



## Secretariat of the Transparency Register

### MAPPING OF THE IMPLEMENTATION OF THE 2021 INTERINSTITUTIONAL AGREEMENT ON THE TRANSPARENCY REGISTER

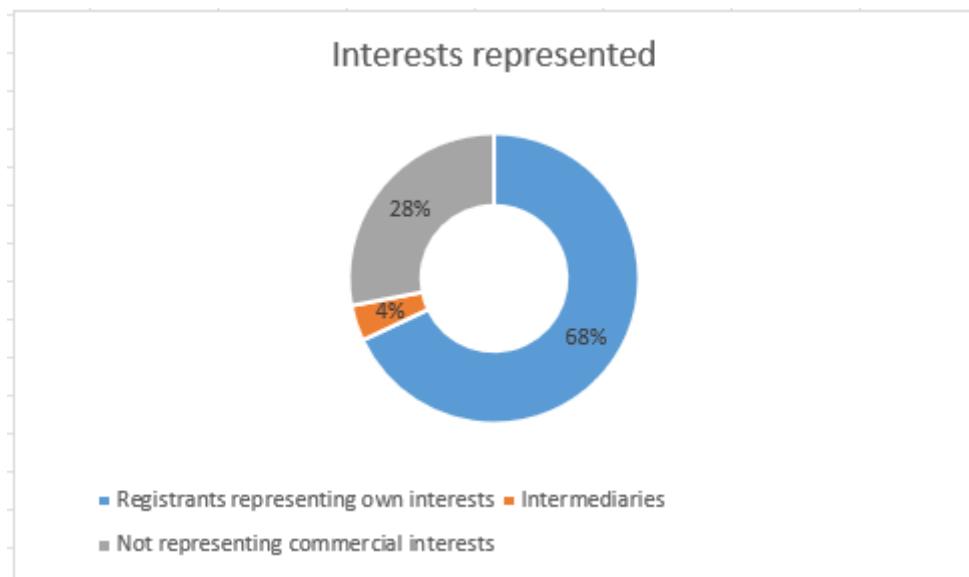
#### 1) INTRODUCTION

The **Transparency Register** is established by the **Interinstitutional Agreement of 20 May 2021 (IIA)**<sup>1</sup> and is a key tool for lobbying transparency in the EU. First set up in 2011, it is since 2021 a common tool of the European Parliament, the Council and the Commission (the signatory institutions of the IIA), strengthening a common transparency culture across the EU institutions. It has also become a benchmark for national lobbying rules and registers.

Four years after the IIA, the register is reaching peak registration levels. It counts more than **14 000 registrants**, that are categorised into **three main categories of interest representation** as follows:

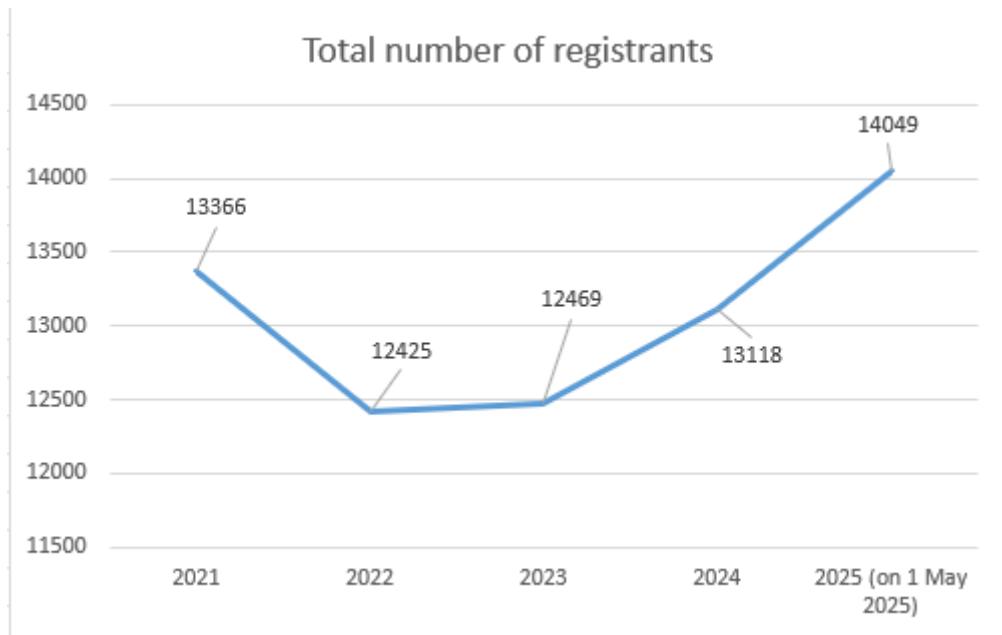
- registrants promoting their own interests or the collective interests of their members, typically including companies and groups, professional or employers' associations, trade unions and business associations that represent members or a particular industry or business sector, make up the largest proportion of **68%**;
- intermediaries advancing the interests of their clients, referring to professional consultancies and law firms, represent approximately **4%**;
- registrants that do not represent commercial interests, typically referring to civil society and non-governmental organisations, foundations, academic and research institutions and think tanks, make up an approximate **28%**.

<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, 11.5.2021, p.1](#)).



The IIA made observance of the code of conduct for registrants an integral part of eligibility to be registered, requiring applicants to give their explicit commitment to respect ethical and behavioural principles in their interest representation contacts with the EU institutions (**Annex I** to the IIA). This observance is subsequently monitored. For the same reason, the IIA strengthened and increased information requirements for registrants, including tailored financial disclosures for each of the above categories (**Annex II** to the IIA), while maintaining that registrants must provide a full update at least once a year. To increase data quality in the register, the IIA established a screening procedure from the application stage, requiring all new applications to be checked for eligibility of the applicant and satisfactory data quality prior to their activation in the register. The IIA also sets out clear procedures for monitoring and investigations, as well as the measures to be taken in the event of a finding of a registrant's non-observance of the code of conduct (**Annex III** to the IIA).

After the initial transition phase in 2021 and 2022 upon entry into force of the IIA, in 2023 and 2024 the register has reached a certain level of maturity and stability. This applies to applicants and registrants, as well as to the Secretariat's operations.



The IIA is due for a **review** by 2 July 2025 in accordance with Article 14 thereof.

To fulfil the annual priorities of the Transparency Register in 2025, the Secretariat carried out the requested mapping exercise based on its acquired experience in performing its assigned tasks regarding the operation of the Transparency Register under the IIA, and including relevant stakeholder input it has received. It is submitted to the Management Board for its consideration.

## 2) IMPLEMENTATION OF THE IIA

### • The initial phase (2021-2022)

The IIA entered into force on 1 July 2021. On 20 September 2021, the Secretariat published a new application/registration form on the Transparency Register website to enable applicants and registrants to satisfy the new information requirements set out in the IIA.

During a first transitional period, the priorities for the Transparency Register focused on the implementation of the new framework. Among other actions, the Secretariat issued new guidance to applicants and registrants and managed a **complex transition** affecting more than 11 000 registrants, who were required to amend their registrations to satisfy the information requirements resulting from the IIA (with 87% thereof complying timely with that requirement and **1 496 registrants removed**). This exercise provided for a considerable clean-up of any inactive elements of the register and led to an overall drop in the number of registrants.

The year 2022 was the first year of full implementation of the new Transparency Register in operational terms. The Secretariat carried out a detailed assessment of the performance of the register's IT platform, setting up an ad hoc IT Working Group consisting of the relevant IT services of the three institutions. The resulting recommendation was to replace the existing Transparency Register infrastructure with a new state-of -the-art digital platform to adapt to contemporary technological and information security standards and enhance user experience. The assessment of the business needs started at the end of that year.

- **A mature register (2023 & 2024)**

The year 2023 was a year of intense scrutiny for the Transparency Register and implementation reached a mature stage by the end of the year. The use of the register as an information and reference tool for interest representation activities at EU level increased, with both a rise in applications and increase in helpdesk assistance and information requests by the public. In parallel, based on the annual priorities set by the Management Board, the Secretariat increased its monitoring levels of the registrants' data and their compliance with the code of conduct.

Following the transition period for the new register, in 2023, the Secretariat increased its targeted monitoring on registrants to one-third of the overall number of registrants (7 705 entities that either applied for registration or were already entered in the register), representing a 13% increase on the number of checks performed the previous year. In 2024, the Secretariat maintained these high levels of monitoring (checking a total number of 7 977 entities that either applied for registration or were already entered in the register), with a 3,5% increase on the already high number of checks performed the previous year. The annual priorities for the Secretariat regularly include improving data quality and dedicated monitoring exercises. In particular, the annual priorities for 2025 include the checking of registrations at regular intervals: each registrant is to be checked once every three years following initial validation. Since 2023, registrations that are temporarily suspended are visible in a dedicated list appearing on the website homepage.

In addition, mindful of the growing interest on the subject of foreign influence, the Transparency Register's annual priorities in 2024 included tailored screenings of the content of the register to increase the visibility of third country lobbying. The Secretariat checked intermediaries or non-commercial registrants who may act as vectors of foreign influence on EU policy-making, based on the information available to it. The result of this exercise showed that although the Transparency Register features some information on third country interest representation and influence, the register is not an appropriate tool to measure all forms of foreign influence or to capture foreign interference.

In 2024 the Management Board adopted the guidance prepared by the Secretariat regarding the voluntary involvement of other EU bodies under Article 11 of the IIA and setting out a specific procedure as a basis for facilitating synergies with other Union actors.

In April 2024, the new Transparency Register website was launched. It is designed to provide a more secure and user-friendly environment for applicants and registrants and other users of the systems (such as complainants). The new IT application allows a ‘restricted space’ for each and every user of the system which is secured by EU Login and two-factor authentication access. In that restricted space, the user can access, as applicable, its application, registration, exchanges with the Secretariat on data quality checks, queries to the Secretariat, complaints and formal decisions of the Secretariat in the context of investigations.

- **Recent developments (January – April 2025)**

In January 2025 the Secretariat implemented a new feature in the Transparency Register which allows registrants to re-activate their former registration on the register and maintain the same registration number. That feature is aimed at retaining historical memory of registrations on the Transparency Register, including information on meetings with EU decision-makers, whilst facilitating, at the same time, registrants’ re-enrolling process<sup>2</sup>.

Further functionalities are also envisaged for 2025, including automatic collection of statistical data, automatic translation of queries, cross check of the information provided by intermediaries and clients and a dashboard to aid the work of case handlers.

- **Evolution of complaints handling mechanism and administrative investigations**

The Secretariat processes complaints with a view to establishing a registrant’s continued eligibility and observance of the code of conduct annexed to the IIA. It handles complaints and carries out investigations according to the procedures set out in Annex III to the IIA.

In line with the lessons learned and its experience in handling complaints since the entry into force of the new IIA, the Secretariat has extensively reflected on how to refine its working methods for handling complaints and carrying out investigations, to enhance procedural consistency.

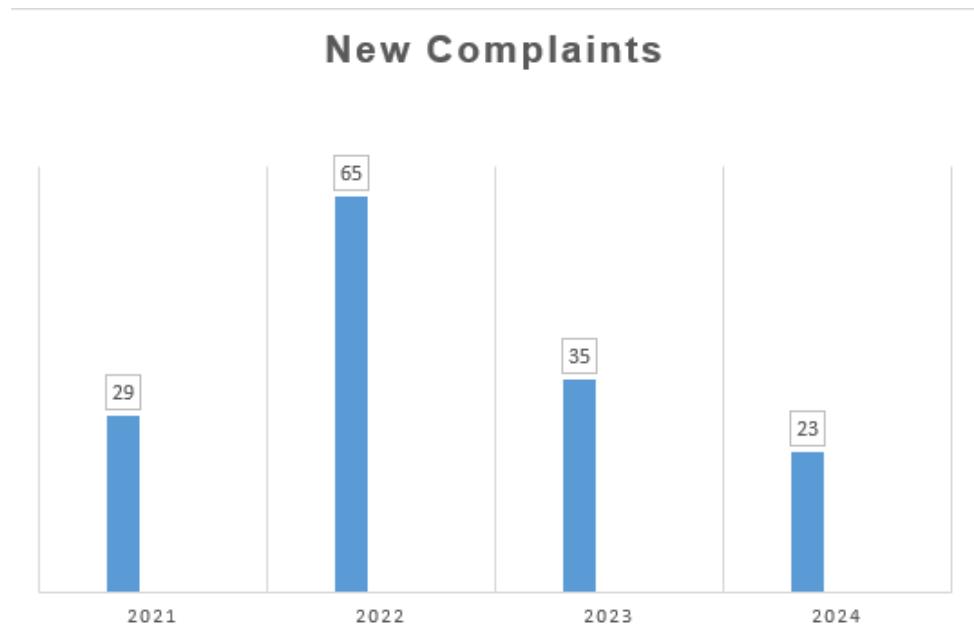
To enhance the thoroughness of investigations, the Secretariat has expanded the range of sources and information it examines. Alongside evidence submitted by complainants, it actively reviews publicly available documents, databases, and materials, and may request supporting evidence from registrants. Additionally, to improve the quality of the information gathered, the Secretariat has welcomed an increase in hearings with registrants under investigation. The Secretariat also informs complainants more thoroughly regarding complaints’ admissibility or lack thereof.

Own investigations is another tool that the Secretariat has been actively using under the IIA, with the Secretariat availing itself of the relevant provisions to investigate several sensitive cases.

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<sup>2</sup> This feature addresses a technical recommendation made by the ECA (see section (4) below)

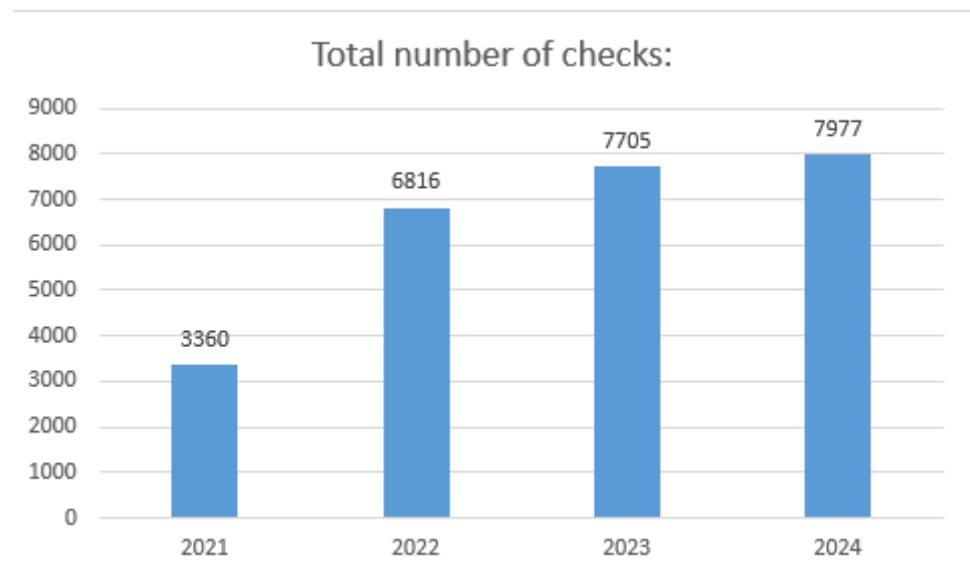
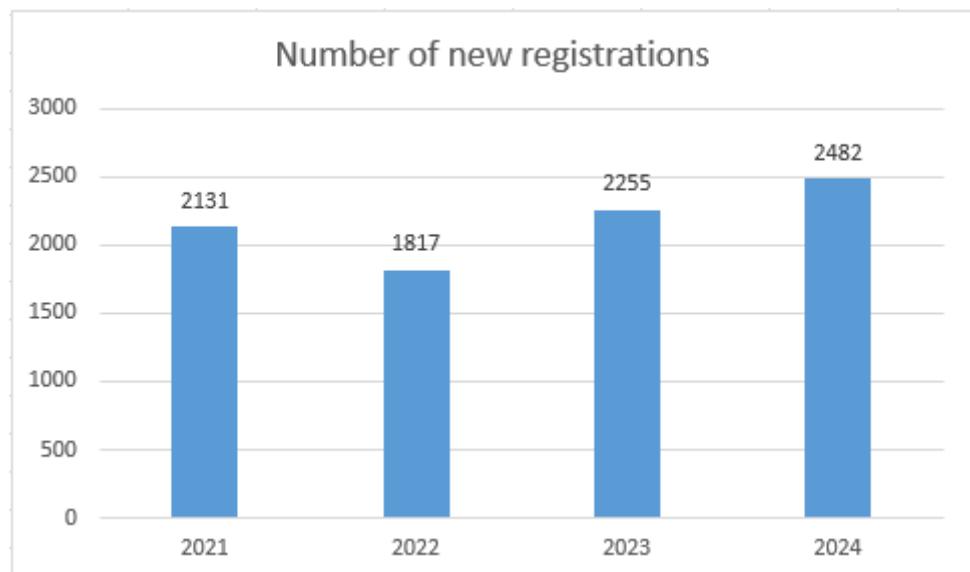
Certain new IT-developments enabled the Secretariat to keep more consolidated record of complaints and own initiative investigations, therefore improving its audit trail and information management.



- **Overall achievements under the IIA**

Since 2021, the IIA has provided **new impetus and direction**, leading to the following significant achievements:

- continued high registration levels, due to relevance of registration (notably through the application of implementing measures in the institutions);
- improved quality of data with focused monitoring on content prior to publication and targeted checks after;
- within the framework of the administrative procedures laid down in the IIA, meaningful and in-depth investigations with positive cooperation rates and added value on outcome;
- coordinated approach and enhanced cooperation between the EU institutions on their transparency policy and relations with interest representatives.



### **3) THE IMPLEMENTING MEASURES IN THE SIGNATORY INSTITUTIONS**

The signatory institutions' commitment to promoting transparent and ethical lobbying has seen each adopt internal rules to make certain activities conditional upon prior registration of interest representatives. They have also continued to implement complementary transparency measures. This gives effect to the mandatory element of the IIA and concerns various types of regular direct contacts between interest representatives and decision-makers.

Since the adoption of the IIA, the signatory institutions have developed, reinforced and clarified further their conditionality and complementary transparency measures, thus adding strength to the mandatory element of the register. As a result, conditionality measures cover a wide array of interest representation activities directed at the EU institutions, including measures

concerning meetings with representatives or staff of the signatory institutions, participation in events or briefing sessions, membership of expert groups and access to the institutions' premises. Those measures have brought about further transparency of the signatory institutions' interactions and contacts with interest representatives and have also resulted in greater awareness among interest representatives of both the need to register in the Transparency Register in order to be able to pursue activities at EU level and the requirement to provide accurate and complete information when registering and on a going forward basis. Detailed information about these measures and their evolution can be found in the 2023 and 2024 [annual reports on the functioning of the Transparency Register](#).

#### **4) THE IMPLEMENTING MEASURES IN EU BODIES, AS WELL AS IN MEMBER STATES**

In addition, in 2023 and 2024, the Secretariat cooperated with EU bodies on their exploration of onboarding the Transparency Register framework. The [European Economic and Social Committee and the European Committee of the Regions adopted measures of their voluntary involvement in the Transparency Register framework](#), in line with Article 11 of the IIA, with other EU institutions having expressed a similar interest following suit. The list of conditionality and complementary transparency measures has also enlarged in 2024 with [Belgium notifying measures concerning its permanent representation to the EU](#) in accordance with Article 12 of the IIA.

#### **5) EXTERNAL SCRUTINY AND PUBLIC EXPECTATIONS**

As the Transparency Register has grown in importance, so has the scrutiny of the database itself and its uses, both by the public and EU oversight institutions. During the years 2022-2024, the register underwent an in-depth audit by the European Court of Auditors (ECA) and was also the subject of an investigation by the European Ombudsman in 2023. Both exercises pinpointed possible areas for improvement for the register as a public transparency tool.

In its **special audit report on the Transparency Register**<sup>3</sup>, the ECA made certain recommendations, calling for improved data quality and user-friendliness of the Transparency Register, on the one hand, and suggesting ways in which the institutions could align their respective lobbying rules. The IIA signatory institutions provided their formal replies to such recommendations (see [here](#)).

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<sup>3</sup> [Special report 05/2024: EU Transparency Register | European Court of Auditors \(europa.eu\)](#)

The **European Ombudsman carried out an inquiry** into how the Secretariat carried out two connected investigations in 2022, which was concluded in 2024 with a finding of maladministration. In closing the case, the European Ombudsman made some suggestions to improve the way future investigations are to be carried out. The Secretariat has taken steps to address the Ombudsman's recommendations and informed it thereof<sup>4</sup>. Some of these steps are outlined in section 2 above.

Moreover, the Secretariat regularly **engages with stakeholders** with a view to responding to common or frequent questions, and also updates its guidelines and FAQs to foster compliance and better understanding of the register. Such engagements also provide the Secretariat with an opportunity to gather feedback from stakeholders on their expectations or difficulties faced.

Other stakeholders submit proactively such feedback or issue relevant open letters or policy papers as part of their activity. Indicatively, civil society organisations active on transparency at EU level have expressed the view that proper implementation of the existing framework and ensuring excellent quality of data in the Transparency Register are of crucial importance. Some contributions have also called for a stronger Transparency Register commanding sufficient resources or criticised the legally non-binding nature of the IIA on registrants.

## 6) REMAINING CHALLENGES

Four years after the IIA's entry into force, the Secretariat has acquired experience in performing its assigned tasks. In this context it has identified certain challenges in the context of the operation of the framework of the current IIA, which can be summarised as follows:

- ***Ensuring excellent data quality***

Ensuring the accuracy and quality of information in the Transparency Register is a constant challenge for a dynamic tool that is predominantly voluntary on interest representatives and relies on the latter's declarations of assurance as regards the information that they provide. Moreover, applications to the register have also continued to increase since the entry into force of the new IIA and the Secretariat has a target of checking the register's full population every three years following initial validation. A further systematisation of checks of the register's content supported by IT tools under constant improvement would facilitate improving overall data quality. Factoring in further **digitalisation** and **artificial intelligence** in that process would be essential to enable the register to rise up to the technological challenges and remain fit-for-purpose.

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<sup>4</sup> [Case 532/2023/FA](#)

- ***Codification of the register's working methods and procedures***

The IIA sets out the rules and procedures governing the Secretariat's decision-making and administrative tasks. Based on the experience gathered in the application of the IIA procedures and given the daily cooperation and common decision-making of three institutions in the Secretariat, the carrying out of such tasks could benefit from a codification of existing working methods and practices to serve as the Secretariat's formal **rules of procedure**. That would allow to further streamline the Secretariat's processes in carrying out administrative investigations and other handling procedures to ensure an even more efficient functioning of the Transparency Register and further consolidate record-keeping.

- ***Further strengthening the coordinated approach established by the IIA***

The IIA has established a framework and operating principles for a coordinated approach of the EU institutions as regards transparent and ethical interest representation. Increased coordination between the institutions can help ensure a consistent and uniform implementation of the rules and principles of the IIA. The enhanced onboarding of other EU institutions and bodies could further reinforce the coordinated approach of the joint framework and citizens' perception of the Transparency Register as a truly common tool at EU level.

## 7) NEXT STEPS

Given the state of implementation of the IIA, the achievements made so far, and the challenges identified above, the following measures in the remit of the Secretariat and the Management Board under the current framework could be undertaken:

- **Strengthening further the technical capabilities of the Transparency Register:** Technical improvements could contribute to better compliance from registrants and help the Secretariat to refine and further optimise its monitoring efforts. Upgrades such as enhanced data display, more advanced search tools, AI functionalities and mechanisms to detect links between registrations can contribute to further improving data quality in the register.
- **Consolidating the Secretariat's practices** to bolster its operational capabilities and working methods with a view of ensuring that the powers vested in it are used to the fullest extent to maximise registrants' observance of the Code of Conduct, minimise incomplete or inaccurate data in the register and promote transparent lobbying practices.
- **Promoting further the use of the Transparency Register** by proactively reaching out to other EU institutions and bodies, to promote further the operating principles of the IIA at EU level.