

Document Type: <i>Implementing Rule</i>	EFSA/LA/DEC/IMPRUL_103_2025
Effective date: Date of last signature	Supersedes: Version of 14 October 2021 – Decision no. mb211014-a2



mb251211-a7



EUROPEAN
FOOD
SAFETY
AUTHORITY

ANTI-FRAUD STRATEGY OF THE EUROPEAN FOOD SAFETY AUTHORITY 2026 - 2029

Name	Action	Sign
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For the Management Board of the European Food Safety Authority, the Chair Prof. Aivars Bērziņš	Approve	See document

Document history

Plain technical changes to this document (e.g. reference or adaptation to a revised organisational structure; reference to new or modified regulatory documents; corrections not modifying the substance of the document; etc.) are summarised in the following table in chronological order.

Any change in the substance of the document requires the adoption of a new document by the accountable body/entity superseding the document at stake.

Revision No.	Date	Description of Changes
00	19/03/2015	First version of the document
01	14/10/2021	Supersedes: Decision of the Management Board of EFSA of 19 March 2015 concerning the Anti-Fraud Strategy of the European Food Safety Authority.
02	11/12/2025	Supersedes: Decision of the Management Board of EFSA of 14 October 2021 concerning the Anti-Fraud Strategy of the European Food Safety Authority.



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Scope of document

Fraud involving EU funds significantly impacts EFSA's and the EU's reputation. Ethics, integrity, and transparency are paramount for EFSA, and the Authority is committed to ensuring these principles are upheld. EFSA's staff, scientific experts, members of its governing bodies, external contractors and grant-holders must adhere to the highest standards of ethics and integrity in their duties and tasks.

Description

This Decision replaces the 2021 Anti-Fraud Strategy adopted by the EFSA Management Board and strengthens EFSA's approach in fighting against any fraudulent act that might affect its operativity.

References

- Treaty on the Functioning of the European Union.
- Staff Regulations of Officials of the European Union (hereinafter also the "EU Staff Regulations") and the Conditions of Employment of Other Servants of the European Union (hereinafter the "CEOS") OJ 45, 14.6.1962, pp. 1385–1386, as last amended.
- Regulation (EC) No 178/2002, of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, OJ L 31, 1.2.2002, pp. 1–24, as last amended.
- Regulation (EU) 2019/1381 of the European Parliament and of the Council of 20 June 2019 on the transparency and sustainability of the EU risk assessment in the food chain and amending Regulations (EC) No 178/2002, (EC) No 1829/2003, (EC) No 1831/2003, (EC) No 2065/2003, (EC) No 1935/2004, (EC) No 1331/2008, (EC) No 1107/2009, (EU) 2015/2283 and Directive 2001/18/EC (Text with EEA relevance, OJ L 231, 6.9.2019, pp. 1–28, as last amended.



- Regulation (EU) 2019/1381 of the European Parliament and of the Council of 20 June 2019 on the transparency and sustainability of the EU risk assessment in the food chain and amending Regulations (EC) No 178/2002, (EC) No 1829/2003, (EC) No 1831/2003, (EC) No 2065/2003, (EC) No 1935/2004, (EC) No 1331/2008, (EC) No 1107/2009, (EU) 2015/2283 and Directive 2001/18/EC (Text with EEA relevance, OJ L 231, 6.9.2019, pp. 1–28, as last amended).
- European Anti-Fraud Office, “Methodology and guidance for antifraud strategies for EU decentralised agencies and Joint Undertakings”, 1 May 2024.
- European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the Court of Auditors “Commission Anti-Fraud Strategy: enhanced action to protect the EU budget,” COM (2019) 196 final, 29 April 2019.
- European Commission Anti-Fraud Action Plan.
- European Anti-Fraud Office “Methodology and guidance for antifraud strategies for DG’s Anti-Fraud strategies”.
- EFSA strategy 2027, mb210624-a2, adopted at the Management Board meeting held in virtual modality on 24 June 2021.
- Decision of the European Food Safety Authority concerning the terms and conditions for internal investigations in relation to the prevention of fraud, corruption and any illegal activity detrimental to the Union’s interests, mb161214-a6.
- Prevention of fraud, corruption and any illegal activity detrimental to the union’s interests, adopted on 14 December 2016
- EFSA Policy on Independence, adopted by its Management Board in June 2024.
- Decision of the Executive Director of the European Food Safety Authority laying down practical arrangements concerning transparency and confidentiality, ver. 2 - 18.01.2021.

Abbreviations

AFS	Anti-Fraud Strategy
CAFS	Commission Anti-Fraud Strategy
EFSA	European Food Safety Authority
EPA	EFSA Process Architecture
EU	European Union
FR	Financial Regulation
FRA	Fraud Risk Assessment
IALN	Inter-Agency Legal Network
OIA	Operational Initiating Agent
OLAF	European Anti-Fraud Office
OVA	Operational Verifying Agent
TFEU	Treaty on the Functioning of the European Union



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ANTI-FRAUD STRATEGY OF THE EUROPEAN FOOD SAFETY AUTHORITY (EFSA) 2026 – 2029

1. BACKGROUND

1.1 GENERAL CONTEXT

The budget of the European Union (EU) is financed by Member State's budgets and revenues from taxes that directly or indirectly impact EU citizens and undertakings, or their partners. A key principle of EU budgeting is that Union budget money may be used only to implement policies approved or delegated by EU legislators.

The present Anti-Fraud Strategy (hereinafter also "AFS") of the European Food Safety Authority (hereinafter also referred to as "EFSA" or the "Authority") is a revision of the Strategy adopted by EFSA's Management Board in 2021, as planned by its Action Plan.

In the EU legal system, the concept of fraud includes:

- Fraud, corruption and misappropriation affecting the Union's financial interests, as defined in Articles 3 and 4 of the PIF Directive¹;
- Other criminal offences affecting the Union's financial interests, e.g. offences linked to an abuse of procurement procedures where they affect the EU budget;
- Irregularities as defined in Article 1(2) of Regulation (EC, Euratom) No 2988/95² (insofar as they are intentional but not already captured by the criminal offences referred to above);
- Any other illegal activity affecting the financial interests of the EU;
- Serious breaches of professional obligations by staff or members of the Management Board of the agency, as referred to in Article 1(4) of the OLAF Regulation, in the second subparagraph of Article 2(1) of Commission Decision (EC, ECSC, Euratom) No 352/1999³ and in Article 16 of the Staff Regulations⁴, the latter as regards obligations after leaving the service.

Fraud involving EU funds significantly impacts EFSA's and the EU's reputation as it affects the image of the EU, reduces the effectiveness of its administrative action and ultimately may put the EU project at risk⁵. This is acknowledged at the highest level within the Union legal system, as it is shown by Article 325 of the Treaty on the Functioning of the European Union (TFEU), which requires the EU Institutions and Member States to counter fraud and any other illegal activities affecting the financial interests of the Union.

¹ Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law, OJ L 198, 28.7.2017, p. 29–41.

² Council Regulation (EC, Euratom) No 2988/95 of 18 December 1995 on the protection of the European Communities financial interests, OJ L 312, 23.12.1995, p. 1–4.

³ 1999/352/EC, ECSC, Euratom: Commission Decision of 28 April 1999 establishing the European Anti-fraud Office (OLAF) (notified under document number SEC(1999) 802), OJ L 136, 31.5.1999, p. 20–22.

⁴ 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, OJ 45, 14.6.1962, p. 1385–1386.

⁵ European Anti-Fraud Office, "Methodology and guidance for anti-fraud strategies for EU decentralised agencies", Ref. Ares (2013)3560341, dated 25.11.2013 and the European Anti-Fraud Office "Methodology and guidance for anti-fraud strategies for DG's anti-fraud strategies", Ref. Ares (2016)931345 dated 23.02.2016.



The EU fight against fraud has constantly improved over time. In June 2011, the Commission adopted its first Anti-Fraud Strategy⁶ (CAFS), revised in 2019⁷, with the overall objective of improving the prevention, detection and conditions for investigations of fraud, as well as achieving appropriate preparation and deterrence. Based on the lessons learned from the implementation of these documents, a new Action Plan implementing the CAFS was adopted in 2023⁸. The European Commission is committed to taking strong measures to address and mitigate any fraud, corruption or other illegal activity affecting the EU financial interests, especially by developing the anti-fraud policy activities of the European Anti-Fraud Office (hereinafter referred to as "OLAF") and promoting the standards set out in the CAFS within the EU agencies.

To assist the decentralised agencies of the EU, OLAF prepared a specific guidance⁹ (hereinafter also "OLAF guidance" or "guidance document"), revised in 2024, which has been used in the context of the revision of the present document¹⁰.

The present Anti-Fraud Strategy is the result of a revision that was developed considering, among others, the priorities set by the European Commission's latest Anti-Fraud Strategy and Action Plan, OLAF guidance, the outcome of the Fraud Risk Assessment (FRA) carried out in 2024, and the list of red flags identified at the end of the same year for the processes most exposed to fraud. It was also developed following an ex-post evaluation of the previous version of the AFS, an extensive internal consultation process and the external consultation with EFSA's Partner Directorate General of the European Commission, i.e. DG Health and Food Safety, as well as with OLAF.

1.2 CONTEXT SPECIFICALLY APPLICABLE TO THE EUROPEAN FOOD SAFETY AUTHORITY

EFSA is a decentralised agency of the European Union mainly funded by its budget¹¹.

EFSA was set up in 2002 in response to a series of food crises in the late 1990s as an impartial source of scientific advice and communication on risks associated with the food chain. From an institutional perspective, as the other decentralised agencies of the EU, it operates independently from the EU Institutions and other bodies or agencies.

⁶ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the Court of Auditors on the Commission Anti-Fraud Strategy, COM (2011) 376 final - "https://ec.europa.eu/anti-fraud/sites/default/files/docs/body/ec_antifraud_strategy_en.pdf".

⁷ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the Court of Auditors on the Commission Anti-Fraud Strategy, COM (2019) 196 final - "https://ec.europa.eu/anti-fraud/sites/default/files/2019_commission_anti_fraud_strategy_en.pdf".

⁸ Commission Anti-Fraud Strategy Action Plan - 2023 revision {COM (2023) 405 final.

⁹ European Anti-Fraud Office, "Methodology and guidance for anti-fraud strategies for EU decentralised agencies", Ref. Ares (2013)3560341, dated 25.11.2013. On 23 Feb. 2016, however, the European Anti-Fraud Office adopted the "Methodology and guidance for anti-fraud strategies for DG's anti-fraud strategies" (Ref. Ares (2016)931345), with recommendation to the EU Agencies to also take it into account when reviewing/revising their Anti-Fraud Strategies.

¹⁰ European Anti-Fraud Office, "Methodology and guidance for anti-fraud strategies for EU decentralised agencies, bodies and Joint Undertakings", Ref. Ares (2024)404978, dated 5.06.2024 and the European Anti-Fraud Office "Methodology and guidance for anti-fraud strategies for DG's anti-fraud strategies", Ref. Ares (2016)931345 dated 23.02.2016.

¹¹ Some funds are also provided by third countries with which the EU reached ad hoc arrangements for their participation in EFSA's activities. EU decentralised agencies and joint undertakings (JUs) are autonomous bodies with own legal personality, established by a founding regulation. They contribute to the implementation of various European Union policies and support cooperation between the EU and national governments by pooling technical and specialist expertise and knowledge from both the EU institutions and national authorities: Articles 70 and 71 of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012.



Safety in the food chain¹² from farm to fork is at EFSA's core. EFSA contributes to protecting human life and health, taking account of animal health and welfare, plant health and the environment.

EFSA delivers independent and transparent scientific advice to policy makers, through cooperation with its partners, and in an open dialogue with society.

EFSA's vision and values are described in EFSA's Strategy 2027.¹³ To accomplish its mission and tasks, EFSA cooperates with interested parties to promote the coherence of EU scientific advice and leverage on expertise and work by individual experts and competent organisations, who are its main knowledge partners.

This creates a microcosm of interaction taking place in EFSA's own governance bodies, such as its Advisory Forum, or in the National Focal Points, Scientific Committee and Scientific Panels and its Scientific Networks.

Likewise, EFSA collaborates with other EU agencies, bodies and joint undertakings, as well as international organisations and risk assessors in third countries to increase outreach and joint food safety impact. EU citizens are the ultimate beneficiaries of its work: EFSA engages with them and with its stakeholders¹⁴ through a multitude of platforms and fora.

Between 2014 and 2019, EFSA handled a budget of approximately €79 million per year. In 2020, with the adoption by the EU co-legislators of the Transparency Regulation¹⁵ EFSA's budget gradually increased. In 2024, EFSA's total budget amounted to €161.3 million, of which €153.7 million originated from the EU budget, representing approximately 95.29% of the Authority's overall funding.¹⁶

The Transparency Regulation assigned new tasks to EFSA with the overall objective of increasing the transparency and sustainability of the risk analysis process. Amongst the tasks introduced by this Regulation, EFSA is now required to:

- a. proactively disclose all the information it receives, or it uses to issue its scientific outputs, assessing in an individual manner confidentiality requests it receives from applicants;
- b. manage an ex-ante notification system whereby forthcoming applicants are required to notify studies they performed or intend performing to support a future application process, also monitoring compliance;
- c. carry out public consultations on all application dossiers it deems valid or admissible;

¹²Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, OJ L 31, 1.2.2002, p. 1. ("EFSA Founding Regulation").

¹³ EFSA Strategy 2022-2027, adopted by the EFSA Management Board on 24 June 2021, updated edition, available online at <https://www.efsa.europa.eu/sites/default/files/2025-06/efsa-strategy-2027-updated.pdf>.

¹⁴See: EFSA Stakeholder Engagement Approach, 2016.

https://www.efsa.europa.eu/sites/default/files/EFSA%20Stakeholder%20engagement%20approach_FINAL.pdf; Decision of the Management Board of the European Food Safety Authority on the criteria to register stakeholders and the mechanisms to engage with stakeholders, adopted on 29 June 2022 < <https://www.efsa.europa.eu/sites/default/files/Document18992.pdf>>. More information is available on EFSA's dedicated page on Engagement Platform at the following link: <https://www.efsa.europa.eu/en/stakeholders/engagement-platforms>.

¹⁵Regulation (EU) 2019/1381 of the European Parliament and of the Council of 20 June 2019 on the transparency and sustainability of the EU risk assessment in the food chain and amending Regulations (EC) No 178/2002, (EC) No 1829/2003, (EC) No 1831/2003, (EC) No 2065/2003, (EC) No 1935/2004, (EC) No 1331/2008, (EC) No 1107/2009, (EU) 2015/2283 and Directive 2001/18/EC, OJ L 231/1, 6.9.2019.

¹⁶EFSA Consolidated Annual Activity Report 2024, European Food Safety Authority, 2025, doi:10.2805/3232075, pp. 1-130, available at the following link: <https://www.efsa.europa.eu/en/corporate-pubs/annual-reports>.



- d. it provides general pre-submission advice on forthcoming applications, or specific pre-submission advice for renewals.

To implement the new tasks assigned with the Transparency Regulation, from 2020 to 2024 a progressive increase of 106 staff members has been gradually implemented as reflected in the Authority's establishment plan. In October 2025, EFSA employed 570 statutory staff ¹⁷.

A more limited resource increase is now planned and forecasted in the context of the implementation of the One Substance One Assessment legislative package¹⁸. In this framework, EFSA will play a key role in the implementation of the Common Data Platform¹⁹, aimed at creating a common digital platform for all Union regulatory bodies contributing to the regulation of the chemical sector.

Cooperation with national authorities is at the core of EFSA's Strategy 2027. Outsourcing or co-creation via grant awarding procedures is necessary for an agency that must cover a remit as broad as EFSA's, ranging from animal health and welfare to plant health to food contact materials and pesticides.

EFSA awards grants to competent organisations designated by the Member States participating for the implementation of projects and activities contributing to its mission.²⁰ In addition, the Authority makes recourse to public procurement procedures to purchase services in both scientific and non-scientific areas. In the coming years, EFSA envisages stable expenditure allocated to scientific grants and procurements.²¹

Staff working in agencies are subject to the Staff Regulations of Officials of the European Union (hereinafter also the "EU Staff Regulations") and the Conditions of Employment of Other Servants of the European Union (hereinafter the "CEOS"). They have the duty to report to their immediate superior, the Executive Director or the Management Board of the agency or directly to OLAF any facts which give rise to a presumption of the existence of possible illegal activity, including fraud or corruption, detrimental to the interests of the Union, or of conduct relating to the discharge of professional duties which may constitute a serious failure to comply with the obligations of officials of the Union.

The duty to report to OLAF can take place in any of the 24 official EU languages, through several channels such as mail, secured email, land mail or via the Fraud Notification System (FNS)²². Irrespective of the reporting channels, OLAF deals with the received information in a secure and confidential manner. EFSA has also the obligation to report to

¹⁷ EFSA Programming Document 2021-2023 adopted on 17 December 2020

["https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/amp2123.pdf"](https://www.efsa.europa.eu/sites/default/files/corporate_publications/files/amp2123.pdf).

¹⁸ Proposal for a Directive of the European Parliament and of the Council amending Directive 2011/65/EU of the European Parliament and of the Council as regards the re-attribution of scientific and technical tasks to the European Chemicals Agency, COM(2023) 781 final; Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EC) No 178/2002, (EC) No 401/2009, (EU) 2017/745 and (EU) 2019/1021 of the European Parliament and of the Council as regards the re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals, COM(2023) 783 final; Proposal for a Regulation of the European Parliament and of the Council establishing a common data platform on chemicals, laying down rules to ensure that the data contained in it are findable, accessible, interoperable and reusable and establishing a monitoring and outlook framework for chemicals, COM(2023) 779 final.

¹⁹ Proposal for a Regulation of the European Parliament and of the Council, establishing a common data platform on chemicals, laying down rules to ensure that the data contained in it are findable, accessible, interoperable and reusable and establishing a monitoring and outlook framework for chemicals, COM(2023) 779 final.

²⁰ Competent organisations designated by the Member States,

https://efsa.my.site.com/competentorganisations/s/competentorganisation/CompetentOrganisation_c/00B1v000009LqfEAS >

²¹ EFSA Programming Document 2025-2027 adopted on 12 December 2024,

< <https://www.efsa.europa.eu/sites/default/files/2025-01/programming-document-2025-2027.pdf> >.

²² Via the solution available online at <https://fns.olaf.europa.eu>



the European Public Prosecutor's Office (EPPO) any criminal conduct in respect of which the EPPO could exercise its competence (Article 24(1) of Regulation 1939/2017).²³

2. INTRODUCTION

In October 2021, EFSA adopted its second Anti-Fraud Strategy and the related Action Plan.²⁴ The said Anti-Fraud Strategy and related Action plan prescribed the initiation of a review of the AFS in place by the end of 2024, with the possibility for the Executive Director of tabling a revised AFS for discussion or adoption by its Management Board.

Ethics, integrity and transparency are key issues in the EU institutions and bodies, and the Authority commits to ensuring that these principles are properly applied. EFSA's staff, scientific experts, members of its governing bodies, as well as external contractors and grant-holders, must apply the highest standards of ethics and integrity in the exercise of their duties and tasks.

Based on the above premise, the present Anti-Fraud Strategy has been developed around the following principles:

- zero tolerance for fraud.
- transparency: on the use of EU funds.
- cost-effectiveness: in achieving its strategic objectives and in communicating them, both internally and externally.
- proportionality: Anti-Fraud actions shall correspond to the fraud risk level.
- fight against fraud as an integral part of internal control.
- professional integrity and competence of EU staff.
- fraud prevention, notably fraud-proofing of spending programmes.
- effective detection capacity and timely exchange of information with investigative bodies such as OLAF or prosecutorial bodies such as the EPPO.
- swift correction (including recovery of defrauded funds and judicial or administrative sanctions).
- good cooperation between internal and external players, between the EU and national authorities responsible, and among the departments of all EU institutions and bodies concerned.
- effective internal and external communication in the fight against fraud.

Furthermore, the present Strategy covers fraud without any direct financial impact for the EU, the different management modes as well as operational and administrative appropriations.

EFSA will report, without undue delays, any instance of suspected fraud to OLAF, which is competent to investigate these cases²⁵, or, where the case may be, to EPPO for cases where it may exercise its competence.

²³ Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO'), OJ L 283, 31.10.2017, p. 1–71.

²⁴ EFSA's Anti-Fraud Strategy 2021 adopted on 14 October 2021, available online at

https://www.efsa.europa.eu/sites/default/files/2024-02/anti-fraud-strategy-efsa-2021_3.pdf.

²⁵ Decision of the European Food Safety Authority concerning the terms and conditions for internal investigations in relation to the prevention of fraud, corruption and any illegal activity detrimental to the union's interests, adopted on 14 Dec. 2016.



3. FRAUD RISK ASSESSMENT

In line with OLAF's guidance document, the revision of EFSA's Anti-Fraud Strategy was defined considering the outcome of the Fraud Risk Assessment carried out in the second half of 2024, whose outcome was endorsed by EFSA's Management Team in December 2024. The Fraud Risk Assessment was performed taking into consideration the definition of "fraud" as provided by OLAF in the guidance document (see above, § 1).

The concept of fraud encompasses any misbehavior at detriment of EFSA that is carried out both internally and externally that may infringe on EFSA's financial interests²⁶ as well as any misbehavior that may lead to image or reputational damages in addition to the financial impacts. "Intention" is the key element distinguishing fraud from irregularity, and it is often associated with deceptive activities resulting in acts or omissions leading to unauthorised or illegal advantages. On the other hand, motivation (e.g. financial problems, greediness, etc.), justification (e.g. "everybody does it") and opportunity (e.g. key role within the organisation) represent key factors explaining the occurrence of fraudulent activities.

During the Fraud Risk Assessment, all EFSA Process Charters, including their process variants (as referred to in the EFSA Process Architecture - EPA),²⁷ were analysed with the aim of identifying potential fraud risks associated to the specific operational areas. All processes linked to EFSA's core business were duly considered, ranging from plant protection products' evaluations to assessment of regulated products or general mandates, as well as those regarding talent selection, competing interest management, grants and procurement, talent management, transparency and confidentiality and digital transformation. The FRA saw the engagement of the concerned Process Leaders and Process Owners, assessed in accordance with the Risk Management methodology applied in EFSA for the performance of Risk Assessments.

The FRA assigned a risk rating for each identified fraud risk – at process level - by assessing the probability of occurrence ("likelihood") and the consequences ("impact") on the achievement of the process objectives. In particular, the impact/likelihood approach determined the significance of fraud risks utilising a five-point scale.

Following the assignment of a risk level, the FRA matched each risk level with a predetermined response to that risk²⁸.

The results of the Fraud Risk Assessment were documented into an internal Fraud Risk Register available to all actors and staff with the aim of providing an overview of the fraud risks potentially impacting EFSA's operations.

In particular, the aim of the Fraud Risk Assessment is to ensure that the most significant fraud risks are adequately managed within EFSA and to enable the Authority to determine the strategic objectives to be implemented with its Anti-Fraud Strategy.

²⁶ For an explication of EU financial interests: Art. 325 of the Treaty on the Functioning of the European Union.

²⁷ EFSA Process Architecture (EPA) 2019-2020

²⁸ Possible actions addressing the risk identified are: 1. REDUCE. This is the most common risk response. Actions and decisions are taken to decrease the risk likelihood or impact, or both. 2. TRANSFER OR SHARE. Transfer the risk by shifting it or otherwise sharing a portion of it with a third party, for example via an insurance contract or by outsourcing parts of the activity or the entire activity. 3. AVOID. The agency can do this by discontinuing the activities or objectives at risk or at least the parts of them that are considered unacceptable. 4. ACCEPT. Accept the risk if no further action to reduce, transfer or avoid exposure to risk is possible, necessary or if the costs would be disproportionate to the expected results.



The main risks identified in the Fraud Risk Assessment are presented in Annex 1, and its key conclusions are as follows:

- no critical fraud risks were identified.
- the operational areas that resulted potentially more exposed to fraud risks are:
 - Financial management and procurement.
 - Talent management.
 - Transparency and confidentiality.
 - Digital transformation.

After the Fraud Risk Assessment, an analysis of the EFSA's Anti-Fraud Strategy adopted in 2021, including its action plan and achieved results, a benchmark analysis with the Anti-Fraud Strategies adopted by EFSA's "sister agencies"²⁹ and a gap analysis were performed with the aim of identifying areas of improvement to enhance EFSA's Anti-Fraud Strategy.

While confirming the validity of the 2021 AFS, the Report also recommended EFSA update the Strategy and its Action Plan to seize a number of opportunities mainly linked to aligning the documents with the 2024 OLAF guidance for agencies. Based on its outcomes, the present Strategy is revised to provide a comprehensive overview identifying in a single document all resources assigned by EFSA to counter fraud and a list of main risks identified.

Furthermore, in line with the OLAF 2024 guidance document for agencies, the action plan implementing the 2021 AFS has been revised considering the experience gained to make it more accurate and realistic. Experience provided numerous ideas for new actions to be included in the revised plan, notably on the use of data mining and other IT tools, cooperation with the EPPO and with the decentralised agencies. The resulting action plan is available as Annex 2.

The actions set out in the present strategy focus on ensuring the legality of EFSA's operation and the impartiality of the actions EFSA undertakes by leveraging on the principles set out in the Accountability Policy Statement adopted in Q4 2024³⁰.

4. STRATEGIC OBJECTIVES

EFSA's Anti-Fraud Strategy covers all stages of the Anti-Fraud cycle: prevention, detection, investigation, and recovery/sanction. Driven by EFSA's values of excellence, independence, openness, accountability, and cooperation, this strategy addresses the outcomes of the 2024 Fraud Risk Assessment and confirms the Strategic Objectives identified in the 2021 AFS. This revised Strategy aims to enhance the Authority's organisational agility and ensure the delivery of trustworthy scientific assessments and communications, while also empowering staff's accountability as outlined in EFSA's Strategy 2027.

²⁹ European Environment Agency (EEA), European Medicines Agency (EMA), European Chemicals Agency (ECHA) and European Centre for Disease Prevention and Control (ECDC) Anti-Fraud Strategies.

³⁰ Accountability Policy Statement, EFSA/GPS/POL_006_2024, available online at <https://www.efsa.europa.eu/sites/default/files/2024-10/accountability-policy-statement.pdf>.



EFSA's Anti-Fraud Strategy includes the following strategic objectives:

Strategic objective n.1: Continue enhancing an environment and culture that reflects EFSA's intolerance to fraud

Continuing to enhance an Anti-Fraud culture supported by high levels of awareness, integrity and transparency is essential to ensure EFSA's commitment to providing high-quality scientific advice. A common and shared understanding of the concept of "fraud" and knowledge of the processes governing the management of fraud risks are necessary elements to facilitate fraud deterrence.

Expected outcome: consolidate Anti-Fraud culture in EFSA's operational environment.

Anti-Fraud cycle stage: prevention.

Strategic objective n.2: Strengthen fraud risk monitoring

An agile and effective monitoring system is necessary to keep fraud risks at acceptable levels. While fraud risk monitoring remains part of the overall risk assessment cycle, elements supporting the management of potentially fraudulent risks are reinforced. Appropriate resources are provided to those engaged in fraud risk monitoring at all managerial levels. For instance, EFSA adhered to the use of the Early Detection and Exclusion System managed by DG BUDG of the European Commission (EDES), will deploy Summa, will update the e-training course on anti-fraud, and will schedule an ad hoc training session for managers in cooperation with OLAF.

Expected outcome: improved effectiveness of the EFSA fraud risk monitoring system.

Anti-Fraud cycle stage: prevention.

Strategic objective n.3: Maintain a robust system for fraud detection and investigation

EFSA relies on well-established instruments and control procedures to detect and investigate fraudulent activities. For instance, it relies on the systematic check and verification foreseen available in EDES and on the veracity checks of a random sample of DoIs submitted in the context of this decision by experts, contractors and grant beneficiaries. These checks are carried out by EFSA as well as external controllers, coupled with proportionate, effective and dissuasive sanctions for actions or omissions in breach of this policy and of its implementing procedures and rules. To ensure continuous improvement, EFSA is committed to enhancing tools (e.g. processes, procedures, guidelines) that provide reasonable assurance of fraud detection. Emphasis is placed on areas and groups with higher exposure to potentially fraudulent activities. This holds true for processes aimed at ensuring the impartiality of experts cooperating with the Authority, the procuring of goods and services, and the development of technical solutions.

Expected outcome: consolidate EFSA's capability to detect and investigate fraudulent activities.

Anti-Fraud cycle stage: detection and investigation.

Strategic objective n. 4: Increase readiness in recovering damages and in sanctioning fraudulent activities

Tools are provided to timely process recoveries, and sanctions should the occurrence of fraudulent activities be established. For instance, it aims at putting in place a toolkit to support EFSA staff to recover damages and sanctioning fraudulent activities.



Expected outcome: Ensure the tools are available to recover damages and to sanction fraudulent activities.

Anti-Fraud cycle stage: recovery/sanction.

The attainment of these strategic objectives is ensured through the deployment of the resources listed in § 5 via an Action Plan annexed to this Strategy (Annex 2). This plan sets out all actions, owners, expected resource investments, timelines, and success indicators for each entry. A list of main risks identified is outlined in Annex 1 to support responsible actors identify potentially fraudulent activities early on in a more objective manner.

For monitoring purposes, according to OLAF guidance, the action plan should be revised annually to assess the performance of the AFS against its indicators. The results of monitoring must be compiled in the Consolidated Annual Activity Report, including reasons for any lack of progress on some indicators, and reported to the Management Board.

5. RESOURCES DEVOTED TO THE IMPLEMENTATION OF THE STRATEGY

Considering the importance EFSA assigned to the need to prevent fraudulent activities in the context of its operations, over the years the Authority continuously increased the resources, and the tools devoted to the implementation of this Strategy. Without prejudice to the acknowledgment of the central role played by OLAF and EPPO in the fight against fraud, this section includes a list of internal actors, with their respective roles as well as a non-exhaustive reference to other policies, technical solutions and procedures which contribute to this endeavor. Indeed, it is an undeniable fact that all staff and external collaborators contribute to the successful implementation of the Strategy, albeit with different degrees of ownership and accountability, depending on their role, function, grade, or seniority.

Actor	Role	Technical solution used
Members of EFSA's Management Board.	Adopting and verifying implementation of this Strategy, adopting EFSA's internal rules, workplan and annual activity report reporting on implementation of the Strategy, and setting up the internal control systems.	Management Board document Management system, audio recording, meeting minutes, decisions and adopted rules.
Executive Director.	The responsibility for the Anti-Fraud activities lies in the hands of the Executive Director, as authorising officer in charge for implementing the decisions of the Management Board and the budget of the agency.	Document Management System, correspondence workflow, delegation decisions, decisions as authorising officer.



Heads of Departments and Heads of Unit.	Holding the primary responsibility for the prevention and detection of fraud throughout the organisation. Ensuring staff reporting to them are aware of applicable requirements and held accountable.	Learning workflow; annual appraisal workflow.
Review Function Leader in EFSA's Legal Affairs Services Unit.	Performing fraud risk assessment, coordination of implementation of Anti-Fraud strategy.	Not applicable.
Members of EFSA's Legal Affairs Services Unit.	Ensuring timely validation of screening performed on Declarations of interests as submitted by EFSA external experts, ensuring proper coordination to secure compliance with Anti/Fraud Strategy Action plan and providing advice easing compliance with ethics and integrity matters.	DoI technical solution and workflow, EFSA Intranet, Document Management System, e-mail.
Information security officer.	The Information Security Officer proposes solutions for increasing IT security measures and performs systemic IT security checks and trainings.	Information Security Measures and Tools.
OIAs, project officers, project managers, OVAs, Authorising officers and more in general resource and people managers.	Ensuring compliance with Financial Regulation and EFSA internal rules.	Document Management System, Ex ante exception workflow, Summa, the EC <i>Système de gestion du Personnel</i> (Sysper) and ServiceNow.
All statutory staff.	Reporting cases of potential fraud.	E-mail, annual dialogue, mid-term dialogue, appraisal workflow.

Staff active in this field can find relevant instructions, processes, procedures and information in the intranet microsite dedicated to ethics and integrity matters and Anti-Fraud³¹. The microsite contains practical information, such as the provisions regarding the management of conflict of interest, guidelines on whistleblowing, outside activities, post-employment activities (including revolving door rules), red flags for an early identification of fraudulent activities, what to do when encountering potentially fraudulent activities, cooperation with OLAF.

6. ENTRY INTO FORCE, VALIDITY & REVIEW/REVISION

The content of this revised Strategy implements the outcome of the review of the AFS adopted in 2021. The update of the Ethics Manual was delayed gathering sufficient experience and reflecting lessons learned regarding compliance with the EU Artificial

³¹ Available on EFSA's intranet at the following address: <https://efsa815.sharepoint.com/sites/policies-and-resources/SitePages/Ethics-Awareness-%26-Fraud-Prevention.aspx>.



Intelligence Act³². Another lesson learned from the implementation of the previous version of the AFS is that EFSA should make its training sessions available on platforms that can be updated upon request, avoiding dependency on specific technologies that may become suddenly unavailable, and that synergies should be sought with the European Commission.

The Action Plan has been revised to include more concrete actions, detailing the extent to which EFSA staff are engaged in their daily activities to combat fraud.

The validity of this Anti-Fraud Strategy aligns with the EFSA Strategy 2027³³ and will enter into force on the day of its adoption by the EFSA Management Board. The review of this document shall be initiated three years following the adoption of the revised strategy, i.e. by the end of 2028. Notwithstanding the fact that OLAF recommends a timespan of validity not longer than three years, EFSA considers that the review should be performed on the entire duration of the time span for validity, which implies it should start at its end, and should result in a proposal for a revised AFS, or in the confirmation of the present AFS, by end 2029. Following this review, the Executive Director may submit a proposal to the Management Board to revise the current Anti-Fraud Strategy.

The present Decision repeals the Decision of the Executive Director of 17 October 2021 concerning the implementation of the EFSA Anti-Fraud Strategy³⁴.

Adopted on 11 December 2025
For the EFSA Management Board

[to be signed]

Aivars Bērziņš
Chair of the Management Board

³² Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act), OJ L, 2024/1689, 12.7.2024.

³³ EFSA Strategy 2027, Science, Safe Food, Sustainability, European Food Safety Authority, 2021, available at the following link: <https://www.efsa.europa.eu/sites/default/files/2021-07/efsa-strategy-2027>.

³⁴ Decision of the Executive Director concerning the implementation of the EFSA Anti-Fraud Strategy, EFSA/LAS/DEC/2540141/2021.



ANNEX 1 - SENSITIVE
MAIN FRAUD RISKS IDENTIFIED

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ANNEX 2

ACTION PLAN

Strategic Objectives	Expected operational result	Action	Risk addressed	Owners	Target date	Indicators
Strategic objective n.1: Continue enhancing an environment and culture that reflects EFSA's intolerance to fraud.	Expected Operational Result 1.1: Staff members' fraud awareness and knowledge of the EFSA Anti-Fraud regulatory framework is enhanced.	Monitor the attendance of statutory and non-statutory staff at the Anti-Fraud training module.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality.	Human Capital Services for staff.	By Q4 each year.	100% of statutory and at least 80% non-statutory staff attend the Anti-Fraud training module.
		Training offers on ethics, integrity and Anti-Fraud are made available to staff involved in fraud prevention activities.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality.	Legal Affairs Services for information sharing and content creation, where needed.	By Q4 each year for e-course and EU online training. By Q4 every other year ad hoc course for managers.	Training offer on ethics, integrity and Anti-Fraud is provided to concerned staff in the form of an e-training course, the EU online Anti-Fraud basic course and an ad hoc training course for managers more exposed to fraud.
		Review of internal decisions implementing the AFS (Decision about cooperation with OLAF; Decision about whistleblowing, etc.).	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services.	By Q4 2027	Relevant decisions are either confirmed as fit for purpose or revised as appropriate and submitted to decision maker in charge.
	Expected Operational	Training sessions for Process Owners /Managers to address	Talent Management, Financial	Human Capital Services for inclusion in the Learning	By Q2 2026 and	At least 80% of Process Owners/Managers



Strategic Objectives	Expected operational result	Action	Risk addressed	Owners	Target date	Indicators
	Result 1.2: Managers are Anti-Fraud agents.	the risks associated with the areas that resulted potentially more exposed to fraud.	management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	catalogue and for availability of the sessions. Legal Affairs Services for the identification or delivery of the training offer.	again by Q2 2028	concerned participate in the training sessions.
		Review of “red flags” for the processes that resulted potentially exposed to fraud based on the Fraud Risk Assessment.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services.	By Q4 2026 and since then, every other year.	Validation of changes to the “red flags”, if any, by the Accountability Council.
	Expected Operational Result 1.3: External collaborators are aware of EFSA’s Anti-Fraud regulatory framework.	Monitor the availability of Anti-Fraud training material elaborated by the EC and OLAF for scientific experts and external contractors/grant-holders tailored for EU Institutions and Agencies.	Transparency and Confidentiality, Digital Transformation, Financial Management and procurement.	KNOW Unit for availability of training material for experts. Financial Services for availability of training material for contractors and grant beneficiaries.	By Q4 each year.	Reports to the Accountability Council on a yearly basis.
		Review of the electronic Anti-Fraud information module developed for scientific experts and external collaborators.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services coordinating and in charge for content creation. KNOW Unit in collaboration with Human Capital Services) for platform and related technical solutions.	By Q3 2026	Review (possibly revised) module.
		EFSA scientific experts (members of Scientific Panels, Scientific Committee and Working Groups) and EFSA	Transparency and Confidentiality, Digital Transformation,	Legal Affairs Services KNOW Unit	By Q4 each year	Training sessions or Training materials are



Strategic Objectives	Expected operational result	Action	Risk addressed	Owners	Target date	Indicators
		contractors are provided training or training material to ensure compliance with EFSA Independence Policy.	Financial Management and procurement and Competing Interest Management.	Financial Services		made available to concerned individuals.
Strategic objective n.2: Strengthen fraud risk monitoring.	Expected Operational Result 2.1: Effectiveness of fraud risk monitoring is reinforced.	Monitoring the implementation of the Anti-Fraud action plan.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services	By Q4 each year	Report on the progress of the implementation of the Anti-Fraud Action Plan to the Assurance Council.
		Review/revision of the EFSA' Process Charters in the context of EFSA's Annual Planning Cycle.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Process owners and process leaders coordinated by GPS	By Q2 each year	EPA Process charters updated.
		Submission of Declarations of Interest by Members of EFSA-s Scientific Committee and Panels.	Transparency and Confidentiality, Digital Transformation, Financial Management and procurement. and Competing Interest Management.	Legal Affairs Services	By Q4 each year	Members of EFSA's Scientific Committee and Panels are made aware of DoI submission requirements.



Strategic Objectives	Expected operational result	Action	Risk addressed	Owners	Target date	Indicators
		EDES and SUMMA ³⁵ are deployed and available to EFSA Financial Unit and used on a regular basis.	Transparency and Confidentiality, Digital Transformation, Financial Management.	Financial Services	By Q1 2026	Financial Unit staff have been trained to work on technical solutions.
		The action plan is revised annually.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services	By Q4 each year starting from 2026.	The outcome of the revision is presented to the Audit Committee of the Management Board.
	Expected Operational Result 2.2: Managers coordinate anti-fraud sentinels.	Process owners/managers inform the respective process co-workers on the “red flags” identified and coach them in the detection of those “red flags”.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Process owners and process leaders.	By Q3 each year	Information provided to new process coworkers within two months from their engagement in the process. Bi-annual info refreshment to all process coworkers (in occasion of the “red flag” review).
Strategic objective n.3: Maintain a robust system for fraud detection and investigation.	Expected Operational Result 3.2: EFSA’s detection and investigation system is aligned to the	Exchange of good practices with the Fraud Working Group within the Inter Agency Legal Network (IALN).	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services	Once a year, Q4 each year.	Communication with the Chair of the Anti-Fraud Working Group of the IALN.

³⁵ EDES is the Early Detection and Exclusion System, developed to prevent unreliable persons and entities from receiving EU funds in direct and indirect management. SUMMA is the Central Financial System of the European Commission, developed to replace the current system, ABAC.



Strategic Objectives	Expected operational result	Action	Risk addressed	Owners	Target date	Indicators
	EU best practices.	Participation in the inter-Agency pool of investigators and contribution to investigations.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services	Upon request.	Informed Management Team Decision on requests for support received. Contribution to Agency pool of investigators.
		Technical solution for plagiarism check is purchased or revised if already in place and deployed to identify cases of plagiarism to validate acceptance of outsourced deliverables and/or written tests of candidates to statutory staff positions.	Transparency and Confidentiality, Digital Transformation, Competing interest Management.	Financial Services. Human Capital Services	By Q3 2026	IT technical solution deployed by Q3 2026.
		Service provider in place to monitor online testing of candidates to statutory staff positions from remote.	Talent Management.	Human Capital Services	By Q1 2026.	Service in place.
Strategic objective n. 4: Increase readiness in recovering damages and in sanctioning fraudulent activities.	Expected Operational Result 4.1: EFSA sanctions fraudulent activities and recovers associated damages timely and efficiently.	Development of a high-level toolkit guiding through steps for the recovery of damages following ascertainment of a fraudulent act.	Talent Management, Financial management and procurement, Digital Transformation, Transparency and confidentiality and Competing Interest Management.	Legal Affairs Services	By Q4 2026	Toolkit made available to EFSA staff.