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(Angelone Francesco) The proposal submitted by the European Commission on the revision of the Transparency Register is arousing, predictably, a heated debate.

It appears that it circumscribes the lobbying to "interactions" with policy-makers and decision-makers and, therefore, should be considered too ambiguous and timid. If it is true that the definition

of lobbying would remain virtually the one currently in force, namely the promotion of interests with the EU institutions in order to influence policy and legislation, it seems that the entry in the register will become mandatory only if such promotion is substantiates in interactions with decision makers. This emerges from a narrow reading of 'Article 5 of the Commission's draft interinstitutional agreement that speaks of access to institutions, meetings, participation in public consultations and correspondence.

The consequence of such a reading is quite clear. That excludes from this definition, research, media campaigns, organization of events, albeit not in the form of direct interactions, have always the objective of influencing the policy making process at EU level. Thus, as a further consequence, there would not even need to declare the costs incurred for these activities and the number of people employed in them.

Contrary to what the evil may think, though, the issue concerned not only those who claim greater transparency in the legislative process but the same lobbying firm, whose customers pay for so-called phase of engagement with decision-makers but also for all those activities back-office, planning and consultancy that lobbyists fielding. An article of **LobbyFacts** clearly shows this situation where **the top 20 lobbying companies operating in Brussels have held only 203 meetings with senior officials of the Commission since December 2014**, when the Commission began issuing the Commissioners meetings, general managers and members of the cabinets with lobbyists. A given anomalous when compared to that of NGOs or multinational companies like Google, which in the same period he met the same well 117 times interlocutors.

Indicative example of **Fleishman-Hillard**, the lobbying firm that says the higher costs to their operations (more than 6.25 million euros per year), which has 48 passes to the European Parliament ar

think that such costs correspond only to direc

is somewhat unrealistic

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in only four high-level meeting with the Commission. It can challenge, as does LobbyFacts, which in this kind of meeting customers participate directly and, instead, the lobbyists have previously prepared the field with lower-level meetings. Thesis contradicted, however, by an article of ALTER-EU (*Alliance for Lobbying Transparency and Ethics Regulation*). In short, it is in the activity behind the scenes that the lobbying firm (and law firms) spend energy and resources and is especially for those that are paid.

A question arises naturally: how much of these costs claimed will disappear from the Registry for Transparency if the lobbying firm will be obliged to notify only the costs incurred for direct interaction with officials and parliamentarians? Assuming that the majority of the same, doubts about the validity of the Commission proposal for a registry change by Commissioner Timmermans in late September are becoming more concrete.

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