

25 January 2024

Dear President Metsola, Commissioner Jourová, and Secretary-General Blanchet

Complaint regarding unregistered influencing activities of The Alliance for Sustainable Management of Chemical Risk (ASMoR)

Further to our previous complaints about the Consumer Choice Center and European Livestock Voice, I am submitting a new complaint regarding the unregistered influencing activities of The Alliance for Sustainable Management of Chemical Risk (ASMoR).

According to its [website](#), ASMoR campaigns on its “common goal to ensure that safe uses of hazardous substances remain permitted”. Its membership [includes](#) various industry associations such as the American Chamber of Commerce to the EU (AmCham EU), the International Bromine Council, the Nickel Institute, and others. Between them these trade associations have a [declared annual lobby spend](#) running into several million euros although ASMoR itself is not in the register, despite clearly being an active lobbyist in its own name.

According to a [briefing](#) for Commission officials, the contacts for the ASMoR secretariat are staff at [Hanover Communications](#) which is 16th on [LobbyFacts](#)’ list of the biggest lobby consultancies in Brussels. Hanover does not list ASMoR as a client in its [declaration](#) to the EU lobby transparency register, although, for example, ASMoR member the Nickel Institute is listed.

ASMoR has been [highly critical](#) of a Commission [study](#) on the upcoming ‘essential use’ concept. In a June 2021 meeting with DG Grow the alliance [promoted](#) the ‘safe use’ concept so as not to ban what it calls “safe products”. Another [meeting](#) with DGs Grow and Environment in November 2022 reinforced the message. ASMoR [says](#) that its aim is to make sure that its members’ views are heard “during key legislative debates”. More information is available in Corporate Europe Observatory’s recently-published [article](#): *How “essential” are hazardous substances?*.

As with European Livestock Voice, ASMoR is another industry lobby group which is not part of the register but which is able to gain access to lobby Commission officials. We are extremely surprised that it appears to be administered by an established Brussels lobby consultancy. I hope that you will investigate ASMoR and Hanover accordingly.

Once again, this case is evidence of the problems with the existing EU lobby register, and its *de facto* voluntary status. We need a legally-binding lobby register to ensure that organisations cannot lobby or influence EU decision-makers without being registered, while those that try would receive meaningful sanctions for non-compliance with the rules.

I look forward to hearing from you about how you plan to take these issues forward.

Yours sincerely,

Vicky Cann
vicky@corporateeurope.org