

Dear Madam, Dear Sir,

We hereby confirm receipt of your complaint regarding registrant **56047191389-84** in the Transparency Register, which will be duly processed, in line with the procedures set out in [Annex IV of the Inter institutional Agreement](#) (IIA) on the Transparency Register.

Please note that your complaint will be examined by the Joint Transparency Register Secretariat (JTRS) who will inform you in due course about admissibility and any further actions, within a period of 15 working days.

The reference number of your complaint is: **[TR-C-2019-91]**.

Please mention this reference in the subject of all correspondence with the Joint Transparency Register Secretariat linked to your complaint.

For further information, please feel free to contact us.

The 'Joint Transparency Register Secretariat'

Contact details	
Title:	Ms
Last Name:	Holland
First Name:	Nina
Email:	nina@corporateeurope.org
Phone:	(+)
Complaint being made on behalf of:	on behalf of an organisation;
Complaint details	
Identification number:	56047191389-84
Organisation name:	Fleishman-Hillard
Clause(s) allegedly breached:	d) ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading; accept that all information provided is subject to review and agree to co-operate with administrative requests for complementary information and updates;
Attachments:	
Information:	Complaint regarding FleishmanHillard's entries to the EU Lobbying Transparency Register. Corporate Europe Observatory hereby submits a complaint regarding FleishmanHillard's and Monsanto's entries to the EU Lobbying Transparency Register covering 2016-2017. Media reports from May 2019 revealed how between October 2016 and December 2017, Monsanto hired FleishmanHillard to compile a vast list of opponents of Monsanto and its products. French authorities are investigating the legality of these actions. Bayer hired Sidley Austin LLP, to handle the affair. It has now become clear that the 'stakeholder lists' were part of a wider lobbying campaign run by FleishmanHillard for Monsanto, to get a new licence for glyphosate (a key ingredient of weedkiller Roundup), in the lead up to a final EU vote in late 2017. Sidley Austin has published a final report, which

reveals information that demonstrates that the entries made by FleishmanHillard and Monsanto to be vastly underestimating the real amounts, and are therefore grossly misleading. Included in the report is the Statement of Work between Monsanto and FleishmanHillard for the Glyphosate Renewal Campaign, covering the EU and the US, and covering the period October 2016 to December 2017. The report shows the contract was worth €14,5 million (\$16.2 million). This is in stark contrast to both companies' entries to the EU Lobbying Transparency Register. FleishmanHillard stated it was paid up to €800.000 in 2016 by Monsanto, and up to €600.000 in 2017, in those years its top client. (It should be noted that FleishmanHillard's entries cover periods of 1 Jan to 1 Dec for both 2016 and 2017, thereby excluding the month of December). Monsanto for its part, claimed its total lobbying budget to be at most €1,45 million between September 2016 and August 2017. These figures are at such discrepancy with the amount of €14,5 million of the FleishmanHillard-Monsanto contract, that it can be regarded as a clear case of misinformation. The misinformation (in the form of false or grossly inaccurate information) by these companies leads to a severe undermining of the credibility of the EUTR, denying EU decision-makers and citizens their right to know about lobbying on an issue of clear public interest (glyphosate) and misleading the public about the size and character of Monsanto's massive influencing efforts. The figure of €14,5 million for this glyphosate campaign had already been revealed in a video-taped deposition by Monsanto's (now Bayer's) Sam Murphey. He was heard by a US District Court in the context of one of the over 18.400 claims from cancer victims to Monsanto over glyphosate. The sum of €14,5 million was clearly destined for lobbying activities covered by the EUTR. Sidley Austin's report provides evidence that FleishmanHillard's activities comprised a full-fledged lobbying campaign targeting key decision makers at EU and member state level. This involved the 'stakeholder lists', weekly updates to Monsanto on outcomes, ongoing strategic counsel for Monsanto leads in Europe and the US, developing campaign messaging and narrative, as well as research briefs "to deliver credible economic and social impact assessments in each country". It included organising direct meetings with key decision-makers, and developing a specific strategy for each member state to obtain a favorable position for glyphosate. Other elements included "recruiting farmers" willing to speak out about their need for glyphosate and mapping non-traditional" stakeholders. Another indirect lobbying focused on influencing the EU debate is the "Let Nothing Go" media campaign. We believe that registrants to the EUTR undermining the credibility of the register to such extent, should be excluded from the register. Evidence in the form of screenshots (.jpegs) could not be uploaded. Sidley Austin report can be found here: www.bayer.com

Was any harm caused to the complainant?

No

Comments:

The misinformation (in the form of false or grossly inaccurate information) by these companies leads to a severe undermining of the credibility of the EUTR, denying EU decision-makers and citizens their right to know about lobbying on an issue of clear public interest (glyphosate) and misleading the public about the size and character of Monsanto's massive influencing efforts.

Was the non-compliance intentional?

I don't know

Comments:

The size of the discrepancy between the lobby expenditure figures presented by FleishmanHillard and Monsanto on the one hand, and the value of the lobbying contract between the two on the other, excludes the possibility of a mere factual error.

Confidentiality:

I authorise the Commission to divulge my identity as part of the administrative procedures necessary to verify the complaint.

Transparency Register:

<https://webgate.acceptance.ec.testa.eu/transparencyregister/public/homePage.do>

Contact the Register:

https://webgate.acceptance.ec.testa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=CONTACT_US

Register your organisation:

<https://webgate.acceptance.ec.testa.eu/transparencyregister/public/ri/registering.do>

Guidelines: [Guidelines](#)

Request European Parliament Accreditation:

https://webgate.acceptance.ec.testa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=EP_ACCREDITATION