



**Joint Transparency
Register Secretariat**



Brussels, **20 OCT. 2015**

Ms Vicky CANN
Lobbycracy campaigner
Corporate Europe Observatory

Sent by email only:
vicky@corporateeurope.org

Ref. alerts: TR-C-2015-10
TR-C-2015-11
TR-C-2015-12
TR-C-2015-13
TR-C-2015-14

Dear Ms Cann,

On 27 July 2015 you submitted on behalf of ALTER-EU a complaint bringing to the attention of the Joint Transparency Register Secretariat (JTRS) information relating to five entities on the Register that you considered in breach of the Register's Code of Conduct point (d)¹. In particular, for all five cases, you highlighted what in your view were unrealistically low amounts indicated under the heading 'lobbying costs.' I am herewith writing to inform you of the follow-up given to this alert and of the outcome of our exchanges with the registrants concerned.

The five entries subject to your complaint were the following:

1. Cisco Systems Inc (ID 494613715191-85)
2. AeroSpace and Defence Industries Association of Europe (ID 72699997886-57)
3. Conseil de Coopération Economique (ID 260656615546-60)
4. European Round Table of Industrialists (ID 25487567824-45)
5. Union Européenne du Commerce du Bétail et des Métiers de la Viande (ID 4422649896-52)

The JTRS informed you on 21 August 2015 that these cases of alleged factual errors potentially falling under point (d) of the Code would be dealt with as 'alerts'.

¹ Code of Conduct point (d) states: "ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the Register, is complete, up-to-date and not misleading; accept that all information provided is subject to review and agree to co-operate with administrative requests for complementary information and updates."

On 24 August 2015, the JTRS wrote to ASD, CCE and ERTI with a request to correct their entry in line with the Register Guidelines² or to provide additional explanations in their registrations about the calculation of the costs relating to activities covered by the Register.

The other two organisations, *Cisco Systems Inc* and *Union Européenne du Commerce du Bétail et des Métiers de la Viande*, had by that time already updated the relevant data and therefore it was considered that no further follow-up was required. Both organisations acknowledged that they committed mistakes unintentionally when initially providing the figures in the Register.

The three remaining organisations have updated their data too as of 15 October 2015. Four out of the five organisations have specified an increase in their lobby expenditure. The *Conseil de Coopération Economique* which reported lobbying costs totalling €<9,999 for the year 2014 has now declared a precise amount of €9,500 at the same time providing a complementary justification about their calculation method. The CCE has also explained that, whilst acting in good faith, it had wrongly interpreted the Register Guidelines and its previous declaration of €250,000 - €300,000 was in fact erroneous. It has also decided that, taking into account the nature of its activities, section IV (think-tanks) better corresponds, and has duly transferred its registration to this section.

The JTRS considers all updates made satisfactory. In this respect, we have decided to close the entirety of this alert with no further follow-up.

Yours sincerely,



Martin Kröger
Coordinator of the
Joint Transparency Register Secretariat (JTRS)

² <http://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do;TRPUBLICID-prod=1vyvWfLBhdjLmCJbbWTpr6RGtgycsr6xGfTQ0W5Hmp2swlh6wwY!-224471112?locale=en&reference=GUIDELINES>