



EUROPEAN COMMISSION

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Proposal for a  
**REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

**Establishing a Transparency and Foreign Interference Regime to Mitigate Hybrid Threats**

**THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,**

Having regard to the Treaty on the Functioning of the European Union, and in particular **Article 114 thereof**,

With due recognition of the proposal from the European Commission,

After transmission of the draft legislative act to the national parliaments,

In consideration of the opinion of the European Economic and Social Committee,

Having regard to the opinion of the Committee of the Regions,

Acting in accordance with the ordinary legislative procedure,

Whereas:

(1) Divergent national rules on transparency of foreign state-linked activities create obstacles to the functioning of the internal market.

(2) Certain activities financed or controlled by third-country public authorities may influence public-interest processes and generate systemic risks.

(3) This Regulation establishes harmonised transparency obligations in order to mitigate such risks while ensuring legal certainty for operators in the Union.

(4) This Regulation shall not affect the sole responsibility of the Member States for safeguarding national security pursuant to Article 4(2) TEU.

(5) In accordance with the principles of subsidiarity and proportionality set out in Article 5 of the Treaty on European Union, this Regulation does not go beyond what is necessary to achieve its objectives.



(6) This Regulation respects the fundamental rights, in particular Articles 11 and 12 of the Charter of Fundamental Rights of the European Union.

### **Subject matter and scope**

- I. This Regulation establishes harmonised rules on transparency, disclosure, and labelling obligations for covered entities conducting activities in the Union that are financed, directed, or materially influenced by third-country public authorities or state-controlled actors, and which may be considered hybrid threats.
- II. This Regulation applies to:
  - a) legal entities, including companies, associations, and non-governmental organisations, established in the Union;
  - b) natural persons providing professional or public-interest services in the Union;
  - c) platforms or media intermediaries distributing public-interest communications in the Union.
- III. This Regulation respects the responsibility of Member States for safeguarding national security under Article 4(2) TEU and does not affect the exercise of national intelligence or security powers.
- IV. This Regulation applies without prejudice to obligations under Union data protection, competition, or media legislation.

## **SUBTOPIC I: Transparency and Foreign Influence in the Union**

### **Article 1 – Definitions Subtopic I**

For the purposes of this regulation:

1. “Foreign state-linked entity” means any legal or natural person, organisation, or platform that is financed, directed, or materially controlled by a third-country public authority or state-controlled actor, where such control or funding is sufficient to influence the entity’s public-interest communications, advocacy, research, or other covered activities.
2. “Covered activity” indicates any public-interest communication, advocacy, research, media, or consultancy services provided in the Union.



3. “Transparency declaration” refers to a report filed with national authorities disclosing foreign funding, direction, and purpose.
4. “Systemically relevant actor” implies an entity whose activities could materially affect public discourse, markets, or cross-border services in the Union.
5. “Third-country public authority” denotes any central, regional, or local government authority of a state that is not a Member State of the Union, including public ministries, agencies, public bodies, and authorities exercising governmental powers under the law of the state in question.
6. “State-controlled actor” means any legal or natural person in which a third-country public authority holds, directly or indirectly, ownership, voting rights, or other forms of decisive influence. Used interchangeably with “state-controlled entity”.
7. “Sustained advocacy activities” means organised, repeated, or structured interactions with Union institutions for the purpose of influencing policy development or legislative processes over a longer period.

## **Article 2 – Transparency declarations**

1. All foreign state-linked entities and systemically relevant actors conducting covered activities in the Union shall submit a transparency declaration for each activity falling within the scope of this Regulation where the activity is capable of influencing public policy or democratic processes.
2. Declarations shall include, at minimum:
  - a) the identity of all foreign principals and state-linked entities providing financing or direction;
  - b) the amount and type of funding received;
  - c) the nature and extent of control or direction exercised by foreign principals;
  - d) the objectives of the activity;
  - e) any subsidiaries, affiliates, or subcontractors involved in the activity.
3. The Commission shall maintain a searchable, publicly accessible EU registry of all declarations. Information may be anonymised to the extent necessary to comply with Union data protection law. It shall be retained for a maximum period of five years unless renewed.



4. Member States shall lay down rules on penalties applicable to infringements of this Regulation. Competent national authorities shall have the power to impose fines up to €50,000 per undeclared activity (or maximum 2 % of annual turnover), or to publicly flag repeated non-compliance in the EU registry.
5. This Article shall not apply to humanitarian, cultural, or academic cooperation unless such undertakings are part of sustained advocacy activities aimed at advancing third-country interference interests.

### **Article 3 – Labelling and communications**

1. Public-interest communications, campaigns, or advocacy funded by more than 10 % by foreign state-linked entities or otherwise substantially influenced by such entities shall bear a publicly visible label indicating their foreign link.
2. This obligation applies to all covered activities, including research publications, policy recommendations, media content, and online or offline campaigns. Activities conducted by NGOs with fewer than three paid employees and individual natural persons shall be exempted.
3. Labels shall be clearly visible at the time of dissemination and remain unaltered. Platforms, publishers, and media distributing such content shall ensure compliance with this requirement.
4. Member States shall ensure that competent national authorities are empowered to take effective and proportionate measures, including fines, for failure to label correctly, while the Commission retains the right to publicly flag repeated non-compliance in the EU transparency registry.

### **Article 4: Designation of high-risk foreign influence actors**

1. The Commission may designate a foreign state-linked entity as a high-risk foreign influence actor where there is evidence of coordinated, large-scale, or repeated activities intended to influence or disrupt Union policies, institutions, or public discourse.
2. Designated entities shall:
  - a) submit enhanced transparency declarations, including information communication strategies, target audiences, and personnel directly involved in planning or executing the foreign-linked activities;



- b) label all covered activities as foreign-linked in accordance with Article 3;
  - c) cooperate with national authorities for verification of disclosures.
3. After being made public, designations shall be time-limited, reasoned, and subject to judicial review before the General Court of the European Union.

#### **Article 5: Declaration of foreign-linked influence**

1. Each Union institution shall adopt or update internal rules requiring its Members and relevant staff to declare any direct or indirect financial support, benefits, or advantages originating from a third-country public authority or state-controlled entity.
2. Those internal rules shall ensure that declarations include, where applicable:
  - a) external income,
  - b) sponsored travel, accommodation, or hospitality,
  - c) research, advisory, or speaking engagements,
  - d) positions held in foreign-linked entities.
3. Declarations shall also cover financial interests of spouses, registered partners, and dependent children, as well as external positions held by personal advisors.
4. Institutions shall ensure that declarations are updated within 30 days of any material change and published in a standardised Union-wide format.
5. This Article shall apply without prejudice to the institutional autonomy of each Union institution under the Treaties.

#### **Article 6: Conditional access to Union premises**

1. Each Union institution shall ensure that access badges, accreditations, and invitations to its premises, networks, and official communication platforms are conditional upon compliance with transparency obligations related to foreign state links.
2. Personnel or visitors linked to entities designated as high-risk under Article 4 shall be subject to conditional access, including temporary suspension or enhanced monitoring.
3. Internal rules adopted may provide for the suspension or withdrawal of access where serious or repeated non-compliance with transparency obligations is identified.



4. Decisions taken under this Article shall be reasoned and subject to review.

#### **Article 7: Prohibition of foreign-funded benefits**

1. Each Union institution shall adopt internal provisions to restrict the acceptance by its Members and staff of gifts, hospitality, or benefits funded directly or indirectly by foreign state-linked entities.
2. These provision shall ensure that:
  - a) gifts or benefits exceeding a value of €300 provided directly or indirectly to Members, staff, or their immediate family members by foreign-linked entities are prohibited unless duly authorised;
  - b) authorisation is granted only where acceptance does not give rise to risks of undue influence or reputational harm;
  - c) authorised benefits are publicly declared in accordance with Article 5.
3. No benefits shall be authorised from entities designated as high-risk foreign influence actors under Article 4.
4. Upon designation of a foreign state-linked entity as a high-risk actor under Article 4, any benefits or gifts received from that entity in the preceding 18 months which remain in the possession of Members or staff must be returned or the equivalent value repaid to the actor. Benefits already consumed shall be declared for transparency purposes.
5. All authorised benefits shall be declared publicly and be registered by the Commission.

#### **Article 8: Foreign sponsored travel**

1. Each Union institution shall adopt internal rules requiring prior authorisation for travel financed, in whole or in part, by foreign state-linked entities.
2. Such authorisation shall be refused where the travel presents a risk of undue influence or conflicts of interest, to be determined by the relevant Union institution.
3. Union institutions shall ensure that authorised travel is disclosed publicly in a timely and transparent manner.
4. This Article shall apply without prejudice to existing rules governing official missions financed by the budget.



### **Article 9: Enhanced disclosure and restrictions for dual-citizenship staff**

1. Union institutions shall require Members, staff, and officials holding dual citizenship with a non-EU state to submit additional declarations regarding:
  - a) financial interests, positions, or affiliations in the non-EU state;
  - b) benefits, gifts, or travel funded by non-EU authorities or entities
  - c) family or household members' professional or political ties to non-EU states.
2. Dual citizenship staff shall recuse themselves from decision-making or advisory roles that could directly affect politics or contracts involving the non-EU country of citizenship.
3. The Commission may impose temporary restrictions or enhanced monitoring on activities of dual-citizenship staff where a risk of undue influence is identified.

### **Article 10: Registration and oversight of foreign-linked lobbyists**

1. Any lobbyist or consulting firm representing a foreign-state linked entity, or deriving more than 10 % of its funding therefrom, must register with the Commission before engaging with Union institutions.
2. The Commission shall update the Transparency Register including:
  - a) full name and legal status;
  - b) funding amounts and sources;
  - c) targeted policy areas or legislation;
  - d) dates and types of interactions with Union staff or Members;
  - e) any subsidiaries, subcontractors, or affiliated lobbyists acting on behalf of the same client.
3. The Commission reserves the right to impose fines of up to €100,000 or 5 % of annual revenue for unregistered or undisclosed lobbying.
4. The Commission shall audit foreign-linked lobbying activities to verify compliance. Audit findings, including identified violations, shall be publicly published. Lobbyists and firms may contest audit findings before the General Court of the European Union.



### **Article 11: Enhanced scrutiny of foreign-linked employment**

1. Former Members and senior officials shall notify intended professional activities involving foreign state-linked entities for a period of three (3) years after leaving office.
2. Notifications shall be submitted to a publicly accessible EU registry maintained by the Commission, with anonymisation only where necessary to comply with Union data protection law.

### **Article 12: Restrictions to foreign diplomatic representation at the institutions**

1. Access to Union premises for foreign diplomatic representatives beyond public or ceremonial functions shall be conditional upon compliance with the transparency obligations laid down in this Regulation.
2. Union institutions shall establish procedures for the registration of foreign diplomatic representatives engaging in repeated or organised interactions relating to Union decision-making.
3. Where the information provided pursuant to paragraph 2 is incomplete, misleading, or false, the institution concerned may suspend or withdraw access credentials by means of a reasoned decision subject to review.
4. This Article shall not affect the diplomatic status or privileges of foreign diplomatic representatives under international law or the Vienna Convention on Diplomatic Relations.

### **Article 13: Transparency of diplomatic advocacy activities**

1. Foreign diplomatic missions engaging in sustained advocacy activities vis-à-vis Union institutions shall be invited to disclose the policy areas concerned and the objectives of such activities.
2. Disclosure shall be made prior to the commencement of such activities and updated where material changes occur.
3. Union institutions shall take account of compliance with this Article when determining the nature of engagement with foreign diplomatic missions.



4. This Article shall apply without prejudice to international law governing diplomatic relations.

## **SUBTOPIC II: Hybrid Threats and Covert Operations**

### **Article 14: Definitions Subtopic II**

1. “Covert foreign state-directed network” means a coordinated set of activities carried out in the Union on behalf of a third-country public authority, which involve criminal offences or unlawful conduct and are intended to influence, undermine, or exploit Union policies, institutions, or societal processes.
2. “Hybrid activity” entails any action combining economic, cyber, and political measures designed to coerce or disrupt the Union.
3. “Cyber-enabled interference” implies use of information systems or networks to disrupt, manipulate, or extract data from Union institutions, markets, or public communication channels.
4. “High-risk foreign-linked actor” refers to any foreign state-linked entity identified as posing systemic threats to Union decision-making, markets, or public discourse.
5. “Critical infrastructure” denotes all assets, systems, or networks essential for the maintenance of vital societal functions, economic activities, public health, safety, or security within the Union.

### **Article 15: Establishment of a Europol Foreign Interference Analytical Unit**

1. Europol shall establish and maintain a dedicated analytical unit responsible for assessing the activities of covert foreign state-directed networks involving criminal conduct.
2. The unit shall:
  - a) consolidate and analyse information received from Member States;
  - b) identify cross-border patterns, methods, and financing;
  - c) produce analytical reports for operational and strategic use.



3. Europol shall allocate sufficient human, technical, and financial resources to the unit, within the resources allocated to Europol in accordance with the applicable Multiannual Financial Framework (MFF).

#### **Article 16: Early-warning notifications**

1. Where Europol identifies indications of coordinated or escalating activities of covert foreign state-directed networks affecting two or more Member States, it shall issue an early-warning notification.
2. Notifications shall include:
  - a) a description of the risk;
  - b) the sectors or institutions potentially affected;
  - c) recommended preventive or mitigating measures.
3. Member States shall consider such notifications in accordance with national law.

#### **Article 17: Cooperation with Union institutions**

1. Europol shall cooperate with relevant Union institutions, bodies, offices, and agencies to support the identification and mitigation of criminal activities conducted by covert foreign state-directed networks affecting the integrity of Union decision-making.
2. Cooperation may include:
  - a) risk briefings;
  - b) anonymised trend analysis;
  - c) coordination with institutional compliance bodies.

#### **Article 18: INTERPOL cooperation**

1. Europol shall, in accordance with its mandate and existing agreements, explore cooperative arrangements with INTERPOL to strengthen the identification, analysis, and mitigation of hybrid threats affecting the Union.
2. Such cooperation may include, where appropriate:
  - a) sharing anonymised or aggregated threat information;
  - b) coordinating analytical work on cross-border criminal networks;
  - c) aligning operational recommendations in compliance with Union data protection obligations.



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3. This Article shall not affect the independence, governance, or membership of INTERPOL.

### **Article 19: Strategic coordination of hybrid threat responses**

1. The Commission shall establish a Union-level Hybrid Threat Response Task Force (HTRTF) to coordinate early mitigation strategies.
2. The HTRTF shall include representatives from:
  - a) Member States' security and intelligence service, the number of which will be subject to Member State discretion;
  - b) Europol and Eurojust;
  - c) Relevant Union institutions and agencies.
3. The HTRTF shall provide:
  - a) scenario planning for potential hybrid attacks;
  - b) coordination of cross-border operational responses;
  - c) guidance on preventive measures for critical infrastructure and institutions.

### **Article 20: Simulation exercises and institutional preparedness**

1. Union institutions shall conduct biennial simulation exercises to test resilience against hybrid threat scenarios.
2. Exercises shall involve:
  - a) disinformation campaigns targeting public discourse;
  - b) coordinated cyber attacks;
  - c) economic and logistic coercion.
3. Findings shall be reported to the Commission and incorporated into risk mitigation plans.

### **Article 21: Sanctions trigger mechanism for high-risk actors**

1. Where the Commission and/or Europol identify a foreign-linked actor or hybrid activities the Council shall be notified under the Common Foreign Security Policy (CFSP) framework.
2. The Council, acting in accordance with the CFSP, may adopt restrictive measures against such actors, including:



- a) freezing assets held in the Union;
  - b) restricting participation in Union public contracts;
  - c) temporary ban access to EU networks or facilities
3. All measures adopted shall:
- a) be proportionate and time-limited;
  - b) be coordinated with Member States to ensure consistent implementation.

### **Article 22: European elections and cyber-threat interference prevention**

1. The Commission, in coordination with Europol, shall identify and assess emerging cyber threats targeting elections across the Union, including:
  - a) attacks on electronic voting systems;
  - b) breaches of campaign communication platforms;
  - c) coordinated disinformation operations affecting public discourse.
2. Where a cyber threat is assessed to pose a significant risk to electoral integrity, the Commission shall issue guidance and recommended preventive measures to the affected Member States' electoral authorities, relevant platforms, and national cybersecurity agencies.
3. Member States shall coordinate with the Commission and Europol to implement preventive or mitigating measures, including cross-border support where cyber threats originate from or affect multiple jurisdictions.

### **Article 23: Biennial Hybrid Threat Assessment (BHTA)**

1. Europol, in coordination with the Commission, shall produce a biennial Hybrid Threat Assessment Report covering:
  - a) trends in covert political, economic, and cyber activities;
  - b) vulnerabilities of Union institutions or markets;
  - c) emerging high-risk foreign-linked actors.
2. Assessments shall be transmitted to the European Parliament, Council, and Commission for internal risk planning and advisory purposes.

### **Article 24: Biennial hybrid-threat summit**



1. In conjunction with the submission of the Biennial Hybrid-Threat Assessment (Article 25), the Commission shall organise a Biennial Hybrid-Threat Summit in The Hague to facilitate knowledge exchange and strategic planning among Member States.
2. The Summit shall include representatives from:
  - a) Member States' security, intelligence, and cyber authorities;
  - b) Europol and Eurojust;
  - c) Relevant Union institutions and agencies.
3. The objectives of the Summit shall be to:
  - a) review the findings from the BHTA Report;
  - b) share insight from hybrid incidents to have taken place since the previous Summit;
  - c) coordinate preventive measures, early-warning strategies, and cross-border responses.
4. The Commission may establish supplementary working groups or secure platforms to enable continuous exchange between Summits.

#### **Article 25: Mitigation of foreign economic coercion**

1. The Commission may act where a third-country actor uses economic measures, including trade restrictions, investment blockades, or supply-chain disruptions, to coerce or influence Union decision-making or the single market.
2. Member States must report suspected coercion within one (1) month of its detection, including actor identity, nature of measures, affected sectors, and impact.
3. The Commission, in coordination with Member States, may:
  - a) recommend or impose counter-measures, including reciprocal trade or investment restrictions;
  - b) temporarily restrict coercive third-country actors from Union procurement or contracts.
4. Counter-measures, including sanctions, shall be time-limited, proportionate, and subject to annual review.

#### **Article 26: Commission evaluation**

1. The Commission shall submit a report to the European Parliament and the Council every two years assessing the effectiveness of this Regulation.



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2. Reports shall include recommendations for updating thresholds, reporting standards, and mitigation measures in response to technological or geopolitical developments.