

12 July 2023

**Complaint to the EU lobby transparency register regarding Kreab**  
1078390517-54

<https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=1078390517-54>

**Clause(s) of Code of Conduct allegedly breached:**

(j) where engaged in a client-intermediary relationship:

(i) ensure that the parties in such a relationship are entered in the register;

**I would like to bring to the attention of the Secretariat of the Transparency Register the following information:**

For the financial year of 2022 Kreab, one of the largest lobby consultancy firms in Brussels, declared working for Archroma, a major chemicals producer, receiving up to €200,000 for work on the “REACH restriction proposal on PFHxA, REACH restriction proposal on all PFAS, EU POP Regulation...”. Archroma is one of several chemicals industry clients held by Kreab, and Archroma was among its biggest clients in 2022. In 2023, Archroma is also declared as a client by Kreab. However, Archroma is not registered in the EU lobby transparency register today. The LobbyFacts’ archive (dating back to back to 2012) indicates that Archroma has never been registered.

Kreab is clearly active on behalf of Archroma towards the EU institutions. This document ([https://corporateeurope.org/sites/default/files/2023-07/Doc%2027%20-%2020230320%20-%20Ares%282023%292001017%20-%20Email%20from%20Kreab%20of%20230317%20-%20PFhA-PFAS\\_Redacted.pdf](https://corporateeurope.org/sites/default/files/2023-07/Doc%2027%20-%2020230320%20-%20Ares%282023%292001017%20-%20Email%20from%20Kreab%20of%20230317%20-%20PFhA-PFAS_Redacted.pdf)) received from DG Grow via access to documents indicates that Kreab helped facilitate a March 2023 meeting with DG Grow for Archroma so that it could present its arguments for an opt-out from proposed regulation for its PFAS (‘forever chemicals’) products. Kreab also made a follow-up representation to DG Grow as “consultant for Archroma”.

We consider that this is a clear breach of the register’s Code of Conduct (J,i) in that lobby intermediaries have a clear responsibility to ensure that their clients are registered. Archroma is clearly an active EU lobbyist.

**Was any harm caused to the complainant?:**

No.

**Was the non-compliance intentional?:**

I don't know, but companies whose main business is lobbying should be well aware of the rules governing the EU lobby transparency register.

Moreover PFAS ‘forever chemicals’ are a matter of deep public concern and the subject of ongoing EU regulatory processes. It is extremely worrying to learn that a major industry player is able to gain access to the Commission without being registered.