

France Institutes Mandatory Lobbyist Registration

July 2017

As of July 1, 2017, France has instituted mandatory lobbyist registration for qualifying individuals, companies, and other organizations who communicate with government officials to influence public decision-making. France adopted the new lobbying law as part of an anti-corruption reform package in late 2016, and registration is now available through the High Authority for the Transparency of Public Life (HATVP).

Under the new law, a person must register as an “interest representative” (i.e., lobbyist) if the person’s main or regular duties include communicating with one or more designated public officials for the purpose of influencing public decisions – including qualifying public contracts. A person “mainly” conducts lobbying activities if the activity constitutes more than half of that person’s time during the last six months; a person “regularly” engages in lobbying communications if he or she conducted such activities at least ten times in the last 12 months. A company or organization is required to register if one of its officers, employees, or members either mainly or regularly acts as an interest representative.

Once registered, lobbyists will be required to file annual activity reports disclosing their expenditures, the categories of public officials contacted, and the matters on which they lobbied. Additional guidelines will be released this fall, specifying the content to be included in the annual reports.

Although the law provides criminal penalties for persons who fail to comply with their obligations, HATVP has designated the rest of calendar year 2017 as a ramp-up period for the new law. Interest representatives may register until December 31, 2017, and the first

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activity reports to be made public in April 2018 will not be subject to any penalties for non-compliance.

We are monitoring the rollout of this new lobbying regime and are available to answer any questions about how the lobbying law may affect your organization.