



**Annual report on the functioning  
of the Transparency Register  
2024**

**Presented by the Transparency Register Management Board**

**to**

**the European Parliament, the Council of the European Union and the  
European Commission**

An annual report on the functioning of the Transparency Register is to be submitted to the signatory institutions, in line with Article 13(3) of the Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register.

This report sets out factual information on the Transparency Register, its content and any changes concerning it in 2024. It also reports on the conditionality and complementary transparency measures, which are in force in the signatory institutions in the same year.

## Contents

I. Executive summary .....	3
II. Introduction .....	3
III. Governance.....	4
IV. Conditionality and complementary transparency measures.....	5
V. Activities of the Secretariat.....	9
1. Data quality monitoring .....	10
2. Helpdesk service .....	14
3. Investigations.....	14
4. 2024 Management Board meeting .....	15
5. Guidance and awareness raising .....	16
6. Technical developments.....	17
7. ECA audit on the Transparency register .....	17
8. European Ombudsman decision in case 532/2023/FA .....	17
VI. Statistics .....	18
1. Development of the Transparency register .....	18
2. Interests represented .....	19
3. Geographical data .....	20
4. Transparency register data views .....	21
VII. Conclusions .....	22

## I. Executive summary

The year 2024 was again a year of intense scrutiny and activity for the Transparency register, with the European elections amplifying the level of public oversight, leading up to a new institutional cycle. The use of the register as an information and reference tool for interest representation activities carried out at EU level increased further, as shown by the rise in applications for registration year-on-year.

While the legislative handover may have brought about a brief pause in interest representation activities in the 3rd quarter of the year, the new mandate kickstarted a fresh cycle of interest representation towards the EU institutions, with registration in the Transparency register rising strongly towards the end of the year.

As a public reference tool, considerable expectations are put on the register in terms of its functionalities and the reliability of its content. In 2024, the website saw a major IT overhaul, factoring in this process several useful recommendations and suggestions made, respectively, by the European Court of Auditors and the European Ombudsman. Improvements to the IT infrastructure brought about simplifications of the Transparency register platform for its users, as demonstrated by the drop in the number of helpdesk requests by applicants and registrants and inquiries from the general public.

The Secretariat of the register increased its monitoring of the data quality of existing registrations, covering approximately one third of the register's total population in 2024. In parallel, administrative experience in 2024 showed the growing familiarity of the register's users with the complaints mechanism, leading to more complex and meaningful investigations and helping reduce the number of manifestly inadmissible or inaccurate complaints.

These activities are presented in more depth in the report.

## II. Introduction

The Transparency register is the primary reference tool for interest representation at EU level. It is a database designed to provide the public with up-to-date information about interest representation activities aimed at influencing the current law-making and policy implementation processes of the EU institutions. It helps to keep track of which interests are being represented to the institutions, who is representing them and on whose behalf, what legislative initiatives are being targeted and what resources are devoted to the related activities in human and financial terms.

It is the EU's key tool for promoting transparent and ethical interest representation and increasing the openness and visibility of participation by stakeholders and civil society in the EU's democratic decision-making process. By signing up to the Transparency register, interest representatives commit to a code of conduct setting out the ethical and behavioural rules and principles to be fully respected in their interactions with the EU institutions and their lobbying activities towards the latter.

The Transparency register is operated jointly by the European Parliament, the Council of the European Union and the European Commission, on the basis of the Interinstitutional Agreement (IIA) adopted in 2021<sup>1</sup>.

In line with Article 13 of the IIA, this report contains factual information on the Transparency register, its content and any changes that took place during the reporting period. It also provides an overview of the conditionality and complementary transparency measures currently in force in the signatory institutions.

### III. Governance

The Transparency register has a two-level governance structure: a Management Board that provides general oversight and direction, and a Secretariat responsible for day-to-day management.

The Management Board ensures the overall implementation of the IIA. It is responsible for identifying the annual needs and priorities for the Transparency register, adopting the annual report on its functioning and issuing general instructions to the Secretariat. It is also tasked with examining and deciding on any requests to review measures that have been applied by the Secretariat, following an investigation.

The Management Board is composed of the Secretaries-General of the European Parliament, Council and Commission. They meet at least once a year and each Secretary-General holds the chair for an annual term. The Secretary-General of the Commission chaired the Management Board in 2024; they held their annual meeting on 19 April 2024, adopting the annual report for the previous year and the upcoming budget and priorities for the register.

The Secretariat provides guidance on the registration process to interest representatives, monitors and verifies the eligibility of applications and checks the quality of information provided by registrants in its targeted monitoring.

It handles complaints concerning alleged breaches of the code of conduct by registrants and can open investigations into registrants' ongoing eligibility and observance of the code of conduct and apply measures if it has not been observed. The Secretariat raises awareness about the Transparency register (see section V) and reports on all its activities in the annual report.

The Secretariat is made up of staff from the three signatory institutions. In 2024 this amounted to 11 full-time equivalent staff members. It is represented at the Management Board and in public by a Coordinator, who oversees daily operations. In 2024, the head of the unit responsible for transparency in the General Secretariat of the Council was the designated Coordinator of the Secretariat.

Detailed information on the governance of the Transparency register can be found in the dedicated Governance section on the Transparency register's website.

---

<sup>1</sup> Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register, OJ L 207, 11.6.2021, p. 1.

## IV. Conditionality and complementary transparency measures

The European Parliament, Council and Commission each adopt, by means of individual decisions, conditionality measures whereby registration in the Transparency register is a precondition for interest representatives to be able to carry out certain key interest representation activities. The three institutions may also adopt complementary transparency measures to further encourage registration and strengthen the joint framework established by the IIA.

Other EU institutions, bodies, offices and agencies, as well as Member States in relation to their permanent representations to the EU, may notify the Management Board of conditionality or complementary transparency measures that they adopt, and ask for these to be published on the Transparency register website.

Transparency measures are already in place in the European Economic and Social Committee and the European Committee of the Regions. In 2024, the Secretariat received questions from other EU bodies that were looking into this possibility.

All Member States have committed to apply a conditionality measure during their Presidency of the Council and in the six months preceding it, by making meetings between their respective Permanent Representative and Deputy Permanent Representative to the EU and interest representatives conditional on the latter registering in the Transparency register.

That conditionality measure applies to meetings organised with the Permanent Representative and Deputy Permanent Representative when acting in their capacity of acting or incoming Presidency of the Council<sup>2</sup>. Therefore, interest representatives are not able to participate in such meetings unless they are registered. In 2024, this applied to Belgium<sup>3</sup> and Hungary<sup>4</sup> as they were holding the Presidencies of the Council of the EU, and Poland<sup>5</sup> as the incoming Presidency.

On 15 February 2024, Belgium notified the Management Board of measures of permanent nature regarding the participation of its permanent representation to the EU in the Transparency Register. This includes, as of 1 July 2024, a requirement by Belgium's Permanent Representative and Deputy Permanent Representative to meet only with registered interest representatives and to publish the details of all such meetings on the permanent representation's website.

A list of the [conditionality and other transparency measures](#) currently in force in the EU institutions is outlined below and can also be found on the dedicated page of the Transparency register website.

---

<sup>2</sup> [https://transparency-register.europa.eu/document/download/0c791fb8-e64d-47cc-a3b0-175913788b7c\\_en?filename=Transparency%20register%20-%20Member%20states%27%20political%20declaration.EN\\_.pdf](https://transparency-register.europa.eu/document/download/0c791fb8-e64d-47cc-a3b0-175913788b7c_en?filename=Transparency%20register%20-%20Member%20states%27%20political%20declaration.EN_.pdf).

<sup>3</sup> [Transparency | FPS Foreign Affairs - Foreign Trade and Development Cooperation.](#) .

<sup>4</sup> <https://eu-brusszel.mfa.gov.hu/assets/31/82/25/ef443ff8e903be0cd88754c45fb9b53ce7fa0f0f.pdf>.

<sup>5</sup> <https://www.gov.pl/web/eu/transparency>.

## *European Parliament*

In 2024, the European Parliament's measures that require interest representatives to be registered when they are given a platform on Parliament premises have included: rules on events, MEPs' intergroups and unofficial groupings, former MEPs and long-term access to the premises.

Active participation or co-organisation of events held on Parliament premises is conditional on prior registration on the Transparency register<sup>6</sup>, meaning that any interest representative acting in an event as a speaker, moderator or any other active role or involved from a logistical, practical or financial point of view must be registered. These rules apply in addition to the already established conditionality measure requiring<sup>7</sup> that speakers at Parliament's committee hearings are registered prior to the hearing.

Only registered interest representatives may participate in the activities of intergroups and unofficial groupings<sup>8</sup> on Parliament's premises, by offering support to them, or by participating or co-hosting their events. Following the constitution of the Parliament after the elections, MEPs have also set up new intergroups. The information published by the Parliament about these intergroups is mirrored on the Transparency Register and registrants can be transparent about which groupings they support.

The start of the legislative term also saw the Parliament apply its conditionality measure requiring former MEPs to observe a six-month cooling-off period before they register and engage in interest representation activities with sitting MEPs<sup>9</sup>. The code of conduct for MEPs regarding integrity and transparency mirrors this rule<sup>10</sup>.

In terms of access to decision-makers for lobbying purposes, only registered interest representatives may apply for long-term access to Parliament premises<sup>11</sup>. On 31 December 2024, of the 13 118 entities registered in the Transparency register, 2 620 had at least one accredited representative permitted to access Parliament's premises.

On 31 December 2024, there were 7 367 active badges. 2024 saw a major improvement of the accreditation process with the roll-out of the Parliament's new online application platform<sup>12</sup>. As before, the names of people with accreditation to enter the Parliament's premises for interest representation purposes on behalf of a registered entity are published on that entity's register profile page.

All MEPs are required to publish online information on their scheduled meetings with interest representatives falling under the scope of the interinstitutional agreement<sup>13</sup>. This means any meeting relating to parliamentary business (report, opinion, resolution, plenary debate or urgency) held with the purpose of influencing the policy or decision-making process of the European institutions, whether in person or remote.

The obligation applies regardless of whether MEPs attend the meeting personally or

---

<sup>6</sup> Decision of the Bureau of the European Parliament of 12 June 2023

<sup>7</sup> Article 8 of the Decision of the Bureau of the European Parliament of 24 June 2024

<sup>8</sup> EP Rules of Procedure: Rule 35(5) and 36(5).

<sup>9</sup> Decision of the Bureau of the European Parliament of 17 April 2023.

<sup>10</sup> Article 9 of the Code of Conduct for Members of the European Parliament.

<sup>11</sup> Rule 126 of the European Parliament's Rules of Procedure.

<sup>12</sup> <https://accredit.europarl.europa.eu/>

<sup>13</sup> Article 7 of the Code of Conduct for Members of the European Parliament

Member's parliamentary assistants attend on their behalf. The published meetings are linked to the registrants' respective profiles on the Transparency Register. As of 31 December 2024, MEPs had declared 20 030 meetings for 2024. Taking account of their specific role and mandate, it is recommended<sup>14</sup> that MEPs meet only those representatives who are registered in the Transparency register.

In addition, rapporteurs are required to add a 'declaration of input' to their draft reports or opinions, listing the organisations or people from whom they received input on matters pertaining to the subject of the initiative<sup>15</sup>.

To improve transparency and encourage registration, Parliament sends automatic alerts to registrants who have specified an interest in particular policy areas, notifying them of the work done by the relevant Parliamentary committees.

During the reporting period, rules to require management staff from the Parliament to meet only with registered interest representatives and to publish information on these meetings were being drawn up by Parliament<sup>16</sup>.

### *Council of the EU*

As set out in Council Decision (EU) 2021/929<sup>17</sup>, registration in the Transparency register is a precondition for interest representatives to meet the Secretary-General of the Council or the Directors-General.

The same rule applies for participation by interest representatives, in their professional capacity, in thematic briefings organised by the General Secretariat of the Council (where appropriate and after consulting the Presidency) or as speakers at public events organised by the General Secretariat.

In 2024 new internal instructions sought to further implement the conditionality principle. Since 1 January 2025 these events are internally registered. A broad definition of meetings is applied, intended to cover 'any scheduled encounter with one or more interest representatives, either in person or through any form of remote connection, whether on the Council premises or not, and including during missions'.

In addition, while encounters of a purely private or social nature and unscheduled or spontaneous meetings are not covered, the new rules instruct staff to refrain from engaging in substantive discussions about the formulation or implementation of policy or legislation, or the decision-making processes of the European Council or the Council, in any such meetings.

In addition, before any meeting with any interest representatives, all staff of the General Secretariat of the Council are requested to check the credentials of interest representatives in order to ensure that they have an active entry in the Transparency register. If not, these staff should carefully assess how appropriate the meetings are and consult with their line manager<sup>18</sup>.

---

<sup>14</sup> European Parliament Rules of Procedure (Rule 11(2)).

<sup>15</sup> Article 8 of the Code of Conduct for Members of the European Parliament

<sup>16</sup> The rules were subsequently adopted in May 2025.

<sup>17</sup> OJ L 207, of 11.6.2021, p. 19.

<sup>18</sup> Staff note 17/24 of 13 December 2024. Also, Staff note CP 42/22.

As a further measure to improve transparency and encourage registration, invitations to interest representatives to attend a meeting of the Council or its preparatory bodies should be conditional on them being registered in the transparency register.

Their registration number should be recorded on the provisional agenda. The Council's annual report on the implementation of Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents includes relevant information about the attendance of interest representatives at meetings of the Council or its preparatory bodies<sup>19</sup>.

### *European Commission*

At the start of its new mandate in 2024, the Commission took new transparency measures, strengthening its internal regime linked to the Transparency register and significantly extending its mandatory use of the register in relation to contacts between its representatives and staff and (registered) interest representatives.

The Commission applied already Transparency register requirements to Commissioners, their cabinet members and Directors-General: these are allowed only to meet interest representatives registered in the Transparency register and must provide public details of all such meetings<sup>20</sup>.

On 4 December 2024, the Commission adopted Commission Decisions (EU) 2024/3081<sup>21</sup> and (EU) 2024/3082<sup>22</sup>, which have applied since 1 January 2025. These extend the above requirements on meetings with interest representatives to all Commission staff holding management functions, including the (Deputy) Secretary-General, the (Deputy) Directors-General and all Directors and Heads of Unit or equivalent.

In addition, they introduce an obligation to take and publish minutes of all meetings that Commissioners, members of their cabinet or Commission management staff hold with (registered) interest representatives.

In 2024, the Commission published information on meetings<sup>23</sup> held with 1 980 registrants. Those registrants held 1 693 meetings with Commissioners and/or members of their cabinets and 673 meetings with Directors-General at the Commission<sup>24</sup>.

---

<sup>19</sup> Guidelines on the occasional attendance of third parties, including interest representatives, at meetings of the Council or its preparatory bodies, 22 July 2021.

<sup>20</sup> These obligations are laid down for Commissioners and their cabinets in Article 7 of Commission Decision of 31 January 2018 on a Code of Conduct for the Members of the European Commission (C(2018)700) (OJ C 65, 21.2.2018, p. 7). The publication requirements apply since 2014.

<sup>21</sup> Commission Decision (EU) 2024/3081 of 4 December 2024 on transparency measures concerning meetings held between Members of the Commission and interest representatives, and repealing Decision 2014/839/EU, Euratom, OJ L, 2024/3081, 5.12.2024.

<sup>22</sup> Commission Decision (EU) 2024/3082 of 4 December 2024 on transparency measures concerning meetings held between Commission staff holding management functions and interest representatives, and repealing Decision 2014/838/EU, Euratom, OJ L, 2024/3082, 5.12.2024.

<sup>23</sup> These details consist of the date of the meeting, the location, the name of the Commissioner and/or cabinet member or Director-General, the name of the interest representative and the subject of the meeting. They are published within 2 weeks of the meeting taking place. As mentioned, as of 1 January 2025 all Commission management staff are also required to publish such information.

<sup>24</sup> The same registrant may be concerned by more than one meeting.



That information, in addition to being published on the Commission website<sup>25</sup>, is also made available as a list of meetings on the pages of the registrants concerned in the Transparency register. The Commission also makes publicly available consolidated datasets of meetings held with registered interest on the [European data portal](#), in machine readable and Excel format. This provides interested parties and the public with accessible information that is comprehensive and easily processed to extract the relevant information.

The Commission appoints only registered interest representatives to Commission expert groups, in line with its internal rules<sup>26</sup>. This requirement (prior registration) applies to both Type ‘B’<sup>27</sup> and ‘C’<sup>28</sup> members. If these members are suspended or removed from the Transparency register, the Commission suspends them from the expert group(s) on which they sit until their registration has been re-established.

As a further measure to improve transparency and encourage registration, the Commission sends automatic alerts to registrants who have specified an interest in particular policy areas, notifying them of the launch of public consultations or roadmaps in these fields. Contributions to these consultation exercises from registrants are also processed separately from those of non-registered respondents<sup>29</sup>. These contributions can be found on the registrants pages in the register.

## V. Activities of the Secretariat

The Management Board determined the following annual priorities for the Transparency register for 2024:

- ensuring further progress on data quality by fine-tuning the monitoring activities, to include tailored screenings of content in the register, including intermediaries or non-commercial registrants who may act as vectors of foreign influence on EU policy-making;
- state-of-the-art technology for the register, by introducing additional features to modernise the IT tool and adapt it to accessibility and visual identity requirements;
- continued awareness-raising activities;
- synergies with other EU bodies, including a reflection paper on the implementation of Article 11 of the IIA, to provide the basis for facilitating their involvement in the Transparency register.

The Secretariat worked on delivering on these annual priorities, including by stricter checking of new applications, continued helpdesk assistance and introducing a number of improvements to the IT platform, in conjunction with its daily activities, detailed below.

---

<sup>25</sup> In particular, the dedicated transparency webpages of the websites of the Members of the Commission, and of Directorates-General of the Commission respectively.

<sup>26</sup> Article 8 of Commission Decision of 30 May 2016 establishing horizontal rules on the creation and operation of Commission expert groups (C(2016)3301).

<sup>27</sup> Individuals appointed to represent a common interest shared by stakeholders in a particular policy area.

<sup>28</sup> Organisations in the broad sense, including companies, associations, non-governmental organisations, trade unions, universities, research institutes, law firms and consultancies.

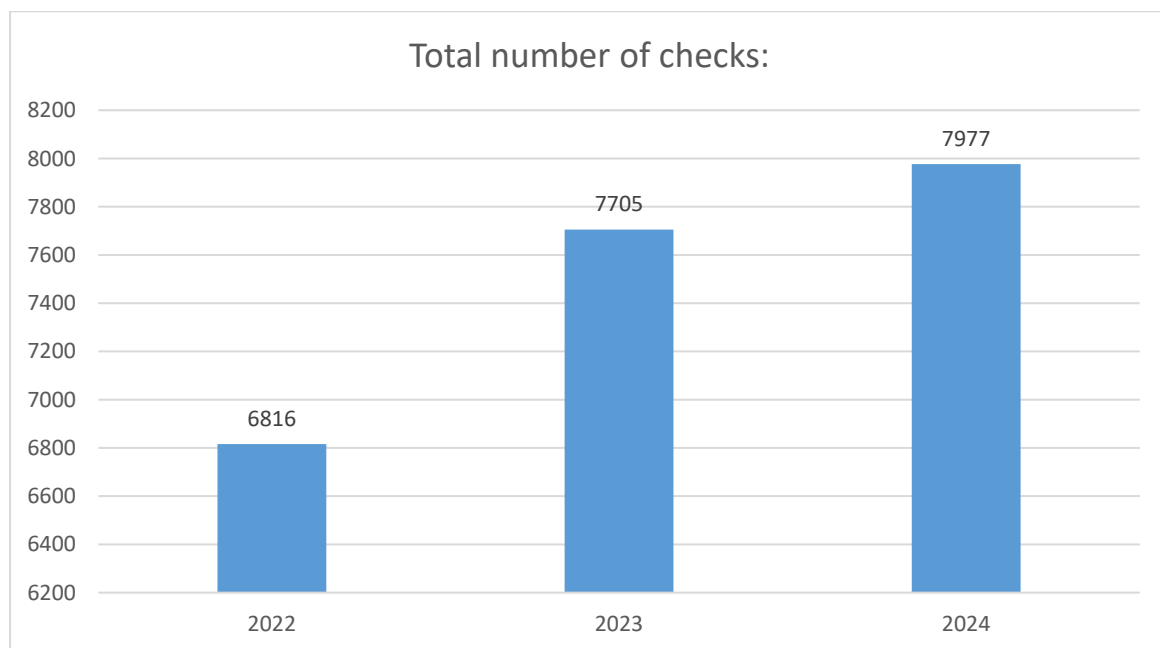
<sup>29</sup> Better Regulation Guidelines of the European Commission (SWD(2017)350), in particular [Chapter VII Guidelines on Stakeholder Consultation](#).

## 1. Data quality monitoring

The Transparency register publishes information about current lobbying activities by interest representatives related to the recent formulation or implementation of the policy cycles and decision-making processes of the EU institutions. This includes specific details on the main legislative proposals or policies targeted. As a result, the data is continuously changing, with some interest representatives registering only for a limited period and others remaining in the database for longer.

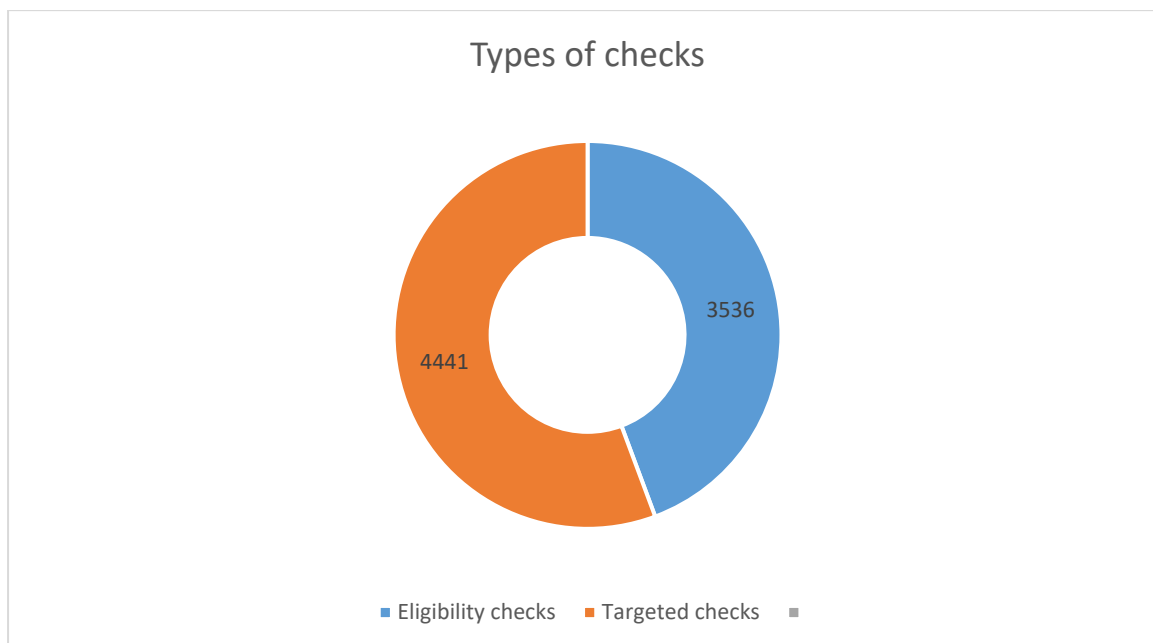
By registering, interest representatives agree to provide complete, up-to-date, accurate and not misleading information when they register. They remain ultimately responsible for the accuracy of their registration data. Registrants should review and update the information provided as soon as any major changes occur and must update their registration at least once a year in order to remain listed. They are prompted to update it at least twice a year.

One of the main tasks of the Secretariat is to remind registrants of their obligations and ensure the data in the Transparency register is of the highest quality. In 2024, as part of its general monitoring activities, the Secretariat checked a total of 7 977 entities<sup>30</sup> that either applied for registration or were already entered in the register. This represents a 3.5% increase over the number of checks performed the previous year.



These checks consisted of screenings carried out at the application stage, targeted quality checks on the data provided by already registered entities and any additional checks carried out as part of investigation procedures.

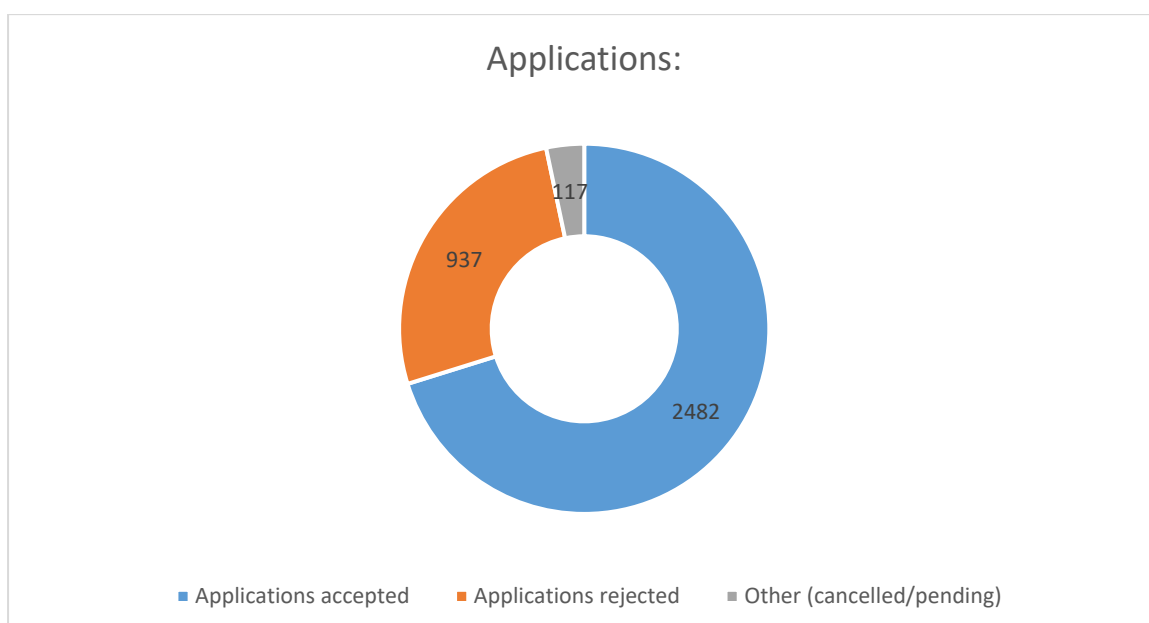
<sup>30</sup> Some entities underwent more than one check in 2024 and therefore the total number of checks was higher.



### Application stage

The total number of registrants slightly increased in 2024<sup>31</sup>. However, due to the high turnover of new registrants, the quality of the information available in the register has also improved. The Secretariat assesses the eligibility and data quality of all new applications for registration before they can be activated and published on the register. This improves both the relevance and consistency of the data provided. In 2024, 3 536 applications were received (almost 10 a day), a 4% increase over the previous year and confirming the upward trend from 2023.

Of these, 2 482 (70%) were accepted and activated following the initial checking process to establish applicants' eligibility, which in most cases requires updates or corrections by the applicants.

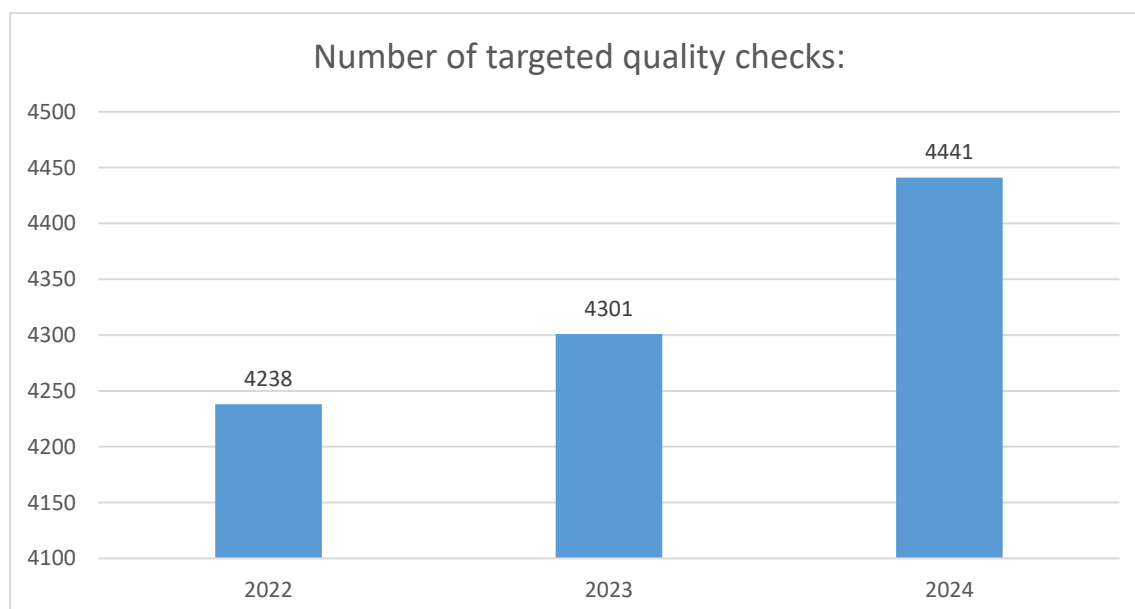


<sup>31</sup> 12 425 on 31 December 2023 and 13 118 on 31 December 2024.

## Targeted checks

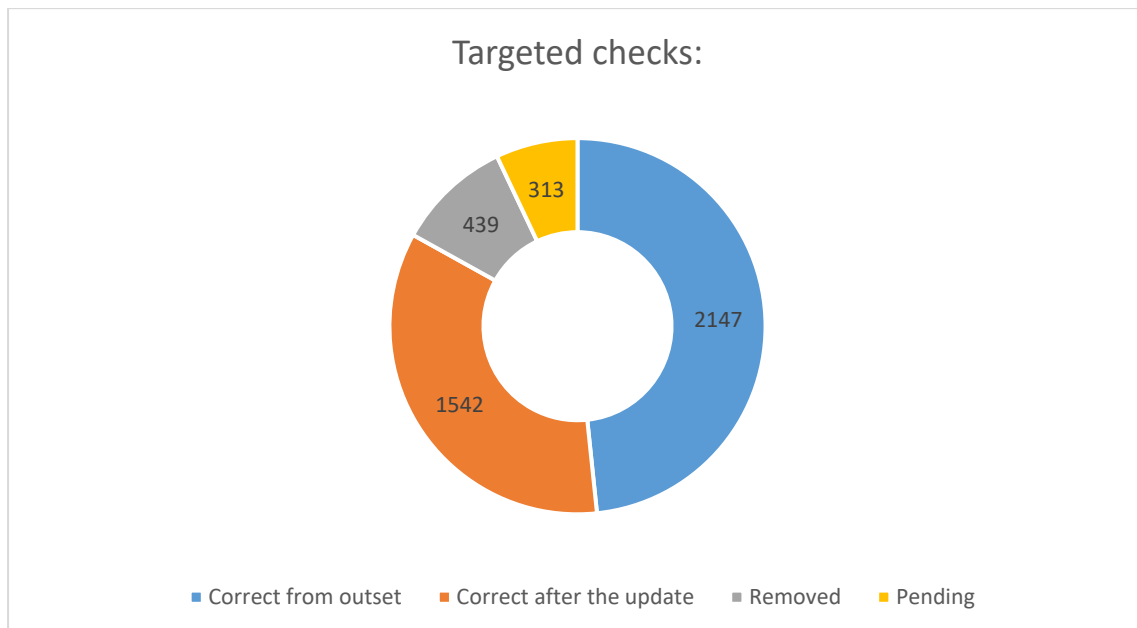
Besides a daily review of new applications, the Secretariat also adopts a targeted approach, especially where it has reason to believe that registrations do not provide the required information accurately, or according to its set annual priorities.

A total of 4 441 targeted quality checks on existing registrations were performed by the Secretariat in 2024.



Of these:

- 3 689 checked registrants provided satisfactory data quality (83%), either from the outset (2 147 registrations checked, or 48%), or after being prompted by the Secretariat to update (1 542 registrations, or 34%);
- 439 were removed from the register following the contact with the Secretariat, for ineligibility or failure to update (10%);
- 313 were still pending at the end of 2024 (7%).



In 2024, the trend towards improved overall data quality continued, with both of the following metrics remaining stable, compared to the previous year: the share of registrations providing satisfactory data quality at the time of the check; and the share of removals from the register due to ineligibility or failure to update.

The year-on-year change for both metrics has flattened considerably (to less than 1%) after years of significant improvement. This could be due to the register reaching maturity and its population becoming increasingly used to the information requirements and their generally positive reaction to the Secretariat's monitoring and guidance.

Targeted checks require a particular focus on registrations where inconsistencies or other issues have been detected or are likely to exist. As part of its annual priority for tailored monitoring of the register, the Secretariat performed targeted quality checks on all registrants advancing the interests of their clients (intermediaries) and all non-commercial entities who could act as vectors of foreign influence on EU policy-making (i.e. those based outside the EU).

The intermediaries were given particular focus to ensure they were fully aware of the requirement to list all the clients for whom they carry out the activities covered, including in particular any third country (non-EU) public authorities<sup>32</sup>. Intermediaries should also ensure that their clients are invariably registered in the Transparency register (except where these are governments/public authorities) and that their clients also consistently include them as their intermediary in their own registrations<sup>33</sup>.

The Secretariat thoroughly checked these registrations, cross-checking with the client declarations, and contacted each registrant concerned. That exercise was important both in terms of data quality and awareness-raising. Its results also showed that, although the Transparency register features some information on third country interest representation and

<sup>32</sup> See point (d) of Article 4(2) of the IIA.

<sup>33</sup> Under point (j) of the code of conduct set out in Annex I to the IIA.

influence, in line with the applicable provisions of the IIA<sup>34</sup>, the register is not an appropriate tool for tracking and measuring foreign influence or capturing foreign interference.

## 2. Helpdesk service

The Secretariat offers a helpdesk service to answer all types of questions about the Transparency register through a multilingual website, accessible to applicants, registrants and the public. The Secretariat aims to provide assistance as quickly as possible, generally trying to answer within 48 hours.

In 2024, the Secretariat answered 1 834 inquiries, which included requests for information about the Transparency register from stakeholders, researchers and individuals, as well as requests for technical support and guidance from applicants and registrants during the registration process or when encountering technical difficulties.

The number of questions received significantly decreased in 2024, which is the result of upgrading the Transparency register IT system in April 2024, making it considerably more user-friendly<sup>35</sup>.

## 3. Investigations

In addition to monitoring the quality of data in the Transparency register, the Secretariat handles incoming complaints and carries out own-initiative investigations in line with the procedures laid down in Annex III to the IIA. In doing so, it acts in accordance with the underlying principles of proportionality and good administration.

‘Complaint’ refers to a procedure that concerns allegations brought to the attention of the Secretariat about a registrant’s non-observance of the code of conduct. Any natural or legal person making such allegations against a registrant can lodge a complaint with the Secretariat by filling in the relevant complaint form on the Transparency register website and providing supporting evidence.

‘Own-initiative investigation’ refers to a procedure whereby the Secretariat examines whether a given registrant is eligible to remain on the register in the light of information received or identified, either due to absence of relevant activities or non-observance of the code of conduct.

In 2024, the Secretariat closed 3 investigations into complaints pending from the previous year, one of which was inadmissible. The 2 other complaints concerned the consistent inclusion of communication activities and membership of think tanks into lobbying costs for the registrants. Both registrants concerned provided satisfactory information and updated their registration according to recommendations made by the Secretariat.

In the same year, the Secretariat received 23 new complaints. Of these, 9 were found to be inadmissible, either because they did not relate to matters covered by the Transparency register (e.g. misaddressed personal grievances or consumer-related complaints) or because they did not meet the admissibility criteria set out in Annex III to the IIA.

---

<sup>34</sup> Point d) of Article 4(2) of the IIA

<sup>35</sup> In 2023, the Secretariat answered 2 567 inquiries and requests.

Three complaints were submitted in December 2024, and for two of these cases, admissibility had not been decided by the end of the year. Of the remaining 12 admissible complaints, 3 were closed in 2024 with a positive outcome, with the full cooperation of the registrants concerned.

The remaining 9 were still under investigation at the end of the year. All of the admissible complaints concerned at least alleged non-observance of point (f) of the code of conduct by the registrants concerned, in terms of accuracy and completeness of the information provided in the registration, often combined with allegations of possible non-observance of other points of the code. Where cases concerned only point (f) of the code, those were resolved by the registrants updating the information within the deadline of 20 working days, and they were closed within two months.

Other cases concerned alleged non-observance of point (b) of the code, whereby registrants must specify the clients or members they represent. One in-depth investigation explored the extent to which organisations, platforms and other representative bodies needed to declare all members represented (i.e. those members represented at EU level only or all members in general) and in what form (i.e. in the registration via a link to their own website).

The guidelines for applicants and registrants were updated in 2024, to clarify that all members, no matter the context, must be declared. With regard to point (j) regarding the client-intermediary relationship, in terms of public expectations there is clearly a concern about the underlying interests promoted by any given organisation, which must be clearly and consistently declared in the registration.

To that effect, as part of its monitoring activities in 2024, the Secretariat sought to raise awareness that in a client-intermediary relationship, both parties in such a relationship must be entered in the register and the corresponding declarations must be consistent.

When handling an investigation, the Secretariat always seeks to ensure a constructive dialogue with the relevant registrant(s), to clarify and resolve the identified issues as far as possible, before taking any necessary measures. In that context, the Secretariat held 4 meetings with 3 registrants concerned by investigations, at their request, under point 5.2 of Annex III to the IIA. In 2024, the Secretariat did not find it necessary to apply measures under point 8 of Annex III to the IIA against a registrant.

The Secretariat opened 1 own-initiative investigation targeting 2 registrants active in the food industry, which was closed by the end of the year. The Secretariat looked into possible inappropriate behaviour allegedly taking place as part of those registrants' activities and, following the investigation, was able to clarify with the parties concerned that the code of conduct had been observed.

#### 4. 2024 Management Board meeting

The Secretariat prepared the 4th meeting of the Management Board, which took place on 19 April 2024. At that meeting, the Management Board took the following decisions:

- Renewed the term of the head of the unit responsible for transparency issues at the General Secretariat of the Council as 'Coordinator of the Secretariat' for one year (1 January until 31 December 2025);
- Adopted guidelines on the implementation of Article 11 of the IIA, as prepared by the Secretariat, and asked to publish them on the Transparency register website;

- adopted the annual report for 2023, agreed to submit it to the signatory institutions and publish it on the Transparency register website;
- determined the annual priorities for the register in 2025, together with the budget estimates and share for each signatory institution<sup>36</sup>;
- welcomed the progress and achievements made, especially the launch of the new website and supporting IT tool, in the register's first major overhaul since its launch more than a decade ago;
- stressed the importance of continuing the data quality exercise, after the completion in early 2024 of a full monitoring cycle of 'legacy' registrations that had been transitioned after the entry into force of the IIA;
- took note of the increased expectations placed on the Transparency register as a key transparency tool of the EU institutions and the recommendations and suggestions made by the European Court of Auditors and the European Ombudsman, in the steps to improve the register and its operation further.

All documents relating to the meeting of the Management Board, including the agenda and minutes of the meeting, are published on the Governance section of the Transparency Register website.

## 5. Guidance and awareness raising

The Secretariat issues guidance to clarify and explain in more detail certain requirements in the IIA. This guidance can be the fruit of regular exchanges with stakeholders and aims to help applicants and registrants provide accurate information and avoid common mistakes.

In that context the Secretariat updated its guidelines for applicants and registrants with additional guidance on information about membership and affiliation, as a follow-up to the relevant exchanges held with the European Ombudsman (see under (8) below).

In addition, in line with its set annual priorities, the Secretariat issued detailed guidelines on implementing Article 11 of the IIA to facilitate other EU institutions and bodies' adoption of measures linked to the register.

During its monitoring activities, the Secretariat may also invite entities to register in the Transparency register, where relevant. The Secretariat undertakes regular communication and awareness-raising activities to promote the tool among stakeholders. In 2024 this included information sessions and exchanges held with various stakeholders<sup>37</sup> and university researchers/students, as well as contacts and best practice sharing with similar bodies at national or European level<sup>38</sup>.

---

<sup>36</sup> For 2025 the budget estimates can be found on this website. The following shares were agreed: Commission: 57%; Parliament: 33%; Council: 10%.

<sup>37</sup> LobbyControl/ Corporate Europe Observatory.

<sup>38</sup> Dutch Permanent Representation to the EU, OECD, European Chemicals Agency, European Lobbying Registrars' Network (ELRN), KU Leuven, MEPP Leuven, American University EPPAI, Stirling University, Maastricht University, Escuela de Gobierno y Asuntos Públicos; Lusófona University, Erasmus University Rotterdam, Politico Public Affairs Executive Programme, Council of Europe Parliamentary Assembly (Committee on Legal Affairs and Human Rights).



The three institutions provided considerable awareness-raising activities about the Transparency register within each institution, through dedicated information and training sessions for Members and staff<sup>39</sup>.

## 6. Technical developments

The Secretariat coordinates the development of IT solutions to improve the Transparency register. In 2024 the Secretariat aimed at further increasing the transparency and usefulness of the register's public website. To that end, it launched a new Transparency register website (the first major overhaul of the register since its beginnings more than a decade ago).

The Secretariat launched the new Transparency register digital platform to adapt to contemporary technological and information security standards and improve the user experience. The new IT tool has replaced the register's existing technological infrastructure and includes a new version of the Transparency register public website, as well as new back-office environments. The new version of the Transparency register has been live since April 2024.

## 7. ECA audit on the Transparency register

The ECA issued its special audit report on the Transparency register in April 2024 making certain recommendations and setting a target implementation date for July or end of 2025. The 3 auditee institutions making up the Transparency register provided their official replies to the audit report. Both the special audit report and the replies from the institutions were made public on the ECA website<sup>40</sup>.

## 8. European Ombudsman decision in case 532/2023/FA

In early 2024, the Ombudsman adopted a decision finding maladministration and making suggestions on how the Secretariat could improve the way it carries out investigations into complaints<sup>41</sup>.

The 3 institutions making up the Secretariat provided their formal replies addressing these suggestions in September 2024. In particular, the Secretariat revised its guidelines for applicants and registrants as regards the information to be provided under heading 12 ('Membership and affiliation') and the corresponding heading in the application/ registration form, with a view to reflecting more accurately the structure of the relevant information points set out in Annex II to the IIA<sup>42</sup> and facilitating a clearer understanding of the information required from applicants and registrants under those points.

---

<sup>39</sup> This includes 64 information sessions on interest representation for MEPs, staff and accredited assistants in the European Parliament. The Commission also provided ten such training sessions for its own staff, as well as tailored presentations to Commissioners' cabinets and their network of transparency and ethics contact points. In the Council, a series of communication and awareness-raising activities were undertaken to explain the IIA and the practical implementation of Council Decision (EU) 2021/929, in particular for managers.

<sup>40</sup> [Special report 05/2024: EU Transparency Register | European Court of Auditors](#)

<sup>41</sup> <https://www.ombudsman.europa.eu/en/opening-summary/en/168956>

<sup>42</sup> Points (h) and (i) of Part I of Annex II to the IIA.

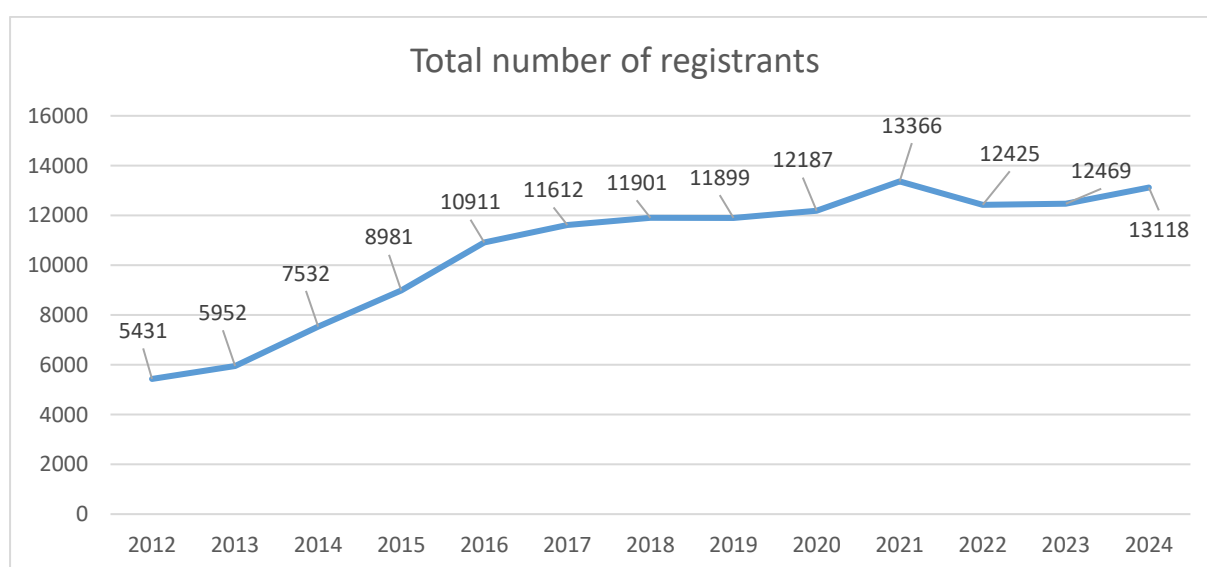
The Ombudsman closed the case by welcoming the concrete actions taken by the Secretariat to ensure the effective implementation of her suggestions.

## VI. Statistics

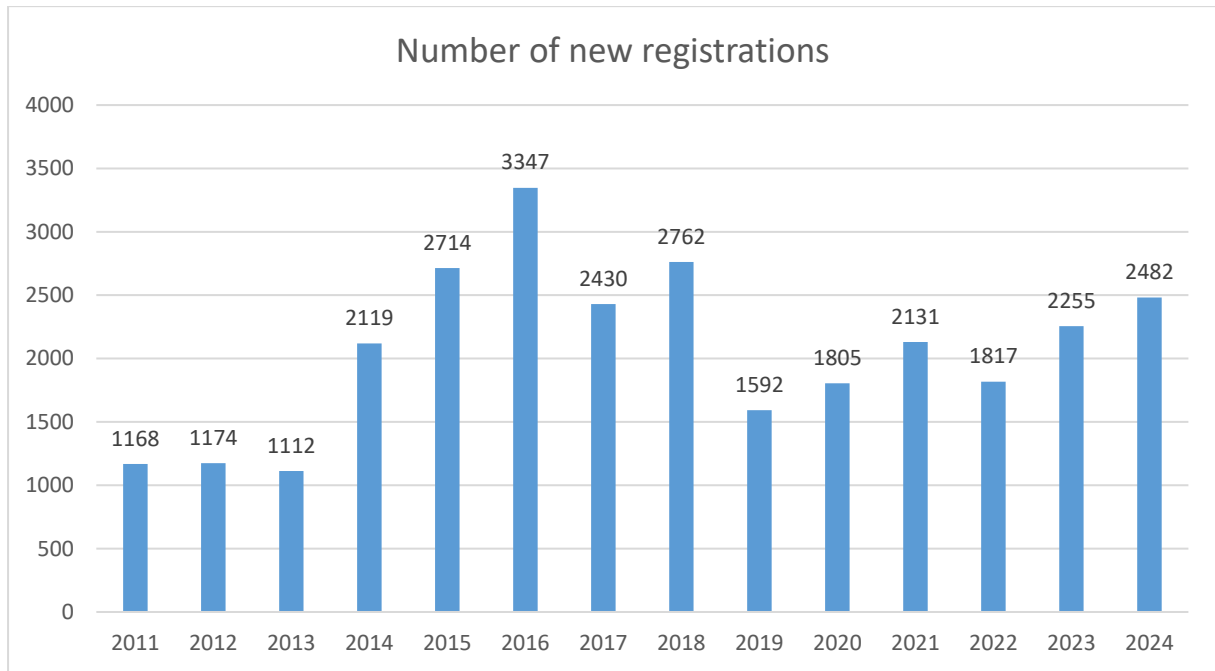
### 1. Development of the Transparency register

The Transparency register has grown steadily from its inception as a joint public database of the European Parliament and the Commission to the current tripartite scheme established by the IIA.

In 2024 the total number of registrants increased, compared to 2023. There were 13 118 registered interest representatives at the end of 2024.

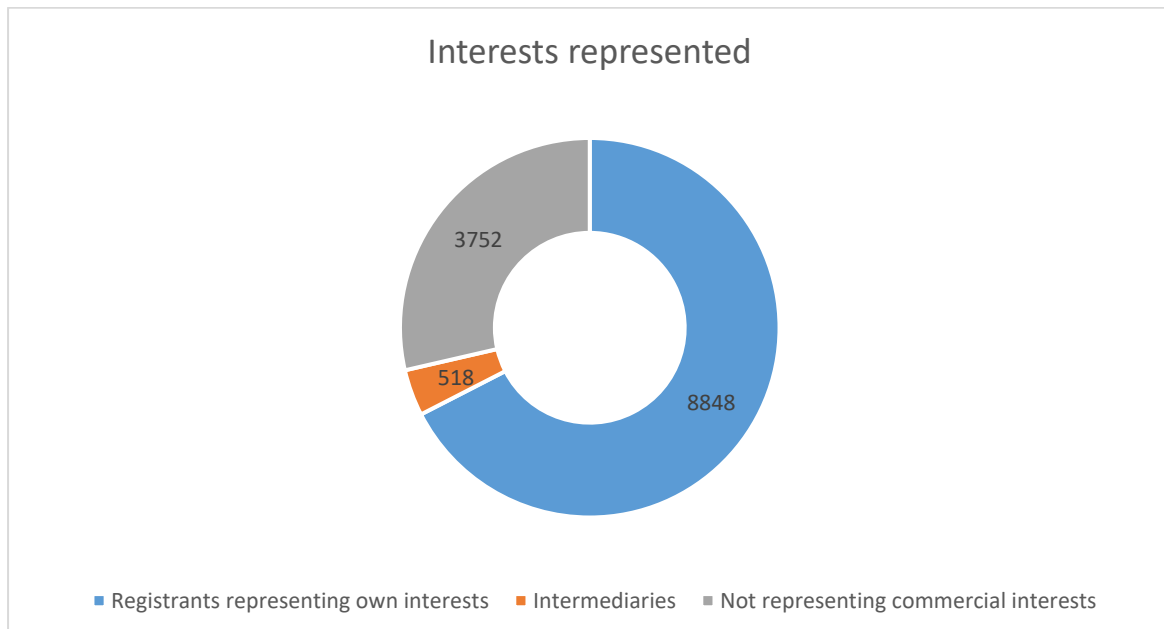


The chart below shows the changes in numbers of new registrations, covering interest representatives registered over a 12-month period (1 January to 31 December 2024) and still active at the end of that period. The number of new registrations in 2024 (2 482) is higher than in the previous years. The Secretariat received 3 536 applications (almost 10 a day), meaning that only 70% of those were accepted and activated following the Secretariat's screening.



## 2. Interests represented

Under the IIA, registrants are sorted into three main types of interests represented, with different corresponding bands of financial information applicable to each category.

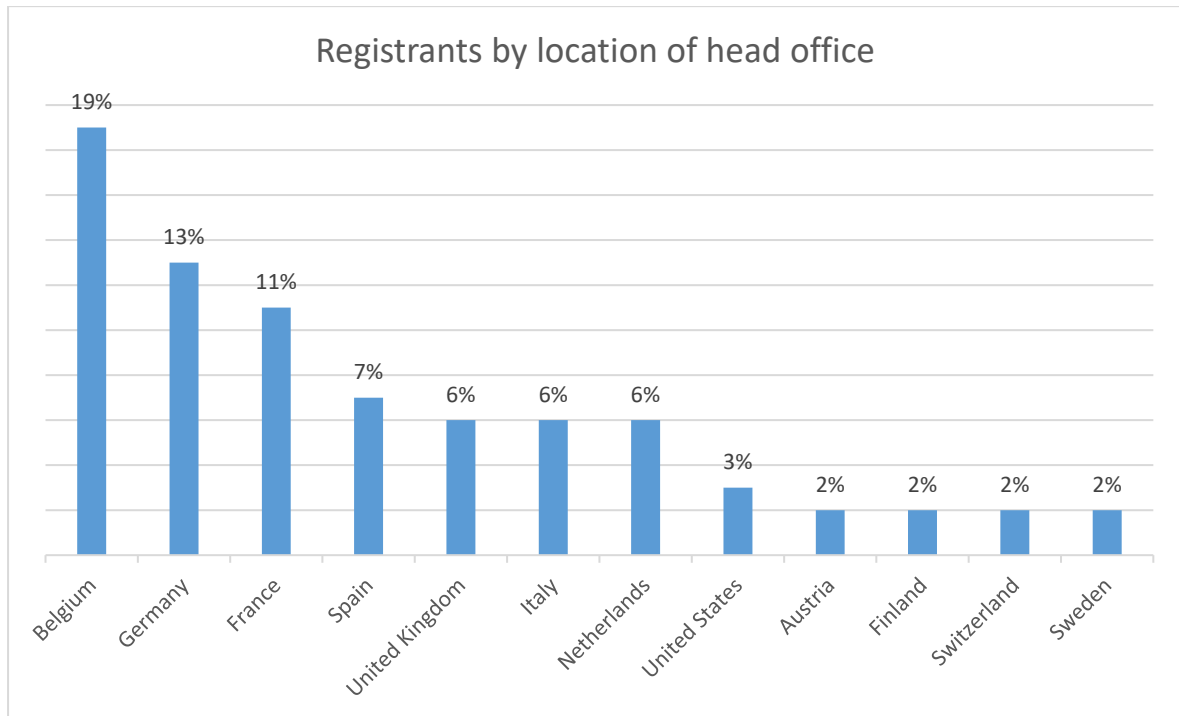


Registrants selected the following sections:

Professional consultancies	518
Law firms	73
Self-employed consultants	128
Companies and groups	3 488
Trade and business associations	2 636
Trade unions and professional associations	992
Non-governmental organisations, platforms and networks and similar	3 607
Think tanks and research institutions	583
Academic institutions	336
Organisations representing churches and religious communities	48
Associations and networks of public authorities	181
Entities, offices or networks established by third countries	4
Other organisations, public or mixed entities	524

### 3. Geographical data

The Transparency register is not limited to interest representatives established in the EU, although the largest group operates from establishments in Belgium. However, since the scope of EU legislation and policy also affects individuals and businesses outside the EU, impacting trade and other external relations beyond the 27 Member States, this global reach is reflected in the Transparency register.



#### 4. Transparency register data views

In 2024, the register's consolidated dataset on the [European data portal](#) was the 7th most viewed among over 1 800 000 datasets published there. These datasets allow users to download (in xml or Excel format) the list of individuals accredited for access to the European Parliament premises and the list of entities featuring on the Transparency register, with data going back several years.

## VII. Conclusions

In 2024, the Transparency register continued to be the reference tool for following interest representation activities carried out at EU level. This was particularly significant as it occurred under intense scrutiny, due to the 2024 European elections, highlighting the critical role of transparency at this pivotal time.

The total number of registrants marked an increase during the period, compared to 2023. The number of new registrations was higher than in previous years. The Secretariat received a significant number of applications, 70% of which were accepted and activated following screening by the Secretariat.

Throughout the year, the Secretariat aimed to improve the transparency and usefulness of the register's public website. It launched a new digital platform to meet modern technological and security standards and improve user experience. This overhaul included a new public website and back-office environments, which have been live since early 2024.

It was also a busy year in terms of the Secretariat's core activities, including the issuance of additional guidance, helpdesk assistance and awareness-raising, data quality monitoring and investigations.

The upward trend in the number of new applications evidenced in last year's data continued in 2024. The trend from last year regarding improved overall quality of data in the Transparency register remained stable, as the Secretariat continues to engage in regular monitoring exercises.