

EUROPEAN PARLIAMENT AND COUNCIL: PROVE YOUR COMMITMENT WITH A STRONG ANTI-CORRUPTION DIRECTIVE

Open letter from 57 civil society organisations

2 June 2025

To: Minister of Justice Mr. Adam Bodnar, Polish Presidency of the Council of the European Union

Mr. Javier Zarzalejos, MEP, Chair of the Committee on Civil Liberties, Justice and Home Affairs of the European Parliament

Cc: Commissioner Mr. Michael McGrath, Democracy, Justice, the Rule of Law and Consumer Protection, European Commission

Cc: Ms. Raquel García Hermida-Van Der Walle, MEP, Rapporteur on the directive on combatting corruption, European Parliament

Dear Minister Bodnar, dear Mr. Zarzalejos MEP,

We write to you at a pivotal moment in the EU's fight against corruption. As interinstitutional negotiations on the EU's anti-corruption legislative package reach a critical stage, we 57 civil society organisations from across the EU urge you to preserve and strengthen the bold amendments proposed by the European Parliament in February 2024. How the co-legislators choose to proceed on many of the critical issues advanced by the proposals will reveal whether the bloc is truly committed to combatting and preventing corruption across the Union. The EU can demonstrate real commitment, and not miss a historical opportunity, by showing leadership in the fight against corruption.

It is essential that the Council take this unique opportunity to push back against the emerging narrative of a lack of commitment to tackling corruption. Transparency International's 2021 survey¹ showed that only 21 per cent of EU residents believed that officials often face appropriate penalties for corruption, while 53 per cent said their government is run by a few big interests looking out for themselves. In the most recent Corruption Perceptions Index,² the average score across all member states [fell by the highest amount since 2015](#). These concerns have been reinforced by recent controversies in the bloc such as [Qatargate](#) and the [Huawei scandal](#). Amid global challenges, this is no time for half-measures. Every Member State has a responsibility to respond decisively to corruption risks, by building on – not weakening – the stance taken by the European Parliament.

¹ Global Corruption Barometer (2021) <https://www.transparency.org/en/news/gcb-eu-2021-survey-people-worry-corruption-unchecked-impunity-business-politics>

² Corruption Perception Index (2024) <https://www.transparency.org/en/cpi/2024> ; Eurostat https://ec.europa.eu/eurostat/databrowser/view/sdg_16_50/default/table

The European Parliament demonstrated real ambition in [its amendments put forward in February 2024](#) and it is crucial that they uphold the adopted position. Many of these proposals are not new to the bloc as they are already used by various member states. The co-legislators should take the opportunity to raise the bloc's legislative floor from tried and tested approaches from across the Union.

To strengthen enforcement, Transparency International has [identified key elements](#) that must be included in the final text. Among other issues, we strongly urge that the Directive includes:

1. an effective *failure to prevent* offence for legal persons in line with international best-practice from the UK, Australia and other countries;
2. the establishment of an effective and transparent framework on the use of non-trial resolutions with legal persons;
3. an article on the rights and remedies for victims of corruption, including an obligation to apply the Victim's Rights Directive to victims of corruption; and
4. an obligation to ensure that civil society organisations can represent the public interest as qualified representatives in criminal proceedings, in line with existing EU law on representative actions, as well as in line with long-standing EU law in the field of consumer-protection, environmental protection and anti-discrimination.

These changes would enable Member States to better tackle the most serious acts of corruption when they occur and provide justice for the victims.

Enforcement against acts of corruption must also be met by an equal commitment to stopping it before it occurs. We strongly urge you to put in place meaningful tools to prevent corruption across the Union to ensure no one country can be seen as a weak link. The co-legislators should ensure the Directive includes tools such as:

1. effective rules for the periodic and risk-based disclosure, verification and publication of assets and interests of public officials;
2. access to information of public interest in open data formats;
3. effective transparency of financial information of political parties, candidates and other third parties seeking to influence election outcomes, including rules to facilitate the timely reporting audit;
4. establishing minimum required information to be publicly disclosed in regard to the interaction between public officials and persons or private entities carrying out interest representation, including the proactive publication of lobby meetings.

The cost of enforcing against corruption can reduce over time if these ideas are successfully implemented to disincentivise and deter corrupt actors.

This is a pivotal moment for ministers and EU policymakers to show they are ready to respond to citizens' concerns. Your institutions have the power to set anti-corruption standards that resonate beyond the EU. A strong Directive not only reaffirms your commitment to tackling corruption across the Union but also proves you are seizing this political moment to confront a barrier that is undermining the bloc's ability to meet global challenges.

Thank you for your consideration,

Signatories

1. Transparency International EU
2. Transparency International Netherlands
3. Akademia Antykorupcyjna (Poland)
4. Netherlands Helsinki Committee
5. The Good Lobby Italia
6. Transparency International Ireland
7. Transparency International Spain
8. Open Contracting
9. Daphne Caruana Galizia Foundation (Malta)
10. Action Aid Italia
11. GONG (Croatia)
12. Integrity Initiatives International Europe (Netherlands)
13. La Strada International (Netherlands)
14. Transparency International Austria
15. Transparency International Anticorruption Center (Armenia)
16. Transparency International Belgium
17. Transparency International Bosnia and Herzegovina
18. Transparency International Bulgaria
19. Transparency International Denmark
20. Transparency International Finland
21. Transparency International France
22. Transparency International Germany
23. Transparency International Greece
24. Transparency International Hungary
25. Transparency International Italy
26. Transparency International Macedonia
27. Transparency International Portugal
28. Transparency International Romania
29. Transparency International Slovakia
30. Transparency International Sweden
31. Transparency Serbia
32. Kosovo Democratic Institute - TI Kosovo
33. Whistleblower-Netzwerk e.V., Germany
34. Civic Alliance, Montenegro
35. Albanian Institute of Science AIS
36. Altro Modo Flegreo APS (Italy)
37. Apincittà aps (Italy)
38. ATTIVANZA-ETS (Italy)
39. Associazione Italiana Turismo Responsabile
40. BASTA! asbl / vzw, Belgium
41. Cittadini per l'aria onlus (Italy)
42. Comitato No Ovovia (Italy)

43. Entretodos - Associação Portuguesa de Parcerias para o Desenvolvimento Social (Portugal)
44. Equo Garantito (Italy)
45. Freedom For Eurasia (Austria)
46. Give Back Giovani Aree Interne (Italy)
47. il Movimento Nazionale Liberi Farmacisti (Italy)
48. Institute for Democracy and Mediation (Albania)
49. Isde, Associazione Medici per l' ambiente (Italy)
50. Maine Tese (Italy)
51. Partners Albania for Change and Development (Albania)
52. Parliament Watch (Italy)
53. Pro Bono Italia ETS
54. Red Nova (Italy)
55. Repubblika (Malta)
56. Rete AOI ETS (Italy)
57. Rinascimento Green (Italy)