



Subject: EU funding to the Palestinian Authority - conditionality, “pay-to-slay” verification, curriculum safeguards, and NGO traceability

President von der Leyen,

The European Union has long positioned itself as a principled actor in external relations, committed to democratic standards, human rights, and accountable governance. It is precisely because of this commitment that EU financial engagement carries both political weight and public responsibility.

The Commission has committed up to €1.6 billion for 2025–2027 under its comprehensive support package for Palestinian recovery and resilience¹. The Commission has already disbursed substantial tranches in 2025, including €202 million on 23 June 2025, of which €150 million was presented as support to “key public services” salaries, explicitly linked to a reform agenda².

This programme is framed by the EU–Palestinian Authority Letter of Intent of 17 July 2024, which sets reform expectations including governance, anti-corruption and an education reform track, and it reiterates that EU funds may not be made available directly or indirectly to entities subject to EU restrictive measures, nor be compatible with hate speech and incitement³.

Article 2 of the EU–PLO Interim Association Agreement⁴ makes respect for democratic principles and fundamental human rights an essential element of the Agreement⁵. This clause underpins the credibility of EU conditionality and the legitimacy of continued financial engagement.

In this context of shared commitments and stated reform objectives, we therefore seek written clarification on three issues that go to the heart of EU credibility and the integrity of EU budget support.

First, the Commission has publicly relied on assurances that the Palestinian Authority has reformed or ended the practice commonly described as “pay-to-slay.” Following the February 2025 decree restructuring the prisoner and families' payments system⁶, Palestinian Media Watch reported that on 25 October 2025 the Palestinian Authority distributed accumulated payments to prisoners and families of deceased attackers via post offices, raising the question whether the

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1055

² https://north-africa-middle-east-gulf.ec.europa.eu/news/unrwa-and-palestinian-authority-receive-eu202-million-support-ensure-key-services-ground-2025-06-23_en

³ https://enlargement.ec.europa.eu/document/download/597ce07b-fb47-4bd2-b7ef-46c4401487de_en

⁴ <https://investmentpolicy.unctad.org/international-investment-agreements/treaty-files/2469/download>

⁵ https://enlargement.ec.europa.eu/document/download/597ce07b-fb47-4bd2-b7ef-46c4401487de_en?filename=Letter+of+Intent+-+EU+PA+final.pdf

⁶ <https://www.axios.com/2025/02/10/palestinian-president-revokes-prisoner-payments-dubbed-pay-for-slay>
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incentive system was discontinued in substance or merely re-labelled⁷. Given the sensitivity of this issue and its direct relevance to EU conditionality, the Commission cannot rely on political assurances. It must rely on verifiable controls.

Second, education curriculum reform is repeatedly presented as a condition and a benchmark. The Letter of Intent explicitly links support to an education reform track including modernisation of the curriculum⁸. Where reform is presented as measurable, Parliament expects clarity - if deadlines and deliverables were real, the Commission should be able to publish what it needed, what was delivered, and what it independently verified.

Third, the Commission continues to insist on strong safeguards in external spending while the European Court of Auditors has warned that EU institutions still lack a reliable and consolidated overview of EU funding granted to NGOs, due to fragmented data systems and insufficient proactive checks on compliance with EU values (ECA Special Report 11/2025)⁹. In a context characterised by layered implementation and sub-granting, this audit finding raises legitimate concerns about traceability and reputational risk.

Against this background, we ask you to respond in writing to the following points:

1. **Conditionality and Article 2:** Does the Commission accept that Article 2 of the EU–PLO Interim Association Agreement is operational, and that “essential elements” means measurable compliance with consequences for material breach? What is the Commission’s internal test for concluding that persistent non-compliance triggers “appropriate measures”?
2. **Verification of prisoner/family payments:** Following the February 2025 restructuring, what independent verification did the Commission obtain that the incentive system rewarding imprisonment or “martyrdom” has ended in substance, rather than moved between administrative channels? Does the Commission dispute the October 2025 reporting of continued payments, and if so, what evidence supports the Commission’s position?
3. **Curriculum reform:** What concrete deliverables did the Commission require under the 17 July 2024 Letter of Intent in relation to curriculum modernisation, and what third-party verification has been conducted to confirm implementation? If verification has not been conducted, on what basis were tranches disbursed as “reform-linked”?

⁷ <https://palwatch.org/page/41634>

⁸ https://enlargement.ec.europa.eu/document/download/597ce07b-fb47-4bd2-b7ef-46c4401487de_en?filename=Letter+of+Intent+-+EU+PA+final.pdf

⁹ https://www.eca.europa.eu/ECAPublications/SR-2025-11/SR-2025-11_EN.pdf



4. **Traceability and NGO funding:** Considering the ECA's finding of fragmented NGO funding transparency, what specific controls does the Commission apply in this file to ensure traceability to final beneficiaries, including sub-grants, and compliance with EU values safeguards? Will the Commission provide Parliament with a consolidated list of NGO recipients and sub-grant chains linked to this programme?

5. **Disbursements and safeguards:** For the €150 million salary-support element within the June 2025 €202 million disbursement, what were the specific reform benchmarks assessed as met, and will the Commission publish the benchmark assessment used to justify disbursement?

We recognise the Commission's role in balancing engagement, stability, and reform. However, credibility requires that conditionality be demonstrable, documented, and enforceable. We therefore request the Commission's documented position, supported by annexed audits, benchmark assessments and verification reports, or a clear statement where such documentation does not exist.

Yours sincerely,

Nicola Procaccini

A handwritten signature in black ink, appearing to read 'Nicola Procaccini'.

Patryk Jaki

A handwritten signature in blue ink, appearing to read 'Patryk Jaki'.

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