

# ***PATRIOTS***

**FOR EUROPE FOUNDATION**

## **NGOS AND LOBBYING**

**Research publication on NGO influence  
and transparency in EU policymaking**

*This study has received financial support from the European Parliament.  
The authors bear sole responsibility for the content.*



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## INTRODUCTION

Non-Governmental Organizations (NGOs) have emerged as significant actors within the policy-making arena of the European Union (EU). In the context of increasingly complex governance arrangements, NGOs function as intermediaries between civil society and EU institutions, advocating diverse interests. Their roles encompass lobbying, providing expert knowledge, mobilizing public opinion, and participating in formal consultation and advisory processes. This multifaceted engagement of NGOs enhances democratic legitimacy and pluralism in EU policymaking, promoting social and environmental sustainability.

In contemporary European governance, NGOs have emerged as pivotal actors shaping the policy landscape of the EU. Over the past three decades, the EU has undergone a profound transformation from an economic community into a complex multilevel political system, characterized by a dense network of institutions, agencies, and policy actors. Within this system, NGOs have acquired an increasingly prominent role in lobbying, advocacy, and policy consultation, often serving as intermediaries between supranational institutions and the broader public. Their participation in EU policymaking is frequently justified on democratic and functional grounds: NGOs are perceived as representatives of civil society interests, contributors of specialized knowledge, and agents enhancing transparency and accountability within the EU's complex decision-making structures.

However, the growing influence of NGOs in EU lobbying activities is accompanied by critical perspectives. The concept of "elite capture" highlights the dominance of well-resourced, Brussels-based NGOs that may prioritize their organizational interests and maintain privileged access to decision-makers, potentially marginalizing smaller or grassroots organizations and limiting the diversity of voices. Additionally, questions about transparency, impartiality, and funding dependencies complicate the evaluation of NGOs' impact. These dynamics necessitate a thorough understanding of the roles, mechanisms, advantages, and challenges associated with NGO lobbying in the EU.

On 17 June 2025, a provisional agreement was concluded between the European Parliament and the Council on a regulatory framework designed to enhance transparency and democratic integrity for European political parties and foundations. While this reform package represents a significant step towards modernising the EU's political architecture, it coincides with a period of escalating political pressure on civil society organisations. This climate has been notably intensified by the European Parliament's concurrent initiative to establish a new oversight body tasked with investigating EU-funded non-governmental organisations (NGOs).

These parallel developments such as the imposition of stricter standards for political parties and the intensification of scrutiny on civil society constitute a pivotal juncture for European democratic governance. They reflect a substantive rebalancing of the EU's democratic infrastructure. On one hand, the regulatory reforms

for political parties aim to fortify institutional transparency and accountability. On the other hand, the heightened oversight of civil society introduces a risk of fostering a climate of institutional suspicion, potentially constraining its capacity to freely articulate its perspectives to EU institutions.

For civil society organisations (CSOs), the operational environment is becoming increasingly precarious. The establishment of an investigatory body with ambiguously defined terms of reference institutionalises a presumption of suspicion that is vulnerable to political instrumentalisation. Whereas political parties are subject to a coherent regulatory framework unified by the principle of transparency, civil society is confronted with a qualitatively different form of attention. Illustratively, merely two days following the inter-institutional agreement on party reforms, the European Parliament approved the creation of a **new body to examine the funding of NGOs in receipt of EU support**. This decision culminates a protracted campaign, championed predominantly by political forces advocating for a restrictive stance on NGO funding and segments of the European People's Party (EPP), which have **publicly contested the influence and financial accountability of NGOs**. The political party reform package now awaits formal ratification by the Parliament and Council, with key provisions including **real-time donor transparency** and **revised co-financing rules** scheduled for implementation on **1 January 2026**.



Conversely, the design and mandate of the nascent NGO oversight body remain indeterminate. According to reporting by Euronews, this body will be constituted within the Committee on Budgetary Control (CONT), with the objective of scrutinising the European Commission's funding allocations to non-governmental organisations. The working group is reported to comprise 13 Members of the European Parliament, chaired by German lawmaker Niclas Herbst, and will feature co-rapporteurs from the centre-right European People's Party and the right-wing European Conservatives and Reformists group.

In response, civil society organisations and their progressive allies within the polity are mobilising to ensure that the operational procedures of this new working group adhere to fundamental democratic principles, including due process and procedural fairness (Genovese 2025).

The institutional design of the EU marked by its perceived “**democratic deficit**” has generated persistent concerns about citizen participation, legitimacy, and accountability. As decision-making authority has shifted to the supranational level, the gap between EU institutions and European citizens has widened, creating what scholars have termed a “**representation void**.” In response, NGOs have positioned themselves as conduits through which public interests, ethical values, and social priorities can influence EU policymaking. By providing expertise, mobilizing public opinion, and participating in formal consultation mechanisms, NGOs contribute to policy deliberation across a range

of sectors including human rights, environmental protection, migration, digital governance, and social justice.

Nevertheless, the growing influence of NGOs within the EU's lobbying ecosystem has become a subject of both academic and political scrutiny. While NGOs are normatively associated with democratic participation and public-interest advocacy, their institutional embeddedness and dependence on EU funding have raised questions about independence, representativeness, and accountability. A substantial body of scholarship has pointed to tendencies of “**elite capture**,” whereby large, well-funded, and professionalized NGOs often headquartered in Brussels dominate consultation processes and policymaking forums. This concentration of influence risks marginalizing smaller, grassroots organizations that lack the resources to engage effectively with EU institutions. Consequently, the NGO sector itself exhibits hierarchical and elitist tendencies that mirror the corporate lobbying structures it was originally intended to counterbalance.

Moreover, concerns regarding transparency, funding sources, and lobbying practices have further **complicated the narrative of NGOs as purely democratic actors**. Despite the establishment of **the EU Transparency Register**, information about the financial structures and lobbying activities of NGOs remains partial or opaque. This lack of transparency has prompted criticism that NGOs, while ostensibly serving the public interest, may perpetuate technocratic policymaking and align with institutional agendas rather than challenge them. The resulting tension between

NGOs' normative claims to represent civil society and their structural integration into EU governance lies at the heart of ongoing debates about legitimacy and power in supranational policymaking.

Against this background, this research paper investigates the multifaceted role of NGOs in EU lobbying, with particular attention to the democratic contributions they offer and the structural limitations they face. By situating NGOs within the broader framework of EU governance and interest representation, the paper aims to critically assess the balance between advocacy, institutional influence, and accountability.

## **Research Objectives and Scope**

This paper seeks to investigate the role and influence of NGOs within the lobbying landscape of the EU, exploring their contributions to policy development and democratic governance. The scope extends to examining the mechanisms NGOs employ to effect change, the institutional frameworks facilitating or constraining their activities, and the criticisms confronting their operations, particularly concerning elite capture and transparency.

The analysis prioritizes contemporary EU governance structures as well as recent scholarly debates on the legitimacy and efficacy of NGO lobbying. While acknowledging the broad range of interest groups active across the EU, this paper focuses specifically on NGOs, differentiating their contributions from those of corporate lobbyists and other actors. The geographic scope encompasses the

EU institutions headquartered in Brussels and Strasbourg, where most formal lobbying interactions occur.

The primary objective of this research is to analyze the dual role of NGOs in the EU's lobbying ecosystem both as promoters of democratic participation and as actors constrained by structural inequalities and institutional dependencies. The study seeks to provide a comprehensive understanding of how NGOs shape, and are shaped by, the EU's policymaking processes. Specifically, the research pursues the following objectives:

1. **To examine the role of NGOs as intermediaries between civil society and EU institutions** which involves analyzing how NGOs contribute to policy deliberation through consultations, advisory bodies, and public campaigns, and how their activities enhance or challenge the legitimacy of EU governance.
2. **To assess the (un)democratic potential of NGO lobbying.** Therefore the research evaluates the extent to which NGO participation promotes inclusivity, pluralism, and transparency within EU decision-making, and how it addresses the democratic deficit that has characterized the Union's institutional evolution.
3. **To identify and critically analyze structural and financial limitations affecting NGO influence.** Particular attention is given to issues of funding dependence, elite

capture, and the dominance of large, professionalized organizations over smaller, grassroots actors.

4. **To explore policy and institutional reforms aimed at improving transparency and equitable access.** The study proposes mechanisms that could strengthen NGO accountability, diversify funding sources, and ensure balanced representation of diverse societal interests in EU policymaking.

The scope of this research encompasses NGOs operating at the European level, particularly those engaged in policy advocacy and lobbying within EU institutions such as the European Commission, the European Parliament, and the Council of the European Union. While the paper acknowledges the diversity of the NGO sector, the focus remains on transnational organizations and umbrella networks headquartered or active in Brussels, given their proximity to EU decision-making centers. The study also draws upon case examples from sectors such as environmental policy to illustrate broader patterns and dynamics within the NGO lobbying landscape.

### **Methodological Approach**

The research adopts a **qualitative and interpretive methodological approach**, combining documentary analysis with insights derived from secondary literature and policy data. The choice of a qualitative design reflects the study's emphasis on understanding processes, relationships, and meanings rather than

measuring quantifiable outcomes. NGOs operate in a complex institutional environment where formal lobbying activities, informal networks, and discursive strategies intersect; thus, qualitative methods are best suited to capture the depth and nuance of these interactions. **Document Analysis** forms the core of the empirical investigation.

Key sources include official EU policy documents, consultation reports, NGO position papers, and entries in the EU Transparency Register. These materials provide evidence of lobbying practices, funding sources, and participation patterns in EU policymaking processes. Additionally, the study relies on **secondary academic sources**, encompassing scholarly books, peer-reviewed journal articles, and policy studies on EU lobbying, civil society, and governance. This literature provides theoretical and empirical foundations for analyzing the relationship between NGOs and EU institutions. Where available, the research also incorporates **qualitative interview data** from previous studies, policy reports, and public statements by NGO representatives and EU officials. Such material helps to contextualize the lived realities of NGO participation, highlighting both opportunities and constraints experienced by actors operating within the Brussels policy arena.

The analysis employs thematic coding to identify recurring patterns related to three key dimensions:

1. **influence and access**, focusing on how NGOs engage with policy making institutions;
2. **funding and autonomy**, examining how financial dependencies

shape advocacy behavior; and

2. **accountability and transparency**, assessing the extent to which NGOs disclose and justify their activities.

By synthesizing theoretical insights with empirical evidence, this methodological approach allows for a critical examination of how NGOs navigate the tension between advocacy and institutionalization in the EU context.

Comparative perspectives are integrated to contextualize the EU's unique multi-level governance framework and its implications for NGO activism. Where relevant, theoretical concepts such as elite capture and democratic legitimacy serve as analytical lenses. The approach emphasizes triangulation of sources to balance normative and empirical insights. This study is guided by a set of interrelated research questions designed to explore both the normative and empirical dimensions of NGO lobbying in the EU:

1. **How do NGOs influence policymaking and legislative processes within the European Union?** This

question examines the mechanisms of NGO engagement (formal and informal) and their role in shaping policy outcomes across different sectors.

2. **To what extent does the phenomenon of “elite capture” affect representational equality among NGOs?**

The study interrogates the internal power dynamics of the NGO sector, focusing on how professionalization and resource concentration influence which voices are heard in

Brussels. The “NGO elitism paradox” carries both normative and practical implications for the legitimacy of EU governance and policymaking processes.

**3. How do funding structures and institutional partnerships impact the autonomy and critical capacity of NGOs?** This question addresses the implications of financial dependency on EU and state funding for NGOs’ independence and advocacy agendas. The integration of NGOs into EU policymaking may risk transforming them from independent watchdogs into de facto instruments of institutional power.

**4. What policy or institutional reforms could promote greater transparency, diversity, and equity in NGO lobbying?** The final question seeks to translate analytical insights into actionable recommendations for enhancing the legitimacy and inclusiveness of EU governance.

The paper is organized into **5 interrelated chapters**, each addressing a distinct aspect of NGO lobbying within the EU’s political and institutional framework. Under the **first chapter** *NGOs as intermediaries in EU Governance* the paper focuses on the phenomenon called “The Paradox of Elite Capture” – the analysis explores how the concentration of resources and influence among large, professionalized NGOs undermines inclusivity and pluralism



within the EU's lobbying environment, illustrating a paradox of elite capture that challenges the democratic ethos these organizations claim to represent. **Chapter two**, *Funding Dependencies*, the paper further examines the implications of financial dependence on EU and state funding, revealing how such reliance can compromise NGO autonomy and weaken the integrity of their advocacy efforts. In addition, in **third chapter** – *Transparency and Accountability in NGO Lobbying*, the study evaluates existing transparency and accountability mechanisms in NGO lobbying, identifying significant gaps in regulatory frameworks that hinder effective oversight and public trust. Under the **fourth chapter** *Towards Equitable and Transparent EU Lobbying*, the discussion advances concrete policy and governance reforms aimed at promoting greater transparency, diversifying funding models, and ensuring equitable access to EU policymaking, thereby strengthening both democratic legitimacy and the inclusiveness of the lobbying process.

## **1 NGOs as Intermediaries in EU Governance**

The EU's unique political order, characterized by its multi-level governance structure, creates a complex environment where authority is dispersed and decision-making processes are inherently permeable. Within this arena, NGOs have evolved from peripheral advocates into central intermediaries, operating at the critical juncture between the European citizenry and the institutions of Brussels. They fulfill a dual function: channeling grassroots interests and expertise upward into the policy formulation process, while

simultaneously translating and monitoring EU policy downward for implementation and public scrutiny. This chapter argues that NGOs are not merely external influencers but have become institutionalized actors within the EU's governance framework, a development that presents both a solution to the Union's democratic deficit and a source of new challenges regarding its legitimacy and accountability.

This chapter will deconstruct the intermediary role of NGOs through a systematic analysis of their integration, methods, and the inherent tensions thereof. It begins by examining the role of NGOs in EU policymaking structures, mapping their formal and informal points of entry into the policy cycle, from agenda-setting to implementation. Following this, mechanisms of influence and access will detail the specific strategies from technical consultation to public campaigning that NGOs employ to shape policy outcomes. To ground this analysis, the concept of lobbying and civil society participation will explore the theoretical and practical distinctions between these often-conflated terms, clarifying the unique value proposition of NGOs in the democratic ecosystem.

The final sections will address the critical normative questions arising from this deep integration. Transparency, enhancing public participation and accountability will assess how NGO involvement can potentially make EU governance more inclusive and transparent, while also scrutinizing the accountability of the NGOs themselves. Finally, the chapter confronts the paradox of elite capture, investigating the risk that well-resourced, Brussels-

based NGOs may become disconnected from their constituencies, thus potentially replicating the very power imbalances they seek to rectify. Through this structure, the chapter provides a nuanced understanding of NGOs as indispensable, yet imperfect, intermediaries in the continuous shaping of European governance.

The EU uses the term **Civil Society Organizations (CSOs)** as a more inclusive category when engaging with non-state actors. The European Commission and European Economic and Social Committee (EESC) define CSOs as *“is an organisational structure whose members serve the general interest through a democratic process and which plays the role of mediator between public authorities and citizens”* (EUR-Lex).

According to EUR-Lex *“the concept of “CSOs” embraces a wide range of actors with different roles and mandates. Definitions vary over time and across institutions and countries. The EU considers CSOs to include all non-State, not-for-profit structures, non-partisan and non –violent, through which people organise to pursue shared objectives and ideals, whether political, cultural, social or economic. Operating from the local to the national, regional and international levels, they comprise urban and rural, formal and informal organisations. The EU values CSOs’ diversity and specificities; it engages with accountable and transparent CSOs which share its commitment to social progress and to the fundamental values of peace, freedom, equal rights and human dignity”* (EUR-Lex 2012).

The EU formally acknowledges the importance of civil society in promoting principles of good governance and participatory policymaking. The European Commission has increasingly invited NGOs to participate in European governance. It highlights the role NGOs play ‘*in fostering a more participatory democracy*’ (European Commission 2000), thus seemingly responding to debates on the EU’s democracy deficit<sup>1</sup>.

The European Commission’s commitment to supporting civil society organizations as a means of enhancing legitimacy and nurturing a vibrant European rather than solely national civil society is clearly reflected in its own policy statements. In 2000, the Commission published a discussion paper titled “*The Commission and Non-Governmental Organizations (NGOs): Building a Stronger Partnership*”, which articulated the EU’s strategic objectives for engaging with NGOs. These objectives included promoting participatory democracy, representing the collective interests of citizens within the EU, contributing to policymaking and project implementation, and advancing European integration (European Commission 2000).

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<sup>1</sup> The concept of a ‘**democratic deficit**’ in the EU was introduced in the 1970s by British academic David Marquand. He used this term to highlight issues with the democratic legitimacy of the European Community’s institutions. Essentially, the democratic deficit refers to the limited accessibility and representation of citizens from EU member states in the policy-making processes and institutions of the EU (Peak 2025).

While the involvement of NGOs in policymaking and project management aligns with the typical roles of interest groups in liberal democracies, the broader goals of this initiative clearly aimed to address the EU's so-called "democratic deficit."

The Commission envisioned NGOs as key actors in constructing a transnational civil society capable of strengthening the Union's legitimacy and visibility among European citizens. This aspiration is exemplified in the Commission's own assertion that "by encouraging national NGOs to work together to achieve common goals, European NGO networks are making a vital contribution to the formation of a 'European public opinion,' often regarded as a prerequisite for establishing a genuine European political entity" (European Commission 2000; Mahoney and Beckstrand 2011). In line with Habermas's theory of legitimacy, which posits that a polity requires a *demos* to be truly democratic (Habermas, 2001), the Commission thus identifies European civil society as instrumental in cultivating this *European demos* and reinforcing the democratic foundations of the Union.

Article 15 of the *Treaty on the Functioning of the European Union (TFEU)* explicitly recognises the role of civil society in ensuring transparency, accountability, and openness within EU governance structures. Complementing this, Article 11 of the *Treaty on European Union (TEU)* emphasises the necessity of maintaining an open, transparent, and regular dialogue between EU institutions and civil society organisations, particularly in the preparatory stages of legislative proposals. Civil society within the EU context

encompasses a diverse range of actors, including **social partners** such as trade unions and employers' associations, **non-governmental organisations** engaged in areas such as environmental protection and consumer rights, and **grassroots organisations**<sup>2</sup> representing community, youth, and family interests.

The *European Economic and Social Committee (EESC)* plays a central role in institutionalising this participatory framework by representing the interests of workers and employers at the EU level and contributing to the lawmaking process through consultative mechanisms. Furthermore, the establishment of sectoral social dialogue committees reinforces the involvement of social partners in shaping policy outcomes. In addition, the *European Commission* actively engages with non-governmental organisations through structured initiatives such as stakeholder dialogues and the *Progress Programme*, thereby enhancing inclusivity and participatory governance in the EU's policymaking processes (EUR-Lex 2025).

According to 2012 EU documents, CSOs were increasingly active in the economy, influencing local economies and monitoring national and international economic policies. The EU has a long

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<sup>2</sup> **Grassroots organizations** consist of groups of individuals who join together to advocate for a cause and promote social or political change. These organizations may operate at the local, regional, national, or even international level, uniting people from diverse backgrounds and age groups—from youth activists to senior community leaders. What distinguishes grassroots organizations is the collective action of ordinary citizens striving to achieve extraordinary outcomes. The term “grassroots” reflects their political and strategic orientation: an emphasis on addressing issues from their root causes and advancing change through a bottom-up approach that empowers communities to drive transformation from within (Adewunmi 2025).

history of supporting the "social economy," which prioritizes social impact over profit. Through associations of cooperatives, foundations, and NGOs, this sector promotes entrepreneurship and job creation by mobilizing communities, and helping the poor and marginalized generate income (EUR-Lex 2012).

NGOs, by contrast, are recognized as specific actors within CSOs, often registered entities that participate directly in EU policymaking and lobbying through formal mechanisms such as the Transparency Register, consultations, and advisory committees.

The concept of the non-governmental organization (NGO), first institutionalized by the United Nations (UN) in 1945 to formalize the participation of non-state actors in UN processes, has become increasingly prominent in both political and academic discourse. Its visibility grew particularly during the 1980s and 1990s, as neoliberal policy agendas sought to reduce the role of the state and delegate responsibilities to markets and other societal actors, including NGOs. Despite its widespread use, the term *NGO* overlaps with related concepts such as *non-profit*, *voluntary*, and *civil society organizations* (Lewis 2010). These variations reflect not only regional and historical differences in terminology but also the inherent **diversity of NGOs** as organizational forms.

According to Lewis (2010), NGO activities generally fall into two broad categories: **service provision** and **political advocacy**. Within the EU context, many NGOs function as umbrella organizations, engaging in political advocacy on behalf of their member associations (Schoenefeld 2020), while others represent

globally active movements such as Greenpeace **or the** World Wide Fund for Nature (WWF). Fundamentally, an NGO denotes an entity that is neither governmental nor market-based, often referred to as part of the **“third sector.”** This positioning provides NGOs with a perceived legitimacy and independence, distinguishing them as defenders of the **public interest** (Grant 2001). Environmental organizations, in particular, have reinforced this perception by combining professional advocacy with strong media visibility and public engagement strategies.

The NGO frame, however, has been subject to critique for idealizing NGOs as neutral, altruistic actors, despite the political and strategic nature of their work (Grant 2001; Schoenefeld 2020). Nevertheless, the label continues to enjoy broad acceptance, especially within environmental and social advocacy sectors. Keyword analyses of academic publications using the term *NGO* further corroborate this orientation, with frequent associations to concepts such as “environment,” “social,” “governance,” and “stakeholders.”

Scholars such as Kohler-Koch and Rittberger (2006) argue that NGOs represent a **core component of civil society**, though the NGO framework differs from the broader civil society organization (CSO) model. Unlike the CSO frame, which emphasizes participatory and deliberative democratic functions, the NGO framework is rooted in **governance theory**, emphasizing **network-based coordination** rather than hierarchical state control (Fukuyama 2016). This shift underscores a conceptual evolution



from viewing NGOs as merely participatory actors to recognizing them as key nodes in **multi-level governance structures**, integral to the EU's broader system of policy-making and societal steering (Schoenefeld 2020).

### **1.1 The Role of NGOs in EU Policymaking Structures**

NGOs play a vital and multifaceted role within the policymaking structures of the EU, acting simultaneously as advocates, experts, intermediaries, and participants in its complex system of multilevel governance. Through **lobbying and advocacy**, NGOs seek to influence EU policy outcomes across a range of areas, including human rights, environmental protection, social justice, and migration, thereby amplifying marginalized voices and pressing policymakers to adopt more inclusive and rights-based approaches (Masiulytė 2025).

NGOs contribute specialized knowledge and perspectives to EU decision-making, thereby enhancing its inclusiveness, transparency, and democratic legitimacy (Greenwood 2017).

Their **formal participation in policymaking** is institutionalized through mechanisms such as expert groups, public consultations, and advisory committees, where they contribute technical expertise, shape policy agendas, and enhance democratic legitimacy by embedding civil society perspectives into decision-making processes. Through participation in formal mechanisms such as public consultations, expert groups, and advisory committees, NGOs influence both legislative and regulatory outcomes while

articulating the interests of marginalized or underrepresented groups (Kohler-Koch and Quittkat 2013).

In several policy domains, most notably environmental governance NGOs function as **regulatory intermediaries**, translating EU regulations for local implementation, promoting public participation, monitoring compliance, and acting as watchdogs to ensure accountability among member states and EU institutions.

CSOs are crucial intermediary organizations that connect citizens with policymakers. By acting as a bridge between the preferences of civil society and the actions of policymakers, therefore can supplement the deficiencies of public institutions and contribute to a well-functioning democracy, promoting the legitimacy and effectiveness of governance systems (Greenwood 2007; Kohler-Koch 2010). Yet, as several studies have indicated, the representative function of many CSOs and NGOs is severely flawed. And even when CSOs successfully involve their membership base to ensure representativeness, they may lack the organizational capacity that facilitates an effective interaction with policymakers (Albareda 2018).

NGOs, as part of civil society organizations (CSOs), can also act as channels for communication and influence and act as so called **“transmission belts”** between EU institutions and citizens, translating complex policy debates into accessible public discourse and facilitating societal engagement in European governance (Albareda 2018). However, the growing institutional embeddedness

of NGOs has also raised questions about representativeness and independence, as resource asymmetries and reliance on EU funding may privilege large, professionalized organizations over smaller grassroots actors.

According to recent survey data from Standard Eurobarometer 103 (2025), **52%** of Europeans express trust in the EU, marking the highest level of confidence recorded since 2007. An identical proportion 52% also report trust in the European Commission, representing an 18-year peak. In terms of public perception, 43% of EU citizens hold a positive image of the Union, while 38% view it neutrally and 18% negatively. Furthermore, 62% of respondents remain optimistic about the EU's future, suggesting a generally favorable outlook toward European integration. Notably, an overwhelming 88% of Europeans agree on the need for enhanced, rules-based cooperation between countries and regions worldwide, underscoring broad public support for multilateralism and collaborative global governance.

In comparison, according to the Eurobarometer 54 from Autumn 2000 survey, only **50%** of EU citizens regarded European integration as a positive development, while merely 47% believed their country had benefited from it. In response to this relatively low level of public support, both policymakers and scholars began to focus greater attention on **NGOs** such as Greenpeace, BEUC (the European Consumers Union Bureau), and ActionAid, viewing them as potential catalysts for political engagement and social change. NGOs, with their extensive supporter bases and claims of operating

through more participatory and “alternative” modes of action, were increasingly seen as instruments for fostering political socialization and bridging the gap between citizens and EU institutions. Historically, the EU has demonstrated a strong capacity to attract lobbyists and to construct broad coalitions that align with its institutional objectives, and NGOs have often been incorporated within these networks (Warleigh 2001).

In the past NGOs could exert meaningful influence over particular policy outcomes through their participation in policy coalitions, their overall impact on EU policy output remains weaker than that of **corporate lobbyists** (Balanyá et al. 2000).

As part of ongoing efforts to address the EU’s so-called “democratic deficit,” increasing attention has been directed toward the Europeanization of civil society, traditionally understood as a sphere that both constrains state power and fosters social solidarity among citizens. This approach reflects the evolving nature of EU politics and the recognition that strengthening participatory mechanisms within civil society may enhance the overall democratization of European governance. Within this context, NGOs are regarded as key catalysts in promoting citizen engagement, representing diverse interests, and bridging the gap between EU institutions and the broader public (Warleigh 2001).

Nevertheless, despite NGOs formal inclusion, the participatory landscape often privileges large, professionalized, and well-resourced organizations, **raising concerns about representativeness and equity**. Financial dependence on EU

funding can further constrain NGOs' critical independence, while maintaining a balance between collaborative partnership and **autonomous advocacy remains a persistent challenge**. Overall, NGOs constitute indispensable actors in EU policymaking, contributing to advocacy, expert deliberation, and regulatory mediation, yet their effectiveness and legitimacy continue to be shaped by enduring tensions surrounding inclusivity, independence, and democratic representation (Zeegers 2016; Beyers, Eising and Maloney 2008).

The conceptualization of NGOs within the broader field of interest group research remains both complex and contested. As Beyers et al. (2008) observe, the study of interest representation is characterized by a proliferation of neologisms terms such as *interest groups*, *political interest groups*, *interest associations*, *organized interests*, *pressure groups*, *public interest groups*, *citizen groups*, *social movement organizations*, and *civil society organizations* and each emerging from distinct research traditions and normative perspectives. Jordan and Maloney (2007) further highlight that the label *interest group* encompasses a wide spectrum of entities, ranging from hierarchically structured, resource-rich organizations to informal, activist-based collectives and even private or semi-public bodies. This conceptual plurality reflects both disciplinary fragmentation and the empirical diversity of actors seeking to influence policymaking.

In response to this definitional ambiguity, scholars commonly identify three key characteristics that delineate an actor

as an *interest group*: **organization, political interests, and informality**. The organizational dimension refers to structured and collective forms of political behavior, thereby excluding diffuse social movements or general public opinion from this category. The *political interests* criterion relates to the intent and activities of these organizations in shaping policy outcomes through advocacy and representation linking interest group research to broader theories of political representation. Finally, *informality* denotes the distinctive operational mode of interest groups, which, unlike political parties, do not compete for electoral office but instead exert influence through continuous, often informal, interaction with policymakers and bureaucrats. While these features collectively help delineate the contours of interest groups, the resulting landscape remains heterogeneous. As Truman (1993) notes, many organizations exist as *latent interest groups*, possessing the potential for political mobilization even if they do not actively engage in advocacy at all times. Within this framework, NGOs can be viewed as a specific subtype of interest groups formalized, professionalized, and normatively oriented actors that combine technical expertise with advocacy to influence public policy both within and beyond the institutional structures of the EU (Beyers et al. 2008).

Scholarly debates concerning the terminology of organized interests reveal a persistent conceptual and normative tension between the use of the terms *Non-Governmental Organizations (NGOs)* and *interest groups*. Much of the literature deliberately avoids the “interest group” label, often due to its association with

self-interested or insider lobbying, typically conducted by narrow economic or sectional actors. In contrast, scholars within the *interest group* tradition emphasize the semi-institutionalized nature of lobbying and highlight the functional importance of resources such as expertise, information, and technical knowledge.

Rather than depicting organized interests as peripheral actors or mere petitioners at the gates of policymaking, this perspective recognizes that policymakers and bureaucrats themselves possess distinct interests and often rely on external actors for authoritative data, legitimacy, and policy-relevant insights. From this standpoint, interest groups are seen as integral to the democratic process providing functional expertise and contributing to the effective operation of complex governance systems rather than as disruptive or self-serving entities.

Nonetheless, as Grant (2002) observes, these conceptual distinctions are often less clear-cut in practice. Despite analyzing similar forms of collective political organization, scholars frequently attach divergent labels such as *NGOs*, *public interest groups*, *diffuse interests*, or *social movement organizations* reflecting differing theoretical traditions and normative orientations. This bifurcation in terminology also reveals an underlying moral dimension: **“NGOs” has become a positively charged or “hurrah” term**, whereas “interest group” retains the pejorative connotations of a “boo” word, signifying self-interest and instrumentalism (Beyers et al. 2008).

**Interest representation and groups** are a systemic and foundational element of EU policymaking and integration, as

recognized in the TEU. NGOs play a pivotal role within this system, acting as both sources of technical and political information and as proxies for civil society, which is largely absent at the EU level.

NGOs supply EU institutions with both technical expertise and political perspectives. The EU, in turn, utilizes NGOs as agents of political communication, facilitating dialogue between institutions and the broader public. As Greenwood (2019) notes, *“Interest organisations act as a proxy for an otherwise largely absent civil society, with a teeming population of groups advocating for every imaginable cause”*.

Where gaps exist in civil society representation, EU institutions have actively stimulated the formation of new groups, resulting in a pluralist system of checks and balances. However, the literature also identifies “islands” of corporatist practice, particularly in certain policy domains.

EU institutions have developed a range of procedures to support an open and structured dialogue between the Commission and special interest groups, now largely packaged as the ‘Better Regulation’ programme. Measures include the following:

- Funding for NGOs
- Consultation procedures with impact assessments
- The Transparency Register for lobbying transparency
- Access to documents for civil society oversight



These mechanisms are designed to ensure pluralism and transparency, making it impossible for any one type of interest to capture the diversity of EU decision making (Greenwood 2019).

## **1.2 The Concept of Lobbying in Brussels**

Brussels ranks as the world's second-largest hub for lobbying, following Washington, D.C. Although civil society actors are present, the majority of lobbying efforts are conducted by professional lobbyists. According to a 2020 report, the city hosts approximately 25,000 lobbyists, with around 11,000 officially listed in the Transparency Register – a figure consistent with a 2017 Corporate Europe Observatory estimate. Annual lobbying expenditures in Brussels are estimated at around €1.5 billion, with certain industries attracting particularly intense advocacy efforts. Furthermore, a 2021 OECD report highlighted that digital policy issues have become a major focus of lobbying activities in both the EU and the United States. (EP Briefing 2023).

The concept of lobbying lacks a universally accepted definition, as interpretations vary across national, international, and academic contexts. According to the Organisation for Economic Co-operation and Development, lobbying is defined as an attempt made within legal limits to influence the design, implementation, and evaluation of public rules and policies for which public officials in the legislative, executive, or judicial branches are responsible at the local, regional, or national level. This definition suggests that

lobbying encompasses the full scope of activities aimed at shaping public sector decision-making processes (OECD 2021; OECD 2025).

Britannica (2025) describes lobbying as “*any attempt by individuals or private interest groups to influence the decisions of government; in its original meaning it referred to efforts to influence the votes of legislators, generally in the lobby outside the legislative chamber. Lobbying in some form is inevitable in any political system*”.

Similarly, Anthony Nownes (2006), in his work *Total Lobbying*, highlights the multifaceted nature of lobbying by identifying six key dimensions that together provide a comprehensive understanding of the phenomenon. Nownes emphasizes that lobbying may take diverse forms and be undertaken by various types of organizations across all policy sectors. Its overarching goal is to influence public decisions within any branch of government legislative, executive, or judicial at all administrative levels, from local to national. Importantly, lobbying does not always yield tangible outcomes, yet it remains an integral component of modern governance and policy formulation.

At the EU level, a comprehensive regulatory framework governs the practice of interest representation and lobbying. The foundation of this framework lies in **Article 11 of the Treaty on European Union (TEU)**, which mandates that EU institutions “shall give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of

Union action.” This provision underscores the role of interest representation as a mechanism for improving the quality and legitimacy of EU decision-making. The same treaty also imposes an obligation on EU institutions to ensure a transparent, accessible, and coherent framework for dialogue, enabling stakeholders to be consulted on issues that directly affect them.

A key milestone in institutionalizing legitimate interest representation was the **Interinstitutional Agreement (IIA)** between the **European Parliament** and the **European Commission** establishing the *Transparency Register* in 2011. The register was designed to jointly record and monitor actors engaged in influencing EU policymaking processes (European Union 2011). However, the voluntary nature of registration drew criticism for its limited effectiveness in ensuring transparency (Chambers, 2016). To address these shortcomings, the framework was revised through the **2021 Interinstitutional Agreement** among the European Parliament, the Council of the EU, and the European Commission, which introduced a binding Transparency Register (European Union 2021).

This reform enhanced coordination between institutions and established unified monitoring of “interest representatives” defined as any natural or legal persons, groups, or associations seeking to influence EU policymaking.

The 2021 agreement also introduced a **Code of Conduct** outlining obligations for registrants, including the disclosure of interests, objectives, clients, and financial resources when engaging

with EU institutions. It explicitly prohibits improper influence, pressure tactics, or unethical behavior, and imposes conflict-of-interest safeguards, particularly for former EU officials transitioning into lobbying roles (European Union, 2021b). Historically, the prerogative of EU institutions to regulate their own internal rules had led to fragmented standards for lobbying (Coen and Richardson 2009). The 2021 coordination among the three institutions marked a significant step toward greater coherence and accountability in EU lobbying governance.

Further reforms have been introduced at the institutional level. Since **2019**, Members of the European Parliament (MEPs) are permitted to meet only with lobbyists registered in the joint Transparency Register, while rapporteurs, shadow rapporteurs, and committee chairs must publicly disclose all scheduled meetings with interest representatives (European Parliament, 2021). Moreover, only registered lobbyists may attend intergroup meetings or access Parliament buildings through accreditation badges, which are contingent upon compliance with strict ethical standards. MEPs are explicitly prohibited from engaging in paid lobbying activities related to EU decision-making, and former MEPs must disclose any such engagements, forfeiting certain privileges during this period (European Parliament 2021b).

The **European Commission** (EC) enforces similar standards through its **2018 Code of Conduct for Members of the Commission**, which requires Commissioners and their staff to meet only with registered lobbyists and to disclose details of such

interactions (European Commission 2018). Former Commissioners must observe a two-year “cooling-off” period before undertaking lobbying activities, extended to three years for former Commission Presidents. Together, these measures form a structured and increasingly harmonized framework for ethical, transparent, and accountable interest representation within the EU.

### 1.3 The Paradox of Elite Capture

*“We’re not from the government, but we’re here to help.”* (The American Enterprise Institute 2003).

**Elitism** and **professionalization** have increasingly characterized the staffing and operation of NGOs, reflecting what Petras (1999) describes as a growing *corporatisation* of the sector. As NGOs expand into complex bureaucratic entities, leadership positions are often occupied by elites and highly trained professionals, leading these organizations to operate more like businesses. While the employment of skilled professionals can enhance organizational efficiency, it also introduces a socio-cultural divide between NGO staff and the communities they intend to serve. As Lehr-Lehnardt (2005) observes, such professionals typically come from markedly different social, educational, and economic backgrounds than their beneficiaries particularly when working with impoverished or marginalized populations in the Global South resulting in a lack of genuine understanding and connection.

This growing professional and organizational distance risks alienating NGOs from the grassroots constituencies they claim to represent. The irony of this detachment is aptly captured by a paraphrased inversion of Ronald Reagan's famous remark: if the most alarming phrase in the developed world was once "I'm from the government and I'm here to help," then, as noted by the American Enterprise Institute (2003), in much of the developing world today, it might equally be said that "we're not from the government, but we're here to help." This critique underscores a fundamental tension within contemporary NGO practice between professionalism and proximity, efficiency and empathy, representation and detachment (Wright 2012).

In recent decades, NGOs have emerged as influential actors within European and global governance, shaping agendas in areas such as human rights, the environment, and development. However, scholars have increasingly warned that the professionalization and institutionalization of NGO activity have resulted in forms of **elite capture**, whereby a limited number of large, well-resourced organizations dominate access to policymakers, funding streams, and decision-making forums.

Critics contend that NGO professionals have become increasingly disconnected from the marginalized and uneducated populations they purport to represent. In essence, these professionals cannot truly embody the perspectives of the powerless and voiceless, as they themselves are neither powerless nor voiceless and, in many cases, never have been. This detachment raises

concerns about the authenticity of representation within the NGO sector (Lehr-Lehnardt 2005).

**The EU's lobbying environment** structurally favors organizations with extensive financial and technical capacities, allowing them to embed themselves within policy networks and advisory structures. This often marginalizes smaller, grassroots NGOs that lack comparable resources or Brussels-based representation. As a result, “**NGO elitism**” emerges as a paradox in which actors representing civil society reproduce **the hierarchical and exclusionary patterns** they were meant to challenge.

In the late 1990s and early 2000s, the European Commission briefly considered introducing a framework that would grant special privileges to organizations capable of “*demonstrating their representativeness and capacity to lead debates*” (European Commission, 1997; 2000). However, this initiative was soon abandoned due to the significant methodological and political challenges involved in determining and measuring *representativeness* and *leadership*, as well as widespread opposition including from the European Parliament to the notion of privileging certain civil society actors.

Despite this, civil society organizations operating at the EU level have continued to self-organize into thematic alliances or “families.” A prominent example is the Green10, a coalition of ten major environmental NGOs that regularly (often bi-monthly) engage in structured dialogues with the European Commission. These groupings manage their own membership boundaries and often

participate in EU-funded projects, creating semi-formalized channels of interaction with EU institutions.

Such arrangements reflect **corporatist tendencies** within specific policy domains, even though corporatism at the systemic level remains improbable within the EU's governance architecture, where a model of **pluralism** – open competition among diverse interest groups is institutionally favored. Scholars have therefore described the EU's interest representation system as a form of “**elite pluralism**” (Eising 2007) or “**chameleon pluralism**” (Coen 2013), denoting a flexible and adaptive relationship between EU institutions and civil society, where inclusiveness and expertise coexist with structured, selective engagement (Greenwood 2019).

According to Santilli and Scaramuzzino (2025) NGOs, as *“an elite group occupies a unique position as both stewards of tradition and catalysts for change within civil society. The group's socio- demographic composition reflects historical legacies of privilege and exclusion, yet their individual attitudes and actions signal a departure from entrenched norms and a willingness to challenge the status quo. As agents of social transformation, the civil society elite have the potential to catalyse inclusive leadership structures, encourage intergenerational dialogue, and promote progressive agendas that resonate with the diverse constituencies they serve. Their attitudes and ideological orientations challenge prevailing narratives regarding elite capture and institutional bias by demonstrating a departure from expected elite norms towards progressive values and advocacy for social justice”*.



However, the concentration of resources and influence among large, NGOs within the EU creates a structural paradox that challenges the principles of inclusivity and pluralism in EU governance. While these well-established NGOs possess the capacity to shape policy agendas, mobilize expertise, and secure substantial EU funding, their institutional dominance often marginalizes smaller, less formalized civil society actors, thereby narrowing the representational spectrum of societal interests. The accumulation of financial, human, and organizational resources by large NGOs enables them to engage more effectively in high-level advocacy and to maintain privileged access to EU policymakers. This resource asymmetry reinforces their visibility and influence, frequently at the expense of grassroots movements and community-based organizations, which struggle to compete within the highly institutionalized EU policy environment.

A survey by the European Court of Auditors (ECA) asked NGOs whether they considered EU and national transparency requirements in funding calls to be excessive. Over 90% of respondents disagreed, indicating that they did not view these requirements as overly burdensome. Among the minority who did express concerns primarily smaller NGOs the main issue cited was the complexity of national-level reporting obligations related to the use of received funds (ECA 2025b).

Many contemporary NGOs continue to advocate for the rights of the marginalized and voiceless, even though they are **not formally elected by the populations** they claim to represent.

Nonetheless, the critique of their lack of democratic legitimacy carries significant weight. The growing elitism within the NGO sector, coupled with the influence of wealthy Northern donors who whether intentionally or not shape agendas through selective funding, has prompted accusations from Southern NGOs and scholars that the global NGO movement perpetuates forms of cultural imperialism.

While it may be neither feasible nor necessarily appropriate for NGOs to adopt formal democratic structures or directly represent global constituencies, they should nonetheless be held accountable for their claims of representation. Such claims, often invoked when seeking to influence law, policy, or attract funding, serve to enhance the perceived legitimacy of NGOs but are frequently self-interested. This raises important questions about the authenticity and accountability of NGO advocacy within global governance structures (Lehr-Lehnardt 2005).

The growing prominence of professionalized NGOs has also contributed to the emergence of an **elitist dynamic** within EU civil society. As these organizations become increasingly integrated into policymaking structures, they risk reproducing a form of *elite capture* – a condition in which a small number of powerful actors dominate decision-making processes intended to be participatory and democratic. This dynamic can undermine representational diversity, as smaller organizations often more embedded in local contexts or representing marginalized groups lack the necessary resources or administrative capacity to engage effectively in EU-

level advocacy. Consequently, the civil society landscape becomes increasingly hierarchical, privileging well-funded and institutionally embedded actors while constraining the pluralism essential for democratic legitimacy.

From a theoretical standpoint, this concentration of influence resonates with governance theories of **elite capture and institutional isomorphism**, which describe how resource-rich actors adapt to and dominate institutional environments, often shaping norms and practices to their advantage. The result is a form of “*civil society elitism*” that not only limits participatory diversity but also risks eroding public trust in EU governance if citizens perceive civil society as co-opted or unrepresentative.

It is important to highlight how international NGOs, particularly in development and environmental governance, may align with donor and institutional priorities to secure funding, thereby blurring the line between advocacy and co-optation. This financial dependence can compromise autonomy and foster **institutional conformity** rather than critical engagement. In the EU context, Greenwood (2011) notes that NGO participation in consultative processes increasingly reflects a “**professionalized civil society**”, where technical expertise and administrative capacity outweigh representativeness and grassroots legitimacy.

Thus, the **elite capture** of NGOs manifests in three interlinked dimensions:

1. **Resource concentration** – dominance of large, well-funded NGOs
2. **Institutional embeddedness** – privileged access to EU institutions and funding mechanisms (Coen and Richardson 2009).
3. **Legitimacy paradox**<sup>3</sup> – declining democratic representativeness despite increased visibility and influence (Warleigh 2001).

Addressing this paradox requires a deliberate rebalancing of power dynamics within the EU's participatory framework. Policy measures should prioritize equitable funding distribution, capacity-building initiatives for smaller and emerging NGOs, and enhanced transparency mechanisms that encourage inclusivity. Strengthening these measures could help democratize access to policymaking, ensuring that the voices of diverse and less institutionalized actors are meaningfully incorporated into the EU decision-making process.

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<sup>3</sup> The growing role of NGOs in trade policy consultations has compelled firms to pay increased attention to their public image. A representative from a major petroleum company even estimated that as much as 80 percent of his public affairs work now involves engagement with NGOs rather than with governments. Nonetheless, businesses continue to serve as the primary source of technical expertise on trade barriers and therefore remain crucial actors whenever the EU seeks to strengthen its negotiating position with partners such as the United States. Although NGOs can shape the broader discourse and tone surrounding trade negotiations, their direct influence on specific policy outcomes should not be overstated. The European Commission, for its part, makes an effort to include NGO perspectives through mechanisms such as the Civil Society Dialogue (Coen and Richardson 2009).

Essentially, while large professionalized NGOs play an essential role in shaping EU policies, their dominance poses significant challenges to inclusivity and democratic pluralism. Achieving a more balanced and representative civil society necessitates structural reforms that empower smaller organizations, foster equitable participation, and safeguard the EU's commitment to participatory democracy. In sum, while NGOs are integral to EU policymaking and global advocacy, their growing institutional power raises questions about democratic inclusivity and pluralism. This has led to calls for reforms promoting **transparency, equitable funding, and capacity-building for smaller NGOs** to mitigate elite capture and ensure that civil society remains genuinely representative.

## **2 Funding Dependencies**

Funding dependencies in relation to NGOs refer to the extent to which NGOs rely on external financial sources, particularly donor funding, which significantly affects their autonomy, effectiveness, and sustainability. NGOs dependent on foreign or institutional funding often face pressures to align their activities with donor priorities, which may not always coincide with local needs or organizational missions. Such dependency can lead to mission drift, where NGOs prioritize donor-driven short-term projects over longer-term community empowerment.

The EU provides extensive support to a wide range of interest groups including business associations, trade unions, professional organizations, NGOs, and charities through subsidies, project grants, and regional funding schemes. Scholars have debated the impact of this funding on creating a balanced and inclusive system of interest representation. Early research suggested that EU funding enables participation of NGOs that might otherwise remain unrepresented, thereby mitigating existing biases in EU interest representation (Mahoney and Beckstrand 2011; Sanchez Salgado 2014; Salgado et al. 2024).

However, more recent studies challenge this perspective, indicating that better-resourced and experienced organizations, often with a history of EU funding, disproportionately benefit from these resources, potentially reinforcing, rather than reducing, **pre-existing inequalities within the interest group landscape** (Salgado et al. 2024).

The European Commission provides direct financial support to thousands of NGOs across Europe. Many of these organisations engage in politically oriented activities and operate within the broader framework of EU policymaking. Unlike traditional models of civil society representation, which typically reflect the interests of specific social groups, these NGOs often act as intermediaries that amplify or align with the policy objectives and priorities of EU institutions. Fidesz MEP Csaba Dömötör has published a searchable database of over 37,000 EU Commission

contracts with NGOs, worth **€17 billion** between 2019 and 2023 (Hungary Today 2025).

The database serves as a key instrument for promoting transparency and accountability in EU funding practices. It offers a comprehensive overview of NGOs that received financial support from the European Commission between 2019 and 2023, thereby contributing to public insight into the nature, scope, and distribution of EU-funded civil society activities.

In November 2024, the European Commission notified environmental non-governmental organisations (NGOs) that funding received through the EU's Programme for the Environment and Climate Action (LIFE) could no longer be used to finance advocacy or lobbying activities. This decision, reportedly driven by the European People's Party (EPP) and supported by far-right political groups, aligns with the EPP's broader electoral agenda to reduce the scope of environmental and sustainability regulations.

The **LIFE programme**, with a total budget of **€5.4 billion for 2021–2027**, plays a crucial role in promoting environmental protection, restoration, and the transition to a circular and sustainable economy. Within this framework, environmental NGOs and civil society organisations such as WWF, Friends of the Earth, and ClientEarth, among others, collectively receive around €15.6 million per year in operating grants. Although this sum constitutes only 0.006% of the EU's annual budget, these funds are vital for covering the operational costs of organisations that support EU policy objectives. In comparison, the **50 companies with the**

**largest lobbying budgets** spent nearly **€200 million** on EU lobbying in 2024, raising concerns over the balance of influence between corporate and civil society actors.

The new restrictions prohibit certain forms of engagement with EU institutions that were previously permissible, including the organisation of meetings, the distribution of advocacy materials, and the targeting of specific EU officials for discussions on policy outcomes. As reported by *POLITICO*, these limitations effectively curtail NGOs' capacity to influence EU decision-making processes (Politico 2024).

According to A. Alemanno, Professor of EU Law at HEC Paris and founder of *The Good Lobby*, this change represents a veiled attempt to narrow the operational space of civil society organisations. He argues that such a restriction undermines the fundamental purpose of EU funding for NGOs namely, to ensure equal access to policymakers and to strengthen democratic participation (The Good Lobby 2025).

## **2.1 Sources of NGO Funding in the EU Context**

In the EU's context, NGO funding is derived from several principal sources that reflect both institutional support and alignment with EU policy objectives.

**Institutional and Operating Grants** are a substantial portion of NGO financing comes directly from the **European Commission** and other **EU institutions** through operating grants designed to



sustain core activities. These funds are typically distributed under specific EU programmes addressing thematic priorities such as environmental protection, health, social policy, research, and human rights, for instance, the *EU Health Programme* or *Europe for Citizens Programme*.

Project-Based Funding or EU Institutional Grants and Operating Support many NGOs also obtain **project-specific grants** through competitive calls for proposals within EU framework programmes such as *Horizon Europe* or sectoral initiatives. These grants usually target projects that contribute to the EU's strategic and policy goals, making NGOs key actors in policy implementation and innovation.

NGOs in the EU have access to a wide array of funding opportunities across multiple policy domains, reflecting the EU's strategic commitment to fostering civil society engagement. Approximately **80%** of these funding sources are administered at the national level, with managing authorities providing detailed information on application procedures, while the remaining funds are directly managed by the European Commission or its agencies. NGOs addressing social inclusion, gender equality, and equal opportunities can access support through the European Social Fund Plus (ESF+), administered regionally or nationally.

Cultural and media initiatives are supported via the Creative Europe programme, which comprises the Culture and MEDIA sub-programmes, offering funding for cooperation projects, networks, literary translation, audiovisual production, and training;

this programme is managed by the European Education and Culture Executive Agency (EACEA).

Civic participation and rights-based initiatives benefit from the Citizenship, Equality, Rights and Values (CERV) programme, also under EACEA, which aims to strengthen democratic, inclusive, and rights-based societies. Research-focused NGOs can apply for Horizon Europe funding, supporting diverse projects across multiple disciplines.

For international development and humanitarian activities, funding is available through the Commission's International Cooperation and Development (INTPA) and Humanitarian Aid and Civil Protection (ECHO) departments. Additionally, the Connecting Europe Facility (CEF), managed by the European Climate, Infrastructure and Environment Executive Agency (CINEA) and the European Health and Digital Executive Agency (HaDEA), provides opportunities in transport, energy, and ICT sectors. NGOs may also seek funding under the LIFE programme and other calls issued by the Service for Foreign Policy Instruments (FPI), highlighting the breadth of EU support available for civil society actors engaging in policy, advocacy, and project implementation (EC 2025).

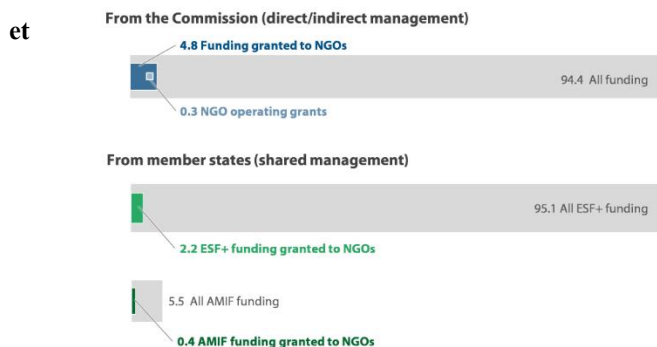
**Partnership and Policy Collaboration** – the EU frequently collaborates with NGOs through multi-stakeholder partnerships and networks, funding them indirectly to carry out policy-related functions such as capacity building, public advocacy, and service delivery. These arrangements reinforce the participatory and consultative nature of EU governance (FASI 2025).

**Private and Alternative Funding Sources** – Although less dominant, some NGOs diversify their income through private donations, philanthropic foundations, or innovative financing mechanisms such as crowdfunding and social impact investments.

Overall, the financial sustainability of NGOs in the EU depends heavily on their capacity to align with EU policy frameworks and to manage the administrative and strategic challenges of navigating complex funding mechanisms. Research indicates that NGOs that maintain cooperative and institutionalised relationships with EU bodies tend to secure greater access to funding, whereas those adopting a more critical or adversarial stance may face significant barriers in obtaining financial support.

Based on the Financial Transparency System and financial data received from managing authorities, the ECA stipulates that NGOs received less than 4 % of funding from the EU budget for the selected internal policies during the 2021-2023 period (ECA 2025b).

**Figure 1 | NGOs received less than 4 % of funding from the EU budget**



## 2.2 EU Grants and the Question of Autonomy

The relationship between EU funding allocation and organizational characteristics, particularly among NGOs, remains largely underexplored in the European context. Nonetheless, interest groups have frequently faced criticism for their limited democratic credentials, especially concerning internal democracy at both the national and EU levels (Kohler-Koch and Quittkat 2013; Salgado et al. 2024).

Given the key role of interest groups in ensuring input and throughput legitimacy at the EU level, deficits in internal democracy and representativeness may raise concerns for funders. In the absence of these qualities, NGOs and other interest groups can be perceived as **elite entities**, detached from active member engagement and participatory processes (Salgado et al. 2024).

While associations within EU-level networks are typically involved in shaping policy positions, participation varies depending on the issue area and membership inequalities (Albareda and Fraussen 2023). Such disparities in engagement are often interpreted as a form of bias that could undermine the democratic potential of these groups. At the same time, some argue that critiques of accountability deficits rely on high normative standards, whereas, in practice, EU-level interest groups are often seen by their members as effective advocates for broader political objectives (Salgado et al. 2024).

Countries differ considerably in the generosity of their funding schemes for interest organizations (Wang 2006). In Western Europe, as well as at the level of the European Commission, billions of euros are allocated to support various types of interest organizations. While such funding ensures the continuation and survival of recipient organizations, it simultaneously creates a dependency on state resources (Crepaz and Hanegraaff 2022).

Research indicates that many funded organizations, even in OECD countries, would be unable to survive without these public funds, which constitute the primary source of income for civil society organizations (Wang 2006). This dependency has been associated with at least two negative effects. First, once funding is secured, organizations may prioritize grant acquisition over constituency engagement or service provision, as the former enhances organizational survival (Mosley 2012).

Second, reliance on state funding can undermine **organizational autonomy**, leading organizations to align with government agendas rather than the interests of their constituents out of concern for losing future support (Crepaz and Hanegraaff 2022). Consequently, interest organizations may become less critical of public policy due to perceived risks of funding repercussions. Leaders of NGOs frequently report reluctance to challenge governments that provide financial support, describing a fear of “*biting the hand that feeds them*” (Onyx et al. 2008; Crepaz and Hanegraaff 2022).

Organizations lacking government funding similarly express concerns that adopting critical positions could jeopardize future support (Chaves et al., 2004). Although actual retaliation is rarely documented, NGO staff have reported instances of punitive measures (Chaves et al., 2004), and many nonprofits remain cautious about engaging directly with government officials to avoid endangering their contracts (Smith, 2003; Crepaz and Hanegraaff 2022).

EU grants significantly influence NGO autonomy, with a nuanced balance between enabling support and conditional constraints. EU funding empowers NGOs by providing essential resources that support their operations, advocacy, and policy engagement. However, this support can come with administrative burdens, regulatory requirements, and expectations that may shape NGO priorities and strategies toward alignment with EU policy goals.

While EU grants typically do not impose direct political control, NGOs often adjust their agendas, messaging, and activities to meet donor criteria and eligibility rules, which risks constraining their independent decision-making. Moreover, empirical studies indicate that NGOs critical of the EU or confrontational in their approach may perceive or face challenges in accessing funding, although evidence shows cooperators and critics receive similar grants in many cases.

### **3 Transparency and Accountability in NGO Lobbying**

Since the 1990s, the European Commission has progressively developed an open and structured dialogue with special interest groups, a process that gained significant momentum following the publication of the White Paper on European Governance in 2001. Central to these procedures is the principle of transparency, which serves as the foundation for participatory policymaking within the EU. The establishment of the Transparency Register (ETR) ensures public visibility by disclosing which organizations are engaged in lobbying activities, the nature of their work, and the resources allocated to these efforts. Similarly, consultation mechanisms provide insight into stakeholder feedback and the Commission's responses, thereby enhancing accountability in the policy process. In addition, the Access to Documents regulation allows civil society organizations to request and obtain institutional documents within fifteen days, helping to mitigate informational asymmetries and strengthening the capacity of citizens and organized interests to hold EU institutions accountable. Together, these mechanisms contribute to a more open and participatory model of governance within the EU (Greenwood 2019).

The EU Transparency Register serves as a key mechanism aimed at increasing visibility over the interactions between interest representatives and EU institutions. It documents who engages in lobbying, the resources they allocate, and the policy areas they target, with the goal of enhancing openness and accountability in EU decision-making. However, despite its broad reach and

ambitious intent, the register continues to face significant challenges related to data reliability, enforcement capacity, and the unequal influence among different lobbying actors (EP Briefing 2023).

### **3.1 The EU Transparency Register: Scope and Limitations**

The concept and practice of lobbying within the EU has been increasingly politicized through the involvement of professionalized activist movements and NGOs. Their engagement has helped shape a more regulated and transparent lobbying environment, where organizations seeking to influence EU public policy are strongly encouraged to register in the official **Transparency Register**. This register, accompanied by a code of conduct, requires participants to disclose key information such as lobbying activities, clients (for consultancy firms), and expenditure, thereby promoting openness and accountability in interactions with EU institutions.

The Transparency Register, for example, requires organizations to declare their lobbying activities, clients, and spending. According to the Inter Institutional Agreement, the Register covers *“activities carried out with the objective of directly or indirectly influencing the formulation or implementation of policy and decision-making process of the EU institutions...irrespective of where they are undertaken and the channel or medium of communication used”* (Greenwood 2019).



According to official EU website: the EU Transparency Register serves as a comprehensive public database that records all interest representatives including organizations, associations, advocacy groups, and self-employed individuals engaged in activities intended to influence EU policymaking and decision-making processes. Its primary purpose is to enhance institutional transparency by providing clear information on which interests are being represented within the EU, by whom, on whose behalf, and with what resources. This includes the disclosure of financial details such as funding sources, donations, and sponsorships linked to lobbying activities. The register operates through several key mechanisms: a publicly accessible online platform where interest representatives are required to regularly update information about their lobbying activities; a code of conduct outlining ethical standards for interactions with EU institutions; and a complaints procedure that allows any stakeholder to initiate an administrative inquiry in cases of alleged breaches of the code. Together, these features aim to foster openness, accountability, and ethical conduct within the EU's lobbying ecosystem, while strengthening public trust in European governance.

In March 2020, the European Parliament's leadership reignited negotiations for a mandatory transparency register, appointing MEPs K. Barley and D. Hübner as lead negotiators. Following inter-institutional talks throughout the year, a final political agreement was reached on 15 December 2020. The European Parliament formally adopted the agreement on 27 April

2021, after its AFCD committee, with D. Hübner as rapporteur, endorsed the deal. The agreement was scheduled to enter into force in spring 2021 (EP 2025).

### **Operational Mechanisms of the Transparency Register**

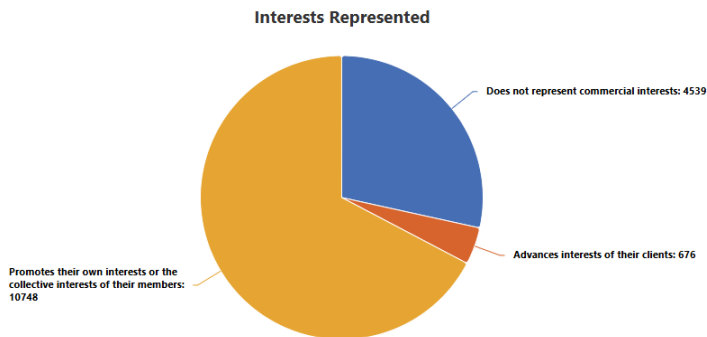
Upon registration, organizations agree to comply with the EU's Code of Conduct for lobbyists, which requires them to disclose the interests they represent, provide accurate information on their funding sources and lobbying expenditures, and adhere to ethical standards in dealings with EU officials. The Transparency Register covers the European Parliament, the European Commission, and the Council of the EU, functioning as a centralized platform for monitoring lobbying activities. Registered entities are obliged to update their information twice a year, with all declarations made publicly accessible. Moreover, the Register's Secretariat conducts regular verification processes, including quality checks and targeted reviews, to promote data reliability and ensure adherence to registration obligations (Brussels Watch 2025; EP Briefing 2023).

Currently, the EU Transparency Register includes a total of **16,019** organizations in 2025 (As of 22. October 2025). Non-governmental organizations, platforms, networks, and similar entities account for **4,310** out of the total **16,019** organizations listed in the EU Transparency Register (Transparency Register 2025). The number of registered organisations has been growing over the years. There were about 12,500 organisations in 2021 with about 50,000

staff, including non-governmental organisations, business associations, companies, trade unions and think tanks (EP 2021).

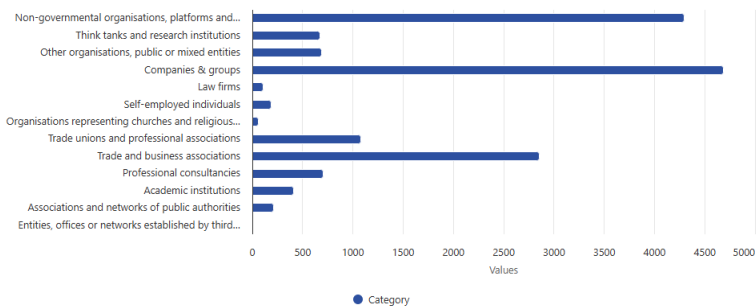
The charts below illustrate a comprehensive overview of all registered entities, as well as individuals accredited for access to the European Parliament’s premises, based on data obtained from the official **European Data Portal**.

**Figure 2 | Piechart – interest represented.**



Source: Transparency register, 2025.

**Figure 3 | Chart – categories of registrants.**



Transparency International's EU Integrity Watch further enhances public oversight by visualizing lobbying data.

EU funding for NGOs is contentious. Some NGOs, such as Amnesty International and Greenpeace, refuse EU funding to avoid perceptions of instrumentalization, while others see funding as enabling “associative democracy” and giving voice to marginalized groups. For instance, Friends of the Earth Europe received €1.5 million in EU funding in 2016 yet continued to criticize EU vigorously.

### **NGOs and Transparency Register Limitations**

The EU aspires to a pluralist interest group system, ensuring a diversity of voices in policy debates. The Transparency Register lists over 15,000 entities, including NGOs, business associations, and consultancies. However, the actual influence of different types of groups is debated.

Business interests often compete among themselves, with different sectors or even divisions within a single company holding divergent regulatory preferences. NGOs, by contrast, often form coalitions and share resources, enhancing their cohesion and influence. A key controversy is how to assess influence. Greenwood (2019) summarizes three main methods:

1. **Process tracing:** Uncovering the steps by which causes affect outcomes.
2. **Attributed influence:** Surveys of self-assessment or expert opinion.

3. **Preference attainment:** Comparing policy outcomes with stated preferences.

Empirical studies have found that **NGOs are more successful than business organisations** in getting **what they want from EU** public policy making, particularly where issues reach the status of high salience where they attract the attention of the European Parliament. Boräng and Naurin (2015) similarly found that *“civil society actors are more likely to share views with the Commission officials of what is at stake in legislation compared to business”*. However, the EU Transparency Register (ETR) has its limitations such as:

**1. Voluntary registration and limited coverage** – the register is still based on an inter-institutional agreement rather than a binding legislative act, meaning many organisations and interactions remain outside its scope. For example, only scheduled meetings with certain high-level officials are required to be declared; spontaneous meetings, phone calls or meetings with lower-level staff often are not (Apelblat 2024; Marinescu 2024).

According to official EU’s EP Briefing (2023) document: *“Some of the main criticisms focus on the inadequate monitoring of the data submitted to the register and the resulting potential inaccuracies. A recurring concern is that, despite being governed by the principle of conditionality, the register remains voluntary rather than mandatory. In the aftermath of the ‘Qatargate’ scandal, Corporate Europe Observatory advocated for the establishment of a*

*stronger, mandatory transparency register, while Transparency International highlighted the overall weak response from EU institutions, noting their failure to take concrete steps toward making registration compulsory”.*

**2. Weak enforcement, data quality and verification problems** – the Secretariat managing the register lacks sufficient resources and enforcement powers. Data audits reveal duplicate entries, incomplete or inconsistent financial disclosures, and a high degree of self-declaration without external verification. Auditors note that while ~1,000 registrants are removed yearly for administrative reasons, only very few are removed after investigations. J. K. Petrovič, the Slovenian ECA member who led the audit, said at a virtual press conference (16 April): “The EU transparency register must be bolstered so that it doesn’t turn into a paper tiger”. Petrovič was a member of the court of audit of Slovenia before he was appointed to ECA in 2022. (Apelblat 2024).

Auditors have raised concerns that lobbyists are only required to register when engaging with the most senior EU officials and that only pre-arranged meetings are disclosed. There is no obligation to document informal interactions, such as spontaneous meetings, unscheduled phone calls, or email exchanges, nor is registration required for meetings with officials below the director-general level who make up the majority of EU staff.

While efforts have been made to enhance transparency and expand registration, resulting in more published information on meetings with registered lobbyists, this data is not released

systematically. Furthermore, verification of the information provided by lobbyists remains insufficient. This is particularly problematic as some NGOs funded by third parties may obscure their financial backers by claiming to represent only their own or their members' collective interests a practice observed in about one-third of registered NGOs. Finally, the register's website has notable limitations, offering limited insight into key lobbying activities and lacking user-friendly features necessary for effective public oversight (ECA 2025a).

### **3. Loopholes in definitions and reporting requirements**

– the register does not define “lobbying” comprehensively, and different EU institutions apply the rules in varying ways. Thus, certain actors such as faith-based organisations, some Member State representations or third-country entities may avoid registration or disclosure. Also, organisations which claim they “represent their own interests” can bypass stricter funding/disclosure rules (Apelblat 2024; ECA 2025b).

**4. Transparency gaps in practice** – although the register is publicly accessible, key information is often missing (e.g., full list of lobby meetings, client lists for consultancies, historic data). The website user-interface and data usability have also been criticised as poor.

One of the key findings of the ECA highlights the absence of a comprehensive and reliable overview of EU funding allocated to NGOs. The relevant data are dispersed across various systems, websites, and databases, creating a fragmented and inconsistent

information landscape. This lack of integration undermines transparency and constrains the ability to evaluate the overall role of NGOs in EU policymaking and programme implementation. Furthermore, the absence of a centralized overview makes it difficult to determine whether EU financial resources are disproportionately concentrated among a limited number of NGOs, and to assess the extent to which such funding patterns are consistent with the Union's broader policy objectives (ECA 2025b). Drawing on public transparency standards established by international organisations such as the OECD, the IMF, and Transparency International – the European Court of Auditors (ECA) developed the infographic presented below.

**Figure 4 | Public transparency is about providing information for accountability**





#### **4 Towards Equitable and Transparent NGO Lobbying**

*“A range of lobbying interactions with EU lawmakers can be hidden from the public eye,”* – Jorg Kristijan Petrovic, ECA auditor (Euraciv 2024).

Over the past few decades, NGOs have gained unprecedented influence at both national and international levels. Surveys indicate that educated citizens in the United States and Europe tend to place greater trust in NGOs than in governments, corporations, or the media. Some scholars argue that the emergence of the nonprofit sector represents a development as significant to the late twentieth century as the rise of the nation-state was to the nineteenth.

However, as NGOs’ influence has expanded, so too has scrutiny of their legitimacy. While NGOs often criticize entities such as the United Nations and national governments for lacking transparency, democracy, and accountability, they now face similar accusations. Increasingly, critics contend that NGOs themselves operate through opaque and undemocratic processes, raising questions about their legitimacy as representatives of public interests (Lehr-Lehnardt 2005).

The Qatargate scandal and its aftermath have reignited public debate about the influence of lobbyists in their dealings with public authorities. Lobbying, while an essential component of modern democratic governance, providing policymakers with diverse perspectives and information to improve decision-making, also carries inherent risks.

As stated by Transparency International (2024) in their report *Lobby Transparency in The EU* – when left unchecked, it can result in legislation that disproportionately serves special interests, causes environmental or social harm, or, as the Brussels case demonstrated, devolves into outright corruption. The potential for undue influence whether from domestic or foreign actors poses an ongoing threat to the integrity of policymaking across the EU. As a result, robust regulation and enforcement are crucial to ensure transparency, uphold ethical standards, and protect public institutions. Against this backdrop, current discussions in Brussels and beyond focus on strengthening lobbying rules within the EU and its Member States, with an emphasis on adopting best practices to safeguard democratic governance from undue or malign influence (Kergueno 2024).

At the level of EU institutions, there is a significant risk that certain lobbying activities remain outside the scope of transparency, according to a report published in 2025 by the European Court of Auditors (ECA). The report notes that while the EU Transparency Register which provides information on who lobbies the Commission, Parliament, and Council has valuable features and informs citizens about potential lobbyist influence, it also contains gaps and limitations that reduce overall transparency within the three main EU institutions. Moreover, lobbyists can circumvent the register in various interactions, enabling them to continue influencing EU policymakers. Consequently, ECA auditors warn that without effective transparency mechanisms, lobbying

activities may result in undue influence, distorted competition, and even corruption (Marinescu 2024).

This chapter presents notable instances of lobbying and shortcomings in the Transparency Register identified by the ECA, while also outlining specific policy and governance reforms. These proposed measures aim to enhance transparency, diversify funding mechanisms, and guarantee fair access to EU policymaking, thereby reinforcing both democratic legitimacy and the inclusiveness of the lobbying process.

#### **4.1 NGO Lobby Still Slips Under the Radar**

*“Transparency is key to ensuring credible participation by NGOs in EU policymaking,” and “However, despite some progress since our last audit, the picture of EU funding for NGOs remains hazy, as information on EU funding – including lobbying – is neither reliable nor transparent.”* – Laima Andrikienė, the ECA Member in charge of the report (ECA 2025).

In October 2024, European Health Commissioner O. Várhelyi asserted that EU funding for the operational costs of NGOs, such as salaries and overheads, was “illegal,” a statement that surprised civil society actors who have long relied on such support under the EU4Health program. Historically, the program allocated operating grants to health-focused NGOs to cover day-to-day expenses, with **€9.3 million** designated for this purpose in 2024, until payments were recently suspended. Várhelyi reportedly justified the cessation of these grants as both a cost-saving measure

and a legal necessity, although Commission representatives later clarified that there is no explicit obligation under the Financial Regulation or the EU4Health Regulation to fund NGOs' core activities.

The withdrawal of operating grants has had immediate operational consequences, including staff reductions and the closure of some NGO offices in Brussels. Under the revised EU4Health work plan, NGOs are now eligible only for project-specific funding, with explicit restrictions prohibiting the use of EU funds for advocacy activities.

Várhelyi's remarks coincide with heightened scrutiny from conservative political actors across Europe, who have raised concerns that NGOs might use EU resources to lobby for stricter environmental and health regulations. This case underscores the growing tension between EU funding mechanisms, legal interpretations, and the operational autonomy of NGOs within the EU policy framework (O'Neill 2025).

### **NGOs Green Deal Lobby**

Recent scrutiny by conservative European lawmakers has raised concerns that the European Commission may be funding environmental NGOs to discreetly lobby in favor of the Green Deal, prompting debates about potential conflicts of interest and the legitimacy of EU grant allocation (Griera 2025).

According to recent reports, the European Commission allegedly provided substantial financial support up to **€700,000** to

major environmental NGOs, including Friends of the Earth and ClientEarth, to promote its climate agenda and, in some cases, to initiate legal action against German companies. The German outlet *Welt am Sonntag* claimed that ClientEarth received €350,000 to pursue litigation against German coal power plants, while Friends of the Earth was purportedly encouraged to mobilize opposition to the EU-Mercosur trade agreement. The report further suggested that other NGOs were funded to influence Members of the European Parliament ahead of key votes on environmental legislation (Szumski and Moller-Nielsen, Euractiv 2025).

Critics argue that Commission support could amount to political advocacy at taxpayers' expense, while NGOs and the Commission maintain that the funding is intended to foster open debate and independent advocacy, rather than to direct lobbying activities. An analysis of **28 contracts** under the **LIFE program** revealed that, although NGOs can receive up to €700,000 annually for operating grants and engage in advocacy and lobbying, there is no evidence that they are instructed to target specific MEPs or advance the Commission's political agenda. While some contracts include legal actions to promote environmental compliance, broader claims such as opposition to trade agreements or attacks on specific sectors were unsupported (Griera 2025).

These revelations have intensified criticism from conservative and right-wing political groups, particularly the European People's Party, which accuse the Commission of using public funds to advance its policy agenda. In response, the

Commission rejected allegations of secret or illicit funding, emphasizing its transparency in NGO financing and its recent issuance of stricter guidelines to prevent EU-funded work programs from including activities directly targeting EU institutions. Both ClientEarth and Friends of the Earth denied wrongdoing, asserting that their projects and deliverables were independently designed and that no EU funds were used for litigation or political campaigning (Szumski and Moller-Nielsen, Euractiv 2025).

Funding is awarded through publicly announced calls, assessed by EU agencies like CINEA, and beneficiaries are subject to audits, ensuring compliance with eligibility criteria, independence, and transparency. Overall, the evidence suggests that LIFE grants are designed to balance stakeholder representation in EU policymaking rather than to facilitate covert lobbying, although the optics of funding advocacy continue to provoke political debate (Griera 2025).

Even the **European People's Party** (EPP) Group announced that the European Commission has acknowledged instances where EU funds were improperly used to support lobbying activities by certain NGOs under the LIFE programme. While reaffirming its overall support for the LIFE initiative and the role of NGOs, the EPP highlighted cases of misconduct involving both Commission officials and NGO recipients.

The Commission's admission that some NGO work programmes included "specific advocacy actions and undue lobbying activities" was viewed by the EPP as a validation of its

longstanding concerns regarding the misuse of EU funds. In response, the Commission pledged to implement stronger safeguards, including prohibiting the use of grants for lobbying that targets specific policies or Members of the European Parliament, improving conflict-of-interest management among staff, and reviewing transparency mechanisms. EPP representatives, including P. Liese and S. Smit, welcomed these commitments as positive developments for safeguarding taxpayer money, institutional integrity, and fair competition among civil society organizations (EPP 2025).

The Taxpayers Association of Europe has filed a formal complaint with the European Public Prosecutor's Office (EPPO) against former EU Commissioners F. Timmermans and V. Sinkevičius, **key architects** of the **European Green Deal**, alleging the illegal funding of NGOs to conduct lobbying activities.

The complaint, also submitted to Munich's public prosecutor, follows unverified media reports claiming the European Commission channeled billions of euros to environmental NGOs to promote its green policy agenda. While the European Court of Auditors (ECA) previously criticized the Commission for insufficient oversight of NGO funding, it found no evidence of legal breaches.

Similarly, a *POLITICO* investigation into 28 NGO funding contracts found no indication that NGOs were explicitly paid to lobby EU institutions. Nonetheless, the case reflects escalating political tensions in Brussels, as conservative and right-wing groups

intensify scrutiny of NGO financing and advocacy roles, prompting the Commission to instruct NGOs to cease using EU operating grants for lobbying. The complaint underscores growing demands for transparency and legal accountability in the EU's funding of civil society organizations (Gros and Knapp 2025).

### **European Court Of Auditors Report**

Since its establishment, the EU Transparency Register has experienced significant growth, with registered lobbyists increasing from approximately 5,500 in 2012 to around 12,500 in 2024. Operated on a voluntary basis under a 2021 inter-institutional agreement, the register lacks binding legal force, and no sanctions can be imposed for non-compliance.

The ECA has highlighted limitations, noting that lobbyists are only required to register for meetings with senior staff and pre-scheduled interactions, while spontaneous meetings, phone calls, and emails are excluded, and most staff below the director-general level are not covered. Moreover, verification of declared information remains insufficient, raising concerns that third-party-funded NGOs may not fully disclose their financial sources; indeed, one-third of registered NGOs did not report their funding. While EU institutions have sought to improve transparency and encourage registration, publication of lobbyist activities remains inconsistent. In response, the European Commission, Council, and Parliament have argued that recording all meetings, including unscheduled



interactions, is impractical, highlighting ongoing challenges in ensuring comprehensive lobbying transparency (Marinescu 2024).

In 2024, the ECA has warned that the EU Transparency Register risks becoming “a paper tiger” unless its scope and enforcement are significantly strengthened. The audit, led by ECA auditor J. K. Petrovic, identified major loopholes, including the requirement to register only pre-scheduled meetings with high-ranking staff and the lack of formal records for spontaneous meetings, phone calls, or emails.

The 2024 report also noted that funding sources for over **one-third of registered NGOs remain unclear**. With roughly 12,500 organizations listed, watchdogs estimate that up to **29,000 lobbyists** are active in Brussels, highlighting the disproportionate influence of well-resourced actors such as Big Tech, which spent €113 million on EU lobbying in 2023 alone. In response, new EU ethics rules are expected to introduce standards covering gifts, hospitality, financial interests, post-office activities, and interactions with lobbyists, reflecting growing concerns about the potential for undue influence in EU policymaking (Euractiv 2024).

Between 2021 and 2023, NGOs received approximately **€7.4 billion** in EU funding for key internal policies such as cohesion, research, migration, and the environment €4.8 billion from the European Commission and €2.6 billion from member states.

However, the ECA cautioned that these figures **lack reliability due to fragmented and inconsistent reporting**, which **undermines transparency** and obscures whether EU funds are

concentrated among a small group of NGOs. Despite some progress in data collection, weaknesses persist in how the Commission and member states disclose and monitor NGO funding.

The **absence** of a **harmonized definition** of “NGO” across the EU further complicates oversight, as entities self-declare their status without verification of independence or non-commercial activity, leading to misclassification in several cases. The Commission also failed to clearly report on NGO advocacy activities financed by EU grants and only recently issued guidance to prevent funding being used for lobbying EU institutions. Moreover, checks on compliance with EU values and transparency of funding sources remain limited, relying mainly on self-declarations. Over 12,000 NGOs were funded during the audit period, yet a large share of funding was concentrated among a few major organizations.

The ECA’s 2025 *Special Report “Transparency of EU Funding Granted to NGOs”* concludes that despite improvements, the overall system still **lacks a reliable and comprehensive overview of NGO funding**, constraining accountability and public trust in EU financial governance (ECA 2025). In Special Report 11/2025 – Transparency of EU funding granted to NGOs are presented the **main findings of the ECA**:

- **Incomplete and inaccurate funding data:** Information on EU financial support provided to NGOs is still fragmented, inconsistent, and lacks full accuracy.

- **Weak identification and registration systems:** The classification and registration of NGOs are applied inconsistently, making the data unreliable.
- **Lack of transparency in advocacy funding:** EU-funded NGO activities related to lobbying and advocacy are not systematically or clearly disclosed.
- **Insufficient verification of EU values compliance:** The Commission does not proactively ensure that funded NGOs uphold EU principles such as democracy, rule of law, and human rights.
- **Overall lack of transparency:** EU funding granted to NGOs under internal policy programs remains inadequately transparent, limiting oversight and public accountability.

**Figure 5 | 2025 Special Report “Transparency of EU Funding Granted to NGOs**



Source: ECA, 2025.

## **4.2 Policy Recommendations for Reform**

An audit report by the ECA highlights that lobbying activities targeting EU lawmakers can still evade scrutiny, revealing persistent gaps in transparency despite the existence of the EU Transparency Register (EUTR). Managed by a secretariat on behalf of the European Commission, the European Parliament, and the Council, the register provides information on who is lobbying these institutions and is recognized as a key tool for promoting input into policy and decision-making, supporting democratic processes.

Nevertheless, the ECA notes that in the absence of robust transparency mechanisms, lobbying can facilitate undue influence, distort competition, and even foster corruption, as the register alone does not fully inform citizens of lobbyists' potential negative impact. While the three institutions formalized their commitment to the register through a 2021 interinstitutional agreement, including the principle of conditionality making registration a prerequisite for certain lobbying activities the audit reveals that discrepancies remain in how the agreement is implemented. Variations persist regarding which lobbying activities require registration and how lobbyists may engage with members and staff, reflecting uneven application despite a centralized secretariat.

The below proposed reforms should transform the EU Transparency Register from a declarative database into an active governance tool that ensures equitable access to policymaking, and reinforces public trust in EU institutions:

**1. Enhance Investigative Capacity and Oversight**

- Strengthen the Secretariat's mandate to proactively verify the accuracy of lobbying claims and financial disclosures.
- Equip it with greater investigative powers to audit funding sources and cross-check declared activities with external data.

**2. Broaden the Definition and Scope of Interest Representation**

- Adopt an EU-wide legal definition of *interest representation* encompassing all actors – corporate, NGO, legal, and consultancy engaged in influencing policymaking, regardless of their legal or financial form.
- Expand the classification of affiliates to capture all related entities and activities, closing loopholes that allow fragmented operations to evade disclosure.

**3. Mandate Harmonised and Publicly Accessible Registers**

- Establish interconnected national and EU-level transparency registers with harmonised data standards and unique identifiers for organisations active across Member States.
- Ensure all data are available in open, machine-readable formats to facilitate public scrutiny and research.

#### **4. Strengthen Compliance and Enforcement Mechanisms**

- Introduce enforceable *Codes of Conduct* grounded in ethics and integrity standards applicable to all lobbyists and intermediaries.
- Enforce clear penalties for misinformation, non-registration, or failure to comply with transparency obligations.
- Increase the Secretariat's capacity to follow up on suspicious entries and sanction non-compliant entities.

#### **5. Improve Interinstitutional and Oversight Cooperation**

- Enhance collaboration between the Transparency Register Secretariat, the European Court of Auditors (ECA), and other EU oversight bodies to ensure consistent monitoring and evaluation.
- Create joint reporting mechanisms to track and publish findings on lobbying transparency and integrity.

#### **6. Guarantee Public Accountability and Open Access**

- Mandate the proactive publication of all interactions between decision-makers and registered interest representatives including meetings, communications, and consultations in accessible online databases.
- Empower journalists, researchers, and civil society organisations with open access to lobbying data to strengthen democratic accountability.

## 7. Promote Transparency Culture Across EU Institutions

- Require training for EU officials on ethical engagement with lobbyists and the proper use of the register.
- Embed transparency and integrity standards into institutional practices and evaluation frameworks (Brussels Watch 2025; Transparency International 2024; ECA 2025b).

The new rules should be introduced for Members of the European Parliament (MEPs). MEPs should engage exclusively with lobbyists who are **officially registered**. Lobbying activities must be subject to **rigorous monitoring** and **comprehensive due diligence**, particularly regarding the mandatory disclosure of meetings a requirement that many MEPs still fail to meet, with nearly one hundred having not published any meetings to date. In cases of non-compliance, sanctions should be effective and dissuasive, as the existing system limited to mild measures such as reprimands is inadequate.

Furthermore, the current rules only oblige Members to disclose scheduled meetings with lobbyists, which leaves a significant transparency gap since many interactions occur informally. To address this, Parliament should amend its rules to require the publication of **all meetings with lobbyists**, regardless of whether they are formal or informal (Engelbrecht-Bogdanov 2025).

In January 2022, the European Commission introduced an official definition of a NGO through an update to its public guidelines on the legal validation of entities eligible for EU funding or tenders under both direct and indirect management. According to this definition, NGOs must operate on a non-profit basis and maintain independence from governmental control. However, the criteria used by various Commission departments and agencies in their calls for operating grant proposals have not been applied consistently. Consequently, an organisation recognised as an NGO in one funding call might be deemed ineligible under another, reflecting a lack of uniformity in implementation.

In response to persistent shortcomings in transparency and consistency, the ECA issued a set of targeted recommendations aimed at strengthening the management and oversight of EU funding granted to NGOs. First, the ECA urged the European Commission to **improve guidance on classifying NGOs** by ensuring a uniform understanding and application of the NGO definition across all management modes. This includes clarifying the criteria for “independence from government” beyond the basic requirement of being a private entity, and specifying how NGO status applies when an organisation pursues its members’ commercial interests, with implementation expected by 2025.

Second, the ECA recommended **enhancing the quality of information on EU spending** within the Financial Transparency System by improving its completeness, timeliness, and comparability specifically through more frequent updates and



inclusion of second-level funding recipients under both direct and indirect management. This measure is to be implemented by 2029.

Finally, the ECA called for **strengthened verification of compliance with EU values**, encouraging the Commission to develop risk-based mechanisms to assess whether recipients, including NGOs, adhere to fundamental EU principles and to detect possible breaches. The implementation of this recommendation is targeted for 2028 (ECA 2025b).

On 20 October 2025, the ECA will convene a conference dedicated to the theme of transparency within the EU's governance framework. Building upon its recent audit reports concerning the transparency of EU funding allocated to NGOs and the operation of the EU Transparency Register for lobbyists engaged in influencing policymaking, the event seeks to address the persistent challenges and potential avenues for improvement in promoting openness and accountability. The conference will serve as a platform for dialogue among senior representatives of EU institutions, policy experts, civil society actors, and other key stakeholders, fostering an exchange of insights and policy recommendations aimed at strengthening transparency and integrity in EU policymaking and financial management (ECA 2025c).

The revised regulatory framework governing European political parties and foundations seeks to enhance democratic safeguards and promote greater transparency and accountability within the EU's political system. These reforms aim to address persistent deficiencies in governance, funding oversight, and

institutional integrity, thereby strengthening resilience against external interference and ensuring closer alignment with the Union's fundamental values.

To qualify for official recognition and financial support, European political parties and foundations must now declare that their member organizations both within and outside the EU adhere to the principles enshrined in Article 2 of the TEU. This declaration will be subject to review whenever membership changes occur. Furthermore, parties and foundations are required to adopt internal measures fostering gender equality, implement anti-harassment policies, and produce annual reports detailing progress on representation and inclusion.

The reforms also introduce stricter transparency standards, mandating that all donations exceeding **€3,000** be fully traceable to **identifiable donors** and **publicly disclosed** in a unified online registry administered by the newly strengthened Authority for European Political Parties and European Political Foundations (APPF). In addition, to counter foreign interference, member organisations from candidate or neighbouring countries may continue to engage in European-level political cooperation but are prohibited from voting to secure majorities or paying membership fees ensuring inclusivity without compromising democratic integrity.

Financially, the framework simplifies funding rules by standardising the EU co-financing rate at 95% and permitting limited self-generated income through activities such as events and

publications, capped at 3% for parties and 5% for foundations. Finally, while maintaining the prohibition on direct or indirect funding of national parties and candidates, the new regulations clarify permissible forms of cooperation between European political parties and their affiliates, allowing for joint initiatives that enhance political dialogue while preserving transparency and accountability (News European Parliament 2025).

The proposed reform package for European political parties is currently pending formal approval by both the European Parliament and the Council. Its principal measures including real-time donor transparency requirements and revised co-financing provisions are expected to take effect on **1 January 2026**.

In parallel, the structure and mandate of the forthcoming oversight mechanism for NGOs have yet to be fully delineated. As reported by *Euronews*, this oversight body will operate within the European Parliament's Committee on Budgetary Control (CONT) and will focus on examining the EC's financial support for NGOs. The working group will comprise thirteen MEPs and will be chaired by German MEP N.s Herbst, with two co-rapporteurs representing the centre-right European People's Party (EPP) and the right-wing European Conservatives and Reformists (ECR).

At the same time, civil society organisations and progressive political actors are mobilising to ensure that the establishment and operation of this new oversight body adhere to the core principles of democracy, transparency, due process, and fairness in institutional scrutiny (Genovese 2025).

## CONCLUSION

This research paper has demonstrated that NGOs have become pivotal actors in the EU's policymaking landscape, serving as intermediaries between civil society and EU institutions. Their roles encompass lobbying, advocacy, expert consultation, and mobilization of public opinion, all of which contribute to enhancing democratic legitimacy and pluralism within EU governance. However, the study also reveals persistent challenges: the phenomenon of "elite capture" by large, well-resourced NGOs, funding dependencies that may compromise autonomy, and ongoing questions about transparency and accountability. Recent regulatory reforms and heightened scrutiny such as the establishment of new oversight bodies reflect a critical juncture for both NGOs and the broader democratic architecture of the EU.

Theoretically, the findings advance our understanding of NGOs as both agents of democratization and as actors embedded in complex power structures. The research highlights the paradox of elite capture, where NGOs intended to democratize policymaking may inadvertently reproduce hierarchical and exclusionary patterns. Practically, the study underscores the need for robust transparency mechanisms, equitable funding distribution, and institutional reforms that balance the benefits of NGO participation with safeguards against undue influence. The evolving regulatory environment particularly the introduction of real-time donor transparency and revised co-financing rules signals a shift toward

greater accountability but also introduces new operational uncertainties for civil society.

From a broader theoretical and policy standpoint, the EU's engagement with civil society has historically functioned as a cornerstone of participatory democracy, as enshrined in Articles 9 and 10(3) of the TEU. Programmes such as LIFE have been instrumental in enabling NGOs to mobilise citizens, stimulate public deliberation, and counterbalance corporate interests in the policymaking process. However, critics contend that the European Commission's financial support for NGOs may effectively constitute political advocacy funded by taxpayers. The European Court of Auditors (ECA) determined that, despite notable progress, the transparency of EU funding allocated to NGOs remains constrained by inconsistencies in NGO classification and deficiencies in data quality. The audit further revealed that the European Commission and other relevant institutions do not systematically or proactively verify the compliance of funding recipients with EU fundamental values.

Moreover, the ECA identified instances where certain advocacy activities were financed by the Commission without sufficient transparency. Consequently, the ECA recommends that the Commission establish a consistent framework for classifying NGOs, enhance the accuracy and completeness of EU expenditure data, and implement more mechanisms for verifying adherence to EU values.

On the other hand, the recent decision to restrict advocacy-related funding therefore marks a profound policy departure that

may significantly impair NGOs' capacity to contest industrial lobbying and to advance environmental and social objectives particularly at a time when the European Green Deal is encountering mounting political opposition. This shift, when considered alongside forthcoming deregulatory initiatives under the Competitiveness Compass, has generated substantial criticism and could be subject to judicial review before the EU Courts.

More broadly, the evolving prominence and influence of NGOs within both international and EU governance frameworks necessitate higher standards of internal democracy, representativeness, and accountability. As former UN Secretary-General Boutros Boutros-Ghali once underscored, NGOs have a vital role in fostering peace, development, and democratization through their capacity for assistance, mobilisation, and civic engagement. To sustain their legitimacy and effectiveness in shaping policy and norms, NGOs must therefore adapt to the increasing expectations associated with their expanding political and normative influence (Lehr-Lehnardt 2005).

This work contributes to EU governance studies by offering a nuanced analysis of the dual role of NGOs: as promoters of democratic participation and as actors constrained by structural inequalities. In addition to that, Auditors warn about risk of NGOs funding sources remaining opaque. It situates NGO lobbying within the broader context of EU multi-level governance, drawing attention to the interplay between advocacy, institutional influence, and accountability. By integrating empirical evidence with theoretical

perspectives, the research provides a critical assessment of how NGOs shape, and are shaped by, the EU's policymaking processes. The study also foregrounds the importance of transparency registers, oversight mechanisms, and the contested legitimacy of interest representation in supranational governance.

Future research should further explore the impact of new regulatory frameworks on NGO operations, particularly regarding transparency, funding, and advocacy restrictions. Comparative studies across different policy sectors and EU member states could illuminate variations in NGO influence and effectiveness. Additionally, there is a need for deeper investigation into the experiences of smaller, grassroots organizations and their strategies for overcoming resource asymmetries. Finally, as digital governance and transnational advocacy evolve, research should examine how NGOs adapt to new forms of participation and scrutiny within the EU's changing institutional landscape.

NGOs are indispensable yet imperfect intermediaries in EU governance. While they enhance democratic legitimacy and pluralism, their effectiveness is constrained by structural inequalities, funding dependencies, and the risk of elite capture. Ongoing reforms seek to address these challenges by promoting greater transparency, accountability, and inclusivity in EU policymaking.

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