

Doris Dialer* - 17 March 2026

Regulation of ‘Foreign’ Lobbying in the EU: Mission Impossible?

Brussels: Lobbyist’s Paradise

After Washington, D.C., Brussels is the world’s second-largest hot spot for both diplomacy and lobbying. The 2024 report by the German-based watchdog-NGO LobbyControl¹ underlines that corporate lobbyists alone spent some €1.3bn in 2023 to influence decision-making in the EU. However, there is no uniform definition of lobbying. In its Green Paper on the European Transparency Initiative, the European Commission defines lobbying, which it prefers to call “interest representation”, – similarly to the Council of Europe and the OECD – as ‘all activities carried out with the objective of influencing the policy formulation and decision-making processes of the European institutions’².

Moreover, there is no strict typology of the Brussels lobbying scene. Thus, lobbying can be differentiated in various ways, according to its organisational form, lobbying activity or policy area (e.g. finance, pharma or tech lobby). In general, the EU distinguishes between associations (umbrella, industry, professional, consumer, and business associations), particular interests (private companies, corporate representatives), public interest organisations, and non-governmental organisations (NGOs), commercial service providers (public affairs agencies, consultancies, law firms), think tanks, academic institutions, religious communities, public authorities, and, only recently, third states.³

The involvement of various groups of interests and external expertise improves the quality of decision-making (input legitimacy) and gives decisions a representative quality (output legitimacy). Against this backdrop, non-transparent lobbying practices and undue influence have triggered public outrage⁴ and in the aftermath has led to stricter regulatory measures at both member state and EU levels.

Securitisation⁵ of Lobbying

Owing to ongoing multiple global crises and geopolitical cleavages, EU lobbying has been challenged by progressive dynamics. Since the so called “Qatargate”⁶ scandal – the use of Brussels-based human rights NGOs to funnel cash to Members of the EU Parliament (MEPs) for the promotion of issues of interest to Qatar and Morocco⁷, and the attempts by China and Russia to influence EU decision-makers – foreign lobbying has been framed a security risk in a series of recent EU policy reports.

Both the European democracy action plan⁸ (adopted 22/1/2026) and especially the EU Parliament’s report on foreign interference underline ‘integrated lobbying strategies combining industrial interests and foreign political goals, particularly when they favour the interests of an authoritarian state’ as a threat⁹. On 12 December 2023 – on the eve of the June 2024 10th European Parliament Elections –, the Commission published, as part of its Defence of Democracy package, a proposal for a directive establishing harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries, amending Directive (EU) 2019/1937.¹⁰ In line with Article 2 TEU, this initiative also aims to enhance the integrity of, and public trust in, the European Union and Member State democratic institutions.

Regulatory Challenges

Quite apart from recent transparency initiatives regarding third-state lobbying, regulation of lobbying (inside and outside) as such has been the subject of academic research since the early 1990s. As a result, EU Lobbying soft law now encompasses transparency rules, measures related to physical access, financing, conflicts of interest and revolving door provisions, codes of conduct and ethical concepts. However, there is as yet no EU-wide lobbying law, but

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rather different lobbying laws and non-harmonised transparency approaches in the 27 EU member states.¹¹ Finally, the EU is, after all, a supranational union made up of Member State governments that are all prone to foreign lobbying individually, which could indirectly translate to EU level.

Publicly accessible registers for lobbyists represent the most commonly used regulatory instrument, reflecting a conviction that transparency enables accountability and ultimately increases citizens' trust in the political system. While lobby registers have a long tradition in the US and Canada, with relevant laws passed in 1946 and 1989 respectively, they are relatively new in Europe.¹² With the exception of Germany¹³, European countries only began establishing such transparency tools after 2005, with the effect that currently some form of lobby registration is required in almost two thirds of the 27 EU member states.¹⁴ This growing trend justifies a closer look at the EU's Transparency Register, not least since some of the national lobbying registers have looked to it for inspiration.¹⁵

EU Lobbying Register - *Ultima Ratio*?

On 20 May 2021¹⁶ the EU Parliament, the Council and the EU Commission signed an Inter-Institutional Agreement (IIA) on a de facto mandatory transparency register with an accompanying political statement¹⁷ making registration a precondition for certain lobbying activities. According to the principle of "conditionality", the EU legislative bodies are obliged to meet only with lobbyists who are registered in the [EU Transparency Register](#) (EUTR). A list of the [conditionality and other transparency measures](#) currently in force in the EU institutions can also be found on the EUTR website.

The EUTR is geographically indiscriminate and targets all activities that influence 'the formulation or implementation of policy or legislation, or the decision-making processes' within the EU (Art. 3). The EUTR asks registrants to declare their policy interests, lobbying expenses, membership in EU consultative structures (e.g. [expert groups](#)), and staff responsible for public affairs. This information becomes publicly available as part of a searchable online lobby database.¹⁸

By signing up to the EUTR, interest representatives commit to a code of conduct setting out the ethical

rules and principles to be fully respected in their lobbying activities.¹⁹ Although, registration is voluntary due to the non-binding nature of the IIA, the EUTR has become a success story and has grown steadily from its inception in 2011²⁰, with the Council also finally participating, having only played an observer role since 2014. In March 2026, the EUTR can boast around 17,100 registrants.

The latest IIA specifically covers lobbying activities on behalf of third countries, when carried out by entities without diplomatic status or through intermediaries.²¹ This means that consultancies (both EU or non-EU), public affairs firms, think tanks or NGOs need to disclose their third country governments as 'sovereign clients'. Of course, governments are not the only clients, and, for instance, there is an increasing demand for EU-based intermediaries to handle talks between multinational tech companies and policy-makers.²²

In addition, EU institutions have reached an agreement for all Russian companies to be removed from the EUTR with the effect that Russian lobbyists will no longer be able to enter Parliament or meet with members of the Commission.²³ Furthermore, in June 2022, the Council decided that it would be prohibited from 'providing, directly or indirectly, ... business and management consulting or public relations services to: a) the Government of Russia; or b) legal persons, entities or bodies established in Russia'.²⁴ These bans are significant because it is the first time that the EU has imposed lobbying prohibitions on a third country.

Conclusion

In 2026, the EU Transparency Register continues to be the reference tool for screening lobbying activities of any kind carried out at EU level. This is particularly significant as the EU is facing a rapidly changing international environment that affects not only its global role but also the ways in which it interacts with third countries. Over the past decades, of course, European integration, as well as enlargement, have created venues and opportunities for foreign lobbying. Indeed, lobbying is increasingly used by third country governments alongside formal diplomatic channels and processes to promote their policy objectives.²⁵

However, while lobbying activities are an inherent feature of democracies, the increasing complexity of

policy-making is blurring the lines between lobbying and diplomacy. A future challenge for the EU will be to establish a functional system of monitoring and sanctions on the one hand and on the other, to provide fair opportunities for representation to all types

of interests regardless if they are “foreign” or “domestic”.²⁶ In this context, the tension between the functional need for openness and the necessity for regulatory measures and control is likely to become even more important in the years to come.²⁷

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- 20 *The TR originally was a merger of the lobbyist’s accreditation system of the EU Parliament, in place since 1996, and the EU Commission’s (voluntary) register of interest representatives, set up in 2008.*
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