

**Complaint to the EU lobby transparency register regarding Orthongel (425944311491-86) and Europêche (2312395253-25)**

Dear Register secretariat,

We are writing on behalf of BLOOM (824008510430-67) and Corporate Europe Observatory (5353162366-85) to make a complaint regarding the two fishing industry lobby groups Orthongel and Europêche.

We consider that breaches of the following elements of the register's code of conduct may have occurred:

*h) not induce Members of the European Parliament, members of the Commission or staff of the Union institutions to contravene the rules and standards of behaviour applicable to them;*

*i) if employing former Members of the European Parliament, members of the Commission or staff of the Union institutions, take the confidentiality requirements and rules applicable to those individuals after leaving the respective institution duly into account, with a view to preventing conflicts of interest*

We consider that Orthongel has breached the rules by appointing Anne-France Mattlet as Chargée de mission internationale / International affairs officer on 1 April 2022. We further consider that, Ms Mattlet's additional role at the EU industry federation Europêche in Brussels where she now leads the lobby's 'Tuna Group', is a similar breach of the rules. We consider these revolving door moves have created huge conflicts of interest and breach the rules in France and at the EU level.

### **Background**

Ms Mattlet was previously employed within the French administration in the area of fisheries policy. From August 2016 to March 2020, Ms Mattlet played a key role within the French administration for negotiating access to African tuna resources for the French industrial fishing fleets. Moreover, from May 2017 to March 2022, she served as Vice-President (2017-2019) and President (2019-2022) of the 'Compliance Committee' of the Indian Ocean Tuna Commission (IOTC), where she presided over its review of the individual compliance of its member states with IOTC conservation and management measures. Compliance committee official documents testify of her continuous, long-term commitment in pursuing this task. As reported in the IOTC documents available on its website (<https://iotc.org/documents>), Ms Mattlet was a member of the EU delegation to the IOTC annual meeting in 2017, and then head or member of the French delegations from 2018 to 2021, participating as Vice-President and President of the 'Compliance Committee'. At each of these meetings, the EU was present with a significant delegation.

### **Orthongel and Europêche**

On 1 April 2022 Ms Mattlet was put 'at the disposal' of Orthongel by the French government for a period of one year (after which she will be able to rejoin the French administration), as Chargée de mission internationale / International affairs officer. Orthongel is the French tuna industry association and Ms Mattlet's activity over the last few months indicates her role as International affairs officer involves intense lobbying activity and influencing of the EU policy agenda. In order to reinforce its lobbying impact, Orthongel has also posted Ms Mattlet to the EU industry federation Europêche in Brussels where she now leads the lobby's 'Tuna Group', which works on issues of tuna

conservation, tuna control regulation, and IOTC quota negotiations. In this position, Ms Mattlet has asked to become an observer at the IOTC which has been granted. This is, of course, the very body within which Ms Mattlet was representing the French administration only weeks before, until March 2022.

This revolving door move did not occur at a random moment nor without a specific reason, as crucial negotiations for tuna fleets from France and Spain are currently underway at the European level on the 'Control Regulation'. Because they use a highly efficient and unselective fishing method (purse seining), these fleets catch massive amounts of unsorted species, including many juveniles of tuna. As a result, and according to Orthongel itself,<sup>1</sup> they are in constant violation of the legal framework, so they have no choice but to throw all their forces into the battle to change the law.

They have so far been successful at the French level as in 2015 the central fisheries administration has granted them the right to trample the current legal framework. But the Commission discovered the trick, and eventually opened an infringement procedure against France.<sup>2</sup> France is now supporting Orthongel's asks within the Council of the European Union, which has adopted them.

We believe that Ms Mattlet's placement by France within Orthongel/Europêche has the sole purpose to influence negotiations on this Control regulation. If they were successful in their endeavour, they would in fact render null and void the infringement procedure opened by the European Commission against France, and would also legalise years of illegal activities. This mission is clear, given the evidence available in the public space. Since 1 April Ms Mattlet has indeed participated in several high-level meetings, for example, with the ministers of fisheries of the Seychelles, Comoros, Madagascar, and Mauritius on behalf of Orthongel/Europêche, that also took a public stance on the ongoing revision of the EU Fisheries Control Regulation, in press releases,<sup>3</sup> and in the media.<sup>4</sup>

We consider that these moves are in clear breach of the French regulation on revolving doors (Article 432-13 of the French Penal Code) which specifies a three-year cooling-off period before a civil servant can join the private sector in the same policy area.

These revolving door moves would therefore also seem to be a breach of the EU lobby register's code of conduct, since she served as a civil servant from May 2017 to March 2022 (as Vice-Chair and then Chair) of the Compliance Committee of the IOTC, to which both the EU and France are members.

## Complaint

In summary, Ms Mattlet played a key role within the IOTC, on behalf of the French administration, and in which the EU participates with the largest delegation of all member states. Even though she was not on the payroll of an EU institution, she played a key role as a French civil servant, in an institution that matters greatly to the EU's interests. She is now actively working to influence EU fisheries policies on behalf of two industry trade associations, with a view to avoid a condemnation for France, and to legalise years of wrongdoings by the industry.

---

<sup>1</sup> See e.g. <http://orthongel.fr/special/MargeTolerance/Infographie-actionsOP-MoT-en.pdf>.

<sup>2</sup> [https://ec.europa.eu/commission/presscorner/detail/%20en/inf\\_22\\_5402](https://ec.europa.eu/commission/presscorner/detail/%20en/inf_22_5402).

<sup>3</sup> <https://europeche.chil.me/post/eue28099s-control-regulation-threatens-french-tuna-purse-seine-fleet-with-extinc-412771>.

<sup>4</sup> <https://thefishingdaily.com/latest-news/eus-control-regulation-threatens-french-tuna-purse-seine-fleet-with-extinction-by-2026/>.

We thus call on you to urgently investigate Ms Mattlet's activities further, and to assess whether the revolving doors situation identified here, at a time when the negotiations for the revision of the EU Fisheries Control Regulation are in trilogue, are in breach of the EU lobby register's code of conduct.

This case of revolving door is causing indirect harm to us as complainants, due to its implications on the financial interests of the EU and coastal states in the Indian Ocean, and in the face of biodiversity collapse and climate breakdown. We consider that such moves totally undermine efforts for an EU fisheries policy, which should prioritise the public interest and sustainability, over industry profits. We cannot speak directly to the intention or not of compliance with the EU lobby register's code of conduct but are confident that the two industry lobbies were fully aware of Ms Mattlet's background when they hired her.

We look forward to hearing from you.

Yours sincerely,

Claire Nouvian  
**BLOOM**

Vicky Cann  
**Corporate Europe Observatory**