



High Authority
for transparency
in public life

2024

ACTIVITY REPORT
Summary

Role and missions of the High Authority

The High Authority for Transparency in Public Life is an independent administrative authority, which role is **to guarantee public integrity**.

The institution **supports and controls public officials and lobbyists daily**, in order to provide citizens with the assurance that public decisions are made in the general interest.

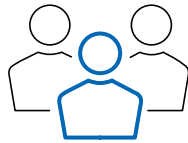
The missions of the High Authority are structured around four main areas:

- The control of **declarations** of assets and interests
- The prevention of **conflicts of interest**
- The control of **revolving-door movements** between the public and private sectors
- The regulation of **lobbying**

Key figures for 2024

COLLEGE

13 members



ADMINISTRATIVE AND FINANCIAL MANAGEMENT

9.8M€
Budget

TRANSPARENCY

4.3
million
of pages viewed
on hatvp.fr



75
permanent
staff
(as of 31/12/2024)



ADVICE AND GUIDANCE

More than

8000

calls and e-mails
handled in support of public
officials and lobbyists



57
external
presentations

Interview of Jean Maïa

President
of the High Authority
for Transparency
in Public Life



The year 2024 was marked by an unprecedented political context with European elections, early parliamentary elections, and the succession of four governments. How did the High Authority manage to meet these various deadlines?

Jean Maïa : The appointment of a new government at the beginning of the year, the election of French members of the European Parliament in June, immediately followed by the dissolution of the National Assembly and early parliamentary elections, and finally, the resignation and formation of two successive governments in September and December, had a very significant impact on the High Authority's activities. More than 13,000 declarations of assets and interests were filed by newly elected or appointed public officials, or those whose term of office or functions had ended, making 2024 one of the most intensive declaration exercises since the institution's creation. Changes within governments and ministerial cabinets have given rise to an unprecedented number of opinions on proposed appointments to public positions and revolving-door movements to the private sector. The High Authority's register of lobbyists has continued to see a rise in the registrations and declarations of activities and resources. The High Authority is actively working to ensure that the controls it is responsible for are in strict compliance with legal deadlines in this exceptional context. It has also implemented enhanced support for public officials and lobbyists subject to reporting

or ethical obligations, so that they have the best possible knowledge and understanding of these obligations and can fulfil them under the conditions required of them.

On 28 July 2024, the legislator entrusted the High Authority with a new mission aimed at preventing foreign interference in France. Did the High Authority call for this new responsibility? How is the institution anticipating the upcoming entry into force of the new register?

J. M. : Strengthening the transparency of influence activities carried out on behalf of a foreign principal in France and preventing the risks they can pose to our institutions is now a necessity. The High Authority has been addressing this issue since 2023 and has worked with the Organisation for Economic Co-operation and Development (OECD) to identify changes to the French system for preventing these risks. It has the expertise and tools to access structured information on this matter, which justified the legislator entrusting it with this new responsibility. Since the adoption of the law, the High Authority has been evaluating the risk of foreign influence posed by revolving-door movements of public officials to the private sector. It is also tasked with managing, starting 1 July 2025, a new register designed to ensure the transparency of influence activities when they are carried

out on behalf of a foreign principal. The implementation procedures for this register must be specified by decree. This new responsibility requires the High Authority to adapt its organisation and operations accordingly, including the size of its information system and staff. Therefore, it is necessary for the High Authority to be provided with additional resources at its disposal, otherwise it risks compromising its ability to effectively carry out this new mission.

You have just been appointed President of the High Authority, becoming its third President, succeeding Jean-Louis Nadal and Didier Migaud. What part of this legacy do you specifically wish to uphold ?

J. M. : The remarkable action of President Jean-Louis Nadal and President Didier Migaud, along with President Patrick Matet, who has served as interim President in recent months in an unprecedented institutional context, have enabled the High Authority to become the reference institution for transparency in public life and the key partner of public officials, elected officials, and administrations on ethical issues. The law of 25 July 2024, which I just mentioned, shows that the legislator regularly expands its missions, which demonstrates its anchoring in the French institutional landscape. Indeed, the High Authority has demonstrated its ability to address significant internal transformation challenges since its creation in 2013. The High Authority is already well-known even beyond our borders and regularly participates in European discussions on transparency and public integrity. Its involvement in the creation of the European Network for Public Ethics in 2022, which it chaired until the end of 2024, is one aspect of its influence.

Numerous developments in probity and integrity in public life have taken place since the High Authority's creation. How do you view the institution's prospects in this context? What areas of improvement do you identify?

J. M. : In a context where our fellow citizens doubt the probity of public officials, it is crucial that the High Authority maintains its role as a "trusted third party" between them and public officials. Our first line of work is to consolidate its ability to carry out its historical missions of controlling declarations, revolving-door movements' projects between the public and private sectors, and lobbying activities, and the new ones relating to the transparency of foreign influence activities. This objective goes hand in hand with continuing efforts to support public officials and streamline its procedures. The second line of work is an effort to better disseminate the doctrine of the High Authority, which regularly finds itself in a position to assess the existence of a criminal, ethical, and reputational risk in a wide variety of situations. In doing so, it is forging, under the supervision of the judge, a body of doctrine that it aims to make as accessible and readable as possible so that all those concerned – and there are many – can consult it easily. Finally, it is crucial for the High Authority to establish itself even more firmly in its local, national, and international settings. Dialogue with elected officials, courts and administrations, as well as with parliamentary ethics bodies, elected officials' associations and ethics networks, is fundamental to improving its work. The High Authority also aims to continue to promote the French model for preventing breaches of integrity beyond our borders and to contribute to progress, particularly at the European level, in spreading a culture of integrity.

Key events of 2024

11 January



Formation of Gabriel Attal's government

27 February



Speech by Didier Migaud, President of the High Authority, before the European Ministers responsible for public administration, public transformation and the civil service at the ministerial meeting of the European Network for Public Administration (EUPAN) in Ghent

22 April



Publication of the OECD report, «Strengthening the Transparency and Integrity of Foreign Influence Activities in France»

16 May



Publication and review of the declarations of the first-round senators elected in 2024

23 May



Hearing of Didier Migaud before the Senate Commission of Inquiry on Public Policies in the Face of Foreign Influence Operations

6–9 June



Elections of French Members of the European Parliament

25 July



Enactment of the law aimed at preventing foreign interference in France

21 September



Formation of Michel Barnier's government and resignation of Didier Migaud as President of the High Authority, appointed Minister of Justice

24 September



Haute Autorité pour la transparence de la vie publique

Appointment of Patrick Matet, member of the High Authority's College, as interim President

25 April



Annual meeting of the European Lobbying Registrars' Network

7 May



Hearing of Didier Migaud before the National Assembly's Law Committee on the proposed law to prevent foreign interference in France

15 May



Hearing of Didier Migaud before the Senate's Law Committee on the proposed law regulating the involvement of private consulting firms in public policy

28 June



5th Annual Meeting of Ethics Officers

30 June – 7 July



Legislative elections following the dissolution of the National Assembly announced on 9 June 2024 by the President of the Republic

1 July



Publication of the 2023 review of the declarations of activities of lobbyists

3 October



General Assembly of the EU Network Against Corruption (EACN)

10–11 October



General Assembly of the European Network for Public Ethics (ENPE)

14 October



Decision of the Council of State No.472123, *Institut Montaigne*

23 December



Formation of François Bayrou's government

Ethical advice and support

More than

8,000



calls and emails handled in support of public officials
and lobbyists



57 external interventions
in 2024
including 20 interventions
by the president

13



visits from foreign
delegations

8



missions
abroad

Sustained support for declarants in an unprecedented context

The High Authority provides daily assistance to public officials and lobbyists in fulfilling their obligations. The political and electoral events of 2024 required, particularly sustained support due to the significant turnover of public officials subject to obligations of the High Authority, which resulted in several waves of declarations from newly elected, appointed, and outgoing public officials, as well as numerous changes within ministerial offices.

The High Authority adapted to this unprecedented situation by conducting numerous targeted communication efforts with the relevant departments and by strengthening personalized support for public officials via telephone and email.

In parallel with these challenges, the High Authority implemented specific support for elected officials of public inter-municipal cooperation establishments (EPCI).

The High Authority also continued and strengthened its support efforts for lobbyists, particularly through specific awareness-raising activities at the local level, as 2024 was the first full year of implementation of the new guidelines, which came into effect on 1 October 2023.

A changing ethical advising activity

The High Authority issued 12 ethics opinions in 2024, due to the gradual implementation of Ethics officers for local elected officials since June 2023 and the numerous daily exchanges between the High Authority, these officials, and the administrations. It was also referred to the High Authority for the first time, on the basis of Article L. 131-15-1 of the French Sports Code, by an ethics committee created by a sports federation with the authority to collect declarations of interests from certain national and regional leaders.

Strengthening awareness-raising and training activities

In 2024, the High Authority carried out 57 external interventions, compared to 35 in 2023. These interventions were made to various audiences, at the request of government departments and local authorities, as well as higher education and educational institutions.

Promoting the French public integrity model

The High Authority continued its work within European bodies and networks to promote the development of more effective integrity and corruption prevention mechanisms in a context of particularly rich European events in this area, notably with the establishment, on 15 May of an inter-institutional Ethics Body of the European Union.

In 2024, the High Authority received 13 foreign delegations and carried out eight missions abroad, in response to requests for technical expertise from partner countries. It also continued its support of candidate countries for accession to the European Union in the area of preventing and combating corruption.

Monitoring the situation of public officials



13,103

declarations of assets and interests received

5,122

declarations of assets and interests controlled

27



cases referred to the courts for non-compliance with reporting obligations

99

injunctions to file a declaration

1,006

reminders



52.8%

of controlled declarations were deemed to comply with the requirements of completeness, accuracy and sincerity

47.2%

of controlled declarations required submitting an amended declaration

4.1%

of controlled public officials and agents were reminded of their reporting obligations

More than

4

out of 10 public officials whose declarations of interests were controlled presented a risk of a conflict of interests, leading the High Authority to request that they implement preventive measures

An increased number of declarations received in an unprecedented political context

In 2024, one of the most intensive declaration exercises since the creation of the High Authority took place. While the election of MEPs was anticipated, the holding of early legislative elections caused an unexpected surge in activity. Thus, the end of the MPs' mandate following the dissolution of the National Assembly and the legislative elections led on their own to the submission of nearly 1,300 declarations. The formation of three governments and the constitution of ministerial cabinets also triggered a large volume of declarations.

Despite this situation, an increasing submitting rate within the legal deadline

For all declarants, the average submitting rate within the legal deadline was significantly higher than in the previous two years: 72%¹ for declarations of assets and 70%² for declarations of interests, demonstrating greater awareness among public officials of their reporting obligations. However, delays remain persistent and continue to affect senior positions; in this regard, and for the first time, nine members of the Government, including members of Gabriel Attal government, submitted their declarations after the legal deadline.

Regarding the failure to submit declarations, in 2024, the High Authority referred 27 cases to the courts for this reason. Among these cases were, for the first time, those of three Members of Parliament.

An adapted monitoring plan

For the 2023-2024 period, several political and electoral events (European Parliament elections, renewal of senators in serie 1) as well as sporting events (Rugby World Cup in 2023, Olympic and Paralympic Games in 2024) were considered when defining the priorities of the monitoring plan.

In addition to these priorities, new priorities emerged during 2024, resulting from the legislative elections and the formation of three governments. The High Authority adapted to these circumstances by heavily mobilizing its services and consolidating its monitoring methods.

The High Authority thus relied on all the sources of information at its disposal and extensively solicited input from public officials themselves. In 2024, the High Authority exchanged with 73% of the individuals subject to its monitoring. For certain categories of public officials, these exchanges are almost systematic: this applies to members of the Government or regional elected officials, with whom exchanges occurred in 95% of cases.

An unprecedented volume of controls

The High Authority controlled 5,122 declarations of interests and assets in 2024 (2,816 declarations of interests and 2,306 declarations of assets), an unprecedented volume since its creation, a large proportion of which (2,171) concerned declarations by senators and deputies.

At the same time, the High Authority controlled nearly 1,000 declarations submitted by members of the Government or members of their cabinets.

The quality of the declarations controlled in 2024 was satisfactory and generally consistent with that of 2023. Across all public officials and civil servants, 52.8% of the controlled declarations fully complied with the requirements of completeness, accuracy, and sincerity imposed by law. The remainder mainly consisted of breaches that were of no significant consequence.

Although, following the control, 4.1% of public officials were reminded of their obligations, only 0.4% of them committed breaches likely to constitute a criminal offence which led to the High Authority to notify the public prosecutor.

Making data available to citizens

In 2024, the High Authority made 2,410 declarations public, including 1,817 on its website. As of 31 December 2024, 10,999 declarations were available for consultation, including 10,356 on the High Authority's website. The remaining declarations made public were made available to citizens at the prefecture.

Ethical oversight of public officials and officials



639

opinions issued on revolving-door movements' projects between the public and private sectors

Type of opinions (all types of revolving-door movements combined):

21.3%

compatibility opinions

74.3%

compatibility opinions with reservations

4.5%

incompatibility opinions

Including recruitment of officials who have recently worked in the private sector

293 opinions issued average processing time **8 days**

30 opinions issued on revolving-door movements' projects for former members of the Government

INCLUDING REVOLVING-DOOR MOVEMENTS TO THE PRIVATE SECTOR:



More than

75%

compatibility opinions with reservations



8.5%

incompatibility opinions

Increased monitoring activity due to the rise in revolving-door movements driven by current political events

The year 2024 saw an unprecedented number of referrals regarding revolving-door movements and pre-appointments. Thus, the High Authority received 751³ referrals regarding revolving-door movements' projects between the public and private sectors and issued 639 opinions on this matter. The end of the terms of office of members of the cabinet of Mr. Gabriel Attal and the formation of Mr. Michel Barnier's government led to an influx of referrals in September (90 referrals) and October (146 referrals).

Better understanding of the system by the administrations

The High Authority notes that the initial completeness of the referral files received is improving. The proportion of opinions of inadmissibility, lack of jurisdiction, or lack of grounds for decision opinions, compared to the total number of opinions issued in 2024, has thus returned to a more controlled level (5.2%), after a slight increase in 2023 (12.6%, compared to 3.8% in 2022).

Managed and improved processing times

Despite the very high number of referrals received in 2024, the High Authority met the deadlines imposed on it and improved some of them. Thus, opinions prior to appointment were issued within an average of eight days⁴, while opinions relating to revolving-door movements to the private sector were issued within an average of 42.1 days⁵.

An overall stability in revolving door control

Of all the opinions issued by the High Authority in 2024 following public-private sector revolving-door movements projects referred to it, the proportion of compatibility opinions with reservations remained broadly stable, down slightly for the first time in four years. As in

previous years, the High Authority issued over 95% compatibility opinions, including 74.3% with reservations (excluding opinions of inadmissibility, lack of jurisdiction, and dismiss opinions). For the first time in four years, the proportion of simple compatibility opinions increased slightly (21.3%, compared to 18% in 2023).

Regarding the reviews carried out by the High Authority prior to the appointment of certain ministerial cabinet members and public officials, these resulted in the delivery of 293 opinions. Excluding opinions of inadmissibility, incompetence, and no need to rule opinions, 71.3% of these opinions were compatibility opinions with reservations, and 28.7% were simple compatibility opinions, i.e., Proportions that are roughly identical to those in 2023.

The High Authority issued ten opinions on applications for combining activities for business creation, six of which resulted in compatibility opinions with reservations.

Regarding projects for revolving-door movements of public officials and agents in the private sector, the High Authority issued 336 opinions. The share of incompatibility opinions out of the total number of opinions issued (excluding opinions of inadmissibility and incompetence) is generally stable (8.5% in 2024 – or 27 opinions – compared to 7.2% in 2023). 9 out of the 27 incompatibility opinions were motivated by the presence of an ethical risk, 16 by the presence of a criminal risk to the person concerned and 2 were issued on the basis of these two combined risks. A significant proportion of the opinions were issued on the basis of an optional referral issued according to a principle of subsidiarity by administrations, confirming the interest of the system for administrations.

3. Compared with 418 in 2023 ; **4.** Compared with 10,7 in 2023 ; **5.** Compared with 43,6 in 2023

Regulating lobbying

3,215

entities registered
in the directory
(as of 31/12/2024)

47



formal notices
to comply with
reporting obligations

15,633

activities
reported
in the directory
(for the 2023 financial year)

1



case referred to the
courts for non-filing
of declarations

112

controls
closed



75

controls of non-
registered entities

75% resulted
in registration
in the directory

37

controls of annual
declarations

100% resulted in changes
to the declarations

Compliance with reporting obligations

The relatively positive results of the reporting exercise, which concerned 2,618 representatives of interests, are the result of significant follow-up efforts conducted by the High Authority. As of 31 March, 59% of the lobbyists concerned had published a declaration of activities and resources; after an initial phase of informal reminders, this rate rose to 89%.

Contrary to the results observed in 2023, the High Authority was forced, in 2024, to repeatedly resort to the means at its disposal to obtain the submitting of missing declarations of activities and resources, in proportions close to those observed in 2022. Thus, 129 notifications of non-compliance⁶ were sent to representatives of interests at the end of the informal reminder phase, and then 47 formal notices⁷ were sent to those who had still not complied with their obligations despite the notification. The very low number of reports submitted to the courts (only one in 2024 for failure to submit a declaration of activities and resources) nevertheless highlights the effectiveness of the notification and formal notice procedure.

2023 Declarations report: a sustained activity

The 2024 report for the 2023 reporting period highlights the increase in the number of representatives of interests who published information in the directory during 2023⁸, as well as the average increase in the number of activities⁹ declared. In total, 15,633 activities were completed, an increase of 15%. The report also reveals improved quality of declarations, with

more than 74% of declared objects meeting the minimum expected requirements. The sectors that concentrated the most of lobbying activities are agriculture and agri-food, the environment, and energy.

Monitoring the obligations of representatives of interests

The High Authority conducted 112 controls during 2024, including 75 controls of non-registered entities and 37 controls of annual declarations. 79% of controls of non-registered entities resulted in an entry in the register. All controls of declarations were followed by modifications, consisting either of a correction of the declared information or the publication of new activities.

2024 reporting period: significant improvement in the filing rate within the legal deadline

2,893 representatives of interests registered in the register and whose financial year ended on 31 December 2024 had until 31 March 2025 to declare their lobbying activities carried out in 2024, as well as the resources allocated to these actions. Nearly 68% filed their declaration within the legal deadline, a result that is significantly higher than the previous year (59% for the 2023 financial year) which can be explained by earlier and more numerous prior reminders than in previous years.

6. Compared with 79 in 2023 ; 7. Compared with 5 in 2023 ;

8. Compared with 2 322 in 2023 and 2 254 in 2022 ; 9. Compared with 8,6 in 2023 and 8 in 2022

Transparency of foreign influence actions and prevention of foreign influence risks

Behind this new mission,
the identification of
gaps and areas for
improvement in the
system for preventing
the risk of interference

As other democracies, France has been subject to a growing number of foreign influence and interference actions for several years. The High Authority was already in the position to assess certain forms of foreign influence exercised on public officials, through the management of the register of representatives of interests, the control of revolving-door movements related to foreign states or companies, and, finally, the monitoring of declarations by public officials that could lead to the identification of links with foreign states. However, these systems remained incomplete and did not ensure the traceability of foreign influence activities. Aware of these limitations, in 2023, the High Authority requested the OECD to analyze the French institutional and legislative framework

regarding foreign influence activities. Published on 22 April 2024, the OECD report recommended increasing the transparency and integrity of foreign influence activities to better prevent interference actions.

The High Authority's
participation in the
drafting of the law
of 25 July 2024

As part of the parliamentary work following the submission, on 6 February 2024, by Mr. Sacha Houlié, of a bill aimed at preventing foreign interference in France, the High Authority was heard on 7 March 2024, by the Law Committee of the National Assembly and then, on 7 May 2024, by the Law Committee of the Senate. Adopted on 25 July 2024, the law draws on the reflections of the Commission of inquiry into political, economic and financial interference by foreign powers, the work of the Parliamentary intelligence delegation, the Senate Commission of inquiry

on public policies in the face of foreign influence operations, as well as the work conducted by the OECD and the High Authority. It entrusts the High Authority with new missions in terms of risk prevention and transparency of foreign influence activities and makes it a central player in this new system.

A new digital register dedicated to foreign influence activities

The law entrusts the High Authority with the management and control of a digital register dedicated to influence activities carried out on behalf of a foreign principal, in which the entities concerned must register and declare their activities as of 1 July 2025. This *ad hoc* register includes a broader scope of activities to be declared than that specific to representatives of interests. The system also requires certain organisations that conduct analyses or provide expert opinions on any subject related to national public policy or foreign policy, as well as certain establishments working with a foreign partner and whose mission is to disseminate a foreign language and promote cultural exchange, to declare the donations and payments they receive from any foreign power or legal entity outside the European Union.

Review of the risk of foreign influence when controlling revolving-door movements of certain senior public officials

Under the law of 25 July 2024, the High Authority is now required to review the risk of foreign influence posed by the revolving-door movements' projects to the private sector of public officials mentioned in Article 23 of the law of 11 October 2013 on transparency in public life. The timeframe for assessing this risk is set at five years, a longer period than the three-year period covering criminal and ethical risks.

Summary of proposals



Develop reporting requirements (assets, interests, financial instruments) and strengthen the High Authority's powers to control declarations

Provide the High Authority with specific powers to impose administrative sanctions in the event of failure to comply with the obligation to submit a declaration of assets or interests by a public official or agent.

Allow the High Authority to directly exercise its right of communication with banking or financial institutions, insurance or reinsurance companies, administrations, local authorities, and any person charged with a public service mission.

Grant the High Authority specific and direct access to certain databases established by the tax administration.

Simplify the content of the declaration of assets by merging certain sections and specifying certain required information.

Simplify the requirement for certain public officials to delegate the blind management of their financial instruments to a third party by creating a threshold triggering this obligation and allowing financial instruments unrelated to the official's sector of activity to be retained as they are or to transfer all financial instruments likely to be subject to the blind management obligation within a short period of time following the assumption of office, with the authorisation and supervision of the High Authority.

Reduce the deadline for submitting declarations of interests by members of the Government with the High Authority to eight days following their appointment in order to effectively prevent the risk of conflicts of interest and to secure government action.

End the requirement for members of the Government **to submit a declaration of interests at the end of their functions.**



Evolve and strengthen the control revolving-door movements between the public and private sectors

Provide that the High Authority's opinions regarding oversight of public sector revolving-door movements be notified to the Ethics officer who has previously ruled on the professional transition project.

Allow the High Authority to obtain any information useful for monitoring its opinions from the current or former administration of the public sector employee, as well as from the entity joined upon leaving public service.

Amend Article 23 of the Law of 11 October 2013, to allow the High Authority to qualify its opinions when it issues a decision, within five years of leaving office, on a professional transition project involving a risk of foreign influence.



Modify representation of interests regulation

Grant the High Authority the power to impose administrative sanctions in the event of failure by representatives of interests to submit a declaration of activities and resources.

Simplify and clarify the scope of representation of interests, in particular by removing the criterion of contact at the representatives of interests' initiative and simplifying the thresholds for triggering the reporting obligation. Furthermore, the reporting requirements should be revised, in particular by increasing the reporting frequency (from annual to semi-annual) and improving the level of detail of the information to be reported.


Grant the High Authority the right to communicate with public officials and entities targeted by representation of interests actions and introduce an obstruction offense or an administrative sanction in the event of obstruction of the control of lobbyists' reporting and ethical obligations.



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