



Secretariat of the Transparency Register

Mr Bram Vranken

Corporate Europe Observatory

Sent only by email to:

bram@corporateeurope.org

Ref.: TR-C-2023-235

Dear Mr Vranken,

I refer to the complaint you submitted on behalf of Corporate Europe Observatory on 28 November 2023 (TR-C-2023-235) to the Secretariat of the Transparency Register (the Secretariat) regarding Amazon Europe (TR REG: 366117914426-10) alleging that it has breached points (f) and (j)¹ of the Transparency Register Code of Conduct². On 21 December 2023, you were notified of the Secretariat's decision to find your complaint admissible and to open an investigation.

In your complaint, you alleged that, in its registration, Amazon Europe appeared to be under-declaring its lobbying budget. You also alleged that Amazon Europe did not report its relationship with two think tanks: Centre for European Policy Studies (CEPS) and Center for European Reform (CER) with which it was collaborating. You claimed that this could amount to a breach of point (f) of the Code of Conduct by the registrant. Your complaint pointed to two intermediaries declared by Amazon Europe, which were not registered in the Transparency

(¹) 'Registrants shall operate in line with the rules and principles set out in this Annex. In particular, registrants shall:

[...]

f) ensure that the information that they provide upon registration, and subsequently administer in the framework of their covered activities, is complete, up-to-date, accurate and not misleading, and agree to that information being made available in the public domain;

[...]

j) where engaged in a client-intermediary relationship: (i) ensure that the parties in such a relationship are entered in the register; and ii) as clients or intermediaries, ensure that the relevant information concerning the relationship entered in the register pursuant to Annex II is published.'

(²) Annex I to the Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register, OJ L 207, 11.6.2021, p. 1.

Register at the time of the complaint: Leading Edge Global Communications and Telage. In this regard, you highlighted the requirement set out in point (j) of the Code of Conduct in relation to client-intermediary relationships. You also wrote to the Secretariat on 28 November 2023 asking that these companies, acting as intermediaries for Amazon Europe, be invited to register in the Transparency Register.

The Secretariat notified the registrant of your complaint on 21 December 2023. Following the initial stage, several exchanges were held between the registrant and the Secretariat to clarify the role and activities of the intermediaries and think tanks concerned. Two meetings were held with the registrant, in line with the procedures set out in the IIA (c.f. point 5.2 of Annex III), where the Secretariat asked for information about the registrant's contacts with think tanks as well as the methodology used to determine which costs to allocate. During the period of investigation, several updates were performed by the registrant, in accordance with the Secretariat's recommendations.

Regarding the specific matters raised in your complaint, the Secretariat can inform you that:

- Telage and Leading Edge registered in the Transparency Register on 16 January and 15 April 2024 respectively. Both included Amazon Europe in their list of clients.
- In its update of 8 March 2024, Amazon Europe declared to be a member of both think tanks CEPS and CER under the appropriate heading in its registration.
- On 30 August 2024, Amazon Europe updated the financial information in its registration, providing total estimated annual costs related to activities covered by the register of €5,000,000 - €5,499,999 for 2023, which include a relevant proportion of the fees paid to think tanks.

As a result, the Secretariat finds that Amazon Europe has acted upon the complaint and the issues identified, giving in-depth and reasoned responses whilst also performing all the required updates of its data. The Secretariat finds that Amazon Europe is reporting its relations to the intermediaries identified and the latter are, in turn, registered. Amazon Europe also reports its relations to think tanks and provides a proportionate share of its membership costs for the covered activities carried out in partnership with such think tanks.

In the light of the above, the Secretariat considers that the registrant has cooperated sincerely and constructively in the investigation and has performed the necessary updates to the information in its registration to remedy any non-observance of points (f) and (j) of the code of conduct.

The Secretariat is hereby notifying you of its decision to close the investigation, in line with the procedures laid down in Annex III to the IIA.

Please do not hesitate to contact us if you have any further questions concerning this procedure and its outcome.

Sincerely,

Fernando FLORINDO
Coordinator of the Secretariat of the
Transparency Register