

# Note to the Management Board

## DRAFT PROGRAMMING DOCUMENT 2025-2028 and Expenditures 2025

### 1. Objective

The following documents are submitted to the Board:

- Final Programming Document 2025-2028, including the final annual work-programme 2025, for possible adoption,
- Statement of Revenues and Expenditures 2025 (Budget 2025),
- Draft Programming Document 2026-2028, including the draft annual work-programme 2026 for possible endorsement.

### 2. Background and Scope

In December 2023, the Board adopted the Final Programming Document 2024-2026 and the draft Programming Document 2025-2027, in compliance with the requirements of the Programming Document common template of the EU Agencies. These documents build the multiannual work programme of EFSA in line with its strategic objectives.

During 2024, EFSA prepared the “final draft Programming Document 2025-2027” and the “draft Programming Document 2026-2028”, based on the draft Programming Document 2025-2027, and following the European Commission Opinion<sup>1</sup> received in July 2024. The draft Programming Documents spanning 2025-2028 reflect the EFSA’s multiannual 2025-2028 and the annual plan 2025 and draft annual plan 2026 respectively, in the context of the EFSA Strategy 2027. A list of EFSA replies to the European Commission opinion comments is provided in the 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 the relevant Appendix B; while Appendix A and C are common)
- The financial and human resources annexes (Annex III 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, in alignment with the Programming Document and Draft EU Budget 2025, it also includes the additional funds from the legislative proposal for a Regulation of the European Parliament and of the Council on plants obtained by certain new genomic techniques and their food and feed and amending Regulation (EU) 2017/625 (“NGT”). The funds stemming from the Regulation are subject to its adoption and are indicated separately as well as the total EFSA Budget 2025 pending its approval.

As regards the Budget 2025 structure, provides here an updated proposal vs. June 2024 version: to merge of scientific meeting lines to one budget line (Generic Risk Assessment and

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(<sup>1</sup>) Commission Opinion C (2022)4654 of the 29.06.2022 on the draft Programming document 2023-2025 of the European Food Safety Authority



Risk Assessment of Regulated Products under one budget line to further lean the budget forecasting and implementation and optimise the funds on one centralised budget line; each field of risk assessment will be reported separately to enable the visibility of funds used), budget headings comments updated for the lines 3420 – External relations and 3520 - Conferences and outreach to reflect the move of representation cost.

### **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 2025-2027 will be published on EFSA's website and submitted to the EU Institutions by the end of January 2025 and become the reference for guiding EFSA's work programme implementation in 2025.
- The Draft Programming Document 2026-2028 will be further processed as follows:
  - by the end of January 2025: the document will be updated as per the actual 2024 execution data, and submitted to the EU Institutions (i.e. Commission, Parliament and Council);
  - during 2025: 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 2025;
  - by December 2025: the document will be submitted to the Board for final adoption.



## Annex 1: Commission's opinion on the draft EFSA Programming Document 2025-2027

#	Commission's opinion on the draft EFSA Programming document 2025-2027	EFSA reply (integrated in the Final Draft Programming Document 2025-2027)
<b>General comments</b>		
1	The Commission welcomes the draft programming document and appreciates that the Authority has overall addressed the comments included in the Commission Opinion of 27 June 2023 on the programming document 2024-2026	Noted and appreciated.
2	The Commission highly appreciates the Authority's contribution to the overarching objective of the Union 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 and feed safety, while addressing animal health and welfare as well as plant health within the Union.	Noted and appreciated.
3	The Commission notes that the draft programming document reflects the Union's priorities in the areas falling under the Authority's remit and the Authority's Strategy adopted in 2021, i.e. 'EFSA Strategy 2027' <sup>4</sup> , and welcomes the flexibility the Authority has demonstrated to respond to evolving requirements.	Noted and appreciated.
4	The Commission also takes note that the Authority will conduct an internal mid-term review of its Strategy in 2024, to monitor the progress made on the implementation of the Authority's strategic objectives, including an assessment of the implementation of the measures required by Regulation (EU) 2019/1381 of the European Parliament and of the Council <sup>5</sup> (the 'Transparency Regulation'). It also notes that the review will take stock of any internal or external changes that may lead to an adaptation of the Authority's Strategy 2027.	Noted and appreciated.
5	The Commission notes the commitment of the Authority to continue prioritising its support to the Union's activities on food and feed safety, addressing biological and chemical hazards, animal health and welfare, plant health, and other aspects including those relating to the area of regulated products (core risk assessment activities). The Commission appreciates that, among such activities, priority will be given to requests subject to legal deadlines and to requests for urgent action. The Commission underlines that the tasks needed to enable the Commission to fulfil its legal obligations should also take priority over other tasks. The Commission acknowledges the Authority's need to safeguard the minimum investment necessary for	EFSA is committed to continue prioritising its core risk assessment activities, including requests subject to legal deadlines and requests for urgent action. EFSA will safeguard and focus investments needed to maintain its preparedness level, improving its data connectivity, and supporting the introduction of Artificial Intelligence, as well as continuing the partnerships with Member States via the Focal Points.



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	continuous improvement and development initiatives in order to remain relevant in the medium and long term.	
6	On-going dialogue between the Authority and the Commission is essential for further aligning the Authority's support to Union policy priorities and for optimising the use of existing resources. The Commission looks forward to continuing the close dialogue with the Authority with a view to finalise the draft programming document before its submission for final approval to its Management Board.	EFSA acknowledges the importance of the on-going dialogue with the Commission with regards to the drafting and finalisation of the programming document. The exercise of sharing comments on the draft programming document is a good example of this collaboration which will ensure alignment and a successful completion of the document.
<b>Specific comments on the multiannual (2025-2027) and annual (2025) work programme</b>		
7	The Commission welcomes the Authority's commitment to support the implementation of the European Green Deal <sup>6</sup> , in particular the Farm to Fork Strategy <sup>7</sup> , the Chemicals Strategy for Sustainability <sup>8</sup> and the Biodiversity Strategy <sup>9</sup> . The Authority is invited to continue collaborating with the Commission in supporting the delivery of the relevant actions of the Union's strategies within the Authority's mandate and in synergy, where appropriate, with other agencies and national competent authorities which undertake tasks similar to those of the Authority	EFSA has built a robust strategic engagement process supporting the collaboration with the relevant ENVI Agencies, in the implementation of EU policies such as supporting the "One substance-one assessment" approach for efficiency and better regulatory predictability for chemicals, leveraging a One Health approach to utilize collective expertise and resources more effectively, and advocating for the inclusion of key regulatory topics in EU co-funded research, especially within Horizon Europe. In parallel, EFSA continues to invest on scientific cooperation with Member States through partnerships and other sourcing solutions.
8	The Commission notes the information provided in the draft programming document on the Authority's activities relating to biological and chemical hazards, animal health and welfare, plant health, human nutrition and regulated products. The Commission further notes the Authority's commitment to continue issuing yearly Union summary reports, amongst others, on zoonoses and food-borne outbreaks, antimicrobial resistance, pesticide residues, veterinary medicinal product residues and transmissible spongiform encephalopathies. The Commission takes note of the number of scientific questions per area of work planned to be closed in 2025 in the draft programming document (i.e., Appendix B).	Noted and appreciated
9	The Commission acknowledges that, although the Authority forecasts the incoming number of questions in the period 2024-2027 to remain in line with recent levels (i.e. approximately 650 questions per year), scientific complexity appears to increase. In addition, the pressure on the Authority's production capacity in certain areas, such as feed and food additives,	Noted and appreciated. EFSA continues its efforts to address the increasing pressure on its production capacity and to that end deploys its strategy in the chapter 2.3 "Strategy for increasing scientific production" in the Resources Outlook session of the Programming Document 2025-2028.



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	<p>enzymes, food contact materials and novel foods, continues to be very high despite the actions taken by the Authority since 2021<sup>10</sup>. In this context, it is also important to ensure the competitiveness of food innovation in the Union and in particular to have procedures in place that enable such innovations to reach the market within a reasonable timeframe, provided however that a high level of protection of public health and consumers' interest is ensured. The Commission welcomes the Authority's proposed approach for addressing the increased workload challenges and achieving efficiency gains as well as the several measures that the Authority intends to deploy for increasing its scientific risk assessment capacity, as set out in Section 2.2.c of the draft programming document.</p>	
10	<p>The Commission notes that, for implementing its 2027 Strategy, the Authority has designed a multiannual portfolio consisting of processes and projects and their underlying budget and resource needs. The Commission also notes that the Authority's projects will be managed under three programmes, i.e., the Data &amp; Evidence Programme (DEEP), the Innovative Risk Assessment Methodologies Programme (IRMA) and the Knowledge, Expertise and Technology Programme (NEXT), so as to improve and develop the core business along the three strategic transformation priorities respectively: (1) to improve the speed of risk assessment; (2) to increase preparedness for future risk assessment needs; and, (3) to improve digital collaboration within the Union food safety system. In this respect, the Commission acknowledges the comprehensive information provided in Appendix C to the draft programming document. The Authority is kindly invited to further specify how the relevant projects under these programmes have been/will be initiated, and how and whether their results have been or will be used in practice to support the 'Business As Usual' (BAU) activities.</p>	<p>Appendix C is updated to further specify the benefits delivered by its development activities: To better define the expected benefits of its portfolio of development activities EFSA has grouped its projects in three distinct clusters, based on the reason the activity is performed, namely:</p> <ul style="list-style-type: none"> <li>• "stay fit", projects aiming to improving the performance of the EFSA processes,</li> <li>• "stay operational", projects addressing specific situations in which EFSA is no longer able (due to obsolescence of technology, or not meeting regulation that is currently in force or no longer having the capacity/capability needed) to provide its existing catalogue of BAU services.</li> <li>• "stay relevant", activities that address the risk of "not being relevant in the future" as articulated in the relevant key action in the Strategy implementation plan.</li> </ul> <p>The expected benefits are expressed accordingly:</p> <p><u>Portfolio cluster "Stay Fit"</u>: the key driver for the definition of the activities under this portfolio cluster is a set of seven operational outcomes (Speed of Risk assessment, Timeliness of Risk Assessment, Quality of Risk Assessment, Productivity of Risk Assessment, Engagement effectiveness, Effectiveness of Crisis Response, Effectiveness of Emerging Risk Detection). The relevant operational outcomes are the expected benefits where each project contributes to.</p> <p><u>Portfolio cluster "Stay Operational"</u>: the key driver for the definition of the activities under this portfolio cluster is the systematic assessment of BAU Operations that surfaces specific situations in which EFSA is no longer able (due to obsolescence of technology,</p>



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		<p>not meeting regulation that is currently in force or no longer having the capacity/capability needed) to provide its existing catalogue of BAU services to the minimum performance expectations of its customers. The benefit delivered to BAU is the ability to address these "known issues".</p> <p><u>Portfolio cluster "Stay Relevant"</u>: the key driver for the definition of the activities under this portfolio cluster is the 2nd strategic transformation priority of EFSA "Increase Preparedness for future risk assessment needs". The benefit delivered to BAU is the ability to address the risk of "not being relevant in the future" as articulated in the relevant key action in the Strategy implementation plan.</p>
11	<p>The Commission remains concerned that the stock of questions (approximately 1500 questions spread across different areas) is roughly twice as high as the level the Authority considers 'healthy', as the Authority delivers on average between 650 and 700 questions per year. The Commission appreciates that reducing the stock to a one-year production volume remains a top priority for the Authority for the coming years and welcomes the Authority's continued close cooperation with the risk managers to ensure the allocation of resources to the areas of highest priority, and to take the necessary measures to avoid the accumulation of unsustainable workload.</p>	<p>Noted and appreciated.</p> <p>EFSA continues seeing the reduction of its stock of questions to around one-year production as a long-term priority. EFSA is continuing rolling out efficiency initiatives (such as actions stemming from the cluster of improving the speed of Risk Assessment, technological investments, outsourcing, ...) to counterbalance the increased regulatory, procedural, and scientific complexity.</p>
12	<p>The Commission supports the Authority's commitment in establishing long term scientific cooperation through partnerships with Member State competent organisations but also cooperation with other Union agencies, teaming with them in a One Health approach, and aligned with the Union strategies and policies.</p>	<p>Noted and appreciated</p>
13	<p>The Commission appreciates the Authority's continued contribution to the European Climate and Health Observatory, which helps implement Article 5 of the European Climate Law ('Adaptation to climate change') and the EU Strategy on adaptation to climate change and supports the implementation of the European Health Union.</p>	<p>Noted and appreciated</p>



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14	The Commission also notes the challenges and obstacles that the Authority has encountered in establishing partnerships with the Member State competent organisations in terms of investment effort and time needed to set up the scheme and effectively implement it. The Commission welcomes the priority given to partnerships supporting BAU work over development activities for medium- and long- term risk assessment needs, as the former might improve the speed of risk assessment.	Noted and appreciated
15	The Commission also notes that, in order to support the delivery of risk assessment, an increased budget will be available to fund national projects via grants and other financial instruments, and that scientific cooperation tools will be developed to support the outsourcing of preparatory work carried out by Member States competent organisations. In a context of limited resources, the Commission invites the Authority to place due emphasis on the selection and planning of areas of work to be outsourced through the partnerships and frameworks with the Member States, with the aim to ensure, to the extent possible, an alignment of the Member States' risk assessment plans and priorities with the Union risk assessment needs and priorities by identifying areas of common interest and by taking into account their respective technical and scientific capacity to contribute.	EFSA will continue to invest in long-term Partnerships with MS bodies and will further enhance its MS-Partnership planning and implementation mechanism. This will be done in close cooperation with EFSA's Advisory Forum. Emphasis will be given to identifying risk assessment areas of common interest, taking into account the EU and MS needs and their timelines, where appropriate MS capacities can be mobilised. This will lead to increased and more effective synergies through Partnerships on key areas, such as the risk assessment of regulated products, the development or evolution of risk assessment methodologies, etc.
16	The Commission also acknowledges the existing partnerships that have been created thus far, including the four-year (2023-2026) partnership in the area of food additives, food enzymes, food flavourings and feed additives as well as the new Focal Point operational framework implemented in 2023 to intensify cooperation between the Authority and the Member States. The Commission invites the Authority to ensure that outsourced preparatory work is performed according to the Authority's methods and quality standards.	The tender call documents for the performance of outsourced preparatory work and tasks under these partnerships set out detailed requirements in terms of compliance with the Authority's methods and quality standards. Such requirements for the performance of tasks are set out in the call and contractual documents and form part of the assessment of the deliverables before final acceptance by EFSA. A robust approach to contract management and compliance with the original specifications ensures that the Authority maintains control over the quality of the work, even when preparatory work is outsourced to another organization.
17	Regarding partnerships and synergies, the Commission supports the Authority's engagement in the "One substance, One assessment - 1S1A" approach, set out in the Chemicals Strategy for Sustainability, in particular in the context of the two Commission legislative proposals <sup>11</sup> supporting the 1S1A approach. The Commission invites the Authority to pursue further cooperation with other relevant Union agencies and risk assessment bodies on cross-cutting areas, so as to achieve synergies and efficiencies on both scientific and organisational aspects and avoid scientific divergences.	Noted and appreciated. EFSA is investing in information exchange tools (see project Digital Collaboration 2 - DiCo2 WP3) to promote joint EFSA / MSs work in areas of common interest including via Partnerships in strategic priority areas such as 1S1A.





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18	The Commission also highlights the importance of cooperation between the Union agencies in the context of One Health approach, which contributes to more integrated, cross-sectoral, and collaborative scientific assessments to better inform Union policies. In this respect, the Commission invites the Authority to indicate in its programming document how it intends to support the Commission as well as Member States for the follow-up to the Council Recommendation on stepping up Union actions to combat antimicrobial resistance in a One Health approach <sup>12</sup> , given also the Authority's participation in the inter-agency working group on antimicrobial resistance.	Via its participation in the inter-agency working group on antimicrobial resistance, EFSA supports the Commission as well as Member States for the follow-up to the Council Recommendation on stepping up EU actions to combat antimicrobial resistance in a One health approach. Among its activities in this area, EFSA continues its collaboration with ECDC to provide country support to advance One-Health responses against antimicrobial resistance (AMR) in the Western Balkans, by identifying gaps in the current national AMR strategies and action plans, and supporting the development of country roadmaps.
19	The Commission appreciates the ongoing good and constructive cooperation with the Authority in ensuring the implementation of the tasks entrusted to the Authority by means of the Transparency Regulation. The Commission acknowledges that some of the Authority's areas of work have been experiencing an additional workload following the entry into application of the Transparency Regulation, such as making the provision of pre-submission advice to the applicants more appealing and for effectively assessing a high volume of confidentiality requests made by applicants. The Commission welcomes that the Authority is closely monitoring the situation and notes that the Authority is dealing with the additional workload for confidentiality requests by using temporary workforce until the yearly volumes can be better predicted and the necessary actions to address the situation can be taken.	Noted and appreciated
20	In light of the rapid evolvement of the scientific knowledge and availability of data and the inherent challenge that such evolvement may bring about to risk assessment, the Commission welcomes the Authority's commitment on process improvement initiatives. Amongst others, the Commission notes the ongoing thorough root cause analysis of its risk assessment process to identify the relevant bottlenecks in specific workflows causing delays in risk assessment. The Commission welcomes this analysis and invites the Authority, to share its results, when available, and the possible improvements that may be required in those specific risk assessment workflows. Those inputs could be further assessed in the context of the evaluation of the Authority's performance by the Commission which kicked off earlier in 2024 and is expected to be completed by March 2026.	EFSA concluded the root cause analysis of the E2E risk assessment process and shared the relevant recommendations for further actions with SANTE at technical level. These recommendations feed already EFSA's action plan for short term and medium term actions to improve the throughput time in risk assessment. These recommendations will also feed the Authority's External Evaluation to inform further improvements envisaged for the long term. The exchanges with SANTE will continue throughout the implementation of actions for improvement.
21	The Commission welcomes that the Authority lists the guidance documents that need to be updated, and that the Authority, in close cooperation with the Commission services and the Member States, has embarked on a	Noted and appreciated





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	comprehensive analysis of the existing guidance documents to produce a multiannual plan of revision. In addition, the Commission would like to emphasise that the Authority ensures the smooth and flexible application of guidance documents to deliver fit-for purpose risk assessments.	
22	With regard to the development of scientific methodologies and tools to enhance preparedness for future risk assessment needs, the Commission acknowledges and welcomes the information on the key themes for exploration and development envisioned by the Authority. It invites the Authority to consult with the Commission on any future prioritisation of work in this area to ensure alignment with the current and future policy needs. In this respect, the Commission invites the Authority to further invest into both the 'EU Menu' project <sup>13</sup> and the Authority's data hub, with new food consumption data covering all population groups. The Commission emphasises that future mandates may require intake data and food composition data of regulated food categories	EFSA takes note to consult with DG SANTE regarding the development of new methodologies or key themes to be elaborated. This approach was already followed in activities such as SPIDO, where the EC was consulted on thematic papers. MESE to respond to other points (e.g. EU menu)
23	In the area of digital technologies, the Commission acknowledges the Authority's digital and data initiatives in the areas of collaborative data platforms, risk assessment support, new data streams, data products and services including Artificial Intelligence (AI) enabled analytics, and open-interoperable data. The Commission invites the Authority to provide a more detailed description of its work on AI enabled analytics.	EFSA together with other EU agencies and following its AI roadmap, has started to look at the implications for correct use of AI solutions with the AI Virtual Community with the agencies that moved since 2024 under the EUAN Network. Following an internal AI Task Force EFSA will continue identifying and implementing incremental actions to leverage emerging technologies effectively. Initial goals include: <ul style="list-style-type: none"> <li>• preparing EFSA for AI adoption;</li> <li>• identifying AI-driven transformative actions; and</li> <li>• guiding decision-making with a focus on ethical considerations, security, data protection and other relevant factors.</li> </ul>
24	In the area of risk communication, the Commission welcomes and supports the ongoing development of communication tools and activities by the Authority that enhance trust in Union risk assessment, including investment in communication channels and digital platforms, ranging from the evolution of the Authority's Journal (EFSA Journal) to campaigns delivered to Union citizens and crisis communication.	Noted and appreciated
25	The Commission takes note of Annex XIII to the draft programming document on the "Strategy for cooperation with third countries and/or international organisations". In this respect, the Commission welcomes the scientific cooperation with international organisations, regional partners and third countries with a view to synergise efforts, contribute to the harmonisation, or at least convergence, of risk assessment approaches at	Noted and appreciated



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	international level, improve risk assessment methodologies and joint food safety impact. The Commission acknowledges the Authority's support to the international standard setting bodies, such as the Codex Alimentarius and the International Plant Protection Convention's work and wishes to re-iterate the importance of such support to be continued. The Commission highlights especially the importance of the One Health approach and the contribution of the Authority's work in sustainability-related initiatives in order to reach the United Nations' Agenda 2030 and the Sustainable Development Goals.	
n	The Commission supports the Authority's activities to improve the quality of crisis preparedness and emerging risks identification by linking the early warning systems and data systems across the Union bodies, Union Agencies, Member States, and international organisations, such as the World Health Organization (WHO), the Food and Agriculture Organization of the United Nations (FAO) and the World Organization for Animal Health (WOAH). The Commission stresses the importance of these collaborations in strengthening the Authority's foresight capacity to detect emerging risks for food and feed safety, including those from future ocean resources, and increasing its preparedness for future risk assessment needs. The Commission also invites the Authority to further detail in its programming document how such data governance and data partnerships collaboration per specific international organisation are expected to unfold.	Noted and appreciated. Regarding foresight activities, EFSA will contribute together with DG ENV, ECHA and EEA to the set up and running of the EU Early Warning and Action System on emerging Chemicals, building on the outcome of the project "identification of emerging chemical risks in food" closed in 2024. Connections have been established with PARC and Norman Database System to analyse possible use of tools and methodologies developed by these projects. Regarding crisis preparedness EFSA continues to provide crisis preparedness training in coordination with the Commission, EU Agencies, and Member States, including IPA countries. EFSA will also prioritise multilateral and bilateral cooperation through international liaison groups, bilateral scientific exchanges with third parties and international organizations and updated or new cooperation agreements with international organisations, (e.g. an Exchange of Letters with WHO, a Memorandum of Understanding with FAO), and risk assessments bodies from third countries to address common scientific needs. EFSA's activities at international level are summarised in the Annex XIII. Strategy For Cooperation With Third Countries And/Or International Organisations.
27	The Commission would like to highlight that under Regulation (EU) 2371/2022 on serious cross-border threats to health <sup>14</sup> , a role is foreseen for the Authority to deliver risk assessments in the case of a serious cross-border threat to health that falls under its mandate. In this respect, the Commission welcomes that the Authority has included multiple references in the draft programming document concerning the Authority's role in the context of this Regulation.	Under the coordination of SANTE B2 unit, EFSA collaborates with one or several EU Agencies in the production of joint Rapid Risk Assessments (RRA), depending on the nature of the threat. BIOHAW's contribution is requested when the nature of the threat is biological, including microbiological agents causing foodborne and other zoonotic diseases (e.g. salmonellosis, listeriosis, avian influenza). BIOHAW contributes to the definition of procedures and documentation for the interagency collaboration (including the interagency Working arrangements and the template for joint RRA), actively participates in the simulation crisis exercises organised by SANTE, and takes the role of EFSA crisis coordinator for biological



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		hazards in the context of the Regulation on Serious Cross-Border Threats to Health.
28	The Commission supports the Authority's research and innovation activities in the area of the Authority's mission to support risk assessment, bridge possible gaps between research and science for regulatory purposes and ensure that the outcomes of the research programs can be used for regulatory science needs.	Noted and appreciated
29	As regards independence, the Commission notes that as of 2023 the Authority has embarked on a review process of its 2017 Independence Policy; accordingly, an external evaluation of the Authority's Independence Policy has taken place in 2023 providing insights on any weaknesses that need to be followed up and appropriate recommendations. The Commission invites the Authority to continue this process and inform of the potential enhancements that it intends to implement in light of these recommendations.	Noted and appreciated
<b>Comments on budget and human resources</b>		
30	The Commission acknowledges that the Authority's request for Union contribution corresponds to the ceiling set by the 2021-2027 Multiannual Financial Framework (MFF). Following the deduction of the 2023 budgetary outturn of 0.8 million EUR, the net Union contribution in commitment appropriations in 2025 will amount to 156.3 million EUR. This amount will be increased by 0.405 million EUR, subject to the adoption of the new legislative proposal on New Genomic Techniques. The Commission invites the Authority to update the figures in the Single Programming Document.	Noted and Financial and human resources tables are updated accordingly. The amount of 416k (405k of EU contribution increased by EFTA contribution) will be integrated into EFSA Statement of Revenues and Expenditures. EFSA understands the availability of funds will be subject to the adoption of the legislative proposal.
31	The Commission invites the Authority to update the Revenues and Expenditures appropriations tables in the Single Programming Document in accordance with the updated 2025 budget request, as approved in April 2024 by the Authority's Management Board.	Noted
32	The Commission takes note of the request for two additional temporary agents in 2025 in accordance with the Legislative Financial Statement of the proposal on New Genomic Techniques, as well as two additional contract agent ("CA") posts in-line with the Legislative Financial Statement on the One Substance One Assessment proposal.	Noted and appreciated
33	The Commission acknowledges and appreciates the continuous effort and improvements made by the Authority over the last 5-7 years on the overall percentage of reclassifications amongst the Authority's Temporary Agent	Following the observations from the European Commission, over the past few years EFSA has steadily increased the rate of promotion and reclassification of eligible staff (from 13.5% in 2020



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	<p>staff. Nevertheless, the Commission asks the Authority to further review and take appropriate measures to follow the guiding average multiplication rates of Annex IB of the Staff Regulations for the reclassification rates for the eligible TA staff. Concerning the reclassifications of contract agents, the Commission invites the Authority to ensure that the average reclassification rates foreseen in decision C(2015)9561 are appropriately applied, in particular for grades CA FG IV (15, 16) and CA FG II (6).</p>	<p>to 18.7% in 2024 resulting in 83 staff members promoted/reclassified). Nearly one in five eligible staff members were reclassified or promoted in the last exercise.</p> <p>Among EFSA's reclassified staff, the average seniority in some grade appears relatively high. This is primarily due to the presence of a few individuals who had been in their current grade for an extended period of time before being reclassified or promoted. However, because of the higher promotion/reclassification rates applied over the last few cycles, these biases on the metrics will disappear and converge to the Annex IB guiding averages.</p> <p>EFSA will continue to monitor and analyse its annual appraisal exercise to ensure that for Officials/TAs and CAs, the promotion and reclassification policies remain fair and effective in recognizing and rewarding staff achievements.</p>
34	<p>The Commission takes note of the Authority's request to keep the 4 CA posts lent to ECHA (Biocides) unoccupied also in 2025. As regards the request to have additional staff to help the Authority coping with backlogs, the Commission proposes the prolongation of the contracts of 10 CA posts for the period 2025-2027. In this context, the Commission invites the Authority to consider possible implications of the Draft Budget 2025 for the planning of future years.</p>	<p>Noted and appreciated</p>
35	<p>The Commission regrets the lack of information on planned recruitments and invites the Authority to fill in this section with the most recent data on recruitment forecasts by type of post and grade.</p>	<p>As per EC template the Recruitment Plan is to be provided with regards to year N+1 only and not N+2. EFSA provides as per template the Multiannual Staff Policy Plan For the year N+2 – N+4 with the most updated information available at the time of the drafting of the Programming Document and in view of the approval of the budget N+2.</p>
36	<p>The Commission invites the Authority to adjust its establishment plan in the programming document in line with the Draft Budget 2025.</p>	<p>The Establishment Plan 2025 reported in the table reflects what published in the 2025 Draft budget, though the nr of CA FTE has been adapted according to EC indications (-5 short-term CA from the 15 FTE batch, -1 CA FTE initially requested for cybersecurity but not granted)</p>
37	<p>As regards the Authority's request for an additional CA to strengthen to strengthen its cybersecurity services, the Commission encourages the Authority, in line with its strategy for efficiency gains, to look for synergies with a view to sharing resources with other Union agencies.</p>	<p>Comment acknowledged</p>



#	Commission's opinion on the draft EFSA Programming document 2025-2027	EFSA reply (integrated in the Final Draft Programming Document 2025-2027)
38	The Commission invites the Authority to pay particular attention to gender balance in senior and middle management positions, in line with the Commission commitment in the Gender Equality Strategy 2020- 2025 and take proactive actions to increase the share of female managers in Union agencies and other bodies, such as to draw an appropriate gender action plan to identify, support and develop internal female talent.	EFSA has implemented measures to increase female representation in senior management, including: Branding, dissemination, Diversity & Inclusion initiatives (e.g. gender neutral job descriptions, attention to gender balanced selection panels ; increased communication and awareness to promote a more inclusive workplace. As of 1 August 2024, the share of women at the level of senior management was 40%, and 41% at senior and middle level management combined. Including Team Leader positions, the gender balance is 53% women and 47% men.
39	The Commission invites the Authority to take appropriate measures to withhold the increasing figures in the most represented nationality amongst the Authority's staff (IT) and report progress in a next Single Programming Document.	Pursuing a more balanced representation of nationalities remains EFSA's ambition and priority. This ambition is hampered by a number of different elements such as geographical location (remote from main international connections), poor labor market for spouses, recurrent issues with the local "Scuola per l'Europa", high cost of living and availability of rental accommodations, limited access to remote working. Furthermore, the continuous deterioration in Italy's salary correction coefficient has further limited our ability to offer competitive conditions. Nevertheless, a number of initiatives have been launched to increase attractiveness and improve the nationality balance such as a revamp of a comprehensive employer branding strategy, social media promotions - more targeted in specific under-represented countries - participation/organization of career events in all EU Member States and reinforced collaboration with Focal Point Network representing national food safety authorities. We are also investing on creating more diverse pipelines, for example with our successful traineeship programme.
40	This opinion is addressed to the Authority. The Commission invites the Authority to amend the draft programming document 2025-2027 taking into account this opinion, and to adopt the final version.	EFSA is actively engaging with other EU Agencies and institutions on best practices to attract candidates from different EU Member States. EFSA is currently working on a EUAN joint procedure to support active and passive candidate search and is also closely cooperating with EPSO and its careers ambassadors to enhance the Agency visibility in underrepresented Member States.