

Annual Activity Report 2025

Legal Service

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LEGAL SERVICE IN BRIEF

The Legal Service is an internal horizontal Presidential Service under the authority of and reporting directly to the President of the Commission, Ursula von der Leyen.

The Legal Service provides high quality and timely legal advice and defends the interests of the Commission and of the Union in litigation before the courts and tribunals. The Legal Service contributes to the development and implementation of all initiatives of the Commission and ensures that the provisions of the Treaties are correctly interpreted and applied, so that all Commission acts and proposals are in accordance with the law of the European Union and international law. The Legal Service also represents the Commission in proceedings before the Court of Justice of the European Union and other international courts, such as the EFTA Court or WTO panels, as well as national courts.



The Legal Service provided high quality legal expertise at all times, even if often deadlines were very short. Its flat organisational structure contributes to effective and efficient information flow and decision making, facilitating the fulfilment of its objectives.

During 2025, the Legal Service dealt with:

- 1 850 on-going cases before the Union Courts and 815 cases before national courts,
- replied to 15 777 consultations ⁽¹⁾ of which 9 883 arrived through the Commission's decision-making process ⁽²⁾,
- gave its opinion on 4 920 replies to parliamentary questions and 614 petitions,
- unprecedented work for the simplification of European legislation (more than ten omnibus packages) to reduce the red tape accumulated over the years.

As of 1 December 2025, a new Director-General for the Legal Service was appointed. At the end of 2025, the Legal Service had 443 staff members: 95% work in teams providing legal advice and legal representation, of which 16% focus on legislative drafting. The remaining 5% of total staff provide internal support (HR, finance, IT and communication). Administrative spending in 2025 was EUR 4.0 million of which EUR 3.1 million was used to pay legal fees. The Contracts and Recoveries Unit recovered EUR 26.0 million.

⁽¹⁾ Consultations registered in ARES

⁽²⁾ Consultations registered in Decide

EXECUTIVE SUMMARY

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

The annual activity report is a management report of the Director-General of the Legal Service to the College of Commissioners. Annual activity reports are the main instrument of management accountability within the Commission and constitute the basis on which the College takes political responsibility for the decisions it takes as well as for the coordinating, executive and management functions it exercises, as laid down in the Treaties ⁽³⁾.

The Legal Service is responsible for providing legal advice and for representing the Commission before Union, national and international courts and tribunals. This work must be of the highest quality and be delivered in due time, and the representation of the Commission before the Union courts must be ensured in all official languages of the Union. The flat organisational structure of the Legal Service allows for quick adaptation to new situations, it allows for fast dissemination of information, and to quickly, and yet thoroughly, respond to every request in whichever legal field it may concern.

Through both its advisory role and its litigation role, the Legal Service contributes to all 7 priorities of the von der Leyen Commission and specifically **to General objective No 8: A modern, high-performing and sustainable European Commission.**

The Legal Service is the lead service within the Commission for relations with all judicial bodies. It is also responsible for the negotiations concerning the accession of the European Union to the European Convention on Human Rights (ECHR), which contributes to **General objective No 6: A global Europe – leveraging our powers and partnerships.**

The Legal Service organised its third **annual conference** on April 4, 2025, with participation by several distinguished speakers on **international sanctions**, particularly in the context of the Russian aggression of Ukraine, and the relations between **EU law and arbitration.**

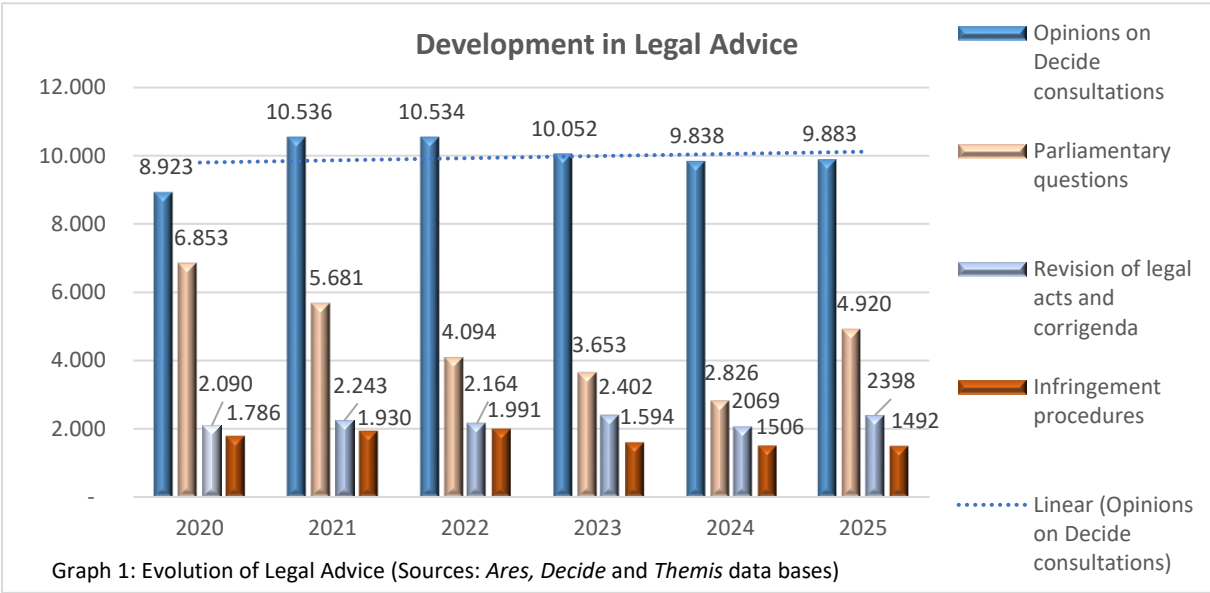
In 2025, the Legal Service worked to ensure that all measures proposed or adopted by the Commission were legally sound and that they could be successfully defended before the EU courts and national courts. The challenges of very short deadlines, political urgencies and sensitivity, more complex and more voluminous content continue to put pressure on the Legal Service's staff.

The Legal Service gave its **opinion on 9 883 legal acts**⁽⁴⁾; of which **2 398** underwent **legal revisions**; replied to 2 826 parliamentary questions and dealt with **1 492 infringement**

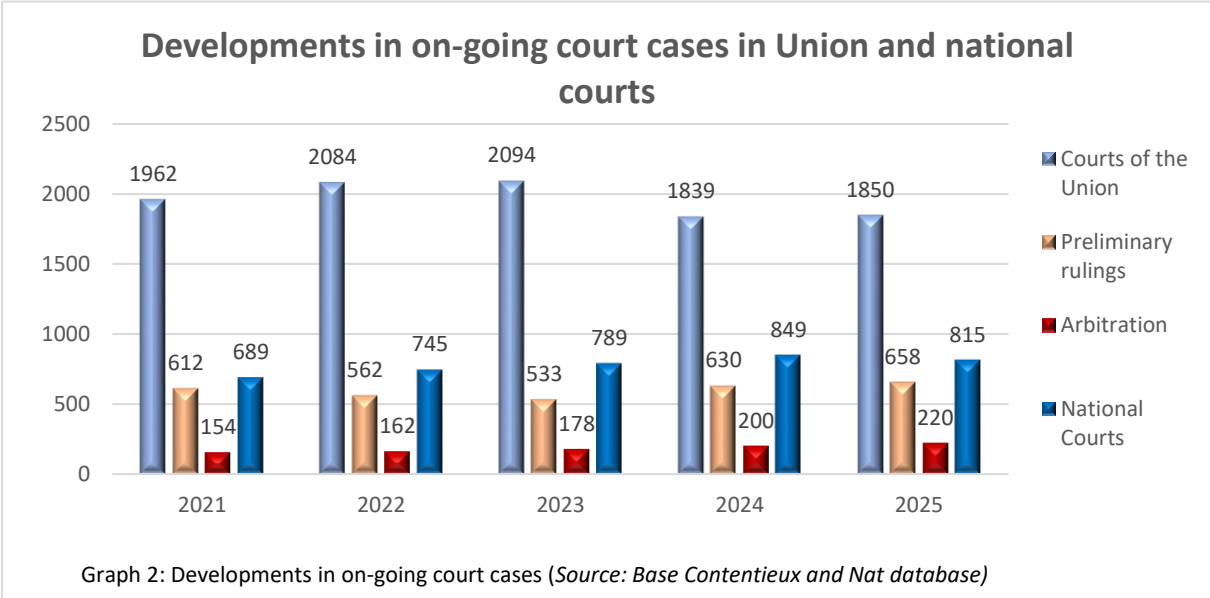
⁽³⁾ Article 17(1) of the Treaty on European Union.

⁽⁴⁾ *Decide* is the corporate IT tool supporting the Commission's decision-making process, from planning to Commission adoption.

procedures in 2025. The number of urgent consultations, **fast-track**, has more than tripled to a total of **379** consultations in 2025, see section 1.1.2. Graph 1 below shows the 6-year evolution of the various types of consultations in the Commission’s decision-making process.






In 2025, the Legal Service defended the interests of the European Commission in **1 850 on-going cases** before the courts of the Union, including by assisting the European Court of Justice and the EFTA Court in **658 preliminary rulings** and **220 arbitrations**. The Legal Service also represented the Commission in **815 on-going national court cases**. Graph 2 shows the developments in legal representation for the different categories of court cases.



The Contracts and Recoveries Unit **recovered EUR 26 million of claims for the benefit of the Commission**, and therefore of the Union’s budget, representing almost 10% of the total amount of unrecovered claims being managed by the Unit.

By the end of 2025, most of the modernisation actions identified during the ‘Reform of the Legal Service’ project have been implemented, including finalisation of the **workload assessment report**. The recommendations of this assessment will be followed up by management.

B. Key performance indicators

KPI #	KPI Title	Baseline (2024)	2025	Interim milestone (2027)	Target (2029)	
Specific objective 6.1: Negotiation on Accession of the European Union to the European Court of Human Rights (ECHR).						
6.1.1	Progress made in the negotiations to accede the ECHR	Court of Justice decision confirming the mandate for the European Commission to negotiate on the accession to the ECHR	Submission to the Court on 21 November 2025		Proposal for signature and conclusion of the accession agreement before end 2027	Entry into force of the accession agreement before 2029
Specific objective 8.1: Independent legal advice is provided on all Commission legal proposals for adoption by the Council and the Parliament to ensure full benefit of rules for the EU Citizens, to have the necessary legal clarity, transparency and high quality and to reflect the interest of policy objectives						
8.1.1	The Director-General in the Legal Service assists in all Commission and Heads of Cabinet meetings, providing legal advice.	100%	100%		100%	100%
Specific objective 8.2: Defending the interests of the European Commission, ensuring full benefit of law for all EU citizens, in all cases in courts, tribunals and other arbitration bodies.						
8.2.1	Presence by Legal Service staff or by external lawyers contracted to represent the Legal Service (mainly in national court hearings) at the competent court to ensure the defence/interest of the European Commission.	100%	100%		100%	100%

The table features a colour-coded (left-right) bar system to represent the evolution of the indicator in comparison with the interim milestone. A green colour (bar on the right) indicates that the indicator is moving in the correct direction, whereas a red colour (bar on the left) suggests a movement away from the interim milestone. For numerical indicators, the size of the bar also indicates proximity (distance) to the interim milestone.

C. Key conclusions on internal control and financial management

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

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

All the above elements have been assessed to determine their impact on management's assurance about the achievement of the control objectives. Further details can be found in section 2 on Internal Control and Financial Management.

In conclusion, management has reasonable assurance that, overall, suitable controls are in place and working as intended; risks are being appropriately monitored and mitigated. The Director-General, in his capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance.

D. Provision of information to the President of the Commission

In the context of the regular meetings held during the year between the Legal Service and the President of the Commission, via her cabinet, on management matters, the main elements of this report and assurance declaration have been brought to the attention of President von der Leyen.

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

The teams in the Legal Service possess in-depth knowledge in each specific part of EU legislation and replies to all requests being sent from the Commission, its DGs and services. Beyond the figures which will be presented further on in this report **THE MOST NOTEWORTHY LEGAL ADVICE AND LEGAL REPRESENTATIONS PROVIDED BY THE LEGAL SERVICE IN 2025 WERE:**

The **AFFAIR Team**, responsible for business law and information society, advised amongst others, on the application of **Digital Services Act (DSA)** and **Digital Market Act and (DMA)** Regulations and the **Artificial Intelligence Act**. It was heavily involved in the preparation of the **Savings and Investment Union**, the **28th Regime** proposal and the **Military Mobility** Regulation. It worked on litigation in the **Financial Services**, on a request for an opinion on the nature of the envisaged **Air Transport Agreement** with Oman and **on international arbitration** connected to the **Energy Charter Treaty**. It continued working on negotiations on the **Special Protection Certificate** in the field of **Intellectual Property**.



In two court cases managed by the **AIDE Team**, (State aide) the Court explained that the Commission does not have to assess compliance with provisions of Union law other than those on state aid when the Commission examines a state aid measure unless there is an intrinsic link between that measure and the provision concerned, that the Commission does not have to justify why it does not check compliance of the aid measure with specific provisions, and that when it does check compliance the Commission must give full reasons for its conclusions. The AIDE team in its work on the **Foreign Subsidies Regulation** dealt with the **draft Guidelines on key concepts** in that legislation, which the Commission adopted in January 2026.

The **AGRI Team**, being responsible for agriculture and fisheries, contributed to the preparation of the **new MFF package** and of several new legislative proposals, in particular on **organic products, pesticides** and **feed additives**. It also followed ongoing legislative procedures concerning the simplification of the CAP, the **wine market, unfair trade practices** in agriculture, **animal welfare** and **new genomic techniques**. The team was also involved in the negotiations of the **new trade agreement with Morocco** on Western Sahara products. On fisheries, the team advised DG MARE on **annual fishing opportunities** and the **Ocean Pact**, including the architecture of the future Ocean Act.



The **BUDG Team**, specialised in the area of budget and taxation, was closely involved in the adoption of all Commission proposals in relation to the **new Multiannual Financial Framework (MFF)**, notably on the **National and Regional Partnership Plans**, the **European Competitiveness Fund**, and **Horizon Europe**, and assists in the ongoing negotiations with the European Parliament and the Council. The team provided legal advice on the application of the enabling conditions under the **Common Provisions Regulation**, notably in the **numerous cases concerning Hungary**. It advised on **solutions for e-commerce** parcels in the ongoing negotiations of the **Union Customs Code**. It worked on implementing and delegated acts, and reviewed proposals necessary for the **Carbon Boarder Adjustment Mechanism (CBAM)** to enter into force. The team **defended the solidarity contribution** before the Court and in arbitral proceedings under the **Energy Charter Treaty** and **defended the validity of Pillar 2**.

The competition law, **CONC Team**, advised in: **antitrust** enforcement cases against large digital platforms such as **Google, Meta, Microsoft and Apple**; against **cartels**; in the area of distribution for the **fashion industry**, in the **rail and air transport sector** and in the **pharmaceutical sector**; assisted in hundreds **of merger control procedures**, worked on various files in the **Digital Markets Act (DMA)** and litigated in many cases including those against **Google, Meta and Apple**.

The **EUROZONE Team**, focusing on economic questions, advised on: the different **proposals for a new Multiannual Financial Framework**, the **Ukraine Loan Cooperation Mechanism** on exceptional **macro-financial assistance to Ukraine**, the **Ukraine Facility**, the **European Defence Industry Programme**, the **SAFE instrument**, the **Omnibus programme for defence**, the **new economic governance framework** introducing major changes to the implementation of the **Stability and Growth Pact**, the **Conditionality Regulation**, on the **rejection of the request of Hungary** to lift the measures concerning universities maintained by public interest trusts, the proposal on the **digital Euro**, **the protection of Union's financial interests** and **the implementation of the RRF Regulation**.

The **INST Team** was in charge of files, including: the negotiation of **the framework agreement between the Commission and the European Parliament**; the dialogue with the Court of Justice in particular in view of the adoption of the **rules of procedure of both the Court of Justice and the General Court**; the finalisation of the negotiations for the **accession of the EU to the European Convention of Human Rights**; with the submission of a request of an opinion by the Court of Justice in this respect; the judicial representation of the Commission **in all interinstitutional disputes** before the Court of Justice.

The Justice, Freedom and Security, **JLS Team**, assisted the Commission in finalising the work needed with DG HOME and in the Council with the member states in order to implement the numerous legal acts in the **Area of Freedom, Security and Justice** forming part of the **Pact on Migration and Asylum**, in the field of **criminal law** and in negotiating several important international agreements in cooperation with DG JUST and DG HOME. The team dealt with many court cases in the fields of **Union citizenship, private international and criminal law, migration** and **asylum**, many of which raised important and novel legal questions.

The **MIMED Team**, responsible for the internal market for goods, enterprise, energy, environment, climate and defence, dealt in particular with legislative proposals for an **EU Space Act**, for a **Biotech Act I**, for a **Critical Medicines Act**, for an **environmental omnibus** and for a **Grids Package**. It brought before the Court several important infringement actions against Member States in the field of the environment and supported the co-legislators in defending the legality of several legislative acts.

The **PERS Team**, handling staff matters, dealt with **individual decisions on requests and complaints** from staff members in all fields of the Staff regulations (rights and obligations, career, EPSO competitions, working conditions, emoluments and social security, etc.), with **consultations relating to acts of general application** in that field of law, with **disciplinary measures**, as well as with **draft notices of competition**. The team represented the Commission **before the Union Courts** in civil service law cases. The team manages also many **national cases** (subrogation)

The external relations, **RELEX team**, contributed to the institutional follow-up of the Gabon judgement, to concluding **negotiations with Switzerland**, worked on the **Russian frozen assets** (windfall profits and G7 loan mechanism) and the **Special Tribunal for the Crime of aggression against Ukraine**, participating in all Core Group meetings.

The social, employment and consumer protection **SOC Team**, replied to consultations in **Employment and Social policy, health and food law, non-discrimination and consumer policy and education**. The team advised on the two **Multianual Financial Framework** proposals for new financial programmes **Erasmus+** and **AgoraEU**. It dealt primarily with preliminary reference cases, actions for annulment and infringement cases. It is worth mentioning the judgement on **adequate minimum wages**, proposed by the Commission following the advice of the Legal Service.

The **TRADE Team**, advised on Commission investigations and litigated in cases on **Trade Defence Instruments** (TDI) before EU courts, and the first case under the **Trade and Cooperation Agreement with the United Kingdom** with a successful outcome, in defensive WTO cases against **Indonesia**, and offensive cases against **China** in the field of intellectual property rights including a successful appeal procedure under the Multi-Party Interim Appeal Arbitration Arrangement of the WTO, in arbitration cases with **Nord Stream 2** and **Klesch**, advised on the **Industrial Accelerator Act**, environmental and internal market proposals, ongoing and completed negotiations for **Free Trade Agreements** such as with **MERCOSUR**, on the EU's relations with **Ukraine** and **other candidate and neighbouring countries**, and in **Foreign Direct Investment**.



In 2025, the **MAREC Team** (S.J.R.3, Commission's procurement, contracts and enforced recoveries) **recovered a record amount of EUR 26 million** (including competition fines) from debtors in the Member States and in third countries. It also launched a **procedure before the Belgian Cassation Court for the damage suffered (EUR 20 million)** as a result of the elevator cartel. The team also **advised on the Joint Procurement Agreement (JPA)** with the Member States for the CBAM Common Central Platform.

1.1. Legal Advice

The Legal Service assists the President of the European Commission, the Commission, its DGs and Services in all areas of the Commission's activities and in particular:

- preparing legislative and non-legislative proposals,
- drafting legislation,
- conducting international negotiations,
- fulfilling its role as guardian of the Treaties, e.g. in the framework of infringement procedures,
- adopting implementing and delegated acts.

The extensive horizontal duties as legal advisor to the Commission contributes to **General objective No 8: A modern, high-performing and sustainable European Commission.**

In its advisory function, the Legal Service ensures that all Commission acts and initiatives are in accordance with the Treaties and correspond to the highest requirements of legal certainty and clarity. The Legal Service intervenes throughout the process in the preparation of legal acts, both formally and informally. **Legal advice provided on documents with legal**

implications may contribute to a reduction in the number of litigations, hence, contributes to efficiency gains throughout the Commission.

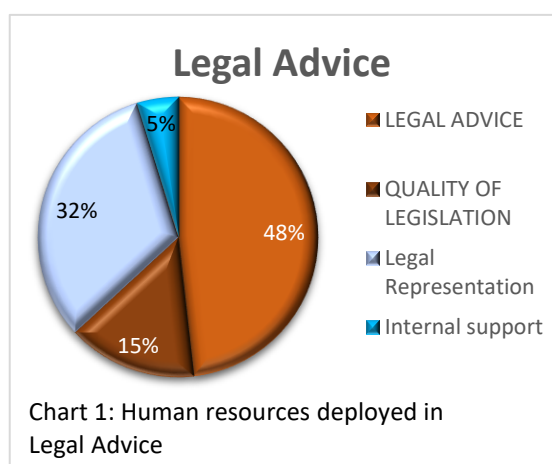


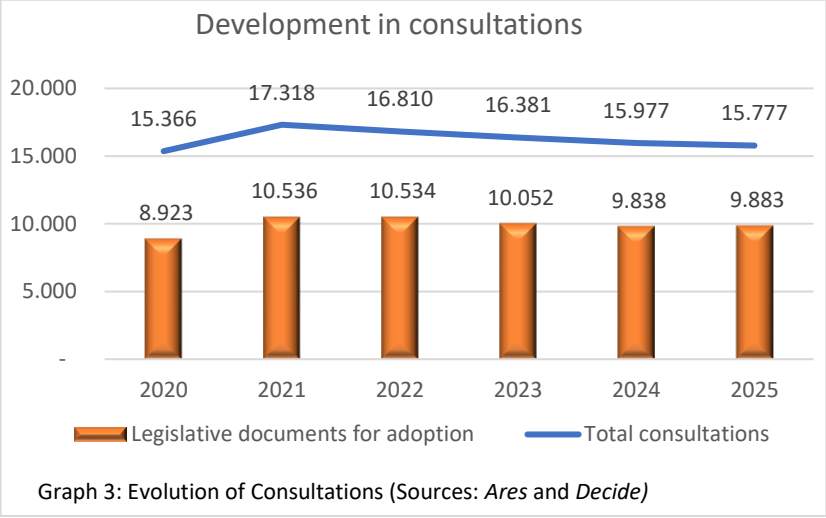
Chart 1 presents the proportion of staff working time giving legal advice. Approximately 63% of human resources is devoted to legal advice. However, in the thematic teams, approximately 60% of the working time is spent giving legal advice, while for the Quality of Legislation team, most of their time is spent giving legal advice.

1.1.1. Consultations

The Legal Service received 15 777 consultations in 2025, of which 9 883 were on legislative documents to be adopted by the Commission. The Legal Service is required to issue its opinion on all documents which may have legal implications, on both legislative and non-legislative proposals. Though the total number of consultations has decreased slightly over the past five years, consultations have become more voluminous and complex, adding on to the total workload.

Through an efficient mobilisation of internal resources, swift internal decision-making procedures and a high sense of commitment from its staff, the Legal Service is able to promptly meet the requests for legal advice. The lawyers provide timely and thorough legal assessments, despite the often very tight deadlines, the high legal complexity and the

sensitivity of the issues at hand. In 2025, the Legal Service reached its set target on **replies within the deadline to 92% of all formal consultations**. Graph 3 presents the development in consultations over the past six years. The number of consultations per legal area is presented in Annex 2, Section 1.1, Table 1 and Graph A.



The Legal Service is also consulted by DGs, services and Cabinets on legal questions in a more informal and direct basis including ‘exploratory’ discussions or very urgent legal issues, often by a simple email, or assists the services in the formulation

of replies to citizens and interested parties. For example, the Legal Service regularly assists the Spokesperson’s service by giving replies to journalists regarding court cases.

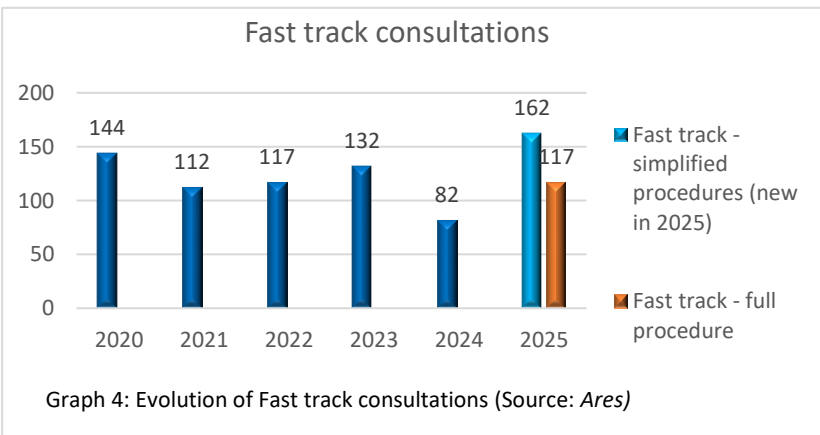
of replies to citizens and interested parties. For example, the Legal Service regularly assists the Spokesperson’s service by giving replies to journalists regarding court cases.

1.1.2. Fast-track

There has been a noticeable increase in the number of fast-track consultations in 2025 to a total of 279, due to, among other factors, the increase in number and the urgency on e.g. the aggression against Ukraine, the energy crisis and the supply-chain crisis, but also on competitiveness, security and defence. Therefore, new rules on fast-track consultations were introduced by the end of 2024 with the aim to improve efficiency in the process ⁽⁵⁾. In cases where there is no need for a written text to be discussed, a simplified procedure allows for their adoption without a meeting. Consequently, fast-track consultations are presented in two categories: “full procedure” and “simplified procedure”.

Fast-track consultations put a particular constraint on the Legal Service due to, their political sensitivity, that they sometimes may contain hundreds of pages and their urgency which requires the Legal Service to reply within 24 or 48 hours, sometimes with even *extremely* urgent deadlines of less than 12 hours.

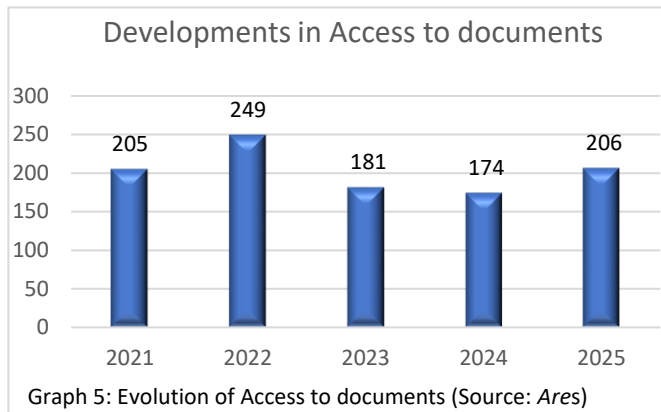
As from 2025, there is a split into the two categories of fast-track consultations presented in graph 4. More information is set out in Annex 2, Section 1.1, Table 1.



⁽⁵⁾ COMMISSION DECISION (EU) 2024/3080

1.1.3. Access to documents

The Legal Service is responsible for the handling of documents of which it is the author, such



as: legal opinions and documents related to court proceedings in which it represented the Commission; its submissions before the EU, national and international courts and arbitration bodies; and the submissions of other parties ⁽⁶⁾. In 2025, the Access to Documents team dealt with 206 initial requests for access to approximately 642 documents. More information is set out in Annex 2, Section 1.1, Table 1.

In the area of requests for access to documents, the Institution team is consulted on all draft decisions taken by the Secretary-General and by the Director-General of OLAF by delegation of the College at the confirmatory level of the administrative procedure. In 2025, the Legal Service gave its opinion on 399 consultations, 348 from SG and 15 from OLAF.

Requests for access to documents also generates litigation. In 2025, 18 new actions for annulment were brought against Commission confirmatory decisions, and 2 appeals against judgements of the General Court were lodged. 16 judgements and 17 orders were handed down in 2025. At year-end 2025, there were 40 pending cases.

1.1.4. Other consultations

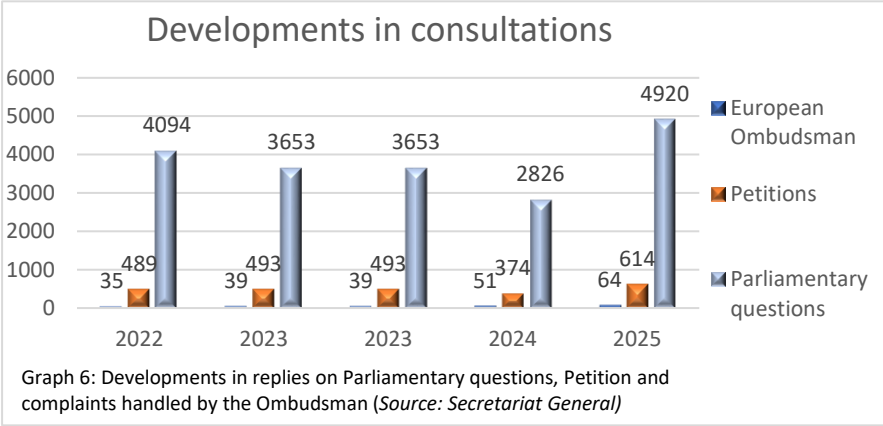
The Legal Service was consulted and gave its legal opinion on all **4 920 replies to parliamentary questions**; a significant increase compared to previous years.

The European Parliament asks the Commission for information/preliminary investigations on **petitions** which allege a lack of compliance with EU law on the part of a Member State or an institution. The Secretariat-General attributes the requests to the competent lead service. The Legal Service gives legal advice on all petition consultations. In 2025, there was a significant increase compared to previous years. The Legal Service gave its opinion on **614 petitions**.

When the Legal Service is consulted on draft Commission replies to the **Ombudsman**, it must ensure that the law is respected, and that there is a coherent approach across the Commission as regards the acceptance of the Ombudsman's recommendations and suggestions for improvements in the Commission procedures. In 2024, the Legal Service provided its opinion on **64 draft replies to the European Ombudsman**.

⁽⁶⁾ In its judgement in case C-213/15P on 18 July 2017, the Court confirmed that the Commission cannot refuse access to written submissions by the Member States and third parties held by it, on the sole grounds that they are documents relating to court proceedings of which it is not the author.

Graph 6 shows the development over the past five years on questions from the Parliament, the Ombudsman and Petitions. More information is set out in Annex 2, Section 1.1, Table 1.



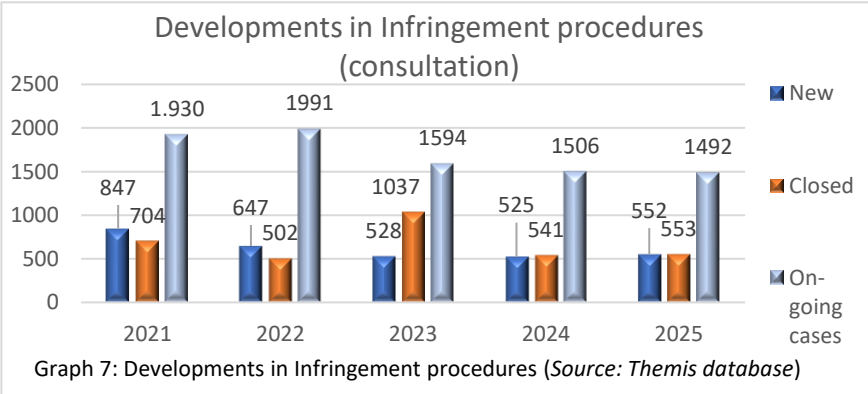
1.1.5. Infringement procedures

It is indispensable that EU law is correctly transposed, implemented and applied in the Member States. To assist the Commission in its role as **guardian of the Treaties**, the Legal Service provides advice throughout the pre-litigation procedure, and it represents the Commission before the Court of Justice in infringement cases. The Legal Service is consulted on all proposals for decisions on infringements submitted for adoption by the College and assists the Secretariat-General in the infringement decision-making process.

The Secretariat-General and the Legal Service organise an annual infringements coherence review exercise spanning three months of meetings, at technical and senior management level, with all DGs handling infringement cases. This represents an important tool to ensure consistency of the Commission's implementation work and provide guidance on recurring legal and procedural issues. It helps to ensure that all open infringement cases are actively and consistently pursued or closed rather than staying dormant.

During 2025, the Legal Service, in close cooperation with the Secretariat-General, prepared a new Communication modifying the Commission's methodology for the calculation of financial sanctions in infringement procedures as well as internal guidance on indicative ranges for seriousness factors for second Court referrals (Art. 260(2) TFEU) and on the execution of Court judgements imposing sanctions.

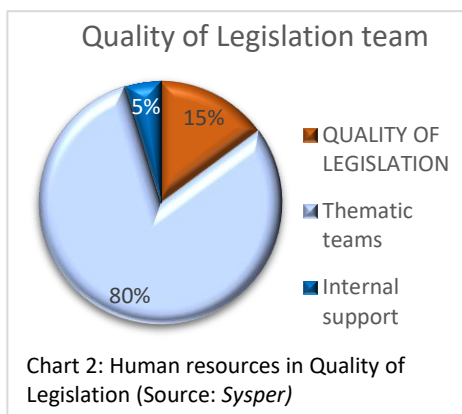
552 new consultations on infringement procedures were opened in 2025 and 553 were closed. At year end, there were 1 492 ongoing infringement procedures. Under the guidance of the respective Commissioners, the DGs continued to make significant efforts to close cases in 2025.



Graph 7 sets out more information about developments in infringement procedures during the past 5 years. More information on procedures can be found in Annex 2, Section 1.2, Table 2 and Graph B.

1.2. Quality of Legislation

The Quality of Legislation team contributes to the quality of legal acts by giving advice on their structure, drafting and to efficiency gains in the further steps of the legislative procedure by enabling more clarity, accuracy and legal consistency in the final drafts and draft proposals



which are to be translated into all language versions. The legal and linguistic advice from the Quality of Legislation team contributes to the **General objective No 8: A modern, high-performing and sustainable European Commission**. In addition, members of the team also act as linguistic agents in court cases thereby contributing significantly to the litigation function of the Legal Service, especially in languages that are not well represented in the thematic teams. As presented in Chart 2, 15% of the Legal Service's staff work in the Quality of Legislation team.

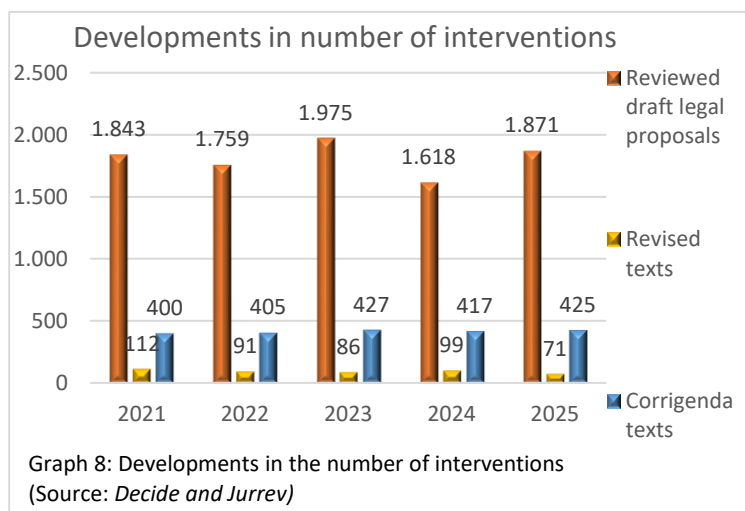
1.2.1. Revision of draft legal acts

Well-drafted legal acts enhance clarity and legal certainty, enable better and more accurate translation into all official languages of the Union and therefore contribute to efficiency and effectiveness gains in the implementation of legislation.

In 2025, the Quality of Legislation team has been solicited to give advice to Commission services on all matters of legislative drafting. The Quality of Legislation team gives advice in the conceptual phase of drafting legal acts, proactively and reactively during and after the official inter-service consultation. The selection of legal acts for revision is based on several parameters, the most important being that a text is due to become legally binding. Based on the rules of legislative drafting, the text in the legal act can be changed and reformulated, both in substance, form and structure. The advice given by the Quality of Legislation team is of value to both operational DGs and to horizontal services such as DG Translation.

After a text has been translated, but before adoption or approval by the Commission, it may be revised in all official languages by the Quality of Legislation team. The multilingual revision verifies the consistency of the linguistic versions from a legal point of view. In addition, the Quality of Legislation team revises corrigenda in all 24 Union languages.

Graph 8 shows the evolution in the number of interventions. Overall, there has been a slight increase in numbers of acts revised in 2025 in comparison to 2024. The team maintained a very high-quality output. More information is set out in Annex 2, Section 1.3, Table 4.



The Quality of Legislation team continues to maintain a list of the active *acquis* ⁽⁷⁾, identifying those acts of Union law in force which are currently applicable with a view to translation and revision needs in the context of future accessions.

1.3. Legal Representation

Defending the interests of the Commission contributes to **General objective No 8: A modern, high-performing and sustainable European Commission.**

The Director-General of the Legal Service appoints agents from among the members of the Legal Service or, in exceptional cases, external lawyers ⁽⁸⁾; who will defend the interests of the European Commission and/or the European Union before:

- the Court of Justice and the General Court of the European Union,
- national courts, both in Member States and in third countries, in cases where the Union or the Commission are parties, as an applicant or defendant,
- dispute settlement procedures under the World Trade Organisation Agreement (WTO) and other international agreements,
- the European Free Trade Association Court (EFTA Court),
- arbitration bodies,
- international courts and tribunals, such as the European Court of Human Rights, the International Court of Justice and the International Tribunal for the Law of the Sea.



The Commission may:

- act as applicant, for instance in the case of an infringement of EU law by a Member State, or to challenge an act taken by another institution,
- act as defendant, as in the case of an action for annulment of one of its acts or in the case of a failure to act,
- intervene in disputes between other parties and systematically intervenes as *amicus curiae* (friend of the court) in all preliminary ruling procedures before the European Court of Justice.

It is of vital importance that all court cases are dealt with correctly, that court deadlines are respected and that the Commission is represented at all court hearings. The Legal Service met these targets in 2025. All lawyers in the thematic teams are expected to undertake representation of the Commission in court cases and several staff members in the Quality of Legislation team also represent the Commission in court cases.

⁽⁷⁾ Established body of Union law.

⁽⁸⁾ The Director-General of the Legal Service is empowered by the College to designate the agents (i.e. lawyer(s) responsible for representing the Commission before the courts).

1.3.1. Defending the interests of the Commission and the European Union

The Legal Service has the unique responsibility of defending the Commission. Its staff have in-depth knowledge of Union law and often have previous experience as external lawyers or as



lawyers in other Commission DGs or services, in other Union institutions or in Member States' administrations. The flat organisational structure of the Legal Service enables staff to take on a high level of responsibility, which is one of the key aspects believed to contribute to the high staff satisfaction index.

Many of the cases defended by the Legal Service in courts concern large sums of money, important points of law for EU citizens or crucial points of institutional law. The performance of the Legal Service could have an impact on the reputation of the Service and of the Commission.

The Legal Service has put in place several measures to ensure quality in legal representation and coordination mechanisms to ensure the consistency of positions taken in litigation.

The Legal Service informs the President's Cabinet of judgments in sensitive cases and contributes to the public communication on judgments by working jointly with the Spokesperson's Service. The most significant judgements are mentioned in the Commission's General Report on the activities of the European Union.

1.3.2. Cases in the Courts of the Union

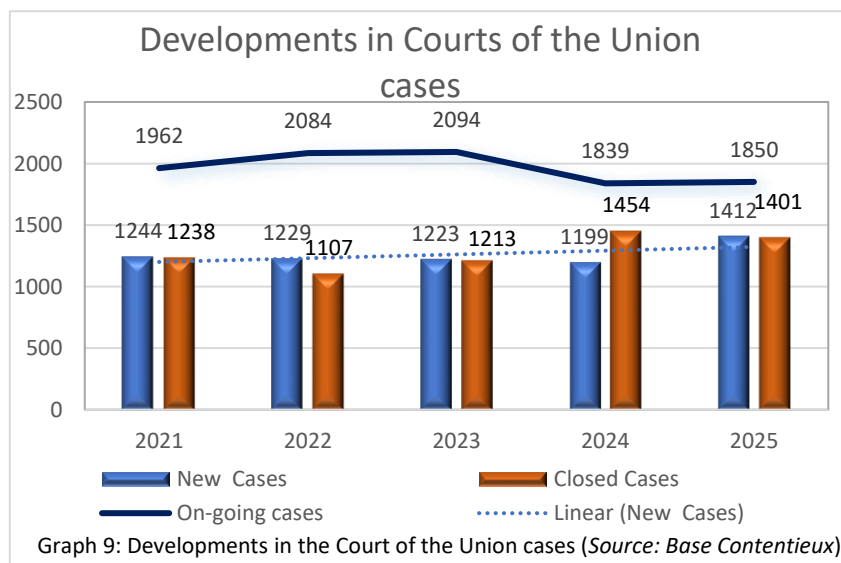
Most of the cases in which the Legal Service represents the interests of the European Commission and/or the Union take place before the Court of Justice and the General Court.

There were 1 412 new cases registered in 2025 in the Courts of the Union and 1 383 cases were closed. The

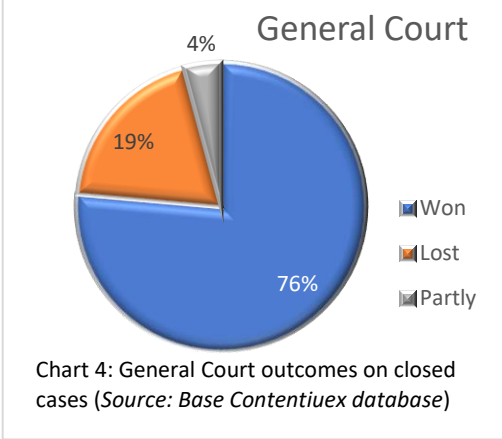
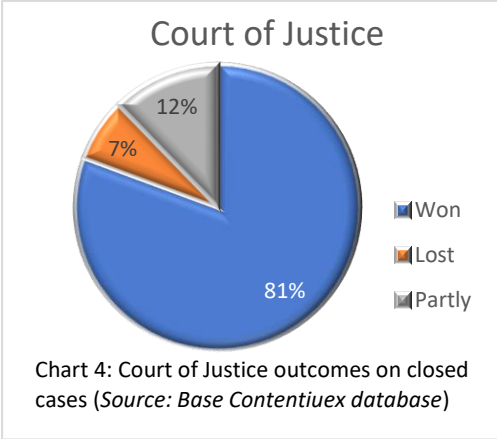
Commission was one of the parties in 1 140 of the closed cases. The trend shows a rise in new cases dealt with by the Legal Service over the past five years with an increase from 2024 to 2025 of 18%.

Graph 9 shows the developments in cases in Union courts from 2021 to 2025. Annex 2, Section

1.4, Table 5 and Graph C present more information.



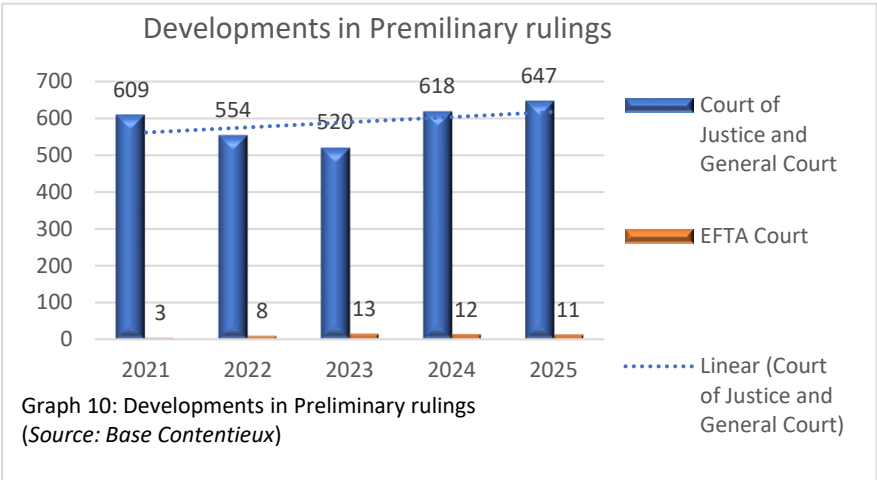
In general, the **Legal Service won in almost 80% of legal cases before the Court of Justice and the General Court.** The outcome of those court decisions is set out in Charts 4 and 5. In the case of preliminary rulings, the numbers reflect whether the Court followed the Commission’s position fully, in part or not at all. More information is presented in Annex 2, Section 1.4, Table 6.



1.3.3. Preliminary rulings

A national court may ask the Court of Justice to rule on the interpretation or validity of Union law, in so-called preliminary rulings. The Legal Service assists the Court as *amicus curiae* (friend of the court) in finding the correct interpretation of Union law, a role which is much appreciated by the Court. There is an increasing trend in the number of preliminary rulings.

As shown in graph 10, in 2025, the Legal Service assisted the Court of Justice in 647



preliminary rulings and 11 in the EFTA Court. The number of preliminary rulings has increased significantly compared to the previous year. More information is presented in Annex 2, Section 1.4, Table 6.

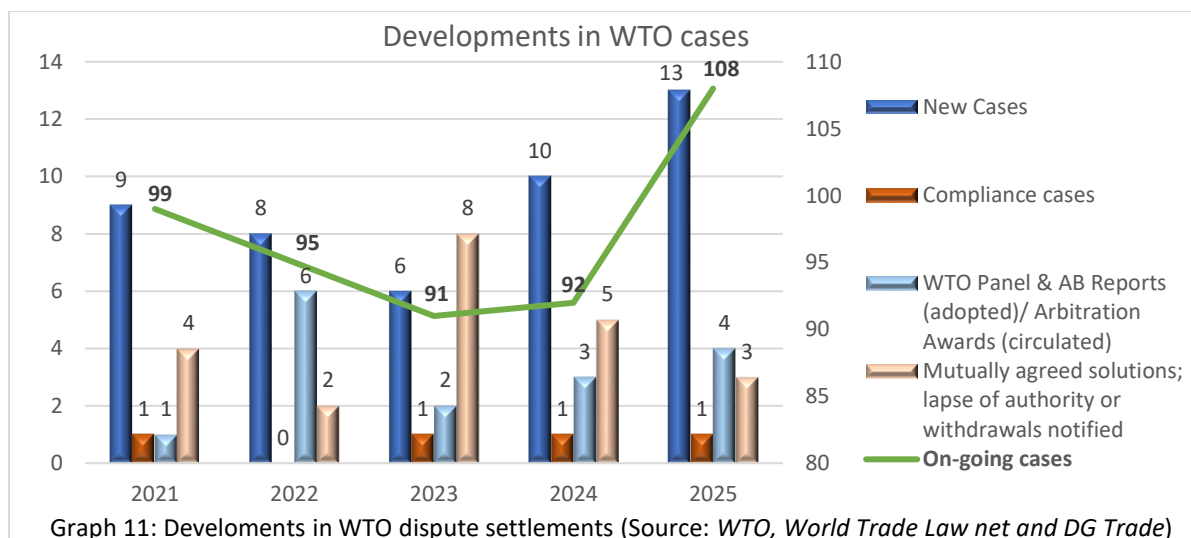
1.3.4. World Trade Organisation – WTO and Bilateral Trade Agreements

The Legal Service assists the Commission in representing the European Union in all trade negotiations and represents the European Union before WTO Panels and the WTO Appellate Body. The Legal Service also deals with the cases arising under bilateral trade agreements to which the European Union is a party.



Unless there is a mutually agreed solution, it is difficult to determine when a WTO dispute is officially considered closed (settled by the parties). WTO dispute settlement cases continue after the litigation part (implementation, reasonable period of time, retaliation) and are often considered as “not settled” even if nothing has happened for a long time, including cases where only consultations have taken place.

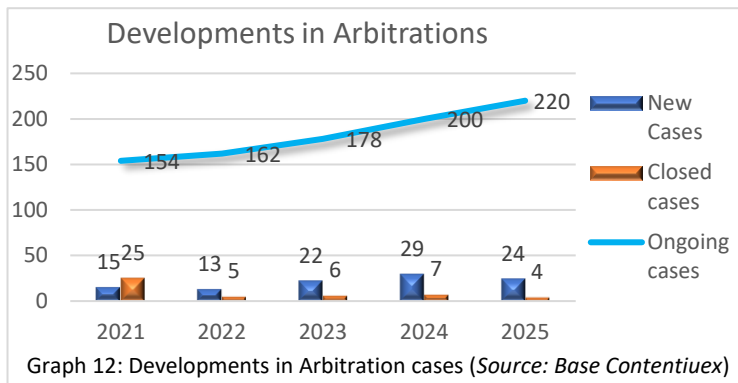
The European Union includes a dispute settlement mechanism in all its trade agreements, which allows for the rapid settlement of disputes. It is specifically designed to deal with disputes arising from the rules of the bilateral trade agreement. In 2025, there were 13 new dispute settlement cases. There were 108 ongoing cases in WTO at year end. Graph 11 below sets out the developments in WTO cases from 2020 to 2025.



The work of the Appellate Body continues to be disrupted by the United States obstructing appointments. This explains the numbers of on-going cases as shown in graph 11 above. 34 panel reports have been appealed to an Appellate Body that has no members available to hear such appeals. To circumvent this blockage, 52 WTO Members, including the European Union and its 27 Member States, have established the Multi-Party Interim Appeal Arbitration Arrangement (MPIA), based on Article 25 of the WTO Dispute Settlement Understanding, which allows for final resolution of disputes on appeal, on a reciprocal basis, following the same rules that would apply under the Appellate Body. The European Union reserves the right, under its Enforcement Regulation (Regulation (EU) No 654/2014 of the European Parliament and of the Council), to adopt countermeasures against any WTO Member who refuses to permit final resolution of panel proceedings under the terms set out in the MPIA.

1.3.5. Arbitration proceedings

The Legal Service ensures that the interests of the European Union are represented and defended in arbitration proceedings, which very often concern complex legal situations. The



number of arbitrations continues to increase. A few of the on-going arbitrations are extraordinary voluminous. Arbitration proceedings are chosen in contracts as a proceeding may be decided on faster compared to entering a legal case at the Union Courts.

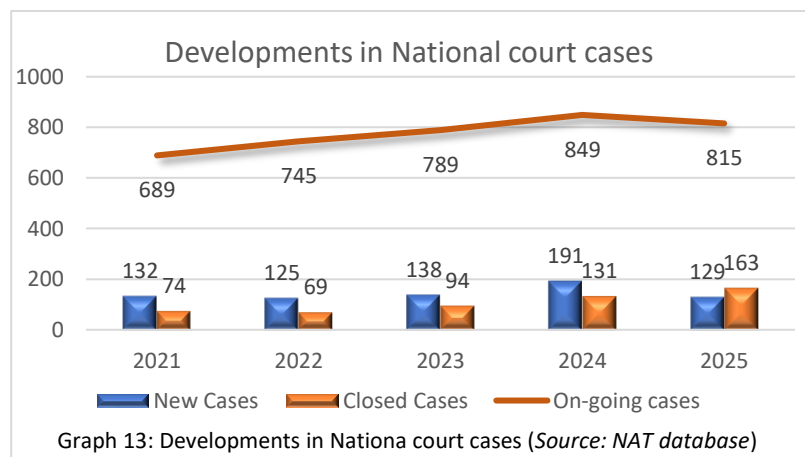
As shown in Graph 12, there were 24 new arbitration cases in 2025, and 4 cases were closed. At the end of the year, there were 220 ongoing cases. More information is presented in Annex 2, Section 1.4, Table 6.

1.3.6. National court cases

A nationally registered lawyer will be contracted when it is necessary to represent the Legal Service and the Commission before national courts. In 2025:

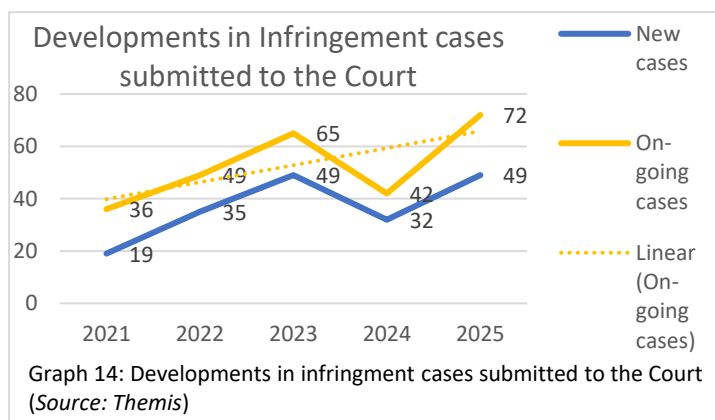
- there were 55 new cases brought before national jurisdictions, of which 36 (65%) concerned recovery of claims,
- there were 35 claims relating to liquidation/bankruptcy proceedings still open at year end,
- the Commission intervened as a civil party in 2 new criminal cases,
- unrecovered claims for an amount of EUR 5.0 million were transmitted to the Contracts and Recoveries Unit for legal action to recover these amounts,
- EUR 26.0 million, more than 10% of the total amounts transmitted for recovery, were recovered by the Unit in 2025. At year-end, 937 recovery orders for a total amount of EUR 243.8 million were still open.

At year end, there were 815 on-going cases before national jurisdictions, which is slightly above the 5-year average. There were 129 new cases and 163 were closed. 601 of the on-going cases concerned recovery of claims, i.e. 74% of the litigation cases before national courts. The 5-year evolution of national court cases is shown in Graph 13.



1.3.7. Infringement proceedings before the Court

Most infringements are resolved through dialogue with Member States and consequently only a relatively small number of infringement procedures are submitted to the Court. In 2025, 49



new cases were brought before the Court and at year-end, there were 72 on-going infringement cases. There is an increasing trend in the number of new cases referred to the Court, affecting also the number of on-going cases.

The evolution of infringement cases at the Court is presented in graph 14. Additional information is set out in Annex 2, Section 1.2, Table 3

NOTEWORTHY JUDGEMENTS PRONOUNCED BY THE COURT OF JUSTICE IN 2025

Commission v Malta (Citizenship of the Union)

The Court of Justice ruled that where a Member State grants nationality, an area of national competence, and thus automatically Union citizenship, as a result of a commercial transaction, it manifestly infringes EU law. The bond of nationality with a Member State must be based on a specific relationship of solidarity, good faith and the reciprocity of rights and duties between the State and its citizens.

Commission v Poland (Ultra vires review of the case-law of the Court)

In two judgments, the Polish Constitutional Court declared certain provisions of the Treaties, as interpreted by the Court of Justice, to be contrary to the national Constitution. After the Commission brought the matter to the Court of Justice, the Court ruled that the Polish Constitutional Court had infringed the principle of effective judicial protection and disregarded the primacy, autonomy, effectiveness and uniform application of EU law, as well as the binding effect of the Court's decisions. The Court also concluded that there had been serious irregularities vitiating the appointment of three judges of the Polish Constitutional Court and of its President, calling into question the status of that Constitutional Court as an independent and impartial tribunal established by law within the meaning of EU law.

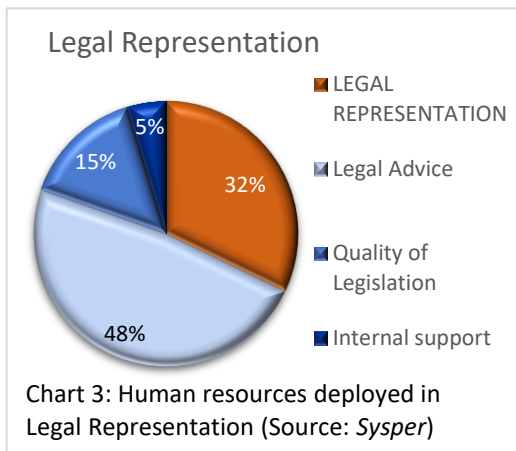
Commission v Hungary (Construction materials for critical infrastructure)

In the context of the Covid-19 pandemic, Hungary adopted a procedure laying down an obligation to notify exports of construction materials and the possibility to exercise a right of pre-emption and purchase in respect of those materials. These measures were extended to restrictions to third countries. The Court of Justice ruled that those measures had equivalent effect to quantitative restrictions, prohibited, in principle, by the principle of the free movement of goods. The Court also considered that the restrictions related to third countries had infringed the exclusive competence of the EU in the field of the common commercial policy.

Financial penalties for Member States having failed to comply with previous judgments in the area of environment

In 2025, the Court of Justice rendered four judgments pursuant to Article 260(2) TFEU against several Member States who had failed to adopt all necessary measures to comply with the Court's prior rulings. Three judgements concerned the area of waste management (Commission v Slovenia (Bukovžlak landfill); Commission v Greece (Zakynthos landfill); Commission v Croatia (Biljane Dorje landfill II). One judgement concerned the area of Urban Wastewater Treatment (Commission v Italy).

1.3.8. Human and Financial resources for legal representation



Almost one third of staff resources are deployed in legal representation. Chart 3 presents the proportion of staff working on legal representation.

Almost 90% of the Legal Service’s budget is used for litigation expenditure. In 2025, EUR 1.1 million was paid for contracted external law firms and other legal expertise, mostly in national court cases and in arbitrations. As ordered by the courts, EUR 2.0 million were payments to compensate opposing parties for their legal costs. More information presented in section 2.1.1.

Physical presence is required at court hearings, hence most mission expenditure is for legal representation. The Paymaster’s Office (PMO) paid a total amount of EUR 0.5 million for 1 224 missions in 2025, a decrease in both expenditure and number by 8% compared to 2024. More information about missions is presented in section 3.3 below.

1.4. Negotiations on accession to the European Convention on Human Rights (ECHR)

Accession of the European Union to the European Convention on Human Rights has been an objective of the European Union for many years and would be an important milestone in the



protection of human rights and fundamental freedoms across Europe. It would provide an additional layer of human rights protection for all those in Europe who are affected by the laws and decisions of the European Union. Accession of the Union to the Convention contributes to **General objective No 6: A global Europe – leveraging our powers and partnerships.**

In November 2025, the Commission requested an Opinion from the Court of Justice under Article 218(11) TFEU to confirm the revised agreement’s compatibility with the EU Treaties. The Legal Service is responsible for handling the Opinion proceedings (Opinion 1/25). A hearing is expected in 2026 and the Court’s opinion in 2027.

2. INTERNAL CONTROL AND FINANCIAL MANAGEMENT

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

2.1. Control results

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

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

The Legal Service has implemented an internal control system tailored to its characteristics and circumstances with the purpose of ensuring adequate management of the risks relating to the legality and regularity of the underlying transactions for which it is responsible, taking into account the nature of the payments, revenues, provisions and contingent liabilities concerned. The effective functioning of the Legal Service's internal control system is assessed on an ongoing basis throughout the year and is subject to a specific annual assessment covering all internal control principles.



The control system is designed to prevent, detect and correct errors, irregularities and fraud by ex-ante and ex-post controls covering all types of financial operations and procurement. Furthermore, it ⁽⁹⁾ supports sound management and decision-making and ensures that risks to the achievement of objectives are taken into account and reduced to acceptable levels through cost-effective controls.

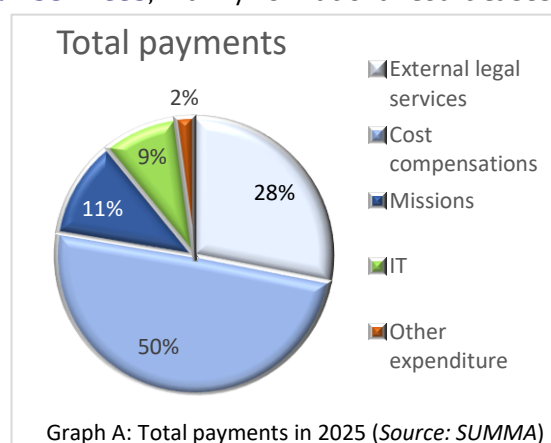
⁽⁹⁾ [Communication C\(2017\)2373 - Revision of the Internal Control Framework](#)

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

As a modern public administration, the Legal Service implements an internal control framework inspired by the highest international standards. It covers all the principles of internal control, tailored to the particular characteristics and circumstances of the Legal Service.

a) Administrative expenditure

In 2025, EUR 1.1 million was paid for **external legal services**, mainly for national court cases for which only a qualified national lawyer may plead, or when expert knowledge or a particular language skill is required. The Legal Service concludes contracts with external lawyers or other legal experts based on a negotiated procedure ⁽¹⁰⁾ with minimum one candidate. In 2025, the Legal Service made 445 payments for an average amount of EUR 2 400. 94% of contracts and amendments signed in 2025 were for amounts of below EUR 15 000.



No prior contractual obligation exists when the court decides that the Commission should **compensate an opposing party for their legal costs**, partly or fully. In 2025, payments to compensate opposing parties for their legal costs increased by EUR 0,4 million to EUR 2.0 million.

Type of expenditure	Million EUR
Legal Fees	1.1
Compensation to opposing parties for their legal costs	2.0
Mission expenditure (co-delegated from PMO)	0.5
IT expenditure, including co-delegated budget from DIGIT	0.4
Other expenditure	0.1
TOTAL EXPENDITURE	4.0

Table 1: Expenditure per category (Source: SUMMA)

The Payment Office (PMO) pays for the missions undertaken by staff in the Legal Service. More information on the mission expenditure is presented in section 3.3. IT expenditure decreased in 2025 by EUR 0.1 million to EUR 0.4 million, see section 3.2 for more details. Annexes 5 and 6 provide information on the materiality criteria and the relevant control systems.

⁽¹⁰⁾ Within the meaning of point 11.1.h of Annex I, section 2, to the Financial Regulation

b) Revenue

Certain court decisions will allow the Legal Service to **recover expenditure for external legal fees and mission expenditure from opposing parties**, which are recorded as Recovery Orders. The fees relating to the Service Level Agreements for the use of the Unified Litigation Management tool offered to other EU bodies is also recorded as Recovery orders, more information presented in section 3.2.

Revenue	Million EUR
Recovery of expenditure for legal fees and mission costs from opposing parties and Service Level agreements fees	0.1

Table 2: Revenue per category (Source: SUMMA)

c) Receivables

In 2025, the Legal Service claimed a total amount of EUR 0.1 million and received payments of EUR 0.1 million from outstanding claims. At year-end, unpaid claims amounted to EUR 0.5 million. The Commission dunning procedure is followed. A significant part of outstanding claims is recovered by salary or pension deductions. Provisions for dubious claims are recorded at Commission level.

Recovery Order receivables	Million EUR
Cost compensation from opposing parties and Service Level agreements	0.1

Table 3: Revenue per category (Source: SUMMA)

d) Provisions and Contingent liabilities

Opposing parties may claim cost compensation from the Legal Service for their legal costs. The claims are recorded partly as a provision and partly as contingent liabilities provision. The split is based on both individual assessments and historical figures by comparisons between the provisions and the actual payments made. Ex-ante controls are put in place to ensure that provisions for opposing parties' costs compensations are complete. Yearly assessments are made to determine accuracy of the split between provisions and contingent liabilities.

Cost compensation for opposing parties	Million EUR	Cost compensation for opposing parties	Million EUR
Provision	7.8	Contingent Liability	34.4

Table 4: Provisions and Contingent liabilities per category (Source: SUMMA)

2.1.2. Effectiveness of controls

a) Assessment of control results per segment of expenditure

The Legal Service has put in place controls in its procedures. All contracts and invoices undergo ex-ante controls, firstly by the financial cell, thereafter by the agent in charge of the court case (“*verified correct*”) and lastly by the AOSD’s ⁽¹¹⁾ approval (“*good for payment*”). Revenue controls are performed ex ante. All AOSDs perform ex-post controls of both expenditure and revenue before issuing a declaration of assurance.

The Internal Control Officer (ICO) carries out ex-post controls by analytical reviews and review of transaction sample checks performed by the financial cell. The Head of Unit (SJ.R.1) and the Director for Risk Management and Internal Control (RMIC) may request additional information and may carry out additional controls.

The controls in place have proven to be efficient and very few erroneous payments have been discovered ⁽¹²⁾. The non-compliance rate ⁽¹³⁾ in the procurement procedure for 2025 is below 0.5%. Late approval of mission requests, all assessed to be operationally justified, resulted in a non-compliance rate at 2.0%.

For 2025, the ICO concluded that: revenue and expenditures were justified, both operationally and financially; no exceptions were reported and no serious breaches were discovered. Based on this information, the Legal Service estimated its risk of errors in each Relevant Control System (RCS) to be low, i.e. <0.5%. Further information on each RCS can be found in Annex 6.

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

The estimated overall risk at payment for 2025 expenditure is the AOD’s best conservative estimate of the amount of relevant expenditure during the year that is not in conformity with the contractual and regulatory provisions applicable at the time the payment was made. A proportion of the underlying errors will be corrected in subsequent years and until the end of the programming cycle, corresponding to the conservatively estimated future corrections for 2025 expenditure. The difference between the risk at payment and the estimated future corrections results in the estimated overall risk at closure ⁽¹⁴⁾.

⁽¹¹⁾ The Director General delegates financial responsibilities to Authorised Officer by Delegation, AOSD

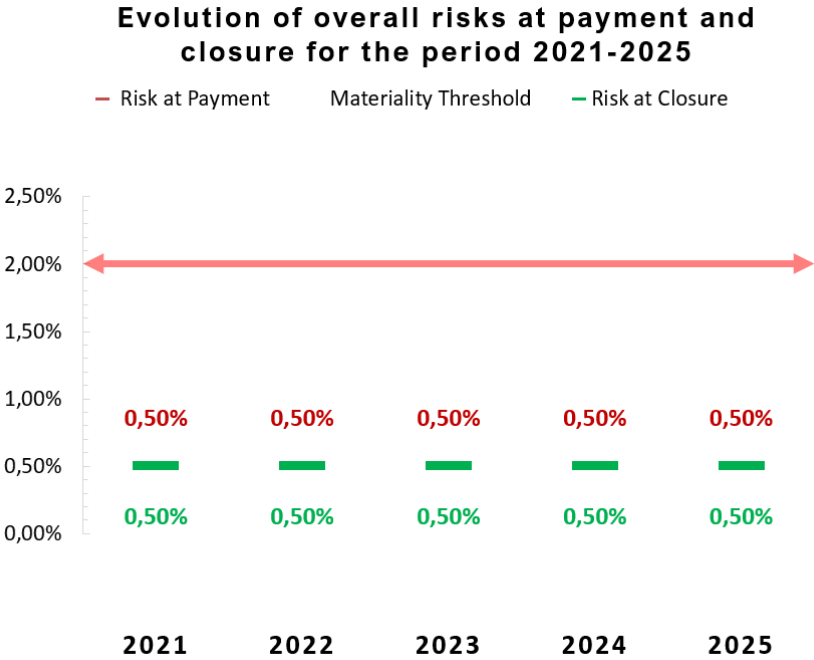
⁽¹²⁾ Two non-compliance events were identified in 2025 relating to late signatures in amendments to contracts at total amount of EUR 12 700, for which the services provided were justified. Over the past 7 years, two incorrect payments of a total of EUR 2 875 were discovered ex post. Both amounts have been recovered.

⁽¹³⁾ Number of events compared to total number of transactions.

⁽¹⁴⁾ This is the AOD’s best, conservative estimation of the expenditure authorised during the year that would remain not in conformity of applicable regulatory and contractual provisions.

There is a stable trend since 2021 mainly due to the low error rate in payments. The Legal Service is using the Commission's flat rate of 0.5% as a conservative estimate for low-risk type of expenditure.

For an overview at Commission level, the departments' estimated overall risk at payment, estimated future corrections and risk at closure are consolidated in the AMPR.



c) Quantitative benefits of controls: Preventive and corrective measures

The Legal Service continued to perform ex-ante and ex post controls as an effective mechanism for detecting and correcting errors. In 2025, due to the transition to SUMMA, only preventive measures exceeding EUR 500,000 are reported. There were no irregular payments detected in 2025 and hence no corrections were made. The historically low figures on future corrections are expected to apply also to the financial year 2025. More details can be found in annex 3 and 7.

d) Assessment of control results for non-expenditure items

The Legal Service deals with sensitive information, both classified and non-classified and has implemented internal procedures, a supporting informatics structure and issued guidelines to staff on how to handle sensitive information from receipt to destruction. A working group meets regularly to assess any reported breaches; none were reported in 2025. All staff are requested to confirm their ethics awareness annually and are also reminded of the importance of the rules and procedures in place in the Legal Service and in the Commission for the handling of sensitive information.

e) Fraud: prevention, detection, and correction

The Legal Service has developed and implemented its own anti-fraud strategy since 2013, based on the methodology provided by OLAF. It is updated every three years and was last updated in April 2024 following a fraud risk assessment. Its implementation is being monitored and reported to the management biannually. All necessary actions have been implemented.

As co-lead service for action 30a of the Commission Anti-Fraud Strategy Action Plan of July 2023, the Legal Service has replied to all legal questions issued regarding the cooperation with the European Public Prosecution office (EPPO).

There are no corrective measures based on OLAF recommendations reported on in the context of annual monitoring exercises conducted by OLAF, in accordance with Article 11 of Regulation 883/2013 ⁽¹⁵⁾.

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

2.1.3. Efficiency of controls

The transition in 2025 to the Commission's new accounting system, SUMMA, has required the adjustment to a new system and has impacted budget implementation tasks, processes and financial management activities, particularly during the first part of the year. This has required careful management to ensure the same data quality as in previous years. In some cases, this may have resulted in lower performance for some standard financial indicators such as timely payments (see Annex 4).

An increased effort to send reminders, using an internal register of invoices sent for approval has contributed to an increase in the rate for timely payments to be 97% in 2025 compared to 95% in 2024. The Legal Service does not have any programmes, therefore indicators for time-to-inform and time-to-grant do not exist.

After verifying that contracted legal services have been provided and reached expected results, payments are made. The implemented financial and internal control procedures comply with baseline requirements and have proven to be efficient. No material errors have been identified in the past few years. Based on the available information, the Legal Service has reasonable assurance that the payment procedure has efficient controls.

⁽¹⁵⁾ REGULATION (EU, EURATOM) No 883/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999

2.1.4. Economy of controls

The Legal Service quantifies the costs of the resources required for carrying out the controls described in Annex 7 and estimates, as far as possible, their benefits in terms of the number of errors and irregularities prevented, detected and corrected by these controls. The controls implemented in the financial procedures comply with baseline requirements of the Financial Regulation. Cost of controls has remained stable at EUR 0.3 million over the years. In 2025, total expenditure decreased in 2025, hence, cost of controls increased to 9.6%. Contracts and payments are for low amounts, consequently cost of controls are relatively high. More information about the calculation of total cost of controls is set out in Annex 7, Table Y.

2.1.5. Conclusion on the cost-effectiveness of controls

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

2.2. Audit observations and recommendations

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

There were no audit reports issued in 2025 by either the Internal Audit Service, or by the European Court of Auditors to the Legal Service and there are no outstanding critical or very important audit recommendations from previous years' audits.

2.3. Assessment of the effectiveness of internal control systems

The Commission has adopted an Internal Control Framework based on the highest international standards ⁽¹⁶⁾.

The Legal Service has adapted the Internal Control Framework to its specific characteristics and organisational structure. The internal control systems are suited to achieving its policy and internal control objectives in accordance with the internal control principles, having due regard to the risks associated with the environment in which it operates. The process by which management assessed the effectiveness of the internal control system is described in Annex 8.

The Legal Service has assessed its internal control system during the reporting year and has concluded that it is effective and the components and principles are present and functioning as intended.

2.4. Conclusions on the assurance

The information reported in section 2 stems from the results of management and auditor monitoring contained in the reports listed. These reports result from a systematic analysis of the evidence available. This approach provides sufficient guarantees as to the completeness and reliability of the information reported and results in a comprehensive coverage of the budget delegated to the Director-General of the Legal Service.

The full centralised financial circuit, the internal control function, the reporting of non-compliance events, the low number of actual errors and the low number of estimated risk of errors, the actions taken on fraud prevention and the financial indicators, all provide support to conclude that the Annual Activity Report of the Legal Service presents a true and fair view, that resources are used for their intended purposes, that sound financial management is applied as well as the legality and regularity of transactions, that information is safeguarded and that there is no omission of significant information. No internal control weaknesses were identified.

In conclusion, based on the elements reported above, management has reasonable assurance that, overall, effective controls are in place and working as intended; risks are being appropriately monitored and mitigated; and necessary improvements and reinforcements are being implemented. The Director-General, in his capacity as Authorising Officer by Delegation has signed the Declaration of Assurance.

⁽¹⁶⁾ The Committee of Sponsoring Organizations of the Treadway Commission Internal Control Integrated Framework, the golden standard for internal control systems.

2.5. Declaration of Assurance

Declaration of Assurance

I, the undersigned,

Director-General of the Legal Service

In my capacity as authorising officer by delegation, declare that the information contained in this report gives a true and fair view ⁽¹⁷⁾.

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

This reasonable assurance is based on my own judgement and on the information at my disposal, such as the results of the self-assessment, and ex-post controls.

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

Brussels on March 31, 2026

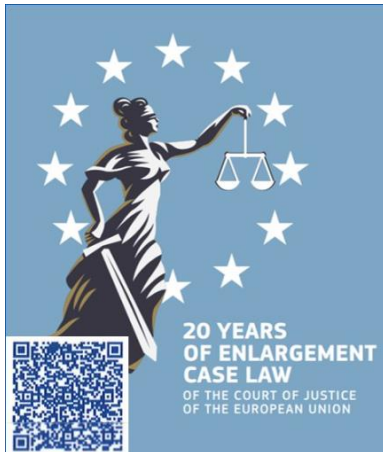
(electronic signature)

Alberto DE GREGORIO MERINO

⁽¹⁷⁾ True and fair in this context means a reliable, complete and correct view on the state of affairs in the Legal Service.

3. A MODERN AND SUSTAINABLE PUBLIC ADMINISTRATION

The third **Annual Conference** organised by the Legal Service took place on April 4, 2025, with the participation of several distinguished speakers on **International Sanctions**, particularly in the context of the aggression of Ukraine by Russia, and



the relations between **EU law and Arbitration**.

There was a significant interest by some 500 subscribed participants at the event and another 600 subscribed to follow the conference online.



In May 2025, the Legal Service published the book: **20 Years of Enlargement Case Law of the Court of Justice of the European Union**.

3.1. Human resource management

The **new staff engagement index in the Legal Service reached 84%, one of the highest scores in the Commission**, in the 2025 Staff Survey. The 2023 index for staff engagement shows an increase from 76% to 79%. **Staff satisfaction with management went up considerably**, on different criteria, and scores **well above the average in the Commission**.

In the Legal Service, 89% of staff feel a sense of pride in doing their job and 90% of staff like their job content and tasks, and also the same percentage confirm that they know what is expected from them at work. **A major increase in satisfaction** of 12 points was provided for the **identification of learning and development needs and the development possibilities** of staff, an indication that the training strategy of the Legal Service is well implemented. Scores went up on the question about fair and equal treatment irrespective of gender, sexual orientation, ethnic background, etc (71% vs 60% in 2023) and if staff themselves feel treated fairly (81 % vs 77% in 2023).

As an **indication of workload**, the survey shows that colleagues in the Legal Service, **54% of staff find** that they **have an acceptable workload** and that they have a good **balance between their work life and private life**. This is an indicator that needs attention.

The ratio of females in middle management is currently still at 40%.

The annual **internal mobility** exercise was continued, with a **rotation of 27 lawyers** moving between the different thematic legal teams in 2025. The Legal Service also redeployed staff to priorities. The mobility also offered **improved professional development** possibilities for

staff. The internal training activities were continued and expanded in line with the Training strategy of the Legal Service.

In 2025, **management continued to put focus on: resilience and well-being at work in the Legal Service**, increasing the flexibility of work allocation and inter-team support, on developing and codifying methods and best practices. With the purpose of **improving legislative drafting** in the Commission DGs and Services, the Legal Service provided training in legislative drafting and undertook information campaigns to improve awareness of the guidance on **How to consult the Legal Service**.

The workload assessment was finalised in 2025. It was based on 9 recommendations that will be followed up. It dealt with fostering cooperation and flexibility (encouraging resource-sharing within and across Legal teams), strategic resource allocation (improved attribution of resources based on needs and political priorities), evolve working practices (collaborate even more closely with client DGs), streamline consultations (optimise internal organisation processes), enhance training/guidance (improve incoming legal quality of DGs and manage workload), set clear priorities and manage talent, consider alternative staffing possibilities, and the allocation of agents for court cases.

3.2. Digital transformation and data management

Digital transformation and Cyber security

To foster **a digital culture**, corporate training and use of MS Teams/M365 has been further promoted and staff have been systematically offered training courses on **Legal Tech** tools. 14% of statutory staff completed **at least one IT training course** in 2025, a decrease from 26% compared to 2024.

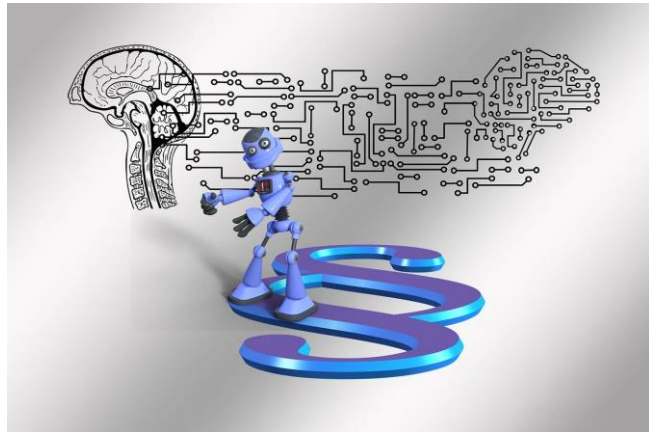
Relying on the corporate **green, secure and resilient infrastructure** in 2025, 17% **of IT systems utilising cloud infrastructure services** compared to the total number of IT systems, which is above the 10% target set for the year.

As a support service, the Legal Service is not directly involved in **digital-ready policymaking**. When it comes to policy enforcement, its **ULM** flagship system (Unified Litigation Management) has become a **reference litigation management solution** for European Union Bodies, Institutions and Agencies' (EUIBA) facing court procedures with several SaaS (Software as a Service) agreements secured.

In a push towards a **seamless digital environment**, the integration of **UML** with the accounting system, **SUMMA**, and the legislative drafting system, **EdiT**, was finalised in 2025.

The development of the Legal Service's **innovative medium sized portfolio of Legal Tech systems**, under the umbrella brand **ULM** also continued in 2025, **integrating corporate IT solutions** in its **business-driven digital transformation**.

The **Artificial Intelligence Strategy** of the Legal Service, integration of conversational and generative AI capacities in **ULM Legal Tech** tools advanced in 2025 with the release in pilot mode of 3 AI powered advanced features. The Legal Service processes and content, complement the corporate tooling and stayed aligned with the corporate AI strategy and made good use of the corresponding available corporate AI tooling.



Data Management

Beyond the massively consumed public or corporate data and documents for which the Legal Service acts as a legal stakeholder, the data owned specifically by the Legal Service is limited, of a private nature and **has to be secured**. It is managed and controlled locally, focused on business needs, e.g. litigation proceedings or revision workflows. In the same way, interoperability and accessibility are enforced at local level through the implementation of a common data layer across the ULM components.

There is currently no plan to share it with other services beyond the strict **need-to-know** requirements, or to store it on public clouds. The data maturity level is estimated as developing and has remained stable in 2025. Through the systematic review of security plans, the **awareness of data owners** is raised.

Data Protection

Appropriate technical and organisational measures are in place to ensure the accountability for compliance with the data protection rules and an appropriate level of security in conformity with Objective 1 of the **Commission Data Protection Action Plan** (DCP). Information on available data protection training is shared by the DPC (Objective 2). Records of processing operations under the Legal Service's responsibility and privacy statements are reviewed and updated (Objective 3 and Objective 4). The DPC regularly participates in meetings with the DPO. The **percentage of staff trained on data protection compliance combined with the percentage of public records of processing operations reviewed within the last two years was maintained (100% in 2025)**.

3.3. Sound environmental management

85% of the Legal Service's missions are mandatory as physical presence is required at hearings in Union Courts, in national courts, in certain international negotiations such as in the WTO and the Director-General is always expected to be present when the Commission meets, in Strasbourg or elsewhere.

The Legal Service reduced its emissions on staffs' professional travelling by 26%, which exceeded the target for 2025 set at 20%.

It also met the target set for 2025 that 90 % of its mission travel undertaken should be by train or in a shared vehicle, hence complying with the Commission's greening initiatives.

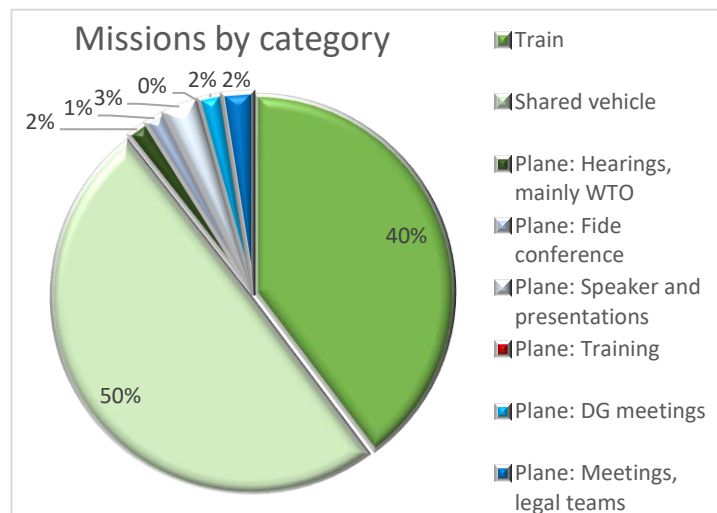
10% of all missions in 2025 were by plane, which is a 17% decrease compared to 2024. Chart 6 below presents more details of the different categories of mission travel.

- 2% of missions by plane were for hearings mainly at the World Trade Organisation (WTO) in Geneva,

- 2% of missions by plane were undertaken by the Director-General for meetings and presentations,

- 2% of missions by plane were undertaken by staff in the legal teams to participate in meetings,

- 3% were missions by plane for participation in the biannual FIDE conference, and



- 1% of meetings by plane were to training courses or to speak at conferences or to make other presentations, of which 80% were paid for, within the applicable rules, by the organisers or by the colleagues of the Legal Services. Hence this incurred no additional mission expenditure by the Legal Service.

Based on the Commission model for calculation of the CO₂ impact for mission travel, it decreased from 128.5t CO₂ in 2024 to 95.3t CO₂ in 2025, mainly explained by a 17% decrease in missions by plane.