

(English version)

**Question for written answer E-003285/25  
to the Commission  
Virginie Joron (Pfe)  
(25 August 2025)**

*Subject:* Transparency of the funding of stakeholders involved in drafting online election integrity guidelines

In March 2024, the Commission issued guidelines for providers of very large online platforms (VLOPs) and very large online search engines (VLOSE) on mitigating systemic risks for electoral processes <sup>(1)</sup>. Paragraph 8 of the guidelines states that the Commission received 77 replies as part of the ‘exploratory consultation’ it had organised during the drafting process <sup>(2)</sup>.

One of the parties involved in the consultation, the European Partnership for Democracy (EPD), claims on its website that it received EUR 5 747 583 from the Commission in 2023 <sup>(3)</sup>. However, the Commission’s statement in the EU Transparency Register indicates that it financed EPD to the tune of EUR 4 510 501 in 2023 <sup>(4)</sup>, while the Financial Transparency System reports that this sum totals EUR 14 680 000 <sup>(5)</sup>.

In the interests of clarity and transparency, could the Commission answer the following questions about the parties involved in this exploratory consultation:

1. How many of the 77 respondents has the Commission financed by means of grants, contracts and other funding instruments?
2. How much funding did these parties receive in total from the Commission in 2023?
3. How much funding was allocated to EPD in 2023, and how does the Commission explain the discrepancies outlined above?

Submitted: 25.8.2025

**Answer given by Executive Vice-President Virkkunen on behalf of the European Commission  
(24 November 2025)**

An exploratory stakeholder consultation on the draft Digital Services Act guidelines on the mitigation of systemic risks for electoral processes was opened from 8 February 2024 to 7 March 2024 and gathered 77 contributions.

The Financial Transparency System (FTS) <sup>(1)</sup> makes available to the public information on recipients of funds financed from the EU budget and implemented under direct and indirect management mode.

Annex I includes an extract from the FTS detailing the funding awarded to the European Partnership for Democracy (EPD) in 2023, amounting to EUR 6 168 555.

The annex provides a breakdown of the funding by programme name, the purpose of the expenditure and the department responsible for awarding the funds.

The sum of EUR 14 680 000 identified by the Honourable Member in the FTS indicates a significant discrepancy, as it reflects total payments consumed at the commitment level for entire projects in 2023, some of which include multiple beneficiaries.

To determine the portion specifically awarded to EPD, one should refer to the beneficiary’s contracted amount (i.e. EUR 6 168 555), which represents the amount of the budget reserved to cover the costs of a single legal entity for the implementation of a given project based on the beneficiary’s role and responsibility.

Differences between commitments contracted and effectively used can happen during the lifespan of the project, depending on the conditions established in the contract.

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<sup>1</sup> [https://eur-lex.europa.eu/legal-content/FR/TXT/HTML/?uri=OJ:C\\_202403014](https://eur-lex.europa.eu/legal-content/FR/TXT/HTML/?uri=OJ:C_202403014)

<sup>2</sup> Ibid.

<sup>3</sup> <https://epd.eu/who-we-are/funding/>

<sup>4</sup> [https://transparency-register.europa.eu/searchregister-or-update/organisation-detail\\_fr?id=679535014238-83](https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_fr?id=679535014238-83)

<sup>5</sup> <https://ec.europa.eu/budget/financial-transparency-system/analysis.html>

<sup>(1)</sup> <https://ec.europa.eu/budget/financial-transparency-system/analysis.html>