

**SCHNURRER Gisela (CAB-SEFCOVIC)**

**From:** LINDER Christian (CAB-SEFCOVIC)  
**Sent:** vendredi 8 juin 2012 18:19  
**To:** SCHNURRER Gisela (CAB-SEFCOVIC)  
**Subject:** FW: follow up

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**From:** LINDER Christian (CAB-SEFCOVIC)  
**Sent:** Friday, June 08, 2012 6:18 PM  
**To:** 'paul@milieudefensie.nl'; Vicky Cann  
**Cc:** katrina@haieurope.org  
**Subject:** RE: follow up

Dear Vicky, dear Paul,

**on the Transparency Register:**

The joint EP-COM Secretariat of the Register will launch a public consultation in June which will last for 12 weeks. In parallel, they will contact some of the umbrella organisations representing the various interests to provide feedback and encourage their members to participate in the consultation. Alter-EU should be amongst these organisations.

All this is done in view of drafting the first annual report on how the register operated during the 1st year. (It is not be mixed up with the review of the register which shall take place in 2013 according to the agreement signed by EP and COM.)

The contributions will be analysed after the summer and the annual report should be finalised afterwards.

The intention is to say also something about the checks made by the secretariat which you mentioned in the meeting.

In the framework of the report and the review, we also think about meeting stakeholders.

With regard to the Council, I can confirm again that they send an observer to the secretariat and a first meeting has already taken place.

With regard to your complaint concerning the European Business Forum, Mr. Legris replied to you last week, I think.

**On professional activities of (former) staff:**

I have sent Vicky's comments to DG HR and we will look into them in our discussions on guidelines for "external activities" and their practical implementation.

This will of course have to take account of the amendments to the Staff Regulations which the EP proposed if they are adopted in the end.

**On expert groups:**

The Commission is conducting a review of expert groups in order to address the concerns of the EP.

The Commission will report to the Parliament on the outcome of the review, as well as on other relevant aspects linked to the conditions put by the Parliament for lifting the reserve.

Best regards,  
 Christian

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Christian Linder  
 Member of Cabinet Vice-President Šefčovič  
 Commissioner for Inter-Institutional Relations and Administration  
 European Commission  
 BERL 11/30  
 B - 1049 Brussels  
 Tel.: +32-2-2986917  
 Fax: \*32-2-2988088  
 Internet: [http://ec.europa.eu/commission\\_2010-2014/sefcovic/index\\_en.htm](http://ec.europa.eu/commission_2010-2014/sefcovic/index_en.htm)

-----Original Message-----

From: Paul de Clerck [mailto:paul@milieudefensie.nl]

Sent: Thursday, May 31, 2012 3:33 PM

To: LINDER Christian (CAB-SEFCOVIC); Vicky Cann; Paul

Cc: katrina@haieurope.org

Subject: Re: follow up

Dear Christian,

As I am travelling from end of next week, I was wondering if you could already come back to us on some specific questions that we discussed last week, including our request for a meeting with Commissioner Sefcovic.

best regards

Paul de Clerck

>

> Thank you very much for the useful meeting yesterday.

>

> My colleague Katrina will follow up with you about the revolving door  
> and some EU agencies before too long, and we will be interested to see  
> your follow-up responses on the lobby register and on expert groups as  
> discussed.

>

> On the revolving door, our concerns include (but are not limited to)  
> those around how the rules are implemented and to follow up the  
> discussion that we have had on this, I make the following short comments

> and proposals:

>

> - In my view, the form sent to staff (attached) when they leave the  
> Commission is not comprehensive enough on article 16 requirements. I  
> propose that it would be better to send out the full article 16, a good  
> explanation of what it means in practice, and the form itself for staff  
> to apply for permission for new activities.  
> - DG-HR's 'practical guide to staff ethics and conduct' could also be  
> greatly improved in the area of article 16. There is little explanation  
> of what the article means in practice and no case studies. Case studies  
> cannot cover all examples, but they can give an idea of high risk and  
> low risk jobs and could act in a very practical way to explain the rules

> better and increase the adherence to the rules

> - DG-HR has also sent me the training slides which are used when staff  
> leave the Commission; again, some more detailed explanations, use of  
> case studies etc could really help people to understand the rules - at  
> the moment the slides appear to consist of just a re-statement of what  
> the Staff Regulations say.

> - I continue to argue that the explanations around article 11a in  
> DG-HR's 'practical guide' are also not as explicit as they could be  
> about what private interests include. Of course it is important to  
> mention spouses and their interests, but is there really any harm in  
> also asking people to formally declare relevant former employers and  
> clients?

> - I understand that there is no specific training for staff who leave  
> and then come back from CCP - this seems an oversight considering the  
> very real risk of conflicts of interest which can arise from sabbatical  
> posts

> - I continue to find it surprising that apparently no revolving doors  
> cases have been referred to the IDOC that would warrant a severe  
> sanction, considering that we have provided the Commission with evidence

> of ex-staff who have ignored the rules for 2 years or more etc and other

> breaches. This could be construed as adding to the overall impression  
> that these implementing rules tightly is not a high priority for the  
> Commission. Using sanctions when the rules are not followed would  
> undoubtedly boost the rules' profile and presumably adherence to them.

>

> I hope these quick comments on the implementation of revolving door  
> rules are helpful and can feed into ongoing Commission processes.  
>  
> Thanks again for the meeting. We look forward to hearing from you.  
>  
> Best wishes,  
>  
> Vicky

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Paul de Clerck  
Coordinator Corporate Campaign FoE International and Economic Justice  
Program FoE Europe  
c/o Friends of the Earth Europe  
Rue D'Edimbourg 26, 1050 Brussels, Belgium  
Phone: 32-494380959  
Fax: 32-2-8931035  
Email: paul@milieudéfense.nl  
Skype: pauldeclerck1

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