

# Obligatory update of German Lobbying Register entries

## Increase of disclosure obligations and stricter deadlines

18 June 2024

### Stricter deadlines

- Basic data must now be **updated immediately**.
- The financial data must be entered within six months of the end of the financial year.
- Any submitted **draft laws and expert opinions** must be published quarterly.
- There are transitional provisions for circumstances prior to 1 March 2024.

### More specific description of the lobbying activities

- The lobbying activity must now be described in explicit and concrete terms; in particular, concrete regulatory projects must be stated.
- All **current, planned or intended lobbying projects** at federal and EU level must be stated.

### Publication of financial information now obligatory

- Among other things, information on the financial year, the number of employees, the main sources of financing and the financial expenses for the representation of interests must be entered. The possibility to opt-out from the disclosure of financial information has been removed.

### More obligatory disclosure requirements among others:

- Whether the representation of interests is also carried out personally by the authorised representatives of an enterprise.
- Designation of the persons responsible for representing interests, **even if they are not employees** but are otherwise responsible for the organisation. The number of persons involved in lobbying activities must be stated in **full-time equivalents**.
- Information on the so-called “**revolving door effect**” must be provided. Any mandate, office or function in the German Parliament, federal government or federal

administration currently or within in the **last five years** must be stated regarding the persons entrusted with lobbying activities.

- **Any draft law or expert opinions submitted must uploaded to the entry.** The obligation to publish submissions is triggered regardless of their form (e.g. e-mail to members of the German Parliament would suffice). Submissions must be uploaded in full but in anonymised form.

## Obligatory disclosure of commissioned lobbying

- The **identity of the principals** must be stated. This applies even if principals themselves are not obliged to have an entry to the German Lobbying Register. Subcontractors must also be disclosed.
- The **financial resources** made available for commissioning must be disclosed.

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