

Subject: RE: Friends of Europe's entry in the Transparency Register

From: [REDACTED]@friendsofeurope.org>

Date: 29/04/16 14:58

To: Marijke <marijke@corporateeurope.org>

CC: [REDACTED]@friendsofeurope.org>

Dear Ms Vermander,

There indeed seems to be an ambiguity because of the broad definition of the scope of the Transparency register which covers "all activities designed to influence - directly or indirectly - policymaking, policy implementation and decision-making in the EU institutions". This means that in a large interpretation virtually all of Friends of Europe's activities and budget may be said to fall under the Transparency register.

However, it should be stressed that the objective of Friends of Europe's activities is to foster discussion and debate among the EU's leaders and citizens on the issues that shape their future and to debate and circulate useful ideas to a more forward-looking, inclusive and sustainable Europe, NOT to push any specific political or business interest. Friends of Europe therefore does not have or use any funds for lobbying for a specific business or political cause and we therefore have always put zero costs attributable to lobby activities.

This ambiguity on the scope of the register which covers activities with direct and indirect influence therefore seems to have led to different interpretations among think tanks as seen in the transparency register and the way think tanks report on their budget allocated to these activities. Given the specificity of a think tank's independent work, we have asked the European Commission to examine whether a distinction can be made in the register between direct lobbying budgets (zero for Friends of Europe) and activities that can indirectly influence EU policymaking such as the work of think tanks in which case we would probably put our entire budget, as we don't know how we could distinguish costs for accounting, IT, etc from costs linked to organising debates or publishing reports.

Kind regards,

[REDACTED]

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Friends of Europe is a leading think-tank that aims to stimulate new thinking on global and European issues that span political, economic, social and environmental challenges.



From: Marijke [<mailto:marijke@corporateeurope.org>]
Sent: vendredi 22 avril 2016 15:14
To: Info (Friends of Europe)
Subject: Friends of Europe's entry in the Transparency Register

Dear Sir or Madam,

I am currently working on an article on think tanks.

I took a look at Friends of Europe's entry in the EU Transparency Register. 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 Friends of Europe has had at least 10 meetings with commission officials since March 2015 and in the Register entry you have indicated 27,5 Full Time Equivalent persons within your institution are involved in the activities covered by the Register.

On your website, one can read the following: "Friends of Europe – Les Amis de l'Europe is a leading think-tank that aims to stimulate thinking on key global and European issues that span political, economic, social and environmental challenges. Our insightful and timely publications and animated debates provide access to sharp analysis and they often produce bold recommendations. We promote the confrontation of ideas that is vital to policymaking and encourage wider involvement in Europe's future."

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 within one week, as the article's drafting phase is coming to an end.

Thank you very much in advance.

Kind regards,

RE: Friends of Europe's entry in the Transparenc...

Marijke Vermander
Corporate Europe Observatory