

Civil Society Europe analysis of the transparency of the Member States Permanent Representations to the EU

2024-2025 update

The detailed data for each Permanent Representation can be found at [this link](#)

The Permanent Representations of Member States to the European Union serve as the official link between the national governments and EU institutions. In particular, the Permanent Representatives participate in meetings of the Council of the EU and its preparatory bodies (Committees and Working Groups), notably the COREPER (Committee of Permanent Representatives), which prepares decisions for the Council of the EU, one of the co-legislators together with the European Parliament.

The Permanent Representations have therefore a paramount role in shaping EU policies. As such, a high degree of transparency should be expected, the disclosure of information relevant to the public being a key element of institutional accountability. This includes giving Civil Society Organisations the opportunity to engage in fruitful discussions with Ambassadors and civil servants as part of the Treaties requirement to “maintain an open, structured and regular dialogue with civil society and representative associations (of citizens)” (art. 11 TFEU).

In addition, Permanent Representations should keep a public record of high-level exchange of views to allow public scrutiny of the different actors aiming to influence the policy making process, with the aim of also ensuring a balance between the different interests and that the concerns of citizens are adequately heard.

While the Permanent Representations to the European Union do not have specific disclosure obligations, transparency of the institutions is mandated by the Treaties of the EU (art. 15 TFEU), while the right of access to documents from the institutions is enshrined in the EU Charter of Fundamental Rights (art. 42).

The European Ombudsman also noted in its [2018 strategic enquiry](#) that in order for European citizens to properly exercise their democratic right to participate in the EU’s decision-making process, and hold those involved to account, legislative deliberations must be sufficiently transparent. While this report does not cover directly the transparency of the positions of Member States in the preparatory legislative work of the Council and the lack of follow up to these recommendations, it is clear that access to information on who is involved in EU decisions is a first step.

In 2023, Civil Society Europe for the first time carried out a [comprehensive assessment](#) of the level of transparency of all Permanent Representations to the European Union, on the basis of information publicly available on the Permanent Representation websites. The present analysis (available [here](#)) represents a follow up and updating of that first assessment. The elements that were looked at are:

- 1) The disclosure of the Permanent Representation internal structure: organigramme, staff names and portfolios.
- 2) The disclosure of the contact details (emails and phone numbers) of the civil servants.
- 3) The publication of the list of meetings held between the Ambassadors and interest representatives (transparency register).

The analysis does not consider elements such as reactivity in responding to inquiries, availability to accept meetings with stakeholders, and the general approach towards engaging with interest representatives overall. While these elements are of crucial importance, they are also much difficult to assess objectively and compare, and capacity constraints did not allow to incorporate them into the present analysis.

The preliminary outcome of this analysis was shared with all the Permanent Representations of Member States to the EU (see list at the end of the document) in October 2024 to allow for feedback and exchange. The analysis was subsequently updated and the info reported was last checked on 11 April 2025.

Overview

The outcomes show significant differences in the level of transparency of the Permanent Representations of Member States to the EU. While a few of them make all the relevant information publicly available, others barely disclose their internal structure and do not reveal which interest representatives the Ambassadors are meeting.

Overall, only 6 Permanent Representations (Croatia, Finland, Italy, Portugal, Romania and Sweden) have all information available and regularly updated on their websites. 8 (Czech Republic, France, Hungary, Malta, Poland, Slovakia, Slovenia, Spain) make most of the information available, while 5 of them (Cyprus, Estonia, Latvia, Lithuania, Luxembourg) publish only some contact details of their staff, but not the transparency register. Going down the list, we found out that 6 Permanent Representations (Austria, Belgium, Denmark, Germany, Greece and The Netherlands) disclose only a few names and contact details of their staff, although some of them have an updated transparency register. Lastly, the Permanent Representations of Bulgaria and Ireland do not make public the list of meetings with interested representatives, nor any contact details of civil servants.

When [comparing the results](#) with the [first analysis](#) carried out in 2023, it can be noticed that 3 Permanent Representations (Czech Republic, Denmark and Spain) have been downgraded because of their transparency register being not up-to-date or of the removal of information previously available on their websites. On the other hand, Finland, Poland and Romania have improved their transparency by disclosing internal structure and contact details to a greater extent, publishing or updating their transparency registers, or because of a reassessment of the information available.

Disclosure of the internal structure

Disclosing the internal staff structure is the first step to allow stakeholders and the general public to have a clear overview of the different units within each Permanent Representation, as well as to identify which civil servants are responsible for specific policy areas.

Overall, the majority of the Permanent Representations make this information publicly available, with 22 out of 27 publishing a clear organigramme or list with staff names and responsibilities. However, 5 Permanent Representations only disclose limited information about their internal structure or the names of their civil servants, mostly only at the Heads of Unit level.

Disclosure of contact details (emails, phone numbers)

The analysis shows a variety of different practices when it comes to publishing the contact details of the Permanent Representation civil servants, an essential element for allowing meaningful stakeholder engagement around specific legislative developments.

12 Permanent Representations make both the email addresses and the phone numbers of all or most of their staff publicly available. 7 of them choose to publish either the email addresses – sometimes by disclosing a general email format – or the phone numbers of the different civil servants. 5 Permanent Representations only disclose the contact details of a limited number of staff, while 3 do not publish any contact details.

Transparency register

Over half of the Permanent Representations publish a list of the meetings held between the Ambassador Permanent Representative and/or the Ambassador Deputy Permanent Representative and stakeholders of different kinds (business, trade unions, civil society organisations etc...). However, in several cases this list has not been updated for months or even years. The timely updating of the transparency register is of vital importance for making this tool really useful, allowing all interest representatives and the general public to monitor the recent exchanges that occurred around specific policy developments.

For the purpose of this analysis, the transparency registers have been considered up to date if they included meetings that took place in the last 6 months. This is a stricter criterion than the one previously used in the 2023 analysis, where a timeframe of 1 year had been used as a benchmark. It can be noticed that only 10 Permanent Representations out of 27 have a transparency register that has been updated at least once in the last 6 months.

Conclusion

The 2024-2025 update of CSE's analysis shows that the transparency of the different Permanent Representations is considerably uneven, with practices ranging from full disclosure to no information at all made publicly available. Some of the replies received from the Permanent Representations when sharing the preliminary analysis outcome with them pointed out the need of safeguarding staff privacy as a reason not to disclose information such as names, areas of responsibility, or contact details. While understanding concerns about security, Civil Society Europe believes that it is possible to strike a different kind of balance between the duty of protection towards staff and the commitment to high standards of institutional accountability, as shown by those Permanent Representations who opted for a high level of disclosure of the information covered in this analysis.

Civil Society Europe proposes the following recommendations to improve the transparency of the Member States Permanent Representations:

- 1) To fully disclose the names and contact details of all civil servants, providing clear indications about their roles and policy areas of responsibility.
- 2) To make visible the direct email addresses for each civil servant rather than generic email formats or contact forms.
- 3) To publish the list of meetings between the Ambassadors and interest representatives and update it at most every 2 months.
- 4) To increase the visibility and accessibility of such a list by making it available through a direct link in the homepage or main menu of the Permanent Representations websites.

List of the analysed Permanent Representations of Member States to the EU

[Permanent Representation of Austria to the EU](#)

[Permanent Representation of Belgium to the EU](#)

[Permanent Representation of Bulgaria to the EU](#)

[Permanent Representation of Croatia to the EU](#)

[Permanent Representation of Cyprus to the EU](#)

[Permanent Representation of the Czech Republic to the EU](#)

[Permanent Representation of Denmark to the EU](#)

[Permanent Representation of Estonia to the EU](#)

[Permanent Representation of Finland to the EU](#)

[Permanent Representation of France to the EU](#)

[Permanent Representation of Germany to the EU](#)

[Permanent Representation of Greece to the EU](#)

[Permanent Representation of Hungary to the EU](#)

[Permanent Representation of Italy to the EU](#)

[Permanent Representation of Ireland to the EU](#)

[Permanent Representation of Latvia to the EU](#)

[Permanent Representation of Lithuania to the EU](#)

[Permanent Representation of Luxembourg to the EU](#)

[Permanent Representation of Malta to the EU](#)

[Permanent Representation of the Netherlands to the EU](#)

[Permanent Representation of Poland to the EU](#)

[Permanent Representation of Portugal to the EU](#)

[Permanent Representation of Romania to the EU](#)

[Permanent Representation of Slovakia to the EU](#)

[Permanent Representation of Slovenia to the EU](#)

[Permanent Representation of Spain to the EU](#)

[Permanent Representation of Sweden to the EU](#)