



Joint Transparency
Register Secretariat



Ms Vicky CANN
Alter-EU

By email only:
vicky@corporateeurope.org

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

21 AOUT 2015

Dear Ms Cann,

Thank you for your complaint of 27 July 2015 submitted on behalf of ALTER-EU and bringing to the attention of the Joint Transparency Register Secretariat (JTRS) information relating to the data declared by five entities in the Register that you consider are in breach of the Register's Code of Conduct point (d): *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;*

The five entries subject to your complaint are the following:

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

When the JTRS receives information about possible breaches of the Code of Conduct, cases of factual errors potentially falling under point (d) of the Code are dealt with as 'alerts', whereas breaches of any other points of the Code are more generally dealt with as 'complaints'. This technical distinction (resulting from the Interinstitutional Agreement on the Transparency Register) does not affect the determination of the JTRS to investigate the substance of any allegations and to contact the concerned registrants to seek an explanation and, if necessary, to ask them to update their registration as appropriate.

Our preliminary assessment of the cases ALTER-EU has brought to our attention indicates that there are sufficient grounds to investigate possible underreporting of expenditure related to activities falling under the scope of the Register on the part of three of the five registrants, namely: AeroSpace and Defence Industries Association of Europe (ASD), Conseil de Coopération Economique and European Round Table of Industrialists. We will approach these three organisations, with a request to provide an adequate explanation for their calculation and will, if deemed necessary, ask them to rectify incorrect data or to provide additional information in their registrations.

We are pleased to inform you that, in the meantime, the other two organisations, Cisco Systems Inc and Union Européenne du Commerce du Bétail et des Métiers de la Viande, have updated the relevant data and therefore no further follow-up measures are required.

Yours sincerely,



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