



To the Members of the  
European Parliament

Brussels, 11<sup>th</sup> April 2014

**Re: Vote on the Transparency Register: maintain the exemption of local and regional authorities from the scope of the register**

Dear Member of the European Parliament,

I am writing to you regarding the vote on the report on the modification of the inter-institutional agreement on the Transparency Register (rapporteur Roberto Gualtieri), which will take place in the Plenary session on Tuesday, 15<sup>th</sup> April, following the debate on Monday, 14<sup>th</sup> April.

The Council of European Municipalities and Regions (CEMR) is the broadest European umbrella organisation representing local and regional government in 40 countries. We regret that local and regional government representatives were not involved in the consultation about the modification of the Transparency Register, and therefore want to present our view in writing.

Our main concern is that the report no longer foresees the exemption of local authorities from the scope of the transparency register, which means that cities, municipalities and counties would be treated like any other enterprise or company. However, contrary to these, local and regional authorities and their representative organisations represent the public interest and not interests of a particular company. Their representatives are democratically elected mayors and presidents and have the legitimacy to represent the sub-national level in the multi-level governance system that the European Union promotes. The recognition of regional and local self-government (article 4), and the introduction of an “open, transparent and regular dialogue with representative associations and civil society” (article 11) in the Lisbon Treaty grants them a different role.

Therefore, we strongly urge you to **make a distinction between representations of local and regional government and companies or enterprises**, and to keep the exemption from the scope of the Transparency Register, by reintroducing the wording of paragraph 7(b) of the current decision of the European Parliament of 11. May 2011 ((P7\_TA(2011)0222) on the conclusion of an inter-institutional agreement between the European Parliament and the Commission on a common Transparency Register:

**7 (b) (...) local, regional and municipal authorities (including representations forming part of their administrations); in view of these bodies' institutional role under the Treaties (...) do not come within the scope of the register.**

In light of previous helpful contacts, we would be grateful if you could take our views into consideration.

We remain at your disposal should you have any further questions.

Yours sincerely,

A handwritten signature in black ink, reading "A. Poth-Mögele". The signature is written in a cursive style with a large initial 'A' and a long, sweeping underline.

Angelika Poth-Mögele,  
Director of Policy