

# EU Civil Society Contact Group

José Manuel Barroso  
President of the European Commission  
1049 Brussels

Brussels, 31 March 2008

## **Subject: Implementation of European Commission Lobbying Register**

Dear President of the European Commission,

On behalf of the public interest organisations united in the EU Civil Society Contact Group, we are writing to you to reiterate our support for a strong and meaningful register for interest representation in Brussels. The register should include names of lobbyists and give sufficiently precise information about the financing of lobbying activities. However we need to inform you that the members of the Civil Society Contact Group would be reluctant to associate their names to a register that obscures more than it reveals.

In the EU Civil Society Contact Group eight of the biggest European NGO platforms coming from different sectors - culture (EFAH), development (CONCORD), environment (Green 10), human rights (HRDN), lifelong learning (EUCIS-LLL), public health (EPHA), social issues (Social Platform) and equality between women and men (EWL) - are working together to develop a common vision for the European Union and to think about the role of public interest organisations in the European project.

The members of the EU Civil Society Contact Group have intensely discussed the register and code of conduct for interest representatives and have agreed to commonly express their concerns in this letter.

As public interest organisations committed to encouraging and promoting a transparent and structured civil dialogue that is accessible, properly facilitated, inclusive, fair and respectful of the autonomy of civil society organisations, we would be particularly alarmed should the European Commission backtrack on its commitment to establish increased transparency.

In the Civil Society Contact Group we believe that scrutiny and oversight of EU lobbying is in the public interest, as it would help to prevent (and if necessary to make public and stop) problematic cases of lobbying such as "front groups" or conflicts of interest. We are therefore committed to providing full transparency ourselves and we do expect representatives of private interests to meet the same standards.

Since the European Commission announced the European Transparency Initiative, the Civil Society Contact Group and its member organisations have contributed to the debate and consultations undertaken by your services. We had until now assumed that the names of individual lobbyists would be one of the central pieces of information in the register, as this is also the case in the US and the Canadian systems as well as in the register of the European Parliament.

In our understanding, the European Transparency Initiative intends to "ensure that the Union is *open to public scrutiny and accountable for its work*<sup>1</sup>". Not including names of lobbyists in the register would be contrary to this objective and therefore would simply fail to provide confidence in the EU institutions. As a

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<sup>1</sup> In the Green Paper European Transparency Initiative, p.2

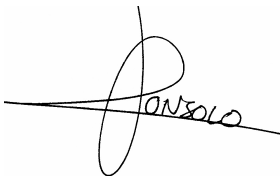
matter of fact people would still not have any real indication of the number of lobbyists working to influence EU decision-making, let alone know who exactly is lobbying EU legislators. This would not only reduce the usefulness of the register as a tool to prevent problematic lobbying practices, but it would also seriously undermine the credibility of the register and of the will of the European Commission to reduce suspicion and distrust.

Similarly, we want to urge you to ensure that the criteria for financial reporting will be clear and sufficiently detailed so as to give the public an easily accessible, informative and factual overview of lobbying activities at EU level.

We do welcome the consultation that your services have undertaken and we believe it is time to take a decisive step towards improved EU lobbying transparency. The standards set by the Commission register will determine to a large extent the level of lobbying transparency in the EU for the coming years. This is a great responsibility and we trust you will ensure that the register of interest representatives will meet high transparency benchmarks, so that we can wholeheartedly endorse it and recommend our member groups to enregister.

As you will understand, public interest organisations would be reluctant to associate their names to a register that obscures rather than reveals.

Yours sincerely,



Olivier Consolo  
Director CONCORD



Fintan Farrell  
President Social Platform



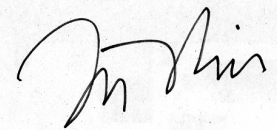
Ilona Kish  
Secretary General EFAH



Kirsti Kolthoff  
President EWL



Monika Kosinska  
Secretary General EPHA



Jorgo Riss  
Green10 Representative



Jean-Marc Roirant  
President EUCIS-LLL



Liz Scurfield  
HRDN Representative

P.S. The same or a similar letter is being sent to Commissioner Siim Kallas, Commissioner Margot Wallström and Commission Secretary General Catherine Day.

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The CSCG brings together eight large European NGO platforms in the following fields: culture (EFAH), development (CONCORD), environment (Green 10), human rights (HRDN), lifelong learning (EUCIS), public health (EPHA), social (Social Platform) and women (EWL). Together we work to develop the dialogue between civil society organisations and the EU institutions as an essential part of strengthening participatory democracy.