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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the EPSCO Council of 17 October 2025: Annual report on simplification, implementation and enforcement <i>- Information from the Commission</i>

Delegations will find attached information from the European Commission, with a view to the meeting of EPSCO Council of 17 October 2025 (Any Other Business item).



2025
ANNUAL PROGRESS REPORT

*Simplification,
Implementation
& Enforcement*

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European Commissioner
for Equality and European Commissioner
for Preparedness and Crisis Management

SEPTEMBER 2025



Introduction

Among the priorities of the 2024-2029 Commission, the President has made a strong commitment towards a simpler and more accessible European administration. The aim is to cut administrative red tape, simplifying legislation and implementation and reduce bureaucratic burdens.

In this framework, I, Hadja Lahbib, the Commissioner for Equality, Preparedness and Crisis Management, am presenting in the first annual progress report on Simplification, Implementation and enforcement. This report covers 1 January – 31 July 2025 and details the measures I have overseen and implemented in collaboration with the Directorate-Generals for European Civil Protection and Humanitarian Aid Operations (DG ECHO), Emergency Preparedness and Response Authority (DG HERA), and, in the Equality policy area, with the Directorate-General for Justice and Consumers (DG JUST).

2. Executive Summary

Under the leadership of the Commissioner for Equality, Preparedness, and Crisis Management, from January to July 2025, significant strides in regulatory simplification and crisis management coordination have been implemented.

With regard to preparedness and crisis management, key achievements include integrating various EU instruments in an all-hazards, whole-of-society and whole-of-government approach through the adoption of the Preparedness Union Strategy. This strategy, along with stress testing of the Emergency Response Coordination Centre and its capacity to manage complex crises, has enhanced the Union Civil Protection Mechanism's crisis response capabilities.

The future/proposed creation of an EU crisis coordination hub, building on the structures and the expertise of the Emergency Response Coordination Centre, will further strengthen EU's operational preparedness. The new EU Medical Countermeasures Strategy is designed to improve access to lifesaving medical tools for European citizens and societies, businesses and economies. Reinforced synergies and collaboration between DG HERA, the European Centre for Disease Prevention and Control and the European Medicines Agency will ensure further efficiency. A comprehensive multi-annual stress-test plan is proposed aiming to enhance legislative efficiency and explore simplification in equality and non-discrimination policies.

The first implementation dialogue with EU humanitarian partners in May 2025 focused on the humanitarian landscape, including the upcoming adoption of a roadmap on localisation, the development of an EU fragility strategy, and enhanced Commission's support for key enabling services.

In the area of equality, a range of workshops and tools have been deployed to assist Member States in transposing important directives, such as the Pay Transparency Directive, with tailored support from entities like the European Institute for Gender Equality. Member States' adherence to crucial directives related to equality and anti-discrimination was prioritised through rigorous enforcement actions (infringement proceedings, handling citizens' complaints, petitions and monitoring the implementation of the CJEU judgments).

Through these initiatives, the objective is to maintain a strong commitment to equality, humanitarian aid, and crisis preparedness, building a resilient and cohesive Europe.

3. Delivering Results: Key Measures

A. Simplification and stress tests

Any country hit by a disaster, in Europe and beyond, can request emergency assistance through the Union Civil Protection Mechanism (UCPM). This mechanism aims to strengthen cooperation and facilitate coordination between the European Union (EU) and its Member States in the field of civil protection. Its goal is to prevent, prepare for, and respond to natural hazards and human-induced disasters both within and outside the EU. To keep the UCPM effective

and aligned with the findings of its UCPM evaluation¹, and in line with the objectives of the Preparedness Union Strategy², services under my responsibility are implementing a range of activities, including simulation exercises and 'stress testing' of emergency response and crisis centres across the EU.

In order to test the EU's preparedness and ability to respond to complex crises of a hybrid nature, DG ECHO coordinates the EU Integrated Resolve exercise, conducted as part of the EU-NATO Parallel and Coordinated Exercise (PACE). The exercise aims at stress testing the EU's overall **preparedness and capacity to manage complex crises**. The Final Exercise Report of the most recent edition (EU Integrated Resolve 2024) was approved by Council in June 2025³.

The lessons learned exercise outlined the need to significantly strengthen the EU's ability to respond to potential hybrid crises, both inside and outside the EU. It confirms the Emergency Response Coordination Centre (ERCC) - established under Article 7 of [Decision No 1313/2013/EU](#) - as central to better, faster and more efficient crises coordination. It highlights also a need for improved cross-sectoral awareness in emergency response challenging coordination at EU level. While crisis management remains primarily the responsibility of Member States, it also confirms the necessity and added value of coordinating political and operational responses at Union level to make the system more efficient.

In addition, the Preparedness Union Strategy, published in March 2025, integrated key recommendations of the lessons learned exercise and proposed the creation of an EU crisis coordination hub, building upon the structures and the expertise of the ERCC. The hub will focus on anticipating and managing the consequences of crises with an impact across sectors.

The UCPM has a long-running Lessons Learned Programme (LLP) allowing EU Member States and UCPM Participating States to collectively reflect on experiences with UCPM activations, identifying areas for improvement in the field of response, preparedness, and prevention. Due to the number of UCPM activations and their nature (e.g. wildfires, floods, earthquakes, consular evacuation, support for Ukraine, health emergencies etc.) lessons learned are continuously used to identify and implement new prevention and preparedness activities to support Member States. Measures include the successful initiative to preposition firefighters and increase the number of aerial forest fire fighting capacities of rescEU before the start of Europe's wildfire season, to enhance Europe's readiness to combat wildfires in the most efficient way by simplifying communication between the teams and response during the actual fires.

The EU Stockpiling Strategy, announced as part of the Preparedness Union Strategy and adopted in July 2025, consolidates all existing sectorial stockpiling efforts to enhance access to essential goods across the EU. By combining centralised EU-level reserves with Member States' contributions and leveraging public-private partnerships, the Strategy aims to ensure efficiency, scalability and cost-effectiveness. The Stockpiling Strategy exemplifies efforts to find synergies and streamline processes.

Following the [recommendation from the European Court of Auditors](#) to clarify the respective responsibilities, and the [HERA Review's](#) call for reinforced synergies within the Commission and with relevant EU agencies, DG HERA is collaborating with the European Centre for Disease Prevention and Control (ECDC) and the European Medicines Agency (EMA) to ensure efficiency of the current division of responsibilities. Supported by the Directorate-General for Justice and Consumers (DG JUST), I have proposed a comprehensive multi-annual stress-test approach to enhance our legislative framework. Together with the Director-General, we are jointly exploring future simplification proposals and assessing the potential for simplification in the **equality and non-discrimination policy area**. The body of EU acts on equality and non-discrimination includes empowerment provisions for the Commission to adopt delegated and implementing acts. DG JUST plans to use 4 empowerments in 2025-2026, ensuring legislation

¹ https://civil-protection-humanitarian-aid.ec.europa.eu/news-stories/news/evaluation-eu-civil-protection-mechanism-shows-need-more-integrated-crisis-management-2024-05-29_en

² https://ec.europa.eu/commission/presscorner/detail/en/ip_25_856

³ <https://www.consilium.europa.eu/en/press/press-releases/2024/10/25/eu-integrated-resolve-2024-eu-concludes-wide-crisis-response-exercise/>

remains streamlined and efficiently implemented. Following a thorough assessment of these acts, no legislative acts were deprioritised, reflecting their continued strategic relevance.

Through these concerted efforts, the European Commission is committed to advancing legislative efficiency, enhancing crisis response coordination, and simplifying policy execution—ensuring a resilient and robust framework across the EU.

B. Implementation

My first [implementation dialogue](#) held in Brussels on 21 May 2025 on the humanitarian landscape together with EU Humanitarian partners encompassed the pressing concern of global funding cuts to humanitarian aid, and the resulting uncertainty in times when principled humanitarian action is needed the most. I paid particular attention to the implementation and simplification of the policy areas of the humanitarian reset/reform, fragility, localisation and equitable partnerships, and International Humanitarian Law (IHL) violations.

Partners stressed the urgency of focusing efforts on the **implementation of the humanitarian reform**, including the proposed simplification and cooperation on humanitarian aid delivery, cluster approach, as well as the prioritisation of certain areas for humanitarian funding, and the need to rethink and reset the humanitarian aid architecture. The partners delved into the issues raised by **fragility, localisation**, and raised **concerns about continuous breaches and systematic violation of IHL** and emphasised the need for stronger EU position and protection of IHL. The discussion further highlighted the challenges of disinformation, promoting data collection and visibility, while emphasising the importance of sharing positive narratives in relation to successful diplomatic efforts. Against this background, I reaffirmed the EU's steadfast dedication to humanitarian principles, advocating for the formulation of robust strategies in collaboration with partners. The dialogue outlined proposed **deliverables and next steps to be done by the Commission**, including the **upcoming adoption of a roadmap on localisation, the development of a fragility strategy**, and **enhanced Commission support for key enabling services** such as data collection and needs assessment.

Similarly, the Commission adopted the [EU Strategy to support medical countermeasures against public health threats](#) on 9 July. The strategy seeks to accelerate the development, production, deployment, and accessibility of lifesaving medical tools. This will be achieved by stimulating and fostering innovation in medical countermeasures, ensuring a comprehensive end-to-end approach, driving joint priority setting, scaling up public-private partnerships, and enhancing cross-sectoral collaboration, including civil-military cooperation.

To best leverage the potential of the EU budget to expedite the development of medical countermeasures, the Strategy proposed a Medical Countermeasures Accelerator, an integrated and simplified framework to support innovators throughout the development cycle, from research to market entry.

As stated in the Strategy, the Commission will consider and, if appropriate, propose a revision of the 2014 Joint Procurement Agreement for medical countermeasures to align with the revised Financial Regulation and to make it better fit for today's needs. The work to develop Guidelines for Crisis Procurement of Medical Countermeasures will support and guide Member States' actions in case of crisis. The Commission will, in cooperation with Member States, develop standardised procedures for sharing agreements with global partners, building on lessons-learned from the recent successful response to the mpox outbreak in the Great Lakes Region of Africa, using a Team Europe's approach.

Other planned outputs that will support implementation in times of health emergency will include the prepositioning of key medical countermeasures, an assessment of feasibility of a shelf-life extension programme and a compendium of medical countermeasures to be stockpiled.

With the support of DG JUST, I have taken forward efforts to strengthen cooperation with Member States and stakeholders to facilitate and streamline the implementation of EU law.

DG JUST is systematically in contact with central coordination authorities for enforcement in the Member States, to discuss best practices and bottlenecks in communication and enforcement's handling. Moreover, DG JUST is making extensive use of implementation tools in the context of the transposition of several directives. In this context, an expert group meeting and workshops with Member States (one in March 2025) were held and an online IT tool (a

Wiki collaborative space) was built to allow for exchanges, sharing of good practices, Q&A between Member States and the Commission, for the [Directive on standards for equality bodies in the field of equal treatment and opportunities between women and men in matters of employment and occupation](#) and the [Council Directive \(EU\) 2024/1499 on standards for equality bodies](#).

Further, the Commission gathered several guidance documents from key stakeholders and shared them with Member States, with the aim to strengthen administrative capacities of equality bodies on the implications of AI technologies in the operations of public administrations and their readiness to supervise them. The Commission is supporting Belgium, Finland and Portugal through a project focusing on [upholding equality and non-discrimination by Equality Bodies regarding the use of artificial intelligence \(AI\) in public administration](#), funded under the [Technical Support Instrument \(TSI\)](#)⁴.

During the reference period, implementation workshops on the [Pay Transparency Directive 2023/970](#) were conducted for Member States in April and September 2025. These workshops also included EU-level umbrella organisations representing social partners and other stakeholders. Member States are required to transpose the Directive by 7 June 2026. To aid employers in applying the Directive, the Commission has enlisted the European Institute for Gender Equality (EIGE) to create a user-friendly toolkit for gender-neutral job evaluation systems. This toolkit is being developed in consultation with Member States and social partners and is set for publication in 2026.

The first transposition workshop for the [Directive on combating violence against women and domestic violence](#) was held on 22 May 2025 and a second one in October 2025. In parallel, the Commission is coordinating the implementation of the Council of Europe Convention on preventing and combating violence against women and domestic violence (the "Istanbul Convention") in the EU's institutions and bodies. The Commission adopted in April 2025 a Communication outlining the process it envisages to apply for developing the EU report on the implementation of the Istanbul Convention as part of the EU's baseline evaluation by GREVIO, the Convention's monitoring body⁵. The EU report will have to be submitted by end November to the Council of Europe.

In 2025, the Commission set up an expert group composed of representatives of Member States, to discuss matters related to the transposition of the [Directive establishing the European Disability Card and the European Parking Card for persons with disabilities](#), as well as the delegated acts that the Commission is required to adopt by 5 December 2025. The expert group met twice (on 19 May and 10 July 2025). Consultations with organisations of persons with disabilities on the preparation of the delegated acts also took place. For the transposition of the [Directive on the accessibility requirements for products and services](#), in 2025 my services continued holding informal meetings with the national contact points (on 21 January 2025 and 25 June 2025) to discuss matters related to the transposition and implementation of the Directive, and organised bilateral meetings with some Member States, to address some country-specific issues.

C. Enforcement⁶

In the area of equality and non-discrimination, in the first half of 2025, my services have monitored the implementation of EU law and pursued, as a matter of priority, possible infringements related to recently adopted EU measures that increase the competitiveness of the EU Single Market.

The [Europa webpage on infringements, pre-infringement dialogues and transposition](#) provides up-to-date statistical information on the Commission's enforcement activities and Member States' compliance with EU law, including trends per policy area, topic and Member State.

In the area of disability, the Commission sent a reasoned opinion to [Greece](#) due to some persisting gaps in the transposition of the European Accessibility Act ([Directive \(EU\) 2019/882](#)) and closed the non-communication

⁴ https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/technical-support-instrument/technical-support-instrument-tsi_en

⁵ COM(2025) 172 final of 10.4.2025; [EUR-Lex - 52025DC0172 - EN - EUR-Lex](#)

⁶ Enforcement of EU rules is only relevant for portfolios with legislative acquis. As this is not the case for Preparedness and Crisis Management, this section focuses on the enforcement of the equality and non-discrimination acquis.

infringements against [Ireland, Malta, Romania, Luxembourg, Spain and Portugal](#). Infringement proceedings are currently open against [21 Member States](#) for failure to transpose the European Accessibility Act.

In the first half of 2025, my services received two citizens' complaints as regards the European Accessibility Act, in addition to 9 complaints related to the United Nations Convention for the Rights of Persons with Disabilities. In 2025, the Commission received one [petition](#) focusing on the European Accessibility Act, to which a written reply was issued in July. Another four petitions were submitted referencing the United Nations Convention for the Rights of Persons with Disabilities. The Commission maintained a constructive exchange with the European Parliament in the context of petitions submitted by citizens in relation to the Employment Equality Directive ([Council Directive 2000/78/EC](#)). The Commission intervened orally at the PETI Committee in March 2025 (on a case concerning Cyprus) as well as issued written replies in May and June 2025 (respectively, concerning Italy and the aforementioned case concerning Cyprus).

Under the umbrella of non-discrimination, my services received 19 complaints on the Racial Equality Directive ([Council Directive 2000/43/EC](#)) and 16 complaints on the Employment Equality Directive ([Council Directive 2000/78/EC](#)).

In the area of gender equality, the Commission opened, in January 2025, infringement procedures against [17 Member States](#) for failing to transpose [Directive 2022/2381 on improving the gender balance among directors of listed companies and related measures](#).

For the [Directive on Work-life balance](#) there are [three ongoing cases before the Court of Justice](#) for the lack of notification of full transposition against Ireland, Spain, and Belgium, which were initiated in November 2023. While Ireland and Belgium have notified full transposition in the meantime, full transposition is still outstanding for Spain.

The Commission worked on five [petitions](#) from previous years concerning, respectively, the directives on Violence against Women/Istanbul Convention, Work-Life Balance, gender equality in social security, maternity leave and gender equality in employment and occupation. While no new [petitions](#) were received in the first half of 2025, the Commission did receive 64 complaints. The biggest share of complaints concerned the work-life balance Directive (29), followed by the Violence against women Directive/Istanbul Convention (21) and the Directive on gender equality in employment and occupation (10).

The Commission also monitor Spain's implementation of the [CJEU judgment in Case C-623/23](#) of 15 May 2025 concerning Directive 79/7/EEC on gender equality in social security, in which the Court held that the Spanish law setting eligibility conditions for a pension supplement constitutes direct discrimination on the grounds of sex, as men may be in a situation comparable to that of women.

Finally, the Commission closed an infringement case against [Belgium](#) in May 2025, for non-conformity with [Directive 2006/54/EC \(recast\) on the principle of equal treatment of men and women in employment and occupation](#), following the adoption of a national legislation in line with the Directive.

4. Way forward

This section outlines areas of focus for additional simplification and implementation efforts. Alongside these initiatives, a continued resolute enforcement action to defend EU rules on equality and non-discrimination is essential. This commitment ensures that existing regulations are upheld effectively.

In our humanitarian efforts, I am spearheading a revision of the partnership framework with EU humanitarian NGOs, known as 'certification.' The revision process, starting in 2025 and aligned with the Multiannual Financial Framework (MFF) 2028-2034, aims to streamline administrative requirements while ensuring these partnerships adhere to our essential regulations and international standards. By simplifying the certification process, we will enhance the efficiency and efficacy of our humanitarian collaborations. My service has already begun actively engaging with our NGO humanitarian partners. The first interaction took place in March 2025 and further consultations are foreseen.

Additionally, I am pleased to share that Commission proposal on the Union Civil Protection Mechanism and Union support for health emergency preparedness - adopted in July 2025 - will introduce significant legal framework improvements. Key enhancements include centralising risk reporting to foster operational clarity and efficiency,

allowing Member States and the Commission to respond more effectively. By unifying response protocols and simplifying co-financing rates, we will reduce administrative burdens and optimise our operational readiness.

Through these comprehensive initiatives, we aim to strengthen our commitment to equality, humanitarian aid, and crisis preparedness, ensuring a resilient and cohesive Europe.

Finally, in November 2025, I will host my second implementation dialogue centred on the EU Roma Strategic Framework and Member States' national Roma strategies. Our focus on these dialogues reinforces our commitment to fostering Roma equality, inclusion, and participation throughout Europe.

Annex: examples

I am sharing four examples of simplification and implementation results, outlining practical improvements for our citizens ultimately in the areas of equal pay, civil protection, and health emergency preparedness.

Equal Pay and Pay Transparency. To assist Member States and employers with the implementation of the Pay Transparency Directive and adhering to the Treaty-based principles of equal pay, the EU has developed tools and methodologies with partners like the ILO and OECD. Notably, the Commission, in collaboration with the European Institute for Gender Equality (EIGE), is preparing a step-by-step toolkit for gender-neutral job evaluation, available by 2026. This toolkit specifically targets micro, small, and medium-sized enterprises. Additionally, the Commission has funded national-level projects through the gender equality call for proposals under the Citizens, Equality, Rights and Values programme, with a new call planned for 2026–2027 focusing on pay transparency and equal pay compliance.

Integration of Civil Protection and Health Preparedness: Merging civil protection and health emergency funding under a unified programme streamlines operations and minimises administrative burdens. This integration, a natural progression highlighted by the COVID-19 pandemic's lessons, enhances the effectiveness of EU funding by reducing gaps and overlaps and boosting coordination efficiency within the Union Civil Protection Mechanism (UCPM).

Collaboration through Memoranda of Understanding DG HERA, mandated to closely collaborate with EU health agencies like ECDC and EMA, signed memoranda of understanding on 14 March 2023. These agreements establish coordination mechanisms to ensure swift EU responses to health emergencies, facilitated by regular senior management exchanges and designated single points of contact who communicate bi-weekly and as needed for enhanced cooperation.

Facing challenges from funding shortfalls, US cuts, disrupted supply chains, and increased risks, humanitarian partners struggle in crisis management. In response, **the Commission/DG ECHO quickly adapted to maintain support for crucial services** like data provision, security, flights, and logistics. [A Guidance Note on Flexible Funding Measures \(March 2025\)](#)⁷ offers partners **flexible options** and increased pre-financing to ease cash flow issues. The Commission continues engaging with key partners through multiyear programmes prioritising prevention of IHL violence, coordination and local actor support, streamlining administration with single global contracts, providing predictability, and simplifying reporting.

⁷ [DGEcho WebSite](#), under Humanitarian Aid Model Grant Agreement section