

EN

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Answer given by Mr Serafin
on behalf of the European Commission
(26.6.2025)

There are rules ensuring the visibility of EU financial support. In line with point (h) of Article 204(2) of the Financial Regulation¹, grant agreements typically include provisions governing the visibility of the Union financial support, except in duly justified cases where public display is not possible or appropriate. Article 17 of the Commission's Model Grant Agreement² (MGA) refers to an obligation to acknowledge EU support through the display of the European flag and a funding statement ('(Co-)Funded by the European Union'). These rules do not require organisations funded by the EU to 'publicly label their financial dependence on EU funds'.

There is no legal requirement for the Commission to collect information on 'voluntary' publication of annual reports on funding sources and project funding by civil society organisations. However, Article 38 of the Financial Regulation³ requires the Commission to publish information about EU fund recipients, including the amounts of EU support committed, in the Financial Transparency System⁴.

Interest representatives that register in the Transparency Register⁵ as not representing commercial interests, which would typically include non-governmental organisations (NGOs), are required to report their lobbying activities and disclose 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 Transparency Register⁶.

The Commission proactively shares the objectives and outcomes of funded projects on the Funding & Tenders Portal⁷.

The Commission refers to its previous answers regarding advocacy activities implemented by NGOs⁸. The Commission has issued guidance⁹, clarifying which activities should not be mandated as a condition for EU financing. Support for activities related to policy

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

² See, for example, the Justice programme MGA: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/just/agr-contr/general-mga_just_en.pdf.

³ https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202402509.

⁴ <https://ec.europa.eu/budget/financial-transparency-system/index.html>.

⁵ https://transparency-register.europa.eu/index_en.

⁶ https://transparency-register.europa.eu/searchregister-or-update/search-register_en.

⁷ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/home>.

⁸ https://www.europarl.europa.eu/doceo/document/E-10-2025-000838-ASW_EN.html;

https://www.europarl.europa.eu/doceo/document/E-10-2025-000296-ASW_EN.html;

https://www.europarl.europa.eu/doceo/document/P-10-2025-000280-ASW_EN.html;

https://www.europarl.europa.eu/doceo/document/P-10-2025-000595-ASW_EN.html;

https://www.europarl.europa.eu/doceo/document/P-10-2025-000351-ASW_EN.pdf;

https://www.europarl.europa.eu/cmsdata/291733/Replies%20to%20questionnaire%20addressed%20to%20Csr%20responsible%20for%20Budget%20and%20Administration_final.pdf.

⁹ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/guidance-funding-dev-impl-monit-enforce-of-eu-law_en.pdf.

development and policy implementation, including enhancing the involvement of pluralistic civil society organisations, remains an important and legitimate funding objective, as designed by the co-legislators in Union programmes such as the LIFE programme for the environment and climate action¹⁰.

¹⁰ https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/programme-environment-and-climate-action-life_en.