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REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL

on the implementation and impact of Regulation (EU) 2017/1939 on the European Public Prosecutor's Office

{SWD(2026) 278 final}

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1. Introduction

In 2017, the Council adopted Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office (the EPPO) ('the EPPO Regulation')[1], which entered into force on 20 November 2017. During the evaluation period, three EU Member States did not participate in the EPPO (Denmark, Hungary and Ireland). However, on 29 May 2026, Hungary notified the Commission of its intention to join the EPPO. The Commission adopted its Decision confirming Hungary's participation in the EPPO on 10 July 2026, which entered into force on 2 August 2026[2].

The EPPO is the public prosecution office of the EU, responsible for investigating, prosecuting and bringing to judgement perpetrators of crimes affecting the EU's financial interests provided for in Directive (EU) 2017/1371 ('the PIF Directive')[3] and determined by the EPPO Regulation ('PIF crimes'). The PIF Directive lays down a definition of – and penalties for – the following criminal offences, to the extent that they damage or are likely to damage the EU's financial interests: (i) fraud, including cross-border VAT fraud involving a total damage of at least EUR 10 million; (ii) corruption[4]; (iii) misappropriation; and (iv) money laundering. It also includes provisions on ancillary offences. Additionally, the EPPO is responsible for investigating and prosecuting: (i) offences involving participation in a criminal organisation, if the focus of the criminal organisation is to commit PIF crimes; and (ii) offences inextricably linked to PIF crimes[5].

The EPPO, which is independent and acts in the interest of the EU as a whole, began operations on 1 June 2021. The EPPO is a key component of the EU's anti-fraud architecture (AFA), which has evolved over time with a set of policies, bodies and mechanisms. These policies, bodies and mechanisms that make up the AFA include: (i) the European Anti-Fraud Office (OLAF); (ii) the European Union Agency for Criminal Justice Cooperation (Eurojust); (iii) the European Union Agency for Law Enforcement Cooperation (Europol); (iv) the Authority for Anti-Money Laundering and Countering the Financing of Terrorism; and (v) new and upcoming actors, such as the European Union Customs Authority. With its White Paper of July 2025, the Commission launched a reflection on how the EU's AFA can be strengthened and modernised to provide better protection for the EU's financial interests[6].

The creation of the EPPO aimed to improve the protection of the EU budget as well as address long-standing shortcomings in the AFA, especially in investigations and prosecutions of PIF crimes. Prior to the creation of the EPPO, national authorities were the only ones responsible for investigating and prosecuting PIF crimes, and they faced significant limitations, especially in cross-border cases. This fragmentation created substantial challenges in addressing complex

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[1] OJ L 283, 31.10.2017, pp. 1-71, ELI: http://data.europa.eu/eli/reg/2017/1939/oj.

[2] Commission Decision (EU) 2026/1701, OJ L, 2026/1701, 13.7.2026, ELI: http://data.europa.eu/eli/dec/2026/1701/oj. With the entry into force of this Decision, the EPPO Regulation has ceased to be an act adopted within the framework of enhanced cooperation and has become automatically an ordinary act of Union law, to be regarded as part of the *acquis* which has to be accepted by candidate States for accession to the EU.

[3] OJ L 198, 28.7.2017, pp. 29-41, ELI: http://data.europa.eu/eli/dir/2017/1371/oj. PIF stands for '*protection des intérêts financiers*' (protection of the financial interests).

[4] With the entry into force of Directive (EU) 2026/1021 on combating corruption (OJ L, 2026/1021, 11.5.2026, ELI: http://data.europa.eu/eli/dir/2026/1021/oj), references to 'corruption' in the PIF Directive have been replaced with 'bribery'.

[5] The EPPO can exercise its competence over criminal offences inextricably linked to PIF crimes only when the conditions set out in Article 25(3) of the Regulation are met (see below, fn 16). Unless otherwise specified, the Articles and Chapters mentioned in this report refer to Articles and Chapters of the EPPO Regulation.

[6] White Paper for the Anti-fraud Architecture Review, COM(2025) 546 final, 16.7.2025. The results of the AFA review will be presented in a Commission Communication planned for the end of 2026.

fraud cases, including large-scale cross-border VAT fraud. National authorities often lacked the necessary tools, resources and/or expertise to act swiftly and effectively across jurisdictions, leading to gaps in enforcement and accountability.

At the same time, due to limitations in their mandates, the existing EU bodies and agencies had limited means to ensure the effective protection to the EU's financial interests. Eurojust and Europol were limited to giving support to – and coordinating the work of – national judicial and law enforcement authorities. Similarly, OLAF, as a body tasked with carrying out administrative investigations, relied and continues to rely on the national authorities for any judicial follow-up. The insufficient recovery of proceeds of PIF crimes and the insufficient return of these proceeds to the EU budget were additional problems, as they are still today. The impact assessment accompanying the Commission proposal for an EPPO Regulation estimated that less than 10% of the total amount of fraud was ever recovered[7]. The level of deterrence was also low.

The EPPO was therefore expected to address the need to: (i) better prevent PIF crimes; (ii) ensure the common investigation and enforcement for such offences; and (iii) put in place a common European prosecution policy for these crimes. To address these needs, the EPPO Regulation set the **general objective** of contributing to the strengthening of the protection of the EU's financial interests through the following four specific objectives:

- to investigate, prosecute, and bring to judgment perpetrators of, and accomplices to, PIF crimes in national cases;
- to enable more effective investigations and prosecutions of cross-border PIF crimes by establishing a common EU investigation and prosecution zone and allowing for more effective investigations and prosecutions in cross-border cases;
- to ensure consistency and fairness across Member States by establishing common rules and procedures for the investigation and prosecution of PIF crimes;
- to ensure the independence and accountability of prosecutions for PIF crimes and gain/foster public trust in such prosecutions.

2. Purpose and scope of the evaluation

The purpose and scope of the present evaluation are regulated by Article 119(1) of the EPPO Regulation. The evaluation serves four main objectives. Firstly, it examines whether the EPPO Regulation has been completely and correctly implemented. Secondly, it assesses the EPPO's governance and use of resources, including significant obstacles to its activities and possible areas for simplification and reduction of administrative burden. Thirdly, it assesses the EPPO's performance and its working practices in relation to its objectives and tasks (as well as the overall impact of the EPPO on the problems it was meant to address) against the Better Regulation criteria of effectiveness, efficiency, relevance, coherence and EU added value. Fourthly, it identifies lessons learnt and points to areas for improvement.

The evaluation covers the period from the EPPO Regulation's entry into force on 20 November 2017 until the end of June 2025, while taking account, where relevant, of developments until 13 July 2026. It covers the 24 EU Member States participating in the enhanced cooperation on the establishment of the EPPO ('Member States') during the evaluation period and, where relevant, the non-participating Member States. The evaluation also considers the EPPO's

[7] SWD(2013) 274 final (the 'impact assessment'), 17.7.2013, p. 24. The impact assessment is available here: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=swd:SWD_2013_0274.

cooperation with relevant EU institutions, bodies, offices and agencies (IBOAs) as well as international organisations and non-EU countries, including enlargement partners.

This is the first evaluation of the EPPO Regulation. Its baseline is therefore the situation before the EPPO was created, where national authorities were responsible for investigating and prosecuting PIF crimes. The data presented in the 2013 impact assessment refer to the situation in 2011, approximately one decade before the EPPO started its operations, and are overall quite limited. The impact assessment provided some data on the extent to which Member States followed up on cases transferred to national judicial authorities by OLAF. It reported that, by the end of 2011, national judicial authorities had decided on 471 out of a total of 1 030 actions transferred to them by OLAF in the period between 2006 and 2011. Out of these 471 decisions, 199 had resulted in a conviction by a criminal court[8].

The total annual financial impact of irregularities identified as 'suspected fraud' by OLAF in 2011 was estimated at EUR 404 million (EUR 295 million for expenditure and EUR 109 million for revenues)[9]. However, the 2013 impact assessment noted that this amount is seriously underestimated, as it is dependent on Member States' willingness and capability to detect and record crime and also to report it to the competent EU bodies[10].

3. Key findings

3.1. Effectiveness

The evaluation finds that the **EPPO Regulation has been effective in establishing and operationalising a new, well-functioning EU-level investigative and prosecutorial framework for PIF offences**, and in generating early operational results consistent with its objectives. Since becoming operational in 2021, the EPPO has steadily increased its activities. This is reflected in part by the significant increase in: (i) investigations opened (576 in 2021 and 2 030 in 2025); (ii) freezing orders granted by national authorities upon its request (EUR 147.3 million in 2021 and EUR 1.13 billion in 2025); (iii) indictments issued (5 in 2021 and 275 in 2025); and (iv) convictions obtained (1 in 2021 and 159 in 2025)[11].

Although the lack of structured pre-EPPO data makes comparison difficult, the available evidence supports the conclusion that the EPPO has addressed the fragmentation of national enforcement and strengthened the handling of cases, including in particular cross-border cases.

The EPPO Regulation and the EPPO itself have made a substantial contribution to the intended objectives by creating an operational framework that enables independent investigations and prosecutions to be pursued under a common EU mandate, while mainly relying on decentralised delivery through national systems. The evidence indicates the EPPO's increasing operational activity and capacity to handle complex cases, and in particular cross-border cases where the EPPO's effectiveness and EU added value are even higher. The EPPO has indeed moved beyond traditional judicial cooperation mechanisms by **putting in place an integrated EU-wide investigation and prosecution framework for PIF offences**. Under the previous system, cross-border evidence gathering relied heavily on mutual legal assistance procedures, which were often time-consuming. Under the EPPO framework, European Delegated Prosecutors (EDPs) may directly assign investigative measures to EDPs in other participating Member States, substantially streamlining cross-border investigations. In 2025 alone, EDPs issued 1 524 such requests.

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[8] Ibid. p. 15.
[9] Ibid. pp. 75-76.
[10] Ibid. p. 91.
[11] Data for 2021 refer to seven months of activity only (1 June-31 December).

A further key achievement lies in the successful implementation of the EPPO's hybrid institutional model, **combining a central office with EDPs embedded and operating in national systems**. This structure has allowed the EPPO to have better visibility, compared to national authorities, over complex cases and coordination across jurisdictions, enabling a more consistent approach to investigations and prosecutions. The EPPO's centralised overview of investigations, coupled with EDPs on the ground, is a significant operational advantage. It enables the EPPO to identify links between cases that might otherwise remain undetected by national authorities, as shown in flagship EPPO cases such as Admiral, Calypso and Midas. For example, in 2024, the EPPO organised 41 multi-site action days. Action days have proven to be an effective operational tool as they involve simultaneous searches, arrests and asset seizures across several jurisdictions. Governance arrangements, including the role of the EPPO's Permanent Chambers and the EPPO College, have contributed to strategic direction and oversight, although the evidence base on the internal functioning of the EPPO remains limited[12].

Furthermore, the EPPO's cooperation with national authorities, EU institutions, and external partners has also developed positively, allowing access to information and operational support. However, challenges remain, as explained in more detail in Section 3.3 below.

The evaluation finds that the EPPO Regulation's specific objective of **ensuring consistency and fairness across Member States** by establishing common rules and procedures for the investigation and prosecution of PIF crimes is yet to be fully achieved. The EPPO College has adopted internal rules and guidelines to ensure a uniform operational framework, and the Permanent Chambers ensure consistency in EPPO cases. However, consistency depends to a large extent on the implementation of the Regulation by Member States. The evaluation notes some areas where uneven implementation has prevented the EPPO from fully exercising its investigative powers.

Qualitative evidence shows that the establishment of the EPPO has led to greater public trust, with several stakeholders emphasising the importance of a truly independent, EU-level public prosecutor's office in charge of combating PIF crimes.

In short, and despite some limitations linked to the uneven implementation of the EPPO Regulation, the EPPO's activities have effectively addressed key weaknesses identified at the time of the baseline assessment, in particular: (i) the fragmentation of enforcement; (ii) uneven prioritisation of PIF offences; and (iii) practical barriers to pursuing complex cross-border cases through purely national mechanisms.

As regards the broader impact of the EPPO's activities, including final judicial outcomes, financial recovery achieved through final decisions, and longer-term impacts such as deterrence, decisive evidence that would allow to measure it is only partly available. This is due to several factors. Firstly, the data collected by the EPPO concern investigative and prosecutorial activities rather than the broader impacts of these activities. Secondly, criminal proceedings can only be regarded as finalised once all available remedies have been exhausted, a process that often takes several years. Thirdly, Member States are under no obligation to report to the EPPO information such as the number of convictions, acquittals or amounts recovered. Finally, even where such data are available, they reflect only the EPPO's direct impact on the cases it has handled and do not measure broader effects, such as increased deterrence or improved protection of the EU's financial interests.

[12] The study team that conducted the external support study faced challenges in obtaining the required level of breadth and balance of primary evidence, as it was not granted direct access to the EDPs.

3.2. Efficiency

The evaluation finds that **the EPPO has generally used its allocated resources efficiently** to attain its objectives, in a context where the **extent of its operational activity far exceeded expectations**. The revised Legislative Financial Statement (LFS)[13] anticipated that the EPPO would handle around 970 active cases annually from 2023 onwards. In practice, the EPPO already handled 515 active cases during its first seven months of operations in 2021, increasing to 3 602 active cases by the end of 2025. The EPPO's budget and staff also increased considerably during the evaluation period to cater for the increased workload, including in light of the EPPO's mandatory prosecution obligations[14] and the growing number of crime reports

Over the evaluation period, the EPPO demonstrated strong organisational and financial management capacity, including high budget execution rates and prioritisation of operational work, delivering considerable operational efficiency compared with the pre-EPPO situation. The evaluation finds that the EPPO's structure and operational model has generated substantial efficiencies, especially in complex cross-border investigations. The EPPO has improved coordination across jurisdictions, accelerated investigations and prosecutions, and strengthened the EU's ability to detect and investigate cross-border fraud, especially VAT fraud schemes.

The evaluation finds that the overall benefits of the EPPO could significantly outweigh the costs related to its establishment and functioning. This is especially true when bearing in mind the 'knock on' effects following from the EPPO's operations, such as improvements to deterrence and greater protection of the EU budget. The EPPO has delivered significant operational efficiencies compared with the pre-EPPO situation, particularly in complex cross-border cases. The creation of the EPPO has allowed to better detect fraud and enabled significant levels of cross-border cooperation that are reportedly much quicker than the pre-EPPO situation. Furthermore, the operational structure put in place by the Regulation works well, making it easier to: (i) mobilise resources and expertise; (ii) coordinate investigations; and (iii) streamline prosecutions across multiple jurisdictions. This all helps to make investigations more efficient.

At the same time, the evaluation identifies some areas where further efficiency gains are possible, such as in the work of the EPPO's Permanent Chambers, which are a useful forum for supervision and direction of EPPO cases, in particular in complex cross-border cases. The evaluation also identifies shortcomings in the EPPO's digital infrastructure, particularly its Case Management System (CMS).

Further efficiency gains also depend on the Member States. For instance, the EPPO's investigations rely on law enforcement resources at the national level. The evaluation finds that the support given to the EPPO is uneven across Member States, with the levels of staffing of national law enforcement bodies supporting the EPPO varying from one Member State to the other. In some instances, Member States set up dedicated police forces to support the EPPO, which the EPPO welcomed. In other Member States, the EPPO liaises with different authorities, according to the specific circumstances of each case.

Other challenges in the EPPO's work that impact its efficiency derive from the **inadequate implementation of the EPPO Regulation in the Member States**. The assessment of the conformity of national legislation with the EPPO Regulation identified a set of recurring issues

[13] The LFS accompanying the 2013 Commission proposal was revised in June 2017. Further references are thus made to the 'revised LFS', which is available here: https://www.eppo.europa.eu/sites/default/files/2025-08/Commission_Revised_LFS_EPPO_2017.pdf.

[14] Whenever there are reasonable grounds to believe that a PIF offence is being – or has been – committed, the EPPO 'shall' initiate an investigation (Article 26(1)), with only a few exceptions (see Article 25(2)).

in the implementation of the Regulation across Member States[15], such as national legislation not allowing direct reporting from national competent authorities to the EPPO. This may reduce the number of relevant reports sent to the EPPO in a timely manner and potentially delay the opening of cases.

3.3. Coherence

The evaluation concludes that **the EPPO Regulation and its implementation have proven to be coherent overall**, both internally and externally, despite some gaps, inconsistencies and/or ambiguities.

The internal assessment shows that, although the Regulation is consistent in its overarching design and objectives, some specific issues have been identified, in particular in the following three areas: (i) the difficulty in calculating, especially at the early stages of an investigation, the threshold of EUR 10 million of total damage resulting from cross-border VAT fraud, which needs to be met for the EPPO to exercise its competence; (ii) the notion of the 'focus' of activity of criminal organisations, as the EPPO can investigate and prosecute organised crime cases only if the focus of an organised crime group is to commit PIF crimes; and (iii) the complex rules governing the EPPO's exercise of competence over inextricably linked offences[16].

Stakeholders also identified structural tensions in the EPPO's data protection regime under Chapter VIII of the Regulation, which does not always clearly delineate the scope of its data protection provisions vis-à-vis national law. This means that it is not always clear where the Regulation ends and where national law begins, nor how the two should interact in practice.

On external coherence, the evaluation finds that the EPPO Regulation is broadly consistent with the relevant EU, national, and international interventions. This is despite some limitations in cooperation with non-EU countries, which do not always recognise the EPPO as a competent authority for the purpose of judicial cooperation. One of the areas examined by the external coherence assessment is the EPPO Regulation's coherence with the EU Charter of Fundamental Rights, the European Convention on Human Rights, the procedural rights Directives, and the case law of the Court of Justice of the EU and European Court of Human Rights. No major structural non-compliance issues were identified. However, the evaluation notes that differences in national procedural safeguards and shortcomings in the transposition of the procedural rights Directives affect the uniformity of defence rights in EPPO proceedings, particularly on legal aid, access to case files, translation practices, and standards of pre-trial detention.

Furthermore, the evaluation notes that the EPPO's mandate is generally consistent with the mandates of OLAF, Europol, Eurojust and other relevant EU bodies. Overall, cooperation frameworks broadly function well, although challenges remain, particularly concerning information sharing, hit/no-hit systems and the risk of parallel investigations, which are issues under reflection for the upcoming AFA review[17].

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[15] For the detailed assessment of the conformity of national legislation with the EPPO Regulation, see Annexes 6 and 7 to the study supporting the evaluation, ISBN 978-92-68-42141-3, available here: https://commission.europa.eu/law/cross-border-cases/judicial-cooperation/networks-and-bodies-supporting-judicial-cooperation/european-public-prosecutors-office-eppo_en.

[16] When PIF crimes are inextricably linked to non-PIF crimes (e.g. forgery of documents), the EPPO, pursuant to Article 25(3), cannot exercise its competence if: (a) the maximum sanction provided for by national law for the PIF offence is equal to or less severe than the maximum sanction for the inextricably linked offence, unless the latter offence has been instrumental to commit the PIF offence; or (b) there is a reason to assume that the damage (likely to be) caused to the EU's financial interests by the PIF offence does not exceed the damage (likely to be) caused to another victim.

[17] White Paper for the Anti-fraud Architecture Review, pp. 8-12.

Cooperation with Eurojust

Eurojust supports and works with national prosecutorial and judicial authorities to combat a wide range of serious and complex cross-border crimes, including PIF crimes. The EPPO and Eurojust signed a Working Arrangement in February 2021[18] and allowed each other indirect access to information in their respective CMSs based on a hit/no-hit system. However, the evaluation highlights that the system is not automated and that exchange of data could be optimised[19].

Cooperation between the EPPO and Eurojust mostly takes place via meetings between the European Chief Prosecutor and the Eurojust President and between the respective liaison teams, where possibilities to strengthen institutional cooperation and coordination are discussed. The EPPO is also supported by national desks at Eurojust.

This evaluation, as well as the recent evaluation of Eurojust[20], suggests that both: (i) overall operational cooperation between the EPPO and Eurojust is strong and consistent (although the two bodies have so far cooperated in only a limited number of cases[21]); and (ii) there is room for further improvement, for instance with regard to the hit/no-hit mechanism.

Cooperation with OLAF

Both the EPPO and OLAF have been tasked with protecting the EU's financial interests by investigating conduct affecting these interests. OLAF's core mission is to carry out administrative investigations for the purpose of fighting fraud, corruption and any other illegal activity affecting the EU's interests as well as into serious misconduct by EU staff and members of the EU institutions, while the EPPO is responsible for investigating, prosecuting and bringing to judgment PIF crimes.

In accordance with Article 101 of the EPPO Regulation, the relationship between the EPPO and OLAF should aim in particular to ensure that all available means are used to protect the EU's financial interests through complementarity and support by OLAF to the EPPO, based on the principle of non-duplication save in specific circumstances determined in the relevant legal instruments in which both bodies can investigate the same facts. When OLAF conducts complementary investigations, the EPPO and OLAF can investigate the same facts simultaneously from two different viewpoints, based on the principle of non-duplication[22], with the aim for OLAF to collect information relevant for either: (i) the adoption of precautionary measures; or (ii) the conduct of financial, disciplinary or administrative action. . Furthermore, in some cases the EPPO has requested support from OLAF during its own investigations. As OLAF stakeholders have reported, such support from OLAF is particularly valuable in complex financial or structural projects, where OLAF's administrative expertise is essential. Between 2021 and 2024, OLAF conducted complementary administrative investigations in 84 cases, and

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[18] This and all other Working Arrangements and Agreements mentioned in this report are available on the EPPO's website (https://www.eppo.europa.eu/documents_en).

[19] The EPPO submitted eight names for cross-checking to Eurojust in 2024, while Eurojust has not sent any request to the EPPO in the same timeframe.

[20] Evaluation of the European Union Agency for Criminal Justice Cooperation, SWD(2025) 182 final.

[21] In 2022, Eurojust supported 14 cases involving the EPPO, 26 cases in 2023, and 25 cases in 2024. The two bodies have implemented agreements on the workflow of the EPPO cases to be handled by Eurojust and the EPPO's participation in joint investigation teams supported by Eurojust.

[22] OJ L 248, 18.9.2013, pp. 1-22, ELI: http://data.europa.eu/eli/reg/2013/883/oj, as amended by Regulation (EU, Euratom) 2016/2030 OJ L 317, 23.11.2016, pp. 1-3, ELI: http://data.europa.eu/eli/reg/2016/2030/oj and Regulation (EU, Euratom) 2020/2223, OJ L 437, 28.12.2020, pp. 49-73, ELI: http://data.europa.eu/eli/reg/2020/2223/oj.

carried out support activities in 22 cases. This represents a small proportion of the total number of investigations opened by both the EPPO and OLAF[23].

Cooperation between the EPPO and OLAF, which is also regulated in the Working Arrangement signed in July 2021, requires the two bodies to exchange information, including through the hit/no-hit system, which is currently suboptimal as it is not automated.

Although the mandates of the EPPO and OLAF are distinct[24], this evaluation finds that the overall legal framework for cooperation between the two offices remains complex. National authorities are obliged to report to the EPPO any criminal conduct in respect of which the EPPO can exercise its competence. EU IBOAs are obliged to report to both the EPPO and OLAF. National authorities may also voluntarily report to OLAF, and private parties may report to the EPPO and/or OLAF. This can create an administrative burden for the EPPO and OLAF because, in many cases, both offices have to assess the input received, which may result in duplications of reporting and investigations.

Where OLAF identifies suspicions of criminal offences, it is required to submit an EPPO Crime Report (ECR) to the EPPO. OLAF is the largest source of case referrals to the EPPO among the EU IBOAs, and its role is therefore central to ensuring effective reporting to the EPPO, whether by sending ECRs or by assessing and referring reports emanating from other IBOAs to the EPPO[25]. However, as the EPPO receives more reports from other sources, such as national authorities and private sectors, the EPPO considers the number of ECRs sent by OLAF (as well as other IBOAs) not sufficient.

In accordance with Article 101(4) of the EPPO Regulation, the EPPO 'may' provide information to OLAF if it decides not to conduct an investigation or has dismissed a case. The European Court of Auditors' Special Report 26/2025 found that such reporting from the EPPO to OLAF is limited and this may reduce the potential for administrative follow-up[26].

Cooperation with Europol

Europol supports law enforcement authorities in preventing and combating serious crime, including PIF crimes, and terrorism. In January 2021, the EPPO and Europol concluded a Working Arrangement, which was followed by an arrangement on the exchange and protection of classified information, and a Memorandum of Understanding on secure communication (both signed in November 2021).

Overall, the evaluation concludes that the cooperation between Europol and the EPPO is good and clearly defined, with the mandates of both bodies being respected and the provisions of the Working Arrangement well implemented[27].

The EPPO and Europol have set up the EPPO-Europol Steering Committee, which meets once or twice a year and decides on strategic priorities. The EPPO has indirect access to Europol data

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[23] For example, in 2024, the EPPO opened 1 504 investigations, compared with 5 support activities and 21 complementary investigations performed by OLAF in the same year.

[24] The European Court of Auditors (ECA) reached the same conclusion in its special report 26/2025, 'EU bodies fighting fraud – Clear mandates but exchange of information and Commission oversight remain insufficient' ('the ECA Special Report 26/2025'). The report is available here: https://www.eca.europa.eu/en/publications?ref=SR-2025-26.

[25] Recital 51 of the EPPO Regulation provides that, to comply with the obligation to inform the EPPO where a suspicion of a PIF offence is identified, EU IBOAs should have in place efficient mechanisms for a preliminary evaluation of allegations reported to them and may make use of OLAF to that end.

[26] The ECA Special Report 26/2025, pp. 27-28.

[27] Between 2022 and 2024, the number of requests for which Europol provided support to the EPPO grew from 28 to 83 (158 in total in the whole period). On the other hand, Europol submitted a total of 12 ECRs over the same period.

in relation to offences within its mandate through a hit/no-hit system, which the evaluation finds neither up to date nor efficient. As a follow-up to searches and hits found, Europol shares data via its Secure Information Exchange Network Application (SIENA), which the EPPO joined in 2022. SIENA is designed to enable the exchange of operational and strategic crime-related information and intelligence between Member States, Europol and its partners.

Stakeholders noted that the ownership of Europol data rests with the Member States. This can result in delayed access for the EPPO, as Europol must seek Member States' consent before sharing these data. Europol stakeholders stressed the fact that any data the EPPO receives and that are not relevant to it, but could be useful to Europol, should be shared with Europol.

Cooperation with the European Commission

In 2021, the EPPO and the Commission signed a Cooperation Agreement, which was revised in 2024. The main purpose of the revision was to improve the EPPO's notifications to the Commission, so as to enable the Commission to take precautionary and corrective measures. As part of the amendments, the EPPO was also granted direct access to several databases, and new notification templates were introduced, as well as the 'EPPO box', which is a dedicated and secure tool to exchange case-related information.

Stakeholders' feedback on those amendments is generally positive, as they allow for more direct exchanges of information between the relevant Commission services and the EPPO, instead of communicating via OLAF. In 2025, the EPPO notified indictments and simplified prosecution procedures to the Commission amounting to: (i) EUR 171.3 million of estimated damage related to expenditure fraud; and (ii) EUR 1.19 billion of estimated damage related to revenue fraud. However, it was not possible to establish the precise number of notifications received by the Commission. There is an ongoing process to both refine the notification procedures and improve the effectiveness of the EPPO's notifications for the purpose of the Commission's follow-up.

Overall, the Directorates-General (DGs) of the Commission responsible for the management of EU funds have referred to the EPPO as a 'game changer' for its ability to connect cross-border fraud patterns that were difficult to address using purely national approaches. Some DGs noted the EPPO's reluctance to share information with the Commission due to confidentiality issues related to ongoing criminal investigations, although they also reported that steps had been taken over the evaluation period to improve information exchange.

Cooperation with non-participating Member States and non-EU countries

The evaluation reports that the EPPO is committed to ensuring strong cooperation with non-participating Member States and non-EU countries, which is crucial for investigating and prosecuting cross-border cases and recovering assets.

The number of non-participating Member States has reduced over the evaluation period as Poland and Sweden joined the EPPO in 2024. Hungary joined the EPPO in 2026. The EPPO signed a Working Arrangement with the Office of the Prosecutor General of Hungary in 2021 and the Danish Ministry of Justice in 2023. In 2023, cooperation formally started with Ireland, although no Working Arrangement has been signed so far. In 2025, Denmark was involved in 14 EPPO cases, Ireland in 18, and Hungary in 175. Overall, the evaluation concludes that cooperation with the competent authorities of the non-participating Member States works well, although stakeholders indicated some gaps in communication and the exchange of information channels.

Cooperation with the competent authorities of non-EU countries also improved during the evaluation period. By the end of 2025, the EPPO had signed Working Arrangements with public prosecutors' offices in 17 non-EU countries (of which seven are EU candidate countries) and with anti-corruption structures in four non-EU countries, as well as three Memoranda of Understanding. The number of active EPPO cases linked to non-EU countries has significantly increased since the EPPO's establishment in 2021. By the end of 2022, non-EU countries were involved in 61 EPPO cases; by the end of 2025, this number rose to 193.

The evaluation finds that, in some instances, the EPPO faced challenges in being recognised by non-EU countries as a competent authority for the purpose of judicial cooperation in criminal matters. In the absence of EU-level agreements on cooperation between the EPPO and the authorities of non-EU countries, the EPPO relies on the existing international agreements on mutual legal assistance to which the EU and/or the Member States are parties. However, such agreements regulate cooperation among the competent authorities of states, and do not cover cooperation with an EU body such as the EPPO. Some non-EU countries were thus not always able to recognise the EPPO as a competent authority in the same way they would have recognised a national prosecutor's office.

3.4. Added value

The evaluation concludes that the EPPO provides **significant EU added value** compared to what Member States could have achieved acting alone, while acknowledging that the absence of precise data on the extent to which PIF crimes were investigated and prosecuted before the EPPO means it is not possible to exactly quantify benefits and outcomes. However, the EPPO's effectiveness in strengthening the protection of the EU budget already demonstrates its added value. The EPPO's hybrid structure, combining a central office with EDPs in the Member States, enables operational action across borders while preserving national legal expertise.

Before the EPPO, national authorities and existing EU bodies faced structural limitations in investigating and prosecuting complex cross-border fraud, particularly large-scale VAT fraud and organised criminal activity. Stakeholders emphasised the 'helicopter view' available to the EPPO that enables it to identify the broader criminal networks behind such offences. The EPPO's integrated structure now makes it possible for connections between cases, people and companies to be identified across jurisdictions in a manner that was previously not possible.

The EPPO has **significantly improved the speed and effectiveness of cross-border investigations**. The system whereby EDPs directly assign investigative measures to one another has proven substantially faster and more efficient than the traditional mutual legal assistance or mutual recognition mechanisms. The evaluation notes that operational tools such as coordinated action days created major added value: (i) enabling simultaneous searches, arrests and the freezing of assets across several Member States; and (ii) reducing the risks of evidence destruction, dissipation of assets or suspects fleeing. Therefore, the EPPO now enables a more effective investigation and prosecution of complex cases involving the financial interests of the Union compared to what Member States could previously achieve on their own.

Furthermore, the evaluation finds that national judicial authorities have also benefited from the EPPO's establishment and dedicated training initiatives, such as the EPPO Academy.

3.5. Relevance

The evaluation shows that the EPPO has **largely adapted to evolving needs, thus remaining relevant in a changing environment**, although some shortcomings remain. As expected, over time the EPPO has established an effective EU-level investigative and prosecutorial system capable of handling complex cross-border cases, particularly large-scale VAT fraud cases, while addressing long-standing problems of fragmented national enforcement, weak ownership of cases, and jurisdictional conflicts. The need for a centralised EU prosecutorial structure has become even more pronounced due to the growing scale, sophistication and digitalisation of organised financial crime. EPPO caseloads, investigations and trials have increased substantially since the EPPO's foundation, demonstrating both the demand for and the operational relevance of the Office. Complex cross-border fraud schemes (such as carousel VAT fraud, e-commerce fraud and the use of shell companies) and the involvement of cross-border organised crime groups increasingly require coordinated EU-level investigations, specialised expertise and central steering mechanisms that national authorities alone cannot provide.

However, the EPPO's effectiveness and added value depend heavily on consistent support from Member States. It also depends on the correct implementation of the Regulation by Member States and, as appropriate, all IBOAs, as well as cooperation with other IBOAs, non-participating Member States and non-EU countries. In other words, the evaluation finds that the EPPO is not able to respond to some system-wide shortcomings on its own.

The evaluation further highlights that crime trends are evolving rapidly through digitalisation, encrypted communications, AI and crypto-assets, requiring the EPPO to continue developing advanced technological and analytical capabilities. The EPPO must therefore adjust its investigations to the current trends in organised, cross-border, and digital crime. In that respect, a recurring theme in the open-ended responses to the survey carried out in the framework of this evaluation concerned a possible need to explore extending the EPPO's mandate to areas such as direct taxation offences, sanctions violations, excise fraud, cybercrime and broader customs offences.

The evaluation also finds that the EPPO's international cooperation framework may become insufficient over time. Existing Working Arrangements and Memoranda of Understanding with non-EU countries are useful but non-binding, and stakeholders increasingly see a need for more formal and legally binding agreements, as cross-border criminal activity expands globally.

Finally, the EPPO is particularly relevant in the broader context of increasing EU spending under the next Multiannual Financial Framework and the need to continue ensuring the strong and effective protection of the EU budget.

4. Conclusion

The EPPO has successfully put in place a well-functioning EU criminal investigative and prosecutorial system, significantly improving the previously fragmented national landscape. Its strongest achievements lie in the institutional capacity it has built, the coordinated cross-border investigations it has enabled, and the development of operational capabilities that did not previously exist. Its EU added value is therefore evident, in all cases but particularly in cross-border coordination and enforcement. Its relevance remains high, and its overall design is broadly coherent.

At the same time, the EPPO is still a relatively young body, operating in a field where criminal proceedings are complex and often lengthy. The full impact of the EPPO is therefore not yet measurable in a precise and quantifiable manner. Although institutional and operational performance is well evidenced, more time and more mature data will be needed to effectively assess outcome-level results – such as final convictions, confirmed financial recoveries, and deterrence effects. Furthermore, the EPPO has evolved under operational pressures that diverged significantly from the assumptions underlying the original legislative design, particularly in relation to caseload and resource demands. The system also operates under constraints, including legal ambiguities and variability in national legal and procedural frameworks, which may affect consistency and the efficiency of the EPPO's activities.

The evaluation also identifies **areas for improvement**. These include: (i) strengthening the evidence base on outcomes, judicial results and recoveries; (ii) reducing divergences in national implementation; (iii) improving procedural safeguards for suspects and accused persons; (iv) streamlining the EPPO’s data protection rules; and (v) enhancing cooperation and information exchange with relevant actors and the authorities of non-EU countries. Continued attention to operational tools, resources, and legal frameworks will be important to keep pace with increasingly complex and digital forms of fraud.

These findings will feed into the broader reflection in the context of the ongoing review of the EU Anti-Fraud Architecture.