

Subject: Re: Fwd: CEPS ' entry in the Transparency Register
From: [REDACTED]@ceps.eu>
Date: 06/05/16 11:06
To: Marijke <marijke@corporateeurope.org>

Dear Marijke,
yes, sorry, I had meant to include a specific reference to that question, which is only partially addressed in the last paragraph of my email.

The reason why my answer was not clear stems from the rigidity in the categories (and electronic form) of the register.

Again, given that we do not engage in interest representation, my answer would be that none of our fifty-something employees is paid for directly or indirectly lobbying the EU Institutions (or any other institution, for that matters). Thus, we incur no costs for lobbying activities, which we do not carry out.

Heading 10 of the Transparency Register refers to the number of persons involved "in the activities described under heading 9" of the same register.

Under Heading 9, you can see that we have filled the information concerning "*Main EU initiatives, policies and legislative files currently followed by your organisation:*" and "*Relevant policy implementation, public relations and communication activities such as projects, events and publications:*".

This is because we do follow, for research purposes, various legislative dossiers and EU initiatives. That means that at any given time my colleagues will now at which stage the proposals for e.g. a European Unemployment Insurance, or the Circular Economy, are. They will also have read the various communications, green papers, draft directives pertaining to them, and at times they will have attended the relevant EP committee meetings (although this is becoming more and more rare due to time constraints).

As to the second point of Heading 9, I outlined in my previous email that indeed, we do organise several events, run many research projects, and publish hundreds of papers every year.

These are the activities "Under Heading 9" that we regularly conduct. On the other hand, you will have noticed that we have replied negatively to the remaining points, concerning the participation in High-level groups (European Commission); Consultative committees; Expert groups (European Commission); Intergroups (European Parliament); Industry forums (European Parliament). As of today, none of our employees are taking part in any of these activities.

Finally, approximately 45 of our employees are researchers. The rest of our staff consists of support/administrative personnel (IT, accounting, etc). This includes myself and the members of the CEPS management, who, on top of conducting research, also engage in external relations for CEPS, with a view to promoting our activities. Within this framework, they/we are the ones who from time to time access the European Parliament, and have meetings with Commission officials.

Hope this helps,
Best regards,

[REDACTED]

[REDACTED]

[REDACTED]

On 4 May 2016 at 15:35, Marijke <marijke@corporateeurope.org> wrote:

Dear [REDACTED],

Thank you very much for your reply and clarifications.

Allow me to come back to one question.

In my e-mail, I also referred to the fact that in the Register CEPS declares 50 full time equivalent persons involved in activities covered by the register. As in the section on financial data, "estimate of the annual costs related to activities covered by the register" is asked, we fail to see how the salary of these 50 full time equivalents would be paid with less than €9,999.

I was hoping you could provide me with an answer to this question.

Thank you very much in advance.

Kind regards,

Marijke

On 04/05/16 14:09, [REDACTED] wrote:

Dear Mrs Vermander,
many thanks for your query and interest.

To answer your question, let me start with a couple of clarifications: CEPS is an European think tank, incorporated as a not-for-profit International Association under Belgian law.

Our mission is to carry out policy research leading to solutions for the challenges facing Europe. As you can read on our website, too, our aim is to promote better EU policy-making, rather than representing the interests of any third organisation, no matter if public or private. Being independent from any influence, whether it comes from private or public organisations, is what is key to our work.

For this reason, we successfully argued with Vice-President Kallas first, and Vice-President Sefcovic later, that the name of the register should be changed from "Register of Interest Representatives" to "Transparency Register", and that a specific sub-category "Think Tanks" should be introduced. Only once these two fundamental changes were affected did we sign up to the register.

The meetings with Commission officials that you refer to in your email have all happened within this framework: Either to carry out interviews to complement our theoretical research, or to discuss (in public debates) the main findings of our studies. We organise a range of meetings in which public officials, company representatives (across sectors, and countries), and other stakeholders meet and debate. Neither of these activities is designed to influence, directly or indirectly, policy-making by putting forward a specific interest - which is what lobbying implies.

A think tank has the role of putting on the table constructive, well-thought-through, and well-argued new ideas. Since we are one of several think tanks active in Brussels, these proposals may or may not be taken into account by EU policy-makers. They are meant to stimulate effective policy making, and to "thinking ahead for Europe" as outlined in our motto.

As to the access to European institutions: We have a team working on external relations that supports researchers in getting their work promoted. They engage with members of the EP and the EC, also in preparation for our events, and thus we do have access passes (used to very different extents). This is why we indicate less than €9.999 as the

costs related to activities of interest representation. If a box with the amount €0 was available, we would have ticked that box.

I hope this answer clarifies matters, but please do not hesitate to contact me for any further inquiry,

Best regards,

[REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: **Marijke** <marijke@corporateeurope.org>

Date: 2 May 2016 at 12:53

Subject: CEPS ' entry in the Transparency Register

To: [REDACTED]@ceps.eu

Dear Sir or Madam,

I am currently working on an article on think tanks.

I was looking into several entries in the EU Transparency Register and I noticed that your institution has indicated to estimate its costs related to activities covered by the register for the year 2014 to be less than €9,999.

We see that CEPS has had at least 20 meetings with commission officials since December 2014 and in the Register entry you indicated 50 Full Time Equivalent persons within your institution are involved in the activities covered by the Register. Also 4 persons of your organization have access to EP premises.

On your website, one can read two of CEPS' goals are "to provide a forum for discussion among all stakeholders in the European policy process" and "to build collaborative networks of researchers, policy-makers and business representatives across the whole of Europe."

Activities covered by the Register, as can be read [here](#), include "lobbying, interest representation and advocacy. It covers **all** activities designed to influence - **directly or indirectly** - policymaking, policy implementation and decision-making in the EU institutions (...)".

Judging from the statement on your website and other indications, your

activities seem to fall under this definition.

In the Register's [Guidelines](#) it is stated that costs attributable to activities covered by the Register cover direct and indirect lobbying. To calculate your total costs you would typically add up the following elements: staff costs, office and administrative expenses, in-house operational expenditure, representation costs, outsourced activity costs, membership and related fees and other relevant costs.

So we were wondering if could you explain why your institution declares its annual costs related to activities covered by the register to be below €9,999?

I kindly ask you to provide us with an answer by the end of this week, as the article's drafting phase is coming to an end.

Thank you very much in advance.

Kind regards,

Marijke Vermander
Corporate Europe Observatory