

Annual Activity Report 2025

Directorate-General for Competition

Contents

Contents	2
DG COMPETITION IN BRIEF	4
EXECUTIVE SUMMARY	5
A. Key results and progress towards achieving the Commission’s general objectives and department’s specific objectives	5
B. Key performance indicators	8
C. Key conclusions on internal control and financial management	9
D. Provision of information to the Commissioner	9
1. KEY RESULTS AND PROGRESS TOWARDS ACHIEVING THE COMMISSION’S GENERAL OBJECTIVES AND SPECIFIC OBJECTIVES OF THE DEPARTMENT	10
General objective 1: A new plan for Europe’s sustainable prosperity and competitiveness ..	10
Specific objective 1.1: Modern, smart competition policy, supporting EU priorities	10
Specific objective 1.2: Effective and efficient enforcement	14
2. INTERNAL CONTROL AND FINANCIAL MANAGEMENT	21
2.1. Control results	21
2.1.1. Overview of the budget and relevant control systems (RCS)	21
2.1.2. Effectiveness of controls	22
2.1.3. Efficiency of controls	26
2.1.4. Economy of controls	27
2.1.5. Conclusion on the cost-effectiveness of controls	28
2.2. Audit observations and recommendations	28
2.3. Assessment of the effectiveness of internal control systems	30
2.4. Conclusions on the assurance	30
2.5. Declaration of Assurance	31
3. A MODERN AND SUSTAINABLE PUBLIC ADMINISTRATION	32
3.1. Human resource management	32
3.2. Digital transformation and data management	33
3.3. Sound environmental management	35

DG COMPETITION IN BRIEF

The Single Market is key to Europe's sustainable prosperity and competitiveness. Access to a well-functioning Single Market provides companies opportunities to invest and scale up. EU competition policy is an indispensable element of a well-functioning Single Market ensuring that all companies can compete fairly on the merits and on equal and non-discriminatory terms. Fair competition makes markets more competitive and resilient, while generating higher productivity, innovation, growth, and lower prices. Competition policy therefore works at the service of an innovative, decarbonised, digital, and secure European economy that is competitive in a global context.

The primary legal framework for EU competition policy is derived directly from [Articles 101 to 109 of the Treaty on the Functioning of the European Union \(TFEU\)](#). These provisions are complemented by specific regulations and directives, as well as communications that provide guidance on the interpretation and application of EU competition law. To address digital and global market developments, this framework is bolstered by the [Digital Markets Act \(DMA\)](#) ⁽¹⁾ and the [Foreign Subsidies Regulation \(FSR\)](#) ⁽²⁾, which ensure market contestability in digital sectors and address distortions caused by foreign subsidies.

The Commission [protects competition from market distortions](#) originating from Member States or unlawful company behaviour, or mergers that significantly impede effective competition in the Single Market. DG Competition exercises its mandate primarily through [direct enforcement actions](#). The economic impact of enforcement interventions is substantial, estimated in the range of EUR 12.4 – 21.9 billion customer savings in 2025. Enforcement actions strictly adhere to the rule of law and are subject to the scrutiny of the Union courts. Competition proceedings are governed by the principles of transparency, predictability, non-discrimination, the right to be heard, and the protection of confidentiality. Also, EU national competition authorities (NCAs) apply Articles 101 and 102 TFEU alongside the Commission. To ensure that these rules are applied effectively and consistently across the Union, the Commission and NCAs coordinate their enforcement activities and cooperate through the European Competition Network (ECN).

As of 1 August 2025, the DG has been led by Director-General (acting) Linsey McCallum, reporting to [Executive Vice-President Ribera](#). The Director-General is supported by three Deputy Directors-General. At the end of 2025, DG Competition was structured into 11 directorates and 54 units. Approximately 70% of the staff (842 staff in December 2025) is engaged in enforcement activities. Operational capacity is supported by the [Single Market Programme](#) ⁽³⁾. In 2025, the competition component provided necessary funding for digital infrastructure, policy initiatives, international cooperation and advocacy activities.

⁽¹⁾ Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act), OJ L 265, 12.10.2022, p. 1–66.

⁽²⁾ Regulation (EU) 2022/2560 of the European Parliament and of the Council of 14 December 2022 on foreign subsidies distorting the internal market, OJ L 330, 23.12.2022, p. 1–45.

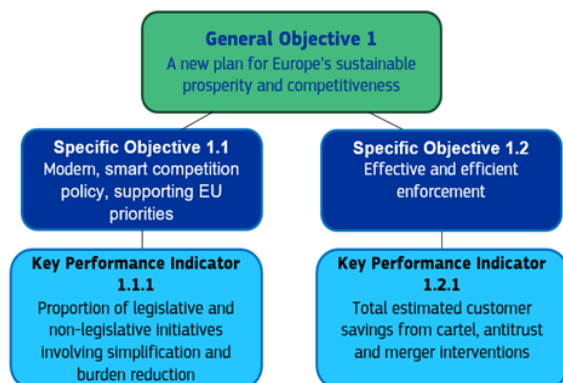
⁽³⁾ Regulation 2021/690 of the European Parliament and of the Council of 28 April 2021 establishing a programme for the internal market, competitiveness of enterprises, including small and medium-sized enterprises, the area of plants, animals, food and feed, and European statistics (Single Market Programme) and repealing Regulations 99/2013, 1287/2013, 254/2014 and 652/2014, OJ L 153, 3.5.2021.

EXECUTIVE SUMMARY

The annual activity report is a management report of the Director-General of DG Competition to the College of Commissioners. Annual activity reports are the main instrument of management accountability within the Commission and constitute the basis on which the College takes political responsibility for the decisions it takes as well as for the coordinating, executive and management functions it exercises, as laid down in the Treaties ⁽⁴⁾.

A. Key results and progress towards achieving the Commission's general objectives and department's specific objectives

In 2025, in line with the Mission letter of Executive Vice-President Teresa Ribera, DG Competition continued to advance **a modern, smart competition policy** and **effective and efficient enforcement** to support EU strategic goals: **Europe's sustainable prosperity and competitiveness** as well as other EU priorities. The overarching aim remains to ensure that EU competition policy stays agile, effective, and aligned with global technological and geopolitical shifts, reinforcing the Single Market as a pillar of fairness, innovation, and sustainability.



Key instruments — **antitrust, merger control, State aid control, the DMA, and the FSR** — were deployed to foster fair competition and ensure the integrity of the Single Market. All instruments were subject to a comprehensive stress-testing to identify potential for further streamlining. To identify opportunities for simplification and administrative burden reduction, DG Competition engaged in implementation dialogues and reality checks

contributing to the Commission's goal of cutting reporting requirements by 25% for companies and 35% for SMEs.

A highlight of the year in **State aid** area was the adoption of the **Clean Industrial Deal State Aid Framework (CISAF)**, which simplified rules for industrial decarbonisation projects, renewable energy investments, and clean tech manufacturing, accelerating the EU's shift toward a sustainable economy. Additionally, the Commission revised the **Services of General Economic Interest (SGEI)** rules to promote **energy-efficient social and affordable housing** in the framework of the **European Affordable Housing Plan**, while a review of the **General Block Exemption Regulation (GBER)** was launched to further cut red tape for Member States and businesses. In the health sector, DG Competition issued **guidance on critical medicines supply chains** under the proposed **Critical Medicines Act**, aiming to bolster EU manufacturing resilience. The transport sector also saw developments with work on a new **Transport Block Exemption**

⁽⁴⁾ Article 17(1) of the Treaty on European Union.

[Regulation \(TBER\)](#) and [guidelines](#) designed to incentivise rail and inland waterways over road transport and improve multimodal logistics. Notable State aid approvals included EUR 11 billion for French offshore wind farms under CISAF, EUR 5 billion for German industrial decarbonisation, and EUR 2.3 billion for Finnish green technology initiatives. Further State aid was authorised for projects such as Austria's EUR 400 million renewable hydrogen production, Denmark's EUR 36 million sustainable aviation fuels programme, and Belgium's nuclear reactor extensions, all aligned with decarbonisation and energy security goals. The IPCEI Tech4Cure project also received EUR 403 million in public funding to develop AI-driven medical devices, with a strong focus on SME participation.

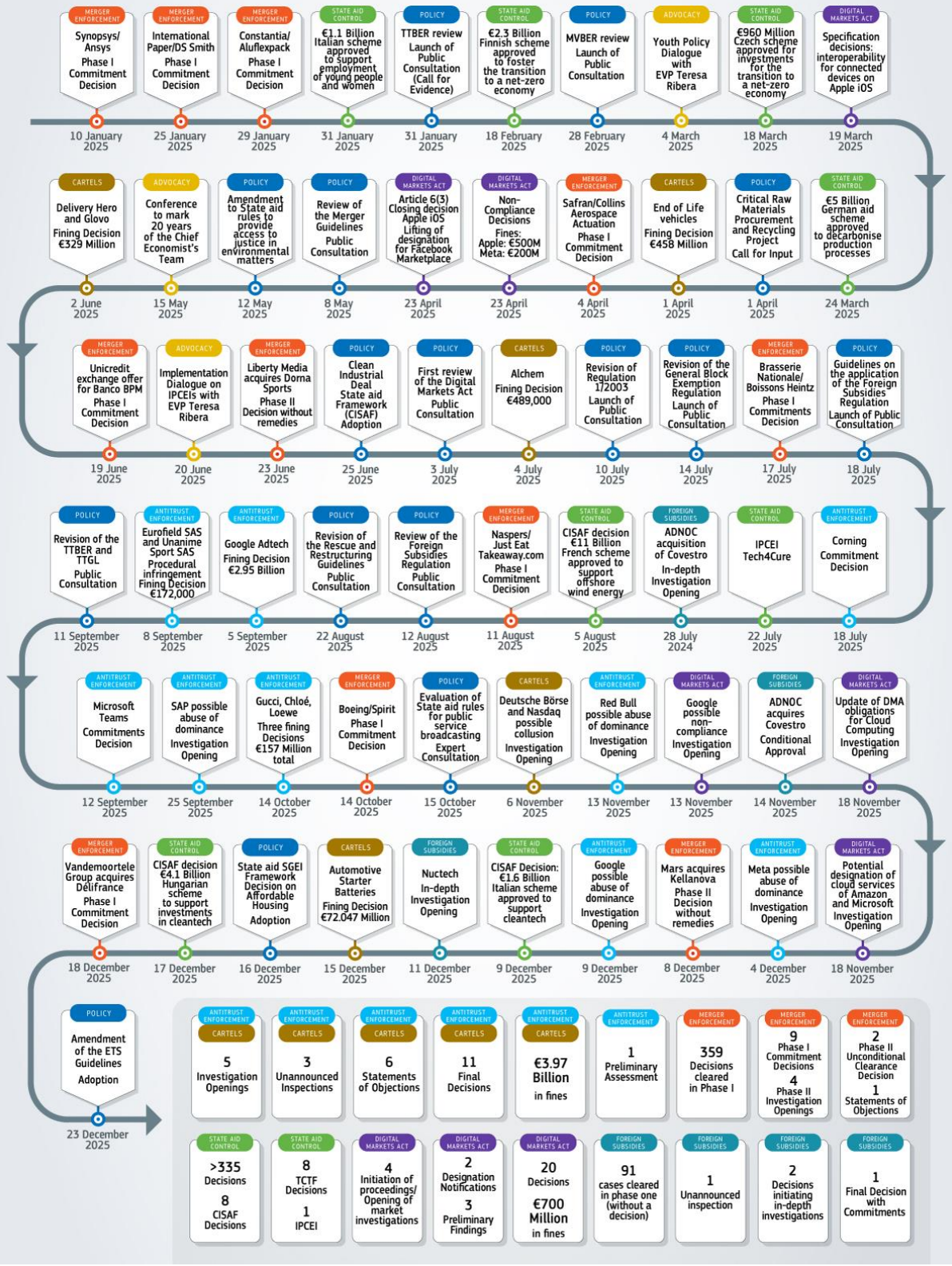
In **antitrust**, major reviews of the procedural framework under [Regulations 1/2003](#) and [773/2004](#) to streamline investigations, of the [Technology Transfer Block Exemption Regulation \(TTBER\)](#) and [technology transfer guidelines](#) as well as the work on the first ever [Guidelines on exclusionary abuses of dominance](#) continued. Antitrust enforcement yielded significant results in 2025, including a EUR 2.95 billion fine for Google over self-preferencing in its adtech services and EUR 157 million fines for luxury brands Gucci, Chloé, and Loewe for resale price maintenance (RPM). Cartel investigations led to EUR 458 million fines for 15 carmakers involved in a 15-year cartel hindering the end-of-life vehicle (ELV) recycling market, as well as EUR 72 million penalties for starter battery manufacturers over price coordination. The Commission also tackled labour market collusion, imposing EUR 329 million fines on Delivery Hero and Glovo for a no-poach agreement, marking the first such sanction in the EU. [Guidance letters](#) were issued to support automotive licensing groups and sustainable battery container-handling equipment in ports, alongside the first [sustainability agreement opinion](#) under Common Agricultural Policy (CAP) rules for French sustainable wine producers.

Meanwhile, the **merger control** framework currently undergoes a major update, with revisions to the [Horizontal and Non-Horizontal Merger Guidelines](#) to better address challenges posed by several transformational changes in the economy, including digitalisation, globalisation, and decarbonisation. High-profile cases included the conditional approval of Synopsys' acquisition of Ansys in the semiconductor sector, subject to divestitures to preserve competition in optics and chip design, as well as interventions in the aerospace industry to maintain supply chain resilience. Conditional clearances were granted also in sectors such as food packaging and beverage distribution, with divestitures required to maintain competition. The Commission also challenged premature merger implementations, issuing a Statement of Objections to Vivendi for violating the standstill obligation in its acquisition of Lagardere.


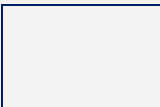
Under the **DMA**, the Commission conducted intense regulatory dialogues with designated companies that lead to significant changes in digital markets. These include more users control over their personal data, enhanced choice of available services (e.g. app stores, search engines and browsers), improved data portability for users and businesses, and interoperability for messaging services and connected devices. Enforcement actions yielded a EUR 500 million fine for Apple over anti-steering practices in its App Store and a EUR 200 million fine for Meta concerning its "consent or pay" model.

The **FSR** saw its first major applications, and [draft guidelines published](#) for stakeholder consultation. Key cases included commitments from ADNOC in its acquisition of Covestro, where an unlimited State guarantee was removed, and an investigation into Nuctech a Chinese-owned scanner manufacturer, over concerns of market distortions enabled by foreign subsidies.

2025 AT A GLANCE



B. Key performance indicators

KPI #	KPI Title	Baseline (2024)	2025		Interim milestone (2027)	Target (2029)
Specific objective 1.1:	Modern, smart competition policy, supporting EU priorities					
	Proportion of legislative and non-legislative initiatives adopted / published involving simplification and burden reduction	67%	75%		>50%	>50%
Specific objective 1.2:	Effective and efficient enforcement					
	Total estimated customer savings from cartel, antitrust and merger interventions	EUR 10.8 bn (EUR 9.1-12.5 bn)	EUR 17.2 bn (EUR 12.4–21.9 bn)		Varying in line with markets affected (EUR x-y bn)	Varying in line with markets affected (EUR x-y bn)

Comments: The above key performance indicators (KPIs) measure 1) how modern, smart competition policy contributes to the simplification and burden reduction efforts of the Commission; and 2) total estimated customer savings from antitrust, cartels and merger enforcement, demonstrating enforcement being effective and efficient. To be noted that the annual target value for the latter varies in line with markets affected (hence the indication ‘EUR x-y billion’ in the last column of the table). While the second indicator does not deliver an exhaustive account of DG Competition's work or its impact on markets (as it only measures the direct customer savings of enforcement action in three of the enforcement instruments of DG Competition and not the effects on innovation or the indirect effects in terms of deterrence), it constitutes a core quantifiable result indicator of the activities contributing to the Commission priority supporting Europe’s sustainable prosperity and competitiveness. To indicate the level of its activity and output, DG Competition also publishes annually the number of adopted enforcement decisions by the Commission (or intervention rate), including in the area of State aid. ⁽⁵⁾

⁽⁵⁾ DG Competition draws antitrust, merger control and State aid control related performance data from its case management systems and, for State aid, information provided by the Member States and carries out regular checks of the data. State aid Scoreboard data is published with EUROSTAT as other statistics pursuant to a Memorandum of Understanding between DG Competition and EUROSTAT. DG Competition considers its published data reliable in line with the corporate criteria for reliability of performance information. The direct benefits of its competition policy interventions in the fields of antitrust, cartels and merger control are calculated using the estimated customer savings approach, in line with principles outlined by the OECD. (See *OECD Guide helping competition authorities assess the expected impact of their activities* (April 2014) <http://www.oecd.org/daf/competition/Guide-competition-impact-assessmentEN.pdf>; Competition Policy Brief (October 2022) <https://data.europa.eu/doi/10.2763/80601>; and *Assessing the Impact of Competition Authorities’ Activities* (June 2025), see <https://www.oecd.org/en/events/2025/06/assessing-the-impact-of-competition-authorities-activities.html>). The Commission further uses a macroeconomic model of the EU economy to assess the effects of competition policy enforcement on economy-wide indicators. DG Competition does not contribute to first-level performance indicators included in the Single Market Programme. There is thus no additional performance information related to the EU budget spending programmes reported in DG Competition’s Annual Activity Report.

C. Key conclusions on internal control and financial management

DG Competition has systematically examined the available control results and indicators, as well as the observations and recommendations issued by the internal auditor and the European Court of Auditors.

The transition in 2025 to the Commission's new accounting system, SUMMA, has required adjustments to a new system and has impacted budget implementation tasks, processes and financial management activities, particularly during the first part of the year. This has required careful management to ensure the same data quality as in previous years. In some cases, this may have resulted in lower performance for some standard financial indicators such as timely payments.

All the above elements have been assessed to determine their impact on management's assurance about the achievement of the control objectives. Please refer for further details to section 2 on Internal Control and Financial Management.

In conclusion, management has reasonable assurance that, overall, suitable controls are in place and working as intended; risks are being appropriately monitored and mitigated. Some improvements are necessary concerning the evaluation of tenders in procurement procedures. Relevant measures are being taken. The Director-General (acting), in her capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance.

D. Provision of information to the Commissioner

In the context of the regular meetings during the year between DG Competition and the Commissioner on management matters, the main elements of this report and assurance declaration, have been brought to the attention of Executive Vice-President Teresa Ribera, Commissioner responsible for Competition.

1. KEY RESULTS AND PROGRESS TOWARDS ACHIEVING THE COMMISSION'S GENERAL OBJECTIVES AND SPECIFIC OBJECTIVES OF THE DEPARTMENT

General objective 1: A new plan for Europe's sustainable prosperity and competitiveness

Throughout 2025, DG Competition undertook substantial work to deliver on its mandate in the current complex economic and geopolitical landscape, protecting against distortions of competition that harm the public interest. All instruments of EU competition policy – antitrust, merger control and State aid – as well as the DMA and the FSR were deployed to support a clean, just and competitive transition.

Specific objective 1.1: Modern, smart competition policy, supporting EU priorities

In 2025, DG Competition's work focussed on modernising and simplifying competition rules to ensure that they remain effective and take account of the multiple transformational changes in the economy as well as reduce administrative burden.

In the area of **State aid**, the adoption of the Clean Industrial Deal State Aid Framework (CISAF) ⁽⁶⁾ was a strategic priority. CISAF facilitates the EU's clean transition and strengthens the resilience of the Single Market by simplifying rules across several key areas, including industrial decarbonisation and renewable energy roll-out. DG Competition also launched a Design Support Hub for Important Projects of Common European Interest (IPCEIs) ⁽⁷⁾ to streamline and speed up Member State efforts to set up these cross-border projects.

In December, the Commission adopted the European Affordable Housing Plan. As a key component of this plan, new Services of General Economic Interest (SGEI) rules for affordable housing ⁽⁸⁾ were introduced to facilitate Member State support for energy-efficient, social, and

⁽⁶⁾ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions; The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation COM/2025/85 final.

⁽⁷⁾ See https://competition-policy.ec.europa.eu/state-aid/ipcei/design-support-hub_en#ipcei-candidates-in-the-design-support-hub

⁽⁸⁾ See https://competition-policy.ec.europa.eu/state-aid/legislation/sgei_en#targeted-revision-of-the-sgei-rules-for-affordable-housing and https://competition-policy.ec.europa.eu/document/download/0548ab89-a029-4d12-ac6e-a1d503093ba6_en?filename=2025_SGEI_revised_decision_Q%26A.pdf

affordable housing initiatives, supporting an inclusive and just transition.

Regarding health, the Commission issued [guidance on applying State aid rules to support the supply of critical medicines](#) ⁽⁹⁾ in the context of the then proposed Critical Medicines Act. This initiative aims to diversify pharmaceutical supply chains and boost manufacturing capacity within the EU to ensure the availability of essential products.

A major review of the [General Block Exemption Regulation \(GBER\)](#) ⁽¹⁰⁾ was initiated in line with the Competitiveness Compass. This update aims to simplify the existing rules and reduce administrative burden, allowing Member States to grant aid more expediently for projects with minimal distortion to the Single Market.

Furthermore, to support the Commission's Sustainable and Smart Mobility Strategy, and in line with the Clean Industrial Deal, work advanced on the new [Transport Block Exemption Regulation \(TBER\) and Guidelines on State aid for land and multimodal transport](#) ⁽¹¹⁾. These measures are designed to incentivise a shift from road to sustainable land transport modes in particular rail and improve the overall efficiency of the EU transport network.

Finally, technical updates to the [Emissions Trading Scheme \(ETS\) State aid Guidelines](#) ⁽¹²⁾ were adopted, ensuring continued support for electricity-intensive users contributing to the competitiveness of EU industry while maintaining alignment with 2030 climate goals.

In the area of **merger control**, the Commission launched a major review of its [Horizontal and Non-Horizontal Merger Guidelines](#) ⁽¹³⁾ to ensure they remain fit for a rapidly transforming economy. This update intends to encompass new market realities, including digitalisation, artificial intelligence (AI), and the green transition, while aligning with the mandate to enhance the EU's global competitiveness.

In the area of **antitrust**, the Commission launched a review of the [core procedural framework \(Regulations 1/2003 and 773/2004\)](#) ⁽¹⁴⁾ to improve its effectiveness with a view to simplify procedures, accelerate investigations and ensure the enforcement tools remain effective in rapidly changing markets. This process included a call for evidence and a public consultation to gather stakeholder feedback on potential policy options for modernising the rules.

Work also advanced on the [Guidelines on exclusionary abuses of dominance](#) ⁽¹⁵⁾, refining the text to incorporate stakeholder feedback and recent case law from the EU Courts. The final Guidelines, expected in 2026, will seek to enhance legal certainty and predictability for undertakings, while continuing to promote a workable effects-based approach to exclusionary conduct. Similarly, work continued on the review of the [Technology Transfer Block Exemption](#)

⁽⁹⁾ See https://competition-policy.ec.europa.eu/document/download/a51c37be-2f9f-4d92-bdf5-ae38bfa91908_en

⁽¹⁰⁾ See https://competition-policy.ec.europa.eu/state-aid/gber-review_en

⁽¹¹⁾ See https://competition-policy.ec.europa.eu/public-consultations/2024-lmtg-and-tber_en

⁽¹²⁾ Communication from the Commission amending the Guidelines on certain State aid measures in the context of the system for greenhouse gas emission allowance trading post-2021, C/2025/9298, OJ C, C/2026/196, 5.1.2026.

⁽¹³⁾ See https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14596-Merger-guidelines-review/public-consultation_en

⁽¹⁴⁾ See https://competition-policy.ec.europa.eu/public-consultations/eu-antitrust-revision-procedural-rules-revision_en

⁽¹⁵⁾ See https://competition-policy.ec.europa.eu/public-consultations/2024-article-102-guidelines_en

Regulation (TTBER) and accompanying guidelines⁽¹⁶⁾. The revised framework will aim to facilitate technology dissemination and incentivise innovation while reducing compliance costs and administrative burdens for businesses.

Concerning the **FSR**, the Commission consulted stakeholders on [draft Guidelines](#) to clarify in particular the assessment of distortive foreign subsidies and the application of the balancing test. Additionally, [a call for evidence and public consultation](#)⁽¹⁷⁾ were published to launch the first review of the Commission's practice of implementing and enforcing the Regulation ahead of the [report](#) due in 2026.

Concerning the **DMA**, the Commission carried out a [public consultation and call for evidence](#)⁽¹⁸⁾ to formally assess the DMA's impact and its capacity to address emerging challenges, such as the transformative rollout of AI-powered services. Based on the stakeholder input received, the Commission began preparing its first [review report](#) due in May 2026.

DG Competition applied **Better Regulation tools** to ensure an evidence-informed update of certain specific pieces in the competition legal framework, thereby contributing to the Commission's simplification and burden-reduction targets. DG Competition conducted stress-testing of the following specific instruments covering all five policy areas (State aid, merger control, antitrust, FSR, and DMA) to identify potential for streamlining:

- **State aid**: an important milestone was reached with the adoption of the revised SGEI rules on affordable housing. Additionally, an evaluation of the Guarantee Notice was completed, and the ongoing revision of GBER (covering around 69% of all active aid measures⁽¹⁹⁾) aims specifically at cutting red tape for Member States and companies;
- **merger control**: a comprehensive review of the Horizontal and Non-Horizontal Merger Guidelines was launched in 2025, utilising general and targeted stakeholder consultations to, among others, clarify the assessment framework and reduce legal uncertainty for businesses;
- **antitrust**: following an evaluation of the procedural framework (Regulations 1/2003 and 773/2004), work on an impact assessment started in 2025 to support a subsequent legislative proposal aimed at improving the effectiveness and speed of investigations and reducing the burden for companies; work on an impact assessment of the TTBER proceeded during the reporting year with a view to identifying scope for further simplification;
- **FSR & DMA**: both instruments undergo implementation assessments focussed on, among other things, identifying simplification potential. The results of these assessments will be consolidated into a review report for each instrument.

These initiatives incorporate the objective of [reducing administrative burdens](#). While precise quantification of the cumulative impact is not possible, these measures contribute to the Commission's target of reducing reporting burdens by 25% for all companies and 35% for SMEs.

⁽¹⁶⁾ See https://competition-policy.ec.europa.eu/public-consultations/2025-technology-transfer_en

⁽¹⁷⁾ See https://competition-policy.ec.europa.eu/public-consultations/guidelines-foreign-subsidies_en

⁽¹⁸⁾ See https://digital-markets-act.ec.europa.eu/consultation-first-review-digital-markets-act_en

⁽¹⁹⁾ See https://competition-policy.ec.europa.eu/document/download/cc9cdf4e-97e9-4f8e-ac7d-5f094a9fd12d_en?filename=state_aid_scoreboard_note_2025.pdf

In 2025, DG Competition also collaborated with other Commission services to ensure competition principles were reflected in approximately 90 Commission legislative proposals. These **contributions to crosscutting Commission policies** ensured that competition principles and rules contribute effectively to the Union's strategic goals. Key examples include, **support for competitiveness** (e.g., the Competitiveness Compass ⁽²⁰⁾, the Single Market Strategy ⁽²¹⁾, Start-up and Scale-up Strategy ⁽²²⁾, and Digital Networks strategies ⁽²³⁾), as well as the Quality Jobs Roadmap ⁽²⁴⁾ and the Biotech Act ⁽²⁵⁾), **decarbonisation** (e.g., Clean Industrial Deal, alongside the Battery Booster and Bioeconomy strategies ⁽²⁶⁾ and the European Affordable Housing Plan), and **resilience** (e.g., the Critical Medicines Act, the Vision for Agriculture and Food ⁽²⁷⁾, the White Paper on Defence ⁽²⁸⁾, the Preparedness Union ⁽²⁹⁾, and the Economic Security Package ⁽³⁰⁾, including ReSourceEU). DG Competition also contributed to advancing the simplification agenda by contributing to the Sustainability, Defence, Digital, and Automotive Omnibus initiatives ⁽³¹⁾.

The specific objective of a modern and smart competition policy also encompasses an active dialogue with a variety of stakeholders, both within and outside Europe. In 2025, DG Competition actively engaged in **outreach and advocacy efforts** with representatives of the European Parliament, European Economic and Social Committee (EESC) as well Member States as part of a regular dialogue with other EU institutions. When it comes to the **external dimension**, as global convergence on effective competition rules is essential to maintain a level playing field, DG Competition **deepened engagement with multilateral organisations**, including the Organisation for Economic Co-operation and Development (OECD) and the International Competition Network (ICN). A key achievement was concluding the co-chairmanship of the ICN Merger Working Group by delivering updated chapters on unilateral and coordinated effects for the ICN Recommended Practices for Merger Analysis. DG Competition also ensured participation and provided written contributions to the work of the OECD Global Forum, the Competition Committee and its Working Parties, including recommendations, peer reviews, and various workstreams. On trade, the Commission **concluded free trade agreement (FTA) negotiations** with Indonesia and continued talks with India,

⁽²⁰⁾ See https://commission.europa.eu/document/download/10017eb1-4722-4333-add2-e0ed18105a34_en?filename=Communication_1.pdf

⁽²¹⁾ See https://single-market-economy.ec.europa.eu/document/download/d92c78d0-7d47-4a16-b53f-1cead54bcb49_en?filename=Communication%20-%20Single%20Market%20Strategy.pdf

⁽²²⁾ See https://research-and-innovation.ec.europa.eu/document/download/2f76a0df-b09b-47c2-949c-800c30e4c530_en?filename=ec_rtd_eu-startup-scaleup-strategy-communication.pdf

⁽²³⁾ See <https://digital-strategy.ec.europa.eu/en/policies/digital-networks-act>

⁽²⁴⁾ See https://employment-social-affairs.ec.europa.eu/document/download/82975aa7-bdd6-4a64-b3e3-82433901f8f7_en?filename=Quality-Jobs-Roadmap_Communication_2025.pdf

⁽²⁵⁾ See https://health.ec.europa.eu/document/download/ec1475b7-e3f9-409e-b927-fc7e69306a8c_en?filename=biotech_reg-com2025-1022_act_en.pdf

⁽²⁶⁾ See <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0960>

⁽²⁷⁾ See <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0075>

⁽²⁸⁾ See https://commission.europa.eu/document/download/e6d5db69-e0ab-4bec-9dc0-3867b4373019_en?filename=White%20paper%20for%20European%20defence%20%E2%80%93%20Readiness%202030.pdf

⁽²⁹⁾ See <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/b81316ab-a513-49a1-b520-b6a6e0de6986/file.bin>

⁽³⁰⁾ See https://commission.europa.eu/news-and-media/news/new-tools-reinforce-eus-economic-security-2024-01-24_en

⁽³¹⁾ See <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/c2bfb611-2cbf-42c7-8043-a68b8ecec1e2/download>

Malaysia, the Philippines, Thailand, and the association of five Eastern and Southern African countries (ESA-5), while starting new negotiations with the United Arab Emirates. Regarding [cooperation agreements](#), the Commission adopted proposals to conclude the EU/UK Competition Cooperation Agreement and continued negotiations with Canada to replace the 1999 agreement. It also maintained cooperation with the authorities of Korea, Japan, and China under existing arrangements. Furthermore, the Commission [supported regional integration](#) in Sub-Saharan Africa and monitored the alignment of candidate countries and Kosovo with the Single Market framework. These activities aim to establish well-functioning legislative frameworks and operationally independent competition and State aid authorities in candidate countries, while fostering fair competition regimes in foreign jurisdictions, thereby safeguarding the interests and competitiveness of EU firms.

Specific objective 1.2: Effective and efficient enforcement

By acting against unlawful behaviour and market distortions in 2025, DG Competition protected the functioning of the Single Market and contributed to transform key EU values into tangible market realities. This work ensured that competition could take place on fair and equal terms, reinforced legal certainty while promoting integrity in the Single Market.

State aid enforcement during the year supported the EU's clean, just, and competitive transitions by facilitating large-scale public investment in strategic sectors. Key approvals included:

- **renewable energy**: a EUR 11 billion French measure for three floating offshore wind farms was approved under CISAF, using competitive bidding to accelerate sustainable energy at scale ⁽³²⁾;
- **industrial decarbonisation**: major schemes were approved for Germany (EUR 5 billion for 90% emission reductions in ETS processes) ⁽³³⁾, Finland (EUR 2.3 billion for investments into renewable energy generation, industrial decarbonisation investments and strategic technologies investments) ⁽³⁴⁾, and the Netherlands (EUR 1.2 billion for the reduction of Greenhouse Gas emissions in the industrial value chain,) ⁽³⁵⁾; a Spanish scheme was approved under CISAF to support manufacturing decarbonisation through electrification, renewable hydrogen, and carbon capture ⁽³⁶⁾;
- **clean technology manufacturing investments**: this included the approval of schemes in Spain (EUR 700 million) ⁽³⁷⁾, Italy (EUR 1.5 billion) ⁽³⁸⁾ and Hungary (EUR 2 billion) ⁽³⁹⁾;

⁽³²⁾ Case SA.115764 – France – EPIP – Régime de soutien à trois parcs éoliens en mer, l'un au large du Sud de la Bretagne et deux autres en Méditerranée, 5.8.2025.

⁽³³⁾ Case SA.116065 – Förderprogramm Klimaschutzverträge – Second auction of the Climate Protection Contracts scheme, 24.3.2025.

⁽³⁴⁾ Case SA.114934 – TCTF - Act on Tax Credit for Certain Large Investments Aiming at a Climate Neutral Economy, 18.2.2025.

⁽³⁵⁾ Case SA.103901 – the Netherlands - NL_KGG_RGG_VI_Nationale Investeringsmodule Klimaatprojecten Industrie (NIKI), 20.5.2025.

⁽³⁶⁾ Case SA.119880 – Spain - CISAF/RRF - *Aid scheme for the decarbonisation of manufacturing industry*, 15.12.2025.

⁽³⁷⁾ Case SA.119884 – Spain – CISAF: Strengthening the industrial value chain of clean technologies and their key components, 6.11.2025.

⁽³⁸⁾ Case SA.120488 – Italy – RRF – CISAF: Framework scheme for manufacturing capacity relating to clean technologies, 9.12.2025

⁽³⁹⁾ Case SA.120705 – Hungary – Aid to ensure sufficient manufacturing capacity in clean technologies, 17.12.2025.

- **green energy**: support included EUR 400 million in Austria for renewable hydrogen via the European Hydrogen Bank, ⁽⁴⁰⁾ and EUR 36 million in Denmark for sustainable aviation fuels ⁽⁴¹⁾.
- **energy security**: approval of electricity reserves for Sweden (EUR 300 million) ⁽⁴²⁾ and Estonia (EUR 750 million) ⁽⁴³⁾ to safeguard supply in emergency situations;
- **nuclear energy**: approval of the lifetime extension of two reactors in Belgium (Doel 4 and Tihange 3) ⁽⁴⁴⁾, and of the construction of Poland's first nuclear power plant ⁽⁴⁵⁾, supporting both decarbonisation and security of supply.

In the area of **health**, the Commission approved the **IPCEI Tech4Cure** ⁽⁴⁶⁾, enabling five Member States to provide EUR 403 million in public funding, unlocking EUR 826 million in private investment for AI-powered medical devices. 60% of participants are SMEs, reflecting the Commission's ambition to involve smaller firms in IPCEIs. Tech4Cure also served as the pilot for the IPCEI Design Support Hub ⁽⁴⁷⁾.

Antitrust enforcement focused on ensuring market fairness across digital and non-digitalised sectors, utilising both 'hard' enforcement and 'soft' guidance to support EU strategic goals. The Commission addressed market distortions through several key interventions:

- **digital markets & online advertising** (Google Adtech): the Commission fined Google EUR 2.95 billion for self-preferencing its online display advertising technology services. The decision orders Google to cease self-preferencing practices and implement measures to end the conflicts of interest in its adtech supply chain, enabling competitors to innovate on equal terms and consumers to make more informed choices ⁽⁴⁸⁾;
- **digital collaboration tools** (Microsoft Teams): the Commission accepted commitments from Microsoft to unbundle Teams from Office 365/Microsoft 365 software suites, ensuring interoperability with rival tools and restoring market choice ⁽⁴⁹⁾;
- **consumer electronics** (Corning): commitments from Corning were made binding to resolve concerns over exclusive supply agreements for break-resistant smartphone glass. Corning will waive exclusive dealing clauses and limit sourcing requirements to 50% of demand ⁽⁵⁰⁾;
- **high-end consumer goods** (Gucci, Chloé, and Loewe): fines totalling EUR 157 million were imposed on the three companies for engaging in resale price maintenance (RPM), which restricted retailers' freedom to set prices across apparel and leather goods ⁽⁵¹⁾;

⁽⁴⁰⁾ Case SA.116277 – Austria – Austria's Participation in EU Hydrogen Bank Auction, Förderung der Erzeugung von erneuerbarem Wasserstoff nicht biogenen Ursprungs, 10.3.2025.

⁽⁴¹⁾ Case SA.102731 – Aid Scheme for Sustainable Aviation Fuels (SAF) in Domestic Aviation, 29.7.2025.

⁽⁴²⁾ Case SA.112968 – Sweden – Electricity Strategic Reserve, 29.7.2025.

⁽⁴³⁾ Case SA.112459 – Estonia – Electricity Strategic Reserve, 28.10.2025.

⁽⁴⁴⁾ Case SA.106107 – Belgium – Lifetime extension of two nuclear reactors (Doel 4 and Tihange 3), 21.2.2025.

⁽⁴⁵⁾ Case SA.109707 – Poland – Aid measures for the first nuclear power plant in Poland, 9.12.2025.

⁽⁴⁶⁾ Cases SA.113212 – France; SA.117899 – Hungary; SA.117859 – Italy; SA.117793 – Slovakia; SA.117849 – Slovenia – Important Project of Common European Interest – Innovative medical devices and support software (IPCEI Tech4Cure), 22.7.2025.

⁽⁴⁷⁾ See https://competition-policy.ec.europa.eu/state-aid/ipcei/design-support-hub_en

⁽⁴⁸⁾ Case AT.40670 – Google – Adtech and Data-related practices, 5.9.2025.

⁽⁴⁹⁾ Cases AT.40721 – Microsoft Teams – Commitments decision, 12.9.2025; and AT.40873 – Microsoft Teams II – Commitments decision 12.9.2025.

⁽⁵⁰⁾ Case AT.40728 – Corning, 18.7.2025.

⁽⁵¹⁾ Cases AT.40840 – Gucci; AT.40880 – Chloé; and AT.40881 – Loewe, all 14.10.2025.

- **procedural compliance** (Eurofield SAS): for the first time, the Commission fined a company for providing incomplete responses to information requests, reinforcing the effectiveness of investigative tools ⁽⁵²⁾.

DG Competition also continued advancing ongoing antitrust and cartel investigations, including into **synthetic turf** and **data-centre construction** ⁽⁵³⁾, a **novel pain medicine for dogs** ⁽⁵⁴⁾, **medical devices** ⁽⁵⁵⁾, **Greek wholesale electricity** ⁽⁵⁶⁾, **Czech packaging waste collection** ⁽⁵⁷⁾, **support and maintenance services for enterprise resource planning software** ⁽⁵⁸⁾, **financial derivatives** ⁽⁵⁹⁾ and **energy drinks** ⁽⁶⁰⁾. Beyond 'hard' enforcement measures, the Commission also issued **guidance** to facilitate innovation and the green transition:

- **guidance letters**: two guidance letters were issued in 2025. The first provided clarity for automotive licensing negotiation groups ⁽⁶¹⁾; the second supported a sustainability initiative for battery-powered container-handling equipment in port terminals ⁽⁶²⁾.
- **opinion on sustainability agreement**: the Commission issued its first opinion under the Common Organisation of the Markets in Agricultural Products Regulation supporting sustainable wine production in Occitanie, France, by providing legal certainty for producers cooperating on sustainable winemaking to set bulk wine orientation prices ⁽⁶³⁾.

The Commission also sanctioned several **hard-core cartels** with impacts on the circular economy and labour markets:

- **end-of-life vehicle (ELV) recycling**: 15 car manufacturers and the ACEA were fined EUR 458 million for a cartel in ELV recycling. For over 15 years, manufacturers colluded to avoid paying dismantlers, hampering the circular economy ⁽⁶⁴⁾;
- **food delivery**: Delivery Hero and Glovo were fined EUR 329 million for a cartel involving market sharing, exchanges of commercially sensitive information, and no-poach agreements. This marked the first time the Commission sanctioned a cartel for labour market restrictions and the use of a minority shareholding to collude ⁽⁶⁵⁾;
- **starter batteries**: a EUR 72 million fine was imposed on three manufacturers and Eurobat for coordinating lead-based price surcharges to create an industry-wide standard ⁽⁶⁶⁾.

⁽⁵²⁾ Case AT.40966 – Synthetic Turf (procedure), 8.9.2025.

⁽⁵³⁾ See https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3133; https://ec.europa.eu/commission/presscorner/detail/en/ip_24_5926

⁽⁵⁴⁾ Case AT.40734, Zoetis-Libreia.

⁽⁵⁵⁾ See https://ec.europa.eu/commission/presscorner/detail/en/ip_23_4517

⁽⁵⁶⁾ Case AT.40278 - Greek wholesale electricity market.

⁽⁵⁷⁾ Case AT.40775 - Czech Waste Collection [Czechia].

⁽⁵⁸⁾ Case AT.40823 - SAP ERP aftermarket support services.

⁽⁵⁹⁾ Case AT.40945 - DBAG/Nasdaq (financial derivatives).

⁽⁶⁰⁾ Case AT.40819 – Red Bull.

⁽⁶¹⁾ See https://ec.europa.eu/competition/antitrust/cases1/202536/AT_40979_104.pdf

⁽⁶²⁾ See https://ec.europa.eu/competition/antitrust/cases1/202536/AT_40976_98.pdf

⁽⁶³⁾ Commission Opinion on the request for opinion pursuant to Article 210a(6) of Regulation (EU) No 1308/2013 by Vignerons Coopérateurs de France - Sustainability agreement in the wine sector in Occitanie, 15.7.2025.

⁽⁶⁴⁾ Case AT.40669 - End-of-life vehicle recycling, 1.4.2025.

⁽⁶⁵⁾ Case AT.40795 – Food delivery services, 2.6.2025.

⁽⁶⁶⁾ Case AT.40545 – Automotive starter batteries, 15.12.2025.

In 2025, the Commission assessed the functioning of EU natural gas and gas derivatives markets within the framework of the [Gas Market Task Force \(GMTF\)](#) established under the CID. This involved extensive analytical work, including a structural mapping of the EU wholesale gas supply markets, to identify potential inefficiencies or shortcomings and ensure proper functioning of these markets. The findings of this work will be published in a forthcoming report which is expected to be published in early 2026.

The Commission reviewed and cleared many transactions under the **EU merger control** rules in 2025. While the vast majority were handled in a simplified manner (88 %) and cleared without conditions, the Commission intervened in some key cases to protect competition and innovation across vital EU sectors:

- **semiconductor design** (Synopsys/Ansys): the Commission approved the transaction subject to divestitures in optics, photonics, and chip design software to preserve competition in critical high-tech markets ⁽⁶⁷⁾;
- **aerospace** (Safran/Collins & Boeing/Spirit): the Commission secured divestitures in aircraft components (THSA) ⁽⁶⁸⁾ and aerostructures ⁽⁶⁹⁾ to ensure supply chain resilience and protect competitor data;
- **industrial & consumer goods**: choice and fair pricing were maintained through divestitures in the food packaging (Constantia/Aluflexpack) ⁽⁷⁰⁾ and beverage distribution (Brasserie Nationale/Boissons Heintz) sectors ⁽⁷¹⁾. The latter followed a referral from Luxembourg under Article 22 EUMR.

The Commission also safeguarded the **jurisdictional and procedural integrity of the EU merger regime**, protecting the Single Market from national interference and ensuring a level playing field:

- **banking** (UniCredit/Banco BPM): following conditional clearance ⁽⁷²⁾, the Commission issued a preliminary assessment finding that conditions imposed by Italy's 'Golden Powers' legislation may breach Article 21 EUMR and Treaty rules on free movement of capital ⁽⁷³⁾;
- **digital & media** (UMG/Downtown & Vivendi): the Commission opened an in-depth investigation into music publishing ⁽⁷⁴⁾ and issued a Statement of Objections to Vivendi for a preliminary breach of the standstill obligation when acquiring Lagardere ⁽⁷⁵⁾, reinforcing the mandatory nature of the *ex ante* merger control regime.

The enforcement of the **DMA** increased market contestability by opening closed digital ecosystems and improving cross-service interoperability. To secure gatekeeper compliance, the Commission combined formal investigations with regulatory dialogues and technical workshops.

⁽⁶⁷⁾ Case M.11481 - Synopsys / Ansys, 23.5.2025.

⁽⁶⁸⁾ Case M.11253 - Safran / Part of Collins Aerospace's actuation and flight control activities, 17.6.2025.

⁽⁶⁹⁾ Case M.11578 - Boeing / Spirit, 14.10.2025.

⁽⁷⁰⁾ Case M.11536 - Constantia / Aluflexpack, 6.5.2025.

⁽⁷¹⁾ Case M.11485 - Brasserie Nationale / Boissons Heintz, 17.7.2025.

⁽⁷²⁾ Case M.11830 - Unicredit / Banco BPM, 19.06.2025.

⁽⁷³⁾ Case M.12052 - UniCredit / Banco BPM - Article 21(4) - Preliminary assessment, 14.07.2025.

⁽⁷⁴⁾ See https://ec.europa.eu/commission/presscorner/detail/pl/ip_25_1875

⁽⁷⁵⁾ See https://ec.europa.eu/commission/presscorner/detail/pl/ip_25_1867

The DMA is co-enforced by DG Competition and DG CNECT. Key enforcement outcomes and ongoing proceedings include:

- **Apple:** the Commission concluded two non-compliance investigations and two specification investigations towards Apple ⁽⁷⁶⁾. As regards the non-compliance investigations, it fined Apple EUR 500 million for anti-steering practices in the App Store ⁽⁷⁷⁾ and closed an investigation after Apple modified its user-choice architecture and browser choice screen ⁽⁷⁸⁾. It also adopted specification decisions regarding hardware and software interoperability for iOS and iPadOS ⁽⁷⁹⁾. One investigation looking into alternative distribution for Apple mobile devices is ongoing ⁽⁸⁰⁾;
- **Meta:** the Commission concluded one non-compliance investigation against Meta and fined Meta EUR 200 million for its ‘consent or pay’ model ⁽⁸¹⁾. Meta subsequently proposed a free version using less personal data. Additionally, the Commission concluded that Facebook Marketplace should no longer be designated as a gatekeeper ⁽⁸²⁾;
- **Alphabet/Google:** formal non-compliance proceedings were launched into Google Search regarding its ‘site reputation abuse policy’ and the access conditions for media publishers ⁽⁸³⁾. Two non-compliance investigations, looking into anti-steering practices and self-preferencing in Google Search are ongoing ⁽⁸⁴⁾;
- **Cloud:** three market investigations were launched: two to assess gatekeeper designation for Amazon Web Services and Microsoft Azure ⁽⁸⁵⁾, and one to evaluate if an amendment of DMA obligations is required for the Cloud computing sector ⁽⁸⁶⁾.

The Commission continued to also rigorously enforce the **FSR** to address distortions caused by subsidies granted by non-EU countries. The FSR is co-enforced by DG Competition and DG GROW. Key examples of enforcement activities during the year include:

- **chemicals (ADNOC/Covestro):** Following an in-depth investigation into an unlimited State guarantee and other benefits, the Commission made binding ADNOC’s commitments to remove the guarantee and share sustainability patents. This addressed distortions in both the acquisition process and the combined entity’s future activities ⁽⁸⁷⁾;
- **security and threat detection (Nuctech):** The Commission opened an in-depth own-initiative investigation into a Chinese-owned manufacturer of scanners. The probe examines whether

⁽⁷⁶⁾ Cases DMA.100109 – Apple – Online Intermediation Services – app stores – AppStore – Art. 5(4), 23.4.2025; Cand DMA. 100185 – Apple – Operating systems – iOS – Art. 6(3), 23.4.2025.

⁽⁷⁷⁾ Case DMA.100109 – Apple – Online Intermediation Services – app stores – AppStore – Art. 5(4), 23.4.2025.

⁽⁷⁸⁾ Case DMA.100185 – Apple – Operating systems – iOS – Article 6(3), 23.4.2025.

⁽⁷⁹⁾ Cases DMA.100203 – Article 6(7) – Apple – iOS – SP – Features for Connected Physical Devices, 19.3.2025; and DMA.100204 – Article 6(7) – Apple iOS and iPadOS – SP – Process, 19.3.2025.

⁽⁸⁰⁾ Case DMA.100206 – Apple – new business terms, 24.06.2024

⁽⁸¹⁾ Case DMA.100055 – Meta – Article 5(2), 23.4.2025.

⁽⁸²⁾ Case DMA.100044 – Meta – online intermediation services – marketplace, 23.4.2025.

⁽⁸³⁾ Case DMA.100231 – Alphabet – Google Search – Site reputation abuse policy, 12.11.2025.

⁽⁸⁴⁾ Case DMA.100075 – Alphabet – Online Intermediation services – app stores – Google Play – Art. 5(4), 25.03.2024, and case DMA.100193 – Alphabet – Online Search Engine – Google Search – Art. 6(5), 25.03.2024

⁽⁸⁵⁾ Cases DMA.100032 – Microsoft – cloud computing services and DMA.100033 – Amazon – cloud computing services, 18.11.2025.

⁽⁸⁶⁾ Case DMA.100236 – Cloud – Article 19, 18.11.2025.

⁽⁸⁷⁾ Case FS.100156 – ADNOC / COVESTRO, 14.11.2025.

foreign subsidies allowed the company to offer prices and conditions that rivals could not match ⁽⁸⁸⁾;

Furthermore, the Commission continued a preliminary review in the [wind energy sector](#).

Effective and consistent antitrust enforcement (ECN): the Commission and the national competition authorities (NCAs) apply EU antitrust rules (Articles 101 and 102 TFEU) in parallel. In the ECN, they coordinate enforcement activities and cooperate to ensure that these rules are applied in an effective and consistent manner across all Member States and promote a common EU competition culture. Under this framework, NCAs inform the Commission of new formal investigative measures and envisaged decisions before final adoption. In 2025, in the framework of the ECN, [154 new investigations were launched in total](#). The NCAs consulted the Commission on [71 envisaged decisions](#). During the year, [37 ECN meetings](#) were held to exchange expertise on ongoing investigations and policy developments, ensuring the decentralised enforcement of EU antitrust rules remains consistent across the Union.

To ensure that enforcement and policy objectives are met while minimising compliance costs and administrative burdens, DG Competition has integrated **Implementation Dialogues and Reality Checks** into its enforcement and policy work. These tools provide a structured mechanism for gathering feedback on the "real-world" application of EU rules and measures.

- In June 2025 (Madrid), the first dialogue focused on [IPCEIs](#) and the specific needs of SMEs. A subsequent dialogue on [Affordable Housing](#) in November focused on the contribution of State aid policy to the overall action of the Commission under the European Affordable Housing Plan.
- In total five Reality Checks were organised to explore solutions for reducing administrative burdens in areas such as [Social and Affordable Housing](#), [Trade Defence Instruments and FSR](#) (jointly with DG TRADE and DG GROW), the [TTBER](#), [Private Enforcement of State Aid](#), and the [Revision of Regulation 1/2003](#).

The results of these engagements are documented in Executive Vice-President Ribera's 2025 **Annual Progress Report on Implementation, Simplification, and Enforcement**. The report gives examples of finalised or ongoing simplification and implementation efforts, including CISAf, GBER and the updated SGEI Decision for affordable housing ⁽⁸⁹⁾ for State aid, the Horizontal and Non-horizontal Merger Guidelines, Regulation 1/2003 for antitrust, the FSR, and the DMA. Following the formal transmission of the Report to the Competitiveness Council on 30 September 2025, Executive Vice-President Ribera discussed its findings on a bilateral basis with Morten Bødskov, Danish Minister for Industry, Business and Financial Affairs, on 5 December 2025. Executive Vice-President Ribera also presented the report to the European Parliament during a Structured Dialogue on 4 December 2025.

⁽⁸⁸⁾ Case FS.100068 – Nuctech, 11.12.2025.

⁽⁸⁹⁾ Commission Decision C(2025) 8820 final of 16.12.2025 on the application of Article 106(2) of the Treaty on the Functioning of the European Union to State aid in the form of public service compensation granted to certain undertakings entrusted with the operation of services of general economic interest and repealing Decision 2012/21/E.

Ex-post evaluation: DG Competition published in 2025 an ex-post evaluation study assessing the effectiveness of antitrust remedies imposed or accepted by the European Commission over the past 20 years under Articles 7 and 9 of Regulation 1/2003 ⁽⁹⁰⁾.

EU added value: DG Competition generates significant measurable EU added value by protecting the integrity of the Single Market and prioritising competition policy interventions with significant impact on the Union or precedent setting potential.

The Commission quantifies the impact of its enforcement in merger control, cartels, and antitrust through estimates of ‘direct customer savings’. These figures represent the estimated price effects in markets where the Commission intervened. In 2025, the estimated direct customer savings from Commission interventions were in the range of EUR 12.4 – 21.9 billion. Data from 2020 to 2024 indicates that enforcement by the ECN network as a whole (EC + NCAs) resulted in average annual customer savings of EUR 18 – 30 billion over that period, i.e. NCAs contribute another 50% (at least) on top of the savings achieved by the Commission.

The positive impact of competition enforcement at the microeconomic level drives broader growth. Beyond recorded price savings and the effects on innovation, enforcement creates a deterrent effect, preventing anti-competitive conduct and potentially harmful market concentrations before they occur. Economic research confirms that competition enforcement - alongside trade and single market policies - contributes to higher productivity and economic growth. Previous [macroeconomic modelling](#) ⁽⁹¹⁾ suggests that these interventions can lead to a long-term increase in real GDP of between 0.6% and 1.1% and a reduction in the aggregate price level of 0.3% to 0.7%. These results indicate that competition policy directly supports GDP growth, investment and consumption across the EU economy.

⁽⁹⁰⁾ Grimaldi Alliance and Nera (2025), *Ex post evaluation of the implementation and effectiveness of EU antitrust remedies*. Final Report for DG Competition, Publications Office of the European Union, 2025, <https://data.europa.eu/doi/10.2763/4894234>

⁽⁹¹⁾ European Commission, Directorate-General for Competition, Joint Research Centre and Directorate-General for Economic and Financial Affairs (2024), “Modelling the macroeconomic impact of competition policy-2023 update and further development”, Publication Office of the European Union.

2. INTERNAL CONTROL AND FINANCIAL MANAGEMENT

Management monitors the functioning of the internal control systems on a continuous basis and carries out an objective assessment of their efficiency and effectiveness. In annex 7, there is a list and details of the reports that have been considered. The results of the above assessment are explicitly documented and reported to the Director-General (acting).

2.1. Control results

Management uses control results to support its assurance and reach a conclusion about the cost-effectiveness of those controls, meaning whether the right balance between the following elements is achieved:

- **Effectiveness** The level of error found, based on the controls carried out.
- **Efficiency** The average time taken to inform or pay.
- **Economy** The proportionality between the costs of controls and the funds managed.

2.1.1. Overview of the budget and relevant control systems (RCS)

DG Competition's portfolio with a low error rate, i.e. <2%, consists mainly of procurement (98.8%) and grants (1.2%). The low error rate is due to the inherent low risk profile of the DG and the performance of the related control systems. The relevant control systems are different based on these two main spending activities, but DG Competition retains a single overall indicator of cost of controls in view of the small size of its budget. The control strategy details are described in annexes 5 and 6.

Risk-type/Activities	In M EUR (payments made)	% of total
Payments to procurement	23.28	97.2%
Payments to grants	0.68	2.8%
Total amounts paid	23.96	100.0%

Concerning internally generated intangible assets (IGIA), the value amounts to EUR 17.1 million at year-end 2025. DG Competition is the domain leader of the corporate case management system Case@EC. Notably, as of September 2021, the project attained full implementation status, marked by its operational launch for the State aid area. Consequently, the project was capitalized as an intangible generated asset. No intangible assets were generated in the year 2025.

The value of competition fines in 2025 amounted to EUR 4.68 billion. More details on fines are set out under section 2.1.2.d)b).

2.1.2. Effectiveness of controls

a) Assessment of control results per segment of expenditure



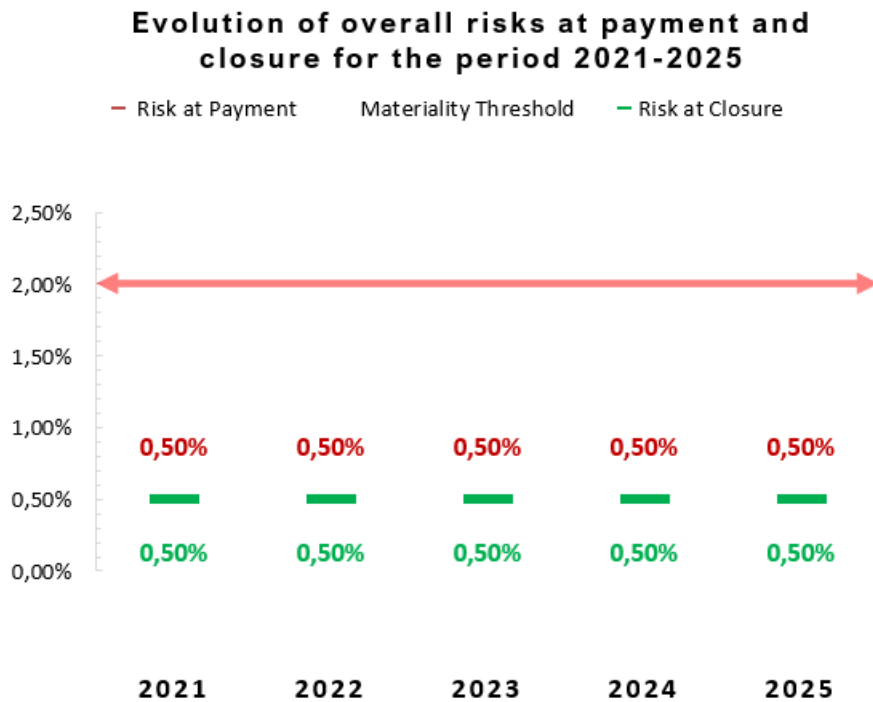
The control objective is to ensure that the Director-General (acting) has reasonable assurance that the total amount of any financial operation authorised during the reporting year, which would not be in conformity with the applicable contractual or regulatory provisions, does not exceed 2% of the total expenditure. All corrections take place before the actual payment is made (ex-ante), and there are no errors left at the moment of payment. As regards the error rate, DG Competition applied the conservative estimate of an average error rate of 0.5%.

Two of the procurement procedures launched in 2025 were subject to a supervisory desk review by the local Advisory Committee for Procurements and Contracts, prior to the signature of the contract. Furthermore, a representative sample (21.74% of the individual commitments value, 23.11% of the total value of payments) of the financial transactions of DG Competition was subject to an ex-post control.

Overall, during the reporting year the controls carried out by DG Competition for the management of the budget appropriations were efficient and cost effective. The total amount of payments verified in 2025 was EUR 5.41 million and the detected error rate on the

payments sampled was 0%. The controls and the measures taken comply with the baseline requirement and give the management sufficient assurance of sound financial management.

b) Estimation of the overall risk at payment and risk at closure



The estimated overall risk at payment for 2025 expenditure amounts to EUR 0.11 million, representing 0.5% of the DG’s total relevant expenditure for 2025 (EUR 25.06 million). This is similar in percentage compared to 2024. The estimated overall risk at payment for 2025 expenditure is the AOD's best conservative estimate of the amount of relevant expenditure during the year, not in conformity with the contractual and regulatory provisions applicable at the time the payment was made. This expenditure was subject to ex-post controls, and the average error rate was 0%. There is a stable positive trend, in view of the stable control environment that is in place and the limited risk in DG Competition’s transactions

For an overview at Commission level, the departments' estimated overall risk at payment, estimated future corrections and risk at closure are consolidated in the Annual management and performance report (AMPR).

c) Quantitative benefits of controls: Preventive and corrective measures

DG Competition continued to perform ex-ante and ex-post controls as an effective mechanism for detecting and correcting errors. In 2025, due to the transition to SUMMA, only preventive measures exceeding EUR 500,000 are reported. All corrections made by DG Competition fall

below this threshold and therefore are outside the reporting scope. Compared to 2024, there is no significant change in both ex ante and ex post control mechanisms.

d) Assessment of control results for non-expenditure items

a) Enforcement and policy actions taken in the area of EU competition policy

Competition law enforcement is carried out in the public interest assessing all evidence objectively subject to the rule of law principle. The process is characterised by impartiality vis-à-vis the parties at all stages of the process and respecting their rights of defence governed by the respective regulations, guidelines and best practices issued for competition proceedings. These are aligned with market realities and contemporary economic and legal thinking. Commission decisions can be subject to appeals or claims for damages, which could lead to substantial financial or reputational loss for the Commission.

The control objective is to ensure that the Commission's competition policy enforcement is of sufficiently high quality to withstand the scrutiny of the EU courts. This contributes to the deterrent effect of competition policy enforcement and avoids undermining the Commission as an enforcer of EU competition policy, by avoiding possible reputational or financial damage.

Ex-ante controls include management structures and procedures for enforcement and policy initiatives, involving the highest political level, expert economic advice of the Chief Economist Team, support by the Chief Technological Officer's team, peer review panels, consultations with other Commission services, opinions by the Legal Service, independent Hearing Officers, a Principal Adviser for ex-post economic evaluation, step-by-step procedures, manuals and consultations to be followed in the daily operations, a tailored governance structure for internal controls, comprehensive knowledge sharing tools and IT systems and support. A dedicated team in DG Competition continuously updates internal instrument-specific Manuals of Procedures to take account of developments and recent jurisprudence. The ex-post controls of the effectiveness of the enforcement of EU competition policy include the Commission's Legal Service yearly analysis and assessment of the litigation by the EU Courts and EFTA Court and audits by the Internal Audit Service (IAS) and the European Court of Auditors.

Implementation of the internal controls in DG Competition during 2025 contributed to the quality of enforcement decisions taken by the Commission in the various instruments of competition policy (antitrust, merger and State aid control, DMA, FSR). The risk management process helped to identify and address the main risks that can prevent the achievement of the set objectives. Potential weaknesses or errors were mitigated and corrected through ex-ante controls.

The implementation of two recommendations in Special Reports 21/2020 and 24/2020 due in 2024 continued and was finalised in 2025. However, such a weakness did not have a material impact on the performance of the Directorate General in terms of the effectiveness of the controls. DG Competition therefore concludes that the effectiveness of the internal control objectives has been achieved.

b) Fines imposed in the area of competition

The control objective is to ensure that the Commission establishes its legal rights in terms of revenue entitlements in Commission decisions and that EU accounting rules are respected and reflect the reality.

The amount for fines and penalties issued in 2025 sums up to EUR 4 682.3 million ⁽⁹²⁾, of which EUR 3 971 million related to antitrust and cartels, EUR 11.3 million to State aid and EUR 700 million to the DMA ⁽⁹³⁾. Fines amounting to EUR 62.7 million were cancelled due to Court judgements. The controls in place ensured that the related decisions were free of errors, that the amounts have been correctly registered and that the reporting at the year-end is true and fair. Follow-up of outstanding amounts in cooperation with DG BUDG and the Legal Service was performed three times during the year.

The analysis of the available control results has not unveiled any weakness that could have a material impact on the legal rights in terms of revenue. DG Competition therefore concludes that it reaches full assurance that the effectiveness of the internal control objective has been achieved.

e) Fraud: prevention, detection, and correction

DG Competition has developed and implemented its own anti-fraud strategy since 2013 based on the methodology provided by OLAF. It is updated every three to four years and was last updated in 2024. Its implementation is being monitored and reported to the management annually through the internal control monitoring process. All necessary actions foreseen for the period 2024-2027 are being implemented.

DG Competition participated to the peer review of other DGs anti-fraud strategies in 2025.

In terms of financial management, the fraud risks and controls have been assessed regularly, and the risk of fraud remains low; thanks to the revised ethics guidance and the several corporate and local specific ethics trainings available, staff has a good level of awareness of the Commission ethics rules and how they apply to DG Competition's work. DG Competition did not receive any financial recommendations from OLAF in 2025. No corrective measures based on OLAF recommendations are reported on in the context of annual monitoring exercises conducted by OLAF, in accordance with Article 11 of Regulation 883/2013 ⁽⁹⁴⁾.

In terms of management of sensitive information and ensuring the data integrity related to the security of IT systems:

- As regard management of sensitive information, DG Competition ensures preventive actions, including internal awareness sessions for newcomers and trainees and

⁽⁹²⁾ This sum excludes interest payments on fines.

⁽⁹³⁾ DMA is jointly enforced with DG CNECT.

⁽⁹⁴⁾ Regulation (EU, EURATOM) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999.

promoting awareness campaigns and specialised trainings on security and cybersecurity organised by central services. The number of inadvertent disclosures of sensitive information are also monitored and reported annually to senior management.

- As regards information processes, the controls in place include the implementation of procedures to protect information, awareness raising of staff on the importance of information security and a reporting/risk assessment mechanism for disclosures. The benefits of these controls include continuous awareness of staff, and a reporting system that triggers follow-up action to prevent similar events from happening in the future. The analysis of the available control results has not shown any weakness that could have a material impact on the security of IT-systems or information held by DG Competition. DG Competition therefore concludes that it reaches full assurance that the effectiveness of the internal control objective has been achieved.
- In the IC structured review and assessment process, DG Competition concluded that some improvements are needed in the evaluation of tenders in procurement procedures. Corrective measures are being taken.

On the basis of the available information, DG Competition has reasonable assurance that the anti-fraud measures in place are effective.

Conclusion

Considering the conclusions of the review of the elements supporting assurance, it is possible to conclude that the internal controls systems implemented by DG Competition provide sufficient assurance to adequately manage the risks related to its operations as well as to the legality and regularity of the transactions. Furthermore, it is also possible to conclude that the internal control systems provide sufficient assurance regarding the achievement of the other internal control objectives

2.1.3. Efficiency of controls

Regarding control efficiency of financial management: DG Competition reached 89% timely payments, amounting to EUR 22.25 million. The average net payment time in 2025 was 18 days. The time to inform beneficiaries in 2025 was 83 days (cf. 125 days in 2024) and the average time to grant for the 2025 calls for proposals ⁽⁹⁵⁾ decreased to 147 days from the deadline to submit proposals (cf. 203.5 days in 2024).

The transition in 2025 to the Commission's new accounting system, SUMMA, has required adjustments to a new system and has impacted budget implementation tasks, processes and financial management activities, particularly during the first part of the year. This has required careful management to ensure the same data quality as in previous years.

Regarding control efficiency of prevention, detection and correction of fraud and irregularities: the controls in place for ethics processes are efficient and provide added value. Such controls include the annual declaration of awareness of conflict-of-interest rules, the compulsory half-day course on ethics for new and returning staff and the automated conflict of interest

⁽⁹⁵⁾ The deadline to submit proposals was set for 24/9/2025; Grant agreements were signed in 2026.

declaration when staff is appointed to a case. With few resources, all these specific tools provide full coverage of the intended audience.

Regarding control efficiency of safeguard of information and IT-systems: many of the guidance and controls on information flows are embedded in the Manuals of Procedures and other existing guidance. This ensures that they are routinely implemented during competition investigations. When information security incidents were detected, staff acted swiftly, and procedures were adapted in line with lessons learned. DG Competition's IT governance body (Document and IT management committee) reviews the IT Risk Register on a yearly basis, evaluating the likelihood and impact of IT risks and discussing mitigation measures. Moreover, each IT project is subject to risk management throughout the project cycle in accordance with the Commission's PM² methodology. IT projects' risk logs are regularly updated, and project status reports are submitted to the EC IT governance at the required intervals. DG Competition applies the EC IT Security Risk Management Methodology (ITSRM) to manage IT Security Risks, ensuring that each IT system has an IT Security Plan (ITSP).

Fines imposed in the field of EU competition law can have a high monetary value. However, the stable regulatory environment relating to their processing and collection reduces the risk of encoding errors significantly. An automatically generated monthly list of competition decisions with fines is circulated to ensure a timely encoding. In 2025, fines imposed were introduced into the accounting system in correct and timely manner and the accounts therefore reflect the value of the assets concerned.

2.1.4. Economy of controls

The principle of economy requires that the resources used by the institution in the pursuit of its activities shall be made available in due time, in appropriate quantity and quality and at the best price.

The activities of DG Competition are specific, and so are the risks. Despite the relatively limited volume of payments (EUR 23.7 million) and budget (EUR 24.2 million), the financial stakes, affected by the quality of decisions prepared by DG Competition, although independent from the Voted Budget, are perceived higher:

The risk exposure is also coupled with risks associated with:

- potential claims for damages related to enforcement tasks; and
- high reputational risk related to Commission's enforcement decisions challenged before courts and annulled by courts.

The exposure related to those risks cannot be monetarised but is considered high - significantly higher than the payments and the total budget. In this situation, the cost of controls cannot be measured against the payments (or budget) and needs to be commensurate with the combined exposures related to risks affecting recovery decisions, amounts recovered and on-going efforts on pending recovery cases. These considerations need to be taken while reading this sub-chapter and related information in annex 7.

In terms of cost of control as regards legality and regularity in financial management: it is estimated that 9.6 full time staff are attributed to ex-ante controls of procurement and grants

procedures, in addition to the base line controls as required by the Financial Regulation such as the "four eyes" principle. Ex-post controls accounts for 0.8 full time equivalent (FTE). In total, the cost of controls represents 10.4 FTE e.g. approximately EUR 1.81 million (EUR 1.65 million for ex-ante controls and EUR 0.16 million for ex-post controls) or equivalent to 7.23% of total expenditure. This is a slight increase compared to 2024 when the total costs of controls represented 6.9% of total expenditure. In terms of cost of control regards prevention, detection and correction of fraud and irregularities: the cost of prevention is estimated at 0.3 FTE, which includes the tasks related to anti-fraud and ethics by the local ethics/anti-fraud contact point and the HR Correspondent.

In terms of cost of control as regards safeguard of information and IT-systems: The controls in this area include the follow-up of the IT Risk Register, the preparation of IT security risk assessments and IT security plans for new information systems, as well as the time dedicated to IT security tasks by staff working on local systems administration, project management and operations management, and the functions of Local Informatics Security Officer. The cost is calculated as the FTEs of the statutory staff involved in these security controls (a total of 0.575 AD and 0.65 AST FTEs or EUR 230 300). The costs incurred on contracts for External Service Providers and for the c-LISO service fee amounts to EUR 206 000. The overall cost of these controls is therefore EUR 436 300. Before a fine decision is adopted, it undergoes internal controls. These controls ensure that the decision is legally and procedurally robust not to undermine the Commission's legal entitlement to the revenue. The cost of these controls is intrinsically linked to controls in enforcement and policy action taken in the area of EU competition policy and therefore difficult to extract and measure (cf. 3.d).

2.1.5. Conclusion on the cost-effectiveness of controls

Based on the most relevant key indicators and control results reported above, department DG Competition has assessed the effectiveness, efficiency and economy of its controls of its financial management and reached a positive conclusion on the cost-effectiveness of the controls for which it is responsible.

2.2. Audit observations and recommendations

This section sets out briefly the state of play for all audit observations and recommendations reported by auditors related either to performance aspects or to internal control and financial management. Further details for IAS and ECA audits can be found in Annex 8. Where an audit has detected weaknesses affecting an internal control principle or the department's assurance, a detailed analysis is provided further below in section 2.3. and, where applicable, the incidence on the AOD's assurance is presented in section 2.4, accordingly.

Internal Audit Service

In 2025 DG Competition was not subject to an audit by the IAS. All recommendations foreseen to be implemented in 2025 have been implemented.

Reported	Audit Title	Accepted Recommendation (critical or very important)	State of play in 2025	Impact on the assurance for 2025
2023	CASE @ EC project in DG Competition	2. (very important)	✓	✓
		3. (very important)	✓	✓

State of play

Assurance



Action plan implemented or awaiting review from IAS



No impact on the assurance



Action plan implementation is ongoing



Impact on the assurance



Preparation of the action plan

European Court of Auditors

In 2025, DG Competition implemented fully the accepted recommendation 1 of the Special Report 21/2024 on State aid in times of crisis due in 2025 and continued to implement recommendations 2 and 3, which are due later. In 2025, DG Competition also completed the implementation of two ECA recommendations in ECA's Special Reports 21/2020 and 24/2020:

Reported	Audit Title	Accepted Recommendation	State of play in 2025	Impact on the assurance for 2025
2024	21/2024 State aid in times of crisis ⁽⁹⁶⁾	1.	✓	✓
		2.	⌚	✓
		3.	⌚	✓
2020	21/2020 Control of State aid to financial institutions in the EU ⁽⁹⁷⁾	1.	✓	✓
2020	24/2020 The Commission's EU merger control and antitrust proceedings ⁽⁹⁸⁾	2.	✓	✓

State of play

Assurance



Action plan implemented



No impact on the assurance



Action plan implementation is ongoing



Impact on the assurance



Preparation of the action plan

⁽⁹⁶⁾ See: [Special Report 21/2024: State aid in times of crisis | European Court of Auditors.](#)

⁽⁹⁷⁾ See: [Special Report 21/2020: Control of State aid to financial institutions in the EU: in need of a fitness check](#)

⁽⁹⁸⁾ See: [Special Report No 24/2020: The Commission's EU merger control and antitrust proceedings: a need to scale up market oversight | European Court of Auditors.](#)

2.3. Assessment of the effectiveness of internal control systems

The Commission has adopted an Internal Control Framework based on the highest international standards. ⁽⁹⁹⁾ DG Competition has adapted the Internal Control Framework to its specific characteristics and organisational structure. The internal control systems are suited to achieving its policy and internal control objectives in accordance with the internal control principles, having due regard to the risks associated with the environment in which it operates.

In line with the Commission's Internal Control Framework DG Competition has assessed its internal control system during the reporting year and has concluded that it is effective, and the components and principles are present and functioning well overall, but some improvements are needed as some deficiencies were identified related to the evaluation of tenders in procurement procedures. Corrective measures are being taken. In particular, DG Competition successfully introduced the central tender assessment templates, a guidance for the evaluation committees and a checklist.

2.4. Conclusions on the assurance

Considering the review of the elements supporting assurance, it is possible to conclude that the internal controls systems implemented by DG Competition provide sufficient assurance to adequately manage the risks related to its operations as well as to the legality and regularity of the transactions. Furthermore, it can also be concluded that the internal control systems provide sufficient assurance regarding the achievement of the other internal control objectives.

The systematic analysis of the available evidence provides sufficient guarantees as to the completeness and reliability of the information reported and results in the full coverage of the resources assigned to DG Competition.

In conclusion, based on the elements reported above, management has reasonable assurance that, overall, effective controls are in place and working as intended; risks are being appropriately monitored and mitigated; deficiencies identified (as in 2.3) have no impact on the declaration of assurance, and necessary improvements and reinforcements are being implemented. The Director-General (acting), in her capacity as Authorising Officer by Delegation has signed the Declaration of Assurance.

⁽⁹⁹⁾ The Committee of Sponsoring Organizations of the Treadway Commission Internal Control Integrated Framework, the golden standard for internal control systems.

2.5. Declaration of Assurance

Declaration of Assurance

I, the undersigned,

Director-General of DG Competition

In my capacity as authorising officer by delegation

Declare that the information contained in this report gives a true and fair view ⁽¹⁰⁰⁾.

State that I have reasonable assurance that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principles of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions.

This reasonable assurance is based on my own judgement and on the information at my disposal, such as the results of the self-assessment, ex-post controls, the work of the Internal Audit Service and the lessons learnt from the reports of the Court of Auditors for years prior to the year of this declaration.

Confirm that I am not aware of anything not reported here which could harm the interests of the institution.

Brussels, 30 March 2026

(signature)

Linsey McCallum

Director-General (acting)

⁽¹⁰⁰⁾ True and fair in this context means a reliable, complete and correct view on the state of affairs in the DG/Executive Agency.

3. A MODERN AND SUSTAINABLE PUBLIC ADMINISTRATION

3.1. Human resource management

During 2025, DG Competition continued to improve its human resource management and ensured that its resources were effectively allocated to its priorities. To secure a continued flexible and effective resource allocation across units, directorates and instruments, DG Competition kept and refined the [matrix organisation](#) that has served well over the years.

DG Competition continued to implement its [local HR strategy action plan](#) in line with the overall Commission HR strategy and considering the results of the 2023 staff survey. The main actions implemented in 2025 focused on “Talent”, “Leadership & Management”, “Workplace & Wellbeing” and “Organisation & Culture”. The implementation was further validated in 2025 through 55 entry interviews, 69 exit, and 25 career development interviews with staff members. The implementation of DG Competition’s ‘[10 DOs for people management](#)’ (charter for good people management) was monitored through the different interviews with staff members. In 2025, as part of DG Competitions Local HR Strategy, DG Competition continued conducting an [180° feedback exercise](#) for DG Competition's Deputy Heads of Unit.

In the [2025 staff survey](#), DG Competition’s staff engagement index remained high with 83% as per the new calculation of the staff engagement index, and 78% according to the old calculation of the staff engagement index. In both cases, the index is higher than the Commission average (in 2025 old index calculation – EC average 73% and 79% EC average according to the new index calculation). The Commission average in 2023 was 73%.

Under the [Staff exchange programmes](#) with other DGs initiated in 2023, an exchange took place in 2025. The programme allows colleagues to benefit from a four-week job shadowing in another DG. A limited number of colleagues from other DGs were also hosted by DG Competition. A new call was launched in 2025 and six colleagues from DG Competition have been selected to get to know new policies and learn new working methods in 2026. As part of the [Senior Experts career track](#), the Senior Experts in DG Competition continued to offer inhouse training courses in 2025. In 2025, DG Competition continued promoting [gender balance](#) in middle management positions. In addition to the [Female Talent Development Programme](#) organised at overall Commission level, DG Competition continued to organise together with DG ECFIN, DG FISMA and DG GROW a [cross-DG talent development programme](#) for female staff who aspire to become managers. In 2025, 24 colleagues, six from each DG, participated.

DG Competition is committed to giving all staff equal opportunities independent of their background and to respect the principle of non-discrimination in all its forms at all stages of HR management. [The Equality Network](#) of DG Competition in close cooperation with the COMP HR Correspondent Team planned and carried out various actions including a lunchtime panel discussion on “Equality and non-discrimination in competition law workplaces”, Communication actions on promoting equality through different campaigns and initiatives. Various local Be Well at Work and well-being activities, tailor made to DG’s needs were organised and took place in 2025.

3.2. Digital transformation and data management

Digital Transformation and cybersecurity

In 2025, DG Competition continued to **foster a robust digital culture** within the organisation. Several initiatives took place to enhance cyber awareness, including the Cyber Roadshow in May and the Be Prepared event in October. Comprehensive training sessions on DG Competition's IT tools were conducted, with more than 30 trainings organised, engaging over 500 participants. The eLearning catalogue was expanded to offer new tutorials. Numerous presentations on Artificial Intelligence (AI) were delivered, including two events to all COMP staff and one dedicated to COMP Senior Managers and two AI champions were nominated. Last, DG Competition remained engaged in EC fora such as the IT and Cybersecurity Board, the Digital Stakeholders Forum, and the Inter-Service Working Group on AI.

A notable success in **digital-ready policy making** was the delivery of the new eAidRegister. This new solution assists Member States in complying with the reporting requirements of the updated State aid de minimis De-Minimis Regulations ⁽¹⁰¹⁾. Effective cross-team collaboration ensured the implementation of a solution that met legislative demands, within the required timeline. Moreover, collaboration between business and IT continued through the year in analysing digital support for the reviewed EU Antitrust Regulation (Regulation 1/2003).

DG Competition **digital transformation remained firmly business-driven** in 2025, with ten DIT ⁽¹⁰²⁾ meetings taking place, during which, the COMP Digital Strategy 2025-29 was endorsed, and the IT Work Plan and Budget 2026 were approved. In terms of digital transformation, significant upgrades were made to the corporate case management platform, CASE@EC, including the migration of the antitrust/cartels instrument and the introduction of a more user-friendly Case Library module. Progress was made as well in migrating remaining competition instruments, notably mergers. The new eDiscovery platform, featuring AI and Technology Assisted Review capabilities, was successfully piloted with real cases and adopted. Moreover, DG Competition further enhanced its portfolio of cross-border digital solutions supporting collaboration with Member States and businesses. In addition to the new eAidRegister, progress was achieved in the implementation of the new eNotifications solution, which will offer a single, user-friendly portal for submitting notifications across various instruments. The overhaul of the tool supporting collaboration within the European Competition Network advanced and is set to become operational in 2026. Finally, enhancements were made to the eConfidentiality and eRFI solutions to support the Digital Markets Act and the Foreign Subsidies Regulation.

In 2025, DG Competition continued to tackle technical obsolescence and **ensure a seamless digital environment**. Progress was made to phase out remaining legacy applications based on

⁽¹⁰¹⁾ https://competition-policy.ec.europa.eu/state-aid/legislation/regulations_en

⁽¹⁰²⁾ The DIT (Document handling and IT systems group) acts as the IT Steering Committee of DG Competition, bringing together business and IT, and steering the definition and implementation of the DG's digital strategy to make sure that the digital solutions implemented in the DG match the business needs.

ColdFusion in 2026. Digital sovereignty, and the reuse-buy-build principles, remained integral to DG Competition's digital strategy, with new solutions such as eAidRegister and eNotifications achieving re-use rates of over 70% and 90%. Analysis to adopt additional RSPs, including Corporate Kafka or COMPASS Corporate was initiated. The transition to cloud infrastructure gained momentum with the newly developed eAidRegister fully operational on public cloud, and most solutions adapting their architecture to become cloud-ready.

As regards **green, resilient and secure infrastructure**, IT Security Plans (ITSPs) for new digital solutions were drafted and approved. New security control measures required by the corporate IT security policies have been implemented. DevSecOps practices have been further adopted and matured. Last, significant optimisation were implemented in the use of digital infrastructures to reducing DG Competition's footprint and become more cost-efficient.

Data management

A wide range of data-driven activities take place in DG Competition, from routine administrative processes (such as registry data entry), acquisition of third-party information sources and datasets, case-specific data curation (e.g. in merger control and by the Chief Economist Team), as well as secure storage and advanced analytical and forensic work. Data governance operates in a specific context, as a **large share of its data assets is sensitive and confidential**, may be used only for investigative purposes and cannot be further shared.

In 2025, DG Competition continued implementing the Commission's corporate data governance guidance set by the Information Management Steering Board (IMSB). The DG also strengthened data management and standardisation practices, for example, by improving the harmonised description of data assets within DG Competition tools, and by continuing the registration of externally acquired datasets and case-related data in the EC Data Catalogue. In addition, a paper outlining **an action plan** on data governance, including further development of roles and responsibilities, was prepared in 2025. Regarding the 2025 data maturity baseline, DG Competition assesses its **data management, data quality and data skills as established**, while **data ownership and responsibilities remain developing**. As such, the **overall data maturity level of DG Competition can be considered as established**.

Data Protection

in 2025, DG Competition continued to ensure compliance with the EU data protection framework, notably with the general principles in the regulation, by **reviewing every two years its data processing operations**. In addition, the Data Protection Coordinator (DPC) team **raised awareness** on data protection through centrally organised courses and specific action: advertising of training sessions at corporate level, presentations in internal meetings, and internal blog posts. The DPC team maintains regular contacts with colleagues involved in processing operations and regularly updates the dedicated intranet section. In 2025, the DPC team also **exchanged with national competition authorities** on data protection issues in the context of competition investigations. The DPC team follows relevant and advanced training organised by the Commission's DPO and participates in the work of the DPO-DPC network.

3.3. Sound environmental management

Throughout 2025, DG Competition actively supported and rolled out the Commission's corporate EMAS (*Eco-Management and Audit Scheme*) actions at local level, contributing concretely to the objectives of the European Green Deal. A strong focus remained on **limiting the environmental footprint of daily operations**, with particular attention given to professional travel. Staff were consistently encouraged to choose more sustainable transport options, while the expanded use of videoconferencing helped reduce the need for travel. Based on 2025 data, CO₂ emissions related to staff travel (missions) have decreased significantly over time. Compared with the 2019 baseline, emissions in 2025 show an overall reduction of 57%.

DG Competition also helped **reduce the environmental impact of the building** by cutting energy use, CO₂e emissions, waste and paper consumption. These efforts were followed through the yearly **COMP EMAS action plan**, managed by the local EMAS team. As part of the Commission's energy-saving initiatives, DG Competition participated in the summer and end-of-year campaigns, which included closing the building for a few weeks to limit energy consumption.

DG Competition colleagues participated actively in initiatives promoting sustainable mobility and healthier habits, such as the **VeloMai campaign**, with 57 cyclists taking part in 2025, almost double the number from 2024. Additional initiatives further strengthened DG Competition's sustainability culture. **A clothes swap event** was organised to encourage second-hand use, helping to limit new production and directly reduce CO₂ emissions. The ongoing **bottle-top** collection project in the building continued supporting circular economy practices. In 2025, the EMAS team of DG Competition was strengthened by new volunteers, which broadened the teams' capacity to act. Work is currently underway on a dedicated document to introduce EMAS actions and objectives to newcomers. On a day-to-day basis, the team continues to actively support corporate EMAS campaigns, while also launching new awareness efforts locally.