

(English version)

**Question for written answer E-003136/26
to the Commission
Raquel García Hermida-Van Der Walle (Renew)
(27 July 2026)**

Subject: Israel's registration requirements imposed on NGOs and the EU adequacy decision for transfer of data to Israel

In 2025, Israel adopted Guidelines for the Registration of Organisations and Issuance of Recommendations for Their Foreign Employees, which require non-governmental organisations (NGOs) providing humanitarian aid in the Palestinian Territories to provide a significant amount of personal data to the competent authorities in Israel ⁽¹⁾.

Since 2011, Israel has benefited from an adequacy decision under the EU's data protection legal framework (currently pursuant to Article 45 of the General Data Protection Regulation ⁽²⁾ (GDPR)), which requires the Commission to 'monitor developments ... that could affect the functioning' of such adequacy decisions. NGOs subject to the GDPR need to comply with the rules and conditions set out in the GDPR.

1. Does the Commission acknowledge that these guidelines pose problems for NGOs, such as: (a) the requirement to ensure the proportionality, necessity and transparency of such processing activities; (b) the need for a valid legal basis for such processing activities, as imposed by the GDPR; and (c) the need to ensure that data subjects may exercise their rights?
2. Does the Commission consider that such data flows from NGOs to competent authorities in Israel would fall within the scope of the adequacy decision adopted for Israel? If so, does it consider that these guidelines undermine the adequacy decision?
3. If so, will the Commission suspend the adequacy decision until Israel fully complies with all the conditions set out in the adequacy decision? If not, why not?

Submitted: 27.7.2026

**Answer given by Mr McGrath on behalf of the European Commission
(30 September 2026)**

The EU has been unequivocal that the international non-governmental organisations ('INGO') registration framework cannot be implemented in its current form, as reiterated in a joint statement issued by the High Representative of the Union for Foreign Affairs and Security Policy and the Commissioners for Equality Preparedness and Crisis Management, and for the Mediterranean, on 6 January 2026 ⁽¹⁾.

The General Data Protection Regulation (GDPR) applies to the processing of personal data in the context of the activities of a controller or processor established in the EU.

Accordingly, the processing of personal data by INGOs carried out to comply with Israeli rules may be covered by the GDPR, if and to the extent it is taking place in the EU.

In this context, it is for the data protection authorities and courts of the EU Member States to assess if such processing complies with the GDPR. INGOs subject to the GDPR also need to comply with the rules and conditions for the transfer of personal data to third countries set out in Chapter V.

Transfers of personal data from the EU to private and public entities in Israel can be based on the Commission's adequacy decision for Israel of 31 January 2011.

The Commission monitors all developments that may affect the level of protection guaranteed in Israel for personal data received from the EU and has mechanisms at its disposal to respond should the level of protection no longer be deemed adequate.

¹ Including personal data of their staff, their spouses and children, and a list of their donors, including their 'background' information.

² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, 4.5.2016, p. 1, ELI: <http://data.europa.eu/eli/reg/2016/679/oj>).

⁽¹⁾ https://civil-protection-humanitarian-aid.ec.europa.eu/news-stories/news/registration-international-ngos-palestine-joint-statement-high-representative-kallas-and-2026-01-06_en.