



**Annual report on the functioning  
of the Transparency Register  
2021**

**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, signed on 20 May 2021.

This report sets out factual information on the Transparency Register, its content and any changes concerning it in 2021. It also reports on the conditionality and complementary transparency measures, which are in force in the signatory institutions in the same year.

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## I. Executive summary

For the Transparency Register, 2021 marked a special year. It not only marked the 10th anniversary of the inception of the Transparency Register as a joint transparency tool of the European Parliament and the European Commission, but also heralded a new era for interinstitutional cooperation on EU transparency policy, with the Council of the European Union joining in. On 1 July 2021 a new tripartite interinstitutional agreement on a mandatory Transparency Register (IIA) entered into force, with a strengthened approach in terms of joint governance, measures to promote ethical interest representation and new transparency requirements put on interest representatives in relation to their activities vis-à-vis the EU institutions.

This report provides an overview of the implementation of the new IIA (see Sections II & III). It explains how the agreement makes it mandatory, by application of the ‘conditionality’ principle, for interest representatives to register in order to be able to carry out certain types of key interest representation activities at EU level.

The report also outlines several other new features under the new IIA, of which a new and efficient two-layer management structure. A Transparency Register Management Board consisting of the Secretaries-General of the three signatory institutions oversees the work of a Secretariat in charge of the daily management of the register and made up of staff from these three institutions. The Management Board held its inaugural meeting in September 2021 to determine the needs and priorities for the Transparency Register for the upcoming year. Much of the activities of the Secretariat in 2021 (see Section IV) were focused on technical implementation, preparing the Management Board and awareness-raising activities about the new requirements for interest representatives.

The Transparency Register has grown steadily in size, reaching 13 366 registrants on 31 December 2021. From an operational and administrative point of view, it took a major effort to prepare the ground for a smooth transition from the old to the new mandatory system. This included issuing new guidance for applicants and registrants, developing a new registration form and revamping the website. The transition also involved increased helpdesk assistance and awareness-raising actions and events aimed at stakeholders.

Data quality remained a key priority in 2021. All new applications were checked before publication, 452 interest representatives successfully registered using the new registration form, and previously registered interest representatives were given a six month transition period to update to the requirements of the IIA. The migration rate reached 39% on 31 December 2021(see Section V).

## II. Introduction

The Transparency Register is a public database holding up-to-date information about interest representatives actively engaged in activities aimed at influencing the formulation or implementation of policies or legislation at EU level. It gives individuals, the media, stakeholders and EU staff the possibility to track interests represented through the EU institutions, find out who is representing those interests on whose behalf, as well as to see what resources are devoted to the related lobbying activities and efforts. It is one of several transparency tools that aims to improve the transparency and openness of the EU decision-making process.

First set up in 2011 by the European Parliament and the European Commission by means of an interinstitutional agreement, the scheme was reviewed in 2014<sup>1</sup> and has seen a major overhaul in 2021. In order to establish a coordinated approach, consisting in an equivalent regime of transparency of interest representation at EU level, the European Parliament, the Council of the European Union and the European Commission concluded a new IIA<sup>2</sup> in 2021. The new IIA establishes the mandatory Transparency Register as a key tool of the three institutions to improve the transparency of lobbying and to make stakeholders' and civil society's participation in the EU's democratic decision-making process even more visible.

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

### 1. Key features of the 2021 Interinstitutional Agreement

The IIA makes it mandatory for interest representatives to register in order to be able to carry out certain types of key interest representation activities at EU level. The 'conditionality' principle, whereby registration in the Transparency Register is a precondition for carrying out specific activities, is the cornerstone of the IIA and is implemented by means of individual measures adopted by each of the signatory institutions (see Section III).

The IIA is binding on the three signatory institutions. Other EU institutions, bodies, offices and agencies remain free to sign up to the 'conditionality' principle on a voluntary basis and at their own discretion.

When registering, all applicants and registrants agree that they already observe the ethical and behavioural rules and principles set out in the code of conduct (annexed to the IIA), showing their commitment to be eligible to register or remain in the Transparency Register. In addition, they must provide the information specified in Annex II to the IIA.

The IIA introduced several new features and improvements in addition to the 'conditionality' principle:

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<sup>1</sup> Agreement between the European Parliament and the European Commission on the TR for organisations and self-employed individuals engaged in EU policy-making and policy implementation, OJ L 277, 19.9.2014, p. 11-24.

<sup>2</sup> Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory TR, OJ L 207, 11.6.2021, p. 1-17.

- a Transparency Register covering the European Parliament, the Council and the Commission;
- a wide transparency concept, including also transparency measures to encourage registration and strengthen the joint framework, such as the online publication of meetings;
- a broadened and clearer scope of coverage to include, activities carried out on behalf of non-EU country governments or by associations of public authorities and their networks when representing private interests;
- an efficient two-layer management structure (see Section II.2);
- the co-financing by the three institutions of the Transparency Register;
- a sharper focus on the quality of the content of the Transparency Register through the preliminary assessment of the eligibility and data quality of new applications for registration, i.e. requiring monitoring before publication;
- a clearly structured set of administrative procedures for the carrying out of investigations and handling of complaints into alleged infringements of the code of conduct, with due regard to the procedural rights of applicants and registrants;
- the possibility of voluntary involvement of EU institutions, bodies, offices and agencies (other than the signatory institutions);
- dynamic reporting and review processes.

## 2. Governance structure

The Transparency Register has a two-level governance structure: a Management Board that has the overall oversight of the Transparency Register and a Secretariat in charge of its day to day management.

The Management Board oversees the overall implementation of the IIA. In this context, it is responsible for determining the 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 requests to review measures applied by the Secretariat following an investigation.

The Secretaries-General of the European Parliament, the Council and the Commission together make up the Management Board. They meet at least once a year and each Secretary-General holds the chair for an annual term, starting with Secretary-General of the European Parliament in 2021 until end 2022.

The Secretariat offers guidance to interest representatives about the registration process, monitors and verifies the eligibility of applications, and carries out checks on the quality of information provided by registrants. It handles complaints concerning alleged breaches of the code of conduct by registrants and can apply measures where it deems the complaint to be justified. The Secretariat also prepares the annual report and raises awareness about the Transparency Register (see Section IV).

The Secretariat is made up of staff from the three signatory institutions, amounting to nine full-time employees (one more compared to 2020 due to the fact that the Council joined as of July 2021). It operates under the coordination of its coordinator, who represents the Secretariat

at the Management Board and in public. In 2021, the head of the unit responsible for transparency in the European Commission's Secretariat-General was the designated coordinator of the Secretariat.

### 3. Implementation and transition period

The IIA entered into force on 1 July 2021. It introduces new information requirements for applicants and registrants. Those requirements are set out in Annex II to the IIA. On the financial information to be provided, registrants now need to select the type of interests they represent (own interests or those of their members, the interests of clients, or non-commercial interests), in order to determine the most relevant financial information (Section V).

On 20 September 2022, the Secretariat published a new application/registration form on the Transparency Register website to enable applicants and registrants to satisfy the new information requirements. All new applicants submitting an application for registration have had to fill in the new form and were subject to an eligibility check before publication on the Transparency Register. In addition, all existing registrants who were entered in the Transparency Register before that date were informed that, for a period of six months<sup>3</sup>, they were entitled to amend their registration according to the new form in order to remain on the Register.

To raise awareness of and ease the registration of interest representatives and their transition to the new system, the Secretariat published new guidelines for applicants and registrants and a new expanded list of Frequently Asked Questions on the Transparency Register website. Before establishing the new detailed guidance, the Secretariat consulted Transparency Register stakeholders through an online questionnaire in June 2021<sup>4</sup>. The Secretariat also provided detailed information on the new governance structure of the Transparency Register and on the conditionality and other transparency measures in force in the EU institutions on dedicated subpages of the website.

As a run-up to the new registration process, the Secretariat held a series of meetings with representative bodies, i.e. actors representing the various types of registrants present on the Transparency Register, in order to present the new framework and address specific questions and requests for information and further guidance (see Section IV.5).

## III. Conditionality and complementary transparency measures

The European Parliament, Council and Commission adopt conditionality measures when they decide to make certain interest representation activities conditional upon prior registration in the Transparency Register. The three institutions may also adopt complementary transparency measures to further encourage registration and strengthen the joint framework.

The conditionality and complementary transparency measures that are currently in force in each of the three institutions are detailed below.

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

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<sup>3</sup> From 20 September 2021 to 19 March 2022 (included).

<sup>4</sup> The responses to the stakeholder consultation are available on EUSurvey at this link: <https://ec.europa.eu/eusurvey/publication/2021-IIA-Guidelines-consultation>.

conditionality or complementary transparency measures that they adopt and ask for their publication on the Transparency Register website. In 2021, no such notifications were communicated to the Management Board.

All Member States committed, during their term of office as Presidency of the Council and in the six months preceding this term, to make meetings with interest representatives and their respective Permanent Representative and Deputy Permanent Representative to the EU conditional on the registration of such interest representatives in the Transparency Register. That conditionality measure applies to the meetings organised with the Permanent Representative and Deputy Permanent Representative when acting in their capacity of acting or incoming Presidency of the Council<sup>5</sup>. Therefore, interest representatives must not be able to participate in such meetings unless they are registered. In 2021, this applied to Slovenia<sup>6</sup> as they were holding the Presidency of the Council of the EU, and France<sup>7</sup> as the incoming Presidency.

### *European Parliament*

Taking into account their specific role and mandate, Members of the European Parliament, are recommended<sup>8</sup> to only meet interest representatives registered in the Transparency Register. All Members are also encouraged to publish online all meetings scheduled with interest representatives.

These meetings are published on the individual profile pages of each Member on Parliament's official website. It is an obligation however for rapporteurs, shadow rapporteurs and committee chairs to publish online all scheduled meetings with interest representatives for each parliamentary report. The data published displays the date and type of meeting held, the subject matter of the meeting, the interest representative met with and the role of the Member (i.e. as a rapporteur, shadow, committee chair or as an Member with no specific responsibility for the file).

Parliament staff members, as indeed all EU civil servants, are obliged to maintain their professional and personal independence. They must therefore act in a manner consistent with the independence of their position and are therefore recommended to check whether interest representatives are registered before meeting them or accepting an invitation to an event.

The European Parliament has decided that only interest representatives who are registered can participate in the intergroups or other unofficial groupings<sup>9</sup> activities. It also requires<sup>10</sup> that speakers in its committee hearings are registered. The European Parliament has also recommended to its Members that they check if the interest representatives with whom they want to co-host or co-organise an event on the European Parliament's premises, are registered<sup>11</sup>. The European Parliament provides that only registered interest representatives

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<sup>5</sup> <https://ec.europa.eu/transparencyregister/public/openFile.do?fileName=Transparency%20register%20-%20Member%20states%27%20political%20declaration.EN.pdf>.

<sup>6</sup> <https://www.gov.si/en/representations/permanent-representation-to-the-european-union-brussels/about-the-permanent-representation-to-the-european-union-brussels/transparency-register/>.

<sup>7</sup> <https://ue.delegfrance.org/registre-de-transparence>.

<sup>8</sup> [European Parliament Rules of Procedure \(Rule 11 \(2\)\)](#).

<sup>9</sup> [EP Rules of Procedure: Rule 35 \(5\)](#).

<sup>10</sup> [Article 7 of the Decision of the Bureau of the European Parliament of 18 June 2003](#).

<sup>11</sup> [EP Bureau decision of 4 July 2016](#).

can be issued with long-term access badges<sup>12</sup>. As an additional transparency measure, registrants can sign up to receive automatic updates on the activities of parliamentary committees by email.

In view of previous commitments made, notably in a plenary resolution adopted on 27 April 2021<sup>13</sup>, the European Parliament has set up an internal administrative working group to prepare for the follow-up related to the IIA. Based on its recommendations, the European Parliament's Bureau will be responsible for deciding on any new conditionality or other transparency measures in Parliament.

### *Council of the EU*

As set out in Council Decision (EU) 2021/929<sup>14</sup>, registration in the Transparency Register is a precondition for interest representatives to meet the Secretary-General of the Council or Directors-General. The same rule applies for the participation of 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 in public events organised by the General Secretariat of the Council. Furthermore, staff are requested to check the credentials of interest representatives in order to ensure that they have an entry in the Transparency Register. If that is not the case, staff should carefully consider the appropriateness of meetings, and consult with their line manager.

### *European Commission*

The Commission applies a strict internal conditionality regime based on the 'not on the Transparency Register, no meeting' principle in relation to its contacts and interactions with interest representatives. In particular, it requires all Members of the Commission, members of their Cabinets and Directors-General of the Commission to meet only interest representatives that are registered in the Transparency Register. That obligation, enshrined in the Code of Conduct for the Members of the European Commission<sup>15</sup> and the Commission's Working Methods<sup>16</sup>, entails, in practice, that an interest representative needs to be registered before such meetings take place. Furthermore, the Commission addresses, as part of its practical guides to staff ethics and conduct, a standard recommendation to all its staff to check the credentials of interest representatives in order to ensure that they have an entry in the Transparency Register. If they are not in the Register, staff are advised to always invite them to register before engaging in any further contacts.

The Commission's rule to not hold meetings with non-registered interest representatives is coupled with and supplemented by its policy on the compulsory publication of meetings with (registered) interest representatives, in line with its Decisions 2014/838/EU, Euratom<sup>17</sup> and

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<sup>12</sup> Rule 123 of the European Parliament's Rules of Procedure.

<sup>13</sup> [https://www.europarl.europa.eu/doceo/document/TA-9-2021-0130\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-9-2021-0130_EN.html).

<sup>14</sup> OJ L 207, of 11.6.2021, p. 19.

<sup>15</sup> 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.

<sup>16</sup> Point V of the Working Methods of the European Commission.

<sup>17</sup> Commission Decision 2014/838/EU, Euratom of 25 November 2014 on the publication of information on meetings held between Directors-General of the Commission and organisations or self-employed individuals, OJ L 343, 28.11.2014, p. 19-21.

2014/839/EU, Euratom<sup>18</sup>. The information that is made public consists of the date of the meeting, the location, the name of the Member of the Commission and/or Member of the Cabinet or the Director-General, the name of the interest representative, i.e. organisation or self-employed individual and the subject of the meeting. The Commission publishes systematically that information in a standardised format on the websites of the Members of the Commission, and of Directorates-General of the Commission respectively, within two weeks following the meeting. A list of published meetings, in downloadable form (.pdf file) is also made available on the profile of the registrant(s) concerned in the Transparency Register.

Furthermore, the Commission, in line with its relevant Commission rules<sup>19</sup>, reserves the appointment of interest representatives in Commission expert groups only to registered interest representatives. That requirement of prior registration in the Transparency Register applies to both individuals appointed to represent a common interest shared by stakeholders in a particular policy area (Type 'B' members) as well as organisations in the broad sense of the word, including companies, associations, non-governmental organisations, trade unions, universities, research institutes, law firms and consultancies (type 'C' members). Where Type B and C members are suspended or removed from the Transparency Register, the Commission must suspend them from the expert group(s) of which they are members as long as their registration in the Transparency Register is not re-established.

As a further measure to improve transparency and encourage registration, the Commission provides automatic alerts to registrants that have specified in their registration an interest in (a) particular policy area(s) of the launch of a public consultation or a roadmap in the relevant field(s) and processes contributions from registrants separately from those of non-registered respondents<sup>20</sup>.

## IV. Activities of the Transparency Register Secretariat

For the Transparency Register, 2021 marked a special year. As mentioned above, the Secretariat took specific actions throughout the year to implement the IIA (see Section II.3) and ensure a smooth transition to the new mandatory scheme, while also continuing with its day to day activities, as further illustrated below.

### 1. Data quality monitoring

The Transparency Register offers a snapshot of the lobbying activities of interest representatives associated with the formulation or implementation of (a) policy cycle(s) and the related decision-making processes of the EU institutions, including specific details on the main legislative proposals or policies targeted by the activities of registrants covered by the IIA at a given moment. This explains why some interest representatives are only registered for a limited period of time, while others may remain in the database for a longer period.

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<sup>18</sup> Commission Decision 2014/839/EU, Euratom of 25 November 2014 on the publication of information on meetings held between Members of the Commission and organisations or self-employed individuals, OJ L 343, 28.11.2014, p. 22-24.

<sup>19</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>20</sup> Better Regulation Guidelines of the European Commission (SWD(2017)350), in particular Chapter VII Guidelines on Stakeholder Consultation.

By registering, interest representatives commit to providing information that is complete, up-to-date and not misleading upon registration, and subsequently in their ongoing performance of activities covered by the IIA. To that end, registrants are encouraged to review and update the information provided as soon as any major changes occur and to perform an obligatory annual update of the registration in order to remain in the Transparency Register. Interest representatives are ultimately responsible for the accuracy of their registration data.

Ensuring the best possible quality of data in the Transparency Register is one of the main tasks of the Secretariat. According to the IIA, the Secretariat assesses all new applications for registration against the eligibility criteria and information requirements before such applications can be validated and published on the register<sup>21</sup>. It further reviews the content of the Transparency Register in a more targeted approach, in particular in circumstances where it has reasons to believe that registrations do not accurately provide the information specified in the IIA. In an effort to increase the reliability of the database as a reference tool, the Secretariat contacts the registrants on a case-by-case basis, to check the accuracy of the information they have provided, ask for the correction of any inconsistencies and ensure that the necessary information is published.

In the context of its monitoring activities in 2021, the Secretariat carried out 3 360 checks<sup>22</sup>. These include 2 592 quality checks carried out during the period from 1 January 2021 to 20 September 2021 (launch of the new registration form):

- 40% of registrations checked provided satisfactory data quality;
- 30% of contacted registrants updated their registrations;
- 30% were removed from the register following the check, for ineligibility or failure to update.

The remaining 768 eligibility and quality checks concerned the applications submitted following the launch of the new registration form, out of which 452 (58%) were accepted and activated<sup>23</sup>.

## 2. Helpdesk service

The Secretariat provides a helpdesk service to answer questions about the Transparency Register that anyone can submit via the multilingual website ('Contact us' tab). In 2021, the Secretariat answered a significant number of inquiries and requests for information about the Transparency Register from stakeholders, researchers and individuals, as well as requests for support and guidance from applicants and registrants during the registration process<sup>24</sup>. In particular, after introducing the new registration form and mainly on the technical problems encountered by registrants during their migration to the new system.

## 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

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<sup>21</sup> That is the case for all new applications for registration submitted as of 20 September 2021.

<sup>22</sup> In 2020, a total of 4 973 checks were performed on the content of the register. In 2021, the overall figure was lower due to the transition to the new mandatory system.

<sup>23</sup> See Section V.

<sup>24</sup> In 2021, the Secretariat answered around 1 255 inquiries and requests.

procedures laid down in Annex III to the IIA. In doing so, the Secretariat takes into account the principles of proportionality and good administration.

*'Complaint'* refers to a procedure that concerns allegations about a registrant's non-observance of the code of conduct. Any natural or legal person making such allegations against a registrant may lodge a complaint with the Secretariat by filling in the relevant form on the Transparency Register website.

By registering, interest representatives agree that they already apply the rules and principles of the code of conduct, and accept that any complaint will be handled according to the procedures laid down in Annex III to the IIA.

The IIA has done away with the concept of 'alerts', whereby third parties could inform the Secretariat about factual errors and other inaccurate information contained in the Transparency Register. The change implies that such 'alerts' become complaints under the new system. Still, since the IIA only entered into force on 1 July 2021, the Secretariat handled in 2021 eight alerts (one was initially received as a complaint) submitted by eight different organisations or individuals pointing out potential errors contained in seven registrations. These alerts concerned the accuracy of the financial declarations and other data provided by the registrants, and lack of or incorrect information about meetings held by the registrants with the EU institutions. All registrants contacted by the Secretariat in this context updated their data in a satisfactory manner, with the exception of one, which was removed from the Transparency Register.

In 2021, the Secretariat successfully closed four complaints pending from the previous year, after the respective registrants updated their registration or otherwise provided satisfactory explanations.

Moreover, the Secretariat received 29 new complaints in 2021, of which one was dealt with as an 'alert' since it concerned only data quality issues and was submitted before the entry into force of the IIA. Of the remaining complaints, 23 were deemed inadmissible, as they did not concern matters falling within the Transparency Register. This is an unusually high number of inadmissible complaints, highlighting that, during the COVID-19 pandemic, a very large number of consumers or other individuals acting in a personal capacity sought to make complaints concerning personal matters by addressing, in this context, the wrong public service.

Of the five admissible complaints, one was closed in 2021 and investigations into the remaining four admissible complaints were ongoing at the end of 2021. They related mainly to the quality and accuracy of the information included in the registration forms of the organisations against which the complaints were submitted, and were ongoing due to the transition period that started during the second half of 2021, whereby registrants must comply with new requirements as set out in the 2021 IIA.

When handling an investigation, the Secretariat always seeks to ensure a constructive dialogue with the registrant(s) concerned in order to clarify and resolve the identified issues, as far as possible, prior to taking any necessary measures.

#### 4. 2021 Management Board meeting

The Secretariat prepared the first meeting of the Management Board, which took place on 24 September 2021. At that meeting, the Management Board took the following decisions:

- appointment of the Head of the Unit responsible for transparency in the Commission's Secretariat-General as Coordinator of the Secretariat for the remaining period of 2021 and for a renewable term of one year as of 2022;
- determination of the annual priorities for the Transparency Register in 2022, together with the budget estimates and shares for the implementation of those priorities for each signatory institution to the IIA<sup>25</sup>;
- instruction to the Secretariat, as part of the 2022 annual priorities, to undertake an assessment of the performance of the Transparency Register IT tool.

All documents about the meeting of the Management Board, including the agenda and minutes of the meeting, were published on the governance subpage of the Transparency Register website.

#### 5. Guidance and awareness raising

The Secretariat issues guidelines for applicants and registrants and other guidance with practical information to clarify and explain in more detail certain provisions of the IIA. Such guidance is the result of regular exchanges with stakeholders and aims at supporting registrants in their efforts to provide accurate information and avoid common mistakes.

As mentioned above, in 2021 the Secretariat published new guidelines and a new list of Frequently Asked Questions in all 23 official languages.

In addition, the Secretariat undertook a series of communication and awareness-raising actions aimed at stakeholders with a view of presenting and explaining the IIA and the accompanying new guidance. This included informative sessions for various stakeholders<sup>26</sup> and university students<sup>27</sup>.

The three institutions continued their efforts to raise awareness of the Transparency Register also within each institution, including dedicated information and training sessions provided to staff<sup>28</sup>.

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<sup>25</sup> For 2022: EC: 57%; EP: 33%; Council: 10%.

<sup>26</sup> European Central Bank (ECB), French High Authority for Transparency in Public Life (HATVP), European Public Affairs Consultancies Association (EPACA), Federation of German Industries (BDI/BDA), Legal affairs Commission of the Bishops' Conferences of the European Union (COMECE) and European Lobbying Registrars' Network (ELRN).

<sup>27</sup> Science Politique Paris, University of Paris Nanterre, Maastricht University, the Scottish Stirling University, Freshfel East Africa Delegation, Bocconi Law Students Association and the Geneva Graduate institute.

<sup>28</sup> This includes 18 remote live trainings on 'how to deal with lobbyists' for staff in the European Parliament. The Commission also provided 8 such trainings to its own staff as well as tailored presentations to Cabinets of Members of the Commission and to their network of transparency and ethics contact points. In the Council, a series of communication and awareness-raising actions were undertaken in order to present and explain the IIA and the practical implementation of Council Decision (EU) 2021/929.

## 6. Technical developments

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

The entry into force of the 2021 IIA required a major effort on the technical side to adjust the Transparency Register website to the IIA, in particular concerning the development of the new application form adapting to the new information requirements. The form was made available in all language versions by the end of 2021.

In addition, the back-office IT tools used by the Secretariat's staff to handle the day to day management of the Transparency Register had to be aligned to the new framework.

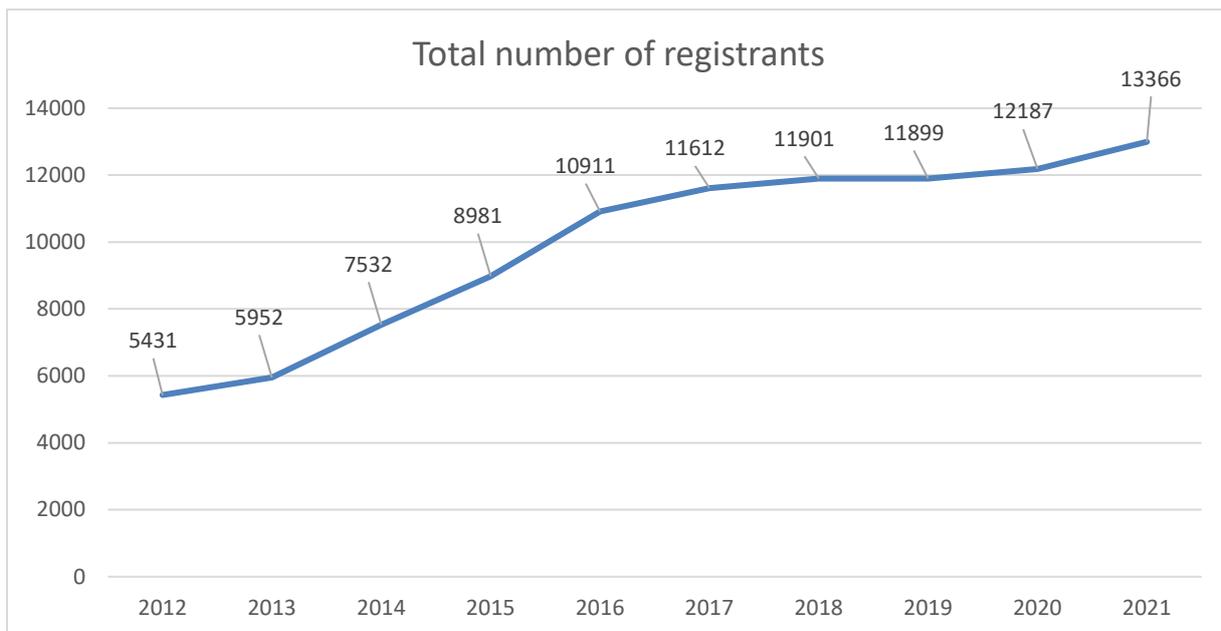
At its meeting of 24 September 2021, the Management Board instructed the Secretariat to assess the performance of the 10-year old IT platform underpinning the Transparency Register. In this context, an IT Working Group was set up at the end of 2021 to explore the available options for ensuring that the register remains a viable and modern IT tool.

## V. Statistics

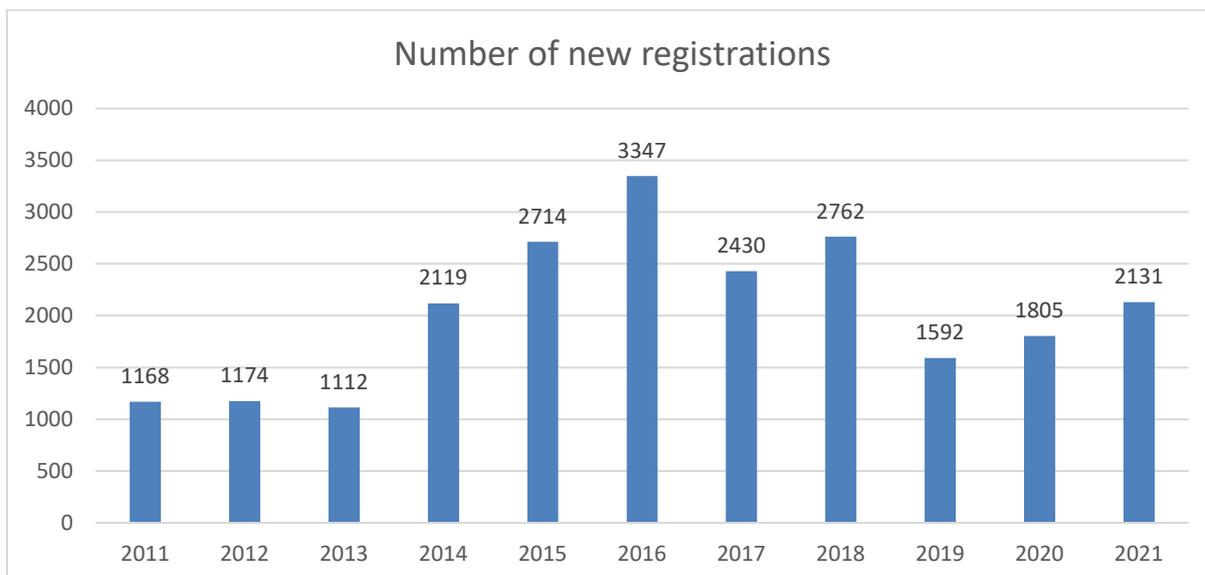
The entry into force of the IIA changed the typology of registrants on the Transparency Register. Indeed, registrants are now required to select one of three types of interests represented, with different corresponding bands of financial information applicable to each category. Consequently, the part of the report presenting the various types of registrants is broken down into two parts, covering the statistical information for the periods before and after 20 September 2021 (See Sections V.2 and V.3).

### 1. Evolution of the Transparency Register

Since its inception as a joint public database of the European Parliament and the European Commission to the current tripartite mandatory scheme, the Transparency Register has grown steadily in size, rising to 13 366 registrants on 31 December 2021. While this evolution shows an increase in absolute terms, the database changes daily, as interest representatives register, unregister, re-apply to register or are removed, depending on their lobbying activities at any given moment.



The chart below shows the evolution of new registrations, including only those interest representatives registered over a period over 12 months, between 1 January 2021 and 31 December 2021, and which were still active at the end of that period<sup>29</sup>.



## 2. Categories of registrants between 1 January 2021 and 20 September 2021

Until 20 September 2021, the Transparency Register was composed of interest representatives classified under 6 predefined sections and 14 sub-sections, provided for in the 2014 Interinstitutional Agreement and corresponding to the various types of organisations.

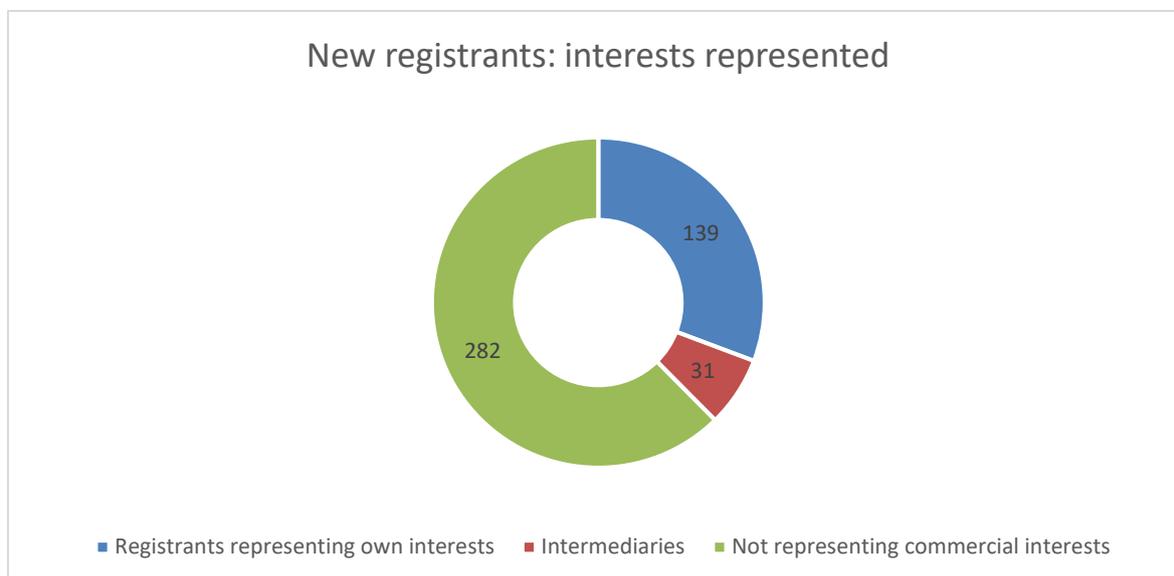
<sup>29</sup> In total, 3 360 entities applied to register in 2021.

The breakdown of registrants across the sections and sub-sections provided for in the 2014 IIA is set out in the table below.

<b>On 20 September 2021, there were 12 914 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>904</b>
Professional consultancies	580
Law firms	94
Self-employed consultants	230
<b>II - In-house lobbyists and trade/business professional associations</b>	<b>6 952</b>
Companies and groups	2 905
Trade and business associations	2 715
Trade unions and professional associations	987
Other organisations	345
<b>III - Non-governmental organisations</b>	<b>3 518</b>
Non-governmental organisations, platforms and networks and similar	3 518
<b>IV - Think tanks, research and academic institutions</b>	<b>967</b>
Think tanks and research institutions	602
Academic institutions	365
<b>V - Organisations representing churches and religious communities</b>	<b>55</b>
<b>VI - Organisations representing local, regional and municipal authorities, other public or mixed entities, etc.</b>	<b>573</b>
Regional structures	118
Other sub-national public authorities	95
Transnational associations and networks of public regional or other sub-national authorities	77
Other public or mixed entities, created by law whose purpose is to act in the public interest	283

### 3. Interests represented between 21 September and 31 December 2021

Following the introduction of the new registration form, 452 interest representatives signed up to the Transparency Register. Most of those were organisations not representing commercial interests, as shown in the chart below.



Those new registrants were broken down into the following sections:

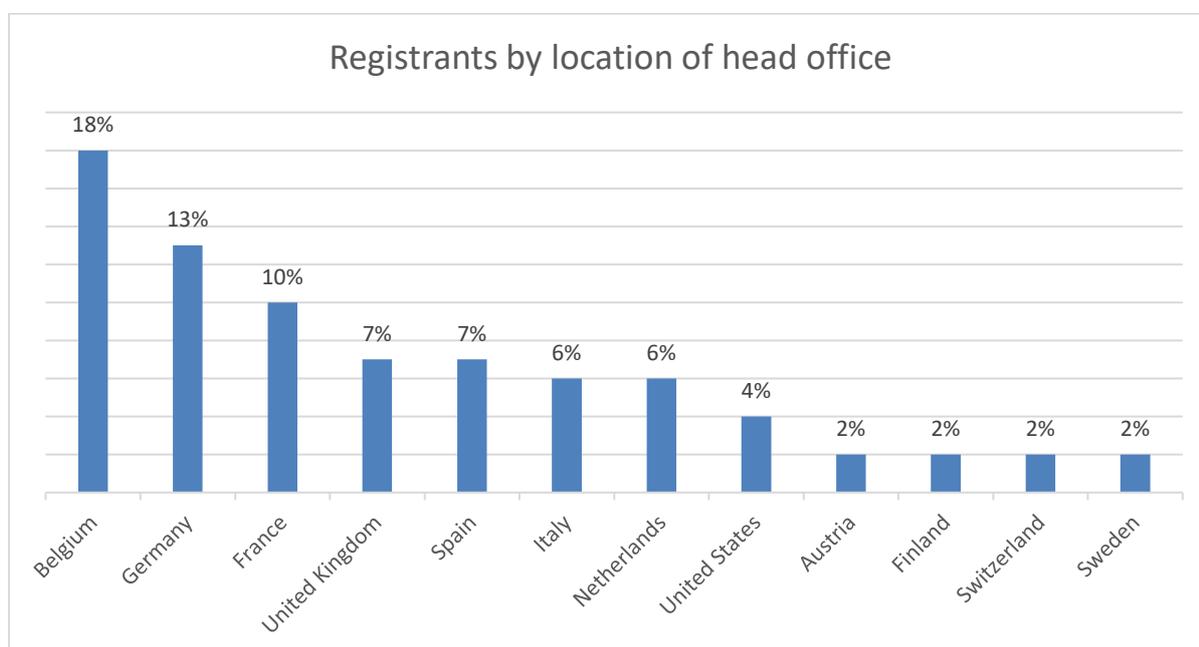
Professional consultancies	27
Law firms	7
Self-employed consultants	10
Companies and groups	157
Trade and business associations	41
Trade unions and professional associations	29
Non-governmental organisations, platforms and networks and similar	123
Think tanks and research institutions	21
Academic institutions	7
Organisations representing churches and religious communities	1
Associations and networks of public authorities	7
Entities, offices or networks established by third countries	0
Other organisations, public or mixed entities	22

#### 4. Migration rate

The registrants featured in the Transparency Register before 20 September 2021 were given a six month transition period to update their registrations to ensure compliance with the IIA (by 19 March 2022). The migration rate reached 39% on 31 December 2021.

#### 5. Geographical data

Registration on the Transparency Register is not limited to interest representatives established in the EU, although the largest group of interest representatives do carry out their activities from an establishment in Belgium. This is due to the EU institutions being located in Brussels. However, since the scope of EU legislation and policy also affects non-Europeans and can have an impact on trade and other external relations beyond the borders of the 27 Member States, this global reach is also reflected in the Transparency Register.



#### 6. Transparency Register website visits

In 2021, the Transparency Register website received 326 700 visits. For the purposes of this statistical overview, a ‘visit’ is defined as a visitor accessing the website for the first time. If the same visitor remains on a single page more than 30 minutes after their last page view, this counts as a new visit. On average, this breaks down to around 27 200 visits per month.

Around 54% of website visitors used the search function in English, while the homepage was most frequently visited in English, followed, in descending order, by French, German, Spanish and Italian. Almost 86% of visits come from users in Europe, followed by almost 9% of visits originating in north America. Within Europe, 27% of visits to the website originated in Belgium, followed by those originating in Germany, France (around 10%) and United Kingdom (around 9%).

In 2021, the two open data portals used for Transparency Register data (the one for EU institutions with about 16 000 datasets and the one for Member States with about 1 300 000 datasets) were consolidated into ‘[data.europa.eu](https://data.europa.eu)’. Furthermore, following the launch of the

new registration form on 20 September 2021, the functionality allowing for the transfer of the Transparency Register dataset to the Open Data Portal was temporarily suspended, due to the changes in the structure of the new form.

Despite the above-mentioned suspension, in 2021 the Transparency Register dataset transferred to the consolidated [data.europa.eu](https://data.europa.eu) was the 12th most viewed dataset among more than 1 300 000<sup>30</sup> datasets published there. The datasets allow users to download (in xml or Excel format) the list of people accredited for access to the European Parliament' premises and the list of organisations featuring on the Transparency Register going back several years.

## VI. Conclusions

Due to entry into application of the IIA, 2021 proved to be a particularly challenging year. From an operational and administrative point of view, it took major efforts to prepare the ground for a smooth transition from the old to the new mandatory system. This included issuing new guidance for applicants and registrants and implementing technical solutions adjusting to the new requirements resulting from the IIA, in particular developing a new registration form and revamping the Transparency Register website. The transition to the new system also increased the number of direct requests for helpdesk assistance as well as for the Secretariat's increased participation in awareness-raising actions and events aimed at stakeholders.

The period in which registrants are entitled to amend their registration to satisfy the information requirements of the IIA ended on 19 March 2022. It follows that the application of two different sets of rules in 2021, before and after the IIA, made it particularly challenging to monitor data quality. Nonetheless, the overall data quality in the Transparency Register remained a key priority in 2021, with all new applications for registration submitted based on the new registration form being checked before their publication, thereby ensuring the non-inclusion of registrations not meeting the eligibility and data quality standards.

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<sup>30</sup> Datasets from EU institutions, agencies and bodies, Member States and other countries, as well as certain local authorities.