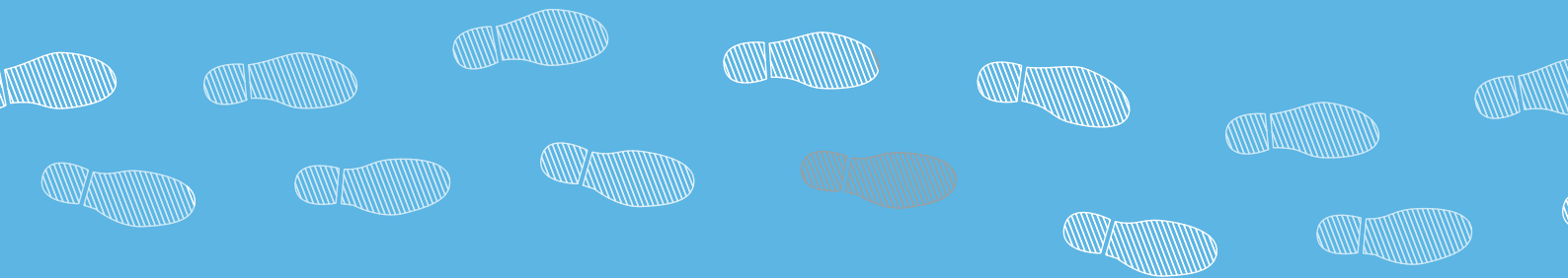




**TRANSPARENCY  
INTERNATIONAL**  
the global coalition against corruption

**EU OFFICE**



# EU LEGISLATIVE FOOTPRINT

What's the real influence of lobbying?

# TABLE OF CONTENTS

Transparency International EU (TI-EU) is the Brussels office of the global non-governmental organisation leading the fight against corruption. The mission of TI-EU is to prevent corruption and promote integrity, transparency and accountability in EU institutions, policies and legislation. The TI-EU Office was established in 2008 and is registered in the EU's Transparency Register under: 5012229191-71.

**Authors:**

Dr. Janina Berg, Senior EU Policy & Legal Officer and Daniel Freund, Policy Officer.

**Funding:**

This publication is part of a series published in the framework of TI's pan-European project on 'Lifting the Lid on Lobbying' conducted in 19 EU member states. This publication reflects the views only of the author, and none of the donors below can be held responsible for any use which may be made of the information contained therein.



With the financial support of the Prevention of and Fight against Crime Programme of the European Union

European Commission – Directorate General Home Affairs



Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of March 2015. Nevertheless, TI-EU cannot accept responsibility for the consequences of its use for other purposes or in other contexts.

Printed on 100% recycled paper.

© 2015 TI-EU Office (AISBL). All rights reserved.

## EU LEGISLATIVE FOOTPRINT

What's the real influence of lobbying?

4

## THE ISSUE

Preventing undue influence and restoring trust

5

## THE SOLUTION

Institute an EU legislative footprint

6

## RECOMMENDATIONS

An effective EU legislative footprint

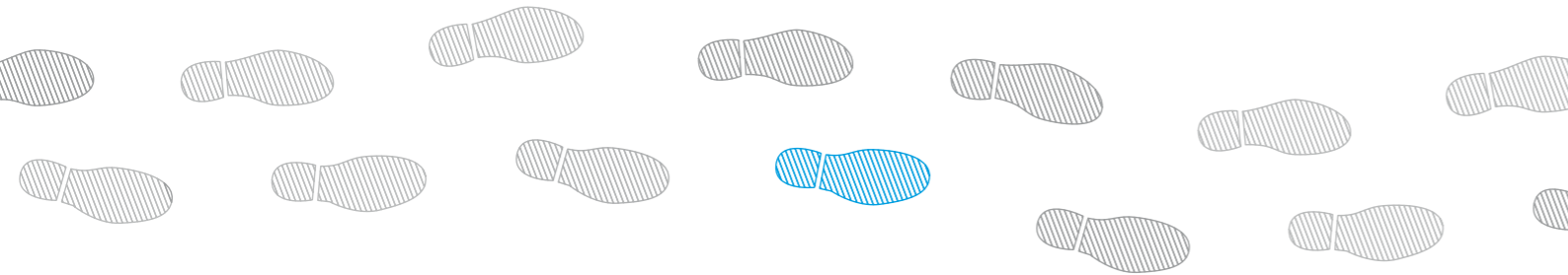
9

## FREQUENTLY ASKED QUESTIONS

12

# EU LEGISLATIVE FOOTPRINT

## WHAT'S THE REAL INFLUENCE OF LOBBYING?



### DEFINITION: Legislative Footprint

A legislative footprint is a comprehensive public record of lobbyists' influence on a piece of legislation.

The increasing use of a legislative footprint by Members of the European Parliament (MEPs) and the upcoming Inter-Institutional Agreements between the Parliament and European Commission on a mandatory Transparency Register and on Better Regulation, as well as the next Transparency Register review, all present opportunities to make EU decision-making more transparent and responsive to EU citizens.

Lobbying of the European Union (EU) needs to become more transparent and open to public scrutiny. EU policy-makers should therefore collect and disclose comprehensive information on who influences whom in the EU decision-making process to ensure a level playing field for all interest representatives and thus balanced legislative outcomes. It will help to ensure that

legislation has the public interest at its heart and that the risks of corruption, conflicts of interest and regulatory capture are reduced.

The aim of such disclosure is to document lobbyists' influence on policies and legislation. Whether annexed to legislative reports or published in 'real time' on official websites, such initiatives serve to inform the public which interests have shaped draft and final legislation.

Despite increasing calls for the introduction of 'legislative footprints' to better track and monitor the real level of influence of lobbyists on the decisions that are taken by the democratically elected representatives and administrations, its use is still new to the European institutions. Regulatory efforts and emerging good practice can be found in the European Commission and the European Parliament. All these initiatives fail however to provide comprehensive data that would inform EU citizens on who sought to influence which legislative act, how and with which human and financial resources and through which channels.

## THE ISSUE

Lobbying is an integral part of a healthy democracy, closely related to universal values such as freedom of speech and the right to petition of government. It allows for various interest groups to present their views on public decisions that may come to affect them. It also has the potential to enhance the quality of decision-making by providing channels for the input of expertise on increasingly technical issues to legislators and decision-makers. According to a 2013 survey of 600 European parliamentarians and officials, 89 per cent agreed that, "ethical and transparent lobbying helps policy development"<sup>1</sup>.

Despite this, multiple scandals throughout Europe demonstrate that without clear and enforceable rules, a select number of voices with better resourcing and contacts can come to dominate political decision-making. At the very least, this can skew individual decisions, and at the worst, it can lead to regulatory and even state capture.

Brussels is one of the lobbying capitals of the world. Estimates of the numbers of lobbyists (or 'interest representatives') vary from 15,000 to 30,000<sup>2</sup>, whose job is to influence regulations and laws that shape Europe's single market of more than 500 million citizens.

### DEFINITION: Lobbying

Lobbying is any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision-making, and carried out by or on behalf of a client or any organised group.

EU-level lobbying happens at all stages of the legislative process: from the early stages of policy formulation, to the moment the European Commission considers proposing a new legislative initiative, throughout the public consultation and impact assessment phase, and finally during European Parliament readings and Council negotiations, whether at Committee/ Working Group level, in plenary or trilogue negotiations. Contributions by lobbyists to the EU's legislative process assist the development and implementation of EU public policies, as they provide EU officials with essential technical information, supporting data and good practice examples.

### DEFINITION: Undue Influence

Undue influence occurs when particular individuals or groups gain an unfair advantage by excessively influencing a decision-making process to their own ends, at the expense of the public interest.

Undue influence can occur when decision-making is opaque, when public officials and/or lobbyists act unethically and when access is skewed in favour of select interests.

However, undue influence can result in policy and legislation serving private interests rather than the public interest.

This is a particular risk when well-resourced global corporations are concerned<sup>3</sup>. More than half of Europe's citizens consider their country's government is run to a large extent or entirely

# THE SOLUTION

## INSTITUTE AN EU LEGISLATIVE FOOTPRINT

by a few big interests (TI Global Corruption Barometer, 2013)<sup>4</sup>. Businesses themselves are aware of the risks. 80% of European companies consider that the links between business and politics are too close in their country and lead to corruption (EU Anti-Corruption Report, 2014). More generally, according to the 2014 OECD report, 80% of legislators and 90% of lobbyists think inappropriate influence-peddling takes place, and one-third of legislators consider it a frequent problem.

The EU is not insulated from these risks. A 2014 survey found that 70% of citizens believe that corruption is present in the EU institutions and recent high-profile corruption scandals have involved attempts to influence the legislative process. They include the recent tobacco industry scandal involving the EU's Commissioner for Health (also called the 'Dalligate affair')<sup>5</sup> as well as the "Cash-for-amendments" scandal<sup>6</sup> that involved a number of Members of the European Parliament (MEPs).

The 'LobbyPlag.eu' initiative has also detailed the extent to which legislative amendments to the Data Protection Directive were cut and pasted from the lobby documents of large corporations and business associations - including one case where an MEP had tabled 158 amendments against data privacy, which appear to be heavily influenced by commercial lobbies.<sup>7</sup>

These cases have contributed to a deep mistrust of the integrity of the law-making process in Brussels. Creating a legislative footprint for EU legislative files would help restore this trust, as well as mitigate risks of conflicts of interest and corruption.

Calls for enhanced lobbying transparency and an effective 'legislative footprint' are increasing within and beyond the EU.<sup>8</sup> Legislative footprints provide detailed information on who has influenced a certain piece of legislation, how and when. This information on lobby influence can be derived from disclosed records of contacts between elected or public officials and lobbyists, of lobbyists' written input but also of analyses of text passages and wording taken from lobbyists that have found entry into legislative texts (as conducted, for example, by lobbyplag.eu). Only a combination of all such exercises can lead to a comprehensive picture of lobbyists' influence on legislation.

Legislative footprints can help improve the outcomes of public policy-making and reduce the risk of corruption. By making it clear who policy-makers are speaking with, it can help to ensure consultation with a wider, more representative group of stakeholders and reduce the risk of 'groupthink' in the decision-making process, especially when the information is published immediately or shortly after the lobbying contact. They help to detect and prevent potential conflicts of interests, as the influence can be traced and cross-checked with information on, for example, MEPs' declarations of financial interests and in the Transparency Register. Legislative footprints can also improve accountability by allowing voters to monitor parliamentarians' activities in real-time<sup>9</sup>. They also allow institutions to have an overview of who is trying to influence them and how much time is spent engaging with lobbyists.

However, the use of an effective legislative footprint as a tool to enhance transparency, integrity and accountability in public policy is still a new concept to the European region. A number of EU member states have already taken

the approach to require the publication of some level of documentation, providing a light form of a legislative footprint.<sup>10</sup>

In Latvia, any draft law that comes before the Latvian parliament should enclose an explanatory note, in which, among other things, all consultations that have been held while preparing the draft law should be specified.<sup>11</sup> In principle this explanatory note should also indicate the lobbyist, with whom the submitter of the draft law has consulted. The footprint does not function as intended however, because institutions do not follow the rules and there is no oversight or verification system in place to compel them to do so.<sup>12</sup>

In Poland, the act on lobbying compels ministries to publish all documents related to the drafting of particular legal acts. Those interested in a piece of legislation, including professional lobbyists,

must provide relevant ministries with declarations describing the interest that they are planning to defend or promote during their work. Those declarations are also made public.

A number of countries have taken a more piecemeal approach, requiring the publication of some level of documentation, providing a mini-footprint related to decision-making by public officials.<sup>13</sup> In France, the authors of parliamentary reports in the National Assembly must annex a list of persons consulted. However, this obligation does not apply to other institutions that participate in the decision-making process. Therefore, while there are requirements for tracking the consulted interests groups at the Assembly level, the potential of the tool is not used to the fullest since it fails to provide an exhaustive list of all consulted interest groups at the final stage of legislation.

**Table: Legislative footprint**

Are legislators required by law to publish a legislative footprint including details of the time, person, and subject of contacts with stakeholders and do they do so in practice?

	In law	Pratice
Yes	Latvia, Poland	
Partially/piecemeal approach	Austria, Estonia, European Commission, France, Lithuania, the Netherlands, Slovenia	Cyprus, Estonia, European Commission, European Parliament, France, Lithuania, the Netherlands, Poland, Portugal, Slovenia, the United Kingdom
No	Bulgaria, Council of the EU, Cyprus, the Czech Republic, European Parliament, Germany, Hungary, Ireland, Italy, Portugal, Slovakia, Spain, the United Kingdom	Austria, Council of the EU, Germany, Hungary, Ireland, Italy, Latvia, Slovakia, Spain



# RECOMMENDATIONS

## AN EFFECTIVE EU LEGISLATIVE FOOTPRINT

Some political parties and groups are also being proactive. In Spain, the UPyD Parliamentary Group publishes on a bi-weekly basis on their website the list of meetings held with civil society and other lobbyists, and other parties publish their agendas, including the Inicitiva per Catalunya Verds, EUiA and Compromís.

At the EU level, Members of the European Parliament (MEPs) have since 2008 endorsed the idea of a legislative footprint for the Commission and Parliament, indicating however that this should be done by “rapporteurs” (lead authors of Parliamentary legislative reports) on a voluntary basis only.<sup>14</sup> In 2011, the European Parliament also endorsed a proposal for a legislative footprint annex to reports drafted by MEPs, listing all the lobbyists who lead MEPs (such as rapporteurs) met while a legislative report was being drafted.<sup>15</sup> In 2014, a total of 182 members of the new European Parliament signed the Transparency International Anti-Corruption Pledge<sup>16</sup> launched ahead of the European Parliament election. MEPs committed themselves “to uphold both the letter and spirit of the Code of Conduct for MEPs and to publish a ‘legislative footprint’ that will be attached to any report drafted in their office.”<sup>17</sup>

A number of voluntary good practice examples by MEPs and delegations have also emerged and appear - despite widespread concerns regarding the administrative burden - to be feasible and manageable.<sup>18</sup> Some MEPs publicly record meetings with stakeholders – not on their respective websites of the European Parliament, but only on their own websites – while others have added invitations for speaking engagements to the list.<sup>19</sup> Promisingly, examples also exist of rapporteurs annexing lists to reports of all those lobbyists who have submitted contributions to, or

otherwise influenced, the drafting process.<sup>20</sup>

The recent adoption of the two European Commission Decisions<sup>21</sup> to record and publish data on meetings between high level public officials and interest representatives is a big step in the right direction. Since 1 December 2014, senior European Commission staff, including Commissioners, members of their Cabinets and Directors-General, are required to disclose on their websites details of meetings with lobbyists, including the names of organisations and self-employed participants, time, location and the subject of the meeting.<sup>22</sup> Similarly, in the U.S., the country’s Securities and Exchange Commission (SEC) publishes all public appearances by officials, public hearings in administrative proceedings and SEC meetings, including the minutes of the respective meeting.<sup>23</sup>

Transparency International (TI) welcomes the latest regulatory efforts and emerging practice at the EU level as well as European Commission Vice-President Timmermans’ call for the Council and European Parliament to follow suit with the practice of publishing lobby contacts, as introduced by the European Commission in December 2014. However, these initiatives fall short of the steps necessary to create a legislative footprint for EU legislation. Therefore, TI recommends to all three EU institutions to record and disclose all input received from lobbyists/ interest representatives for draft policies, laws and amendments. In detail, TI suggests the following disclosure guidelines:

### The European Commission:

The European Commission should expand and improve its existing initiative as laid out in its recent Decision of 25 November 2014 on the publication of information on meetings held between Members of the Commission and organisations or self-employed individuals.

### In detail:

- **Who: Expand reporting to everyone involved in the EU policy-making process**

The recording of meeting data should be expanded to everyone involved in the EU’s policy-making process. Apart from Commissioners, Cabinet members, and Directors-General, all EU public officials that are directly involved in the policy-making process should record data on their lobby contacts.

- **What: Disclose comprehensive and meaningful information on lobbying**

Any contribution that has had or sought to have a tangible influence on the draft legislation or the political process should be disclosed in a comprehensive manner - regardless whether this comes in form of a written contribution or a personal meeting. For meetings the recorded data should include the date, name of the person taking the meeting, the lobby organisation, including the Transparency Register ID (only registered lobbyists should be met), the client (if applicable – and including the Transparency Register ID), also the individual lobbyists’ name and, most importantly, the topic of discussion and the specific legislative file, if applicable.

- **How: Centralise, standardise and interlink already existing lobbying information**

The information on lobby influence should be made available to the public in one centralised online database. Lobby contacts are currently published on a total of 89 different websites, including on the 28 individual websites of Commissioners, on the 28 websites of their cabinets and 33 websites of the Directorates-General. The European Commission should strive to simplify the access to information by making it available in one centralised database equipped with solid search functions, and in a consistent format. A necessary next step to enhance transparency and accountability of the EU institutions is also to link the disclosed data on lobby meetings with information from the already existing Transparency Register, which should become the one-stop-shop for all lobbying activity, detailing real-time lobby meeting information in combination with human

and financial capacity invested by lobbyists to shape the EU's legislation and information on the beneficiaries of EU funds. Also written input by stakeholders to consultations that is found to be influencing the decision of the policy-maker should be made publicly available in a more systematic and easily searchable manner, for example on the Your Voice in Europe website, which could also be linked with the Transparency Register.

• **When: Disclose lobby information in a timely manner**

Commission staff should be required to file information on lobby contacts online as close to real time as possible, at the latest within the two week period foreseen for EU senior officials.

**The European Parliament:**

The European Parliament should make it obligatory for rapporteurs, shadow rapporteurs and committee chairs to publish a legislative footprint. MEPs, their offices and political groups should publish detailed information on lobby contacts as a matter of best practice.

• **Who: Extend reporting to everyone involved in the EU policy-making process**

Members of the European Parliament, their Accredited Parliamentary Assistants, Political Group staff and relevant administrators in the Committee Secretariat and research departments should record and disclose information on who has sought to influence them, when and how, as they are also regularly approached by lobbyists. This

should be required for all lead MEPs, including rapporteurs, shadow rapporteurs and chairs. At a minimum, rapporteurs should annex a list of all relevant lobby contacts during the drafting process to Committee Reports due to their particularly influential role in the legislative process. In any case, only lobbyists that are registered in the EU's Transparency Register should be met with.

• **What: Disclose comprehensive and meaningful information on lobbying**

Any contribution that has had or sought to have a tangible influence on the draft legislation or the political process should be disclosed in a comprehensive manner. This should include contacts, including scheduled meetings with lobbyists, participations in briefings or conferences and written input. Exceptions should take account of the European Commission guidelines. Where contacts are not aimed at influencing legislation (e.g. constituent inquiries or personal contacts); or where publication would endanger the life, integrity or privacy of the individual, interfere with court proceedings or administrative procedures, the information should be adapted or withheld from publication. Along the lines of the recently introduced practice of the European Commission, the recorded data should however include: the date; the name of the person taking the meeting (MEP, APA, etc.); the lobby organisation, including the Transparency Register ID (only registered lobbyists should be met); the client (if applicable – and including the Transparency Register ID); the individual lobbyists' name; the topic of discussion (in bullet points or keywords); and the concrete legislative file, if applicable.

**How: Centralise and standardise disclosure of lobby information**

In order to ensure that recorded and disclosed information is as useful as possible to the public, the information on lobby contacts should be published in a standardised online format on the MEPs websites and collated in one central European Parliament online database that is easily accessible and searchable by all. This way, Parliamentary Committees rapporteurs and shadow rapporteurs can immediately and in a less burdensome way extract the lobby information necessary for the annex to parliamentary reports. Such recording should become

standard practice by all to track the influence of lobbyists on parliamentary documents as well. This would facilitate citizens' access to information and allow for a broader overview of who is contributing to which legislative initiative.

• **When: Disclose lobby information in a timely manner**

European Parliament staff should be required to file information on lobby contacts online as close to real time as possible, latest within the two week period that applies to senior staff in the European Commission.

THE MAJORITY OF MEP RESPONDENTS TO TI-EU'S SURVEY<sup>24</sup> ON THE LEGISLATIVE FOOTPRINT REPLIED THAT:

- In-person meetings, written submissions, phone/skype calls and the attendance of MEPs at events should be disclosed to the public. It was also suggested that the recording depends on whether this 'contact' with lobbyists influenced a draft legislation.
- With a view to information on lobbyists, his job title, the date and form of the contact (see above) as well as whether he is registered in the EU's Transparency Register was found to be the most relevant information.
- Less so for the administrative level, the legislative footprint should be the rule for the political level in all three EU institutions, with all respondents being in favour for the European Parliament, followed by 96% for the European Commission.
- As a general guideline, the timeframe for the recording of lobby contacts should be from within a week up to a month after the contact.
- Reporting and disclosure was found to be best manageable through a standardised, electronic form provided by the EU institutions' administration and managed directly by the MEP offices.
- A specially appointed ethics committee was seen to be best suited to monitor compliance.

*This EU Policy Paper was produced by Dr. Janina Berg and Daniel Freund (Transparency International EU, TI-EU). It is part of series published in the framework of TI's pan-European project on 'Lifting the Lid on Lobbying' conducted in 18 EU member states with financial support from the Prevention of and Fight against Crime Programme of the European Commission Directorate-General for Home Affairs and the Adessium Foundation. This publication reflects the views only of the author, and none of the aforementioned donors*

*can be held responsible for any use which may be made of the information contained therein. For more information on the regional and national studies, visit:*

[http://www.transparency.org/news/feature/veiled\\_in\\_secret\\_lobbying\\_in\\_europe](http://www.transparency.org/news/feature/veiled_in_secret_lobbying_in_europe)

© 2015 Transparency International. All rights reserved.

# FREQUENTLY ASKED QUESTIONS

## EU LEGISLATIVE FOOTPRINT

### What about the EU Council?

Transparency International believes that legislative transparency can only work if it involves the entire legislative process from start to finish and all institutions that take part in it, including the EU Council Making lobby influence on the Council – and therefore on national governments – visible is however more difficult than for the European Parliament and the European Commission. A meaningful recording of lobby contacts for the Council must include the Council secretariat and the Permanent Representations of member states in Brussels, but also lobby contacts that take place in the 28 national capitals. Since the latter falls under the competence of member states we have decided not to focus on this aspect in this paper.

### Would I have to register every email or phone call?

No, only those that have had or sought to have a tangible influence on the draft legislation or the political process should be registered. We leave this to the good judgment of MEPs and officials to determine which contacts sought to have a tangible influence. Sometimes a brief unscheduled phone call can have significant impact – and then it should be declared. But emails often have no informative contact and we also see that MEPs receive an enormous amount of emails and calls targeting them collectively as MEPs – these general contacts that often have very little, or no, effect would not have to be declared.

### What if I meet a whistleblower or human rights defender?

Along the lines of the European Commission guidelines, Transparency international recommends that contacts not aimed at influencing legislation (e.g. constituent inquiries or personal contacts) or where publication would endanger the life, integrity or privacy of the individual, interfere with court proceedings or administrative procedures, the information should be adapted or withheld from publication.

### What if I meet with a diplomat or other person/ organisation not falling under the scope of the transparency register?

Transparency International recommends to publish all contacts with persons or organisations that have had or sought to have a tangible influence on policy-making. As a general rule this should include every person or organisation that falls under the scope of the Transparency Register. For persons or organisations that do not fall under the scope of the register – such as diplomats, European Commission or Council officials, EU member state governments – we leave the decision up to the good judgment of MEPs and officials. If they feel that the publication of a contact would provide useful information to the public a contact can be published – but this is not generally expected.

### What if I meet a lobbyist at a reception? Particularly if I don't even know who they are?

Such unforeseen encounters that do not aim to influence legislation would not have to be declared. And if you do not know who you spoke to or were unaware that it was a lobbyist, publication is simply impossible. Once again, we leave this to an official or MEP's judgement to determine which contacts sought to have a tangible influence and which contacts should be declared. Sometimes a short meeting can have a significant impact or be followed-up by an email with concrete proposals – in which case the meeting should be declared.

### How am I supposed to handle the administrative burden?

The additional administrative burden of publishing lobby contacts should be as little as possible. Smart IT solutions can greatly facilitate this process, for example by allowing the export of information from Outlook calendars where meeting information has already been inserted. Once this is properly integrated into the normal workflow of office management and scheduling the additional burden should be minimal. The administration of each institution should be able to help. For example, the European Parliament administration could facilitate this by providing appropriate online tools and software to MEPs.

### How detailed should the information on the meeting be?

The information provided under “topic of discussion” should provide an idea of what this meeting was about in a few bullets or keywords. If a specific legislative process or file was discussed, that should be mentioned here. As an example, to simply list “Transparency” as meeting topic is probably too general. “Mandatory Lobby Register + EP Code of Conduct reform” would allow everyone to have a clearer idea on what that specific meeting was about.

### Does the publication of lobby meetings give an incentive for a multiplication of useless meetings?

Lobbyists will always seek meetings that are relevant for the area of their work. MEPs and officials will have to continue to make the call on which meetings they take and which ones they decline – as is the case without the publication of lobby contacts. One intended consequence of the legislative footprint is however to level the playing field for the representatives of all interests and to ensure a fair, open and balanced policy-making process. If the publication of lobby contacts allows all lobbyists to track their counterparts and potentially counter their arguments this will ultimately yield better legislation. The final call – and vote – will of course always remain with the members of the European Parliament.



## NOTES:

- Burson-Marsteller, A Guide to Effective Lobbying in Europe – The View of Policy-Makers (2013), p. 6, available online at [http://lobbyingsurvey.burson-marsteller.com/wp-content/uploads/2013/05/european\\_lobbying\\_survey\\_2013.pdf](http://lobbyingsurvey.burson-marsteller.com/wp-content/uploads/2013/05/european_lobbying_survey_2013.pdf)
- See the OECD website on Fighting corruption in the public sector, available online at <http://www.oecd.org/corruption/ethics/lobbying.htm> or Corporate Europe Observatory's (CEO) Lobby Planet: Brussels – The EU quarter (2011), available online at <http://corporateeurope.org/sites/default/files/publications/ceolobbylow.pdf>
- Concerns over privileged access to EU policy-makers for large corporations dominating the stakeholder input process have, for example, been raised most recently regarding the ongoing Transatlantic Trade and Investment Partnership (TTIP) negotiations. Of the 154 meetings that the European Commission's DG Trade held with external stakeholders on TTIP, 113 were with industry, 19 with public interest groups, 19 others and three unknown, see <http://ttip2014.eu/blog-detail/blog/lobbying%20TTIP.html>
- See TI 2013 Global Corruption Barometer, p. 15, available online at <http://www.transparency.org/gcb2013>
- Additional information on the Dalli affair is available online, see for example EuropeanVoice, 'John Dalli resigns' (16 October 2012), <http://www.europeanvoice.com/article/john-dalli-resigns/>; or EUobserver, EU anti-fraud office accused over cover-up in Dalli affair (22 March 2013), <https://euobserver.com/institutional/119529>
- The Cash-for-amendments scandal refers to one of the biggest lobbying scandals in the history of the EU. In 2011, Sunday Times journalists posed as lobbyists secretly filming four Members of the European Parliament while negotiating a deal to table amendments in the European Parliament in exchange for money. For more information, see for example EUobserver, 'Confusion reigns over MEP cash-for-amendments probe' (28 March 2011): <https://euobserver.com/news/32082>; Brussels Sunshine Blog, 'Cash-for-amendments scandal just the tip of the iceberg' (30 March 2011): <http://blog.brusselssunshine.eu/2011/03/cash-for-amendments-scandal-just-tip-of.html>; Transparency International-EU Office, Lessons learned from the EU's cash-for-amendments scandal? <http://www.transparencyinternational.eu/2013/01/strasser-verdict-shows-more-to-do-for-eu-anti-corruption/>; EurActiv, 'Ex-MEP to serve prison in 'cash-for-laws' scandal' (3 February 2014): <http://www.euractiv.com/future-eu/ex-mep-serve-prison-cash-laws-sc-news-533205>
- <http://falkvinge.net/2013/11/22/lobbies-switch-from-influencing-to-directly-writing-european-laws/>
- OECD, Lobbyists, Governments and Public Trust, Volume 3 – Implementing the OECD Principles for Transparency and Integrity in Lobbying (2014), [http://www.oecd-ilibrary.org/governance/lobbyists-governments-and-public-trust-volume-3\\_9789264214224-en](http://www.oecd-ilibrary.org/governance/lobbyists-governments-and-public-trust-volume-3_9789264214224-en); see also the WHO guidelines on implementation of art. 5(3) of the WHO Framework Convention on Tobacco Control: [http://www.who.int/fctc/guidelines/article\\_5\\_3.pdf](http://www.who.int/fctc/guidelines/article_5_3.pdf); or the Lobbying Disclosure Guidelines of the Sunlight Foundation (2014): <http://sunlightfoundation.com/blog/2014/12/09/in-honor-of-international-anti-corruption-day-new-tools-for-transparency/>
- Transparency International Anti-Corruption Helpdesk Query on Legislative Footprint, prepared by Martini/Chene/ Hodess (2013), available online at [http://www.transparency.org/files/content/corruptionqas/legislative\\_footprint.pdf](http://www.transparency.org/files/content/corruptionqas/legislative_footprint.pdf)
- According to Transparency International research (publication is expected in Feb. 2015), these include the following EU member states: Austria, Cyprus, Estonia, France, Lithuania, the Netherlands, Poland and Slovenia. In Germany, the results emerging from consultations with associations, and in particular their main suggestions, need to be listed in the covering letter of written cabinet decisions that prepare federal government decisions, see OECD, Lobbyists, Governments and Public Trust, Volume 3 – Implementing the OECD Principles for Transparency and Integrity in Lobbying (2014), p. 29, available online at <http://www.oecd.org/gov/ethics/lobbyists-governments-and-public-trust-volume-3-9789264214224-en.htm>
- Latvian Saeima Rules of Procedure, Article 79.3 and 85.5.6.
- TI Latvia, Lifting the Lid on Lobbying: Latvia National Report (Riga, TI Latvia: 2015).
- These include Austria, Cyprus, Estonia, France, Lithuania, the Netherlands, Poland and Slovenia.
- See European Parliament resolution of 8 May 2008 on the development of the framework for the activities of interest representatives (lobbyists) in the European institutions (2007/2115(INI), <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P6-TA-2008-0197+0+DOC+XML+V0//EN>; see also the Parliamentary Question of MEP Anneli Jäätteenmäki of 2009, available online at <http://www.europarl.europa.eu/sides/getDoc.do?type=WQ&reference=P-2009-1552&language=EN>; and more recently, the European Parliament's Gualtieri Report on the modification of the Inter-Institutional Agreement on the Transparency Register of 31 April 2014, available online at <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-2014-0258+0+DOC+XML+V0//EN>
- European Parliament Press Release, MEPs back joint Parliament-Commission register for lobbyists (May 2011), available online at <http://www.europarl.europa.eu/news/en/news-room/content/20110429FCS18372/12/html/MEPs-back-joint-Parliament-Commission-register-of-lobbyists>
- See <http://www.transparencyinternational.eu/2014/10/european-parliament-elections-2014-the-anti-corruption-pledge/>
- See <http://anticorruptionpledge.eu/>
- Cf., for example, MEP Rivasi's website: <http://www.michele-rivasi.eu/agenda/agenda-%E2%80%93-semaine-du-13-au-18-octobre-paris-lyon-bruxelles-douai-et-valence/>; with MEP Bütikofer's: <http://reinhardbuetikofer.eu/meine-lobbyistenliste-von-april-bis-ende-juli-2014/>; or MEP Hautala's: <http://heidihautala.com/en/parlamentti/lobbarilista/>; MEP Corbett's <http://www.richardcorbett.org.uk/about-me/legislative-transparency/>; and MEP Reda's additional analysis of the lobby data recorded: <https://juliareda.eu/2015/01/report-eu-copyright-rules-maladapted-to-the-web/>; also see the recording of the UK Tories: <http://conservativeeurope.com/transparency>
- See footnote above.
- See, for example, report by MEP Avril Doyle, A6-406/2008 - page 70: <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+REPORT+A6-2008-0406+0+DOC+PDF+V0//EN&language=EN>; MEP Chris Davies' explanatory note in the report 'A Roadmap for moving to a competitive low carbon economy in 2050', see p.22: <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+REPORT+A7-2012-0033+0+DOC+PDF+V0//EN&language=EN> as well as MEP Linda McAvan's annexed, detailed legislative footprint to her report, see p.81: <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+REPORT+A7-2013-0276+0+DOC+PDF+V0//EN>
- See European Commission Decisions of 25 November 2014 on the publication of information on meetings held between Members of the Commission and organisations or self-employed individuals, C(2014) 9051 final, [http://ec.europa.eu/news/2014/docs/c\\_2014\\_9051\\_en.pdf](http://ec.europa.eu/news/2014/docs/c_2014_9051_en.pdf), and between Director-Generals of the Commission and organisations or self-employed individuals C(2014) 9048 final, [http://ec.europa.eu/news/2014/docs/c\\_2014\\_9048\\_en.pdf](http://ec.europa.eu/news/2014/docs/c_2014_9048_en.pdf)
- Jean-Claude Juncker, A New Start for Europe: My Agenda for Jobs, Growth, Fairness and Democratic Change – Political Guidelines for the next European Commission (15 July 2014), p.11, available online at [http://ec.europa.eu/priorities/docs/pg\\_en.pdf](http://ec.europa.eu/priorities/docs/pg_en.pdf)
- <http://www.sec.gov/about/upcoming-events.htm#meetings>
- In autumn 2014, TI-EU has conducted a survey among all Members of the European Parliament on the feasibility and the practicalities of a legislative footprint. The feedback received from twenty-six offices has contributed and helped to inform TI's recommendations.



