

(English version)

**Question for written answer E-004905/25
to the Commission
Alexander Jungbluth (ESN)
(10 December 2025)**

Subject: Follow-up question to Question E-003339/2025

1. Is the declaration of honour that applicants are required to sign declaring whether they are in a situation of grave professional misconduct publicly available? If not, will the Commission make it available?
2. Under the Early Detection and Exclusion System, has the Commission excluded unreliable economic operators and organisations from EU funding before the award, during the implementation or after the project ends on the grounds of incitement to discrimination, hatred or violence? Has a list of such entities been drawn up? If so, which entities are on that list?
3. What is the Commission's exact understanding of 'voluntary, independent from government, non-profit organisation' ⁽¹⁾, in particular with regard to independence from state or EU funding?

Submitted: 10.12.2025

**Answer given by Mr Serafin on behalf of the European Commission
(17 February 2026)**

The declaration of honour required from beneficiaries based on Article 139 of the Financial Regulation is publicly available on the EU Funding & Tenders Portal, under Guidance and documents ⁽¹⁾.

The exclusion criteria of incitement to discrimination, hatred or violence, as an explicit indent under the grave professional misconduct ground of exclusion applies to facts occurred after the entry into force of the 2024 Financial Regulation, as of 30 September 2024 ⁽²⁾.

However, prior to this date, breaches of EU values could already lead to exclusion under the exclusion grounds of grave professional misconduct or significant deficiencies in complying with the main obligations in performing an EU financed contract. The information stored in the Early Detection and Exclusion System (EDES) database is generally confidential.

Publication is only possible on a case-to-case basis to reinforce the measure's deterrence effect within the limits of the Financial Regulation.

As a result, there is no publicly available list of entities excluded specifically for promoting discrimination, hatred or violence. Anonymised information on exclusion cases is published annually as an annex to the report on the protection of the EU's financial interests ⁽³⁾.

Regarding recommendation 1 under the European Court of Auditors' (ECA) report 11/2025 ⁽⁴⁾ on the definition of a non-governmental organisation (NGO), the Commission accepted to explore how the notion of 'independence from government' for a NGO could be further clarified, keeping in mind that it should not lead to reduced accessibility of EU funds in some Member States where the NGOs definition might differ (as acknowledged by the ECA) ⁽⁵⁾. Further clarifications of the notion of NGO are currently being explored.

¹ https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202402509, S. 35.

⁽¹⁾ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/how-to-participate/reference-documents;programCode=H2020?programmePeriod=2021-2027> > Guidance and documents > Reference documents > select programme > Templates & forms > Grant agreement preparation templates.

⁽²⁾ See Article 138(1)(c)(vi) of 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 Union (recast) (<https://op.europa.eu/en/publication-detail/-/publication/990fe2a6-8f52-11ef-a130-01aa75ed71a1/language-en>).

⁽³⁾ https://anti-fraud.ec.europa.eu/document/download/d58cbc45-09f8-41cc-ba16-7b6ec0d16f02_en?filename=pif-report-2024-edes_en.pdf.

⁽⁴⁾ See https://www.eca.europa.eu/ECAPublications/SR-2025-11/SR-2025-11_EN.pdf.

⁽⁵⁾ See the reply of the https://www.eca.europa.eu/Lists/ECARepplies/COM-Replies-SR-2025-11/COM-Replies-SR-2025-11_EN.pdf,