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TABLE OF CONTENTS

1.	JUSTICE & HOME AFFAIRS (JHA) BODIES AND AGENCIES	2
1.	Europol	2
2.	Eurojust	
3.	OLAF	4
4.	The EPPO	
5.	AMLA	6
2.	INFORMATION EXCHANGE AT EU-LEVEL	7
1.	Formal cooperation among EU partners	7
2.	Informal cooperation among EU partners	10
3.	TOWARDS A STRONGER ANTI-FRAUD SYSTEM: REFORM EFFORTS AND THE ROAD AHEAD	14
1.	Eurojust	14
2.	OLAF and the EPPO	14
3.	· ·	
4.	Proposed Directive on Combating Corruption	15
4.	CONCLUSIONS AND RECOMMENDATIONS	16
5.	ENDNOTES	17

ASSESSMENT OF EU NORMS AND PRACTICES ON INFORMATION EXCHANGE

The strength of pre-trial investigations into corruption-related money laundering depends largely on the institutional and legal frameworks that determine the investigative "toolbox" available to investigators. To be effective, they need timely access to information including beneficial and asset ownership data, swift cross-border cooperation, the ability to trace and freeze assets, and clarity of mandates and responsibilities. The EU has developed a multi-layered legal and institutional framework to provide this infrastructure. Yet gaps remain between law on paper, practice in the field and what is needed for efficient investigations and enforcement at national level.

1. JUSTICE & HOME AFFAIRS (JHA) BODIES AND AGENCIES

National law enforcement agencies and Financial Intelligence Units (FIUs) widely recognise the important role of EU-level institutions, bodies, offices and agencies (IBOAs) in supporting effective investigations into corruption-related money laundering cases. While criminal law remains primarily a member state competence, the scale and complexity of cross-border financial crime have necessitated common instruments and specialised agencies. Europol, Eurojust, the European Anti-Fraud Office (OLAF), the European Public Prosecutor's Office (EPPO) and, from 2028, the Anti-Money Laundering Authority (AMLA), together form a multi-layered enforcement ecosystem.

1. Europol

The European Union Agency for Law Enforcement Cooperation (Europol) provides operational support to law enforcement authorities through intelligence collection, analysis and coordination tools.ⁱ In its organisational structure, Europol National Units serve as the crucial liaison bodies between national law enforcement authorities and Europol, facilitating the exchange of information. This happens mainly via the Europol Information System (EIS) and its messaging system, called Secure Information Exchange Network Application (SIENA), which is the agency's central criminal information and intelligence database, ii and the Europol Analysis System (EAS), a fusion centre' that aggregates data from diverse sources, including law enforcement partners, open sources, and commercial databases such as social media platforms, then processes and analyses it to produce threat assessments and alerts. Its specialised centres, notably the European Financial and Economic Crime Centre (EFECC), with

66 heads in 2023, plays a crucial role in identifying transnational money laundering networks.^{iv} Due to its position as the EU hub for intelligence sharing and data processing, Europol is in an ideal position to collect and spread information on cross-border crimes and the best strategies to cope with them. Europol has been producing 'threat assessment documents' which are recognised as key documents for the development of EU criminal policy.^v However, the agency's lack of investigative powers leaves it reliant on national authorities to transform intelligence into prosecutable cases.

Data Highlights

In 2024, Europol supported 3,324 operations and accepted over 114,00 operational contributions (compared to 3,155 supported operations and 107,856 operational contributions in 2023). The EFECC supported 400 operations, produced 2,585 operational reports and established 10 Operational Task Forces (OTF), showing a significant improvement from 2023 where the EFECC established three task forces and produced 2,477 operational reports.

During the year, it coordinated 119 Action Days, which led to the arrest of 979 suspects and the seizure of over EUR 1.15B in criminal assets. Additionally, the EIS facilitated the exchange of more than two million messages, the highest number to date, with more than 3,500 competent authorities connected to it. Europol's secure messaging platform SIENA had an average first-line response time of 3.2 days against 4.2 days in 2023. The system generated more than 13,400 crossmatch reports and hit notifications, which represents a slight decrease comparted to 2023 (14,409).

2. Eurojust

The **European Union Agency for Criminal Justice Cooperation (Eurojust)** plays a pivotal role in supporting prosecutors and judges across the EU and beyond in the investigation and prosecution of serious cross-border crimes by resolving conflicts of jurisdiction, facilitating the use of European Investigation Orders (EIOs), and mutual legal assistance requests, and by providing assistance to Joint Investigation Teams (JITs). Its Case Management System enables national prosecutors to identify links across otherwise fragmented corruption and financial crime cases, which is especially valuable in complex schemes involving bribery, money laundering, or organised criminal groups. Eurojust's growing experience, illustrated by over 500 corruption cases between 2016 and 2021, has resulted in concrete outcomes such as asset freezes, arrests, and convictions.

At the same time, insights from Eurojust's casework on corruption show how structural limitations constrain Eurojust's impact. It has no direct investigative powers and remains dependent on the willingness and timeliness of national prosecutors to execute requests. Divergent legal definitions of corruption, procedural differences, and sensitivities involving politically exposed persons often delay or complicate cooperation. In this sense, the proposed

EU Anti-Corruption Directive, presents an opportunity for greater harmonisation for corruption offences and penalties across the EU. Cases are also hampered by slow responses to EIOs and mutual legal assistance (MLA) requests, or by reluctance to share sensitive banking data. While Eurojust fosters trust and facilitates communication, its effectiveness ultimately hinges on national authorities' capacities and readiness to act.^{ix}

Data Highlights

In 2024, Eurojust handled almost 13,000 cases with the top three crime types being swindling and fraud (4344 cases), drug trafficking (2259 cases) and money laundering (2215 cases).* The top three crime types handled by the Agency has remained the same throughout the years. Two thirds of all cases that Eurojust worked on in 2024 involved one of these crime types. Eurojust supported almost twice as many corruption-related JITs in 2024 compared to 2023, more than half of which were newly established in 2024. The agency also contributed to the seizure and and/or freezing of criminal assets worth over one billion euros. Overall, Eurojust supported 25% more JITs than in 2023—that is more than 300 JITs throughout the year—illustrating national authorities' trust and reliance on Eurojust's services to facilitate judicial cooperation. The number of coordination meetings facilitated by Eurojust to bring together national judicial and law enforcement authorities has also increased over the years, with a total of 640 coordination meetings organised in 2024 compared to 577 in 2023 (the highest number of coordination meetings (256) was organised in relation to economic crimes).

3. OLAF

The **European Anti-Fraud Office (OLAF)** protects the EU's financial interests by conducting administrative investigations into fraud, corruption and serious misconduct involving staff and members of the EU institutions, bodies, offices and agencies. OLAF is also responsible for developing the Commission's anti-fraud policy. Its role is preventive and corrective, issuing recommendations to the EU institutions and the national authorities concerned rather than pursuing prosecutions. Where an OLAF investigation finds sufficient grounds for suspecting a criminal offence, OLAF must report this to the EPPO and/or issue a judicial recommendation for the competent Member State authorities to consider the initiation of judicial proceedings. OLAF continues to issue judicial recommendations to those Member States that have not joined the EPPO (Denmark, Hungary, Ireland) and continues to monitor the implementation of all judicial recommendations issued prior to the EPPO becoming operational and in which final decisions have not yet been made by the Member States concerned. In corruption-related money laundering cases, OLAF often provides the first leads on irregularities.^{xi}

Data Highlights

In 2024, OLAF concluded 246 investigations, opened 230 new investigations and recommended the recovery of €871.5 million and the prevention €43.5 million from being unduly spent.xii In the last three years, OLAF investigations have led to recoveries of €4.5 billion and have prevented over €800 million of irregular spending. For OLAF judicial recommendations issued between 2020 and 2024, national judicial authorities took 104 decisions, of which 39% resulted in an indictment. Between 2020 and 2024, OLAF issued 285 administrative recommendations, with the largest recipient being the European Commission with its executive agencies with 221 recommendations. Out of the 285 administrative recommendations issued, the authorities concerned have taken a decision on 154 while for the remaining 131 recommendations action is still pending. Based on the decisions taken, 82% of administrative recommendations have been either fully or partly implemented.

4. The EPPO

The **European Public Prosecutor's Office (EPPO)** represents a major innovation: for the first time, the EU has a body with direct powers to investigate, prosecute and bring to judgment offences against the EU's financial interests, including complex money laundering cases linked to corruption. Currently, 24 Member States joined the EPPO, while Denmark, Hungary, Ireland do not participate. The EPPO exercises the functions of prosecutor before the courts of the participating Member States, independently from the Commission, other EU institutions and the Member States, through the European Delegated Prosecutors (EDPs). They are embedded in national systems and can carry out pre-trial measures such as searches, seizures, and freezing of assets, using tools like European Investigation Orders (EIOs) to obtain cross-border evidence. While EDPs operate independently within their Member State and are empowered to lead investigations, the execution of investigative measures is carried out by national law enforcement authorities, in accordance with the applicable national procedural law.

Data Highlights

By the end of 2024, the EPPO had 2666 active investigations, for a total estimated damage of over €24.8 billion.xiV In the same year, VAT fraud accounted for more than 53% of the overall estimated damage, worth €13.15 billion, with 488 active investigations, highlighting its dominant role among the EPPO's caseload. Out of all the investigated offences carried out in 2024, only 191 (3.01%) were related to corruption, raising questions about corruption potentially being overlooked by the EPPO. In 2024, the Office processed 6547 crime reports, 70% of which came from private parties, some 27% from national authorities, and less than 1% from OLAF. 205 indictments were filed, meaning that more perpetrators of EU fraud were brought to judgment in front of national courts compared to 2023 (47%). National judges granted European Delegated Prosecutors freezing orders worth €2.42 billion, while the value of assets frozen during the year amounted to €849 million.

5. AMLA

The forthcoming **Anti-Money Laundering Authority (AMLA)** is intended to add a crucial supervisory and intelligence dimension. According to the AMLA Regulation,^{xv} the new decentralised agency will coordinate national authorities to ensure the correct application of AML rules in the EU. The authority will be fully operational in 2028, and it will begin direct supervision of 40 selected entities. To facilitate cooperation and the exchange of information in the field of law enforcement and judicial cooperation AMLA will be able to conclude working arrangements, with Union institutions, decentralised agencies and other Union bodies.

Together, these bodies, offices and agencies offer a strong architecture for tackling corruption-related money laundering cases before trial. Yet challenges, such as inconsistent Member State participation, overlapping mandates, sovereignty sensitivities, adequate budget resources, and data protection constraints undermine the EU's collective capacity to effectively monitor and combat financial cross-border crime.

2. INFORMATION EXCHANGE AT EU-LEVEL

1. Formal cooperation among EU partners

Cooperation between EU partners is a cornerstone of the EU's efforts to combat cross-border financial crime. Both formal and informal collaboration mechanisms play an essential role in facilitating timely information exchange to better coordinate investigations and to ensure successful prosecutions.

A cooperation agreement^{xvi} between **Eurojust and Europol**, dating back to January 2010, solidified efforts to foster closer cooperation by increasing their information exchange. However, as pointed out in the recent evaluation^{xvii} of the Eurojust Regulation, Eurojust's cooperation with partners at the EU level, particularly with Europol, could be improved. The working arrangement between the two agencies was in fact not updated when the mandate of the two agencies was amended in 2016 and 2018, thereby affecting their effective cooperation. Moreover, although information between the Eurojust and Europol may be transmitted either spontaneously, or on request, there appear to be no specific workflows for data exchanges between the two agencies. According to the study conducted for the Eurojust evaluation, xviii although Eurojust should operate, among other things, on the basis of information provided by Europol, Europol does not appear to proactively or promptly share such information in practice. The hit/no-hit data exchange mechanism between the two agencies, established under Article 49 of the Eurojust Regulation, also yields limited results due to data ownership restrictions and Eurojust's outdated IT infrastructure. Similar challenges regarding data ownership and the implementation of the hit/not-hit system might limit the effectiveness of cooperation with the EPPO as well. As result, each individual hit requires substantial manual verification, thus increasing the length of their cooperation. These limitations, connected to Eurojust's outdated IT infrastructure, xix undermine the interoperability between the two agencies and compromise the agency's fight against serious cross border crime.

It is expected that by 1 December 2027, Eurojust will set up new technical infrastructures, replacing the **Case Management System**,^{xx} and that by 1 November 2027 secure digital channels between Eurojust and competent national authorities of the Member States will be operational. What is still missing is the interoperability of the various communication channels and platforms at intelligence, law enforcement and criminal justice level.

Key tools and networks that facilitate cooperation include Europol's **SIENA** (a secure digital communication channel for law enforcement across the EU and partner countries), **CARIN** (an informal network of practitioners, law enforcement, prosecutors, and asset recovery specialists, focused on tracing, freezing, and confiscating criminal assets), and **AMON** (a

network of national Asset Recovery Offices designated by EU Member States that facilitates operational cooperation and intelligence sharing on asset tracing).**xi The work on the development of the JITs collaboration platform has continued over the year, with the start of operations planned before the end of the year. The online platform will enable secure communication and collaboration between judicial and police authorities working under the aegis of joint investigation teams. The JITs collaboration platform will be accessible to all actors involved in JIT proceedings, i.e. Member States' representatives fulfilling the role of members of a given JIT, representatives of third countries invited to cooperate in the context of a given JIT, and the competent Union bodies, offices and agencies such as Eurojust, Europol, the EPPO and OLAF. Member States and competent Union bodies, offices and agencies will have to make technical arrangements necessary to enable them to access the platform.

Table 1: Cooperation with EU bodies and agencies in 2024

EU bodies and	New cases opened	Coordination	Coordination	JITs
agencies	in 2024	meetings	centres	
Europol (European	36	121	7	52
Agency for Law				
Enforcement				
Cooperation)				
EPPO (European	7	2	1	2
Public Prosecutor's				
Office)				
OLAF (European Anti-	4	5	0	0
Fraud Office)				

The EPPO is OLAF's most important partner in prosecuting crimes affecting the EU's financial interests. OLAF and the EPPO have distinct but complementary mandates. While OLAF focuses on administrative inquiries and the EPPO on criminal prosecutions, their shared responsibility for protecting the EU's financial interests requires **seamless cooperation**. The amended OLAF Regulation and the EPPO Regulation attempt to prevent duplication by obliging OLAF to report criminal conduct to the EPPO, introducing a "**hit/no-hit" system** in their case management tools, and enabling complementary investigations. A "hit" triggers discussions on next steps and usually means the case falls under the EPPO's jurisdiction, so OLAF must step back unless the EPPO authorises it to proceed.xxiii Within the limits of their respective mandates, OLAF and the EPPO may also exchange relevant information spontaneously or upon request, adhering to confidentiality and data protection rules. As reported by the EPPO, replies to requests are generally expected within 20 working days. According to the EPPO, the office maintains formal information exchanges daily with national authorities, weekly with OLAF and Europol, monthly with the European Commission, and occasionally/occasionally with Eurojust.

However, practical hurdles persist in ensuring interoperability of case management systems, guaranteeing respect for different national procedural safeguards, and aligning investigative timelines remain complex tasks. Moreover, OLAF's continued responsibility for non-

participating Member States and third-country cases adds another layer of coordination difficulty. *xiiiAnalysis of trends in reporting to the EPPO highlights a significant imbalance across sources. While overall reporting has grown strongly since 2021, the increase has been driven almost entirely by private parties, whose submissions more than doubled in 2024 alone. Reports from national authorities have also grown steadily, though at a slower pace. By contrast, reports from IBOAs have remained largely stagnant, with only minimal increases over the past four years. Less than 1% of cases were reported from OLAF in 2024. According to the EPPO, OLAF receives considerably more reports than it transmits to the EPPO, possibly due to OLAF's practice of conducting preliminary assessments before transmitting such cases to the office.**XXIV While such assessments may improve the quality of reports, they may also delay transmission or result in cases being filtered out altogether, even in circumstances where a criminal investigation might later reach a different conclusion.

Table 2: Trends in crime reports received by the EPPO, by source of reporting authority (2021–2024)

Year	From national authorities	From EU bodies	From private parties
2024	1760 (+13%)	113 (+5%)	4623 (+85%)
2023	1562 (+24%)	108 (+5%)	2494 (+30%)
2022	1258 (-7%)	103 (-46%)	1924 (+50%)
2021	1351*	190*	1282

^{*} According to EPPO includes backlog

According to the EPPO, Europol should become the central analysis hub for crimes related to the EU's financial interests, supported by a shared EPPO-Europol platform accessible to national law enforcement agencies and by dedicated police, tax, and customs officials working on EPPO cases. The EPPO also stresses the need for direct access to key databases such as **VIES** (VAT Information Exchange System), **CESOP** (Central Electronic System of Payment information), and AMLA databases, while a new EU platform interconnecting existing databases with automatic "hit/no-hit" checks would streamline information flows.**

Finally, AMLA has also begun preparing for formal cooperation with Europol, Eurojust, EPPO and OLAF through the development of working arrangements covering strategic and operational exchanges, technical interoperability, and liaison mechanisms. AMLA will take over from the European Banking Authority (EBA) the **EuReCA** database which contains information on "material weaknesses"xxvi in financial institutions and remedies taken by supervisors, and from the Commission the EU's Beneficial Ownership Registers Interconnection System (**BORIS**) and the Bank Account Registers Interconnection System (**BARIS**).

These efforts aim to lay the groundwork for a coordinated approach once formal agreements are finalised.

Table 3: EU Agencies: formal cooperation channels overview

EU Agency	Formal cooperation channels		
Eurojust	Case Management System		
	JITs Collaboration Platform		
	SIENA (via Europol)		
	• CARIN, AMON		
Europol	• SIENA		
	• CARIN, AMON		
EPPO	Case Management System		
	JITs Collaboration Platform (via Eurojust)		
OLAF	SIENA (via Europol)		
	JITs Collaboration Platform (via Eurojust)		
AMLA	EuReCa		
	• BORIS		
	BARIS		

2. Informal cooperation among EU partners

Cross-border criminal investigations in the EU rely not only on formal legal instruments but also on informal operational exchanges. Formal mechanisms only work effectively when supported by trust-based informal exchanges.

Informal cooperation is not binding and relies heavily on personal networks, professional contacts, and operational familiarity. These mechanisms facilitate rapid and often immediate exchange of information that are essential for initiating and supporting formal procedures. While information shared through such channels is not automatically admissible in court, it plays a crucial role in preparing formal requests and avoiding misunderstandings that can delay investigations.

Several EU bodies have institutionalised informal cooperation through structured working groups and regular exchanges.

The **EPPO and OLAF** organise high-level meetings between OLAF's Director General and the European Chief Prosecutor at least once a year to discuss matters of common interest. The last OLAF-EPPO operational conference took place in April 2024 in a spirt of high collaboration to discuss best practices and practical challenges encountered when investigating complex cross-border fraud cases.**

Moreover, the two agencies may also designate ad-hoc contact points for specific cases and exchange information in regular, yet more informal, meetings at technical level known as 'clearing-house meetings'. Practitioners report that the EPPO engages in information exchange on a daily basis with national authorities, weekly with OLAF, Europol

and the European Commission, and finally monthly with Eurojust. However, despite these regular interactions, obstacles continue to hinder effective information sharing, most notably: limited expertise, trust issues between actors and incompatibilities between IT systems.

In 2024, **Eurojust and Europol** set up an informal working group to explore the business needs and opportunities for cooperation between the two agencies. The group met regularly throughout the year to discuss opportunities for future cooperation, including on securing digital evidence. The Commission has set up an informal internal working group to build synergies among the four main players active in the fight against fraud (Europol, Eurojust, OLAF and the EPPO). A critical aspect of the future relations among Eurojust, Europol, OLAF and the EPPO will be the possible interoperability among their respective IT systems, which remains difficult given the current fragmentation. In fact, each agency uses different communications channels and systems, even though email remains a common but separate method of exchange.

An illustrative development of the transition toward a more integrated and interoperable system is the evolution of the **Financial Intelligence Unit Network (FIU.net)**, an informal and decentralised computer network for the exchange of information among the Financial Intelligence Units (FIUs) of the EU. Currently hosted by the European Commission, FIU.net's management will soon be transferred to the new established AMLA under the recently adopted AML package.xxviii While informal cooperation mechanisms do not replace formal legal instruments, they are indispensable in making those instruments work in practice. They allow law enforcement and judicial authorities across the EU to act swiftly, coordinate efficiently and build the operational foundation for legally sound and timely formal procedures.

Table 4: Overview of formal and informal cooperation and information exchange mechanisms

Aspect	Formal Cooperation Mechanisms	Informal Cooperation Mechanisms
Nature	Legally binding, based on EU law	Non-binding, trust-based, relies on networks and personal contacts
Key Tools (EU)	SIENA, CARIN, AMON, Joint Investigation Teams (JITs) via Eurojust with the support of Europol and/or other EU agencies, JITs collaboration platform, European Investigation Order (EIO) and Information Exchange Directive (2023/977).	High level meetings, working groups, clearing- house meetings, networking events, day-to-day professional contacts and FIU.net
Key Tools (Non- EU)	Mutual Legal Assistance Treaties (MLATs)	Interpol, personal/professional contacts, ad hoc task forces
Speed	Often slower; ElOs (30 days), Information Exchange Directive (8 hours/3 days); MLATs	Rapid; often immediate (phone, bilateral

	often significantly delayed	conversations))
•	· ·	Information not admissible but essential to prepare admissible requests and identify leads

Table 5: Good Practice case-studies

EU-level agency	Crime	Agency's role	Participating	Action and Result
			countries	
Europol (European Agency for Law Enforcement Cooperation)	VAT fraud worth €195 million, involving 14 suspects across 17 countries. ^{xxix}	supported the investigation, led by the EPPO, by providing coordination and operational assistance.	Cyprus, Croatia,	On 28 February, authorities carried out over 180 coordinated searches across 17 countries. A total of 680 tax and police investigators participated in the operation, which led to the arrest of 14 main suspects. Law enforcement seized over €15.3 million worth of smartphones, a €3 million yacht, and €1.2 million in cash and cryptocurrency. Several luxury cars, including a Rolls Royce, a BMW, and a Range Rover, were also confiscated, along with jewellery.
	Two main suspects in Lithuania and Latvia laundered €2 billion through a global network of shell companies, offering money laundering as a service across the EU. A third suspect used the same network to launder €15 million defrauded from Italian public funds, linked to a Lithuanian financial institution.**	supported the establishment of a JIT, eight coordination meetings, and a coordination centre to enable joint actions in three countries and avoid	Lithuania	In February 2024, a joint action day supported by Eurojust and Europol involved 250 officials and 55 searches across Italy, Latvia, and Lithuania. Europol deployed experts to assist on-site and at Eurojust. The operation resulted in 18 arrests, including the main suspects, and €11.5 million in frozen assets and accounts.

EPPO (European	Massive VAT fraud	The EPPO led the	Belgium, Cyprus,	Estimated VAT-related damages
Public	involving electronic	Admiral by	France,	reached €2.2 billion, with around
Prosecutor's	goods, money	facilitating cross-	Germany,	€59 million in seized assets,
Office)	laundering, tax	border	Greece, Italy, the	including real estate (€46m), cars,
	evasion, passive and	cooperation,	Netherlands,	cash, luxury goods, and company
	active corruption,	secured evidence.	Portugal,	shares. Portugal's first trial began
	document forgery and	It oversaw judicial	Hungary,	in October 2024, with 26 suspects
	criminal	actions, including	Slovakia, Spain	charged with VAT fraud, money
	conspiracy. ^{xxxi}	arrests, asset	and Romania.	laundering, corruption, and
		seizures, and		forgery. In May 2025, 10
		trials.		individuals and 13 companies were
				convicted, receiving up to 8 years
				in prison and joint asset
				confiscation of €80 million. ^{xxxii}
				Later phases ("Admiral 2.0" and
				"3.0") uncovered further VAT fraud
				in the Baltics and Greece, adding
				€297 million in losses and
				prompting arrests and seizures
				across 16 countries.
OLAF (European	Fraud affecting the	The effective	OLAF in	The investigation led by OLAF
Anti-Fraud Office)	EU's financial	cooperation		concerned four projects co-
,		between OLAF,	-	financed by the EU for the
		the EPPO and		purchase of specialist machinery,
		national		via the European Regional
		authorities led to		Development Fund, aimed at
		a	Czechia and the	improving productivity in the
		recommendation	EPPO.	manufacturing sector of Czechia.
		for the recovery of		In cooperation the Czech
		almost €4		authorities and the EPPO, OLAF
		million to the EU		was able to prove that the
		budget		companies had purchased second
		and charging 13		hand machinery and claimed it as
		people and three		new. Not only was the machinery
		companies with		ineligible for funding but it was not
		subsidy fraud.		used for its stated purpose.

3. TOWARDS A STRONGER ANTI-FRAUD SYSTEM: REFORM EFFORTS AND THE ROAD AHEAD

The European Union's anti-fraud architecture is currently undergoing a comprehensive reform process involving several justice & home affairs (JHAs), bodies and agencies including Eurojust, Europol, European Anti-Fraud Office (OLAF) and the European Public Prosecutor's Office (EPPO). These revisions aim to enhance effectiveness, operational capacity and inter-agency cooperation in combatting cross-border crime and protecting the EU's financial interest. As part of this effort, the European Commission is conducting evaluations to consider the regulations' revisions for each body and agency, based on performance and evolving operational needs.

1. Eurojust

According to the Eurojust evaluation, published on 2 July 2025, the agency plays a pivotal role in supporting and coordinating judicial cooperation between national authorities in complex cross-border investigations and prosecutions. The evaluation found that cooperation with third countries is very effective, especially via Liaison Prosecutors.

Despite Eurojust's overall effectiveness, the last evaluation identified several key weakness and challenges hampering its full potential. Its overly broad and undefined interpretation of what constitutes "operational" seems to be problematic. Cooperation with partners has been found to be effective but too many simple cases end up being dealt by Eurojust instead of the Eurojust National Coordination System (ENCS). Moreover, while cooperation with Europol is satisfactory, the overall structure collaboration between the two agencies lacks efficiency. Finally, even if cooperation with third countries is very effective, its expansion is complicated by lengthy and burdensome procedures required to conclude new agreements.

2. OLAF and the EPPO

The EPPO and OLAF Regulations are subject to an evaluation, which the Commission is required to conclude by 1 June 2026. An important aspect which will be considered and assessed in both evaluation is the effectiveness and efficiency of the cooperation between the EPPO and OLAF. The two evaluation reports may serve as a basis for possible legislative initiatives to amend the EPPO and OLAF Regulations, also by looking into ways to enhance their complementarity and foster an early information exchange.

3. Europol

In July 2024, the Commission presented to the European Parliament its Political Guidelines proposing to make Europol a "truly operational police agency". An initiative to propose a new Europol Regulation is also on the table. According to the Commission, the new proposal to strengthen the mandate of the agency will build on the evaluation of the current Europol Regulation as well as an impact assessment and consultation with stakeholders, the European Parliament and Member States. Although an initial evaluation of the Europol Regulation was due on 1 May 2022, with the entering into force of the amended Europol Regulation, the Commission has postponed it to 29 June 2027.xxxviii

4. Proposed Directive on Combating Corruption

A broader legislative initiative is underway trough the **proposed Directive on Combating Corruption**, which seeks to strengthen Member States' anti-corruption framework and promote closer collaboration between national authorities and EU bodies. According to the proposal, Member States are required to collected statistical data on criminal offences and are encouraged to cooperate with the European Commission, Europol Eurojust, OLAF and the EPPO in the fight cross-border crimes. To that end, EU agencies and the Commission will have to provide technical and operational assistance in accordance with their respective mandates to facilitate the coordination of investigations and prosecutions by competence authorities.

Lastly, in July 2025, the Commission launched^{xxxix} a process to review the so-called EU Anti-Fraud Architecture (AFA) in an effort to streamline the work of the different authorities responsible for protecting the EU's financial interest. The process is accompanied by a white paper^{xl} which forms a critical part of the preparatory process of the next Multiannual Financial Framework. The AFA Review aims to minimise duplication between actors, improve the use of digital tools, and explore a more centralised governance structure. The Paper highlights the importance of enhanced information sharing, the use of Al and data analytics for early fraud detection, as well as stronger investigations and improved coordination among EU bodies. It stresses that protecting the EU's financial interest is a shared responsibility between the EU institutions and the Member States, and that each entity play its part. The outcome of this review, expected in a Commission communication in 2026, may include legislative proposals to strengthen the AFA, offering a unique opportunity to create a more coherent and efficient system.

CONCLUSIONS & RECOMMENDATIONS

- TI EU welcomes the Commission's initiative to review the EU Anti-Fraud Architecture (AFA). This should lead to the creation of a more centralised model to enhance coordination, reduce duplication, and standardise information-sharing practices across EU bodies and agencies.
- This exercise should be accompanied by appropriate legislative proposals to streamline and enhance the cooperation between the EPPO and OLAF, between the EPPO and Europol, as well as between Eurojust and Europol.
- The Commission should strengthen Europol's critical partnership with the EPPO especially regarding data analysis by further enhancing its capacity to collect and analyse data to support EPPO's operational analysis and investigations.
- The Commission should enhance coordination and reporting of cases between OLAF and the EPPO for crimes against the EU's budget, while also promoting – where necessary – the use of complementary administrative investigations to fully protect the EU budget.
- The process for the recovery of EU funds should be improved by ensuring that OLAF recommendations and the EPPO's notifications are effectively followed up upon, leading to better recovery rates for the EU budget
- Eurojust should be granted enhanced operational tools. The adoption of a more harmonised legal framework through the proposed EU Anti-Corruption Directive will help to overcome its structural limitations, accelerate the execution of European Investigation Orders (EIOs) and mutual legal assistance (MLA) requests. This measure will facilitate more effective cooperation in complex corruption cases.
- The IT systems of Eurojust, Europol, OLAF, and the EPPO should be made fully interoperable to standardise and streamline information-sharing practices across EU bodies and agencies.
- The AMLA should conclude working arrangements with Europol, Eurojust, OLAF and the EPPO, to facilitate cooperation and the exchange of information for preventing and detecting money laundering. The AMLA should also ensure the smooth transfer of the EuReCA, BORIS, and BARIS databases from the European Banking Authority (EBA) to strengthen its role in harmonising anti-money laundering supervisory efforts.

ENDNOTES

ⁱ Europol Regulation (EU) 2022/991. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32022R0991

"Europol Information System (EIS) (2025, August 18). Available

at: https://www.europol.europa.eu/how-we-work/services-support/information-exchange/europol-information-system

iii Europol (2025, August 18). "Strategic Analysis: Completing operational analysis". Available at: https://www.europol.europa.eu/how-we-work/services-support/information-exchange/strategic-analysis

iv Europol. Europol Programming Document 2024 – 2026. Available

at: https://www.europol.europa.eu/cms/sites/default/files/documents/Europol_Programming_ Document_2024-2026.pdf

^v The Internet Organised Crime Threat Assessment (2024, June 12). Available at: https://www.europol.europa.eu/publication-events/main-reports/internet-organised-crime (2025, May 27). Available at: https://www.europol.europa.eu/publication-events/main-reports/changing-dna-of-serious-and-organised-crime

vi Europol Consolidated Annual Activity Report (2025, June 25). Available at: https://www.europol.europa.eu/publications-events/publications/consolidated-annual-activity-reports-caar

vii Eurojust Regulation (EU) 2018/1727. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1727

viii Eurojust Casework on Corruption: 2016-2021 Insights (2022, May 05). Available at: https://www.eurojust.europa.eu/news/eurojust-publishes-first-report-corruption-number-cross-border-cases-rises

ix viii Eurojust. Eurojust Casework on Corruption: 2016-2021 Insights (2022, May 05). Available at: https://www.eurojust.europa.eu/sites/default/files/assets/eurojust-casework-on-corruption-2016-2021-insights-report.pdf

* Eurojust Annual Report 2024

xi 1999/352/EC, ECSC, Euratom: Commission Decision of 28 April 1999 establishing the European Anti-fraud Office (OLAF) (notified under document number SEC (1999) 802). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31999D0352

xii OLAF report 2024 (2025, June 16). Available at: https://ec.europa.eu/olaf-report/2024/executive-summary en.html

xiii Echanove Gonzalez de Anleo, J., & Kolloczek, N. (2021). *The European Anti-Fraud Office and the European Public Prosecutor's Office: A work in progress. EUCRIM: European Criminal Law Issues*, (3/2021) p. 187–190. Available at: https://doi.org/10.30709/eucrim-2021-028

xivEPPO Annual Report 2024 (2025, March 3). Available at:

https://www.eppo.europa.eu/assets/annual-report-2024/index.html

** AMLA Regulation (EU) 2024/1620. Available at: https://eur-

lex.europa.eu/eli/reg/2024/1620/oj/eng

- ^{xvi} Eurojust -Europol Agreement 2010. Available
- at: https://www.europol.europa.eu/cms/sites/default/files/documents/Agreement between Europol.pdf
- xvii Eurojust Evaluation, 2 July 2025. Available
- at: https://commission.europa.eu/publications/evaluation-eurojust_en
- xviii Support study for the Evaluation of the implementation and impact of Eurojust Regulation, and the effectiveness and efficiency of Eurojust and its working practices. Available at: 5e3ed350-fa8e-4c36-a97e-c3c676a09f01_en
- xixEurojust Annual Report 2024 (2025, May 2025). Available
- at: https://www.eurojust.europa.eu/about-us/planning-and-reporting/annual-report
- xx Document summary | Legislative Observatory | European Parliament
- ^{xxi} Transparency International (2025, July–August). *Anonymous interviews with law enforcement agencies and investigating prosecutors.*
- ^{xxii} EPPO, Response to survey questions asked by Transparency International EU via email, (2025, April 17).
- ^{xxiii} Echanove Gonzalez de Anleo, J., & Kolloczek, N. (2021). *The European Anti-Fraud Office and the European Public Prosecutor's Office: A work in progress. EUCRIM: European Criminal Law Issues*, (3/2021) p. 187–190. Available at: https://doi.org/10.30709/eucrim-2021-028
- ^{xxiv} EPPO, Response to survey questions asked by Transparency International EU via email, (2025, April 17).
- xxv EPPO, Response to survey questions asked by Transparency International EU via email, (2025, April 17).
- xxvi EuReCA, EBA's AML/CFT Database. Available at:
- https://www.eba.europa.eu/sites/default/files/document_library/Publications/Other%20publications/2023/1056253/EuReCA%20Factsheet%20%2031%2005%202023.pdf
- xxvii Press Release EPPO, "OLAF-EPPO operational conference: strengthening partnership to ensure fraud with EU money does not pay", (2024, April 23). Available at:
- https://www.eppo.europa.eu/en/media/news/olaf-eppo-operational-conference-strengthening-partnership-to-ensure-fraud-eu-money-does
- xxviii The EU's new anti-money laundering package: what's in it?, *Transparency International EU* (2024, April 29). Available at: https://transparency.eu/the-eus-new-anti-money-laundering-package-whats-in-it/
- xxix Press Release EPPO, "EPPO investigation cluster Midas: €195 million VAT fraud spread across 17 countries", (2024, February 29). Available at:
- https://www.eppo.europa.eu/en/media/news/eppo-investigation-cluster-midas-eu195-million-vat-fraud-spread-across-17-countries
- xxx Press Release Eurojust, "Full-scale action against EUR 2 billion money laundering network via Lithuanian financial institution", (2024, February 27). Available at:
- https://www.eurojust.europa.eu/news/full-scale-action-against-eur-2-billion-money-laundering-network-lithuanian-financial
- xxxi Press Release EPPO, "Investigation Admiral 2.0: Europe's biggest VAT fraud with links to organised crime", (2024, November 28). Available at:
- https://www.eppo.europa.eu/en/media/news/investigation-admiral-20-europes-biggest-vat-fraud-links-to-organised-crime

xxxii Press Release EPPO, "Investigation Admiral: First convictions in Portugal for 23 defendants guilty of massive international VAT fraud", (2025, May 12). Available at:

https://www.eppo.europa.eu/en/media/news/investigation-admiral-first-convictions-portugal-23-defendants-guilty-massive

xxxiii OLAF report 2024 (2025, June 16). Available at: https://ec.europa.eu/olaf-report/2024/investigative-activities/protecting-eu-funds/investigations-in-eu-member-states en.html

xxxiv Evaluation of Eurojust, 2 July 2025. Available

at: https://commission.europa.eu/publications/evaluation-eurojust en

xxxv Public Consultations and Feedback, New Europol regulation (proposal) - Upcoming public consultation planned for the third quarter of 2025. Available

at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14638-Law-enforcement-cooperation-new-Europol-regulation-proposal-en

xxxvii Public Consultations and Feedback, New OLAF Evaluation - Upcoming adoption planned for the first quarter of 2026. Available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14267-Regulation-on-the-European-Anti-Fraud-Office-OLAF-Evaluation_en xxxviii Public Consultations and Feedback, EPPO Evaluation - Final version planned for the second quarter of 2026. Available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14308-European-Public-Prosecutors-Office-EPPO-evaluation_en

xxxviii Evaluation and revision of Europol mandate: Questions for written answer E-002954/24 to the Commission Raquel García Hermida-Van Der Walle (Renew), Lucia Yar (Renew), Irena Joveva (Renew), 16 December 2024. Available

at: https://www.europarl.europa.eu/RegData/questions/reponses_qe/2024/002954/P10_RE(202_4)002954_EN.pdf

xxxix Commission Press Release, 16 July 2025, "Commission unveils anti-fraud revamp to protect the EU budget". Available at: https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1849 xl Anti-fraud Architecture Review, 18 July 2025. Available

at: https://commission.europa.eu/publications/anti-fraud-architecture-review_en