



Joint Transparency  
Register Secretariat



**Annual Report on the operations of the Transparency Register**  
**2019**

**Presented by the Secretaries-General  
of the European Parliament and the European Commission**

to

**Ms Katarina Barley, Vice-President of the European Parliament**  
and  
**Ms Věra Jourová, Vice-President of the European Commission**

The Interinstitutional Agreement on the Transparency Register signed on 16 April 2014 lays down in paragraph 28 that an Annual Report on the operations of the Transparency Register shall be submitted to the relevant Vice-Presidents of the European Parliament and the European Commission.

This Report presents statistics on the Transparency Register from 1 January to 31 December 2019 and describes the activities undertaken by the Joint Transparency Register Secretariat, in particular with regard to ensuring data quality, monitoring compliance with the Code of Conduct and raising awareness of the scheme.

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Further information can be found on the Transparency Register website:

<http://ec.europa.eu/transparencyregister>

## I. INTRODUCTION

The Transparency Register was set up as a joint scheme by the European Parliament and the European Commission in 2011 by means of an Interinstitutional Agreement<sup>1</sup>. It is a key tool for allowing these two institutions to fulfil their commitment to transparency in their relations with interest representatives. To manage the Transparency Register, the European Parliament and the European Commission maintain a common operational structure, the ‘Joint Transparency Register Secretariat’ (hereinafter: the Joint Secretariat).

The Transparency Register applies to all organisations and self-employed individuals engaged in activities carried out with the objective of influencing the decision-making and policy implementation processes of the EU institutions. All registrants have signed up to a common Code of Conduct. By revealing what interests are being pursued, by whom and with what level of resources, the Transparency Register allows for increased public scrutiny. It gives citizens, the media and stakeholders the possibility to follow the activities and potential influence of interest representatives active on EU legislation. The Transparency Register has grown considerably since its inception and today includes almost 12 000 entities<sup>2</sup>.

## II. STATE OF PLAY<sup>3</sup>

### 1. Distribution of registrants

The Transparency Register is composed of 6 sections and 14 sub-sections.

In 2019, the total number of registrants remained constant as well as the proportion of registrants in each of the six sections.

**Section II** ‘In-house lobbyists and trade/business/ professional associations’ continued to be the largest section of the Register, representing just over half of all the registrants (see pie chart 1), with a slight rise in number of registrants. Within this section, the sub-section ‘Trade and business associations’ still represented the largest portion, comprising just over 40 %. The sub-section ‘Trade unions and professional associations’ remained stable with a share of 15 %, and ‘Companies and groups’ stayed at 39 % (see pie chart 2).

**Section III** ‘Non-governmental organisations’ remained the second most common type of registrants in 2019, representing just over a quarter of all entries.

**Section I** ‘Professional consultancies, law firms or self-employed consultants’ decreased slightly in size for the second consecutive year, representing almost 9 % of all registrants, 1 % less than in the previous year. The drop was visible in all 3 sub-sections.

Fewer entities are registered under the last three sections: **Section IV** ‘Think tanks, research and academic institutions’, **Section VI** ‘Organisations representing local,

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<sup>1</sup> [https://eur-lex.europa.eu/legal-content/en/TXT/?uri=uriserv:OJ.L\\_.2014.277.01.0011.01.ENG](https://eur-lex.europa.eu/legal-content/en/TXT/?uri=uriserv:OJ.L_.2014.277.01.0011.01.ENG)

<sup>2</sup> Counting only entities that were registered and public on 31 December 2019.

<sup>3</sup> Figures presented in this report reflect the situation on 31 December 2019.

regional and municipal authorities, other public or mixed entities, etc.’ and **Section V** ‘Organisations representing churches and religious communities’.

### 1.1 Distribution of registrants per section and sub-section

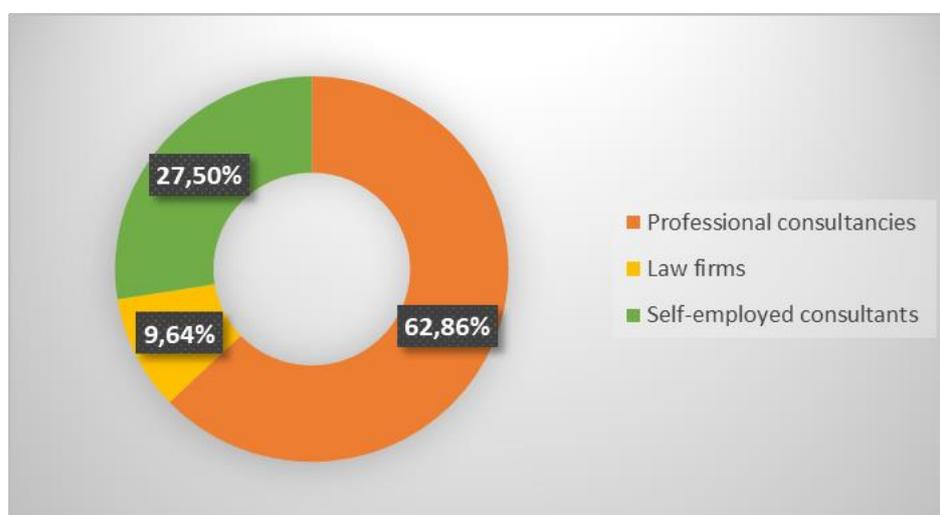
<b>On 31 December 2019, there were 11 899 registrants in the Transparency Register spread across the following sections and sub-sections:</b>	
<b>I - Professional consultancies/law firms/self-employed consultants</b>	<b>1 069</b>
Professional consultancies	672
Law firms	103
Self-employed consultants	294
<b>II - In-house lobbyists and trade/business professional associations</b>	<b>6 197</b>
Companies & groups	2 422
Trade and business associations	2 521
Trade unions and professional associations	937
Other organisations	317
<b>III - Non-governmental organisations</b>	<b>3 112</b>
Non-governmental organisations, platforms and networks and similar	3 112
<b>IV - Think tanks, research and academic institutions</b>	<b>885</b>
Think tanks and research institutions	564
Academic institutions	321
<b>V - Organisations representing churches and religious communities</b>	<b>59</b>
<b>VI - Organisations representing local, regional and municipal authorities, other public or mixed entities, etc.</b>	<b>577</b>
Regional structures	109
Other sub-national public authorities	101
Transnational associations and networks of public regional or other sub-national authorities	91
Other public or mixed entities, created by law whose purpose is to act in the public interest	276

## 1.2 The main sections



## 1.3 Breakdown per sub-section<sup>4</sup>

### **Section I - Professional consultancies/law firms/self-employed consultants**

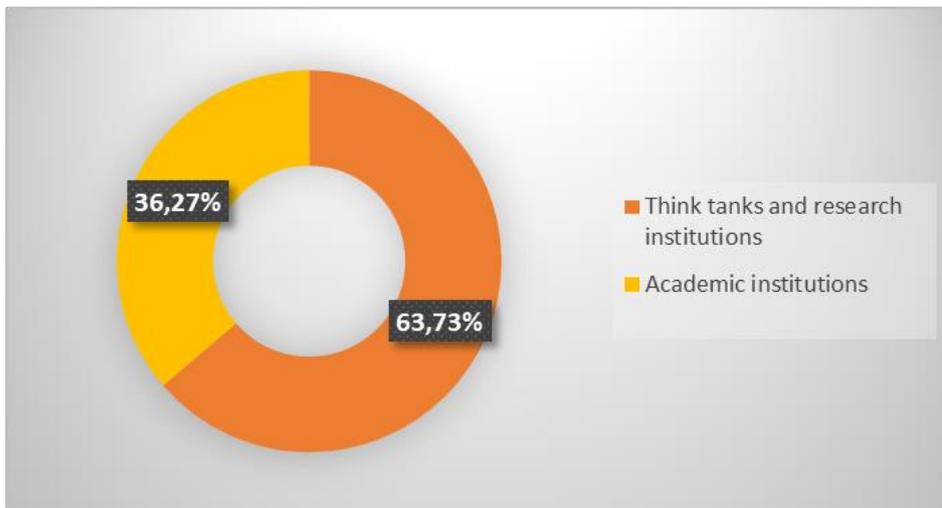


<sup>4</sup> Sections III and V do not have sub-sections, therefore they are not included in the breakdown.

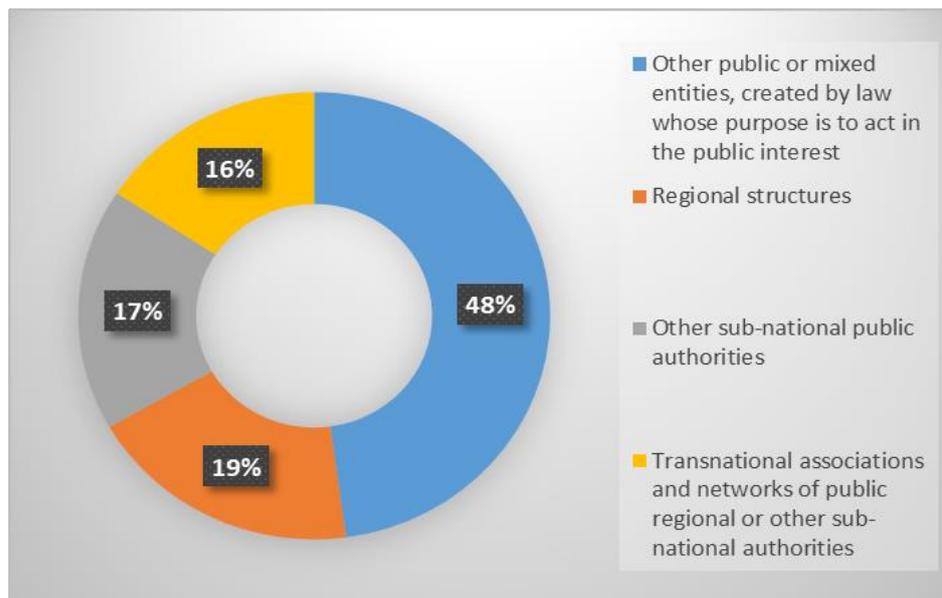
## Section II: In-house lobbyists and trade/business/professional associations



## Section IV: Think tanks, research and academic institutions

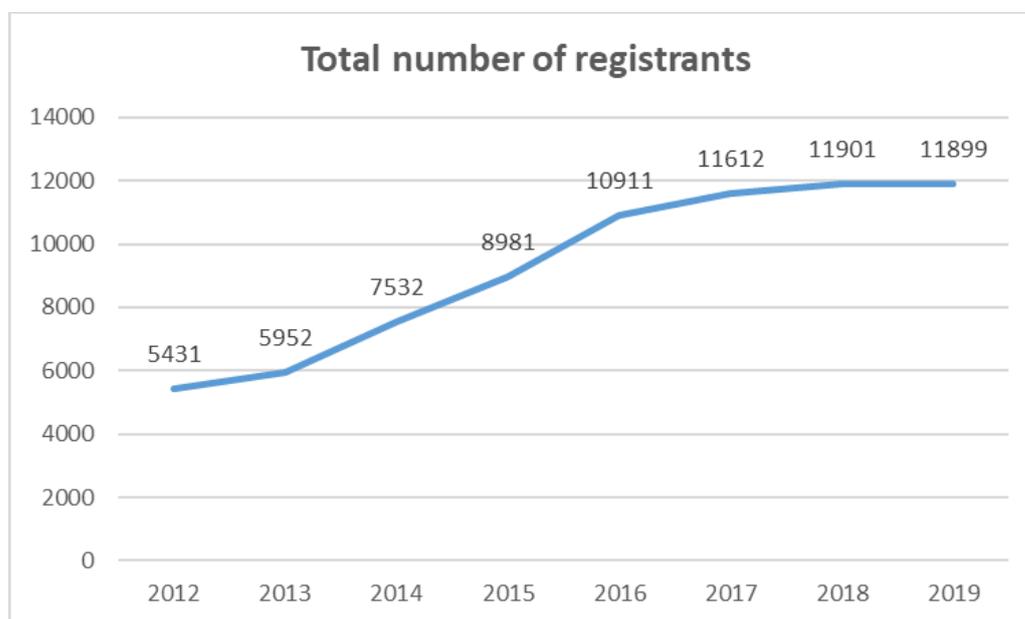


## Section VI: Organisations representing local, regional and municipal authorities, other public or mixed entities, etc.



### 1.4 Evolution

The total number of registrants has remained stable over the last three years, approaching 12 000 entries.

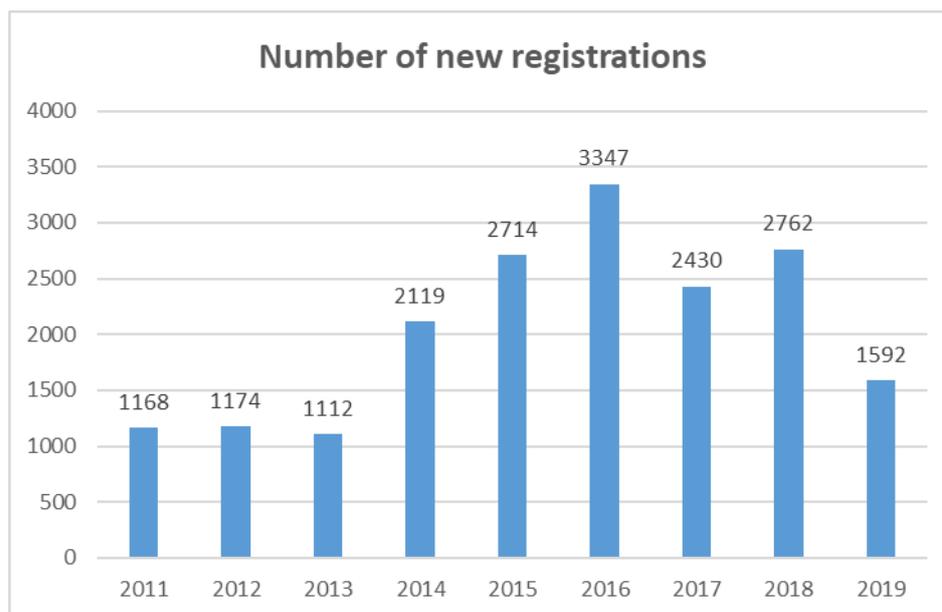


### 1.5 New registrations

There were 1 592 new registrations in 2019<sup>5</sup>. At the same time, about the same number of registrants were removed from the Register for various reasons, such as self-withdrawal, automatic removal caused by failure to perform the mandatory annual update or removal by the Joint Secretariat following a quality check (see chapter III.2). Therefore, the total

<sup>5</sup> Counting only those entities that registered in 2019 and were still public on 31 December 2019. Overall, 2 548 entities attempted to register.

number of registrations remained stable compared to 2018 with 11 899 entities featuring on the Register on 31 December 2019.



The breakdown of new registrations per section was as follows:

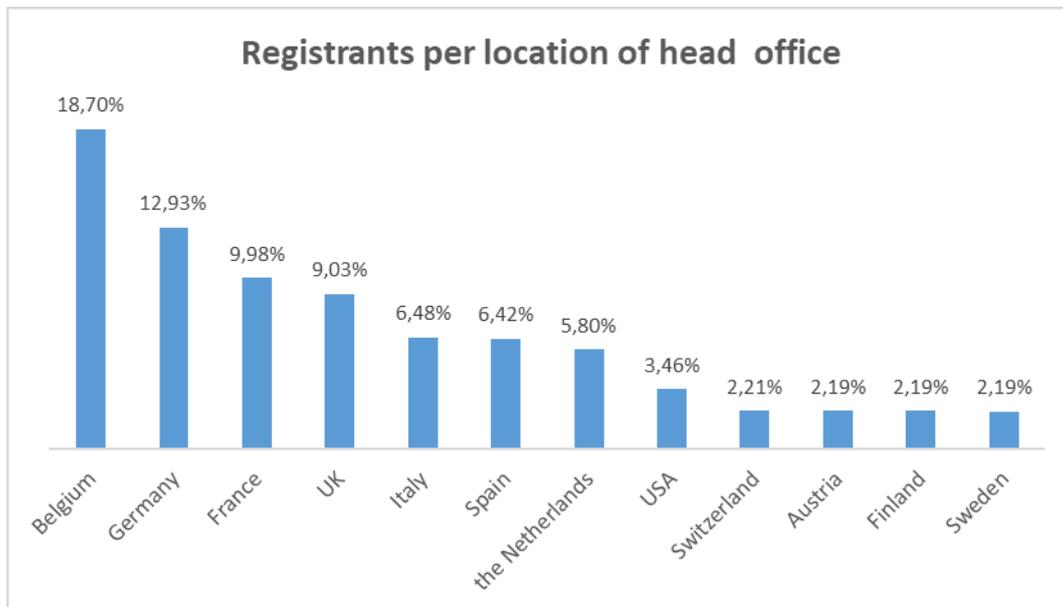
- **Section I** ‘Professional consultancies/law firms/self-employed consultants’ – 121
- **Section II** ‘In-house lobbyists and trade/business professional associations’ – 841
- **Section III** ‘Non-governmental organisations’ – 426
- **Section IV** ‘Think tanks, research and academic institutions’ – 103
- **Section V** ‘Organisations representing churches and religious communities’ – 10
- **Section VI** Organisations representing local, regional and municipal authorities, other public or mixed entities, etc.’ – 91.

#### 1.6 Highest number of registrants per country<sup>6</sup>

Registrants with a head office based in the EU account for almost 91 % of all registrations, the same as the previous year. The remaining 9 % of the registrants are scattered among 87 countries worldwide. Belgium, Germany, France and the United Kingdom host together just over the half of the registered interest representatives (51 %).

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<sup>6</sup> This statistic is based on the location of the registrant's head office as indicated in the registration. Registrants are also asked to declare their EU office in Belgium, if they have one, in addition to the head office.



## 2. Incentives linked to joining the Transparency Register

The European Parliament and the European Commission offer certain incentives for registered interest representatives. Access for interest representatives to decision-makers, premises and certain fora in the European Parliament and the European Commission are subject to registration in the Transparency Register.

For the **European Parliament** advantages linked to registration include:

- *Long-term access to its premises* may only be granted to representatives of registered organisations, after validation by its security service. The validation and renewal procedures all take place online and are usually processed within three working days<sup>7</sup>;
- To be eligible as a *speaker at public hearings* held by parliamentary committees, interest representatives' organisations must be on the Register;
- Registrants can *subscribe to email notifications* on the activities of the European Parliament's Committees via their registration;
- Only registered organisations may support or participate in *activities of Parliament's intergroups or unofficial groupings*;
- When co-organising *events* of political Groups on the European Parliament premises, relevant organisations may be requested to provide registration information;
- Relevant organisations requesting *patronage* by the President of the European Parliament will be requested to provide proof they have registered.

### Accreditation with the European Parliament

Accreditation to European Parliament's premises can be granted for a period of up to one year. The European Parliament granted over 8 500 access authorisations for individuals in 2019, for representatives of more than 2 600 organisations in the Transparency Register (either as a new request or a renewal). This represents an increase compared with 2018.

<sup>7</sup> See also: <http://www.europarl.europa.eu/at-your-service/en/transparency>

For the **European Commission**, the advantages include:

- *Meetings with Members of the Commission, Cabinet members and Directors-General*: interest representatives must be registered in order to obtain such meetings;
- *Public consultations*: registered organisations may choose to be automatically notified about consultations and roadmaps in their areas of interest. The contributions made to the public consultations are integrated in the profile of the registrant.
- *Expert Groups*: registration is required to be appointed as certain types of Expert Group members;
- *Patronage*: the European Commission grants its patronage to interest representatives only if they are registered;
- *Contacts with civil servants*: officials are advised to check whether interest representatives are registered before accepting an invitation to a meeting or to an event. Contacts with non-registered organisations may be restricted.

### 3. Technical developments

#### Technical improvements

The Joint Secretariat coordinates the development of IT solutions to improve the Transparency Register system.

In 2019, a new synergy with the ‘Have your say’ portal<sup>8</sup> was introduced. Contributions to public consultations made by the registrants via the portal (since July 2018) are now integrated into their entry in the Register. This facilitates access to useful information whilst reducing the administrative burden for registrants of listing their contributions manually. This feature complements two other types of integration previously achieved as regards interactions with the European Commission: (i) list of meetings of registrants with Commissioners, their Cabinet members and Directors-General and (ii) membership in the Commission Expert Groups and Other Similar Entities<sup>9</sup> (for type B and C members).

An IT solution facilitates the registration and updating process for new and existing registrants. This mechanism helps registrants to avoid common errors and flags any data inconsistencies to the Joint Secretariat, so it can provide appropriate follow-up. This innovation continued to bring tangible improvements in the overall data quality in the Transparency Register.

Following the revision of the Implementing Guidelines<sup>10</sup>, a series of adjustments were introduced to the registration form and the website. The revision aimed at better assisting registrants to submit and maintain a relevant entry.

Since April 2019, registrants receive automatic reminders at regular intervals during the year to review their entry, complementing the once-a-year reminder for the annual update.

Actions to ensure compliance with the Regulation on the protection of natural persons with regard to the processing of personal data by the EU<sup>11</sup> continued in 2019. The updated

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<sup>8</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say_en)

<sup>9</sup> <http://ec.europa.eu/transparency/regexpert/>

<sup>10</sup> <http://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=GUIDELINES>

<sup>11</sup> Regulation (EU) 2018/1725

privacy statements concerning registrants, meetings with interest representatives and the handling of alerts and complaints were published on the Transparency Register website.<sup>12</sup>

### Visits to the website

In 2019, the Transparency Register website<sup>13</sup> received almost 331 000 visits<sup>14</sup> (27 572 visits per month on average), slightly less than in the previous year. European visitors accounted for 85 % of the visits. Most visits originated from Belgium (30.4 %) followed by Germany (11.1 %), France (10 %) and the United Kingdom (9.3 %). Around 74 % of the visits were direct, while 17 % reached the website via search engines. As regards language preferences, the English version of the webpage generated half of the visits (50 %), followed by French (14 %), German (11 %), Spanish (5.5%) and Italian (5 %).

### EU Open Data Portal

Historical data sets published on the EU Open Data Portal<sup>15</sup> continued to attract attention and generated over 8 000 views in 2019. The datasets allow users to download (in XML or Excel format) the list of persons accredited for access to the European Parliament and the list of organisations featuring on the Transparency Register going back several years. Several interactive data visualisations<sup>16</sup> can also be explored.

## **III. ACTIVITIES OF THE JOINT TRANSPARENCY REGISTER SECRETARIAT**

The Joint Secretariat is made up of a team of officials from the European Parliament and the European Commission. Their work equals approximately six full-time equivalents.

The Joint Secretariat is in charge of the day-to-day management of the Transparency Register. It provides a helpdesk service, issues guidelines for registration, monitors data quality, handles alerts and complaints, coordinates IT development and carries out awareness-raising and other communication activities. The Joint Secretariat operates under the coordination of the Head of the Transparency, Document Management and Access to Documents Unit in the European Commission's Secretariat-General.

### **1. Helpdesk service**

In order to assist registrants, the Joint Secretariat provides a helpdesk service. In 2019, the Joint Secretariat replied to 1 027 individual enquiries submitted via the multilingual 'Contact us' online form, 9 % more than in 2018.

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<sup>12</sup> To consult the privacy statements please visit: <http://ec.europa.eu/transparencyregister/public> > About > Data protection > Privacy statements

<sup>13</sup> <http://ec.europa.eu/transparencyregister/public>

<sup>14</sup> A 'visit' is defined as a visitor coming to the website for the first time. If the same visitor visits a page more than 30 minutes after his last page view, this will be recorded as a new visit.

<sup>15</sup> <https://data.europa.eu/euodp/en/data/dataset/transparency-register>

<sup>16</sup> <http://ec.europa.eu/transparencyregister/public/datavisualisation/>

## 2. Quality checks

**'Quality check'** is a verification carried out by the Joint Secretariat to ensure the accuracy of the data submitted by registrants. The aim is to increase the reliability of the database as a reference tool for interest representation activities.

In 2019, the Joint Secretariat performed 4 559 quality checks in total (on new and pre-2019 registrations), which represents a consistent rise in checks carried out over the past three years<sup>17</sup>. In addition to the standard quality check of each new registration, the Joint Secretariat made greater efforts to identify and require improvements of sub-optimal data in existing registrations.

Up to 53.6 % of the registrations checked were deemed to be satisfactory (2 444). The Joint Secretariat contacted the remaining 46.4 % of the entities (2 115) about their entry. This led to the removal of 1 046 entities for various reasons, such as inconsistent and/or incomplete data, failure to update, duplicate registrations and ineligibility. The remaining 989 entities updated their registration in a satisfactory manner. On 31 December 2019, 80 quality checks were still ongoing.

## 3. Alerts, complaints and own-initiative investigations

**'Alert'** is a mechanism that concerns only point (d)<sup>18</sup> of the Code of Conduct. It allows third parties to inform the Joint Secretariat about entities that might have factual errors in their data.

In 2019, 26 individual alerts were handled by the Joint Secretariat<sup>19</sup> (14 of those were originally received as 'complaints', but were re-qualified as 'alerts'). The alerts concerned 18 different organisations: 11 of the alerts related to one single entity, 6 of the alerts received were about non-registered entities performing activities falling under the scope of the Register. All submitted alerts were closed.

**'Complaint'** is a procedure that concerns allegations by third parties about a breach of the obligations under the Code of Conduct by a registrant, except for those allegations concerning factual errors which are dealt with as 'alerts' (see above).

In 2019, the Joint Secretariat received a total of 30 complaints, of which 8 were admissible as 'complaints'<sup>20</sup> and 14 were re-qualified as 'alerts'. 4 complaints were closed with the respective registrants cooperating with the Joint Secretariat's demands for update or the provision of explanations. One complaint was resolved without intervention by the Joint Secretariat. Investigations into 3 complaints were still ongoing at the end of 2019.

The Joint Secretariat also initiated four **'Own-initiative investigations'** into suspected breaches of the Code of Conduct in 2019, 3 of those were closed by the end of the year.

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<sup>17</sup> The Joint Secretariat performed 3 963 quality checks in 2018 and 3 624 checks in 2017.

<sup>18</sup> Transparency Register's Code of Conduct point (d) provides: '[interest representatives shall] ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading; accept that all information provided is subject to review and agree to co-operate with administrative requests for complementary information and updates'.

<sup>19</sup> Compared with 22 alerts in 2018.

<sup>20</sup> The remaining 8 complaints received were deemed inadmissible either because they concerned matters outside the scope of the Interinstitutional Agreement on the Transparency Register, or because insufficient evidence was provided to substantiate the complaint.

When dealing with investigations, the Joint Secretariat applies the legal principle of the presumption of innocence and the right to be heard, as part of a due process and ensuring proportionality. When the Joint Secretariat establishes a probable issue that needs to be resolved, it enters into a dialogue with the registrant(s) concerned to arrive at a resolution, if possible.

Examples of the issues addressed in the framework of the complaints and own-initiative procedures:

- Using the EU emblem with the aim to give an appearance of a formal relationship with the EU institutions;
- Offering to donate money to a cause of choice if Members of the European Parliament agree to meet with the organisation;
- Carrying out interest representation activities on the premises of the European Parliament without appropriate accreditation;
- Underreporting lobbying expenditure;
- Overstating membership in order to appear more relevant;
- Failing to declare all clients to which services are provided with the aim to conceal its contractual relationships;
- Registering in an inappropriate section and providing an untruthful mission statement;
- Falsely declaring persons to be representatives of the organisation towards the EU institutions.

#### **4. Guidance and awareness-raising**

The Joint Secretariat constantly seeks to raise awareness of the Register. Its members offer training within their respective institutions and participate in external activities aimed at promoting the Transparency Register.

- The European Parliament offered 16 training sessions throughout the year on its transparency policy and related rules for staff of the institution, of which the regular monthly session entitled: ‘Who is lobbying you? - an introduction to the Transparency Register’. In addition, 3 Members requested tailored training for themselves and their staff in 2019;
- The European Commission organised 4 full-day training courses for staff, entitled ‘Dealing appropriately and effectively with lobbyists’. In addition, it delivered 5 internal training sessions on the Transparency Register for newcomers to the Secretariat-General and in response to ad-hoc demands from various departments.

The Joint Secretariat participated in the Annual Meeting of the *European Lobbying Registrars' Network* that took place on 16 May 2019 in Paris, hosted by the French High Authority for Transparency in Public Life (HATVP). This forum creates learning and networking opportunities between representatives from different EU Member States’ public administrations that work in the domain of lobbying regulation and uphold high standards of integrity. The Joint Secretariat also contributed to 2 stakeholder events.

In addition, the European Commission delivered 11 presentations to stakeholders and visitor groups during the year. The European Parliament was invited to present the Transparency Register at 12 events with academics, student groups and national parliamentary delegations interested in lobbying transparency.

## IV. CONCLUSION

Today, the Transparency Register remains one of the biggest of its kind in the world, reaching nearly 12 000 active registrants. It serves as a unique reference database of interest representatives at European level. The number of entries remained stable for the second consecutive year. This leads to the conclusion that, at this point in time, the system may have reached its natural limit, attaining a critical mass of relevant organisations. Any growth in the number of registrants is likely to be incremental as opposed to the rapid expansion that occurred over the initial period of 2013 to 2017.

Improving the overall data quality in the Transparency Register remained a key priority in 2019, as this factor impacts on the reliability and reputation of the system. To this end, the Joint Secretariat carried out 13 % more quality checks than in 2018. This includes checks on new as well as on existing registrations. The new technical solutions implemented facilitate the day-to-day work of the Joint Secretariat, but also lessen the administrative burden of registering and updating for registrants.

Acting as the guardian of the Transparency Register Code of Conduct, the Joint Secretariat handled all alerts and complaints received from third parties in 2019. At the same time, it conducted several ‘own-initiative’ investigations.

In the context of the European Commission Proposal for a new Interinstitutional Agreement on a mandatory Transparency Register<sup>21</sup>, the European Parliament, the Council of the EU and the European Commission continued negotiations on a mandatory EU Transparency Register.

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<sup>21</sup> <http://ec.europa.eu/transparency/regdoc/rep/1/2016/EN/1-2016-627-EN-F1-1.PDF>