



**Position paper of the European Network for Public Ethics on  
the European Union anti-corruption package**

**April 2023**

“The European Network for Public Ethics calls on the European Commission to also include preventive measures in its proposals on the fight against corruption.

The European Network for Public Ethics brings together 12 authorities from European Union Member States active in matters of public integrity. Their missions involve maintaining the rule of law, fighting corruption and promoting good governance, which condition citizens' trust in their public officials. These authorities ensure in particular, within their States and under conditions of independence guaranteed by domestic law, the prevention of conflicts of interest in the public sphere and the regulation of revolving-door movements between the public and private sectors. The European Commission anti-corruption package should be a major step forward for European values.

The Network wishes to reaffirm that along with the criminal and civil components, the preventive aspect of the fight against corruption is essential to guarantee its effectiveness and that adoption of some common minimum standards of public integrity should usefully be already considered in the context of the proposed anti-corruption directive. Only a legislative approach to preventive measures can guarantee their full effectiveness.

The members of the Network underline the importance of preserving the specificities of the models of each Member State. However, they agree on the need to set common minimum standards to place personal and public integrity at the heart of the

principles of the European Union. Strengthening the independence, powers and resources of public integrity authorities is also major for the credibility of public action and citizens' trust in their national and European institutions.

Harmonizing the definition of conflict of interest within the Member States would be relevant in this regard. Converging legislation on the declarative obligations of public officials in terms of assets and interests and post-public service obligations would also be essential, so that public officials are subject to the same minimum standards of integrity throughout the European Union.

Declarations of interest make it possible to assess the risks of conflicts of interest and to implement measures to prevent public officials from being in a situation likely to call into question the independence and impartiality of public action.

Regulating revolving-door movements between the public and private sectors makes it possible to guarantee that the new functions of former public officials are exercised in compliance with ethic and integrity principles and without exposing them to the risk of criminal offences. Cooling-off periods or case-by-case control of these movements ensure that such risks are ruled out.

These mechanisms ensure the functioning of the internal market and contribute to citizens' trust in their institutions.

A breach of integrity in a Member State first affects the trust of the citizens of that State. But this attack can also collectively weaken public action at EU level. A set of cross-cutting measures to prevent corruption would help preserve the rule of law within a common legal space. Such actions could be accompanied by some benchmarks for measuring future progress, based on information from Member States and from private, academic and civil society stakeholders.”