

Brussels, 30 June 2025
(OR. en)

11059/25

Interinstitutional File:
2020/0361 (COD)

COMPET 672
MI 495
JAI 976
TELECOM 224
CT 86
PI 144
AUDIO 63
CONSOM 123
IA 77
JUSTCIV 122
FIN 801

COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	30 June 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
No. Cion doc.:	SWD(2025) 175 final
Subject:	COMMISSION STAFF WORKING DOCUMENT Overview of elements accounted for the estimation of the amount of external assigned revenues stemming from the supervisory fee pursuant to Article 6(1) of Commission Delegated Regulation (EU) 2023/1127

Delegations will find attached document SWD(2025) 175 final.

Brussels, 27.6.2025
SWD(2025) 175 final

COMMISSION STAFF WORKING DOCUMENT

Overview of elements accounted for the estimation of the amount of external assigned revenues stemming from the supervisory fee pursuant to Article 6(1) of Commission Delegated Regulation (EU) 2023/1127

1. Introduction

- (1) Article 43(4) of Regulation (EU) 2022/2065 of the European Parliament and of the Council ('Regulation (EU) 2022/2065')¹ requires the Commission to adopt delegated acts laying down the detailed methodology and procedures regarding the supervisory fees charged by the Commission on providers of very large online platforms ('VLOPs') and of very large online search engines ('VLOSEs'). On 2 March 2023, the Commission adopted Commission Delegated Regulation (EU) 2023/1127 ('Delegated Regulation (EU) 2023/1127')² pursuant to that provision.
- (2) In accordance with Article 6(1), second subparagraph, of Delegated Regulation (EU) 2023/1127, the Commission shall prepare an overview accompanying the estimated amount of external assigned revenues stemming from the supervisory fees that is included in the Commission preparatory document attached to the draft budget pursuant to Article 41(8) of Regulation (EU, Euratom) 2024/2509 ('the Financial Regulation')³. Such overview indicates the elements accounted for such estimation and is to be published at the latest by 30 June of each calendar year on the Commission website.
- (3) The present overview reflects the estimation of costs to be incurred in 2026 for the performance of the tasks referred to in Article 43(2) of Regulation (EU) 2022/2065 and the elements accounted for such estimation as per costs categories listed in Article 2 of Delegated Regulation (EU) 2023/1127 and Annex I to that Delegated Regulation. Pursuant to Article 2(3) of Delegated Regulation (EU) 2023/1127, the estimation of overall costs for 2026 is to be increased by the amount of the deficit incurred in 2024, as included in the report referred to in Article 8(4) of that Delegated Regulation⁴.
- (4) Up until the date of publication of this staff working document, the Commission adopted decisions designating 23 online platforms and two online search engines as VLOPs and VLOSEs, and a decision terminating the designation of one VLOP.⁵
- (5) Pursuant to Articles 92 and 33(6) of Regulation (EU) 2022/2065, the obligations laid down in that Regulation shall apply to the providers of those VLOPs and VLOSEs from four months after the notification of those decisions to those providers. This includes the obligations laid down in Section 5 of Chapter III of Regulation (EU) 2022/2065 which, pursuant to Article 56(2) of that Regulation, the Commission has exclusive powers to supervise and enforce. In addition, the Commission, pursuant to Article 56(3) of Regulation (EU) 2022/2065, shall have powers to supervise and enforce that Regulation, other than the obligations contained in Section 5 of Chapter III thereof, against providers of VLOPs and VLOSEs. In parallel, the Commission services are continuously

¹ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act) (OJ L 277, 27.10.2022, p. 1, ELI: <http://data.europa.eu/eli/reg/2022/2065/oj>).

² OJ L 149, 9.6.2023 p. 16.

³ OJ L, 2024/2509, 26.9.2024, ELI: <http://data.europa.eu/eli/reg/2024/2509/oj> .

⁴ COM(2025) 150, p. 5.

⁵ <https://digital-strategy.ec.europa.eu/en/policies/list-designated-vlops-and-vloses>

monitoring online platforms and online search engines in view of the possible adoption of additional designation decisions.

- (6) Throughout 2026 and in the following years, the Commission services will need to further develop the setup, implementation and operationalisation of the structures to fulfil their supervisory tasks under Regulation (EU) 2022/2065. This concerns the supervisory structures necessary for the designation and day-to-day supervision of providers of VLOPs and VLOSEs, including establishing close links with national supervisory structures involved in the supervision and operativity of the database pursuant to Article 24(5) of Regulation (EU) 2022/2065. In addition, the Commission services need to intensify the cooperation mechanisms across national supervisory systems, including the operations of the European Board for Digital Services ('the Board') and the implementation of the information sharing system connecting national authorities, the Commission and the Board pursuant to Article 85 of that Regulation. Lastly, the Commission services will need to strengthen the development and coordination of the expertise and capabilities necessary for the performance of day-to-day supervision, identification and assessment of systemic and emerging issues related to the matters covered by Regulation (EU) 2022/2065.
- (7) The estimation of the amount of external assigned revenues stemming from the supervisory fees to be collected in 2025 for 2026 has been established in view of these tasks. This document provides an overview of the elements accounted for such estimation, specifying, as per Article 2(2) of Delegated Regulation (EU) 2023/1127, the human resources on the one hand and other administrative or operational expenditure on the other hand. Such estimation is included in part V of the working document accompanying the Draft General Budget of the Union for Financial Year 2026⁶ pursuant to Article 41(8) of the Financial Regulation.

2. Human resources

- (8) The total number of Full-Time Equivalents (FTEs) required to fulfil the tasks outlined in Article 43(2) of Regulation (EU) 2022/2065 is estimated to be **270 FTEs** for the year 2026.
- (9) This estimation considers the following elements to determine the annual costs related to the tasks referred to in Article 43(2) of Regulation (EU) 2065/2022:
 - a. Designation, including FTEs dedicated to the identification of online platforms and online search engines to be designated and the preparation of decisions for designation of VLOPs/VLOSEs pursuant to Article 33 of Regulation (EU) 2022/2065, and connected administrative and legal activities, notably the management of the workflow related to the annual supervisory fees;
 - b. IT systems, including FTEs dedicated to the establishment and maintenance of the information sharing system established to support communications between Digital Services Coordinators ('DSCs'), the Commission and the Board pursuant to Article 85 of Regulation (EU) 2022/2065 ('AGORA'); the management of the information system registry supporting supervisory procedures and information management of the

⁶ [COM\(2025\) 300, p. 65](#)

Commission under Section 4 of Chapter IV of Regulation (EU) 2022/2065, as well as the set-up, maintenance and operation of the database pursuant to Article 24(5) of Regulation (EU) 2022/2065; support to the users of such systems;

- c. The Board, including FTEs dedicated to supporting the Board through the Board's secretariat and the Commission's chairmanship pursuant to Article 62 of Regulation (EU) 2022/2065; the management and preparation of decisions of the Commission on referrals raised by the Board pursuant to Article 59 of Regulation (EU) 2022/2065;
- d. Supervisory expertise, including FTEs dedicated to the identification and assessment of systemic and emerging issues, including emerging risks and the development of expertise and capabilities pursuant to Article 64 of Regulation (EU) 2022/2065, including the management of activities carried out by or with the European Centre on Algorithmic Transparency ('ECAT')⁷, and other cooperation agreements with Member States authorities, supranational bodies and other relevant authorities;
- e. Legal support and case handling, including FTEs assigned to the general supervision of designated VLOPs and VLOSEs, as well as the management of specific investigation and infringement procedures, both for substantive assessment, supervision, and legal or procedural support;
- f. Decentralised/on-field supervisory support, including FTEs assigned to provide expertise and case liaison support seconded to EU Permanent Representations, third country EU delegations or within national DSCs for monitoring and assessment of specific risks connected to VLOPs or VLOSEs;
- g. Management and administration⁸, including FTEs assigned to the overall management and support of the supervisory tasks referred to in Article 43(2) of Regulation (EU) 2022/2065.

(10) In accordance with Article 2(2), point (a) of Delegated Regulation (EU) 2023/1127, the unitary cost of personnel is determined based on the average annual costs per FTE. This includes pro-rata average operating expenditure and applicable social contributions related to these human resources. Consequently, the total appropriations are calculated by considering the most recent average costs of personnel as annually set out by DG BUDG in the context of the preparation of the Legislative Financial Statements and charge backs,⁹ including estimated salary increases.

(11) Based on the above, the total annual costs for human resources¹⁰ pursuant to Article 2(2), point (a) of Delegated Regulation (EU) 2023/1127 are estimated as follows:

HR expenditure (270 FTEs)	EUR 34 828 303
----------------------------------	-----------------------

⁷ https://algorithmic-transparency.ec.europa.eu/index_en

⁸ FTEs dedicated to horizontal support activities related to the supervisory tasks referred to in Article 43(2) of Regulation (EU) 2022/2065, including finance, contract management, recruitment, data protection, and internal control.

⁹ Average cost of staff for year 2026 amounts to EUR 197 776 for Officials and Temporary Agents, EUR 106 252 for Contract Agents, and EUR 108 356 for Seconded National Experts. Such figures already include pro-capita average operating expenditure such as building and IT costs ("habillage") but need to be increased by the applicable provision for social contributions (24,2%). After increase, they amount to: EUR 245 638 for Officials and Temporary Agents, EUR 131 965 for Contract Agents, and EUR 134 578 for Seconded National Experts.

¹⁰ While the target staff number for 2026 is set to 270, the estimated associated costs are made on a conservative basis, considering potential cases of staff working only a fraction of the full year in accordance with estimated recruitment patterns.

3. Other administrative and operational expenditure

(12) In accordance with Article 2(2), point (b) of Delegated Regulation (EU) 2023/1127, the estimation should take into account any other expected administrative or operational expenditure in the year n+1 not included in the average costs of personnel which is necessary for the fulfilment of the tasks referred to in Article 43(2) of Regulation (EU) 2022/2065. Such expenditure should take into account the non-exhaustive list of items listed in Annex I to Delegated Regulation (EU) 2023/1127. At the same time, possible changes across different categories of operational expenditures when implementing the budget should be possible, and eventually will be indicated in the ex-post reporting to the European Parliament and the Council pursuant to Article 8 of Delegated Regulation (EU) 2023/1127.

(13) In view of the above, the following elements have been accounted for the estimation:

- a. External experts' contribution, including the contracting of external independent technological experts and consultants to support the Commission in specialised supervisory activities. The projected cost is determined based on the number of external contractors required, their level of expertise, and the estimated time needed to complete their tasks. ~~COB~~;
- b. The expected price of renewal or acquisition of databases, including subscriptions and access to audience and data company databases. Where applicable, those prices are calculated based on the number of user licences dedicated to the supervisory tasks referred to in Article 43(2) of Regulation (EU) 2022/2065;
- c. The projected cost for digital tools, including for purchasing, subscribing, licensing and developing any necessary software or system for data extraction and monitoring; the cost of special IT equipment (e.g. unlocked terminals for access to specific platforms with special, segregated network, security arrangements, enhanced workstations and laptops) and any other computational capability needed for the supervisory tasks referred to in Article 43(2) of Regulation (EU) 2022/2065. These estimates are derived from similar costs already incurred by the Commission.
- d. The prudential estimation of the expenditure for IT systems, including the set-up, acquisition, licensing, subscription, development, maintenance and operation of AGORA and of the database managed by the Commission pursuant to Article 24(5) of Regulation (EU) 2022/2065, as well as other information systems supporting supervisory procedures and information management of the Commission under Section 4 of Chapter IV of Regulation (EU) 2022/2065. The anticipated cost is derived from available quotes and price lists or comparable expenses already incurred by the Commission.
- e. The expected cost for the Board Secretariat, including costs (other than human resources) incurred in the organisation of monthly physical meetings of the Board and its Working Groups pursuant to Article 62 of Regulation (EU) 2022/2065, and corresponding reimbursements for national representatives and related costs. The estimation is based on the average cost per meeting, drawing on experiences from previous exercises.
- f. The estimation of the cost for supervisory missions and expertise-developing missions, including the attendance to conferences related to VLOPs and VLOSEs risks and relevant VLOPs and VLOSEs obligations, calculated based on the average cost per mission, taking into account the insights gained from the previous exercises;

- g. The conservative estimation of expenditure for developing supervisory capabilities, informed by insights gained from previous exercises, including:
- i. the organisation of workshops and conferences connected to the supervisory analysis of risks and other ad-hoc events and the involvement of external independent and globally recognised technological experts and consultants for analysis and assessment of impacts of algorithms, such as recommender systems, content moderation practices and rules, ads selection, and data related practices on selected risks;
 - ii. cooperation agreements with relevant national and supranational public institutions, and other relevant authorities ensuring support in the monitoring and assessment of individual risks;
 - iii. compliance monitoring contracts, including large contracts on specific risks across different designated online platforms and search engines and support contracts for supervisory and enforcement actions, as well as for reviews of documents and evidence.

(14) Based on the above, the total annual costs for other Operational and Administrative expenditure pursuant to Article 2(2), point (b) of Delegated Regulation (EU) 2023/1127 are estimated as follows:

Other operational and administrative expenditure	EUR 19 477 008
External experts	EUR 4 172 000
Databases, Digital tools, and IT systems	EUR 11 638 508
Board Secretariat	EUR 665 000
Missions	EUR 240 000
Supervisory capacity building activities and support	EUR 2 761 500

4. Overall estimation

(15) In accordance with Article 2(3) of Delegated Regulation (EU) 2023/1127, the amount of the overall annual costs estimated for a given year to be charged during the year of estimation, is to be respectively increased or decreased by the amount of deficit or surplus incurred in the previous year, as disclosed in the report referred to in Article 8(4) of that Delegated Regulation. Therefore, the amount of the overall annual costs estimated for 2026 to be charged in 2025 is increased by the amount of incurred deficit for year 2024¹¹.

(16) Based on the above, the estimation provided for in the Commission preparatory document attached to the draft budget pursuant to Article 41(8) of the Financial Regulation is composed as follows:

HR expenditure	EUR 34 828 303
Other operational and administrative expenditure	EUR 19 477 008
(+) Deficit incurred in 2024	EUR 514 061
Total assigned revenues	EUR 54 819 372

¹¹ [COM\(2025\) 150, p. 5](#)

- (17) This total amount has been included as estimated total assigned revenues in the Draft Budget Working Document Part V ('Budget implementation and assigned revenues') accompanying the 2026 Draft Budget pursuant to Article 41(8) of the Financial Regulation as single item of the budget lines group '1.02OTH'¹², aimed at supporting the expenditure line 02.20.03.05 'Digital Services Act (DSA) – Supervision of Very Large Online Platforms' as provided for in the connected document containing the Statement of estimates¹³.

¹² [COM\(2025\) 300, p. 65.](#)

¹³ [SEC\(2025\) 250, p. 76.](#)