

# Annual Activity Report 2025

Directorate-General for Justice and Consumers

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# DG JUST IN BRIEF

The mission of Directorate-General Justice and Consumers (DG JUST) is to uphold and strengthen the rights of people living in the European Union (EU), regardless of whether they are acting as citizens, entrepreneurs, consumers or workers. DG JUST aims to strengthen compliance with the EU's core values – democracy, fundamental rights, the rule of law and equality. DG JUST focuses on deepening European cooperation in the area of justice and supporting the development of a dynamic Single Market for consumers, workers and businesses. DG JUST manages a large body of EU laws that cover its policy portfolio. To achieve the EU's objectives in these areas, DG JUST uses a wide range of tools, including better regulation tools and targeted legislative actions, non-legislative actions as well as implementation and enforcement tools to ensure that EU laws are applied effectively.

The achievement of policy objectives is supported by three programmes: 1) Citizens, Equality, Rights & Values (CERV) programme, 2) Justice programme, and 3) the consumer pillar of the Single Market Programme (SMP). These programmes have been successfully implemented during the year. Furthermore, DG JUST is the parent DG of the three decentralised agencies and bodies (EIGE, EUROJUST, FRA). DG JUST participates in the Steering Committee of the European Innovation Council and SMEs Executive Agency (EISMEA) which implements the SMP and closely oversees the European Education and Culture Executive Agency (EACEA) for the activities related to implementation of the CERV programme.

In 2025, DG JUST managed a budget of EUR 330.4 million in financial resources. Its policies are implemented through direct management mode via grants and procurement and indirect management mode through international organisations, and EU decentralised agencies: the European Institute for Gender Equality (EIGE), the European Union Agency for Fundamental Rights (FRA) and the European Union Agency for Criminal Justice Cooperation (EUROJUST). DG JUST is also in charge of budget and policy-related issues concerning the European Public Prosecutor's Office (EPPO).

In 2025, following the start of the new Von der Leyen Commission, a middle-scale reorganisation was conducted with one new unit joining DG JUST from DG EMPL (disability) and one new sector joining DG JUST from DG HOME (anti-corruption). At the same time, some policy topics along with their resource allocation moved to other departments, notably the EU coordinators for the fight against anti-Muslim hatred, antisemitism and the Article 17 dialogue team, were moved to the Secretariat-General.

# EXECUTIVE SUMMARY

This annual activity report is a management report of the Director-General of the department for Justice and Consumers (DG JUST) to the College of Commissioners. Annual activity reports are the main instrument of management accountability within the Commission and constitute the basis on which the College takes political responsibility for the decisions it takes as well as for the coordinating, executive and management functions it exercises, as laid down in the Treaties <sup>(1)</sup>.

This executive summary reports on the major achievements and results taking into account to the objectives of DG JUST in 2025, as set out in the DG JUST 2025 management plan, the Commission work programme for 2025 and the general and specific objectives enshrined in the 2025-2029 strategic outlook. Due to its broad mission, DG JUST contributed to the preparation of several cross-cutting files within the Commission.

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

DG JUST significantly contributed to the Commission's simplification agenda in 2025. In February 2025, as part of the **first Omnibus package on corporate sustainability reporting and due diligence requirements**, DG JUST proposed changes to simplify and streamline the due diligence duties of companies. These proposed changes aim to reduce the regulatory burden and preserve the underlying policy objective of promoting the transition towards a sustainable economic model. In December 2025 a political agreement was reached between the European Parliament and the Council (the co-legislator) on this first simplification package.

As part of the fourth simplification Omnibus package adopted in May 2025, DG JUST presented a targeted **amendment on the General Data Protection Regulation (GDPR)** record-keeping obligation. The proposed amendment aims to further extend the scope of the derogation from the record-keeping obligation, in addition to SMEs and organisations with less than 250 employees. In November 2025, the co-legislators adopted the **new procedural rules for cross-border GDPR enforcement**.

DG JUST also continued to **stress-test its acquis**, by evaluating several pieces of legislation, screening the implementing and delegated acts or organising implementation dialogues with stakeholders. DG JUST efforts to reduce administrative burden were reported on in the **Annual Progress Reports on Simplification, Implementation, and Enforcement** for Commissioner McGrath <sup>(2)</sup> and for Commissioner Lahbib <sup>(3)</sup>.

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<sup>(1)</sup> Article 17(1) of the Treaty on European Union.

<sup>(2)</sup> [https://commission.europa.eu/publications/2025-annual-progress-report-simplification-implementation-and-enforcement-commissioner-michael\\_en](https://commission.europa.eu/publications/2025-annual-progress-report-simplification-implementation-and-enforcement-commissioner-michael_en)

<sup>(3)</sup> [https://commission.europa.eu/publications/2025-annual-progress-report-simplification-implementation-and-enforcement-commissioner-hadja-lahbib\\_en](https://commission.europa.eu/publications/2025-annual-progress-report-simplification-implementation-and-enforcement-commissioner-hadja-lahbib_en)

In November, DG JUST presented the **European Democracy Shield**, setting out a series of concrete measures to empower, protect, and promote strong and resilient democracies across the EU. An open civic space is at the core of our democracies, and this is why the Commission has also put forward an **EU strategy for civil society**, for stronger engagement, protection and support to civil society organisations who play essential roles in our societies. On 2 December 2025, a provisional political agreement was reached between the co-legislators on a **directive on combating corruption** proposed by the Commission in May 2023.

The 2030 **Digital Justice package** was presented in November 2025. It aims to modernise justice systems across the EU and ensure that justice professionals are equipped with tools fit for the digital age. This strategic roadmap aims to accelerate the digitalisation of justice systems across the EU, empowering citizens, businesses, and justice professionals through innovation and cross-border collaboration.

By the end of 2025 the co-legislators reached **political agreements on important initiatives such as the revision of the Victims Rights' Directive** or the proposed **directive on harmonising certain aspects of substantive law on insolvency proceedings**, with DG JUST providing support throughout the negotiations.

Ahead of the 25<sup>th</sup> anniversary of the Charter of Fundamental Rights, setting out the fundamental rights enjoyed by everyone in the EU, the European Commission published in December 2025 the **2025 annual report on the application of the Charter in the EU**.

In July 2025 the Commission published its **sixth annual Rule of Law Report**, examining rule of law developments in all EU Member States and adding a Single Market dimension to the Rule of Law report in line with the Commission's Political Guidelines.

The **2030 Consumer Agenda** was presented in November 2025 and provides a new strategic framework for EU consumer policy. Alongside the Agenda, the Commission has presented an **Action Plan on Consumers in the Single Market**, identifying remaining barriers and proposing measures to ensure consumers do not face unfair discrimination and are fully protected when buying goods and services across borders.

The **Roadmap for Women's Rights** was adopted in March 2025, establishing a long-term vision for a gender equal society and setting out eight women's rights principles covering all spheres of life. Building on the Union of Equality, the **LGBTIQ+ equality strategy 2026-2030** was adopted in October 2025, as part of the EU's effort to build a Union where all people can be themselves without risk of discrimination, exclusion or violence.

DG JUST has continued working toward ensuring accountability for Russia's war of aggression against **Ukraine**, notably by participating in the discussions on the establishment of the Special tribunal, and more effective fight against violation of Union restrictive measures. The Freeze and Seize Task Force explored further initiatives to support EU Member States in the implementation and enforcement of EU sanctions, notably asset freezes, improve the fight against sanctions violations by means of criminal law, and ultimately enhance the Union's support to Ukraine's recovery and reconstruction. In December 2025 Commissioner McGrath co-signed on behalf of the Commission the **Convention establishing the International Claims Commission for Ukraine** on behalf of the EU. The signature is a major milestone in EU's collective efforts to ensure accountability and justice for Ukraine and Ukrainian people, ensuring that the victims of Russia's brutal war of aggression are properly compensated.

In 2025 DG JUST also finalised the renewal of the two 2021 **adequacy decisions for the free flow of personal data with the U K**. Adequacy decisions ensure that personal data can continue flowing freely and safely between the European Economic Area (EEA) and the UK, as the UK legal framework contains data protection safeguards that are essentially equivalent to those provided by the EU.

To support the delivery of the Commission's objectives, DG JUST actively **communicated on its activities**. Details on all communication actions are included in the tables below, which include key performance indicators (KPI) and results achieved.

## B. Key performance indicators

The table below illustrate the KPI related to the strategic outputs set for the period 2025–2029.

KPI #	KPI Title	Baseline (2024)	2025		Interim milestone (2027)	Target (2029)
<b>Specific objective 1.1: Improved conditions for companies, including SMEs, through EU company law and corporate governance rules, to set up, attract investment and grow sustainably in the Single Market</b>						
1.1.1	Number of searches in BRIS	565316	<b>721012</b>		<b>750000</b>	1000000
<b>Specific objective 1.2: Justice system adapted to digitalisation</b>						
1.2.1	Number of Member States that have all 9 digital solutions in both civil/commercial and administrative cases	3	<b>5</b>		<b>14</b>	27
<b>Specific objective 2.1: Accountability ensured for Russia's war of aggression against Ukraine and more effective fight against violation of Union restrictive measures</b>						
2.1.1	Number of criminal offences registered and adjudicated in relation to the violation of EU restrictive measures	304	<b>413</b>		<b>Increase</b>	Increase
<b>Specific objective 3.1: Fighting discrimination and promoting equality for all</b>						
3.1.1	Execution of funding for equality projects	17342246	<b>17342246</b>		<b>17342246</b>	17342246
<b>Specific objective 3.2.: Consumers are empowered and better protected</b>						
3.2.1	Consumer knowledge and trust index	50	<b>n.a.</b>		<b>Increase</b>	Increase
<b>Specific objective 5.1: Strengthening rule of law in the Union</b>						
5.1.1	Consolidation and further strengthening of the Rule of Law Cycle, with annual adoption of the Rule of Law Report	1 adoption per year	<b>The 2025 Rule of Law Report was adopted</b>		<b>1 adoption per year</b>	1 adoption per year
<b>Specific objective 5.2: Strengthening the application of fundamental rights</b>						
5.2.1	Percentage of people that know what the EU Charter of Fundamental Rights is	12%	<b>12%</b>		<b>20</b>	25
5.2.1	Percentage of people that have heard of the Charter	42%	<b>49%</b>		<b>50</b>	55
<b>Specific objective 5.3: Improved framework to protect democracy in the European Union</b>						
5.3.1	Citizens satisfied with how democracy works in the EU	57%	<b>n.a.</b>		<b>&gt;Baseline</b>	>Interim milestone
<b>Specific objective 5.4: A more developed European area of justice with enhanced judicial cooperation in civil and criminal matters</b>						
5.4.1	Number of cooperative exchanges between contact points of the European Judicial Network in criminal matters	12564	<b>15376</b>		<b>Increase</b>	Increase


(<sup>4</sup>)

(<sup>4</sup>) KPI 3.2.1. (Consumer knowledge and trust index) is taken from the Consumer Conditions Scoreboard, which is on a consumer survey with biennial frequency (last update 2024). KPI 5.3.1 (Citizens satisfied with how democracy works in the EU) is based on data collected in

**Caption:** The table features a colour-coded (left-right) bar system to visually represent the evolution of the indicator in comparison with the target. A green colour (bar on the right) indicates that the indicator is moving in the correct direction, whereas a red colour (bar on the left) suggests that the indicator needs to change course. For numerical indicators, the size of the bar also indicates proximity (distance) to the target.

**Sound financial management**

The table below shows the KPI related to the objective of sound financial management, namely, the estimated risk at payment/closure.

KPI #	KPI Title	Baseline (2024)	2025	Interim milestone (2027)	Target (2029)
5.2.1	Estimated risk at payment/closure	1%	1%	 maintain <2%	maintain <2%

## C. Key conclusions on internal control and financial management

DG JUST has systematically examined the available control indicators and results, as well as the observations and recommendations made by the Internal Auditor Service (IAS) and the European Court of Auditors (ECA).

The transition in 2025 to the Commission’s new accounting system, SUMMA, has required the adjustment to a new system and has impacted budget implementation tasks, processes and financial management activities, particularly during the first part of the year. This has required careful management to ensure the same data quality as in previous years.

All the above elements have been assessed to determine their impact on the management’s assurance about the achievement of the control objectives. For further details, please refer to Section 2 on internal control and financial management.

In conclusion, DG JUST’s management has reasonable assurance that, overall, suitable controls are in place and working as intended and that risks are being appropriately monitored and mitigated. Improvements are necessary concerning internal control principle 10 (the Commission selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.). where further developments of DG JUST internal control strategy need to be updated. The Director-General, in her capacity as Authorising Officer by Delegation, has signed the Declaration of Assurance albeit qualified by reservations concerning the financial risk corresponding to the residual error rate in the non-audited population of grants in the programmes managed under the budget chapters 07 06 and 07 07.

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the Standard Spring Eurobarometer. However, in the Standard Spring Eurobarometer 2025 the data for this indicator was not collected and, thus, it cannot be reported on for 2025.

## **D. Provision of information to the Commissioners**

In the context of the regular meetings during the year between the DG JUST and the Commissioners on management matters, the main elements of this report and assurance declaration, including the reservations envisaged concerning the financial risk corresponding to the residual error rate in the non-audited population of grants in the programmes managed under the budget chapters 07 06 and 07 07 have been brought to the attention of Commissioner Michael McGrath, responsible for Democracy, justice, the rule of Law and Consumer Protection (2024-2029); and Commissioner Hadja Lahbib responsible for Equality (2024-2029).

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

General Objective 1: A new plan for Europe's sustainable prosperity and competitiveness

Specific Objective 1.1: Improved conditions for companies, including SMEs, through EU company law and corporate governance rules, to set up, attract investment and grow sustainably in the Single Market

In February 2025 the Commission adopted the **Omnibus I proposal to significantly reduce the regulatory burden and the reporting obligations of companies** by amending the Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive (CSRD). A final political agreement on the Omnibus I proposal was reached on 9 December 2025. As regards the CSDDD, the political agreement: (i) significantly narrows its scope (by around 75%, from around 6 000 EU companies and 900 non-EU companies to around 1600 EU and 300 non-EU companies), (ii) simplifies the process of identification of adverse impacts, (iii) removes the obligation to adopt climate transition plans (meant to align the business model of in-scope companies with the 1.5°C objective of the Paris agreement and the intermediate targets of the EU Climate Law), (iv) postpones its entry into application (to July 2029), (v) sets a fixed cap for penalties for the most serious violations of 3% of worldwide turnover and (vi) removes of the harmonised EU civil liability regime. Formal adoption is expected to be completed in early 2026.

In May 2025 the Commission adopted the **Omnibus IV package** ('SMC Omnibus'), including a proposal for the **simplification of the GDPR record-keeping obligation**. The proposed change, targeted at companies and organisations with less than 750 employees, aims to provide these entities with more legal certainty and more flexibility in choosing the most appropriate tools for ensuring their compliance with the GDPR in their low-risk processing activities. The Council adopted its negotiation mandate at Coreper level in September 2025. The European Parliament is expected to adopt its position in the March 2026 plenary after which the trilogues could begin.

In November 2025, following the **Implementation Dialogue on the application of the GDPR** hosted by Commissioner McGrath in July 2025, the Commission adopted its proposal for the **Digital Omnibus**. The proposal includes a set of targeted amendments that aim to harmonise, clarify and simplify several GDPR provisions. For instance, the proposed changes to the GDPR (i) provide more legal certainty to operators, (ii) reduce administrative burden especially

for smaller operators, without lowering the level of data protection (when possible), and (iii) support EU innovation by clarifying the conditions for personal data processing for scientific research purposes and the development and use of AI. The Council has started negotiations on the proposal under the Danish Presidency.

DG JUST worked tirelessly in 2025 to prepare the proposal for the **28th Regime for Innovative Companies**. The proposal is a key deliverable of the Competitiveness Compass and included as a flagship initiative in the 2025 Strategies on the Single Market and on Start-ups and Scale-ups. A call for evidence and a public consultation was carried out in the summer of 2025, and detailed discussions on the upcoming initiative took place in the framework of the High-level Forum on Justice for Growth. The legislative proposal is scheduled for adoption in the first quarter of 2026.

Furthermore, the March 2025 **Communication on the Savings and Investment Union** announced the evaluation and revision of the Shareholder Rights Directive by the fourth quarter of 2026. Preparatory work began in 2025, including a dedicated session at the High-level Forum on Justice for Growth.

DG JUST also supported the timely and correct transposition of recently adopted acts that contribute to the EU's sustainable prosperity and competitiveness, including the 2025/25 **Upgrading Digital Company Law Directive** (to be transposed by 1.08.2028) issuing transposition templates and organizing transposition workshops.

In November 2025, together with the **Data Union strategy**, the Commission published non-binding model contractual terms on data access and use and non-binding standard contractual clauses for cloud computing contracts. The Commission is required to recommend such model clauses Article 41 of the Data Act. These voluntary tools are designed to help companies, notably SMEs, to implement the Data Act. They can be adapted by the contracting parties, while reducing costs and supporting compliance. In addition, the action aims to provide legal certainty and facilitate the uptake of innovative technologies by business, notably AI contracting.

In the Commission's 2025 work programme, the proposal for a directive on adapting **non-contractual civil liability rules to artificial intelligence (AILD)** was one of the 37 legislative proposals that the Commission planned to withdraw due to a lack of prospect for progress and the unlikelihood of reaching an agreement. The Commission's final decision to withdraw the AILD was published in October 2025. DG JUST developed initiatives that improve the conditions for companies engaging with innovative digital technologies and data-driven business models.

## Specific Objective 1.2: The justice system is adapted to digitalisation

In November 2025, the Commission adopted its **Digital Justice package**, containing the **DigitalJustice@2030 strategy** and the **2025–2030 judicial training strategy**, which creates a supportive environment for DigitalJustice@2030. The judicial training strategy builds on a staff working document taking stock of judicial training from 2021–2024. The package aims to ensure that the EU's justice systems and justice professionals are fully equipped for the digital age.

**DigitalJustice@2030** contains 15 actions with the shared objective of accelerating digitalisation of national justice systems, including the use of AI, to achieve efficiency gains and

to make justice systems more modern and resilient. This is expected to support courts in delivering faster and more effective justice, in turn contributing to growth and competitiveness, while helping to ease pressures on national justice systems.

The **2025-2030 judicial training strategy** places specific emphasis on the digitalisation of justice, by (i) supporting the development of digital skills, (ii) strengthening legal knowledge related to digital technologies, and (iii) increasing awareness of their benefits for the efficiency, quality, resilience and accessibility of justice. It promotes targeted training for judges, prosecutors and judicial staff on digital tools and systems, including electronic case management, electronic evidence, videoconferencing and AI-enabled applications. It also ensures full respect for fundamental rights, data protection and judicial independence, and supports the emergence of a common European judicial digital culture.

In 2025, DG JUST continued to support Eurojust in its effort to fully digitalise its processes. To this end, the Commission proposed, and the co-legislators adopted **Regulation (EU) 2025/2082** of 8 October 2025 amending the Eurojust Regulation as regards the extension of the timeframe for the establishment of the Eurojust case management system. In addition, on 4 December 2025, the Commission adopted Implementing Regulation (EU) 2025/2447 laying down the technical specifications measures and other requirements for the establishment and use of the decentralised IT system for secure processing and communication of information between Eurojust and the Member States.

DG JUST continued to work on the implementation of the **Digitalisation Regulation (EU) 2023/2844** in the Committee on Digitalisation of Judicial Cooperation. The first two implementing Regulations on the European Electronic Access Point and on the decentralised IT system were agreed by the committee. They represent the first batch of legal acts covered by the Regulation.

## General Objective 2: A new era for European defence and security

### Specific Objective 2.1: Accountability ensured for Russia's war of aggression against Ukraine and a more effective fight against violations of EU restrictive measures

Together with the European External Action Service (EEAS) and other Commission departments, DG JUST actively participated in the negotiations on the establishment of the **Special Tribunal for the Crime of Aggression against Ukraine**. In 2025 the Union pledged EUR 10 million to support the Tribunal's preparatory work.

DG JUST also continued to facilitate the EU's participation in the **Register of Damage** caused by Russia's war of aggression against Ukraine through an annual financial contribution under the Ukraine Facility. In parallel, DG JUST actively contributed to the negotiations on the establishment of the **Claims Commission** as a next step toward compensation and spearheaded the proposal that led to the EU sign the international Convention establishing the Claims Commission by the High Representative Vice-President Kallas and Commissioner McGrath in December 2025.

Through Eurojust, the Commission continued to support the Ukraine Joint Investigation Team and the International Centre for the Prosecution of the Crime of Aggression against Ukraine (ICPA).

In 2025, DG JUST continued its work on the **Freeze and Seize Task Force**, which met four times and continued to prove invaluable in ensuring coordination of sanctions implementation with and within the Member States as well as with the EU's international partners. With currently no end of the conflict in sight, the Task Force will continue to be operational in 2026 as well, to take forward the discussions on the enforcement of EU sanctions and the fight against their violations, notably by means of criminal law.

In 2025 the Task Force also served as the forum to discuss the implementation of Directive (EU) 2024/1226 on the **criminalisation of sanctions violations**. The timely and correct transposition of that Directive remained a key priority for the Commission and DG JUST in particular during 2025. On 20 May 2025, the deadline for Member States to transpose the new rules into their national legal systems expired. DG JUST continued to support the Member States in their implementation by organising transposition workshops, or discussing issues related to the transposition of the Directive in the Task Force as well as by holding bilateral exchanges, where needed. After the expiry of the transposition deadline in May 2025, the Commission opened infringement proceedings for non-communication of national measures implementing the Directive against 18 Member States in July 2025.

Negotiations on an **Additional Protocol to the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism** (CETS No. 198) have been concluded in 2025, with last adjustments of the Explanatory Report having been made during the last negotiation round in December 2025. During these negotiations, the EU was represented by the DG JUST with the Directorate-General for Migration and Home Affairs (DG HOME).

## General Objective 3: Supporting people, and strengthening our societies and our social models

### Specific Objective 3.1: Fighting discrimination and promoting equality for all <sup>(5)</sup>

The **Roadmap for Women's Rights** was adopted in March 2025, establishing a long-term vision for a gender equal society and setting out eight women's rights principles covering all spheres of life. It will guide the preparations of the specific measures to be included in the post-2025 gender equality strategy.

In October 2025 the Commission adopted the **2026-2030 LGBTIQ+ equality strategy**, building on the achievements of the 2020-2025 strategy. This new strategy is part of the EU's ongoing effort to create a union that celebrates diversity, ensuring people can express their

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<sup>(5)</sup> This specific objective also contributes to the general objective "Protecting our democracy, upholding our values" as illustrated in the Commission Work Programme, where the Gender equality strategy or the strategy for the rights of persons with disabilities were included under the general objective "Protecting our democracy, upholding our values".

identities without fear of discrimination, exclusion, or violence. It seeks to advance equality for LGBTIQ+ people by protecting them from harmful practices and hate crimes, empowering communities and organisations dedicated to equality, and engaging civil society, Member States, and other stakeholders. The strategy outlines measures to integrate LGBTIQ+ equality across all policy areas and amplify minority voices, with initiatives addressing conversion practices and funding civil society organisations.

On the proposal for the **Equal Treatment Directive**, the Commission decided to retain it for further political discussion, following the announcement of its intention to withdraw in its 2025 work programme, and after recognising support from the European Parliament and the Council. In 2025, the Commission continued to implement the EU Anti-racism action plan 2020-2025, including through joint activities with Member States and civil society organisations such as the EU Antiracism week in March or two meetings of the Subgroup on national action plans against racism. Furthermore, Commission worked closely with OECD on a report 'Monitoring and Assessing the Impact of National Action Plans Against Racism' (published in March 2025) and conducted preparatory work and public consultations to develop the first EU Anti-Racism Strategy, which was adopted on 20 January 2026.

The Commission continued to implement the **EU Roma Strategic Framework for Equality, Inclusion and Participation** in close cooperation with the national Roma contact points and civil society organisations. Member States' reports on the implementation of their national Roma strategies contributed to the discussions at the 18<sup>th</sup> meeting of the EU Roma Platform on 2 October 2025 and at the Implementation Dialogue of Commissioner for Equality Hadja Lahbib with stakeholders on 14 November 2025. The Commission further supported civil society and the Council of Europe in organising the Roma Holocaust commemoration ceremony and other awareness raising events on 2 August in Auschwitz.

The Commission also worked closely with Member States to support and monitor the implementation of the **Racial Equality Directive** and the **Employment Equality Directive** and collected their submissions to inform the regular application report on these two directives to be adopted in 2026. Intensive cooperation continued to prepare for a timely adoption in early 2026 the draft Implementing Regulations for indicators on the implementation of the horizontal directives on standards for equality bodies.

In 2025 the Commission continued to implement the **2021-2030 strategy for the rights of persons with disabilities**. Activities in 2025 included (i) participation in the second UN review on the implementation of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) by the EU in March 2025, (ii) implementation of the Directive establishing the European Disability Card and European Parking Card for persons with disabilities, by developing a delegated act on the physical versions of the cards, (iii) support for the transposition of the European Accessibility Act; (iv) preparatory interservice work and consultations to pave the way for the adoption, planned for 2026, of the Communication 'Enhancing the Strategy for the Rights of Persons with Disabilities up to 2030'; and (v) organisation of the European Day of Persons with Disabilities and the Access City Award.

The Commission continued its cooperation with **Diversity Charters** in 2025. Notable activities included celebrating the Diversity Month in May and the European Capitals of Inclusion and Diversity Award that focused on inclusive housing. In addition, in 2025, a comprehensive study

was published on the ‘Business case of diversity and inclusion at work’ particularly examining the impact of the Commission’s (diversity and inclusion policies).

On the DG JUST **equality mainstreaming work plan** adopted in 2024, significant advancements were made in implementing this plan in 2025. The plan aims at integrating equality into policy frameworks and boosting internal capacity. A network of equality contact points was launched. Two meetings were held in 2025, facilitating capacity building and the sharing of best practices. A conference on equality mainstreaming was also organised.

During 2025 work has been carried out on a study on **age equality and discrimination in the EU**, which offers a detailed quantitative and qualitative analysis of the current situation and identifies gaps. DG JUST has continued to facilitate Member States’ cooperation and coordination on equality and discrimination policies through the High-Level Group on Non-Discrimination, Equality and Diversity and its subgroups on antiracism, LGBTIQ equality and on equality data. In addition, on equality data, DG JUST continued to support Member States in advancing their collection and use of equality data through the activities of the Subgroup on Equality Data and in fostering cooperation with the Eurostat Task Force on equality and non-discrimination

### Specific Objective 3.2: Consumers are empowered and better protected <sup>(6)</sup>

In November 2025 the Commission adopted the **2030 Consumer Agenda**, including an action plan for consumers in the Single Market. The agenda establishes a five-year strategic framework that aims to enhance consumer protection and foster competitiveness, social fairness and sustainable growth. It proposes to achieve this by strengthening the consistent and effective implementation, application and enforcement of EU rules and by tackling important challenges. These challenges include (i) addressing Single Market barriers, (ii) strengthening digital fairness and online consumer protection (notably for children), (iii) fostering sustainable consumption and (iv) ensuring better protection against greenwashing. The protection of consumers in vulnerable situations and simplification and burden reduction also feature as overarching priorities.

In its efforts to boost consumer finance protection, DG JUST continued to work closely with the Member States to ensure the timely and effective transposition of the **Directive on credit agreements for consumers** (to be transposed by 20.11.2025) and the **Directive on the distance marketing of consumer financial services** (to be transposed by 19.12.2025) via transposition workshops and the publication of transposition templates. In addition, DG JUST worked closely with the Member States and businesses to facilitate the transposition and correct implementation of the **Empowering Consumers for the Green Transition Directive**, which will enter into application in September 2026 and the **Directive promoting the repair of goods**, which will enter into application in July 2026.

To ensure that out-of-court dispute resolution is fit for the digital markets, DG JUST continued to assist the negotiations of the **review of the Alternative Dispute Resolution (ADR) Directive**.

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<sup>(6)</sup> This specific objective also contributes to the general objective “Protecting our democracy, upholding our values” as illustrated in the Commission Work Programme 2026, where the Digital Fairness Act was included under the general objective “Protecting our democracy, upholding our values”.

The ADR Directive aims at modernising the ADR framework. Political agreement between the co-legislators was reached in June and the amendments were formally adopted in December 2025. The review aims at strengthening out-of-court dispute resolution by (i) introducing the trader's duty to reply to the ADR inquiries; (ii) extending the scope of ADR to non-EU country traders and provisions of digital content and digital services and contracts for which the consumer has not paid with money or involving non-EU country traders where conditions are met), (iii) mandating measures to incentivise trader participation; (iv) and introducing customised assistance for cross-border disputes, relying on the European Consumer Centres Network or other consumer protection body which the Member States will designate .. In 2025 DG JUST started preparing the report on the application of **the Sale of Goods Directive** (2019/771/EU) and **Digital Content Directive** (2029/770/EU), which is planned for publication in 2026. A support study was also launched in 2025 to inform the report.

In 2025 DG JUST continued to assist the co-legislators in the negotiations on the proposal of November 2023 to **amend the 2015 Package Travel Directive**. The proposal aims to strengthen the protection of travellers and to simplify and clarify certain aspects of the rules. Political agreement between the co-legislators was reached in December 2025. Based on experience during the COVID-19 pandemic, the amended Directive contains (i) rules and guarantees for vouchers offered in lieu of a refund for a cancelled travel package; (ii) clarifications on the cancellations due to unavoidable and extraordinary circumstances and on insolvency protection; (iii) clearer information for travellers; as well as a (iv) right to refund for package organisers against service providers where a travel service is cancelled. The amended Directive significantly simplifies through the rules by deleting the concept of linked travel arrangements.

Following the comprehensive Fitness Check of EU consumer law completed in 2024, DG JUST worked on preparing the proposal for a **Digital Fairness Act (7)** whose adoption is planned in 2026. As part of the evidence-gathering and consultations for the impact assessment, a public consultation and a call for evidence took place in 2025. The Commission commissioned an external study to support the impact assessment. Additionally, DG JUST organised an **implementation dialogue with Commissioner McGrath on consumer law in the digital environment**.

Work on the **General Product Safety Regulation (GPSR)** has continued to raise awareness of the new rules and to ensure that they are being correctly and smoothly implemented and enforced. The work that was carried out included (i) carrying out a first product safety sweep under the new rules to check the compliance of listings of childcare articles and to launch joint testing and capacity building activities; (ii) adopting GPSR guidelines for businesses and regularly updating the GPSR guidance for businesses on the Safety Gate Portal; (iii) managing the Safety Gate and the online Safety Gate Portal, including by promoting the Consumer Safety Gateway to report safety issues and accidents by consumers;(iv) raising awareness among businesses on the compulsory use of the revised Safety Business Gateway; (iv) improvements to the e-

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(7) This initiative also contributes to the general objective "Protecting our democracy, upholding our values" as illustrated in the Commission Work Programme 2026.

Surveillance WebCrawler <sup>(8)</sup> to increase its uptake by Member States; (vi) increasing the uptake of the Safety Gate Interoperability Gateway (SGIG), (iv) supporting the implementation of the GPSR by continuing to request the development of European standards from standard setting organisations and (viii) citing the reference of these standards in the Official Journal of the EU.

DG JUST continued supporting the GPSR implementation by preparing implementation studies and guidance. This included (i) preparing of the publication of the study on the safety of circular products; (ii) developing follow-up guidance on how to ensure the safety of circular products; (iii) launching of the study on e-vulnerabilities in product safety (iv) developing further guidance for businesses on how to ensure that products are safe.

The Commission continued implementing the extended **Consumer Protection Pledge** which gained two new signatories and has continued to work on the implementation of the e-commerce Communication linked to product safety (e.g. monitor the influx of incoming parcels from non-EU countries marketplaces and discuss actions to tackle the challenges of ecommerce platforms with the Consumer Safety Network). On top of a coordinated action to develop capacities on the mental health risks around consumer products, DG JUST has championed this topic within the OECD Working Party on Consumer Product Safety and has funded an OECD study on emerging risks related to new technologies, including mental health risks.

The **Safety Gate Rapid Alert System** has reached record numbers of alerts and follow-up notifications validated and circulated in the system, totalling 4671 alerts and 5794 follow-up notifications. Most of the alerts reported concerned cosmetics with dangerous chemicals, mostly cosmetics with BMHCA (Butylphenyl Methylpropane, a synthetic fragrance).

The ceremony of the 2025 edition of the **EU Product Safety Award** took place 10 December 2025. The Award encourages and honours innovative business initiatives and research that enhance consumer safety beyond legal requirements. It celebrated the work of businesses and researchers from four different countries for their innovative businesses' initiatives and research that enhance consumer safety beyond legal requirements. Separate awards were given to small and medium-sized enterprises (SMEs), large companies and researchers.

In addition, DG JUST provided support and coordinated the enforcement actions of the **Consumer Protection Cooperation (CPC) Network**. DG JUST continued to provide the common toolbox for the digital investigations (the EU lab) to the CPC authorities. This includes mystery shopping, monitoring misleading discounts, detecting fraudulent web shops and marketing and assistance in targeted enforcement actions and market sweeps. Several enforcement networks are testing the EU lab for potential reuse. JUST also coordinated the work of the CPC Network in the context of the coordinated action initiated against 21 airlines for misleading green claims, which was successfully closed in November 2025, after airlines committed to changes required by the CPC Network. DG JUST facilitated the coordinated action of the CPC Network and obtained that Coca-Cola commits to improve the recycling claims disclosed on plastic bottles, to ensure fair environmental information to consumers. Implementation of the changes to these claims continues to be monitored.

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<sup>(8)</sup> The eSurveillance webcrawler introduces a scalable, AI-enabled capability that continuously monitors online marketplaces to detect and remove products already flagged as dangerous in [Safety Gate](#).

In addition, DG JUST promoted fund capacity-building initiatives for national authorities, including training on e-enforcement <sup>(9)</sup>, investigative tools, exchanges of best practices and behavioural studies to assess the impact of business practices on consumers.

Building on the **Commission's communication on e-commerce** published in February 2025, which announced the preparation and assessment of measures to further improve and strengthen enforcement at EU level, DG JUST undertook preparatory work in 2025 to revise the Consumer Protection Cooperation Regulation. That work focused on assessing the need to boost coordination among national authorities, as well as the potential need for more centralised investigation and enforcement powers at EU level. The revision was announced in the 2030 Consumer Agenda for Q4 2026. This work was complemented by exchanges with stakeholders, including regular meetings with Member States and a dedicated panel on enforcement organised during the 2025 Consumer Summit.

The year 2025 also marked the **20th anniversary of the European Consumer Centres Network (ECC-Net)**. DG JUST hosted an event under the auspices of Commissioner McGrath to recognise the added value of the ECC-Net as it assists over 130,000 EU consumers per year free-of-charge and to discuss the future of the ECC-Net in view of the increased workload and ongoing rapid changes in consumer markets (e.g. use of AI tools in case-handling, more complex disputes, the role of ADR contact points, enlargement), while ensuring that EU consumers exploit the potential of the Single Market.

At the **international level**, DG JUST has taken a proactive role in advancing consumer protection and product safety, leveraging both multilateral fora and bilateral cooperation. DG JUST is a Bureau member and actively participates in the OECD Committee on Consumer Policy and in the Working Party on Consumer Product Safety. DG JUST has also championed product safety at the UN level, having played an instrumental role in the adoption on 15 December 2025 by the UN General Assembly of a landmark resolution establishing the first-ever United Nations Principles for Consumer Product Safety. DG JUST is now cooperating with UNCTAD to develop a handbook and trainings aimed at implementing those principles and helping regulators as well as policy makers set up or strengthen their product safety frameworks.

At bilateral level, DG JUST is collaborating with relevant authorities in Canada and China on product safety through regular exchanges of selected data on dangerous products via Safety Gate. DG JUST also actively participates in capacity building projects on consumer protection and product safety. The Safe non-food consumer products in the EU and China (SPEAC) project which addresses Chinese manufacturers and other operators in the supply chain has finalized its second edition. Over 148 SPEAC trainings activities were followed by over 1 million participants during the project's second edition. The technical assistance project competition and consumer product safety policies in the Common Market for Eastern and Southern Africa (COMESA), which was launched in July 2025, is supporting reinforced product safety frameworks and the establishment of a rapid alert systems on dangerous products. DG JUST is also cooperating with the UK Office for Product Safety and Standards under the Department of Business and Trade in order to

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(9) This concerns trainings on consumer law enforcement in the digital environment (e-commerce, social media, influencer marketing, etc.), and the use of the advanced technologies, including AI, to detect and address malpractices online.

conclude an arrangement on the exchange of information between the Safety Gate system and the UK Product Safety Database, in line with Article 96(4) of the EU-UK Trade and Cooperation Agreement.

## General Objective 5: Protecting our democracy, upholding our values

### Specific Objective 5.1: Strengthened rule of law in the EU

DG JUST continued to advance the Commission's work to uphold the rule of law. In July 2025 the Commission adopted the **sixth annual rule of law report**<sup>(10)</sup>, the first report under the Commission's current five-year mandate. The report consolidates the successful engagement with Member States based on a preventive and dialogue-based approach to strengthen the rule of law, and it is an important incentive for reform. It emphasises the Single Market dimension of the rule of law, in line with Commission's Political Guidelines of the President for 2024-2029.

DG JUST continued to contribute to applying the Commission's **Rule of Law Toolbox**, including the general regime of conditionality, the EU Charter of Fundamental Rights' horizontal enabling condition in the Common Provisions Regulation, the Recovery and Resilience Facility, the European Semester, Article 7 of the Treaty of the European Union and, where needed, infringement proceedings.

In July 2025, the Commission also published the 13<sup>th</sup> edition of the EU Justice Scoreboard. As in previous years, the 2025 EU Justice Scoreboard provides comprehensive data on three key areas of effective justice systems in Member States: efficiency, quality, and independence. The 2025 EU Justice Scoreboard complements the 2025 rule of law report's innovative Single Market dimension with new and updated charts. It highlights the critical role the rule of law plays in shaping a predictable business environment drawing on indicators related to public procurement review bodies, supreme audit institutions, and national competition authorities. The EU Justice Scoreboard continues to provide comparative data for the country specific assessment carried out as part of the European Semester process and the assessments done under national recovery and resilience plans. The study, procured in 2024, on the application of the rules on state liability for breaches of EU law and on the application of the preliminary ruling mechanism under Article 267 of the Treaty on the Functioning of the European Union was completed in 2025.

Following the transfer of the anti-corruption team from DG HOME to DG JUST in February 2025, DG JUST pursued negotiations with the co-legislators in 2025 on a **Directive on combating corruption** <sup>(11)</sup> proposed by the Commission in May 2023. A provisional political agreement was reached on 2 December 2025 between co-legislators. The new rules provide a modern and harmonised framework to effectively prevent, detect, and sanction corruption. DG JUST also organised the third plenary meeting of the EU Network Against Corruption and held other activities under this banner, including a number of workshops in the Member States. Acting as focal point, DG JUST also ensured that the executive summary of the review of the EU under the UN Convention against Corruption was successfully finalised and published, in coordination with the UN Office for Drugs and Crime and the peer reviewers.

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<sup>(10)</sup> COM(2025) 900 final.

<sup>(11)</sup> COM(2023) 234 final of 3.5.2023

## Specific Objective 5.2: Strengthened application of fundamental rights

In December 2025, the Commission adopted the **2025 annual report on the application of the EU Charter of Fundamental Rights**. The 2025 Charter report sets out the results of a mid-term review of the implementation of the Strategy to strengthen the application of the EU Charter of Fundamental Rights. Drawing on broad consultations, the review found that while most of the measures of the strategy are being implemented, important gaps remain. The 2025 Charter report therefore sets out further policy measures to support the strategy's implementation in 2026-2030. To help strengthen the application of the Charter in both the EU and national administrations, DG JUST updated the Commission guidance on fundamental rights in impact assessments and published a handbook on fundamental rights in EU funding.

The adoption of the Charter report coincided with the **25th anniversary of the Charter's proclamation**, marked on 7 December 2025. The Commission, the European Union Agency for Fundamental Rights (FRA) and the Danish Presidency organised a conference in December 2025 to mark this occasion, bringing together participants from various stakeholder groups to reflect on the impact of the Charter. The anniversary was also publicised on social media.

DG JUST continued to work on **promoting and protecting children's rights**. It organised the 15th European Forum on the Rights of the Child to discuss progress and next steps of the EU Strategy on the rights of the child. Children participated actively and presented their Call to Action prepared during the General Assembly of the **EU Children's Participation Platform**. DG JUST organised a study visit to Ireland, where children from the EU Children's Participation Platform and Member States' representatives from the EU Network for children's rights discussed meaningful ways forward to strengthen child participation in policymaking. Successful consultations were launched under the EU Children's Participation Platform on cyberbullying (6 300 responses) and on poverty and social inclusion (41,500 responses), informing Commission's priority initiatives in 2026. The Commission also adopted a mainstreaming checklist to include the rights of the child in Commission impact assessments, which is annexed to the guidance on fundamental rights in impact assessment.

The **code of conduct+ on countering illegal hate speech online** was presented in January 2025 in the framework of the Digital Services Act. Based on the role assigned to the Commission under the Code, DG JUST has contributed to its implementation throughout 2025. This included the organisation of an annual convening with all signatory platforms in June 2025 and the coordination of the first monitoring exercise in November/December 2025.

DG JUST coordinated the input by relevant Commission departments and EU agencies on the 21 recommendations adopted by the **2024 European Citizens Panel on Tackling Hatred in Society**. DG JUST also coordinated a feedback event with the participants to inform them about the follow-up to the recommendations. The feedback event took place in June 2025.

In 2025 DG JUST continued to monitor the correct and complete transposition of the 2008 Framework Decision on combating racism and xenophobia by means of criminal law. It also continued to advance policy support to Member States in the context of the High-Level Group on combating hate speech and hate crime. To further boost the support to national authorities in this area, DG JUST has also created a new network of law enforcement contact points specialised on hate offences and a network of prosecutors specialised or working on hate offences, which

were officially endorsed by Member States at the annual High Level Group meeting. DG JUST has also set up, in cooperation with the Council of Europe, a new work stream on prevention and awareness-raising against hatred.

DG JUST continued to monitor the full transposition of Whistleblower Protection Directive (EU) 2019/1937). In March 2025, the Court of Justice of the EU, delivered five judgements against Member States for failing to transpose the Whistleblower Protection Directive, imposing at the same time, financial penalties. DG JUST has ensured that the rulings have been effectively implemented and the payment of the financial penalties have been made, in four out of the five cases that will be closed in one of the upcoming cycles. Furthermore, DG JUST has launched the evaluation of the Whistleblower Protection Directive (EU) 2019/1937, with a view to adopting a report by end of 2026.

To ensure the protection of **fundamental right to the protection of individuals' personal data** DG JUST continued its work by assessing the compliance of national legislation with the GDPR and the Data Protection Law Enforcement Directive (LED). Compliance with data protection body of legislation was also assessed in the context of Schengen evaluations for which DG JUST organised an online training for national data protection experts. DG JUST also continued mainstreaming data protection rules in key EU sectoral legislative initiatives and policies. In addition to the proposed GDPR amendments in the two Omnibus simplification proposals (see General Objective 1), DG JUST started to work on the follow up to (i) the Commission's 2022 report on the application of the data protection rules for EU institutions, bodies and agencies (EUDPR), and (ii) the necessary amendments to the EUDPR to be adopted as a part of the upcoming criminal law package. DG JUST started preparing the Commission's second report on the application and functioning of the LED, due in the first half of 2026, and continued facilitating the twice-yearly exchanges of the network of data protection officers of national and EU law enforcement and criminal justice authorities. DG JUST also continued actively supporting the work of the European Data Protection Board.

### Specific objective 5.3: An improved framework to protect democracy in the EU

Under this specific objective 2025 was marked by the preparation and adoption of the **democracy package**, which included the European Democracy Shield and the first-ever EU strategy for civil society.

DG JUST organised wide consultations in preparation of the **European Democracy Shield**, seeking the views of the Member States, the European Parliament, the other EU institutions and bodies, as well as a wide range of stakeholders, through different focus groups and roundtables with Commissioner McGrath. A public consultation and a Eurobarometer were also conducted. DG JUST also organised the first **Youth Policy Dialogue** with Commissioner McGrath on the topic of democratic resilience, to inform the preparations for the European Democracy Shield. The communication on the European Democracy Shield, as adopted in November 2025, provides a strategic approach to safeguard, strengthen and promote democracy in the EU in the long run. A series of new actions are announced under three priority areas, which will be progressively rolled out by 2027.

These include (i) reinforcing situational awareness and support response capacity to safeguard the integrity of the information space, (ii) strengthening democratic institutions, free and fair elections and free and independent media and (iii) boosting societal resilience and citizens' engagement. Following the adoption, DG JUST worked on implementing the new actions under the European Democracy Shield, including by a close involvement in the set-up of the European Centre for Democratic Resilience. Dedicated working groups on AI in electoral processes, election integrity and safety in politics have also been launched under the European Cooperation Network on Elections (ECNE). DG JUST continued to facilitate targeted exchanges and foster mutual support among Member States through ECNE, to further improve preparedness around elections and reinforce resilience of electoral processes.

The Commission published a checklist on the integrity of elections and a risk management matrix for elections in June 2025, prepared with Member States in the framework of ECNE. In addition, in June 2025 the Commission adopted a Report on the conduct of the 2024 elections to the European Parliament.

The Council adopted the recast of the Directive on electoral rights of mobile EU citizens in elections to the European Parliament in June 2025, which had been proposed by the Commission in November 2021. DG JUST also worked closely with the Council in support of reaching agreement on the electoral rights of mobile EU citizens in municipal elections directive.

In 2025, the Commission supported the interinstitutional discussions on the proposed Directive on interest representation carried out on behalf of third countries, presented in December 2023 by the Commission. In November 2025, the European Parliament adopted its negotiating position on the proposal.

In 2025 the Commission worked on the **implementation of the Political Advertising Regulation 2024/900**, in view of its entering into full application on 10 October 2025. In July 2025 the Commission adopted an Implementing Act on Labels and Transparency Notices, clarifying the format, template and technical specifications. The Implementing Act was drawn up together with a comitology committee and built on feedback received from relevant stakeholders, a call for evidence and a public consultation. In October 2025 the Commission published two web portals, one [through which Member States provide the dates of their elections](#), and one [linking national websites on the registered legal representatives of providers of political advertising services established outside the EU](#), in line with the Regulation requirements (Articles 21 and 26). In October 2025, the Commission adopted Guidelines to support the implementation of Regulation 2024/900. The guidelines build on feedback received from relevant networks and dedicated focus groups as well as from a call for evidence and targeted public consultation. It primarily focuses on the identification of political advertising, in line with Article 8(2) of Regulation 2024/900, and transparency and due diligence obligations under the same Regulation.

In November 2025 the Commission adopted the first-ever **EU Strategy for Civil Society** to strengthen engagement with, support and protection for civil society organisations in the EU and globally. DG JUST organised consultations with a wide range of stakeholders, including a public consultation and targeted consultations with international organisations, national human rights institutes and equality bodies, donors and philanthropic organisations, as well as several groups of civil society organisations, working across a broad range of sectors. With this strategy, the Commission is stepping up its engagement with civil society and will further support and protect

civil society organisations in their work. The strategy proposes meaningful actions at EU and national level.

The strategy covers three key objectives of strengthening engagement with civil society organisations, strengthening support and protection, and providing sustainable and transparent funding. The strategy acknowledges the essential role that civil society organisations have in our societies and for a vibrant democracy, through the broad range of activities and services they implement daily, including by giving voice to and underrepresented communities. It sets out a common framework of action to support and empower independent civil society organisations at EU and national level and proposes meaningful actions to achieve its objectives.

To strengthen EU citizenship and the rights that flow from it the Council adopted in June 2025 **Regulation (EU) 2025/1208 on strengthening the security of identity cards** of EU citizens and of residence documents issued to EU citizens and their family members exercising their right of free movement. This legislation was needed since the Court of Justice of the EU had annulled its predecessor, Regulation (EU) 2019/1157, in case C-61/22. That legislation ensures that EU citizens and their family members can exercise their right to free movement on the basis of safe and reliable documents. Moreover, as of 9 December 2025, Member States are issuing EU Emergency Travel Documents to, notably, EU citizens exercising their EU citizenship right to consular protection.

#### Specific Objective 5.4: A more developed European area of justice with enhanced judicial cooperation in civil and criminal matters

In the field of judicial cooperation in criminal matters, the **High-Level Forum on the Future of EU Criminal Justice** was established in February 2025 to take stock and develop a forward-looking vision for EU criminal law. Four plenary meetings were held between March and December 2025, and a final report summarising the main points for discussion was endorsed by the Forum at its last meeting on 1 December 2025.

By the end of 2025 the co-legislators reached **political agreement on the revision of the Victims Rights' Directive**, with DG JUST providing support throughout the negotiations.

In 2025, DG JUST carried out an **evaluation of the implementation of the Eurojust Regulation** published in July 2025. The evaluation sought to measure the effectiveness, efficiency, relevance, coherence and EU added value of the Agency in order to assess how its work can be improved in the upcoming revision in 2026. The evaluation confirmed that while Eurojust provides highly effective operational support to national authorities, its efficiency could be improved.

In 2025 DG JUST, as the service in charge of policy-related issues for EPPO and Eurojust, Directive 2017/1731 on the fight against fraud to the Union's financial interests by means of criminal law ("**PIF Directive**") as well as the rule of law, anti-corruption, data protection, and whistleblower protection, contributed actively to the ongoing discussions on the review of the EU anti-fraud architecture (AFA). Against this background in 2025 DG JUST took the necessary measures to prepare the adoption of the evaluation report on the EPPO Regulation and the PIF Directive in

2026 as well as the proposals to revise both instruments by the end of 2026. DG JUST also continued to monitor the implementation of the PIF Directive.

In addition, DG JUST organised the selection procedure to replace the current European Chief Prosecutor, whose mandate expires in October 2026, DG JUST also continued to provide the secretariat to the independent selection panel hearing candidates for the post of European Chief Prosecutor and European Prosecutor from some Member States.

In 2025 DG JUST continued the work on environmental crime. Given the deadline to transpose Directive (EU) 2024/1203 on environmental crimes in May 2026, DG JUST organised two transposition workshops in June and December 2025 to support Member States in the implementation process. In addition, DG JUST held bilateral exchanges to support Member States. At the international level, on 3 December 2025 the Council of Europe Convention on environmental crimes was signed. In 2025 DG JUST, together with DG ENV, ensured that work on the Council Decision on the signature of the Convention was completed on time, to ensure the Commission was able to sign the Convention on behalf of the EU during the signing event.

The Commission continued to monitor the practical implementation of the **European Criminal Records Information System (ECRIS)** in the Member States and managed to ensure significant improvements on the number of interconnections, notifications on new convictions and updates, requests for information, as well as timely responses to requests. The third statistical report on the exchange of criminal records information through ECRIS will be adopted in early 2026.

In 2025, preparations intensified for the entry into operations of the centralised system for the identification of Member States holding conviction information on third-country nationals (ECRIS-TCN) that will supplement the existing ECRIS system as from June 2026. In this context, in November 2025 the Commission adopted Implementing Decision (EU)2025/2281 amending its previous Implementing Decision (EU) 2022/2470 as regards technical specifications for the quality, resolution and processing of facial images.

DG JUST continued to support the Member States and EU-LISA in the context of the Joint Investigation Teams (JITs) collaboration platform, including through the project's Advisory Group and Programme Management Board. In June 2025 the Commission adopted Implementing Decision (EU) 2025/1274 laying out the technical specifications pertaining to the JITs collaboration platform, in accordance with Regulation (EU) 2023/969.

In July 2025 the Commission adopted an Implementing Regulation setting out the technical specifications for the e-Evidence decentralised IT system, in accordance with Regulation (EU) 2023/1543 on European Production Orders and European Preservation Orders for electronic evidence in criminal proceedings.

In the field of judicial cooperation in civil and commercial matters, DG JUST supported the co-legislators to reach an agreement in November 2025 on the proposed directive on harmonising certain aspects of substantive law on insolvency proceedings. DG JUST also continued to facilitate interinstitutional negotiations on the proposal on the protection of adults in cross-border situations and the proposal on recognition of parenthood. On the proposal on the protection of adults, the Council reached a partial general approach in June 2025.

In 2025 the Commission decided to withdraw the proposed regulation on the law applicable to the third-party effects of assignment of claims. The Commission also adopted application reports concerning the Rome II Regulation and Brussels Ia Regulation. The review work on Brussels Ia Regulation started towards the end 2025.

DG JUST updated the Compendium of EU legislation on judicial cooperation in civil and commercial matters, which now provides a complete, up-to-date and user-friendly collection of EU law in force in civil justice. DG JUST also continued to closely monitor the transposition of the **Anti-SLAPP Directive**, for which the transposition deadline is 7May 2026. Additionally, DG JUST started preparing the yearly summary report on the Member States' follow-up of the Anti-SLAPP Recommendation based on data collected and provided by the Member States.

Civil justice was among the topics discussed in the context of the **High-Level Forum on Justice for Growth**, in particular the possible review of Brussels Ia and Rome II Regulations and the need to legislate on third party litigation funding (TPLF). The Forum concluded in November 2025 that it would be premature to legislate on TPLF.

On the **digitalisation of civil justice** two Commission Decisions were adopted in 2025 to establish the steering committees to assist with the operation and maintenance of the decentralised IT system for the purposes of the Regulations on Service of Documents (SoD) and Taking of Evidence (ToE). As of 1May 2025, Member States are required to communicate electronically for the purposes of these two Regulations.

In the international fora in July 2025 DG JUST proposed a Council decision to authorise the conclusion of the UN Convention on judicial sale of ships in order to allow the Member States to ratify it. The decision was approved by the Council in December 2025. The Commission (DG JUST) also continued to represent the EU and actively contributed and coordinated the EU and Member States' input into ongoing negotiations on Data Provision Contracts at UNCITRAL Working Group IV on Electronic Commerce.

## 2. INTERNAL CONTROL AND FINANCIAL MANAGEMENT

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

### 2.1. Control results

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

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

This section reports on the control results used by management to support the assurance on the achievement of the internal control objectives (ICO) <sup>(12)</sup>. The DG's assurance building and materiality criteria are outlined in annual activity report annex 5. The annual activity report annex 6 outlines the main risks together with the control processes to mitigate them and the indicators used to measure the performance of the relevant control systems.

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<sup>(12)</sup> 1) Effectiveness, efficiency and economy of operations; 2) reliability of reporting; 3) safeguarding of assets and information; 4) prevention, detection, correction and follow-up of fraud and irregularities; and 5) adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the multiannual character of programmes as well as the nature of the payments (FR Art 36.2). The 2nd and/or 3rd Internal Control Objective(s) (ICO) only when applicable, given the DG's activities.

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

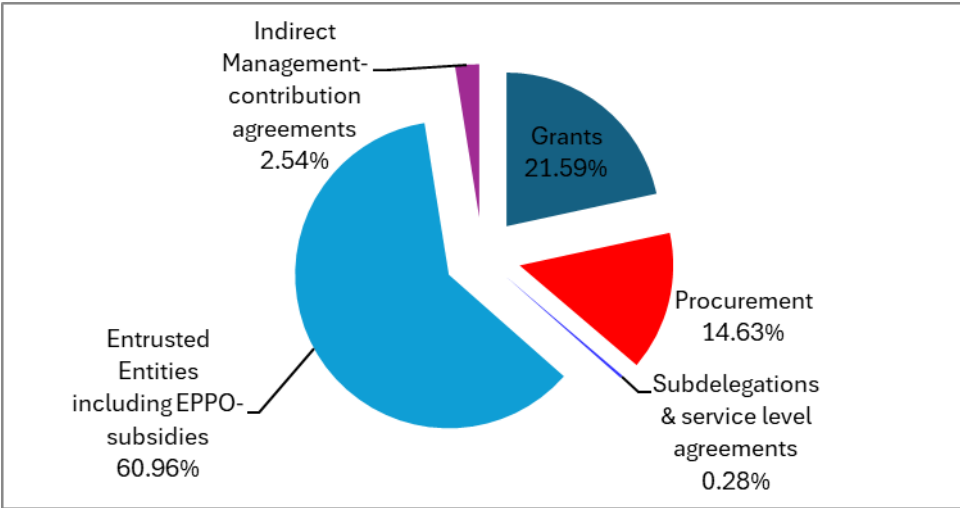
The main distinct internal control systems concern direct management – grants segments, direct management - procurement and the financing of the decentralised agencies and Union body EPPO. Reliable and complete controls are put in place for each category concern and different indicators are used for each stage. The most relevant indicators refer to numbers of project selected, time-to indicators, cost effectiveness.

DG JUST programmes are implemented through two management modes:

- **The direct management mode** - grants (Relevant Control System -RCS 1) and procurement (Relevant Control System -RCS 2) – by the Commission on the Citizens, Equality, Rights and Values (CERV), Justice programmes and the Single Market Programme (SMP). In terms of payments direct management represents 36.2% of the total DG JUST payments made of EUR 312.98 million. To be noted that beside this amount (EUR312.98 million) EUR 160.1 million were payments co-delegated to executive agencies (EACEA, EISMEA) and other DGs in charge of the implementations for which DG JUST is not responsible.
- The **indirect management mode** (Relevant Control System -RCS 3) - where DG JUST entrusts pillar assessed entities (i.e. international organizations). This represents 2.83% of total DG JUST payments implemented.

The EU has established **decentralised agencies** in the area of Justice and Consumers to support EU Member States and their citizens in coping with new tasks of specific nature. Together, the European Institute for Gender Equality (EIGE), the European Union Agency for Fundamental Rights (FRA) and the European Union Agency for Criminal Justice Cooperation (EUROJUST) provide information and advice, prepare and take decisions, oversee operations and support policy making. The European Public Prosecutor’s Office (EPPO) is responsible for investigating and prosecuting criminal offences affecting the financial interests of the Union.

DG JUST’s **decentralised agencies and the Union body EPPO** are financed from contributions from the EU budget voted each year by the EU budgetary authority. DG JUST payments towards the decentralised agencies and the EPPO represent 60.96% of the total DG JUST implemented budget of EUR 312.98 million.



DG JUST, in terms of commitments, managed a budget of EUR 330.9 million <sup>(13)</sup> in 2025.

During the year 2025, DG JUST decentralised agencies (EUROJUST, FRA, EIGE) and the EPPO have used 90% of their commitment appropriations and 79% of the payment appropriations. The unused amount for payments will be carried forward and used during 2026. This result is similar to 2024 (92% in commitment appropriations and 80% in payment appropriations).

DG JUST manages intangible assets (EUR19839 million) which are IT applications and are cumulated from 2012.

Recurrent reservations were issued referring to the residual error rate for the grant segment, which was estimated at 3.13%.

Overall, reliable and complete control results are available for each control system. The analysis and conclusions of each relevant control category in terms of legality and regularity and cost efficiency is described and explained in further detail below under Part 2.1.2 and 2.1.3. Key indicators have been defined for each stage of the relevant control system and presented in detail in Annex 5,6 and 7. One reservation has been issued based on the legality and regularity indicators and detailed in Part 2.4.

Regarding the overall efficiency of controls, a positive conclusion has been reached based on an overall cost-efficiency indicator of 4.56% which has slightly increased comparing with the previous year (4.27%) (details in Part 2.1.4).

All credits that expired at the end of 2025 were fully implemented for the operational activities and this is an **outstanding accomplishment**. This outcome is the result of good planning and a constant monitoring of the payments implementation, as well as sustained efforts of DG JUST Budget, Programmes and Financial Management Unit in particular in December in order to ensure full absorption by year-end.

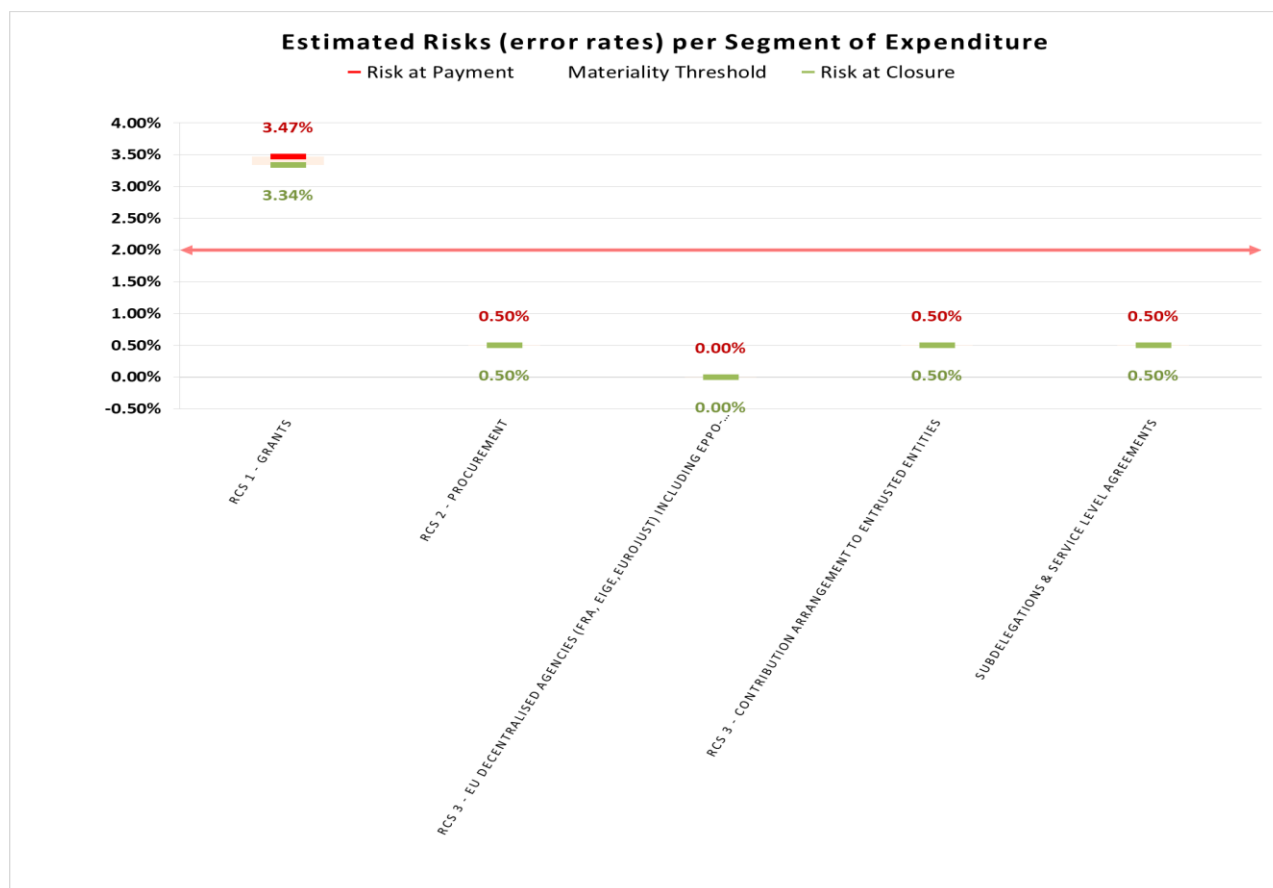
DG JUST's management concludes that the control results, presented in the sections that follow are complete and reliable and provide reasonable assurance about the achievement of the internal control objectives.

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<sup>(13)</sup> Includes EUR 5,1 million in C4, PO and RO credits to be implemented in 2026

## 2.1.2. Effectiveness of controls

### a) Assessment of control results per segment of expenditure



DG JUST's portfolio consists of three segments (grant, procurement and indirect management) with a relatively low error rate except for grants where the residual error rate was estimated at 3.13% leading to a reservation (see Annex 9 for further details)

#### Direct management – grants

As described in the Relevant Control System(s) for budget implementation for direct management grants (Annex 6), the analysis of the effectiveness with regard to legality and regularity is built around the three main control processes (stages): 1) programming, evaluation and selection of proposals; 2) contracting and monitoring, and 3) *ex-post* controls. Materiality is assessed in accordance with Annex 5.

#### **Stage 1: Programming, evaluation and selection of proposals**

This stage concerns the preparation and adoption of the annual work programmes, as well as the calls for proposals and their evaluation. The overall control objective of this stage is to ensure that DG JUST selects the proposals that contribute the most towards the achievement of the policy or programme objectives in terms of effectiveness and compliance.

In 2025, all 1497 proposals were fully evaluated in the course of the year and 82 projects were selected..

<b>Stage 1</b>	Number of projects evaluated: ↗ 1.497(801 in 2024) Number of projects selected: ↘ <b>82</b> (113 in 2024)
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### **Control benefits (Stage 1)**

The benefits of the Stage 1 – programming, evaluation and selection of proposals are not identifiable in quantitative or monetary terms.

In qualitative terms, the benefit of the evaluation and selection stages is conducive of a higher performance in reaching the objectives, better quality results of the call, best quality projects selected.

### **Stage 2: Contracting and Monitoring**

Contracting concerns the grant agreement preparation and signature of the legal commitment. The overall control objective of this stage is to ensure the optimal translation of each awarded proposal into a legally binding grant agreement. This is the main tool for ensuring best value for public money, effectiveness, economy and efficiency of the use of budget appropriations.

In 2025, DG JUST signed 52 projects from 2025 calls <sup>(14)</sup> (vs 80 in 2024 from calls 2024 and 2023).

Monitoring and *ex ante* control comprises follow up of the implementation of the project (timely submission of deliverables, quality of submitted deliverables), analysis of the final reports and *ex-ante* checks of beneficiaries' cost claims. The overall control objective is to ensure that operational results (deliverables) from the projects are of good value and meet the objectives set in the grant agreement and that the related financial operations comply with regulatory and contractual provisions costs statements may be accepted.

The effectiveness of controls for the legality and regularity of transactions is measured through the number of exceptions and non-compliance events recorded. The recording of the exceptions and non-compliance events for assessing the effectiveness of controls for the legality and regularity of transactions showed that in 2025 no exception and non-compliance events were recorded in relation to the contracting phase for grants.

<b>Stage 2</b>	Number of Grant agreements signed: ↘ <b>52</b> (80 in 2024) Value of Grant agreements signed: ↘ <b>EUR 35.8 million</b> (EUR 39 million in 2024)
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### **Control benefits (Stage 2)**

The controls in place aim to identify and prevent irregularities, allowing for immediate correction and avoid time-consuming recovery actions. The amount of costs rejected at this stage is relatively limited; only the most obvious ineligible costs can be detected at this stage. However,

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<sup>(14)</sup> To be noted that, in 2024, 69 projects from calls 2023 were also signed.

these *ex-ante* controls are important as they have an informative effect on the beneficiaries. This can be considered as a quantifiable benefit of the monitoring phase in 2025.

**Stage 3: Ex-post control**

The third stage includes the *ex-post* audits as well as the correction of any sums being paid incorrectly. The overall control objective of this stage is to detect and correct any error or fraud remaining undetected after the implementation of *ex-ante* controls.

<b>Stage 3</b>	Average amount of a grant audited: <b>EUR 235.828,63</b> (351.364,19 in 2024)
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The cumulative residual error rate for the two programming periods 2014-2020 and 2020-2027 is estimated at 3.13 %. The total number of final audit reports received in 2025 is 20. Out of this number, 17 from the AWP 2024, 3 from the AWP 2023.

**Control benefits (Stage 3)**

There are several **qualitative** benefits resulting from the controls operated during the different control stages:

Stage 3: *Ex-post* controls have a deterrent and learning effect for beneficiaries, helping to reduce errors in future cost declarations. It enhances the beneficiaries’ discipline for correctly reporting eligible costs by demonstrating that their probability to be audited is not negligible. It contributes to the clarification of rules and guidance by feeding back results and findings from *ex-post* audits.

**Direct management – procurement**

The control system for direct management procurement is grouped around three core processes: procurement procedures, financial operations, and supervisory measures.

**Stage 1: Procurement procedures**

The first stage concerns the calls for and evaluation of tenders, starting from the moment of planning and needs assessment until the selection of and award to suppliers. The overall control objective at this stage is to ensure that DG JUST selects the offers that contribute the most towards the achievement of the policy or programme objectives in terms of effectiveness and compliance.

In order to reach a conclusion on the adequacy of management of risks relating to the legality and regularity of its tendering procedures and efficiency and economy of its controls, DG JUST reviewed:

- Reporting of exceptions and non-compliance events, defined as control overrides or deviations from policies and procedures: during the reporting year, there are 1 exception and 4 non-compliance events registered in the related register (vs. 4 exceptions and 8 non-compliance events registered in the related register in 2024).

- As a result of these controls, no tender projects were cancelled, no negative opinions or rejections were issued, and no redress procedures were encountered. This shows that the controls put in place work correctly.

<b>Stage 1</b>	Value of contracts signed: ↘ <b>EUR 18.6 million</b> (28.9 million in 2024) Number of contracts: ↗ <b>318</b> (179 in 2024)
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### **Control benefits (Stage 1)**

The benefits of the Stage 1 are partially quantifiable (best offers are selected).

Due to effective selection criteria, a sufficient number of good quality offers were received during 2025.

### **Stage 2: Financial transactions/monitoring**

The second stage concerns the management of the contracts and payments made. This stage comprises *ex-ante* checks of contractors' invoices and the processing of transactions. The overall control objective is to ensure that operational results (deliverables) are of good value and meet the objectives and that the related financial operations comply with regulatory and contractual provisions.

There were no errors detected, nor penalties applied. The value of the contracts signed in 2025 was higher than in 2024 due to contracts value increased for signed communication campaign and the average value of signed contract studies. The increase in absolute numbers of payments can be explained by the fact that in view of transition to SUMMA DG JUST tried to anticipate payments as much as possible to increase the implementation of the budget of year N in year N.

<b>Stage 2</b>	Value of payments made: ↗ <b>EUR 45,5 million</b> (39 million in 2024) Number of payments: ↗ 922 (656 in 2024)
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### **Control benefits (Stage 2)**

Due to mitigating *ex-ante* controls in place, irregularities, errors and overpayments are prevented, and systematic weaknesses are corrected.

### **Stage 3: Supervisory measures**

No *ex-post* audits are performed for contracts within DG JUST. Audit findings signalled by the other internal or external auditors (Internal Audit Service and European Court of Auditors) are duly considered for the assessment of assurance in relation to procurement transactions. For a conservative and prudent approach, a rate of **0.5% for procurement segment** has been used as the best estimate of the possible amount at risk, For the conservative approach also for the contribution arrangement to entrusted entities and sub delegation and service legal agreement a rate of 0,5 % was used in 2025

## *Supervision of EU bodies (executive agencies, decentralised agencies and other union body).*

### *Decentralised agencies and Union body EPPO*

DG JUST acts as partner DG for three decentralised agencies and one Union body (the EPPO) which contribute to the implementation of various Union policies and are financed via contributions from the EU budget voted each year by the EU budgetary authority (i.e. the European Parliament and the Council) the Institute for Gender Equality (EIGE), the Fundamental Rights Agency (FRA), the European Agency for Judicial Co-operation (EUROJUST) and the European Public Prosecutor's Office (EPPO).

The overall control objective is to ensure that DG JUST is timely and fully informed of any relevant management issues encountered by the agencies, in order to possibly mitigate any potential financial and/or reputational impacts.

DG JUST takes part in the governance of the agencies by serving as a member of their Management Boards (referred to as the 'College' at Eurojust) and of their Executive Boards (except for EIGE, which has no Executive Board). The Commission holds one voting right in EIGE's Management Board, one voting right in Eurojust's College, and two voting rights in FRA's Management Board. The Commission is a member of the Executive Boards at FRA and Eurojust, where it also has voting rights.

Monitoring of the agencies' policy activities:

The monitoring of the agencies' activities is the main responsibility of the relevant policy units. They are involved in numerous contacts at working level, coordination meetings, providing opinions on annual work programme, draft budget, establishment plan and monitoring of their implementation.

DG JUST does not take part in the governance of the EPPO, which is a Union body independent from the Commission and all the other EU institutions as well as from the Member States.

Executive agency- EACEA

DG JUST is one of the parents DGs of the European Education and Culture Executive Agency (EACEA), which implements the legacy of the Europe for Citizens Programme and most of the actions under two objectives of the CERV programme: Promote citizens engagement and participation in the democratic life of the Union and Protect and promote Union values.

DG JUST co-delegates the corresponding administrative credits for the functioning of EACEA to DG EAC who then disburses these funds to EACEA, consequently no payments fall under DG JUST remit.

During 2025, EACEA implemented all actions foreseen in its work programme related to the programme. The supervision arrangements are defined in the general Memorandum of Understanding between EACEA and its parent DGs and in the Working Arrangements which cover the specificities of the programmes in the implementation of which the Agency is involved. The director of the executive agency must put in place cost-effective internal control systems suited to the performance of the activities delegated to the agency and for communicating it to the

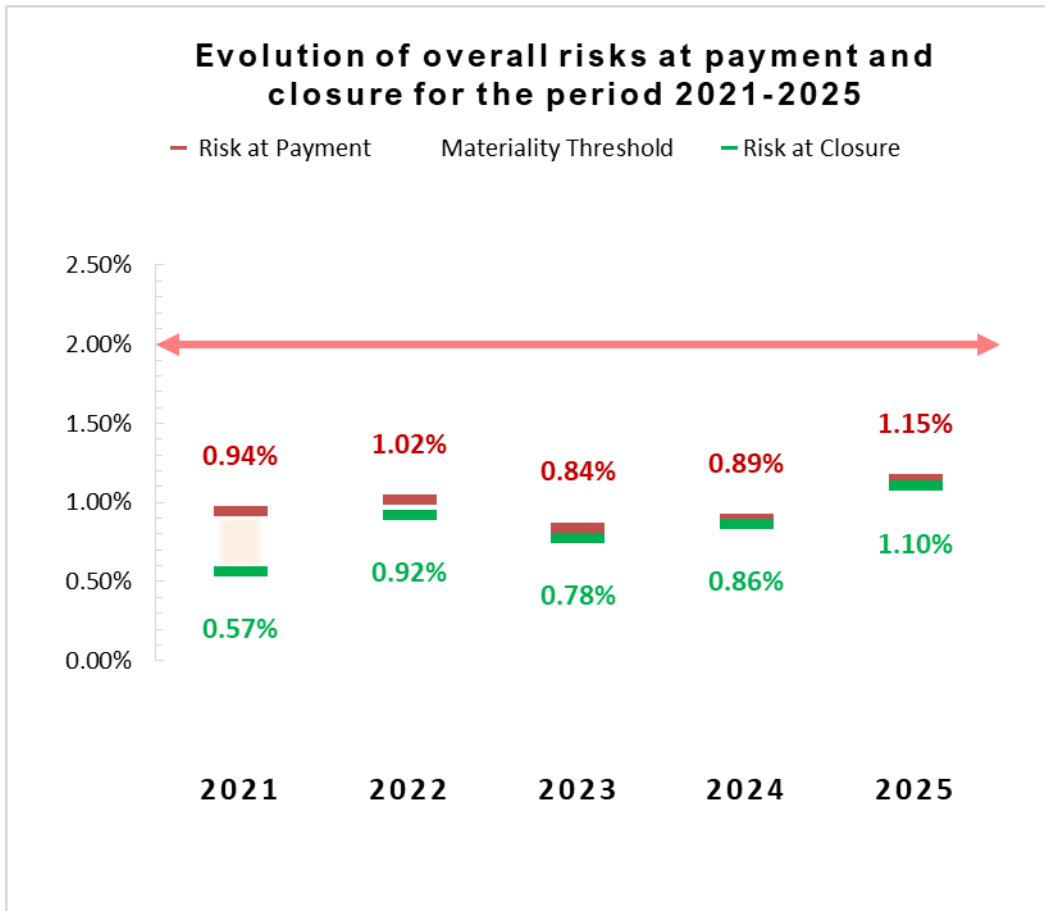
Steering Committee when established or adjusted. The EACEA director, which is the authorising officer delegated directly by the College, reports the results of the annual assessment of its effective implementation to the Steering Committee in the context of the AAR reporting cycle.

Executive agency- EISMEA

DG JUST is one of the parents DGs of the European Innovation Council and SMEs Executive Agency (EISMEA), which implements the legacy of the Consumer Programme.

DG JUST participates in the governance of the Executive Agency (EISMEA) which started its mandate on the 1 April 2021. The supervision arrangements are defined in the general Memorandum of Understanding between EISMEA and its parent DGs and in the Working Arrangements which cover the specificities of the programmes in the implementation of which the Agency is involved. DG JUST liaises with the Agency to ensure operational supervision, a regular flow of information and a timely input for the preparation of calls. EISMEA implements around 70% of the Consumer budget. Furthermore, the Director of the Directorate B is a member of the EISMEA Steering Committee and participates in the meetings (four times a year) where the most important issues are discussed and where the decisions are taken by vote of all parent DGs. There is no open audit recommendations related to the Consumer part of the SMP budget implemented by EISMEA.

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



The estimated overall risk at payment for 2025 expenditure is the AOD's best conservative estimate of the amount of relevant expenditure during the year that is not in conformity with the contractual and regulatory provisions applicable at the time the payment was made. A proportion of the underlying errors will be corrected in subsequent years and until the end of the programming cycle, corresponding to the conservatively estimated future corrections for 2025 expenditure. The difference between the risk at payment and the estimated future corrections results in the estimated overall risk at closure <sup>(15)</sup>.

There is a slightly increasing trend since 2023 mainly due to the increase in the grant sector of relevant expenditures, explained by more cleared pre-financing in respect of previous years. In 2025, DG JUST has processed a higher number of final payments for grants than in 2024 which meant that translated in higher cleared prefinancing amounts in 2025. Moreover, the COM reorganisation with the transfer of grant files from DG HOME and DG EMPL also contributed to the increase in the cleared prefinancing amounts. On the other hand, the level of new prefinancings has decreased in 2025 as compared to 2024, reflecting the programming cycle of

<sup>(15)</sup> This is the AOD's best, conservative estimation of the expenditure authorised during the year that would remain not in conformity of applicable regulatory and contractual provisions by the end of implementation of the programme.

the calls for grant which further contributed to increasing the levels of relevant expenditure in 2025.

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

### ***c) Quantitative benefits of controls: Preventive and corrective measures***

With its *ex-ante* and *ex-post* controls, DG JUST has an effective mechanism in place for detecting and correcting errors, no preventive and corrective measures for 2025. *Ex-ante* controls resulted in preventive measures of EURO,0million and *ex-post* controls resulted in corrective measures of EURO,0 million. Please see details in annex 3.

Compared to 2024, with EURO.489 million and EURO.256 million respectively, there is an increase, that is mostly explained by putting in place a system to better monitor and report.

### ***d) Assessment of control results for non-expenditure items (if applicable)***

DG JUST manages intangible assets which are IT applications and are cumulated from 2012 (EUR 19.83 million).

The key control objectives for the DG are to ensure that these assets are appropriately accounted for and safeguarded, that information managed by these assets is protected by implementing appropriate authentication and authorisation mechanisms and that weaknesses, errors, irregularities and losses are detected and addressed. In the revision programme on DG JUST accounts, controls are put in place to verify if the cost-centre is correctly encoded and verify if the applications entered the Production Phase.

Assets owned by DG JUST follow the international accounting rules and the closure guidelines established by the Commission accounting officer. The control objectives are fully met.

### ***e) Fraud: prevention, detection, and correction***

DG JUST has developed and implemented its own anti-fraud strategy since 2012, based on the methodology provided by OLAF. It is updated every three years and was last updated on 22 May 2024 following a fraud risk assessment. Its implementation is being monitored and reported to the management annually. Some of the key actions taken in 2025 include: 8 monitoring visits in case of suspected fraud in the implementation of grants, and the DG JUST staff survey to assess the level of awareness on fraud and ethics matters. Almost all actions planned for 2025 have been implemented. The anti-fraud information session in DG JUST with OLAF and DG HR experts planned for 2025 was postponed to 2026 for two reasons: (1) after discussion it was concluded that there was no imminent need for it and it could be organised in 2026, and (2) OLAF is revising their training offer/methodology.

Concerning action 30c of the Commission Anti-Fraud Strategy Action Plan 2024-2026 (ensure effective cooperation between the Commission and the European Public Prosecutor's Office (EPPO), notably by assessing potential compliance issues with the Member States' transposition and implementation of the PIF Directive) DG JUST is in the lead, and assessed the conformity of the Member States' transposition and implementation of the PIF Directive in this light.

In this context, 5 PIF infringement cases concerning the non-conformity of legislations with the PIF Directive have been closed; In one case an Additional Letter of Formal Notice were sent and 1 reasoned opinion was issued against another Member States.

As co-lead service for action 32 on the protection of investigative journalists, DG JUST adopted the European Democracy Shield in November 2025. For protection of journalists, it includes reinforced financial support for independent and local journalism to be provided under the new Media Resilience Programme, an Update of the Commission's Recommendation on the Safety of Journalists and step up action to support the EU's existing framework to combat abusive lawsuits against public participation (SLAPPs).

In 2025, following the middle scale reorganisation, the Anti-Corruption team joined DG JUST from DG HOME. As a result, action 38 is now also co-lead by DG JUST. Pursuant to action 38, DG JUST pursued negotiations with the co-legislators throughout the year on a Directive on combating corruption and a provisional political agreement was reached between the European Parliament and the Council in December 2025. DG JUST also organised the third plenary meeting of the EU Network Against Corruption and held other activities under this banner, including a number of national workshops in Member States.

Corrective measures based on OLAF recommendations are reported on in the context of annual monitoring exercises conducted by OLAF, in accordance with Article 11 of [Regulation 883/2013](#).

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

### 2.1.3. Efficiency of controls

**Regarding the efficiency of controls**, DG JUST assessed it based on "time-to" indicators, measuring the time spent to complete a specific procedure. Concerning grants, in 2025, the time-to-inform was 160 days, this represents an increase compared to 149 days in 2024 and this is explained by high numbers of proposals received which had a proportional effect on the time to evaluate (i.e. numbers of evaluators, numbers of days needed to evaluate) however this indicator is still under the limit of 180 days specified in Financial regulation

The time-to-sign (TTS) was 58 days in 2025, as compared to the 104 in 2024.

Globally, the 'time-to-grant' remains under the 9 months which represent the total duration needed for 'time-to-inform' (6 months) and 'time-to-sign' (3 months) as foreseen by the Financial Regulation (FR Article1947).

<b>Direct management</b>	Time-to-inform: <b>↗160 days</b> (149 in 2024, limit Art. 194.2 FR is 180) Time-to-sign: <b>↘ 58 days</b> (104 in 2024, limit Art. 194.2 FR is 90)
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<b>All</b>	<b>Procurement</b> time-to-pay: <b>↘ 23 days</b> (24 in 2024) <b>Indirect Management- Entrusted Entities</b> time-to-pay: <b>17 days</b> (17 in 2024)
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Time-to-pay takes into consideration both pre-financings and final payments, being a weighted average. In 2025, DG JUST made more final payments and less pre-financings compared to 2024. In addition, the average time to pay for final payments improved thanks to the efforts made to reduce the number and the length of suspensions.

At the level of the payment transactions performed in DG JUST, the efficiency indicators show that DG's overall average payment time for the year amounted to 25 days and 98% of all payments in terms of amount were made on time.

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

Very good performance for the rate of **late payments** was noticed in 2025 as a result of actions that were taken to closely monitor the payments and to increase awareness among staff directly involved in the process.

In conclusion the controls put in place by DG JUST proved to be efficient.

## 2.1.4. Economy of controls

Following the Commission central services' guidance, the cost of the controls at Commission level is assessed by the cost of the different control stages. The overall assessment for each management mode is obtained from the ratio between all those costs and the total amount paid in the year for the related management mode.

The Full Time Equivalents (FTEs) used for the calculation have been provided by the different Directorates of DG JUST and the average FTEs costs used are the average FTEs costs communicated by DG BUDG which include external evaluators.

### Costs of controls at DG JUST level

DG JUST has analysed the estimation of the cost of control in relation to the value of the payments made in 2025 per control system (Annex 6) and over the last two reporting years in order to draw conclusions on trends.

As a general overview, the total cost of controls performed in 2025 in DG JUST was estimated at EUR 14.29 million, representing 4.65% of total payments made in the year and slightly

decreased compared with the 2024 results. The decrease in the overall rate is mainly due to the increase of overall average FTE cost by 6% and number of staff in both grant and procurement segment due to more complicated files that requested more investment (Terms of reference for complex studies) and a lot of events.

For the entrusted entities, the overall cost of control remained nearly stable, a small increase can be seen in the subsidies paid and this mainly in relation to EUROJUST and the EPPO. The below table provides exhaustive information on the data analyzed by DG JUST to draw this conclusion.

Control System	2025			2024		
	Costs (M EUR)	Payment (M EUR)	Costs/payment (%)	Costs (M EUR)	Payment (M EUR)	Costs/payment (%)
Direct Management - Grants	7.16	67,59	10.6%	7.16	71,03	10.08%
Direct Management - Procurement	6.25	45,8	13.64%	6.07	39,01	15.57%
Indirect Management- Entrusted Entities and contribution agreements	0,86	199,59	0.43%	0,66	182,89	0.36%
<b>Total</b>	14.29	312,12	<b>4.56%</b>	13.89	293,12	<b>4.74%</b>

Details about the estimated cost of the control activities provided by REA, are reported in the Annual activity report of REA.

### 2.1.5. Conclusion on the cost-effectiveness of controls

**Based on the most relevant key indicators and control results reported above, DG JUST has assessed the effectiveness, efficiency and economy of its financial management and reached a positive conclusion on the cost-effectiveness of the controls for which it is responsible. Regarding the cost-effectiveness of controls,** the conclusion was reached on the basis of an estimation of costs of control over the value of the related funds (value of

payments), in the form of indicators and their evolution over time for each of the distinct control systems and stages described in Annex 6. Details are presented in Annex 7.

Despite the challenging year (2025), DG JUST managed to almost keep the same level for the cost of control indicator and at the same time to register some improvements of almost all 'time-to-pay' indicators. These performances were possible thanks to the motivated and dedicated team and to further simplifications introduced during the year and the generalisation of IT use.

Furthermore, there are several non-quantifiable benefits resulting from the controls operated during the programming phase in the grant management process, aimed at ensuring that the financed projects contributed to the achievement of the policy objectives, and from the deterrent effect of *ex post* controls. At the same time, procurement procedures are to a large extent based on regulatory requirements which cannot be curtailed. DG JUST considers that the necessity of these tasks is undeniable, as shown by the risks outlined in Annex 6, significant proportions of the appropriations would be at risk in case they were not in place.

The DG's relative <sup>(16)</sup> level of cost-effectiveness is considered adequate. In 2025, DG JUST continued to apply the risk-based approach for verification of the final cost claims in view of different risk profiles of the beneficiaries and completeness and accuracy of the provided documentation with the aim to re-direct the control resources towards more stringent controls where needed, while having leaner and less burdensome controls where appropriate.

DG JUST is of the opinion that the current control system applied is the best suited to fulfilling the relevant control objectives efficiently and at a reasonable cost. It represents a good balance between the invested efforts (internal control costs and remuneration fees), the obtained error rates (effectiveness of controls) and delivery of objectives (efficiency).

## 2.2. Audit observations and recommendations

This section sets out briefly the state of play for all audit observations and recommendations reported by auditors related to internal control and financial management. Further details for IAS and ECA audits can be found in Annex 8.

Where an audit has detected weaknesses affecting an internal control principle or the department's assurance, a detailed analysis is provided further below in Section 2.3 and, where applicable, the incidence on the AOD's assurance is presented in Section 2.4, accordingly.

During 2025, DG JUST did not have any critical or very important recommendations issued either by IAS or by ECA.



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<sup>(16)</sup> E.g. taking into account the relative labour-intensity of the operations, which may imply (dis)economies of scale due to the number and value of the transactions

Internal Audit Service

During 2025 DG JUST did not have any critical or very important recommendations issued by IAS.

European Court of Auditors

Reported	Audit Title	Accepted Recommendation	State of play in 2025	Impact on the assurance for 2025
2024	Statement of Assurance (DAS)	N/A		

<b>State of play</b>		<b>Assurance</b>	
 Action plan implemented	 Action plan implementation is ongoing	 No impact on the assurance	 Impact on the assurance
 Preparation of the action plan			

## 2.3. Assessment of the effectiveness of internal control systems

The Commission has adopted an Internal Control Framework based on the highest international standards. <sup>(17)</sup>

DG JUST has adapted the Internal Control Framework to its specific characteristics and organisational structure. The internal control systems are suited to achieving its policy and internal control objectives in accordance with the internal control principles, having due regard to the risks associated with the environment in which it operates.

In line with the Commission's Internal Control Framework DG JUST has assessed its internal control system during the reporting year and has concluded that it is effective and the components and principles are present and functioning well overall, but some improvements are needed as minor deficiencies were identified related to principle 10 component 3. The improvements and/or remedial measures implemented or envisaged are referring to the internal control strategy for and for this a draft was prepared and will be finalized during the year.

The internal control self-assessment exercise was performed between November 2025 and February 2026 in compliance with the methodology proposed by DG BUDG. It was based on desk reviews of information from various sources, ad hoc discussions with specialized functions (HR, financial management) and the evaluation of monitoring indicators, taking also into account:

- the authorising officers by sub-delegation reports
- the results of audits and follow-up engagements performed by IAS and ECA during 2025
- the status of implementation of action plans from previous IAS/ECA audit work
- the results of the risk assessment exercise
- the analysis of the register of exceptions and non-compliances.

The assessment was carried in accordance with the methodology established in the 'Implementation Guide of the Internal Control Framework of the Commission' evaluating all five components and 17 principles. The results show that all 17 principles are present and 16 of them are fully functional.

As a result, four of the five components of the internal control system are present and functioning (component 1 Control Environment, component 2 Risk Assessment, component 4 Information and Communication and component 5 Monitoring Activities). Component 3 Control Activities is present and functioning with the minor improvement needed of putting in place a control strategy at the DG level. A draft control strategy was prepared, but it needs to be further developed based on the new Guidance on the establishment of a Control Strategy for financial operations prepared by BUDG in 2025.

The exercise did not result in the identification of any further weaknesses, errors, or actions that could jeopardize the overall effectiveness of DG JUST's internal control system. During the annual

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<sup>(17)</sup> The Committee of Sponsoring Organisations of the Treadway Commission Internal Control Integrated Framework, the golden standard for internal control systems.

risk management exercise performed in the context of the management plan, and subsequent mid-term review, no critical risk was identified.

The issued reservation does not have an impact on the internal controls of DG JUST, moreover the increase in error rate is mainly explained by exceptional audit findings that are not expected to repeat in the future.

## 2.4. Conclusions on the assurance

The information reported in Section 2.1 stems from the results of management and audit monitoring, based on the results of the self-assessment, *ex-post* controls, the observations of the Internal Audit Service, lessons learnt from the reports of the Court of Auditors as well as information received from other authorising officers in cases of cross sub-delegations or delegation agreements.

These reports result from a systematic analysis of the evidence available. This approach provides sufficient guarantees as to the completeness and reliability of the information reported and results in a comprehensive coverage of the budget allocated to the Director-General of DG JUST.

The key arguments for the assurance are listed below:

- Overall, DG JUST internal control system is effective, and the components and principles are present and functioning well overall. Some improvements are needed as minor deficiencies were identified related to principle 10 component 3 Control Activities. Nevertheless, positive results were registered in terms of legality and regularity, cost-effectiveness.
- No critical issues highlighted by internal or external auditors.
- For DG JUST, the estimated overall amount of risk at payment for 2025 is EUR3.68 million. This is the AOD's best conservative estimation of the amount of expenditure authorised during the year (EUR 312.99 million), not in conformity with the applicable contractual and regulatory provisions at the time the payment is made. This expenditure will be subsequently subject to *ex-post* controls and a sizeable proportion of the underlying error will be detected and corrected in successive years. The conservatively estimated future corrections for those 2025 payments made are EUR 0.13 million. This is the amount of errors that the DG conservatively estimates to identify and correct from controls that it will implement in successive years.
- No other major issues pointed out by the Authorizing Officers by Sub-delegations in their reports.

Methodology for determining materiality level for reservations.

The materiality is determined for each relevant distinct internal control system across various Activity-based budgeting lines ('horizontal' approach). The main distinct internal control systems are (a) direct management – grants, (b) direct management – procurement and (c) indirect management (EU subsidies to decentralised agencies). These layers are determined by the differences in the *ex-ante* and *ex-post* control approach put in place in DG JUST to control and obtain assurance for each type of expenditure – each control approach and results are described

in more detail throughout Chapter 2 and in Annex 6 Relevant Control System(s) for budget implementation (RCSs).

The residual risk was analysed for each distinct control system, as detailed in Section 2.1, and the results of each were analysed separately to determine its impact on assurance and a need to issue a reservation.

The estimated multiannual residual error rate for the grants directly managed by DG JUST for 2025 is 3.13% and remain stable compared to last year (3.13%). The Detected Error Rate in 2025 slightly decreased compared to 2024 (3.48% in 2025 vs 3.52% in 2024). This may be explained by the fact that there were no significant audit corrections in 2025 as there were in 2024. This needs to be further implemented - DG JUST corrected 94% of the errors detected by the auditors. However, the Residual Error Rate followed the same tendency as the detected error rate

For the CERV/ JUSTICE programmes, the audit services use an audit sample that is a combination of randomly selected transactions and a selection of high value transaction. This sample is representative of the population of transactions but not statistical. Consequently, the resulting error rate is an estimate that is not statistically determined, there is no confidence level and confidence interval, but that gives an indication on the level of error for this expenditure.

Following ECA observation on the error rates for the Research family, the error rate was recalculated. As per instructions, the detected error rate is to be calculated based on the following methodology: final errors detected/audited amount of the grant (as amount declared by the beneficiary \* percentage of audit coverage as indicated in the final audit reports).

Reservation	Financial Impact (in m EUR)		Residual error rate 2025	Evolution
	2024	2025		
Financial risk corresponding to the residual error rate in the non-audited population of grants in the programmes managed by DG JUST	1,86	1,96	3,13%	Maintained

In conclusion, based on the elements reported above, management has reasonable assurance that, overall, effective controls are in place and working as intended; risks are being appropriately monitored and mitigated; and necessary improvements and reinforcements are being implemented. The Director-General, in her capacity as Authorising Officer by Delegation has signed the Declaration of Assurance albeit qualified by a reservation concerning: Financial risk corresponding to the residual error rate in the non-audited population of grants in the programmes managed under the budget chapters 07 06 and 07 07.

## 2.5. Declaration of Assurance and reservations

Declaration of Assurance

*I, the undersigned,*

*Director-General of Justice and Consumers*

*In my capacity as authorising officer by delegation*

*Declare that the information contained in this report gives a true and fair view <sup>(18)</sup>.*

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

*This reasonable assurance is based on my own judgement and on the information at my disposal, such as the results of the self-assessment, ex-post controls, the work of the Internal Audit Service [and the lessons learnt from the reports of the Court of Auditors for years prior to the year of this declaration.*

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

*However, the following reservations should be noted: Reservation regarding the financial risk corresponding to the residual error rate of 3.13% in the non-audited population of grants in the programmes managed by the Directorate General Justice and Consumers under the budget chapters 07 06 and 07 07. More details are provided in annex 9.*

*Brussels, date 14/04/2026*

*Signed*

*Ana Gallego*

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<sup>(18)</sup> True and fair in this context means a reliable, complete and correct view on the state of affairs in the DG/Executive Agency.

## **3. A MODERN AND SUSTAINABLE PUBLIC ADMINISTRATION**

### **3.1. Human resource management**

In 2025, following the start of the new Von der Leyen Commission, a middle-scale reorganisation was conducted with one new unit joining DG JUST from DG EMPL (disability) and one new sector joining DG JUST from DG HOME (anti-corruption). At the same time resources were allocated to other departments, notably the EU coordinators for the fight against anti-Muslim hatred, antisemitism and the Article17 dialogue and the respective team moved to the Secretariat-General.

In 2025, to ensure the effective management of human resources and to optimise the capacity to deliver on priorities in its management plan, DG JUST continued to closely monitor the resources allocation in light of shifts in political priorities to ensure resources are available to support the DG JUST's ambitious agenda. This includes optimising internal mobility and/or making strategic use of temporary reinforcements.

To invest in continuous learning and development, DG JUST has implemented its annual learning and development plan funding training activities to equip staff with the required expertise. It has also participated to all corporate - initiatives (management development programme, JPP, certification etc.) to grow talent and provide career development perspectives to staff.

DG JUST remained committed to creating a work environment that promotes staff well-being and engagement. The JUST Well-being Charter (adopted in 2024) served as a guiding framework to ensure and develop a healthy, inclusive, and compassionate workplace where staff can thrive. This combined different actions under the JUST action plan (e.g. welcoming newcomers to the DG, various conferences/training sessions or online well-being sessions (well-being online sessions sharing our passions), including efforts to enhance efficiency and effectiveness. A co-development project for middle-management was jointly implemented in 2025 with DG HOME. Regular meetings of female managers were organised following a dedicated training in 2024 also organised in cooperation with DG HOME.

DG JUST proceeded with its efforts to ensure a diverse, fair, and inclusive workforce that reflects European values. It remained committed to gender equality with a further first female manager appointment in 2025. By the end of 2025, 55% of DG JUST middle managers were women.

Overall, the staff engagement index stood at 77% and remained relatively stable (+1 percentage point) in comparison to 2023.

## 3.2. Digital transformation and data management

In 2025, DG JUST continued to pursue the strategic objectives of the Commission's digital strategy. This work covered internal processes in the DG as well as EU cross-border judicial cooperation.

DG JUST's commitment to digital-ready policymaking has led to the IT dimension being more prominent in DG JUST's policies. Digital aspects of legislation continued to be analysed and addressed at early stages of policymaking. DG JUST's legislative coordinating unit and the IT units worked to build the necessary capacity for screening and analysing the digital aspects in the legislation proposed by DG JUST. In the context of the Digitalisation of Justice legislative package, DG JUST continued to develop the aspects of IT architecture, Business Process Modelling, data exchange formats and interoperability with existing national systems, together with Member States and the Directorate-General for Digital Services (DG DIGIT). Likewise, in the policy domain of Equality, the IT department worked closely with the policy team to establish the key elements of the delegated act on physical European disability card and European disability parking card, including interoperability and harmonising processes.

To ensure a customer-centred approach, stakeholders continued to be involved in the ongoing maintenance of IT systems. For example, as in the case of the Justice Digital Exchange system (JUDEX – based on re-usable building blocks and the e-CODEX), where Member States' representatives are members of IT's system' steering committees or comitology committees are tasked with defining IT business specifications.

In areas like once-only, cross-border cooperation and interoperability, DG JUST made further progress by developing new functionalities to support judiciary cooperation enabling point-to-point exchange of service of documents and taking of evidence in civil proceedings. Progress was made also by enhancing the interoperability capabilities of the Safety Gate system and further interconnecting it with online marketplaces and consumer protection authorities.

In the same vein, to better serve citizens and professionals in the judiciary, in March 2025 the new e-Justice Portal, as well as one of its major satellite system the European Case Law Identifier (ECLI) was launched.

DG JUST continued to follow the dual pillar approach set out in the Commission's digital strategy and the 'cloud first' policy, upholding data protection and security safeguards. Particular attention was also paid to the corporate digital sovereignty action plan and its key principles: prioritising resilience, reducing dependencies on proprietary solutions and fostering interoperability.

The IT portfolio of DG JUST includes solutions catering for the justice system of EU Member States. All solutions are developed and maintained by DG JUST with a small team, managing more than 140 IT consultants, many of them teleworking full time from abroad, while some systems are implemented by DG DIGIT, DG GROW and the eu-LISA Agency. These numbers are continuously increasing because most of the new legislation of DG JUST will have an IT component requiring to build additional IT systems on top of the ones that are under the remit

of DG JUST. In this context, the current delivery model has become fragile given the magnitude of the new demands, the complexity of technologies and multiple cyber threats. Due to its design, it does not seem to be sustainable in the long-term. DG JUST is actively seeking solutions to mitigate the risks related to this delivery model.

As part of this approach DG JUST investments have been focused on the latest cloud solutions brokered by DIGIT, benefiting from new technologies such as AI. In this context the e-Surveillance is the first system to leverage AI for classifying and comparing information in the Safety Gate alerts with information available on the online marketplaces.

40% of DG JUST's IT systems are using cloud infrastructure services.

On cybersecurity, 91% of the IT Systems owned by DG JUST have up to date security plans. This is monitored by the DG JUST IT team in collaboration with the DIGIT's c-LISO service. Regular sessions to share best practices and updates were held by the team. To ensure implementation of all security controls and security plans for new systems and the continuous monitoring and update of the existing systems, DG JUST created guidelines along with specific processes for creating and updating security plans.

In line with the Commission's cybersecurity strategy for 2025-2026, DG JUST has reinforced its staff's cybersecurity culture by promoting attendance to corporate cybersecurity awareness and training activities. The aim is to achieve a participation of rate of 35% of DG JUST staff in one or more cybersecurity awareness and training activities, as well as to maintain a low phishing email click rate in the periodic staff exercises.

In 2025 DG JUST has sought to raise awareness on available corporate AI tools by organising an AI Fair, which turned out very useful for policy staff and is expected to trigger improved internal processes and overall productivity.

To ensure that staff can get the most out of AI tools and navigate the ever-evolving technological landscape, DG JUST has actively encouraged staff to take specialised AI corporate training courses, as well as training courses on the efficient use of M365 tools: over 400 staff attended unit-specific training sessions on Teams.

DGJUST colleagues have been involved in corporate networks, including the AI@EC TEAMS channel, the GPT@EC TEAMS channel and in training courses offered centrally in the EU LEARN catalogue. In 2025, 30% of staff have completed at least one IT training course.

In 2025, DG JUST ensured continued compliance with data protection requirements by maintaining the systematic monitoring and updating of its processing operations in the Data Protection Management System. The review and updating of records older than two years continued, supporting the ongoing alignment between processing activities and documented records. DG JUST applied established administrative practices for the handling of data subjects' rights and personal data breaches, with the support of the Commission's Data Protection Coordinator (DPC). Targeted awareness-raising activities titled 'Data Protection Crash Course' were given to staff by the DPC. The course addressed practical data protection issues relevant to the DG. These activities reached 228 staff, contributing to strengthened data protection awareness and compliance across the department.

The percentage of staff trained on data protection compliance, combined with the percentage of public records of processing operations that have been reviewed within the last two years stood at 53.66% for 2025.

In 2025, DG JUST kept existing data assets up to date and aimed to improve data maturity by assigning data owners and data stewards to assets where it was missing, fixing broken links. When it comes to the four dimensions of data maturity, the indicator value in 2025 is 'established' in relation to data management, and 'developing' in relation to ownership and responsibilities, data quality and data skills.

### 3.3. Sound environmental management

In 2025, DG JUST continued to actively participate in the Building Energy Savings Together (BEST) summer and winter building closures. It also continued to abide by the Commission's guidelines for sustainable events, and missions, which aim at reducing overall CO<sub>2</sub> emissions. The reduction in emissions is mainly due to lower mission budgets, which have significantly limited travel, combined with the lasting impact of COVID-19, which accelerated the shift to remote work and virtual meetings. In parallel, improved practices—such as optimising travel, prioritising rail, and more rigorously assessing the necessity and added value of trips—have further reduced the need for physical travel.

