

(English version)

**Question for written answer E-000529/25
to the Commission
Sander Smit (PPE), Alexander Bernhuber (PPE)
(5 February 2025)**

Subject: Full transparency on the green non-governmental organisation lobbying scandal in the Parliament

Recent reports have revealed that non-governmental organisations, funded and instructed by the Commission, have engaged in lobbying activities targeting Members of the European Parliament ⁽¹⁾. Such practices, combined with previous incidents — involving lobbying ⁽²⁾, selective information sharing ⁽³⁾, intimidation ⁽⁴⁾ and targeted campaigns directed at EU citizens in strategic Member States ⁽⁵⁾ — raise serious concerns about the separation of powers, institutional balance, transparency, potential Treaty violations ⁽⁶⁾ and the adequacy of internal codes of conduct ⁽⁷⁾ as well as impartiality of staff ⁽⁸⁾. These developments fuel public distrust in the Commission — in particular in its efforts to combat political interference and disinformation.

1. Will the Commission disclose a full breakdown of expenditures related to legislative proposals and promotional activities, both before and after adoption, including those channelled through third parties?
2. Does the Commission acknowledge that its actions may not only be ‘inappropriate’ ⁽⁹⁾ but could also constitute a violation of the *trias politica*, EU Treaties and codes of conduct and commit to an independent investigation?
3. Is the Commission considering updating the codes of conduct or introducing an oath of impartiality for all Commission staff or other measures to restore public trust?

Supporter ⁽¹⁰⁾

Submitted: 5.2.2025

**Answer given by Mr Serafin on behalf of the European Commission
(23 April 2025)**

The Commission adheres strictly to its transparency obligations as outlined in the Financial Regulation ⁽¹⁾, its Article 38 requires publishing information about recipients of funds financed from the EU budget.

All required information on recipients of EU funding, including the names of recipients and amounts are already public and available in the Financial Transparency System ⁽²⁾. The objectives and results of the projects may be found on the Funding and Tenders Portal ⁽³⁾.

Furthermore, interest representatives that register in the Transparency Register (TR) ⁽⁴⁾ as not representing commercial interests, which would typically include non-governmental organisations (NGOs), are required to report their lobbying activities and declare their main funding sources as well as the amount of each contribution above EUR 10 000 exceeding 10% of their total budget and the name of the contributor in their registrations in the TR.

The Commission's assessment confirms that all ongoing grant agreements are in full compliance with the relevant legal framework, as adopted by the European Parliament and the Council. The Commission does not require NGOs to lobby against or to support specific EU policy initiatives.

The existing regulatory framework already sets out clear obligations regarding ethics and integrity, both for Commissioners and staff members.

¹ Telegraaf. (22 January 2025). Lobbychandaal in Brussel: EU betaalde milieuclubs in het geheim voor promotie van groene plannen Timmermans.

² Telegraaf. (7 June 2023). Europarlementariërs woest om lobby natuurplan Frans Timmermans: Riekt naar manipulatie.

³ EPP Group. (18 October 2021). Timmermans, stop hiding information about Farm to Fork Strategy!

⁴ Brusselse Nieuwe. (8 June 2023). Christendemocraten (EVP): ‘Timmermans bedreigt en chanteert Europarlementariërs’.

⁵ noyb. (16 November 2023). noyb files complaint against EU Commission over targeted chat control ads.

⁶ Article 17 Treaty on European Union, Article 245 Treaty on the Functioning of the European Union.

⁷ European Commission. (2018). Code of conduct for the Members of the European Commission.

⁸ European Union. (2016). Staff regulations of officials of the European Union and conditions of employment of other servants of the European Union.

⁹ European Parliament (2025). Verbatim report of proceedings 22 January 2025 — Strasbourg.

¹⁰ This question is supported by a Member other than the authors: Jessika Van Leeuwen (PPE)

⁽¹⁾ https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202402509

⁽²⁾ <https://ec.europa.eu/budget/financial-transparency-system/analysis.html>

Example: go to ‘Analyse’ and choose the criteria of interest (e.g. year, EU programme, type of contract, type of organisation). (The annual publications are based on Article 38 of the Financial Regulation whereby data on recipients is not disclosed for very low value contracts below EUR 15 000 and where disclosure risks threatening the rights and freedoms of the persons or entities).

⁽³⁾ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-results?isExactMatch=true&order=DESC&pageNumber=1&pageSize=10&sortBy=title>

Example: go to Home>Projects & results>EU Funded projects>choose the project of interest.

⁽⁴⁾ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021Q0611\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021Q0611(01))

Rules on the avoidance of conflicts of interest and the obligation to act with impartiality are well established, as is the reporting obligation for staff when their impartiality may be compromised.

In such cases the institution may impose mitigating measures. In cases where there is evidence of a breach, the Commission has established clear procedures for internal administrative inquiries and disciplinary action and where necessary refers the matter for further examination to the competent investigative bodies and authorities.
