

New and Improved?

Why the EU Lobby register still fails to deliver



Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU)

January 2015



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ALTER-EU is a coalition of over 200 civil society groups and trade unions concerned with the increasing influence exerted by corporate lobbyists on the political agenda in Europe. ALTER-EU ran the Politics for People campaign at the recent EU elections which gained the support of 180 MEPs, all of whom have pledged to “stand-up against the excessive lobbying influence of banks and big business”.

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Executive summary

This new research, published by the Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU), shows how the voluntary approach to EU lobby transparency regulation fails to provide citizens with an accurate picture of the lobby scene in Brussels. Some of the main groups that are actively lobbying the EU institutions have still not registered in the EU's Transparency Register. These include:

- ▶ Financial lobbyists such as Standard & Poors, City of London Corporation and Credit Suisse;
- ▶ Lobby consultancies, such as Whyte Corporate Affairs;
- ▶ Law firms such as Covington & Burling and Freshfields Bruckhaus Deringer;
- ▶ Major corporations such as Electrabel, Anglo American and General Motors.

Meanwhile, too many of the register's entries are unreliable: lobby firms and law firms fail to disclose clients - which is a clear breach of the rules for the register - or they mask their identities behind meaningless acronyms. In addition lobby spending and lobbyist numbers are often under-reported, and there are far too many implausible entries. For example:

- ▶ Google and Novartis list more European Parliament entry passes than the total number of lobbyists they say they employ, which cannot be correct according to the register rules.
- ▶ Goldman Sachs and Honeywell under-report their lobby expenditures as the amounts they declare are less than the amounts they have paid to lobby consultancies.
- ▶ Meanwhile, some entries are simply absurd: BearingPoint, a professional consultancy, states that its lobby turnover is a staggering €552,795,000!

The European Parliament, alongside transparency campaigners including ALTER-EU, have long demanded a tougher approach to EU lobby regulation. It is now time for the European Commission to take up this challenge. The revamped register currently being launched, will not significantly improve the accuracy of the lobby data (as outlined in this report) and will not enable any interested person to really know who is lobbying whom, and how much is being spent on lobbying in Brussels - surely the key tests of any proper transparency register. Despite numerous commitments to improve the poor quality of information in the register, too little has happened and even the most obvious absurd entries have not been corrected.

The Juncker Commission is now proposing to introduce a so-called mandatory lobby register via an inter-institutional agreement. This is very misleading, as such an inter-institutional agreement would not be binding on lobbyists and thus not properly mandatory.

What is needed is a proposal for EU legislation to introduce a legally-binding EU lobby register, which would ensure that lobbyists are obliged to be fully open and honest about all their lobbying activities. This would allow the register secretariat to investigate incorrect and misleading entries, and ensure that effective sanctions can be applied in cases of breaches of the register rules. That is the only way to ensure that we know who is influencing the decisions coming out of Brussels, which affect EU citizens' daily lives.

Introduction

In 2011 the European Commission and Parliament launched the joint lobby transparency register, which replaced the Commission's Register of Interest Representatives that was in place from 2008-2011. Today the register lists nearly 7500 individuals and organisations and Maroš Šefčovič, the previous Commissioner responsible for the register, described it as being "... at the leading edge of most public bodies in the world".¹ This statement is at odds with the reality of the register, which lags behind other lobbying disclosure systems operating around the world, particularly as the EU register is based on a voluntary approach; and there are no sanctions for non-registration.

In recent months, the Juncker Commission has announced steps to incentivise registration under the voluntary approach. Now, for example, unregistered lobbyists cannot meet with Commissioners². Commission Vice President Frans Timmermans has also promised to introduce a draft inter-institutional agreement for a "mandatory" lobby register³ with the European Parliament, and will seek to bring the European Council into the framework.

Yet Timmermans' proposal would only create mandatory rules for the EU institutions, and lobbyists themselves would not be affected. This is hugely problematic because it is vital that lobbyists who do not register, who act unscrupulously or who provide inaccurate or misleading information in the register, face effective fines or other meaningful sanctions. The only way to deliver this change is through EU legislation. Legislation would also allow for proper enforcement mechanisms to verify information provided in the register. In addition, a legally-binding register backed by legislation would be permanent and therefore not dependent on the whim of current and future political leaders. The legislative process also provides a greater scope for public participation than an inter-institutional agreement.

The transparency register is now being re-launched, with much fanfare but with very limited improvements. The changes represent a missed opportunity and a step backwards for transparency. The main changes expected are as follows:

- ▶ Bandwidths for disclosing lobby expenditure and turnover will be adjusted and now will be far wider than before which will provide even less transparency on financial disclosure.
- ▶ Lobby consultancies will now be asked to provide a figure for their annual turnover on lobbying, although again the bandwidths for declaring that turnover will be too wide.

- ▶ New rules will provide slightly improved data on the overall number of lobbyists, as registrants will now be able to differentiate between full time and part time lobbyists. But there will still be no requirement to name all these individuals.
- ▶ New rules should make it easier for lobbyists to indicate their lobbying activities including membership of Commission expert groups, parliamentary inter-groups etc. However, lobbyists will still not be required to list the specific dossiers that they work on e.g. TTIP.
- ▶ The new lobby transparency guidelines now say that "it is recommended to review and update your entry, as needed, at least three times a year", but declarations still only need to be updated once a year, and at a different date for each registrant, making the data difficult to compare.

Overall, these minimal changes to the register represent a **lack of ambition in the introduction of new rules** to secure greater transparency from lobbyists and interest representatives working at the EU level.

Like ALTER-EU, the European Parliament has consistently urged the Commission to toughen up the lobby regulation regime. In April 2014 it called for the Commission "to submit, by the end of 2016, a legislative proposal for the establishment of a mandatory register"⁴. It also passed similar resolutions in 2008 and 2011. The European Ombudsman has also recently publicly called for a mandatory lobby register to be enacted through a legislative proposal.⁵

ALTER-EU calls for the following urgent changes to the EU lobby transparency regime:

- ▶ The European Commission should make a legislative proposal for a legally-binding lobby register by the end of 2015, with the aim of the new register being operational by mid-2017
- ▶ Law firms' lobby work must be explicitly included
- ▶ Data disclosure rules must be significantly tightened-up including: far narrower bandwidths for expenditure and sources of income; listing of the names of all lobby staff; precise details of the dossiers worked on; and details of other lobby entities used such as consultancies, coalitions, etc
- ▶ Registrants should be required to file bi-annual reports of lobbying activity
- ▶ The code of conduct for lobbyists should prevent lobbies from hiring former commissioners or other high-level Commission officials for three years after they leave office. All registrants should be transparent about 'revolving door' recruitment.

Finally, until a legally binding lobby register enters into force, we propose that both the Parliament and the Commission set-up and enforce a series of incentives in order to maximise compliance with the current voluntary register, including:

- ▶ An obligation for all Commission staff not to meet unregistered lobbyists;
- ▶ Exclusion from participation in expert groups for unregistered lobby groups;
- ▶ Commission staff, commissioners and MEPs do not attend events and activities organised or sponsored by unregistered lobby groups.

Active lobbies missing from the EU transparency register

As the EU transparency register (hereafter the EUTR) is voluntary, many large and small entities engaged in lobbying activities towards the EU institutions have not registered. The Commission and the Parliament have long talked about introducing incentives to encourage lobby groups to sign up to the register but very few have so far materialised. An exception was the decision in November 2014 that EU commissioners should not meet with unregistered lobbyists.⁶ However, there is no formal oversight of such practice, nor are there sanctions if a commissioner fails to disclose such meetings. In addition, meetings with commissioners make up a relatively small number of the total number of lobby meetings held with the Commission, so non-registered lobbyists are still free to meet with lower level officials without public scrutiny.

Below we highlight a range of lobby organisations that continue to conduct lobbying activities in Brussels but remain outside the lobby transparency framework. (see annex 1 for further examples)

All EUTR entries or absences referred to below are only accurate as of the date at which they were accessed. This is specified in each individual reference or in the text.

1.1 Financial actors that prefer to lobby in the shadows

Banks and financial services companies have a lot to lose, or gain, from financial regulation, much of which is developed at the EU level. Since the collapse of global markets in 2008, the European Commission, member state governments and MEPs promised to overhaul the EU rules on financial markets; all key pieces of EU legislation in the field were to be reviewed and new laws were to be adopted. This has kept the massive financial lobby in Brussels very busy.

Research by Corporate Europe Observatory published in April 2014 showed that, based on the figures in the EUTR at the time, the financial industry spends more than €120 million per year on lobbying in Brussels and

employs more than 1700 lobbyists.⁷ Today's research reveals that some key financial actors known to be lobbying at the EU level remain absent from the EUTR (as of 14 January 2015). This means that this hugely important area of public policy, which is traditionally complex and difficult for citizens to engage with, is still subject to secretive lobbying by corporate interests.

For example:

- ▶ The **City of London Corporation** held a lobby meeting with UK Conservative MEP Emma McClarkin in June 2014 concerning financial services regulation; met with Conservative MEP Kay Swinburne at the Future of London dinner in January 2014⁸; and had a lobby meeting with the Commission's internal market and services directorate (DG MARKT) in April 2014.⁹ Despite this, the City of London is not registered in the EUTR.
- ▶ **Credit Suisse** hired Fleishman-Hillard for €200,000 - €250,000 to lobby for it in 2013.¹⁰ It was also engaged in direct lobbying itself, having held meetings with DG MARKT in February, March and April 2014.¹¹ If Credit Suisse is involved in lobbying activities, it should be registered in the EUTR.
- ▶ **Standard & Poors** paid lobby consultancy Fleishman-Hillard €250,000 - €300,000 in 2013, and had a direct lobby meeting with at least one MEP in March 2014, the UK Conservative MEP Kay Swinburne, regarding the stability of market infrastructure.¹² This means that it should also be registered in the EUTR.

1.2 Lobby consultancies that refuse to be transparent

If any group of lobbyists should be signed-up to the EUTR it is the professional consultancies and lobby firms for whom the lobbying of the EU institutions is their core bread-and-butter business. Yet it is remarkable that a number remain absent from the EUTR as of 14 January 2015, despite being active lobbyists at the EU level. This means that there is little or no transparency about their lobbying activities or clients. The

lobby consultancies that have still not signed up to the Transparency register include:

- ▶ **EUTOP International**, a Berlin-based lobby agency with at least five lobbyists, which offers “*representations of interests of private enterprises, associations and organisations towards the institutions of the European Union*”.¹³
- ▶ **Ketchum**, a globally-active public relations firm whose Brussels office offers to help clients “*gain support from market, political and internal stakeholders*” with the help of its “*in-depth understanding of business and politics – and the interaction between the two*”.¹⁴
- ▶ **PACT European Affairs**, whose Brussels-based consultancy service offers clients help with lobbying and strategy including “*new lobbying tools and new lobbying vehicles*”.¹⁵
- ▶ **Whyte Corporate Affairs**, a Brussels-based public affairs firm that boasts of its “*Lobbying activities regarding the regulation of a range of consumer products and professional services... [and] permitting procedures for a broad range of industrial, retail, real estate and energy companies*” as well as “*Lobbying campaigns regarding corporate tax, excise and labour law for various multinational companies*”. Its website refers to clients IKEA, Danone and Thalys.¹⁶
- ▶ Head-quartered in Brussels, lobby consultancy **Eacon Group** states on its website that “*Transparency and confidentiality form the foundation of Eacon’s success*”. It lists 40 per cent of its clients as business and trade associations and 25 per cent as corporate.¹⁷

1.3 Law firms that don’t do voluntary transparency

Law firms have historically been reluctant to sign up to the EUTR. Even though many law firms offer lobbying services to clients that fall within the EU’s definition of “interest representation”, such as trying to directly or indirectly influence policies or legislation, many big firms have refused to sign-up. Sometimes law firms cite professional rules regarding client confidentiality as an excuse, even though the EUTR covers lobbying activity rather than legal work.

Examples of lobbying law firms absent from the EUTR (as of 14 January 2015) include:

- ▶ **Covington & Burling** which boasts government affairs & EU policy expertise and claims that it is “*one of the leading law firms in Brussels helping to ensure that industry’s voice is heard in the EU legislative process and in administrative decision making*”. It also brags that its lobbying capabilities are “greatly enhanced” by its employment of former MEP and Vice President of the European People’s Party (EPP) Wim van Velzen, as its senior European Policy Advisor.¹⁸
- ▶ **Freshfields Bruckhaus Deringer** advertises a Brussels-based EU regulatory and public affairs practice which focuses “*on the interface between*

law, politics and business” and “*helps clients to manage pro-actively all aspects of the EU regulatory environment.*”¹⁹

- ▶ **Hogan Lovells** assists its clients “*to protect and promote their interests at the intersection of the public and private sectors*”, with a dedicated UK & EU public law and policy service which includes advising “*businesses and trade associations on engaging effectively with...EU government departments*”.²⁰
- ▶ **Clifford Chance** is the law firm whose employee Michel Petite (former head of the Commission’s Legal Service) has been embroiled in several lobbying scandals over the last few years, leading to his departure from the Commission’s ad hoc ethical committee. The firm is still not in the EUTR.²¹ Interestingly, while Clifford Chance’s website previously detailed its ‘political advocacy strategy’ department which offered clients assistance in “*shaping law and policy as it evolves*”²², all reference to explicit lobbying services seem to have been removed from its revamped website. Despite this, Michel Petite continues to produce weekly ‘EU political updates’ and Phillip Souta, Clifford Chance’s head of UK public policy, “*provides strategic advice to clients in anticipating, understanding and influencing legislative and regulatory developments as well as other governmental activities in the UK and across the EU*” and “*works closely with the public policy teams in Paris and Brussels.*”²³

1.4 Big companies that have failed to sign up

The reality of the concentration of regulatory and legislative powers at the EU level, which cover many policy areas, means that almost all large EU corporations are likely to carry out some form of lobbying of the EU institutions and should therefore be in the EUTR.

However, our research shows that many corporations that are actively lobbying the EU institutions, either directly or through a lobby firm, are not in the EUTR. The following multinationals, for example, all hired Brussels consultancies to lobby for them but, as of 14 January 2015, have not signed up to the EUTR:

- ▶ Belgian energy company **Electrabel** paid PA Europe €50,000 - €100,000 in 2013 to lobby on its behalf.²⁴
- ▶ Mining giant **Anglo American** hired G Plus Ltd for less than €50,000 and Hanover Communications International for less than €50,000 in 2013, spending up to €100,000 on lobby consultancies.²⁵
- ▶ Car corporation **General Motors** hired Fleishman-Hillard in 2013 for less than €50,000.²⁶

In annex 1, further examples are presented of organisations which ALTER-EU considers to be actively lobbying at the EU level but which despite this, are still missing from the EUTR.

Lack of enforcement of basic EU Transparency Register rules

While the non-registration of many lobbying organisations is a major problem with the EUTR, there are other concerns with the current system. Many organisations are registered, but fail to provide full and accurate lobby data in line with the rules of the lobby register.

This problem is more than a simple bureaucratic failure to follow the rules: it means that data is opaque, confusing, unclear, and does not provide the clear picture of lobbying in Brussels which is required for citizens to hold the EU institutions to account.

Overall, this reflects the lack of capacity and political of those running the lobby register to monitor lobby data and to take action when the rules are breached. It also highlights the inadequacy of the voluntary model as the register secretariat simply has no legal means to compel registrants to provide detailed information about their lobby expenses and activities. The voluntary nature of the register also makes strong and effective sanctions in case of breaches of the register rules impossible.

2.1 Undisclosed clients

The EUTR requires that all professional consultancies and law firms disclose the clients for whom they carry out lobbying, including turnover per client (reported in bandwidths). Moreover, the EUTR guidelines explicitly state that “*Declarations entered without the full list of the individual clients or with an unidentifiable collective designation such as “corporate” “other small clients” “confidential information” or similar do not meet the requirements.”*²⁷

Despite this, around 150 lobby consultancies, law firms or consultants have improperly listed clients as “confidential”, “not applicable”, “N/A”, “none”, “customers”, “corporate sector”, “various” etc. This is a clear breach of the rules on disclosing clients, and one that undermines lobby transparency as it makes it impossible to see who is lobbying on behalf of whom.

Law firms that offer lobbying services to clients are one of the main culprits listing clients as “confidential”, such as **A. Silvestro** whose share of turnover related to lobbying the EU institutions on behalf of clients was €100,000 - €150,000 in 2013.²⁸ Other law firms listing confidential clients include **CIEL & CO**, **MENA Chambers** and **Bird & Bird LLP**.²⁹ The latter declares 30 persons engaged in activities under the scope of the EUTR and a lobbying turnover of €10 million, yet it only states that it provides “legal services to clients in the field of EU law”. Clients are listed as “CONFIDENTIAL”.

Professional consultancy **Lake Isle M&A Incorporated** and consultant **Petr Kolar** also declare their clients as confidential.³⁰ Lobby firm **MAQASSAR** states “investors” and “corporates” as its clients; consultants **TECHLIVE247** and **Truenology Technologies** state “customers”; and consultancy **NineSigma Europe BVBA**, which declares €2,250,000 – € 2,500,000 EU lobbying turnover, states simply “customers want to remain unknown”.³¹

See Annex 2 for the full list of lobby consultancies with undeclared clients.

2.2 Under-reporting lobby expenditure

When disclosing lobbying expenditure, the EUTR rules are very clear that the cost estimate must include “*outsourced activity costs, consulting fees and subcontracted activities related to activities falling under the scope of the Register.*” Furthermore, the rules note that “*the declaration made in the Register by the contract consultant itself doesn’t exempt the entity from including these fees in its own financial declaration.*”³² Despite this, some very high profile organisations have declared their lobbying expenditure (which also includes staff time, office costs, events, advocacy campaigns, etc³³) to be, in total, less than they are apparently paying lobby consultancies to lobby the EU on their behalf.

One of the most glaring examples of this is financial titan **Goldman Sachs**, which was a long-time absentee from the EUTR until November 2014. This coincides with the European Commission announcement that Commissioners should not meet with unregistered lobbyists. Goldman Sachs declares that it spent under €50,000 on lobbying the EU in 2013, but it is also listed as a client of lobby firm Kreab Gavin Anderson, paying them €200,000 - €250,000 in the same year.³⁴ Goldman Sachs is also listed as a client of Afore Consulting, paying them a fee of €250,000 - €300,000 for the year mid-2013 to mid-2014. This obvious and significant discrepancy has led to Goldman Sachs' EUTR entry being the subject of a complaint, filed before the Transparency Register Secretariat by LobbyControl, Friends of the Earth Europe, and Corporate Europe Observatory.

Another example of financial under-reporting is **Bloomberg** which registered on 22 January 2015. It registered a lobby expenditure of less than €50,000 for 2013 but hired lobby firm Sovereign Strategy for €100,000 - €150,000 in the same year.³⁵

Other examples include US consumer technology and defence multinational, **Honeywell**.³⁶ Taking the lowest value of each client fee range, Honeywell paid at least €450,000 to EU lobby consultancies, yet it declares a total EU lobby expenditure in 2013 of only €250,000 - €300,000. Honeywell employed lobby firms ADS Insight, FTI Consulting Belgium, Interel European Affairs, Hering Schuppener Consulting Corporate Affairs & Public Strategies GmbH, FIPRA International Limited and Fleishman-Hillard in 2013.³⁷

Pharmaceuticals multinational **Shire** declares that it spent €200,000 - €250,000 on lobbying in 2013,³⁸ but in the same year was a client of five lobby consultancies - FTI Consulting Belgium, Rohde Public Policy, Hill & Knowlton International Belgium, Just Health Communications Ltd and Hanover Communications International.³⁹ It paid these consultancies at least €450,000.

2.3 Outdated financial data

Another problem with the data in the EUTR is a lack of consistency regarding the year to which financial data refers (i.e. how much is spent on lobbying, or how much income was received from different clients). This is partly because many entries contain outdated financial data. For example, the entry of multinational financial services firm **Prudential**, despite being updated in December 2014, includes financial data from 2009.⁴⁰ Both the **European Landowners' Organization** (last updated February 2014) and lobby firm **Ogilvy Group** (last updated June 2014) include financial data from 2011.⁴¹ Agri-business giant **Monsanto's** financial data is from the year to August 2012, despite its last annual update being May 2014, less than one year ago.⁴²

Less extreme, but still problematic, are the many entries that have financial data from 2012, including petroleum and energy lobby **Aussenhandelsverband fuer Mineralöl und Energie (AFM+E)** and the **Cyprus Chamber of Commerce and Industry**.⁴³

2.4 Unexplained acronyms listed as clients

The rules of the EUTR very clearly state that: *“For the declaration of clients (and of networks and memberships), acronyms and abbreviations alone are not satisfactory. Their full names should be entered. Acronyms are welcome but only as a complement.”*⁴⁴

Yet more than 200 (204) lobby consultancies, law firms or consultants in the EUTR include clients that are identified as acronyms, a clear breach of this very simple rule, and which creates significant ambiguity about which organisation they refer to. For example, lobby consultancies **Interel European Affairs**, **Landmarks** and **Europe Analytica** all list the acronym **CEPI** as a client. In the EUTR itself, there are three organisations that list their acronym as CEPI: Confederation of European Paper Industries, Conseil Européen des Professions Immobilières, and the European Coordination of Independent Producers.⁴⁵

Similarly, both **Access Partnership** and **Instinctif Partners (Brussels)** list **BSA** as a client, while in the EUTR two organisations are listed with BSA as their acronym: the Software Alliance and the Building Societies Association.⁴⁶

Major professional lobby consultancies listing such acronyms for clients include:

- ▶ **Kreab Gavin Anderson** (FAM, ICI, LKAB, UBS, WMBA, EDF)
- ▶ **Fleishman-Hillard** (GERG, GIIGNL, ICA, NATS, NETS, NXP, MEDEL, ICAP)
- ▶ **Interel European Affairs** (CEPI, FFPI, GNT, ISPO, UPS, WBCSD, IEEE, MWV)
- ▶ **Luther Pendragon Brussels** (ATOC, NATS, CLIA, UKMPG)
- ▶ **Rohde Public Policy** (EAMBES, IBA, IPOPI, VPH, ESMO, PPTA, BD)
- ▶ **Instinctif Partners (Brussels)** (AWCS, BSA, EPBA, WOCCU, GLI, GSMA, RGA)
- ▶ **ESL & Network European Affairs** (SES, ECPA, ENEL, EPIA, EUTELSAT, FFSA, LTC, ETI)
- ▶ **EURALIA** (AFTI, AGEA, ASF, CNEFAF, CNES, NFID, SNVEL, UEVP)

In total, more than 400 (409) clients are given only as acronyms in the EUTR. See Annex 3 for the full list.

2.5 More lobbyists with Parliamentary passes than total lobbyists

The EUTR requires registrants to provide two numbers for lobbyists, one for the total number of people engaged in activities falling under the scope of the register, and another for the number of representatives with an accredited European Parliament lobby pass. Because of the way that these figures are calculated, the number of the latter should not be greater than the number of the former. This is because *“any person benefiting from an accreditation for access to the European Parliament’s buildings should be counted as a full 1 person/year in this estimate.”*⁴⁷ The other staff numbers can be calculated on a pro rata basis.

Despite this, various entries record more lobbyists accredited for passes to the European Parliament than the total number of lobbyists listed. One example is **Google’s** entry, which states that it has seven lobbyists, immediately followed by a list of eight named lobbyists with Parliamentary passes.⁴⁸ Similarly, pharmaceutical giant **Novartis** states that it has six lobbyists while eight are named as accredited to the European Parliament.⁴⁹

2.6 Other ‘dodgy’ data

There are many other problematic entries in the EUTR, which are too numerous to list here, but which could and should be easily rectified. These include:

- ▶ French union **Syndicat Formation et Développement CFE-CGC** declares 500 lobbyists.⁵⁰
- ▶ Consultancy firm **Globe Consultants International Ltd** lists its share of turnover from EU lobbying on behalf of clients as €0, then goes on to list a lobby client, the Government of Trinidad and Tobago, as generating a turnover of €350,000 - €400,000.⁵¹
- ▶ Lobby consultancy **MUST & Partners** lists its client-based lobby turnover as €30,000, but then goes on to name one client generating €50,000 - €100,000 (ie. at least €20,000 more than its total lobby turnover). This client is called “Must”... which would appear to be itself.⁵²
- ▶ Public affairs consultancy **MWW** is registered twice, once under the registration no. 490432812998-80, registered 27/02/14, and once under the no. 370485213446-88, registered 14/04/14. Both list one client and have the same contact and details.⁵³
- ▶ **Bearing Point**, a professional consultancy which registered on 02/12/14, declares that it has zero lobbyists but states that its turnover related to representing interests to EU institutions on behalf of clients is a staggering €552,795,000.⁵⁴ Its only client is listed as “EC”, which presumably is the European Commission. This bizarre declaration from a firm that specialises in management and technology training is augmented by the statement “We are not a lobby firm” which leads to the question why it signed up to the EUTR, and even more confusingly, why is it listed as one of its biggest spenders.

Endnotes

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- ¹⁵ PACT European Affairs, <http://www.pacteurope.eu/consulting/> and <http://www.pacteurope.eu/consulting/lobbying-strategy/>
- ¹⁶ Whyte Corporate Affairs, <http://www.whyte.be/credentials/>
- ¹⁷ Eacon Group, <http://www.eaongroup.eu/compliance/> and <http://www.eaongroup.eu/about-us/clients/>. Eacon's website does not seem to presently be very active (e.g. no news stories since 2012, but its twitter and facebook profiles have both been used in 2014 <https://twitter.com/eaongroup> and <https://www.facebook.com/eaongroup>
- ¹⁸ Covington & Burling, <http://www.cov.com/brussels/>
- ¹⁹ Freshfields Bruckhaus Deringer, http://www.freshfields.com/en/belgium/Freshfields_in_Belgium/
- ²⁰ Hogan Lovells, <http://www.hoganlovells.com/public-law/>
- ²¹ Corporate Europe Observatory, NGOs welcome replacement of controversial Michel Petite; Commission needs a far stricter approach to conflicts of interests, December 18th 2013, <http://corporateeurope.org/pressreleases/2013/12/ngos-welcome-replacement-controversial-michel-petite-commission-needs-far> and RevolvingDoorWatch: Michel Petite, <http://corporateeurope.org/revolvingdoorwatch/cases/michel-petite>
- ²² Clifford Chance, https://web.archive.org/web/20131110040230/http://www.cliffordchance.com/legal_area/public_policy/political_advocacy_strategy.html, This page was last archived by the Internet Archive on 10 November 2013
- ²³ Clifford Chance, Michel Petite http://www.cliffordchance.com/people_and_places/people/lawyers/fr/michel_petite.html and Phillip Souta http://www.cliffordchance.com/people_and_places/people/lawyers/gb/phillip_souta.html accessed 14 January 2015
- ²⁴ EUTR, PA Europe (client Electrabel) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=11064742654-42>, as of 14/01/15
- ²⁵ EUTR, entries as of 14/01/15, G Plus Ltd (client Anglo American) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=7223777790-86>, Hanover Communications International (client Anglo American) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=712987314570-57>

- ²⁶ EUTR, Fleishman-Hillard (client General Motors) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=56047191389-84>, as of 14/01/15
- ²⁷ Transparency Register Compliance Guidelines, Edition N° 3 – 04 October 2012, http://ec.europa.eu/transparencyregister/info/openFile.do?fileName=guideline_en.pdf
- ²⁸ EUTR, A. Silvestro <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=360495914648-79>, as of 19/01/15
- ²⁹ EUTR, entries as of 19/01/15, CIEL & CO, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=831292312708-90>, MENA Chambers <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=618971710684-92>, Bird & Bird LLP <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=334773011160-57>
- ³⁰ EUTR, entries as of 19/01/15, Lake Isle M&A Incorporated <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=87637846272-89>, Petr Kolar, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=237732715185-74>
- ³¹ EUTR, entries as of 19/01/15, MAQASSAR <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=43070944601-40>, TECHLIVE247 <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=713514111329-40>, Truenology Technologies <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=258078711174-09>, NineSigma Europe BVBA <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=07807936046-22>. This latter entry lists under clients < € 50000 “Klanten willen onbekend blijven” which is translated from the Dutch to be “Customers want to remain unknown”
- ³² EUTR Compliance Guidelines, *ibid*.
- ³³ Estimate of costs must include staff costs, administrative costs (including office space in Brussels), outsourced activity costs, consulting fees and subcontracted activities, in-house operational expenditures, and full membership fees, etc. For more details, see Transparency Register Compliance Guidelines, *ibid*.
- ³⁴ EUTR, entries as of 14/01/15, Goldman Sachs <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=701266814986-18>, Afore Consulting <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=03013154889-05>, Kreab Gavin Anderson <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=1078390517-54>
- ³⁵ EUTR, Bloomberg entry as of 22 January 2015: <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=941851915685-19> EUTR, Sovereign Strategy (client Bloomberg) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=807262215053-09>, as of 14/01/15
- ³⁶ EUTR, Honeywell, last updated 27/01/14 <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=75311753240-67>, as of 14/01/15
- ³⁷ EUTR, entries as of 14/01/15, ADS Insight was paid 50,000 € - 100,000 €. by Honeywell in 2013 <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=02762144321-07>, FTI Consulting Belgium 350,000 € - 400,000 €. <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=29896393398-67>, Interel European Affairs less than 50,000 € <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=7028457765-59>, Hering Schuppener Consulting Corporate Affairs & Public Strategies GmbH less than 50,000 € <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=578189413297-97>, FIPRA International Limited 50,000 € - 100,000 €, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=58746194306-23>, Fleishman-Hillard 50000 € - 100000 € <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=56047191389-84>
- ³⁸ EUTR, Shire, last updated 07/04/14, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=60329985751-43>, as of 14/01/15
- ³⁹ EUTR, entries as of 14/01/15, FTI Consulting Belgium paid 100,000 € - 150000 € by Shire in 2013 <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=29896393398-67>, Rohde Public Policy less than 50,000 € <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=96530144280-28>, Hill & Knowlton International Belgium less than 50,000 € <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=3183894853-03>, Just Health Communications Ltd 300,000 € - 350,000 € <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=413784411458-52>, Hanover Communications International 50,000 € - 100,000 €. 2013 <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=712987314570-57>
- ⁴⁰ EUTR, Prudential, entry as of 14/01/15, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=65288482768-64>
- ⁴¹ EUTR, entries as of 14/01/15, European Landowners' Organization asbl <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=36063991244-88>, Ogilvy Group <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=81904791851-37>
- ⁴² EUTR, Monsanto, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=678841411135-35>, as of 14/01/15,
- ⁴³ EUTR, entries as of 14/01/15, AFM+E <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=33629954785-84>, Cyprus Chamber of Commerce: <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=3199368915-29>

- ⁴⁴ Transparency Register Compliance Guidelines, Edition N° 3 – 04 October 2012, http://ec.europa.eu/transparencyregister/info/openFile.do?fileName=guideline_en.pdf
- ⁴⁵ EUTR, entries as of 14/01/15, Confederation of European Paper Industries <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=72279144480-58>, Conseil européen des Professions immobilières <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=1094652600-90>, European Coordination of Independent Producers <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=59052572261-62>
- ⁴⁶ EUTR, entries as of 14/01/15, BSA | The Software Alliance <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=75039383277-48> and the Building Societies Association <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=924933110421-64>
- ⁴⁷ EUTR Compliance Guidelines, *ibid.*
- ⁴⁸ EUTR, Google, entry last updated 29/03/14, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=03181945560-59>, as of 14/01/15
- ⁴⁹ EUTR, Novartis, entry last updated 01/04/14, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=91269481588-28>, as of 14/01/15
- ⁵⁰ EUTR, entries as of 20/01/15, Syndicat Formation et Développement CFE-CGC <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=564787713581-89>
- ⁵¹ EUTR, Globe Consultants International Ltd, last updated 16/12/13, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=106129112446-14>, as of 14/01/15
- ⁵² EUTR, MUST & Partners, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=080551814378-33&isListLobbyistView=true>, as of 19/01/15
- ⁵³ EUTR, MWW <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=490432812998-80&isListLobbyistView=true> and <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=370485213446-88&isListLobbyistView=true>, as of 19/01/15
- ⁵⁴ EUTR, Bearing Point, last updated 02/12/14, <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=230831915098-10>, as of 19/01/15

Other major omissions from the EU transparency register

The reality of the concentration of regulatory and legislative powers at the EU level, which cover many policy areas, means that almost all large EU corporations are likely to carry out some form of lobbying of the EU institutions and should therefore be in the EUTR. However, our research shows that many corporations that are actively lobbying the EU institutions directly, still remain absent. In ALTER-EU's view, the following companies should clearly be included in the register:

- ▶ Japanese food, chemical and pharmaceutical corporation Ajinomoto hired PA Europe for €150,000 - €200,000 and The Huggard Consulting Group for less than €50,000 in 2013, and paid 2m communication less than €50,000 from three different subsidiaries for the period 04/2013 - 03/2014 (Ajinomoto SAS, Ajinomoto SW Europe, and Ajinomoto Inc), likely spending several hundred thousand euros on EU lobbying but failing to sign up to the EUTR.¹
- ▶ Construction and materials firm the Vinci Group hired Athenora Consulting for €50,000 - €100,000 in 2013.²
- ▶ Electronics firm Prysmian is listed as a client of APCO Worldwide, paying them €50,000 - €100,000 in 2012.³
- ▶ Security firm Northrop Grumman International Corp employed Hill & Knowlton International Belgium for less than €50,000 in 2013.⁴
- ▶ Gas firm Linde gas (subsidiary of chemicals giant Linde) hired Kreab Gavin Anderson for less than €50,000 in 2013.⁵
- ▶ Telecommunications firm Swisscom hired Furrer. Hugi&Partner AG in 2013 for less than €50,000.⁶
- ▶ British supermarket Tesco. The head of EU and international affairs for Tesco met with conservative UK MEP Ashley Fox in January 2014 regarding the payment services directive (PSD II) and the regulation on multilateral interchange fees (MIF).⁷
- ▶ Danish trade, shipping and energy conglomerate Maersk has taken part in stakeholder meetings with the Commission on TTIP and meanwhile its chief executive is also the chairman of the trade and market access working group at the major lobby group the European round table of industrialists.⁸

In ALTER-EU's view, the following financial actors should also clearly be included in the register as they have all had recent lobby meetings with DG MARKT⁷:

- ▶ Swiss Bankers Association (ASB)
- ▶ FinansNorge
- ▶ European Banking Industry Committee (EBIC)

In ALTER-EU's view, a large number of law firms which carry out EU lobby work continue to remain absent from the EUTR, as of 14 January 2015, including:

- ▶ **Mayer Brown's** EU Law and Policy practice "*assists clients in navigating and shaping EU rules.*"¹¹
- ▶ **Keller Heckman's** Brussels office includes regulatory affairs experts and practices in 'Government Relations', combining "*legislative and political experience with significant regulatory and industry expertise*" to become highly successful "*in facilitating relationships between clients and...the European Union.*"¹²
- ▶ **Dentons'** Brussels office offers "*EU and international government affairs*", noting that Brussels is "*a hot spot for industry and business organizations operating within or dealing directly with the EU's decision-making bodies*".¹³
- ▶ **Field Fisher Waterhouse's** Brussels office, "*in the heart of the European Union*", advertises that "*we closely follow and influence the developments of European law.*"¹⁴

Notes

- ¹ EU transparency register (EUTR), entries as of 14/01/15
The Huggard Consulting Group (client Ajinomoto) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=650035611150-01>
PA Europe (client Ajinomoto Foods Europe) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=11064742654-42>
2 m communication (clients Ajinomoto SAS, Ajinomoto SW Europe, and Ajinomoto Inc) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=38786761555-02>
- ² EUTR, Athenora Consulting (client Vinci Group) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=79628773-02>, as of 14/01/15
- ³ EUTR, APCO Worldwide (client Prysmian) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=81995781088-41> as of 14/01/15
- ⁴ EUTR, Hill & Knowlton International Belgium (client Northrop Grumman) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=3183894853-03>, as of 14/01/15
- ⁵ EUTR, Kreab Gavin Anderson (client Linde gas) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=1078390517-54>, as of 14/01/15
- ⁶ EUTR, Furrer.Hugi&Partner AG (client Swisscom) <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=34425523314-13>, as of 14/01/15
- ⁷ TESCO Head of EU and International Affairs William Blomefield met with Conservative UK MEP Ashley Fox on 07/01/2014 in the context of PSD II + MIF working group, <http://conservativeeurope.com/Right%20to%20know/LOBBYING%20CONTACTS%20JAN%20-%20JUNE%202014%20FINAL2%2024%2010%202014.pdf> <https://www.linkedin.com/pub/william-blomefield/7/892/836>
- ⁸ <http://www.euractiv.com/sections/trade-industry/ttip-will-boost-europes-competitiveness-302956>
- ⁷ List of meetings released to Corporate Europe Observatory, July 2014, by DG MARKT of meetings with industry representatives since early 2013, see <http://corporateeurope.org/financial-lobby/2014/09/regulating-finance-necessary-hill-battle> and <http://www.asktheeu.org/en/request/1266/response/5068/attach/html/2/Copy%20of%20CEO%20list%20meetings.xls.html> EUTR, no entries found, as of 14/01/15
- ¹¹ Mayer Brown <http://www.mayerbrown.com/locations/Brussels/>
- ¹² Keller Heckman <http://www.khlaw.com/showlocation.aspx?Show=94> and <http://www.khlaw.com/showarea.aspx?Show=200>
- ¹³ Dentons <http://www.dentons.com/en/global-presence/europe/belgium/brussels.aspx>
- ¹⁴ Field Fisher Waterhouse <http://www.fieldfisher.com/offices/brussels>

Lobby consultancies, law firms or consultancies with undisclosed clients

This non-exhaustive list was compiled on 13 January 2015 from the Lobbyfacts.eu database. Lobbyfacts uses the database of the EU transparency register, but there may be a short delay of a day or two between the two. This list should therefore be considered accurate as of 13 January 2015, with a reasonable margin of error.

Name of Lobby Consultancy, Law firm or Consultant	Client name listed	Turnover from client (€)
& De Bandt Advocaten Avocats Attorneys Rechtsanwälte	N/A	Less than 50,000
A. Silvestro	Confidential	Less than 50,000
ABOGADOS MAJADAKING	N/A	Less than 50,000
ACIES Consulting Group, Brand NOVAMEN	xxx	Less than 50,000
ACTION PUBLIQUE	Néant - création en 2014 (None - created in 2014)	Less than 50,000
AISFOR Srl	----	Less than 50,000
Aleff Group	n/a	Less than 50,000
Alejandro Valdivia-Schneider	Open	Less than 50,000
ALLOULI Lamia	Aucun (None)	Less than 50,000
ALTHEIS LTD	Private companies and Public Bodies	Less than 50,000
Anastasia Chalkidou	None	Less than 50,000
Andrew Wigley	None	Less than 50,000
Antiterrorism Consulting	Other	Less than 50,000
APEL S.r.l.	Pubbliche Amministrazioni (Public administra- tions)	Less than 50,000
Argus Security Projects Ltd.	00000000	Less than 50,000
Asesores de Comunicación OSTOS, SOLA & Asociados SL	-	Less than 50,000
Astrée Avocats	NEANT (None)	Less than 50,000
Aviation Emissions Solutions Ltd.	All	Less than 50,000
Avv. Stefano Malinconico	Nessuno (No one)	Less than 50,000
Awridian Ltd	-	Less than 50,000
BANKINTER, S.A.	NINGUN CLIENTE (No clients)	Less than 50,000
BARROETA CONSULTORIA 2013, SL	-----	Less than 50,000
BIOTOPE	aucun (None)	Less than 50,000
Bird & Bird LLP	CONFIDENTIAL	Less than 50,000
BJD Reinsurance Consulting, SARL	Own Funds	Less than 50,000
BRAZZALE SPA	//	Less than 50,000
BTP Europroject Consulting	Varie iniziative Albania (Various initiatives Albania)	300000 to 350000
BTP Europroject Consulting	Varie iniziative Romania (Various initiatives Romania)	200000 to 250000
CABINET CAZEAU RONALD EXPERTISES	public, privé et syndic (Public, private and trustee)	Less than 50,000
Casey Campbell	not applicable	Less than 50,000
Centro Servizi Mercury s.a.s.	vari (Various)	Less than 50,000
CERES Certification of Environmental Standards GmbH	nicht anwendbar (Not applicable)	Less than 50,000
CHORUSCONSULT	geen (No)	Less than 50,000
CIEL & CO	Confidential	Less than 50,000
Common Rights	None	Less than 50,000

Name of Lobby Consultancy, Law firm or Consultant	Client name listed	Turnover from client (€)
COMPER FORMALCZYK & PARTNERS GENERAL PARTNERSHIP	nd	Less than 50,000
Context, international cooperation	other	Less than 50,000
contrast, European & Business Law	N/A	Less than 50,000
CORT Teaching Studio	0	Less than 50,000
Counterfactual	Not applicable	Less than 50,000
Dauginet advocaten	/	Less than 50,000
Dealers Negócios Internacionais	xxxx	Less than 50,000
Deloitte & Associés	NA	Less than 50,000
Deloitte LLP	NA	Less than 50,000
DS Avocats A.A.R.P.I	néant (None)	Less than 50,000
e-Line Consulting Marketing és Szolgáltató Kft.	-	Less than 50,000
Ecofys	None	Less than 50,000
Ecofys Netherlands B.V.	Various DG's	6750000 to 7000000
Edgar BV	na	Less than 50,000
Erika Casajoana	No public affairs in 2013	Less than 50,000
EU-Turn	Public institutions	300000 to 350000
Eunomia Research & Consulting Ltd	n/a	Less than 50,000
Eurasia Group Ltd	NA	Less than 50,000
eurolobby	startup	Less than 50,000
Euventures	NGO's and Öffentliche Einrichtungen (Public institutions)	Less than 50,000
Fabasoft Austria GmbH	-	Less than 50,000
Gestluz - Consultores de Gestão, Lda.	Public sector clients	Less than 50,000
GIGLIO & Partners	a	Less than 50,000
Gisèle VIANEY	pas de client en 2013 (No clients in 2013)	Less than 50,000
GoodWill Consulting Tendering Consultancy Limited Liability Company	Non applicable	Less than 50,000
Hart Energy	n/a	Less than 50,000
Immobiliere Ilr Sarl	privacy	1750000 to 2000000
Impulso Industrial Alternativo	-	Less than 50,000
Inline Policy	Not applicable	Less than 50,000
INNOPOLE SL	VARIAS EMPRESAS (Several companies)	50000 to 100000
Integrating Technology, IP & business models	N/A	Less than 50,000
Intelligentno savjetovanje d.o.o.	No representation	Less than 50,000
IRIS Consultancy and Logistics Limited	not applicable	Less than 50,000
J C Brennan Consultancy Ltd	NA	Less than 50,000
Jacques Y. LEIBOVITCH	N/A	Less than 50,000
JBS CONSULTANT	PARTICULIERS	Less than 50,000
JLAG LTD	Several Consultancies firms	50000 to 100000
JOKE Event AG	Kein Klient (No client)	Less than 50,000
Joulia-Paris Tamar	not applicable	Less than 50,000
KARL KRONER KG	Keine Angaben (No details)	Less than 50,000
Knowledge & Analysis LLP	n/a	Less than 50,000
Kosmonauta.net sp. z o.o.	N/A	Less than 50,000
Kumquat Consult	N/A	Less than 50,000
LABUNIQ Servicegesellschaft mbH	kein (No)	Less than 50,000
Lake Isle M&A Incorporated	Confidential	Less than 50,000
Lallemand & Legros	CONFIDENTIEL	Less than 50,000
Law Square	0	Less than 50,000
Leitner + Leitner	0	Less than 50,000
LeitnerLeitner	0	Less than 50,000
Llanbury Consulting Limited	-	Less than 50,000
LNE Group	-	Less than 50,000
Lobbyist Republique	N/A	Less than 50,000
Luca Muscelli Comunicazione	others	100000 to 150000
Magyar Hivatalos Közbeszerzési Tanácsadó Kft	Non Governmental	Less than 50,000
Mannov	N/A	Less than 50,000
Martin Matthew Farrugia	Various	Less than 50,000
Med-Q	none	Less than 50,000
Mediji i analize	private companies	Less than 50,000
MEKmedia GmbH	0	Less than 50,000
MENA Chambers	Confidential	Less than 50,000
Meridian VAT Processing International	N/A	Less than 50,000

Name of Lobby Consultancy, Law firm or Consultant	Client name listed	Turnover from client (€)
Métrologie et Gestion d'Environnement	others and Public sector	Less than 50,000
National Non-Food Crops Centre	no client	Less than 50,000
NineSigma Europe BVBA	Klanten willen onbekend blijven (Customers want to remain unknown)	Less than 50,000
NSF CYBERALL ACCESS	participants in our training	Less than 50,000
Obelis	not relevant see below	Less than 50,000
Orpheus Public Affairs SCS	Not applicable	Less than 50,000
Peaceful Fish Productions Ltd.	Various/Average	Less than 50,000
Petr Kolar	confidential information	50000 to 100000
Piquemal, Jean	None	Less than 50,000
prandp.de - PR & Policy Consulting Max Lindemann	Nicht vorhanden (Non-existent)	Less than 50,000
PricewaterhouseCoopers Tax Advisors & Accountants SRL	NA	Less than 50,000
PwCIL	NA	Less than 50,000
REBOOT	No Clients	Less than 50,000
Rechtsanwalt Dr. Anton Schaefer	keine Klienten (No clients)	Less than 50,000
rel.Co. Relations & Consulting	nessun cliente (No clients)	Less than 50,000
Sachs & Co & Sons	Pas de client (No clients)	Less than 50,000
Sea Teach S.L.	none	Less than 50,000
SELARL SOCIETE D'AVOCAT STEPHAN DENOYES	Aucun (None)	Less than 50,000
SIGNATURES	Aucun (None)	Less than 50,000
Soluciones en gestión Sanitarias SL	11	250000 to 300000
Song Splits Solutions LLC	Not Yet Available	Less than 50,000
Spanish VAT Services Asesores SL	N.A.	Less than 50,000
studio AF & Partners	Settore Corporate (Corporate sector)	200000 to 250000
studio AF & Partners	Settore Private (Private sector)	50000 to 100000
SYNDEX	Aucun (None)	Less than 50,000
Taj, Société d'Avocats	Néant (None)	Less than 50,000
TECHLIVE247	customers	Less than 50,000
TECNIN - Training S.A.	n/a	Less than 50,000
Thetis SPA	nessuno (No one)	Less than 50,000
Third-i bvba	none	Less than 50,000
Thomas Dillon	n/a and No activity in last 12 months	Less than 50,000
Tino Didriksen Consult	n/a	Less than 50,000
Tomas Horejsi	all clients	Less than 50,000
Transport Industry Driver Education Services Limited t/as Chequered Flag Training	N/A	Less than 50,000
Truenology Technologies	customers	Less than 50,000
Umberto Bono & Partners	Nessuno (No one)	Less than 50,000
VAHTA d.o.o.	none	Less than 50,000
VAT Consultants Ltd	None	Less than 50,000
VDI Zentrum Ressourceneffizienz GmbH	Nicht anwendbar, da kein Umsatz aus Lobbyarbeit. (Not applicable, as no revenue from lobbying.)	Less than 50,000
Ventures4Growth	n and z	Less than 50,000
VerifAvia SARL	various	Less than 50,000
VIANA	N/A	Less than 50,000
Vianey Gisèle	pas de client en 2013 (No clients in 2013)	Less than 50,000
Vito Rizzo	nessun cliente (No clients)	Less than 50,000
Vivid Economics Ltd	N/A	Less than 50,000
Wake App Health	Ninguno (None)	Less than 50,000
WeSaveYourCopyrights Rechtsanwalts-gesellschaft mbH	Kein Klient (No client)	Less than 50,000
Wikipiedra S.L.	No customer	Less than 50,000
X-Media Strategies	Diverse	100000 to 150000
Zabala Innovation Consulting	ninguno (None)	Less than 50,000
Zero-e b.v.	None	Less than 50,000

Lobby consultancies, law firms or consultants listing unexplained acronyms as clients

This non-exhaustive list was compiled on 13 January 2015 from the Lobbyfacts.eu database. Lobbyfacts uses the database of the EU transparency register, but there may be a short delay of a day or two between the two. This list should therefore be considered accurate as of 13 January 2015, with a reasonable margin of error. It includes acronyms listed as clients, without any further explanation, therefore being ambiguous. It is possible that some names that appear to be acronyms (ie. are in capitals and do not obviously form words) are in fact organisation names. This list does not include acronyms that are commonly recognised brand names eg. BMW, BP, KPMG etc

Name of lobby consultancy, law firm or consultant	Acronym	Turnover from client (€)
A² Policy Advice SPRL	JEITA	Less than 50,000
Access Partnership	ARM, BSA, ICANN	Less than 50,000
ACTION EUROPE	BFC	Less than 50,000
ACTION EUROPE	COFEPP, GBH	50000 to 100000
aerospace techniques engineering consulting & services	BIPE	Less than 50,000
AFA ITALIA	GPS	Less than 50,000
Agronovo Ecología, S.L.	INDEGAE	Less than 50,000
Alexandra Tamasan	GIZ	Less than 50,000
Alinea, Avocats à la Cour, SELARL	CIPALIN	Less than 50,000
Alonso & Asociados	EUPAVE, TU	Less than 50,000
ANCRE	GESAC	200000 to 250000
andrea valori	ICCROM, MIUR	Less than 50,000
ANDRES GOMEZ FUNES	FUE	Less than 50,000
ANTHENOR Public Affairs	AFIFAE, APIDIM, SIDIV	Less than 50,000
ANTON KERN D.I.	NS	Less than 50,000
Antonio Parodi	FNSI	Less than 50,000
APCO Worldwide	EFPIA	Less than 50,000
ARCA CONSORTIUM	CETM, CNTC	Less than 50,000
ARCHIMEDE CONSULTANCY SERVICES	CIAA, FEDIOL	Less than 50,000
ARCTURUS GROUP	CRCC, EFJ, OIA	Less than 50,000
ARCTURUS GROUP	ANIFELT, CBE, CNIV, ECRA, UFBJOP	50000 to 100000
Argentix Ltd	KTN	Less than 50,000
Athenora Consulting	CPCA, FNAM, MAIF, SBB	Less than 50,000
Athenora Consulting	MGEN	50000 to 100000
Atlantic Strategy Group SPRL	CDI	100000 to 150000
AVA & PARTNERS	ARA, RHI	Less than 50,000
Aviation Advocacy	CANSO	Less than 50,000
Aviation Strategy & Concepts	LOT	100000 to 150000
avv. Davide Maresca	CPM	Less than 50,000
Banelli d.o.o.	DKV	Less than 50,000
BAPCERES David	RG	Less than 50,000
BBM&Associates	NW	50000 to 100000
Becker Büttner Held	EREF	100000 to 150000
BergsteinWassermann	fetsa	Less than 50,000

Name of lobby consultancy, law firm or consultant	Acronym	Turnover from client (€)
Bertagni Consulting srl	AEMZU, FNDCV	Less than 50,000
Bibimbap Studio Lab	ANRS	Less than 50,000
Bio3 - Estudos e Projectos em Biologia e Valorização de Recursos Naturais	DHV	50000 to 100000
BIONTINO EUROPE	IBA, RATP	Less than 50,000
Biotech Consultants Ltd.	BTCL	Less than 50,000
BORENIUS	BBB	Less than 50,000
BRM-Europe	CNIEL, FEBE, FEPEX	Less than 50,000
BRM-Europe	AGFAE, FIAB	50000 to 100000
Brucovie Consult sprl	CASAG, EACON	Less than 50,000
Brunswick Group LLP	ICE	250000 to 300000
Bureau Brussels	AEDES, APG, DSM, ICS, IFV, MN, NVB, PGGM, TNT	Less than 50,000
Business Bridge Europe	EADS, EARSC, ESA, ESOA, GEF, OHB, SES	Less than 50,000
Business Bridge Europe	EPMA, RTE	50000 to 100000
bxl-law SPRL	EHPM, EVU	Less than 50,000
cabinet DN consulting sprl	EHIMA	100000 to 150000
cabinet DN consulting sprl	UPM	50000 to 100000
Cabinet Tauthui & Associés	COTE D'IVOIRE	450000 to 500000
CD ET ASSOCIES	CNCIF	Less than 50,000
CEC Government Relations (CZ)	CAMEP	Less than 50,000
Central Lobby Consultants Ltd	APCRG, CLAS, CTG, FHF	Less than 50,000
Central Lobby Consultants Ltd	Eurits	100000 to 150000
CHAPUS	TLF	Less than 50,000
Christopher Irwin	ERRAC, UIC	Less than 50,000
Cicero Consulting Limited	HFMA	50000 to 100000
Claudia Lorureiro Marinho, Unipessoal, Lda	abc	Less than 50,000
Climate Strategy & Partners	EURIMA	Less than 50,000
Club des Voitures Ecologiques / Green Car Club	AVEM, CFBP, CNR, COURB, DBT, EDF, Effia, ERDF, Fedra, MAAF, OVE, UGAP	Less than 50,000
Club Feroviar SRL	aARP, SNCF	Less than 50,000
CONCEPT & RESEARCH	CEJI, CGP, ECS	Less than 50,000
Consultoria de Innovación y Financiación S.L.	CASBEGA	Less than 50,000
COPRODES Comm.V	ECOLAB	Less than 50,000
CRISTINA VICINI	AISVEC, TIAW	Less than 50,000
CRUAÑAS & ASOCIADOS, CONSEJEROS, S.L.	AFCO	Less than 50,000
Dahan, Dahan-Bitton & Dahan	STW	Less than 50,000
Delany & Co	ISGA	Less than 50,000
Devant Limited	DB	Less than 50,000
DIERREPI CONSULTING di Dom Rosario Poidimani	iird	Less than 50,000
Digonnet & Kutas Consulting	BRF, CNA	Less than 50,000
Dr. Oliver Sude	EUCOPE	Less than 50,000
E-EUROCONSULTING SRL	isnea	Less than 50,000
Edelman Public Relations Worldwide	Fediol	100000 to 150000
EFS Strategy Consulting sprl	GLG	Less than 50,000
EMD Advisory Services	EASO	Less than 50,000
Emilie Martin Consulting	SNCF	Less than 50,000
EPPA SA	CEZ	Less than 50,000
EPPA SA	DEZA, SAFT	50000 to 100000
ESL & NETWORK EUROPEAN AFFAIRS SA	SES, ECPA, ENEL, EPIA, EUTELSAT, FFSA, LTC	Less than 50,000
ESL & NETWORK EUROPEAN AFFAIRS SA	ETI	100000 to 150000
Ethos Advisors	SGSS	Less than 50,000
EU Consult International	EFBA	Less than 50,000
EURALIA	AFTI, AGEA, ASF, CNEFAF, CNES, NFID, SNVEL, UEVP	Less than 50,000
Euro Keys	GIRP	350000 to 400000
Euro PA	FVDZ	Less than 50,000
Euro PA	ECS	50000 to 100000
Eurofishmarket snc	ARBI	Less than 50,000
Eurohub Consultancy Group	EAPA	Less than 50,000
Europe Analytica	CEPI, FIAD	50000 to 100000
European Intermediation	ENA, IMCA	Less than 50,000
Europtimum Conseil	CSOEC	50000 to 100000
Europtimum Conseil	LVMH, PMI	150000 to 200000

Name of lobby consultancy, law firm or consultant	Acronym	Turnover from client (€)
EUROSIDUS	AAATOF	Less than 50,000
EUROTRAN Conseil	ECG, EIM, ERFA, ESC	Less than 50,000
EuroVision and Associates	JETRO	Less than 50,000
EUTechStrategy	EMBL	Less than 50,000
EVOLO IDI S.L	NER	Less than 50,000
Exelcom Public Affairs	RTL	Less than 50,000
FairValue Corporate & Public Affairs	ANACOFI	50000 to 100000
FIPRA International Limited	MOL, PCC	Less than 50,000
FIPRA International Limited	RCCL	300000 to 350000
First in Brussels Ltd	HCC	Less than 50,000
Fleishman-Hillard	GERG, GIIGNL, ICA, NATS, NETS, NXP	Less than 50,000
Fleishman-Hillard	MEDEL	50000 to 100000
Fleishman-Hillard	ICAP	200000 to 250000
Fratini&Associati	ETNO, GSMA	Less than 50,000
FTI Consulting Belgium	UCB	Less than 50,000
FTI Consulting Belgium	FIA	50000 to 100000
Furrer.Hugi&Partner AG	SIBA, VSKB	Less than 50,000
Furrer.Hugi&Partner AG	VSV	50000 to 100000
G Plus Ltd	CNPMEM	50000 to 100000
G9SA TELECOMUNICACOES SA	PT	1250000 to 1500000
Genna Cabinet Sprl	AIIP	Less than 50,000
Gibbels Public Affairs	ESBA	50000 to 100000
Grayling	Amca, DSM, JRAIA, SNE	Less than 50,000
Hanover Communications International	BMS, MSD	Less than 50,000
Hans Erik Lindebo	EDF	50000 to 100000
Harwood Levitt Consulting	ACE, EFC	Less than 50,000
Havas Public Affairs Brussels	EAMSP, UTC	Less than 50,000
HCM Christoph Salmhofer	GRT	Less than 50,000
HCS sprl	EFPIA	Less than 50,000
Hering Schuppener Consulting Corporate Affairs & Public Strategies GmbH	EWE, ista, KKR	Less than 50,000
Hubert Consulting	CNOSF, EMA	Less than 50,000
Hume Brophy	KCG	50000 to 100000
IBEXPERTS Ltd.	IBEX	Less than 50,000
ICODA BVBA	IPMA	Less than 50,000
Image Sept Bruxelles	UGC	Less than 50,000
Incite Public Affairs	IDF	Less than 50,000
Incite Public Affairs	GSMA	50000 to 100000
Inrete Srl	COPROB	Less than 50,000
Insight Consulting	Aicig, CIGC, CNAOL, CNIEL	Less than 50,000
INSOLATIO PAMASOL, S.L.	PPG	50000 to 100000
Instinctif Partners (Brussels)	AWCS, BSA, EPBA, WOCCU	Less than 50,000
Instinctif Partners (Brussels)	GLI, GSMA, RGA	50000 to 100000
Interel European Affairs	CEPI, FFPI, GNT, ISPO, UPS, WBCSD	Less than 50,000
Interel European Affairs	IEEE	50000 to 100000
Interel European Affairs	MWV	100000 to 150000
InterRecherche S.P.R.L.	BDIU, EVME, FENCA	Less than 50,000
ISA - Intelligence & Science Applications	CEA	Less than 50,000
ISC Intelligence in Science	ACP, ONRG, UCD	Less than 50,000
ISC Intelligence in Science	EPO	50000 to 100000
Istituto Europeo Servizi	AON	Less than 50,000
Jim Murray	EUFFI	Less than 50,000
Jorge Louro, Ricardo Pena - Contabilidade e Consultoria, Lda	ACCVL	Less than 50,000
JS Strategic Advisory Services	ceumc	Less than 50,000
katalin kolosy	AEIDL	50000 to 100000
KEA European Affairs	BFI	Less than 50,000
KEA European Affairs	EGEDA	50000 to 100000
KK-Consulting	RAY	50000 to 100000
Knowledge Works srl	ETSI, AVSI	Less than 50,000
Kreab Gavin Anderson	FAM, ICI, LKAB, UBS, WMBA	50000 to 100000
Kreab Gavin Anderson	EDF	150000 to 200000
KW Communications	GBGA, ISGA	Less than 50,000
L'Europe à la Une	EDF	Less than 50,000

Name of lobby consultancy, law firm or consultant	Acronym	Turnover from client (€)
Landmark Public Policy Advisers Europe Ltd	CIUS	Less than 50,000
Landmark Public Policy Advisers Europe Ltd	WFA	50000 to 100000
Landmarks	AEGPL	Less than 50,000
Landmarks	CEPI	50000 to 100000
Landmarks	Cefic	100000 to 150000
Landward Research Ltd	EACEA, TBR	Less than 50,000
Laroche Conseil	IFRA	100000 to 150000
LAWIN	OOO	Less than 50,000
Lieve Lowet	FNMF	Less than 50,000
LOGOS Public Affairs	EGBA, FIM, IMEC	Less than 50,000
LOGOS Public Affairs	CEMEX	100000 to 150000
LOGOS Public Affairs	ATVEA, EFOA	150000 to 200000
Luc Domergue Consultants	VEES	Less than 50,000
Luc Domergue Consultants	CNCC	50000 to 100000
Lucidine Conseil	BNP, CACIB, HSB, RBC, UBS	Less than 50,000
Lucidine Conseil	CACEIS	50000 to 100000
Luther Pendragon Brussels	ATOC, NATS	Less than 50,000
Luther Pendragon Brussels	CLIA, UKMPG	50000 to 100000
Lysios Public Affairs	SFR	Less than 50,000
Lysios Public Affairs	Eutelsat	50000 to 100000
Malte Becker	EPTA	Less than 50,000
Manaar FZE (Dubai branch)	AEST	Less than 50,000
Marking Public Affairs bvba	AARP, APCO, ECHAMP, EUGMS	Less than 50,000
ceC Government Relations (CZ)	PMI	100000 to 150000
MHP Communications	EDRA, RSA	150000 to 200000
MISSAGLIAEASSOCIATI	CCOMEDIT	Less than 50,000
MSB Consulting	IABG	Less than 50,000
MSLGROUP Brussels	WGC	200000 to 250000
MWW	ATMIA	50000 to 100000
N-square Consulting	CCIA	Less than 50,000
NETWORKING The Matching Game	AEIDL	Less than 50,000
NGO COHEN AMIR-ASLANI & Associés - Cabinet d'avocats	SO	Less than 50,000
NIVIERE SUBVENTIONS & CONSULTING	AFT	Less than 50,000
Odesseana Consulting	IAGC	Less than 50,000
Open Gate Italia	ANICA	Less than 50,000
Open Road	IMA	Less than 50,000
pantarhei advisors europe	COSTEFF	Less than 50,000
pantarhei advisors europe	AMSC, EVN	50000 to 100000
PARCOURIR L'EUROPE	ARC LATIN	Less than 50,000
Political Intelligence	EAFM	Less than 50,000
QUALITIVIDADE - CONSULTORIA LDA	CRIO	Less than 50,000
Ricard Parés Casanova	PORCAT	50000 to 100000
Ricardo Baretzky	ECIPS	Less than 50,000
Ridens	NRC	50000 to 100000
Ridens	NGK	400000 to 450000
Rohde Public Policy	EAMBES, IBA, IPOPI, VPH	Less than 50,000
Rohde Public Policy	ESMO	50000 to 100000
Rohde Public Policy	PPTA	100000 to 150000
Rohde Public Policy	BD	200000 to 250000
Russchen Consultants	KPN	Less than 50,000
Schuman Associates	ATOS, BATS, BDO, ESBI, DTI, IAA, NIS, SAP, SES	Less than 50,000
SEANCE PUBLIQUE	CEA, IRSN	Less than 50,000
self-employed Economic Consultant	PAI	Less than 50,000
Sergey Teleshev	JCCO	Less than 50,000
SERVICIOS AVANZADOS DE CANARIAS	CECAPYME	Less than 50,000
Sharpe Lankester & Associates	SLB	Less than 50,000
Siempre	SIAC	Less than 50,000
Simply Europe	ABP, BAT, VAD	Less than 50,000
Smart Business Diplomacy	DTEK	100000 to 150000
SOCIETA' EUROPEA per lo SVILUPPO e l'INNOVAZIONE	AISCAT	50000 to 100000
Sophie Delair	ECRC	Less than 50,000
Sovereign Strategy	MMV	Less than 50,000

Name of lobby consultancy, law firm or consultant	Acronym	Turnover from client (€)
Sovereign Strategy	TMT	50000 to 100000
Strategis Communications sprl	EGBA	50000 to 100000
Stratton Park Associates	PCIA	Less than 50,000
Strauss&Partners	TNO	Less than 50,000
SVM Consult	SIINDA	Less than 50,000
Symbios Funding & Consulting GmbH	HPA	Less than 50,000
TELAGE	CE, EETT	Less than 50,000
TELAGE	FTTH	50000 to 100000
The Brussels Office s.a. / Brusselkontoret AS	ECOHZ	Less than 50,000
The Fullilove Consulting Group	ACORD, CNA	Less than 50,000
Top Strategies	AST, EADS	50000 to 100000
Törkel Consulting	AGES, DNVGL	Less than 50,000
VALMERE	CCIP, IPEMED, SNCF	Less than 50,000
Vlassembrouck Consult	PPTA	Less than 50,000
Vlassembrouck Consult	AMDR	50000 to 100000
Wageningen International Experts	IFDC	Less than 50,000
Weber Shandwick	ECSPA, Jetro	Less than 50,000
Weber Shandwick	EAACA	50000 to 100000
WELCOMEUROPE	E/D/F	50000 to 100000
WIISE	AIIPA	Less than 50,000
World Organisation of Public Procurement Agencies and Associations	GGI	Less than 50,000
YM CONSEIL	IFREMER	Less than 50,000
Zaparazzi	BRG, SEAP	Less than 50,000