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By email : [gerard.legris@ec.europa.eu](mailto:gerard.legris@ec.europa.eu)

Brussels, 20 February 2013

Dear Gérard,

### **SEAP support for the Transparency Register**

On behalf of SEAP, I would like to thank you and your colleagues for the two very productive technical meetings held recently with stakeholders on the current review of the transparency register.

As an active participant in the debate on the transparency initiative and register since the start, SEAP remains committed to supporting efforts by the European Commission and the European Parliament to enhance transparency around the dialogue that takes place between EU institutions and the public affairs profession. We hope that our formal input to consultations, as well as our regular feedback on guideline reviews, testify to this commitment.

During the recent technical meetings, the question of whether signing up to the transparency register should be a pre-requisite for SEAP membership was raised again. As we have discussed in the past, SEAP membership is on an individual not an entity basis. While the majority of our members do work for organisations that are included on the register, it would not be appropriate for SEAP to mandate registration as a condition of membership. Nonetheless, we have made determined efforts to try and facilitate the process for those members that may be responsible for their organisation's registration.

Looking ahead and as already suggested during the last technical meeting, SEAP would be happy to consider other initiatives in support of the register, for instance:

- Communicating results of the current review process, possible revisions to the guidelines and similar publications (for instance a 'common mistakes' document) to our members;
- Hosting a meeting of SEAP members with the JTRS on specific issues associated with the register, including financial disclosure matters, if there is interest to do so;
- Discussion with other stakeholder bodies on potential common initiatives related to the register for our respective members;
- Ensuring that training on the SEAP code of conduct, obligatory for all new members, includes a 'case study' related to the register.

We also welcomed the openness to involving professional bodies, including SEAP, in the complaints process as expressed during the second meeting. We are considering how this

might work in practice and hope to come back to you with further thoughts on this specific issue.

We would also like to re-iterate our appreciation of the steps taken to facilitate the application / renewal of accreditation with the European Parliament. With waiting times at the 'transparency desk' still a major irritant for SEAP members, we particularly welcome the intention to move towards a longer-term 'pass' accompanied by some form of 'check-in / check-out' system – in addition to other measures including increased staff resources and further streamlining of the online application / renewal process. We look forward to swift implementation of these measures. In the meantime, we encourage the Parliament to make available information on average waiting times / peak periods. This would be helpful for our members and may also assist Parliament in monitoring and improving performance.

We look forward to discussing some of these issues at the future meeting with Vice Presidents Wieland and Šefčovič and to continuing our on-going dialogue with you and your colleagues in the JTRS.

With kind regards,

A handwritten signature in black ink, appearing to be 'SDF', followed by a long horizontal line extending to the right.

Susanna Di Felicianantonio  
President

cc Joint Transparency Register Secretariat