

Danuta Hübner
Member of the European Parliament
European Parliament
60, rue Wiertz
1047 Brussels

Brussels, 5 December 2018

Dear Mrs Hübner,

The American Chamber of Commerce to the European Union (AmCham EU) stands for an open and transparent European dialogue and policy-making process and is a long-standing supporter of EU efforts to enhance transparency. It is committed to assisting and providing quality input to ensure more transparency and legal certainty in relations between stakeholders and all European bodies. Indeed, interest representation constitutes a vital element of a healthy EU decision-making process, where policy-makers depend on input from experts in order to deliver effective regulation.

We write ahead of the European Parliament Committee on Constitutional Affairs (AFCO) vote on 6 December 2018 supporting the amendments to the report on the Revision of the Rules of Procedure. The first amendment states that Rapporteurs, Shadow Rapporteurs and Chairs shall only meet registered representatives, and the second calls for these meetings to be published online. AmCham EU believes these amendments could go a long way in increasing the transparency of the EU policy-making process. In addition, they become crucial considering they could be make or break for the Inter-Institutional negotiations on transparency reforms.


AmCham EU believes transparency and ethical behaviour benefit policy development, as they ensure proper scrutiny from stakeholders and accountability of the EU institutions building an environment of trust. AmCham EU has always strived to work to the highest standards of integrity and transparency in its relations with the EU institutions. The Transparency Register is an important tool for regulating lobbying and we think the Commission's ambition to propose an Inter-Institutional Agreement on a mandatory Transparency Register including all three EU institutions is a great step forward, and would be a missed opportunity if an agreement would be delayed to the next legislature.

AmCham EU believes a reformed Transparency Register should:

- Apply across the board with a **'one-stop shop' approach**, resulting in reduced administrative burden for registrants and less risk of confusion and duplication of rules;
- Offer a **simpler and clearer set of guidelines** to allow for better compliance as the Register currently suffers from disparity in the disclosure of information; and
- Provide **better communication and explanation** on what the Register constitutes in order to avoid misinterpretation of the information declared.

We look forward to a continued dialogue on this important issue and remain at your disposal for any questions.

Yours sincerely,



Susan Danger
CEO
AmCham EU