ALTER EU submission
to the consultation on the ETI Green Paper – Chapter 2

Introductory remarks:

The Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU), brings together over 140 civil society groups, trade unions and public affairs firms from across the EU. We believe that transparency around EU lobbying is currently insufficient. ALTER-EU would like the EU to adopt effective measures that will allow for public scrutiny of EU decision-making.

For more information about ALTER-EU please visit our website:
http://www.alter-eu.org/about

Feedback on application of the minimum standards for consultation

Question: In your view, has the Commission applied the general principles and minimum standards for consultation in a satisfactory manner? You may refer to the individual standards (provided for ease of reference, in annex 2)

ALTER-EU believes that for the consultation standards to be meaningful, they need to be extended to include clear guidance on the standards to be expected even where a formal consultation is not taking place. The ALTER-EU statement from May 2005[1] calls upon to the Commission to "terminate cases of privileged access and undue influence granted to corporate lobbyists". For example, joint taskforces in which corporate interests are represented while public interest NGOs are not should be abolished. The Cars 21 group is one such body. It consists of Commission officials, CEOs and lobbyists from the automobile industry, but had no representation from any environmental NGOs. We also believe that the privileged status accorded to business lobby groups like the European Services Forum and the Trans-Atlantic Business Dialogue should be stopped.

A recent example of this tendency to provide privileged access to certain interest groups is the High Level Group on Competitiveness, Energy and the Environment. The composition of this group is clearly biased in favour of industry. Of the 18 external members 12 come from the industry (including the World Business Council on Sustainable Development). There are only two representatives from environmental interests and one trade unionist. Consumers are only represented by the Dutch Competition Authority, not by their own associations. In addition, the industry representation is biased towards energy-intensive industries, whereas there is no genuine renewable energy company represented nor any of the new competitors to the traditional energy and power suppliers.

Given its composition it seems very unclear how this group can achieve adequate and balanced results on the functioning of energy markets or take the necessary and difficult political decisions to tackle climate change. Obviously, the HLG doesn't meet the minimum standards for normal consultation, especially standard B on consultation target groups.

We would like to express our regret and disappointment that these important problems are not addressed in the Green Paper. Measures in these areas are of crucial importance for the credibility of the European Commission and we strongly recommend that the Commission propose concrete measures to ensure consultative balance in the context of the ETI.

This submission has been prepared by the ALTER EU Steering Committee:

Paul de Clerck (Friends of the Earth Europe)

William Dinan (Strathclyde University)

Ulrich Müller (LobbyControl)

Jorgo Riss (Greenpeace European Unit)

Erik Wesselius (Corporate Europe Observatory)

Notes:

[1] Ending corporate privileges and secrecy around lobbying in the European Union, ALTER-EU Statement, May 2005. http://www.alter-eu.org/statement