

Practical recommendations for public officials' interaction with interest representatives

Correspondence - 24/05/2017

Case SI/7/2016/KR - **Opened on** 26/05/2016 - **Decision on** 27/06/2019 - **Institution concerned** European Commission |

DO

1. Check whether interest representatives have to be registered in the **EU Transparency Register** before meeting them or accepting an invitation to an event.
2. Prepare well and conduct basic research to check what interests they represent and **who is funding them** . Ask for further information, if needed.
3. Ensure that they disclose, in advance, the **meeting purpose/issue** for discussion, names of participants and the organisations and/or clients on whose behalf they act, as well as any other relevant information.
4. Assess and avoid any **risk of conflicts** between your private interests and the public interest and think about how your interaction might be perceived.
5. **Stop and reflect** on how to proceed, if you are in doubt. If necessary, consult your management and if it is decided that you should go ahead, add a note to the file explaining why.
6. Be aware that not all interest representation takes place in a formal setting. Lobbying can also take place during casual encounters and in **social settings** . Remain professional at all times.
7. Maintain good **record keeping** habits, including the meeting date/location, names of participants, organisations and/or clients, and issues discussed. Use your organisation's official file management system.
8. Respect the applicable **disclosure requirements** , for example in the Commission, disclose details of meetings between interest representatives and Commissioners, Cabinet members and Directors-General.



9. Report lobbying practices considered unacceptable in particular in light of the EU Transparency Register's **Code of Conduct** for interest representatives.

10. Familiarise yourself, for example via **training** , with the specific rules that apply to your own organisation. When the specific rules diverge from these practical recommendations the former should normally take precedence.

DON'T

1. Meet interest representatives not registered in the **EU Transparency Register** if your own rules disallow or discourage this; please ask the representative to register if their activities fall within its scope.

2. Overlook the **motives** of those who seek meetings or invite you to events. Lobbying is done by a range of organisations, including consultancies, law firms, NGOs, think-tanks, grassroots campaigns, ...

3. Interact with a particular interest representative without considering offering **other groups** a similar opportunity.

4. Accept any invitations to meetings or events, which could put your organisation in a **compromising situation** .

5. Forget to **debrief** relevant colleagues and your management after meetings and events.

6. Accept or arrange meetings **outside office hours** and official premises. If you do, consider informing your management and involve another colleague.

7. Do or say anything that could be viewed as granting an interest representative **preferential treatment** .

8. Give the impression to an interest representative that any particular advice, idea or information could or will be **decisive** in the decision-making process.

9. Share information you are **not authorised** to share or misuse confidential information.

10. Accept **hospitality** from an interest representative without careful consideration and unless it is in line with the applicable rules. Where necessary, report information on any gifts and hospitality received.