

## **Complaint on MSL Brussels - Division of MMS Communications Belgium SA**

### **Details of non-compliance with the above code**

CEO is concerned that MSL's entry hides the true identity of clients and it seems to be seriously under-reporting the turnover generated by this client.

#### **- Clause a - hiding the true identity of clients**

MSLGroup Brussels entry in the EUTR lists two of its sister companies (Qorvis and CNC UK) as clients. CEO has strong reason to believe that by listing the clients this way, MSL is hiding the true identity of the entities that actually benefit from its lobbying services.

This is particularly clear in the case of Qorvis. This US public affairs company was acquired in 2014 by Publicis, the same public affairs group that owns MSL and CNC. At that time, Qorvis published a press release that stated that:

“Qorvis clients can now access MSLGROUP experts in nine practice areas and more than 20 specialties from around the world. And this access is through a single point of service.”(<https://www.qorvis.com/news/262> )

An anonymous source has now told CEO that from late 2015 onwards, MSL was subcontracted by Qorvis to lobby the EU Institutions on behalf of the Mission of the Kingdom of Saudi Arabia to the EU. According to Lobbyfacts, this matches the time when MSL started declaring Qorvis as a lobby client (<https://lobbyfacts.eu/representative/f130b89745dc465d94e8e8fdc027e1ee/msl-brussels-division-of-mms-communications-belgium-sa> )

The work that MSL is supposedly conducting on behalf of the Saudi Mission to the EU, falls squarely within the remit of the EUTR. Namely, the lobby firm conveyed the country's key lobbying positions to EU institutions and the media by running the Mission's website and twitter accounts, directly lobbying MEPS and setting out to organise trips for Saudi parliamentarians to the European Parliament. MSL was also in charge of writing and sending a monthly newsletter to a long list of stakeholders in the European Parliament, Commission and the European External Action Service .

According to our source, MSL was in direct contact with the Kingdom of Saudi Arabia's Mission to the EU. However, Saudi Arabia is not listed as a client. Instead, we find a mention to its sister company, Qorvis which is known to be Saudi Arabia's highest paid lobbying firm in Washington ([https://efile.fara.gov/pls/apex/f?p=171:200:5954851321527::NO:RP,200:P200\\_REG\\_NUMBER:5483](https://efile.fara.gov/pls/apex/f?p=171:200:5954851321527::NO:RP,200:P200_REG_NUMBER:5483) )

The contract appears to have been severed by the client sometime in the second half of 2017.

By listing their sister company instead of the actual client, MSL breaks clause a) which demands that registrants identify the « entity or entities they work for or represent (...) specify the clients or members whom they represent ».

This is one of the pillars of the EUTR and it is explicitly told to registrants in the implementation guidelines, that clients are to be defined as "The party to which relevant professional services are provided. "

We also note that MSL's entry lists another sister company as a client, in this case, CNC UK. CEO does not know who the final clients are in this agreement.

#### **Clause d - misleading reporting of the client revenue**

MSL also appear to have seriously under-reported the value of the contract in question. They report

the Qorvis contract as worth €50,000-€99,000 annually. Our source indicates that the contract was worth approximately €110,000 a month, so around €1,320,000 annually.

In contrast, MSL reports its entire lobbying budget for 2017, when the contract was still active, as €600,000 € - 699,999, so around half of the entire actual worth of the Saudi Arabian contract. And it reported its lobbying budget for 2016, when we know the contract was in place for the entire year, at an even lower €400,000€ - €499,999.(

<https://lobbyfacts.eu/representative/f130b89745dc465d94e8e8fdc027e1ee/msl-brussels-division-of-mms-communications-belgium-sa> )

The Secretariat should clarify who is the ultimate benefactor of the lobbying activities and demand that MSL does not use subcontracting to hide the identity of its clients. It should also ensure that MSL is accurately declaring the client revenue.

**Was any harm caused to the complainant ? No**

**Was the non-compliance intentional ? Yes**

Intent is always hard to establish. However, the rules of Transparency Register and implementation guidelines are very clear that clients are to be defined as « The party to which relevant professional services are provided. » It is thus hard to believe they have done so out of ignorance of the rules.

Given the controversial nature of the client in question and the fact that the identity of clients is to be listed is such a well known basis of the Transparency Register, it is indeed hard to believe that MSL, an active lobby firm, was non-intentional in its actions.