



EUROPEAN COMMISSION  
SECRETARIAT-GENERAL

The Secretary-General

Brussels  
SG.C.1

Dear representatives of

Corporate Europe Observatory (CEO),  
Transparency International EU,  
LobbyControl  
The Good Lobby,

I am writing in reply to your joint letter of 30 April 2024 in which you have outlined your concerns about the transparency of certain events of the European equine industry attended by the President of the European Commission, as described in an article published by Politico on 23 March 2024. In particular, your letter refers to the speeches addressed by President von der Leyen on two occasions during her mandate, at events held by the European Horse Network (EHN) in conjunction with the MEP Horse Group.

In your letter, you claim that those events were meetings with lobbyists that ‘appear neither on the President’s public calendar nor on her log of meetings with interest representatives’.

As can be seen from the public links that you enclose, on 16 November 2021, the President addressed a speech to the European horse community in a conference organised by EHN and the MEP Horse Group, led by a Member of the European Parliament. On 8 June 2023, the President participated in a similar event organised by the MEP Horse Group in the European Parliament.

I would like to clarify that, under the applicable Commission rules, a ‘meeting’ (with an interest representative) refers to a ‘bilateral encounter [...] to discuss an issue related to policymaking and implementation in the Union’ <sup>(1)</sup>. In this respect, I can confirm that the above occurrences cannot be considered to be lobby ‘meetings’ within the above meaning.

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<sup>(1)</sup> See point (a) of Article 2 of Commission Decision 2014/839/EU, Euratom of 25 November 2014 on the publication of information on meetings held between Members of the Commission and organisations or self-employed individuals ([OJ L 343, 28.11.2014, p. 22](#)).

Corporate Europe Observatory (CEO)  
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In fact, the MEP Horse Group is an unofficial grouping made up of individual Members of the European Parliament, governed by Rule 35a of the European Parliament Rules of Procedure. As is known, meetings with representatives of other EU institutions are not covered by Commission rules on the publication of information on meetings held with interest representatives. EHN on the other hand, as a network of stakeholders representing the interests of the equine industry, has been requested to register in the Transparency Register insofar as it carries out activities covered by 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 <sup>(2)</sup>, and is now registered in the Transparency Register <sup>(3)</sup>.

I would like to recall that the participation of Members of the Commission in public events must be distinguished from ‘meetings’ with interest representatives that require the publication of information thereon <sup>(4)</sup> and the prior registration of the interest representative concerned in the Transparency Register.

I would also like to highlight that there is no requirement under Commission rules for the President or other Members of the Commission to publish information on all the speeches they make or on all the events, or meetings, they attend in their public calendars. At the same time, in its pursuit of leading by example on transparency, the Commission does indeed publish information on such occurrences in an extensive manner.

Consequently, I fail to see any issue of compliance with Commission rules.

As regards your suggestion to appoint ‘an ethics guardian who can assist the President’, I would like to inform you that each Member of the Commission can rely on a person within their Cabinet acting as contact point for ethics and transparency issues. Members and their Cabinets can also rely on the support and advice from the Secretariat-General as regards ethical obligations of Members of the Commission and transparency-related issues, and from the Directorate-General for Human Resources, as regards the ethical rules for Commission staff.

Yours faithfully,

Ilze JUHANSONE

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<sup>(2)</sup> [OJ L207, 11.6.2021, p. 1.](#)

<sup>(3)</sup> [organisation detail - European Union \(europa.eu\)](#)

<sup>(4)</sup> See recital (6) of Commission Decision 2014/839/EU, Euratom, referenced above.