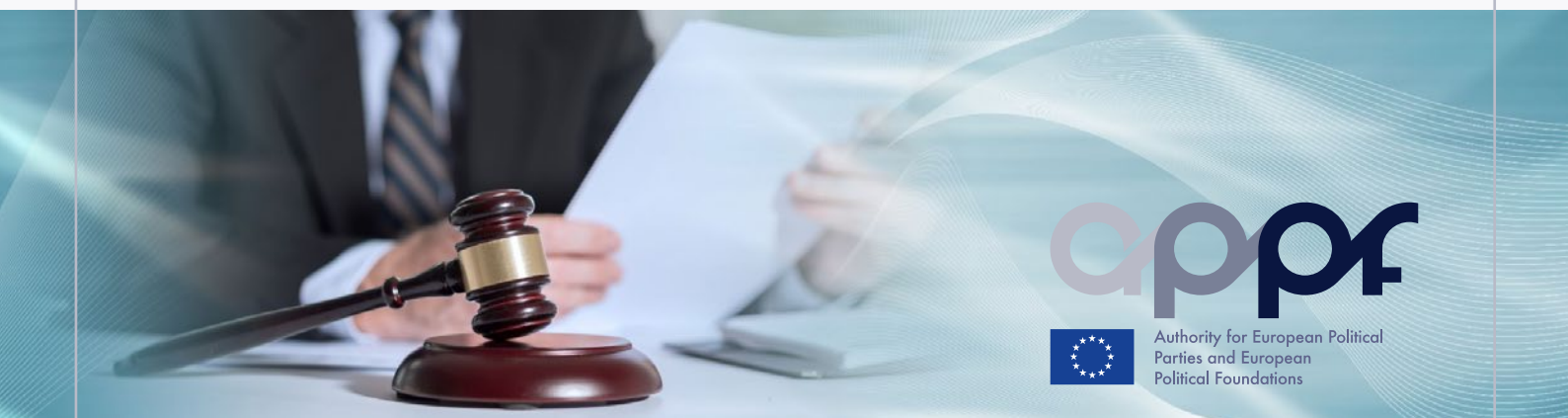


ANNUAL ACTIVITY REPORT

2020



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Parties and European
Political Foundations

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Luxembourg: Publications Office of the European Union, 2021

PDF ISBN 978-92-95216-06-8 ISSN 2599-6258 doi:10.2882/508629 HK-AA-21-001-EN-N

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2020

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ABBREVIATIONS

Amending Letter to the 2019 Draft General Budget	Amending Letter No 1 to the Draft General Budget 2019 of 16 October 2018
Amending Regulation (EU, Euratom) 2018/673	Regulation (EU, Euratom) 2018/673 of the European Parliament and of the Council of 3 May 2018 amending Regulation (EU, Euratom) No 1141/2014 on the statute and funding of European political parties and European political foundations
Amending Regulation (EU, Euratom) 2019/493	Regulation (EU, Euratom) 2019/493 of the European Parliament and of the Council of 25 March 2019 amending Regulation (EU, Euratom) No 1141/2014 as regards a verification procedure related to infringements of rules on the protection of personal data in the context of elections to the European Parliament
Authority	Authority for European Political Parties and European Political Foundations
Delegated Regulation (EU, Euratom) 2015/2401	Commission Delegated Regulation (EU, Euratom) 2015/2401 of 2 October 2015 on the content and functioning of the Register of European political parties and foundations
EU	European Union
EU foundation	European political foundation
EU funding	Public funding from the general budget of the European Union
EU party	European political party
financial regulation	Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012
MEP	Member of the European Parliament
Regulation (EC) No 2004/2003	Regulation (EC) No 2004/2003 of the European Parliament and of the Council of 4 November 2003 on the regulations governing political parties at European level and the rules regarding their funding
Regulation (EU, Euratom) No 1141/2014	Regulation (EU, Euratom) No 1141/2014 of the European Parliament and of the Council of 22 October 2014 on the statute and funding of European political parties and European political foundations
Union funding	Public funding from the general budget of the European Union

1. FOREWORD

After a more than extraordinary year, I am proud to present the *2020 Annual Activity Report* of the Authority for European Political Parties and European Political Foundations.

The year 2020 brought about exceptional challenges for European political parties and European political foundations as well as for the Authority. The measures put in place to deal with the COVID-19 pandemic severely restricted activities and work streams that were based on physical presence, and required unprecedented flexibility and commitment in order to ensure business continuity.

I would like to thank all of the Authority's staff for the resilience shown in that extraordinary situation.

This report guides the reader through the Authority's main activities during 2020, from registration of EU parties and EU foundations to financial supervision of these entities. It also provides broader insights regarding the role of EU parties in the wider European political arena, including during the European elections.

Finally, I would like to thank all colleagues from various EU institutions and bodies, as well as the Member States, who continue to interact with the Authority on a daily basis and thus support its activities and its mission.



Michael ADAM

2. INTRODUCTION

This report aims to describe and explain the tasks discharged and challenges encountered by the Authority throughout 2020.

The following sections try to dissect the different work streams handled by the Authority, setting out the main features of each of them. Given the complexity of the issues involved, it is appropriate to start with an overview of Regulation (EU, Euratom) No 1141/2014. This will provide readers, particularly those who are not familiar with the details of the regime applicable to EU parties and EU foundations, with the necessary background to understand the sections devoted to the Authority's activities. Following that, the report will describe operations, focusing – for the sake of simplicity – on three main areas: (i) registration and verification, (ii) financial supervision and (iii) European elections. A fourth section will set out the operations that do not fall in the first three categories. A further section will discuss the Authority's administrative set-up, before the report concludes.

With that plan in mind, the Authority hopes that readers will find this report insightful and useful for obtaining a deeper understanding of an evolving system of rules that is inseparably connected to the functioning of European democracy.

3. REGULATION (EU, EURATOM) NO 1141/2014

Through Regulation (EU, Euratom) No 1141/2014, the European legislature set up a new legal framework aimed at ensuring that EU parties and EU foundations form a strong link between European civil society and the EU's institutions. That legal framework is an expression of the principle contained in Article 10(4) of the Treaty on European Union and Article 12(2) of the Charter of Fundamental Rights of the European Union, that is, political parties at EU level contribute to forming European political awareness and to expressing the political will of citizens of the EU.

Regulation (EU, Euratom) No 1141/2014 builds on the past experience of the European Parliament and other stakeholders and introduces a new series of rights and obligations for EU parties and EU foundations. Following a comprehensive registration process, they can apply for EU funding and obtain a fully fledged European legal personality. At the same time, they must respect a number of rules and norms of conduct, including the treatment of donations and contributions, and observe the values upon which the EU is founded.

3.1. The Authority

Regulation (EU, Euratom) No 1141/2014 established the Authority as an independent body. The Authority assesses applications for registration and makes decisions on the registration of new EU parties and EU foundations or the deregistration of existing ones. The Authority is also tasked with monitoring financial transfers originating from members and donors, enforcing restrictions regarding the use of funding, and imposing sanctions where an EU party or EU foundation fails to respect its obligations.

The Authority was formally established on 1 September 2016 and began fully operating on 1 January 2017. The Authority is represented by its Director, who makes all decisions on its behalf. Mr Michael Adam was appointed as the first Director of the Authority by Decision (EU, Euratom) 2016/1432 of the European Parliament, the Council and the Commission of 19 August 2016. Mr Adam took up his duties on 1 September 2016 and holds a 5-year mandate.

3.2. Reform process to date

Despite its young age, Regulation (EU, Euratom) No 1141/2014 underwent a number of targeted reforms throughout 2018 and 2019. It is useful to outline briefly the main features of these reforms, before discussing their actual and potential consequences in more detail in the following sections.

In May 2018, the European Parliament and the Council adopted Amending Regulation (EU, Euratom) 2018/673. Among other things, this amendment tightened the conditions for registration as an EU party and led the Authority to deregister two EU parties and one EU foundation. The amendment also refined the regulatory powers conferred on the Authority and modified the notion of national contact points, that is, the entities designated at national level to exchange information in the context of the application of Regulation (EU, Euratom) No 1141/2014 (see [Section 2](#) of the appendix).

In March 2019, the European Parliament and the Council adopted Amending Regulation (EU, Euratom) 2019/493. This second amendment introduced a verification procedure aiming to impose sanctions on EU parties or EU foundations that deliberately influence, or attempt to influence, the outcome of European elections by taking advantage of data protection breaches. It also granted the Authority additional resources and enhanced its independence.

Pursuant to Article 38 of Regulation (EU, Euratom) No 1141/2014, an evaluation of the current legislative text is also scheduled to take place in 2021. In particular, the European Parliament is called on to publish by 31 December 2021, and after consulting the Authority, a report on the application of Regulation (EU, Euratom) No 1141/2014 and the activities funded through that instrument. No more than 6 months after the publication of that report, the Commission will present a follow-up report, which may be accompanied by a legislative proposal to amend Regulation (EU, Euratom) No 1141/2014.

Against that background, the Commission has already announced, in its communication of 3 December 2020 on the European democracy action plan (COM(2020) 790 final), to make such a legislative proposal amending the legislation on the funding of European political parties with a view to addressing the financing of European political parties from outside the EU, revising the audit requirements, strengthening the links between European financing and national campaigns, and facilitating transparency and auditing. The goal is to have the new rules in place in sufficient time ahead of the May 2024 European Parliament elections.

The Authority is contributing to the legislative process by providing advice on technical points, participating in meetings with the EU institutions and proposing improvements to ensure consistency with other provisions of Regulation (EU, Euratom) No 1141/2014.



4. REGISTRATION AND VERIFICATION

Registration as an EU party or EU foundation is the process whereby the Authority acts as a gatekeeper and decides whether or not applicants fulfil the conditions and requirements to become an EU party or EU foundation. Registration grants two main benefits. First, EU parties and EU foundations are entitled to apply to obtain EU funding from the European Parliament. Second, EU parties and EU foundations acquire a fully fledged European legal personality through which they enjoy legal recognition and capacity in all Member States. Those benefits are, however, counterbalanced by the obligations laid down in Regulation (EU, Euratom) No 1141/2014. For example, EU parties and EU foundations are subject to extensive transparency requirements, cannot accept certain types of payments, particularly from outside the EU, and must respect the values upon which the EU is founded.

4.1. Administrative process

In assessing applications, the Authority applies the substantive and formal conditions laid down in Regulation (EU, Euratom) No 1141/2014 and Delegated Regulation (EU, Euratom) 2015/2401. Among other applicable criteria, the Authority must examine whether an applicant fulfils the minimum representation requirements laid down in point (b) of Article 3(1) of Regulation (EU, Euratom) No 1141/2014. Simply put, the Authority must check if the application is supported by national or regional political parties that are represented by Members of the European Parliament (MEPs), or of national or regional parliaments, in at least seven Member States. Alternatively, an applicant may prove that its member parties received at least 3 % of the votes cast at the most recent elections to the European Parliament in seven Member States.

Following the adoption of a registration decision, the Authority notifies the applicant and then publishes the registration decision on its website. The documents submitted as part of the application file are also published on the Authority's website, as required by Regulation (EU, Euratom) No 1141/2014. Registration decisions are then translated into all official EU languages and published in the *Official Journal of the European Union*.

Regulation (EU, Euratom) No 1141/2014 also mandates that the Authority, in addition to its website, establish and manage a register containing a set of information about all registered EU parties and EU foundations. After registration, the Authority regularly interacts with EU parties and EU foundations to keep their application files up to date on its website and in the register. Regulation (EU, Euratom) No 1141/2014 requires that EU parties and EU foundations notify the Authority of any amendments to the documents submitted as part of their applications for registration. In addition, EU parties must file an updated list of member parties at least once a year. This process ensures that the Authority is able to verify that EU parties and EU foundations continue to comply with the registration conditions and provide citizens with up-to-date information.

4.2. Tightening of registration requirements

The original text of Regulation (EU, Euratom) No 1141/2014 allowed single parliamentarians to support an application for registration, even in the absence of a political party at national or regional level. In other words, seven parliamentarians from seven Member States – acting on an individual basis – were deemed sufficient to satisfy the minimum representation requirements. In May 2018, the European legislature adopted Amending Regulation (EU, Euratom) 2018/673. This amendment tightened the minimum representation requirements, rendering registration contingent upon an applicant being supported by seven political parties in seven Member States. Therefore, unlike in the past, single parliamentarians could no longer support an application for registration on an individual basis.

The reform not only applied to new applicants but also extended to pre-existing EU parties. As a result of this, in 2018 the Authority deregistered two EU parties, Alliance of European National Movements and Alliance for Peace and Freedom, because they did not provide proof that they satisfied the tightened minimum representation requirements. As a consequence, Europa Terra Nostra, the EU foundation affiliated with Alliance for Peace and Freedom, was also deregistered. Removal from the register terminates the European legal personality of EU parties and EU foundations and renders them ineligible for EU funding.

4.3. Regular verification

The implementation of Amending Regulation (EU, Euratom) 2018/673 resulted in the following status quo in 2020: 10 EU parties and 10 EU foundations. Registered EU parties are listed in Section 1 of the appendix in order of registration, along with their respective EU foundations.

The Authority carried out two verification exercises in 2020 to assess if EU parties still fulfilled the minimum representation requirements: (i) first, following the end of the mandate of MEPs from the United Kingdom caused by Brexit and, (ii) second, before the funding was awarded to EU parties and EU foundations for 2021. The results of the work stream listed under (ii) above are shown in Section 1 of the appendix, and demonstrate that all 10 EU parties were supported by member parties represented in the European Parliament, or in national or regional parliaments, in at least seven Member States. In addition to those two general verification exercises, the Authority performs regular verifications of minimum representation requirements where the individual case requires it, for example following national (and/or regional) elections taking place in Member States that are relevant to compliance with the minimum representation criterion.

4.4. New applications for registration in 2020

In 2020, the Authority received two new applications to be registered as European political parties. The applications were filed by the following entities: (i) European Alliance for Freedom and Democracy ASBL and (ii) Alliance for Peace and Freedom ASBL. The Authority scrutinised both applications and came to the conclusion that neither applicant fulfilled the minimum requirements to be registered as a European political party.

The Authority therefore, on 2 September 2020, adopted a decision rejecting the application submitted by European Alliance for Freedom and Democracy ASBL. On 26 November 2020, the Authority adopted a decision rejecting the application submitted by Alliance for Peace and Freedom ASBL.

Both applications were published on the Authority's website. Both decisions of the Authority were published in the *Official Journal of the European Union* as well as on the Authority's website. As a consequence, neither of the applicants was in a position to apply for EU funding.

Dealing with the two applications at a time when all of the Authority's staff were entirely taken up with analysing the very extensive financial submissions of all existing EU parties and EU foundations in the context of the review of their annual accounts for budget year 2019 constituted a major additional work stream and put the Authority's resources under significant strain.



5. REVIEW OF ACCOUNTS

Regulation (EU, Euratom) No 1141/2014 prescribes that EU parties and EU foundations submit annually a set of documents detailing their finances. That documentation must be submitted to three actors: (i) the Authority, (ii) the European Parliament and (iii) the national contact point of the Member State in which the party or foundation has its seat. Pursuant to Article 23 of Regulation (EU, Euratom) No 1141/2014, EU parties and EU foundations have until June of each year to produce the documentation regarding the previous financial year. This means that the review starts in the second part of the year following the year under scrutiny.

In 2020, the Authority was reviewing the documentation relating to the 2019 financial year.

It was the second time the Authority had engaged in that work stream, because Regulation (EC) No 2004/2003, the predecessor of Regulation (EU, Euratom) No 1141/2014, applied to the 2017 financial year, and therefore the review of that financial year was still carried out by the European Parliament. It is worth noting, however, that today the European Parliament still remains a very important participant in the review from a different

angle. Regulation (EU, Euratom) No 1141/2014 provides for a strict division of labour between the European Parliament and the Authority. On the one hand, the European Parliament ensures compliance with the obligations relating to EU funding in accordance with Regulation (EU, Euratom) 2018/1046 (the financial regulation). On the other hand, the Authority is tasked with assessing the compliance of EU parties and EU foundations with obligations regarding the origin and use of their funding (private and public).

5.1. Financial obligations

To fully grasp the review process, and the challenges encountered by the Authority in 2020, it is useful to first set out the types of obligations that Regulation (EU, Euratom) No 1141/2014 imposes on EU parties and EU foundations. Those obligations concern both income and expenditure and refer to three main financial areas: (i) contributions, (ii) donations and (iii) use of funding. An explanation of the scope and content of the obligations in each area is given below.

Table 1: Summary of obligations

	Origin	Ceiling	Thresholds	Reporting	Publication
Contributions	Members	40 % of annual budget	NO threshold for legal persons EUR 18 000 per year per natural person, unless parliamentarian	ALL contributions by 30 June of year N + 1	Contributions from member parties OR member organisations NO for natural persons
Donations	Third parties (non-members)	NO	EUR 18 000 per year per donor	ALL donations by 30 June of year N + 1 Immediately for donations above EUR 12 000 On a weekly basis 6 months prior to European elections	ALL donations, subject to safeguards for natural persons' personal data ('minor donations')

Pursuant to Regulation (EU, Euratom) No 1141/2014, the notion of contribution refers in essence to any payment, in whatever form, originating from members. The notion of contribution is broadly worded and includes not only the payment of membership fees but also the provision of goods or services below market value and any other transaction bringing an economic advantage. Regulation (EU, Euratom) No 1141/2014 prescribes an overall ceiling applicable to the total amount of contributions received by EU parties and EU foundations on a yearly basis. That total amount cannot exceed 40 % of the annual budget of the EU party or EU foundation concerned. In addition, single contributions from EU citizens cannot exceed EUR 18 000 per year per natural person, unless those EU citizens are parliamentarians. In complete contrast, contributions from legal persons, namely member parties for EU parties and member organisations for EU foundations, are not subject to any specific threshold. Every year EU parties and EU foundations must submit to the Authority data regarding contributions. Following verification, contributions from member parties and member organisations are published on the Authority's website.

The notion of donation is also broadly worded and captures any payment, in whatever form, originating from third parties, that is, non-members. Once again, the notion includes the provision of goods or services below market value and any other transaction bringing an economic advantage. The framework applicable to donations is more detailed and somewhat the opposite of that for contributions. This is because there is no overall ceiling applicable to the total amount of donations in a given financial year. There is instead a small body of donation-specific rules, which can be summarised as follows.

- ▶ EU parties and EU foundations can accept donations from natural or legal persons up to a value of EUR 18 000 per year per donor.
- ▶ EU parties and EU foundations must immediately report donations exceeding EUR 12 000 throughout the financial year.
- ▶ EU parties and EU foundations must report, on a weekly basis, all donations received within 6 months prior to European elections.

- ▶ EU parties and EU foundations cannot accept certain types of donations such as anonymous donations, donations from outside the EU and donations from public authorities.

Donations are published on the Authority's website in a disaggregated manner, save for certain safeguards applicable to minor donations to protect donors' personal data.

With regard to the expenditure side, the single most important provision is contained in Article 22 of Regulation (EU, Euratom) No 1141/2014, namely the prohibition of funding. According to that provision, EU parties cannot fund, directly or indirectly, other political parties, and in particular national parties or candidates. Similarly, EU foundations cannot fund, directly or indirectly, elections, political parties or candidates, or other foundations. In addition, EU parties and EU foundations cannot finance referendum campaigns. The prohibition applies to any source of funding, be it funding received from the EU budget or resources raised by EU parties or EU foundations from other actors (e.g. donations from EU citizens).

5.2. 2020 exercise

In 2020, the Authority reviewed, for the second time, the accounts of EU parties and EU foundations. Throughout the exercise, the Authority received and reviewed a large number of submissions from 20 registered entities. The review also involved the Authority in often lengthy discussions with EU parties and EU foundations to identify stumbling blocks and overcome certain difficulties. The main remarks resulting from the 2020 exercise are summarised below.

A major difficulty in the past concerned the fact that EU parties and EU foundations tend to provide different levels of granularity and different formats in their submissions. Some provided detailed submissions *ab initio*. Others provided less extensive information at first and were therefore asked to complement that information to allow the Authority to perform its review in a timely manner. Based on the experience gathered during the first exercise in 2019, and in order to facilitate and speed up the review of accounts in the future, the

Authority has provided a set of templates that help EU parties and EU foundations submit information in a comprehensive yet practical manner. This is aimed at ensuring a comparable level of granularity of information across all accounts. In 2020, the templates were used for the first time, and all EU parties and EU foundations based their reporting on them. This demonstrates that the templates the Authority had prepared were feasible to be used in practice. Even more importantly, the fact that most EU parties and EU foundations have used the templates has significantly increased the comparability of the different EU parties' and EU foundations' submissions and has also helped to harmonise the Authority's checks of the different files.

Where necessary, the Authority has addressed requests for additional information to EU parties and EU foundations.

Overall, EU parties and EU foundations have mostly been cooperative and responsive to communications and requests for information from the Authority.

Through the review of the accounts, the Authority might identify conducts potentially incompatible with Regulation (EU, Euratom) No 1141/2014, which require a formal follow-on procedure. That procedure would aim to ascertain if the conduct concerned amounts to an infringement of the applicable rules, while also guaranteeing the exercise of the right to be heard. Where the Authority establishes that an EU party or an EU foundation fails to respect the rules laid down in Regulation (EU, Euratom) No 1141/2014, it is mandated to impose a financial sanction on it. In such a case, according to the transparency obligations laid down in Regulation (EU, Euratom) No 1141/2014, the Authority must set out the details of, and reasons for, its decision and publish it. In 2020, the Authority did not impose any sanction on an EU party or an EU foundation.



6. EUROPEAN ELECTIONS

The European elections took place between 23 and 26 May 2019. EU citizens voted for a new European Parliament in an election that was preceded by debates and concerns about potential foreign interference in European democracy. During 2020, the Authority reviewed the campaign expenditures of EU parties in the run-up to those elections. The experience gained and information gathered by the Authority, and EU parties, in the context of this election should serve to increase preparedness for the next European elections in 2024. For that reason, the sections that follow discuss the lessons that can be drawn in retrospect with regard to the campaign activities of EU parties, as well as a number of elements that might lead to certain risks of foreign interference in European elections.

6.1. Campaigning principles

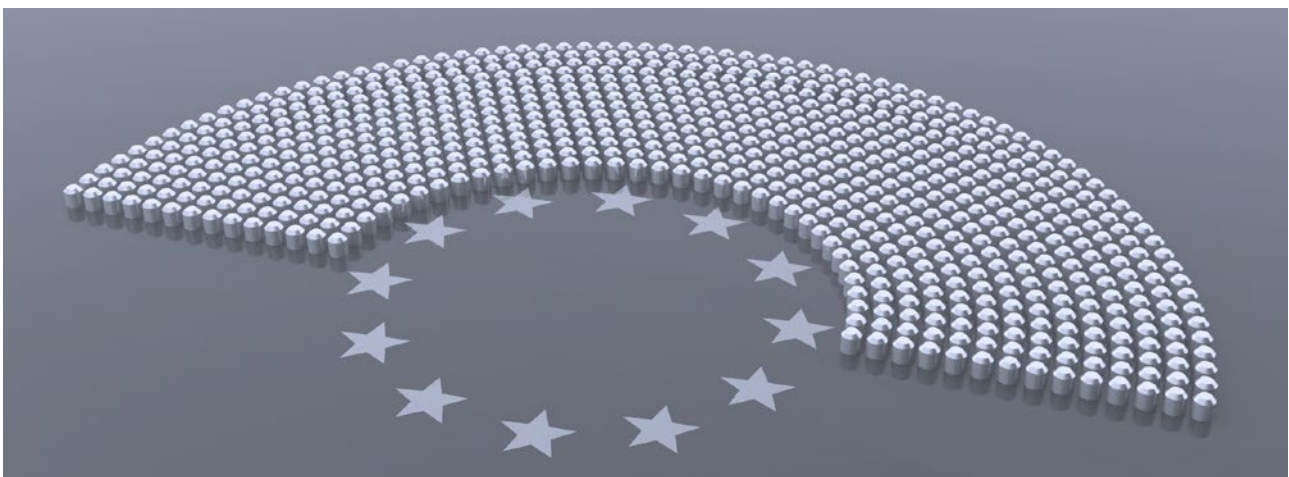
Pursuant to Regulation (EU, Euratom) No 1141/2014, EU parties are entitled to conduct campaigns in the context of European elections. This right to campaign must, however, be read in conjunction with the prohibition of funding (see [Section 5](#) above), which states that EU parties cannot fund, directly or indirectly, other political parties, and in particular national parties or candidates. Already in 2018, several representatives of EU parties stressed that the interaction of the two provisions leads to a certain degree of uncertainty, which could risk hindering their campaigns. They therefore sought guidance from the Authority because, under Regulation (EU, Euratom) No 1141/2014, the Authority is the EU body tasked with administering the prohibition of funding. The Directorate-General

for Finance of the European Parliament cooperated actively and was closely involved in the discussions with EU parties because campaigns also carried a reimbursability aspect under the financial regulation.

The fundamental question behind the right to campaign is **‘What is the role of EU parties in European elections, as opposed to the role of national parties?’**

At the current stage of European integration, EU citizens can cast their vote in European elections by choosing a national party on the ballot paper. It is therefore undeniable that national parties play a major role in European elections. At the same time, as solemnly declared in Article 10(4) of the Treaty on European Union and Article 12(2) of the Charter of Fundamental Rights of the European Union, political parties at European level contribute to forming European political awareness and to expressing the political will of citizens of the EU. It is therefore clear that EU parties also have an important role to play in European elections. This is reflected in Regulation (EU, Euratom) No 1141/2014, which provides that EU parties are entitled to conduct campaigns in the context of European elections.

The natural follow-on question is therefore ‘What elements should a campaign conducted by an EU party feature, and what ones should it avoid?’ To address this question, the Authority and the Directorate-General for Finance of the European Parliament identified a set of principles intended to render the right to campaign operational, while also setting out its limits. Those principles delve into the notion of a European campaign or, to put it differently, focus on the question of whether a campaign is truly European. The Authority,



in cooperation with the Directorate-General for Finance of the European Parliament, set out five principles the respect of which would, in its view, mean that a campaign can be considered a European one.

Scope. Campaigns by EU parties must be carried out in several Member States to be regarded as having a European dimension. This is a reflection of Regulation (EU, Euratom) No 1141/2014, which requires EU parties to achieve representation in at least seven Member States.

Content. Truly European campaigns must also predominantly focus on European topics, that is, topics that affect citizens across the EU. In other words, EU parties must avoid including purely national, regional or local topics in their campaigns.

Ownership. EU parties must always be able to demonstrate that campaigns were carried out in the context of the European elections, and in their interest as contestants in those elections. EU parties must be the owners of the campaigns and take responsibility for them.

Authorship. Campaigns by EU parties must be clearly and unambiguously attributable to them through, for example, logos and banners. Put differently, EU citizens must be able to associate those campaigns with the EU parties running and financing them.

National law. Campaigns by EU parties must be compatible with the applicable national law. This is because, in accordance with the Act concerning the election of the MEPs by direct universal suffrage, funding, limitation and participation in European elections are governed in each Member State by national provisions.

EU parties welcomed the clarifications, even if they emphasised the complexity of the overall legislative framework, which was in part carried forward from Regulation (EC) No 2004/2003 into Regulation (EU, Euratom) No 1141/2014. A renewed discussion on the interaction between European and national legislation and EU parties' right to campaign may be a worthwhile step to pave the way to the 2024 European elections.

As regards practical application, it can be observed that, overall, EU parties took into account the orientations and principles provided by the Authority when designing and carrying out the campaigns for

the 2019 elections to the European Parliament. In particular, the expenditure was in most cases centred on European topics, the scope of campaigning mostly extended to several Member States and the authorship of the EU party financing the campaign was in most cases clearly indicated. This demonstrates that the principles developed by the Authority, in addition to ensuring a high level of compliance with the applicable rules of Regulation (EU, Euratom) No 1141/2014, provided useful practical guidance for EU parties when designing their campaigns and could be applied to concrete cases in practical terms.

With a view to the call for clearer legislation expressed by many EU parties, those principles might therefore serve as useful inspiration for the legislature in the context of the upcoming reform of Regulation (EU, Euratom) No 1141/2014.

6.2. Obstacles to online campaigns

Nowadays, it is difficult to discuss elections without emphasising the role played by technology. Through social media platforms, candidates are able to talk to thousands of voters and amplify – or multiply – the reach of their political messages. It is undeniable that social media platforms have enormous weight in the electoral process and will continue to do so in the foreseeable future. In this context, the importance of personal data, and in particular political sensitivities and inclinations, gained a whole new dimension. Mapping preferences, targeting audiences and identifying swing voters are made dramatically more accurate through the use of data. Therefore, acquisition of and access to personal data for political gain have also become a major concern over the last few years. The EU institutions have also acknowledged the risk of interference and manipulation deriving from our interconnected world. It is therefore worth discussing, albeit briefly, certain implications of this issue for EU parties and their campaigns.

Already before the European elections, several EU parties had contacted the Authority describing difficulties encountered when setting up political campaigns on social media platforms. These parties explained that the restrictions imposed on them made it excessively difficult, if not impossible, to run truly EU-wide campaigns. Such restrictions resulted from policies adopted by social media platforms to combat disinformation and to protect European elections.

These policies included, inter alia, certification processes and payment restrictions designed on a national scale, which disregarded EU parties' wish – and right – to campaign across Europe and reach multiple Member States. The Authority conveyed these concerns to social media platforms. Nevertheless, the Authority lacks formal power over private operators to ensure that EU parties can fully exercise their right to campaign on social media platforms.

Although some of those policies were later revised, this experience represents a cautionary tale for the 2024 European elections. The Authority considers that at least some of the difficulties experienced by EU parties could have been avoided, had all key players been consulted at an early stage. For this reason, it is crucial to set up formal and informal working channels to allow stakeholders – on both sides of the table – to express their views and concerns regarding policies regulating political advertising and to coordinate efforts directed at ensuring free, fair and secure elections.

6.3. Campaigns and personal data

In the same spirit, the Commission unveiled in September 2018 a proposal for a second revision of Regulation (EU, Euratom) No 1141/2014. The revision was part of the 2018 package of measures proposed by the Commission to ensure free, fair and secure European elections. As noted in [Section 3](#) above, Amending Regulation (EU, Euratom) 2019/493 was adopted by the European Parliament and the Council in March 2019. This second revision introduced a verification procedure aiming to impose sanctions on EU parties or EU foundations that deliberately influence, or attempt to influence, the outcome of European elections by taking advantage of data protection breaches. The Authority contributed to the legislative process by providing technical advice.

The practical functioning of the new verification procedure is premised on the timely transmission of information from national instances to the Authority. This is because the verification procedure can only be triggered as a result of an infringement decision adopted by a national data protection authority and transmitted to the Authority. In 2020, the Authority continued its work in reaching out to the Member States and establishing a network of national data protection authorities to render the new verification procedure fully operational. Most Member States have in the meantime provided the

relevant contact information to the Authority. In 2020, no national data protection authority transmitted to the Authority information regarding the imposition of an infringement decision that could trigger the verification procedure in question.

6.4. Threats of foreign interference

The threat of foreign interference in the European political sphere, and in particular in the European elections, has become a constant concern in recent years.

With regard to EU parties and EU foundations and their activities in the context of the European elections in particular, a number of topics merit consideration.

Those topics relate to the question of financial contributions to EU parties and EU foundations, including from outside the EU. Quite obviously, financial contributions from non-EU actors to EU parties or EU foundations bear a certain inherent risk of foreign interference. As regards EU parties, the issue of financial contributions from outside the EU has been settled by the judgment of the General Court in Case T-107/19, *Alliance of Conservatives and Reformists in Europe (ACRE) v European Parliament*, in which the Court held that entities from outside the EU cannot make financial contributions to EU parties. It should be noted that a similar unequivocal clarification has not been made for EU foundations, which is a point the legislature may want to consider in the currently ongoing reform of Regulation (EU, Euratom) No 1141/2014.

As regards financial support from non-members, the rules on donations in Regulation (EU, Euratom) No 1141/2014 apply, including the prohibition on receiving donations from outside the EU, from anonymous sources or from public authorities.

A remaining risk is the potential use of circumvention practices. It should be noted that, in order to effectively detect and prevent such practices, the Authority would need to be equipped with additional enforcement powers, including powers over donors. In addition, requiring confirmatory statements from donors, at least for major donations, and increased due diligence and documentation standards for EU parties and EU foundations are potential solutions that could be explored.

7. OTHER OPERATIONS

In 2020, the Authority carried out a range of other operations, which do not properly fall into one of the categories described in the previous sections. It is useful to provide a brief description of those operations that, far from being minor or ancillary, constitute resource-intensive work streams, which add significant strain on the Authority's limited resources (see [Section 8](#) below).

7.1. Award of EU funding

The Authority regularly cooperates with the European Parliament on the award of EU funding to EU parties and EU foundations. In 2020 (as in the previous years), the Authority assisted the European Parliament in the award of EU funding for the 2021 financial year. In particular, the Authority and the European Parliament discussed, in early 2020, the content of the call for contributions envisaged by Regulation (EU, Euratom) No 1141/2014 and later published in the *Official Journal of the European Union* of 16 June 2020. Between September and November 2020, the Authority then liaised with EU parties regarding the number of MEPs per EU party, which is the central criterion that allows the European Parliament to calculate the amount of EU funding granted to each EU party and EU foundation. To carry out that task, the Authority reviewed the relevant sections of the applications for funding received by the European Parliament and asked EU parties to provide clarifications. It then reviewed the supplemental submissions and communicated the numbers of MEPs to the European Parliament, which then finalised the award in accordance with the applicable rules.



7.2. The Authority's website

Regulation (EU, Euratom) No 1141/2014 introduced extensive transparency requirements for EU parties and EU foundations. The Authority divulges information to EU citizens through its website (<http://www.appf.europa.eu>). More specifically, EU citizens are able to access a wide array of information regarding, among other things, the composition of EU parties and EU foundations, their statutes and their governing structures. The categories of information available through the website can be summarised as follows:

- ▶ decisions to register or not to register applicants, including documentation submitted as part of the applications and amendments;
- ▶ lists of MEPs who are members of an EU party;
- ▶ data regarding donors and corresponding donations, subject to certain safeguards to protect natural persons' personal data (essentially, aggregation under the label 'minor donations');
- ▶ data regarding contributions received by EU parties and EU foundations (excluding contributions from natural persons);
- ▶ the details of and reasons for final decisions taken by the Authority regarding sanctions, including deregistration decisions.

In addition, the Authority publishes its decisions to register, not to register and to deregister EU parties and EU foundations in the *Official Journal of the European Union*.

The Authority has, during the expansion process of its website in the process of migration to a new IT tool, added a number of additional information and documentation, such as:

- ▶ a consolidated list of MEPs (listing the MEPs of all EU parties);
- ▶ details of the past and current composition of the Committee of Independent Eminent Persons;

- ▶ an additional section providing information related to sanctions of the Authority and opinions of the Committee of Independent Eminent Persons;
- ▶ information about the Authority's policy on access to documents and about its personal data rules;
- ▶ additional information referring to donations and contributions related to past financial years of all EU parties and EU foundations;
- ▶ more detailed information on the provisions regarding the standard extracts and certification from the Register; and
- ▶ references to information and documentation published by the Directorate-General of Finance of the European Parliament.



These additions made the Authority's website richer in providing additional information for the reader and thereby enhanced its transparency, made it more user-friendly and enabled readers to easily identify specific information of interest to them. The Authority's website also now looks more contemporary and upgraded to today's IT standards.

Currently the Authority is in the process of adding all official languages of the EU, with the aim of making the information displayed easily readable by all EU citizens.

7.3. Compliance with EU values

Regulation (EU, Euratom) No 1141/2014 introduced a procedure for assessing if EU parties and EU foundations comply with the values upon which the EU is founded. That procedure is complex and may involve the

European Parliament, the Council and the Commission, as well as an additional committee established by Regulation (EU, Euratom) No 1141/2014 in an advisory role, the Committee of Independent Eminent Persons. For example, the European Parliament – acting on its own initiative or following a reasoned request from a group of citizens – may request the Authority to verify a specific EU party's or foundation's compliance with EU values. The Authority will in turn consult with the Committee of Independent Eminent Persons about the case and then decide whether or not to deregister the EU party or foundation concerned. Ultimately, a decision to deregister an EU party or foundation could still be blocked by the European Parliament and the Council, which are entitled to raise objections in accordance with their respective decision-making rules. In 2020, the EU institutions did not trigger this procedure.

7.4. Litigation before the EU courts

In 2020 the Authority participated as an intervener in support of the European Parliament in Case T-107/19, *Alliance of Conservatives and Reformists in Europe (ACRE) v European Parliament*. The Authority decided to intervene because certain aspects of the litigation have significant implications for the conduct of its administrative procedures. The General Court handed down its judgment on 25 November 2020. In the judgment, the Court confirmed the arguments brought forward by the Authority. The judgment clarified a number of questions with regard to the interpretation of the provisions of Regulation (EC) No 2004/2003, the predecessor to Regulation (EU, Euratom) No 1141/2014. Many of those provisions were transferred identically or with only very minor modifications into Regulation (EU, Euratom) No 1141/2014. The reasoning of the Court is therefore highly relevant to the interpretation of Regulation (EU, Euratom) No 1141/2014 and will guide its future application in many respects.

In particular, the Court pronounced on the legality of financial contributions from outside the EU and on the burden of proof with respect to the prohibition of funding set out in Article 22 of Regulation (EU, Euratom) No 1141/2014.

8. ADMINISTRATIVE SET-UP

This section provides a brief overview of the administrative set-up of the Authority. For a number of aspects of administration, the Authority is embedded within the European Parliament's administration. Its budget is also part of the budget of the European Parliament. Personnel are, however, selected and appointed by the Authority and subject to the direction of the Director of the Authority. The paragraphs below describe this set-up in more detail and offer some background to understand its evolution over time.

8.1. Infrastructure and budget

Pursuant to Regulation (EU, Euratom) No 1141/2014, the Authority is physically located in the European Parliament, which provides it with the necessary offices and administrative support. Working arrangements with several departments of the European Parliament are in place or being discussed in the light of the specific setting of the Authority, which raises certain challenges. On the one hand, the Authority requires the cooperation of the European Parliament on a number of administrative and practical matters. On the other hand, the Authority is set up as an independent body, with its own budget and staff, to implement and enforce Regulation (EU, Euratom) No 1141/2014. Finding the correct equilibrium, including budgetary mechanisms, among all the interests at stake has proven time-consuming. That said, the Authority would not have been able to operate without the assistance and efforts of the European Parliament.

The Authority's budget is a separate title in the section on the European Parliament in the general budget of the EU. In 2018, the Authority published its draft budgetary plan for 2019 in accordance with Article 6(7) of Regulation (EU, Euratom) No 1141/2014. The draft budgetary plan was presented to the coordinators of the Committee on Budgets of the European Parliament. Based on that practice, in 2019 and 2020 the Authority drafted and published new draft budgetary plans for 2020 and 2021 respectively.

As set out in more detail in the budgetary plans published on the website of the Authority, the largest part of the Authority's budget consists of direct support provided to it by the services of the European Parliament's Secretariat. For needs that cannot be addressed through such direct support, the Authority also has a

relatively small appropriation in budget item '5 0 0' for 'Operational expenditure of the Authority for European Political Parties and European Political Foundations'. In 2020, that appropriation amounted to EUR 285 000.

Throughout 2020, the Authority incurred budgetary expenditure under that budget item for specific job training of staff members and for purchase of office supplies.

8.2. Human resources

Human resources, and notably personnel, has been the Authority's major hurdle since its inception. The original text of Regulation (EU, Euratom) No 1141/2014 set out that one or more EU institutions would provide the Authority with staff, and clarified that such staff would act under the sole authority of the Director. The European Parliament made the necessary arrangements to make personnel available to the Authority as of 2016. By the end of 2017, the Authority's staff comprised two full-time employees, plus the Director. That staffing level was not sufficient to allow the Authority to discharge its mandate fully and, concurrently, to complete its internal set-up. The setting was also a problem in terms of independence and business continuity.

In 2018, the EU institutions took decisions with both a short-term and a long-term impact to address the issue. On 12 September 2018, the Commission put forward a proposal for Amending Regulation (EU, Euratom) 2019/493, which was followed by Amending Letter No 1 to the 2019 Draft General Budget of 16 October 2018. In essence, those measures proposed to provide the Authority with additional staff and conferred on the Director the powers of an appointing authority under the Staff Regulations of Officials of the European Union and the Conditions of Employment of Other Servants of the Union, laid down in Council Regulation (EEC, Euratom, ECSC) No 259/68 of 29 February 1968.

In the first half of 2020, the number of full-time employees was eight, plus the Director. One colleague left the Authority in summer 2020. At the time of writing, the Authority is in the process of recruiting additional personnel in order to fill a number of vacant positions resulting from the departure of additional staff members in 2021.

The most recent experience suggests that the human resources put at the disposal of the Authority are in principle sufficient to handle ordinary day-to-day operations. However, the Authority comes under significant strain when faced with multiple overlapping tasks or with extraordinary or non-recurrent work streams such as litigation before the EU courts or

formal proceedings pursuant to Regulation (EU, Euratom) No 1141/2014. Additional human resources will need to be provided for if the legislature decides in the ongoing reform of Regulation (EU, Euratom) No 1141/2014 to expand the mandate of the Authority or confer additional tasks on it.



9. CONCLUSION

For the Authority, 2020 was another extraordinary year. The restrictions caused by the COVID-19 pandemic required a large amount of flexibility with regard to working arrangements, and a high level of resilience and commitment from staff. Flexibility was also required in the Authority's contacts with EU parties and EU foundations, for example as regards the format of written submissions.

Regarding applications for registration, following the entry into force of the 2018 reform of Regulation (EU, Euratom) No 1141/2014 new, tighter requirements were put in place. As a result of the reform, new applications for registration had decreased during 2019. That trend reversed in 2020. Two new applicants filed applications for registration with the Authority in 2020 and both were rejected. It is expected that the new dynamic will continue, given the current scope of the registration conditions.

The second review of the financial accounts of EU parties and EU foundations showed that they increasingly rely on formats and templates provided by the Authority. This is a positive development and increases the comparability and accuracy of the information submitted.

In addition to these work streams, the Authority also conducted its day-to-day activities. These include – among others – the regular verification of EU parties' and EU foundations' compliance with the registration conditions, with a strong emphasis on compliance with the minimum representation criterion. The Authority has been continuously updating the information and documentation on its website. Like in previous years, the Authority cooperated with the European Parliament on the award of funding to EU parties and EU foundations.

At the same time, the Authority has handled a number of general work streams, like comparable EU bodies, for

example human resources, general administration and logistics (including negotiations on the texts of service level agreements with the European Parliament).

In August 2020, the Authority adopted a decision concerning public access to documents held by the Authority. The Authority also significantly advanced its policies with regard to the protection of personal data.

During 2020, the Authority also started to revamp its website in order to achieve even better visibility of information for the reader. That process was concluded in early 2021 and the expanded website has been online since 14 April 2021.

An *ex post* examination of the campaign activities of EU parties in the context of the 2019 European elections shows that most EU parties based their campaign activities on the guiding principles developed by the Authority in cooperation with the Directorate-General for Finance of the European Parliament. This significantly reduced the risk of infringements, and demonstrates the usefulness and practical applicability of those principles.

As in most pieces of legislation, areas remain where Regulation (EU, Euratom) No 1141/2014 could be improved. This is the case, for example, with regard to some rules in the area of donations and contributions, which bear a certain risk of potential misuse that could also lead to potential undue influence from outside the EU.

It is therefore good news that the Commission has announced a review of the legislation on the funding of European political parties. That review is an opportunity to further improve the regulation. The Authority looks forward to actively contributing to that reform process, as in the past, by providing technical advice to the Commission and the co-legislators whenever necessary.

10. APPENDIX

10.1. Section 1: EU parties and EU foundations

The series of tables below sets out the currently registered EU parties, along with their affiliated EU foundations. The tables also display the national or regional political parties that were retained for the purpose of representation – following the verification that was carried out in September and October 2020 – at the time of applications by EU parties and EU foundations for EU funding for 2021. (The tables are in order of date of registration with the Authority.)

EU Party 1: Alliance of Liberals and Democrats for Europe Party

Alliance of Liberals and Democrats for Europe Party (ALDE)

Seat: Belgium



Representation – following the verification carried out in September and October 2020



Mouvement Réformateur
Reformist Mouvement



Venstre, Danmarks Liberale Parti
Left, Liberal Party of Denmark

VENSTRE



Freie Demokratische Partei
Free Democratic Party

Freie Demokraten
FDP



Demokratische Partei
Democratic Party



Democraten 66
Democrats 66



NEOS – Das Neue Österreich und Liberales Forum
NEOS – The New Austria and Liberal Forum

neos



Centerpartiet
Centre Party



Affiliated EU foundation

European Liberal Forum (ELF)

Seat: Belgium



EU Party 2: European People's Party

European People's Party (EPP)

Seat: Belgium



Representation – following the verification carried out in September and October 2020



Christen-Democratisch en Vlaams
Christian Democratic and Flemish



Граждани за европейско развитие на България
Citizens for European Development of Bulgaria



**Křesťanská a demokratická unie
Československá strana lidová**
Christian and Democratic Union
Czechoslovak People's Party



Fine Gael



Δημοκρατικός Συναγερμός
Democratic Rally



Christen-Democratisch Appèl
Christian Democratic Appeal



Partido Social Democrata
Social Democratic Party



Affiliated EU foundation

Wilfried Martens Centre for European Studies (WMCES)

Seat: Belgium



EU Party 3: Party of European Socialists

Party of European Socialists (PES)

Seat: Belgium



Representation – following the verification carried out in September and October 2020



Parti Socialiste
Socialist Party



Българска социалистическа партия
Bulgarian Socialist Party



Irish Labour Party



Partito Democratico
Democratic Party



Magyar Szocialista Párt
Hungarian Socialist Party



Sozialdemokratische Partei Österreichs
Social Democratic Party of Austria



Partido Socialista
Socialist Party



Affiliated EU foundation

Foundation for European Progressive Studies (FEPS)

Seat: Belgium

FOUNDATION FOR EUROPEAN
PROGRESSIVE STUDIES
FONDATION EUROPÉENNE
D'ÉTUDES PROGRESSISTES



EU Party 4: European Democratic Party

European Democratic Party (EDP)

Seat: Belgium



Representation – following the verification carried out in September and October 2020



Freie Wähler
Free Voters



Euzko Alderdi Jeltzalea – Partido Nacionalista Vasco
Basque Nationalist Party



Mouvement Démocrate
Democratic Movement



Narodna stranka – Reformisti
People's Party – Reformists



Συμμαχία Πολιτών
Citizens' Alliance



Új Kezdet
New Start



Demokratska stranka upokojencev Slovenije
Democratic Party of Pensioners of Slovenia



Affiliated EU foundation

Institute of European Democrats (IED)

Seat: Belgium



EU Party 5: European Free Alliance

European Free Alliance (EFA)

Seat: Belgium



Representation – following the verification carried out in September and October 2020



Nieuw-Vlaamse Alliantie
New Flemish Alliance



Südschleswigsche Wählerverband
South Schleswig Voters' Association



Esquerra Republicana de Catalunya
Republican Left of Catalonia



Partitu di a Nazione Corsa
Party of the Corsican Nation



Fryske Nasjonale Partij
Frisian National Party



Ålands Framtid
Future of Åland



Plaid Cymru
Party of Wales



Latvijas Krievu savienība
Latvian Russian Union



Affiliated EU foundation

Coppieters Foundation
(formerly Centre Maurits Coppieters)

Seat: Belgium



EU Party 6: European Green Party

European Green Party (EGP)

Seat: Belgium



Representation – following the verification carried out in September and October 2020



Europe écologie – Les Verts
Europe ecology – the Greens



Déli Gréng
The Greens



Die-Grünen
The Greens



Vihreät – De Gröna
Green Party

Vihreät De Gröna



Miljöpartiet de Gröna
Green Party



GroenLinks

GROENLINKS



Groen



The Green Party of England and Wales



Affiliated EU foundation

Green European Foundation (GEF)

Seat: Luxembourg



EU Party 7: Party of the European Left

Party of the European Left

Seat: Belgium



Representation – following the verification carried out in September and October 2020



Die Linke
The Left

DIE LINKE.



Syriza
Coalition of the Radical Left

ΣΥΡΙΖΑ



Izquierda Unida
United Left

TU IZQUIERDA



Parti Communiste français
French Communist Party



Bloco de Esquerda
Left Bloc

Bloco de Esquerda



Levica
The Left

LEVICA



Vasemmistoliitto
Left Alliance

vasemmisto



Enhedslisten
The Red–Green Alliance

ENHEDSLISTEN

Affiliated EU foundation

Transform Europe (TE)

Seat: Belgium



EU Party 8: European Conservatives and Reformists Party

European Conservatives and Reformists Party (ECRP/ECR Party) (formerly Alliance of Conservatives and Reformists in Europe)

Seat: Belgium



Representation – following the verification carried out in September and October 2020



ВМРО – Българско национално движение
IMRO – Bulgarian National Movement



Občanská demokratická strana
Civic Democratic Party



Hrvatska konzervativna stranka
Croatian Conservative Party



Nacionālā apvienība “Visu Latvijai!”
National Alliance ‘All For Latvia!’



**Lietuvos lenkų rinkimų akcija
Krikščioniškų šeimų sąjunga**
Electoral Action of Poles in Lithuania
Christian Families Alliance



Sloboda a Solidarita
Freedom and Solidarity



Fratelli d'Italia
Brothers of Italy



The Conservative and Unionist Party



Affiliated EU foundation

New Direction – The Foundation for European Reform (New Direction)

Seat: Belgium



EU Party 9: European Christian Political Movement

European Christian Political Movement (ECPM)

Seat: Netherlands



Representation – following the verification carried out in September and October 2020



Familien-Partei Deutschlands
Family Party of Germany



Human Dignity Alliance



Parti chrétien-démocrate
Christian Democratic Party



Hrast – Pokret za uspješnu Hrvatsku
Hrast – Movement for Successful Croatia



ChristenUnie
Christian Union



Partido Popular Monárquico
People's Monarchist Party



**Uniunea Democratică a Slovacilor
și Cehilor din România**
Democratic Union of Slovaks
and Czechs of Romania



Affiliated EU foundation

Sallux

Seat: Netherlands



EU Party 10: Identité et Démocratie Parti

Identity and Democracy Party (IDP/ID Party)
(formerly Mouvement pour une Europe des Nations et des Libertés)
Seat: France



Representation – following the verification carried out in September and October 2020



Vlaams Belang
Flemish Interest



Воля (Volya)
Will



Svoboda a přímá demokracie
Freedom and Direct Democracy



Eesti Konservatiivne Rahvaerakond
Conservative People's Party of Estonia



Rassemblement national
National Rally



Legha Nord
Northern League



Freiheitliche Partei Österreichs
Freedom Party of Austria



Sme Rodina – Boris Kollár
We Are Family – Boris Kollár



Affiliated EU foundation

Association pour l'Identité et Démocratie Fondation (IDF/ID Foundation)
(formerly Fondation pour une Europe des Nations et des Libertés)
Seat: France



10.2. Section 2: National contact points

The Member States that provided their designated National Contact Point to the Authority in accordance with Regulation (EU, Euratom) No 1141/2014 are listed below.

Figure 1: Available National Contact Points

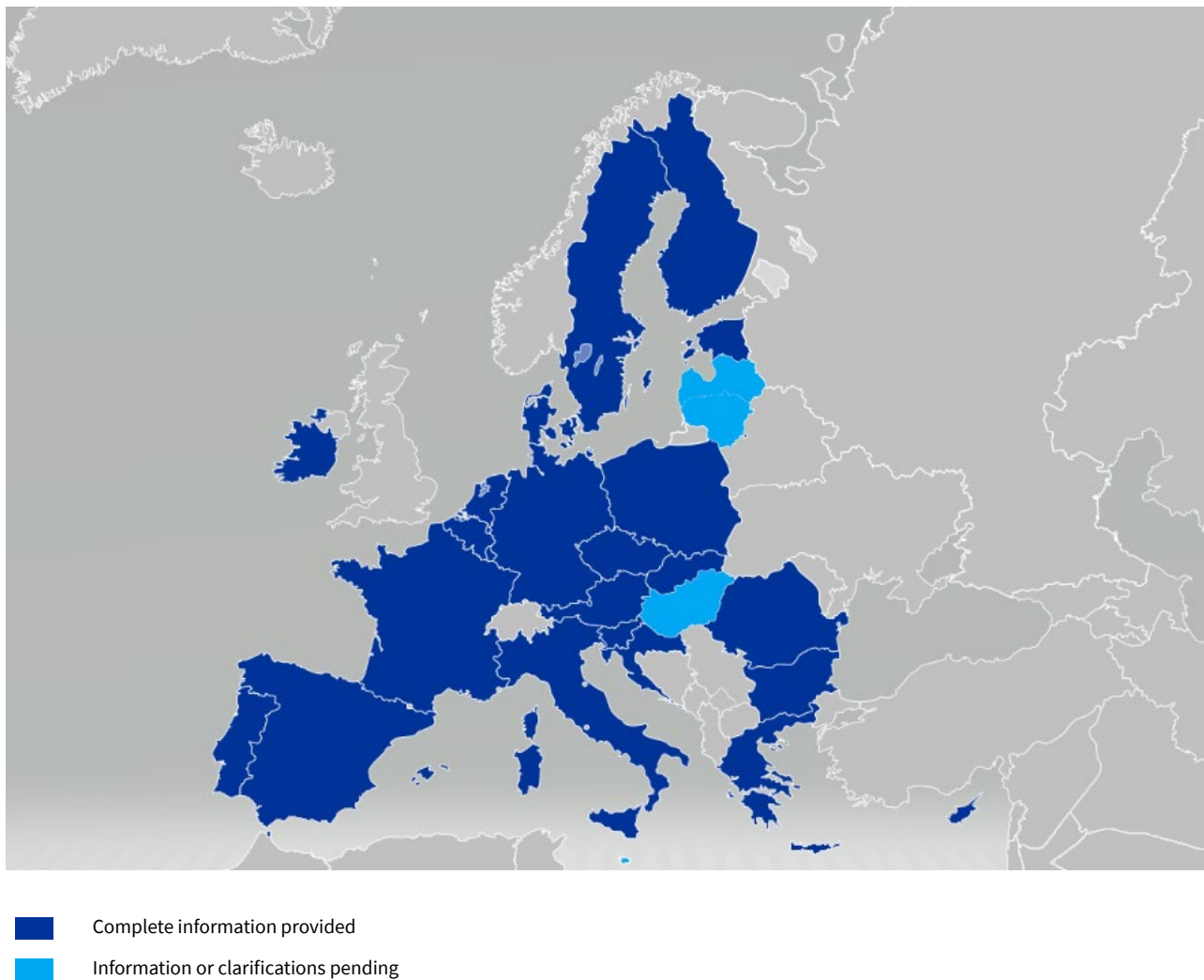


Table 2: List of National Contact Points

Member State	National Contact Point
Belgium	SPF Affaires étrangères/FOD Buitenlandse Zaken
Czechia	Ministry of Finance
Denmark	The Ministry of the Interior and Housing
Germany	Federal Ministry of the Interior, Building and Community
Estonia	Ministry of Justice (Public Law Department)
Ireland	Department of Housing, Planning and Local Government
Greece	Ministry of Interior
Spain	Agencia Española de Protección De Datos (Spanish Data Protection Agency)
France	Commission Nationale des Comptes de Campagne et des Financements Politiques
Croatia	Ministry of Public Administration
Italy	Commissione di garanzia degli statuti e per la trasparenza e il controllo dei rendiconti dei partiti politici
Cyprus	Ministry of Interior
Luxembourg	Ministère d'État
Netherlands	Ministry of the Interior and Kingdom Relations (Directorate Democracy Governance)
Austria	Bundeskanzleramt (Federal Chancellery)
Poland	National Election Committee
Portugal	Entidade das Contas e Financiamentos Políticos – Tribunal Constitucional (Entity for Political Financing and Accounts – Portuguese Constitutional Court)
Romania	Permanent Electoral Authority
Slovenia	Agencija Republike Slovenije za javnopravne evidence in storitve (Agency of the Republic of Slovenia for Public Legal Records and Related Services)
Slovakia	Ministry of Interior
Finland	Ministry of Justice (Department for Democracy and Public Law)
Sweden	Kammarkollegiet (The Legal, Financial and Administrative Services Agency)

Overview of situation on 1 July 2021. The Authority has not yet received the information or has received incomplete information from the following Member States: Bulgaria, Latvia, Lithuania, Hungary, Malta.

Getting in touch with the EU

In person

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- at the following standard number: +32 22999696 or
- by email via: https://europa.eu/european-union/contact_en

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