



**Joint Transparency Register  
Secretariat**



Brussels,

Ms Margarida Silva  
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Sent only by e-mail to:  
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Ref.: TR-A-2018-72

**Subject: Closure of the alert procedure regarding the non-registered activities of the entity Titanium Dioxide Manufacturers Association (TDMA), a sector group of CEFIC (European Chemical Industry Council)**

Dear Ms Silva,

The Joint Transparency Register Secretariat (JTRS) refers to your alert TR-A-2018-72, which you submitted on behalf of Corporate Europe Observatory (CEO) on 10 July 2018 concerning the entities Titanium Dioxide Manufacturers Association (TDMA) and Venator.

As you were informed on 1 August 2018, in order to follow up to your alert, the Joint Transparency Register Secretariat has been in contact with CEFIC (TR ID: 64879142323-90), of which TDMA is a sector group, in order to receive additional clarifications with regard to the activities and status of this organisation.

It has emerged that as a sector group of CEFIC, TDMA does not have its own legal personality<sup>1</sup>. All legal references on the TDMA website point to the legal personality of CEFIC, which is officially registered in Brussels, as stipulated in the Moniteur Belge, with the registration number 0412849915.<sup>2</sup> In fact, TDMA is one of up to 70 sector groups of CEFIC, none of which are currently registered in the Transparency Register directly.

<sup>1</sup> <https://specialty-chemicals.eu/tdma/>

<sup>2</sup> <http://www.ejustice.just.fgov.be/tsv/tsvf.htm>

Therefore, while the JTRS cannot require that TDMA itself register in the Transparency Register, it has taken note of your concerns for more transparency regarding the activities of the sector groups of CEFIC. This is why, in its contacts with CEFIC, the JTRS has sought to identify possible areas of improvement in its declaration.

As a follow up to the alert, CEFIC has already taken the following measures to increase the transparency of its activities:

- CEFIC now includes the activities of CEFIC's sector groups in its registration in the Transparency Register;
- CEFIC's registration now provides a hyperlink to a full list of its sector groups (ca. 70) in its registration;
- CEFIC has given instructions to the staff of its sector groups to clearly identify themselves as such, when acting as representatives of CEFIC sector groups with the objective of directly or indirectly influencing the formulation or implementation of policy and the decision-making processes of the EU institutions.

In the context of this alert, the consultancy Fleishman-Hillard has also corrected its registration and no longer provides separate account statements for CEFIC and its sector groups.

Furthermore, the JTRS finds that while it may be neither warranted nor practical for CEFIC to oblige approximately 600 members to individually register in the Transparency Register, the JTRS has encouraged CEFIC to invite its members to register those activities that the latter perform in their own name and outside of CEFIC's activities.

In this spirit the JTRS has also invited the entity Venator, which is a member of CEFIC, to register those activities in the Transparency Register falling outside the activities of the umbrella organisation and which are in the scope of the Interinstitutional Agreement on the Transparency Register.<sup>3</sup>

The JTRS finds the above implemented measures to be a sufficient and adequate response with regard to the case at hand, and fully in line with the guidelines for registrants. It has therefore decided to close the alert procedure.

Yours sincerely,



María Oliván-Avilés  
Coordinator of the Joint Transparency Register  
Secretariat

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<sup>3</sup> [https://eur-lex.europa.eu/legal-content/en/TXT/?uri=uriserv:OJ.L\\_.2014.277.01.0011.01.ENG](https://eur-lex.europa.eu/legal-content/en/TXT/?uri=uriserv:OJ.L_.2014.277.01.0011.01.ENG)