28 October 2005

I am writing to make a proposal which I hope is helpful in advancing the cause of transparency and accountability which you have championed and which we support.

You have indicated that you would like to see professional codes of conduct of third parties made more comprehensive. We at EPACA believe this can be done if the Commission will support an agenda to establish a common core code of conduct for all those who engage in lobbying – public affairs consultants, management consultants and accountants, lawyers, NGOs, think tanks, corporates and trade associations.

Such a common code need not call into question more specifically tailored self-regulatory provisions of respective market segments (there are likely to be different detailed implementation arrangements for some of the players) but should rather establish clear basic principles for behaviour. A good starting point for such a common code, since it has the sanction of the only directly elected EU institution, would be the code set out in the European Parliament rules of procedure.

The above-mentioned groups could be gathered on initiative of the Commission to seek to agree such a common code, to establish a basis for commonly promoting best practice and ethical behaviour on the part of third parties in their relationships with the EU institutions, to set out the minimum criteria for effective self-regulatory provisions, and to be a partner of the Commission and others in moving the process forward. The body could be called the European Public Affairs Council.

As we understand you are planning a round table after the adoption of the Commission Green Paper, we hope this is an occasion where agreement along these lines could be a useful and practical outcome.

Should you or your staff think it helpful we would be happy to come and discuss the matter in more detail.
I am copying this letter to the Cabinet of President Barroso, the Cabinet of Mrs Wallstrom, and the Commission Secretariat General, as well as the Secretary General of the European Parliament. I have also written in similar terms to the Permanent Representative of the state holding the Council Presidency.

John Houston
Chairman