



Alliance for Lobbying Transparency and Ethics Regulation
Rue d'Edimbourg 26
1050 Brussels

Brussels, 27th November 2020

Thierry Breton
Commissioner for the Internal Market

Dear Commissioner Breton,

Privileged and unbalanced access by Big Tech lobby

I am writing to you on behalf of ALTER-EU, the Alliance for Lobbying Transparency and Ethics Regulation. Our founding statement in 2005 was signed by over 200 civil society groups and ALTER-EU has ever since worked hard to improve regulation of lobbying.

We would like to express our concerns about the lobbying by big tech companies regarding the upcoming proposals for digital platforms, including the Digital Services Act, the Digital Markets Act and the New Competition Tool.

Research by ALTER-EU has shown that corporate interests have significantly more access to policymakers than other any other voices in the EU. We see this trend also in the context of the upcoming new rules for tech companies and it is mirrored in the summit with Big Tech on the DSA on the 2nd December where tech companies only are invited. This privileged and unbalanced access to the policy-making cycle is taking place despite the Commission's defence of the "principles of transparency, integrity and equality of treatment" in lobbying activities and understanding that "achieving balance and representativeness in the stakeholders [it] interact with means ensuring that all societal voices concerned are heard when debating, formulating or implementing EU policy, as Secretary-General Tatjana Verrier informed us last April.

Our own research and the recent leak of the Google lobby strategy by the newspaper LePoint suggest that Big Tech systematically tries to undermine the new rules for digital platforms in an aggressive and non-transparent way. Part of that strategy is to fund third parties to echo their message in Brussels, national capitals and the US. [Our research](#) also shows a network of think-tanks very active in tech regulation discussions, hosting debates, writing policy papers, participating in consultations, even directly lobbying EU policymakers, without ever disclosing that they are funded by companies like Facebook, Google, Microsoft, Apple and Amazon.

One concrete example of a think-tank that refuses to disclose its Big Tech relationships is the Center for Data Innovation (CDI) which refuses to disclose which companies fund them, even though we know that Google and Facebook are among them. That is why we were very concerned when we saw that Executive Vice-President Vestager [was planning](#) to attend the European AI Policy Conference on the 1st December 2020.

We note that the current EU rules for lobby transparency do not oblige organisations like think-tanks to disclose their funding sources. This remains a loophole for the EU Transparency Register to deliver on its objective of allowing citizens, journalists and policymakers understand who is lobbying who, on whose behalf and with

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

Email: coordinator@alter-eu.org - www.alter-eu.org

EUTR registration number: 2694372574-63

what budgets. We think that the case of Big Tech lobbying highlights why it is important that the Commission uses the ongoing negotiations to reform the Transparency Register to close this loophole and require think-tanks disclose their and funding too.

We therefore ask you:

(1) to send out a clear message against non-transparent lobbying by not attending meetings or events of think-tanks or other lobby actors that do not disclose their connections (e.g. via funding or membership) to big tech companies;

(2) to ask big tech companies publicly to disclose their lobby networks (including their funding to third parties) like they do in the United States, so that everybody, including policymakers themselves, know who tries to influence them at EU and member state level.

(3) in the context of the Inter-Institutional negotiations to reform the Transparency Register, close the think-tank loophole by demanding that think-tanks disclose funding sources.

(4) to make sure you enforce the guideline for commissioners to balance the numbers of stakeholder meetings with corporate interest representatives and non-profit entities (including NGOs, trade unions, academic institutions, etc) in the development of new rules on digital services and digital markets. These are fundamental questions that are not only of concern to companies, their interest groups and affiliated think-tanks. Therefore, organisations representing engaged citizens, consumers or workers should be included in meetings and discussions of the upcoming rules.

Thank you very much for considering our proposals. Should you have any question, please don't hesitate to come back to us.

Yours sincerely,



Nina Katzemich

on behalf of the steering committee of the Alliance for Lobbying Transparency and Ethics Regulation
(ALTER-EU)

ALTER-EU steering committee:

Paul de Clerck	(Friends of the Earth Europe)
Olivier Hoedeman	(Corporate Europe Observatory)
Nina Katzemich	(LobbyControl)
Jorgo Riss	(Greenpeace European Unit)

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

Email: coordinator@alter-eu.org - www.alter-eu.org

EUTR registration number: 2694372574-63