

Brussels, 06 February 2024

Dear Ms Cann,

Thank you for your letter of 15 January 2024 to Vice-President Jourová, submitting on behalf of Corporate Europe Observatory a complaint regarding possible influencing activities by European Livestock Voice (ELV) that are ‘unregistered’ in the EU Transparency Register. Vice-President Jourová asked me to reply to your letter on her behalf.

In your letter, you refer to interest representation activities performed by ELV without that campaign being registered in its own name in the Transparency Register. You base your allegations on information provided in recent press articles, on information in the Transparency Register and on the information available on the website of that campaign itself.

As you are aware, the Transparency Register covers the interest representation activities set out in Article 3 of the Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register (‘IIA’) <sup>(1)</sup>. The entity you refer to describes itself as a multi-stakeholder group representing the views of livestock producers at the European level. On its website, it claims to have fourteen members, all of which are actually registered in the Transparency Register.

Registrants are ultimately responsible for the accuracy of the information they have provided in the Transparency Register <sup>(2)</sup>. They are required to observe at all times the rules and principles set out in the register’s code of conduct, which include ensuring that the information that they provide upon registration, and subsequently administer in the framework of their covered activities, is complete, up-to-date, accurate and not misleading <sup>(3)</sup>.

The Transparency Register Secretariat (Secretariat) monitors the ongoing eligibility of registrants, which includes regular quality checks on registrants’ data, aimed at detecting potential inaccuracies, errors or omissions. In the case at hand, the Secretariat is checking the data provided by the ELV members as listed on the ELV [website](#), to ensure that the relationship between the platform and its members is adequately reflected in their registrations.

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<sup>(1)</sup> [EUR-Lex - 32021Q0611\(01\) - EN - EUR-Lex \(europa.eu\)](#)

<sup>(2)</sup> See Article 8(3)(c) of the IIA.

<sup>(3)</sup> Point (f) of the code of conduct set out in Annex I to the IIA.

The Secretariat could also seek to establish whether ELV is performing interest representation activities in its own name, independently of its members and irrespective of its legal form. If this is the case, then the Secretariat could invite ELV to register in the Transparency Register in order that a more complete picture is provided, and transparency is better served.

Insofar as the Commission is concerned, only registered interest representatives can meet Commission decision-makers: this applies to all Members of the Commission, the members of their Cabinet as well as to all Directors-General and Heads of Service of the Commission. The Commission publishes information on all such meetings in accordance with the applicable Commission rules. Information on the meeting that took place between the Commission Vice-President Timmermans and organisations participating in the ELV campaign on 31 March 2021, to which you refer in your letter, was duly published at the time in accordance with such rules.

The Secretariat will inform you of the outcome of its monitoring procedures, as a follow up to your letter.

Yours sincerely,

María Oliván Avilés