

**Brussels, 20 May 2016**

## **Orgalime Response to the Public Consultation on a Proposal for a Mandatory Transparency Register**

The European Commission seeks the views of all interested parties on the performance of the current Transparency Register for organisations and self-employed individuals engaged in EU policy-making and policy implementation and on its future evolution towards a mandatory scheme covering the European Parliament, the Council of the EU and the European Commission.

### QUESTIONNAIRE

Responding as:

The representative of an organisation registered in the [Transparency Register](#)

Please provide your Register ID no:

**20210641335-88**

Name of the organisation:

**Orgalime**

The organisation's head office is in:

**Belgium**

Your organisation belongs to the following type:

**Trade and business associations**

Contact for this public consultation:

**Adrian Harris** [Adrian.harris@orgalime.org](mailto:Adrian.harris@orgalime.org)

### A. GENERAL PART (7 questions)

#### 1. Transparency and the EU

1.1 The EU institutions interact with a wide range of groups and organisations representing specific interests. This is a legitimate and necessary part of the decision-making process to make sure that EU policies reflect the interests of citizens, businesses and other stakeholders. The decision-making process must be transparent to allow for proper scrutiny and to ensure that the Union's institutions are accountable.

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*Orgalime, the European Engineering Industries Association, speaks for 41 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 24 European countries. The industry employs some 10.9 million people in the EU and in 2015 accounted for more than €1,900 billion of annual output. The industry accounts for over a quarter of manufacturing output and a third of the manufactured exports of the European Union.*

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[www.orgalime.org](http://www.orgalime.org)

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a) Do you agree that ethical and transparent lobbying helps policy development?

**X Fully agree**

Partially agree

Disagree

No opinion

b) It is often said that achieving appropriate lobbying regulation is not just about transparency, i.e. shedding light on the way in which lobbyists and policy-makers are operating. Which of the below other principles do you also consider important for achieving a sound framework for relations with interest representatives?

More than one answer possible

**X Integrity**

Equality of access

Other (please elaborate in the comments box below)

No opinion

Comments or suggestions (Optional)

**Make sure that the stakeholders consulted are (1) relevant and (2) representative to the issue**

c) In your opinion, how transparent are the European institutions as public institutions?

They are highly transparent

**X They are relatively transparent**

They are not transparent at all

No opinion

1.2 The Transparency Register provides information to politicians and public officials about those who approach them with a view to influencing the decision-making and policy formulation and implementation process. The Register also allows for public scrutiny; giving citizens and other interest groups the possibility to track the activities and potential influence of lobbyists.

Do you consider the Transparency Register a useful tool for regulating lobbying?

Very useful

**X Somewhat useful**

Not useful at all

No opinion

## 2. Scope of the Register

2.1 Activities covered by the Register include lobbying, interest representation and advocacy. It covers all activities carried out to influence - directly or indirectly - policymaking, policy implementation and decision-making in the European Parliament and the European Commission, no matter where they are carried out or which channel or method of communication is used.

This definition is appropriate:

**X Fully agree**

Partially agree

Disagree

No opinion

2.2 The Register does not apply to certain entities, for example, churches and religious communities, political parties, Member States' government services, third countries' governments, international intergovernmental organisations and their diplomatic missions. Regional public authorities and their representative offices do not have to register but can register if they wish to do so. On the other hand, the Register applies to local, municipal authorities and cities as well as to associations and networks created to represent them.

The scope of the Register should be:

Changed to exclude certain types of entities (please elaborate in the comments box below)

Changed to include certain types of entities (please elaborate in the comments box below)

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**X Preserved the same as currently**

No opinion

**3. Register website**3.1 What is your impression of the Register [website](#)?

Design and structure

Good

Availability of information / documents

Good

Ease of search function

Good Accessibility (e.g. features for visually impaired persons, ease of reading page)

No opinion

Access via mobile devices

No opinion

**Part B includes questions that require a certain knowledge of the Transparency Register.**

**B. SPECIFIC PART (13 questions)****1. Structure of the Register**

1.1 The Register invites organisations to sign up under a particular section, for example, professional consultancies, NGOs, trade associations, etc (Annex I of the [Interinstitutional Agreement](#)).

Have you encountered any difficulties with this categorisation?

Yes

**X No**

No opinion

**2. Data disclosure and quality**

2.1 Entities joining the Register are asked to provide certain information (contact details, goals and remit of the organisation, legislative dossiers followed, fields of interest, membership, financial data, etc) in order to identify the profile, the capacity of the entity and the interest represented (Annex I of the [Interinstitutional Agreement](#)).

The right type of information is required from the registrant:

**X Fully agree**

Too much is asked

Too little is asked

No opinion

Comments or suggestions (Optional)

**It is important to have clarity what / whom the registrant represents and how and by whom it gets financed.**

3000 character(s) maximum

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2.2 It is easy to provide the information required:

**X Fully agree**

Partially agree

Disagree

No opinion

2.3 Do you see any room for simplification as regards the data disclosure requirements?

**X Yes**

No

No opinion

Comments or suggestions (Optional)

**The registrant should be given the possibility to update once per calendar year when it suits the registrant best. At the moment, most registrants have to update several times: at the anniversary of their first registration and then again when their balance sheet, figures and facts are published.**

*3000 character(s) maximum*

2.4 What is your impression of the overall data quality in the Register:

**X Good**

Average

Average

Poor

No opinion

### 3. Code of Conduct and procedure for Alerts and Complaints

3.1 The Code of Conduct sets out the rules for all those who register and establishes the underlying principles for standards of behaviour in all relations with the EU institutions (Annex III of the [Interinstitutional Agreement](#)).

The Code is based on a sound set of rules and principles:

**X Fully agree**

Partially agree

Disagree

No opinion

3.2 Anyone may trigger an alert or make a complaint about possible breaches of the Code of Conduct. Alerts concern factual errors and complaints relate to more serious breaches of behavioural nature (Annex IV of the Interinstitutional Agreement).

a) The present procedure for dealing with alerts and complaints is adequate:

Fully agree

Partially agree

Disagree

**X No opinion**

b) Do you think that the names of organisations that are suspended under the alerts and complaints should be made public?

Yes

No

**X No opinion**

## 4. Register website – registration and updating

4.1 How user-friendly is in your opinion the Register [website](#) in relation to registration and updating?

Registration process  
Straightforward

Updating process  
Satisfactory but can be improved (annual & partial)

Comments or suggestions (Optional)

**The registrant should be given the possibility to update once per calendar year when it suits the registrant best. At the moment, most registrants have to update several times: at the anniversary of their first registration and then again when their balance sheet, figures and facts are published.**

*3000 character(s) maximum*

## 5. Current advantages linked to registration

5.1 The European Parliament and the European Commission currently offer certain practical advantages (incentives) linked to being on the Register. The Commission has also announced its intention to soon amend its rules on Expert groups to link membership to registration.

Which of these advantages are important to you?

In the European Parliament (EP)

### **Access to Parliament buildings:**

long-term access passes to the EP's premises are only issued to individuals representing, or working for registered organisations

**Very important**

### **Committee public hearings:**

guests invited to speak at a hearing need to be registered

**Very important**

**Patronage:** Parliament does not grant its patronage to relevant organisations that are not registered

**Somewhat important**

In the European Commission

**Meetings:** organisations or self-employed individuals engaged in relevant activities must be registered in order to hold meetings with Commissioners, Cabinet members and Directors-General

**Somewhat important**

### **Public consultations:** the

Commission sends automatic alerts to registered entities about consultations in areas of interest indicated by them; it differentiates between registered and non-registered entities when publishing the results

**Very important**

**Patronage:** Commissioners do not grant their patronage to relevant organisations that are not registered

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**Somewhat important**

**Mailing lists:** organisations featuring on any mailing lists set up to alert them about certain Commission activities are asked to register

**Somewhat important**

**Expert groups:** registration in the Transparency Register is required in order for members to be appointed (refers to organisations and individuals appointed to represent a common interest shared by stakeholders in a particular policy area)

**Very important**

Comments or suggestions (Optional)

**It would be useful to have a common EP / EC pass which would serve as a common register and provide access to the EP and for meetings/events to the EC. Filling in one's details when visiting EC buildings on paper is both, antiquated and not environment friendly.**

*3000 character(s) maximum*

**6. Features of a future mandatory system**

6.1 Do you believe that there are further interactions between the EU institutions and interest groups that could be made conditional upon prior registration (e. g. access to MEPs and EU officials, events, premises, or featuring on specific mailing lists)?

Yes

No

**X No opinion**

6.2 Do you agree with the Commission's view that the Council of the EU should participate in the new Interinstitutional Agreement on a mandatory Register?

**X Yes**

No

No opinion

**7. Looking beyond Brussels**

7.1 How does the Transparency Register compare overall to 'lobby registers' at the EU Member State level?

It is better

It is worse

It is neither better, nor worse

**X No opinion**

Publication of your consultation

**X I agree to my contribution being published.**

I do not agree to my contribution being published.



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