

Mr Harry Alex RUSZ
Ambassador Extraordinary and
Plenipotentiary
Permanent Representative
of Hungary to the Council of Europe

Ref ► CINGO/Pres/Hungary

Strasbourg, 6 June 2025

Dear Ambassador,

As you know, the Conference of INGOs through its Expert Council on NGO Law, follows the evolution and implementation of the legal framework related to Freedom of Association in Council of Europe member States.

We should herewith like to share with you an opinion that has just been published by the Expert Council on the Bill on the Transparency of Public Life which was submitted to the National Assembly of Hungary on 13 May 2025.

The opinion finds that several of the Bill's provisions are not sufficiently prescribed by the law as required when imposing restrictions on fundamental rights and freedoms guaranteed by European standards. Moreover, there must be serious doubts as to whether the adoption of any of these provisions would have any legitimate aim under European standards.

Furthermore, having regard to : the resulting preclusion of foreign support for objectives consistent with European standards; the excessive obligations to disclose personal data; the misuse of the anti-money laundering and terrorist requirements; the overbreadth of the inspection powers; the excessive nature of the penalties proposed; the absence of an effective remedy in respect of the use of the powers that would be conferred; the loss of income for which there would at least be a legitimate expectation of receiving, the measures contained in the Bill are not ones that could be considered as necessary in a democratic society.

Although debate on the Bill has now been postponed until the Autumn, the Opinion is being published now because of the significance of the threat that the implementation of its provisions would pose for the legitimate functioning of civil society organisations in Hungary.

We do hope that the postponement of its consideration becomes permanent and we would herewith like to encourage the Hungarian authorities to give further consideration to addressing the identified weaknesses.

We would also like to invite the Hungarian authorities to share any comments they may have, by 30 September 2025. The information will be brought to the attention of CINGO's forthcoming general assembly (public part-session) which will be held in Strasbourg on 13-

15 October 2025. According to CINGO's standing practice, members of the Permanent Representations are invited to attend that public part-session.

Yours sincerely,

Gerhard Ermischer
President of the Conference of INGOs

Handwritten signature of Gerhard Ermischer in black ink.

Jeremy McBride
President of the Expert Council of NGO
Law of the Council of Europe

Handwritten signature of Jeremy McBride in black ink.

Annex:

- Opinion on the Bill on Transparency of Public Life ([in English](#))