

25 February 2026

**Her Excellency Ursula von der Leyen**  
President of the European Commission  
Berlaymont Building, Rue de la Loi 200  
B-1049 Brussels, Belgium

**Re: Request for an Investigation into the Conduct of Former Commissioner Peter Mandelson During and After his Mandate as EU Trade Commissioner (2004–2008) and Referral to the Independent Ethics Body**

---

Dear President von der Leyen,

We write to you in our capacity of professors of EU Law and members of The Good Lobby Profs, a non-partisan civil society organisation dedicated to strengthening the integrity of European democratic institutions. We respectfully urge you to open a formal investigation into the conduct of Lord Peter Mandelson during and after his tenure as European Commissioner for Trade (2004–2008), to refer this matter to the Independent Ethical Committee, as well as the Interninstitutional Body for Ethical Standards established pursuant to the 2024 Interinstitutional Agreement.

**I. Background and the Scope of the EU Dimension**

On 23 February 2026, British Metropolitan Police arrested Lord Mandelson on suspicion of misconduct in public office in connection with the alleged leaking of confidential government information to convicted sex offender Jeffrey Epstein. The investigation, triggered by documents released by the United States Department of Justice, focuses primarily on Mandelson's role as a Cabinet minister in the government of Prime Minister Gordon Brown (2008–2010).

However, media coverage – including that of Politico Europe — has conspicuously omitted that Lord Mandelson served as European Commissioner for Trade from November 2004 to October 2008. This period encompassed some of the most sensitive multilateral and bilateral trade negotiations in recent European history, including the Doha Development Round of the WTO, EU–India and EU–ASEAN Free Trade Agreement negotiations, and market access disputes of significant commercial value to European industries. The relationship between Mandelson and Epstein is now documented as spanning at least 2002 to 2011, meaning it ran throughout, and significantly overlapped with, his full period of service as a senior EU official. There are already indications Mandelson gave advance notice to Epstein of an EU bailout in 2010.

Epstein operated as a financial intermediary and information broker for an extensive network of wealthy clients, hedge funds, and powerful private interests. The commercial value of advance knowledge of EU trade negotiating positions, market access timelines, or internal Commission assessments would have been potentially immense for such a network. It would be constitutionally and institutionally untenable for the European Commission to remain passive while the UK authorities investigate

only the *national* dimension of Mandelson's alleged conduct, without examining whether his obligations as a Commissioner were simultaneously violated.

## II. The Applicable Legal Framework

Commissioners are bound by obligations of integrity and discretion during but also beyond the end of their mandate. Article 245 TFEU requires Commissioners to behave with integrity and discretion as regards the acceptance of certain appointments or benefits after their term of office. Article 17(3) TEU further provides that Members of the Commission shall be completely independent in the performance of their duties and shall neither seek nor take instructions from any government or other institution, body, office or entity.

The Code of Conduct for Members of the European Commission explicitly prohibits the use of confidential information obtained during the mandate for any purpose other than the exercise of official duties. There is no evident limitation period that would preclude an institutional inquiry by the Commission itself into whether these obligations were violated. The Commission has both the competence and, we would argue, the duty to investigate under Articles 17 and 245 TFEU, the Code of Conduct, and the Commission's own institutional mandate to uphold the rule of law.

## III. Requests to the President

In light of the foregoing, I respectfully make the following requests:

First, we call upon you, as President of the Commission, to formally open an institutional inquiry into whether Lord Mandelson used, disclosed, or misappropriated any confidential information obtained in his capacity as European Commissioner for Trade (2004–2008) for the benefit of Jeffrey Epstein, his associates, or any third party with a financial or commercial interest in EU trade policy. This must include:

- a comprehensive review of the 'Epstein files' released by the US Government in order to identify all communications between Peter Mandelson, Epstein and related parties during his period as Trade Commissioner;
- a review of Commission files related to Peter Mandelson's activities as Trade Commissioner in order to identify any behaviour or activity which would indicate a conflict of interest or any other activity breaching EU rules.

Second, we call upon you to refer this matter to both the the Independent Ethical Committee, as well as the Interninstitutional Body for Ethical Standards established pursuant to the 2024 Interinstitutional Agreement, requesting that the Committee and the Body examine whether Lord Mandelson's conduct during and after his mandate is consistent with his obligations under Article 245 TFEU, Article 17(3) TEU, and the Code of Conduct for Members of the Commission. The Independent Ethical Committee is precisely the appropriate forum for such a determination, given its mandate to assess potential breaches of ethical obligations by EU Commissioners during and after their mandate.

Third, we call upon the Commission to proactively coordinate with UK law enforcement authorities to ensure that any ongoing criminal investigation in the United Kingdom has full access to any Commission records, communications, or

documentation from Lord Mandelson's tenure that may be relevant to the broader investigation, consistent with applicable data protection and institutional rules.

Fourth, we call upon the Commission to publish, without undue delay, a public statement clarifying the steps it intends to take in response to these concerns – also in relation to the European Parliament's Priority question for written answer P-000434/2026/rev.1 to the Commission, Rule 144 Aodhán Ó Ríordáin (S&D) – in the interest of institutional transparency and public trust in European governance.

#### **IV. The Reputational and Constitutional Stakes for the Commission**

The Commission has rightly emphasised institutional integrity as a cornerstone of its mandate during this legislative term. The failure to act in a case as publicly visible as this one – where a former senior EU official stands arrested, where the relationship between that official and a criminal information-broker spans his entire EU mandate, and where the EU trade dimension has been entirely absent from public and institutional debate – would constitute a significant failure of the Commission's duty of self-governance, as stemming from the principle of good administration.

Inaction would risk compounding what is already a reputational crisis for European institutions, at a moment when the Commission's credibility and democratic legitimacy are under sustained pressure. The asymmetry between a proactive UK police investigation and EU institutional silence would be constitutionally indefensible and would set a deeply troubling precedent regarding the enforceability of post-mandate obligations for senior EU officials.

We remain at your disposal should you or your services require any further information regarding this request, and I am happy to discuss the legal and institutional dimensions of this matter directly.

Yours faithfully,

**Professor Alberto Alemanno**

Jean Monnet Professor of EU Law, HEC Paris

Founder, The Good Lobby | Democracy Fellow, Harvard Kennedy School

**Professor Laurent Pech**

Professor of EU Law, UCD

Acting on behalf of The Good Lobby Profs  
(list of signatories)

Dr Vigilencia Abazi, Maastricht University

Professor Joana Covelo de Abreu, University of Minho

Prof Emilia Korkea-Aho, University of Eastern Finland

Professor Alberto Alemanno, HEC Paris

Professor Odile Ammann, University of Lausanne

Professor Matej Avbelj, New University

Professor Aslı Ü. Bâli, UCLA School of Law

Professor Petra Bárd, Eötvös Loránd University and CEU  
Professor Samo Bardutzky, University of Ljubljana  
Professor Gavin Barrett, University College Dublin  
Dr Uladzislau Belavusau, T.M.C. Asser Institute  
Professor Paul Blokker, University of Bologna  
Dr Piotr Bogdanowicz, University of Warsaw  
Professor Bojan Bugarcic, University of Sheffield  
Dr Graham Butler, Aarhus University  
Professor Antoine Buyse, Utrecht University  
Dr Matthieu Burnay, Queen Mary University of London  
Professor Başak Çalı, Hertie School  
Professor Carlos Closa, Spanish National Research Council  
Professor Ramona Coman, Université Libre de Bruxelles  
Dr John Cotter, Keele University  
Dr Kati Cseres, University of Amsterdam  
Dr Eglė Dagilytė, Anglia Ruskin University  
Dr Tom Gerald Daly, Melbourne School of Government  
Professor Giacomo Di Federico, University of Bologna  
Professor Peter Van Elsuwege, Ghent University  
Dr Cassandra Emmons, Harvard University  
Dr Pawel Filipek, Krakow University of Economics  
Dr Andrew Forde, Dublin City University  
Professor Amandine Garde, University of Liverpool  
Professor Lech Garlicki, Washington University in St. Louis  
Professor Iris Goldner Lang, University of Zagreb  
Dr Barbara Grabowska-Moroz, CEU Democracy Institute  
Dr Joelle Grogan, Middlesex University London  
Professor Xavier Groussot, Lund University  
Professor Michaela Hailbrunner, University of Gießen  
Professor Gabor Halmai, European University Institute  
Dr Daniel Hegedüs, The German Marshall Fund of the United States  
Professor Christophe Hillion, University of Oslo  
Professor Hristo Hristev, Sofia University  
Professor R Daniel Kelemen, Rutgers University  
Professor Dimitry Kochenov, CEU Democracy Institute  
Professor Tomasz Tadeusz Koncewicz, University of Gdańsk  
Dr Kriszta Kovács, WZB Berlin Social Science Center  
Jaka Kukavica, European University Institute  
Dr Dilek Kurban, Hertie School  
Professor Rui Lanceiro, University of Lisbon  
Professor Rick Lawson, Leiden University  
Professor Christoph Möllers, Humboldt University  
Professor Jan-Werner Müller, Princeton University  
Professor Kalypso Nicolaïdis, European University Institute  
Raphael Oidtmann, Mannheim Law School  
Professor Tommaso Pavone, University of Arizona  
Professor Laurent Pech, Middlesex University London  
Professor Vlad Perju, Boston College Law School  
Professor Thomas Perroud, Panthéon-Assas University (Paris II)  
Dr Davor Petrić, University of Zagreb

Professor Roman Petrov, National University Kyiv-Mohyla Academy  
Professor Sébastien Platon, University of Bordeaux  
Professor Jiří Přibáň, Cardiff University  
Professor Daniel Sarmiento, Complutense University of Madrid  
Prof Nika Bačić Selanec, University of Zagreb  
Julian Scholtes, European University Institute  
Professor Wojciech Sadurski, University of Sydney and University of Warsaw  
Professor Kim Lane Scheppele, Princeton University  
Professor Alessandra Silveira, University of Minho  
Prof Eleanor Spaventa, Bocconi University  
Professor Maciej Taborowski, University of Warsaw  
Dr Rui Tavares, New York University  
Dr Radosveta Vassileva, Middlesex University London  
Prof Arnaud Van Waeyenberge, HEC Paris  
Professor Marlene Wind, University of Copenhagen  
Professor Jan Wouters, KU Leuven  
Professor Mirosław Wyrzykowski, University of Warsaw  
Dr Witold Zontek, Jagiellonian University  
Professor Lorenzo Zucca, King's College London