



Secretariat of the Transparency Register

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Dear Ms CANN and Ms KATZEMICH,

I would like to thank you for your letter of 19 September 2022, by which you complained to the European Commission, the European Parliament and the Council of the European Union about several alleged instances of implausible data in the EU Transparency Register. Vice-President Jourová has asked me to reply to your letter on behalf of the Commission, also in my capacity as the Coordinator of the interinstitutional Secretariat of the Transparency Register.

The Interinstitutional Agreement on the mandatory Transparency Register¹ (hereinafter 'the IIA') entered into force on 1 July 2021. Registrants who were entered in the register before the date of entry into force of the IIA were granted a transition period to amend their registration to satisfy the new information requirements resulting from the IIA in order to remain on the register. That transition period ended on 30 April 2022 with more than 11 000 registrants migrating to the mandatory register. The Secretariat published new detailed guidance on the Transparency Register website and provided helpdesk assistance to support registrants throughout this process.

Following the end of the transition period and according to the annual priorities for the register in 2022 and 2023², the Secretariat is in the process of monitoring the content of

¹ Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register, OJ 207, 11.6.2021, p.1.

² The annual priorities for the register are determined by the Management Board of the Transparency Register. They are publicly available on the governance [subpage](#) of the Transparency Register [website](#).

the entire register with the aim of achieving an optimal level of data quality therein. These quality controls include the screening of all new applications for registration, which are activated on the register only once the applicant's eligibility is established and the registration is considered to satisfy the applicable information requirements, as well as existing registrations which were amended during the transition period.

Since the beginning of 2022 the Secretariat has already checked 3 100 registrations and will step up this process in the next months. For the registrations amended during the transition period based on the new information requirements and registration form, the Secretariat takes the view that possible information implausibility cases may not be considered as giving rise to a non-observance of point (f) of the register's code of conduct until the Secretariat has performed an initial quality check on the registrations concerned.

In your letter, you submit allegations regarding various cases of implausible or missing information in the new register. Please be informed that all the cases you have identified in the lists attached to your letter refer indeed to amended registrations submitted during the transition period. I would like to thank you for your effort in compiling that information, which the Secretariat will examine as a matter of priority. The Secretariat will contact the registrants concerned in the context of its ongoing monitoring exercise and will duly inform you about the outcome.

The Secretariat is fully aware that the most common possible implausibility issues in the new mandatory register appear to concern the new financial information required and the corresponding categorisation of registrants according to the type of interests represented (part III of Annex II to the IIA). This has led the Secretariat to adapt its communication with registrants and to review its available IT software tools in order to address these issues.

I would like to emphasise that, in accordance with the IIA, the Secretariat shall monitor the content of the register, with the aim of achieving an optimal level of data quality in the register, on the understanding, however, that registrants are ultimately responsible for the accuracy of the information they have provided.

Let me take this opportunity to thank again Corporate Europe Observatory and LobbyControl for their constructive submissions as well as for your genuine interest in the Transparency Register and for using it as a key reference tool to support your lobby monitoring activities.

Yours sincerely,

María OLIVÁN-AVILÉS
Coordinator of the Secretariat of the
Transparency Register