Dear Ms CANN and Ms KATZEMICH,

I am writing to inform you of the follow up provided to 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 or missing information in the EU Transparency Register.

As explained in my letter of 5 October 2022 on the matter\(^1\), the Transparency Register Secretariat is responsible for the monitoring of the content of the register. The Secretariat checks on a daily basis each new application for registration received in order to determine eligibility for registration and resolve any data quality issues prior to activation on the register. The Secretariat is also undertaking a massive exercise to monitor the content of all entries from registrants that have transitioned to the new register from the previous database (i.e., that were registered prior to September 2021). Registrants who did not transition to the new registration form were removed from the Transparency Register.

In your letter, you outlined 431 specific entries which contained issues of either “inflated” lobby expenditure, or “wrong categorisation” of interests represented. All the entries concerned were registered prior to September 2021, but their new declaration had not yet

\(^1\) Ref. Ares(2022)6879752 – 05/10/2022
received a quality check by the Secretariat. We have now been able to check each of these entries for the issues highlighted or any other inconsistencies.

The first issue highlighted related to possible cases of “inflated” lobby expenditure, where you provided a list of 51 entries, i.e., the biggest spenders contained in the register. All cases have been checked and as a follow-up to our quality checks, we can inform you that of these 51 cases: 7 entries were deemed correct, 26 entries have provided a satisfactory update following the quality check performed by the Secretariat and 18 entries were removed for not providing the update requested, within the deadline provided. We would highlight that there were indeed a number of entities (such as universities) that had misunderstood the cost declaration required as being for only relevant activities.

The second issue highlighted concerned 380 entries, which you reported as declaring the “wrong categorisation” of interests represented, i.e., declaring to be non-commercial, which was inconsistent with the nature of their set-up or activities. All cases have been checked and as a follow up to our quality checks, we can inform you that of these 380 cases: 5 entries were deemed correct, 229 entries have provided a satisfactory update following the quality check performed by the Secretariat and 146 entries were removed for not providing the update requested, within the deadline provided.

The overall result shows the importance of this monitoring exercise, since only 3% were correct from the outset and, whilst in 59% of total cases the registrant provided a satisfactory update, 38% were removed from the register. Please note that the completion of that exercise may have taken somewhat longer than initially foreseen, in view of the introduction of EU Login, which has necessitated more outreach and help-desking than is usual for registrants concerned by our updating procedures.

I would like to thank you for contacting the Secretariat on matters of data quality, which we consider an absolute priority for the Transparency Register.

Yours sincerely,

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