



Joint Transparency Register
Secretariat



Brussels,

Mr Joop Kiefte
President
Organisation Mondiale de la
Jeunesse Espérantiste (TEJO)
Nieuwe Binnenweg 176
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Sent only by email to:

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Ref.: TR-C-2019-96

Dear Mr Kiefte,

In follow-up to previous correspondence, the Joint Transparency Register Secretariat (JTRS) is contacting you as the President of *Organisation Mondiale de la Jeunesse Espérantiste* (TEJO), entered in the Transparency Register under ID number 099332335142-02.

As you are aware, the JTRS has investigated a complaint received on 5 September 2019 against TEJO, with the reference TR-C-2019-96, in line with Annex IV, Title II, of the *Agreement between the European Parliament and the European Commission on the transparency register for organisations and self-employed individuals engaged in EU policy-making and policy implementation* (the ‘Inter-institutional Agreement’).¹

To recall, the complainant alleged that TEJO had intentionally breached points a), b) and d)² of the Transparency Register Code of Conduct (the ‘Code of Conduct’).³

¹ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014Q0919\(01\)&from=en](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014Q0919(01)&from=en)

² ‘In their relations with EU institutions and their Members, officials and other staff, interest representatives shall:

- a) always identify themselves by name and, by registration number, if applicable, and by the entity or entities they work for or represent; declare the interests, objectives or aims they promote and, where applicable, specify the clients or members whom they represent;
- b) not obtain or try to obtain information or decisions dishonestly or by use of undue pressure or inappropriate behaviour;

The complainant claimed that TEJO had intentionally misrepresented itself on the Transparency Register by stating to have a significantly higher number of members than in reality (25 000 instead of approximately 500 members), thereby allowing it to fraudulently receive EU grants.

The JTRS asked TEJO for its position in response to the claims, and an exchange of emails followed. The JTRS underlined that the Transparency Register required registrants to provide a figure relating to formal membership and not to provide the number of persons that could potentially be reached via TEJO's various activities. In the course of the investigation, the JTRS suspended TEJO from the Transparency Register.⁴


You explained that TEJO's membership structure is complex, relying on individual members and members of 50 national branches across Europe and the world. The originally indicated number, it was claimed, was obtained by including these branches and based on their declarations and additional statistical estimations.

Ultimately, TEJO deleted the '25 000' number from its registration, instead providing a list of its members. The JTRS accepted this update of the data provided in the Transparency Register as a resolution of the complaint. Therefore, it has closed the complaint and lifted the suspension of TEJO's registration.

As to the complainant's claim that the inflated membership number allowed TEJO to fraudulently receive EU grants, it is to be noted that the JTRS is competent only to investigate suspected non-compliance with the Transparency Register Code of Conduct. However, the JTRS will proceed by informing the Agency responsible for the EU grants concerned of the complaint and of the resulting change in TEJO's membership information on the Transparency Register. It will then be up to this Agency to decide on the appropriate follow-up.

We would like to thank you for your cooperation during this procedure.

Yours sincerely,


of the Joint
Transparency Register Secretariat

c) [...]

d) *ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading; accept that all information provided is subject to review and agree to cooperate with administrative requests for complementary information and updates;*

³http://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=CODE_OF_CONDUCT

⁴ TEJO had, however, still access to its account and was able to modify data.