

METHODOLOGY

MEP DECLARATIONS OF PRIVATE INTEREST ANALYSIS

Introduction

The European Parliament's [Code of Conduct for Members](#) regarding integrity and transparency makes it compulsory for MEPs to disclose their financial interests and outside activities at the beginning of their mandate (*art 4 of the Code*). The outside activities (Annex I) that must be reported are:

- Remunerated activities undertaken alongside a mandate, including self-employed activities, if the annual remuneration exceeds 5000 EUR gross per calendar year.
- Memberships of boards or committees of any entity, including companies and NGOs, including any type of remuneration, whether financial or in-kind
- Holdings in any company or partnerships with potential public policy implications or which give rise to significant influence in the entity concerned.

MEPs must also report any activity undertaken in the three years prior to their mandate. These have not been considered here. Our analysis is focused solely on current activities and income (corresponding to categories B, C & D of the declarations). The purpose of our analysis is to understand the performance of the system governing outside activities, following the introduction of new rules for private interests at the end of the last mandate.

Annual estimated income methodology

For income generating activities, MEP's can indicate a corresponding amount. This can be reported in a multitude of ways. To ensure comparability between MEPs, all incomes have been streamlined into estimated annual incomes. MEPs can report income in amounts that are either before or after tax. As it is not possible to know the applicable tax rates, nor do MEP's consistently indicate the nature of reported income, our calculations are reported as "estimated incomes".

70% of all income-generating activities are reported by MEPs either in a monthly or yearly format, with precise amounts provided. For monthly incomes, this amount was multiplied by 12 to reach the total estimated annual income.

The remaining 30% of paid activities are reported in free text instructions. For example, we found a declaration of a quarterly base income plus two monthly payments for board meetings attendances. We have transposed these instructions into a specific formula for each of these activities to reach the estimated annual income. However, in instances where the periodicity or frequency of an income is not provided (i.e.: 1000€ per board meeting with no further information) we applied the principle of at least one instance of the income per calendar year. The actual amount could be much higher, but due to lack of clarity, we opted for at least one amount.

Summary table:

Periodicity of income	Streamlining applied
Monthly	Exact amount provided multiplied by 12
Yearly	Exact amount provided
Other	<ul style="list-style-type: none"> • If frequency provided: formula applied. • If frequency not provided: one instance per calendar year.

Incomes reported with free text instructions have been streamlined to the best of our knowledge based on the instructions provided by the MEPs. The applied calculations are indicated in the dataset. We have also removed any duplicate income where this is manifestly evident. However, MEPs bear the sole responsibility for the veracity and amounts provided in their declarations of private interests. Incomes provided in national currencies have been converted to euros using the exchange rate applicable on the day of the last update.

Entities registered on the EU Transparency Register methodology

MEPs have a general obligation not to engage in paid lobbying activities during their mandate if the activity is directly linked to the Union decision-making process (*Art2, paragraph C of the Code*). To ensure enforcement of this rule, TI EU calls for an explicit ban on any side activities that might have EU policy implications, including those that are on the EU Transparency Register. To understand the scale of the issue, we cross-referenced the names of all entities found in the declarations of private interests with the transparency register. Any match is flagged as such in the dataset with the corresponding Transparency Register link provided.

This covers instances where the reported entity is directly registered or if the registration is an umbrella organisation that acts on behalf of subsidiaries. In the latter case, registrations were only taken into account if the subsidiaries are directly named on the transparency register entry or a link is explicitly provided to a website containing the list of subsidiaries.

A flag does not constitute an indication of a possible breach to the Code. It is important to cross-check the exact nature of the role, the type of registered organisation, and the legislative work carried out by MEPs.

Imprecise declarations

The purpose of the declarations is to allow wider scrutiny of MEP side activities, with key information provided to manage and prevent conflicts of interest. As no pro-active verification is performed prior to their publication, some declarations do not contain sufficient information to understand the exact nature of the side activity. TI EU flagged these activities as imprecise in the following instances:

- Role or name of entity not provided
- Impossible to locate entity online
- Generic activity descriptions with no further information (i.e.: “consultant”, “lawyer”)
- Ownership structure not provided, either in number of shares or minimum description of ownership (for category D activities only)

An imprecise flag does not constitute a breach to the Code. It indicates that the activity description does not contain enough information to manage and prevent a conflict of interest.

Scope of analysis

TI EU has collected the most recent declarations published on MEPs’ personal pages on the European Parliament website as of 2 December 2024. Please note that MEPs bear the sole responsibility for the contents of their declarations and must update their declarations by the end of the month during which any changes occur.

Updated declarations published after 2 December 2024 are not taken into consideration for this analysis. Please consult the MEP individual pages of the [EP website](#) for the most up to date list of declarations. These are uploaded to our online platform [EU Integrity Watch](#) once per month.

For questions related to methodology and access to the dataset of collected side activities, as well as general press enquiries, please contact: eupress@transparency.org.