

**MELO Edite (CAB-KALLAS)**

**From:** Legal-Eco [legal-eco@beuc.eu]  
**Sent:** jeudi 25 juin 2009 15:58  
**To:** CAB KALLAS WEB FEEDBACK; KALLAS Siim (CAB-KALLAS)  
**Cc:** Monique Goyens; Ursula Pahl  
**Subject:** Register for interest representatives  
**Attachments:** 173MgoUpa2009 Mr Kallas.pdf

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25 June 2009

***Register for interest representatives***

Dear Vice President,

I am writing on behalf of BEUC, the European Consumers Organisation with regard to your recent call for comments on the lobbyists' register. BEUC represents 42 national independent consumer organizations and has been a Brussels' based lobbying organization since 1962. More information about our mission, our members and our budget, including in particular clear information about how much money we spend for lobbying activities and the names of our staff who is engaged in lobbying, can be found in the Commission's register of interest representatives.[1]

BEUC has been active on the issue of lobby transparency since the beginning of the discussions, expressing our strong support for more transparency and calling for a compulsory register for lobbyists. Secret influencing of policy processes and secret policy-making will not enhance consumer/citizens confidence in the EU. We would therefore like to take this occasion to thank you for the efforts you put into this important initiative during this Commission's term of office.

However, when the register was launched one year ago it turned out to be disappointing, mainly because of its voluntary character combined with insufficient and not transparent financial data disclosure requirements. This is why we decided to join forces with an alliance of public interests organizations, the Civil Society Contact Group (CSCG), and to support their guidelines[2] which aim at improving the transparency of the information provided in the register. We participated in the CSCG press conference in October last year when the guidelines were presented to the public[3].

29/06/2009

BEUC signed up to the register according to the CSCG guidelines, thereby disclosing not only the yearly budget, but information of how much money of the budget is really spent on lobbying activities and who lobbies on behalf of the organization. We would not have had to provide this information according to the register's requirements. Nevertheless, only with this additional information a transparent picture is provided to the public.

To date, we have not heard of any Commission response to the CSCG guidelines. In view of the review of the register, we therefore would very much welcome to learn about whether the Commission considers taking into account the issues raised in these guidelines, and in particular providing guidance on how to calculate the costs for lobbying activities and to apply this requirement across all categories of the register.

Against the background of the recently published study of Alter-EU, which showed that only 24 % of the actual lobby groups in Brussels have signed up to the register, we also repeat our call for a mandatory register.

Furthermore, we would like to draw your attention to the fact that BEUC has since considerable time been calling on the Commission to publish all policy submissions that it receives. Besides information on who tries to influence EU decision making, and with what financial means, it is also crucial to ensure transparency on what is said and what arguments are put forward to the Commission. We hope that the Commission will soon address this missing element of the transparency initiative.

Finally, we were surprised to learn that already on Monday this week and without any publicly available assessment of the functioning of the register (at least as far as we are aware), its rate of coverage of EU lobbyists and in particular of Brussels' based lobbyists nor a (preliminary) indication or analyses of the responses received to the call for comments[4], the Commission declares that the voluntary approach will in any case be maintained[5]. We strongly regret this approach which in our view is contrary to improving the transparency of EU decision making processes.

Yours sincerely,

Monique Goyens  
Director General

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- [1] BEUC's register identification number is n° 9505781573-45.  
[2] "How to make a transparent registration in the European Commission Register of Interest Representatives", EU Civil Society contact group in co-operation with the Alliance for Lobbying Transparency and Ethics Regulation in the EU (Alter-EU), October 2008.  
[3] BEUC PR/044/2008 accessible at:  
<http://www.beuc.eu/Content/Default.asp?PageID=835&LanguageCode=en>  
[4] Consultation (?) with no clear deadline ("best before ....").  
[5] «Brussels lobbyists need not register», Financial Times, 22 June 2009.