

(English version)

**Priority question for written answer P-002161/26
to the Commission
Carla Tavares (S&D)
(27 May 2026)**

Subject: AICEP: conflict of interest in management and control systems for Portugal 2030

AICEP (Agência para o Investimento e Comércio Externo de Portugal, E.P.E. — the Portuguese Agency for Investment and Foreign Trade) has always applied the principle of the separation of functions, laid down in Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021, and incorporated into national regulations in the ‘Governance Model for EU Funds for the Programming Period 2021-2027’, defined by Decree-Law No 5/2023 of 25 January, which explicitly prescribes ‘the primacy of the strict separation of the functions of analysis and decision-making, payment, accounting and audit and control’, through two autonomous directorates, headed by separate administrators: a Directorate for Incentive Analysis and a Directorate for Incentive Verification.

The current AICEP board of directors recently decided [AICEP Service Order No 15/2025 of 3 October] to merge the management of funds under AICEP’s responsibility into a single department.

1. What view does the Commission take of this decision to consolidate the analysis and disbursement of European funds into a single decision-making line, and does this decision ensure that the designated bodies meet the criteria set out in the rules?
2. What steps should be taken to improve transparency and mitigate risks and conflicts of interest?
3. What are the best practices to follow in this regard?

Submitted: 27.5.2026

**Answer given by Executive Vice-President Fitto on behalf of the European Commission
(29 June 2026)**

The separation of functions in managing EU funds is an important element to prevent conflicts of interest and ensure transparency, accountability and sound financial management.

While the Commission has no specific information on the Agência para o Investimento e Comércio Externo de Portugal (AICEP)’s recent reorganisation, general principles applicable to the management of EU funds require adequate operational separation between project evaluation, expenditure verification and payment authorisation, even if these functions fall under the same directorate.

Segregation at the operational level to mitigate risks can be ensured via:

- Separate teams for each role,
- Defined workflows preventing overlap,
- Strong internal controls (e.g. independent reviews, approval chains),
- Documented audit trails for full traceability.

The Portuguese audit authority is responsible for assessing the setup of the management and control system and its effective functioning in line with the applicable criteria, including tasks delegated to intermediate bodies like AICEP, and reporting its findings to the Commission.

The Commission will continue to monitor the implementation of the EU funds in Portugal and may request corrective actions if deficiencies are found.
