


# **RUSSIAN CORPORATE LOBBYISM IN THE COUNTRIES OF THE EUROPEAN UNION**

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**A Research Report by Transparency International Russia**





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**Russian Corporate Lobbyism  
in the Countries of the European Union**

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# 1. INTRODUCTION

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When it comes to the Russian foreign trade, one should note that the European Union has long been ranking at the top and it continues to be the country's largest trading partner. In 2015, the share of the European Union accounted for 44,8% (\$237,6 billion) of Russia's total trade turnover (in 2014, it accounted for 48.1 %).

The economic crisis, global constraints on demand, the decrease in the price of commodity prices and the ban imposed by Russia on EU food imports, have significantly reduced the volume of trade between the EU and Russia.

Russia's exports to the EU decreased by 37.7%, import to Russia from EU by 41.5%, if expressed in price level indices of 2015. At the same time, Russia's key trading partners of the previous year were Germany (with a turnover of 44.2 billion), the Netherlands (43.5 billion dollars) and Italy (30.1 billion dollars). According to the Ministry of Energy (Minenergo) the Russian oil exports to Europe amounted to 150 million tons in the first quarter of 2015 <sup>1</sup>. Notably, after two years of subsequent decline, 2015 has seen a rise in the physical volume of Russia's exports to the EU.

The numbers suggest that the Russian business is actively building economic ties throughout the European Union, which illustrates that; the sanctions and intergovernmental tensions do not significantly impede the activities of Russian companies in the EU.

The European model of promoting business interests at the national and supranational level has always been associated with lobbying. In 2015, the international organization Transparency International published a report on 'Lobbying in the European Union: hidden influence, privileged access', which examined lobbying practices in the European Union. Transparency International researches have scrutinized the difference in regulatory practices of lobbying activities at the national level in the EU, the distinctive institutional approaches to lobbying, and the lack of a uniform regulation in this area in EU countries. These peculiarities often allow avoiding the disclosure of information on the adoption of supranational decisions in the interest of specific influence groups.

In order to regulate lobbying activities, registers were established in several countries and at the level of EU institutions. These registers offer the opportunity to assess the formal side of the lobbyists' registration and, in some cases, even to understand who stands behind particular powerful decisions. Many EU countries have not taken the decision to establish such registers, which impedes assessing the degree of corporate influence on the government.

Russian organizations actively promote its interests in the EU, making it mandatory, therefore, for themselves and its agents (PR agencies, communication companies, GR groups) to be catalogued in public registers both at the national and supranational level. Major Russian state-owned companies are not always promoters of exclusive business interests, and, therefore, often perceived as "agents of the Russian government" who back European politicians. In this way they create objective difficulties for cooperation between Russian organizations and representatives of the European authorities. This factor encourages Russian companies to avoid public promotion of interests and instead resort to informal or hidden lobbying practices.

Despite this fact, a certain amount of information still remains accessible for unlimited research in the registers. It has allowed us to analyze public lobby registers in the EU and describe the most striking cases of interest promotion by Russian companies and organizations.

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<sup>1</sup> Anna Koroleva. Russian Oil Goes Around Iran : <http://expert.ru/2016/04/11/miru-nravitsya-rossijskaya-neft/>



## 2. GLOSSARY

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<b>Collective advocacy and lobbying</b>	Collective advocacy and lobbying can be understood as the collective action of interest groups who are facing a common problem to reach certain goals and influence policy-making process <sup>2</sup> .
<b>Consultant lobbyist</b>	A consultant lobbyist is a person who receives compensation or reimbursement to represent the interests of a client by communicating with public decision-makers.
<b>Contract lobbyists</b>	Contract lobbyists are persons or companies that are paid to represent the interests of an entity or another third party to communicate directly or through the person's agents with public officials for the purpose of influencing legislative or administrative action.
<b>Corporate Lobbying</b>	Corporate lobbying refers to companies' engagement in activities with the purpose of influencing political processes and decisions in favor of their interests <sup>3</sup> .
<b>Lobbying</b>	<p>Lobbying implies any direct or indirect communication of an intermediary or a representative with public officials, politicians for the purpose of influencing public decision-making in favor of a specific cause or outcome <sup>4</sup>. It is carried out by or on behalf of any organized group and its methods vary greatly <sup>5</sup>.</p> <p>It is worth noting that lobbying is a legitimate activity and a democratic right that can provide the authorities with valuable insights and data. Yet, even when allowed by law, these acts can become distortive if disproportionate levels of influence exist – by companies, associations, organizations and individuals <sup>6</sup>. Lobbying is, therefore, also associated with secrecy and can lead to unfair advantages for vested interests, particularly if occurring through informal channels and behind closed doors, thereby putting public interest at risk <sup>7</sup>.</p>
<b>Lobbyist</b>	A lobbyist is any organization, interest group or self-employed individual engaged in activities carried out with the objective of directly or indirectly influencing the formulation or implementation of policy and decision-making processes at the respective target level.

<sup>2</sup> Dr Paul A. Shotton, Mr Paul G Nixon – 2015, p.19. Lobbying the European Union: Changing Minds, Changing Times.

<sup>3</sup> Stephanos Anastasiadis (2006): Understanding corporate lobbying on its own terms, No. 42–2006 ICCSR Research Paper Series, International Centre for Corporate Social Responsibility, Nottingham University Business School, p.1. URL: <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.98.9698&rep=rep1&type=pdf>

<sup>4</sup> TI Report Lobbying in Europe (2015, p.6), URL: [http://www.transparency.org/whatwedo/publication/lobbying\\_in\\_europe](http://www.transparency.org/whatwedo/publication/lobbying_in_europe)

<sup>5</sup> A Dictionary of Economics (3 ed.), John Black, Nigar Hashimzade, and Gareth Myles, <http://www.oxfordreference.com.libproxy.ucl.ac.uk/view/10.1093/acref/9780199237043.001.0001/acref-9780199237043-e-1834>

<sup>6</sup> TI Glossary: <http://www.transparency.org/glossary/term/lobbying>

<sup>7</sup> OECD: <http://www.oecd.org/gov/ethics/lobbying.htm>



<b>Lobbying methods</b>	Lobbying methods refer to the way and the channels through which lobbying activities are realized. The diverse toolbox of lobbying methods varies from open participation in consultative processes to direct communications with decision-makers and the organization of grassroots campaigns. In the area of corporate lobbying, they include (but are not limited to) collective advocacy and lobbying, professional consultancies, trade and business associations, think tanks and research institutions, law firms, meetings and representative offices. Often, they occur through a variety of enablers, such as subsidiaries, contract lobbyists, in-house lobbyists, professional lobbyists, and consultant lobbyists.
<b>Formal lobbying practices</b>	Formal lobbying practices refer to lobbying activities, which take place within the framework of formal institutions and channels such as public hearings, consultation processes or formal meetings with decision-makers.
<b>Informal lobbying practices</b>	Informal lobbying practices are conducted outside formal channels and are invisible to the public eye. They often take ‘the form of direct communication and happen at such social settings, such as receptions, golf clubs, airport lounges, parliament bars’ and alike. While not necessarily providing immediate and meaningful dialogue opportunities, this type of lobbying channels may constitute a starting point for further potentially substantive communication, which is likely to translate into influence <sup>8</sup> .
<b>Lobbying regulation</b>	Lobbying regulation aims to cover all of the actors who are engaged in lobbying activities (such as consultant lobbyists, in-house lobbyists, public affairs firms, NGOs, corporations, etc.) as well as the key lobbying targets <sup>9</sup> . It may be an established act regulated by national or subnational law that sets certain requirements for the respective stakeholders. One of the widespread tools of lobbying regulation is the introduction of the lobby register <sup>10</sup> .
<b>Lobby register</b>	A lobby register is a public database or a list of lobbyists in which information about lobbying actors and, in most cases, the key information about their lobbying activities can be obtained. It may be useful for the public to track influence of interest groups in the political process, provided that the register has comprehensive definitions, and it is regulated by meaningful oversight mechanisms. Its effectiveness, therefore, depends on how it is constructed. Lobby registers within the EU vary from mandatory registers at the national level to voluntary registers applying to selected institutions or registers which target institutions at a sub-national level <sup>11</sup> .
<b>Direct lobbying channels</b>	Direct lobbying channels imply any form of direct communication, formal participatory and consultative processes.
<b>Indirect lobbying channels</b>	Indirect lobbying channels include the mobilization of the public through advertisements, public relations campaigns and funding advocacy organizations, think tanks or grassroots campaigns for private interests <sup>12</sup> .

<sup>8</sup> TI report (2015, p.15)

<sup>9</sup> TI report (2015, p.10)

<sup>10</sup> TI report (2015, p.31)

<sup>11</sup> ibid. TI report (2015, p.31)



<b>Lobbying target</b>	The term lobbying target refers to those actors and institutions which are the object of or targeted by lobbyists and lobbying activities. These are mostly public officials and representatives, having an (in)direct stake in or being part of public and political decision making processes.
<b>Mandatory lobbying registration</b>	A mandatory lobbying registration refers to the requirement stated in a national, subnational or supranational act (e.g. at EU-level) for lobbyists to disclose details on their lobbying budget and methods in an official register. Relatedly, formal access to public officials and decision makers - depending on the respective legal requirements - may be conditional upon prior registration.
<b>In-house lobbyists</b>	In-house lobbyists work for the group they represent. In general, the term refers to employees who spend a significant part of their time lobbying on behalf of their employer or a non-profit organization.
<b>Professional consultancies</b>	Professional consultancies provide expert advice in a subject area and professional lobbying services to their clients on different political levels.
<b>Responsible authority</b>	A government body related to the state or other public unit that is supposed to ensure the registration of lobbyists and their activities. In some cases this also includes the responsibility to monitor the regular update of information on the scope and form of lobbying activities.



# 2. REGISTRIES

**European Union** p. 18

**Ireland** p. 34

**United Kingdom** p. 60

**Netherlands** p. 44

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**Italy** p. 44

## List of abbreviations

<b>ABI</b>	Associazione Bancaria Italiana
<b>AAL</b>	Aughinish Alumina Limited
<b>APPC</b>	Association of Professional Political Consultants
<b>CEO</b>	Chief Executive Officer
<b>CEGH</b>	European Gas Hub
<b>COM</b>	European Commission
<b>DECLG</b>	Department of the Environment, Community and Local Government
<b>EP</b>	European Parliament
<b>EU</b>	European Union
<b>JSC</b>	Joint Stock Company
<b>JTRS</b>	Joint Transparency Register Secretariat
<b>NGO</b>	Non-Governmental Organization
<b>RLRA</b>	Romanian Lobbying Registry Association
<b>TI</b>	Transparency International

## REGISTER DESCRIPTION

### General information on a registry:

- 1 Name
- 2 Coverage (national / regional)
- 3 Responsible authority / body
- 4 Date of adoption, authority which adopted the register, purpose of adoption (if any)
- 5 Language(s) of register
- 6 URL
- 7 Scope of Coverage
- 8 Structure and Accessibility of register
- 9 Ongoing discussions (if applicable)

### Case-study

- Company's name
- A Whose interests are lobbied
- B Field of business activity
- C Scope of activity
- D Lobbying Method (independently or through an intermediary)
- E Lobbyists





# AUSTRIA

The Austrian lobbying and interest representation law (das Österreichische Lobbying- und Interessenvertretungs-Transparenz-Gesetz) <sup>13</sup> has been in force since January 1, 2013 <sup>14</sup>. It includes the establishment of a mandatory lobbying register where organizations are obliged to register before conducting any lobbying activities. The inclusion into the register requires, among others, providing information of the names and date of births of the acting lobbyists, and, the address of the organization (in case of their employment) and a short description of its activities as well as the information on the number of lobbying commissions and the achieved results within 9 months after the end of the financial year. Companies employing in-house lobbyists are further required to indicate whether their expenditures on lobbying activities exceed 100,000 Euros <sup>15</sup>.

Name: **Lobbying- und Interessenvertretungsregister**

Coverage: National

Responsible authority: Ministry of Justice

Date of adoption: Austrian Bundesrat passed Transparency package on 28.06.2012, it took effect on January 1, 2013

URL: <http://www.lobbyreg.justiz.gv.at>

Language of the register: German

Scope of coverage: Mandatory registration for conducting lobbying activities is required for 4 groups

- ▶ Lobbying companies
- ▶ Companies that employ corporate lobbyists, provided no more than 5% of their time are used for lobbying activities.
- ▶ Self-governing bodies
- ▶ Interest groups

Excluded from joining the register:

- ▶ Political parties and party-affiliated organizations
- ▶ Statutory social security institutions
- ▶ Recognized religious communities
- ▶ The Austrian Association of Municipalities and the Association of Austrian Towns and Cities
- ▶ Interest groups, which do not employ staff for lobbying purposes.

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<sup>13</sup> TI Austria (2014): Lobbying in Austria.  
URL: <https://www.ti-austria.at/wp-content/uploads/2016/01/Lobbying-in-Austria.pdf>

<sup>14</sup> [https://www.parlament.gv.at/PAKT/VHG/XXIV/I/I\\_01465/index.shtml](https://www.parlament.gv.at/PAKT/VHG/XXIV/I/I_01465/index.shtml)

<sup>15</sup> [https://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA\\_2012\\_I\\_64/BGBLA\\_2012\\_I\\_64.pdf](https://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2012_I_64/BGBLA_2012_I_64.pdf)

Structure and accessibility of register: ▶ The public can gain access to selected information, such as the name of the registered companies (a), lobbying firms and lobbyists registered for the respective companies (b). As to self-governing bodies (c) and interest groups (d), the only accessible information is the name of the registered organization.

Most of the relevant information, however, remains unavailable to the public: these include figures on lobbying expenditure - even in those cases where they are reported by the respective institutions - as well as information on the contact and relationships between lobbyists and officials.

▶ Search can be carried out by company name or with specific information such as company registration number or name of lobbyist. Users can also list the companies alphabetically or by registration department. An online user guide is available, but only the German language is supported. There is no possibility of downloading the register's information as a dataset; it can only be viewed online.

The screenshot shows the search interface of the 'Lobbying- und Interessenvertretungsregister' website. The page has a dark grey header with the 'JUSTIZ' logo and the title 'Lobbying- und Interessenvertretungsregister'. Below the header is an orange bar with the text 'Einfache Suche'. The main content area is divided into two sections. The first section is titled 'Einfache Suche' and contains a search box with the label 'Suche nach:' and a question mark icon. The second section is titled 'Veröffentlichungen seit:' and contains four date buttons: '07.04.2017', '01.04.2017', '08.03.2017', and '01.01.2013', each with a question mark icon. Below these sections is a 'Suchen' button. The left sidebar contains navigation links: 'Einfache Suche', 'Erweiterte Suche', 'Liste nach Registerabteilung', 'Liste, alphabetisch', 'Eintrag erfassen', 'Leitfaden', and 'Hinweise'. The footer contains links for 'Kontakt', 'Impressum', and 'zum Seitenanfang'.

Source: <http://www.lobbyreg.justiz.gv.at>



## CASE STUDY / AUSTRIA

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# Sberbank Europe AG

Lobbying activities of Sberbank Europe AG <sup>16</sup> is carried out directly as a subsidiary of its parent company in the Austrian market. It is a banking group of nine other subsidiary banks and it has a presence in eleven markets in Central and Eastern Europe. Sberbank Europe AG's aim is to build sustainable bridges between Russia and the European markets.

Whose interests are lobbied: Sberbank Europe AG is 100% owned by Sberbank Russia

Field of business activity: Financial services

Scope of activity: Lobbying efforts declared to be less than EUR 100,000 annually

Lobbying method: Sberbank uses in-house corporate lobbyists to conduct its lobbying activities

Lobbyists: – Alexey Bogatov (Chief Risk Officer),  
– Gerhard Randa (CEO of Sberbank Europe AG) <sup>17</sup>.

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<sup>16</sup> <https://www.sberbank.at/sberbank-europe-ag/about-us>

<sup>17</sup> Information as of 25.10.2016

## OMV Aktiengesellschaft

OMV is international integrated oil & gas company based in Vienna, which operates in the upstream and downstream business. It has a joint stake with Gazprom in the expansion of the Central European Gas Hub (CEGH), which is poised to become the largest gas hub in continental Europe in the next few years.

Whose interests are lobbied: OMV is the major partner of Gazprom in Austria. In September 2015, Gazprom and OMV signed an Agreement on main terms and conditions of an asset swap, enabling the participation of Gazprom in assets of OMV <sup>18</sup>.

Field of business activity: Energy (gas and oil)

Scope of activity: Lobbying efforts declared to be greater than EUR 100,000 annually

Lobbying method: OMV uses in-house corporate lobbyists to conduct its lobbying activities <sup>19</sup>

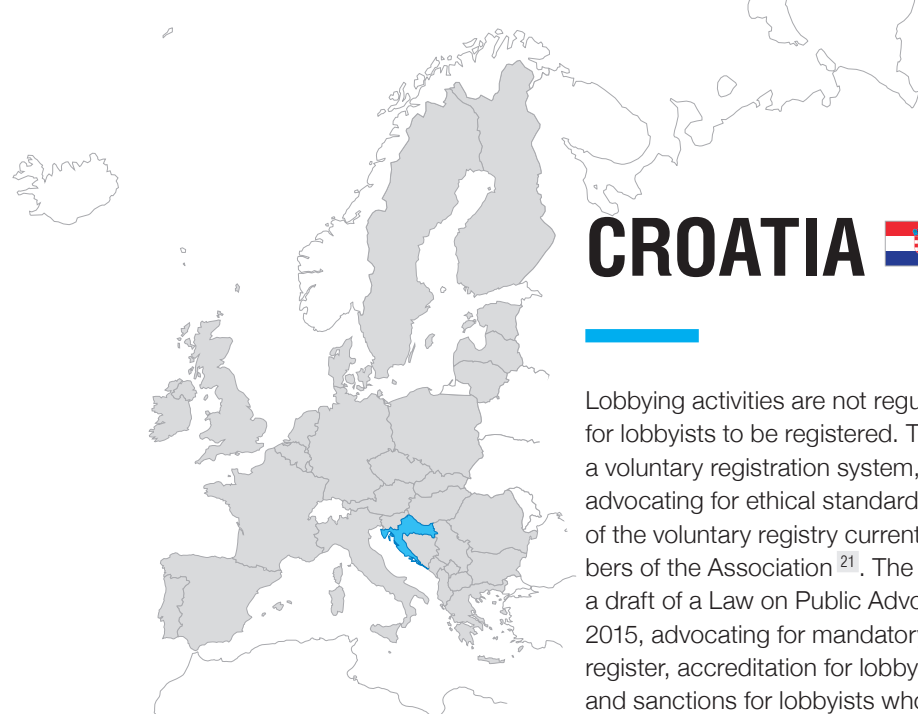
Lobbyists: – Maria Mittermair (Head of Public Affairs),  
– Michaela Jarosch (Head of Vienna Office International & Governmental Relations),  
– Ines Schneider (Head of Gas Regulatory Affairs).

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<sup>18</sup> OMV Annual Report 2015, p.4. URL: [http://www.omv.com/SecurityServlet/secure?cid=1255769898132&lang=en&swa\\_id=207522525696.05472](http://www.omv.com/SecurityServlet/secure?cid=1255769898132&lang=en&swa_id=207522525696.05472)

<sup>19</sup> <http://www.lobbyreg.justiz.gv.at/edikte/ir/iredi18.nsf/alldoc/e4565cf684d71de7c1257b39005492a6!OpenDocument>





# CROATIA

Lobbying activities are not regulated in Croatia and there is no obligation for lobbyists to be registered. The Croatian Society of Lobbyists has initiated a voluntary registration system, which aims to promote lobbying while advocating for ethical standards in the industry<sup>20</sup>. The English version of the voluntary registry currently consists of 72 individuals who are all members of the Association<sup>21</sup>. The Croatian Society of Lobbyists has introduced a draft of a Law on Public Advocacy<sup>22</sup> to the Croatian Parliament in April 2015, advocating for mandatory registration, access to officials via a public register, accreditation for lobbyists wishing to visit and influence parliament, and sanctions for lobbyists who flout the rules<sup>23</sup>.

Name: **Registar članova HDL-a**

Coverage: National

Responsible authority: Croatian Society of Lobbyists

Date of adoption: June 2008

URL: <http://hdl.com.hr/en/membership/register-of-cla-members/individual-members>

Language of the register: Croatian and English

Scope of coverage: Voluntary registration. To apply for membership in the register, applicants have to provide the name of their organization, management's point of contact, referrals of two existing members and submit their resume. Besides, upon registration they need to sign the Code of Conduct and pay an annual membership fee of 200 Euro as of now<sup>24</sup>.

Structure and accessibility of register: 

- ▶ The register is available on the association's website<sup>25</sup>. Members are listed in alphabetical order by their name and the companies or institutions they work in.
- ▶ Besides the individual membership, the association introduced the option of corporate membership in 2014. By the time of writing this report, however, the respective list did not include any entries<sup>26</sup>.

<sup>20</sup> <http://hdl.com.hr/en/about-us/who-we-are/>

<sup>21</sup> <http://hdl.com.hr/en/membership/register-of-cla-members/> The Croatia version had 6 members less: <http://hdl.com.hr/clanstvo-u-hdl-u/registar-clanova-hdl-a/fizicke-osobe/>

<sup>22</sup> [http://hdl.com.hr/wp-content/uploads/2015/05/Zakon-o-zagovaranju-interesa\\_HDL\\_prijedlog.pdf](http://hdl.com.hr/wp-content/uploads/2015/05/Zakon-o-zagovaranju-interesa_HDL_prijedlog.pdf)

<sup>23</sup> <http://hdl.com.hr/en/projects/law-on-lobbying/>

<sup>24</sup> <http://hdl.com.hr/en/membership/membership-for-individuals/>

<sup>25</sup> <http://hdl.com.hr/clanstvo-u-hdl-u/registar-clanova-hdl-a/fizicke-osobe/>

<sup>26</sup> <http://hdl.com.hr/clanstvo-u-hdl-u/registar-clanova-hdl-a/pravne-osobe/>



# CROATIAN SOCIETY OF LOBBYISTS

ASSOCIATION FOR PROMOTION OF TRANSPARENT ADVOCACY



NEWS

ABOUT US

MEMBERSHIP

PROJECTS

CSL IN THE MEDIA

LIBRARY

CONTACT

## INDIVIDUAL MEMBERS

SEMINAR ON LOBBYING

BUSINESS LUNCH

ANNUAL CONFERENCE

MAGAZINE 'THE ART OF LOBBYING'

NEWSLETTER

SURNAME ,NAME	COMPANY/NGO	FUNCTION/POSITION
Ajduk, Željko	Agencija Ajduk	
Altaras Penda, Ivor	Essa d.o.o.	
Andrić, Drago	Hrvatske ceste d.o.o. (Croatian roads LTD)	
Anić, Nikola	HPB-Nekretnine d.o.o.	
Aunedi Medek, Mario	Alpheus d.o.o	
Banelli, Marijan	Banelli d.o.o.	
Bevanda, Denis	Magra d.o.o.	
Bilandžija, Nikola	Bioplus d.o.o.	
Bolković, Romano	2u9 d.o.o.	
Bošnjak, Marijana	Kinematografi Osijek d.d.; Primavista; Total media d.o.o.	
Burić, Nada	Aion d.o.o.	
Cesar, Hrvica	Intel d.o.o.	

Source: <http://hdl.com.hr/en/membership/register-of-cla-members/individual-members/>





# EUROPEAN UNION

The EU Transparency Register was established in 2011. It was updated through an Inter-Institutional Agreement (IIA) between the European Commission (COM) and the European Parliament (EP) agreed in April 2014 and currently applies to the two institutions, under the European Transparency Initiative. Upon revision in April 2014, the EU Transparency Register, although voluntary, has grown at an average rate of 1,000 new registrants every year. As of October 2016, it includes over 10,151 registrants <sup>27</sup>, covering all types of lobbyists including corporations, self-employed individuals, in-house lobbyists, trade associations, think tanks, research and academic institutes <sup>28</sup>.

Name: **EU Transparency Register**

Coverage: European Parliament and European Commission

Responsible authority: Joint Transparency Register Secretariat (JTRS), comprising staff from EP and COM

Date of adoption: June 2011

URL: <http://ec.europa.eu/transparencyregister/public/homePage.do>

Language of the register: 23 EU languages

Scope of coverage: Registration is voluntary. However, only registered lobbyists are allowed to access legislators and the EP.

► Organizations expected to register are: consultancies; law firms; trade associations; in-house lobbyists; NGOs, think tanks, religious organizations and public authorities (local/municipal).

► Registrants are required to provide an estimate of the annual costs related to activities covered by the Transparency Register and the number of people involved in those activities, disclose any EU funding they receive as well as specify any legislative proposals they are following. The register clearly distinguishes between commercial and non-commercial organizations.

► The JTRS conducts checks to ensure accuracy and registrants who fail to update the information will be barred from the system. These tests are performed sometimes at random, sometimes due to complaints submitted by the public online.

<sup>27</sup> <http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en#en>

<sup>28</sup> <http://www.integritywatch.eu/>

- Structure and accessibility of register:
- ▶ The register is accessible for the public. It is available online and search may be carried out. As such, the information in the database can be filtered by type of organization, its representatives and according to whether they have a representation in Brussels and access to the EP.
  - ▶ A complete list of registered organizations or accredited persons can be downloaded as a spreadsheet.

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Ongoing discussions: On September 28, 2016 the European Commission presented a proposal on a mandatory Transparency Register covering all three EU institutions<sup>29</sup>. The proposal, which would imply changes to “include the Council in the system alongside the Commission and Parliament, clarify definitions, improve monitoring and introduce penalties for breaches” was subject of the debate in the Parliament’s plenary session in October 2016<sup>30</sup>.

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<sup>29</sup> <https://ec.europa.eu/transparency/regdoc/rep/1/2016/EN/1-2016-627-EN-F1-1.PDF>

<sup>30</sup> <http://www.europarl.europa.eu/news/en/news-room/20160930IPR44580/mandatory-registration-of-lobbyists-in-the-transparency-register>





## Search the register

Change my search criteria

1 - 25 of 2938

Export options: Excel Xml Pdf

1 2 3 4

Identification number:	(Organisation) name	Section	Registration date:	Head office country
145433825775-70	KulturLife g GmbH	III - Non-governmental organisations	06/02/2017	Germany
404581225774-42	Deťom s rakovinou n.o.	III - Non-governmental organisations	06/02/2017	Slovakia
563823725778-18	Local Action Group Leader 'De Kracht van Salland' (LAG Leader Salland)	III - Non-governmental organisations	06/02/2017	Netherlands
490049114088-06	European Food Information Resource (EuroFIR AISBL)	III - Non-governmental organisations	31/07/2014	Belgium
755061425995-25	Tierärztliche Vereinigung für Tierschutz e.V. (TVT)	III - Non-governmental organisations	20/02/2017	Germany
335624825812-50	Welfare Quality Network (WQN)	III - Non-governmental organisations	08/02/2017	Sweden
991624125813-01	Associazione Nazionale Italiana Dettaglianti E-cig (A.N.I.D.E.)	III - Non-governmental organisations	08/02/2017	Italy
751614225847-05	Česká společnost AIDS pomoc, z.s. (ČSAP)	III - Non-governmental organisations	12/02/2017	Czech Republic
533239525618-01	Dipartimento Europeo Sicurezza Informazioni (D.E.S.I.)	III - Non-governmental organisations	26/01/2017	Italy
044310525770-11	The Norwegian Wind Energy Association (NORWEA) (NORWEA)	III - Non-governmental organisations	06/02/2017	Norway
279607426235-10	FUNDACIÓN MENIÑOS (FUNDACIÓN MENIÑOS)	III - Non-governmental organisations	07/03/2017	Spain
941107726349-62	NEO ΙΝΣΤΙΤΟΥΤΟ ΚΑΤΑΝΑΛΩΤΩΝ (NEO INKA)	III - Non-governmental organisations	21/03/2017	Greece
440123026177-79	World Animal Net (WAN)	III - Non-governmental organisations	03/03/2017	United States
244843926243-87	Bulgarian Association of Small and Medium Enterprises (BASME)	III - Non-governmental organisations	07/03/2017	Bulgaria
407876326164-54	Aktionsbündnis gegen AIDS (AgA)	III - Non-governmental organisations	06/03/2017	Germany
561606225976-32	Barncancerfonden	III - Non-governmental organisations	12/03/2017	Sweden
767321926487-82	Federconsumatori	III - Non-governmental organisations	24/03/2017	Italy
079671126149-32	Hellenic Liver Patient Association "Prometheus"	III - Non-governmental	06/03/2017	Greece

Source: <http://ec.europa.eu/transparencyregister/public/homePage.do>

## PJSC Gazprom

PJSC Gazprom is a global energy company which is basically focused on geological exploration, production, transportation, storage, processing and marketing of gas and other hydrocarbons as well as electric power, heat energy production and distribution <sup>31</sup>.

Whose interests are lobbied: PJSC Gazprom, with its headquarters in Moscow. More than 50% of its shares belong to the Russian government.

Field of business activity: Oil and gas

Scope of activity: Annual costs related to activities covered by the register are declared to be 900,000 € - 999,999 €.

Lobbying method: Representative office, in-house lobbyists and trade/business/professional associations

Lobbyists: – Mr. Mikhail Lebedev (Head of EU Affairs Unit, Gazprom Representative office in Belgium)

## Sass Consulting AG - Communications and Strategic Relations

Sass Consulting AG provides clients with consultancy services in the area of public relations, public affairs, and reputation building and lobbying at EU level and in several countries and improves mutual understanding between political decision-makers and enterprises. The scope of its services includes, but is not limited to lobbying at EU level <sup>32</sup>.

Whose interests are lobbied: Nord Stream AG, JSC Russian Railways and JSC Rusatom Overseas et al.

Field of business activity: Consultancy services in the area of public relations, public affairs, reputation building and lobbying at EU level and in several countries

Scope of activity: Annual turnover attributable to activities covered by the register are declared to be 100,000 € - 499,999 €, out of which those related to Nord Stream AG and Russian Railways are estimated to be below 9,999 €, those of JSC Rusatom Overseas - 50,000 € - 99,999 €.

Lobbying method: Professional consultancy

Lobbyists: – Mr. Sebastian Sass (Owner/Director)

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<sup>31</sup> <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=622135013267-04>

<sup>32</sup> <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=269765512149-12>



## Brunswick Group LLP

Brunswick is an international advisory company that helps businesses and other organizations to address critical communications challenges. Brunswick Brussels office focuses on EU public and regulatory affairs, media relations, corporate reputation building and support during competition regulatory processes <sup>33</sup>.

Whose interests are lobbied: Nord Stream

Field of business activity: International advisory firm working across a broad range of policy areas

Scope of activity: annual turnover attributable to activities covered by the register are declared to be higher than 1,000,000 €, out of which those related to Nord Stream are estimated to be between 100,000 € - 199,999 €.

Lobbying method: Professional consultancy

Lobbyists: – Mr. Philippe Blanchard (Managing Partner, in charge of EU relations)

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<sup>33</sup> <http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=26255464458-25>



# FRANCE

## (NATIONAL ASSEMBLY)

**Lobbying monitoring in France is performed by means of two parallel registers operating at both houses of the Parliament - the National Assembly and the Senate.**

The Bureau of the National Assembly established the Register of lobbyists in June 2009, and the code of conduct for registered lobbyists was introduced by the Bureau on June 26, 2013 in order to ensure transparency, publicity and legitimacy of lobbying activities. Registration in the Register is voluntary only for legal entities and should be carried out in two steps: first of all, it is mandatory to create a profile on the website of the National Assembly, and after the verification, the lobbyist has to fill in a form with information about the company which he/she represents.

The “Sapin II” bill initiated in April 2016 is supposed to become the first substantial initiative in controlling lobbying activities, which will bring France into line with the highest international standards in the area of transparency and the fight against corruption..

Name: **Le registre des Représentants d’intérêts à l’Assemblée Nationale** <sup>34</sup>

Coverage: National

Responsible authority: National Assembly (Parliament)

Date of adoption: June 2009

URL: [http://www2.assemblee-nationale.fr/representant/representant\\_interet\\_liste](http://www2.assemblee-nationale.fr/representant/representant_interet_liste)

Language of the register: French

Scope of coverage: 

- ▶ Registration is voluntary for commercial companies; administrative authorities and public institutions; think tanks, research organizations and academic institutions, NGOs and civil society organizations; trade unions; consultancies and law firms, and consultants acting as independent.
- ▶ Excluded from joining the register are central authorities; local governments, political parties, individuals.

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<sup>34</sup> [http://www2.assemblee-nationale.fr/representant/representant\\_interet\\_liste](http://www2.assemblee-nationale.fr/representant/representant_interet_liste)



Structure and accessibility of register: ▶ The data in a spreadsheet is open to the public viewing on the website of the National Assembly.

Four mandatory fields are to be completed: name, type of organization, the sector in which it operates. It is compulsory to provide the link to the company's profile on the website of the National Assembly, which contains more detailed description of its activities.

▶ It contains the names of directors; names of persons engaged in lobbying activities on behalf of the company (up to five people); address and organization's contacts; target of lobbying activities (legislation, other initiatives); list of activities in which the organization has participated (round tables, public hearings, meetings with deputies); names of clients whose interests are represented by the organization; membership in associations; financial information (budget of the previous year or the financial sources and the approximate amount of money spent on lobbying in the National Assembly).

▶ The register can be sorted by organization type and by field of activity. Search by company name does not exist

The screenshot shows the website of the French National Assembly (Assemblée Nationale). The page title is "Tableau des représentants d'intérêts". There is a filter section with dropdown menus for "Secteur" and "Catégorie", and buttons for "Filtrer" and "Réinitialiser le tableau". Below the filter is a table with the following data:

Raison sociale ▲	Catégorie ▲	Secteur ▲	Fiche	Contrib. ▼
3M France	Entreprise	Défense, armement - Industrie - Santé - Sécurité - Télécommunications - Transports, logistique	⇒	
Accenture France	Entreprise	Audiovisuel et médias, économie numérique - Budget et finances publiques - Défense, armement - Santé - Sécurité	⇒	
Accompagnements institutionnels vers les Pouvoirs publics	Cabinets de consultants spécialisés	Affaires institutionnelles, vie publique - Agriculture, élevage, pêche, bois - Agroalimentaire - Artisanat - Audiovisuel et médias, économie numérique - Arts et culture - Bâtiment, travaux publics - Banque, Assurance, finances - Budget et finances publiques - Collectivités locales - Commerce, distribution - Consommation et concurrence - Coopération et Développement - Défense, armement - Droit des sociétés - Éducation, enseignement, formation - Emploi - Énergie, eau - Environnement, écologie, développement durable - Famille - Fiscalité - Finances sociales - Gouvernance - Handicap - Hôtellerie, restauration - Immobilier, habitat, logement - Industrie - Jeunesse - Justice et affaires intérieures - Politique régionale - Presse, édition - Professions libérales - Recherche et technologie - Santé - Sécurité - Sport, loisirs, tourisme - Télécommunications - Transports, logistique	⇒	

Source: [http://www2.assemblee-nationale.fr/representant/representant\\_interet\\_liste](http://www2.assemblee-nationale.fr/representant/representant_interet_liste)

## Assemblée des chambres françaises de commerce et d'industrie

The Union of Chambers of Commerce (Assemblée des chambres françaises de commerce et d'industrie) is comprised of 152 chambers at the national, regional and municipal levels, and at the international level of the 113th chambers, operating in eighty-three countries around the world <sup>35</sup>.

The Franco-Russian Chamber of Commerce (CCI France Russie) unites more than 450 members and states lobbying through the Economic Council Chamber as one of three main aims of its activities (including consultations and presentations to the French and Russian public and political figures) <sup>36</sup>.

In addition, one of the Commerce and Industry Chambers of France, Paris Chamber of Commerce in the region Ile-de-France, has its office in Moscow <sup>37</sup> and is cited as the official partner of the Franco-Russian Chamber of Commerce.

Whose interests are lobbied: Gazprombank, Sberbank CIB, MTS, Rosbank, VTB, CO-Vostok, Rosgosstrakh, and other members of the Union <sup>38</sup>

Field of business activity: Very broad, including environment, energy and industry

Scope of activity: 10 000 € in 2013 <sup>39</sup>

Lobbying method: Meetings with deputies, parliamentary hearings

Lobbyists: – André Marcon (President)  
– Jérôme Pardigon (Director of Institutional Relations)

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<sup>35</sup> <http://www.CCI.fr/Web/Organisation-du-reseau/Le-reseau-des-CCI/-/article/Le+r%C3%A9seau/La-Force-d-un-reseau-Au-Service-de-l-Entreprise>

<sup>36</sup> <http://www.ccifr.ru/ru/index.php?pid=138>

<sup>37</sup> <http://www.Entreprises.CCI-Paris-IDF.fr/Web/International/Votre-CCI-Dans-Le-Monde>

<sup>38</sup> <http://www.ccifr.ru/ru/index.php?pid=38&Title=&Membership=&Sector=>

<sup>39</sup> [http://www2.assemblee-nationale.fr/representant/representant\\_interet\\_detail/29](http://www2.assemblee-nationale.fr/representant/representant_interet_detail/29)

## Association Française Indépendante d'Électricité et du Gaz

The French independent association of electricity and gas (Association Française Indépendante d'Électricité et du Gaz, AFIEG) includes the French subsidiaries of major European operators in the field of electricity and gas, which joined the market at least 10 years ago. In total, the association represents the interests of eight companies: Alpiq, BKW, Enel, E.On, Gazprom Energy, Vattenfall, Enovos, NovaWatt.

Whose interests are lobbied: A subsidiary of "Gazprom" Gazprom Energy and other members of the association <sup>40</sup>

Field of business activity: Energy

Scope of activity: Declared to be between € 20 000 and € 30 000 in 2014 <sup>41</sup>

Lobbying method: Participation in the hearings of the Commission on energy prices monitoring; organization of meetings with deputies and distribution of information among deputies (letters, position papers) about the situation on the electricity and gas markets.

Lobbyists: – Marc Boudier (President)

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<sup>40</sup> <http://www.afieg.fr/Les-membres/>

<sup>41</sup> [http://www2.assemblee-nationale.fr/representant/representant\\_interet\\_detail/132](http://www2.assemblee-nationale.fr/representant/representant_interet_detail/132)





# FRANCE (SENATE)

The Bureau of the Senate established the Register of interest groups of Senate in October 2009 in order to comply with the requirements of transparency, ethics and justice. The main acts regulating the maintenance of the register are the rules of access to the Senate's premises and a code of conduct for representatives of interest groups in the Senate. These new regulations inaugurate a new chapter in the general instructions of the Bureau.

The Senate's lobbyists register is similar in many ways to the register of the National Assembly. The main difference, though, is that registration in the Senate's register is a mandatory condition for lobbyists who want to gain access to the Senate's premises (however, this fact does not exclude the possibility of their meeting with senators outside the Senate). Another defining feature is, that according to the code of conduct in the Senate, representatives of registered interest groups should declare an invitation sent to Senators, government officials and Senate authorities to travel overseas using the special form.

France has a voluntary system of registration. One can register by completing an online application form which can be downloaded from the website, and later this form is submitted to the Security Department of the Senate. Registration is updated annually.

Name: **Le registre des groupes d'intérêt au Sénat** <sup>42</sup>

Coverage: National

Responsible authority: The Senate (Parliament)

Date of adoption: October 7, 2009

URL: [https://www.senat.fr/role/groupes\\_interet.html](https://www.senat.fr/role/groupes_interet.html)

Language of the register: French

Scope of coverage: Voluntary for registration for commercial companies

Structure and accessibility of register: ▶ The register is open to public viewing as a downloadable Excel spreadsheet.

▶ It contains the name and the type of organization; the name of a person engaged in lobbying activities on behalf of the company (only one person should be named) and his position; list of clients whose interests are represented by the organization; registration's expiration date in the registry.

▶ Differences from the National Assembly's register:

– The exact list of organizations, which can be registered, does not exist;

– It is possible to specify only one person representing the interests of the organization;

– The register does contain neither the purpose of lobbying activities, nor the details of specific activities, in which the organization is involved in order to achieve these goals;

– Scope of lobbying expenses is undeclared.

▶ Search: ability to sort by Excel columns.

<sup>42</sup> [https://www.Senat.fr/Role/groupes\\_interet.HTML](https://www.Senat.fr/Role/groupes_interet.HTML)



# GERMANY

The German parliament 'Bundestag' has been maintaining a public list of registered organizations and their representatives since 1972. Registration is voluntary and it grants access to the buildings and allows direct contact with elected officials. In principle, lobbyists cannot conduct their activities unless they are on the register, but certain provisions of the law allow Bundestag members to extend invitations to non-registered entities to participate in drafting legislation. In October 2016, 2284 associations were registered <sup>43</sup>.

Yet, since non-registration does not necessarily prevent an organization from influencing the policymaking process, it remains unclear which lobbyists have access to the Parliament's premises.

Name: **Öffentlichen Liste über die Registrierung von Verbänden und deren Vertretern**

Coverage: National

Responsible authority: President of the German Bundestag

Date of adoption: 1972

URL: <http://www.bundestag.de/parlament/lobbyliste>

Language of the register: German

Scope of coverage: Voluntary system of registration for entities.

- ▶ Only registered organizations are granted access to buildings and Parliamentarians to carry out lobbying activities. However, Bundestag may invite representatives of non-registered organizations to present information and assist in drafting legislation.
- ▶ Individuals, corporate in-house lobbyists, lobby consultancies and law firms, which are involved in lobbying activities are exempt from registration in accordance with the current system. The same holds true for public entities and regional authorities.
- ▶ To register, Associations' members are required to disclose their name and organization represented, location of their group, composition of their Board of management and Board of Directors, number of members and names of appointed representatives.

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<sup>43</sup> <http://www.bundestag.de/blob/189476/27e98e4752447f2324bc59719dee48ee/lobbylisteaktuell-data.pdf>

Structure and accessibility of register: ► An annual publicly available list of all entities wishing to express or defend interests before the Bundestag or the Federal Government is drawn up. The document is downloadable in PDF format and it contains the address and contact details of the association, information of the management, the name of the key representatives, area(s) of interest, the number of members and the number of affiliated organizations.



## Bundesanzeiger

Herausgegeben vom  
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[www.bundesanzeiger.de](http://www.bundesanzeiger.de)

## Bekanntmachung

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Dr.rer.pol. Thomas M. Schimmel, Geschäftsführer

Interessenbereich

Interreligiöser und interkultureller Dialog;  
- wissenschaftliche Bearbeitung von Aspekten des Dialogs und der Funktion von Religion in der deutschen und europäischen Gesellschaft;  
- Eintreten für das Grundrecht und das universale Menschenrecht Religionsfreiheit (auch die negative Religionsfreiheit/Weltanschauungsfreiheit);  
- Vermittlung von Kenntnissen über alle Aspekte von Religionen und Kulturen;  
- Diskussion von Toleranz und Offenheit gegenüber anderen Religionen und Kulturen in einer demokratischen Gesellschaft;  
- der Einsatz für die Rechte bedrohter Kulturen und  
- die Förderung von Dialogkultur als friedensschaffende und integrative Maßnahme.

Mitgliederzahl

7

Anzahl der angeschlossenen Organisationen

5

Verbandsvertreter/-innen

(s. Abschnitt "Vorstand und Geschäftsführung")

Anschrift am Sitz von BT und BRg

(s. Abschnitt "Name und Sitz, 1. Adresse")

2

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E-Mail: [abda@abda.de](mailto:abda@abda.de)  
Internet: <http://www.abda.de>

Weitere Adresse

-

Vorstand und Geschäftsführung

Interessenbereich

Wahrnehmung und Förderung der gemeinsamen Interessen der in ihr zusammengeschlossenen Apothekerkammern und -vereine/-verbände, insbesondere den Meinungs- und Erfahrungsaustausch zwischen den Mitgliedsorganisationen zu vermitteln, sie zu beraten und über alle für die Apothekerschaft wichtigen Vorgänge auf dem Gebiet des Gesundheitswesens, des Arzneimittelwesens und des wirtschaftlichen und sozialen Lebens zu unterrichten, in allen Angelegenheiten von allgemeiner, über den Bereich einer Mitgliederorganisation hinausgehenden Bedeutung mit Behörden, Körperschaften, Vereinigungen, Einrichtungen und sonstigen Stellen, welche mit Fragen der Arzneimittelversorgung zu tun haben, zu verhandeln, Beziehungen zur pharmazeutischen Wissenschaft sowie zu in- und ausländischen pharmazeutischen Organisationen zu pflegen, die Zusammengehörigkeit der deutschen Apothekerschaft zu wahren und zu pflegen, auf einheitliche Grundsätze für die Tätigkeit der Apotheker in öffentlichen Apotheken, Krankenhausapotheken, Hochschulen, Industrie und Behörden, für das Apothekerwesen und den Arzneimittelverkehr sowie zu den Trägern der Sozialversicherung hinzuwirken sowie den Deutschen Apothekertag vorzubereiten.

Mitgliederzahl

34

Anzahl der angeschlossenen Organisationen

-

Verbandsvertreter/-innen

(s. Abschnitt "Vorstand und Geschäftsführung") und  
Ralf Denda

Anschrift am Sitz von BT und BRg

(s. Abschnitt "Name und Sitz, 1. Adresse")

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Vorstand und Geschäftsführung

Präsidenten:  
Prof. Dr. Reinhard F. Hüttl  
Prof. Dr. Henning Kagermann  
Prof. Dr. habil Michael Klein, Generalsekretär

Interessenbereich

acatech vertritt die Interessen der deutschen Technikwissenschaften im In- und Ausland in selbstbestimmter, unabhängiger und gemeinwohlorientierter Weise. Als Arbeitsakademie berät acatech Politik und Gesellschaft in technikwissenschaftlichen und technologiepolitischen Zukunftsfragen. Darüber hinaus hat es sich acatech zum Ziel gesetzt, den

Source: <http://www.bundestag.de/blob/189456/00aab1db13ea7fda086a19ad3641d4fa/lobbylisteamtlich-data.pdf>



## CASE STUDY / GERMANY

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# German-Russian Economic Alliance (Deutsch-Russische Wirtschaftsallianz)

The German-Russian Economic Alliance (GRWA) <sup>44</sup> is an Association representing German and Russian companies by promoting bilateral economic cooperation based on a common interest. The Association is aimed at deepening Russian-German economic partnership.

Whose interests are lobbied: those of the alliance's members: German and Russian companies with the specific aim of improving bilateral economic ties

Field of business activity: Advanced technology, aviation, medium enterprises

Scope of activity: Amount undeclared.

► Events publicity, however, indicate that GRWA receives support from various Russian organizations including Volga-Dnepr Group, Gazprom, and the Russian Academy of Sciences <sup>45</sup>

► Board member Mikhail Prokudin also serves on the senior management team of ACIG Group of Companies, which manages the assets of Russian companies such as the government-owned corporation Rusnano Group and ANCOR Group <sup>46</sup>.

Lobbying method: Collective advocacy and lobbying

Lobbyists: – Dr. Vitaly M. Shmelkov (First CEO)  
– Lutz Beyer (Second CEO)  
– Manfred Klotz (Treasurer)  
– Julia Bondarenko  
– Mikhail Prokudin

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<sup>44</sup> <http://www.deruwia.de/de/Home/>

<sup>45</sup> <http://www.deruwia.de/rus/events/>

<sup>46</sup> [http://www.acig.ru/en/heads\\_of\\_directions.php](http://www.acig.ru/en/heads_of_directions.php)

## CASE STUDY / GERMANY

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# Zukunft ERDGAS e.V / Future NATURAL GAS

Zukunft ERDGAS e.V is a German association that lists German-based Russian companies among its members. It is an initiative of German gas industry, which promotes industrial use of natural gas to reach the full economic potential and possibilities for its future usage.

Whose interests are lobbied: Those of all members (including Russian companies)

Field of business activity: Natural gas

Scope of activity: Amount undeclared.  
Zukunft Erdgas e. V. lists some Russian companies as its members such as Gazprom Germania GmbH as well as Wingas GmbH <sup>47</sup>, a wholly owned subsidiary of Gazprom <sup>48</sup>.

Lobbying method: Collective advocacy and lobbying

Lobbyists: – Thomas Bareiß (MP, Coordinator for Energy Policy)  
– Dr. Timm Kehler (CEO)  
– Timo Vehrs (Supervisory Board member, Director of Business at Gazprom Germania GmbH)

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<sup>47</sup> <https://www.zukunft-erdgas.info/zukunft-erdgas/mitglieder>

<sup>48</sup> <https://www.wingas.com/en/company/about-wingas/shareholder.html>

## INFORMAL LOBBYING IN GERMANY / GERMANY

### The Case of Andrey Bykov

When in September 2012, it went public that several German energy companies were using Russian uranium from military stocks to produce energy, this case also revealed the information about Russian lobbyist's involvement in the deal, whose name was Andrey Bykov.

Initially, no one in the German government appeared to remember him, but later it became obvious that Bykov had had close contacts with the German government officials<sup>49</sup>. The lobbyist was sitting at the table when highly sensitive German-Russian disarmament issues were on the agenda.

To be more precise, due to the repeated requests from opposition parties, the German government had to admit that Bykov, in 2008 and 2009, had two conversations with a person, who was Head of a Department at the Federal Ministry of Finance at that time. One of the meetings took place at the ministry. As stated in the declaration of the German government, there were no protocols of the respective meetings. Moreover, Bykov participated in talks with Bernd Pfaffenbach, former Undersecretary of State, on the disarmament of Russian nuclear submarines with the Andrej Malyshev, the then Deputy Head of the Russian nuclear agency Rosatom<sup>50</sup>. The negotiations were held at the Ministry of Economy in November 2006.

During the negotiations on disarmament in 2006, the agenda included not only the 500-million deal on nuclear submarines, but also the planned cooperation between German and Russian companies on the shutdown of nuclear power plants and the monitoring and control of nuclear material, as the statement for the German newspaper *Süddeutsche Zeitung* ran. Apparently, Bykov was not only active in questions of nuclear safety: according to him, he has also tried to exert influence on the German policy in the area of nuclear energy.

The Russian lobbyist claims to have drawn the Federal Ministry of Finance's attention to a potentially critical deal: the German "Energiewerke Nord Group", a company specializing on disarmament and shutting down of nuclear power plants, was running the risk of being sold to the French Nuclear Coup Areva. Apparently, Moscow wanted to avoid French influence in this project<sup>51</sup>.

<sup>49</sup> <http://www.Sueddeutsche.de/Wirtschaft/geschaefte-MIT-moskauer-Atom-lobbyist-Bundesregierung-gesteht-direkten-Kontakt-Zu-bykow-Ein-1.1552459>

<sup>50</sup> <http://dipbt.Bundestag.de/dip21/btd/17/119/1711922.pdf>

<sup>51</sup> <http://www.Sueddeutsche.de/Wirtschaft/geschaefte-MIT-moskauer-Atom-lobbyist-Bundesregierung-gesteht-direkten-Kontakt-Zu-bykow-Ein-1.1552459>



## The Case of Wingas

In October 2006, it leaked out that quite a few of employees of some German enterprises and employer's associations were working in German Federal and state Ministries.

Wingas, a 1993 founded strategic alliance between the Russian energy company Gazprom and Wintershell, as well as a subsidiary of the German chemical company BASF, was part of the "task force Netzzugang" of the Federal Ministry of Economics and Technology from April 2001 to September 2003<sup>52</sup>. The 'task force Netzzugang' was supposed to assist the gas and electricity regulators in identifying existing restraints of competition and mediating in case of conflict between network owners and new suppliers.

The participants of the task force had access to the drafts of a monitoring report on the state of competition in the electricity and gas market, which served the members of parliament as an informational basis while voting on an amendment to the Energy Industry Act<sup>53</sup>. Consequently, Wingas had the possibility to influence the regulation in the electricity and gas market, which was the subject of the task force. Wingas participated in the task force with one employee and provided support and professional consultations on specific economic and technological questions and by writing information brochures. Throughout this process, the Wingas employee gained an insight into confidential documents of the authorities<sup>54</sup>.

Two years after these revelations, the German government took several steps to regulate the access of lobbyists to Ministries and avoid inclusion of 'external employees' working on draft legislative acts<sup>55</sup>.

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<sup>52</sup> <http://dip21.bundestag.de/dip21/btd/16/037/1603727.pdf>

<sup>53</sup> [https://lobbypedia.de/wiki/WINGAS#cite\\_note-adamek57-1](https://lobbypedia.de/wiki/WINGAS#cite_note-adamek57-1)

<sup>54</sup> [http://www.lobbypedia.de/index.php/Lobbyisten\\_im\\_Bundesministerium\\_f%C3%BCr\\_Wirtschaft\\_und\\_Technologie#WINGAS](http://www.lobbypedia.de/index.php/Lobbyisten_im_Bundesministerium_f%C3%BCr_Wirtschaft_und_Technologie#WINGAS)

<sup>55</sup> [http://www.verwaltungsvorschriften-IM-Internet.de/bsvwvbund\\_17072008\\_04013300111.htm](http://www.verwaltungsvorschriften-IM-Internet.de/bsvwvbund_17072008_04013300111.htm); [http://www.lobbypedia.de/wiki/Lobbyisten\\_in\\_Ministerien#Die\\_politische\\_Debatte\\_und\\_die\\_neue\\_Verwaltungsvorschrift](http://www.lobbypedia.de/wiki/Lobbyisten_in_Ministerien#Die_politische_Debatte_und_die_neue_Verwaltungsvorschrift); [http://www.lobbypedia.de/wiki/Lobbyisten\\_in\\_Ministerien#Die\\_politische\\_Debatte\\_und\\_die\\_neue\\_Verwaltungsvorschrift](http://www.lobbypedia.de/wiki/Lobbyisten_in_Ministerien#Die_politische_Debatte_und_die_neue_Verwaltungsvorschrift)



# IRELAND

The lobby register is maintained according to the Standards of Public Office Commission, SIPO. If necessary, the Commission has the right to investigate the violation of law. The legal basis for setting up the register was Regulation of Lobbying Act 2015 signed by the President of Ireland Michael Higgins

Name: **The Register of Lobbying**

Coverage: National

Responsible authority: Standards in Public Office Commission

Date of adoption: March 2015

URL: <https://www.lobbying.ie>

Language of the register: English, Irish

Scope of coverage: Free to public, online website<sup>56</sup>. Registration is mandatory for:

- ▶ Companies employing more than 10 people
- ▶ Representative bodies, with at least one paid employee who carries out communication with authorities on behalf of the members of the representative body
- ▶ Third parties, lobbying for a fee on territorial development and land division.
- ▶ Compulsory updates every three months

Structure and accessibility of register: an online search engine allows to refine your search by date, organization type, fields of activity (32 options), public authority, civil servant, and others. Excel or RSS formats are available.

- ▶ Lobbyist's report should include: the name of the company or name of the individual; address and contact details; scope and "influence" of legal entities and individuals; the registration date and the date of last update; period in which active; names of related officials; expected results (success/failure); data on how advanced and other interests.

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<sup>56</sup> <https://www.lobbying.ie/>

HOME / SEARCH

**Search returns**

QSearch

Enter organisation, DPO or subject

Dates >

Relevant Matter >

Public Policy Area >

Lobbying Organisation >

Designated Public Official >

**Search Q**

**11216 Returns** [CSV Export](#) [RSS Feed](#)

(46 milliseconds)

**Clarecare Ltd.**  
[lobbying.ie/return/14720/clarecare-ltd](http://lobbying.ie/return/14720/clarecare-ltd)  
 Published 14 Apr, 2017 Nil Return

**Family Life Services Ferns Limited**  
[lobbying.ie/return/14719/family-life-services-ferns-limited](http://lobbying.ie/return/14719/family-life-services-ferns-limited)  
 Published 14 Apr, 2017 Nil Return

**Transgender Equality Network Ireland**  
[lobbying.ie/return/14716/transgender-equality-network-ireland](http://lobbying.ie/return/14716/transgender-equality-network-ireland)  
 Published 13 Apr, 2017

SPECIFIC DETAILS	PUBLIC POLICY AREA	RELEVANT MATTER
Lobby for the introduction of healthcare pathways for transgender people	Health	Matters involving public funds

**Transgender Equality Network Ireland**  
[lobbying.ie/return/14715/transgender-equality-network-ireland](http://lobbying.ie/return/14715/transgender-equality-network-ireland)  
 Published 13 Apr, 2017

SPECIFIC DETAILS	PUBLIC POLICY AREA	RELEVANT MATTER
Gender Recognition Amendment Bill	Social Protection	Legislation

**Transgender Equality Network Ireland**  
[lobbying.ie/return/14714/transgender-equality-network-ireland](http://lobbying.ie/return/14714/transgender-equality-network-ireland)  
 Published 13 Apr, 2017

SPECIFIC DETAILS	PUBLIC POLICY AREA	RELEVANT MATTER
LGBT Youth Strategy	Children and Youth Affairs	Public policy or programme

**Order of Malta Ireland**  
[lobbying.ie/return/14713/order-of-malta-ireland](http://lobbying.ie/return/14713/order-of-malta-ireland)  
 Published 13 Apr, 2017 Nil Return

**Killarney Chamber of Tourism & Commerce**  
[lobbying.ie/return/14712/killarney-chamber-of-tourism-commerce](http://lobbying.ie/return/14712/killarney-chamber-of-tourism-commerce)  
 Published 13 Apr, 2017 Nil Return

**Irish Wheelchair Association (IWA)**  
[lobbying.ie/return/14711/irish-wheelchair-association-iwa](http://lobbying.ie/return/14711/irish-wheelchair-association-iwa)  
 Published 13 Apr, 2017

SPECIFIC DETAILS	PUBLIC POLICY AREA	RELEVANT MATTER
Senator John Dolan invited a group of disability	Justice and Equality	Legislation

**By Relevant Matter**

Statistics for the relevant period reflect the total number of returns filed by subject matter. They do not reflect the volume or extent of lobbying activity conducted for each subject or within each return.

Public policy or programme	5152
Legislation	1776
Matters involving public funds	1580
Zoning or development	627

**By Public Policy Area**

Statistics for the relevant period reflect the total number of returns filed by subject matter. They do not reflect the volume or extent of lobbying activity conducted for each subject or within each return.

Health	1398
Justice and Equality	577
Economic Development and Industry	571
Agriculture	561
Housing	495
Development and Zoning	445
Education and Training	429
Children and Youth Affairs	379
Taxation	342

Source: <https://www.lobbying.ie/app/home/search>



## CASE STUDY / IRELAND

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### Aughinish Alumina Limited

Aughinish Alumina Limited (AAL)<sup>57</sup> is RUSAL's largest alumina producer, based in Ireland. According to the register's records<sup>58</sup> AAL made a submission to the Department of the Environment, Community and Local Government (DECLG) for the revision of the EU Directive trade quotas on greenhouse gas emissions.

Whose interests are lobbied: Energy and natural resources, economic development and industry, finance, EU affairs, quota setting on CO2 emissions

Field of business activity: Aluminum production

Scope of activity: Undeclared

Lobbying method: Via a subsidiary based in Ireland - Aughinish Alumina Limited who lobbies RUSAL's interest

Lobbyists: – Sean Garland,  
– Aileen O'Connell,  
– Professional lobbyists hired to consult Department of Public Expenditure and Reform, DEPR<sup>59</sup> on the matters of uneven government funding.

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<sup>57</sup> <http://www.rusal.ru/about/30/index.php>

<sup>58</sup> <https://www.lobbying.ie/return/4739/aughinish-alumina-limited>

<sup>59</sup> <http://www.per.gov.ie/en/>



## ITALY

Italy lacks any nationwide legislation on registering lobby practices. Yet, some regions - among them Tuscany, Abruzzo and Molise- have taken the initiative to set up their own rules and regulations, and the Region of Calabria and the Region of Puglia joined them in February and June 2016, respectively <sup>60</sup>. Similar efforts have been taken by a few ministerial institutions; such as the Ministry of Economic Development which - following the Ministry of Agriculture – set up a lobby register in September 2016 for decision-making processes within the ministry itself. Earlier in 2016, the Italian Chamber of Deputies agreed on a protocol to establish a mandatory lobby register.

Ongoing discussions: As to the national level, a draft bill providing for the introduction of a lobby register including sanction mechanisms and monitoring of lobbying practices by a respective committee was presented to the Senate in April 2015. Discussion of the draft bill was scheduled for September 2016 <sup>61</sup>.

## TUSCANY

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“LR 5/2002 Norme per la trasparenza dell’attività politica e amministrativa del Consiglio regionale della Toscana” is the legal basis for the regional register of Tuscany formed by the regional assembly of Tuscany.

Name: **Registro generale dei gruppi di interesse accreditat**

Coverage: Regional

Responsible authority: Regional Assembly of Tuscany

Date of adoption: January 2002

URL: [http://econsiglio.consiglio.regione.toscana.it/webapp/commissioni\\_150529/report.php](http://econsiglio.consiglio.regione.toscana.it/webapp/commissioni_150529/report.php)

Language of the register: Italian

Scope of coverage: Registration is voluntary. Interested parties have to apply to the regional committee for accreditation. The Regional Council approves registry entries for companies organized as associations, trade unions or funds.


Moreover, all members of the organization should be governed according to general principles of democracy, agreeing with the common interest and they are liable to legal protection.

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<sup>60</sup> <http://www.ilvelino.it/it/article/2016/02/08/Calabria-Consiglio-Regionale-approva-Legge-Anti-Lobby/01fb8b0e-cec0-4555-8a07-d957571ee590/https://www.ripartefuturo.it/assets/articles/images/DDL%20Puglia.pdf>

<sup>61</sup> <http://www.senato.it/notes9/web/17lavorinewv.nsf/odgprimacommxagente/e0468f7886c01addc12580340054646d?opendocument>

Structure and accessibility of register: The register is freely available to the public on the online website. It is presented in a table format with several sections, including the company's name, physical address, e-mail as well as information about the specific sector of business activity. Depending on the respective field of business activity, the registered entities are allocated to one to four out of the existing regional committees. Further information includes the date of application and integration into the register. In October 2016, there were 137 registered entities <sup>62</sup>.

 <b>REGIONE TOSCANA</b> Consiglio Regionale						
<b>Registro generale dei gruppi di interesse accreditati</b>						
<b>Totale gruppi d'interesse accreditati: 141</b>						
<b>Ente</b>	<b>Commissioni</b>	<b>Data protocollo</b>	<b>N. pratica</b>	<b>Esito</b>	<b>N. UP</b>	<b>Data UP</b>
<b>A.G.A.T. - Associazione Guide Ambientali Toscane</b> Via Pandofini, 9 50122 Firenze aic-toscana@libero.it Sede legale: Via Assisi, 20 Firenze	Prima commissione - Affari istituzionali, programmazione, bilancio, informazione e comunicazione Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione Terza Commissione - Sanità e politiche sociali Quarta commissione - Territorio, ambiente, mobilità, infrastrutture	11/12/2003	96	positivo	17	31/05/2004
<b>A.I.C. Associazione Italiana Celiachia - Sezione Toscana</b> Via Boncompagno da Signa, 22/c 50058 Signa (Firenze) segreteria-regionale@celiachia-toscana.it	Prima commissione - Affari istituzionali, programmazione, bilancio, informazione e comunicazione Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione Terza Commissione - Sanità e politiche sociali Quarta commissione - Territorio, ambiente, mobilità, infrastrutture	31/05/2002	50	positivo	37	25/07/2002
<b>A.I.C.S. - Solidarietà Associazione Italiana Cultura e Sport</b> Viale Matteotti, 42 50132 Firenze info@aicssolidarieta.it	Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione Terza Commissione - Sanità e politiche sociali Quarta commissione - Territorio, ambiente, mobilità, infrastrutture	19/01/2006	105	positivo	49	20/06/2006
<b>A.I.M.C. Onlus Associazione Italiana per la Ricerca e la Lotta Contro le Malattie Cardiovascolari</b> Via P. da Palestrina, 119 55049 Viareggio (Lu) l.santarelli@aimconlus.org	Terza Commissione - Sanità e politiche sociali	18/06/2002	71	positivo	37	25/07/2002
<b>A.I.O.P. Associazione Italiana Ospedalità Privata Toscana</b> Via Aretina, 167/M 50136 Firenze aiop.toscana@inwind.it	Terza Commissione - Sanità e politiche sociali	29/01/2003	88	positivo	20	30/05/2003
<b>A.N.P.A.S. Associazione Nazionale Pubbliche Assiste</b> Via F. Baracca, 209/INT 50127 Firenze anpastoscana@anpastoscana.it	Prima commissione - Affari istituzionali, programmazione, bilancio, informazione e comunicazione Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione Terza Commissione - Sanità e politiche sociali Quarta commissione - Territorio, ambiente, mobilità, infrastrutture	23/05/2002	29	positivo	37	25/07/2002
<b>A.N.P.P.I.A. Associazione Nazionale Perseguitati Politici Antifascisti</b> Via Buonarroti, 13 50122 Firenze info@resistenzatoscana.com	Prima commissione - Affari istituzionali, programmazione, bilancio, informazione e comunicazione Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione Terza Commissione - Sanità e politiche sociali	23/05/2002	30	positivo	37	25/07/2002
<b>A.R.C.A.T. Toscana (Associazione Club degli alcolisti in trattamento)</b> Loc. Le Grazie Paganichino, 64 53034 Colle di Val d'Elsa (Si) info@arcattoscana.it	Terza Commissione - Sanità e politiche sociali	18/06/2002	70	positivo	37	25/07/2002
<b>A.R.C.S.T. Associazione Regionale Toscana Cooperative Servizi e Turismo</b> Via Panciatichi, 56/19 50127 Firenze info@arcst.tos.it	Prima commissione - Affari istituzionali, programmazione, bilancio, informazione e comunicazione Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione Terza Commissione - Sanità e politiche sociali Quarta commissione - Territorio, ambiente, mobilità, infrastrutture	04/06/2002	59	positivo	37	25/07/2002
<b>A.S.R.S.S.S.C. Associazione Studi Ricerche Settore Socio Sanitario Culturale</b> Via Turri, 62 50018 Scandicci (Firenze) chiarellileandro@virgilio.it	Prima commissione - Affari istituzionali, programmazione, bilancio, informazione e comunicazione Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione Terza Commissione - Sanità e politiche sociali Quarta commissione - Territorio, ambiente, mobilità, infrastrutture	29/05/2002	38	positivo	37	25/07/2002
<b>ABI "Associazione bancaria italiana" c/o Banca Toscana-ABI "C.ne reg. le</b>	Prima commissione - Affari istituzionali, programmazione, bilancio, informazione e comunicazione Seconda commissione - Sviluppo economico e rurale, cultura, istruzione, formazione	20/05/2003	91	positivo	33	04/12/2003

Source: [http://econsiglio.consiglio.regione.toscana.it/webapp/commissioni\\_150529/report.php](http://econsiglio.consiglio.regione.toscana.it/webapp/commissioni_150529/report.php)

<sup>62</sup> [http://econsiglio.consiglio.regione.toscana.it/webapp/commissioni\\_150529/report.php](http://econsiglio.consiglio.regione.toscana.it/webapp/commissioni_150529/report.php)

## Association of Russian Banks

In February 2005, the Associazione Bancaria Italiana - listed in the Tuscany register - signed a cooperation agreement with the Association of Russian Banks <sup>63</sup>. The agreement provides for the exchange of information on international financial standards, international accounting standards, banking technologies, products and services, banking and security technology <sup>64</sup>. ABI's projects include EvaBeta Russia&CIS, a risk assessment firm, and the National Bureau of Credit History <sup>65</sup>.

Whose interests are lobbied: Those of the Association of Russian Banks

Field of business activity: Banking and finance

Scope of activity: Not publicly declared

Lobbying method: Through EvaBeta <sup>66</sup> being a member of the Russian Bank Association and a project of ABI

Lobbyists: – Edouardo Narducci (President of Evabeta Italia),  
– Alexander Gorin (President of Evabeta Russia),  
– Sergei Grigorian (Managing Director).

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<sup>63</sup> <http://arb.ru/en/>

<sup>64</sup> [https://www.abi.it/DOC\\_Info/Comunicati-stampa/tmp1107876890323\\_7ABIRussia\\_8.2.2005\\_.pdf](https://www.abi.it/DOC_Info/Comunicati-stampa/tmp1107876890323_7ABIRussia_8.2.2005_.pdf)

<sup>65</sup> <http://arb.ru/org/evabeta/>

<sup>66</sup> EvaBeta lobbies on behalf of Enel Group, SKB Bank, Intesa Bank (a Russian subsidiary of Italian Itesa Group San Paolo). <http://www.evabeta.technology/--c15u1>



# AMBRUZZO

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In 2010, the Ambruzzo Regional Assembly set up a regional register to promote transparency of lobbying practices and information exchange. “Disciplina sulla trasparenza dell’attività politica e amministrativa e sull’attività di rappresentanza di interessi particolari” acts as the respective legal basis <sup>67</sup>. As of October 2016, the register listed 24 registered entities.

Name: **Registro pubblico dei rappresentanti di interessi particolari**

Coverage: Regional

Responsible authority: Regional Assembly of Ambruzzo

Date of adoption: December 2010, became effective at the end of 2012

URL: <http://www.consiglio.regione.abruzzo.it/node/136400>





Language of the register: Italian

Scope of coverage: Registration is voluntary. The interested parties have to apply to the regional committee for accreditation.

Structure and accessibility of register: The register is freely accessible to the public on the online website. It lists information according to the four sections: name and physical address of the interest group (1), its representatives (2), the particular interest they represent (3) and the recipients of the activity of interest representation (4).

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<sup>67</sup> <http://www2.consiglio.regione.abruzzo.it/leggi/lexreght/testilex/016410f.htm>

  			
<a href="#">Home</a> > <a href="#">Registro portatori di interessi particolari</a> > <a href="#">Registro pubblico dei rappresentanti di...</a>			
<input type="text" value="Ricerca all'interno del sito"/>			
<b>Registro pubblico dei rappresentanti di interessi particolari</b>			
 <a href="#">Versione stampabile</a>			
Gruppo d'interesse	Rappresentanti	Interesse particolare rappresentato	Destinatari dell'attività di rappresentanza d'interessi
<b>Abilbyte</b> <b>Associazione di volontariato di utilità socio – informatica Onlus</b> Via G. Mazzini s.n.c. 64025 Pineto (TE)	Manolo Pelusi <i>(omissis)</i>  <u>Domicilio professionale:</u> Via G. Mazzini s.n.c. 64025 Pineto (TE)	<ul style="list-style-type: none"> <li>Affari Sociali e Tutela della salute</li> </ul>	Persone diversamente abili, istituzioni, associazioni rappresentative delle persone con disabilità, aziende che operano nel mercato degli ausili
<b>ASCOM - ABRUZZO</b> Via E. Fermi, n. 1 66034 Lanciano (CH)	Angelo Allegrino <i>(omissis)</i>  Claudio Allegrino <i>(omissis)</i>  <u>Domicilio Professionale:</u> Via E. Fermi, n. 1 66034 Lanciano (CH)	<ul style="list-style-type: none"> <li>Bilancio e Affari Generali</li> <li>Agricoltura</li> <li>Industria e Commercio, Turismo</li> </ul>	Aziende o Società commerciali (settori Commercio – Turismo e Servizi); Piccole e Medie Imprese; Società Cooperative; Piccoli Imprenditori Agricoli; Coltivatori Diretti; Artigiani; Operatori del turismo; Commercianti; Rappresentanti e Agenti di Commercio, d'affari in mediazione; Tabaccai; Farmacie; Professionisti; Pensionati; Consumatori.
<b>Associazione "Autismo Abruzzo Onlus"</b> Via Colle Mancino 25b Genzano di Sassa – L'Aquila	Dario Verzulli <i>(omissis)</i>  Antonio Bencivenga <i>(omissis)</i>  <u>Domicilio Professionale:</u> c/o Casa del Volontariato sede centrale di L'Aquila Via Saragat - 67100 L'Aquila	<ul style="list-style-type: none"> <li>Bilancio e Affari Generali</li> <li>Governo del Territorio, Lavori Pubblici, Ordinamento Uffici e Enti Locali</li> <li>Agricoltura, Industria e Commercio, Turismo</li> <li>Affari Sociali e Tutela della salute</li> </ul>	Genitori, familiari e tutori di persone con sindrome autistica o disturbo dello spettro autistico
<b>Associazione Bancaria Italiana – ABI</b> Corso San Giorgio, 36 64100 Teramo	Finocchio Rocco <i>(omissis)</i>  Jacobini Gianluca <i>(omissis)</i>  <u>Domicilio professionale:</u> Corso San Giorgio, 36 64100 Teramo	<ul style="list-style-type: none"> <li>Bilancio e Affari Generali</li> <li>Agricoltura</li> <li>Politiche europee, internazionali e programmi della Commissione europea</li> </ul>	Banche ed altri associati
<b>Associazione Di Competenze Multidisciplinari</b> Corso Europa n. 29/B 66054 Vasto (CH)	Cilli Vito <i>(omissis)</i>  Viggiano Carlo <i>(omissis)</i>  <u>Domicilio professionale:</u> Corso Europa n. 29/B 66054 Vasto (CH)	<ul style="list-style-type: none"> <li>Industria e Commercio, Turismo</li> <li>Politiche europee, internazionali e programmi della Commissione europea</li> </ul>	mondo del lavoro, delle imprese e organizzazioni pubbliche e private

Source: <http://www.consiglio.regione.abruzzo.it/node/136400>



# LITHUANIA

The register 'Registruoti lobistai' is published on the Ethics Commission official website (Vyriausioji tarnybinės etikos komisija). The Sejm controls the commission. The Law on Lobbying Activities was adopted in 2000 and was amended in 2003.

Name: **Registruoti lobistai** <sup>68</sup>

Coverage: National

Responsible authority: Lithuanian National Sejm

Date of adoption: June 2000

URL: <http://www.vtek.lt/index.php/deklaravimas#lobistams>

Language of the register: Lithuanian

Scope of coverage: Lithuania's registration system only includes contract lobbyists who attempt to influence the legislative branch of government, specifically excluding both in-house lobbyists, who are considered part of a corporation's permanent staff, and non-profit lobbying organizations.

Structure and Accessibility of register: Free to public, online website, there a section "For Lobbyists" which has four subsections:

- ▶ Lobbying and regulation
- ▶ Application forms
- ▶ Lobbyist declaration
- ▶ Registered lobbyists

Lobbyists in Lithuania submit an annual report of their lobbying activities to the register. In addition to name, address, phone number and certificate number, a registered lobbyist is required to record his/her income from lobbying activities, identify objectives and aims being promoted and pinpoint his target of influence in legislation.

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<sup>68</sup> <http://www.vtek.lt/index.php/deklaravimas#lobistams>



Source: <http://www.vtek.lt/index.php/deklaravimas#lobistams>

## CASE STUDY / LITHUANIA

### Lietuvos Dujos

PJSC “Gazprom” was a major shareholder of the company Lietuvos Dujos, one of the largest Lithuanian companies in terms of natural gas imports.

Whose interests are lobbied: PJSC Gazprom

Field of business activity: Natural resource extraction, transport

Scope of activity: Undeclared

Lobbying method: Gazprom bought out major shares in Lithuanian companies - Lietuvos dujos and Amber Grid and now controls 37,06% of the shares

Lobbyists: – Viktoras Valentukevičius (gaz & oil expert)





# NETHERLANDS

The Register of lobbyists at the House of Representatives (Lobbyistenregister) was established in 2012 to enhance the transparency of its activities. Group of States Against Corruption (GRECO) suggested that the register “was introduced to curb practices of some lobbyists, who were abusing their formerly free right of access to the House of Representatives” <sup>69</sup>.

Registration in the register is voluntary. To apply for registration, lobbyists are required to send a written statement to the Security Secretariat of the House of Representatives, which enumerates objectives and goals to access to the premises of the House of Representatives, the name of the lobbyist and the list of organizations whose interests he represents.

Name: **Lobbyistenregister** <sup>70</sup>

Coverage: National

Responsible authority: The House of Representatives (der Staten-Generaal - Parliament)

Date of adoption: July 1, 2012

URL: [https://www.tweedekamer.nl/over\\_de\\_tweede\\_kamer/lobbyistenregister](https://www.tweedekamer.nl/over_de_tweede_kamer/lobbyistenregister)

Language of the register: Dutch

- Scope of coverage:
- ▶ Representatives of state institutions and public relations agencies;
  - ▶ Representatives of civil society and business organizations;
  - ▶ Representatives of municipalities and provinces.

- Structure and accessibility of register:
- ▶ The register is open to public in a downloadable PDF format.
  - ▶ It contains the name of person who is engaged in lobbying activities (only one person should be indicated); name of the organization on whose behalf a lobbyist is acting; list of companies whose interests are represented.
  - ▶ No special search options.

<sup>69</sup> GRECO, Evaluation Report Netherlands 2013, par. 49

<sup>70</sup> [https://www.tweedekamer.nl/over\\_de\\_tweede\\_kamer/lobbyistenregister](https://www.tweedekamer.nl/over_de_tweede_kamer/lobbyistenregister)



Naam	Werkzaam bij / voor	Behartigt belangen voor
W.J. Annard	Rabobank Nederland	Rabobank Nederland
R.P. Baruch	Buma/Stemra	Buma/Stemra
A.J.H. van den Berg	Vandenbergconsulting	Branchevereniging vergelijkingssites
A.H. Bosscher	Stichting Natuur en Milieu	de 12 Landschappen, Greenpeace Nederland, IUCN Nederlands comité, IVN Nederland, Landschapsbeheer Nederland, Milieudefensie, Natuur&Milieu, Natuur- en Milieufederaties, Natuurmonumenten, stichting De Noordzee, Stichting Veldonderzoek Flora en Fauna, Veldwerk Nederland, Vogelbescherming Nederland, Waddenvereniging en Wereld Natuur Fonds.
C. Beex	Phoenix Interactive Partners B.V.	Brancheorganisaties aangesloten bij Zorg Poort en Jeugdpoort. o.a. KNOV, MOgroep, Actiz, KNGF)
P.H.C. Beljon	Politieacademie	Politieacademie, Gezinshuis.com, Alliantie Kind en Gezin
A. Bolomey	Nederlandse Vereniging tot Bescherming van dieren	Nederlandse Vereniging tot Bescherming van dieren
J.J. Boontjes	Koninklijke Nederlandse Beroepsorganisatie van Accountants (NBA)	Koninklijke Nederlandse Beroepsorganisatie van Accountants (NBA)
R. Bos	AEDES Vereniging van woningcorporaties	AEDES Vereniging van woningcorporaties
P.P.D. Burm	Interprovinciaal Overleg	Interprovinciaal Overleg
F.B.C. Crul	ING Nederland	ING Nederland
B.H.H. Dobbelsstein	GDF Suez	GDF Suez Energie Nederland, Cofely, Electrabel,
P.C.T. Duivenvoorde	Provincie Noord-Holland	Provincie Noord-Holland
S.R.A. van Eijk	LHV/SBF	Zorgsector, filantropie en kerken
I.D.M. Efferich-Rodenburg	Unie van Waterschappen	Unie van Waterschappen
H. Engelenburg	Vereniging van de Nederlandse Chemische Industrie (VNCI)	
M.M.R. Feith	Federatie Nederlandse Levensmiddelen	o.a. DSM, AKZO, DOW, BASF, Shell 450 levensmiddelenproducenten en 19 branches. O.a. Unilever, Friesland Campina, Heineken Nestlé, Mars, Coca-Cola, The Greenery, Cosun, VION, Pepsico en een grote hoeveelheid aan MKB-bedrijven
E.L. Figuee	Industrie (FNLI)	
M.J. Gerritsen	Universiteit Twente BPRA	Universiteit Twente BioFarmind, Dutch Vaccines Group, Pfizer, William Schrikker Groep, Nobel Biocare, Biogen Idec, Genzyme, HealthCare Platform Nederland, Abbott, Diverse Patiëntenorganisaties, Actelion, Roche, Amgen, Crucell, PPTA
P.J.H. van Gessel	Alliander Netbeheer	Alliander Netbeheer
J. Geurts	Vereniging van toezichthouders in Woningcorporaties (VTW)	Beroepsvereniging voor de Raden van Commissarissen/Raden van Toezicht
H. van Ginkel	Vereniging van bloemenveilingen in Nederland	Vereniging van bloemenveilingen in Nederland
R.J. Glaser	Glaser Public Affairs	Autorecycling Nederland, Stichting Volksbond Rotterdam, Reforma, v.d. Hoeven Stichting, Augeo
A.M. Goinga	PAG Consult	PAG Consult
G.T. van de Grift	BridgeHead	Airbusgroep, BT, Manpower, NH Industries

Source: [https://www.tweedekamer.nl/sites/default/files/atoms/files/lobbyistenregister\\_29december2016.pdf](https://www.tweedekamer.nl/sites/default/files/atoms/files/lobbyistenregister_29december2016.pdf)

## CASE STUDY / NETHERLANDS

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### **GDF Suez (ENGIE Energie Nederland N.V.)**

GDF Suez has changed its name to ENGIE Energie Nederland N.V. on 1 February 2016 <sup>71</sup>, but appears in the registry under the initial name. ENGIE Energie Nederland N.V. is the subsidiary company of ENGIE Group <sup>72</sup>.

Gazprom Energy, a subsidiary of PJSC Gazprom is one of the largest suppliers of ENGIE Group: ENGIE's supply contracts with Gazprom Export represent about 22% of the Group's long-term supplies in Europe <sup>73</sup>.

Whose interests are lobbied: GDF Suez, Energie Nederland and its members (including Gazprom Energy <sup>74</sup>), Cofely, Electrabel.

Field of business activity: Energy

Scope of activity: Amount undeclared

Lobbying method: Through Energie Nederland

Lobbyists: – B.H.H. Dobbelstein (public relations agent)

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<sup>71</sup> <http://www.engie-ep.nl/en/about-us/History>

<sup>72</sup> <http://www.engie.com/en/Group-websites/>

<sup>73</sup> <http://www.engie.com/en/journalists/press-releases/gazprom-price-gas>

<sup>74</sup> <http://www.energie-nederland.nl/vereniging/leden/>



# POLAND



Poland has a national mandatory register, which operates under the auspices of the Polish Sejm. The Act on Legislative and Regulatory Lobbying was adopted on 7 July 2005 <sup>75</sup> on the basis of the principle of transparency of lobbying activities in the legislative process. It has been amended in 2011.

Name: **Rejestrem**

Coverage: National

Responsible authority: Ministry of Internal Affairs & Administration

Date of adoption: 7 July 2005, came into force on 7 March 2006 and was amended in 2011

URL: <http://www.sejm.gov.pl/Sejm8.nsf/page.xsp/lobbying>

Language of the register: Polish

Scope of coverage: ▶ Registration - is mandatory for all legal entities and individuals performing professional lobbying practices (25€). It refers to all lobbying activities pursued for a fee on behalf of a third party. These provisions do not cover NGOs. Access to public hearings on specific legislation is granted after the parties provide the respective ministries with declarations of their interest in the legislation. Successful registration grants the entities access to the Sejm premises.

▶ Relatedly, public authorities (not individual parliamentarians) are required to publish all current information about professional lobbying activities targeted at them in the Public Information Bulletin.

Structure and accessibility of register: The register is publicly accessible in the form of a database - downloadable as a PDF file where the entities are listed up in the alphabetical order. The information includes company's name, registered office and address of entrepreneurs who are professionally engaged in lobbying, or the name and address of an individual who carries out professional activities in the field of lobbying.

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<sup>75</sup> <http://www.sejm.gov.pl/Prawo/lobbying/kon12.htm>



**Tabela 1. Podmioty uprawnione w 2015 r. do prowadzenia zawodowej działalności lobbingsowej na terenie Sejmu – lobbyści**

Lp.	Nazwa / Nazwisko i imię	Nr rejestru	Osoby, którym wydano karty wstępu	Podmiot, na rzecz którego wykonywano zawodową działalność lobbingsową	Uwagi
1.	Baran Wiktor	00241	Baran Wiktor	Fundacja „Sławek”, ML Property, PCHW s.c. – Polskie Centrum Handlu z Wietnamem, COOP, WB Investments Sp. z o.o., VIA del Cro Development Sp. z o.o.	
2.	Cabaj Kotala Doradztwo Podatkowe Sp. z o.o.	00345	Buda Paweł Kotala Wojciech	Krajowa Izba Biopaliw	Paweł Buda i Wojciech Kotala nie odebrali przepustek.
3.	DLA Piper Wiater Sp. k.	00247	Buda Paweł Kotala Wojciech Matyka Marcin	Związek Importerów i Producentów Sprzętu Elektrycznego i Elektronicznego Branży RTV i IT (ZIPSEE), Śląski Związek Gmin i Powiatów	Paweł Buda, Wojciech Kotala i Marcin Matyka nie odebrali przepustek.  Paweł Buda i Wojciech Kotala reprezentowali podmiot wykonujący zawodową działalność lobbingsową do 17.08.2015 r.
4.	Domański Podraza Dopierała Radcy Prawni i Adwokaci spółka partnerska	00211	Dopierała Robert	PMG PLAY Sp. z o.o.	
5.	Drastex Sp. z o.o.	00341	Jurczyński Jerzy	Chic Sp. z o.o. Sp. K, Chic Investments Sp. z o.o., Stowarzyszenie eSmoking Association	
6.	Edelman Polska Sp. z o.o.	00116	Zalewski Leszek	Fundacja „Gwiazda Nadziei”	
7.	Fundacja OPOR	00244	Karczewski Włodzimierz Zakrzewski Witold	Amatorska Służba Radiokomunikacyjna, Liga Obrony Kraju, Chorągiew Stołeczna Związku Harcerstwa Polskiego, Polski Związek Radioorientacji Sportowej, Stowarzyszenie Krótkofalowców Regionu Łódzkiego, Stowarzyszenie Sympatyków Radia MANUFATURA	
8.	Grayling Poland Sp. z o.o.	00014	Banaszewska Klara Purski Paweł  Piotrowska Emilia	Wonga PL sp. z o.o., Uber Poland sp. z o.o.;  Akademia Czerniaka	
9.	Karczewski Eugeniusz	00108	Karczewski Eugeniusz	„VIGOBUD sp. z o.o.”, „AGAD”, „PIS”, „Gospodarka Odpadami”	
10.	Kancelaria Radców Prawnych Kawczyński Korytkowska Partyka spółka partnerska	00212	Kawczyński Mariusz	Poland Fur Production Sp. z o.o., Joni Mink van Ansem Sp.j.	
11.	Lachowicz Monika	00329	Lachowicz Monika	MTL PERFECT Sp. z o.o.	
12.	Lewandowski Andrzej	00122	Lewandowski Andrzej	JTI Polska Sp. z o.o.	
13.	Medien Service	00044	Cieśliński Sławomir	Trusted Information Consulting	
14.	MSLGROUP Sp. z o.o.	00173	Jakub Olek	COMUTO SA	Jakub Olek nie odebrał przepustki.

Source: [http://www.sejm.gov.pl/lobbing/informacja\\_roczna\\_2015.pdf](http://www.sejm.gov.pl/lobbing/informacja_roczna_2015.pdf)

## Informal Lobbying of Russian businesses: Evidence from Poland

Despite the fact that the transparency register in Poland is mandatory, we have not been able to encounter any Russian company or subsidiary. This does not mean, however, that they do not operate on the Polish market: even more intriguing, we could identify three Russian firms that advocate their own interests by means of Polish subsidiaries which are not listed in any formal registers. Such practice does not only leave in the dark the type of activities and forms of influence that these companies potentially exert on Polish decision makers, but it also reveals the deficiencies of mandatory lobbying registers. We have listed below three Russian companies that illustrate the above-mentioned practice.

### Norica Holding S.a r.l.

Acron Group is one of the leading vertically integrated mineral fertilizer producers in Russia and worldwide. The Group has chemical plants in Russia and China, produces phosphate raw materials in Russia and develops potash deposits in Russia and Canada.

In Poland, Acron Group lobbies its interests through a subsidiary – “Grupa Azoty” the largest Polish and one of the largest European chemical companies, and thus is the largest gas consumer in Poland. Acron Group purchased 20% of shares, and due to the lobby efforts, a large part of the raw materials is imported from Russia.

Whose interests are lobbied:	Acron Group
Field of business activity:	Mineral fertilizer production
Scope of activity:	Undeclared
Lobbying method:	Through a subsidiary “Norica Holding” S.a r.l. (registered in Luxemburg) as well as its sub-divisions Rainbee Holdings Limited and Opansa Enterprises Limited (both registered in Cyprus) <sup>76</sup>
Lobbyists:	– Vladimir Kunitsky (President), – Oscar Walters (Senior Vice President) <sup>77</sup> .

<sup>76</sup> [http://tarnow.grupaazoty.com/files/d030aaf6/relations\\_between\\_shareholders\\_of\\_grupa\\_azoty\\_s.a.\\_-\\_norica\\_holding\\_s.a\\_r.l.\\_of\\_luxembourg.pdf](http://tarnow.grupaazoty.com/files/d030aaf6/relations_between_shareholders_of_grupa_azoty_s.a._-_norica_holding_s.a_r.l._of_luxembourg.pdf)

<sup>77</sup> [http://www.acron.ru/about\\_group/Management/](http://www.acron.ru/about_group/Management/)

## EuRoPol GAZ

In 1993, a Russian-Polish enterprise “EuRoPol GAZ” was established for financing and building a system of transit gas pipelines in Poland. The company owns the gas pipeline “Yamal - Europe” in Poland, the length of which is 684 km. Now “Gazprom” owns 48% of “EuRoPol GAZ” shares <sup>78</sup>.

Whose interests are lobbied: PJSC Gazprom

Field of business activity: Gas and gas transfer

Scope of activity: Undeclared

Lobbying method: Through a subsidiary “EuRoPolGaz” <sup>79</sup>

Lobbyists: – Evgeny Vasiukov (3rd Vice President),  
– Alexandr Medvedev (Chairman of the Supervisory Commission).

## Novatek Polska

Novatek Polska is part of OAO NOVATEK, Russia’s largest independent natural gas producer and one of the largest natural gas producers in the world. Novatek Polska deals with the distribution and supply of liquefied petroleum gas in Poland <sup>80</sup>.

Whose interests are lobbied: PJSC Novatek

Field of business activity: Supply, storage and distribution of natural gas

Scope of activity: Undeclared

Lobbying method: through a subsidiary, “Novatek Polska” <sup>81</sup>

Lobbyists: – Bratoń Dariusz Piotr (board chairman) <sup>82</sup>

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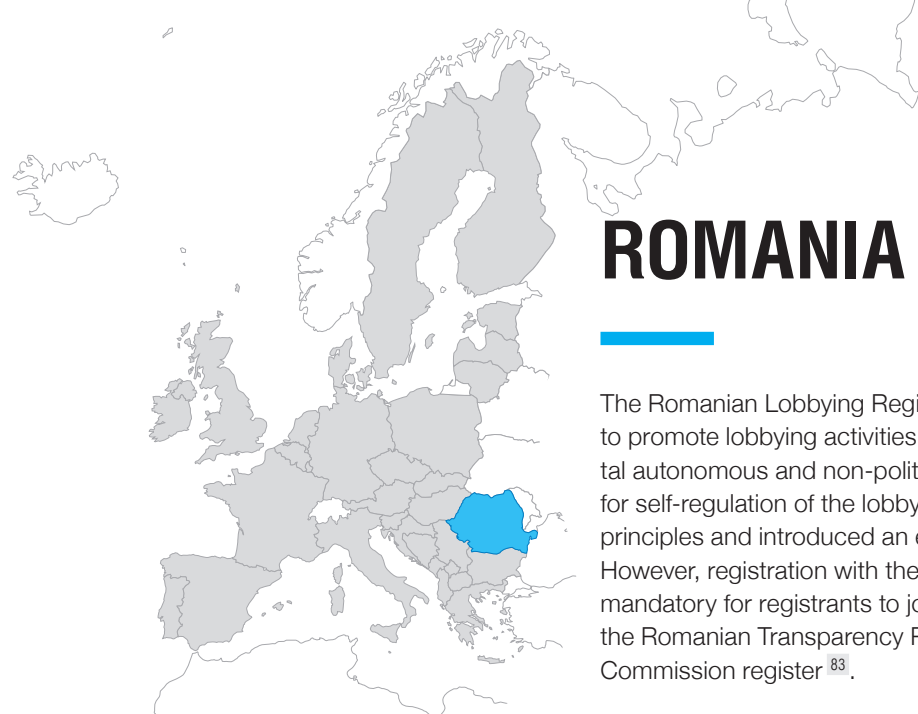
<sup>78</sup> <http://www.europolgaz.com.pl/en/company/general-information>

<sup>79</sup> <http://www.gazpromexport.ru/partners/poland/>

<sup>80</sup> <http://www.ru.novatek.pl/company/o-nas>

<sup>81</sup> <http://www.novatek.ru/ru/about/company/structure/>

<sup>82</sup> <http://www.krs-online.com.pl/novatek-polska-sp-z-o-o-krs-354954.html>



# ROMANIA

The Romanian Lobbying Registry Association (RLRA) was founded in 2010 to promote lobbying activities in Romania. It is a non-profit, non-governmental autonomous and non-political private legal organization, which advocates for self-regulation of the lobbying industry. The RLRA has adopted common principles and introduced an ethics code for the industry to adhere to. However, registration with the association is voluntary and it is not mandatory for registrants to join the Association. The RLRA runs the Romanian Transparency Registry, which is similar to the European Commission register <sup>83</sup>.

Name: **Registrul de Transparenta**

Coverage: National

Responsible authority: Romanian Lobbying Registry Association

Date of adoption: June 2010

URL: <http://www.registruldetransparenta.ro/>

Language of the register: Romanian

Scope of coverage: Registration is voluntary. Applicants are required to provide name of the organization, legal status, year of incorporation, management point of contact, indicate type of organization (e.g. NGO, law firm etc.), areas of interests, levels of interest, and declare lobbying activities conducted in the previous year <sup>84</sup>.

The following entities are excluded from joining the register:

- ▶ Political parties and affiliated organizations
- ▶ Religious groups
- ▶ Towns and municipalities which do not employ lobbying staff

Structure and accessibility of register: The register is openly available to public. It is modeled according to the European Commission's Code of Ethics Practitioners Lobby and Advocacy, and it is possible to search by filtering companies in the alphabetical order or by selecting the organization's name.

<sup>83</sup> <http://registruldlobby.ro/en/about-the-registry.html>

<sup>84</sup> <http://www.registruldetransparenta.ro/>





## Consulta Registrul de Transparență

Filtrare după prima literă: [A](#), [B](#), [C](#), [D](#), [F](#), [G](#), [I](#), [J](#), [L](#), [M](#), [N](#), [O](#), [P](#), [R](#), [S](#), [T](#), [U](#),

Filtrare după tip organizație:

### ANDERSON Consulting

Tipul organizației: **consultanți în afaceri publice (persoane fizice)**

I am the Chairman & CEO at the Canadian League of Lobbyists ([www.canadianleagueoflobbyists.org](http://www.canadianleagueoflobbyists.org)), and the President & CEO of ANDERSON Consulting. We are lobbyists, and defence consultants, registered with NATO, Canada & USA.

[www.andersonconsulting.info](http://www.andersonconsulting.info)

Pers. de contact: **Mr. Ed Anderson, President & CEO**

[mai multe detalii >>](#)

### Asociația CEDRU - Centrul de Excelență pentru Dezvoltarea Resurselor Umane

Tipul organizației: **organizații neguvernamentale**

[www.cedrudolj.ro](http://www.cedrudolj.ro)

Pers. de contact: **Dna. Mihaela Brumar, Președinte**

[mai multe detalii >>](#)

### Asociația Antiparkinson

Tipul organizației: **organizații neguvernamentale**

Asociația s-a afiliat la organismele interne și internaționale devenind membru cu drepturi depline a Asociației Bolilor Rare România, European Parkinson's Disease, etc fiind invitată și participând la congrese interne și internaționale. Totodată Asociația a fost acreditată de Auto ...

[www.antiparkinson.home.ro](http://www.antiparkinson.home.ro)

Pers. de contact: **DI. Raican Dan, președinte**

[mai multe detalii >>](#)

### ASOCIATIA CARMEN

Tipul organizației: **organizații neguvernamentale**

International Award for Young People reprezintă un program atractiv de dezvoltare personală, disponibil tuturor tinerilor cu vârsta cuprinsă între 14 și 25 de ani, care urmărește să înzestreze tinerii cu abilități de viață pentru a produce o schimbare benefică pentru ei înșiși, pent ...

[www.camyimobiliare.webgarden.ro](http://www.camyimobiliare.webgarden.ro)

Pers. de contact: **Dna. COSTAN MIHUT CARMEN, JURIST**

[mai multe detalii >>](#)

Source: <http://www.registruldetransparența.ro/consulta-registrul.html>



# SLOVENIA

The Slovenian Register of Lobbyists was established as part of the implementation of the Integrity and Prevention of Corruption Act (ZIntPK) in 2010, and it is mandatory for all professional lobbyists to register before carrying out any lobbying activities. To be eligible to register, the lobbyist must not be a public servant, he or she must be legally capable of signing contracts, and have no criminal record of six months. In addition, public officials are not allowed to pursue lobbying for a period of two years after leaving their previous public appointment <sup>85</sup>.

Name: **Register lobistov**

Coverage: National

Responsible authority: Commission for the Prevention of Corruption

Date of adoption: June 5, 2010

URL: <https://www.kpk-rs.si/en/lobbying/register-of-lobbyists>

Language of the register: Slovenian & English

Scope of coverage: Registration is mandatory. Applicants are required to provide their tax ID number, registered address, name of company or interest group, and areas of interest.

Structure and accessibility of register: The register is available for public access in form of a downloadable PDF file. This allows gathering information on all information available on the lobbyists except for tax ID number. The register can only be filtered by the area of interest.

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<sup>85</sup> [http://www.transparency.si/Images/publikacije/lobiranje/report\\_lobbyingslovenia.pdf](http://www.transparency.si/Images/publikacije/lobiranje/report_lobbyingslovenia.pdf)

COMMISSION FOR THE PREVENTION OF CORRUPTION

SLO REPUBLIKA SLOVENIJA

FAQ / CONTACT Search

THE COMMISSION | PREVENTION | ENFORCEMENT | LOBBYING | PROJECT TRANSPARENCY | LEGISLATION AND REPORTS

LOBBYING

Register of lobbyists

Home / Lobbying / Register of lobbyists

Register of lobbyists

all areas Search

Pos. number	Name and surname	Scope of	details
1	Andrej Steklasa	Other,	
2	Andrej Drapal	Agriculture, Audiovisual and media, <a href="#">more...</a>	
3	Boris Matič	Budget, Competition, <a href="#">more...</a>	
4	Nevena Tea Gorjup	Agriculture, Audiovisual and media, <a href="#">more...</a>	
6	Primož Šporar	Employment and social affairs , Enlargement, <a href="#">more...</a>	
7	Aleksander Katulus Vidmar	Agriculture, Audiovisual and media, <a href="#">more...</a>	
8	Mihael Cigler	Agriculture, Audiovisual and media, <a href="#">more...</a>	
9	Gregor Makuc	Economic affairs , Health Care,	

Source: <https://www.kpk-rs.si/en/lobbying/register-of-lobbyists/>

## CASE STUDY / SLOVENIA

### Geoplin d.o.o. Ljubljana

Geoplin d.o.o. Ljubljana is Gazprom Export's partner in the Slovenian market and the country's largest importer of natural gas. It has an ongoing agreement with Gazprom to supply 830 million cubic meters of gas annually to Slovenia till 2018 <sup>86</sup>.

Whose interests are lobbied: PJSC Gazprom

Field of business activity: Supply, storage and distribution of natural gas

Scope of activity: Undeclared

Lobbying method: High-level meetings took place between Gazprom and the Slovenian government in 2013 <sup>87</sup>

Lobbyists: – Alexei Miller, Chairman of Gazprom,  
– Alenka Bratušek Slovenian Prime Minister.

<sup>86</sup> <http://www.gazpromexport.ru/en/partners/slovenia/>

<sup>87</sup> <http://www.novatek.ru/ru/about/company/structure/>



# SPAIN

The register was set up in 2016 by the Presidential Resolution on the National Commission of the Market and Competition “Resolución del Presidente sobre la buena praxis en las relaciones de la Comisión Nacional de los Mercados y la Competencia con agentes externos”<sup>88</sup>. The register has been created to increase the transparency of the Commission activities. Registration can be carried out online on the website of the National Commission by filling in a special form.

Name: **Registro de Grupos de Interés de la Comisión Nacional de los Mercados y la Competencia**

Coverage: National

Responsible authority: National Commission on markets and competition

Date of adoption: February 24, 2016

URL: <https://rgi.cnmec.es>

Language of the register: Spanish

Scope of coverage: Access: voluntary for:

- ▶ Category I. Consulting services:
  - a). Consulting firms; b). Law offices; c). Independent consultants
- ▶ Category II. The private sector and professional associations:
  - a). Companies and groups of companies; b). Public organizations;
  - c). Business and trade unions; d). Other organizations: Events management organizations, Media.
- ▶ Category III. NGO: a). Foundations and associations; b). Coalitions, temporary associations and other forms of collective non-profit activities
- ▶ Category IV. Research: a). Independent think tanks and academic institutions; b). Think tanks and research institutions associated with political parties, business organizations and trade unions.
- ▶ Category V. Other organizations

Structure and accessibility of register: ▶ Open to public viewing.

- ▶ It contains the name of organization, its contact information and directorship; name of person engaged in lobbying activities on behalf of the organization; goals and objectives of the organization or its customers; the field of the organization’s interests.
- ▶ Search: by name and by type of organization.

<sup>88</sup> [https://rgi.cnmec.es/pdfs/resolucion\\_creacion\\_rgi.pdf](https://rgi.cnmec.es/pdfs/resolucion_creacion_rgi.pdf)

## Registro de Grupos de Interés

Los ciudadanos pueden y deben esperar que el proceso de toma de decisiones de la CNMC sea lo más transparente posible. Cuanto mayor es la apertura, más fácil resulta garantizar una actuación equilibrada y evitar presiones abusivas y el acceso ilegítimo o privilegiado tanto a la información como a los responsables de la toma de decisiones.

La CNMC tiene claro que sólo mostrando todo lo que hace, y, una vez respetadas las limitaciones que por Ley debe salvaguardar, merecerá la legitimidad que busca y, lo que es más importante, la confianza de la sociedad en esta Institución. La transparencia es, por tanto, un elemento clave para fomentar la participación activa de los ciudadanos en la defensa de la competencia y de una regulación económica eficiente.

El Registro de Grupos de Interés se ha creado para dar respuesta a preguntas básicas como qué intereses se persiguen y quién los defiende.

[Búsqueda en el Registro](#)
[Darse de alta en el Registro](#)

### Punto de mira

Incorporaciones más recientes:

Nombre	Fecha de inscripción
ASOCIACION EMPRESARIAL DE PROVEEDORES CIVILES DE TRANSITO AEREO DEL MERCADO LIBERALIZADO - APCTA	31/03/2017 - 11:50
FEDERACION NACIONAL DE ASOCIACIONES PROVINCIALES DE EMPRESARIOS DETALLISTAS DE PESCADOS (FEDEPESCA)	30/03/2017 - 09:19
Servei d'Atenció a la Dependència Sant Joan de Déu. Fundació Privada	28/03/2017 - 13:21
ANAC- ASOCIACIÓN NACIONAL DE AGENCIAS DE COLOCACIÓN	22/03/2017 - 15:46
JOSE PEREZ ROMERO	16/03/2017 - 10:59
Uber Systems Spain SL	13/03/2017 - 14:46
AGRUPACION ESPAÑOLA DE VENDEDORES AL POR MENOR DE CARBURANTES Y COMBUSTIBLES	09/03/2017 - 14:05
MENCIA & ASOCIADOS - ABOGADOS	09/03/2017 - 11:41
ANAIP (ASOCIACION ESPAÑOLA DE INDUSTRIALES DE PLASTICOS)	06/03/2017 - 10:04
Confederación Española de la Pequeña y Mediana Empresa	03/03/2017 - 13:04

### Estadísticas

II. Sector empresarial y de base asociativa	223
Asociaciones profesionales, empresariales y sindicales	177
Empresas y grupos de empresas	39
Corporaciones de derecho público	9

Source: [https://rgi.cnmec.es/pdfs/resolucion\\_creacion\\_rgi.pdf](https://rgi.cnmec.es/pdfs/resolucion_creacion_rgi.pdf)



## CASE STUDY / SPAIN

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# EDELMAN SPAIN S.A.

Edelman is a communications agency, which assisted Alfa Group and LetterOne from November 2013 to February 2015. Mikhail Fridman is one of the main shareholders and AlfaGroup Chairman of the Supervisory Board, as well as one of the founders of LetterOne<sup>89</sup>.

Whose interests are lobbied: Alfa Group Consortium

Industry: Oil and gas, commercial and investment banking, asset management, insurance, retail trade, telecommunications, water utilities

Scope of activity: Amount undeclared

Lobbying method: By contracting the professional communications agency – EDELMAN SPAIN S.A.<sup>90 91 92</sup>

Lobbyists: – Miguel Ángel Aguirre (CEO of EDELMAN SPAIN S.A)

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<sup>89</sup> <http://www.letterone.com/About-us/Leadership-and-Governance>

<sup>90</sup> <https://rgi.cnmc.es/gruposdeinteres/edelman-spain-sa-1>

<sup>91</sup> [http://www.alfagroup.org/press-centre/news/all-news/?id=7683&phrase\\_id=12802](http://www.alfagroup.org/press-centre/news/all-news/?id=7683&phrase_id=12802)

<sup>92</sup> <https://www.sec.gov/Archives/edgar/data/1023977/000092153002000587/pressrelease111202.txt>



# SPAIN (CATALONIA)

The adoption of Law 19/2014 of December 29 “On transparency and access to public information and effective management” h. 4 Art. 45 (Llei 19/2014, del 29 de Desembre, de transparència, accés a la informació pública i bon govern)<sup>93</sup> was a precondition of the registry establishment. The register was created in 2015 by the Department of Justice of the Government of Catalonia through Decree 171\2015 dated July 28, “On the Register of interest groups of the Administration of the Government of Catalonia and its public sector” (Decret 171/2015, de 28 de juliol, sobre el Registre de grups d’interès de l’Administració de la Generalitat i del seu sector públic)<sup>94</sup>. The register was set up to ensure transparency of government, recognize the broad right of public to information and increase its participation in decision-making process. Registration can be carried out by completing special lobbyist statements and declarations, which contain basic information about its activities.

Name: **Registre de grups d’interès de l’Administració de la Generalitat i del seu sector públic**<sup>95</sup>

Coverage: Regional, Autonomous Community of Catalonia

Responsible authority: Administration of the Catalan Government, Government departments and other organizations included in the Register of the public sector of the Government of Catalonia

Date of adoption: July 28, 2015

URL: [http://justicia.gencat.cat/ca/ambits/grups\\_interes/consulta\\_grups\\_interes/index.html](http://justicia.gencat.cat/ca/ambits/grups_interes/consulta_grups_interes/index.html)

Language of the register: Catalan

Scope of coverage: Access mandatory for:

- ▶ Category I. Consulting services: a). Consulting firms; b). Law offices; c). Independent consultants.
- ▶ Category II. The private sector and professional associations: a). Companies and groups of companies; b). Public organizations; c). Business and trade unions; d). Other organizations: Events management organizations, Media.
- ▶ Category III. NGO: a). Foundations and associations; b). Coalitions, temporary associations and other forms of collective non-profit activities.
- ▶ Category IV. Research: a). Independent think tanks and academic institutions; b). Think tanks and research institutions associated with political parties, business organizations and trade unions.
- ▶ Category V. Offices, networks and organizations representing churches and religious communities.

<sup>93</sup> [http://portaljuridic.gencat.cat/ca/pjur\\_ocults/pjur\\_resultats\\_fitxa/?Action=fitxa&Mode=Single&documentId=680124&Language=ca\\_ES](http://portaljuridic.gencat.cat/ca/pjur_ocults/pjur_resultats_fitxa/?Action=fitxa&Mode=Single&documentId=680124&Language=ca_ES)

<sup>94</sup> [http://portaljuridic.gencat.cat/ca/pjur\\_ocults/pjur\\_resultats\\_fitxa/?action=fitxa&mode=single&documentId=699504&language=ca\\_ES](http://portaljuridic.gencat.cat/ca/pjur_ocults/pjur_resultats_fitxa/?action=fitxa&mode=single&documentId=699504&language=ca_ES)

<sup>95</sup> [http://justicia.gencat.cat/ca/ambits/grups\\_interes/consulta\\_grups\\_interes/index.html](http://justicia.gencat.cat/ca/ambits/grups_interes/consulta_grups_interes/index.html)

- Structure and accessibility of register:
- ▶ Register is open to public viewing on the website of the Ministry of Justice.
  - ▶ It contains the name of the organization and its contact information; names of persons engaged in lobbying activities on behalf of the organization; organization goals; list of companies whose interests are represented by the organization; areas of interest; lobbying activities undertaken by the organization; officials with whom negotiations were conducted; financial information: turnover/ financial sources / list of customers / public grants received during the last year.
  - ▶ Search can be carried out by name, ID number and the name of the client organization. In addition, it is possible to search registrants by the type of the organization, area of their activity; by province, county or municipality and some other criteria.

Inici | Departament | **Àmbits d'actuació** | Tràmits | Serveis | Actualitat | Contacte

Inici > Àmbits d'actuació > Grups d'interès

## Consulta dels grups d'interès

Grups inscrits: **1810**  
Sol·licituds en curs d'inscripció: **135**

Consulta alfabètica de grups d'interès

**[ - A - B - C - D - E - F - G - H - I - J - K - L - M - N - O - P - Q - R - S - T - U - V - W - X - Z ]**

Consulta avançada de grups d'interès

**Nom del grup**

**Número d'identificador**

**Categoria**

**Subcategoria**

**Província**  **Comarca**  **Municipi**

**Àmbit d'interès**

**Tipus d'àmbit de Registre**

**Àmbit de Registre**

Si el grup és de la categoria I (Sector de serveis de consultoria i assessorament) es pot cercar per un client determinat, en nom del qual, el grup realitza les activitats registrals.

**Nom de client**

El grup manté comunicacions orals o escrites, reunions, contribucions i audiències amb autoritats i empleats públics, vinculades a l'elaboració de projectes normatius i a l'elaboració de polítiques públiques (Sí/No)

Source: [http://justicia.gencat.cat/ca/ambits/grups\\_interes/consulta\\_grups\\_interes/index.html](http://justicia.gencat.cat/ca/ambits/grups_interes/consulta_grups_interes/index.html)



# UNITED KINGDOM

The Register of Consultant Lobbyists' website operates now in the test mode. Links to pre 2015 versions of the registry are available on the website. There is an option of downloading register's records and quarterly reports in Excel format. Each registered organization has a page, where general information may be found: registered address, contact details, and date of registry, code information, lists of important people, and present and past clients.

Name: **Register of Consultant Lobbyists** <sup>96</sup>

Coverage: National

Responsible authority: Office of the Registrar of Consultant Lobbyists (ORCL)

Date of adoption: January 2014

URL: [https://registerofconsultantlobbyists.force.com/CLR\\_Search](https://registerofconsultantlobbyists.force.com/CLR_Search)

Language of the register: English

Structure: An online search engine with two sections:  
I. Consultants II. Clients

Accessibility of register: Registration mandatory for:

- ▶ Organizations which conduct the business of consultant lobbying as defined by the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 <sup>97</sup>
- ▶ Lobbyists are required to provide name, registration number and address of the companies, the names of its top-managers/partners or the name and address of the private lobbyist and tax IDs, names, and other relevant information which complies with the code of conduct.

<sup>96</sup> [https://registerofconsultantlobbyists.force.com/CLR\\_Search](https://registerofconsultantlobbyists.force.com/CLR_Search)

<sup>97</sup> <http://www.legislation.gov.uk/ukpga/2014/4/contents/enacted/data.htm>



**BETA** This is a [beta service](#) to provide feedback [take the 3 minute survey](#).

[Home](#) > [Search](#)

## Registration

An organisation must join the Register if they conduct the business of consultant lobbying as defined by the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014.

If you are required to join the Register you must first setup an account. If you already have an account you can login to submit your return or change your details.

[Login](#)

[Create account](#)

## Search the Register

[Previous Versions of the Register](#)

[Download Current Registration Information](#)

[Download Current Quarterly Lobbying Returns](#)

[Consultant Lobbyists](#) [Clients](#)

Below is a list of organisations that have joined the Register of Consultant Lobbyists. An organisation must join the Register if they conduct the business of consultant lobbying as defined by the [Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014](#)

Search for a consultant lobbyist

[Search](#)

Displaying 1-50 of 140.

[Previous Page](#) | [Next Page](#)

### Consultant Lobbyist

<i>3x1 Limited</i>	<a href="#">See profile...</a>
APCO Worldwide Ltd	<a href="#">See profile...</a>
<i>Advocate Policy and Public Affairs Consulting Limited</i>	<a href="#">See profile...</a>
Anthony Gold Solicitors	<a href="#">See profile...</a>
Aspect Consulting	<a href="#">See profile...</a>
Atlas Communications Partners Ltd	<a href="#">See profile...</a>
Bell Pottinger LLP	<a href="#">See profile...</a>
Blue Rubicon Ltd	<a href="#">See profile...</a>
Boscobel & Partners Ltd	<a href="#">See profile...</a>
Brands2Life Limited	<a href="#">See profile...</a>
Brevia Ltd	<a href="#">See profile...</a>

Source: <http://www.legislation.gov.uk/ukpga/2014/4/contents/enacted/data.htm>



# UK LOBBYING REGISTER

The UK Lobbying Register (UKLR) is a universal register of individual lobbyists and lobbying organizations. Chartered Institute of Public Relations (CIPR), the professional body for public relations practitioners in the UK, owns and controls it. The register was previously run by the UK Public Affairs Council (UKPAC), which ceased to operate in June 2015.

Name: **UK Lobbying Register (UKLR)**

Coverage: National

Responsible authority: Chartered Institute of Public Relations (CIPR)

Date of adoption: July 2015

URL: <http://www.lobbying-register.uk/>

Language of the register: English

Structure: Structure: an online search engine with three sections:

- ▶ Organizations
- ▶ Clients
- ▶ Individuals

Accessibility of register: Registration is voluntary:

- ▶ If you are employed by an agency. If you work as an in-house lobbyist, then you need to register as an individual.
- ▶ Registrants are required to provide the name of the company, its type, and address, VAT number, information about adherence to the code of conduct of any organization. Individuals must furnish the name, contact details, information about adherence to codes and place of work (if any).

## CASE STUDY / UNITED KINGDOM

### Bell Pottinger LLP

Bell Pottinger LLP's is an international full service business, specializing in corporate, financial and political communications. Gazprom EP International, a subsidiary of Gazprom has been listed among its clients<sup>98</sup> from October to December 2015. Unfortunately, there is not sufficient information in the register to draw the conclusion on which initiatives have been promoted on behalf of Gazprom.

<sup>98</sup> [https://registerofconsultantlobbyists.Force.com/CLR\\_Public\\_Profile?ID=00124000005zoGQAAY](https://registerofconsultantlobbyists.Force.com/CLR_Public_Profile?ID=00124000005zoGQAAY)

Whose interests are lobbied: Natural resources, export of gas, tariff setting, import quotas

Field of business activity: Prospecting, exploration and development of hydrocarbons outside the Russian Federation<sup>99</sup>

Scope of activity: International

Lobbyists: – James Henderson (Director of the Natural Gas Research Program)


The UK Lobbying Register (UKLR) is a register of individual lobbyists and organisations which are involved in lobbying. Although it is owned and operated by the CIPR, it is open, universal and free.


Increased scrutiny from parliament and the public mean the requirement for lobbyists to act transparently has never been greater.

Signing up to the UKLR proves to your clients, colleagues and the public that you're serious about transparency and meeting standards of ethical conduct.

Being on the UKLR means you are:

- Accountable to a recognised industry code of conduct
- Committed to conduct lobbying in plain view
- Committed to the common good of the lobbying profession

UKLR is owned and operated by  **CIPR** CHARTERED INSTITUTE OF PUBLIC RELATIONS

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Source: <http://www.lobbying-register.uk/>

<sup>99</sup> <http://www.gazprom-international.com/ru/about-us/kompaniya>

## Edelman Public Affairs

Edelman is a professional communications agency, which represented Alfa Group and LetterOne from November 2013 to February 2015. Mikhail Fridman is one of the main shareholders and is the Chairman of AlfaGroup Supervisory Board. Besides that, he is also one of the founders of LetterOne<sup>100</sup>.

Whose interests are lobbied: Oil and gas, commercial and investment banking, asset management, insurance, retail trade, telecommunications, water utilities and special situation investments

Field of business activity: Investment group; research and development of hydrocarbon fields outside the Russian Federation

Scope of activity: International

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<sup>100</sup> <http://www.letterone.com/about-us/leadership-and-governance>

# UK ASSOCIATION OF PROFESSIONAL POLITICAL CONSULTANTS

The Association of Professional Political Consultants (APPC)<sup>101</sup>, founded by 5 consultants in 1994, has its own separate register. APPC has over 80 registered members now. They publish quarterly reports. The APPC is a self-regulatory and representative body for professional political practitioners. The APPC's main role is to ensure the highest standards of honesty, integrity and professionalism amongst its members. The basis for APPC's self-regulatory regime lies in its members' adherence to the Code of Conduct and our Register.

Name: **Association of Professional Political Consultants (APPC)**

Coverage: National

Responsible authority: Self-regulatory

Date of adoption: 1994

URL: <http://www.appc.org.uk/about-us/>

Language of the register: English

Structure: An online search engine with three sections:

- ▶ One can search by name, location, countries of operation, practitioner's name or client name.
- ▶ All the archives as of 2010 are uploaded on the website in PDF format.
- ▶ Every report includes the company name; address and contact person (including contact details); country in which the activity is conducted; lists of the employees and its clients (which are divided into "paid", "unpaid" and "paid for which at that time appeared only unpaid services")

Accessibility of register: Registration is voluntary:

- ▶ Individuals and organizations that offer political consulting services relating to the UK government and its institutions
- ▶ New members are admitted by the Management Committee after submitting an application form and undergoing a personal interview

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<sup>101</sup> <http://www.appc.org.uk/about-us/>

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## The Register

Our register is a core tenet of APPC's self-regulatory regime. The [Register](#) of APPC members, their consultants and their clients is updated quarterly and is published here on our website to provide complete transparency about which clients are members are lobbying for and which in-house members are also involved in political consultancy.

[Search and view the most recent register](#)

[View all registers, going back five years](#)

Source: <https://www.appc.org.uk/register/>



## Gardant Communications

OJSC Yukos Oil Company was a client of Gardant Communications from December 1, 2010 to February 29, 2012. Neither company exists now.

Whose interests are lobbied: OJSC Yukos Oil Company

Field of business activity: Oil mining and processing

Scope of activity: International

Lobbying method: Through Gardant Communications, which was known as The Policy Partnership up to 2008, and specialized in communication services and lobbying on behalf of their clients in the parliament.

Lobbyists: – Claire Davidson (Yukos spokeswoman),  
– Joel Feyerherm (Gardant Communications Senior Associate).



## 4. CONCLUSION

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**Brussels, the city that hosts the key EU institutions, is the workplace for at least 25,000 lobbyists with a total budget of €1.5 billion a year. Only USA has more lobbyists.**

The existing system of regulatory control for EU lobbying is irregular. Only nine EU countries (Austria, France, Ireland, Lithuania, Poland, Slovenia and the United Kingdom) out of the 17 assessed by Transparency International in its EU lobbying study in 2015 had their own regulatory controls for lobbying at the time of the survey. In other countries with no relevant legislation, the lobbying practices are governed by self-regulating lobbying organizations (Romania, Croatia) or by a special decision of the highest representative authority (Netherlands, Germany). In some cases, regulatory practices for lobbying ended up in the hands of sporadic government agencies such as Italy's National Commission for Markets and Competition.

Publicly available registries of lobbyists are the key mechanism for public control over lobbyists, as well as for ensuring transparent adoption of government decisions. Such registries have been established in 12 of the 28 EU countries; in some countries there are even several registries, which often results in a conflict among law enforcers. In some countries, registries are maintained at the local level, for example, in the Italian regions of Tuscany and Abruzzo. However, meager and infrequent updating of such registries with meaningful information is the evidence of a formal approach to their management. In particular, even inside Italy, information about local registries of lobbyists is not a widely known fact.

In a number of EU countries that maintain public registries of lobbyists, the inclusion of individuals and legal entities into such databases is voluntary, which means that a number of registers have no reference of organizations actively engaged in promoting the own or their clients' interests in state bodies at the national level. A case study here would be the participation of Russian lobbyist Andrei Bykov in negotiations on deals for the use of Russian military-grade uranium for energy production by some German energy companies. Though a part to the negotiations with official representatives of German authorities, neither Bykov nor his company were included in the register of lobbyists since in Germany this is not a mandatory measure.

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**Voluntary basis of inclusion in public registers of lobbyists is a cornerstone of regulating the lobbying practices... At the national level, companies prefer not to register their lobbyists, since this has no affect on their work in any way.**

Importantly, even the publication of information on lobbyists in many public registers is, in fact, has little significance as provides no data on the subject of lobbying, whose interests are represented by a lobbyist in government bodies, what amount of compensation is received for the promotion. In this sense, the EU lobbyists register differs favorably from the most national lists: It contains much more complete information.

It should be noted that lobbying registries, same as the regulatory control of lobbying, in themselves do not guarantee transparency of lobbying practices. None of the Scandinavian countries has special legislation on lobbying and or maintains special registries of lobbyists. Yet, the high ethical standards adopted in these countries, both in the business and public sectors, serve as a reliable restraint to lobbying.

Despite the political tension between Russia and the EU countries, Russian companies are diligently promoting their own interests in the state bodies of EU countries and in the supranational institutions of the EU. Particularly vivid illustration may be given by the example of promoting the interests of JSC “Baltic Nuclear Power Plant” (a 100% subsidiary of Rosatom State Corporation) within the European Union authorities. Earlier, the construction of nuclear power plant in the Kaliningrad region was put on hold due to the lack of coordinated EU consumer markets for electricity produced by BNPP. The organization’s interests in the European Union are represented by Rumyantsev and Partners consulting group, which received in 2015 from the client from €300,000 to €400,000, according to the EU lobbyists’ registry. Despite significant amounts spent on lobbying the interests of nuclear power plant contractors, there is currently no information on defrosting the construction project. On the websites of the organizations, there is neither information about the consulting group participating in the lobbying project, nor on BNPP cooperation with the consultants to promote their own interests in the EU.

The lack of transparency in Russian companies’ decision-making on lobbying, the lack of information on finances allocated to promote the interests of Russian companies (state corporations) outside the country, creates the potential for abuse and corruption. This thesis is confirmed by another study initiated by Transparency International, the “Bribe Payers Index” - the rating of the leading exporting countries by the spread of corruption practices in international business. According to this 2011 study, Russian exporters are seen in the international business and expert environment as the most corruptly-oriented, coming at the very bottom of the ranking table.

There is a stable practice of Russian companies using their counterparties and subsidiaries to promote their own interests (Slovenia: Gazprom subsidiary Geoplin d.o.o. ; Austria: Sberbank subsidiary Sberbank Europe AG). In particular, the participation of Russian companies in public business associations such as France’s Independent Association of Electricity and Gas and the German-Russian Economic Alliance, is also a common form of promotion of interests, which are often camouflaged as public lobbying of interests of business associations..

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**Russian companies skillfully use insufficient regulation of lobbying activities in EU countries, as well as any gaps and flaws in national and international legislation. As a result, at the instigation of Russian business European countries are becoming a breeding ground for corruption practices that destroy national and international institutions. On the other hand, the nature and the financing of Russian state companies for lobbying abroad is untransparent and closed to public control. Losses are borne by the Russians and EU citizens alike.**

To address this problem, European countries are advised to adopt a more rigorous and unified system for registering lobbyists. Such system must be mandatory and include maximum information on their activities. On the other hand, Russia should develop and adopt the lobbying legislation. Such legislation should include the rules governing the lobbying actions of domestic companies (at least those with state participation) outside Russia.

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The independent non-profit organization  
Center for Anti-corruption Research and Initiatives  
“Transparency International Russia” has been included  
in the register of non-profit organizations that act  
as foreign agents by the Russian Ministry of Justice.



**CENTER FOR ANTI-CORRUPTION RESEARCH AND INITIATIVES  
“TRANSPARENCY INTERNATIONAL RUSSIA”**

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