



Position of Lobbyists and Public Affairs Professionals (LPAP) on the Application of the Law Regulating Lobbying in Cyprus

Contribution to the Rule of Law Report 2026

1. Introduction

Lobbyists and Public Affairs Professionals (LPAP) in Cyprus welcomed the adoption of the Law Regulating Lobbying and the establishment of the relevant Register under the supervision of the Independent Authority Against Corruption (IAAC). The enactment of the law marked a significant step towards strengthening transparency, accountability, and integrity in public decision-making, aligning Cyprus with European and international good practices on regulated interest representation. LPAP played a key role in both the discussions which led to the law as well as in educating lobbyists regarding its provisions.

As professionals who operate within the framework of democratic institutions and engage with public authorities on a daily basis, LPAP strongly support the principle that lobbying, when transparent and regulated, enhances the quality of policymaking by ensuring that decision-makers have access to structured information, expertise, and stakeholder perspectives. Regulation is therefore not a constraint on democratic participation but a safeguard for its legitimacy.

This position paper assesses the implementation of the lobbying law to date, highlights progress achieved, identifies persistent challenges—particularly in enforcement—and offers recommendations aimed at strengthening compliance and fostering a genuine cultural shift.

2. State of Implementation: Progress and Positive Developments

Since the entry into force of the lobbying law, approximately **260 individuals and entities have registered** in the official lobbying register. This number demonstrates a meaningful level of engagement by professionals who recognise the importance of operating transparently and in accordance with the law.

The IAAC has also undertaken **notable efforts in awareness-raising and education**, including guidance to lobbyists and public officials on their obligations, the scope of the law, and the procedures for registration and disclosure. These initiatives have been essential, particularly given that lobbying regulation represents a relatively new concept within the Cypriot administrative and political culture.

LPAP acknowledge that, at this early stage, the emphasis on education rather than sanctioning has helped build initial trust and understanding, encouraging voluntary compliance and reducing resistance to the new framework.

3. Persistent Challenges: Enforcement and Uneven Compliance

Despite these positive developments, **the application of the law remains uneven**, and its transformative potential has not yet been fully realised.

A central concern shared by LPAP is that **enforcement has so far been insufficiently robust**. While registered lobbyists generally comply with the law's provisions, there is a widespread perception—supported by practical

experience—that **certain individuals continue to meet public officials without registration or disclosure**, effectively operating outside the legal framework.

This situation creates several systemic risks:

- **Unequal conditions** between compliant professionals and those who bypass the law;
- **Erosion of trust** in the lobbying register as a meaningful transparency tool;
- **Limited cultural change**, as informal and opaque practices persist alongside formal regulation.

The absence of visible enforcement actions or consequences for non-compliance risks sending the implicit message that adherence to the law is optional rather than mandatory. Over time, this may discourage compliance and undermine the credibility of both the law and the supervising authority.

4. The Role of the IAAC: From Awareness to Active Policing

LPAP consider that the IAAC has played a constructive and necessary role in the initial phase of implementation. However, **the current stage of maturity of the framework requires a shift from education-centric implementation to active and systematic enforcement**.

Good practices from other European jurisdictions demonstrate that effective lobbying regulation relies on a balanced model combining:

- Clear guidance and support;
- Regular monitoring and verification;
- Proportionate but visible sanctions for breaches.

In many EU Member States, supervisory authorities proactively cross-check meetings, agendas, public consultations, and declarations of interest to identify undeclared lobbying activities. Enforcement does not rely solely on complaints but includes **ex officio investigations and risk-based audits**.

By contrast, the current Cypriot model appears overly reactive, limiting its deterrent effect and allowing informal practices to continue largely unchallenged.

5. Impact on Rule of Law and Democratic Governance

Effective regulation of lobbying is directly linked to the **rule of law**, as it ensures that public power is exercised transparently, predictably, and under equal conditions. Weak enforcement undermines these principles and perpetuates perceptions of privileged access, even where no illegality is proven.

From the perspective of LPAP, strengthening enforcement is not about criminalising lobbying or creating a hostile environment for engagement. Rather, it is about **normalising compliance**, protecting ethical professionals, and reinforcing public confidence in institutions.

A regulated, transparent lobbying ecosystem contributes to:

- Better-informed policy decisions;
- Reduced corruption risks;
- Greater accountability of public officials;

- Enhanced legitimacy of democratic processes.

6. Recommendations

LPAP respectfully submit the following recommendations for consideration:

1. Strengthen Enforcement Mechanisms

The IAAC should systematically monitor compliance, including proactive checks on meetings between public officials and third parties.

2. Adopt Good Practices from Other Jurisdictions

3. Cyprus should draw on EU models where lobbying oversight authorities combine guidance with audits, random checks, and proportionate sanctions.

4. Ensure Equal Application of the Law

Enforcement should target both registered and unregistered actors, ensuring that non-compliance does not confer an advantage.

5. Enhance Cooperation with Public Authorities

Public officials should be required and supported to verify registration status before engaging in lobbying activities.

6. Publish Aggregated Compliance Data

Periodic public reporting on compliance trends, investigations, and enforcement actions would enhance transparency and deterrence.

7. Conclusion

The law regulating lobbying in Cyprus represents a significant institutional reform and a genuine opportunity to strengthen the rule of law. While initial implementation has laid important foundations, **the absence of consistent enforcement risks entrenching old practices rather than transforming them.**

LPAP remain committed to transparent, ethical, and lawful engagement with public authorities. We call on the IAAC and relevant institutions to move decisively towards a more assertive enforcement model, drawing on international good practices, in order to ensure that the law delivers its intended cultural and institutional change.

Only through consistent application and credible enforcement can lobbying regulation fulfil its role as a pillar of transparency and democratic governance in Cyprus.