

Establishing harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries

2023/0463(COD) - 24/10/2025 - Committee report tabled for plenary, 1st reading/single reading

The Committee on the Internal Market and Consumer Protection adopted the report by Adina VLEAN (EPP, RO) on the proposal for a directive of the European Parliament and of the Council establishing harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries and amending Directive (EU) 2019/1937.

The committee responsible recommended that the European Parliament's position adopted at first reading under the ordinary legislative procedure should amend the proposal as follows:

Subject matter and objectives

Members proposed that this Directive should lay down harmonised requirements in relation to interest representation activities of an economic nature carried out on behalf of a third country sponsor, with a view to influencing the development, formulation and implementation of policies, law or public decision-making processes in the Union. Its objectives are to improve the functioning of the internal market for interest representation activities and to achieve that in respect of those activities a common level of transparency and democratic accountability across the Union without creating a climate of distrust liable to deter natural or legal persons from Member States or third countries from engaging with or providing financial support to entities carrying out interest representation activities on behalf of a third country sponsor. Member States shall ensure that compliance with this Directive does not lead to any restriction of fundamental rights.

Definitions

To harmonise minimum transparency requirements and ensure their correct application, Members considered it is necessary to provide for a common and exhaustive definition of interest representation. They suggested that the definition should be designed to ensure that only relevant activities - those involving the provision of information, knowledge, or expertise with the aim of influencing policy, legislative, or public decision-making - fall within its scope.

Moreover, it clarified certain terms such as:

- ‘interest representation activity’ to mean an activity conducted with the objective of influencing the development, formulation or implementation of policies, law, or public decision-making processes, in the Union through, inter alia: organising communication or advertising campaigns, including on digital platforms or via social media; or
- ‘third country sponsor’ to mean a public or private entity whose actions can be attributed to a sponsor, taking into account all relevant circumstances, such as the ability of the sponsor to exercise decisive influence or ultimate control over the entity.

Central public access portal

The amended text introduces a central access point for national transparency registers, facilitating public access to relevant information while avoiding duplicative administrative procedures. The central public access portal should be established by the Commission as a decentralised system for the interconnection of the national registers. The system should include a web portal that serves as a central public electronic access point to the information in the system.

Registration

Member States should ensure that the authority responsible for a national register from which an entity has been removed keeps the information about the entity for **four years** after that entity has been removed from the register.

Registration procedure

Once an entry is included in the national register, the registered entity should without undue delay and at the latest within **five working days** receive a confirmation of registration from the authority responsible for the national register. The registered entity should be issued with a unique European Interest Representation Number EIRN, and a digital copy of the information included in the national register.

Exemption from the obligation to publish information

According to the report, Member States should ensure that the decision to grant an exemption from the requirement to publish the information, or to limit public access, partially or fully, may be taken ex officio by the competent supervisory authority, or, where applicable, at the request of a supervisory authority of another Member State, where it has reason to believe that there is a risk that the publication might expose an individual to a violation of that individual's fundamental rights and that the partial or full limitation of public access may eliminate or reduce this risk.

Competent national authorities

Each Member State may appoint a single authority as the competent national authority responsible for the national registers and for performing the supervisory tasks pursuant to this Directive. Member States should ensure that the procedures for the appointment of the governing bodies of the supervisory authorities are transparent, non-discriminatory and guarantee the requisite degree of independence.

The staff of the supervisory authorities should be able to perform their duties independently, impartially, and transparently, free from any external influence, and must possess the necessary skills and expertise to carry out their tasks effectively.

Cross-border cooperation

Member States should ensure that supervisory authorities are competent to request certain information from the supervisory authorities of another Member State, where such information is necessary for the purpose of the cross-border cooperation.

Sanctions

The report allows Member States to determine appropriate sanctions, ensuring that penalties are proportionate to the severity of non-compliance while remaining dissuasive. The requirement for **prior warnings** before imposing sanctions ensures that entities have the opportunity to rectify compliance issues before facing penalties.

Moreover, in cases of a serious infringement or of repeated or recurrent infringements of national provisions, the report included a provision whereby Member States may decide to temporarily suspend or withdraw an entity's registration.