EUROPEAN
COMMISSION

Brussels, 12.11.2026
C(2026) 7939 final

COMMUNICATION TO THE COMMISSION

ON THE PUBLICATION OF INFORMATION ON OCCUPATIONAL ACTIVITIES OF SENIOR COMMISSION OFFICIALS AFTER LEAVING THE SERVICE (ARTICLE 16, FOURTH PARAGRAPH, OF THE STAFF REGULATIONS)

2026 Annual report

COMMUNICATION TO THE COMMISSION

ON THE PUBLICATION OF INFORMATION ON OCCUPATIONAL ACTIVITIES OF SENIOR COMMISSION OFFICIALS AFTER LEAVING THE SERVICE (ARTICLE 16, FOURTH PARAGRAPH, OF THE STAFF REGULATIONS)

2026 Annual report

In line with Article 16 of the Staff Regulations[1], after leaving the service, officials continue to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits. Former officials who intend to take up an occupational activity within two years of leaving the service must inform their former EU institution so that it can take an appropriate decision. If that activity is related to the work carried out by the official during their last three years of service and could lead to a conflict with the legitimate interests of the institution, the institution concerned can either prohibit the activity or give its approval subject to appropriate restrictions where relevant.

The third paragraph of Article 16 of the Staff Regulations states that the Appointing Authority must, in principle, prohibit former senior officials, for the first 12 months after leaving the service, from engaging in lobbying or advocacy directed at staff of their former institution for their business, clients or employers, on matters for which they were responsible during their last three years of service.

While complying with data-protection rules[2], the fourth paragraph of Article 16 of the Staff Regulations requires each institution to publish information annually on the implementation of the third paragraph, including a list of the cases assessed.

To meet this requirement, Section 1 of the annual report sets out the criteria that the Commission has used to ensure the correct implementation of Article 16, paragraph 3, and Section 2 sets out an analysis of the occupational activities declared by former senior officials of the Commission in 2025. The annex to the report summarises the Commission decisions taken under Article 16 regarding its former senior officials.

This is the 12th annual report published by the Commission, in line with its obligations under the fourth paragraph of Article 16 of the Staff Regulations.

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1 As last amended by Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013 (OJ L 287, 29.10.2013, p. 15).

2 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.

1. Criteria applied to implement the third paragraph of Article 16 of the Staff Regulations

1.1. Definition of senior officials

In line with the third paragraph of Article 16 of the Staff Regulations, the following categories of Commission staff are concerned:

- directors-general or deputy directors-general (including officials that were called upon to occupy temporarily such posts in line with Article 7(2) of the Staff Regulations) and 'hors classe' advisers who exercised these functions at any time during the last three years before they left the service;
- directors (including officials that were called upon to occupy temporarily such a post in line with Article 7(2) of the Staff Regulations) and principal advisers who exercised these functions at any time during the last three years before they left the service;
- heads of cabinet who exercised this function at any time during the last three years before they left the service.

1.2. Definition of lobbying and advocacy

Activities giving rise to lobbying or advocacy are defined in: (i) the transparency register set up under the Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission of 20 May 2021[3] (see its Article 3 'Activities covered' and its Article 4 'Activities not covered'); and (ii) the Commission Decision on transparency measures concerning meetings held between Commission staff holding management functions and interest representatives[4] (see its Article 2).

For the purposes of assessing occupational activities after leaving the service, lobbying and advocacy activities directed at the Commission include all activities carried out to influence the formulation or implementation of policy or legislation, or the Commission's decision-making processes.

The third paragraph of Article 16 of the Staff Regulations refers to former senior officials' activities that constitute lobbying or advocacy directed at staff of their former institution for their business, clients, or employers on matters for which they were responsible during their last three years of service. Such activities must, in principle, be prohibited by the Appointing Authority during the first 12 months after the former senior official leaves the service.

The Commission does not limit its analysis to the declared activities the sole or core purpose of which would be lobbying or advocacy. The analysis also includes activities that could, because of their nature, give rise to – or entail – lobbying or advocacy, even if lobbying or advocacy were excluded in the declaration made by the former staff member. This broader assessment helps the Commission to limit potential risks.

[3] Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register.

[4] Commission Decision (EU) 2024/3082 of 4 December 2024 on transparency measures concerning meetings held between Commission staff holding management functions and interest representatives, and repealing Decision 2014/838/EU, Euratom.

In line with the rules in force, the analysis does not cover declarations received for activities that could not, by their very nature, give rise to – or entail – lobbying or advocacy, for instance, academic activities or employment in a national public administration.

1.3. Temporal scope

The third paragraph of Article 16 of the Staff Regulations applies, in principle, for the first 12 months after senior officials leave the service of the Commission.

1.4. The decision-making procedure for Article 16 of the Staff Regulations for former senior officials

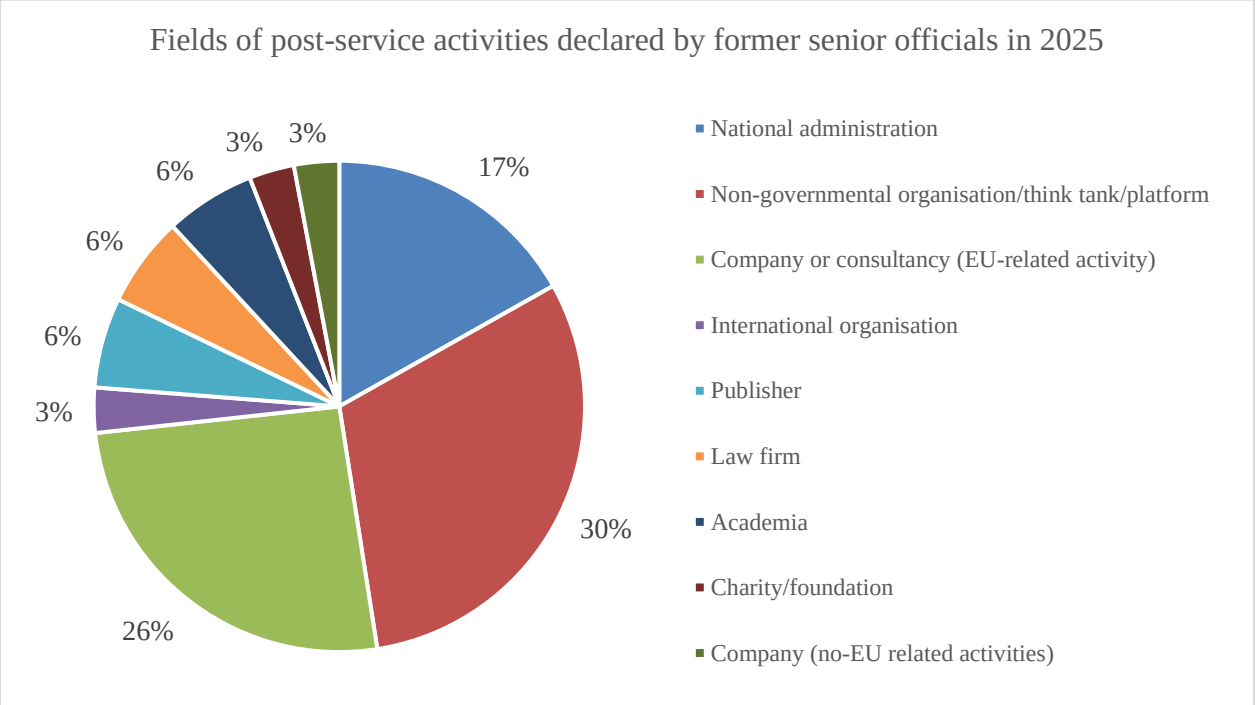
The Commission's Directorate-General for Human Resources and Security (DG HR) receives the declaration from former Commission staff members. DG HR then collects views of the department(s) in which the former senior officials worked during their last three years of service, the respective cabinet(s), the Secretariat-General, the Legal Service and the Joint Committee. The Appointing Authority then takes its final decision based on these views.

2. Analysis

2.1. Occupational activities declared by former senior officials in 2025

In 2025, 22 former Commission senior officials declared 35 post-service activities in accordance with Article 16 of the Staff Regulations.

For the purposes of reporting and statistical analysis over time, the 35 declared post-service activities have been categorised within 9 distinct fields, as illustrated in the pie chart below.



2.2. Occupational activities falling within the scope of this report

Of the 35 post-service activities declared by former senior officials in 2025, 8 fell outside the relevant 12-month period.

Of the remaining 27 activities, 11 were considered to potentially give rise to lobbying or advocacy directed at staff of the former senior officials' institution on matters for which they were responsible during their last three years of service.

The Appointing Authority authorised these 11 post-service activities on condition that, for at least 12 months after leaving the service, the former senior officials concerned would not engage in lobbying or advocacy directed at Commission staff on matters for which they had been responsible during their last three years of service. The Appointing Authority considered it plausible and feasible to exercise the activities in a meaningful manner and in full respect of this condition. Additionally, the Appointing Authority imposed other restrictions and conditions on those activities with due respect to the right to work of the individuals concerned and the principle of proportionality.

On this basis, this report includes a summary of the 11 decisions taken by the Appointing Authority relating to the corresponding 11 activities that were declared by former senior officials and actually undertaken during their first 12 months after leaving the service.

2.3. Occupational activities falling outside the scope of this report

The Appointing Authority imposed proportionate restrictions, where appropriate, for 6 activities that fell outside the relevant 12-month period. These included limitations on lobbying, on professional contacts with former colleagues or on handling certain cases or files, and requirements to uphold the duties of discretion and confidentiality.

However, none of these activities are covered in this report, which is limited to the reporting obligation set out in the fourth paragraph of Article 16 of the Staff Regulations.

3. Conclusion

The annex to this report summarises the 11 decisions taken under the third paragraph of Article 16 of the Staff Regulations on the corresponding 11 post-service activities that were going to be performed by former senior officials within 12 months of leaving the service and that were actually undertaken.

In those decisions, the Appointing Authority considered that, even if lobbying or advocacy were excluded at the time the former senior Commission officials submitted their declarations, the nature of those activities meant they could involve lobbying or advocacy, as stated in the third paragraph of Article 16 of the Staff Regulations. Those activities were therefore authorised on condition that they would not entail lobbying or advocacy, and were subject to other relevant restrictions.

All former senior officials were equally reminded of other applicable post-service obligations under the Staff Regulations, such as: (i) the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits (Article 16, first paragraph, of the Staff Regulations); (ii) the duty of confidentiality (Article 17 of the Staff Regulations); and (iii) the obligation to notify any new occupational activities within two years of leaving the service (Article 16, second paragraph, of the Staff Regulations).

ANNEX - Summary of relevant decisions by the Appointing Authority in 2025:

1.

CONCERNS

Mr Daniel BRAUN

Former Head of Cabinet of Vice-President for Values and Transparency

End of service: 28 February 2025

NEW ACTIVITY

Chief Executive Officer of GLOBSEC, Bratislava, Slovakia.

Drive the organisation's initiatives, manage its internal operations and lead the development of its policy agenda.

DECISION

The Appointing Authority authorised Mr Braun to carry out this activity with the following conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No advising GLOBSEC's staff in charge of EU relations on lobbying and advocacy strategies and activities towards the Commission on matters for which he had been responsible during the last 3 years of service.
- No advising on, or contributing to, the preparation or submission of any funding proposals, including tender submissions in public procurement procedures, to the Commission on behalf of GLOBSEC.

In addition, Mr Braun was required to:

- Ensure that public communications on this new position include explicit information that his activity is subject to ethical obligations as former staff member of the Commission, during the first 6 months upon starting the new role.
- Make restrictions and obligations transparent to GLOBSEC.
- Clarify that he does not represent the position or interests of the Commission.

2.

CONCERNS

Mr Wolfgang BURTSCHER

Former Director-General of the Directorate-General for Agriculture (DG AGRI)

End of Service: 30 April 2025

NEW ACTIVITY

Structural adviser at EUTOP Europe GmbH in Munich, Germany.

Offer strategic advice on navigating EU legislative processes and support clients in understanding regulations and policy developments.

DECISION

The Appointing Authority approved Mr. Burtscher's activity with the following conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No professional contacts with staff of DG AGRI, staff of their responsible Cabinet, or their Commissioner, as well as other services and Cabinets involved in files which had fallen under his responsibility during his last 3 years of service, including DG SANTE, DG RTD, DG TRADE, DG CLIMA, DG ENV and their corresponding Cabinets.
- No advising on, or contributing to, the preparation or submission of any funding proposals, including contracts and submissions to public procurement procedures, to the Commission on behalf of EUTOP or its clients, concerning matters on which he had worked, on for which he had been responsible, during his last 3 years of service.
- No advising EUTOP or its clients on any file or programme on which he had directly worked, or which had fallen under his responsibility, during his last 3 years of service.
- No accepting as clients any of the major stakeholders, which had been significantly or prominently involved in, or affected by, files on which he had directly worked, or which had directly fallen under his responsibility, during his last 3 years of service, and which could cast doubt on his independent and impartial performance of duties while in the service.

In addition, Mr Burtscher was required to:

- Ensure that public communications on this new position include explicit information that his activity is subject to restrictions and conditions imposed by the Commission.
- Make restrictions and obligations transparent to EUTOP and, where relevant, to its clients.

3.

CONCERNS

Mr Paul CSISZÁR

Former Director of Directorate E 'Markets and Cases IV: Basic industries, Manufacturing and Agriculture' in the Directorate-General for Competition (DG COMP)

End of Service: 30 April 2024

NEW ACTIVITY

Part-time non-employee legal counsel for Citadel LLC, Miami, United States of America.

Provide services of legal review, analysis of potential effects and advice on the legal and regulatory effects of publicly available regulatory initiatives.

DECISION

The Appointing Authority approved Mr. Csiszár's activities with the following conditions:

For 1 year after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service

For 2 years after leaving the service:

- No professional contacts with staff of DG COMP and other Commission services involved in competition cases or policy files which had fallen under his responsibility during his last 3 years of service.
- No accepting as clients any of the companies which, as major stakeholders in the markets of Basic Industries, Manufacturing and Agriculture, had actively participated in any high-profile competition cases, which had been decided or on which he had taken a position when he had been responsible for these instruments in his last 3 years of service.

Without time limit, no work (directly or indirectly) on any cases or policy files that had fallen under his responsibility, or in which he had been involved, during the entire duration of his work in DG COMP.

In addition, Mr Csiszár was required to:

- Avoid any situation that might create a risk of real, potential or perceived conflict of interests.
- Ensure that public communications on this new position include explicit information that his activity is subject to restrictions and conditions imposed by the Commission.
- Make restrictions and obligations transparent to Citadel and, where relevant, to its clients.

4.

CONCERNS

Mr Marcel HAAG

Former Director for Directorate B ‘Horizontal Policies’ in the Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA)

End of Service: 28 February 2025

NEW ACTIVITY

Self-employed attorney-at-law in Germany and Belgium.

Providing legal advice and legal representation including in areas related to EU law.

DECISION

The Appointing Authority approved Mr Haag's post-service activity under the following conditions.

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No professional contacts towards staff of DG FISMA, staff of their responsible Cabinet or their Commissioner, as well as other Commission services and Cabinets that had been involved in files which had fallen under his responsibility during his last 3 years of service, including the Legal Service, Secretariat-General, DG ENV, DG CLIMA, DG ECFIN and DG CNECT, and their corresponding Cabinets.
- No advising on, or contributing to, the preparation or submission of any funding proposals, including contracts and submissions to public procurement procedures, to the Commission on behalf of his clients, concerning matters on which he had worked, on for which he had been responsible, during his last 3 years of service. In particular, no having any contractual relations with the beneficiaries of grants, the allocation of which he had been involved in.
- No working on, providing consultancy or legal services to, representing or advising clients, on any file or programme on which he had directly working, or which had fallen under his responsibility during his last 3 years of service.
- No accepting as client any of the major stakeholders which had been significantly or prominently involved in, or affect by, files on which he had worked directly, or which had directly fallen under his responsibility, during his last 3 years of service, and which could cast a reasonable doubt on his independent and impartial performance of duties while in the service.

Without any time limit, Mr Haag cannot deal with any open cases (or possibly new cases linked to closed ones) on which he directly worked during his service.

Additionally, Mr Haag was required to:

- Ensure that public communications on this new position include explicit information that his activity is subject to restrictions and conditions imposed by the Commission.
- Make restrictions and obligations transparent to its clients.
- Report every 6 months on the compliance with the restriction relating to clients, by informing the Commission.

5.

CONCERNS

Mr Andrzej RYS

Former Director for Directorate D 'Health Systems, medical products and innovation' in the Directorate-General for Health and Food Safety (DG SANTE)

End of Service: 30 April 2025

NEW ACTIVITY

Member of the Expert Advisory Committee of the European Health Forum Gastein, Bad Hofgastein, Austria.

Helping steer the organisation's annual work programme, providing advice on its annual conference, advising on its future developments and engagements.

DECISION

The Appointing Authority approved Mr. Rys' activity with the following conditions:

For 1 year after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No advising the organisation on its lobbying and advocacy strategy and activities towards the Commission, in relations to matters for which he had been responsible during the last 3 years of service.
- No advising on, or contributing to, the preparation or submission of any funding proposals to the Commission on behalf of the organisation, concerning matters on which he had worked, on for which he had been responsible.

6.

CONCERNS

Mr Andrzej RYS

Former Director for Directorate D 'Health Systems, medical products and innovation' in the Directorate-General for Health and Food Safety (DG SANTE)

End of Service: 30 April 2025

NEW ACTIVITY

Member of the Board of Directors of Friend of the Global Fund Europe, Paris, France.

Participating in the administration of the association, providing advice to promote global health and the works of the Global Fund.

DECISION

The Appointing Authority approved Mr. Rys' activity with the following conditions:

For 1 year after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No advising the Friends of the Global Fund Europe, or the Global Fund, on their lobbying and advocacy strategy and activities towards the Commission, in relation to matters for which he had been responsible during the last 3 years of service.
- No advising or, or contributing to, the preparation or submission of any fundraising call upon the Commission to pledge contribution to the Global Fund's replenishment.

Additionally, Mr Rys was required to ensure that public communications on this new position include explicit information that his activity is subject to ethical obligations as former staff member of the Commission, during the first 6 months upon starting the new role.

7.

CONCERNS

Mr Diederik SAMSOM

Former Head of Cabinet of Executive Vice-President in charge of the European Green Deal and of Commissioner for Climate Action

End of Service: 7 June 2024

NEW ACTIVITY

Member of the Advisory Board of CarbonX, Delft, the Netherlands.

Providing the company with financial, strategy and technical advice.

DECISION

The Appointing Authority approved Mr Samsom's post-service activity under the following conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No advising CarbonX on its lobbying and advocacy strategy and activities towards the Commission, in relation to matters for which he had been responsible during the last 3 years of service.
- No professional contacts towards staff of the Cabinets of Commissioner for Climate, Net Zero and Clean Growth, Commissioner for Energy and Housing, Commissioner for Environment, Water Resilience and a Competitive Circular Economy, and Executive Vice-President for Clean, Just and Competitive Transition, as well as the staff of DG ENER, CLIMA, ENV and IDEA. This also applied to other Commission services and their respective Cabinets that had been involved in policy files which had fallen his responsibility during his last 3 years of service.
- No advising on, or contributing to, the preparation or submission of any funding proposals, including tender submissions in the context of public procurement procedures, to the Commission on behalf of the company.

Additionally, Mr Samsom was required to:

- Ensure that public communications on this new position include explicit information that his activity is subject to restrictions and conditions imposed by the Commission.
- Make restrictions and obligations transparent to CarbonX.

8.

CONCERNS

Mr Diederik SAMSOM

Former Head of Cabinet of Executive Vice-President in charge of the European Green Deal and of Commissioner for Climate Action

End of Service: 7 June 2024

NEW ACTIVITY

Adviser to the board and management of Publieke Zaken, Amsterdam, the Netherlands.

Advise the company's board and management on strategy.

DECISION

The Appointing Authority approved Mr Samsom's post-service activity under the following conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No advising Publieke Zaken's board and management on lobbying and advocacy strategies and activities towards the Commission, in relation to matters for which he had been responsible during the last 3 years of service.
- No professional contacts towards staff of the Cabinets of Commissioner for Climate, Net Zero and Clean Growth, Commissioner for Energy and Housing, Commissioner for Environment, Water Resilience and a Competitive Circular Economy, and Executive Vice-President for Clean, Just and Competitive Transition, as well as the staff of DG ENER, CLIMA, ENV and IDEA. This also applied to other Commission services and their respective Cabinets that had been involved in policy files which had fallen his responsibility during his last 3 years of service.

Additionally, Mr Samsom was required to:

- Ensure that public communications on this new position include explicit information that his activity is subject to restrictions and conditions imposed by his former institution, in accordance with the obligations of former staff members of the Commission.
- Make restrictions and obligations transparent to Publieke Zaken.

9.

CONCERNS

Ms Catharina SIKOW-MAGNY

Former Director for Directorate C 'Green Transition and Energy System Integration' in the Directorate-General for Energy (DG ENER)

End of Service: 31 August 2024

NEW ACTIVITY

Part-time adviser at Foereningen Taenketanken CONCITO, Copenhagen, Denmark.

Providing expert advice on CONCITO's scientific analysis aiming at decarbonising the economy by 2050, with a main focus on socio-economic and cost-benefit analysis.

DECISION

The Appointing Authority authorised Ms Sikow-Magny's activity under the following conditions:

For 1 year after leaving the service:

- No lobbying and advocacy on matters for which she had been responsible during the last 3 years of service.

For 2 years after leaving the service:

- No professional contacts towards staff of DG ENER and its associated Cabinet, as well as other Commission services which had been involved in policy files that had fallen under her responsibility during her past 3 years of service.
- No advising on, or contributing to, the preparation of submission of any funding proposals to the Commission.

Additionally, Ms Sikow-Magny was required to:

- Ensure that public communications on this new position include explicit information that her activity is subject to restrictions and conditions imposed by the Commission.
- Make restrictions and obligations transparent to CONCITO.

10.

CONCERNS

Ms Catharina SIKOW-MAGNY

Former Director for Directorate C 'Green Transition and Energy System Integration' in the Directorate-General for Energy (DG ENER)

End of Service: 31 August 2024

NEW ACTIVITY

Adviser at Renewables Grid Initiative e.V., Berlin, Germany.

Providing strategic advice to the organisation on its future activities and focus.

DECISION

The Appointing Authority authorised Ms Sikow-Magny's activity under the following conditions:

For 1 year after leaving the service:

- No lobbying and advocacy on matters for which she had been responsible during the last 3 years of service.

For 2 years after leaving the service:

- No professional contacts towards staff of DG ENER and its associated Cabinet, as well as other Commission services which had been involved in policy files that had fallen under her responsibility during her past 3 years of service.
- No advising on, or contributing to, the preparation of submission of any funding proposals to the Commission.

Additionally, Ms Sikow-Magny was required to:

- Ensure that public communications on this new position include explicit information that her activity is subject to restrictions and conditions imposed by the Commission.
- Make restrictions and obligations transparent to the organisation.

11.

CONCERNS

Mr Marc VAN HOOF

Former Principal Legal Adviser in the Legal Service

End of Service: 1 June 2025

NEW ACTIVITY

Self-employed Consultant and Senior EU law Adviser within the Governmental Practice, Antitrust & Competition sub-team at Sheppard and Mullin, Brussels, Belgium.

Providing advice on competition and State aid files as well as on future regulatory cases, participating in conferences on EU competition and State aid law, organising some trainings for the firm's lawyers.

DECISION

The Appointing Authority authorised Mr Van Hoof activity under the following conditions:

For 1 year after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No advising Sheppard and Mullin or its clients on advocacy activities towards the Commission, in relation to matters for which he had been responsible during the last 3 years of service.

For 2 years after leaving the service:

- No professional contacts towards staff of the Legal Service, as well as other Commission services which had been involved in policy files that had fallen under his responsibility during his last 3 years of service.

Without any time limit, Mr Van Hoof cannot work directly or indirectly on any cases that had fall under his responsibility, or in which he had been involved, during the entire duration of his work at the Commission.

Additionally, Mr Van Hoof was required to:

- Ensure that public communications on this new position include explicit information that his activity is subject to ethical obligations as former staff member of the Commission, during the first 6 months upon starting the new role.
- When participating in conferences, clarify that he does not represent the position or interests of the Commission.
- Make restrictions and obligations transparent to Sheppard and Mullin and, where relevant, to its clients.