

European Transparency - Political meeting of June 5th 2013 Commissioner Sefcovic

FAIB represented by André Douette

I am member of the Board of the Federation of European and International Associations based in Belgium which was honored to have an early presentation by Commissioner Kallas in 2007 of the purposes pursued by a Transparency Initiative and which, since then, has closely followed the progress made in this policy.

FAIB is an NGO. It profiles itself as the hub of 277 not-for profit associations with the scope of welcoming them in Belgium, providing them information to horizontal management issues and obtaining official legal recognition of the associative movement by Belgian, European and International authorities.

We are pleased to defend the Transparency Initiative that can improve participatory democracy. We are looking forward that the Council could join the Commission and the Parliament in the scheme as well. In our opinion, Member States should also adhere to the policy as it has been stated on various occasions by Belgian Ministers (e.g. 2010 UNO speech of Minister of Foreign Affairs).

We are very much in favor of a voluntary registration focusing on organizations only and based on a sufficiently detailed Code of Conduct. Not only the legal base for a compulsory character is missing but also the freedom to participate should be offered to anyone from a democratic point of view. However, we would appreciate an increased discrimination between those which registered and those which did not by ways of incentives. On our side, we are prepared to contribute to a better dissemination through our quarterly News and our website to make associations better aware of the benefits of an adhesion and to recall them the guidelines that would come out after the 2013 review process. According to our 2013 Survey, there is still progress possible regarding the number of adhesions.

I recall that inpa's have been preoccupied that financial data disclosed in the register could be misinterpreted by the Belgian Tax Administration to draw wrong conclusions about an inpa's VAT status. We are aware that some members have been badly impacted. Clarifications brought by the 2011 Belgian administrative note is not yet noticeable. We have been pleased to hear the opinion of the Transparency Secretariat stating that there is a broad gap between an actual status of lobbyist and the advocacy activity that conducts to a registration. Any effort made to avoid this confusion is very welcome.

And to conclude, some suggestions :

- accreditation to the Parliament should also serve as a pass for other EU administrations and services. This would avoid additional checks and visitor's badges.
- the application of the access badge to the Parliament classifies the person amongst the full time so to say "lobbyists". It is far from being the case. This should be taken into account.
- For us the 50.000 euro bottom limit for estimated cost is too high for smaller organizations.
- In our sector, improvements of the guidelines could mainly address the distinction between NGO's and Trade Associations / and the description of the activity. Small entities should say "keep everything simple , intelligible and cheap"