

## Note to the Management Board

### **EFSA final Programming Document 2022-2024 & draft Programming Document 2023-2025 and Statement of Revenues and Expenditures 2022**

#### **1. Objective**

The following documents are submitted for possible adoption by the Board:

- Final Programming Document 2022-2024, including the final annual work-programme 2022
- Statement of Revenues and Expenditures 2022 (Budget 2022)
- Draft Programming Document 2023-2025, including the draft annual work-programme 2023.

#### **2. Background and Scope**

In December 2020, the Board adopted the final Programming Document 2021-2023 and the draft Programming Document 2022-2024, in compliance with the requirements of the Programming Document common template of the EU Agencies. These documents build the multiannual programme of EFSA in line with its strategic objectives.

During 2021, the MB adopted the new EFSA Strategy 2027 and its implementation plan, and EFSA has updated accordingly the draft Programming Document 2022-2024 and prepared the draft Programming Document 2023-2025 to reflect the EFSA's multiannual and annual plan towards the implementation of the new Strategy. The programming documents are also in line with the new common templates of the EU Agencies, in force as of 2022. Both documents now reflect:

- The EFSA Strategy 2027 adopted by the Management Board in June 2021;
- the adoption of the Transparency Regulation and full integration of and implementation activities and resources;
- the Commission Opinion<sup>1</sup> received in September 2021 (see annex 1 below).

As in the past, please note that the two Programming Documents overlap and coincide to a large extent in view of the intersecting timeframe. For a more convenient review, please note that the parts where the two documents differ are:

- The annual work-programmes (section III in each of the two documents and its Appendix A, while Appendix B is common)
- The resource annexes (Annex II to V in each of the two documents)
- The annual grants and procurement work programme (Annex XII in each of the two documents)

Regarding the statement of revenues and expenditures the structure reflects the one adopted by the Board in October 2021. The statement of revenues and expenditures 2022 is submitted for Management Board approval.

---

(<sup>1</sup>) Commission Opinion C (2021)6941 of the 30.10.2021 on the draft Single Programming document 2022-2024 of the European Food Safety Authority



### 3. Next Steps

Following the adoption by the Board of the submitted documents (subject to possible revisions that may be made at the Board's meeting), the next steps in the process are envisaged as follows:

- The Final Programming Document 2022-2024 will be published on EFSA's website and submitted to the EU Institutions end January 2022 and become the reference for guiding EFSA's work programme implementation in 2022.
- The Draft Programming Document 2023-2025 will be further processed as follows:
  - by the end of January 2022: the document will be updated as per the actual 2021 execution data, and submitted to the EU Institutions (i.e. Commission, Parliament and Council);
  - during 2022: the document will be revised to address the opinion that will be received from the Commission and to reflect other important developments that will occur during 2022;
  - by December 2022: the document will be submitted for final adoption to the Board.



## Annex 1: Key EC comments on draft SPD 2022-2024 and EFSA follow up on final PD 2022-2024 and draft PD 2023-2025

Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
<b>General comments</b>		
1	The Commission welcomes the draft programming document and appreciates that the Authority has addressed the vast majority of the comments included in the Commission Opinion on the previous one.	Noted and appreciated
2	The Commission appreciates the Authority's contribution to the overarching objective of the EU food law, in particular to maintain a high level of protection of human health and consumers' interests in relation to food, including but not limited to food safety while addressing animal health and welfare as well as plant health within the EU.	Noted and appreciated
3	The Commission invites the Authority to continue prioritising its support to the European Union's activities on food and feed safety addressing biological and chemical hazards, animal health and welfare, plant health, and those related to the area of regulated products. In this respect, the Commission underlines that the tasks needed to enable the Commission to fulfil its legal obligations should take priority over tasks without legal deadlines. Any prioritisation exercise leading to a decrease or to negative priorities in relation to the Authority's core scientific activities would need prior agreement with the Commission.	Focus on fit-for-purpose risk assessments continues to be at the core of the EFSA Strategy 2027. In the context of its core business, EFSA doesn't foresee any downsizing or discontinuation of activities currently mandated. On the contrary, the historical trend shows how the mandate of EFSA is continuously enlarging both in terms of scope and of volumes. The activities related to scientific evolution and preparedness have normally been identified as the lower priority in case of resource conflicts but also this area of investment is necessary to maintain EFSA relevant and effective in executing its core business. These re-prioritisations and resource deployments are dealt with on a rolling basis and in consultation with the relevant EC services.



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
4	<p>The Commission praises the on-going good and constructive co-operation with the Authority in ensuring timely implementation of the Transparency Regulation<sup>4</sup> that applies as of March 2021; a major landmark, which will strengthen the transparency but also the sustainability of the EU risk assessment in the food chain. The Commission appreciates that the draft programming document puts emphasis on the prompt and proper implementation of the Transparency Regulation. In the area of risk communication, a central pillar of the Authority' work, a number of projects have been initiated that will underpin the Commission's general plan on risk communication with the aim to improve the trust of citizens in institutions and the expectations that society places on regulatory science. The Commission invites the Authority to ensure a smooth transition for its new governance, the new Management Board set up as of July 2022, with a new composition including representatives of Member States, civil society and food chain interests, the Commission and the European Parliament. The Commission calls on the Authority to prioritise the preparatory work for the increased contribution from national scientific organisations (so called "Article 36 organisations") in the Authority's scientific work.</p>	<p>EFSA appreciates the good cooperation with EC in ensuring a timely implementation of the Transparency Regulation. The transition to the new governance and the preparatory work for the increased contribution of Article 36 organisations to EFSA's work are indeed priorities for EFSA, as described in the Programming Document.</p>
5	<p>The Commission welcomes the Authority's commitment to support the implementation of the European Green Deal, in particular the Farm to Fork Strategy, the Chemicals Strategy and the Biodiversity Strategy. The Authority is invited to continue collaborating with the Commission in supporting the delivery of the relevant actions of the EU's strategies within the Authority's mandate and in synergy with the other agencies.</p>	<p>EFSA is committed to continue its support to EC for the implementation of the European Green Deal; specific actions and initiatives are described in the Programming Document.</p>



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
6	Scientific knowledge continues to evolve rapidly and the Commission acknowledges the challenges linked to increased complexity of risk assessment and digitalisation, which require the science to adapt and evolve to face those challenges. In this respect, it acknowledges the Authority's commitment to support the digital transformation and willingness to operate with new instruments, data models and methodologies, but calls on the Authority to ensure focus on fit-for-purpose risk assessments.	As per reply to comment 3, focus on fit-for-purpose risk assessments continues to be at the core of the EFSA Strategy 2027, and the digital transformation is meant to support it, of course keeping the balance with the need for innovation and agility and the continuity in the activities for which EFSA is currently mandated.
7	The Commission welcomes and supports the Authority's engagement to further cooperate and work together with the Member States, other EU agencies and risk assessment bodies and international partners on cross-cutting areas in order to achieve synergies and efficiencies on both scientific and organisational aspects, especially under the "one substance-one assessment" approach set out in the Chemicals Strategy. Such cooperation can be achieved through the development, where possible, of common methodologies, common data sets, synchronisation of mandates or joint mandates with a view to better support risk managers in taking policy decisions, as well as efficiency gains.	Noted and appreciated.
8	The Commission welcomes that EFSA considers the Health Policy Agencies Collaboration (HPAC) initiative as the vehicle for the digital strategy and data strategy in EFSA and alignment of technology roadmaps helping also to streamline processes and enable shared services across agencies and SANTE.	Noted and appreciated.



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
9	The Commission acknowledges the importance of stimulating research and innovation in the area of the Authority's mission in order to support risk assessment, regulatory science and related policy-making activities. In this respect, the Commission supports the involvement of the Authority in the EU Research and Innovation Programme cycle and related activities. Such involvement should be considered on a case-by-case basis, noting in particular the relevance of the research and innovation activities for the mandate of the Authority, potential human resources limitations and the need to safeguard the Authority's high standards of independence.	We take note and acknowledge the useful comment. Indeed, there are many research activities with possible links to EFSA's work, so it is important to discern which activities are so relevant to EFSA's work that an involvement will bring return-of-investment. Close liaison with SANTE is in place to assess such involvement on a case-by-case base, also in case of questions about potential (perceived) risks for independence.
10	The Commission welcomes the Authority's plans to revise the draft programming document 2022-2024 to adapt it to the EFSA Strategy 2022-2027, once adopted. Against this background, the Commission considers it important to maintain stability of indicators in the programming document, to allow monitoring over the years.	Noted and taken into account.
<b>Specific comments on the multiannual (2022-2024) and annual (2022) work programme</b>		
11	With respect to the Transparency Regulation, the Commission appreciates that the Authority is placing particular emphasis on the implementation of the new tasks entrusted to the Authority in relation to the submission and treatment of confidentiality requests, and carrying out of public consultations.	Noted and appreciated.
12	The Commission recalls that the Transparency Regulation allows the Authority to rely upon its staff or the designated national scientific organisations referred to in Article 36 of the General Food Law Regulation <sup>10</sup> (so called 'Article 36 organisations') to carry out preparatory work to support the tasks of the Scientific Committee and the Scientific Panels. This includes the possibility for preparing guidance documents, scientific opinions to be peer-reviewed by the latter Committee and Panels before their adoption.	N/A (included in comment below).



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
13	In this respect, the Commission invites the Authority to continue elaborating further the implementation of the new approach to managing the network list of 'Article 36 organisations' including the criteria for the types of activities that it intends to outsource to the 'Article 36 organisations'.	In support of the implementation of the provision from the Transparency Regulation that allows for the possibility for Article 36 organisations to prepare guidance documents and scientific opinions to be peer-reviewed by the Scientific Committee and Panels before their adoption, EFSA is working on the establishment of a new ecosystem framework for partnerships. EFSA has also established under the Advisory Forum a discussion group which is supporting the establishment of such a framework; regular updates on its evolution are provided to the Advisory Forum, and the work will continue together with the MSs with the aim to establish a vision/concept paper for the implementation of the abovementioned new framework - estimated to be agreed in 2022.
14	The draft programming document could better clarify the Authority's role and contribution on policy priorities and new EU strategies, also in synergy with the other EU agencies (for example, EFSA's role and contribution to the Chemicals Strategy, the One Substance One Assessment approach, and EFSA's involvement in the European Climate and Health Observatory under the Adaptation Strategy).	Further information on EFSA's involvement and contribution on policy priorities and new EU strategies have been included in the Programming Documents under Strategic Objective 2. In particular, EFSA's work in relation to the Chemicals Strategy, its collaboration with ECHA for the One Substance One Assessment and with ECDC for the establishment of a "One health" system, and activities to support the Sustainable Development Goals (SDGs) are explained.
15	The Commission notes the information provided in the draft programming document on EFSA's activities related to biological and chemical hazards, animal health and welfare, plant health, human nutrition and regulated products, and the Authority's commitment to continue issuing yearly EU summary reports (i.e. on zoonoses and food-borne outbreaks, surveillance for avian influenza in poultry and wild birds in the EU), antimicrobial resistance (AMR), pesticide residues, veterinary medicinal product residues and Transmissible Spongiform Encephalopathies (TSEs).	Noted and appreciated.
16	The Commission appreciates the Authority's work on cumulative risk assessment methodologies for pesticides and invites the Authority to refer to the Action plan on Cumulative Risk Assessment recently agreed with the Commission.	A reference to the Action plan on Cumulative Risk Assessment agreed with the Commission has been included in the Programming Document.



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
17	The Commission recognises that the Authority has defined independence as one of its fundamental values. The Commission has noted the Authority's commitment to review its independence rules and benchmark them against the approaches adopted by other Agencies <sup>13</sup> . Such a review will be particularly important given the fact that the new composition of the Management Board will be in place as from July 2022	Noted and appreciated.
18	The Commission notes EFSA's approach to evaluations described in Annex IX to the draft programming document, following the EU Better Regulation framework and the "Agencies' handbook on evaluations". The Commission notes that following the third external evaluation of 2018, the Authority will continue to implement the six Management Board recommendations. The Commission welcomes that the Authority's will to take into account the identified results of the mid-term evaluation of the EFSA Strategy 2020 in the preparation of the new EFSA strategy 2022-2027. As regards the internal evaluations, the Commission appreciates that follow-up is captured in EFSA's continuous Plan-Do-Check-Act cycle.	Noted and appreciated.
19	The Commission welcomes EFSA's Internal Control Framework and the Internal Control monitoring criteria presented in Annex X. The Commission appreciates EFSA's continuous, proactive and systematic risk management approach.	Noted and appreciated.
20	The Commission also welcomes the activities of EFSA to optimise access to its data. It reminds the importance of EFSA's involvement in the context of the Commission's IPCHEM data portal and appreciates the commitment in the programming document to cooperate with the Commission to further increase the visibility European chemical monitoring data on the IPCHEM portal. Indications of the specific activities EFSA is planning to undertake in this context should be included in the programming document.	Information on activities EFSA is planning to undertake in relation to the IPCHEM portal has been included in Strategic Objective 2, Expected Operational Result 2.1.5 "Wider access to, and broader exploitation of, data and analytics is achieved".



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
21	EFSA already successfully cooperates with the Commission on several actions as identified by the Chemicals Strategy. This cooperation is very welcomed, so is the general commitment to such cooperation. However, a more detailed description of EFSA's involvement (in the context of EFSA's core tasks and in particular the new "one substance one assessment" approach) as identified in the Annex to the Chemicals Strategy should be added in the programming document.	This information has been added to the Programming document, please see reply to EC comment 14.
<b>Comments on budget and human resources</b>		
22	The Commission acknowledges that the EFSA request for EU contribution corresponds to the ceiling set by the 2021- 2027 Multiannual Financial Framework (MFF). As a result, and once confirmed by the Budgetary Authority in the voted budget, the net EU contribution in 2022, after deduction of the 2020 budget outturn of 0.4 million EUR, will amount to 145.9 million EUR.	Noted.
23	As required by the Framework Financial Regulation Article 32(2) and in line with the recommendations of the Court of Auditors Special Report 2020/22, the performance indicators need to be linked to the Authority's contribution to the implementation of EU policies instead of being focused solely on outputs and activities. In this view, the Commission invites EFSA to define the performance indicators so that this link with policy objectives is as clear as possible.	This has been taken into account in the context of the new performance framework linked to the EFSA 2027 Strategy. In addition, EFSA has agreed with its partner DG SANTE to explore the development of joint indicators, also in cooperation with other EU agencies operating in the same policy fields, at the level of policy impacts.
24	Annex XI to the programming document lists a number of grants signed between the Authority and other entities different from the Commission. The Authority is reminded that this table is aimed at fulfilling the obligation from Article 7 FFR i.e. grants, contributions and service level agreements signed with the Commission. Please reconsider listing there those grants	The table in Annex XI has been amended accordingly.



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
25	The Commission notes that the programming document does not include the table "Additional EU funding: grant, contribution and service-level agreements" in Annex III – Financial resources. It refers to ad hoc grants and delegation agreements, but the new guidelines require a separate table. Moreover, there seems to be a contradiction since Annex III says that no revenues are planned for ad hoc grants and delegation agreements, while Annex XI refers to 162,000 EUR under contribution agreements and 870,000 EUR under Service Level Agreements. The Commission invites EFSA to add the table and align the information between annexes.	The additional EU funding is indicated separately in the Table 30. The only currently running ad-hoc grant agreement between EFSA and EC (DG NEAR) has been concluded and funds received in 2019 for a total amount of 750.000€. The revenues have been indicated in the tables in the year 2019 (not present anymore in the table in line with the template). The other SLAs and grant agreements do not constitute a revenue for EFSA but for other European entities.
26	The Commission acknowledges that 2022 will be the first year when the full needs for the Transparency Regulation are taken into account. The increase of 25 temporary agents and of 6 contract agents follow the reinforcement foreseen therein.	Noted.
27	The Commission took note of the Authority's request of 30 contract agents for five years to cope with a temporary capacity shortage mainly to address the workload in the area of the safety assessment of regulated products. A compromise was found granting EFSA 15 contract agents for the period 2022-24, so 3 years.	The figures regarding contract agents have been updated accordingly.
28	The Commission invites EFSA to adjust the staffing for 2022 as follows: 405 temporary agents, 167 contract agents and 15 ENDS. In accordance with the SLA for IUCLID, the Commission notes that EFSA will recruit four contract agents below its ceiling, as it has "lent" them to ECHA for its Biocides activities	The figures have been updated.
29	The Commission invites EFSA to adjust table 153 on page 17 of the programming document to show only the additional external staff, as the title of this table suggests.	Table 34 "Additional external staff expected to be financed from grant, contribution or service-level agreements" has been amended to show only additional external staff.



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
30	<p>The Commission takes note that clerical tasks are performed by contract agents FG II in EFSA which is in line with the CEOS15. The Commission will monitor that a sufficient number of contract agents FG II will be maintained to ensure that these clerical tasks are performed by the appropriate function group. In this context the 'assistant job family' chapter (Page 179) should be revised to replace AST1 – AST 3 by AST/SC 1 – 3 in accordance with Annex 1A of the Staff Regulations which is the equivalent of contract agents FG II (Article 80 (2) of the CEOS). Also there are no FGI in the Authority so the reference should be deleted.</p>	<p>EFSA's Establishment Plan does not include any AST/SC posts. Staff employed on AST1-3 or FGII contracts are typically also performing a number of tasks that require a higher degree of autonomy and specific knowledge, as per EFSA's competency catalogue, than purely clerical tasks (e.g. quality assurance, stakeholder relations, financial management, tool maintenance, communication planning, monitoring and evaluation, etc). EFSA has outsourced some clerical roles to external service providers (e.g. reception, post office, hussier/archive, mission organisation, relocation services, etc). Therefore, EFSA has not launched any calls at grades/FGs lower than FGIII or AST4 in the past years. EFSA confirms that the reference to FGI has been removed from the SPD 2022-2024.</p>
31	<p>The Commission welcomes the fact that the grades requested for 2022 in the multi annual staff policy plan on Page 173 correctly reflect the reclassification possibilities per grade.</p>	<p>Noted and appreciated.</p>
32	<p>With regard to the reclassification rate for the temporary agents, the Commission notes that the Table 73 of Annex IV (page 182) shows a very high average seniority in all grades over the last five years. The Authority is invited to respect more closely Annex IB of the staff regulations.</p>	<p>The promotion/ reclassification exercise at EFSA, in line with the Organisation's approach to talent management, is instrumental to reward people's top performance and acknowledgment of their contributions to EFSA's success. EFSA has been consistently applying a strategy related to staff engagement, recognition, learning and development. Promotions are an important, but by far not the only means of staff recognition and development. In that broad framework of talent management EFSA has also implemented a number of initiatives: e.g. internal mobility, talent review process, programs and projects, training (general and scientific, here we have an internal learning offer as well as external training courses for specific individual needs) and a dedicated leadership development program. The New Model Rules (in force since 2018) reinforce the merit culture in line with the Staff Regulations and EFSA's approach for the past years and promotion/ reclassification remains based on comparative assessment of the merits and subject to the availability of budgetary resources and posts under the establishment plan. In fact, the list of staff proposed for reclassification/ promotion may not exhaust the budgetary resources available for the reclassification and may consider the rates for guiding average career equivalence. According to New Model Rules: (a) EFSA shall not promote percentage higher than the maximum percentages of agents set in Annex I.B to the Staff Regulations in a given grade over a 5-year period. Annex I.B defines the maximum</p>



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
		<p>percentage of agents in a given grade that may be promoted. EFSA is under no obligation to exhaust these maximum percentages. Annex I.B is only a reference point for average promotion speeds and expectations.</p> <p>(b) the average seniority in grade of staff reclassified shall not be lower than the target figure indicated in the Annex to the New Model Rules. Nothing in the rules states that the average seniority in grade shall not be higher than the target figures mentioned in the decision.</p> <p>(c) Ultimately, EFSA keeps a closer monitoring and our promotion rate has been increasing over the last 4 years:</p> <p>-&gt; 2017  1 Official   33% of total Officials eligible with threshold  25 Temporary Agents   13.5% of total TAs eligible with threshold  14 Contract Agents   29% of total Officials eligible with threshold</p> <p>-&gt; 2018  1 Official   25% of total Officials eligible  30 Temporary Agents   11% of total TAs eligible  11 Contract Agents   12% of total Officials eligible</p> <p>-&gt; 2019  1 Official   25% of total Officials eligible  31 Temporary Agents   12% of total TAs eligible  11 Contract Agents   12% of total CAs eligible</p> <p>-&gt; 2020  1 Official   25% of total Officials eligible  34 Temporary Agents   13% of total TAs eligible  14 Contract Agents   15% of total CAs eligible</p> <p>Additionally, EFSA counts a high number of internal staff being successful in selection calls in the context of TR, thus constituting a way of recognition, since January 2020:  -28 CAs became TAs  -3 TAs moved to higher grade / FG</p>



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
33	<p>With respect to the reclassification rate for contract agents, the Commission notes a high number of years in grade of reclassified staff members in particular for contract agents FGII. The Commission recommends EFSA to follow more closely the average time in each grade as stated in the table of article 6 of the model decision for decentralised agencies and Joint undertakings laying down general implementing provisions regarding Article 87(3) of the CEOS [C(2015)9561] which shows for each grade separately the desired average reclassification period.</p>	<p>At present, for 2021, EFSA counts only 19 eligible staff in FGII category, out of which 15 have been previously reclassified, 1 is proposed for reclassification in 2021 and the remaining 3 have not succeeded in the examination of the comparative merits of the staff members eligible for reclassification merits.</p> <p>Additionally:</p> <ul style="list-style-type: none"> <li>-Over the past years EFSA has recognised merits of CAs in particular through the promotion/reclassification exercise (always equal/higher than for TAs, see information provided in reply to comment 32)</li> <li>- EFSA has increased the CAs capacity within the Establishment Plan (in sum, 21 additional CAs are granted to EFSA given the Transparency Regulation, and made available in batches from 2020 - 2022 - 4 of which are used by ECHA. On top of that, the CA envelope is increased by 15 CAs over the period 2022-2024, to support EFSA with its backlog of activities).</li> </ul>
34	<p>The Commission welcomes the good evolution with regard to women in management positions in EFSA over the period 2016 - 2020. It is noted that some discrepancy exists between the table 62 and the narrative (10 female managers out of 24 in the table whereas 11 are quoted in the text).</p>	<p>The information in the Programming Documents has been aligned.</p>
35	<p>The Commission takes note of the increasing and very high representation of staff members with Italian nationality in the Authority and would like to see a more developed action plan to address the issues with the geographical balance.</p>	<p>The increase of Italians has been stabilised in 2021, as the percentage of Italians within EFSA is slightly lower than in 2020. EFSA has also been faced with the fact that several non-Italian candidates have refused an offer in 2020. EFSA has started a specific project to tackle the issue, for which detailed information is now duly provided in the Programming Document in Annex Va. Human resources for 2022 2024 — qualitative.</p>



Comment no.	Commission's opinion on the draft EFSA Programming document 2022-2024	EFSA reply
36	<p>The Commission notes that the use of temporary-work agency workers is inconsistent with Union law if it is done to avoid the application of the Staff Regulations. Therefore, the Commission advises the authority to specify in the conditions of hiring non-statutory staff, that temporary-work agency workers should be hired only for positions that do not relate to the core business of the authority.</p>	<p>To adhere to the principle of sound financial management and comply with the Italian labour legislation Interim services are used at EFSA only when alternatives are unavailable and for a restricted number of situations and namely:</p> <ul style="list-style-type: none"> <li>a) substitution of absent staff (such as i. support to replace staff members on maternity leave; ii. support to replace staff members on sick leave preceding maternity leave or on parental leave taken immediately after maternity leave; iii. support to replace staff members on long-term leave or leave on personal ground;</li> <li>b) support in case of temporary and unplanned increase of the ordinary activity.</li> </ul> <p>In the past year EFSA had to increase the number of interim workers to cope with the increased workload stemming from the preparation of the Transparency Regulation, pending recruitment of staff as foreseen by the TR. The plan is to significantly reduce the number of interim workers from 2022 onwards.</p>
37	<p>The Commission welcomes that a detailed programme for grants and operational procurements is presented in Annex XI to the draft programming document.</p>	<p>Noted and appreciated.</p>
38	<p>This Opinion is addressed to the European Food Safety Authority. The Commission invites the Authority to amend the Single Programming Document taking into account this Opinion, and to adopt the final version of the Single Programming Document.</p>	