



EPACA Response to the European Commission's European Transparency Initiative (ETI) Green Paper and Consultation

EPACA is pleased to have this opportunity to comment on the European Commission's ETI Green Paper. EPACA is the representative body of European public affairs consultancies. It represents 34 member companies employing more than 750 staff, representing some 70% of the EU public affairs consultancy market. EPACA believes that interest representation (lobbying) has a key role to play in modern representative democracies. Such activities play a vital role in communicating a variety of opinions to decision-makers and can often provide expertise to ensure that decisions are taken in a balanced and informed manner. EPACA also believes that these activities should be conducted transparently and be guided by the highest standards of ethical behaviour.

To this end, EPACA has its own code of conduct and disciplinary procedures. Indeed, the *raison d'être* for EPACA's formation was to formalise this code which has existed since the early 1990s and is virtually identical to that in the European Parliament's rules of procedure. Today, EPACA's code is the one of the most comprehensive and rigorously enforced codes within the Brussels-based public affairs community. All our member companies must sign the code, are responsible for ensuring it is respected by their staff, and are encouraged to make it a part of their staff employment contracts, breach of which is a dismissible offence.

We have reinforced this code by establishing an independent Professional Practices Panel to adjudicate on any alleged breaches of the code and make recommendations which would be made public. This further underlines EPACA's commitment to promoting the highest possible ethical standards within the public affairs industry. A copy of our code and our disciplinary process rules is attached. We are happy to supply further details if required.

EPACA is pleased to offer the following responses to the questions set out in the Green Paper.

Chapter 3

Question 6: Do you agree that it is desirable to introduce, at Community level, an obligation on Member States to make available information on beneficiaries of EU funds under shared management?



If so, what information should be required at national level? What would be the best means to make this information available?

6.1) EPACA believes that transparency in the use of public funds is a basic democratic requirement. This should apply at both EU and national levels.