

## Green Paper on the European Transparency Initiative CEMBUREAU Contribution

CEMBUREAU welcomes the opportunity to comment on the Green Paper on Transparency which was issued on 03 May 2006. After a brief introduction of CEMBUREAU, the European Cement Association, answers will be provided to the four questions raised in the Green Paper.

**CEMBUREAU** - The European Cement Association, based in Brussels, is the representative organisation of the cement industry in Europe. As of 1 June 2006, its Full Members are the national cement industry associations and cement companies of the European Union (with the exception of Cyprus, Latvia, Lithuania, Malta and Slovakia) plus Norway, Switzerland and Turkey. Latvia and Romania are Associate Members of CEMBUREAU.

The Association acts as spokesman for the cement industry before the European Union institutions and other public authorities, and communicates the industry's views on all issues and policy developments with regard to technical, environmental, energy and promotional issues. Permanent dialogue is maintained with EU institutions, international authorities and other international associations.

Serviced by a multi-national staff in Brussels and with the help of five Working Groups as well as a number of Task Forces set up on an ad hoc basis and directly reporting to the appropriate Working Group, CEMBUREAU takes action in relation to all developments at European level affecting the cement industry.

CEMBUREAU plays a significant role in the world-wide promotion of cement and the ready-mix and precast concrete industries in co-operation with Member Associations and other relevant organisations. The Association regularly co-hosts conferences on specific issues aimed at improving the market perception of the concrete industry and promoting the use of cement and concrete products.

Since its foundation in 1947, CEMBUREAU has developed into the major centre for the dissemination of data, statistics and general information on the cement industry world-wide. Its publications serve as the principal source of information on the cement industry throughout the world.

In 2005, the production of cement in the CEMBUREAU 25 Member Countries amounted to 289 million tonnes, representing about 12.7% of total world cement production (2.27 billion tonnes).

### **CEMBUREAU's Answers to the Transparency Questionnaire**

**Q** *Do you agree that efforts should be made to bring greater transparency to lobbying?*

**A** The answer is yes

**Q** *Do you agree that lobbyists who wish to be automatically alerted to consultations by the EU institutions should register and provide information, including on their objectives, financial situation and on the interests they represent? Do you agree that this information should be available to the general public? Who do you think should manage the register?*

**A** CEMBUREAU has no objections to provide all the information mentioned in this question and agrees to this information being made available to the general public, for example via the CONECCS database. In our opinion, the register should be managed by the Secretariat General of the European Commission through an established dialogue with the relevant organisations. This acceptance by CEMBUREAU is, however, subject to the following conditions:

1. The financial information to be given should be in the format established by Royal Decrees of 26 June 2003, 19 December 2003 and of 8 December 2004, in Belgium, in respect of the financial information to be given by ASBL and IASBL under Belgian law so as to avoid unnecessary duplication of the administrative burden for the relevant organisations.
2. The provision of financial information should be applicable to all players whether trade unions, NGOs, lobbying consultants or trade associations ...
3. CEMBUREAU insists that **registration of trade associations should be made under the heading "trade associations" and not under "lobbyists"**.

CEMBUREAU insists that registration should take into account the nature of the entity that is registering. In other words, the registration of a trade association should be made under the heading "trade associations" and not under "lobbyists", which we believe is too general a term, which moreover is not perceived in a positive manner in a number of countries.

Being alerted to consultations by the EU institutions is of course important but would not as such provide a strong incentive to register. It would be more of an incentive to simplify admission procedures to the EU Institutions for example by a single magnetic card. The formalities required for

admission to the European Parliament are excessively burdensome. A well designed card might provide the necessary security.

**Q** *Do you agree to consolidating the existing codes of conduct with a set of common minimum requirements? Who do you think should write the code?*

**A** Compliance with professional ethics is a personal matter rather than an obligation affecting organisations as such. All CEMBUREAU personnel involved in advocacy contacts with the European Commission are members of SEAP, Society of European Affairs Professionals. They have accepted to subscribe to the SEAP Code of Conduct (Annex 2) for which they have all been trained and for which they have received an accreditation. CEMBUREAU believes that self-policing is the best approach and that the Code of Conduct should apply to individuals rather than organisations. We think that the SEAP Code is a good basis and could either be adopted as such or form the keystone for a consolidated code of conduct.

**Q** *Do you agree that a new, inclusive external watchdog is needed to monitor compliance and that sanctions should be applied for any breach of the code?*

**A** Ideally self-discipline would be the best approach but, for CEMBUREAU, this would not be a sticking point. There should be an independent body, such as the Ombudsman, in the European Institutions in charge of controlling how self-discipline works over a trial period. After that trial period, there could be an exchange of views with the relevant organisations to assess whether the situation is satisfactory or further measures are needed.

CEMBUREAU will be happy to answer any further queries the European Commission may have on the present submission which may be regarded as a public document. The annexes hereto form part of our submission.

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D/6977/JMC/SK  
27 July 2006