















Basic information	
<p>2023/0463(COD)</p> <p>COD - Ordinary legislative procedure (ex-codecision procedure) Directive</p>	Awaiting Parliament's position in 1st reading
<p>Establishing harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries</p> <p>Amending Directive 2019/1937 2018/0106(COD)</p> <p>Subject</p> <p>1.20.05 Public access to information and documents, administrative practice 1.20.09 Protection of privacy and data protection 2.80 Cooperation between administrations 3.30.06 Information and communication technologies, digital technologies</p> <p>Legislative priorities</p> <p>Joint Declaration 2023-24</p>	

Key players			
European Parliament	Committee responsible	Rapporteur	Appointed
	 Internal Market and Consumer Protection	VĂLEAN Adina (EPP)	18/10/2024
	Former committee responsible	Former rapporteur	Appointed
	 Internal Market and Consumer Protection	ARIAS ECHEVERRÍA Pablo (EPP)	08/03/2024
	Committee for opinion	Rapporteur for opinion	Appointed
	 Foreign Affairs	The committee decided not to give an opinion.	
	 Legal Affairs	The committee decided not to give an opinion.	
	 Civil Liberties, Justice and Home Affairs	The committee decided not to give an opinion.	
	 Constitutional Affairs	GOZI Sandro (Renew)	02/10/2024

	Former committee for opinion	Former rapporteur for opinion	Appointed
	AFET Foreign Affairs	The committee decided not to give an opinion.	
	BUDG Budgets	The committee decided not to give an opinion.	
	CONT Budgetary Control	CHINNICI Caterina (EPP)	29/01/2024
	JURI Legal Affairs	LAVOCAT Guy (Renew)	07/03/2024
	LIBE Civil Liberties, Justice and Home Affairs	The committee decided not to give an opinion.	
	AFCO Constitutional Affairs		
Council of the European Union			
European Commission	Commission DG	Commissioner	
	Justice and Consumers	REYNDERS Didier	
European Economic and Social Committee			

Key events			
Date	Event	Reference	Summary
12/12/2023	Legislative proposal published	COM(2023)0637 	Summary
25/01/2024	Committee referral announced in Parliament, 1st reading		
13/11/2024	Resumption of business from the previous parliamentary term		
16/10/2025	Vote in committee, 1st reading		
24/10/2025	Committee report tabled for plenary, 1st reading	A10-0208/2025	Summary
26/11/2025	Debate in Parliament		
27/11/2025	Decision by Parliament, 1st reading	T10-0306/2025	Summary
27/11/2025	Results of vote in Parliament		
27/11/2025	Matter referred back to the committee responsible for interinstitutional negotiations		

Technical information	
Procedure reference	2023/0463(COD)
Procedure type	COD - Ordinary legislative procedure (ex-codecision procedure)
Procedure subtype	Legislation
Legislative instrument	Directive
Amendments and repeals	Amending Directive 2019/1937 2018/0106(COD)
Legal basis	Treaty on the Functioning of the European Union TFEU 114
Other legal basis	Rules of Procedure EP 165
Mandatory consultation of other institutions	European Economic and Social Committee
Stage reached in procedure	Awaiting Parliament's position in 1st reading
Committee dossier	IMCO/10/00320

Documentation gateway				
European Parliament				
Document type	Committee	Reference	Date	Summary
Committee draft report		PE770.287	19/03/2025	
Amendments tabled in committee		PE773.099	24/04/2025	
Committee opinion	AFCO	PE773.117	24/09/2025	
Committee report tabled for plenary, 1st reading/single reading		A10-0208/2025	24/10/2025	Summary
Text adopted by Parliament, partial vote at 1st reading /single reading		T10-0306/2025	27/11/2025	Summary
European Commission				
Document type	Reference	Date	Summary	
Legislative proposal	COM(2023)0637 	12/12/2023	Summary	
Document attached to the procedure	SEC(2023)0637 	13/12/2023		
Document attached to the procedure	SWD(2023)0660 	13/12/2023		
Document attached to the procedure	SWD(2023)0663 	13/12/2023		
Document attached to the procedure	SWD(2023)0664 	13/12/2023		
National parliaments				
Document type	Parliament /Chamber	Reference	Date	Summary

Contribution	CZ_SENATE	COM(2023)0637	18/03/2024	
Contribution	FR_SENATE	COM(2023)0637	19/03/2024	
Contribution	IT_CHAMBER	COM(2023)0637	20/03/2024	
Contribution	NL_SENATE	COM(2023)0637	21/03/2024	
Reasoned opinion	IE_CHAMBER	PE759.911	21/03/2024	
Contribution	IT_SENATE	COM(2023)0637	12/04/2024	
Reasoned opinion	HU_PARLIAMENT	PE761.174	10/07/2024	

Other institutions and bodies

Institution/body	Document type	Reference	Date	Summary
CofR	Committee of the Regions: opinion	CDR0087/2024	17/04/2024	
EESC	Economic and Social Committee: opinion, report	CES0092/2024	24/04/2024	

Additional information

Source	Document	Date
EP Research Service	Briefing	21/05/2024
European Commission	EUR-Lex	

Meetings with interest representatives published in line with the Rules of Procedure

Rapporteurs, Shadow Rapporteurs and Committee Chairs

Transparency				
Name	Role	Committee	Date	Interest representatives
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	23/10/2025	Civil Society Europe Transparency International Liaison Office to the European Union
GEESE Alexandra	Shadow rapporteur	IMCO	14/10/2025	LobbyControl
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	19/09/2025	Civil Society Europe Transparency International Liaison Office to the European Union
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	19/09/2025	European Commission
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	09/09/2025	European Commission
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	08/09/2025	Civil Society Europe Transparency International Liaison Office to the European Union
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	04/09/2025	European Commission

GEESE Alexandra	Shadow rapporteur	IMCO	23/07/2025	Civil Liberties Union for Europe
VĂLEAN Adina	Rapporteur	IMCO	16/07/2025	Transparency International Liaison Office to the European Union
VĂLEAN Adina	Rapporteur	IMCO	15/07/2025	Permanent Representation of France to the EU
VĂLEAN Adina	Rapporteur	IMCO	02/07/2025	Haute Autorité pour la transparence de la vie publique (France - public authority)
GEESE Alexandra	Shadow rapporteur	IMCO	02/07/2025	Transgender Europe
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	26/06/2025	European Commission
GEESE Alexandra	Shadow rapporteur	IMCO	18/06/2025	LobbyControl
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	18/06/2025	European Commission
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	05/06/2025	Transparency International Liaison Office to the European Union
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	05/06/2025	European Commission
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	19/05/2025	Civil Society Europe
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	14/05/2025	Transparency International Liaison Office to the European Union
GEESE Alexandra	Shadow rapporteur	IMCO	07/05/2025	Civil Society Europe European Civic Forum
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	22/04/2025	Transparency International Liaison Office to the European Union
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	01/04/2025	Civil Society Europe
VĂLEAN Adina	Rapporteur	IMCO	11/03/2025	Transparency International Liaison Office to the European Union
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	10/03/2025	Transparency International Liaison Office to the European Union
AGIUS SALIBA Alex	Shadow rapporteur	IMCO	21/01/2025	Commissioner Michael McGrath
GEESE Alexandra	Shadow rapporteur	IMCO	26/11/2024	European Partnership for Democracy
GEESE Alexandra	Shadow rapporteur	IMCO	16/04/2024	European Civic Forum Transparency International Liaison Office to the European Union
GEESE Alexandra	Shadow rapporteur	IMCO	16/04/2024	Civil Society Europe
BUDA Daniel	Shadow rapporteur for opinion	IMCO	04/04/2024	Civil Society Europe

Other Members

Transparency		
Name	Date	Interest representatives
TOOM Jana	24/11/2025	Transparency International Liaison Office to the European Union
NÍ MHURCHÚ Cynthia	03/06/2025	Civil Society Europe
HAHN Svenja	21/05/2025	Civil Society Europe

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

2023/0463(COD) - 12/12/2023 - Legislative proposal

PURPOSE: to introduce harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries.

PROPOSED ACT: Directive of the European Parliament and of the Council.

ROLE OF THE EUROPEAN PARLIAMENT: the European Parliament decides in accordance with the ordinary legislative procedure and on an equal footing with the Council.

BACKGROUND: the **provision of interest representation in the Union** is a growing and increasingly cross-border activity. Interest representation activities are regulated in different ways in the Member States. Interest representation is not only carried out on behalf of domestic stakeholders but increasingly also by third countries.

When presented transparently, ideas from third countries can contribute positively to public debate and are a welcome part of international engagement. However, when carried out covertly, interest representation on behalf of third countries is prone to being used as a channel for interference in Union democracies.

To the extent that it is normally provided against remuneration, interest representation, including interest representation provided to third countries, constitutes a service within the meaning of Article 57 of the Treaty on the Functioning of the European Union ('TFEU').

Member States' measures regulating transparency of interest representation activities are very divergent. Some Member States have established mandatory registers aiming, in particular, at ensuring transparency. Others have established voluntary registers, whereas some Member States have no registers for interest representation. There are also considerable variations regarding the granularity of the information provided for transparency purposes, including the type of information required, for instance about the interests represented or about the client. The legislative framework is therefore highly **fragmented** across the Union.

CONTENT: this proposed Directive lays down **harmonised requirements** in relation to economic activities of interest representation carried out on behalf of a third country entity, with a view to improving the functioning of the internal market by achieving a common level of transparency across the Union.

The purpose of this Directive is to achieve that transparency in such a manner as to avoid creating a climate of distrust apt 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 on behalf of a third country entity.

By providing for **full harmonisation**, the proposed Directive would provide for proportionate harmonised transparency requirements and a comprehensive system of safeguards, including effective judicial review, a harmonised sanction regime limited to administrative fines, independent supervisory authorities, obligations to prevent stigmatisation, and in particular the need to ensure that no adverse consequences arise from being subject to the transparency rules.

Transparency and registration obligations

The proposal provides for a possibility to **identify third country entities** on whose behalf interest representation service is carried out, a provision on subcontracting, an obligation to keep relevant records, and the obligation on entities not established in the Union to appoint a legal representative.

The proposal:

- provides for the setting up and maintaining of the national registers to be used for registrations under the Directive;
- sets out rules on registration, including the information to be provided. In this context, registered entities are to be provided a unique European Interest Representation Number ('EIRN') and the competent authorities in other Member States concerned are to be notified of the registration;
- establishes which parts of the information provided by registered entities are to be publicly available, as well as a mechanism allowing registered entities to request that all or part of the information provided is not made publicly available where there are overriding legitimate interests preventing publication;
- establishes a yearly publication of data by Member States and the Commission;
- establishes the obligation that registered entities as well as their subcontractors must provide their EIRN when in direct contact with public officials.

Supervision and enforcement rules

Member States should designate: (i) one or more authorities or bodies in charge of setting up and maintaining the national registers; (ii) one or more supervisory authorities.

Each supervisory authority will have access to the national registers under its responsibility for the purpose of supervising the compliance with and enforcing the obligations set out in this Directive as well as exchanging information with the supervisory authorities in other Member States and the Commission, where authorised to do so under this Directive.

Member States will ensure that the supervisory authority is independent in the exercise of its functions.

In addition, the proposal:

- lays down the conditions for information requests by supervisory authorities and the accompanying safeguards, including the applicable thresholds;
- lays down rules on cross-border cooperation as well as rules on cross-border information requests between supervisory authorities;
- sets up an advisory group of representatives of the supervisory authorities assisting the Commission in certain tasks;
- contains a prohibition of activities intended to circumvent obligations in the Directive and obliges Member States to ensure the applicability of Directive (EU) 2019/1937 to the reporting of breaches of the Directive and the protection of persons reporting such breaches;
- provides that Member States are to lay down rules on sanctions for infringements of national provisions adopted to transpose certain provisions of the Directive.

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 VĂLEAN (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.

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.