

Transparency Register

Guide



Publications of the Ministry of Justice, Reports and guidelines 2023:17

Transparency Register

Guide

Ministry of Justice, Finland Helsinki 2023

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Transparency Register Guide

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Abstract

The purpose of this guide is to provide a general description of the Transparency Register, and the key concepts, methods and actors related to it. The guide is intended for those who are influenced by lobbying, those engaged in the representation of interests and its consultancy, those who are otherwise involved with the Transparency Register and those are interested in its contents.

Any representation of interests, i.e. lobbying activities that target Parliament and the ministries are entered in the Transparency Register, as are any lobbying consultancy.

Registering information in the register is the responsibility of lobbyists, and with the establishment of the Transparency Register information on these activities will become more transparently available for viewing by the public.

The purpose of the Transparency Register is to improve the transparency of decision-making and make unofficial lobbying related to decision-making more visible.

Keywords lobbying, openness, influencing, publicity, principle of openness, register

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Avoimuusrekisteri Opas

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Tiivistelmä

Tämän oppaan tarkoituksena on antaa yleiskuvaus avoimuusrekisteristä, siihen liittyvistä keskeisistä käsitteistä, menettelyistä ja toimijoista. Opas on tarkoitettu niin vaikuttamiskohteille kuin vaikuttamistoimintaa ja sen neuvontaa harjoittaville, avoimuusrekisterin kanssa muuten tekemisissä oleville kuin kaikille avoimuusrekisteristä kiinnostuneille.

Avoimuusrekisteriin merkitään eduskuntaan ja ministeriöihin kohdistuvaa vaikuttamistoimintaa eli lobbausta ja siihen liittyvää vaikuttamistoiminnan neuvontaa eli lobbauksen konsultointia.

Ilmoituksen tekeminen avoimuusrekisteriin on lobbaajien velvollisuus ja avoimuusrekisterin myötä tällainen toiminta tulee avoimesti yleisön tarkasteltavaksi.

Avoimuusrekisterin tarkoituksena on parantaa päätöksenteon avoimuutta ja tehdä näkyvämmäksi päätöksentekoon liittyvää epävirallista vaikuttamistoimintaa.

Asiasanat lobbaus, avoimuus, vaikuttaminen, julkisuusperiaate, julkisuus, rekisteri

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Referat

Syftet med denna handbok är att ge en allmän beskrivning av öppenhetsregistret, de centrala begreppen, förfarandena och aktörerna i anknytning till det. Handboken är avsedd såväl för dem, som är föremål för påverkanskommunikation, som för dem som bedriver påverkanskommunikation och rådgivning i anslutning till denna påverkanskommunikation, de som annars har att göra med öppenhetsregistret och för alla som är intresserade av öppenhetsregistret.

I öppenhetsregistret antecknas påverkanskommunikation som utövas på riksdagen och ministerierna, dvs. lobbning, och rådgivning i anslutning till denna påverkanskommunikation, dvs. konsultdriven lobbning.

Det är lobbarnas skyldighet att göra anmälan till öppenhetsregistret och genom öppenhetsregistret kan sådan verksamhet öppet granskas av allmänheten.

Syftet med öppenhetsregistret är att förbättra öppenheten vid beslutsfattande och göra inofficell påverkanskommunikation i anknytning till beslutsfattande mer synligt.

Nyckelord lobbning, öppenhet, påverkan, offentlighet, offentlighetsprincipen, register

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Contents

1	General	7
1.1	Why was the Transparency Register established?.....	7
1.2	How does the Transparency Register work?.....	8
1.3	When will the Transparency be opened?.....	9
2	Transparency Register vocabulary	10
3	Who does the Transparency Register apply to?	13
3.1	Actors subject to the obligation to provide information and exceptions.....	14
3.2	Parties being influenced by lobbying.....	14
3.3	Activity that is subject to the obligation to provide information.....	16
3.3.1	Lobbying.....	17
3.3.2	Consultancy of lobbying.....	17
3.3.3	Certain exceptions to activities.....	18
4	What information is entered in the Transparency Register and when?	22
4.1	Registration notification.....	22
4.2	Operating notification.....	23
4.3	Annual calendar for the Transparency Register.....	25
4.4	End of obligation to provide information.....	26
4.5	Openness and archiving of information.....	26
5	How is the Transparency Register supervised?	27
5.1	National Audit Office as the register's supervisor.....	27
5.2	The supervisory authority's right to access information.....	27
5.3	Sanctions for neglecting the reporting obligation.....	28
5.4	Annual report on the Transparency Register.....	28
6	Advisory Board	29

1 General

The purpose of this guide is to provide a general description of the Transparency Register, and the key concepts, methods and actors related to it. The guide is intended for lobbyists, those who provide communication on the representation of interests as well as for all actors that engage in lobbying or its consultancy. The guide also contains information on those targeted by lobbying and anyone who utilises the register's information.

1.1 Why was the Transparency Register established?

The purpose of the Transparency Register is to improve the transparency of decision-making. Any representation of interests i.e. lobbying that targets Parliament or the ministries is entered in the register as is information on lobbying consultancy. The Transparency Register will make it easier to follow the functioning of the political system. At the same time, the openness principle will expand to various forms of communication.

Over the past few decades, dialogue between decision-makers, officials and parties that engage in lobbying has increased and become more regular and the popularity of network-like cooperation has increased. Other factors that are closely related to this development are revolving door phenomenon, increasing professionalism in lobbying and the establishment of the lobbying communication market. Publishing up-to-date information on lobbying in the Transparency Register will highlight that lobbying is a central and important part of democratic system and will dispel doubts about lobbying.

The Transparency Register will allow the easier submission of data requests on authorities' relations, as based on the information contained in the Transparency Register it will be easier for the party submitting the data request to indicate which specific documentation they are requesting. In addition, the Transparency Register will bring political decision-makers and their assistants increasingly under the scope of the principle of openness, which will improve the ability of citizens to follow the dialogue surrounding political decision-making.

The Transparency Register is a national register related to lobbying. To view data on lobbying at the level of the European Union, view information in the EU Transparency Register.¹

Various registers that apply to lobbying have become more common over recent years. Ireland, for one, adopted its own national Register of Lobbying in 2015, and Austria has had a lobby register in place since 2013. Finland is the first of the Nordic countries, where a national lobby register will be adopted.

Parliament approved two resolutions in connection with considering the Transparency Register Act. The resolutions require that the implementation and impacts of the Transparency Register be monitored. The need to extend the scope of application of the Transparency Register will also be assessed based on experiences gained.

The Ministry of Justice is responsible for monitoring and developing the legislation concerning the Transparency Register. The National Audit Office is responsible for overseeing notifications registered to the Transparency Register and the supervision of the obligation to provide information.

1.2 How does the Transparency Register work?

The Transparency Register is a public register that is accessible online, and which anyone can view. The register contains information on lobbyists, representation of interests and on the resources used for influence.

The register can be found at avoimuusrekisteri.fi. Registering in the Transparency register and viewing the register are both free of charge.

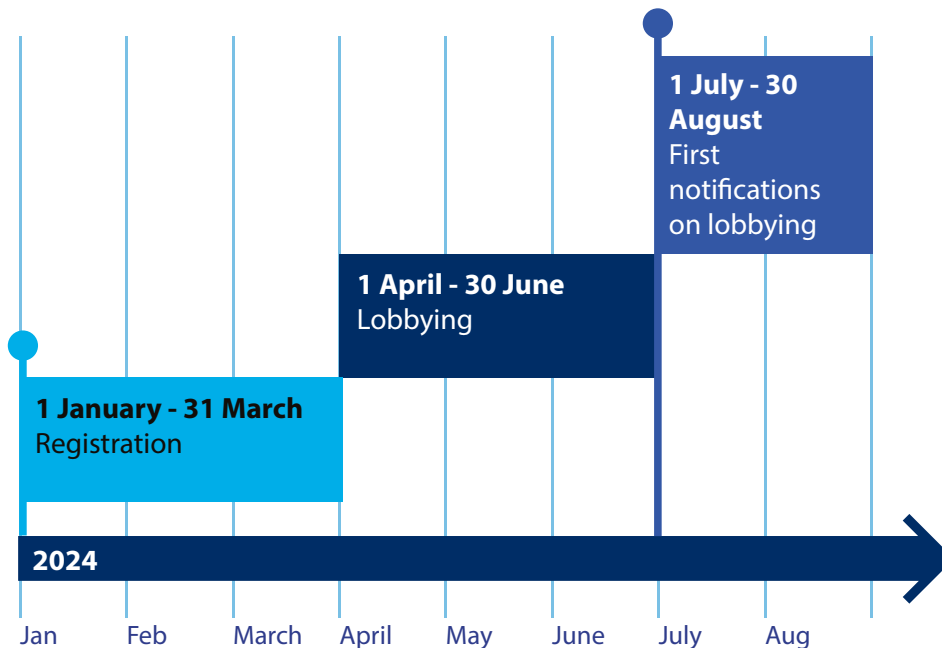
The Transparency Register functions on the basis of registrations. This means that an authority does not control the imported information in the register in advance, only supervises it ex post. This aims to ensure that the registration procedure does not limit or hinder the start of lobbying or engaging in the representation of interests.

Registrations can be submitted to the register in both Finnish and Swedish.

¹ The Transparency Register for the European Parliament, the Council of the European Union and the European Commission can be viewed [here](#).

1.3 When will the Transparency be opened?

Timetable for the first notifications



Parliament approved the Transparency Register Act (430/2023) on 24.2.2023 and the President of the Republic confirmed the Act on 23.3.2023.

The Transparency Register Act will enter into force on 1 January 2024, at which point registration will begin.

The avoimuusrekisteri.fi website will open before the Act enters into force. The National Audit Office of Finland will supply any additional information on the timetable.

Provisions on the Transparency Register's Advisory Board entered into force earlier on 1.4.2023. The first advisory board will be appointed during 2023.

Registration notifications can be submitted starting 1 January 2024. Every party, who is obligated to submit a registration to the register between the date the Act enters into force 1 January 2024 and 31 March 2024, must do so at latest on 31 March 2024. The first notifications on operations to the Transparency Register will be submitted 1 July -31 August 2024. Financial data will be registered for the first time between 1 July – 31 August 2026 for the financial year 2025.

2 Transparency Register vocabulary

Consultancy of lobbying

The consultancy of lobbying is engaging in the influencing of interests at the commission of a client as one's livelihood or other consultancy work for clients related to this topic. The representation of interests carried out in the form of consultancy at the commission of a client is an example of lobbying consultancy.

Legal person

A legal person, who engages in the lobbying or its consultancy is obligated to submit information on their activities to the Transparency Register. Legal persons can include companies, associations and authorities. There are some exceptions to the obligation to provide information of legal persons. See section 3.1. for more information on how the obligation to provide information is established and on the exceptions to this concerning legal persons.

Lobbying

The representation of interests is the effort to influence a party preparing matters and making decisions through communication by promoting a certain interest or objective that a party engages in at one's own expense.

Notification period

Information on representation of interests is submitted to the Transparency Register twice a year. There are two notification periods each year: January-February and July-August. During the notification period, information is submitted to the Transparency Register on the influence work carried out during the previous reporting period.

Operating notification

An operating notification, which is submitted during the notification period, contains information on the representation of interests carried out and on its related consultancy. See section 4.2 for more information on submitting an operating notification.

Financial information concerning lobbying and its consultancy are submitted to the register once a year at the same time as the operating notification in July-August. See section 4.2 for more information on the submission of financial information.

Parties obligated to register

Legal persons and private business operators who engage in lobbying and its consultancy will be obligated to register. The obligation to provide information will only apply to private business operators, whose primary activities comprise lobbying and its consultancy. The obligated parties must submit their registration and an operating notification to the Transparency Register. The obligation to provide information always applies to the party engaging in the representation of interests and its consultancy not the party being influenced.

Party being influenced by lobbying

The party influenced by lobbying is the party that a lobbyist targets. The parties being influenced listed in the Transparency Register include Parliament and the Ministries. See section 3.2 for more information on parties influenced by lobbying.

Private business operator

A private business operator, who engages in lobbying is subject to the obligation to provide information to the Transparency Register. Private business operators who do not engage in lobbying and its consultancy as their primary form of business are not subject to the obligation to provide information. See chapter 3 for more information on how the obligation to provide information is established and on its exceptions.

Registration notification

A registration notification on the start of lobbying and its consultancy must be submitted at latest on the day that lobbying begins. See section 4.1 for more information on the registration notification.

Reporting period

The calendar year is divided into two six months reporting periods: January-June and July-December. Information on the representation of interests carried out during a reporting period must be submitted to the Transparency Register during the notification period following the reporting period.

Supervisory authority

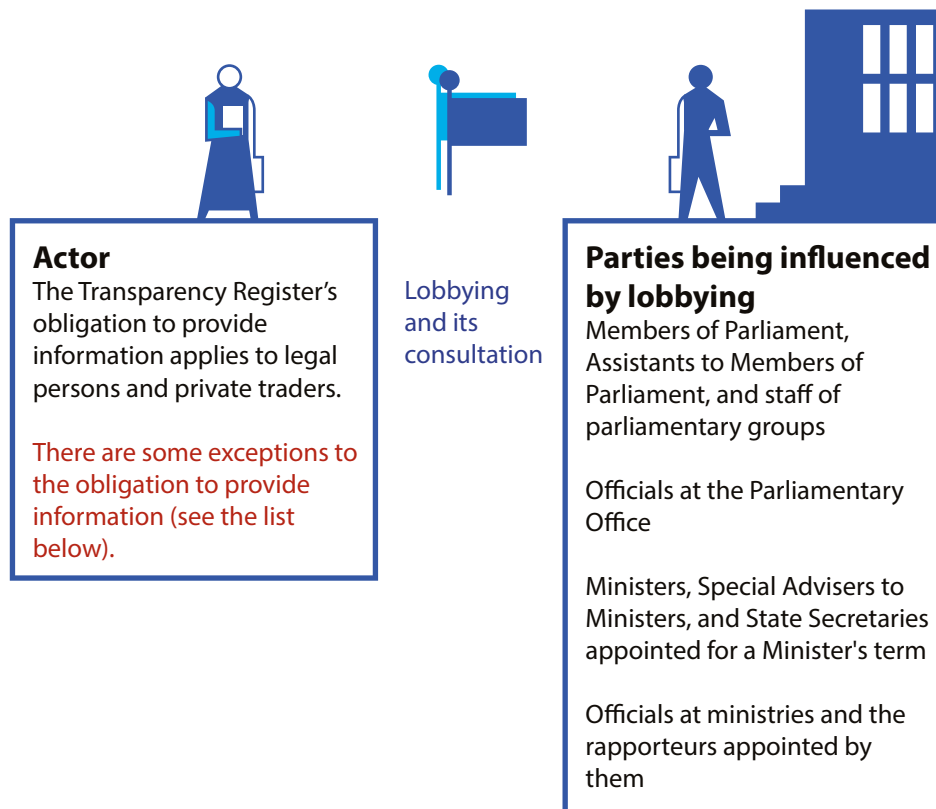
The National Audit Office is register's supervisory authority and it monitors the information submitted to the Transparency Register. See Chapter 5 for more information on the supervisory authority's duties.

Transparency Register

The register to which information concerning the representation of interests that is targeted at Parliament and ministries and lobbying consultancy will be registered. Provisions on the Transparency Register are laid down in the Transparency Register Act (430/2023). The register is maintained and supervised by the National Audit Office. The register can be found online at avoimuusrekisteri.fi.

3 Who does the Transparency Register apply to?

Legal persons and private business operators who engage in lobbying of Parliament and the Ministries or its consultancy are subject to the obligation to provide information to the Transparency Register.



3.1 Actors subject to the obligation to provide information and exceptions

Legal persons and private business operators are actors subject to the obligation to provide information. However, there are some exceptions to the provisions concerning the actors subject to the obligation to provide information.

Parties not subject to the obligation to provide information to the Transparency Register include;

- private persons
- private business operators who do not engage in lobbying and its consultancy as their primary form of business
- unorganised non-profit activities, such as unregistered civil society and the constituency associations.
- limited liability housing companies
- a state, wellbeing services county, municipality or Province of Åland authority, state-owned enterprise or another independent public institution other than university
- the Parliament's Office Commission, the office of the Parliamentary Ombudsman, the National Audit Office and the Finnish Institute of International Affairs
- parties, party associations, parliamentary groups and the candidates' support group
- public body or actors when they engage in statutory duties
- international intergovernmental organisations
- representatives of a foreign state or the European Union, such as diplomats
- lawyers, licenced legal representatives or public legal aids except when they are lobbying or its consultancy which does not apply to the client's legal status, assisting the client in administrative matters, consultancy on the application of legal provisions or other legal consultancy related to the client's activities.

3.2 Parties being influenced by lobbying

The obligation to provide information is only established if the party being influenced by lobbying is Finland's Parliament or Ministries. For example, lobbying that aims to influence municipal decision-makers or government agencies is not registered in the Transparency Register.

Parliament

Parliament refers to:

- Members of Parliament
- Assistants to Members of Parliament
- Staff of parliamentary groups
- Parliamentary officials.

Ministry

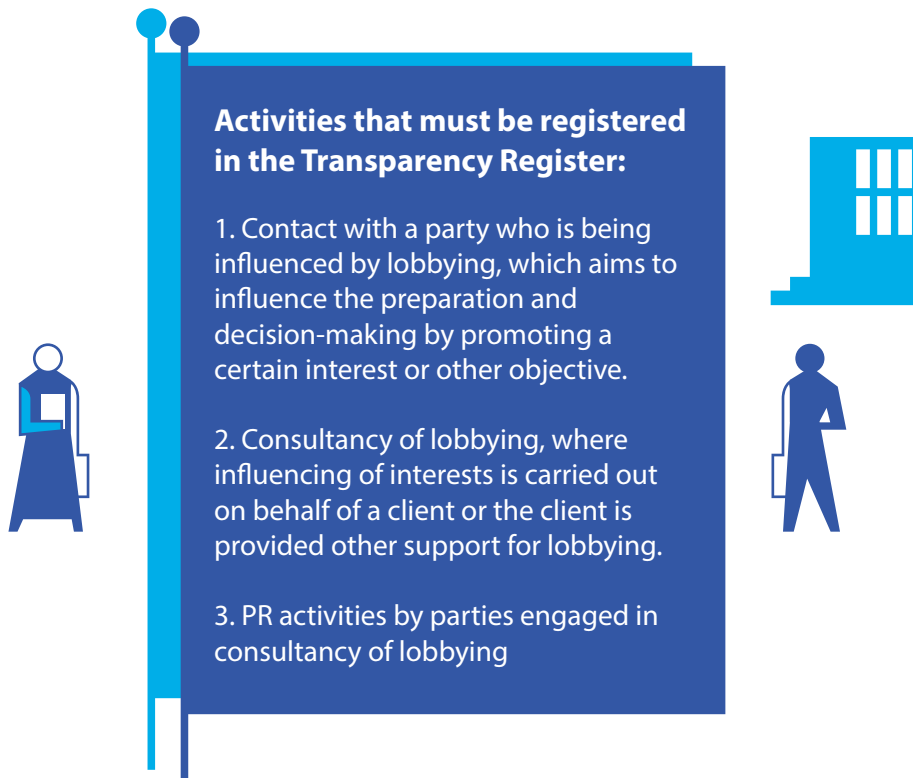
Ministry refers to:

- Ministers
- the State Secretaries appointed for the Minister's term
- Special Advisers to the Ministers
- Officials employed by ministries
- Rapporteurs appointed by the ministries.

The Transparency Register does not require any action from the parties being influenced by lobbying and they are not subject to any obligations. The party engaging in lobbying or its consultancy is always the one who is subject to the obligation to provide information.

The party influenced by lobbying has the right to request that any incorrect or incomplete information in the register is corrected. The information registered in the register are covered in Chapter 4 and the supervision of the register is covered in Chapter 5.

3.3 Activity that is subject to the obligation to provide information



Activities that must be registered in the Transparency Register:

1. Contact with a party who is being influenced by lobbying, which aims to influence the preparation and decision-making by promoting a certain interest or other objective.
2. Consultancy of lobbying, where influencing of interests is carried out on behalf of a client or the client is provided other support for lobbying.
3. PR activities by parties engaged in consultancy of lobbying

Information on the following does not need to be submitted to the Transparency Register:

- Small-scale lobbying
- Normal use of services with authorities
- Public appearances at public meetings and events
- Mass media and sending newsletters
- Data collection for the purpose of journalism
- Participation in consultation and in a working group appointed by an authority
- Consultancy of lobbying for public administration actors and some other parties listed in the Act.
- Acting as an authority's rapporteur
- Communication included in state ownership steering
- A party's communication with its immediate community
- Communication that endangers public safety or national security when submitted to the Transparency Register

3.3.1 Lobbying

The representation of interests is the effort to influence a party preparing matters and making decisions through communication by promoting a certain interest or objective that a party engages in at one's own expense. These interests and objectives are often related to political, business or other social interests.

The preparation of matters and decision making are interpreted quite a broad-scoped manner with regard to the Transparency Register. For example, information must be provided on any early influence that does not apply to any formally started preparation. In addition, lobbying that is subject to the obligation to provide information does not need to apply to any specific decision or project. The purpose of the Transparency Register is to highlight the long-term, systematic nature of lobbying.

A key aspect of lobbying is contact between the lobbyist and the party being influenced by lobbying. The form and the direction of the contact are irrelevant. Contact can be in the form of meetings, phone calls, emails or other similar means of contact.

The register's authority meaning the National Audit Office assesses the lobbying with regard to the Transparency Register on a case-by-case basis in instances where it is unclear whether the obligation to provide information has been established. The register authority will provide advice and guidance to actors where necessary.

However, not all contact with the party being influenced constitutes an obligation to provide information. Some matters fall outside the scope of the Transparency Register. Section 3.3.3 provides more information on the activities that fall outside the scope of the register.

3.3.2 Consultancy of lobbying

Consultancy of lobbying includes when a company or person engages in lobbying on behalf of a client. In this case, a company providing consultancy of lobbying will maintain contact with the party being influenced by lobbying on behalf of their client. Lobbying consultancy can also include just support for lobbying carried out by the client. Lobbying consultancy is provided by communication firms and other consultancy firms.

Establishment of the obligation to provide information does not require that a client specifically purchases a service related to public affairs, as the service can also involve communication and marketing services, internal development or legal consultation. The obligation to register does not depend on how the client implements communication, it only depends on the nature of the provided consultancy and support. It is of key importance that the consultant recognises the nature of both their own activities and those of their client and their link to endorsing the interests of the client.

However, not all the consultation services provided to the client and related to influencing must fall within the scope of the obligation to provide information. For example, the various training, communication, marketing and research services and business strategy training provided to the client that are not related to the client's lobbying activities do not fall under the obligation to provide information.

The training that advocacy organisations provide for their own members is not subject to the obligation to provide information.

The register authority will assess the nature of the lobbying consultancy activities on a case-by-case basis in instances where it is unclear whether there is an obligation to provide information to the Transparency Register.

When the consultancy of lobbying is in question, the company providing consultancy is subject to the obligation to provide information.

Who engages in consultancy of lobbying must also submit a notification report on contacts outside the client relationship to parties being influenced if the actor conducting the consultancy strives to create such contacts with the parties being influenced that can be used for conducting consultancy of lobbying or to exchange information with the parties being influenced.

The client shall be subject to the obligation to provide information in all matters concerning the lobbying carried out by the client themselves.

3.3.3 Certain exceptions to activities

No notifications are submitted to the Transparency Register for the following:

Small-scale lobbying

Small-scale lobbying is an activity where a lobbyist is in contact with parties they are making an effort to influence no more than five times during a calendar year.

One contact can be a telephone conversation or an email. One contact can involve numerous recipients. For example, an email sent to several recipients is only counted as one instance of making contact.

However, mass communication that is generally unilateral to a large group is not usually considered a contact. For more information see the section Mass media and sending newsletters below.

Normal use of services with authorities

The normal use of services provided by authorities include taking care of permit and subsidy matters. In addition, the performance of statutory duties with an authority, and the authority's guidance, audit, counselling or data collection activities constitute the normal use of services provided by authorities.

Data collection for the purpose of journalism

Information is not provided to the register on data collection for use in journalism. When carrying out an assessment of whether the data collection was performed for journalistic purposes attention should be paid to the Council for Mass Media in Finland's Journalistic Guidelines.

Participation in consultation and in a working group appointed by an authority

Participation in working groups, advisory boards and similar bodies at the invitation of authorities or taking part in a consultation process does not make one subject to the obligation to provide information. This type of communication is documented by authorities as part of their normal administrative duties.

Communication included in state ownership steering

Meetings of the boards and supervisory boards and other official communication related to state ownership steering fall outside the scope of the Transparency Register, as they are documented otherwise. On the other hand, information on other, unofficial communication involving state ownership steering must be submitted to the Transparency Register.

An entity affiliated with a political party communicating with party's own Members of Parliament, assistants to Members of Parliament, Ministers, special advisers to Ministers and the State Secretaries appointed for a Minister's term in office.

The obligation to provide information is not established when an entity affiliated with a political party communicates with party's own Members of Parliament, Ministers, special advisers to Ministers and the State Secretaries appointed for a Minister's term in office.

Public appearances at public meetings and events

Lobbying in the form of public appearances at public meetings and events is not subject to registration in the Transparency Register.

Public appearance refers to speaking at or being present as an audience member at a meeting or public event. Typical public events include fairs, markets, festivities intended for the public, sporting events and exhibitions.

Various events can include both events open to the general public and smaller, closed events that are intended for a smaller group. The latter of these would not meet the criteria for a public event.

Communication that endangers public safety or national security when submitted to the Transparency Register

Communication that could endanger public safety or national security when submitted to the Transparency Register fall outside the scope of the Transparency Register.

Acting as an authority's rapporteur

The rapporteurs appointed by authorities are not subject to the obligation to provide information. Often, rapporteurs act as private persons, meaning they fall outside the scope of the obligation to provide information.

Mass media and sending newsletters

Mass media is not subject to the obligation to provide information. Mass media refers to the editorial of information, opinions and other messages to a freely-determined audience. Newsletters or similar messages that are, as a rule, unilateral, and are intended for a large group and generally for disclosure to the public are not subject to the obligation to provide information.

Consultancy of lobbying for public administration actors and some other parties listed in the Act

No notification need to be submitted on consultancy of lobbying provided to actors who are not subject to the obligation to provide information under the Transparency Register Act. These actors have been listed in section 3, subsection 2(1-7) of the Transparency Register Act:

- private traders, whose main line of business does not include lobbying or its consultation,
- housing companies,
- a state, wellbeing services county, municipality or Province of Åland authority, state-owned enterprise

- an independent public institution other than a university,
- the Parliamentary Office, the office of the Parliamentary Ombudsman, the National Audit Office and the Finnish Institute of International Affairs,
- political parties, party associations, parliamentary groups and the candidates' supporting organisations,
- public body or actor when they engage in statutory duties,
- international intergovernmental organisations and representatives of foreign states and the European Union.

4 What information is entered in the Transparency Register and when?

Information on lobbying and its consultancy are submitted to the Transparency Register with a registration notification and an operating notification.

A notification will also be submitted if lobbying or its consultancy is terminated or it becomes small-scale permanently.

The information is always submitted by the party subject to the obligation to provide information meaning the party engaging in lobbying or its consultancy.

4.1 Registration notification

A private business operator or legal person (obligated to register), who engages in lobbying and its consultancy, shall submit the following information to the register:

- their trade name and possible auxiliary trade names
- their business ID or comparable identifying code
- their contact details
- their primary line of business and a general description of their activities
- their membership to associations that engage in lobbying.

These are referred to as basic information. The supervisory authority supplements the basic information with additional information on the date of registration and any conditional fines possibly imposed by the supervisory authority.

The party engaging in lobbying or its consultancy must submit a registration notification at latest on the start date of lobbying or its consultancy.

The party subject to the obligation must notify of any changed to the information immediately. In addition the party subject to the obligation must notify if the lobbying or its consultancy ends or it becomes small-scale lobbying permanently.

Basic information is public and is available to anyone from the Transparency Register.

After submitting the registration notification, the party engaging in lobbying or its consultancy will submit information on their activities with an operating notification.

4.2 Operating notification

The party subject to the obligation to provide information will provide information on the lobbying or its consultancy in which they have engaged in the operating notification.

The information submitted will depend on whether the subject is engaged in lobbying or its consultancy.

The subject of the obligation will provide the following information in the operating notification secrecy provisions notwithstanding:

The following information will be submitted on **lobbying activities**:

- the party who is being influenced by lobbying
- the topic(s) concerning which they were contacted
- the primary methods for maintaining contact.

Financial information for lobbying activities include:

- the number of people engaged in lobbying during the previous calendar year and the person years used for lobbying
- the marketing and entertainment costs related to lobbying
- the cost of procured lobbying consultancy in euros

The following information will be submitted on **lobbying consultancy**:

- the client's trade name or possible auxiliary trade name, business ID or other comparable ID, email or postal address and telephone number at which the client can be contacted
- information on who/what they focus their lobbying activities on
- information on the type of support provided to the client.

Financial information for lobbying consultancy include:

- the turnover for consultancy of lobbying in euros.

Who engages in consultancy of lobbying submits a notification report on contacts outside the client relationship to parties being influenced. Notification includes the name of the party being influenced, topics and main means of communication.

An operating notification will be submitted twice a year.

Financial information will be submitted once a year. Financial information is submitted for the first time for the full calendar year following the registration notification.

See section 4.3 for more information on when the notifications should be submitted.

If lobbying during the first reporting period of the calendar year does not exceed the limit for small-scale representation of interests (5 contacts at most), an operating notification is only submitted once a calendar year during the first notification period in January-February.

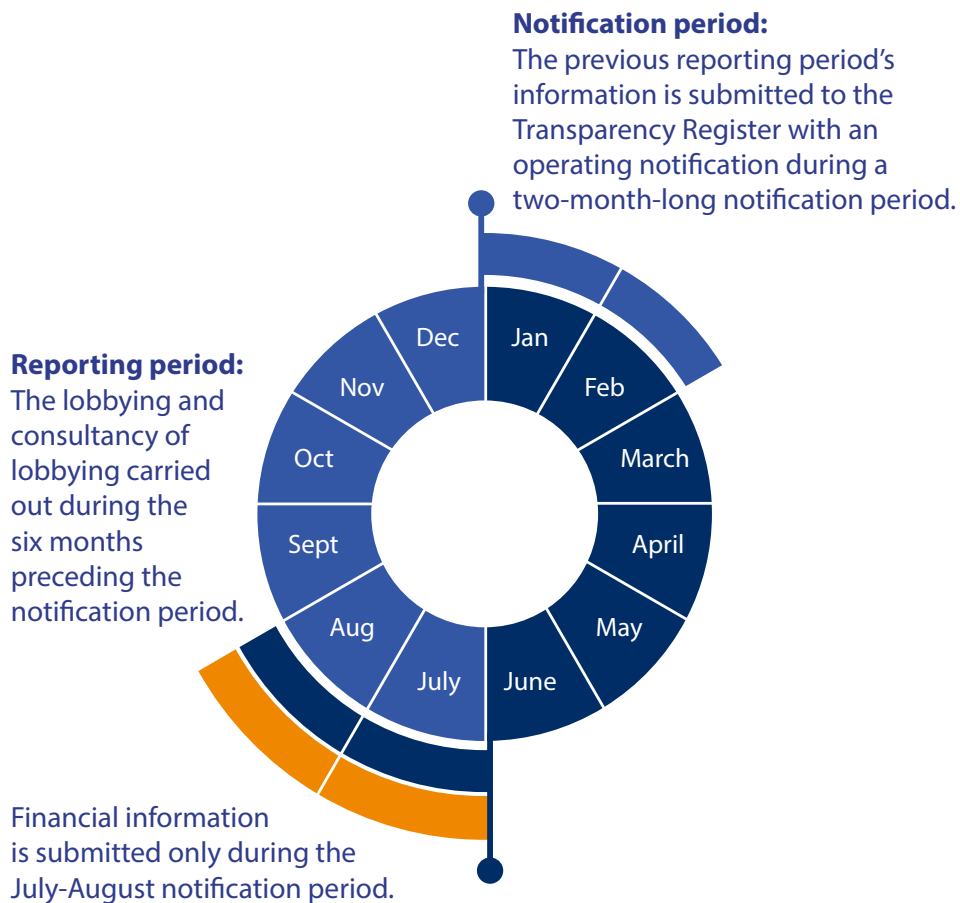
A party subject to the obligation to provide information must state in their operating notification if they have not engaged in **any** of the following during the preceding six month period:

- lobbying activities
- consultancy of lobbying
- lobbying-related contact with a party outside of a client relationship, where the aim of the party engaging in consultancy of lobbying is to create communication and contact with the party to be influenced in a manner that will benefit the consultancy of lobbying or the exchange of information with parties influenced by lobbying.

Operating notifications are public and they are available to anyone from the Transparency Register.

4.3 Annual calendar for the Transparency Register

The calendar year contains two registration periods and two reporting periods. A six-month reporting period is always following by a two-month notification period.



Information on lobbying activities is submitted to the Transparency Register twice a year (operating notification) during a two month-long notification period (January-February and July-August). The information submitted during the notification period covers the lobbying or its consultancy carried out over the past six months (reporting period).

Financial information is submitted only once a calendar year during the July-August notification period. The financial information submitted is always that of the previous calendar year.

4.4 End of obligation to provide information

The party obligated to register must submit a notification to the register if they downsize their lobbying activities permanently. The party obligated to provide information must also notify the register if they terminate all lobbying and lobby consultancy activities permanently.

Lobbying becomes small-scale permanently when the party engaged in lobbying notices that it has become small in scale and assesses that it will remain so in the future. A notification on the downsizing of activities permanently can only be submitted, if the activities have become small in scale during the same calendar year.

4.5 Openness and archiving of information

The Transparency Register is a public web service. The information registered to the Transparency Register are available to the public online, and anyone can view them.

The information is available in the web service to the public for a period of 10 years, after which it will be archived permanently for later use, such as for research.

5 How is the Transparency Register supervised?

The National Audit Office is responsible for overseeing notifications registered to the Transparency Register and the supervision of the obligation to provide information.

5.1 National Audit Office as the register's supervisor

The supervisory authority guides and provides advice to parties subject to the obligation to provide information on the notifications they must submit.

The National Audit Office can look into any negligence related to the Transparency Register at its own initiative on the basis of a request of the party who has been influenced by lobbying, a tip provided by an external party or information that has been discussed publicly.

The National Audit Office can submit an improvement notice to a party obligating them to submit a notification or to add, supplement or correct information in the Transparency Register.

To guarantee the effectiveness of the improvement notice, the National Audit Office can impose a conditional fine.

5.2 The supervisory authority's right to access information

Notwithstanding secrecy provisions, the party subject to the obligation to provide information must provide clarification related to the registration notification and operating notification to the National Audit Office at its request. The supervisory authority's right to access information is provided on in section 10 of the Transparency Register Act.

If the clarification provided by the obligated party is not sufficient, the National Audit Office may request additional clarification also from the party influenced by lobbying.

Information on requests for additional clarification and the additional clarification provided are not submitted to the Transparency Register, but will be documents kept by authorities to which the Act on the Openness of Government Activities applies.

5.3 Sanctions for neglecting the reporting obligation

The National Audit Office can impose a conditional fine to guarantee the effectiveness of an improvement notice. The National Audit Office's conditional fines committee will decide on imposing the payment of a conditional fine.

Provisions on conditional fines are laid down in the Act on Conditional Fines (1113/1990).

The supervisory authority submits information on conditional fines to the Transparency Register's registration notification's basic information.

5.4 Annual report on the Transparency Register

The National Audit Office draws up a report each year on the Transparency Register's functioning and supervision.

Once during each government term, the National Audit Office submits a report to Parliament on the functioning and supervision of the Transparency Register. Parliament discusses the report according to the Parliament's Rules of Procedure.

6 Advisory Board

An advisory board has been set up for the Transparency Register appointed by the National Audit Office. The role of the advisory board is to act as the Transparency Register's cooperation forum and monitor the functioning of the Transparency Register, present initiatives to develop the functioning of the register and act as an official cooperation organ for stakeholders. The advisory board also prepares recommendations for good practices in lobbying.

The advisory boards term is three years long. The advisory board is an advisory organ, and it does not exercise public authority. The advisory board selects a chair from among its members.

The first advisory board is due to be appointed during the year of 2023. Section 9 of the Transparency Register Act, which will enter into force on 1.4.2023, contains provisions on the advisory board.

The advisory board comprises representatives from those who are obliged to register, researchers, key ministries and authorities as well as other Transparency Register-related stakeholders.

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