

Brussels, 3.11.2025  
C(2025) 6426 final

**COMMUNICATION TO THE COMMISSION**

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

**2025 Annual report**

## **COMMUNICATION TO THE COMMISSION**

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

#### **2025 Annual report**

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

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

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

To meet this requirement, Section 1 of the annual report sets out the criteria that the Commission has used to ensure the correct implementation of Article 16, paragraph 3, and Section 2 sets out an analysis of the occupational activities declared by former senior officials of the Commission in 2024. The annex to the report summarises the Commission decisions taken under Article 16 regarding its former senior officials.

This is the 11th annual report published by the Commission, in line with its obligations under the fourth paragraph of Article 16 of the Staff Regulations.

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

<sup>2</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

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

### **1.1. Definition of senior officials**

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

- Directors-General or Deputy Directors-General (including officials that were called upon to occupy temporarily such posts in line with Article 7(2) of the Staff Regulations) and ‘Hors Classe’ Advisers who exercised these functions at any time during the last three years before they left the service;
- Directors (including officials that were called upon to occupy temporarily such a post in line with Article 7(2) of the Staff Regulations) and Principal Advisers who exercised these functions at any time during the last three years before they left the service;
- Heads of Cabinet who exercised this function at any time during the last three years before they left the service.

### **1.2. Definition of lobbying and advocacy**

Activities giving rise to lobbying or advocacy are defined in the Transparency Register set up under the Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission of 20 May 2021<sup>3</sup> (see its Article 3 ‘Activities covered’ and its Article 4 ‘Activities not covered’) and the Commission Decision on transparency measures concerning meetings held between Commission staff holding management functions and interest representatives<sup>4</sup> (see its Article 2).

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

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

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

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<sup>3</sup> Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register.

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

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

### 1.3. Temporal scope

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

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

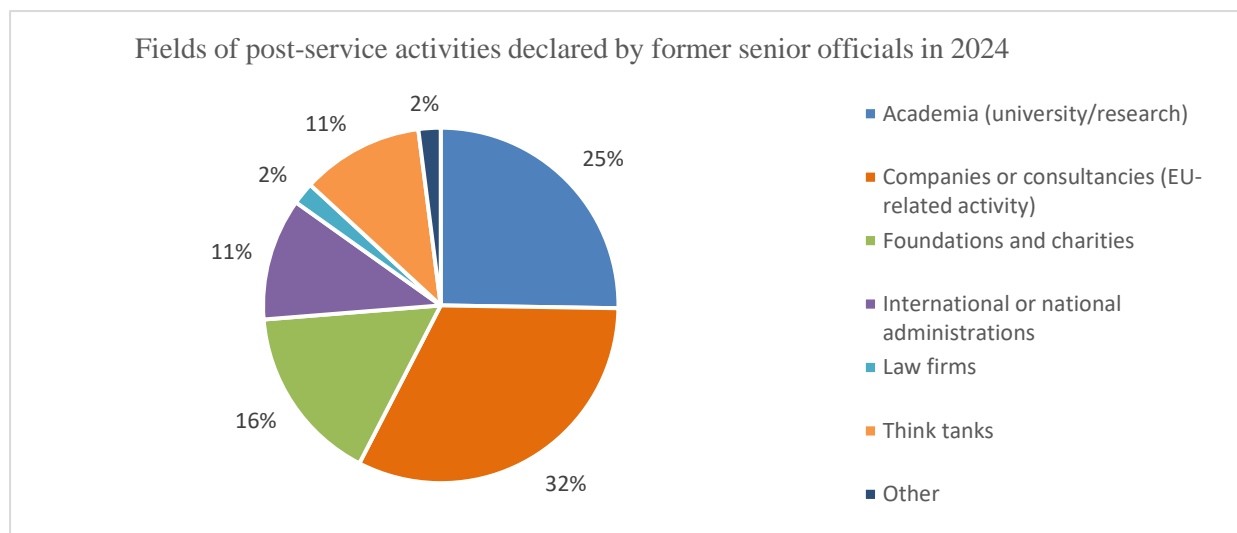
The Commission's Directorate-General for Human Resources and Security (DG HR) receives the declaration from former Commission staff members. DG HR then collects views of the department(s) in which the former senior officials worked during the last three years of service, the respective cabinet(s), the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

## 2. Analysis

### 2.1. Occupational activities declared by former senior officials in 2024

In 2024, 17 former Commission senior officials declared 44 post-service activities in accordance with Article 16 of the Staff Regulations.

For the purposes of reporting and statistical analysis over time, the 44 declared post-service activities have been categorised within seven distinct fields, as illustrated in the pie chart below<sup>5</sup>.



### 2.2. Occupational activities falling within the scope of this report

<sup>5</sup> The percentages presented have been rounded to the nearest whole number. As a result, the total does not sum exactly to 100%, but here amounts to 99%.

Of the 44 post-service activities declared by former senior officials in 2024, 5 fell outside the relevant 12-month period.

Of the remaining 39 activities, 21 were considered to potentially give rise to lobbying or advocacy directed at staff of the former senior officials' institution on matters for which they were responsible during their last three years of service. The Appointing Authority decided to prohibit 2 of those 21 activities.

The Appointing Authority authorised the other 19 post-service activities on condition that, for at least 12 months after leaving the service, the former senior officials concerned would not engage in lobbying or advocacy directed at Commission staff on matters they had been responsible for during their last three years of service. On one occasion a prohibition to engage in lobbying and advocacy was imposed for a period of 24 months. The Appointing Authority considered it plausible and feasible to exercise the activities in a meaningful manner and in full respect of this condition. Additionally, the Appointing Authority imposed other restrictions and conditions on those activities with due respect to the right to work of the individuals concerned and the principle of proportionality. Finally, one of these 19 post-service activities which were authorised by the Appointing Authority under the abovementioned conditions was eventually not undertaken by the concerned former senior official, who informed the institution thereof.

On this basis, and given that one Appointing Authority's decision covered 4 activities, this report includes a summary of 15 decisions relating to the 18 activities that were actually undertaken.

### 2.3. Occupational activities falling outside the scope of this report

The Appointing Authority prohibited one of the activities falling outside the scope of this report. The reasons were not related to lobbying or advocacy risks but to protect other interests of the Commission.

The Appointing Authority imposed proportionate restrictions, where appropriate, for 5 activities that fell outside the relevant 12-month period and for 18 that did not involve, or potentially involve, lobbying or advocacy. These included limitations on professional contacts with former colleagues, prohibition on handling certain files, and requirements to uphold the duties of discretion and confidentiality.

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

## 3. Conclusion

The table below summarises the analysis presented in Part 2 of this report:

<b>44 post-service activities were declared by 17 former senior Commission officials in 2024, out of which:</b>	
<b>21 activities were considered as potentially giving rise to lobbying or advocacy:</b>	
	<i>2 activities prohibited</i>
	<i>18 activities authorised subject to restrictions and covered by 15 AA decisions</i>
	<i>1 activity not undertaken</i>
<b>18 activities were considered as not involving lobbying or advocacy, out of which:</b>	
	<i>1 activity prohibited for reasons unrelated to lobbying or advocacy risks</i>
<b>5 activities were considered as falling outside the temporal scope of the report</b>	

The annex to this report summarises the 15 decisions taken under the third paragraph of Article 16 of the Staff Regulations on the 18 post-service activities that were going to be performed within 12 months after leaving the service and were actually undertaken.

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

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

## **ANNEX - Summary of relevant decisions by the Appointing Authority in 2024:**

**1.**

### **CONCERNS**

Mr John CLARKE

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

End of service: 30 September 2023

### **NEW ACTIVITY**

Special Adviser at Foresight International Policy and Regulatory Advisors International SRL (FIPRA), Brussels, Belgium.

Provide services to corporate clients in a broad range of policy areas, including healthcare, life sciences and well-being, green transition, digital and tech, transport, travel and logistics, international trade and competition.

### **DECISION**

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

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No professional contacts with Commission staff.
- No advising or working on files or matters he handled during his last 3 years of service.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Report every 6 months on compliance with the third condition above.
- Make restrictions and obligations transparent to FIPRA and its clients.

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**2.**

### **CONCERNS**

Mr Ignacio GARCIA BERCERO

Former Director in the Directorate-General for Trade (DG TRADE)

End of Service: 31 March 2024

### **NEW ACTIVITY**

Non-Resident Fellow at Bruegel in Brussels.

Contribute to Bruegel's research and write papers, in particular on trade policy.

## **DECISION**

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

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts with DG TRADE staff and related Cabinet, and with other Commission services which were or are involved in policy files that fell under his responsibility during the last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission for Bruegel.

Additionally:

- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
  - Clarify he does not represent the position or interests of the Commission.
  - Make restrictions and obligations transparent to Bruegel.
- 

## **3.**

### **CONCERNS**

Mr Michael KOEHLER

Former Deputy Director-General in the Directorate-General for European Civil Protection & Humanitarian Aid Operations (DG ECHO)

End of Service: 31 January 2024

### **NEW ACTIVITIES**

Advisory Board Member of:

- Positive Agenda Advisory in Rabat, Morocco
- The Polisync Centre for International Policy Engagement in Geneva, Switzerland
- The Candid Foundation GmbH in Berlin, Germany
- The Deutsche Welthungerhilfe eV in Bonn, Germany

## **DECISION**

The Appointing Authority approved Mr. KOEHLER's activities with these conditions:

For 12 months after leaving the service:

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



For 2 years after leaving the service:

- No professional contacts with staff of DG ECHO, the Cabinet for Crisis Management, DG INTPA and DG NEAR and with other Commission services, involved in policy files, operations or financial procedures that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission for specified organizations or their clients.

Additionally:

- Clarify he does not represent the position or interests of the Commission.
  - Avoid advising and working on files and matters he was personally and substantially involved in and that rely on non-public information.
  - Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
  - Make restrictions and obligations transparent to the specified organisations and their clients, where relevant.
- 

#### **4. CONCERNS**

Mr Michael KOEHLER

#### **NEW ACTIVITY**

Senior Associate Fellow at the Egmont Institute – Royal Institute of International Relations, in Brussels, Belgium

Conduct research on foreign policy and aid

#### **DECISION**

The Appointing Authority approved Mr. KOEHLER's activity subject to the following conditions:

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts with staff of DG ECHO, the Cabinet for Crisis Management, and other Commission services, including DG INTPA, involved in policy files, operations or financial procedures that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission Egmont Institute.

Additionally:

- Clarify he does not represent the position or interests of the Commission.

- Avoid advising on specific files or matters he previously worked on, and which involve non-public information, especially in humanitarian policy.
  - No advising the Egmont Institute on files or matters, in particular, in the field of humanitarian policy (such as Education in Emergencies, the Grand Bargain implementation, response to humanitarian crises, as well as Linking Relief, Rehabilitation and Development and the Humanitarian – Development Nexus), in which he had participated personally and substantially and that rely on non-public information.
  - Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
  - Make restrictions and obligations transparent to Egmont Institute.
- 

## **5.**

### **CONCERNS**

Mr Michael KOEHLER

### **NEW ACTIVITY**

Senior Associate Fellow at the European Institute of the Mediterranean (IEMed), Spain

Conduct think-tank and research work. IEMed coordinates the DG NEAR-funded EUROMESCO network of the Euro-Mediterranean institutes.

### **DECISION**

The Appointing Authority approved Mr. KOEHLER's activity subject to the following conditions:

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts with staff of DG ECHO, the Cabinet for Crisis Management, and other Commission services, including DG NEAR, involved in policy files, operations or financial procedures that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission for IEMed or EUROMESCO.

Additionally:

- Clarify he does not represent the position or interests of the Commission.
- Avoid advising on specific files or matters he previously worked on involving non-public information, especially in humanitarian policy.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.

- Make restrictions and conditions transparent to IEMed and EUROMESCO.
- 

**6.**

## **CONCERNS**

Mr Michael KOEHLER

## **NEW ACTIVITY**

Visiting Senior Fellow at the Overseas Development Institute (ODI), in London, UK

Conduct think tank and research work

## **DECISION**

The Appointing Authority approved Mr. Koehler's activity with these conditions:

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts with staff of DG ECHO, the Cabinet for Crisis Management, and other Commission services, in particular DG NEAR and DG INTPA, involved in policy files, operations or financial procedures that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission.

Additionally:

- Clarify he does not represent the position or interests of the Commission.
  - Avoid advising on specific files or matters he previously worked on involving non-public information, especially in humanitarian policy.
  - Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
  - Make restrictions and obligations transparent to ODI.
- 

**7.**

## **CONCERNS**

Mr Michael KOEHLER

## **NEW ACTIVITY**

Self-employed consultant at MK Consulting in Wezembeek-Oppem, Belgium

Provide general and strategic advice on foreign policy, energy policy, cooperation, international conflict mediation and risk management. Invoice for other services such as academic teaching, training activities or delivering speeches.

## **DECISION**

The Appointing Authority approved Mr. Koehler's activities with these conditions:

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts with staff of DG ECHO, the Cabinet for Crisis Management, DG NEAR and DG INTPA, and other Commission services and associated Cabinets, involved in policy files, operations or financial procedures that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission.
- No accepting as clients any beneficiary of DG ECHO funding for which he acted as Authorising Officer by Sub-Delegation during his last 3 years of service.

Additionally:

- Clarify he does not represent the position or interests of the Commission.
- Avoid advising on specific files or matters he previously worked on involving non-public information, especially in humanitarian policy.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Make restrictions and obligations transparent to clients.

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**8.**

## **CONCERNS**

Mr Michael KOEHLER

## **NEW ACTIVITY**

Associate Senior Advisor at the Centre for Humanitarian Dialogue (CHD), in Geneva, Switzerland

Provide general strategy advice and participate in confidential mediation and peacebuilding activities or mission in conflict regions, with a focus on Middle East and North Africa.

## **DECISION**

The Appointing Authority approved Mr. Koehler's activity with these conditions:

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts with staff of DG ECHO, the Cabinet for Crisis Management, DG NEAR and DG INTPA, and other Commission services involved in policy files, operations or financial procedures that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission.

Additionally:

- Clarify he does not represent the position or interests of the Commission.
  - Avoid advising CHD on specific files or matters he previously worked on involving non-public information, especially in humanitarian policy.
  - Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
  - Make restrictions and obligations transparent to CHD.
- 

## **9. CONCERNS**

Mr Michael KOEHLER

### **NEW ACTIVITY**

Member of the Advisory Board of Glocalshift, in Amsterdam, the Netherlands

Provide strategic advice on programming and development, and to assist in relations with Arab stakeholders

### **DECISION**

The Appointing Authority approved Mr. Koehler's activity with these conditions:

For 12 months after leaving the service:

- No lobbying and advocacy on behalf of Glocalshift, its clients and partner organisations, on matters for which he had been responsible during the last 3 years of service.

For 2 years after leaving the service:

- No professional contacts with staff of DG ECHO, the Cabinet for Crisis Management, DG NEAR and other Commission services involved in policy files that fell under his responsibility during his last 3 years of service.
- No advising or contributing to funding proposals to the Commission for Glocalshift, its clients and partner organisations.

Additionally:

- Avoid advising these entities on specific files or matters he previously worked on involving non-public information, especially in humanitarian policy.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Make restrictions and obligations transparent to Glocalshift, its clients and partner organisations.

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**10.**

## **CONCERNS**

Mr Henrik MORCH

Former Director at the Directorate-General for Competition (DG COMP)

End of Service: 30 June 2024

## **NEW ACTIVITY**

Equity Partner at Paul, Weiss, Rifkind, Wharton & Garrison LLP

Provide legal advice to clients on EU competition law and EU regulatory issues

## **DECISION**

The Appointing Authority approved Mr. Morch's activity with these conditions:

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts with DG COMP staff and with other Commission services, which were or are involved in policy files that fell under his responsibility during the last 3 years of service.
- Prohibition to work directly or indirectly on cases or policy files he was responsible for, and on other cases directly related to them, as well as on related appeals before the European Courts.
- No accepting as clients any major stakeholders in the market of Transport, Post, and other services, which actively participated in high-profile competition cases, which had been decided, or on which he had taken a position when he was responsible for those areas during his last 3 years of service.

Additionally:

- No advising Paul, Weiss or clients on files or matters, in which he had participated personally and substantially and that rely on non-public information.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Make restrictions and obligations transparent to Paul, Weiss and clients.

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11.

## **CONCERNS**

Mr Diederik SAMSOM

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

End of Service: 7 June 2024

## **NEW ACTIVITY**

Chair of the Supervisory Board of NV Nederlandse Gasunie, Groningen, the Netherlands.

The Supervisory Board's roles consists in monitoring the policy set by the Executive Board of Gasunie, and the general state of affairs.

## **DECISION**

The Appointing Authority approved Mr. Samsom's activity with these conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No professional contacts with staff of the Cabinets of Executive Vice-President for the European Green Deal, of Commissioner for Climate Action, of Commissioner for Energy (and the staff of their successors in their portfolio in the 2024-2029 Commission), as well as staff of DG ENER, DG CLIMA and IDEA. This condition also applies to other Commission services and their respective Cabinets involved in policy files that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission for Gasunie.

Additionally:

- No advising Gasunie on files or matters, in which he had participated personally and substantially and that rely on non-public information.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Make restrictions and obligations transparent to Gasunie.

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12.

## **CONCERNS**

Mr Diederik SAMSOM

## **NEW ACTIVITY**

Self-employed consultant; speaker at events; writer of columns, books, op-eds via his own company, to provide advice on sustainability, energy, climate and speak about the Green Deal.

## **DECISION**

The Appointing Authority approved Mr. Samsom's activity with these conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on matters for which he had been responsible during the last 3 years of service.
- No professional contacts with staff of the Cabinets of Executive Vice-President for the European Green Deal, of Commissioner for Climate Action, of Commissioner for Energy (and the staff of their successors in their portfolio in the 2024-2029 Commission), as well as staff of DG ENER, DG CLIMA and IDEA. This condition also applies to other Commission services and their respective Cabinets involved in policy files that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals to the Commission.
- No accepting as clients any of the major stakeholders which were significantly or prominently involved in, or affected by, files in which he was involved as Head of Cabinet, and which could cast a reasonable doubt on his independent and impartial performance of duties while in the service.
- Report every 6 months on compliance with the client acceptance restriction.

Additionally:

- No advising clients on files and matters files or matters, in which he had participated personally and substantially and that rely on non-public information.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Make restrictions and obligations transparent to clients.
- Clarify he acts in a private capacity when speaking or providing opinions, not representing the Commission.

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**13.**

## **CONCERNS**

Mr Diederik SAMSOM

## **NEW ACTIVITY**

Member of the Advisory Board of Van Oord in Rotterdam, the Netherlands.

Advise its Executive Board on issues of corporate sustainability, on renewable energy and on the global context of decarbonisation, among other matters.

## **DECISION**



The Appointing Authority approved Mr. Samsom's activity with these conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on behalf of Van Oord, its clients, or subsidiaries on matters for which he had been responsible during the last 3 years of service.
- No professional contacts with staff of the Cabinets of Executive Vice-President for the European Green Deal, of Commissioner for Climate Action, of Commissioner for Energy (and the staff of their successors in their portfolio in the 2024-2029 Commission), as well as staff of DG ENER, DG MARE, DG CLIMA, DG ENV and IDEA. This condition also applies to other Commission services and their respective Cabinets involved in policy files that fell under his responsibility during his last 3 years of service.
- No advising on or contributing to preparation of funding proposals by Van Oord, its clients, or subsidiaries to the Commission.

Additionally:

- No advising clients on files and matters files or matters, in which he had participated personally and substantially and that rely on non-public information.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Make restrictions and obligations transparent to Van Oord.

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## **14.**

### **CONCERNS**

Mr Diederik SAMSOM

### **NEW ACTIVITY**

Member of the Advisory Board of Elysian Aircraft BV in Mijdrecht, the Netherlands.

Advise the Executive Board on issues of corporate sustainability, on renewable energy and on the global context of decarbonisation, among other matters.

### **DECISION**

The Appointing Authority approved Mr. Samsom's activity with these conditions:

For 2 years after leaving the service:

- No lobbying and advocacy on behalf of Elysian Aircraft on matters for which he had been responsible during the last 3 years of service.
- No advising Elysian Aircraft's board or CEO on lobbying strategies related to matters for which he had been responsible during the last 3 years of service.
- No professional contacts with staff of Cabinets of Executive Vice-President for the European Green Deal, of Commissioner for Climate Action, of Commissioner for Energy, of Commissioner for Transport (and the staff of their successors in their portfolio in the 2024-2029 Commission), as well as staff of DG ENER, DG CLIMA, DG ENV, DG MOVE and IDEA. This condition also applies to other Commission

services and their respective Cabinets involved in policy files that fell under his responsibility during his last 3 years of service.

- No advising on or contributing to preparation of funding proposals by Elysian to the Commission.

Additionally:

- No advising Elysian Aircraft on files and matters files or matters, in which he had participated personally and substantially and that rely on non-public information.
- Ensure public communication includes explicit information that his activity is subject to restrictions imposed by the Commission.
- Make restrictions and obligations transparent to Elysian Aircraft.

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## **15.**

### **CONCERNS**

Ms Catherina SIKOW-MAGNY

Former Director at the Directorate-General for Energy (ENER)

End of Service: 31 August 2024

### **NEW ACTIVITY**

Member of an Energy and Climate High-Level Group on the ‘sustainable transition initiative of Politecnico di Torino: Foresight and Strategic Planning Office’ at Politecnico di Torino, in Turin, Italy.

Bringing expertise of economics and economic research to the attention of the High-Level Group.

### **DECISION**

The Appointing Authority approved Ms Sikow-Magny’s activity with these conditions:

For 12 months after leaving the service:

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

For 2 years after leaving the service:

- No professional contacts on behalf of Politecnico di Torino with DG ENER staff and its Cabinet.
- No advising on or contributing to preparation of funding proposals by Politecnico di Torino to the Commission.

Additionally:

- Clarify to interlocutors that she acts in a personal capacity, not representing the Commission.
- No advising Politecnico di Torino on files and matters files or matters, in which she had participated personally and substantially and that rely on non-public information.
- Make restrictions and obligations transparent to Politecnico di Torino.

