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Identifying centrality in the expert groups: transparency and the electronic registers.

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Abstract.

Based on the assumption that technology can deliver greater transparency and strengthen civil society, this paper explores the theoretical mechanisms through which differing types of transparency increase public confidence and legitimacy. By decoupling the two, the paper considers whether accountability is more effectively achieved through transparency or actual scrutiny.

The paper applies this question to the case of the Commission's expert groups. These groups advise at all stages of the policy process, from the preparation of legislative proposals to the monitoring of implementation. Acknowledging that the interplay between expertise and the public is a crucial part of policy making, the Commission's website hosts a register of these groups together with guidelines and rules on their composition and the information that should be made publicly available.

The paper tests whether the groups are complying with these rules in two aspects: gender makeup and the availability of relevant documentation. On gender, we find low levels of compliance with Commission guidelines whilst, on availability of documentation, there is wide variation across DGs. The paper argues that, for the expert groups, transparency is not sufficient to ensure compliance with regulations suggesting that a robust scrutiny process is needed to hold power to account.

Introduction.

From its earliest days, the EU has recognised that its use of expertise to assist the Commission with the shaping of policy presents a potential democratic shortfall, a point raised in Walter Hallstein's rhetorical question: 'How influential are the 'experts'? Are the so-called 'technocrats' all-powerful behind the scenes?' (Hallstein, 1972, p.56). More recently, the Commission provided a set of guidelines on its collection and use of expertise. These guidelines acknowledge that 'a better-informed public increasingly questions the content and independence of the expert advice' and aimed to facilitate 'the interplay between policy-makers, experts' and the public at large' (European Commission, 2012f, p.4). The document listed 'openness' as one of three 'core principles' governing the Commission's use of expert advice, stating that 'The Commission should be open in seeking and acting on advice from the experts'

Despite this stated commitment to openness, however, the guidelines acknowledged that in certain circumstances 'too much openness could be detrimental to the quality of advice' whilst adding, with a somewhat tortured logic, that 'it is important to be as transparent as possible about the *reasons for not being open*' (European Commission, 2002, p.10 - emphasis in original). It appears that, for the Commission, the terms *openness* and *transparency* are synonyms. This paper engages with the debate around the nature of transparency and its relationship to democratic participation before examining the publicly available information on the use of expertise in order to test whether the citizen access to information is sufficient to ensure regulatory compliance: in short, whether transparency without scrutiny is a sufficient means of holding power to account.

The nature of transparency.

Much of the transparency discourse tends to focus on the structure of transparency measures - the means through which agent *A* is able to observe the activities of agent *B*, for example - whilst perhaps not sufficiently reflecting the complex topography of the transparency landscape. Because the accountability relationship of agent *A* to agent *B* is ignored, distinctions between transparency, scrutiny and surveillance are blurred.

For Heald (2006), transparency operates across both vertical and horizontal planes with upwards vertical transparency representing the capacity of a hierarchical superior to observe the actions of a subordinate, whilst downwards vertical transparency relates to the ability for the 'ruled' to observe the conduct and behaviour of their 'rulers'. On the horizontal plane, outward transparency describes the capacity for an agent to observe what is happening outside the organisation, with inward applying to the ability of an actor to observe the organisation from within. Interestingly, Heald argues that this 'inward' transparency '...has the connotation of surveillance and being watched by peers' and, as such, may conflict with issues around individual privacy. This distinction perhaps underlines that the different terms used in the debate around transparency may be used to promote or reflect ideological positions - that what constitutes *scrutiny* for one person is *surveillance* for another - and that the role of language in framing the terms of a sometimes emotive debate should not be neglected.

Scholars seeking to define transparency tend to focus on either its process or purpose, although with some degree of overlap. For the former, the emphasis is on the degree to which an organisation makes explicit information concerning aspects such as its decision-making processes, performance, procedures and so forth (Curtin & Meijer, 2006; Welch,

Hinnant & Moon, 2005). For those defining transparency in purposive terms, the focus tends to reflect Bentham's view¹ by emphasising the exercise of discipline over institutions and office holders by making information about their performance public and thus deterring corrupt practices and poor performance (O'Neill, in Etzioni, 2010, p.393).

Academics differ in the emphasis they place on various aspects of transparency. Drew and Nyerges (2004), for example, discuss transparency as a function of the 'completeness' rather than simply the quantity - of information, whilst Mahler and Regan (2007) argue that the 'usability' of the information is the most important element. In the context of the electronic provision of information to the public, this is of particular relevance as organisations may exploit rapidly evolving information systems to render increasing amounts of data easily and swiftly accessible, but may do so to such a degree that this can overload those it purports to serve so that the 'expected benefits [of transparency] do not materialize because the receptors have been disabled by overload' (Heald, 2006, p.41). Indeed, one study has suggested that the provision of too much information leads to a 'lost in hyperspace' syndrome (Perez, 2009, p.55), whereby the citizen, unable to navigate the complex information systems to locate the sought information, simply gives up. This suggests that there may be a (somewhat counter-intuitive) relationship: that greater transparency is achieved through the provision of less information but, crucially, only where this information is high quality and relevant². Clearly, however, providing only relevant information poses something of a challenge for those designing 'Europa' the EU's electronic portal designed to be a 'one stop shop' for EU information.

¹ 'The more strictly we are watched, the better we behave' Jeremy Bentham (in Etzioni, 2010).

² In Perez's study into the effect of information overload on political deliberation, for example, he argues that information is 'excessive' if it exceeds the cognitive and attentive capacities of the average citizen (Perez, 2009, p.55).

Claiming to be "...one of the largest sources of information in the world" (Europa, 2012d), the portal contains over six million pages and receives nearly 15 million unique visits each month. This figure artificially inflates the level of citizen engagement as, unfortunately, the site captures data for unique visits, rather than unique visitors. As a result, each return visit to the site is counted separately. (Europa, 2012d). Thus, the "headline figure" of 15 million visits per month may give an exaggerated impression as to the public appetite for information about EU. Nonetheless, the portal acts as a "single access" information source which provides multiple links to the institutions and hosts other facilities such as Europarl TV, suggesting that the EU views it as the main conduit through which transparency is provided for EU citizens. Given that making available such a large body of information in all 23 official languages involves the outlay of significant resources, it is perhaps worth considering the EU's rationale for providing the information.

Linking transparency to democratic participation.

Models of EU legitimacy tend to suggest that an understanding of - and confidence in - the decision making process is a pre-requisite for citizen engagement. Thus, measures taken to increase transparency of EU decision-making can be considered as a method of enhancing this understanding and confidence, and provide a direct link between transparency and legitimacy. Indeed the 2006 Green Paper launching the European Transparency Initiative begins by stating that "The Commission believes that high standards of transparency are part of the legitimacy of any modern administration" (Europa, 2012a), a point reinforced by Vice President Siim Kallas' remarks that "Transparency plays an enormous role in promoting a more citizen-friendly EU and therewith helps to increase public trust towards the institutions" (Kallas, 2007). It is telling that here there is a common discourse - that the language employed in both the green paper and Kallas' public statements is similar and explicitly links

transparency - rather than scrutiny - to input legitimacy. Curtin and Mijer (2006) illustrate the linkage as at *figure i*:

Figure i: Transparency and Input Legitimacy.



From Curtin & Meijer, (2006), p.116.

Curtin and Meijer argue that, for the EU, transparency has evolved through two ages. The first, ÷...dominated by the law, lawyers and bureaucratsø was associated with a series of successful challenges by journalists resulting in the European Court of Justice (ECJ) swiftly creating a body of case law that tended to ÷...interpret rather generously the scope of the legal provisionsø(Curtin & Meijer, 2006, p.113). However, although granting the right for citizens to access documentation, the ECJ rulings did little to increase genuine transparency for the majority of EU citizens as, at this time, no system was in place for a citizen to identify the documents he or she may wish to access, a shortcoming that privileged the provision of information to those actors familiar with the workings of the EU institutions.

Thus, whilst the ECJ rulings could be said to promote greater transparency, they disproportionately served the well-resourced and those groups familiar with EU processes. This, it is argued, has resulted in a perverse consequence whereby scrutiny is exercised almost exclusively by such groups, some of which may have a particular interest in depicting a skewed picture of EU activity. Curtin and Meijer, for example, observe that, for the media, failure is more interesting than success as ÷...each imperfection, each transgression of rules and regulations, can be ruthlessly exposed...for commercial gain' (2006, p.118).

Here the scrutiny facilitated through increased transparency threatened to undermine the latter's purpose of building citizen confidence and engagement. To some extent, this was addressed by the introduction of regulation 1049 in 2001. As a precursor of later transparency measures, this explicitly gave EU citizens the right to request documents, and did so by emphasising the linkage that access to information has to enhancing public trust. The regulation's introduction states that: "Openness enables citizens to participate more closely in the decision-making process and *guarantees* that the administration enjoys greater legitimacy" (Europa, 2012b - emphasis added).

Again, the language here links the enabling mechanism of openness to the development of enhanced (input) legitimacy. As discussed, however, granting a right to access documents is unlikely to encourage citizen participation, unless coupled with measures to allow citizens a means of knowing which documents they may wish to access. On this occasion, the regulation was drafted to reflect this, article 11 requiring the institutions to provide a publicly available electronic index of documents (Europa, 2012b).

For Curtin and Meijer, this early incarnation of the electronic registers coincided with the shift of transparency from a legal to a political rationale whereby it became seen as a tool to provide more democratic policy making. In this, they argue, the Commission has taken the lead, citing as examples its promotion of the development of more "user friendly" databases and, in particular, its central role in the 2001 White Paper on Governance.

The White Paper stated that "...providing more information and more effective communication are a pre-condition for generating a sense of belonging to Europe" (Europa, 2012e). For Curtin and Meijer, this provides further evidence of an EU view that one of the functions of transparency is to improve public acceptance of the Union and that it is therefore closely related to legitimacy. In advancing this view, however, they note that transparency

best serves ÷...those with the expertise, time and courage to wade through the masses of documents...to engage in a process...of scrutinyø(Curtis & Meijer, 2006, p.114). This paper supports that view but goes further: that it is the exercise of this scrutiny, rather than the transparency that facilitates it, that leads to public confidence and the social acceptance of the policy-making process. This poses a potential paradox for those that link transparency to good governance, however, as the agent of scrutiny has space to affect public perception by choosing to exercise only selective or partial scrutiny and thus presenting a skewed picture. Nonetheless, much of the discussion around transparency appears normative in nature and takes as its starting point an assumed association between transparency and good governance.

A large part of the New Public Management (NPM) literature promotes transparency as a means for providing visibility of government outputs and thus rendering a national government more accountable to its citizens (Hood, 1991; Pollit & Bouckaert, 2004).

However, seeking to apply these NPM principles to address aspects associated with the EUø -democratic deficitø poses a particular challenge, as the causal linkages are somewhat unclear. Demonstrating, for example, that a lack of transparency leads to low electoral turnout, or that inadequate scrutiny opportunities creates a gap between the decision maker and the citizen, is problematic. Whilst these may be contributory factors, it would seem unlikely that simply increasing transparency will, in itself, lead to greater engagement. Indeed, Eurobarometer data shows that trust in the EU declined significantly between 2006 and 2011, the period during which increased transparency measures were introduced³.

Despite increased transparency providing greater scrutiny opportunities, Eurobarometer consistently shows a low level of citizen engagement (Eurobarometer, 2012). Potentially, therefore, increased scrutiny may disproportionately engage a minority serving particular

³ Percentage of respondents stating that they -tend to trustøthe EU in Autumn 2006 - 45%; in Autumn 2011 - 34% (Eurobarometer 76, p.19).

interests, rather than mobilising and enthusing the (consistently) uninterested majority. As discussed, increasing transparency may therefore have a perverse consequence in that it provides a means for information to be hijacked by a proxy group that uses it to present a selective (and sometimes negative) picture of the EU. This, in its turn, has the effect of reducing, rather than increasing, confidence of an EU citizen in the institutions: a situation discussed in more detail below.

Curtin and Meijer (2006, p.114) describe the linkage between disclosure of information by public actors to legitimacy, through the processes whereby citizens have the opportunity to monitor and scrutinise the activity of policy makers. What is less clear in their analysis, however, is the distinction between *actual* and *potential* scrutiny. Here, it is argued, the trust building mechanism operates through the *opportunity* to scrutinise rather than through the scrutiny itself. In reality, citizens may choose to exercise this scrutiny process through an informed and well-resourced proxy, and thus the development of trust is reliant not merely on the provision of information but on such information being fully and impartially presented to the citizen by a third party. As a scrutiny process this is unremarkable: the prospective purchaser of a new car is unlikely to have the engineering skill or resources to test a particular model's reliability, safety, fuel consumption and so forth. But neither is he or she likely to take the manufacturer's data at face value, relying instead on a trusted source of consumer advice. For the purchaser, it is the *impartial* nature of this advice that is paramount. Applying this process to the issue of scrutiny through the transparency measures adopted in EU policy-making raises an interesting question concerning the impartiality of this advice, in that the scrutiny of an organisation tends to be conducted only by groups with a particular ideological or commercial interest.

Here, then, we may reflect on the riddle at the heart of this transparency debate to consider whether legitimacy derives from engagement with the information available through the

transparency process or the provision of the information alone? More simply, whether transparency or scrutiny drives good practice? To address this question, the paper now considers the role of the Commission expert groups and analyses aspects of the publicly available information.

2. Transparency and the Commission Expert Groups.

Numbering about 3500, the European Commission's in house research and statistical staff is relatively small for a body representing half a billion EU citizens (Vassalos, 2010). In order to assist policy-makers, the Commission augments its knowledge base by the use of expert groups (EGs) to advise at all stages of the policy-making process. A number of academics have sought to determine the number of EGs and to quantify the source of expertise within a given group or parent DG (Wessels, 1998; Larsson, 2003, Gornitzka and Sverdrup, 2008; 2011). Although comparing statistical data drawn from differing sources is clearly problematic, it seems apparent that the numbers of EGs increased significantly over time. Wessels (1998) found that, in 1990, there were 602 EGs, a number that grew to 851 by 2000 (Larsson, 2003). In 2005, the Commission undertook to increase the transparency of the EGs through the publication of a Register of Expert Groups (Europa, 2005) which, when published in 2007, contained entries for 1237 EGs (Gornitzka and Sverdrup, 2008, p.733), although a 2009 search by the Alliance for Lobbying Transparency and Ethics (ALTER-EU) revealed only 987 expert groups; a significant reduction that, for a somewhat sceptical ALTER-EU, reversed a 40 year trend and coincided with the point where the Commission had to publish all the names of participants (Vassalos, 2010).

At the time this paper's research (April 2012), the electronic register listed 878 expert groups of which 811 were 'active'⁴. These groups consist of experts representing national

⁴ The figure for 'expert groups and other similar entities' listed on the Commission's electronic register.

administrations, organisational interests⁵ and those appointed in a personal capacity. The frequency of meetings varies but is generally only a few times each year. Meetings normally take place in Commission premises in Brussels and the Commission generally chairs the meeting and provides secretarial support. Although members are unpaid, they may claim expenses for attendance.

As discussed, the creation of an electronic register in 2007 provided a means through which the workings of the EGs could potentially be observed, although this is naturally conditional on the provision of accurate and timely⁵ information by the DGs. However, the register was not the first time that the Commission tacitly acknowledged that the opaque nature of the expert advice created an impression of decision making being taken far away from the citizen. Indeed, whilst expert group meetings are normally held *in camera*, the Commission appears sensitive to the charge that this creates the impression of an opaque and somewhat murky decision making process with negotiation undertaken by anonymous actors behind closed doors. Perhaps acknowledging this, its 2002 guidelines on the use of expertise stated that: 'Departments should consider allowing the public to observe certain expert meetings, particularly on sensitive issues' (Europa, 2012f). Notwithstanding this, discussions with officials at the Secretariat General suggest that the numbers of expert group meetings that have been held in public is very low, although detailed figures are not collated centrally and it has not yet been possible to obtain the data from the relevant DGs.

More recent efforts to increase the transparency of the expert groups have been made, in particular through the provision of an electronic register and the subsequent guidelines for its use promulgated in the 2010 horizontal rules and the associated Commission Staff Working Document (Europa, 2012g). Broadly, the framework document requires DGs to add specific data to the register concerning the process used in selecting experts, the internal rules of

⁵ These organisations are chiefly, though not exclusively, Corporate, NGO and academic.

procedures and a summary of activity. However, the 2010 document - unlike the 2002 one - contains no mention of public access to meetings, suggesting that the Commission's electronic register is the substitute means through which transparency is exercised. Whilst this distinction may seem somewhat technical, when considered in terms of the transparency of Commission expert groups, it is an important difference.

It appears then that, notwithstanding its stated commitment to transparency, the Commission privileges transparency in retrospect over transparency in real time and that, given the *in camera* nature of their deliberations, expert group negotiations are usually closed to real time scrutiny. This raises the question as to whether this retrospective transparency alone is sufficient to ensure citizen confidence in the expert group processes. To consider this, the paper now considers the extent to which this retrospective transparency provides a window on the activities of the expert groups.

Retrospective transparency and the expert groups.

Part of a larger scale project, this paper analyses the data available on the Commission's electronic register to test the veracity of the information provided. Clearly, however, findings resulting from an examination of a single source are limited in scope - no test is conducted for accuracy, for example - as, at this stage, it has not been possible to obtain access to the benchmarks against which to test the data. Given this caveat, the register is analysed to test for compliance with the Commission's horizontal rules on the provision of information on the composition and activities of the expert groups and of the information that should be disclosed.

Gender balance of expert groups.

As discussed, expert groups are composed of individuals belonging to one of three categories:

- (i) Representatives of national administrations;

- (ii) Representatives of organisations; *or*
- (iii) Individuals appointed in a personal capacity.

For category (i) and (ii), the publicly available information concerning the individual appointee is not disclosed, reference usually being made merely to 'country/public authority' or 'name of organisation' as appropriate. Individuals appointed in a personal capacity, however, are named, with nationalities, professional titles and gender published in the register. By examining those groups that have individuals appointed in a personal capacity therefore allows us to test the group's composition for gender balance⁶.

- Rule 9:

- 'they shall be chosen according to a selection process that guarantees, as far as possible, gender balance'

To test for compliance with the gender balance rule, analysis of the composition of each group containing experts appointed in an individual capacity was conducted. For the Commission 'gender balance' is defined as 'at least 40% of representatives of each gender in each expert group'. Analysis of the groups ($N = 115$)ⁱ found that an overwhelming lack of gender balance, as defined by the Commission, with only 25 groups (21.7%) achieving the 40% gender threshold compared with 90 (78.3%) that failed to achieve this.

Although there were a number of 'near misses' these were fewer than may have been expected with 34 of the groups (29.5%) represented by 80% or more of one gender. Whilst acknowledging the Commission's caveat that the process should guarantee gender balance as a medium term aim 'as far as possible', it is clear that it is some distance from complying with its own rules in this area.

Selection criteria and activities of the expert groups.

⁶In its framework document, the Commission defines 'gender balance' as representation by a minimum of 40% of each gender (Europa, 2012g).

As discussed, the workings of the expert groups are not subject to real-time transparency. Negotiations take place away from public scrutiny and the positions of individual experts, whether representing national administrations or otherwise, are not revealed. Indeed Article 14 of the Commission's Staff Working Document reinforces this procedure: "The group's deliberations shall be confidential" although adding a clause that: "the groups may decide to open its deliberations to the public". Nonetheless, the Commission requires of the groups that certain information concerning the activities and selection of the groups be made public through the electronic register.

- Rule 19:

"information concerning the activities carried out by the expert groups [shall be] made public directly in the Register or via a link from the Register to a dedicated website"

- Rule 20:

"The register shall include information on the process used for the selection of the members of the expert groups"

In order to reveal differing DG working practices in the provision of electronic information, a random sample was selected from each DG that operated a substantial number of expert groups ($n=54$)ⁱⁱ. To test for compliance with rule 19, this paper interprets "information concerning the activities carried out by the expert groups" as the provision of the agendas and minutes of expert group meetings. For rule 20, group entries were checked for an explanation of the selection process either directly on the register or through a hyperlink.

An initial analysis revealed that differing levels of details was provided between and within DGs with the entries for some groups showing multiple links to dedicated websites, minutes

and agendas of meetings and associated documents, whilst the entry for other groups had not been completed, with only a blank template visible to users. It was apparent that a classification system was needed to score the data on each group against the criteria for rules 19 and 20. The grading system used in an earlier work on the transparency of comitology committees was adapted, and a four level classification system (no information; poor; fair; good) was used with each classification given a corresponding score (0-3). The definitions of the three classifications are at *figure iv*:

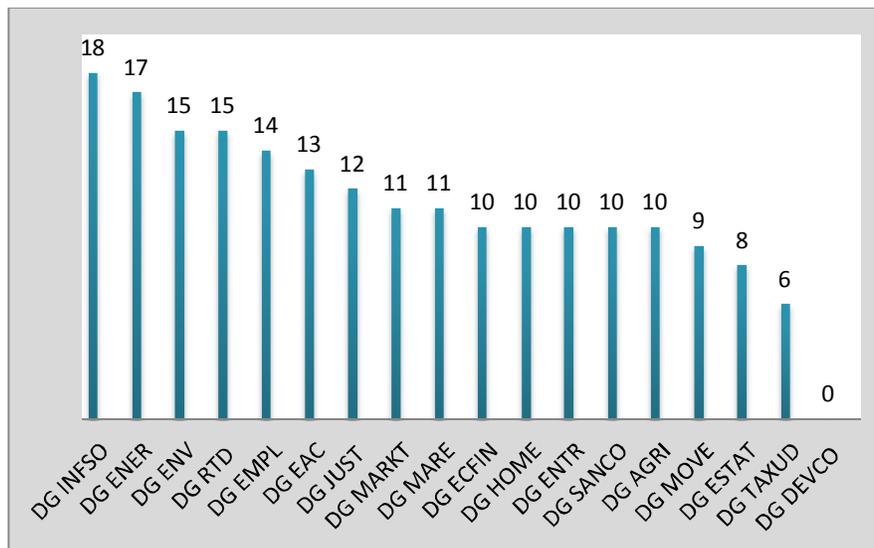
Figure ii: Classification of electronic data.

Mark	Classification	Meaning
0	No information	No criteria against which to classify entry (blank template only).
1	Poor	Scant detail or incomplete/outdated information (e.g. no minutes of recent meetings; outdated hyperlinks).
2	Fair	Reasonable amount of detail in some areas but with gaps (e.g. information about most recent meeting but no detail about past meetings nor the frequency with which they are held).
3	Good	Detailed entry with thorough and accurate explanations (e.g. access to recent and past minutes; complete explanation of selection process).

Adapted from Brandsma, Curtin and Meijer, 2008

Register entries at the DGs with the highest proportion of EGs were scrutinised for compliance with horizontal rules 19 and 20. Analysis revealed wide variation in the level of detail provided, reflected in the differing total scores. In the sample groups, *DG Information Society and Media* and *DG Energy* provided detailed information resulting in almost perfect scores, whilst *DG Taxation and Customs* and *DG Mobility and Transport* provided only sparse information and scored relatively low. The groups examined at *DG Development* had no information with only blank templates provided resulting in no score.

Figure iii: Compliance scores for expert group entry by DG.



Discussion.

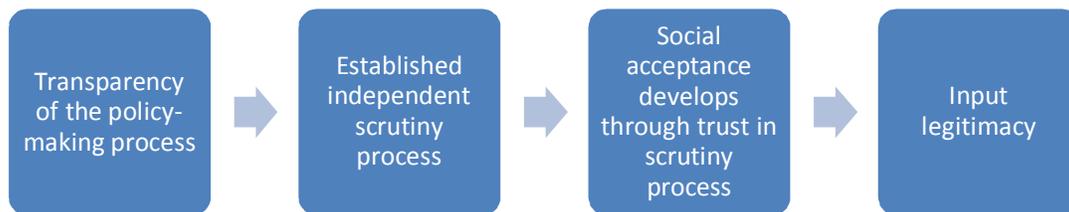
It would seem that, on the evidence derived from this study, compliance with gender balance regulation is not assured simply through increased transparency. However, it could be that the European Commission sets unrealistic goals in terms of the gender balance of individuals appointed to expert groups. By definition, there are a limited number of experts in a given area and if the available individuals are disproportionately represented by one gender, it is unsurprising that the composition of the expert group reflects this. This may explain why a number of the coal and steel advisory groups are overwhelmingly male, as is the Euratom group on nuclear safety - the latter imbalance perhaps one best addressed by the overwhelmingly *female* composition of the Helsinki group on women and science.

In terms of the data concerning the selection procedures and activities of the expert groups, the wide variation between DGs may be an illustration of the Commission's inherent bureaucratic fragmentation with its system of relatively autonomous DGs operating in isolation. That notwithstanding, it is apparent that low levels of compliance are facilitated by

a lack of oversight and sanction, suggesting that an active scrutiny process, rather than merely the passive provision of transparency, is more likely to modify behaviour.

To accommodate the provision of an impartial scrutiny process, an alternative means of linking transparency to input legitimacy adapts Curtin and Meijer's model at *figure i* above to decouple the link between transparency and engagement, and establishes instead a link between transparency, confidence in an established and robust scrutiny process, and engagement. This type of process operates in the UK through the oversight of the police by an independent police authority and the scrutiny of the teaching profession by a similarly independent body. Each of these professions consistently rate as highly trusted on the annual *Veracity* index (Ipsos-MORI, 2011), and it is argued that it is in the perceived impartiality of the scrutiny process that this trust is rooted. To present this diagrammatically, a modified version of Curtin and Meijer's model is at *figure iv*:

Figure iv: Scrutiny and Input Legitimacy.



Conclusion.

It seems then, that the EU's introduction of increased transparency measures through the European Transparency Initiative served as a legislative means to a participatory end. However, transparency is a necessary *but not sufficient* condition for increasing participation and the nature of the EU's institutional arrangements with its byzantine decision structure actually militates against citizen engagement. The complexity of navigating the EU's *labyrinths of information* (Ciborra, 2001) requires a degree of commitment and an

understanding of the sometimes convoluted processes enjoyed only by those familiar with EU working practices. As such, transparency measures may result in scrutiny being - in effect - delegated to groups acting on behalf of EU citizens to police the activities of policy-makers. Thus the underpinning assumption that transparency, rather than scrutiny, develops trust would seem flawed, a point raised in Curtin and Meijer's observation that:

As a matter of practice only those citizens with (expert) knowledge of the policy subject make use of the possibility to read information about policy, the process and the policy actors. Most people are missing knowledge to use the transparency for participating in the policymaking process. If only a small minority of citizens uses the information, is it really possible to speak about legitimacy?

It would seem that greater transparency does not, in itself, provide a remedy to the lack of citizen engagement. Indeed, without an independent and robust system of scrutiny, the potential for transparency to be used selectively in such a way as to further undermine citizen confidence in the EU should not be underestimated. Clearly, however, convincing a somewhat sceptical public that creating and funding an independent body to oversee the activities of the EU institutions is desirable remains something of a challenge.

i. The numbers of individual appointees in the groups varied from one to 75. Where groups contained six or fewer members appointed in a personal capacity, these were discounted. For the remaining groups, percentages were established by rounding to the nearest whole number.

ii Although Active groups operate across most DGs, the sample was selected from those DGs that operate ten or more groups. Three groups were selected from each of these 18 DGs ($n=54$).

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