

From:
ALTER-EU
The Alliance for Lobbying Transparency and Ethics Regulation
Rue d'Edimbourg 26
1050 Bruxelles



To: MEPs on JURI committee

25 April 2012

Dear Member of the European Parliament,

The [Alliance for Lobbying Transparency and Ethics Regulation](#) (ALTER-EU) is writing in advance of today's vote on the JURI committee's report, drafted by Mrs Dagmar Roth-Behrendt, on the Staff Regulations proposal.

ALTER-EU strongly recommends that Members of the JURI committee support compromise amendments AMC 2 and 9. We do not support compromise amendment AMC 1 as we do not believe that it strengthens the current regulations, but in fact represents an unintended weakening of them. We instead support the original amendments 31, 32, 33, 34 and CONT 11 tabled on this issue.

As you may know, the Staff Regulations contain the ethics rules which govern 55,000 or more officials who work across the EU institutions. ALTER-EU considers that the current process to reform the Staff Regulations provides an opportunity to improve these ethics rules, especially those that relate to conflicts of interest during and after EU staff work for the EU. In particular, we believe that the current rules governing the 'revolving door' - when EU staff move between the EU institutions and the Brussels lobby industry creating the risk of conflicts of interest - are inadequate and in need of urgent reform. We have documented a wide range of cases in which officials or former officials have undertaken job moves which created the risk of conflicts of interest, but where the EU institution response was inadequate. More information about specific cases can be found on the ALTER-EU website, including a detailed report with further information: <http://www.alter-eu.org/revolving-doors/>

As a result, ALTER-EU considers that there should be:

- A mandatory cooling-off period of at least two years for all EU institution staff members entering new posts which involve lobbying or advising on lobbying, or any other role which provoke a conflict of interest with their work as an EU staff member
- A ban on any EU institution staff member undertaking a sabbatical which involves lobbying, providing lobbying advice, or which provokes a conflict of interest with their work as an EU staff member
- Full scrutiny of potential conflicts of interest when staff join the EU institutions. Where there is a potential conflict of interest between their old job and their new EU role, those persons must be recused from such handling matters
- Transparency of 'revolving door' cases on EU institutions' websites

ALTER-EU strongly recommends that Members of the JURI committee:

- **support compromise amendments 2 (revolving doors) and 9 (leave on personal grounds)**
- **oppose compromise amendment 1 (conflicts of interest/ revolving doors) and instead support original amendments 31, 32, 33, 34 and CONT 11**

Kind regards,

Vicky Cann