

**Lobby transparency register complaint by Corporate Europe Observatory  
15 November 2017**

**European Policy Information Center**

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=080362721653-38>

**a) always identify themselves by name and, by registration number, if applicable, and by the entity or entities they work for or represent; declare the interests, objectives or aims they promote and, where applicable, specify the clients or members whom they represent;**

**(d) ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading; accept that all information provided is subject to review and agree to cooperate with administrative requests for complementary information and updates;**

We have a major concern about the European Policy Information Center's (EPICENTER) entry in the Transparency Register in that it does not declare any financial information, which it justifies by saying it is a 'Newly formed entity, no financial year closed'.

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We think this is a breach of article D of the Code of Conduct as on its own website it states that "EPICENTER was launched in October of 2014".

<http://www.epicenternetwork.eu/about-2/> It joined the register in May 2016.

Since 2014, EPICENTER says it has been "active in the European policy debate, providing a free-market perspective on topics including the digital economy, trade policy, energy security and competition, financial regulation, free movement and welfare, and public health."

Many of these events have included Members of the European Parliament, for instance its event in September 2017 hosted by MEP Christopher Fjølner inside the European Parliament, or of the Commission. In the description of its latest conference Innov8, it says: "We regularly host high-profile events in Brussels and previous speakers have included European Commission Vice-President Jyrki Katainen and Gunnar Hökmark MEP." The EPICENTER has also just announced this year's Inno8 conference and the line up of speakers so far include four current MEPs and a Commission official, Bjoern Juretzki, Assistant to the Director, DG CONNECT of the European Commission.

<http://www.epicenternetwork.eu/events/>

<http://innov8europe.eu/speakers-2-2/>

EPICENTER joined the EU lobby register in May 2016 and has performed at least one annual update since then. It declares 2.75 FTE lobbyists right now; when it first registered, it declared 3 FTEs. If those staff are paid for their EPICENTER work, that should be declared as part of EPICENTER's financial declaration (even if the funding comes from a third party). We are therefore surprised that the register's secretariat has not picked up upon the fact that it continues to declare no lobby budget as if it were a "newly formed entity". The guidelines say that "You must provide the financial data requested at the time of your next annual update unless any of the above exceptions applies. The appropriate exception must be

specified in the text box provided.” At the time of writing, no financial data is provided by EPICENTER, nor any adequate explanation as to its absence. We further note that there is no information in the register or on EPICENTER’s website about the organisation’s overall budget, nor how it is funded.

A further concern about EPICENTER relates to article A of the Code of Conduct. We note that EPICENTER's "key people" are all staff members of the Institute of Economic Affairs, which includes all EPICENTER’s lobbyists with EP badges, namely:

- Ms Christiana Elizabeth Stewart-Lockhart – Director of Programmes at the IEA
- Mr Adam Bartha – Programmes Assistant at the IEA
- Mr Diego Zuluaga Laguna – Head of Financial Services and Tech Policy at the IEA

It is our view that EPICENTER’s declaration should fully reflect the fact that all EPICENTER’s listed personnel are actually staff of the IEA.

The IEA is not registered in the EU Transparency Register and it is necessary to question whether the IEA is using EPICENTER to avoid registering in its own right. Please see our separate alert on this matter.

Was any harm caused to the complainant?: No

Was the non-compliance intentional?: I don't know. It is hard to assess intention, but it is rather remarkable that EPICENTER has not provided any financial information whatsoever. Furthermore, the overlap of EPICENTER lobbyists and IEA staff raises questions for both IEA and EPICENTER.