

Annual Report 2024 of the Finnish Transparency Register





The Finnish Transparency Register

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National Audit Office's oversight report



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The National Audit Office has acted as the registrar of the Finnish Transparency Register and overseen compliance with the disclosure obligation as stipulated in the Finnish Transparency Register Act (430/2023). Under section 9, subsection 1, paragraph 8 of the Act, the National Audit Office issues an annual report on the operation of the Register and on compliance with the disclosure obligation (Annual Report of the Finnish Transparency Register).

Helsinki, 1 August 2025

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Photograph in the oversight report
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Summary of the activities and key findings



The Finnish Transparency Register Act (430/2023) entered into force in Finland on 1 January 2024.¹ Its objective is to increase the openness of decision-making and to ensure transparent registration of long-term and systematic lobbying targeted at decision-making and of professional consultancy related to such lobbying.

Lobbying or lobbying consultancy targeting Parliament or the ministries is to be reported to the Register. The purpose of the Transparency Register is to enhance the openness of decision-making in Parliament and the ministries and to prevent inappropriate lobbying of central-government-level actors.

The National Audit Office of Finland (NAOF) is responsible for the maintenance and oversight of the Finnish Transparency Register. It is responsible for the operation of the Register, provides guidance to the relevant actors and oversees that disclosures are submitted in accordance with the law. It also appoints an Advisory Board for the Transparency Register and reports on the operation of the Transparency Register in an annual report and in a report submitted to Parliament once during a parliamentary term.

The online service of the Finnish Transparency Register, which enables the submission of statutory disclosures, has been built in phases during the entry into force of the Act so that the entire system is scheduled to be completed by the end of 2025. The information contained in the online service is public and can be browsed by anyone at avoimuusrekisteri.fi.

This annual report deals with the activities reported to the Finnish Transparency Register for 2024. However, the report also discusses events of 2025, as lobbying activities carried out in the latter part of the year are always reported at the beginning of the following year. As a result, the related oversight is also carried out in the following year.

The National Audit Office focused on the provision of guidance and advice and communicated actively with stakeholders

A key task, especially in the year the Finnish Transparency Register Act entered into force, has been the provision of guidance and advice for the entities subject to the disclosure obligation. The aim with this is to ensure that all entities subject to the disclosure obligation meet their disclosure obligations and to minimise non-compliance due to non-intention or carelessness.

In the initial phase of the Register, a significant number of disclosers needed some kind of guidance and advisory service in order to fulfil their obligations. To this end, the experts of the Finnish Transparency Register organised around 40 training sessions and webinars in 2023 and 2024 and participated as speakers in 43 different events. An audience of almost 3,000 was reached through these events.

In addition to the events, the Transparency Register experts have provided advice on a daily basis on all matters related to the Transparency Register and have regularly published various contents on the online service, in the newsletter and on the social media of the Finnish Transparency Register. The aim of versatile and up-to-date communications has been to make the Register and the new legislation familiar particularly to the entities subject to the disclosure obligation.

Registration with the Finnish Transparency Register started on 1 January 2024, and the first disclosures of activities were submitted in July

The Finnish Transparency Register Act obliged all entities engaged in lobbying or lobbying consultancy to register with the Finnish Transparency Register by 31 March 2024. In the first year, 1,113 organisations registered with the service. Of them, 71%, or 793, registered during the transition period.

All registered organisations are required to report their lobbying or lobbying consultancy twice a year through a disclosure of activities. In 2024, due to the transition period reserved for registration, the first reporting period was exceptionally shorter than the usual reporting period of six months: lobbying or lobbying consultancy carried out between 1 April and 30 June 2024 was to be reported in the first disclosure of activities.

The activities carried out between April and June were reported to the Register during the disclosure period that was open between July and August. A total of 1,003 disclosures of activities were published for the first reporting period. The number of disclosures of activities increased for the second reporting period of the year, as a total of 1,127 organisations reported activities carried out during the second half of the year. The disclosure period for the second half of the year (1 July to 31 December) was open in January–February 2025.

A large number of disclosures of activities were filed late

The registration authority verifies that the entities subject to the disclosure obligation have submitted their disclosures of activities in a timely manner and in the correct format. During both disclosure periods, the experts of the Finnish Transparency Register sought to instruct and advise disclosers to submit their disclosures of activities during the disclosure period. The entities subject to the disclosure obligation were reminded directly by email reminders and via newsletters, the website and social media, for example. Despite this, several entities submitted their statutory disclosures of activities late.

As many as 21% of the disclosures of activities submitted during the first disclosure period and 16% of the disclosures submitted during the second disclosure period were submitted late. Oversight of the Transparency Register revealed that, despite the provision of advice and guidance, the high number of late disclosures of activities was mainly due to misunderstandings and carelessness. Many entities subject to the disclosure obligation were unaware that they were obliged to submit the disclosure even if they had only engaged in small-scale lobbying or if they had carried out no lobbying at all.

The oversight focused initially on registrations

The National Audit Office oversees compliance with the registration and disclosure obligation and correctness of the disclosed information. In this role, it verifies that the registered organisations report their lobbying or lobbying consultancy regularly and that the organisations leaving the Register fulfil the criteria laid down for deregistration in the law.

In addition, the National Audit Office investigates suspected cases of non-compliance with the disclosure obligation and, if necessary, requests the discloser to submit a new disclosure, supplement a disclosure already made or provide information to clarify the suspected non-compliance. It may reinforce the oversight by imposing a penalty payment.

As there were no disclosures of activities at first, the oversight focused initially on registrations. Four oversight findings were made on the accuracy of the information provided in them. Two of the observations concerned information provided by the discloser about membership in an association engaged in lobbying. Both oversight cases were closed after the disclosers corrected their registrations following requests for clarification and opinions.

In the two other oversight findings, the National Audit Office suspected that incorrect information had been deliberately submitted to the Register. Based on the clarifications and opinions received in these cases, it was confirmed that the entities in question were in fact not engaged in lobbying at all. The National Audit Office decided to remove the registrations containing incorrect information and partly also inappropriate language from the Transparency Register. It also filed a police report on the matter in order to establish whether an offence related to a false entry in a register or giving false testimony to an authority had been committed.

The National Audit Office investigated a report on suspected non-compliance it had received

The National Audit Office received a report according to which a registered entity had not disclosed all lobbying activities it had carried out during the reporting period in its disclosure of activities. The National Audit Office investigated the matter and requested clarifications from the discloser.

The discloser provided the requested clarifications and supplemented its disclosure of activities during the investigation. The National Audit Office had no reason to doubt the accuracy of the information after it had been supplemented, and the oversight was discontinued when the case was closed.

The Advisory Board had an active dialogue on the Finnish Transparency Register

In 2023, the National Audit Office appointed an Advisory Board for the Transparency Register. The Advisory Board monitors the activities of the Finnish Transparency Register, takes initiatives to develop them and acts as an official cooperation body for stakeholders. The 33 members of the Advisory Board represent different public authorities, researchers, lobbying organisations and communications agencies.

The Advisory Board drew up recommendations for good lobbying practice, aimed at preventing inappropriate lobbying. The recommendations were published in summer 2024 after an extensive hearing of stakeholders, and at the time of writing this report, in May 2025, as many as 141 organisations engaged in lobbying or lobbying consultancy have already publicly committed to them.

The first Advisory Board has also otherwise carried out its statutory tasks through the active involvement of its chair, vice-chairs and members. During its first two years of operation, the Advisory Board met regularly, prepared a statement on the draft regulation on financial information on lobbying and had an active dialogue with the National Audit Office.

Financial information on lobbying will be reported to the Transparency Register starting from 2026

In addition to lobbying and lobbying consultancy, the financial resources used for them will be disclosed to the Finnish Transparency Register in future. Registered entities will disclose the financial information for the first time in 2026, once data for a full calendar year has been accumulated. Financial information will then be provided on lobbying and lobbying consultancy carried out in 2025.

The National Audit Office issued a more detailed regulation on how the financial information on lobbying and lobbying consultancy shall be compiled. The draft regulation was open for public comments in the Lausuntopalvelu service in autumn 2024. A total of 91 opinions were received, and based on them, the National Audit Office finalised the regulation in December 2024.

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1 What is meant by lobbying and why is it reported to the Finnish Transparency Register?

The establishment of the Finnish Transparency Register was one of the measures proposed in Prime Minister Marin's Government Programme to strengthen democracy and the rule of law.² In spring 2020, the Government set up a parliamentary steering group and an expert working group to prepare it. The parliamentary steering group and expert working group completed their work at the end of 2021, and the report on legislation concerning the Finnish Transparency Register³ was developed into a government proposal for the Finnish Transparency Register Act (HE 98/2022) by 2022. The Act entered into force on 1 April 2024, with the exception of section 11, which entered into force already on 1 April 2023.

Any long-term and systematic lobbying or lobbying consultancy that targets Parliament or the ministries is to be disclosed to the Finnish Transparency Register. The purpose of the Transparency Register is to improve the openness of decision-making in Parliament and the ministries and to prevent inappropriate influencing of central-government-level actors. Lobbying is an integral part of the political system and democracy, and the purpose of the Transparency Register is not to prevent lobbying but to increase its transparency.

1.1 Lobbying aims to influence decision-making

In the Finnish Transparency Register Act, lobbying refers to communicating with a lobbying target on one's own account with a view to influencing the preparation and decision-making in a matter by promoting a specific interest or objective.⁴

The influencing activities described in the Finnish Transparency Register Act can be referred to using multiple terms. The aim is to present them in an understandable and neutral manner.⁵ In English, the term "lobbying" is primarily used, but they may also be referred to as "representation of interests" or "influencer communications".⁶

A key feature of lobbying is the aim to get decision-makers to act in a manner that leads to decisions promoting the interests of the lobbyist and its interest groups. It is often a systematic activity that aims to build trust between lobbyists and decision-makers in the long term by establishing relationships.⁷



Lobbying is an integral part of the political system and democracy. The purpose of the Transparency Register is not to prevent lobbying but to increase its transparency.



The disclosure obligation increases transparency regarding who is lobbying whom, on what subject and by what method.

The intent and impact of lobbying are often difficult to prove.⁸ What is essential in the definition of lobbying is therefore communication between the decision-making or preparatory body and an actor with interests in the decision-making.

In connection with the Finnish Transparency Register, decision-making refers to both official decision-making and the related preparatory process as well as to any other matter under consideration, regardless of its content, processing stage or form. The concept of decision-making thus covers the whole process and does not necessarily involve a formal decision or a pending preparation process.⁹

1.2 The disclosure of lobbying activities has increased the openness of decision-making

The objective of the Finnish Transparency Register Act is to increase the openness of decision-making and to ensure transparent registration of long-term and systematic lobbying targeted at decision-making and of professional consultancy related to such lobbying.

Increased openness in decision-making can prevent inappropriate influencing of decision-making

Lobbying aims to influence societal decision-making or its preparation. The obligation to disclose lobbying to the Finnish Transparency Register applies to legal persons and private entrepreneurs engaged in lobbying or lobbying consultancy. The purpose of the disclosure obligation is to increase transparency regarding who is lobbying whom, on what subject and by what method.

Lobbying must be disclosed to the Finnish Transparency Register in order to make the background of decision-making transparent. Transparency of decision-making also prevents inappropriate influencing and promotes fair and equitable dialogue in society. The Register also supports decision-makers in gaining insight into the interests and perspectives of different actors during the preparatory process.

Changes in decision-making practices have reduced transparency and increased informal lobbying

The Finnish democracy has traditionally had a strong aspiration for consensus. This has resulted in a decision-making culture where public officials and politicians actively consult different stakeholders and seek to reconcile their views. While this decision-making culture based on consensus and different stakeholders' participation has been apt to strengthen

trust in political institutions and their actors, it has also created a strong lobbying culture which is based on negotiation and agreement practices and in which lobbying organisations play a strong role in directing decision-making.¹⁰

In Finland, stakeholder involvement has traditionally been relatively structured and regulated, taking place through tripartite preparation, broad-based working groups and consultation rounds. This has enabled various interest groups to participate systematically in societal decision-making. However, in addition to and alongside this, there have continuously been informal and network-based forms of cooperation. These informal meetings and forms of lobbying have increased and, in part, replaced traditional forms of formal preparation. This change has given more scope for individual actors' exertion of influence and blurred the boundary between the public and the private in the preparation and decision-making process.¹¹

This development is linked to the increasing occurrence of the revolving door phenomenon, the professionalisation of lobbying and the emergence of an influencer communications market. In a situation where the current government requires more networking and cooperation, the oversight of legality requires new regulation in order to ensure the transparency of decision-making and to strengthen the rules of interaction related to decision-making.

In Finland, the principle of openness under the Act on the Openness of Government Activities guarantees extensive transparency of administrative documents. However, decision-making is influenced far more widely at different stages of the decision-making process. Thus, the obligation to disclose information to the Transparency Register supplements Finland's legislation on public access to information and strengthens the principles of open administration, to which Finland is committed.

Regularly published information on lobbying shows that lobbying is an integral part of the democratic system. It may also dispel suspicions surrounding lobbying activities and reduce the negative perceptions associated with lobbying.

1.3 Lobbying targeted at Parliament and the ministries is reported to the Finnish Transparency Register

The scope of the Finnish Transparency Register was prepared carefully as the state's operations are spread across different types of organisations, and the areas influenced by the legislation are diverse. Based on international examples and recommendations, the scope of lobbying registers should cover legislative and executive powers as broadly as possible in order to avoid any obvious loopholes in the regulation. However, none of the international examples offered a direct solution to the scope of the Finnish Transparency Register.



The information in the Transparency Register supplements Finland's legislation on public access to information and strengthens the principle of open administration.

In Finland, three scope options were assessed in the preparation:

1. the central government as a whole
2. Parliament, the ministries and central government agencies
3. Parliament and the ministries.

In the consultation round held in connection with the legislative drafting, option 3 received the most support (83 out of 182 respondents) and was considered to provide the clearest and most manageable way to launch the Register.¹² The legislative drafting process thus concluded with the adoption of the option that was not only the most supported one but also the one with the narrowest scope of application.

In the scope selected, lobbying targets include Parliament and the ministries. This means that contacts aimed at influencing the staff of the ministries and Parliament must be disclosed to the Finnish Transparency Register, unless a legal exception applies.

In view of the integrity of the information in the Finnish Transparency Register, it is important that contacts with all actors at Parliament and ministries, regardless of their institutional status, fall within the scope of the Act. The preparatory work for the legislation showed that the most significant lobbying activities are directed at Parliament and the ministries. The current Transparency Register legislation provides public insight into the key lobbying targets at the central government level and the preparation and decision-making processes.¹³

Table 1: Lobbying targets are recorded in the Register with varying levels of detail, depending on their role.

Lobbying target	Recorded in the Finnish Transparency Register
Parliament	
Member of Parliament	By name
Secretary-General and Deputy Secretary-General of Parliament	By name
Parliamentary assistant	At parliamentary group level
Parliamentary group staff	At parliamentary group level
Other public official of the Parliamentary Office	At committee or department and unit level
Ministries	
Minister	By name
Special adviser to minister	By name
State Secretary of a ministry	By name
Permanent Under-Secretary, Permanent Secretary or Director-General of a ministry	By name
Rapporteur appointed by a ministry	By name
Other public official of a ministry	At department and unit level

The lobbying targets named in the Register are Members of Parliament, ministers, special advisers to ministers, state secretaries appointed for a minister's term of office, the Secretary-General or Deputy Secretary-General of Parliament, permanent secretaries, permanent under-secretaries and directors-general of the ministries or rapporteurs appointed by the ministries.

In the case of other public officials, the organisation, department and unit are disclosed to the Transparency Register. In the case of parliamentary assistants and the staff of the parliamentary groups, the parliamentary group they represent is disclosed.

2 Information to be disclosed to the Finnish Transparency Register

The Finnish Transparency Register is based on a disclosure procedure in which each actor submits the necessary disclosures directly to the Register. The different disclosure types are registration, disclosure of activities and possible deregistration. The responsibility for filing the different disclosures always rests with the discloser. In the disclosure procedure, the entity subject to the disclosure obligation does not have to wait for the registration authority's approval. The aim is to ensure that the registration procedure does not restrict or delay the start of lobbying activities and that reporting on lobbying is not delayed because of the authorities' activities.

2.1 Registration

The use of the Finnish Transparency Register starts by submitting a registration. An organisation must register with the Finnish Transparency Register if it contacts Parliament or a Ministry for lobbying purposes more than five times during a calendar year. If the lobbying is occasional and falls below the above threshold, registration is not required. The registration obligation begins when the organisation starts lobbying or when its lobbying is no longer small-scale (up to five contacts per year).

The registration is made in the service portal of the Finnish Transparency Register, which requires login using a personal method of strong identification, such as online banking codes or a mobile certificate. In addition, the discloser needs an authorisation to act on behalf of the organisation.

The registration must include the organisation's basic information, such as the business ID, company name and main line of business. In connection with the registration, organisations must also provide an overview of their activities and memberships in associations engaged in lobbying, such as Finnish and international umbrella associations.



The Finnish Transparency Register is based on a disclosure procedure in which each actor submits the necessary disclosures directly to the Register.



Figure 1: Information to be provided in the registration.

The first three months of 2024 were reserved for the registration of organisations that were already engaged in lobbying before the Act on Transparency Register entered into force. During this period, 793 registrations were submitted to the Register. Registrations submitted after the transition period were not subject to sanctions. After the transition period, the registration shall be submitted to the Transparency Register no later than the day on which lobbying or lobbying consultancy is started.

Once registered, organisations subject to the disclosure obligation are required to report their lobbying or lobbying consultancy by submitting a disclosure of activities every six months. In addition, entities subject to the disclosure obligation shall, without delay, notify the registration authority if there are changes in the basic information they have disclosed to the Register, if they permanently discontinue their lobbying or lobbying consultancy or if their lobbying activities become small-scale.

2.2 Disclosure of activities

The entities subject to the disclosure obligation report their lobbying or lobbying consultancy twice a year in a disclosure of activities. The reporting periods for which the information is provided are January–June and July–December. A registered entity must submit a disclosure of activities even if it has not carried out any lobbying or lobbying consultancy during that period.

The information for the previous reporting period is disclosed to the Register when the disclosure period is open in July–August and in January–February. Disclosures submitted after the end of the disclosure period are marked as late.

Starting from 2026, financial information on lobbying and lobbying consultancy must also be disclosed to the Register in the disclosure of activities submitted in July–August. The financial information always concerns the previous calendar year.

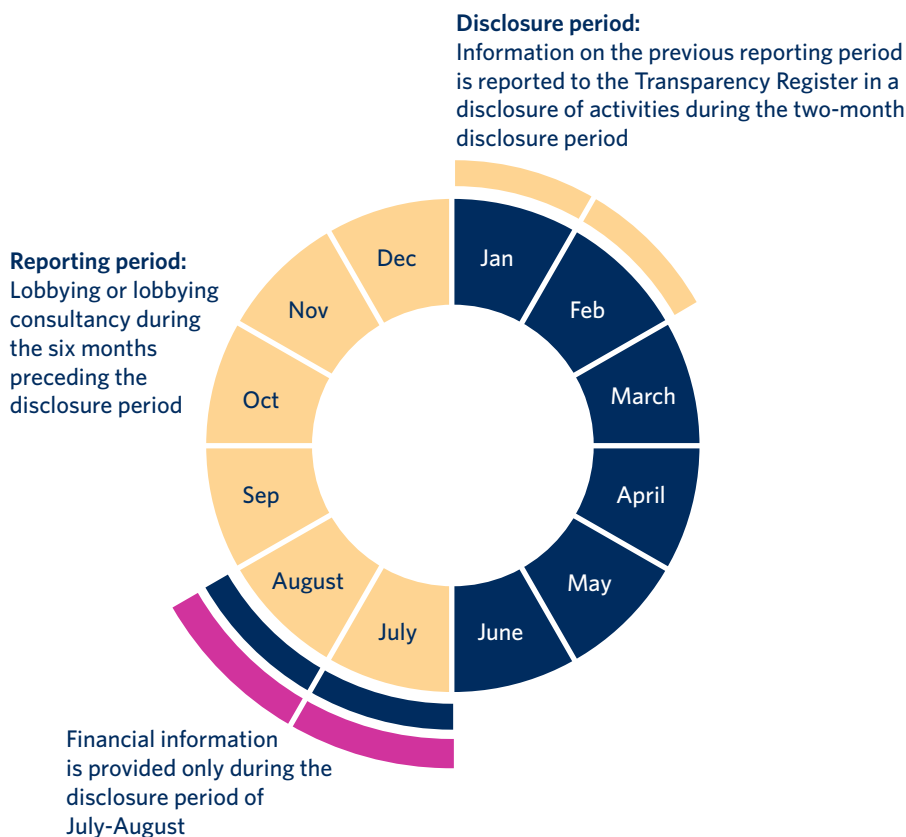


Figure 2: Annual clock of the Finnish Transparency Register starting from 2025. Financial information will be disclosed for the first time in 2026.

In 2024, when the Transparency Register entered into force, the period for which the lobbying activities were disclosed was exceptionally April–June instead of the regular six-month reporting period. For the reporting period April–June 2024, 1,003 disclosures of activities were submitted, and for the reporting period July–December 2024, 1,127 disclosures of activities were submitted.

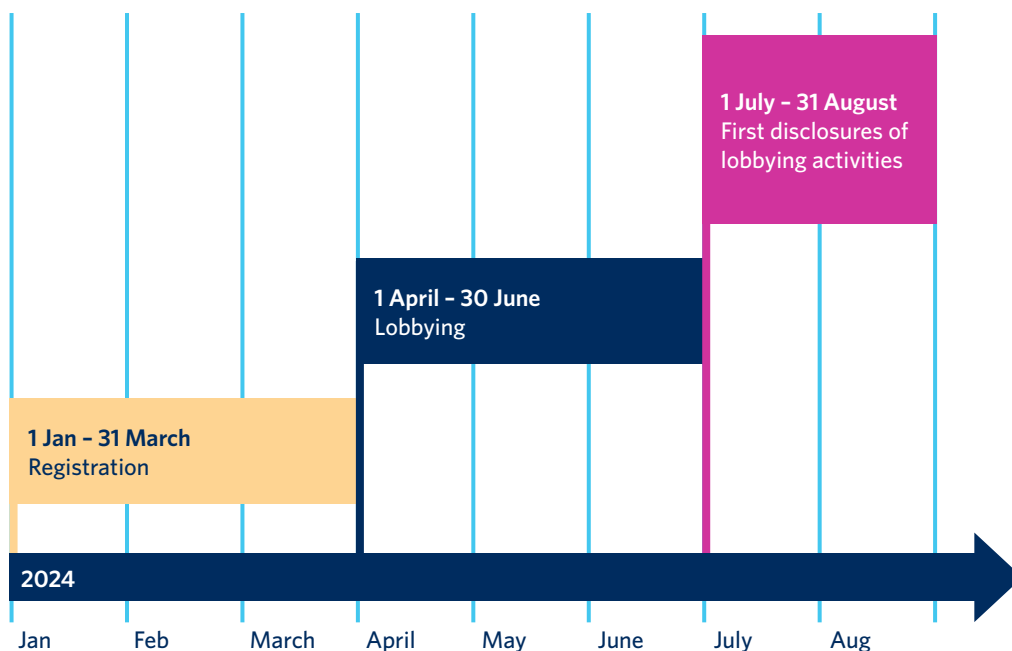


Figure 3: Timetable for the year of entry into force of the Finnish Transparency Register. The time allocated for registration shortened the first reporting period to three months.

Information to be disclosed on lobbying

In the disclosure of activities, organisations disclose the subjects of their lobbying directed at Parliament or the ministries, specify the lobbying targets and disclose the main methods of communication. The Finnish Transparency Register is not a meeting journal in which all meetings are recorded, but the activities are reported by subject.

The subjects of lobbying are added to the disclosure of activities one by one, either by describing them in a free-form manner or by referring to the project number of an official Government project. Under each subject, the discloser must report all persons contacted for lobbying purposes in relation to the subject.

Persons in significant decision-making positions are recorded in the Register by name (Members of Parliament, ministers, state secretaries appointed for ministers' term of office, special advisers to ministers, the Secretary-General and Deputy Secretary-General of Parliament, permanent secretaries, permanent under-secretaries and directors-general of ministries and rapporteurs appointed by ministries). Other individuals at Parliament and the ministries are disclosed by specifying the parliamentary group, committee or department and unit they belong to.

The main method of communication is selected for each target. The method of communication can be, for example, an email, a telephone call or a meeting. The Finnish Transparency Register does not show the number of contacts.

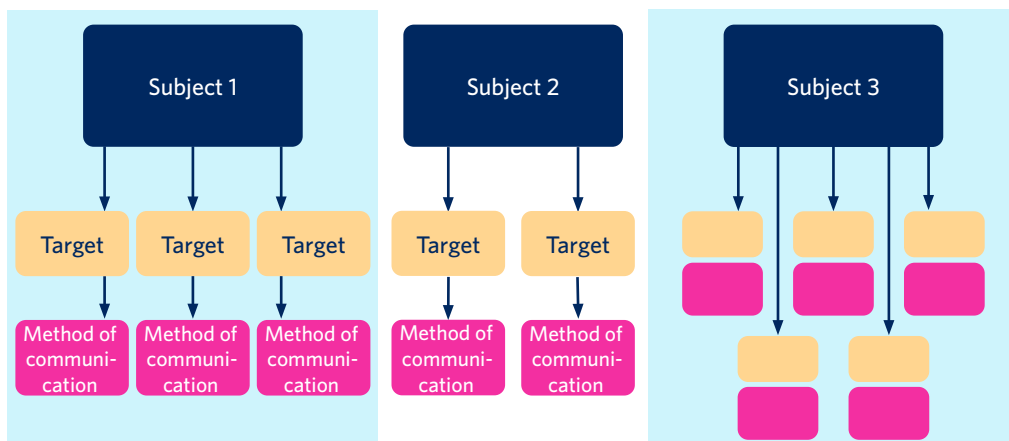


Figure 4: Lobbying activities are reported based on the subject. Information on lobbying targets and methods of communication is added to the subject.

Information to be disclosed on lobbying consultancy

Organisations engaged in professional lobbying consultancy have more extensive reporting obligations than other actors. In addition to direct lobbying, they must also report their other lobbying activities as follows:

1. **Lobbying consultancy:** In the disclosure of activities, an entity engaged in lobbying consultancy must disclose the client to whom the consultancy was provided, the subject of the consultancy and the nature of the support provided. The consultancy may include, for example, planning of the client's lobbying or communication, stakeholder surveys or other lobbying-related consultancy. The disclosure obligation also applies to services that are not formally defined as lobbying but in practice support the client's interests.
2. **Lobbying on behalf of a client:** When an entity engaged in lobbying consultancy carries out lobbying on behalf of a client, its disclosure of activities shall disclose the client, the subject of lobbying, the lobbying targets and the methods of communication used. This applies to activities where lobbying is carried out on behalf of or in cooperation with the client.
3. **Public relations activities of a provider of consultancy:** If an organisation maintains contact with lobbying targets without a customer relationship but to support its own consultancy activities (e.g. network building or information acquisition), this shall be disclosed in the disclosure of activities. Such contacts are a key part of the work of the actors in the sector and may resemble lobbying but serve their own business instead of serving directly their clients' interests.

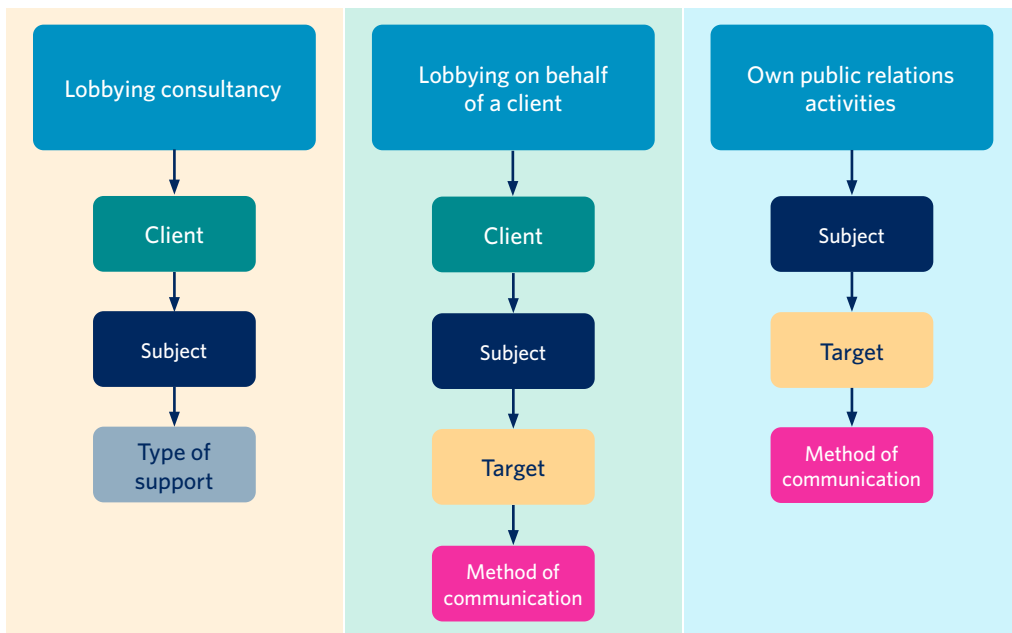


Figure 5: The information to be disclosed on lobbying consultancy varies depending on the type of activities.

Entities engaged in lobbying consultancy must be able to distinguish between the different forms of activities and identify situations in which a disclosure obligation under the Finnish Transparency Register arises.

Disclosing financial information

Starting from 2026, financial information related to lobbying and lobbying consultancy shall be disclosed to the Finnish Transparency Register once a year. The information is provided in the disclosure of activities submitted during the July–August disclosure period.

The financial information always concerns the previous calendar year. Thus, the financial information disclosed to the Transparency Register for the first time in July–August 2026 concerns lobbying or lobbying consultancy carried out in 2025.

The financial information disclosed on lobbying includes the total number of persons who have participated in lobbying and received a salary or other financial benefit and the FTEs (full-time equivalents) they have spent on lobbying activities.

In addition, the entity subject to the disclosure obligation must disclose the costs of outsourced lobbying consultancy during the previous calendar year and the lobbying-related marketing and representation costs during the previous calendar year. Marketing and representation costs are disclosed separately.

The information disclosed on lobbying consultancy is the turnover (in euros) from lobbying consultancy carried out in the previous calendar year.

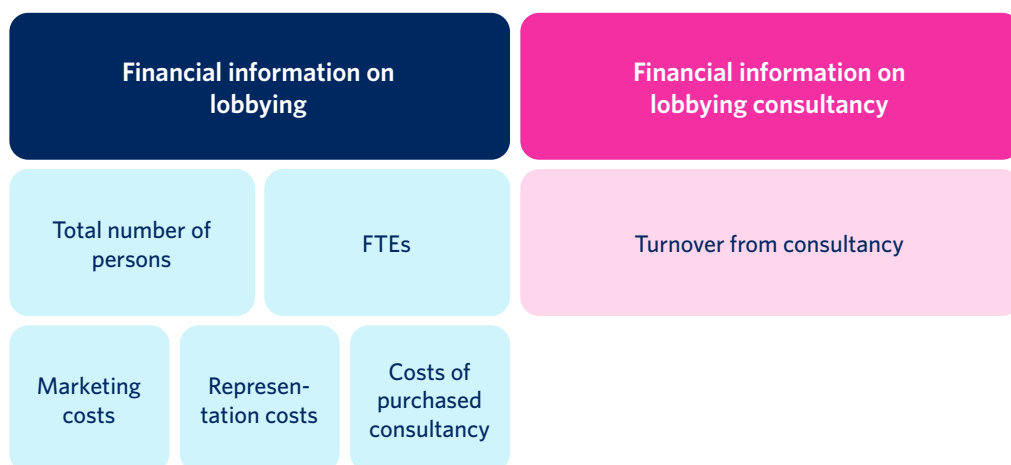


Figure 6: Financial information to be disclosed on lobbying and lobbying consultancy.

Regulation on the compilation and disclosure of financial information

Under the Finnish Transparency Register Act, the National Audit Office, as the registration authority, can issue more detailed regulations on how the financial information on lobbying and lobbying consultancy shall be compiled.¹⁴

On 13 December 2024, the National Audit Office issued a regulation on the compilation of financial information on lobbying as referred to in the Finnish Transparency Register Act. The purpose of the Regulation is to specify, within the scope of the authorisation to issue provisions granted to the registration authority, the information required for the compilation of financial information.

The National Audit Office prepared a draft regulation in autumn 2024. Before the final regulation was prepared, the draft was circulated for comments in the Lausuntopalvelu service, where it was possible to give feedback on the draft. The National Audit Office received a total of 91 opinions. These opinions were provided by small non-governmental organisations, various umbrella and lobbying organisations, limited liability companies and researchers.

The feedback received on the draft regulation was fairly consistent despite the heterogeneity of respondents. The respondents found the model proposed in the draft regulation administratively very heavy. The respondents also pointed out that the proposed reporting method and the collection of the proposed information would be impossible for them to implement.

The objective of the consultation round is to produce high-quality regulation and to provide the authority with advance insight into how its draft regulation is received. The Government proposal on the Finnish Transparency Register¹⁵ states that reporting to the Finnish Transparency Register should be administratively as lightweight as possible, while ensuring the comparability of the reported information.

The National Audit Office decided to amend the regulation on financial information based on the feedback received. The regulation was amended, among other things, in such a manner that, instead of exact figures, many of the data items to be reported are disclosed in different ranges. In addition, the explanatory memorandum on the regulation was made more informative.

2.3 Deregistration

If an entity subject to the disclosure obligation ends its lobbying and lobbying consultancy activities permanently or if its lobbying becomes a small-scale activity, a deregistration shall be submitted to the Finnish Transparency Register. The obligation to disclose information to the Transparency Register ends once the entity has deregistered.

An organisation can only submit a notification of becoming a small-scale lobbyist if it has not exceeded the threshold for small-scale lobbying during the calendar year in question. Small-scale lobbying is defined as no more than five contacts with lobbying targets per calendar year. An organisation cannot deregister as a small-scale actor in the middle of the year if the volume of its lobbying has already exceeded the threshold for small-scale lobbying during that year.

The deregistration is submitted in the service portal of the Transparency Register. Before the deregistration, the discloser shall complete all its outstanding Transparency Register obligations accumulated by the deregistration date. This means that the discloser shall submit any outstanding disclosures of activities and provide all financial information for the preceding calendar year.

After the deregistration has been published, the details of the discloser are not removed from the Transparency Register but the information is updated by stating that the organisation has left the Register.

3 Advisory Board

The Finnish Transparency Register Act provides for an Advisory Board that serves as a co-operation body for stakeholders relevant to the Act.¹⁶ The provision related to the Advisory Board entered into force in the spring of 2023 before the Finnish Transparency Register Act entered into force.

The Advisory Board of the Finnish Transparency Register is independent of the National Audit Office. It has an advisory role and does not exercise public authority. The purpose of the Advisory Board is to:

- monitor the operation of the Finnish Transparency Register
- take initiatives to develop the operation of the Register
- act as the official cooperation body for stakeholders
- draw up and maintain recommendations on good lobbying practice.

Since the Finnish Transparency Register Act entered into force, the Advisory Board has acted in accordance with its role. Initially, the Advisory Board focused on ensuring the commitment of the stakeholders falling within the scope of the Act to implementing and monitoring the Act and on promoting a good lobbying culture. Through a continuous dialogue with representatives of the Advisory Board, the National Audit Office has also received valuable feedback on the stakeholders' views and, for example, an opinion on the draft regulation on financial information.

The Advisory Board is appointed for a term of three years at a time and always includes representatives of the entities subject to the disclosure obligation as well as researchers and public authorities with relevant expertise. The Prime Minister's Office, the Ministry of Justice, the Ministry of Finance and the National Audit Office are permanently represented on the Advisory Board.

3.1 Recommendations for good lobbying practice

In 2024, a key task of the Advisory Board was to draw up recommendations promoting a good lobbying culture. For the preparatory work, it set up a sub-group and organised a hearing for stakeholders. The recommendations were completed in summer 2024.



In 2024, a key task of the Advisory Board was to draw up recommendations promoting a good lobbying culture.

Recommendations for good lobbying practice

1. We respect the democratic decision-making process.
2. We act in an honest and respectful manner.
3. We openly disclose for whom we are working and what interests we are promoting.
4. We openly disclose our interests.
5. We respect confidentiality.
6. We observe the rules of hospitality.

The recommendations are based on the principles of self-regulation and encourage actors carrying out lobbying to adhere to responsible practices. Organisations can notify the National Audit Office of their commitment to the good lobbying practices defined in the recommendations, in which case the National Audit Office adds the organisation to the list it maintains of actors committed to the recommendations. The information on the commitment will later be added directly to the organisation's registration.

At the time of writing the annual report, 141 organisations engaged in various forms of lobbying or lobbying consultancy have publicly committed to the recommendations. The complete recommendations and an up-to-date list of organisations committed to good lobbying practice can be found on the online service of the Finnish Transparency Register (avoimuusrekisteri.fi).

4 Tasks of the registration authority

The National Audit Office acts as the registrar of the Finnish Transparency Register.¹⁷ As the registrar, the NAOF maintains an electronic register, oversees compliance with the disclosure obligation, and provides guidance and advice for the actors subject to the disclosure obligation in the fulfilment of their statutory obligations. It also appoints an Advisory Board for the Transparency Register and reports on the operation of the Transparency Register in an annual report and in a report submitted to Parliament once during a parliamentary term.

4.1 Provision of guidance and advice

A key task, particularly in the year when the Finnish Transparency Register Act entered into force, has been providing guidance and advice for the entities subject to the disclosure obligation, which is also a statutory duty of the registration authority.¹⁸ The extensive guidance and advisory task aims to ensure that all entities subject to the disclosure obligation meet their disclosure obligations and to minimise non-compliance due to misunderstanding, non-intention or carelessness.

According to the preparatory works of the Act, in view of the objectives of the Finnish Transparency Register and the extent of its scope, the guidance and advisory task will play an important role in the registration authority's activities. The National Audit Office's Transparency Register experts have fulfilled their advisory and guidance responsibilities in a variety of ways. They have observed that in the early stage of the Register, a considerable number of those subject to the disclosure obligation required some level of advice and guidance in order to meet their obligations.

In order to meet the needs of disclosers, the Transparency Register experts organised training and participated in all events to which they were invited to present the new legislation. In 2023, before the Finnish Transparency Register Act entered into force, the Transparency Register experts organised a total of 14 training sessions and webinars, participated as speakers in 23 different events and met stakeholders in Teams meetings, reaching an audience of over 1,600.

Active presentation of the new legislation continued in 2024 when the Transparency Register experts organised 22 training sessions and webinars, participated in 20 different events and met stakeholders in Teams meetings, reaching an audience of around 1,300. In



A key task in the year when the Finnish Transparency Register Act entered into force was providing guidance and advice for the disclosers.

In addition, the Transparency Register experts organised 19 low-threshold “disclosure clinics”, where disclosers could receive individual guidance and advice on both substantive and technical questions.

Table 2: The Transparency Register experts presented the new legislation on the Finnish Transparency Register at various events.

Year	Training sessions and webinars	Visits as speakers	Teams meetings	Total audience
2023	14	23	16	Approx. 1 600
2024	22	20	14	Approx. 1 300

Outside these events, the Transparency Register experts have been available daily by email and telephone for all matters related to the Finnish Transparency Register. Information has also been provided on the Finnish Transparency Register website, in the regularly published newsletters and on social media.

Provision of information to lobbying targets

In 2024, the activities of the Finnish Transparency Register also included providing information and guidance to lobbying targets. Although the Finnish Transparency Register Act does not require measures from lobbying targets, the legislation applies to all persons working at the ministries and Parliament. A key priority has been to inform those lobbying targets who are recorded in the Transparency Register by name.

The Transparency Register does not directly affect the work of lobbying targets but may require clarification of the existing stakeholder cooperation and hearing procedures. The principle of transparency also highlights the need to take equality into account in stakeholder cooperation.

It is essential to recognise that, as regards lobbying targets, only information on the role or position of these decision-makers is disclosed to the Transparency Register. The information to be disclosed to the Register on lobbying targets does not include information related to their private life or other roles in society, such as their duties as municipal politicians or their positions of trust.

4.2 Communications of the Finnish Transparency Register

An essential part of the advisory and guidance work is diverse and up-to-date communications, which the Transparency Register has sought to maintain throughout the year. The communications activities have been planned to support either the entities subject to the disclosure obligation or the objectives of the Register.

The focus of communications in 2024 was on familiarising especially those subject to the disclosure obligation with the Register and the new legislation. By raising awareness, the aim has been to ensure more complete compliance with the disclosure obligation and

thereby more comprehensive achievement of the objectives of the Register. The aim has also been to provide citizens with general information about the Transparency Register.

The most important communications channel of the Transparency Register is its online service avoimuusrekisteri.fi. The general public has found the online service well, and many people have been particularly interested in the first disclosure period. On the last working day of the disclosure period, 30 August 2024, the service recorded more than 1,060 unique visitors and well over 8,000 page views. Other traffic spikes were recorded on 2 January 2024, the first business day following the launch of the Transparency Register, and on 28 March 2024, the last day of the transition period reserved for registrations. The most popular content in the service has been the disclosures submitted to the Register and the guidance provided, for example, on the activities to be reported to the Transparency Register.

The Finnish Transparency Register received considerable media coverage in its first year of operation. Five press releases were issued on the operation of the Transparency Register. In early 2024, the National Audit Office organised an event for journalists on the new Transparency Register Act, with the aim of presenting the information available from the Register.

Six newsletters of the Finnish Transparency Register were sent in 2024. The aim of the newsletters is to keep the entities subject to the disclosure obligation, stakeholders and others interested in the Transparency Register up to date on the Register's operation and content. In 2024, the newsletter also informed readers about the opinion of the Advisory Board of the Transparency Register on the regulation concerning financial information as well as about the recommendations on good lobbying practice.

An Instagram account was opened for the Finnish Transparency Register with the primary objective of increasing awareness of the new legislation and increasing the number of registered actors. The secondary objectives of the Instagram account are to raise awareness of the Finnish Transparency Register Act and its objectives as well as of lobbying.



Figure 7: Instagram posts of the Finnish Transparency Register. The account features, for example, reminders, topical highlights and informational posts.

In summer 2024, the Finnish Transparency Register was also represented in SuomiAreena, where the National Audit Office organised a panel discussion titled “Will decision-making improve when lobbyists are revealed?”. In addition to those present at the venue, 170 people followed the discussion online via livestream. In addition to the panel discussion, the Finnish Transparency Register experts were present at the Citizens’ Square to provide information about the Finnish Transparency Register to those subject to the disclosure obligation, lobbying targets and the general public.

4.3 Costs of maintaining and developing the Finnish Transparency Register

The Finnish Transparency Register generates both one-off and ongoing costs, the most significant of which have been related to the competitive tendering and building of the online service of the Transparency Register. One-off costs have therefore played a prominent role due to the procurements made during the implementation phase of the Transparency Register. Ongoing costs related to the Transparency Register arise particularly from the maintenance of the online service and from personnel expenses.

Avoimuusrekisteri.fi online service

The Transparency Register’s online service consists of three parts: a public website open for anyone, a service portal for the entities subject to the disclosure obligation and the registrar’s maintenance environment. Those subject to the disclosure obligation submit their disclosures via the online service, which requires strong identification. When the disclosures have been published, anyone can view them in the public online service at avoimuusrekisteri.fi.

In the online service, the information in the Transparency Register can be searched by organisation, lobbying target, disclosure period or other desired search criteria. In addition, the online service provides researchers and journalists with open and machine-readable data on lobbying activities to facilitate information gathering.

The system provider that implemented the Transparency Register was procured through a public tender at the turn of 2022–2023. The selected provider was Ambientia Oy, which became HiQ Public Oy in 2024 following a corporate acquisition.

The functionalities of the service were divided into sections, and the building began in phases in 2023. The phased implementation ensured that the functions necessary at each phase were completed in time to meet the schedule dictated by the entry into force of the Finnish Transparency Register Act.



Ongoing costs related to the Transparency Register arise particularly from the maintenance of the online service and from personnel expenses.

The main target of the National Audit Office and the system provider for 2024 was to complete a service package that enables the submission of disclosures in accordance with the Finnish Transparency Register Act and provides sufficient tools for the registrar. Most of the working hours were spent on achieving this target, but there was also time to carry out other system maintenance and further development.

The purpose of the system maintenance and further development is to make the Finnish Transparency Register as functional and user-friendly as possible. User experiences and feedback have been collected through free-form channels as well as surveys sent with the newsletter. Based on the feedback, technical improvements have been made to the system, and the guidelines have been clarified.

Budgetary impacts of the Register

An appropriation of EUR 500,000 was allocated to the National Audit Office for the Transparency Register task to cover the procurement costs of the electronic system. The appropriation covered the specification and development work carried out by the external system provider (about EUR 350,000–400,000) and the costs of the project manager (about EUR 100,000–150,000). The appropriation was transferred to the National Audit Office in the supplementary budget procedure.

In addition to the above-mentioned one-off costs, the Transparency Register generates ongoing costs, including the operating costs of the electronic service and the costs arising from registrar duties. The ongoing costs have been taken into account in the National Audit Office's operational and financial plan for 2022–2025 as from 2023. The annual costs of the Transparency Register are estimated to amount to around EUR 220,000, of which EUR 180,000 are the staff's salary costs and EUR 40,000 are annual information system costs.

Costs of the Finnish Transparency Register 2022–2024

The preparation and start-up phase of the project took two years before the first actual year of operation of the Finnish Transparency Register. During this period, both external and internal costs were incurred, for example, from planning, system development and other preparatory work associated with the entry into force of the Act.

The planning of the Finnish Transparency Register began at the National Audit Office in 2022 with preliminary research and the competitive tendering of expert consultancy services. External input was needed, for example, for drawing up the requirements specification, supporting the competitive tendering of the information system and providing expertise in contract law.

In 2022, around EUR 63,000 was spent on service purchases, and around 0.72 FTE of internal working time was dedicated to the preparation. Costs were caused particularly by the requirements specification for the information system and the preparation of the procurement contract.

In 2023, the preparatory work expanded to the actual development phase. Around EUR 72,000 was spent on service purchases. Costs were caused particularly by the preparation of the information system procurement and the preparation of communications. After the



Finland is the first Nordic country to have enacted an act on a transparency register.

Act entered into force, the National Audit Office's own staff participated more extensively in the work, and the labour input used for the Transparency Register increased to approximately 2.75 FTEs.

In 2024, the focus shifted to testing the online service and the introduction of the system. Approximately EUR 16,000 was spent on service purchases, most of which was due to the costs of communications and event arrangements. The NAOF's own labour input in 2024 amounted to around 3.0 FTEs.

The largest costs were caused by the building of the online service. The maintenance costs of the Avoimuusrekisteri.fi online service amounted in 2023 to about EUR 27,000 and in 2024 to about EUR 55,000.

The costs of building the system amounted in 2023 to EUR 202,800 and in 2024 to about EUR 114,000. In the first two years, about EUR 317,000 has thus been spent on the building of the system. The last system building costs will be realised only in 2025, as will also some of the additional work and further development.

4.4 International and domestic cooperation

Finland is the first Nordic country to have enacted an act on a transparency register. A total of 17 member countries of the Organisation for Economic Co-operation and Development (OECD) have regulation concerning lobbying. Finland's model is quite ambitious by international standards, which has generated steady and consistent interest in our new legislation.

The National Audit Office has cooperated with the authorities of other countries as part of the European Lobbying Registrars' Network (ELRN) and the OECD's Lobbying Commissioners, Registrars, and Oversight Entities network. The task of the ELRN is to bring together European registrars of transparency registers and oversight authorities. In 2024, the ELRN included government authorities from 13 countries.

The aim of the cooperation groups is to strengthen international cooperation between the oversight authorities and to help the authorities to develop their own registers and the usability and integrity of the information available from them.

In the year when the Finnish Transparency Register Act entered into force, the National Audit Office also cooperated with other authorities in Finland. When building the Transparency Register system and drawing up guidelines for its use, the National Audit Office cooperated with the Office of the Data Protection Ombudsman, the Finnish Tax Administration and the Digital and Population Data Services Agency. In addition, the maintenance of the Transparency Register system requires regular cooperation with all ministries in order to maintain up-to-date information on lobbying targets in the Register.

5 Observations of the maintenance and oversight of the Finnish Transparency Register for 2024

The maintenance and oversight of the Finnish Transparency Register ensures that the entities engaged in lobbying comply with their disclosure obligations and act in accordance with the Finnish Transparency Register Act. Up-to-date information in the Register, the comprehensiveness of disclosures and the reliability of information are key prerequisites for the system's functionality and for enhancing the transparency of decision-making. The oversight has focused on providing guidance and advice, but the oversight authority also has the possibility of imposing a penalty payment.

5.1 Maintenance of the Finnish Transparency Register

The maintenance of the Finnish Transparency Register includes the system's technical functionality and user-friendliness, which enable smooth and up-to-date reporting. Registrations, semi-annual disclosures of activities and, if necessary, deregistrations are continuously submitted to the Register. Starting from 2026, registered organisations will also report financial information on their lobbying once a year. All disclosures can be submitted centrally on the online service of the Transparency Register.

In 2024, 1,113 organisations registered with the Finnish Transparency Register, and during the two reporting periods, a total of 2,130 disclosures of activities concerning 2024 were submitted.

Registration of lobbying and lobbying consultancy started on 1 January 2024

The first real test for the new Transparency Register system was the start of the registration period on 1 January 2024. The system was immediately able to receive registrations, and the first registration was published six minutes after the start of the registration period at 0:06 am.¹⁹



The first real test for the new Transparency Register system was the start of the registration period on 1 January 2024.

In 2024, a total of 1,113 registrations were submitted to the system. The first three months were reserved for the registration of organisations that were already engaged in lobbying or lobbying consultancy before the Act on Transparency Register entered into force. Of all registrations in 2024, 793, or 71%, were submitted during the period reserved for submitting registrations.

Seven of the registrations were made by foreign organisations. The system was thus also able to receive registrations from organisations operating under foreign business identifiers.

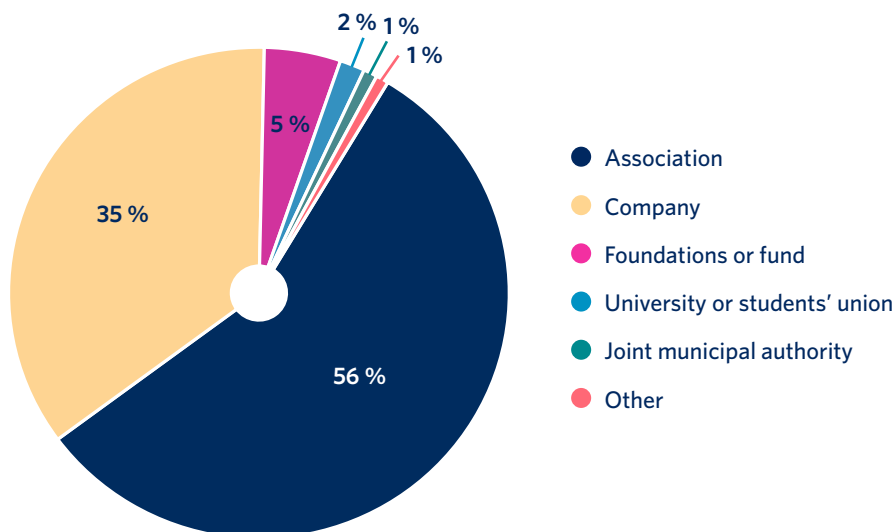


Figure 8: Organisation forms of the organisations registered in the Finnish Transparency Register in 2024.

A total of 2,130 disclosures of activities were submitted during the two disclosure periods

The first disclosure period, during which lobbying or lobbying consultancy carried out between 1 April and 30 June 2024 was reported, was from July to August. For technical reasons, the disclosure period opened approximately 23 minutes late, but the first disclosure of activities was nevertheless published successfully as early as at 1:07 am on 1 July 2024.

A total of 1,003 organisations reported on their lobbying activities during the disclosure period. Of the disclosures of activities, 797 were submitted on time, while about 21% were submitted late. A request letter was sent to 24 entities subject to the disclosure obligation. All entities subject to the disclosure obligation submitted their missing disclosures by the beginning of the following disclosure period.

The second disclosure period, during which lobbying or lobbying consultancy carried out between 1 July and 31 December 2024 was reported, was from January to February 2025. During this period, a total of 1,127 organisations reported on their activities. Of the disclosures of activities, 944 were submitted on time, while about 16% of them were submitted late. A request letter was sent to 107 entities subject to the disclosure obligation.

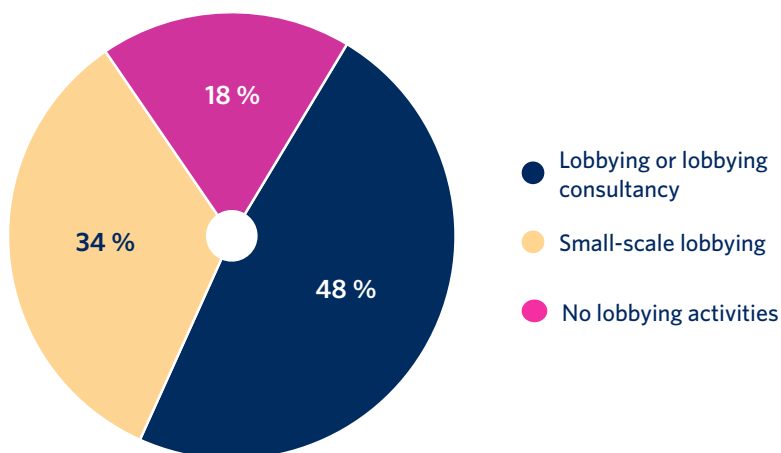


Figure 9: Scopes of lobbying activities reported in the disclosures of activities for 2024.



Figure 10: Methods of communication between lobbying targets and entities subject to the disclosure obligation, illustrated with circles sized proportionally to their frequency of occurrence in disclosures of activities.

The Finnish Transparency Register shows the lobbying targets

In 2024, the Finnish Transparency Register included about 824 lobbying targets as referred to in the Finnish Transparency Register Act. Of these, 695 were reported in the disclosures of activities to have been lobbied. Most lobbying activities were reported to have been directed at Matias Marttinen, Member of Parliament, Sari Essayah, Minister of Agriculture and Forestry, and Kai Mykkänen, Minister of Climate and the Environment.

Table 3: Lobbying targets most frequently named in disclosures of activities in 2024.

Lobbying targets mentioned most frequently in the disclosures of activities in 2024	
410 mentions	Member of Parliament Matias Marttinen
391 mentions	Minister of Agriculture and Forestry Sari Essayah
352 mentions	Minister of Climate and the Environment Kai Mykkänen
336 mentions	Member of Parliament Inka Hopsu
322 mentions	Prime Minister Petteri Orpo
319 mentions	Special Adviser Lydia Ylönen
314 mentions	Minister of Education Anders Adlercreutz
306 mentions	Member of Parliament Saara-Sofia Sirén
297 mentions	Member of Parliament Mari-Leena Talvitie
289 mentions	Member of Parliament Mika Lintilä

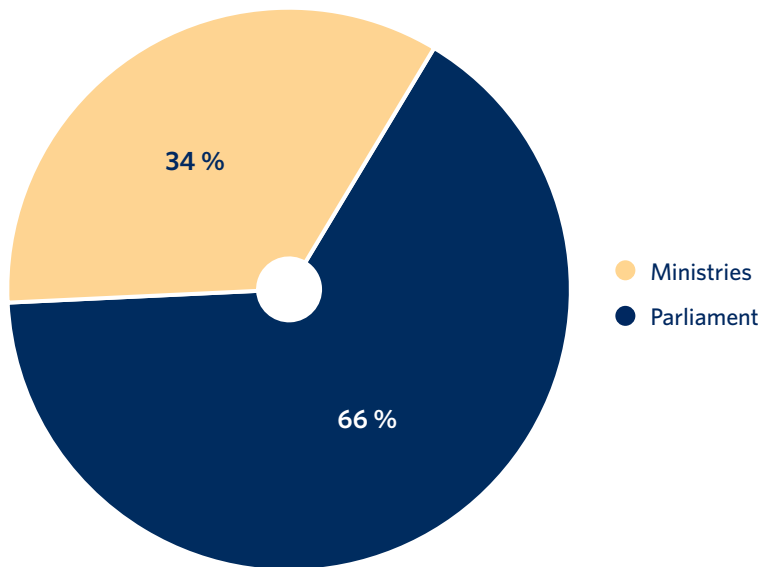


Figure 11: Breakdown of lobbying targets mentioned in the disclosures of activities by location: Parliament and ministries.

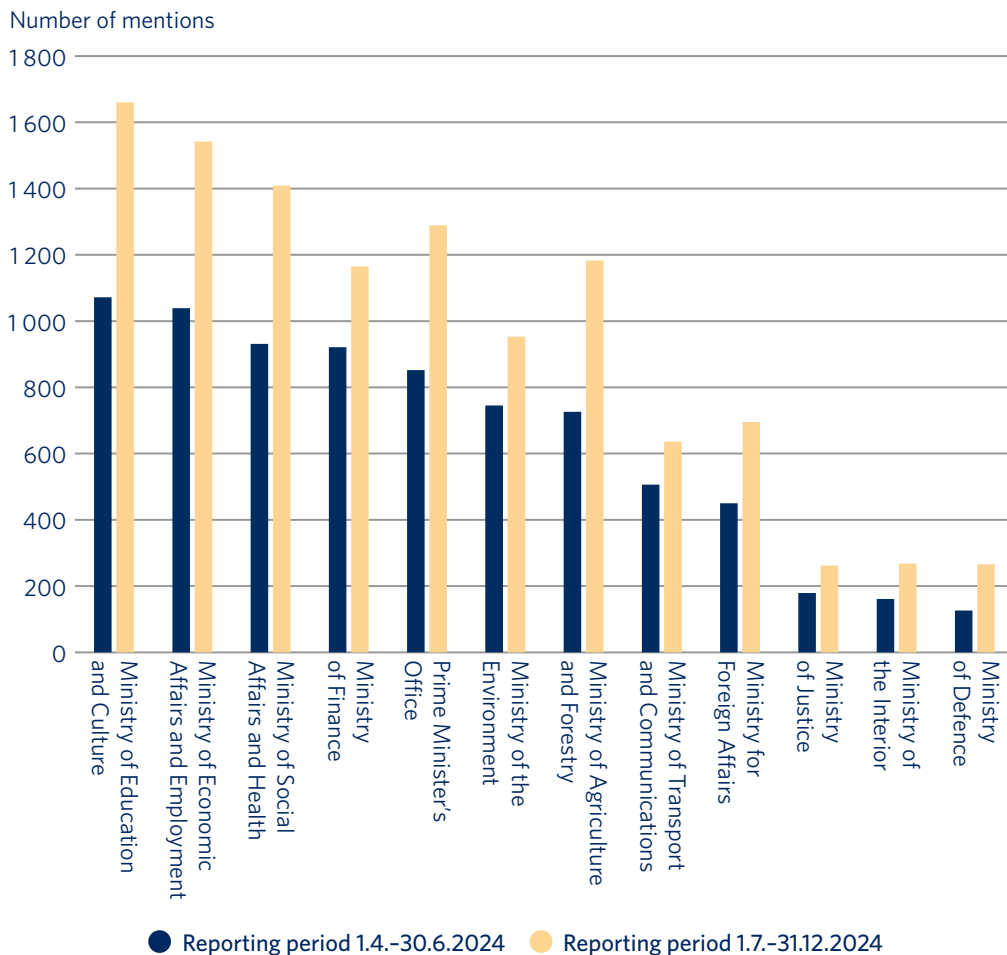


Figure 12: Lobbying targets mentioned in disclosures of activities by ministry.

16 deregistrations were submitted in the first year of operation

In 2024, 16 deregistrations were submitted, nine of which were due to the lobbying activities becoming small-scale and seven to their permanent discontinuation. In the year when the Act entered into force, the main reason for deregistrations was unnecessary registration.

5.2 Oversight of the Finnish Transparency Register

Oversight of the Finnish Transparency Register ensures that the entities subject to the disclosure obligation fulfil their statutory obligations. The oversight is directed at compliance with the registration and disclosure obligation and the correctness of the disclosed information.



Oversight of the Finnish Transparency Register ensures that the entities subject to the disclosure obligation fulfil their statutory obligations.

Oversight process

The registration authority of the Finnish Transparency Register is responsible for verifying that the registered organisations report on their lobbying or lobbying consultancy regularly and that the organisations leaving the Register fulfil the criteria laid down in the law.

The registration authority is also responsible for investigating suspected non-compliance with the disclosure obligation. Where necessary, the registration authority requests disclosers to submit a new disclosure, supplement a disclosure already submitted or provide information to help investigate the suspected non-compliance.

In order to verify this information, the registration authority has, under the Finnish Transparency Register Act, the right to obtain information, which means that, notwithstanding secrecy provisions, an entity subject to the disclosure obligation shall provide the oversight authority, i.e. the National Audit Office, with the information it needs.

If the National Audit Office suspects non-compliance related to a registration or disclosure of activities, it will first make a decision to take the matter under review. Suspected cases of non-compliance may come to the attention of the National Audit Office through its own oversight activities, random sampling, external tips or matters raised in public.

The National Audit Office starts investigating suspected non-compliance by sending a request for clarification to the discloser, in which case the discloser must provide the information necessary to clarify the suspected non-compliance. If necessary, the National Audit Office may follow up the request with a formal request to comply.

The National Audit Office may also approach the lobbying target during the oversight process if the clarification provided by the discloser is insufficient. In this case, the target of the suspected lobbying shall provide information on the communication in order to clarify the suspected non-compliance.

However, a clarification is not always necessary if it is evident that the actor has been aware of their obligation and, despite this, has failed to comply with it. In this case, the National Audit Office may proceed directly to requesting the discloser formally to submit a new disclosure or to supplement a disclosure already submitted. Before issuing a formal request to comply, the National Audit Office gives the actor concerned an opportunity to be heard by sending a request for an opinion, to which responding is voluntary.

In connection with requests for clarification and opinions, the actor concerned is given the opportunity to supplement the information it has submitted to the Finnish Transparency Register. The oversight is discontinued if the outcome of the process is that the deficiencies or errors detected have been corrected in the Transparency Register. If a deficiency or error is not corrected and the National Audit Office has determined that non-compliance has occurred, it issues a formal request to comply, requesting the discloser to take corrective actions by a specified deadline.

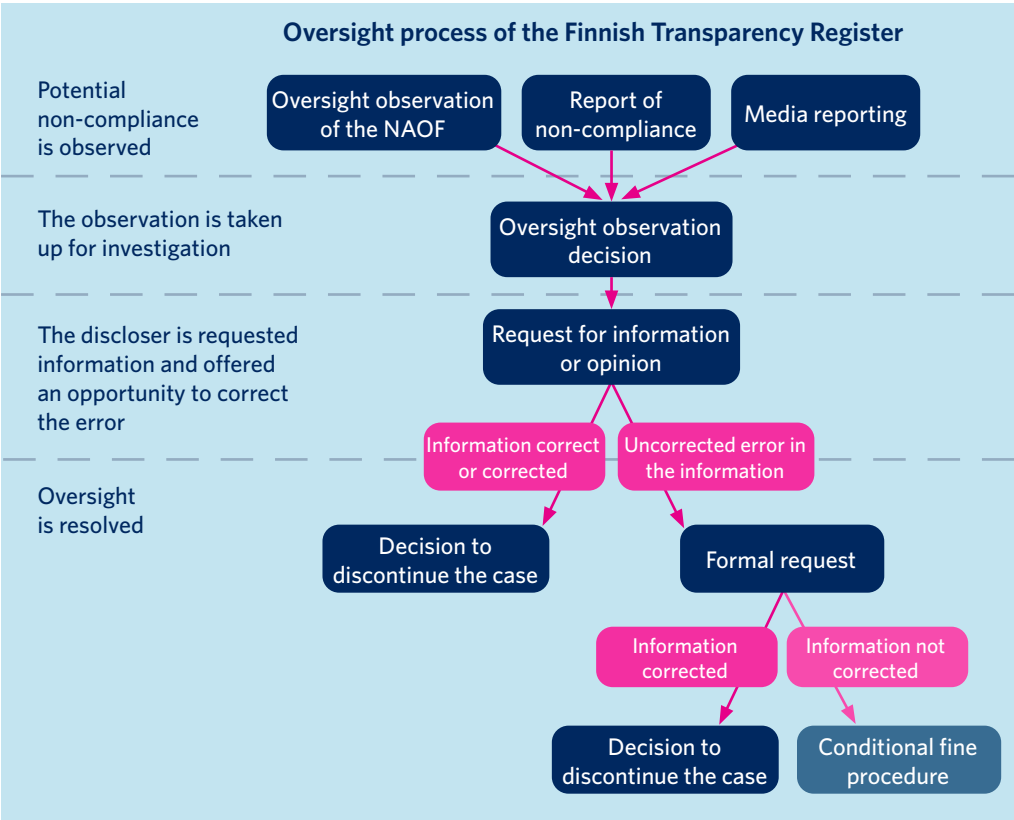


Figure 13: Typical progress of the oversight of the Finnish Transparency Register.

A penalty payment may be imposed to reinforce the oversight

If necessary, the National Audit Office may impose a penalty payment to reinforce the request to comply in cases where the discloser, despite the request, fails to submit a registration or disclosure of activities or correct the errors or deficiencies detected in their registration or disclosure, or refuses to provide the information requested to clarify the non-compliance. Requests to comply that have been reinforced with a penalty payment are published in the Finnish Transparency Register under the public list of penalty payment procedures. The objective of publishing the requests is to strengthen the oversight and promote compliance with the obligations. No penalty payments were imposed in the first year of operation of the Transparency Register.

The penalty payment procedure safeguards the operation and reliability of the Register, which can be considered particularly important from the perspective of strengthening trust in the political system. Before the penalty payment procedure is initiated, the entity subject to the disclosure obligation has the opportunity to sufficiently assess the nature of its activities and receive guidance and advice to help it meet its obligations.

5.3 Oversight findings for the first year of operation

As the Finnish Transparency Register Act entered into force only on 1 January 2024, the oversight has focused on providing guidance and advice for the entities subject to the disclosure obligation. The aim has been to ensure that, especially in the initial phase, the entities subject to the disclosure obligation receive the guidance and advisory service they need in order to fulfil their new reporting obligations. The objective is to prevent cases of non-compliance that involve elements of misunderstanding, non-intention or carelessness.

Early-year oversight findings focused on registrations

As the first disclosures of activities were submitted to the Finnish Transparency Register only when the disclosure period opened in July 2024, the oversight focused initially on registrations. The Transparency Register experts made two registration-related oversight findings that were taken up for further examination.²⁰ These oversight findings were related to disclosed information that was suspected to be incorrect, particularly regarding memberships in associations engaged in lobbying. Following the requests for clarifications and opinions sent to the disclosers²¹, the disclosers corrected the incorrect information in their registrations, after which the oversight was discontinued²², and there was no need for a formal request-to-comply process.

In 2024, the National Audit Office also made two other oversight findings related to registrations.²³ In these cases, it was suspected that the information contained in the registration was incorrect and that incorrect information had been deliberately submitted to the Register. The National Audit Office decided to hide these registrations from the public user interface of the Finnish Transparency Register already during the investigation.²⁴ In the investigation of the suspected cases of non-compliance, it was found that, in fact, the entities that had submitted the registrations had not carried out any lobbying activities. In addition, the registrations were considered to include inappropriate language use. Based on the information and opinions received in these cases, the National Audit Office decided to remove the registrations from the Transparency Register.²⁵

The above cases show that there may also be actors who utilise the disclosure procedure of the Register to deliberately publish incorrect information or even inappropriate content in the Register maintained by a public authority. Registrations are published in the Finnish Transparency Register without the registrar's separate approval. The development of the oversight tools has strived to respond to this.

In the Government proposal for a Finnish Transparency Register Act (HE 98/2022), such activities were considered to possibly fulfil the criteria for a punishable registration offence²⁶ or the provision of a false testimony to a public authority²⁷, as defined in the Criminal Code. In such cases, the responsibility for investigating the criminal matter lies with the police authority. Therefore, the National Audit Office reported the two registrations that were removed from the Register to the police.²⁸

A large number of disclosures of activities were filed late

One of the oversight duties of the registration authority is to verify that the actors subject to the disclosure obligation have submitted their disclosures of activities in a timely manner and in the correct format. During both disclosure periods, the experts of the Finnish Transparency Register sought to guide and advise disclosers to submit their disclosures of activities during the disclosure period. The actors subject to the disclosure obligation were reminded by email reminders and via newsletters, the website and social media.

The most popular times for submitting disclosures of activities were the last working days of the disclosure periods, i.e. 30 August 2024 and 28 February 2025. Many disclosers thus leave their submissions to the very last moment. There were also a large number of late disclosures. As many as 21% of the disclosures of activities submitted during the first disclosure period and 16% of the disclosures submitted during the second disclosure period were submitted late.

During the first disclosure period, the experts of the Finnish Transparency Register first contacted all entities with overdue disclosures by e-mail to provide further guidance on disclosures and obligations. A formal request to submit the missing disclosure of activities was sent to the entities subject to the disclosure obligation only when the disclosure was still missing despite several email reminders.

During the second disclosure period, the oversight of late disclosures was intensified, and entities with overdue disclosures were sent a formal request to comply immediately after the expiry of the disclosure period. Therefore, the number of request letters differs significantly between the two disclosure periods.

Table 4: Receipt of disclosures of activities in 2024 and reminders sent to late disclosers.

Reporting period	Disclosure period	Number of entities subject to the disclosure obligation	Disclosures of activities submitted on time	Late disclosures of activities	Recipients of the first reminder letter	Recipients of the second reminder letter
1.4.-30.6.2024	1.7.-31.8.2024	1 003	797 (79 %)	206 (21 %)	24	0
1.7.-31.12.2024	1.1.-28.2.2025	1 127	944 (84 %)	183 (16 %)	107	29

The oversight revealed that the high number of late disclosures of activities was mainly due to misunderstanding and carelessness. Many entities subject to the disclosure obligation were unaware that they were obliged to submit the disclosure even if they had engaged only in small-scale lobbying or if they had not carried out any lobbying.

Oversight of the content in the disclosures of activities

The Transparency Register experts carried out an enhanced review of the disclosures of activities submitted during the second disclosure period as part of the Register's data quality management and oversight. Special attention was given to the subjects reported in the disclosures and their quality.

As a result of the review, individual errors were detected in the information reported in the disclosures of activities, but non-compliance was not suspected in these cases. In these cases, the same subject of lobbying had been disclosed several times in the disclosure of activities, for example. The aim has been to address minor errors observed by providing guidance and advice.

In individual cases, the registrar assessed that the information in the disclosure of activities was so incomplete that it decided to investigate the oversight finding as a suspected case of non-compliance. At the time of writing the report, the oversight is still ongoing.

Reports on suspected non-compliance

In 2024, the National Audit Office received one report on suspected non-compliance related to a disclosures of activities. Based on the report on suspected non-compliance and the information presented in the media, the National Audit Office found that information on lobbying activities carried out could be missing from the disclosure of activities. The National Audit Office made an oversight finding decision on the matter²⁹ and started to investigate the case.

The National Audit Office sent a request for clarification³⁰ to the discloser and later a request for further clarification³¹, and the discloser submitted the requested information in due time. The discloser also supplemented the information in its disclosure on its own initiative. The oversight ended with a decision to discontinue the case.³²

Ex-post evaluation of the Finnish Transparency Register Act in 2026

As the authority overseeing the Finnish Transparency Register Act, the National Audit Office has identified provisions requiring clarification in the Act. Proposals to clarify these provisions will be put forward when the Ministry of Justice carries out an ex-post evaluation of the legislation on the Finnish Transparency Register during the current government term. Based on this evaluation, the possible extension of the scope of the Act to central government agencies as well as other development needs will be assessed. The Ministry of Justice will carry out the ex-post evaluation together with the National Audit Office, and a broad range of stakeholders will be consulted in the process.

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- 14 Section 6, subsection 5 of the Finnish Transparency Register Act (430/2023).
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- 17 Section 9 of the Finnish Transparency Register Act (430/2023).
- 18 Section 9, subsection 1 of the Finnish Transparency Register Act (430/2023).
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- 21 Request for clarification and request for opinion D/7/04.13.01.03/2024.
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- 31 Request for further clarification D/7/04.13.01.03/2025.
- 32 Decision to discontinue the case D/7/04.13.01.03/2025.



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