

**Lobby transparency register complaint by Corporate Europe Observatory**  
**15 November 2017**

**Consumer Choice Center**

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=326140126649-42>

**(d) ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the register, is complete, up-to-date and not misleading; accept that all information provided is subject to review and agree to cooperate with administrative requests for complementary information and updates;**

We have several concerns with the register declaration of the Consumer Choice Center including:

1. A lack of clarity about its relationship with Students for Liberty
2. A misleading declaration regarding the sources of its funding

The only link provided by the CCC under “member organisations” points to the website page of the membership of Students For Liberty <http://www.studentsforliberty.org/europe> (an organisation which is not in the Transparency Register) and which is a US-based organisation that supports libertarian activism in universities in various countries. Further down the entry, the CCC declares itself to be a member of Students For Liberty.

It is clear that the CCC and the SFL work closely together, and are even members of each other’s organisation, but the full nature of that relationship is far from clear. SFL and CCC share the same address in the US (the CCC does not declare an address in Belgium or the EU) and also share staff members. Of those that seem active in the EU, CCC’s deputy director Yael Ossowski is also the Senior Development Officer for SFL; CCC’s European Affairs Manager and only holder of a lobbyist badge for the European Parliament Luca Bertoletti is also a development associate at SFL; and CCC’s Managing Director Fred Roeder is also SFL’s Chief Strategy Officer.

The nature of the precise relationship between CCC and SFL should be clarified and made fully transparent. Moreover, if it is established that SFL is active in the EU then it should register.

The CCC’s financial information, particularly its breakdown of financial sources, is misleading.

Firstly, CCC’s entry declares financial information for the year of 05/2015 - 04/2016, while media reports state that the organisation was only launched in March 2017. The first media coverage reported on its website is from March 2017

<https://www.consumerchoicecenter.org/category/articles/page/9/> This begs the question: what figures is CCC reporting prior to March 2017?

Secondly, in its entry, the CCC claims that its entire budget (€3,652,198 for 2015-16) arises from donations. The CCC has not provided any further information on the source of these donations, thereby creating the impression that its multi-million income comes from individuals. We consider that this is not compliant with the implementing guidelines which say that category III organisations should “state your organisation’s overall budget, broken down by main financing sources”. Far more detail should be provided for a substantial sum such as €3,652,198.

While it is not totally clear to us where CCC receives its funding from in 2017, in public events and in correspondence [https://corporateeurope.org/sites/default/files/attachments/ccc\\_email.pdf](https://corporateeurope.org/sites/default/files/attachments/ccc_email.pdf) CCC has revealed further information about its funding sources, namely that:

- its original budget came from a seed grant from Students For Liberty. In this case, Students for Liberty should be explicitly listed as a grant-maker
- it receives direct contributions from corporations, including Japan Tobacco International, which sponsored the CCC's launch event in Brussels, and which included at least one MEP as a speaker
- it receives other funding from corporations from different industries, including Fast Moving Consumer Goods, Healthcare, and Energy.

In that case, CCC appears to receive substantial funds from organisations, not just individuals, and this is wholly camouflaged by referring to funding sources only as "donations".

Overall, we consider that CCC's lobby register declaration is misleading in that it presents itself as an organisation funded by individual donations, while in fact its funding sources are not at all clear. Furthermore, its relationship with Students for Liberty is also not clear.

<https://corporateeurope.org/power-lobbies/2017/07/big-tobacco-and-right-wing-us-billionaires-funding-anti-regulation-hardliners>

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

**Was the non-compliance intentional:** It is hard to assess intention. It may be that CCC, as a newly registered organisation, has simply not correctly followed the implementation guidelines. However, even when CCC was made aware of some of our concerns in June 2017 ([https://corporateeurope.org/sites/default/files/attachments/ccc\\_email.pdf](https://corporateeurope.org/sites/default/files/attachments/ccc_email.pdf)), no changes have since been made.