



EUROPEAN PARLIAMENT

**Joint Transparency
Register Secretariat**



Transparency Register

Dialogue with stakeholders

**15 January 2013
& 05 February 2013**

The Transparency Register is operated by the European Parliament and the European Commission.

The "Joint Secretariat" is made up by officials from both institutions.

<http://europa.eu/transparency-register> - Helpdesk: SG-TRANSPARENCY-REGISTER-CONTACT@ec.europa.eu

List of registered umbrella organizations invited to participate in the dialogue with stakeholders contributing to the review exercise of the Transparency Register.

Organisation	Invited Representative	Position	Organisation website	Contribution to Public Consultation 2012	Persons present 15/01/13	Persons present 5/02/13
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SECTION 1: Professional consultancies/law firms/self-employed consultants

EPACA - European Public Affairs Consultancies' Association	Karl Isaksson	Chairman	http://www.epaca.org/	YES	KI/Robert Mack	KI/RM
SEAP - Society of European Affairs Professionals	Susanna Di Felicianantonio	President	www.seap.be	YES	Dani Kolb; SDF	Andreas Galanakis SDF
IPRA - International Public Relations Association	Philip Sheppard	Member of the board	www.ipra.org	YES	PS	PS
CCBE - Council of Bars and Law Societies of Europe	Jonathan Goldsmith	Secretary general	www.ccbe.org	YES	Lucy Dupong, Simone Cuomo	SC

SECTION 2: In-house lobbyists and professional associations

BUSINESS EUROPE	Philippe DE BUCK	Director general	www.business-europe.eu	YES (ad-hoc)	Christian Feustel	CF
UEAPME - European Association of Craft, small and medium-sized enterprises	Andrea Benassi	Secretary general	www.ueapme.com	YES	Luc Hendrickx	LH
CEEP - European Centre of Employers and Enterprises providing Public services	Ralf RESCH	Secretary general	www.ceep.eu	NO	Pazanne Dupont	PD
ETUC - European Trade Union Confederation	Bernadette SEGOL	Secretary general	www.etuc.org	NO	None	None

SECTION 3: NGOs

CSCG - Civil society contact group	Leonardo Palumbo	Coordinator	www.act4europe.org	YES (ad-hoc)	LP	LP
FAIB - Federation of European and International Associations established in Belgium	Danièle VRANKEN	Secretary general	www.faib.org	YES	André Douette	AD
Transparency International	Jana Mittermaier	Director of EU office	www.transparency.org	YES (ad-hoc)	JM, Ronny Patz	RP & Olivier Lewis
Alter EU	Erik Wesselius	Member of the steering committee	www.alter-eu.org	YES	Paul De Clerk & Olivier Hoedeman	PDC/ EW

SECTION 6: Organisations representing local, regional and municipal authorities, other public or mixed entities, etc.

AER - Assembly of European Regions	Mr Pascal Goergen	Secretary general	www.aer.eu	YES	Régine Kramer	RK
EUROCITIES	Paul BEVAN	Secretary general	www.eurocities.org	NO	None	None

Feedback provided by stakeholders on the 2013 TR review process - sheet 1 GENERAL POLICY ISSUES

	EPACA	SEAP	IPRA	CCBE	BE	UEAPME	CEEP	CSCG	FAIB	TI	ALTER EU	AER
1. Comments relative to the review process itself			The aim should be to remove those uncertainties that exist, not to add more.							Community of good faith is a good direction, together we should set a good example.	Need to bring in debate at national level, political discussion and citizen participation.	Need for further internal discussions to develop our position.
2. A voluntary or mandatory system?	Mandatory (in principle), although would have to see detail. Difficult to make a voluntary system mandatory (11% of our member orgs not registered). Need for a level playing field for all.	Voluntary, until legal basis is discussed (difficult to make mandatory for our members as individuals) 63% of our members are from registered orgs.	Voluntary, because mandatory can only exist on national level. The TR is a useful information tool for the policy-maker.		Voluntary, what would a mandatory register add?	Voluntary, but better information on public consultations than is currently the case.		Mandatory, should apply to all members of expert groups and participants to events in EU institutions.	Voluntary, but need to discriminate in favour of registered organisations. More advantages are needed for those in the register.	A mandatory system is more credible, and will close gap for non-registered organisations. More research is needed though, and de facto mandatory is the right direction. Art.11 of the Treaty is not always a valid argument against mandatory (transparency of knowledge of influence can also promote exchange).	Mandatory, more research needed on legal basis. De facto steps are good, for ex. Commissioners should meet only with registered lobbyists. A mandatory system could be applied to all spenders over 5,000EUR per annum, and applied to official meetings & events (not to phonecalls). Two-prong approach: long-term goal = mandatory (in line with EP wishes) short-term de facto mandatory.	Voluntary
3. The register should focus on individuals or organisations?	Organisations, because individuals change too frequently.	Organisations (the register already contains a list of accredited individuals to the EP)	Organisations	Organisations: independent lawyers should ask their clients to register & name their lawyer in the register instead of registering themselves.	Organisations	Organisations		Organisations & individuals	Organisations	Organisations & individuals = need to capture both	Organisations & individuals	

Feedback provided by stakeholders on the 2013 TR review process - sheet 2 SPECIFIC ISSUES

	EPACA	SEAP	IPRA	CCBE	BE	UEAPME	CEEP	CSCG	FAIB	TI	ALTER EU	AER
1. Category I - declaration of confidentiality similar to Canadian system	OK	OK	OK	Welcome							OK	
2. Category I: Treatment of Consultancy employees acting as association executives	OK if included in guidelines	OK if included in guidelines	OK if included in guidelines					OK	OK	OK - clickable link between various registrations technically possible in the TR?	OK	
3. Category VI: Eligibility to the register of sub-national public authorities												We represent regions and not cities. Some of our members register, we therefore like the voluntary model. To be discussed further.
4. Category II & III - confusion of status between trade associations and NGOs									We can work with our trade association members, to clarify their status in the TR, relative to category III & NGOs. Better guidelines could help.			
5. Fiscal issues (VAT)									Belgian authorities seem to be using declarations in the TR to calculate VAT levels for our members - this needs to be clarified in TR Guidelines			
6. Financial declarations - category II & III								OK for introducing estimated costs related to TR scope for category III	The 50,000EUR bottom limit for estimated costs is too high for many organisations that we represent	OK for introducing estimated costs related to TR scope for category III	OK for introducing estimated costs related to TR scope for category III	

Feedback provided by stakeholders on the 2013 TR review process - sheet 3 IMPLEMENTATION and ENFORCEMENT

	EPACA	SEAP	IPRA	CCBE	BE	UEAPME	CEEP	CSCG	FAIB	TI	ALTER EU	AER
1. Complaints procedure & sanctions		As concerns possible reference to a professional body in this procedure this may be difficult for those organisations who have no European level representative, cf accountants		No appeal possible to an independent body. This is a big problem for law firms (see recent EP resolution on administrative law & fundamental right to appeal)								
2. Clearer guidelines	Re-evaluate link btw EP accreditation and 1 full-time person active under TR scope. Definition of lobbying should be closer to OECD wording. Scope of lobbying in financial estimates wider than in code of conduct. Calculations easier for consultancies, it would help for our clients to have clearer rules.	Yes, we are happy to collaborate with work in this area.	Yes		Existant guidelines not enough, we need help with estimate of lobby costs	Yes, much needed		Need for clarity on trainees in terms of financial cost	It must be possible to change the evaluation 1 accreditation = 1 full-time person active under scope of TR. Need to mention the problem of Belgian VAT in the guidelines.		Yes	
3. Stronger enforcement of guidelines	Much needed + better application on part of institutions	Ok if guidelines are clearer & stronger ethics on part of institutions. If a company responds to a QC with own methodology for calculation of costs, this must be acceptable (willingness to co-operate).	No	OK if Bar is given a say in complaints system				OK	OK - 25,000EUR seems like a reasonable base figure for calculating personnel cost. Could we lower the starting point for estimates of financial costs from 50,000EUR?	Yes		OK, but voluntary system has huge implication on verification of financial figures (i.e. no control). Some sectors/ categories repetitive mistakes, and need for a comparability exercise. Tension btw flexibility for registrants and expectations of civil society. Ongoing problem with acronyms.
4. More information required on activities - legislative dossiers	Impossible unless tick boxes provided	Possible to add a drop down list of legislative files? Tick boxes?	Tick boxes?					Absolutely, MEP assistants would welcome this	Very difficult	Yes	Very important!	

Feedback provided by stakeholders on the 2013 TR review process - sheet 4 TECHNICAL QUESTIONS

	EPACA	SEAP	IPRA	CCBE	BE	UEAPME	CEEP	CSCG	FAIB	TI	ALTER EU	AER
1. Registration and EP access procedures	<p>Application and renewal process is quick and efficient although there are still queues.</p> <p>1. The 4-person limit (at any one time in the EP) could be reviewed. important then to "decredit" someone leaving the building.</p> <p>2. The renewal of accreditation is a cumbersome administrative effort. Why does one have to submit all the same documents again? Compromise possible?</p>	<p>appreciation of steps taken to facilitate application / renewal of accreditation with EPT. Waiting times at the 'transparency desk' still a major irritant for SEAP members, we particularly welcome intention to move towards a longer-term 'pass' accompanied by some form of 'check-in / check-out' system – in addition to other measures inclg increased staff resources and further streamlining of the online application / renewal process. We look forward to swift implementation. In the meantime, we encourage EP make available information on average waiting times / peak periods.</p>	<p>Efficiency of the process is the most important</p>					<p>Need to be able to accredit trainees</p>	<p>Questions the method of considering 1 EP accreditation as 1 full-time person active under the scope of the TR</p>			
2. General technical considerations	<p>Annual update dates for registration should not fall on a holiday or weekend. TR admin should not accept declarations with 0EUR, 0 persons or 0 activities.</p>									<p>OK - link btw registrations technically possible in register? And can one link the TR website to other similar tools?</p>		

Feedback provided by stakeholders on the 2013 TR review process - sheet 5 CONTRIBUTIONS, DEVELOPMENT & AWARENESS

	EPACA	SEAP	IPRA	CCBE	BE	UEAPME	CEEP	CSCG	FAIB	TI	ALTER EU	AER
<p>1. Contributions from stakeholders</p>	<p>Happy to help by speaking to clients etc if rules are made clearer</p>	<p>Will co-operate with JTRS to help clarify guidelines (technical or information meetings with members). Difficult to oblige our members to join TR, but happy to help raise awareness (training for new SEAP members, incl case study of TR). Co operation with other stakeholders to develop common initiatives.</p>							<p>Will encourage network of 275 asbl & foundations to register (awareness campaign) through guidelines and questionnaire.</p>			
<p>2. Contributions from EU institutions</p>	<p>Top representatives of the Commission should not be speaking at events by non-registered organisations.</p>	<p>Institutions need to make a stronger commitment to ethics</p>									<p>ALTER EU would like to see stronger link made btw Code of Conduct for lobbyists and the MEP Code of Conduct, and code of conduct for Commissioners.</p>	