European Commission

Annual Activity Report 2025

annexes

Directorate-General for

Trade and Economic Security

Contents

ANNEX 1: Statement of the Director in charge of Risk Management and Internal Control 3

ANNEX 2: Performance tables 4

ANNEX 3: Draft annual accounts and financial reports 31

ANNEX 4: Financial scorecard 32

ANNEX 5: Materiality criteria 33

ANNEX 6: Relevant Control System(s) for budget implementation (RCSs) 34

ANNEX 7: Specific annexes related to "financial management" 40

ANNEX 8: Reporting on the internal and external audits and assessing the effectiveness of internal control systems 44

ANNEX 9: Specific annexes related to "Control results" and “Assurance: Reservations” 48

ANNEX 10: Reporting – Human resources, digital transformation and data management, and sound environmental management 50

ANNEX 11: Implementation through non-EU entrusted entities and/or through EU Trust Funds 58

ANNEX 12: EAMR of the Union Delegations 66

ANNEX 13: Decentralised agencies and other Union bodies 67

ANNEX 1: Statement of the Director in charge of Risk Management and Internal Control

I declare that in accordance with the Commission's communication on the internal control framework ([1]), I have reported my advice and recommendations on the overall state of internal control in the DG to the Director-General.

I hereby certify that the information provided in the present annual activity report and in its annexes is, to the best of my knowledge, accurate and complete.

Brussels, 16 April 2026

(e-signed)

Sofía MUÑOZ ALBARRÁN

([1]) C(2017)2373 of 19.04.2017.

ANNEX 2: Performance tables

General objective 1: A new plan for Europe's sustainable prosperity and competitiveness; 6. A global Europe - leveraging our power and partnerships	
Specific Objective 1.1 (6.1): The EU's competitiveness, security and sustainability objectives are reinforced by a broad range of trade and investment partnerships	
Result indicator 1.1.1 (6.1.1): Number of on-going (2) EU trade and investment negotiations, number of applied (3) EU trade and investment agreements and other types of agreements **Explanation: This indicator will show the extent of the EU's negotiating agenda in terms of its potential to cover the world's trade, and how it evolves. The broader the agenda, the wider the potential coverage. It also shows the extent of the world's trade covered by EU's applied preferential trade and investment agreements and the evolution of this coverage.** **Source of data: DG TRADE**	
Applied EU trade agreements	
Baseline (2024)	76 trade agreements: Albania, Algeria, Andorra, Antigua and Barbuda, Bahamas, Barbados, Belize, Bosnia-Herzegovina, Botswana, Cameroon, Canada, Chile, Colombia, Comoros, Costa Rica, Dominica, Dominican Republic, Ecuador, Egypt, El Salvador, Eswatini, Faroe Islands, Fiji, Georgia, Ghana, Grenada, Guatemala, Guyana, Honduras, Iceland, Israel, Ivory Coast, Jamaica, Japan, Jordan, Kenya, Kosovo, Lebanon, Lesotho, Liechtenstein, Madagascar, Mauritius, Mexico (4), Moldova, Montenegro, Morocco, Mozambique, Namibia, New Zealand, Nicaragua, North Macedonia, Norway, Occupied Palestinian Territory, Panama, Papua New Guinea, Peru, Samoa, San Marino, Serbia, Seychelles, Singapore, Solomon Islands, South Africa, South Korea, St Kitts and Nevis, St Lucia, St Vincent, Surinam, Switzerland, Trinidad and Tobago, Tunisia, Türkiye, Ukraine, United Kingdom, Viet Nam and Zimbabwe.
Interim milestone (2027)	Addition of new trade agreements: Mercosur (Argentina, Brazil, Paraguay and Uruguay), Mexico (5), India, Indonesia, Thailand, Philippines, Niue, Tonga, Tuvalu, Vanuatu, Eastern and Southern Africa (ESA5: Comoros, Madagascar, Mauritius the Seychelles and Zimbabwe), Kyrgyz Republic and the United Arab Emirates.
Target (2029)	Addition of new trade agreements: Cook Islands, Kiribati, Marshall Islands, Micronesia and Timor Leste.
Latest known result (2025)	In 2025, negotiations were concluded with Indonesia and Mexico, and significant progress was made towards the conclusion of the India negotiations and the signature of the Mercosur agreement.

(2) "On-going trade and investment negotiations" are here identified as negotiations from the point of launch of negotiations to provisional application of the agreement.
(3) This refers to agreements that have been provisionally applied (awaiting ratification) and agreements that have entered into force
(4) EU-Mexico Global Agreement from 2000
(5) EU-Mexico modernised Global Agreement concluded in 2025

Other types of agreements	
Baseline (2024)	Angola (SIFA), Japan (data flows).
Interim milestone (2027)	South Africa (CTIP), Singapore (Digital Trade Agreement), South Korea (Digital Trade Agreement), Ecuador (SIFA), Côte d'Ivoire (SIFA).
Target (2029)	([6])
Latest known result (2025)	In 2025, a CTIP was concluded with South Africa and a Digital Trade Agreement was concluded with Singapore.

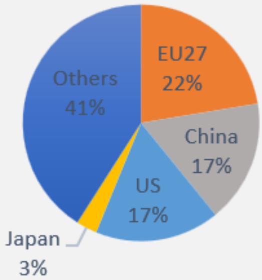
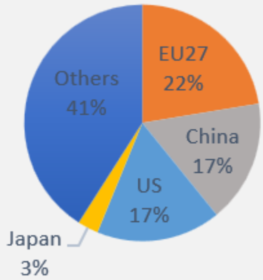
Result indicator 1.1.2 (6.1.2): Percentage of trade covered by applied bi-lateral and regional agreements
Explanation: This indicator will show the extent of the EU trade covered by EU's applied preferential trade agreements and the evolution of this coverage.
Source of data: Eurostat ([7])
This result indicator is selected as a KPI

Baseline Goods (2024) and services 2023 FTA status 31/12/2024			**Interim milestone** (2027)			**Target** (2029)			**Latest known results** (Goods and services 2024) FTA status 31/12/2025		
Goods											
Imp.	**Exports**	**Total**	**Imp.**	**Exports**	**Total**	**Imp.**	**Exports**	**Total**	**Imp.**	**Exports**	**Total**
41.9%	50.0%	46.1%	49.8%	57.1%	53.6%	53.6%	61.6%	57.7%	41.7%	50.0%	46.0%
Services											
Imp.	**Exports**	**Total**	**Imp.**	**Exports**	**Total**	**Imps.**	**Exports**	**Total**	**Imp.**	**Exports**	**Total**
44.1%	51.9%	48.2%	50.2%	58.6%	54.6%	52.1%	62.9%	57.8%	46.8%	54.4%	50.8%

([6]) No targets can be included because DG TRADE would need the political endorsement before launching any new trade negotiation agreement.

([7]) Eurostat trade in goods: [ds-045409] EU trade since 1988 by HS2-4-6 and CN8
Eurostat trade in services: [bop_its6_tot] Total services, detailed geographical breakdown by EU Member States (since 2010) (BPM6)

Result indicator 1.1.3 (6.1.3): EU share in imports of partner countries with which the EU has a preferential trade agreement in force
Explanation: This indicator will demonstrate the effects of preferential access to export markets stemming from the preferential agreements. The deeper the liberalisation and the more effective its implementation, the stronger the anticipated EU's competitive position compared to other partners on the export market. This indicator may also be helpful in assessing comparative effectiveness of EU's and other partners' preferential instruments compared to selected markets
Source of data: IMF IMTS data

Baseline (Trade in goods 2023)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (2024)
 	Maintain EU share	Maintain EU share	

Result indicator 1.1.4 (6.1.4): Share of EU in world trade in goods and services as well as investment
Explanation: This indicator shows to what extent the EU manages to maintain its prominent position in world trade despite the rise of the new trade powers.
Source of data: IMF for goods, WTO for services, UNCTAD for investments (including intra-EU27 stocks)

Baseline Goods 2024 Services 2023 Investments 2023	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** Goods 2024 Services 2024 Investments 2024
Goods			
Imports: 12.7% Exports: 13.6% Total: 13.2%	Maintain	Maintain	Imports: 12.9% Exports:14.0% Total:13.4%
Services			
Imports: 22.2% Exports: 23.4% Total: 22.8%	Maintain	Maintain	Imports: 22.3% Exports:23.3% Total:22.8%
FDI stocks			
Inward: 25.4% Outward: 32.7%	Maintain	Maintain	Inward:22.5% Outward:30.6%

Result indicator 1.1.5 (6.1.5): EU trade openness Explanation: Trade openness is necessary for the EU firms to remain globally competitive. Exporting firms are more productive than other firms and support millions of jobs across the EU, while through imports, the EU taps into others countries' resources, production of new and/or cheaper intermediate- and final goods and services, ideas and technologies, etc. Openness to foreign direct investment also brings economic growth, job creation and integration in global value chains, which is why EU countries seek to improve conditions to attract investors Source of data: Eurostat.			
Baseline	**Interim milestone** (2027)	**Target** (2029)	**Latest known results**
2023: 44.2 % 2024: 43.3 %	> baseline	> Interim milestone	2025 not available

Main outputs in 2025:

New policy initiatives

Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Proposal for a Regulation of the European Parliament and of the Council to amend Regulation (EU) 2024/823 of 28 February 2024 on exceptional trade measures for countries and territories participating in or linked to the Stabilisation and Association Process	Adoption by the Commission	Q2 2025	Adopted 14 May 2025 COM(2025)229
Proposal for a Regulation of the European Parliament and of the Council on the modification of customs duties applicable to imports of certain goods originating in or exported directly or indirectly from the Russian Federation and the Republic of Belarus	Adoption by the Commission	Q1 2025	Adopted 28 January 2025 COM(2025) 34 final
Proposal for a Council Decision on the position to be taken on behalf of the European Union in the Trade Committee established by the Free Trade Agreement between the European Union and New Zealand, as regards amendments to that Agreement concerning fundamental principles and rights at work	Adoption by the Commission	Q2 2025	Adopted 25 April 2025 COM(2025)183 Council Decision adopted on 27 May 2025 (2025/1121)

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Proposal for a Council Decision on the accession of Vanuatu to the Interim Economic Partnership Agreement between the European Community, of the one part, and the Pacific States, of the other part	Adoption by the Council EP consent Adoption by the Commission	 Q1 2025	Adopted 10 October 2025 Council Decision (EU) 2025/2141 10 September 2025 Adopted 13 March 2025 COM(2025)105
Commission proposals for Council decisions on signature and conclusion of the modernised EU-Mexico agreement	Adoption by the Commission	Q3 2025	Adopted 3 September 2025 COM(2025)811 and COM(2025)812
Commission proposal for Council decisions on signature and conclusion of the modernised EU-MERCOSUR agreement	Adoption by the Commission	Q2 2025	Adopted 3 September 2025 COM(2025)338 and COM(2025)339
Recommendation for a Council Decision authorising the opening of negotiations of a Sustainable Investment Facilitation Agreement between the European Union and the Republic of Côte d'Ivoire	Adoption by the Commission	Q2 2025	Adopted 6 May 2025 COM(2025)192
Recommendation for a Council Decision authorising the opening of negotiations of a Sustainable Investment Facilitation Agreement between the European Union and the Republic of Ecuador	Adoption by the Commission	Q3 2025	Adopted 29 July 2025 COM/2025/427 final
Commission decision as regard the Notice pursuant to Article 6(6) of Protocol II to the Interim Partnership Agreement between the European Community, of the one part, and the Pacific States, of the other part.	Adoption by the Commission	Q3 2025	Adopted 29 July 2025 C(2025)5071 Endorsed by Pacific side at 11th EU-Pacific Joint EPA Committee on 29-30 January 2026.
Commission proposal for a Regulation implementing the bilateral safeguard clause of the EU-Mercosur Partnership Agreement and the EU-Mercosur Interim Trade Agreement for agricultural product	Adoption by the Commission	Q4 2025	Adopted 8 October 2025 COM(2025) 639 final

Other major outputs			
Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Proposal for a Council Decision on the conclusion and signing of the European Union – Republic of Korea digital trade agreement	Adoption by the Commission	Q3 2025	Adopted 10 September 2025 COM(2025)478 and COM(2025)479
Proposal for a Council Decision on the accession of Timor-Leste to the Interim Economic Partnership Agreement between the European Community, of the one part, and the Pacific States, of the other part	Adoption by the Commission	Q4 2025	Q2 2027 Pending Market Access Offer from Timor Leste due to parallel accession processes to EPA, WTO and ASEAN.
Commission Implementing decision on recognition of equivalence of a notified supply chain due diligence scheme under Article 8 of Regulation (EU) 2017/821	Adoption by the Commission	Q4 2025	Adopted 16 October 2025 C(2025)6853
Proposal for a Council Decision on the signing and conclusion of the European Union – Singapore digital trade agreement	Adoption by the Commission	Q1 2025	Adopted 31 January 2025 C(2025)23 and C(2025)22 Council decision adopted 14 April 2025 (2025/798)
Proposal for a Regulation of the European Parliament and of the Council on applying a generalised scheme of tariff preferences and repealing Regulation (EU) No 978/2012 of the European Parliament and of the Council	Adoption by the Commission progress/adoption by the co-legislators		COM(2021)579 final Agreement on way forward at political trilogue of 1 December 2025. The technical work to finalize the text will be concluded in Q2 2026.
Proposal for a Council Decision on the position to be taken on behalf of the European Union within the Committee on Investment Facilitation established by the Sustainable Investment Facilitation Agreement between the European Union and the Republic of Angola regarding the adoption of the Rules of Procedure of the Committee on Investment Facilitation	Adoption by the Commission	Q2 2025	Adopted 25 April 2025 COM(2025)169

Output	Indicator	Target	**Latest known results** (situation on 31/12/2025)
Proposal for a Council Decision on the position to be adopted, on behalf of the European Union, in the Trade and Sustainable Development Board, established under the Free Trade Agreement between Singapore and the European Union, as regards the establishment of the rules of procedure of the Trade and Sustainable Development Panel of Experts	Adoption by the Commission	Q2 2026	Q2 2026 Negotiations with Singapore on the text ongoing
Proposal for a Council Decision on the position to be adopted, on behalf of the European Union, in the Trade and Sustainable Development Committee established under the Free Trade Agreement between Viet Nam and the European Union, as regards the establishment of the rules of procedure of the Trade and Sustainable Development Panel of Experts	Adoption by the Commission	Q2 2026	Q2 2026 Technical discussions between the EU and Viet Nam are ongoing following the exchange of CVs of the proposed panellists.
Proposal for a Council decision on the position to be taken on behalf of the EU in the bodies of the EU-Kenya EPA	Adoption by the Commission	Q1 2025 RoP EU-Kenya EPA Council, and Committee of Senior Officials Q3 2025 RoP EU-Kenya EPA Consultative Committee	Adopted 28 March 2025 COM(2025)156 Council Decision (EU) 2025/894 Adopted 25 September 2025 Council Decision (EU) 2025/1884
EU-Chile Interim Trade Agreement - Commission proposal for a Council Decision on the position to be taken on behalf of the European Union in the Trade Council established under the Agreement as regards the Rules of Procedures of the Trade Council and Trade Committee.	Adoption by the Commission	Q3 2025	Adopted 15 September 2025 COM(2025)489

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Commission decision on a Memorandum of Understanding on a Clean Trade and Investment Partnership between the European Union and the Republic of South Africa	Adoption by the Commission	Q3 2025	Adopted 8 October 2025 C(2025)6737
Proposal for a Council Decision on the position to be adopted, on behalf of the European Union, in the Trade Committee established under the Free Trade Agreement between Viet Nam and the European Union, as regards the establishment of a list of arbitrators	Adoption by the Commission	Q4 2025	Q2 2026 The CVs of the proposed panellists have been exchanged and are currently being reviewed; technical discussions between the EU and Viet Nam will follow in due course.
Recommendation for a Council Decision authorising the opening of negotiations for a digital trade agreement with Canada	Adoption by the Commission	Q4 2025	10 September 2025 COM(2025) 480 final Adopted by the Council 24 November 2025

General objective 1: A new plan for Europe's sustainable prosperity and competitiveness; 6. A global Europe - leveraging our power and partnerships

Specific Objective 1.2 (6.2): Improved access to markets and attraction of investment generating opportunities for EU businesses, building economies of scale and fostering innovation

Result indicator 1.2.1 (6.2.1): Percentage of fully liberalised imports from the world (MFN duty-free and preferential duty-free) - Merchandise EU imports extra EU

Explanation: This indicator will show the extent of the EU's applied preferential treatment for imports and its evolution. The bigger the share, the better economic conditions and opportunities for EU consumers, and EU businesses using imports as inputs in their production

Source of data: DG TRADE calculations based on Eurostat Easy Comext

Baseline (2023)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (2024)
74%	> baseline	> Interim milestone	74%

Result indicator 1.2.2(6.2.2): Number of EU's exporting and importing SMEs Explanation: This indicator will illustrate the level of participation of the EU SMEs in international trade and its evolution. Given the foreseen special attention to SMEs through dedicated provisions in the upcoming EU FTAs and through other means (e.g. EU-level coordinated economic diplomacy efforts, regular survey and other means to receive regular feedback from SMEs representatives), this indicator will help assess the effectiveness of these EU measures in helping SMEs to reap economic opportunities provided by imports and internationalising their business Source of data: DG TRADE calculations based on Eurostat data ([8])											
Baseline					**Interim milestone** (2027)		**Target** (2029)		**Latest known results** (2024)	
Year	**Importing**		**Exporting**		**Imp.**	**Exp.**	**Imp.**	**Exp.**	**Imp.**	**Exp.**
2022	1,156,739	95% ([9])	689,393	95%	Maintain	Maintain	Maintain	Maintain	2024 not available	2024 not available
2023	1,157,392	95%	681,958	95%						

Result indicator 1.2.3 (6.2.3): Preference utilisation rates of EU preferential trade arrangements for the EU and partners' side Explanation: This indicator will show the extent to which businesses will be making use of the EU preferential arrangements. It will give an indication how well these agreements are formulated and how the uptake is handled in the EU Member States and the partner countries Source of data: Eurostat and national customs registrations This result indicator is selected as a KPI					
Baseline			**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (2025)
Preference utilisation EU importers					
FTA	**2023**	**2024**			**2025**
United Kingdom	80.83%	83.2%	Maintain or increase rates	The objective is to increase the percentage according to recent trend. It is difficult to predict an exact percentage at a specific moment in time. Ultimately, the desire is of course to maximise the coverage over time.	82.3%
Türkiye	73.28%	92.3%			92.5%
South Korea	86.02%	89.6%			91.2%
Japan	64.89%	72.9%			71.8%
Viet Nam	62.58%	69.9%			72.4%

([8]) The data collected for this indicator is very important and relevant in substance to the EU's trade policy. However, the collection of data is not mandatory for EU Member States and thus risks being rather unstable and coming with a considerable delay.

([9]) Percentage of EU SMEs importing and/or exporting over the total number of EU companies importing and/or exporting, i.e. 95% of EU companies importing and/or exporting were SMEs.

Baseline			**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (2025)
Canada	58.55%	60.1%			65.7%
South Africa	85.76%	89.0%			89.8%
			Preference utilisation EU exporters		
FTA	**2022**	**2023**	Maintain or increase rates	The objective is to increase the percentage according to recent trend. It is difficult to predict an exact percentage at a specific moment in time. Ultimately, the desire is of course to maximise the coverage over time. Due account should be taken that certain preferences may not be used due to extraneous company choices. This should also be seen against the background of duty savings.	**2024**
United Kingdom	88.4%	89.1%			UK: 88.0%
Türkiye	85.6%	84.9%			Türkiye: 83.5%
Japan	68.5%	72.3%			Japan: 76.9%
Canada	61%	61.8%			Canada: 63.2%
South Korea	78.4%	77.7%			South Korea:79.8%
South Africa	78.2%	86.8%			South Africa:88.2%
Viet Nam	37.5%	42.7%			Viet Nam:44.8%

Result indicator 1.2.4 (6.2.4): Jobs and EU exports
Explanation: The fast changing global economy, characterised by the dynamic creation of business opportunities and increasingly complex production chains, requires a good understanding of how trade and investment flows affect employment.
Source of data: Eurostat table naio_10_fgdee: "Domestic employment in exports - EU perspective (FIGARO application)"
This result indicator is selected as a KPI

Baseline (2022)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (2023)
31.2 million jobs	> baseline	> Interim milestone	33.6 million jobs

Result indicator 1.2.5 (6.2.5): Consumer benefits from trade **Explanation: International trade, notably imports, are an important driver of individual well-being. An increase in imports directly consumed by individuals will allow consumers to have access to a wider choice of products, greater variety of goods, better quality and lower prices. EU imports classified by broad economic category (BEC) provide a separate measurement of imports for household consumption and thus offer a good proxy for the benefits brought by international trade to EU consumers** **Source of data: Eurostat. United Nations Department of Economic and Social Affairs (2018), Classification by Broad Economic Categories Rev. 5, Statistical Papers Series M No. 53, Rev.5.** **This result indicator is selected as a KPI**			
Baseline	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (2025)
2023: €436.8 billion 2024: €454.6 billion	> baseline	> Interim milestone	€ 486.5 billion

Main outputs in 2025:

New policy initiatives

Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Proposal for a Council Decision on the position to be taken on behalf of the European Union in the Association Committee in Trade configuration established by the Association Agreement between the European Union and the European Atomic Energy Community and their Member states, of the one part, and Ukraine, of the other concerning the acceleration or broadening of the scope of the elimination of customs duties.	Adoption by the Commission	Q3 2025	Adopted 28 July 2025 COM(2025)450
Proposal for a Council Decision on the position to be taken on behalf of the European Union in the Association Committee in Trade configuration established by the Association Agreement between the European Union and the European Atomic Energy Community and their Member states, of the one part, and the Republic of Moldova, of the other concerning the acceleration or broadening the scope of the elimination of customs duties.	Adoption by the Commission	Q2 2025	Adopted 28 July 2025 COM(2025)454

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Council Decision establishing the position to be adopted on the EU's behalf in the Trade Committee established under the Association Agreement between the EU and the European Atomic Energy Community and their Member States, of the one part, and Ukraine, on the other part, as regards the granting of internal market treatment to Ukraine in the roaming sector	Adoption by the Commission	Q2 2025	Adopted 17 June 2025 COM(2025)328
Proposal for a COUNCIL DECISION on the position to be taken on behalf of the European Union in the Association Committee in Trade configuration established by the Association Agreement between the European Union and the European Atomic Energy Community and their Member States, of the one part, and Ukraine, of the other part as regards the modification of Appendix XVII-3 (Rules applicable to telecommunication services) of Annex XVII to that Agreement	Adoption by the Commission	Q1 2025	Adopted 10 February 2025 COM(2025) 49 final
Commission Decision on Moldova's fulfilment of the conditions for implementing and enforcing the Union acquis in the sector of roaming on public mobile communications networks, and on communicating – in the EU-Moldova Association Committee in Trade configuration, after endorsement by the Council – the results of the Commission's assessment.	Adoption by the Commission	Q2 2025	Commission assessment was part of COM(2025)361
Proposal for a Council Decision establishing the position to be adopted on the EU's behalf in the Association Council established under the Association Agreement between the EU and the European Atomic Energy Community and their Member States, of the one part, and the Republic of Moldova, on the other part, as regards the reciprocal granting of further market opening between the EU and Moldova in the roaming sector Decide fiche in preparation	Adoption by the Commission	Q2 2025	Adopted 1 July 2025 COM(2025)361

Output	Indicator	Target	**Latest known results** (situation on 31/12/2025)
Proposal for a Council Decision on the position to be taken, on behalf of the European Union, in the Trade Committee established under the Interim Partnership Agreement between the European Community, of the one part, and the Pacific States, of the other part, as regards the amendment to be made to the Agreement to take account of the accession of Niue, the Kingdom of Tonga and Tuvalu	Adoption by the Commission	Q4 2025	Q2 2026 Awaiting notification from acceding countries.
Authorisation to Slovakia to open investment protection negotiations with Cabo Verde, Botswana and Bahrain	Adoption by the Commission	Q2 2025	Adopted 15 April 2025 C(2025)2211
Authorisation to Hungary to open investment protection negotiations with Chad	Adoption by the Commission	Q2 2025	Adopted 10 April 2025 C(2025)2145
Authorisation to Sweden to open investment protection negotiations with Saudi Arabia and Argentina	Adoption by the Commission	Q2 2025	Adopted 7 May 2025 C(2025)2661
Authorisation to Sweden to open investment protection negotiations with the State of Qatar and the United Arab Emirates	Adoption by the Commission	Q3 2025	Adopted 8 September 2025 C(2025)5982
Authorisation to Hungary to open investment protection negotiations with Equatorial Guinea and Australia	Adoption by the Commission	Q2 2025	Adopted 19 June 2025 C(2025)3839
Authorisation to Hungary to sign and conclude a Bilateral Investment Agreement with the State of Kuwait	Adoption by the Commission	Q1 2025	Adopted 29 January 2025 C(2025)508
Authorisation to Hungary to sign and conclude a Bilateral Investment Agreement with the Republic of Sierra Leone	Adoption by the Commission	Q1 2025	Adopted 18 February 2025 C(2025)978
Authorisation to Slovakia to open investment protection negotiations with Kyrgyzstan and Qatar	Adoption by the Commission	Q1 2025	Adopted 27 February 2025 C(2025)1217
Commission Implementing Decision authorising the Kingdom of Spain to sign and conclude a bilateral investment agreement with the Republic of Côte d'Ivoire	Adoption by the Commission	Q4 2025	Adopted 24 October 2025 C(2025)7087

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Proposal for a Council Decision on the position to be taken on behalf of the European Union in the Association Committee in Trade configuration established by the Association Agreement between the European Union and the European Atomic Energy Community and their Member States, of the one part, and Ukraine, of the other part as regards the modification of Appendix XVII-3 (Rules applicable to telecommunication services) of Annex XVII to that Agreement	Adoption by the Commission	Q1 2025	Adopted 10 February 2025 COM(2025)49
Evaluations and fitness checks (part of the stress testing EU acquis)			
Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Ex post Evaluation of the Agreement between the European Union and Japan for an Economic Partnership	Public consultation Business survey Staff Working Document	Q3/Q4 2025 Q3/Q4 2025 Q2 2026	EU-Japan trade agreement – ex-post evaluation
Ex post evaluation of the EU-Canada Comprehensive Economic and Trade Agreement (CETA), after five years of provisional application of the agreement.	Final report Staff Working Document	Q2 2025 Q3 2025	The final report was published in June 2025. The Staff Working Document was published in November 2025.
Ex-post evaluation of the Economic Partnership Agreement (EPA) between the European Union and its Member States and the Southern African Development Community (SADC) EPA States	Final report Staff Working Document	Q3 2024 Q4 2025	Report published September 2024 at : Ex-post evaluations Q2 2026 Pending of conclusion of ongoing EPA review.
Ex-post evaluation on key environmental provisions in trade agreements	Final report Staff Working Document	Report Q1 2025 SWD Q2 2025	Report published March 2025 link SWD published in December 2025 Link https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2025)434&lang=en

Major implementation activities and enforcement actions			
Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Market Access Days (MAD) in Member States	Number of MADs	Monthly	8 MADs took place
Market Access Advisory Committee meetings	Number of meetings	Monthly	11 MAAC meetings took place
2025 Annual Commission Report on EU trade policy implementation and enforcement	Adoption by the Commission	Q4 2025	Adopted 3 November 2025 COM(2025)920 Accompanied by SWD(2025)940 Source: Register of Commission Documents - COM(2025)920
Annual progress report on implementation and enforcement	Publication of the annual report	Q3 2025	Published on 21 October 2025 Source: 2025 Annual Progress Report on Simplification, Implementation and Enforcement of Commissioner Maroš Šefčovič - European Commission
Implementation dialogues, Annual Progress Report(s) and reality checks			
Output	**Indicator**	**Target**	**Latest known results (situation on** 31/12/20242025)
Advances on the implementation and simplification	Implementation Dialogue held	At least two in 2025	Q4; Implementation Dialogue with Commissioner Šefčovič on EU-US investment relations Event page: Implementation Dialogue on EU-US investment relations - Trade and Economic Security

Output	Indicator	Target	Latest known results (situation on 31/12/20242025)
Advances on the implementation and simplification	Realitys check held	At least two in 2025	Q2 2025: Reality Check on the Enforcement of market access commitments in EU bilateral trade agreements and the WTO Q4 2025: TRADE/COMP/GROW joint reality check on the (joint) functioning of the EU anti-dumping and anti-subsidies regulations and the EU Foreign Subsidies Regulation

Other major outputs

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
	DAG meetings	10 DAG meetings	20 DAG meetings
	Civil Society fora	9 Civil Society fora	10 Civil Society for a held
	Meeting of the CARIFORUM-EU Consultative Committee	One meeting	
	Civil Society Dialogues where Trade and Sustainable Development issues are discussed	12	11 CSDs held where Trade and Sustainable Development issues are discussed

Output	Indicator	Target	**Latest known results** (situation on 31/12/2025)
Structured dialogues with stakeholders on Trade and Sustainable Development (TSD) issues	Annual dialogues for selected GSP/EBA beneficiaries	6 dialogues for six countries	13 dialogues for 10 countries : **EBA** : Bangladesh: 4 dialogues Bhutan: 1 dialogue Ethiopia: 1 dialogue Lao: 1 dialogue Nepal: 1 dialogue Senegal: 1 dialogue Sierra Leone: 1 dialogue Togo: 1 dialogue Cambodia: 1 dialogue **Standard GSP**: Nigeria: 1
	Biannual dialogues per GSP+ beneficiary, where discussion platform available	19 dialogues for 8 countries	30 dialogues for 9 countries : Mongolia: 3 dialogues Tajikistan: 2 dialogues Uzbekistan: 6 dialogues, including 1 monitoring mission Kyrgyzstan: 2 dialogues Pakistan: 5 dialogues, including 1 monitoring mission Bolivia: 2 dialogues Philippines: 4 dialogues Cabo Verde: 2 dialogues Sri Lanka: 4 dialogues, including 1 monitoring mission
Commission Decision on determining the Union position for an update of Sectoral Annexes to the Agreement on Mutual Recognition between the European Community and Australia	Adoption by the Commission	On hold	The underlying discussions with Australia on substance have been put on hold.

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Recommendation for a Council decision concerning new negotiating directives for a regional Free Trade Agreement and bilateral Free Trade Agreements with the countries of the Cooperation Council for the Arab States of the Gulf and respectively the Kingdom of Bahrain, the State of Kuwait, the Sultanate of Oman, the State of Qatar, the Kingdom of Saudi Arabia and the State of the United Arab Emirates	Adoption by the Commission	Q2 2025	Adopted 8 May 2025 COM(2025)194
Commission proposal for a Council Decision on the position to be taken on behalf of the European Union within the Trade Committee established by the Free Trade Agreement between the European Union and its Member States, of the one part, and the Republic of Korea, of the other part, as regards the amendment of Appendices 2-C-2 and 2-C-3 of Annex 2-C of the Agreement	Adoption by the Commission	Q4 2025	Process ongoing but adoption did not take place as foreseen due to the slow engagement of the FTA partner, Korea in amending the relevant annexes. Adoption date to be confirmed (Q2 2026)
Proposal for a Council Decision on the position to be taken on the Union's behalf in the Association Committee in Trade configuration established by the Association Agreement between the European Union and the European Atomic Energy Community and their Member states, of the one part, and Moldova, of the other as regards the recognition of partial implementation by Moldova of the roadmap in Annex XXIX-B to Chapter 8 on public procurement	Adoption by the Commission	Q4 2025	Adoption date to be confirmed (Q4 2026)

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Council decision on the position to be adopted on behalf of the European Union, in the Partnership Committee established by the Comprehensive and Enhanced Partnership Agreement between the European Union and the European Atomic Energy Community and their Member States, of the one part, and the Republic of Armenia, of the other part in relation to the establishment of a list of arbitrators	Adoption by the Commission	Q2 2025	Adopted 14 May 2025 COM(2025)199
Commission proposal for a Council Decision on the position to be taken on behalf of the European Union in the Association Committee in Trade configuration established by the Association Agreement between the European Union and the European Atomic Energy Community and their Member states, of the one part, and the Republic of Moldova, of the other concerning the list of arbitrators	Adoption by the Commission	Q4 2025	Adopted 26 November 2025 COM(2025)714
Commission Delegated Regulation amending Annexes II, IV and VII to Regulation (EU) No 978/2012 applying a scheme of generalised tariff preferences	Adoption by the Commission	Q3 2025	Adopted 29 September 2025 C(2025)6479 and published in the OJ of 9/12/2025 as regulation 2025/1951
Proposal for a Council Decision on the position to be taken on behalf of the European Union in the Trade Committee established by the Free Trade Agreement between the European Union and New Zealand, on the adoption of the operational guidelines for the Civil Society Forum	Adoption by the Commission	Q3 2025	Adopted 30 September 2025 COM(2025)568 Council Decision adopted on 20 October 2025 (2025/2168)
Proposal for a Council Decision on the position to be adopted, on behalf of the European Union, in the Trade Committee established under the Free Trade Agreement between Singapore and the European Union, as regards the establishment of a list of arbitrators	Adoption by the Commission	Q4 2025	Q2 2026 Negotiations with Singapore on the list ongoing

Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Proposal for a Council Decision on the position to be adopted, on behalf of the European Union, in the Trade and Sustainable Development Committee established under the Free Trade Agreement between Viet Nam and the European Union, as regards the establishment of a list of individuals for the Panel of Experts	Adoption by the Commission	Q4 2025	Q2 2026 Technical discussions between the EU and Viet Nam are ongoing following the exchange of CVs of the proposed panellists.
Proposal for a Council Decision on the position to be adopted, on behalf of the European Union, in the Trade and Sustainable Development Board, established under the Free Trade Agreement between Singapore and the European Union, as regards the establishment of a list of individuals for the Panel of Experts	Adoption by the Commission	Q4 2025	Q2 2026 Negotiations with Singapore on the list ongoing
Establishment of a panel of experts under Article 409 of the EU-UK Trade and Cooperation Agreement	Adoption by the Commission	Q3 2025	Adopted 23 February 2026 COM(2026)89

General objective 1: A new plan for Europe's sustainable prosperity and competitiveness				
Specific Objective 1.3: The EU's economic security is strengthened through promoting the EU's competitiveness, protecting the EU from economic security risks and partnering with others				
Result indicator 1.3.1: Perform an evaluation of the functioning of the Dual-Use Export Control Regulation **Explanation: The evaluation of the Dual-Use Export Control Regulation will look into improving the effectiveness and efficiency of the EU's Dual-Use Export Control rules** **Source of data: DG TRADE** **This result indicator is selected as a KPI**				
Baseline (2024)	**Interim milestone** (2026)	**Interim milestone** (2027)	**Target** (2028)	**Latest known results** (2025)
Current dual use Regulation	Start evaluation of the functioning of the current dual use Regulation	Conduct stakeholders' consultation on the functioning of the current dual use Regulation	Conclude evaluation and present Commission report on the review of the dual use Regulation	The evaluation project is in the process of being launched. FISMA F.3 is going to procure a study to support the evaluation (preliminary target date for kick-off 01/05/2026), consultation activities (call for evidence and open public consultation) to be launched in Q2 2026.

Main outputs in 2025:			
New policy initiatives			
Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Commission Delegated Regulation amending the list of dual-use items in Annex I to Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items	Adoption by the Commission	Q3 2025	Adopted by COM on 8th September 2025 C(2025)5947 Published in the OJ as Delegated Regulation (EU) 2025/2003 of 8 September 2025 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32025R2003

Other major outputs			
Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Report from the Commission to the European Parliament and the Council on the implementation of Regulation (EU) No 2021/821 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items	Adoption by the Commission	Q1 2025	Adopted 30 January 2025 COM(2025)19
Statistical Staff Working Document on Implementation of Regulation (EU) 2021/821 for the year 2023	Adoption by the Commission	Q2 2025	Published on 4 July 2025 https://circabc.europa.eu/ui/group/654251c7-f897-4098-afc3-6eb39477797e/library/40f89316-b1c4-4809-a4a1-c12d5d2a427c/details
Annual Report on Implementation of Regulation (EU) 2021/821 for the year 2024	Adoption by the Commission	Q4 2025	Q2 2026
Fift Annual Report on the screening of foreign direct investments into the Union	Adoption by the Commission	Q4 2025	Adopted on 14 October 2025 COM(2025) 632 final https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2025)632&lang=en
Proposal for a Regulation of the European Parliament and of the Council on the screening of foreign investments in the Union and repealing Regulation (EU) 2019/452 of the European Parliament and of the Council	Adoption by the Commission progress/adoption by the co-legislators		COM(2024)23 Political compromise between co-legislators reached in December 2025, formal adoption pending.

General objective 1: A new plan for Europe's sustainable prosperity and competitiveness			
Specific Objective 1.4: Businesses are protected from unfair trade practices in the EU and abroad by deploying all EU instruments available to tackle such practices by third countries			
Result indicator 1.4.1: Number of jobs in sectors covered by the trade defence measures **Explanation: The adoption of trade defence measures contribute to maintaining jobs in the industrial sectors** **Source of data: DG TRADE** **This result indicator is selected as a KPI**			
Baseline (2024)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (2025)
At the end of 2024, more than 625.000 jobs were covered by the trade defence measures [10]	For measures under review at the end of their statutory duration, the level of employment while the measures were in force shows a status quo or an increase	On a yearly basis, the comparison of employment between the original imposition of measures and their expiry shows a status quo or an increase	At the end of 2025, more than 637.000 jobs were covered by the trade defence measures

Main outputs in 2025:			
New policy initiatives			
Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
43rd Annual Report from the Commission to the European Parliament and the Council on the EU's Anti-Dumping, Anti-Subsidy and Safeguard activities and the Use of Trade Defence Instruments by Third Countries targeting the EU in 2024	Adoption by the Commission	Q2 2025	Adopted 28 July 2025 COM(2025)428
Commission Report to the European Parliament and to the Council pursuant to Article 13 of Regulation (EU) 2022/1031 regarding the application of Regulation (EU) 2022/1031 and on the progress made in international negotiations access for Union economic operators to the public procurement or concession markets of third countries, undertaken under this Regulation.	Adoption by the Commission	Q3 2025	Adopted 30 July 2025 COM(2025)430

[10] The latest know results are based on the overall jobs covered. The comparison of employment between the original imposition of measures and their expiry will be possible once the new system to monitor TDI activity is operational.

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Commission proposal for a Regulation of the Parliament and the Council to address the negative trade-related effects of global excess capacity on the EU steel sector	Adoption by the Commission	Q3 2025	Adopted 7 October 2025 COM(2025)726

Evaluations and fitness checks (part of the stress testing EU acquis)

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Assessment of the effectiveness of TDI measures	Concluding contract with external economic analysis service provider Final report	Q4 2025 Q3 2026	Q4 2026

Major Other major outputs

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Commission Delegated Regulation amending the Annex to Regulation (EU) 2019/287 of the European Parliament and of the Council implementing bilateral safeguard clauses and other mechanisms allowing for the temporary withdrawal of preferences in certain trade agreements concluded between the European Union and third countries	Adoption by the Commission	Q1 2025	Adopted 25 February 2025 C(2025)1148
Commission Implementing Regulation (EU) amending Implementing Regulation (EU) 2019/159, including the prolongation of the safeguard measure on imports of certain steel products	Adoption by the Commission	Q1 2025	Adopted 24 March 2025 C(2025)1892
Commission Implementing Regulation (EU) amending and correcting Commission Implementing Regulation (EU) 2019/159 imposing a definitive safeguard measure on imports of certain steel products	Adoption by the Commission	Q2 2025	Adopted 29 July 2025 C(2025)5357
Commission Implementing Regulation (EU) 2025/2351 imposing a definitive safeguard measure with regard to imports of certain ferro-alloying elements	Adoption by the Commission	Q4 2025	Adopted 18 November 2025 C(2025)7842

General objective 1: A new plan for Europe's sustainable prosperity and competitiveness; 6. A global Europe - leveraging our power and partnerships

Specific Objective 1.5:(6.5): Rules-based trade is sustained, including through a reformed and strengthened World Trade Organization, alongside the OECD and other relevant international fora

Result indicator 1.5.1 (6.5.1): Comprehensive reform of the World Trade Organization
Explanation: The advances on the reform of the WTO across all its functions will be an strategic objective. A well-functioning WTO plays a critical role for the European Economic Security
Source of data: DG TRADE
This result indicator is selected as a KPI

Baseline (2024)	**Interim milestone** (2026)	**Target** (2028)	**Latest known results** (2026)
Launch of WTO reform work at the 12th Ministerial Conference at the WTO and reaffirmation of this at the 13th Ministerial Conference (MC13) in 2024	Progress achieved in the 14th Ministerial Conference (MC14) on WTO reform, notably an ambitious work programme for reform	Ministerial decisions delivering more fairness and flexibility	EU submission on WTO reform (21 January 2026)

Main outputs in 2025:

New policy initiatives

Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Proposal for a Council Decision on the formal acceptance of the WTO Agreement on Electronic Commerce by the Union	Adoption by the Commission	Q4 2025	Q2 2026
Proposal for a Council Decision on the position to be taken on behalf of the European Union in the World Trade Organization's 14th Ministerial Conference	Adoption by the Commission	Q4 2025	Adopted 20 January2026 COM(2026) 8 final
Proposal for a Council Decision on the position to be taken on behalf of the European Union regarding the envisaged decision of the Participants to the Arrangement on Officially Supported Export Credits on interest rate provisions	Adoption by the Commission	Q2 2025	Adopted 26 May 2025 COM(2025)253

Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Proposal for a Council Decision establishing the position to be adopted on the Union's behalf with regard to the Decision of the Participants to the Arrangement on Officially Supported Export Credits to integrate the agreement on untied ODA credits transparency in the OECD Arrangement on Officially Supported Export Credits	Adoption by the Commission	Q2 2025	Adopted 26 May 2025 COM(2025)254
Proposal for a Council Decision establishing the position to be adopted on the Union's behalf in the written procedure by the Participants to the Arrangement on Officially Supported Export Credits in relation to the common line to grant tied aid eligibility to Ukraine	Adoption by the Commission	Q2 2025	Adopted 26 May 2025 COM(2025)252
Proposal for a Framework Council Decision establishing the position to be adopted on the Union's behalf in the written procedure by the Participants to the Arrangement on Officially Supported Export Credits in recurring situations.	Adoption by the Commission	Q3 2025	Q2 2026
Annual Report from the European Commission to the European Parliament and the Council on negotiations undertaken by the Commission in the field of export credits for the year 2024, within the meaning of Regulation (EU) 1233/2011, Annex I	Adoption by the Commission	Q4 2025	Adopted 3 December 2025 COM(2025)688
Annual Review by the European Commission of Member States' Annual Activity Reports on Export Credits for year 2024 in the sense of Regulation (EU) 1233/2011, Annexe I.	Adoption by the Commission	Q4 2025	Adopted 3 December 2025 COM(2025)737
Rules of Procedure of the Committee on Fisheries Subsidies of the World Trade Organization	Adoption by the Commission	Q4 2025	Q2 2026
Adapted text of the sector understanding on export credits for civil aircrafts, regarding maintenance and other services	Adoption by the Commission	Q1 2025	Adopted 17 February 2025 COM(2025)44

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Proposal for a Council Decision establishing the position to be taken on behalf of the European Union on adding the Agreement on Electronic Commerce into the Agreement establishing the World Trade Organization	Adoption by the Commission	Q1 2025	Adopted 6 February 2025 COM(2025)33
Proposal for a Council Decision establishing the position to be taken on behalf of the Union in the written procedure by the Participants to the Arrangement on Officially Supported Export Credits and the Participants to the Sector Understanding on Civil Aircraft (“ASU”) regarding the obligor rating process in de minimis transactions	Adoption by the Commission	Q4 2025	Adopted 10 October 2025 COM(2025)582 Final

ANNEX 3: Draft annual accounts and financial reports

https://dashboard.tech.ec.europa.eu/qs_digit_dashboard_mt/public/extensions/BUDG_Annex3/BUDG_Annex3.html

ANNEX 4: Financial scorecard

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. In some cases, this has resulted in lower performance for some standard financial indicators such as timely payments.

https://dashboard.tech.ec.europa.eu/qs_digit_dashboard_mt/public/extensions/BUDG_Annex4/BUDG_Annex4.html

ANNEX 5: Materiality criteria

In conformity with the existing guidelines, DG TRADE retained the following materiality criteria:

Quantitative criteria

As regards legality and regularity, the proposed standard quantitative materiality threshold of 2% of the executed payments is applied. DG TRADE considers it to be an appropriate threshold above which weaknesses detected should be considered “material”.

In DG TRADE this applies to all non-compliance events detected throughout the year and with a quantifiable impact on legality and regularity.

Since 2019 ([11]), a 'de minimis' threshold for financial reservations has been introduced. Quantified AAR reservations related to residual error rates above the 2% materiality threshold, are deemed not substantial for segments representing less than 5% of a DG’s total payments and with a financial impact below EUR 5 million. In such cases, quantified reservations are no longer needed.

Qualitative criteria

DG TRADE’s activities are mostly of a political nature (trade and investment negotiations, monitoring and implementation, enforcement and outreach) and procedural (case-handling), involving a very modest level of financial management.

Qualitative criteria cover significant reputational risks for the DG or the Commission and significant weaknesses in the internal control systems. For assessing the significance of the weakness, the nature and scope, duration, existence of mitigating controls and/or remedial actions are taken into account.

In this respect, if a ‘critical’ recommendation would be issued by auditors in the context of a final audit report, provided it is accepted by the auditee, and that sufficient corrective action has not been taken to implement this recommendation, the impact on the assurance and any reputational risk will be considered.

([11]) Agreement of the Corporate Management Board of 30/4/2019.

ANNEX 6: Relevant Control System(s) for budget implementation (RCSs)

RCS 1: Public Procurement (including administrative expenditures) in direct management

This segment also includes administrative expenses for missions, meetings of committees and expert groups, which are reported by the service responsible for the commitment, although the payments are executed by another service, notably the PMO[12]. The executing service implements the necessary technical-level controls and submits a declaration to DG TRADE on the compliance of these payments with the principle of sound financial management, as well as their legality and regularity. These expenses are considered to present a low level of risk and are therefore subject to a flat rate of 0.5%, as corroborated by the control results of the executing service(s). More information on the implemented controls can be found in the PMO's annual activity report.

Stage 1:

A: Planning and needs assessment

Main internal control objectives: Effectiveness, efficiency and economy. Compliance (legality and regularity)

Main risks **It may happen (again) that…**	**Mitigating controls**	**Coverage, frequency and depth of controls**	**Cost-Effectiveness indicators (three E's)**
Procurement needs are not well defined Inappropriate choice of procurement procedure The best offer/s are not submitted/received due to a poor definition in the tender specifications	Procurement needs are clearly defined and justified from an economic/operational view and approved by the AO(S)D Ex ante support and verification Trainings provided centrally and locally Selection criteria clearly defined and approved by the AOSD	**Coverage**: 100% **Frequency:** At least before launch	**Effectiveness:** Commitment rate Benefits: best possible offers received Number of legal cases/complaints **Efficiency:** Number of tenders cancelled Number of project officers followed training

([12]) Type III co-delegation for which these expenses were reported by the service executing the payments until 2024.

Main risks It may happen (again) that…	Mitigating controls	Coverage, frequency and depth of controls	Cost-Effectiveness indicators (three E's)
			Economy: Estimation of cost of staff involved

B: Selection of the offer & evaluation

Main internal control objectives: Effectiveness, efficiency and economy. Compliance (legality and regularity). Fraud prevention and detection

Main risks It may happen (again) that…	Mitigating controls	Coverage, frequency and depth of controls	Cost-Effectiveness indicators (three E's)
Insufficient quality of the evaluation report, impacting the award decision Existence of conflict of interest Non-compliance with regulatory framework Over-dependency	Formal evaluation process: Opening and evaluation committee Opening and evaluation committee's declaration of absence of conflict of interest Opinion of Financial Verifying Agent Exclusion criteria documented Standstill period, unsuccessful tenderers to put forward their concerns on the decision	**Coverage**: 100% **Depth**: all documents transmitted and analysed; all declarations of conflict of interest for all members	**Effectiveness:** Number of non-award decisions Benefits: compliance with Financial Regulation Number of cases referred to OLAF Number of legal cases/complaints **Efficiency:** Number of unfavourable opinions by financial verification **Economy:** Estimation of cost of staff involved

Stage 2: Financial transaction

Main internal control objectives: Ensuring that the implementation of the contract is in compliance with the legal requirements

Main risks It may happen (again) that…	Mitigating controls	Coverage, frequency and depth of controls	Cost-Effectiveness indicators (three E's)
Non-compliance with legal requirements (payment deadlines, timely closure) Lack of experience and skills of operational and financial agents Operational monitoring - the services foreseen are not, totally or partially, provided in accordance with the technical description and requirements foreseen in the contract Financial monitoring - the amounts paid exceed those due in accordance with the applicable contractual and regulatory provisions	Ex-ante support, including local training DG TRADE applies the financial circuit "decentralised with counterweight" for all transactions Monitoring and supervision mechanisms (spring and autumn reviews, Resources Report, weekly financial reporting)	**Coverage**:100% of all procurement contracts	**Effectiveness:** Benefits: Amounts recovered or potential overpayments detected (credit notes) Amount of credit notes Recovery Orders Outstanding RAL (Reste à liquider) Number of cases referred to OLAF Number of legal cases/Ombudsman **Efficiency:** Payments times % Payment execution Number of project officers followed training **Economy:** Estimation of cost of staff involved

Stage 3: Supervisory measures

Main internal control objectives: Ensuring that any weakness in the procedures is detected and corrected

Main risks It may happen (again) that…	Mitigating controls	Coverage, frequency and depth of controls	Cost-Effectiveness indicators (three E's)
An error in relation to the regulatory and /or contractual provisions or fraud is not prevented/ detected ex ante	Analysis of non-compliance events Audits performed by IAS and ECA	**Coverage:** 100% non-compliance events; all audits	**Effectiveness:** Benefits: Amounts recovered Number of cases referred to OLAF

Main risks It may happen (again) that…	Mitigating controls	Coverage, frequency and depth of controls	Cost-Effectiveness indicators (three E's)
		Depth: review procedures if weaknesses detected	Recovery Orders **Efficiency:** Costs of controls **Economy:** Estimation of cost of staff involved

RCS 2: Contributions to international organisations (contribution agreements) - indirect management and grants – direct management

Stage 1: Programming, evaluation and selection of proposal

Main internal control objectives: To ensure that all agreements are awarded in accordance with the Financial Regulation and that the essential elements are laid down in the corresponding Financing Decision; Compliance (legality and regularity)

Main risks It may happen (again) that…	Mitigating controls	Coverage, frequency and depth of controls	Cost-Effectiveness indicators (three E's)
The agreement is not included in the Financing Decision The Financing Decision does not adequately include the essential selection and award criteria The Financing Decision does not spell out the reasons for an agreement (Art. 190 RAP) The status of the International Organisation regarding the Pillar Assessment is not properly reflected in the grant agreement to be signed with the Organisation The evaluation is not carried out in accordance with the Financial	Inter-service consultation, including all relevant units and DGs Adoption by the Commission Specific procedure Evaluation Report/ Award Decision Opinion of Financial Verifying Agent Inclusion in check-list	Coverage: 100% of all grant agreements Frequency: during preparation of the Financing Decision/each Commitment request Depth: Checklist	**Effectiveness:** Benefits: Full compliance/Reach objectives of the budget line Commitment rate Number of unfavourable opinions by financial verification **Efficiency:** Cost of controls **Economy:** Estimation of cost of staff involved

Main risks It may happen (again) that…	**Mitigating controls**	**Coverage, frequency and depth of controls**	**Cost-Effectiveness indicators (three E's)**
Regulation, established procedures and/or the criteria set out in the Financing Decision			

Stage 2: Contracting and monitoring of the implementation of the agreements

Main internal control objectives: Ensuring that all agreements are signed with international organizations in accordance to Financial Regulation, Compliance (legality and regularity)

Main risks It may happen (again) that…	**Mitigating controls**	**Coverage, frequency and depth of controls**	**Cost-Effectiveness indicators (three E's)**
The agreement is signed late The agreement does not contain all applicable/necessary provisions The estimated budget to the agreement does not correspond to the action proposed Changes to the agreement have not been properly documented or authorised The action implemented does not correspond to the agreement Ineligible costs are reimbursed Payments are made late Timely clearing of pre-financing	Spring/Autumn reviews Administrative Coordination Assistants meetings Detailed guidance on Intranet and checklist Use Commission templates (PaGODA) Upstream assistance (incl. training of project officers) Ex-ante verification Verification Accounting controls Management declaration of the entrusted entities	**Coverage**: 100% of all agreements **Depth**: check in detail all Effectiveness	**Effectiveness:** Benefits: Full compliance Exceptions Amount of credit notes Recovery orders Outstanding RAL **Efficiency:** Number of project officers followed training Non-compliance events Payment times % Payment execution **Economy:** Estimation of cost of staff involved

Stage 3: Supervisory measures

Main internal control objectives: Ensuring that any weakness in the procedures is detected and corrected

Main risks **It may happen (again) that…**	**Mitigating controls**	**Coverage, frequency and depth of controls**	**Cost-Effectiveness indicators (three E's)**
An error in relation to the regulatory and /or contractual provisions or fraud is not prevented/ detected ex ante	Analysis of non-compliance events Audits performed by IAS and ECA	**Coverage**: 100% non-compliance events; all audits **Depth:** review procedures if weaknesses detected	**Effectiveness:** Benefits: Amounts recovered Recovery orders Number of cases referred to OLAF **Efficiency:** Costs of controls **Economy:** Estimation of cost of staff involved

ANNEX 7: Specific annexes related to "financial management"

A. Free content:

Financial management

In 2025, administrative expenses related to missions, meetings of committees and expert groups, are reported by the service responsible for the commitment, although the payments were executed by another service, notably the PMO[13], which, until 2024, also reported the corresponding expenditure. This new reporting arrangement was introduced in the context of data rationalisation linked to the implementation of the Commission's new IT accounting system. In 2025, these expenses represented about 15% of the DG TRADEs total amount paid.

Fraud risk management

Objective: The risk of fraud is minimised through the application of effective anti-fraud measures and the implementation of the Commission anti-fraud strategy ([14]) aimed at the prevention, detection and correction ([15]) of fraud		
Indicator 1: Implementation of the actions included in DG TRADE's anti-fraud strategy over the whole lifetime of the strategic plan (2025-2029) **Source of data:** DG TRADE annual activity report, DG TRADE anti-fraud strategy, OLAF reporting		
Baseline (2024)	**Target** (2029)	**Latest known results** (situation on 31/12/2025)
89%	100% of due actions implemented each year	96% ([16])

([13]) Type III co-delegation.

([14]) Communication from the Commission 'Commission Anti-Fraud Strategy: enhanced action to protect the EU budget', COM(2019) 176 of 29 April 2019 – 'the CAFS Communication'; Communication from the Commission "Commission Anti-Fraud Strategy Action plan – revision 2023" COM(2023) 405 of 11 July 2023 – "the Communication on the 2023 revision" – and the accompanying revised action plan, SWD(2023) 245– "the revised Action Plan".

([15]) Correction of fraud is an umbrella term, which refers in particular to the recovery of amounts unduly spent and to administrative sanctions.

([16]) In 2025, DG TRADE published its revised Anti-Fraud Strategy. Remaining improvement includes a reminder on financial rules and procedures as well as potential areas of fraud.

Main outputs in 2025:			
Description	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Awareness raising events on fraud prevention	Delivery	At least once per year	Four newcomer trainings, two fraud specific training events and three occasions with written awareness raising initiatives.
In the context of trade defence instruments (TDI): Organise regular training courses, in particular for newcomers, exchange of experience and best practices	Delivery	At least once per year	There were regular meetings, exchanges of information and two trainings ([17]) on fraud awareness.
Internal communication and training on ethics, with and special emphasis on conflict of interest, relations with lobbyist, duty of discretion and whistleblowing	Delivery	At least once per year	Four newcomer trainings, two trainings for new trainees, and two occasions with written awareness raising initiatives.

B. Compulsory for all departments:

1. Reports and documentation considered for the assessment of the DG's functioning in view of the AOD's assurance:

- the reports from Authorising Officers by Subdelegation (AOSDs);
- the reports on control results from the pillar assessment from entrusted entities in indirect management;
- the contribution by the Director in charge of Risk Management and Internal Control, including the results of internal control monitoring at DG level;
- the reports on recorded exceptions, non-compliance events and any cases of 'confirmation of instructions' (Art 92.3 FR);
- the observations and the recommendations reported by the European Court of Auditors (ECA).

2. Financial Regulation: Additional reporting requirements resulting from the 2018 and 2024 revisions.

In line with the requirements of the Financial Regulation, DG TRADE reports for the year 2025:

([17]) There were two trainings as part of the newcomers training, with the participation of OLAF, on their role in combatting fraud.

1) Cases of any in-kind donation made to the Union, for the purposes of humanitarian aid, emergency support, civil protection or crisis management aid (FR art 25.3): no such cases for the department

2) Cases of "confirmation of instructions" (FR art 92.3): no such cases for the department

3) Cases of financing not linked to costs (FR art 125.3): no such cases for the department

4) Financial Framework Partnerships >4 years (FR art 131.4): no such cases for the department

5) Cases of flat-rates >7% for funding indirect costs (FR art 184.6): no such cases for the department

6) Derogations from the principle of non-retroactivity pursuant to Article 196 of the Financial Regulation: no such cases for the department

7) Cases of financial support to third parties >EUR 60 000 (FR art 207): no such cases for the department

8) Non-financial donations provided in the form of services, supplies or works (FR art 244.3): no such cases for the department

3. Table Y on the estimated "cost of controls" at Commission level

Overview of department 's estimated cost of controls at Commission (EC) level:

TRADE	Ex ante controls***			Ex post controls			Total	
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
Segment of expenditure (as in Table X) / Relevant Control System (RCS) / Other as defined in Annex 6 of the AAR*	EC total costs	related payments Made	Ratio (%)** *(a)/(b)*	EC total costs	total value verified and/or audited	Ratio (%) *(d)/(e)*	EC total estimated cost of controls *(a)+(d)*	Ratio (%)** *(g)/(b)*
Public procurement - direct management and contributions to international organisations - direct and indirect management	1,673,880.00 €	20,384,092.78 €	8.21%	- €	- €	0.00%	1,673,880.00 €	8.21%
OVERALL total estimated cost of control at EC level for expenditure	**1,673,880.00 €**	**20,384,092.78 €**	**8.21%**	**- €**	**- €**	**0.00%**	**1,673,880.00 €**	**8.21%**

The cost of control in DG TRADE is exclusively calculated by estimating the number of FTEs (full time equivalent) dedicated to the different control stages. No other expenditure is incurred in this respect. For 2025, the overall cost of control is estimated at EUR 1.67 million. This corresponds to 10.5 FTE, representing the estimated combined effort of actors in the financial and operational units involved in the execution and verification of financial transactions in DG TRADE.

Details of the estimated cost of controls related to shared/pooled control activities carried out by REA are reported in the Annual activity report of REA. Details of the estimated cost of the control activities related to payments for missions, meetings of committees and expert groups, executed by DG PMO are reported in the activity report of PMO.

ANNEX 8: Reporting on the internal and external audits and assessing the effectiveness of internal control systems

1. Detailed state of play of implementation of completed audits

- **ECA performance audit on the enforcement of trade defence policy (TDI)**

In March 2019, the ECA launched a performance audit on the enforcement of trade defence policy and published the final report in July 2020. The audit concluded that the Commission was successful as an enforcer of trade defence policy, that it followed procedures properly during the investigations and it made sure that the parties concerned received equal treatment. However, the ECA recommended some improvements in the following areas: to document the confidentiality assessment, to raise awareness about TDI, to improve guidance on competition aspects, to improve the monitoring of measures, to fully use ex-officio procedures, and to prioritise the EU's response to third country measures.

Most of the recommendations have already been implemented. The only open recommendation is related to the assessment of the effectiveness of trade defence measures that will be carried out later than planned at the time of the audit (the signature of the assessment study contract is currently planned for early 2026) and the current plan is to finalise it by end of 2027.

- **ECA performance audit on Foreign Direct Investment (FDI) screening in addressing security and public order risks**

In June 2022, the ECA launched a performance audit on FDI screening and published the final report in December 2023. The auditors issued four recommendations: to amend the Regulation to strengthen the EU FDI screening framework; to assess whether national screening mechanisms comply with regulatory standards and streamline concepts across EU screening mechanisms; to improve the cooperation mechanism and the Commission's assessments to provide better justification of mitigating actions relating to high-risk cases; and to improve the quality of reporting.

Most of the recommendations have already been implemented. The only open recommendation is related to the assessment of national screening mechanisms. The implementation is linked to the pending adoption of the proposed review of the FDI Screening Regulation. The Commission had published a legislative proposal in January 2024. After almost two years of negotiations, slowed in part by the 2024 European Parliament elections, the co-legislators reached a political compromise, endorsed at the final trilogue on 11 December 2025. The revised Regulation is expected to be adopted on Q2 2026 and to apply from the end of 2027. The implementation of the last recommendation will be considered after the adoption of the revised Regulation.

- **IAS Audit on Allocation of Human Resources in EU Delegations (INTPA, NEAR, FPI, TRADE and EEAS)**

The multi-DG audit was finalised in November 2024 with recommendations for improvements in two areas: the methodology of workload assessment and a review of local agent tasks. As outlined in the action plan, DG TRADE implemented the very important recommendation on methodology of workload assessment in November 2025 which the IAS closed in February 2026. Furthermore, DG TRADE implemented the remaining important recommendation on local agents in December 2025.

- **IAS audit on IT security risk management at the Commission (DIGIT, AGRI, CNECT, DGT, ECHO, ENER, MARE, OLAF, OP, RTD, SANTE, TRADE)**

The horizontal audit was finalised in January 2025 with recommendations for improvements in four areas: IT security risk management methodologies and tools; IT risk appetite and acceptance criteria; IT security monitoring and reporting; and finally, the completeness and accuracy of IT security information. The recommendation on IT security risk management methodologies and tools is considered as a very important recommendation by the IAS.

DG TRADE has implemented the recommendations on IT risk appetite and acceptance criteria, as well as on the completeness and accuracy of IT security information in November 2025. The two remaining recommendations will be implemented in line with the agreed action plan. The very important recommendation on IT security risk management methodologies and tools has a current implementation rate of 60% and will be finalised by end of 2027, whereas the important recommendation on IT security monitoring and reporting has a current implementation rate of 66% and will be finalised by end of 2026.

2. 2025 Assessment of the internal control systems in DG TRADE (compliance with ICP No 16)

Management assessed on a continuous basis the effectiveness of the internal control systems to determine whether the controls in place worked as intended and ensured that any control weaknesses in the system were detected, analysed and considered for improvement. In addition, management performed specific assessments to ascertain whether the internal control systems and their components were present and functioning. The purpose of these management assessments was to provide reasonable assurance that the internal control principles (ICPs) adopted by the Commission are implemented and functioning in the DG, that the assessment findings were evaluated and that any deficiencies were communicated and corrected in a timely manner, with serious matters reported as appropriate.

The 2025 assessment of the internal control systems was launched in December 2025 and completed in March 2026 following the methodology established in the "Implementation Guide of the Internal Control Framework of the Commission". The report was sent to the Director responsible for Risk Management and Internal Control.

In general, the control system in place in DG TRADE was effective and remained stable compared to previous years. No new audit recommendations with further improvement needs were issued in 2025.

Methodology of the 2025 assessment:

Considering DG TRADE's profile and operational priorities, the exercise was based on the following elements:

- An analysis of the internal control monitoring criteria;

- DG TRADE’s results in the 2025 Staff Survey;
- A desk review of information collected throughout the year for internal control matters, in particular records from management meetings, trainings and meetings covering specific internal control issues (e.g. security, access to documents, ethics, etc.);
- Results of the latest risk assessment exercise;
- The reports by the Authorising Officers by Subdelegation (AOSD Declaration);
- The register of exceptions and non-compliance events;
- Audit/control information (IAS, ECA, OLAF) and DG TRADE's actions undertaken in response to it, exception reports, and relations with central services.

The assessment was complemented by individual requests to the units in charge of the implementation of a particular internal control principle, notably on resources, planning, internal or external communication, information security and evaluation of activities, to obtain the necessary explanations and supporting evidence to reach a conclusion on the effectiveness of the selected principle.

It is important to note that assessing the internal control systems in DG TRADE is generally accomplished through observation, inquiry and review rather than detailed testing.

Outcome of the 2025 assessment:

The overall conclusion is that the internal control systems during the reporting year was effective, and the components and principles were present and functioning well overall. Nonetheless, some improvements are needed. Based on the assessment, no new weaknesses were identified, and the main remedial measures include the on-going implementation of audit recommendations and the follow-up of actions outlined in DG TRADE’s Staff Action Plan. These deficiencies are related to seven Internal Control Principles (ICP), namely ICP 3 “structures and reporting lines”, ICP 4 "commitment to competent staff", ICP 5 “internal control responsibilities”, ICP 11 “control over technology”, ICP 12 “corporate policies”, ICP 13 “functioning of internal control”, and ICP 14 “internal communication”.

Some improvements and remedial measures were already taken in 2025:

- Implementation of the Action Plan following a very important recommendation made by the IAS on *Allocation of Human Resources in EU Delegations to Commission services* regarding the design and implementation of the WLAD (ICP 4, ICP 6).

- Implementation of the Action Plans following other recommendations made by the IAS on the audits regarding:
    - *Implementation of bilateral trade agreements* in improving the objectives and indicators related to the implementation of bilateral trade agreements (ICP 3);
    - *Allocation of Human Resources in EU Delegations to Commission services* related to the realignment of types of staff contracts and the role of local agents (ICP 4, ICP 6);
    - *IT security risk management at the Commission* related to the IT risk appetite and acceptance criteria, and the completeness and accuracy of IT security information (ICP 11, ICP 13);

  - the limited review on *Data protection* to remind of obligations under the Commission rule concerning the timely completion and publication of records published in the DPO register, and to continuing to provide instructions and guidance (ICP 13);

- Follow-up of the DG TRADE Staff Action Plan following the final results of the 2023 Corporate Staff Survey (ICP 3, ICP 4, ICP 5, ICP 14).

- Introduction of an IT tool to monitor legal deadlines (ICP 12).

The other improvements and remedial measures envisaged are:

- Implementation of the Action Plan following a very important recommendation made by the IAS on the audit on *IT security risk management at the Commission* related to the IT security risk management methodologies and tools (ICP 11).

- Implementation of the Action Plans following other recommendations made by the IAS on the audits regarding:
  - *Implementation of bilateral trade agreements* on the assessment of the feasibility of establishing timelines for handling market access complaints (ICP 3);
  - *IT security risk management at the Commission* on the IT security monitoring and reporting (ICP 11, ICP 13).

- Implementation of the recommendations from the ECA's special reports on:

  - *Screening foreign direct investments (FDI) in the EU* to assess whether national screening mechanisms comply with regulatory standards and to streamline concepts across EU screening mechanisms (ICP 3);
  - *Trade defence instruments (TDI)* to improve monitoring by carrying out an assessment to estimate the overall effectiveness of trade defence measures (ICP 12).

- Revision and implementation of the DG TRADE Staff Action Plan following both the 2023 and 2025 Corporate Staff Surveys (ICP 3, ICP 4, ICP 5, ICP 14).

- Update of Finance and Strategic Planning Manual and checklists (ICP 3, ICP 12).

ANNEX 9: Specific annexes related to "Control results" and “Assurance: Reservations”

A. Annex related to "Control results" - Table X: Estimated risk at payment and at closure

Table X: Estimated risk at payment and at closure

DG TRADE -1	Payments made (2025;MEUR) -2	minus new prefinancing [plus retentions made] (in 2025;MEUR) -3	plus cleared prefinancing [minus retentions released and deductions of expenditure made by MS] (in 2025;MEUR) -4	Relevant expenditure (for 2025;MEUR) -5	Detected error rate or equivalent estimates -6	Estimated risk at payment (2025;MEUR) -7	Adjusted Average Recoveries and Corrections (*adjusted* ARC; %) -8	Estimated future corrections [and deductions] (for 2025;MEUR) -9	Estimated risk at Closure (2025;MEUR) -10
RCS 1 - Procurement	15.77	- 0.20	0.52	16.08	0.00% - 0.50%	0.00 - 0.08	0.00% - 0.00%	0.00 - 0.00	0.00 - 0.08
RCS 1 - Administrative expenditure	3.98	0.00	0.00	3.98	0.00% - 0.50%	0.00 - 0.02	0.00% - 0.00%	0.00 - 0.00	0.00 - 0.02
RCS 2 - Contributions to International organizations	4.35	- 4.26	2.06	2.16	0.00% - 0.50%	0.00 - 0.01	0.00% - 0.00%	0.00 - 0.00	0.00 - 0.01
DG total	**24.10**	**- 4.46**	**2.58**	**22.22**		**0.00 - 0.11**	**0.00% - 0.00%**	**0.00 - 0.00**	**0.00 - 0.11**
					Overall risk at payment in %	**0.00% - 0.50%** *(7) / (5)*		**Overall risk at closure in %**	**0.00% - 0.50%** *(10) / (5)*

Notes to the table X

(1) Relevant Control Systems differentiated per relevant portfolio segments and at a level which is lower than the total.

(2) Payments made after the preventive (ex-ante) control measures have already been implemented earlier in the cycle. For Cross-SubDelegations (Internal Rules Article 12), the reporting remains with the Delegating departments. (3) New pre-financing actually paid by out by the department itself during the financial year (i.e. excluding any pre-financing received as a transfer from another department). as per note 2.5.1 to the Commission annual accounts thus excluding "Other advances to Member States" which are covered on a purely payment-made basis (note 2.5.2). Pre-financing paid/cleared" are always covered by the Delegated departments, even for Cross-SubDelegations.

(4) Pre-financing actually cleared during the financial year (i.e. their 'delta' in the Financial Year 'actuals', not their 'cut-off' based estimated 'consumption').

(5) For the purpose of equivalence with the ECA's scope of the EC funds with potential exposure to legality & regularity errors (see the ECA's Annual Report methodological annex 1.1), our concept of "relevant expenditure" includes the payments made, subtracts the new pre-financing paid out [& adds the retentions made], and adds the pre-financing actually cleared [& subtracts the retentions released; and any deductions of *expenditure made by MS*] during the FY. This is a separate and 'hybrid' concept, intentionally combining elements from the budgetary accounting and from the general ledger accounting.

(6) In this column, we disclose the detected error rates or equivalent estimates. As DG TRADE carries out only ex ante controls and no ex-post control function is established, no further corrections to the expenditure are expected and the estimated future corrections are thus set at 0%. Consequently, for the risk at payment and risk at closure, DG TRADE is using the Commissions' flat rate of 0,5% as a conservative estimate for low-risk type of expenditure

(8) Even though to some extent based on the 7 years historic Average of Recoveries and financial Corrections (ARC), which is the best available indication of the corrective capacity of the ex-post control systems implemented by the DG over the past years, the AOD has adjusted this historic average from 0.02% to 0% given that: 1) the recoveries were mainly linked to recovery of pre-financing and not to corrections; 2) all transactions are subject to an independent ex-ante financial verification (100% of transactions); 3) and that no ex-post function is set up.

(9) RCS 1 – Procurement - covers/includes administrative expenses related to missions, meetings of committees and expert groups, previously reported by the PMO. More information can be found in Annexes 6 and 7.

B. Reservations

Not applicable.

ANNEX 10: Reporting – Human resources, digital transformation and data management, and sound environmental management

Human Resource management

Objective: DG TRADE employs a skilled, diverse and motivated workforce to deliver on the Commission's priorities		
Indicator 1: Percentage of female middle managers **Source of data:** SYSPER		
Baseline (2024)	**Target** (2029)	**Latest known results** (situation on 31/12/2025)
36%	attain at least 50%	38,7%
Indicator 2: Staff engagement index ([18]) **Source of data:** Commission staff survey		
Baseline (2023)	**Target ([19])** (2029)	**Latest known results** (situation on 31/12/2025)
73%	maintain or increase	1. New Staff Engagement Index (2025): 78% 2. Old Staff Engagement Index (2023): -1 pp

Main outputs in 2025:			
Description	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
	Number of courses/lunch time sessions	10	36

([18]) A new method of measuring staff engagement was introduced in 2025. The new Staff Engagement Index provides a more comprehensive view of staff engagement covering purpose, pride and motivation, autonomy and growth and collaboration and trust. The old Staff Engagement Index, which focused more on job content and relations with immediate colleagues and manager, will be used exclusively for comparisons with past data.

([19]) The Commission baseline score for the Staff Engagement Index is 73% (based on the 2023 staff survey results).

Description	Indicator	Target	Latest known results (situation on 31/12/2025)
Training initiatives and learning programmes adapted to trade and economic security policy	Average number of participants in the WTO Law courses	On average 15 participants	2 WTO courses with 10 participants from DG TRADE/21 participants including participants from other DGs on average
Training sessions and awareness raising actions for managers and pre-managers, including for female candidates	Number of training sessions (incl. coaching) and awareness raising	4	11
Training sessions and awareness raising actions on diversity and inclusion	Number of events	2	2
Action plan following-up on the staff opinion survey 2023	Number of actions implemented	Implement 10 actions planned for 2025 in the action plan	11
Health or well-being events	Number of BE WELL events	6	7
	Average number of participants in the workshops organised during these events	An average of 5-10 participants in each workshop	29
Internal communication: regular debriefings for staff on major policy initiatives to ensure staff are well informed of the latest developments in trade policy and major Commission initiatives	Number of debriefings	10	10, four on general policy and reorganisation, six Trade@12 on various trade related issues
Daily accessible Trade Press Review to inform staff of how trade issues are reported in the media and what DG TRADE staff in HQ and delegations are working on	Number of working days on which the Daily Trade Press Review is issued	All working days except during the summer break and last days of December as well as first days of January	Achieved

Digital transformation and data management

Objective: DG TRADE is using innovative, trusted digital solutions for better policymaking, data management and administrative processes to build a digitally transformed, user-focused and data-driven Commission			
Indicator 1: Digital Culture: % of statutory staff that has completed at least one IT training course ([20]) **Source of data:** Digital Commission Dashboard (data measured at DG-level)			
Baseline (2024)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (situation on 31/12/2025)
20%	30%	40%	25%
Indicator 2: Seamless digital environment: cloud adoption – % of IT systems utilising cloud infrastructure services compared to the total number of IT systems **Source of data:** Digital Commission Dashboard (- data measured at DG-level)			
Baseline (2024)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (situation on 31/12/2025)
0%	40%	90%	3% ([21])
Indicator 3: Maturity level in implementing corporate data policies across four key areas: data management, ownership and responsibilities, data quality, and data skills (basic, developing, established, advanced, or trendsetting). **Source of data:** DG TRADE			
Baseline (2024)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (situation on 31/12/2025)
Developing	Established	advanced	Developing

([20]) This KPI will be accompanied by an informative package that will be shared in AAR templates on a yearly basis. The package will include: (i) link to implementing guidelines – list of training courses available in EU Learn; and (ii) dedicated instructions on how to register a new training course in EU Learn (when this is organised at DG level directly by the DG), in order to record the actual number of participants and sessions.

([21]) All new projects are cloud based (e.g Forced Labour). The relatively low figure is explained by the fact that main DG TRADE IT systems are sensitive and sensitive non classified information (SNC) Cloud became available only recently. Migration to SNC Cloud will take place in 2026 and is schedule to be completed by October 2026. This will significantly increase cloud adoption in DG TRADE.

Indicator 4: Compliance indicator ([22]): percentage of staff trained on data protection compliance combined with the percentage of public records of processing operations reviewed within the last two years. **Source of data:** DG TRADE			
Baseline (2024)	**Interim milestone** (2027)	**Target** (2029)	**Latest known results** (situation on 31/12/2025)
75%	90%	100%	75%

Main outputs in 2025:

Digital transformation

Output	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Digital Culture Increase use of corporate collaborative tools.	Average number of active users using Teams	95%	99%
Increase level of cybersecurity awareness.	Average participation rate in Cyber Awareness training (per department)	25%	34%
Digital-Ready EU policymaking Increase digital readiness.	% of statutory personnel that has followed the digital-ready policymaking course on EU Learn	5%	1%
Business-driven Digital Transformation Concentrate data assets in data warehouse.	Cumulative total of data assets in the data warehouse	15	19
Green, Resilient and Secure Digital Infrastructure Increase security of information systems.	Introduce double authentication in information systems	Target by 2025: 100%	100%, all SNC systems covered
List of key actions on information management and data protection	Deactivation of inactive users	Target by 2025: 100%	100%

([22]) The compliance indicator is calculated with a 50% weight attributed to the following two values: first, the number of public records with a publication date within the last 2 years / public records of the department. Second, the percentage of staff in the department who have attended data protection awareness-raising activities". The 100% staff awareness will be achieved in particular by the following actions : general and specific trainings on data protection issues for different staff categories (e.g. newcomers, senior and middle managers, data protection contact points, general staff), dedicated data protection space on DG TRADE's Intranet, various communication campaigns (e.g. newsletter, posters, banners, etc.), visits to Unit meetings by DG TRADE DPC to raise staff awareness.

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
Implementation of the corporate principles for data governance for DG TRADE's key data assets	Percentage of implementation of the corporate principles for data governance for DG TRADE's key data assets	Interim milestone by 2025: 80%	70% ([23])
Sharing information and knowledge with third parties (continuous)	Publish an information system aggregating information supporting imports and exports to the EU with special attention to SMEs	Q4 2025	A2M publishes information supporting imports and exports to the EU with focus on SME; albeit with limitations on exports.
Managing information and knowledge within DG TRADE (continuous)	Operate a Data Warehouse integrating the statistical data supporting negotiations and trade defence cases taking into account the Data Strategy and data catalogue initiatives. Continue to operate a Service Desk supporting DG TRADE's information systems which complements, in the field of information systems, the corporate service desk. Operate a One-stop Shop for collaboration spaces	Q4 2025	The Data Warehouse was fully operational in 2025 and continued to integrate statistical data supporting trade negotiations and trade defence cases, in line with the Data Strategy and data catalogue initiatives. The DG TRADE Service Desk continued to operate throughout 2025, providing dedicated support for DG TRADE information systems and effectively complementing the corporate service desk for system-specific matters. A One-stop Shop for collaboration spaces was operational in 2025, based on a secure SharePoint environment, enabling controlled access to collaboration spaces and supporting secure information sharing within DG TRADE.

([23]) DG TRADE currently maintains a 70% compliance rate regarding Corporate Principles for Data Governance. This score reflects a strong technical foundation particularly within the QUASAR and LSA services. The score is offset by ongoing efforts to formalize administrative frameworks. While the 80% objective has not yet been fully met, the infrastructure for our key data assets is mature, and a roadmap for full alignment is currently in execution.

Output	Indicator	Target	**Latest known results** (situation on 31/12/2025)
Using innovative, trusted digital solutions	Degree of implementation of the digital strategy principles by the most important IT solutions	60%	66%
Initiative supporting business transformation	Create at least one new entry in the information spaces at Directorate or Unit level	Q4 2025	Achieved

Data management

Output	Indicator	Target	**Latest known results** (situation on 31/12/2025)
Handling email registration in Ares	Number of emails registered with AresLook	Maintaining the proportion of one-third of the total documents registered in Ares	38.9%
Monitoring of the use made by all DG TRADE departments	Reporting of open tasks in ARES sent to all departments	10 times/year	10
Better use of electronic workflows, with the reduction of errors caused by the double circulation and the reduction of paper storage	Number of Ares registered documents with a fully approved e-signatory (no paper circulation in parallel).	=/> 95% of registered documents approved in full electronic mode (without paper signatories circulation)	98.9%

Data protection

Output	Indicator	Target	**Latest known results** (situation on 31/12/2025)
Awareness raising activities on data protection and ensuring up-to-date data protection record keeping	Share of staff trained on data protection principles combined with share of data protection records no older than 2 years	100%	75%
Ensuring accurate and complete record keeping of all data processing operations carried out in DG TRADE with special attention for high-risk operations	Number of Data Protection Management System records compared to the number of actual data processing operations	100% coverage	100%

Output	Indicator	Target	Latest known results (situation on 31/12/2025)
All security controls at departmental level and IT system's priority controls will be subject to a compliance attest in GRC.	Number of attested GRC controls	100% for MFA and IT systems priority controls	100%

Sound environmental management

Objective: Reaching climate neutrality by 2030 and a reduced environmental footprint for the Commission.		
Indicator: % reduction in emissions from staff professional travel (t CO2eq). **Source of data:** DG/department emissions report from Mips+		
Baseline (2019)	**Target** (2030)	**Latest known results** (situation on 31/12/2025)
5 065.48	50% of reduction (baseline 2019)	46% of reduction (baseline 2019)

Main outputs in 2025:

Description	Indicator	Target	Latest known results (situation on 31/12/2025)
Awareness raising actions on the need to reduce DG TRADE's emissions in professional travel	Number of events	2	2
Participation in corporate energy saving actions through building closure.	Number of department's buildings participating in: - end of year energy saving action - summer energy saving action	100% of department's buildings participating in - end of year energy saving action (DG TRADE always willing to participate, but shares the building with other DGs) - summer energy saving action [two weeks if possible for the building] DG TRADE always willing to close for 2 weeks, depends on other DGs in the building	DG TRADE offered to participate in both building closures, but other DGs in the building needed the building to remain open.

Description	**Indicator**	**Target**	**Latest known results** (situation on 31/12/2025)
Green events	Number of green events	2 – DG TRADE will continue to participate in corporate campaigns such as the collection of electrical appliances and textiles	DG TRADE participated in the end-of-year campaign to collect electrical appliances for Recupel.
Gradual introduction of GPP criteria in contracts and starting to monitor the process.	% of contracts with "green" provisions	Increase, in comparison to previous year, in the % of contracts with "green" provisions	100%
Awareness actions in the framework of EMAS corporate campaigns on (for instance): - Energy and water use - Paper consumption - Digital mindfulness - GPP – biodiversity - Waste reduction/sorting Mobility	Number of awareness/participatory actions Number of staff informed	100% 100%	DG TRADE informs staff through posts on the intranet to ensure all staff is informed of ongoing actions.

ANNEX 11: Implementation through non-EU entrusted entities ([24]) and/or through EU Trust Funds

A. Programme(s) concerned

In 2025, DG TRADE signed contribution agreements with international organisations financing actions in the area of external trade relations (including access to the markets of third countries and initiatives in the field of trade related assistance) – budget article 14 20 04 02 – and by virtue of tasks resulting from the Commission's prerogatives at institutional level pursuant to the Treaty on the Functioning of the European Union.

The total signed contribution agreements (9) was for a total amount of EUR 3 244 759,40. These actions are implemented under indirect management.

B. Justification of the recourse to Indirect Management

DG TRADE examines the relevance and feasibility of the delegated measure for the EU, the partner country and the delegatee. It analyses whether the delegated measure contributes to the strengthening or rationalisation of a wider division of labour process, whether it is coherent with the EU strategies and programming documents, it assesses its impact as regards EU visibility, the cost-benefit/impact ratio and the likely risks and disadvantages of the measure.

C. Justification of the selection of the bodies (identity, selection criteria, possible indication in the legal basis, etc.)

Pursuant to Article 62(1)(c)(ii) FR, when acting as indirect management delegatee, the international organisation is an international public sector organisation set up by an international agreement or a specialised agency set up by such organisation. Such an international organisation may have worldwide or regional scope. The typical feature of international organisations is their specialisation in certain activities relevant for the EU's objectives. This specialisation, along with the capacity to provide cofinancing (its own or from other donors) is the primary reasons for selecting a certain organisation as delegatee.

The selected international organisations were selected based on their neutrality, international mandate or coverage, specific expertise and on the fact of having been pillar assessed and meeting the conditions of Art 156 of the Financial Regulation.

Moreover, with regard to the delegatee, it is assessed whether it has the technical and financial management capacity to implement the delegated measure, on the basis of international track record, sectors of intervention and project pipeline, whether it provides comparative advantages and whether it has significant and sustainable involvement in the relevant programme or sector.

([24]) Implementing partners other than EU institutions or Union bodies.

D. Summary description of the implementing tasks entrusted to these bodies

For the delegatee, being the contracting authority, implies carrying out the following budget implementation tasks: managing and enforcing the contracts concluded (making payments, accepting or rejecting deliverables, enforcing the contract, carrying out checks and controls, recovering unduly paid funds), and also running the procurement and grant procedures preceding the conclusion of such contracts, including the award and rejection decisions.

E. List of national and international implementing entities in 2025

The table below provides for each commitment the references and the amounts and duration of the contribution agreements concerned.

Nbr Contract	ID (Budgetary commitment)	Partner	Summary description of the implementing tasks entrusted to these bodies	Contracted Amount in 2025 (EUR)	Paid Amount in 2025 (EUR) (first pre-financing)	Duration of the delegation	Pillar assessed
1	4500149162	WORLD TRADE ORGANIZATION (WTO)	EU Contribution to the WTO Global Trust Fund for technical assistance activities in 2026 and 2027 - TRADE/2025/A1/A01 - PO4500149162 The EU continues contributing to the WTO's Technical Assistance and Training Plan (2026-2027) via the contribution to the Global Trust Fund (GTF). The support to the GTF is an important element of the EU's assistance programmes in the field of trade. The main emphasis is on fostering a sustainable economic, social and environmental development, focusing on green and inclusive growth, with emphasis on Least Developed Countries and Africa. The funding will allow the organisation of training activities, in particular covering costs of consultants, venue, travel, daily allowance, training material etc. This project will be a continuation of a currently ongoing project implemented by the WTO	1,000,000	450,000	24 months	No [25]
1	4500145764	WORLD TRADE ORGANIZATION (WTO)	EU contribution to the WTO Trust Fund – LDCs participation in the 14th WTO Ministerial Conference (MC14) - TRADE/2025/A1/A03 - PO 4500145764 The contribution to the WTO Trust Fund will support the participation of representatives of Least Developed Countries (LDC) in the WTO Ministerial Conference that is planned to take place in 2026. LDC participation helps to strengthen their involvement in the multilateral trading system. The funding will allow to cover the travel and accommodation expenses of LDC participants attending the Ministerial Conference.	75,000	67,500	12 months	No [26]

[25] and [26] The pillar assessment is still ongoing. DG INTPA is leading the process with WTO. Until these pillars are assessed positively, DG TRADE (with the received approval from DG BUDG) continues to add supervisory measures in the agreements and considers them to be adequate and sufficiently mitigating any potential risk.

1	4500119724	ORGANISATION FOR ECONOMIC CO-OPERATION (OECD)	Implementation investment facilitation for lasting development in ECOWAS Ivory Coast - TRADE/2025/B3/B03 - PO 4500119724 Investment promotion and facilitation provisions seeking to mobilise sustainable investment are appearing with increased frequency in international investment agreements. By encouraging states to adopt conducive measures at the domestic level, such provisions aim to support parties in establishing an attractive investment climate in their territories. The purpose of the project is therefore to support the implementation of provisions on investment promotion and facilitation under the framework of the Investment Protocol to the African Continental Free Trade Agreement (AfCFTA) and the WTO Investment Facilitation for Development (IFD) Agreement, with a view to maximising their potential contribution to sustainable investment. To do so, this project will build on the projects already concluded by the OECD, however it would warrant deeper analysis in relation to specific countries, in particular in Africa.	200,000	84,924.80	28 months	Yes
1	4500141593	ORGANISATION FOR ECONOMIC CO-OPERATION (OECD)	Implementing commitments on investment facilitation for lasting development in Ghana - TRADE/2025/B2/B3 - PO 4500141593 Investment promotion and facilitation provisions seeking to mobilise sustainable investment are appearing with increased frequency in international investment agreements. By encouraging states to adopt conducive measures at the domestic level, such provisions aim to support parties in establishing an attractive investment climate in their territories. The purpose of the project is therefore to support the implementation of provisions on investment promotion and facilitation under the framework of the Investment Protocol to the African Continental Free Trade Agreement (AfCFTA) and the WTO Investment Facilitation for Development (IFD) Agreement, with a view to maximising their potential contribution to sustainable investment. To do so, this project will build on the projects already concluded by the OECD, however it would warrant deeper analysis in relation to specific countries, in particular in Africa.	200,000	84,924.80	28 months	Yes

1	4500121293	ORGANISATION FOR ECONOMIC CO-OPERATION (OECD)	Responsible supply chains in the garment and footwear sector - NUMBER: EC-TRADE/2025/C4/C04 + PO N° N° 4500121293 The overall objective is to promote the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector and to support the capacity of EU and non-EU companies to carry out due diligence, and of governments to create the appropriate enabling policy environment. The project also has a proven record of fostering stakeholders' dialogue on key due diligence issues at the high-profile annual forum, and to carry out research on emerging topics. This project will be a continuation of a currently ongoing project implemented by the OECD	800,000	338,986.67	24 months	Yes
1	4500143234	ORGANISATION FOR ECONOMIC CO-OPERATION (OECD)	Global Forum on Steel Excess Capacity (GFSEC) - TRADE/2024/E3/E03 - TRADE/2025/E4/E04 - PO 4500143234 A contribution to the OECD in support of the functioning of a Global Forum on Steel Excess Capacity, as commissioned by the G20 Summit in September 2016. The overall objective of this action is to continue contributing to the preparation of regular reports for the Global Forum on Steel Excess Capacity members and interim progress reports to relevant international bodies and G20, as well the maintenance of the internal information-sharing mechanism that was developed in a previous action, and the facilitation of the review process. In addition, the continuation of the project on the transparency work and peer review process is essential in facilitating global solutions avoiding further crisis arising from overcapacity in the steel sector. The OECD plays a central role in the process as a facilitator and provides essential support throughout the project. The recent evaluations have shown that the project is delivering in accordance with the objectives	119,759.40	95,807.52	12 months	Yes

1	4500136230	International Trade Centre (ITC) - with bank account of United Nations (UN)	Implementation of self-assessments for the WTO Investment Facilitation for Development (IFD) Agreement - TRADE/2025/B2/B02 - PO 4500136230 With the conclusion of the Investment Facilitation for Development Agreement (IFD), the participating WTO members are now starting to prepare for its implementation. The EU has been actively providing support for the implementation, demonstrating a strong commitment to the WTO IFD's development objective. This project is a part of the implementation process. The main objective of this action is to carry out a number of self-assessments with developing and least-developed countries. It includes pre-assessment capacity building on understanding the implications of IFD Agreement, organizing in-country assessment workshops, as well as helping to support preparation and notification of the categorization of provisions (categories A, B and C), including technical assistance and capacity-building needs (category C), to the WTO. The expected result is that the developing and least developed countries will be able to notify the categorisation of provisions in the WTO-IFDA (under categories A, B and C) to the WTO, as well as articulate their need for technical assistance and capacity-building. Over 30 WTO members have requested for such support.	600,000	300,000	22 months	Yes ([27])
1	4500140801	International Trade Centre (ITC) - with bank account of United Nations (UN)	Applying a gender lens to WTO agreements and work - developing a practical step-by-step guide - EC-TRADE/2025/C4/C06 – PO 4500140801 The main objective is to develop a very practical step-by-step guide for negotiators who are interested in mainstreaming gender equality in WTO agreements and work, but not necessarily gender experts. To that end, the guide would be discussed with the relevant stakeholders, such as the members of the Informal Working Group on trade and gender, also small roundtable discussions with trade negotiators will be organised, in addition a webinar with the aim to disseminate the step-by-step guide to a wider audience is foreseen. The guide will be a contribution to one of the work pillars of the Informal Working Group on trade and gender, which builds on the 2017 Buenos Aires Declaration on Trade and Women's Economic empowerment in particular applying a "gender lens" to trade and investment agreements)	150,000	120,000	18 months	Yes ([28])

([27]), ([28]) and ([29]) To be noted that these ITC and UNCITRAL rely on the pillar assessment of the United Nations Secretariat (UNS). DG TRADE applied supervisory measures to them in contribution

1	4500131076	United Nations Commission on International Trade Law (UNCITRAL)	Enhancing Constructive Dialogue and Active Involvement in Advancing the Mandate of UNCITRAL Working Group III on ISDS Reform - TRADE/2025/F3/F05 - PO 4500131076 The main objective of this project is ensuring the constructive and active participation and engagement of United Nations Member States, in particular developing countries, in UNCITRAL Working Group III on ISDS reform. The planned activities within this project are based on two pillars: consensus-building activities focused on specific reform options to increase awareness and participation in the meetings, and facilitation of participation in these meetings by financially facilitating travels of developing countries delegates. The high level of participation of the developing and least developed countries is a direct outcome of the projects previously financed by the EU.	100,000	100,000	14 months	Yes ([29])
9			Sub-total (contribution agreements signed in 2025)	3,244,759.40	1,642,143.79		

Nbr Contract	ID (Budgetary commitment)	Partner	Summary description of the implementing tasks entrusted to these bodies	Contracted Amount in 2025 (EUR)	Paid Amount in 2025 (EUR)	Duration of the delegation agreement	Management declaration (MD)/ Financial Report (FR)
Files contracted in previous years	4500063020	International Trade Centre (ITC) - with bank account of United Nations (UN)	3rd Prefinancing on file TRADE/2024/C4/C06 with ITC: Building understanding and participation of developing countries in the green economy	-	1,107,826	48 months	YES - YES
	4500061638	INTERNATIONAL LABOUR ORGANIZATION (ILO)	2nd Prefinancing on the file TRADE/2023/C4/C05 - ILO - Trade for decent work 2.0 : 2024 -> 2027	-	935,275.70	48 months	NO - YES
	4500058335	WORLD TRADE ORGANIZATION (WTO)	2nd Prefinancing on the file TRADE/2023/A1/A01 - Contribution to the WTO Doha development Agenda Global Trust Fund for technical assistance during 2024 and 2025	-	450,000	24 months	YES - YES
	4500062820	ORGANISATION FOR ECONOMIC CO-OPERATION (OECD)	3rd Prefinancing on the file TRADE/2022/C4/C10 - Responsible supply chains in the gartment and footware sector (phase V)	-	121,606.61	30 months	YES - YES

agreements due to the negative assessment of two pillars (8 and 9). DG TRADE will continue applying these mitigating actions until ITC and UNCITRAL finalise the implementation of the agreed improvements.

	4500059682	ORGANISATION FOR ECONOMIC CO-OPERATION (OECD)	Final payment on the file TRADE/2023/B3/B02 - Integrating principles of FDI qualities into future treaty provisions on sustainable investment	-	37,000	18 months	YES / YES
	4500064905	WORLD HEALTH ORGANIZATION (WHO)	Final payment on the file TRADE/2016/D3/D14: Contribution to FAO/WHO Codex Trust Fund 2017-2019 + TRADE/2019/D3/D15: Contribution to FAO/WHO Codex Trust Fund 2020 - 2023	-	30,000	90 months	YES / YES
	4500057286	ORGANISATION FOR ECONOMIC CO-OPERATION (OECD)	Final payment on the file TRADE/2023/E3/E02 - Global Forum on steel excess capacity	-	19,960	12 months	YES / YES
	4500058104	WORLD TRADE ORGANIZATION (WTO)	Final payment on the file TRADE/2023/A1/A03 - WTO Trust Fund - LDC Particicpation MC13	-	7,500	12 months	YES / YES
			Sub-total (contribution agreements signed before 2025)	-	2,709,168.31		
			Grand Total	3,244,759.40	4,351,312.10		

ANNEX 12: EAMR of the Union Delegations

Not applicable.

ANNEX 13: Decentralised agencies and other Union bodies

Not applicable