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ACTIVITY REPORT OF THE SUPERVISORY COMMITTEE OF OLAF – 2025

(C/2026/3570)

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Foreword

In 2025, the Supervisory Committee of the European Anti-Fraud Office (OLAF) continued to carry out its work in line with the priorities set out in the OLAF Regulation (Regulation (EU, Euratom) No 883/2013) and its established working practices. In the second half of the year, in particular, the Committee's activities were also shaped by the European Commission's White Paper for the Anti-fraud Architecture Review, which launched a broader reflection on the future of the EU anti-fraud architecture.

As one of the actors within this architecture, the Committee actively followed and contributed to this evolving discussion. The Committee considers this initiative particularly important, as fraud and corruption undermine public trust, distort fair competition and weaken the financial foundations of the EU. Sharpening the legal framework and modernising the way the anti-fraud system operates would enable the EU to stay ahead of increasingly sophisticated fraud risks, while further supporting the impact of OLAF and the role of its Supervisory Committee.

— One of the Committee's major contributions to the review of the EU's anti-fraud architecture, and a central focus of its work in 2025, was a comprehensive and independent assessment of the application and impact of the OLAF Regulation. The Committee's opinion on this matter, as with all its work, is firmly grounded in evidence. By examining OLAF's case files and investigative practice, the Committee sought to understand how the system operated in reality. When systemic challenges emerged, the Committee looked beyond individual cases to identify their underlying causes. This approach ensures that its recommendations address root causes and provide meaningful guidance for strengthening the EU's anti-fraud framework.

— The Committee suggested improvements to the legal framework and operational practices from three key perspectives: (i) the boundaries of OLAF's investigations, including its mandate and independence; (ii) the conduct of investigations, including their duration, procedural guarantees and cooperation with other actors within the anti-fraud architecture; and (iii) the effectiveness and added value of OLAF's recommendations.

— In 2025, the Committee also focused on another critical aspect of the cooperation framework: OLAF's duty to report suspected criminal conduct to the European Public Prosecutor's Office (EPPO). The analysis examined how OLAF collects and assesses relevant information before deciding whether to report a case, and whether such decisions are taken independently, without undue delay, and in full compliance with the applicable legal framework. The Committee's analysis is currently being finalised and will be presented in a dedicated opinion, which the Committee intends to adopt in the first half of 2026.

— Furthermore, in 2025, and in line with its annual practice and the OLAF Regulation, the Committee examined OLAF's preliminary draft budget (PDB) for 2026 and adopted a corresponding opinion. The Committee considered that OLAF's 2026 PDB provided a sound basis for enabling the Office to fulfil its mandate and tasks under the OLAF Regulation. At the same time, the Committee underlined that any further reductions in OLAF's human resources should be subject to thorough and careful evaluation of their potential impact on OLAF's performance and its ability to carry out its core functions. The Committee also emphasised the importance of developing and deploying artificial intelligence tools for stepping up the detection and prevention of fraud, noting that additional investment in IT infrastructure and specialised expertise would be necessary to support these efforts.

— The duration of investigations remains an important indicator of the effectiveness of OLAF's action. In 2025, the Committee continued its close monitoring of investigation timelines, with a particular focus on cases lasting more than 36 months. The Committee examined whether breaks in investigative activity were justified, whether lengthy investigations were given sufficient priority to move them towards completion, and whether the overall duration of each case remained proportionate to its complexity. Further details on the Committee's findings are provided in this report.

— Another important aspect of the Committee's work in 2025 was an in-depth assessment of the implementation of the recommendations issued to OLAF through the Committee's opinions between 2021 and 2024. The Committee found that 58 % of its recommendations had been successfully implemented, 17 % were partially implemented, and 15 % were no longer applicable due to changed circumstances. In the remaining 10 % of cases, the Committee considered that further steps from OLAF were still required.

— The outstanding issues mainly relate to strengthening OLAF's capacity to manage the duration of investigations effectively, clarifying the scope of investigations, and further developing cooperation between OLAF and the EPPO. At the same time, the Committee acknowledges that important developments are expected in the context of the ongoing review of the EU anti-fraud architecture. Further details on the Committee's findings are provided in this report.

For part of 2025, the Committee operated with a reduced composition following the resignation of Ms Anjinho in February 2025 and the earlier resignation of Mr Cretin in July 2024. Despite this temporary reduction in membership, the Committee continued to carry out its responsibilities. Its full composition of five members was restored with the appointment of Ms Stylianidi in May 2025 and Mr Chendi in October 2025.

As a final remark, on behalf of the members of the Committee, I would like to thank the Director-General of OLAF for his open and constructive approach in the Committee's exchanges with OLAF. The Committee also wishes to express its appreciation to the acting Director-General for her cooperation following the departure of the former Director-General. Lastly, I would like to acknowledge the valuable support provided by the Secretariat, under the leadership of its acting Head, whose professionalism and dedication greatly contributed to the Committee's work. The Committee also appreciates the constructive cooperation of its institutional partners across the EU anti-fraud architecture, since effective protection of the EU's financial interests ultimately depends on the collective strength of the whole system.

Marita SALGRĀVE
Chair of the Supervisory Committee

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1. **About the Committee**

1. The Supervisory Committee of the European Anti-Fraud Office (OLAF) ('the Committee') is an independent body established by Regulation (EU, Euratom) 883/2013 ([1]) (the 'OLAF Regulation') to reinforce and guarantee OLAF's independence by regularly monitoring the implementation of OLAF's investigative function.

2. The Committee is composed of five independent external experts ('the members'), appointed by common agreement of the European Parliament, the Council and the European Commission for five years ([2]). The members perform their role in complete independence and may neither seek nor take instructions from any government or EU institution, body, office or agency. The Committee members serve in a non-permanent capacity, supported in their work by a Secretariat provided by the Commission. The Secretariat works on a permanent basis under the Committee's direct authority, independently of the Commission, OLAF or any other body. The Secretariat plays a key role in facilitating and contributing to the Committee's monitoring tasks.

3. Given the nature of OLAF investigations, no recourse to EU Courts is possible against a decision to open or close an investigation made by the Director-General of OLAF ([3]). This means that, together with the Controller of procedural guarantees (who handles complaints against OLAF for non-compliance with procedural guarantees and the rules applicable to investigations) ([4]), the Committee plays a crucial role as an independent body entrusted with the supervision and scrutiny of how OLAF conducts its investigations. This places the Committee in a privileged position, as it provides the EU institutions with an insight into OLAF's functioning and provides an assurance that OLAF is acting legally and in compliance with the applicable procedural guarantees.

4. Under the OLAF Regulation, the Committee is entrusted with a threefold role: (i) regular monitoring of OLAF's investigatory function; (ii) assisting OLAF's Director-General in discharging their responsibilities; and (iii) reporting to the EU institutions.

5. In particular, by regularly monitoring OLAF's investigations, the Committee seeks to ensure that:

   (i) there is no external interference in OLAF's investigative function;

   (ii) all relevant decisions of the Director-General are adopted according to the principles of legality and impartiality and comply with the Charter of Fundamental Rights of the European Union ([5]) and the procedural guarantees as enshrined in the OLAF Regulation.

6. The Committee's work includes addressing **opinions** to the Director-General of OLAF and, where appropriate, **recommendations** on OLAF's investigative work, the duration of its investigations and the resources needed by OLAF to carry out those investigations. The Committee also formulates **observations** ([6]) on OLAF's draft Guidelines on Investigation Procedures ('GIPs') ([7]). When issuing its opinions and recommendations, the Committee never interferes with the conduct of ongoing OLAF investigations.

([1]) Article 15(2) of Regulation (EU) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999 (OJ L 248, 18.9.2013, p. 1) as amended by Regulation (EU, EURATOM) 2016/2030 and Regulation (EU, EURATOM) 2020/2223. Consolidated version available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02013R0883-20210117.

([2]) To preserve the experience built up in the Committee, the members are replaced on an alternating basis, in accordance with the OLAF Regulation.

([3]) Order of the General Court of 12 November 2018, *Stichting Against Child Trafficking v Commission*, T-658/17, ECLI:EU:T:2018:799.

([4]) See Article 9a(8) of the OLAF Regulation.

([5]) Charter of Fundamental Rights of the European Union, OJ C 326, 26.10.2012, pp. 391–407, available at: https://www.europarl.europa.eu/charter/pdf/text_en.pdf.

([6]) See Article 17(8) of the OLAF Regulation.

([7]) Guidelines on Investigation Procedures for OLAF Staff, in force as of 1 January 2026, available at: https://anti-fraud.ec.europa.eu/document/download/e1994c22-7d58-4e61-8d34-0937a0be8f98_en?filename=gips-2026_en.pdf.

2. **Monitoring activities**

7. During the reporting year, the Committee addressed two opinions to the Director-General of OLAF, under Article 15 of the OLAF Regulation, namely, Opinion 1/2025 ([8]), published on 6 February 2025, and Opinion 2/2025 ([9]), published on 2 June 2025 ([10]). These set out a number of recommendations. The Committee continued to monitor the duration of OLAF's investigations and the application of procedural guarantees. In the reporting period, the Committee also undertook a comprehensive assessment of the level of implementation by OLAF of its already issued recommendations.

8. In addition to the above-mentioned monitoring exercises and opinions published in 2025, during the reporting year, the Committee approved a draft opinion, which was published on 21 January 2026 (Opinion 1/2026) ([11]). The Committee also worked on a further opinion scheduled for adoption and publication in the first half of 2026.

2.1. ***Opinion 1/2025 on OLAF's internal investigations of harassment within the EU institutions, bodies, offices and agencies (IBOAs)***

9. In 2022, the Director-General of OLAF informed the Supervisory Committee of certain difficulties OLAF was encountering in a number of cases relating to internal investigations into harassment, which could jeopardise his independence.

10. Following the information received, the Committee decided to issue an opinion clarifying OLAF's role and powers in investigating inappropriate behaviour and harassment within IBOAs. In this context, the Committee examined the added value that such investigations brought to the fight against harassment and similar misconduct by EU officials and IBOA members. The analysis concerned a sample of 29 OLAF cases (9 closed investigations and 20 dismissed cases) conducted in 2018-2023.

11. In December 2024, the Committee approved its draft Opinion, which was formally adopted and published in January 2025. In the 2024 annual report the Committee provided an in-depth analysis of the main contents of the Opinion. The main findings are further summarised below.

12. The Committee observed that, following the *Dalli* judgement ([12]), it has been established that OLAF is competent to conduct internal investigations into serious matters relating to the discharge of professional duties by staff and members of IBOAs, regardless of financial impact, based on Article 1(4) of the OLAF Regulation.

13. The review of cases indicated that OLAF typically does not pursue facts involving officials or middle management if the IBOA can conduct an effective inquiry itself, opting instead to pass the matter on to them under Article 5(6). However, OLAF does investigate allegations against senior staff or IBOA members to ensure independence. The Committee found OLAF's handling of harassment complaints aligns with its mandate, offering added impartiality for cases involving senior officials. Internal IBOA investigations may lack objectivity or resources and can pose reputational risks.

([8]) SC Opinion 1/2025, *OLAF's internal investigations of harassment within the EU institutions, bodies, offices and agencies (IBOAs).*

([9]) SC Opinion 2/2025, *OLAF's preliminary draft budget for 2026*.

([10]) All adopted Opinions and Annual Reports referred to in the present document are available on the Supervisory Committee webpage: Opinions and reports - Supervisory Committee of OLAF - European Union.

([11]) SC Opinion 1/2026 *accompanying the Commission Evaluation Report on the application and impact of the OLAF Regulation*.

([12]) Judgement of 6 June 2019, *Dalli v Commission*, T-399/17, ECLI:EU:T:2019:384, upheld by judgement of 25 February 2021, *Dalli v Commission*, C-615/19P, ECLI:EU:C:2021:133. In this landmark judgement, the Court explicitly examined the question of OLAF's power to carry out internal investigations that do not affect the EU's financial interests. In paragraph 62 of the judgement the Court concludes that 'the absence of an impact on the financial interests of the Union does not affect the possibility for OLAF to open an investigation.'.

14. While most IBOAs cooperated with OLAF, two cases saw resistance that delayed investigations. The Committee emphasised that, once OLAF opens an investigation, IBOAs must cooperate fully and avoid parallel inquiries, as failure to do so breaches the applicable legal framework and undermines OLAF's independence.

2.2. *Opinion 2/2025 on OLAF's preliminary draft budget for 2026*

15. Every year, the Committee adopts an opinion on OLAF's preliminary draft budget to provide assurance to the EU institutions that the draft budget preserves the independence of OLAF's investigative function. More specifically, the Committee's opinion examines whether OLAF has sufficient financial and human resources to step up the fight against fraud, corruption and any other illegal activity, and to carry out effectively the tasks assigned to it.

16. On 2 June 2025, the Committee issued Opinion 2/2025 on OLAF's preliminary draft budget for 2026. In this Opinion, it was noted that OLAF's preliminary budget had increased by 3,8 % compared with the 2025 budget. The proposed increases in certain budget lines were duly justified and compliant with the Commission's guidelines for drawing up the OLAF draft budget for 2026.

17. Staff expenditure was the main cost factor weighing over 72 % of the total budget. The Committee noted that OLAF's establishment plan for 2026 had been reduced by 6 posts compared with the previous year, resulting in 310 posts. This reduction was the result of the linear contribution model imposed on all Commission departments, to allow for future redeployment of establishment posts to priority areas. In light of this latest reduction of its establishment plan, and the fact that OLAF had had to release a total of 47 posts since 2018, the Committee stressed that any further reduction in OLAF's human resources should be subject to careful evaluation.

18. Addressing OLAF's budget line for 'missions and representation costs', the Committee noted that this would remain at the same level as in 2025, thus largely preserving OLAF's vital capacity to conduct on-the-spot inspections in and outside the EU as part of its investigations.

19. OLAF's budget for 'information and communication technology', had been increased by EUR 100 000, resulting in a 1,76 % increase compared with the 2025 level. The Committee noted that the increase would mainly cover costs linked to reorganisation processes.

20. The Committee pointed out that an important feature of OLAF's budget was its interconnected structure, which allowed it to make 'internal' budgetary transfers among its different budgetary lines without requesting permission from the EU budgetary authority. This possibility had enabled OLAF to respond to unforeseen events and challenges in the past, and to manage its budget with a higher degree of flexibility than any other Commission's Directorates-General. The Committee had always been in favour of OLAF's autonomy in budget management, as an additional (budgetary) guarantee of its independence.

21. That said, the Committee stressed the importance of OLAF always managing its budget in a manner that, as far as possible, respected the general budgetary principles set out in Articles 6 to 38 of the Regulation on the financial rules and applicable to the general budget of the EU ([13]), including the principles of transparency and specification.

22. The Committee concluded that OLAF's PDB for 2026 was in line with the Commission's budgetary proposals for establishing the Commission's draft budget for 2026. However, it also underlined the importance of ensuring that OLAF retained sufficient staffing levels to fulfil its mandate and that human resources were aligned with OLAF's operational needs. Lastly, it drew attention to the fact that the development and deployment of artificial intelligence tools, essential for the future of fraud detection and prevention, would require additional investment in IT infrastructure and expertise.

([13]) Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (OJ L, 2024/2509, 26.9.2024,ELI: http://data.europa.eu/eli/reg/2024/2509/oj).

2.3. ***Draft Opinion accompanying the Commission Evaluation Report on the OLAF Regulation***

23. Article 19(1) of the OLAF Regulation entrusts the Commission with the task of carrying out a complete evaluation on the 'application and impact' of the OLAF Regulation, 'in particular as regards the effectiveness and efficiency of the cooperation between the Office [OLAF] and the EPPO'. Article 19(1) also requires the Committee to submit a separate, independent opinion to be attached to the Commission's evaluation report.

24. In April 2024, the Director-General of OLAF informed the Committee that OLAF, in its capacity as the Commission department responsible for the development of anti-fraud policy, had started the process of evaluating the OLAF Regulation. In this context, the Committee was asked to provide its opinion.

25. The Committee approved its draft Opinion in December 2025 and formally adopted it in January 2026 ([14]).

26. In its Opinion, the Committee undertook a comprehensive and independent assessment of the application and impact of the OLAF Regulation, based on its unique monitoring experience. On the one hand, the Committee drew on formal opinions, evidence-based findings and recommendations it had previously formulated. On the other hand, it stated views and suggestions not yet formally presented to OLAF, based on direct evidence or secondary information provided by OLAF.

27. First, the Committee analysed and assessed the key amendments made to the OLAF Regulation by (i) Regulation 2016/2030, which enhanced the independence and functioning of the Supervisory Committee by entrusting its Secretariat to the Commission ([15]); and (ii) Regulation 2020/2223 ([16]), which aligned OLAF's operations with the EPPO's and introduced important procedural and operational improvements. Then the Committee looked at the OLAF Regulation in its entirety and made observations not only on the provisions introduced through the 2016 and 2020 amendments, but also aspects of the Regulation that were left untouched by these amendments. Lastly, whenever the Committee identified weaknesses and shortcomings in the current amended OLAF Regulation, it put forward concrete proposals aimed at strengthening and clarifying the relevant provisions.

28. The analysis prompted the Committee to make suggestions on several provisions, in view of their possible revision following the evaluation exercise. These suggestions were organised into four thematic areas. First, the boundaries of OLAF investigations were considered, covering issues typically emerging in the initial phase of investigations ([17]). Second, some important aspects characterising the conduct of OLAF investigations were dealt with, spanning from procedural guarantees to OLAF-EPPO cooperation ([18]). Third, observations and suggestions regarding the value of OLAF's report and their follow-up were presented ([19]). Fourth, remarks and suggestions were made on the functioning of the Supervisory Committee ([20]).

29. On the issue of **the boundaries of OLAF investigations**, the Committee reiterated the timeliness of clarifying the scope of OLAF's mandate, reflecting the landmark *Dalli* ruling. According to the Committee, under the current legal framework, as interpreted by the relevant case law, OLAF is empowered to investigate not only matters related to the protection of the EU's financial interests (PIF) but also matters that go beyond PIF ([21]). Moreover, the Opinion placed

([14]) SC Opinion 1/2026 *accompanying the Commission Evaluation Report on the application and impact of the OLAF Regulation*.
([15]) Regulation (EU, Euratom) 2016/2030 of the European Parliament and of the Council of 26 October 2016 amending Regulation (EU, Euratom) No 883/2013, as regards the secretariat of the Supervisory Committee of the European Anti-Fraud Office (OLAF), (OJ L 317, 23.11.2016, p. 1, ELI: http://data.europa.eu/eli/reg/2016/2030/oj).
([16]) Regulation (EU, Euratom) 2020/2223 of the European Parliament and of the Council of 23 December 2020 amending Regulation (EU, Euratom) No 883/2013, as regards cooperation with the European Public Prosecutor's Office and the effectiveness of the European Anti-Fraud Office investigations (OJ L 437, 28.12.2020, p. 49, ELI: http://data.europa.eu/eli/reg/2020/2223/oj).
([17]) SC Opinion 1/2026, Chapter 3.1.
([18]) SC Opinion 1/2026, Chapter 3.2.
([19]) SC Opinion 1/2026, Chapter 3.3.
([20]) SC Opinion 1/2026, Chapter 3.4.
([21]) The Committee had already expressed this view in its Opinion 4/2024 and Opinion 1/2025.

special emphasis on the possibility of further extending OLAF's mandate to additional areas, reflecting the growing recognition of its specialised expertise and its added value in tackling sophisticated, multijurisdictional cases. To accommodate this, the Committee noted that consideration could be given to reintroducing into the Regulation a structured system for prioritising OLAF's investigations. The Committee also stressed the importance of preserving OLAF's operational independence, especially with regard to a clearly defined delegation procedure of OLAF's Director-General powers. The Committee further underlined the importance of the Regulation providing clear definitions of concepts like 'sufficient suspicion' and of introducing a definition of 'scope of the investigation' in Article 5 of the amended OLAF Regulation ('*Opening of investigations*').

30. On the multifaceted question of **the conduct of OLAF investigations**, the Committee made several remarks. Among other things, the Committee suggested that the OLAF Regulation made explicit reference to the fact that investigations should be concluded 'within a reasonable time' and that for cases longer than 24 months a formal decision by the Director-General OLAF on the way forward should be taken. The Committee also suggested reconsidering the provision that the opinion of the Review Team on closing the investigation 'shall be annexed to the final investigation report', to ensure that it remained an internal document, whose conclusions were communicated only to external recipients, where appropriate. On OLAF-EPPO cooperation, the Committee considered that more guidance on the concept of 'manifestly unsubstantiated allegations' in Article 12c(3) would provide more clarity, to the benefit of more consistent collaboration between the two bodies. On procedural guarantees, the Committee made suggestions aimed at eliminating unnecessary differential treatment between persons concerned in internal and external investigations and at ensuring the *effet utile* of the procedural guarantees already enshrined in the OLAF Regulation.

31. The Committee also tackled the key and long-debated question of **the value of and follow-up to OLAF recommendations**. In this regard, the Committee recognised that, while altering the general legal value of OLAF's output would entail complex reflections, a stronger OLAF involvement in the recovery of funds could be envisaged with specific regard to financial recommendations. The Committee also suggested strengthening the mechanisms currently enshrined in Article 11 of the OLAF Regulation, to align the legal basis with existing monitoring and reporting practices. With a view to further improving the follow-up rate, the Committee also suggested extending the role of anti-fraud coordination services ('AFCOS') to encompass the follow-up to OLAF recommendations.

32. Finally, the Opinion included some suggestions on **the Supervisory Committee's own functioning**. In this regard, the Committee proposed some clarifications in Article 15 of the OLAF Regulation to protect its independent and impartial functioning, by suggesting that the Regulation itself provide for direct electronic access to the relevant parts of the OLAF case management system ('OCM'). The Committee also suggested minor legislative changes to ensure the necessary complementarity between the Controller of procedural guarantees and the Supervisory Committee in assessing OLAF's compliance with procedural guarantees.

2.4. *Monitoring OLAF's duty to report criminal conduct to the EPPO*

33. Under the current legal framework, OLAF and the EPPO have complementary roles in protecting the EU's financial interests. In particular, the amended OLAF Regulation provides that both the EPPO and OLAF should establish and maintain a close cooperation aimed at ensuring the complementarity of their respective mandates and, where relevant, coordination of their actions. According to the amended OLAF Regulation, 'the relationship between OLAF and the EPPO should be such as to contribute to ensuring that all means are used to protect the financial interests of the Union' ([22]).

34. The Committee has consistently expressed a strong interest in understanding how the new legal framework introduced by the EPPO Regulation and the amended OLAF Regulation has influenced OLAF's investigative activities and, more generally, how OLAF's cooperation with the EPPO has been achieved in practice. The Committee considers the proper implementation of the cooperation mechanisms between the two bodies to be an important component of OLAF's operational independence and good functioning. In this context, the Committee sees the monitoring of their cooperation as an essential part of its mandate and work programme.

([22]) Recital 4 of Regulation 2020/2223.

35. Reflecting this priority, in February 2024, the Committee issued its first dedicated opinion on complementary investigations carried out by OLAF ([23]). In its conclusions, the Committee commended both the EPPO and OLAF for their constructive engagement in making this mechanism operational. Given the evolving nature of complementary investigations, the Committee continued to monitor the complementary investigations conducted by OLAF throughout 2024 and how its recommendations had been implemented ([24]).

36. In 2025, the Committee focused its attention on another critical aspect of the cooperation framework, namely OLAF's duty to report suspected criminal conduct to the EPPO. This obligation, like OLAF's duty to discontinue or complement investigations in cases falling under the EPPO's competence, has a direct impact on OLAF's investigative functions. By monitoring the implementation of this reporting duty, the Committee aims to reinforce OLAF's investigative independence. The analysis has focused on verifying: (i) the way OLAF collects, handles and analyses all relevant information before deciding whether to report a case to the EPPO; (ii) that no external interference affects the conduct of OLAF's investigatory functions; (iii) that OLAF's decisions are taken impartially and without undue delay; and (iv) that OLAF's actions are fully in line with the applicable legal framework.

37. In this context and in line with Article 15(1), last indent, of the OLAF Regulation and Articles 12 and 13 of the working arrangements between OLAF and the Supervisory Committee ([25]), the Committee had access to the relevant case files of (i) a sample of 25 cases dismissed due to EPPO competence; (ii) 9 closed cases initially referred to the EPPO but not taken over by the EPPO; and (iii) 14 cases discontinued due to EPPO competence. The Committee also selected and analysed: (iv) a sample of 20 closed investigations not reported to the EPPO on the basis of the following criteria: a) cases in which information related to the case was subsequently requested by the EPPO following the closure of OLAF's investigation; b) cases which concerned matters related to the Recovery and Resilience Facility ('RRF'); and c) cases ensuring an adequate representation of all investigative units, so that at least two cases of each of OLAF's investigative units fell within the scope of the assessment.

38. The Committee's analysis is currently ongoing. The findings of this work, together with any resulting recommendations, will be set out in a dedicated opinion, which the Committee intends to adopt in the first half of 2026.

2.5. *Monitoring the duration of OLAF's investigations*

39. Article 7(8) and Article 15(1) of the OLAF Regulation form the legal basis for the Committee to carry out an analysis of inquiries longer than 12 months, to ensure that OLAF investigations are conducted continuously and over a period proportionate to their circumstances and complexity.

40. By regularly monitoring the duration of OLAF's investigations and the reasons for any undue delay, the Committee seeks to verify that no external or internal interference in the impartial conduct of an investigation has occurred. An investigation that is lengthy without justification may have serious negative consequences for: (i) the procedural rights of the person(s) concerned; and/or (ii) the follow-up to the investigation. By monitoring the length of investigations, the Committee also checks that the human and financial resources allocated to OLAF have been used efficiently.

([23]) Opinion 1/2024, *Complementary Investigations of OLAF and the EPPO*.
([24]) See SC Annual Activity Report of 2024, Section 2.1.
([25]) Pursuant to the working arrangements between OLAF and the SC, signed on 21 October 2021, OLAF gives the Committee direct access rights to parts of its case management system ('OCM') to enable the Supervisory Committee to perform its monitoring activity under Regulation 883/2013. Article 12 and 13 of the working arrangements sets out the principles of that access.

41. The Committee considers the duration of investigations to be an important indicator of the effectiveness of OLAF's action and, over the years, it has paid particular attention to this subject. In its previous Opinion ([26]) the Committee identified certain shortcomings that prompted a number of recommendations to the Director-General of OLAF.

42. In its Opinion 3/2024 on the draft new Guidelines on Investigative Procedures ([27]), the Committee welcomed the progress made by OLAF in managing the duration of its investigations. The Committee also stressed the importance of the GIPs providing clear guidance to investigators on avoiding unjustified periods of inactivity during the investigation process and on overcoming the issue of disproportionately lengthy investigations. The Committee observes that OLAF took note of such remarks and partially implemented the Committee's recommendations in the final version of the GIPs, which entered into force on 1 January 2026 ([28]).

43. In particular, the GIPs have either implemented or implemented to the extent possible many of the Committee's recommendations on the duration of OLAF investigations ([29]), the decision-making process in investigations ([30]), the definition and changes in the scope of investigations ([31]), the selection phase ([32]), the rights of persons concerned ([33]), the terminology on the recording of telephone conversations ([34]), the classification of investigations ([35]), and the internal advisory and control procedures ([36]). The Committee also welcomes the new provision of the GIPs on work plans, which must be drawn up at the start of an investigation and updated whenever required, and include references to solutions and measures to overcome problems ([37]).

44. During the reporting period, as every year, the Committee received information from OLAF on investigations lasting more than 12 months. To better understand how OLAF managed the duration of its investigations and how it complied with the general principle of proportionality, also in light of previously formulated recommendations, the Committee carried out an assessment focusing on investigations lasting more than 36 months (see Section 2.5.2).

2.5.1. *Reports of investigations lasting over 12 months received by the Committee in 2025*

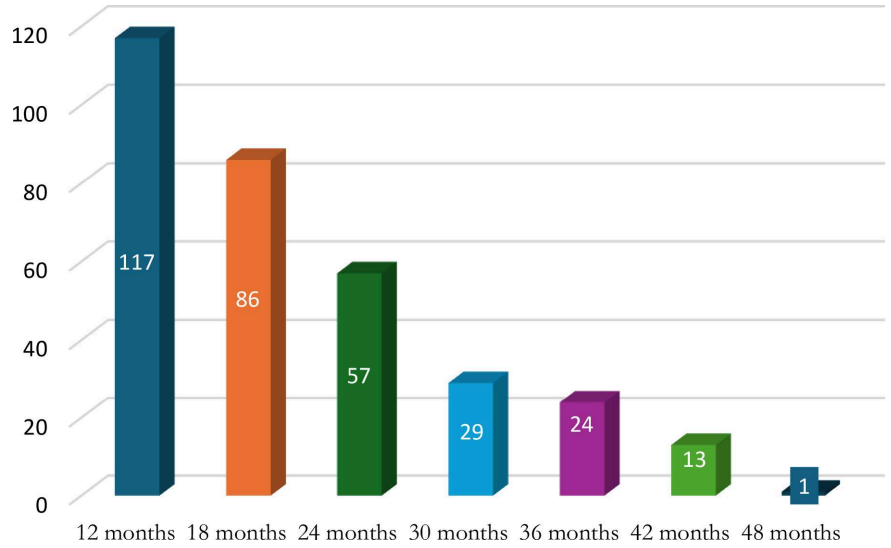
45. If an investigation cannot be closed within 12 months of being opened, Article 7(8) of the OLAF Regulation ([38]) requires the Director-General of OLAF to formally report to the Committee 12 months after the investigation has been opened and every six months thereafter. In these reports, the Director-General of OLAF sets out the reasons for the investigation remaining open and, where appropriate ([39]), the remedial measures to be taken to speed up the investigation, as well as the expected timeframe for completion.

([26]) SC Opinion 5/2021, *Analysis of OLAF's investigations lasting more than 36 months in 2019*.
([27]) SC Opinion 3/2024, *OLAF's Guidelines on investigation procedures*.
([28]) For more details see below Section 2.6 '*Monitoring OLAF's implementation of SC recommendations*'.
([29]) SC Opinion 3/2024, recommendations I.1(vii) and (viii).
([30]) SC Opinion 3/2024, recommendations I.2(i), (ii), (iii), (vii) and (viii).
([31]) SC Opinion 3/2024, recommendations I.3(i) and (iv).
([32]) SC Opinion 3/2024, recommendations I.4(i) and (vi).
([33]) SC Opinion 3/2024, recommendations I.5(iii) and (iv).
([34]) SC Opinion 3/2024, recommendation I.6.
([35]) SC Opinion 3/2024, recommendations I.7(i) and (ii).
([36]) SC Opinion 3/2024, recommendations I.8(i) and (ii).
([37]) SC Opinion 3/2024, recommendations I.1(vi) and I.9.
([38]) Article 7(8) Regulation 883/2013 states: 'If an investigation cannot be closed within 12 months after it has been opened, the Director-General shall, at the expiry of the 12-month period and every six months thereafter, report to the Supervisory Committee, indicating the reasons and the remedial measures envisaged with a view to speeding up the investigation'.
([39]) The wording 'where appropriate' was added to the text of Article 7(8) of the OLAF Regulation by Regulation 2020/2223.

46. In 2025, the Committee received 484 reports from OLAF about 327 ongoing individual investigations lasting over 12 months. Of those, 49 % exceeded 24 months and 16 % exceeded 36 months (Figure 1).

Figure 1

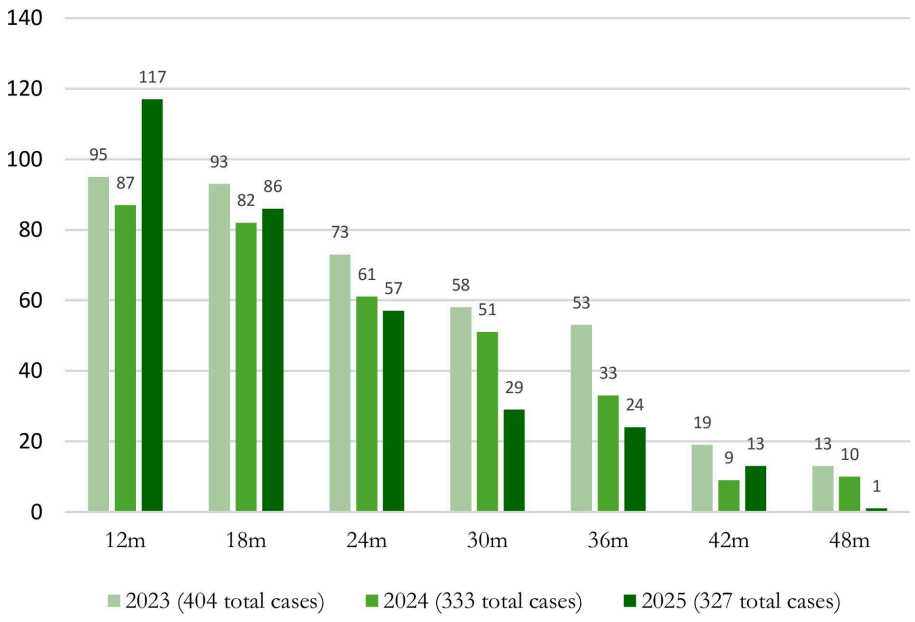
327 lengthy individual cases reported in 2025



47. To place these figures in context, Figure 2 provides a comparative overview of the number of individual investigations lasting more than 12 months over the past three years. It shows a gradual decrease in the overall number of long-lasting cases reported by the Director-General of OLAF, from 404 cases in 2023 to 333 in 2024, and 327 in 2025. This trend suggests a reduction in the average duration of lengthy investigations, indicating some improvement in the timeliness with which these cases are handled by OLAF. This is illustrated, for instance, by the figures relating to investigations lasting longer than 48 months. In 2023 there were 13 such investigations and in 2024 there were 10. During the 2025 monitoring exercise the Committee identified only one such instance.

Figure 2

Evolution of lengthy individual cases reported between 2023 and 2025



2.5.2. *OLAF investigations lasting more than 36 months in 2025*

48. In 2025, the Committee carried out regular monitoring of the duration of OLAF investigations, specifically focusing on those exceeding 36 months. The monitoring took place in three phases over the year. First, the Committee analysed cases that had exceeded 36 months between 1 January and 30 June 2025 (19 cases). Then, the Committee reviewed new cases that exceeded 36 months between 1 July and 30 September 2025 (7 new cases). Lastly, between 1 October 2025 and 31 December 2025, the Committee reviewed the final batch of cases exceeding 36 months (7 new cases). In this last phase, the Committee also examined progress on all 33 cases, including the updates of the 26 cases analysed in the first and second phases earlier in the year. In all three phases the Committee analysed only those reported cases that were still ongoing ([40]).

49. In line with Article 10 of the working arrangements between OLAF and the Committee, the Committee accessed the case files of the above-mentioned 33 investigations. By the end of December 2025, OLAF had closed 22 of these cases ([41]), while 11 remained ongoing ([42]).

50. The Committee also sent requests for information to obtain a comprehensive overview of each case analysed. The Committee duly considered the comments provided by OLAF in reaching its final conclusions.

51. The Committee's review looked at the indicators set out below.

Continuity of investigative activities. The continuity of investigative activities was carefully reviewed throughout the duration of each case. The Committee verified the reasons provided by OLAF in its 12-month reports against the case files and analysed the continuity of activities between the reporting periods. As per established practice, the Committee also paid particular attention to breaks in investigative activities, considering breaks exceeding three months as 'red flags', while those exceeding six months as indicative of serious obstacles encountered by the case team that have, or could have, a substantial impact on the overall duration of an investigation. Justifications were looked for in the case file (either explicitly stated or otherwise inferable) ([43]). The Committee also focused on the OLAF Review Team's assessment of the continuity of investigations ([44]).

Investigation planning and operational prioritisation. The Committee reviewed OLAF's internal practice for managing the duration of investigations, with particular emphasis on planning and operational prioritisation. The Committee assessed whether a consistent and uniform approach was adopted across all OLAF units ([45]). The Committee also considered whether investigations exceeding 36 months were given operational priority by OLAF's management, to expedite their completion ([46]).

Proportionality and effectiveness. The Committee also conducted a preliminary assessment of the proportionality of the duration of each investigation, evaluating whether it was justified based on the circumstances of the case. Furthermore, the Committee assessed whether the remedial measures proposed were meaningful and apt in addressing the reasons for non-completion.

52. The analysis carried out by the Committee in 2025 is summarised below.

([40]) The total reported investigations lasting more than 36 months amounted to 38 cases. Cases that were reported to the Committee but closed before the analysis took place were not taken into consideration and amounted to 5.
([41]) [Confidential].
([42]) [Confidential].
([43]) SC Opinion 5/2021, recommendation 1b.
([44]) SC Opinion 5/2021, recommendation 2. Throughout the course of an OLAF investigation, an internal advisory and control system provided in Article 17(7) of the amended OLAF Regulation ensures (i) compliance of the activities undertaken by OLAF during its investigation with the principles of legality, necessity and proportionality; (ii) the respect of procedural guarantees and fundamental rights; and (iii) the correct application of EU and national law. This independent internal legality and control mechanism is currently assigned to a team of legal experts within OLAF (the Review Team).
([45]) SC Opinion 5/2021, recommendation 3.
([46]) SC Opinion 5/2021, recommendation 4c.

Reporting

53. The Committee noted that 'the complexity of the matter' was the most frequently invoked reason by OLAF to justify the duration of an investigation (in 70 % of the cases). The circumstances in which an investigation could be considered complex can vary from case to case, depending on the subject matter and the specific circumstances. Complexity is typically mentioned by OLAF when documents are numerous and difficult to examine due to their format, volume and language. Complexity is also mentioned when inter-jurisdictional difficulties and novel legal issues arise, when the case involves or could potentially involve many persons ([47]) and/or countries, when the scope of the investigation is broad, or when transactions are difficult to analyse.

54. Other reasons reported by OLAF to justify duration are internal (e.g. human resources issues such as a long absence of a lead investigator or the reorganisation of an investigative team), or external circumstances beyond OLAF's control (e.g. difficulties cooperating with stakeholders, waiting for input from EU institutions, national authorities or other stakeholders, or the impact of the COVID-19 pandemic ([48])).

55. An increasing number of complementary investigations between OLAF and the EPPO was another reason impacting the duration of investigations. One third of the observed cases ([49]) were either complementary investigations or cases where potential EPPO competence was detected, with all of them being suspended while awaiting replies from the EPPO. Investigative activities were suspended mainly because of either (i) the need to wait for the EPPO's decision to initiate their own criminal investigation based on the EPPO crime report drafted by OLAF; or (ii) in the cases where an EPPO investigation was opened and OLAF deemed it appropriate, the need to wait for the EPPO to agree to OLAF conducting a complementary investigation.

56. The Committee assessed the content of OLAF's 12-month reports against all the data available in each case file without finding any discrepancies. In general terms, the Committee considers that the template used for reporting to the Committee, if filled in correctly, can provide a reliable overview of the case. It is important to update the information therein every six months, with particular attention paid to remedial measures taken during the reporting period and their effectiveness. The Committee has already pointed out ([50]) that an investigation in the process of completion when the 12-month report is drafted does not relieve OLAF of its duty to inform the Committee of the remedial measures taken during the investigation.

Continuity of investigations

a. *Breaks in investigative activities*

57. The Committee carefully examined the intensity of investigative activities throughout the duration of each case and identified periods of inactivity in the lifecycle of the majority of the cases analysed (27 cases) ([51]). In most instances, a case had more than one period of inactivity. In 27 cases, the Committee found breaks lasting 3-8 months ([52]). In 6 cases, the breaks lasted 9-15 months ([53]). In comparison with the 2024 exercise, the Committee did not find longer periods of inactivity (4 cases in the 2024 exercise had breaks of more than 16 months).

58. The Committee, as consistently stated, acknowledges that the analysis of duration cannot be based solely on the number and length of the activity breaks in an investigation, and that any analysis must take account of the whole investigation case file and, in line with Article 7(5) of the OLAF Regulation, the specific circumstances and complexity of each case.

([47]) The cases analysed featured a range of natural/legal persons, spanning from 1 to 29.
([48]) This justification applies to cases opened during the year 2021 or in the first quarter of 2022.
([49]) [Confidential].
([50]) See SC Opinion 5/2021, paras. 38 and 39.
([51]) For purposes of brevity, no periods of inactivity were identified in five cases [confidential].
([52]) [Confidential].
([53]) [Confidential].

59. The Committee reiterates ([54]) that periods of inactivity must be properly recorded and justified in the case file, and that obstacles or delays encountered by the case team during the lifecycle of an investigation should always be registered and traceable in the OCM, e.g. in the form of a note to the file. This would enable OLAF's management to effectively monitor progress in an investigation and ensure the required degree of transparency and accountability.

60. In its previous analysis of duration, the Committee noted that, in some cases, OLAF had not properly recorded the circumstances behind periods of inactivity in the OCM ([55]). The analysis carried out in 2024 ([56]) had already shown some improvement in this field compared with the past. In 2025, the Committee observed a similar trend, as on occasion OLAF documented breaks of over three months, so the Committee could analyse the reasons behind such periods of inactivity. In only two cases did the Committee detect undocumented breaks for which OLAF could not provide sufficient explanation ([57]).

61. In this regard, the Committee commends the practice of documenting the incremental progress of OLAF's data analysis in case-file notes, as well as the recording of any procedural obstacle encountered by the investigation team. In comparison with the 2024 exercise, the Committee observes an improving tendency, even though practice varies from case to case.

62. The Committee would also like to encourage the investigative units to leave a record in the OCM of those investigative activities that take place in person and/or orally, such as meetings, phone conversations or videoconferences (e.g., via a note to the file), accounting for the purpose and main outcome of the investigative activity.

63. In addition, the Committee noted that, while in most cases OLAF registered documents on time, on a few occasions this was done with some delay (e.g., email exchanges dating back some time before they were entered in the OCM). This practice deviates from the need for clarity and transparency in the OCM, which is in turn instrumental for the streamlined conduct of investigations, managerial supervision and the Committee's monitoring work. The Committee, therefore, stresses the importance of entering all relevant documents in the OCM without delay and, if impossible to do so, providing and registering an explanation in the file (email exchange, note to the file, etc.).

b. *Opinions of the Review Team*

64. In all 22 closed cases, the Committee also analysed the opinions issued by the Review Team before the closure of a case ('opinion on closing'). The Committee found a degree of heterogeneity in the analysis carried out by the Review Team on the continuity of investigations. In some cases, the Review Team's opinion referred to periods of inactivity or the complexity of the case without providing explanations or additional details to support their assessment. In other cases, the opinion simply stated that 'no such indications [of undue delays]' were found, although the case-file content may suggest otherwise.

65. The Committee echoes its previously expressed view ([58]) that the assessment carried out at the end of the investigation is extremely relevant to monitor the efficiency of OLAF's activity. Therefore, in order for the opinions on case closure to remain meaningful and to fulfil their purpose ([59]), the Committee reiterates that they should include a substantiated and complete assessment of the continuity of the investigation, including duration-related considerations.

([54]) SC Opinion 5/2021, para. 44.
([55]) SC Opinion 5/2021, paras. 45 and 46.
([56]) Supervisory Committee Annual Report 2024, para. 90.
([57]) [Confidential].
([58]) SC Opinion 5/2021, recommendation 2; and Supervisory Committee Annual Report 2024, para. 94.
([59]) Article 17 of the OLAF Regulation.

66. The Committee encourages OLAF to strike an appropriate balance between safeguarding confidentiality and ensuring an effective legality check. To support OLAF in addressing this issue, the Committee recently suggested legislative amendments that would ensure that the Review Team opinion on closure was treated as an internal document so that, where appropriate, only its conclusions were communicated to external recipients ([60]). This would improve the Review Team's ability to fulfil its role as an independent safeguard, providing the Director-General of OLAF with a reliable and meaningful appraisal of the lawfulness, proportionality and procedural integrity of the investigative activities. Nonetheless, pending any amendment to the OLAF Regulation, the Committee trusts that OLAF will follow up on this matter to ensure that the Review Team's work remains meaningful.

Investigation planning and prioritisation

67. As provided for by the recent amendment of the GIPs, investigative units are required to 'prepare a work plan for the investigation as soon as possible after its opening' ([61]), and they 'shall be updated regularly' ([62]). Furthermore, the GIPs now expressly require that OLAF's senior manager 'monitor the implementation of work plans' ([63]). The Committee welcomes this development and recognises the efforts of the Director-General of OLAF in implementing recommendation 3 of Opinion 5/2021.

68. The analysis carried out revealed that, in 2025, in 30 % of cases, initial investigation work plans were not drawn up. The trend is improving, as in the 2024 exercise this was true for 60 % of cases. In the remaining 70 % of cases in 2025, an initial work plan was produced, while in 18 % of the total cases the initial work plan was also updated (as opposed to 5,77 % in 2024). The improvement correlates with the majority of investigations analysed (90 % of cases) opened after a revision of the GIPs took place in October 2021 ([64]). The Committee reiterates its view that a consistent approach is beneficial to OLAF's operations ([65]). Having work plans drawn up at the start of an investigation, and updated whenever necessary, provides OLAF's management with a concrete tool to monitor the duration and progress of investigations and to make the best use of its staffing resources. The Committee trusts that Article 33(1) and (2) of the newly adopted GIPs will be applied consistently in the future.

69. The Committee's analysis also found a certain degree of heterogeneity in the assignment of operational priority to cases. Only 5 investigations that exceeded 36 months ([66]) were explicitly granted priority. The analysis also showed, however, that, despite not being explicitly granted operational priority, 22 cases were closed shortly after exceeding 36 months of duration. The Committee stresses the importance of recording decisions to grant priority to an investigation in the case file, as well as of documenting any subsequent change to such decisions.

70. The analysis conducted by the Committee on cases running over 36 months in 2025 shed light on a number of findings. First, there was a decrease in these cases compared with 2024 (33 cases out of 327 in 2025 (10 %) as opposed to 44 cases out of 333 in 2024 (13 %)), as shown in Figure 2, which is a positive development. Second, the analysis also highlighted that most of the investigations were speeded up after reaching 36 months of duration, resulting in most cases being closed after between 36 and 42 months.

([60]) See views and related suggestions expressed in SC Opinion 1/2026, Section 3.2.3.
([61]) Article 33(1), first indent, of the GIPs.
([62]) Article 33(2), of the GIPs.
([63]) Article 33(3) of the GIPs.
([64]) The requirement of drafting a work plan was introduced in the GIPs approved in October 2021. The newly approved GIPs, which entered into force on 1 January 2026, now also require the work plans to be updated.
([65]) SC Opinion 5/2021, recommendation 3.
([66]) [Confidential].

71. The Committee also noted that, by the end of December 2025, out of the 22 closed cases, 16 were closed with recommendations ([67]) (14 financial recommendations, 1 disciplinary recommendation, 2 judicial recommendations and 6 administrative recommendations), 5 were closed without recommendations ([68]), and 1 was discontinued due to the opening of an EPPO investigation into the same facts ([69]).

72. In conclusion, when looking at the continuity of investigations, the Committee found that, in the majority of cases, the duration and identified periods of inactivity were actually justified. In the Committee's view, only a very limited number of analysed cases ([70]), raise concerns about the proportionate character of their duration. The Committee considers that, in these cases, OLAF's investigations were not continuous, and the breaks not justified. In light of the above considerations, the Committee stresses the importance of limiting investigative breaks to the minimum. It also emphasises the need to clearly justify such periods of inactivity in the case file.

2.6. *Monitoring OLAF's implementation of the Supervisory Committee's recommendations*

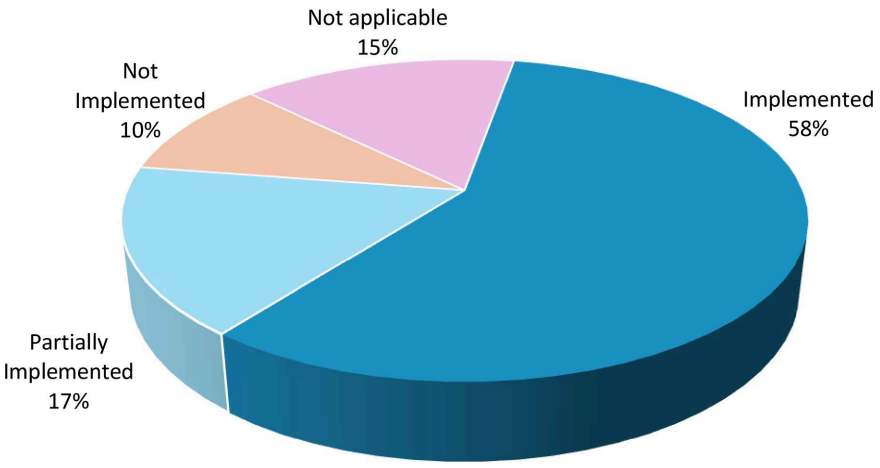
73. Throughout the reporting period, the Committee undertook an in-depth assessment of the implementation of the recommendations it issued to OLAF from 2021 to 2024 through its opinions.

74. The Committee conducted its assessment taking into account OLAF's position as presented in its annual report on implementation of recommendations, and carefully examining the concrete measures adopted to implement the recommendations. The Committee analysed both the substance and the practical impact of OLAF's actions and, where necessary, requested further clarifications and additional supporting documentation and evidence to ensure a comprehensive and objective assessment of the level of implementation.

75. The Committee assessed the level of implementation of a total of 71 recommendations issued in its opinions between 2021 and 2024. It considered that 41 had been implemented, 12 partially implemented and 7 not implemented, with 11 as no longer applicable in the current context. The percentages are displayed below in Figure 3.

Figure 3

Assessment of OLAF's implementation of Supervisory Committee recommendations



([67]) [Confidential].
([68]) [Confidential].
([69]) [Confidential].
([70]) [Confidential].

76. Roughly 70 % of the recommendations subject to this monitoring exercise related to possible amendments in the GIPs. Such recommendations were formulated in various opinions, and primarily in SC Opinion 3/2024, in which the Committee provided observations on the final draft new GIPs intended to be adopted shortly after.

77. The GIPs constitute a key procedural instrument within OLAF's investigative framework. They provide investigators with clear, comprehensive and operational guidance, ensuring consistency, legal certainty and procedural coherence in the conduct of investigations. Their recent revision pursued two main objectives: i) to update specific provisions to ensure full compliance with the applicable legal framework and relevant case law; and ii) to consolidate, to the greatest extent possible, the various internal rules of procedure into a single coherent document, thereby addressing the fragmentation resulting from the coexistence of multiple internal instructions and guidelines.

78. The Committee therefore welcomed the adoption of the revised guidelines, notwithstanding the delay in their finalisation compared with the initial envisaged timeline. The final version of the new GIPs was formally adopted on 11 November 2025 and entered into force on 1 January 2026, marking an important step towards strengthening procedural clarity and institutional coherence.

79. Following their adoption, the Committee was able to assess the extent to which its recommendations had been reflected in the new GIPs. The analysis of the final text suggests that substantial progress has been achieved in addressing a significant number of the Committee's recommendations. Nevertheless, certain aspects were either only partially implemented or not incorporated in the way the Committee had recommended. In light of these outstanding issues, and their relevance to ensuring full procedural robustness and compliance with the applicable legal framework, the Committee will continue to closely monitor, in the exercise of its oversight mandate, the key points set out below.

80. **Duration of investigations.** In recent years, the Committee has issued several recommendations aimed at strengthening OLAF's capacity to manage the duration of its investigations effectively. As seen above, notwithstanding the progress achieved, the Committee considers that certain aspects remain critical to ensure that investigations progress without undue delay. In particular, the Committee reiterates: i) the need to prevent periods of inactivity exceeding three months, and in any case to ensure that such periods are duly recorded and properly substantiated in the OCM; ii) the importance of ensuring that the Review Team's opinions issued prior to the closure of an OLAF investigation contain a comprehensive and well-reasoned assessment of the continuity of the investigation, including duration-related considerations; and iii) the opportunity to establish a dedicated procedure for the systematic review of cases exceeding 24 months, combined with clear prioritisation of those exceeding 36 months, as an effective mechanism to reduce the overall length of investigations.

81. **Changes in the scope of investigations.** The Committee notes that the new GIPs do not address the possibility of limiting the scope of an investigation, whether due to a lack of competence or other reasons. While the Committee acknowledges that instances in which the initial scope of an investigation is reduced or corrected are considered exceptional, it highlights that such cases have occurred in practice. The absence of any guidance leaves uncertainty as to how similar situations should be handled if they reoccur in the future. For this reason, the Committee considers that, even if rare, such scenarios should deserve explicit coverage, if not within the GIPs, then through separate instructions, to ensure proper guidance for investigators, legal certainty and transparency.

82. **Mutual reporting of cases between OLAF and the EPPO**. The Committee has paid particular attention to OLAF-EPPO cooperation since the EPPO's establishment, as shown by SC Opinion 2/2021 on the working arrangements between OLAF and the EPPO and subsequent monitoring exercises ([71]). The practical interaction and cooperation of the two offices is crucial for the correct implementation of the reciprocal reporting duties. This is why the Committee considers that the working arrangements should have provided more guidance on the circumstances

([71]) See Opinion 1/2024 on OLAF and EPPO complementary investigations and related follow-up exercise included in the Supervisory Committee Annual Report 2024; see also SC Opinion on OLAF's reporting duty to the EPPO, expected to be published in the first half of 2026.

concerning the transfer of cases and the ways of doing so. This being said, the Committee also acknowledges that important developments are awaited as part of the revision of the anti-fraud architecture, which will have an impact on the ways that the two bodies cooperate. The Committee will continue to monitor this evolving issue and - within the remits of its mandate - help ensure smooth cooperation.

2.7. *Monitoring of individual complaints submitted to OLAF*

83. As every year, in 2025 the Committee received twice-yearly reports and relevant documents on individual complaints handled by OLAF. The Director-General informed the Committee that OLAF had dealt with eight complaints in total. The Director-General also provided an overview of the complaints dealt with by the European Ombudsman. OLAF provided automatic access to the corresponding cases in the OCM, which contains all relevant documents and information ([72]).

84. The Committee focused on the five complaints whose handling OLAF completed in 2025 (the remaining three were answered by OLAF in 2026).

85. All the complaints analysed were filed by EU staff members. Under Article 90a of the Staff Regulations ([73]), EU officials and other staff members may submit requests to the Director-General of OLAF relating to their rights and how they are treated in the context of investigations conducted by OLAF. They can also submit complaints against an act adversely affecting them in connection with investigations by OLAF.

86. The Committee notes that four complaints were lodged by informants contesting OLAF's decision to dismiss the selection case and therefore not open an investigation.

87. One complaint concerned a request for material and non-material damages under Article 90a of the Staff Regulations by a person concerned in a closed investigation, alleging the unlawfulness of the OLAF investigation.

88. The Committee considers that, in the above-mentioned complaints, OLAF provided sufficient explanations to all complainants and acted in accordance with its obligation under Article 41(2)(c) of the Charter of Fundamental Rights of the European Union on 'the obligation of the administration to give reasons for its decisions'.

3. **Cooperation**

3.1. *Cooperation with OLAF*

89. In 2025, the Committee consolidated its fruitful cooperation with OLAF by maintaining an open and meaningful dialogue with the Director-General of OLAF and his team, and after the latter's term end, with the acting Director-General and her team.

90. The Committee continued the practice of inviting OLAF's Director-General and their staff to its monthly meetings to discuss and be apprised of any matter relevant to the Committee and OLAF's work. The members of the Committee and the Secretariat also held formal and informal meetings with OLAF management and staff as part of the preparations of the Committee's work.

([72]) Pursuant to Article 6(2) of the working arrangements between OLAF and the Supervisory Committee.

([73]) Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community, available at: EUR-Lex - 01962R0031-20140501 - EN - EUR-Lex.

91. The Committee received the following reports from OLAF in line with the OLAF Regulation and established working practices: (i) reports on investigations lasting over 12 months; (ii) reports where recommendations issued by OLAF since 1 October 2013 had not been followed up and for which OLAF received replies from the authorities concerned in the 2024 annual monitoring exercise; (iii) reports on complaints filed with OLAF about procedural guarantees in ongoing OLAF investigations; (iv) reports on cases for which information had been sent to national judicial authorities; (v) a report on deferrals under Article 4(6) of the OLAF Regulation; (vi) a report on OLAF's implementation of SC recommendations in 2024; and (vii) a report on cases in which no investigation had been opened and on cases dismissed

3.2. *Relations with stakeholders*

92. The Committee is accountable to the institutions that appoint its members, and it is also a dialogue partner of the EU institutions. The Committee reports to the EU institutions on its activities; it may issue opinions at their request; it produces reports on investigative matters, and it exchanges views with them at a political level ([74]).

93. The Committee considers it important to maintain regular contact with the EU institutions and OLAF's partners and stakeholders in order to improve the flow of information and obtain feedback about OLAF's performance. This was particularly important during the reporting year, with ongoing work on the evaluation of the OLAF Regulation and the launch of the review of the anti-fraud architecture.

94. The Committee and its Secretariat were in contact with: (i) the Council Working Group Against Fraud 'GAF' (presentation of the 2024 annual report by the Chair on 18 June 2025); (ii) the European Parliament's Budgetary Control 'CONT' committee (presentation of the Committee's 2024 annual report by the Chair on 16 October 2025); and (iii) the Commissioner for Budget, Anti-fraud and Public Administration, Piotr Serafin (who participated in the Committee's plenary of 16 September 2025).

95. The Committee also participated in the annual interinstitutional exchange of views on OLAF on 3 November 2025, hosted by the Danish Presidency of the Council, which focused on the review of the anti-fraud architecture. The Committee reaffirmed its unwavering support for OLAF's role as an independent investigative body holding a central position within the EU's anti-fraud architecture. According to the Committee, some key enablers should be put in place for OLAF to fully deliver on its mission, building on the key pillars of continuity, independence and the upholding of its operational mandate.

96. First, the Committee highlighted that OLAF should strengthen internal controls to shorten the duration of investigations and ensure that interventions are prioritised strategically. Second, OLAF should have all necessary means (human resources, funding, technology) to respond to ever more sophisticated and rapidly evolving ways of committing fraud. Third, in a longer-term perspective, the Committee identified several areas deserving careful consideration which would feed into the upcoming revision of the OLAF Regulation ([75]). Some targeted changes in the OLAF Regulation are warranted to improve clarity and internal coherence, and ultimately to benefit its application and impact. Last, due consideration should also be given to challenges that go beyond the OLAF Regulation itself and concern the wider anti-fraud architecture. For example, the enforcement of OLAF's findings depends on other bodies and competent authorities, which sometimes results in lengthy and uncertain procedures. In this regard, consideration could be given to revisiting the legal status of OLAF's recommendations or reinforcing the competent authorities' accountability for their follow-up.

([74]) Article 15(1) of Regulation (EU) No 883/2013: 'The Supervisory Committee shall address to the Director-General opinions, including where appropriate, recommendations on, inter alia, the resources needed to carry out the investigative function of the Office [OLAF], on the investigative priorities of the Office and on the duration of investigations. Those opinions may be delivered on its own initiative, at the request of the Director-General or at **the request of an institution, body, office, or agency**, without however interfering with the conduct of investigations in progress. […] The institutions, bodies, offices, or agencies shall be provided with a copy of opinions delivered pursuant to the third subparagraph.'

([75]) These are presented comprehensively in SC Opinion 1/2026 *accompanying the Commission evaluation report on the application and impact of the OLAF Regulation* and summarised above under section '2.3 Draft Opinion accompanying the Commission evaluation report on the OLAF Regulation'.

97. The Committee further took part in the implementation dialogue on the review of the anti-fraud architecture with Commissioner Serafin on 10 November 2025.

4. **Administration and resources**

4.1. ***Supervisory Committee's working methods***

98. Between January and December 2025, the Committee held 11 plenary meetings, either in hybrid format or in person. For every major issue examined, the Committee appointed a rapporteur. The rapporteurs worked with the Secretariat to prepare draft reports for discussion at the plenary meetings; they also held informal and formal meetings with relevant OLAF staff and the Secretariat on the drafting of opinions. The Chair, the rapporteurs and the members of the Secretariat also met regularly to work on specific issues.

99. During 2025, the Committee's full composition of five members was restored.

100. Following Mr Thierry Cretin's resignation from the position in July 2024, another member was appointed from the reserve list included in the Decision appointing the members of the Supervisory Committee of OLAF ([76]). This member resigned shortly after, which led to the appointment of Mr Andrei-Atila-Luca Chendi on 1 October 2025.

101. Following Ms Teresa Anjinho's resignation in February 2025, Ms Maria Stylianidi was appointed on 6 May 2025.

4.2. ***The Secretariat***

102. In 2025, the Secretariat continued to support the Committee members in carrying out their duties, reinforcing OLAF's independence. The Committee recalls, as in the previous report ([77]), the importance of the Secretariat having sufficient resources to support both the Supervisory Committee and the Controller of procedural guarantees, and to preserve the necessary separation of tasks between the two bodies.

103. In this regard, the Committee welcomed the arrival in the Secretariat of two additional legal officers in 2025.

104. At the same time, the Head of Secretariat left in February 2025, which resulted in the most senior remaining member of the Secretariat taking on the function of acting Head of Secretariat from March 2025. The recruitment process for a new Head of Secretariat was finalised in early 2026, with the appointment of a new Head of the Secretariat scheduled for 1 April 2026.

105. Following the departure of an administrative assistant, a recruitment procedure for an administrative assistant was also launched.

106. The Committee was involved in all recruitment procedures as per applicable rules. Officials assigned to the Secretariat must never seek or take instructions on the exercise of the Committee's monitoring functions from any government or any institution, body, office or agency. The Committee's involvement in these recruitment procedures ensures the independence of the selection process.

107. Throughout the year, the Secretariat, like the rest of the Commission, continued to operate in hybrid mode, combining onsite and remote work, and carried out the work programme as agreed with the Committee.

([76]) Decision (EU, Euratom) 2022/521 of the European Parliament, the Council and the Commission of 28 March 2022 appointing the members of the Supervisory Committee of the European Anti-Fraud Office (OLAF).

([77]) Supervisory Committee Annual Report 2024, para. 114.

108. The Secretariat continues to be administratively attached (since March 2017) to the Office for the Payment of Individual Entitlements of the European Commission ('PMO'), although it is located in a separate security zone within OLAF's premises. The Committee has expressed its doubts on many occasions in the past – most recently in its Opinion 1/2026 – on whether the attachment of its Secretariat to the PMO is the most appropriate organisational location.

4.3. ***Budget matters***

109. The Committee's budget for 2025 was EUR 200 000. As the Committee operated with a reduced composition for part of the year, the actual amount disbursed by the end of 2025 was EUR 139 982,39, which is approximately 70 % of the total amount.

110. The authorising officer by sub-delegation responsible for expenditure is the Director of the PMO.