

Brussels, 27 July 2012

Transparency Consultation

ORGALIME COMMENTS (*in italics*)

The objective of this consultation is to collect data that will be used to prepare the annual report on the operation of the Register, as provided for by point 27 of the Agreement between the European Parliament and the European Commission on the establishment of a transparency register for organisations and self-employed individuals engaged in EU policy-making and policy implementation.

Questions marked with an asterisk require an answer to be given.

Information about the contributor to the consultation

Is your organisation registered with the Transparency register ? *

Yes

Name or organization as it appears in the register: *

Orgalime

Name or organization name *

Orgalime

Please enter your email address

Adrian.harris@orgalime.org

What is your transparency Register identification number?

20210641335-88

To what section does your organization belong,

- *In-house lobbyists and trade/professional associations*

Please specify:

- *Other similar organisations*

Please specify: *Trade association*

In what country does your organisation have its head office?

Belgium

Does your organisation have an office in Brussels?

Yes

QUESTIONNAIRE FOR THOSE REGISTERED IN THE TRANSPARENCY REGISTER

WHY DID YOUR ORGANISATION REGISTER IN THE TRANSPARENCY REGISTER? (select as many as apply)

- *We wish to be open/public about our participation in the EU decision-making process.*

Orgalime, the European Engineering Industries Association, speaks for 37 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 22 European countries. The industry employs some 10.2 million people in the EU and in 2011 accounted for some €1,666 billion of annual output. The industry not only represents some 28% of the output of manufactured products but also a third of the manufactured exports of the European Union.

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- We wish to conduct our activities in a transparent, ethical manner.
- We wish to be alerted when public consultations are opened in certain fields.
- We wish to be alerted when the European Commission publishes new roadmaps in certain fields.
- In order to be eligible for badges offering long-term access to the European Parliament's buildings.
- Other

Please explain:

We are a long standing association which was set up at the time of the European Coal and Steel Community and feel it is essential, for our brand, to be transparent about our membership and about the views of our membership on the European issues with which we deal.

In order for us to be able to work efficiently and to provide timely input, it is important that we should be made aware of the proposals of the Commission "in the pipeline": therefore the roadmaps are very welcome. On the issue of public consultations, we feel that the notification system is useful, although we are sometimes concerned by the number of consultations and the fact that some of them seem to pre-suggest options, such as further regulation without considering the "no action" option. There are too often simple questions which do not leave enough room for comments.

I BELONG TO A NETWORK THAT ENCOURAGED ITS MEMBERS TO REGISTER.

Yes

If yes, did that encouragement make you register sooner than you would have otherwise?

No. We have been registered for many years in the Commission's data bases.

HAVE YOU YOURSELF ENCOURAGED OTHER ORGANISATIONS TO REGISTER WITH THE TRANSPARENCY REGISTER?

Yes

If yes, why?

Because we believe that it is important for all organizations with which policymakers are in contact to be open as to whom they represent, how they are financed, what their particular areas of interest are. It is also important, in our view, that policymakers should consult the register in order to know whether organisations are in fact registered and to understand who and what they represent.

DO YOU THINK THAT APPEARING IN THE REGISTER REFLECTS POSITIVELY ON YOUR ORGANISATION?

Yes

IS THE INFORMATION ON THE WEBSITE ABOUT HOW TO REGISTER CLEAR ENOUGH?

Yes

HOW CLEAR/EASY TO FIND IS THE FOLLOWING INFORMATION ON THE TRANSPARENCY REGISTER'S INTERNET SITE?

Homepage http://europa.eu/transparency-register/index_en.htm	Very clear
Official documents	Very clear
Registration form	Very clear
Updating information for your organisation	Very clear
Request form for European Parliament accreditation	Very clear
Documentation to help you register - This documentation includes guidelines, frequently asked questions, forms in pdf format, etc.	Not clear
Consultation of the list of registered organisations	Very clear
Search form http://ec.europa.eu/transparencyregister/public/consultation/search.do?reset=&locale=en#en	No opinion
Statistics <i>Given link not working</i>	No opinion

The European Engineering Industries Association

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How could we improve the [documentation](#) to help you register?

If you answered "Not clear", please tell us how this could be improved.

TR GUID FIN 03/2011 (rev March 2012) – Cost estimate is clear and helpful. Thank You.

However TR GUID OE 2/2011 (rev March 2012) –contradicts these principles and undermines the whole purpose of establishing a detailed cost estimate.

It is important to understand that asking for accreditation to the European Parliament is done for practical reasons, so as not to have to queue typically between ½ and 1 hour to meet an MEP or an assistant. Even if one visits the European Parliament only a few times a year, it is a pity to see that access to the democratically elected representatives should have become more difficult: we believe that an open, transparent and regular dialogue between representatives of the European institutions and representative associations, which is enshrined in article 11(2) of the Treaty of the European Union, is essential to ensure that members of the EU institutions, including democratically elected representatives of the European Parliament, are able to obtain the required information to discuss and arrive at an informed opinion and decision on proposals, reports and policies developed by the European institutions.

HOW CLEAR IS THE YOU RECEIVE WHEN YOU SIGN UP FOR THE DOCUMENTATION TRANSPARENCY REGISTER?

Guidelines http://europa.eu/transparency-register/your-organisation/guidance-financial/index_en.htm	Very clear
Frequently asked questions http://europa.eu/transparency-register/your-organisation/faq/index_en.htm	Clear
Registration form http://ec.europa.eu/transparencyregister/public/ri/registering.do?locale=en#en	Very clear
Code of conduct http://europa.eu/transparency-register/about-register/code-of-conduct/index_en.htm	Very clear
Complaint mechanism and sanctions http://europa.eu/transparency-register/complaints/complaint-mechanism/index_en.htm	Clear

Are there other documents that would be helpful when signing up for the Transparency Register?

Not needed

WHEN YOU REGISTERED, DID YOU HAVE ANY DIFFICULTY FILLING OUT THE FOLLOWING FIELDS?

No

HAVE YOU CONTACTED THE HELPDESK (BY TELEPHONE OR E-MAIL)?

Yes

If yes, were you satisfied with the help provided?

Not really.

If no, please explain:

We get contacted automatically for an update of our entry every year. For most organisations, the main update will be at the level of the financial figures for the preceding year. Therefore it makes sense, as these figures are usually approved by General Assemblies mid-year to update our entries at that time. It is therefore a waste of time to have to also update one's entry into the register at another moment, if there have been no material changes to the information provided to the register.

HAVE YOU ENTERED ONE OR MORE REQUESTS FOR EUROPEAN PARLIAMENT ACCREDITATION?

Yes

If yes, did you use the online form?

The European Engineering Industries Association

Yes

If yes, were you satisfied with the way your request was handled?

Yes – a major improvement. Thank you.

Comment: speeding up the accreditation procedure was long overdue.

However the issue of a new pass at every visit to the European Parliament is both a waste of time and money and does not seem very environmentally friendly. Why not go back to the technical passes with an automatic registration of the person each time they enter the Parliament and a photo check at security? See also comments hereunder.

HOW CLEAR WAS THE INFORMATION ON FOR THE REQUESTING ACCREDITATION EUROPEAN PARLIAMENT?

"How to request European Parliament accreditation" http://europa.eu/transparency-register/request-ep/index_en.htm	Clear
Request form for European Parliament accreditation https://webgate.ec.europa.eu/transparencyregister/restricted/ri/authenticate.do?target_param=manageAccreditationsView&locale=en#en	Clear

How could we more clearly explain the procedure for requesting European Parliament accreditation?

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WHAT ADDITIONAL BENEFITS/PRACTICAL CONSEQUENCES WOULD YOU LIKE TO GAIN FROM SIGNING UP FOR THE TRANSPARENCY REGISTER? (vis-à-vis the European Commission and/or European Parliament)?

It would be much simpler, less wasteful and more appropriate for a modern administration to issue regular visitors to the EU institutions, who are registered, with technical passes with an automatic registration of the person each time they enter the building of a European institution. A photo check at security would complement this registration. The same pass could then be used for registration at the Commission, European Parliament, Council, ECOSOC and COR buildings, even if there are different access rights to each of these.

WOULD YOU LIKE TO SEE REGISTRANTS OBLIGED TO DISCLOSE MORE INFORMATION THAN THEY DO CURRENTLY?

No

DO YOU HAVE ANY OTHER COMMENTS?

No

CONFIDENTIALITY

The contributions received and the identity of the contributor will be published on the Internet, unless the contributor is opposed to the publication of personal data for fear that this would damage his/her legitimate interests, in which case the contribution May be published in anonymous form.

Do you authorise the European Commission to publish your contribution?

Yes

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