

EU Money Monitor

From: EPPO Press <EPPO-Press@epo.europa.eu>
Sent: Wednesday, 10 June 2026 13:13
To: EU Money Monitor
Subject: RE: (!) Formal journalistic notification | Belgium NGO Funding Intelligence Pack, April 2026 | Four documented findings under EPPO Regulation (EU) 2017/1939, PIF Directive (EU) 2017/1371, and College Decision 063/2023 | Written position requested

Dear Ms Păduraru,

The EPPO has examined your request for information received by the EPPO on 17/04/2026. Before replying to your individual questions, I would like to first clarify the scope of the legal framework for public access rights under Union law, since you are referring to the reply of the EPPO Legal Service to your initial application for public access to documents with Ref. no. PA/2025/10/06/143.

As the Legal Service already explained, Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents applies to and the right of public access to documents under it covers only existing 'administrative documents', including statistics, and does not extend to 'operational documents' of the EPPO, i.e. from individual proceedings: Article 109 of the EPPO Regulation exempts the latter from access rights based on Regulation (EC) No 1049/2001.

Documents relating to EPPO's assessment of private party reports fall within that category of documents that are exempted from public access rights. Thus, in its reply, the EPPO Legal Service had to conclude that there were no existing documents to disclose as per your request within the meaning of Regulation (EC) No 1049/2001.

This is the reason why the Legal Service stated that the EPPO was not able to identify existing documents within the meaning of your public access request that EPPO could disclose under the framework of public access rights. By no means should this be interpreted as EPPO not having documented individual reasoning relating to every private party report submitted to the EPPO and treated by it.

Moving to your first question, I would first like to stress that the EPPO carries out an assessment of reports submitted by private parties on the basis of its material, territorial, temporal and personal competence, in accordance with the relevant provisions of the EPPO Regulation, notably Recital 49 and Articles 22, 23, 24 and 25. These provisions govern the EPPO's material competence, territorial and personal competence, the reporting, registration and verification of information, as well as the exercise of the EPPO's competence.

As previously stated, in accordance with the EPPO Regulation and the principle of mandatory competence (or, as the EPPO Regulation refers to it, principle of legality in prosecution), the EPPO is obliged to open a criminal investigation every time that a report, regardless of whom it comes from, contains sufficient elements to conclude that a criminal offence falling within our competence is being, or has been committed.

In its reply to public access request PA/2025/10/06/143, the EPPO Legal Service did not confirm the absence of assessment and documented reasoning relating to the private party reports submitted to the EPPO. The EPPO Legal Service's examination under the public access and transparency legal framework, was confined to identifying whether documents existed that could be disclosed to you

upon your public access request. After this examination, the Legal Service had to conclude that there were none.

As far as public accountability is concerned, I would like to draw your attention to Articles 6(2), 7 and 109 of the EPPO Regulation. According to Article 6(2), “[t] EPPO shall be accountable to the European Parliament, to the Council and to the Commission for its general activities, and shall issue annual reports in accordance with Article 7”. Furthermore, under Article 7(2), the European Chief Prosecutor “[...] give account of the general activities of the EPPO, without prejudice to the EPPO’s obligation of discretion and confidentiality as regards individual cases and personal data [...]”. It is clear that from those Articles that the principle of public accountability relates to the EPPO’s general activities. It cannot be relied on to obtain information about individual cases. This would infringe EPPO’s obligation of discretion and confidentiality.

Concerning the development and publishing of the criteria of mandatory competence for Belgium and for all Member States, we already explained that the EPPO carries out an assessment in accordance with the relevant provisions of the EPPO Regulation. Furthermore, as is clear by the applicable Private Parties Policy already communicated to you, there are no distinct criteria for Belgium or for any Member State. The same criteria apply for all Member States when assessing reports submitted from Private Parties. Moreover, the EPPO does not intend to publish more detailed criteria, for reasons of confidentiality and in order to protect the integrity of its investigations.

Moving to your second question, and as already explained above, the EPPO Legal Service did not confirm the absence of assessment and documented reasoning relating to the private party reports submitted to the EPPO. The reply of the EPPO Legal Service to your initial application for public access to documents was correct. Additionally, as mentioned in the EPPO Legal Service’s reply, you had the possibility to make, within 30 working days from receipt of the reply, a confirmatory application to the European Chief Prosecutor. Since no confirmatory application had been made in this time-limit, the initial decision of the EPPO Legal Service is final.

Regarding the existence of logs, please let me clarify that the assessment of reports submitted by private parties is carried out in accordance with the applicable Private Parties Policy. Logs concerning decisions taken on each private party’s report are retained for a period of three years, in line with the [Rules concerning the Processing of Personal Data, as adopted by Decision 009/2020 of the College of the EPPO of 28 October 2020 and as amended by Decision 037/2023 of the College of the EPPO of 7 June 2023](#).

Turing to your third and fourth questions, that should be answered together, I would first like to emphasise that the EPPO is the independent prosecution office of the European Union, which investigates and brings to justice crimes against the financial interests of the EU. As a prosecution office, the EPPO investigates individual criminal conduct and assesses whether it is competent to do so in accordance with the EPPO Regulation. When assessing reports submitted by private parties, the Private Parties Policy is applicable. In contrast, the EPPO is not competent to audit, prevent or detect potential structural conditions and irregularities in the granting process. It is further not an administrative or audit body, and does not act based on a risk-oriented approach.

I hope you find these replies useful.

Kind regards,
Tine Hollevoet



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From: EPPO Press <EPPO-Press@epo.europa.eu>

Sent: 28 April 2026 16:27

To: EU Money Monitor <watch@brussels-leaks.eu>

Cc: EPPO Press <EPPO-Press@epo.europa.eu>

Subject: FW: (!) Formal journalistic notification | Belgium NGO Funding Intelligence Pack, April 2026 | Four documented findings under EPPO Regulation (EU) 2017/1939, PIF Directive (EU) 2017/1371, and College Decision 063/2023 | Written position requested

Importance: High

Dear Ms Păduraru,

We hereby acknowledge receipt of your request for access to information concerning the European Public Prosecutor's Office (EPPO), received by the EPPO on 17/04/2026.

Your request will be treated in accordance with the Decision of the College of the EPPO of 7 April 2021 on the Code of Good Administrative Behaviour. We will gather the available information to your different questions and will revert back to you as soon as possible.

Kind regards,
Tine Hollevoet



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From: EU Money Monitor <watch@brussels-leaks.eu>

Sent: 17 April 2026 10:59

To: EPPO Press <eppo-press@eppo.europa.eu>; EPPO Info <info@eppo.europa.eu>; EPPO Press <press@eppo.europa.eu>

Subject: (!) Formal journalistic notification | Belgium NGO Funding Intelligence Pack, April 2026 | Four documented findings under EPPO Regulation (EU) 2017/1939, PIF Directive (EU) 2017/1371, and College Decision 063/2023 |

Written position requested

Importance: High

For the attention of:

Ms Laura Codruța Kövesi, Chief Prosecutor, European Public Prosecutor's Office (EPPO)

Your excellency, Chief Prosecutor Kövesi,

Please find attached formal journalistic notification EUMM-EPPO-2026-005, addressed to the European Public Prosecutor's Office by EU Money Monitor, dated 17 April 2026.

The attached notification presents the Belgium NGO Funding Intelligence Pack (April 2026), an independent, entity-level cross-registry investigation into EUR 7.89 billion in EU grants to 758 verified Belgian NGOs and NFPOs, 2014–2024. It places before the EPPO **four findings** derived exclusively from documents the EPPO itself produced and disclosed, the FOIA response PA/2025/10/06/143 of 17 November 2025, College Decision 063/2023, and the EPPO 2024 Annual Report, combined with the Belgium dataset built from four official public registries.

EU Money Monitor acknowledges explicitly that the EPPO's Legal Service handling of FOIA PA/2025/10/06/143 demonstrated a level of transparency and institutional precision markedly more substantive than comparable responses received from other EU oversight actors in the same period. That acknowledgement is on the record.

This notification is transmitted simultaneously to OLAF (ref. EUMM-OLAF-2026-004), the European Commission (ref. EUMM-EC-2026-002), the European Court of Auditors (ref. EUMM-ECA-2026-001), the EP Committee on Budgetary Control (ref. EUMM-EP-2026-003), and selected European media.

The EPPO is offered seven working days to provide a written, attributable. The response, partial response, or non-response will be reported accurately, by name and institution, alongside this investigation.

The full **Belgium NGO Funding Intelligence Pack**, the complete Excel dataset (758 entities, 29 columns, 14 analytical charts, transparency scores, HR diagnostics, parallel grant load, and 31-entity statistical watchlist), the auditor-style PDF report, the methodology documentation, and the underlying FOIA source files, **is made available to the EPPO at no cost for official institutional review, upon request.**

Attachments:

1. EUMM-EPPO-2026-005 — Formal letter to EPPO, 17 April 2026
2. The 10 Blind Spots of EU Funding Oversight — Belgium Pilot 2026 (14 pp., fully sourced)

3. EASE 2025/5328 — Commission written response: 45 HR audits confirmed (Ares(2026)989413, 28 January 2026)
4. EASE 2025/6050 — OLAF FOIA response: "no statistical data exists" on NGO investigations (8 January 2026)

Reference: EUMM-EPPO-2026-005

Investigation: www.brussels-leaks.eu/investigation/

Yours faithfully,

Anca Păduraru

Founder, EU Money Monitor · NGO Transparency Dashboard

NEXT COMMUNITY SRL · Brussels, Belgium

Brussels, 17 April 2026

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EU Money Monitor's position is unequivocally pro-European: in a Union governed by the rule of law, transparency is not hostility to the institutions, but a condition of their legitimacy, credibility, and democratic consent.

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