

# AmCham EU's response to the Transparency Register Consultation

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American Chamber of Commerce to the European Union  
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CONSULTATION RESPONSE

## Transparency Register

Information about the contributor to the consultation	
Is your organisation registered with the Transparency Register? -single choice reply- (compulsory)	Yes
Name or organisation name as it appears in the Register: -open reply-(compulsory)	American Chamber of Commerce to the European Union
Please enter your e-mail address. -open reply- (compulsory)	emanuele.degortes@amchameu.eu
What is your Transparency Register identification number? -open reply-(compulsory)	5265780509-97
To what section does your organisation belong? -single choice reply-(compulsory)	In-house lobbyists and trade/professional associations
Please specify: -single choice reply-(compulsory)	Professional associations
In what country does your organisation have its head office? -single choice reply-(compulsory)	Belgium
Does your organisation have an office in Brussels? -single choice reply-(compulsory)	Yes
QUESTIONNAIRE FOR THOSE REGISTERED IN THE TRANSPARENCY REGISTER	
WHY DID YOUR ORGANISATION REGISTER IN THE TRANSPARENCY REGISTER?(select as many as apply) -multiple choice reply-(compulsory)	We wish to be open/public about our participation in the EU decision-making process. - We wish to conduct our activities in a transparent, ethical manner. - In order to be eligible for badges offering long-term access to the European Parliament's buildings.
I BELONG TO A NETWORK THAT ENCOURAGED ITS MEMBERS TO REGISTER. -single choice reply-(compulsory)	No
HAVE YOU YOURSELF ENCOURAGED OTHER ORGANISATIONS TO REGISTER WITH THE TRANSPARENCY REGISTER? -single choice reply-(compulsory)	Yes
If yes, why? -open reply-(compulsory)	Because we believe that the Joint Transparency Register can be an instrument to provide transparency and to ensure interest representation is done with integrity.
DO YOU THINK THAT APPEARING IN THE REGISTER REFLECTS POSITIVELY ON YOUR ORGANISATION? -single choice reply-(compulsory)	Yes
IS THE INFORMATION ON THE WEBSITE ABOUT HOW TO REGISTER CLEAR ENOUGH?	No

-single choice reply-(compulsory)	
If no, please explain: -open reply-(compulsory)	
We understand that the project is still a work in progress; however, many of our members are still uncertain as to how to fill in some of the information required. We welcomed the clarification on the section related to procurement and grants. However, the calculation method for the cost estimate and the link between the people having access rights to the European Parliament and the percentage of their salary which needs to be declared remain unclear.	
Homepage -single choice reply-(compulsory)	Clear
Official documents -single choice reply-(compulsory)	Not clear
Registration form -single choice reply-(compulsory)	Clear
Updating information for your organisation -single choice reply-(compulsory)	Clear
Request form for European Parliament accreditation -single choice reply-(compulsory)	Not clear
Documentation to help you register -single choice reply-(compulsory)	Not clear
Consultation of the list of registered organisations -single choice reply-(compulsory)	Clear
Search form -single choice reply-(compulsory)	Clear
Statistics -single choice reply-(compulsory)	Not very clear
How could we improve the official documents? -open reply-(compulsory)	Currently, this section contains only two documents. It would be more user-friendly to add the other documents available on the site to it (code of conduct, guidelines, rules of procedures).
How could we improve the request form for European Parliament accreditation? -open reply-(compulsory)	There should be more coordination between the very useful Transparency Register staff and the EP accreditation centre and the accreditation centre should set up a helpdesk.
How could we improve the documentation to help you register? -open reply-(compulsory)	With the new guidelines, filling in the Transparency Register has become clearer. More guidance in the Financial Data section would be welcome.
Guidelines -single choice reply-(compulsory)	Not clear
Frequently asked questions -single choice reply-(compulsory)	Clear
Registration form -single choice reply-(compulsory)	Clear
Code of conduct -single choice reply-(compulsory)	Not clear
Complaint mechanism and sanctions -single choice reply-(compulsory)	Not clear
Are there other documents that would be helpful when signing up for the Transparency Register? -open reply-(optional)	

WHEN YOU REGISTERED, DID YOU HAVE ANY DIFFICULTY FILLING OUT THE FOLLOWING FIELDS? -multiple choices reply-(optional)	Number of persons engaged in activities falling under the scope of the Transparency Register - Financial data
If yes, please explain: -open reply-(compulsory)	
Some members found it difficult to discern who falls within the scope of the Register. We struggle to understand how to calculate the salary proportion of staff with accreditation rights that should be declared. This decision should be left to the registrant who knows how much time their employees spend on activities that fall under the Register. The same goes for employees with no accreditation, whose occupation isn't related to EU Affairs but who have occasional meetings with EU officials.	
If yes, please explain: -single choice reply-(compulsory)	Category II - Estimated costs related to representing interests
HAVE YOU CONTACTED THE HELPDESK (BY TELEPHONE OR E-MAIL)? -single choice reply-(compulsory)	Yes
If yes, were you satisfied with the help provided? -single choice reply-(compulsory)	Yes
HAVE YOU ENTERED ONE OR MORE REQUESTS FOR EUROPEAN PARLIAMENT ACCREDITATION? -single choice reply-(compulsory)	Yes
If yes, did you use the online form? -single choice reply-(compulsory)	Yes
If yes, were you satisfied with the way your request was handled? -single choice reply-(compulsory)	No
If no, please explain: -open reply-(compulsory)	When the online form was introduced we had already submitted hard copy requests. These were rejected with an explanation that was untrue. The transition to the online form could have been smoother
"How to request European Parliament accreditation" -single choice reply-(compulsory)	Not clear
Request form for European Parliament accreditation -single choice reply-(compulsory)	Clear
How could we more clearly explain the procedure for requesting European Parliament accreditation? -open reply-(optional)	The procedure, now that the online accreditation form is available and our staff is not required to submit a "certificate of good conduct", works very well.
WHAT ADDITIONAL BENEFITS/PRACTICAL CONSEQUENCES WOULD YOU LIKE TO GAIN FROM SIGNING UP FOR THE TRANSPARENCY REGISTER? (vis-à-vis the European Commission and/or European Parliament)? -open reply-(optional)	Given that the Register is now a Joint One we would like the access rights to be extended to the Commission.
WOULD YOU LIKE TO SEE REGISTRANTS OBLIGED TO DISCLOSE MORE INFORMATION THAN THEY DO CURRENTLY? -single choice reply-(compulsory)	No
DO YOU HAVE ANY OTHER COMMENTS? -open reply-(optional)	

Interest representation is valued as a constructive and meaningful contribution to EU decision making. The Joint Transparency Register can be an instrument to provide transparency and to ensure interest representation is done with integrity. We sincerely hope that the Joint Register will form the basis of a credible yet workable system for all EU actors. With this in mind we hope that the Commission will re-evaluate its decision, as stated in the updated guidelines, to force all associations to report 100% of the salary of its employees who have requested access rights. AmCham EU feels that, even though an employee has asked for access rights this does not mean that he spends 100% of its time in activities that fall within the scope of the register.

## CONFIDENTIALITY

The contributions received and the identity of the contributor will be published on the Internet, unless the contributor is opposed to the publication of personal data for fear that this would damage his/her legitimate interests, in which case the contribution may be published in anonymous form.

Do you authorise the European Commission to publish your contribution? -single choice reply-  
(compulsory)

Yes