



How "new and improved" is the EU's lobby register? 27 May 2015

In January 2015, the Alliance for lobbying transparency and ethics regulation (ALTER-EU) published "New and improved? Why the EU lobby register still fails to deliver", a report which exposed problems with the lobby register, from organisations that carry out lobbying but who are not registered; to out-of-date data; and misleading or inaccurate entries. At the same time, the EU lobby register started a process which required all registrants to update their entry to fit with new disclosure requirements. This process took three months and ended on 27 April 2015, meaning that all entries in the EU lobby register should now be up-to-date, or at the latest, four months old.

ALTER-EU has now re-visited its "New and improved?" report, as well as other sources, to find out if the problems highlighted in January are still present in May. The results of this review are presented below; all data in the EU lobby register was checked on 19 May 2015 and then again on 26 May. The references to LobbyFacts refer to a separate website which uses the data available on the EU lobby register from before the recent round of updates, ie. to data available on 26 January 2015.

Financial actors previously missing

"New and improved?" highlighted a range of financial sector lobbyists that were not in the EU register as of 26 January 2015.

Credit Suisse joined the register on 28 April 2015 with a lobby spend of €1,250,000 - €1,499,999 in 2014 and the full time equivalent of 2.2 lobbyists.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=206549617146-90

The **City of London Corporation** has not joined the lobby register. In January we <u>reported</u> that it had "held a lobby meeting with UK Conservative MEP Emma McClarkin in June 2014 concerning financial services regulation; met with Conservative MEP Kay Swinburne at the Future of London dinner in January 2014; and had a lobby meeting with the Commission's internal market and services directorate (DG MARKT) in April 2014."

Standard & Poors has not joined the lobby register; yet major lobby firm <u>Fleishmann-Hillard</u> reported that it received €100,000 - €199,999 from the credit ratings agency in 2014.

Neither the **Swiss Bankers Association** nor the **European Banking Industry Committee** have joined the EU lobby register since our report.

Lobby consultancies previously missing

"New and improved?" highlighted a range of EU lobby consultancies that were not in the EU

register as of 26 January 2015.

EUTOP International has not joined the lobby register. In January we <u>reported</u> that it was a "Berlin-based lobby agency with at least five lobbyists, which offers "representations of interests of private enterprises, associations and organisations towards the institutions of the European Union".

Ketchum is also still not registered. However, the lobby firm <u>g plus</u> reports "Ketchum Ltd (Russian Federation)" as a client with a lobby revenue of €100,000 - €199,999.

PACT European Affairs has now joined the register with its six full-time lobbyists. It reports an annual lobby turnover of €750,000 in 2014 and annual lobby costs of €550,000, but only four clients who between them contributed a maximum of €275,000 turnover. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=990838616162-48

Eacon Group has not joined the register. In January we <u>reported</u> "Head-quartered in Brussels, lobby consultancy Eacon Group states on its website that "*Transparency and confidentiality form the foundation of eacon's success*". It lists 40 per cent of its clients as business and trade associations and 25 per cent as corporate.

Law firms previously missing

"New and improved?" highlighted a range of law firms that carry out lobby activities and which were not in the EU register as of 26 January 2015.

Covington & Burling joined the register on 15 May 2015 declaring the equivalent of seven full-time lobbyists and an annual lobby turnover of more than €1,000,000 for the year to September 2014. Clients include Microsoft and many from the Big Pharma sector: Eli Lilly; Sanofi Pasteur; Cubist Pharmaceuticals; European Federation of Pharmaceutical Industries & Associations (EFPIA); and the Pharmaceutical Research and Manufacturers of America. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=083671317381-09

Mayer Brown Europe-Brussels joined the lobby register on 20 February 2015. It lists a lobby turnover of less than €99,999, and annual lobby costs of €50,000 - €99,999 for 2014, but only two clients (United States Steel Corporation and PT Djarum) which provides it with revenue of less than €9,999 each. Furthermore, lobby firm g plus reports that in 2014, it received €100,000 - €199,999 lobby revenue from "Mayer Brown Europe-Brussels LLP (Coalition of non-European companies involved in fertilizer production and trade with the EU)". It is not clear what connection Mayer Brown has with the coalition but the coalition is not mentioned in Mayer Brown's own registration. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=878143516137-06

Freshfields Bruckhaus Deringer, Hogan Lovells, Clifford Chance, Dentons and Field Fisher Waterhouse have not joined the lobby register.

ALTER-EU further notes that **White & Case** is not in the EU lobby register, but it is registered as a client of <u>APCO Worldwide</u> in 2013 providing revenue of €50,000 - €99,999.

Bird & Bird which used to be in the register with a turnover of €10,000,000 and up to 30 lobbyists has now dropped out of the register entirely. According to LobbyFacts, in January 2015 when it was still registered, **Bird & Bird** was at the top of the <u>list</u> of law firms (alongside Beiten Burkhardt) with the biggest lobbying turnover in the whole register.

Major corporations previously missing

"New and improved?" highlighted a range of major corporations, active in Brussels' lobbying, which were not in the EU register as of 26 January 2015.

Electrabel is not in the lobby register although <u>PA Europe</u> in 2013 recorded lobby revenue of €300,000 - €399,999 from the Belgian energy corporation, making it its largest lobby client. Electrabel is a subsidiary of GDF Suez; GDF Suez is now called Engie and is <u>registered</u>. GDF Suez <u>declared</u> lobby expenditure of €2,500,000-€2,750,000 in 2013, dropping to less than €9,999 in 2014 (now as Engie) so it is very unlikely that Electrabel's lobby costs could be included within Engie's registration.

The major mining firm **Anglo-American** is not in the lobby register. However in 2014, the lobby firm <u>Hanover Communications</u> reported a lobby revenue of €10,000 - €24,999 from the company.

Ajinomoto is not represented in the lobby register although <u>PA Europe</u> in 2013 reports a lobby income of €100,000 - €199,999 from the Japanese food, chemical and pharmaceutical corporation.

Northrop Grumman is not in the lobby register although in 2013, lobby firm <u>Hill & Knowlton</u> received €25,000 - €49,999 from Northrop.

Maersk is not in the EU lobby register. In "New and improved", we <u>reported</u> that the major Danish trade, shipping and energy conglomerate had taken part in stakeholder meetings with the Commission on TTIP and that its chief executive is also the chairman of the trade and market access working group at the major lobby group, the European round table of industrialists.

Linde gas is not in the lobby register and is no longer listed as a client of Kreab Gavin Anderson.

Swisscom is not in the lobby register and is no longer listed as a client of Furrer.

General Motors is <u>represented</u> in the lobby register via Opel Group which joined in 2008.

Vinci Concessions joined the lobby register on 13 March 2015 reporting a lobby expenditure of €120,000 in the year to December 2014.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=706757116552-08

Prysmian Group joined the lobby register on 16 April 2015 recording a lobby expenditure of €1,000,000 - €1,249,999 in 2014.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=974253816995-48

TESCO joined the lobby register in 5 February 2015 with a lobby expenditure of €100,000 - €199,999 in the year to February 2015 and 0.8 lobbyists.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=190810415919-85

Consultancies and law firms with undisclosed clients

In "New and improved?" we reported that around 150 consultancies and law firms were in breach of the lobby register rules by not disclosing their clients. Instead many referred to them as "confidential" or similar. We referred to a number of specific organisations in the text and very few of them have improved their lobby registrations since January.

This problem may partly reflect the fact that some consultancies with a purpose other than lobbying (ie. to provide services in the areas of IT, engineering etc) are mistakenly registering in the category aimed at lobby consultancies. Such organisations should instead register in the company category, if their lobby activity is exclusively conducted on behalf of themselves and not on behalf of clients.

For law firms, at least 25 of the 88 registered declare a lobby turnover but do not disclose their clients fully. Of these, three write that their clients are confidential (one claiming they are natural persons) while 10 give unclear explanations of their clients. Sometimes the law firms describe what they are doing instead of who their clients are, or just provide general descriptions of clients rather than specific names. Five only list some of their clients (as the numbers do not add up), one uses an unexplained acronym, and seven give a lobby turnover but then complete the field "own activities, no clients" with "none" or a "-", which is contradictory.

As an example, according to LobbyFacts, law firm **Beiten Burkhardt** used to list its clients; but now it says in the data field 'own activities, no clients', "Vertraulich" ie. Confidential, while still declaring a lobby turnover of up to €99,999.

Current entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=95076788289-77

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/33e51d13997f476a9526f8d0d1f27b82

Law firm **A.Silvestro** used to record €100,000 - €150,000 for lobby turnover in 2013. It now records less than €99,999 for its 2013 lobby turnover but still lists clients as "confidential". Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=360495914648-79

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/8c667547d3ff436394665d566d882199

The consultancy **NineSigma Europe BVBA** also does not disclose its clients yet. For the year 2013 it says, for clients providing lobby revenue below €9,999, "no clients so far as we know". In the category for new clients providing revenue below €9,999, it says: "our clients choose to remain anonymous". For 2013 it declares lobby revenue of less than €99,999 yet it had previously declared €2,250,000 - €2,500,000 and 12 lobbyists.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=07807936046-22

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/e8dbcbadb77a4100aa15adf91b81dd1e

Consultancy **Lake Isle M&A Incorporated** used to list €50,000 lobby turnover; now its lobby turnover is less than €99,999 in the year to March 2015. However, no clients are listed. Instead it says in the field 'own activities, no clients', "NA".

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=87637846272-89

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/7b39a40dd4b741c1932e825fcdf58940

Consultant **Petr Kolar** now lists one client and indicates the size of two others but does not provide their names:

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?

id=237732715185-74

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/df2764a9a8824476abad2b01185b0686

Consultancy **MAQASSAR** does not list clients. For the field 'own activities, no clients' it says "activité de veille".

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=43070944601-40

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/3c5d8eec4e01458db1be8e8af4c01060

Consultancy **TechLive247** is no longer in the lobby register.

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/8f82e2401c4148e7bf9704788d8f85f0

Consultancy **Truenology Technologies** is no longer in the lobby register.

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/0c828f75243d497d9d8b93a608595465

Consultancy **CIEL & CO** is no longer in the lobby register:

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/b517079fbf9247c191ba57bb47f4bcb0

Law firm **MENA Chambers** is no longer in the lobby register:

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/a2d552ac2c7f48cba8146f4042b2ce93

Under-reporting of lobby expenditure

In ALTER-EU's view, too many organisations under-report their spending on lobbying, perhaps ignoring the lobby register's <u>guidelines</u> that "outsourced activity costs" must be included in declarations, "even if a consultant working on contract makes a separate declaration in the Register".

In January 2015, NGOs complained to the EU lobby register authorities about the entry of **Goldman Sachs** which gave a 2013 lobby expenditure figure of less than €50,000. We suggested that Goldman Sachs had substantially under-reported its true lobby spend which included spending €250,000 - €300,000 on Afore Consulting services between July 2013 and June 2014, and €200,000 - €250,000 on Kreab Gavin Anderson's services in 2013. It did not seem possible to reconcile that information with Goldman Sachs' own disclosure that it only spent €50,000 in 2013 on EU lobbying. Since then, it has updated its registration to report €700,000-€799,999 lobby spend for 2014. The outcome of the NGOs' original complaint is not yet known. More information on this story is available here.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=701266814986-18

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/db7a1669f78f44d5830db87153713a63

Bloomberg previously declared €50,000 lobby expenditure for 2013 when it joined the lobby register on 22 January 2015. Now, in its updated registration it provides a figure of €50,000 - €99,999 for 2013. However, lobby firm <u>Sovereign Strategy</u> says that Bloomberg provided it with lobby revenue of €100,000 - €199,999 in 2013.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=941851915685-19

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/cad15f2d93054188979d80c331f4fa60

The US consumer technology and defence multinational **Honeywell** has increased its lobby declaration from €250,000 - €300,000 in 2013 to €500,000 - €599,999 for 2014.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=75311753240-67

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/f7cdf5461b624f0487c4e7547d741120

Pharmaceuticals multinational **Shire** has increased its lobby expenditure disclosure from €200,000 - €250,000 in 2013, to €700,000 in 2014. It also provides a breakdown into different categories including: employees, public affairs consultancy fees, office & administrative expenses etc. Entry:

http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=60329985751-43 Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/19537a79d1a243e0bc4ab002429a2752

In the energy sector, Friends of the Earth Europe has <u>recently highlighted</u> a number of examples of suspected under-reporting of lobby spending.

The French gas and electricity company **Engie** (formerly called **GDF Suez**) declared a decrease of lobby expenditure from €2,500,000-€2,750,000 in 2013 to than less than €9,999 in 2014. Yet Engie declares the equivalent of three full-time lobbyists. It seems completely unrealistic that all salaries and activities (at least 14 high-level meetings with the European Commission since 1 December 2014) could be covered by a budget of less than €10,000.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=90947457424-20

Controversial UK fracking company **Cuadrilla Resources** has stated their lobbying costs have decreased from €50,000-€100,000 in 2013 to less than €9,999 in 2014. The newly posted figure of less than €10,000 spent on EU lobbying is, however, surprisingly low, given the importance of energy issues and especially gas on the European policy agenda.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=584530510830-81

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/542b26ce1fbe47f98d429573d801e485

And finally, law firm **Beiten Burkhardt** <u>declared</u> €10,000,000 lobby turnover until January 2015. Yet now its <u>reported</u> lobby turnover is less than €99,999. Can it really have dropped off by so much in such a short period of time, or is either their previous or current registration inaccurate?

Outdated financial data

Prudential has now updated its lobby registration financial data from the previous 2009 figures to now providing 2014 figures; of course this means that for the years 2010-2013, there was no transparency about Prudential's lobby expenditure.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=65288482768-64

European Landowners' Organisation now provides 2014 financial data, updated from 2011. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=36063991244-88

Ogilvy Group has also now updated its financial data from 2011 to 2014. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=81904791851-37

Monsanto now provides financial data through to August 2014, updated from 2012 figures. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=678841411135-35

Yet we notice further outdated financial data in the lobby register, and some massively so:

Association des couples multiethniques de France reports data from 2003.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=186164515720-49

Michel Abdelahad reports data from 2005.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=90135938437-51

DIERREPI CONSULTING di Dom Rosario Poidimani reports data from 2007.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=60059498195-16

Lucian Buzea reports data from 2008.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=939908510932-67

PLATAFORMA DE ONG DE ACCION SOCIAL reports data from 2009.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=7206466623-36

A further 28 organisations report financial lobby data from 2010; 85 from 2011; and 293 organisations from 2012. A full list will be passed to the EU lobby register secretariat.

Unexplained acronyms as clients

In "New and improved?", we criticised more than 200 lobby consultancies and law firms that used acronyms when listing their clients' names, rather than the client's full name. Acronyms are confusing and are sometimes shared by several different organisations.

Of the organisations that we specifically mentioned in the report text, many have now improved their reporting of clients and now provide their full names. As an example, see **Interel European Affairs**:

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=7028457765-59

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/9194aed594bd4c6ba391058ae5772d3d

An exception to this appears to be **Rohde Public Policy** where many acronymed clients remain:

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=96530144280-28

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/3885157de1484af185aaaa8422861e22

ESL & Network European Affairs seems to have dropped most of its clients:

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?

id=35467643719-92

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/823689b3d43e46a68d652269af836918

Other 'dodgy data'

There are many other problematic entries in the lobby register, and we indicated a few in "New and improved?".

The French trade union **Syndicat Formation et Développement CFE-CGC** no longer declares 500 lobbyists but 0.2 which appears to be more reasonable considering its less than €9,999 lobby expenditure in 2013.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=564787713581-89

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/e798a8b078ee4e858bbc58a7570544f8

We previously reported that consultancy firm **Globe Consultants International Ltd** listed its share of turnover from EU lobbying on behalf of clients as €0, but then lists a lobby client, the Government of Trinidad and Tobago, as generating a turnover of €350,000 - €400,000. Now Globe Consultants International Ltd is no longer in the register.

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/bd98c9e9f4b74faf83e8cee948b09955

We also mentioned the problem of duplicate entries in the lobby register. We have since sent a list of those to the lobby register secretariat and it has assured us that these have now all been removed.

BearingPoint previously reported having zero lobbyists but stated that its turnover related to representing interests to EU institutions on behalf of clients was a staggering €552,795,000. After we published "New and improved?", it contacted us to say that the figure declared in its register entry was not, in fact, the income attributable to EU lobbying, but rather its annual turnover. In its updated registration, BearingPoint says "We are not a lobby firm, and do not have any resource active in lobbying activities." It declares zero lobby expenditure for 2013. BearingPoint says that the European Commission suggested that it registered, but in ALTER-EU's view, if it does not carry out any EU lobbying either on behalf of itself or its clients, then it should not be part of the lobby register.

Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=230831915098-10

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/c15cc64bf16840b6bd16acd9711b3290

Since "New and improved?" we have come across a series of other registrations which look inaccurate:

Nederlandse Belangenvereniging Draadloze Audio verbindingen PMSE (a lobby group for the wireless audio sector) joined on 10 April 2015 and lists 1435 lobbyists, and 628 full time equivalents. Yet in 2013 its lobby spend was less than €9,999.

 $\underline{Entry: \ \underline{http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?}} \underline{id=558674316909-14}$

Triodos Bank registers 1000 lobbyists but again 2014 lobby costs of less than €9,999. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=543556311400-69

For PMSE and Triodos, it is likely that there has been confusion about the difference between staff members and actual EU-level lobbyists.

Suspended entries

If lobby organisations did not update their lobby registration before 27 April, they were deleted from the public register. Transparency International reported that there were 1552 organisations to whom this applied. Since then, some of those have re-joined; others may no longer be lobbying; and some may have decided that they no longer wish to be part of the register. Failing to rejoin the register should mean organisations forfeit the opportunity to apply for European Parliament access passes and lobby meetings with the most senior Commission officials. A number of organisations with substantial recent lobby expenditure have not yet re-joined and a few examples are listed below, all absent from the register as of 26 May 2015:

Forum Public Affairs previously reported an annual lobby turnover of €700,000 - €800,000. Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/56afd8995b294532a5308164f2c1367d

MHP Communications previously reported an annual lobby turnover of €600,000 and five European Parliament pass-holders. Its <u>website</u> says "Our Brussels office ... offers both a sophisticated understanding of EU Institutions and policies, as well as a wide network of contacts that enables our clients to have access to key decision makers, when it matters." Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/27c1a4e2c96b4f84870ab7a37d3e1d66

The UK think-tank **Policy Exchange** previously reported annual lobby spend of €3,500,000 - €3,750,000.

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/4d9b4d969bf64d3a8d472a4a3f2b885b

Gazprom, the Russian energy giant, did not initially meet the deadline to update its own entry. It later updated its registration, but reported spending less than €10,000 on EU lobbying, despite having 11 European Parliament pass-holders. This was clearly ridiculous, and after this was exposed by campaigners on Twitter, the registration was updated to €900,000 - € 999,999 lobby expenditure for 2014. This is still less than the €1,000,000 - €1,250,000 previously declared. Entry: http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do? id=622135013267-04

Previous entry via LobbyFacts:

http://lobbyfacts.eu/explore/data/55055317c64648aba8af40135ec53521

Additionally, we have found 67 accredited lobbyists listed on the website of the <u>lobby register</u> that were listed as accredited on behalf of 44 organisations that are no longer on the register, having been suspended after failing to update their lobby register entry before the deadline of 27 April. It is unclear if these accreditation badges have been deactivated or not; a full list will be passed to the lobby register secretariat.

Bandwidth problems

Under the rules of the EU lobby register, lobby consultancies and law firms must now declare their estimated annual costs for lobbying (as a new requirement), as well as their "annual turnover attributable to activities covered by the register". For the latter, organisations can provide a specific

figure or choose a bandwidth which are given as 0-99,999; 100,000-499,999; 500,000-1,000,000; or >1,000,000 euros. These bandwidths are obviously unreasonably broad (especially the category >1,000,000 euros) and, as the table below indicates, in our view, too many of Brussels' largest lobby consultancies use the huge bandwidth of >1,000,000 euros and therefore fail to provide detailed transparency on their lobby turnover. Using such a broad bandwidth for lobby turnover makes it impossible for third parties to verify whether all clients are likely to have been reported. Confusion is also added when there is a big difference between declared lobby costs and declared lobby turnover. If the register is to offer registrants the opportunity to record financial data via bandwidths, the categories used should be far, far narrower, especially for higher sums.

Lobby consultancy	Lobby costs	Lobby turnover
Fleishman-Hillard	6,250,000 - 6,499,999	>= 1,000,000
Burson-Marsteller	5,000,000 - 5,249,999	>= 1,000,000
APCO Worldwide	2,500,000 - 2,749,000	>= 1,000,000
FTI Consulting Belgium	1,500,000 - 1,999,999	>= 1,000,000
Kreab Gavin Anderson	3,250,000 - 3,499,999	>= 1,000,000
G Plus Ltd	3,000,000 - 3,249,999	>= 1,000,000

An identical system is in place for law firms and similar problems may well be occurring there too, compounded by the fact that many law firms already refuse to list their clients.