

**EPACA**  
**European Public Affairs**  
**Consultancies Association**

c/o Houston Consulting Europe  
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B - 1040 Brussels

Erik Wesselius  
Corporate European Observatory  
Paulus Potterstraat 20  
NL - 1071 DA Amsterdam

Brussels, 16 March 2005

Dear Mr Wesselius,

I am writing to you on behalf of the European Public Affairs Consultancies Association (EPACA) as a collective response to your circular letter of 3 February to several of our members.

EPACA is a new association of Brussels public affairs companies, formally launched on 28 January this year (list of the 26 member companies attached). It supplies a formal professional self-regulatory structure, and is an evolution of the work of the previous 'Code of Conduct Group' (sometimes referred to recently as Public Affairs Practitioners, including in a Commission letter to CEO).

This code of conduct, established now for 12 years and still the basis for all such codes in the Brussels marketplace, does we believe underpin our commitment to promotion of the highest professional standards among EU public affairs professionals. Its signatories enter into a public commitment to adhere to these standards, which comply with and in some respects exceed those required by the EU institutions.

Our position as an association is that members should adhere to our code, and general standards of ethical and honest behaviour. Our code requires professionals to identify themselves and their company clearly, to declare the interest represented, and not to misrepresent their status, during inquiries to or lobbying of EU officials and representatives. There is no requirement on them to supply details of such exchanges to other interest groups, or to publish lists of clients and/or lobbying budgets.

There is a legitimate discussion to be had about the appropriate levels of disclosure and registration by all interest groups involved in EU public affairs. Our members do not however feel that a bi-lateral dialogue with a single NGO or pressure group is the best way forward at this stage. The objective should be the ongoing evolution of broadly agreed rules for the interplay of interest groups and EU institutions, providing the framework for legitimate representations by all stakeholders. It appears that the European Commission wishes to promote a dialogue on this subject, and EPACA wishes to contribute to it in a constructive and transparent manner.

Yours sincerely,



John Houston  
*Chairman*