

TRANSPARENCY IN EUROPEAN PUBLIC AFFAIRS

EU TRANSPARENCY REGISTER

Óscar NAVARRO, DG Presidency, European Parliament

Irma KRUŠINSKAITĖ, General Secretariat, Council of the
European Union

Marie THIEL, Secretariat-General, European Commission

PUBLIC AFFAIRS COUNCIL - 19 NOVEMBER 2025



CONTENT

1. **Context:** EU transparency policy – legal basis
2. **Evolution:** How the Transparency Register has evolved
3. **Key features of the IIA:** Transparency of lobbying activities towards the EU
4. **Conditionality principle:** Application in the signatory institutions
5. **Transparency Register:** A growing database & monitoring of its content
6. **Q&A:** your questions are very welcome!



1. LEGAL BASIS

Article 11(1) and (2) TEU

'1. The institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action.

2. The institutions shall **maintain an open, transparent and regular dialogue with representative associations and civil society.**



Article 15(1) TFEU

'In order to promote good governance and ensure the participation of civil society, the Union's institutions, bodies, offices and agencies **shall conduct their work as openly as possible.**



LEGAL BASIS OF THE IIA

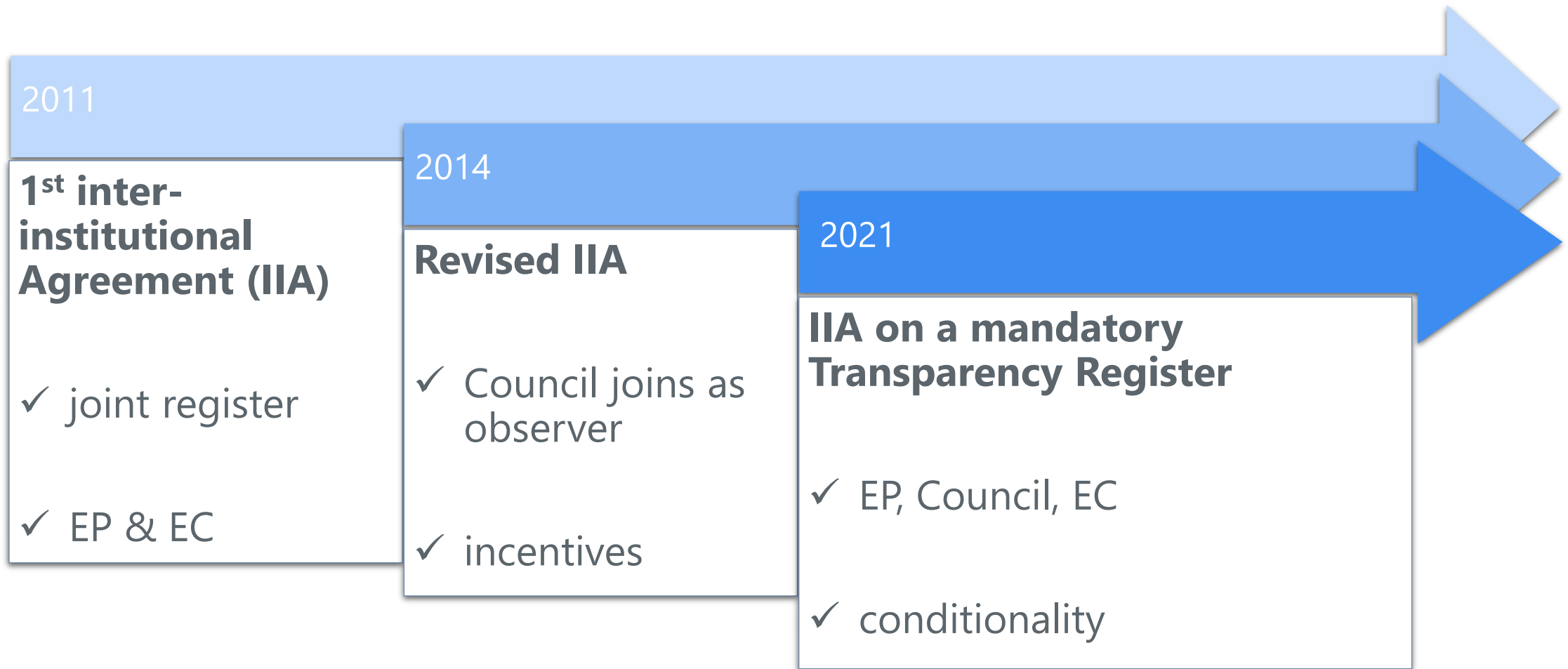
Article 295 TFEU

‘The European Parliament, the Council and the Commission shall consult each other and **by common agreement make arrangements for their cooperation.**

To that end, they may, in compliance with the Treaties, conclude interinstitutional agreements which may be of a **binding** nature.’ → **Interinstitutional Agreement**



2. EVOLUTION



THREE INSTITUTIONS – ONE REGISTER



The IIA on a mandatory transparency register of the European Parliament, the Council of the European Union and the European Commission is in force since **1 July 2021**.



3. 2021 IIA KEY FEATURES

- **Tripartite register:**
 - Council joins
 - Institutions commit to internal measures to promote ethical and transparent interest representation
 - Co-financing
- **Register becomes mandatory:** introduction of conditionality principle
- Broadened and clearer **scope of lobbying**
- **Two-layer governance**
- Simplified and improved administrative procedures
- Open to the participation of other institutional actors at Union level
- Stronger annual reporting & political review



GOVERNANCE

Management Board (Article 7)

- consists of SGs of three institutions
- oversees the implementation of IIA
- sets annual priorities and budget estimates
- takes decisions on requests of review of measures
- decides by consensus

Secretariat (Article 8)

- made up of HoUs and relevant staff
- manages daily operations of the TR
- establishes guidelines for registrants and provides helpdesk support
- carries out investigations and applies measures
- decides by consensus



GOVERNANCE

Proactive publication of governance documents

- Agendas & minutes of Management Board meetings
- Annual priorities
- Budget

Management board

The management board oversees the overall implementation of the Transparency register.

It is responsible for:

- identifying new requirements
- setting priorities
- adopts the [annual report](#) on the register's performance
- supervising the secretariat's work.

Following an investigation, registrants can ask the management board to review measures taken by the secretariat. Moreover, EU institutions and EU countries may notify the management board of [conditions on contacts with them or complementary transparency measures](#) that they introduce and ask for them to be published on this website.

The management board is made up of the Secretaries-General of the Parliament, the Council and the Commission. They meet at least once a year, and each Secretary-General holds the chair for 1 year.

- The Council held the chair in 2023
- The Commission held the chair in 2024
- The Parliament holds the chair in 2025

Documents:

Meeting of 21 May 2025	+
Meeting of 19 April 2024	+
Meeting of 31 March 2023	+
Meeting of 12 July 2022	+
Meeting of 24 September 2021	+



WHAT IS INTEREST REPRESENTATION (lobbying)?

Article 3 IIA

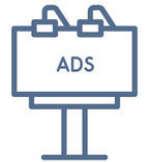
Any activity carried out

(by interest representatives)

**with the objective of
influencing**

the formulation or implementation of
policy or legislation

or the decision-making processes of the
EU institutions.



...AND WHAT IS **NOT**? Article 4(1) IIA

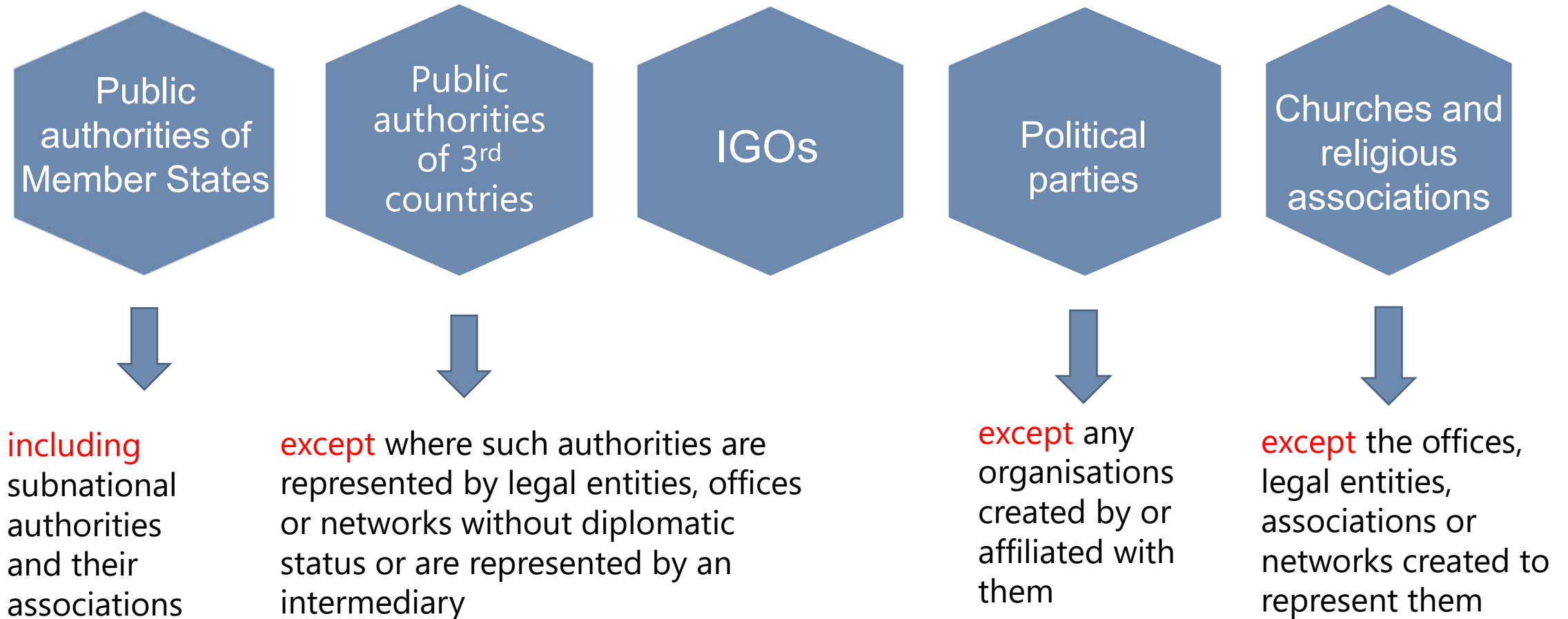


- ✓ representing clients in **legal proceedings**
- ✓ advising members/clients on **compliance**
- ✓ submissions based on **EU legal or administrative procedures/contracts/grants**
- ✓ participating in **social dialogue** (Article 152 TFEU)
- ✓ responding to direct and specific **requests for factual information/data/expertise**
- ✓ talking to MEPs as an **individual citizen**
- ✓ **spontaneous encounters**



THE ACTIVITIES OF WHICH BODIES ARE **NOT** COVERED?

Article 4(2) IIA



4. CONDITIONALITY PRINCIPLE

The principle whereby **registration is a necessary precondition** for interest representatives to be able **to carry out certain covered activities**
(Articles 5 and 1(2) IIA)

Registration is voluntary

Each institution adopts its
**own conditionality
measures**

Registration becomes
mandatory for key lobbying
activities



4. CONDITIONALITY PRINCIPLE

The signatory institutions adopt:

- **conditionality measures** by which they make certain interest representation activities conditional upon prior registration
- **complementary transparency measures** to further encourage registration and strengthen the joint framework

All conditionality & complementary transparency measures are [published](#) on the Transparency Register website.

Other **Union institutions, bodies, offices and agencies** as well as the **Member States in relation to their EU PermReps** may decide to adopt such measures and request their publication.



MEASURES IN PLACE - COMMISSION

Commission **decision-makers** and their **closest advisers** (*) shall:

- **meet only registered interest representatives** (Article 7 of the [Code of conduct for the Members of the Commission](#) & Article 4 of the Commission Decision (EU) [2024/3082](#))
- **publish information on their meetings** with interest representatives & publish **minutes** of such meetings within 2 weeks (relevant provisions are set out in Commission Decisions (EU) [2024/3081](#) and [2024/3082](#))

(*) Members of the Commission, members of Cabinets & **any** Commission staff holding management functions

Strong recommendation to **staff** to check TR credentials of stakeholders



MEASURES IN PLACE - COMMISSION

- Registration is **mandatory** for appointment of Type B and C members in **Commission expert groups** (Commission Decision [C\(2016\)3301](#) on expert groups)
- Notifications about **public consultations** and **roadmaps** in specified fields of interest/ policy areas (Better Regulation Guidelines of the Commission, [Guidelines on stakeholder consultation](#))

Registrations provide information on all such **activities, participations**, etc.



MEASURES IN PLACE - COMMISSION

Profile of registrant

Organisation name:	Google
REG Number:	03181945560-59
Status:	Activated
Registration date:	29/03/2011 16:15:17
The registrant performed the last (partial or annual) update on:	22/10/2025 12:59:28
Next annual update due latest on:	17/03/2026



Example from the Transparency Register



Last update: 10-11-2025

List of meetings "Google" has held with Members of the Commission, members of their Cabinet or Directors-General (since 1/12/2014) as well as all Commission staff holding management functions (since 1/1/2025) under its current ID number in the Transparency Register: "03181945560-59".

Nr	Commission representative(s)	Date	Location	Subject(s)
1	Kilian Gross, Head of Unit, Communications Networks, Content and Technology	21/10/2025	Hybrid (Brussels and Videoconference)	Code of Practice on Transparency of AI-Generated Content
2	Thibaut Kleiner, Director, Communications Networks, Content and Technology Manuel Mateo Goyet, Acting Head of Unit, Communications Networks, Content and Technology	16/10/2025	Brussels L-51	State of cloud market and European cloud policies

MEASURES IN PLACE – COUNCIL

Under [Council Decision \(EU\) 2021/929](#), registration is **mandatory** for interest representatives in order to:

- attend meetings with the Secretary-General and Directors General
- participate in thematic briefings
- participate as speakers in public events

Members of staff to carefully consider appropriateness of meeting non-registered interest representatives and consult line management.



MEASURES IN PLACE – PARLIAMENT

Registration is **mandatory** for interest representatives in order to:

- **Access** to Parliament for to EP for their individual representatives (Rule 126 of [Parliament's Rules of Procedure](#)): There are 6000 -7000 access passes issued a year
- **Participate** as speakers or co-organisers in public hearings and events held on Parliament premises ([Decision of the Bureau of 12 June 2023](#))
- **Participate** in MEP Intergroups and unofficial groupings ([Rule 35 and 36 of Parliament's Rules of Procedure](#))
- **Meet managers** (Heads of Unit – Secretary-General) ([Decision of the Bureau of 10 May 2025](#))

MEPs are recommended to only meet registered interest representatives and must publish information about such scheduled meetings related to Parliamentary business ([MEP code of conduct](#))



MEASURES IN PLACE – PARLIAMENT

TR and EP transparency tools are connected:

- shows MEP meeting declarations
- current MEP intergroups
- names of interest representatives with EP lobbyist badge

European Parliament

Search

Your results
Showing 10 of 231 results

CSV Export results

Under Article 7 of the Code of Conduct for Members of the European Parliament regarding integrity and transparency, Members must publish online all meetings relating to parliamentary business which are scheduled either with interest representatives or with diplomats and representatives of third countries. This obligation was first created in July 2019 and was extended to its current scope in November 2023. The meetings declared can be found on each Member's profile page on the European Parliament website, and in each parliamentary procedure's entry on the Legislative Observatory. The President's meeting agenda can be found [here](#). You can also search the entire database of declared meetings using the search form, and extract the information in your preferred format.

Report on Copyright and Generative Artificial Intelligence

Member NIEBLER Angelika
Date, Place: 16-10-2025 - Brussels
Capacity: Member - Staff meeting
Meeting related to procedure: 2025/2058(INI)
Meeting with: [Google](#)

Debating Europe Panel: "EU Digital Decade"

Member NEGRESCU Victor
Date, Place: 15-10-2025 - Brussels
Capacity: Member
Meeting with: [Friends of Europe - Google](#)

legislation on online content and safety, in particular on online child safety

Member ARIAS ECHEVERRÍA Pablo
Date, Place: 02-10-2025 - Bruxelles
Capacity: Member - Staff meeting
Code of associated committee or delegation: [IMCO](#)
Meeting with: [Google](#)

Google

REG Number 03181945560-59

X Google (231)

Members

Select

Organisations on Transparency Register

Google (231)

Organisations (open search)

Select

Parliamentary procedure number

Select

Member capacity

Select

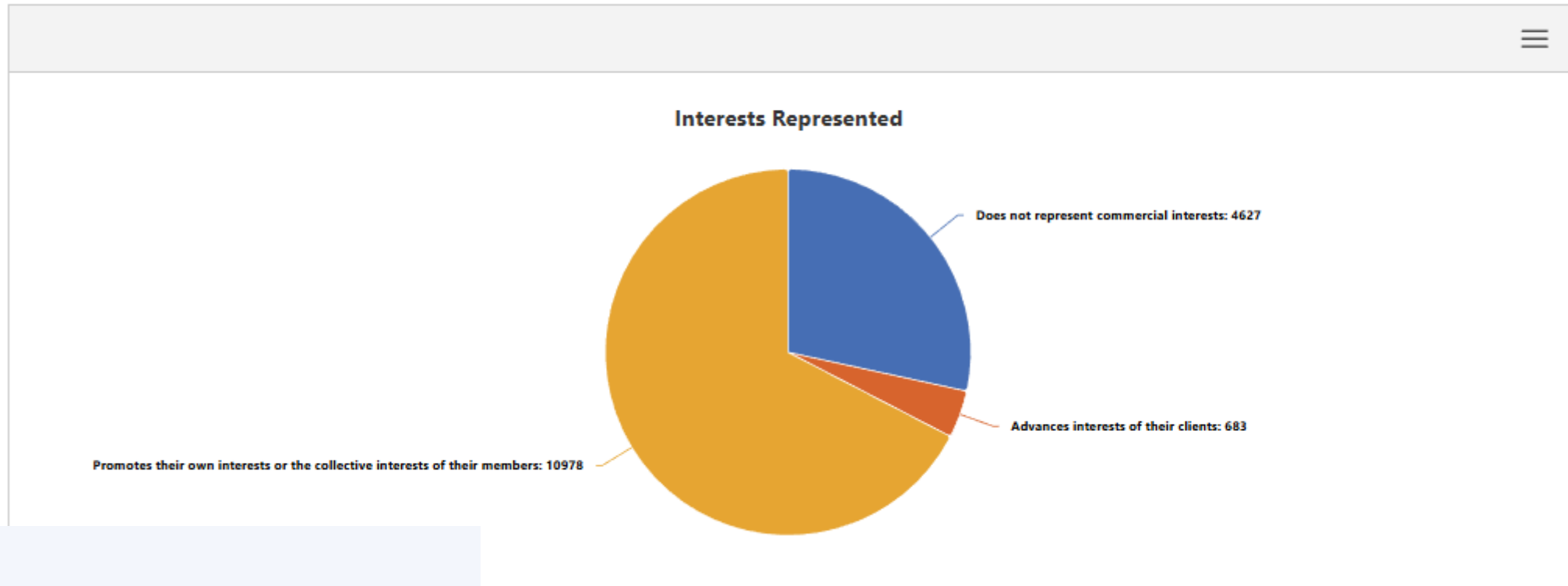
Code of associated committee or delegation

Select

Location

5. Transparency Register

Interests represented



16288

Number of organisations

This is the number of organisations in the Transparency Register



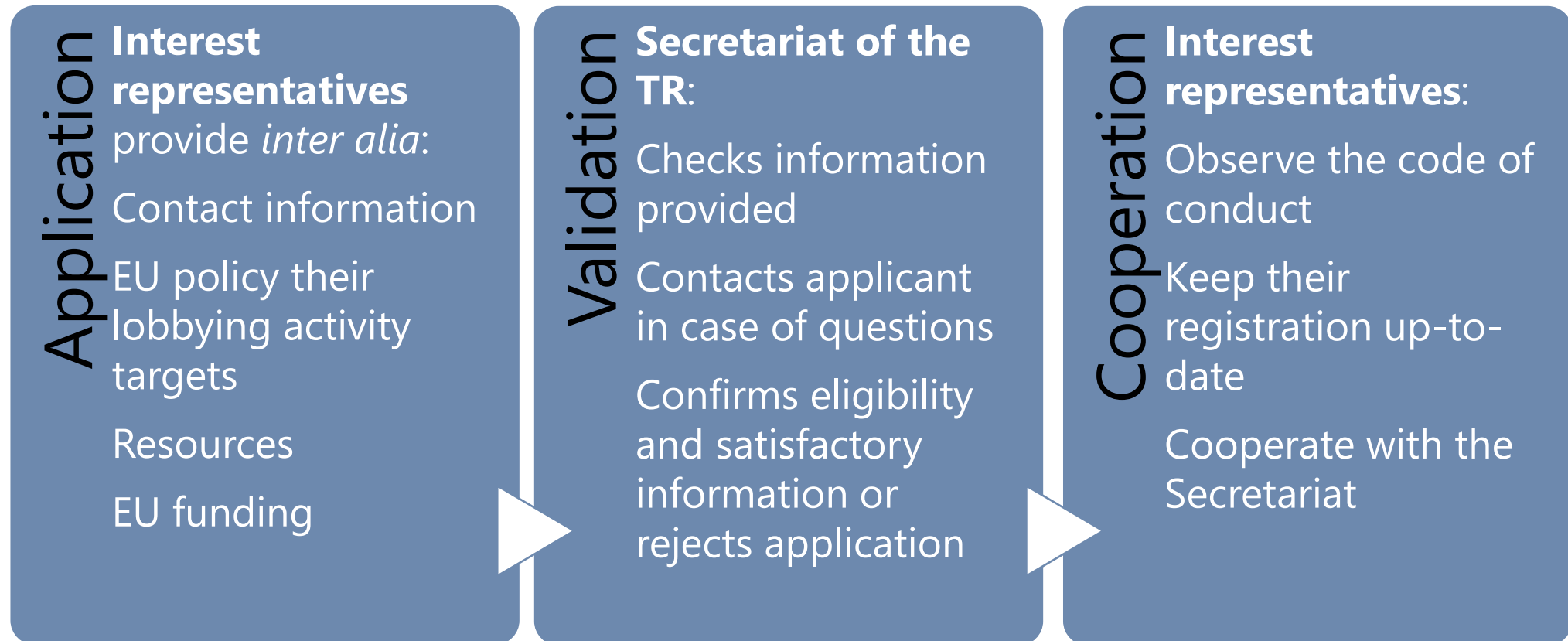
FINANCIAL INFORMATION

- **Those promoting their own interests or those of their members** (e.g. companies and groups, trade and business associations) **disclose lobbying costs, incl. for hiring intermediaries**
- **Those that advance the interests of their clients** (e.g. law firms or public affairs consultancies) **disclose client revenue per client, incl. 3rd country government bodies**
- **Those not representing commercial interests** (e.g. civil society organisations, NGOs, charities, foundations, academic and research institutions, organisations representing churches etc.) **need to disclose total budget and sources of funding**

Annex II to IIA



APPLICANTS / REGISTRANTS



MONITORING OF DATA QUALITY

Quality checks are performed to monitor quality of registrants' information

Ensuring the best possible quality of data is one of the main tasks of the Secretariat:

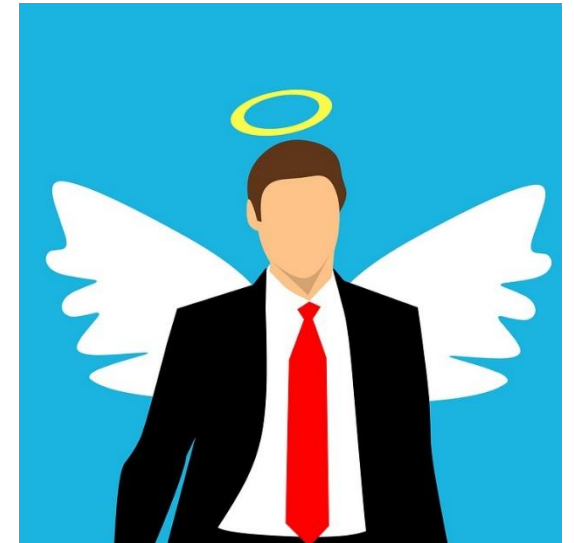
- In the context of its monitoring activities in **2024**, the Secretariat checked 3 536 new applications and 4 441 existing registrations.
- In **2025**, the Secretariat has already performed over 6 000 checks of new applications and over 1 800 checks on existing registrants.



CODE OF CONDUCT

In their relations with Union institutions interest representatives shall:

- **identify themselves** by name, registration number and by the entity/-ies they work for or represent
- ensure their registration is **accurate**
- **comply with** the publicly available **rules, codes and guidelines** of the institutions, including on **access** and **security**
- not try to obtain information or decisions through **improper behaviour**
- **not induce members or staff of the Union institutions to contravene the rules** and standards of behaviour applicable to them
- **not abuse their registration** for commercial gain or distort or misrepresent the effect of registration
- Inform their clients, employees or members of these rules



Annex I to IIA



INVESTIGATIONS

- **Observance of the code of conduct** is part of the **eligibility** of applicants / registrants
- Own-initiative investigations or pursuant to **complaints** alleging non-observance
- Secretariat can **remove registrations** and further apply **measures** if ineligibility is due to non-observance
- Clear **remedies** for registrants:
 - Right of review of measures by the Management Board
 - Appeal of the Management Board decision to the CJEU/ complaint to the European Ombudsman

Article 6 & Annex III to IIA



MORE INFORMATION

[Website of the Transparency Register](#)

[Interinstitutional agreement](#) and [political statement](#)

[Annual reports on the functioning of the Transparency Register](#)

You can reach the Secretariat at:

[FAQs and Contact us](#)

