Summary
Comparison Studies
European Parliament
with
US Congress
German Bundestag
UK House of Commons
Italian Camera dei Deputati
French Assemblée Nationale

Studies conducted for
EP Joint Bureau and Committee on Budgets Working Group
on the EP Budget

At the request of the EP Joint Bureau and Committee on Budgets Working Group on the European Parliament Budget, the European Parliament conducted comparison studies with the US Congress and national parliaments, Assemblée Nationale, Bundestag, Camera dei Deputati and House of Commons.
This summary outlines the main lessons derived from the studies.
This document has been drafted for presentation to the Joint Bureau and Committee on Budgets Working Group on the Budget of the European Parliament.

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**TABLE of CONTENT**

Conclusions of the *Joint Bureau and Committee on Budgets Working Group on the EP Budget* ........................................... 5

Executive Summary of the five studies prepared for the *Joint Bureau and Committee on Budgets Working Group on the EP Budget* .............................................................. 13
Conclusions of the Joint Bureau and Committee on Budgets Working Group on the EP Budget

"The culture and role of the European Parliament ought to be changing ... we just do not have the resources to carry out that role"\(^1\)

The Working Group concluded that there are four areas where the European Parliament is not yet matching its means to the challenges which it is facing:

1. Independent scientific or research advice;
2. Capacity of scrutiny;
3. Logistical support for members;
4. Local support for Members.

The studies show the difficulty of comparing the European Parliament with national parliaments due to its different relation with the executive. All four European national parliaments studied mirror in their majorities their respective governments and as such are, to differing degrees, interdependent with those governments. This fact became particularly clear in the case of the French parliament with its high degree of dependence on the government, which has a direct influence on all activities performed by the National Assembly, but also in the case of the German Bundestag, where two-thirds of legislation is tabled by the government and ministries are fully supporting parliamentary work. To a slightly lesser degree, this dependence could also be witnessed in the Italian and British parliaments. None of the national parliaments studied is fully independent of the executive in anything approaching the same degree as the European Parliament.

Even though the European Parliament's functions are not yet as evolved, they are effectively much closer to those of the US Congress. As in Congress, the European Parliament might have a different political majority to that of the executive branch. The two houses of the US Congress themselves may also have different majorities - similar to a possible situation between the two European Union co-legislators, the Parliament and the Council. Where the majorities in the executive and legislative branches coincide, it is usually assumed that the legislative branch can rely on the expertise provided by the executive. By contrast, in the US Congress, expertise has to be independent from the executive, making the comparison between the EP and the US Congress more useful. Both the European Parliament and the US Congress also have to organise democracy on the scale of continent.

\(^1\) Richard Ashworth MEP (ECR)
Independent scientific or research advice

The members of the Joint Working Group underlined the inadequacy of the independent scientific or research advice available to support Members in the challenges they face in their daily work, with ever more complicated technical legislation meaning highly specialised experts are required to assist them. One of the many examples highlighted was the evaluation exercise of REACH, where "we had not tools how we could evaluate, therefore the evaluation either did not happen or it happened in a very formal way ...". Members of the Joint Working Group found that often "studies commissioned outside do not add terribly much value ... we are to send the request we have to the Commission and they than provide the answer. That seems to me to defeat the point of the exercise ...".

In this field, the following lessons could be drawn from the studies: Research capacity and capacity for the analysis of outside research are crucial to the proper functioning of a Parliament in fulfilling its role a) as legislator, and b) in exercising control over the executive.

Examples for more efficient scientific or research support were found in particular in the German Bundestag which has a highly efficient Research Service. This service, part of the Research and External Relations Directorate-General of the German Bundestag, deals with enquiries from Members, who are able to request studies or reports on any topic of relevance to federal-level policies.

Members of the House of Commons in the United Kingdom may rely on numerous support structures for research and legislative advice. Members of the governmental majority receive a high level input, not only from their party headquarters, but also from ministries. Indeed, under the government’s budget, Ministers, even though being Members of Parliament, may hire special advisers. Members of the opposition party may rely on their party headquarters and additional individual support paid from the House’s budget. Think tanks and outside lobby groups play a considerably more important role in providing advice than is the case in the European Parliament. Furthermore, the budget of the House of Commons Library and Research services is 400% the size of that of the EP, employing approximately 270 staff.

Even the French National Assembly - which is according to the studies the least independent of the parliaments - has established a structure in charge of legislative matters, monitoring and studies. It is merged in six large operational thematic poles: legal affairs, cultural and social questions, economics and scientific assessment, public finances, European affairs, international affairs and defence. These operational poles, in addition to their principal activities, are in charge of research, innovation and expertise.

The Italian Camera dei Deputati benefits not only from the Chamber’s Library but also from four large departments providing documentation and expertise to individual Members and committees: 1) the Research Department (documentation dossiers and analyses on each draft bill under discussion in committee, describing its contents and purpose and evaluating any

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2 Edit Herczog MEP (S&D)
3 George Lyon MEP (ALDE)
potential impact on the law in force); 2) the Department for Relations with the EU (support for the EU decision-making process); 3) the Parliamentary Control Department (verification and assessment of the implementation of the law, verification and supervision of follow-up to parliamentary resolutions and non-legislative parliamentary initiatives; verification of the government’s honouring of its legal obligations to the parliament); 4) the State Budget Department (evaluation of the financial impact of bills).

One of the most developed services in this context is the Congressional Research Service (CRS), the public-policy research arm of the United States Congress. As a legislative-branch agency within the Library of Congress, the CRS works primarily and directly for Members of Congress, their committees and staff, on a confidential, non-partisan basis. It has a staff of approximately 600 employees, including lawyers, economists and reference librarians, as well as social, natural, and physical scientists. In the fiscal year 2012, the Congress appropriated the CRS a budget of approximately $106.8 million.

The CRS is paralleled by two other major congressional support agencies: 1) the Congressional Budget Office (CBO), which provides Congress with budget-related information, reports on fiscal, budgetary, and programmatic issues, and analyses of budget policy options, costs, and effects of proposed legislation, and 2) the Government Accountability Office (GAO), which assists Congress in reviewing and monitoring the activities of government, by conducting independent audits, investigations, and evaluations of federal programs. Collectively, these three Congressional agencies employ more than 4,000 people.

In all parliaments, apart from the French Assembly, the research support structure for members' daily work was found to be more developed than in the European Parliament, even though members also have the support of national ministries and party headquarters.

The Members of the Joint Working Group concluded that the European Parliament should develop a structure as "it is important for us to have documents that are prepared for us and delivered to us because it is not just a question of us phoning up agencies and trying to get studies and comparative studies from them ... it is very important to have meaningful studies that are done with a targeted goal".4

The Joint Working Group concluded that an independent in-house parliamentary research service, at the disposal of all Members, should be developed, with highly-qualified specialists able to adapt existing research material to Members' needs in the fulfilment of their mandate. In parallel, the building up of a network to gather and use "existing expertise in particular in the EU agencies"5 and other institutions is vital.

4 Monika Hohlmeier MEP (EPP)
5 Edit Herczog MEP (S&D)
Capacity for scrutiny

The Joint Working Group came to the conclusion that the European Parliament is also largely underdeveloped in the field of scrutiny of the executive. "Scrutiny ... is something which, I suspect, is a role that Lisbon did confer on this house and it is something that this house has not as yet ... that is what we ought to be doing much more of here".6

Most interesting in this respect were two houses, namely the House of Commons, with its select committees, and the US House of Representatives.

Even though the majority of the House of Commons reflects the political colour of the government, over the years it has equipped itself with a quite elaborate structure for effective scrutiny of the executive, having a considerably higher capacity for scrutiny than the European Parliament (through parliamentary questions, debates, 'opposition days' on the floor of the chamber, departmental Select Committees, and motions of confidence/censure).

The House of Commons has a broad range of committees whose role is to scrutinise the government. The departmental Select Committees oversee the various government departments. These 'scrutiny committees' have about 183 full-time staff. In addition, a specific European Scrutiny Committee monitors EU documentation and EU policy followed by government.

The Bank of England is accountable to the Parliament even though the House of Commons' Treasury Select Committee has no statutory power of veto over appointments to the Bank's Monetary Policy Committee (MPC) and Financial Policy Committee (FPC).

Finally, a Parliamentary Ombudsman is responsible for investigating complaints from citizens about maladministration by government departments, agencies and other public bodies. The Ombudsman is subject to the scrutiny of the House's Public Administration Committee.

The most developed system of governmental scrutiny could be found in the US Congress, where the functions related to the oversight of the executive are wide-reaching. In the House of Representatives, for example, the committees have 'oversight plans' for each two-year period, which are operationalised through hearings in the main committees or in their specific 'oversight sub-committees'. In such work, they seek to apply the following principles:

- a 'relevance check' on implementation by the executive, on the basis of efficiency and effectiveness of programmes carried out and financed;
- a 'budgetary check' on the cost-benefit of policy in action;
- where necessary, a substitute assessment of the implementation of legislation when mechanisms established for the executive branch to do so are considered inadequate by Congress.

Congress' powers and rights in the field of oversight are very significant:

- The Congressional Review Act enables Congress to review and disapprove agency rules and regulations ex ante;

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6 Richard Ashworth MEP (ECR)
- The Congress performs ex-post impact assessment through compulsory and regular hearings in certain fields. Hearings generally address the efficiency of agencies and programmes;
- The Congress often decides on ad hoc investigations concerning allegations of wrongdoing, lack of agency preparedness or competence, fraud, abuse, conflicts of interest;
- The Congress may de-authorise a federal agency and terminate a programme;
- The Congress may cut-off or reduce funding of a federal agency;
- The Senate confirms nominees for top positions in federal government departments and agencies.

Congress’ instruments in oversight activities are well established and funded. The Congress’ Special Inspectors have responsibility for auditing and investigating specific programmes. The Government Accountability Office (GAO) conducts field investigations, prescribes accounting standards, prepares policy analysis, programme evaluation, cost-benefit analyses and efficiency studies. It prepares hundreds of reports annually, being bigger that some federal agencies or departments and having a staff of more than 3000.

The European Parliament itself has recently started to develop an Impact Assessment capability independent of the European Commission, including ex-ante evaluation, and soon ex-post impact assessment. It has also been developing a parallel capacity to identify potential or lacking European Added Value at EU level.

However, on the committee side, the only EP committee specifically focusing on scrutiny on a consistent basis is the Budgetary Control Committee. Scrutiny "is a classical duty of Parliament, apart from the budget, its implementation and expenses, is to scrutinise the quality and the compliance with the policies and rules we have adopted in Parliament ... we need, really, better infrastructure for policy scrutiny in each committee".

The Joint Working Group concluded that the following two aspects should be studied over the coming months, in order to enable the European Parliament to live up to its enhanced role under the Lisbon Treaty. These are: 1) the introduction of sub-committees to the full committees, concentrating specifically on scrutiny and oversight of the executive and ex-post impact assessment, where these are necessary; and 2) an evaluation not only of whether to strengthen existing administrative structures for ex-post impact assessment, but to also of engaging the Court of Auditors (in a similar manner to the US Government Accountability Office) in a process whereby the Court not only provides Parliament with the input necessary to evaluate the correctness of EU spending and the functioning of financial control mechanisms, but whereby the Court and Parliament also agree annually on a work programme allowing a proper evaluation of the wider performance or quality of EU legislation or funding in practice.

7 VP Alejo Vidal Quadras MEP (EPP)
Logistical support for Members

Logistical support for Members is crucial to ensure the efficiency Members need to do their daily work. In this context, interesting lessons could be drawn in particular concerning work space for Members' assistants, IT equipment, travel support and the car service in different national parliaments. Allowances received by members in the different parliaments are quite similar.

Particularly worrying is the situation of work-space for assistants, "where sometimes 6 persons have to share a space of 17 m² whereas in the Bundestag Members have minimum 3 and in all new buildings 4 office units". The Joint Working Group stated that this is not only a question of 'comfort' but first and foremost a question of safety and basic working conditions.

One difference the European Parliament faces with regard to all studies is the discrepancy of salaries in the home countries of MEPs. "This leads to a situation, where Members of some Member States can employ with the same envelope up to 13 local assistants where others can employ a maximum of 2. This leads to huge differences in the support Members of the European Parliament can rely on."

The Joint Working Group concluded that two issues are to be studied in this context:
1) the provision of adequate space for Members' assistants, in particular in Brussels, and the adaptation of logistics in the buildings in Brussels to the enormous increase in users;
2) the discrepancy in the possibility of hiring local support for Members due to differential salary scales.

Local support for Members

On average, each MEP has to connect with nearly 700,000 citizens. This is on average six times more than a national MP. In order to connect better with citizens, ways and means should be studied. The only comparable parliament in this context is the US Congress with a similar geographical and demographical scope.

In the US House of Representatives the awareness of the necessity of 'getting closer to the voter' has been increasing. This is mainly due to the fact that a new stage in political communication and partisan organization with 'net-root' politics is changing the accountability process for Members. In one of the world's most advanced ICT societies, the internet ensures 'presence' on the two sides - Washington and in the field. Members are accountable to national networks on their thematic activity, as well as remaining accountable to local voters and activists who wish to continue to interact with their representative when elections are over.

8 Monika Hohlmeier MEP (EPP)
9 Monika Hohlmeier MEP (EPP)
A minimum of 15-18 weeks is dedicated to 'constituent work'. Even during session weeks, two days are usually kept for 'constituent work' in the district. On average, Representatives travel back and forth to their constituency no less than 40 times a year. This travel accounts for most of their annual travel budget (accounting for 3.5% of the Member’s Representational Allowance, MRA). The constituencies of Representatives have a similar population to the average constituency of MEPs in larger EU Member States, with a population of around 770,000 inhabitants.

The activities of Representatives include:

- Dozens of town-hall meetings and ribbon cutting activities in which they report to citizens;
- The daily provision of information and expertise on relevant federal legislation and access to federal grants;
- Extensive presence in all local media;
- Case by case assistance on issues involving government (called 'case-work').

Usually more than half of the annual 1,446,000 USD (1,112,307 €) Member’s Representational Allowance is spent in the constituency, with more than half of permanent staff expenses allocated to a Member spent there (40% of MRA), district offices (7% of MRA), and outreach activities with citizens including publications including local meetings (7% of MRA). District offices typically have 5 to 8 specialised and qualified staffers and an equivalent number of interns from local schools or universities (not to mention fund-raisers paid from fund-raising activities). Activists and volunteers also join the office during campaign periods. Job specialisation is high in district offices, with district directors, ‘case-workers’, field representatives and staff assistants.

The Joint Working Group concluded that several issues should be studied in the coming months: the need for greater presence in the respective Member State, an enhanced presence in the constituency, therefore including better support with IT equipment / support in constituency offices, a further increase of support by the EPIOs, and analysis of existing local support and efficiency gaps.
Executive Summary of the five studies prepared for the Joint Bureau and Committee on Budgets Working Group on the EP Budget

Endowed with new competencies and responsibilities after the Treaty of Lisbon, the European Parliament is well on its way to build - in the name and on behalf of the European citizens - a true transcontinental democracy. To measure where Parliament stands today in this endeavour, Members requested, in both the EP resolution on the draft general budget 2012 and in their resolution on the estimates of the 2013 EP budget, a comparative study with the budgets of a representative sample of Member-State parliaments.

Following this request and on the basis of the instructions given by the Joint Working Group of the Bureau and the Committee on Budgets, four studies analysed and compared the EP's key functions and their budgetary requirements with the situation in the German Bundestag, the French Assemblée Nationale, the UK House of Common's and the Italian Camera dei Deputati.

A fifth study looked further away - and further ahead: In an equally comprehensive exercise, key functions and expenditures of the world's two most influential parliamentary bodies were compared: Those of the European Parliament and the US Congress, especially the House of Representatives.

The findings of these studies are far-reaching:

Not only do they clearly show that in many areas the European Parliament is spending less for more compared with the national parliaments examined.

Yet they also demonstrate that in several legislative key areas, especially as regards independent scientific advice and the capacity for scrutiny, the European Parliaments has - in direct comparison - ample room for improvement.

The findings also show that if the European Parliament was to continue on its road to avail itself of the full potential of the Lisbon Treaty, if the three pillars of 'going global, going local and going digital' - as proven necessary by the Study on the European Parliament in 2025 - were to be implemented, then the US Congress as continent-wide democratic institution is a benchmark the European Parliament could set for itself.

Here not only factors like pre-legislative and oversight work, but also the available appropriations provided for constituency work (seen as crucial in a transcontinental Parliament like the US Congress) could well serve as comparable model.

In order to obtain a reliable basis for the analysis, the differences concerning roles, responsibilities and working structures of the respective houses have been taken into account and the budgetary figures have been accordingly adjusted, i.e. all elements which are unique for each parliament have been quantified and deducted from the budget of the respective houses to make a comparison between the EP and each national parliament analysed possible.
I. The European comparison

Basic differences

The European Parliament (EP) is an institution at supranational level. It is fully independent from the executive (Commission) and co-legislator (Council). It has a wide influence on policy making and has steadily increased its powers in the legislative and inter-institutional arrangements of the EU. Today the European Parliament is an equal partner with the Council of Ministers. The EP provides direct representation of citizens at EU level and seeks to ensure democratic accountability of EU-wide decisions.

In national parliaments, the focus of work is mainly on the government. In all four national parliaments analysed, the members of government are also Members of parliament.

The fact that the German Bundestag is not entirely independent from the executive branch has a direct influence on all activities performed by the Bundestag (legislative powers, scrutiny, international relations). In Germany about two thirds of all bills tabled are introduced by the Federal Government. A large amount of legislative work is therefore done by civil servants in the Federal Ministries, who also assist the committees of the German Bundestag in the process of drafting amendments to parliamentary bills.

Also in the French National Assembly the focus lays on government. Although there is no obligation for the Prime Minister or the other ministers to be parliamentarians, the members of the French government are, in principle, also Members in the National Assembly. The fact that the French National Assembly is not entirely independent from the executive branch has a direct influence on all activities performed by the National Assembly (legislative powers, scrutiny, international relations).

The Italian Chamber of Deputies primarily has a legislative function, carried out jointly with the Senate (perfect bicameralism). However, unlike the EU system, the right of legislative initiative is not a prerogative of Government, with Bills also introduced by individual, or groups of, Deputies or Senators. Indeed, in Italy about 90% of Bills are introduced by Members of the Parliament (Chamber and/or Senate) with just 8% of Bill tabled by the Government.

Finally, looking at the United Kingdom, also the House of Commons’ majority reflects the government, with Ministers being actual sitting members of the House of Commons. The House of Commons’ Members are largely free to decide their individual schedules, including their presence in Parliament or in the constituency;

The main indicators, comparing parliamentary size, citizens represented, comparable budgetary figures as well as working methods and time are found in the Annex to this synthesis.

In the studies carried out, four areas were identified as being of specific interest for further development of the European Parliament: The capacity for independent scientific advice, the capacity for scrutiny, the logistical support for Members and, last but not least, the local support for Members in their constituencies.
a) Independent scientific advice

The Bundestag’s Research Services deal with enquiries from Members, who are able to request studies or reports on any topic of relevance to federal politics. There are at present 11 research sections, with a total of approx. 60 research staff, who support Members work by presenting their findings concisely and comprehensibly in forms that are suitable for the purposes of political discussion. Each year, the research staff draws up between two and three thousand studies, progress reports, dossiers, etc.

Due to the interdependence of the majority of the French National Assembly with the government, a large amount not only of legislative work but also of advice and scientific input is performed by civil servants in the National Ministries and political party headquarters. However, the French National Assembly has given itself a structure in charge of legislative matters, monitoring and studies. It is merged in six large operational thematic poles: legal affairs, cultural and social questions, economics and scientific assessment, public finances, European affairs, international affairs and defence. A special expertise and assessment body was set up in 1983 - the Parliamentary Office for Scientific and Technological Assessment (OPECST), acting as an intermediary between the worlds of politics and research. Since the setting-up of the OPECST, nearly 120 reports have been published.

Members of the Italian Chamber of Deputies may rely on numerous support structures for scientific and legislative advice. Next to the Library itself (budget 2010 3.05 million EUR, 51 full-time staff), four large departments with a total of 116 staff provide documentation and expertise to individual Members and committees: the Research Department, the Department for Relations with the European Union; the Parliamentary Control Department and the State Budget Department. The most part of these services are also provided to research centres and universities, with general public allowed access.

Members of the House of Commons may rely on numerous support structures for scientific and legislative advice. Next to the substantial high level input from party headquarters, Ministries, Think tanks and lobby groups, the budget of the House of Commons Library and Research services is 400% that of the EP and employs approximately 270 staff. Their output also has a larger and more diversified scope. Library research staff provides all MPs with weekly standard briefings on all major subjects, confidential enquiry services (23 679 requests in addition to 8 342 quick reference enquiries in 2011-12) as well as briefings for the House and Members, including Research papers (66 in 2011-12), debate packs (206) and standard notes (1200).

b) Capacity for Scrutiny

In the German Bundestag, the role of scrutinising the government is naturally performed first and foremost by the opposition groups, although Members from the groups in the governing coalition engage in scrutiny too through their participation in parliamentary processes.
In the framework of its prerogatives concerning financial monitoring, the French National Assembly has, over recent years, set up two permanent missions with the aim to oversee efficiency of public expenditure. The Assessment and Monitoring Mission (MEC) is responsible for monitoring the use of public funds; while the Assessment and Monitoring Mission for the Laws Governing Social Security Financing Laws (MECSS) is in charge of checking the application of laws concerning the financing of social security and assessing all questions concerning social security finances. In addition, the Commission for the Assessment and Monitoring of Public Policies (CEC) carries out assessments of public policies and brings expertise to the impact studies which accompany Bills tabled by the Government.

The Italian Chamber of Deputies enjoys strong supervisory and control powers over the Government, primarily by means of the vote of confidence, with one tenth of Deputies able to move a motion of "no confidence" at any time. Also here, the role of scrutinising government is performed mainly by the opposition. A special Committee on legislation, composed of 10 members (5 from the majority and 5 from the opposition) has the primary role to deliver opinions on delegated acts (Decreto Legge) adopted by the Government. Also all standing committee activities involve an element of scrutiny, with their mandates referring to the "investigation, fact finding and scrutiny" of governmental activities. Finally, the Parliamentary Control Department supports parliamentarians' need for reliable information, documentation and research in the area of governmental scrutiny. The Italian Chamber of Deputies thus has larger scrutiny mandates in all Committees and Plenary than the EP.

The House of Commons has equipped itself over the years with a quite elaborate structure for effective scrutiny of the executive, having a considerably higher capacity for scrutiny than the European Parliament. A broad range of committees has as primary role to scrutinise the Government and its departments, having about 183 full time staff. Specific procedures for scrutiny which make plenary debates in the House of Commons very lively and interesting for television include MPs' weekly question time of government Ministers, a set time for debates on general issues of Government policy and, finally twenty days per parliamentary year set apart for the Opposition to question Government and selecting the subject for discussion.

c) Logistical support for Members

- Bundestag, Germany:

An allowance to support Members in their official and representational duties is available in both houses. The EP appropriations for this purpose were slightly higher (+8%) in 2011 than those available in the Bundestag. However the Bundestag's expense allowance also covers travel costs within the Federal Republic of Germany (including Member's constituency) and the Member's expenditure on a second home at the seat of Parliament. Members also receive a travel pass for free use of all transport facilities of the rail operator Deutsche Bahn AG. Furthermore, no distance and duration allowances are paid to Members and no daily subsistence allowance is paid in Berlin.
Besides the expense allowance, an annual amount of EUR 12,000 is available to each Member of the Bundestag to cover IT and communication costs incurred at the seat of the Bundestag. Reimbursement of costs is made against invoices. The amount of an invoice can not exceed EUR 800.

The Bundestag's pension system has been changed recently in 2008, the new pension system is based on similar elements as in the EP: no pension funds, pension are paid from the current year's budget appropriations, no pension contributions are paid by Members, amounts shall be calculated on the basis of members' monthly remunerations, etc. At the same time, there is a difference between the level of entitlements: in the EP, the entitlement is amounts to 3.5% of a sitting Member's remuneration per year of mandate subject to a minimum of one year of mandate with a ceiling of 70% of a Member's remuneration compared to 2.5% and a maximum of 67.5% in the Bundestag.

Appropriations for parliamentary assistance allowance are at the same level in both houses although there are differences in the system of assistance allowance (several types of contractual relations with assistants with different rights exist in the EP).

As regards buildings, the Bundestag’s budget includes only limited appropriations for rental or purchase of buildings, since this is a matter for a special government agency.

- *Assemblée Nationale, France:*

In 2011, the National Assembly's appropriations to support Members in their official and representational duties were considerably higher (+50%) than those for the same period in the European Parliament. In France, travel costs between the Member's constituency and the seat of the National Assembly (Paris) are generally covered by the travel pass provided free of charge to Members for the entire national railway network in first class (couchette and sleeping car services included). A free card for the Parisian transport system of the RATP is also available for Members. For travel within Paris and the Parisian area, the National Assembly has a car pool of around twenty vehicles with chauffeurs, however Members may use Parisian taxis when the car-pool is not able to fulfil all requests. As regards air travel, the National Assembly covers annually for MPs from continental France 80 trips between Paris and the constituency in the case of a regular air connection and 12 trips within continental France outside of the constituency (special rules apply for overseas MPs). Members receive no distance and duration allowances and no daily subsistence allowance in Paris.

Appropriations available for hiring assistants in the EP are double compared to the French National Assembly. French MPs are entitled to engage up to five assistants, with the average varying between three and five. In the EP, the average number of assistants amounted to 6 in 2011. In France, in the event of non-use of the entire Parliamentary staff allowance, the balance is returned to the budget of the National Assembly or may be donated by the MP to his political group in order to cover salaries of those employed by the group.
- Chamber of Deputies, Italy:

Deputies' travel costs are generally covered by the travel pass provided for free of charge for all transport facilities within the national territory. Thanks to the so called "tessera del deputato", Deputies can debit train and plane fees for national travel directly to the Chamber's of Deputies account. Moreover, Deputies are entitled to a 3-month lump-sum payment of 3,000 to 4,000 EUR to cover travel costs for transfers between his/her place of residence and the closest airport and between Rome airport and Montecitorio Palace. Specific annual envelopes exist for other kinds of travel.

Deputies are entitled to EUR 3,098.74 per annum to cover telephone and mobile expenses. Costs for telephone calls using the Chamber's telephone lines are deducted from this amount. In contrast, EP Members enjoy free use of EP telephone lines or national and international calls. The Chamber of Deputies also grants Deputies a one-off payment of EUR 2,500 per legislative term to cover expenses linked to IT equipment.

The total expenditure of the Chamber of Deputies for IT and telecommunications, stationery, office supplies and miscellaneous consumables (for Deputies and staff) is 6.2% higher than the corresponding EP expenditure.

The Chamber’s headquarters, Palazzo Montecitorio, is equipped with a new television studio for the production of contents to be broadcast by satellite and by the internet through the Chamber of Deputies TV channel and a new Web TV. All plenary sessions are broadcast live on its TV satellite channel.

The Chamber of Italy owns and rent several buildings to allocate political bodies and administrative offices. The high historical value of some of the Chamber's buildings explains why the total expenditure for buildings and associated costs is 16.3% higher in Italy than in the EP1.

- House of Commons, UK:

MPs are provided with an office in the premises of Parliament. As office space in London is scarce, most MPs have not more than 1 assistant working in their London office, while employing on average 4.2 support staff, excluding unpaid volunteers and interns. The financial envelope for assistants provides for an average of three full time assistants, but MPs are free to hire as much staff as they wish with the envelope.

Members receive from Parliament 5 pieces of IT equipment, they can freely choose between different possibilities from desktop computers to laptop computers. IT maintenance is provided by the administration.

Members receive travel allowances within the UK, in their constituencies as well as for three journeys abroad on a real cost basis.

1 Adjusted figures
Until very recently, when in London MPs had the choice to a) rent an apartment, b) stay at a hotel or c) buy a property and get the mortgage reimbursed. This system has changed and mortgages are only paid for those MPs who were already under this scheme in the last legislature. Reimbursement is now applied on a real cost basis.

After a scandal surrounding Members’ allowances in 2009, the House of Commons “outsourced” all major payments directly linked to Members, managing itself only expenses linked to the administration. Almost all Members’ expenses, including salaries, allowances and funds for assistants, are managed by the Independent Parliamentary Standards Authority (IPSA). Even though they pay into the House of Commons pension scheme, British MPs qualify as self employed for other fiscal questions.

d) Local support for Members

In order to meet the expenses linked to the exercise of their office not directly covered or reimbursed by the French National Assembly, MPs have an operational expenses allowance which increases in line with civil service salaries. As of 1 July 2010, this gross monthly allowance represents € 6,412.

No support specifically linked to the Italian Deputies electoral constituencies is provided. Indeed, Deputies receive a monthly allowance of EUR 3,690 as financial support intended to cover all expenses directly linked to the exercise of the parliamentary mandate and their official and representational duties (in Rome as well as in their electoral constituency). This allowance can also cover expenditures linked to the employment of Deputy's assistant and staff (in Rome as well as in their electoral constituency).

Members of the House of Commons employ on average between 2 and 3 full time assistants in their constituencies; however, they may decide not to do so. Local offices can be rented and are reimbursed on a real cost basis. Equipment for these offices is paid for out of the specific allowance.

II. The transatlantic exercise

The Joint Bureau and Committee on Budgets Working Group on the European Parliament Budget had also requested the Secretary General to provide a comparison between the European Parliament and its US counterpart in the field of budget and functions. The study, carried out in collaboration with the European Parliament Liaison Office in Washington, DC, focuses on the pre-legislative activity in the two institutions, describes the legislative process in the US Congress (HoR), depicts its oversight work in the US Congress (HoR) and explains the constituency activities of US Representatives before giving a comparison of appropriations provided for Members in the House of Representatives and in the European Parliament.
Independent Expertise in the Pre-Legislative and Legislative Phase

Even though its functions are not yet as evolved, the European Parliament is much closer to the US Congress than to many national Parliaments in the EU. Where the majority in the Executive and in the Legislative coincide, it is assumed that the Legislative can rely on the expertise provided by the Executive. On the contrary, in the US Congress, expertise has to be independent from the Executive.

The independent expertise capacity in Congress is ensured by a range of Congressional offices providing expertise throughout the pre-legislative, legislative and oversight cycle:

- **The Congressional Budget Office** (staff: 240) provides ex-ante independent impact assessment of budget proposals;
- **The Government Accountability Office** (staff 3300), provides an independent ex-post impact assessment of the Executive and carries out independent performance and financial audits, programme evaluations and policy analyses, playing a key investigative role;
- **The Congressional Research Service** (Staff: 651) provides briefing and policy oriented research for Members throughout the pre-legislative, legislative and oversight phases;
- **The Office of the Legislative Counsel** assists, on an impartial and confidential basis, committees and Members of the Congress, when requested by them, in the drafting of proposed legislation;
- **The Parliamentarian** is an official of the House who provides objective advice to Members and staff on legislative and parliamentary procedure;
- **The Clerks** of the House and of the Senate are responsible for the technical preparation of the act to be submitted to the President in order for him to be able to sign the bill into law;
- **The Law Revision Counsel** is responsible for the codification of existing and new legislation and for the official publication and updating of the US Code.

Oversight of the Executive

Also the oversight of the Executive is more developed in the US Congress. It is exerted jointly by the two Houses under growing public pressure to increase accountability and plays an important role in the political process. Through oversight activities, the minority regains some rights against the majority principle, but also Members not senior enough to impact on legislation may gain public coverage and wider recognition.

Congressional powers and rights in the field of oversight are important: Congress can review and disapprove agency rules and regulations ex ante and performs ex-post impact assessment through compulsory and regular hearings in certain fields. Congress may also de-authorise a federal agency and terminate a programme, cut off or reduce funding of a federal agency and confirm nominees at top positions in federal agencies.
Congressional instruments in oversight activities are well established and funded. The Congress Special Inspectors generals have the responsibility for auditing and investigating specific programmes. The Government Accountability Office conducts field investigations, prescribes accounting standards, prepares policy analysis, programme evaluation, cost-benefit analyses and efficiency studies. It prepares hundreds of reports annually, being bigger than some federal agencies or departments and having a staff of more than 3,000.

The European Parliament itself is starting to develop Impact Assessment functions independently from impact assessment carried out by the European Commission, in similar directions: ex-ante evaluation, ex-post impact assessment. The European Parliament also tries to identify potential or lacking European Added Value.

Presence in the Constituency

Criticisms against the Congress and ‘Washington’ as a system have triggered reactions in the Congress. Emphasis has first been put on ‘collective representation’, i.e. improving the public perception of Congress as it operates in Washington. Important resources have been devoted to general services to the public like the Library of Congress, increased communication about American democracy through the visitor’s centre, exhibitions or the Congress' on-line presence and finally comprehensive compliance measures, ensuring through a dedicated Compliance Office that Congress applies federal law in an exemplary manner, for instance in the field of equal opportunities.

Also recognizable is a trend of US Representatives to 'return to their constituency', i.e. getting closer again to the voters. Some reasons for this trend may be seen in the shift from legislative to pre-legislative activities and oversight in the value chain in Congress as well as in the a new stage in political communication and partisan organization with ‘net-root’ politics changing the accountability process for Members.

A minimum of 15-18 weeks is dedicated to ‘Constituent Work’. Even during session weeks, two days are usually kept for constituent work in the district. On average, Representatives travel back and forth to their constituency no fewer than 40 times a years. Those travels account for most of their annual travel budget (3.5% of MRA).

The constituencies of Representatives have a similar population as the average constituency of MEPs in larger EU Member States with a population of around 770,000 inhabitants. The activities of Representatives include dozens of town-hall meetings and ribbon cutting activities in which they report to citizens, the daily provision of information and expertise on relevant federal legislation and access to federal grants, an extensive presence in all local medias and, especially, an extensive case by case assistance (called casework).

Usually more than half of the 1,446,000 USD (1,112,307 EUR) annual Member’s Representational Allowance is spent in the constituency, with more than half of the permanent
staff expenses allocated to a Member spent there (40% of MRA), district offices (7% of MRA), outreach activities with citizens including publications and local meetings (7% of MRA).

District offices have typically 5 to 8 specialised and qualified staffers and an equivalent number of interns from local schools or universities (not to speak of the fund raisers paid from fund raising activities). Activists and volunteers also rejoin the office during campaign periods. Job specialisation is high in district office with district directors, ‘caseworkers’, field representatives and staff assistants.
## ANNEX: Main Indicators

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<tr>
<th></th>
<th>EP</th>
<th>DE</th>
<th>UK</th>
<th>IT</th>
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<tbody>
<tr>
<td><strong>N° of Members</strong></td>
<td><strong>736</strong></td>
<td><strong>622</strong></td>
<td><strong>650</strong></td>
<td><strong>630</strong></td>
<td><strong>577</strong></td>
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<tr>
<td><strong>N° of inhabitants</strong></td>
<td>502 120 829</td>
<td>81 751 602</td>
<td>62 498 610</td>
<td>60 626 442</td>
<td>65 048 412</td>
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<tr>
<td><strong>N° of inhabitants / Member</strong></td>
<td><strong>682 229</strong></td>
<td><strong>131 433</strong></td>
<td><strong>96 152</strong></td>
<td><strong>96 232</strong></td>
<td><strong>112 736</strong></td>
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<tr>
<td><strong>Surface</strong></td>
<td>4 325 675 km²</td>
<td>357 026 km²</td>
<td>301 336 km²</td>
<td>130 395 km²</td>
<td>543 965 km²</td>
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<tr>
<td><strong>Surface / Member</strong></td>
<td><strong>5 877 km²</strong></td>
<td><strong>574 km²</strong></td>
<td><strong>463 km²</strong></td>
<td><strong>207 km²</strong></td>
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<td><strong>Budget (EUR)</strong></td>
<td><strong>1 658 829 393</strong></td>
<td><strong>681 783 000</strong></td>
<td><strong>568 169 136</strong></td>
<td><strong>1 108 119 521</strong></td>
<td><strong>547 499 270</strong></td>
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<tr>
<td><strong>Execution</strong></td>
<td><strong>1 570 478 058</strong></td>
<td><strong>666 688 569</strong></td>
<td><strong>489 378 523</strong></td>
<td><strong>1 072 112 152</strong></td>
<td><strong>526 892 303</strong></td>
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<td><strong>Execution/ Inhabitant</strong></td>
<td><strong>3.1</strong></td>
<td><strong>7.8</strong></td>
<td><strong>7.27</strong></td>
<td><strong>17.68</strong></td>
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<td><strong>Activity</strong></td>
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<td>Working weeks</td>
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<td>36-38</td>
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<td>Working days</td>
<td>154</td>
<td>100</td>
<td>180-190</td>
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<td>125</td>
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<td>Weeks outside Parliament</td>
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<td>29</td>
<td>14</td>
<td>6</td>
<td>13</td>
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<td><strong>N° of committees</strong></td>
<td>20 Standing Committees and 2 Sub-Committees, 2 Temporary Committees</td>
<td>22 Standing Committees and 1 Sub-Committees</td>
<td>93 Committees and Subcommittees, incl. 5 Lords Committees, 2 Joint Ctts</td>
<td>14 Standing Committees, a committee on legislation, 3 special committees</td>
<td>8 standing committees plus four special committees</td>
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<td><strong>Number of committee days</strong></td>
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<td>10</td>
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<tr>
<td><strong>N° of committee meetings</strong></td>
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<td>687</td>
<td>2 634</td>
<td>4520 (2104 h in total)</td>
<td>778</td>
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<tr>
<td><strong>N° of hearings</strong></td>
<td>97</td>
<td>142</td>
<td>1509 oral evidence</td>
<td>82</td>
<td>1619 (517 ctte hearings)</td>
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