

Brussels, July 9th 2024

Dear Secretary-General Ilze Juhansone,

thank you for your June 10th response (Ares(2024)4155377) to our letter about Commission President von der Leyen's interactions with equine industry lobbyists (MEP Horse Group / European Horse Network). We would like to highlight a number of problems with arguments made in the letter and make suggestions for measures to be taken to secure reliable lobby transparency in the future.

Firstly, you argue that President von der Leyen's participation in the European Horse Network events aren't meetings with lobbyists. You refer to the Commission's 2014 definition of what is a lobby meeting: "a 'meeting' (with an interest representative) refers to a 'bilateral encounter [...] to discuss an issue related to policymaking and implementation in the Union'". We would argue that this definition very clearly means that these events should be considered lobby meetings. The European Horse Network is an interest representative, and policymaking and implementation was discussed during the encounters. As Politico writes, referring to [EHN's writeup of the June 8 2023 meeting with President von der Leyen](#), "industry pros vented their concerns to von der Leyen about the upcoming review of the bloc's animal welfare legislation. The Commission President sought to "reaffirm" her support, as EHN put it, and assured that their "needs will be taken into account" in the eventual legislative proposal." This was very clearly a lobby meeting according to the Commission's own definition.

We remind of Article 1 of the Commission decision of 25 November 2014: "The Members of the Commission shall make public information on all meetings held by them and members of their Cabinet with organisations or self-employed individuals on issues relating to policy-making and implementation in the Union"

Secondly, you argue that the MEP Horse Group is a representative of the European Parliament so it doesn't count as a meeting to be disclosed in the President's lists of lobby meetings or in her agenda. This is not correct. According to [the rules of the Parliament](#), officially recognised Intergroups (let alone unofficial groups like the MEP Horse Group) are "not organs of Parliament and may not, therefore, express the opinion thereof". The rules state that "intergroups may not undertake any activities which might result in confusion with the official activities of Parliament or of its bodies." As the MEP Horse Group is not even a recognised Intergroup, it can clearly not be considered to be a representative of the European Parliament. The fact that MEPs were involved in hosting the event should not be an excuse for avoiding transparency around encounters with lobbyists.

Thirdly, your letter states that the EHN had been asked to join the Transparency Register and now is in the register. This ignores the essential fact that they weren't registered at the time of the President's meetings with them.

The fact remains that President von der Leyen repeatedly spoke at events hosted by a lobby group that wasn't registered and which had ignored requests to from the Transparency Register secretariat to join the register. The President thereby gave lobbyists the signal that lobby transparency is unimportant and entirely optional. As the European Commission considers the Transparency Register to be mandatory, the President's participation in these events was a very unfortunate oversight.

Your letter creates serious uncertainty about what is disclosed in the President's lobby meetings list and calendar. Based on this response, neither of those lists can be trusted as an accurate reflection of the President's interactions with lobbyists. This undermines the credibility of the Commission's transparency system.

Based on this assessment, we propose that the Commission as part of its lobby regulation program for the 2024-2029 term introduces guidelines to:

- ensure that Commissioners and Commission staff will never have meetings with unregistered lobbyists
- clarify that MEP-industry groups are considered vehicles for lobbying and do not represent the European Parliament
- ensure that the lists of lobby meetings as well as the calendars of European Commissioners provide a complete overview of meetings with third parties

We look forward to your reply.

Yours sincerely,

Corporate Europe Observatory (CEO)
Transparency International EU
LobbyControl