

The strange case of the shy lobbyists: why no-one will admit to lobbying for TTIP

It is a strange fact, but if you believe the pronouncements of PR and law firms in Brussels and the rest of the EU, almost none of them are lobbying on one of the biggest issues of the day, the prospective EU-US free trade agreement Transatlantic Trade and Investment Partnership or TTIP.

A naive observer might wonder why all these lobbyists and lawyers would miss out on what must be some of the most lucrative contracts around: pushing corporate interests in the TTIP negotiations, while selling the controversial trade deal to an increasingly concerned public.

In reality, this shyness to declare pro-TTIP lobbying is highly unlikely to reflect the real situation, given that private interest groups overwhelmingly dominated the European Commission's TTIP consultations: 9 out of 10 lobby contacts during the preparatory phase of the negotiations were with companies and corporate lobby groups (see [here](#) and [here](#)). It's clear from these figures that *someone* certainly is lobbying heavily for TTIP, but who?

In summer 2014 CEO undertook a survey to try and establish which law firms and lobby consultancies were willing to be transparent about their lobbying on TTIP. The shyness over disclosure was notable: no law firms admitted to doing any lobbying on TTIP at all. Overall, 66 per cent of lobbyists and law firms CEO contacted refused to say whether they were lobbying on TTIP and 88 per cent refused to say who they were lobbying on behalf of. (See [Appendix](#) for CEO's detailed survey of law and lobby firms on the issue.)

The fact that the prospective EU-US free trade agreement is only growing in controversy may be a large reason why lobbyists continue to be so reluctant to talk.

Take the case of Kreab Gavin Anderson, one of Europe's largest PR firms, which told CEO last year that it was not “much” involved in actual lobbying or influencing on the subject of TTIP. Kreab moves in the elevated [circles of multinational lobbying groups](#), such as the Transatlantic Business Council (TABC), an extremely powerful group which includes chief executives of the US and EU's biggest corporations, and which has had a [huge input into TTIP negotiations](#). Moreover, Kreab is itself in [the list of “stakeholders”](#) who met with the European Commission's DG Trade when TTIP negotiations were being prepared.

And when it recently updated its entry in the EU's transparency lobby register which [asks](#) lobbyists to “list the most recent EU initiatives, policies and legislative files monitored by your organisation, currently and/or over the past year”, Kreab did not declare that it is lobbying on TTIP. Neither did Kreab mention in its [entry](#) that it is involved with the [Alliance for Responsible Commerce](#) (ARC), a group that is extremely vocal in promoting TTIP. This is despite the fact that as CEO discovered,

ARC was set up by the PR firm in December 2014. Kreab only mentions that it works for the Confederation of Swedish Enterprises (CSE) with 2014 revenue of €50,000 - €99,999; ARC is an initiative of CSE.

Disseminated with Kreab's PR help, ARC's message to Europe's small and medium sized enterprises (SMEs) is that TTIP will help them expand trade. Small and medium sized enterprises (SMEs) are among those concerned that the deregulation TTIP entails will mean a concentration of market power for the largest corporations who can dominate the field. Not surprisingly, then, lobbyists for large corporations – those who are set to benefit most from the agreement – are pushing the notion that TTIP will benefit SMEs.

[ARC claims](#), for example, that "SMEs are at the heart of Transatlantic Trade", arguing:

99% of European businesses are SMEs. These 20 million enterprises share a strong tradition of entrepreneurship with their 28 million counterparts in the US. A level playing field for transatlantic competition amongst SMEs will further drive local, highly-skilled job creation and technological innovations in industries of the future that will benefit citizens in both regions.

The kinds of arguments ARC makes are designed to respond to concerns like those raised by the UK's news portal [SME Insider](#), which says: "Since tariff rates between the US and the EU are, at around 3%, already extremely low, it's not actually trade arrangements that would be targeted by the new rules. Instead, it is regulations, most of which have been put in place to protect people, the environment and – yes – small business, and most of which are in the EU." Meanwhile Germany's SME association *Verband mittelständischer Unternehmen* is also increasingly concerned about TTIP with less than [one out of six feeling it will benefit them](#).

Former European Commission trade official Pierre Defraigne also rang alarm bells recently, [warning](#) that "We will not... want to see, the mass of SMEs that are going to suffer [from TTIP]." The corporate sector, too, seems to be aware that "the 19 million European SMEs which do not export... will face increased competition" from TTIP as the French employers' federation MEDEF put it in a meeting behind closed doors with the European Commission on 26 March 2015, according to [minutes](#) released to CEO via an access to information request. MEDEF also asked "how the (Commission's) communication services can reassure" the SMEs.

In this context, the Alliance for Responsible Commerce and its SME-focused propaganda are gaining prominence in TTIP debates, yet it was only with some digging by CEO, followed by direct questioning of Kreab, that we were able to confirm that its website was set up by the PR firm.

ARC was set up by the Confederation of Swedish Enterprise (CSE), which is a Swedish employers' organisation known for its pro-free trade views. CSE also funds

the European Centre for International Political Economy (ECIPE), an ultra-neoliberal think tank based in Brussels. CSE makes a big claim on its website to promote the views of SMEs, despite the fact that almost all the biggest Swedish multinational corporations are members with a powerful voice within the organisation. It has been [leading the way with the argument that TTIP is good for SMEs](#), including via ARC.

CSE is also a member of BusinessEurope, the most powerful corporate lobby group in Europe and a moving force behind TTIP. BusinessEurope also endorses the Alliance for Responsible Commerce, according to the [ARC website](#). Interestingly, videos promoting TTIP on the ARC website are [made directly](#) by the American Chamber of Commerce (AmCham) in Sweden, needless to say an organisation that exists to promote US business interests.¹

Thus, despite the fact that ARC claims to "encourage understanding of the issues [on TTIP] within a rational and non- emotive debate", it is clearly set up as a lobbying tool with a certain big business agenda in mind.

The connection with the PR firm Kreab Gavin Anderson was initially discovered from the HTML source code of the ARC's website where the URL euarcus.com appears. A WHOIS search for euarcus.com shows it was registered by an Artur Leczycki, who works for Kreab Gavin Anderson in Stockholm; his profile says his expertise is in "reputation management" and "opinion building".

When asked outright again in April 2015, Karl Isaksson, Managing Partner of Kreab Gavin Anderson said that while "several of our clients are still interested in following TTIP developments", he said Kreab is "not involved in lobby activities as such" on the trade deal. However, he did confirm that, "We assist the Confederation of Swedish Enterprise with their social media information on @euarcus [ie Twitter] and www.arc.trade/en [the ARC website]."

Given that we are seeing new corporate lobbying offensives such as that of the Association for Responsible Commerce, it seems particularly important to have better lobby transparency in place and for the requirements for reporting to be enforced.

The fact that in Kreab's newly updated information in the [transparency register](#), TTIP is simply not mentioned is in contrast to the specific new EU Transparency Register guidelines in place since 27 January 2015, which require registrants to: "List the most recent EU initiatives, policies and legislative files monitored by your organisation, currently and/or over the past year." TTIP lobbying clearly should be listed under these rules. (However, bizarrely the guidelines also go on to say: "Be as specific as possible but list only the top 5 or maximum 10 initiatives, policies or legislative files your organisation is active on." For a lobby consultancy, law firm or multinational with fingers in many pies or interests in many dossiers, this is a ridiculous loophole which potentially allows TTIP lobbyists to get away with not mentioning it at all.)

¹ Kreab is both a member of AmCham Sweden, and Johan Hallsensius of Kreab is on the board of AmCham Sweden's [media working group](#) to promote US company positioning in the Swedish media.

What Kreab declares in the section entitled 'Specific activities' is that it follows "most of what is going on in Brussels and the EU", including "Trade policy". Under the section entitled, 'Relevant policy implementation, public relations and communication activities' Kreab declares vaguely, "As a large consultancy we arrange a large number of events, both on behalf of our clients and in our own name." This sentence imparts no real information of use.

This is in clear contradiction to what Karl Isaksson, Managing Partner of Kreab Gavin Anderson, told CEO in 2014 before the new disclosure rules were in place: "If the rules in a mandatory system demand more detailed disclosure of our activities, we'd be happy to abide by them. However, as the system is designed for the moment, we do not discuss openly in detail what we do for different clients."

This means that many firms that appear to be abiding by the register rules are in fact being extremely vague or ignoring entirely the requirement that they disclose on which issues they are lobbying for their clients. In addition the information on clients themselves can be very outdated. Contrast all this to the situation in the US where all current lobby contracts with clients need to be disclosed, including precise information about which issues are being lobbied on, on a per client basis. As long as the EU does not strengthen and enforce transparency rules for lobbyists to provide more detailed information about the topics they are lobbying on, their activities – including on the biggest trade deal of our time – will continue to fall under the radar.

Kreab is not alone in its shyness when it comes to revealing details of TTIP lobbying; indeed, it is far from the worst offender in this regard. For example FTI Consulting told CEO in 2014 that they were not willing to take part in the survey, that they complied with European Public Affairs Consultancies' Association (EPACA) rules which include those on transparency, and that they had no further comment. A piece in the Washington-based lobbying newspaper [The Hill reported](#) in 2013 that US firms were gaining European outposts – including C2 Group which was gaining a Brussels base by joining with FTI Consultancy – to lobby on both sides of the Atlantic over TTIP.

Similarly, lobby giant Fleishman Hillard told CEO in summer 2014 that they were not currently lobbying (nor assisting with lobbying) on TTIP on behalf of any of its clients but "following developments closely". Information obtained by CEO under the right of access to documents shows that Fleishman-Hillard and its client Eli Lilly did however have a meeting with DG Trade in March 2013. The subject under discussion was TTIP, and the EU-Canada trade deal CETA. Without enhanced lobby transparency it is not possible to know if this was a one-off meeting or not, or whether Fleishman Hillard's TTIP lobbying continued.

While in summer 2014 not a single law firm would admit to CEO to lobbying for TTIP, there is [strong evidence](#) that they are in fact actively pushing for the inclusion of the highly controversial Investor-State Dispute Settlement (ISDS) in the deal. ISDS

is a dangerous tool that could empower transnational corporations to sue governments at private international tribunals, and is [big business](#) for international law firms. In July 2014, a coalition of law firms and companies which have sued states before set up a lobby group in Brussels, European Federation for Investment Law and Arbitration ([EFILA](#)), to mount a fierce pro-ISDS lobbying campaign. They aim to “promote the benefits of investor-state arbitration and influence EU policy on investment protection”, acting as the “ ‘main voice’ of users of investment arbitration at the EU level”. In its [contribution](#) to the European Commission’s public consultation on investment arbitration in TTIP, EFILA argued for very far-reaching rights for foreign investors under TTIP.

Law firm Mannheimer Swartling, an EFILA member, said in summer 2014 that it was not lobbying on TTIP; Herbert Smith Freehills, Linklaters, Luther, Shearman & Sterling, and White & Case did not take the time to reply. Nonetheless, all these firms were in the draft programme of [EFILA’s inaugural conference](#) on 23 January 2015. There, they discussed EU investment treaties and various investment settlement dispute regimes with European Commission officials leading on the issue, as well as key MEPs from the Parliament’s trade committee.

And while Alber & Geiger, the lobbying law firm, told CEO in mid-2014 they were not at the time lobbying for TTIP, they have certainly been very actively offering their lobby support services on TTIP to US companies interested in accessing EU market in critical sectors such as food. In a March 2013 piece for [The Hill](#), the firm’s Managing Partner Andreas Geiger wrote, “effective lobbying campaigns in the EU capital should be paramount for all American firms if they want to maximize the benefits from the talks” and recommended that “US companies should seek professional lobbying services, and especially lobby firms that understand the politics, process and rules of engagement in Brussels.” Firms, for example, such as Alber & Geiger.

TTIP is hugely controversial: the lobbyists themselves are very secretive, and fiercely protecting valuable contracts from publicity-shy clients. Which begs the question: if TTIP is such a boon to Europe, why will almost no-one admit to lobbying for it?

Recommendations:

Corporate Europe Observatory calls for a radical improvement of the transparency register, as part of Juncker's promise to ensure greater transparency on lobbying activities in the EU.

1. The register should be made legally-binding.
2. All EU lobbying actors, including law firms that carry out lobby work, should provide detailed information about their work, including:
 - which dossiers they have worked on,
 - for which clients,
 - far more precise spending on such activities.
3. The rule that recent lobby clients should be listed should be firmly enforced.

4. All registrants should be required to specify *all* of the legislative proposals, negotiations or issues they lobby on, and not just the top 5 or 10.
5. For law firms and lobby consultancies this should apply per client, including on TTIP.
6. Registrants should also update their entry at least every six months.
7. The authorities must be proactive in their monitoring of the data and stricter monitoring and enforcement mechanisms are needed to avoid under-reporting of financial data or entries which provide obsolete information.

These steps are necessary to ensure greater transparency around lobbying in the EU.

Appendix: CEO's survey of Brussels-based lobby consultancies and law firms on TTIP lobbying

The EU's voluntary lobby transparency register seriously fails to shed light on who is lobbying on the transatlantic trade deal TTIP – and a survey conducted by CEO in 2014 showed widespread unwillingness by Brussels-based lobby consultancies and law firms to answer questions about their TTIP lobbying for industry clients.

- In summer 2014 CEO surveyed 82 lobby consultancies and law firms in total.
- 66 per cent refused to say whether they were lobbying for TTIP.
- 88 per cent refused to disclose any client details.
- Law firms were most reluctant to reply: out of 33 contacted, only 7 responded to our questionnaire (21.2 percent).
- Not a single law firm admitted to lobbying on TTIP.
- Out of the lobby consultancies surveyed, 46.9 percent did not reply at all.
- 11 lobby consultancies said they were working on TTIP; all but 3 of these said they were only monitoring developments.
- Almost none of the consultancies which provided substantial replies answered the question for whom they were lobbying on TTIP (88.8 percent).

In our view, lobby consultancies and law firms should provide detailed information about which dossiers they have worked on and for which clients, including on TTIP. Unfortunately this is not currently the case. For example since the time this survey took place, in January 2015 new reporting requirements for greater detail in the EU's transparency register were made, asking registrants to "List the most recent EU initiatives, policies and legislative files monitored by your organisation, currently and/or over the past year" (albeit with the qualification that they should only list "the top 5 or maximum 10 initiatives, policies or legislative files your organisation is active on"). Yet hardly any lobbyists have listed TTIP.¹ The current rules need far better monitoring and enforcing; but they also need a substantial upgrade to ensure meaningful transparency around lobbying in the EU. (See CEO partner ALTER-EU's

new [Full lobby transparency now!](#) campaign.)

In summer 2014, CEO found little to no information on consultancies and law firms lobbying to promote their clients' interests in the TTIP negotiations in the transparency register. At the time of the survey, only 50 firms and organisations on the transparency register mentioned TTIP in the description of the activities undertaken in their previous year of operations. Moreover, a large number of these organisations were in fact from civil society and campaigning against TTIP.ⁱⁱ

These results clearly significantly under-played the total amount of lobbying happening on TTIP and even now, several months later, the lobby register still provides almost no accurate overview of the dynamics and actors of the TTIP lobbying machine. Moreover, it shows that many civil society organisations are reporting TTIP activity but there is almost complete silence coming from corporate lobbyists – despite the fact that, [as stated above, nine out of ten lobbying contacts](#) with the Commission in preparing for the negotiations were from industry and their lobbyists.

Why the register is silent on TTIP lobbying

There are several reasons for a lack of reporting on TTIP lobbying. The overwhelming majority of law firms which carry out lobby work, including on TTIP, are *de facto* boycotting the EU's transparency register, either by not registering at all, or by not disclosing their clients, hiding behind the excuse of 'client confidentiality'. In reality this applies only to legal representation but should not be applied to lobby work.ⁱⁱⁱ

Even if lobbyists do report their activities, it is theoretically possible that TTIP still may not feature within an organisation's top five or 10 target dossiers. Furthermore, the lack of enforcement of the current rules allows registrants to provide overly generic descriptions that fail to give an adequate picture of the nature of their lobbying. To take just one example, instead of listing the specific legislative dossiers it works on, Edelman lobby consultancy describes its activities as “public affairs and strategic communications services in a wide range of sectors including energy and climate change, environment, transport, ICT, agriculture, food, health-care and financial services”. Many other registrants provide information in similarly broad terms.

The refusal of these lobby actors to be open about their lobby work, and the absence of adequate EU lobby transparency rules and enforcement mechanisms to require them to be fully open, means that corporate lobbying on TTIP can be opaque, secretive, and occur away from public scrutiny. This is at odds with the corporate discourse about ethical and transparent lobbying, for example from the European Public Affairs Consultancies Association, [EPACA](#).

The survey

Due to the lobby register's silence on TTIP lobbying, CEO directly approached the lobby consultancies and law firms about their lobby activities on the proposed trade and investment deal. During the first week of July 2014 a questionnaire on their current and past lobbying work on this major trade agreement was sent to 49 consultancies and 33 law firms in Brussels. The 82 companies included all EPACA members, and the top 50 firms for lobbying turnover according to the [LobbyFacts database](#). (This [new online tool](#) from CEO, based on the information in the EU lobby register, allows the data to be sorted, compared, ranked, and analysed in ways not possible via the official register.) Among the 34 law firms, only Alber & Geiger and Linklaters were registered before July 2014 (the date of the questionnaire). The list of law firms contacted also includes all members of the European Federation for Investment Law and Arbitration (EFILA), a lobby group recently set up in Brussels to mount a fierce lobbying campaign for far-reaching rights for foreign investors in trade agreements such as TTIP.

The questionnaire addressed to consultancies inquired into previous and current lobbying activities on TTIP for any of the clients they declared they have worked for in a given period of time. In the absence of fixed reporting deadlines, the period varied according to when consultancies last updated their entries. The only register requirement was to update once per year: this could happen anytime in the year the consultancy chose. At the time of the survey, some others provided [financial data from 2011](#) and 2012, and some even included financial data only covering a four- or six-month period. For those outside of the register, including most of the law firms, the questionnaire asked whether they had undertaken lobbying activities as defined in the transparency register. A reminder to encourage companies to take part in the survey was sent out in the first week of August. One month later, those who had not replied to the emails were contacted by phone and asked to give a positive or a negative answer to our request for information.

We received 26 replies from the 49 lobby consultancies contacted (55.1 percent), as well as 7 replies from law firms from a total number of 33 contacted (21.2 percent). In total, 66.3 percent of the firms contacted refused to say if they were working on TTIP or not. In addition, of the substantial replies by consultancies almost none actually answered the question of who the consultancies and law firms were lobbying on behalf of. (88.8 percent).

Despite our repeated requests, 23 consultancies did not respond to our survey, despite the fact that at the time of questioning, 12 were members of [EPACA](#), an organisation that trumpets full commitment to transparency.

Fourteen lobby consultancies responded that they were not involved and had never been involved in lobbying in the past in relation to TTIP. No further explanations nor comments were made, for instance, in relation to activities such as whether these companies at least engaged in information gathering on TTIP for clients. While the definition of lobbying in the EU transparency register, which is called 'interest representation', is quite comprehensive,^{iv} information gathering and monitoring are

not covered. However, these obviously could be seen as activities which, if carried out by lobby consultancies, could help their clients to carry out their own lobbying.

A further nine consultancies were willing to share comments or details of their TTIP activities which did include monitoring, information gathering, or promoting market access. Two of them explicitly stated the clients for whom they were working on TTIP. Another consultancy provided the name of a company for which it had extensively monitored TTIP developments in the past. Three additional consultancies had no comments to share with us and said that it was sufficient for them to comply with the requirements of EPACA Code of Conduct.

TTIP: a highly interesting issue for corporate clients

It is notable that only two consultancies – see below – were open about the clients and specific issues they were at that moment lobbying for over TTIP. And these two were in fact working on issues one might consider as against the full pro-free trade agenda of TTIP, namely defending French dairy and the naming of local food products from France and Italy in the case of Insight, and in the case of Europe Analytica, for the exclusion of the cultural sector from the TTIP talks.

Lobby consultancy, [Insight Consulting](#), told CEO that they were fully involved in the current TTIP negotiations on behalf of [all their clients](#). Their work involved regular monitoring and information gathering as well as direct assistance in lobbying for producers of agricultural products and foodstuffs, such as the French dairy industry and several Consortia of Protected Geographical Indications (GIS) from Italy and France.

The lobby consultancy [Europe Analytica](#) responded that it had extensively lobbied for the exclusion of the cultural sector from the TTIP negotiations on behalf of the European Coordination of Independent Producers, the International Federation of Film Distributors' Associations and the European Publishers Council. The consultancy had supported and coordinated its clients in the elaboration and running of the collective campaign advocating for the “cultural exception”, aiming at protecting Europe’s cultural and creative diversity. To date, this is one of the few sectors which is at least partly excluded from the negotiations.

[Hanover Communications](#), a lobby consultancy with offices in London and Brussels, was the third firm to be fully transparent about its TTIP lobbying, over a past client. Unusually, it mentioned TTIP in its registry entry as one of the initiatives covered by its activities. Hanover Brussels told us that it had extensively monitored developments for Siemens and regularly updated the company on the state of discussions. Its TTIP-related work for the multinational company did not involve providing strategic advice or any other support of lobbying activities. They also informed us that Siemens is not their client anymore. In January 2015, [LobbyFacts recorded Siemens](#) as one of the biggest lobby players in the EU.

The lobbying giant [Burson Marsteller](#), replied that it was monitoring developments in TTIP negotiations as well as promoting market access for an unspecified client. According to David Earnshaw, Burson Marsteller Executive Officer of the Brussels, office the “antiglobalisers”, CEO and the “green’ lobby” are the most powerful lobbying actors in relation to the TTIP talks. This flies in the face of the facts. In the preparatory face of the negotiations, DG Trade's encounters with public interest groups only accounted for 4 percent of all consultations, stakeholder debates and behind-closed-doors meetings, while [92 percent were with business lobbyists](#).

The silence of the law firms

In keeping with the general opposition of law firms to the transparency register, of the 33 law firms we contacted, only Alber & Geiger and Linklaters were registered before July 2014 when we started our research. However, law firms are explicitly included in the list of organisations expected to register if they lobby in the EU.^v

Alber & Geiger, Freshfields, and Mannheimer Swartling replied that their past and current activities for any of their clients did not involve lobbying work on TTIP. Clifford Chance, Akin Gump, Van Bael & Bellis, and Cleary Gottlieb replied but refused to provide any answers to our survey.

According to the (very few) replies from the survey and the information available on the lobby register, there was no law firm which admitted to doing any lobbying on TTIP in summer 2014, including members of EFILA ([see above](#)).

Conclusion

This survey illustrates that the transparency register is a virtually useless tool if one wants to know who is lobbying in the EU on an issue of paramount importance like the proposed transatlantic trade deal. We know from other evidence sources that a lot of lobbying is going on, but the register did not tell us much at the time of the survey, and despite the commitment of Commission President Juncker to reform it, it still doesn't. When contacted to respond to a simple questionnaire about their lobbying activities on an issue of major concern such as TTIP, most lobby firms refused to disclose details of the specific work for their clients, implying that voluntary transparency rules are not effective.

Transparency can clean up unethical/unscrupulous lobbying. This is vital as TTIP is being negotiated on our behalf, will be irreversible, and could have profound impact on the environment, jobs and food security in Europe and beyond. The time is ripe for real lobby transparency.

Table 1: TTIP lobbying questionnaire results, September 2014

	Consultancy	EPACA membership	Disclosing TTIP lobbying in Register?	Replied to survey?	Admitted TTIP lobbying?
1	Europe Analytica	member	No	Yes	Yes. Clients: European Coordination of Independent Producers, the International Federation of Film Distributors' Associations and the European Publishers Council.
2	Insight Consulting	member	No	Yes	Yes. French dairy industry and several Consortia of Protected Geographical Indications (Gis) from Italy and France
3	Hanover Communications	member	Yes	Yes	Yes. Monitored developments for Siemens and regularly updated the company on the state of discussions
4	EUK Consulting	member	No	Partial response	Yes. Monitoring and providing intelligence gathering for unspecified clients
5	Interel European Affairs	member charter	No	Partial response	Yes. Monitoring and providing intelligence gathering for unspecified clients
6	Fleishman Hillard	member charter	No	Partial response	Yes. "following developments closely"
7	Burson Marsteller	member charter	No	Partial response	Monitoring developments as well as promoting market access for an unspecified client
8	Kreab Gavin Anderson	member charter	No	Partial response	Not "much" involved in actual lobbying or influencing. Under current rules they do not discuss openly in detail what they do for different clients.
9	G-Plus	member	No	Yes	Following developments in the negotiations but no specific lobby mandate

					at that time
10	Weber Shandwick	member	No	Yes	Keeping an eye on developments; not involved in any lobbying activities
11	Edelman	member	No	Partial response	Following the debate on TTIP; not willing to detail publicly what work they undertake with individual clients because it is not required by the Register rules
12	FTI consulting	member charter	No	Not willing to take part to the survey	All their reporting complies with requirements of EPACA code of conduct and they have no further comment
13	Central Lobby Consultants	member	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP.
14	Lysios	member	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
15	Cambre Associates	member charter	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
16	CICERO Consulting	member	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
17	Biontino	member	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
18	Eamonn Bates	member	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
19	Athenora		No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
20	LOGOS Public Affairs	member charter	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
21	FairValue	member	Not registered	Yes	Not involved and have

	Corporate & Public Affairs				not been involved in lobbying in the past in relation to TTIP
22	LaRoche Conseil	member charter	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
23	Llorente y Cuenca	member	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
24	Harwood Levitt	member	No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
25	ADS Insight		No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
26	PA Europe		No	Yes	Not involved and have not been involved in lobbying in the past in relation to TTIP
27	Acumen	member	No	No	
28	ELAN	member	No	No	
29	Havas	member	No	No	
30	Avisa	member	No	No	
31	APCO worldwide	member charter	No	No	
32	Hume Brophy	member	No	No	
33	Political Intelligence		No	No	
34	EaconGroup	member	Not registered	No	
35	Eurofacts	member	Not registered	No	
36	Ostossola		Not registered	No	
37	Sovereign Strategy	member	No	No	
38	Mas Consulting	member	Not registered	No	
39	Action Europe	member	No	No	
40	Hill Knowlton		No	No	
41	Cabinet DN		No	No	
42	Grayling		No	No	
43	ESL & Network		No	No	

44	Communications and Institutions		No	No	
45	Rohde Public Policy		No	No	
46	EPPA		No	No	
47	Landmark Europe		No	No	
48	Europtimum		No	No	
49	Eurotarget		No	No	
50	Alber & Geiger		No	Yes	No. Past and current activities for any of their clients do not involve lobbying work on the TTIP
51	Freshfields		Not registered	Yes	No. Past and current activities for any of their clients do not involve lobbying work on the TTIP
52	Mannheimer Swartling		No (Registered on 12 Jan 2015)	Yes	No. Past and current activities for any of their clients do not involve lobbying work on the TTIP
53	Clifford Chance		Not registered	Not willing to take part to the survey	
54	Akin Gump		Not registered	Not willing to take part to the survey	
55	Van Bael & Bellis		Not registered	Not willing to take part to the survey	
56	Cleary Gottlieb		Not registered	Not willing to take part to the survey	
57	Mayer Brown		Not registered	No	
58	DLA Piper		No	No	
59	Squire Sanders		Not registered	No	
60	Herbert Smith Freehills		Not registered	No	
61	Freshfields		Not registered	No	
62	Fieldfisher		Not registered	No	
63	Alston & Bird		Not registered	No	

64	Keller Heckman		Not registered	No	
65	Norton Rose		Not registered	No	
66	Shearman & Sterling		Not registered	No	
67	Latham & Watkins		Not registered	No	
68	Dentons		Not registered	No	
69	Hogan Lovells		Not registered	No	
70	Covington		Not registered	No	
71	Baker Botts		Not registered	No	
72	Wilmerhale		Not registered	No	
73	K&L GATES		Not registered	No	
74	White & Case		Not registered	No	
75	Crowell & Moring		Not registered	No	
76	Sidley Austin		Not registered	No	
77	Arnold Porter		Not registered	No	
78	Quinn Emanuel Urquhart & Sullivan		Not registered	No	
79	Luther		Not registered	No	
80	Linklaters		No	No	
81	NautaDutilh		Not registered	No	
82	Grayston Company		Not registered	No	

- i CEO is not convinced the EU's transparency register search engine is 100% reliable. Search terms were “TTIP” and “Transatlantic Trade and Investment Partnership”.
- ii Registrants are required to update their lobby register entry on at least an annual basis and so the data available at the time of the survey should have covered 2013-2014.
- iii Secret lobbying by law firms shows the need for a mandatory transparency register”, November 2013, <http://corporateeurope.org/blog/secret-lobbying-law-firms-shows-need-mandatory-transparency-register>
- iv Art. 8 of the Inter-institutional agreement on a common Transparency Register between the Parliament and the Commission: “The scope of the register covers all activities, other than those excluded in part IV, carried out with the objective of directly or indirectly influencing the formulation or implementation of policy and the decision-making processes of the EU institutions, irrespective of the channel or medium of communication used, for example outsourcing, media, contracts with professional intermediaries, think-tanks, platforms, forums, campaigns and grassroots initiatives. These activities include, inter alia , contacting Members, officials or other staff of the EU institutions, preparing, circulating and communicating letters, information material or discussion papers and position papers, and organising events, meetings or promotional activities and social events or conferences, invitations to which have been sent to Members, officials or other staff of the EU institutions. Voluntary contributions and participation in formal consultations on envisaged EU legislative or other legal acts and other open consultations are also included.” <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P7-TA-2011-0222+0+DOC+XML+V0//EN>
- v Annex 1 of the Inter-institutional agreement on a common Transparency Register between the Parliament and the Commission, <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P7-TA-2011-0222+0+DOC+XML+V0//EN>