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**NOTE**

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From: General Secretariat of the Council  
To: Delegations

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Subject: Draft 24th annual report of the Council on the implementation of Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents

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# COUNCIL ANNUAL REPORT

## ON ACCESS TO DOCUMENTS – 2025

### I. INTRODUCTION

This is the 24th annual report on the implementation of [Regulation \(EC\) No 1049/2001](#) of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents. It has been drawn up pursuant to Article 17(1) of that Regulation<sup>1</sup>. The report describes trends in requests for access to Council documents in 2025 and reviews complaints to the Ombudsman and rulings handed down by the European courts in cases concerning the institutions' implementation of the Regulation.

The statistical data that provide the basis for this report are available as [open data on the Council's website](#).

### II. LEGISLATIVE TRANSPARENCY

2025 saw a logical increase in legislative activity in relation to the previous year, demonstrating the return to a level relative to that point of the legislative cycle in the first fully operative year of a newly constituted European Parliament, yet with superior activity levels. This can be seen in the number of negotiating mandates granted, 74, which represents a 30% increase in relation to 2024. With the appointment processes for *rapporteurs* still ongoing in some cases, the European Parliament was not in a position in 2025 to adopt its negotiating mandate in 13 files for which the Council already had a negotiating mandate, thus preventing the opening of negotiations for those files.

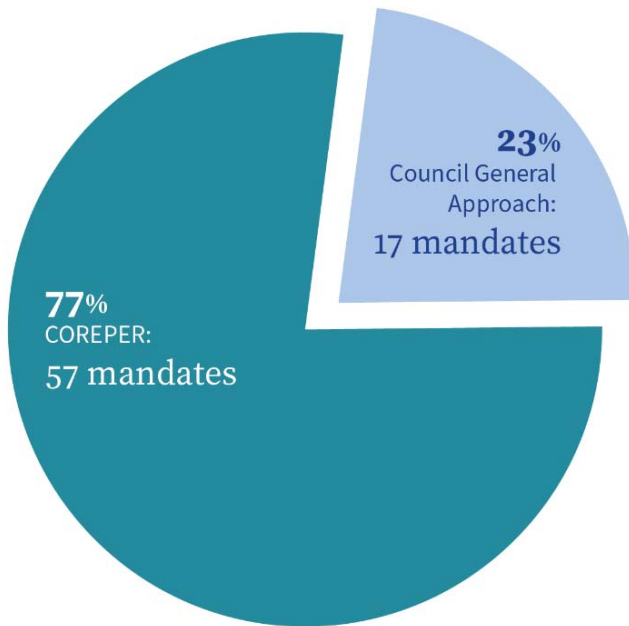
In line with the Coreper [approach](#) on strengthening legislative transparency, all Council mandates were public. The final outcome of negotiations was made public for the 44 files concerned, either after Coreper endorsement (43) or with the offer letter sent to the European Parliament Committee Chair (1) or both (27).

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<sup>1</sup> That article states that *'Each institution shall publish annually a report for the preceding year including the number of cases in which the institution refused to grant access to documents, the reasons for such refusals and the number of sensitive documents not recorded in the register.'*

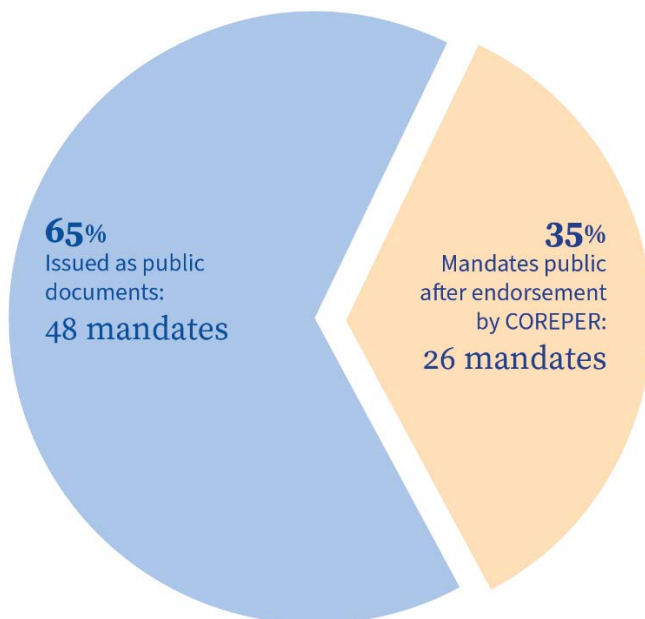
Initial Council negotiating mandates granted in 2025 for trilogues

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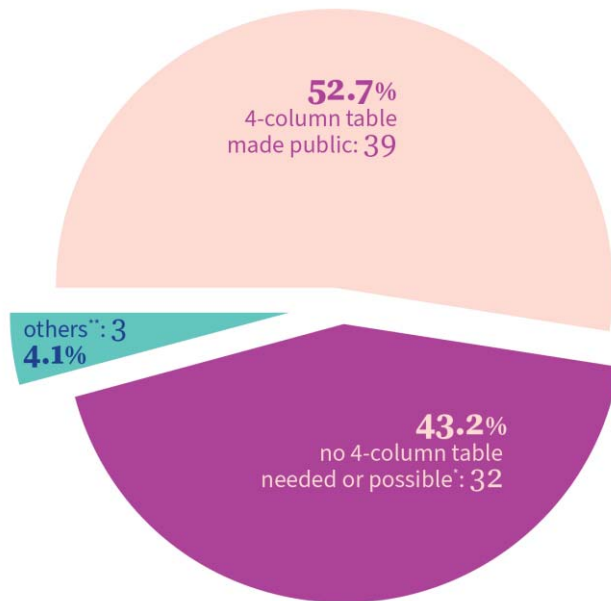


Initial Council mandates granted in 2025 for trilogues and made public

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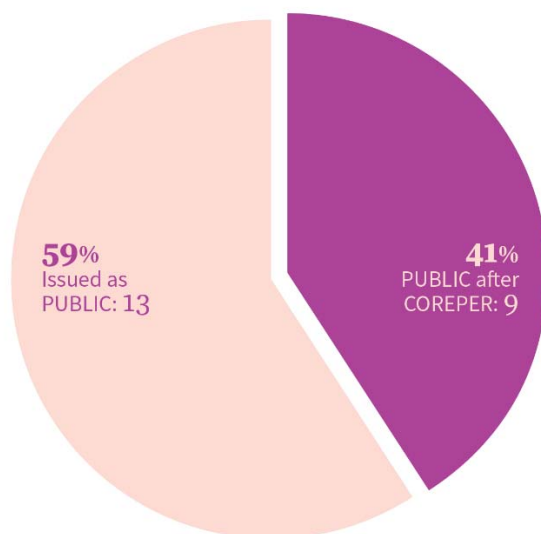
## Initial 4-column tables prepared for negotiating with the Council mandates granted in 2025



\* Negotiations on a legislative file cannot start before the two co-legislators have each a mandate. In 2025, the European Parliament was not in a position to adopt its negotiating mandate in 13 files for which the Council already could. As a result, the 4-column table could not yet be produced for these 13 files. In addition, negotiations do not necessarily require the production of a 4-column table. In particular, in 2025, agreement was reached without trilogues in 14 files, or with urgency in 4 files. And, in one case, the European Parliament did not enter into negotiations but instead rejected the Commission proposal (2023/0413(COD)).

\*\* In 3 cases, the initial 4-column table included negotiating elements in the fourth column and therefore could not have been made public at the time.

## Progress reports in 2025



### **III. REQUESTS FOR ACCESS TO DOCUMENTS IN 2025**

#### **1. The public register**

In 2025, the register attracted 3.1 % of the Council website's traffic. It was consulted more than 233 000 times. Of the total number of visitors, which amounted to more than 125 000, 74 % had come via a direct link, 21 % had arrived at the register through web search engines, 2.9 % had been redirected from another website, 0.9% from emails and 0.4% from collaborative tools, 0.3 % from generative AI and 0.2 % from social media. Regarding the main countries of origin of the visitors, 26 % of the visitors were based in Belgium, 6.9 % in Germany, 5.8 % in the Netherlands, 5.6 % in the United Kingdom, 5.5 % in France, 5 % in Spain, 4.8 % in Italy, 4.2 % in Luxembourg and 3.9 % in Poland.

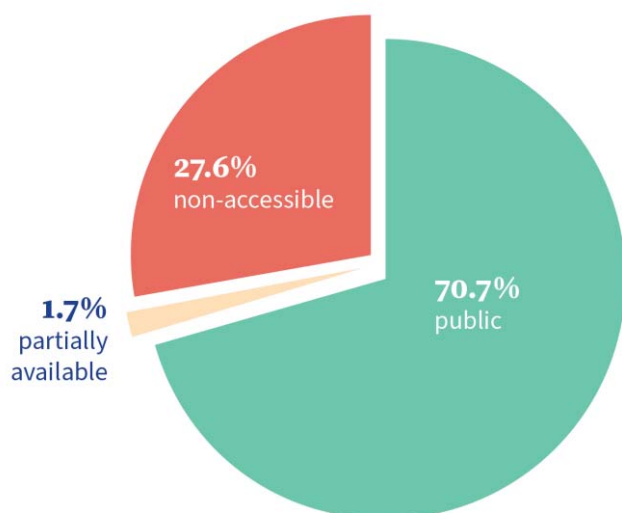
On 31 December 2025, the public register listed 594 005 original-language documents (4 232 457 documents, including all language versions). Of the total number of original-language documents listed in the register, 70.7 % (419 857 documents) were public and available to download.

Since 1 January 2025, WK documents (i.e. documents for specific communities of users created for one of the Council's preparatory bodies or a specific subject) have been directly referenced in the public register which means that the public is aware of their existence straightaway whereas, in the past, they were compiled in lists which were issued later. These lists were usually issued twice a year.

As for other types of documents (e.g. ST or CM documents), if public, WK documents are available to download in the register. In addition, WK documents which were issued before 2025 and which were made fully public are also available to download.

## Documents available in the public register

on 31 December 2025



In 2025, 68 259<sup>2</sup> original-language documents were added to the register, of which 57.6 %, or 39 337 documents, are public and available to download. In 2025, the Council issued 12 710 documents that were available to the public upon circulation. It added to the register 1 168 documents that are partially available to the public.

In 2025, 391 classified documents<sup>3</sup> were referenced in the register, and the Council issued 1 008 classified documents that are not listed in the register.

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<sup>2</sup> This figure includes a large number of WK documents which were issued before 2025 but which were added to the register of documents in 2025.

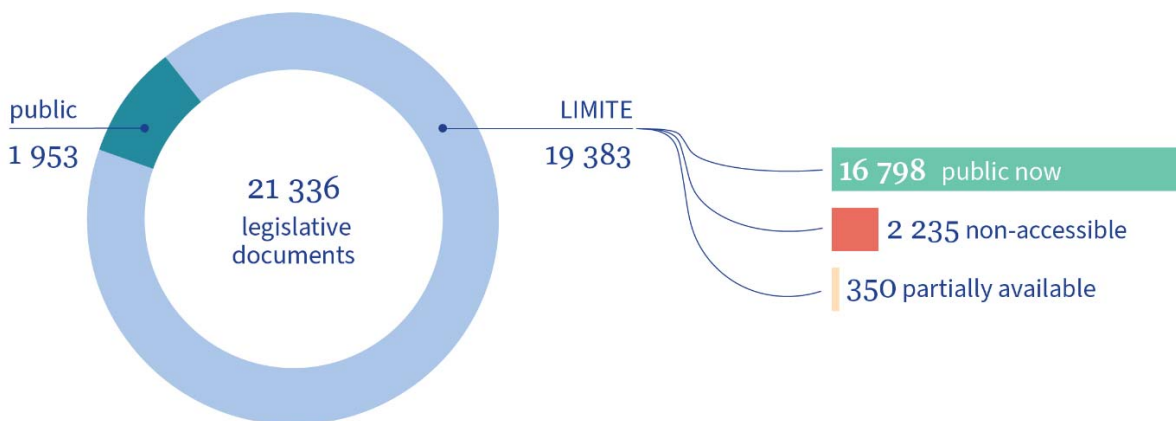
<sup>3</sup> See [Council Decision 2013/488/EU](#) of 23 September 2013 on the security rules for protecting EU classified information (OJ L 274, 15.10.2013, p. 1).

## Legislative documents

During the period covered by this report, 21 336<sup>4</sup> legislative documents<sup>5</sup> were added to the register, 1 953 of which were issued as ‘public’ upon circulation. Of the remaining 19 383 legislative documents issued as LIMITE (with a reference in the register but not directly accessible), 16 798 documents were made public. Thus 87.9 % of the legislative documents added to the register in 2025 are fully available to the public.

### Legislative documents issued in 2025

total of 21 336 documents



<sup>4</sup> This figure includes 17 557 WK documents which are LIMITE by default.

<sup>5</sup> According to Article 12 of Regulation (EC) No 1049/2001, legislative documents are documents drawn up or received in the course of a legislative procedure.

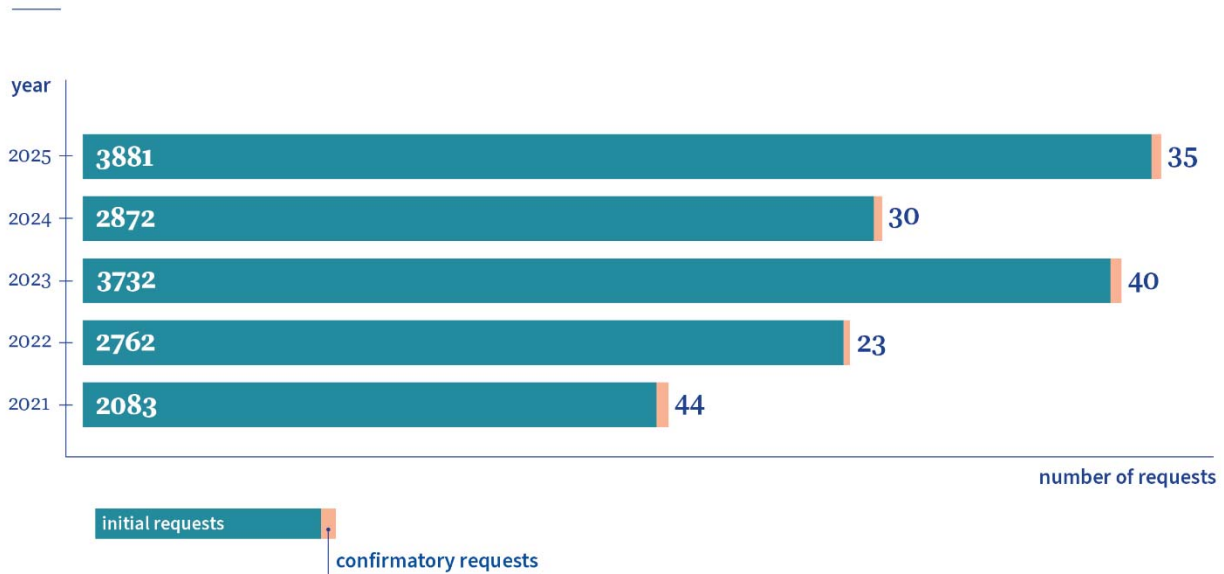
## 2. Requests for access to documents

In 2025, the Council received the record number of **3 881** initial requests for access to documents and 35 confirmatory applications<sup>6</sup>, which required the analysis of 11 952 documents.

In 2025, the 3 881 initial requests were submitted by 1 159 applicants.

### Number of requests

evolution from 2021 to 2025



In 2025, the GSC was consulted by the European Parliament and by the European Commission on 298 documents. As for the individual applicants, the five applicants who requested the most documents requested a total of 1 469 documents, which represents 12.3 % of the requested documents.

As for the number of requests submitted, the eight biggest applicants submitted 842 requests which represents 21.7 % of the number of requests and 13.3 % of the requested documents. Interestingly, these eight applicants work for the same public affairs consultancy. It should however be noted that a large majority of applicants only submitted requests for access to very few documents (between 1 and 10).

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<sup>6</sup> In the event of a total or partial refusal, the applicant may, within 15 days of receiving the institution's reply, make a confirmatory application asking the institution to reconsider its position.

Number of requested documents  
evolution from 2021 to 2025



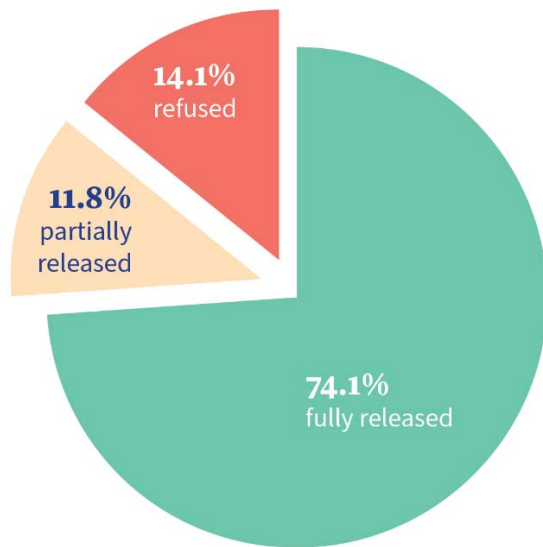
In 2025, the policy areas of the requests were split as follows:



\* The 1.5% allocated to Education, Youth, Audiovisual, Culture and Sport breaks down as follows: Education/Youth (0.7%), Audiovisual (0.6%), and Culture (0.2%).  
 † Under Justice and Home Affairs (15.2%), smaller components are not displayed in the chart: Internal security and counter-terrorism (0.3%), Fundamental rights and values (0.2%), Human rights (0.1%) and Rule of Law (0.1%).  
 ‡ MFF: Multiannual Financial Framework

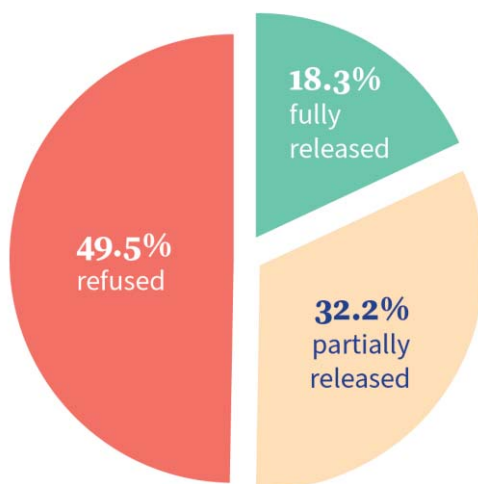
At the initial stage, full access was granted to 8 863 documents (74.1 %) and partial access to 1 181 documents (11.8 %). Access to 1 682 documents (14.1 %) was refused.

Type of access granted at the initial stage  
in %



Following confirmatory applications, full access was granted to 17 documents (18.3 %) and partial access to 30 documents (32.2 %). The Council confirmed that access to 46 documents should be refused (49.5 %).

Type of access granted at the confirmatory stage  
in %



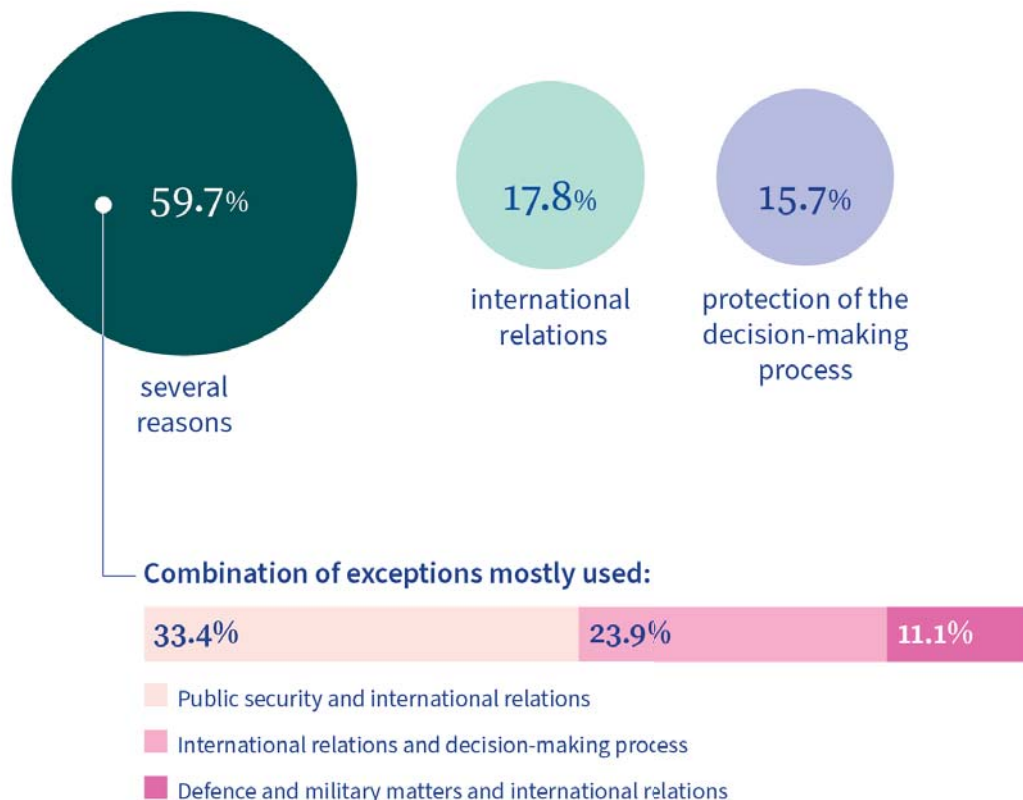
## Exceptions used to refuse access

At the initial stage, access was mainly refused on the basis of a combination of several exceptions (in 59.7 % of cases (989 times). In those cases, access was denied mainly in order to protect the public interest as regards the public security and international relations (331 times or 33.4 %), or to protect the public interest as regards international relations and the decision-making process (236 times, or 23.9 %). A combination of protecting the public interest as regards defence and military matters and international relations was applied 110 times, or in 11.1 % of the cases in which several exceptions were applied.

Access was also refused mainly in order to protect the public interest as regards international relations (294 times, or 17.8 %) and to protect the Council's decision-making process (260 times, or 15.7 %).

### Main exceptions used to refuse access at the initial stage

in %



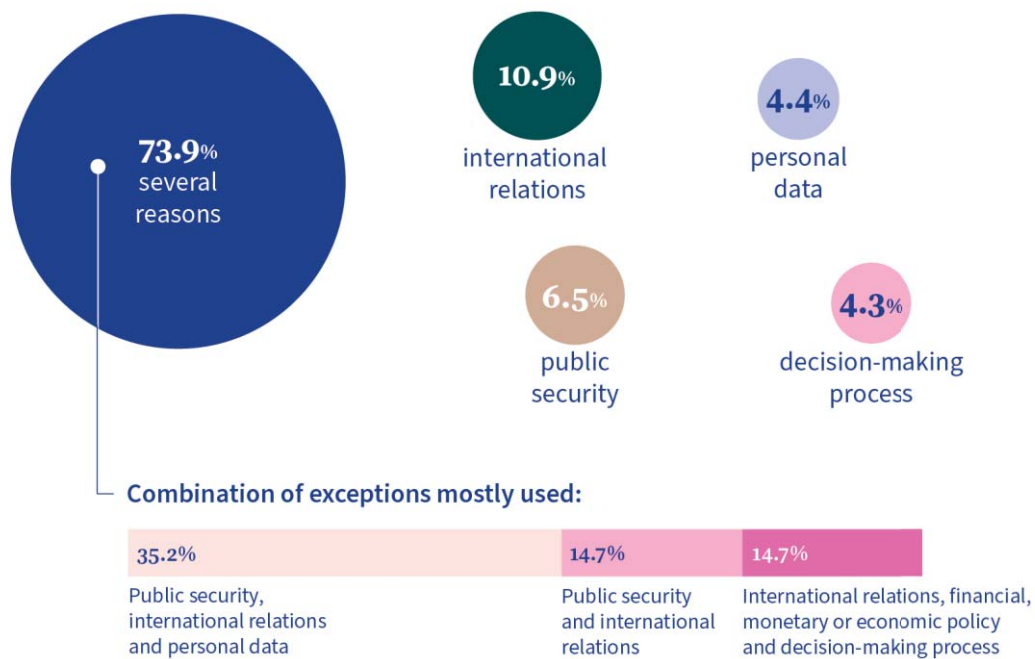
In more than 73 % of the cases, partial access was granted based on a combination of several exceptions.

The exception most frequently used to justify the granting of partial access only was the protection of the public interest as regards international relations (9.4 %), followed by the protection of the institution’s decision-making process (6 %).

At the confirmatory stage, access to documents was totally refused in the large majority of cases due to a combination of exceptions (73.9 %). Access was also totally refused to protect international relations (10.9 %) and public security (6.5 %).

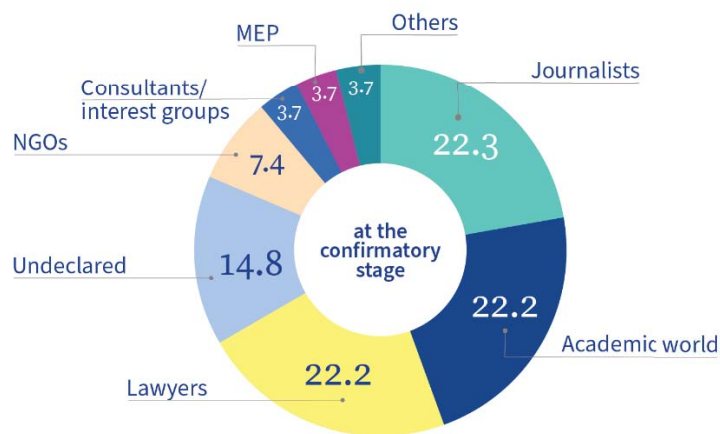
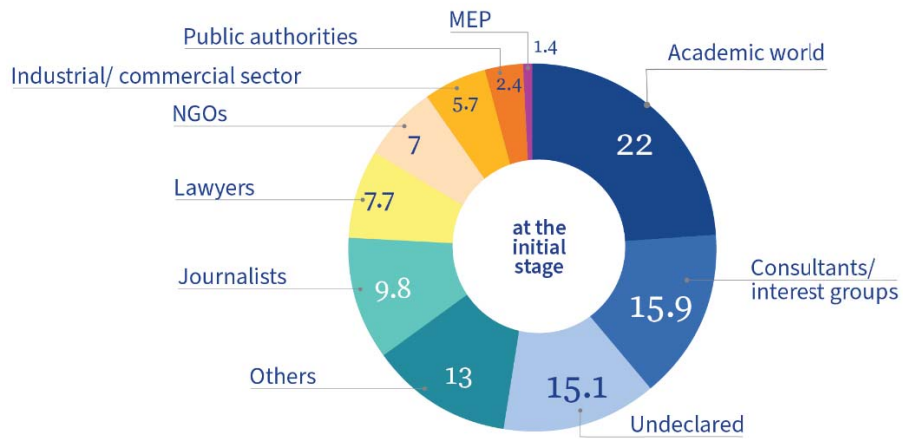
### Exceptions used to refuse access at the confirmatory stage

in %



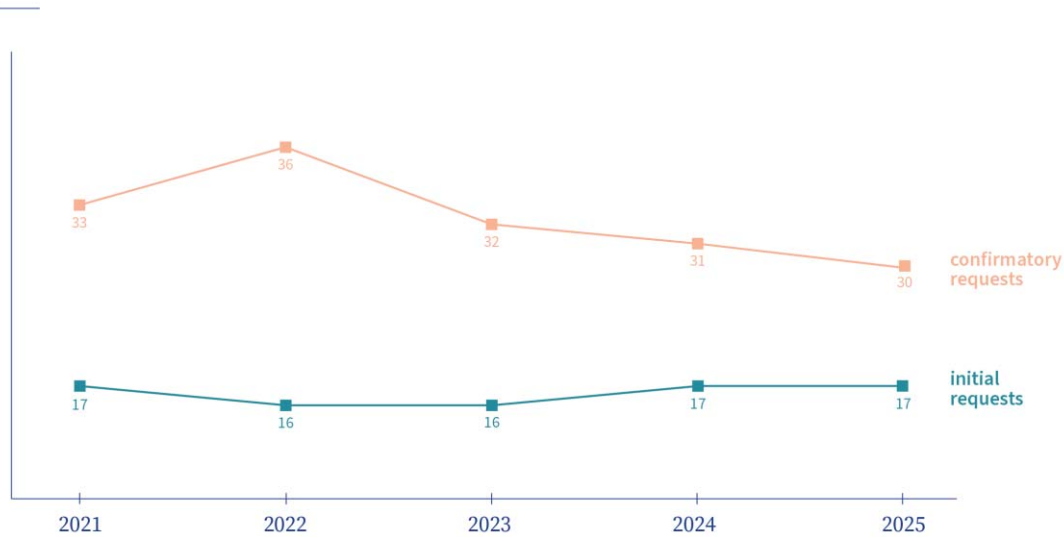
Access to documents was partially refused mainly due to a combination of exceptions (in 86.7 % of cases).

Self-declared professional profile of the applicants in 2025  
at the initial and at the confirmatory stage (in %)



It took the GSC on average 17 working days to process initial requests and 30 working days to process confirmatory applications.

Average working days for the GSC to process requests  
evolution from 2021 to 2025



The deadline of 15 working days for processing initial requests was extended for 1 440 requests, i.e. in 37.1 % of cases. The deadline was extended for all confirmatory applications (except for one which was withdrawn).

The tables in the Annex give further details on requests for access to documents.

#### **IV. COMPLAINTS LODGED WITH THE EUROPEAN OMBUDSMAN, OWN-INITIATIVE INQUIRIES AND STRATEGIC INITIATIVES BY THE EUROPEAN OMBUDSMAN AND LEGAL ACTION IN THE FIELD OF TRANSPARENCY/ACCESS TO DOCUMENTS AND REQUESTS FOR INFORMATION**

##### **1. Complaints lodged with the European Ombudsman**

In 2025, the Council was notified of two complaints lodged with the European Ombudsman following a request for access to documents addressed to the Council. Details of those requests are set out below.

###### ***Complaint 2193/2025/MAS***

This case relates to a complaint from a lawyer addressed to the European Ombudsman following the Council's decision to refuse access to seven documents (including one classified document) entirely and to extend the partial access already given to three documents relating to the compatibility of the automatic exchange of tax information with third countries and its interaction with the General Data Protection Regulation (EU) 2016/679 ('GDPR').

In October 2025, the Ombudsman opened an inquiry<sup>7</sup> into the matter. In November 2025, the Ombudsman carried out an inspection of the non-classified documents to which access had been (partially) refused.

As regards the classified document, COREPER decided in January 2026 to allow the Ombudsman to inspect it in accordance with the Council's security rules. This inspection took place on 28 January 2026 on the Council's premises and in the presence of Council officials.

As a follow-up to this inspection, the Ombudsman's services sent the Council the inspection report and requested a meeting with GSC officials with a view to obtaining additional explanations of the reasons why access to the documents was denied.

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<sup>7</sup> ST 14702/25

## *Complaint 2976/2025/AGU*

This case relates to a complaint from a citizen addressed to the European Ombudsman following the Council's decision to refuse access to three documents in the context of the request of the Spanish authorities to amend Regulation [1/1958](#) to include Catalan, Basque and Galician as EU official languages. The Ombudsman opened an inquiry into the matter in November 2025.

In the context of this inquiry<sup>8</sup>, the Council conducted a renewed assessment and proceeded with new consultations in relation to access to the three documents which was refused at the confirmatory stage. In December 2025, COREPER suggested that the Council grant public access to the three requested documents. The Council granted this public access in January 2026 and the GSC sent the requested documents to the complainant. In February 2026, the European Ombudsman closed the case<sup>9</sup> with the conclusion that it had been settled.

## **2. European Ombudsman's own-initiative inquiry OI/4/2023/MIK**

In October 2023, the European Ombudsman initiated an own-initiative inquiry on the handling of requests for public access to legislative documents<sup>10</sup>. The Ombudsman asked the Council specifically to provide her with statistical information about the processing of access to documents requests for three legislative files. The GSC gathered the requested data on the basis of the information available in the database for access to documents and sent a reply to the Ombudsman on 6 December 2023.<sup>11</sup>

By letter to the Secretary General of the Council of 20 March 2024<sup>12</sup>, the Ombudsman asked to inspect a sample of decisions issued by the GSC consisting of all initial decisions in which either partial access to documents was granted, or access was refused as well as 15 decisions in which full access was granted to all the requested documents. The Council replied to this request on 10 April 2024 providing the documents for inspection.

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<sup>8</sup> [ST 15166/25](#)

<sup>9</sup> [ST 6734/26](#)

<sup>10</sup> [ST 13836/23](#)

<sup>11</sup> [ST 15494/23](#)

<sup>12</sup> [ST 8344/24](#)

The Ombudsman issued her decision<sup>13</sup> in this own-initiative inquiry on 3 December 2024. Based on the files inspected, the Ombudsman found that the Council was failing to give full effect to the principle of legislative transparency, as set out in the EU Treaties, Regulation 1049/2001, and related case-law. To help the Council improve its practices in that respect, the Ombudsman made some suggestions for improvement and asked the Council to inform her Office by 3 June 2025 of any action it had taken in relation to her suggestions for improvement. The Council sent its reply to the Ombudsman on 2 May 2025<sup>14</sup>.

### 3. European Ombudsman’s strategic initiatives

#### *SI/3/2024/MIG*

Following up on her 2019 inquiry into the issue of sponsorship of the Presidency of the Council of the EU, which had led to the General Secretariat of the Council (GSC) issuing the “Guidance for Presidency best practice on the use of sponsorship”<sup>15</sup> in June 2021, the European Ombudsman (EO) wrote to the Secretary General of the Council on 15 March 2024 asking for a meeting to discuss the Council’s experience with the Guidance<sup>16</sup>.

The meeting between representatives of the GSC and members of the EO’s office took place on 12 June 2024. On 9 September 2024, the EO sent the Secretary General of the Council a closing note<sup>17</sup> on the strategic initiative on sponsorship of the Presidency of the Council of the European Union .

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13 [ST 16605/24](#)

14 [ST 8181/1/25 REV 1](#)

15 [ST 10325/21](#)

16 [ST 8298/24](#)

17 [ST 13263/24](#)

In this note, the EO called on the Council to assess how the guidelines were being implemented and expressed two main concerns. The first was an alleged lack of transparency around the identity of sponsors and the exact terms of each sponsorship agreement. The second concerned the use by sponsors of Presidency logos, that may contain the EU flag. Such uses could, in the EO's view, confuse the public (which cannot always distinguish between official Council meetings and informal events organised by the Presidency) about the relationship between the sponsors and the European Union and cause reputational damage to the Council. On this basis, the EO noted that there were still concerns in that respect and "encouraged the Council to assess how best to address these when taking stock of the implementation of the Guidance at the next possible opportunity."

The Working Party on Information (WPI) had an exchange of views on the EO's note on 4 October 2024.

On 7 April and on 19 June 2025, the WPI had another exchange of views on the EO's closing note dated 9 September 2024.

On 3 July 2025<sup>18</sup>, the Coreper Chair wrote to the EO in response to that closing note. It was mentioned that in those exchanges, "*a number of delegations indicated their willingness to explore appropriate measures to address the concerns expressed by the European Ombudsman in her closing note regarding the implementation of the Guidance on the use of Sponsorship. The Council will reflect on how to further consider such measures with a view to addressing the concerns expressed in the context of a future update of the Guidance.*"

On 13 August 2025, the EO wrote to the General Secretary of the Council. In her letter<sup>19</sup>, the EO indicated that she welcomed the fact that the Council was considering how the concerns raised in her note closing her strategic initiative could be addressed and looked forward to hearing about the outcome of the Council's reflections. On 22 September 2025, the WPI was informed of this letter.

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<sup>18</sup> [ST 10706/25](#)

<sup>19</sup> [ST 12203/25](#)

#### 4. Court cases

In 2025, there were three court cases pending before the Union courts challenging the legality of Council decisions refusing to grant public access pursuant to Regulation (EC) No 1049/2001, all before the General Court.

In case **T-590/23 De Capitani v Council**, the applicant sought the annulment of the Council's decision to refuse public access to two WK documents (WK 1505/2023 and WK 1513/2023) containing compilations of comments from Member States which were produced in two legislative files falling within the Migration and Asylum reform. Public access was refused based on Article 4(3) of Regulation 1049/2001 in order to protect the ongoing decision-making process, as the two legislative procedures were still ongoing at the time of the decision. In its Judgment of 29 October 2025, the General Court found that the reasoning set out in the decision was of a general and abstract nature without evidence that disclosure would undermine the decision-making process, adding that the Council could have set out the content of those documents and the particular context of each of the legislative proposals in question without revealing the specific positions of the MS. It considered the reasoning of the Council was limited and based on hypothetical risks. The decision was annulled.

However, the General Court dismissed the remainder of the action, through which the applicant was seeking the publication of 34 other documents to which access was granted to him in the public register. At the time, the public register did not automatically include WK documents. The General Court considered that line of the claim inadmissible as the right of access to documents guaranteed by Article 2(1) of Regulation 1049/2001 does not include the publication of documents in the register of the institution concerned. An institution cannot be required to publish a document in its register by means of an application for access to documents.

The applicant has appealed the judgment, appeal proceedings are pending at the Court of Justice (case C-13/26 P).

In case **T-255/24 Nouwen v Council**, the applicant sought the annulment of the Council's decision to refuse access to certain documents pursuant to Regulation (EC) No 1049/2001. The applicant claimed that the request for access was handled in an incomplete or negligent way. In addition, the applicant claimed that the Council did not duly justify the refusal of access and that the exceptions relating to international relations (Article 4(1)(a) third indent) and financial or economic policy of the EU (Article 4(1)(a) fourth indent) were wrongly applied.

In its judgment of 10 September 2025, the General Court partially annulled the Council's decision on the applicant's confirmatory application. In its judgment, the General Court rejected the applicant's plea relating to the incomplete or negligent handling of the request for access. With regard to the application of the exceptions invoked, the General Court considered that the Council was well founded in refusing access to certain limited parts of the requested documents, as refusing access to those parts would present a reasonably foreseeable, and not purely hypothetical, risk to the interests protected by the exceptions provided for in the third and fourth indents of Article 4(1)(a) of Regulation (EC) No 1049/2001. However, the General Court found that the Council wrongly applied those exceptions for the rest of the requested documents. Additionally, it considered that the Council made a manifest error of assessment when it found that partial access under Article 4(6) of Regulation (EC) No 1049/2001 could not be granted to those parts of the documents.

The applicant has appealed the judgment, appeal proceedings are pending at the Court of Justice (case C-740/25 P).

In Case **T-376/24, Daldewolf and EQ v Council**, the applicants sought the annulment of the Council's decision to partially refuse access to certain documents pursuant to Regulation (EC) No 1049/2001. The applicants claim that the Council was not entitled to rely on the exception for the protection of international relations under the third indent of Article 4(1)(a) in this case. In addition, the applicants claim that the Council infringed its obligation to justify its decision when it replied that it did not hold any documents that respond to part of the request. The case is still pending before the Court.

## **V. PUBLICATION OF DOCUMENTS PURSUANT TO ARTICLE 11(6) OF ANNEX II TO THE COUNCIL'S RULES OF PROCEDURE**

The GSC made public 1 226 preparatory documents relating to 59 legislative acts that were adopted in 2025 or earlier.

## **VI. VOTING RESULTS**

In 2025, the GSC prepared voting results for all the legislative acts that had been adopted by the Council over the year (i.e. 73); those voting results are directly available on the [Council's website](#).

## **VII. REQUESTS FOR INFORMATION**

The General Secretariat of the Council receives requests for information in the 24 EU official languages, not only from citizens based in the EU but also from other parts of the world. These requests are submitted via different channels including a web form (available on the Council website), emails, and postal letters. The Public Information Service is responsible for replying to these requests for information.

The analysis of these requests provides useful insight into the issues that most frequently prompt citizens to contact the GSC. Examining the distribution of enquiries by topic also helps to identify areas of particular public interest and recurring practical questions addressed to the institution.

In 2025, the GSC responded to 7 324 requests for information, distributed as follows:

- 6 928 emails (including those received via the web form and email)
- 396 letters.

Of these, 908 requests were specifically addressed to the President of the **European Council** (PEC).

The overall number of requests has increased by more than 11 % compared to the previous year.

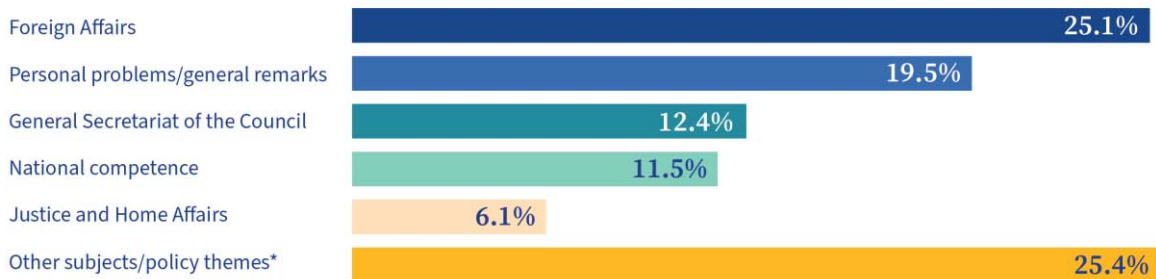
## Number of requests for information

evolution from 2021 to 2025



The requests received by the GSC related to different EU policy themes and a variety of other subjects as well. In 2025, the main areas concerned by these requests were the following:

### Main policy areas of requests for information in 2025



\*e.g., Employment, Social Policy, Health and Consumer Affairs, Environment, Transport, Telecommunications and Energy, Competitiveness, Economic and Financial Affairs, etc.)

**Foreign affairs** remained the most prominent policy area among requests received by the Public Information Service, accounting for approximately one quarter of all enquiries (25.1%). Many of these requests related to ongoing international developments, particularly the war in Ukraine and the situation in the Middle East, including Gaza.

Requests relating to **personal situations or general remarks** represented the second largest category (19.5 %). These often involved individuals seeking advice or assistance with personal matters that fall outside the competence of the Council.

Enquiries concerning the **General Secretariat of the Council** accounted for 12.4 % of requests and largely consisted of practical questions regarding traineeships, visits to the Council, contact details of officials, and requests addressed to the President of the **European Council**.

Questions falling under **national competence** represented 11.5 % of requests and typically concerned issues such as consumer disputes, driving licences, or social assistance, which are handled by national authorities.

### **Frequently raised individual topics**

Beyond broad policy categories, several specific topics generated a significant number of enquiries.

The most frequent policy-related subject was the **European Disability Card**, which prompted a large number of questions regarding its implementation and practical use. Other recurring themes included the **seasonal clock change** and **EU trade policy issues**, such as discussions related to the EU–Mercosur agreement and forced labour regulations.

### **Unprocessed Requests**

A significant number of emails and letters received by the GSC were classified as spam, incomprehensible, or lacking a valid contact address. In 2025, the total number of cases with no follow-up was 91.

**VIII. OCCASIONAL ATTENDANCE BY THIRD PARTIES, INCLUDING INTEREST REPRESENTATIVES, AT MEETINGS OF THE COUNCIL OR ITS PREPARATORY BODIES**

Point iv of the Secretary-General's guidelines of 22 July 2021 on the above topic states that the Council's annual report on access to documents should include relevant information about the attendance of interest representatives at meetings of the Council or its preparatory bodies.

In 2025, 253 interest representatives were authorised by the Permanent Representatives Committee to attend one or more meetings of the preparatory bodies of the Council. The interest representatives belonged to the following categories:

Non-governmental organisations and charities	152
Think tanks and academic institutions	36
Associations and networks of public or mixed entities	33
Trade and business associations	18
Consultancy and companies	13
Trade unions and professional associations	1

The entities authorised to attend the meetings of the preparatory bodies of the Council are identified in the agendas of the relevant preparatory bodies, which can be consulted in the register of Council documents.

In addition, 13 persons were invited to attend meetings of the preparatory bodies of the Council as individual experts or academics.

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**1. Number of initial requests pursuant to Regulation No 1049/2001**

2021	2022	2023	2024	2025
2 083	2 762	3 732	2 872	3 881

**2. Number of documents requested through initial requests**

2021	2022	2023	2024	2025
10 189	10 902	13 912	10 096	11 952

**3. Documents released by the General Secretariat of the Council at the initial stage**

2021		2022		2023		2024		2025	
9 011		9 019		12 508		8 504		10 270	
partial 519	full 8 492	partial 955	full 8 064	partial 1 600	full 10 908	partial 1 181	full 7 323	partial 1 407	full 8 863

**4. Number of confirmatory applications**

2021	2022	2023	2024	2025
44	23	40	30	35

**5. Number of documents considered through confirmatory applications**

2021	2022	2023	2024	2025
210	163	146	126	93

**6. Documents released by the Council at the confirmatory stage**

2021		2022		2023		2024		2025	
113		82		98		81		47	
partial 54	full 59	partial 36	full 46	partial 45	full 53	partial 45	full 36	partial 30	full 17

**7. Rate of documents released during the whole procedure (full release / full + partial release)**

2021		2022		2023		2024		2025	
83,9%	89,5%	79%	88,7%	80%	92%	78,3%	91,3%	74,4%	86,5%

**8. Professional profile of the applicants (initial requests)**

		2021		2022		2023		2024		2025	
Civil society/ Private sector	Consultants	6,9%	20,9 %	10,7 %	28,2 %	11,9 %	30,6 %	10,2 %	28,6 %	11,8 %	28,6 %
	Environmental lobbies	0,2%		0,1%		0,3%		0,1%		0%	
	Other groups of interest	3,3%		4,6%		5%		4,8%		4,1%	
	Industrial/ Commercial sector	5,2%		4,9%		7,4%		5,7%		5,7%	
	NGOs	5,3%		7,9%		6%		7,8%		7%	
Journalists		5%		6,8%		8,1%		10,8%		9,8 %	
Lawyers		4,7%		4,3%		7,1%		6,7%		7,7%	
Academic world		39%		33,3%		22,9%		23,9%		22%	
Public authorities (non-EU institutions, third-country representatives, etc.)		2%		3,2%		2,2%		3,2%		2,4%	
Members of the European Parliament and assistants		1,3%		0,4%		0,9%		0,7%		1,4%	
Others		15%		14,1%		11,9%		12,5%		13%	
Undeclared		12,5%		17%		16,3%		13,6%		15,1%	

## 9. Professional profile of the applicants (confirmatory applications)

		2021		2022		2023		2024		2025	
Civil society/ Private sector	Consultants	0%	6,2%	0%	13,7%	0%	6,4%	0%	4%	0%	11,1%
	Environmental lobbies	0%		4,6%		0%		0%			
	Other groups of interest	0%		0%		0%		4%			
	Industrial/ Commercial sector	3,1%		0%		3,2%		0%			
	NGOs	3,1%		9,1%		3,2%		0%			
Journalists		18,7%		4,6%		12,9%		32%		22,3%	
Lawyers		9,4%		4,5%		22,6%		4%		22,2%	
Academic world		25%		36,4%		16,1%		28%		22,2%	
Public authorities (non-EU institutions, third-country representatives, etc.)		0%		4,5%		0%		0%		0%	
Members of the European Parliament and assistants		0%		0%		0%		0%		3,7%	
Others		9,4%		4,5%		9,7%		4%		3,7%	
Undeclared		31,3%		31,8%		32,3%		28%		14,8%	

## 10. Geographic distribution of the applicants (initial requests)

Country	2021	2022	2023	2024	2025
Belgium	28,1%	30,5%	28,9%	30,9%	29%
Bulgaria	0,1%	0,1%	0,3%	0,3%	0,3%
Croatia	0,2%	0,4%	0,4%	0,3%	0,1%
Czech Republic	0,7%	0,5%	0,7%	0,3%	0,8%
Denmark	1,5%	1%	0,8%	1,4%	1,5%
Germany	12,4%	11,8%	11,6%	10,3%	8,5%
Estonia	0,2%	0,1%	0,1%	0,2%	0,1%
Greece	0,9%	0,2%	0,5%	0,5%	0,4%
Spain	4,9%	4%	3,7%	3,4%	3%
France	7%	7%	6,1%	6,4%	6,4%
Ireland	1%	0,8%	1,1%	1,7%	0,3%
Italy	5,6%	3,1%	4,9%	5,5%	3,8%
Cyprus	0,3%	0,2%	0,1%	0,1%	0,1%
Latvia	0,1%	0%	0%	0,1%	0,2%
Lithuania	0%	0,1%	0,2%	0%	0,2%
Luxembourg	0,8%	1,2%	0,8%	0,9%	0,5%
Hungary	0,1%	0,3%	0,5%	0,2%	0,5%
Malta	0,3%	0,2%	0,1%	0,1%	0,1%
Netherlands	5,6%	5,4%	5%	4,1%	4%
Austria	1,3%	1,8%	1,5%	1,9%	2%
Poland	1,8%	1,9%	1,4%	1,5%	2,2%
Portugal	0,8%	0,9%	0,5%	1,1%	0,5%
Romania	0,5%	0,4%	0,5%	0,4%	0,4%
Slovenia	0,2%	0,1%	0,1%	0,2%	0,1%
Slovakia	0,6%	0,2%	0,2%	0,3%	0,4%
Finland	1,2%	1,2%	1,1%	0,9%	1,2%
Sweden	1%	0,9%	1,7%	1,9%	1,2%
United Kingdom	4,4%	3,4%	2,4%	2,7%	3,2%
Third countries	5,5%	3,1%	3,1%	4,4%	4,1%
Undeclared	12,9%	19,2%	21,7%	18%	24,9%

## 11. Geographic distribution of the applicants (confirmatory applications)

Country	2021	2022	2023	2024	2025
Belgium	31,3%	18,2%	15,6%	36%	37,1%
Bulgaria	0%	0%	3,1%	0%	0%
Croatia	0%	0%	0%	0%	0%
Czech Republic	3,1%	4,5%	0%	4%	0%
Denmark	0%	0%	0%	0%	0%
Germany	3,2%	18,2%	15,6%	4%	11,1%
Estonia	0%	0%	0%	0%	0%
Greece	3,1%	0%	0%	0%	0%
Spain	3,1%	0%	0%	0%	7,4%
France	3,1%	9,1%	6,3%	4%	11,1%
Ireland	0%	4,6%	3,1%	0%	0%
Italy	3,1%	0%	0%	4%	3,7%
Cyprus	0%	0%	0%	4%	0%
Latvia	0%	0%	0%	0%	0%
Lithuania	0%	0%	0%	0%	0%
Luxembourg	0%	0%	0%	0%	0%
Hungary	0%	0%	6,3%	4%	0%
Malta	0%	4,5%	0%	0%	0%
Netherlands	12,5%	4,6%	9,4%	12%	0%
Austria	3,1%	0%	3,1%	0%	0%
Poland	0%	0%	0%	0%	0%
Portugal	3,1%	0%	0%	0%	3,7%
Romania	0%	0%	0%	0%	0%
Slovenia	0%	0%	0%	0%	0%
Slovakia	0%	0%	0%	0%	0%
Finland	9,4%	4,6%	3,1%	4%	3,7%
Sweden	0%	0%	0%	0%	0%
United Kingdom	3,1%	4,5%	6,3%	0%	3,7%
Third countries	0%	4,5%	0%	0%	3,7%
Undeclared	18,8%	22,7%	28,1%	24%	14,8%

## 12. Exceptions used to refuse access (initial stage)

Exceptions foreseen in regulation 1049/2001	2021		2022		2023		2024		2025	
	#	%	#	%	#	%	#	%	#	%
Protection of public interest as regards public security	87	8,2%	78	6,5%	50	4,5%	33	3,9%	23	1,4%
Protection of public interest as regards defence and military matters	4	0,4%	10	0,8%	7	0,6%	0	0%	10	0,6%
Protection of public interest as regards international relations	181	17%	208	17,4%	305	27,4%	211	24,7%	294	17,8%
Protection of public interest as regards the financial, monetary or economic policy of the Community or a Member State	0	0%	1	0,1%	4	0,4%	0	0%	20	1,2%
Protection of privacy and the integrity of the individual (protection of personal data)	10	0,9%	19	1,6%	7	0,6%	12	1,4%	14	0,8%
Protection of commercial interests of a natural or legal person, including intellectual property	27	2,5%	2	0,2%	1	0,1%	0	0%	11	0,7%
Protection of court proceedings and legal advice	9	0,8%	9	0,7%	23	2,1%	7	0,8%	33	2%
Protection of the purpose of inspections, investigations and audits	0	0%	0	0%	3	0,3%	0	0%	1	0,1%
Protection of the Institution's decision-making process	223	20,9%	307	25,6%	327	29,3%	267	31,3%	260	15,7%
Several reasons together	525	49,3%	563	47%	387	34,7%	324	37,9%	989	59,7%

### 13. Exceptions used to refuse access (confirmatory applications)

Exceptions foreseen in regulation 1049/2001	2021		2022		2023		2024		2025	
	#	%	#	%	#	%	#	%	#	%
Protection of public interest as regards public security	0	0%	0	0%	4	8,3%	0	0%	3	6,5%
Protection of public interest as regards defence and military matters	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of public interest as regards international relations	33	34%	55	67,9%	5	10,4%	7	15,5%	5	10,9%
Protection of public interest as regards the financial, monetary or economic policy of the Community or a Member State	0	0%	1	1,2%	2	4,2%	3	6,7%	0	0%
Protection of privacy and the integrity of the individual (protection of personal data)	0	0%	2	2,5%	4	8,3%	0	0%	2	4,4%
Protection of commercial interests of a natural or legal person, including intellectual property	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of court proceedings and legal advice	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of the purpose of inspections, investigations and audits	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of Institution's decision-making process	13	13,4%	2	2,5%	3	6,3%	19	42,2%	2	4,3%
Several reasons together or other reasons	51	52,6%	21	25,9%	30	62,5%	16	35,6%	34	73,9%

#### 14. Exceptions used to justify partial access (initial stage)

Exceptions foreseen in regulation 1049/2001	2021		2022		2023		2024		2025	
	#	%	#	%	#	%	#	%	#	%
Protection of public interest as regards public security	24	4,6%	70	7,3%	67	4,2%	41	3,5%	51	3,6%
Protection of public interest as regards defence and military matters	5	1%	6	0,6%	3	0,2%	1	0,1%	2	0,2%
Protection of public interest as regards international relations	65	12,5%	95	9,9%	214	13,4%	186	15,7%	132	9,4%
Protection of public interest as regards the financial, monetary or economic policy of the Community or a Member State	1	0,2%	1	0,1%	42	2,6%	28	2,4%	34	2,4%
Protection of privacy and the integrity of the individual (protection of personal data)	168	32,4%	400	41,9%	727	45,4%	407	34,5%	42	3%
Protection of commercial interests of a natural or legal person, including intellectual property	3	0,6%	4	0,4%	0	0%	5	0,4%	7	0,5%
Protection of court proceedings and legal advice	38	7,3%	16	1,7%	28	1,7%	3	0,2%	16	1,1%
Protection of the purpose of inspections, investigations and audits	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of the Institution's decision-making process	71	13,7%	161	16,9%	118	7,4%	43	3,6%	85	6%
Several reasons together or other reasons	144	27,7%	202	21,2%	400	25%	466	39,5%	1038	73,8%

## 15. Exceptions used to justify partial access (confirmatory stage)

Exceptions foreseen in regulation 1049/2001	2021		2022		2023		2024		2025	
	#	%	#	%	#	%	#	%	#	%
Protection of public interest as regards public security	1	1,8%	0	0%	1	2,3%	0	0%	0	0%
Protection of public interest as regards defence and military matters	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of public interest as regards international relations	4	7,4%	24	66,7 %	1	2,2%	6	13,3 %	3	10%
Protection of public interest as regards the financial, monetary or economic policy of the Community or a Member State	0	0%	0	0%	1	2,2%	20	44,4 %	0	0%
Protection of privacy and the integrity of the individual (protection of personal data)	5	9,3%	1	2,8%	37	82,2 %	3	6,7%	0	0%
Protection of commercial interests of a natural or legal person, including intellectual property	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of court proceedings and legal advice	4	7,4%	2	5,5%	1	2,2%	0	0%	0	0%
Protection of the purpose of inspections, investigations and audits	0	0%	0	0%	0	0%	0	0%	0	0%
Protection of Institution's decision-making process	7	13%	0	0%	0	0%	4	8,9%	1	3,3%
Several reasons together or other reasons	33	61,1%	9	25%	4	8,9%	12	26,7 %	26	86,7 %

**16. Number of documents (original language version) referred to in the public register by 31 December of each calendar year (and number of public documents)**

2021		2022		2023		2024		2025	
460 907	330 434 (71.7%)	482 786	346 951 (71.9%)	505 587	364 793 (72.1%)	527 057	380 637 (72.2%)	594 005	419 857 (70.7%)

**17. Average number of working days to reply to an initial request for access to documents and to a confirmatory application**

	2021	2022	2023	2024	2025
For the initial applications <sup>20</sup>	17 (2 083 requests)	16 (2762 requests)	16 (3732 requests)	17 (2872 requests)	17 (3881 requests)
For the confirmatory applications <sup>21</sup>	33 (44 conf. Applications)	36 (23 conf. applications)	33 (40 conf. applications)	31 (30 conf. applications)	30 (35 conf. applications)
Pondered average (initial + confirmatory)	17.34	16.17	16.17	17.14	17.12

**18. Number of applications with an extended deadline – Articles 7(3) and 8(2)**

	2021	2022	2023	2024	2025
Initial applications	623 of 2 083 29,9%	824 of 2 762 29,8%	1248 of 3 732 33,4%	975 of 2 872 33,9%	1440 of 3 881 37,1%
Confirmatory applications	43 [of 44]	23 [of 23]	40 [of 40]	29 [of 30] <sup>22</sup>	34 [of 35] <sup>23</sup>

<sup>20</sup> These figures comprise both initial applications submitted according to Article 7 of Regulation (EC) No 1049/2001 and the so-called "6(3) applications".

<sup>21</sup> Confirmatory applications are examined by the Council's Working Party on Information and by the Permanent Representatives Committee (Part 2). Replies to the applicants are adopted by the Council.

<sup>22</sup> Confirmatory application 27/c/01/24 was withdrawn.

<sup>23</sup> Confirmatory application 21/c/01/25 was withdrawn.