



**DECISION OF THE AUTHORITY FOR EUROPEAN POLITICAL PARTIES AND
EUROPEAN POLITICAL FOUNDATIONS
of 4 December 2025
IMPOSING SANCTIONS ON THE EUROPEAN POLITICAL PARTY
'PARTY OF THE EUROPEAN LEFT'
(Only the English text is authentic)**

THE AUTHORITY FOR EUROPEAN POLITICAL PARTIES AND EUROPEAN
POLITICAL FOUNDATIONS

Having regard to

- the Treaty on European Union, and in particular Article 10, paragraph 4, thereof,
- the Treaty on the Functioning of the European Union, and in particular Article 224 thereof,
- 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, as amended¹ (hereinafter 'Regulation (EU, Euratom) No 1141/2014'), and in particular Articles 20, 22, 27 and 29 thereof,

Whereas:

- (1) The Party of the European Left (hereinafter 'EL') has its seat in Brussels, Belgium, and was registered as a European political party by decision of 7 August 2017 of the Authority for European Political Parties and European Political Foundations (hereinafter the 'Authority') (2017/C 428/11).
- (2) On 27 June 2025 EL submitted to the Authority financial statements and other documentation relating to the year 2024 in view of Article 23(1) of Regulation (EU, Euratom) No 1141/2014. The Authority requested from EL by emails of 22 July and 12 September 2025 additional information, to which EL submitted replies on 25 July 2025 and 19 September 2025, respectively, concerning the following interactions:
 - a trip of an EL delegation to Venezuela on the occasion of the presidential elections in that country on 28 July 2024, following an invitation by the *Partido Socialista Unido de Venezuela* ('PSUV') and involving acceptance of travel costs relief from non-EU origin, and
 - financial participation in an activity at "Espace Niemeyer" in Paris, France involving the *Parti communiste français* ('PCF') on 2 February 2024, entitled "Soirée Haïti et sa révolution".
- (3) The facts and legal assessment of these interactions are set out separately hereinafter.

¹ OJ L 317, 4.11.2014, p. 1, as amended by Regulation (EU, Euratom) 2018/673 of the European Parliament and of Council of 3 May 2018, OJ L 114I, 4.5.2018, p. 1, and by Regulation (EU, Euratom) 2019/493 of the European Parliament and of Council of 25 March 2019, OJ L 85I, 27.3.2019, p. 7.

ACCEPTANCE OF TRAVEL COSTS RELIEF FROM VENEZUELA

FACTS AND PROCEDURE

- (4) Following an invitation by [REDACTED] on behalf of the *Partido Socialista Unido de Venezuela* ('PSUV'), a group of seven EL representatives (the 'delegation') travelled to Venezuela on the occasion of that country's presidential elections of 28 July 2024. The delegation participated in organised activities such as a video-transmitted speech of [REDACTED] and a visit to a polling station. The delegation also had a photograph taken in front of a portrait of [REDACTED], one of the contestants in the election of 2024, as well as a photograph with a flag carrying the EL logo and with raised fist in front of a poster *Encuentro con acompañantes internacionales - Elecciones Presidenciales 2024*.
- (5) EL indicated in its submissions concerning the year 2024 of 27 June 2025 and 25 July 2025 to have paid EUR 673.20 in respect of the delegation's trip to Venezuela and provided the following description: "*Trip organised by the International Relations Working Group with local associations and political organizations to support the struggles of the global left and strengthen international cooperation*". The documentation submitted to the Authority contained the following additional explanation: "*The total cost of this activity is limited to the cost borne by the EL to cover the participation of its representatives to the aforementioned activity.*"
- (6) By its email of 22 July 2025, the Authority requested details regarding EL's cooperation partners.
- (7) EL stated in its reply of 25 July 2025: "*We would like to clarify that if we originally did not include cooperation partners' names for the activities you listed in the second part of point 3, it is because we did not consider these organizations as cooperation partners in the frame of an event. These organizations either invited EL political representatives or facilitated logistical arrangements for our representatives to carry out planned objectives on the ground, exercising our international relations (primarily political exchange and information gathering)*". In the attachments to its email of 25 July 2025 to the Authority, EL provided the following information concerning cooperation partners in this activity: "*Partido Socialista Unido de Venezuela (PSUV – Asuntos Internacionales)*".
- (8) By its email of 12 September 2025, the Authority requested the following additional documentation in relation to this activity: "*i. photographs taken during the activity, and ii. contractual and financial arrangements in place with cooperation partners in this activity*".
- (9) EL replied by email of 19 September 2025 with the following comments on the attachments: "*a. Pictures in the link.; b. No contractual agreements as our mission was to observe the elections*".
- (10) Apart from photographic material, EL submitted to the Authority an electronic copy of a letter in Spanish language dated 8 April 2024, signed by [REDACTED]

██████████ on behalf of the Venezuelan Socialist Party (*Partido Socialistas Unido De Venezuela*), addressed to ██████████, "Partido de Izquierda Europea". The main content of this letter is set out in the following:

"Reciba usted un saludo solidario de parte del Partido Socialista Unido de Venezuela. Aprovecho la oportunidad para expresar, en nombre del pueblo bolivariano, nuestro profundo respeto y reconocimiento por la causa que usted diariamente emprende a favor de la felicidad de los pueblos del mundo.

Como usted sabe, el próximo 28 de julio se celebrarán en Venezuela las elecciones presidenciales para el período 2025 - 2031. Este evento es de trascendental importancia para el destino de la Revolución Bolivariana y demás procesos políticos en América Latina y el mundo. En esta elección, el Presidente Nicolás Maduro Moros es el candidato de la esperanza y la dignidad de la Patria de Bolívar y Chávez, con quien garantizamos la estabilidad y felicidad en el futuro, el fortalecimiento de la unidad latinoamericana y la construcción de un mundo más humano y multipolar.

En ese sentido, le extendemos nuestra invitación para que acompañe a nuestro pueblo durante el desarrollo dicho evento electoral. De ser positiva su respuesta, le solicitamos respetuosamente confirmar su voluntad a través del correo electrónico: ██████████, así como compartir por esa vía su teléfono de contacto y documento de viaje. Esperamos su respuesta afirmativa antes del 30 de abril a fin de ampliar /os detalles logísticos respectivos a su participación en esta jornada tan especial.

Sin nada más que agregar, le reitero en nombre del ██████████ nuestra plena solidaridad y compromiso con su lucha, la cual también es nuestra lucha".

- (11) In its cover email of 19 September 2025 to the Authority, EL also provided the following additional explanations: *"Also, on another note regarding election observation missions, as it is the first compliance cycle we are exchanging on this type of expense, please allow me to clarify: The only fact which all of them have in common is that we are never cooperating financially with anyone when sending a delegation on these missions. All the other factors, vary a lot depending on various factors such as the country itself and how it deals with election observation missions. For sure, we would not go to observe elections in countries who forbid it. But apart from that, as you can see in the files we send you, Mexico, for example, have a long standing tradition of a very open and organized electoral committee which has a whole apparatus of organizing and welcoming international observation missions. In other countries it may not be the case and while they are not forbidding international electoral observation missions, they also typically won't have any information workshops/seminars/materials etc. which we in turn could show you as proof. What we typically do is to try and meet, apart of the election observation on election day, political parties and/or foundations in order to get a grasp of the current political climate around the election and thus to be able to write a more inclusive report of our mission later on".*
- (12) ██████████ is, and was already at the time of the invitation, subject to sanction by the European Union as being *"Involved in undermining democracy and the rule of law in Venezuela and the repression of civil society and democratic opposition, including by using the media to publicly attack and threaten political opposition, other media and civil society and giving orders to detain individuals, including to the Bolivarian National Intelligence Service (SEBIN)"* (point 7 of Annex I to Council Decision (CFSP) 2017/2074 of 13 November 2017 concerning restrictive

measures in view of the situation in Venezuela, OJ L 295 14.11.2017, p. 60, as amended in particular by Council Decision (CFSP) 2023/2498 of 10 November 2023, OJ L, 2023/2498, 13.11.2023).

- (13) According to publicly available information on 2024 prices, travel costs per person from the European Union to Venezuela amounted to at least EUR 480 for a return flight, and a night in a simple hotel accommodation in Caracas at least EUR 30 per person.

Opening of investigation, right to be heard and opportunity to take corrective measures

- (14) By letter of 17 October 2025, the Authority informed EL to have opened an investigation concerning the above-mentioned interaction with PSUV and provided a summary of the available facts, as well as an interim assessment indicating that EL had infringed of Article 20(5)(d) of Regulation (EU, Euratom) No 1141/2014.
- (15) The Authority gave EL the opportunity to comment until 18 November 2025 and to take appropriate corrective measures to remedy the situation pursuant to Article 29(1) of Regulation (EU, Euratom) No 1141/2014 until the same date.
- (16) In its reply to the Authority of 18 November 2025, EL stated: *"You will find a signed statement from our responsible for international relations and member of our political secretariat - Maite Mola - giving a practical explanation for our activity as electoral observers in the Venezuelan elections in 2024."*
- (17) EL provided a document dated 17 November 2025 in English and Spanish language concerning this activity by which [REDACTED], [REDACTED] and informed that EL representatives participated in an "observation delegation in 2024" to Venezuela. The wording of the English version of the letter as provided to the Authority is set out below:

"Explanation about EL Delegation to Observe Venezuela Elections 2024

[...] as EL-head of international relations, I would like, as you requested, to send you a written explanation on the above matter following the launch of an investigation by the European Parliament's Authority for Political Parties and European Foundations (APPF). The Party of the European Left, together with other organizations worldwide, has been involved in election observation work in Latin America and Africa for many years. The constitutions of some countries on these continents recognize this task of international observation, while others do not. Venezuela is a special case where it is customary and normal for national parties from all political spheres to invite foreign organizations to help observe elections. This was the case with our observation delegation in 2024. I confirm with my signature as long-standing international representative, former vice-president and member of the current political secretariat of the EL that the way in which we acted as observers, including the expenses incurred, was the only way possible on our part."

- (18) In its reply of 18 November 2025, EL did not indicate that it reimbursed any advantage received, nor that it had taken or was proposing any other remedial action.

ASSESSMENT OF THE FACTS IN LIGHT OF THE LEGAL FRAMEWORK

- (19) According to Article 2(7) of Regulation (EU, Euratom) No 1141/2014, “*'donation' means any cash offering, any offering in kind, the provision below market value of any goods, services (including loans) or works, and/or any other transaction which constitutes an economic advantage for the European political party or the European political foundation concerned, with the exception of contributions from members and of usual political activities carried out on a voluntary basis by individuals.*”
- (20) Article 20(5)(d) of Regulation (EU, Euratom) No 1141/2014 provides that “*European political parties and European political foundations shall not accept any of the following: [...] (d) donations from any private entities based in a third country or from individuals from a third country who are not entitled to vote in elections to the European Parliament.*”
- (21) Pursuant to Article 20(6) of Regulation (EU, Euratom) No 1141/2014, “*any donation that is not permitted under this Regulation shall within 30 days following the date of its receipt by a European political party or a European political foundation: (a) be returned to the donor or to any person acting on the donor's behalf; or (b) where it is not possible to return it, be reported to the Authority and the European Parliament. The Authorising Officer of the European Parliament shall establish the amount receivable and authorise the recovery in accordance with the provisions laid down in Articles 78 and 79 of the Financial Regulation. The funds shall be entered as general revenue in the European Parliament section of the general budget of the European Union.*”
- (22) Article 27(2)(b)(i) of Regulation (EU, Euratom) No 1141/2014 provides that:
“*2. The Authority shall impose financial sanctions in the following situations: [...] (b) quantifiable infringements:
(i) where a European political party or a European political foundation has accepted donations and contributions that are not permitted under Article 20(1) or (5), unless the conditions laid down in Article 20(6) are met;*”.
- (23) Article 29(1) and (2) of Regulation (EU, Euratom) No 1141/2014 provides that:
“*1. Before taking a final decision relating to any of the sanctions referred to in Article 27, the Authority or the Authorising Officer of the European Parliament shall give the European political party or the European political foundation concerned an opportunity to introduce the measures required to remedy the situation within a reasonable period of time, which shall not normally exceed one month. In particular, the Authority or the Authorising Officer of the European Parliament shall allow the possibility of correcting clerical and arithmetical errors, providing additional documents or information where necessary or correcting minor mistakes.
2. Where a European political party or a European political foundation has failed to take corrective measures within the period of time referred to in paragraph 1, the appropriate sanctions referred to in Article 27 shall be decided.*”

a) Introductory remarks on the regulatory framework

- (24) A donation is any economic advantage received by a European political party or a European political foundation from a non-member. The economic advantage concept underlying the definition of donation means that not only upfront payments in favour of a European political party are covered by this provision, but also circumstances in which the advantage is provided in another form, such as payments to a third party so as to relieve the European political party of expenses or debts, or reimbursement of expenses incurred.
- (25) Acceptance of upfront payments, reimbursements, debt relief or any other form of economic advantage cannot be offset, or otherwise removed from the legal constraints that apply to donations, by providing 'services' or other counterpart actions that do not fall within the lawful and legitimate scope of activities of European political parties as laid down in Article 10(4) of the Treaty on European Union and Regulation (EU, Euratom) No 1141/2014.
- (26) If a donation has been received by a European political party or European political foundation, the corresponding ceiling and prohibitions of origin laid down in Article 20(1) and (5) of Regulation (EU, Euratom) No 1141/2014 apply, and in accordance with Article 20(6) thereof a requirement arises within 30 days to return prohibited donations or, if impossible, notify Authority and European Parliament with a view to paying the corresponding amount to the Union budget.

b) Application to the facts of the case

i) Economic advantage in favour of EL from third country origin

- (27) The expenses incurred by EL for the delegation's travel to Venezuela, as reported to the Authority by EL, amounted to EUR 673.20.
- (28) EL's delegation therefore manifestly received financial support in form of a payment, reimbursement or travel service from or on behalf of PSUV that invited them, amounting to the difference between the payment made by EL for its delegation and the minimum real cost of travel (European Union-Venezuela and back) and accommodation (at least 2 nights), i.e. a minimum of EUR 3106.80 (= 7x480 + 7x60 ./ 673.20). This economic advantage was received by EL itself, even if it was paid out or otherwise provided to the members of the delegation of EL, since it reduced the travel expenses borne by EL.
- (29) The economic advantage thus received by EL from Venezuela was not offset by any lawful and legitimate 'service' provided by EL in return. More particularly, EL did not contribute to forming Union citizens' European political awareness, nor did it provide any European added value on behalf of Union citizens, as required in light of Article 10(4) of the Treaty on European Union, when its delegation travelled to Venezuela and participated in activities upon invitation, in the interest of, and mostly paid by, the currently ruling party PSUV.
- (30) Moreover, EL's delegation presents itself as part of an international election observation effort, especially in light of the invitation letter, the 'international

accompanier' status, and a visit to a polling station. This allegation to act as election observers also is confirmed by EL in its reply of 18 November 2025 to the right to be heard. However, the delegation breached several fundamental principles of electoral observation as recognised by the European Union for such activities², in particular by accepting to attend upon invitation of one of the political forces of the host country competing in that election, presenting itself with supportive political signalling in context of one of the contestants in said elections, and accepting financial advantages from the political party of the latter.

- (31) EL thus also contributed to an organised attempt by the currently ruling party to make the 2024 Venezuelan presidential elections appear legitimate, while the European Parliament, based on the reports of genuinely independent observers, “*Strongly condemns and fully rejects the electoral fraud orchestrated by the regime-controlled CNE*” and “*Notes that reports from international election observation missions clearly state that the Venezuelan presidential election of 28 July 2024 did not meet international standards of electoral integrity*”³. Similar concerns on the Venezuelan presidential elections of 2024 were voiced also by the High Representative for Common Foreign and Security Policy on behalf of the European Union⁴. While these specific concerns were expressed after the 2024 elections, they were entirely foreseeable for EL at the time it accepted the economic advantage from PSUV and displayed its support to that party in Venezuela, given in particular earlier reporting EU statements on elections previously organised in that country. Indeed, it was well known and already criticised by the European Parliament prior to the 2024 elections, that the official EU Electoral Observation Mission had been expelled by [REDACTED] government following its work to observe the regional and municipal elections of 2021, and that significant doubts on the regularity of the upcoming 2024 presidential elections existed following detention and arbitrary disqualification of opposition candidates.⁵
- (32) The Authority also examined the letter of [REDACTED], relied upon by EL in its comments to the Authority of 18 November 2025, and which argues that “[...] *the way in which we acted as observers, including the expenses incurred, was the only way possible on our part*”.
- (33) The Authority however underlines in this context that EL cannot refer to conditions imposed by a third country interlocutor sanctioned by the European Union, or on a political party ruling in a third country, or government departments of a third country, in order to justify acceptance of an economic advantage that is prohibited by Regulation (EU, Euratom) No 1141/2014, nor to override the scope of lawful and legitimate activities of a European political party in light of Article 10(4) of the Treaty on European Union. In the present case, even if indeed the conditions for the travel to Venezuela as implemented by EL - including travel cost relief - were imposed by PSUV

² www.eods.eu/methodology.

³ Resolution of 19 September 2024 on the situation in Venezuela (2024/2810(RSP)), https://www.europarl.europa.eu/doceo/document/TA-10-2024-0013_EN.pdf

⁴ See Statement of 10 January 2025, <https://www.consilium.europa.eu/en/press/press-releases/2025/01/10/venezuela-statement-by-the-high-representative-on-behalf-of-the-eu-on-the-events-of-10-january-2025/>

⁵ Resolution of 8 February 2024 on further repression against the democratic forces in Venezuela: attacks on [REDACTED] (2024/2549(RSP)), recital J (prior EU election observers expelled), recitals E-I (detention and arbitrary disqualification of opposition candidates), https://www.europarl.europa.eu/doceo/document/TA-9-2024-0080_EN.html

without alternative as EL alleges, it is apparent that *not* to travel to Venezuela under these conditions, and hence not to receive any economic advantage from PSUV, would have been the available compliant alternative to choose.

ii) Conclusion for Article 20(5)(d) of Regulation (EU, Euratom) No 1141/2014

- (34) EL received an economic advantage from or on behalf of PSUV for the above-indicated amount. Consequently, since PSUV, as a non-EU entity, neither is nor could be a member party of EL from which EL would be entitled to accept contributions (see Judgment of the General Court of the European Union of 25 November 2020, *ACRE v Parliament*, T-107/19), EL received a donation from a prohibited origin within the meaning of Article 20(5)(d) as read jointly with Article 2(7) of Regulation (EU, Euratom) No 1141/2014.
- (35) Since, moreover, EL did not within 30 days return this donation nor report it with a view to pay it to the Union budget in accordance with Article 20(6) of Regulation (EU, Euratom) No 1141/2014, EL accepted the prohibited donation and thus infringed the corresponding provisions.

c) Absence of corrective measures

- (36) EL did not use the opportunity to take corrective measures, as provided by the Authority in accordance with Article 29(1) Regulation (EU, Euratom) No 1141/2014 by its letter of 17 October 2025 with a deadline until 18 November 2025.
- (37) More particularly, EL did not implement, nor even offer, any measure to remedy the infringement of Article 20(5)(d) of Regulation (EU, Euratom) No 1141/2014 and pursuant to Article 29(2) of Regulation (EU, Euratom) No 1141/2014. The Authority therefore was required to decide the appropriate sanction in accordance with Article 27 thereof.

d) Type and amount of sanction

- (38) In accordance with Article 27(2)(b)(i) of Regulation (EU, Euratom) No 1141/2014, a financial sanction for a quantifiable infringement applies in case of non-compliance with Article 20(5) thereof. As read jointly with Article 27(4)(b) of Regulation (EU, Euratom) No 1141/2014, its amount shall be 100% of the irregular sums received.
- (39) EL reported to the Authority expenses related to this activity of EUR 673.20. According to publicly available information on 2024 prices, travel costs per person from Europe to Venezuela amounted to at least EUR 480 for a return flight, and a night in a simple hotel accommodation at least EUR 30 per person.
- (40) The economic advantage received from Venezuela amounts to the difference between the payment made by EL for its delegation and the real cost of travel (Europe-Venezuela and back) and accommodation (at least 2 nights), i.e. a minimum of EUR 3 106.80 (= 7x480 + 7x60 ./. 673.20).

e) Other consequences

- (41) The present sanction is without prejudice to any decisions or measures of the authorising officer of the European Parliament or of competent national authorities, in their respective remits.
- (42) In accordance with Article 32(1)(g) of Regulation (EU, Euratom) No 1141/2014, the details of and reasons for this decision shall be made public on a website created for that purpose, having due regard to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/CE (OJ L 295, 21.11.2018, p. 39).

FINANCIAL SUPPORT TO AN ACTIVITY ON HAITI IN THE HEADQUARTERS OF A PARTY AT NATIONAL LEVEL IN FRANCE

FACTS AND PROCEDURE

- (43) On 2 February 2024 from 18:00, an activity entitled “Soirée Haïti et sa révolution” took place at “Espace Niemeyer”, a part of the headquarters of PCF⁶, in Paris, France. This activity was described by EL as *“Conference, art exhibition, dance and music show on the occasion of the 220th anniversary of Haitian independence at PCF headquarters in Paris with the participation of Haitian diaspora, Haitian trade union and social forces and the Tricontinental Centre”*.
- (44) The event was moderated by [REDACTED], presented as “*membre de la direction nationale du PCF*”. It opened by an intervention entitled “*Histoire et significations internationales de la révolution haïtienne*” by [REDACTED], referred to as “*membre de l’exécutif national du PCF, chargé des relations internationales*”. [REDACTED] position as vice-president of EL was not mentioned in this context, or otherwise visible. The introduction was followed by an intervention by [REDACTED], politologue, docteur en science politique, professeur à l’Institution Saint-Marie d’Anthony, with the title “*Histoire et significations internationales de la révolution haïtienne*”. A round table discussion followed with the title “*D’hier à aujourd’hui : comment la révolution haïtienne résonne dans les luttes d’émancipation actuelles des peuples?*”, which included speakers of State bodies and civil society relating to Latin America/Caribbean in France (Embassy of Colombia, Embassy of Haiti, France-Haiti associations) together with [REDACTED], referred to in the programme as “*responsable des relations internationales du PGE*”. This was followed by a music and dance performance and catering. EL’s logo was absent during the entire event at the venue: There was no EL-labelled poster or lectern, nor any scene background or stand displaying EL’s logo.
- (45) The event was announced on a dedicated page on the website of PCF⁷ with the following text: “*Il y a 220 ans, le 1er janvier 1804, triomphait la Révolution haïtienne.*”

⁶ <https://espace-niemeyer.fr/le-siege-du-pcf/>

⁷ https://www.pcf.fr/soiree_haiti_et_sa_revolution

En conquérant son indépendance, en brisant les chaînes de l'esclavage et du colonialisme et en établissant la première République noire, le peuple haïtien changeait la face du monde et écrivait l'histoire. Dans les Caraïbes, dans les Amériques, en Afrique, mais aussi en Europe, la victoire du peuple haïtien a constitué, et représente encore aujourd'hui, un symbole pour tous les peuples en lutte pour leur émancipation. Toutefois, dès le départ, la souveraineté d'Haïti a été niée, par les interventions extérieures, les dictatures, ou encore l'étau de la dette et le peuple haïtien voit actuellement ses droits les plus élémentaires bafoués. Dès lors, 220 ans après la Révolution, comment poursuivre la lutte pour la souveraineté et l'émancipation ?”.

- (46) The event page on the PCF website contains a large logo of PCF on the top left, as well as a poster with an artistic work and the title of the event, without any logos, on the top centre. EL's logo is visible in relation to that event when zooming into a programme document that is embedded in the lower part of the above-mentioned page, accessible after scrolling down, below the above-quoted text. On that programme, which EL claims was also used as an invitation, EL's logo is the same size as one of PCF to its right, as well as multiple logos of private entities such as “Rhum Store” and “Pro Mart Haïti”, to its left. In the Facebook post of PCF of 9 February 2024 that followed the event, there is no logo of, nor other reference to EL visible on the photos published. The accompanying text of the post comprises the title “*Belle et forte soirée pour célébrer les 220 ans de l'indépendance d'Haïti, vendredi 2 février 2024 au siège du PCF - Parti Communiste Français*”, followed by a summary of the event focusing on “*solidarité avec les luttes actuelles du peuple haïtien*”. The post ends by the following list: “*Pafha France-Haïti Collectif Haïti de France European Left Ambassade de la République d'Haïti en France Consulat Général D'Haïti, [...], Academi art*”.
- (47) EL indicated in its submissions to the Authority of 27 June 2025 and 25 July 2025 that EL's costs regarding this activity amounted to EUR 3 417.33 out of total costs of EUR 5 500.
- (48) By email of 12 September 2025 the Authority requested the following additional information: “*i. materials, handouts distributed during the activity; ii. photographs taken during the activity*”.
- (49) EL replied in its email of 19 September 2025:
- “a. There were no specific handouts/materials distributed during the activity apart from the programme being available online. We had sent the programme already in the original sendout and resend it again here.*
- b. We had also sent already pictures but we are doing it again in this sendout through the links as well as pictures themselves.”*
- (50) An attachment to EL's email of 19 September 2025 contained 10 photographs of the activity, a flyer announcing it and a programme setting out the main topics and a list of speakers. The flyer described the activity as “*Histoire, débat et interludes artistiques tambours, danse, exposition de peintures, buffet haïtien et dégustation de rhum*”. The photographs show images of the activity, including speakers on a stage, panels, attendants and other persons, including musicians. One of the photographs shows [REDACTED], who is vice-president of EL, but who was referred to in the programme without EL reference, as “*membre de l'exécutif national du PCF, chargé des relations internationales*”.

Opening of investigation, right to be heard and opportunity to take corrective measures

- (51) By letter of 17 October 2025, the Authority informed EL to have opened an investigation concerning the activity and provided a summary of available facts, as well as an interim assessment indicating that, on the basis of the available facts, the financing provided for activity by EL constituted an infringement of Article 22(1) of Regulation (EU, Euratom) No 1141/2014.
- (52) The Authority gave EL the opportunity to comment until 18 November 2025 and to take appropriate corrective measures to remedy the situation pursuant to Article 29(1) of Regulation (EU, Euratom) No 1141/2014 until the same date.
- (53) In its reply to the Authority of 18 November 2025, EL provided the following written statement:
- "You will find a signed letter by [REDACTED], who was also a speaker in the Haiti-event you are referring to, albeit not as EL but as PCF, where he explains the connection of the event to matters of the EU's interest. Attached to this letter you will also find his intervention for the closing of this event. We have also received the final global budget for the event from our member party PCF from which it can be visible that our share was lower than originally reported and thus our representation was indeed more in line with what we spent for the event. We take stock, as you did, that there was not a complete absence of our logo for the event; we had our logo in the online programme and invitation - which was key for the participants to come - and we had one out of four speakers at the event present. Also, with the documents attached, the context in connection with the EU's interests is showcased."*
- (54) EL further submits that: *"In light of these facts we deem it excessive to declare 100% of our spent amount ineligible. As said before, we acknowledge that one particular element was missing, so indeed we are taking this investigation as lesson learnt to further improve our reporting standards towards you by a more rigorous double-check with all cofinancing partners whether our last global budget overview is also the most updated one"*.
- (55) In its reply to the Authority of 18 November 2025, EL provided a sheet entitled *"Haiti et sa révolution 02/02/2024 Budget plan"* containing new figures relating to the budget of the activity. The sheet indicates expenses of EL of (i) EUR 1 880 for *"Traiteur + Exposition + Performance"*, and (ii) EUR 1 537.33 for *"Dépenses voyage (1 intervenante + 1 staff)"* with a total of EUR 3 417.33. Concerning PCF, the sheet indicates *"traiteur EUR 2 880"* and a total of EUR 7 750 for *"Mise à disposition des locaux"* including *"Coupole"* (EUR 5 100) and *"cafeteria"* (EUR 2 650) with a total amount of EUR 8 750. According to this document, PCF would account for EUR 1 000 out of the total cost of EUR 2 880 for *"traiteur"*. The total cost of the activity and all other accumulated expenses by PCF and EL would, according to this new document, amount to EUR 12 167.33. It should be noted, however, that the latter amount includes EUR 7 750 allegedly borne by PCF for the venue at *"Espace Niemeyer"*, which however is part of PCF's own headquarters.

- (56) EL's reply to the Authority of 18 November 2025 included a letter [REDACTED] to [REDACTED] dated 17 November 2025 with the following content:
"Je me permets de vous adresser ce courrier afin de partager avec vous les perspectives issues de la conférence « Haïti et sa révolution », et d'en souligner la portée significative pour les politiques de l'Union européenne. Cet événement a réuni notamment [REDACTED] [REDACTED] du collectif citoyen Haïti-France, ainsi que [REDACTED] au ministère des Affaires étrangères et des Cultes de la République d'Haïti. Cette rencontre nous a permis de mettre en lumière des enjeux essentiels qui interpellent l'Union européenne. L'Union européenne possède une délégation en république d'Haïti. Le contenu des relations actuelles entre l'UE et la république d'Haïti est formalisé dans le cadre de l'accord global de l'Union européenne avec les pays Afrique-Caraïbes-Pacifique (ACP), dit accord de Cotonou, conclu en 2000 et renégocié en 2021. Le Parlement européen s'est positionné sur la situation en Haïti fin 2019. Mais à la suite des évolutions de la situation politique, le Parlement européen a adopté une résolution sur la situation en Haïti, le 20 mai 2021. Un appel de députés européens concernant la situation en Haïti a été publié par le journal « L'Humanité » le 2 juillet 2021. Au-delà de la commémoration du bicentenaire de la révolution haïtienne, les différents intervenants ont pu réinterroger les politiques de l'UE et d'un certain nombre d'États membres, notamment la France, envers Haïti. La conférence de février 2024 nous avait permis de nouer un dialogue direct avec des actrices et acteurs haïtiens, mettant en lumière l'importance cruciale d'une main tendue de l'UE pour construire des partenariats fondés sur le codéveloppement et la réalisation des Objectifs de développement durable. La France et l'Union européenne disposeraient là d'une incontournable opportunité pour agir dans le sens du droit, en rompant une fois pour toutes avec le mythe de la prétendue « ingouvernabilité » d'Haïti, entretenu de longue date."
- (57) EL's submission of 18 November 2025 included a transcript of [REDACTED] intervention during the activity. In this intervention, [REDACTED] addressed the relevance of the Haitian revolution for the development of the Haitian people and the country's role in the world. The text further addresses the living conditions of the Haitian population and the possible causes. In his intervention, [REDACTED] also argued:
"Il y a urgence d'une autre politique de la France et de l'UE. Le ministère des Affaires Etrangères et de l'Europe décrit ainsi sur son site les relations franco-haïtiennes : « Proches par une langue et une histoire partagées, voisins par la présence des collectivités françaises d'Amérique, Haïti et la France entretiennent des liens étroits d'amitié et de solidarité ». Mais de quoi parle-t-on ?" and "Education, santé... ce sont quelques uns des liens qui unissent ces deux pays mais qui peuvent, à travers la réalisation des Objectifs de Développement Durable de l'ONU, unir nos relations entre l'UE et Haïti, et au-delà toute l'Amérique Latine".
- (58) In its reply of 18 November 2025, EL did not indicate that it recovered the financial support provided, nor that it had taken or was proposing any other remedial action.

ASSESSMENT OF THE FACTS IN LIGHT OF THE LEGAL FRAMEWORK

- (59) Article 22(1) of Regulation (EU, Euratom) No 1141/2014 provides that “*the funding of European political parties from the general budget of the European Union or from any other source shall not be used for the direct or indirect funding of other political parties, and in particular national parties or candidates.*”
- (60) Article 27(2)(b)(ii) of Regulation (EU, Euratom) No 1141/2014 further provides that:
- “2. The Authority shall impose financial sanctions in the following situations: [...]
- (b) quantifiable infringements: [...]
- (ii) in the event of non-compliance with the requirements laid down in Articles 21 and 22.”
- (61) Article 29(1) and (2) of Regulation (EU, Euratom) No 1141/2014 provide that:
- “1. Before taking a final decision relating to any of the sanctions referred to in Article 27, the Authority or the Authorising Officer of the European Parliament shall give the European political party or the European political foundation concerned an opportunity to introduce the measures required to remedy the situation within a reasonable period of time, which shall not normally exceed one month. In particular, the Authority or the Authorising Officer of the European Parliament shall allow the possibility of correcting clerical and arithmetical errors, providing additional documents or information where necessary or correcting minor mistakes.
2. Where a European political party or a European political foundation has failed to take corrective measures within the period of time referred to in paragraph 1, the appropriate sanctions referred to in Article 27 shall be decided.”

a) Introductory remarks on the regulatory framework

- (62) It follows from Article 22(1) of Regulation (EU, Euratom) No 1141/2014 that the funding of European political parties from the general budget of the European Union or from any other source shall not be used for the direct or indirect funding of other political parties, and in particular national parties or candidates.
- (63) Concerning indirect funding, it should be recalled that granting an advantage of any kind to a national political party, without that party bearing the cost, constitutes indirect funding of the latter’s activities (see the Judgment of the General Court of 27 November 2018, *MENL v Parliament*, T-829/16, EU:T:2018:840, para 72). Such indirect funding occurs when the national party obtains a financial advantage, even though there is no direct transfer of funds, for example if the national party saves on expenses which would otherwise be due (*Ibid.*). For the purposes of that assessment, reference should be made to a range of elements, in particular geographic and time elements, and elements concerning the content of the financed measure (*Ibid.*, at para 83, and Judgment of the General Court of 7 November 2019, *ADDE v Parliament*, T-48/17, EU:T:2019:780, para 71).

- (64) The assessment under Article 22(1) of Regulation (EU, Euratom) No 1141/2014 does not depend on whether parties are - or are not - members of, or otherwise affiliated to, the European political party in question. Direct or indirect funding of all parties is prohibited regardless of whether they are members or not, whether they are at European or national level, or whether they are inside or outside the European Union, as also confirmed by recital 28 of Regulation (EU, Euratom) No 1141/2014.
- (65) It additionally follows from Article 22(1) of Regulation (EU, Euratom) No 1141/2014 as read jointly with Article 27(2)(b)(ii) thereof that “intent” or the absence thereof is not a relevant factor for the question of whether the Authority shall sanction an infringement of Article 22(1) of Regulation (EU, Euratom) No 1141/2014. Regulation (EU, Euratom) No 1141/2014 only contains one reference to intentional conduct, in Article 27(2)(a)(vi) thereof, which is however not relevant in the present case.
- (66) By virtue of Article 288 of the Treaty on the Functioning of the European Union, Regulation (EU, Euratom) No 1141/2014 is a binding and directly applicable legal act of the Union. Its legal effect is not dependent on guidance from the Authority. Nonetheless, the Authority has provided guidance on circumstances of practical relevance, both publicly and in communications directly to the European political parties and foundations, which consistently recalled that joint activities with parties or foundations at national level were not prohibited *per se*, but that there are limitations in this respect. More specifically, the letter of the Authority to all European political parties and foundations of 30 November 2022, under the sub-title “*Designing joint activities with an appropriate financing share - ‘Payer in the driver seat’*” stated concerning Article 22 of the said regulation that “[...] *the provision requires European political parties to ensure that such activities do not result in indirect funding of another party (Article 22(1) of the Regulation), and in the case of European political foundations that such activities do not result in indirect funding of a party or another foundation (Article 22(2) of the Regulation)*”. The letter further stated that visibility, the level of ownership of the substance and a co-financing share reflecting the actual overall involvement by the European political party or European political foundation as compared to the parties or organisations at national level were relevant factors in determining compliance. The letter added that “[...] *the higher the share of a joint activity financed by the European political party or European political foundation, the higher the influence of the European political party or European political foundation on the activity in question must be, both in terms in visibility and in substance*”. The letter also recalled that such guidance is “[...] *not exhaustive and that the Regulation remains the legal yardstick in any event*”. Also, it should be noted in this context that a prudent entity could be expected to understand the concept of indirect funding even in absence of specific guidance (see the Judgment of the General Court of 27 November 2018, *MENL v Parliament*, T-829/16, EU:T:2018:840, para 72).

b) Application to the facts of the case

i) Funding by EL of a political party at national level

- (67) The activity “*Haïti et sa révolution*” held on 2 February 2024 in Paris, France, at “Espace Niemeyer” appears to the onlooker as an event of PCF. This follows, firstly, from the event venue which forms part of the national headquarters of the *Parti communiste français* (PCF). Secondly, EL was neither present with a poster, lectern

labelling, stand or scene display. By contrast, thirdly, the moderator was designated as a PCF representative and the introductory presentation was given by a person described as a leading PCF member. In light thereof, the logo of EL on a programme document, between private entities and PCF's logo and no bigger than those, accessible online on the event page of PCF below a large PCF logo, and only when zooming in after scrolling below the explanatory text of the event, does not change this overall impression. This is all the more the case since no material link can be established by the reader between the logos of "Rhum store" and other private entities shown alongside EL, and any role as a co-organiser, even less a co-host of the event. This absence of meaningful visibility for EL is further reinforced by PCF's social media post of 9 February 2024, which is under the title "*Belle et forte soirée pour célébrer les 220 ans de l'indépendance d'Haïti, vendredi 2 février 2024, au siège du PCF*". The appearance of the name of EL quoted among associations and an embassy at the very end of that post, without being in any way emphasised in relation to PCF or others present, merely confirms the fact that EL enjoyed no relevant visibility, and that the event was perceivable as one of PCF alone.

- (68) Also in substance, the topics discussed lack relation with EU-specific matters and, additionally, any sort of perceivable EL influence on content and scope of the event. Based on the materials available, EU policies or related perspectives were not discussed during the activity. [REDACTED] intervention contains marginal, high-level reference to the EU, but in the context of French foreign policies. The EU, or EU policies toward Haiti, or the impact of the situation in Haiti on the EU, or a desire to change current EU policies in a democratic process, are not mentioned in their own right. The event, to the contrary, was focused on Haitian local culture, politics, sociology and economics, as well as, as PCF's social media post indicates, "*solidarité avec les luttes actuelles du peuple haïtien*". Moreover, in any event, no speech or other form of self-standing agenda point by or on behalf EL has occurred at the event. In particular, the presence [REDACTED] is not that of 'one out of four speakers at the event' as EL alleges in its reply of 18 November 2025: she was merely one of the participants to a round table alongside multiple Latin America/Caribbean-specific participants (Embassy of Haiti, Embassy of Colombia, Haiti associations in France...). This round table followed self-standing speeches of PCF and an academic with their own agenda points, and moreover overall moderation of PCF accompanied the event as a whole. Thus, even assuming that the acronym label "PGE" next to [REDACTED] name on the programme allowed for a sufficiently understood and hence perceivable link of her presence to EL, EL's relation to the substance of the event is so marginal and subordinate that it does not convey any relevant co-ownership of the activity next to PCF, as would e.g. identifiable agenda setting on European topics, keynote speech, introduction, conclusion, or other forms of content influence traceably attributable to the European political party.
- (69) The further explanations provided by EL on 18 November 2025 are not capable of modifying this assessment. More particularly, the fact that, in abstract, Haiti could have a bearing on EU policies, or that the EU is represented in Haiti, or that the European Parliament has passed resolutions on Haiti as is argued by [REDACTED], does not change the nature of this particular event where such bearing on or by the EU was neither a thematic aim, nor *de facto* explored. To hold otherwise would mean that any event organised by a political party at national level, if relating to local politics of any third country, could be financed by a European political party, provided only that the EU

maintains diplomatic relations with that country or that the European Parliament adopted a resolution on it - evidently this is not a convincing proposition, as the prohibition to fund indirectly parties at national level would then become devoid of any effect at third country-related events.

- (70) According to EL's submissions, EL made available EUR 3 417.33 for the activity, including (i) EUR 1 880.00 as a contribution to the costs for the catering provided and (ii) travel cost of EUR 1 537.33 for two persons. The remainder of the costs was, according to the information provided by EL, borne by PCF. According to the document most recently submitted by PCF, entitled "*Haiti et sa révolution 02/02/2024 Budget plan*", the total costs of the activity amounted to EUR 12 167.33.

ii) Conclusions for Article 22(1) of Regulation (EU, Euratom) No 1141/2014

- (71) EL lacked relevant visibility and any ownership of the activity. For this reason, the relation between the contribution of EL and the share provided by PCF loses its significance: *any* contribution provided by EL for the event effectively financially benefited PCF as this was, in substance, a PCF event on Haiti. It therefore remains irrelevant for the purposes of this decision whether expenses allegedly borne by PCF for a venue in its own headquarters legitimately can be regarded as part of PCF's cost share toward the activity. The revised figures provided by EL on 18 November 2025 in reply to the right to be heard thus in any event do not change the conclusion.
- (72) In light of the above, an infringement of Article 22(1) of Regulation (EU, Euratom) No 1141/2014 is established, because any and all financial means provided by EL for the activity in question benefited PCF by relieving it of cost for its event, and thus amounted to indirect funding of PCF.

c) Absence of corrective measures

- (73) EL did not use the opportunity to take corrective measures, as provided by the Authority in accordance with Article 29(1) Regulation (EU, Euratom) No 1141/2014 by its letter of 17 October 2025 with a deadline until 18 November 2025. More particularly, EL did not recover any amount from PCF in relation to the activity, nor did it implement or even offer any other measure to remedy the infringement of Article 22(1) of Regulation (EU, Euratom) No 1141/2014.
- (74) Pursuant to Article 29(2) of Regulation (EU, Euratom) No 1141/2014, the Authority therefore was required to decide the appropriate sanction in accordance with Article 27 thereof.

d) Type and amount of sanction

- (75) In accordance with Article 27(2)(b)(ii) of Regulation (EU, Euratom) No 1141/2014, a financial sanction for a quantifiable infringement applies in case of non-compliance with Article 22 thereof. As read jointly with Article 27(4)(b) of Regulation (EU, Euratom) No 1141/2014, its amount shall be 100% of the irregular sums received.

- (76) Hence, the sanction amount following from Article 27(4)(b) of Regulation (EU, Euratom) No 1141/2014 as applied to infringements of Article 22 thereof is the nominal amount of the funding provided by EL toward the activity.
- (77) The amount of expenses that EL reported to the Authority in relation to this activity is EUR 3 417.33, which includes an amount of EUR 1 537.33 relating to travel costs for two participants therein. Given the nature of these latter cost items which are detachable from the financial support provided to the event as such, the corresponding amount is not included in the amount to be taken into account under Article 27(4)(b) of Regulation (EU, Euratom) No 1141/2014. The amount to be taken into account for the determination of the sanction level is therefore EUR 1 880.

e) Other consequences

- (78) The present sanction is without prejudice to any decisions or measures of the authorising officer or of the competent national authorities, in their respective remits.
- (79) In accordance with Article 32(1)(g) of Regulation (EU, Euratom) No 1141/2014, the details of and reasons for this decision shall be made public on a website created for that purpose, having due regard to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/CE (OJ L 295, 21.11.2018, p. 39).

HAS ADOPTED THIS DECISION:

Article 1: Sanction for accepting a donation from a third country

1. A financial sanction shall be imposed on the Party of the European Left in accordance with Article 27(2)(b)(i) of Regulation (EU, Euratom) No 1141/2014.
2. For the purposes of the first paragraph, the applicable sanction amount shall be EUR 3 106.80.

Article 2: Sanction for funding of a political party at national level

1. A financial sanction shall be imposed on the Party of the European Left in accordance with Article 27(2)(b)(ii) of Regulation (EU, Euratom) No 1141/2014.
2. For the purposes of the first paragraph, the applicable sanction amount shall be EUR 1 880.

Article 3

The Party of the European Left, Square de Meeûs 25, 1000 Brussels (Belgium), is the addressee of this decision.

Article 4

The text of this decision shall be published on the website of the Authority after redacting the names of the natural persons that appear in it.

Article 5

This decision shall take effect on the day of its notification to the Party of the European Left.

Done at Brussels, on 4 December 2025.

*For the Authority for European Political Parties and
European Political Foundations*

The Director

Pascal Schonard

The attention of the Party of European Left is drawn to Article 35 of Regulation (EU, Euratom) No 1141/2014:

'Right of appeal

Decisions taken pursuant to this Regulation may be the subject of court proceedings before the Court of Justice of the European Union, in accordance with the relevant provisions of the TFEU.'