

## Meeting Transparency Register – Stakeholders

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Contributors: SEAP (membership = individual)

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**A. What is the overall balance sheet of the Transparency Register? Both in terms of meeting its own objectives (wide coverage, proportionate, informative, etc) and in terms of how it compares to other similar regulatory systems in the world.**

SEAP feels that the register is on its way to achieving its objective: this is an opportunity for evolution not revolution. SEAP welcomes these discussions, it already provided guidelines for its members and would like to contribute to clearer guidelines by the JTRS. There are some developments at Member State level, which it would be interesting to harmonise, in the interest of consistency.

**B. What would be your agenda for change? Why and how?**

SEAP does not support a mandatory register until there is more clarity on the legal basis for such a system. Stakeholders must be allowed to interact with the Commission and other institutions, perhaps a threshold would be sufficient protection. Officials should be provided with training and be recommended to ask whether an entity is registered before meeting them. The new legislature will be a perfect opportunity to emphasise such training.

SEAP supports an incentive-based registration and does not favour stringent mandatory guidelines. [Guidelines should be there to assist organisations who are registering in good faith and should be able to duly explain and justify any deviations from the guidelines. This is a more proportionate approach that limits the imposition of too much red tape on registrants, particularly smaller organisations.](#) Our members have also raised problems with the Belgian tax authorities making VAT calculations from financial data provided in the TR.

Transparency Register is not an anti-corruption tool.

**C. How does your own organisation intend to contribute itself to help us achieve our common goals? Promotion within your members, a requirement for your own members, etc.**

[SEAP strongly supports the common goal of a transparent dialogue between the EU institutions and stakeholders.](#) SEAP has long provided support to its members with regard to the TR, through guidelines, meetings etc. It has also provided in writing to the Commission other actions it is happy to take to help promote use of the TR.