

Asia: VN/4118/2019

**Request for an opinion on the report of the Parliamentary Steering Group and the Expert Working Group, draft government proposal for a Transparency Register Act**

Statement by the opinion of the opinionor

**Are you in favour of setting up a transparency register in Finland?**

Yes

**Which of the three options for the scope of the transparency register should be chosen (i.e. which parties should be subject to the obligation to provide information)?**

Parliament and ministries

**General remarks**

Thank you for the opportunity to comment on the Transparency Register. We consider that application of the Transparency Register to the Parliament and Ministries would be a proportionate approach, appropriately focussed on political and legislative activity.

Regarding the bill itself, we would recommend further public consultation on the actual detail of the notification requirements, to ensure clarity and consistency of understanding in relation to the information to be submitted. Finally, we agree that an estimate only should be required in relation to financial resources linked to advocacy activity, as it is often difficult to calculate this - particularly for in-house advocacy teams covering many stakeholders and countries.