

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

2023/0463(COD) - 27/11/2025 - Text adopted by Parliament, partial vote at 1st reading/single reading

The European Parliament adopted by 392 votes to 88, with 133 abstentions, **amendments** to 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 issue was referred back to the committee responsible for interinstitutional negotiations.

## *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.

The objectives of this Directive 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 them with financial support.

## *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. ‘**Interest representation service**’ is defined as any activity undertaken with the aim of influencing the development, formulation, or implementation of policies, law or public decision-making processes in the Union through:

- organising or participating in meetings, conferences or events;
- contributing to or participating in consultations or parliamentary hearings;
- organising communication or advertising campaigns, including on digital platforms or via social media;  
or
- preparation of policy and position papers, legislative amendments, opinion polls, surveys or open letters;

**The ‘third country sponsor’** is defined as a public or private entity whose actions can be attributed to a sponsor referred to in point (a), taking into account all relevant circumstances, such as the ability of the sponsor to exercise decisive influence or ultimate control over the entity.

### *Level of harmonisation*

Member States should not maintain or introduce **less stringent** provisions than those provided for in this Directive. When transposing and implementing this Directive, Member States should ensure compliance with the **Charter of Fundamental Rights**, including the rights to freedom of expression and information, to freedom of assembly and association, to freedom of scientific research, including academic freedom, to the protection of personal data, to an effective remedy and to freedom to conduct a business.

### *Central public access portal*

Parliament called on the Commission to establish a central public access portal as a decentralised system for the interconnection of national registers. This system should include a web portal serving as a central public electronic access point to the information in the system. The web portal will offer a search service in all official EU languages to facilitate public access to information concerning registered entities.

### *Registration*

Member States must ensure that any relevant entity established in their territory registers in a national register no later than **before** commencing the interest representation activity. The authority responsible for a national register from which an entity has been removed must retain information relating to that entity for four years after its removal 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*

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*

The designated national authorities must be **independent** in the performance of their duties. The procedures for appointing the governing bodies of the supervisory authorities must be transparent and non-discriminatory and guarantee the required degree of independence.

### *Sanctions*

Amendments enable 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, Members included a provision whereby Member States may decide to temporarily suspend or withdraw an entity's registration.