



Report on the European Ombudsman's public consultation in relation to the transparency of the Transatlantic Trade and Investment Partnership (TTIP) negotiations

December 2014

Note: The views in this report reflect contributions to the public consultation and should not be regarded as stating the European Ombudsman's position.

1. Background

On 29 July 2014, the European Ombudsman opened an own-initiative inquiry towards the European Commission concerning transparency and public participation in relation to the Transatlantic Trade and Investment Partnership (TTIP) negotiations. On 19 September 2014, the Ombudsman launched a public consultation in the context of that inquiry. The purpose of the consultation was to give the public the opportunity to make known their views on the issues raised by the inquiry. The Ombudsman announced that she would consider the contributions received before presenting a set of further suggestions that the Commission should take into account as the negotiations proceed. The Ombudsman intends to publish her decision in this case in January 2015.

2. Overview of the responses

The Ombudsman received 315 responses to the dedicated TTIP email address set up for this public consultation. 55 responses were submitted by organisations, 3 by MEPs and 257 by individuals (see Annex). 242 replies were received in English, with the remainder in 8 other EU official languages (French: 30, Spanish: 17, German: 14, Dutch: 4, Slovenian: 3, Polish: 2, Swedish: 2, Italian: 1). The main suggestions put forward in these responses are outlined in Section 3 below. Further details can be found in the responses themselves.

The Ombudsman also received more than 6 000 emails, predominantly in English, from interested individuals [1]. The concern expressed in the overwhelming majority of these emails (and in many of the responses to the dedicated TTIP email address) was that the EU needs to be more transparent as regards TTIP, notably in relation to its contacts with business representatives. Given the number of individuals raising these points, the Ombudsman finds it appropriate to quote them at the outset of this report:



"The EU should be extremely open and transparent and immediately release all information on the TTIP negotiations, especially when it concerns areas such as environmental standards, workers' rights and health and safety.

The EU should lay open all communication between lobbyists of big business. Sadly, so far business had way more access to negotiations than normal citizens. That needs to change.

The EU should release a list of all the meetings that corporations have had with lawmakers."

3. Overview of the responses to each question

Concrete measures (Question 1)

Please give us your views on what concrete measures the Commission could take to make the TTIP negotiations more transparent. Where, specifically, do you see room for improvement?

Transparency

Respondents would like to see **more TTIP documents and information published online proactively** . Such material should be made available at the **earliest possible moment, regularly updated, easy to find and ideally in all EU official languages** . The Commission should exploit the possibilities offered by technology so as to, for example, allow the public to request notifications about changes in documents and about newly published documents. Detailed explanations should be given in relation to the content of key documents.

Some respondents argued that the **transparency measures** already adopted by the Commission are **totally unprecedented and risk compromising the negotiations** . More transparency would not be practically possible if the EU wishes to achieve a good outcome from the negotiations, they said.

A number of respondents supported the Ombudsman's suggestion for a **public register** of TTIP documents, with links to publicly available documents. The register should include a reference to confidential documents with the corresponding title, as well as the reason for confidentiality. This would allow applicants to make more precise requests for public access.

The following **categories of negotiating documents** [2] were mentioned as being of particular interest in terms of possible disclosure:

- Negotiating directives (**mandate**).
- **Initial EU position papers** on all sectors covered by the mandate (position papers could be more detailed and updated as the negotiations progress, some respondents said).
- **Negotiating positions** ahead of each negotiating round (as well as any further papers submitted by the EU in relation to its negotiating positions over the course of the



negotiations, said some).

- **Draft offer proposals** on all non-strictly tariff-related topics, at least on the EU side (one respondent mentioned that the Commission could make all EU documents and proposals public as soon as they are tabled as this can, by definition, no longer risk revealing the Commission's strategy to the US).
- **Consolidated texts** prior to each negotiating round (one MEP called for the publication of consolidated texts that relate to fundamental rights, public health, the environment and other matters of significant public interest. Other consolidated texts should be made public as soon as Parliament considers that a basic level of agreement has been reached between the two parties).
- **Draft and final** versions of **individual chapters** .
- Detailed **agendas** and detailed **reports of the negotiating rounds** (many respondents welcomed the new 'State of play' document, which the Commission publishes after each round. Some suggested that it be expanded to include information on the content of what has been agreed per subject, and the issues that still need to be discussed).
- The **final text of the agreement** prior to initialling.

Some respondents went further: one suggested that the Commission publish all **legal opinions** pertaining to the interpretation of the draft negotiating text; others mentioned that transparency should concern not only the documents generated by the EU, but also **US documents** that are in the possession of the EU [3] .

Many respondents recognised the need for **certain documents to remain confidential** (for example, in the area of tariffs or market access for services and public procurement). This should be limited to protecting strategic interests during the negotiations and should be limited in time, said some. Moreover, the Commission must explain how disclosure of the relevant document would be detrimental to the negotiating process [4] . One respondent suggested that such decisions be automatically reviewed by the Ombudsman, as if they had been subject to a complaint.

Some respondents asked for **unambiguous rules** as regards the **classification** of documents in order to prevent arbitrary decisions. One MEP made detailed suggestions on this issue. Some respondents suggested that a special external group be established to determine the classification of TTIP documents or that this be done by an independent body, such as the Ombudsman.

Some respondents underlined that there should be no selective access to any documents, the guiding principle being that **if it is available to one it must be available to all** . One respondent suggested, in this vein, that an overview of disclosed documents, including details of recipients, be made publicly available. A further submission mentioned that the fact that TTIP documents, except for the mandate, are in English only reinforces the sense that only an exclusive club can have access to them.

Finally, in relation to transparency, the following measures were suggested:

The **negotiating process** could be **webcast** , with access to rooms where negotiations are



being conducted provided to accredited representatives without speaking rights.

The Commission could arrange **online webinars** to explain the process of trade negotiations and inform the public about free trade agreements generally.

Public participation

Many respondents brought forward ideas to promote greater public participation, notably in relation to the following:

TTIP Advisory Group

The Commission's decision to set up an Advisory Group was broadly welcomed. The following suggestions for improvement were made, some by organisations represented in the Group:

Composition

The Commission should **disclose more details** regarding the Group's composition, appointment and role.

A **more balanced** Group should be established. According to one trade union respondent, corporations currently outnumber trade union members four to one.

The Group should develop its practice of including **experts on specific subjects** .

Access to information

Texts and proposals being developed for future negotiating rounds should be **presented to the Group in a timely manner** so as to allow members, and their experts, to provide detailed feedback before each round.

The Group should be granted the same **access to consolidated texts** as that given to the Council and the Parliament.

The Group should be given comprehensive **briefings on US positions** even if these are not made public by the US. The Group should also be able to comment on US positions.

Reading room

The reading room should be transferred to an **online secured access tool** (e.g. ECAS), allowing comments and modifications to be made by Group members and their experts in track-changes.



Experts nominated as issue-specific alternates of Group members **should have access** to the online secured access tool.

Sanctions should be imposed, such as exclusion from the Group, where members (or their alternates or experts) breach confidentiality.

Feedback

The Commission should **respond to comments** and proposals for modification made by Group members and their alternates.

Advice given by the Group should be **published**, as should an explanation of how the Commission has taken that advice into account.

Public consultations

The following suggestions were made in relation to public consultations carried out by the Commission concerning TTIP [5] .

Some respondents suggested that public consultations be held: (i) on **initial position papers** to be produced by the Commission on every subject included in the negotiating directives (or alternatively, on each aspect of trade that touches on EU and national rule-making); (ii) on each specific **chapter** – once concluded and published; (iii) on the **final draft consolidated text** prior to initialling. Others referred to the need for a **sustainability impact assessment** .

A number of respondents mentioned that there should be special emphasis on **involving ‘under-represented’ groups** . The **languages** used should be appropriate to encourage participation.

The Commission should deal meaningfully with responses, produce a **detailed analysis report** and conduct a **dedicated stakeholder dialogue** to discuss the results. All proposals made in response to these public consultations should be **published online** .

The Commission should ensure that the **results** of the public consultations are **fully reflected in the orientation** the negotiations take. Where this does not happen, the Commission should provide full explanations.

Some contributions drew attention to **technical barriers** encountered in responding to public consultations, such as systems crashing, character limits in free text options and biased multiple choice questions.

Stakeholder involvement



Structured stakeholder involvement

Some respondents pointed out that DG Trade has already organised many meetings on TTIP in the framework of its longstanding Civil Society Dialogue. Moreover, new stakeholder meetings have been organised during the TTIP negotiating rounds, allowing interested parties to express their views and receive a briefing from the Chief EU and US negotiators. The following suggestions for improvement were made:

The **TTIP taskforce** within the Commission should be strengthened, with particular emphasis on liaison points for civil society.

One respondent suggested that the Commission create a **timeline, including all the steps in the negotiations** and the documents published. The early publication of meeting schedules of negotiating groups, as well as dates for each negotiating round, is important in order to keep stakeholders involved. One further suggestion was for the Commission to publish a **calendar of activities for upcoming TTIP negotiating rounds**, indicating for specific issues a contact person to whom public suggestions could be addressed.

The Commission should hold stakeholder conferences **ahead of and immediately after each negotiating round**. A more **detailed table setting out the position on each chapter** should be drawn up (an expanded 'State of Play' document) and provided more swiftly than at present, said some respondents.

The Commission should organise **issue-specific stakeholder briefings** [6]. One respondent mentioned that it would be useful to have access to information about the status of negotiations in the field of adult education, for example.

On issues of particular concern to the social partners, such as labour standards, **social dialogue structures** should be adapted to allow for more in-depth discussions and texts should be made available. DG Trade, in cooperation with DG Employment, should further initiate discussions on relevant aspects of TTIP in all existing sectoral social dialogue committees and create fora for discussions between social partners where such committees do not exist. One trade union respondent mentioned that trade unions in the EU should be given access to EU negotiators commensurate to that given by the US to its trade unions.

The Commission should set up a **digital reading room** that would allow stakeholders to access confidential sector specific documents through an accredited password system. Such a system would also allow any leaks of confidential documents to be tracked. One contribution suggested that **sanctions** be put in place for breach of confidentiality including, but not limited to, possession, transmission, copy or publication on websites of restricted documents or parts thereof.

Some business organisations suggested that an **SME help desk** be established to serve as a contact point for companies, collect information and give advice on market access issues like trade barriers, challenges in public procurement, fulfilling standards requirements, etc.



Non-structured stakeholder involvement

In addition to the more structured forms of stakeholder participation outlined above, there are less structured forms involving, for the most part, meetings and correspondence with the Commission in relation to TTIP. An overwhelming number of responses to the Ombudsman's public consultation raised concerns about alleged corporate dominance of such meetings and contacts. The following suggestions were made to address this:

The Commission should **publish a list of all meetings** held by the negotiators with stakeholders (including industry and lobby organisations). Such a list should include the date of the meeting, the participants, and the topics discussed (in the form of agendas and minutes, for example).

The Commission should **publish all written communications** related to the negotiations between the Commission and stakeholders, including submissions.

The **composition and declarations of interest of negotiators** and of their teams should be published to avoid conflicts of interest or the perception of such conflicts. This should include individuals who were formerly involved in the negotiations but who have now left the Commission. In this latter regard, one contributor called on the Ombudsman to open an own-initiative inquiry into "revolving doors" cases in the context of the TTIP negotiations.

According to some respondents, over 30% of the private sector interest groups that have lobbied the Commission on TTIP are not registered in the (voluntary) **Transparency Register**. Obliging companies lobbying the EU to sign up to the register would increase transparency in this area, they said.

Some respondents argued that the **institutional culture** within the Commission tends to privilege corporate interests and that this needs to change.

Role of Parliament and the Council

A number of responses to the public consultation raised suggestions that are relevant to the European Parliament [7] and Council. As the Ombudsman's inquiry is focused on the Commission, the following highlights suggestions on which the Commission could possibly take action:

It was suggested that the Commission **publish all written communications** related to the negotiations between the Commission and institutional stakeholders (notably Parliament and Member States), as well as a **list of all meetings** held by the Commission with Parliament and Member States.

A recurrent suggestion in relation to the role of the European Parliament was that **MEPs should be fully informed**, including at the end of every negotiating round, so that they can follow the negotiations and scrutinise the draft and final versions of the agreement on behalf



of their constituents. Access to consolidated texts should be extended to other Parliamentary committees (and not only the International Trade Committee), and more widely, said some respondents.

Detailed rules governing **how Parliament and Council are kept informed** and contribute to the negotiation process must be public in order for these institutions, and for national authorities if involved, to be fully accountable to the citizens they represent, said some.

Best practice (Question 2)

Please provide examples of best practice that you have encountered in this area (for example, in particular Commission Directorates-General or other international organisations) that you believe could be applied throughout the Commission

Respondents to the Ombudsman's public consultation cited numerous best practice examples, notably the following:

WIPO: The negotiations that led to the World Intellectual Property Organisation Treaty to facilitate access to published works for the visually impaired have been held up as an example by many respondents, although some recognise that the TTIP negotiations are on a different scale. The release of progressively updated draft negotiating documents, WIPO webcasted negotiations, and listening rooms where stakeholders could hear negotiators work on specific issues were mentioned, as were the fact that agendas of meetings, lists of participants, draft clauses, and progress reports on the negotiations were published in a timely way. Stakeholders' working groups were set up and progress on their activities was made available online, said respondents. CSOs submitted comments throughout the process and contributed effectively to the final outcome, they said [8].

WTO: Even though respondents acknowledged that the WTO is regularly the subject of criticism by civil society, submissions made during negotiations, as well as offers and reports by committee chairs are available on the WTO website, they said. A range of negotiation texts can be consulted, including initial draft proposals, compromise texts, national submissions and minutes of most meetings. The texts can be consulted at different stages, from the version on the table of the negotiators to the final compromise agreed and the comments made by WTO members. By way of example, the WTO's negotiation process on a Trade Facilitation Agreement had as standard practice that the consolidated negotiation text was made public via its website after each negotiation round and prior to the following negotiation round. Some respondents suggested that the WTO might also serve as an example in terms of outreach. In particular, during Ministerial Conferences, NGOs are briefed on a daily basis and may submit position papers on particular WTO topics, which the WTO Secretariat distributes to members.

FTAA: According to a number of responses, despite the failure to reach a final agreement, the Free Trade Area for the Americas turned out to be one of the best examples of how trade negotiations can be open and subject to public scrutiny along the whole course of the



negotiations. An FTAA-dedicated website was created, on which the whole draft agreement text (referred to by some as "*the consolidated negotiation text, which we consider the most important document in any negotiation*") was published every time negotiators reached consensus on a new version. The website also contained written submissions by CSOs, detailed information on the instructions and timelines received by each negotiation group, as well as information on the chairmanship of each group for each negotiating round. Civil society was actively invited to contribute views on every aspect of the agreement, while negotiators identified and spread best practice concerning civil society consultation efforts at national and local level, said the respondents who cited this example.

UNFCCC: According to the contributions that mentioned the United Nations Framework for Convention on Climate Change, negotiating texts and submissions from the parties are made available before the negotiations start. Observers, including external stakeholders, attend the sessions and can provide submissions on request by the parties.

The Aarhus Convention : Other contributions mentioned that transparency should be promoted according to Aarhus Convention standards. Meetings of the governing body and its subsidiary bodies are, as a rule, public, they said. Accredited observers can participate in meetings of parties and in drafting groups to develop text during the negotiations. The Aarhus Convention Task Force on Public Participation in International Forums was also mentioned.

Finally, respondents mentioned (i) the Commission's Directorate-General for the Environment (specifically, its procedures for drafting non-legislative documentation); (ii) DG Agriculture's Milk Market Observatory; (iii) the Commission's 2010 decision to release a deliberative draft of the Anti-Counterfeiting Trade Agreement (ACTA); (iv) the World Health Organisation negotiations on a Convention on Tobacco Control, notably that the minutes of the Governing Body meetings were available on the Internet; (v) the UNECE compendium of case studies of good practice on promoting public participation, (vi) public consultations organised by the UK's Environmental Agency; (vii) the Croatian 'Code of Practice on Consultation with the Interested Public in the Procedures of Adopting Laws' and, in particular, the Croatian Office for Cooperation with NGOs; and (viii) the International Telecommunication Union, which - according to one respondent - began online streaming of meetings and publishing more documents (reports, amendments, Member State positions) to address criticism from NGOs.

Transparency effects (Question 3)

Please explain how, in your view, greater transparency might affect the outcome of the negotiations.

Most responses claimed that **greater transparency** would affect the outcome of the negotiations in a **positive** way. Specifically, they said that greater transparency:

- Will help redefine the process by which important decisions are taken in trade negotiations thus making the Commission more open, more accountable, and the beneficiary of **greater**



trust .

- Will result in **democratic legitimacy** and enhance the effectiveness, quality and balance of the agreement. TTIP largely deals with regulatory issues for which the EU has established procedures of public participation and transparency.
- Will be **beneficial** for the **future of the EU** more generally, as perceived lack of transparency on TTIP will strengthen the anti-European lobby.
- Is the best means to **dismantle myths** and misperceptions around TTIP.
- Will enhance the quality of the public debate surrounding TTIP, enabling stakeholders to impact the negotiations in a meaningful way **based on facts** and increasing the likelihood that parliaments will be able to give their consent.
- Will allow a broad range of **experts** to provide analytical input to the Commission (and Parliament).
- Could ensure support from a **broad majority** in the European **Parliament** for the final outcome by ensuring that Parliament can express informed concerns and evaluate whether those concerns have been taken into account.
- Will ensure the **early identification** of provisions that will not have the support of key stakeholders (and that would otherwise only emerge during the ratification process).
- Will reduce the risk that TTIP suffers the fate of **ACTA** , thus depriving EU citizens of the potential positive effects of a comprehensive TTIP.
- Has proven to be beneficial for the **development of trade** itself [9] .
- Will benefit the **public interest** rather than private interests.
- Will **empower citizens** and politicians at all levels and enable them to fully understand the changes that this agreement will bring about.
- Will allow those countries that will be affected by the agreement (such as EU candidate, potential candidate and EFTA countries), but who have not been involved so far, to track and possibly influence the progress of the negotiations.
- Will ensure that **confidentiality is respected** and unauthorised disclosure of documents reduced.
- Will **reduce the reliance on leaked documents** and create a level playing field for all to participate.
- Will result in a **lighter burden** on the Commission in terms of replying to requests for public access to documents.
- Will enable **SMEs** to adapt to the changing market conditions by gradually implementing measures that will be necessary from the entry into force of the agreement.

One respondent, on the other hand, argued that greater transparency:

- Will result in a **worse outcome** (or no outcome at all) for the EU for three reasons: (i) showing your cards to your opposite partner in any business negotiation weakens your negotiating power; (ii) published documents would supply "nay-sayers" endless technical details out of which to fabricate spurious claims of sinister plots to deprive the EU population of its political and labour rights, protection from harmful substances, etc; (iii) the Commission would be overburdened by demands to refute false accusations, correct misunderstandings or explain the intricacies of trade policy in general. A number of contributions pointed out that the **Union's strategic interests must remain confidential** throughout the negotiations. If not, it is likely to have detrimental effects on the outcome of the negotiations.



Finally, some respondents argued that greater transparency is never going to be granted because it would lead to the outright abandonment of the TTIP negotiations.

4. Overview of other points raised

Substance of the negotiations

Although the Ombudsman outlined that her public consultation did not relate to the substance of the negotiations, individuals raised concerns in relation to the following:

EU standards

Individuals questioned whether the EU will maintain its high standards in the areas of social welfare, working life, food quality, sustainable agriculture, etc.

Impact on public services

Concerns were raised about the possible privatization of public services, notably in the areas of health and education.

Impact on low income countries

Some respondents signaled that TTIP could impact negatively on less developed countries.

Investor State Dispute Settlement (ISDS)

Many individuals highlighted concerns in relation to ISDS.

Economic benefit

Some respondents referred to studies that have proved that TTIP will bring little economic benefit.

Timeframe

Some respondents insisted that the timeframe within which the TTIP negotiations are to be completed is too short. The speedier the process, the less transparent it will be, they said.



Stop TTIP

Some respondents called for the negotiations to be ended.

Debate in the Member States

According to some respondents, a mandatory and lengthy consultation process should be held in each Member State on whether or not the government in question should sign up to the agreement. Some contributors suggest a referendum in each Member State before the agreement is concluded. Others insist that the agreement be subject to a ratification process by national parliaments. Greater involvement of local authorities should also be foreseen. Many respondents cited a lack of information to the public in the Member States and the need for more information through the media.

Other Agreements

According to some respondents, the commendable efforts of the Commission and the US to increase transparency in the TTIP negotiations should be replicated in other trade agreements the Commission is negotiating. A further respondent suggested that the EU not negotiate with any trade partner who refuses to engage in talks based on democratic accountability and openness.

The Ombudsman's work

While the Ombudsman's decision to consult the public was welcomed, some respondents mentioned that the Ombudsman's work is not sufficiently well known. As such, responses are unlikely to reflect the widespread public opposition to TTIP. Other respondents, who learned of the public consultation only seven days before it ended, criticised this short timeframe for responding.

In terms of the follow-up to the public consultation, one contribution argued that for each measure that the Ombudsman suggests to the Commission, the latter should indicate how and when it will be implemented. Where a particular measure will not be implemented, the Commission should explain why.

Finally, the Ombudsman was encouraged to extend her inquiries to other Free Trade Agreements including the Trade in Services Agreement (TISA), the Comprehensive Trade and Economic Agreement (CETA), and other bilateral FTAs.

Annex: List of contributions



The following contributions were sent to the Ombudsman's dedicated TTIP mailbox.

Organisations

- Access Info Europe
- Access
- Allianz der öffentlichen Wasserwirtschaft e.V.
- Alpe Adria Green
- American Chamber of Commerce to the EU (AmChamEU)
- Bundesverband der Deutschen Industrie
- Bundesverband Öffentliche Dienstleistungen (bvöd)
- Business Europe
- City of Munich
- Client Earth
- Compassion in World Farming
- Confederación Española de Organizaciones Empresariales (CEOE)
- Confederation of Danish Industry
- Confederation of Swedish Enterprise
- Copa - Cogeca
- Corporate Europe Observatory (CEO)
- Dansk Magisterforening
- Elinkeinoelämän Keskusliitto (EK)
- European Association for the Education of Adults (EAEA)
- European Centre of Employers and Enterprises providing Public Services (CEEP)
- European Consumer Organisation (BEUC)
- European Digital Rights (EDRi)
- European Milk Board
- European Movement International
- European Public Health Alliance (EPHA)
- European Services Forum (ESF)
- European Trade Union Committee for Education (ETUCE)
- European Trade Union Confederation (ETUC)
- Foliovision
- Food & Water Europe
- Forum Informationsfreiheit
- Foundation for a Free Information Infrastructure (FFII)
- Friends of the Earth Germany (BUND)
- Friends of the Earth Europe
- Fundacja Panoptykon
- GMB Trade Union
- Handwerkskammer für München und Oberbayern
- Instytut Globalnej Odpowiedzialności Polska (IGO)
- Irish Business and Employers Confederation (IBEC)
- Irish Creamery Milk Suppliers Association (ICMSA)
- L'Association EDA (Environnement et Développement Alternatif)
- Maison du Peuple d'Europe - Huis van het Volk van Europa



- Pacte Civique
- Sindikat Vzgoje, Izobraževanja, Znanosti in Kulture Slovenije (VIZ)
- Standing Committee of European Doctors (CPME)
- Stop TTIP UK
- Trades Union Congress (TUC)
- Transatlantic Business Council (TABC)
- Transatlantic Consumer Dialogue (TACD)
- Transport & Environment
- Umweltinstitut München
- Unite the Union Ireland Region
- Verband der Automobilindustrie (VDA)
- Verbraucherzentrale Bundesverband e.V.
- Women in Europe for a Common Future (WECF)

MEPs

- Neena Gill MEP (S&D)
- Yannick Jadot MEP (on behalf of the Green/EFA Group)
- Anne-Marie Mineur MEP (GUE/NGL)

Individuals

257 contributions were received from individuals

[1] On 24 October, the organisation SomeOfUs encouraged its members to respond to the public consultation. Many of the emails in question were received over the following days.

[2] There may be considerable overlap among the different categories listed.

[3] Some respondents suggested that the US provide meaningful, non-confidential summaries of its negotiating positions and that EU and US documents be made publicly available in a balanced way so as not to put either of the negotiating parties' positions at risk.

[4] A number of respondents referred to Case C-350/12 P, *Council v. In 't Veld*, judgment of the Court (First Chamber) of 3 July 2014, not yet published.

[5] A number of further suggestions were made in relation to future international negotiations: these included that public consultations should be held before negotiations are launched and after the Commission has received the negotiating directives from the Council.

[6] By way of example, on 25 November 2014, the EU TTIP negotiating team for chemicals met EU civil society organisations.

[7] See, in particular, the responses from the three MEPs that are referred to in the annex.



[8] One respondent pointed out, however, that a lot of negotiating was done in non-public sessions and "informals".

[9] This respondent referred to the following: OECD Trade Policy Paper No. 153, 'Quantitative Evidence on Transparency in Regional Trade Agreements'.

Access Info Europe Access Allianz der öffentlichen Wasserwirtschaft e.V. Alpe Adria Green American Chamber of Commerce to the EU (AmChamEU) Bundesverband der Deutschen Industrie Bundesverband Öffentliche Dienstleistungen (bvöd) Business Europe City of Munich Client Earth Compassion in World Farming Confederación Española de Organizaciones Empresariales (CEOE) Confederation of Danish Industry Confederation of Swedish Enterprise Copa - Cogeca Corporate Europe Observatory (CEO) Dansk Magisterforening Elinkeinoelämän Keskusliitto (EK) European Association for the Education of Adults (EAEA) European Centre of Employers and Enterprises providing Public Services (CEEP) European Consumer Organisation (BEUC) European Digital Rights (EDRI) European Milk Board European Movement International European Public Health Alliance (EPHA) European Services Forum (ESF) European Trade Union Committee for Education (ETUCE) European Trade Union Confederation (ETUC) Foliovision Food & Water Europe Forum Informationsfreiheit Foundation for a Free Information Infrastructure (FFII) Friends of the Earth Germany (BUND) Friends of the Earth Europe Fundacja Panoptykon GMB Trade Union Handwerkskammer für München und Oberbayern Instytut Globalnej Odpowiedzialności Polska (IGO) Irish Business and Employers Confederation (IBEC) Irish Creamery Milk Suppliers Association (ICMSA) L'Association EDA (Environnement et Développement Alternatif) Maison du Peuple d'Europe - Huis van het Volk van Europa Pacte Civique Sindikat Vzgoje, Izobraževanja, Znanosti in Kulture Slovenije (VIZ) Standing Committee of European Doctors (CPME) Stop TTIP UK Trades Union Congress (TUC) Transatlantic Business Council (TABC) Transatlantic Consumer Dialogue (TACD) Transport & Environment Umweltinstitut München Unite the Union Ireland Region Verband der Automobilindustrie (VDA) Verbraucherzentrale Bundesverband e.V. Women in Europe for a Common Future (WECF)