

19 July 2023

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

Complaint regarding influencing activities of the Consumer Choice Center

I am writing to you as representatives of the three institutions responsible for the EU lobby transparency register, regarding the Consumer Choice Center and an article by *Desmog* published on 12 July: <https://www.desmog.com/2023/07/12/consumer-choice-center-koch-oil-european-parliament-lobbying/>

The Consumer Choice Center (CCC) is based in Washington DC and styles itself as a consumer advocacy group that “represents consumers in over 100 countries across the globe”. On its website, which lists 62 staff members, the group says that it has previously been funded by the energy, chemical, and airlines industries, but it does not publish its current funders.

As detailed in the article, the CCC used to be registered in the EU lobby transparency register (its previous registration is available in the LobbyFacts archive: <https://www.lobbyfacts.eu/datacard/consumer-choice-center?rid=326140126649-42>). The group declared spending €250,000 on EU lobbying in 2020 and employed 16 lobbyists. However it was removed from the register in May 2022 after a quality check by the register secretariat, and followed the introduction of new disclosure rules requiring more transparency over funding sources.

But no longer being part of the register has not affected the CCC’s ability to be active, trying to influence policy debates in the EU Brussels bubble. Since May 2022, according to *Desmog*, it has written almost 50 articles for media outlets on EU issues, the majority of these published in EU outlets, including the *Brussels Times*, and the *Parliament Magazine*. According to its [website](#), it was also apparently “appointed by MEPs for Innovation, Brands and Intellectual Property” to provide secretarial support to MEPs4Innovation. The CCC website says that this group has “more than 30 members coming from different political groups and EU Member States”. The CCC [displays](#) the European Parliament’s logo on its website which is surely a breach of the register’s Code of Conduct.

This case demonstrates many of the problems with the existing EU lobby register. The CCC is an organisation which was removed from the register for non-compliance with the transparency rules. Yet it continues to perform influencing activities towards the EU institutions, seemingly without hitch. It gets away with using the European Parliament logo, presumably for added credibility.

None of the conditions put in place by the EU institutions to try to make registration obligatory under the current voluntary regime, such as meetings with Commissioners or European Parliament access passes, have apparently made much difference to this organisation’s ability to be active.

As a result the CCC is a perfect example of why we need a legally-binding lobby register, as indeed the European Parliament has demanded for many years. That is the only way to ensure that organisations cannot lobby or influence EU decision-makers without being registered, while those that try to would receive meaningful sanctions for non-compliance with the rules.

The post-Qatargate responses of the EU institutions have so far delivered very disappointing results and the need for a legally-binding lobby register has not received the attention that it deserves. Instead, the civil society sector as a whole has been subjected to unwarranted politically-motivated mud-slinging regarding their sources of funding, deflecting political and media attention away from organisations that are actually involved in untransparent and problematic interference in EU decision-making, such as CCC.

In the short term, we propose that:

- The European Parliament conducts an investigation into the CCC and its links with MEPs, including its lobbying and influencing activities and MEPs4Innovation. The European Parliament logo should be removed from the CCC website, and MEPs should be warned about the CCC and asked to not participate in its activities. MEPs should not meet with unregistered lobby groups.
- The European Commission should also conduct an investigation into whether the CCC is influencing its own work and ensure that no Commission official meets with any unregistered lobby group.
- The Register secretariat should be informed about this complaint and the investigations' findings.

These measures will not be adequate to the job of tackling unregistered lobbying. As discussed above, only a legally-binding lobby register will have the tools, sanctions, and capacity required to make serious inroads into this problem. But in the short-term, such actions would indicate that the EU institutions are serious about tackling the problem of unregistered influencing.

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

Yours sincerely,

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