

INITIATIVE ON TRANSPARENCY FOR EUROPEAN PARTY FUNDING

European Democracy Consulting Stiftung

Executive Summary

The transparency of political finance is a core principle of, and often a major challenge for, democratic societies. Data on the funding of political activities must not only be published online, but should also be complete, contextualised, available in a timely manner, directly accessible, and easy to scrutinise by civil society and the general public. These principles form the preconditions for accountability.

[Regulation 1141/2014 on the statute and funding of European political parties and European political foundations](#) contains the legal provisions applicable to these entities. This includes the transmission of information by European political parties and foundations to the Authority on European political parties and European political foundations (APPF) and to the European Parliament (EP), as well as the publication of specific data by these two bodies.

Unfortunately, the current transparency regime falls short of modern standards and best practices found across the European Union. As a result, information on the financing of European political parties and foundations is incomplete, hard to access, often only available long after the facts, and almost always provided as bare tables in bland PDF documents. For instance, the final amounts of European taxpayer's money received by European parties for the year 2022 will not be available before early 2025.

This report identifies specific proposals to improve transparency on the funding of European political parties and foundations. However, in order to allow for swifter changes, it stays clear of more substantive issues and focuses instead on reporting and disclosure. These are often small and technical changes to legal provisions that can bring about notable improvements in transparency, and that may be supported by all those who are committed to the transparency of political finance.

Most importantly, it was designed with the goal of improving transparency without additional burden on reporting entities. Instead, it seeks to build upon current reporting and publication requirements, and to leverage digital tools for the benefit of all citizens.

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Chapter 1 - Deadlines

#1. Ensure the timely publication of donations ahead of European elections (Art. 20 and 32.1)

Reasoning

European political parties and foundations are required to report donations made within six months of elections to the European Parliament to the APPF on a weekly basis (Article 20.3), by providing the information usually reported for donations (Article 20.2). The APPF is then required to publish the names of donors and their corresponding donations (Article 32.1.e).¹

While the APPF has worked to publish these donations on an expedited basis (usually a few working days), the Regulation itself does not impose a deadline on the APPF for the publication of this information, despite the political importance of electoral finance and the necessity of providing timely information to voters.

Proposal

We propose to amend Art. 32.1 to request that the APPF publish donations made within six months of elections to the European Parliament within a few days of their notification to the APPF. The APPF's workload can be eased in this regard with the use of online reporting tools – both for European parties and foundation to report to the APPF via an online platform, and for the APPF to easily publish this information on its website.²

→ for instance: the deadline for the publication of donations made within six months of elections to the European Parliament could be set to two working days.

While the APPF has worked to publish these donations on an expedited basis, the Regulation itself does not impose a deadline on the APPF for the publication of this information.

#2. Ensure the timely publication of high-value donations (Art. 20 and 32.1)

Reasoning

European political parties and foundations are required to immediately report accepted single donations above €12,000 to the APPF (Article 20.4), by providing the information usually reported for donations (Article 20.2). The APPF is then required to publish the names of donors and their corresponding donations (Article 32.1.e).

While the APPF has worked to publish these donations on an expedited basis, the Regulation itself does not impose a deadline on the APPF for the publication of this information, despite the political importance of high-value donations.

¹ For more details on the modalities of the reporting of donations, see proposal #11.

² For more details on reporting and disclosure systems, see proposal #23.

Proposal

We propose to amend Art. 32.1 to request that the APPF publish single donations above the agreed threshold within a few days of their notification to the APPF. As for the previous recommendation, the APPF's workload can be eased in this regard with the use of online reporting tools – both for European parties and foundation to report to the APPF via an online platform, and for the APPF to easily publish this information on its website.³

→ for instance: the deadline for the publication of single donations above the agreed threshold could be set to two working days.

#3. Provide a deadline for the publication of documents by the APPF and the European Parliament (Art. 32.1 and 32.2).

Reasoning

Transparency provisions in Regulation 1141/2014 require the APPF and the European Parliament to publish information regarding European political parties and foundations, including their public funding, the donations and contributions they receive, or their list of member parties or organisations.

However, while deadlines often exist for the provision of this information to the APPF and Parliament, no deadlines exist for the publication of this information by the APPF and Parliament.

For the financial year 2019, for instance, information on donations was provided by European parties and foundations by the end of June 2020 at the latest. Yet, it was not until late February 2021, another eight months later, that a consolidated list of donations and contributions was published by the APPF. For the financial year 2018, this publication took close to a year. This means that donations made early in the financial year are not available to the public for over two years.

Here is a list of the information requested for publication from the APPF or European Parliament, along with their applicable deadline (Articles 32.1 and 32.2):

Item	Current deadline
Registration documents (32.1.a)	Four weeks after the APPF has adopted its decision
Applications not approved (32.1.b)	Four weeks after the APPF has adopted its decision
Annual amounts of public funding paid out (32.1.c)	
Annual financial statements and external audit reports, and final reports on work programmes or actions (32.1.d)	
Information on donations (32.1.e)	
Information on contributions (32.1.f)	
Sanctions and their justification (32.1.g/h)	

This means that donations made early in the financial year are not available to the public for over two years.

Item	Current deadline
Technical support provided to parties	
Evaluation by the EP of the implementation of Regulation 1141/2014 (32.1.i)	
List of MEPs members of European parties (32.1.j)	
Legal persons members of European parties (32.2)	Unclear (refers to Art. 9.6, which does not refer to obligations on the APPF or EP) ⁴
Total number of individual members	

Proposal

We propose to amend Art.32 to include specific and reasonable deadlines for all documents to be published by the APPF or the European Parliament. A disclaimer may be added, where relevant, to indicate that information is under review, as the APPF already does for its expedited publication of donations ahead of elections to the European Parliament or single donations above €12,000.

→ for instance: the deadlines could be as follows:

Item	Proposed deadline
Annual amounts of public funding paid out (32.1.c)	As soon as amounts are determined
Annual financial statements and external audit reports, and final reports on work programmes or actions (32.1.d)	1 week after yearly submission
Information on donations (32.1.e)	1 week after quarterly reporting ⁵
Information on contributions (32.1.f)	1 week after quarterly reporting
Sanctions and their justification (32.1.g/h)	1 week after adoption
Technical support provided to parties	1 month after end of financial year
Evaluation by the EP of the implementation of Regulation 1141/2014 (32.1.i)	1 week following report adoption
List of MEPs members of European parties (32.1.j)	1 week after receiving data from a party
Legal persons members of European parties (32.2)	1 week after notification of change
Total number of individual members	1 week after receiving data from a party

#4. Publish the financial documents following their submission to the APPF (Art. 23.1 and 32.1)

Reasoning

European parties and foundations are required to submit their financial documents within six months of the end of the financial year (by 30 June of year N+1).

⁴ Article 32.2 states that the EP shall make public the list “updated in accordance with Article 9(6)”. Article 9.6 merely states that an updated list “shall be sent to the Authority each year” and, in case of changes affecting the registration of the party “within four weeks of any such change”.

⁵ For more on the reporting of donations, see proposal #6.

At the time of writing, the most recent audit documents and financial statements cover the financial 2022 and were uploaded in March 2024, or 15 months following the end of the financial year.

However, these documents are not made available to the general public until much later. For instance, at the time of writing, the most recent audit documents and financial statements cover the financial 2022 and were uploaded in March 2024, or 15 months following the end of the financial year. This delay is particularly detrimental to transparency.

Meanwhile, and despite the absence of clear legal provisions to this effect, the APPF has regularly published donations in an expedited manner before proceeding to their verification, labeling them as “subject to further scrutiny by the Authority”. This allows for increased transparency, as information is made available in a timely manner, while making it clear to citizens that information may be amended following review.

Proposal

We propose to amend Art. 32 to request that audit documents and financial statements be published upon their reception by the APPF. As is already common practice, these documents can be labeled as “subject to further scrutiny”.

#5. Provide a deadline for the publication of the annual report of the Director of the APPF (Art 6.10)

Reasoning

Every year, the Director of the APPF is required to submit a report to the European Parliament, the Council and the Commission on the activities of the Authority (Art. 6.10). However, no deadline is provided in Regulation 1141/2014 for the submission of this report or its publication.

While the timely publication of recent reports has improved, previous activity reports took close to a year before being made available.

Proposal

We propose to amend Art. 6.10 to request that this report be submitted by a fixed deadline following the end of the calendar year, and be made available on the APPF’s website alongside its communication to the recipient institutions.

→ *for instance: the deadline for the submission and publication of the annual report could be two months following the end of the financial year.*

#6. Scatter the deadlines for the publication of financial documents by European parties and foundations, and shorten the deadline for the reporting of donations and contributions (Art. 23.1 and 32.1)

Reasoning

Following the end of the financial year (31 December), European parties and foundations have six months to provide their annual financial statements, an external audit report on the annual financial statements, and the list of donors

and contributors and their corresponding donations or contributions (Art. 23.1).

However, establishing and auditing financial statements takes time, while donations and contributions are usually recorded on a rolling basis as they are received. Therefore, bundling the list of donations and contributions with financial statements and audits only adds an unnecessary delay to the release of data on donations and contributions.

In addition to providing this information in a more timely manner, scattering deadlines means that the APPF can start processing data on donations and contributions earlier in the year, instead of receiving all financial data at once.

Across the EU, national parties – usually receiving far more donations than European parties and foundations⁶ – are requested to provide data on donations within 30 to 90 days of the end of the financial year.

Additionally, reporting can be requested on a quarterly basis, as is the case in several Member States. Staggering reporting during the year would further lighten the load on the APPF in quickly processing donations and contributions.

Proposal

We propose amend Art. 23.1 to create separate deadlines for the provision of financial documents, and to shorten the deadline for the provision of data on donations and contributions.

→ for instance: the deadline for the provision of data on donations and contributions could be shortened from the current “six months following the end of the financial year” to “one month following the end of each quarter”.

#7. Shorten the deadline for the reporting of financial statements and their audit (Art. 23.1)

Reasoning

Financial statements are key documents for financial transparency and their timely submission is essential for proper transparency. As indicated above, the current deadline for the reporting of annual financial statements and their external audit report⁷ is six months following the end of the financial year (Art. 23.1).

Across the EU, national parties are often requested to provide their financial documents within two to four months following the end of the financial year.

Proposal

We propose to amend Art.23.1 to shorten the deadline for the provision of annual financial statements and their audit.

→ for instance: the deadline for the provision of annual financial statements could be

⁶ For more on the donations received by European and national parties, see the [European Party Funding Observatory](#) and national platforms.

⁷ Decision 2019/C 249/02 of the Bureau of the European Parliament indicates that “the European Parliament shall receive directly from the independent external bodies or experts [...] the external audit report specified in Article 23(1) point (b)” (Article 7.1).

Bundling the list of donations and contributions with financial statements and audits only adds an unnecessary delay to the release of data on donations and contributions.

shortened from the current six months to three months, and audits could be provided one to two months later.

#8. Require the transmission of the list of European parties' national member parties following each change, instead of once a year (Art. 9.6)

Reasoning

European political parties are required to provide an updated list of member parties each year; changes after which a European party would no longer meet its registration requirements must be reported within four weeks (Art. 9.6).

This specific point is less comparable to the national context, where national political parties are usually not organised as “parties of parties”, so best practices are limited. However, updates to national parties' statutes are required to be reported on a regular and timely basis.

Proposal

We propose to amend Art. 9.6 to request that changes in European parties' national party membership be notified to the APPF within a fixed timeframe following each change, regardless of whether this membership change impacts a party's ability to meet registration requirements.

The submission and publication of relevant official documents (such as mentions in a national official journal) may occur at a later date.

→ for instance: the deadline for the notification of changes to the list of member national parties could be set to two weeks, and the submission of official documents could take place within one to two weeks of their official publication.

#9. Provide a deadline for the transmission of amendments of statutes to the APPF (Art. 9.5)

Reasoning

European political parties and foundations are required to provide any amendments to the documents or statutes submitted as part of the application for registration (Art. 9.5). However, Regulation 1141/2014 does not provide a deadline for this submission.

Proposal

We propose to amend Art. 9.5 to request that changes made to the documents or statutes submitted as part of the registration process be notified within a fixed timeframe following their adoption.

→ for instance: the deadline for the notification of changes to the statutes or other relevant documents could be set to two weeks.

Chapter 2 - Donations, contributions

#10. Ensure that contributions by individual members are properly reported to the APPF (Art. 20.2 and 32.1)

Reasoning

With regards to the reporting of donations and contributions, Regulation 1141/2014 requires European parties and foundations to “transmit a list of all donors with their corresponding donations, indicating both the nature and the value of the individual donations” (Art. 20.2). This “also [applies] to contributions made by *member parties* of European political parties and *member organisations* of European political foundations” (emphasis added).

This phrasing creates a loophole, whereby contributions made by *individual members* are de facto excluded from this reporting obligation.

Likewise, Regulation 1141/2014 requires the publication by the APPF of donations “reported by European political parties and European political foundations in accordance with Article 20(2), including the identity of the member parties or organisations which made those contributions.” (Art. 32.1.f).

On the one hand, the exclusion of individual members from the last part of the above sentence can be seen as an understandable attempt to protect individual members’ privacy, by not revealing their identity. On the other, the reference to Art. 20.2, which removes contributions from individual members from European parties’ reporting obligation, seems to confirm the existence of a loophole.

In practice, donations from individual members have appeared in APPF documents for the financial years 2020, 2021, and 2022 (which is, at the time of writing, the most recent year for which full information is published). However, in the absence of a dedicated line for each entity, it is unclear whether no contributions from individual members were received by European parties and foundations, or whether this information was simply not reported and/or published.

Proposal

We propose to rephrase the relevant sentence of Art. 20.2 as follows: “This paragraph shall also apply to all contributions made by members of European political parties and European political foundations.”

Likewise, we propose to add the following to Art. 32.1.f: “The modalities for the reporting of donations from natural persons of paragraph (e) shall apply *mutatis mutandis* to contributions above the value of membership fees. The total amount of membership fees and the number of contributing members shall also be published.”

As a result, individuals only contributing their membership fee will see their privacy respected, as only the sum total of membership fees and the number of fees-paying members will be published. Contributions by individual members on

The current phrasing creates a loophole, whereby contributions made by *individual members* are de facto excluded from this reporting obligation.

top of membership fees will then be reported in the same manner as donations – grouped as “minor contributions” under a given amount, and published with the contributor’s identity above this amount.

#11. Remove the €1,500-3,000 donation category for which written consent is required for the reporting of information by European parties and foundation and its publication by the APPF (Art. 20.2 and 32.1)

Reasoning

Regulation 1141/2024 distinguishes three cases for the reporting of donations made by individual (Art. 20.2 and 32.1.e):

- If the annual sum of donations by an individual is above €3,000, their name and the value of their donations is published;
- If the annual sum of donations by an individual is below €1,500, their name is not disclosed and their donations are grouped with other low-value donations as “minor donations”; and
- If the annual sum of donations by an individual is above €1,500 and up to €3,000, the name and value of the donations are only published with the written consent of the donor, otherwise their name is not disclosed and amounts are reported as minor donations.

Since it is unlikely that no individual donor has ever made an annual donation between €1,500 and €3,000, it would seem like no donor has ever given their consent. As a result, the effective threshold for information to be published on individual donors is indeed €3,000.

In practice, no information has ever been reported for annual donations between €1,500 and €3,000.⁸ Since it is highly unlikely that no individual donor has ever made an annual donation ranging from €1,500 to €3,000, it would seem like no donor has ever given their consent.

As a result, the *effective* threshold for information to be published on individual donors is indeed €3,000.

Proposal

For purposes of clarity and simplicity, we propose amend Art. 20.2 and 32.1 to remove the €1,500-€3,000 bracket, in order to simply publish the identity of a donor and the value of their donations above a given value, and an aggregate amount of donations below this value.

#12. Publish individual donations instead of annual amounts (Art. 20.2 and 32.1)

Reasoning

Regulation 1141/2014 is ambiguous in its phrasing relating to donations. Art. 20.1 states that European parties and foundations “may accept donations from natural or legal persons of up to a value of EUR 18 000 per year and per donor.” Art.

⁸ Wolfs, Wouter and European Democracy Consulting Stiftung. *European Party Funding Observatory Dataset*, 2024

20.2 then requests parties and foundations to “transmit a list of all donors with their corresponding donations, indicating both the nature and the value of the *individual donations*” (emphasis added).

However, Art 20.2 later talks about donations “the value of which exceeds EUR 1 500 and is below or equal to EUR 3 000” with a reference to Art. 32.1. Paragraph (e) of this article mentions “donations from natural persons the value of which does not exceed EUR 1 500 per year and per donor”.

It is therefore unclear whether the mention of “individual donations” in Art. 20.2 refers to “single donations” (used as such in Art. 20.4) or to “annual donations per donor” (by contrast with “annual donations from all donors combined”).

Proposal

Bearing in mind the distinction between minor donations (for which the annual value is below a given threshold) and *identified* donations (donations where the donor’s identity is provided), we propose to amend Art. 20.2 and 32.1 to explicitly request the reporting and publication of all single donations (not aggregated per year) for which the annual value is above the agreed threshold, including the date on which those separate donations were made.

#13. Lower the thresholds for the reporting and publication of information on individual donors and contributors (Art. 20.2 and 32.1)

Reasoning

Following up on the previous recommendation, the threshold of annual donations at which detailed information is made public on individual donors and contributors should be lowered to €500, instead of the current €3,000.

As mentioned in proposal #11, Regulation 1141/2014 sets at €1,500 the threshold after which the identify of donors may be revealed (Art. 32.1). However, since written is consent is requested (Art. 20.2) but, in practice, never granted, the *effective* threshold stands at €3,000.

This is six times the threshold set by [Regulation 2004/2003](#) – the Regulation replaced by Regulation 1141/2014 – which, between 2004 and 2015, stood at €500.

While donations above €3,000 account for the vast majority of European parties and foundations’ total *amount* of donations, they only account for a small fraction of their *number* of donations. For instance, between 2018 and 2021, European political parties received 73 donations above €3,000; over the same period, they received close to 2,400 donations below this threshold.⁹

At the national level, Member States have widely differing regulations on the reporting and publication of donors’ identity. In practice, many have a publication threshold between €100 and a few hundred euros, while several member states publicise all donations.

The threshold for the publication of a donor’s identity is six times the threshold set by Regulation 2004/2003, which, between 2004 and 2015, stood at €500.

⁹ European Democracy Consulting, *Visualising donations and contributions 2023*, <https://eudemocracy.eu/visualising-donations-and-contributions-2023>

Proposal

We propose to amend Art. 20.2 and 32.1 to lower the threshold for the reporting of single donations, including the identity of the donor, as well as the threshold for the publication of a donor's identity.

→ *for instance: all single donations could be reported together with the identity of the donor, and this identity could be published for donation of €500 and above per year per donor.*

#14. Lower the threshold for the immediate reporting of donations (Art. 20.4 and 32.1)

Reasoning

Regulation 1141/2014 requires that single donations exceeding €12,000 to European parties and foundations be immediately reported to the APPF (Art. 20.4). While the Regulation does not contain an explicit deadline for publication, the APPF strives to publish these donations on an expedited basis, usually within a week of their reporting.

As mentioned in proposal #2, this contrasts with “regular” donations, which are currently reported to the APPF alongside financial documents within six months of the end of the financial year. These contributions are then published on the APPF's website between 3 and 6 months following this deadline.

Expedited reporting therefore makes a dramatic difference in the transparency of donations: while donations exceeding €12,000 will be published within one to two weeks of the donation date, donations under €12,000 may not be publicly available until close to two years later — as donations made in January of financial year N are often not published before the end of year N+1.¹⁰

Proposal

Separately from our proposal for the quarterly reporting and publication of donations and contributions, we propose to amend Art. 20.4 and 32.1 to lower the threshold for the immediate reporting of donations.

→ *for instance: the threshold for the immediate reporting of donations could decrease from €12,000 down to €6,000.*

#15. Increase the data reported and published on donations and contributions (Art. 20 and 32.1)

Reasoning

Regulation 1141/2014 currently requires European parties and foundations to report “a list of all donors with their corresponding donations, indicating both the nature and the value of the individual donations.” For donations between €1,500 and €3,000, European parties and foundations must also indicate whether the

Expedited reporting makes a dramatic difference: while donations exceeding €12,000 will be published within one to two weeks of the donation date, donations under €12,000 may not be publicly available until close to two years later.

¹⁰ While Regulation 1141/2014 refers to “single donations the value of which exceeds EUR 12 000”, the APPF has in the past also reported donations of precisely €12,000.

donor has consented to the publication of their donation and identity.

The APPF then publishes “the names of donors and their corresponding donations”, except for low-value donations for which only the aggregate value and the number of donors is published (Art. 32.1.e).

The [recast of Regulation 1141/2014](#), proposed by the European Commission in 2021, introduced due diligence measures to be conducted by European parties and foundations for donations above €3,000, which must be shared with the APPF upon request.¹¹ However, it not mention the publication of this additional information.

The amount of information to be published by the APPF is therefore very limited. In particular, the date on which donations are made is a useful indicator to correlate private donations, in particular large donations from private companies and lobbies, with the discussion of legislative documents. Additionally, without this information, the expedited reporting carried out ahead of European elections is later merged with regular donations, and observers lose the ability to tell whether donations were made before or after the elections.¹²

Proposal

In order to improve transparency, the APPF should receive and report more information than the mere value of donations and identity of the donor. We therefore propose to amend Art. 20 to request that, in addition to currently reporting information, European parties and foundations report the list of single donations they have received, the date on which the donations were received, and, for donations above an agreed threshold, the result of due diligence verifications proposed in the Commission's recast – since European parties would be required to perform those verifications, their result ought to be automatically shared with the APPF, avoiding needless work and requests from the APPF. In line with proposal #13, this would apply to all donations.

Similarly, we propose to amend Art. 32.1 to request that the APPF publish the list of single donations received by European parties and foundations and, for each, the date on which the donation was received, the type of donation (financial, in kind, etc.), the identity of the donor, the category of the donor (individual, politician, political party, NGO, think tank, private company, etc.), the registration number of legal persons, the Member State of the donor, and, for donations above an agreed threshold, the result of due diligence verifications. Minor donations should be broken down by Member State.¹³

The amount of information to be published by the APPF is very limited.

11 The Commission's recast proposal reads: “For all donations the value of which exceeds EUR 3000, European political parties and European political foundations shall request donors to provide the necessary information for their proper identification. European political parties and European political foundations shall transmit the information received to the Authority upon its request.”

12 At the time of writing, the [list of donations published by the APPF](#) for 2024 does not make a distinction between donations recorded as part of the pre-electoral expedited reporting and donations made later in the year. For a record of donations made in the six months prior to the 2024 European elections, see European Democracy Consulting's [Donations tracker](#).

13 For a discussion on donations' minor maximum value, see proposal #13.

Chapter 3 - Additional publications

#16. Publish a permanent record of European parties' member MEPs and member parties (Art. 32.1 and 32.2)

Reasoning

Regulation 1141/2014 requires the European Parliament to publish “an updated list of MEPs who are members of a European political party” (Art. 32.1.k). Likewise, the EP is required to publish “the list of legal persons who are members of a European political party” (Art. 32.2) – national member parties.

However, these documents, published on a yearly basis, have often replaced information provided for previous years, making it difficult to track the evolution of European parties' membership. Currently, the APPF's website provides, in average, only two files for legal persons (2023 and 2024), and three files for MEPs (2022, 2023 and 2024). The APPF was set up in 2016 and Regulation 1141/2014 applied as of 1 January 2017 (Art. 41).

Proposal

Instead of separate party lists of member MEPs, we propose to amend Art. 32 to request that the APPF publish a consolidated table of all MEPs together with their membership of a European political party (or lack thereof), including membership dates and, where relevant, past membership information. In line with proposal #21, citizens should be able to browse through previous years to see the evolution of European party membership. A similar table should be provided for legal persons members of a European party or foundation.

#17. Publish European parties' and foundations' applications for funding (Art. 32.1)

Reasoning

Every year, European parties and foundations apply for European public funding. Since these applications are official requests for European taxpayers' money by European parties and foundations, their content is of public interest.

In particular, applications for European public funding include “evidence demonstrating that [parties'] EU member parties have, as a rule, published on their websites, in a clearly visible and user-friendly manner, the political programme and logo of the European political party” for the year prior to the application, as well as European parties' draft budget. This last document, submitted by 30 September of the year N-1 (with N being the relevant financial year), is otherwise only made available to the public alongside European parties' and foundations' financial documents, published around the end of year N+1, or over two years later.

These documents, published on a yearly basis, have often replaced information provided for previous years, making it difficult to track the evolution of European parties' membership.

European parties' and foundations' applications for funding are official requests for European taxpayers' money and their content is of public interest.

Proposal

We propose to amend Art. 32.1 to request that European parties' and foundations' applications for European public funding be published on the website of the APPF within a fixed timeframe following their submission, after due redaction of any personal data therein.

→ *for instance: European parties' and foundations' applications for European public funding could be published on the website of the APPF within one week of their submission.*

#18. Publish European parties' and foundations' public funding entitlement and their detailed calculation (Art. 19.1 and 32.1)

Reasoning

Following European parties' and foundations' application for European party funding, the European Parliament decides on how much taxpayers' money these entities are entitled to, depending on the overall amount of European funding allocated for party funding in the EP's budget, parties' number of member MEPs, their planned reimbursable expenses, and the amounts they actually applied for (Art. 19.1).

However, these entitlement amounts are only published by the European Parliament in a PDF document on a page of its sub-website dedicated to "contracts and grants" several months later.

The underlying calculations are published neither by the APPF, nor by the European Parliament, and are only found as an annex of the note of Secretary-General of the European Parliament presented to the Bureau, and which citizens must request via the EP's *access to documents* procedure. The European Parliament has systematically delayed the publication of these documents.¹⁴

Proposal

We propose to amend Art. 32.1 to request that the APPF publish on its website European parties' and foundation's entitlements to European public funding, including their detailed calculations, following their adoption by the Bureau of the European Parliament. In line with the APPF's current practice for donations, a notice could remind citizens that amounts may vary.

The underlying calculations for entitlements of public funding are published neither by the APPF, nor by the European Parliament; citizens must request them via the EP's *access to documents* procedure.

¹⁴ In response to requests for public access to documents placed by the European Democracy Consulting Stiftung, the European Parliament has argued that the note could not be publicised until European parties and foundations had been notified and given the opportunity to submit observations and appeal the conclusions of the Bureau. However, it has not indicated why the publication of such documents would constitute an impediment to such steps by European parties or foundations.

Chapter 4 - Publication modalities

#19. Gather all data on a single website (Art. 32.1)

Reasoning

Regulation 1141/2014 stipulates that “the European Parliament shall make [specific information] public, under the authority of its Authorising Officer or under that of the Authority, on a website created for that purpose” (Art. 32.1).

In practice, however, the European Parliament and the APPF separately publish information they consider to be responsible for. On its own website, the APPF publishes information listed under Art. 32.1 relating to the registration and de-registration of European parties or foundations, donations and contributions, sanctions, the Committee of Independent Eminent Persons, and its own activity reports. Additionally, it publishes its draft budgets, general and funding-related guidance, as well as studies. The website now also includes a link to the website of the European Parliament for documents published there.

For its part, the European Parliament publishes, on a sub-website dedicated to “contracts and grants”, information on the funding procedure, the amounts of public funding and the technical support received by European parties and foundations, the number of individual members per European party, and the audit files of European parties and foundations.

In a January 2021 decision, the European Ombudsman called on the APPF to “make available as much information about [European parties] as possible”. However, the APPF has consistently chosen to only publish the minimum amount of information strictly required under Regulation 1141/2014 – and sometimes even less, as evidenced by the long-running lack of a consolidated list of MEPs with their party affiliation.

The APPF has argued that its website was not “created for the purpose of publishing documents possessed by the European Parliament” and therefore refused to publish documents “that are in the remit of the European Parliament”, arguing this would not be in the public interest.¹⁵

This practice has nullified the legislator’s intent to see all information under Article 32.1 made available to citizens on a single website, despite no other website being available for such purpose.

Proposal

We propose to amend Art.32.1 to clearly designate the website of the APPF as *the* website referred to in this article, so as to ensure that all information mandated by law to be made available can be finally found on a single website, as per the legislator’s intent. The APPF should be explicitly entrusted with the publication

This practice has nullified the legislator’s intent to see all information under Article 32.1 made available to citizens on a single website.

¹⁵ [Reply from the Authority for European Political Parties and European Political Foundations](#) (APPF) to the European Ombudsman’s inquiry into the APPF’s alleged failure to comply with transparency obligations, Case [1094/2020/DI](#), 4 October 2020

of this data, part of which should be procured from the European Parliament in line with these institutions' obligation to cooperate (Art. 28.1 and 28.2).

#20. Provide data in open data format (Art. 32)

Reasoning

While Regulation 1141/2014 does require a certain amount of information to be made public, the precise modalities of this publication are not provided. The Regulation sometimes refers to specific data points (names, donations, contributions, decisions, etc.), sometimes to documents (annual reports, evaluation reports, annual financial statements, and external audit reports), and sometimes to less defined elements (lists, descriptions, details, etc.).

In the absence of more precise requirements of guidance, the APPF and European Parliament have mostly published documents in PDF format, whether for the re-publication of documents provided to them (registration documents, audit reports, etc.) or for documents they issued themselves (list of members, list of donations and contributions, number of individual members, etc.).

In limited case, such as for donations and contributions, the APPF has recently worked to publish information in machine-readable format. However, this does not even cover all the data provided by the APPF (as data for 2018 and 2019 remains in PDF only), and the documents themselves are not properly designed for data exploitation, making their use difficult. This practice has dramatically and needlessly complicated transparency efforts and the analysis of data on European political parties and foundations, in particular of their funding.

Proposal

In line with the [EU Directive on open data and the re-use of public sector information](#), we propose to amend Art. 32 to request that the APPF and European Parliament publish their information in open, machine-readable format — for instance, as [CSV](#) files.¹⁶

Additionally, the use of databases from which data could be extracted in machine-readable format (and for which relevant sources could still be provided in PDF format, as necessary) would both support transparency and simplify the work of these institutions.

#21. Publish past information (Art. 32)

Reasoning

In line with its argument that it should not publish documents that are not “part of its remit”, the APPF has not only declined to publish all relevant financial information for the years in which it has been active, but it has also refrained from publishing past information, arguing that it “would be in no position to ensure that the information contained in those documents is correct and up to date.”

This includes audit reports provided by European political parties, which are not

The practice of publishing information in PDF format has dramatically and needlessly complicated transparency efforts and the analysis of data on European political parties and foundations.

susceptible to later updates, and information on donations and contributions prior to 2018, which is available in official documents of the European Parliament or was reported by European parties (Art. 6 of Regulation 2004/2003).

This is despite an explicit obligation of cooperation requiring that “the Authority [and] the Authorising Officer of the European Parliament [share] information and keep each other regularly informed of matters related to funding provisions, controls and sanctions” and “agree on practical arrangements for such exchange of information” (Art. 28.1 and 28.2).

Proposal

We propose amend Art. 32 to request that the APPF publish all available official information on the funding of European political parties and foundation since the entry into force of Regulation 2004/2003, predecessor of Regulation 1141/2014, in particular information on the public funding of European parties and foundations, their donations and contributions, and their spending.

#22. Provide charts, tables, maps, infographics (Art.32)

Reasoning

In line with their practice of limited publications, the APPF and European Parliament publish requested figures, mostly in PDF files, but do not accompany this data with more interactive tools, such as charts, tables or infographics, the way the European Parliament does for election results, for instance.¹⁷

Since the publication of information by the APPF and European Parliament mandated in Art. 32 aims explicitly at *transparency*, this goal could be more fully reached by the provision of charts showing data per year or per party, and the evolution of data over time.

Likewise, the APPF could publish interactive tables of donations and contributions received by European parties and foundations, as well as a searchable directory of legal persons and MEPs members of European parties.

Proposal

We propose to amend Art. 32 to request that the APPF and the European Parliament accompany their data publication with relevant charts, tables, maps, and infographics for the proper transparency of financial and other data.

#23. Design a digital reporting and disclosure tool to receive, process, and publish data from European political parties and foundations (Art. 32)

Reasoning

Currently, European parties and foundations submit the documents required of them, including lists of donations and contributions, and other financial information, by email — albeit now using a new and more secure uploading system.

The APPF has not only declined to publish all relevant financial information for the years in which it has been active, but it has also refrained from publishing past financial information.

¹⁷ European Parliament, 2024 European election results, <https://results.elections.europa.eu/>

Well designed in conjunction with all interested parties, an online reporting and disclosure system can dramatically simplify data reporting, review, and disclosure.

This requires staff from the APPF and the EP to manually input this information into their data system for processing, and does not contribute to the publication of this data, which must be handled separately. This results in extended delays, a duplication of work, and a higher risk of human error.

Conversely, the use of online reporting and disclosure systems allows relevant stakeholders to submit data at any point and removes the need for APPF or EP staff to re-enter this information. Review can be partially automated and streamlined, and imported data can directly feed into a public disclosure portal, ensuring that information is provided to citizens in a timely manner.

Well designed in conjunction with all interested parties, an online reporting and disclosure system can dramatically simplify data reporting, review, and disclosure. It simplifies administrative processes and increases transparency.

The adoption of a digital system would also directly simplify the implementation of many of the proposals of this initiative, including at least proposals #1, #2, #3, #4, #8, #12, #15, #16, #17, #19, #20, and #22.

Proposal

We propose to amend Art. 32 to entrust the APPF with the development of an online reporting and disclosure system for all data and information to be submitted by European political parties and foundations. This exception task should be matched with additional human and financial resources allocated to the APPF for the development of this tool.

The [practical guide](#) devised by International IDEA, as well as the [detailed review](#) it compiled for Albania, constitute extremely informative guides for reporting and disclosure systems.

#24. Give the APPF a mandate of public information (Art. 6)

Reasoning

Beyond the information that must already be made public under Regulation 1141/2014, European citizens' knowledge of their common parties should be actively promoted, albeit in a non-partisan manner. Given the historical weight of national parties, this mission is particularly important in order for European political parties to fulfil their treaty-mandate role.¹⁸

In line with the proposals above, the APPF should therefore publish contextual and historical information, including using infographics and visualisations, ranging from the history and role of European parties and foundations, to the results of European elections from the perspective of European parties. This could also include pre-election awareness-raising efforts to bolster European citizens' interest in their common parties.

Proposal

We propose to amend Art. 6 to give the APPF an explicit mandate to inform citizens about their common parties and foundations. This should be matched with the necessary increase in financial and human resources for the APPF.

¹⁸ "Political parties at European level contribute to forming European political awareness and to expressing the will of citizens of the Union", Treaty on European Union, Article 10.4

#25. Produce reliable and periodic data on European parties

Reasoning

Given the limited awareness of European citizens for their European parties, an essential aspect of increasing transparency is to monitor progress made regarding citizens' "awareness and recall" of European parties and of their funding. Only with reliable and periodic data can we properly understand the impact of the measures taken, and decide on further measures as may be necessary.

As part of its proposed mandate of public information, the APPF should reach out to European citizens to assess their knowledge and recall of European parties and of their funding. This can be done directly, should the APPF be provided with the necessary resources, or indirectly via the Eurobarometer surveys and by contracting sampling services.

In particular, Eurobarometers, which are published by the European Parliament, the European Commission, and other EU institutions, have regularly been used to assess European citizens' perception of European institutions — such as of the European Parliament in its [Spring 2023](#) issue¹⁹ or in the [Parlemeter 2020](#)²⁰ — or of European democracy — such as in the Parliament's [Post-electoral survey 2024](#)²¹ or the Commission's [Standard Eurobarometers](#).

Proposal

We propose to amend Art. 6 to mandate the APPF to periodically procure and publish data on European citizens' knowledge and recall of European political parties.

In particular, in line with Art. 6.6, the APPF should conclude an agreement with the European Parliament, and, if appropriate, with the European Commission, to enable it to carry out this task.

Only with reliable and periodic data can we properly understand the impact of the measures taken, and decide on further measures as may be necessary.

19 European Parliament, *Eurobarometer: Democracy in action, One year before the European elections*, Spring 2003, EB 99.1, PE 734.015

20 European Parliament, *Eurobarometer: A Glimpse of certainty in uncertain times*, Parlemeter 2020, EB 94.2, PE 689.219

21 European Parliament, *Eurobarometer: EU Post-electoral survey 2024*, Special Eurobarometer 101.5

About the European Democracy Consulting Stiftung

The European Democracy Consulting Stiftung is a non-profit foundation advancing the study of European institutions and democracy.

Our history

In July 2023, European Democracy Consulting, a Vienna-based consulting firm focusing on the reform of European institutions, set up the **European Democracy Consulting Stiftung** as a non-profit foundation, to manage its pro bono projects and separate them from consulting activities.

The purpose of the foundation is to advance the science and research related to European institutions and democracy.

Our vision

Democracy does not always come easy; there may be vested interests opposing its development. As a result, sixty years after its creation, the European Union still falls far short of the democratic standards of developed countries.

We support a value-based discussion and propose concrete political and legal solutions, based on best-practices, that will strengthen our common democracy for the general interest of all Europeans.

Our work

The European Democracy Consulting Stiftung is independent of specific national, political, or corporate interests. Our work represents our best efforts at providing accurate data, relevant best practices, and actionable recommendations based on our research and in line with our support for European democracy.

The foundation's flagship project is the European Party Funding Observatory (EPFO), a unique online platform providing transparency on the funding, both public and private, of European political parties. Discover the EPFO at <https://epfo.eu>.

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