For 2008, BUSINESSEUROPE estimate their costs directly related to representing interests to EU institutions as 550,000-600,000€. BUSINESSEUROPE is a European coalition of employers' organisations and represents more than 20 million small and large companies. About 45 permanent staff work in the Brussels headquarters; their task is to ensure that the views of European employers regarding the impact of proposed EU legislation on enterprise are considered as legislation is decided (from BUSINESSEUROPE website). In other words, it is the task of the permanent staff to LOBBY EU policy-makers.

In their registration, BUSINESSEUROPE should therefore calculate the salaries of their professional lobbyists into their expenditures directly related to representing interests to EU institutions. We believe it is unrealistic that BUSINESSEUROPE spent less than 600,000€ on salaries for their 45 staff, even if support staff's salaries are not fully counted.

But there seem to be more lobbying expenses missing from the calculation. In order to paint a realistic picture about the sums spent to influence policy-making, costs which should be attributed to lobbying are e.g.:

- Organising or sponsoring events that bring together representatives of the EU institutions and of interest groups/organisations/companies with the purpose of influencing EU policy formulation and decision-making. BUSINESSEUROPE organises a range of these events, including e.g. the annual European Business Summit (EBS). The event's goal is “to set up a platform for dialogue between the business world and the European political scene” and “to enable SMEs to meet decision-makers face-to-face” - or in other words: LOBBYING. It is usually attended by many high level speakers from the Commission and other European institutions. Commissioner Kallas informed FoEE in a letter of February 9 2009 that he considers the EBS to fall within the scope of the Commission’s Register of Interest Representatives, so an event that should be factored into BUSINESSEUROPE’s lobbying budget. The EBS alone, including massive advertising, likely has a budget of more than 600,000€. For example, BUSINESSEUROPE expects 2,500 participants for its 2009 EBS, who are asked to pay 800-1,200€ registration fee. Other major events in 2008 included 'Going global: The Way Forward', 'Regions and companies: a question of partnership' and 'Ready, Steady, Service'.

- Similarly, costs made for publications and position papers that are produced specifically to influence EU policy formulation and decision-making should be calculated into the lobbying budget. The website of BUSINESSEUROPE displays a significant number of position papers and at least 9 printed publications in 2008, clearly produced for this purpose, for example ‘Going Global - The Way Forward’ and ‘Combating Climate Change’.

It seems very obvious that BUSINESSEUROPE has reported only a fraction of their actual lobbying budget in the Commission's register. Presumably, part of BUSINESSEUROPE's activities would be exempted from disclosure requirements based on their work as a
coordination office for their members, and on the Commission's own exceptions (e.g. activities as social partners or in response to Commission requests). However, even with these exceptions, it seems unlikely that the sum of 550,000€-600,000€ covers the lobby-related salary costs of 45 staff as well as the costs for organising several high-level conferences and a wide range of printed publications, or any of the related overhead costs (such as office rent and equipment, travel and costs for support staff).

In a letter dated January 28 FoEE asked BUSINESSEUROPE to clarify how their lobby budget was calculated and which items of expenditure it includes. So far we have not received any response. We therefore request the Commission to investigate the coherence and credibility of the BUSINESSEUROPE registration in the Register of interest representatives.

Clause(s) you think has/have been breached:
ensure that, to the best of their knowledge, information which they provide is unbiased, complete, up-to-date and not misleading;