

BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Wednesday 23 January 2013 16:49
To: president@seap.be
Cc: [REDACTED]; LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT; TRANSPARENCY-REGISTER (EP)
Subject: Invitation - 2nd meeting - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (SEAP)

Dear Ms Felicianonio,

It was decided at the Transparency Register Annual Report 2012 and 2013 review - Technical Meeting for Stakeholders on 15 January 2013 to hold a second meeting to further discuss the points on the agenda.

We would like to invite you on **Tuesday 5 February from 14:15 to 16:30** in room A1E-3 of the European Parliament.

Please confirm your participation by Friday 25 January.

Furthermore, could you please send the questions you wish to raise on the EP accreditation system by Tuesday 29 January, this will allow our colleagues from the Parliament to prepare the useful information.

Best regards,

G rard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unit  "Transparence"



Commission europ enne
Secr tariat g n ral
SGB5 - Berlaymont 5/341
B-1049 Bruxelles/Belgique
+32 2 299 94 06
gerard.legris@ec.europa.eu

http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm

From: WICKHAM Catherine (SG) **On Behalf Of** LEGRIS Gerard (SG)
Sent: Friday, December 14, 2012 3:55 PM
To: 'president@seap.be'
Cc: [REDACTED]; LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT; TRANSPARENCY-REGISTER (EP)
Subject: Invitation - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (SEAP)

Ares(2012)1496820
Brussels, 14 December 2012

Dear Ms Felicianonio,

Please find enclosed an invitation to the Transparency Register Annual Report 2012 and 2013 review - Technical Meeting for Stakeholders on 15 January 2013.



Invitation
SEAP.pdf



List of registered transparency_re...
umbrella or...

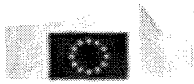


Best regards,

G rard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm

BOSSUROY Melanie (SG)

From: LEGRIS Gerard (SG)
Sent: Monday 4 February 2013 16:18
To: 'EPHA [REDACTED]'
Cc: THIEL Marie (EP); BOSSUROY Melanie (SG); SCHILTZ Priscilla (SG); RUFAS QUINTANA Jose Luis (EP)
Subject: RE: Invitation - 2nd meeting - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (Civil Society Contact Group)

No problem we will be happy to see you again tomosrow
Best regards

G rard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unit  "Transparence"


Commission europ enne

Secr tariat g n ral
SGB5 - Berlaymont 5/341
B-1049 Bruxelles/Belgique
+32 2 299 94 06
gerard.legris@ec.europa.eu

From: EPHA [REDACTED]
Sent: Monday, February 04, 2013 4:17 PM
To: LEGRIS Gerard (SG)
Subject: Re: Invitation - 2nd meeting - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (Civil Society Contact Group)

Dear Mr Legris,

My appologies for not responding earlier, last week I was out of the office for several days.

If it is not too late, I would like to attend.

As for specific questions, most of ours had been answered previosly.

I have a badge to access the parliament.

Kind regards,

[REDACTED]
[REDACTED]
European Public Health Alliance (EPHA)

Rue de Tr ves, 49-51, 1040 Brussels
[REDACTED]

This email arises from the European Public Health Alliance which has received funding from the European Union, in the framework of the Health Programme. Sole responsibility for this email lies

with EPHA and the Executive Agency is not responsible for any use that may be made of the information contained therein.

On 23 January 2013 16:48, <Gerard.Legris@ec.europa.eu> wrote:

Dear [REDACTED]

It was decided at the Transparency Register Annual Report 2012 and 2013 review - Technical Meeting for Stakeholders on 15 January 2013 to hold a second meeting to further discuss the points on the agenda.

We would like to invite you on **Tuesday 5 February from 14:15 to 16:30** in room A1E-3 of the European Parliament.

Please confirm your participation by Friday 25 January.

Furthermore, could you please send the questions you wish to raise on the EP accreditation system by Tuesday 29 January, this will allow our colleagues from the Parliament to prepare the useful information.

Best regards,

Gérard LEGRIS

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http://europa.eu/transparency-register/index_fr.htm

From: WICKHAM Catherine (SG) **On Behalf Of** LEGRIS Gerard (SG)

Sent: Friday, December 14, 2012 4:19 PM

To: [REDACTED]

Cc: LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT; TRANSPARENCY-REGISTER (EP)

Subject: Invitation - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (Civil Society Contact Group)

Ares(2012)1496820

Brussels, 14 December 2012

Dear [REDACTED]

Please find enclosed an invitation to the Transparency Register Annual Report 2012 and 2013 review - Technical Meeting for Stakeholders on 15 January 2013.

Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm



BOSSUROY Melanie (SG)

From: Kolb, Daniela <dkolb@kelleneurope.com>
Sent: Thursday 24 January 2013 9:32
To: LEGRIS Gerard (SG); susanna.difeliciantonio@icaew.com
Cc: 'president@seap.be'; ██████████; SG TRANSPARENCY REGISTER CONTACT; TRANSPARENCY-REGISTER (EP)
Subject: RE: Invitation - 2nd meeting - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (SEAP)

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr. Legris,

Many thanks for the invitation to the second meeting. Unfortunately I will be in the USA in February and won't be able to join. But SEAP will be represented at the meeting.

With best regards,

Dani Kolb

Dani Kolb
Manager

■ KELLEN
europe

Avenue Jules Bordet 142, 1140 Brussels, Belgium
Phone: + 32 2 761 16 00 Fax: + 32 2 761 16 99
E-mail: dkolb@kelleneurope.com
www.kelleneurope.com

Kellen Europe is the European base of the Kellen Company, which provides association management, government affairs, strategic advice, public relations, meetings management, creative communications, Web site development and other professional services to associations, as well as individual companies and other organizations.

Kellen has offices in Atlanta, Beijing, Brussels, Chicago, New York and Washington D.C. and Global alliance partners, among others in India, Japan, Singapore and the Middle East.

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From: Catherine.WICKHAM@ec.europa.eu [mailto:Catherine.WICKHAM@ec.europa.eu] **On Behalf Of** Gerard.Legris@ec.europa.eu
Sent: mercredi 23 janvier 2013 16:49
To: Kolb, Daniela; susanna.difeliciantonio@icaew.com
Cc: 'president@seap.be'; ██████████; Gerard.Legris@ec.europa.eu; SG-TRANSPARENCY-REGISTER-CONTACT@ec.europa.eu; DGPRES-TRANSPARENCY-REGISTER-CONTACT@europarl.europa.eu
Subject: Invitation - 2nd meeting - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (SEAP)

Dear Ms Feliciantonio,
Dear Ms Kolb,

It was decided at the Transparency Register Annual Report 2012 and 2013 review - Technical Meeting for Stakeholders on 15 January 2013 to hold a second meeting to further discuss the points on the agenda.

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Cc: [REDACTED] LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT; TRANSPARENCY-REGISTER (EP)

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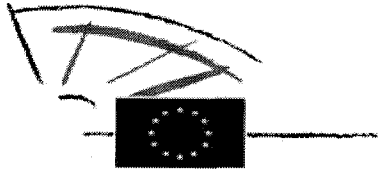
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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm



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 L	YES	KI/Robert Mack	KI/RM
SEAP - Society of European Affairs Professionals	Susanna Di Felciantonio	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.businesseurope.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	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	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	XXXXXXXXXX	Secretary general	www.eurocities.org	NO	None	None



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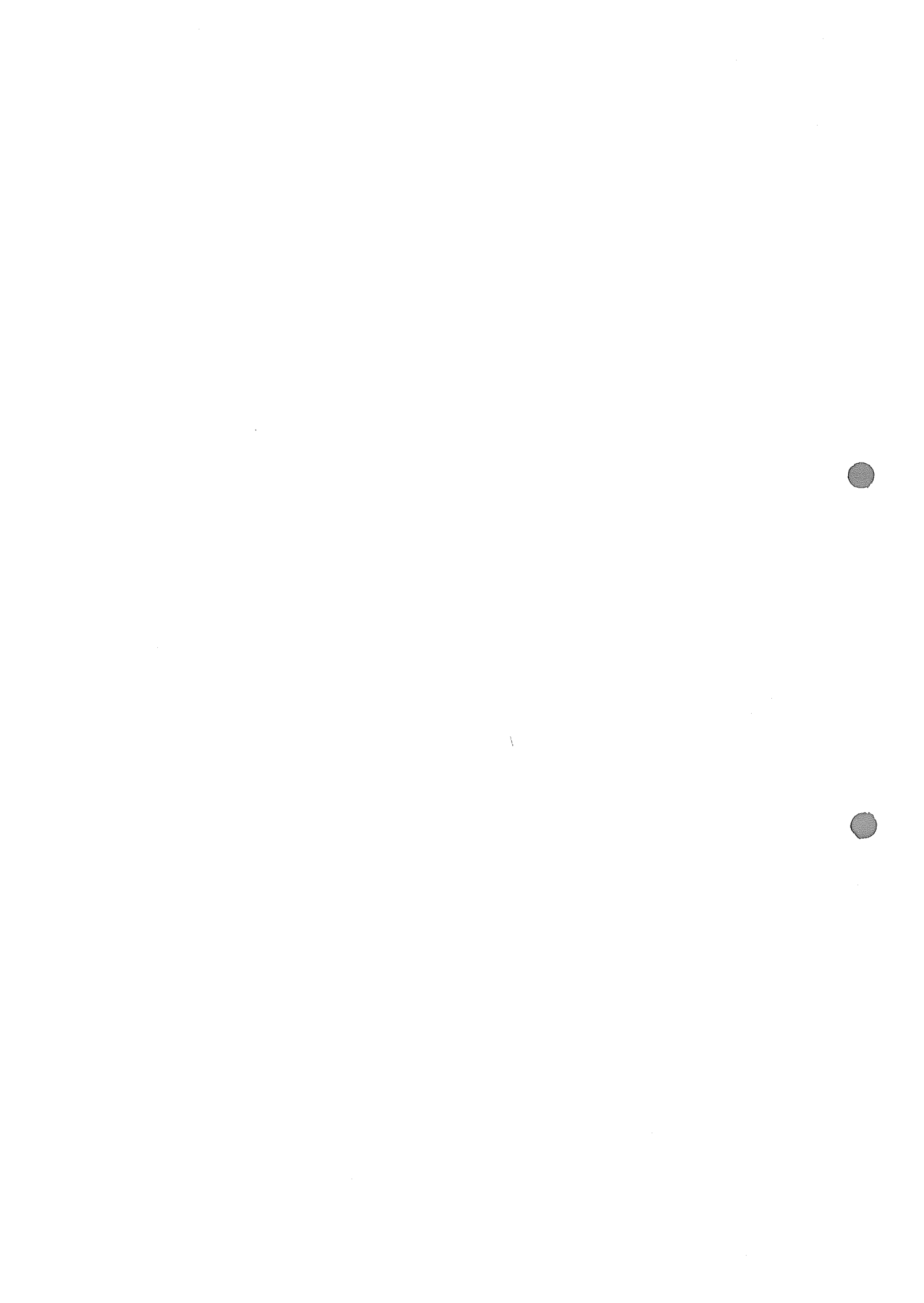
Feedback provided by stakeholders on the 2013 TR review process - sheet 1 GENERAL POLICY ISSUES

	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	



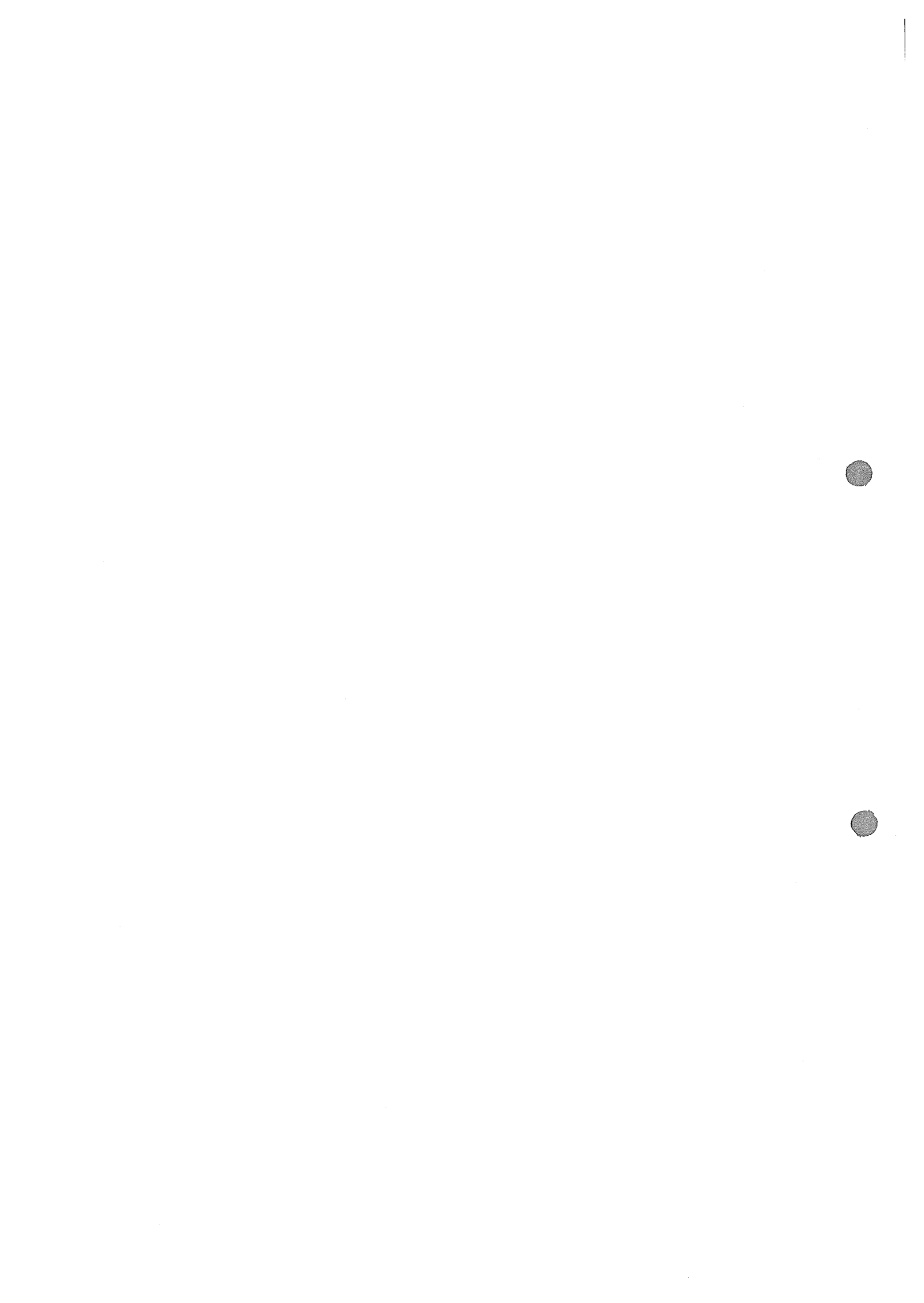
Feedback provided by stakeholders on the 2013 TR review process - sheet 2 SPECIFIC ISSUES

	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!	



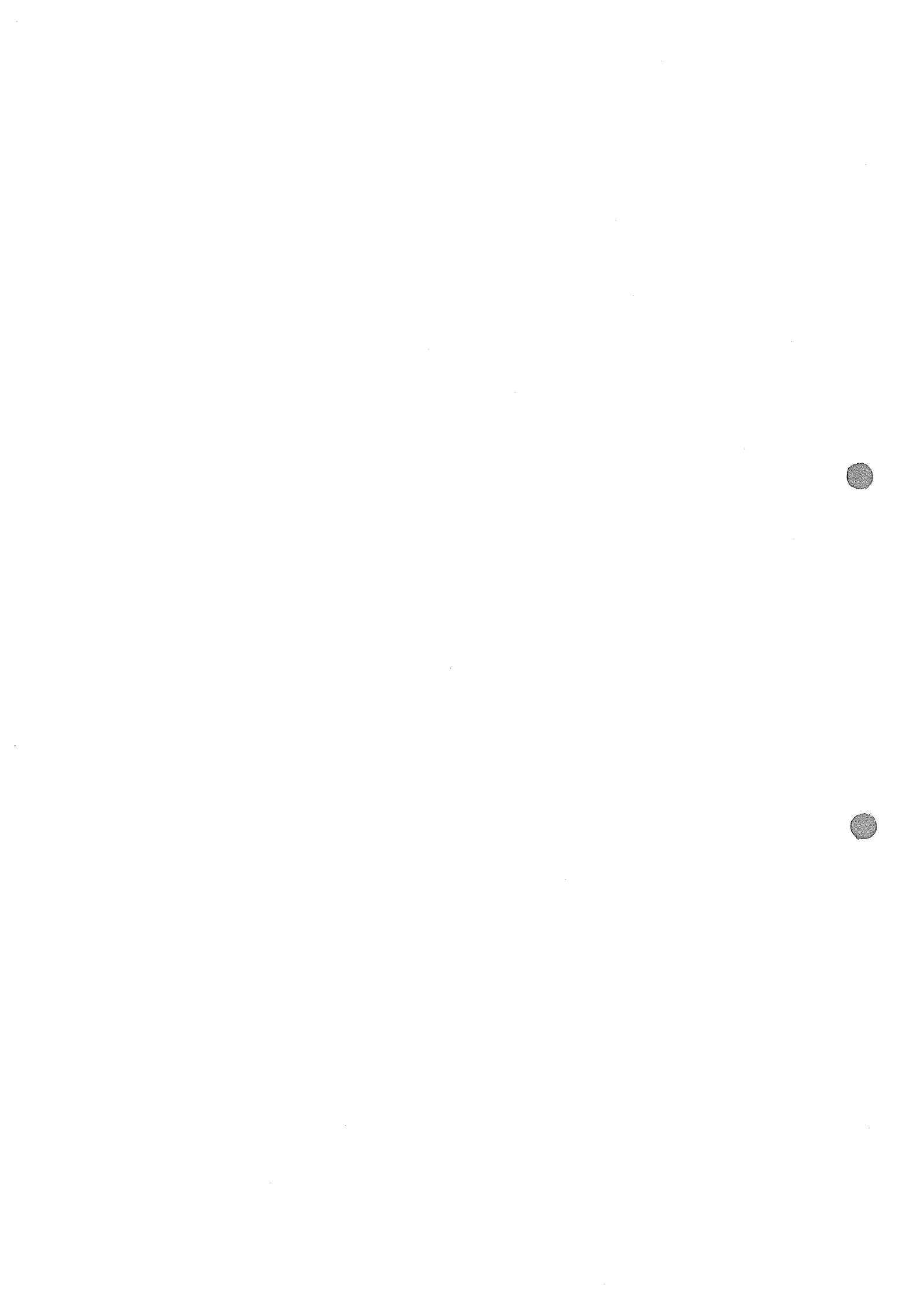
Feedback provided by stakeholders on the 2013 TR review process - sheet 4 TECHNICAL QUESTIONS

	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>	



BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Tuesday 30 April 2013 11:37
To: 'Feustel Christian'
Cc: LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT
Subject: RE: Transparency Register Political meeting - 15 May 2013 15:00-17:00
Attachments: Feedback from stakeholders.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Christian,

I wish to thank you for your message confirming your participation to the 15 May meeting with Vice-President Šefčovič in the context of our preparation for the review exercise of the Transparency Register system.

In view of this meeting I am sending you the record produced by the joint secretariat to summarize the views expressed during the exchanges we had earlier with you. These are of course very synthetic and are no substitute for the various position papers which you might have tabled earlier or after our meetings and which are fully part of our background files for the Vice-President. Should you wish to correct, adjust or complete our record of your views or even produce any specific separate complement before the meeting, please feel free to do so by sending this to me at your earlier convenience.

I am also appending to this message reference to two external documents for further reference on our work:

1 – The Transparency Register: A European vanguard of strong lobby regulation? By Justin Greenwood and Joanna Dreger from Robert Gordon University Aberdeen Business School, and the College of Europe.
<http://www.palgrave-journals.com/iga/journal/vaop/ncurrent/full/iga20133a.html>

2 – ‘Lobbying Law in the Spotlight: Challenges and Proposed Improvements’ Report of the Task Force on Federal Lobbying Laws
Section of Administrative Law and Regulatory Practice American Bar Association
http://www.americanbar.org/content/dam/aba/migrated/2011_build/administrative_law/lobbying_task_force_report_010311.authcheckdam.pdf

● look forward to meeting you again on Wednesday 15 May 2013.

Best regards,

Gérard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



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Secrétariat général
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http://europa.eu/transparency-register/index_fr.htm



From: Feustel Christian [mailto:c.feustel@businessseurope.eu]
Sent: Monday, April 29, 2013 4:39 PM
To: WICKHAM Catherine (SG)
Subject: FW: Transparency Register Political meeting - 15 May 2013 15:00-17:00

Dear Mrs Wickham

Director General Markus Beyrer will unfortunately not be able to attend this meeting. Is it OK if I replace him?

Best

Christian Feustel
Senior EP Adviser

BUSINESSEUROPE
Tel: +32 (2) 237 6519
c.feustel@businessseurope.eu
www.businessseurope.eu

EU Transparency register: 3978240953-79

From: Markus Beyrer
Sent: lundi 29 avril 2013 12:08
To: Feustel Christian
Subject: FW: Transparency Register Political meeting - 15 May 2013 15:00-17:00

From: Catherine.WICKHAM@ec.europa.eu [mailto:Catherine.WICKHAM@ec.europa.eu] **On Behalf Of** Gerard.Legris@ec.europa.eu
Sent: lundi 29 avril 2013 11:43
Cc: SG-TRANSPARENCY-REGISTER-CONTACT@ec.europa.eu; Gerard.Legris@ec.europa.eu
Subject: Transparency Register Political meeting - 15 May 2013 15:00-17:00

Dear Sir,
Dear Madam,

Following the two meetings at technical level which took place earlier this year, I wish to inform you that the meeting at political level with Vice-President Šefčovič will take place on **15 May 2013 from 15:00 to 17:00** in the Berlaymont building – Room S3 (Rue de la Loi 200; 1040 Bruxelles).

Could you please inform me of the name of the two representatives from your organisation who will attend the meeting on 15 May 2013 before Friday 3 May COB.

Best regards,

Gérard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



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BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Tuesday 30 April 2013 11:38
To: 'Pazanne Dupont'
Cc: LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT
Subject: RE: Transparency Register Political meeting - 15 May 2013 15:00-17:00
Attachments: Feedback from stakeholders.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ms Dupont,

I wish to thank you for your message confirming your participation to the 15 May meeting with Vice-President Šefčovič in the context of our preparation for the review exercise of the Transparency Register system.

In view of this meeting I am sending you the record produced by the joint secretariat to summarize the views expressed during the exchanges we had earlier with you. These are of course very synthetic and are no substitute for the various position papers which you might have tabled earlier or after our meetings and which are fully part of our background files for the Vice-President. Should you wish to correct, adjust or complete our record of your views or even produce any specific separate complement before the meeting, please feel free to do so by sending this to me at your earlier convenience.

I am also appending to this message reference to two external documents for further reference on our work:

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Section of Administrative Law and Regulatory Practice American Bar Association
http://www.americanbar.org/content/dam/aba/migrated/2011_build/administrative_law/lobbying_task_force_report_010311.authcheckdam.pdf

I look forward to meeting you again on Wednesday 15 May 2013.

Best regards,

Gérard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



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+32 2 299 94 06
gerard.legris@ec.europa.eu

http://ec.europa.eu/dgs/secretariat_general/index_fr.htm
http://europa.eu/transparency-register/index_fr.htm



From: Pazanne Dupont [mailto:Pazanne.Dupont@ceep.eu]
Sent: Monday, April 29, 2013 4:59 PM
To: WICKHAM Catherine (SG)
Cc: SG TRANSPARENCY REGISTER CONTACT; LEGRIS Gerard (SG); Valeria Ronzitti
Subject: RE: Transparency Register Political meeting - 15 May 2013 15:00-17:00

Dear Mrs Wickham ,

I will represent CEEP in this meeting.

Best regards,

PAZANNE DUPONT

Policy Officer

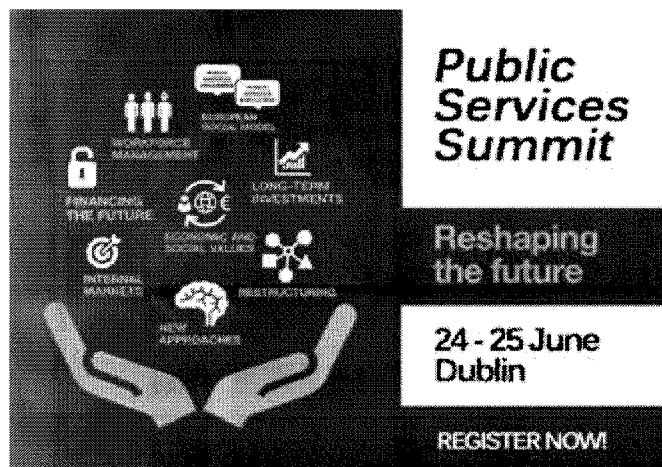
pazanne.dupont@ceep.eu / Dir Tel: + 32 (0) 2 229 2143

CEEP GENERAL SECRETARIAT

➤ Rue des Deux Eglises, 26 / BE – 1000 Brussels

➤ Tel: + 32 (0) 2 219 27 98 / Fax: + 32 (0) 2 218 12 13

➤ Email: ceep@ceep.eu / Website: www.ceep.eu



From: Catherine.WICKHAM@ec.europa.eu [mailto:Catherine.WICKHAM@ec.europa.eu] **On Behalf Of** Gerard.Legris@ec.europa.eu

Sent: lundi 29 avril 2013 11:43

Cc: SG-TRANSPARENCY-REGISTER-CONTACT@ec.europa.eu; Gerard.Legris@ec.europa.eu

Subject: Transparency Register Political meeting - 15 May 2013 15:00-17:00

Dear Sir,
Dear Madam,

Following the two meetings at technical level which took place earlier this year, I wish to inform you that the meeting at political level with Vice-President Šefčovič will take place on **15 May 2013 from 15:00 to 17:00** in the Berlaymont building – Room S3 (Rue de la Loi 200; 1040 Bruxelles).

Could you please inform me of the name of the two representatives from your organisation who will attend the meeting on 15 May 2013 before Friday 3 May COB.

Best regards,



Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



Commission européenne

Secrétariat général

SGB5 - Berlaymont 5/341

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gerard.legris@ec.europa.eu

http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm



BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Friday 3 May 2013 12:26
To: 'EPHA [REDACTED]'
Cc: LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT
Subject: RE: Transparency Register Political meeting - 15 May 2013 15:00-17:00
Attachments: Feedback from stakeholders.pdf

Dear [REDACTED]

I wish to thank you for your message confirming your participation to the 15 May meeting with Vice-President Šefčovič in the context of our preparation for the review exercise of the Transparency Register system.

In view of this meeting I am sending you the record produced by the joint secretariat to summarize the views expressed during the exchanges we had earlier with you. These are of course very synthetic and are no substitute for the various position papers which you might have tabled earlier or after our meetings and which are fully part of our background files for the Vice-President. Should you wish to correct, adjust or complete our record of your views or even produce any specific separate complement before the meeting, please feel free to do so by sending this to me at your earlier convenience.

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Section of Administrative Law and Regulatory Practice American Bar Association

http://www.americanbar.org/content/dam/aba/migrated/2011_build/administrative_law/lobbying_task_force_report_010311.authcheckdam.pdf

I look forward to meeting you again on Wednesday 15 May 2013.

Best regards,

Gerard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



Commission européenne

Secrétariat général

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gerard.legris@ec.europa.eu

http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm



From: EPHA [REDACTED]
Sent: Monday, April 29, 2013 12:15 PM
To: LEGRIS Gerard (SG)
Subject: Re: Transparency Register Political meeting - 15 May 2013 15:00-17:00

Dear Mr Legirs,

Many thanks for your invitation.

I wanted to write back that I will respond as quickly as possible and I fully intend to participate. I am supposed to be at a meeting in the Berlaymont perhaps from 15:00-15:30/16:00 for the CSCG on the MFF, but I will see if someone can replace me.

To clarify, I remember we briefly discuss civil society commitments, will this be one of the topics that day? I did want to let you know that the EPHA Director is a member of the high level group on administrative burden and she informed me that the representative from Transport and Environment alliance had asked all the experts to register their organisations in the Transparency register.

Kind regards;

[REDACTED]
[REDACTED]
European Public Health Alliance (EPHA)

Rue de Trèves, 49-51, 1040 Brussels
[REDACTED]

This email arises from the European Public Health Alliance which has received funding from the European Union, in the framework of the Health Programme. Sole responsibility for this email lies with EPHA and the Executive Agency is not responsible for any use that may be made of the information contained therein.

On 29 April 2013 11:43, <Gerard.Legris@ec.europa.eu> wrote:

Dear Sir,
Dear Madam,

Following the two meetings at technical level which took place earlier this year, I wish to inform you that the meeting at political level with Vice-President Šefčovič will take place on **15 May 2013 from 15:00 to 17:00** in the Berlaymont building – Room S3 (Rue de la Loi 200; 1040 Bruxelles).

Could you please inform me of the name of the two representatives from your organisation who will attend the meeting on 15 May 2013 before Friday 3 May COB.

Best regards,

Gérard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



Commission européenne
Secrétariat général
SGB5 - Berlaymont 5/341

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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm
http://europa.eu/transparency-register/index_fr.htm



BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG)
Sent: Tuesday 30 April 2013 11:35
To: [REDACTED]
Cc: LEGRIS Gerard (SG); SG TRANSPARENCY REGISTER CONTACT
Subject: RE: Transparency Register Political meeting - 15 May 2013 15:00-17:00
Attachments: Feedback from stakeholders.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Philip Sheppard,

I wish to thank you for your message confirming your participation to the 15 May meeting with Vice-President Šefčovič in the context of our preparation for the review exercise of the Transparency Register system.

In view of this meeting I am sending you the record produced by the joint secretariat to summarize the views expressed during the exchanges we had earlier with you. These are of course very synthetic and are no substitute for the various position papers which you might have tabled earlier or after our meetings and which are fully part of our background files for the Vice-President. Should you wish to correct, adjust or complete our record of your views or even produce any specific separate complement before the meeting, please feel free to do so by sending this to me at your earlier convenience.

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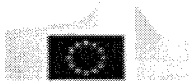
I look forward to meeting you again on Wednesday 15 May 2013.

Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm

11



From: [REDACTED]
Sent: Monday, April 29, 2013 11:55 AM
To: LEGRIS Gerard (SG)
Cc: SG TRANSPARENCY REGISTER CONTACT
Subject: RE: Transparency Register Political meeting - 15 May 2013 15:00-17:00

I will be delighted to attend for IPRA.

Philip Sheppard
Board member International Public Relations Association
www.ipra.org



BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Friday 3 May 2013 11:18
To: 'Ronny Patz'; Jana Mittermaier
Cc: SG TRANSPARENCY REGISTER CONTACT; LEGRIS Gerard (SG)
Subject: Required information for access to building: Transparency Register Political meeting - 15 May 2013 15:00-17:00
Attachments: Feedback from stakeholders.pdf

Dear Mr Patz,
Dear Ms Mittermaier,

I wish to thank you for your message confirming your participation to the 15 May meeting with Vice-President Šefčovič in the context of our preparation for the review exercise of the Transparency Register system.

In view of this meeting I am sending you the record produced by the joint secretariat to summarize the views expressed during the exchanges we had earlier with you. These are of course very synthetic and are no substitute for the various position papers which you might have tabled earlier or after our meetings and which are fully part of our background files for the Vice-President. Should you wish to correct, adjust or complete our record of your views or even produce any specific separate complement before the meeting, please feel free to do so by sending this to me at your earlier convenience.

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I look forward to meeting you again on Wednesday 15 May 2013.

Best regards,

Gérard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



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http://europa.eu/transparency-register/index_fr.htm



From: Ronny Patz [mailto:rpatz@transparency.org]
Sent: Thursday, May 02, 2013 4:20 PM
To: LEGRIS Gerard (SG)
Cc: Jana Mittermaier; SG TRANSPARENCY REGISTER CONTACT; WICKHAM Catherine (SG)
Subject: RE: Transparency Register Political meeting - 15 May 2013 15:00-17:00

Dear Mr Legris,

Thank you for your invitation to the stakeholder consultations at political level on the EU Transparency Register.

For the Transparency International EU Office, the participants will be:

- Jana Mittermaier, Director
- Ronny Patz, EU Communications & Policy Officer

Kind regards,

Ronny Patz

Ronny Patz
EU Communications & Policy Officer

Transparency International
Liaison Office to the EU
Rue Breydel 40, B-1040 Brussels, Belgium
EU Transparency Register N° 501222919-71

T. + 32 (0) 2 23 58 640
E. rpatz@transparency.org
Twitter: @ti_eu

From: Catherine.WICKHAM@ec.europa.eu [mailto:Catherine.WICKHAM@ec.europa.eu] **On Behalf Of** Gerard.Legris@ec.europa.eu
Sent: 29 April 2013 11:43
Cc: SG-TRANSPARENCY-REGISTER-CONTACT@ec.europa.eu; Gerard.Legris@ec.europa.eu
Subject: Transparency Register Political meeting - 15 May 2013 15:00-17:00

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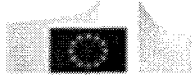
Could you please inform me of the name of the two representatives from your organisation who will attend the meeting on 15 May 2013 before Friday 3 May COB.

Best regards,

Gérard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.



Chef d'unité "Transparence"



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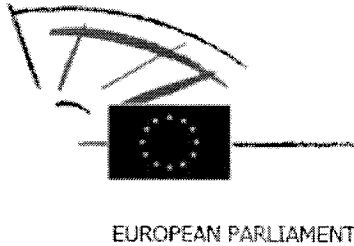
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Joint Transparency Register Secretariat



As a follow up to the 2012 Annual Report on the Operations of the Transparency Register (TR), and in the framework of the current review exercise foreseen by the Inter Institutional Agreement on the TR, representatives of European horizontal organisations corresponding to Categories I, II, III et VI of the TR were invited to a stakeholders' meeting on Wednesday 5 June 2013 at the European Commission to exchange their views with Vice President Commissioner Maroš Šefčovič, at the initiative of the Joint TR Secretariat.

The views expressed by the organisations invited are presented in the following pages, and have been validated by these same organisations.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: AER

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 compare to other similar regulatory system in the world.

AER has always supported the transparency initiative, but also ensured from the beginning that regions are not lobbyists, but representatives of public authorities, elected by the citizens which are part of the European decision making process and therefore did not see themselves concerned too much of a register of businesses and private interests.

Because of these reasons, it is in particular regions with legislative powers (such as in Austria or Italy or Germany) which do not intend to register.

Regions with legislating powers will not register (Austria/ Italy) etc. There has been some evolution concerning other regions after exchanges with JTRS, for example a rise in awareness of the tool, and numbers registering their Brussels offices have risen. (How many in total?) AER does not speak for cities.

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

AER would like to see a clearer distinction made between public and private interests in the register. The current division is not visible enough.

AER would like to suggest that the word "citizens" be included in the title of the Transparency Register, in order that the citizens feel more involved/ targeted and that the regions can better identify with the tool, i.e.: "Transparency Register for Citizens"

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.

AER has tried to raise awareness and interest of its members in the Transparency Register.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: ALTER EU

Represented by: Mr De Clerck and Mr Hoedeman

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 compare to other similar regulatory system in the world.

There have been some improvements to the register over past year, but remain insufficient in order for TR to meet its objectives.

(1) Numbers of registered entities have risen, but the Transparency Register is not yet "de-facto" mandatory. As the study by Greenwood and Dregerb points out, between 25-30% of actors in Brussels are missing from key categories such as companies (even more in other), for example we count 110 large companies who have not yet registered; hardly any of the major law firms that lobby are registered (some that were registered even chose for deregistration due to wish to maintain client confidentiality), and these problems are largely due to the voluntary approach. Some new registrations due to public pressure ex. Monsanto, Deutsche Bank. A transition to a mandatory register is the only sustainable solution to secure sufficiently high levels of registration for each of the key categories of lobbying entities.

(2) The quality of data has improved, especially due to new monitoring procedures, but there are still big problems. The information is limited and unreliable. This means the register does not meet the objective of providing citizens with a comprehensive and reliable picture of who is lobbying, on whose behalf, on which issues and with which budgets.

(3) In an international framework, the EU has the advantage of maintaining a broader definition of lobbying than the USA, which is very positive. However there is far lower

coverage than in the USA of key categories such as companies, consultancies and law firms (around 25% of consultancies are not registered in the EU, and very few law firms). The US model is not perfect, but coverage of the main lobbying actors is extremely high (in Washington DC US watchdog groups virtually never come across unregistered companies that lobby, while this is a very widespread problem in Brussels). The quality of data is better in the USA and despite the recent phenomenon of deregistration (by a small part of lobbyists) following new ethics policies introduced by Obama (such as revolving door restrictions and exclusion of registered lobbyists from advisory groups), as described by the American Bar Association, the Bar still favours a mandatory approach and tighter disclosure obligations for lobbyists. The study by the American Bar Association, clearly, cannot be used as an argument for a voluntary lobby register.

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

- **A compulsory vs a voluntary register.**

ALTER EU supports a mandatory register & suggests a two-track approach:

(1) Short term: incentives should be found for lobby groups to register, e.g. Commissioners & public officials should only participate in events organised by registered entities, the Commission should only meet with registered entities;

(2) Long term: a mandatory lobby register. ALTER EU has requested a legal opinion from **Markus Krajewski**, Professor of Public and International Law at the University of Erlangen-Nuremberg on the legal basis and procedure for a mandatory system. The event where the study will be presented will take place in EP on 17 June at 18h30. MEPs Monica Macovei and Evelyn Regner will speak at this event. ALTER-EU reminds fo the fact that the EP in its resolution of 2011 repeated “its call for the mandatory registration of all lobbyists on the Transparency Register” and called “for the necessary steps to be taken in the framework of the forthcoming review process in order to prepare for a transition to mandatory registration”. [European Parliament decision of 11 May 2011 on conclusion of an interinstitutional agreement between the European

Parliament and the Commission on a common Transparency Register (2010/2291(ACI)].

- **Bandwidths and thresholds for financial declarations should be lowered:** bandwidths should be 10,000EUR and a bottom threshold (of for instance 5,000EUR per quarter) should be introduced for registration (in order to exempt citizens and small groups that are not involved in lobbying on a major scale). Further proposals for more detailed disclosure requirements are included in ALTER-EU's new report "*Rescue the Register! How to make EU lobby transparency credible and reliable*".

- **The level of detail and scope of the Code of conduct.**

The code of conduct should be adapted and updated (also in the light of the new EP Members Code of Conduct). ALTER EU puts forward three main points:

- (1) There should be a cooling off period for civil servants who move to the private sector to lobby;
- (2) Lobby groups should not employ MEPs or MEP assistants;
- (3) There should be more clarity regarding the definition of inappropriate behaviour.
 - A more ambitious approach is needed in the complaint procedures (in many cases convincing complaints about under-reporting did not lead to clear conclusions)
 - There should be a distinction in treatment of non-registered entities

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.

- continue to monitor the register closely, to close the loopholes, for instance the new study "*Rescue the Register! How to make EU lobby transparency credible and reliable*"

- continue to make complaints relative to non compliant organisations
- upgrade and promoting the use of ALTER-EU and CSCG guidelines developed for NGOs' registrations (relative to topics and spending);
- Commissioned a study on the legal basis for a mandatory register, the results of which will be rendered public on Monday 17 June 2013 at 18:00.

Annexes:

http://www.alter-eu.org/sites/default/files/documents/Rescue_the_Register_report_25June2013.pdf

<http://www.alter-eu.org/sites/default/files/documents/1806%20legal%20framework%20for%20mandatory%20EU%20lobby%20register.pdf>

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: BUSINESSEUROPE

Represented by: Mr Dittmann Bernd

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.

So far, the Transparency Register has been a success. BE also agrees that civil society should be emphasised. Business Europe, which represents the corporate sector and trade associations has had specific problems with financial reporting requirements. Initial scepticism from the business sector has improved a lot. The uncertainties related to financial reporting have improved, thanks to guidelines issued etc, but we will need even more clarity if the requirement to register becomes stricter or obligatory.

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

- **A compulsory vs. a voluntary register.**

- As long as the register is voluntary, Business Europe can live with current financial reporting requirements. If the register becomes mandatory, we will need more precise rules.

- The USA is very different from the EU in terms of volume and culture (link to campaign funding) of lobbying, so it is difficult to compare the two systems (in terms of a mandatory registration).

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.

We will try to increase adherence from our members.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: CCBE (representing over 1 million lawyers in Europe)

Represented by: Mr Simone Cuomo, Jean-Louis Joris

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.

- The remaining obstacles to the registration of lawyers.

(1) Two specific aspects of the legal profession must be taken into account:

- it has its own regulation and code of conduct with discipline and sanctions, much wider than TR;

- lawyers represent clients with disputes under EU law (such as antitrust cases) before the ECJ and with EU institutions as adversaries.

(2) While lawyers have no problem with the transparency objective in itself, they are bound by stringent deontological rules and professional secrecy obligations which in some countries include the prohibition to reveal the client's name and financial information relating to them, as required under the TR. Although some bars (such as the Belgian bars) have found ways to address this issue, this problem remains a general issue of concern for lawyers, which explains their overall reluctance to register, especially of those who would as a result of that be in conflict with their national code of conduct. Within that context the CCBE supports the voluntary basis of the TR.

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

(1) As a matter of principle lawyers have an issue with para 17 of the IIA regarding disciplinary sanctions. The EU institutions, through the Joint Secretariat, are both judge and party to the complaint procedure, which may at least create an appearance of lack of impartiality, and no possibility is given for an appeal to an independent body. The need to avoid the appearance of partiality and the right to an appeal are two recognised fundamental aspects of due process, which apply to disciplinary proceedings as well. Those concerns are of course relevant for all those who would be registered, even though lawyers may be more sensitive to them than others, in particular those who represent clients against the Commission. Lawyers therefore consider that a mechanism should be found which addresses those concerns and which would be practical, efficient and within the framework of the EU institutions. For instance the party making the decision could be a judge of the Court of First Instance instead of the Joint Secretariat.

The fact that legal recourse is available before the courts against an administration that exceeds or abuses its powers and that they might be available in the case of a decision by the Joint Secretariat does not adequately address those concerns. First, the recourse that might be available against such decisions under those rules would involve litigation of a kind that is disproportionate to the issue at stake. Second, it would only be available in cases where the joint secretariat were actually biased in rendering a decision. This is not the concern. The concern is that taking such a decision, the Joint Secretariat might under the circumstances create the appearance of partiality, which is not a ground for annulment of an administrative decision under those rules. Similarly, the suggestion made that the professional body representing the organisation (e.g. the Bar authorities) would be given the possibility to "intervene" does not address the concern that the body making the decision could be perceived as being both the judge and one of the parties. Finally, the possibility to lodge a complaint before the ombudsman cannot be a substitute for the right to appeal before an independent disciplinary authority.

(2) The CCBE would wish clarification of para 8 of the IIA, namely regarding the scope and activities which fall within the scope of the TR. The meaning of the expression "indirectly influencing" needs to be clarified, and it should be made clear that the preparing of information material, discussion papers or position papers in preparation for lobbying activities that do not materialise and therefore do not result in actual contacts with European officials, should never give rise to registration.

(3) Should the register become *de facto* or *de jure* mandatory, CCBE is concerned that the understanding reached on what is to be declared might later be unilaterally changed.

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.

CCBE is willing to enter into discussions with the institutions in the framework of the review, in order to find a workable compromise, so that lawyers can sign up to the TR.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: CEEP

Represented by: Ms Pazanne Dupont

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.

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

In view of the very diverse membership of CEEP (varying from local/ regional authorities to private sector) CEEP would recommend the following:

Simplicity and clarity in terms of what is expected of registrants

There is a need for more practical detail (guidelines etc) to help registrants

Difficult for transversal organisations to define activities (files) they are working on

Difficult for small organisations to update their information in the register bi-annually - so once a year is sufficient.

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.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: CSCG (NGOs)

Represented by: Mr Leonardo Palumbo

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.

CSCG considers that there has been considerable improvement compared to the time when there were two separate registers and welcomes efforts from both the Commission and the Parliament to bring the Council on board, which had not happened in the past. It is positive to have an increase in the number of registrations but CSCG would like to see more quality. Members are concerned that comparison with national level or international initiatives should not be an argument to introduce more ambitious rules at the EU level.

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

- **The bandwidths and the thresholds for financial declarations.**

This should be lowered to 10 000 EUR in order to get a more accurate picture of lobbying activities. CSCG agrees with ALTER EU's propositions and in particular, they feel that a future review process should be foreseen for the Transparency Register, again in consultation with its stakeholders, and to ensure that a mandatory lobby register is introduced.

CSCG feels that there should be an obligation for organisations hosting events in the EP and members of expert groups to be registered in the TR. It also recommends the inclusion of activities provided for in the treaties under the scope of the TR, for example trade unions foreseen under Social Dialogue.

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.

CSCG co-operated with ALTER EU to draw up stricter guidelines for NGOs. To actively take part in the review process, which members thank Commissioner Sefcovic and the Joint Register for organising.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: EPACA

Represented by: Mr Karl Isaksson and Mr Robert Mack

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.

EPACA is positively surprised about the Transparency Register's success so far. Whilst the Transparency Register has not particularly changed the general behaviour of lobbyists, it has increased the transparency of their activities in general.

EPACA recognises that developments are taking place on the national level and would welcome more harmonisation throughout Europe and an inclusion of the Council in the TR.

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

EPACA supports a mandatory system: both to provide a level playing field for interest representatives and to make sure that information provided is more consistent and can provide for broad comparisons between data. EPACA agrees with BUSINESS EUROPE that any strengthening of rules will require more precise guidelines on the part of the institutions. EPACA feels very strongly that until such a mandatory system is in place, incentives to registration should be strengthened, and in particular that EU officials should not participate to or attend events organised by non-registered entities. Alert emails received by the Commission on consultations are not considered an incentive. The EU needs to show its support for ethical & transparent lobbying by making commitments. Mechanisms for enforcement and follow up also need to be improved. EPACA would welcome increased participation of lawyers & law firms.

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.

EPACA promotes registration within its membership (39 of 42 are registered); and also promotes registration to its clients.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: FAIB (277 associations)

Represented by: Mr André Douette

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.

FAIB supports the TR and hopes the Council joins in. Member States should also adhere to similar policies. FAIB has concerns relative to financial data provided in the TR being wrongly used as a reference by Belgian tax authorities, in particular the calculation of VAT status or "exemptions" with regard to "lobbying" activities. Some of its members have been badly affected.

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

FAIB support a voluntary register, with a more detailed guidelines for two main reasons: the lack of a legal basis; and in the interest of democracy (everyone should have equal access to the institutions). However, FAIB favour the introduction of more incentives for those who register.

- **The bandwidths and thresholds for financial declarations.**

They feel that the 50 000 EUR per annum is too high for the lowest budget. Guidelines need to be improved and in particular need to address the distinction between NGOs and trade organisations.

FAIB suggest that accreditation possibilities to the EP should be extended to the other institutions, and that any accreditation of an individual should not give rise to the consideration of this individual as a "full-time" lobbyist in the TR.

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.

FAIB intends to communicate with its members relative to the ongoing review process and to inform them of any new rules in place as a result.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: IPRA (majority of members European)

Represented by: Mr Philip Sheppard

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.

According to the study of Aberdeen Business School, the Transparency Register is a success - IPRA would agree, a majority of actors are now registered. The review should now concentrate on introducing marginal improvements. There is an urgency to getting the Council on board, essentially because rules being introduced on the MS level are incompatible and there will be a strong need for harmonisation. The US system, was created for a different political system, is too burdensome for Brussels practices, and would entail high costs for the organisations concerned. The TR and its Code of Conduct is an exercise of transparency, not behaviour and this objective must not get lost under other ambitions.

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

IPRA favours a voluntary register.

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.

IPRA's members are on board. Most effective action to promote the register must take place within the institutions to promote its use by officials/ MEPs and Commissioners.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: SEAP (membership = individual)

Represented by: Ms Susanna Di Feliciantonio

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.

Meeting Transparency Register – Stakeholders

Date: 05 June 2013

Contributors: TRANSPARENCY Intl

Represented by: Mr Olivier Lewis and Ms Amanda Mc Menamin

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.

Lobbying is a legitimate exercise and TI supports levelling playing for all lobbyists. As of now, those who do not register have an unfair comparative advantage. (Our position regarding technical improvements to the TR is available [on our website](#).)

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

TI's main message is that the TR should give information about who is interacting with which institution: "who, when and how", i.e. more details about the lobbying activity itself. More focus should therefore be put on 1) the potential for a legislative footprint (to function like a bibliography), and 2) on meetings between officials and interest representatives.

TI supports a mandatory register, and in the meantime the TR should be made quasi-mandatory. Rules of procedure of the institutions and rules on consultation processes should be updated accordingly. The role of MEPs is different to that of EC officials, and there is a differentiation between the actors involved in interest representation (citizens/journalists/lobbyists/lawyers). These differentiations need to be better taken into account, i.e. rules should be different depending on the officials in question (in particular, whether they are from the Parliament or the Commission) and depending on the registrants concerned (e.g. whether they are acting as citizens, lobbyists or lawyers).

An incentive for registration in the TR could be to automatically pre-register those lobbyists (and their organisations) who sign the entry form at the entrance of EU buildings. Making this data public (while removing any sensitive private data, such as passport numbers or citizenships) would increase transparency and would create an incentive for these persons to complete the registration process online.

TI would welcome a legal opinion outlining the institutions' position regarding the possibility of a mandatory register. TI would also be interested to know the precise objectives of the TR, and what indicators will be used to review the TR.

TI would like to see the Council and the ECB joining the Transparency Register.

Within the Transparency Register, links should be provided between organisations to show which organisation is associated (membership, contractual relationship, informal alliance) by whatever means with other organisation on the register. This will allow the public and EU officials to understand when EU policy-making is influenced through several channels used by the same people/organisations.

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.

As of now the register's proper functioning depends on the good-will of interest representatives. TI believes that moving to a mandatory process would allow the register to reach our common goals in a more effective manner, as organisations interested in influencing EU policies would have to register and to abide by the rules.

Annex: <http://www.transparencyinternational.eu/2013/05/a-quick-reply-to-getting-it-right-on-transparency/>

BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Thursday 19 September 2013 14:03
To: 'MAIN@BUSINESSEUROPE.EU'
Cc: c.feustel@businesseurope.eu; SG TRANSPARENCY REGISTER CONTACT; trans-register@europarl.europa.eu; LEGRIS Gerard (SG)
Subject: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - BusinessEurope

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Beyrer,

I would like to inform you that the Members of the Joint EP-COM working group on the review of the register have all received now the document (in attachment) summarising your views about the review of the Transparency register following the series of meeting held earlier with the joint EP-COM secretariat at technical level as well as the meeting held with Vice President Šefčovič.

I also wish to inform you that the Members of this Working group, co-chaired by VP Wieland (EP) and Vice President Šefčovič (COM) have expressed the wish to have the opportunity to hear and discuss these views with you on the occasion of their upcoming session scheduled for Tuesday 15 October (8:30 AM to 10:30 AM) on the premises of the European Parliament in Brussels.

Please note that this mail is an advance information for your own planning, but that you will receive later a formal invitation to this meeting from the Chair.

Please also note that the invitation will be launched for up to two participants per organisation invited.



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Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



Commission européenne

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gerard.legris@ec.europa.eu

http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm



BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Thursday 19 September 2013 14:09
To: 'ralf.resch@ceep.eu'
Cc: SG TRANSPARENCY REGISTER CONTACT; trans-register@europarl.europa.eu; LEGRIS Gerard (SG); Pazanne DUPONT
Subject: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - CEEP

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Resch,

I would like to inform you that the Members of the Joint EP-COM working group on the review of the register have all received now the document (in attachment) summarising your views about the review of the Transparency register following the series of meeting held earlier with the joint EP-COM secretariat at technical level as well as the meeting held with Vice President Šefčovič.

I also wish to inform you that the Members of this Working group, co-chaired by VP Wieland (EP) and Vice President Šefčovič (COM) have expressed the wish to have the opportunity to hear and discuss these views with you on the occasion of their upcoming session scheduled for Tuesday 15 October (8:30 AM to 10:30 AM) on the premises of the European Parliament in Brussels.

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Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm



BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Thursday 19 September 2013 14:20
To: ██████████
Cc: SG TRANSPARENCY REGISTER CONTACT; trans-register@europarl.europa.eu; LEGRIS Gerard (SG)
Subject: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - Civil Society Contact Group

Follow Up Flag: Follow up
Flag Status: Completed

Dear ██████████

I would like to inform you that the Members of the Joint EP-COM working group on the review of the register have all received now the document (in attachment) summarising your views about the review of the Transparency register following the series of meeting held earlier with the joint EP-COM secretariat at technical level as well as the meeting held with Vice President Šefčovič.

I also wish to inform you that the Members of this Working group, co-chaired by VP Wieland (EP) and Vice President Šefčovič (COM) have expressed the wish to have the opportunity to hear and discuss these views with you on the occasion of their upcoming session scheduled for Tuesday 15 October (8:30 AM to 10:30 AM) on the premises of the European Parliament in Brussels.

Please note that this mail is an advance information for your own planning, but that you will receive later a formal invitation to this meeting from the Chair.

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Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm

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BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Thursday 19 September 2013 14:50
To: [REDACTED]
Cc: SG TRANSPARENCY REGISTER CONTACT; trans-register@europarl.europa.eu; LEGRIS Gerard (SG); [REDACTED]
Subject: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - EUROCITIES

Follow Up Flag: Follow up
Flag Status: Completed

Dear [REDACTED]

I would like to inform you that the Members of the Joint EP-COM working group on the review of the register have all received now the document (in attachment) summarising your views about the review of the Transparency register following the series of meeting held earlier with the joint EP-COM secretariat at technical level as well as the meeting held with Vice President Šefčovič.

I also wish to inform you that the Members of this Working group, co-chaired by VP Wieland (EP) and Vice President Šefčovič (COM) have expressed the wish to have the opportunity to hear and discuss these views with you on the occasion of their upcoming session scheduled for Tuesday 15 October (8:30 AM to 10:30 AM) on the premises of the European Parliament in Brussels.

Please note that this mail is an advance information for your own planning, but that you will receive later a formal invitation to this meeting from the Chair.

Please also note that the invitation will be launched for up to two participants per organisation invited.



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Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm

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BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Thursday 19 September 2013 14:00
To: [REDACTED]; Philip Sheppard
Cc: SG TRANSPARENCY REGISTER CONTACT; trans-register@europarl.europa.eu
Subject: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - IPRA

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Sheppard,

I would like to inform you that the Members of the Joint EP-COM working group on the review of the register have all received now the document (in attachment) summarising your views about the review of the Transparency register following the series of meeting held earlier with the joint EP-COM secretariat at technical level as well as the meeting held with Vice President Šefčovič.

I also wish to inform you that the Members of this Working group, co-chaired by VP Wieland (EP) and Vice President Šefčovič (COM) have expressed the wish to have the opportunity to hear and discuss these views with you on the occasion of their upcoming session scheduled for Tuesday 15 October (8:30 AM to 10:30 AM) on the premises of the European Parliament in Brussels.

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Please also note that the invitation will be launched for up to two participants per organisation invited.



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Best regards,

Gérard LEGRIS
Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm
http://europa.eu/transparency-register/index_fr.htm

BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Thursday 19 September 2013 14:45
To: rpatz@transparency.org
Cc: SG TRANSPARENCY REGISTER CONTACT; trans-register@europarl.europa.eu; LEGRIS Gerard (SG)
Subject: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - Transparency International

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Patz,

I would like to inform you that the Members of the Joint EP-COM working group on the review of the register have all received now the document (in attachment) summarising your views about the review of the Transparency register following the series of meeting held earlier with the joint EP-COM secretariat at technical level as well as the meeting held with Vice President Šefčovič.

I also wish to inform you that the Members of this Working group, co-chaired by VP Wieland (EP) and Vice President Šefčovič (COM) have expressed the wish to have the opportunity to hear and discuss these views with you on the occasion of their upcoming session scheduled for Tuesday 15 October (8:30 AM to 10:30 AM) on the premises of the European Parliament in Brussels.

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Please also note that the invitation will be launched for up to two participants per organisation invited.



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Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.

Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm

http://europa.eu/transparency-register/index_fr.htm



BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Thursday 26 September 2013 14:15
To: SG TRANSPARENCY REGISTER CONTACT
Subject: FW: FW: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - Transparency International

Follow Up Flag: Follow up
Flag Status: Completed

From: LINDER Christian (CAB-SEFCOVIC)
Sent: Thursday, September 26, 2013 10:41 AM
To: 'rpatz@transparency.org'
Cc: LEGRIS Gerard (SG)
Subject: FW: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - Transparency International

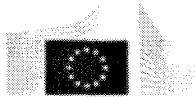
Dear Ronny,

Gérard asked me to reply to your e-mail.

We understand your need to know in advance where the discussion stands, but since the High Level Group is a joint EP - COM exercise, we cannot decide alone. Therefore, we informed the EP side of your request and it will be discussed in the next HLG meeting on Monday.

I hope we can give you the information next week.

Best regards,
Christian



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

From: Ronny Patz [<mailto:rpatz@transparency.org>]
Sent: Thursday, September 19, 2013 2:59 PM
To: LEGRIS Gerard (SG)
Cc: SG TRANSPARENCY REGISTER CONTACT; trans-register@europarl.europa.eu; Brussels
Subject: FW: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - Transparency International

Dear Mr Legris,

Thank you very much for this advance information, we have noted the date for the next stakeholder meeting in our calendar.

Would you be in a position to share the minutes of the previous meeting(s) of the Joint EP-COM working group and any working documents/discussion papers submitted for this (these) past meeting(s) as well as any similar documents produced for similar meetings in the future? Commissioner Sefcovic has tweeted some general topics discussed, but having more detailed insights would provide us with the possibility to better understand the discussions and to feed in most constructively ahead of, during, and after the meeting with both Vice-Presidents.

With kind regards,

Ronny

Ronny Patz
EU Communications & Policy Officer

Transparency International
Liaison Office to the EU
Rue Breydel 40, B-1040 Brussels, Belgium
EU Transparency Register N° 501222919-71

T. + 32 (0) 2 23 58 640
E. rpatz@transparency.org
Twitter: [@ti_eu](https://twitter.com/ti_eu)

From: Catherine.WICKHAM@ec.europa.eu [<mailto:Catherine.WICKHAM@ec.europa.eu>] **On Behalf Of** Gerard.Legris@ec.europa.eu
Sent: 19 September 2013 14:45
To: Ronny Patz
Cc: SG-TRANSPARENCY-REGISTER-CONTACT@ec.europa.eu; trans-register@europarl.europa.eu; Gerard.Legris@ec.europa.eu
Subject: Save the date - 15 Oct 2013 - Transparency Register Review - Exchange of views with the members of the Working group - Transparency International

Dear Mr Patz,

I would like to inform you that the Members of the Joint EP-COM working group on the review of the register have all received now the document (in attachment) summarising your views about the review of the Transparency register following the series of meeting held earlier with the joint EP-COM secretariat at technical level as well as the meeting held with Vice President Šefčovič.

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Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



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http://ec.europa.eu/dgs/secretariat_general/index_fr.htm
http://europa.eu/transparency-register/index_fr.htm

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BOSSUROY Melanie (SG)

From: Susanna Di Feliciantonio <Susanna.DiFeliciantonio@icaew.com>
Sent: Tuesday 29 January 2013 12:30
To: SG TRANSPARENCY REGISTER CONTACT; TRANSPARENCY-REGISTER (EP); LEGRIS Gerard (SG)
Cc: [REDACTED] dkolb@kelleneurope.com; Andreas Galanakis (AGA@amchameu.eu); 'president@seap.be'
Subject: SEAP feedback on EP accreditation ahead of 2nd technical stakeholder meeting
Follow Up Flag: Follow up
Flag Status: Completed

Dear Gérard,

As requested, I am pleased to provide some initial questions and suggestions in relation to the EP accreditation ahead of the second technical meeting with stakeholders next week.

I have briefly consulted with board members and have picked up comments made by SEAP members in recent months.

General principle

- **SEAP continues to call for re-instatement of an 'annual' access badge.** We believe this remains the least burdensome process (for our members as well as for parliamentary staff). We believe any obstacles are political and can be dealt with.

In the meantime, we propose some measures below which may help address / manage some of the current irritants with the system.

With kind regards,

Susanna

Online registration / renewal of accreditation

Members are generally happier with the new online process which is seen to be quick and effective when working. It is still a little burdensome to have to upload several different pdfs and perhaps this could be streamlined further.

Members have suggested that an electronic reminder sent 1 month before expiry would be helpful (as the badges no longer show the date of expiry). [*We understand that this might now be happening*].

There remain some queries about the certificate of 'good conduct' and whether members are likely to be asked to obtain a copy at some point. On the whole, the new system (letter accepting that a copy may be required) is preferable to the previous system (with previously stated problems).

Delays in getting badges

This remains **a major concern** raised by SEAP members, particularly at 'rush hour' times during committee weeks. Anecdotally, times can average from 20 to 40 minutes and often there is only 1 person on the desk or only 1 computer working. This is not only frustrating for our members but creates congestion for everyone using the ASP Luxembourg entrance.

In addition, as there is no way in advance of knowing how long the queues might be, members tend to assume at least 30 minutes waiting time often to find that the queues are shorter. In either case, this is a loss of business time.

Our suggestions

- **24-hour pre-registration:** we understand that this is being considered by the Parliament, as also mentioned by Niall O'Neill at last year's SEAP AGM. We would strongly welcome this.

- **A second desk:** we suggest opening up a second sign-in desk at the Josef Antall building. This would facilitate access to the JAN committee rooms and could lessen the queues at the ASP Luxembourg entrance.
- **KPIs on waiting times:** we would urge the Parliament to establish some basic key performance indicators on waiting times which would enable both Parliament and users of the system to monitor performance.
- **Information on expected waiting times according to day / time:** it would help our members to understand likely delays / peak 'congestion' times to collect passes according to week (committee / group / plenary) and time of day. This information could be provided online in the form of a chart / table / diagram (as is done, for instance, by airports (security wait times) – there are also multiple apps which provide data on all manner of waiting times). Ideally this could be made 'real-time'.
- **Data on average number of badges issued on a daily basis:** as one of the issues with the previous accreditation system was to manage the number of lobbyists in the Parliament buildings at any one time, we would welcome data on the average number of badges issued on a daily basis (again, distinguishing between committee / group / plenary weeks).
- **Paper rather than plastic cards.** We note concerns raised by other stakeholders about the environmental impact of issuing daily 'plastic' cards. While we believe that returning to an annual pass would deal with this, in the meantime we would support moves to investigate use of paper instead. Such a system is in operation, for example, in the UK Houses of Parliament.

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BOSSUROY Melanie (SG)

From: WICKHAM Catherine (SG) on behalf of LEGRIS Gerard (SG)
Sent: Monday 17 December 2012 16:03
To: WICKHAM Catherine (SG)
Cc: SG TRANSPARENCY REGISTER CONTACT
Subject: FW: Invitation - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (Transparency International)

Follow Up Flag: Follow up
Flag Status: Completed

From: Jana Mittermaier [<mailto:jmittermaier@transparency.org>]
Sent: Monday, December 17, 2012 3:37 PM
To: LEGRIS Gerard (SG)
Cc: Ronny Patz
Subject: RE: Invitation - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (Transparency International)

Dear Mr Legris,

Thank you for the invitation. My colleague, Ronny Patz, and I will participate in the meeting.

Kind wishes
Jana

Jana Mittermaier
Director EU Office
Transparency International
Rue Breydel 40, 1040 Brussels, Belgium
T. + 32 2 23 58 621
E. jmittermaier@transparency.org



From: Catherine.WICKHAM@ec.europa.eu [<mailto:Catherine.WICKHAM@ec.europa.eu>] **On Behalf Of** Gerard.Legris@ec.europa.eu
Sent: 14 December 2012 16:22
To: Jana Mittermaier
Cc: Gerard.Legris@ec.europa.eu; SG-TRANSPARENCY-REGISTER-CONTACT@ec.europa.eu; DGPRES-TRANSPARENCY-REGISTER-CONTACT@europarl.europa.eu
Subject: Invitation - Transparency Register Annual Report 2012 and 2013 review - Technical meeting for Stakeholders (Transparency International)

Ares(2012)1496820
Brussels, 14 December 2012

Dear Ms Mittermaier,

Please find enclosed an invitation to the Transparency Register Annual Report 2012 and 2013 review - Technical Meeting for Stakeholders on 15 January 2013.

Best regards,

Gérard LEGRIS

Coordinator EP-COM common secretariat of the Transparency register.
Chef d'unité "Transparence"



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http://europa.eu/transparency-register/index_fr.htm

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