

## Unregistered activity

According to the rules of the register, any organisation “engaging in activities that are covered by the Register, must register under its own name. It cannot claim to be registered indirectly just because it is affiliated to a registered organisation. Such affiliations should also be declared in the Register.”

Corporate Europe Observatory (CEO) considers that the Glyphosate Task Force (GTF), which is listed as a client in Hume Brophy’s EU Transparency entry, should be registered in its own right. According to Hume Brophy’s latest entry, the GTF generated a turnover for the lobby firm of at least 100,000€ in 2016.

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=3843982938-44>

On its website (<http://www.glyphosate.eu/legal-notice>), the GTF states that: “The Glyphosate Information Portal is an initiative of the European Glyphosate Task Force (GTF), a consortium of companies joining resources and efforts in order to renew the European glyphosate registration with a joint submission.”

This mission statement indicates that the work of the GTF falls squarely within the scope of the EU Transparency Register. Moreover, seeing that the glyphosate renewal process is one of the most hotly contested EU decisions in recent times, full lobby transparency by all relevant lobby actors is of particular importance.

Corporate Europe Observatory further notes that according to its website (<http://www.glyphosate.eu/legal-notice>), the GTF has a total of 22 members, some of which are registered, others not:

ADAMA Agan Ltd. -

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=197830122389-52>

Agria S.A. - Not registered

Agro Trade GmbH – Not registered

Albaugh UK Limited – Not registered

Arysta Lifesciences SAS- Not registered

Barclay Chemicals (Manufacturing) Ltd -

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=085121325423-90>

Brokden SL – Not registered

BROS Spółka z ograniczoną odpowiedzialnością spółka komandytowa – Not registered

Cheminova A/S – Not registered

Coromandel International Ltd – Not registered

EXCEL CROP CARE(Europe) NV – Not registered

Helm AG – Not registered

Industrias Afrasa S.A. - Not registered

Monsanto Europe S.A./N.V. -

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=678841411135-35>

Nufarm GmbH & Co KG – Not registered

Rotam Agrochemical Europe Limited – Not registered

Sapex Agro S.A. - Not registered

Sinon Corporation – Not registered

Société Financière de Pontarlier – Not registered

Syngenta Limited - <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=16822412339-79>

United Phosphorus Ltd – Not registered

Wynca UK Limited – Not registered

Of the ones that are registered, none have mentioned their membership of the GTF.

CEO knows that the GTF has previously worked as a lobby vehicle for its members. For instance, in 2016 a Monsanto lobbyist wrote to Commissioner Andriukaitis referring to himself as Chair of the Board of the GTF (a separate complaint about Monsanto has been submitted by CEO, which refers to the company's failure to declare its relationship with the GTF).

[https://ec.europa.eu/commission/sites/cwt/files/letter\\_1.pdf](https://ec.europa.eu/commission/sites/cwt/files/letter_1.pdf)

To sum up:

- The GTF should be registered in the EU Transparency Register as its work clearly falls within the register's scope. Simply being mentioned as a client of Hume Brophy's is inefficient and does not serve the purposes of the register.
- The GTF should clarify the activities it provides to its members and declare the names of the individuals who conduct lobbying on its behalf.
- The members of the GTF whose work falls within the scope of the register should declare their relationship with this organisation, and take its activities into account when calculating their own EU lobby expenditure.