

(English version)

**Question for written answer E-002267/26
to the Commission
Mathilde Androuët (Pfe)
(3 June 2026)**

Subject: Influence of foreign-funded think tanks on shaping the European Green Deal

According to an article published by Euractiv on 12 May 2026 ⁽¹⁾, US-based think tank Regulatory Assistance Project (RAP) ‘quietly shaped’ the European Green Deal’s ‘energy efficiency first’ principle and is now considering a merger with German think tank Agora Energiewende, an important player in European climate policy.

These structures would benefit from significant funding from mainly American foundations and philanthropic organisations.

In view of the above:

1. Can the Commission clarify the exact nature of RAP and Agora’s contributions to the development of European climate policies, in particular in relation to the ‘energy efficiency first’ principle?
2. Has the Commission verified the possible existence of direct or indirect links between these funders and foreign economic, industrial or state interests that could influence European climate policies?
3. Does the Commission consider it legitimate for structures that are largely financed from abroad to have a significant influence on strategic choices with major consequences for Member States’ industry, energy prices and economic sovereignty?

Submitted: 3.6.2026

**Answer given by Mr Jørgensen on behalf of the European Commission
(27 August 2026)**

The energy efficiency first principle is defined in Article 2(18) of Regulation 2018/1999 ⁽¹⁾, which was adopted by the co-legislators. The need to treat energy efficiency as an energy source in its own right resulted from internal reflection in the Commission and had not been inspired by any particular external actor. Already in 2015, the Commission encouraged Member States to give energy efficiency primary consideration in their policies ⁽²⁾.

Its subsequent development into legal requirements and guidance was supported by several research projects and consultancy contracts, which provided expertise and collected opinions, as part of standard procedures.

The Regulatory Assistance Project (RAP) was part of the consortia of eight projects funded by Horizon Europe, five by Horizon 2020 and six by LIFE, and one study contract, which informed the policy development ⁽³⁾.

The Commission adheres strictly to its transparency obligations by publishing information on funding recipients in the Financial Transparency System ⁽⁴⁾ and proactively disclosing the objectives and outcomes of funded projects on the Funding and Tenders Portal ⁽⁵⁾.

The Commission also uses the Transparency Register ⁽⁶⁾ as a source of information on interest representatives carrying out influencing activities at EU level.

Under the Agreement, registrants not representing commercial interests must declare their overall budget, funding sources, and any individual contribution above EUR 10 000 that represents more than 10% of their total annual budget, including the contributor’s name.

¹ ‘Europe’s most influential energy think tanks to merge’, Euractiv, 12 May 2026, Nikolaus J. Kurmayer, <https://www.euractiv.com/news/europes-most-influential-energy-think-tanks-to-merge/>.

⁽¹⁾ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, ELI: <http://data.europa.eu/eli/reg/2018/1999/oj>.

⁽²⁾ For example, in COM(2015)080 final: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52015DC0080>.

⁽³⁾ ENFIRST, ENFIRST PLUS, META BUILD; and the specific contract ENER/B2/2022-373 under the Framework Contract No ENER/2020/OP/0021.

⁽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⁾ Established by the Interinstitutional Agreement of 20 May 2021.

This includes, where relevant, funding from third-country governments. RAP is registered in this Register ⁽⁷⁾ and provides information on its interest representation activities and funding sources.

⁽⁷⁾ https://transparency-register.europa.eu/search-register-or-update/organisation-detail_en?id=210455010135-08.