

## Alerts to the EU Transparency Register Secretariat, 22.9.2020

### Facebook

Dear Register Secretariat Team,

according to the Register's code of conduct, organisations should "ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading." This means according to the Register's guidelines that organisations should list "their membership of any associations, federations, confederations, networks or other bodies."

Hereby, I would like to alert you that Facebook Ireland Limited does not comply with this, as it doesn't list its membership in the following organisations: Centre on Regulation in Europe (CERRE), BRUEGEL, European Policy Centre (EPC), Friends of Europe, Lisbon Council, Transatlantic Policy Network. According to the websites of these organisations however Facebook is a member.

We would welcome if you consider the fact that the information provided by Facebook is incomplete.

Kind regards,

Max Bank (LobbyControl)

### Apple

Dear Register Secretariat Team,

according to the Register's code of conduct, organisations should "ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading." This means according to the Register's guidelines that organisations should list "their membership of any associations, federations, confederations, networks or other bodies."

Hereby, I would like to alert you that Apple Incl. does not comply with this, as it doesn't list its membership in the following organisations: Centre on Regulation in Europe (CERRE), BRUEGEL, European Policy Centre (EPC). According to the websites of these organisations however Apple Incl. is a member.

We would welcome if you consider the fact that the information provided by Apple Incl. is incomplete.

Kind regards,

Max Bank (LobbyControl)

### Google

Dear Register Secretariat Team,

according to the Register's code of conduct, organisations should "ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading." This means according to the Register's guidelines that organisations should list "their membership of any associations, federations, confederations, networks or other bodies."

Hereby, I would like to alert you that Google does not comply with this, as it doesn't list its membership in the following organisations: German Marshall Fund, Transatlantic Policy Network. According to the websites of these organisations however Google is a member.  
We would welcome if you consider the fact that the information provided by Google is incomplete.  
Kind regards,  
Max Bank (LobbyControl)

## **Amazon**

Dear Register Secretariat Team,

according to the Register's code of conduct, organisations should "ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading." This means according to the Register's guidelines that organisations should list "their membership of any associations, federations, confederations, networks or other bodies."

Hereby, I would like to alert you that Amazon does not comply with this, as it doesn't list its membership in the following organisations: Centre on Regulation in Europe (CERRE). According to the websites of these organisations however Amazon is a member.  
We would welcome if you consider the fact that the information provided by Amazon is incomplete.  
Kind regards,  
Max Bank (LobbyControl)

## **EuroISPA**

Dear Register Secretariat Team,

according to the Register's code of conduct, organisations should "ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading."

Hereby, I would like to alert you that the European Internet Services Providers' Association lists lobby expenses of less than 10.000 Euros only. This sounds unrealistically low when you consider that according to the EuroISPA website there are at least three people at the association doing advocacy work towards the EU-institutions (<https://www.euroispa.org/about/who-we-are/#secretariat>).

We would welcome if you take note of this and ask EuroISPA to double-check the expenses they have listed in their transparency register entry.

Kind regards and thanks in advance,  
Max Bank (LobbyControl)