

Management Plan 2021 EUROPEAN ANTI-FRAUD OFFICE (OLAF)

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INTRODUCTION

As presented in the Strategic Plan 2020-2024, the European Anti-Fraud Office (OLAF) is the central service of the Commission that according to its mandate and mission is in charge of protecting EU revenues and expenditure through independent investigations into fraud and corruption involving EU funds. OLAF is also responsible for investigating serious misconduct by EU staff and members of the EU Institutions. Besides its investigative work, OLAF coordinates the implementation of the Commission Anti-Fraud Strategy and develops fraud risk analysis and anti-fraud policy measures to support all Commission services in preventing and fighting fraud and irregularities and building a legal framework for a better protection to the EU budget. At the same time, OLAF's everyday work and mission meaningfully contribute to upholding the rule of law in the EU.

OLAF ensures that EU taxpayers' money reaches projects that can stimulate the creation of jobs and growth and contributes to strengthening citizens' trust in the EU institutions and the entire EU project.

OLAF's mission and political priorities are guided by the Treaty and further defined by the political framework for the Commission services set out in the President's six headline ambitions and in a seventh horizontal objective: "A modern, high-performing and sustainable European Commission".

The purpose of this management plan is to present the **main priorities and unprecedented challenges ahead of OLAF in 2021.** It takes into account the current economic, political and sanitary context as well as a significantly evolving anti-fraud landscape.

Most importantly, as a result of the **COVID-19 pandemic**, OLAF has activated business continuity measures to ensure a fully operational office in a situation with almost all staff teleworking. Access to IT infrastructure and other critical processes have been adapted to secure a continuous remote access of OLAF investigators to its case management system. This allowed OLAF investigators to continue operations without interruption. For that reason and if the pandemic is to continue in 2021, OLAF will remain fully operational.

This is important bearing in mind the future funding stemming from the reinforced Multiannual Financial Framework (MFF) 2021-2027 and Recovery and Resilience Facility (RRF). Precisely, OLAF will be involved in screening anti-fraud requirements, which should be reflected in the Council Implementing Decisions approving the national recovery plans and/or in the related acts (e.g. operational arrangement and financing agreement) as per Article 19(2) of the proposed Regulation. This is to make sure that the money is well spent and in line with Union objectives to support a sustainable and resilient recovery with green and digital priorities, to create jobs and to finance repair of the damage caused by the COVID-19 pandemic. OLAF will also be involved in fraud-proofing of the future new own resources. The increased financial resources together with the pandemic clearly raise

financial and other risks jeopardising EU funds. Therefore, it is particularly important that OLAF is equipped with proper legal and financial means to effectively manage these risks.

Regulation (EU, EURATOM) 2020/2223 amending Regulation (EU, EURATOM) No 883/2013 ('OLAF Regulation') entered into force on 17 January 2021, in good time before the **European Public Prosecutor's Office ('EPPO')** becomes operational. This legislation is relevant in particular for defining the cooperation and working arrangement between OLAF and the EPPO. To prepare for the start of the new partner, OLAF is working on adapting its current rules and procedures to facilitate future cooperation and has finalised the working arrangements with the EPPO.

Given the cross-border dimension of fraud, OLAF will continue **working closely with authorities from across the EU and worldwide** as well as with Europol, Eurojust, Frontex, Interpol, Ameripol, the World Customs Organization and soon the EPPO, and will seek to improve coordination and collaboration between these actors.

OLAF is also ready to maintain its engagement in supporting Member States in enforcing the EU legal framework. The Commission has adopted over the last months several policy communications with action points related to OLAF's activities; among them the Single Market Enforcement Action Plan, the Farm to Fork Strategy, the Biodiversity Strategy, the Chemicals Strategy for Sustainability and the Intellectual Property Action Plan. Within its current mandate, OLAF has stepped up its operational activities in the area of food fraud, environment and intellectual property rights. Drawing on this experience, OLAF is working with other Commission services to translate the OLAF-related policy actions into legislative proposals. Upcoming sectoral legislation could provide the Office with **strengthened investigative capacity to support these new Commission's initiatives.** In any case, OLAF will continue to step up its efforts to discover fake and unsafe goods, unhealthy food stuffs and environmentally dangerous goods.

In addition, OLAF will pursue its efforts in working in the area of combatting and preventing **anti-money laundering**. OLAF will host FIU.net, the IT system used by the EU Financial Intelligence Units (FIUs) to exchange information and match data on suspicious transactions to combat money laundering and terrorist financing.

Finally, OLAF will continue its positive engagement with its **Supervisory Committee** to further enhance the working arrangements in pursuit of shared objectives.

Communicating to the public how OLAF protects the interests and ensures the safety of European citizens serves not only to raise awareness of OLAF but to boost confidence and trust in the EU and its institutions. Given its independent investigative mandate, OLAF has its own Spokesperson's team who liaises directly with media on matters pertaining to the investigative process.

In 2021, OLAF will first and foremost adapt its investigative procedures and practices to the new investigative modalities and powers as provided in the revised OLAF regulation.

The Office will continue its efforts to prepare for a seamless and efficient cooperation with the EPPO and other OLAF partners in the new anti-fraud landscape. OLAF will strive to decrease the target for average duration of closed selections and maintain all the other ambitious targets under a Specific objective 1. A dedicated task force set up to strengthen the follow-up of OLAF recommendations will review the outcome of all financial recommendations since 2012 to make recovery action more effective in the following years. In the area of mutual administrative assistance in customs matters, an evaluation of Regulation (EC) No 515/97 is ongoing and the Commission will assess whether there is a need for its revision.

The seven specific objectives mentioned below describe how OLAF intends to contribute to the achievement of the political framework of the Commission:

- 1: Efficient and effective management of OLAF's investigations investigative work and recommendations
- **2: Compliance with legal obligations under Regulation (EU) 2018/1725** requests for access to personal data
- **3: Cooperation between OLAF and the EPPO to ensure better protection of the EU's financial interests** revised Regulation (EU, EURATOM) No 883/2013 (the OLAF Regulation) and working arrangements between the two offices
- 4: Strengthen EU framework to combat customs fraud
- 5: Strengthen EU framework to fight illicit tobacco trade
- 6: Implementation of the Commission Anti-Fraud Strategy (CAFS) to protect the EU's financial interests support to Commission services in anti-fraud cycle
- 7: Protection of the EU's financial interests through the EU Anti-Fraud Programme actions under the EU Anti-Fraud Programme as part of the Multiannual Financial Framework 2021-2027.

PART 1. Delivering on the Commission's priorities: main outputs for the year

Specific objective 1: Efficient and effective management of OLAF's investigations

The Office's core business is its investigations. They will be impacted by the new tasks and challenges in 2021. Hence, all the more they have to be managed efficiently and effectively.

OLAF has investigated and will be able to pursue investigations also through the COVID-19 pandemic. Factors that could have an impact on the investigative capacity are for example the new tasks related to the cooperation with the EPPO and new tasks related to fraud in the health and environment sectors. The operational work will continue to rely on OLAF's extensive cooperation with partners at EU level (EUROPOL, EUROJUST, FRONTEX, EUIPO), administrative bodies, customs authorities and police and judicial services in the Member States as well as in third countries worldwide, and international organisations (INTERPOL, AMERIPOL, the World Customs Organization, the World Health Organization).

The activities under this objective focus on the selection of cases to be opened by OLAF, the conduct of investigations and coordination activities, as well as the implementation of recommendations issued by OLAF as a result of its investigative and coordination activities.

The first step in the selection phase is to establish whether OLAF is competent to investigate. Once this is confirmed, the available information is examined in accordance with Regulation (EU, EURATOM) No 883/2013, in order to determine whether there is sufficient suspicion that there has been fraud, corruption, any other illegal activity affecting the financial interests of the Union, or serious wrongdoing by EU staff or a member of an Institution. Only after establishing the competence and the existence of sufficient suspicion do OLAF selectors proceed to the analysis of the criteria of (i) proportionality, (ii) efficient use of investigative resources and (iii) in particular with regard to internal investigations, the institution, body, office or agency best placed to conduct them, based, in particular, on the nature of the facts, the actual or potential financial impact of the case, and the likelihood of any judicial follow-up. The opening and carrying out of an investigation is done by OLAF in full independence, without instructions from any government, institution, body, office or agency.¹

The selection process is under revision to be adapted to the amended OLAF Regulation and to the entry into operations of the EPPO. OLAF will be obliged to consult the EPPO during the selection process to guarantee the "non duplication" of investigations. The extra

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¹See Article 17(3) of Regulation (EU, EURATOM) No 883/2013.

deadline that the EPPO will be given to provide a response will be a factor to take into consideration when estimating the length of the future selection process. It might extend the duration of the selection phase. Therefore, it is difficult to assess and quantify exactly, at this stage, what impact those new obligations imposed will have on the selection process in 2021. It is the Office's ambition to keep the target as regards the average duration of selections as low as possible, but given the circumstances a realistic target for 2021 is the target of 2.1 months.

As a result of its investigations, OLAF issues recommendations to the EU institutions, bodies, offices and agencies as well as Member States. Such recommendations aim at recovering monies unduly spent on projects affected by irregularities (financial recommendations), at improving procedures or tightening the follow-up of individual cases of irregularities (administrative recommendations), at sanctioning misconduct inside EU institutions and bodies (disciplinary recommendations) or at prosecuting fraudsters under Member States' criminal law (judicial recommendations).

In 2020, OLAF set up a dedicated task force to strengthen the follow-up of its recommendations and also reviewed the outcome of its financial recommendations since 2012. A detailed analysis of this review will be presented in 2021 and should ultimately result in even more effective recovery action over the following years.

On the basis of its investigative and operational function, OLAF can provide advice and support to Commission services on anti-fraud issues. The outcome of this advice is, notably, administrative recommendations, ad hoc notes and replies to inter-service consultations.

For 2021, targets regarding the outputs for investigations, financial recommendations and advice on anti-fraud matters will remain at the same level as for 2020.

Specific object OLAF's investig		Related to spending programme(s): No				
Main outputs in	Main outputs in 2021:					
Other important	Other important outputs					
Output			Indicator	Target		
Speedy initial whether a case sh	assessment nould be opened	of	Average duration ² of closed selections (in months)	2.1 months		
Reasonable investigations	duration	of	Average duration of closed investigations (in months)	24.3 months		
Reasonable	duration	of	Percentage of ongoing	29%		

² The duration being the time between the decision to open a selection and the decision of the Director-General to either open an investigation or dismiss the case

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investigations	investigations lasting more than 20 months	
Implementation of OLAF's financial recommendations	Financial impact Average of the amounts established for recovery and of the amounts prevented from being unduly spent or evaded in year N and year N-1, compared to the average OLAF's administrative budget for the same period	Ratio > 3.5 / 1
Provision of advice on anti-fraud matters to Commission services through administrative recommendations, ad hoc notes and interservice consultations	OLAF provides advice on anti-	50

External communication

Protecting the interests and ensuring the safety of European citizens is at the heart of what the European Anti-Fraud Office, OLAF, does. Communicating this role to the citizens of Europe is a vital part not only of raising awareness of OLAF but also of boosting confidence and trust in the European Union project and its institutions.

Given its independent investigative mandate, OLAF has its own Spokesperson and Spokesperson's team who liaise directly with media on matters pertaining to OLAF's investigative process and as well as its own external communication policy. The communication and information activities of OLAF are carried out in accordance to its legal obligation prescribed by EU and national law to protect the confidentiality of its investigations, the principle of judicial secrecy and the need to respect individual fundamental rights and procedural guarantees of persons concerned by OLAF's investigations.

In 2021, OLAF's external communication activities will mainly be targeted towards media and expert stakeholders, with a continued effort to create more synergies with corporate communication campaigns developed by the Directorate-General for Communication around the European Commission's main political priorities.

OLAF's primary communication objective is to raise awareness of the Office's operations and mandate, and strengthen the reputation of and the trust in OLAF by:

- explaining OLAF's unique and crucial role in defending both financial and other interests of European citizens, as well as in helping to keep Europe and its citizens safe, healthy and fit for the future;
- increasing transparency and visibility for tangible results of OLAF's activities, whilst

maintaining a high level of protection for our key procedural guarantees.

The main messages that OLAF aims to pass with its communication activities are:

- OLAF is a professional and highly competent body it conducts complex, cross-border, independent administrative investigations into matters that concern all European citizens. OLAF is an anti-fraud knowledge centre and uses its accumulated investigative expertise and experience to improve fraud prevention across the EU and beyond. Its anti-fraud efforts ensure that European money can go to meaningful projects that improve the lives of EU citizens and of citizens of non-EU countries to which the EU provides financial assistance.
- **OLAF does not and cannot work alone.** The cooperation of national investigative and judicial authorities, other EU bodies, partner authorities in non-EU countries, international organisations and European citizens themselves is crucial to OLAF's work. European citizens must be well aware of the different channels available to report cases of fraud.
- **Fraud is not a victimless crime.** The European citizens, the taxpayers, are the ultimate victims of fraud to the EU budget. OLAF protects their money, their interests, and their well-being. The role of OLAF in protecting resources made available in the new MFF and RRF will be crucial in helping a swift recovery of the EU following the miseries of 2020.

In addition to the traditional communication mix consisting of increasingly pro-active press and media relations, together with the publication and promotion of the annual OLAF Report, the OLAF communication activities plan to also include:

- Developing more narratives on non-strictly operational results of OLAF's investigative work, in order to create easily quotable content without running into risks of legal claims;
- Increasing presence on social media, in particular in view of the enormous shift towards the virtual world in all communication fields caused by the Coronavirus pandemic measures;
- Increasing the use of audio-visual content for more engaging and easily sharable messages. The content shall be adapted to the format usable on smartphones, as this will clearly be the most used communication channel in 2021.

Traditional outreach events with physical presence of participants will be held virtually. OLAF will seek synergies with communication activities of not only the Directorate-General for Communication, but of Eurojust, Europol and the European Public Prosecutor's Office (EPPO).

Objective: OLAF communicates in a clear engaging way to raise awareness of its operations and mandate, strengthening the reputation of, and trust in, OLAF, the European project and the EU institutions

Main outputs in 2021:

External communication actions						
Output	Indicator	Target				
Popularity of OLAF's external website	Number of visitors of OLAF's external website	> 250 000 (289 375 in 2020)				
Impact generated by press releases	Number of online views of Media corner section of OLAF website	> 70 000 (79 872 in 2020)				
Growing level of engagement reached via social media	Number of impressions [social media metric]	> 400 000 (480 000 in 2020)				

Specific objective 2: Compliance with legal obligations under Regulation (EU) 2018/1725

Regulation (EU) 2018/1725³ requires controllers to respond to a data subject's request for access to his/her own personal data, rectification, erasure thereof, blocking or objection to the processing thereof, without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. Within the scope of its investigative function, OLAF acts as a controller independently from the Commission. OLAF's legal advice unit handles these requests in close cooperation with the units directly involved in the investigative activities.

Requests for access to personal data may involve the scrutiny of many and large files, containing sensitive information collected during OLAF investigations. OLAF checks carefully whether any restrictions to the data subjects' rights specified in Decision (EU) 2018/1962⁴

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³ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295, 21.11.2018, p. 39).

⁴ Commission Decision (EU) 2018/1962 of 11 December 2018 laying down internal rules concerning the processing of personal data by the European Anti-Fraud Office (OLAF) in relation to the provision of information to data subjects and the restriction of certain of their rights in accordance with Article 25 of Regulation (EU) 2018/1725 of the European Parliament and of the Council (OJ L 315, 12.12.2018, p. 41).

apply as it is extremely important to protect the identity of informants and other persons relevant to OLAF investigations, to safeguard the investigation activities of OLAF and related activities of EU institutions, bodies, organs and agencies (IBOA) and Member States' authorities, as well as information which could impinge on the integrity and reputation of interested parties. Likewise, OLAF handles incoming consultation requests from Commission services and executive agencies in accordance with Decision (EU) 2018/1962 and from other IBOAs following their own respective internal rules, without undue delay to assist in responding to the time limits equally set to all IBOAs.

OLAF aims to carry out this analysis with due diligence and to involve all relevant stakeholders. Nevertheless, the time-limits set by Regulation (EU) 2018/1725 are tight in practice. This can lead to a small number of requests being responded to after the expiry of the applicable time-limits, due to particular circumstances. In any event, OLAF aims to respond positively to access to personal data requests as promptly as possible, while taking into account any necessary applicable restrictions specified in Decision (EU) 2018/1962.

Specific objective 2: Compliance Regulation (EU) 2018/1725	with legal obligations under	Related to spending programme(s): No
Main outputs in 2021:		
Other important outputs		
Output	Indicator	Target
Timely replies	Percentage of replies to data subjects' requests (access to personal data, rectification, blocking, erasure, objection) within 3 months from registration	80%

Strengthening anti-fraud policy and legislation

Beyond its investigative work, OLAF has conceived four specific objectives related to anti-fraud policy and legislation, which are described in the sections below.

Protection of the financial interests of the EU by developing anti-fraud policy, strengthening legislation and enhancing cooperation with the EPPO, the Member States and other partners is essential for OLAF's investigative and policy work.

As regards the Commission Work Programme for 2021, OLAF aims to take an active role in the preparation and fraud proofing of policy initiatives that have an impact on the EU budget or concern the remit of OLAF, for example legislation on new own resources, as well as initiatives related to customs fraud and anti-money laundering.

Specific objective 3: Cooperation between OLAF and the EPPO to ensure that the EU's financial interests are better protected

The operations of the EPPO will improve the fight against crimes affecting the EU's financial interests and increase the effectiveness of the criminal law response to fraud in the participating Member States. In order to ensure that in the future anti-fraud landscape all available means will be used to fight fraud and corruption harming the EU's financial interests, it is necessary to establish close relations with all stakeholders involved in the protection of those financial interests, including between the EPPO and OLAF.

OLAF's objective is to be a strong partner that supports and complements the EPPO in the investigations for which the EPPO is competent. At the same time, OLAF will continue acting as it does today by conducting investigations with the possibility of issuing a judicial recommendation, when the EPPO is not competent. Furthermore, OLAF will be at the forefront of anti-fraud action in cases not taken up by the EPPO but calling for administrative action.

OLAF is responsible, jointly with the Directorate-General for Justice and Consumers, for two legal acts that strengthen the protection of the EU's financial interests by means of criminal law: Regulation (EU) 2017/1939 (the 'EPPO Regulation') and Directive (EU) 2017/1371 (the 'PIF Directive').

Regulation (EU) 2017/1939 implementing enhanced cooperation on the establishment of the EPPO entered into force on 31 October 2017. The EPPO Regulation⁵ contains basic rules concerning the relationship between OLAF and the EPPO, mirrored and complemented in the framework of the revision of the OLAF Regulation (Regulation (EU, EURATOM) No 883/2013).

To organise cooperation between the two offices and to achieve the strongest possible response to fraud, OLAF and the EPPO concluded negotiations on the working arrangements in November 2020. OLAF is also contributing to the work on the working arrangement between the Commission and the EPPO.

The detailed rules on complementary investigations in the amended OLAF Regulation, further detailed in the OLAF-EPPO working arrangements, should allow the continued action of OLAF for financial recovery, or administrative precautionary measures, while ensuring that the EPPO can carry out its investigations. A well-functioning exchange of information and mutual reporting of cases will be essential. OLAF and EPPO will be important sources of cases for each other. Consequently, the two offices will reinforce and complement each other's competences to ensure that no case goes unreported.

⁵ Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO') OJ L 283, 31.10.2017, p. 1-71

The EPPO is expected to become operational at the beginning of 2021. The Commission, on a proposal of the European Chief Prosecutor, will adopt a decision setting the starting date of operations of the EPPO. In order to proceed to the adoption of this decision, the Commission will need to assess the preparedness of the EPPO and the participating Member States.

Directive (EU) 2017/1371 on the fight against fraud to the Union's financial interests by means of criminal law⁶ was adopted on 5 July 2017. It enhances the protection of the financial interests of the European Union by harmonising the definitions, sanctions and limitation periods of certain criminal offences affecting those interests. Moreover, it defines the material competence of the EPPO, which will have jurisdiction over the offences established in the Directive. The deadline for transposition of the Directive into national law expired on 6 July 2019. By November 2020, 23 Member States had notified full transposition of the Directive. Three Member States had communicated only partial transposition. The Commission services have performed checks to assess whether the Directive has been transposed correctly and will continue to pursue infringement procedures where necessary in 2021.

Specific objective 3: Cooperation between OLAF and the EPPO to ensure that the EU's financial interests are better protected

Related to spending programme(s):
No

Main outputs in 2021:

Other important inputs					
Output	Indicator	Target			
Working arrangements between OLAF and the EPPO	Signature	1 st quarter 2021			
Provision of support or complementary action to the EPPO	Percentage of EPPO requests that OLAF is able to deliver	80%			
Commission decision determining the date of start of operations of the EPPO	Adoption	1st quarter 2021			

Specific objective 4: Strengthen EU framework to combat customs fraud

Regulation (EC) No 515/97 is the cornerstone of mutual assistance in customs and agricultural matters, allowing Member States' national authorities to exchange information among themselves and with the Commission to ensure the correct application of the EU legislation. The Regulation enhances administrative cooperation between customs and

⁶ Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law OJ L 198, 28.7.2017, p. 29–41

reduces the administrative burden associated with such cooperation. Since its last revision in 2015, new challenges with a potential impact on the regulation have been identified. Therefore the Commission has evaluated the regulation to check if it is still fit for purpose. In 2021, the Commission will assess whether there is a need for a revision.

At the international level, as goods imported into the EU must be subject to the applicable taxes and duties in respect of EU rules, the Commission will continue to negotiate mutual administrative assistance provisions as well as anti-fraud measures in trade agreements with its third country partners.

To support the mutual assistance activities in the anti-fraud area, the regulation establishes several IT systems (CIS – Customs Information System, FIDE – Customs File Identification database, CSM – Container Status Message directory, and IET – Import, Export, Transit directory), which are accessible to competent Member State authorities and designated Commission departments. The Commission is currently developing an automated system for the exchange of mutual assistance requests and replies (Mutual Assistance System, MAS). All these applications are available under the umbrella of the Anti-Fraud Information System (AFIS).

In the field of joint customs operations (JCOs), OLAF plays a key role in coordinating the work of several national customs authorities, exchanging information and acting together to combat fraud and smuggling of sensitive goods. Taking into account past practice, OLAF's target is to initiate two JCOs in 2021 and to do so annually in the future. However, OLAF will, in addition, provide support to the JCOs requested by the Member States and other international organisations as it has done in the past.

In 2021, OLAF and the Commission's Joint Research Centre (JRC) will continue a project (INTEL4CUSTAF) to help Member States make best use of the data at their disposal in existing databases and IT systems, and strengthen their analytical capacities in the customs antifraud area. Member States will be closely associated with this project which will include a workshop with national experts and analysts.

While OLAF is in the technical lead for some of these activities, the achievement of this objective depends also on the readiness and the capacity of the partners in the Member States, (potential) candidate countries and other non-EU countries, to cooperate to this end.

Specific objective 4: Strengther customs fraud	n EU fran	nework	to com	bat	Related to spending programme(s) No
Main outputs in 2021:					
Evaluations and fitness checks					
Output	Indicator				Target
Assess whether there is a need for a	Decision	on r	evision	of	December 2021

revision of Regulation (EC) No 515/97 on mutual administrative assistance in customs matters	Regulation (EC) No 515/97	
Other important outputs		
Output	Indicator	Target
Ensure protection of EU budget and citizens through effective anti-fraud provisions in international agreements	Number of additional third countries having negotiators' tentative agreement on bilateral customs antifraud provisions	4 by end 2021
Support customs mutual assistance through the provision of secure information exchange tools for Joint Customs Operations	Number of Joint Customs Operations organised or supported by OLAF	6 by end 2021
Support customs mutual assistance through the provision of secure information exchange tools for specific customs antifraud information exchange modules and databases (CIS, FIDE, MAS)		19 500
Support and contribute to the antifraud research capabilities of OLAF, other Commission Services and MS analysts and investigators	Progress in preparing for integration of IET with CSM in order to exploit SAD data combined with container movements for analysis: First analysis of the necessary steps for integration	By end of 2021

Specific objective 5: Strengthen EU framework to fight illicit tobacco trade

In December 2018, the Commission published a 2nd Action Plan to fight the illicit tobacco trade 2018-2022. This action plan built upon the Commission's 2013 comprehensive strategy to fight the illicit tobacco trade and its subsequent progress report of 2017. The action plan contains 50 specific policy, analytical and operational actions to be undertaken mainly by the Commission, in particular the European Anti-Fraud Office (OLAF), the Directorate-General for Health and Food Safety (SANTE), the Directorate-General for Taxation and Customs Union (TAXUD) and the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (GROW), as well as the Member States. The action plan coincided with the entry into force of the new anti-smuggling treaty known as the FCTC Protocol⁷ and the roll-out, as of May 2019, of the new EU traceability system.

Specific objective 5: Strengthen EU framework to fight illicit tobacco trade	Related to spending programme(s) No
Main outputs in 2021:	

⁷ Protocol to Eliminate Illicit Trade in Tobacco Products to the WHO Framework Convention on Tobacco Control

Other important outputs						
Output	Indicator	Target				
Implement the 2 nd Action Plan 2018- 2022 with 50 items	Progress in implementing the Action Plan : half of the action items for which OLAF is responsible completed or on- going	By end 2021				
Engaging with Eastern neighbours	Make progress in the negotiations of a Customs Cooperation and Mutual Administrative Assistance Agreement with Belarus	By end 2021				
Operation of the laboratory facility for the analysis of seized cigarettes (TOBLAB)	Tobacco samples analysed by TOBLAB, a laboratory independent from the industry: Usage of results by investigators across Member States (at least 50 TOBLAB Reports produced by JRC)	By end of 2021 (activities were disrupted in 2020 due to the coronavirus pandemic).				
FCTC Protocol	 Active contribution to the international work on implementation of the FCTC Protocol: EU proposal on establishing a 'Global Information Sharing Focal Point' sent to the relevant Working Group. Participation in at least 3 (virtual/in-person) events) 	By end of 2021				

Specific objective 6: Implementation of the Commission Anti-Fraud Strategy (CAFS) to protect the EU's financial interests

In 2019, the Commission adopted its **Commission Anti-Fraud Strategy (CAFS)**⁸, in preparation for the new Multiannual Financial Framework. The CAFS⁹ provides a policy framework for the prevention, detection, investigation and reparation of fraud at the level of the Commission and its executive agencies. It emphases anti-fraud governance in the

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⁸ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the Court of Auditors of 29 April 2019, Commission Anti-Fraud Strategy: enhanced action to protect the EU budget, COM(2019) 196.

⁹ COM(2011)376.

Commission and the collection and analysis of fraud-related data, so that OLAF will be able to assist other services to deploy scarce resources in the fight against fraud.

The Irregularity Management System (IMS) is the system through which data from Member States and (potential) candidate countries are reported. In 2021, OLAF will assist and support system users to improve data quality and to refine an analytical tool which was deployed in 2020.

Knowledge about fraud affecting the EU's financial interests will be strengthened through targeted strategic analysis bringing together the investigative experience of the Office and data and information provided by Member States and Commission services. This analysis will be defined jointly with OLAF's stakeholders on the basis of their expressed needs.

The CAFS will improve coordination and cooperation between Commission departments and Executive Agencies in the fight against fraud, and reinforce the Commission's corporate oversight of fraud issues, by giving OLAF a stronger advisory and supervisory role.

To optimise cooperation, the Commission's Fraud Prevention and Detection Network (FPDNet), a forum of anti-fraud experts from all Commission departments and Executive Agencies, was enhanced in 2019 with subgroups of DGs to facilitate targeted exchanges of views in smaller circles. In 2021, the FPDNet subgroups will continue to meet. To support and guide the services in their departmental anti-fraud strategies, OLAF will continue the systematic review of anti-fraud strategy updates put forward by Commission departments and Executive Agencies. OLAF will monitor the implementation of both the CAFS Action Plan and departmental anti-fraud strategies, thus contributing to corporate oversight of the CAFS.

Another priority for closer coordination and cooperation concerns the implementation of financial, administrative and disciplinary recommendations issued by OLAF to other services after closing an investigation in their field of work, as well as of judicial recommendations addressed by OLAF, together with its final report on an investigation, to authorities in the Member States responsible for criminal prosecution.

A dedicated task force in OLAF will, in cooperation with the Secretariat-General, the Directorate-General for Budget and other central services, regularly monitor the follow-up of its recommendations, analyse possible obstacles and devise remedial action in this respect. In 2021, it will review the outcome of OLAF's administrative recommendations. The results, in particular systemic issues, will be communicated to the Commission's Corporate

Management Board¹⁰, which assumes a strategic oversight role for the Commission's fight against fraud¹¹.

In parallel, OLAF will maintain, and bolster where appropriate, traditional fraud prevention activities, such as anti-fraud training, fraud-proofing¹² and contribute to the Commission's Early Detection and Exclusion System¹³. Through this wide range of activities, OLAF plays an important role in the fight against fraud, not only as an investigative but equally as a policy-making body.

Finally, OLAF will support the Commission services in their assessment of the Member States' Recovery and Resilience Plans, in particular the fraud proofing and control mechanisms.

OLAF is also a lead service for drafting the Commission's annual report on the Protection of the EU's financial interests, adopted under Article 325 TFEU ("PIF Report"). The report is prepared in cooperation with the Member States in the framework of the Advisory Committee for the Coordination of Fraud Prevention (COCOLAF) and offers an overview of the measures adopted and the results achieved in the fight against fraud and irregularities in the EU.

Specific objective 6: Implementati	Related to spending programme(s) No				
Main outputs in 2021:	Main outputs in 2021:				
Stakeholder communication	Stakeholder communication				
Output	Indicator	Target			
Organise COCOLAF plenary and sub- group meetings (AFCOS ¹⁴ , OAFCN ¹⁵ , Fraud prevention, Reporting and analysis of fraudulent and other irregularities)	Number of COCOLAF meetings	Five by end 2021			

¹⁰ Secretariat-General, Legal Service, Directorates-General for Human Resources and Budget. The Heads of these services are the members of the 'Corporate Management Board'.

¹⁵ OLAF Anti-Fraud Communicators' Network

¹¹ Pursuant to Commission Decision C(2018) 7706 final of 21 November 2018 on the Corporate Management Board (Article 2, paragraph 1, first subparagraph, last bullet point).

¹² Optimising the legal framework for the implementation of the budget to make it more resilient to any attempts at fraud, for instance by replying to consultations from other Commission services.

¹³ The Early Detection and Exclusion System (EDES) database is run by the Directorate-General for Budget with important input from OLAF. Results of OLAF investigations (as well as audit findings established by EU institutions and bodies) feed into action taken by Authorising Officers to exclude unreliable tenderers and grant applicants from EU funding and to flag suspicions in this respect. Such exclusion or flagging is recorded in the EDES.

¹⁴ anti-fraud coordination services

	Number of attendees	At least 60 attendees in plenary and 40 attendees in sub-group meetings
	Attendees' satisfaction rate	At least 80%
Organise FPDNet meetings	Number of FPDNet plenary meetings	Two by end of 2021
	Number of FPDNet subgroup meetings	Six by end of 2021
	Number of attendees in plenary	At least 60 attendees
	Attendees' satisfaction rate in plenary	At least 80%
Organise AFCOS seminar with Candidate and Potential Candidate Countries	A seminar has taken place	End 2021
Other important outputs		
Output	Indicator	Target
Reply to inter-service consultations through DECIDE, the Commission's all-in-one IT system to handle its decision-making processes	Percentage of consultations for which deadlines were met	90%
Actions in the CAFS Action Plan for which OLAF is in the lead that have been implemented	Percentage of actions implemented	80%
Annual Report (under Article 325(5) of TFEU) by the Commission to the EP and Council on the Protection of the EU's financial interests	Adoption of the report	3rd quarter 2021
Support Member States and Candidate and Potential Candidate Countries' users of IMS	IMS user satisfaction rate	At least 70%
Fraud awareness trainings for internal and external stakeholders	Participant satisfaction rate	75%
Review of OLAF's financial monito- ring guidelines in consultation with the Directorate-General for Budget and the Commission's FPDNet	Revised guidelines adopted	Second semester of 2021

Specific objective 7: Support to national authorities and other partners in the protection of the European Union's financial interests through the EU Anti-Fraud Programme

The Hercule III Programme, intended "to prevent and combat fraud, corruption and any other illegal activities affecting the financial interests of the Union" came to its final year of implementation in 2020.

The final evaluation of Hercule III (required by the programme's Regulation (EU) No 250/2014) was launched in 2020 for completion by the end of 2021.

As part of the next Multiannual Financial Framework 2021-2027 (MFF), the Commission adopted a proposal for a regulation establishing the EU Anti-Fraud Programme. The general objectives of the proposed Programme are (1) to support the protection of the EU's financial interests and (2) to support mutual administrative assistance, including operational activities, between Member States' customs authorities and cooperation with the Commission.

The proposed programme is a combination of two different types of activities: the first one is a classic spending programme following up on the Hercule III programme, which came to an end on 31 December 2020, while the second one constitutes the financing basis for operational activities which are tasked to the Commission by secondary legislation. In the latter category, the proposed Programme would comprise the Anti-Fraud Information System (AFIS), on mutual administrative assistance between customs authorities and cooperation with the Commission, as well as the Irregularity Management System (IMS), the information system established for the reporting by Member States and (potential) candidate countries of irregularities to the EU budget in shared management and pre-accession funds. AFIS is being evaluated as part of the on-going evaluation of Regulation (EC) No 515/97 on mutual administrative assistance in customs and agriculture matters, as this is the legal base for AFIS and, until the proposed EU Anti-Fraud Programme is adopted, for its financing.

OLAF is the lead Commission service in the negotiations on the AFP. Political agreement on the new regulation establishing the EU Anti-Fraud Programme was reached between the EU Council, EP and Commission on 8 December. Following the endorsement of the political agreement by the Council and the Parliament, the regulation is likely to be formally adopted in the first quarter 2021.

Programme implementation will start in 2021. The time-line for the conclusion of negotiations and adoption and entry into force of the programme will determine whether a full annual cycle can be completed, especially as regards grants.

Specific objective 7: Support to national authorities and other partners in the protection of the Union's financial interests through the EU Anti-Fraud Programme¹⁶

Related to spending programme(s): EU Anti-Fraud Programme

Main outputs in 2021:

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New	nolicy	y initia	TIVAC
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Output					Indicator	Target
Regulation	on	an	EU	Anti-Fraud	Entry into force	1 st quarter 2021

¹⁶ For the result indicator related to the AFIS part of the programme, namely on the "Number of mutual assistance information made available and number of supported mutual-assistance related activities", see indicator 4.4 above mentioned.

Programme (MFF 2021-2027)		
Evaluations and fitness checks		
Output	Indicator	Target
Evaluation of Hercule III	Commission evaluation report	31/12/2021
Other important outputs		
Output	Indicator	Target
Annual overview of the results of the	Commission Staff Working	3 rd quarter 2021
Hercule III Programme in 2020	Document accompanying the PIF report 2020	
High stakeholder satisfaction with the Programme		80%

PART 2. Modernising the administration: main outputs for the year

In 2021, the Office will further modernise its ways of working, and notably in areas such as human resources, fraud risk management, and digital transformation and information management. In particular, as a response to COVID-19, an active support to OLAF staff and managers will continue through various tools, also with a purpose to maintain the Office fully operational. In the same vein, OLAF Case Management System (OCM) will be fully developed and the Office will pursue other IT projects for a better access to data from different sources, of which the Directorate-General for Informatics (DIGIT) is fully aware.

The internal control framework¹⁸ supports sound management and decision-making. It notably ensures that risks to the achievement of objectives are taken into account and reduced to acceptable levels through cost-effective controls.

OLAF has established an internal control system tailored to its particular characteristics and circumstances with special attention for safeguarding the sensitive information it handles. The effective functioning of the service's internal control system will be assessed on an ongoing basis throughout the year and be subject to a specific annual assessment covering all internal control principles.

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¹⁷ In the Strategic Plan, the interim milestone (2022) is 80% and the final milestone 85% (2024). Given the risk of a delayed adoption of the Anti-Fraud Programme Regulation, the number of activities financed in 2021 might be limited. In such circumstances, it is appropriate to aim at a lower target for the initial year of programme implementation.

¹⁸ Communication C(2017)2373 - Revision of the Internal Control Framework

A. Human resource management

OLAF continuously streamlines its working methods, optimises allocation of its workforce and improves its efficiency by clearly establishing measurable targets and demonstrating results.

In 2021 OLAF will continue to monitor the use of the workforce to ensure adequate staffing across the Office. This is essential in view of the agreed transfer of 6 establishment posts and of the credits for 4 external posts to EPPO only on 1 January 2022.

In order to manage the transition following OLAF reorganisation in 2020, OLAF will continue to provide specialised training to colleagues who are changing tasks and will provide support to them to help them cope with change effectively while maintaining their well-being. As a response to COVID-19 challenges, new virtual Programmes will be launched inhouse to reinforce the expertise of OLAF colleagues. In the same vein, virtual trainings specifically targeted for newly recruited staff have been designed. Moreover, recognising the difficulties in the setting up and strengthening of new teams in the COVID-19 conditions, OLAF will continue to support the establishment of dynamic new units with virtual workshops and virtual team-building events. The impact of the new organisation on staff satisfaction and well-being will be measured with an internal survey to be launched in early 2021.

Throughout the COVID-19 crisis and its aftermath, active support has been provided to OLAF staff and managers through guidance on learning and professional development, internal communication actions, virtual participatory events and flexible solutions to *ad hoc* needs. Raising awareness activities on career development and career guidance will be pursued in 2021.

A new HR strategy will be developed following the HR Corporate Strategy focusing on the six pillars identified by the Directorate-General for Human Resources and Security (talent, diversity and inclusion, leadership and management, workplace and well-being, technology, culture and organisation). The 2019 HR Strategic Plan will be reviewed and updated in Q2 2021 followed by an HR Action Plan with a monitoring framework for its implementation.

To facilitate the adoption of a flexibility tool for investigators, OLAF will identify the skills required for each task, prepare an inventory of skills and competencies already available in OLAF and plan possible trainings. A skills gap analysis will be based on the first experiences that OLAF will have gained in cooperating with the EPPO while taking into account other changes in OLAF's operating environment, such as OLAF's investigative activities in emerging areas of fraud and additional tasks in the implementation of the Commission Anti-Fraud Strategy.

OLAF will pay particular attention to diversity and inclusion and will endorse all talent development programmes for aspiring female middle and senior managers launched by Corporate HR.

Objective: OLAF employs a competent and engaged workforce and contributes to gender equality at all levels of management to effectively deliver on the Commission's priorities and core business

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Output	Indicator	Target
Continue to encourage female candidates by targeted information diffusion, by stimulating participation in specific trainings and by endorsing the Commission Female Talent Development Programme	Percentage of female representation in the middle management	At least maintaining the level of 2020 (42%)
Continue to encourage female candidates by targeted information diffusion, by stimulating participation to specific training and by endorsing the Commission Female Talent Development Programme	Number of first female appointments to middle management positions	1 first female appointment to MM between 2020 and the end of 2022.
Reviewing and further updating the specific actions included in the OLAF Development Plan in the context of the OLAF reorganisation	OLAF staff engagement index in the next staff survey	At least equal to the Commission's average
Launch an internal staff survey to measure the impact of the new organisation on staff satisfaction and well-being	Staff survey	Q1
Review and update the HR Strategy	HR Strategy	Q2

B. Sound financial management

In relation to the control effectiveness as regards legality and regularity, OLAF has set up the internal control processes with the purpose of ensuring adequate management of the risks relating to underlying transactions. The control objective is to ensure that the cumulative budgetary impact of any residual error rate does not exceed 2%. The capacity to detect and correct the errors having a financial impact is also a key element in the control strategy that is carefully monitored in OLAF. The indicators regarding the estimated overall amount at risk for the year for the entire budget under the DGs responsibility and the estimated future corrections are not key management indicators for OLAF but rather corporate ones. Therefore, OLAF is maintaining corporate targets for these indicators.

The atypical position of OLAF as the Office in charge of the fight against fraud pleads for a strong control environment. As the corresponding costs of control have been assessed as adequate over the past years, the same level is to be maintained for 2021.

Objective: The authorising officer by delegation has reasonable assurance that resources have been used in accordance with the principles of sound financial management and that cost-effective controls are in place which give the necessary guarantees concerning the legality and regularity of underlying transactions

Main outputs in 2021:

Output	Indicator	Target
Effective controls: Legal and regular transactions	Risk at payment	Remains < 2 % of relevant expenditure
	Estimated risk at closure	Remains < 2 % of relevant expenditure
Efficient controls	Time-to-pay	Remains > 90 % of payments executed within legal time limits
Economical controls	Overall estimated cost of controls	Remains < 4 % of funds managed

C. Fraud risk management

Due to the reorganisation of OLAF in June 2020, the review of OLAF anti-fraud strategy (AFS) for 2021-2024 had to be slightly postponed and will occur in spring 2021. The review will be done on the basis of the methodology provided by OLAF at corporate level.

The review will take into account a fraud risk screening conducted internally and the audit assignment carried out by the Commission's Internal Audit Service on ethics in the second half of 2017. It will also take into account the two strategic objectives identified in the last update in 2018:

- Promote the highest standards of professional ethics
- · Maintain a high level of control for funds managed by OLAF

An action plan, designed to put into effect OLAF's anti-fraud strategy, covering the period 2021 to 2024, will be implemented throughout this period.

Objective: The risk of fraud is minimised through the application of effective anti-fraud measures and the implementation of the Commission Anti-Fraud Strategy (CAFS)¹⁹ aimed at the prevention, detection and correction²⁰ of fraud

Main outputs in 2021:

OutputIndicatorTargetImplementation of the action planImplemented actions80%

 19 Communication from the Commission "Commission Anti-Fraud Strategy: enhanced action to protect the EU budget', COM(2019) 176 of 29 April 2019 – 'the CAFS Communication' – and the accompanying action plan, SWD(2019) 170 – 'the CAFS Action Plan'.

²⁰ Correction of fraud is an umbrella term, which notably refers to the recovery of amounts unduly spent and to administrative sanctions.

D. Digital transformation and information management

In 2021, the **OLAF Case Management System (OCM)** project will continue the development of the remaining features, i.e. reporting for investigative units, improvements to e-Domec compliance, enabling access to the members of the Supervisory Committee and monitoring of disciplinary and administrative recommendations. The new Regulation (EU, Euratom) 2020/2223 entering into force on 17 January 2021 will also be implemented in the course of the year. The project will finish in 2021 and will then enter in - reduced cost - maintenance mode. In parallel, OLAF will continue working with EPPO as well as other European anti-fraud, judicial and law enforcement services on the design and implementation of a hit/no-hit interface.

Even in maintenance mode, updates will continue. As regards financial recommendations in particular, OLAF has extended its monitoring approach to cover the entire process, not only from the OLAF recommendation to the establishment of an amount to be recovered but also from the established amount to actual recovery. In 2021, the financial monitoring module in the OCM will be adapted to that more comprehensive approach.

Over the medium term OLAF will, in cooperation with the Directorate-General for Budget and other Commission services, set up innovative, performing and secure IT solutions for an efficient real-time exchange of information among services on the follow-up given to OLAF's financial and administrative recommendations.

The **AFIS** (Antifraud Information System) will extend the interoperability of the platform in 2021. In addition to the web service with the World Customs Organization for the Customs Information System (CIS+), which went live in 2020, it will develop further web services that will allow connection of relevant systems of partner administrations and exchange of additional case types. This will facilitate the automated exchange of relevant cases and would contribute to the once-only principle by avoiding that a situation in which the same information has to be entered multiple times in different systems by Member States' authorities. AFIS' security will be strengthened in 2021 by reviewing the security policy and implementing additional security measures that have been identified in the review and update of the security plan.

The resources owned by OLAF are: CMS, OCM and AFIS with all its applications. The rest of the resources listed in the EC Data Inventory are 3rd party owned.

All these systems are operational in nature (contain sensitive and personal data) and follow their own project management documentation (including Security Plans and Data Protection Records).

From a data management perspective, both OCM and AFIS contain information that needs corroboration in order to generate intelligence in support of the OLAF investigative capacities.

In 2021 OLAF will further pursue its GETI (get Intelligence) project that aims at allowing fast and easy access to combined datasets collected from different sources (OCM, IMS, EC databases and open sources). Therefore, the main objectives for the Intelligence and Operational Analysis Unit in OLAF will be to enhance the principles of the EC Data Strategy with regards to corporate principles for the creation, collection or acquisition of data assets:

- Cooperation with the EC Services and Agencies for sharing "corporate tools, platforms and services for creating, managing and visualising data"
- Reusability of data for the purpose of supporting antifraud investigations

The objectives in relation to data interoperability and standards are the identification of the data assets that are useful for OLAF investigative tasks and in the process ensure a cooperation with the data owner to improve the access and provide feed-back.

Data protection forms an integral part of the OLAF's business processes whenever these require the processing of personal data. A prerequisite for compliance with data protection is staff awareness of data protection rules applicable to particular areas of their work (e.g. investigative activities at OLAF, anti-fraud policy areas, rules regulating document management or security of information in the Commission). By 2024, as part of a continuous effort, OLAF aims at delivering a dedicated data protection training for all investigative staff and awareness raising activities in this domain for all other staff. For 2021 the cumulative target is 70 % and 90 % of (not yet trained) staff respectively.

Objective: OLAF is using innovative, trusted digital solutions for better policy-shaping, information management and administrative processes to forge a truly digitally transformed, user-focused and data-driven Commission

Main outputs in 2021:					
Output	Indicator	Target			
Implementation of the amended Regulation (EU, EURATOM) No 883/2013 in OCM	OLAF has in place a Case Management System compatible with its regulatory framework	The amended Regulation (EU, EURATOM) No 883/2013 is well implemented in OCM by Q3/2021			
Improved interoperability of AFIS with partner administrations' systems	Anti-fraud cases and cash declarations in CIS+ are automatically exchanged with more than one partner administration	Web service for CIS+ extended to additional case types implemented and operational with more than partner administration by the end of 2021			
Analyse the closed data assets reported in the EC Data Inventory in order to identify OLAF relevant data sources for OLAF anti-fraud	Access obtained	85%			

activities and obtain access to these specific sources		
Explore the existing publicly available data relevant to OLAF in order to corroborate with operational information	Interoperability New resources added	>5 resources added
Implement state-of-the-art software and make use of open sources software to analyse the data	Corporate tools New tools added	>1 tool/technique added
All OLAF staff to attend awareness raising activities or targeted data protection training	Attendance registered via EU Learn	70%
OLAF investigative staff to attend trainings on data protection	Attendance registered via EU learn	90%

E. Sound environmental management

OLAF has set up in 2018 a Green Team, an open cross-directorate group, aiming at supporting its two Eco-Management and Audit Scheme (EMAS) correspondents and proposing local actions beside the EMAS framework. The activities of the Green Team are coordinated with the EMAS team and hierarchy accordingly.

In 2021, OLAF will continue its active support to EMAS corporate campaigns at local level and launch actions for its own administration and activities, fitting its needs or specificities. OLAF's priority is to give a more visible structure to the EMAS-related actions through a regular reporting to Senior Management to ensure their support and participation. OLAF's actions will consist of inter alia monitoring resource (electricity, gas and water) and paper consumption, combining this with awareness raising campaigns to link the impact of personal behaviours with a reduction of resource consumption. OLAF will also focus on the reduction of CO2 emissions thanks to online events replacing missions and external meetings. It will also raise awareness of staff on waste reduction and waste management through the use of recycling bins. For its actions, OLAF intends to organise meetings and debates, draft articles in OLAF's newsletter, or ad hoc activities concerning greener approach both in the private and professional spheres.

Objective: OLAF takes full account of its environmental impact in all its actions and actively promotes measures to reduce the related day-to-day impact of the administration and its work

Main results and outputs in 2021:					
Output		Indicator	Target		
Monitor the consumersources: electricity and	mption of I gas	Number of KwH of electricity and gas per person	Reduction of 5%: 7268,74 KwH (baseline 2018: 8054 KwH)		

Monitor the consumption of resources: water	Number of cubic meter water per person.	Reduction of 3%: 7,52 m ³ (baseline 2018: 8m ³)
Promote staff awareness about eco-tips in OLAF's newsletters	Articles with eco-tips in OLAF's newsletters	≥3
Raise staff awareness through events and actions organised by the EMAS correspondents or the OLAF Green Team	Number of conferences, meetings and campaigns	2

F. Example(s) of initiatives to improve economy and efficiency of financial and non-financial activities

OLAF's new structure will allow for improved flexibility and for adequate prioritising of all activities, by combining some tasks and creating synergies. The centralisation of the procurement related tasks in the Office's budget and finance unit should entail a more robust control structure and is also expected to further reduce the time-to-pay.

According to the first indications of the running calls organised entirely online, the overall time for concluding the tender procedures has shortened drastically and the involvement of the operational colleagues is needed less. This should continue to be the case in 2021. Moreover, together with the introduction of the eProcurement tool PPMT, the procurement process in OLAF has become fully automated. This is another element that will most probably be reflected in additional saving of resources.

In 2021 OLAF will further pursue its GETI project mentioned under Point D. This will enhance the effectiveness of data searches by OLAF staff as the data will be available on one platform rather than scattered across different sources.

OLAF has centralised IT, previously spread in four different units, to one single unit. This has resulted already in better backing up of staff being absent and sharing of best practises in relation to IT project management. Next step will be to develop an enterprise approach in IT development and operations and elaborate on a common approach for the management of the data OLAF's information systems contain thus, improving the investigative and reporting capabilities of the Office.