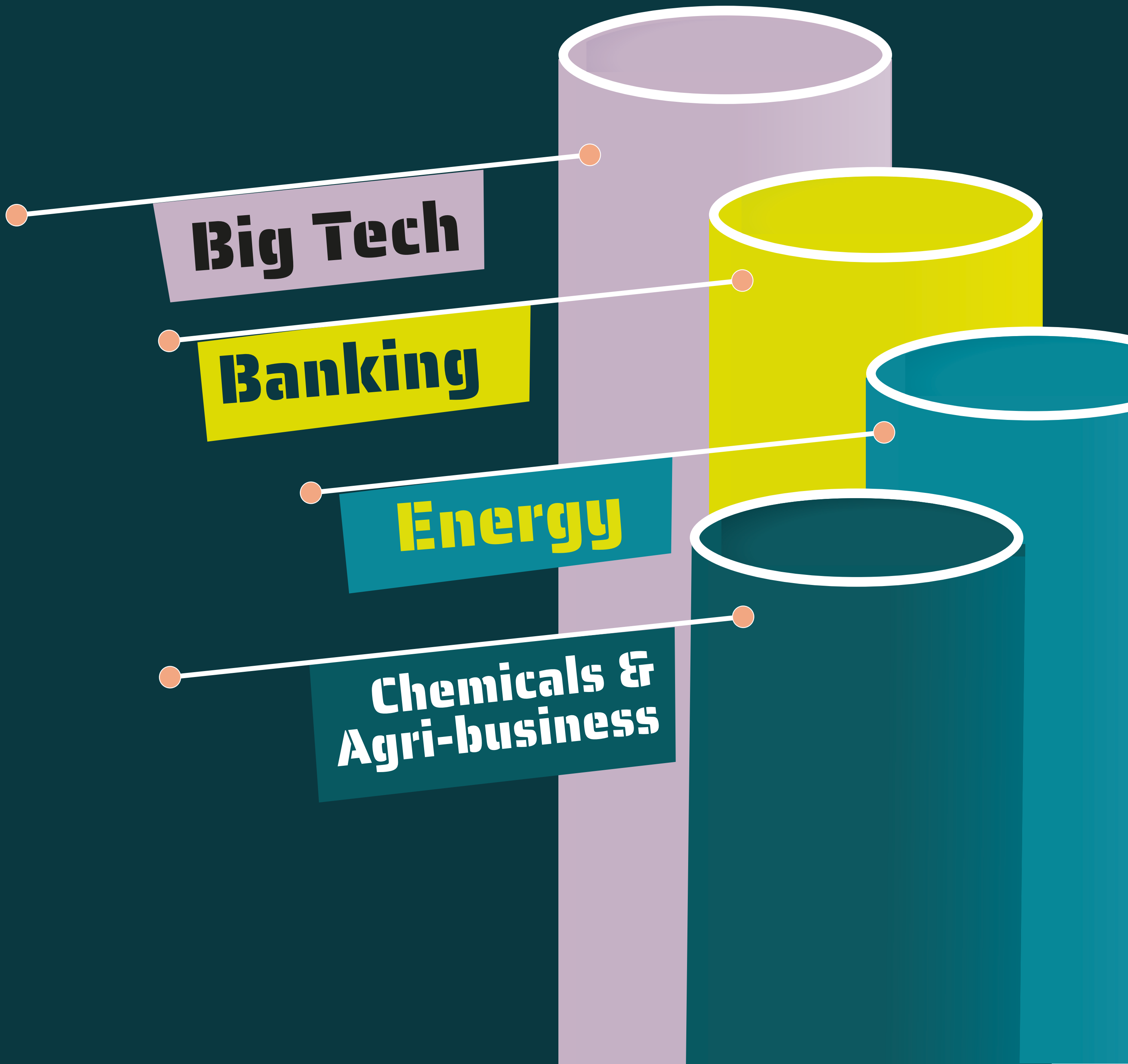
THE EU'S LOBBY LEAGUE TABLE

LOBBY CONTROL

Corporate Europe Observatory



SUMMARY

The EU's lobby league table: Tech, Banking, Energy, Chemicals dominate

24 February 2025

Summary

Corporate Europe Observatory and LobbyControl reveal the sheer corporate lobby firepower in the EU, analysed by sector. Big Tech, Energy, Banking, and Chemicals dominate.

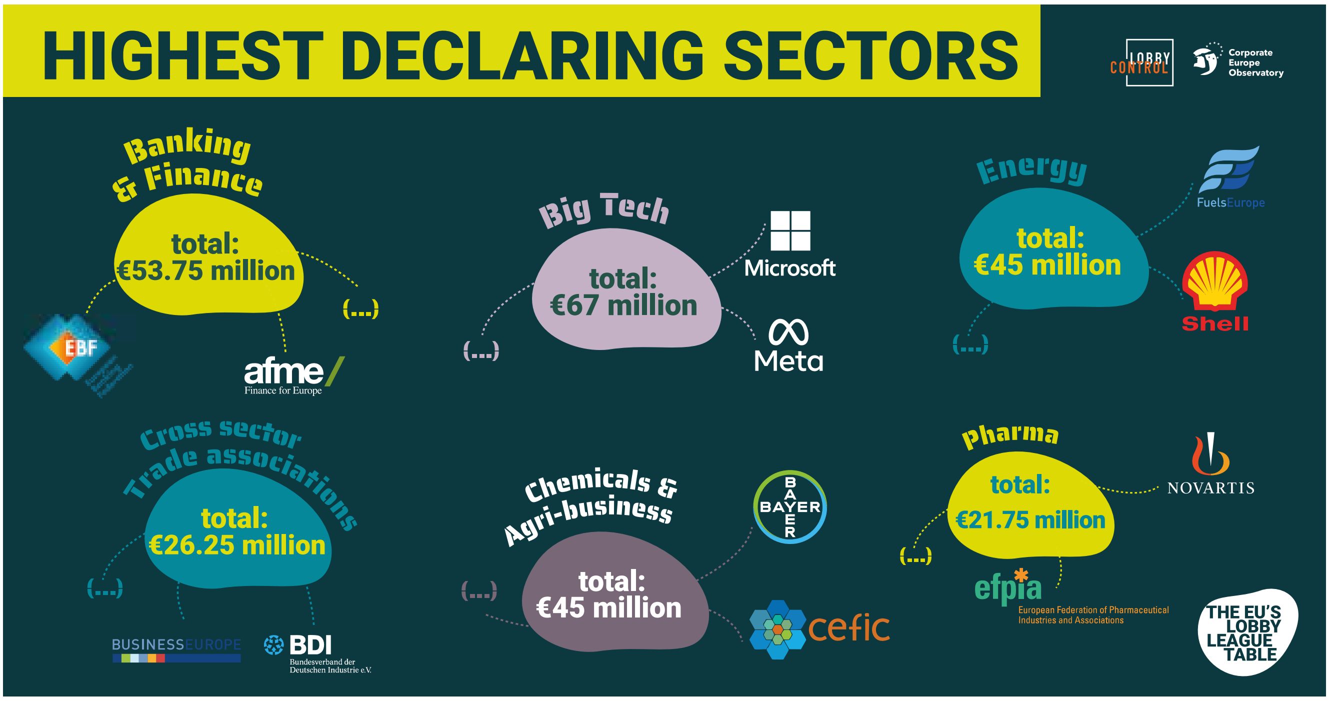
Based on information from our ***LobbyFacts*** *database, we reveal the 162 corporations and trade associations that are spending at least €343 million on EU lobbying. That's a budget increase of one third since 2020. The total only includes those declaring €1 million or more annual spend; the true sum of all corporate spending on EU lobbying would be significantly higher.*

And their influencing efforts are succeeding, given the European Commission's current plans for an aggressive deregulation agenda, and a replacement of green policies by the so-called 'Clean Industrial Deal' – over which Big Polluters have had a huge sway.

Our analysis shows EU decision-making faces a real risk of regulatory capture, and there are next to no effective protections in place. Rather, corporate competitiveness is being prioritised over democratic values and social and environmental protections.

1. WHO ARE THE LOBBY BIG SPENDERS – AND WHAT TO DO ABOUT THEM?

New **analysis** by Corporate Europe Observatory and **LobbyControl**, pulled from our online database **LobbyFacts**, gives us a glimpse of the lobby spending firepower of the corporate sector in Brussels. The 162 corporations and trade associations (declaring over €1 million annual expenditure on EU lobbying) collectively spend at least €343 million a year. That's 13 per cent more than this time last year, and €86 million more since 2020, an increase of one third over the past 5 years. **[See data sheet A.]** Moreover, these numbers are likely to be substantial under-estimates: the true total of all corporate spending on EU lobbying will be significantly higher (see Section 3). All data is correct as of 8 February 2025.



The highest-declaring sectors are **Big Tech** (including **Meta**, **Microsoft**); **Banking & Finance** (including **Association for Financial Markets in Europe**, **European Banking Federation**); **Energy** (including **FuelsEurope**, **Shell**); **Chemicals and Agri-business** (including **European Chemical Industry Council**, **Bayer**); the **cross-sector trade associations** (**BusinessEurope**, **Bundesverband der Deutschen Industrie**); and **Pharma** (**European Federation of Pharmaceutical Industries and Associations**, **Novartis**). As explained below this league table reflects recent lobby battles and trends.

These huge sums for EU lobbying by the top declaring corporate interests are clearly paying off, considering the accelerating pro-business agenda of the second von der Leyen Commission. Almost a year to the day since many dirty industries presented their policy demands in person to President Ursula von der Leyen via the **Antwerp Declaration**, this week (26 February) she will return to Antwerp to tell industry how she will deliver on its agenda. The so-called Clean Industrial Deal looks set to deliver corporate welfare and false climate solutions, while ignoring the imperative to tackle environmental pollution and deliver on social justice. Meanwhile relentless corporate lobbying has already secured the **Competitiveness Compass**, a sweeping deregulation agenda which puts so-called 'corporate competitiveness' as the Commission's overarching goal. In reality this will be a bonfire of regulations made at the expense of democracy and social and environmental protections.

It is ironic that in recent months some media and the political right have been totally preoccupied with the **non-story** of €15 million received by green NGOs from the EU's LIFE funding programme – which covers all sorts of civil society activities – while under their noses, the biggest corporate lobbies have spent at least €343 million a year on EU lobbying, including a €41 million increase just in the past year.[1] Indeed, as detailed below, we consider that a number of corporate interests may well be under-reporting their lobby declarations. While these sums and activities are not directly comparable, it is extremely concerning that the EU institutions are so responsive to industry lobby demands, while at the same time many politicians are seeking to **restrict** civil society space and engagement in Brussels and across Europe. This should give all reasonable decision-makers serious pause for thought.

As LobbyControl pointed out in its **EU Lobby Report 2024** corporate lobbyists use numerous persuasion techniques ranging from face-to-face meetings and commissioned studies, to covert influencing through front groups and micro-targeted advertising. They recruit former politicians with valuable contacts via the 'revolving door'. Their vast resources and nuanced strategies raise concerns about the EU institutions' ability to resist undue influence. That's why the EU institutions need to rethink their lobby rules.

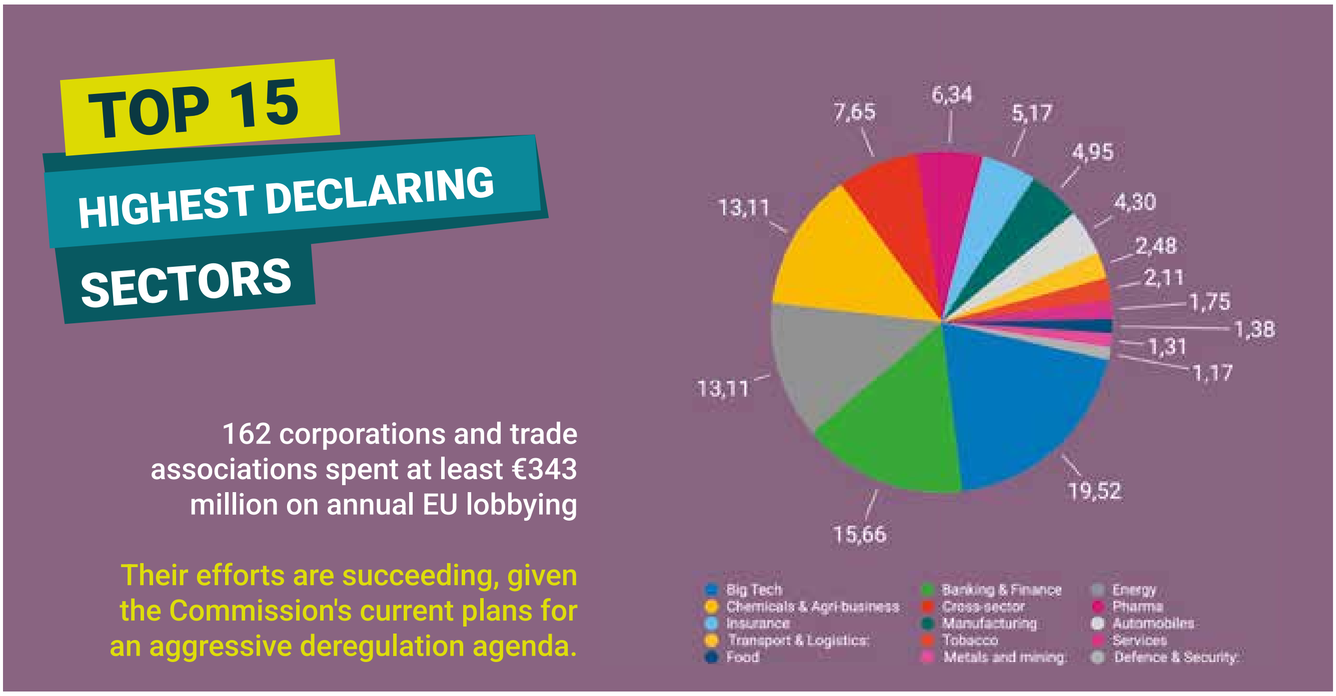
It's clear that EU decision-making faces a real risk of regulatory capture, and there are next to no effective protections in place. This analysis reinforces the case for lobby firewalls to protect public decision-making. The EU institutions are already committed to protect its decision-making from tobacco lobby influence but this is very **imperfectly implemented**. Meanwhile the rationale to extend such a lobby firewall approach to protect action on the climate and environmental pollution crises is compelling. As a first step the Commission

1 Neither Corporate Europe Observatory nor LobbyControl receive EU funding.

should stop providing privileged access to industry lobbies and ensure that civil society and community voices are heard loud and clear.

As **Corporate Europe Observatory** and **LobbyControl** have pointed out for **years**, the current transparency and accountability tools at the EU level are inadequate. The flagship instrument, the EU Lobby Transparency Register, run by the Commission, Parliament, and the Council, remains riddled with inaccurate data. As detailed below in our methodology, within a complete dataset of 175 declared spenders of €1 million or more, we identified at least 12 entries where that level of lobby spending seemed implausibly high.[2] Meanwhile the ongoing issue of under-reporting lobby expenditures by some of the Brussels bubble's most active corporate lobby groups again reflects the lack of scrutiny by policy-makers. A legally-binding lobby register is the only way to deliver meaningful sanctions for posting inaccurate data and to therefore drive up the overall quality of the lobby data on the EU register. The register will be **reviewed** by July 2025; introducing a legally-binding register is long overdue.

The full data analysis is available **here**.



2 The 12 suspected over-reporting registrants as of 8 February 2025 are: Federation of Employers of Ukraine, Trinomics B.V., FIWARE Foundation, KONE Corporation, RailNetEurope, ITTI Sp. z o.o, Kontomatik Sp. z o.o, Charleroi Entreprendre, CFA Institute, GreenGo Energy Group, Bioiberica SAU, Assorisorse - Risorse Naturali ed Energie sostenibili. A 13th entry was removed as it seemed to be wrongly categorised as a company. See **sheet B** for more detail.

2. WHAT DO THE MAJOR EU LOBBY LEAGUE PLAYERS WANT?

a. Big Tech's renewed attack against the EU's digital regulation

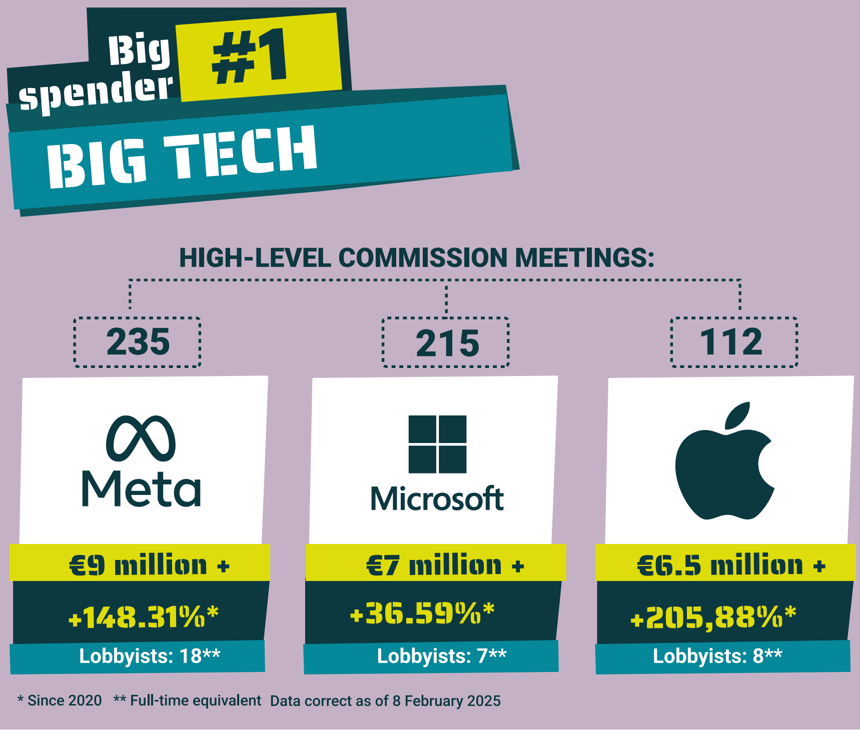
During the first von der Leyen mandate, the EU passed unprecedented legislation to rein in the worst excesses of Big Tech's toxic business model and curtail its monopoly power. Although a step in the right direction, these rules were often **heavily lobbied** by the tech giants. The last Commission's efforts are now coming under renewed attack.

Big Tech firms have sought to curry favour with the new Trump administration by making generous donations to his inauguration, and by weakening content moderation rules. In exchange, tech firms have successfully **weaponised** the US Government against the EU's digital regulation. For instance, **Meta** / **Facebook**'s Chief Executive Mark Zuckerberg has **called** the EU's enforcement of competition rules "almost a tariff" and European digital laws as "censorship". At the recent AI Action Summit in Paris, US Vice-President Vance **railed** against EU data protection rules and the regulation of AI.

At the same time, the EU's competitiveness frenzy has opened the door to weakening digital regulation. The Draghi report singled out the GDPR on data protection and the AI Act as barriers to competitiveness. Big Tech has quickly used this political momentum and its massive lobby resources to **attack** the EU's digital rules. Facebook, for instance, launched the **misleading** campaign **EUneedsAI** to create the impression that a broad coalition of European companies is asking for weaker data protection rules.

Big Tech's aggressive lobbying is not without impact: the enforcement of tech regulation is under increasing pressure. And recently, the lead commissioner Henna Virkkunen announced that the already **watered-down AI Act** will be part of one of the upcoming Omnibus proposals in order to make it more 'innovation-friendly'.

Of those declaring more than €1 million, Big Tech's EU lobby spend has risen 57 per cent since 2020.



- Tech firms weaponised the US Government against the EU's digital regulation
- The EU's competitiveness frenzy opened the door to weakening digital regulation
- Draghi report singled out the GDPR and AI Act as barriers to competitiveness
- Facebook launched misleading campaign EUneedsAI to create the impression that European companies are asking for weaker data protection rules.

b. Banking & Finance want dangerous deregulation

The finance sector has a big interest in the Clean Industrial Deal. It is assumed that it implies additional investments in Europe to the sound of €800 billion annually, part of which is supposed to come from financial markets through, among other things, a so-called Capital Markets Union which is to facilitate the trade in speculative financial products. But the sector has defensive interests too. The finance lobby are first in line to **criticise** the Commission's plan to take a small step towards stopping speculation from driving high energy prices, particularly voiced via the lobby group that comprises the worlds biggest banks and investment funds, **the Association for Financial Markets in Europe.**

AFME has been at the forefront of campaigns for deeper liberalisation of financial markets since the organisation was founded in 2009 – at a time when the world was still in the grip of a financial crisis that had cost millions their jobs and/or houses. The crisis was the result of heavy deregulation and liberalisation, both in the United States and in the EU. In particular, highly risky securitisation played a major role, and was – for a while – considered too dangerous. But under the slogan of a Capital Markets Union, the finance lobby has pushed effectively to reopen such trades and have their eyes on making its approval less cumbersome. To that effect, AFME would like to see further initiatives under the Capital Markets Union to **weaken regulation** in the field, including by 'simplifying' the criteria for securitisation.

More generally speaking, private finance is assumed to be the main driver of investments and of a new industrial policy that is to make production cleaner and energy cheaper, but that is not supported by evidence. Indeed, the Capital Markets Union is hardly the magic bullet it is made out to be, as argued in several **critical reports.**

Of those declaring more than €1 million, this sector's EU lobby spend has risen 11 per cent since 2020.

Big spender #2

BANKING & FINANCE

After the crisis that followed a period of deregulation and liberalisation of financial markets, the sector now aims do to a make-over and create a so-called Capital Markets Union, to facilitate the trade in speculative financial products.

HIGH-LEVEL COMMISSION MEETINGS:

	afme Finance for Europe	EBF European Banking Federation	VÖB die öffentlichen Banken
High-level Commission meetings	75	78	29
Lobby spend	€4.5 million +	€4 million +	€3 million +
Change	-7,69%*	-8,57%*	+4,35%*
Lobbyists	17**	12**	19**

* Since 2020 ** Full-time equivalent Data correct as of 8 February 2025

c. Big Energy pushes failed techno-fixes over fossil fuel phase-out

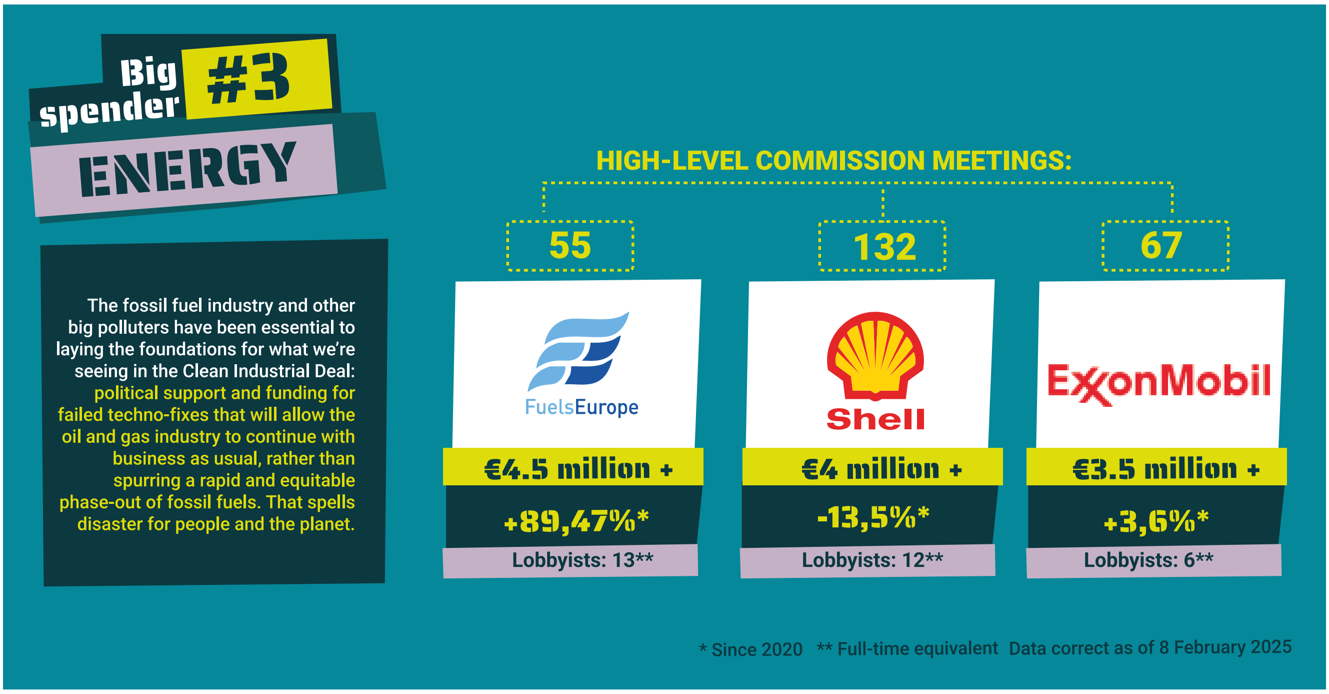
Big Energy has been enormously influential in Brussels, so it's no surprise that so many are among the biggest spenders in Brussels.

The Commission's flagship European Green Deal had the **fingerprints** of the fossil fuel industry and other polluters all over it. So did the EU's **Green Deal Industrial Plan**, announced in response to the US subsidies programme, the Inflation Reduction Act (IRA). Both have laid the foundations for what we're seeing in the Clean Industrial Deal: political support and funding for failed techno-fixes that will allow the oil and gas industry to continue with business as usual rather than spurring a rapid and equitable phase-out of fossil fuels. That spells disaster for people and the planet.

A big win is on finance, as the competitiveness agenda (as outlined in Draghi's report), and therefore its centrepiece, the Clean Industrial Deal, are all about public spending on new infrastructure for the energy transition. Unfortunately that means technologies like **failed carbon capture and storage (CCS)** – which five years ago were thought dead and buried – are now eligible for billions in public subsidies thanks to the likes of **Shell** and its trade association **FuelsEurope**, two of the biggest spenders in Brussels. The spending taps have also been turned on for **hydrogen**, another favourite of the fossil fuel industry (99 per cent of hydrogen is made with dirty energy). The Commission intends to slash permitting processes so it can criss-cross Europe with pipelines and infrastructure to store and transport hydrogen, CO_2 and gas, despite vocal opposition from local communities, civil society, and scientists.

Particularly worrying is how determined von der Leyen and her team have been to put Big Energy in the driving seat. They have created industry-led alliances on **hydrogen** and **raw materials**, an industry **forum on CCS**, and an industry-only **advisory group** on securing new gas. Industry is pushing to expand all of these bodies into new areas to ensure it continues to set the agenda and attract more public funding.

As our analysis shows, of those declaring more than €1 million, Big Energy's EU lobby spend has risen 44 per cent in the last five years.



d. Chemicals and Agri-business defend toxic products from safety rules

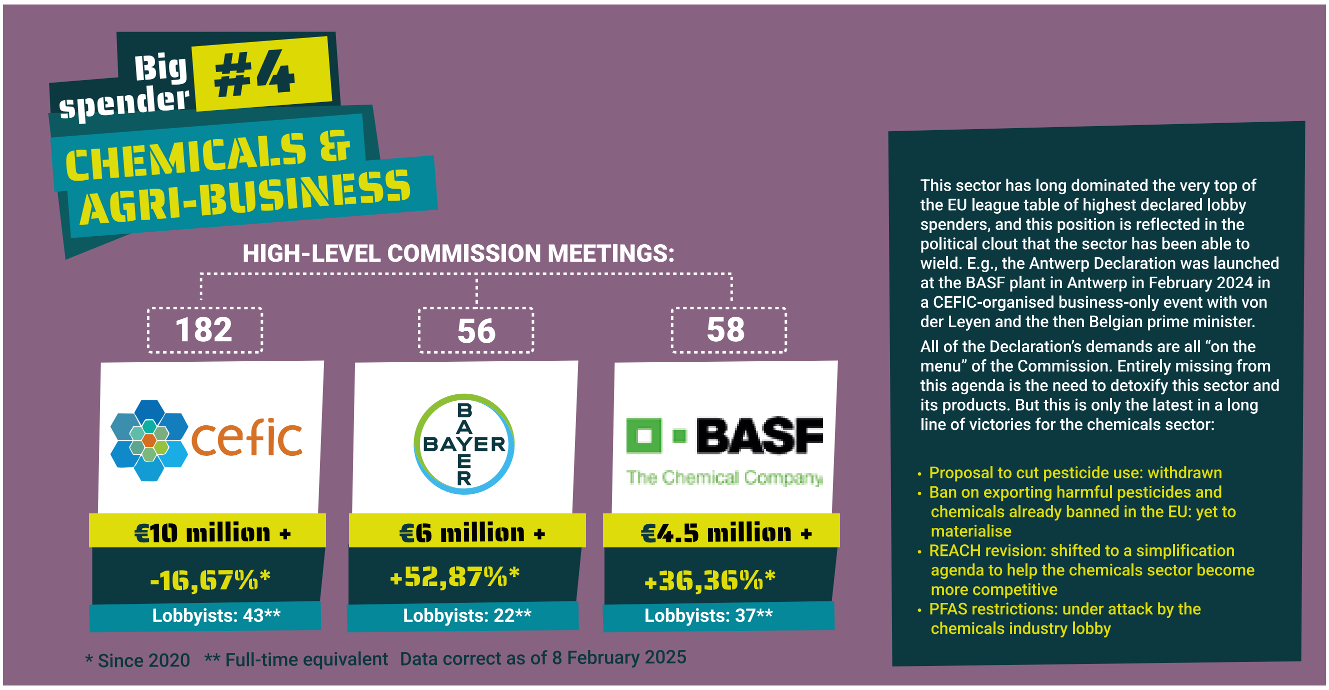
This sector, comprising those producing pesticides, fertilisers, biotech, plastics, and chemicals used in industrial processes and consumer products, has long dominated the very top of the EU league table of highest declared lobby spenders.

And this position is reflected in the political clout that the sector has been able to wield. Take the **Antwerp Declaration**, an initiative coordinated by the **European Chemical Industry Council** (CEFIC) supported by other intensive energy industrial users, which was launched at the BASF plant in Antwerp in February 2024 in a business-only event with von der Leyen and the then-Prime Minister of Belgium. **Analysis** by Corporate Europe Observatory indicates that the demands from CEFIC presented in Antwerp last year are all "on the menu" of the Commission, and are likely to be reinforced and even name-checked by this week's von der Leyen speech and Clean Industrial Deal announcement. Entirely missing from the Antwerp Declaration agenda is the need to detoxify this sector and its products.

But this is only the latest in a long line of assaults by the chemicals sector on people's health and our environment. A legislative proposal on cutting pesticide use was withdrawn following industry lobby **sabotage** via a misleading industry scaremongering campaign over food security concerns set up by Croplife Europe. The focus of the revision of the main EU chemicals legislation REACH has shifted from speeding up the removal of harmful chemicals from the market, to a simplification agenda to help the chemicals sector become more competitive, alongside a Chemicals Industry Package. Meanwhile the **promised ban** on exporting harmful pesticides and chemicals already prohibited in the EU has been repeatedly postponed.

And as **reported** last month, the chemicals industry lobby is running a huge, **misleading** campaign to weaken and even derail the proposal to restrict PFAS 'forever chemicals'. A number of PFAS chemical producers included in this analysis such as **Chemours** and **Honeywell** have massively increased their declared lobby spend in the past year (by 150 and 300 per cent respectively), while the Commission has already been sending some extremely **industry-friendly signals** about how it will handle the PFAS proposal when the file finally reaches its desk.

Of those declaring more than €1 million, overall this sector has increased its EU lobby budget by 32 per cent since 2020.

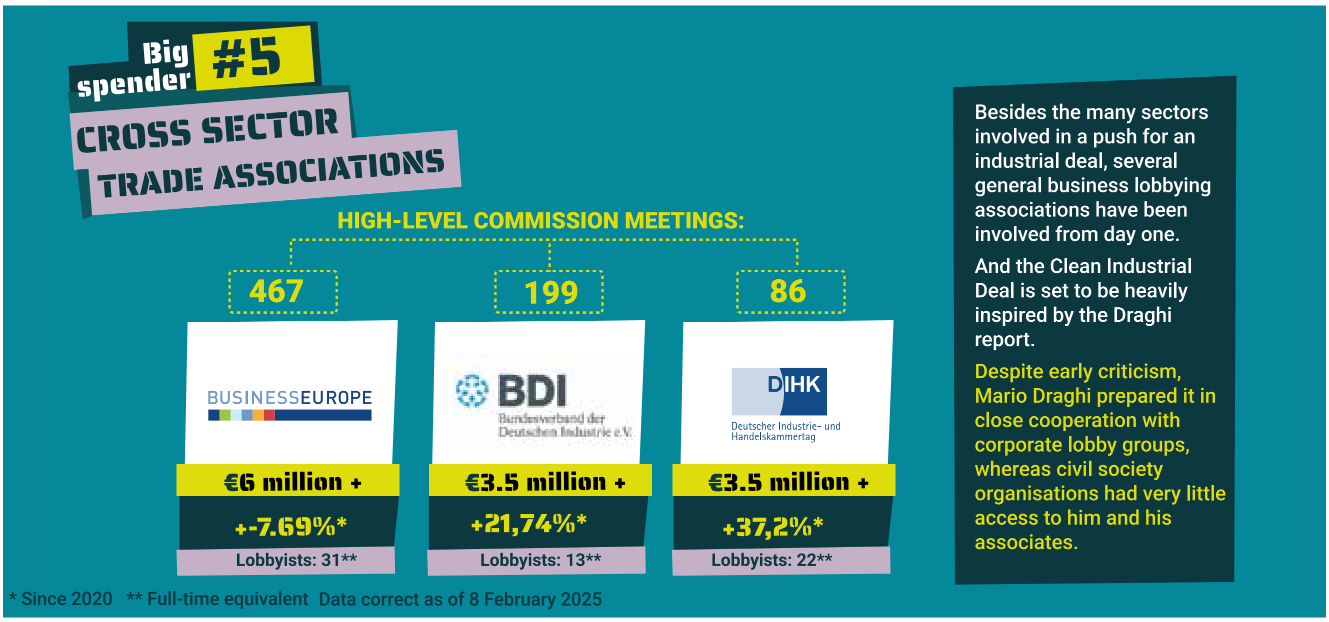


e. Cross-sectoral business groups push for industrial deal

Besides the many sectors involved in a push for an industrial deal, several general business lobbying associations have been involved from day one. First and foremost, the employers' association **BusinessEurope**, a **heavyweight** on the lobbying scene, has been omnipresent and helped make the crucial meeting in Antwerp a success for industry in general and for energy-intensive industries in particular. In terms of demands, BusinessEurope **prioritises** lower energy prices and deregulation, including faster permitting that could include quicker approval of, for example, mining or energy infrastructure projects. Most of the high-level **meetings** the organisation has had with the Commission in the past year were about the Clean Industrial Deal, or elements thereof.

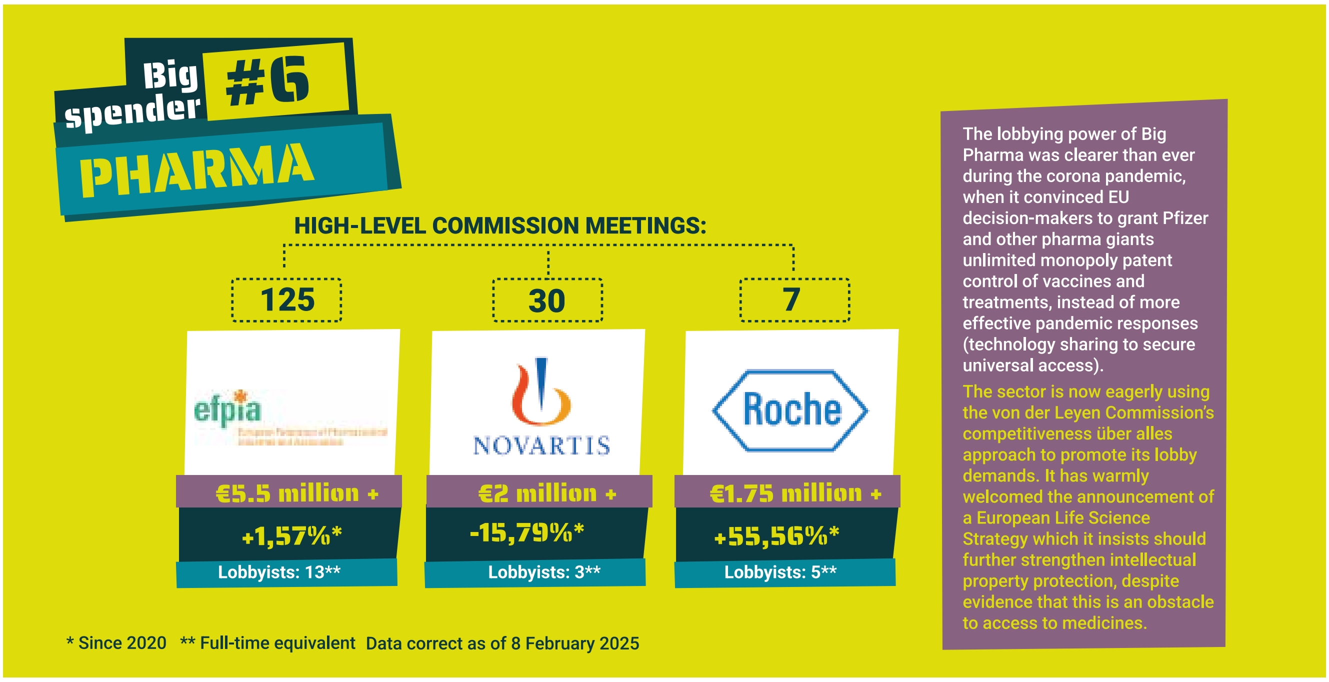
It is crucial to note that the Clean Industrial Deal is set to be heavily inspired by the Draghi report – the approximately 400 pages blueprint for the competitiveness of European enterprises. Despite early criticism, Mario Draghi prepared the report **in close cooperation with corporate lobby groups**, whereas civil society organisations had very little access to him and his associates. The Draghi report, for instance, identifies what sectors should get the most attention.

Of those declaring more than €1 million, cross-sectoral business groups have grown their EU lobby spending by 15 per cent since 2020.



f. Pharmaceuticals sector backing competitiveness agenda

The lobbying power of Big Pharma was clearer than ever during the COVID-19 pandemic, when it convinced EU decision-makers to grant **Pfizer** and other pharma giants unlimited monopoly patent control of vaccines and treatments, instead of more effective pandemic responses (technology sharing to secure universal access to them). The sector is now eagerly using the von der Leyen Commission's 'competitiveness über *alles*' approach to promote its lobby demands. It has warmly welcomed the announcement of a **European Life Science Strategy** which it insists should further strengthen intellectual property protection, despite evidence that this is an obstacle to **access to medicines**. Big Pharma celebrated the **Competitiveness Compass** and its agenda of 'simplification' of regulations (*de facto* deregulation). Of those declaring more than €1 million, this sector has raised its EU lobby spending by 25 per cent since 2020.



3. CAN WE TRUST CORPORATE INTERESTS TO DECLARE THEIR OWN LOBBY BUDGETS?

Elsewhere in this briefing we discuss the problem of over-reporting. But we are concerned that there appears to be a significant, and far more serious, problem of corporate under-reporting of lobby spend. That means that any registrant declaring under €1 million got missed off our list of top spenders, and therefore that the total lobbying budget figure of €343 million for these higher spenders is almost certainly an under-estimate. See **data sheet C** for further examples.

Take the **controversial** global food giant **Nestlé**. It declares a Brussels-based office, 8.5 full-time equivalent (FTE) lobbyists, a long list of affiliated trade associations (each of which presumably require a membership fee) and a further long list of EU files which it is working on. Yet it only declares an annual EU lobby spend of €400,000-499,999 which we consider to be an implausibly low declaration for a company with annual global sales of nearly €100 billion. A similar case could be made about **Unilever** with its €60 billion annual turnover but which only declares €400,000-499,999, despite having a Brussels office, 3 FTE lobbyists, multiple trade association affiliations, and expenditure on lobby firms of up to €250,000. Or **Yara**, the major fertiliser producer, which declares up to €999,999 annual EU lobby costs, while also declaring that it spends up to €900,000 on lobby firms alongside employing more than 6 FTE lobbyists and running a Brussels office!

Trade associations are not exempt from this plausibility problem either, and one of their primary purposes is lobbying. **FoodDrinkEurope** only declares €200,000-299,999 annual EU lobby costs, but says that its "permanent secretariat, based in Brussels, maintains close contacts with European and international institutions" and lists wide interests and influencing activities in its lobby register **declaration**. Additionally its overall turnover is €5.4 million and it spends at least €2.3 million on staffing costs, according to filings at the **National Bank of Belgium**. Similarly **Europabio**, "Europe's largest and most influential biotech industry group" only declares €100,000-199,999 annual EU lobby costs, but declares an overall turnover to the National Bank of Belgium of over €4 million. It has a Brussels office, uses a lobby firm, and has 5 European Parliament lobby passes but declares only 1 FTE lobbyist. Biotech is moving rapidly up the EU's agenda, including via the ongoing push to deregulate **new GM techniques**, and we consider this to be a further implausible lobby register declaration.

Yet another is the **European Round Table for Industry** (ERT), which describes itself as "a forum that brings together around 60 Chief Executives and Chairs of leading multinational companies of European parentage, covering a wide range of industrial and technological sectors". It says it "strives for a strong, open and competitive Europe", an agenda which it shares with the present Commission. It declares only €400,000-499,999 annual EU lobby spend even though it has had more than 150 high level meetings with the Commission in the past 10 years and is widely seen as one of the most influential lobby groups in Brussels. Last year, the ERT played a crucial **agenda-setting role** in making the EU embrace 'competitiveness' via deregulation as its primary policy objective for the coming years, at the expense of social and environmental priorities. The ERT gives no explanation for how it calculated its declared lobby spend, but it should be declaring its Brussels office and staff costs involved in EU influencing, as well as any actual or in-kind contributions from its member companies and chief executives, towards the ERT's EU influencing budget.

None of the above entities appear in our analysis of registrants declaring more than €1 million annual EU lobby expenditure because they declare less than that. But we have real doubts about their lobby declarations. These are just a handful of examples of what we consider to be a significant problem of corporate under-reporting of EU lobby spend. The rules for reporting lobby spend to the EU Lobby Transparency Register are available **here**.

THE EU'S LOBBY LEAGUE TABLE

The huge sums for EU lobbying by the biggest declaring corporate interests are clearly paying-off, considering the pro-business agenda of the second von der Leyen Commissions.

EU decision-making faces a real risk of regulatory capture, and there are next to no effective protections in place.

Corporate competitiveness is being prioritised over democratic values and social and environmental protections.

- **We need lobby firewalls to protect public decision-making.**
- **The Commission must stop providing privileged access to industry lobbies and ensure that civil society and community voices are heard.**
- **Introducing a legally-binding register is long overdue, to deliver meaningful sanctions for posting inaccurate data.**

4. HOW DID WE COLLATE THE FIGURES?

- The data used in this analysis comes from **LobbyFacts**, a joint online database project by **Corporate Europe Observatory** and **LobbyControl**. On a daily basis since 2012 LobbyFacts has been collecting the data from the **EU Lobby Transparency Register**. The LobbyFacts' archive is unique and enables comparisons in declared lobbying across periods of time.

- As explained in more detail in the methodology below, this analysis of lobby spending looked at companies and trade associations which declared more than €1 million on annual lobbying in the EU lobby register on 8 February 2025. We then looked at the same companies on the same date in 2024 and 2020. It is possible that some lobby data may have been updated since 8 February 2025.

- All figures declared to the EU lobby register are declared in bandwidths, such as €100,000-199,999 or €500,00-599,999 for example. We have used the lower figure in our analysis, unless otherwise specified, indicating that all given totals are likely to under-estimate the true picture.

- The EU Lobby Transparency Register remains voluntary; it is not legally-binding on registrants, although there are incentives in place to encourage lobbyists to join, and data quality checks in place. Nonetheless Corporate Europe Observatory and LobbyControl have long argued that the absence of effective sanctions such as fines (only possible under a legally-binding register) significantly reduces the quality of the data that registrants provide. This analysis indicates that there continues to be a significant issue of both over- and under-reporting EU lobby spend. As a result we prefer to talk about "declared" rather than actual lobby spending.

- It is important to note that the total declared EU lobby spend by the corporate sector will be far larger than that indicated by this analysis which only looks at the 162 registrants plausibly declaring €1 million or more. In 2024 LobbyControl **reported** that EU lobbyists collectively spent €1.3 billion on EU lobbying – money which is largely spent by corporations and their associations. In total the EU lobby register includes over 6000 companies and trade associations.

- Since September 2021 EU lobby registrants which consider themselves to be "non-commercial" can no longer provide a lobby budget. These non-commercial entities must instead provide a whole budget and a list of major funders. That means there are two distinct types of financial data declared within the register: lobby budgets (from companies, trade associations, etc) and whole budgets (NGOs, think-tanks). There are some entities which may have wrongly declared themselves to be non-commercial and which therefore do not declare a lobby budget. **Corporate Europe Observatory** and **LobbyControl** consider that all registrants should be required to provide the same financial information, including a lobby budget.
- Register entities are required to do at least one update per year and this should include a new set of financial data for the most recent year. There is no set date on which registrants must complete this update which means that the register data is changing all the time. As a result the EU register's declared lobby budgets are historical in that they reflect declared lobby spend from the most recent year cited, not lobby spending today.

To conduct this analysis we used the following **methodology**:

- We used LobbyFacts to produce a data sheet for all company and trade association registrants declaring an annual EU lobby spend of €1 million or more as of 8 February 2025 and the same companies on the same date in 2024 and 2020. **See data sheet D.** We did not include lobby firms and law firms – even though they almost exclusively work for business clients – to avoid any risk of double-counting. We included a handful of other registrants from other categories which we felt should be included in our analysis as they appear to represent business interests, marked in green on data sheet D.

- We categorised these major lobbyists into industrial sectors, using previous analyses by Corporate Europe Observatory and/or LobbyControl, or through individual analysis of a registrant's areas of work. A range of the registrants analysed could have fitted into 2 or more categories, but we used common sense to allocate according to the core work. For example the **European Chemical Industry Council** (CEFIC) is very active on energy matters as fossil fuels are a feedstock for many chemicals and chemical plants tend to be intensive-energy users, but logically CEFIC fits best within the chemicals category.
- As explained above, the EU Lobby Transparency Register remains voluntary and the absence of effective sanctions negatively impacts the quality of the data that registrants provide. We consider that there continues to be a significant issue of both over and under-reporting of EU lobby spending. In this analysis we removed 12 entries from our dataset (plus 1, which seemed to be wrongfully categorised as a company, detailed in **data sheet B**) as we consider them to be over-reporting their lobby spend. Unlike almost all other lobby players declaring €1 million lobby spend or more, these were not well-known actors in the Brussels bubble, and showed next to no practical engagement with the Commission or the European Parliament, which raised doubts. In one example the lobby spend related to 2021, which should not be permissible under the lobby register's rules. Others reported a massive increase in spending in just a short period with no evidence of a corresponding growth in lobbying activity, indicating that an error could have been made.
- But arguably of even more importance, we have also noted a significant concern about some likely under-reporting in the register by a number of prominent companies and or trade associations, which are known to be very active in EU affairs. Some of these are discussed in Section 3, above; others are listed in **data sheet C**. We will report our concerns about suspected under- and over-reporting to the EU Lobby Transparency Register secretariat so that they can be investigated.

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