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## **RECOMMENDATION FOR THE CCBE MEMBER BARS REGARDING THEIR REGISTRATION IN THE COMMISSION'S REGISTER**

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**Conseil des barreaux européens – Council of Bars and Law Societies of Europe**

*association internationale sans but lucratif*

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## Recommendation for the CCBE member bars regarding their registration in the Commission's register

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The CCBE recommends in principle the same parameters for the CCBE member bars' registration as for the CCBE itself:

1. If CCBE bars and law societies decide to register, it is recommended that they should do so under the second category, subcategory two ("Professional organisations"). This is equally applicable to CCBE members with a public function for the reasons explained under III. Page 8 of this document.

Yet, it is recommended that CCBE member bars insert a comment for the Commission's review of the register. This comment should call for the introduction of a fifth category, for the liberal professions.

2. CCBE member bars should be aware of the fact that a Brussels office is not required in order to register.<sup>1</sup> If the activities of an organisation fall within the scope of interest representation as defined by the Commission, the organisation is invited to register even if its activities are directed from the Member State in which it is located.
3. It is recommended that CCBE members - despite a potential exemption from financial disclosure requirements - indicate figures on the budget specifically spent for direct lobbying. Direct lobbying in this context would mean lobbying in "stricto sensu" which would not include preparatory activities like legal monitoring, legal analysis, etc.

Furthermore, it is recommended that CCBE member bars avoid double-counting of reported costs of lobbying<sup>2</sup>. In this context, the ETI subgroup proposes that CCBE member bars do not list the CCBE's cost of lobbying when they indicate their own costs of lobbying.

4. With regard to the Code of Conduct, it is recommended that CCBE member bars for their political work in relation to the European Commission should adhere to the Commission's Code of Conduct.

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<sup>1</sup> (please see FAQ, page 2, Question 5) : We have no office in Brussels. Should we register anyway?

Yes, you should. The location of your office plays no role: if your activities fall in the scope of interest representation as defined by the Commission, you are invited to register.

<sup>2</sup> (please see FAQ, page 4, Question 11) (...) Every effort should be made to avoid double-counting of reported costs of lobbying. Such double-counting would occur if, for instance, an in-house interest representative had contracted a public affairs consultancy for a certain task, and both registrants included the cost in their disclosure. Similarly, trade associations lobbying on behalf of a group of companies might disclose amounts that were also entered by the individual companies. To avoid such double-counting, registrants are encouraged to agree with their partners and clients who reports what.