



EUROPEAN COMMISSION
SECRETARIAT-GENERAL

Directorate C - Transparency, Efficiency & Resources
SG.C.1 - Transparency, Document Management & Access to Documents

Brussels
SG.C.1

Dear Ms Cann,

Thank you for your letter of 25 January 2024 to Vice-President Jourová, submitting a complaint on behalf of Corporate Europe Observatory regarding possible influencing activities performed by The Alliance for Sustainable Management of Chemical Risk (ASMoR) that are 'unregistered' in the EU Transparency Register. Vice-President Jourová has asked me to reply on her behalf.

In your letter, you refer to interest representation activities performed by ASMoR without it being registered in the Transparency Register under its own name. You base your allegations on information from recent press articles, in the Transparency Register and on the website of the organisation concerned.

As you are aware, the Transparency Register covers those 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') ⁽¹⁾. The entity you refer to describes itself as an alliance of more than 30 members that develop common positions on the future of EU Chemicals Risk Management. For your information, all of its members are currently registered in the Transparency Register, save one.

Registrants are ultimately responsible for the accuracy of the information they have provided in the Transparency Register ⁽²⁾. They are also required to observe the rules and principles set out in the register's code of conduct, which includes 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 ⁽³⁾.

The Transparency Register Secretariat (Secretariat) monitors the ongoing eligibility of registrants, which includes performing regular quality checks on registrants' data, aimed at detecting potential inaccuracies, errors or omissions. In the case at hand, the Secretariat has checked ASMoR members' registrations to ensure that the relationship between the platform and its members is adequately reflected in those registrations.

The Secretariat has also assessed whether ASMoR can be considered to engage in interest representation activities in its own name, independently of its members and irrespective of its legal form. Following this assessment and to ensure that full transparency is provided,

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

⁽²⁾ See Article 8(3)(c) of the IIA.

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

the Secretariat invited ASMoR to register in the Transparency Register, which it recently did ⁽⁴⁾.

As a further step, the Secretariat is looking into the relationship between Hanover Communications and ASMoR to ensure the availability of transparent information in the registrations concerned, as applicable.

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 on the Europa website, in accordance with the applicable Commission rules.

For all other staff, it is recommended that they check the credentials of a given interest representative to make sure that they are in the Transparency Register. If they are not in the register, staff should always invite them to register before having further contacts.

The Secretariat has also informed you of the outcome of its monitoring procedures in this context.

Yours sincerely,

María OLIVÁN AVILÉS
Head of Unit

⁽⁴⁾ Alliance for Sustainable Management of Chemical Risk TR ID 181667792087-61