



*Fabio De Masi, Member of European Parliament
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Committee of Inquiry on Money Laundering, Tax Avoidance and Tax Evasion (Vice-Chair)
Committee on Economic and Monetary Affairs (Member) | Committee on Transport and Tourism (Substitute)
EU-South Africa Interparliamentary Delegation (Member) | EU-India Interparliamentary Delegation (Substitute)

Fabio De Masi - European Parliament - Rue Wiertz 60 - WIB 03M031 - 1047 Brussels

The European Ombudsman
1 Avenue du Président Robert Schuman
CS 30403
FR-67001 Strasbourg Cedex
France

Brussels, 11 January 2017

Dear Ms. O'Reilly,

The President of the European Central Bank, Mario Draghi, is a member of the Group of Thirty. I am concerned that his membership in this group

- holds the risk that the public gets the impression that representatives of some private sector financial institutions gain privileged insights into the thinking and the plans of the policy preferences of a public institution, whose policy decisions are of paramount importance to all private sector market participants,
- that it creates the impression that the ECB and its President are too close to (some) private market participants to be truly independent and impartial,
- that it creates the impression that some market participants are allowed to take material advantage from the appearance that they have a privileged relationship with the President of the ECB.

I have brought up these concerns in a letter to the ECB, but I did not get a satisfactory answer, which is why I turn to you in the hope that you might be able to induce the ECB to reconsider their policies in this respect.

The Group of Thirty describes its workings and goals on its website as follows: "The work of the Group of Thirty impacts the current and future structure of the global financial system by delivering actionable recommendations directly to the private and public policymaking communities." Membership of the Group of Thirty consists of Top-level representatives of large internationally active financial institutions (many of which have been central bankers before), active Central Bankers (many of which have been top-level managers of large internationally active financial institutions before) and a few academics and other active or former public officials. A list of members with short biographies is on the G30's website.

I asked the following questions to the ECB:

1. I asked the ECB how President Draghi would avoid giving participants from the private sector privileged information during the G-30-discussions about the economy and about policy options behind closed doors.

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2. I also asked how the President would be able avoid that such joint deliberations with the private sector behind closed doors create the impression in the public that the ECB is too close to market participants.
3. I also noted in my letter that the international press routinely does not take note or transmit to the public a disclaimer, which is sometimes hidden, sometimes absent, according to which not all members of the G-30 necessarily agree with the content of the G30's recommendations, which often affect the ECB in its role in monetary policy and banking supervision. I asked the ECB, why the President has not made sure in the past that he will not be publicly associated with the group's recommendations for monetary policy and banking supervision and I wanted to know whether the ECB planned to take any action (and which) to better distinguish opinions and to avoid the appearance of a conflict of interest.
4. I also asked the ECB if it was regarded as proper that a member of the Supervisory board of the Single Supervisory Mechanism of the ECB actively participated in a working group of the G30 producing recommendations for banking supervision.

I received the following answers to questions 1 and 2.

In his reply dated October 27, President Draghi referred to the ECB's letter to the European Ombudsman from 2012 and to replies he gave on 15 June 2015 at the hearing of the European Parliament's Committee on Economic and Monetary Affairs. He stressed that the members of the Executive Board neither use nor intend to use non-public events to disclose any market sensitive or confidential information. He noted that this principle has been "reiterated" in the guiding principles for external communication by members of the Executive Board, which were published on the ECB's website on 6 October 2015. President Draghi stressed that the European Ombudsman rejected the allegation that his membership of the Group was incompatible with the independence, reputation, and integrity of the ECB and found no maladministration on the part of the ECB. This seems to be his sole reply to my first two questions.

I do not regard this as a satisfactory answer, since the former complaint, on which the Ombudsman decided in 2012, dealt almost exclusively with the nature of the Group of Thirty and the question of whether or not it was a lobby-organization. In contrast, I had voiced different concerns, which are largely independent of the classification of the G30 as an interest group or not. Also, there have been relevant new developments since 2012 as I will elaborate shortly, after issues related to questions 3 and 4 have been clarified. President Draghi points to the new guiding principles for external communication by members of the Executive Board, which contain "dos and don'ts" for some interactions of board members with private sector representatives. However, while the concerns dealt with in these guiding principles are fully applicable materially to President Draghi's interactions with finance representatives in the G30, the wording of the guiding principles is such that they do not formally apply to it.

ECB's reply to question 3:

With regard to my third question regarding the fact that recommendations of the group are routinely reported by the media as being endorsed by all members, President Draghi pointed to the ECB's reply to the Ombudsman in 2012, which however, was not concerned with the question of how the media reports. President Draghi further restates that membership in the group does not imply agreeing with every report,

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working paper or other publication of the G-30. Again, his reply does not address the problem I stressed in my question, that - given the reporting in the press - reasonably informed members of the public have good reason to assume that President Draghi does indeed share the recommendations of the G30. This would create the appearance of a conflict of interest.

ECB's reply to Question 4:

Regarding my fourth question about Julie Dickson's participation in a working group of the G30 on banking supervision the President replied that, "the compatibility of the membership of high-ranking ECB officials in the G30 is not primarily a matter of the formulation of the disclaimer for the Group's reports, but foremost a matter of the very nature of the Group." On this he pointed to the Ombudsman's assessment, which qualified the G30 as a discussion forum on issues that are relevant for the work of the ECB. He stressed that the Ombudsman noted explicitly that it is legitimate for members of the ECB's decision-making bodies to engage in appropriate public and private debates on issues of relevance to its work.

It is not clear to me, why the President refers to membership in his reply, since Julie Dickson is not a member of the G30. Also, the disclaimer he mentions was not an issue in my question. While the President might be correct that members of the ECB's decision making bodies can legitimately discuss issues of mutual interest with private sector representatives, the issue at stake here goes much beyond private discussions. The working group to which Julie Dickson contributed produced a report with recommendations on banking supervision. In the foreword, the President of the G30, former ECB President Jean-Claude Trichet, recommends banking supervisors to follow these recommendations. It is publicly noted that Julie Dickson contributed to the deliberations of the group. Thus, there is a clear danger that the public, as well as lower ranking banking supervisors within the ECB, are led to infer more prestige and authority to this group's recommendations than would be the case if a number of high ranking banking representatives came together to produce recommendations on how banking supervisors should deal with banks.

The cooperation of Julie Dickson to the report *Banking Conduct and Culture* is acknowledged and described in the "List of Working Group Members" and the "Acknowledgements" of the report.

Some supporting deliberations:

A. The importance of the disclaimer and its salience (mostly relevant for questions 2-3)

President Draghi puts much stress on the fact the Ombudsman dismissed a complaint about his membership in the G30. However, the Ombudsman based his rejection of the complaint in large part on the disclaimer in publications of the G30. The Ombudsman ruled at the time that the danger that Draghi would be identified with such reports was not there. He wrote that the reports are not produced by the whole G30 but by a working group and that each report produced by a working group contained the following statement: "*The views expressed in this paper are those of the Working Group on [subject title of report] and do not necessarily represent the views of all of the individual members of the Group of Thirty.*" Thus, he ruled, that "*there is no requirement that other members of the Group of Thirty subscribe to the views of a particular individual or a working group.*"

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Despite the importance of the disclaimer for the Ombudsman's reasoning, President Draghi claims that “, “the compatibility of the membership of high-ranking ECB officials in the G30 is not primarily a matter of the formulation of the disclaimer for the Group's reports, but foremost a matter of the very nature of the Group.” He arguably has to do so, because It has been noted that a) the disclaimer was not present in G30-reports published after the verdict of the Ombudsman until very recently, and b) that contrary to protestations of President Draghi that his membership does not imply his endorsement of G30-recommendations the media routinely reports as if President Draghi was endorsing these recommendations (See Appendix).

It is noteworthy, that it is not difficult and is routinely done by other institutions, to convey to the media the information to whom they should and should not attribute recommendations or opinions (See Appendix for example) . To my knowledge, the G30 or the ECB so far has not made any such effort, to counter the strong tendency of the media to report as if President Draghi endorsed the recommendations contained in the reports of the G30. By way of an example, take the foreword by G30-chairman Jean-Claude Trichet to the report “[Banking Conduct and Culture](#)”:

*“The mission of **the Group of Thirty** is to deepen the understanding of international economic and financial issues, to explore the international repercussions of decisions taken in the public and private sectors, and to examine the choices available to market practitioners and policymakers. This report continues that crucial mission. **We call on the leaders** of the financial community to assign high priority and urgency to strengthening conduct and culture and, in so doing, to draw on our recommendations as signposts of good practice, and as part of a comprehensive series of reforms.” (Emphasis mine)*

By allowing the erasing of the disclaimer instead of making sure it is reported to the public by the media, President Draghi partially invalidated an important reason cited by the Ombudsman to rule that his membership in the G30 was proper. Only in the latest G30-report *Fundamentals of Central Banking* has the following disclaimer been reinserted at the end of the foreword: “*Members participated in their personal capacity, and their participation does not imply support from their respective public or private institutions. The report does not necessarily represent the views of the membership of the G30 as a whole.*” This seems to be a reaction to reports about the disappearance of the disclaimer. However, the G30's press release still presents the report as a G30-report with no hint of a disclaimer of this sort. This omission all but ensures that the hidden disclaimer in the report will not be noticed by reporters, who will rarely have the time to read the foreword all the way to the end. The following is the text of the press-release:

*“Dear subscribers, Today, the Group of Thirty released its latest report, *Fundamentals of Central Banking: Lessons from the Crisis*. This major study surveys the history of central banking, focusing on evolving role of central banking, and assesses how policies and practices have shifted in response to the 2007-2009 Global Financial Crisis. The report identifies three continuing core principles for central banking and ten observations on how central banks must adjust their roles going forward to better prevent and address future crises. The report warns central banks cannot be the only game in town. Sustained and robust economic growth requires governments to urgently undertake the fiscal, regulatory, and other structural reforms needed to support growth.”*

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B. Developments and new issues since 2012

1. As noted, after the verdict of the Ombudsman, the G30 erased the disclaimer stating that not all members necessarily endorse all recommendations of the reports and that the reports are the responsibility of a working group of some members only.
2. In May 2015, ECB board member Benoît Coeuré gave a speech behind closed doors in front of some representatives of large financial institutions, in which he gave information about future ECB bond purchases. This information seems to have been used for insider dealings by participants.
3. In October 2015, after I had posed my questions to the ECB, but before President Draghi replied, the ECB published guiding principles for external communication by members of the Executive Board, which were widely understood as the ECB's reaction to the Coeuré-incident, which had damaged its credibility as an institution who keeps an appropriate distance from private sector representatives looking to benefit from privileged information.
4. The Financial Times obtained a list of meetings of high ranking ECB-officials with representatives of private financial institutions. The newspapers reported (and many other media outlets followed) that several such meetings had taken place in the immediate run-up to important monetary policy decisions. In late November 2015 the Ombudsman called on the ECB to not let its officials have such meetings in the run-up to policy decisions. The ECB decided accordingly.
5. The ECB has become the sole supervisor of all systemically relevant banks in the Euro Area.

Ad 2.

The Coeuré incident made clear how easily it can happen that seemingly innocuous remarks by high ranking ECB officials made behind closed doors in speeches or discussions with market participants can be used by these market participants to gain an unfair advantage at the expense of other market participants. The following is the lesson that Benoît Coeuré drew in an [interview](#) with *Börsen-Zeitung* published on August 15, 2015: *"The discussions ... have clearly shown that central banks must be above any suspicion that they are too close to market participants. That is true of central banks generally, and even more so when they are also responsible for banking supervision, as in the case of the ECB."*

Ad 3.

The board of the ECB decided to discontinue practices quite similar to President Draghi's discussions with bankers behind closed doors during G30-meetings or to install some safeguards at least. None of these so far apply to President Draghi's interactions with financial sector representatives in the G30.

Ad 4.

The widespread indignation of the media and the public upon learning about the formerly secret meeting of ECB-officials with representatives of the private sector shows that the public does not regard such meetings as benign and that these meetings do indeed create the impression that some people or institutions are unfairly conferred privileged access to ECB decision makers and might improperly benefit from that.

Ad 5.

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Since the ECB has become the sole supervisor of all important banks it has become even more important that the ECB avoid any impression that its top representatives might not keep a proper distance to the top representatives of large financial institutions and their interests.

C. New guiding principles for external communication by members of the ECB's Executive Board and its relevance for the ECB-Presidents G30-membership

The Guiding Principles have been published on the ECB's website.

The document demands as a general rule that members of the Executive Board "apply utmost prudence in selecting speaking engagements at external events to avoid any appearance that potentially financial market sensitive information may not be available to the widest possible public audience at the same time." This has relevance Presidents Draghi's interactions with private-sector-members of the G30. By way of an example take this [Bloomberg-report](#) from 16 October 2014 (Yellen said to voice confidence in U.S. economic expansion) on a G30 meeting that involved another central banker speaking as a guest at a G30-function behind closed doors:

"Federal Reserve Chair Janet Yellen voiced confidence in the durability of the U.S. economic expansion in the face of slowing global growth and turbulent financial markets at a closed-door meeting in Washington last weekend, according to two people familiar with her comments.

The people, who asked not to be named because the meeting was private, said Yellen told the Group of 30 that the economy looked to be on track to achieve growth of around 3 percent. She also saw inflation eventually rising back to the Fed's 2 percent target as unemployment falls further, according to the people. Michelle Smith, a Fed spokeswoman, declined to comment on the meeting, which took place on the fringes of the annual gathering of the International Monetary Fund and World Bank."

However, the specific ECB-guidelines are all phrased in such a way that they formally do not apply, even though, when the G30 discusses the state of the economy or developments in financial markets and President Draghi participates in the discussion, this raises the same issues as bilateral meetings with bankers or formal speaking engagements behind closed doors.

One of the specific guideline asks board members to "accept speaking engagements at events where their remarks could be seen as financially market-sensitive only if these remarks are published on the ECB's website at the start of the speech, or if the event can be monitored and followed directly by the general public (e.g. via a live webcast), or if the event is attended by media representatives who could report in real time. Speaking engagements on general or academic topics, where no financial market-sensitive information is disclosed, remain unaffected by this stipulation"

Note in this context that the self-declared mission of the Group of Thirty is to deepen the understanding of international economic and financial issues, to explore the international repercussions of decisions taken in the public and private sectors, and to examine the choices available to market practitioners and policymakers. Thus, it seems unavoidable, if President Draghi participates in the discussions of this group, that his "remarks could be seen as financially market-sensitive". They would however still not be made available to the wider public, due to the closed-door nature of the groups meeting and the absence of public records.

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Another guideline asks Board members to “refrain from offering to any institution, company or person who could derive profit from such information personal views about the state of the economy or the financial sector relevant to the future stance of monetary policy that have not already been expressed publicly.”

Given the stated purpose of the G30, it seems impracticable for the President of the ECB to participate in the discussion and at the same time to “refrain from offering (...) personal views about the state of the economy or the financial sector relevant to the future stance of monetary policy that have not already been expressed publicly.” President Draghi claims that he does restrict his communication with the other members of the G30 to restatements of already published communiques of the ECB. Even if he were to do so, the public would have no way of knowing and might remain suspicious. In this respect it is also notable what G30-member Paul Krugman wrote on his blog on July 31, 2012: “It’s a talk shop; I value it because I get a chance to hear what people like Trichet and Draghi have to say in an informal setting.” If Mario Draghi would always restrict himself to reading out pre-published comments on the state of the economy and financial markets, Professor Krugman would hardly say that he “valued” what President Draghi has to say “in an informal setting”. There is thus strong prima-facie evidence for the public to be suspicious, which should be reason enough for the ECB to establish safeguards.

A further guideline demands of President Draghi and his colleagues “*when considering invitations to speak at non-public events or to accept bilateral meetings, e.g. with bankers, industry representatives, or with special interest and advocacy groups*” to “*ensure that no financial market-sensitive information is divulged. As a matter of principle and where practical, an ECB staff member should be present at bilateral meetings.*” While a discussion with several bankers about the economy or market developments is neither a pure speaking engagement, nor a “bilateral” meeting, but rather something between those two, the issues addressed by the guidelines are clearly also present.

Board members are further requested to “*strive to ensure, in selecting their speaking engagements, that the acceptance of such invitations is not perceived as giving the organiser a prestige advantage over a competitor or allowing them to benefit financially from apparently exclusive contacts with the members of the Executive Board.*” While the wording restricts the demand to the selection of speaking engagements, the goal to avoid such an appearance is clearly also relevant for other forms of interaction of ECB Board members and private-sector-representatives, including forming a joint club with a high profile in the media. Financial institutions whose representatives form a joint club with the President of the ECB and other high-ranking officials could reasonably be expected to benefit from the public’s impression that these people have privileged contacts and access to these officials. The G30 is indeed promoting this impression. It regularly sends out memos to the media called “Members in the media”, which list speeches and other public engagements of members. The main purpose of these memos is arguably to use the prestige of the G30 to raise the public profile of members and/or to use the prestige of some G30-members to raise the profile of the group and of other members listed together with them.

I remain at your disposal and look forward to your response,

Fabio De Masi

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Appendix 1:

Reporting in the international press on the G30-report *Banking Conduct and Culture* as circulated by the G30 to the media:

The Financial Times

*“In a report to be published on Thursday morning in New York, **the G30 makes a series of recommendations...** Mike Mayo, a veteran banks analyst ... cautioned that the G30’s latest report — the seventh of the past seven years — could be seen as “public relations” for an industry whose reputation had yet to recover.”*

Forbes

*“**A powerful group of leaders in international finance, the Group of Thirty (G30), called last week for far-reaching banking reforms...** The G30 aims – through a set of recommended comprehensive reforms – to implement effective approaches to embedding ethical employee values and conduct within banks....**The G30 finds ...It concludes that new rules and regulations are not the answer.**”*

IR-Magazine

*“**Group of Thirty suggests...** The group, which includes US economist Paul Krugman and former US Treasury secretary Larry Summers, says... The Group of Thirty also calls on banks...”*

CNBC

*“The assessment released Thursday **from the Group of Thirty—which includes influential former central bankers, financiers and academics—**said... The organization also recommends...”*

Bloomberg

*“**Big banks must ... , according to a group of influential regulators and financiers...** Pay cuts ... aren’t deep enough, according to a Group of 30 panel with members including former European Central Bank President Jean Claude Trichet.... William Rhodes, an adviser to Citigroup Inc. and a co-chair of the steering committee for the report, said ... **Members of the working group include One thing they didn’t advocate was more regulation, preferring instead an improved framework of monitoring and guidance by banking supervisors.**”*

The Wall Street Journal

*“So reads a new report **developed by members of the Group of Thirty, the nonprofit comprised of banking and regulator luminaries** from around the world.... Bill Rhodes, a Citigroup Inc. senior adviser; TIAA-CREF CEO Roger Ferguson; former Barclays PLC chairman David Walker; former International Monetary Fund director Gerd Häusler; and former Comptroller of the Currency John Heimann were on the **steering committee that guided the report.**”*

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Reuters

“...a long awaited report by the Group of Thirty (G30) forum of international finance leaders said on Thursday. The G30 said... Sir David Walker, vice chairman of the G30 Steering Committee, said at a press conference on Thursday...”

Note: None of the reports makes it clear that Mario Draghi and other acting officials were not to be identified with the recommendations in the report. Only two of them are at least mentioning the working group. The following is an example of a press release by a different institution who wanted to make sure that the media attributed the report correctly, to show that it can easily be done:

*“Please note that this outlook is produced by Moody's Analytics, a division of Moody's Corporation, engaged in economic research and analysis. **Commentary produced by Moody's Analytics is independent and DOES NOT reflect the opinions of Moody's Investors Service, the credit ratings agency which is also a subsidiary of Moody's Corporation.** Please use the full attribution “Moody's Analytics” in the article as well as the headline when quoting Petr or referring to the content below, so as to avoid confusion that the comments come from the analysts at Moody's Investors Service.”* (Emphasis in the original)

Appendix 2:

Reporting in the international press on the G30-report *Fundamentals of Central Banking*, circulated by the G30 to the media

(Note: This was the latest report, in which the disclaimer saying that not necessarily do all member support the recommendations has been reintroduced at the end of the foreword, apparently to no effect.)

<http://www.forbes.com/sites#/sites/francescoppola/2015/10/10/g30-central-banks-did-a-good-job-after-lehman-now-its-up-to-governments/>

G30: Central Banks Did A Good Job After Lehman - Now It's Up To Governments

Frances Coppola , Oct 10, 2015 @ 08:39 PM

Opinions expressed by Forbes Contributors are their own.

A new report just published by the Group of 30 (G30) looks in detail at the causes of the crisis and the policy responses to it. It concludes that extraordinarily easy monetary policies did succeed in stabilizing markets during the financial crisis, and may well have averted a second Great Depression:

The report warns that unless governments step up, central banks could find themselves in a trap where they dare not normalize policy because of the possibility of adverse economic effects, while governments continue to do nothing in the expectation that central banks will do their job for them. As Jean-Claude Trichet, former governor of the ECB and one of the authors of the report, explained:

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The G30 members express considerable concern about the implications of what they term a “standoff” between governments and central banks. When interest rates are very low and the financial system is flooded with liquidity, the distinction between monetary and fiscal policy becomes blurred. Unconventional monetary policy has fiscal and political implications – extended use of QE, for example, is known to benefit the rich at the expense of those on middle incomes. As a result, the independence of central banks is being questioned; in both the US and the UK, there have been calls for the central bank to be subject to political direction. Unsurprisingly, one of the principal recommendations of the report is that the independence of central banks should be protected.

<http://www.reuters.com/article/2015/10/10/us-imf-cenbank-idUSKCN0S40VE20151010>

Markets | Sat Oct 10, 2015 9:34pm EDT

Central bank cavalry can no longer save the world

LINA | BY DAVID CHANCE

A report by the Group of Thirty, an international body led by former European Central Bank chief Jean-Claude Trichet, warned on Saturday that zero rates and money printing were not sufficient to revive economic growth and risked becoming semi-permanent measures.

The flow of easy money has inflated asset prices like stocks and housing in many countries even as they failed to stimulate economic growth. With growth estimates trending lower and easy money increasing company leverage, the specter of a debt trap is now haunting advanced economies, the Group of Thirty said.

"Capital losses would affect many investors, including banks, and the process of extend and pretend for poor loans would have to come to a stop," the G30 report said.

With the consequences of an exit from easy money so unpredictable, the G30 said the risk was of exiting too late for fear of sparking another crisis.

"Faced with uncertainty, the natural default position is the status quo," the G30 said.

(Reporting by David Chance; Editing by Chizu Nomiyama)

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<http://www.bloomberg.com/news/articles/2015-10-10/don-t-make-central-banks-sole-agents-of-the-recovery-g30-says>

Don't Make Central Banks Sole Agents of the Recovery, G30 Says

Jeffrey Black

October 10, 2015 — 9:15 PM CEST

Global central banks must do more to spot oncoming turmoil caused by years of their own ultra-loose monetary policy, while avoiding being cast by governments as the sole agents of economic recovery, the Group of Thirty financial-policy group said.

“While unconventional policies such as quantitative easing, off-balance-sheet commitments, and forward guidance have played an important role in the management of recent crises, deeper studies are still needed to ascertain their longer-term overall benefits and unintended consequences,” the Washington-based G30 said in a report prepared for the International Monetary Fund’s annual meeting in Lima this week. “Central banks alone cannot be relied upon to deliver all the policies necessary to achieve macroeconomic goals.”

Led by former European Central Bank President Jean-Claude Trichet, the group acts as a think-tank made up of current and previous policy practitioners on global financial issues. The report echoes and broadens concerns voiced by Trichet during his 2003-2011 term in office that while monetary policy can fight immediate financial turmoil, it can’t address the underlying causes of and risks associated with weak economic performance.

The G30’s members include Bank of England Governor Mark Carney, Bank of Japan Governor Haruhiko Kuroda, U.S. Federal Reserve Chair Janet Yellen and ECB President Mario Draghi have previously been members.

<http://www.handelsblatt.com/politik/konjunktur/group-of-thirty-geldschwemme-spaltet-die-maechtigsten-finanzlobbyisten/12438132.html>

Geldschwemme spaltet die mächtigsten Finanzlobbyisten

von [Jan Mallen](#) Datum: 12.10.2015 11:55 Uhr

Die wichtigsten Vertreter der Finanzbranche sind uneins über die Lektionen aus der Finanzkrise. Die Zerrissenheit zeigt sich in einer neuen Studie der Group of Thirty. Sie kommt zu widersprüchlichen Ergebnissen.

Frankfurt In der sogenannten Group of Thirty treffen sich nicht nur die Top-Entscheider der Finanzszene, es prallen auch zwei Welten aufeinander. Auf der einen Seite stehen Kritiker der ultralockeren Geldpolitik wie der frühere Bundesbank-Chef und heutige Verwaltungsratschef der Schweizer Großbank [UBS](#), Axel Weber, oder der Chef der Bank für Internationalen Zahlungsausgleich (BIZ), Jaime Caruana. Auf der anderen die

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Verfechter genau dieses Kurses, wie der Chef der Europäischen Zentralbank (EZB), Mario Draghi, oder die US-Ökonomen Paul Krugman und Larry Summers. Die Zerrissenheit zeigt sich im aktuellen Bericht der Group of Thirty zu den Lektionen aus der Finanzkrise.

Das Fazit im Bericht der Group of Thirty über diese unkonventionelle Geldpolitik fällt widersprüchlich aus. Zum einen wird sie gelobt. Sie sei nötig und effektiv gewesen. „Die Politik der Zentralbanken nach dem Ausbruch der Krise hat einen entscheidenden Beitrag zur Wiederherstellung der Finanzstabilität geleistet.“

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**Question for written answer Z-000132/2015
to the European Central Bank**
Rule 131
Fabio De Masi (GUE/NGL)

Subject: Questions regarding the links between the Group of Thirty (G30) and the ECB (I)

ECB President Mario Draghi is a member of the Group of Thirty, which describes its workings and goals on its website as follows: ‘The work of the Group of Thirty impacts the current and future structure of the global financial system by delivering actionable recommendations directly to the private and public policymaking communities.’

1. When Mr Draghi discusses international economic issues with managers of financial institutions behind closed doors, how does he avoid these institutions gaining valuable insight into the thinking of arguably the most influential member of the ECB’s decision-making bodies, insight that is not available to other market participants or to the general public? Should it not be expected that such exclusive insights will be abused for profitable insider dealings, as was seen in May 2015 when board member Benoît Coeuré gave a group of bankers information about future ECB bond purchases?
2. Mr Coeuré has decided no longer to speak at events organised by commercial banks¹. Does the ECB agree with this decision? If so, how will the ECB ensure that discussions between its President and high-ranking managers of financial institutions behind closed doors do not give rise to a suspicion that he is ‘too close to market participants’?

¹ <https://www.ecb.europa.eu/press/inter/date/2015/html/sp150814.en.html>

**Question for written answer Z-000133/2015
to the European Central Bank
Rule 131
Fabio De Masi (GUE/NGL)**

Subject: Questions regarding the links between the Group of Thirty (G30) and the ECB (II)

1) An analysis of the reporting on the latest G30 report entitled 'Banking Conduct and Culture'¹ in the international press (FT, Forbes, IR Magazine, CNBC, Bloomberg, WSJ, Reuters) reveals that none of the articles make it clear that the recommendations on banking supervision given in this report are only the views of the members of the working group which produced it and are not necessarily endorsed by Mario Draghi and other G30 members. Does the ECB see this as a problem in light of the fact that the ECB is in charge of banking supervision in Europe? Will the ECB take action to tackle the problem of making a distinction between opinions and possible conflicts of interests? If so, what action will it take?

2) Julie Dickson, a member of the Supervisory Board of the Single Supervisory Mechanism, seems to have participated as an observer in the deliberations of the working group that produced the latest G30 report with recommendations for banking supervision and, according to the report, seems to have 'brought her experience to the table'. Does the ECB regard it as proper for a decision-maker from the Single Supervisory Mechanism to take part in such a working group?

¹ <http://www.group30.org/images/PDF/BankingConductandCulture.pdf>

**Question for written answer Z-000134/2015
to the European Central Bank
Rule 131
Fabio De Masi (GUE/NGL)**

Subject: Questions regarding the links between the Group of Thirty (G30) and the ECB
(III)

The G30 does not seem to make any attempt to ensure that the media and the public understand that Mario Draghi does not necessarily endorse the G30 reports giving recommendations for banking supervision. There is no authorship provided, besides 'G30' on the title page or on the following pages of recent reports. A disclaimer stating 'The views expressed in this paper are those of the Working Group on ... and do not necessarily represent the views of all of the individual members of the Group of Thirty', that was included in earlier reports has been removed from recent reports. On the contrary, G30 chairman Jean-Claude Trichet has created the impression that the whole of the G30 endorses the most recent report, when he uses 'we' synonymously with 'G30'.

How problematic does the ECB regard this, if the impression of a general endorsement by the G30 has been created? Why has Mario Draghi not insisted that it is made clear in the presentation and press releases that he does not necessarily endorse the recommendations in these reports, given that similar perception issues have already arisen in the past?



EUROPEAN CENTRAL BANK
EUROSYSTEM

ECB-PUBLIC

Mario DRAGHI
President

Mr Fabio De Masi
Member of the European Parliament
European Parliament
60, rue Wiertz
B-1047 Brussels

Frankfurt, 27 October 2015

L/MD/15/599

Re: Your letters (QZ-132, QZ-133 and QZ-134)

Honourable Member of the European Parliament, dear Mr De Masi,

Thank you for your letters, which were passed on to me by Mr Roberto Gualtieri, Chairman of the Committee on Economic and Monetary Affairs, accompanied by a cover letter dated 7 September 2015.

Regarding your question on meetings with financial institutions and on the speech of Benoît Cœuré in May 2015, let me refer you to the ECB's letter to the European Ombudsman¹ and to replies I gave on 15 June 2015 at the hearing of the European Parliament's Committee on Economic and Monetary Affairs.²

In general, I would like to stress that the members of the Executive Board neither use nor intend to use non-public events to disclose any market sensitive or confidential information. Such information is not released outside of the ECB's established communication channels. This principle has also been reiterated in the guiding principles for external communication by members of the Executive Board, which were published on the ECB's website on 6 October 2015.³

Regarding your question on links between the Group of Thirty (G30) and the ECB, I would first like to underline that the issue of my membership of the Group was the subject of an inquiry by the European

¹ The letter is accessible on the ECB's website at http://www.ecb.europa.eu/pub/pdf/other/150611letter_orelliven.pdf

² The intervention is published on the European Parliament's website at <https://colms.secure.europarl.europa.eu/cmsdata/upload/5e158246-b33a-457a-825a-2d3aab2e4bbb/15.06.2015.pdf>

³ The guidelines the ECB follows as regards speaking engagements of members of the Executive Board are accessible at <http://www.ecb.europa.eu/ecb/orga/transparency/html/eb-communications-guidelines.en.html>

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Ombudsman in 2012.⁴ The European Ombudsman rejected the allegation that my membership of the Group was incompatible with the independence, reputation, and integrity of the ECB and found no maladministration on the part of the ECB.

Having clarified this general principle, with respect to the specific aspect of the publications by the G30, I would like to refer you to the ECB's reply to the Ombudsman on this issue. Membership of a discussion forum such as the G30 does not imply agreeing with every report, working paper or any other publication of the G30, just as being a member of any other such organisation does not imply agreeing with everything that that organisation publishes. The ECB publishes on its own website the Introductory Statement and transcript of the press conference as well as the Economic Bulletin and monetary policy accounts that do reflect the views of the ECB.

Regarding your question about Julie Dickson's participation in a working group of the G30, the compatibility of the membership of high-ranking ECB officials in the G30 is not primarily a matter of the formulation of the disclaimer for the Group's reports, but foremost a matter of the very nature of the Group, i.e. its purpose, its activities, its composition. In this regard, I would refer you to the Ombudsman's assessment, which qualifies the G30 as a discussion forum on issues that are relevant for the work of the ECB. The Ombudsman notes explicitly that it is legitimate for members of the ECB's decision-making bodies to engage in appropriate public and private debates on issues of relevance to its work. Again, this principle is enshrined in the ECB's recently published guiding principles for external communication. Engaging in such debates helps the ECB to gather and understand important information, which is essential for the formulation of sound policy for the benefit of all citizens and the fulfilment of its mandate.

Yours sincerely,

[signed]

Mario Draghi

⁴ The summary of the decision on complaint 1339/2012/FOR against the ECB is accessible at <http://www.ombudsman.europa.eu/cases/summary.faces/en/49298/html.bookmark>

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