REGISTRE DES REPRÉSENTANTS D'INTÉRÊTS
DOSSIER DE SUVI D'UNE PLAINTE

OUT OF SCOPE
Examination of the complaint

BP estimated its costs directly related to interest representation to EU institutions in the financial years 2008 and 2009 to lie between 400,000 - 450,000€.

In the informational meeting on the 28th of October 2010 BP provided the European Commission with its methodology of calculating its estimated costs which are directly related to representing interests to EU institutions. BP thereby showed the logic behind their declaration.

Some of this information given in the meeting was additionally sent per e-mail by Mr. Gunnar Jungk on the 5th of November 2010.

BP took the full year 2008 actual expenses and scanned the activities of the permanent Brussels based BP staff as well as visiting staff working at their office on the basis of electronic diaries. BP developed a percentage for the time and costs related to "direct lobbying of the EU institutions" (e.g. meeting with EU officials) by tagging all the relevant activities. This percentage (% of the working time of the entire team) was then applied to
the total salary costs, office lease costs, travel and entertainment, as well as the overall administrative budget. BP excluded payments to third parties such as trade associations, think tanks or consultancies which, in their understanding, will be accounted for by the organisations concerned.

BP pointed out that since it wanted to report the actual costs, they based their estimations in 2008 on the 2008 budget and analyses of the first half 2008 actual expenditures. This information was then updated in November 2009 by estimations based on the actual expenditures of the full year 2008.

However, BP stressed itself that since it wishes to communicate estimations based on actual expenditures and because their annual update takes place in November, BP is not able to declare a figure for the current year until nearly a year later. Therefore, BP is considering an update in early 2011 on the basis of actual 2010 expenditures and will then report thereafter on this reporting anniversary rather than in November.

OUT OF SCOPE
Concerning relations with third parties and BP's memberships, BP emphasised that it aimed to act in a transparent manner on this point by listing ten different bodies they have relationships with and by saying explicitly in their declaration that their estimates do not include payments to third parties such as trade associations, think tanks or consultancies in order to avoid double-counting.

Furthermore, BP's logic behind declaring some memberships and not other (e.g. CEFIC, Friends of Europe) was based on whether this was considered a core membership in terms of time and resource commitment. This is a matter of judgement and may be revised from time to time in the light of circumstances.

Conclusions

OUT OF SCOPE
BP's estimation of costs directly related to representing interests to EU institutions started from the full year 2008 actual expenses of its EU Liaison office and a scanning of the activities of its permanent Brussels based staff as well as visiting staff working at their office on the basis of electronic diaries. BP calculated a percentage for the time and costs related to "direct lobbying of the EU institutions" which was then applied to the total salary costs, office lease costs, travel and entertainment, as well as the overall administrative budget. BP deducted payments made to third parties such as trade associations, think tanks or consultancies whose names figure in BP's register entry.