

# Q&A on the proposed Directive on third country interest representation

October 2024

This document aims to answer key questions and clarify common misconceptions about the proposed [Directive on third country interest representation 2023/0463 \(COD\)](#) and foreign interference legislations<sup>1</sup>.

Civil society believes that the proposed Directive, as it stands, is incompatible with its legal basis of Article 114 of the Treaty on the Functioning of the European Union (TFEU)<sup>2</sup>, represents an unjustified restriction of the right to freedom of association and will result in shrinking civic space and geopolitical damage to the EU's external actions promoting democracy and human rights. Civil society, therefore, requests the legislators to reject the Directive in its current form. Moreover, it requests the conduction of an impact assessment to analyse alternative policy options based on their effects on fundamental rights and civic space - e.g. on freedom of expression and association, the free flow of capital, the possibilities to participate in civil dialogue, as well as on the possibilities of advocacy by social movements, spontaneous or newly established citizens' coalitions.

This document has been prepared by the informal coalition on the Defence of Democracy Package coordinated by [Civil Society Europe](#) with contributions from [Article 19](#), the [European Civic Forum](#), [European Partnership for Democracy](#), and the [European University Association](#).

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<sup>1</sup> For a more concise version of this document, visit [here](#). For an analysis of the Directive from a legal, civic space and fundamental rights perspective, you can read the [common Civil Society Policy Brief](#) on the topic.

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:12012E/TXT>

## Foreign interference in Europe

- **Would the proposed Directive have prevented the cases of corruption that involved MEPs, such as the Qatargate and the Russiagate?**

The previous European Parliament term has been hit by two scandals: the Qatargate scandal, and the Russiagate. In the Qatargate scandal, Qatar and Moroccan authorities paid key current and former MEPs to support files in favour of the respective countries. The NGO sector came under the spotlight because two of the people arrested were linked to NGOs: Pier Antonio Panzeri, former MEP and founder of the NGO 'Fight Impunity', and Niccolò Figà-Talamanca, Secretary General of the NGO 'No Peace Without Justice' (who has been released without conditions<sup>3</sup>). However, media investigations<sup>4</sup> confirmed that the NGOs were not directly involved in the case (for now there is no direct link between the financing to the NGOs and the accused, nor have the NGO's activities promoted Morocco's or Qatar's interests). Rather, 'Fight Impunity' was used by Panzeri to have access to the European Parliament after losing his seat as a MEP, and the illicit funds were directed to him for personal advantage (support for electoral campaigns, expensive travels) and paid by middlemen not officially acting on behalf of the government's authorities (such as the then Moroccan ambassador to Poland, Abderrahim Atmoun). Such instances would not have been covered by the proposed Directive, which targets official authorities or third parties funded by them to act on their behalf as interest representation service providers. Indeed, the proposed Directive defines third-country entities as corresponding to the central government or other level of public authorities or a "public or private entity whose actions can be attributed" to a government or public authorities in a third country (Article 2(4)).

The Russiagate scandal, uncovered by Belgian and Czech intelligence services, involves a media outlet based in Czechia, 'Voice of Europe', used by the Ukrainian oligarch Viktor Medvedchuk, an ally of Putin's, to pay MEPs to spread pro-Russian views in the European Parliament<sup>5</sup>. 'Voice of Europe' is a media platform not financed directly by a third-country entity and that is based in a Member State. Therefore, it would have been outside of the scope of the proposed Directive (but would have needed to disclose its sources of funding according to the European Media Freedom Act, *see below*).

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<sup>3</sup> Qatargate: Niccolò Figà-Talamanca, suspect in corruption probe, released from jail.

<https://www.politico.eu/article/qatargate-suspects-corruption-probe-released-niccolo-figa-talamanca/>

<sup>4</sup> Inside Fight Impunity, the Brussels NGO at the heart of the Qatar corruption scandal.

<https://www.politico.eu/article/inside-fight-impunity-brussels-ngo-qatar-corruption-scandal-european-parliament-panzeri-kaili-giorgi/>

Inside Morocco's efforts to corrupt the European Parliament.

<https://www.politico.eu/article/morocco-corrupt-european-parliament-union-qatargate-bribery-scandal-eu/>

Qatar corruption scandal: A mysterious NGO with former European Commissioners on the board

<https://www.brusselstimes.com/339646/qatargate-a-mysterious-ngo-with-former-european-commissioners-in-the-board>

<sup>5</sup> Russian propaganda network paid MEPs, Belgian PM says.

<https://www.politico.eu/article/russia-disinformation-propaganda-members-of-european-parliament-belgium-alexander-de-croo/>

Russian influence scandal rocks EU.

<https://www.politico.eu/article/voice-of-europe-russia-influence-scandal-election/>

EU's Russiagate hits German far right.

<https://www.politico.eu/article/russiagate-hits-german-far-right-european-parliament-afd/>

Both cases underline how foreign interference attempts are carried out via middlemen that do not directly represent the government (as in Russiagate), or via directly financing individuals (as in Qatargate), acting covertly. Furthermore, it shows that the judicial and intelligence services are capable of detecting these cases, which calls for a reinforcement of their abilities to cooperate, as well as the mandate of the European Public Prosecutor Office.

- **Does the proposed Directive cover foreign funding for political parties?**

In recent years, it has been revealed how third countries have been funding political parties in the EU. For instance, the United States revealed that Russia provided 300 million dollars to political parties and candidates in more than 20 countries since 2014 to exert influence<sup>6</sup>; it is also known that the French far-right party Rassemblement National took a loan of 9.4 million euros from a Russian bank, using party contacts with Russian authorities.<sup>7</sup> However, political parties are not in the scope of the Directive proposal because it only applies to interest representation activities and services. National parties' funding rules are decided at the national level, while a European legislative regime exists only for European political parties and foundations.<sup>8</sup>

- **Would the proposed Directive have revealed the Russian attempts to influence the Catalan independence process in 2017?**

During the presentation of the Directive proposal in the IMCO Committee on 20th March 2024, rapporteur Pablo Arias Echeverría explicitly mentioned the Russian influence in reference to the Catalan referendum as a justification for his support for the proposed Directive. However, as revealed in journalistic reports<sup>9</sup> and recognised in a recent resolution of the European Parliament<sup>10</sup>, the supposed contacts with the Russian authorities would have happened between Russian intermediaries and members of the Catalan regional government. Therefore, the proposed Directive, neither in its current text nor in the proposed version by the JURI Committee rapporteur, would have been able to detect such contacts. This reiterates how such attempts at foreign interference work via middlemen and personal contacts with people in

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<sup>6</sup> Russia has funded political parties abroad to the sum of \$300 million since 2014.

<https://www.brusselstimes.com/289231/russia-has-funded-political-parties-abroad-to-the-sum-of-300-million-since-2014>

<sup>7</sup> A Russian bank gave Marine Le Pen's party a loan. Then weird things began happening.

[https://www.washingtonpost.com/world/national-security/a-russian-bank-gave-marine-le-pens-party-a-loan-t-hen-weird-things-began-happening/2018/12/27/960c7906-d320-11e8-a275-81c671a50422\\_story.html](https://www.washingtonpost.com/world/national-security/a-russian-bank-gave-marine-le-pens-party-a-loan-t-hen-weird-things-began-happening/2018/12/27/960c7906-d320-11e8-a275-81c671a50422_story.html)

<sup>8</sup> 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.

<sup>9</sup> Fueling Secession, Promising Bitcoins: How a Russian Operator Urged Catalan Leaders to Break With Madrid.

<https://www.occrp.org/en/investigations/fueling-secession-promising-bitcoins-how-a-russian-operator-urged-catalonian-leaders-to-break-with-madrid>

Russian group offered Catalan separatist leaders 10,000 soldiers, judge says.

<https://www.politico.eu/article/russian-group-offered-catalan-separatist-leaders-10000-soldiers-according-to-judge>

<sup>10</sup> European Parliament resolution of 8 February 2024 on Russiagate: allegations of Russian interference in the democratic processes of the European Union (2024/2548(RSP)).

[https://www.europarl.europa.eu/doceo/document/TA-9-2024-0079\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2024-0079_EN.pdf)

power, which calls for a strengthening of the European intelligence system, rather than the proposed Directive.

## Foreign interest representation legislation outside of the EU

- **Is there a good model of foreign interest legislation outside of the EU?**

No, there is not. In 2023, the Good Lobby produced a report on foreign interest legislation in OECD countries,<sup>11</sup> both in vigour, no longer in force or planned to be adopted, covering the US, Australia, Israel, Canada, UK, Hungary, as well as (outside of OECD) Russia. While the legislations have different provisions and levels of enforcement, all of them are characterised by vague definitions, unclearness in the definition of ‘acting on behalf of a third country’, contain legal loopholes that are exploited by foreign actors, and have been unpredictably enforced. This makes them all subject to the risk of weaponisation by governments to target specific associations (e.g. environmental organisations during the Trump Presidency). Furthermore, there is little evidence that such laws are effective in preventing malign foreign influence.

- **How does the proposed Directive impact the EU’s stance towards third countries’ foreign influence laws?**

The EU has several times spoken out against so-called ‘transparency laws’ in other regions, which have been used as a pretext to limit civic space and silence dissenting voices.<sup>12</sup> The proposed Directive, however, risks undermining the credibility of such stances by the Union. This has already happened with the proposed Georgian foreign influence bill. The bill, which was proposed and withdrawn after mass demonstrations and the condemnation of the EU and international organisations, has recently been approved by the Georgian Parliament with minimal changes. This triggered new mass demonstrations in Georgia, as well as the condemnation from the UN<sup>13</sup> and the EU.<sup>14</sup> While the core elements of the legislation had not been amended and are different from the proposed Directive,<sup>15</sup> the changes reflect an adaptation to the language of the Directive. This has explicitly been indicated by the President of the Georgian Parliament when responding to the concerns of the Council of Europe on the draft law,<sup>16</sup> which demonstrates how the proposed Directive can be used by other governments to support and implement laws to further restrict civic space. Overall, this will

<sup>11</sup> How to Evaluate a Foreign Influence Legislation? A Comparative Analysis.

<https://www.thegoodlobby.eu/wp-content/uploads/2023/11/TGL-Study-How-to-Evaluate-a-Foreign-Influence-Legislation-A-Comparative-Analysis.pdf>

<sup>12</sup> E.g., [EEAS, Georgia: Statement by the High Representative on the adoption of the “foreign influence” law.](#)

<sup>13</sup> UN rights chief urges Georgia to scrap ‘foreign influence’ bill.

<https://news.un.org/en/story/2024/05/1149291>

<sup>14</sup> Georgia: Speech by the High Representative/Vice-President Josep Borrell in the EP plenary on attempts to reintroduce a foreign agent law in Georgia and its restrictions on civil society.

[https://www.eeas.europa.eu/eeas/georgia-speech-high-representativevice-president-josep-borrell-ep-plenary-a-ttempts-reintroduce\\_en?s=221](https://www.eeas.europa.eu/eeas/georgia-speech-high-representativevice-president-josep-borrell-ep-plenary-a-ttempts-reintroduce_en?s=221)

<sup>15</sup> The EU Directive covers only third-country State funds, while the Georgian law covers any funds from abroad; the EU Directive has no threshold, while the Georgian law has a threshold of 20% of the total income of an organisation to be applied for such organisation; the EU Directive tries to establish safeguards, which are absent in the Georgian law.

<sup>16</sup> <https://rm.coe.int/comments-of-the-authorities-of-georgia-to-the-commissioner-s-letter/1680af5b7b>

make the EU's own work in supporting human rights and democracy groups worldwide much more difficult.

## Disinformation, media and social media

- **Does the proposed Directive tackle disinformation?**

No, disinformation is completely outside of the scope of the Directive proposal. The EU has adopted different tools to tackle disinformation, including an Action Plan, as well as voluntary Codes of Practice against Disinformation which has become a binding Code of Conduct enforceable under the Digital Services Act (DSA).<sup>17</sup> Furthermore, the European External Action Service (EEAS) has launched a specific communication unit against disinformation, called EUvsDisinfo.<sup>18</sup>

- **Does the proposed Directive tackle governmental attempts to influence public opinion via media?**

It is not clear whether the media is completely outside of the scope of the Directive. Recital 25 of the Directive states that, while the provision of media and audiovisual services under the European Media Freedom Act and the Audiovisual Media Service Directive is not covered, *“interest representation activities carried out on behalf of third country entities within the meaning of this Directive by media service providers will be covered”* (Recital 25). However, the proposed Directive only provides that the information specified for the register by the interest representation service provider must include, where applicable, *“a reference to media service providers or online platforms where advertising are placed as part of the interest representation activity”* (Recital 37). When disseminating advertisements as a service for entities carrying out interest representation activities on behalf of third countries, such media service providers or online platforms must, therefore, be named in the registration of the entity, and the relevant costs must be included in the amount of remuneration declared by the interest representation service provider. No further specifications are present in the actual text of the legislation.

Moreover, in practice, many NGOs across the EU perform a media function when their activities are focused on informing the public on issues of public interest, be it environmental concerns, social justice, or economic inequalities. The contemporary human rights approach to journalism is to interpret it as a civic function, which can be exercised by numerous civil society actors, rather than a regulated profession.<sup>19</sup> It is a view shared both by the Human Rights Committee<sup>20</sup> and the European Court of Human Rights,<sup>21</sup> which has progressively recognised that the public watchdog function, previously associated mostly with the press, is

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<sup>17</sup> Signatories already provide reports on the implementation of this Code of Practice.

<https://digital-strategy.ec.europa.eu/en/news/code-practice-disinformation-new-reports-available-transparency-centre>

<sup>18</sup> <https://euvsdisinfo.eu/>

<sup>19</sup> ARTICLE 19, International standards: Regulation of media

workers, <https://www.article19.org/resources/international-standards-regulation-media-workers/>

<sup>20</sup> HRC, General Comment 34, Article 19: Freedoms of opinion and expression, para. 44.

<https://www2.ohchr.org/english/bodies/hrc/docs/gc34.pdf>

<sup>21</sup> ECtHR, Animal Defenders International v. the United Kingdom [GC] - 48876/08. Judgment 22.4.2013 [GC].

<https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%5B%22002-7454%22%5D%7D>

also performed by other civil society actors. Separately, many professional media may choose to register as NGOs for a variety of regulatory and practical reasons in a given Member State. As such, the Directive will inevitably require compliance with its registration and public disclosure requirements from civil society actors who perform media functions and, thus, will produce a chilling effect on journalism as well.

The European Media Freedom Act covers the topic, especially by foreseeing measures to guarantee the editorial independence of public media and full transparency of the ownership of news and current affairs outlets. This underlines another problem with the Directive, i.e. its focus on third-country foreign interference, while overlooking such attempts at interference from within the EU. For instance, it has been revealed that the acquisition of Euronews by a Portuguese investment group close to the Hungarian Prime Minister Viktor Orban was financed via a Hungarian state fund, with the aim to change its editorial policy<sup>22</sup>. Other examples of such attempts by the Hungarian government to covertly influence EU public opinion can be found in the financial support to “The European Conservative” and “Brussels Signal” media and to the think tank MCC<sup>23</sup>.

- **Does the proposed Directive address the concerns over the power of third-country social media platforms?**

No, social media platforms and their impact on public opinion are in principle outside of the scope of the proposed Directive, although they must be mentioned in the registration information when advertisements are placed on the platform as part of the interest representation activity, as mentioned above. However, online platforms, and more specifically social media platforms, are the object of two other EU regulations, the Digital Markets Act (DMA) and the Digital Services Act (DSA), which do not need a ‘foreign country’ perspective to be effective in tackling third-country social media platforms. In particular, companies such as Alphabet (which owns YouTube), ByteDance (which owns TikTok), Meta (which owns Facebook, Instagram and Whatsapp), Microsoft (which owns LinkedIn), and X (formerly known as Twitter, which is only subject to the DSA at the moment) are subject to the strictest provisions of both regulations, including in the areas of targeted advertising, fundamental rights, public security, civic discourse and electoral processes. Furthermore, the European Media Freedom Act provides measures to prevent big online platforms from arbitrarily restricting or deleting independent media content.

## **Civic space and freedoms of association and expression**

- **How will the proposed Directive impact civic space and freedom of association in the EU?**

The Directive will have negative implications for civic space in the EU. Its provisions do not pass the test of permissible restrictions on freedoms of association and expression. Namely:

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<sup>22</sup> Secret documents reveal that Orbán’s people were behind the purchase of one of Europe’s biggest TV channels. <https://www.direkt36.hu/en/bizalmas-iratok-leplezik-le-hogy-orbanek-titokban-finansziroztak-az-egyik-legnagyobb-europai-tevecsatorna-megvasarlasat/#>

<sup>23</sup> Viktor Orban brings culture war to Brussels.

<https://www.politico.eu/article/viktor-orban-hungary-culture-war-woke-brussels/>

- transparency for its own sake is not a legitimate aim for restrictions and no recognised legitimate aim is convincingly put forward in the proposal;
- the concept of “interest representation” is vague and defined through an overbroad list of NGO activities without linking them to the specific threshold of “foreign influence”. As such, it does not pass the test of legality;
- the onerous compliance requirements and sanctions do not satisfy the test of necessity and proportionality and would produce a chilling effect on NGOs’ operations.

The possibility to access different sources of funding is essential for a vibrant civil society. The proposal might create a chilling effect on engaging with non-EU state donors, which will thus limit funding opportunities for CSOs. NGOs should be free to seek funding opportunities that can potentially be used to criticise the EU’s policies. These are the demands of pluralism and uninhibited debate on issues of public interest in a democratic society. Although the legislator claims that the proposal contains safeguards against stigmatisation, the fear of extra compliance efforts might be more than sufficient to discourage NGOs from taking on projects or activities funded by third countries.

Mandatory registration, public disclosure and sanctions do not respond to any individual threat that would satisfy the legal test of a “pressing social need”. A number of administrative requirements for registration, disclosure and record keeping would add up to be an onerous burden for many NGOs, effectively interfering with their normal operations. This is particularly harmful for small organisations, which cannot afford to hire compliance personnel or consultants. The Venice Commission<sup>24</sup> and the OSCE<sup>25</sup> have made these points in relation to Russian-style ‘foreign agents’ laws, even when the latter were still in their less draconian versions. Secondly, the administrative fines fixed in the Directive are significant and do not pass the proportionality test.

## Research and academic freedom

- **What impact would the proposed Directive have on the debate on foreign interference in research and education and on academic freedom?**

The Higher Education (HE) and Research and Innovation (R&I) sectors have been discussing the issue of foreign interference. HE and R&I Institutions have long-standing experience in securing educational and research collaboration. As the geopolitical situation has become more conflictual, academic institutions have changed their international activities towards a more cautious and risk-aware approach. This does not only concern foreign interference but also the sharing of sensitive or strategic technologies as well as the safety of students, academic staff and partners.

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<sup>24</sup> Venice Commission Opinion on Russia Opinion No. 1014 / 2020.

[https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2021\)027-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2021)027-e)

<sup>25</sup> OSCE/ODIHR Report under the Moscow Mechanism, 2022, p.27-40.

<https://ru.usembassy.gov/wp-content/uploads/sites/138/OSCE-Report-Sep-2022-Russias-Legal-and-Administrative-Practice-in-Light-on-Its-OSCE-Human-Dimension-Commitments-Eng.pdf>

International cooperation is central to the quality of Europe's research and education, and is part of the freedom of dissemination of research results. While academic cooperation must be risk-aware, it would be detrimental to academic freedom to automatically throw suspicion on any cooperation outside the European Union.

Politically, the issue of risks in academic cooperation has been discussed and developed at the EU level through the Foreign Interference Toolkit<sup>26</sup> from 2022 and the Council Recommendations on Research Security from May 2024.<sup>27</sup> The basis for these documents is to enable the security system as a whole to manage risks in international cooperation through dialogue. The latter text adopted by the Council explicitly calls for *“facilitat[ing] information exchange between research performing organisations and research funding organisations on the one hand and intelligence agencies on the other hand, for example through classified and non-classified briefings or dedicated liaison officers”*.<sup>28</sup> On that, one University association commented that *“a top-down legislative approach must be avoided in this way”*.<sup>29</sup> The Council Recommendation takes a constructive approach to solving the challenges of research security by focusing on capacity building and dialogue, with information exchange between research performing organisations and research funding organisations on the one hand and intelligence agencies on the other hand, for example through classified and non-classified briefings or dedicated liaison. This approach is agreed among the community to be effective, and it does not limit academic freedom or institutional autonomy. By contrast, the proposed Directive would have detrimental effects and destroy a careful balance that is being carved out by the sector and the institutions (including the Commission itself).

The overall impact of the proposed Directive on the academic sector is generally unclear, which in itself creates risks for academic freedom, as it might lead to unnecessary self-censorship within the academic community as well as to repressive and stigmatising practices from authorities. Recital 19 of the Directive indicates that it applies only when *“the clear purpose of these activities is to influence the development, formulation or implementation of policy or legislation, or public decision-making processes, in the Union and they are carried out on behalf of a third country entity”*, for instance in cases *“such as the dissemination by think tanks of papers recommending or favouring the adoption of a specific public policy”*. Dissemination of recommendations based on scientific evidence is a core part of academic freedom. Unclear definitions, which *a priori* aim to limit foreign interference, and which will be implemented differently across Member States, will undoubtedly limit academic freedom and freedom of expression. The Directive will enable the delegitimation of outcomes of international research projects as well as the academics involved.

For instance, if an EU HE or R&I institution collaborates on a political science research programme with a Canadian institution which has received public funding to carry out a comparative research project, there is doubt whether the European institution would need to register. Even more paradoxically, registration might be needed even under the framework of

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<sup>26</sup>[https://research-and-innovation.ec.europa.eu/news/all-research-and-innovation-news/commission-publishes-toolkit-help-mitigate-foreign-interference-research-and-innovation-2022-01-18\\_en](https://research-and-innovation.ec.europa.eu/news/all-research-and-innovation-news/commission-publishes-toolkit-help-mitigate-foreign-interference-research-and-innovation-2022-01-18_en)

<sup>27</sup><https://www.consilium.europa.eu/en/press/press-releases/2024/05/23/council-adopts-a-recommendation-to-enhance-research-security/pdf/>

<sup>28</sup> <https://data.consilium.europa.eu/doc/document/ST-9097-2024-REV-1/en/pdf>

<sup>29</sup> EU wants spies on university campuses to fight Chinese tech espionage.

<https://www.politico.eu/article/academic-research-campus-eu-universities-intelligence-services-china-spying-technology/>



the Horizon Europe programme. In fact, New Zealand has been integrated into the Horizon Europe programme, with a contribution system based on the involvement of New Zealand researchers in winning consortia, therefore effectively funding only those research projects.<sup>30</sup> Therefore, universities in Horizon Europe project consortia which involve New Zealand researchers might be asked to register, especially since policy relevance and policy proposals are also expected as deliverables of Horizon Europe projects, especially in the fields of social and political sciences. As the Commission is in talks to extend such arrangements to Canada, South Korea and Japan,<sup>31</sup> such registration provisions could become even more paradoxical. More generally, the lack of clarity on the registration requirements would have a chilling effect on international cooperation and academic freedom, and would disrupt the careful work the sector and the Commission's DG RTD are doing in securing HE and R&I while upholding international academic and research collaboration.

Specifically regarding academic freedom, this entails the freedom of academic exchange and dissemination, which is widely seen as a key component of academic freedom and is used for example as an indicator in the European Parliament's Academic Freedom Monitor<sup>32</sup>. As stated above, the proposed Directive will have a direct impact on this freedom, as any cooperation outside the European Union will be subject to unclear and potentially stigmatising rules.

In sum, the academic community is well aware of the risks of international cooperation in a tense geopolitical context. However, these must be met through a risk management system that builds on dialogue and cooperation between the academic community and the wider security system. Initiatives such as the Council Recommendations on research security are helpful for this purpose, whereas the proposed Directive does not efficiently address the issue while significantly endangering key aspects of academic freedom.

## Conclusion

The questions developed in this document show how recent cases of attempts at foreign interference (Qatargate, Russiagate, foreign funding to political parties, Russian attempts at influencing the Catalan government) could have not been detected with the proposed Directive on third-country interest representation. Moreover, they show the lack of an effective and human-rights sensible foreign interest law to draw inspiration from, and how the proposed Directive will likely have a detrimental effect on academic freedom and is already being used to justify foreign agents law in third countries, such as Georgia. The questions presented also show how concerns about foreign interference in issues such as social media, media ownership, and disinformation are tackled by other pieces of legislation (e.g. DSA, DMA, EMFA). Finally, they show how general legislation, which applies to both internal and external actors (such as the EMFA) can detect foreign interference without stigmatising and adding new bureaucratic burdens to a specific set of actors such as CSOs, universities and others that could receive third-country funding.

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<sup>30</sup> EU and New Zealand sign Horizon Europe deal as new association details emerge.

<https://sciencebusiness.net/news/horizon-europe/eu-and-new-zealand-sign-horizon-europe-deal-new-association-details-emerge>

<sup>31</sup> [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_23\\_3728](https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3728)

<sup>32</sup> [https://www.europarl.europa.eu/RegData/etudes/STUD/2024/757798/EPRS\\_STU\(2024\)757798\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2024/757798/EPRS_STU(2024)757798_EN.pdf)