

Corporate Europe Observatory has two main concerns regarding Monsanto's entry in the EU Transparency Register:

1. Monsanto is clearly and substantially underreporting the amount of money it spends on activities covered by the register;
2. Monsanto's entry fails to list the organisations that represent its interests.

1- In its latest entry (5/04/2017) Monsanto declared it spent less than 400,000 Euros in activities covered by the register.

This amount seems to be a wild underestimate of its actual lobby spending, as we know from other entries in the EU Transparency Register that Monsanto hires four lobby consultancies, paying them a total of at least 910,000 Euros per year - if only the lowest figures declared are taken into consideration.

The consultancies that list Monsanto in their most up-to-date entries as a client are:

- Hume Brophy, 100,000-199,999
- Interel European Affairs, 10,000-24,999 €
- Fleishman Hillard, 700,000-799,999 €
- Red Flag, 100,000-199,999 €

To these amounts we must add the membership fees that Monsanto pays to four registered organisations which defend the interests of its members:

- European Seed Association
- European Crop Protection Association
- EuropaBio
- European Bio-stimulants Industry Council

Research from CEO (attached) has also shown that Monsanto's interests in the EU are further represented by organisations that are not even registered. One seems to be particularly active in influencing the EU Institutions is the Glyphosate Task Force (a separate alert will be submitted for this organisation), run by Hume Brophy .

Monsanto is also a member of the International Life Science Institute (ILSI) Europe (<http://ilsieurope.org/>), headquartered in Brussels. ILSI's stated purpose is to foster "collaboration among the best scientists from industry, academia and the public sector". Many of its projects are directed at the European Commission and, as such, fall squarely within the remit of the register.

It is fair to conclude that Monsanto's lobby spending is much higher than the amount the company has declared, especially when considering that in the US, where reporting requirements are much stricter than in the EU, Monsanto declared spending \$4,600,000 in 2016 lobbying Washington decision-makers (<https://www.opensecrets.org/lobby/clientsum.php?id=D000000055&year=2016>). The regulatory impact of EU policy-making to Monsanto is comparable to its goals in Washington, so it is reasonable to assume that its true EU lobby spending would be much closer to the US figure.

2) Monsanto's entry is faulty because it does not list the intermediaries working on its behalf, including the above-listed lobby firms. In addition, the company only discloses a partial list of membership organisations which lobby on its behalf.

Monsanto not only declares a lobby spend that is rather modest for a company of its size, it also only declares two lobbyists (1.75 FTE).

This can only be explained by the fact that much of its activities are conducted via intermediaries like lobby firms, and the membership organisations, trade associations and similar platforms which Monsanto is part of.

One case evidently exemplifying this is that of the Glyphosate Task Force (GTF), of which Monsanto is a member and which is run by Hume Brophy. Nevertheless, the GTF itself is not registered and Monsanto does not list its relationship with the organisation.

In fact, the GTF is a rather opaque structure but documents released to CEO (https://ec.europa.eu/commission/sites/cwt/files/letter_1.pdf) show that the GTF actively seeks to influence EU institutions on behalf of Monsanto, as illustrated by a letter addressed to Commissioner Andriukaitis from the GTF, signed by Monsanto lobbyist Dr Richard P. Garret. Yet, the GTF is not registered, and Monsanto does not reveal the connection in its own entry.

Monsanto apparently does not disclose all of its lobbying activities and appears to be represented by organisations that avoid lobby transparency rules.