

# Transparency International EU

The global coalition against corruption

## Open letter on the Hungarian bill entitled “Transparency of Public Life”

Pia Engelbrecht-Bogdanov · Friday, May 23rd, 2025

The following letter was submitted by Transparency International EU and the 319 undersigned organisations. Access it as a PDF file [here](#).

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**President Ursula von der Leyen**

President of the European Commission European Commission

**Commissioner Michael McGrath**

Commissioner for Democracy, Justice, the Rule of Law, and Consumer Protection

22 May 2025

Dear President von der Leyen,

Dear Commissioner McGrath,

On 13 May, 2025, a member of Hungary's ruling Fidesz party, submitted a new bill entitled the [Transparency of Public Life](#), which would enable the government to target, defund and dissolve any organisation it designates as “a threat to Hungarian sovereignty”. Labelled “Operation Starve and Strangle” by civil society organisations, the bill, if adopted, would provide the government with the final tools to effectively and completely silence the remaining independent voices in Hungary. Ahead of the 2026 parliamentary elections, it is a stark warning.

In a long series of actions that have served to dismantle the operation of basic elements of the rule of law, this bill is the most brazen attempt yet and demands **immediate action utilising ongoing infringement proceedings, funding conditionality and the Article 7 TEU process**.

The bill, which was not open to public consultation, targets organisations along four main axes:

**Foreign funding targeted through extended powers of the Sovereignty Protection Office (SPO):** the bill would require the SPO to propose a list of organisations that use foreign funding to “influence public life”. The final list would then be decided by decree of the government. “Influencing public life” is not clearly defined and therefore fails to comply with the principle of legality, depriving organisations from the necessary precision to regulate their conduct and potentially exposing them to arbitrariness. Once listed, an organisation would only be able to accept foreign support with the prior authorisation of the competent authority.

**Exclusion from domestic funding:** listed organisations would be barred from accessing the domestic 1% tax donation scheme. An additional burden would also be placed on all Hungarian donors, requiring them to secure two witnesses to confirm their funding is not from abroad.

**Misuse of the Anti-Money Laundering (AML) provisions:** the bill would make it mandatory for the Tax Authority and credit institutions to scrutinise every foreign funding transaction based on whether they anticipate the funding will be used to “influence public life.” It would also permit credit institutions to transfer foreign funding to the state-owned National Cooperation Fund. Managers of “excluded organisations” would fall under the category of “politically exposed persons” subjecting them to AML and terrorist financing laws despite not being required under European Union (EU) and global AML laws.

**Decisions without due process:** each step raises serious due process concerns. The government would issue the list of the affected organisations in a normative act (decree) depriving them from judicial oversight and preventing them from seeking redress. The right to appeal other decisions under the law is significantly narrowed – including decisions such as freezing an organisation's bank account or issuing bans that prevent listed organisations from further activities to “influence public life”.

The bill would apply to all organisations in receipt of foreign funding, including private donations from within the EU and grants from the EU institutions, from civil society and media organisations to private companies and possibly even political parties. However, only those included on the list compiled on political grounds would be affected.

The bill is in clear violation of EU law, including the free movement of capital, the General Data Protection Regulation (GDPR) and the right to freedom of expression, association, the right to effective judicial protection and the right to protection of private life protected under the EU Charter of Fundamental Rights, the European Convention on Human Rights and the International Covenant on Civil and Political Rights. It is reminiscent of, but goes far beyond, the 2017 Law on the Transparency of Organisations Receiving Foreign Funding, which was [found in 2020 to be incompatible with EU law](#) by the Court of Justice of the European Union (CJEU).

This is the latest element in a complete and systematic breakdown of the rule of law since 2012, including the failure to effectively comply with court judgments and the continued use of rule by decree. It also compounds the most recent amendments, just one month ago, to the Fundamental Law attacking the LGBTIQ+ community and restricting freedom of peaceful assembly.

We urge you to take the following immediate steps:

- **Immediately request the Court of Justice of the European Union (CJEU) to grant interim measures in the ongoing infringement procedure on the Law on the Defence of National Sovereignty** (Case C-829/24). The Sovereignty Protection Office is crucial to the new bill and therefore this is an imminent and effective way to halt the progress and impact of the bill. Cognizant of the impending danger, the [European Parliament](#) and [civil society](#) have been calling for this step since 2024. Interim measures are designed to prevent irreparable harm — in this case, the effective paralysis of civil society organisations, independent media and dissenting voices — and with this new development comprehensive interim measures should be requested immediately.
- **At the same time, call on the Hungarian government to withdraw the bill and if unsuccessful, open a new infringement procedure on new violations that are not linked to the ongoing case on the Defence of National Sovereignty.**

- With the forthcoming **Article 7 hearing on Hungary** on 27 May 2025 and recognising the escalation of a systematic breakdown of the rule of law, support the Council of the EU to move to a vote on Article 7(1).

This new bill represents a severe and existential threat to democratic principles, human rights and the rule of law in Hungary and in the EU as a whole. If the existing tools are not effectively deployed, we risk an unravelling of the rules on which the EU was founded and a clear step towards authoritarian practices. We call on you to stand in solidarity with Hungarian civil society and their counterparts across the region and remain available to provide additional information and support.

Yours sincerely,

A.O. Centrul de Dezvoltare Durabil? și Inovare Civic?

A.R.T. Fusion Association (Romania)

Access Info Europe (Spain)

Action Europe Association, Poland

ActiveWatch (Romania)

Aditus foundation (Malta)

Albanian Center for Population and Development (Albania)

Alliance for Cross- Sectoral Development (Latvia)

Alliance of High School Students of Slovakia

Amber Trail Association (Slovakia)

America, Spain, Solidarity and Cooperation (AESCO NGO) – Spain

Amnesty International

ANTENA – network for independent culture (Slovakia)

APADOR-CH (Romania)

Araminta

ARCI Italy

Arnika (Czechia)

Artistic Freedom Initiative

Asociacion en Prevencion y Asistencia de la Violencia APAV España

Asociación Por Ti Mujer (Spain)

Asociación Pro Derechos Humanos de España, APDHE (Spain)

Asocia?ia ARK Oradea Association (Romania)

Asocia?ia Centrul Pentru Studiul Democratiei/Association Center for the Study of Democracy (Romania)

Asocia?ia Incluziune pe Bune (Timi?oara, România) Asocia?ia SEXUL vs BARZA (Romania)

Asociatia UNIC (Romania)

Association “Ekonomisk? sadarb?ba un invest?cijas Latvijai” (#esiLV “Economic cooperation and investments for Latvia” (Latvia)

Association Feminism Romania (Romania)

Association for Integration and Migration (Czech Republic)

Association for Legal Studies on Immigration (Italy)

Association for Liberty and Equality of Gender – A.L.E.G. (Romania)

ASTI Luxembourg

ASTRA-Anti trafficking action (Serbia)

Átlátszó Erdély/Transparent Transylvania (Romania)

Autonomia (fundacja)

Balkan Civil Society Development Network (BCSDN)

Baltic Sea NGO Network, Denmark

Biedr?ba “Laiks Jauniešiem” / NGO “Time For Youth” (Latvia)

Biedr?ba Ziemup?te, Latvia

Biofuelwatch (Europe/USA)

Blueprint for Free Speech (Germany)

Bulgarian Helsinki Committee

Bulgarian Center for Not-for-Profit Law Foundation

Calala Women’s Fund (Spain)

Center for Community Organizing (Slovakia)

Center for Participation and Development (Georgia)

Center for Partnership and Equality Foundation – CPE (Romania)

Center for Policies and Reforms (CPR Moldova)

Center for Public Innovation (Romania)

Center for Reproductive Rights

Center for the Research of Ethnicity and Culture – CVEK (Slovakia)

Center for the Study of Democracy (Romania)

Centre for Legal Resources – Romania

Centre for Peace Studies (Croatia)

Centre for Peace, Nonviolence and Human Rights – (Croatia)Osijek

Centre Mokosha (Slovakia)

Centrul de Antreprenoriat si Politici Economice (Moldova)

Centrul FILIA/FILIA Center (Romania)

Centrum Inwestycji Spo?eczno-Ekonomicznych CISE/ Centre of Socio-Economic Investments (Poland)

Centrum pre filantropiu n.o.

Centrum Promocji i Rozwoju Inicjatyw Obywatelskich Center of Promotion and Development of Civic Initiatives OPUS (Poland)

CEPTA (Slovakia)

CeRe: Resource Center for Public Participation (Romania)

CESI-Center for Education, Counselling and Research, Croatia

CEU Democracy Institute Rule of Law Clinic

Children of Slovakia Foundation – NDS (Slovakia)

CINEFIL (Slovakia)

Citizen OS Foundation (Estonia)  
 Citizens Network Watchdog (Poland)  
 Ciudadanía Inteligente (Latin America)  
 Civic Alliance – Latvia  
 Civic Development Forum (FOR) (Poland)  
 Civic Educational Association (STO) – Poland  
 Civic Radauti Association  
 Civil Liberties Union for Europe  
 Civil Rights Defenders (Sweden)  
 Civil Society Alliance Austria (Bündnis für Gemeinnützigkeit)  
 Civil Society Development Foundation (Romania)  
 Civil Society Forum e.V  
 CIVIS FORTIS (Foundation for Civil Society Protection, Ukraine)  
 Club “The House” – youth for a united Europe (Latvia)  
 Community Centers platform (Slovakia)  
 CONCORD Europe  
 Corporate Europe Observatory (CEO, Brussels)  
 Croatian Platform for International Citizen Solidarity (CROSOL)  
 Culture Action Europe  
 Culture Shock Foundation (Poland)  
 Cyklokuchyna Bratislava  
 Danish Helsinki Committee for Human Rights  
 DEMAS (Czechia)  
 Democracy International e.V.  
 Democracy Reporting International (DRI) (Germany)  
 Democratic Society AISBL, Demsoc (Belgium)  
 D?ti Zem?, ?eská republika (Children of the Earth, Czech Republic)  
 Documenta – Center for Dealing with the Past (Croatia)  
 Dúhový PRIDE Bratislava (Slovakia)  
 E-Romnja Association (Romania)  
 East European Institute for Reproductive Health (Romania)  
 Eco-Razeni Association, Republic of Moldova  
 Ecumenical Women’s Initiative, Croatia  
 Education for Democracy Foundation (Poland)  
 Eiropas Kust?ba Latvij?/European Movement – Latvia (Latvia)  
 EKOSKOP Association (Poland)  
 Election-Watch.EU (Austria)  
 Epicenter.works – for digital rights  
 Estonian Human Rights Centre  
 Estonian LGBT Association  
 Ethnographic Laboratory Association, Poland  
 EuroCentralAsian Lesbian\* Community  
 European AIDS Treatment Group (EATG), Belgium  
 European Center for Not-for-Profit Law Stichting

European Centre for Press and Media Freedom (ECPMF)  
 European Civic Forum  
 European Environmental Bureau (EEB)  
 European Exchange (Germany)  
 European Federation of Journalists (EFJ)  
 European Network against Racism (ENAR), Belgium  
 FAIRWORK Belgium  
 FairWork, the Netherlands  
 Federacja Mazowia / Mazovia Federation  
 Feminist Collective of Romani Gender Experts  
 Fern (Europe)  
 Field of Dialogue Foundation (PL Fundacja Pole Dialogu)  
 filia.die frauenstiftung (Germany)  
 Finnish League for Human Rights (Finland)  
 FoRS (Czech Republic)  
 Foundation for Advancement from Republic of Moldova  
 Foundation for Poland  
 Foundation for the Cultural Exchange toTU toTAM (Poland)  
 Foundation PLECS (Latvia)  
 Free Courts Foundation / Fundacja Wolne S?dy (Poland)  
 Free Press for Eastern Europe (Czechia)  
 Free Press Unlimited (FPU)  
 Freedom Foundation (Poland)  
 Freedom of choice Slovakia  
 Frente Cívica (Portugal)  
 Friends of the Earth – SPZ (Slovakia)  
 Fundacja Aktywna Demokracja (Poland)  
 Fundacja Civis Polonus (Polandska)  
 Fundacja Reporterów Reporters Foundation (Poland)  
 Fundacja STREFA (Poland)  
 Fundatia pentru Parteneriat (Romania)  
 Funky Citizens (Romania)  
 Generation for Change CY (Cyprus)  
 Glopolis, o.p.s. (Czech Republic)  
 Great Lakes and Wetlands Association, Hungary  
 Green Impact (Italy)  
 Green Liberty, Latvia  
 Greenpeace Slovakia  
 Grupa Zagranica (Poland)  
 Health Referral Center, Swedish Red Cross  
 Health Solutions for Open Society Foundation Ukraine  
 Helsinki Citizens' Assembly-Vanadzor (Armenia)  
 Helsinki Foundation for Human Rights (Poland)  
 HERA XII (Georgia)

Hnutí DUHA – Friends of the Earth Czech Republic  
 Human Rights Centre ZMINA (Ukraine)  
 Human Rights House Foundation (international)  
 Human Rights House Zagreb  
 Human Rights League (LDH, Belgium)  
 Human Rights Monitoring Institute (Lithuania)  
 Human Rights Watch  
 Hungarian Civil Liberties Union  
 Hungarian Helsinki Committee  
 Iele-Sânziene Association (Romania)  
 IkluCiTy, Ob?ianskeOb?ianskw združenie (Slovakia)  
 ILGA-Europe  
 Immigrant Council of Ireland  
 Index on Censorship  
 Information Society Development Foundation, Poland  
 Iniciatíva Inakos? (Slovakia)  
 Inicjatywa “Nasz Rzecznik”/ “Our Ombudsman” Initiative (Poland)  
 Initiative for Social Change ARSIS (Albania)  
 INPRIS – Institute for Law and Society (Poland)  
 Institute for Active Citizenship (IPAO) (Slovakia)  
 Institute for Mass Media – Cyprus  
 Institute for Public Policy (Moldova)  
 Institute of Public Affairs (Poland)  
 Institutul de Cercetare F?g?ra?/Fagaras Research Institute (Romania)  
 Intercultural Institute, Timisoara (Romania)  
 International Commission of Jurists  
 International Federation for Human Rights (FIDH), in the framework of the Observatory for the Protection of Human Rights Defenders  
 International Federation of ACAT (FIACAT)  
 International Partnership for Human Rights (Belgium)  
 International Planned Parenthood Federation – European Network (IPPF EN)  
 International Renaissance Foundation, Ukraine  
 Irdia – Human Rights Defense Centre  
 Irish Council for Civil Liberties  
 Jan Langos Foundation (Slovakia)  
 Jauniešu biedrība SOLIS (Youth society “A STEP”)  
 Jesuit Refugee Service (JRS) Europe  
 Juniper (fundacja)  
 KARTA Center Foundation/Fundacja O?rodka KARTA  
 Klon/Jawor Association, Polando  
 Kompromis – Kompromisszum (Slovakia)  
 Krytyka Polityczna (Poland)  
 Kultur-A, civic association, (Slovakia)  
 Kurzemes NVO Centrs, Latvia



La Strada International – European NGO Platform against Human Trafficking  
 Laboratory of Initiatives for Development “LID Moldova” (Republic of Moldova)  
 Latvian Centre for Human Rights  
 Latvian fund for Nature (Latvia)  
 Latvian Platform for Development Cooperation LAPAS  
 Lawyers’ Committee for Human Rights YUCOM (Serbia)  
 LDH (Ligue des droits de l’Homme) (France)  
 League of Human Rights (Czechia)  
 Leefmilieu (Netherlands)  
 Legal Resources Centre from Moldova, Moldova  
 Liga voor de Rechten van de Mens (Netherlands League for Human Rights)  
 Lobbio, z.s. (Czech Republic)  
 Mareena (Slovakia)  
 MEMO 98 (Slovakia)  
 Mier Ukrajině, občianske združenie (Peace for Ukraine, civil association)  
 Migrant Rights Centre Ireland  
 Milan Šimečka Foundation (Slovakia)  
 MOSAIC for Democracy (Croatia)  
 My Future Foundation (Poland)  
 National Environmental Center, Moldova  
 National Federation of Polish NGOs OFOP (Poland)  
 NaZemi (Czechia)  
 Netherlands Helsinki Committee  
 Network of Estonian Non-Profit Organisations  
 NGO for International Project work  
 NOAH – Friends of the Earth Denmark  
 NOMADA Association for Multicultural Society Integration (Poland)  
 Norwegian Helsinki Committee (Norway)  
 Not in our town, civic platform (Slovakia)  
 NOVACT – The Institute Novact of Nonviolence  
 Občianske spoločenstvo (Slovakia)  
 Open Estonia Foundation (Estonia)  
 Open Lithuania Foundation (Lithuania)  
 Open Republic – Association against Anti-Semitism and Xenophobia  
 Open society foundation Bratislava (Slovakia)  
 Open Society Fund Prague (Czech Republic)  
 Open Society Institute – Sofia (Bulgaria)  
 ORBITvzw Belgium  
 Organization “Tavi draugi”, Latvia  
 Organization for Aid to Refugees (OPU, Czechia)  
 PACT Foundation – Partnership for Community Action and Transformation (Romania)  
 Panoptikon Foundation (Poland)  
 PDCS, o.z. (Partners for Democratic Change Slovakia) (Slovakia)  
 Peace Institute (Slovenia)

People in Need (Czech Republic)  
 People Powered (International)  
 Pestrec  
 Peter Medved, Ekopolis Foundation (Slovakia)  
 Philanthropy Europe Association (Philea)  
 PIC – Legal Center for the Protection of Human Rights and the Environment, Slovenia  
 Platform for Democracy (Slovakia)  
 Platform for International Cooperation on Undocumented Migrants (PICUM)  
 Platforma Națională a Tinerilor pentru Participare Activă/National Youth Platform for Active Participation (Republica Moldova)  
 Polémia Intézet (HUN)  
 Polish Ecological Club Mazovian Branch (Poland)  
 Polish Society of Anti-Discrimination Law (Poland)  
 Pražská kaviárna, z. s. in Czech republic  
 Protection International (Belgium – Global)  
 Psychiatria nie je na hlavu (Slovakia)  
 Quaker Council for European Affairs  
 Radi Vidi Pats, Latvia  
 Rafael Foundation (Slovakia)  
 Real People, Real Vision – Georgia  
 Reconstruction Women's Fund, Serbia  
 Red AMINVI (Spain).  
 Refugee Support Aegean (Greece)  
 RegenerAction Foundation (Poland)  
 Reporters Shield  
 Reporters United (Greece)  
 Reporters Without Borders (RSF)  
 Reproductive Health Training Center, Moldova  
 Romanian Center for European Policies (CRPE)  
 Romanian Women's Lobby -RoWL (Romania)  
 Romnja Feminist Library  
 Saplinq, o.z. Slovakia  
 SB Overseas – Support in Belgium and Overseas  
 School with Class Foundation, Poland  
 SEXUL vs BARZA Association (Romania)  
 Shipyard Foundation, Poland  
 Slatinka Association (Slovakia)  
 Slovak Fundraising Centre (Slovakia)  
 Slovak Patient (Slovakia)  
 Societatea de Planificare a Familiei din Moldova (SPFM)  
 SocietPolish Robert Schuman Foundation (Poland)  
 Society for Feminist Analyses AnA (Romania)  
 Society for Sustainable Living in the Slovak Republic  
 SOK Foundation, Poland

## SOLIDAR

Solidaridad Sin Fronteras (SSF ONG) – Spain

SolidarityNow

Soros Foundation Moldova (Republic of Moldova)

SOS Balkanroute

Stará jedále? (Slovakia)

Stefan Batory Foundation (Poland)

Stichting LOS, NL

Stowarzyszenie wspieraj?ce Inicjatyw? “Nasz Rzecznik”/ “The Association for “Our Ombudsman” Initiative (Poland)

Subcarpathian Federation of Civic Organizations PARASOL (Poland)

Taba?ka Kulturfabrik (Slovakia)

The Alliance of Active NGOs in the field of Child and Family Social Protection (Moldova)

The Bronislaw Geremek Foundation, Poland

The Daphne Caruana Galizia Foundation (Malta)

The Good Lobby Profs

The Human Rights League (Slovakia)

The International Society for Fair Elections and Democracy (ISFED)

The Rule of Law Institute, Poland

The Society for Education on Contraception and Sexuality – SECS Romania

Transparency International – Bulgaria (Bulgaria)

Transparency International EU

Transparency International Latvia

Transport & Environment

Turun Valkonauhary, Finland

Ukrainian Women’s Fund

Unhack Democracy

Union Women Center (Georgia)

UNITED for Intercultural Action (UNITED)

Universal Reading Foundation, Poland

VIA IURIS (Slovakia)

Vladislav Matej, SOCIA – Social Reform Foundation (Slovakia)

VoxPublic (France)

WeMove Europe

Whistleblowing International Network

Women’s Association for the Environment Protection and Sustainable Development, Moldova

Women’s Resource Center NGO (Armenia)

World Organisation Against Torture (OMCT), in the framework of the Observatory for the Protection of Human Rights Defenders

Xnet, Institute for Democratic Digitalisation (Spain)

Young European Federalists – JEF Europe

Združenie STORM (Slovakia)

Supported by Civil Society Europe **Related links:** Hungarian Helsinki Committee – [unofficial translation](#) of the bill Joint Analysis Hungarian Organisations – [briefing](#) Hungarian Helsinki Committee – [press release](#) CIVILIZACIO coalition – [press release](#) ECNL – [initial analysis](#) Civil Liberties Union for Europe – [statement](#) ILGA-Europe – [joint letter](#) on the law banning LGBTI public assemblies

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