

José Manuel Barroso  
President of the European Commission  
1049 Brussels

Brussels, 28 May 2008

## **Subject: Commission Register for Interest Representatives**

Dear President of the European Commission,

We are writing to you after the services of the Secretary General presented to several of us the voluntary Commission Register for Interest Representatives, which we understand you plan to launch on 23 June. This register is possibly the element of your *European Transparency Initiative* that will generate the most public interest and debate.

We are highly concerned that the version of the register prepared on your behalf by the Secretary General is fundamentally flawed in at least two important aspects:

1. The draft register requests **different types of financial information from the different types of actors**. For-profit lobbying organisations are asked to report approximate figures related to lobbying expenditure, while public interest organisations are asked to provide total budget figures. This means that the register will not provide comparable financial information to the public.

To ensure transparency and equal treatment of all actors engaged in interest representation the rules for financial disclosure must be equitable. The Civil Society Contact Group urges you to ensure that:

- Commercial as well as public interest representatives disclose their total budget and the (estimation of) lobbying budget (in ranges of 10.000 Euro).
- Commercial as well as public interest representatives indicate public and private income sources.

2. The draft register is **limited to organisations** and does not request the registration of individual lobbyists working for them. This means that the register will not make public any information about the number of lobbyists working at EU level, nor who they work for. We urge you to put the proposed Commission register in line with basic transparency standards by including lobbyists' names.

In the past, you have expressed a commitment to "ensure that the Union is open to public scrutiny". If you were to launch the register in its current form, it would undermine your previously expressed commitment and give the impression that the European Commission is unwilling to improve transparency

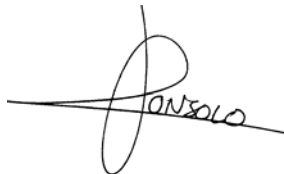
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EU Civil Society Contact Group, c/o Social Platform, Square de Meeûs 18, 1050-Brussels, Belgium  
T +32-2-511 17 11 • F +32-2-511 19 09 • [www.act4europe.org](http://www.act4europe.org) • [coordinator@act4europe.org](mailto:coordinator@act4europe.org)

The Civil Society Contact Group brings together eight large European NGO platforms in the following fields: culture (culture action europe), development (CONCORD), environment (Green 10), human rights (HRDN), lifelong learning (EUCIS-LLL), 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.

of lobbying at EU level. A meaningful public scrutiny can only occur if the provided information is relevant and comparable. We therefore call on you to respond positively to the proposals in this letter.

Yours sincerely,



Olivier Consolo  
Director CONCORD



Ilona Kish  
Secretary General culture action europe



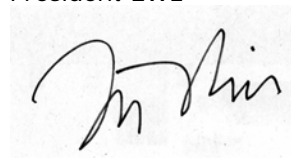
Kirsti Kolthoff  
President EWL



Monika Kosinska  
Secretary General EPHA



Conny Reuter  
President Social Platform



Jorgo Riss  
Green10 Representative



Jean-Marc Roirant  
President EUCIS-LLL



Liz Scurfield  
HRDN Representative

P.S. We sent the same letter to Commission president Commissioner Siim Kallas, Margot Wallström, Marianne Fischer Boel, Danuta Hübner and Commission Secretary General Catherine Day.

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