LOBBYING

Introduction

Lobbying is an essential part of a democracy. Interest groups need to be able to talk to their representatives and other officials about policies and programs of interest. The voting public needs to know who is informing and influencing decisions. Lack of transparency prevents understanding, identifying, and addressing unequal access to decision makers. This is undesirable not only because it limits access and insight into decision-making, but also due to the fact that it results in a narrower range of views and alternatives considered in policy design and can contribute to corruption and unethical behavior. In the absence of impartially administered lobbying rules that promote transparency, only those with personal connections or the money to get close to decision makers can initiate discussion.

Lobbying data should be comprehensive enough to give citizens an accurate picture of how decisions are being made and who is having an impact on legislation and policies. Lobbying should not be conducted such that it affects the rights of individual citizens, preventing them from gaining access to public decision makers. (See *Good to Know: Key Terms* used in this section.)

This analysis is part of the <u>Broken Links: Open Data to Advance Accountability and Combat Corruption</u> report, which offers an overview of data frameworks and data availability in OGP countries across eight policy topics using data from the Global Data Barometer.

	Key Takeaways
Availability	A quarter of OGP countries assessed in the Global Data Barometer (GDB) publish lobbying data. Four countries publish lobbying data despite an absence of legislation.
High-Value Information	Half of the available datasets include the topic of the lobbying interaction and the goal of the meeting. Fewer than a quarter include specific dates or how much money was spent on the interaction, limiting the ability to track influence.
Usability	All but one of the datasets are free to access. Half were updated recently, and less than a quarter were available for bulk download. This greatly limits the usefulness of data for tracing the influence and footprint of lobbyists and their clients, or ensuring compliance with codes of conduct.
	27%

of OGP countries have data available online Citizens protesting in Chile after officials approved HidroAysén, a controversial \$3.2 billion project to build five dams on two of Patagonia's wildest rivers. The project was backed by the Chilean companies Endesa and Colbun. A congressional report later revealed that there had been irregularities and flaws in the government's environmental approval process for the dams. This section discusses how creating a transparent lobbying register is one of the major measures to ensure that access to public officials is open, accessible, and ethical. Photo by Gricel Dayhanna Sepúlveda Rozas.



Many countries are working to include "lobby registers" in various parts and levels of government. These digital registers are used to centralize and publish information on lobbying for scrutiny by the public. Creating a transparent lobbying register is one of the major measures to ensure that access to public officials is open, accessible, and ethical. Lobbying data—especially when combined with legislative voting records, transparency in political finance, and strong ethics enforcement—can make the legislative process more accountable to the public interest.

Transparency is an essential part of improving the overall integrity of lobbying. Transparency by itself can support integrity but also must be supported by clear rules and guidance for officials and lobbyists, standards of conduct, and enforcement for violations of rules.

Policy Justification

- Lobbying is an important part of any democracy. But transparent lobbying is more democratic. Lobbying takes place in <u>all societies</u> (Eagan, n.d.). The difference is that in some places, it is secret and informal. In others, it is transparent and regulated. While personal connections still matter, even in a situation of full transparency, it will be harder for any one interest group to maintain a monopoly on communication with decision makers.
- Equality of access to decision makers is essential to fairness. Lobbying transparency makes decision-making more representative of diverse interests. A study of Chile's lobbying law commissioned by OGP showed that, when the country's lobbying transparency law was passed, the number of meetings between the public and government increased, as did the diversity of participants (OGP, 2016).

Transparency supports accountability for ethics.

When combined with political finance and other anti-corruption data, access to lobbying data allows governmental and nongovernmental watchdog organizations to flag conflicts of interest and corruption. (See Lobbying in the 21st Century for an explanation of how political finance data needs to be combined with lobbying data [OECD, 2021].) The two data systems work together to help voters understand how policy is made, who influences their elected representatives, and whether they should take actions to hold lobbying organizations to account.

- Transparency makes for better rules. At the administrative level, transparency of lobbying allows courts to review whether an administrative decision was arrived at through a legal and reasoned process. This is especially powerful when combined with regulatory transparency and judicial review of regulations (World Bank Group, 2016). The recent Organisation for Economic Co-operation and Development (OECD) report, Lobbying in the 21st Century: Transparency, Integrity, and Access, identifies two main risks of secretive lobbying: monopoly of influence (when groups that are financially and politically more powerful have more weight than other interests with fewer resources) and undue influence (when policies are influenced by providing covert, deceptive, or misleading evidence or data [OECD, 2021]).
- Transparency encourages wider participation. Decision makers, aware that the public is watching, have added incentive to: consult a broader range of parties, limit interactions (and finance) from corrupting actors, and take steps to ensure that decisions reflect the broader public interest. In addition, this data allows decision makers to proactively reach out to underrepresented interest groups who might otherwise have a strong interest in the issue.

Professional lobbyists prefer transparency. In

a survey of professional lobbyists and legislators conducted by the OECD, the overwhelming majority of respondents preferred greater transparency and professionalization. Lobbyists, in particular, felt that there was a stigma attached to their activities and that transparency might "alleviate actual or perceived problems of inappropriate influence peddling." (See Organisation for Economic Co-operation and Development (OECD) Lobbying Brochure, p. 2 [OECD, 2013].) Further, it allows citizens to evaluate the decision-making process more precisely and then consider this when voting in elections.

GOOD TO KNOW

Key Terms

- · Lobbying: Defined by Transparency International as "any activity carried out to influence a government or institution's policies and decisions in favor of a specific cause or outcome," lobbying is a legitimate activity and an important part of the democratic process. Public officials need to be available to the people who elected them as well as to citizens and interest groups. This is true of elected officials as well as administrative officials. Lobbying allows people interested in political and policy decisions to observe, inform, and shape government decision-making.
- · Lobbying register: This is a digital register to which all individuals and organizations that engage in lobbying must sign up to conduct their lobbying activities, and within which such activities are to be reported periodically along with any designated supplementary information. In many countries, officials will also record meetings. The lobbying register should include information on: lobbyist identity; the subject matter of lobbying activities and outcomes sought; the ultimate beneficiary of lobbying activities (where relevant); the targeted institution and/or the public official concerned; the type and frequency of This criteria was adapted from International Standards for Lobbying Transparency (n.d.).

 Transparency supports responsible corporate lobbying. Finally, it allows members of the public, as well as corporate shareholders, to investigate engagement and influence from interest groups. (See, for example, UNPRI's summary of *Responsible Climate Lobbying*, wherein shareholders are increasingly demanding disclosure of corporate political activity [PRI, 2018].)

lobbying activities; any supporting documentation shared with the public officials; lobbying expenditure; including in-kind (calculated to set criteria, in cost bands, if need be); sources of funding, per client and per dossier; any political contributions, including in-kind; any prior roles as public official held by the individual and/or family members; public funding received.

GOOD TO KNOW

What Does "Lobbying Data" Mean in this Report?

This module covers findings from the Global Data Barometer on the publication of lobbying data in OGP countries. It includes information on the availability of the following types of data related to lobbying:

- Unique identifiers for lobbyists and public officials
- · Clear identifying information for lobbying clients
- · Details on interactions between lobbyists and public officials
- Details on lobbyists' goals
- Dates and time details of interactions
- Topic of interactions
- Money spent on lobbyists' interactions

State of Progress Through OGP

Lobbying commitments have been relatively unpopular among OGP members. Despite being central to public participation, transparency, and anti-corruption, lobbying commitments remain surprisingly rare in OGP, with 16 members making 24 commitments over OGP's first ten years. This is a small number relative to both the importance of the policy and in comparison to other policy areas-for example, the closely related public participation in regulatory processes, where dozens of countries have undertaken commitments to create participatory structures to allow people to inform policy-making. There may be a number of reasons for this: the relative newness of the topic in some countries, the association of lobbying with the legislative branch (which is a small but growing part of OGP), or the reticence of politicians to undertake such commitments.

Most lobbying commitments have focused on legal reform. The majority of commitments concern passing legislation. This focus on legal reform is fairly unique among OGP policy areas. In other policy areas, the use of legislation to advance commitments is less common, as most reforms are primarily administrative. (Of course, some countries have unlegislated codes of conduct, such as Spain or Germany, which encourage publication but are more limited in scope.) Where specified, most commitments cover the legislature. Two (Italy and Madrid) specifically address lobbying and meeting records for administrative officers. A smaller number of commitments also cover transparency of lobbying in the executive branch, such as Chile.

Commitments to implementing existing laws have been less common. Only four members are committed to implementation (Chile, Italy, Madrid, and Noth Macedonia), showing that, among OGP members, this policy is still relatively nascent. And unlike most policy areas included in OGP action plans, lobbying commitments are not centered on digital approaches to government. Only North Macedonia explicitly commits to developing a digital platform for public participation in legislation.

Commitments in this area typically have stronger potential impact relative to commitments in other policy areas. Over half of lobbying commitments (13 of 24) were rated as having high potential impact by the Independent Reporting Mechanism. This is double the median (22 percent) for most topics in OGP, showing just how impactful this reform is to OGP members. Twelve of 24 have seen substantial completion, which is slightly lower than the typical OGP commitment area.

Key Findings from the Global Data Barometer

GOOD TO KNOW

About GDB Data

The Global Data Barometer (GDB) is a global expert survey drawing on primary and secondary data that assesses data availability, governance, capability, and use around the world to help shape data infrastructures that limit risks and harms. Together with regional hubs and thematic partners, GDB researchers collected data on 109 countries, including 67 of the 77 OGP participating countries. The GDB captures data developments between May 1, 2019, and May 1, 2021, and includes 39 primary questions and over 500 sub-questions.

Very few OGP countries publish lobbying data.

The GDB is the first global review of lobbying laws and actual implementation of lobbying registers in 67 OGP countries.¹ Eighteen of the 67 (26 percent) OGP

FIGURE 1. Few OGP countries publish lobbying data online

This figure shows the percentage of OGP countries that publish lobbying data online compared to the global average. The GDB assessed 109 countries, 67 of which are OGP members.



Note: This analysis only considers data that is available as a result of government action. See the About Broken Links section of the full report for more details.

The OECD's review of lobbying notably covers 41 countries, not all of which are OGP members. The findings reveal just how much work remains to be done if lobbying activities become transparent.

countries surveyed have some lobbying data online (see Figure 1). Nearly three-quarters (73 percent) have no lobbying data online.

Legal Frameworks for Lobbying Data

More than three-quarters of OGP countries assessed lack a lobbying law. Of those with such laws, most require disclosure of the lobbying data, although few explicitly require lobbying data to be published as open data (see Table 1). Of the 15 countries with lobbying laws, all but one publish their data.

FIGURE 2. Gaps in legal frameworks governing lobbying

This figure shows the percentage of OGP countries with collection and disclosure requirements for lobbying data. The sample includes all 67 OGP countries assessed by the GDB.



Note: This analysis only considers binding laws and policies that exist and are operational. See the About Broken Links section of full report for details.

While many countries do not have lobbying laws, a number do publish data on lobbying. This may be due to the existence of administrative requirements or voluntary standards. Four countries were found to publish lobbying data despite not having fully enacted legislation. All four were European: Germany, Italy, and Spain have draft laws or laws that were not yet implemented, and the Netherlands has data even though it has no lobbying disclosure law (see Table 1).

TABLE 1. Even without laws, some countries publish data

This figure shows the number of OGP countries with laws governing collection of lobbying data compared to the number of OGP countries with published data. The sample includes all 67 OGP countries assessed by the GDB.

	No Law	Law
No Data Published	48	1
Data Published	4	14

Note: This analysis only considers binding laws and policies that exist and are operational. Countries with "partial" disclosure are considered cases of "no" disclosure. See the About Broken Links ssection of full report for details.

The actual data disclosed is limited in the topics it

covers. Very few countries, even those with relatively strong laws, provided important data points (see Figure 3). The missing data on lobbying includes the following critical data points:

- Unique identifiers for lobbyists
- Meeting topics or purposes

FIGURE 3. Required collection and availability of high-value information is limited

This figure shows the percentage of OGP countries that require collection of key elements of lobbying data compared to those that publish the key elements online. The sample includes all 67 OGP countries assessed by the GDB.



Note: For this analysis, countries with "partial" disclosure are considered cases of "no" disclosure. See the About Broken Links section of full report for details.

- Duration of meetings
- Expenditures

This limits the ability of stakeholders in government, watchdog organizations, advocacy groups, or the private sector to track interactions.

Usability is heavily impaired. Only a tenth of OGP national members had freely available, bulk downloadable data, meaning that, even among those that made it available, the cost to analyze and use for accountability could be prohibitive

(see Figure 4). Of those that also had published data, fewer than a quarter offered that data as bulk downloads, adding considerably to the cost and intensity of gathering information.

FIGURE 4. Lobbying data lacks usability

This figure shows the percentage of OGP countries whose lobbying datasets meet open data criteria. The sample includes only the 18 OGP countries that publish lobbying data online.



Note: For this analysis, countries with "partial" disclosure are considered cases of "no" disclosure. See the About Broken Links section of the full report for details.

Maturity Model for Future Actions

Below is a set of steps—from foundational to advanced—that members across the spectrum of policy implementation can take to improve the collection and disclosure of high-quality lobbying data. Open data alone, however, is not enough (see the *Beyond Open Data* section for a discussion of other steps that must complement data collection and disclosure).

- Establish a modern lobbying law: Modern lobbying laws require disclosure and reporting through digital means. They take a broad, nondiscriminatory, nonpunitive approach to disclosure, which incentivizes transparency and participation of all interested parties. Particular industries or interests do not have special rules, and the law does not stigmatize lobbying.
- Extend coverage beyond the national legislature: Many older lobbying laws only cover the legislature. In modern countries, this is inadequate. Much of the law is created in ministries, departments, and agencies through the development of bylaws and regulations. Lobbying transparency, ideally, then, should cover both legislative and executive branches. In addition, especially in governments with unitary legal systems, such lobbying requirements can be extended to the local and provincial levels. In governments with more federal structures, such as Spain, regional governments have shared resources and learning in establishing lobby registers (Dickson, 2012). A growing number of countries, according to the OECD's Lobbying in the 21st Century Report, are also including judiciaries and tribunals in reporting requirements as they are frequently asked to determine public policy outcomes in policy areas with major social impacts, such as constitutional rights protections, trade and commerce, national security, labor, and environmental protection (OECD, 2021).

- Implement double-entry reporting: A growing number of lobbying laws require filing by both lobbyists and lobbied parties. This allows for verification of filings and an opportunity to identify omissions.
- Establish a unified lobby register: As this report shows, the majority of OGP countries do not yet have a unified lobby register. The intent is to establish and maintain a comprehensive and freely accessible unified website containing clear identifying information for all existing lobbyists, reasons for visits, lobbying targets, and other data regularly reported.
- Ensure timely public access, validation, and reuse: Advocates want to know who is influencing legislation; shareholders want to know what corporations (and governments) are doing; and lobbyists favor open registries. Beyond investors, the general public has been increasingly interested in the lobbying activities of companies, especially around issues such as climate change. In order for stakeholders to track the behavior of companies, they must have nearly-immediate filing of meetings and, where there are omissions or errors, the public should have the ability to flag those errors and request correction.
- Build for interoperability and reuse: Ensure that all data includes unique identifiers for the lobbyist, the represented interests, and the purpose of the meeting. This allows for better tracking and comparison with other records, such as government contracts (see Good to Know: Common Identifiers to Link Up Anti-Corruption Data).

GOOD TO KNOW

Common Identifiers to Link Up Anti-Corruption Data

Data is more likely to advance accountability when it can be combined with other data. In addition to the high-value elements of each dataset, certain elements should be shared across datasets through the employment of "common identifiers." These may be stored in a third dataset, reducing the need for data cleaning and validation.

Combining lobbying data with political finance, rulemaking, and procurement data is particularly important. When designing or improving a particular dataset, decision makers should ensure that datasets rely on common identifiers as much as possible and require validation of those common identifiers in the entry of information. The facts below show how many OGP countries have the most important common identifiers for lobbying data.

- **7%** of OGP countries publish unique identifiers for each lobbyist and public official in lobbying datasets. This allows interests to be tracked across lobbying registers and ensures cleaner data.
- 3% of OGP countries use common identifiers in lobbying data and political finance data for lobbyist clients and party and campaign donors. This limits the degree to which oversight bodies, auditors, and watchdog organizations can identify bad actors or potential kickbacks for political campaigns.
- **No** OGP countries use common identifiers for regulations in lobbying registers and public consultation data. This prevents users from tracing the influence of interest groups or organizations within certain rulemaking processes.

Beyond Open Data

Open data alone will not ensure that lobbying contributes to greater cleaner, fairer politics. Rather, a number of institutions, policies, and practices are necessary to help ensure that information is useful, usable, and used. Two functions, in particular, merit closer consideration: the role of monitoring and oversight and more structured means of encouraging public engagement. (In addition, ethics enforcement, beyond the scope of this report, is another necessary component.) Without these elements, it will be difficult for data on its own to have a major impact.

Monitoring and Oversight

Lobbying registers are not self-sustaining. They require institutions that will set the rules for data collection, monitoring compliance, publishing data, and supporting analysis or enforcement actions where required.

Notably, the mandate for maintaining lobbying registers is not uniform across countries. In Canada, there is a lobbying commission with an appointed commissioner responsible for carrying out the law. In Chile, the Transparency Council is responsible for overseeing lobbying disclosure (along with other issues closely related to fighting corruption). In the US, implementation of the Lobbying Disclosure Act is overseen by the House of Representatives and the Senate through the Clerk of the Congress, with the US District Attorney for the District of Columbia carrying out enforcement. While there may be room for debate about how and where the mandate is placed, a number of functions are necessary to ensure a lobbying register system operates properly. The following assessment and oversight functions are adapted from Lobbying Transparency (a consortium of organizations including Access Info, Sunlight Foundation, Transparency International, and Open Knowledge Foundation) (International Standards for Lobbying Regulation, n.d.).

- Management and investigation: An independent, mandated, and well-resourced oversight body or coordinated mechanism should be charged with:
- o Managing lobbying registration
- o Reviewing potential conflicts of interest
- Collating and disseminating the locations of proactively disclosed information
- Monitoring compliance (including proactive verification and spot audits of reports)
- o Following up on complaints
- o Investigating apparent breaches and anomalies
- o Consulting on and defining further regulatory provisions where there is a mandate
- Advice, analysis, and awareness raising: This body or mechanism should also: offer guidance and training to lobbyists and public officials on the application of relevant laws; analyze trends and report on their findings; raise awareness among the public and the profession on recent developments; and promote best practices of lobbying transparency.
- Complaint mechanism: There should be a well-publicized complaint mechanism that allows anyone to report violations either openly, confidentially, or anonymously and to be informed of outcomes of the complaint, subject to any privacy limitations.
- **Sanctions:** Lobbyists and public officials must be subject to effective, proportionate, and dissuasive sanctions for violating lobbying rules.

Public Participation

In addition, the public will need a clearly established law and processes by which it can participate in decisions. Transparency of lobbying alone will not be enough if all organizations and individuals do not have equal access to decisions.

Public Participation in Legislation and Rulemaking

- Right to participate: There should be a generally recognized right for all groups and the public at large to participate in public decision-making, extending in particular to legislative and policy matters within all levels of governance.
- Public consultation process: A legal framework should lay out in a law or a group of laws the varied means for public participation in the formulation, implementation, and evaluation of policies and laws, including time frames and specific mechanisms to disseminate public meeting information, attendance and participation rules, instruments and tools to submit comments and opinion on specific policies, as well as feedback on how inputs were taken into account. (See the *Rulemaking* module of this report for more on how some governments use open data to encourage greater engagement.)
- Safeguards for democratic freedoms: Any regulatory measures to secure lobbying transparency should be proportionate, fit for purpose, and not impede the individual rights of assembly, free speech, and petition of government.

Public Participation About Lobbying

- **Regulations and rulemaking:** Formation of new lobbying rules and regulations should be subject to similar oversight and consultation. The public should have access and opportunity to provide input related mechanisms ensuring compliance with lobbying laws, and have the ability to suggest amendments to existing rules.
- Reporting on equality and diversity of access: Legislatures and other rulemaking bodies should regularly report on who takes part in decision-making and what efforts have been made to reach out to a wider group of constituents and interested parties.



A panel at the OGP Global Summit in Mexico discusses international standards on regulation and transparency of lobbying. Photo by OGP.

Additional Transparency Measures

Beyond lobbying registers, additional mechanisms can strengthen the transparency of how laws and policy are made:

- Legislative and committee agendas: Publication of these important documents allows any interested party to assess the legislative process and determine the necessary oversight.
- Regulatory and legislative footprints: So-called "footprint" documents bring together information and data on corporation, lobbying, legislation or regulation, and political finance activity across jurisdictions and levels of government. These documents can assemble (through use of common identifiers) all of the activities of a particular lobbying organization, interest group, or other relevant stakeholders across different decisionmaking processes. See *Guidance and Standards* to learn about Transparency International's role in promoting and assembling legislative footprints.

Shareholder and stakeholder transparency:

Shareholders and stakeholders have become more interested in the lobbying activities and political positions of the companies in which they have a stake. Companies or industries may voluntarily disclose their activities according to common standards, such as in guarterly or annual financial filings. However, a growing number of governments and financial regulators are requiring such disclosures as part of regular corporate reporting requirements. Moreover, an increasing number of countries are also empowering shareholders to demand such disclosures. (See Guidance and Standards to learn about "The United Nations Principles for Responsible Investment Guidance" for more information on this growing set of disclosure requirements.)

GUIDANCE AND STANDARDS

Lobbyingtransparency.net is a major

collaboration between **Access Info, Sunlight Foundation, Transparency International**, and **Open Knowledge Foundation**, which promotes better lobbying rules through a three-pronged approach: transparency, equality of access, and ethics (International Standards for Lobbying Regulation, n.d.). It is a valuable resource for reformers, with definitions of key legal terms and recommended standards.

The Organisation for Economic Cooperation and Development (OECD)

Principles for Transparency and Integrity in.

Lobbying are part of a larger body of work on lobbying carried out by the OECD (n.d.). The majority of OECD countries lack lobbying laws. As a consequence, these ten principles remain relevant for most OECD members and beyond when designing or updating lobbying policies. In the absence of clear lobbying guidance, the OECD has also worked with members to establish <u>Codes of Conduct for Lobbyists</u>, which can help pave the way to more formal official systems (OECD, 2012). Codes of conduct can complement necessarily governmentadministered systems. Shareholders and investors (and stakeholders more broadly, such as consumers) are increasingly demanding that companies engage in ethical lobbying consistent with environmental, social, and governance goals. A number of corporate regulatory missteps have further intensified demand, including the 2015 Volkswagen pollution emissions scandal, as well as increasing global focus on combating climate change. The **United Nations Principles for Responsible Investment**, a UN-supported network of private sector actors, has developed <u>recommendations</u> to create a policy environment that supports responsible lobbying (PRI, 2018).

Transparency International has also made recommendations for expanding lobbying law coverage and disclosure to create a more comprehensive "legislative footprint" (Berg, 2015). Many of the recommendations deal with improving the coverage (who, what, and why) of lobbying activity and improving data standardization and interoperability to understand which decisions and institutions are being influenced and by whom across the European Union.



LESSONS FROM REFORMERS

Implementation of Lobbying Law in Chile

Before 2014, Chile had no formal legislation or regulation requiring lobbying disclosure. A string of scandals (Bonnefoy, 2016) in late 2014 regarding illegal campaign contributions, bribery, and corruption led to <u>record-low approval</u> ratings for elected officials (Thomson & Quiroga, 2016) and significantly affected public trust in the government. Further investigations found that corporate executives and public officials <u>held frequent</u>. <u>undisclosed meetings</u> (Valenzuela & Sahd, 2017), leading to private exchanges in resources and disproportionate opportunities for influence. Consequently, Chile enacted legislation in 2014 to modernize its system of lobbying. In its second OGP action plan, Chile (n.d.) <u>committed to implementing and monitoring</u> its newly passed lobbying legislation. The commitment included finalizing lobbying transparency rules with citizen consultation and training public officials responsible for implementation. A lobbying website was created, where citizens can find information on registered lobbyists, hearings records, travel-related records, and donor information published in open data format (Info Lobby, n.d.).





LESSONS FROM REFORMERS

Mandatory Lobbying Registry in Madrid, Spain

In 2015, the Madrid City Council experienced a change in party control for the first time in 25 years, <u>mainly due to a new anti-corruption movement</u>, questions surrounding public procurement processes, and reports of political corruption (BBC, 2015). In its first OGP action plan, Madrid responded to these perceived fears of corruption by committing to creating a mandatory lobby registry for the Madrid City Council to ensure traceability of public decisionmaking. Major milestones included creating a publicly available lobby registry, ensuring ease of use and accessibility for those required to register, and incentivizing registry via an alert system to inform those registered about decision-making processes or potential meetings with the city council. As of early 2021, over 500 lobbyists have <u>successfully registered</u> (Transparencia, n.d.). Following the success of this local commitment, Spain (n.d.) <u>committed</u>. <u>to</u> establishing a federal law regarding lobbying transparency in its 2020– 2024 action plan.

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Lobbying is part of the *Broken Links: Open Data to Advance Accountability and Combat Corruption* report that can be found here: <u>https://www.opengovpartnership.org/broken-links/</u>