



Secretariat of the Transparency Register

Ms Maite Pagazaurtundúa MEP
Vice-Chair
Committee on Civil Liberties,
Justice and Home Affairs
European Parliament

Sent only by email to:
maite.pagaza@europarl.europa.eu

Dear Ms Pagazaurtundúa,

In your letters dated 20 December 2022 and 16 January 2023 you express your concerns about non-EU countries linked to corruption scandals and interference strategies, in the context of ongoing judicial investigations, and exerting undue influence on European policy and decision-making through interest representatives, which are registered in the Transparency Register.

As you are aware, the European Parliament, the Council of the European Union and the European Commission have set up a mandatory Transparency Register ⁽¹⁾ to ensure that influencing activities directed at the EU institutions are both transparent and ethical, including when they are performed on behalf of foreign governments via non-diplomatic channels. Entities registered in the Transparency Register, when acting as intermediaries for interest representation activities, must reveal their clients, including when these are third country governments and/or public authorities.

⁽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 L 207, 11.06.2021, p 1](#) (the 'IIA').

As you have rightly stated in your letters, the institutions must not tolerate actions or behaviour that can cause damage to the reputation of the Union institutions. In line with the provisions of the IIA and under the guidance and oversight of the Management Board, the Transparency Register Secretariat addresses situations where this is at stake. You will recall the launch last year by the Secretariat, following the instruction of the Management Board, of investigations into all registered entities with a head office in the Russian Federation.

Now, in light of the recent events, the Secretariat is already in the process of investigating specific cases of registered interest representatives caught up in the corruption allegations and it has, as a precautionary measure, already suspended those entities potentially in breach of the code of conduct ⁽²⁾, where a judicial investigation has been opened by national authorities. Further investigations may be opened in the light of information that gives rise for the Secretariat to suspect a reasonable probability of non-observance of the code of conduct. In this context, we would like to encourage you to use the Transparency Register in your contacts with interest representatives. We would also point out that while the database in its present format does not allow for a specific listing of third country representation on the part of intermediaries, this is clearly an area where we will seek future technical improvements.

Please rest assured that the Secretariat is doing its utmost to identify and address any situation which constitutes a potential breach of the code of conduct. This includes the matters mentioned in your letters, namely situations where interest representation activities of third countries are suspected to be unduly taking advantage of registrations of intermediaries or other entities without diplomatic status in the Transparency Register. To do so, the Transparency Register Secretariat avails itself of the IT tools and investigative powers ⁽³⁾ at its disposal.

Sincerely,

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

⁽²⁾ Annex I to the IIA.

⁽³⁾ As provided for and in accordance with the administrative procedures set out in Annex III to the IIA.