

Questionnaire results on the independence of EU-empowered independent
administrative authorities in Member States

ERC EUDAIMONIA

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Background: The analysis carried out in WP1 of the ERC project showed that the EU legislator requires Member States to adopt independent administrative authorities to monitor and enforce obligations arising out of EU secondary law. When that is the case, EU law itself directly impacts on the ways in which Member States' administrations have to be organized. The extent to which independence plays out – full autonomy vs simple deference – remains however without substantial doctrinal or empirical appraisal as do the ways in which Member States' authorities engage with EU law-required independence to structure themselves differently from other Member State administrative structures and to assert their atypical status within a Member State's administration. We therefore targeted officials from these bodies to express their views on the various facets of independence and their engagement with EU law in that regard. This insider's view, taken together with the rest of the work carried out during the project, will bring a welcome addition to the arguments addressed in WP1 and will help us frame a broader argument about national institutional autonomy in the EU.

Questionnaire: At the outset and through snowballing, the research team identified ca. 2000 officials working in the sectors of competition, data protection, electronic communications, energy, railways and prudential financial supervisions. The targeted officials are working on the management of their organization, and deal with the monitoring and enforcement of the mentioned public policies. 1709 personal email addresses were found and constituted the publicly identifiable population, out of which 228 responded to our questionnaire (response rate: 13,3%). The questionnaire consisted of a series of 10 questions displayed below, and allowed officials to express their feelings qualitatively to substantiate their answers.

Population: 228 respondents out of 26 Member States responded to our questionnaire. 49 officials work in the field of competition, 30 officials work in the field of data protection, 43 officials work in the field of electronic communications, 43 officials work in the field of energy, 30 officials work in the field of railways and 30 officials work in the field of prudential financial supervision.

The questionnaire also wanted to compare cross-country differences between Member States. The number of responses received is not however sufficient to generalize about all of them. For the present analysis, we selected the Member States that received at

least 12 responses from officials. 6 Member States were thus selected: Austria (n=15), Croatia (n=12), Germany (n=15), Finland (n=18), Latvia (n=20) and Luxembourg (n=14).

Visuals: Aggregate numbers for the whole sample are represented in pie charts. The breakdown by Member State and by policy area are represented in bar charts (green: strongly agree; yellow: somewhat agree; orange: somewhat disagree; red: strongly disagree).

Comments: Respondents had the possibility to comment on their answers. This qualitative part of the survey allowed for a deeper understanding of the reasons underlying the choice for the survey. The comments will be included at the end of every subsection and are coded as follows: each respondent is associated to a country code and a personal identifying number. Country codes here are : AT (Austria), BE (Belgium), BG (Bulgaria), CRO (Croatia), CZ (Czech Republic), DE (Germany), DK (Denmark), EST (Estonia), FIN (Finland), FR (France), GRE (Greece), HUN (Hungary), IRE (Ireland), IT (Italy), LAT (Latvia), LIT(Lithuania), LUX (Luxembourg), MAL (Malta), NL (Netherlands), POL (Poland), POR (Portugal), RO (Romania), SLO (Slovenia), SPA (Spain), SVK (Slovakia) SWE (Sweden). The reactions from all respondents of survey were included, and or not limited to the 6 Member States chosen for the quantitative results. The questionnaire was drafted in 20 EU official languages. The comments were translated into English.

Caveats: The questionnaire gathers perceptions about the role of EU law in national institutional matters. Some discrepancies could be found between the answer made in the questionnaire and the qualitative answer given afterwards. Some identified respondents pertain to the authorities and services related to the 6 policy areas chosen for the questionnaire, but are specialised in adjacent areas (e.g. postal services for the utilities regulator). These respondents, which answered “other” when asked to identify their policy area, were excluded from the quantitative part of the analysis, but their qualitative answers are reproduced in this summary.

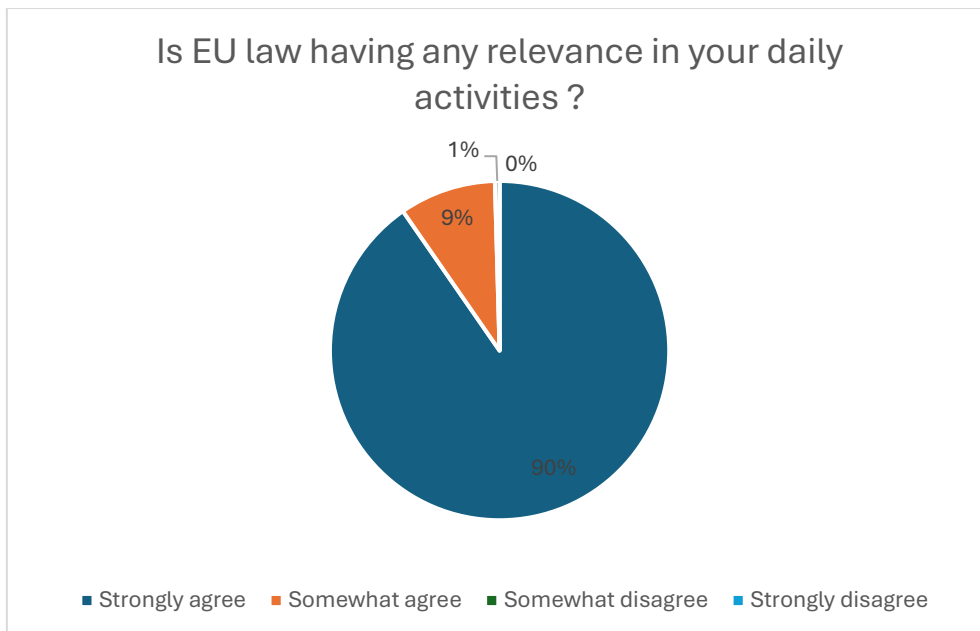
Annexes: The annexes include all the individual responses in the 20 language versions of the questionnaire, allowing for the replicability of the investigation.

1) Is EU law having any relevance in your daily activities ?

The purpose of this question was to assess the impact of EU law on the activities of targeted civil servants. The qualitative part wanted to assess whether respondents felt that EU substantive law played a role on the content of their activities, but also if it led to new procedural and administrative habits.

a) Aggregates

Strongly agree	206
Somewhat agree	21
Somewhat disagree	1
Strongly disagree	0
TOTAL	228

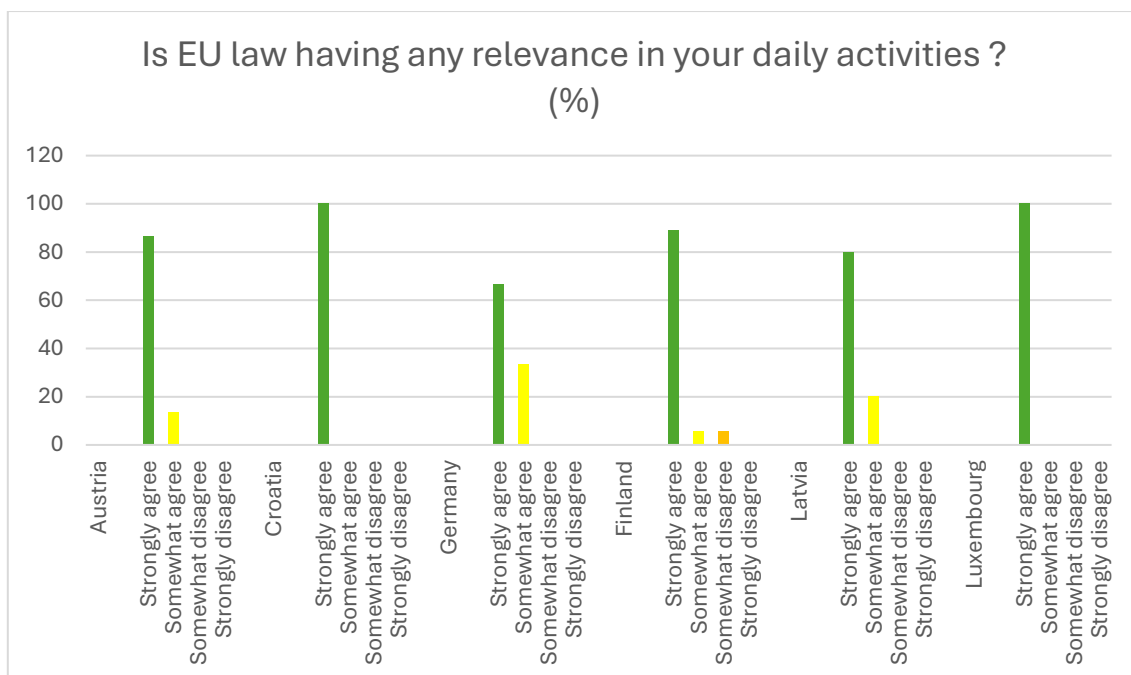


b) Breakdown by Member State (in percentages)

The results are expressed in percentages per country. It should be read as follows: 86,667% of respondents from Austria strongly agree that EU law having any relevance in their daily activities, whereas 13,33% from Austria only somewhat agree with that statement.

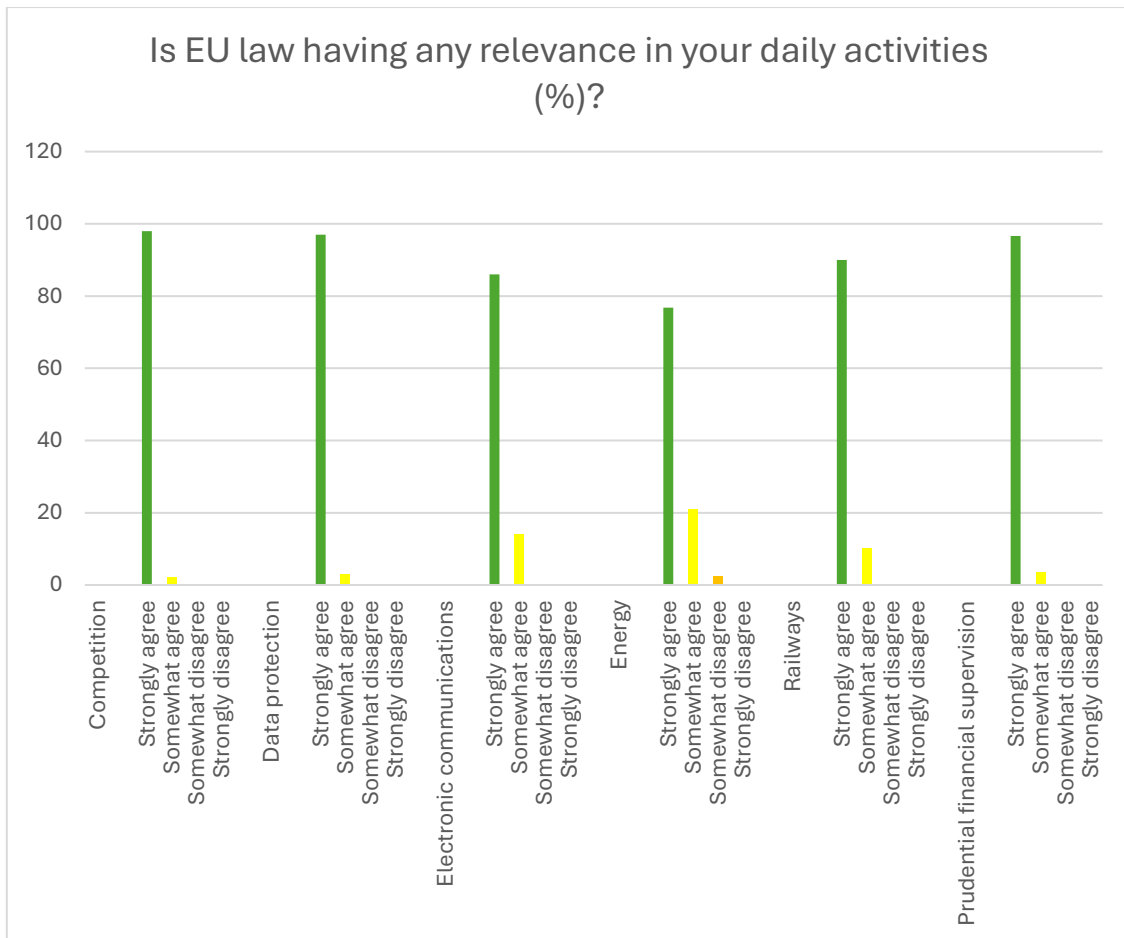
The results are displayed in a table and in a bar chart (in %) in order to allow for continuities or discrepancies across Member States and/or policy areas.

Austria	
Strongly agree	86,66666667
Somewhat agree	13,33333333
Somewhat disagree	0
Strongly disagree	0
Croatia	
Strongly agree	100
Somewhat agree	0
Somewhat disagree	0
Strongly disagree	0
Germany	
Strongly agree	66,66666667
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	0
Finland	
Strongly agree	88,88888889
Somewhat agree	5,55555556
Somewhat disagree	5,55555556
Strongly disagree	0
Latvia	
Strongly agree	80
Somewhat agree	20
Somewhat disagree	0
Strongly disagree	0
Luxembourg	
Strongly agree	100
Somewhat agree	0
Somewhat disagree	0
Strongly disagree	0



c) Breakdown by policy area

Competition	
Strongly agree	97,95918367
Somewhat agree	2,040816327
Somewhat disagree	0
Strongly disagree	0
Data protection	
Strongly agree	96,96969697
Somewhat agree	3,03030303
Somewhat disagree	0
Strongly disagree	0
Electronic communications	
Strongly agree	86,04651163
Somewhat agree	13,95348837
Somewhat disagree	0
Strongly disagree	0
Energy	
Strongly agree	76,74418605
Somewhat agree	20,93023256
Somewhat disagree	2,325581395
Strongly disagree	0
Railways	
Strongly agree	90
Somewhat agree	10
Somewhat disagree	
Strongly disagree	
Prudential financial supervision	
Strongly agree	96,66666667
Somewhat agree	3,333333333
Somewhat disagree	0
Strongly disagree	0



d) Comments

- AT1: “Telecom Act is based on EU law, several EU regulations directly apply”.
- AT2: “Direct and indirect application of EU legal acts”.
- AT6: “In particular, the EEC is highly relevant to my activities.”
- AT10: “The ADR/NEB is responsible for enforcing EU Regulations in the field of passenger rights.”
- AT11: “We act as both the dispute resolution and enforcement body for two EU Regulations.”
- BE1: “I apply EU law on a daily basis”.
- BE2: “European law plays a significant role in shaping the activities of CREG, as it provides a foundational legal framework alongside Belgian law. As an energy regulatory authority, CREG must ensure that its decisions and practices comply with both national and EU regulations. The EU's evolving legal landscape, including its focus on climate change, energy security, and market integration, directly influences CREG's regulatory measures and its alignment with broader European objectives. Furthermore, European law has increasingly expanded

CREG's competencies. This growth in responsibilities has necessitated adaptations in terms of personnel, budget, and operational capacity to effectively meet these new challenges and ensure full compliance with EU requirements."

- BE4: "As a central bank responsible for prudential supervision and safeguarding financial stability, we operate within an international and European legal framework. The Treaty and various Regulations and Directives form the basis of our work."
- BE5: "It has a significant impact on our day-to-day work."
- BG1: "The Bulgarian Commission on Protection of Competition applies Art. 101 and 102 TFEU as well as the cooperation with regard to this envisaged in Regulation 1/2003."
- CRO5: "European legislation – Regulations and Directives – has been implemented into our national legal framework and, as such, influences our decisions and other acts."
- CZ1: "Our institution works in the field of energy and we have to monitor the implementation of the European law into the Czech law landscape. Therefore, the EU law strongly influences our daily activities."
- CZ2: "GDPR"
- DE3: "General Data Protection Regulation (GDPR), EU digital legislation."
- DE4: "Application of EU primary law, in particular Articles 101 and 102 TFEU."
- DE6: "In the energy sector, many legal rules are shaped by EU law, while the detailed provisions are laid down in German legislation. Some of the European rules are well designed and highly useful, whereas others are of questionable quality and effectiveness."
- DE7: "The area of public security is only partially regulated by EU law and is predominantly governed by national legislation. Furthermore, bodies such as BEREK are generally not concerned with issues of this nature. Nevertheless, there are substantial overlaps in substantive law, for example with regard to the legal classification and definition of what constitutes an electronic communications service."
- DE9: "The regulation of electricity and gas networks is to a large extent based on EU Directives, Regulations and Network Codes."
- DE11: "The majority of financial market regulation is shaped by European law (through Directives and Regulations). Only a few limited areas are regulated exclusively under national law."
- DE12: "Regulation (EU) No 1227/2011, together with national provisions under German law and other EU regulations applicable to energy markets, forms the basis for our supervision of wholesale energy markets."
- DE13: "There are specific provisions on charges and fees in the EU Regulations that must be observed."

- DE14: “The implementation of European rules into German law takes up the largest part of my work.”
- DE15: “Implementation of RED III and the EU Net-Zero Industry Act.”
- DK2: “Of course, all railway technical aspects are considered within the framework of EU Directives and standards, but there are also issues where national policy frameworks must be taken into account.”
- EST1: “Daily activities are guided by national legislation, which is largely aligned with EU legislation.”
- EST2: “I work in the field of insolvency, and EU directives are particularly important in this area.”
- EST6: “Implementation of directly applicable EU railway legislation (regulations and decisions) within the railway system.”
- EST7: “The foundational legal act for my area of work is the GDPR and other EU legal acts concerning the protection of personal data.”
- EST8: “Art. 103[2] of the EEC provides that NRAs shall ensure that end-users have access free of charge to at least one independent comparison tool.”
- EST9: “We are a supervisory authority and ensure compliance with the GDPR and other regulations.”
- EST11: “The main legal act governing the field is the General Data Protection Regulation (EU) 2016/679.”
- EST12: “One of my work responsibilities arises directly from an EU directive that we are required to implement.”
- FIN2: “Most of the regulations we are supervising/following come from EU”
- FIN7: “Competition law and competition rules are largely harmonised at the EU level, with close cooperation between the EU institutions and the National Competition Authorities (NCAs).”
- FIN8: “In a significant number of decisions, Articles 101 and 102 TFEU are applied. Subject to certain conditions being met, cases may be transferred between the competition authorities of the Member States and the European Commission. Cooperation with the competition authorities of the Member States is otherwise also close within the ECN network.”
- FIN9: “There is still relatively limited EU-level legal guidance available in the area of anti-money laundering. Data protection aspects must also be assessed in certain situations.”
- FIN12: “My daily work is mainly related to EU energy regulation and related supervision.”
- FIN13: “My tasks are largely related to the implementation of EU energy market legislation.”
- FIN18: “All regulation within my area of responsibility is based on EU regulation.”
- FRA1: “A large part of energy law is derived from EU legislation (I work for a regulatory authority). In addition, the development of interconnections gives rise

to significant issues relating, on the one hand, to market coupling and, on the other, to the operation of those interconnections.”

- FRA3: “The legal framework governing electronic communications is derived primarily from the EU regulatory framework for the sector, in particular Directive (EU) 2018/1972 (the European Electronic Communications Code).”
- GRE1: “EU competition law”.
- GRE2: “We directly apply articles of the TFEU (apart from regulations and national legislation transposing EU directives”.
- GRE3: “EU Competition law is applied by Greek Competition Commission”.
- HUN2: “National competition authorities also apply EU law (primarily Articles 101 and 102 TFEU, as well as merger control rules). In our proceedings, the practices of the European Commission and the judgments of the Court are important from a case-law perspective; we incorporate them into our own decisions and refer to them.”
- HUN3: “GDPR, LED”.
- HUN5: “GDPR, CJEU case law.”
- HUN6: “National competition authorities also apply Articles 101 and 102 TFEU, meaning that in my day-to-day work I am also involved in the enforcement of the TFEU.”
- IRE1: “The CCPC is responsible for the enforcement of Articles 101 and 102 TFEU”.
- IRE3: “The CCPC is responsible for the enforcement of EU and Irish competition in Ireland”.
- IT1: “Most legislation we enforce has EU origin; even at national level, EU rules have an impact”.
- IT3: “The regulation governing access to infrastructure is based on European Union Directives.”
- IT4: “EU law and the activities of the Union institutions, above all those of the Court of Justice of the European Union, are fully relevant to the performance of institutional tasks.”
- LAT6: “Data protection is regulated by GDPR”
- LAT14: “To the extent that it relates to matters suitable for communication.”
- LIT3: “The relevant Directives are transposed into national law, while Regulations apply directly.”
- LUX2: “The Competition Authority is also the Digital Services Coordinator in accordance with the DSA in Luxembourg. It then relies on the Digital Services Act.”
- LUX10: “Supervisory authority.”
- LUX14: “As a national competition authority (NCA), and since the major reform of the enforcement of EU competition rules in 2004, we have been pursuing, at national level, any infringement of Articles 101 and 102 TFEU. The European Commission is no longer solely responsible for ensuring compliance with Articles 101 and 102 TFEU (formerly Articles 81 and 82 EC Treaty).”

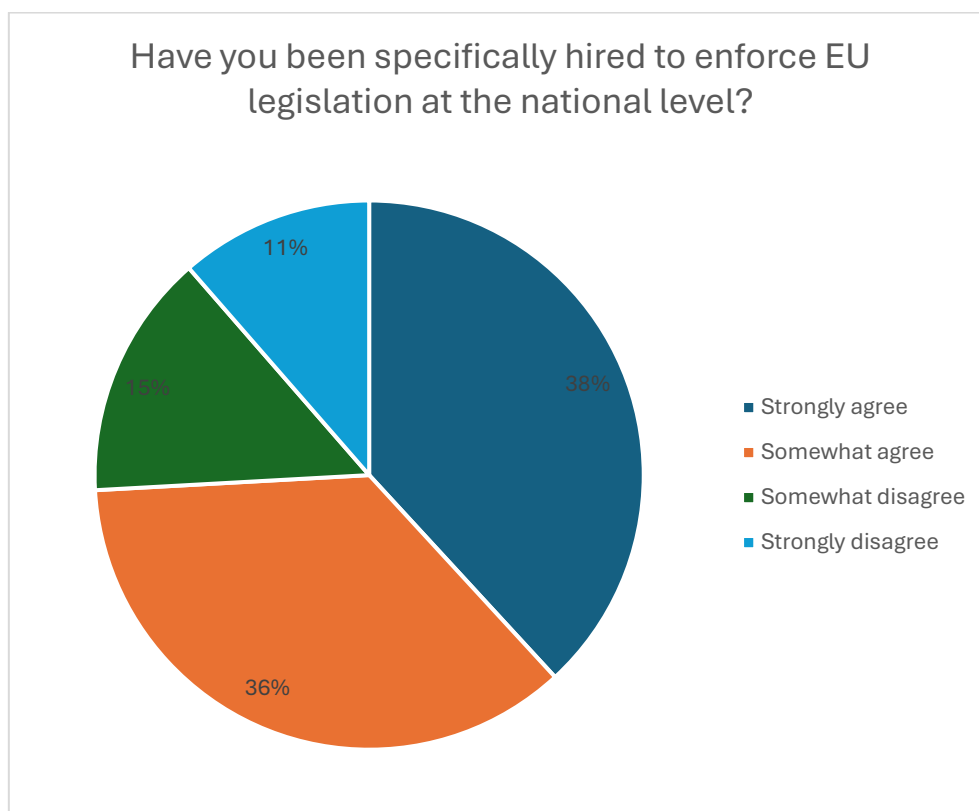
- POL5: “Prudential supervision includes assessing whether financial institutions comply with the applicable legal standards. Since these standards are largely harmonised at the EU level, EU legislation plays a key role in my work.”
- POL7: “It defines and regulates my professional activities.”
- RO1: “TFEU 101, 102”.
- RO3: “The activities of the central bank are harmonised with EU legislation.”
- RO4: “The regulatory activities of the National Energy Regulatory Authority are carried out on the basis of Law No. 123/2012 on Electricity and Natural Gas and Law No. 160/2012 on the Organisation and Functioning of the National Energy Regulatory Authority. These laws transpose into national legislation the provisions of the European regulatory framework governing the internal energy market.”
- SPA1: “We oversee the implementation of regulations from the perspective of conduct and the protection of financial customers.”
- SPA2: “In the audiovisual sector, Directive 2010/13 is of fundamental importance. Coordination among Member States is also essential, not least because of the Country of Origin Principle.”
- SWE2: “The majority of financial regulation originates from the EU. Our authority participates in numerous working groups that develop drafts of new legislation.”
- SWE4: “I mainly work with the DORA regulations.”
- SWE6: “A significant part of the regulation supervised by the authority originates from EU law. In addition, the authority actively participates in work carried out together with European authorities and thereby also influences the content of EU law.”
- SWE7: “The area of professional road transport is largely regulated by EU regulations and EU directives.”

2) Have you been specifically hired to enforce EU legislation at the national level?

The purpose of this question was to assess the structuring affect EU law could play in orientating the choices made by national administrations in the design of their staff.

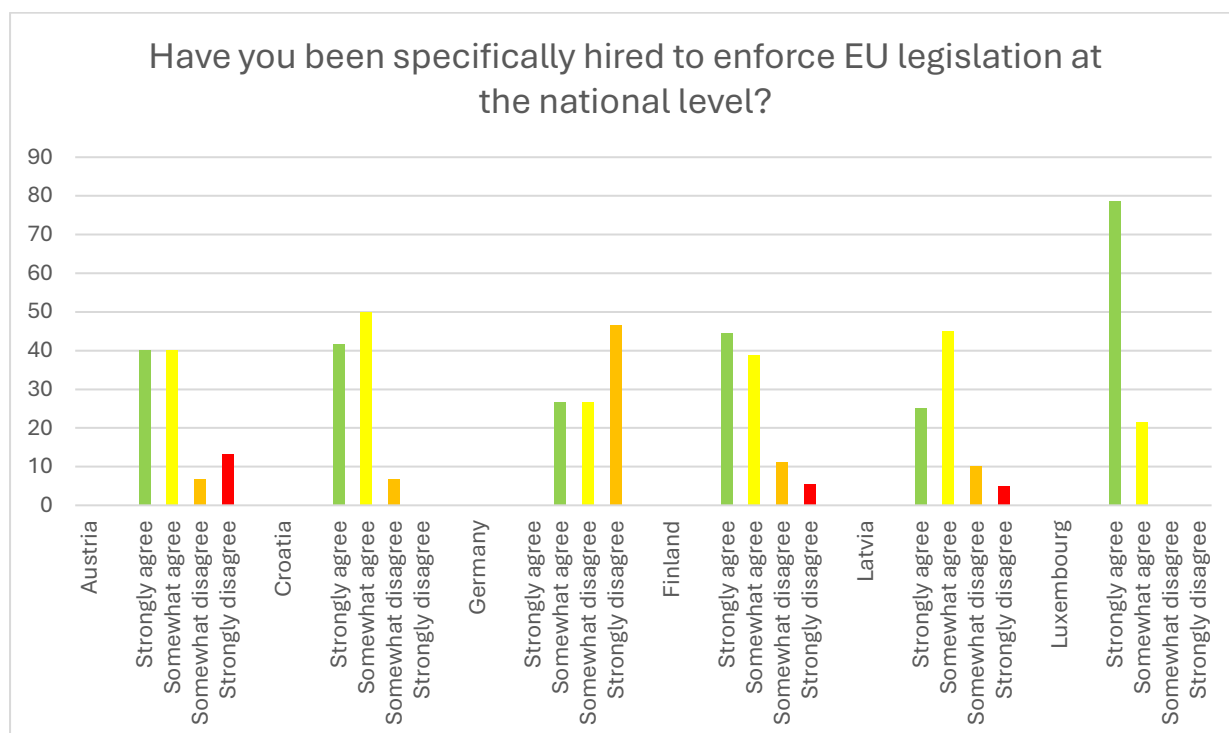
a) Aggregates

Strongly agree	87
Somewhat agree	82
Somewhat disagree	33
Strongly disagree	26
TOTAL	228



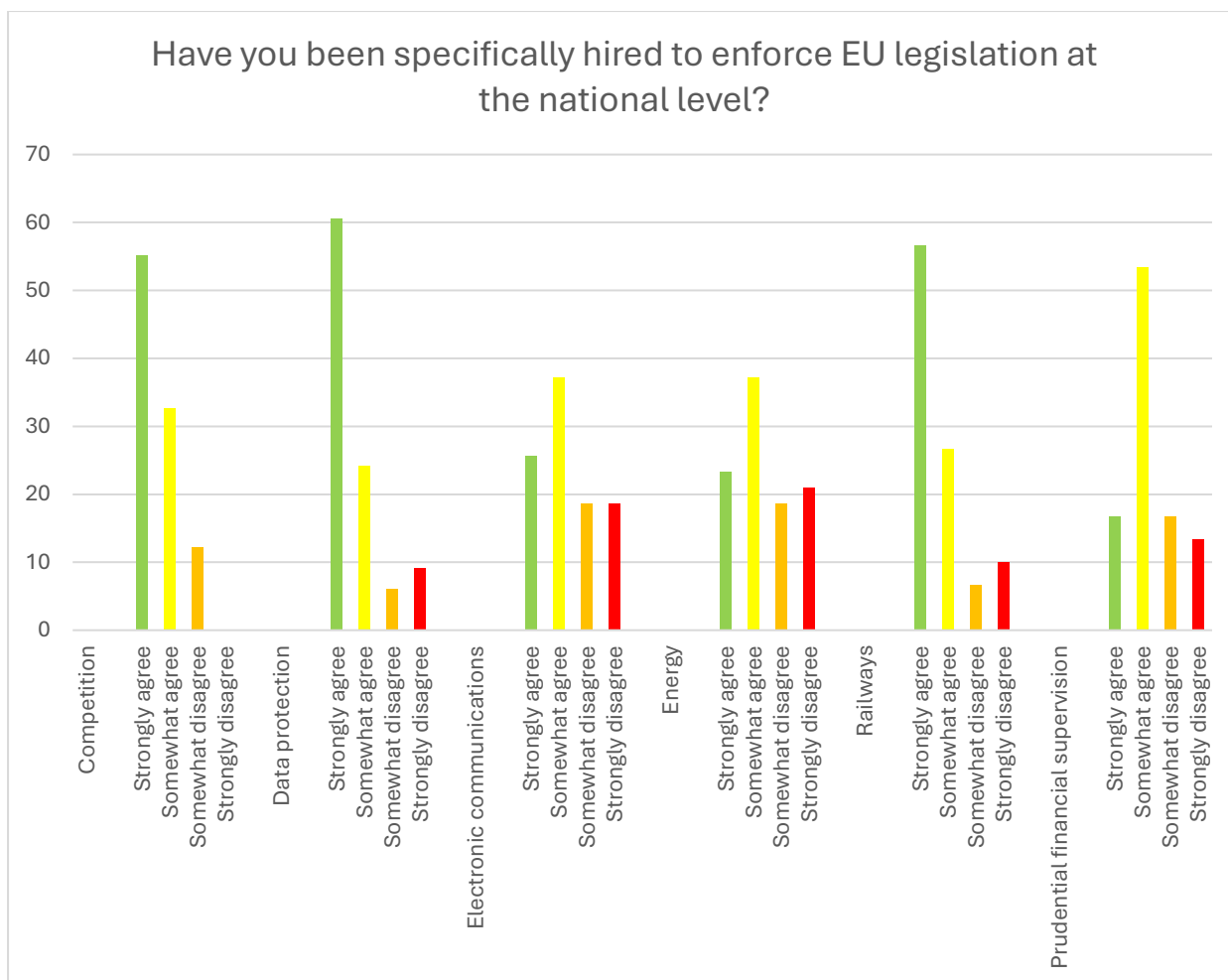
b) Breakdown by Member State (in %)

Austria	
Strongly agree	40
Somewhat agree	40
Somewhat disagree	6,66666667
Strongly disagree	13,33333333
Croatia	
Strongly agree	41,66666667
Somewhat agree	50
Somewhat disagree	6,66666667
Strongly disagree	0
Germany	
Strongly agree	0
Somewhat agree	26,66666667
Somewhat disagree	26,66666667
Strongly disagree	46,66666667
Finland	
Strongly agree	44,44444444
Somewhat agree	38,88888889
Somewhat disagree	11,11111111
Strongly disagree	5,55555556
Latvia	
Strongly agree	25
Somewhat agree	45
Somewhat disagree	10
Strongly disagree	5
Luxembourg	
Strongly agree	78,57142857
Somewhat agree	21,42857143
Somewhat disagree	0
Strongly disagree	0



c) Breakdown by policy area

Competition	
Strongly agree	55,10204082
Somewhat agree	32,65306122
Somewhat disagree	12,24489796
Strongly disagree	0
Data protection	
Strongly agree	60,60606061
Somewhat agree	24,24242424
Somewhat disagree	6,060606061
Strongly disagree	9,090909091
Electronic communications	
Strongly agree	25,58139535
Somewhat agree	37,20930233
Somewhat disagree	18,60465116
Strongly disagree	18,60465116
Energy	
Strongly agree	23,25581395
Somewhat agree	37,20930233
Somewhat disagree	18,60465116
Strongly disagree	20,93023256
Railways	
Strongly agree	56,66666667
Somewhat agree	26,66666667
Somewhat disagree	6,666666667
Strongly disagree	10
Prudential financial supervision	
Strongly agree	16,66666667
Somewhat agree	53,33333333
Somewhat disagree	16,66666667
Strongly disagree	13,33333333



d) Comments

- AT10: “National Enforcement Body (NEB) for Regulations (EC) No 261/2004 and (EC) No 1107/2006.”
- BE1: “The Belgian Competition Authority enforces Articles 101 and 102 TFEU at national level”.
- BE2: “Most individuals working at the CREG have not been specifically hired solely to enforce EU legislation at the national level. However, many of them are involved in tasks and responsibilities that directly stem from European law. While the focus of their work often aligns with EU legal requirements, Belgian law also plays a key role in shaping the regulatory framework, meaning that CREG's activities are influenced by both national and European legal contexts.”
- BE5: “I was not specifically recruited for this purpose, but the enforcement of rules generally concerns EU rules.”
- BG1: “Part of my job is coordination with the European Competition Network”.

- CRO5: "As a legal officer, I am responsible for monitoring EU legislation and providing support for its implementation within my organisation and institution."
- CZ1: "I was not specifically hired to enforce EU legislation per se, however, part of my job description is monitoring of the EU law and its implementation."
- CZ2: "my task are broader"
- CZ3: "We are the national supervisory authority for the protection of personal data – the highest authority in this field."
- CZ7: "Application of national law through an EU-conforming interpretation."
- DE3: "Enforcement of the provisions of the GDPR by controllers in Germany."
- DE6: "My role is to apply and enforce German law. Directly applicable EU law is applied only in exceptional cases."
- DE10: "Data protection legislation existed before the GDPR."
- DE11: "The case officer was not specifically recruited to enforce EU legislation at national level. As part of our regulatory enforcement responsibilities, this task falls within our area of competence."
- DE12: "Regulation (EU) No 1227/2011, together with national provisions under German law, forms the basis of my work."
- DE13: "The Federal Network Agency is fully independent with regard to certain aspects of network charges and network access in the energy sector."
- EST1: "I work with the supervision of energy companies (electricity and natural gas) and with procedures for approving prices."
- EST6: "I was employed to carry out the activities of the sector-specific enforcement authority and the railway safety authority. The latter also includes work related to the EU legal framework for the railway sector."
- EST8: "Main purpose of hiring and task was another project but now i work with the comparison tool."
- EST9: "We are the supervisory authority for the GDPR."
- EST11: "I am an official of the competent data protection authority within the meaning of the GDPR."
- EST12: "My primary job responsibilities do not arise from the enforcement of EU legislation."
- FIN7: "The legislation is harmonised, but we apply national legislation."
- FIN8: "We apply both Articles 101 and 102 TFEU and national competition rules."
- FIN9: "I do not have any duties related to EU legislation."
- FIN12: "My work involves supervising the tariffs and unbundling requirements of electricity and natural gas network operators. The supervision is based on the implementation of EU energy market regulation."
- FIN13: "My current role consists to a very large extent of implementing EU legislation at the national level. The volume and proportion of these tasks have continuously increased."

- FIN18: “All my tasks are based on EU regulations and on the coordination and supervisory responsibilities assigned to my agency on the basis of those regulations.”
- FRA3: “I work within the Europe and International Directorate.”
- GRE2: “Hellenic Competition Commission applies articles 101 and 102 of the Treaty. Eu Legislation supporting the enforcement of these rules is applied by the national competition authority”
- HUN2: “The GVH applies both Hungarian competition law and EU competition rules. In my work, the majority of cases are initiated on the basis of Hungarian legislation; however, EU cases are also relevant from a case-law perspective in these proceedings.”
- HUN6: “Since the objective of the competition authority is also to apply Articles 101 and 102 TFEU, this is one of the reasons why I am employed by the authority.”
- IRE1: “The CCPC is responsible for the enforcement of Irish and EU competition law”
- IRE3: “The CCPC is responsible for the enforcement of Article 101 & 102 TFEU”
- IT3: “The authority was established as an independent body, as expressly required by European Union law.”
- IT4: “The work carried out by data protection authorities involves the application of both Union law and national law.”
- LAT8: “geographical survey of the reach of electronic communications networks capable of delivering broadband”
- LAT16: “One of my responsibilities is to ensure that the actions and decisions of the institution, including regulatory acts, comply not only with national legislation but also with EU law.
- LIT3: “The scope of responsibilities is much broader and is not limited to the implementation of EU legislation.”
- LIT6: “The RRT Council, as the governing body of the national regulatory authority, adopts decisions, including decisions concerning the timely and proper transposition of EU legal acts into national law.”
- LUX2: “Regardless of the service (Antitrust, Online Platforms services), the Authority applies both European and national law.”
- LUX3: “Working at a DPA, we primarily work with EU rules to be enforced at national level”
- LUX7: “National implementation of the supervisory framework for AI systems established under Regulation (EU) 2024/1689.”
- LUX11: “In particular with regard to the implementation of the Artificial Intelligence Regulation.”

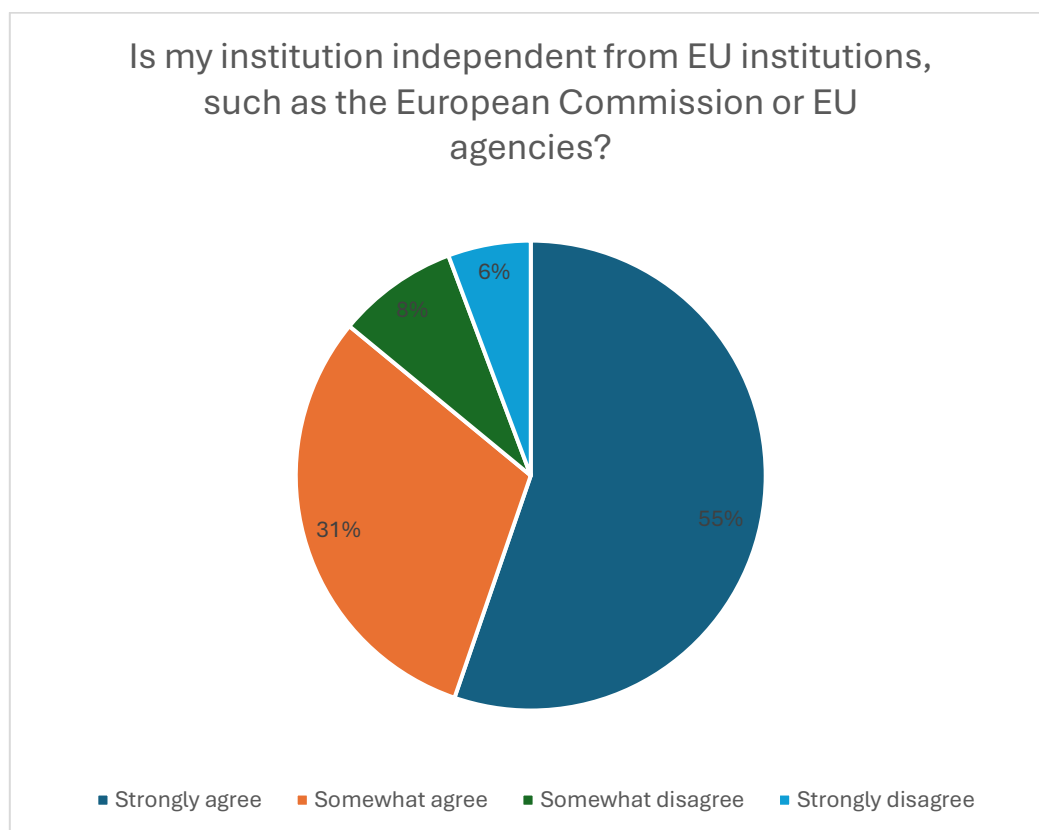
- MAL1: “We are entrusted by national law to enforce as competent authority various EU laws relating to various sectors (electronic communications, postal, eCommerce, digital)”
- NL1: “Role as a supervisory authority: most of the legislation relevant to my daily work originates from the EU.”
- POL7: “Competition protection.”
- RO3: “The legislation is harmonised.”
- RO4: “The National Energy Regulatory Authority (ANRE) is responsible for drafting, adopting, and monitoring the implementation of the binding regulatory framework required for the efficient functioning of the electricity, heat, and natural gas sectors and markets under conditions of efficiency, competition, transparency, and consumer protection. All of these activities must, however, comply with EU legislation.”
- SPA2: “My role is not specifically focused on implementing EU legislation.”
- SPA3: “My organisation carries out its functions in compliance with both national and EU legislation.”
- SWE1: “Applying EU rules is one of the authority’s main tasks.”
- SWE3: “The authority applies EU legislation at national level, but I am not specifically employed for that purpose; I lead the authority.”
- SWE6: “It is part of my mandate to apply EU legislation in national supervision, but the position was not established solely for that purpose.”
- SWE7: “The rules on access to the freight transport market, as well as the rules on tachographs and driving and rest times, leave some room for different interpretations. This has led us to develop national applications of these rules.”

3) Is my institution independent from EU institutions, such as the European Commission or EU agencies?

This question wanted to test the degree of the relationship held between EU and national civil servants, and to gauge the perception of independence vis-à-vis EU bodies.

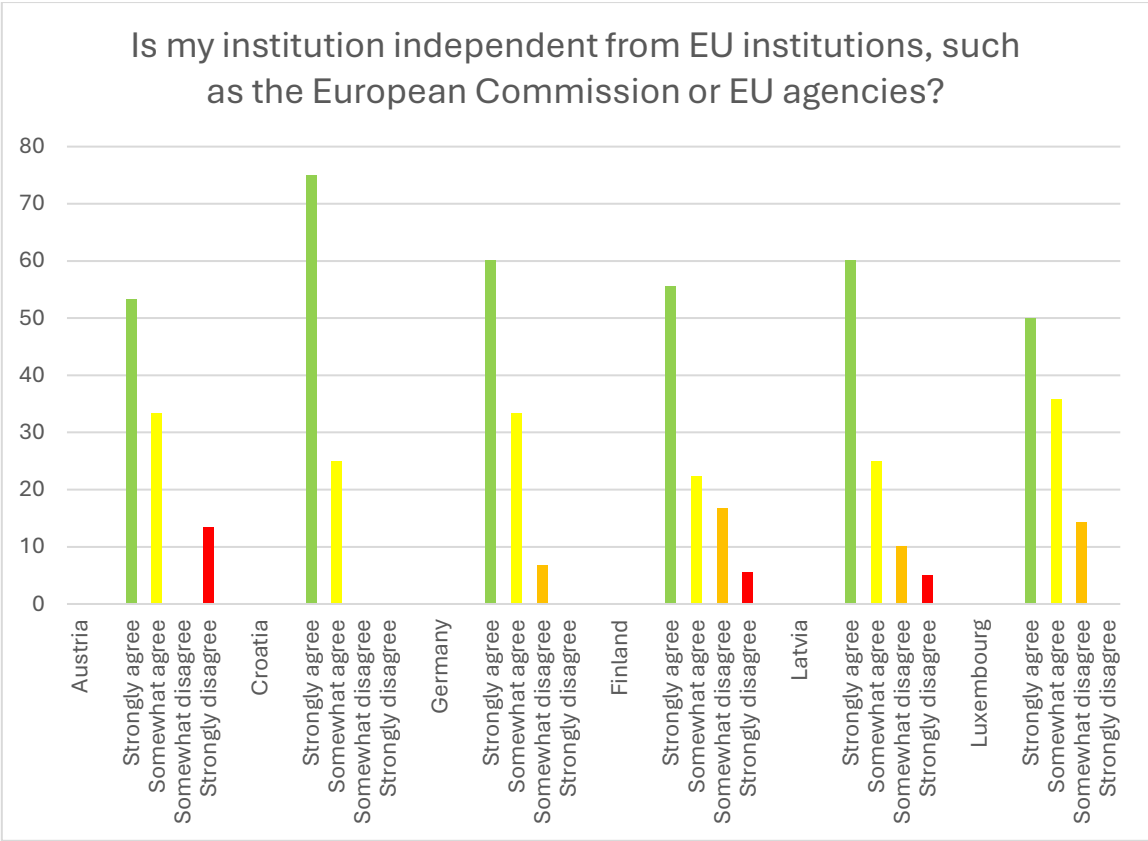
a) Aggregates

Strongly agree	126
Somewhat agree	70
Somewhat disagree	19
Strongly disagree	13
TOTAL	228



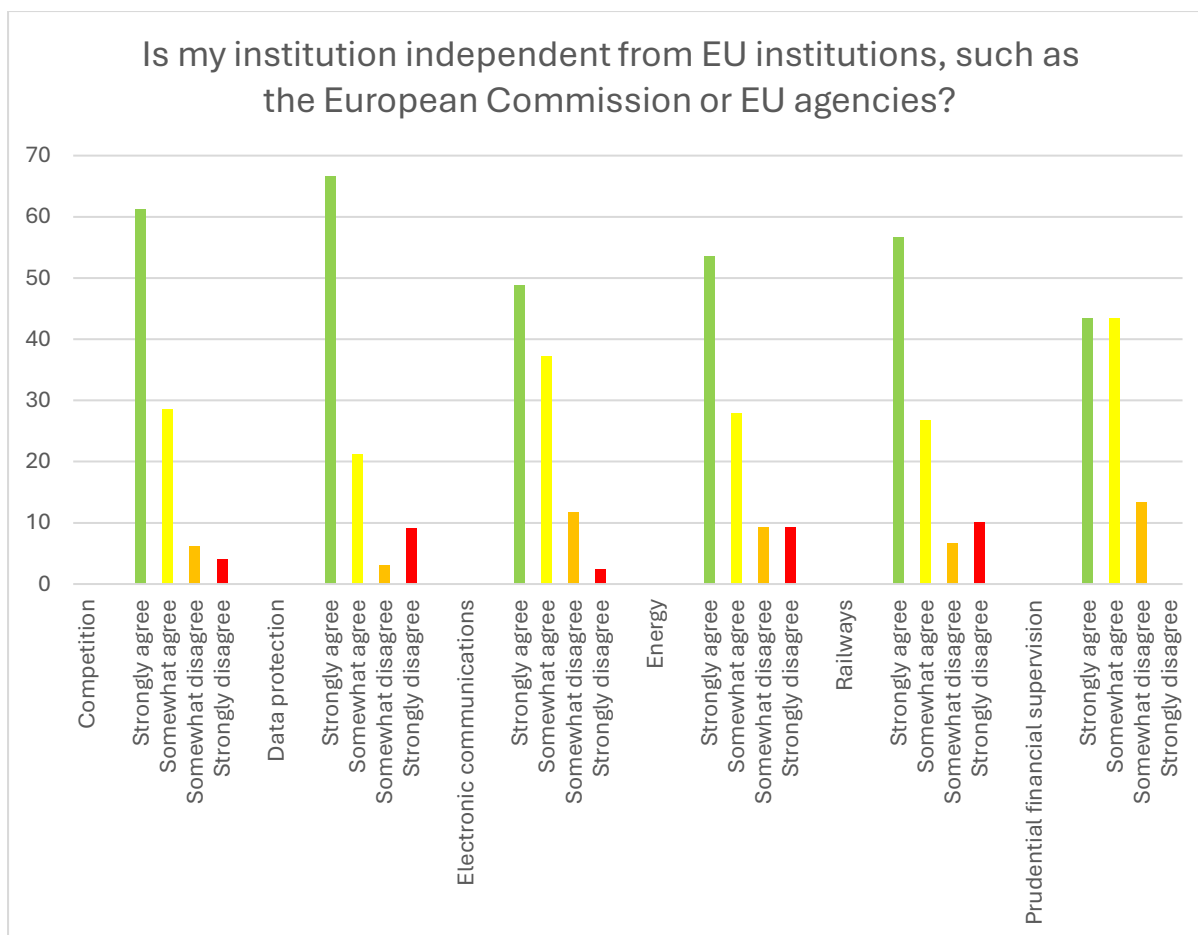
b) Breakdown by Member State (in%)

Austria	
Strongly agree	53,33333333
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	13,33333333
Croatia	
Strongly agree	75
Somewhat agree	25
Somewhat disagree	0
Strongly disagree	0
Germany	
Strongly agree	60
Somewhat agree	33,33333333
Somewhat disagree	6,66666667
Strongly disagree	
Finland	
Strongly agree	55,55555556
Somewhat agree	22,22222222
Somewhat disagree	16,66666667
Strongly disagree	5,55555556
Latvia	
Strongly agree	60
Somewhat agree	25
Somewhat disagree	10
Strongly disagree	5
Luxembourg	
Strongly agree	50
Somewhat agree	35,71428571
Somewhat disagree	14,28571429
Strongly disagree	0



c) Breakdown by policy area (in%)

Competition	
Strongly agree	61,2244898
Somewhat agree	28,57142857
Somewhat disagree	6,12244898
Strongly disagree	4,081632653
Data protection	
Strongly agree	66,66666667
Somewhat agree	21,21212121
Somewhat disagree	3,03030303
Strongly disagree	9,090909091
Electronic communications	
Strongly agree	48,8372093
Somewhat agree	37,20930233
Somewhat disagree	11,62790698
Strongly disagree	2,325581395
Energy	
Strongly agree	53,48837209
Somewhat agree	27,90697674
Somewhat disagree	9,302325581
Strongly disagree	9,302325581
Railways	
Strongly agree	56,66666667
Somewhat agree	26,66666667
Somewhat disagree	6,666666667
Strongly disagree	10
Prudential financial supervision	
Strongly agree	43,33333333
Somewhat agree	43,33333333
Somewhat disagree	13,33333333
Strongly disagree	0



d) Comments

- AT4: “Perhaps only to some extent; the European Commission is also part of BEREC (the group of regulators) and exerts influence there.”
- AT13: “The authority is independent in its decision-making, while being required to implement the provisions established by the EU legislator.”
- BE1: “Independence tempered by need for convergence according to cooperation mechanisms set forth by Regulation 1/2003 and Digital Markets Act”
- BE2: “Yes, the CREG is independent from EU institutions, such as the European Commission or EU agencies. As a national regulatory authority, CREG operates autonomously within Belgium’s legal and regulatory framework. While it is required to ensure compliance with EU law and align its activities with European regulations, it maintains its independence in decision-making, governance, and operational matters. The CREG’s role is to apply both Belgian and European legal frameworks while ensuring that national energy policies meet the broader objectives set by the EU.”

- BE4: “The NBB is an independent institution, but operates within a European framework, both in the context of monetary policy and banking supervision, with the ECB as the central institution.”
- BE5: “We are often part of a system, for example the ECB system together with central banks.”
- CRO5: “Part of the competences is independent, while another part is linked to the supranational level.”
- CZ2: “data protection authorities take part in the mechanism under EDPB”
- CZ7: “We are an independent national regulator.”
- DE6: “The enforcement of national provisions is often constrained by the requirement for prior European Commission approval of State aid schemes. While this requirement is understandable, the European Commission’s (DG COMP) decision-making practice often appears arbitrary and, at times, insufficiently informed by the relevant subject-matter expertise.”
- DE10: “As a national supervisory authority, we are part of the European System of Financial Supervision.”
- DE14: “As a result of a (controversial) judgment by the Court of Justice of the European Union, the Federal Network Agency is independent in the area of network access and network charges. This is problematic because, in particular, network charges are inevitably closely linked to social and industrial policy considerations, which cannot be adequately assessed by a regulator.”
- DK5: “Independent from the political level, but dependent on ACER.”
- EST1: “We operate on the basis of national legislation. In some matters, cooperation with EU institutions is required.”
- EST6: “We are a cooperation partner of the European Union Agency for Railways. The Estonian representative is a member of the Agency’s governing board.”
- EST7: “EU institutions create the legislation that we enforce, and in our work we also take into account the positions and opinions of EU institutions.”
- EST9: “We are an independent national supervisory authority, funded from the state budget of Estonia.”
- EST12: “In certain matters, we must obtain a positive assessment from the European Commission.”
- FIN2: “My institution is an independent supervision authority but we have strongly links with the ESAs, ECB etc.”
- FIN7: “Independent authority.”
- FIN8: “When we apply Articles 101 and 102 TFEU, the decisions are submitted to the European Commission’s Directorate-General for Competition for comments in order to ensure consistent application.”
- FIN9: “EU regulation on anti-money laundering is increasing, and in 2025 AMLA, the EU-wide authority for anti-money laundering supervision and prevention, will commence its operations.”

- FIN13: “Legally, we are independent, but our tasks are closely linked to the work of the Agency for the Cooperation of Energy Regulators (ACER) and the European Commission.”
- FRA1: “As members of the French Energy Regulatory Commission (CRE), we have a duty of independence that also extends to EU institutions and their agencies. At the same time, we engage in institutional cooperation and joint work with ACER (the Agency for the Cooperation of Energy Regulators), and we have very frequent exchanges, estimated in 2019 at nearly 1,500 staff-days, which is a significant level of activity for an agency with 140 full-time equivalent (FTE) staff.”
- FRA3: “ARCEP is an independent administrative authority (AAI). It carries out its duties on behalf of the State, while remaining fully independent from both political authorities and economic actors.”
- GRE3: “Greek CC is independent, but relies upon EU Commission practice and law”
- GRE7: “The authority I work for is independent of the EU institutions, as it enjoys administrative and financial autonomy.”
- HUN2: “The GVH is subordinate to the Hungarian Parliament.”
- HUN4: “According to Section 1, Subsection (2) of Act CXXXIX of 2013 on the National Bank of Hungary (MNB), the MNB, and the members of its bodies, in carrying out their task and duties set out in this Act, shall be independent and shall neither seek nor take instructions from the Government, or the institutions, bodies or offices of the European Central Bank (hereinafter referred to as „ECB”) and - with the exceptions provided for in Subsection (3) - of the European Union, or from the governments of Member States or any other organization or political party. The Government as well as all other bodies shall fully respect this principle and shall not attempt to influence the MNB and its bodies in the performance of their tasks. According to Subsection (3), stemming from its membership in the European System of Financial Supervisors, the MNB shall carry out the tasks delegated from the competencies of the European Banking Authority, the European Insurance and Occupational Pensions Authority, the European Securities and Markets Authority, the Authority for Anti-Money Laundering and Countering the Financing of Terrorism and the European Systemic Risk Board upon the MNB.”
- HUN5: “Consultations are held regularly and cooperation with DG COMP is ongoing, but they cannot (and do not wish to) influence our decisions.”
- IRE3: “While the CCPC works closely with the EU Commission it is an independent public agency”
- IT3: “The authority is independent from any national or European body.”
- IT4: “Data protection authorities are characterised by the requirement of independence. However, under certain conditions, they may be required to implement decisions of the European Data Protection Board.”

- IT7: “The Central Bank is autonomous and independent.”
- LAT16: “The independent status of my institution is established at the level of legal acts.”
- LIT6: “The European Commission has the right to exercise a veto in market analyses.”
- LUX2: “The Authority is a public institution. It is independent and has legal personality. It also enjoys financial and administrative autonomy in Luxembourg.”
- LUX11: “The role of the Commission is becoming increasingly intrusive in the functioning of the Member States.”
- LUX14: “We apply Articles 101 and 102 TFEU independently at national level from the European Commission, while cooperating closely with it. The Commission nevertheless remains the main institution responsible for ensuring the proper application of Articles 101 and 102 TFEU throughout the Union.”
- MAL1: “This is dependent on the legislative framework put in place by the specific EU rules. For example in relation to new digital regulation, such as the Digital Services Act, enforcement is a joint responsibility of national competent authorities and the European Commission. This is necessary in view of the largely trans-national nature of digital markets”
- NL1: “Own competences, but with regular coordination with Brussels (to avoid duplication of work and conflicts with EU law).”
- POL5: “We are fully independent from the European Commission, but we work very closely with the European Supervisory Authorities (ESAs) and the European Systemic Risk Board (ESRB). While we are not institutionally subordinate to these bodies, our obligation to take into account ESRB recommendations and comply with ESA guidelines reflects a degree of substantive dependence.”
- POL7: “A national administrative authority that is not appointed by EU institutions”
- RO4: “ANRE is an autonomous administrative authority with legal personality, financed entirely from its own revenues, and independent in its decision-making, organisational structure, and operations.”
- SWE1: “The budget, instructions, and appointments to senior positions are handled by the Swedish Government.”
- SWE4: “One can never be completely independent. Certain matters, such as the interpretation of the relationship between different EU legal frameworks, must be handled by the European Commission.”
- SWE6: “We are members of the decision-making bodies of several European authorities, which also continuously evaluate our work in various ways.”
- SWE7: “We are dependent on the institutions responsible for legislation, as these regulate the internal market. As an authority, we do not have any direct dependence on EU institutions. However, our authority represents Sweden in

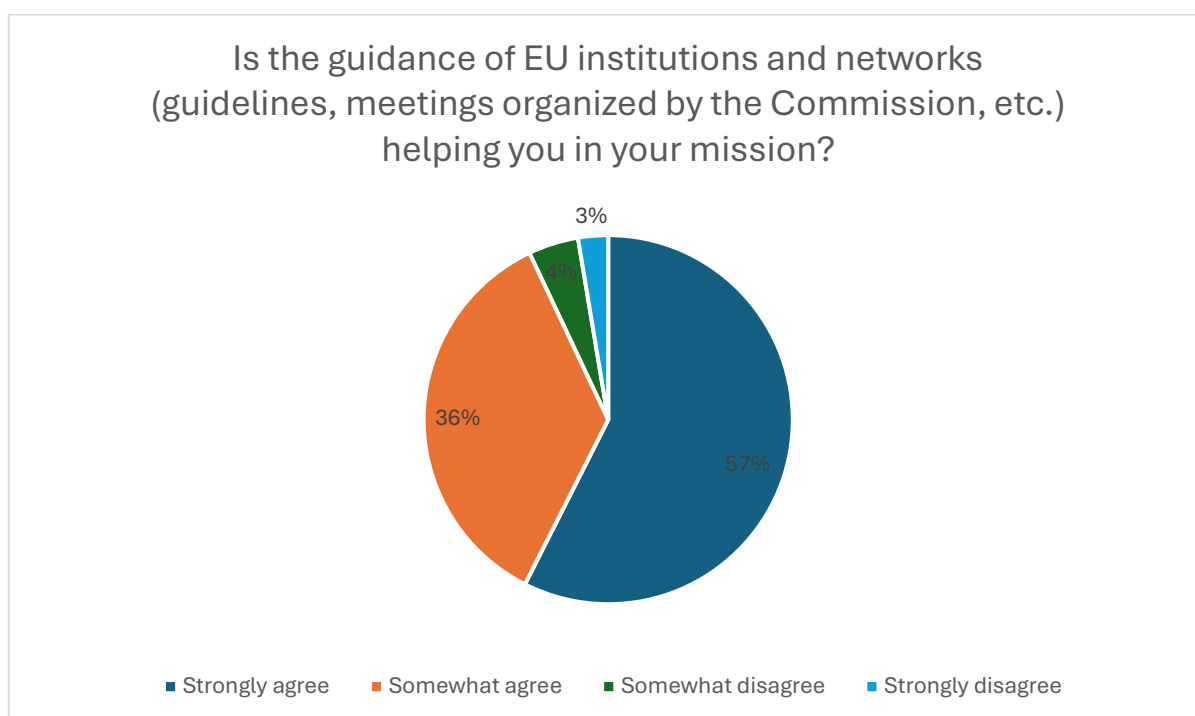
various committees, such as the Road Transport Committee and the DTTF Committee.”

4) Is the guidance of EU institutions and networks (guidelines, meetings organized by the Commission, etc.) helping you in your mission?

This question also wanted to test the degree of the relationship held between EU and national civil servants, with an emphasis on cooperation between EU and national officials.

a) Aggregates

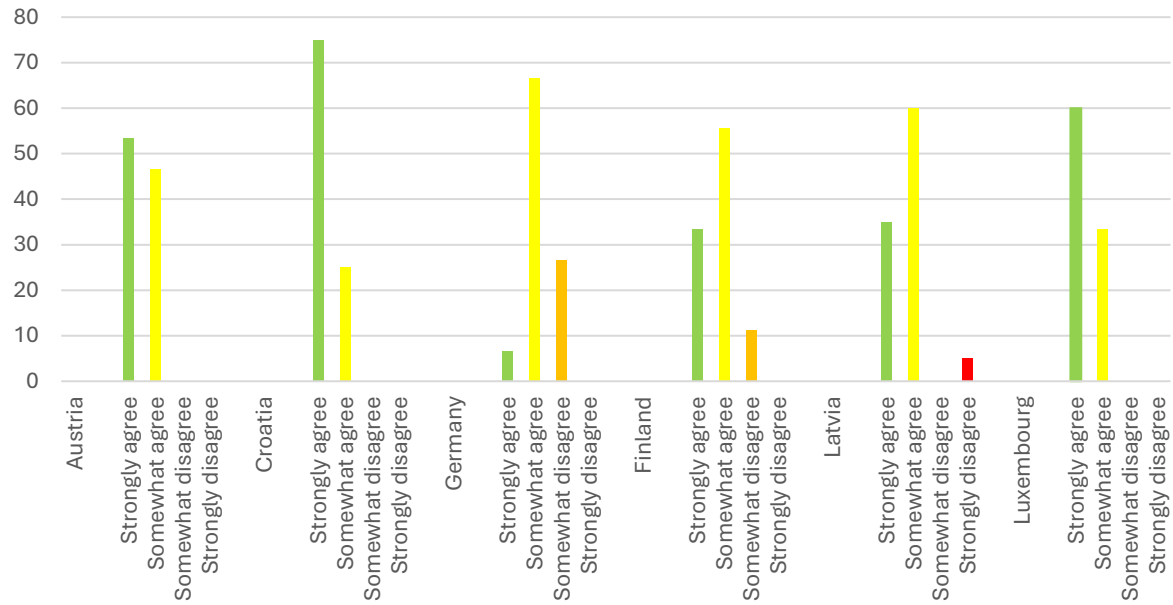
Strongly agree	131
Somewhat agree	81
Somewhat disagree	10
Strongly disagree	6
TOTAL	228



b) Breakdown by Member State (in %)

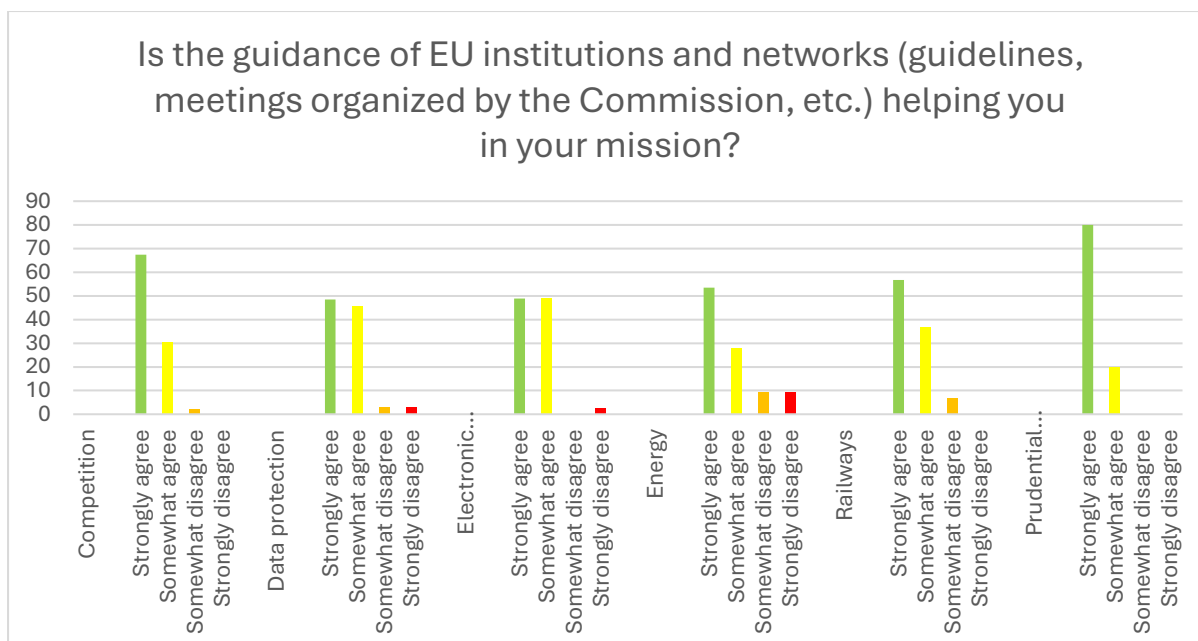
Austria	
Strongly agree	53,33333333
Somewhat agree	46,66666667
Somewhat disagree	0
Strongly disagree	0
Croatia	
Strongly agree	75
Somewhat agree	25
Somewhat disagree	0
Strongly disagree	0
Germany	
Strongly agree	6,66666667
Somewhat agree	66,66666667
Somewhat disagree	26,66666667
Strongly disagree	0
Finland	
Strongly agree	33,33333333
Somewhat agree	55,55555556
Somewhat disagree	11,11111111
Strongly disagree	0
Latvia	
Strongly agree	35
Somewhat agree	60
Somewhat disagree	0
Strongly disagree	5
Luxembourg	
Strongly agree	60
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	0

Is the guidance of EU institutions and networks (guidelines, meetings organized by the Commission, etc.) helping you in your mission?



c) Breakdown by policy area (in%)

Competition	
Strongly agree	67,34693878
Somewhat agree	30,6122449
Somewhat disagree	2,040816327
Strongly disagree	0
Data protection	
Strongly agree	48,48484848
Somewhat agree	45,45454545
Somewhat disagree	3,03030303
Strongly disagree	3,03030303
Electronic communications	
Strongly agree	48,8372093
Somewhat agree	48,8372093
Somewhat disagree	0
Strongly disagree	2,325581395
Energy	
Strongly agree	53,48837209
Somewhat agree	27,90697674
Somewhat disagree	9,302325581
Strongly disagree	9,302325581
Railways	
Strongly agree	56,66666667
Somewhat agree	36,66666667
Somewhat disagree	6,66666667
Strongly disagree	0
Prudential financial supervision	
Strongly agree	80
Somewhat agree	20
Somewhat disagree	0
Strongly disagree	0



d) Comments

- AT3: “Guidelines of the European Data Protection Board.”
- AT12: “Guidelines and regular exchanges with other institutions are very important and helpful, particularly for the interpretation and application of the legislation.”
- AT13: “In most cases, additional Q&As are required, as even Level II remains too broad.”
- BE1: “EU guidelines/communications are helping me and colleagues in the exercise of our mission”
- BE2: “Yes, the guidance provided by EU institutions and networks, including guidelines and meetings organized by the European Commission, is invaluable in supporting the CREG in its mission. These resources help ensure that the CREG’s activities are aligned with EU objectives, regulations, and best practices. Participation in EU-level discussions and access to up-to-date information from EU institutions enable the CREG to stay informed about evolving European policies and frameworks, which is essential for effectively implementing both national and European energy regulations.”
- BE4: “Not all European legislation is always equally precise or clear.”
- BE5: “They are our work.”
- CZ2: “EDPB”
- CZ3: “Data protection has its own platform, namely the EDPB.”
- DE6: “The State aid guidelines (CEEAG) are a useful source of guidance. However, the European Commission (DG COMP) changes its interpretation of

them in an unpredictable manner, which significantly reduces their practical value.”

- DE9: “The level of regulatory density in Europe is very high, as is the level of detail and complexity. The different regulatory frameworks are often not sufficiently coordinated with each other, for example the Electricity Market Directive, the Renewable Energy Directive and the Energy Efficiency Directive. EU legislation sometimes regulates matters in great detail and attempts to accommodate a wide range of interests, which significantly limits its practical legal implementability.”
- DE12: “When interpreting the European Regulation, national specificities of the energy market and German criminal enforcement law also need to be taken into account, as these are often not adequately reflected in the guidelines.”
- EST1: “The guidelines that are followed are derived from national legislation.”
- EST6: “We participate in the European Union Agency for Railways’ plenary meetings, workshops, and railway safety and development days. We use the ERA extranet to obtain relevant guidance.”
- EST7: “It depends on whether the positions are aligned or not.”
- EST9: “We follow and keep ourselves informed of the guidelines and positions of the European Data Protection Board.”
- EST11: “The EDPB guidelines are used.”
- FIN2: “As the EU legislation gives room for interpretation we would like to see that the Commission would be faster giving its interpretations”
- FIN4: “A uniform approach is not suitable for all Member States in every situation. The European Commission places too much emphasis on harmonisation, which often leads to suboptimal outcomes.”
- FIN7: “EU guidelines and case law play a significant role.”
- FIN9: “The EBA has issued guidelines on anti-money laundering, but guidance from other sources is more difficult to find.”
- FIN18: “Guidelines, recommendations, webinars, events and similar activities are often essential for developing consistent interpretations across Member States. We use these guidelines as support for our own practices.”
- FRA1: “The EU plays a key role in organising meetings and forums that bring together participants for both high-level and technical discussions on matters of common European interest. Limiting political considerations helps ensure that these exchanges remain focused on technical issues. However, the EU and its agencies often operate on the basis of established methodological and economic approaches that can be difficult to question or revisit.”
- FRA3: “Certain ARCEP decisions are subject to notification to the European Commission. In this context, the Commission’s guidance and pre-notification meetings provide particularly valuable support.”
- GRE2: “This guidance and cooperation is imperative for our work”

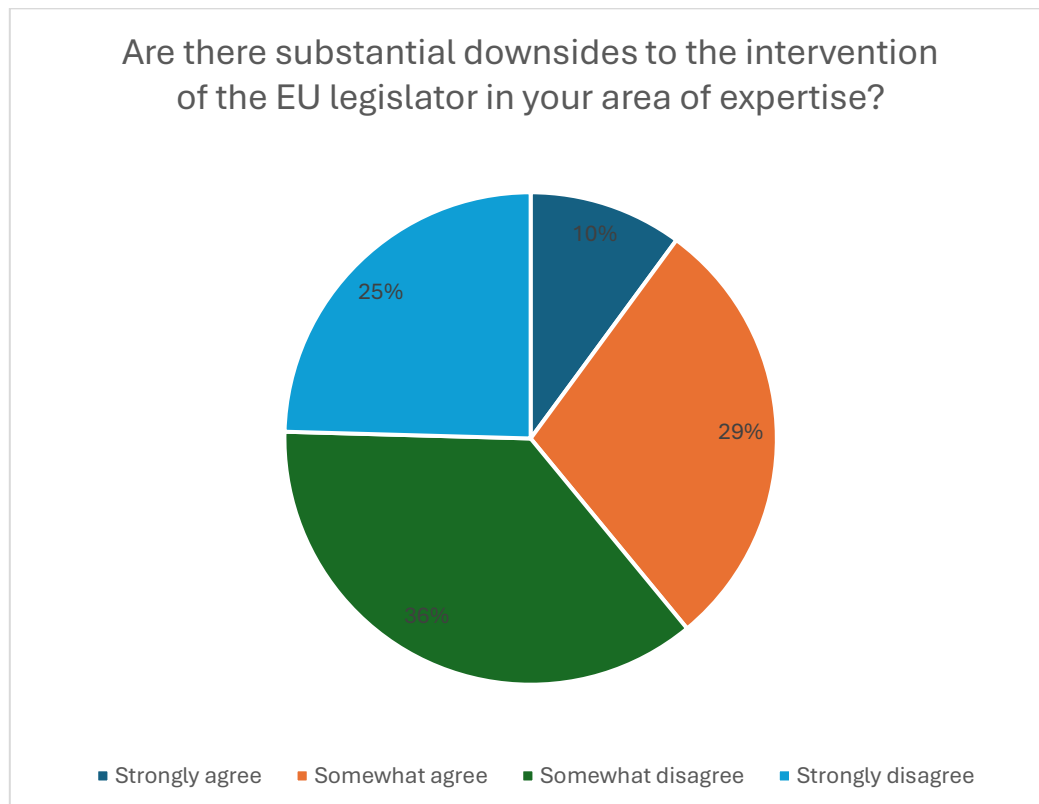
- GRE7: “EU directives, guidelines, and best practices (such as those developed by ACER) guide my recommendations when drafting regulatory acts.”
- HUN2: “We use the communications issued by the European Commission in all relevant proceedings, and we also refer to EU case law. In addition, several meetings are held every year within the framework of the ECN (European Competition Network), and in certain cases we are able to coordinate and consult with the Commission.”
- HUN6: “Within the framework of the ECN (European Competition Network), regular meetings are held. It is possible to address questions to other Member States and the European Commission through RFIs, and the use of Commission guidelines and decisions is also an ongoing part of our daily work.”
- IRE1: “The CCPC follows the EU guidance on merger control and competition enforcement”
- IRE3: “The CCPC is a member of the European Competition Network”
- IT3: “There are still too many differences between Member States for coordination and cooperation activities to be truly effective.”
- LUX2: “When an authority applies European law, it is always beneficial to have European guidance available. It should be noted that, in its capacity as digital services coordinator, the Authority also collaborates with the European Commission in the creation of European guidance.”
- LUX3: “We rely on guidance from the EDPB, EDPS and the CSC”
- LUX14: “They are useful to us and sometimes guide our approach when handling cases, but they are not binding on the Authority. Consequently, companies cannot invoke them before us.”
- POL7: “They help to develop and implement EU legislation in national law.”
- SWE4: “The DORA regulations are new, and it is essential to have the possibility to ask questions and receive answers from the ESAs and, in some cases, from the European Commission.”
- SWE7: “We are members of, among others, the networks CORTE and ELA (European Labour Authority), where we are often involved in developing guidance. The most recent example is the work on Trace II, where we contributed to the development of guidance on the supervision of regulatory changes introduced by the Mobility Package (a set of rules in the field of professional road transport adopted in 2021).”

5) Are there substantial downsides to the intervention of the EU legislator in your area of expertise?

This question wanted to test the possible intrusion of the EU legislator in the practice of national administrative authorities, and to test the potential differences across policy areas.

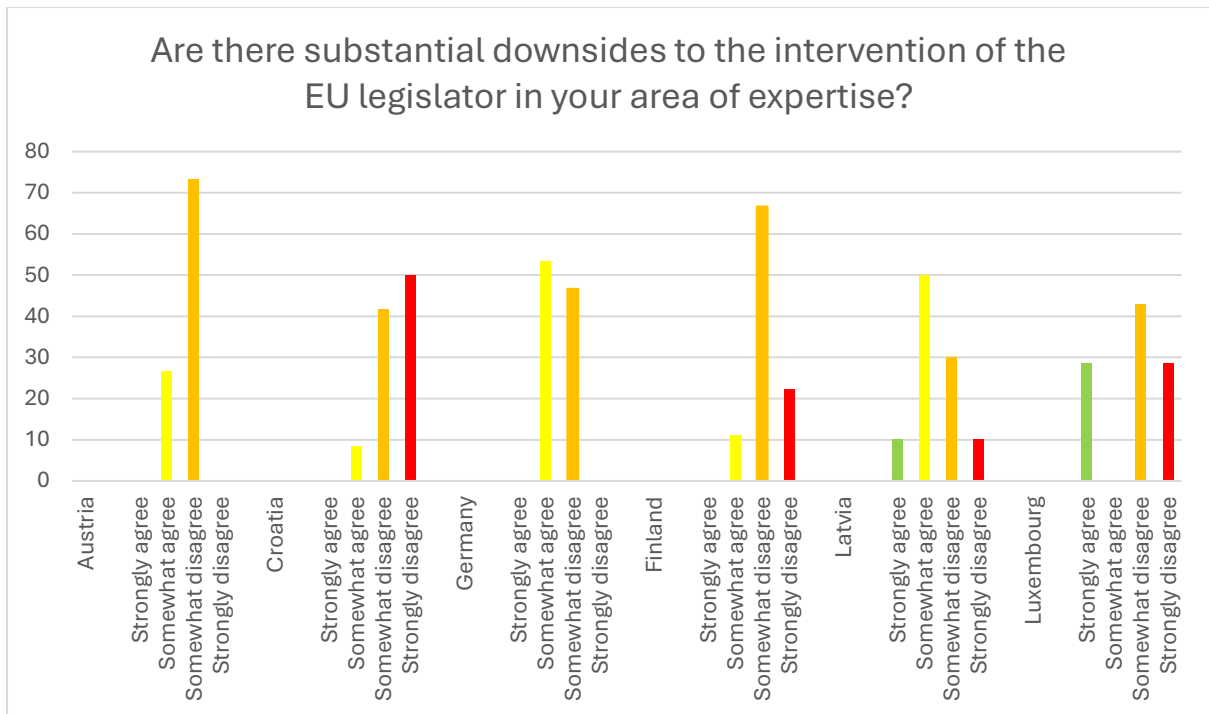
a) Aggregates

Strongly agree	23
Somewhat agree	66
Somewhat disagree	83
Strongly disagree	56
TOTAL	228



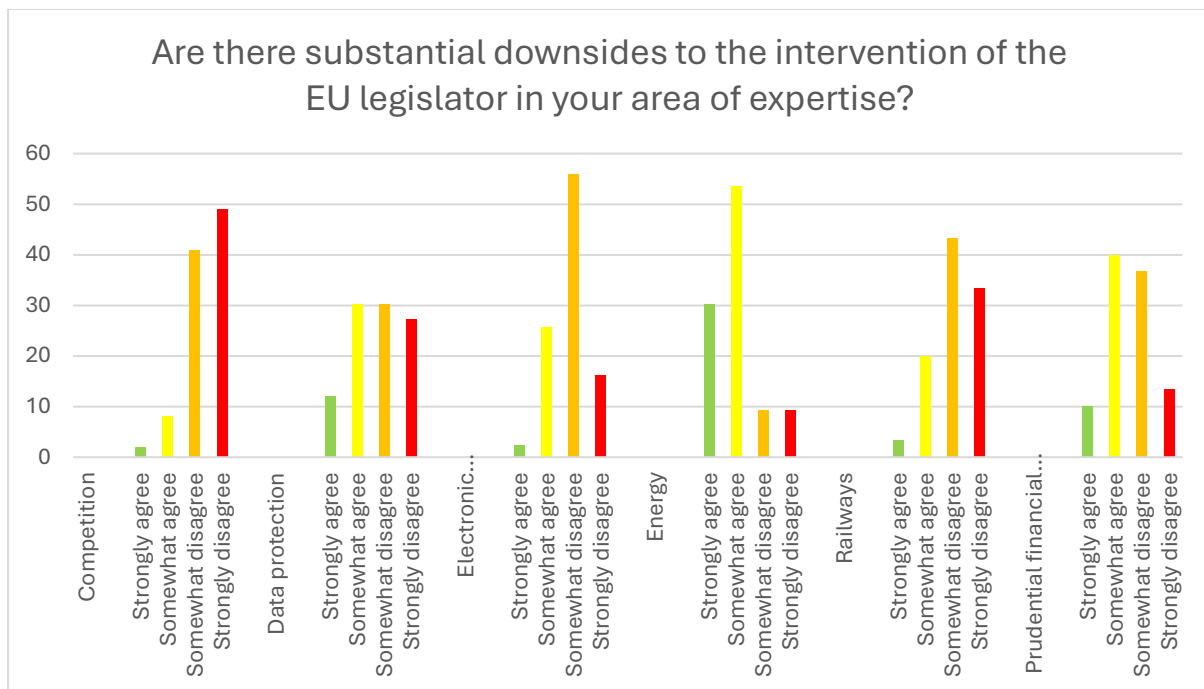
b) Breakdown by Member State (in %)

Austria	
Strongly agree	0
Somewhat agree	26,66666667
Somewhat disagree	73,33333333
Strongly disagree	0
Croatia	
Strongly agree	0
Somewhat agree	8,333333333
Somewhat disagree	41,66666667
Strongly disagree	50
Germany	
Strongly agree	0
Somewhat agree	53,33333333
Somewhat disagree	46,66666667
Strongly disagree	0
Finland	
Strongly agree	0
Somewhat agree	11,11111111
Somewhat disagree	66,66666667
Strongly disagree	22,22222222
Latvia	
Strongly agree	10
Somewhat agree	50
Somewhat disagree	30
Strongly disagree	10
Luxembourg	
Strongly agree	28,57142857
Somewhat agree	0
Somewhat disagree	42,85714286
Strongly disagree	28,57142857



c) Breakdown by policy area (in %)

Competition	
Strongly agree	2,040816327
Somewhat agree	8,163265306
Somewhat disagree	40,81632653
Strongly disagree	48,97959184
Data protection	
Strongly agree	12,12121212
Somewhat agree	30,3030303
Somewhat disagree	30,3030303
Strongly disagree	27,27272727
Electronic communications	
Strongly agree	2,325581395
Somewhat agree	25,58139535
Somewhat disagree	55,81395349
Strongly disagree	16,27906977
Energy	
Strongly agree	30,23255814
Somewhat agree	53,48837209
Somewhat disagree	9,302325581
Strongly disagree	9,302325581
Railways	
Strongly agree	3,333333333
Somewhat agree	20
Somewhat disagree	43,33333333
Strongly disagree	33,33333333
Prudential financial supervision	
Strongly agree	10
Somewhat agree	40
Somewhat disagree	36,66666667
Strongly disagree	13,33333333



d) Comments

- AT3: “Partial conflicts with Austrian constitutional law.”
- AT4: “The European Commission’s veto power in the context of market analyses (we had already wanted to define markets on a regional basis earlier, but this required an additional round).”
- AT5: “Overregulation, complex structures and instruments (e.g. peer reviews and convergence studies) consume resources (both of authorities and financial institutions) and have a negative impact on the acceptance of the EU regulatory framework.”
- AT13: “Especially when interpretations are not clearly defined or simplification is not taken into account.”
- BE1: “EU competition rules are a corollary of the EU Single Market”
- BE2: “While the intervention of the EU legislator has brought significant benefits, such as greater market integration, consumer protection, and sustainability goals, there are some challenges associated with it. One downside is the complexity of ensuring that national regulations are fully aligned with ever-evolving EU laws, which can require substantial resources and adaptations. Additionally, the increasing scope of EU legislation may limit national flexibility, making it more difficult for the CREG to tailor solutions to specific local contexts. Despite these challenges, the overall benefits of EU intervention, particularly in promoting consistency and achieving broader energy goals, outweigh the downsides.”

- CRO5: “As with all legislative interventions, it is sometimes difficult to take into account the different national specificities of individual countries. However, overall, I believe that EU legislation in our area is appropriate and effective.”
- CZ2: “ambiguity of concepts; political ambitions contrary to basic law principles”
- CZ3: “The question does not make sense in view of the remit of the Data Protection Authority.”
- DE6: “When the EU legislator engages in excessive micromanagement or follows short-lived policy trends (such as rules on aggregators, energy sharing, energy communities, endogenous volume control in auction procedures, bidding zone splitting, or offshore bidding zones), the result is an overly complex regulatory framework that requires substantial effort while delivering little or no practical benefit.”
- DE12: “Yes, partly, as the interpretation does not always fit the national situation.”
- DE14: “The EU legislator is not immune to the influence of energy sector populism. For example, for populist reasons, “energy sharing” was made a binding European requirement, even though it does not provide any real benefit. Similar concerns apply to concepts such as energy communities or the discussion on bidding zone splitting. There are many other examples of this kind. Such developments are frustrating and consume significant time and resources.”
- EST1: “EU bureaucracy is increasingly influencing national legislation, leading to a growing level of unnecessary intervention.”
- EST2: “Every country is different, and Estonia is a very small country where some practices are difficult to adapt.”
- EST3: “There are too many complex rules and frameworks. The freedom of companies to operate has been significantly restricted.”
- EST4: “The extent of obligations should depend on the size of the market and the company.”
- EST6: “The technical specifications for interoperability in the railway sector contain too many cross-references, which makes them difficult to read and may ultimately affect the understanding of the text.”
- EST7: “Occasional overregulation and excessive bureaucracy. In some cases, a more balanced consideration of different fundamental rights would be necessary, as the current approach is sometimes overly biased.”
- EST9: “is not aware of”
- EST11: “Occasional overregulation.”
- EST12: “We are required to implement measures for which there is no real need in the market.”

- FIN9: “It is preferable to have harmonised regulation, although at times it can be difficult to understand the priorities behind it.”
- FIN13: “The objective of creating common energy markets based on common rules is appropriate, but some legislation has been developed without sufficiently taking into account national circumstances or has been designed primarily from a Central European perspective.”
- FRA3: “Where appropriate, the European legislator should take into account the national circumstances of the Member States. This assessment must be carried out on a case-by-case basis.”
- GRE1: “The different sizes of EU national economies require adjustment of EU competition law at the local level, but local competition authorities are reluctant to take such initiatives”
- GRE7: “I believe so. One example is the implementation of the electricity market. Although this is not within my area of responsibility, I believe that the electricity market in my country requires different rules and implementation mechanisms because: (a) my country has limited interconnections with Central and Western Europe, and (b) there is a need to prevent the emergence of a potential cartel among the small number of thermal electricity producers.”
- HUN2: “EU legislation in the narrowly defined field of competition law is limited. In the broader area (e.g. DMA, DSA), however, it is favourable and generally supports our work.”
- HUN6: “EU institutions, guidelines, and decisions support my work and do not make it more difficult or hinder it in any way.”
- IRE2: “There is an ongoing tension between the need for consistent pan EU regulation and the need to take account of local conditions. Sometimes the balance has swung too far towards centralisation.”
- IT1: “The country of origin principle has become a free for all weapon for digital platforms not based in Italy”
- IT3: “However, I am concerned that there may be a future reduction in the role and responsibilities of regulatory authorities, starting with the European Regulation on railway capacity allocation that is to be adopted.”
- LAT7: “quantity of unnecessary regulation from theoretical point of view, without evaluation of the possibility of practical implementation. sometimes it is not possible to implement all the regulation in practice.”
- LAT10: “The same requirements are imposed on all Member States without taking proportionality into account.”
- LIT3: “The Postal Directive has not been amended for ten years and is outdated. EU Member States are urging the European Commission to undertake a fundamental review of the Postal Directive.”
- LIT6: “The very large number of EU legal acts and Regulations represents a significant burden for markets.”

- LUX11: “The complexity resulting from the interplay between different legislative texts appears to reflect a gap between EU legislation and practical operational realities.”
- LUX14: “No disadvantages. Most of the legislative acts adopted recently (such as the Damages Directive or the ECN+ Directive) were discussed with the NCAs beforehand.”
- MAL1: “In the process of adoption of EU law, the case is often made against a one-size-fits-all approach, particularly when you have substantial differences in markets that may require tailor made actions. Notwithstanding, we understand the need to as much as possible ensure harmonised implementation to avoid potential market distortions especially in case of pan-European markets.”
- MAL2: “Cross-border provision of services in certain financial service sectors is sometimes unduly restricted - eg absence of a depositary passport under the AIFMD. Proportionality thresholds are sometimes not calibrated well enough to cater for small firms in small markets - eg reporting obligations”
- NL1: “An issue requiring attention and careful consideration is how to integrate EU law into the national system of procedural law.”
- POL2: “We often face an excessive number of changes at the EU level, as well as regulations that lack sufficient clarity, particularly with regard to technical aspects. When different EU Member States interpret the same provisions in different ways, there is often no follow-up at the EU level to clarify or improve those regulations.”
- POL3: “It is not uncommon for EU legislation to address issues that arise only in certain Member States and are of marginal significance in others, while nevertheless imposing the same requirements on market participants and the competent authorities across all Member States. A good example is the NPL Directive.”
- POL7: “It is not always possible to apply it in practice, and it often requires clarification and further specification.”
- SPA1: “At times, European legislation does not fully align with or fit the national market and its operational realities. There may also be needs that have not been addressed in the legislation, despite having been advocated for during the legislative process.”
- SPA2: “EU audiovisual legislation provides a common framework.”
- SWE1: “It is sometimes difficult to gain support for rules that reflect the characteristics of the national market. In addition, it can be challenging to involve stakeholders in the legislative process.”
- SWE6: “Conflicts between national law and EU law may arise both during the transposition and during the application of EU law at national level. This is not unique to our authority.”

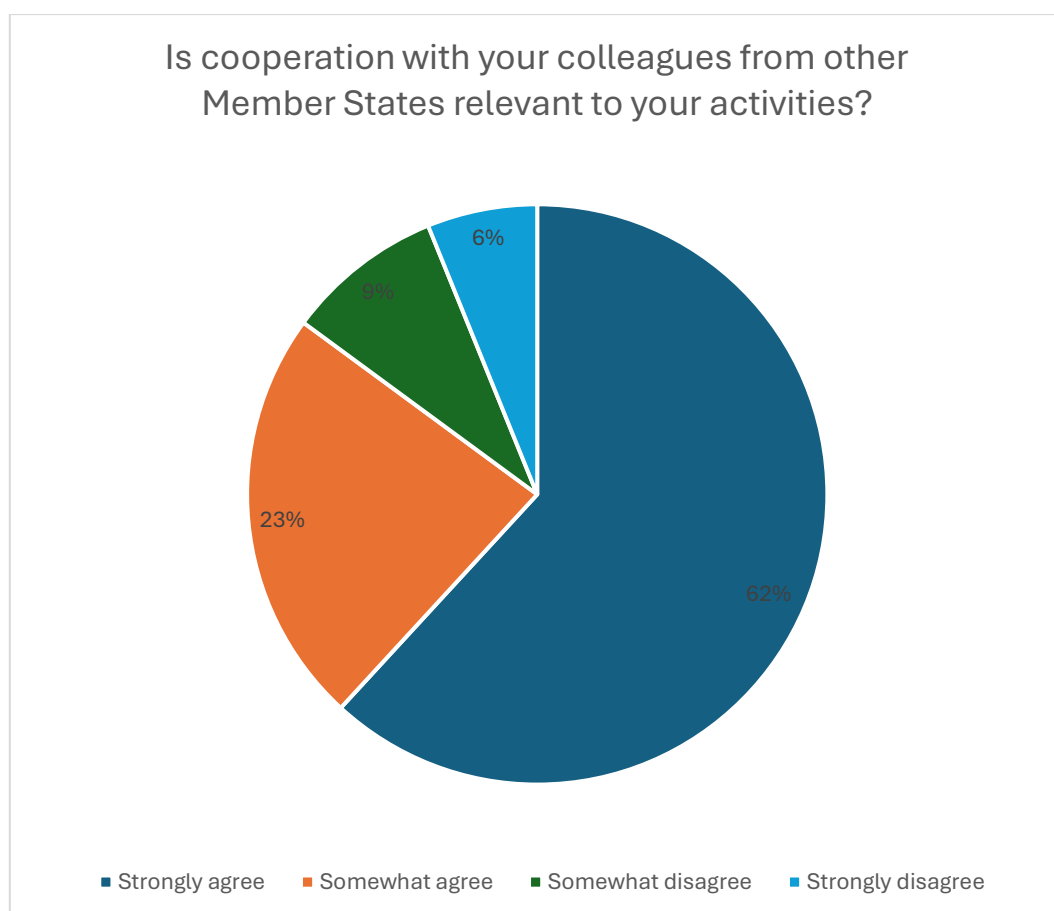
- SWE7: “There is overregulation, for example in the area of driving and rest times, where the level of detail is challenging and leads to problems in national application.”

6) Is cooperation with your colleagues from other Member States relevant to your activities?

This question wants to test whether EU law established horizontal collaborations among civil servants across Member States.

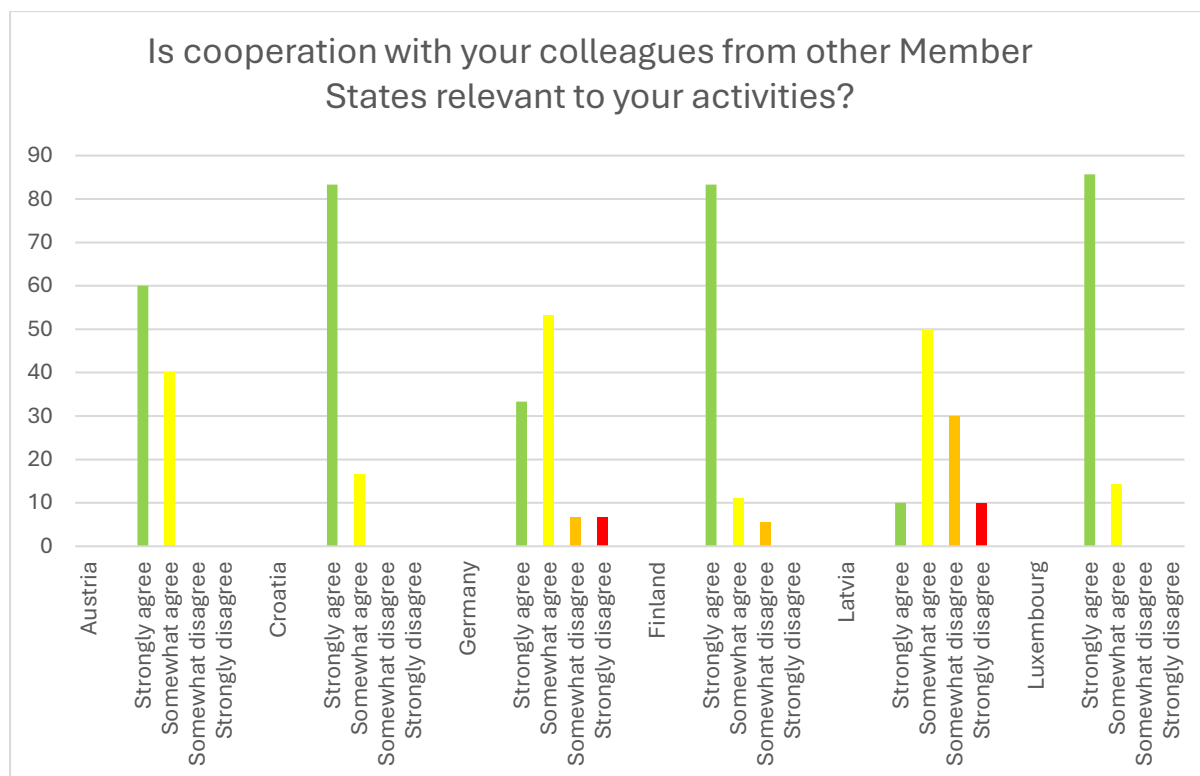
a) Aggregates

Strongly agree	141
Somewhat agree	53
Somewhat disagree	20
Strongly disagree	14
TOTAL	228



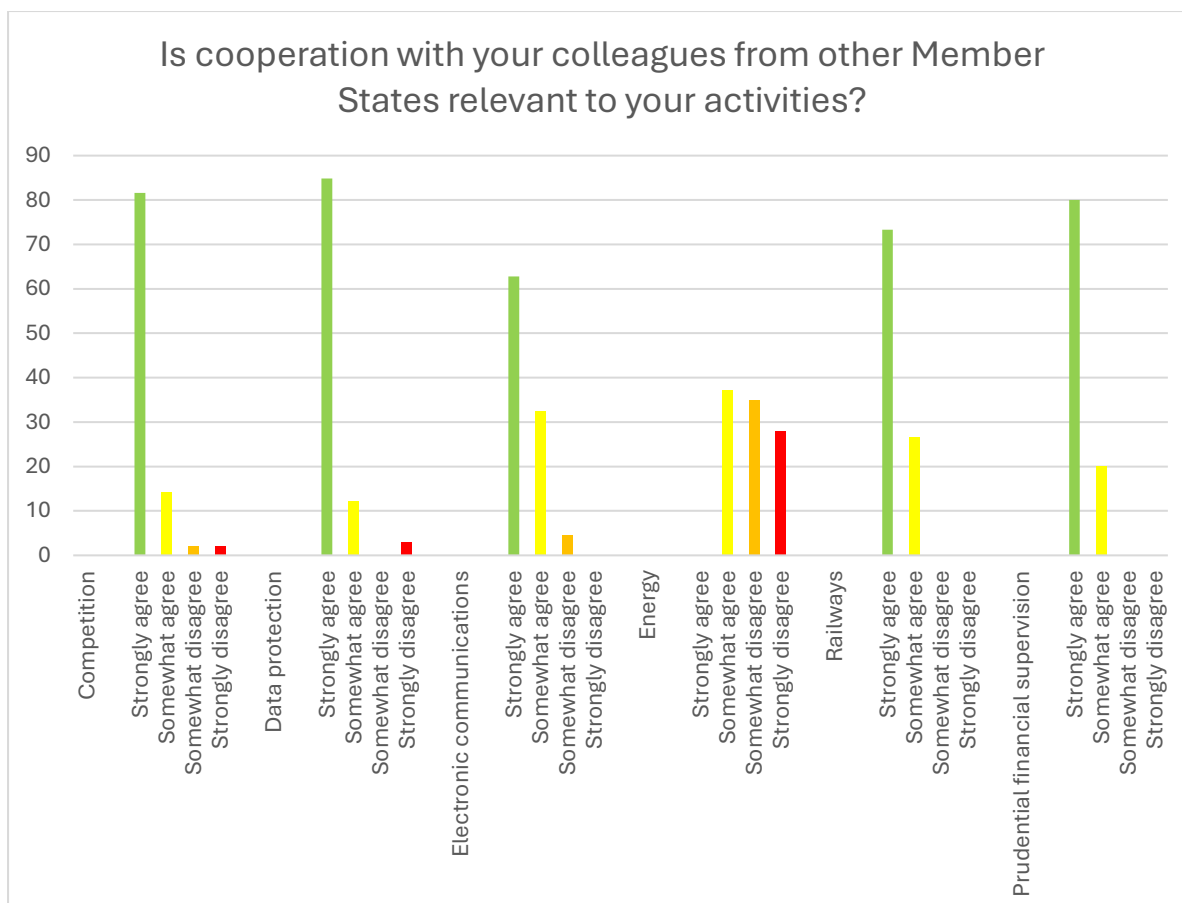
b) Breakdown by Member State (in %)

Austria	
Strongly agree	60
Somewhat agree	40
Somewhat disagree	0
Strongly disagree	0
Croatia	
Strongly agree	83,33333333
Somewhat agree	16,66666667
Somewhat disagree	0
Strongly disagree	0
Germany	
Strongly agree	33,33333333
Somewhat agree	53,33333333
Somewhat disagree	6,66666667
Strongly disagree	6,66666667
Finland	
Strongly agree	83,33333333
Somewhat agree	11,11111111
Somewhat disagree	5,55555556
Strongly disagree	0
Latvia	
Strongly agree	10
Somewhat agree	50
Somewhat disagree	30
Strongly disagree	10
Luxembourg	
Strongly agree	85,71428571
Somewhat agree	14,28571429
Somewhat disagree	0
Strongly disagree	0



c) Breakdown by policy area (in %)

Competition	
Strongly agree	81,63265306
Somewhat agree	14,28571429
Somewhat disagree	2,040816327
Strongly disagree	2,040816327
Data protection	
Strongly agree	84,84848485
Somewhat agree	12,12121212
Somewhat disagree	0
Strongly disagree	3,03030303
Electronic communications	
Strongly agree	62,79069767
Somewhat agree	32,55813953
Somewhat disagree	4,651162791
Strongly disagree	0
Energy	
Strongly agree	0
Somewhat agree	37,20930233
Somewhat disagree	34,88372093
Strongly disagree	27,90697674
Railways	
Strongly agree	73,33333333
Somewhat agree	26,66666667
Somewhat disagree	0
Strongly disagree	0
Prudential financial supervision	
Strongly agree	80
Somewhat agree	20
Somewhat disagree	0
Strongly disagree	0



d) Comments

- BE1: “Very frequent and relevant.”
- BE2: “Yes, cooperation with colleagues from other Member States is relevant to the CREG's activities, as it allows for the exchange of best practices, harmonization of approaches, and alignment with EU-wide objectives. However, while such cooperation is valuable, it is not always necessary for every aspect of our work. In some cases, national specificities or particular regulatory needs may not require direct collaboration with other Member States. Nonetheless, on issues such as cross-border infrastructure, for example, cooperation is essential to ensure consistency and effectiveness at the European level.”
- BE4: “The NBB cooperates closely with other central banks within the euro area, the EU, and at international level, both in relation to its central banking tasks and its role as a supervisory authority.”
- BG1: “within the European Competition Network”
- DE6: “Cooperation within CEER is productive because it provides insight into the similar challenges faced by neighbouring countries. It also offers opportunities to learn effective solutions from them.”

- DE11: “Financial market participants increasingly operate across national borders. Cooperation with partner authorities from other Member States is therefore indispensable.”
- DE14: “Within CEER, cooperation takes place across national borders. However, in recent years this cooperation has become dominated by ACER, which has made exchanges between colleagues more difficult.”
- EST1: “I fully agree regarding cross-border issues, but not at all with regard to national regulations.”
- EST2: “It is very useful to learn about the practices of other countries and their progress.”
- EST6: “Exchange of best practices and increased impact of innovation.”
- EST7: “Both the sharing of experiences and the direct application of the one-stop-shop and consistency mechanisms under the GDPR.”
- EST9: “In the field of data protection, cross-border supervisory procedures are part of our daily work.”
- EST11: “Essential in cross-border procedures.”
- FIN7: “The cooperation network of national competition authorities is important.”
- FIN9: “The best part of this work.”
- FIN18: “Cooperation with colleagues from other Member States is very important and essential.”
- FRA1: “It is an integral part of ACER, the agency established to facilitate coordination among EU regulators.”
- FRA3: “The law provides that ARCEP assists the French authorities on international matters. Within the scope of its own competences, it also engages directly with the European Commission and with its counterpart authorities, in particular through established groups of regulators.”
- GRE2: “European Competition Network https://competition-policy.ec.europa.eu/antitrust-and-cartels/european-competition-network_en”
- GRE7: “It would be very valuable if there were a system of staff exchanges or rotational assignments in regulatory authorities of other countries. Working groups and workshops alone are not sufficient.”
- HUN2: “The competition law framework is almost identical in all EU countries, making the exchange of experience important. Dedicated events for this purpose are also organised within the framework of the ECN.”
- HUN6: “Useful exchanges of information take place within the ECN.”
- IRE3: “The CCPC cooperates with the EU Commission and with other National Competition Agencies across the EU in the enforcement of EU competition law EU”
- IT3: “We are more often the ones sharing good practices than acquiring them.”
- IT7: “We are part of the Eurosystem.”

- LUX2: “In implementing the DSA, the Authority cooperates with the digital services coordinators of the Member States of the Union.”
- LUX14: “Yes, absolutely. We are part of a network (ECN – see Regulation No 1/2003 and the ECN+ Directive) together with the European Commission and the other NCAs.”
- MAL1: “This is critical to our work, and in many cases the EU framework provides for such cooperation through institutional EU bodies (e.g. BEREC in the case of electronic communications, ERGP in the case of postal, the Board of Digital Service Coordinators in the case of the DSA)”
- POL7: “Exchange of experience.”
- RO4: “This cooperation provides an opportunity to learn about the best practices and regulatory approaches developed in other Member States.”
- SPA1: “It is useful for understanding the particular characteristics of other jurisdictions, while also helping them understand the specific features of our own jurisdiction.”
- SPA2: “This is particularly important for the application of the Country of Origin Principle.”
- SWE1: “Especially representatives from the other Nordic countries.”
- SWE4: “For certain issues, it is valuable to see how other Member States have addressed matters in practice and, in some cases, to gain inspiration on how to interpret an article.”

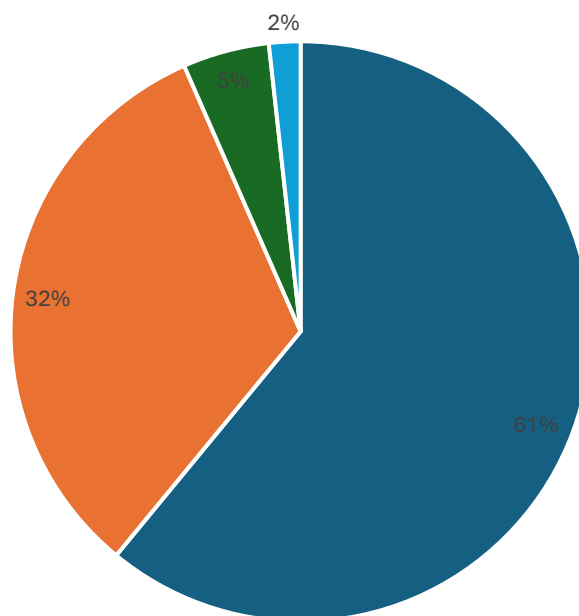
7) Does the participation of your institution in EU-established networks or platforms facilitate your role of enforcement?

The purpose of the question was to test the believed added value of cooperating within European administrative networks to enhance cooperation at national level.

a) Aggregates

Strongly agree	139
Somewhat agree	74
Somewhat disagree	11
Strongly disagree	4
TOTAL	228

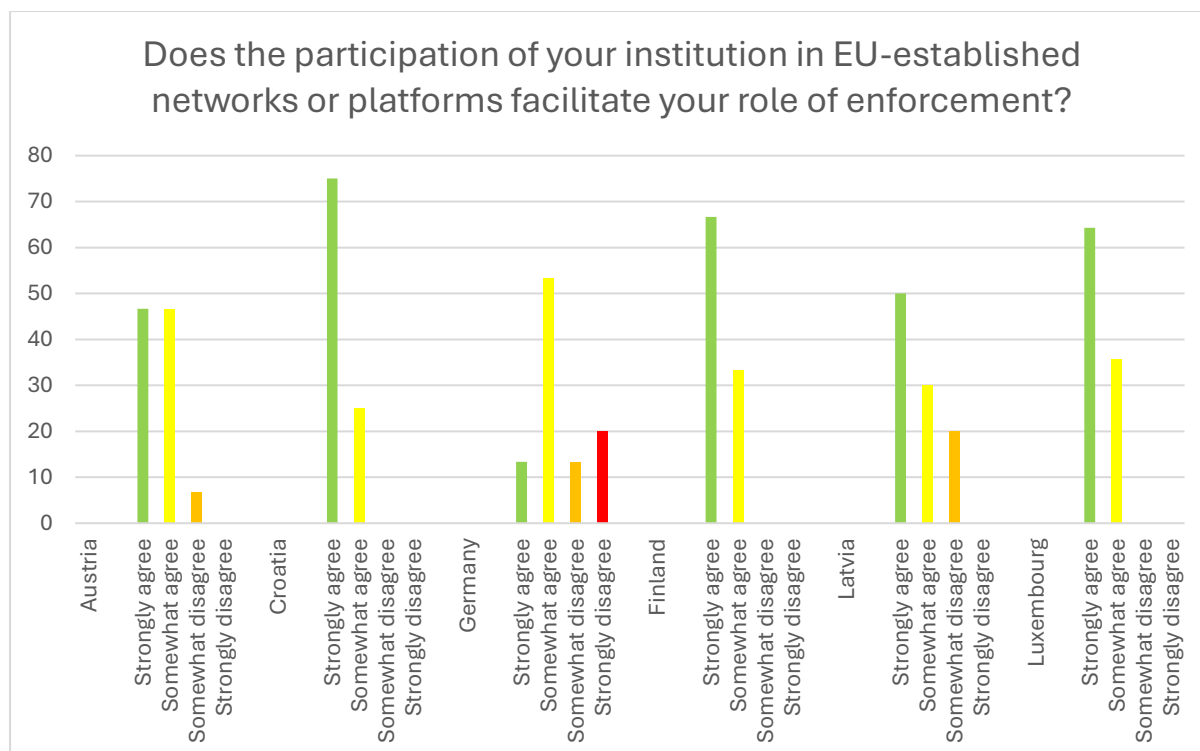
Does the participation of your institution in EU-established networks or platforms facilitate your role of enforcement?



■ Strongly agree ■ Somewhat agree ■ Somewhat disagree ■ Strongly disagree

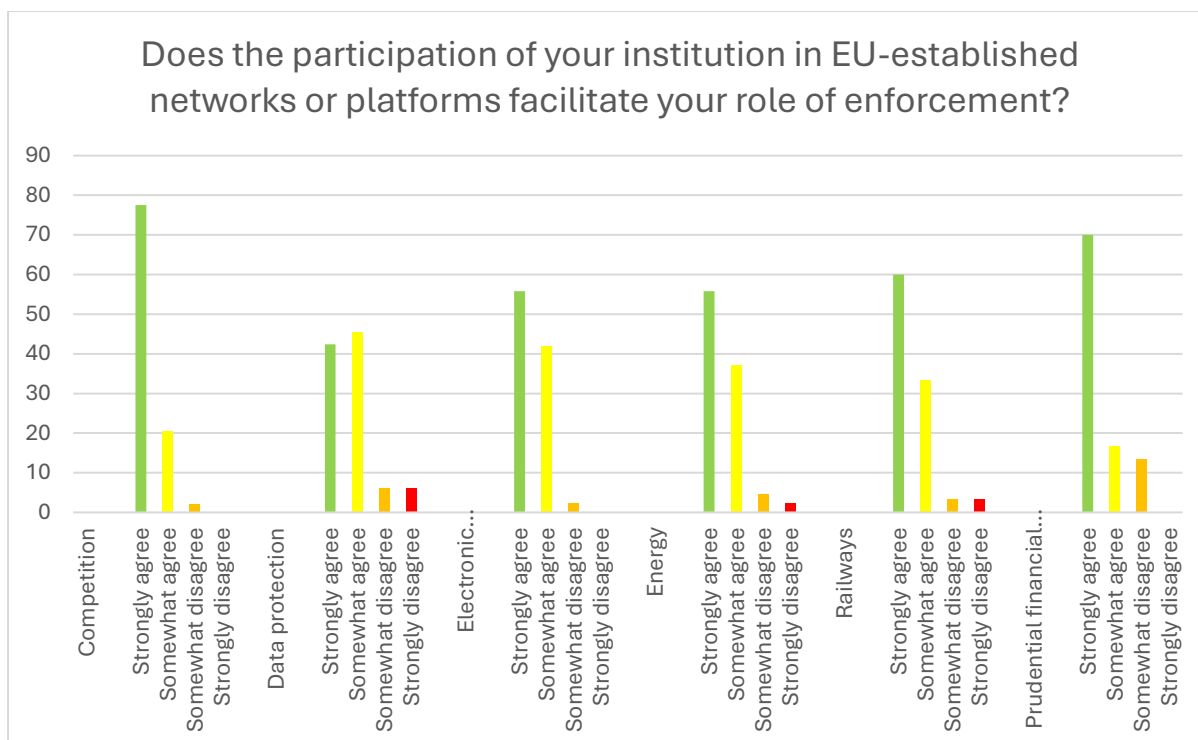
b) Breakdown by Member State (in %)

Austria	
Strongly agree	46,66666667
Somewhat agree	46,66666667
Somewhat disagree	6,666666667
Strongly disagree	0
Croatia	
Strongly agree	75
Somewhat agree	25
Somewhat disagree	0
Strongly disagree	0
Germany	
Strongly agree	13,33333333
Somewhat agree	53,33333333
Somewhat disagree	13,33333333
Strongly disagree	20
Finland	
Strongly agree	66,66666667
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	0
Latvia	
Strongly agree	50
Somewhat agree	30
Somewhat disagree	20
Strongly disagree	
Luxembourg	
Strongly agree	64,28571429
Somewhat agree	35,71428571
Somewhat disagree	0
Strongly disagree	0



c) Breakdown by policy area (in %)

Competition	
Strongly agree	77,55102041
Somewhat agree	20,40816327
Somewhat disagree	2,040816327
Strongly disagree	0
Data protection	
Strongly agree	42,42424242
Somewhat agree	45,45454545
Somewhat disagree	6,060606061
Strongly disagree	6,060606061
Electronic communications	
Strongly agree	55,81395349
Somewhat agree	41,86046512
Somewhat disagree	2,325581395
Strongly disagree	
Energy	
Strongly agree	55,81395349
Somewhat agree	37,20930233
Somewhat disagree	4,651162791
Strongly disagree	2,325581395
Railways	
Strongly agree	60
Somewhat agree	33,33333333
Somewhat disagree	3,333333333
Strongly disagree	3,333333333
Prudential financial supervision	
Strongly agree	70
Somewhat agree	16,66666667
Somewhat disagree	13,33333333
Strongly disagree	0



d) Comments

- BE1: "European Competition Network is a well-functioning network."
- BE4: "See previous question."
- BG16: "in the European Competition Network"
- CZ1: "Our institution participates in EU-established networks and platforms but it does not facilitate our role of enforcement. The networks serve more as a consultative tool and a tool for cooperation and exchange of opinions and best practices between members. The role of enforcement lies with our institution only."
- CZ3: "Unclear question – which platforms does the author of the questionnaire have in mind?"
- CZ8: "I am not able to assess this."
- DE4: "European Competition Network with good exchange and coordination"
- DE6: "Participation in CEER is worthwhile and beneficial, particularly as it provides an opportunity to discourage the European Commission from adopting disadvantageous regulatory measures. However, CEER is currently heavily dominated by ACER, which significantly weakens CEER's role as the association of national regulatory authorities."
- DE7: "At present, there is no European body that adequately covers the field of public security."

- DE8: “Where EU-established networks and platforms facilitate the exchange of views and information and the development of best practices, they provide significant value in promoting a consistent approach at European level while preserving the independence of national authorities. However, if the governance arrangements or structure of such platforms enable EU institutions, particularly the European Commission, to exercise influence – for example through voting rights, involvement in determining the agenda, or shaping the work programme – this may pose a risk to the independence of the authorities concerned.”
- DE9: “EU institutions often focus more on Member States than on companies or specific areas of concern.”
- DE11: “Yes, among other things through the exchange of practical cases and, for example, in the context of mutual assistance.”
- EST1: “The issues discussed in the networks are not connected to my day-to-day work in any way.”
- EST6: “Not all of the platforms that have been created function appropriately, or they have become overly bureaucratic.”
- EST7: “Involvement and being informed.”
- EST9: “We keep ourselves informed, and the exchange of practices is always beneficial.”
- FIN9: “Through these, one can gain some insights and information on the issues.”
- FIN18: “Participation in various working groups significantly supports the implementation of our tasks; however, participation in multiple working groups also requires considerable resources.”
- FRA1: “Sometimes, cooperation is necessary simply to clarify the requirements set out in certain Directives or Regulations. More broadly, it is also essential to understand the practical implications of regulatory acts for consumers, producers, and market participants.”
- GRE2: “Please see previous answer”
- HUN2: “The ECN supports our professional development and contributes to our ability to make better-informed decisions.”
- HUN6: “The ECN supports knowledge and information sharing, which helps to strengthen our analyses and decisions.”
- IRE1: “The CCPC is a member of the European Competition Network”
- IT4: “The participation of the supervisory authority in networks or platforms established by the EU (or otherwise at a supranational level) contributes to a better understanding and more effective fulfilment of institutional tasks. However, such participation requires resources that are not always available within the supervisory authority.”

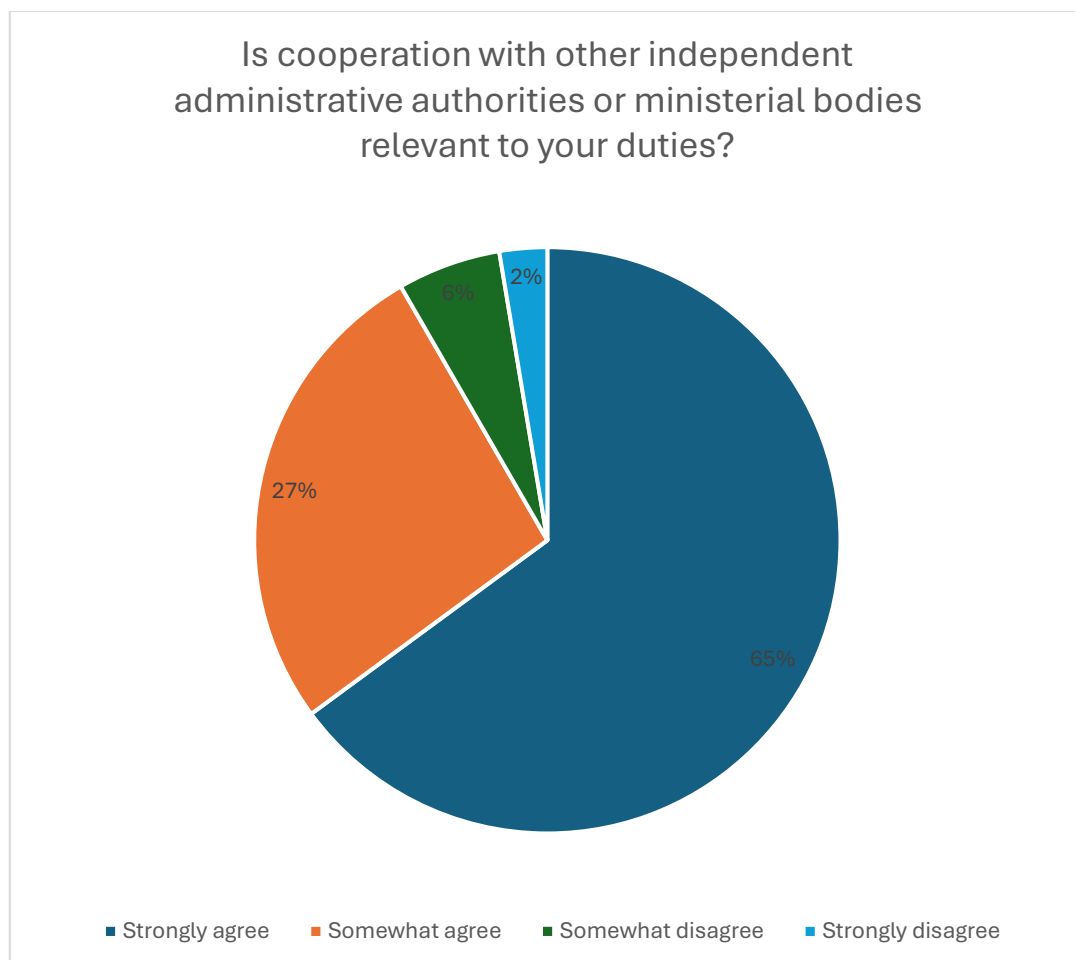
- LAT7: “member states has different perspective and culture, it is hard to get agreement with bigger countries, who often does not want to change approach according to the new technologies”
- LUX2: “Being a part of the European Board for Digital Services improves our application of DSA and our national law.”
- LUX14: “Yes, absolutely. The network (ECN) helps us make progress in handling cases and in determining the appropriate approach to follow in our investigations.”
- POL2: “Quite often, yes. They simplify administrative procedures, are intended to make processing faster, and allow procedures to be carried out under EU regulations rather than the national Code of Administrative Procedure. However, these platforms are often still underdeveloped—particularly the various registers—and are of limited use when it comes to searching for important information.”
- POL7: “Exchange of experience.”
- SPA1: “At times, there is a need for other, more practical tools.”
- SPA2: “The exchange of experiences and coordination are essential.”
- SWE1: “Sitting at the negotiating table provides a valuable understanding of European rules.”
- SWE4: “It is helpful to have clear agendas for larger meetings, so that participants can focus on the sessions that are most relevant to them and choose which hours to attend.”
- SWE7: “The work and exchange of information within CORTE is a good example. ELA is another.”

8) Is cooperation with other independent administrative authorities or ministerial bodies relevant to your duties?

This question wants to test whether national administrative authorities, whose setup is increasingly shaped up by EU legislation, cooperate with other national administrative bodies (e.g. ministries) despite their independence requirements.

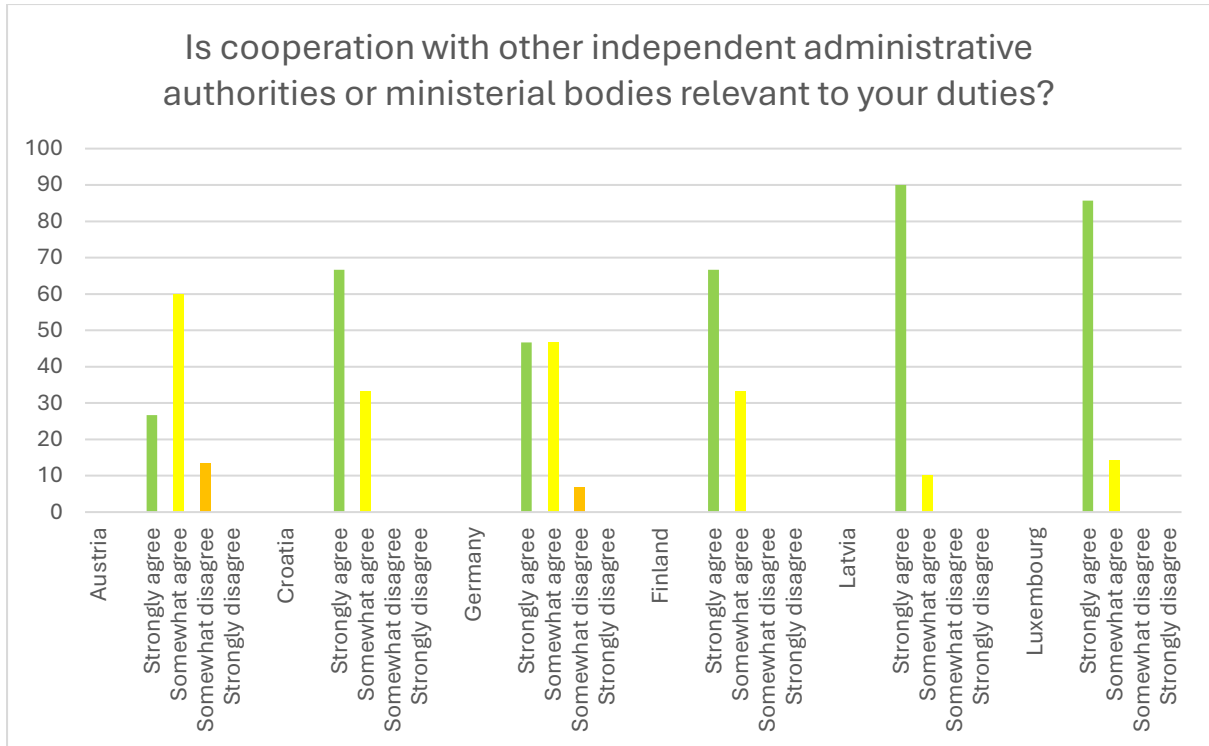
a) Aggregates

Strongly agree	148
Somewhat agree	61
Somewhat disagree	13
Strongly disagree	6
TOTAL	228



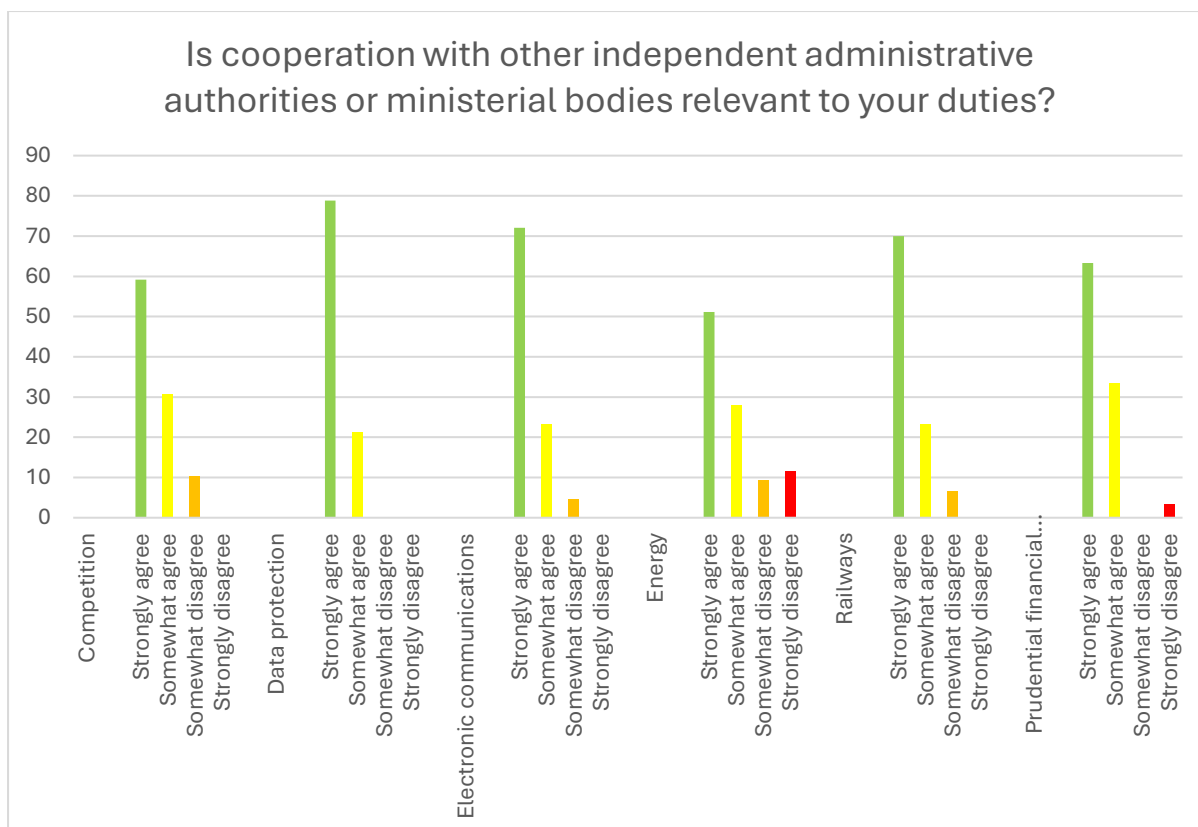
b) Breakdown by Member State (in %)

Austria	
Strongly agree	26,66666667
Somewhat agree	60
Somewhat disagree	13,33333333
Strongly disagree	0
Croatia	
Strongly agree	66,66666667
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	0
Germany	
Strongly agree	46,66666667
Somewhat agree	46,66666667
Somewhat disagree	6,66666667
Strongly disagree	0
Finland	
Strongly agree	66,66666667
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	0
Latvia	
Strongly agree	90
Somewhat agree	10
Somewhat disagree	0
Strongly disagree	0
Luxembourg	
Strongly agree	85,71428571
Somewhat agree	14,28571429
Somewhat disagree	0
Strongly disagree	0



c) Breakdown by policy area (in %)

Competition	
Strongly agree	59,18367347
Somewhat agree	30,6122449
Somewhat disagree	10,20408163
Strongly disagree	0
Data protection	
Strongly agree	78,78787879
Somewhat agree	21,21212121
Somewhat disagree	
Strongly disagree	
Electronic communications	
Strongly agree	72,09302326
Somewhat agree	23,25581395
Somewhat disagree	4,651162791
Strongly disagree	0
Energy	
Strongly agree	51,1627907
Somewhat agree	27,90697674
Somewhat disagree	9,302325581
Strongly disagree	11,62790698
Railways	
Strongly agree	70
Somewhat agree	23,33333333
Somewhat disagree	6,666666667
Strongly disagree	0
Prudential financial supervision	
Strongly agree	63,33333333
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	3,333333333



d) Comments

- AT5: “Federal Ministry of Finance, Ministry of Economic Affairs, Data Protection Authority, CERT, etc.”
- BE1: “Cooperation with sector regulators is very important to exercise of my duties.”
- BE4: “The NBB is an independent institution; however, it maintains strong and constructive relationships with other national, European, and international authorities.”
- BG1: “The Bulgarian Commission on Protection of Competition is an independent state body. The other state authorities do not have a role in the enforcement of EU competition law.”
- CRO5: “Cooperation with the Ministry of Finance and state agencies is necessary both for the exchange of information and for the procedures involved in adopting legislation and certain decisions.”
- CZ2: “Bundeskartellamt judgment of the CJEU”
- DE6: “For the work of the Federal Network Agency, cooperation with the ministry as well as with the financial and environmental authorities is of great

importance. In areas where the agency's independence is concerned, such cooperation must be conducted with considerable care and caution.”

- DE7: “Insofar as they perform tasks in the field of public security.”
- DE14: “The Federal Network Agency cooperates closely with the ministry, except in those areas in which, following the above-mentioned judgment of the Court of Justice of the European Union, the Agency enjoys independence from national political authorities as well.”
- EST6: “With the Ministry in the context of railway policy.”
- EST9: “We are open to cooperation, as enforcing the GDPR is not only about supervision, but also about prevention and cooperation.”
- FIN8: “One of our key tasks is to promote competition, and achieving this requires effective cooperation with the entire public administration and the business community.”
- FIN9: “It is particularly important among national authorities, but also among EU authorities.”
- FIN13: “The role involves close cooperation with corresponding independent authorities in other Member States.”
- FRA3: “BEREC, which succeeded the European Regulators Group established in 2002, was created in 2009 by a Regulation of the European Parliament and the Council to advise the European institutions and to promote cooperation among national regulatory authorities (NRAs). This Regulation was subsequently revised in December 2018. BEREC is composed of the national regulatory authorities of the EU Member States and, as non-voting participants, the authorities of the other countries of the European Economic Area (EEA), candidate countries for EU accession, and the European Commission. In the postal sector, the European Regulators Group for Postal Services (ERGP) was established by the European Commission on 10 August 2010. In the postal sector, the European Regulators Group for Postal Services (ERGP) was established by the European Commission on 10 August 2010. European cooperation is central to ARCEP's mission.”
- GRE2: “Mostly for collection of data”
- GRE7: “There is no formal cooperation framework or institutional network for my area of work, which is the electricity market on the islands.”
- HUN2: “To a very limited extent and only rarely, there is occasional cooperation with the Hungarian Central Statistical Office, the Hungarian National Bank, or the Public Procurement Authority in relation to specific cases or projects.”
- HUN6: “Occasionally, but very rarely (e.g. KSH, NAV, NAIH, NGM).”
- IT3: “Provided that it takes place with due respect for the respective roles.”
- LUX2: “In its capacity as digital services coordinator, the Authority cooperates with the competent national authorities.”

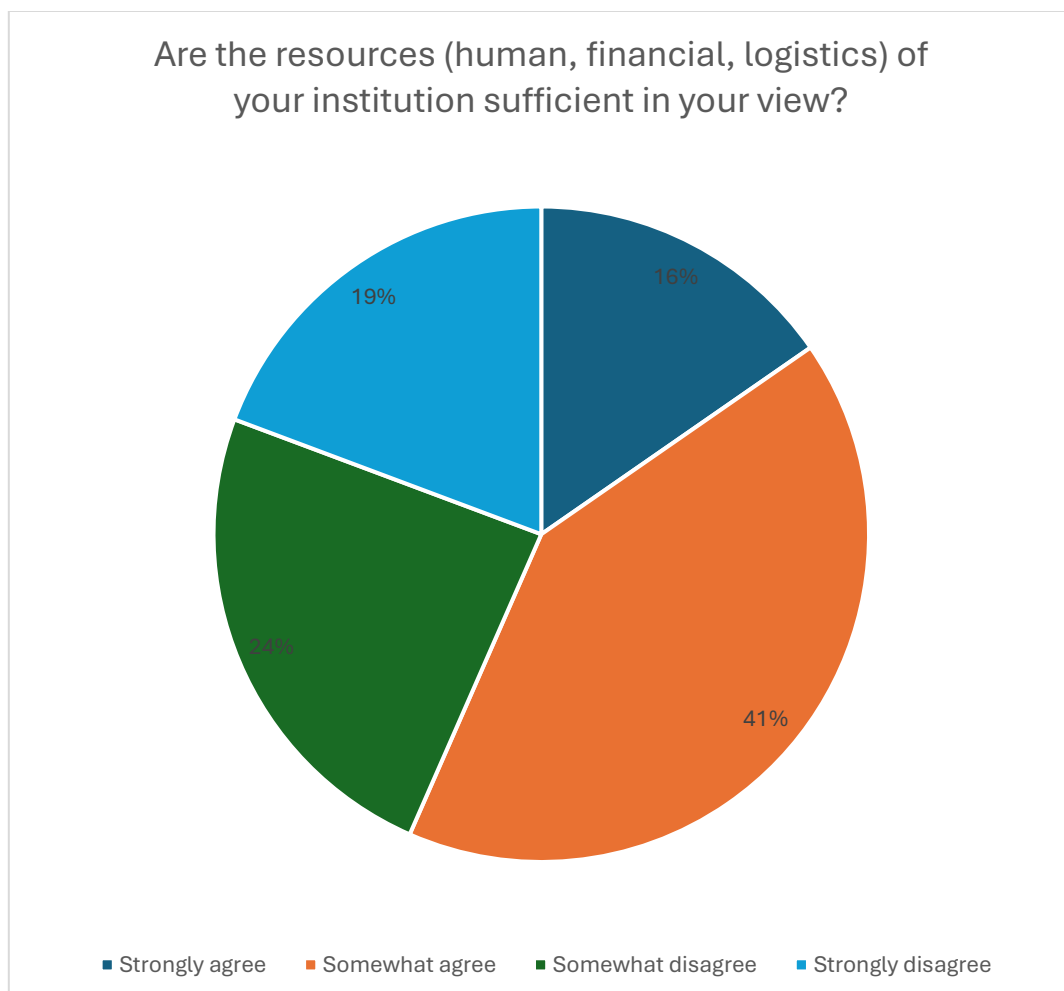
- LUX14: “Yes, absolutely. With regard to cooperation with our counterparts in other Member States, I would refer you to Article 22 of Regulation (EC) No 1/2003.”
- POL2: “For example, processing applications relating to cross-border activities involving different EU Member States, such as obtaining approvals, permits, or authorisations for investments and other projects.”
- POL7: “It is essential for fulfilling the obligations imposed on the Member State under EU law.”
- RO4: “Cooperation provides the foundation for identifying and sharing best practices and regulatory approaches developed in the Member States.”
- SPA1: “Coordination and cooperation at both the European and national levels are needed to ensure that the transposition of legislation remains consistent with the European rules from which it originates.”
- SWE1: “Both at national and international level.”

9) Are the resources (human, financial, logistics) of your institution sufficient in your view?

This question wants to test whether Member States, which still hold the means of financing for independent administrative authorities, allow sufficient resources to the bodies trusted with the enforcement of EU rules.

a) Aggregates

Strongly agree	35
Somewhat agree	94
Somewhat disagree	55
Strongly disagree	44
TOTAL	228



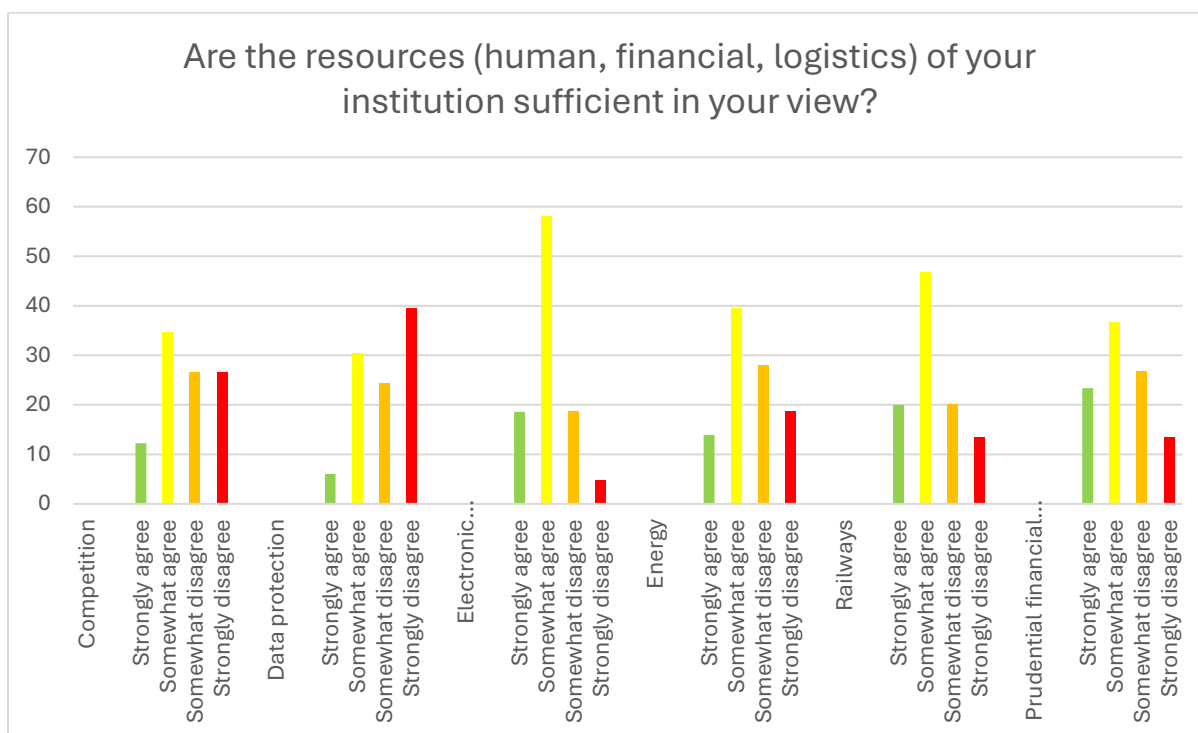
b) Breakdown by Member State (in %)

Austria	
Strongly agree	6,66666667
Somewhat agree	53,33333333
Somewhat disagree	26,66666667
Strongly disagree	13,33333333
Croatia	
Strongly agree	58,33333333
Somewhat agree	25
Somewhat disagree	0
Strongly disagree	16,66666667
Germany	
Strongly agree	20
Somewhat agree	73,33333333
Somewhat disagree	6,66666667
Strongly disagree	0
Finland	
Strongly agree	5,55555556
Somewhat agree	11,11111111
Somewhat disagree	77,77777778
Strongly disagree	88,88888889
Latvia	
Strongly agree	50
Somewhat agree	35
Somewhat disagree	15
Strongly disagree	0
Luxembourg	
Strongly agree	14,28571429
Somewhat agree	42,85714286
Somewhat disagree	35,71428571
Strongly disagree	7,142857143



c) Breakdown by policy area (in %)

Competition	
Strongly agree	12,24489796
Somewhat agree	34,69387755
Somewhat disagree	26,53061224
Strongly disagree	26,53061224
Data protection	
Strongly agree	6,060606061
Somewhat agree	30,3030303
Somewhat disagree	24,24242424
Strongly disagree	39,39393939
Electronic communications	
Strongly agree	18,60465116
Somewhat agree	58,13953488
Somewhat disagree	18,60465116
Strongly disagree	4,651162791
Energy	
Strongly agree	13,95348837
Somewhat agree	39,53488372
Somewhat disagree	27,90697674
Strongly disagree	18,60465116
Railways	
Strongly agree	20
Somewhat agree	46,66666667
Somewhat disagree	20
Strongly disagree	13,33333333
Prudential financial supervision	
Strongly agree	23,33333333
Somewhat agree	36,66666667
Somewhat disagree	26,66666667
Strongly disagree	13,33333333



d) Comments

- AT4: “However, this issue is repeatedly discussed. (For example, the automatic indexation of the maximum budget based on the consumer price index (CPI) is criticised, although this actually supports financial independence.) In postal regulation, budgetary resources are becoming tight.”
- AT5: “Prioritisation is necessary, as not all agendas at EU level (such as participation in working groups, etc.) can be followed up or supported, among other reasons due to resource constraints.”
- AT13: “Budgetary constraints and reductions in available resources often hinder the effective performance of supervisory tasks.”
- BE1: “The Belgian Competition Authority remains under-funded to carry out its missions fully, though the government has indicated a willingness to reinforce it. The comparison with sector regulators is very telling.”
- BE2: “The resources (human, financial, logistical) of the CREG are generally adequate to fulfill its current responsibilities. However, with the increasing tasks and competencies that regulators are taking on, particularly as a result of evolving EU legislation, there is a growing need for additional resources. As the scope of our work expands to include more complex regulatory frameworks, ensuring sufficient personnel, funding, and logistical support becomes more

crucial. While the CREG strives to manage with its available resources, the growing demands may require further adjustments to maintain efficiency and effectiveness in fulfilling both national and EU obligations.”

- CZ1: “Our institution is capable of delivering its goals but more human resources would increase the effectivity and improve the time management of everyone involved.”
- CZ2: “low staff; low payments”
- CZ3: “Insufficient.”
- CZ8: “The significant increase in responsibilities since 2020 has not been accompanied by any increase in capacity.”
- DE4: “There is insufficient staff to handle the wide range of proceedings, including mergers, abuse of dominance, and cartels.”
- DE6: “Staffing resources are generally sufficient. However, a considerable share of these resources is devoted to tasks that are perceived as unnecessary, some of which are prescribed by the EU.”
- DE12: “This is the case with regard to staffing and financial resources. However, our authority could be better equipped with technical tools for data analysis (particularly in terms of digitalisation).”
- EST4: “Supervisory requirements exceed the authority’s budgetary resources.”
- EST6: “In the railway sector, human resources need to be strengthened. The authority is making improvements in this area.”
- EST7: “The growth of legal awareness, as well as increasing bureaucracy, creates a need for additional resources.”
- EST9: “We are one of the smallest authorities in Estonia; at the same time, the workload is increasing every year.”
- EST11: “With the growing importance of data use and, consequently, the increasing need for personal data protection, strengthening the authority’s capacity through additional resources would be essential.”
- FIN8: “Cuts are being made across the Finnish public administration, and we are required to reduce our staff, which affects our ability to address infringements of competition law.”
- FIN13: “The economic situation and the allocated funding require strong prioritisation, meaning that not all tasks can be carried out to the desired extent.”
- FIN18: “Securing resources through the state budget for new tasks has been uncertain. The agency’s budget funding has been reduced.”
- FRA1: “The crisis has placed numerous additional responsibilities on regulatory authorities. At the same time, while further simplification of the regulatory framework may be appropriate, some complexity stems from national circumstances rather than from EU legislation itself.”
- GRE2: “We need a significant reinforcement of our staff”
- HUN2: “Financial resources are rather limited.”

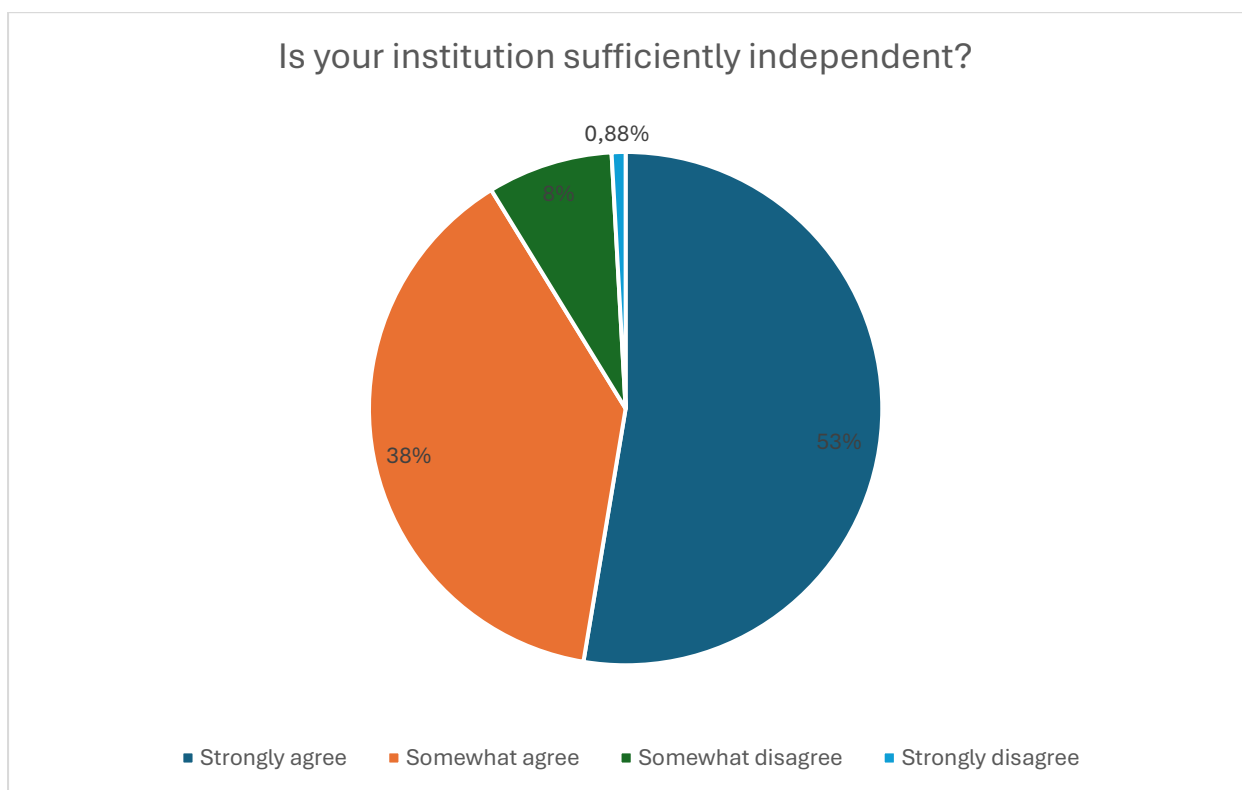
- HUN6: “The available resources are just sufficient for day-to-day operations, but somewhat greater financial resources would be beneficial. At the same time, it is also true that there are many unnecessary expenditures and that human resources are not allocated optimally. Therefore, the organisation could also be made more efficient.”
- IRE2: “The process of obtaining approval for new human resource for new functions is too cumbersome, too slow and entails an inappropriate degree of ministerial micro management. In some key areas salary bands are out of step with market realities.”
- IT3: “It is the necessary skills and expertise that are lacking in the labour market.”
- IT4: “With particular regard to sectors subject to rapid technological change (e.g. the impact of AI) or involving exploratory and experimental activities (e.g. regulatory sandboxes), the available resources may prove insufficient.”
- LIT6: “The very large number of areas regulated at EU level creates challenges, as Lithuania is a small country and it is not possible to have specialists for all areas.”
- LUX2: “The Authority brings together 3 full-time equivalents. It plans to increase its human resources in the upcoming months/years.”
- LUX14: “No, with regard to human resources.”
- MAL1: “This is the one area where occasionally we are negatively impacted by policies and administrative processes adopted by the public administration. For example, our HR plan, salary structure, etc are subject to Government's approval”
- POL2: “I generally agree. However, the growing level of bureaucracy and the increasing requirements placed on both applicants and public authorities are making it difficult to attract and retain experts in these fields. Salaries in the private sector are significantly more competitive than those in public administration. Yet skilled professionals are needed to understand applications, process them properly, issue the appropriate decisions, and provide well-reasoned justifications for those decisions.”
- POL3: “It should be borne in mind that the availability of resources depends on a range of factors beyond the control of the competent authority, including labour market conditions, the size of the Member State (for example, the resources available in Poland or France differ significantly from those in Estonia or Malta), and the applicable legal and budgetary frameworks. Imposing the same obligations on all competent authorities without taking these factors into account does not guarantee that those obligations will be enforced consistently across the European Union.”
- SWE1: “Sweden invests less in financial supervision than other comparable EU countries.”

- SWE4: “The DORA regulations are extensive and apply to all of our supervised entities. We would need to be several times more numerous to handle this work effectively.”

10) Is your institution sufficiently independent?

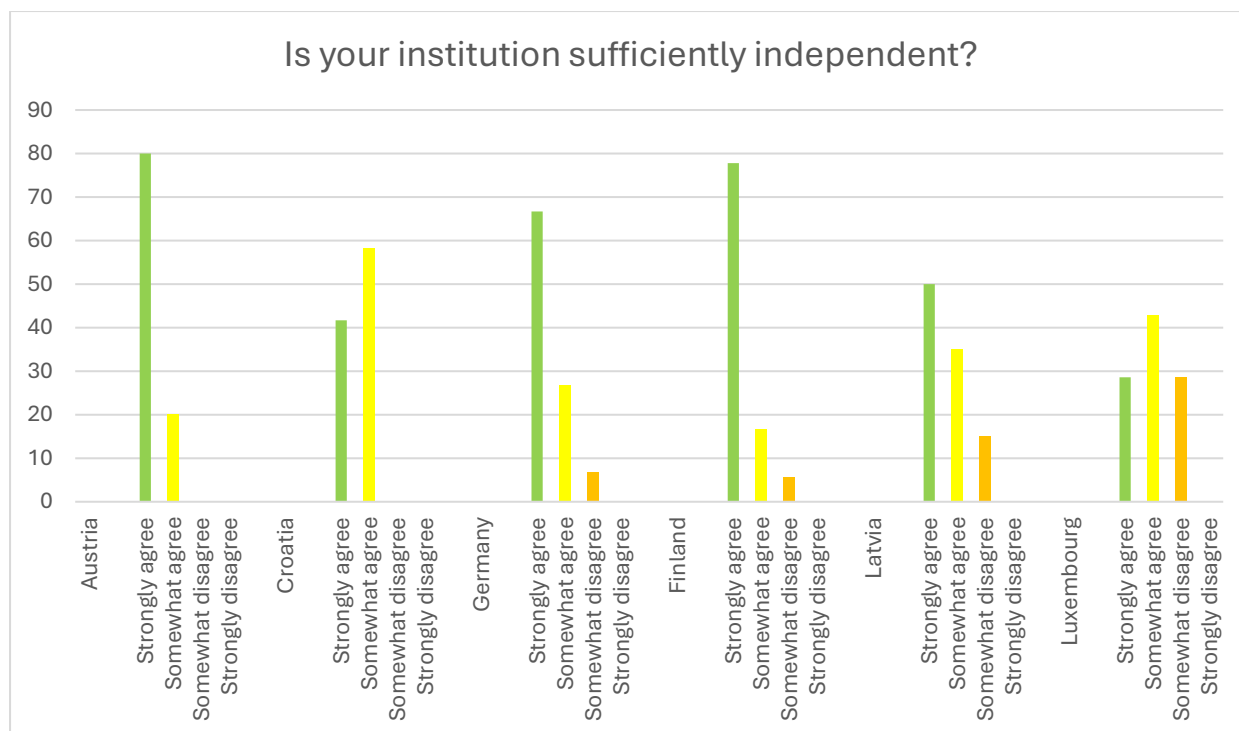
a) Aggregates

Strongly agree	120
Somewhat agree	88
Somewhat disagree	18
Strongly disagree	2
TOTAL	228



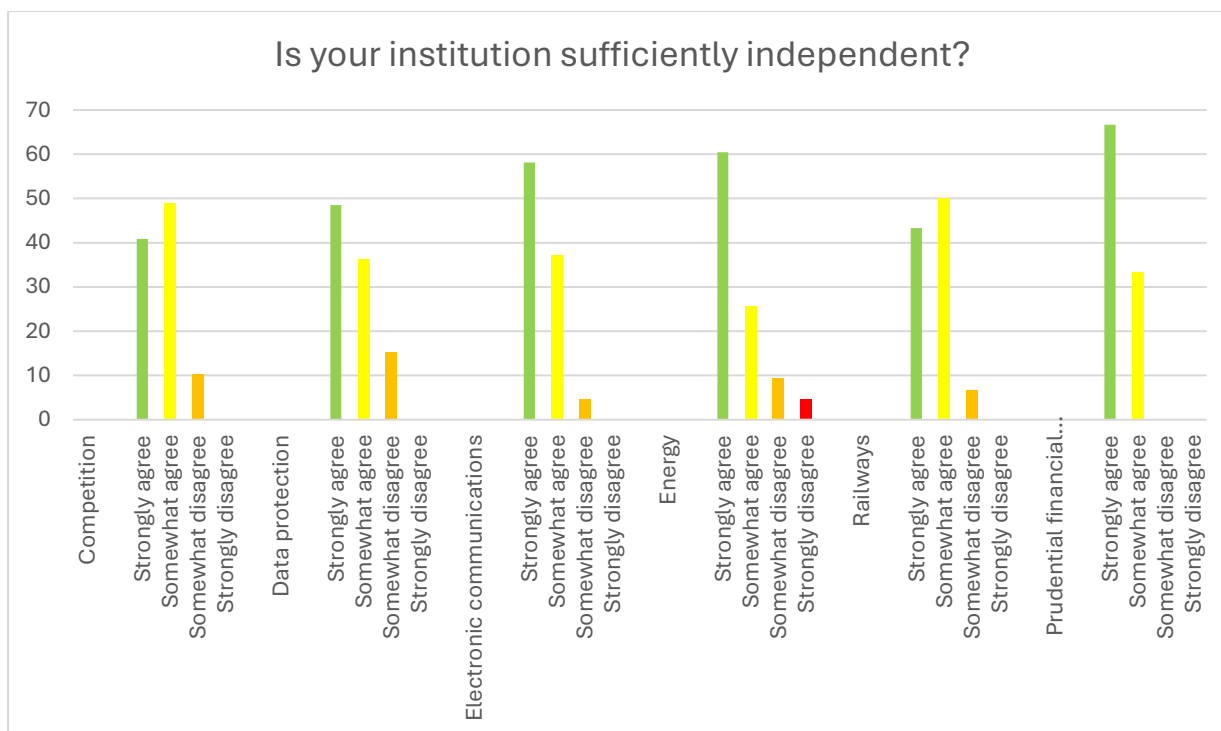
b) Breakdown by Member State (in %)

Austria	
Strongly agree	80
Somewhat agree	20
Somewhat disagree	0
Strongly disagree	0
Croatia	
Strongly agree	41,66666667
Somewhat agree	58,33333333
Somewhat disagree	0
Strongly disagree	0
Germany	
Strongly agree	66,66666667
Somewhat agree	26,66666667
Somewhat disagree	6,66666667
Strongly disagree	0
Finland	
Strongly agree	77,77777778
Somewhat agree	16,66666667
Somewhat disagree	5,55555556
Strongly disagree	0
Latvia	
Strongly agree	50
Somewhat agree	35
Somewhat disagree	15
Strongly disagree	0
Luxembourg	
Strongly agree	28,57142857
Somewhat agree	42,85714286
Somewhat disagree	28,57142857
Strongly disagree	0



c) Breakdown by policy area (in %)

Competition	
Strongly agree	40,81632653
Somewhat agree	48,97959184
Somewhat disagree	10,20408163
Strongly disagree	0
Data protection	
Strongly agree	48,48484848
Somewhat agree	36,36363636
Somewhat disagree	15,15151515
Strongly disagree	0
Electronic communications	
Strongly agree	58,13953488
Somewhat agree	37,20930233
Somewhat disagree	4,651162791
Strongly disagree	0
Energy	
Strongly agree	60,46511628
Somewhat agree	25,58139535
Somewhat disagree	9,302325581
Strongly disagree	4,651162791
Railways	
Strongly agree	43,33333333
Somewhat agree	50
Somewhat disagree	6,666666667
Strongly disagree	0
Prudential financial supervision	
Strongly agree	66,66666667
Somewhat agree	33,33333333
Somewhat disagree	0
Strongly disagree	0



d) Comments

- CRO1: "Theory and practice of independence may sometimes be distant"
- CZ8: "Legally, yes; in practice, no. The organisation is too concerned about government authorities and the influence of regulated entities when making decisions."
- DE4: "The decision divisions of the Federal Cartel Office decide cases in panels of three members, similar to a Higher Regional Court."
- DE12: "Our institution is subject to the legal and technical supervision of the Ministry of Finance."
- DK3: "National legislation and executive orders are in conflict with EU Regulations and significantly limit my ability to comply with, among others, the electricity and gas market Regulations, which are otherwise directly applicable."
- EST6: "There is no doubt about it."
- EST9: "Independence is ensured through a separate budget and a legally regulated procedure for appointing the Director General."
- EST11: "Budgetary constraints."
- FIN2: "Independence could be stronger if the ministerial representatives from the board were removed"
- FIN9: "FIN-FSA is not dependent on budgetary funding, which helps preserve its independence."

- FIN14: “The authority is not financially independent, as the Ministry of Finance and the Parliament decide on the budget and the available appropriations.”
- FRA1: “We are, of course, regularly approached by stakeholders (including, at times, EU stakeholders), but these interactions are more in the nature of exchanges than genuine pressure in the strict sense of the term. More fundamentally, the issue of independence lies in the regulator's ability to make full use of the powers available to it in order to exercise its independence. This is an essential issue, and attempts to challenge that independence are a recurring concern—not only from political authorities.”
- HUN2: “The Hungarian political system does not allow for full independence in practice. We are independent in certain cases that are not politically sensitive, but there are also actors against whom we do not initiate proceedings or carry out competition advocacy activities, while in other cases we take a “tough” approach even where such action may be less justified. In other words, there is a double standard.”
- HUN6: “The legal safeguards for independence are formally in place; however, senior management closely follows political developments and seeks to adapt accordingly. In certain merger assessments, political considerations may outweigh professional assessments, and there have been instances where mergers were approved following interventions from high-level political circles.”
- IRE2: “Exception of resource constraints”
- IT3: “It depends on the authority and standing of the individuals appointed to serve on the Board of Directors (which consists of three members).”
- LIT6: “We are the implementer of the policy formulated by the policymaker.”
- LUX14: “Yes, it is sufficiently independent because the members of the College are selected independently. However, more could be done to further strengthen its independence.”
- MAL1: “Autonomy on human resource matters is somewhat limited due to the Authority being subjected to central Government's approval (as per examples provided in the previous answer)”
- SWE1: “Swedish authorities have a tradition of independence from the government that dates back more than 350 years.”
- SWE7: “It depends on what is meant by the term “institution.”