

EN

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Answer given by Mr McGrath
on behalf of the European Commission
(15.12.2025)

The Commission presented in December 2023 a proposal for a Directive on interest representation carried out on behalf of third countries¹, currently being discussed by the co-legislators. The proposed requirements would apply to entities carrying out interest representation on behalf of third countries, regardless of their legal form. The European Democracy Shield² builds on existing measures to support the resilience of our democracies, including by supporting work with the Member States on the transparency and integrity of funding in politics.

The Commission adheres strictly to its transparency obligations as outlined in Article 38 of the Financial Regulation³, which requires publishing information about recipients. Information about EU fund recipients, including NGOs, is published on the Financial Transparency System.⁴ The Commission proactively shares the objectives and outcomes of funded projects on the Funding & Tenders Portal⁵. Furthermore, interest representatives that register in the Transparency Register as not representing commercial interests, which could typically include NGOs, are required to report their lobbying activities and disclose their main funding sources in the Transparency Register⁶.

The Commission undertook a screening exercise, covering also grants to environmental NGOs financed under the LIFE Programme, and found that advocacy towards EU decision-makers under grant agreements does not breach any contractual obligations. Moreover, the Commission issued comprehensive guidance⁷ applicable to all spending programs to clarify which activities should not be mandated as a requirement or condition for EU financing.

¹ COM(2023) 637 final.

² JOIN(2025)791 final.

³ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the EU (recast), ELI:

<http://data.europa.eu/eli/reg/2024/2509/oj>.

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

⁵ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/home>.

⁶ https://transparency-register.europa.eu/index_en.

⁷ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/guidance-funding-dev-impl-monit-enforce-of-eu-law_en.pdf.