

Dodgy data

Time to fix the EU's Transparency Register

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

June 2012



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The **Alliance for Lobbying Transparency and Ethics Regulation** (ALTER-EU) is a coalition of about 200 civil society groups, trade unions, academics and public affairs firms concerned with the increasing influence exerted by corporate lobbyists on the political agenda in Europe, undermining democratic decision making in the EU and resulting in urgently needed progress on social, environmental and consumer-protection reforms being delayed, watered down or even blocked.

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Executive summary

One year after the introduction of the European Union's Transparency Register, analysis by the Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU) suggests that although the number of lobbies now registered has increased, far too many active EU lobby players are still not on the list.

As long as many major lobby players are missing, claims that the register is 'de facto mandatory' are misleading.

Overall the quality of the entries in the register is questionable, with a number of significant blind-spots in relation to the lobbying activities of major corporations, consultancies, law firms and trade associations.

- ▶ Many of those who are the biggest spenders on EU lobbying according to the register, are in fact very minor players or may not even be lobbying at all
- ▶ There appears to be widespread under-reporting by many large lobbying entities
- ▶ Law firms continue to evade disclosure
- ▶ Many registrants have taken a very lax approach to the accuracy, quantity and quality of their declarations

The Transparency Register is clearly not properly audited or monitored. This undermines its credibility, and raises questions about the register's contribution to increased transparency and accountability.

Indeed, the Transparency Register risks falling into disrepute if the Commission and Parliament allow it to continue in its current form. After four years of experimenting with a voluntary approach, the conclusion is inescapable: if the Commission and Parliament are committed to lobbying transparency, mandatory lobbying disclosure is unavoidable

Introduction

A year ago the European Commission and the European Parliament launched a joint lobby transparency register, called the Transparency Register (to avoid using the controversial term, 'lobbying'). The new register built on the **Register of Interest Representatives** which the Commission had set up in June 2008, as an outcome of the European Transparency Initiative.

The joint register was the result of lengthy negotiations between the Commission and MEPs. While a majority in the Parliament favoured a mandatory system with comprehensive disclosure, the Commission was unwilling to go much beyond the terms of its existing register. The outcome was a compromise that maintained the voluntary approach with a few new elements.

Under the new Transparency Register, registration became a condition for receiving a long-term access pass to the European Parliament. According to EU Commissioner Maroš Šefčovič this meant that although the joint register was voluntary "in a legal sense", it was 'de facto mandatory' because the access passes were much in demand among Brussels lobbyists.

The new register was celebrated by Commissioner Šefčovič as "good news for the transparency of policy-making in Europe. All organisations, whether trade and professional associations, NGOs, think tanks or others who have nothing to hide will be in the register and will provide the public and the institutions with information about their work. All those who are not in the register will have to be asked why they can't be transparent – and they will see their daily work made more difficult by not being registered, in particular through the requirements of the European Parliament"¹.

He also explained in June last year that the register would cover "everybody who wants to participate in the policy debate in the EU"². Particular priorities were law firms and think tanks which had so far refused to join the voluntary register³.

Lobbies were to "provide more information than before, such as the number of staff involved in advocacy, the main legislative proposals they have covered, as well as the amount of EU funding they received"⁴.

In response to criticism about the reliability of the information in the register, including lobbies under-reporting their lobby expenditure, the register secretariat would undertake random checks and a new complaints mechanism would be introduced. "We are very serious about verifying all financial disclosures. This is very important for the credibility of the register," Commissioner Šefčovič announced. A few months later he stated that "quality checks are now regularly operated with a view to identify, and limit, possible mistakes appearing in the Register"⁵.

This report assesses the Transparency Register after its first year in operation. Is it 'de facto mandatory', i.e. have virtually all Brussels-based lobbyists registered? Have law firms and think tanks signed up? Does the register provide substantial new information on the number of lobbyists and issues lobbied on? Have quality checks and the new complaints mechanism reduced levels of under-reporting and the wider problem of the register containing unreliable information? These are key questions for the future of EU lobby transparency.

¹ Commission and European Parliament launch Joint Transparency Register to shed light on all those seeking to influence European policy, European Commission press release, 23 June 2011.

² Interview with Commissioner Šefčovič, Open for business, Parliament Magazine, 28 June 2011.

³ Šefčovič, The change in lobbying after the Lisbon Treaty, speech at a conference organised by the British Chamber of Commerce in Brussels, 22 November 2011.

⁴ Commission and European Parliament launch Joint Transparency Register to shed light on all those seeking to influence European policy, European Commission press release, 23 June 2011.

⁵ Šefčovič speech, November 22 2011 (see footnote 3)

1. Is the EU's lobby transparency register 'de facto mandatory'?

"All organisations, whether trade and professional associations, NGOs, think tanks or others who have nothing to hide will be in the register and will provide the public and the institutions with information about their work." While the new register is voluntary "in a legal sense", it is "de facto mandatory"
– Commissioner Šefčovič

One year after the launch of the joint Transparency Register, the number of registered organisations and firms has increased⁶. Yet ALTER-EU research⁷ shows that hundreds of relevant lobby players are still missing from the register⁸.

The higher levels of registration can be partly attributed to the fact that registration is now a requirement for receiving European Parliament access passes. However, a crucial category, law firms that lobby, remains largely absent.

1.1. Companies

Among the non-registrants we found the following banks from the FT 500: Banco Santander, BBVA Group, Belfius (Dexia), la Caixa, Deutsche Bank, Erste Group Bank, Goldman Sachs, HSBC, Nomura, Nordea, Rabobank, Royal Bank of Scotland, Swedbank and UBS. In total we identified some 120 companies that have EU lobby operations, but that are not in the register. This list includes Apple Inc, Disney, Time Warner, Rio Tinto, Monsanto and three big retailers: Metro AG, Koninklijke Ahold and Rewe.

For a full list of the companies identified as missing from the Transparency Register, see Appendix 1. It should be noted that this list is not comprehensive and that there are in all likelihood more than 120 companies lobbying but not on the register.

1.2. Lobby consultancies

Four years after the launch of the Commission's Register of Interest Representatives, and one year after the launch of the joint Parliament-Commission Transparency Register, most of the larger Brussels-based lobby consultancies are now registered. But we still found some 70 small and medium-sized lobby firms, most of them Brussels-based, which are not on the Transparency Register, despite being active EU lobby players, including Aspect Consulting (nominated for the 2008 Worst EU Lobbying Awards⁹), UK lobby firm Bell Pottinger¹⁰, Ketchum Pleon Belgium¹¹ and MacBrien Cuper Isnard¹².

For a full list of the unregistered lobby firms identified, see Appendix 2.

⁶ There are now more than 5,000 entries in the register.

⁷ ALTER-EU's research was carried out in early June 2012. All data in this report that come from the Transparency Register refer to entries as they were before 12 June 2012. The actual information on the Transparency Register (which can be updated anytime) may have changed since.

⁸ To assess how many relevant EU lobby players are still missing from the register, we used external directories of lobby firms and corporate EU affairs offices and lists of participants in EU stakeholder consultations and established which of the companies on those lists are not in the Transparency Register. As the directories used are not necessarily comprehensive, it is likely that there are other companies which lobby in Brussels but which are not on the transparency register.

⁹ Philippa Runner, NGOs put forward EU 'worst lobbying' candidates, EUobserver, 20 October 2008.

¹⁰ Patrick Wintour, Bell Pottinger faces claims it offered rogue regimes access to politicians, The Guardian, 6 December 2011. Info on Brussels office: <http://www.bppa.co.uk/whatwedo/europe/> (accessed 12 June 2012).

¹¹ http://www.ketchum.com/be/?q=en/about_us (accessed 12 June 2012).

¹² http://www.macbriencuperisnard.com/uk/index_set_uk.html (accessed 12 June 2012).

1.3. Law firms

Most of the law firms in Brussels that provide lobbying services appear to be continuing their de facto boycott of the register, either by not registering, or by not disclosing who they lobby for.

Among the law firms which have not registered are large Brussels-based law firms such as Covington & Burling¹³, DLA Piper¹⁴, Field Fisher Waterhouse¹⁵, Freshfields Bruckhaus Deringer¹⁶, Mayer Brown¹⁷ and WilmerHale¹⁸. Firms like Linklaters, Reed Smith LLP and White & Case have registered, but – in violation of the requirements for registering – have not disclosed information on their lobby clients.

This contrasts with the situation among lobby consultancies where all large Brussels-based consultancies have now signed up to the register, and it seems likely that only a mandatory register will force the law firms to comply.

One of the reasons that the US moved from a voluntary to a mandatory lobby disclosure system in the mid-1990s was that law firms stubbornly refused to disclose their lobby activities. The unacceptably low level of participation in the EU's voluntary Transparency Register should give the European Commission and the European Parliament every reason to follow the US example and put in place mandatory lobbying disclosure rules. [See **ALTER-EU report – Commission Register Fails Transparency Test**, June 2009]

1.4. Think tanks

Most of the larger think tanks are on the register now, although some major ones, such as the European Centre for International Political Economy (ECIPE), the European Council on Foreign Relations (ECFR) and the Security and Defence Agenda are still not registered. But even with most think tanks now in the register, actual transparency is still minimal, because the disclosure requirements for think tanks are very limited. Think tanks do not have to disclose their funding sources, only whether their funding is public or private.

1.5. Is the register 'de facto mandatory'?

With so many major companies, lobby groups, consultancies and law firms active in EU lobbying remaining outside the Transparency Register, it is obviously not 'de facto mandatory'. The Parliament's access passes are an attractive incentive, but clearly not sufficient to secure lobbying transparency.

The voluntary nature of the register means that those who wish to avoid disclosure can very easily do so. Lobbies also have the option of temporarily de-registering and re-registering if they want to keep certain activities, clients or expenses undeclared. This is another reason why a mandatory register is needed.

SOLUTION:

The measures the European Commission and the European Parliament have put in place to induce compliance have clearly failed to promote disclosure by all the key lobbies in Brussels. After four years of experimenting with voluntary lobbying transparency the conclusion can only be that the EU needs to move towards mandatory registration and disclosure in order to ensure that all major lobbying actors are indeed on the lobbying transparency register.

As putting in place mandatory EU lobbying disclosure will take time, the Commission and Parliament must introduce far tougher pressure in the short-term to force lobbyists to register.

¹³ <http://www.cov.com/brussels/> (accessed 12 June 2012).

¹⁴ <http://www.dlapiper.com/belgium/services/> (accessed 12 June 2012).

¹⁵ <http://www.ffw.com/offices/brussels/competition---eu-regulatory.aspx> (accessed 12 June 2012).

¹⁶ http://www.freshfields.com/en/global/what_we_do/our_services/EU_regulatory_and_public_affairs/ (accessed 12 June 2012).

¹⁷ <http://www.mayerbrown.com/locations/Brussels/> (accessed 12 June 2012).

¹⁸ http://www.wilmerhale.com/eu_regulatory/ (accessed 12 June 2012).

Lobbies missing in action

Recent reports on EU lobbying by different industry sectors found that a large number of major companies and lobby groups are not listed in the register. Some of these may have registered since the publication of these reports:

- ▶ **Nuclear energy:** large players like the European Nuclear Society, TVO, CEZ, Paladin and Toshiba are not in the register¹⁹.
- ▶ **Financial sector:** big banks including HSBC and Deutsche Bank, as well as big financial lobbies such as the Futures and Options Association (FOA), the Managed Funds Association (MFA) and the Alternative Investment Management Association (AIMA)²⁰.
- ▶ **Pharma:** at least 10 drug companies are missing from the register, including Abbott Laboratories, Astellas, Boehringer Ingelheim and others that hire lobby consultancies to vie for their interests in the EU and that respond to public health consultations hosted by the European Commission²¹.
- ▶ **Agribusiness:** big companies such as Mars, Monsanto, Heinz and Pepsi are not in the register²².
- ▶ **ACTA:** 60 per cent of the members of the industry lobby coalition defending the controversial Anti-Counterfeiting Trade Agreement (ACTA) are missing from the Transparency Register (45 out of 75)²³.

¹⁹ Corporate Europe Observatory, Nuclear contamination – a year after Fukushima, why does Brussels still back nuclear power?, March 2012.

²⁰ Report on financial sector lobbying against the proposed Financial Transactions Tax, Oxfam Great Britain, forthcoming.

²¹ Corporate Europe Observatory and Health Action International Europe, Divide & Conquer: A look behind the scenes of the EU pharmaceutical industry lobby, March 2012.

²² Corporate Europe Observatory, Agribusiness interests vs. Family Farms, Workers, Consumers, Local and Environmental Interests in the EU: Towards a ratio in lobbying expenditures, June 2012. <http://www.corporateeurope.org/>

²³ Corporate Europe Observatory, Pro-ACTA lobbies fail on transparency, Brussels Sunshine, 21/02/2012.

2. Does the new register provide more information than before?

In the new register registrants are to “provide more information than before, such as the number of staff involved in advocacy, the main legislative proposals they have covered, as well as the amount of EU funding they received”.
– European Commission press release 23 June 2011²⁴

2.1. Do we know more now about who is lobbying?

Under the provisions of the Transparency Register, organisations requesting access passes to the European Parliament are required to join the register. The names of individual lobbyists holding badges are displayed in the register. But the names of lobbyists without an access badge remain unknown.

Paradoxically, there is currently less transparency around the names of lobbyists than before the new register was launched. In May 2011 there were 4,051 accreditations to the European Parliament²⁵, meaning that the names of 4,051 lobbyists were visible. Now this figure has dropped to 2,625 (May 2012), a reduction of 35 per cent.

SOLUTION:

ALTER-EU recommends that registered organisations should be asked **to list the names of all their lobbyists, not only of those who have an access pass to the European Parliament.**

2.2. Do we know more about what issues the EU institutions are lobbied on?

When the register was launched it was announced that registrants would have to give information on the legislative proposals they had lobbied on. In the declaration forms there is a field called “Activities”, explained as “Main EU initiatives covered the year before by activities falling under the scope of the Transparency Register”. In practice, a large share of registrants provide very **general, vague and largely meaningless declarations on their lobbying activities.**

The declaration of the Association for Financial Markets in Europe (AFME), one of largest financial sector lobby groups, might for example be expected to include issues such as the Markets in Financial Instruments Directive (MiFid) or the proposed financial transaction tax. Instead, AFME’s declaration is limited to a couple of sentences about the interests it represents and its areas of expertise. The entry does not clarify which EU initiatives the group has lobbied on²⁶.

Another example is European Atomic Forum’s (Foratom) declaration. Instead of providing a list of EU legislative dossiers lobbied on, Foratom simply declares: “Nuclear energy”. The employers’ lobby group, BusinessEurope, provides the equally uninformative: “All topics that matter to European companies”.

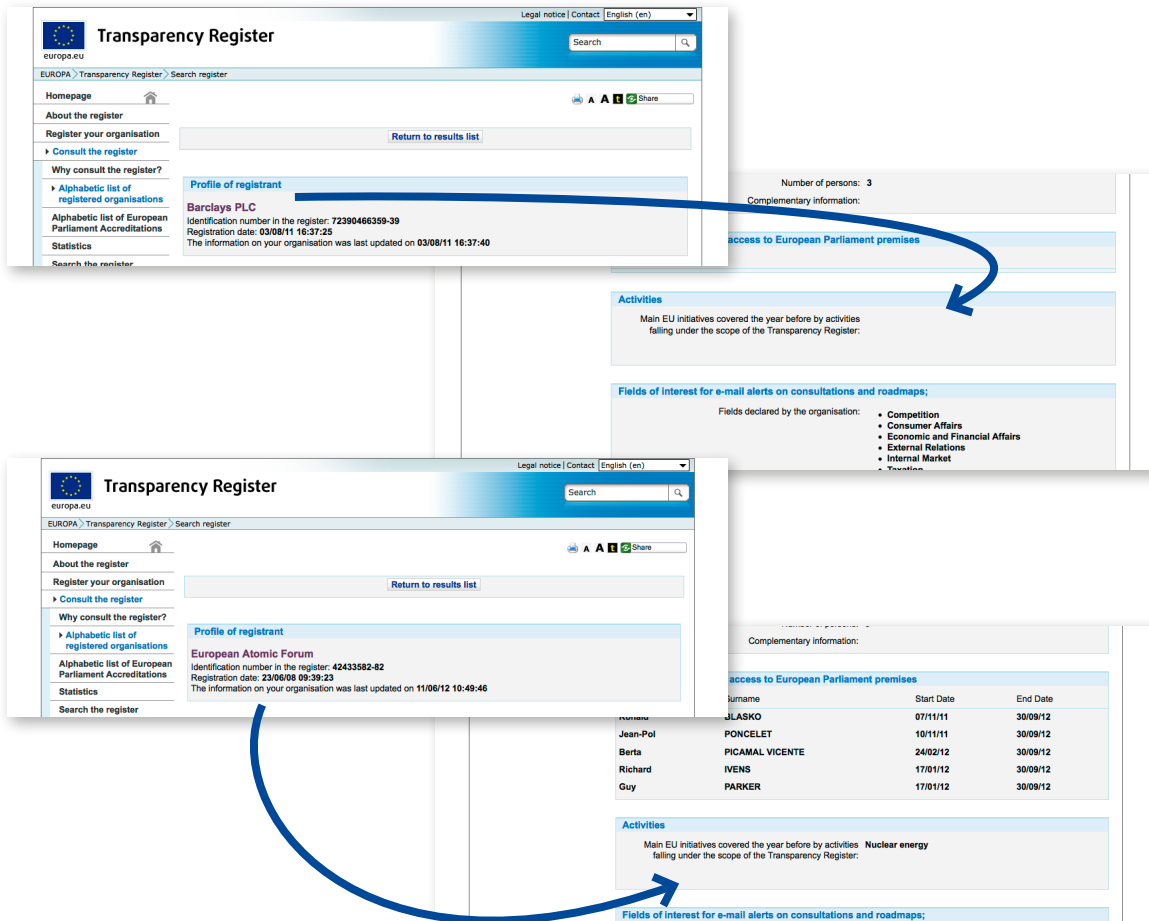
Many lobby consultancies are similarly vague about their actual lobbying. GPlus declares: “We advise clients on a very broad range of EU initiatives”, while APCO states that it “advises clients on developments with the institutions of the European Union across a wide spectrum of issues and policy areas”.

²⁴ Commission and European Parliament launch Joint Transparency Register to shed light on all those seeking to influence European policy, European Commission press release, June 23 2011.

²⁵ Maja Kluger Rasmussen, Lobbying the European Parliament: A necessary evil, CEPS Policy Brief, No. 242, May 2011.

²⁶ What it says is: “AFME represents participants in the wholesale financial markets and seeks, among other things, to act as a resource to policymakers and a communications channel for members in matters related to regulation of those markets. Our areas of expertise include supervisory architecture, capital, liquidity, securitisation, resolution, insolvency, primary markets, secondary markets, market infrastructure, taxation, and clearing and settlement”. <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=65110063986-76> (accessed 12 June 2012).

Some registrants, including Barclays and JKO Consulting, have simply **left this field blank**.



The new version of the register guidelines, updated earlier this year, states that registrants must provide clear information about issues lobbied on²⁷. Without proper disclosure the Transparency Register cannot make a meaningful contribution to lobbying transparency in Brussels.

SOLUTION:

ALTER-EU recommends that the register secretariat carries out **regular checks** on registrations to check whether lobbies have provided all the information required (including a list of main legislative proposals on which they have lobbied). Leaving the “Activities” field blank should not be allowed. Furthermore, consultancies and law firms should be obliged to provide **a list of the main legislative proposals on which they have been lobbying for each of their clients**.

²⁷ TR GUID OE 1/2011 (rev March 2012): Main legislative proposals covered by the activities of the registrant
Under this label, registrants should list the legislative files on which they have worked and carried out activities falling under the scope of the Register during the preceding year.
Failure to enter anything under this heading after the first year of registration may be considered as an anomaly and may lead the common secretariat to request a clarification from the registrant.
Transparency Register Compliance Guidelines. Edition N°2 - 27 April 2012.

3. Does the register provide a reliable picture of lobbying in Brussels?

“We are very serious about verifying all financial disclosures. This is very important for the credibility of the register”

– Commissioner Šefčovič

3.1. The biggest spenders

According to the data in the register, these are the 10 companies which spend the most on EU lobbying²⁸.

Panavision Europe Ltd	35 000 000
Ericsson	8 875 000
Accenture International SARL	8 375 000
Schneider Electric	5 875 000
DEKRA e.V.	5 125 000
ExxonMobil Petroleum & Chemical	4 875 000
Microsoft Corporation	4 625 000
Siemens AG	3 888 241
Shell Companies	3 875 000
GDF Suez	3 875 000

There are several elements that suggest **this is not a reliable picture of the top lobby spenders**.

To begin with, the American camera equipment producer Panavision is unlikely to be the biggest spender on lobbying among companies in Europe and is even less likely to spend 35 million euro per year on EU lobbying. One clear indication that Panavision is not a major player is that it does not have a Brussels office or any affiliation with Brussels-based lobby consultancies or think tanks. In the US, the company reported spending 10,000 US\$ on lobbying in 2009, 10,000 US\$ in 2010 and nothing in 2011²⁹.

Panavision’s declaration of 35 million euro lobbying expenditure is almost certainly a mistake or a misunderstanding.

The figures given for Dekra and Schneider Electric are more plausible as both have Brussels offices with full-time lobbyists, but it would be surprising if they indeed spent more on EU lobbying than far larger and more politically active companies such as Siemens and Shell.

The problem of unreliable registrations is even more striking when looking at the top 10 spenders among consultancies and law firms.

Mr Georgios Stilianou	100 000 000
Gowex	50 000 000
Ayudantía Gip S Coop	18 000 000
Mainstream Renewable Power Limited	11 593 000
Fleishman-Hillard	9 915 957
Burson-Marsteller	8 755 000
Landmark Public Policy Advisers Europe Limited	7 625 000
Green Business Uk Limited	5 875 000
Med Ingegneria S.r.l.	5 875 000
Social Finance Limited	5 125 000

²⁸ The figures provided for financial disclosure either refer to the exact stated amount, or where declarations give a bandwidth, to an average of the two figures is taken.

²⁹ Entry for Panavision on opensecrets.org (accessed on 12 June 2012).

It appears that seven of the companies in the top 10 have made erroneous financial declarations. These seven do not even seem to have offices in Brussels and are most likely very minor lobbying players, who have misunderstood the disclosure requirements. It is even possible that they do not lobby at all.

According to the Transparency Register, Georgios Stilianou, a self-employed consultant with just one client, is the largest player in EU lobbying. Stilianou reports 100 million euro EU lobbying turnover in 2011 and employing 72 lobbyists.

GOWEX, the second largest player among EU lobby consultancies according to the Transparency Register, is a telecommunications company that reports having a Spanish municipality as its only client, while declaring 90 lobbyists and 50 million euro turnover in 2010 related to lobbying EU institutions.

These figures show that the register secretariat is not even pro-actively checking the largest entries in the register.

The screenshot displays the Transparency Register profile for Georgios Stilianou. Key details include:

- Profile of registrant:** GEORGIOS STILIANOU, Identification number: 11201297358-90, Registration date: 07/12/11 08:44:25.
- Goals / remit:** to provide job to unemployment persons in cyprus. Level of interests represented: European.
- Number of persons engaged:** 72.
- Financial data:** Financial year: 01/2011 - 12/2011. Share of turnover related to representing interests to EU institutions on behalf of clients: 100,000,000 €.
- Clients with turnover below 50000 €:** ALFA MEGA HIPER MARKE.

In November 2011, EU Commissioner Šefčovič stated that “quality checks are now regularly operated with a view to identify, and limit, possible mistakes appearing in the Register”. Given the above findings, have any quality checks been performed?

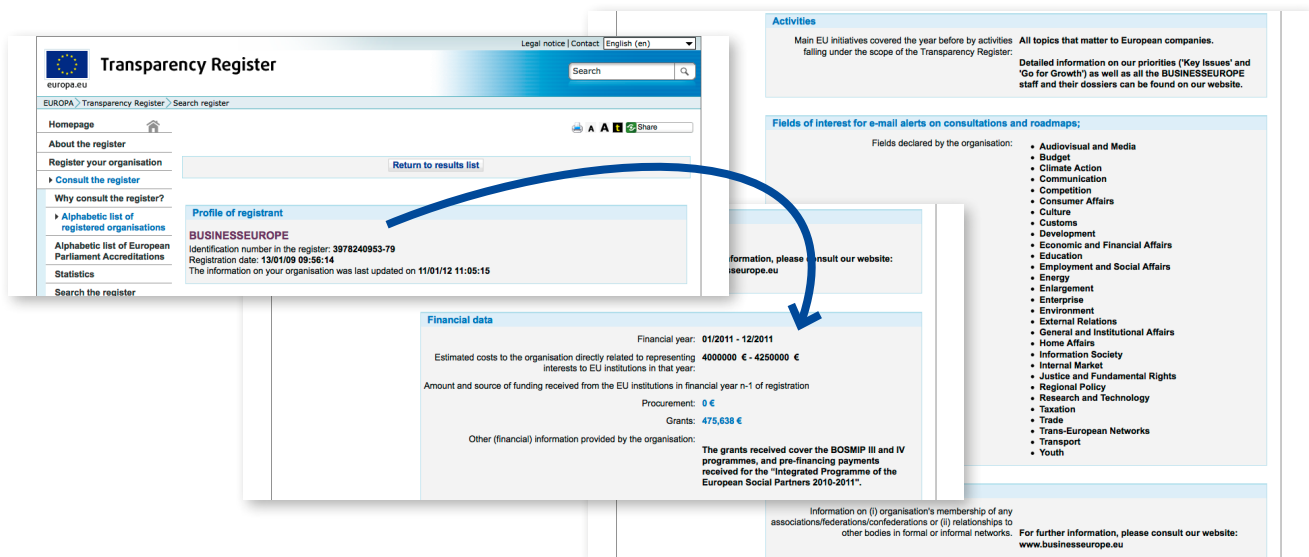
The 10 business associations with the highest EU lobby expenses:

European Seeds Association (ESA)	8 375 000
European Chemical Industry Council (CEPIC)	6 000 000
BusinessEurope	4 125 000
Association de l'Aviculture, de l'Industrie et du Commerce de Volailles dans les Pays de l'UE	3 875 000
Hauptverband der Deutschen Bauindustrie	3 625 000
Verband der chemischen Industrie e.V. (VCI)	3 500 000
Bundesverband der Deutschen Industrie e.V. (BDI)	3 100 000
European Union of the Natural Gas Industry (EUROGAS)	3 007 500
Federazione Nazionale dell'Industria Chimica italiana	2 875 000
Bundesverband der Energie- und Wasserwirtschaft e. V. (BDEW)	2 375 000

The list of the largest business lobby groups also raises questions over the reliability of financial information in the register. It seems unlikely that a sectoral lobby group (for the seeds industry) is really the biggest spender in this category. It is hard to imagine that this group spends twice as much on EU lobbying as BusinessEurope, which is one of the most well-resourced industry lobby groups, covering many sectors and virtually all EU countries.

SOLUTION:

The register's **auditing and enforcement system** must be improved to secure reliable information on lobbying in Brussels. Unless this data is checked and improved, the information in the register is of little use to MEPs, media or citizens who want to understand lobbying in Brussels and hold decision makers to account.



3.2. Lobby expenses: widespread under-reporting

While our top 10 rankings reveal that many registrants (probably mistakenly) report hugely inflated lobbying expenditure, there is also widespread under-reporting. ALTER-EU research shows that **many of the reported lobbying expenditures are unrealistically low**.

This becomes clear when looking at the declarations of very active European lobbies like the European Crop Protection Association (ECPA) or the financial lobby group European Fund and Assets Management Association (EFAMA). Both declare an annual lobbying budget of between 100,000 and 150,000 euros. This seems way too low, especially considering that staff cost must be included³⁰ and that the average costs of employing a corporate lobbyist in Brussels are 100 000 euro per year³¹. EFAMA and ECPA employ 10 and 14 lobbyists respectively in their Brussels offices, so the real lobbying expenditure could easily be 10 times higher than the amount declared in the register.

A recent study by Corporate Europe Observatory on agribusiness lobbying also found examples of under-reporting, for example in the entry of biotech lobby Europabio, which lists lobbying expenditure of only 50,000 euros and only two lobbyists, despite having an 18-strong office in Brussels³².

³⁰ TR GUID Fin 3/2011 (rev March 2012): Cost estimate

The "estimate of the cost of the activities falling under the scope of the Register" by the registrants should be established by adding together the following 5 elements:

1. Staff cost.
2. Administrative costs.
3. Outsourced activity costs, consulting fees and subcontracted activities.
4. In-house operational expenditures.
5. Full Membership fees, contributions and participation costs overall.

³¹ See as references:

Mark Dober, Are you paid what you deserve?, undated (accessed on 12 June 2012).
AALEP, What do Lobbyists do?, undated (accessed on 12 June 2012).

³² Corporate Europe Observatory, "Agribusiness interests vs. Family Farms, Workers, Consumers, Local and Environmental Interests in the EU: Towards a ratio in lobbying expenditures", June 2012. <http://www.corporateeurope.org/>

There are also a number of cases of what seems to be extreme under-reporting in the register, including more than **20 companies which declare lobbying expenses of less than three euros per year** (see Appendix 3). One example is Verdes (a Bulgarian fish farming company), which declares that it spent no more and no less than 1.96 euros on lobbying the EU between January 2010 and July 2011.

This problem is even more widespread among lobby consultancies. There are more than 50 consultancies, consultants and law firms in the register that **declare spending zero or one euro on lobbying** (see Appendix 3). These entries could be mistakes or could be from registrants who are not involved in lobbying and who should not be in the register at all.

With so many of these misleading entries, it is hard to take the financial disclosure of lobbying seriously, bringing the entire principle of lobbying disclosure into disrepute. Those responsible for maintaining the register must address this matter as an urgent priority.

There are also examples in the register of companies which fail to include their **outsourced lobby activity costs, such as consulting fees and subcontracted activities** in their lobbying expenses, as required by the guidelines. We have found several examples of this, including the Lloyds Banking Group, which declares spending between 100,000 and 150,000 euro, while the consultancy firm MHP Communications declares receiving between 150,000 and 200,000 euros for lobbying on Lloyds' behalf.³³

SOLUTION:

ALTER-EU stresses the need for **regular checks on entries and meaningful enforcement** to prevent under-reporting.

Last year, the Commission announced it would start carrying out such checks, including for registrants reporting zero or very low amounts. This appears not to be happening, or at least not in a regular or effective manner.

One simple measure against extreme cases of under-reporting would be to prevent companies, consultancies and law firms from registering if they report lobby expenses of amounts that are close to zero. If their lobby expenses are that low, there is no reason for them to register in the first place.

The register secretariat must become more active and give a clear signal that reliable information is expected from all registrants. One interim measure could be for access passes to the European Parliament to be withdrawn from registrants with dubious registrations.

The secretariat should also improve the complaints procedure, which – according to the experience of several complainants – is still far from being as effective as it should be in terms of discouraging under-reporting and other misleading registrations.

3.3. Incomplete clients lists

Consultancies and law firms are supposed to provide a full list of clients for whom they lobby and to disclose the amount spent on lobbying for each of these clients (within bandwidths).

In practice, **a lot of consultancies and law firms evade this requirement, leaving the clients field blank or giving redundant answers**, such as “private clients” (FDI Top Consult SRL) or their own name (for example, Luca Cortese).

The law firm White & Case LLP, a big player in lobbying, has entered the following statement in the field intended for disclosing clients lobbied for: “All client information is confidential and protected by bar rules and regulations”. This is a glaring violation of the Code of Conduct, which states that registrants shall specify the clients they represent, as well as ensuring that, to the best of their knowledge, information they provide upon registration is complete³⁴.

³³ Financial services company BlackRock declares spending between 100,000 and 150,000 euro on EU lobbying, while lobby consultancy Fleishman Hillard lists BlackRock among the clients generating a turnover of between 200,000 and 250,000 euros. If BlackRock is paying at least 200,000 to this consultancy to lobby for them, its own declaration is clearly not factual. Although Fleishman Hillard's declaration covers 12 months while BlackRock's declaration only covers 11 months, it seems inconceivable that 100,000 Euros could be spent in just one month, meaning that this inconsistency in their declarations is cause for concern.

³⁴ TR GUID OE 2/2012 (March 2012): Information about clients, required from registrants of section I
Registrants under section I must enter the turnover attributable to the activities falling under the scope of the Register, as well as the relative weight of their clients. This must be understood as the provision of the full list of all clients, designated by their individual names and their location within the bracket grid of values offered by the registration form.
Declarations entered without the full list of the individual clients or with an unidentifiable collective designation such as “corporates” “other small clients” “confidential information” or similar do not meet the requirements.

In the US, the legal system also has high standards of client confidentiality, and yet, law firms engaged in lobbying disclose the names of their clients and amounts paid for lobbying services³⁵.

In many other cases the clients list is clearly incomplete, as evidenced by the fact that the total spending reported by the consultancy and the sums for each client do not add up. For example, KEA European Affairs reports having only three clients, each with a turnover below 50,000 euros, yet it declares a total lobby expenditure of between 900,000 and 1,000,000 euros. This suggests they are not disclosing all their clients.

Many consultancies also use unintelligible **acronyms and abbreviations** when giving information about clients, which makes it hard to know who these clients are. The updated guidelines specify that acronyms and abbreviations are not satisfactory³⁶. The full names of the clients should be entered. A large number of registrants do not comply with this rule.

SOLUTION:

ALTER-EU suggests **regular checks on registrations and enforcement to prevent these problems**. For the review of the register in 2013, ALTER-EU believes that all consultancies and law firms should declare clients' expenditure in **bandwidths of €10,000**. Consultancies and law firms should be suspended from the register and their Parliamentary passes withdrawn if they fail to disclose clients.

3.4. Under-reporting the number of lobbyists

There is also the issue of under-reporting the number of lobbyists. This is evident from the fact that there are **organisations that report having fewer lobbyists than they have European Parliament access passes**. The Association of European Airlines, for example, claims to have 1.5 lobbyists, but has three lobbyists with Parliament access passes. BP has seven accredited lobbyists, but reports having just five lobbyists.

The guidelines state that any person benefiting from accreditation for access to the European Parliament should be counted as a full person.

SOLUTION:

The current transparency requirements are apparently not clear enough. To get a realistic picture of their lobbying capacities and activities, registered organisations should be asked to disclose the **total number of persons involved in lobbying**, including **their names**, as well as a **calculation of the equivalent in full-time persons**.

3.5. Outdated information

Registrants are required to update their declarations whenever there has been a significant change or at least once a year³⁷. But these updates do not necessarily result in recent information being added. We found no less than 62 entries where the **financial information was more than two years old**. In 44 of these cases the financial data related to 2009 and in 12 cases the data pertained to 2008. Considering that the register is intended to cast light on who is lobbying and with what budgets, it is unacceptable that the financial data submitted is so outdated. Clearly the register secretariat does not check or intervene to secure reasonably up-to-date financial information.

It is also unclear to what extent the client lists of lobby firms are up-to-date, so there may also be a lot of outdated information in this part of the register.

³⁵ See the entry for law firm Patton Boggs on opensecrets.org (accessed on 12 June 2012).

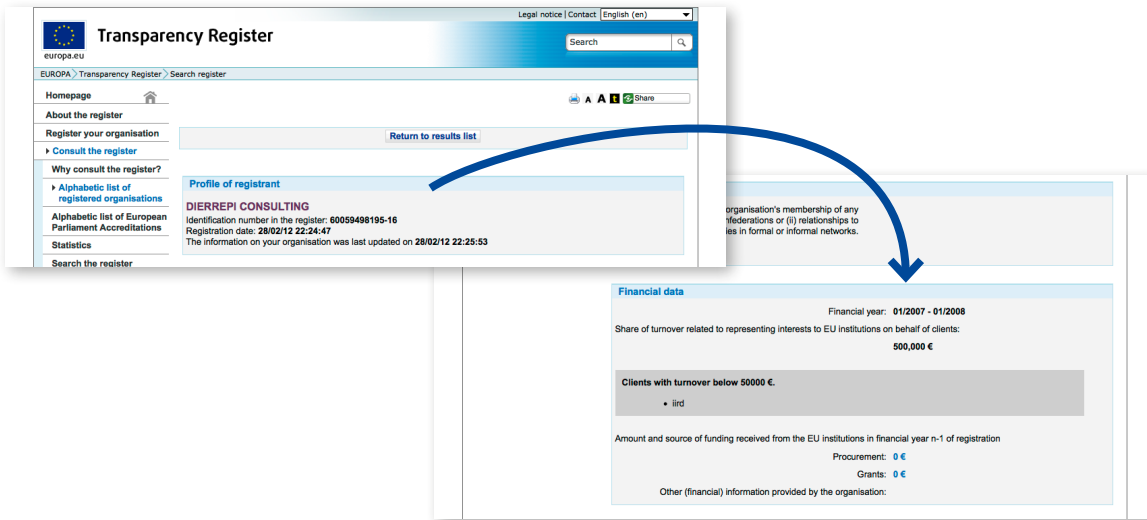
³⁶ TR GUID OE 3/2012 (March 2012): Acronyms and abbreviations

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.

³⁷ See question 15 in: Transparency Register Frequently Asked Questions (FAQ) , Version 1 – 23 June 2011.

SOLUTION:

ALTER-EU recommends the register secretariat actively **checks** register updates and ensures that the financial information is up-to-date. As a starting point, lobby expenses should refer to the most recent calendar year. For the 2013 review of the register we believe there should be a requirement for all registrations to be **updated twice a year, on fixed and known dates**, in order to improve transparency and compliance.



4. Conclusion

While the link with the European Parliament access passes has boosted the number of Brussels-based lobbies registered, the new register has so far not shown itself to be 'de facto mandatory'. Our research identified 120 companies actively lobbying in Brussels that were not registered. A large number of lobby groups and consultancies are also not in the register. Most law firms that engage in lobbying continue to boycott the register. Many of those that have submitted entries, have not been completely transparent about their lobbying. While a reasonable percentage of Brussels-based think tanks are registered, there is still little transparency about their funding sources.

Contrary to what was promised, the new register has failed to provide more information than before. On a central issue such as revealing the names of lobbyists, the new register is less informative than the previous one. The number of names has dropped dramatically (2,625 names compared to the 4,051 that were on the "List of lobbyists accredited to the European Parliament" in May 2011). Details about which legislation registrants are lobbying on are also missing, or unclear and largely useless.

Despite public assurances, the new register is also no more reliable than before. Our analysis of the biggest spenders reveals that the information about lobby expenditure in the register is seriously flawed. Seven out of 10 of the largest lobby consultancies (based on information in the register) would not be considered to be in the top tier of lobbying consultancies by most Brussels insiders. This means that the information in the register is quite misleading.

The serious problem of under-reporting lobby expenses is still an issue. This shows that the Commission is not effectively carrying out the checks that were promised. The financial information in the register is also often seriously outdated.

The promises made by Commissioner Šefčovič when the new register was launched a year ago have not yet been delivered on.

Bizarrely, the register now includes large numbers of registrants who do not appear to do any lobbying. ALTER-EU believes the register secretariat must act to ensure that the register includes all those that lobby the EU institutions, not those who do not engage in this. But as the Commission's indicator for success so far has been the total number of registrants (regardless of who they are), there may not be sufficient motivation for the Commission to actually solve this problem.

The Commission and Parliament must act with determination to fix these shortcomings. The register secretariat is to prepare an annual report (expected in September) and in 2013 there will be a fundamental review of the register. Commissioner Šefčovič last year indicated that this review would include "the possibility of making it mandatory if necessary".

Lobbyists influence decisions made in Brussels which affect hundreds of millions of people across Europe (and the rest of the world). Genuine transparency around the role of lobbyists should therefore be considered a democratic right. Transparency moreover allows for critical scrutiny that promotes a more informed debate about EU decision-making. And visibility can help to detect unethical lobbying and corruption.

When Commissioner Siim Kallas (then responsible for transparency issues) launched the debate about lobby transparency seven years ago, he stated that EU citizens had the right to know who was lobbying to influence EU decision-making, on whose behalf, on which issues, and with which budgets. Kallas was right: only a register that secures this level of visibility will make a real, positive difference. A register that tolerates dubious declarations, flawed entries and evasion does not contribute to transparency or understanding.

4.1. Recommendations

After four years of experimenting with voluntary lobbying transparency, the conclusion can only be that the EU needs to move towards mandatory registration and disclosure in order to ensure that all major lobbying actors disclose their lobbying activities. As long as registration is on a voluntary basis, a significant number of those involved in lobbying will choose not to register. Therefore, ALTER-EU urges the Commission and the Parliament to start preparations for a transition to mandatory register, which should happen at the latest by the end of this term, in 2014.

In the short term, the register secretariat must continue to put pressure on lobbies to join the register, for example by naming and shaming companies and organisations that stay out of the register, but who are known to lobby EU institutions. MEPs, EP staff and Commission staff should refuse to meet with companies and organisations that opt to stay out of the Transparency Register.

At present, the information in the register is very unreliable. ALTER-EU stresses the need for clear guidance on disclosure requirements, regular checks on registrations to prevent mistaken registrations and meaningful enforcement to prevent under-reporting. The current inadequate oversight by the register secretariat is unacceptable and should be replaced with more comprehensive and effective data checking.

The register review foreseen for 2013 should be used to tighten disclosure requirements to secure high-quality lobby transparency. ALTER-EU recommends that all consultancies and law firms should have to declare clients' expenditure in the same way, in bandwidths of €10,000. This would be comparable to the reporting requirements in the United States.

Improved transparency on funding sources is crucial. ALTER-EU recommends that registrants are asked to name all government agencies, grant-making foundations, companies and others that contribute to their budget, and to specify the amounts of funding received from each. Small private donations from individuals should be exempt (up to a certain threshold).

Changes in the rules are needed to ensure up-to-date information. ALTER-EU recommends a requirement for all registrations to be updated twice a year, on fixed and known dates, so that transparency and compliance can be improved.

Appendix 1

Companies lobbying the EU institutions but missing from the EU Transparency Register

This list was compiled using directories of corporate EU affairs offices and looking at lists of participants in EU stakeholder consultations. The companies on this list were not on the EU Transparency Register on 12 June 2012. If you spot an error or omission on this list, please contact Erik Wesselius (erik@corporateeurope.org)

1	Abbott SA/NV	http://www.abbott.com
2	ABN-Amro Bank	http://www.abnamro.com
3	Ageas	http://www.ageas.com
4	Agilent Technologies	http://www.agilent.com
5	Aisin Europe SA	http://www.be.aisin-europe.com
6	Alfa Laval Benelux SA/NV	http://www.alfalaval.be
7	Alitalia	http://www.alitalia.com
8	Amazon.Com	http://www.amazon.com
9	Andlinger & Company cvba	http://www.andlinger.be
10	Apple Computer	http://www.apple.com
11	Atos Worldwide	http://www.atosworldline.com
12	Austrian Airlines Brussels	http://www.austrian.com
13	Banco Bilbao Vizcaya Argentaria SA/NV	http://www.bbva.be
14	Bank of Tokyo-Mitsubishi Ltd.	http://www.bk.mufg.jp
15	BBC - British Broadcasting Corporation	http://www.bbc.co.uk
16	Belgacom SA	http://www.belgacom.be
17	Besix Group	http://www.besix.com
18	BioWanze S.A.	http://www.biowanze.be
19	Boehringer Ingelheim	http://www.boehringer-ingelheim.be
20	Bridgestone Europe N.V./S.A.	http://www.bridgestone.eu
21	British Energy	http://www.british-energy.com
22	Brussels Airlines	http://www.brusselsairlines.com
23	Bull SAS	http://www.bull.com
24	Cabot Corporation	http://www.cabot-corp.com
25	Caixa Geral de Depósitos	http://www.cgd.pt
26	Canfor Pulp and Paper	http://www.canfor.com
27	Canon	http://www.canon.be
28	Carlson Wagonlit Travel SA/NV	http://www.carlsonwagonlit.be
29	Chemviron Carbon	http://www.chemvironcarbon.com
30	Cisco	http://www.cisco.com
31	Cytec Industries Inc.	http://www.cytec.com
32	Czech Power (CEZ)	http://www.cez.cz/en/home.html
33	Delhaize Group	http://www.delhaizegroup.com
34	Deutsche Bank AG	http://www.db.com
35	Dexia Banque Belgique S.A.	http://www.dexia.com
36	DHB Bank - Demir Halk Bank (Nederland) N.V.	http://www.dhbbank.com
37	Dresser Europe	http://www.dresser.com
38	DSV	http://www.dsv.com/be
39	Dynamic Parcel Distribution	http://www.dpd.com/be
40	Edeka EU-Liaison Office	http://www.edeka.de
41	Electrabel	http://www.electrabel.be
42	Electrawinds Eastern Europe	http://www.electrawinds.be
43	Eurojobsites Ltd.	http://www.eurojobsites.com
44	European Life Insurance	http://www.europeanlifeinsurance.be
45	Eutelsat Communications S.A.	http://www.eutelsat.com
46	Freudenberg Co. KG	http://www.freudenberg.de
47	GAZ-SYSTEM S.A.	http://www.gaz-system.pl
48	GE Betz, Inc.	http://www.gewater.com
49	Generali Group - Assicurazioni Generali S.p.A.	http://www.generali.com
50	Globalfair.net	http://www.globalfair.net

51	Gorenje gospodinjski aparati, d.d.	http://www.gorenjegroup.com
52	Groupon Sprl.	http://works.groupon.be
53	Holcim IP Ltd.	http://www.holcim.be
54	Hungarian Development Bank - Magyar Fejlesztési Bank	http://www.mfb.hu
55	Huntsman International LLC	http://www.huntsman.com
56	HVB-Group	http://www.hypovereinsbank.de
57	InBev - Anheuser-Busch N.V./S.A.	http://www.inbev.com
58	International Post Corporation	http://www.ipc.be
59	Janssen Pharmaceutica N.V.	http://www.janssenpharmaceutica.be
60	KfW Bank	http://www.kfw.de
61	Knauf Insulation Sprl	http://www.knaufinsulation.com
62	Komatsu Europe International N.V.	http://www.komatsu.eu
63	Koninklijke Ahold N.V.	http://www.ahold.com
64	Lagardère Group	http://www.lagardere.com
65	Lot Polish Airlines	http://www.lot.com
66	Mars Inc.	http://www.mars.com
67	Messe Frankfurt	http://www.messefrankfurt.com
68	Metro Ag	http://www.metrogroup.de
69	Mizuho Corporate Bank	http://www.mizuhocbk.com
70	Monsanto Europe	http://www.monsanto.com
71	MWH Global, Inc.	http://www.mwhglobal.com
72	NCR Corp.	http://www.ncr.com
73	NIIT Technologies Ltd.	http://www.niit-tech.com
74	Nissan EU Representation Office	http://www.nissan-zeroemission.com
75	Northrop Grumman International Corp.	http://www.northgrum.com
76	Novitech A.S.	http://www.novitech.sk
77	Novus Europe	http://www.novusint.com
78	NV Bekaert SA	http://www.bekaert.com
79	Océ-Belgium	http://www.oce.be
80	Oxiteno Europe	http://www.oxiteno.com.br
81	PDC Europe	http://www.pdc-europe.com
82	Philips Medical Systems N.V.	http://www.medical.philips.com
83	Pioneer Hi-Bred International, Du Pont	http://www.pioneer.com
84	Polish Post, Representation Office	http://www.poczta-polska.pl
85	Porsche AG	http://www.porsche.com
86	Rag Beteiligungs-Ag	http://www.rag.de
87	Raytheon International Inc. Europe	http://www.raytheon.com
88	Réseau de transport d'électricité SA	http://www.rte-france.com
89	Rewe	http://www.rewe.de
90	Rhodia S.A.	http://www.rhodia.com
91	Rio Tinto plc	http://www.riotinto.com
92	S.A. Cimenteries CBR	http://www.cbr.be
93	Salzgitter AG	http://www.salzgitter-ag.de
94	Satellite Traffic Management GmbH (T-Systems)	http://www.satellite.com
95	Schlumberger Limited	http://www.slb.com
96	Shanks Group plc	http://www.shanks.be
97	Sharp Corporation	http://www.sharp-world.com
98	Society for Worldwide Interbank Financial Telecommunication - SWIFT SCRL	http://www.swift.com
99	SPE-Luminus N.V.	http://www.spe.be
100	St. Jude Medical Inc.	http://www.sjm.com
101	Subaru	http://www.subaru.be
102	Sumika Chemical Analysis Service	http://www.scas-eu.be
103	Sumitomo Mitsui Banking Cooperation	http://www.smbc.co.jp
104	T-Systems Belgium SA	http://www.t-systems.be
105	Telekomunikacja Polska - c/o Orange Groupe France Telecom	http://www.tp.pl
106	Tenneco Europe	http://www.tenneco.com
107	Teollisuuden Voima Oyj	http://www.tvo.fi
108	ThyssenKrupp	http://www.thyssenkrupp-technologies.com
109	Time Warner	http://www.timewarner.com
110	TNS opinion	http://www.tns-opinion.com
111	TÜV Nord	http://www.tuev-nord.de
112	TÜV Rheinland	http://www.eu.tuv.com
113	TÜV SÜD AG	http://www.tuev-sued.de
114	TYROLIT Schleifmittelwerke Swarovski K.G.	http://www.tyrolit.com

115	Ucb	http://www.ucb.com
116	Unisys Corp.	http://www.unisys.be
117	ViroPharma	http://www.viopharma.com
118	Walt Disney Company Inc.	http://www.disney.com
119	Wirtschafts- und Infrastrukturbank Hessen	http://www.wibank.de
120	Würth Group	http://www.wuerth.com

Appendix 2

EU lobby firms missing from the EU Transparency Register

This list was compiled using directories of EU lobby firms (e.g. the European Public Affairs Directory and EU Stakeholder). For all companies on this list we could find evidence on their websites that they do indeed provide EU lobbying services. The lobby firms on this list were not on the EU Transparency Register on 12 June 2012. If you spot an error or omission on this list, please contact Erik Wesselius (erik@corporateeurope.org)

1	2M Public Affairs	http://www.2mpublicaffairs.be
2	Action-Europe - Cabinet de Conseil en Lobbying et Affaires Publiques	http://www.actioneurope.org
3	Affaires Publiques Consultants	http://www.affairespubliquesconsultants.fr
4	AGEP Association Management	http://www.agep.eu
5	Akkanto	http://www.akkanto.com
6	Alonso & Asociados	http://www.alonsoasociados.com
7	Ampersand European Union Affairs	http://www.ampersand.com.cy
8	Aspect Consulting	http://www.aspectconsulting.eu
9	Barabino & Partners Europe (B&P EUROPE)	http://www.barabinoeurope.com
10	Barbara J. Goldsmith and Company	http://www.bjgco.com
11	Bell-Pottinger Public Affairs	http://www.bell-pottinger.co.uk
12	Business Environment Europe (BEE SA)	http://www.bee.be
13	KLIFOVET BVD	http://www.klifovet.com
14	Cannegieter Consultancy for Regions and Cities	http://www.cannegieter.eu
15	CGP Europe	http://www.cgpeurope.com
16	Chelgate Europe	http://www.chelgate.com
17	Concilius	http://www.concilius.com
18	Congrex	http://www.congrex.be
19	DL International	http://www.dlinternational.be
20	Energys	http://www.energys.com
21	Equality Consulting Ltd.	http://www.equality.hu
22	EU MAP Consulting Ltd	http://www.eumap-consulting.eu
23	EUK Consulting	http://www.eukconsulting.com/category/euk/brussels/
24	Euro P.A. Consulting	http://www.euro-pa-online.com
25	Euro2C	http://www.euro2c.fr
26	Eurofacts OY	http://www.eurofacts.fi
27	Eurokent	http://www.eurokent.eu
28	EuroMédiations	http://www.euromediations.org
29	European Advisory Services (EAS)	http://www.eas.be
30	European Communications	http://www.european-communications.eu/
31	European Consulting Company (ECCO SPRL)	http://www.ecco-eu.com
32	EUTOP	http://www.eutop.com
33	Freshwater	http://www.freshwater-uk.com/public-affairs/europe
34	Fullilove Consulting Group	http://www.fulliloveconsulting.com
35	GBat Beckenham Management and Public Affairs Consultants	http://www.gbatbeckenham.co.uk
36	HANOVER Communications	http://www.hanovercomms.com
37	Hinicio	http://www.hinicio.com
38	I ON EUROPE Public Affairs	http://www.ioneurope.eu
39	ICODA European Affairs	http://www.icoda.eu
40	Impact Brussels	http://www.impactbrussels.com
41	INTEC Strategic Advice GmbH	http://www.intecnet.com
42	Intelligence in Science	http://www.iscintelligence.com
43	JKL Group	http://www.jkl.se
44	Karl Jurka Politik und Marketingberatung	http://www.karljurka.com
45	Ketchum Pleon	http://www.ketchum.com
46	Lobby&Com	http://www.lobbycom.fr
47	MacBrien Cuper Isnard	http://www.macbriencuperisnard.com
48	Media Consulting Group (MCG)	http://www.mediacg.tv

49	Métaphore, Press & Public Relations	http://www.metaphore.be
50	Origami PR Consultant	http://www.origami.be
51	PACT European Affairs	http://www.pacteurope.eu
52	Parodi & Partners SPRL	http://parodi.be
53	Dröge & van Drimmelen	http://dr2.nl
54	PBA (Prague-Brussels Advisory Group) / Josef Zieleniec & Partners	http://www.jzp.cz
55	PDC EU Affairs	http://www.pdceuaffairs.eu
56	Polit Bureau	http://www.politbureau.be
57	Portcullis Public Affairs	http://www.portcullispublicaffairs.com
58	prime	http://www.primegroup.com
59	Public Relations Partners (PRP)	http://www.prp.eu
60	PvanL	http://www.pvanl.eu
61	Quadrant Communications	http://www.quadrant.uk.com
62	Sovereign Strategy	http://www.sovereignstrategy.com
63	SPEM Communication Group	http://www.spem-group.com
64	Spin Partners	http://www.spinpartners.fr
65	Stenström Consulting	http://www.stenstromconsulting.com
66	TGG and Partners	http://www.tgg.hu
67	Wider EU, Advocacy & Projects	http://www.widereu.eu
68	Zenab	http://www.zenab.be Appendix 2

Appendix 3

List of companies declaring less than 3 euros expenses in lobbying

TFI SKOK S.A.	0
Autorep. Müller Ges.m.b.H.	0
Union Credit and Guarantee Hispania, s.l.	0
Société mutuelle d'assurances des collectivités locales	0
FEDERATION DES INDUSTRIES MECANIQUES	0
Réseaux IP Européens Network Coordination Centre (RIPE NCC)	0
ACTUSNEWS	0
FIKE PROTECTION SYSTEMS LIMITED	0
DAIKIN AC SPAIN SA	0
Hazorea Aquatics	0
HeidelbergCement	0
Dufry Group	0
VEVO (UK) LIMITED	0
Dalkia Est	0
Westfalen AG	0
HIGHLAND COLOUR COATERS LIMITED	0
eurolotes	0
EARTHCARE PRODUCTS LIMITED	0
credit cooperatif	0
Slovanet a.s.	0
SPDAD Unip Lda	0
Megaport	1
QED Communication	1
Verdes	1.96
INDUSTRIA PLASTICA TOSCANA	2

Consultancies, consultants and law firms declaring 0-1 euros expenses in lobbying

PI - Portugal Informático	Professional consultancies	0
Fehér Kéményseprők "Országos Társadalmi..."	Professional consultancies	0
ETHICS & BOARDS	Professional consultancies	0
Soltub Ltd.	Professional consultancies	0
Carlos Delgado Villanueva	Professional consultancies	0
Acceleration Management Solutions S.a.m.	Professional consultancies	0
ECONOMIC INSIGHT LIMITED	Professional consultancies	0
GTF Management, Marketing & Communication GmbH	Professional consultancies	0
Authentic Kopi Luwak®	Professional consultancies	0
Avanssa	Professional consultancies	0
ATP Consulting	Professional consultancies	0
International Telecommunications and Space Systems	Professional consultancies	0
Gryphon Carbon Consultancy	Professional consultancies	0
Deep Blue Public Relations	Professional consultancies	0
Payment Systems Europe Limited	Professional consultancies	0
Deloitte LLP	Professional consultancies	0
Llanbury Consulting Limited	Professional consultancies	0
ESTUDIOS TERRITORIALES INTEGRADOS	Professional consultancies	0
JRBH Strategy & Management	Professional consultancies	0
Antonio Iovine	Self-employed consultants	0
Albiez Jean Claude	Self-employed consultants	0
Cabinet Tauthui & Associés	Self-employed consultants	0
Mobile Application&Innovation Engineering...	Self-employed consultants	0
PLANCHE	Self-employed consultants	0
L'Europe à la Une	Self-employed consultants	0
Zero-E B.V.	Self-employed consultants	0
High Brace Ltd	Self-employed consultants	0
Stefano Pierantozzi	Self-employed consultants	0
Common Rights	Self-employed consultants	0
Law Offices	Self-employed consultants	0
Grace Strachan	Self-employed consultants	0
MASS-H Communication	Self-employed consultants	0
RESULTS bvba	Self-employed consultants	0
Mr Przemysław Chudy	Self-employed consultants	0
Iilir Qorri	Self-employed consultants	0
Rocco Attinà Agenzia Immobiliare	Self-employed consultants	0
contrast, European & Business Law	Law firms	0
& De Bandt Advocaten...	Law firms	0
Stephan Balthasar	Law firms	0
Cabinet Avocat Makszem-Dumbraveanu	Law firms	0
IURISMATICA ABOGADOS SLP	Law firms	0
António Vilar, Luís Cameirão & Associados	Law firms	0
Avv. Dr. Alessandro Amicarelli	Law firms	0
KOBER-SMITH & ASSOCIATES LLP	Law firms	0
BERNIÉ MONTAGNIER AVOCATS ASSOCIES	Law firms	0
Graf von Westphalen	Law firms	0
Cabinet Avocat Makszem-Dumbraveanu	Law firms	0
Rödl & Partner	Law firms	0
Asociatia S.O.S. Focsani	Professional consultancies	1
TH Advisors S.r.l.	Professional consultancies	1
Luciano Messori	Self-employed consultants	1
slowly expanding life philosophy and hz	Self-employed consultants	1