

## ZINCK Caroline

---

**From:** Nadja Salson [REDACTED]  
**Sent:** 30 August 2014 16:01  
**To:** Euro-Ombudsman  
**Subject:** [EOWEB] Own enquiry EC expert groups  
**Attachments:** EPSU responseOmbudsmaninquiryexpertgroups.docx

### Sender

---

**Sender** Nadja Salson [REDACTED]  
**Date** Saturday, August 30, 2014 4:01:01 PM CEST

### Your data

---

#### Part 1 - Contact information

<b>First name</b>	Nadja
<b>Surname</b>	Salson
<b>Gender</b>	Female
<b>E-mail address</b>	[REDACTED]
<b>Language you would like to receive an answer in</b>	en - English
<b>Other language you would accept an answer in (if applicable)</b>	fr - français

#### Part 2 - Data

**Subject** Own enquiry EC expert groups  
Dear Ms O'Reilly,

On behalf of EPSU, the European Federation of Public Service Unions, please find attached our contribution to the own-initiative inquiry on the composition of the European Commission's expert groups.

Do not hesitate to contact me should you need additional information [REDACTED]

**Content** Kind regards  
Nadja Salson  
EPSU policy officer  
Rue Joseph II 40  
1000 Bruxelles  
T 0032 2 250 10 88

## **OMBUDSMAN OWN INITIATIVE INQUIRY INTO EC EXPERT GROUPS**

### **EPSU response (30 August 2014)**

*EPSU is the European Federation of Public Service Unions. It is the largest federation of the ETUC and comprises 8 million public service workers from over 250 trade unions organising the sectors of energy, water and waste, health and social services and local, regional and central government. More information <http://www.epsu.org>*

EPSU very much welcomes the Ombudsman's own-initiative inquiry in the composition of EC expert groups with a view to encouraging and supporting efforts towards achieving a more balanced composition of these groups.

We, together with transparency organisations, have raised a number of times over the years with the Commission as well as the European Parliament that it is not acceptable that business is systematically and overwhelmingly represented in EC expert groups. Also, the large number of groups is in itself a problem.

Our below response mirrors the one put forward by the ETUC and/or affiliates.

**1. Which specific Commission expert groups do you consider to lack a balanced representation of relevant areas of expertise and interest in their membership? What, according to you, is the root cause of the unbalanced composition of the Commission expert groups identified by you?**

Expert groups – particularly economically and politically important ones – continue to be dominated by corporate interests, in a large number of cases occupying well over 50% of membership.

This contravenes one of the four conditions set by Parliament when it lifted the expert group budget freeze in September 2012 stating that no stakeholder should have a majority of the group seats<sup>12</sup>.

As far as trade unions are concerned, they are clearly underrepresented or not represented at all. It is important to highlight that, in line with the EU treaties, in addition to the obligation to consult EU social partners, the European Commission organises and administers sectoral and cross-sectoral social dialogue committees on the principle of *completely* balanced numbers between trade unions and employers. Yet the Commission falls short of applying the same principle in its expert groups.

The following groups were all created since the budget reserve was lifted in 2012 and all lack balanced representation and exclude trade union representatives:

Expert Group on agricultural commodity derivatives and spot markets; Expert Group for Bio-based Products; European Unique Device Identification (UDI) Commission Expert Group; Data Retention Experts Group; Expert Group on a European Insurance Contract Law; Expert group for the evaluation of the overall performance of the European Innovation Partnership (EIP) concept and

---

<sup>1</sup> Many examples are taken from the November 2013 ALTER-EU report 'A Year of Broken Promises', which focuses on groups created between September 2012 and September 2013, with additions from supplementary research. The figures were to our best knowledge correct at time of researching the report, and any changes since September 2013 are not included (e.g. the Stoiber Group was updated between September and November 2013).

<sup>2</sup> The four conditions set by Parliament are: 1. no corporate domination of Groups; 2. no lobbyist sitting in Groups in a 'personal capacity' (i.e. pretending to be independent); 3. public calls for application for all new Groups; 4. full transparency.

approach; Expert Group on Intellectual Property Valuation; Expert Group on Retail Sector Innovation; Expert Group on Open Innovation and Knowledge Transfer; Expert Group on a Debt Redemption Fund and Eurobills; VAT Expert Group; EU VAT forum; High Level Group on the Future use of the UHF band; Community of Practice for Better Self- and Co- Regulation; Expert Group on the Review of the International Accountancy Standards Regulation.

The following groups (as of September 2012) include trade union representatives but have more than 50% of corporate representatives:

High Level Group on Business Services, CARS 2020 Expert Group (& 4 subgroups), KETs High Level Commission expert group (& subgroup), High Level Group on Administrative Burdens, Platform for Tax Good Governance, Aggressive Tax Planning and Double Taxation, Strategic Policy Forum on Digital Entrepreneurship, High Level Group on Retail Competitiveness.

DG ENTR also formed an 'informal' Working Group for Technical Advice, parallel to the existing 'non-road mobile machinery' expert group, with the mandate "advising the commission in drafting the new legislative proposal". This new informal group was completely industry dominated and undercut the ongoing work of the existing expert groups. When civil society groups complained, DG ENTR closed the group and claimed it was never an expert group.

For more details, please see annex 1 that encloses a non-exhaustive list of EU Commission expert groups created since September 2012, compiled by Corporate Europe Observatory. The list shows that in each of the groups corporate organisations have a large majority of seats; in contrast the trade union representation (as highlighted in the table) is either absent or never exceeds 14% of the seats.

The root causes of corporate dominance are:

- an institutional culture within the European Commission that privileges corporate interests;
- the lack of diversity in backgrounds of Commission officials and internal experts;
- the lack of knowledge and in some cases blatant ignorance of industrial relations matters and EC own obligations on social dialogue;
- the disparity in both human and material resources between trade unions and civil society organisations and those representing corporate interests;
- The proliferation of expert groups that we fear bypasses EU institutions and undermines EU decision-making process and public scrutiny.

Unfortunately the prevailing view is one in which corporate interests are equated with public interests.<sup>3</sup> This bias can also be seen in the unwillingness of the Commission to tackle the problem of privileged access when highlighted by the Parliament or civil society, as well as an unwillingness to put effective rules in place to ensure the public interest is met, let alone enforce existing ones. Even though the different DGs have taken different approaches, the Secretariat General – which oversees all expert groups – has refused to see the domination of corporate interests as a problem.

A lack of transparency regarding which interest members represent (see answer to question three)

---

<sup>3</sup> Ironically, the short-termism that results from share-holder pressure and corporate governance structures mean corporations are undermining their own long-term interests which are served through sustainable social, environmental and economic policies that provide the environment within which they can operate.

allows the Commission to continue creating groups that give undue influence to corporate interests. The Commission shows nepotism in involving the same people, groups and associations again and again to become part of its expert groups.

The Commission's bias towards corporate interests is feeding growing public disillusionment with the EU and its perception of the EU as a business machine that takes no interest in public concerns. This widespread institutional culture is unacceptable and must change.

Another reason is the lack of internal expertise which means the Commission invites corporate interests to provide so-called technical advice (assuming that vested interests can be detached from technical expertise). However, collecting expert opinion (which is by its nature subjective rather than objective) does not have to equate to allowing all experts to take part in the drafting of reports or recommendations, or decision-making process. If Expert Groups are very influential at the early stages of policy making, therefore the political aspect (i.e. decision making) needs to be held by a group representative of all stakeholders, including SMEs, trade unions and other parts of civil society if the outcome is to be in the public rather than narrow commercial interest. The Commission often looks at issues too narrowly and fails to acknowledge social, environmental impacts. Only by representing *all* these interests, in balanced numbers, can its expert groups ever be truly representative and work in the public interest.

Given the large number of Expert Groups, the often large size of membership, and the disparity in resources between big business compared to others, it is no wonder there are more corporate members. Corporations have not only the resources to fund a staff member's involvement they are also often supported by the additional participation in the same groups of their linked or related trade associations and business lobbies. As trade unions and civil society organisations have more limited human and material resources, they cannot participate on an equal footing with business representatives. This problem is further compounded by the large numbers of expert groups.

**2. The Commission's horizontal rules on expert groups allow for the Commission to appoint individual experts in their personal capacity. In your experience, does this possibility give rise to concern in terms of the balanced composition of expert groups and/or conflicts of interest?**

#### Personal Capacity

The European Parliament called for no lobbyists or corporate executives to be sitting in expert groups in a personal capacity. EPSU would go further and call for the abolition of this category.

As the Commission considers those in a personal capacity to be independent and not representative of an interest, they are therefore excluded from any calculations on composition. This would be less problematic if the individuals were in fact independent experts or academics without corporate ties, but unfortunately the label 'personal capacity' has often been used for individuals who represent an interest (lobbyists). Indeed, many academics' departments and/or universities receive funding and have strong ties to the corporate world. Having lobbyists sitting in groups in a personal capacity can mean that advice the Commission may have believed was independent can in fact represent a particular interest and therefore strengthens that voice within the group. The Commission should appoint experts in a representative capacity with the required legitimacy and accountability to respond to the issues at hand.

## Conflict of interest

Much of the above stems from an institutional attitude where potential conflicts of interest are not seen as problematic because the individuals themselves are unduly trusted to act independently in the public interest. This is damaging on two levels: firstly (as mentioned above) it gives privileged access to certain stakeholders – who are not thoroughly checked or vetted- that can lead to the capture of public policy making. Secondly, it undermines the public reputation of the European Commission, which is supposed to be both transparent and above suspicion in the way it forms policy in the public interest. More robust selection and monitoring procedures of members is required.

The Commission's response that the problem is merely administrative – i.e. mislabelling of individuals in a personal capacity rather than as a 'representative of an interest', is hardly an excuse, and merely highlights the pervading culture within the Commission (that of seeing growth, particularly of big business, as the single most important goal) whilst failing to recognise the vested interest that may be held by the individual expert, nor how that interest may not be compatible with the public interest. Put bluntly, it seems the Commission does not want other considerations, such as socio-economic or environmental, to be allowed to get in the way of an internal market that serves commercial and business interests. In this way, trade unions and other non-corporate interests are seen as a problem, rather than part of the solution. Please see annex 2 for example of groups.

**3. Do you consider that the current level of transparency regarding the composition of Commission expert groups, in particular through the Register of Commission Expert Groups and Other Similar Entities, is sufficient? In particular, does the information made available by the Commission allow you to ascertain which interests are represented by the members of Commission expert groups? If not, where do you see room for improvement? Do you consider that the current level of transparency regarding the work of expert groups, in particular through the publication of agendas and minutes, is sufficient?**

The current level of transparency regarding the composition of Commission expert groups, in particular through the Register of Commission Expert Groups and Other Similar Entities, is insufficient. In particular, the following problems regarding opacity of interests can be identified:

- The Register does not make clear the balance between stakeholders. In the 'Statistics' section it notes the number of types of members, e.g. personal capacity, organisation, but fails to mention numbers of members representing specific interests, which would give the public an ability to judge.
- Giving overall figures for interests represented would only work if organisations (and individuals) were properly labelled. There is currently great inconsistency among DGs and even within DGs as to which interest certain organisations belong. The Register has the 'category' field, within which 'NGO', 'Trade Union', 'Association' etc. is filled out, but this is rarely consistent or accurate. For example, among groups created between September 2012 and 2013, more than 80% of organisations representing corporate interests were not labelled as such, with the worst culprits being TAXUD (who labelled most corporate interests 'Associations'), and DG AGRI (who labels all stakeholders NGOs)<sup>4</sup>. Clear and accurate labelling of various groups (business, trade union, social NGO, environmental

---

<sup>4</sup>ALTER-EU, 2013, A Year of Broken Promises, available at [http://www.alter-eu.org/sites/default/files/documents/Broken\\_Promises\\_web.pdf](http://www.alter-eu.org/sites/default/files/documents/Broken_Promises_web.pdf)

NGO, academic) needs to be systematised for expert groups across all DGs, which could be done by linking their entry to the transparency register, as well as giving the public more information on the overall interests and lobbying activities of members. Furthermore, we believe that identifying the individual representative capacity of organisations currently lumped together as “civil society” is vital to show more visibly the make-up of expert groups and any discrepancy or imbalance in members’ number and influence. Expert group members should be publicly listed according to their various interests and representative roles, to ensure full transparency and allow the public to see clearly which expert groups are balanced and which are still riddled with disparities.

The labelling of individuals is also problematic:

- In light of the above, if an individual attends in a personal capacity, which should not be allowed (see comment above), then a clear declaration of interest (DOI) should also be published. Academics and independent experts must include information on any employment or funding they or their department, institution or organisation receive from corporate or commercial interests. This DOI should be thoroughly vetted and assessed by the Commission and then monitored and updated regularly so as to ensure the independence of the individual expert. If it transpires that there are interests which the member has not declared, a fitting sanction (e.g. a ban for the individual and organisation from all groups for a set period of time) should be levied to ensure it works effectively as a mechanism.
- When an individual does not sit in a personal capacity, i.e. a representative of an interest, then all information on that individual and which interest they represent should be made clear, which is currently not the case. This should firstly include which stakeholder group they represent (rather than which industry sector they have expertise in), who they work for and which organisations they have commercial ties to, e.g. board memberships. This would allow the public to be confident of who they represented and allow a more comprehensive assessment of group composition. This was also called for by the European Parliament when demanding full transparency.

The practice of publishing minutes and agendas on line is improving, however more improvements can be made:

- Minutes and agendas should be added to the register additionally to linking them to another website.
- Agendas should be placed on line *before* a meeting, not afterwards.
- Minutes of a meeting should be placed on line as promptly as possible
- The minutes should clearly show which stakeholders or groups of stakeholders have agreed or not (including minority views) or proposed which views, in order to allow the public a clear idea of which interests are pushing for what. There is no agreement of secrecy within the Commission, and all DGs should have to do this – despite some such as TAXUD protesting. Additionally reports and research concerning the discussions in the Expert Groups should be made public.

And on the expert group meetings themselves:

- The Chatham House rules, which operate in some expert groups, for example the Platform for Tax Good Governance, run counter to the principle of transparency the Commission claims it wants to promote, and should be removed. The rules make absolutely no sense for expert groups composed of individuals who represent their respective organisation, as is the case for the Tax Platform. Besides, it is ironic that experts on fighting tax fraud and

avoidance would be bound by rules on secrecy, a key driver of tax fraud and corporate tax avoidance. The length and frequency of speaking time must also be closely monitored and regulated to allow for a full balance of views to be expressed.

**4. Where the Commission publishes calls for application for membership in expert groups, do you consider that these calls provide for selection criteria which sufficiently take into account the need for a balanced composition of expert groups? If not, where do you see room for improvement? In your view, could the Commission do more to raise awareness about these calls, with a view to encouraging applications? If so, what concrete steps could it take in this regard?**

The selection criteria within calls are often broad enough to justify the selection of any member. However, the Commission leans too much towards business, commercial and technical expertise, and does not give the same weight to socio-economic and environmental considerations. Furthermore, while mentioning all stakeholders within the call, as well as the need for balance, often a lack of definition of what balance means can make it difficult to hold the Commission to account. It should be explicit that full balance is needed between commercial and non-economic actors as well as between social partners, and it should be clearly stated - as the European Parliament has demanded – that no single stakeholder should have a majority of seats.

Ensuring diversity across stakeholders should go beyond stating it in the call for applications as it has proven to be ineffective. For example, the call for the *Platform for Tax Good Governance, aggressive tax planning and double taxation* stated the need for diverse stakeholders with a view to strike a balance between different interests and for “international, preferably European level representatives”. Yet, of the 15 expert seats, the EC appointed five closely-linked employers federations including national members (the International Chamber of Commerce and its American branch; BusinessEurope and its German and French members, BDI and MEDEF respectively); four closely-linked accountancies (Confédération Fiscale Européenne joined by its Dutch member, the Fédération des Experts Comptables Européens joined by its UK member); three NGOs (Christian Aid, Oxfam and CIDSE) and the tax justice network; and initially only one trade union, the European Federation of Public Service Unions (EPSU) out of the four ETUC linked applications - another union not linked to the ETUC was appointed in replacement of Tax Justice Network. The matter was raised with the European Parliament, Commission as well as the Ombudsman. The point here that there should be an equal number of trade union representatives and employer or employer-linked representatives – in this case, it is 5 to 2. We therefore expect the Commission to either increase the number of trade union representatives or reduce the number of employer/business representatives.

There is no agreed period for calls for applications, which is a problem in itself. In our view, it should be set at six weeks to allow organisations with wide membership, such as the ETUC or EPSU, to consult with their members. The Commission has the duty to advise key stakeholder groups, and pre-call notices should be published on DG and wider EU Commission websites, as well as all members of the transparency register. Ideally the establishment of expert groups should be announced as part of the Commission’s broader policy initiative; this was, for instance, the case for the *Platform for good tax governance* creation of which was pre-announced in the EC Action plan against tax fraud and avoidance.

Currently call publications are not visible enough. But for this to be effective, other complementary steps should be taken that ensure a wider pool of experts is reached, for example: using social

media; targeting specific sectors through trade magazines and websites; asking civil society organisations active in the field to publicise it among their networks; identifying areas where there are fewer applicants and reaching out in a more targeted way. The Commission should also raise awareness of upcoming calls for applications amongst its various stakeholder interest channels, including through its sectoral and cross-sectoral social dialogues with social partners. In the social field the social partner should be informed directly and automatically.

**5. Do you have any experience in applying for membership in a Commission expert group? If so, did you face any problems in the application process? If not, are you aware of any such problems faced by civil society organisations?**

**Based on your experience, do the costs inherent in participation/the lack of comprehensive reimbursement schemes discourage civil society organisations from applying for membership?**

Please see the response by the ETUC and affiliates that provide examples. We hereby limit our contribution to our experience as member of the Platform for *Tax good governance, aggressive tax planning and double taxation* established in June 2012 composed of the 28 EU government representatives and 15 experts.

Whilst in this group there is a higher representation of civil society than in many other expert groups, the overall composition remains unbalanced in favour of corporate interest. Of the four ETUC backed applications, only EPSU was accepted. Earlier this year, another European trade union, not linked to the ETUC, joined the group in replacement of tax justice network. This did not however alter the balance of the group's composition.

As the EPSU representative and alternate are based in Brussels, the refund of travel expenses has not been an issue. However, the overrepresentation of corporate interests coupled with their larger human and material resources have worrying practical implications. They invite additional staff to make presentations on specific issues. They can send both their representative and alternate members, the latter taking the floor to reinforce the interventions of the former. Trade unions and social NGOs do not have the human resources to do the same. The length and frequency of business interventions at meetings are also obstructing good progress with the mandate of the platform which is to help implement the EC action plan against tax fraud and evasion. This is perhaps not surprising given that the Platform corporate members have no public records on fighting tax fraud and corporate avoidance. After 1 year of meetings, sadly little tangible progress has been made as a result.

In addition, we wish to report that since the establishment of the platform, two more groups dealing with some of the Platform topics have been or are about to be established, i.e. the digital economy tax high level group and a group on automatic exchange of tax information.

**6. Please give us your views on which measures could contribute to a more balanced composition of Commission expert groups.**

#### Recognition of the problem

The Commission needs to first recognise that corporate-dominated Expert Groups are not acceptable and reform the horizontal rules to ensure not a single interest group has a majority – as demanded by the European Parliament. There are some positive examples:

- DG ENTR has pledged to stop creating groups in which corporations have more than 50% of the seats (although it is yet to translate in practice)



- DG AGRI's decision for its new 'Civil Society Groups' to complement the Common Agricultural Policy explicitly mentions balance between economic and non-economic actors and a balance between stakeholders (although this has since been undermined through aggressive industry lobbying).<sup>5</sup>
- DG EAC believes its Erasmus Mundus Expert Group is balanced because “no single interests (business, trade union or otherwise) has a majority of the non-government and non-EU seats in the group”.<sup>6</sup>

But in order to assess composition, full transparency is needed regarding classification of interests and declarations of interest, which should be included in the new horizontal rules. This would prevent the Commission from making false claims a balanced composition.

### Responding to capacity limitations

If the difference in capacity makes it impossible to ever have enough civil society actors and trade unions for a balanced composition (as DG ENTR has experienced when trying to attract more civil society actors), then the number of other stakeholders should be reduced or the groups concerned abolished. The fear of losing expertise can be overcome through the Expert Group concerned by inviting experts for a hearing or to submit a paper, rather than giving them a permanent seat. This is an approach taken by the World Health Organisation's International Agency for Research on Cancer (IARC).<sup>7</sup> Equally, as the Commission continues to point out when civil society asks for greater representation, there are other channels for expertise and opinion to be collected, such as through consultations.

The European Commission should not forget that there are formalised ways of gathering expertise, such as the Social Dialogue or other forms of formal consultations of the social partners. This also requires regular training of EC officials on EU social dialogue process and related consultations.

Further, the European Economic and Social Committee puts together employers, trade unions and civil society groups. These structures and institutions need reinforcing rather than developing further new expert groups which will also contribute to saving public money.

### Horizontal rules

The current horizontal rules on Expert Groups are too weak as their application differs among the EC DGs which makes it difficult to keep an overview of all the groups. It is vital to have universal, clear and transparent rules on the composition and the application as well as the mandate of Expert Groups, as demanded by Parliament. Arrangements for covering expenses and allowances for expert group members, including for ad-hoc additional presentations by experts who are not members of the group, should also be consistent or this could influence the ability of members (particularly trade unions and NGOs) to participate. These rules need to apply horizontally to all Expert Groups and need to aim at a balanced composition of the Groups. The establishment of expert groups must be done on the basis of open calls for participation, transparent and objectively verifiable selection of experts against the call for application, and ensuring that balance of representation applies.

<sup>5</sup><http://corporateeurope.org/expert-groups/2014/01/will-public-trust-eu-be-sacrificed-keep-agribusiness-happy>

<sup>6</sup>Education and Culture, May 2012, Review of Expert Groups, accessed as a result of a freedom of information request, available at [http://www.asktheeu.org/en/request/review\\_of\\_expert\\_groups#incoming-1328](http://www.asktheeu.org/en/request/review_of_expert_groups#incoming-1328)

<sup>7</sup>David Michaels, 2008, Doubt is their Product, Oxford University Press, p. 255-57

We call on the Ombudsman to recommend the Commission to conduct a thorough review of the expert group horizontal rules in 2015 with a view to integrate the findings of its own inquiry.

### Fewer expert groups

It appears that the reduction of the number of expert groups is unavoidable which in turn would make them more manageable and allow organisations with fewer available resources, such as trade unions and NGOs, to participate more proactively in them all.

### **7. Do you have any other comments?**

Please see the response by the ETUC or affiliates.

### Annex 1

DG	Group name	Members	Composition of interests / Reason lacks balanced representation
AGRI	Expert Group on agricultural commodity derivatives and spot markets	16	94% corporate interests; 6% farmers – no civil society interest with knowledge on food speculation
ENTR	High Level Group on Business Services	19	74% corporate interests; 11% academia; 5% NGO; 5% SME; 5% trade union
ENTR	CARS 2020 Expert Group (& 4 subgroups)	80 (16x5)	63% corporate interests (ALTER-EU classified the International Motorcycling Federation as corporate due to its funding and corporate events); 25% NGO; 13% Trade Union
ENTR	KETs High Level Commission expert group (& subgroup)	64	59% corporate interests; 25% Hybrid; 9% Academia; 3% SME; 3% Trade Union.
ENTR	Expert Group for Bio-based Products	26	58% corporate interests; 19% academia; 19% Hybrid; 4% NGO
SANCO	European Unique Device Identification (UDI) Commission Expert Group	17	64.5% corporate interests; 23.5% professional association; 6% Hybrid; 6% NGO.
HOME	Data Retention Experts Group	7	100% corporate interests
JUST	Commission Expert Group on a European Insurance Contract Law	20	55% corporate interests; 20% academia; 5% hybrid; 5% NGO; 5% other; 5% professional association; 5% SME
RTD	Expert group for the evaluation of the overall performance of the European Innovation Partnership (EIP) concept and approach	5	80% corporate interests; 20% other
RTD	Expert Group on Intellectual Property Valuation	10	80% corporate interests; 20% academia
RTD	Expert Group on Retail Sector Innovation	11	64% corporate interests; 36% academia
RTD	Expert Group on Open Innovation and Knowledge Transfer	12	58% corporate interests; 25% academia; 17% hybrid
SG	Expert Group on a Debt Redemption Fund and	10	70% corporate interests; 20% academia; 10% hybrid

	Eurobills		
SG	High Level Group on Administrative Burdens <sup>8</sup>	15	60% corporate interests; 20% NGO; 13% SME; 7% trade union
TAXUD	VAT Expert Group	42	86% corporate interests; 5% NGO; 5% professional association; 2% academia; 2% SME
TAXUD	EU VAT forum	15	80% corporate interests; 13% professional association; 7% SME
TAXUD	Platform for Tax Good Governance, Aggressive Tax Planning and Double Taxation	15	59% corporate interests; 20% NGO; 7% academia; 14% trade union ( 7% in 2013)–.

---

<sup>8</sup>The Commission has since altered this group. Please see letters from the Secretariat General to the European Parliament regarding the new composition

**Other groups created since September 2012 (n.b. in no way exhaustive)**

<b>DG</b>	<b>Group name</b>	<b>Members</b>	<b>Composition of interests / Reason lacks balanced representation</b>
CNECT	High Level Group on the Future use of the UHF band	20	70% corporate interests; 20% public sector; 5% NGO
CNECT	Community of Practice for Better Self- and Co-Regulation	50	68% corporate interests; 16% hybrid; 8% academia; 6% NGO; 2% other
ENTR	Strategic Policy Forum on Digital Entrepreneurship	31 (OECD = gov)	70% corporate interests; 13% academia; 7% SME; 3% hybrid; 3% NGO; 3% trade union
MARKT	High Level Group on Retail Competitiveness	20	85% corporate interests; 5% academia; 5% NGO; 5% trade union
MARKT	Expert Group on the Review of the International Accountancy Standards Regulation	10 (excluding gov)	90% corporate interests; 10% SME

## Annex 2

DG	Group Name	RoI/PC <sup>9</sup>	Names and reasons
AGRI	High Level Steering Board for the European Innovation Partnership	2/10	[REDACTED]
BEPA	Science and Technology Advisory Council	7/15	[REDACTED]
CNE CT	Young Advisors Expert Group on implementation of the Digital Agenda for Europe	20/25	[REDACTED]
CNE CT	Community of Practice for Better Self- and Co- Regulation	10/15 (excl gov)	[REDACTED]

<sup>9</sup>Members appointed in their personal capacity when in fact they should be a 'Representative of an Interest' compared to total number of members appointed in their Personal Capacity: RoI/PC

			<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
SAN CO	Expert Panel to provide advice on effective ways of investing in health	1/11	<p>[REDACTED]</p>
HOM E	Data Retention Experts Group	1/1	<p>[REDACTED]</p>
JUST	Commission Expert Group on a European Insurance Contract Law	1/7	<p>[REDACTED]</p>
RTD	EU Bioeconomy Panel	8/24	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

			<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
RTD	Expert Group on Retail Sector Innovation	7/11	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

			<div></div> <div></div>
RTD	Expert group for the evaluation of the overall performance of the European Innovation Partnership (EIP) concept and approach	5/5	<div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div>
RTD	Expert Group on Intellectual Property Valuation	8/10	<div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div>
RTD	Expert Group on Open Innovation and Knowledge Transfer	9/12	<div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div>





				<div></div> <div></div> <div></div> <div></div> <div></div>
SG	High Level Group on Administrative Burdens	1/1		<div></div> <div></div>
TAXU D	VAT Group	Expert	26/28	<div></div>