



Michael McGrath
Member of the European Commission
For Democracy, Justice, the Rule of Law
and Consumer Protection

Linas Pernavas
President
EPAC/EACN

rule-of-law-network@ec.europa.eu;
joze.strus@ec.europa.eu; annegret.kempf@ec.europa.eu;
joachim.herrmann@ec.europa.eu

secretariat@epac-eacn.org

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Dear Commissioner McGrath,

I am very grateful for having the chance to contribute to the preparation of the annual Rule of Law Report, a document of significant importance that plays a crucial role in promoting and maintaining an anti-corruption climate across all EU Member States.

Please allow us to update the report with the recent information on European Partners against Corruption (EPAC) and the European Contact Point Network against Corruption (EACN) activities in the year 2025, as well as with some latest developments in the activities of national anti-corruption authorities and police oversight bodies.

EPAC and EACN are two of the oldest and biggest anti-corruption networks in Europe. Over the years, the network grew to include new authorities from Europe and, currently, it comprises 120 anti-corruption and police oversight bodies as well as 7 observers from 40 countries¹. It includes 50 anti-corruption authorities and 22 police oversight bodies and 48 members that cover both functions. In addition to national authorities, RAI, Europol, Eurojust, EPPO and ICIN are also observers of the network or otherwise fully associated with the activities of the EACN.

EPAC/EACN activities in 2025

In February 2025, the Special Investigation Service (STT) has successfully completed the EU-funded international project "Best Anti-Corruption Practice Exchange" (BACPE), aimed at combating corruption. This two-year initiative provided members of the EPAC/EACN international network with the opportunity to participate in study visits, exchange best practices, and strengthen international cooperation in the fight against corruption and fraud across Europe. Throughout the project, a total of 49 study visits were conducted, involving 145 experts from 25 countries.

EPAC/EACN Working Group Situational Reports on Corruption, led by the Austrian Federal Bureau of Anti-Corruption (BAK), and which involved around 30 participants from various anti-corruption agencies and international organisations, has developed SITREP guidance². The corruption situation reports are essential analytical instruments that help agencies monitor corruption trends, assess risks, and inform

¹ Including Kosovo. This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

² https://epac-eacn.org/wp-content/uploads/2025/12/EPAC_EACN_Publication_Workshop_2025.pdf

both operational and strategic decision-making. The newly published SITREP guidance – presented during the EPAC/EACN Annual Professional Conference and General Assembly – serves both as a resource and a roadmap. It outlines key methodologies, reporting standards, and a structured approach to monitoring corruption trends – tools that help strengthen accountability, integrity, and good governance across Europe and beyond.

In July 2025 EPAC/EACN expressed concerns about the recent legislative changes in Ukraine (Law No. 4555-IX) that may affect the independence of specialised anti-corruption institutions, including NABU and SAPO. EPAC/EACN encouraged reforms to remain aligned with international standards and stands ready to support Ukraine through dialogue and expertise.

The 24th Annual Professional Conference and General Assembly of the EPAC/EACN took place on 24–25 November 2025, in the Hague, the Netherlands. This year, the conference was organised in cooperation with Eurojust. The event in the Hague was attended by more than 150 participants representing nearly 80 institutions from over 30 countries. Presentations were given by representatives of the European Commission, Council of Europe, European Public Prosecutor's Office, Europol, Eurojust, OLAF, anti-corruption agencies and police oversight bodies from different European countries.

The Conference primarily focused on strengthening cooperation between anti-corruption authorities and police oversight bodies, sharing practical experiences and challenges, and enhancing integrity and transparency across governance systems. Topics addressed measuring and preventing corruption, transparency in public procurement, innovative anti-corruption practices, education and awareness-raising, and resilience in post-conflict contexts.

A key outcome was the adoption of the Hague Declaration, which reaffirmed shared commitments across European anti-corruption authorities and oversight bodies to uphold the rule of law and strengthen institutional integrity. It is the final document of the conference, which addresses the members of the network, i. e. anti-corruption and police oversight bodies, as well as European national governments, European Union institutions and international organisations with proposed actions to strengthen anti-corruption commitments. The declaration stressed the need for stronger institutional independence, higher professional standards and enhanced international cooperation to more effectively prevent and combat corruption. Member institutions are encouraged to exchange best practices, deepen cross-border collaboration, and ensure continuous professional development across relevant agencies. The Declaration also called on states to guarantee adequate resources, open data transparency, and protection for prosecutors and investigators working on corruption cases. Additionally, it invited EU institutions and international organisations to support and strengthen common anti-corruption standards through technical assistance and coordinated efforts at the European and global level.

The stated declaration recommends to the EU institutions and international organisations to:

- Promote EU-wide and international standards that safeguard the operational independence of anti-corruption and police oversight bodies, as well as prosecution services, protecting them from undue political interference and guaranteeing adequate resources;
- Provide technical assistance, funding, and training opportunities for national anti-corruption and police oversight bodies, with a focus on new emerging corruption risks, innovation and digitisation, cross-border illicit financial flows;
- Facilitate structured platforms for member states and partner countries to share methodologies, training resources, digital tools, and legislative innovations, thereby building a common anti-corruption knowledge base;

- Work towards aligning anti-corruption legislation, asset recovery mechanisms, and whistleblower protection frameworks across EU and Council of Europe member states and partner jurisdictions, reducing loopholes for cross-border corruption;
- Ensure that anti-corruption efforts by EU institutions and international organisations are coherent, mutually reinforcing, and avoid duplication, thereby maximising collective impact.

During the Conference, the Director of the Special Investigation Service (STT), Linas Parnavas, was elected EPAC/EACN President for a second two-year term. The General Assembly also elected Vice-Presidents and Deputy Vice-Presidents from France, Portugal, Austria and Romania. The EPAC/EACN General Assembly, which is network's ultimate decision-making body, also accepted six new members and observers to the EPAC/EACN network from France, Norway, Spain, Switzerland and Ukraine.

Also, on 24 November 2025, in the margins of the 24th EPAC/EACN Annual Professional Conference and General Assembly, a group of high-level representatives from national police oversight bodies, anti-corruption authorities, and judicial institutions gathered in the Hague for the High-Level Meeting of Police Oversight and Anti-Corruption Authorities (HLM) hosted by Eurojust. The discussion held under the rules of the Chatham House brought together more than thirty senior officials from across Europe, along with representatives of EU bodies, including the European Commission, Europol, the European Public Prosecutor's Office, and the European Anti-Fraud Office.

The meeting was convened at a time of rapidly evolving corruption risks, marked by geopolitical tensions, hybrid threats, digital vulnerabilities, and increasing pressure on law enforcement and oversight systems. Participants engaged in a strategic, closed-door dialogue focusing on corruption's impact on security, democratic governance, public trust, and the rule of law. They explored how institutional integrity can be strengthened across Europe, what capacities are needed to detect and address sophisticated corruption schemes, and how national and EU-level actors can improve cooperation to counter threats that cross borders and sectors.

The High-Level Meeting provided an opportunity to reflect on four overarching questions shaping today's anti-corruption landscape:

- how corruption affects current global and regional developments;
- what skills and resources authorities need to uncover complex and concealed corruption schemes;
- what barriers impede the prosecution of high-level corrupt actors;
- and how combined efforts across sectors can create a more resilient, transparent, and accountable system of governance.

Against this backdrop, participants exchanged national experiences and presented concrete proposals for strengthening cross-border cooperation, improving analytical and investigative capacities, and reinforcing the role of EPAC/EACN as a platform for peer learning, coordination, and collective action.

The Eleventh Session of the Conference of the States Parties to the United Nations Convention against Corruption (UNCAC CoSP11) took place from 15 to 19 December 2025 in Doha, Qatar as the main global anti-corruption forum under the UNCAC framework. Within the CoSP11 programme, EPAC/EACN, together with the Organisation for Economic Co-operation and Development (OECD), hosted a side event titled "Harnessing Emerging Technologies to Combat Corruption" on 16 December 2025, focusing on how new digital and analytical tools can reshape anti-corruption practices worldwide.

This session brought together representatives from leading international organisations, national authorities, civil society and technical experts (including the OECD Working Group on Bribery, the World Bank and the European Cybercrime Centre at Europol) to discuss concrete applications and opportunities where emerging technologies, such as data analytics, AI and system-wide transparency tools, can strengthen investigations, facilitate evidence-based policy making, and support accountable governance.

Challenges and main priorities observed from EPAC/EACN perspective:

1. Organisation, accountability and operational independence of law enforcement agencies are of high importance.

Among other, EPAC/EACN objectives are to promote independence, impartiality, and legitimacy, as well as accountability, transparency, and accessibility in all systems created and maintained for the independent oversight of policing and the anti-corruption work, and cooperating with other organisations, authorities, networks, and stakeholders in compliance with its objectives.

Speaking of current challenges and main priorities for anti-corruption and police oversight authorities in Europe, I would like to stress that various assessments of countries anti-corruption environment carried out by international organisations prove that on a national level, the dedicated law enforcement and other related authorities as the main actors in fight against corruption frequently lack operational independence. This could be further explored in the upcoming Rule of Law Report.

Moreover, EPAC/EACN Board continues observing the situation concerning some of its member organisations, which are based in several EU or Council of Europe Members States, where governments are preparing plans and publicly endorsing abolishing specialized anti-corruption institutions and transferring their powers to ordinary police or prosecution units.

In particular, the EPAC/EACN Board was closely monitoring situation regarding the recent adoption of the Law No. 4555-IX by the Parliament of Ukraine (Rada), which came into force on 23 July 2025. This legislation significantly expands the powers of the Prosecutor General of Ukraine, allowing for intervention in ongoing investigations conducted by the National Anti-Corruption Bureau of Ukraine (NABU) and the Specialised Anti-Corruption Prosecutor's Office (SAPO), without judicial oversight. With due respect to the sovereignty of Ukraine and challenging context of ongoing defence of its territorial integrity, we emphasise the critical importance of safeguarding the independence, integrity and effectiveness of specialised anti-corruption institutions. Independence is not only essential to ensuring fair and effective investigations, but is also a cornerstone of democratic governance, accountability and public trust. These changes risk undermining the autonomy and operational capacity of institutions that have been critical in advancing Ukraine's anti-corruption reform agenda, particularly in the framework of Ukraine's EU and OECD accession processes. Eventually, Ukraine has reversed the planned changes that would have undermined NABU's independence and expanded the Prosecutor General's powers over anti-corruption investigations.

The EPAC/EACN Board is still closely monitoring developments regarding the plans to close down the Central Anti-Corruption Bureau (CBA) of the Republic of Poland. In December 2024, the Polish Council of Ministers approved a draft law to abolish the CBA and distribute its powers between three other existing agencies. The draft law is currently being discussed in the parliament.

While underlying reasons for considering dismantling any national anti-corruption institution may be different and each situation may have convincing arguments, EPAC/EACN wishes to raise the importance

of the international standards that highlight the continuous need for specialised institutions and persons in the area of detection, investigation, prosecution and adjudication of corruption offences.

Anti-corruption institutions are a cornerstone of democratic governance and the rule of law. They help protect the public interest by detecting, preventing, and investigating corruption risks and offences, and by reinforcing integrity standards across the public sector. When they function effectively, they strengthen trust in state institutions, support fair competition, and safeguard public resources – outcomes that are widely recognised in international anti-corruption frameworks and integrity standards.

At the same time, it must be acknowledged that corruption can occur at any level of power – including among senior officials and political decision-makers. Where public authority is combined with discretion over budgets, appointments, procurement, licensing, or regulatory decisions, incentives and opportunities for undue influence increase. In such contexts, institutions responsible for countering corruption may face pressure precisely because their work can affect politically exposed individuals, powerful networks, or entrenched interests. This reality creates a structural risk: if anti-corruption bodies are vulnerable to political interference, sensitive cases may be delayed, narrowed, or discouraged, and preventive work may be weakened by selective enforcement or constrained access to information.

For these reasons, operational independence is not a secondary institutional preference — it is a prerequisite for credibility and effectiveness. International standards explicitly underline that states should ensure that anti-corruption bodies can perform their functions “effectively and free from any undue influence,” including through appropriate legal safeguards, resources, and institutional autonomy.

I would like to stress that the independence of anti-corruption institutions was also highlighted as one of the key issues during the annual conference, and many participants indicated that it remains a shared concern. Concerns were raised about attempts to weaken the independence of institutions responsible for safeguarding integrity.

2. Developing data-sharing and analytical/forensic capacities, investigation and prosecution

Timely data-driven fraud risk assessment is essential to effectively safeguard the EU’s financial interests. However, the success of new technologies such as AI rests on data quality. Therefore, the European Commission should lead a more unified approach to relevant data collection in Member States, such as requiring the collection of detailed data on public procurement. We would also support the compulsory EU-wide adoption of the ARACHNE+ tool. This would close information gaps and provide a truly effective detection tool.

3. EU Anti-Fraud Architecture review

From our perspective, the greatest challenge in EU spending is that the demand for rapid, full spending of funds is in direct tension with, and often undermines, the need for robust legal and quality controls. This creates a high-risk environment, which is most visible in the Cohesion Policy and the Common Agricultural Policy. By sector, this translates into high-value infrastructure projects in transport, energy, and the environment, as well as high-frequency, systemic issues in agriculture and rural development. Concurrently, the “performance-based” model of the Recovery and Resilience Facility (RRF), which decouples payments from actual costs, also raises substantial accountability concerns. This structure may limit the Commission’s ability to apply targeted financial corrections for procurement violations, except in the most severe cases. This, combined with the intense pressure to disburse all funds by the 2026 deadline, creates a significant new risk.

I must emphasize that the dominant fraud patterns are often not isolated errors but show signs of grouped and systemic action. This brings into view the necessity of increasing the role of anti-corruption in the EU

anti-fraud architecture. As we know, corruption is not merely a type of fraud; it frequently plays the critical role of the enabler of fraud offenses.

Given this direct link between fraud and corruption, we find it is essential that the Anti-Fraud Architecture review is developed in close synergy with the upcoming EU Anti-Corruption Strategy. EPAC/EACN welcomes your initiative on the proposed EU Anti-corruption Strategy, and we've offered our full support and practitioner's expertise for its development. Given the extent of the EPAC/EACN network, it is uniquely positioned to act as a practical bridge, helping to ensure these two critical strategies are aligned and mutually reinforcing.

4. Improving the effectiveness of investigation and prosecution of the protection of the EU's financial interests (PIF)

Safeguarding the integrity of EU financial instruments and national contributions is a shared European priority. Hence, there is a growing need for closer operational cooperation between European anti-corruption and law enforcement institutions. Protecting the European Union's financial interests is essential for maintaining trust in EU institutions, ensuring fair use of public resources, and safeguarding the integrity of the internal market. Corruption affecting EU funds can undermine the effectiveness of EU policies, distort competition, and divert resources away from citizens, businesses, and communities that rely on them. Such corruption can manifest in various forms, including bribery to secure grants or contracts, manipulation of procurement procedures, falsification of project documentation, collusive bidding, conflicts of interest in decision-making, embezzlement of EU-funded resources, or fraudulent reporting intended to conceal misuse of funds. These practices not only cause financial loss but also weaken democratic governance and public confidence. For these reasons, strong preventive measures, effective oversight mechanisms, and robust cooperation among national authorities, EU bodies, and law enforcement are indispensable in securing the EU's financial interests and combating corruption in all its forms.

We know that in some Member States, European Delegated Prosecutors have a growing workload which will impact their capacity. Therefore, an increase in resources and staff should be considered. At the same time, in some Member States, the EPPO's mandate and functions are still not well known to all law enforcement agencies. Accordingly, the EPPO should raise awareness in countries with low activity.

5. Enhancing cooperation between national and EU-level actors to counter threats that cross borders and sectors

Corruption is a multidimensional challenge that undermines development, human rights, institutional resilience, economic stability, and democratic legitimacy. During the High-Level Meeting of Police Oversight and Anti-Corruption Authorities (HLM) in the Hague participants underlined the growing interconnectedness between corruption, organised crime, foreign influence, cyber-enabled crime, and illicit financial flows. Against this backdrop, the HLM aimed to clarify what skills, resources, and strategies are required to identify hidden corruption mechanisms, protect public institutions from internal and external vulnerabilities, and ensure accountability for both public officials and private-sector actors involved in wrongdoing.

Throughout the exchanges, special attention was given to persistent difficulties in bringing high-level and cross-border corruption cases to justice, including legislative gaps, limited access to financial intelligence, insufficient asset recovery tools, and the increasing technological sophistication of criminal networks. The meeting also emphasised the importance of strengthening preventive measures, cultivating integrity in public institutions, ensuring the independence of oversight and anti-corruption bodies, and enhancing cooperation between law enforcement, administrative authorities, civil society, and private-sector partners.

We would also like to draw your attention to cooperation between EU institutions. We are aware that cooperation between OLAF and the EPPO sometimes has mixed results.

This highlights the need to better align cooperation between OLAF and EPPO. To this goal, OLAF could further strengthen the early identification of fraud and corruption crimes to refer such cases to the EPPO. Also, once an EPPO investigation has started, OLAF should coordinate its complementary investigations with the prosecutor in charge of the EPPO investigation. Additionally, European Delegated Prosecutors should be made more aware of OLAF's options for early penalties and recovery. This would enable them to use these tools more effectively in relevant cases.

Conclusion

As President of EPAC/EACN, I look forward to working closely with you in our shared commitment to preventing and combating corruption, strengthening transparency, and ensuring accountability across public institutions. The European Commission's support is essential to reinforcing the work of anti-corruption authorities and police oversight bodies, and your leadership will be a key catalyst in taking these efforts further.

Let me conclude by thanking for your attention to the challenges that corruption continues to pose across Europe. EPAC/EACN remains a steadfast partner in addressing this issue and looks forward to continued cooperation and to contributing to the European Commission's work in this area.

Yours sincerely,

Linus Pervavas

EPAC/EACN President

Director of Special Investigation Service (STT) of the Republic of Lithuania