

First Vice President Frans Timmermans
European Commission
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Belgium



Brussels, 4th November 2015

Dear Vice President Timmermans

We are writing to raise some urgent concerns about the way in which the Commission publishes data about lobby meetings held by Commissioners and senior Commission officials.

It appears, following a discussion with a member of Commission staff in the Joint Transparency Register Secretary (JTRS), that the Commission only records and publishes meetings on its website with lobbyists who are on the EU's lobby register.

Meetings with unregistered organisations were also announced in the Commissioners' official agendas (even though there is no certainty that they actually took place). Commission President Jean-Claude Juncker's agenda lists a meeting with a delegation from the EU-Japan Business Round Table, despite the organisation not being listed in the transparency register. Similarly, First Vice-President Timmermans' agenda includes a "meeting with Danish Business Forum for Simpler Rules hosted by Mr Michael Ring, CEO of STELTON". Neither the Danish Business Forum for Simpler Rules nor Stelton are in the transparency register. Research, Science and Innovation Commissioner Carlos Moedas lists a meeting with the unregistered company Aeromobil, and Competition Commissioner Margrethe Vestager scheduled an encounter with the unregistered Danish Regional Banking Association.

ALTER-EU strongly supports the principle that the Commission should not meet with unregistered lobbyists, and we hope that no meetings have been held with unregistered lobbyists. However, it is important that all lobby meetings are recorded and reported, whether they were held with registered or unregistered lobbyists.

What processes are followed by the College of Commissioners, Cabinets and Directors-General to ensure that no lobby meeting is held with unregistered lobbyists?

Can you confirm that the current process for recording and reporting Commission lobby meetings ensures that all lobby meetings held by officials covered by the rules are recorded and reported upon, even if they are with unregistered lobbyists?

While the Commission decision to make transparent the meetings held by senior officials with lobbyists was welcomed, the way in which the policy has been implemented is far from ideal.

The quality of the published data about meetings varies significantly from DG to DG, Commissioner to Commissioner, with little consistency. For example, it is clear that the present data does not accurately reflect the full composition of the meetings held. **When a group of companies or NGOs meet with the Commission, it appears that some Commissioners and DGs choose to only record the lead organisation (or the umbrella organisation), rather than each and every lobby group in attendance.** Not listing all organisations in attendance distorts the overall data and will lead to the under-reporting of lobbying; this needs to be changed and all parts of the Commission should publish consistent data.

Meanwhile, too often the subject of the meeting is not adequately reported. Formulations such as "introductory meeting" or "[lobby organisation's name] agenda" or others are used which are too vague to be meaningful. Instead, **each and every legislative dossier and or issue touched upon in a meeting should be recorded as the subject(s) of a meeting.**

We consider that further changes are needed in the Commission's policy in this area.

Lobby consultancies and law firms should be required to make clear which clients are being represented when it holds lobby meetings with the Commission and this information should also be published. It is surely a fundamental component of lobby transparency that it is always clear which interests are being represented at any given time.

Finally, publishing the data across dozens of different web pages is highly problematic and makes it hard for citizens, journalists and civil society organisations to effectively scrutinise the data. We note that Transparency International IntegrityWatch's project collates the data into one site. **If an NGO can do this, could the Commission not set up a similar one-stop-shop web page, with search and sort functions?**

As an additional, and separate point, **we consider it a major omission that the Commission does not publish the names of the individual lobbyists that it meets.** In our view, all individual lobbyists attending meetings with the Commission should agree to this before attending a meeting; it could even be a condition of the meeting. In our view, such a step would greatly boost transparency and aide the monitoring of the revolving door between the EU institutions and lobby organisations. We hope that the relevant Commission decisions could be revised to reflect this point in the near future.

We would like to take this opportunity to remind you that ALTER-EU is very keen to see the present rules which currently apply only to senior Commission staff applied throughout the Commission. This would mean that no Commission official would meet with any unregistered lobbyist and that all lobby meetings held by any official would be recorded and reported.

We look forward to your response on each of these important points.

Yours sincerely,

ALTER-EU steering committee:

Helen Darbishire	Access Info Europe
Paul de Clerck	Friends of the Earth Europe
William Dinan	SpinWatch
Olivier Hoedeman	Corporate Europe Observatory
Nina Katzemich	LobbyControl
Jorgo Riss	Greenpeace European Unit
Yuklan Wong	European Federation of Journalists