the same buildings in Brussels is a lose-lose scenario for the EU administration overall. And a similar argument applies to them competing for the same scarce staff with skills in real estate procurement and management.

Implementation

The main implementation challenge would be to strengthen integration and central steering without creating unnecessary rigidity. The model should therefore combine clear central coordination with targeted operational flexibility. The goal is not to merge all functions into a single structure, but to create a clearer, more centralised and more scalable corporate service model for infrastructure-related services that are currently too dispersed. The implementation should therefore be progressive and pragmatic, focusing on service integration where the benefits are clearest.

For meeting and audio-visual support services, the goal should be to build a common support model across the services involved, notably SCIC, DIGIT and OIB/OIL. This work should start by aligning service-level agreements and KPIs, clarifying tooling ownership and mapping end-to-end user workflows. Setting up a single operational front door for users should follow once the maturity of all service providing entities allows. A new common operational team or closely coordinated service arrangement should then deliver a uniform service across venues, while allowing local adaptation in the back office. This should support the ongoing technological transition of the meeting room infrastructure as well as the broader integration of technical support for meeting services. SCIC, OIB, HR.DS, SG, COMM and DIGIT are currently developing this more integrated and user-centric approach in view of the operational preparedness of the new conference centre in Brussels, which will be a game changer for Commission meetings and events.

For building-related services, implementation should begin with an update of OIB's and OIL's legal bases, reflecting their actual scope and clarifying the tasks attributed to them. In parallel, the Commission should choose specific areas for deeper cooperation between OIB and OIL, building on existing examples such as the common housing manual. The future service model should also allow for greater flexibility, for example when it comes to the prospection perimeter.

The Commission should assess the **interinstitutional perspective** for both domains, especially where the services are sufficiently standardised and demand from EUIBAs exists.

Create new central services

Recommendation 5: Strengthen external audit through centralisation, standardisation and digital integration

Consolidated external audit functions, harmonised methods and terminology, and full audit lifecycle support through a digital platform would reduce duplication of capabilities, allow more agile risk-based planning, increase the quality and impact of audit work, and manage external audit as a professional service.

Problem statement

External audits aim to provide assurance on the correct spending of EU funds to the responsible authorising officers at the Commission (i.e., this recommendation does not concern the work of external audit bodies such as the

European Court of auditors). Multiple actors work on external audits across the Commission today, often using different approaches, terminology and tools.

This **fragmentation** creates duplication, inefficiencies and confusion, including for similar programmes or risk areas. How an audit done too often depends on who does it, leading to **varying approaches** even where the underlying rules are the same.

Audit processes can also become **excessively long**, in part because of externalisation, multiple layers of review and cumbersome exchanges with operational services. When audit findings arrive two or three years after implementation, their practical impact is smaller.

Moreover, **professionalisation is uneven**. Sometimes there is a lack of formal training, and the quality of outsourced audit reports is not always sufficient, requiring more oversight which partly offsets cost advantages of outsourcing.

Existing planning approaches are also too static, with long multiannual plans that do not allow redirecting resources quickly when new risks appear.

Lastly, **digital support is a major weakness**. Current IT tools are slow, fragmented and poorly aligned with operational needs. They often focus only on follow-up rather than supporting planning, evidence collection and reporting. As a result, auditors spend too much time managing documents manually and too little time on analysis and assurance.

Proposed solution

External audit services should be set up in a way that makes them available **for their intended purpose**, namely, to help the responsible departments to check and to prove the correctness and quality of their programme and policy implementation. They should follow the highest standards of professional quality and build on a professional relationship with the requesting department.

To **enable external audit to function as a service**, the Commission should adopt a more centralised model. This could take the form of either:

- a single central audit structure for the whole Commission (and would be organised internally around the different audited policy and programme areas, like the Internal Audit Service today); or
- central audit services for each major policy area (e.g. the three big pillars of the next MFF).

In either case, the goal should be to pool staff, reduce duplication, standardise the outsourcing of audit work to external operators and function under a common governance framework, **while avoiding detachment from policy realities**.

At the same time, **audit work should be standardised across the Commission** through common terminology, harmonised methodologies, shared templates, common quality benchmarks and stronger professional training requirements for staff, including formal certification. Audit planning (i.e. the numbers, types and scopes of audits needed by each client) should become more dynamic and risk-based so that expert staff can move within the central audit structure as risks evolve.

A unified, **fit-for-purpose digital platform** should support the full audit lifecycle, from planning and sampling to evidence management, reporting and follow-up. This platform should enable automated workflows, shared document management, real-time analytics and features tailored to audit needs.

Implementation

The first step should be a **Commission-wide inventory** of audit directorates, units and teams, covering staffing, skills, workloads, overlaps and existing collaboration mechanisms. On that basis, the Commission decide on the preferred centralisation model, considering the next Multiannual Financial Framework and the need to ensure close links with policy DGs. The aim here would be to secure a governance model that will keep strong, semi-structural links with the policy DGs (audited services) to preserve an essential connection.

In parallel, **work should begin on core building blocks**: a common audit glossary, standard templates and methods, mandatory training, a quality assurance framework, dynamic risk-based planning and the design of a unified IT system.

Implementation will require high-level endorsement and active engagement from auditors, policy services and IT stakeholders. It is important to avoid recreating an overly rigid control structure and instead build an audit function that is professional, responsive and connected to effective policy delivery.

Setting up and using external audit as a professional service inside the Commission will also require **adjusting the way external auditors are contributing to the DGs' Annual Activity Reports** and the statements of assurance today.

Lastly, **resource allocation** will also be an important topic for the implementation phase. While current internal resources employed in external audit work could be used to kick off the new way of working, over time the element of efficiency should become more pronounced, so that the audit service's clients have an incentive to request exactly the number of audits they need.

Recommendation 6: Set up central impact assessment and evaluation support services in the JRC

New central and mandatory impact assessment and evaluation services in the JRC would provide quantitative analytical support to all DGs. This would allow policy DGs to focus on their core policy tasks while ensuring more consistent, transparent and efficient use of data, models and socio-economic analysis across the Commission and avoiding non-coordinated expenditure for external work.

Problem statement

Impact assessment and evaluation support is **currently fragmented**. The JRC, policy DGs, dedicated advisory structures and external contractors all contribute analytical capacity. This can result in duplicate work, inconsistent assumptions and differing modelling approaches, particularly on cross-cutting files. It also makes it harder to find existing internal skills and to use and reuse data and modelling capabilities in a coordinated way.

At the same time, not all DGs have sufficient in-house quantitative capacity to support increasingly demanding impact assessments and evaluations. This creates bottlenecks and can lead to **overreliance on outsourcing**, even where relevant skills already exist within the Commission. The absence of more structured support functions therefore weakens efficiency and can affect the quality of analytical results and can also lead to unnecessary expenditure for external experts.

Lastly, the JRC as the in-house scientific service of the Commission is employing a **substantial number of highly qualified staff** even though its involvement in policymaking or policy implementation today depends on the individual choices of policy DGs to work with the JRC. Indeed, several DGs already work closely with the JRC while others do not. The problem is the absence of a harmonised, structured service offer.

Proposed solution

The Commission should set up **one-stop-shop impact assessment and evaluation support services** anchored in the JRC. The services should provide quantitative support to all DGs conducting impact assessments or evaluations, while leaving overall responsibility for the preparation and steering of these essential elements of the better regulation framework with the policy DGs concerned.

The new services should build on the **JRC's existing experience in quantitative modelling and scientific advice** and should progressively rely on a broader

internal analytical infrastructure, including linked databases and models and AI-supported analytical laboratories.

Their purpose will be to

- make high-quality socio-economic analysis more accessible across the Commission;
- improve consistency of methods and assumptions;
- allow all DGs working on related questions to start from the same input.

These new central support functions should also help **reduce duplication**, improve the transparency of analytical work and ensure that scarce experts work where they add most value.

This recommendation does not mean the JRC's mandate would expand at the expense of policy DGs. It responds to a long-standing expectation that the Commission's in-house scientific service **should systematically support policymaking with research-grade analytical work**. Policy DGs would keep ownership and responsibility of the impact assessments and evaluations and their conclusions.

Implementation

The JRC should design and create the new services and draw on its existing capabilities, staff and experience in supporting impact assessments. Unlike the current setup in which the JRC supports individual DGs on demand, **using the new services should become mandatory for all impact assessments and evaluations** as soon as possible. The JRC should also centrally obtain external support so that it can tap into economies of scale when outsourcing.

Implementation should be closely linked to wider efforts **to improve the Commission's analytical infrastructure**, in particular work to connect databases (to avoid situations in which different departments repeatedly procure the same data from the same providers) and modelling tools, **and to make socio-economic analysis more shareable and reusable**, including throughout the legislative process with the other institutions.

Financial resources: the new services should have a transparent cost model so that the policy DGs using the service contribute to its operating costs (to pay for data sources, analytical software, external experts etc.). This would not create a new financial burden because DGs already incur expenditure for analytical work when relying on external contractors.

Human resources: the service should draw on existing staff in the JRC, while staff who would otherwise have worked on impact assessments and evaluations in the policy DG can be refocused on other priorities.

Restructure services

Recommendation 7: Reinforce central hubs for external communication, learning and development, and access to documents

Reinforced central hubs, built around existing capabilities and responsibilities with a clear service offer, would improve strategic coherence, quality and resource efficiency in the three areas concerned.

Problem statement

Across the Commission, external communication, learning and development, and access to documents all suffer from **fragmentation, uneven practices and insufficiently integrated corporate support**. Although these three areas differ in nature, they share a common structural problem: for functions with strong corporate value there are multiple actors, tools and local practices, with limited common steering and insufficient economies of scale.

In **external communication**, the current setup shows dispersed leadership, overlapping roles between COMM, communication units in DGs, cabinets, the SPP and Representations, and a model focused on traditional media which no longer fully reflects how audiences consume information. This leads to inefficiencies, inconsistent messaging, duplication of effort and underuse of modern tools, including AI-supported content production and smarter digital outreach.

The Commission has a rich and extensive offer in **learning and development**, but governance arrangements span HR, SG, BUDG, DIGIT, policy DGs, the JRC and other actors. As a result, there is no sufficiently strong corporate mechanism to align skills development with strategic workforce needs, reduce overlaps, rationalise the offer, track impact or connect development pathways to future organisational priorities, including AI-related reskilling.

Current arrangements for **access to documents** are under strain from obsolete concepts, inconsistent filing practices, the growing volume of requests, high transaction costs linked to manual redaction, and uncertainty about what existing collaborative platforms mean for document management purposes. This creates legal, operational and capacity challenges and undermines consistency in responses and record-keeping.

Taken together, these weaknesses reduce quality, slow delivery, absorb resources and **make it harder for the Commission to act centrally** in areas where stronger central support would create clear added value.

Proposed solution

The Commission should **reinforce three dedicated central hubs** for external communication, learning and development, and access to documents. Each hub must fit its policy and operational context but follow the same logic: stronger corporate leadership and governance, precise roles and responsibilities of all actors, clearer service offers, better use of technology, more consistent standards and a more efficient allocation of resources.

For **external communications**: a clear allocation of responsibility for each type of communication campaign is key for success, differentiated by subject matter, target audiences and national or regional specificities.

The relevant actors are:

- the Spokesperson's Service and COMM (for coordinating campaigns that cut across policy areas or address the public across the EU);
- the DGs (for policy-specific campaigns with specialised audiences);
- the Representations (for national or regional campaigns).

The central corporate communication hub in COMM should support and enforce this allocation of responsibilities and the coordination between the involved actors. It should also provide services such as social media production, audiovisual content, paid amplification, platform knowledge and AI-supported adaptation of content to all involved entities.

For **learning and development**: the Commission should put in place a stronger central hub function within a broader skills and capability governance model. This should connect the involved actors, define shared priorities for current and future skills, support rationalisation of the learning offer, improve the alignment between organisational needs and individual development pathways for staff. It should also use reporting to promote and track uptake, capability gains, mandatory training and strategic workforce readiness.

This hub should go beyond formal training administration and **support capability-building more broadly**, including on-the-job learning and reskilling. This approach will be most powerful for skills and training needs that exist across the entire organisation. But once built, the same approaches will help area-specific training as well and underpin the delivery of **learning and development as a strategic service supporting the needs of the institution**.

For **access to documents**: the Commission should reinforce the existing central hub for methods, guidance, tools and operational support. It should strengthen the guidance on access to documents and document management, promote more consistent filing and archiving practices across DGs and invest in automation solutions for auto-filing and assisted redaction. It should also help address the growing burden caused by high request volumes and uneven quality of first-level replies.

Each of these hubs should combine strategic steering and corporate governance with practical enablement and impact tracking. The aim is a better balance between corporate coherence and local delivery as well as improved service quality, reduced duplication and savings across three critical cross-cutting functions. Tracking the impact of their activity over time would feed into an ongoing improvement loop for all three hubs.

Implementation

Implementation should follow a coordinated but differentiated approach.

For **external Communication**: the Commission should (i) clarify governance and roles, (ii) empower COMM to enforce a more targeted and situational allocation of responsibilities for every type of communication campaign, and (iii) build a service hub for DGs and Representations to use via support requests and the consumption of standardised services. There should also be a review of communication channels, a more strategic social media set-up, smarter use of AI under human oversight, and improved impact evaluation.

For **learning and development**: the Commission should (i) set up a corporate governance mechanism that brings together the principal actors, (ii) define decision rights and responsibilities, (iii) map the skills needed in the future, and (iv) launch a shared dashboard connected to the underlying HR and learning systems. The hub should guide rationalisation of the offer, strengthen managers' role in staff development and support a more visible learning culture across the organisation.

For **access to documents**: the Commission should (i) update its internal methods and guidance, (ii) define clearer rules on finalised documents versus work in progress in collaborative platforms, and (iii) deploy automation tools for filing and redaction.

A common implementation principle across the three hubs should be proportionality: centralise what benefits from scale, standardisation and specialist knowledge, while leaving room for DGs and services to adapt delivery to operational realities.

Lastly, when it comes to funding, all three activities should have **standard mandatory responsibilities** of the central entities providing the services and covered by their budget allocations and **service offerings** for which the consuming DGs will pay based on clear cost models. For example, corporate guidance and the provision of automated tooling around access to documents should come from the central service's budget while the requesting DGs should pay for content for social media because this promotes efficient allocation of scarce resources.

Recommendation 8: Set up upstream legal coordination for cross-cutting policy work

Thematically clustered legal capacity, clarified legal advisory roles across the Commission, and earlier strategic steering from the Secretariat-General would improve the results of policy work by avoiding duplication and reducing coordination needs.

Problem statement

Having authoritative legal advice available upstream is **extremely useful** for colleagues working on legislative proposals. Upstream legal advice provides clarity and avoids the need for extensive coordination and alignment later. However, legal advice on **cross-cutting policy files** is currently too fragmented across the Commission.

Overarching legal questions that affect more than one department (as is often the case with political priorities not aligned with the Commission departments' structure) often **involve different legal actors**, without working arrangements in place to ensure upstream coordination. This can lead to duplication of efforts, inconsistent approaches, and the identification of legal issues too late in the policy process.

In particular, the division of competences for legal advice between the Legal Service, legal and policy units in the DGs, and the Secretariat-General is not always sufficiently clear in practice. As a result, policy drafters may receive uncoordinated guidance and face escalations only at a late stage when there is little room for adjustment. This creates **inefficiencies, delays, and occasional late 'blocking' interventions**.

The wider consequence is that the use of scarce legal capacity is not as effective as it could be, and the Commission is less able to put forward coherent legal positions across related policy initiatives.

Proposed solution

The Commission needs a more structured model for legal advice and policy coordination.

- **Legal capacity should be clustered around policy ‘families’ of DGs or groups of related files.** This would make it possible to organise capacity around recurring thematic issues, promote specialisation, and reduce unnecessary duplication across departments facing similar legal questions.
- **The Secretariat-General should give stronger upstream guidance on strategic legal decisions for cross-cutting files.** Earlier coordination would help recognise sensitive legal questions before drafting is advanced, support alignment across departments, better sequence multi-part policy packages, and reduce the risk of late-stage conflicts.
- **The respective roles of the Legal Service, legal and policy units in the DGs, and the Secretariat-General need clarification.** That will make it easier to know who leads on which issues, when to escalate, and how legal input should feed into policy preparation.

Together, these three measures would improve the quality, consistency and timeliness of legal advice, especially on complex files involving multiple services. They would also strengthen knowledge-sharing, make better use of existing skills, **and promote collaboration across the Commission.**

Implementation

As a first step, the Commission should map the main categories of cross-cutting legal issues and select a limited number of ‘families’ of policy DGs or groups of related files where a clustered approach would bring immediate value. **Pilot arrangements** could then apply to selected files with legal overlap.

In parallel, the Secretariat-General, together with the Legal Service and the concerned policy DGs, **should discuss and define practical coordination triggers** for early legal discussions on cross-cutting files. Those discussions should take place when such initiatives start or when the Commission decides on a political priority. They should address clearer moments for escalation, the sequence in which the Commission puts forward different proposals, common expectations on legal input during drafting, and standard arrangements for interservice coordination.

Afterwards, internal guidance should set out each **actor’s responsibility**. This should allow for enough flexibility for adapting to the specific needs of individual files while providing sufficient clarity to reduce overlap and uncertainty.

Recommendation 9: Adjust delivery models for services not critical to the institution's mission in childcare, catering and transport

Progressively externalising services not critical to the institution's mission in childcare, catering and transport would make it possible to rationalise the service offers and save resources.

Problem statement

Catering, childcare and transport services, while important to staff welfare, are not part of the institution's core 'policy delivery and implementation' mission. Moreover, they currently apply hybrid or fully internal models that no longer fully reflect operational needs or market conditions.

In **catering**, internal management is significant even where concession-based models are available, which restricts the Commission's ability to respond to evolving needs.

In **childcare**, tasks continue to be organised mostly in-house although comparable alternatives exist on the market. Moreover, current arrangements are administratively complex and not fully aligned with changing demand (for example, the increase of teleworking has driven parents' interest in a broader geographical spread of childcare offerings).

In **transport**, the current use of designated drivers for specific use cases leads to inefficient use of both staff and fleet. Limited coordination between OIB and OIL leads to avoidable greenhouse gas emissions.

Across these areas, **governance is also overly complex**. Joint committees are strongly involved in operational matters, limiting the ability of OIB and OIL to manage services effectively, e.g. childcare, where committees are interinstitutional. There is also scope for **more synergies** between Brussels and Luxembourg, including integration of back-office functions, more centralised delivery models and pooling resources.

Proposed solution

Three principles should govern the approach to non-critical support functions:

- externalise where market solutions are practical;
- keep internal control where operationally justified;
- tailor service delivery to local conditions.

For **catering**, this means:

- for Brussels, maximising the hybrid model through greater use of concession contracts to allow for greater flexibility but with the possibility of keeping strategic and highly frequented sites under internal control;
- for Luxembourg, the service should focus on a more limited number of sites, such as the future Jean Monnet 2 building, combined with further externalisation of delivery;
- for Ispra, more internal delivery may remain justified if this is more efficient in the local market context.

For **childcare**, more services in Brussels should be externalised, and practical market alternatives should help reduce non-core Commission offers such as holiday camps when these are available on the local market. At the same time, the Commission should improve the funding and cost-allocation model, including parental contributions, and simplify the budgetary and contractual architecture of this interinstitutional service.

For **transport**, there should be more limited use of designated drivers as well as a pool for replacements and for other transport needs. The pool model could also be externalised in part, while keeping current security standards. In parallel, OIB and OIL should pursue (i) **stronger synergies** between their transport services and (ii) an expansion of interinstitutional collaboration or service provision, which would also help in the pursuit of greening goals.

OIB and OIL should systematically pursue synergies across these three service areas, including for administrative support, procurement, stock management, IT tools, cash systems and staffing back-up arrangements.

Implementation

Implementation should be **in phases** and based on **quantitative analysis**. For catering and childcare, this should build on ongoing procurement exercises, external evaluations and audit follow-up actions. For transport, the current allocation model for drivers and fleet should change after a benchmark against more rational models already used by other EUIBAs.

A key horizontal enabler would be a **governance reform**. The legal framework, and particularly a Commission decision of 2005 on improving social dialogue in the Commission through Joint Committees (often referred to as “Action 56”), should be reviewed. Adjustments of the number of joint committees and their roles in operational matters would enable OIB and OIL to manage the services more effectively.

Implementation would also require **careful change management** and extensive outreach to staff representatives, trade unions and users. Local constraints, including the seat agreement with Luxembourg, which requires a minimum number of Commission staff to be based there, and the attractiveness of the site as well as the need to ensure service continuity and customer satisfaction during the transition phase are also key factors.

Overarching recommendation 10: Simplify and harmonise inter-departmental and interinstitutional service provision agreements

Radically simplified service agreements between Commission departments and standardised service agreements between the Commission and other EU institutions, bodies and agencies would make service management easier and reduce fragmentation and legal uncertainty.

Problem statement

Overall, the present framework **for formalising and documenting interdepartmental and interinstitutional service provision** is too dispersed, too reliant on local practice, too ad hoc, and not standardised enough to allow for higher levels of automation. This reduces efficiency and transparency.

One problem is the **wide range of instruments** used for cooperation and service arrangements, including Memoranda of Understanding (MoUs), Service Level Agreements (SLAs), conventions, administrative agreements and other similar legal and quasi-legal acts. It is common to find different denominations for arrangements that are functionally the same or similar. This creates avoidable fragmentation and makes it harder to understand which instrument to use in which situation.

Another problem is that **departments do not apply BUDG corporate guidance consistently**. This leads to different drafting practices, uneven levels of legal and financial precision, and uncertainty as to the minimum content and procedural requirements for such arrangements. The result is inefficiency for operational services, duplication of drafting effort, and legal complexity that is often out of proportion compared to the underlying reality.

At the inter-departmental or internal level: Commission departments often use service and cooperation arrangements for recurring operational purposes, such as the provision of support services. Here, one important problem is **inconsistency in naming, form and content** for instruments that should follow a common model. This can slow down internal cooperation, create unnecessary negotiation over standard clauses, and increase administrative burden. More importantly, there already is **a large body of agreements** even though the subject matter is just cooperation between parts of the same legal entity.

At the interinstitutional or external level: Between the Commission and EUIBAs, similar fragmentation also arises, but **with more complexity**. External arrangements may require more careful handling of governance, competences, budgetary responsibilities, liability, confidentiality, dispute settlement, data protection and reporting obligations, because they are more closely related to classical contractual relationships and exist in a politically charged environment. In these cases, the lack of a clear typology and standard approach can also lead to uncertainty about whether the chosen instrument matches the legal and operational reality of the relationship.

Proposed solution

The Commission should develop a core standardised template for service and cooperation agreements, supported by clearer central guidance and a limited set of justified variations. The goal is not to impose a single rigid instrument for all cases, but to create a common baseline that simplifies drafting and improves consistency.

At the centre of this recommendation is a **core template** with the essential clauses normally needed for service-type arrangements: purpose, scope, responsibilities of the parties, governance, financial provisions where relevant, duration, amendment, termination, confidentiality, data protection, liability and dispute handling. Around this core, the Commission could develop variations tailored to recurring use cases and the internal and the external dimension.

At the inter-departmental or internal level (arrangements between Commission departments): for internal agreements, the priority should be simplification and a reduction in numbers. A standard template should cover routine inter-departmental arrangements, with optional modules for financial transfers, shared service provision, or joint operational activities. The emphasis should be on enabling automation, reducing drafting diversity, avoiding multiple labels for the same type of act, and ensuring consistent use of budgetary and procedural rules.

In this internal setting, **de minimis rules** for low-value or low-risk arrangements could help avoid disproportionate formalisation.

At the interinstitutional or external level (arrangements between the Commission and another EUIBA): for external agreements, the same logic of standardisation should apply, but with greater attention to institutional specificities and legal risk. Here, the core template should serve as a baseline rather than as a fully uniform instrument. It should be clear which clauses are mandatory, which are optional, and which require adaptation depending on the counterpart, the legal basis, the budgetary implications and the nature of the services or cooperation concerned. The aim is to preserve flexibility where necessary, while still reducing divergence in drafting practice.

At both levels, BUDG should provide clearer and more operational guidance **on when to use an SLA or equivalent instrument** and on applicable requirements. This would help move from informal local custom to a more coherent Commission-wide practice ready for more automation.

Implementation

The first step should be to **map the instruments currently used across departments** for comparable types of service and cooperation arrangements. This exercise should find overlaps in denomination, recurring clause patterns, and the main points where current practice diverges from corporate guidance.

On that basis, the responsible legal and operational services should develop:

- a **core standard template** for service and cooperation arrangements
- a **small set of variations** for the most common scenarios
- a **practical typology** explaining which instrument is for which situation; and
- **updated guidance** on minimum content, approval pathways and proportionality

At the inter-department or internal level: implementation should focus on making routine cooperation easier. This should include standard clauses, default governance arrangements, and simplified procedures for low-value or low-risk cases. A pilot would be useful for assessing de minimis rules in selected administrative or support services before broader rollout.

To support this approach, **a standard digital service-provision support tool** should replace the current reliance on free-form documents and ARES registration. The tool would aim to automate and replace what today are hundreds of carefully crafted quasi-contracts.

At the interinstitutional or external level: implementation should focus on legal clarity and risk management, which becomes even more important with the **growth of interinstitutional service provision**. Templates should include stronger instructions on adapting clauses to the status of the counterpart and the nature of the arrangement. Model clauses would also be useful for issues such as budget implementation, audit, confidentiality, or responsibility-sharing.

A final implementation element should be communication and training. Departments will only use standardised tools consistently if they understand their purpose and practical benefits. Short guidance notes, annotated templates and targeted training for operational and legal staff will therefore be essential.

Executive summary Discontinuation and deprioritisation

Problem statement

“The essence of strategy is choosing what not to do”⁽⁴⁾. Deprioritising and discontinuing activities will free up time and resources for new tasks the Commission is requested to handle and for core tasks that only the Commission can do. This approach will make the organisation more agile and will allow staff to focus on what really matters and what has the greatest impact.

The EU has been confronted with a series of crisis situations and with geopolitical turmoil that pose new and unprecedented challenges. The Commission is called upon to respond to these challenges with new agendas and initiatives. The Commission is also increasingly used as a central enforcement power. To be a modern and efficient public administration and to implement new and unplanned initiatives, it is essential to move from ad hoc, implicit and limited deprioritisation to a structured, recurring and legitimised process to review the Commission’s existing activities and ensure they all remain in line with its core competencies or priority areas. This process should lead to decisions to discontinue a substantial number of activities or even policies. This would ensure that resources are available for new challenges or to reinforce core Commission functions, while preventing the workload from rising to an unsustainable level.

Recommendations

1. Recurrent decision points to discontinue/deprioritise non-core activities

The current approach to redeploying resources fails to drive meaningful and strategic shifts away from legacy, non-core and ‘no-longer-core’ priorities. At times, activities continue when they should not. Our proposed actions are to:

- establish a transparent, evidence-based process requiring all DGs to propose discontinuation/deprioritisation of a substantial number of activities and policy areas – focusing on principles e.g. EU added value;
- ensure political ownership of decisions to discontinue actions.

2. Link new initiatives to explicit discontinuation commitments

Resources are committed long term when the co-legislators agree on new initiatives. Past efficiency gains, while effective, are no longer enough and trade-

⁽⁴⁾ Porter, M.E., *What is strategy?*, Harvard Business Review, November-December 1996

offs are now essential to free up resources to launch ambitious new proposals and concentrate on impactful activities. We propose, therefore, to:

- mandate a 'stop-to-start' rule: for every new initiative requiring significant resources, the proposing DG, supported by the central services, must (early on) identify legacy activities to be discontinued. This step should be embedded in the process for new proposals, ensuring that the co-legislators see the resources trade-off and commit to stopping activities.

3. Set common reduction targets for low-impact recurring activities

Many routine activities and outputs (e.g. reports) consume a disproportionate amount of resources. The volume of such routine activities has grown unsustainably. Our proposed action is to:

- impose a major reduction target for low-impact recurring activities, which should be addressed in the deprioritisation plans of DGs.

4. Eliminate duplication

Over time, the Commission has developed overlapping structures and tools, including in parallel with those of other institutions. We propose, therefore, to:

- task the Internal Audit Service with identifying recurring parallel structures, and with proposing solutions to the Corporate Management Board;
- require DGs to identify and address overlaps and duplications in their deprioritisation plans, in dialogue with other DGs concerned;
- conduct a systematic screening of the Commission's digital tools, requiring DGs to discontinue certain tools and to justify the retention of overlapping tools. This screening should be coupled with stronger central governance by the Information Technology and Cybersecurity Board.

5. Create enablers to embed a culture of discontinuation and deprioritisation

The key enabler of change is a shift in mindset. Staff and management also need incentives, tools and leadership support to normalise discontinuation and deprioritisation. Our proposed action is to create enablers, in particular through:

- a cultural shift that supports openness to discuss and propose discontinuation both at the political and technical level;
- organisational agility (make it easy to change) and providing staff with the support needed to manage change;
- better tools and evidence to help DGs to review and deprioritise activities.

Recommendations on discontinuation and deprioritisation

Following a series of crisis situations and geopolitical turmoil the EU is confronted with new and unprecedented challenges. This translates into new tasks for the Commission, which are not matched by new staff allocations. For example, for 87 legislative proposals between January 2021 and June 2025, the Commission demonstrated the need for additional staff amounting to 1 666 full-time equivalents (FTEs). However, staffing levels did not increase substantially: the co-legislators granted only 9% of the staff resources needed. At the same time, the Commission continues to implement tasks and support policy areas which were agreed previously.

Past efficiency gains, while effective ⁽⁵⁾, are no longer enough. To free up capacity for new initiatives, the Commission should discontinue and deprioritise tasks that have become less important with time and streamline the delivery of the remaining ones. Members of staff have also repeatedly highlighted the need to identify what to stop doing in the comments made to the suggestion box that is part of the large-scale review.

With the current set of recommendations, we seek to embed efficient processes and a culture which will lead to strategic and actionable decisions on discontinuation and deprioritisation. These would range from decisions on individual processes and activities to strategic decisions on entire policy areas, with the ultimate goal of making sure that Commission colleagues are working on what matters.

Recommendation 1: recurrent decision points to discontinue/deprioritise non-core activities

The European Commission operates in an increasingly complex environment, with finite resources but an increasing number of priorities. Without a structured approach to strategically discontinuing or reducing activities with little impact, the Commission risks undermining its ability to deliver on political priorities.

We therefore propose a mandatory and continuous deprioritisation framework. This framework would force DGs to make strategic choices and would require all DGs to identify and propose discontinuing or scaling back activities that: (i) no longer align with the Commission's political priorities; (ii) lack EU added value;

⁽⁵⁾ For example: to enable the implementation of additional tasks, between 2016 and 2024, the Commission introduced the Synergies and Efficiency Initiative, aiming to modernise its support functions and reduce duplication and costs. Savings equivalent to 802 FTEs have been achieved by pooling resources and redeploying staff.

(iii) can be better carried out by another institution or actor than the Commission; or (iv) which duplicate efforts. This would free up resources for high-priority areas by reducing the number of existing actions, while preventing the workload from increasing.

Problem statement

The current system of staff allocation relies on ad hoc, incremental ‘taxation’ (a 1% annual reduction in staff). This has made it possible to free up some resources for the many new initiatives that the Commission has proposed in recent years, but with some important downsides:

- Insufficient strategic discussions: there are insufficient strategic discussions on the policies or activities that should be stopped. DGs often treat the 1% reduction as a bureaucratic exercise (freezing posts that are vacant, penalising units that encourage internal mobility), often absorbing cuts by increasing workload rather than taking decisions to stop activities.
- Lack of incentives: DGs face resistance from stakeholders when they propose to discontinue activities (stakeholders include members of staff, the political level of the Commission, Member States and the European Parliament). Rigid budget allocations, fixed taxation and the lack of internal incentives to discontinue an activity are significant hurdles to stopping activities.
- Insufficient scale: the 1% annual taxation is too limited for the many new initiatives and actions that are entrusted to the Commission.

Proposed solution

We propose a bottom-up strategic framework which would require all DGs to systematically review their portfolios and make concrete proposals on activities to be deprioritised and discontinued. The core principles and elements of this process would be:

- Mandatory participation: all DGs must submit a deprioritisation plan, either individually or jointly as part of a cluster. For activities driven by central services but implemented by other DGs, the central services should include those tasks in their deprioritisation plan. In the first implementation cycle, deprioritisation plans should focus on activities within the Commission. In subsequent cycles, they may also include activities carried out by decentralised agencies or other EU bodies.
- Timing: a bottom-up framework that drives significant decisions will consume substantial resources to plan and implement. Therefore, we consider that a ‘deep-clean’ exercise should be carried out every five years

or so (aligned with Commission mandates), with annual monitoring integrated into the discussions on complementary staff allocations. However, the first exercise can already take place in 2027, driven in part by the new multiannual financial framework, which will necessitate substantial changes to the activities of several Commission departments.

- **Substantial targets:** plans must propose to discontinue/reduce activities to free up a substantial percentage of staff. This will result in a more rigorous analysis of all activities, to the extent that it can address (part of) specific policy areas. Not all proposals identified by DGs will necessarily be implemented; central decision makers (the Corporate Management Board in an advisory capacity, and the College of Commissioners) will ultimately decide which proposals should be implemented. Central decision makers should ensure that activities are stopped to free up a substantial number of FTEs ⁽⁶⁾. Whether this objective can be achieved will also depend on the co-legislators agreeing to changes (amending or possibly repealing existing legislation).
- **Criteria-driven:** decisions should be based on key criteria such as EU added value, subsidiarity and alignment with political priorities. Decisions should also be taken to avoid duplicating tasks across the Commission. DGs will decide themselves, after validating with their respective Commissioner, on the activities to be included in their deprioritisation plans. A voluntary questionnaire based on these criteria (see annex) is provided to support DGs in their analysis and internal discussions.

The table below sets out, at a high level, how the proposed process would work in practice:

Step	Action	Timing for output	Actors
1. Kick-off	Discussion in DGx meeting to identify the strategic areas where discontinuation and deprioritisation can/should focus	N	Directors-General
2. Mapping, and development of a plan	DGs map their activities and identify activities to be deprioritised or discontinued and deprioritised. A voluntary questionnaire can guide discussions	N + 3 months	Directors-General

⁽⁶⁾ An appropriate number could be based on the number of FTEs needed for new tasks entrusted to the Commission (based on resources indicated in legislative proposals in preceding years).

3. Internal validation of the plan	DGs propose discontinuation/deprioritisation plans to their Commissioner(s)	N + 4 months	Directors-General
4. Peer review	Cross-DG consistency check to identify overlaps and gaps in discontinuation/deprioritisation plans	N + 6 months	Directors-General grouped in a cluster
5. Central decision	Corporate Management Board assesses proposals. The College decides which proposals to implement, balancing political and operational trade-offs	N + 8 months	Review (including Legal Service and the SG) to inform the central decision
6. Implementation	Legal changes: launch better regulation process to amend or repeal acts (incl. possible negotiations with the co-legislators)	Differs case by case	DG-led (support from SG)
	Other changes: to be implemented immediately. Some may require more substantial changes in the organisation of the DG (new organisation chart, changing posts)	N +10 months or more	DG-led
7. Monitoring	Annual budgetary hearings track progress; with possible adjustments depending on progress. Successful implementation of actions to be reflected in staff allocation (a percentage of staff should be retained within the DG to reinforce the policy by other actions and to incentivise discontinuation ⁽⁷⁾)	Annually as part of the process of complementary staff allocation (budget hearings)	Monitoring by DG BUDG, SG, DG HR

⁽⁷⁾ Similarly, if a DG does not engage in a genuine exercise to identify discontinuation in their DG it should not have access to the complementary staff allocation and should be subject to a fixed taxation. This will also ensure that appropriate incentives are in place to discuss and propose discontinuation actions.

Recommendation 2: link new initiatives to explicit discontinuation commitments

With ambitious new priorities demanding significant levels of staffing (and budget), the Commission must make explicit trade-offs to avoid implementation failures and an increase in workload to an unsustainable level. To address this, we recommend applying a 'stop-to-start' rule: for every new initiative requiring significant resources, activities to be discontinued or deprioritised should be identified at an early stage in the process. This would shift the Commission's approach from 'doing more with less' to also 'doing what matters most, by stopping what matters least'.

Problem statement

Today, new initiatives are often proposed asymmetrically across DGs, without a clear plan for how they will be resourced. In addition, changes during the legislative process might translate into substantial extra work for the Commission (e.g. where the Commission is required to be the central enforcer of new rules). While DGs need to indicate staffing needs for new initiatives, new staffing resources are in most cases not granted to the Commission i.e. resources come from redeployment within a DG or from a central pool. This leads to:

- overcommitment: DGs take on new tasks without shedding old ones, creating bottlenecks and burnout;
- erosion of credibility: the Commission risks failing to deliver on its political priorities and core tasks due to chronically overstretched staff;
- limited ownership in addressing staffing issues for new initiatives: in practice this is often only discussed after a new initiative enters into force.

Proposed solution

Our core recommendation is to embed an obligatory 'stop-to-start' requirement for all new initiatives or changes to initiatives with significant resource implications (i.e. more than 10 FTEs across the Commission). This rule embeds discontinuation and deprioritisation into the impact assessment process for new (legislative) proposals, ensuring that:

- the co-legislators see the full resource trade-off upfront, making them more committed to the need to stop activities;
- resources are freed up proactively and strategically rather than through ad hoc cuts;

- new legislative initiatives are only be approved if they are fully resourced, ending the cycle of overcommitment: the Commission should not accept additional tasks unless there is agreement to discontinue other activities. This will increase the effectiveness of the implementation of any new initiative.

More concretely, the 'stop-to-start' requirement would mean that:

- At an early stage in the preparations of the new proposal the proposing DG must identify legacy activities to discontinue. The central services must accompany this process and ensure that the necessary trade-offs are made within the Commission. The tasks to be discontinued should also be outlined in the documents of the proposal (including the legislative, financial and digital statement).
- The proposal for discontinuation should accompany the new initiative, ensuring the co-legislators see the full trade-off made by the Commission.
- If, during the negotiation process, the Council and/or European Parliament require the Commission to take up a substantial set of new tasks, they should either agree on extra resources for the Commission or identify the discontinuation of legacy files.
- Approval of the new initiative should be contingent on approval of the deprioritisation actions, creating political ownership of any trade-offs. Sunset clauses for any new initiative should be the default baseline.
- When implementing changes to internal processes or establishing new (common) internal processes within the Commission, a structured feedback loop among resource directors should identify and discuss the expected impact on resources and existing structures. Similarly, activities should be discontinued when the workload is increased. The lead DG introducing the change to internal processes should lead the process to identify the activities to be discontinued.

How it would work:

Step	Action	Actors
1. Early scoping	The DG identifies resource needs for the new initiative and potential activities to be discontinued. If the DG cannot identify these, central services (SG, DG BUDG) should identify which activities could be discontinued in different DGs.	Proposing DG(s) and political level (Commissioner)
2. Impact assessment	The DG includes the new initiative in Decide and starts to prepare the new proposal. Relevant references should be made to activities that would be discontinued (e.g. in the legislative financial and digital statement).	Proposing DG(s) and central services
	If discontinuation requires legislative changes, the appropriate package (incl. an impact assessment) is to be prepared by the relevant DG.	Proposing DG(s), SG
3. Scrutiny	The Interservice Steering Group and interservice consultation are organised to discuss/review proposals. The Regulatory Scrutiny Board (RSB) reviews the proposals.	Proposing DG(s), SG, RSB
4. Political validation	The College approves the bundled package (new initiative plus deprioritisation).	Political level
5. Legislative link	The deprioritisation plan is presented to the co-legislators as part of the initiative, with legal changes bundled where necessary. If, during the legislative process, the Council and the European Parliament propose extra tasks for the Commission, the Commission should only accept such extra tasks if they are accompanied by additional resources or additional activities to be discontinued.	Proposing DG(s)

Recommendation 3: set common reduction targets for low-impact recurring activities

At a time when the European Commission faces pressing challenges and limited resources, a significant portion of time and effort remains tied up in recurring, low-impact activities (as also illustrated by the examples sent to the suggestion box for the large-scale review).

Problem statement

Many routine actions, outputs and processes persist due to habit, tradition, or outdated ways of working rather than because of genuine need. As they often lack strategic impact, they receive little attention from senior management, leaving resources tied to activities with a lower impact.

Proposed solution

Each DG should conduct a critical review of all its low-impact recurring activities as part of the deep-cleaning exercise (Recommendation 1; see also the voluntary questionnaire focusing on levels 3 and 4 on these aspects). More specifically, the following activities should be targeted by this critical review:

- activities in terms of monitoring and reporting (incl. implementation reports, newsletters, internal tracking tools),
- recurrent communications, strategies and action plans,
- recurrent conferences and events,
- prizes or other financial management actions with a more limited impact (e.g. technical assistance, capacity building for actors that can be better served at the national or local levels),
- routine meetings.

We propose that DGs should make **a major reduction** in the resources devoted to these activities by exploring the following options:

- **Discontinue:** propose to discontinue activities that no longer serve a clear purpose (i.e. which are not aligned with the Commission's objectives) and which are not mandatory.
- **Reduce frequency:** if discontinuation is not possible, shift from an annual to a multiannual approach and merge different activities (with a preference for single tasks covering various objectives).
- **Streamline the content/reconsider the format:** reporting is often associated with a document with (extensive) explanations that may often

go unread. There is a need to shift from lengthy reporting to focused and relevant messages on key achievements, adjusting the format accordingly. A dashboard or visual presentation may be sufficient to assess whether the objective was achieved, while including concise explanations only when that achievement is at risk. If the dashboard can be automatically linked to the source of the data, further resource gains can be made.

For some common (reporting) activities, DGs cannot decide themselves which reports to discontinue or streamline. The obligation to discontinue or streamline such reporting activities should be included in the deprioritisation plans of the respective central service. DGs should contribute to this discussion (as part of the peer review of Recommendation 1), including by communicating to central services the resources that are tied up with these activities. This will increase awareness among the 'owners' of this activity of the respective impact on resources.

Recommendation 4: eliminate duplication

A Commission in which resources are concentrated on the most impactful actions, where responsibilities inside and messages to the outside are clear, will not only be more efficient at what it does, it will also be a more inspiring place to work. Removing overlaps and duplications is an important step in getting there.

Problem statement

Sometimes, DGs develop duplicative, overlapping and/or parallel structures, initiatives or tools. Examples of parallel structures include:

- international units (which include several hundred FTEs) in policy DGs, partially overlapping with the work in foreign policy DGs,
- the Joint Research Centre's directorates focusing on research of specific policy areas covered by policy DGs,
- 'mirror' units in DG RTD and more industrial-policy oriented DGs,
- structures for the implementation of processes such as Strategic Planning and Programming, with great potential for simplification,
- overlaps between the Commission and other institutions such as decentralised agencies,
- several DGs also have country desks or collect and manage country knowledge, data and indicators separately within their policy domains.

These overlaps are present not only in organisational structures, but also in substantive measures. Overlapping initiatives in the body of EU laws (*'acquis'*) consume considerable resources and can lead to conflicting obligations. Examples include public procurement rules (contained in over 60 pieces of legislation, now being rationalised), due diligence requirements and financing for areas such as housing or SME advisory services and capacity building.

IT systems and digital solutions offer particularly striking examples of duplication and fragmentation of policy and business competencies in the DGs. The resulting proliferation of overlapping tools, databases and dashboards generates avoidable expense in development, maintenance, operation and training.

Room for experimentation and new ideas should be maintained, which can entail some temporary overlap and duplication. This is an important source of innovation. However, after a limited period, a decision should be taken about which approach is preferable and which other approach should be discontinued.

Proposed solution

We propose a systematic approach towards reducing overlaps and duplications through the following actions:

- Task the Internal Audit Service, with support from SG and DG HR, to identify parallel structures and tools in different DGs dealing with a policy issue, proposing a lead DG where expertise or resources should be centralised or, possibly, using cross-DG teams. Based on the identification of specific structures, DG HR and SG should propose solutions to the Corporate Management Board to reduce overlaps. More specifically:
 - As a first step, the Internal Audit Service could focus on the more substantial/recurring overlaps such as country desks, foreign policy teams or research policy teams. For example, for research policy, it could be possible to centralise expertise and make it more readily available for policy DGs. In several cases, this expertise is now split between the policy DG, DG RTD and the Joint Research Centre.
 - Subsequently, proposals can be made to centralise expertise which is now split across several departments.
- Identify and reduce overlaps, including on country desks, foreign policy or research, as part of DGs recurring deprioritisation plans. In assessing the possibilities for deprioritisation, DGs should also look at the role of other bodies (e.g. decentralised agencies) in their area of expertise. When an overlap or duplication is flagged, a solution should be proposed by the DG(s) concerned. This may require a decision by more than one DG.

- Reduce the number of overlapping structures for stakeholder engagement (expert groups, industrial alliances, partnerships, joint undertakings etc.), which are frequently redundant or at least overlapping significantly. For instance, many expert groups deal with automotive innovation from different angles (DGs CNECT, GROW and RTD) and could be merged: this would also presuppose a closer coordination of those tasks within the Commission.
- Conduct a systematic screening of the Commission's digital solutions, requiring DGs to discontinue, consolidate or migrate solutions flagged for replacement and to justify the retention of overlapping tools. This effort should be coupled with stronger central governance of the digital estate: clearer coordination between DG DIGIT as provider and the policy DGs as developers (notably on artificial intelligence and large language model-based tools). Progress should be monitored based on tangible deliverables and metrics, with an extension of the role of the Information Technology and Cybersecurity Board in resource allocation beyond the administrative budget heading to enforce decisions. The definition of priorities for the review and digitalisation effort should be closely coordinated with the relevant central services to avoid duplicating work and to ensure strategic alignment.
- Centralise country knowledge, independent of policy domains. In the same way, set up centralised data hubs and knowledge repositories (wikis) accessible to all DGs.
- Creating more flexible portfolios, where Commissioners carry out specific missions assigned to them, relying on resources from different DGs, could reduce the need for parallel structures. This approach could address a proliferation of political mandates, which can be a barrier to deprioritisation, especially if Commissioners perceive a need to have specific capabilities within 'their' department.
- Create a stronger culture of co-creation and cooperation at senior management level. Task-based, temporary structures crossing DG boundaries rather than area-based structures can also help (e.g. the creation of task forces on start-ups and scale-ups and on housing has helped tackle new, cross-cutting challenges).

Recommendation 5: create enablers to embed a culture of discontinuation and deprioritisation

Discontinuation and deprioritisation are not only analytical exercises: they are organisational change processes that require the right conditions to succeed. This chapter sets out the key enablers the Commission needs to make stopping or scaling down activities feasible in practice, and to ensure that the resources released can be reallocated swiftly to emerging priorities. It focuses on three categories of enabling conditions: (i) a cultural shift that supports an openness to discuss and propose discontinuation at all levels of the Commission; (ii) organisational agility and support to staff in managing the change; and (iii) better tools and evidence to help DGs take informed decisions on what to discontinue.

a) Cultural shift

Problem statement

To ensure that recommendations on embedding discontinuation and deprioritisation into administrative processes are effective, discontinuation cannot remain a purely technical exercise: it also needs to be integrated upstream in political discussions. The College and individual Commissioners need to be aware of – and accountable for – the resource implications of their decisions.

More fundamentally, this points to a broader cultural shift. Instead of asking ‘How much can we do with the resources available’, a more sustainable approach would be to ask, ‘What is the minimum intervention needed to achieve the intended result?’. This requires a shift in mindset towards prioritisation, proportionality and discontinuing what no longer adds sufficient value.

Proposed solution

Our proposed actions are:

- Mission letters for Commissioners should not only set priorities for the five-year mandate but also specify which activities should be deprioritised or stopped;
- Discontinuation considerations should also be integrated into the annual Commission Work Programme, shifting the focus from adding priorities to actively managing trade-offs.

To embed a cultural shift across the organisation, we also propose to mainstream discontinuation and deprioritisation actions by:

- including discontinuation options in the annual management plans of DGs;
- introducing negative pilots: identify activities to stop, set out the necessary preparations, assess the impact after one year, and then scale up where appropriate;
- providing staff with regular and ad hoc opportunities to suggest activities for discontinuation;
- making discontinuation conversations a standard element of appraisal dialogues;
- rewarding competences related to prioritisation, risk tolerance and the management of discontinuation processes;
- developing EU Learn modules for staff and managers on prioritisation, risk tolerance and discontinuation processes.

b) Organisational agility and support to staff in managing the change

Problem statement

Becoming more agile – and reallocating resources quickly to new priorities – requires more flexible organisational structures. This includes the ability to create and dissolve teams and reporting lines rapidly, sometimes on a temporary basis, and to adjust structures when activities are discontinued or deprioritised.

Next to organisational agility, change also needs to be managed from a human resources perspective. Without proper training or additional support, it will be impossible to transform the organisation. Not all staff will be willing or able to move to new policy domains or adapt to new working environments. Experience from previous reorganisations and major change projects suggests that some staff may struggle to adapt and may become disengaged if change is not actively managed.

Proposed solution

Our proposed actions are to:

- Revise the 2017 Communication on Organisation Charts, which contains outdated benchmarks for unit/directorate size and involves cumbersome decision-making and adoption procedures. Temporary structures should have an end date. Reorganisation decisions should be delegated to the lowest appropriate level. If a reorganisation requires a College decision, validation and implementation should take no longer than two months (and

should be considerably faster when only an SG/DG HR opinion or a simplified procedure is needed).

- Make more use of temporary structures and initiatives (with sunset clauses). A lot can be learnt from current experiences with temporary task forces such as the ones on housing, start-ups and scale-ups, and competitiveness. The way these taskforces were designed and staffed differs, and these differences have an impact on delivery.
- Assess the costs of training, disengagement and change support measures, and compare them with the benefits of freeing posts for reallocation to priority areas. Consider making full use of the existing early retirement scheme when substantial changes are implemented (Articles 42c and 50 of the Staff Regulations).
- Consider creating a pool of flexible staff that can be easily allocated to temporary structures or tasks.

c) Tools and evidence to support DGs' reviews and decisions on what to discontinue

Problem statement

Discontinuation and deprioritisation are difficult to implement without a reliable overview of what the Commission does, how it does it, and what resources this requires. A stronger evidence base helps to identify activities that can be stopped and to quantify the human and financial resources that could be freed up.

Proposed solution

Our proposed actions are to:

- Fully implement an acquis-screening IT tool that can help DGs to identify the key reporting requirements included in legislation. This is essential for those DGs handling greater volumes and complexity in terms of legislation.
- Use the voluntary questionnaire (in annex) if DGs need support to review their activities. The questionnaire can help DGs screen policy areas and activities by applying key criteria such as EU added value, subsidiarity or alignment with political priorities.

In conclusion, the proposed recommendations would ensure operational sustainability. By creating a balance between long-term duties and new political priorities, these measures will allow the Commission to maintain its high standards of delivery on both fronts.

Annex: Voluntary questionnaire - Helping you strategically to discontinue and deprioritise

In large policy-making bodies such as the Commission, **new activities are frequently added** in response to political priorities, crises and stakeholder demands, **while existing activities tend to continue** unless explicitly reviewed. Over time, this accumulation can fragment organisational attention, stretch coordination capacity and dilute impact.

Prioritisation and deprioritisation are integral parts of effective strategic management in any complex organisation. Deprioritisation should therefore not be understood as cost cutting or retreat, but as a **deliberate process of rebalancing effort** to maintain strategic focus and public value.

Aim of this tool

The aim is to foster in each **DG a culture of discontinuation and deprioritisation**. The questionnaire below is designed to be used on a voluntary basis to help identify, evaluate and deprioritise low-yield or legacy activities. It gives you a structured tool to help you divest from lower-value actions, in order to be able to strategically reallocate core human capital towards higher-impact actions.

This tool aims to stimulate strategic discussion. It is not intended to lead to any written output or reporting by the DGs.

How to use this tool

Rather than relying on ad hoc adjustments or subjective criteria, this methodology operates as a **cascading tool structured across four interconnected layers**: policy areas (e.g. cultural policy, housing policy, urban policy, etc.), activities or policy initiatives depending on the type of the DG (e.g. legislation, financial support), actions and outputs (reports, communications, implementation checks) and processes.

It is a methodology for internal use within your DG: if one of the layers does not apply to you, you can simply move on to the next.

It is recommended to define the policy areas, activities or policy initiatives in line with the Management Plan and Annual Activity Report of your DG.

Outputs and processes should be defined at a practical level of granularity to **avoid excessive administrative burden**.

This methodology uses colour-coded logic designed to fast-track the assessment and to facilitate the final decision at the end of each level (red and dark red – difficult to discontinue/deprioritise; orange – worth analysing further to determine whether there is some room for discontinuation/deprioritisation; green – good candidate for discontinuation/deprioritisation).

LEVEL 1: Policy Areas - If discontinued at this level, all matching activities outputs, and processes stop, either immediately or over a transition period.

- **Criterion 1: Legal Obligation**

1. Which of the following best describes the legal obligation behind this policy?

☐ **Primary legal obligation:** the Commission is directly and explicitly compelled to act by specific Treaty provisions acting as 'guardian of the Treaties'. Discontinuation requires Treaty reform.

☐ **Secondary legal obligation:** the obligation to act is strictly imposed by specific EU secondary law (Regulations, Directives, decisions). Discontinuation requires legislative repeal/amendment of the underlying secondary law.

☐ **Interinstitutional mandate:** the policy is driven by a formal, politically binding request from another EU institution, such as a European Parliament resolution or a Council request. Discontinuation requires high-level interinstitutional justification.

☐ **Conditional obligation:** the legal basis requires acting only when specific criteria, deadlines or conditions in existing legislation are fulfilled (e.g. rule of law conditionality, review clauses for evaluation by a specific year, emergency responses, etc.). Discontinuation will need to be explained, in particular in situations where the triggers to act or the legal conditions requiring the Commission to act are clearly fulfilled.

☐ **Enabling competence with broad executive discretion:** the Commission has a legal obligation to act in principle but has broad discretionary powers regarding *if, when and how* to act (e.g. Commission is guardian of the Treaties but has a large discretion as regards which cases to pursue.) Discontinuation requires a political decision.

☐ **No legal obligation**

- **Criterion 2: Political Alignment**

2. Does this policy reply to a political priority?

☐ **Current political priority:** the policy is driven by the current Commission's political guidelines, the annual Commission Work programme, recent priorities of the President or mission letters of the Commissioners. Discontinuation requires a political decision.

☐ **Legacy political priority:** there is no legal obligation, the policy stems from priorities, strategies or White/Green Papers of previous years or previous Commission mandates. This is a primary candidate for discontinuation, but it may still require a political decision.

☐ **No.** Primary candidate for discontinuation, no political decision needed.

- **Criterion 3: Subsidiarity Principle**

3. Is the Commission the best placed to deliver this policy with reference to subsidiarity (could this be more appropriately handled by Member States, regions, or other stakeholders)?

- ☐ Yes, Commission action is justified and necessary at this level
- ☐ Unclear, requires further analysis
- ☐ No, this would be more appropriately handled elsewhere

- **Criterion 4: Shared Portfolio / Lead Service**

4. What is this DG's role in implementing this policy?

- ☐ Sole lead, this DG has full responsibility. Continue the assessment.
- ☐ Co-lead, shared formal responsibility with another DG (which one?). Discontinuation requires joint agreement between leads before proceeding.
- ☐ Contributing service, another DG is the lead; this DG contributes a specific activity or input. Assess only this DG's contribution; the overall policy assessment belongs to the lead DG.
- ☐ No role, this policy is no longer implemented by this DG at all.

- **Criterion 5: Strategic Impact of exit & Transition**

5. What are the immediate liabilities of stopping?

- ☐ Low/No liabilities
- ☐ Manageable contract terminations
- ☐ High financial/legal penalty

6. If this policy were stopped, who would oppose it, and how significant would that opposition be? (the 'scream test')

- ☐ Nobody, no significant political reaction expected
- ☐ Limited opposition, a few stakeholders or Member States, manageable through standard communication
- ☐ Significant opposition, Parliament, Council, Member States, or organised stakeholder groups likely to react strongly

7. What are the administrative and transition costs of stopping this policy? (e.g. reassigning staff, decommissioning specialised IT platforms, and managing communication strategies to handle stakeholders' pushback).

☐ Easy reallocation (low transition costs)

☐ More than six months transition (medium transition costs)

☐ Prohibitive transition effort (high transition costs)

8. Are there strategies in place to manage the transition effectively?

☐ Yes (if so, what are they?) ☐ Partially, needs development ☐ No

9. If the Commission stops implementing this policy area, what is the long-term cost of non-action to the EU?

☐ Negligible impact (others will fill the gap)
systemic failure

☐ Moderate impact ☐ Severe

Final decision end Level 1 (chose one option only)

☐ **Option A: STOP IT** – action: cancel the policy and all its activities -> stop here

☐ **Option B: TRANSFER IT** – action: transfer to lead/another DG/body -> stop here

☐ **Option C IMPROVE IT** – action: redesign policy -> go to Level 2

☐ **Option D: KEEP IT AS IT IS** – action: change nothing -> stop here

LEVEL 2: Activities or Policy Initiatives: Operational focus that allows shifting resources to higher-value actions. Activities or policy initiatives are strictly linked to policies. Evaluate only those tied to policies continuing after level 1 assessment.

- **Criterion 6: Subsidiarity & Institutional Overlap:** Is this policy initiative or activity performed or better implemented in other services within the Commission, or can it be taken up by Member States/other organisations/external contractors?

10. Is the Commission best placed to run this specific policy initiative or activity, considering subsidiarity (could this be more appropriately handled by Member States, regions or other stakeholders)?

☐ Yes, Commission action is justified and necessary at this level

☐ Unclear, requires further analysis

☐ No, this would be more appropriately handled elsewhere

11. Is this policy initiative or activity performed in other services within the Commission?

☐ Yes (if so, which?) ☐ Yes, how many FTEs are involved in this activity in the other DGs (if known) ☐ No

12. Would this policy initiative or activity be better implemented in another DG, while making sure that all DGs have a possibility to contribute via the normal interservice consultation process?

☐ Yes (if so, which?) ☐ No

13. If the Commission stops this policy initiative or activity, can it be taken up by:

☐ Another EU body or institution ☐ External contractors under the supervision of the Commission ☐ Member States, inter-governmental bodies, associations, etc.

☐ No, cannot be taken up externally

14. If the Commission were to externalise this policy initiative or activity following the reply to Q10, would the level of resources to be used inside the Commission for its supervision justify its externalisation?

☐ Yes, fully ☐ Yes, partially ☐ No

- **Criterion 7: Return on Effort & Performance:** return on effort measures efficiency by comparing the human resources invested against the actual value produced based on objective evidence of use by stakeholders (e.g. active users, data downloads, stakeholders' feedback, etc.)

15. Does this policy initiative or activity have a defined owner and a specific objective in the annual Management Plan?

☐ Yes ☐ No

16. Based on the current performance metrics and KPIs, is there evidence demonstrating that this policy initiative or activity shows clear success, and that it is better implemented by the Commission than it would be by a Member State?

☐ Yes, metrics show that benefits are substantially higher because the Commission implements it

☐ Partial evidence, success is unclear, or the benefit over a national approach is limited

☐ No clear evidence and no added value over Member State action

17. What is the main benefit this policy initiative or activity provides to Member States or citizens?

☐ Economic (e.g. lower costs, harmonisation of rules, etc.): describe briefly in one sentence

☐ Administrative (e.g. simpler rules, less red tape for national/regional authorities, etc.): describe briefly in one sentence

☐ Strategic (e.g. solving cross-border obstacles, crisis response, etc.): describe briefly in one sentence

☐ Communication (e.g. buy-in, outreach, visibility, understanding of the EU): describe briefly in one sentence

☐ None

18. How many FTEs are involved in delivering this policy initiative or activity?

☐ Less than 5 FTE ☐ 5-20 FTE ☐ 20-50 FTE ☐ more than 50 FTE

19. Do you consider that the human resources invested in this policy initiative or activity are proportionate to its value?

☐ Low cost ☐ Proportionate ☐ Somewhat disproportionate ☐ Clearly disproportionate

20. Considering the total cost of this policy initiative or activity (staff, financial cost) against the benefits it delivers, how would you assess the overall cost-benefit ratio?

☐ Positive, benefits clearly outweigh costs, with existing evidence ☐ Neutral, benefits and costs are balanced or insufficient evidence to conclude ☐ Negative, costs outweigh demonstrable benefits

Final decision end Level 2 (chose one option only)

☐ **Option A: STOP IT** – action: discontinue policy initiative or activity and reallocate FTEs -> stop here

☐ **Option B: TRANSFER IT** – action: transfer to another DG/body or externalise -> stop here

☐ **Option C IMPROVE IT** – action: reduce resources and scope -> go to Level 3

☐ **Option D: KEEP IT AS IT IS** – action: change nothing -> stop here

LEVEL 3: Actions & Outputs: An action is a type of work activity, sometimes recurring, through which a policy initiative is delivered (e.g. transposition checks, evaluations, stakeholder consultations, infringement monitoring, etc.). An action typically generates multiple individual outputs over time (e.g. one transposition check per Member State, etc.). Outputs are the individual, countable deliverables produced by an action. For the purpose of this analysis, you should group outputs by type of action (e.g. transposition checks, implementation reports, evaluations) before assessing them individually. Even if a policy initiative or an action is maintained, outputs can still be stopped (e.g. cancelling 3 out of 10 reports). Evaluate only actions and outputs that passed Level 2.

- **Criterion 8: Actions & Outputs' Legality & Volume:** Out of the actions and outputs delivered each year, which of them are still necessary or linked to a legal obligation? If one of them is delivered more than once a year, is it legally justified and is the legal risk of stopping it significant?

21. Is this type of action (e.g. transposition check, etc.) still a necessary or useful way to deliver the policy initiative, independently of how it is currently resourced or how many outputs it produces?

☐ **Yes, this action type remains necessary or useful**

☐ **Partially useful in principle, but the current approach may need rethinking**

☐ **No, this action type is no longer necessary**

22. How many outputs are delivered each year in respect of this action?

Open reply for description where applicable

23. How many of these outputs are linked to a legal obligation?

☐ **100% linked to a legal obligation** ☐ **partially linked to a legal obligation** ☐ **0% no legal obligation**

24. Is the legal risk of stopping this output significant?

☐ Yes, significant ☐ Medium ☐ No, low or no legal risk

25. How many of these outputs are linked to an obligation coming from the central services?

Open reply: describe briefly in one sentence

26. If some outputs are delivered more than once a year, is it justified by a legal obligation?

☐ Yes ☐ No ☐ N/A

- **Criterion 9: The 'Scream Test' & Impact:** If you stop delivering this specific output, who would complain, how significant is the stakeholder impact, and do you have strategies to manage the transition?

27. If you have to stop delivering this output, who would complain? (the 'scream test')

☐ Nobody ☐ Very few stakeholders ☐ A significant number of stakeholders

28. Name up to three outputs from this activity you could stop tomorrow without significant consequence to stakeholders or legal obligations.

☐ Outputs (please name them) ☐ Hard to name

29. If this output were deprioritised or discontinued, how significant would the impact be on internal and on key external stakeholders (e.g. the public, businesses, Member States authorities, etc.)?

☐ Significant external impact ☐ Mixed external and internal impact ☐ Primarily internal impact ☐ Limited impact

30. How can risks associated with discontinuation be mitigated?

☐ No mitigation possible ☐ Easy mitigation available

31. Are there strategies in place to manage the transition effectively?

☐ Yes (describe briefly) ☐ No

- **Criterion 10: Evidence of Value & Use** - Do you have objective evidence/metrics about the impact of the outputs on the targeted population?

32. What is the 'return on effort' comparing the number of FTEs to the value or the significance of the output delivered (including administrative support)?

☐ Low, FTE investment is large relative to the significance or use of the action's outputs ☐ Medium, FTE investment and output significance are roughly proportionate ☐ High, FTE investment is small relative to the significance and reach of the action's outputs

33. Do you have objective evidence about the impact of the outputs on the targeted population (e.g. for legislative acts – level of impact on the population/market or financial coverage; for policy guidance, reports, annual activity reports, studies, TA deliverables or digital platforms – metrics of use/download, feedback surveys, etc.)?

☐ Yes, please indicate the evidence for each output ☐ No

34. Are similar outputs delivered by other DGs?

☐ Yes ☐ No ☐ Don't know

Final decision end Level 3 (chose one option only)

☐ **Option A: STOP IT** – action: discontinue output and reallocate FTEs -> stop here

☐ **Option B: TRANSFER IT** – action: deprioritise the output (number, frequency or scope) -> stop here

☐ **Option C IMPROVE IT** – action: automate or modernise -> go to Level 4

☐ **Option D: KEEP IT AS IT IS** – action: change nothing -> stop here

Level 4: Processes efficiency - Optimisation and simplification. The work is not stopped, but internal steps are streamlined to avoid errors or excessive validation. Evaluate only processes supporting actions or outputs that passed Level 3.

- **Criterion 11. Legacy & Efficiency Check** - Is this process efficient, is it duplicated in another DG/Member State, or is it a 'legacy process' created to solve a problem that no longer exists?

35. Is this process efficient? (What is the 'return on effort'? as described above)

☐ Yes ☐ No

36. Is this process also performed in another DG or in a Member State?

☐ Yes ☐ No

37. Is this a 'legacy process' which was created to solve a problem which do no longer exists?

☐ Yes ☐ No

38. Does this process have a natural end date (e.g. end of programming period)?

☐ Yes ☐ No

- **Criterion 12: De-layering & Validation Controls** - Do all steps contribute to a significant change in the final decision (or is it just rubber-stamping)? Is the output of this process effectively used by the receiver, and can we reduce validation levels down to the 4-eyes principle?

39. This process produces an output. Is the output of this process effectively used by those receiving it?

☐ Yes ☐ No

40. Do all the steps defined in this process contribute to a significant change in the final decision or the final outcome? (e.g. In a 6-step approval process, do steps 3 through 6 ever actually result in a 'No,' or are they just rubber-stamping?)

☐ Yes ☐ No, steps X to Y can be removed

41. Is there potential to reduce the levels of validation or controls in this process (i.e. validation/controls fit for purpose – NB the minimum level of validation is the 4-eyes principle)?

☐ Yes ☐ No

- **Criterion 13. Risk-Based Management & Automation** - Can this process be simplified through a risk-based approach? If it is still more manual than automated, is it because of IT limitations or because it genuinely requires human judgement? What is the disruption for stakeholders if it is poorly performed?

42. Can this process be simplified by applying a risk-based approach?

☐ Yes ☐ No

43. If this process is manual, which of the following best describes why this process relies on manual work and what is its level of automation:

- ☐ Fully manual: It requires strict human judgement and cannot be automated
- ☐ Hybrid: IT/AI systems are used, but a human must actively review, edit and validate the final outcome
- ☐ IT bottleneck: no IT system is configured for the workflow or the IT system is outdated
- ☐ Legacy: the process is manual out of historic routine
- ☐ Not applicable: process is already automated

44. Is there potential for implementing new methods or technologies to decrease input and improve outputs?

☐ Highly feasible ☐ Feasible with effort ☐ Difficult ☐ Not feasible

45. What would happen if you stopped this process? ('Scream test')

☐ Nothing ☐ Small disruption ☐ Medium disruption ☐ Significant disruption

46. If this process was deprioritised or discontinued, how significant would the impact be internally and on key external stakeholders (e.g. citizens, businesses, Member States authorities, etc.)?

☐ Significant external impact ☐ Mixed external and internal impact ☐ Primarily internal impact ☐ Limited impact

Final decision end Level 4 (chose one option only)

- ☐ **Option A: STOP IT** – action: remove step -> stop here
- ☐ **Option B: TRANSFER IT** – action: merge or consolidate with equivalent step in another DG -> stop here
- ☐ **Option C IMPROVE IT** – action: streamline -> remove layers, apply risk-based approach or automate -> action and close
- ☐ **Option D: KEEP IT AS IT IS** – action: change nothing -> stop here

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Executive summary Unlocking resources

Problem statement

The Commission operates in an environment of **growing geopolitical uncertainty, rapid change and heightened unpredictability**, with no sign of these trends abating. Many of Europe's future challenges are likely to require some level of **European cooperation** and support from the European Commission, including new tasks to deal with acute crises. **The Commission's workload is therefore likely to continue to increase and to require continuous adaptation.**

While the **next multiannual financial framework proposal** introduces greater flexibility for financial resource management, **human resources remain a critical bottleneck**. The Commission must improve its ability to allocate staff in a flexible, transparent, respectful and agile way so that it can both **act with speed in crises and adapt to changing political priorities** with the limited resources available.

Several barriers hinder this agility and are described below.

1. **Mismatch between priorities and human resources.** Political priorities are often pursued without a corresponding assessment of staffing needs. Directorates-General are left to absorb new demands with static or shrinking teams, forcing trade-offs that risk diluting impact or compromising staff well-being.
2. **Fragmented insights into staffing supply and demand.** The Commission lacks a **real-time, integrated view** of its workforce: where skills are located, how workload is distributed and where there are gaps or underused capacity, both now and in the future. Existing data are siloed, limiting strategic decision-making.
3. **Legacy-driven allocations.** Staffing levels in Directorates-General often reflect **past priorities** rather than current or future needs, effectively locking resources into legacy structures.
4. **Structural rigidity.** Staff typically remain under the **'ownership' of their Directorate-General**, reinforcing silos and limiting mobility. This stifles cross-department collaboration and makes rapid redeployment more difficult.

The **accelerating pace of geopolitical and technological change** demands a shift: from **reactive, short-term staffing fixes** to **proactive, strategic workforce planning**. The Commission must build a system that **anticipates future demands**, aligns resources with priorities in real time and fosters a culture of agility and flexibility without waiting for crises to force action.

DG staff allocation trends

Staff allocation in the various DGs has remained remarkably unchanged. Over the last 10 years, **five services have consistently ranked among the largest**: INTPA/DEVCO, JRC, DGT, HR and OIB.

On 1 January 2026, 9 991 staff members were allocated to these 'big five', representing roughly 30% of all staff (see [Figure 1](#) for a detailed overview). This is **remarkably close to the share allocated to the 'big five' in 2016**, when they accounted for 31% of all staff. This stability has been mirrored in the overall number of Commission staff, which stood at 33 071 in 2026 compared with 32 966 in 2016.

Over the years, DGs working on emerging political priorities have only received incremental increases in staff. It is therefore clear that the current incremental approach to staff allocation is no longer fit for purpose and runs the risk of significantly hindering the Commission in delivering its priorities.

Source: [HR Key figures](#) – DG HR.A1

Recommendations

1. Conduct a strategic resource reset

The upcoming multiannual financial framework is likely to bring significant **structural changes**. This creates the opportunity for a **one-off course correction** in the form of a strategic reset, with roles reallocated on the basis of future priorities rather than past precedents. This will help put in place a more **flexible and responsive system for allocating staff** and ensure that staffing is better aligned with the Commission's evolving needs.

2. Create flexible structures for rapid redeployment

The Commission currently lacks mechanisms to **mobilise staff quickly** for emerging priorities or crises. Drawing on best practices from national administrations, we propose creating a **central pool of staff** for cross-cutting or time-bound priorities and a **rapid response team** for immediate deployment in crisis situations. These structures will ensure the Commission can **act swiftly** without overburdening individual Directorates-General or relying on ad hoc solutions.

3. Develop a comprehensive workforce strategy at central level

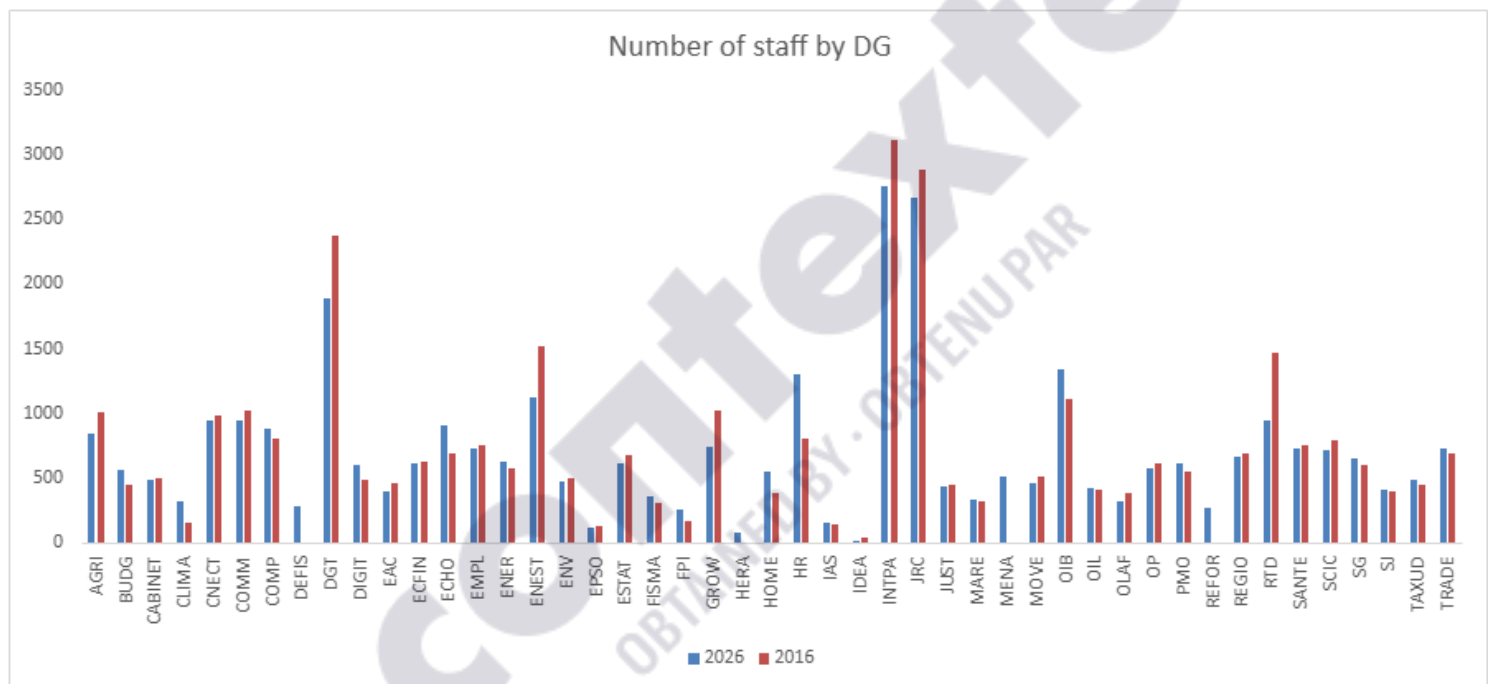
The Commission requires a **real-time, skills-based overview** of its workforce to **strategically align recruitment, training and internal mobility** with political priorities. This would enable us to **proactively reduce gaps in capability**, support targeted upskilling and **deploy resources flexibly** to meet evolving needs, either through redeployment, task forces, a central pool or other mechanisms.

4. Translate priorities into forward-looking workforce decisions

Every new or substantially reshaped political priority should trigger an **upfront assessment** of workload, staffing needs and reallocation options. This would ensure clarity on **what can realistically be delivered with existing resources**, what must be deprioritised or postponed, and how to protect staff well-being while maintaining focus on high-impact delivery.

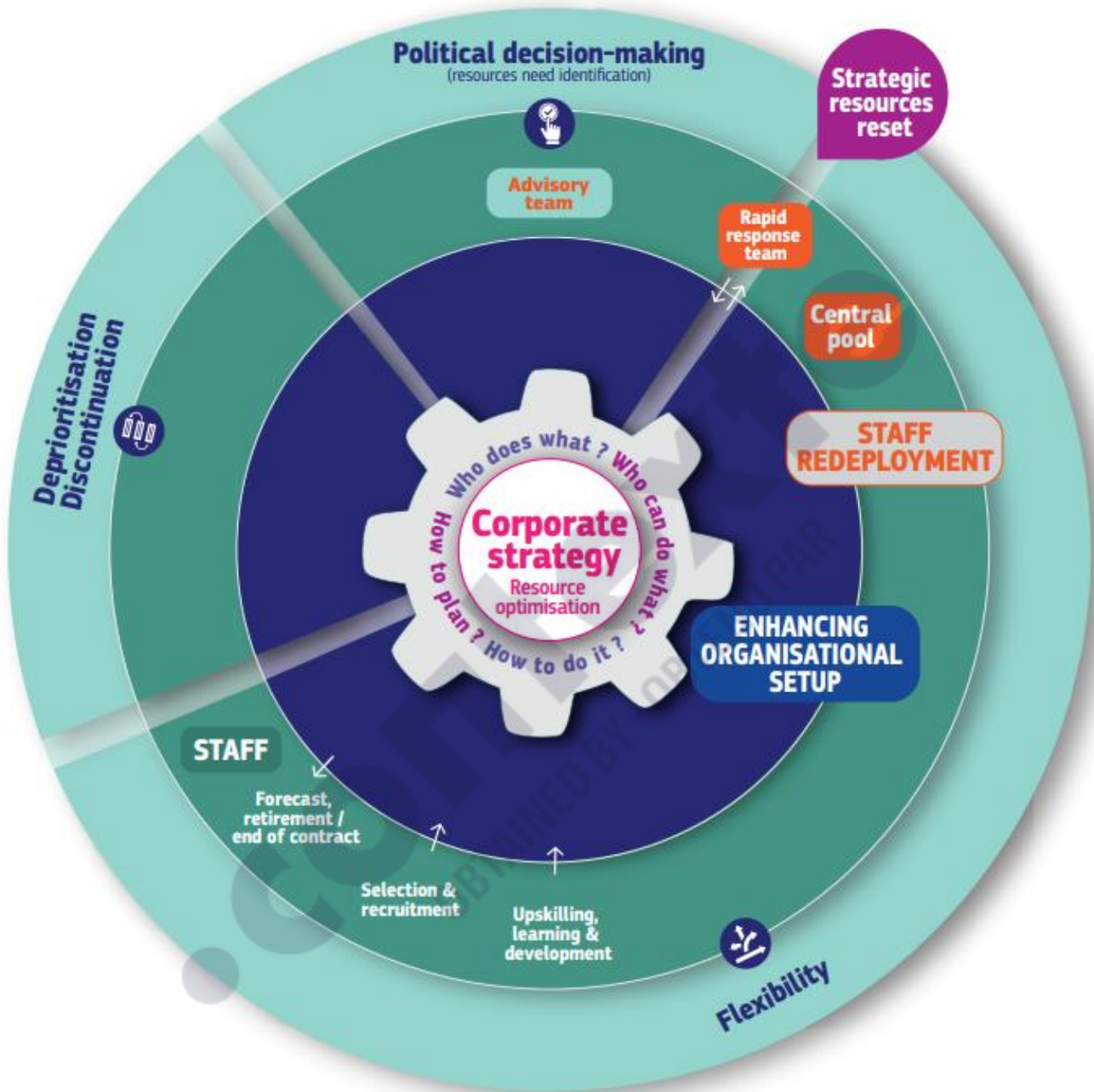
See **Figure 2** for a visual representation of these recommendations.

Figure 1 – number of staff per Directorate-General in the European Commission (2026 and 2016)



Source: DG HR.A5

Figure 2 – a visual representation of the recommendations



Source: Workstream Unlocking Resources (V. Rolland, S. Inglese, J. Sueters)

Recommendations on unlocking resources

Recommendation 1: conduct a strategic resource reset and reallocate at least 15% of Commission staff

Problem statement

Current staff numbers in Directorates-General (DGs) tend to reflect the political priorities of the past, rather than current or expected challenges. Staff allocation usually relies on incremental annual adjustments of around 1% and applies to posts that become vacant through natural turnover. From a wider perspective, these adjustments remain largely operational and often seem detached from major strategic decisions taken at political level.

The annual allocation process is well known to DGs, which often deploy different bidding strategies to achieve their individual goals. At the same time, oversight capacity at central level remains limited by the absence of adequate workforce analytics (see [recommendation 3](#)). As a result, the resource legacy of the past 'locks in' resources, leading to understaffing in areas that are essential for the current strategic needs and limiting the Commission's capacity to redeploy staff.

The Commission is facing strategic shifts in EU policies and an immediate need to prepare for the next multiannual financial framework (MFF). The MFF will require significant structural changes following a radical overhaul of budget implementation. Therefore, the current situation creates a unique opportunity for the Commission to become more strategic in allocating its staff.

Proposed solution

The Commission should set an ambitious target for a one-off internal redeployment of staff across departments. This should be carried out alongside the possible restructuring of DGs in preparation for the next MFF, or, at the latest, by the end of the current Commission's mandate. This would imply a one-off reset of DG allocation quotas.

It is clear that our organisation, with its legacy structures and more than 33 000 staff organised within a complex organisational structure, cannot and should not be redesigned from scratch. This proposal's objective is to strike the right balance between maintaining stability on the one hand, and seizing the opportunity for change on the other.

Staff allocation numbers should be reassessed in line with the Commission's priorities, including those linked to preparing the next MFF. In practice, this means that some DGs would gain staff, others would lose staff, and some would remain stable as part of a fairer distribution of resources based on current and future needs. If the one-off reset is linked to a possible restructuring of Commission

DGs, this would provide a natural opportunity to reallocate staff according to priorities.

To achieve meaningful change, the expectation is that at least 15% of Commission staff, approximately 4 500 full-time equivalents (FTEs), would be redeployed across the whole organisation by the end of 2029 at the latest. This would allow for a genuine realignment of resources with priorities, without disrupting the core tasks of Commission departments.

This minimum benchmark recognises that certain areas of work cannot be deprioritised because they are linked to, for example, legal or other obligations. The one-off reset should therefore serve not only to meet immediate needs, but also to lay the foundation for a more dynamic allocation process in the future.

This process should identify a core allocation of staff responsible for meeting essential obligations and ensuring continuity in essential roles. DGs should at all times be able to rely on a stable core number of staff to fulfil these obligations effectively. At the same time, certain DGs should be able to benefit from an additional, flexible allocation of resources to respond to emerging needs and to support new priorities.

Implementation

A Strategic HR Support Team, composed of representatives of the central services, should be created to draw up a centralised redeployment proposal, taking into account parallel developments on the new MFF and the large-scale review follow-up. This team should work in close consultation with the DGs concerned.

This proposal will pave the way for it to be endorsed by the Corporate Management Board, followed by a Commission decision on a strategic reset of resources for the 2028-2034 MFF, to be adopted in 2027. The decision will set out the Commission's level of ambition (reallocation of 15% of staff or more) to be achieved at institutional level.

Conditions of success

Strategic clarity and alignment. Delivering a 15% or more internal staff deployment requires strong political sponsorship from the President of the Commission and Commissioner Serafin, as well as a clear explanation of the need for it: the strategic challenges facing the EU require a resource reset. This should be explained carefully to all stakeholders, especially staff, to secure their buy-in and commitment to implementation.

Operational clarity. The process must be transparent and clearly communicated from the start. Communication is required first at management level – DGs, Resource Directors and the HR community – and then to all staff. To ensure

credibility, all DGs must be considered for reallocation and must participate, without exception.

Operational capacity. The Commission needs to pool its best resources to support the process. It needs to form a core task force in early 2027 with a strong mandate to design, support and monitor the process, bringing together specialists in staff allocation, reorganisation, innovation and change management. The task force should seek staff from all central services and beyond, based on a call for expressions of interest.

Comprehensive approach. The strategic reset should include all DGs and require innovative solutions for FTEs financed from sources other than the administrative heading of the MFF. It will also have to address the Commission's presence in the Member States, including Luxembourg and JRC sites. Exempting any part of the organisation from the outset risks undermining the credibility of the process.

Recommendation 2: create flexible structures – a central pool of staff and a rapid response team

Problem statement

Staff typically remain under the 'ownership' of their DG, which reinforces silos and limits mobility across the organisation. This, in turn, stifles cross-cutting collaboration and reduces the Commission's ability to redeploy staff rapidly where they are most needed. Most importantly, the Commission currently lacks effective mechanisms to mobilise staff quickly and flexibly.

This challenge is particularly acute when it comes to new priorities for which a more dynamic allocation system is needed. The Commission also requires a more dynamic approach to respond to emerging crises so that unexpected events can be managed effectively and with sufficient staffing.

In a context of accelerating geopolitical and technological change, the Commission therefore needs, on a permanent basis, a group of generalist staff that can be rapidly redeployed to work on new priorities or respond to emerging crises. The future is likely to be characterised by greater uncertainty, making flexibility even more essential. The current methods for redeploying staff are unlikely to be sufficient and therefore need to change accordingly.

Proposed solution

It is time for the Commission to go beyond ad hoc task forces and cross-DG project teams and to structurally anchor agility and flexibility within its staff contingent. The Commission should build a system that anticipates future

demands, aligns resources with priorities in real time and fosters a culture of flexibility, without waiting for crises to force action. To this end, it is proposed to create a central pool of staff that can be rapidly redeployed in response to emerging priorities and needs.

Staff in this central pool would work on time-bound priorities and be placed at the disposal of the receiving DG. They would move from priority file to priority file, without having a fixed 'home' DG to which to return. This would help ensure that these staff remain continuously engaged and can be deployed where their contribution adds the greatest value.

Alongside this central pool, a rapid response team should be put in place. This team would be made up of staff with specific skills who remain in their original posts. They would continue their business-as-usual tasks but could be made available to another DG at short notice if a crisis emerges, whether on a part-time or full-time basis. This team could also be used to support units facing critical staffing gaps, including by providing subject-matter expertise or administrative and management support.

The improved workforce analytics proposed under **recommendation 3** would support the Commission in ensuring that the skills of the rapid response team members deployed, and of staff reallocated through the central pool closely match the needs of the priority area or crisis concerned.

Together, these arrangements would give the Commission a more agile and resilient staffing model: one that supports both shifting strategic priorities and sudden operational pressures, while reducing the need for ad hoc and disruptive redeployments.

Implementation

The central pool would form a flexible group of staff drawn from three main sources.

- As part of the strategic reset envisaged under **recommendation 1**, some of the colleagues redeployed through that process could be assigned to the central pool.
- Other staff could join on a voluntary basis through calls for expression of interest. This would enable the Commission to attract colleagues who are motivated by cross-cutting work, a variety of tasks and the opportunity to contribute to high-priority files across different policy areas.
- Some newly recruited staff, in particular generalists, could be assigned directly to the central pool from the outset. This would help make workforce

planning flexible from the beginning and create a pipeline of staff with experience of working across DGs and policy domains.

The rapid response team should be composed of staff with specific crisis-management experience and a proven track record in adapting quickly to new needs, filling critical gaps and supporting teams during periods of acute pressure. These people could be identified through calls for expression of interest.

For both the central pool and the rapid response team, a light selection process should be put in place to ensure that staff joining both structures have the right profile to move between DGs and work effectively on a variety of files. In particular, the process should identify colleagues with strong adaptability, sound judgement, and the ability to work in teams and become operational quickly in new settings.

Based on the input provided by the Strategic HR Support Team (see **recommendation 1**), the Corporate Management Board would decide on the allocation of staff from the central pool and the rapid response team to individual DGs. The Board would also set out the wider parameters for their use, whether in support of new priorities identified through the process described in **recommendation 4** or in response to emerging crises. At the same time, DG HR would be responsible for ensuring the smooth operational allocation of these staff members, including appropriate handovers and continuity of tasks.

Unlike staff in the central pool, staff in the rapid response team would remain in their original posts and be placed 'on call' for emerging crises. If called upon, they would be seconded to the DG concerned, either on a part-time or full-time basis depending on the nature and intensity of the crisis.

Particular attention should be paid during implementation to ensuring that staff are sufficiently incentivised to join these flexible structures. Therefore, the arrangements for appraisal, promotion, reporting lines and managerial oversight should be clearly set out before these flexible structures are created. This should include consideration of whether, in certain cases, service in the central pool or rapid response team could be recognised through faster career progression or other targeted incentives.

The success of this recommendation will depend not only on sound allocation mechanisms but also on trust, transparency and staff confidence in how the system operates. Clear rules, visible management support and fair recognition of contributions will be essential if the central pool and rapid response team are to become credible and effective ways to make the Commission workforce more flexible.

Recommendation 3: develop a comprehensive workforce strategy

Problem statement

In the Commission, workforce decisions on staffing needs at central level (annual resources allocation, learning & development, competition planning, etc.) are mainly based on input from individual DGs. In turn, these DGs rely on staffing needs forecasts prepared by their policy units. However, according to most DGs, they lack a methodology or adequate workforce analytics to help them assess their staffing needs. This means that DGs' inputs are largely driven by current and short-term needs. Foresight policies, if they exist at all, are not part of the assessment either. In addition, some Human Resources Correspondents teams do not have the right skills to carry out analytical work next to their daily HR management tasks.

At central level, the Commission also lacks reliable and comprehensive data on staff skills, expertise and workload. The workforce information recorded in Sysper is overly complex, subjective, underused and outdated. In addition, tools for automatic data extraction are insufficient. Workforce foresight, i.e. aligning workforce decisions with longer-term objectives, is underdeveloped. As a result, the Commission lacks an overall strategic approach that enables it to anticipate future developments, ensure the right workforce profiles are available and make effective use of those profiles. Overall, this reduces the quality and impact of workforce decisions made at central and local level.

Proposed solution

The Commission should draw up a methodology and develop tools to help understand in real time: (i) what skills and specific expertise are available in the organisation; and (ii) how this situation is likely to develop, in particular through retirements and departures. This work could build on ongoing efforts under the HR transformation programme, which aims to review, streamline and modernise HR processes, data sources and tools. This workstream's recommendations would provide an additional boost to developing a meaningful and fit-for-purpose data set on Commission jobs and staff, focusing on tasks and skills.

Furthermore, this would allow, on the basis of current and future policy priorities set at political level, to assess recruitment and training needs. It would also facilitate internal redeployment and setting up task forces or other mechanisms to deal with those priorities.

Such a comprehensive workforce strategy would create an ecosystem in which the main HR management decisions would complement each other, aiming to provide more agile and sound HR solutions. This would require, among other things, providing a methodology and tools to conduct workforce analysis and making sure that HR teams, both at central and DG level, are adequately staffed to do this work and are structured to manage staff effectively.

Implementation

Scope

This workforce strategy should provide the framework for taking decisions on staff allocation, selection and recruitment, redeployment, upskilling, and setting up flexible ways of working and organisational structures (such as matrixes, task forces and the rapid response team). In addition, it will be essential to link any training measures to the Commission's future needs, rather than leaving it to individuals to choose training on the basis of personal preferences. This requires that upskilling be linked to performance assessment and career development, with the acquisition of new skills and improved performance adequately supported and rewarded. This will also help ensure appropriate succession planning for the key jobs and roles in the institution.

The strategy would also equip DGs with a toolbox to support the preparation and implementation of their local HR delivery plans. This toolbox would be underpinned by structured data and information on workforce analytics, workforce foresight, human resources availability and workforce needs.

Design principles

A comprehensive workforce strategy needs to support delivering strategic objectives at corporate and local level.

- A meaningful strategy requires a clear identification of what policy priorities the institution is supposed to deliver on in the midterm and longer term. In particular, this will entail making clear which areas will no longer be considered priorities in the future.
- A clear understanding must be developed of available staff (workforce supply), expected staff changes and departures, and, finally, the remaining needs for staff (workforce demand), in terms of profiles and skills needs.
- HR policy measures need to be designed. The main output will be the ability of the Commission to understand its workforce and manage it in an agile manner in a short- and longer-term perspective, through strategic workforce planning fed by dedicated tools and policies.

Recommendation 4: translate priorities into forward-looking workforce decisions

The Commission should ensure that new or substantially reshaped political priorities are systematically accompanied by an upfront assessment prepared by the DG. It should set out the expected workload, staffing needs and options for reallocating resources, using a simple common dashboard and with central support. The assessment should clearly state both how the additional workload will be covered and what will be done less, later or differently, where possible, with stable staff resources. It will enable DGs to plan and organise work so that they deliver on the key priorities while ensuring staff well-being.

Problem statement

Today, the Commission has no systematic process for translating new or evolving political priorities into forward-looking workforce decisions. Political priorities are often prepared and decided without a structured assessment of HR needs beforehand, and it is then largely left to DGs to work out how they will deliver with the resources they have and with only limited staff increases at best.

In a context of overall stable staffing levels and in the absence to date of a systematic approach to deprioritisation, new tasks tend to be added on top of existing activities. As a result, a significant share of staff continues working on less critical tasks, while pressure on staff increases with every new task added. Workforce analytics and tools remain underdeveloped, and the current linear and limited contribution model does not provide an effective, priority-driven and dynamic framework for reallocating resources across DGs in an agile way.

Proposed solution

Whenever a major initiative is to be developed, the lead DG should: (i) set out the workforce needs and provide a factual assessment of the workload implications of the new priority; (ii) estimate the number of FTEs required (including, where possible, the main profile types); and (iii) propose how to manage the new workload within the DG.

Where immediate resources are needed to develop the major initiative, the request may be submitted to the Corporate Management Board for a swift decision on possible reinforcement. These assessments should be prepared as early as possible in the process, for example, when new priorities are announced in the State of the Union or at the start of a Commission mandate.

In addition, when any major policy initiative is submitted to the College, the lead DG should include an assessment or updated assessment of the resource implications. Once a major policy initiative is adopted, DGs should be responsible for updating the assessment on the basis of the results of the political negotiations, after which the Corporate Management Board should decide on the resources to be allocated. Resource implications should also be addressed in the Interinstitutional Relations Group (GRI).

This recommendation covers new or substantially reshaped political priorities that are expected to have a significant impact on workload, regardless of whether they come with dedicated budget lines. It should apply to a limited number of broad priority types, including: (i) policy or legislative priorities without significant budgetary implications; (ii) programme or implementation priorities with budgetary implications; and (iii) crisis-related priorities.

Implementation

For requests for new or substantially reshaped political priorities, a standard dashboard could be developed. It would be based on a small number of workload indicators to ensure that estimations are practical and comparable. The dashboard would not replace but complement internal workforce planning inside DGs, formal budgetary procedures or rules on posts. Rather, it would inform those processes by making workload, staffing implications and deprioritisation choices more visible, structured and comparable.

The assessment should set out the possible options for covering the required FTEs. As a matter of principle, the assessment should consider solutions that can be mobilised internally within the DG. These internal options may include: (i) upskilling or reskilling (if time allows); (ii) process simplification and changes in working methods; (iii) internal redeployment within the DG; and (iv) deprioritisation of other activities.

Additionally, the lead DG may also indicate its wish to use corporate solutions, such as time-bound support from the central staff pool (see **recommendation 2**) and additional staff, where duly justified. The dashboard will serve first as a factual basis for assessing how the priority could be financed and organised before a proposal is submitted for political decision.

Once validated by the DG and the relevant Cabinet(s), the completed dashboard and DG proposal should be sent to the Strategic HR Support Team at central level. The team would carry out a quality check of the proposal, challenge the assumptions where necessary, and advise on the extent to which temporary resources could be allocated from the central pool. The Strategic HR Support Team will need to justify its decisions and the options considered, including the reasons for allocating or not allocating temporary resources. Where deprioritisation is proposed, the consequences for other Commission departments should be explained and justified.

Executive summary Offices and Agencies

Problem statement

Offices, Executive agencies (EAs) and Decentralised agencies (DAs) are entrusted with dedicated tasks. DAs and EAs are legal entities separated from the Commission. Our analysis concluded they all remain pertinent formats for the type of tasks they perform.

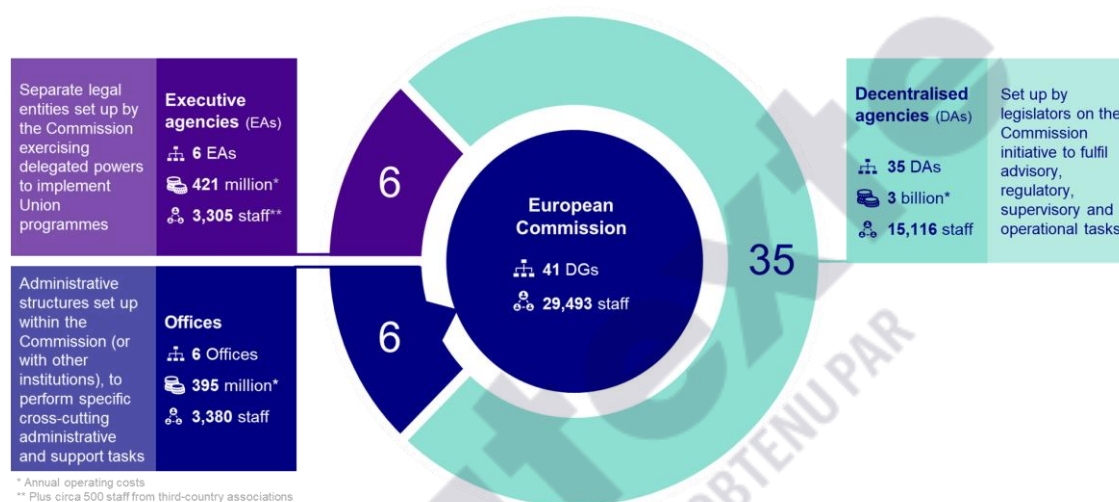


Figure 1: illustration of Offices and Agencies landscape – 2025 data

However, when analysing their functioning against the principles of efficiency, coherence, agility and effectiveness, we have identified challenges mainly around governance and staffing issues. In addition, we noted that the relevance of the tasks entrusted needs to be regularly assessed and that the overall coherence of good policy making requires an effective access to and exchange of knowledge and expertise.

In the context of the next Multiannual Financial Framework (MFF) period starting in 2028, the workstream has sought to further increase the cost-efficiency and effectiveness of these models. For this exercise, targeted consultations were undertaken and various inputs received and reflected in our analysis, notably from the Central Staff Committee and the EU Agencies Network (EUAN).

Recommendations

Offices



Figure 2: illustration of the 3 recommendations for Offices

First, the Commission needs to enhance the model of Offices by addressing decision-making issues concerning the scope and definition of tasks, governance and staffing challenges. Second, to allow the Commission to focus more on core policy tasks, the scope of existing Offices could be expanded and new Offices created to perform cross-cutting administrative and support tasks and beyond, while excluding policy development, coordination, interinstitutional or international negotiations and institutional legal advice. Third, to seek further cost-efficiency at a higher level, bundled services performed by Offices could be offered to other EU institutions as packages based on a streamlined Service Level Agreement (SLA) approach.

Executive Agencies

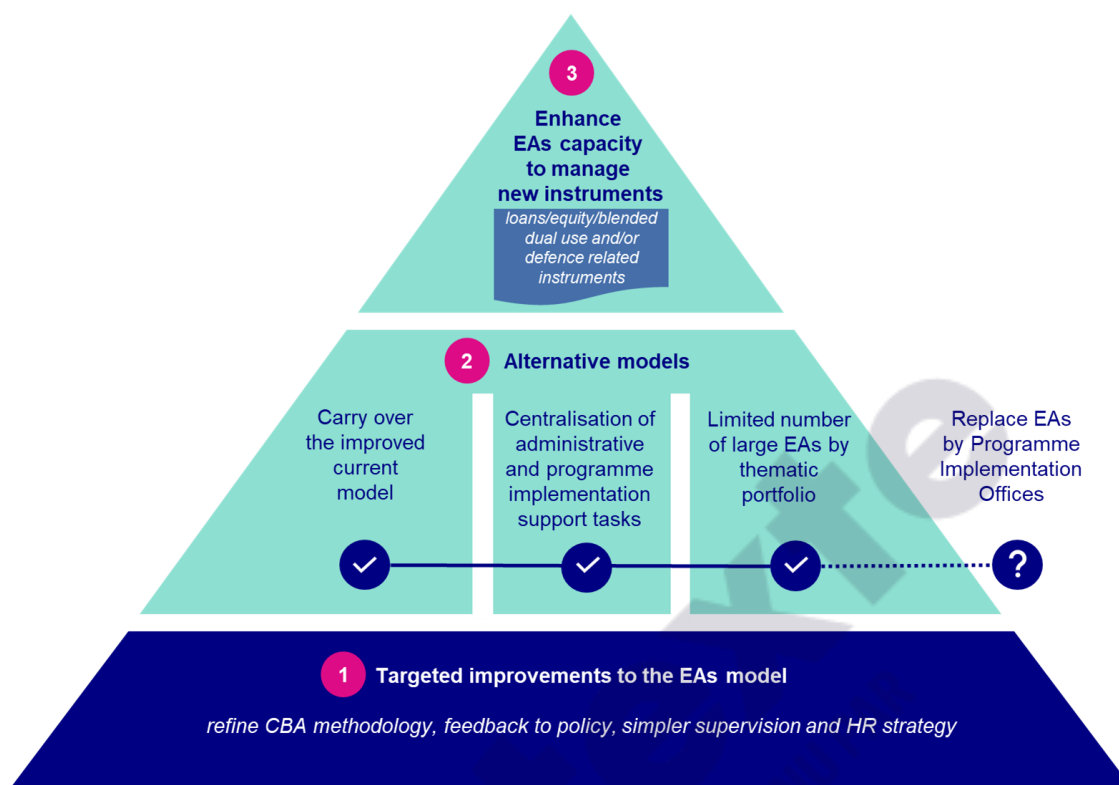


Figure 3: illustration of the 3 recommendations for Executive Agencies (EAs)

The current model of Executive Agencies can be improved to increase efficiency, agility, and inter-agency cooperation. It would require targeted adjustments to address governance and staffing challenges. In our analysis, the current improved model could be carried over for the next MFF period. In addition, we have analysed – in a much more limited way than the ongoing cost benefit analysis will – further alternative organisational models building on improvements: centralising administrative and programme implementation support tasks and distributing them in different Executive Agencies; creating a limited number of large Executive Agencies clustered by thematic portfolios; replacing them with Programme Implementation Offices – a model that would face significant legal, budgetary and practical obstacles in its set-up. Finally, we address their capacities to implement in the next MFF dual use and defence spending and new instruments beyond grants (procurement, loans, etc).

Decentralised Agencies

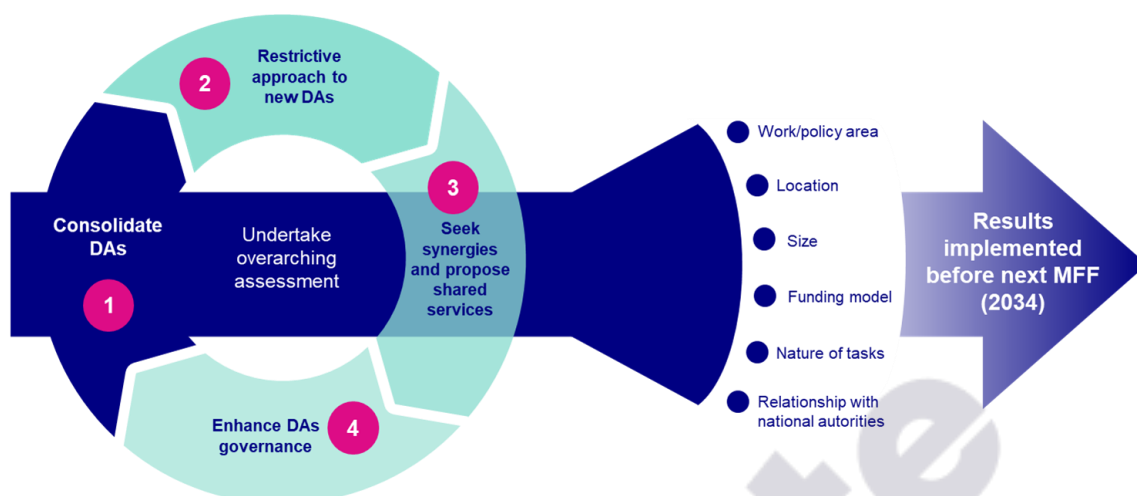


Figure 4: illustration of the 4 recommendations for Decentralised Agencies (DAs)

Given the steady increase of their number, cost and staffing and the small size of many, the landscape of Decentralised Agencies should be consolidated through partial or full mergers and, in appropriate cases, discontinuation. This recommendation would mostly be implemented throughout the next MFF, given the time needed for preparing and adopting legislative amendments. Unless an imperative need can be established, there should be a moratorium on the creation of new Decentralised Agencies. Pooling support and administrative services amongst Decentralised Agencies should be introduced to enhance synergies and cost-efficiency. Finally, as part of wider initiatives to improve governance, action should be taken to enhance the administrative oversight of the Decentralised Agencies, including by the Commission.

Recommendations on Offices

Improve the administrative model of Offices for service delivery with a view to expanding it to new tasks and to interinstitutional service delivery.

Offices are entities within the Commission performing specialised, cross-cutting support and administrative tasks that the institution wants to keep under direct control. The creation of Offices is driven by the need to increase efficiency and specialisation, achieve savings and for the Directorates-General (DGs) to focus on their core tasks and activities.

Given the interinstitutional, legislative, and historical particularities of EPSO, OP and OLAF, the workstream decided to focus its analysis on the Commission offices OIB, OIL and PMO.

The first recommendation aims at fixing the governance and staff challenges identified in consultations and in our analyses. Addressing these challenges is a prerequisite to improve the effectiveness, efficiency, agility and attractiveness of Offices as service delivery model. The second recommendation aims at expanding the Office model in three ways: expansion of the tasks of the existing administrative Offices (PMO, OIB and OIL), and/or creation of new Offices to cover more cross-cutting support tasks and/ or creation of new Offices beyond the traditional cross-cutting administrative and support tasks. The third recommendation suggests that Offices could also deliver more services to other EU institutions and Decentralised Agencies (DAs) based on a streamlined, simplified and proportionally compensated Service Level agreements (SLA).

Recommendation 1: Targeted improvements to the current model

Problem statement

Governance challenges hampering full effectiveness of Offices

Important decisions on the tasks and responsibilities of existing Offices are today taken by actors beyond the established governing body (Management Committee). This raises the double question of the effectiveness of the Offices' governance arrangements and of the decision-making mechanism related to their delivery model of services. The roles and responsibilities of the Directorate-General (DG) of attachment towards the Offices are unclear, leading to potential gaps in the decision-making and information flow.

Staffing challenges impacting Offices' efficiency, agility and attractiveness

The high staff/manager ratio leads to difficult management situations. The specialised profiles of staff constrain mobility and adaptability to perform new tasks and thus limit the agility of Offices. The set-up of separate annual establishment plans for Offices also contributes to a lack of agility.

Proposed solution

Clarify and strengthen the role of the DG of attachment: it would be explicitly responsible for the definition of policies and the supervision or 'monitoring' that these policies are implemented; it would validate and launch any ISC and oral or written procedure concerning the Office; it would have a right to request and obtain information (to ensure feedback to policy, facilitate coordination with the Cabinet, etc.); it would coordinate and bring to the attention of the Corporate Management Board (CMB) issues of corporate relevance; it would coordinate and bring to the attention of the Cabinet any points with political or policy implications (currently set out only in Working Methods); it would continue to chair the Management Committee (even in its revised format – see below) and provide its secretariat; it would ensure consistency in its relations with all Offices under its supervision; it would play a pivotal role in the decision-making procedure for the delivery model of the services (notably internalisation /externalisation given the impact of such decisions on staff, budget, business continuity, functioning of the institution, etc.). The DG of attachment and the Office would coordinate any issue of relevance for the policies or issues of political sensitivity and hold regular meetings.

Adapt the role and composition of the current Management Committee (MC) to allocate certain tasks to the DG of attachment together with usual corporate services and processes. The tasks of the MC would be changed into advisory. MC meetings (twice a year) would be used to exchange information, give advice and customer satisfaction feedback. For simplification purposes, certain reporting requirements would be streamlined. The MC should be composed of DG HR as DG of attachment, the Office Director, staff representatives and client representatives (DGs and when relevant other institutions). Its name could be changed into Advisory Committee.

Define the decision-making procedure for the delivery model of the services with a strong role for the DG of attachment, when relevant after consultation of the CMB, and based on a cost-benefit analysis (CBA) measuring notably the cost of outsourcing certain tasks or services instead of direct delivery by the Office.

Create a specific HR strategy for staff in Offices to address specialised recruitment processes, size of the units and departments, ratio officials/non-officials and managers/staff, management levels, career development, other incentives, etc.

Implementation

The founding Commission decisions establishing the Offices would need to be revised. To prepare for such a revision, DG HR as DG of attachment of OIB, OIL and PMO should prepare an amendment with SG, DG BUDG and SJ and submit it to interservice consultation. It will be particularly important to clarify the delimitation between supervisory powers of the DG of attachment and the powers of the Director as authorising officer by delegation.

In addition, an **amendment to the Financial Regulation** would address the substantial change of role of the MC and would give a mandate for the DG of attachment to authorise / decide on the delivery model of services.

A dedicated **HR strategy would be developed** by DG HR, taking into account the similar challenges for careers of Contractual Agents (CA) type 3a staff in Executive Agencies (EAs), with due consideration to facilitating mobility from/to EAs (through the inter-agency mobility market).

Recommendation 2: Create new Offices

Problem statement

Our analysis has shown that Offices are cost-efficient, agile and effective as a model of service delivery. Provided that their current set-up is improved (recommendation 1), we would propose to create new ones.

The objectives pursued would be to increase the quality of service and to better respond to customers' needs (Commission departments, staff, others). The Commission would free up resources for its DGs and gain increased efficiency from the Offices' staff structure (e.g. use of more contract staff with contracts of unlimited duration) and savings, thanks to economies of scale from an improved horizontal/cross-DG or inter-institutional approach (see recommendation 3).

Proposed solution

Under the three scenarios below, it is proposed to change the model for the performance of certain tasks that are currently carried out in the Commission. This would allow the Commission to focus more on core policy tasks while ensuring quality, efficiency, and scaling in service delivery in non-core policy domains.

Scenario 1: Expand tasks of existing administrative Offices

The Commission would maintain the current Office landscape and expand the scope of PMO, OIB and OIL to new administrative domains (such as entry into service management, conference centres, etc).

Scenario 2: Create new Offices to cover specific cross-cutting support tasks

Within the current legal framework, the use of new Offices would be expanded to other cross-cutting administrative and support tasks such as centralised and shared Offices serving clusters of DGs. Potential tasks to be considered could be for instance a pool of secretarial support, communication support, procurement support, financial management, support for ex-post controls of payments, support to ex-post control of underlying transactions not covered by the delegation of programme implementation to EAs, etc.

Scenario 3: Create new Offices to cover tasks beyond the traditional administrative and cross-cutting support tasks

It would broaden the use of Offices to cover tasks beyond the traditional administrative and cross-cutting support tasks. These tasks would not be linked to the Commission's role as guardian of the Treaties or to its right of initiative, and would exclude policy development and coordination, interinstitutional or international negotiation and institutional legal advice.

Potential areas to be considered and assessed in line with the Service Model Workstream recommendations: IT support (digital workspace, infrastructure, cybersecurity), translation, interpretation, etc.

Illustration for scenarios 2 and 3: examples of DGs that have partially or entirely administrative support tasks

	Officials	Temp. Agents	Contract Agents	Others (local staff, Special Advisers, staff under national law)	Total	% whole Commission staff
DGT	1 574	162	172	-	1 908	5.8%
SCIC	577	90	73	-	740	2.2%
DIGIT	370	108	127	-	605	1.8%
HR	796	249	242	10	1 297	3.9%

Some of these departments also have policy responsibilities which must remain in a DG. Therefore, only parts of those DGs could be transformed into an Office. Depending on their size, the remaining activities could either remain in the DG or be assigned to another one.

Implementation

A **check list** would support the decision on the expansion of tasks of existing Offices and for the creation of new ones. This list would seek to help defining the tasks, their relevance for interinstitutional delivery, and identify the potential risks of moving tasks from Commission DGs to Offices. Considerations on the governance of the new Offices, their size and staff profiles will also have to be looked at. Finally, a **CBA** would need to be launched, based on criteria ensuring quality and efficiency of service delivery, cost/benefit ratio, economic and financial benefits, risk of loss of know-how for client DGs and DG of attachment and mitigation measures.

The Commission would need to **develop a typology of Offices** for the implementation of different tasks (cross-cutting administrative and support tasks, others), but also to cater for different cases (administrative offices, shared service / resource offices, interinstitutional / geographically dispersed services offices).

Contrary to scenarios 1 and 2, certain areas under scenario 3 might require **changing the Financial Regulation** (Art. 2 number 27) and the **Commission Rules of Procedure** (Art. 45) to include tasks which currently do not qualify as 'cross-cutting administrative and support tasks'.

Once a decision is taken to create a new Office or to expand the tasks of an existing Office, **key steps would need to be followed**: design of the Office, its function, mandate and governance, define staffing needs, compliance checks with financial and staff rules, draft establishment decision, etc.

In addition, to prepare an **'orderly' transition**, the following steps should be considered:

- Based on the CBA (from 6 to 12 months) estimate the time for transition;
- Consultation of the Staff Regulations Committee according to Article 3a, letter c of the Conditions of Employment of Other Servants (CEOS);
- Adaptions of the legal and budgetary frameworks (from 6 to 18 months);
- Forecasted needs of staff (taking into consideration profiles and technological developments);
- Define exact assignments that can be carried out by CAs and Officials
- Create new structure in an Office and transfer staff;

- Follow closely 'liberated official posts' to be replaced by CAs during the transition period and up to a maximum of 75%.

The decision-making process to create new Offices would take at least several months, while the setting and the transition is expected to take from 2 to 3 years.

Recommendation 3: Interinstitutional service delivery

All three scenarios described under recommendation 2 could be open to interinstitutional service delivery and to DAs.

Problem statement

Setting up interinstitutional Offices can be a lengthy and complex process, often leading to heavy interinstitutional decision-making structures. Nevertheless, cost-efficiency calls for a stronger pooling of services among institutions, e.g. in translation, where all institutions employ a high number of staff (e.g. the European Parliament alone employs ca 1,200 FTE for this service and the European Commission ca 1,900 FTE).

Proposed solution

The services offered to other EU institutions and DAs would be delivered by one institution through a streamlined and simplified SLA, offering proportionate compensation for the real cost (including management). In addition, an agile and effective governance system would apply where customer feedback is given in a revamped MC/advisory committee.

The Commission would offer more services. This could include translation, IT services, procurement support, management of buildings in all locations, security/safety (including building security, health and safety for staff, cybersecurity), etc.

Implementation

DG HR, DG BUDG, SJ and the Offices would **streamline and simplify the SLA approach** and set proportionate and reliable billing models for the total cost (including also management and overhead costs). The functional pooling of SLAs should be favoured. The Commission should propose to other institutions and DAs a full list of service packages, instead of today's *à la carte* approach.

Use case: Scale EC printing services to other EU institutions in Brussels

The EC Printshop (OIB) serves Commission services with 32,000 Commission staff, with an annual production of 14.5 million A4 pages. It operates as a centralised model from a single Brussels-based facility (DAV building), supported by a shuttle delivery system and partial externalisation (50% of large-format printing via Créaset, costing €350K/year; two Bluebridge contractors at ± €140K/year).

Key figures and strengths EC Printshop (OIB):

- Current €3.2 million annual budget: 17 staff (mainly CA FGI) €1.5M; rent/print costs: €550K; DAV building lease: €1M (shared with Mail service).
- Scalable infrastructure (40 machines, 90% owned; €75K/year maintenance).
- Cost efficiency (average €0.03 per A4 page).
- Expertise: from machine operators, confidential printing for Presidency/Cabinets, planning to optional graphic design, signage and transportation.
- Rapid turnaround (1.5–2 days standard; 0.5 day for urgent requests).
- Existing synergies (5% of print jobs for other EU institutions).

Two scenarios:

Scenario 1: Centralised printshop model (proposed)

OIB “EC Printshop” as the primary provider for other EU institutions (±12,000 additional users). The scenario reduces duplication (staff, equipment, infrastructure) and would make the service more modern, attractive, agile and cost-efficient.

Benefits:

- 30–45% cost savings (±€1M/year) via economies of scale over the long-term, after its initial transitional and phase out costs.
- Extended service hours (e.g. shift-based workload balancing).
- Current and future OIB logistics hub (2032+) could host centralised services, freeing space in headquarter buildings in the centre of Brussels.

Requirements:

- EU institutional buy-in.
- Efficient cost model and fair compensation of costs.
- Shared digital platform (e.g. MyOIBprint/GamSYS).
- Mutual security protocols for confidential materials.
- Pilot testing – phased approach (building on the 2020 Publication Office study).

Scenario 2: Distributed printshop network (alternative, intermediate step)

Specialised collaboration between printshops (e.g. one institution handles large formats, another offset printing, etc.).

Advantages:

- Less disruptive than full centralisation.
- Flexible, leveraging existing synergies.
- Could serve as a transitional step toward Scenario 1.

Recommendation: Conduct a detailed feasibility study to assess costs (transition and charge back model), staffing, and institutional buy-in before implementation.

Recommendations on Executive Agencies

Design different options for more efficient Executive Agencies to deliver programme implementation fit for the next MFF.

The separation of policy from programme implementation implies that Executive agencies (EAs) operate with specialisation, economies of scale and focus on performance against measurable objectives.

Twenty years after the first delegations of programme implementation to EAs, the model has proven its relevance, both in terms of cost-efficiency and effectiveness compared to in-house implementation. The retrospective CBA for the period April 2021 – March 2024 estimated actual savings of €702 million compared to the in-house scenario. The ratio between the administrative and the operational budget ranges around 3%, demonstrating efficient resource utilisation.

The first recommendation aims at improving the current functioning of the EAs. Four alternative models for the next MFF are explored under the second recommendation. The last recommendation addresses the novelties of programme implementation under the next MFF: increased use of new instruments beyond grants such as procurements or loans, dual use and defence spending.

ERCEA has a specific governance mechanism involving the European Research Council that calls for a distinct treatment.

Recommendation 4: Targeted improvements to the current model

It is recommended to increase the capacity of EAs by enhancing efficiency gains, improving agility and setting more effective governance and supervision mechanisms.

Problem statement

A rigid delegation process

EAs are mandated to implement a programme portfolio via their establishment/delegation acts covering a full MFF period. If the Commission needs to pivot priorities, there is little flexibility to adjust rapidly delegations and transfer programmes and staff (given that an ex-ante CBA is required).

A cumbersome supervision system

While the good track record on performance for delegated tasks has reduced the need for closer supervision, the architecture of separate legal entities makes

supervision more cumbersome and prone to duplications (there are as many supervisory mechanisms as there are EAs).

A loss of expertise for project management and policy relevant feedback from project results for the Commission

Delegation of programme implementation to EAs can lead to a loss of institutional memory for the Commission. This situation also poses difficulties to EAs. Feedback to Policy (F2P) is a key success factor for the effectiveness of the delegation, aiming at substituting the DGs loss of direct access to the actual implementation of the projects. Being a key element for the drafting of work programmes, DGs have raised their expectations towards more forward-looking and in-depth analysis. However, for the current MFF period, the delegation addresses F2P as a marginal add-on task (3% of resources).

A lack of attractiveness for Commission and non-Commission staff

Even if EAs offer career opportunities for Commission staff, such as access to management positions, many Commission officials seconded to EAs have a perception of disconnect and report difficulties to return in DGs. These factors reduce the attractiveness of EAs. EAs offer the possibility of indefinite contracts for external job applicants and Commission CA and Temporary Agents (TA). However, there is a perception of reduced career opportunities for this category of staff, exacerbated by the difficulty to move from one EA to another (due to the legal set-up: one EA, one legal entity).

Proposed solution

Increase agility of EAs throughout the MFF period by: refining the CBA methodology to calculate resources for delegated tasks, to be replicated for more frequent updates of resource allocations (possibly in line with programming cycle), exploring ways for moving staff across EAs without competitive selection procedures and more flexible resources reallocations by EAs' Directors.

Develop a simpler supervision structure through strengthened ties between seconded officials and their DG/Directorate, strengthened supervision and benchmark of administrative processes and harmonised, shortened and automated reporting. Seconded staff could be better used as a primary channel for oversight and for exchanging knowledge and expertise between Commission and EAs.

Build capacity at EAs and Commission level to improve F2P by establishing a corporate strategy covering all programmes with delegated implementation.

Increase attractiveness for Commission seconded staff by involving them in the management coordination structures of their parent DGs, facilitating their inter-agency mobility and their return to DGs.

Increase attractiveness for non-Commission staff by exploring internal selections for CA3a to access the TA2f career, by increasing access for TA2f to junior management positions and by increasing the share of TA profiles within budgetary limits. Explore ways for moving staff across EAs notably through the merging of the internal and inter-agency publication of vacancies. Explore the possibility to organise external/open competitions for profiles where EA experience is relevant for the EU institutions.

Implementation

DG BUDG would **refine the CBA methodology** using additional drivers such as timing and complexity of tasks resulting from annual call budgets, the variety of operations to be managed (grants, financial instruments, procurement, etc) and the required capacities to deliver on F2P activities. The refined method should be built on clear indicators that can be collected rapidly and would allow for more frequent updates of the calculations. The annual-growth scenarios by an agency (coupled with vacancies following staff resignations) will make such re-allocation possible. Where this would not suffice, staff movements across EAs without competitive selection procedures can be explored through Commission decisions re-delegating budget and staff (extended motorway procedure).

The Commission would **prepare and adopt a F2P strategy at corporate level**. Related resources needs for F2P are to be mentioned in the establishment and delegation instruments. IT systems for F2P analysis and data collection would be upgraded.

The Commission would prepare **a single chapter on supervision common to all MoUs** translating the delegation agreements into more practical working arrangements for each EA.

DG HR would develop **a specific HR policy** for Commission seconded officials and for EA staff (similar to the one developed for staff in Offices when relevant – see recommendation 1 on Offices). General Implementing Provisions to the CEOS would be changed to allow for merging of the internal and inter-agency publication of vacancies.

Recommendation 5: Four alternative models

(i) **Carry over the existing model with improvements** (see recommendation 1)

(ii) **Centralisation of programme implementation and administrative support tasks.** Building on the improvements described in recommendation 1, propose a distributed centralisation of programme implementation and administrative tasks across EAs as a way of resource-efficiency, easier administrative supervision and stronger inter-agency cooperation. It would tap into a potential for more economies of scale and savings.

Problem statement

Administrative support tasks: EAs are given large flexibility in relation to their operating costs. Considering the structure of their administrative budget (80% salaries, 15% costs of SLAs with Commission central services and Offices) additional savings, although limited, can be explored. Administrative support activities linked to logistics, document management, legal support, external communication support, IT support, HR support functions (e.g. organisation of joint selection procedures, eligibility checks, organisation of testing and medical visits, processing conflict of interest declarations, encoding in SYSPER) could be pooled together.

Programme implementation support tasks: EAs have developed specialised implementation support services that have a potential for scale:

- REA's Central Validation Service (currently 110 staff) provides participant validations as a corporate service to other EAs, DGs, other EU institutions and bodies that implement the EU budget through direct management.
- REA contracts and pays all expert evaluators for Horizon Europe except for the ERC (75 staff).
- HaDEA has developed in-depth knowledge on managing operational procurement operations and has set-up dedicated organisational structures that qualify as a centre of excellence on procurement management.

Proposed solution

Increase inter-agency coordination: each EA would host one or more programme implementation and/or administrative support task(s). It would become a centre of expertise in a given area and would offer its services to all other EAs, and possibly to new clients.

While various options can be explored, in the preferred one, each EA would host one or more centralised service packages that would be proportional to its size.

Where such a balance cannot be achieved, options for proportional contribution to the cost of operating the centralised tasks should be explored.

Extend the current centralisation of programme implementation support tasks to new services (e.g. part of the activities operated by the Common Implementation Centre in DG RTD: ex post controls on underlying transactions, IT developments for eGrants).

Implementation

For this model, it would be important to give due consideration to the supervisory role of the Commission performed by the CIC.

A CBA of pooling common programme implementation and administrative support tasks across EAs would be launched. If needed, a cost-sharing mechanism to finance these centralised service desks would be developed, while avoiding charge back mechanisms. The pooling of resources would be reflected in the Establishment Acts.

(iii) Create a limited number of large EAs by thematic portfolio, each serving a wider range of programmes that form part of a coherent family of activities. This model offers greater room for manoeuvre, with re-allocations of positions and staff carried out seamlessly as intra-agency adjustments/mobility. This model would build on the improvements described in recommendation 1.

Problem statement

The planned increase in budget to be implemented under direct management for the MFF period 2028-2034 compared to the one of 2021-2027 could amount to more than a doubling. In addition, a key feature of the new MFF period will involve higher flexibility in budget allocations than today.

Proposed solution

Larger EAs offer better opportunities to respond, in an agile manner, to changing priorities. Larger EAs would have more opportunities and a faster response time for mobilising critical mass and operating adjustments in the allocation of resources.

Streamlined supervision thanks to a limited number of EAs, even if the supervised entity is big. Analysing performance, benchmarking, financing and decision-making will become more harmonised and less fragmented.

Implementation

Well-thought-through governance arrangements would be key to the success of this model given the challenges attached to large structures.

Larger EAs would require a tailored management structure, including for senior management. For instance, it could be structured around Directorates, each headed by a Director operating as delegated Authorising Officer, and a coordinating senior manager (AHCC).

(iv) Replace EAs by programme implementation Offices (PIOs). Integrate EAs into the Commission in the form of Offices to address the challenges in terms of agility, effectiveness, efficiency and attractiveness identified in the problem statement for recommendation 1.

Proposed solution

By abolishing the current mode of separate legal entities, the rigid legal framework of EAs will no longer apply to PIOs. The expectation is to simplify the governance (each Office would have a DG of attachment and an Advisory Committee – see recommendation 1 on Offices) and improve oversight and agility through staff mobility.

All staff in PIOs would have a contract with the Commission, thus increasing Commission total staff number by some 10% and making staff transfers across PIOs fluid. Moreover, staff in PIOs will have career opportunities within the Commission.

Implementation

Budgetary impact on the financing of Offices: based on Article 65 of the Financial Regulation, the operating costs for the Offices are paid from the administrative heading. On the contrary, the operating costs of EAs are financed by administrative budget envelopes earmarked in the operational programmes that they implement. Converting EAs into Offices would have a dramatic impact on the tight Commission administrative budget heading.

For PIOs to be created by 1 January 2028, **amendments to the Financial Regulation Art. 69 and Art. 2** would have to be fast-tracked.

Implications for TA2f and CA3a moving from an EA into an Office: today, Offices do not employ TAs under Article 2f who are reserved to EAs. The Commission could adopt specific implementing rules (and amend the current ones) to allow employment of TA2a for indefinite duration in Offices. However, this would take time, probably re-open other TA-related issues requiring lengthy

discussions with stakeholders and involve the budgetary authority which would have to create and qualify the posts as temporary.

Possibility of ‘transfer en bloc’ of staff to be explored: in the preceeding MFF period, staff was moved from one EA to another with their own contracts, keeping duration, grade and seniority. Legally, a transfer of staff is feasible between entities that belong to the same category and that are controlled in the same way. This would mean that moving TAs and CAs from EAs to Offices would run via recruitment procedures without full recruitment guarantees for the current circa 700 TAs and circa 2800 CAs in EAs.

Recommendation 6: Enhance EAs capacity to manage new instruments

With the next MFF, EAs will have a more recurrent engagement with dual-use technologies/projects, and possibly with industrial military development support. Compared to today, defence spending will likely score a four time increase in budget. In addition, programmes will be implemented through an enlarged toolbox covering more procurement, loans and blended financing instruments.

Problem statement

A limited capacity, know-how and practical resources

Currently, dual use by design (i.e. financing of technology and/or infrastructure addressing both civil and defence application) is off the scope of most EU funding programmes. As a result, EAs have limited implementation experience. With an expected increase of such calls in the next MFF, EAs will face multiple challenges:

- Security and confidentiality constraints: EAs already manage some EUCI information, but this is not yet widespread.
- Practical arrangements such as access to secure zones and widespread security clearance of staff.
- Knowledge on procurement in defence spending: EAs manage grants, while defence procurement in the next MFF will be prominent.

A full Commission in-house implementation: today, directly managed programmes for defence applications are not delegated to EAs and are implemented by the Commission in DG DEFIS.

EAs have developed strong expertise in the management of grants and have less experience with other intervention instruments such as procurement, loans or equity.

Proposed solution

It is proposed to design a **tailored solution for implementation of defence spending, including dual use** (Horizon Europe collaborative research and EIC).

The CBA for the EAs' mandate for the next MFF can consider many options ranging from keeping in-house management, to a full or partial delegation to EAs, or a mixed implementation model allowing active participation of the EU/Commission, the Member States and the industry. The choice of model would have to consider the specificities of the defence domain.

Increase expertise of the EAs for programme implementation via procurement, grants and loans through targeted recruitment and transfer of knowledge from the Commission to the EAs.

Implementation

For dual-use in Horizon Europe and defence activities under Horizon Europe EIC, the **Commission would design a clear framework of cooperation** between DGs and EAs covering priority-setting, programming, governance and F2P.

EAs would need to develop **new expertise**, notably with knowledge transfer through Commission seconded staff.

Commission would **develop and provide access to secure zones**, security clearance of EAs' staff, management of encryption keys, wider training on the handling of EUCI and improved expertise on procurement for EAs.

Recommendations on Decentralised Agencies

Take a strategic approach to the Decentralised Agencies landscape through consolidation, updating of mandates and mergers, pursuing synergies and efficiencies in the running of the DAs and enhancing their governance.

Decentralised Agencies (DAs) are independent bodies with their own legal personality and governance structure performing a variety of different tasks. They are created by the legislator through founding acts based on different legal bases and at different times. They have their seat in a Member State.

DAs are directly accountable through separate discharge. As EU bodies, they must respect the financial and staff rules, with some specificities and derogations.

DAs have administrative autonomy and are not part of the Commission. At the same time, the Commission must fulfil its budget implementation duties in financing DAs, has responsibility for the implementing rules to the Staff Regulations in the DA, has the right of initiative, as well as the responsibility to ensure the proper application and enforcement of EU law.

The 2012 Joint Statement and [Common Approach](#) on EU DAs agreed by the three EU institutions has put in place a comprehensive non-binding set of guiding governance principles. However, there is much to be done to align the current complex landscape to the Common Approach and fully use its potential.

Governance responsibilities are complex and heavy for each DA and often vary markedly notwithstanding efforts at streamlining. The multiplication of DAs only compounds this burden. The cost and staffing of DAs have steadily increased, and are expected to increase even further, while only some are (partially) fee-financed.

The first recommendation aims at consolidating the landscape of DAs through partial and full mergers and, in appropriate cases, discontinuation. The second recommendation takes a restrictive approach to new DAs. The third recommendation seeks to enhance synergies and cost-efficiency amongst DAs through the pooling of support and administrative services. The fourth recommendation aims at enhancing the administrative oversight of the DAs, including by the Commission.

Recommendation 7: Consolidate the number of DAs

The number of DAs steadily increase, as do their allocated budget, staff and the contribution of the EU budget to their functioning. It is recommended to consolidate the number of DAs through partial or full mergers and, in appropriate cases, discontinuation. Given the multiple legal bases, a realistic time horizon to complete this recommendation would run until 2034 (start of the following MFF).

Problem statement

Even if the rationale for many DAs is clear and remains valid, **the establishment of the DAs looked at historically can often be seen as responding to specific policy priorities of a particular moment**; as a result, a number operate in closely related policy fields. Only one DA has ever been discontinued, none has been merged with another.

Many DAs are very small (below 150 staff), yet each DA has its own administrative overhead which takes up a disproportionate amount of their resources, as well as creating inefficiencies.

The seat is a matter of intense competition between individual Member States (and today co-decided by the European Parliament and the Council). DAs are scattered across the Union. Whilst there are good arguments for a decentralised geographic distribution, this has to be balanced with practical concerns such as ease of access, efficiency costs and the ability to attract and retain staff and their families. Hosting Member States have a role to play to provide attractive conditions (building/offices facilities, schools, job market for spouses, etc.).

DAs are periodically evaluated, but **these evaluations are taking place in isolation**, as per the legal base, without a cross-cutting horizontal exercise to consider the need and scope for horizontal rationalisation.

Proposed solution

Employing a cluster-based approach as a tool, it is recommended to carry out an over-arching assessment with a view to **identifying where there is scope for consolidation, updating or discontinuation**, looking at the principles of relevance, efficiency and effectiveness.

The case for merger is compelling for many small DAs. The assessment could in particular examine possible mergers of small DAs operating in similar policy areas (for example EIGE and FRA, CEDEFOP and ETF). Likewise, it could examine cases for merger where a small agency is active in a policy-based cluster where another larger agency also operates (for example, in the case of EUROPOL and CEPOL or CPVO and EUIPO).

Seat-related issues are likely to arise but can be mitigated by considering full or partial mergers. This could imply maintaining separate locations but merging certain functions (unified senior management and administrative functions) and/or tasks. Another advantage would be to reduce the overheads implicit in the governance of the current DA landscape for all involved.

Implementation

The Commission should carry out an **overarching assessment** of the DA landscape focussing on identifying opportunities to consolidate their number. This work should primarily focus on staff size but also include characteristics such as location and nature of tasks.

Among the 35 DAs, 13 have a headcount below 150 staff: BERECA (36), CEDEFOP (120), CEPOL (57), CPVO (57), EFCA (93), EIGE (47), ELA (144), ENISA (130), ETF (128), EUDA (134), EU-OSHA (65), EUROFOUND (105), FRA (105).

Methodology: DAs are not a homogeneous group. A flexible **cluster-based approach** is suggested for a more targeted and strategic analysis of challenges and opportunities for all four recommendations. Characteristics to be considered:

- Work/policy area: EUAN clusters, Partner DGs (e.g. DG SANTE, DG EMPL, DG HOME).
- Location: Member State, city, region (e.g. EUROJUST and EUROPOL are in The Hague).
- Size: staff and budget size.
- Funding model: EU budget (e.g. ELA), fee-financed (e.g. EUIPO).
- Nature of tasks: Regulatory, advisory, supervisory, operational.
- Relationship with national authorities: Coordination between EU and national levels (e.g. enforcement tasks).

The analysis should focus on several **clearly identified questions**, including:

- Is there a rationale for merging DAs fully or partly following the clustering approach described below?
- Have overlaps of tasks between DAs been identified? Which solutions have been identified to address them that can be scaled up?
- Have shortcomings in relation to governance been identified? Which solutions have been identified to address them that can be scaled up?
- Have options for synergies and efficiencies been identified? Which solutions have been identified that can be scaled up?

Sources: The assessment should not duplicate work such as evaluations and impact assessments, but rather **draw on and leverage existing data**, notably: agency evaluations, impact assessments, Single Programming Documents (SPD) and Commission opinions on them, consolidated Annual Activity Reports, IAS reports, ECA reports, EP discharge reports, Ombudsman's guidance and recommendations. The Commission's ongoing simplification work and in particular the deep cleaning of the acquis would also provide input.

Who: It is suggested to set up a **Commission Task Force** composed of central services. This Task Force should cooperate closely with and draw on the expertise of the DGs and EUAN.

Timeframe: starting now, and to be completed well before the MFF proposal for the period starting in 2034.

Outcomes: Where a **clear case for a merger can be made, the respective legislative proposals should be prepared**. This could be a mini Omnibus of two proposals in case two DAs are merged, it could be a larger Omnibus if more candidates have been identified. Whilst there might be governance or legal issues to consider, they can be navigated with innovative approaches.

Points of attention: Reflections on consolidation should take into account a number of elements: resistance to mergers; the fact that cost savings will not materialise immediately and will need to be carefully assessed; concerns about diluting mandates; reduced specific sector links and expertise. Special attention will have to be given to the impacts of relocation on staff, possibly looking at experiences with the move of EMA and EBA following Brexit.

List of DAs indicating size, portfolios and other characteristics

Year	Acronym	Agency	Location	Staff in 2025	DG	EUAN cluster
2009	BEREC Office	Body of European Regulators for Electronic Communications	Riga (Latvia)	36	DG CNECT	Supporting EU Business and Innovation
2006	EIGE	European Institute for Gender Equality	Vilnius (Lithuania)	47	DG JUST	Ensuring an Area of Freedom, Security and Justice
2005	CEPOL	European Union Agency for Law Enforcement Training	Budapest (Hungary)	57	DG HOME	Ensuring an Area of Freedom, Security and Justice
1994	CPVO	Community Plant Variety Office	Angers (France)	57	DG SANTE	Supporting EU Business and Innovation
1994	EU-OSHA	European Agency for Safety and Health at Work	Bilbao (Spain)	65	DG EMPL	Fostering Citizens' Well-Being
2005	EFCA	European Fisheries Control Agency	Vigo (Spain)	93	DG MARE	Fostering Citizens' Well-Being
1975	EUROFOUND	European Foundation for the Improvement of Living and Working Conditions	Dublin (Ireland)	105	DG EMPL	Fostering Citizens' Well-Being
2007	FRA	European Fundamental Rights Agency	Vienna (Austria)	105	DG JUST	Ensuring an Area of Freedom, Security and Justice
1975	CEDEFOP	European Centre for the Development of Vocational Training	Thessaloniki (Greece)	120	DG EMPL	Fostering Citizens' Well-Being
1990	ETF	European Training Foundation	Torino (Italy)	128	DG FISMA	Supervising Financial Systems
2004	ENISA	European Union Agency for Cybersecurity	Athens (Greece)	130	DG EMPL	Fostering Citizens' Well-Being
1993	EUDA	European Union Drugs Agency	Lisbon (Portugal)	134	DG CNECT	Supporting EU Business and Innovation
2019	ELA	European Labour Authority	Bratislava (Slovakia)	144	DG HOME	Ensuring an Area of Freedom, Security and Justice
2024	AMLA	Anti-Money Laundering Authority	Frankfurt (Germany)	150	DG EMPL	Fostering Citizens' Well-Being
2009	ACER	Agency for the Cooperation of Energy Regulators	Ljubljana (Slovenia)	185	DG ENER	Supporting EU Business and Innovation
2004	ERA	European Union Agency for Railways	Valenciennes (France)	206	DG MOVE	Supporting EU Business and Innovation
2011	EIOPA	European Insurance and Occupational Pensions Authority	Frankfurt (Germany)	222	DG FISMA	Supervising Financial Systems
1994	CdT	Translation Centre for the Bodies of the European Union	Luxembourg	223	DGT	Fostering Citizens' Well-Being
2011	EBA	European Banking Authority	Paris (France)	270	DG FISMA	Supervising Financial Systems
2002	EMSA	European Maritime Safety Agency	Lisbon (Portugal)	273	DG MOVE	Supporting EU Business and Innovation
2002	EUROJUST	European Union Agency for Criminal Justice Cooperation	Den Haag (The Netherlands)	288	DG JUST	Ensuring an Area of Freedom, Security and Justice
1994	EEA	European Environment Agency	Copenhagen (Denmark)	311	DG ENV	Fostering Citizens' Well-Being
2021	EUSPA	European Union Agency for the Space Programme	Prague (Czech Republic)	341	DG DEFIS	Providing Security and Defence
2004	ECDC	European Centre for Disease Prevention and Control	Stockholm (Sweden)	358	DG SANTE	Fostering Citizens' Well-Being
2011	ESMA	European Securities and Markets Authority	Paris (France)	416	DG FISMA	Supervising Financial Systems
2012	eu-LISA	European Union Agency for Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice	Tallin (Estonia)	473	DG HOME	Ensuring an Area of Freedom, Security and Justice
2014	SRB	Single Resolution Board	Brussels (Belgium)	533	DG FISMA	Supervising Financial Systems
2002	EFSA	European Food Safety Authority	Parma (Italy)	586	DG SANTE	Fostering Citizens' Well-Being
2010	EUAA	European Union Agency for Asylum	Valletta (Malta)	630	DG HOME	Ensuring an Area of Freedom, Security and Justice
2007	ECHA	European Chemicals Agency	Helsinki (Finland)	636	DG GROW	Fostering Citizens' Well-Being
2002	EASA	European Aviation Safety Agency	Cologne (Germany)	815	DG MOVE	Providing Security and Defence
1995	EMA	European Medicines Agency	Amsterdam (The Netherlands)	952	DG SANTE	Fostering Citizens' Well-Being
2010	EUROPOL	European Union Agency for Law Enforcement Cooperation	Den Haag (The Netherlands)	1183	DG HOME	Ensuring an Area of Freedom, Security and Justice
1994	EUIPO	European Union Intellectual Property Office	Alicante (Spain)	1410	DG GROW	Supporting EU Business and Innovation
2004	FRONTEX	European Border and Coast Guard Agency	Warsaw (Poland)	3434	DG HOME	Ensuring an Area of Freedom, Security and Justice

Recommendation 8: A restrictive approach to new DAs

Problem statement

Efforts to consolidate the DAs landscape should also be pursued when considering the need for a new DA or for new tasks to be delegated.

Proposed solution

Unless an imperative need can be established, there should be a **moratorium** on the creation of a new DA. Each time new tasks at EU level are envisaged and the use of an agency is considered, the following steps should be followed:

- First, a **thorough reflection is needed on the relevance of the tasks** and whether they are not already performed either by the Commission or by Member States.
- Second, there should be a reflection **to whom these tasks should be entrusted**: is the autonomy and complex governance of DAs really needed/justified for the tasks at hand? Would that not be better performed in the Commission?
- Finally, whenever there are new justified tasks, the preferred option should be **to allocate them to an existing DA**, updating its tasks.

Implementation

The Commission should fully apply its Better Regulation Toolbox and the existing guidance.

Whilst there might be governance or legal issues to consider in the case of adding new tasks to existing DAs, these can be navigated with innovative approaches.

Recommendation 9: Pool support services across DAs and exploit other synergies

In the course of the MFF period starting in 2028, the Commission, together with EUAN, should facilitate efforts to pool support services across DAs.

Problem statement

Efficiency gains that could emerge from seeking synergies between the Commission and DAs and between DAs themselves are today not fully exploited. There are plenty of good examples, but general uptake is not yet taking place.

There are several reasons for this, including the legal and practical boundaries established by the often heavy one-by-one agreements/SLAs. It is therefore a challenge to explore the potential for joined services amongst DAs.

Proposed solution

Pool **administrative, IT, human resources, procurement, finance and accounting, external communication support and cybersecurity services** among DAs. Certain support functions of some DAs could be merged, for example based on geographical or policy links.

In addition, consolidate the service offer of the Commission through service packages and facilitated contribution agreements with a **single standard SLA**. Uptake should be facilitated by addressing DAs' call for a unified costing model adapted to their size (and budget) and their involvement in the development of tools as users.

Use the full potential of evaluations: they should provide solid grounds for a decision to continue or discontinue the agency's mandate but also allow to identify possible synergies and efficiency gains and address task reallocation, including updating and discontinuing redundant tasks. The use of Key Performance Indicators should be encouraged. The results of the evaluations would be followed up at Commission and DA level but also discussed with co-legislators.

Use the **potential of the Framework Financial Regulation (FFR) to promote synergies**, e.g. through the Commission opinions on the DAs' SPD on the various strategies (on efficiency gains and synergies, on the use of performance indicators and on the benchmarking exercise). Consider whether amendments to the FFR could allow for more synergies (e.g. facilitate pooling accounting services or extend the practice of joint Accounting Officers).

Promote inter-agency cooperation on short term projects, such as crisis response and a flexible use of DAs expertise, for example through joint task forces and cross-agency projects enabling to respond to cross-cutting priorities without a change of mandate. It would build on existing examples:

- Use of ARES, SYSPER, SUMMA and other IT tools.
- ENISA, EIT and EFSA signed in 2026 a MoU in the context of an EUAN pilot project that deploys synergies on cybersecurity, procurement and HR issues. All the other DAs were invited to join.
- Central role for ENISA towards DAs in the Interinstitutional Cybersecurity Board (IICB) where EUAN plays an important coordination role.

- Europol has undertaken various joint procurement initiatives, in particular with other DAs co-located in the Netherlands and the EUAN has set up a procurement officers' network.
- Eu-LISA provides back-up IT hosting services to other DAs and is working on a broader strategy.
- EIOPA and AMLA: will use joined office spaces in Frankfurt and plan far-reaching cooperation on several functions.
- The JHA DAs, following the setting up of a working group on synergies initiated by DG HOME, launched three joint recruitment processes for generic job profiles common to the different DAs.

Ensure access to and most efficient use of agency expertise: Factor in from the start access to expertise from DAs by the Commission to avoid legal hurdles. For existing tasks, facilitate ad hoc requests to DAs and develop MoUs between DAs and the Commission.

Consider setting up a central support function for administrative and cross-cutting tasks for several or all DAs. **Alternatively**, as per recommendation 3 on Offices, interinstitutional service delivery of tasks performed by Offices could be broadened to DAs. It could be for instance considered in relation to translation services, through the integration of the Translation Centre for the Bodies of the EU in a newly created Office (while the same legal constraints would apply as described for recommendation 2 point iv on EAs).

Implementation

The overarching assessment (recommendation 1) will identify synergies and allow to develop an overview of DAs of similar size and/or with a comparable operational model. The Commission could use different mechanisms to implement the findings:

- Commission offering services to DAs through packages.
- One DA offering certain services to some or all other DAs against payment.
- Legislative change to merge certain support services between DAs.

Recommendation 10: Enhance DAs governance

Problem statement

Good governance is a collective responsibility of EU institutions, Member States and DAs' governance bodies. But it is a heavy and time-consuming responsibility that has to be combined with competing tasks.

The management boards (MB) of DAs are key and are mainly composed of Member State representatives. Too often they do not discuss strategic issues, are burdened by administrative processes that are difficult to comprehend and do not act collectively as a board, but rather as a collection of national positions.

As a result, the burden often falls on the Commission representatives in the board, working together with the Chair.

The role and influence of the Commission vary however greatly, depending on each basic act, its internal governance and processes, its financing structure and established relationships between the agency and the partner DG. The Common Approach and the FFR give the Commission levers that could still be better exploited.

It is challenging for Commission services to perform these various oversight functions in terms of coordination and resources required and because of DAs' significant autonomy. However, the Commission must fulfil its oversight role and **is often held responsible for DAs.**

Proposed solution

Simplify agency internal processes and related Commission rules and procedures. It is recommended to optimise coordination and supervision of DAs in the Commission and ensure appropriate expertise (e.g. a dedicated DA coordinator within partner DGs). Align the organisation of oversight and cooperation by clusters for more efficiency. Ensure structured dialogue and coordination with DAs at various levels.

This can be done by strengthening **central coordination of the Commission's role** further through a **central hub** for DAs, composed of central services working closely with DGs, to collect and promote best practices and be the central focus point for the EU Agencies Network (EUAN).

Include DAs in the ongoing **simplification and burden reduction** exercises, for instance suggesting and cooperating with EUAN on simplified SPDs or reporting.

Insert an alert mechanism in founding acts when revising them or proposing new ones. Following the example of the recent EMSA revision, introduce a procedure inspired by the Common Approach alert mechanism. This mechanism provides that if the Commission raises serious concerns on a proposal for decision presented to the MB on matters related to the FFR for DAs and the Staff Regulations, the adoption of the decision must be postponed, possibly revised and be adopted with a higher voting threshold.

Propose the **inclusion of an executive board in the founding act** where appropriate and provide for a clear mandate to prepare board decisions on horizontal and administrative matters, or in specialised areas.

Systematically require induction and other support for chairs and board members:

- **Develop cooperation arrangements** with the MB and its chair.
- Pay attention that the **Chair is adequately supported** by the secretariat and by supporting tools, consider a dedicated forum for Chairs.
- Use **induction trainings** for new executive directors, Chairs and management board members.
- Introduce **mechanisms for cooperation** between Commission Senior Management and DAs' Executive Directors and ensure a regular dialogue (joint committees, regular meetings).

Implementation

This recommendation would require:

- Practical adaptations to the Commission's way of working with DAs and reprioritisation of staff.
- Use of MoUs between DAs and the Commission to clarify cooperation and communication lines, for example to specify which topics need to be brought to the attention of the MB.
- Changes to existing Commission guidance, for example on the SPDs.

Finally, when founding acts are revised, it would be key to ensure the inclusion of proven governance provisions (e.g. alert mechanism), using standard provisions.

Executive summary the Commission's presence in Member States

Over time, the Commission's responsibilities have increased. In many areas, EU policies impact citizens, businesses and public authorities directly. For its legitimacy and credibility, the Commission must engage better with the realities in Member States. This requires a better understanding of the diversity of national priorities and specificities. An essential component of a better engagement with national authorities, stakeholders and citizens is improving its presence in the Member States, which this report defines in the broadest sense. An improved presence is necessary for better political buy-in, more legitimacy with national governments and increased public support.

The recommendations of this report aim to integrate the various aspects of this presence into a Commission-wide strategy and approach, connecting the dots – people, policy, communication and country expertise – in order to maximise the relevance of our work, improve the use of resources, and make policies more impactful, practical and effective. They address the changes needed within the Commission structures and processes to increase the quality, credibility and impact of our work.

Recommendations

1. Strategic country expertise and engagement: a new way of working together

By working differently, the Commission could turn its collective country expertise into a real asset for policymaking and improve its engagement with the various actors in the Member States. A strategic steer with Commission-wide country teams leveraging the Commission's vast country expertise would break silos, facilitate regular country-specific strategic discussions at political level, and establish a more comprehensive, agile and collaborative culture within the Commission.

2. Upgrade the Commission Representations for better policymaking and outreach

To upgrade our Representations in the Member States, we propose strengthening their capacity to proactively enable policy engagement and serve as a sounding board for EU policymaking – where Representations are often an afterthought from headquarters –, complementing their communication and outreach activities. We suggest clarifying their place within the Commission to anchor them at the heart of the Commission's central policy coordination, thus

enabling them to drive impact where it matters most. This will also put them on a stronger footing in national contexts.

3. Make working in the Member States more attractive and impactful

We propose developing and rewarding country expertise among our staff and to enhance the attractiveness of working in the Representations. To mobilise the right profiles for the Representations, we need a modern talent strategy offering agile career paths from an early career stage on, a Commission-wide marketplace for talent to match skills with needs in Representations, and support for career development, mobility and the return to headquarters, along with an attractive rewards package. Furthermore, embedding Heads of Representation in the Commission decision-making process would give them a better standing, also in the Member States.

4. Optimise the engagement ecosystem

We should strive for a more coherent presence of the Commission in the Member States. We propose to be more effective and streamline outreach channels present physically in the Member States, notably Commission-information networks, to strategically engage with other EU institutions and bodies, and to strengthen our staff's regional and local outreach in key policy discussions. Furthermore, we suggest deepening our staff cooperation with Member States authorities through staff exchange programmes that create the necessary bonds and a sense of belonging to the same European public service ecosystem. Last but not least, we propose reconnecting with schools and the public by expanding dedicated schemes and encouraging Member States to integrate education about the EU into national school curricula.

Recommendations on the Commission's presence in Member States

The Commission's presence in the Member States of the European Union (EU) serves as a bridge between Brussels and national and local realities. Complementing its institutional cooperation with the Council and the European Parliament, it is an essential component of its engagement with national authorities, stakeholders, and citizens, and takes many forms, ranging from daily political communication from headquarters, members of the College of Commissioners and Directorates-General (DGs) interacting with national authorities and stakeholders, to a permanent presence on the ground in the form of Commission Representations.

On top of the objectives of the large-scale review to make the Commission more agile, efficient and attractive, this workstream has also identified an overarching goal: namely to enhance mutual understanding between the Commission and Member States and to strengthen the trust of citizens. This is a critical factor for the legitimacy and effectiveness of the Commission's work. An ad hoc or static approach to how Commission services interact with Member States (i.e. without a country strategy and overall coordination) can erode this trust and limit the Commission's ability to effectively address challenges.

The Commission's increased responsibilities and the greater impact of EU policies have raised the stakes in recent years, with the Commission taking on ever more sensitive tasks that affect citizens directly (e.g. national policy reforms as conditionality for EU funding; increased use of regulations rather than directives; housing, health and energy-related decisions in response to recent crises; growing lead and steering role on migration, defence and security issues; support to Ukraine and the prospect of enlargement). As a result, the EU's action has become increasingly multifaceted, with a growing entanglement and blurring of responsibilities between levels of governance.

At the same time, political populism and disinformation can undermine the legitimacy of its work.

In this context, the Commission must be able to understand and embrace the diversity of national priorities and specificities to an unprecedented degree and stay in tune with the (changing) realities in our Member States.

Policy success depends not only on technocratic excellence, but also on political buy-in, legitimacy with national governments, and public support across the EU.

To strengthen the Commission's relationships with Member States, we must consider the Commission's presence in its broadest sense: from its headquarters

to its action on the ground, encompassing all engagement at political and administrative levels. This includes, for example, presence through Representations, location sites, networks, official visits and participation in events, negotiations, policy consultations, citizen engagement, political communication, as well as staff exchanges with national authorities.

We must also consider the vast country expertise and knowledge among our staff, which must be better connected, recognised and mobilised.

By strategically integrating all aspects of this presence into a Commission-wide approach to country expertise and better policymaking, the Commission can maximise the relevance and impact of its work, improve the use of its resources, and make its policies more impactful, practical and effective.

Our recommendations aim to change the Commission's structures and processes in order to increase the quality, credibility and impact of its work on the ground. This means transforming how the Commission manages its relations with the Member States, organises country expertise across the Institution, leverages the role of its Representations, and optimises the use of related networks and engagement channels.

In our report, we put forward four main recommendations:

- First, we underline how working differently together could help us boost our collective country expertise and engagement capacity. This could be done through a strategic steer of Commission-wide country teams, who would be able to leverage the expertise spread across the institution and present in Member States, and who would have the capacity to “feed in / feed out” information in a disciplined and agile manner in light of national specificities (**Recommendation 1**).
- Second, we propose to upgrade our Representations in the Member States and focus their work more on policy engagement, complementing their communication and outreach activities, and to clarify their place within the Commission. This would put them on a stronger footing in national contexts (**Recommendation 2**).
- Third, we identify practical ways to develop and reward country expertise among our staff and to enhance the attractiveness of working in the Representations (**Recommendation 3**).
- Fourth, beyond the Representations, we propose ways to increase the effectiveness of the multiple and fragmented engagement and outreach channels present in our Member States, often funded by EU money, and expand staff exchanges within a European public service ecosystem. (**Recommendation 4**).

The **workstream** brought together **various sources of expertise** on collaboration with Member States and drew on diverse perspectives from across the Commission. Our team included members with insights from a diversity of policy areas and experience of managing Commission sites in Member States, working in various DGs, heading Commission Representations, participating in Commission task forces in Member States, or serving in national authorities.

Our **methodology** combined **multiple sources of input**: over 25 dedicated workstream meetings, findings from the large-scale review benchmarking exercise, a survey among Representations, contributions from the high-level group and the suggestion box, findings from the Commission's staff survey and other input from Commission colleagues, and our own targeted surveys with Directors-General and senior-level Member States contacts. We supplemented this with insights from exchanges with current and former top Commission officials, Commissioners, civil servants in other EU institutions (notably the European Parliament), and exchanges with other large-scale review workstreams.

Recommendation 1: Strategic country expertise and engagement – a new way of working together

Why? The EU consists of diverse Member States, each with its own unique set of challenges, opportunities, and priorities. From the common elaboration, approval and delivery of the future National and Regional Partnership Plans to addressing hot political issues (like competitiveness, energy, migration, security and defence or the future of our Union), the Commission must constantly navigate a complex and dynamic landscape of national policy priorities and stakeholders' interests.

The Commission maintains multiple engagement channels with Member States, but **its approach is not strategic** and **remains largely scattered**. DGs tend to work in silos, focused on their policies and stakeholder groups, often ignoring other DGs and the Representations in Member States. As a result, the Commission's presence is hardly proportionate or optimal considering the overall EU policy objectives and national priorities. In many cases, multiple DGs are engaging simultaneously with national stakeholders in a non-coordinated manner.

Moreover, although the Commission collectively holds immense country knowledge, the information is spread out, fragmented, at times overlapping and not fully visible or equally accessible across the institution. Previous attempts to integrate country knowledge across the Commission suffered from insufficient oversight, animation, steer and ownership.

The **lack of strategic direction and efficient country-knowledge management** weakens policy coherence and reduces the Commission's credibility and leverage to act. It can lead to a loss of synergies, to confusion and contradictions, to dissonance, insensitivity or overreach. This has been witnessed, for instance, in actual cases of several DGs going on missions in a Member State at the same time to meet similar stakeholders without coordinating or even knowing about each other.

These are **not new issues**, and there are **useful building blocks** which can be used to devise a more strategic approach to country expertise and engagement across the Commission. One example is the **European Semester**, where country teams of colleagues work across DGs to follow socio-economic and budgetary priorities in our Member States. These teams were essential for devising national reform and investment priorities under the post-covid Recovery and Resilience Plans and have been working hand-in-hand with national authorities over the years. The prospect of even more integrated **National and Regional Partnership Plans** will help improve coordination among DGs.

However, precious as they are, such ways of working and sharing country expertise have their limits. They essentially concern socio-economic priorities, and neglect sensitive domains such as migration, industrial policy, trade, agriculture, rural development, defence, rule of law, enlargement, or institutional discussions about the future of the Union.

What? We propose to establish a centrally coordinated and strategic approach to the relations with each of our Member States, that embodies the 'one Commission, one voice' principle. This means working as a unified institution where all our relevant resources and expertise can be tapped into to serve common goals rather than operating in silos, thus enabling the Commission to speak, engage and deliver as one in our Member States.

How? This requires:

- strategic steer of country expertise and engagement for each of our Member States;
- recognised Commission-wide country teams with a clear 'who does what', responsible for facilitating cross-Commission collaboration, to feed policymaking as well as local engagement in Member States;
- better country expertise across the Commission, transforming the existing, dispersed and sometimes overlapping country knowledge into an efficient, actionable asset and a decision-making driver;
- a central country analysis capacity that leverages digital tools and AI as enablers for (i) integrating country knowledge, (ii) facilitating policy

coherence, and (iii) addressing coordination challenges in an agile, non-bureaucratic manner;

- a regular review of relations with Member States at political level.

Problem statement

The Commission's approach to country expertise and engagement suffers from several critical gaps.

- **Lack of strategy and centralised coordination**

DGs frequently engage with national authorities individually on their policies, with the risk of overlaps or contradictions, and suboptimal leverage as a result. For example, policy implementation dialogues with Member States are not coordinated among DGs or with central services or the respective Representations. At present, the Heads of Representations are not fully included in the preparations for the negotiations on the National and Regional Partnership Plans.

This lack of overall steer often leaves the Commission in a reactive and defensive mode. According to our **survey, Directors-General** indicate a lack of coordination and synergy across DGs when interacting with Member States, compounded by time constraints and unclear communication channels. To play a better role, Representations need and demand better and quicker access and interactions with headquarters, including clearer contact points.

- **Approaches not sufficiently tailored to the size of challenges and diverse realities in Member States**

A 'one-size-fits-all' approach is not efficient or appropriate, because Member States vary so much in so many respects. For example, in population (ranging from around 0.5 million to over 80 million people), land area (from under 300 km² to over 600 000 km²), economic size (with ten countries each accounting for less than 1% of the EU's total GDP, while the three largest economies represent more than half), geographical location (land-locked, islands, etc.), external or internal borders etc.

- **Underutilised Representations**

When it comes to policy engagement, Commission headquarters often treat Representations as an afterthought or dismiss them as mere 'travel agencies' or logistical support for high-level visits rather than as valued strategic partners on the ground. This perception overlooks their unique insights into national realities, stakeholder networks, and implementation challenges. Conversely, Representations perceive themselves as

decoupled from many policy parts of headquarters, with limited opportunities to contribute to policy development.

Headquarters consciously (due to sensitivity concerns) or unconsciously undershare information with the Representations, often leaving them without critical substantive information about policies or missions. Information sharing by headquarters, whether deliberately (due to sensitivity concerns) or involuntarily, is insufficient, frequently leaving the Representations without critical substantive information about policies or missions. This forces them to independently develop expertise, as they are confronted with national stakeholders to present or explain the Commission position on any topic. Meanwhile, reporting back to headquarters remains underused. Through the **suggestion box**, staff have also signalled the need to better use the Representations' potential and to better communicate and cooperate with headquarters.

- **Fragmented architecture of country knowledge and responsibilities**

Country knowledge is significant but remains scattered across DGs and respective responsibilities are not clear. According to our **survey**, for obtaining critical country knowledge, **Directors-General** currently tend to rely more on external contacts in the Member States (such as Member States' Permanent Representations) than on the Commission's own internal sources, which creates potential dependencies.

Teams working on the European Semester and the Recovery and Resilience Facility have pioneered new ways of working together, but these teams do not cover the full breadth of EU policies and our engagement with Member States.

- **Limited strategic knowledge-sharing**

While ad hoc coordination occurs (e.g. during crisis responses or the design of a new instrument like the future National and Regional Partnership Plans), systematic knowledge sharing across DGs remains rare beyond the European Semester.

The inter-service consultation process, though essential, proves insufficient as the primary collaboration channel, and country perspectives are not always sufficiently factored in at the technical stage.

- **Unmet needs for country expertise**

In our **survey**, the most frequent gaps identified by **Directors-General** concern 'policy implementation reality' (i.e. the gap between goals of legislation and how it is actually implemented on the ground), impacts of policies, regional/local specificities, stakeholder mapping, political insights and early warnings – all essential for effective engagement with Member States.

This fragmented approach undermines policy coherence, weakens the Commission's credibility, and prevents it from fully capitalising on its collective expertise to deliver on its strategic objectives.

Proposed solution

The proposed solution establishes a comprehensive framework that encompasses the following aspects:

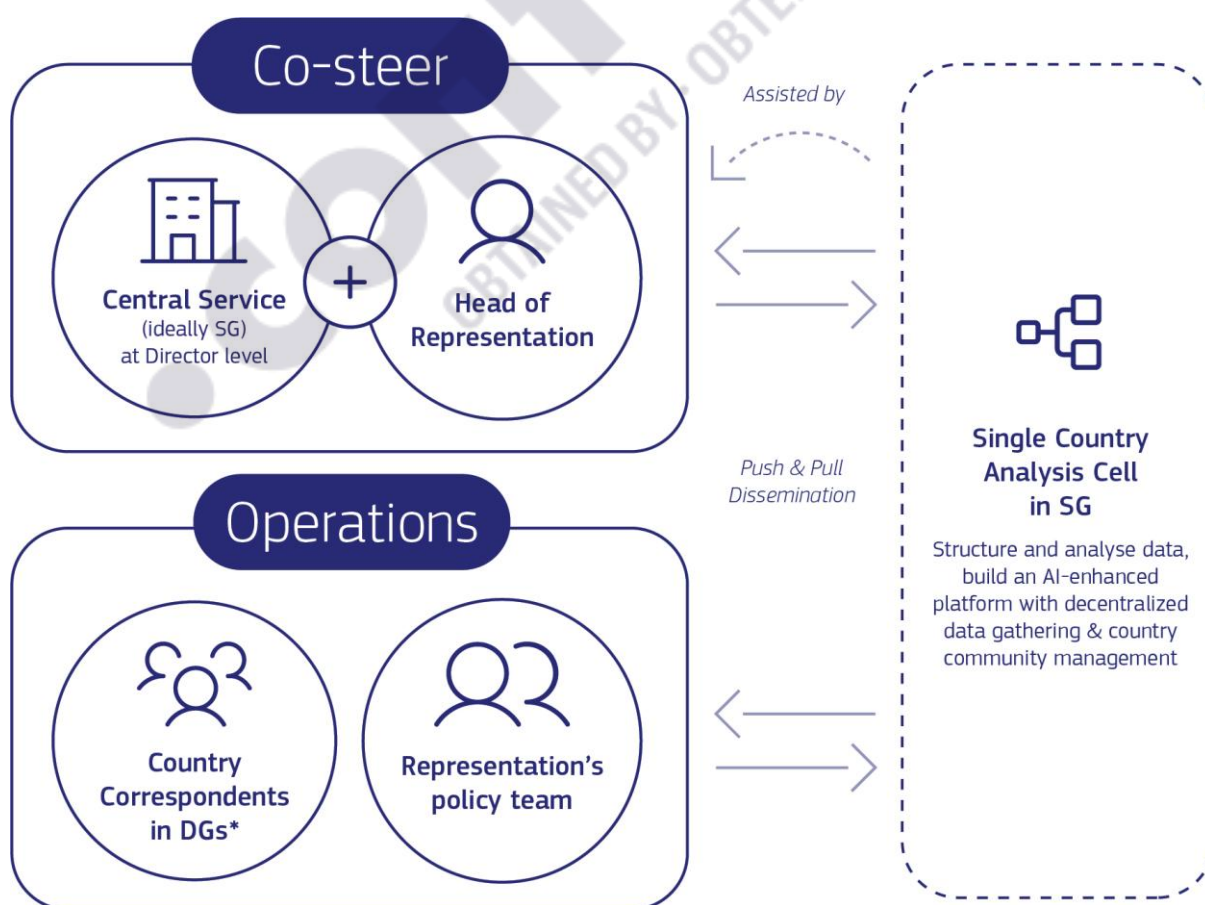
1.1. **Strategic steer of country expertise and engagement for each of our Member States**

- **Commission-wide country teams**, establishing a structured collaboration framework and rapid response capacity for each of our Member States, able to mobilise experts from all DGs together with those from the Representations, to ensure a country-specific strategy, facilitate policy and communication work, and better align engagement efforts.
- **Each team would be co-led** by a senior manager in headquarters and the corresponding Head of Representation, to give a strategic direction, organise the work and call meetings as appropriate. The senior manager in headquarters would ideally be located in the Secretariat-General (SG) to ensure full alignment with and anticipation of the priorities of the College as a whole, operate with politically backed authority and facilitate cross-DG work. Should the Commission move to a more matrix-like structure, it could be examined whether senior managers in other services could play a similar role via such a matrix structure.
- **Establish a clear 'who does what' across the Commission:** There should be designated contact points (country correspondents, e.g. the geographical Directorates and Units where they exist) in each DG for each Member State – incentivised to work in teams across the Commission. DG-level arrangements may vary, and most DGs will continue to roll out their activities directly in the Member States, but the responsibilities of the country correspondents would be similar across the services: i) to be on top of the DG's activities, and of their relative impact and sensitivities, in the Member States concerned; ii) to be ready to contribute and be mobilised (e.g. for the production of urgent lines to take or briefings) as part of the Commission-wide country teams, if necessary by calling on other experts in the DG.

1.2. **Set up a single country analysis cell and platform** as a support for the steering of the Commission-wide country teams, combining centralised support with decentralised expertise collection. This approach proved as best practice in the benchmarking exercise and can be piloted for a number of policy areas and countries. This requires the following:

- **Staffing the cell with data analysts**, mobilised for sense-making, visualisation and presentation, predictive modelling, and trend forecasting. These analysts should work together with the DGs and the Representations for deeper context and analysis before dissemination.
- **Gradually developing a platform consolidating fragmented country knowledge**, leveraging the technological potential through AI-driven data compilation and harmonisation, and transformation of raw information into actionable expertise. For example, maintaining up-to-date, comprehensive country profiles, automatic reports and alerts to relevant DGs and allowing self-service access for deep dives (**push & pull dissemination**), **acknowledging varying sensitivity levels**.
- **Giving the cell a capacity to support the cross-DG work** (e.g. animating the respective country team, ensuring community management across the country teams, managing a Teams channel etc.).
- **Ensuring DGs and Representations contribute with their respective expertise**, with improved capturing of informal knowledge (e.g. through mobile-friendly interfaces).

Figure 1 – Proposed Commission-wide country teams with a single country analysis cell and platform



*This also includes geographic Directorates and units.

- 1.3. **Regularly review relations with Member States at the political level and strategic upfront engagement with counterparts in the** Member States. Within the Commission, this can include more systematic upfront considerations of national diversities (e.g. impact assessments and evaluations), regular country-specific strategic discussions (e.g. at the ‘Groupe des relations interinstitutionnelles’ or in College debates) and procedural linkage with key institutional cycles (State of the European Union Speech, Annual Work Programme). Moreover, both leads of the Commission-wide country teams should regularly discuss and ideally agree priorities for communication and outreach with counterparts in the Member States (typically the coordination authority on EU affairs).

This solution will provide policymakers with reliable, comprehensive and actionable expertise to inform strategic decisions across the Commission, while ensuring secure and efficient information sharing.

Recommendation 2: Upgrade the Commission Representations for better policymaking and outreach

Why? The Representations are the Commission’s most visible, physical presence in the Member States, uniquely positioned to deliver both institutional representation and strategic engagement. Their country knowledge is complementary to that of the DGs and broadens the information that DGs have. Their proximity to national realities gives them an important role in understanding the (potential) sensitivity of issues, the timing for certain discussions, and local perceptions of the EU and the Commission’s work. Their work with national parliaments also helps the Commission better anticipate debates and tailor its engagement accordingly.

However, the Representations’ impact is limited because they are used mainly for delivering corporate messages downstream, after decisions have been taken. This prevents the Commission from anticipating national debates, addressing public opinion early on, and gathering political insights to improve policy design and implementation.

Results from the **survey with Directors-General** show that they expect added value from Representations chiefly in political outreach and early warning, as well as information on policy implementation and communication amplification.

Staff input via the **suggestion box** also confirms the need for strengthening the Representations, notably with policy officers, covering key policy areas.

What? To maximise their potential, Representations should be positioned as proactive enablers of policy engagement in the Member States as well as a sounding board for EU policymaking, complementing their communication and outreach activities. A permanent two-way communication channel will support the Commission's legitimacy, fostering transparent, constructive relationships with Member States' authorities, stakeholders and citizens and ensure better policy impact, stronger trust, and more effective communication tailored to local contexts.

How? This requires a clear role and structure, with the corresponding capacities, transforming the Representations into agile outposts focused on both communication and policy support, anchored at the heart of the central policy coordination of the Commission, thus enabling them to drive impact where it matters most.

Problem statement

Despite their importance and potential, Commission Representations are often underutilised as strategic actors for policy engagement. Key issues are structural, operational and coordination challenges.

- **Expertise and information disconnect:** Effective policy engagement and communication are grounded on a good understanding of the substance, yet there is often a gap between headquarters' expertise and the Representations' policy knowledge. Representations often lack timely access to critical policy aspects or country-relevant information that DGs have. This forces them to develop expertise reactively when confronted with national stakeholders, rather than being able to anticipate and guide discussions.
 - **For example, the Representations' absence from some of the sectorial dialogues with Member States on the implementation of policies under shared management** limits the effectiveness of Commission actions and messages, and deprives the Representations of insights into existing problems, policy expertise and relevant contacts in the Member States.
 - Hybrid models exist, where attachés support the work of the Representations, such as (i) the Economic Counsellors (ECOs, previously known as European Semester Officers) seconded to SG REFORM, (ii) the Digital Service Act (DSA) attachés from DG CNECT, or (iii) the DG HOME migration experts. They provide good examples to build on.
- **Disconnected strategy:** Representations draw up their annual country strategy for communication and engagement in coordination with

headquarters (DG COMM & policy DGs), but this process is largely separate from country-focused reflections in the DGs.

- **Policy cycle gaps:** Representations are not integrated across the full policy cycle so that opportunities to prepare the ground effectively and provide timely feedback are underused.
- **Corporate versus local communication focus:** The current approach and resource allocation is moving towards more locally tailored engagement, which should be continued. While Representations effectively adapt EU-wide campaigns to local contexts, they need to gradually build capacity to develop communication strategies based on genuine local needs, aiming for more proactive engagement with wider audiences.

Proposed solution

The **Representations can play a crucial role in strengthening trust** of citizens and stakeholders in Member States and there are various avenues to support this role.

2.1. Reinforce the standing of the Representations and amplify policy dialogues

- **Representations should serve more as hands-on ‘embassies’**, combining the function of a sounding board for EU policymaking with that of conduit for engagement about EU policy in the Member States, complementing their communication and outreach activities. It is proposed to adjust the future working methods accordingly.
- **Renaming the offices and the function** was one option we explored to further improve the Representations’ standing in Member States. However, **it is a politically and legally sensitive choice that we do not recommend at this stage**. In reality, their standing in Member States will largely depend on their role and level of influence within the Commission.
- **Representations to establish an effective partnership with the authorities for EU affairs in the Member States**, to exchange on policy priorities, communication and outreach needs and actions, and aim for synergies and complementarity.
- **Amplify policy dialogues throughout the policy cycle** by providing space in Representations and resources for genuine, trust-building debates with stakeholders and citizens – from early consultations and engagement to legislation and implementation – ensuring policies are shaped by and communicated to those most affected. The current system of policy consultation is too static and bureaucratic, and resources could

be used in a more dynamic way with a different approach from headquarters and more involvement of the Representations.

- **Systematically including the Representations in the negotiation and institutionalised dialogue** between headquarters and national administrations **under shared management**, e.g. annual review meetings with managing authorities, monitoring committees with all national stakeholders, negotiations on the plans and their amendments, including future National and Regional Partnership Plans.

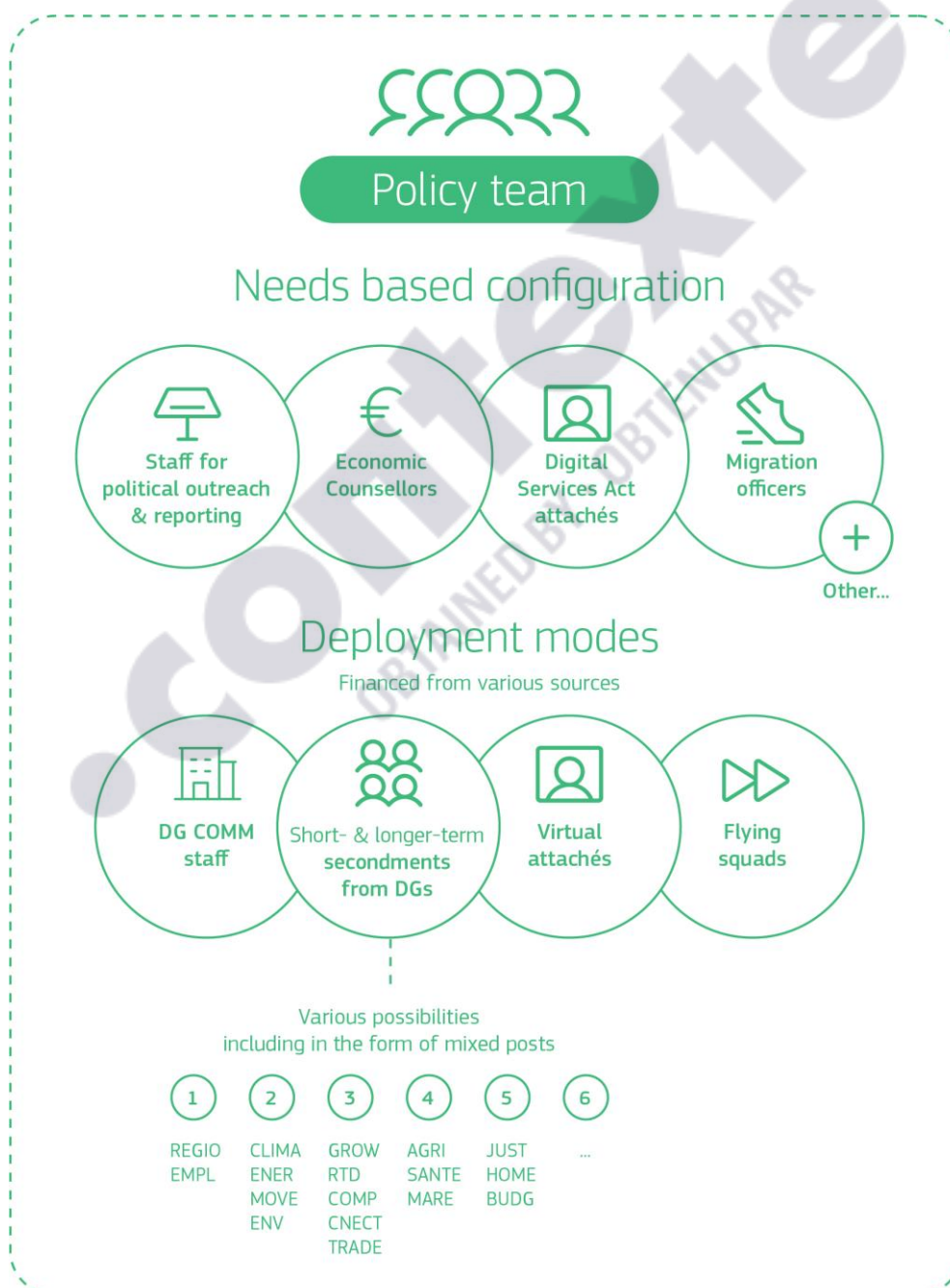
2.2. **Establish policy teams in Representations with a needs-based workforce allocation**

- **Transform the Representations' *political* teams into *policy* teams**, going beyond political reporting, to boost political insights, strengthen monitoring of policy development and implementation on the ground, and **strengthen outreach and stakeholder engagement on the substance of the most pertinent policies in a Member State**. Representations can play a supportive role in negotiations and policy implementation. The transformation into policy teams would also benefit the communication and media teams in the Representations.
- **Undertake needs-based context-specific team configurations** which would make it possible to tailor deployments to Member States' needs, evolving priorities and challenges, e.g. where issues are politically sensitive or subject to broad debate.
- **Use dynamic presence models to enhance capacity and tailor presence to policy needs**. These models could be in the form of:
 - (i) continuous partnership cultivation, e.g. via attachés (including the economic counsellors or Digital Service Act attaché model or mixed-DG posts for families of DGs);
 - (ii) periodic presence and engagement with local stakeholders via virtual attachés based in headquarters who occasionally participate in events and important meetings in the Member States;
 - (iii) providing short-term specialised expertise to address bottlenecks, e.g. in times of crisis or project-based teams ('flying squads').
- **Allocate staff strategically based on key political priorities** and needs in the Member States. This requires senior-level oversight (at director level in the SG, DG COMM, pertinent policy DGs, and DG HR), balancing responsiveness with operational stability and recognising the challenges of frequent rotations while pursuing a needs-based approach.
- **Explore various financing models to increase presence**, e.g. secondments, *mise à disposition*, long-term missions, administrative support from operational programmes, reallocation of posts, and a central

pool to be used depending on political priorities, as recommended in the workstream on 'Unlocking Resources'.

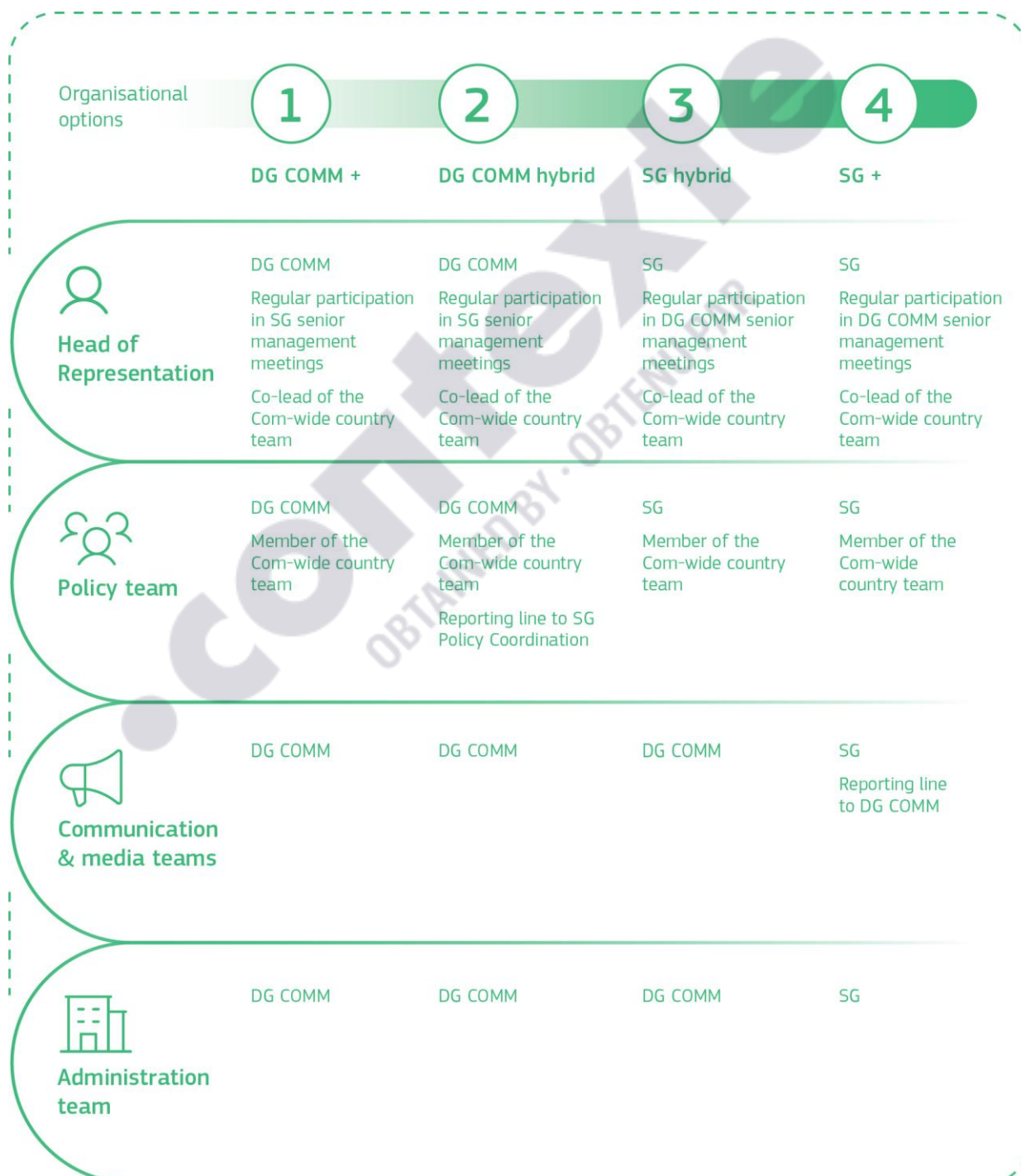
- **Balance interests of headquarters and Representations.** Policy teams should be deeply integrated into both their Representations' and headquarters' operations while maintaining strong cross-Commission connections through Commission-wide country teams. Staff should have relevant experience working at Commission headquarters and preserve institutional ties to headquarters, while ensuring they actively collaborate with the other Representation teams (no isolated entities).

Figure 2 – Typical constitution of a Representation's policy team



- 2.3. **Strengthen the Representations' link to policymaking and coordination**, considering different organisational options for the future. Currently, the Representations are structured in political, media, communication and administration teams and are under the responsibility of DG COMM.

Figure 3 – Strengthening the Representations' link to policy coordination



Implementing these measures would transform Representations into more strategic assets for the Commission's policy engagement with Member States that would boost policy credibility, anticipate national debates better, and foster a genuine two-way dialogue with authorities and stakeholders in Member States.

Recommendation 3: Make working in the Member States more attractive and impactful

Why? The Representations are frontline ambassadors of the Commission, serving as its direct voice, eyes and ears. They engage with citizens, media and national stakeholders on Commission priorities, presenting and explaining the Commission's position. This critical role shapes perceptions of the EU and impacts the Commission's reputation and relationships with Member States. The context in which Representations fulfil this role is becoming increasingly challenging in many Member States.

Furthermore, DGs interacting with national authorities and stakeholders also shape the Commission's reputation and relationship with Member States. They would also benefit from a more structured presence on the ground which helps the success of their policy files and strengthens their country knowledge.

From communicating and supporting priorities such as competitiveness, resilience, green and digital transformations, to countering disinformation and managing crises, **Representations are important for making EU initiatives understandable and impactful.** With **staff who combine policy expertise, diplomatic acumen, local knowledge and communication skills,** the Commission can enhance its influence and credibility. Investing in the right talent of staff (physical or virtual) in Representations is not merely an operational necessity – it is a strategic imperative to safeguard and advance the EU's interests at national level.

Working in EU Representations offers Commission staff invaluable firsthand experience of engaging with local stakeholders and citizens, policy implementation, and political dialogue in a national context. It strengthens skills in communication, diplomacy, and strategic adaptation. National exposure offers a unique perspective on the Commission's actual impact and enhances staff's ability to bridge policy design with practical realities. These are assets that are needed for effective management and senior leadership roles in the Commission.

However, using the mobility option to work in a Representation in a Member States is not sufficiently attractive to staff because it **is often not acknowledged**

in career progression and can come with **financial disadvantages and family-related barriers**.

What? Actions to enhance the attractiveness of working in Representations, including at an early career stage, ensure recognition of mobility in career development, and improve operational efficiency by ensuring the availability of the right set of experience, expertise and skills.

How? This requires:

- career recognition systems that support and reward mobility;
- modernising talent management to match skills with Representation needs and ensure transparent and timely deployments.

The reduced attractiveness of working for the Commission outside of Brussels also applies to other sites, including the site of Luxembourg. This workstream points to the ongoing reflections within the Commission and the recommendations of the workstream on 'Talent Acquisition' on the attractiveness of the Luxembourg site, which seem to go in a similar direction as the recommendations set out in this report for making work in Member States more attractive.

Problem statement

While mobility to Member States or Representations offers valuable experience, it is often perceived as a career brake for the following reasons.

- **Lack of career recognition:** Mobility is not sufficiently rewarded in career progression, particularly for returns to headquarters. Colleagues often fear 'being forgotten' by their DGs.
- **Skill challenges:** Positions in Representations require a combination of communication and language skills, knowledge on EU priorities and policies, and experience with the Member States. In addition, the role of Head of Representation demands exceptional professional competence, the highest ethical standards and a special trust-based relationship with the Commission President to be truly impactful. Finding the right person for the job can be difficult at times.
- **Resources challenge:** There is a tension for policy DGs between using their resources for policy work in headquarters or in a Representation.
- **Financial disadvantages and family barriers:** Adjustment coefficients and loss of expat allowances, coupled with high living costs and family-related concerns, often deter good candidates.

- **Contractual staff career impasse:** 50% of Representation staff are on contracts without many career **advancement possibilities**, which can discourage adaptation and agility.
- **Limited training opportunities:** Staff working in the Representations have less access to training opportunities than staff working at headquarters. This might hamper their professional development and create barriers to career progression.
- **Structural rigidity:** The evolving nature of Commission priorities and organisational structure creates mismatches between existing roles and operational needs. These mismatches are compounded by legal and contractual limitations that constrain role restructuring. Difficulties in recruiting specialised profiles from local labour markets exacerbate staffing challenges.
- **Undervalued country expertise:** Senior management in DGs do not always sufficiently value country-specific expertise and knowledge in resource allocation and career progression, which can lead to underinvesting in their presence in the Member States.

The above-mentioned factors show a **suboptimal landscape for career development and organisational flexibility**.

The Commission's **staff survey** results show that satisfaction with learning and development opportunities is lower in the Representations than in the Commission overall. At the same time, staff in the Representations are much more likely than staff across the Commission to feel that their work makes a difference to the lives of European citizens. Staff input via the **suggestion box** argues that working in a Representation is a highly valuable experience. Some suggest making it a mandatory element of an official's career in the Commission.

Proposed solution

To transform these challenges into opportunities, we propose that the Commission should:

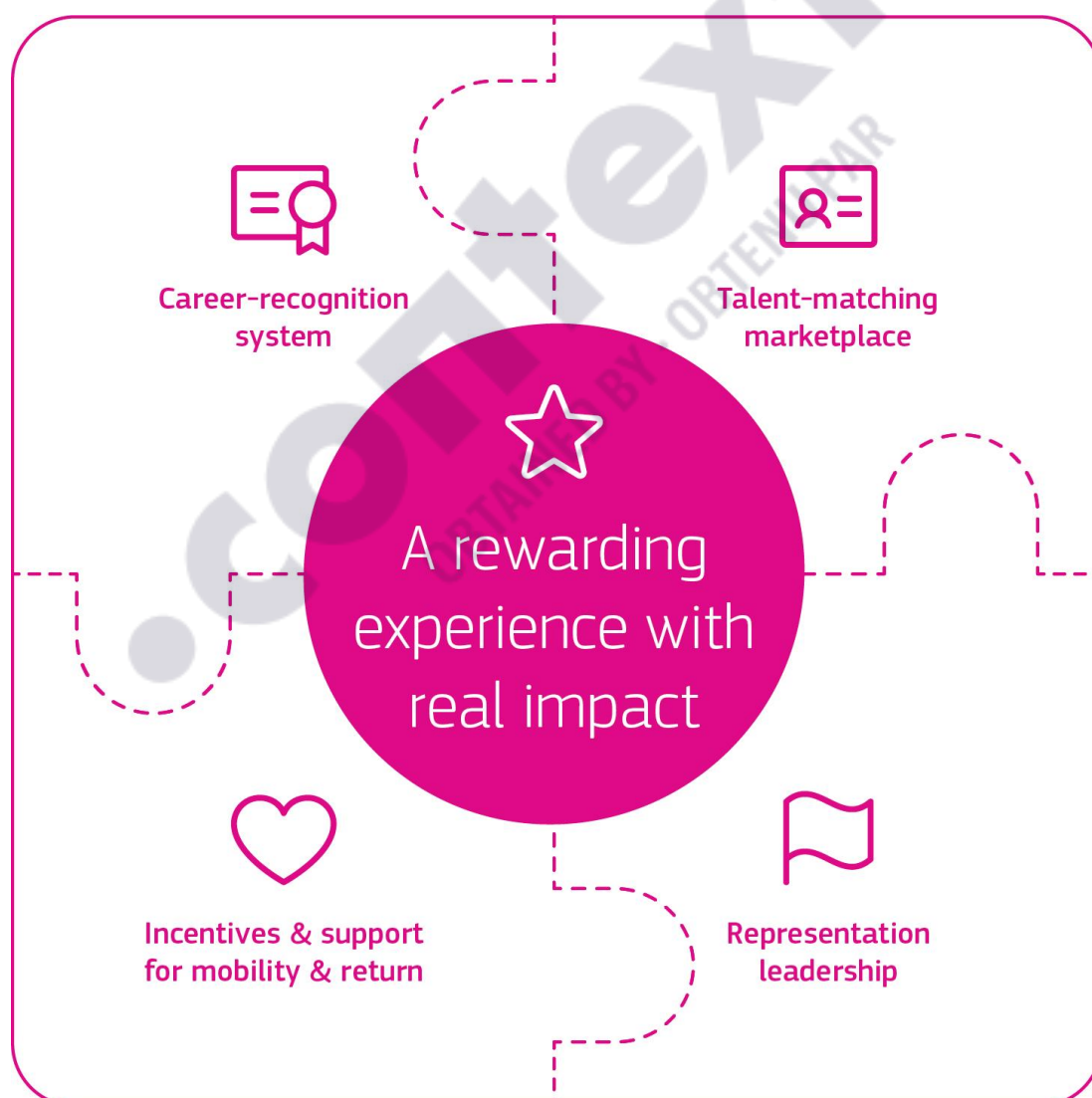
- 3.1. **Adopt a talent strategy for the Representations and support for mobility**
 - **Adopt a talent strategy** for the Representations that mobilises staff from across the Commission and offers **agile career paths** that treat a posting to a Representation as a **genuine asset for progression**. Appointments to (senior) management positions should consider mobility, in particular working at Representations or otherwise in a Member State, as an asset; for particularly senior and sensitive positions even mandatory.

- **Establish a Commission-wide marketplace for talent** with the necessary communication skills and policy expertise, i.e. **a talent pool of officials and contract staff to match skills with needs across Representations**. This would facilitate transparent and timely redeployments. **Cultivate the talent pool** by extending the **Junior Professionals Programme (JPP) to the Representations**. Attracting young talents was an issue raised in the **survey with the Representations**.
 - **Provide central support for career development, mobility and the return to headquarters**, including through **career development/reintegration plans**, training and job shadowing possibilities and a **clear timetable for rotations to start on 1 September**, with a possibility to grant exceptions if needed. Rotation rules should be established for the whole Commission with 5 years as standard period (with only exceptional prolongations in the interest of the service). Policy DGs could opt for shorter secondments.
 - **Consider allocating a dedicated HR officer to the Representation**, particularly for underrepresented Member States, with a double mandate: (1) to serve as contact point for seconded staff and be responsible for career development and reintegration; and (2) to engage in proactive outreach to national and regional ministries, universities and other stakeholders and to promote recruitment and traineeship opportunities in the Commission.
 - **Offer a comprehensive rewards package** to incentivise mobility with financial incentives such as **temporary higher grade levels for Heads and Deputy Heads of Representation**, and **appropriate allowances**, combined with relocation assistance and family support to make postings more attractive.
 - **Make sure appraisals and promotions are jointly handled** by the sending service(s) and the host Representation with a dedicated promotion quota (as currently for Cabinets).
- 3.2. **Strengthen the role and profile of Heads of Representation** by upgrading their position within the Commission. The Heads of Representation should have experience across various policy areas and/or Cabinet experience and should become better integrated into decision-making processes. They should be invited to participate in all high-level visits and meetings with national authorities and stakeholders and have full information about relevant developments regarding the Member States. This would also enhance their standing in the Member States.

- 3.3. **Review contractual staff arrangements**, including **flexibility clauses** to align job profiles with evolving needs, while providing induction programmes and continuous training. Promote mobility **to another Representation and encourage career development** inside of the Commission (e.g. by allowing participation in internal and external competitions) and outside of the Commission (e.g. by establishing links with other EU institutions).

These measures would strengthen the Commission's external presence and are in line with the recommendation of the workstream on 'Careers' to promote mobility and create a more agile, talent-focused organisation.

Figure 4 – Make working in the Member States more attractive and impactful



Recommendation 4: Optimise the engagement ecosystem

Why? To raise the sense of ownership and visibility of EU policies and actions across Member States, we must consider the entire engagement ecosystem, which currently operates in a fragmented way. In addition to the Representations and the direct dialogue with Member States, this recommendation looks at optimising the wide range of outreach channels of the Commission, and its cooperation with other EU institutions and bodies, the Member States and stakeholders.

What? The existing diverse engagement channels such as networks, agencies and implementing partners present opportunities and potential efficiency gains. Given evolving priorities and resource constraints, we need to assess their value, impact and effectiveness to determine how they can better support the Commission's presence in Member States.

Furthermore, fostering a stronger relationship with Member States' public authorities can create the necessary bonds and a sense of belonging to the same European public service ecosystem. Increasing secondments of Commission staff to Member States public authorities could provide strategic benefits for both the Commission and receiving authority. Last but not least, promoting citizens' education about and engagement with the EU would help the Commission foster active participation and critical debates, and build lasting connections with the people we serve.

How? This requires:

1. reviewing, connecting and optimising the diverse engagement channels;
2. deepening relationships with Member States' public authorities through more structured, agile, short-term exchange programmes and joint activities;
3. reconnecting with schools and the public.

Problem statement

The Commission's outreach and local presence remain uneven and under-exploited for several reasons.

- **Fragmented information network ecosystem.** For example, at present there is no complete overview or systematic assessment of '[EU centres](#)' (Commission-related information networks that provide advice and services on different EU programmes or issues) across the Member States and regions. This fragmentation makes it difficult to evaluate their added value, efficiency and outreach impact. While some networks operate

effectively, others lack visibility, coordination, or impact orientation. Successful practices like the EU CAP network are not adequately shared across policy areas or known by Representations.

- **Unexplored potential for collaboration with decentralised agencies** in host Member States to support the Commission's broader presence beyond their strict mandates.
- **Limitations on staff exchange with Member State authorities** (such as rigid rules on secondments and lack of reciprocal exchange opportunities) and under-use of experience obtained outside the Commission. Apart from frequent secondments to EU Council presidencies, external mobility of Commission staff to Member State public authorities in the interest of the service is rare.
- **Patchy EU education and public awareness about the EU and the Commission.** A [Eurobarometer \(Special 568\) survey](#) revealed that 78% of EU citizens are unfamiliar with EU tools for direct involvement in decision-making processes in the EU, and 34% want more local debates on EU matters.
- The input from staff received via the **suggestion box** includes proposals for more opportunities for secondment and **staff exchanges** (e.g. a reverse seconded national expert system) and **strengthened communication and staff engagement schemes**, e.g. by having more projects like 'Back to School'.

Proposed solution

To achieve a more coherent and visible presence of the Commission in the Member States we propose the following:

- 4.1. **Streamline outreach** (with Commission-related actors present physically in the Member States as well as with trained Commission colleagues)
 - **Comprehensively review and coordinate all Commission information related networks ('EU centres')** in Member States, assessing their legal foundations, alignment with priorities and the evolving Commission structure (where networks are frequently tied to individual DGs) and overall impact. The review should identify good practices (e.g. EU CAP networks), streamline channels and operations, and improve coordination with DG COMM outreach activities, i.e. to join forces with the Europe Direct Centres and the Representations' local outreach, while better connecting networks to the Commission-wide country teams (e.g. via the Representations).
 - **Enhance regional and local outreach in key policy discussions**, both via selected internal and external actors (e.g. experts, influencers, alumni).

Within the Commission, establish a dedicated **pool of trained colleagues** to participate on behalf of the Commission in debates on EU policy matters of interest for citizens. One example of a good practice is the ‘CAP Ambassadors’ initiative in DG AGRI, where senior or middle managers present policy matters directly to national audiences and work with Representations, national ministries and stakeholders. This enhanced outreach initiative should be coordinated through the Commission-wide country teams and **given a dedicated mission budget**. **Senior management should be empowered to present** major policy initiatives directly to national audiences **in local media, podcasts, videos, social media**, and crucially, in national languages.

- **Strengthen cooperation with other Commission sites in Member States** that have a local impact linked to their implantation like the JRC. Given its broad profile, the JRC covers many areas linked to European policies and could be used for more joint outreach together with policy DGs.
- **Engage strategically with other EU institutions and bodies.** Encourage **decentralised agencies** in host Member States to contribute to the EU’s visibility and policy impact through collaboration with Representations and regional offices, subject to the more strategic review of agencies as recommended by the workstream on ‘Agencies and Offices’. Central services should oversee this cooperation and assess the allocation of resources to this broader ecosystem, identifying possible efficiency gains or needs for reinforcements. Expand the cooperation with the **European Parliament liaison offices** to amplify policy dialogues in Member States (see recommendation 2.1).

4.2. **Deepen staff cooperation with Member States’ authorities through more structured, agile, short-term exchange programmes and joint activities**

- **Expand and diversify staff exchange programmes**, both structured and ad hoc, promoting respective working methods and culture.
- **Establish flexible rules for secondments (from Member States to Commission and from Commission to Member States)** and introduce short-term opportunities like internships. A **reverse seconded national expert programme** could be a pathway for EU officials to work in Member State public authorities.
- **Transform the ‘national experts in professional training programme’ into a two-way exchange**, complemented by traineeship exchanges that offer similar professional development opportunities.
- **Establish regular reciprocal study visits and joint workshops** between Commission staff and national legislators or civil servants.

Support **vocational EU training programmes** tailored to national and regional officials and contract staff in parliaments and civil service bodies, leveraging national training centres, ensuring they are equipped with the latest EU legislative procedures, impact assessment tools and digital governance skills.

- **Create alumni networks** of national experts in professional training and seconded national experts to serve as mentors, facilitators, and knowledge brokers.

4.3. **Reconnecting with schools and the public**

- Encourage Member States to integrate education about the EU into national school curricula and provide dedicated training for teachers.
- Expand schemes for educators to visit Brussels.
- Map and coordinate existing education programmes across DGs to leverage teachers for critical debates on EU affairs, including DG COMM's Europe Direct Centres, DG REGIO's 'EU in my school', and DG EAC's teacher database.
- Re-invigorate and promote the 'Back to School / Back to University' programme across all Commission services.
- Increase Commission staff visits to local communities (e.g. towns in the 'EU Local Councillor' network) and participation in fairs.

For those last two actions, provide standardised tools and narratives from headquarters and Representations as support. Offer extra teleworking days from abroad as an incentive to boost participation, merging civic outreach with flexible working benefits. Promote visibility for these initiatives.

By integrating these measures, the Commission will create a more unified, visible and impactful network that links its headquarters, the Representations and national and regional authorities, ultimately strengthening a European public service ecosystem and the EU's policy reach across the Member States.

Implementation

No.	Recommendation	Who	Timeline
1	Strategic country expertise and engagement: a new way of working together		
1.1.	Strategically steer country expertise and engagement for each of our Member States (with Commission-wide country teams)	SG, DG COMM, all DGs	Short-term (January 2027)
1.2.	Set up a single country analysis cell and platform	SG	Mid-term
1.3.	Regularly review relations with Member States at the political level and strategic upfront engagement with counterparts in the Member States	SG, Heads of Representation	Short-term (also based on 1.2./ mid-term)
2	Upgrade the Commission Representations for better policymaking and outreach		
2.1.	Reinforce the standing of the Representations and amplify policy dialogues	DG COMM, SG	Short- to mid-term
2.2.	Establish policy teams in Representations with a needs-based workforce allocation	DG COMM, SG, DG HR, policy DGs	Short- to mid-term
2.3.	Strengthen the Representation's link to policymaking and coordination	SG	Short-/mid-term (depending on the option chosen)
3	Make working in the Member States more attractive and impactful		
3.1.	Adopt a talent strategy for the Representations and support for mobility	DG HR, DG BUDG, DG COMM	Short-term
3.2.	Strengthen the role and profile of Heads of Representation	DG HR/DG COMM/SG	Short-term
3.3.	Review contractual staff arrangements	DG HR, DG COMM	Short-term
4	Optimise the engagement ecosystem		
4.1.	Streamline outreach (with Commission-related actors present physically in the Member States and with trained Commission colleagues)	DG COMM	Short- to medium-term
4.2.	Deepen staff cooperation with Member States' authorities through more structured, agile, short-term exchange programmes and joint activities	DG HR	Short- to medium-term
4.3.	Reconnect with schools and the public	DG COMM, DG EAC, DG REGIO, DG HR	Short- to medium-term

Executive summary Innovation and AI

Problem statement

The European Commission faces a transformation that is no longer optional. It is existential. Artificial intelligence is already reshaping how institutions operate, how policy is made, and how citizens interact with public authorities. And AI is only the beginning: breakthroughs in robotics, quantum computing, or other technologies yet unforeseen may arrive before the Commission has finished adapting to the current wave.

The Commission requires agility to treat volatility as the new normal, efficiency through complexity reduction and cost optimisation, and attractiveness as a modern, innovative employer competing for talent. Yet the Commission is not keeping pace. Few staff are proficient in AI. The institution's data remains fragmented across silos. Innovation ranks last among leadership values. Internal AI tools do not yet match the best available alternatives, which may drive staff towards unsanctioned external services. Meanwhile, organisations and citizens increasingly use AI to interact with the Commission, generating more workload than current capacity can absorb.

Incremental change will not close a gap that continues to widen. The question is not whether the Commission will be transformed by AI and other innovations with disruptive potential that may follow. The question is whether the Commission will lead that transformation or be overtaken by it.

Recommendations

To achieve this transformation, our workstream makes five recommendations organised around three strategic horizons – **Survive**, **Drive**, and **Thrive** – with one conviction at their core: technology empowers people, it does not replace them. Every staff member remains at the centre: more empowered, more capable, and more valued.

Survive: securing the essential foundations

1. Create a Single Market for Data

The Commission sits on vast, multilingual data spanning many fields. Yet this unique treasure is locked in silos, largely inaccessible to staff and the AI systems that could multiply its value. A sovereign, federated data environment – where trusted data flows seamlessly under common rules – is the foundation upon which every other recommendation depends, and an advantage that can be extended to Member States and used to galvanise an EU AI ecosystem.

2. Develop an AI-augmented workforce

The flood of AI-enhanced work arriving at the Commission will not wait. Every staff member should gain a personal AI Helper: a force multiplier that supports them and connects with other Helpers across the organisation. Staff mastery of AI demands a continuous 'brain gym' woven into daily work, one that avoids cognitive atrophy. A clear accountability framework ensures every person remains responsible for the work their AI produces.

Drive: shaping the future rather than merely reacting to it

3. Shape the ecosystem

The Commission is simultaneously a political authority, the author of the AI Act, and a large public-sector buyer. No other institution combines these levers. They should be used deliberately to stimulate a European innovation ecosystem, starting with AI but designed to embrace future technologies with disruptive potential. This would uphold EU values and reduce dependency on non-European providers.

4. Operate an innovation engine

The Commission's innovation efforts are scattered and shaped more by individual energy than shared direction. A transformational leader with institution-wide authority and a political mandate should lead a central Innovation & AI Hub that builds, delivers, and scales. Innovation Cells embedded in every Directorate-General would connect to this Hub, to scan the horizon, experiment, scale what works, and stop what does not. This would ensure that, instead of being a side project, innovation is systemic and continuous.

Thrive: building the institution the European Union will need

5. Pioneer the Commission of tomorrow

Transformation programmes are often diluted by the institution that adopts them. For each new policy task, we should take the opportunity to design from scratch for the future. Tasked with a real policy mandate and staffed by a dedicated team, a ring-fenced, AI-native operating environment should run in parallel to the established model. It is not a one-time experiment but the Commission's built-in adaptation system: a permanent mechanism that tests, learns, and feeds proven innovations back into the institution.

Five recommendations. Three horizons. One transformation. The opportunity is here. The window is closing. The only question left is whether we seize it – together, now – or explain later why we did not.

Recommendations on innovation and AI

The European Commission has committed to ensuring that Europe can draw on a modern, efficient public administration to deliver on its political priorities and make a difference for Europeans in their everyday lives. To this end, the Commission requires a true, deep transformation driven by three strategic imperatives: agility to navigate volatility as a normalised condition, efficiency through complexity reduction and cost optimisation, and attractiveness as a modern, innovative employer competing for talent.

The existential transformation the Commission needs is made even more pressing as artificial intelligence reshapes how institutions operate, how policy is made, and how people interact with public authorities.

The Commission's challenge is not primarily technological. It is cultural. Risk appetite must grow. Safe spaces for experimentation are non-negotiable: failure must be treated as a learning catalyst, not a career penalty. It is also highly likely that AI will stop some activities, enrich others, and create entirely new ones, thus demanding genuine job redesign across the institution.

Leaders at all levels should create and nurture the conditions necessary for this urgent transformation. They should be ready to disrupt the way they work, define clear objectives, foster creativity, and give teams the space to experiment and fail safely – rebalancing incentives to reward experimentation at least as much as compliance – while scaling what works. They should take personal responsibility for driving change. To put it clearly, we need leaders that are visionary change agents.

This is not a burden. This is a golden opportunity. Perhaps the last one that arrives before the gap between the Commission and the pace of change becomes too wide to bridge.

Our goal is clear: transform the Commission into a more efficient, responsive and innovative human-centric digital administration by harnessing AI and establishing an innovation ecosystem with a built-in adaptation system. A Commission that delivers on political priorities and creates tangible benefits for EU citizens.

In this vision, technology serves people. Not the other way around. Every staff member remains at the centre: more empowered, more capable, and more valued, not replaced. Human collaboration, collective intelligence, and social bonds are strengthened, not eroded. Because the institution's greatest asset has

always been the judgment, creativity, and commitment of its people working together.

To achieve this, our workstream makes five recommendations, organised around three strategic horizons: **Survive**, **Drive**, and **Thrive**. These recommendations are detailed in the sections that follow.

Under Survive, we propose creating a Single Market for Data and developing an AI-Augmented Workforce. Under Drive, we set out how to Shape the Ecosystem and [Operate an Innovation Engine](#). Under Thrive, we propose Pioneering the Commission of Tomorrow through a ring-fenced AI-native operational environment.

These horizons are interdependent. Survive without Drive and Thrive merely delays the inevitable. An institution that secures the foundations it needs but fails to quickly build on them will struggle in the world to come.

The Commission has guided Europe through many changes. Now it must undergo its own. Not because technology demands it, but because the Europeans we serve deserve an institution that is as fast, as smart, and as bold as the challenges it faces. An institution that remains human-centric, that is agentic and adaptive by design, where AI systems serve as force multipliers for staff, where innovation is continuous, and where the capacity to change is built into the way we operate.

Recommendation 1: Create a Single Market for data

Data is the fuel of institutional intelligence. Without high-quality, connected, accessible data, even the most powerful AI systems deliver little value. The Commission's data estate – multilingual, cross-sectoral, spanning the breadth of European public policy – is likely unmatched by any other institution in the world. Yet this estate remains locked in silos, rarely visible to those who need it, and largely inaccessible to staff and the AI systems that could unlock its full potential.

The Commission must create a **Single Market for data**: a sovereign, federated environment where trusted data flows seamlessly and securely across organisational boundaries, making it discoverable and usable by both staff and AI systems. **This is the foundation upon which every other recommendation in this report depends.** It is also a **key advantage**. Once the Single Market for Data is established, it can be extended to Member States and used to galvanise an EU AI ecosystem, giving EU-based solutions an edge that no external provider would be able to replicate.

Problem statement

The Commission has established a data governance framework and taken real steps to promote reuse. Despite these efforts, much of its data remains **fragmented** across systems and organisational silos. Valuable information exists, but it does not move easily across the institution, significantly constraining the Commission's ability to exploit one of its most important resources.

This fragmentation is not new. But **the emergence of AI has turned what was once an operational inconvenience into a strategic liability**. Siloed data reduces the effectiveness of analysis and slows decision-making. It also limits the Commission's ability to benefit from AI systems, which depend on high-quality, interconnected, and interoperable data to discover connections across data sources and deliver relevant knowledge when and where it is needed.

But AI systems can only do so if they have trusted, well-governed data to work with. **Without the data foundation, the technology that promises transformation will simply reproduce the fragmentation it was meant to overcome.**

To put it simply, an institution that cannot mobilise its own knowledge in the AI era will be outpaced by those that can.

Proposed solution

A three-layer architecture

The Commission must build a Single Market for Data within the institution: an environment where data moves seamlessly and securely under common rules, shared standards, strong security safeguards, and clear responsibilities. Sensitive and confidential data remains accessible only to authorised users and AI systems. All other data is freely accessible by default. The guiding principle is simple: **know what we have, make it findable, and let authorised users and AI systems tap into it wherever it sits.**

The Single Market for Data rests on three layers: a **sovereign infrastructure** for secure data storage and control; a **federated system** that keeps data within the responsible services while enabling interoperability across the institution; and a **discovery layer** that makes data easily searchable and reusable. Common standards and interoperable formats must be enforced to ensure that data is consistent, reusable, and AI-ready across all services.

A fictitious illustration: What the Single Market for data makes possible

DG ENER holds granular data on energy infrastructure investments, DG MOVE tracks cross-border transport flows, DG CLIMA monitors emissions by sector, and Eurostat maintains regional economic indicators. Each dataset sits in its own system, governed by its own conventions. A policy officer preparing a briefing on the green transition's impact on industrial corridors must request data from four services separately, reconcile incompatible formats, and assemble the picture manually: a process that takes weeks and often produces an incomplete result.

With the Single Market for data, a single query – issued by the policy officer or by an AI agent acting on their behalf – retrieves and cross-references all four sources in minutes, surfacing patterns no single dataset could reveal. For instance, that regions with the highest transport-energy dependency are also those where industrial employment is most vulnerable to decarbonisation. The briefing is sharper, faster, and grounded in evidence that was always there but never fully connected.

Governance

An improved, clearer governance framework than the current one is essential. A **Central Authority** – a role that could be assumed by the Innovator-General proposed under the recommendation to Operate an [Innovation Engine](#) – should have the mandate to steer this transformation institution-wide.

At the level of each Directorate-General, existing Local Data Correspondent roles should be upgraded to **Chief Data Officers**, responsible for ensuring data quality, completeness, correctness, and timeliness within their service, in close cooperation with local data owners and data stewards.

Clear roles, responsibilities, and lines of collaboration between the Central Authority and the Chief Data Officers should be defined from the outset. Accountability for data quality remains with each Directorate-General for the data it produces. Governance should be lean, without unnecessary layers, with trust, security, and compliance at its core.

Data agents: AI in service of data governance

Building and maintaining a Single Market for Data across the entire Commission is too large and too dynamic a task to rest on human effort alone.

Data agents – AI systems operating under human oversight – should be deployed to support Chief Data Officers and data stewards in their daily work. These agents could continuously scan, classify, and tag data assets; detect gaps, inconsistencies, and quality issues; suggest metadata enrichments; and flag data that is stale, duplicated, or misaligned with institutional standards.

While leaving involved staff ultimately accountable, the data agents would operate as tireless assistants that keep the data estate current and trustworthy, freeing human data professionals to focus on governance decisions, policy judgment, and stakeholder engagement: work that requires distinct human skills.

Over time, these data agents can be linked into data ‘assembly lines’ (also known as **agentic workflows**) – where one agent ingests new data, another classifies it, the one following it in the ‘chain’ checks its quality, then another one cross-references it against existing records – running continuously with minimal human intervention and escalating to human decision-makers only when exceptions arise. This is not automation for its own sake. It is the most realistic way to govern a data estate of the Commission’s scale and complexity at the speed the AI era demands.

Incentives and culture

Technology and governance alone will not build a Single Market for Data. A **culture of responsibility and sharing** should take root, in which every staff member recognises data as a shared institutional asset. Not a resource to be hoarded or an administrative burden to be avoided.

To make this real, incentives must match the behaviour the institution needs. Contributions to data quality and sharing should **become the norm**, and feeding the Single Market for Data should be visibly valued, not silently expected. Services that make their data discoverable and reusable should be **publicly acknowledged**.

Chief Data Officers must have the seniority, resources, and institutional backing to fulfil their role effectively. The Commission should also invest in **data literacy** across all staff – not only specialised technical expertise, but a practical understanding of data quality, limitations, ethical considerations, and responsible use – so that contributing to and benefiting from the Single Market for Data becomes second nature.

The Union’s sovereign advantage

The Single Market for Data should first unlock the value of the Commission’s own institutional data. Once proven, it can be **carefully extended to Member States and the broader European AI ecosystem**, creating a shared, sovereign data space of a scale and quality that no single Member State or private AI provider could assemble alone.

This is where the Single Market for Data becomes more than an internal efficiency measure. It becomes a **sovereign advantage for the European Union**: a curated, multilingual, policy-rich data foundation that gives EU-based AI solutions

privileged access to the kind of high-quality, domain-specific data on which superior AI models are built.

Non-EU providers, however well-resourced, would not be able to replicate this asset because it is born of the Commission's unique role at the intersection of regulation, policy, and public administration across 27 Member States.

By making this data available to European AI developers under carefully designed conditions, the Commission can fuel an ecosystem of sovereign AI solutions built not merely in compliance with European values, but on European knowledge. This would strengthen cooperation and reinforce strategic alignment with Member States, positioning the Commission not as a passive consumer of AI but as the architect of the data foundation on which European AI stands.

What failure looks like

Without a Single Market for Data, the consequences are stark.

First, the Commission risks **irrelevance**: in a world where decisions should be fast, integrated, and evidence-based, an institution that cannot quickly mobilise its own knowledge will fall behind.

Second, it would **waste time and capacity on inefficiency**: staff will keep searching for information, duplicating analyses, and navigating disconnected systems instead of focusing on more important work.

Third, without a sovereign data infrastructure capable of fuelling EU-based AI systems with a genuine strategic edge, the Commission would grow **dependent** on technological solutions developed elsewhere, forfeiting the very strategic autonomy it advocates for the European Union.

The Single Market for Data is also a critical enabler for the innovation testing and development envisaged under the recommendations to [Operate an Innovation Engine](#) and to [Pioneer the Commission of Tomorrow](#). Without it, those ambitions lack their most essential raw material.

Recommendation 2: Develop an AI-augmented workforce

The Commission's most valuable asset is its people. Yet too much of their time is consumed by administrative tasks that machines could handle better and faster, thereby freeing staff to pursue meaningful work that utilises their expertise, creativity and critical thinking.

Meanwhile, a rising tide of AI-enhanced demands – from grant applications to complaints to correspondence – threatens to overwhelm an institution whose

staffing levels remain largely constrained while its responsibilities increase. The Commission thus needs to transform to one where every member of staff is equipped with the skills, the tools, and the confidence to work alongside AI as a force multiplier, while remaining firmly in command of the decisions that matter.

This recommendation sets out how to build that AI-augmented workforce. **It rests on three pillars:** a new approach to skills development that is continuous, personalised, and embedded in daily work; a personal AI Helper for every staff member, drawing on the institution's [Single Market for Data](#); and a clear accountability framework in which humans remain responsible for every output their AI produces. **Together, these pillars would transform the Commission into a hybrid, human-centric institution:** one that is not only more productive, but genuinely attractive as a modern, cutting-edge employer.

Problem statement

The Commission operates in an increasingly volatile, uncertain, and complex policy environment that demands fast reaction and new initiatives. Workload is rising. Staffing, largely, is not. The years ahead will highly likely demand even more integrated and flexible ways of working. And **the pressure is compounding from the outside:** organisations and citizens across the European Union are already using AI to generate more grant applications, more procurement bids, more complaints, and more correspondence than ever before, at a pace that would only intensify as AI agents become commonplace.

Yet **the Commission is not keeping pace.** Few staff are proficient in using AI in their daily work. In the most recent staff survey, innovation ranked last among leadership values. The existing conventional training approaches – periodic courses delivered through platforms such as EU Learn – will not suffice. AI changes too fast, and the skills it demands – including the safe and responsible use of AI – are too varied and too deeply embedded in daily practice to be addressed through scheduled instruction alone.

Moreover, current internal AI tools, while a commendable early step, do not yet match the capability of the best external alternatives. This makes the unsanctioned services appealing.

Furthermore, the institution is too often perceived as slow and bureaucratic, and **it struggles to attract the talent it needs** for AI and the innovations with a disruptive potential that may come next.

Finally, the very use of AI carries a subtle risk: over-reliance can erode the critical thinking, analytical depth, and hands-on knowledge that make human judgment irreplaceable. If the Commission equips its staff with powerful AI tools without

simultaneously strengthening their independent capabilities, **it risks trading one vulnerability for another: swapping information overload for cognitive atrophy.**

Proposed solution

Skills: a brain gym, not a classroom

Every member of staff must develop a solid understanding of AI: how to prompt it effectively, how to evaluate its outputs critically, and how to recognise its limitations and risks. As many as possible should become AI literate if not experts. And while the existing conventional training programme is a good start, the path to AI mastery is something fundamentally different: **a continuous, AI-supported ‘brain gym’ woven into the fabric of daily work.**

The brain gym would be **powered by AI Helpers**, intelligent assistants assigned to each staff member, with access to institutional knowledge and the ability to learn from daily work. Their design is set out in the next section, but their role here would be straightforward.

The brain gym’s first and most urgent purpose is to build AI mastery itself. Each AI Helper would coach the staff member it supports in the context of real tasks – correcting a weak prompt in the moment, questioning an output accepted too quickly, flagging a risk the staff member overlooked – and progressively unlocking greater efficiency and quality. This is how AI proficiency stops being a classroom exercise and becomes a working reflex.

Its second purpose emerges as mastery deepens. The more proficient staff become, the more work AI absorbs, and the greater the risk that critical human faculties dull through disuse. The brain gym would guard against this **cognitive atrophy** by delivering personalised micro-challenges: a data interpretation exercise before a meeting, a drafting task that forces manual reasoning, a prompt that asks ‘What would you decide if I was unavailable?’

This is not training as an event. It is **training as a discipline: continuous, adaptive, and inseparable from the work itself.** Testing and certification milestones would ensure that progress is measurable and recognised.

For leaders, the stakes are higher still. Managers at all levels should understand AI’s transformative potential, actively embrace new ways of working, and foster a culture where their teams are empowered to experiment and learn. AI boot camps should be mandatory for all managers, with personalised coaching for top managers, covering not only AI competencies but change leadership: how

to champion experimentation, manage transformation, and create environments where staff can innovate without fear of career penalty.

For leaders, the ambition is not merely AI literacy. It is to make them confident, critical, and creative in their engagement with AI: leaders that can rethink jobs with their teams, reinvent processes, and inspire others to do the same.

Recruitment should evolve in parallel. Open competitions, selection procedures, and interviews should incorporate digital, innovation, and AI skills for all profiles, including practical tests. Secondment and intrapreneur schemes – as set out in the [recommendation on shaping the ecosystem](#) – should bring fresh AI expertise into the institution while immersing Commission staff in cutting-edge environments.

AI Helpers: a force multiplier for every staff member

Today's GPT@EC is a good starting point, but it lacks contextual knowledge, institutional memory, and the personalised capability of a true AI assistant. We propose taking this initiative much further.

Each member of staff should be equipped with a personal AI Helper, operating within a human-centred hybrid organisation served by both people and AI.

Drawing on [the Single Market for Data](#), each AI Helper would have access to the same institutional knowledge available to staff, and would become, overtime, better at boosting the specific expertise and working patterns of the person it supports. This would occur in two ways: explicitly, through instructions and documents provided by the staff member; and implicitly, by working alongside them, helping them in the meetings they participate in, and collaborating with them to improve the messages and documents they produce.

AI Helpers would connect with one another, sharing information and collaborating across the organisation on behalf of the staff they serve. They would have agentic capabilities: the ability to take actions and decisions within clearly defined boundaries. They would serve as knowledge repositories, research assistants, and operational support tools. And their deep integration into the Commission's data, systems, and workflows would give them a level of institutional entrenchment that no external tool can replicate: making them the natural, trusted first choice for every task.

This combination of attributes would transform the way we work. Staff would spend less time searching for information, repeating analyses, and navigating disconnected systems, and more time on what only humans can do: exercising

judgment, building relationships, designing strategy, and engaging face to face with stakeholders and citizens.

The Commission would thus gain the capacity it needs to respond to rising demands without drastic increases in staffing. And it would become, visibly and credibly, an innovative employer capable of attracting the best talent in Europe.

Accountability: humans in command

To realise the full potential of AI Helpers while ensuring ethical and responsible use, a clear accountability framework is essential.

Each AI Helper should be registered with a unique identity in a Sysper-like dedicated system, monitored throughout its lifecycle from creation to decommissioning. Operational ‘contracts’ should define each Helper’s boundaries, responsibilities, reporting obligations, and traceability requirements. When a Helper is reassigned or decommissioned, its accumulated knowledge should be harvested and preserved for institutional use.

A clear framework for human-AI collaboration should be established and designed to evolve over time. Some tasks may be fully delegated to AI; others would be performed by AI under human supervision; still others would remain exclusively human or would be performed by humans with AI support. In all cases, one principle is absolute: **every member of staff remains responsible for the work their AI Helper produces**, and can and must intervene when outputs are inaccurate, incomplete, or misaligned with policy intent.

Questions around the governance of human-AI interactions, the status of data generated by AI agents, and the boundaries of delegated authority would need to be addressed as the technology and its uses mature, [in close coordination with the Innovator-General and the Innovation Engine](#).

A fictitious illustration: An AI Helper in action – preparing a cross-cutting policy initiative

A policy officer in DG CLIMA is tasked with drafting a communication on climate adaptation in urban areas. They ask their AI Helper to survey the institutional landscape. Within minutes, the Helper – drawing on the Single Market for Data – identifies relevant research from the JRC on heat island effects, ongoing pilot projects tracked by DG REGIO, recent Eurostat data on urban population trends, and a forthcoming legislative proposal in DG ENV with potential overlaps.

The policy officer's AI Helper contacts the Helpers of colleagues in those DGs, flagging the initiative and requesting relevant briefing materials. Two Helpers respond with synthesised summaries; a third schedules an in-person meeting with the colleague they serve, as they deem a human-to-human discussion crucial in this case.

Meanwhile, the policy officer's AI Helper nudges them: 'The JRC data suggests a different trend from the Eurostat baseline. Before you rely on the AI's reconciliation, can you identify the methodological difference yourself?' The officer pauses, reviews the sources, and spots a divergence in reference periods, then corrects the framing.

The result: a richer, faster, and better-informed draft, with the human firmly in command of the judgment calls, and the AI handling the institutional legwork that would otherwise have taken weeks of emails, searches, and inter-service coordination.

Future workforce: augmented, not diminished

Human-AI collaboration would reshape the Commission's workforce. The capacity of each staff member would be augmented by AI, enabling the institution to respond to future policy challenges and workload increases without significant growth in headcount.

Empathy, adaptability, curiosity, critical thinking, and digital expertise would become even more important. AI would absorb many repetitive and time-consuming tasks but not all of them. Some routine activities serve a purpose beyond their immediate output: they build institutional knowledge, maintain essential skills, and provide the cognitive grounding that keeps human judgment sharp. The Commission should be deliberate about which tasks its staff delegate to AI and which they retain, ensuring that augmentation does not quietly hollow out the expertise it is meant to amplify.

Far more time should be devoted to face-to-face strategy development, stakeholder engagement, and the creative work that defines the Commission's unique value. Further reflection is needed on what this evolution means for different job profiles and function groups, work that falls naturally within the mandate of the Innovator-General and the Innovation Engine.

Without [the Single Market for Data](#), the [AI-Augmented Workforce](#) has nothing to draw on. Without the AI-Augmented Workforce, the Single Market for Data remains an untapped reserve. Together, they form **the essential survival kit for a Commission that intends not merely to endure the AI era, but to lead it.**

Recommendation 3: Shape the ecosystem

The Commission is not just any organisation adopting AI. It is simultaneously a political authority, the author of the world's most comprehensive AI legislation, and a large public-sector buyer.

No other institution combines regulatory power, legislative authority, and procurement leverage in the same way. These levers should not lie idle. They should be used deliberately – through procurement standards, strategic data sharing, and structured partnerships – to stimulate a European innovation ecosystem – starting with AI but designed to embrace future technologies with disruptive potential – that upholds EU values and standards, reduces dependency on non-European providers, and produces solutions that are sovereign, innovative, multilingual, cyber resilient, explainable, and aligned with the way EU entities and administrations actually work.

This recommendation provides the essential external dimension of the Commission's transformation. [The Single Market for Data](#) supplies the raw material. [The AI-augmented workforce](#) creates the demand. But **without an EU supply side capable of meeting that demand, the Commission – and the European Union – will remain dependent on technologies designed elsewhere, for other purposes, under other rules.**

Problem statement

The Commission remains heavily dependent on non-European providers for its most capable AI solutions. This dependency carries **three compounding risks**: a **strategic autonomy deficit**, as critical institutional capabilities come to rest on systems the Commission neither fully controls nor fully understands; **vendor lock-in**, as switching costs rise with every year of deepening integration; and **data sovereignty concerns**, as institutional data – including sensitive policy deliberations – may flow through infrastructure governed by non-EU jurisdictions.

These risks are acute for AI today. They will recur – potentially with greater force – as each successive technology with disruptive potential matures: quantum computing, advanced robotics, or innovations not yet foreseen. An ecosystem shaped only for the current wave will leave the Commission exposed to the next.

These risks will not be resolved through better internal governance alone. The supply should follow the demand. The Union's AI ecosystem, while rich in research talent and technical capability, struggles to produce enterprise-grade solutions competitive with those of established non-EU providers. The market signal is too weak, the demand too fragmented, and the incentives too diffuse. Procurement remains largely fragmented across Member States, institutions, and

agencies, diluting the collective purchasing power that could pull EU providers towards the scale and quality the public sector requires.

The Commission is uniquely positioned to break this cycle. With close to €5 billion procured in 2024, it is a large public-sector buyer. It has authored the AI Act. It shapes the regulatory environment in which every provider, European or otherwise, must operate. And through [the Single Market for Data](#), it would build a sovereign data foundation that no external provider would be able to replicate. **The question is whether it would use these levers with strategic intent or continue to purchase AI as a commodity, one contract at a time.**

Moreover, the Commission is not alone in facing these challenges. Most of the Union's public administrations confront the same sovereignty-versus-capability trade-off. Unfortunately, **we are missing a coordinated approach** – pooling demand, sharing standards, exchanging lessons – **that would amplify the impact far beyond what any single institution can achieve.**

Proposed solution

The Commission should **move from passive consumer to active architect of an EU innovation ecosystem**: one that addresses AI as one of the most pressing priorities while building the structures to absorb future technological disruptions. This requires **action on four fronts**: procurement, data, partnerships, and political leadership.

Procurement as a market signal

The Commission's purchasing power is its most immediate lever. It should define clear AI procurement requirements that pull EU providers towards institutional needs, as it has already done for cloud sovereignty. These requirements should go beyond technical specifications to **set interoperability and cybersecurity standards, transparency benchmarks, and ethical, social, and environmental safeguards aligned with the AI Act and its future evolutions.**

Concretely, this means requiring that AI solutions procured by the Commission demonstrate explainability and human oversight by design; prohibit exploitative labour practices – such as unregulated click work – in their training pipelines; disclose their energy consumption and environmental footprint; and meet data governance standards that ensure quality, traceability, and non-discrimination.

The effect is to create a level playing field that **favours open, explainable, secure-by-design, and sovereign AI solutions promoting EU values, and sends a clear market signal about what the EU expects from the AI it buys.**

Crucially, these procurement frameworks should be **designed to extend beyond AI**. As emerging technologies with disruptive potential mature, the same principles of sovereignty, transparency, and ethical safeguards must apply. Building this into the procurement architecture now would avoid the need to start from scratch with each successive wave.

To amplify this signal, the Commission should **pool demand with like-minded EU administrations**, in line with the provisions of the proposed Cloud and AI Development Act. Shared procurement creates the critical mass that justifies investment by EU providers and spreads costs across participants. [The Innovator-General and the Innovation Engine](#) would be the natural coordination point for identifying common needs and aligning procurement strategies across the institution and, over time, with external partners.

Data as a strategic asset

The Commission's multilingual treasure trove of policy, legal, and institutional data is not merely an internal resource. It is a strategic asset for the EU AI ecosystem. Under appropriate and carefully studied conditions, non-sensitive institutional data should be made available to train or fine-tune EU AI models, **giving those models a contextual depth and multilingual capability that no non-European competitor would be able to match.**

This is where [the Single Market for Data](#) extends beyond the Commission's boundaries: a deliberate expansion, governed by clear rules, that positions the Commission not only as a user of AI but as a driver of its development in the EU, and that strengthens strategic alignment with Member States.

The AI systems that would emerge from this approach would not be generic tools adapted afterwards. They would be purpose-built, context-aware, and progressively attuned to the way EU organisations work. This is the strategic edge that **turns data sovereignty from a defensive posture into a competitive advantage.**

Sensitive institutional data, meanwhile, should be exclusively used to train and fine-tune the tightly controlled AI models the Commission uses, creating a form of **institutional entrenchment that deepens with every interaction.**

Partnerships that build, not just connect

The Commission's transformation would accelerate significantly if it builds deep, structured partnerships with Member State administrations, academia, and the private sector, enabling the exchange of talent, expertise, and practical experience that procurement and training alone cannot deliver.

Secondment schemes – both outward and inward – **should become a standard instrument**. Commission officials should be placed in innovation labs, technology companies, or other administrations to acquire hands-on experience with cutting-edge development and deployment – not only in AI, but in emerging fields of strategic relevance. In return, the Commission should host researchers in AI and emerging technologies, private-sector professionals, and Member State officials on specific transformation projects, accelerating delivery and cultural change.

These exchanges **feed directly into [the AI-augmented workforce](#) and provide [the Innovator-General](#) with a continuous pipeline of external intelligence and technology foresight**.

An intrapreneur scheme should complement these partnerships. Officials should be able to step away temporarily from their regular duties to prototype an innovative solution – whether AI-driven or leveraging other emerging technologies – to a genuine Commission challenge. If the prototype proves its worth, the official should be supported by the Commission's [Innovator-General and the Innovation Engine](#) they operate in scaling it further, and potentially leveraging a public-private collaboration with European providers.

This is how innovation becomes deeply engrained in the way we work and think in the EU. The possibility of establishing such collaborations should be an integral part of the scheme.

Together, these partnerships serve a dual purpose: they **enhance the Commission's internal capabilities**, as set out in the [recommendation on developing an AI-augmented workforce](#), and they **feed the continuous horizon scanning and technology foresight** that the Innovator-General and the Innovation Engine need to keep the institution on the curve if not ahead of the curve.

The network of partners created through these mechanisms also provides a testing ground for the kind of experimentation envisaged in the [recommendation on pioneering the Commission of tomorrow](#).

A fictitious illustration: From procurement to ecosystem – a European AI system for multilingual policy analysis

Suppose the Commission needs an AI system capable of analysing draft legislation across all the EU official languages, cross-referencing the existing body of EU law, and flagging potential inconsistencies. Today, such a capability would likely be procured from a non-European provider, trained predominantly on English-language legal corpora, and adapted – imperfectly – for multilingual use.

Under this recommendation, the process looks different. The Commission defines procurement requirements that include native multilingual capability as a core specification, not an afterthought. It requires the provider to demonstrate AI Act compliance, disclose training data provenance and labour practices, and meet energy efficiency benchmarks and cybersecurity standards. It pools this procurement with several Member State justice ministries facing similar needs, coordinated through the Innovator-General's office.

The Single Market for Data makes available – under strict governance – the Commission's multilingual legal corpus for model training. A European consortium, combining a legal-technology company with a university computational linguistics laboratory, wins the contract. The resulting system is not a generic tool with a translation layer. It is purpose-built for European legal reasoning, trained on European legal texts, and designed to operate across languages natively.

The Commission deploys the system. Its AI Helpers draw on it for legal cross-referencing. Three Member States adopt it for their own legislative drafting. The consortium grows, hires, and begins developing adjacent products for the European public sector. The Innovation Engine tracks the technology's evolution and feeds insights back into the next procurement cycle.

The result: a sovereign, fit-for-purpose AI capability, born from the Commission's deliberate use of its levers, sustained by shared demand, and serving the broader European ecosystem. This is what it means to shape, not merely consume. And the same logic – sovereign procurement, pooled demand, strategic data sharing, structured partnerships – will apply with equal force when the next disruptive technology arrives. The ecosystem built for AI is the infrastructure through which the Commission will meet tomorrow's innovations.

Political leadership as the binding condition

None of this will happen without sustained political championing. Shaping an ecosystem – for AI today and for the disruptive innovations that may follow – requires influence, persistence, and credibility at the highest level. **The Commission should identify and empower change agents at political level** who are technology-literate enough to understand what is at stake and

determined enough to drive the transformation forward. Without this leadership, ecosystem-shaping ambitions would remain at the level of good intentions.

Recommendation 4: Operate an Innovation Engine

The Commission's innovation efforts remain too scattered and ad hoc, due to the lack of a shared institutional direction. At the same time, re-engineering processes for the AI era and effectively harnessing the potential of emerging technologies are urgent and political.

To address this challenge, the Commission needs a permanent **Innovation Engine**: a governance model that makes innovation systemic, continuous, and accountable. At its core stands an **Innovator-General**: a transformational leader with institution-wide authority and a political mandate.

The Innovator-General leads a central **Innovation & AI Hub** that does not merely advise but builds, delivers, and scales.

Embedded in every Directorate-General, **Innovation Cells** connect to this Hub, ensuring that every service innovates locally while remaining part of a common strategy.

Together, they scan the horizon, set direction, experiment, scale what works, and stop what does not, **keeping the Commission ahead of the curve rather than trailing behind it.**

Problem statement

Without focused innovation governance, technology adoption risks unfolding the way many shifts have before: unevenly, opportunistically, and shaped more by the initiative of individuals than by institutional design. Some services experiment boldly. Others do not. And when pilots are successful, they stall for lack of a scaling mechanism. Failed experiments go unrecognised, their lessons left unpicked. And nobody owns the question that matters most: what comes next?

The Commission has no single point of ownership for innovation. Responsibility is diffused across services, committees, and ad hoc initiatives. This can lead to duplication, waste of resources, incoherence, and missed opportunities to scale what works.

The Commission also lacks a systematic mechanism for anticipating what comes next. Horizon scanning happens, but sporadically and without institutional weight. The partnerships, secondment schemes, and foresight networks proposed under the [recommendation on shaping the ecosystem](#) would

generate a continuous flow of external intelligence, but that intelligence needs a home, a mandate, and the authority to act on it. Without the Innovation Engine, the ecosystem's signals would arrive but would find no receiver.

The problem runs even deeper. Legacy systems and accumulated procedural complexity generate significant costs, delays, and risks, including growing exposure to cyber threats that are increasingly AI-induced. And without a structured framework for assessing and redesigning processes before applying technology, **AI would be layered onto processes that are themselves unfit for purpose.**

In essence, if this problem is not addressed head on, **the transformation the Commission urgently needs** to become a more efficient, responsive and innovative human-centric digital administration in the AI era and beyond **will remain hollow**: a surface-level exercise that would reproduce existing fragmentation under a digital varnish.

Proposed solution

The Commission needs an Innovation Engine: an Innovator-General leading an Innovation & AI Hub that is working closely with Innovation Cells embedded in every Directorate-General.

The innovation engine's most important function may be its least visible: ensuring the Commission is never caught reacting to a disruption it should have anticipated.

Through systematic horizon scanning, continuous foresight fed by ecosystem partnerships and secondment exchanges, and the practical experimentation as set out in [the recommendation on pioneering the Commission of tomorrow](#), the Innovator-General keeps the institution positioned ahead of – or at least on – the curve of change.

This is how innovation becomes the way the Commission operates: not a side project, not a periodic reform exercise, but the permanent engine of institutional adaptation.

The Innovator-General: a mandate to experiment and to deliver

The Commission must appoint an Innovator-General: a transformational leader vested with institution-wide authority and a political mandate to drive the institution's innovation and AI transformation. The Innovator-General is not an adviser. The role exists to experiment and to deliver.

The Innovator-General occupies a central role in the Commission's overall reform drive. This leader would play a critical part in delivering [the Single Market for Data](#) and building [the AI-augmented workforce](#), while drawing on the ecosystem partnerships and foresight mechanisms established under the [recommendation on shaping the ecosystem](#).

The Innovator-General would also lead the convergence governance that connects the Greenfield – the Commission's built-in adaptation mechanism proposed under the [recommendation on pioneering the Commission of tomorrow](#) – with the established institution.

Innovation, as understood here, is not limited to the adoption of new technologies. It encompasses the continuous evolution of working methods: new ways of designing policy, organising work, engaging staff and citizens, managing knowledge, and rethinking processes.

The innovation & AI hub: a delivery engine

The hub is where institutional innovation takes concrete form. It tests ideas against real needs, turns successful experiments into ready-to-use tools and methodologies, and retires what no longer earns its place. **It provides what no individual service can deliver alone:** institutional reach, shared resources, and the authority to scale or stop.

The hub's mandate spans the full innovation lifecycle, from strategic direction to operational delivery:

- Setting the overall innovation direction and guiding principles for the institution, under the leadership of the Innovator-General;
- Scanning the horizon for emerging technologies and opportunities, in close cooperation with the ecosystem partners, secondees, and foresight networks established under the [recommendation on shaping the ecosystem](#);
- Leading corporate data policy and management, notably by delivering [the Single Market for data](#);
- Formulating and driving a process transformation framework, in the knowledge that the greatest value lies not in digitising existing processes but in creating new ones not previously possible;
- Experimenting with new ideas and turning successful ones into operational tools and methodologies: creating a continuous pipeline of innovation initiatives linked to business priorities, combining speed, agility, and practical impact;

- Integrating innovative technologies and processes into corporate risk management, including cybersecurity, applying a light touch for lower-risk projects and formal decision gates for high-risk deployments;
- Accompanying the structured handover of successful pilots into daily operations and, equally important, **identifying and stopping pilots, initiatives, or tools** that do not deliver on their promises or whose value is no longer justified;
- Communicating innovation activity and lessons learned across the institution – making visible what is being tried, what has worked, what has not, and why – so that every service can learn from the experience of others;
- Ensuring that the innovation drive delivers measurable results;
- Liaising closely with the relevant services for the delivery of digital solutions and with the Chief Operating Officer for strategic alignment;
- Managing a dedicated innovation budget.

Key principles underpinning process transformation are: AI readiness by design, security by design, user-centricity, interoperability, data-sharing by default, data-driven decision-making, trust, transparency, explainability, and accountability. Policy owners remain responsible for process purpose, outcomes, and performance. The Innovator-General, through the Hub, provides the method, the tools, and the governance.

Innovation cells: innovation embedded into operations

To ensure that innovation reaches every corner of the institution, the Innovator-General works through dedicated Innovation Cells embedded in each Directorate-General. These Cells are composed of AI, data, emerging technology, and organisational specialists whose role is to translate innovation opportunities into tangible outcomes at the local level, while remaining connected to the hub for resources, expertise, and scaling support. The cells:

- Identify innovation and AI use cases through direct engagement with staff, including rapid workshops and job-rethinking sessions;
- Lead local organisational and process redesign, including from a digital and AI perspective;
- Foster a local culture of experimentation – technological, organisational, and procedural – providing safe spaces where staff can test new approaches, learn from what does not work, and build confidence in new ways of working;
- Connect to the central Hub for resources, expertise, and scaling support;

- Share results – both successes and failures – with the Hub, ensuring that local lessons become institutional knowledge.

A fictitious illustration: How the Innovation Engine works

An Innovation Cell in DG AGRI notices that verifying compliance with Common Agricultural Policy environmental conditions requires staff to cross-reference satellite imagery, farm-level declarations, and regional environmental data manually: a process consuming thousands of hours annually, prone to error, and delivering results too late for in-season decisions.

The Cell brings the case to the Innovation & AI Hub. Within weeks, a small team prototypes an AI system that integrates satellite data with farm declarations held in the Single Market for Data and flags likely non-compliance for human review. The prototype is rough but promising.

A first pilot in two Member States reveals accuracy issues with certain crop types. Rather than abandoning the effort, the Hub iterates, refining the model, incorporating feedback from field inspectors, and drawing on expertise from the Joint Research Centre. A second pilot delivers strong results: faster detection, fewer false positives, earlier intervention.

The Innovator-General decides to scale. DG MARE, facing a parallel challenge with fisheries monitoring, works with the Hub to adapt the approach for maritime use.

Meanwhile, another pilot attempts to use AI to pre-score rural development grant applications by predicted impact, aiming to accelerate evaluation. Early results reveal that the model systematically favours larger, better-resourced applicants and disadvantages small-holder projects in regions with less digitised administrative records: a bias too deep in the training data to correct within a reasonable timeframe, and too politically sensitive to deploy even partially. The Hub stops it, documents the lessons on algorithmic fairness in funding decisions, and redirects resources to higher-value initiatives.

At the next horizon-scanning cycle, a secondee from a European space-technology company – hosted through the ecosystem partnerships described in the recommendation on shaping the ecosystem – flags an advance in synthetic aperture radar that could further improve detection. The Hub integrates the lead into its next development cycle.

The result: a concrete productivity gain, born from local insight, tested through structured experimentation, scaled where it works, stopped where it does not, and continuously fed by external foresight. This is the Innovation Engine at work.

This **hub-and-spoke structure** would ensure coordination between initiatives, avoid duplication, and support informed decisions on where to invest resources. It would bridge organisational silos and spread good practices, knowledge, and innovation across the institution.

Recommendation 5: Pioneer the Commission of Tomorrow

A fictitious illustration: DG APPLY – from blank page to proven practice

Imagine it is early 2028.

Following a structural recommendation from the large-scale review, the Commission creates a new service responsible for monitoring how Member States transpose and implement EU law. Let us call it DG APPLY.

This is needed because the task is currently dispersed across policy DGs and the Secretariat-General, plagued by backlogs, manual cross-referencing of legal texts across 27 legal systems and 24 languages, and infringement procedures that routinely take years to conclude. Staff know the system is struggling. Everyone agrees: it needs reform. Nobody knows where to begin, because every reform attempt must navigate the very structures it is trying to change.

DG APPLY could have been set up in the traditional way: inheriting the Commission's existing IT systems, processes, and accumulated habits, then gradually trying to improve them. Instead, it becomes the Commission's first **Greenfield**, a term borrowed from urban planning, where it means building on open land rather than navigating the constraints of what already stands. Applied to the Commission, it means starting from a blank page: no legacy systems, no inherited workflows, no accumulated habits. Only the law applies. Everything else is designed from scratch.

On day one, staff arrive to that blank page and, together with the Innovation Engine, they design the service from scratch. The Innovation & AI Hub deploys its process transformation framework and a team of Innovation Cell specialists work alongside DG APPLY staff in cross-functional teams, mapping the compliance monitoring process end to end: what legal judgments require human expertise, where AI can accelerate analysis, and how workflows should be structured when nothing is inherited. Together, they build AI-powered workflows from the ground up, supported by AI Helpers that draw on the Single Market for Data, national legal databases, and past infringement cases.

The AI leveraged by DG APPLY is mainly European AI, procured through the ecosystem-shaping standards the Commission has set, purpose-built for multilingual European legal reasoning. AI agents continuously scan national legal databases and flag potential transposition gaps. But it is staff who exercise legal judgment on whether a national measure genuinely transposes a directive, who navigate political context, and who engage directly with Member State authorities. The technology amplifies their expertise. It does not replace it.

Three months in, an agentic workflow misfires, flagging compliant measures as deficient. In the established Commission, this may trigger anxiety and retrenchment. In the greenfield, the team and the innovation engine act together: they stop the workflow, analyse the error, refine the system, and redeploy, using the decision gates that the hub's risk management function had built into this high-risk workflow from the outset. The engine documents the lesson, communicates it institution-wide, and feeds it back into the process transformation framework so that every future deployment benefits. No careers are damaged. The system improves. **Risk appetite grows, because the cost of failure is learning, not catastrophe.**

The Innovator-General evaluates what works. The AI-assisted transposition screening—now refined and proven—is transplanted to the Secretariat-General's existing infringement coordination team. A seed of proven innovation takes root in the established Commission. Other DGs request similar tools for their own compliance monitoring. Innovation spreads not by decree, but by demonstrated value.

A year in, a warning. DG APPLY's own processes begin to calcify. Staff start treating their AI workflows as fixed, their methods as settled. The Innovation Engine intervenes: **a greenfield that stops evolving becomes a brownfield**, an environment encrusted with the very legacy it was built to leave behind, no different from the established institution it was designed to challenge. The engine's horizon-scanning function has identified a new generation of AI-driven legal reasoning capabilities. The greenfield integrates them, redesigns its compliance workflows accordingly, and the cycle of adaptation continues.

While the story above is imaginary, the principle behind it is real. And it is the subject of this recommendation.

Problem statement

The Commission has reinvented itself before. But **transformation programmes, however ambitious at inception, tend to be diluted by the institution that adopts them.** Too often, existing structures absorb reform the way a body absorbs a foreign element: slowly, partially, and sometimes with outright rejection.

Accumulated procedural complexity, entrenched habits, and a culture that rewards compliance over experimentation all conspire to blunt the edge of change. The result is a pattern familiar to anyone who has lived through reforms that promised quantum leaps but delivered modest gains: bold ambitions at the start, incremental adjustments at the end, and a gap between the two that widens with every cycle.

The common thread is the absence of visionary change agents with the political backing to see transformation through.

This pattern was manageable when the pace of external change was slower. It is no longer. AI is reshaping how organisations operate, how decisions are made, and how citizens interact with public authorities, and the next wave of disruptive technology may arrive before the Commission has finished adapting to this one. **Incremental reform cannot close a gap that widens faster than the institution can move.**

The four preceding recommendations – the [Single Market for Data](#), the [AI-augmented workforce](#), [shaping the ecosystem](#), and the [Innovation Engine](#) – provide the foundations, the tools, and the governance. But they operate within the established Commission, where **the weight of legacy constrains even the best intentions.**

Proposed solution

The Commission should establish a greenfield: a parallel operating environment, ring-fenced from the established institution, where the future of European public administration and new ways of working can be built, tested under real conditions, and proven at full scale before they are transplanted back to the Commission. It is not a one-time experiment. It is the Commission's **built-in adaptation system**: the permanent mechanism that ensures the institution is never caught standing still.

For the greenfield to work, **seven conditions should be met.** They are simple to state but demand serious institutional commitment.

1. A standalone entity. The greenfield should be an entity of the Commission with its own leadership, staff, and ways of working. It should have the authority and resources to operate without depending on the structures it is designed to challenge, whilst remaining accountable to the College.

2. A real political mandate. The greenfield is not a laboratory disconnected from real work. It should be tasked with delivering a substantive political outcome – a strategy, a regulation, a programme – to a clear deadline, with the visibility and accountability that come with any high-profile Commission file. The mandate is what makes the experiment credible and the lessons transferable.

3. Free from the past. The greenfield should not inherit the Commission's existing IT systems, internal processes, or accumulated habits. Legal obligations still apply, but everything else should be designed from scratch. This is what

makes the blank page real and what allows genuinely new ways of working to be tested at full scale.

4. Built around AI from day one on European technology whenever possible. The greenfield should stand on the foundations the previous recommendations provide. Staff and AI agents interact using workflows designed from scratch, under clear rules about what each can decide and what requires human sign-off. Wherever feasible, the greenfield runs on European technology, putting the Commission's ecosystem-shaping ambitions into practice and providing a real-world proving ground for the EU providers it seeks to strengthen.

5. A data foundation from day one. The greenfield's AI is only as useful as the data it can reach. From the start, it draws on and contributes to the Single Market for data. Inside the greenfield, an agentic data governance function – an AI system that maps, manages, and supervises the greenfield's own data with limited human intervention – keeps that data usable, current, and trustworthy.

6. Designed to keep evolving. The greenfield should be built to adapt continuously: testing new ideas, dropping what does not work, scaling what does, reinventing itself when the world shifts. It should never settle into a fixed form. The moment it would stop evolving, it would become the brownfield it was designed to escape. The institution-wide capability for continuous learning that sustains this evolution should be housed in the Innovator-General's function.

7. Convergence with the established Commission. The greenfield should not be an isolated island. At regular intervals, the Innovator-General should evaluate what has worked, what has not, and what is ready to be transplanted into the established institution. The Innovator-General should then report on the greenfield's delivery against its political and operational priorities. The point of the greenfield is not what stays inside it. It is what travels back. Each successful innovation should become a seed of proven practice, planted in the established Commission and nurtured to take root. Over time, these seeds would reshape the institution from within. Not through top-down decree, but through demonstrated value.

Executive summary Compliance and impact

Problem statement

Compliance is fundamental for the Commission as an accountable public institution. Creating boundaries, transparent processes and clear responsibilities are core tools for upholding values of good governance, driving the European project, achieving policy objectives, and creating a positive impact on citizens' lives. A modern Commission must respond in an agile, proportionate manner to the shifting geopolitical, risk and technological landscape. A new adaptive compliance culture is therefore essential to address the challenges of tomorrow.

Our review finds that current compliance and control in the Commission requires far more resources than should be necessary. The high number of rules combined with a structurally low risk appetite has led to an overly formalistic system, slowing down the good functioning of the organisation, its capacity to innovate and its attractiveness as an employer. We examined the whole compliance and control chain — from governance to the annual planning cycle, the approach to risk, impact assessment, and specific areas such as data protection and crisis preparedness — and put forward seven recommendations to rebalance the Commission's system.

Recommendations

1. Adopt an agile governance framework

The current governance framework is poorly known and understood by staff and no longer fit for purpose. We propose a revised, values-driven framework that clarifies roles and responsibilities, empowers staff to take proportionate risks, introduces agile structures, and replaces siloed processes with cross-DG collaboration under clear oversight.

2. Streamline the Strategic Planning and Reporting cycle

The current Strategic Planning and Programming cycle (SPP) is fragmented, document-heavy and resource-intensive, with elements of the process serving too many purposes at once. A streamlined, risk-based, and digitally enabled framework — built around coherent corporate indicators, high-quality data, and strategic alignment with the Commission's political priorities and the future MFF — would strengthen agile governance, improve decision-making, and significantly reduce administrative burden.

3. Adopt a genuine risk-based approach

Files circulate through long validation chains with limited added value, while corporate rules provide little guidance on appropriate decision-making. We recommend a clear delegation framework that categorises decisions by risk and sensitivity, paired with a shift from purely ex-ante approval chains to targeted risk-based ex-post controls. Rules for transparency and ethics should be assessed to ensure effort remains proportionate to actual risk and decision-making is assigned to the right level in the organisation.

4. Bundle expertise on data protection

Operational units can lack the expertise to navigate EU data protection rules confidently, leading to overly restrictive approaches that risk inaction where action is warranted. We propose cross-DG centres of excellence that pool specialised knowledge and develop practical, AI-supported compliance tools — enabling the Commission to lead by example.

5. Safely exchange and utilise aggregated and anonymised data

Aggregated and anonymised data do not flow smoothly within the Commission. Staff should be made fully aware when data does not constitute personal data and can be exchanged safely for policy decisions, including on HR matters — unlocking more evidence-based policy and decision-making.

6. Understand impact for better performance of Commission action

Develop a system that enables the Commission to understand the real-world impact of its actions. By embedding digital data governance into every action, pooling knowledge across services, and strengthening partnerships with stakeholders (Member States and internal clients), we can continuously improve policy implementation and deliver greater public value.

7. Develop principles for compliance in crisis situations

Compliance procedures can slow down crisis response and weaken effectiveness. We recommend defining streamlined minimum rules for extraordinary situations. This includes clear guidance on who has the authority to declare when a crisis exists or ceases and pre-defined compliance requirements for each crisis scenario category.

Recommendations on compliance and impact

Recommendation 1: Adopt an agile governance framework

The governance framework should enable the Commission to achieve its political objectives in a changing world. At the heart of the framework are the core values of good governance: the rule of law, integrity, ethical decision-making, inclusivity, accountability, transparency, fairness, collaboration, effectiveness and efficiency.

Problem statement

The Commission's current governance framework is outdated and unfamiliar to staff. Built to address past challenges, it focuses too narrowly on financial management and cannot keep pace with today's shifting geopolitical, economic, and technological landscapes. To navigate developments new considerations, such as AI and the new MFF, we must fundamentally redesign this framework. As a foundation of our work, the new framework must embed clear corporate values and adopt a unified, whole-of-Commission approach.

The current governance framework, including the SPP cycle, is overly resource-intensive, making it unsustainable for a Commission that needs to deliver priorities quickly and efficiently.

Our review reveals that the current framework discourages proportionate risk-taking and reinforces silos with individual DGs operating as isolated authorising officers by delegation. This fragmented approach consequently stifles both innovation and cross-DG cooperation.

Proposed solution

The Commission's governance framework is anchored in its mission to act in the common European interest, act as guardian of the treaties and to advance European integration. To achieve this, we use robust compliance and impact measurements which rely on the independence, professionalism, and the dedication of staff and leadership, to keep the Commission firmly rooted in its founding purpose.

The Commission requires a redesigned governance framework to increase agility while maintaining and improving clear lines of responsibility, including on non-financial matters. A corporate values-driven governance framework must be the compass guiding Commission action at all levels. To achieve this, we propose the following measures:

Overhauling the core framework

Revising the current governance framework—specifically C(2020)4240—to meet the following criteria:

- **Balanced and values-driven:** Aligned with the goals of simplification, proportionality and transparency.
- **Institution-wide ownership:** Widely understood and applied by all staff, with top management setting a clear tone and prioritising corporate values over individual departmental interests.
- **Clear and agile role assignment:** Explicitly defined responsibilities at every level, designed to support collaborative and agile organisational structures.
- **Future-proof:** Able to adapt and respond to geopolitical, economic and technological shifts while encouraging experimentation.

Empowering staff and clarifying leadership

The governance framework should recognise that Commission staff are the foundation of good governance. It should therefore ensure:

- **Objective advice:** Staff are able to provide independent advice free from political interests or other influences and act solely in line with common institutional values.
- **Empowered culture:** Leadership entrusts and empowers staff, encourages agility, collaboration and proportionate risk-taking across unit and DG boundaries in a whole-of-Commission approach.
- **Separation of powers:** A distinct separation between political guidance and decision-making, administrative execution and responsibilities is made. The Code of Good Administrative Behaviour should remain the basis for guidance on how staff should carry out external interactions.

Streamlining decision-making hierarchies

To increase efficiency, the Commission must delegate operational decision-making appropriately.

- **Appropriate Delegation:** The College level should only deal with the most politically sensitive issues (such as major resource allocations). Day-to-day administrative and operational matters should be delegated to the Corporate Management Board (CMB), Directorates-General (DGs), or other designated bodies.

- **Digital and technological representation:** Given the increasing role of technology and AI in corporate matters, DIGIT should be included in the CMB.
- **Institutional Reality Checks:** Decision-making processes should integrate a "user perspective" early on, utilising early involvement from the Group of Resource Directors or representation from DG clusters within the CMB.

Centralised leadership

Under the President's authority and the supervision of the CMB, a single lead service must take overall ownership of governance to ensure institutional consistency. The Secretariat-General (SG)—specifically the Chief Operating Officer (COO)—should assume this role.

Under the COO's strategic direction, specialised structures will lead specific operational areas via the following mechanisms:

- **Data access for proactive management:** To enable a proactive rather than reactive administration, the COO—supported by a small team—should have default access to central services' data as needed to manage the organisation.
- **Pragmatic compliance:** To prevent over-compliance from undermining political and operational goals, the COO and Resource Directors should conduct regular, pragmatic assessments (including short surveys). This will balance regulatory requirements with strategic priorities, fostering an agile, purpose-driven culture while maintaining accountability.
- **Agile planning and continuous scrutiny:** Annual planning and reporting cycles should be streamlined to allow for easier adjustments. The governance framework itself, as well as internal rules, must be continuously reviewed and adapted to ensure they remain fit for purpose.
- **Encouraging innovation and safe failure:** To drive experimentation and agility, the Commission should explicitly accept failure as a valuable learning outcome.
- **Appointing a Chief Innovation Officer (CIO):** A new CIO role should be created to unlock the Commission's innovation potential and channel staff proposals. Regularly invited to CMB meetings, the CIO should:
 - Pilot innovative ideas in selected departments and scale successful initiatives Commission-wide.
 - Create "sandboxes"—controlled environments to trial new internal rules or ideas that deviate from the formal governance framework.

- **Forward-looking tech governance:** The COO and CIO should jointly propose a framework for the responsible, ethical and innovation-friendly use of AI, future technologies, and corporate data sharing.
- **Performance-driven policy:** The governance framework must prioritise performance monitoring and evaluation. Policy objectives should be clearly defined in the strategic programming document, directly reflecting the political direction set by the State of the Union address.

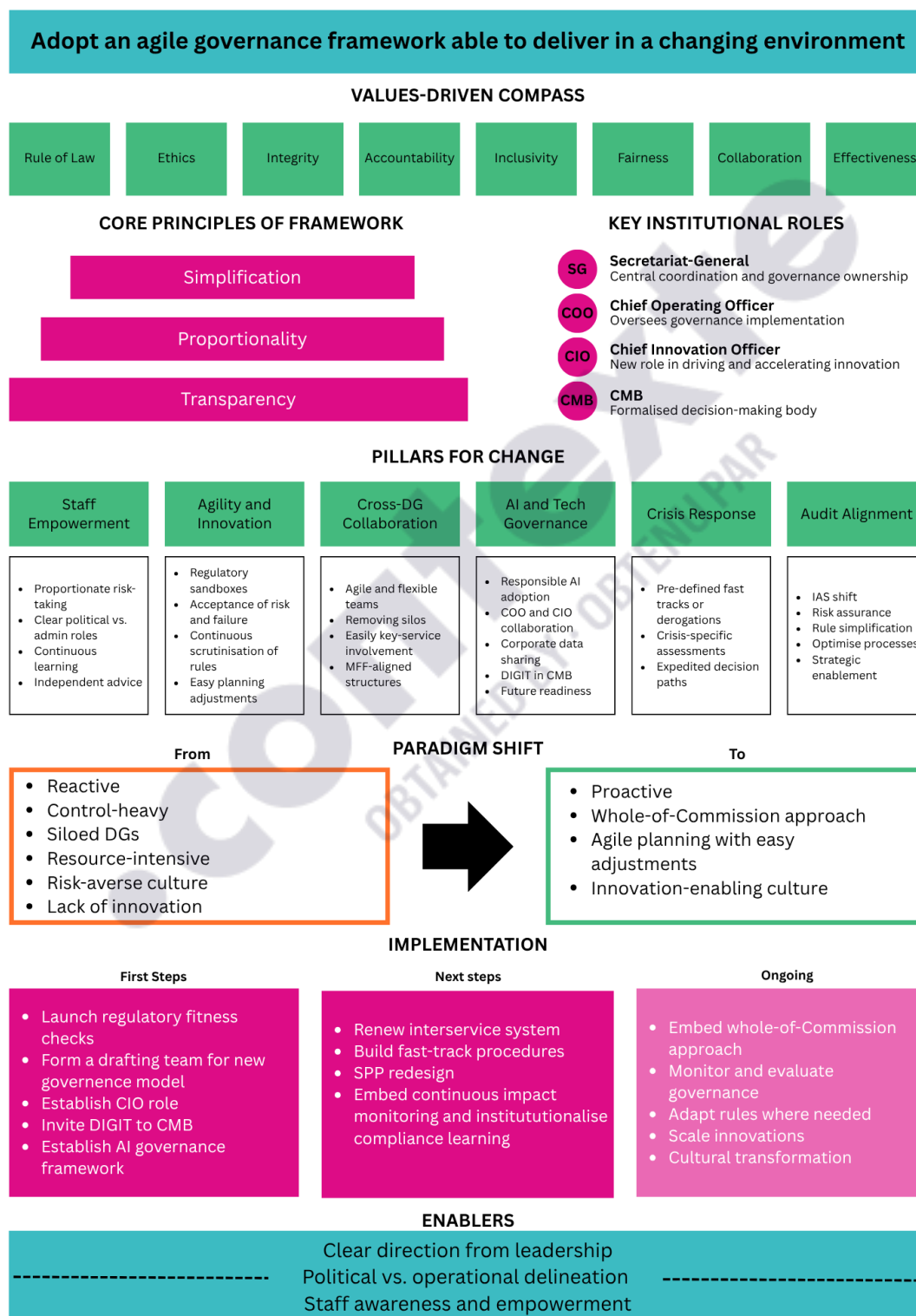
Collaboration and cross-DG working

The current interservice system is no longer optimal and does not align with the operational structure of the upcoming MFF. The new governance framework should therefore:

- **Replace siloed processes:** Replace current procedures with agile, policy-oriented workstreams involving staff from all relevant DGs.
- **Provide flexible mandates:** Encourage cross-DG teams to collaborate without creating unnecessary bureaucratic barriers.
- **Ensure early involvement:** Involve key departments in the earliest stages of the decision-making process to balance speed with inclusivity.
- **Expedited crisis procedures:** The governance model should include pre-defined, fast-track options to handle crises affecting the EU, the Commission, or both.
 - *Activation and oversight:* The Secretariat-General should have the authority to activate fast-tracked procedures or approve temporary derogations based on the nature of the crisis.
 - *Continuous improvement:* The frequency and usage of the emergency tracks should be regularly reported to the CMB, serving as a key signal for where reviews and updates of existing rules are needed.
- **Internal Audit Service modernisation:** The Internal Audit Service (IAS) should continue adapting its methodologies and priorities to the Commission's evolving governance framework to support a strengthened compliance and assurance environment.
 - *Focus shift:* The IAS should focus more on assurance work linked to performance and strategic enablement rather than control-based audit work.
 - *Process optimisation:* The IAS should actively identify and recommend the removal of obsolete rules and inefficient processes, ensuring the compliance model remains effective and adaptable.

Implementation

We propose a drafting team, led by the Secretariat-General and including colleagues from policy DGs/operational departments at all levels to draft a new Governance Decision.



Recommendation 2: Streamline the Strategic Planning and Reporting Cycle (SPP)

The annual planning and programming cycle (Strategic Planning and Programming -SPP-should maintain its core purpose to provide reasonable assurance while improving quality, management relevance and significantly reducing administrative burden and duplication. To accomplish this, the cycle should undergo an overhaul, and a new framework should be adopted to include to following:

- **Whole-of-Commission application:** Encompasses all areas of the Commission's operations to ensure institution-wide alignment.
- **Prioritises material risks:** Focuses strictly on high-impact risks, establishes clear managerial ownership, and introduces simplified, structured reporting.
- **Drives agility:** Enables regular, seamless adjustments throughout the year, allowing the framework to quickly pivot and reflect the political directions.
- **Tracks measurable results:** Translates high-level strategic objectives into a coherent matrix of clear result and output indicators.
- **Purpose-driven reports:** Reporting should focus on providing comprehensive state-of-play of the Commission's activities, including the State of the Union address.
- **Write once, reuse everywhere:** Apply the 'write once, reuse everywhere' principle across planning and reporting instruments to eliminate redundancy.
- **Streamlined reporting architecture:** The broader reporting architecture should be simplified and consolidated at the corporate or policy level where appropriate. This should include utilising digitally advanced corporate tools, and AI capabilities to automate and streamline the entire cycle.

Problem statement

The current SPP cycle is fragmented, document-heavy, and resource-intensive. Management plans (MPs) and annual activity reports (AARs) attempt to fulfil multiple purposes at once, including compliance and operational reporting, audit defence, internal and external communication. This overlapping focus has resulted in overly lengthy, complex documents that dilute strategic value and lack a clear core purpose.

There are significant duplications between strategic plans, annual management plans, AARs, the AMPR, and sectoral reporting. Similar information regarding objectives, indicators, risks, and financial data is repeatedly drafted and reformulated across separate documents, offering little added value for assurance, decision-making or effective management.

Furthermore, large parts of the reporting cycle still rely on manual drafting, fragmented workflows, and repetitive administrative work split across multiple information systems. Because of this heavy reliance on manual inputs and the sheer volume of the output (exceeding 8,000 pages every year, including annexes), MPs and AARs remain highly prone to error.

Proposed solution

The future MFF architecture, with a simplified programme structure, offers an opportunity to update and streamline the SPP cycle. This can be achieved with:

- **Structural realignment:** Aligning the entire reporting process directly with policy areas of specific MFF headings, moving away from fragmented departmental silos.
- **Transition to performance dashboards:** Replacing traditional, static reporting obligations with intuitive, dynamic performance dashboards.
- **Leveraging the Single Gateway:** Utilising the proposed Single Gateway – the centralised public website designed for the MFF 2028-2034 – to provide real-time, consolidated information on financial implementation, budget performance and fund recipients.
- **Aligning political and strategic objectives:** Ensure coherence between high-level political objectives—such as those set out in the State of the Union address—and the formal strategic planning cycle.
- **Establishing common indicators:** Establish a unified set of indicators covering all Commission activities (both financial and non-financial), using the Performance Regulation’s result and output indicators as the baseline for spending programmes.
- **Tracking governance metrics:** Introduce a common set of internal governance indicators to consistently track HR trends and digital transformation progress across the Commission.
- **Consolidating corporate reporting:** Streamline the annual reporting architecture by either consolidating AARs by policy area (aligned with key missions and future MFF headings) or producing a single, corporate Annual Management and Performance Report with policy-specific chapters.

- **Sharpening assurance accountability:** Achieve a closer alignment between the AAR and the formal powers and duties of the authorising officer (as defined in Article 74 of the Financial Regulation). Reporting must focus strictly on the material information required to provide true assurance and accountability, including significant risks, formal reservations, major deviations, and key control weaknesses.
- **Adopting a digital-first approach:** The environment will be powered by corporate AI tools, dynamic dashboards, automated workflow management, and digital approval processes, systematically eliminating reliance on traditional, paper-based reporting.

Implementation

Option 1 (change to the Financial Regulation)

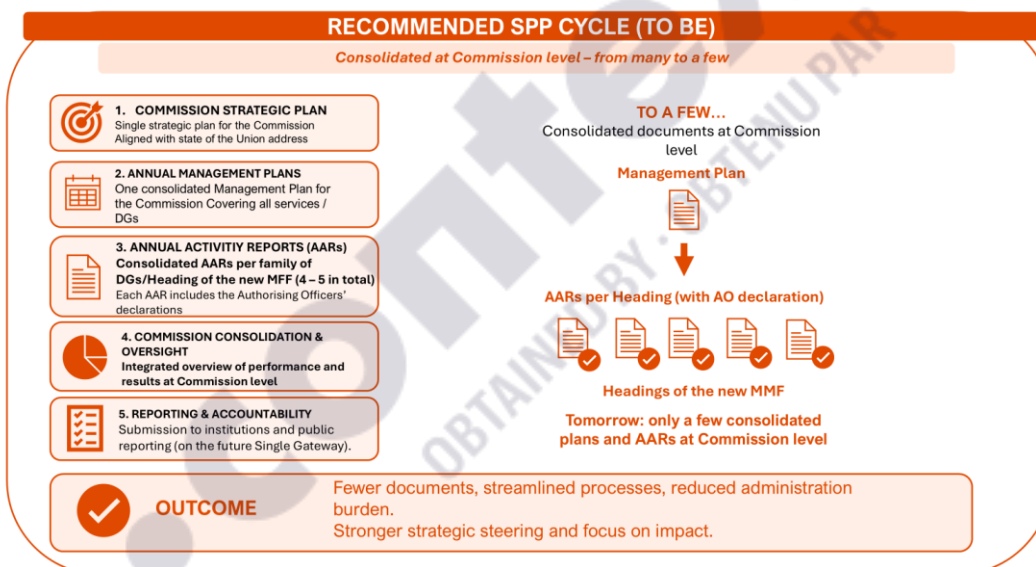
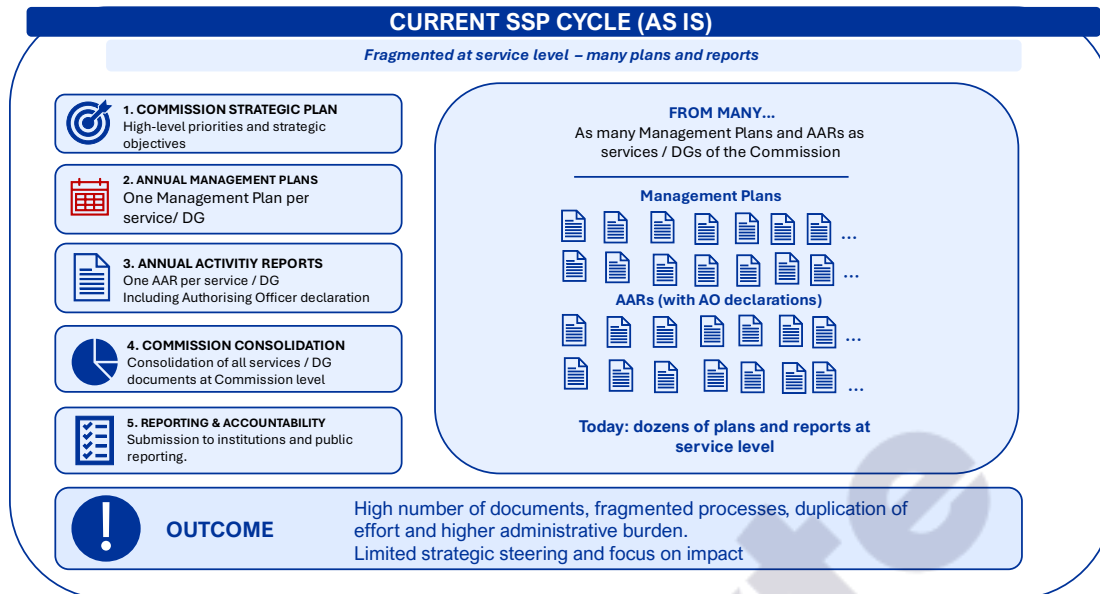
- Assess the legal, operational, and governance implications of replacing the AARs with a single AMPR including a declaration of assurance from all AODs.

Option 2 (no change to the Financial Regulation)

- Create a single, centralised management plan for the whole Commission (similar to the strategic plan).
- Develop simplified Commission-wide templates and guidance for the full SPP cycle strictly focused on management assurance, risks, reservations and material issues.
- Assess the legal, operational, and governance implications of consolidated reporting models ahead of the next MFF cycle in close collaboration with operational DGs.
- Pilot simplified and consolidated reporting approaches in selected areas before broader rollout. For example, a joint report for one MFF heading or one overarching policy objective replacing individual reports in that area.
- Progressively integrate reporting systems to replace repetitive narrative updates with automated data flows, standardised templates, and digital workflows.
- Replace mandatory biannual internal control reports with the Annual Activity Report (AAR), relying instead on immediate, ad-hoc escalation for any material risks.

Conduct a feasibility implementation study on option 1 and test option 2 with key stakeholders (e.g. DGs, audit teams). Launch a pilot to test this approach in the 2027 annual reporting exercise.

Draw up a digital roadmap to integrate systems and automating workflows.



Recommendation 3: Adopt a genuine risk-based approach

Problem statement

Across several Commission processes, files are submitted for approval with long validation chains, involving multiple hierarchical levels, adding limited or no value at each stage. This practice dilutes accountability, slows down decision-making, and creates a false sense of collective assurance whereby no single entity has clear ownership of a final decision. Furthermore, this resource-intensive practice varies wildly from service to service without clear justification, and internal checks tend to focus on formal endorsement rather than informed judgement, risk awareness, or the quality of the outcome.

The corporate rules provide minimal guidance on the decision-making levels and only provide guidance in the following areas:

- Working Methods of the European Commission [P\(2024\)5](#);
- Signature levels for access to documents; and
- Signature levels for negative replies to interservice consultations.

Our review finds that the current approach is inconsistent with a risk-based internal control system and undermines the core principle of clear, unambiguous authority and accountability.

Proposed solution

The Commission should establish a clear delegation framework for decision-making. The framework should classify decisions according to their level of risk and sensitivity.

To support this approach, the Commission should:

Establish a clear delegation framework

The Commission should adopt a comprehensive delegation framework that classifies decisions according to their risk and sensitivity, explicitly specifying whether ownership rests with desk officers, Heads of Unit, Directors, or Directors-General. This framework should:

- **Define discretionary limits:** Set clear, transparent parameters for individual decision-making.
- **Shift to ex-post oversight:** Replace overly burdensome, multi-layered ex-ante approval chains with targeted ex-post checks where appropriate.
- **Equip staff:** Provide tailored training and practical digital tools to ensure staff can apply the framework confidently and consistently.

- **Ensure regular reviews:** Review thresholds dynamically to respond to emerging institutional risks.

Revise management expectations and performance assessment frameworks

Updated management expectations and performance assessment frameworks should explicitly require leaders to:

- **Empower teams:** Delegate decision-making down to the most appropriate operational level.
- **Champion a no-blame culture:** Protect and support staff when soundly judged, reasonably balanced decisions lead to unintended outcomes.
- **Manage risk proactively:** Shift managerial focus toward striking an appropriate balance between risk and opportunity.

Strengthen the role of the Group of Resource Directors (GDR)

The GDR should be empowered to collectively define and monitor risk acceptance thresholds across the institution, transforming it into a vital decision-shaping body that:

- **Tracks systemic trends:** Monitors cross-cutting risk trends across the entire organisation.
- **Evaluates internal bureaucracy:** Assesses the necessity and impact of new internal compliance requirements.
- **Coordinates responses:** Recommends cohesive, institution-wide responses to structural issues.

Apply a genuinely risk-based approach.

A genuine risk-based approach requires process owners to weigh the administrative cost of 100% compliance against the actual risk of error, utilising sample-based checks wherever sufficient and proportionate. This calibration must be mirrored across compliance, control, and financial management frameworks to match actual financial and reputational exposures. For example:

- **Measure knowledge of risk exposure via staff surveys:** To accurately evaluate the Commission's maturity and confidence regarding risk and compliance the institution should deploy brief, targeted staff surveys. For example, these could assess knowledge on access to documents or data protection.

- **Streamline routine operations:** Apply simplified, standardised procedures to low-risk missions between Commission sites or to Strasbourg and Luxembourg.
- **Calibrate debt recovery:** Ensure financial recovery actions remain strictly proportionate to the amount at stake and the true likelihood of successful recovery, particularly in insolvency cases.
- **Accept tolerable risk:** Accept a limited degree of litigation and reputational risk in cases of legal uncertainty if a hyper-defensive interpretation would undermine critical policy objectives. For example, in the case of access to documents.

Develop a modern, digitally enabled central risk registry

The Commission should transform the existing Centrics system (the central risk repository) from a passive registry into a proactive, strategic analytics tool. By leveraging AI-based text and pattern analysis, an upgraded Centrics tool should:

- **Detect recurring issues:** Automatically flag repeating exceptions, reservations, and compliance bottlenecks.
- **Identify cross-DG weaknesses:** Surface systemic vulnerabilities across separate Directorates-General.
- **Isolate structural problems:** Map data to distinguish isolated, one-off incidents from deep-seated structural issues.
- **Inform rule making:** Support evidence-based decisions on whether risks should be accepted, mitigated, or addressed by amending the underlying corporate rules.
- **Optimise audit scheduling:** Prioritise internal audits and management reviews based on objective, data-driven risk assessments.

Implementation

The Commission has established rules on transparency and ethics (rules on meetings with stakeholders, rules on declarations and authorisations in the area of ethics) that require extensive compliance efforts from the administration and individual staff members. Since 2025, more than 7000 meetings with over 5000 entities were registered.

In the case of ethics, the centralised HR unit currently handles more than 4,000 formal requests. Each of these requires a structured workflow and a decision by the Appointing Authority.

Our assessment has identified these two areas as potential candidates to evaluate how best to balance administrative efficiency against potential reputational risk. In line with assigning the appropriate decision-making level, Appointing Authority decisions should be revisited to ensure that their powers are delegated to the correct level and harmonised across all services.

Recommendation 4: Bundle expertise on data protection

Data protection should not be seen as an obstacle to action. By developing intuitive and practical tools for compliance, the Commission should lead by example, showing the private sector and Member States how to effectively manage compliance with EU data protection rules.

The Commission should put in place solid and practical solutions by setting up dedicated centres of excellence on data protection taking over tasks for operational units that lack such expertise.

Problem statement

The protection of personal data is a fundamental right enshrined in Article 8 of the Charter, to which the Commission attributes high importance. However, due to the high threshold of compliance set by EU legislation, in particular the European Data Protection Regulation (EUDPR), which is also interpreted strictly by the Court of Justice, operational units in the Commission sometimes take an overly restrictive approach.

Due to a lack of deep technical familiarity with data protection rules, units often default to two defensive behaviours:

- **Risk-averse inaction:** Opting for an overprotective approach 'just to be on the safe side', which mistakenly assumes that personal data can never be utilised.
- **Over-consultation:** Escalating straightforward processing operations to the Data Protection Officer (DPO) network for approval, adding unnecessary administrative layers.

This cautious culture carries the risk of producing 'false negatives' (stopping action in an area where we should act) or unnecessary additional bureaucratic steps in an operational process.

Proposed solution

Establishing centres of excellence

Small departments often lack the necessary critical mass, capacity, and specialised knowledge to navigate complex data protection rules. To

address this, the Commission should establish Centres of Excellence to pool in-depth expertise:

- **Targeted support:** These centres will bring together a cross-DG group of data protection experts to handle complex technical tasks for operational units that lack internal capability, leveraging AI tools to streamline workflows.
- **Complementary role:** They will not replace Data Protection Coordinators (DPCs) or duplicate existing coordination tasks. Instead, they will act as an operational resource for specialised problem-solving.

Defining good practices

Building on this expert work, the Commission should regularly publish clear and relevant good practices that strike a sensible balance between protecting personal data and pursuing public-interest objectives. While these rules may introduce a tolerable, calculated level of risk, they would significantly simplify day-to-day compliance. Examples could include:

- **Anonymisation thresholds:** Defining clear volume or demographic baselines (e.g., specific nationalities or sample sizes) where data shifts from personal to anonymous aggregated data, thus not covered by the EUDPR.
- **Public disclosure standards:** Defining clear hierarchical thresholds for public disclosure. For instance, currently we disclose data relating to officials at Director level and above.

Recommendation 5: Safely exchange and utilise aggregated and anonymised data

Commission staff should be encouraged to safely exchange aggregated and anonymised data within the institution and across other EU institutions, agencies, and bodies, ensuring data flows smoothly to support policy decisions, administrative operations, and HR management.

Problem statement

Aggregated and anonymised data does not flow smoothly within the Commission or towards other institutions, often due to a misconception that such data could constitute personal data, to which the European Data Protection Regulation (EUDPR) rules would apply. Consequently, staff frequently lack the awareness that truly anonymised data falls outside the scope of data protection restrictions, leading to over-caution and administrative paralysis.

Proposed solution

When properly aggregated and anonymised data does not constitute personal data, the Commission should ensure that officials across all EU institutions, agencies, and bodies are fully trained on its definition and scope. To unlock the value of this data, the Commission should authorise and encourage departments to share non-personal datasets by default, eliminating unnecessary compliance checks and streamlining institutional decision-making.

Recommendation 6: Understand impact for better performance of Commission action

The ultimate test of our institutional compliance is to assure that Commission actions achieve real world societal outcomes that are in line with EU treaty and policy objectives. We can adhere to the best set of rules, with the best systems, but if our policies do not maximise the positive benefits the EU promises, we risk losing Member States' and people's trust. Therefore, the work on compliance also needs to address how we understand the impact of Commission action, as a basis for improving policy effectiveness.

Problem statement

The Commission has a strong formal system for confirming that funds are spent lawfully, legislation is implemented, and that rules are followed. Current funding instruments, alongside future funding structures under the next MFF, include performance frameworks designed to capture the immediate outputs and results of EU spending.

While we often measure *what* was achieved, we have a lesser understanding of *why* EU spending performs better in some countries than others, how results are sustained over time, and to what extent they translate into socio-economic value.

For non-spending policy implementation, a similar gap exists. The Commission frequently lacks insight into the underlying reasons for why Member States struggle to properly implement EU legislation beyond basic legal transposition. It is also difficult to map the broader benefits, positive and negative consequences, or the administrative frictions EU policies can impose on local institutions, businesses, and citizens.

Finally, the Commission's own system of internal rules also requires regular review to ensure that they continue to provide an efficient and effective framework within which to operate.

The Commission can easily demonstrate that it acts lawfully but struggles to prove that it acts effectively. While the institution cannot control every external

variable that affects policy success, it rarely captures or acts upon the overall impact of its interventions due to structural barriers, including:

- **Inherent measurement challenges:** Real-world impact is naturally complex to measure and difficult to attribute solely to a Commission intervention, making annual assessments impossible.
- **Missing baselines:** The indicators and the data needed to assess impact are rarely identified when an initiative is prepared, and thus, are missing from evaluation processes.
- **Data fragmentation:** Existing data is fragmented across the organisation and is not sufficiently accessible from Member States.
- **Delayed and scattered evaluations:** Evaluation comes late in the cycle, and capacity is scattered across DGs using incompatible methods, and lacking institutional memory; and
- **Insufficient contextual planning:** The Commission's current method gives insufficient weight and time to estimating the expected impact, and unintended consequences of a policy measure, including considering implementation context and capacity in Member States.

Proposed solution

The Commission must make understanding and monitoring impact a standard and embedded practice. Rather than running evaluations as a detached, retrospective exercise, impact analysis must be embedded directly into the policy and decision-making cycle. This will create a positive learning loop that prevents the institution from duplicating work and reinventing the wheel. There are five connected aspects of understanding impact:

- **Evidence-by-default design:** Establish common templates, digital data strategies, standards, and guidance across all DGs from the very start of an initiative. Overseen and owned by the Secretariat-General, this requires an updated intervention logic for every policy alongside strict quality benchmarks for indicators, which must form part and parcel of proposals presented to the co-legislators.
- **Methodological support from the JRC:** Utilise the Joint Research Centre (JRC) as the core institutional partner to supply the robust evaluation methodologies and strict quality standards needed.
- **Establish a central coordination capacity:** Build a collaborative, matrix-structured network (organised by theme and country) around mission-based families of DGs. Coordinated by the Secretariat-General, this will feature a shared knowledge-and-learning hub to secure long-term institutional memory.

- **Dynamic and continuous evaluation:** Design impact evaluation to be a dynamic and continuous process initiated at a policy's inception to capture trends early and inform recalibration. Shifting away from rigid reporting obligations will alleviate the burden of ex-ante assessments and thereby, accelerate overall policy objectives.
- **Strengthen partnerships with Member States:** Member States are key to delivering EU policies on the ground. We need to ensure that we clearly understand and appreciate their institutional, legal and political contexts. Building this trust allows the Commission to deliver better outcomes on the ground and offer tailored support where local capacity is a key constraint.

This approach would make the Commission more agile in its ability to calibrate, change course and improve while delivering, rather than waiting for end-of-cycle evaluations. As impact is often a longer-term issue, it could be communicated at the end of each mandate as part of the legacy, not in the AMPs or AAR.

Implementation

To deliver this vision, the Commission should implement the following:

- **Formally adopt evidence-by-design:** Adopt a formal Commission decision making it mandatory to include an intervention logic, data plan, evaluation strategy, and capacity needs-assessment from the outset of any action (including internal rules) as a strict condition for approval.
- **Deploy a centrally coordinated, cross-DG network:** Establish central coordination and the learning loop with colleagues seconded part-time to mission-based cross-DG families in a matrix network.
- **Develop a unified methodology:** Develop a common methodological framework with JRC's support.
- **Leverage Member State Data and Knowledge:** Build federated access to Member State administrative data and systematic country knowledge. Partner with Member States to understand specific country contexts and close capacity gaps.
- **Calibrate rules and policies dynamically:** Calibrate policies (including internal rules) as needed, and as politically feasible to improve performance.

The Commission has struggled to measure impact for many years. However, scientific advancements, including new technologies, data and awareness, present new opportunities to build a world-class policy impact assessment system. Our proposal would further strengthen and leverage recent innovations, such as the performance framework for the MFF and the Secretariat-General's EU implementation approach.

Recommendation 7: Develop principles for compliance in crisis situations

Major crises and systemic disruptions require the Commission to take urgent action in situations of uncertainty and under increased political and public scrutiny. The compliance framework should allow for sufficient flexibility to adjust to the multitudes of possible crisis scenarios, while ensuring a minimum set of requirements are met under all circumstances. This principle applies equally to crises affecting the Commission itself during extended business continuity situations.

Problem statement

Compliance systems made for standard operations are not always best suited to situations of crisis. Following standard procedures, approval processes and documentation requirements without changes can slow down action, dilute accountability and ultimately weaken the Commission's ability to respond effectively to a crisis.

Emergency procedures exist but are sometimes outdated (Argus phones) and not very well known. The natural responsibility in crisis and business continuity situations naturally fall to the DGs, often making DG policy assistants the default contact points. The current governance framework cannot cover the full multitude of possible crisis scenarios – breakdowns of IT tools (including AI vulnerabilities), dangers to staff safety or lack of essential resources require very different paths of action.

Proposed solution

The Commission should establish an agile, risk-tolerant compliance framework that clearly defines:

- **The non-negotiable minimum:** The absolute baseline rules that must be followed even in extraordinary situations (e.g., the four-eyes principle, compliance with applicable law, and the strict traceability of decisions).
- **Clear trigger mechanisms:** Unambiguous ownership over who is empowered to declare that a situation constitutes a crisis and, crucially, when a crisis has officially ended.

To operationalise this, the Commission should develop a matrix of crisis scenario categories, mapping out pre-identified, proportionate compliance requirements tailored to the specific nature of each emergency.

Executive summary Simplification

Problem statement

Carried out effectively, measures to simplify our processes can reduce the administrative burden, improve the user experience, increase efficiency and help the Commission make better use of its resources. Simplifying our processes effectively can free up time for staff to focus on what matters most: delivering policy outcomes, solving problems and providing a valuable EU public service.

New technology developments, such as the use of data and AI, will undoubtedly change our working environment. Adopting these technologies responsibly and correctly across the board in the Commission can bring vast opportunities to change the way of working and help staff by lightening the administrative burden.

Across the European Commission, staff must manage increasing administrative complexity resulting from fragmented processes, overlapping tools, duplicated information requests, and growing reporting and compliance obligations. While digitalisation and innovation (notably through artificial intelligence) offer significant opportunities for simplifying processes, technology alone will not solve the challenges. Without simplifying the underlying processes and reducing unnecessary complexity, there is a risk that new tools simply automate existing inefficiencies rather than deliver meaningful results in terms of simplification.

This situation requires a shift from one-off simplification initiatives to a continuous approach that combines process improvement, modern digital services, better use of information, experimentation and responsible use of artificial intelligence.

In parallel with the work to implement the more structural recommendations, the Commission should launch a first wave of measures to produce **quick wins** that deliver visible results in a short timeframe. These could include (i) shorter validation chains for approvals, with any additional steps requiring justification of the need (ii) a review of low-value recurring reports, and (iii) a simple channel for staff to submit simplification proposals. Such measures would help build credibility, generate early benefits for staff and create momentum to pursue the next wave of recommendations.

The time for change is now. There is a clear and growing demand across the Commission to simplify processes, alongside external pressure.

Simplification is therefore not simply a technical adjustment, but a prerequisite for a future-ready Commission.

Recommendations

Note: the recommendations are ordered in line with the roadmap (see the last part of the report), from quick-win measures to more longer-term measures.

1. Simplify often, empower, take risks: renew our organisational culture (months 0-6)

Build a new our organisational culture to make the drive for simplification a continuous activity embedded in everyday work, driven by staff empowered to expand our culture beyond a focus on compliance. Small, incremental improvements implemented regularly are more sustainable and deliver benefits faster than large-scale reforms undertaken only occasionally. The work to simplify processes and implement the suggestions should also be steered and assisted centrally by specialised functions: by a Senior (or Chief) Simplification Officer and a centre for process improvement.

2. Break the briefing and validation chains and bring back proportionality (months 0-6)

Review briefing, coordination and validation processes to remove unnecessary steps, shorten validation chains, improve proportionality and ensure that effort is focused where it adds the greatest value.

3. Heal self-inflicted administrative burden created by internal decisions: the Omnibus approach, a vehicle for simplification (starting in months 0-6)

Review and simplify groups of related rules, procedures and obligations together rather than tackling them individually. This enables broader simplification gains and helps eliminate duplication and inconsistencies.

4. Test ideas for simplification before scaling up and measure for success (months 6-18)

Provide controlled environments where departments can test new approaches, digital solutions and AI-enabled processes before wider deployment. This reduces risk, helps identify what works in practice and accelerates learning and innovation.

5. Simplify in smart ways – a risk-based approach with the internal control structures we already have as part of the solution (months 6-18)

Take a smart, tailored approach to the challenge. Apply different levels of checks depending on the risk, complexity and sensitivity of the case and involve audit and impact assessment bodies in the Commission's work on simplification. Routine or lower-risk cases can follow simplified AI-supported workflows, while higher-risk cases remain subject to stronger human review and oversight. Where possible, reuse the structures we already have instead of creating new structures.

6. Reimagine the European public administration by using a mix of AI agents, 'one-click' services and simpler digital processes (months 18-36)

Reimagining our public administration implies freeing officials from working in fragmented systems, chasing signatures, and building paper trails for audits and instead using end-to-end workflows with accountability built into the process itself. It means letting AI agents or easy to use one-click AI based services do initial eligibility checks, first drafts, and handle low-risk procedures albeit under human supervision. Ultimately, this shift towards simpler and user-friendly digital services, reinforcing the corporate IT landscape and improving access to information should allow us to solve many persistent administrative burdens for staff.

7. Make our data intelligent and change the way we search - improve corporate search and prepare AI-ready data (months 18-36)

AI-ready data is information that is accurate, well-organised, accessible and reusable, so that AI tools can use it reliably to support the goal of simplification. This requires improving how information is organised, classified, searched and reused across the Commission. Better and smarter search capabilities, stronger information management and higher-quality data are essential foundations for future AI-enabled services at the Commission.

8. Develop EU institutional LLMs that 'think' like an experienced EU official (months 18-36)

An appropriately trained LLM will be able to process the diverse and complex ranges of information needed to assist an EU official. In addition, this type of LLM can support the development of AI capabilities able to work with the EU's languages, legal frameworks, values and administrative practices. This would help the drive to simplify processes and improve the quality, consistency and relevance of AI-supported analysis, drafting and decision-making across European public administrations.

Recommendations on simplification

The Commission has reached a point where the way it works internally is limiting its ability to deliver effectively. Procedures, checks and reporting requirements have multiplied over time without being systematically reviewed. The result is slower decision-making, less clarity and less time for core tasks.

The goal of simplification is not to pass a one-off reform. It involves taking a portfolio of choices all together. Without clear leadership, the suggestions to simplify our processes will not scale up. Without simplifying processes when they are designed, complexity will continue to creep into daily work. Without testing and scaling ideas that work, improvements will remain isolated. Without the right use of technology, data and AI, efforts to simplify will not deliver their full impact.

The Commission's simplification challenge is not unique. OECD evidence shows that administrative burden, fragmented implementation and insufficient evaluation are widespread across public administrations. 86% of countries have appointed a high-level simplification lead, but only 57% assess whether burden-reduction initiatives actually work. Although 78% of governments use digital tools to simplify processes, only 17% do so systematically and 66% identify data quality as a major obstacle.

Taken together, the recommendations below are designed to create a clear, consistent and coherent approach to the goal of simplification. **Progress in one area requires progress in the other areas too.**

Three convictions shape this approach.

1. First, simplification is not a one-off reform. It is an ongoing drive to ensure that the way the Commission works remains aligned with its priorities. As priorities and tools evolve, processes must adapt accordingly.
2. Second, the Commission must be an active driver of the change. Simplification cannot be delegated or left to emerge organically. It requires ownership, direction and continued attention at all levels.
3. Third, the fundamental change needed is how processes are designed and managed. Too often, additional steps and checks are added without removing existing ones. This practice needs to change to bring in a regular review of what is necessary and removing what no longer adds value.

The core aim is to free up time for staff to focus on what matters most.

Recommendation 1: simplify often, empower, take risks: renew our organisational culture (months 0-6)

With the right incentives and leadership orientations, the Commission can foster and introduce an open and trust-based organisational culture that values simplification.

This recommendation concerns the culture, leadership and ways of working of the Commission. The evidence is clear. In the 2025 Staff Survey, 77% of staff indicated that the Commission needs to change its ways of working. Only 48% considered that their DG has a culture that embraces change. Simplification is therefore not only a question of processes or technology. It is also a question of leadership, incentives and organisational culture.

Simplification should **not be treated as a one-off reform. It should become a continuous activity** embedded in the way the Commission is managed and organised.

Proposed solution

Empower staff and create a culture that supports simplification

Staff plays a decisive role in identifying areas for simplification, proposing improvements and implementing changes. However, the feedback received during the LSR process suggests that many factors currently work against the goal to simplify. The Commission has developed a degree of risk aversion that does not always encourage staff to challenge existing processes, suggest innovations or question unnecessary complexity. Improving processes is often not a priority and staff does not always feel empowered to propose alternative ways of working.

Several solutions are needed to empower staff and create a new culture, including (i) strong leadership support, (ii) visible recognition of simplification efforts and (iii) creating an environment in which staff is encouraged to identify improvements and test new approaches. Staff and teams that contribute to simplification should **be visibly recognised** through performance management, leadership communications, learning and development opportunities, career development and other recognition mechanisms. **Awards** can also help foster this new culture, e.g. awards for the most impactful simplification initiative, the most innovative use of digital tools for simplification or the best cross-departmental simplification project.

Clarify the roles of the management layers

The goal of simplification is not yet sufficiently embedded in governance, planning and reporting processes across the Commission. Responsibility for simplification is often unclear and efforts are uneven across services.

The current management set-up also adds complexity. **In many services, decision-making often involves multiple management layers**, including Directors-General (DG), deputy directors-general (DDG), directors, deputy directors, heads of unit, deputy heads of unit, heads of sector and team leaders. While each level has an important role, the overall structure can make it more difficult to drive and sustain simplification efforts.

For simplification to become a core management responsibility and implemented efficiently, each layer of management should have a clearly defined role and responsibility in the overall process.

- **Political leadership** should set the overall direction, specify that the goal of simplification is a strategic priority and provide the mandate for action across the Commission.
- **Senior management** plays a critical role in driving cultural change. Without their clear support, measures to simplify processes **are unlikely to succeed**. Senior managers should lead by example and promote simpler ways of working across their services. They should make the goal of simplification an ethos that guides how their departments operate.
- **Senior and middle management** should create an environment that encourages staff to question existing ways of working and to propose improvements. Simplification should become a continuous management responsibility rather than an occasional measure.
- **All levels of management** should be responsible for identifying opportunities for simplification, challenging unnecessary complexity. They should actively support simplification by creating space to question existing practices, test improvements and scale what works. They should also recognise teams that contribute to reducing unnecessary complexity and encourage a shift from simply applying the rules to ensuring they remain proportionate and fit for purpose over time.

International evidence points in the same direction. According to the OECD, 86% of surveyed countries have a specific minister or high-level official accountable for simplification, and 94% have a coordination mechanism in place. This supports the need for clear senior ownership and a permanent Commission structure to drive forward the goal of simplification.

Establish permanent structures to support simplification

To ensure that simplification becomes a continuous activity rather than a one-off reform, the Commission should create a permanent structure to drive and support simplification across the organisation. The new structure should comprise three bodies, as set out below.

1. Senior (or Chief) Simplification Officer

A Senior Simplification Officer should be appointed at DG or DDG level to lead the Commission's simplification agenda. This could either be a new position or added to an existing high-level function. The Senior Simplification Officer should report directly to the Secretary-General and the Corporate Management Board (CMB), provide strategic direction, monitor progress across the organisation and promote simplification as a corporate priority.

2. Process Improvement Centre

There is a clear need to strengthen process design and AI deployment in the Commission. To this end, a central 'Process Improvement Centre' to work on **process design and AI deployment** should be set up to support and assist DGs in identifying scope for simplification, in redesigning processes and implementing AI solutions where they add value. The Centre's work should follow a simple principle: processes should be simplified before technology is applied to them.

The Centre should:

- **Identify and drive simplification and AI opportunities** across the Commission.
- **Support AI adoption through common standards**, guidance and governance arrangements.
- **Provide expertise and support the DGs** in process redesign, automation and digital transformation; and help build capacity in related skills.
- **Measure results and monitor the impact** of simplification and AI initiatives using existing and new outcome-focused KPIs. Indeed, OECD evidence shows that only 57% of countries have assessed the effectiveness or efficiency of burden-reduction initiatives, underlining the importance of measuring results and avoiding purely symbolic action on simplification.
- **Maintain a Commission-wide 'simplification scoreboard'**, facilitate the sharing of practice inside the Commission and support the roll-out of successful initiatives across DGs.

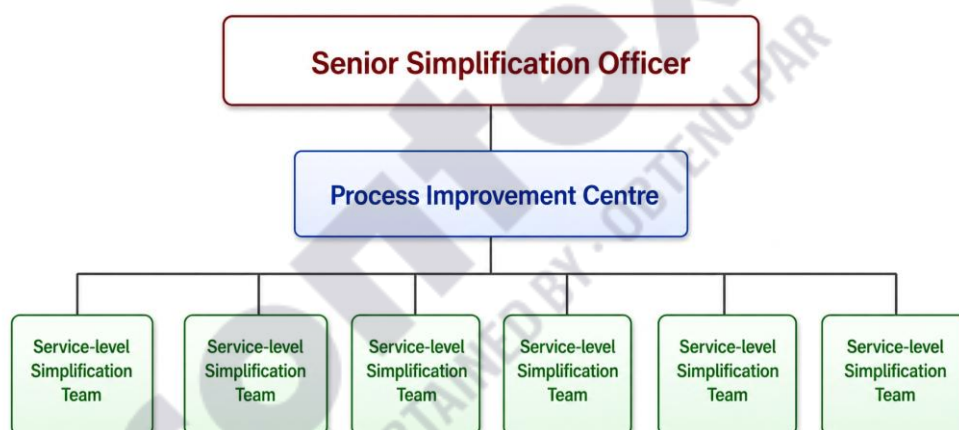
The Centre should be hosted by the Secretariat-General and **operate as a free service available to all DGs**. It should remain small and focused, with 10-15 staff and one manager. The team should bring together expertise in process engineering, modelling, change management, AI/automation, data management,

user experience and performance measurement. It can **function as a hub** and connect related expertise in other Commission departments, with the aim of drawing on this expertise to pursue the simplification agenda. The Centre should report to the Senior Simplification Officer.

3. Simplification teams

Each Commission department should create a small, cross-functional simplification team, tailored to its needs and tasked with identifying administrative burdens, proposing improvements and supporting their implementation.

The responsibility for these simplification teams, and their work more generally, **should be clearly assigned to the DDG or an equivalent senior manager in the DG or department**. This responsibility should sit at the highest management level, above the director or middle management level, to provide leadership accountability, clear ownership and to embed the goal of simplification in the governance. The Senior (or Chief) Simplification Officer should engage regularly with the DDGs to review progress, share good practices and support the work to implement simplification initiatives across the organisation.



Recommendation 2: break the briefing and validation chains and bring back proportionality (months 0-6)

The Commission would benefit, across the whole organisation, from reducing the number of approval steps to the minimum necessary. It should simplify validation chains by swiftly validating low-risk briefings, background notes and promote briefings generated directly by the user with, as well, clear feedback loops on content and use of briefings.

In BASIS, the number of briefings drafted for the Commission has remained relatively high, year after year: between 15-25 000 briefings each year, depending on the college cycle. In addition, thousands of additional briefings for senior management and other briefings are drafted and not registered in BASIS.

Briefing requesters (cabinets, senior management) are often unaware of the workload involved in preparing briefings. On their side, authors of briefings in

Commission departments often receive little or no feedback on use or even on the lines taken. In addition, briefing and validation workflows frequently include multiple standard approval steps, **regardless of the sensitivity or risk** of the file.

Proposed solution

Limit the volume of formal briefings

Formal briefings should only be written for Commissioners, Heads of Cabinets, the Secretary-General and Directors-General. Other needs should be covered through short notes or self-service briefings (see below). Reusable briefing material on recurring topics should be made readily available to reduce the need for new briefing requests.

Four eyes instead of 12

Validation requirements should reflect the sensitivity and risk of the file. Non-sensitive briefings and standard requests should follow a '4-eyes principle', involving the file handler and the line manager. Additional validation steps should only be required if justified by the nature of the file. There are already system-based validation workflows that demonstrate that shorter validation chains are feasible.

Tacit agreement

For set categories of documents, approval should be deemed granted if no comments are received within a given period. This would reduce unnecessary delays caused by documents remaining stuck in approval workflows.

AI-supported self-service briefings

Current AI tools, such as the *eBriefing* multilingual AI-based service, enable staff to prepare many briefings on a self-service basis by drawing on existing corporate knowledge and background material. Existing information, such as previous briefings, LTTs and other relevant material should be reused as much as possible to support the process of preparing first drafts.

Recommendation 3: heal self-inflicted administrative burden created by internal decisions: the Omnibus approach, a vehicle for simplification (starting in months 0-6)

Simplification measures need a practical 'vehicle' to bring ideas to fruition. The approach that the Commission uses to streamline and package rules for external users can also be applied to internal processes used by Commission staff. The 'Omnibus' method used to review groups of related rules and procedures together rather than tackling them individually could help identify, simplify or repeal those that no longer provide sufficient value.

The Commission operates within a legal framework established by EU legislation. It also creates a significant number of additional obligations **through its own internal decisions, rules and procedures**. The actual number is not known, although many interviewees estimated the range of internal rules in the thousand, to which should be added DG-specific procedures or similar additional rules.

In many cases, the Commission is the sole author of those rules, such as the Rules of Procedure and related implementing rules, guidance and instructions. Additional complexity can also arise from local practices and 'gold plating' within DGs, resulting in different ways of applying similar requirements across the organisation. This impacts all staff, particularly staff involved in administrative compliance and reporting activities, where multiple approval steps, validation chains and local procedures can create an unnecessary administrative burden.

The evidence is clear. The need to simplify these administrative processes is one of the most common themes raised in staff feedback, with staff frequently calling for fewer steps in approval chains and workflows and standardised processes across DGs to avoid 'reinventing the wheel'.

Proposed solution

One of the challenges has been the lack of a clear mechanism to tackle internal complexity systematically. The **Omnibus approach** is a good mechanism to use. It would involve grouping measures to simplify processes into thematic packages and reviewing related rules and processes together rather than case by case.

AI tools can support this work by scanning internal rules, procedures and guidance documents to identify any duplication, unnecessary approval steps and opportunities for simplification. **A pilot AI service to carry out these scans is already up and running** and being tested in the AI@EC network.

To implement this recommendation, the following actions should be taken:

Slicing the cake of internal rules into digestible parts

Given the wide diversity of internal rules and procedures, the Omnibus should be organised into thematic packages. Each package should focus on a specific area of administrative burden, led by one or several DGs.

The packages should prioritise areas with the highest potential for simplification and serve as pilots for wider application of the approach.

For example:

People & organisation

- Recruitment
- Appraisals

- Mobility and secondments
- Whistleblowing
- Hybrid working
- Creation and management of task forces and *ad hoc* groups

Operational processes & service delivery

- Validation and approval chains
- Missions and travel
- Internal approvals
- Service-level agreements (SLAs)
- Inter-service consultations
- Legislative coordination
- Briefings

Budget & procurement

- Financial procedures
- Procurement and grants
- Control frameworks

Digital transformation & information management

- AI deployment
- IT reporting
- Digital workplace tools
- Data and records management

External engagement & compliance

- Consultations and reporting obligations
- Impact assessments
- Interinstitutional relations

Omnibus examples of Quick Wins addressing local or other types of “gold plating”

In DG X, an additional report is required within the Strategic Planning and Programming cycle, complementing the Annual Activity Report (AAR). The report stems from an audit request and is prepared for internal use.

In DG Y, additional approval steps are introduced outside the corporate workflow system (e.g. via Ares) to obtain Cabinet agreement for actions that — under corporate rules — would not require Cabinet approval.

In DG Z and others, local mission guides introduce additional instructions on top of the corporate mission guide.

Many examples of internal gold plating such as these could be addressed through a single corporate decision or guidance, preventing the creation of local variants of corporate rules and guidelines.

As an additional example, privacy statement templates implementing Articles 15 and 16 of the EUDPR (Regulation (EU) 2018/1725) can go beyond the Regulation's minimum information requirements. While this enhanced transparency approach can support accountability and good administration, the added complexity is not always necessary for compliance with the right to information as defined in the Regulation. It also creates excessive workload for policy units — who must draft and maintain overly complex statements — as well as for Data Protection Coordinators, who may get drawn into lengthy

Simplification sprints

Once a thematic package has been identified (by a lead service and/or the Centre), a simplification sprint should be organised with the Centre involving the relevant services and subject-matter experts to review the process and identify the most effective opportunities for simplification.

A simplification sprint would typically last 1-3 days and combine process analysis with brainstorming to identify **practical simplification measures**. To assist the work, the AI tool currently being tested in the AI@EC network environment, as mentioned above, or a similar tool can be used.

Where appropriate, the proposed measures could then be tested in real or experimental conditions (see recommendation on sandboxes and controlled experimentation).

Methodology and rules for taking the Omnibus approach

Any review under the Omnibus approach should be guided by five principles:

1. Purpose

Rule: if there is no clear purpose, eliminate the rule.

2. User-centricity

Rule: define the level of complexity by user needs, not the organisation.

3. Proportionality and risk

Rule: checks should be proportionate to the level of risk.

4. Decision-making

Rule: the best decision level is the lowest level possible.

5. Sustainability

Rule: measures to simplify a process are only effective if they keep the process simple for a sustained period of time.

Recommendation 4: test ideas for simplification before scaling up and measure for success (months 6-18)

To simplify efficiently, the Commission could bring in structured and innovative ways of testing simplified versions of processes before applying changes more broadly. **As a result, simplification initiatives can move more quickly beyond the conceptual stages.**

Many internal processes are not high-risk and could be suitable for applying simplification measures directly, for example using the Omnibus approach described earlier. For other processes, however, simplification without testing may create risks.

Proposed solution

This recommendation can be implemented in two ways: (i) cost-effective virtual wind tunnels (i.e. simulations) and (ii) more formal sandboxes (i.e. controlled live testing). Both methods can be used to help identify where automation or AI support could add value. Not every wind-tunnel experiment will lead to a sandbox, and not every sandbox requires a prior wind-tunnel experiment. The right mechanism for each measure depends on the level of risk, the availability of process data and the need for real-life validation.

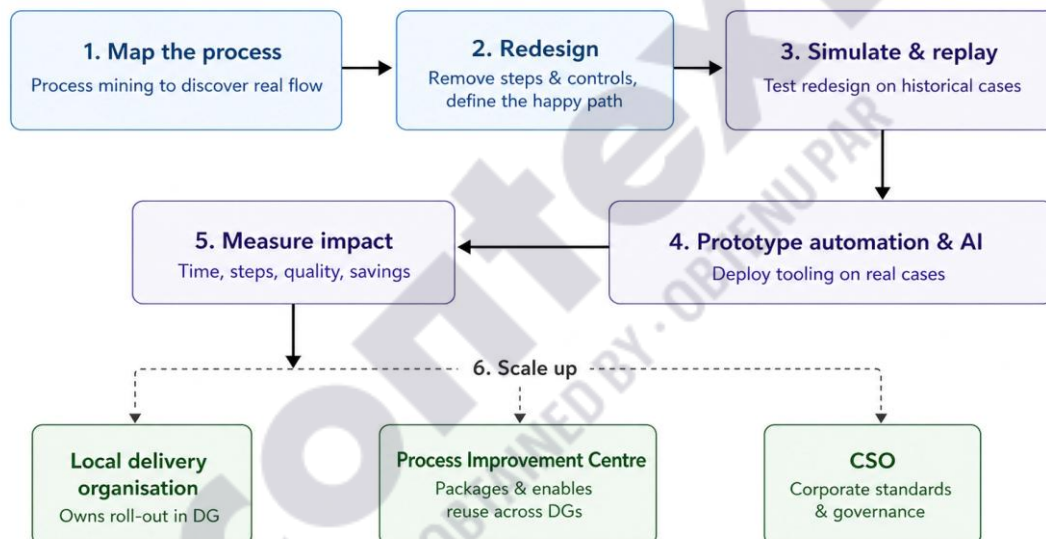
Wind tunnels

Just as aircraft or vehicle designs are tested in a wind tunnel before starting production, to avoid real-life testing — which can be prohibitively expensive — workflows can also be tested via process modelling before changes are made in

practice. It is a simulation, not a real-life pilot. The aim is to understand how an idea would work, e.g. if removing a step eliminates a bottleneck completely or transfers it elsewhere.

Taking the wind-tunnel approach means applying process mining to workflow data collected from IT systems. In practice, this means comparing and reconstructing – virtually, using computer modelling – how a process **actually runs, rather than how it's documented to run** and then look for divergences, compliance gaps or bottlenecks. These software systems (available also as open source) can 'replay' the sequences and add alternative options to test which changes would yield the best results.

For example, a DG, with support from the Centre, could simulate and compare different versions of an approval chain, such as fewer approvals, parallel validations, automated routing, risk-based checks or different workload allocation rules. The diagram below illustrates how this approach could be implemented:



Simplified process adapted at a scale — reusable across DGs and embedded in corporate standards

Sandboxes

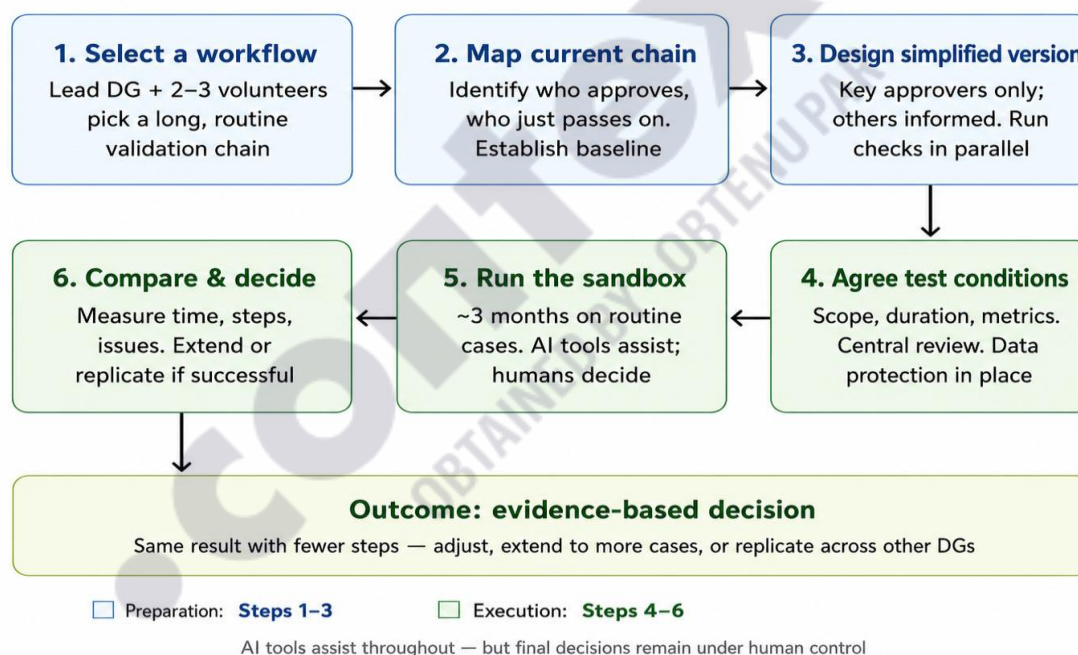
Sandboxes are suitable methods for when a simplified process needs testing in **real operating conditions before wider roll-out**. A sandbox is not a simulation: it is a controlled real-life test. It typically applies **light or adapted rules**, using real cases, users and real outcomes. The Commission is championing this approach to external stakeholders and Member States for product, process and service innovation. It should also be used to test ideas to simplify internal processes.

Rather than changing a process across the whole Commission at once, a sandbox enables a limited number of departments to test, for a limited period, whether the same objectives can be achieved with fewer steps, checks, validations or administrative burdens while maintaining appropriate safeguards.

In brief, sandboxes are learning opportunities where the Commission can assess, in a controlled way, whether to scale up a simplification measure. Sandboxes should be:

- time-limited;
- conducted within a defined scope and with a set number of departments;
- focused on processes where simplification measures require testing before wider implementation;
- operated in line with existing legal and data protection requirements;
- assessed against clearly defined objectives and measurable results;
- concluded with a decision to scale up, adjust, repeat or discontinue the simplified process.

The diagram below illustrates a typical sandbox cycle, from identification of an idea for simplification to testing, evaluation and scaling-up.



Measuring the impact of simplification

To understand whether a simplification measure is delivering results, progress should be measured at different levels. In this context, each measure should have a limited set of indicators to assess whether it delivers tangible improvements and is suitable for wider adoption. This is currently not sufficiently done across public administrations. According to OECD figures, only 57% of surveyed countries assess whether burden reduction initiatives actually work.

We propose a using KPI framework for simplification that covers the following main aspects:

Simplification KPI framework

Objectives, key performance indicators and measures

Objective	KPI	Measure
Reduce administrative complexity	Number of rules/procedures reviewed through the Omnibus approach	Number per year
	Number of simplification measures adopted through the Omnibus approach	Number per year
	Number of obsolete, duplicate or overlapping rules/procedures removed	% reduction
	Number of reporting obligations eliminated	Number / % reduction
	Number of forms, templates or document requirements eliminated	Number / % reduction
Simplify processes	Reduction in process steps	% reduction
	Reduction in approval/validation layers	% reduction
	Reduction in administrative touchpoints required to complete a procedure	% reduction
Accelerate delivery	Reduction in end-to-end processing time	% reduction
	Reduction in waiting time between approval stages	% reduction
Reduce user effort	Click-to-yes indicator	Reduction in the number of clicks required to complete a standard procedure
	Number of information requests eliminated	Number / % reduction
	Number of times information must be re-entered	Average per process
Re-focus human intervention	Human-in-the-loop share	% of transactions requiring human intervention
	Average number of human interventions per procedure	Number
Improve service quality	Staff satisfaction with simplified processes	Survey score
	User satisfaction with simplified services	Survey score

In addition to quantitative indicators, staff feedback, using simple online channels, can help assess whether simplification measures are reducing the administrative burden and improving the user experience. It can also help identify any cultural barriers to simplification, such as excessive risk aversion, unnecessary checks or reluctance to challenge existing processes.

Recommendation 5: simplify in smart ways – a risk-based approach with the internal control structures we already have as part of the solution (months 6-18)

As a smart, streamlined organisation with simplified processes, scrutiny of our routine and repetitive administrative tasks should be risk-based to reduce our workload and speed up delivery. The current internal control structures should also be part of the simplification process, along with their compliance role.

Today, too many internal Commission processes apply the same level of scrutiny, checks and validation to all cases, regardless of the level of risk, impact, complexity or sensitivity. OECD evidence suggests that disproportionate checks are a widespread problem for public administrations. In over two thirds of surveyed countries, permitting requirements are seen as disproportionate to the risks they address. Only around a third of OECD members require risk-based enforcement and inspections. It therefore suggested that the Commission moves to a more proportionate, risk-based model for internal administrative tasks.

Proposed solution

Roll out a simple risk-based approach that allows DGs to apply different levels of checks depending on the nature and level of risk involved. Routine and lower-risk cases could follow simplified workflows supported by AI tools under staff supervision. Higher-risk or more sensitive situations could also use AI-supported tools, but with stronger human review and oversight throughout the process.

The Internal Audit Service (IAS) risk criteria and methodology — taking account of operational, legal, financial and reputational risks in terms of likelihood and impact — can be embedded in this drive to move towards a risk-based approach.

This risk-based approach would allow staff to focus on politically sensitive issues or cases that require further assessment, rather than on applying the same level of review, validation and control to all cases, irrespective of risk. Similar approaches are already used in areas such as customs risk management, regulatory inspections and compliance monitoring where risk criteria, compliance data and predictive analysis help focus oversight on higher-risk situations.

The risk-based approach could be implemented through four simple steps:

1. Select a process

Identify a high-volume administrative process involving repetitive checks, reviews or verification activities.

2. Assess risk and complexity

Determine where different levels of risk justify different levels of review and checks.

3. Specify the operating model

Find the right balance between AI support, human review and escalation.

4. Test and refine

Apply the approach, supervised by staff (e.g. using the test models described in this report), evaluate the results and adjust the process where necessary.

The goal of simplification should also be integrated into the work and mandates of the Commission's governance, compliance and coordination structures. Bodies such as the Internal Audit Service (IAS), the Regulatory Scrutiny Board (RSB) and the Group of Resource Directors (GRD) should periodically review whether existing checks, validation requirements and administrative processes are still proportionate to the risks they are designed to address. These bodies should also help identify opportunities for simplification and coordinate their efforts with the Senior Simplification Officer and the Process Improvement Centre.

Regular fitness checks can be used to assess whether existing rules and procedures remain necessary, proportionate and fit for purpose. They could focus on identifying unnecessary administrative burden, friction points and process steps that create complexity for staff without contributing significantly to the intended objective. **In the OECD context, these are referred to as 'sludge audits'.**

In addition, evaluations or impact assessments can also focus on simplification as a **standard** feature.

Recommendation 6: reimagine the European public administration by using a mix of AI agents, 'one-click' services and simpler digital processes (months 18-36)

Reimagining public administration to be equipped for the future means that officials no longer spend the better part of the day reconciling the same information across disconnected systems, chasing signatures for routine approvals or putting together a paper trail that may be needed two years later for audits.

It would mean that AI agents assist, under the supervision of the official, by quietly checking eligibility, inconsistencies, producing first drafts or automating low-risk procedures. The need to navigate different systems used by different departments, with their own form and logic should become a thing of the past. Seamless workflows, visible end-to-end, should become the standard. Checks and accountability are not necessarily reduced; they are built into the process itself and only in well identified cases require manual work by the official.

Nevertheless, this approach requires care to streamline and simplify processes before introducing new technologies and automation on top of processes that no longer are fit for purpose.

Proposed solution

Digital simplification and modernisation

The Commission's IT landscape has become increasingly complex, with overlapping tools, sometimes poor user experience due to incompatible or overlapping tools, duplicated data entry and limited degrees of integration between key IT platforms. This increases the administrative burden, slows delivery and makes change more difficult.

Today, the Commission has 1 254 IT solutions (2025 figures) in decentralised governance structures. This reflects the findings of an OECD analysis, which identifies the main barriers to effective digital simplification as a lack of interoperability (54%) and outdated IT systems (31%). These findings support simpler approaches to the IT processes we use in the Commission.

Simplifying our IT environment is therefore essential. It is suggested to tackle this goal by using the Omnibus approach, with some concrete examples below of where we can start the work of digital simplification and modernisation.

- Ensure that the principles for financing and using different sources of funding are consistent across the Commission and explicitly include all departments or DGs that contribute to the functioning of the Commission.
- Improve interoperability, reinforce corporate IT governance to implement and monitor key interoperability principles across Commission systems

and reduce inconsistent use of corporate guidance/tools across DGs/departments.

- Ensure an IT enterprise architecture function to steer work on a more unified architecture for the Commission's digital landscape, in terms of business processes, data and technology. In this way, IT investments are assessed as steps towards a shared goal for the whole Commission, not in isolation.
- Simplify user experience and ensure that all IT systems and applications have a similar look and feel, e.g. the approval button is always in the lower right corner. Where possible, use intuitive 'no training required' principles when designing user interfaces.
- Reduce legacy systems: create targeted incentives for DGs to decommission obsolete or duplicative internal IT systems and replace them with fewer, simpler and more modern solutions. Draw up migration plans for departments to migrate from local/legacy IT tools to corporate solutions and KPIs to monitor technical debt and digital modernisation.
- Prioritise AI dimensions in future IT investments and use the Commission's leverage in public procurement to further EU sovereignty aspects of AI deployment and adoption.
- Migrate administrative processes to self-service workflows using AI agents and one-click tools, building on data and system interoperability.

IT Simplification KPI framework		
Objectives, key performance indicators and measures		
Objective	KPI	Measure
 Simplify IT systems	1 Number of applications/IT systems near (or past) end-of-life support	 Number
	2 % reduction of legacy application portfolio	 % reduction
	3 Number of duplicated solutions removed	 Number
	4 % of business processes covered by existing corporate solutions	 % coverage

Using AI agents and one-click tools

AI is increasingly able to support administrative processes through a combination of AI agents and AI-powered automated workflows. Staff should have access to AI assisting in navigating administrative procedures, retrieving information, interacting with corporate systems and performing routine tasks in a controlled and secure environment.

Another solution is to progressively make available structured and repeatable administrative processes as simple AI-powered services or 'one-click' tools that staff can use directly, needing little training. For example, to request a meeting room, interpretation, a transcript and multilingual translation in the same request or using simple one-click AI solutions to prepare replies to letters, summaries, briefings or reports.

The objective is not to automate everything at once, but to prioritise administrative tasks where automation can be most effective in reducing administrative burden, saving time and improving consistency.

AI agents are currently improving towards being able to interact with multiple tools and applications and to support users in performing complex tasks across different digital environments. This creates a range of opportunities for simplification, including:

- AI assistants that help staff navigate administrative procedures and answer practical questions;
- automated workflows for repetitive administrative tasks;
- reusing information that is already available in Commission systems to reduce duplicate data entry;
- smart forms that pre-fill, validate and route information automatically;
- AI-supported tools that help staff navigate complex rules and procedures;
- one-click services that perform routine tasks without requiring specialist knowledge or extensive training.

Since not all processes can be automated at once, the priority should be to focus on areas where **automation can deliver significant time savings** with limited risk.

DIGIT already provides the AI@EC platform as a corporate environment for developing AI applications, including AI agents and AI-powered automated workflows. This is a practical foundation on which broader adoption can build.

In addition, DGT in partnership with DG CONNECT provides AI-powered automated workflows ('one-click' tools), such as the Digital Europe AI-based multilingual services, supporting activities including translation, briefings, responding to complaints and parliamentary questions.

Similar approaches could be extended to other administrative processes. One example is the eReply service used by DGT and JUST to help staff handle complaints and letters from the public. Experience with this service has demonstrated that AI-supported routing can help identify the right lead service more quickly, reduce unnecessary discussions between departments and save time for staff involved in the process.

A major advantage of simple one-click tools is that staff **do not need to reach a certain threshold before starting to use them. They require little training; minutes rather than days. Staff can also begin to use the tools directly by feeding in information and background material available in authorised systems.**

Addressing the ‘once-only’ principle and other recurring administrative challenges

These tools can also help tackle long-standing challenges linked to the ‘once-only’ principle. Information already available in authorised systems should not need to be repeatedly provided by staff, applicants or other users. AI assistants and automated workflows can help retrieve, reuse and route information where authorised, reducing duplication and improving overall user experience.

As a first step, simple AI chatbots could help users find information and answers to practical questions. More advanced solutions could progressively support the reuse of information across administrative processes.

Implementation of these solutions should be built on the simplification measures described in the Omnibus approach. Where appropriate, they should be tested using sandboxes and controlled experiments before wider deployment.

Recommendation 7: make our data intelligent and change the way we search - improve corporate search and prepare AI-ready data (months 18-36)

The aim of this recommendation is to ensure that current search capabilities vastly improve and that users can be assisted by an AI agent or chatbot to drill down in detail and quickly provide the information sought. **The Commission's data landscape should become AI-ready, reusable and managed seamlessly to support the effective use of AI.**

Today, information is often dispersed across multiple systems, repositories and formats (e.g. ARES, DECIDE, EdIT, SharePoint), making it difficult to find, reuse and manage. AI applications increasingly depend on access to reliable, well-organised and accessible data. According to OECD evidence, 66% of surveyed member countries identify data quality as a major obstacle to the challenge of modernising the public administration.

Proposed solution

The Commission should improve corporate search functions and better organise its data and information to support AI-enabled services.

The first step in implementation is to identify high-value business processes and information assets that would benefit from AI, such as policy development, case management, public services, procurement or human resources. **Rather than attempting to transform all our data at once, the focus should be on improving a limited number of high priority use cases.**

This should be supported by a central data inventory and metadata catalogue that identifies where structured and unstructured information is held, who owns it and how it is used.

Data quality and AI readiness assessments should then be conducted to remedy duplication, missing information, inconsistent formats and outdated records. Common standards for metadata, document classification and data models should be rolled out across departments to improve interoperability.

For unstructured information such as reports, legislation, meeting records and policy documents, the Commission should progressively improve how information is organised, classified and searched. This would enable AI applications to retrieve and use relevant information from Commission sources and provide more accurate and reliable responses to searches for information.

Success can be measured through operational indicators such as:

- the percentage of priority datasets catalogued;
- data quality improvements;
- reuse of datasets across departments;
- the adoption of AI applications supported by trusted data sources; and
- improvements in search performance and information retrieval.

Future steps – new ways of working with data

Future developments in AI may further simplify how the Commission manages and accesses information. As AI systems become better at working with different types of structured and unstructured information, the focus could increasingly shift from organising information for individual systems to ensuring that information is accessible, AI-ready when needed, reliable, properly governed and available for reuse across the organisation.

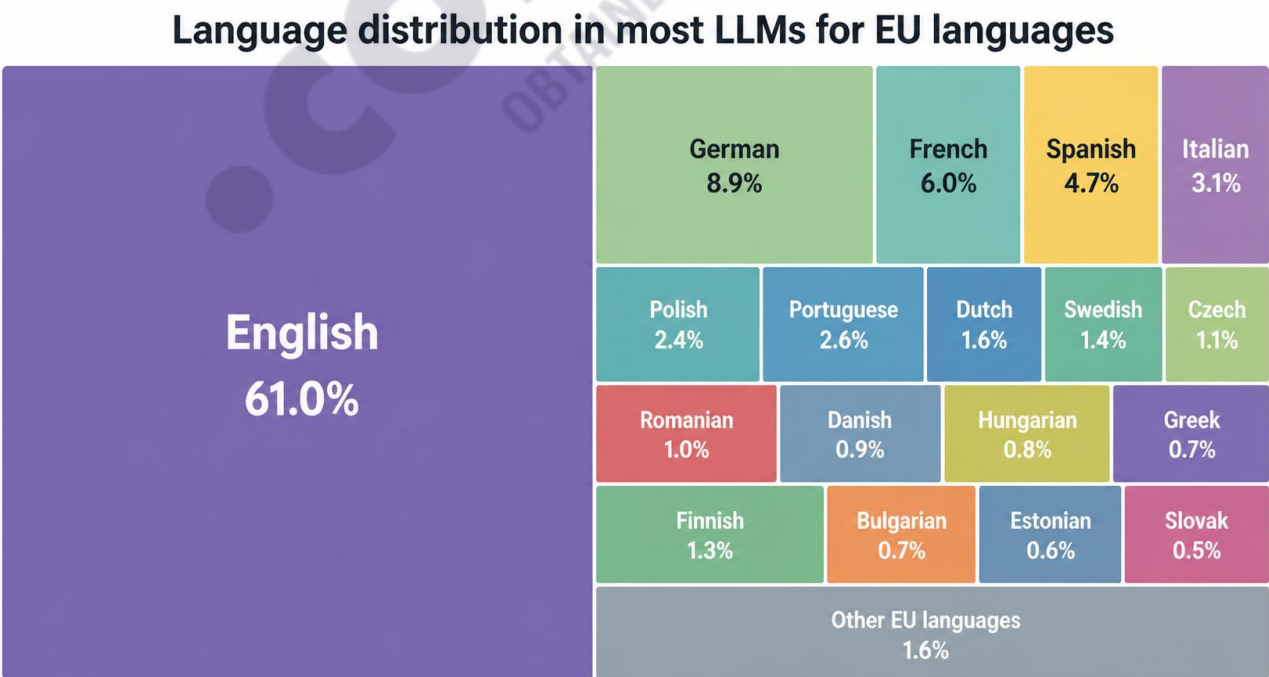
Recommendation 8: develop EU institutional LLMs that ‘think’ like an experienced EU official (months 18-36)

Imagine that, thanks to the work to simplify processes, staff have an experienced official in their given field assisting or always advising when drafting and performing administrative tasks. An AI helper that would, from the outset, be perfectly in line with corporate guidance, Commission style and incorporating all the current EU knowledge based on our own data – ‘thinking’ like an EU official.

The growing use of generative AI large language models (LLMs) across the Commission creates major opportunities for simplification but also raises strategic questions about quality, consistency, language coverage and technological dependence. Most LLMs currently available on the market are developed outside the EU. They are **not designed** to reflect EU legal reasoning, administrative practices, multilingual needs or public-sector values. Their performance in smaller EU official languages is also patchy.

As a result, staff may need to spend additional time adapting outputs, correcting terminology, aligning drafts with institutional standards or compensating for an external tool's limited understanding of our specific context. This reduces the benefits of simplification that AI could otherwise bring. **It also creates wider issues of sovereignty and long-term strategic dependence on non-EU technology.** Together with a general lack of larger European-based generative AI (with the exception of the EU company Mistral AI), it raises issues of reliance and reliability.

Language distribution in most LLMs for European languages looks like this:



Percentages are approximate and based on aggregated data from multiple sources.

Proposed solution

We currently have a small EU institutional LLM that is an open model, designed to be better at working in EU official languages, especially the least represented ones, than the current LLMs on the market. The model used was based on an open model from a European provider (Mistral AI). It is also currently used in the background to provide AI-based services such as e-Summary.

The next steps in developing the LLM for corporate and institutional purposes would combine several aspects such as multilingual capacity, values and sovereignty. **In practice this means training and building a specialised LLM that is designed from the outset to reflect the 'EU official/corporate mind', analysing and drafting in line with EU reasoning, EU values and EU style.**

An EU institutional LLM trained as an 'EU corporate mind' can bring significant simplification gains. It could, by default, analyse, reason and draft in line with the corporate guidance, which would reduce the need to explain to local systems explicitly what this means. These kind of "native" LLM capabilities are more powerful than prompt engineering or retrieval augmented generation.

To implement this suggestion, development can be carried out in-house. For instance, DGT together with DG CONNECT and JRC developed the capacity to conduct the complex processes involved in training LLMs and are working with European supercomputers under the EuroHPC programme to provide the computing power needed for such projects.

Ultimately, this shifts the burden from users having to 'explain the EU' to the AI. The AI would understand the context by design, making processes faster, more consistent and less prone to error.

Overall implementation roadmap

The Commission should launch a first wave of measures to produce quick wins that can deliver visible benefits of simplification within a short timeframe. The recommendations above are ordered with this in mind.

0-6 months

- Appoint Senior Simplification Officer
- Create simplification teams
- Identify and launch first Omnibus packages
- Set up the Process Improvement Centre
- Limit volumes of briefings and introduce the 'four-eyes-principle'

6-18 months

- Make the Process Improvement Centre operational
- Run simplification sprints
- Identify 1-3 sandbox or wind tunnels candidates per DG
- Launch AI-supported pilots in selected high-volume processes
- Publish a first simplification scoreboard alongside the first Commission Simplification Awards ceremony

18-36 months

- Scale up successful pilots
- Embed risk-based checks in selected workflows
- Deploy AI-enabled corporate search
- Scale up institutional 'EU official' inspired LLMs

Annex A: methodologies and roles related to recommendations

This annex sets out the proposed methodologies, implementation logic and governance roles linked to the recommendations in this report. Its purpose is to clarify how simplification initiatives should be designed, tested, governed and scaled across the Commission, and who should be responsible at each stage.

The methodologies described below are intended to ensure that simplification is implemented in a consistent, proportionate and measurable way across services. They should be applied flexibly depending on the nature of the process concerned, the level of risk involved, and the degree of organisational change required. Across all recommendations, five common methodological principles should apply:

1. **Simplify before digitalising or automating**
Technology, including AI, should not be used to automate unnecessary complexity. Processes should first be reviewed to remove obsolete, duplicative or disproportionate steps.
2. **Apply proportionality and risk-based design**
Controls, validations and human review should reflect the risk, complexity and sensitivity of the case, rather than being applied uniformly.
3. **Work iteratively**
Simplification should proceed through continuous improvement, small-scale testing, feedback and gradual scaling, rather than one-off large reform exercises.
4. **Use evidence and measurable indicators**
Simplification measures should be supported by process analysis, user feedback and operational indicators such as time saved, reduction in approval steps and reduction in manual interventions.
5. **Define ownership clearly**
Each simplification effort should have a clearly assigned owner at political, senior management, DG and operational level.

Roles and responsibilities related to the recommendations:

Role	Key role and recommendation reference
Political leadership	Sets the strategic direction and mandate for simplification (Rec. 1)
Secretary-General and CMB	Provide central oversight and ensure simplification is treated as a corporate priority (Rec. 1)
Senior management	Drives cultural change and promotes simpler ways of working across services (Rec. 1)
DG management	Identifies simplification opportunities, challenges unnecessary complexity and scales successful practices (Rec. 1, 3, 6)
DDGs / equivalent senior level	Holds responsibility for simplification within each DG or service (Rec. 1)
Senior Simplification Officer	Leads the Commission simplification agenda, monitors progress and reports to the Secretary-General and CMB (Rec. 1)
Process Improvement Centre	Supports process redesign, AI deployment, measurement and scale-up across recommendations (Rec. All except 8)
Simplification Teams	Identify burdens, propose improvements and support implementation within services (Rec. 1)
Staff	Identify friction points, suggest improvements and provide feedback on implementation and testing (Rec. 1, 4)
Lead DGs for Omnibus packages	Lead thematic reviews of related rules, procedures and burdens (Rec. 3)
Relevant services and subject-matter experts	Contribute expertise to simplification sprints and process reviews (Rec. 3)
IAS, RSB and GRD	Review whether controls and validation requirements remain proportionate and help identify simplification opportunities (Rec. 5)
Human reviewers / staff supervision	Provide oversight of AI-supported workflows, especially for higher-risk or sensitive cases (Rec. 5)
DGs running pilots	Test simplification measures through sandboxes and wind-tunnel experiments before wider deployment (Rec. 4)
Briefing requesters	Limit requests for formal briefings and use more proportionate alternatives where possible (Rec. 2)
File handlers and responsible managers	Apply the default “4-eyes” validation model for non-sensitive files (Rec. 2)
Data owners and information managers	Improve data quality, organisation, metadata and reuse of information (Rec. 7)
DGT, DG CONNECT, DIGIT and JRC	Contribute technical and computational capacity for institutional LLM development (Rec. 8)

Annex B: Background Analysis and Relevant Data

The workstream reviewed practices across approximately 20 Commission services (DGs). The analysis drew on workshops, interviews, discussions and questionnaires conducted with staff across services, and based on exchanges with AI experts.

Input was collected across DGs, including:

- examples of processes currently in use,
- how they are applied in practice,
- common patterns across DGs, including the accumulation of procedures, validation chains and reporting requirements over time.

A structured analysis was carried out on the basis of this input, including:

- assessment of proposed simplification measures,
- indicative time horizons for implementation (short, medium and long term),
- information needed to support implementation and monitoring.

The workstream developed and analysed a set of problem-based fiches, covering:

- the current situation and problem definition,
- stakeholders affected and frequency,
- the desired outcome and expected simplification impact,
- possible implementation pathways and time horizon,
- the role of data, digital tools and AI.

The analysis covered several dimensions, including:

- process design and validation chains,
- organisational aspects and capabilities,
- cultural and behavioural factors,
- the use of technology and AI.

The recommendations and draft report were enriched with this consolidated analysis.

Executive summary Financial management

Problem statement

The European Union's ability to mobilise, allocate and steward financial resources swiftly and efficiently is a cornerstone of its capacity to deliver on the Union's strategic priorities. However, the new geopolitical and economic challenges, mounting fiscal pressures and the scale of investment needs call for a financial ecosystem that is fit for purpose. Currently, a series of challenges in delivering the budget such as organisational inertia, fragmentation, and technological gaps are impeding the EU's ability to fully leverage its budget for maximum policy impact. Next to this, the next multiannual financial framework (MFF) will profoundly reshape the architecture of the EU budget, requiring a fundamental rethink of how the Commission implements it. This presents an opportunity to transform financial management into a strategic catalyst that converts political priorities into meaningful outcomes across the EU and beyond. At the same time, rapid advancements in Artificial Intelligence (AI) offer unprecedented opportunities to boost efficiency, accuracy, and compliance in implementing the EU budget. While already leveraging AI to transform financial management, the Commission still needs to establish a coherent strategy, risking piecemeal adoption and missed opportunities for modernisation.

These challenges cannot be solved by incremental tweaks alone. They require a comprehensive transformation of the entire financial management value chain – from programming and implementation to audit, control and financial reporting.

Recommendations

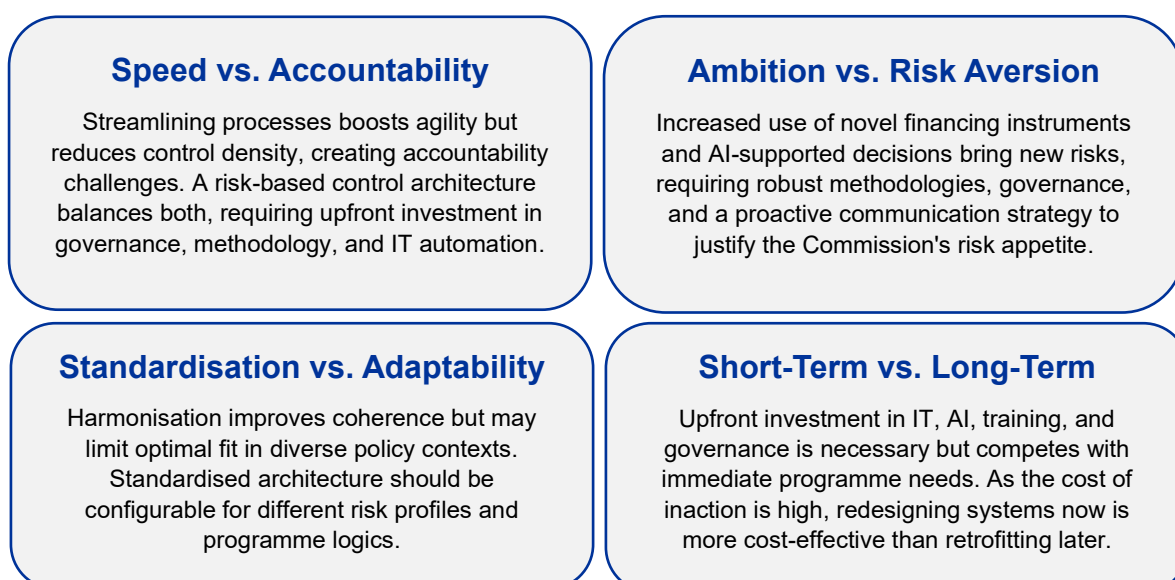
Our vision is a flexible, integrated and AI-enabled financial ecosystem that directs EU spending strategically to the areas where Union action is most needed, while upholding the highest standards of accountability, transparency and trust. Within this ecosystem, colleagues will work with seamlessly integrated tools and processes that provide real-time, AI-assisted financial intelligence across the whole value chain, enabling swift, evidence-based decision-making throughout the organisation.

Transformation does not happen by itself. It needs the right foundation. We have identified two key enablers: without them, nothing else will stick. First, we need a robust yet agile governance to ensure coordinated action and accountability. Second, we need colleagues at all levels with the specialised skills and expertise for the next MFF and deployment of AI, particularly in critical areas such as programming, audit, control and risk management – capabilities in which the Commission needs to significantly invest (see Annex 2). To achieve this under

the framework of the current Financial Regulation, we propose six strategic recommendations - informed by a comprehensive consultation process (see Annex 1). A prioritisation framework complements this review (see Annex 3).

01 Boost the EU financial toolbox	02 Strengthen our leverage with implementing partners	03 Transform financial management processes to support a more agile EU budget
Enhance grants, procurement, and alternative funding instruments to maximise policy impact. Leverage technology and AI to improve efficiency and ensure strategic alignment.	Promote a more comprehensive approach to funding, establish a centralised coordination framework, and deploy advanced IT tools.	Adopt agile processes and digital workflows for financing decisions, simplify financial arrangements across DGs, and move towards leaner, automated and AI-enabled financial circuits.
04 Ensure MFF readiness with robust control and risk management frameworks	05 Integrate internal financial reporting to drive organisational performance	06 Harness the potential of AI in financial management
Shift towards an AI-enabled, harmonised, and objective-driven control framework, develop a more strategic and effective risk management and oversight for the EU's financial operations, and implement a single audit approach effectively.	Develop a unified reporting infrastructure, ensure high-quality and interoperable data, and refresh the key performance indicators (KPI) framework to drive organisational performance and accountability.	Establish a strong foundation for AI adoption in financial management, develop effective governance and oversight, invest strategically in AI-powered projects, and promote a data-driven culture with the necessary skills.

These interconnected recommendations contain inherent tensions that decision-makers will need to balance:



Recommendations on financial management

Our vision is a flexible, integrated and AI-enabled financial ecosystem that directs EU spending strategically to the areas where Union action is most needed, while upholding the highest standards of accountability, transparency and trust. Within this ecosystem, colleagues will work with seamlessly integrated tools and processes that provide real-time, AI-assisted financial intelligence across the whole value chain, enabling swift, evidence-based decision-making throughout the organisation.

Recommendation 1: Boost the EU financial toolbox

Efficiently mobilising, allocating, and stewarding financial resources is key to the EU's ability to achieve its strategic priorities. A well-designed and deployed financial toolbox – spanning grants, procurement, and alternative funding instruments – is essential to translate policy ambitions into tangible outcomes across the EU and beyond.

Problem statement

Currently, a series of challenges affects the effective design and deployment of funding instruments, limiting the EU's ability to maximise policy impact. These barriers encompass a range of issues, including organisational inertia in the selection of funding instruments, multiple forms of fragmentation, gaps in technological capacity, and untapped potential in alternative funding instruments.

Proposed solution

To overcome these obstacles, we propose three interconnected actions across grants, procurement, and alternative funding instruments. Together, they aim to build a more targeted, flexible, and intelligent financial ecosystem. Technology, including AI, should act as a key enabler throughout. The ultimate goal is to unlock the full potential of EU funding and drive transformative impacts across key policy areas.

Sub-recommendation 1.1: Leverage grants to better achieve policy goals

Grants are a central tool for delivering policy but are likely to evolve in the next MFF with new models, more agile selection routes and greater use in combination with financial instruments and budgetary guarantees. Greater effectiveness requires a more **impact-focused, smarter and technology-enabled approach**

throughout the entire grants' lifecycle – from work programme and call design to implementation and feedback loop into policymaking.

Increased focus on strategic priorities and greater flexibility

We recommend improving grant management at the corporate level to ensure greater strategic alignment, adaptability, and maximum relevance, effectiveness and impact. Five essential levers can drive this transformation:

- **steer strategy coherence across funding programmes** to avoid fragmentation and duplication as well as to ensure continuity of funding along the innovation path ('from research to market') or across policy priorities.
- ensure EU funding delivers maximum impact in support of **strategically chosen policy objectives** by designing calls that address specific, high-impact policy goals.
- prioritise grants with **specific, measurable outcomes, using financing not linked to costs** (FNLC).
- make funding agile and responsive through **multiannual calls with flexible sub-components** to adapt to changing circumstances and policy priorities.
- increase programme and project flexibility and adaptability by enabling **adjustments to design and implementation throughout the lifecycle**, allowing for timely responses to emerging challenges and opportunities (e.g. top-ups).

Smarter grant process

To enhance the efficiency, effectiveness, and impact of grant management, we recommend a strategic approach that **streamlines processes, leverages technology, and simplifies administrative procedures** while maintaining robust risk management. By focusing on process standardisation, data-driven decision-making, and risk mitigation, the EU can align grant management with policy goals, reduce bureaucratic burdens, and maximise value for both the Commission and beneficiaries.

The following recommendations provide actionable steps to achieve these objectives.

- **Streamline and standardise current grant processes** across all programmes to improve speed, quality, and cost-effectiveness. For

example, in cases with high volumes of applications, consider a two-stage application process or random pre-selection of projects.

- **Leverage data, technology, and AI** to boost efficiency and effectiveness by:
 - Upgrading eGrants to support new grant types, contribution agreements, templates, and workflows, as well as flexible evaluation procedures, performance reporting, and automated financing not linked to costs payments;
 - Using eGrants for applications, reviews, and reporting;
 - Deploying AI to support and automate key stages of the evaluation and monitoring process, including application reviews (admissibility, eligibility, and ethics checks), conflict of interest and ownership checks, drafting and quality control of evaluation and post-evaluation reports, facilitation of consensus, financial and compliance analysis, redress case assessment, and impact tracking across projects and portfolios;
 - Establishing a robust data and performance monitoring framework: high-quality data, easier access to data and robust data analytics by policy area should inform grant design, monitoring and evaluation in line with initiatives such as the Single Digital Gateway and the Performance Regulation.
- **Boost simplification** for faster delivery, in particular:
 - streamline application processes to reduce administrative burden on applicants by minimising prescriptive requirements and focusing only on essential information, thereby avoiding gold plating;
 - simplify internal decision-making, including by further streamlining the Common Model Grant Agreement and limiting the possibility to renegotiate grants after submission (e.g. capped thresholds);
 - accelerate contracting by expanding the use of framework partnership agreements for repetitive actions.
- **Adopt a more structured approach to risk management** by strengthening *ex ante* financial viability assessments and expanding the use of existing insurance mechanisms, such as the Mutual Insurance Mechanism, to accelerate grant agreement preparation and facilitate implementation in cases of beneficiary insolvency.

Sub-recommendation 1.2: Harness expertise, data and technology to power policy-driven procurement

Procurement must become a stronger strategic policy instrument capable of delivering on the EU's ambitions in high-priority sectors like space, defence, health, and digitalisation - areas characterised by increasing scale and complexity. Innovation-driven approaches like pre-competitive procurement can accelerate technological breakthroughs.

To boost its effectiveness, we need stronger internal coordination, collaboration, and capacity, alongside timely upgrades to the eProcurement Tool Suite. Two key enablers are essential: (i) a dedicated **Centre of Excellence** to pool expertise and (ii) a fit-for-purpose **digital solution**. Together, they will transform policy-driven procurement into a high-performing, coherent policy instrument.

Create a Centre of Excellence for policy-driven procurement

Policy-driven procurement demands specialised expertise that is currently unevenly distributed across Commission departments. A Centre of Excellence for policy-driven procurement would address this by serving as a single hub for consolidating and sharing the skills needed to select, prepare, and manage appropriate procurement processes. This includes innovative and joint procurement in line with policy objectives.

Strengthen eProcurement governance and accelerate its development

Efficient procurement requires robust digital infrastructure. Currently, the incomplete eProcurement Suite hampers process speed, transparency, and scalability while limiting AI application development. There is an urgent need to strengthen eProcurement governance so that it fully supports business needs and to invest in its evolution towards a next-generation AI-enabled IT solution capable of meeting the demands of the next MFF.

Sub-recommendation 1.3: Embrace alternative funding instruments

Beyond traditional grants and procurement, other funding instruments such as equity, 'contracts for difference', loans, and guarantees are essential to maximise budgetary impact and sustain innovation. While growing, these instruments still represent a modest share of EU funding. To crowd in private and institutional investment at scale and support high-risk initiatives, dedicated delivery mechanisms and operational frameworks are needed.

We recommend creating a **corporate framework for the design and the deployment** of such funding instruments, featuring a core team and standardised rules, procedures and guidelines. This would ensure alignment with policy objectives and risk appetite, while promoting transparent, accountable and efficient implementation. By expanding beyond current instruments and developing innovative solutions, the Commission can deliver on its policy objectives more effectively through a framework adapted to its unique institutional role. The framework should cover the following non exhaustive aspects:

- **Effective steering and oversight:** Roles and responsibilities between authorising officers across Commission departments, central departments and the Chief Risk Officer should be reviewed to ensure clear information flows and decision-making responsibilities, while fully respecting the role and responsibility of authorising officers. This structured approach, combined with close collaboration between the actors concerned, will ensure efficient implementation while maintaining flexibility to address specific policy needs.
- **Standardised and modular financial toolbox:** While recognising the need for tailored products, we should standardise wherever possible to ensure consistency. To this end, comprehensive guidance for designing and deploying financial instruments, budgetary guarantees, and assistance measures should be developed. This should include:
 - Commission-backed equity vehicles (building on existing pilots) and specific loan instruments with independent, professional governance;
 - risk-sharing arrangements to attract private and institutional co-investment;
 - mechanisms for long-term capital recycling in strategic sectors.

These instruments would be modular and adaptable to policy objectives, but based on common contractual structures and risk parameters enabling comparability and aggregation of risks at portfolio level (see Recommendation 4).

- **Documentation and reporting:** Develop standardised templates and guidelines for funding instruments and contractual documents, tailored to each instrument type while providing a coherent performance and accounting picture. Establish streamlined and consistent reporting requirements that focus on essential performance metrics, enable rapid information access, support agile adaptation when needed.
- **Monitoring and evaluation:** Establish proportionate and coherent monitoring and evaluation frameworks for financial instruments and budgetary guarantees, featuring tailored reporting mechanisms and KPI-based performance tracking.

- **Skills:** In-house expertise should be developed further to manage innovative funding approaches like equity (see Annex 2).

Recommendation 2: Strengthen our leverage with implementing partners

Partnerships already play a central role in delivering the EU budget. These partnerships enable the EU to leverage resources, expertise, and local knowledge, ensuring that funds are used efficiently and effectively. Indirect management is set to grow even further in the next MFF, driven by the need for innovative funding instruments and increased leverage through private, institutional and national funds.

Problem statement

The EU's relationships with partners implementing funds in indirect management are currently marked by a relatively fragmented funding framework. A diverse set of partners implements a wide range of programmes and instruments, each with different contractual arrangements and reporting requirements. This can complicate the effective allocation of resources and generate an undue administrative burden for both the EU and its partners. It may also undermine the EU's position vis-à-vis implementing partners and limit accessibility for new entrants.

Proposed solution

To unlock the full potential of EU partnerships, we propose a strategic framework to enhance our leverage with implementing partners. Our recommendations focus on three key areas:

Sub-recommendation 2.1: Promote a more comprehensive approach to funding

This involves a more comprehensive and sustainable approach to funding through complementary measures:

- **Larger contracts** can reduce administrative burden and enable more effective programme implementation. Within these larger contracts, partnerships and sub-granting would allow working with smaller-scale partners in strategic areas (for example civil society organisations, local organisations) where relevant.
- **Multiannuality** can offer greater stability and predictability to plan and execute projects more effectively.

- **Top-ups based on implementation success** can incentivise partners to deliver even better results and ensure that funding is allocated efficiently. If success is low, funding should be quickly reallocated to successful actions needing more funding.
- **Revolving funds with key partners**, combined with a carefully calibrated initial level, could help to leverage blended financing, where a combination of public and private funds support projects, and ensure a more efficient use of resources.

Sub-recommendation 2.2: Centralise coordination and standardise processes

We recommend establishing a central coordination function within the Commission to drive a unified and integrated approach to programme implementation in indirect management. This function would serve two key purposes:

- **Standardise and streamline processes** across the organisation by revising instructions on pillar assessments, standardising templates for contribution agreements, and harmonising costs, reporting requirements, and EU visibility requirements across implementing partners.
- Develop **innovative products and processes** for expanding the Commission toolbox where needed.

To maximise impact, the central coordination function should be complemented by **dedicated negotiation teams**. Operating as a bridge between the central coordination unit and lead departments, these teams would support Authorising Officers in negotiating contribution agreements while ensuring continuity, stability, and consistency throughout the process. This approach eliminates the current fragmentation where implementing partners face multiple negotiation teams with varying approaches across departments and use this to their advantage. By standardising procedures, ensuring consistent rule application, and facilitating stakeholder communication, these teams will promote more collaborative and integrated implementation. Their unified structure will also boost risk management, improve oversight, reduce errors, and strengthen credibility vis-à-vis partners.

Sub-recommendation 2.3: Deploy eGrants as a corporate IT tool for indirect management

Improving indirect management requires a comprehensive overhaul of the related IT tools and digital infrastructure. A **single corporate IT system** should integrate all indirect management activities across funding programmes, enabling real-time monitoring, streamlined reporting, and improved data analytics. Developing and

implementing advanced communication tools and platforms will facilitate the seamless exchange of information with stakeholders. A unified data management framework should ensure consistency, accuracy, and completeness of programme data, enabling informed decision-making and effective programme evaluation and accounting.

IT tools and systems should be intuitive and tailored to the needs of programme managers, implementing partners, and other stakeholders, reduce the administrative burden and increase overall efficiency. AI-supported chatbots would be developed to make the IT tool even more user friendly and adapted to specific needs. The IT infrastructure should be scalable and flexible, allowing for easy adaptation to evolving programme needs, AI integration, new funding opportunities, and changing regulatory requirements.

eGrants, as the existing digital corporate tool for grant management, has the potential to support many of these improvements (centralised management, streamlined reporting, basic data analytics and communication with stakeholders). However, it would most likely require significant improvements and integration with other systems to fully meet all the described needs, including AI integration and advanced data analytics.

Recommendation 3: Transform financial management processes to support a more agile EU budget

The proposed comprehensive redesign of the EU budget, centred on greater streamlining, flexibility and impact, responds to a strategic imperative. That imperative is to equip the EU with the flexibility needed to act swiftly in response to unforeseen circumstances or emerging policy priorities. This demands that the Commission's financial management processes be not only fast and intelligent, but also adaptable to evolving policy needs.

Problem statement

Against this backdrop, several critical areas need improvement, in particular the protracted decision-making process for financing and work-programme approvals, and the overly complex financial arrangements between departments. Furthermore, current financial circuits often involve unnecessary actors beyond those designated by the Financial Regulation and fail to consistently apply cost-effectiveness principles. Certain spending categories and departments still bypass corporate systems like eGrants and eProcurement, missing opportunities for automation and integrated checks.

Emerging technologies, including AI, show great potential to transform financial management processes. However, these technologies currently remain

somewhat unexplored and limited in scope. Only a few instances of AI use have been identified as already being implemented or planned to reinforce human judgement for financial and operational checks. Despite ongoing experiments and initiatives, the path to scaling and integrating successful use cases at the corporate level remains unclear.

Proposed solution

We recommend building financial processes that are leaner, more agile and technology-enabled while preserving a high level of assurance.

Sub-recommendation 3.1: Develop agile processes and digital workflows for Financing Decisions and Work Programmes

To maximise the flexibility potential offered by the next MFF while reducing administrative burden, the **guidance and templates** for financing decisions (FD) and work programmes (WP) should be updated to minimise post-adoption substantial amendments and streamline approval processes. The revision should cover amongst others:

- **Clear governance** for multi-departmental programmes, with defined leadership and arbitration arrangements;
- **Enhanced flexibility** mechanisms such as the use of multiannual WPs, the possibility of conducting parallel amendments to FDs and WPs and the adaptation of the flexibility clause in FDs to future MFF flexibility arrangements;
- **Simplification** such as limiting the content to what is strictly legally required for adoption.

The drafting and adoption of FDs and WPs should also be streamlined and digitalised to reduce fragmentation and enable faster preparation and adoption across all programmes. To this end, a single and user-friendly integrated IT tool should be deployed to support the full lifecycle of FDs and WPs, from drafting and inter-service coordination to validation, adoption, amendments and implementation monitoring. This corporate IT tool should benefit from AI-enabled functionalities such as pre-filled templates, automated compliance checks, and structured data capture for reporting and monitoring.

Budget implementation should discourage inefficient end-of-period spending, be underpinned by better programming and forecasting, and allow for the timely reallocation of unused budget.

Sub-recommendation 3.2: Simplify financial arrangements across departments

We recommend streamlining **inter-departmental arrangements** by simplifying and increasing the transparency of the chargeback process, reducing the number of transfers and internal billing transactions, making budget reallocations clearer, ensuring stable funding for corporate activities, and maintaining budgetary cooperation between departments where it adds value. Key measures to support this objective include:

- Central departments and lead departments should fund corporate services directly through **upfront allocations** in the annual budget and multiannual contributions;
- The Commission should **simplify funding for the JRC's** competitive activities, using clear arrangements and transfers instead of internal invoices;
- Central services, together with PMO, should assess the possibility of **managing certain parts of the global envelope centrally**, such as missions or experts' reimbursement, without use of co-delegations, using MIPS and AGM to track allocations by department;
- **Budget delegation rules should be clarified**, with a simple template for written agreements between departments, focusing on actions to be implemented and reducing administrative burden.

Sub-recommendation 3.3: Move towards leaner, automated and AI-enabled financial circuits

Ahead of the next MFF, all Commission departments should align their financial circuits with the governance framework for the next MFF and DG BUDG's latest guidelines for authorising officers by sub-delegation. The goal is simple: the right actors should do the right checks at the right level of risk. Central departments will play a key role in promoting a consistent approach to financial circuits across departments, particularly for low-risk transactions.

All spending categories should, to the maximum extent possible, be systematically **onboarded to corporate IT systems**, such as eGrants or eProcurement, as these tools offer significant advantages such as standardisation of key control steps. To deliver this action, relevant IT developments should be prioritised at corporate level.

Emerging technologies, including AI, represent a strategic opportunity to fundamentally transform financial management, support financing decisions, and improve the efficiency of financial circuits. **Automated processes and AI**

solutions should be integrated into corporate IT systems to streamline workflows, enhance data analysis, and optimise operational and financial checks, throughout the entire project implementation cycle. To unlock this potential systematically, the work plans for each corporate IT system for financial management should identify concrete use cases and provide the necessary funding (see also recommendation 6).

Recommendation 4: Ensure MFF readiness with robust control and risk management frameworks

The next MFF will reshape the EU's financial architecture, requiring a fundamental review of control frameworks to maintain reasonable assurance. While fewer programmes simplify the structure, they amplify the importance of each instrument, making assurance failures more impactful. To support effective programme implementation while ensuring budget protection and reducing administrative burden, control frameworks for next MFF programmes must be fully operational from the outset.

Next to this, the significant increase in the EU's financial operations over recent years has heightened the exposure of the EU budget to contingent liabilities. In the next MFF, the Commission has proposed to increase the ceiling for budgetary guarantees and loans to third countries. The increased financial risk and potential externalities on the EU budget call for more robust corporate oversight over budgetary guarantees and loan activities.

Problem statement

The proposed transition to objective-based delivery represents a fundamental shift, as funding increasingly depends on the fulfilment of milestones and targets rather than on traditional eligibility checks based on real costs. This requires new control and audit approaches focused on verification of management and control systems and of outcomes. Existing methodologies within the Commission reflect the current funding programmes and are therefore not fully fit for purpose.

Furthermore, the expanded use of budgetary guarantees and loans to third countries – particularly innovative ones – also requires a robust risk management framework at the corporate level for managing contingent liabilities, covering credit, market, and operational risks. Currently, risk frameworks applied across diverse implementing partners are fragmented, impacting the visibility over portfolio-wide exposures. This fragmentation complicates governance, risk management, and monitoring, leading to possible inconsistent provisioning.

Additionally, efforts are needed to further standardise reporting data in order to support future requirements for consolidation, effective risk oversight and coherent reporting. Corporate tools designed to provide an aggregated risk view or enable automated data analysis and advanced risk analytics are currently under development.

Next to this, AI fundamentally alters how controls and risk management can be designed, implemented, and monitored. This requires a move from reactive to proactive controls, as AI enables real-time monitoring and predictive analytics, allowing for early detection of risks and deviations from planned outcomes. AI also improves risk-based auditing by assisting in risk stratification, which helps auditors prioritise high-risk areas for deeper scrutiny. Furthermore, AI-driven controls can help to dynamically adjust implementation or provisioning in real time to changing conditions, such as geopolitical risks affecting third country guarantees or shifts in project implementation. AI also integrates with data-driven decision-making, enabling predictive modelling to forecast potential risks, such as delays in achievement of milestones or targets.

Finally, critical capabilities – including audit and risk management skills for new funding instruments, AI-assisted controls, and structured knowledge transfer – are currently not available at the necessary scale. Establishing control, risk management and accounting frameworks too late or inadequately could therefore become not just a technical gap, but a strategic vulnerability.

Proposed solution

We envision a future-proof EU financial management that combines modern and intelligent controls, strategic risk management and oversight of EU financial operations, and effective implementation of the single audit principle to deliver greater efficiency, accountability, and impact.

Sub-recommendation 4.1: Shift towards AI-enabled, harmonised and objective-driven control framework and strategies

To align with the next MFF's new features, particularly objective-based delivery and conditionality, and to enhance efficiency through AI integration in control activities, we recommend a comprehensive review and update of the Commission's corporate internal control framework. In parallel, **robust control strategies for EU funding programmes** should be developed well in advance of the next MFF's start date.

Internal control mechanisms should evolve beyond traditional compliance-based approaches. This shift is necessary to better align with the growing emphasis on policy delivery, performance, and results as well as to incorporate the use of AI in supporting budget implementation. As such, this should include a comprehensive evaluation of the Commission's existing control framework, covering internal control policies, procedures, and guidelines to ensure they remain fit for purpose in the evolving landscape.

This assessment should identify areas – funding instruments, management modes, types of controls or the support from AI in line with the AI governance framework (see recommendation 6) – where the mechanisms implementing the control framework need to be strengthened or adapted to ensure that they are effective in preventing fraud, corruption, and other irregularities, and that they provide reasonable assurance that EU funds are used in line with the EU policies and objectives, and rules on legality and regularity.

In particular, we recommend that:

- **Control objectives** by management mode are reviewed, including the balance between ex ante and ex post controls;
- **Common control strategies** for the same type of funding instrument are developed, including adequate recovery mechanisms, ensuring consistency across programmes;
- For **objective-based instruments**:
 - The methodological framework for defining and costing of milestones and targets is being strengthened while developing consistent methodologies to assess the reasonableness and plausibility of cost estimates and to ensure that these estimates reflect implementation realities.
 - Alternative approaches to traditional error rates are developed, building on experience with similar instruments under the current MFF.

Sub-recommendation 4.2: Develop a more strategic and effective risk management and oversight for the Union's financial operations

The Commission's future risk landscape is likely to become more complex and to remain volatile. For instance, the expansion of budgetary guarantees – both within and beyond the EU – and loans to third countries creates contingent liabilities demanding rigorous oversight, particularly as third-country guarantees may face rapidly evolving geopolitical and sovereign risks. Additionally, greater reliance on implementing partners and national systems under indirect and shared management necessitates comprehensive assessment of the entire assurance chain's reliability.

Risk management of the EU's financial operations should become a forward-looking governance tool that actively supports decision-making and budget implementation while reflecting the EU's diverse financial exposure and its policy priorities. This requires a corporate risk management framework adapted to the Commission's unique institutional role. This should be aligned with the Commission's risk tolerance, with common tools and risk assessment methodologies across funding programmes.

Key elements of this framework should include:

- **Differentiated approach towards risk:** this framework must distinguish between different instruments and risk profiles, also between guarantees for actions within and outside the EU, which present significant variations in risk levels, data availability, policy objectives, and legal environment. Recalibrating risk-sharing parameters – including access conditions – and encouraging implementing partners to pursue higher-risk, higher-reward measures would significantly boost opportunities for private and institutional co-investment. Such adjustments should be grounded in a thorough assessment of existing controls, evaluating what is in place and its continuing effectiveness, drawing on evidence from established practices. The approach should strike an appropriate balance between flexibility and control and resulting budget protection. Benchmarks from institutions like the International Monetary Fund and the World Bank Group could provide valuable guidance in developing this comprehensive risk management framework;
- **Robust provisioning management:** rigorous provisioning controls are required to maximise budget efficiency by continuously optimising provisioning levels based on risk, preventing idle funds staying with implementing partners and enabling rapid reallocation of resources;
- **Data and advanced analytics:** this framework should also pave the way for automated data ingestion and analysis through standardised data structures, laying the groundwork for advanced risk analytics. Over time,

this will enable the integration of digital and AI-based tools, enhancing risk management capabilities and decision-making efficiency;

- **Oversight capabilities and expertise:** successfully delivering this agenda will require establishing robust oversight capabilities, including fostering a stronger risk culture within the Commission, enhancing in-house expertise, and investing in dedicated training and targeted recruitment for specialised profiles (see Annex 2). Additionally, a clear assessment of whether external risk assessment support offer value for money is crucial to ensure efficient and effective risk management;
- **Reliable and coherent reporting for accounting purposes:** The Commission should provide further accounting guidance to ensure that implementing partners provide data supporting reliable and consolidated accounts as well as the timely delivery of account closure.

Sub-recommendation 4.3: Implement the single audit approach effectively

Internal audit and control functions play a critical role in providing assurance that EU funds are used in line with EU's policies and objectives, and that the Commission's internal control framework is effective in verifying and demonstrating the legality and regularity of operations.

We recommend improving the Commission's internal audit and control strategies and methodologies. This should involve the development of a **single overarching audit framework for each management mode**, supported by a common rulebook and shared methodological principles, while ensuring full compliance with applicable audit standards.

This should be complemented by **shared repositories** of comparable audit results and evidence and by common methodologies for assessing the reliability of external audit work. Audit strategies should also be adapted to reflect objective-based delivery, moving beyond procedural conformity to capture results and impact.

To boost audit efficiency and agility, a **shared, user-friendly audit IT tool** should be developed based on the next MFF architecture, supporting common methodologies, data-sharing, improved data analytics, and AI-assisted test cases. Such an IT tool could also ease interaction with auditees - for instance through an AI-enabled audit companion functionality.

Successfully delivering this agenda will depend on **stronger internal audit and control capacity**. This should be supported by dedicated training, targeted recruitment, and a clear assessment of whether externalisation of the audit work to external audit firms delivers value for money, alongside targeted action to strengthen national audit bodies where needed. To ensure a smooth transition to

the next MFF, it is also important to define the main governance and control arrangements at an early stage, so that the colleagues affected have time to adjust.

Recommendation 5: Integrate internal financial reporting to drive organisational performance

Financial reporting is a cornerstone of the Commission's financial management framework, providing essential intelligence for strategic decision-making, driving operational efficiency, underpinning risk management, and ensuring accountability. As the institution prepares for the next MFF, its financial reporting must evolve to meet the demands of prudent financial management, data-driven decision-making, and transparency.

Problem statement

Despite significant progress in standardising financial reporting across the Commission, in particular through the SUMMA reporting on standard financial KPIs, several challenges hinder the effective utilisation of data to monitor and drive organisational performance on finance matters. Specifically, reporting documents such as the Annual Activity Reports often contain excessive or repetitive financial information, which can be overwhelming and not tailored to specific audiences. Variations in KPIs between departments can sometimes make cross-departmental comparisons and strategic analysis more challenging. Additionally, critical procedures that impact timely implementation of the budget and policy delivery, such as the time taken to adopt financing decisions and work programmes, are not adequately tracked through corporate KPIs. Differences in reporting approaches for financial instruments and budgetary guarantees create challenges in maintaining consistent account reliability and achieving timely accounting closure. Data extraction and consolidation can be further strengthened by reducing manual intervention in some areas.

Limited compatibility and interoperability across corporate financial IT systems still create data silos and inconsistencies, restricting the use of data and emerging technologies such as AI. As the Commission moves towards objective-based delivery and greater budgetary flexibility, addressing these challenges will be key to reducing risk and achieving objectives.

Proposed solution

The next MFF should significantly **harmonise and rationalise reporting on performance and funding**. This paradigm shift underlines the importance of data quality and integrity, and the strategic leveraging of digital tools and

technologies to boost efficiency, effectiveness, and overall performance. Combined with tools like dashboards, this could allow to completely rethink the current concept of reporting, by for example allowing recipients of reports to determine what data they want to see, and in what combination.

Turning financial data into a driver of performance and accountability requires action on three fronts:

- **Unified reporting infrastructure:** we recommend using a cutting-edge, integrated internal financial reporting platform that provides a single, unified view of the Commission's financial performance across the entire budget cycle, including accounts. This framework should consist of a single financial reporting platform that integrates data from all corporate IT financial systems and automates data flows and feeds into the AARs and other reporting documents. By harnessing the power of digitalisation and data analytics, the Commission's financial reporting will provide actionable insights, support evidence-based decision-making, and uphold the highest standards of transparency and accountability;
- **High-quality and interoperable data:** however, infrastructure alone is insufficient. High-quality and interoperable data should be a strategic priority rather than a technical afterthought. To achieve this, the Commission should focus on consistently ensuring a 'single source of the truth' for its data, strengthening system interoperability, particularly between SUMMA and other corporate IT systems for financial management, to ensure seamless data exchange and consistency. Additionally, leveraging AI-assisted reporting and analytics can help to identify and address data quality issues, providing insights to inform data-driven decision-making;
- **Refreshed KPI framework:** this framework should be underpinned by a comprehensive review and update of the corporate KPIs used in financial management, in the context of the next MFF, to cover all phases of the programming and budget cycle, providing real-time visibility, sharpening accountability, and enabling data-driven decision-making to drive effective budget implementation and improved performance.

Recommendation 6: Harness the potential of AI in financial management

As highlighted in previous recommendations, the rapid advancement of AI presents unprecedented opportunities for financial management to boost efficiency, accuracy, and compliance. An AI-enabled MFF would involve the use of AI-powered tools and techniques throughout the various stages of the MFF implementation, from programme design to selection, evaluation, and award decisions, monitoring and reporting, compliance, control, and audit, risk management and policy learning. The AI-enabled MFF would be data-driven,

where trusted data flows seamlessly across organisational boundaries, with automated processes supported by AI agents, predictive analytics, enhanced collaboration and knowledge-sharing. This would include Machine Learning – well-established for structured financial data – and more specifically Large Language Models, enabling analysis of unstructured data such as contracts, audit reports, and policy documents. A horizon scanning capability that identifies emerging trends, technologies and future developments would also help pilot and scale future advances in AI for financial management.

Problem statement

Across the globe, governments, corporations and international organisations are deploying AI at scale, reshaping their operations and speeding up decision-making. To date, the Commission has started deploying AI solutions, but this is still being done in a fragmented way.

While individual projects and pilots have demonstrated the potential of AI in financial management, there is currently no coherent approach that coordinates these initiatives, aligns them with the Commission's overall digital transformation objectives, and ensures consistent budgeting, governance and impact-assessment. Without proactive leadership, we risk seeing AI deployed in an ad hoc manner across different programmes, missing the opportunity to embed it systematically within the new programme management architecture.

Proposed solution

In this context, the Commission needs to be proactive and forward-thinking, anticipating and preparing for the opportunities and challenges that AI brings. To capitalise on AI's potential while avoiding fragmentation, we propose a dual strategy that combines the benefits of **strategic planning** with the **flexibility of practical experimentation**.

We recommend that this approach start by encouraging colleagues across the Commission to identify and test practical AI use cases within their specific domains. Before integrating AI, existing processes should be thoroughly reviewed to ensure they are optimised and compatible with AI solutions. These pilots should focus on real operational challenges while demonstrating potential for scalability. Successful implementation should be thoroughly documented, rigorously evaluated, and systematically scaled up across relevant programmes where they prove their value.

Successful AI transformation will also require a higher, but well-managed, risk appetite. While robust governance remains essential, excessive caution risks

limiting ambition and missing a critical opportunity to close a rapidly widening capability gap.

At the same time, we should establish a comprehensive AI framework that aligns with the MFF's overarching objectives. This strategic foundation will ensure consistent implementation across all financial management processes, creating a coherent approach that maximises AI's transformative potential.

By combining agile experimentation with strategic direction, the Commission can transition from the current reactive adoption to intentional, value-driven AI integration that delivers meaningful results across the financial management value chain.

The time to act is now. Early movers will gain competitive advantage in financial management efficiency, while delayed action risks weakening the Commission's ability to operate effectively in an increasingly AI-enabled ecosystem across Member States and reporting systems. With the right approach, AI can become a transformative force in delivering on the EU budget.

Sub-recommendation 6.1: Develop effective steering and oversight

A **governance framework** for financial management should be put in place to address the unique risks and challenges introduced by AI across the whole value chain. This framework should address, among others, compliance, risk management, adequate human oversight, transparency, algorithmic bias, data governance, cybersecurity vulnerabilities, record-keeping and accountability. It should be complemented by concrete structures, processes, documentation, and monitoring. The framework should allocate responsibilities, structure intervention and embed human supervision wherever necessary. This will ensure that AI-driven decisions are transparent, explainable, and subject to appropriate human oversight and scrutiny.

Additionally, as AI becomes embedded in core management and oversight functions, maintaining **control over sensitive financial and programmatic data** is a strategic consideration. The Commission should therefore establish clear criteria for the sourcing and deployment of AI tools, prioritise sovereign solutions where available, and ensure that any third-party dependency is subject to robust contractual, legal, and security safeguards. This is fully aligned with the EU's broader digital sovereignty agenda and should be reflected explicitly in the corporate AI governance framework.

Sub-recommendation 6.2: Establish a strong foundation for AI adoption

To create an enabling environment for AI adoption across the Commission's financial management processes, we recommend that three foundational elements should be addressed.

First, the **Commission's IT infrastructure** should be upgraded where necessary to support advanced AI functionalities. This includes reviewing and enhancing the existing infrastructure to ensure it can handle the complex demands of AI systems, such as processing large and diverse datasets and performing complex algorithms.

Second, the use of **open standards for interoperability** between the Commission's IT systems and those of Member States and implementing partners is vital. This can be achieved through the adoption of common data standards, shared Application Programming Interfaces, and harmonised reporting formats. By doing so, the Commission can enable seamless data exchange and processing, which are critical for the effective functioning of AI systems.

Third, improving **data quality, governance, and analytics** is equally essential. This involves investing in data gathering and management, data analytics and visualisation tools to support AI-driven decision-making, while ensuring data quality, accuracy, and availability. High-quality consistent and reliable data are a prerequisite for training reliable AI models and developing robust data analytics capabilities needed to extract actionable insights from large datasets.

Sub-recommendation 6.3: Invest strategically in AI-powered projects

To ensure effective AI adoption in financial management, we recommend that the Commission implements a comprehensive strategy that combines dedicated funding, robust governance, and strategic risk management.

First, the Commission should establish a dedicated **budget for AI investments in financial management**, including resources for experimentation, pilots, and testing of new use cases. Clear allocation criteria should help to prioritise high-impact projects, while recognising that early-stage pilots may not always succeed. The budget should cover not only the cost of AI tools and technologies, but also essential supporting elements: staff training, infrastructure upgrades, and recruitment of specialised talent. By allocating resources specifically for AI adoption, the Commission can ensure its financial management systems are properly equipped for transformation.

Second, a **structured approach to AI investment** is crucial. Investments should be strategically targeted towards use cases that demonstrate real value through experimentation and pilot deployments, and then scaled where results are positive. Each initiative should be rigorously evaluated to ensure it delivers measurable benefits across the financial management value chain. This structured approach will maximise returns while minimising risks, ensuring resources are allocated to initiatives with the greatest potential to transform financial operations.

Third, to oversee this investment strategy, the Commission should implement a dedicated **AI investment governance structure**. This framework should ensure AI investments align with overall strategy, are properly managed and monitored, and encourage creativity through experimentation. The governance structure should promote transparency and accountability by providing clear evaluation and approval processes, in line with the EU AI Act. It will also help identify and mitigate potential risks such as data privacy concerns, cybersecurity vulnerabilities, and reputational risks.

Finally, by coordinating AI initiatives across EU funding programmes, this governance structure can identify opportunities for synergies and collaboration. This **cross-programme coordination** should lead to economies of scale, greater efficiency, and enhanced impact. The structured approach to AI investment should not only accelerate the adoption of transformative technologies but also ensure the Commission's financial management processes become faster, smarter, and more adaptable to evolving policy priorities.

Sub-recommendation 6.4: Foster a data-driven culture and develop necessary skills

The successful deployment of AI tools in financial management will depend on equipping staff with the skills and confidence to use them effectively. More broadly, integrating AI into the Commission's financial operations will require a culture that supports data-driven decision-making and enables staff to make full use of AI-powered tools and technologies. This includes the use of AI companions as intelligent assistants to augment workforce capabilities, enabling more informed decision-making and enhanced operational efficiency.

To this end, the Commission should implement a **structured upskilling and reskilling programme**, to boost data and AI literacy among staff. Such a programme would provide staff members with the necessary training and resources to understand and work with data, as well as to effectively use AI tools and technologies in their work.

In addition to upskilling and reskilling existing staff, the Commission should also **recruit experts** in data science and AI to support the development and

implementation of AI-powered solutions. These experts would bring valuable expertise and knowledge, enabling the Commission to design and implement AI systems that are tailored to its specific needs and goals in the field of financial management.

A **change management** programme should accompany the transition, providing staff with the necessary support and guidance to adapt to new AI-powered tools and processes, and minimising disruption.

Finally, **leadership** plays a crucial role in promoting a culture that embraces AI and data-driven approaches. By championing data-driven decision-making, leaders can encourage staff to adopt a similar mindset, creating an organisational culture where AI is seen as a transformative technology that enhances human judgment, rather than replacing it. As value is increasingly created by a coordinated system of humans and AI agents, leadership in financial management will need to reimagine workforce planning, performance management, and organisational design. This cultural shift is needed for the successful adoption of AI in financial management, as it will enable staff to work effectively with AI systems, and to leverage the insights and recommendations they provide to inform decision-making.

Annex 1: The power of working together

The recommendations in this report are the product of a eight-month iterative and inclusive process of exploration and consultation, rooted in the principles of **collective intelligence**. The methodology was designed to draw on the expertise of senior stakeholders across all relevant thematic domains, while mitigating cognitive bias and minimising the risk of blind spots.

8 months of active consultation	14 structured focus groups	60+ senior managers engaged	3 phases

Consultation architecture

PHASE 1 (1 Nov 2025 – Jan 2026)	PHASE 2 (February 2026)	PHASE 3 (May 2026)
5 plenary meetings · LSR Financial Management crew	7 focus groups · over 40 senior managers	6 focus groups on AI & IT · 20 senior managers Exchange with the RUF
Thematic scoping	Stress-testing ideas	Sharpening the focus
5 plenary workshops to explore the themes covered by the workstream. Each session was structured around collaborative small-group work, fostering open exchange and bottom-up ideation. 12 thematic opportunities were identified, each mapped against its key challenges and potential solutions.	7 focus groups around the thematic opportunities identified in Phase 1, bringing together relevant senior managers from across the Commission. Participants were presented with open-ended, unprimed questions to prevent anchoring effects and ensure genuinely unbiased discussion, using Chatham house Rules. FG 1 Financial Circuits · Grants · Procurement FG 2 Governance · Financing Decisions · Objective-Based Funding FG 3 Indirect Management, Financial Toolbox, risk management FG 4 Co-Delegation FG 5 Financial Reporting & Emerging Technologies FG 6 Assurance FG 7 Audit	7 focus groups designed around specific IT tools, convening their respective business owners to deepen insights and identify concrete pathways for embedding AI in the MFF. FG 1 e-Grant FG 2 e-Procurement FG 3 Indirect Management & OPSYS FG 4 PMO FG 5 SFC FG 6 FTS · SUMMA · ARACHNE

Adaptive recalibration

Structured reporting loop

After each phase, findings were consolidated and reported back to the crew. This served to identify blind spots, confirm emerging directions, challenge assumptions, and drive reorientation where necessary. Collective review also revealed an underweighted area — the role of AI and IT infrastructure — which had surfaced independently across multiple focus groups, triggering the dedicated second consultation wave.

Quality and rigour principles

Inclusive scope

Maximum reach across the Commission and every workstream sub-theme covered by at least one dedicated focus group.

Bias mitigation

Open-ended, non-leading questions used consistently throughout all sessions.

Adaptive design

Methodology adjusted in real time based on emerging findings.

Annex 2: Skills and competences for an AI-enabled MFF

The next MFF will have a profound impact on the Commission's organisational structure and working methods. The increased focus towards an **objective-based approach** places greater emphasis on staff skills in project management, objective-based management, and performance monitoring. In parallel, the **integration of AI** will transform financial management processes across the entire cycle – programming, evaluations, reporting, controls – requiring staff to understand AI tools, their limitations, and to exercise appropriate human oversight. Success will depend on the Commission's ability to bring staff along through clear communication, targeted upskilling/reskilling, and adapted organisational structures.

Staff profiles and required skills and competences

The profiles that are impacted span a broad spectrum of Commission functions.



Policy making

- Combine policy expertise with financial management awareness.
- Understand the full project chain from research to industrial deployment (e.g. European Competitiveness Fund).
- Select appropriate funding tools and interpret results in context.



Programme management

- For objective-based instruments: Define measurable milestones and targets upfront and cost them credibly (*ex ante*); design robust verification mechanisms, including for reforms.
- For financial instruments: assess the best financial instrument to be used for the specific policy area and business case (budgetary guarantee, blending, derisking instrument, equity), management mode and need of associated technical assistance, assess additionality of EU support and risk.
- Use AI tools for programme design with appropriate human oversight.
- Leverage AI for verification of financial information, exclusion grounds and eligibility requirements.



Financial management

- Ensure MFF funding is properly managed in line with new financial rules and procedures.
- Use AI to automate data consolidation, routine reporting, and anomaly flagging.
- Generate real-time dashboards from standardised 'single source of truth' data.
- Exercise sound judgement when interpreting AI-generated outputs.



Audit

- Shift from verifying real costs to assessing/auditing milestones and targets achieved.
- Develop expertise in objective-based implementation and key risk areas (procurement, State aid, FNLC, protection of the EU's financial interests).
- Apply AI and data analytics to reduce sampling reliance and improve risk analysis and anomaly detection.
- Understand AI use by national authorities and the European Court of Auditors.



Risk management

- Strengthen in-house capacity in quantitative modelling, equity investments, and credit and market risk.
- Extend risk management training beyond specialist teams to staff across the Commission, embedding financial risk awareness as a shared competence rather than a siloed function.



Evaluation and monitoring

- Develop new methodologies and tools to assess performance and impact.
- Design indicators, collect and analyse data, and assess progress against milestones and targets.



HR and organisational development

- Support adaptation to next MFF priorities through workforce planning.
- Drive skills development, reskilling, and knowledge transfer from the Recovery and Resilience Facility.
- Support staff through the transition with targeted change management measures.



Digital transition

- Align digital infrastructure and capabilities with MFF priorities.
- Support automation, data-driven decision-making and secure information management.
- Cover IT, data analytics, and cybersecurity functions.



Legal affairs

- Ensure MFF-related legislation and regulations are properly implemented and enforced.
- Address emerging legal issues linked to objective-based delivery and digitalisation, and the use of AI in programme management and control.



Communication and outreach

- Develop messaging strategies to communicate MFF priorities and results to stakeholders.
- Highlight the need to demonstrate the added value of EU funding.
- Support transparency and accountability with external stakeholders.

Annex 3: Prioritisation framework

All recommendations have been retained as they are deemed useful, impactful, and realistic. However, to further refine the review and support a more structured decision-making, a **prioritisation framework** was developed. This framework allows the recommended actions to be differentiated according to the nature of their impact – ranging from transformative to stepwise evolution aimed at supporting efficiency gains – as well as according to their expected implementation horizon, distinguishing between actions deliverable in the short to medium term (aligned with the start of the next MFF), and those requiring a longer-term horizon.

Transformative impact	Short- to medium-term	Medium- to longer-term
	TRANSFORMATIVE QUICK WINS	STRATEGIC PROJECTS
	(1.1) Leverage grants to better achieve policy goals (1.2) Harness expertise, data and technology to power policy-driven procurement (2.1) Indirect management: Promote a more comprehensive approach to funding (4.1) Shift towards an AI-enabled, harmonised and objective-driven control framework (4.2) Develop a more strategic and effective risk management and oversight for the Union's financial operations (6.1) AI deployment - Develop Effective Governance and Oversight	(1.3) Embrace alternative funding instruments (3.3) Leaner, automated and AI-enabled financial circuits - AI deployment: (6.2) Establish a Strong Foundation for AI Adoption (6.3) Invest Strategically in AI-Powered Projects (6.4) Foster a Data-Driven Culture and Develop Necessary Skills
Stepwise evolution	SUPPORTING ADJUSTMENTS	COMPLEMENTARY ACTION
	(2.2) Establish a Centralised Coordination and Standardisation Framework (2.3) Deploy eGrants as corporate IT Tool for indirect management (3.1) Agile processes and digital workflows for Financing Decisions and Work Programmes (3.2) Simplified Financial Arrangements Across DGs (4.3) Implement the single audit approach effectively	(5) Integrate internal financial reporting to drive performance

The prioritisation of (sub-)recommendations was based on a **three-step process**. It first involved individual scoring by crew members against impact, implementation horizon (shorter-term or longer-term), and resources estimated for implementation. This was followed by a consensus discussion to align

interpretations and agree on consolidated scores. Final values were then derived from the average agreed scores and mapped onto a prioritisation matrix, enabling categorisation according to impact and implementation horizon.

Beyond impact and implementation horizon, the assessment also allowed for the identification of more **resource-intensive** initiatives (i.e. in terms of budgetary or staffing requirements).

Typically, IT developments – such as those required for the onboarding of all categories of expenditure into corporate IT systems (sub-recommendation 3.3), the upgrade of IT infrastructure for AI deployment (sub-recommendation 3.1), or the development of monitoring and evaluation frameworks for financial instruments and budgetary guarantees (sub-recommendation 1.3) – are perceived as more resource-intensive.

By contrast, governance and process-related (sub-)recommendations are generally assessed as requiring fewer resources. This is the case, for instance, for the sub-recommendation on co-delegations (sub-recommendation 3.2), on governance and oversight of AI deployment for financial management (sub-recommendation 6.2), the more comprehensive approach to funding under indirect management (sub-recommendation 2.1), and the sub-recommendation on grant processes (sub-recommendation 1.1).

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