

Dear Margarida,

It is not normal commercial practice for companies to publish lists of their clients. However by way of indication and in the interests of transparency I can tell you that Bagehot Ltd has carried out one-off projects for one of the 'big four' accountancy firms, for an environmental technology company and for an organisation representing local government interests. Bagehot Ltd is also retained on a longer term basis by a European federation of companies working in the field of health.

None of the above involves any conflict of interest with my work as a MEP and there are few, if any, overlaps.

Kind regards,

Graham Watson

Sir Graham Watson
Managing Director
Bagehot Limited.

On 10 Feb 2015, at 14:45, Margarida Da Silva wrote:

Dear Sir Graham Watson,

Thank you for your reply.

I have just one more question. You mention in your email that GoG and IAC are just two of several bodies which have contracted your company to provide services. What other bodies/companies have contracted Bagehot Ltd?

Thank you for your cooperation and time.

Yours sincerely,
Margarida da Silva

On 09/02/15 17:06, graham watson wrote:

Dear Margarida da Silva,

Further to my email of last week I am pleased to answer your questions seriatim. I therefore reproduce your questions below in the form you sent them, in italics for ease of reference, and provide my answer below each of them.

1. According to the press release published by the Government of Gibraltar last October you have been appointed the head of Gibraltar's representation office in Brussels to "lead and direct the lobbying activities of the Government in the EU capital". What specific tasks will

this involve?

My commitment to Gibraltar is primarily a political commitment. I am appalled at the way in which Gibraltar's citizens are denied the rights which most other EU citizens can take for granted. As a MEP I worked hard to secure these rights and I am pleased this was reflected in the votes cast by Gibraltarians at last year's EP elections.

Subsequent to the elections I was approached by HM Government of Gibraltar (henceforth HM GoG) and offered a full time job as head of a new office they wish to set up in Brussels. I declined the offer, since I have a number of other commitments and interests to which I also wish to devote time.

On 1 October I established a public affairs company called Bagehot Ltd (UK registered company no. [09251079](#)). HM GoG is one of a number of bodies which has contracted my company to provide services. The services provided to HM GoG include helping them to set up a more substantial presence in Brussels than they have hitherto enjoyed, and advising them more generally on EU affairs. Their brief to me is a wide one but focusses on providing strategic advice rather than lobbying EU institutions directly on their behalf. It involves, for example, advising Gibraltar government ministers and agencies on who they should lobby and how they might best proceed. In the period prior to the opening of their new office in Brussels I have assisted them in securing certain meetings, but in a political and voluntary rather than a business capacity (and therefore unpaid) and on an interim basis until their office is established.

2. That same press release mentioned that you will be responsible for "facilitating the promotion of business in Gibraltar from Brussels." Can you please describe in detail what this will entail?

The Gibraltar Government intends that their new office should be available to help businesses from Gibraltar promote themselves at EU level. Since the new office is not yet established this process has not yet started. However I have been invited, for example, to speak to the Gibraltar Federation of Small Businesses on how the EU works.

3. When did this role start and is it a paid position?

HM GoG contracted Bagehot limited to advise them starting 1 November 2014 and the company bills them directly for my services on an hourly basis.

4. What overlaps do you perceive in your work for the Gibraltar representation office and your previous work as an MEP?

As a MEP I was elected from 2004-09 and 2009-14 to represent the citizens of the South West of England and Gibraltar. In that capacity I naturally did what I could to assist my constituents. The work I do now sometimes relates to the work I did as a MEP (to the extent that it is concerned with the same issues) but is without prejudice to the work of the current MEPs for the SW England and Gibraltar constituency. Therefore I perceive no conflict of interest.

5. Are there any specific issues which you have agreed with the Gibraltar government that you will not work on because of the risk of conflicts of interest with your work as a former MEP?

No, since no conflict of interest is perceived.

6. Last September it was also announced that you would be joining APCO Worldwide's International Advisory Council. Can you please describe the activities this position will entail?

It entails providing strategic advice to APCO on how best to represent their clients in promoting their interests. Further information about APCO's advisory council can be found on their website.

7. When did this role start and is it a paid position?

It started on 1 September 2014 and, as with HM GoG and other clients, I bill APCO monthly for the number of hours I have worked.

8. What clients do/will you have as an APCO Worldwide advisor?

As a contractor to APCO I am not in a position to divulge information about their clients. However, APCO has just performed the annual update of its registration in the European Transparency Register, which should give you an idea of some of its clients.

9. Do you perceive there to be any overlap between your work as an APCO Worldwide advisor with your previous work as an MEP? If so, can you please describe them?

I perceive few if any overlaps and no conflict of interest. Moreover, I have a specific agreement with APCO that I would not work on behalf of any

clients if this involved any conflict of interest with my previous work as a MEP.

10. Are there any specific issues which you have agreed with APCO Worldwide that you will not work on because of the risk of conflicts of interest with your work as a former MEP?

(See answer above)

11. What contacts, if any, did you have with APCO Worldwide while you were still an MEP?

I had almost no contact with APCO Worldwide while I was a MEP. On rare occasions - perhaps four or five at most over twenty years - I was aware of being approached by them and asked to meet one of their clients. I did not always agree to do so. I received no remuneration from APCO at any point in my tenure of public office.

12. Are you aware of the MEP code of conduct which says “Former Members of the European Parliament who engage in professional lobbying or representational activities directly linked to the European Union decision-making process may not, throughout the period in which they engage in those activities, benefit from the facilities granted to former Members under the rules laid down by the Bureau to that effect”?

Of course I am.

13. What contact have you had or do you plan to have (formally or informally) with the European Parliament, MEPs or their staff on behalf of the Government Gibraltar and/or APCO Worldwide? Do you intend to apply for a European Parliamentary lobbyist pass?

My role as a provider of strategic counsel involves essentially providing advice to my clients about who they might usefully approach and how. I have however applied for registration under the new transparency rules which may result in the grant of a lobbyist pass.

14. Have you claimed the transitional allowance for MEPs since leaving the European Parliament? If so, how much does this amount to per month?

Yes. Details of the allowance can be obtained from Parliament.

15. How do you respond to concerns that your move from being an MEP to becoming a representative for Gibraltar and advisor for APCO Worldwide

could provoke the risk, perception or actuality of conflicts of interest?

I am not aware of any such concerns and I can perceive no basis on which anybody should have such concerns.

16. Do you have any other comments to make about these issues?

My business activities through the company I own and manage are entirely in keeping with the letter and the spirit of the European Parliament's rules, which I was active in designing and supporting.

Yours sincerely,

Graham Watson

Sir Graham Watson.