

# **TRANSPARENCY REGULATIONS AND ETHICAL LOBBYING IN THE EU**

**26 June 2025**

**Public Affairs Council – The Brussels Study Tour 2025**

Presented by

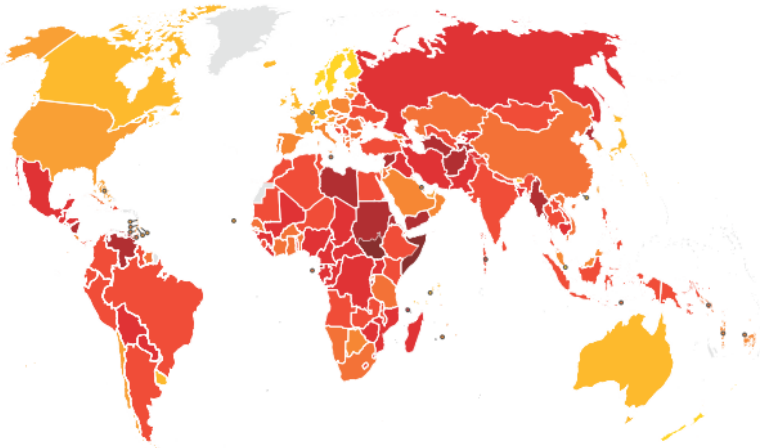
**Raphaël Kergueno – Senior Policy Officer**

# TRANSPARENCY INTERNATIONAL THE GLOBAL ANTI-CORRUPTION MOVEMENT

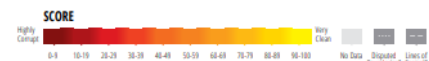


## CORRUPTION PERCEPTIONS INDEX 2024

The perceived levels of public sector corruption in 180 countries/territories around the world.



SCORE	COUNTRY/TERRITORY	SCORE	COUNTRY/TERRITORY	SCORE	COUNTRY/TERRITORY	SCORE	COUNTRY/TERRITORY	SCORE	COUNTRY/TERRITORY
90	Denmark	67	Taiwan	53	Georgia	42	Ghana	34	Algeria
88	Finland	65	Bahamas	53	Poland	41	Burkina Faso	28	Bolivia
84	Singapore	65	United States	51	Mauritius	41	Cuba	28	Guinea
83	New Zealand	64	Israel	50	Malaysia	41	Malawi	27	Eswatini
81	Luxembourg	64	Korea, South	50	Vanuatu	41	Nepal	27	Gabon
81	Norway	63	Chile	49	Greece	41	Niger	27	Liberia
81	Switzerland	63	Lithuania	49	Jordan	41	Thailand	27	Mali
80	Sweden	63	Saint Vincent and the Grenadines	49	Namibia	41	Turkey	27	Pakistan
78	Netherlands	62	Cabo Verde	49	Slovakia	40	Belarus	26	Cameroon
77	Australia	60	Dominica	47	Armenia	40	Bosnia and Herzegovina	26	Iraq
77	Iceland	60	Slovenia	47	Croatia	40	North Macedonia	26	Madagascar
77	Ireland	59	Latvia	46	Kuwait	40	Suriname	26	Mexico
76	Estonia	59	Qatar	46	Malta	40	Vietnam	26	Nigeria
76	Uruguay	59	Saint Lucia	46	Montenegro	39	Colombia	26	Uganda
75	Canada	58	Saudi Arabia	46	Romania	39	Guyana	25	Guatemala
75	Germany	58	Costa Rica	45	Benin	39	Tunisia	25	Kyrgyzstan
74	Hong Kong	57	Sao Tome and Principe	45	Côte d'Ivoire	38	Zambia	25	Mozambique
72	Bhutan	57	Portugal	45	Senegal	38	Gambia	24	Central African Republic
72	Seychelles	57	Rwanda	44	Jamaica	38	India	24	Paraguay
71	Japan	56	Cyprus	44	Kosovo	37	Maldives	24	Bangladesh
71	United Kingdom	56	Czechia	44	Indonesia	37	Argentina	23	Congo
69	Belgium	56	Grenada	43	Timor-Leste	37	Ethiopia	23	Iran
68	Barbados	56	Spain	43	Bulgaria	37	Lebanon	23	Azerbaijan
68	United Arab Emirates	55	Fiji	43	China	36	Dominican Republic	22	Honduras
67	Austria	54	Oman	43	Moldova	35	Serbia	22	Russia
67	France	53	Bahrain	42	Albania	35	Ukraine	21	Cambodia
								21	Chad



#CPI2024

[www.transparency.org/cpi](https://www.transparency.org/cpi)

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- Transparency International is a **global movement** working in > 100 countries to end the injustice of corruption.
- CPI 2024 edition highlights most **vulnerable countries** to climate change score **below 50**
- Transparency International EU **leads the movement advocacy towards EU institutions**, together with **22 national EU chapters**.
- TI EU **objective**: foster a more **transparent, accountable & inclusive** EU policy-making

## LOBBYING: THE TI DEFINITION

...Any **direct or indirect** communication with public officials or representatives, carried out by or on behalf of an organised group, with the purpose of **influencing public decision-making**...

## WHY DOES IT MATTER ? LOBBYING AFFECTS US ALL

- Lobbying is part of the **democratic-process**: rules designed to professionalise the activity
- All lobbyists are **tarred with the same brush**: no distinction between different types of actors.
- Every scandal **impacts citizen's trust** !
- Need to **protect public institutions** from **undue influence, conflicts of interests & policy capture**
- **Mechanisms to hold decision-makers & lobbyists to account**



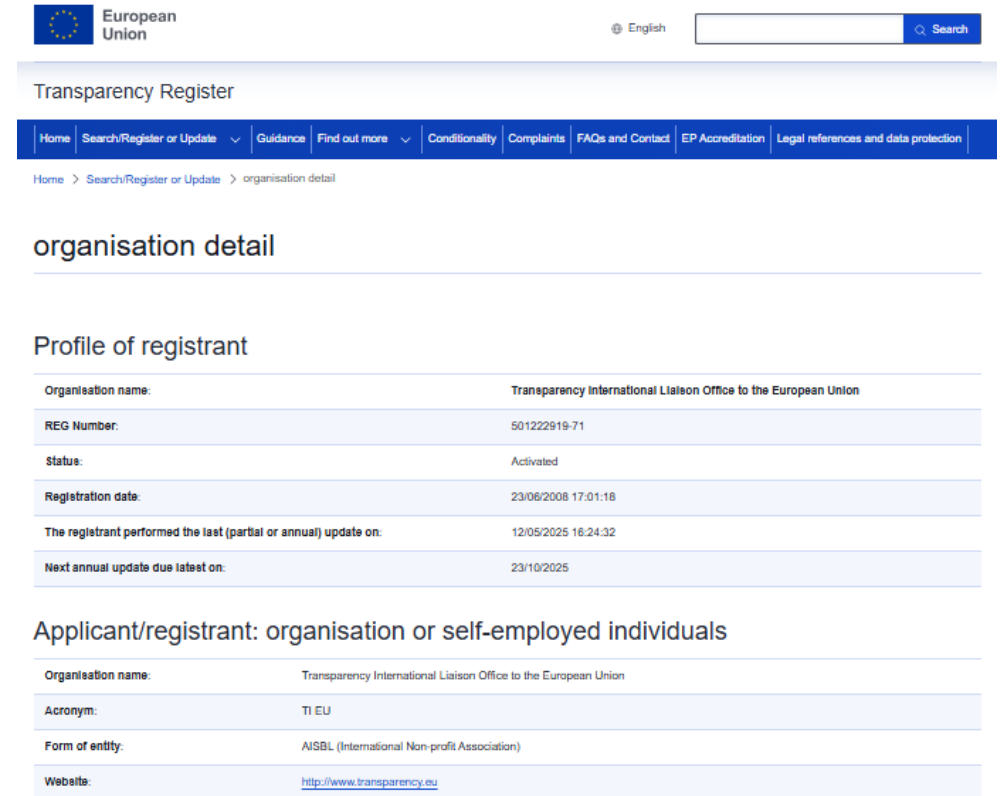
# BEST PRACTICES FOR THE REGULATION OF LOBBYING

- Definition of lobbying should cover **all organisations** involved in targeting public decision-making both **direct and indirectly**.
- Public register providing **key information** (identification, resources, interests pursued, targeted legislations, connected orgs, public funding received).
- **Enforceable** Code of Conduct to **prevent undue influence** and promotes **ethical lobbying**
- **Lobby footprint** for transparency and accountability of public decision-making (meetings, activities)



# THE EU TRANSPARENCY REGISTER

- Transparency Register displays **key information** > **14k lobbyists** in Brussels
- Definition encompasses all **actors involved** in influencing EU decision-making, both through **direct and indirect means**.
- **Code of Conduct** for lobbyists banning unethical practices
- **Regulatory challenge:** each institutions defines its **own engagement** with the EUTR & its **own ethics rules** in relation to lobbyists
- **Enforcement challenge:** only 10 FTE's dedicated to verify compliance & data-accuracy



The screenshot displays the European Union Transparency Register website. At the top, there is a header with the European Union flag and logo, a language selector set to 'English', and a search bar. Below the header, the 'Transparency Register' title is followed by a navigation menu with links: Home, Search/Register or Update, Guidance, Find out more, Conditionality, Complaints, FAQs and Contact, EP Accreditation, and Legal references and data protection. A breadcrumb trail shows the path: Home > Search/Register or Update > organisation detail.

The main content area is titled 'organisation detail'. Underneath, there is a section 'Profile of registrant' which contains a table with the following information:

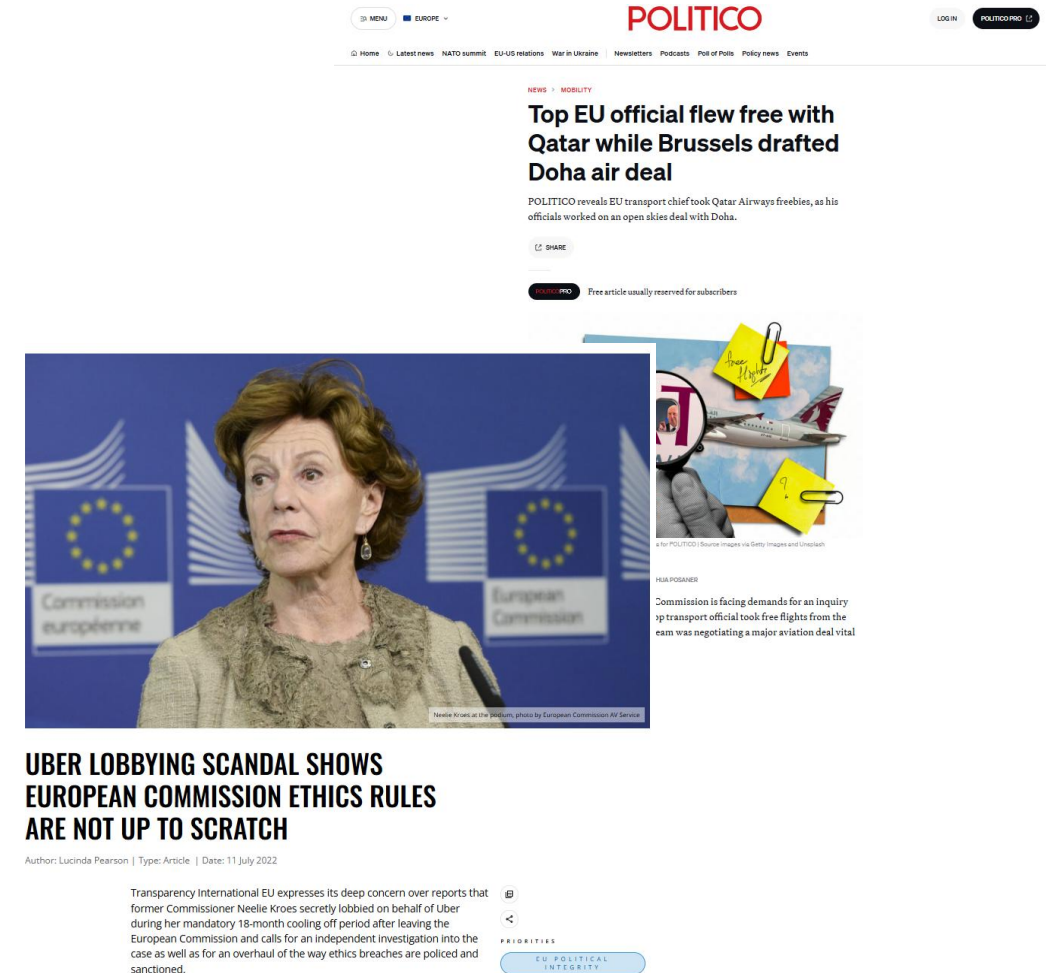
Organisation name:	Transparency International Liaison Office to the European Union
REG Number:	501222919-71
Status:	Activated
Registration date:	23/06/2008 17:01:16
The registrant performed the last (partial or annual) update on:	12/05/2025 16:24:32
Next annual update due latest on:	23/10/2025

Below the table, it states 'Applicant/registrant: organisation or self-employed individuals'. Another table provides further details about the organisation:

Organisation name:	Transparency International Liaison Office to the European Union
Acronym:	TI EU
Form of entity:	AISBL (International Non-profit Association)
Website:	<a href="http://www.transparency.eu">http://www.transparency.eu</a>

# THE EUROPEAN COMMISSION: LEADING BY EXAMPLE?

- The **European Commission** applies a strict conditionality principle: **no registration = no meeting** !
- Applies to Commissioners, Cabinet-Members, Director Generals since 2014 & managerial staff since December 2024
- All covered officials must publish **their meetings + minutes**
- **>9k meetings published** under VDL II (**26k under VDL I**)
- Only 16% meetings with Civil Society Organisations → **severe imbalance of access** !
- Strict obligations for staff & Commissioners **BUT** lax enforcement of post-employment rules





# A EUROPEAN PARLIAMENT OF ETHICS LOOPHOLES

- The **European Parliament** applies a narrow conditionality principle: **no registration = no participation in public hearing or on premises events**
- Registration is **not mandatory** to meet MEPs **BUT** registration encouraged with access badge to the EP
- All **MEPs and their assistants** must publish their meetings (**post-Qatargate reform**)
- **>30k meetings published** since the start of the new legislature (only 67k for the previous one)
- Permissive ethics rules defined in **Code of Conduct**:
  1. Gifts >150€, third-party travel & Col's are self-declared
  2. Paid in office employment allowed if declared, **including with TR registered organisations**
  3. A ban on “paid lobbying activities” but no definition for enforcement
  4. 6-month post-employment rules requiring prior notification
  5. Only EP President can apply sanctions
- Increasing **scrutiny** by Belgian authorities under national anti-bribery laws!



## NEW PARLIAMENT, OLD HABITS: AN ANALYSIS OF ALL MEP SIDE JOBS

Author: Kees de Guchteneire | Type: Policy Note | Date: 12 December 2024

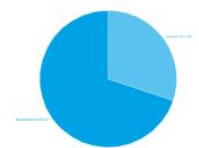
The newly elected European Parliament could have been a clean slate. After all, it was asked by probably the largest corruption scandal it had ever seen in 2012, and it **completely** **reformed** its internal ethics rules as a result. But it left perhaps the most glaring issue of parliamentary ethics—the provision and management of conflicts of interest—largely unaddressed. In fact, conflicts of interest relating to side jobs are, strictly speaking, permitted, as long as MEPs are transparent about them.

MEPs therefore had the chance to start anew. They had the chance to signal they took their newly gained electoral mandates seriously by refusing to engage in jobs on the side. We analysed their declarations of private interests to find out whether MEPs had taken this opportunity. These declarations are featured on our updated  [Integrity Watch EU database](#).

### Our key findings:

Instead, we found that MEPs have declared more side activities this time around than they had at the end of the previous mandate. In fact, **94% of MEPs—or three in four—have some sort of side activity**, as our latest research into the new European Parliament can reveal. Close to a third of MEPs have declared at least one income-generating activity, collectively estimated at an annual income of **6.3 million euros**. As a reminder, MEPs earn around **100,000 euros per year as their salary**. They face no limitations on side income amounts, as long as they are transparent about them.

### MEPs WITH INCOME HAVE DECLARED 6.3 MILLION EUROS



They do however face one theoretical limitation on the types of side jobs they can perform, as they cannot “engage in paid lobbying activities directly linked to the EU decision-making process”. This is a rather fuzzy constraint. The types of activities that might fall under this stipulation aren’t officially listed anywhere. In fact, our analysis found that 750 activities are with entries registered on the EU’s own transparency register. That’s 750 side activities with organisations that are actively involved in lobbying to change EU rules. While the exact nature of the activity must be considered, a registered activity always warrants further scrutiny.

## Lobbying scandal related to Huawei: What we know so far



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By Vincenzo Genovese

Published on 21/05/2025 - 13:08 GMT+2 • Updated 22/05/2025 - 18:13 GMT+2

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**Belgian Prosecutors are investigating a corruption case involving the European Parliament and the Chinese tech company**

A major corruption investigation shook the European Parliament in March, focused on allegations that Chinese tech giant Huawei engaged in illicit lobbying practices to sway



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Author: Kees de Graaf, Transparency International EU | Type: Publication | Date: 12 December 2024

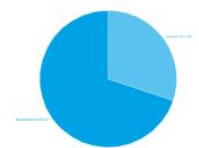
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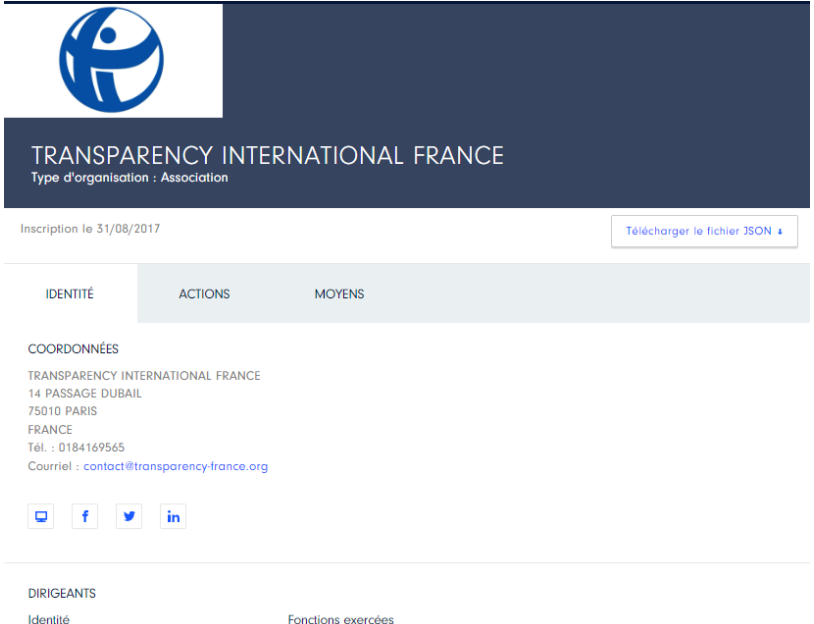
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# A MAZE OF RULES FOR THE COUNCIL OF THE EU

- Council of the EU is **officially** signatory to the EU Transparency Register but **covers only general-secretariat**
- Only 14 Permanent representation apply some form of conditionality & transparency
- National officials must follow national ethics rules !
- National lobbying can be highlight effective BUT:
  1. Only **Finland, France, Germany, Lithuania, Ireland** have fully-fledged lobbying regulations which can cover **EU lobbying**
  2. 14 EU Member States have **incomplete framework**. Key issue of **definition** and / or **enforcement**
  3. 8 EUMS have either **voluntary requirements, no regulation** or currently **adopting / reforming rules** (incl. **Czechia & Spain**)



The screenshot shows the profile page of Transparency International France on the EU Transparency Register. At the top, there is a logo of a stylized person inside a circle. Below it, the text reads "TRANSPARENCY INTERNATIONAL FRANCE" and "Type d'organisation : Association". To the right, there is a button that says "Télécharger le fichier JSON". Below this, there is a section for "COORDONNÉES" (Coordinates) with the following information: "TRANSPARENCY INTERNATIONAL FRANCE", "14 PASSAGE DUBAIL", "75010 PARIS", "FRANCE", "Tél. : 0184169565", and "Courriel : contact@transparency-france.org". There are also social media icons for Facebook, Twitter, and LinkedIn. At the bottom, there is a section for "DIRIGEANTS" (Directors) with a table that has two columns: "Identité" and "Fonctions exercées".

# ETHICAL LOBBYING THE EU INSTITUTIONS

- **Don't be** the next “**xxxx-gate**” 😊 Permissive rules can lead to a PR disaster, access ban or BE authorities' action!
- **Register** on the EU Transparency Register before any **direct or indirect action**
- Do stick to the EUTR Code of **Conduct guiding principles**:
  1. in their relations with any EU institution always **identify themselves** by name and registration number and state which organisation(s) they work for or represent.
  2. not **damage the reputation** of the register or cause any harm to the EU institutions
  3. **follow the relevant rules**, codes and guidelines established by the EU institutions
  4. not **induce** MEPs, Commissioners or EU staff to **contravene the rules** and standards of behaviour applicable to them
  5. if employing former MEPs, Commissioners or EU staff, follow the confidentiality requirements and rules they are bound by after leaving their institution, to prevent conflicts of interest

# THE DO's & DON'T'S OF LOBBYING THE EU INSTITUTIONS

- **Concretely:**

1. **Avoid gifts & paid for travel altogether** → unnecessary to achieve lobbying aims
2. **Do not employ a sitting MEP** → will be politicised by other groups & stakeholders
3. Always be clear about **who you represent** and **what your objectives are** → no astro-turfing
4. Use **scheduled meetings to push amendments** → whatsapp for process coordination

- **Some pro-tips:**

- Mass-mailing and twitter storms are **highly ineffective** → EU officials love public events and panels
- EU officials, incl. MEP are understaffed → Use short briefs, pre-drafted amendments and clear justification
- Engage in Commission pre-proposal **public consultations** → very effective in influencing first draft
- Spend your resources wisely → **EC & EP far more accessible** than Permanent Representations

# Thank you !

Integritywatch.eu

**Transparency International EU**

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