European Commission
Directorate-General for Justice and Consumers
Ms. Marie-Hélène Boulanger
Head of Unit C.4 – Union Citizenship Rights and Free Movement

Brussels, 30 July 2025

Subject: Request for clarification in implementation guidance on the scope of Regulation (EU) 2024/900 (Transparency and Targeting of Political Advertising)

Dear Ms. Boulanger,

I am writing on behalf of the Society of European Affairs Professionals (SEAP) to support effective implementation of Regulation (EU) 2024/900 on the Transparency and Targeting of Political Advertising (TTPA), which will apply from 10 October 2025.

We share the Regulation's goal of greater transparency around paid political advertising and targeted techniques.

In that spirit, we would welcome clarification on how the definition of "political advertising" in Article 2(2) should apply to organic (non-remunerated) posts published by organisations and individuals registered in the EU Transparency Register, for example on LinkedIn, X or Bluesky, when expressing public positions on policy or legislative matters. While we understand that the TTPA is aimed at paid political advertising services, a literal reading could create uncertainty as to whether such unpaid communications fall within scope.

We note that Article 1(2) contains a safeguard for editorial content not promoted through payment. However, terms such as "editorial responsibility" and "political opinion" may be subject to differing interpretations, making it difficult to assess consistently whether organic, non-paid content is out of scope.

To provide legal certainty and avoid unintended chilling effects on legitimate participation in democratic debate, we kindly request that the forthcoming implementation guidance and/or Q&A confirm that unpaid, non-remunerated posts by organisations and individuals registered in the EU Transparency Register are not considered "political advertising" under the TTPA. If helpful, the guidance could include illustrative scenarios showing (i) examples of organic posts that are out of scope and (ii) when content becomes in scope (e.g., when promoted for remuneration or provided as a political advertising service).

SEAP would be pleased to contribute practical examples of typical communications and to participate in any stakeholder meetings on the implementation of the TTPA.

We remain at your disposal to discuss this request further.

Yours sincerely,

Emma Brown
President
Society of European Affairs Professionals (SEAP)