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REPORT

The Observatory of Public Ethics held its first European Anti-Corruption Forum



in Brussels on 9 September



The Observatory of Public Ethics organised its first European event in Brussels on 9 September 2026. This inaugural European Anti-Corruption Forum was led by Chloé Ridel, Juliette Lelieur, Antoine Vauchez and Matthieu Caron brought together policymakers, prosecutors, academics, researchers and civil society representatives to assess the European Union's current anti-corruption framework and discuss possible avenues for reform. The conference adopted a deliberately cross-disciplinary approach, combining academic analysis, institutional experience and operational expertise to examine how the EU can better prevent, detect and prosecute corruption affecting its institutions and interests.

Discussions focused on two closely connected dimensions :

1. The first addressed prevention within the EU institutions themselves, including conflicts of interest, lobbying practices, private and foreign interference, and the effectiveness of existing integrity and oversight mechanisms.

2. The second considered enforcement and cross-border cooperation, against the backdrop of the Qatargate investigations and a changing international environment for anti-corruption enforcement. Taken together, the debates raised a broader question running throughout the conference: whether the European Union has developed a coherent anti-corruption agenda of its own, and whether it is prepared to play a stronger role in shaping and enforcing anti-corruption standards both within Europe and internationally.

A look back at the highlights of the day, in words and pictures...

DANIEL.FREUND



« We're actually not that bad. (...) Plenty of rules that exist on paper. But if you look at the actual situation: is this enforced? Is this working in practice? Well, then the situation looks very different. »

The EU has numerous transparency and ethics rules in place, including a lobby register, cooling-off periods and financial interest declarations. Yet their enforcement remains problematic. Daniel Freund notably points to a system of self-control, whereby Commissioners oversee Commissioners and MEPs oversee MEPs. He refers to Günther Oettinger, who took up 19 new positions during his cooling-off period, eight of them with organisations listed on the EU lobby register, and to Henrik Hololei, who conducted his own conflict-of-interest check after negotiating the Open Skies agreement with Qatar while receiving free flights and luxury hotel stays.

« I'm not sure we can say that sort of the soft law part is more dysfunctional than the hard law part. I think judgment's still out. »

Daniel Freund stresses that the difficulties are not limited to ethics mechanisms, but also concern judicial enforcement. Four years after Qatargate, no trial had yet taken place, leaving open the question of the effectiveness of the judicial response.

While the European Public Prosecutor has produced good results in some cases, bribery involving Members of the European Parliament does not fall within its remit. Given that the EU institutions are based in Brussels, such cases therefore largely depend on the Belgian justice system. Daniel Freund questions the extent to which Belgian authorities have the incentives to ensure that rules and laws are effectively enforced within the EU institutions.



ANTOINE.BOVE



« These inaccuracies, whether deliberate or accidental, point directly to criticisms about the declaration system introduced 14 years ago. »

Drawing on 720 declarations of interest from MEPs serving in the 2024–2029 term, the speaker highlights the shortcomings of the European Parliament's disclosure system, with some declarations containing incomplete or inaccurate information. A comparison between French MEPs' declarations to the European Parliament and to the HATVP reveals significant discrepancies: according to the study, 57% contain different information depending on the institution to which they were submitted.

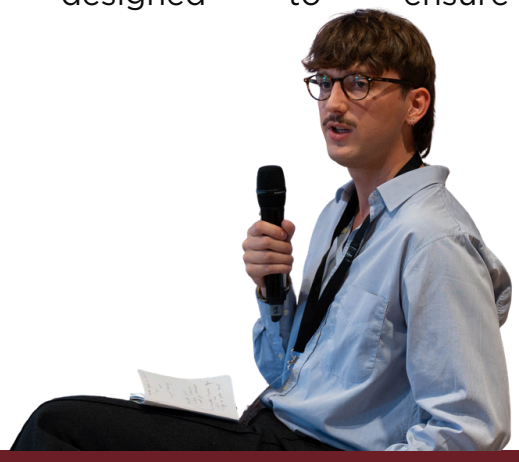
« It comes down to the fact that EP and the HATVP operate in regulatory systems with different powers and different underlying principles. »

These discrepancies stem from differences in disclosure rules and monitoring. While the European system largely relies on self-reporting, the HATVP systematically reviews declarations and has broader investigative powers. In France, any involvement in a company must be disclosed, whereas the European Parliament only requires it under certain conditions.

Enforcement also differs: European omissions mainly lead to internal sanctions, while in France, serious omissions may be referred for prosecution and result in public exposure. The combination of investigative powers, prosecution risks and public exposure thus acts as a deterrent against inaccurate or incomplete declarations.

« What can we really conclude from data we know may be incomplete? »

The speaker ultimately raises a broader question about the effectiveness of transparency based on unverified information. Making such information publicly available does not necessarily make it reliable. This creates a methodological issue for researchers and NGOs, but also a broader democratic concern: potentially inaccurate information may ultimately undermine the credibility of the very mechanisms designed to ensure transparency.



CLAIRE.NOUVIAN



« The way the Parliament actually functions itself opens an avenue for moral corruption. »

Claire Nouvian distinguishes between two forms of corruption. The first, which she describes as moral corruption, refers to practices of influence that have become pervasive within the European Parliament. The second, ideological corruption, is more closely connected to vested economic interests, particularly those of the fossil fuel industry. Her distinction highlights forms of corruption that may exist from an ethical perspective without necessarily falling within the legal definition of corruption. She illustrates this tension through the European Parliament's Fisheries Committee. Measures strengthening marine protected areas may be rejected even when they are supported by scientific evidence and by a majority of European citizens. According to Nouvian, two lines in a legislative text would be enough to prohibit the most damaging industrial fishing practices in these areas. Yet industrial fishing interests continue to weigh on decisions taken within the Committee.

« That's what we call corruption. But that's not what law calls corruption. »

For Nouvian, the resulting decisions may therefore reflect neither the general interest, nor what science says, nor what citizens want, without amounting to corruption in the legal sense. She argues that this disconnect gradually undermines citizens' trust in EU institutions. She also sees it as part of a broader shift, in which public decision-making risks moving away from the general interest and the will of citizens and becoming increasingly shaped by powerful industrial actors, particularly the fossil fuel industry.



EMILIA.KORKEA-AHO



« We know surprisingly little. »

For Emilia KORKEA-AHO, this is one of the main challenges in regulating third-country lobbying in the EU. Its scale remains largely unknown, as do the actors involved, the policy areas in which they operate and the institutions they target. Other countries have already sought to regulate such activities. The United States long stood out with the Foreign Agents Registration Act (FARA), and has since been followed by countries including Australia and the United Kingdom. In 2023, the European Commission put forward its own proposal for a directive aimed at increasing transparency around these activities. While critical of the initial text, Emilia KORKEA-AHO considers that it has improved over the course of the negotiations. The proposal notably provides for interconnected national registers, through which information on financial amounts, the countries represented and the main objectives pursued would be made publicly available.

« Foreign lobbying is not the same thing as foreign interference. »

In her view, greater transparency around foreign lobbying will not, in itself, address the broader issue of foreign interference. The proposal also raises questions about its scope: how can legitimate advocacy be protected from stigmatisation, and how should NGOs receiving foreign funding be treated? Certain activities, including diplomatic, media and academic activities, would also fall outside its scope. Implementation may prove challenging in Member States that do not yet have a general lobbying register. Emilia KORKEA-AHO nevertheless points to a potential knock-on effect: in Sweden and Denmark, transparency advocates hope that the new requirements could ultimately help pave the way for national lobbying registers.



ALBERTO.ALEMANNO



« Those rules are spread across different sources of law. »

Alberto Alemanno notes that, on paper, the EU has an extensive body of ethical rules, regularly strengthened in response to scandals and evolving public expectations. Their main weakness, however, lies in their fragmentation. They are dispersed across different legal sources and vary between institutions. Such differences are not necessarily unjustified, since MEPs, Commissioners and staff are exposed to different forms and levels of external influence. Fragmentation also affects oversight, enforcement and sanctions, with responsibilities divided among multiple bodies whose competences may overlap or complement one another, without any structured framework for cooperation.

« In practice, the ethical system is incapable to effectively prevent [...] and adequately sanction malpractices. »

Alberto Alemanno echoes Freund's assessment of the gap between the formal quality of the rules and their practical enforcement. He points in particular to weak enforcement mechanisms, due to limited independence, insufficient investigative powers and the shortcomings of self-regulation.

ÀThis is compounded by limited awareness among staff, who do not always seek guidance from their institution before engaging in conduct that may breach their obligations.

« The short answer is no, not at all. »

In his view, the interinstitutional Ethics Body will not, on its own, remedy these structural shortcomings, as the fragmentation of both rules and oversight will remain. It could, however, promote a more consistent interpretation of ethical standards and provide the institutions with a common point of reference.



LOLA.AVRIL



« So first there is an implementation problem, and second, we have a fundamental design problem. »

The EU interinstitutional body for public integrity first faces an implementation problem, as it is still not fully operational. But the main issue lies in its design. The body was originally intended to address already identified weaknesses in the existing system, including self-regulation, insufficient resources and the lack of investigative powers. Yet the mechanism ultimately adopted remains far removed from the initial project. The logic of self-regulation persists, with representatives of the institutions themselves and no binding powers. The presence of a few independent experts is not enough to ensure the body's independence, nor is simply labelling it "independent".

« Transparency is not enough. »

This weakness is all the more significant because the body has no autonomous investigative or sanctioning powers. Transparency alone cannot therefore be enough. Disclosing a meeting with a lobbyist does not make that meeting legitimate, just as making a conflict of interest visible does not make it disappear. Transparency can also be circumvented.

The Neelie Kroes case shows how a notification concerning a future job can be withdrawn before any formal procedure is opened, leaving the exchanges outside public scrutiny. This raises a broader question about what independence and transparency should actually mean. In any case, they should serve as tools for creating a more ethical environment. Ultimately, ethics rules should help prevent problematic situations from recurring and ensure a genuinely fair democratic process, rather than protect the reputation of institutions or former Commissioners.



ANTOÑIO.DELICADO



« All EU member states are evaluated by GRECO, while EU institutions themselves are not. »

Antoñio Delicado recalled that the EU has held observer status in GRECO since 2019 and that its participation has been envisaged since 1999, subject to arrangements reflecting its specific nature. He stressed the difference in treatment between Member States, all of which are evaluated by GRECO, and the EU institutions, which are not. Full participation would allow for more comprehensive external scrutiny and European peer review. The EU has already accepted external review of its anti-corruption commitments through the review mechanism of the United Nations Convention against Corruption. The European Parliament considers that the current situation undermines the coherence of the EU's integrity system and that full participation would strengthen methodological consistency, transparency, accountability and effectiveness. The Council, in its 2024 conclusions, and the Commission, in its 2023 communication, took a similar position. The European Court of Auditors also stated that it had found no convincing reason for the EU not to participate in GRECO and recommended full membership.

« GRECO's methodology has shown already that it is adapted to very different settings. »

Antoñio Delicado argued that the EU's institutional specificities would not prevent its evaluation. GRECO already applies its methodology across widely differing legal, political and judicial systems without relying on a single institutional model. Its existing evaluation rounds also provide concrete indications of which categories could be covered at EU level. The fourth round focuses in particular on parliamentarians, judges and prosecutors, while the fifth covers persons entrusted with top executive functions and law enforcement agencies. Members of the European Parliament could therefore fall within the scope of such an evaluation.



MIRANDA.DE MEIJER



« Corruption cases are by their nature secrecy. »

Miranda de Meijer explains that lengthy investigations result from both legal and factual complexities. Beyond the EPPO's limited mandate and the need to coordinate with national prosecutors, gathering evidence is particularly challenging. Unlike fraud affecting the EU's financial interests, which may leave a clear documentary, administrative or financial trail, corruption relies on secret and informal relationships. Investigators must therefore establish the nature of these relationships and navigate the sometimes fine line between unethical behaviour and corruption.

"Immunity – it is a difficult obstacle in criminal investigations."

Drawing on the Tempi train crash, Miranda de Meijer highlights the limits the EPPO can face when investigations depend on national procedures or decisions. While immunity is essential to protect the democratic process, she argues that it should not shield individuals from legitimate prosecution. The challenge is therefore to preserve this protection while allowing prosecutors to carry out their duties without facing accusations of misusing their powers.

« What do we want the EPPO to protect?

Miranda de Meijer reframes the debate over extending the EPPO's mandate: should it protect only the EU's financial interests, or also the integrity of its institutions? While this is ultimately a decision for Member States, any extension would need to be matched with adequate resources, given the EPPO's already heavy caseload and limited staff and budget. She also raises a question of public legitimacy: can citizens be expected to understand why the EPPO protects the EU's money, but not its integrity?



CHLOÉ.RIDEL



« On n'a pas pu aller aussi loin qu'on le voulait sur les mesures de prévention. »

Chloé Ridel points to a key blind spot in the Anti-Corruption Directive, which fell short on prevention. In particular, she regrets that political party financing was left out, despite being a major vehicle for corruption with potential consequences for EU decision-making and, ultimately, European citizens. Going further on prevention would, however, have meant overcoming resistance from Member States, already apparent in negotiations over the definition of offences. In this regard, she points to the offence of abuse of office and the opposition of the Italian government.

« On reste sur un système qui est celui de l'autorégulation. »

Since Qatargate, Chloé Ridel acknowledges several improvements, including the disclosure of meetings, soon to be extended to political group staff, a six-month cooling-off period, and greater transparency around outside activities. However, she argues that these changes have failed to foster a genuine "culture of integrity".

MEPs are still responsible for assessing their own potential conflicts of interest, while around 200 continue to engage in paid private-sector activities alongside their parliamentary mandate.

« Quand on vous lève votre immunité, cela ne veut pas dire que vous êtes coupable. »

Chloé Ridel also warns of growing reluctance within Parliament to lift its members' immunity, which is intended to protect the exercise of their mandate, not to shield them from prosecution for serious offences. She points to Parliament's recent refusal of a request from the European Public Prosecutor's Office to investigate an MEP. The case leads her to question the procedure itself, as decisions to lift immunity are put to a vote by MEPs in plenary.



VANESSA.FRANSSEN



« There's many institutions in the anti-corruption, but also anti-fraud architecture, and I think that's one of the weaknesses. »

Vanessa Franssen identifies the number of institutions involved as one of the weaknesses of the EU anti-corruption architecture. They have different missions, priorities and organisational cultures, and each tends to defend its own remit. She notes that this is not unique to the EU and also stresses the human factor, with cooperation between actors playing a key role. In Belgium, the complexity of the legal system is compounded by issues of experience and specialisation. She describes the Belgian authorities as going through a learning process in handling corruption cases and cautions that judicial and criminal investigations take time, as authorities must build and prove a case.

« If Parliament starts using that immunity to shield off certain practices, then we have a problem. »

Vanessa Franssen recalls that parliamentary immunity serves to preserve the balance between the judiciary and the legislature. However, she considers that it should be lifted where prosecutors present a sufficiently substantiated case, and warns against its use to shield certain practices.

« If we want to fight corruption, we need to do it in a very bottom-up way. »

Addressing public trust in the EU's ability to tackle corruption, Franssen stresses the need to change attitudes and perceptions of what is socially acceptable. In her view, fighting corruption must also begin at the individual level, while institutional and judicial responses remain necessary.



STEFAN.BLÄTTLER



« But when they don't want to play with us, we can play alone. »

For Stefan Blättler, the U.S. retreat does not undermine Europe's ability to tackle transnational corruption. Rather, it means relying more heavily on tools that are already in place. He points to the strength of the European Public Prosecutor's Office, OLAF, Eurojust, joint investigation teams and prosecutorial networks. The key, in his view, is to show greater confidence and resilience, treating the shift in the U.S. position not as a crisis, but as a situation European authorities must adapt to.

« What we are creating in our task force is mutual trust. »

Stefan Blättler describes the task force set up by the Swiss, French and British authorities as a practical way to speed up cooperation in cross-border investigations. Direct contacts between prosecutors can reduce delays linked to formal mutual legal assistance procedures by building familiarity, facilitating information-sharing and improving operational coordination. He acknowledges that no single case involving all three countries has yet emerged, but considers the task force already useful in structuring exchanges.

« We should not lose it from our eyesight. »

Asked about the idea of an international anti-corruption court, Stefan Blättler remains open to the concept, while placing it firmly in the distant future. Faced with criminal organisations operating across several jurisdictions and across different forms of crime, he envisages, in the longer term, an international jurisdiction dealing with organised crime that could also cover cross-border corruption.



JULIETTE.LELIEUR



« Le risque très clair, c'est que des entreprises américaines qui corrompent à l'étranger, et notamment en Europe, bénéficient d'une forme d'immunité. »

According to Juliette Lelieur, the U.S. withdrawal creates a risk that certain American companies will no longer be prosecuted for acts of bribery committed abroad. Europe, its States and the European Union must therefore protect themselves. Some national authorities, notably in France, the United Kingdom and Switzerland, already have experience in this field. At EU level, however, much remains to be done. The 2026 EU Anti-Corruption Directive remains focused on the Union's internal dimension and does not address either its external relations or corruption threats originating from outside the EU.

« Je ne pense pas qu'il soit nécessaire d'avoir beaucoup de formalisme. »

Juliette Lelieur considers that flexible, operational cooperation can provide a useful starting point, as illustrated by joint investigation teams, whose practice preceded their legal formalisation. She nevertheless identifies a funding difficulty. On the legal side, she is more optimistic, as procedures for the exchange of evidence and extradition generally work relatively well.

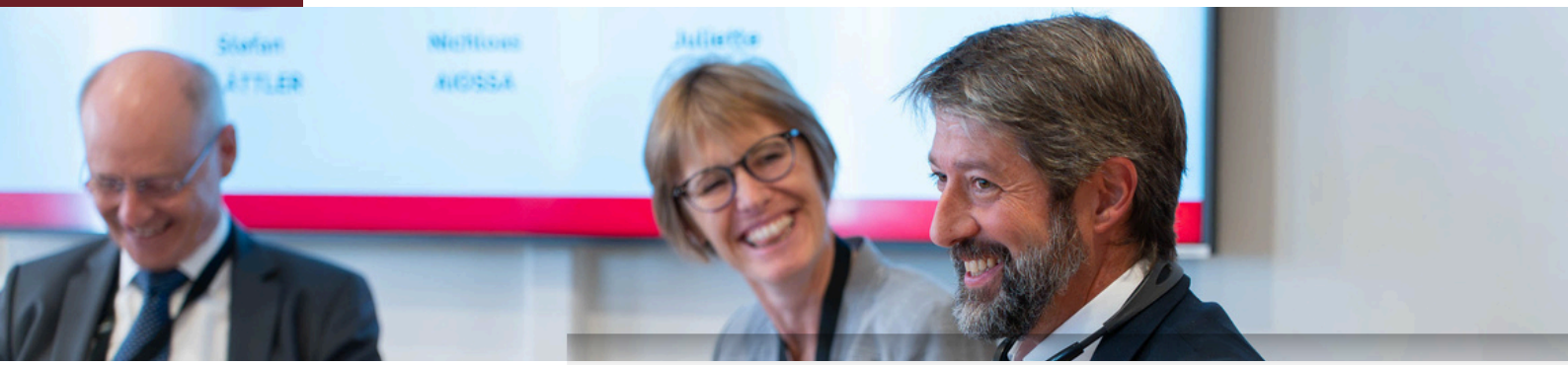
She nevertheless points to a specific difficulty concerning negotiated procedures, such as the French CJIP, which are not provided for by law in all States.

« L'Union écrit mieux qu'elle ne met en œuvre. »

Juliette Lelieur acknowledges the merit of the EU Anti-Corruption Directive while considering its drafting still insufficient. In her view, some offences should have been defined more clearly, notably trading in influence, while Member States failed to reach agreement on abuse of functions. Beyond the drafting itself, she also highlights an implementation difficulty concerning the division of responsibilities between the Union and the Member States for prosecuting transnational corruption and foreign interference.



NICHOLAS.AIOSSA



« There is an opportunity for the Europeans to take a much more prominent role in countering corruption globally. »

The gradual withdrawal of the United States from its leading role in the global fight against corruption is reshaping existing cooperation and enforcement mechanisms. Nicholas Aiossa considers that this creates greater room for the European Union to act, provided it adopts a firmer political stance towards Washington. In his view, a paradigm shift is needed for the EU to strengthen its credibility and capacity to act in global anti-corruption governance.

« As critical as I am of both the EU and their response to corruption, I can say that there is an upward positive trajectory. »

Nicholas Aiossa notes progress in the EU anti-corruption framework, notably through the Whistleblower Directive and the development of cooperation mechanisms such as the international task force. He nevertheless considers this progress insufficient. In his view, the main missed opportunity lies in the failure to build a genuine democracy shield based on robust standards of public integrity, transparency and safeguards against undue influence, whether foreign or domestic.

« The anti-corruption directive did fall short of ambition. »

Nicholas Aiossa criticises both the substance and sequencing of the EU process. In his view, an anti-corruption strategy should have preceded the directive in order to set out an overarching vision. Negotiations in the Council subsequently diluted the text's initial level of ambition, amid strong opposition from several Member States. He now fears that the forthcoming strategy could be reduced to a mere tool for supporting the directive's transposition.



RAPHAËL.GLUCKSMANN



« La corruption, c'est quelque chose de beaucoup plus perfide, de beaucoup plus profond, qui s'immisce dans les institutions. »

Raphaël Glucksmann described corruption as a structural threat to democratic governance. Referring to the case of Gerhard Schröder, he highlighted the blurring of boundaries between public office and private or foreign interests, which may undermine the independence of public decision making and European sovereignty.

« Et les démocraties, quand elles ne luttent pas contre la corruption, elles sont faibles. »

In his view, shortcomings in prevention, oversight and enforcement mechanisms fuel distrust in institutions. He argued that the measures adopted in the wake of Qatargate remain insufficiently effective and that the European Union does not make full use of the instruments available to monitor the use of public funds.

« On peut créer des instruments, mais tant qu'on n'aura pas le courage de les appliquer, la corruption continuera à miner les cités européennes. »

» The central issue, therefore, is the effective enforcement of the law.

Raphaël Glucksmann pointed to the Digital Services Act to illustrate the gap between the adoption of European rules and their implementation. In his view, combating corruption requires stronger oversight bodies and judicial institutions, but above all the rigorous enforcement of existing rules.



« C'est le moment où l'esprit civique disparaît dans une cité. C'est le moment où l'intérêt général est colonisé par les intérêts particuliers. »

In conclusion, Glucksmann offered a broader conception of corruption, drawing on Machiavelli. He described it as the erosion of the public interest in favour of private interests and the weakening of civic spirit. Anti-corruption efforts thus become a matter of citizenship, the protection of public authority and the preservation of Europe's democratic order.



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