

Lobby transparency register complaint by Corporate Europe Observatory
15 November 2017

EUTOP Brussels SPRL

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=072514125233-04>

(d) ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the Register, is complete, up-to-date and not misleading; accept that all information provided is subject to review and agree to co-operate with administrative requests for complementary information and updates;

It is our opinion that the lobby consultancy firm EUTOP has made misleading declarations. By making three separate declarations it creates confusion about its clients, and its multiple registrations mask the true scale of EUTOP's EU lobbying activity, especially where the European Parliament is concerned. Our complaint covers all three entries in the register:

EUTOP Brussels SPRL

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=072514125233-04>

EUTOP Europe GmbH

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=171298025234-65>

EUTOP Frankfurt Finance GmbH

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=067628825232-09>

EUTOP Brussels SPRL declares annual lobby costs of €2,250,000 - €2,499,999 in 2016 but only declares three clients:

- Airbus at €200,000 - €299,999
- British American Tobacco at €400,000 - €499,999
- EUTOP Europe at €1,000,000 or more

While the revenue generated by these clients' is listed in ranges, it is not clear how the total of €2,250,000 - €2,499,999 is reached. This begs the question: are clients missing from this declaration? Its registration states: "EUTOP accompanies its clients in all EU policy areas including inter alia but not limited to Digital Single Market, Financial Services and Capital Markets Union, Competition Policy; Climate Action & Energy Union; Agriculture Policy, Consumer Policy; Transport Policy, Environment Policy, Internal Market, Employment Policy, Health & Food Safety, Trade Policy or Budget & Human Resources" which implies that it has clients working on a range of different issues to those listed. We further note that EUTOP Brussels SPRL benefits from 12 European Parliament lobby badges.

EUTOP Europe GmbH, which confusingly is listed as a client of EUTOP Brussels SPRL, itself declares numerous clients, but the relationship between these clients and the rest of EUTOP is not at all clear. For example, is the €1,000,000 plus that EUTOP Brussels SPRL declares as receiving from EUTOP Europe connected to the clients which EUTOP Europe declares in its own entry? We note that EUTOP Europe benefits from no fewer than 9 European Parliament lobby badges.

The third EUTOP entry in the register is that of EUTOP Frankfurt Finance GmbH which lists €300,000 - €399,999 annual lobby expenditure for 2016 and two European Parliament lobby badges. Its register entry also states: "EUTOP accompanies its clients in EU policy areas such as - but not limited to - Financial Services and Capital Markets Union, Competition Policy or Consumer Policy." It declares only one client, EUTOP Europe at €400,000 - €499,999. Again, what is the connection between this declaration and EUTOP Europe's clients?

The transparency register guidelines makes clear that the "single entry principle" should apply in these kinds of cases. The differences between EUTOP Brussels SPRL, EUTOP Europe GmbH, and EUTOP Frankfurt Finance GmbH are far from clear and the website addresses provided are identical. By listing different offices separately and also as clients of each other, it confuses and misleads.

We consider that all three EUTOP entries are deeply confusing and misleading and we consider that these are very serious breaches of the EU lobby register rules. We further note that EUTOP was very slow to join the register, considering it was a lobby consultancy working on EU affairs for many years. EUTOP should make one entry only, and it should precisely and accurately list all lobby clients for which work is conducted at the EU level, and explain the relationship between its different offices.

Was any harm caused to the complainant?: No

Was the non-compliance intentional?: I don't know. It is hard to assess intention. As it is a relative newcomer to the lobby register, it may be that EUTOP simply has not correctly followed the implementation guidelines, particularly as it relates to financial reporting and clients. But lobby consultancies such as EUTOP should make particular efforts to ensure that they are as transparent and clear in their registration as possible and this is not currently the case.