



Brussels, 12-3-2012

Dear Commissioner Šefčovič,

Revolving doors

We are writing, as a group of Brussels-based organisations which support transparent and accountable public policy-making, to ask you to take firm action regarding the current rules regulating what is more broadly known as the ‘revolving door’ between the European institutions, including the Commission, and the EU lobby industry.

When EU institution staff members leave public service and become lobbyists, conflicts of interest may arise and which can damage the integrity of the public policy-making process and the reputation of the European institutions.

As Transparency International¹ points out, such conflicts of interest can take the form of:

- Abuse of office – where a public official might use his influence to shape a policy or decide to ingratiate himself with companies which might later hire him
- Undue influence – where a former official working for a company influences his former colleagues to favour the company
- Switching sides – where a former official moves to a private sector role which requires him to oppose his previous institution on an issue where he used to represent the institution
- Regulatory capture – where current officials are overly sympathetic to the industry they must regulate because they used to work in that industry

Conflicts of interest can be direct or indirect and they require strong, clear rules and enforcement mechanisms to eliminate the risk that they will arise.

We are aware that the EU institutions already have rules which are meant to prevent conflicts of interest from arising when staff leave or join the European institutions, but we are concerned that they are not sufficiently effective and are not being correctly implemented. This has been highlighted in a recent report by the Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU) with gives several specific examples.²

¹ Transparency International. *Cabs for Hire? Fixing the Revolving Door between Government and Business*. London. May 2011.

² Alter-EU. *Block the revolving door: why we need to stop EU officials becoming lobbyists*. November 2011.

In addition, there is concern that the staff from the EU institutions are not always aware of their obligations as set out in the Staff Regulations; that some staff are excluded from consideration under the rules; and that the European institutions are reluctant to implement cooling-off periods. We also note that there is little proactive transparency surrounding this area.

We believe this matter should be urgently reviewed and addressed, as part of the current revision of the Staff Regulations, with a view to strengthening the rules and ensuring that everyone is aware of them and that they are properly enforced in an open and transparent manner. We would be happy to share with you recommendations on specific changes to the rules as well as observations of the current system.

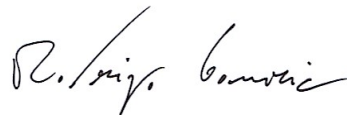
We look forward to hearing from you.

Yours sincerely,

Mr Jan Willem Goudriaan
Deputy General Secretary
EPSU



Mr Rodrigo Goveia
Secretary-General
EuroCoop



Mr Paul de Clerck,
Steering committee member
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