



HOW NGOs EXERT

NGO

**INFLUENCE OF THE
EUROPEAN LEGISLATIVE
PROCESS**

Thibault Kerlirzin

What is the role of these unelected organisations in shaping the policies that are then imposed on the citizens of Europe?



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by **Mathilde Androuët**,
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Editorial

The recent 'Conference on the Future of Europe' confirmed the aspirations of citizens to play a greater role in the democratic life of Europe. This deep-rooted and long-standing aspiration is sometimes expressed through the emergence of special interest groups to represent the voice of the people to the institutions.

Among these are non-governmental organisations (NGOs), which - unlike lobbies - seem to benefit spontaneously from an impartial, benevolent aura, free from contingencies and technocratic, political or ideological agendas.

In 2011, the European Commission and the European Parliament set up a Transparency Register. Entities of various kinds (practices, companies, NGOs, public or semi-public bodies, etc.) that "seek to influence, directly or indirectly, the development of European policies and legislation" must register. This registration gives them the opportunity to meet Commissioners, members of their cabinets and Directors-General, who have to report back to them. At the end of 2012, there were around 5,400 of these entities, but today there are almost 13,300. Their work covers 40 sectors as diverse as the environment and education, migration and public health, the budget and maritime affairs. Very few studies or tools have been used to assess the impact of NGO activity on European democratic life. Are they truly non-partisan? Do they play a significant role in the decision-making processes of the European Commission or the European Parliament and, through legislative trickle-down, in national policies? And, more generally, which NGOs have access to our European institutions?

The European Union is sometimes perceived as a complex and opaque technocratic entity. The many organisations surrounding the European institutions can perhaps add to this feeling of impenetrability. It falls, therefore, to the elected and appointed representatives of the citizens of Europe, who wield significant influence over European legislation, to ensure that the decisions of the European Union remain firmly anchored in the defence of the general interest, the cornerstone of democratic life. As a corollary of this objective, it is essential that the public should have access to the information on which all decisions are based, i.e. that there should be transparency.

This study endeavours to contribute, in its modest capacity, to this project of democratic transparency, which is fundamental to the health of a democracy. Without wishing to be exhaustive, it seeks to analyse certain significant organisations in terms of their funding or the place they occupy in the news without our fellow citizens or even observers such as the media being well informed.

We hope you enjoy reading it!



Executive summary

As the hub of community legislative initiatives, the European Commission receives requests from a wide range of stakeholders on issues within its portfolios. From the environment (climate, oceans, etc.) to energy, from budgetary issues to digital technology, particular interests seek to be heard in various ways. As a result, the Commission's Transparency Register lists more than 12,600 different entities, each with a budget and staff dedicated to the interests it represents.

It includes almost 3,450 NGOs. Unlike corporate lobbying, however, there is little or no documentation of their lobbying activities. However, an examination of the issue from different angles reveals the role of these NGOs in relation to the Commission. This may be in the context of public consultations proposed by the European Commission, or in expert groups where different types of organisations come together to provide expertise and support for decision-making. But this is only one aspect of their leverage. At the same time, NGOs produce reports and recommendations, campaign - sometimes forming coalitions to increase their weight - and even get to meet Commission officials. As with businesses, we are therefore dealing with unelected parties whose influence is potentially decisive in terms of the legislation that will subsequently apply to the citizens of the Member States. In some cases, the benefits to citizens are controversial, as in the case of the Great Reset promoted by the World Economic Forum, which is registered as an NGO, and which the von der Leyen Commission seems determined to implement. But other elements are also questionable: how can we explain the disproportionate weight of American NGOs (Gates Foundation, Global Citizen, Pew Charitable Trusts) or deceptively European ones (Open Society) on issues that will affect EU citizens? Why grant NGO status to organisations that may present themselves as non-governmental but are funded by financial or geopolitical interests? Why is it that the leading NGO on transport (Transport & Environment) is mainly funded by foundations outside the EU? What are we to make of the fact that the majority of meetings with European officials are conducted by organisations funded by the same highly influential NGOs (Gates Foundation, Open Society)? Finally, some NGOs, while often acting as a front for various financial interests, exert their influence through other bodies that they subsidise (Gavi and Imperial College London for the Gates Foundation, Central European University for the Open Society).

In order to provide an overview of the influence of NGOs, and more specifically of influential NGOs in relation to the Commission, we have proceeded in several stages. By looking at the initiatives and influence of three of them - the Gates Foundation, the World Economic Forum and Open Society - we have been able to decipher the ecosystem in which these seemingly disparate organisations operate and their combined influence in promoting their agenda. With the help of a toolbox developed by the European Commission, we were then able to highlight NGO campaigns aimed at securing the adoption of their demands. We were able to clearly demonstrate their influence on the development of Community policy by comparing the recommendations of several NGOs with the final provisions of the Commission. In other cases, it has been the NGOs themselves who have claimed credit for their successes and allowed us to track the effectiveness of their actions. Sometimes their influence is such that their expertise is an integral part of certain portfolios - the example of Transparency International is one of the best illustrations of this. Finally, given the diversity of the entities that make them up, we have provided only brief examples of expert groups mandated by the Commission for their recognised expertise.

Recommendations

1. Carry out a European audit of the influence of US registered foundations on the European Commission, in particular the most influential ones: Bill & Melinda Gates Foundation, The Pew Charitable Trusts, Global Citizen, Open Society (deceptively European). Moreover, what legitimacy do they have to influence the decisions that will affect European citizens?
2. Call for the introduction of a European-style Freedom of Information Act, inspired by the American model. In the aftermath of the Fauci scandal, it seems appropriate to ask Commission officials to demonstrate transparency by making available to MEPs their e-mail communications with stakeholders and by publishing the minutes of all their meetings with them.
3. NGOs receiving funding from non-EU NGOs should declare this on their website homepage and in all written communications. European citizens and public officials must be able to easily identify who is addressing them and what support these actors are receiving.
4. Point out the recruiting of Commission officials, who on several occasions end up in NGO offices and on NGO boards, making it easier for these NGOs to conduct their lobbying activities.
5. Highlight conflicts of interest between NGO proposals and their founders, board members or various councils, and their funders. Here, we are referring to:
 - a. Bill Gates' financial interests in health and agricultural issues,
 - b. The interests of foundations linked to global finance that promote financialising marine and coastal ecosystem services,
 - c. The interests of foundations promoting the creation of marine protected areas, while at the same time acting on behalf of economic operators interested in exploiting seabed resources,
 - d. The promotion of the health pass by the World Economic Forum, which has also developed an economic exploitation of this market with the CommonPass.
 - e. NGOs, such as Transport & Environment or the European Climate Foundation, which promote the energy transition and are funded by economic stakeholders in this ecosystem.

6. Increase transparency to the point where minutes of meetings between entities listed in the Commission's Register are required to be published and made available for public consultation. Submit this proposal to the European office of Transparency International. Transparency International has developed a number of benchmarks for transparency and accountability. It may be appropriate to draw inspiration from this to create a transparency benchmark for NGOs by publishing these minutes.
7. Include hypothetical extra-institutional meetings (dinners, galas, etc.) when NGOs meet with the Commission.
8. Clarify what constitutes an "NGO", as this category seems to be used to cover organisations and activities which sometimes appear far removed from civil society concerns and interests (the World Economic Forum is a case in point).
9. Call for the removal of the term 'independent' in NGO descriptions, especially in cases where NGOs receive private and/or public funding.

For the Foundation :

1. Establish a European NGO Observatory to monitor the activities of NGOs - or at least selected NGOs, given their number - in all areas of their activities: reports, recommendations, public consultations, participation in expert panels, meetings, social networks, protests, coalitions and videos. This unit could be listed as an NGO in the Commission's Transparency Register and request regular meetings with Commission officials.
The question of NGO influence is more a question of harnessing democracy than of political orientation. This observatory could therefore at the very least operate across political lines.
2. Regularly report to EU citizens on the influence these NGOs have on the development of European policies. This influence is exerted without the NGOs having been elected or mandated by citizens.
3. Approaching an NGO as an isolated entity does not take into account the complexity, dynamism and effectiveness of an ecosystem when dealing with the European Commission. It seems necessary to identify and map the real networks of NGOs that may fund other NGOs, as well as 'independent' consultants or entities of various categories (for example, George Soros' Central European University and Imperial College London, funded by Bill Gates, and VI for Gavi, also funded by Bill Gates). Starting with an isolated NGO, we can quickly find ourselves facing a multi-entity ecosystem with much wider influence.

Introduction

This study provides information on a field that has so far received little or no attention at all. It does not claim to be exhaustive. The European Commission's Transparency Register lists almost 3,450 NGOs as of June 2021. We have sketched out an overview of the influence of certain NGOs on various issues. The information available on various European websites highlights the influence of NGOs in shaping the legislative process.

Several official processes can be identified:

- Meetings with European Commission members.
- Contributing to the drafting of roadmaps and/or public consultations.
- Participation in European Union structures and platforms.
- Attendance at non-official intergroups and groupings at the European Parliament.
- Participation in European Commission expert panels.

There are also other, more informal processes:

- Drafting of reports and studies for European policy-makers.
- Revolving doors: a number of key individuals from the European Commission have gone on to work for NGOs.
- The legitimacy that certain NGOs, such as Transparency International and WWF, have built up over time.
- Other key figures and organisations whose names are themselves a means of influence: World Economic Forum (Klaus Schwab), George Soros, Bill Gates.
- Funding of NGOs by the European Union in general and the Commission in particular. For example, the Excel file in the Transparency Register, which lists all the organisations, has enabled us to establish that more than 950 NGOs receive grants, the majority of which come from European programmes (e.g. Horizon 2020) and Commission Directorates-General, totalling more than one billion euros 'annually' (1). Reciprocal links are thus established, with this funding implying that the expertise provided in return will be taken into account by its funder, the Commission.

To provide some answers, we can also:

- Consult NGO activity reports to find the success stories they are claiming with the European Commission.
- Compare NGO recommendations with final Commission or European Parliament resolutions.
- Monitor the Commission's various writings on the role of NGOs on various issues.

Other elements remain inaccessible to us, such as hypothetical private exchanges during unreferenced emails or dinners.

The following study therefore represents a sample in which we have tried to combine the quantitative (in particular using Excel and, where necessary, pivot tables) with the qualitative in order to provide an overall perspective on the influence of NGOs on the Commission. All the information presented is open source.

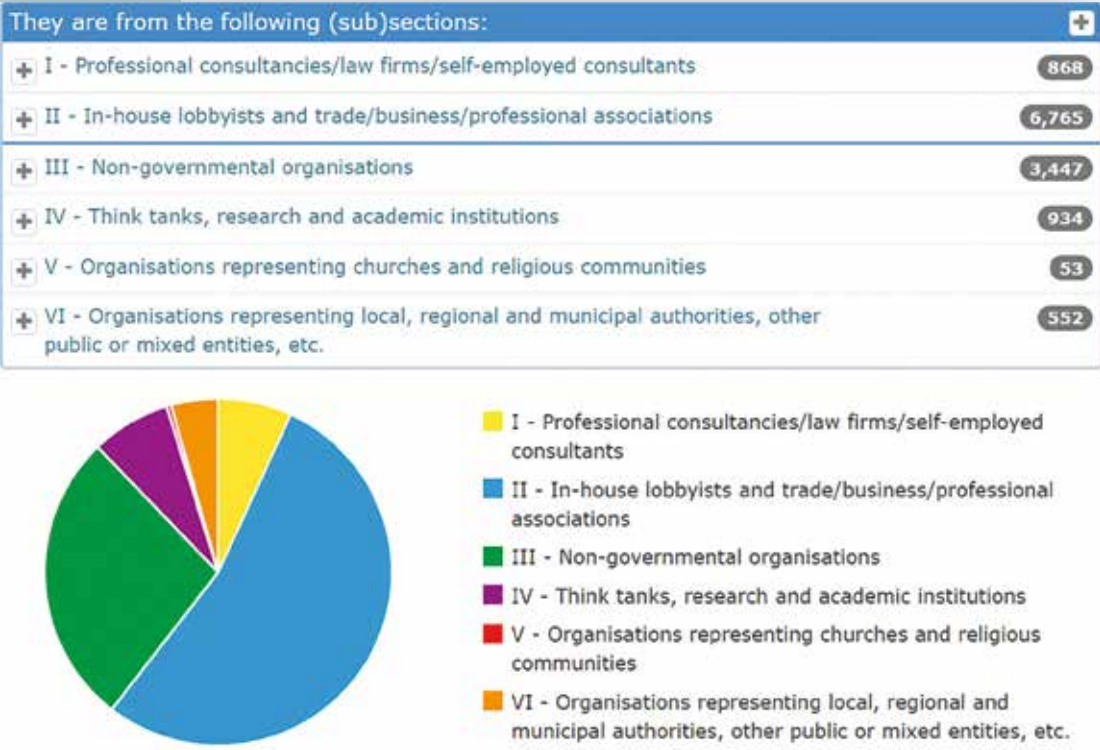
1. We put the term 'annual' in quotation marks because the data are based on the most recent financial years provided by the Commission's Transparency Register. However, not all organisations have the same periodicity.

Meetings with European Commission officials

The European Commission's Transparency Register

How does it work?

The European Commission and the European Parliament have jointly created a Transparency Register, 'a database of interest groups seeking to influence the development of European policies and legislation'. The Register shows 'which interests are defended, by whom and with what budget'. It 'promotes transparency in interest representation and makes the participation of interested parties and civil society in the democratic decision-making process of the European institutions more visible'. Within this framework, and according to the Commission's provisions of November 2014, Commissioners, members of their cabinets and Directors-General report on meetings with organisations or individuals independent of them. This Transparency Register is managed by a joint Transparency Register Secretariat, which in particular carries out quality checks, i.e. a verification of the accuracy of the data provided. The Register contains six categories of interest representatives (and fourteen sub-categories). As of 8 May 2021, the Register had 12,619 listed entities (compared to 5,431 in 2012, according to the Register's annual reports), distributed as follows:



The Wayback Machine on the archive.org website gives us a global view of the numerical evolution of each type of entity since 2015 (2), as this Register has existed since the end of 2014 (3). Using the figures for each year, we can create graphs to measure the changes in the number of entities registered and to put into perspective the growing interest of some of them in registering:

Category I:

- Specialist consultancies,
- Legal professionals,
- Consultants acting in a freelance capacity.



Category II:

- 'Internal representatives' (i.e. companies and groups),
- Industry representatives,
- Trade unions and professional associations,
- Other organisations.



2. In order to obtain a coherent graph, where the Wayback Machine allowed us to do so, we selected periods corresponding to those of this study: 27 February 2015, 13 March 2016, 20 March 2017, 17 June 2018, 2 April 2019, 29 February 2020, 27 March 2021.

3. The inter-institutional agreement relating to the creation of the Register was signed on 16 April 2014.

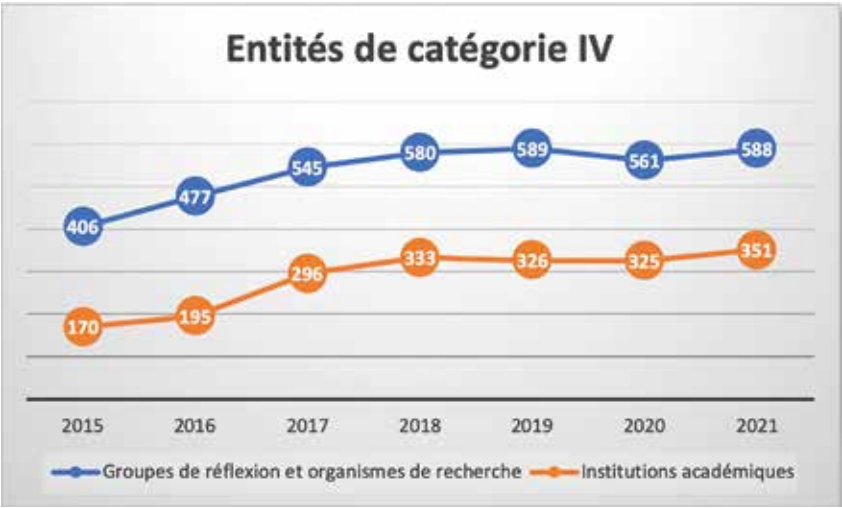
Category III:

- Non-governmental organisations (NGOs).



Category IV:

- Think tanks and research centres.
- Academic institutions.

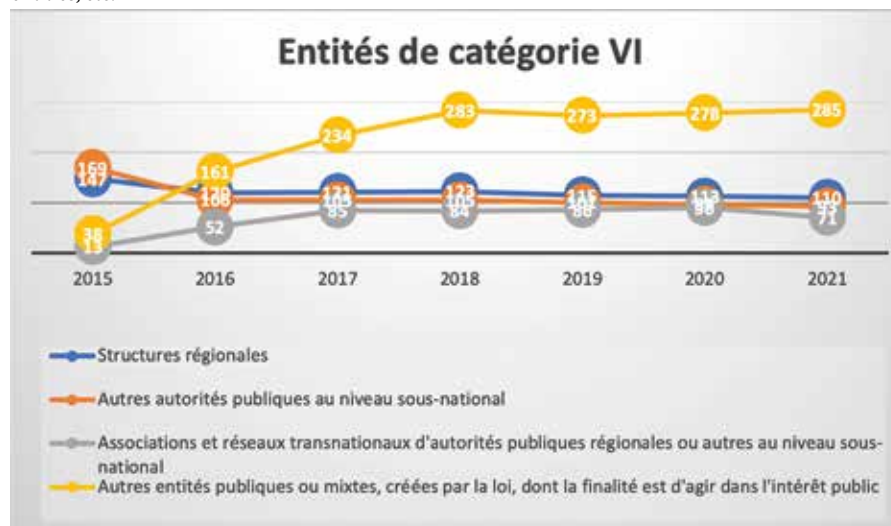


Category V:

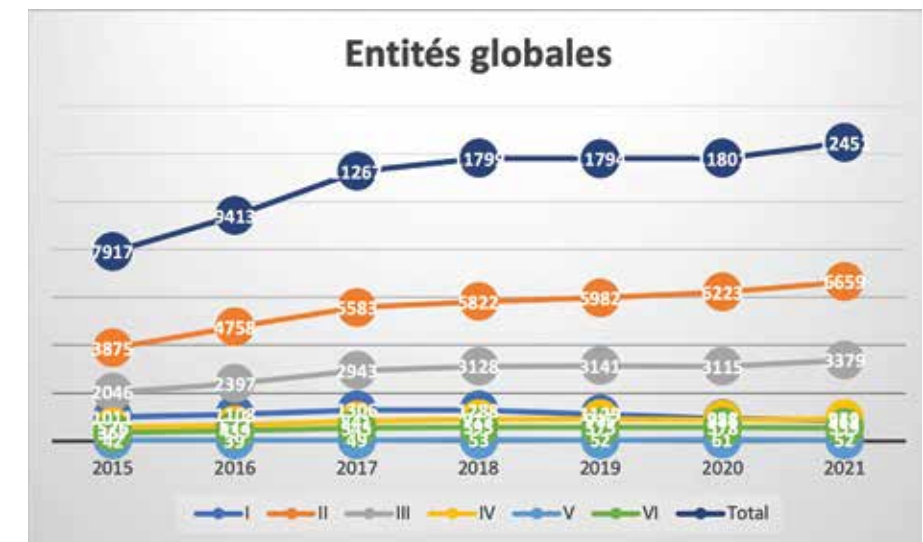
- Organisations representing churches and religious communities.

**Category VI:**

- Regional structures.
- Organisations representing local, regional and municipal authorities, other public or mixed entities, etc.



A cross-category comparison reveals the following graphs:



On 31 December 2020, there were 12 187 registrants in the Transparency Register spread across the following sections and subsections:

I - Professional consultancies/law firms/self-employed consultants	859
Professional consultancies	558
Law firms	88
Self-employed consultants	213
II - In-house lobbyists and trade/business professional associations	6 487
Companies & groups	2 622
Trade and business associations	2 578
Trade unions and professional associations	956
Other organisations	331
III - Non-governmental organisations	3 306
Non-governmental organisations, platforms and networks and similar	3 306
IV - Think tanks, research and academic institutions	921
Think tanks and research institutions	580
Academic institutions	341
V - Organisations representing churches and religious communities	59
VI - Organisations representing local, regional and municipal authorities, other public or mixed entities, etc.	555
Regional structures	113
Other sub-national public authorities	95
Transnational associations and networks of public regional or other sub-national authorities	76
Other public or mixed entities, created by law whose purpose is to act in the public interest	271

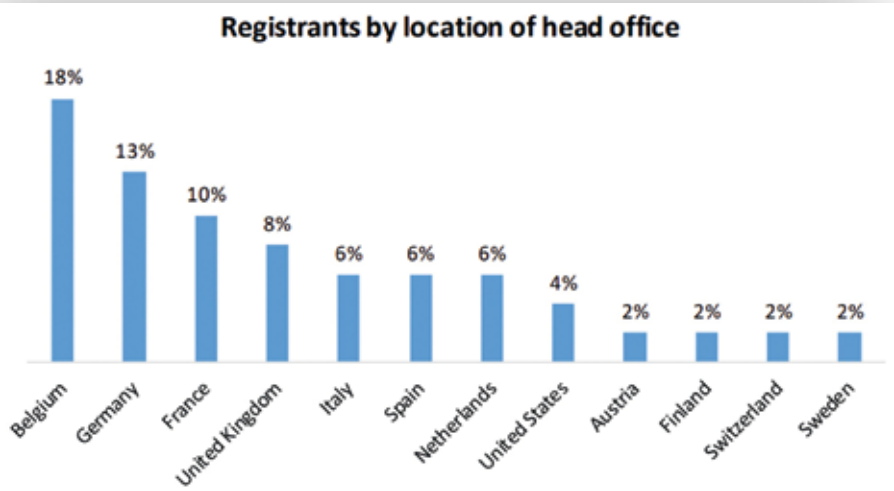
In its section on statistics by type of registered entity (section III.1), the 2020 annual report on the activities of the Transparency Register (4) states that Category II entities, as always, account for just over half of all registered entities. However, it also points out that this category is made up of several subdivisions. Taking these into account, the report states that NGOs (category III) are 'once again the most numerous'. The breakdown of entities by number (5) was reported as follows:

More than nine out of ten registrants have their head office within the European Union, with more than half coming from Belgium, Germany, France and the United Kingdom.

4. Produced by the joint secretariat (European Commission and European Parliament) to the Transparency Register.

5. The report also specifies the many reasons why entities are removed from the Register: voluntary withdrawal, automatic removal for failure to provide the mandatory annual update, removal by the Transparency Register joint secretariat following a quality check (duplication, inadmissibility, incomplete and/or inconsistent data).

However, the report specifies that these statistics are based on the declarations of the entities themselves, which must also declare their office in Belgium "if they have one, in addition to their head office". In this 2020 report, the United States comes 8th with 4% (compared to 3.46% in the 2019 annual report), representing more than 450 registered entities. Belgium comes first, but this means that the registered entities have a Belgian office (usually in Brussels), not that they are Belgian (6). So there can be American NGOs, or NGOs from any other country, but with a European branch headquartered in Brussels:



Registration provides benefits for entity representatives:

• **For the European Parliament:** long-term access to buildings (accreditation is granted for a maximum of one year); permission to speak at a public hearing; subscription to e-mail alerts on the activities of the European Parliament's committees; participation in/support for the activities of the Parliament's intergroups or unofficial groups; possibility of co-organising political group events in the European Parliament; authorisation to request the patronage of the President of the European Parliament.

. **For the European Commission:** meetings with members of the Commission, cabinet members and the Directorate General; the possibility of being informed about public consultations and roadmaps in the registrants' area of interest; the possibility of being appointed as a 'certain type of member of an expert panel'; the receipt of patronage; the possibility of inviting European officials to a meeting or event. On this point, the report stresses that "contacts with non-registered organisations may be limited".

The full report can be downloaded, notably in the form of an Excel database, and an analysis of all registered organisations using pivot tables highlights a number of elements::

• **111 NGOs have their headquarters directly in the United States.** Despite this, some are influential with the Commission: Bill & Melinda Gates Foundation (7), Global Citizen, The Pew Charitable Trusts, etc.

6. A classic example is the Open Society European Policy Office (OSEPI), the Brussels branch of George Soros' Open Society, which is particularly close to and influential in the American Democratic camp and therefore in the White House when that party is in power. George Soros himself backs this party.

7. Apart from its status as an American legal entity, there is another element that we find problematic. From an ethical point of view, it seems difficult to understand why the European Commission should roll out the red carpet for Bill Gates, who is close to Jeffrey Epstein and even appears in his black book. As early as 05 October 2019, an article in France Info pointed out that Gates' name appeared several times in Epstein's flight log. Across the pond, Fox Business had already noted on 20 August 2019 that Jeffrey Epstein's estate executor was a former advisor to the Gates Foundation, Boris Nikolic, managing director of Biomimetics Capital. In addition to the Epstein affair, the Gates Foundation's database of grants is a useful source of information on its generosity to Bill and Hillary Clinton's organisations: around one hundred donations, mainly to the Clinton Health Access Initiative Inc. and the Bill, Hillary & Chelsea Clinton Foundation, totalling more than 300 million.

8. Although they are not in first place on this topic, NGOs also represent 36% of the entities focusing on 'international cooperation and development'.

Influence of **NGOs** on the European legislative process

• At least six of these NGOs have ten or more staff dedicated to European lobbying:

NGO	Staff deployment	Full-time equivalent
The Pew Charitable Trusts (Pew)	33	33
Consumer Choice Center (CCC)	16	13
The Regulatory Assistance Project (RAP)	15	11,5
European Horizons	15	3,75
International Council on Clean Transportation (ICCT)	12	9
Clean Air Task Force, Inc. (CATF)	10	6,5

• In terms of thematic breakdown - as indicated in the Excel database, bearing in mind that the same organisation may be present in several thematic areas, which is often the case - NGOs are on several occasions the most numerous category in the total number of entities:

Topic	NGO in %
Humanitarian aid & civil defence	47%
Migration & asylum	47%
Youth	46%
Justice & fundamental rights	39%
Education & training	37%
European Neighbourhood Policy	36% ⁽⁸⁾
Culture	34%

• Environment/climate/energy issues, as well as technology and digitalisation, are the main topics of interest for registered organisations (as a whole). These issues are particularly articulated around the European Green Deal of the von der Leyen Commission, which echoes the Great Reset promoted by Klaus Schwab, President of the World Economic Forum:

Topic	Registered entities
Environment	6 947
Research & innovation	6 455
Climate action	5 702
Business & industry	5 342
The digital economy & society	5 280
The single market	4 962
Energy	4 789
Competition	4 550
Commerce	4 418
Consumers	4 197

The list of these meetings is available on each entity's dedicated page in the European Commission's Transparency Register (9). However, given the number of NGOs and the disparity between them in the number of meetings held with the Commission, it is important to distinguish the weight of each entity. A review of a number of laws, discussions, debates, projects, etc. shows that some NGOs and NGO networks and/or coalitions have more influence than others.

- By coalition, we mean an entity that includes a varying number of other entities, either exclusively NGOs (Deep Sea Conservation Coalition) or NGOs and other types of entities such as companies (World Economic Forum).
- By network, we mean an ecosystem of NGOs that may share one or more funders and regularly engage in joint activities, whether coordinated or not. Although it is not possible to draw up exhaustive maps of NGOs - which is not the purpose of this study - we sometimes use the term 'nebula' when there is evidence that NGOs belong to an ecosystem. However, we cannot determine the extent of their links and influences, which may be reciprocal (win-win partnerships) or unilateral (funding of an NGO by a donor in return for positions taken in line with this funding). According to this definition, a network can also take the form of a coalition.

9. It should be noted that meetings arising from the work of expert panels are included in the number of such meetings for each entity. The more an entity is active and present in expert panels, the greater the number of such meetings.

10. Acronym for Strategic Lawsuit Against Public Participation, i.e. a legal action designed to hinder political participation and activism.

16. His LinkedIn profile provides further details on his career path: trainee at the European Union office in Hong Kong and Macao (2009-2010); Europe department of the directorate for international affairs at ENA (2010-2011); co-founder and financial director of the now defunct European Daily (January 2008 - March 2013; the newspaper interviewed George Soros on 30/10/2012) ; assistant to MEP Gerald Häfner on legal and constitutional issues (March 2013 - June 2014); European advocacy officer on ethics issues at Transparency International (July 2014 - May 2019); Alliance 90 / Les Verts MEP since the 2019 European elections. His Wikipedia entry provides more information, including that he was 'one of the main interviewees' in the Arte documentary 'Hungary, Orbán and the rule of law'.

17. The Commission's Transparency Register records only one meeting with this NGO, dated 2015, and no activity in terms of participation in the preparation of roadmaps or public consultations, or participation in expert groups. However, it is a regular sponsor of other NGOs.

18. As far as companies are concerned, which are not covered in this report, Google, based in the United States, had the most meetings with the European Commission (all category II entities combined) during the Juncker mandate, with 213 meetings (ahead of Business Europe, with 209 meetings).

Integrity Watch: dynamic use of registry data

In order to identify the potentially most influential NGOs within each portfolio, we relied on the Integrity Watch tool. The project was initially launched in October 2014 by the European office of Transparency International (TI EU) under the leadership of Daniel Freund, who is described as a former advocacy officer in the NGO's Money & Politics team (16). According to TI, the Integrity Watch project is co-funded by the European Commission, the Open Society Initiative for Europe (OSIFE), a European - but not Brussels-based - branch of George Soros' NGO, with a contribution from the King Baudouin Foundation (KBF) (17). It also relies on a technology known as D3 (Data-Driven Documents), developed by the New York Times. Using a dynamic sorting and filtering system (by lobbying organisation, by host, by topic), Integrity Watch makes it possible to measure, using the subcategories of organisations defined in the Commission's Transparency Register, the number of meetings held by each organisation, specifying the host, the portfolio concerned and the topic of the meeting. This is done separately for the Juncker Commission (2014-2019) and for the current von der Leyen Commission (2019-2024) - the names of the portfolios having changed from one Commission to the next. The tool also provides a top 10 list of organisations that have had the most meetings with Commission officials (members of a Commissioner's cabinet; Commissioners; Directorates-General, with this information specified), making it possible not only to measure the influence represented by an organisation, but also to identify an ecosystem by looking at the other names in the top 10. Once this has been done, research into the funding of these top-ranked organisations shows whether these influential NGOs are independent of any funding from their fellow organisations, or whether they multiply their potential impact by being part of the same network. This tool and the classification it proposes will be one of the main themes of the first part of our study, and has also enabled us to identify NGOs whose influence we felt was relevant to track. The quantitative index led us to the qualitative analysis. In a nutshell, using the Integrity Watch tool, we can use their rankings to highlight a number of NGOs and, above all, the NGO networks that have the greatest influence on the European Commission. We are not talking here about groupings of NGOs (such as the European Consumers' Organisation or the European Environmental Bureau, although these will be discussed in another section), but about individual NGOs, albeit only seemingly. The information we have found has enabled us - excluding environmental networks - to identify three particularly significant NGOs, both as an entity and in terms of their funding or connections: the Gates Foundation, Klaus Schwab's World Economic Forum (i.e. Davos), and George Soros's Open Society European Policy Office (OSEPI). Where relevant, we will also elaborate on other NGOs whose influence raises questions, such as Global Citizen, which has nothing European about it but, like the Gates Foundation, is an NGO governed by US law, yet is listed as the top NGO in meetings with the Commission Presidency (18).

< Notes for the left page table:

- 11. Two members of the NGO have been consultants, notably for the Open Society, and one of the former executive directors of OSIWA (Open Society Initiative for West Africa, i.e. the West African branch of the Open Society, which also funds the Africa branch of Le Monde newspaper) is a member of the Mighty Earth office.
- 12. Funded in particular by Free Press and Justice for Journalists - whose board of directors includes Jeff Gedmin, former chairman of Radio Free Europe / Radio Liberty, a Soros creation.
- 13. Awarded in 2019, the Open Society's \$50,000 grant to the Stichting Greenpeace Council (the NGO's Foundation) was intended to support the environmentalist organisation in its work on SLAPP.
- 14. Two grants, the first totalling €2.5 million in 2017, for the first three years of the NGO's launch.
- 15. The NGO claims to have been originally set up in 2008 by the Open Society.

An example of a coalition: CASE and anti-SLAPP (10)

The Commissioner responsible for the Values and Transparency portfolio, Věra Jourová, reported on Twitter on 26 March 2021 how 'proud' she was to launch the new 'anti-SLAPP' website, 'developed by a coalition of NGOs'.



The coalition in question is called CASE, and the first page of its website lists its 29 members. This alliance is closely linked to the Open Society: three-quarters of its member NGOs are funded by George Soros' organisation (note in our summary table below that the shaded NGOs are all environmental NGOs). Here, we use a colour code which we will use throughout our study:

- **Green background:** funding by a single NGO (here the Open Society, elsewhere the Gates Foundation, for example).
- **Yellow background:** indirect funding (via another NGO funded by the Open Society, for example) or partnership with the reference NGO.
- **Grey background:** no financial link established.

European Environmental Bureau	International Media Support	PILnet
Mighty Earth ⁽¹¹⁾	Sherpa	European Centre for Press & Media Freedom ⁽¹²⁾
Daphne Caruana Galizia Foundation	Greenpeace ⁽¹³⁾	PEN International
Environmental Paper Network	Committee to Protect Journalists	A4ID (Advocates for International Development)
Index on Censorship	Justice and Environment	Civil Rights Defenders
Osservatorio balcani e caucaso transeuropa	Civil Liberties Union for Europe ⁽¹⁴⁾	Transparency International EU
International Press Institute	European Center for Not-for-Profit Law	Whistleblowing International Network (WIN)
Blueprint for Free Speech	Article 19	Fédération internationale des droits de l'Homme (FIDH)
Reporters Sans Frontières	European Federation of Journalists	NGO Shipbreaking Platform
Umweltinstitut Munchen	Media Defence ⁽¹⁵⁾	

In light of their involvement in the covid-19 pandemic, the examples of the Gates Foundation and the World Economic Forum, and their ecosystems, are of particular pertinence. The following section will successively examine:

- The Bill & Melinda Gates Foundation (BMGF),
- The World Economic Forum (WEF),
- The Open Society European Policy Office (OSEPI).

Bill & Melinda Gates Fondation

The Bill & Melinda Gates Foundation is the largest budgeted NGO of the category III entities registered in the Transparency Register. The foundation's fact sheet reveals an overall budget of €33.6 billion for its last financial year (January 2019 - December 2019).

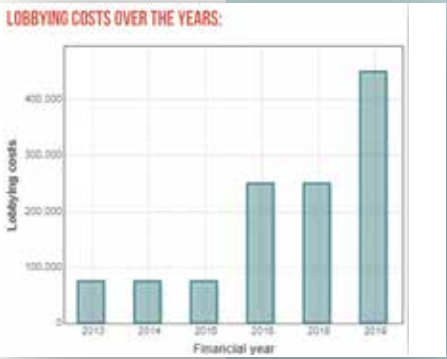
The Foundation's dedicated page on the Lobby Facts website (19) provides detailed information on its spending on European lobbying (see screenshot on the right). Between 2015 and 2016, the Gates Foundation (BMGF) increased its budget by almost 2.5 times. However, the 2017 financial year is not included in the Lobby Facts graph. Subsequently, between 2018 and 2019, this budget almost doubled, to around €450,000. With regard to staffing levels, the BMGF has three dedicated staff members for the European Union, constituting a full-time equivalent of 1.25 people (one at 75%, and the other two at 25%), which is arguably a modest number given the foundation's considerable influence.

The Foundation defines its goals & missions as follows: ‘Guided by the belief that every life has equal value, the Bill & Melinda Gates Foundation works to help all people lead healthy, productive lives. In developing countries, it focuses on improving people's health and giving them the chance to lift themselves out of hunger and extreme poverty. In the United States, it aims to ensure that everyone, especially those with the fewest resources, has access to the opportunities they need to succeed at school and in life. Based in Seattle, Washington, the foundation is led by CEO Mark Suzman under the direction of Bill and Melinda Gates and Warren Buffett (20). The Foundation is represented in the following countries: United Kingdom, Germany, United States, China, India, Ethiopia, Nigeria, South Africa.’

The BMGF presents its European initiatives as follows: 'Main EU initiatives covered in the previous year by activities falling within the scope of the Transparency Register:

- Attendance at meetings and conferences (such as the European Development Days)
- Bilateral meetings with staff from the Directorate General for International Partnerships and the Directorate General for Research on global health and agriculture issues related to research and development, nutrition, the Sustainable Development Goals and, more generally, health, gender and agriculture policies, as well as with the Directorate General for Health on global health’. Its areas of interest are: ‘Agriculture and rural development (21), international cooperation and development, education and training, youth, research and innovation, public health’.

The case of the Gates Foundation (22) is striking. The influence of this American foundation (23) seems disproportionate in relation to the full-time equivalents of its staff and its legitimacy as a non-EU body. Unlike other foreign bodies, the BMGF does not have a Brussels office and thus operates as an American actor within the European Union. The Foundation's headquarters are also close to the White House:



19. Lobby Facts is a website developed by the Corporate Europe Observatory and LobbyControl, two NGOs that we would describe as non-independent. In 2018 (last published), the Corporate Europe Observatory received €94,446 from the Open Society Initiative for Europe (OSIFE) to "study corporate influence & strengthen regulation of European lobbying". Between 2014 and 2019, Open Society gave the Corporate Europe Observatory almost €623,500, making it the third most generous funder after the Isvara Foundation and the Adessium Foundation. Having said that, we will make little use of this website, which appears to give erroneous information about the number of meetings between organisation representatives and the European Commission. In the case of OSEPI, Lobby Facts lists 29 meetings and backs up its figures with references to the European Commission's website. Lobby Facts states that other meetings may have taken place with staff other than Commissioners, their cabinets or Directors-General, but that the Commission has not provided this information. This statement is incorrect: the list of meetings is available in the Transparency Register file. In the case of OSEPI, the available pdf file reports 79 such meetings, i.e. 50 more than Lobby Facts reports. The same error is found in the Bill & Melinda Gates Foundation file: Lobby Facts reports 7 meetings, while the pdf available in the Transparency Register file lists 65.

20. The same Warren Buffett said a few years ago on the subject of class warfare: 'It is my class, the class of the rich, that is waging this war and it is winning. On 23 May 2021, Buffett resigned from the Gates Foundation.

21. This raises the question of conflict of interest. As we will see in the following pages, Bill Gates is now the largest landowner in the United States. On 8 May 2021, NBC News reported that the French fries, carrots and onions in McDonald's, for example, come from Gates' farmland, purchased through Cascade Investments, Bill & Melinda Gates' investment group. The NBC News article also highlights the lack of transparency on the part of Gates and his group regarding the acquisition of this land and the use of shell companies, as well as the lack of sustainable farming practices and the environmental impact of Gates' farming methods. Still on the subject of food, Bill Gates is calling on rich countries to switch to a food policy based on '100% synthetic meat'. The billionaire has invested in several start-ups involved in the production of synthetic meat: Impossible Foods, Beyond Meat, Memphis Meats and Hampton Creek Foods.

22. For information, the Gates Foundation can also fund press titles. In France, for example, between November 2014 and March 2019, the BMGF awarded five grants totalling around US \$3.8 million to the Africa section of the newspaper Le Monde. The theme is always the same: "Analysis and raising public awareness on global health and development". Grants to Le Monde generally run for 12 months. However, the March 2019 grant, worth around US\$2.1 million, is spread over 36 months (i.e. 3 years). The same Africa section of Le Monde is also a partner of George Soros' Open Society Initiative for West Africa (OSIWA).

23. The 501 c3 status, i.e. the legal typology applied to foundations, charities, charitable trusts, etc., is not subject to federal tax. These organisations are exempt from paying federal tax.



In addition, the pdf file listing the Gates Foundation's meetings with Commissioners, members of the Commission or its Directorate-General lists 66 meetings since 1 December 2014. Like OSEPI (Open Society European Policy Office), the BMGF has benefited from several meetings that are listed in the Commission's portfolio under the heading 'President'. These meetings are far more numerous than those of OSEPI, which had four. As of 9 May 2021, BMGF had obtained eleven interviews, including nine from 27 March 2020 to date. The timetable for these meetings is also noteworthy, highlighting the fact that they have picked up pace since the von der Leyen Commission:

- 22 January 2015: Juncker meets Bill Gates to discuss international development issues.
- 12 January 2018: meeting with Luc Tholoniati, member of Juncker's cabinet, for a presentation of the BMGF's work.
- 27 March 2020: video conference with Kurt Vandenberghe, member of von der Leyen's cabinet, on the subject of COVID19.
- 09 June 2020: same as above.
- 24 June 2020: same as above.
- 20 November 2020: Video conference between Ursula von der Leyen and the co-founder and co-president of the BMGF. The name of this person is not specified, but only three people from the foundation have the status of co-president: Bill Gates, his ex-wife Melinda and Bill's father, William Gates Sr. As the latter died on 14 September 2020, the meeting took place with Bill and/or Melinda Gates. The topic is not specified. However, this meeting took place just a few days after Ursula von der Leyen attended the Paris Peace Forum 2020 on 12 November 2020. Although her presence was not mentioned in the event's programme, the European Commission's news summary stated that von der Leyen would speak at the session entitled 'ACT-A (Act-Accelerator): Vaccines, tests and therapies against COVID-19, the way to global public good'. This session was attended by Emmanuel Macron, Theodoros Adhanom Ghebreyesus (WHO Director-General), Seth Berkley (CEO of Gavi, generously funded by the Gates Foundation), Melinda Gates and Erna Solberg (24).

- 14 December 2020: Video conference with Kurt Vandenberghe, member of von der Leyen's cabinet, on the subject of COVID-19.
- 8 January 2021: Same as above.
- 13 January 2021: Video conference with Kurt Vandenberghe on the topic of the Green Deal.
- 22 January 2021: Video conference with Kurt Vandenberghe on Mission Innovation and the Breakthrough Energy Catalyst programme.
- 2 March 2021: Teams meeting with Kurt Vandenberghe, in the form of a preparatory meeting for the call between von der Leyen and Bill Gates concerning the Catalyst programme.

What are Breakthrough Energy and its Catalyst branch?

"In Europe, we are fortunate to have a wealth of scientists and innovators leading the way to decarbonisation. We just need to help them bring their ideas to market."

Ursula von der Leyen,
"Video message of President von der Leyen & Bill Gates, Founder of Breakthrough Energy", 2 June 2021.

Breakthrough Energy describes itself as "a network of entities and initiatives, including investment funds, philanthropic and non-profit programmes, and policy efforts, bound together by a shared commitment to scale the technologies we need to achieve a zero emissions path by 2050". Breakthrough Energy was founded in 2015 by Bill Gates on the model of public-private partnerships. He is still chairman. Early investors included George Soros and Mark Zuckerberg (Facebook), according to Forbes. Some of the original investors are still there today, as well as some new ones: Jeff Bezos (Amazon - a Category II entity), Jack Ma (Alibaba), Richard Branson (Virgin Group), Xavier Niel (Iliad Group - among others - a Category II entity), David Rubenstein (co-founder and Executive Co-Chairman of the influential Carlyle Group - a Category II entity), John Arnold (Laura & John Arnold Foundation), Michael Bloomberg (Bloomberg LP, a Category II entity), Mukesh Ambani (Reliance Industries Limited ; Ambani was the 10th richest man in the world in 2021 and has been described by Le Monde as ‘the most powerful man in Asia’). This list is not exhaustive. What they all have in common is that they are billionaires.

Breakthrough Energy Catalyst is described as 'the first programme of its kind to demonstrate how we can finance, produce and buy the new solutions that will inspire a low carbon economy'. Its dedicated page defines it as focusing on 'accelerating the deployment of clean technologies'(25). In particular, the Catalyst programme aims to provide a platform to 'bring emerging technologies to market quickly'. Catalyst will initially focus on four technologies: green hydrogen (also known as clean hydrogen), aviation biofuel (26), long-term energy storage (27) and direct air capture (28). The desire to open up markets - and therefore, without naming them, the legislative changes that this implies - is clearly stated. Among other things, it is specified that Catalyst will 'develop a blended funding mechanism to attract grants, loans and capital investment to access the markets that these technologies will need to succeed'.

It should be noted that the Breakthrough Energy Catalyst Foundation has been registered as an NGO in the European Commission's Transparency Register since 12 March. It has already had nine meetings with Commission officials, including three before its registration date.

As part of the European Green Deal, on 2 June 2021 Catalyst and the European Commission announced their partnership 'to support investment in clean energy for low carbon industries'. According to the press release, this new partnership aims to 'invest in a portfolio of high-impact European projects to meet the objectives of the European Green Deal, focusing on the four energy sources mentioned above. The aim is to speed up the transition to a sustainable European economy'. European support will come from the Horizon 2020 programmes and the European Commission's Innovation Fund. The press release goes on to say that the Commission and Breakthrough Energy will work together to set up the programme in the coming months, and that this is the second partnership between the European Commission and Breakthrough Energy. Back in 2019, the Commission and Breakthrough Energy Ventures Europe (29) set up a €100 million investment fund to secure investment commitments in key energy-related sectors "where efforts are essential to tackle climate change".

Note for page 17
24. The Prime Minister of Norway, Erna Solberg, has worked with the Gates Foundation in the past. In fact, the Norwegian government and the Gates Foundation have been the initial backers of Gavi, the Vaccine Alliance (more on this below.), since its creation in 2000. On 15 November 2013, the Norwegian Prime Minister's Office reported a meeting between Erna Solberg and Bill Gates in Oslo to discuss 'the longstanding partnership between Norway and the Gates Foundation'. Gavi was described as the 'cornerstone' of this partnership. On 7 May 2020, the Norwegian newspaper Resett reported that Solberg had decided to grant an additional US\$13 billion to the Gates Foundation as part of Gavi and CEPI (Coalition for Epidemic Preparedness Innovation, see below).

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25. These include lithium-ion, wind and solar power. N.B.: these three energies actually cause significant environmental damage in their production and are therefore far from clean (see in particular the conditions under which neodymium for wind turbine magnets and lithium are extracted in Argentina, Bolivia and Chile).
26. Sustainable Aviation Fuel (SAF).
27. Long-Duration Energy Storage (LDES).
28. Direct Air Capture (DAC), to capture carbon dioxide.
29. The other branches of Breakthrough Energy, which we won't go into here, are Breakthrough Energy Action, Breakthrough Energy Ventures, Breakthrough Energy Solutions Canada, Breakthrough Energy Sciences, and Breakthrough Energy Fellows.

However, the BMGF's registration form states that it has not participated in any roadmaps, public consultations, EU structures and platforms, unofficial intergroups and groupings (European Parliament) or expert panels of the European Commission - activities that would have made it possible to measure its public involvement in European issues (30) and to understand the legitimacy of its lobbying.

A financial backer of the European Commission

A first element of influence can be found in the Gates Foundation grants database. Between September 2010 and March 2020, the BMGF awarded five grants to European institutions, either directly or indirectly:

1. Direct beneficiary: European Commission. Amount: US\$500,000; date: 2020; phasing: 17 months.
Goal: 'To provide additional funding to National Nutrition Information Platforms in 10 countries to strengthen the quality of cross-sectoral policy dialogue to accelerate the reduction of malnutrition'.

2. Direct beneficiary: European Commission. Amount: US\$45.18 million; date: March 2019; phasing: 238 months (i.e. 19 years and 10 months).
Goal: 'to provide additional funding to the European Fund for Sustainable Development (EFSD), which includes the African Health Diagnostics Platform (31), to support projects that increase access to affordable, quality diagnostic testing services'.

3. Direct beneficiary: European Centre for Development Policy Management (32). Amount: US \$399,982; date: March 2017; phasing: 25 months.
Goal: 'To increase the impact of the European Union's development programmes and policies on the poorest and most vulnerable people in developing countries through the generation of knowledge'.

4. Direct beneficiary: European Commission. Amount: US\$500,000; date: February 2016; phasing: 22 months.
Goal: 'to provide technical support for the development, implementation and operation of National Information Platforms for Nutrition in up to 10 pilot countries'.

5. Direct beneficiary: Imperial College London. Amount: €2.69 million; date: September 2010; phasing: 40 months.
Goal: 'to enable the British and French governments and the European Commission to provide more effective agricultural development support for small landowners in sub-Saharan Africa'.

30. These figures are surprising and contradictory if we compare them with those of Transparency International, for example by referring to the latter's file available on the Transparency Register (registered persons, European subsidies, etc.). This raises the question of what we might call 'undue' lobbying, for example by comparing Transparency International's pdf list of meetings with those of the Open Society European Policy Institute (OSEPI) and the Bill & Melinda Gates Foundation. TI and OSEPI registered at almost the same time, in 2008. However, TI has a much larger staff and was originally European (German). However, since 09/12/2014, TI has only had 49 meetings with Commission officials, compared to 79 for OSEPI and 66 for the Gates Foundation - the latter having only registered since 8 January 2015. Moreover, unlike OSEPI and the BMGF, TI held only one meeting (on 2 February 2016) with the cabinet of the then president, Jean-Claude Juncker, via Antoine Kasel - a member of that cabinet - to discuss the corporate tax avoidance legislative package.

- 31.** African Health Diagnostics Platform (AHDP).
32. European Centre for Development Policy Management, un think-tank.

Meetings between the Gates Foundation and the European Commission

Integrity Watch illustrates the importance of the Gates Foundation and highlights its networks - through the NGOs it supports. The results are surprising for an American foundation, with the BMGF taking first place four times.

Budget

The NGOs that make up the top 10 in this portfolio will be discussed in more detail below, looking at the meetings between the Soros networks and the European Commission. We will only mention here the 1st position of the Gates Foundation. It is difficult to understand how a foundation governed by US law, with no Brussels office and a limited staff (1.25 full-time equivalents spread over three people), can at the same time be the number one NGO in terms of the number of meetings (5 meetings) with European Commission officials to discuss budgetary issues - just as its positions in the top 10 of other portfolios are astonishing. What's more, these meetings took place in a relatively short period of time compared to the five-year Juncker mandate (2014-2019). The BMGF spread its meetings over just over 18 months (33):

- 25 January 2018: Financing development.
- 26 April 2018: External Investment Plan.
- 17 October 2018: Multiannual financial framework of the European Union.
- 12 April 2019: European research policy and support for humanitarian projects.
- 18 July 2019: Humanitarian aid policy.

Development

The Gates Foundation comes first with 18 meetings. The BMGF addressed a wide range of topics in these meetings: National Information Platforms for Nutrition (NIPN(34)); Primary Health Care [Performance] Initiative (PHCPI(35)) - as well as its indicators and areas of cooperation following the adoption of the Sustainable Development Goals (SDGs); European plans for innovation and research, extra-EU investment, polio eradication, global health, agricultural research (remember that Bill Gates is the largest landowner in the United States), the Paris Summit, health and education; discussion of the joint work of the DG for International Cooperation and Development and the Foundation in the field of health; and also planning for a meeting between Jean-Claude Juncker and Bill Gates in Davos.

- **In 2nd place is OXFAM**, a leading international NGO. Although the Transparency Register states that OXFAM EU did not receive any grants from the Commission in its last financial year, this is not always the case. For example, the NGO's 2017-2018 annual report states that its Gender Leadership in Humanitarian Action handbook was funded by the Commission's Humanitarian Aid and Civil Protection department (ECHO). In comparison, Gates funds Oxfam at a much higher level than George Soros, with a total of 55 grants since 1999. The two largest grants (in 2015 and 2018) total over US\$27 million and relate to gender equality in agricultural development. The foundation's largest grant in 2013 was for 'Opportunity & Global Growth', again in agricultural development, and totalled US\$17 million. Another notable Gates grant to OXFAM in 2008, again for 'Global Growth & Opportunity', focused on financial services for the poor and amounted to US\$14.8 million.



33. By comparison, George Soros' OSEPI's 4 meetings on budgetary issues were spread between March 2015 and February 2018, i.e. three years.

34. Funded by the European Commission, the Gates Foundation, UK Aid and the German Cooperation.

35. The PHCPI is a partnership between the Gates Foundation, the World Bank Group, WHO, UNICEF (the Gates Foundation funds all three organisations), Ariadne Labs and Results for Development.

We are mentioning one-off donations here, but the theme of agricultural development, for example, is a recurring one in BMGF donations to OXFAM.

- **In 3rd place is CONCORD Europe.** Between 2011 and 2020, the BMGF has awarded it more than US \$3.2 million in its Global Policy and Advocacy division for the topic of 'Global health and development, public awareness and analysis'.

- **In 5th place is the NGO ONE.** It was co-founded by Bono, an admirer of George Soros, and includes Morton Halperin, a close friend of Soros. As with OXFAM, Gates' grants to ONE (The ONE Campaign) far exceed those given by Open Society. The 21 grants in the BMGF database total almost US\$200 million. Joe Cerrell, the Gates Foundation's executive director for global policy and advocacy, sits on ONE's board of directors. Like Open Society's Washington office (see below, section on OSEPI), ONE's headquarters are close to the White House, as a Google Maps search will show:



- **In 6th place is the Deutsche Stiftung Weltbevölkerung**, which has received more than US\$40 million in funding from the BMGF since 1998 via a total of 12 grants. The main focus of these grants is global development, with family planning as the theme. The largest grant (US\$10.9 million), dated 2015, is described as follows: 'To increase and improve German and European Union funding for global health and development, to improve access to family planning funds by local civil society organisations in Africa, and to increase country funding for family planning in Africa'.

- **In 7th place, Save the Children** has received almost US\$200 million in grants from the Gates Foundation since 1998. In some cases, the sums are particularly substantial. In 2005, a grant of US \$75.8 million was awarded to test and evaluate a range of health technologies and tools for newborn babies. In 2000, a US\$49.6 million grant was awarded to tackle infant mortality.

- **In 10th place, ActionAid** has received 9 grants from the BMGF since 2006, totalling almost US\$27 million. ActionAid also received more than US\$155,000 in grants from the Open Society between 2016 and 2019.

The following table provides a summary, using our colour code for the top ten NGOs financed by the BMGF.

OXFAM EU	CONCORD Europe	Lumo Foundation
ONE	Deutsche Stiftung Weltbevölkerung	Save the Children International
Women Political Leaders	Plan International EU	ActionAid

Research, science and innovation

The Gates Foundation is once again in 1st place for meetings secured with Commission officials, as part of the European portfolio dedicated to research, science and innovation. A total of 16 meetings were held, covering a range of topics including 'clean' energy, global health, infectious diseases, energy efficiency and clinical trial partnerships between European and developing countries.

• **The Wellcome Trust, the third NGO in the top 10**, received several grants from the BMGF between 2014 and 2016. These were spread over four donations totalling just over US\$600,000. This is relatively small compared to the funds available to the trust.

• **The 4th organisation is the World Economic Forum led by Klaus Schwab**, architect of the Great Reset and former member of the Bilderberg Group steering committee. Gates is a patron of the Forum, to which his Foundation has contributed US\$3.3 million between 2002 and 2020, on several topics: HIV, malaria, agricultural development, 'Global health and development, public awareness and analysis'. The BMGF is also a partner of the Davos Forum, where Gates has spoken on several occasions. In addition, the two organisations, in partnership with the Center for Health Security at Johns Hopkins University's Bloomberg School of Public Health, have organised a (self-fulfilling) simulation of a global pandemic on 18 October 2019, entitled 'Event 201'.

• **The 5th NGO, the European Climate Foundation**, was funded not by Gates, but by the Open Society. In 2019, Soros' NGO granted it US\$3.3 million.

• **6th position is again held by the Deutsche Stiftung Weltbevölkerung (German Foundation for World Population).**

• **The 7th NGO, the British organisation Portia Ltd**, does not appear at first sight to be funded by the BMGF. However, a quick search on the Portia website reveals that it was founded in 2001 'by a group of women scientists at Imperial College London'.



Insert and table on the right >
36. See also the evaluation by a software developer on the Lockdown Sceptics website. The code has been published on GitHub.
37. Funded by Soros' Open Society. However, we have left it greyed out to avoid any bias, as the focus here is on the Gates Foundation.

Further information about Imperial College London

Since 2002, Imperial College London has received 70 grants from the Gates Foundation, totalling more than US\$280 million. This includes a grant of US\$79 million awarded in March 2020 for the fight against malaria, spread over 60 months (5 years). Imperial College is registered with the Commission as a Category IV entity, 'Think tanks, research and academic institutions', and more precisely as an 'academic institution'. For the August 2019 to July 2020 financial year, Imperial College London has been allocated a budget of over €39 million, all from public funds via the European Commission (see screenshot below). This allocation was made prior to the institution's inclusion on the Register on 7 September 2020.

Financial data			
Financial year:		08/2019 - 07/2020	
Estimate of the annual costs related to activities covered by the register:		50,000 € - 99,999 €	
Total budget:		39,129,480 €	
of which public financing:		39,129,480 €	
Most recent financial information about funding received from the EU institutions:		Procurement: €	Source:
		Grants: 39,129,480 €	Source: European Commission

On its website, Imperial College describes its role in relation to the Commission and more specifically Horizon Europe (2021-2028), the successor to Horizon 2020: 'The European Team, acting as a specialist unit within the Research Office, provides advice on the funding of European research and innovation. The European Team is responsible for pre-award assistance to European research projects, as well as managing the grant agreement process, negotiating the consortium agreement and amending them as required throughout the life of the project. If you are planning to submit a proposal to Horizon Europe, the team will be happy to discuss it'.

It is important to note that the head of the UK Scientific Advisory Council, epidemiologist Neil Ferguson, was employed at Imperial College. According to Le Figaro on 5 May 2020, Ferguson 'played a major role in convincing the government to impose lockdown measures'. However, he was forced to resign after breaching the lockdown to see his girlfriend. A few weeks earlier, Imperial College had predicted that 500,000 people could die from COVID-19 in the United States, before changing its mind shortly afterwards. On 25 March 2020, The Telegraph quoted Ferguson as saying that 'up to two-thirds of the people who will die from coronavirus in the next nine months are likely to have died this year from other causes'.

However, the most significant challenge to Imperial College's credibility stems from other factors. The Ferguson predictive model, which projected 500,000 deaths in the UK if a lockdown was not implemented, contained numerous bugs, rendering its results unreliable. On 7 May 2020, the Axis of Easy website described it as 'shitcode', i.e. poorly written code riddled with errors. The article is extensive and technical (36), but we will summarise the main points: with identical inputs and initial parameters, the code can produce different results because of its many bugs, rendering it unusable for scientific purposes. A team from the University of Edinburgh tried to optimise the code while keeping the same input data, but this resulted in variations in the output, tripling the number of deaths compared with the actual number. The team reported this issue to Imperial College, which, according to the article, was already aware of it. However, Imperial College rejected the information, describing the variations as 'minor non-determinism'. The article also noted that 'another team found that the results varied depending on the type of computer used for the analysis'.

Synthesis:

Crue	Wellcome Trust	World Economic Forum
European Climate Foundation ⁽³⁷⁾	Deutsche Stiftung Weltbevölkerung	Portia Limited
Solar Impulse Foundation	Climate Action Network	European Regions Research and Innovation

Budget & human resources

The **BMGF once again took first place**, with 5 meetings. The topics that were explored included development funding, the non-EU investment plan, the European Union's multiannual financial framework — a notable point given the Gates Foundation's status as an American NGO. Other discussions encompassed European research policy and support for humanitarian projects, and humanitarian aid policy. **The Open Society European Policy Institute (OSEPI) holds second place** with 4 meetings, including sessions on the EU's multi-annual financial framework, a meeting with George Soros on the sidelines of the German Marshall Fund's Brussels Forum, and the conditionality of the European budget plan. **ILGA-Europe, supported by OSEPI, tied for 3rd place. ONE tied for 6th place with Bertelsmann Stiftung.**

The von der Leyen Commission

The same procedure applies to the von der Leyen Commission. **The Gates Foundation ranks 4th in the list of meetings** with the Commission Presidency (4 meetings).

• **The Coalition for Epidemic Preparedness Innovations (see details below) and the WEF are joint second.** The WEF has close ties with the Gates Foundation.
• **In 5th place is the Pandemic Action Network (PAN)**, an NGO incorporated under US law and registered only since 18 June 2020. PAN has 71 members, including some influential ones such as the Gates Foundation. The BMGF and the Johnson & Johnson pharmaceutical group are also founders. The profiles of its co-founders are also noteworthy:

- **Eloise Todd:** Policy Adviser for the S&D Group in the European Parliament (2002-2007), Director for Global Policy at ONE (38) (2007-2016), CEO of Best for Britain (2017-2019, an NGO dedicated to maintaining the UK's membership of the European Union).
- **Gabrielle Fitzgerald:** former member of the Gates Foundation and USAID, and speechwriter for Bill Clinton at the White House.
- **David Kyne:** influential communicator and former member of Hill+Knowlton Strategies.
- **Caroline Reynolds:** former senior consultant, notably to the World Bank and the WHO.

***Note:** the 8th, 9th and 10th positions for meetings with the Presidency are occupied respectively by the Open Society European Policy Institute (OSEPI), GLOBSEC (an Open Society partner) and Access Now (funded by the Open Society).*

BMGF also features in the top 10 meetings for the other three portfolios in which it has invested since the new commission:

- **A stronger Europe in the world:** 8th position.
- **Innovation & Youth:** 9th position.
- **International partnerships:** 10th position.



38. Reminder: funded in particular by the Gates Foundation and the Open Society, and co-founded by Bono, a staunch supporter of George Soros whom he considers 'a giant'.

39. Formerly GAVI, for Global Alliance for Vaccines and Immunization.

40. His talk was on the subject of 'Vaccinating the world: from mass production to last-mile delivery'.

41. An NGO co-founded by Andrea Soros Colombel, the daughter of George Soros, who was its director and still sits on its Board.

42. A Fellow is a member of the teaching staff of a university college. He or she may be either a professor or a researcher.

43. And not 3 meetings as announced by Transparency International on Integrity Watch.

44. Team Europe aims to combine the resources of the European Union, its Member States and financial institutions, the European Investment Bank and the European Bank for Reconstruction and Development.

Around the Gates Foundation : Gavi, the Vaccine Alliance

The influence of an NGO is not limited to its own actions or those of its network of affiliated NGOs (type III entities). Gavi, the Vaccine Alliance (hereinafter referred to as Gavi (39)) is a category VI entity, 'Organisations representing local, regional or municipal authorities, other public or mixed entities, etc.', and more specifically, 'Other public or mixed entities, created by law, whose purpose is to act in the public interest'. Gavi was established in 2000 at the World Economic Forum as a public-private partnership, as CEO Seth F. Berkley recounted in his speech in Davos in 2021 (40). The first contracts were signed at that time, and Berkley recalled that discussions had focused in particular on the formation of the COVAX initiative (for the 'COVID-19 Vaccine Global Access'), which is presented as 'the "vaccines" pillar of the access to COVID-19 tools accelerator (Accelerator-ACT)'. There are a number of milestones in Seth Berkley's career: associate director (epidemiology, public health, vaccination - among others) at the Rockefeller Foundation, where he worked for eight years, listed as one of the 100 most influential people in the world by the Times in 2009, named one of Fortune's 'Global Forum Visionaries' in 2010, a member of the international steering committee of the pharmaceutical company Gilead, a member of the New York Academy of Sciences, a member of the Acumen Fund (41) - funded by the Gates Foundation through six grants since 2006 for a total of more than US\$18 million - and a member of the highly influential Council on Foreign Relations. Berkley is also a fellow (42) of the American College of Physicians, the Infectious Diseases Society of America and the Massachusetts Medical Society, and a former member of the executive board of OXFAM America. Finally, he is the founder - at the instigation of the Rockefeller Foundation - and former CEO of the International AIDS Vaccine Initiative (IAVI), funded by the Gates Foundation (nearly US\$400 million via 30 grants since 1998), several governments, USAID and the Coalition for Epidemic Preparedness Innovations (CEPI, see the next sub-section of this study). Gavi was opportunely registered in the European Commission's Transparency Register on 27 January 2021, against a backdrop of debate about the COVID-19 vaccine. A reading of the list of Gavi's meetings with Commission officials also shows that this entity seems to have received preferential treatment. Two meetings predate the organisation's registration:

- 09 April 2020: meeting with Commissioner Jutta Urpilainen on the issue of COVID-19.
 - 22 December 2020: meeting with Renaud Savignat, member of Jutta Urpi-lainen's cabinet, for an update on COVAX.
- In total, Gavi obtained 8 meetings (43), including seven between 22 December 2020 and 2 March 2020, almost all of which were on COVAX. Prior to its official registration in June 2020, the European Commission had already committed a donation of €300 million to Gavi for the 2015-2021 period, with the aim of immunising 300 million children worldwide and funding the stockpiling of vaccines to protect people against infectious diseases. Ursula von der Leyen stated: 'I am delighted that the European Commission can support Gavi in this crucial effort. This will help us to overcome the current pandemic and avoid another one. On 15 December 2020, Team Europe (44) decided to contribute €500 million to the COVAX initiative 'to provide one billion doses of COVID-19 vaccine to low- and middle-income countries', making the European Union its main donor. This amount was doubled two months later, bringing the EU's contribution to one billion euros. The announcement of this funding extension was made by the Commission in a press release on 19 February 2021, the day after a video conference between Gavi and the Commission regarding COVAX.

COVAX

COVAX is co-led by four organisations funded by the Gates Foundation:

• **Gavi.** Gavi has received considerable financial support from the Gates Foundation, with a total of over US\$3 billion in a dozen direct grants since 2003, primarily aimed at 'providing solutions to improve global health'. The European Commission has also been a long-standing partner in funding Gavi, contributing a total of over US\$83 million since 2003. The Commission also states that 'as a public-private partnership, Gavi represents all stakeholders in global immunisation: donating and implementing governments, WHO, UNICEF, the World Bank, the Bill & Melinda Gates Foundation, civil society, the immunisation industry and private companies'. We will report here on two of the Gates Foundation grants as detailed by the Foundation:

Direct beneficiary: GAVI Alliance. Grant amount: US\$ 150 million; date: December 2020; duration: 116 months (i.e. 9 years and 8 months). Purpose of the grant: “To reduce the impact of the COVID-19 pandemic in low-, middle-, and high-income IDA-eligible economies (46) by accelerating the introduction and widespread use of vaccines that protect against COVID-19.”

Direct beneficiary: Inventprise LLC. Grant Amount: US\$612,000; Date: March 2021; Duration: 10 months. Purpose of grant: “To initiate additional vaccine production as part of the GAVI (Vaccine Alliance) COVAX Advance Market Commitment, a funding mechanism through which GAVI aims to ensure equitable access to COVID-19 vaccines for 92 low- to middle-income countries. (47)”

• **CEPI.** BMGF has funded CEPI three times since 2017:

- Vaccine development (2017, for 8 months): **US\$1.98 million.**
- Vaccine development (2017, for a period of 62 months - i.e. 5 years and 2 months): **US\$98 million.**
- Translational science and discoveries, vaccine development (2020, lasting 26 months): **US\$20 million.**

• **WHO.** During Trump's withdrawal, the Gates Foundation became the main funder of the WHO. The total value of the 452 grants awarded to the WHO by the BMGF since 1998 amounts to several billion dollars.

• **UNICEF.** The Gates Foundation has awarded 170 grants to UNICEF since 1999, totalling several hundred million dollars.

Gavi, CEPI and WHO are also the financial backers of COVAX.



45. We have not considered donations made to other organisations earmarked for the purpose of working with GAVI.

46. IDA = World Bank International Development Association.

47. LMIC : Low-to-Middle-Income Country.

48. Underlined by the Commission, which refers to its communication JOIN(2020) 22 final of 02/12/2020, 'A new EU-US agenda for global change'. This already set the tone: 'The EU invites the United States to join the global response and its “vaccines” pillar, the COVAX mechanism. The aim is to ensure that safe vaccines are distributed equitably to the more than 180 participating countries, wherever they are and whatever their means. The goal is to have 2 billion doses available by the end of next year, with equitable access for low- and middle-income countries. US participation and financial contribution to COVAX would send a strong message, help close the funding gap and improve our collective chances of success.' One of the first steps recommended was as follows: 'The EU and US should secure funding for the development and equitable distribution of vaccines, tests and treatments globally, starting with participation in and contribution to ACT-A and COVAX.'

49. The Wellcome Trust, while relatively obscure to the general public, is a formidable actor in the field of medical research, both human and veterinary.

On the regulatory side, COVAX has benefited from a number of loopholes, such as the Commission Implementing Regulation (EU) 2021/111 of 20 January 2021, ‘making the export of certain products subject to the presentation of an export authorisation’. Paragraph 5 of Article 1, ‘Export authorisation’, states that on the basis of the principle of solidarity, several exports are not subject to the provisions of the first two paragraphs of the article.

The first article states in particular that ‘an export authorisation drawn up in accordance with the form set out in Annex I shall be required for the export of the following Union goods within the meaning of Article 5(23) of Regulation (EU) No 952/2013 of the European Parliament and of the Council (3): vaccines against SARS coronavirus (SARS-CoV species) falling within CN code 3002 20 10, whatever their packaging. This also applies to the active substances, including the primary and working cell banks used to manufacture these vaccines. COVAX is one of the beneficiaries, as specified in paragraph 5 :

—exports to low- and middle-income countries on the AMC COVAX list.
—exports of goods purchased and/or delivered through COVAX, UNICEF and the Pan American Health Organization (PAHO) to any other country participating in COVAX.

These provisions are in line with the objectives set out in a Commission communication dated the previous day, 19 January 2021, ‘A united front to defeat COVID-19’. In point 4, ‘Ensuring European leadership and international solidarity’, the Commission writes that ‘the recently proposed new EU-US programme for global change (48) will provide the basis for a strong EU-US commitment and contribution to COVAX. The EU-led Trade and Health initiative within the World Trade Organisation should facilitate the delivery of vaccines and other medical treatments to where they are most needed’. The second of the three key actions states that ‘the European Commission and Member States should continue to mobilise support for COVAX’.

Gates & World Economic Forum networks: the Coalition for Epidemic Preparedness Innovations (CEPI)

The Coalition for Epidemic Preparedness Innovations (CEPI) was launched in January 2017 at the World Economic Forum (WEF). The organisation's last fiscal year (January 2019 - December 2019) saw a budget of €188.7 million, of which €168.6 million was public funds. During the same period, CEPI also received €18.9 million from the European Commission's Horizon 2020 programme.

The stated aim of the coalition is to produce vaccines that will speed up the global response to epidemics, as set out in the January 2017 press release. This means creating vaccines that can be deployed rapidly in the event of an epidemic. Bill Gates commented: 'Unfortunately, although there is a significant risk of an epidemic, there is no natural market for vaccines. You need to get governments to create the right incentives. Anticipating future pathogens and stockpiling vaccines would be a very good response.' The official journal of the Royal Pharmaceutical Society reported on the same date that the primary aim of CEPI was to develop vaccines 'to prevent coronavirus-related Middle East Respiratory Syndrome (MERS-CoV) and the Lassa and Nipah viruses, all of which have the potential to cause serious epidemics'. **CEPI** is a public-private initiative. The public side is comprised of the Norwegian and Indian governments (it presents itself as a Norwegian association; it should be noted that there is a close link between the Norwegian government and the Gates Foundation), while the private side is made up of the WEF, the Bill & Melinda Gates Foundation (BMGF) and the Wellcome Trust (49).

Since its creation, CEPI has received funding from many other countries, as well as from USAID. It also receives funding from companies and from the United Nations via the UN Foundation COVID-19 Solidarity Response Fund (50). In terms of leadership, CEPI has at least two members directly linked to the US administration:

- **Nicole Lurie**, Strategic Advisor to the CEO. From 2009 until the end of Obama's second term, she worked at the Under Secretary for Preparedness and Response at the US Department of Health and Human Services.
- **Richard Hatchett**, CEO. He has held a number of senior positions in US medical agencies. He also served on the White House National Security Council under George W. Bush and was a member of the White House National Security Team under Obama. Hatchett also spoke at the World Economic Forum in January 2021, on the theme: A grand new contract in health and healthcare (51).

In parallel:

- **Richard Wilder**, CEPI's General Counsel and Director of Economic Development, previously held the same position with the Gates Foundation's Global Health Programme. His relationship with Bill Gates goes back further, as Wilder was also Associate General Counsel for Intellectual Property at Microsoft.
- **Samia Saad**, Director of Resource Mobilisation and Investor Relations, was previously BMGF's representative on CEPI's Board of Investors. For the previous seven years, she developed and led the BMGF's global health R&D programme, as well as the policy and advocacy strategy for epidemic preparedness.

The NGO's scientific advisory committee also includes two members with voting rights who are linked to BMGF.

The non-voting members are from pharmaceutical companies: MSD (and Wellcome Trust), Pfizer, Johnson & Johnson and Sanofi Pasteur. A fifth is a member of the WHO.

Finally, CEPI includes a Joint Coordination Group, 'a roundtable of independent institutions with an interest (or desire) in the successful development and deployment of CEPI vaccines during an epidemic'. The rest of the presentation is of interest: the members of the group 'come together to discuss how best to improve our attempts to supply and deploy vaccines by addressing challenges related to R&D, legislation (52), storage, and delivery of these products. While the group's primary focus is on advancing the CEPI vaccine portfolio, its work also extends to broader areas of vaccine development and preparation, with members playing a role in planning a rapid response to priority or unknown pathogens.' It is noteworthy that the member organisations of this group are presented as independent, although this may not be the case for several of them, given the funding they receive from the Gates Foundation, WHO, Gavi and UNICEF. Two other organisations should also be mentioned:

- **The International Federation of Red Cross and Red Crescent Societies** has received approximately US \$24.5 million from the BMGF, distributed across 10 grants since 2000.
 - The **AVAREF** (African Vaccine Regulatory Forum, initially set up by the WHO in 2006) has benefited from two indirect subsidies.
- The other members of the group (including Wellcome) have not received funding from the Gates Foundation, but potentially from other organisations. CEPI's description of these organisations as independent therefore seems inadequate at best.

50. This fund is supported by a large number of companies from a variety of sectors, including multinational pharmaceutical companies (The Pfizer Foundation, MSD, GSK, Johnson & Johnson)..

51. The url to this link refers to 'Preparing for a Great Reset in healthcare'. This session also features contributions from - among others - Albert Bourla, CEO of Pfizer, and Tedros Adhanom Ghebreyesus, Director of the WHO.

52. Our emphasis.



Is Bill Gates' influence on the Commission a danger for French nuclear power?

The news and hype surrounding green taxonomy represent a decisive issue for the future of French nuclear power. However, in addition to lobbying by companies in the renewable energy sector and NGOs and think tanks funded by similar stakes, Bill Gates' interests are also playing their part. Bill Gates founded TerraPower in 2006, a developer of miniature nuclear reactors (350 MW compared to 900 MW for French reactors), with the collaboration of General Electric, Hitachi, and the billionaire's investment fund. The project involves 4th generation molten-salt reactors, which use liquid fuel dissolved in molten salt. This approach stabilises the reaction, making the process more secure, and facilitates the reuse of waste. The initiative is being undertaken in collaboration with Pacific Corp, an enterprise owned by Warren Buffett, who until recently served as a board member of the Gates Foundation. However, the Gates Foundation's previously demonstrated influence with the Commission raises doubts as to the benevolence the Commission is likely to show towards the billionaire, facilitating his room for manoeuvre to the detriment of French and European nuclear sovereignty. In support of this hypothesis, we can point to a new entity - Boundary Stone Partners - registered in the Commission's Transparency Register on 29 September 2021 as a Category I entity, 'Professional Consultant'. In 2020, the entity's client was TerraPower, which spent between €100K and €200K on lobbying related to nuclear energy policies.

ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=407028044237-27

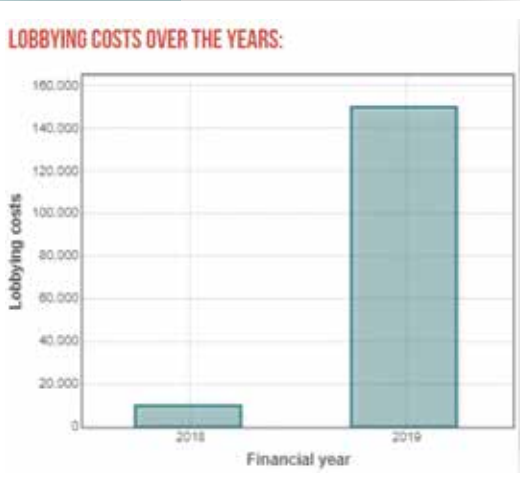
About Find out more Register or update Conditionality and other transparency measures Complaints EP accreditation Contact us			
Clients in the closed financial year:			
Name	Revenue	EU legislative proposal	
TerraPower	100,000 - 199,999	Policies relating to nuclear power	
Clients in the current financial year:			
Name			
TerraPower			

In addition, this consultancy explicitly states on its website that it is close to the highest levels of American power:

Boundary Stone Partners was founded by two former Chiefs of Staff at the United States Department of Energy.

They served under President Obama and Vice President Biden during a period of transformative technology innovation, government investment, and crisis that put them in the center of the action.

Collectively, our team has approved and closed tens of billions of dollars in clean energy transactions, developed federal policy, helped U.S. companies navigate foreign markets, managed federal research, development and deployment programs, and raised capital. We have held senior positions at the White House, the Department of Energy, the Department of Commerce, the Department of Transportation, Department of Agriculture, National Security Council, Office of the United States Trade Representative, Congress, Big Tech companies, and major investment banks.



53. We will list them all here, to show whose voice is being represented by this 'NGO' that is the WEF: Agence Française de Développement (AFD), Bank Lombard Odier & Co, Boston Consulting Group (BCG), Capricorn Investment Group, The Conduit, Crédit Suisse, European Commission, Ferd (a Norwegian company), UK Foreign and Commonwealth Office, Global Steering Group for Impact Investment, Gulf International Bank (GIB), IKEA Foundation, International Committee of the Red Cross, International Finance Corporation, Islamic Development Bank, Japan International Cooperation Agency (JICA), Mastercard, Netherlands Ministry of Foreign Affairs, Overseas Development Institute, The Rise Fund, The Tony Elumelu Foundation, the United Nations High Commissioner for Refugees (UNHCR), the United Nations Office for the Coordination of Humanitarian Affairs (OCHA), the United Nations World Food Programme (WFP), USAID, the World Bank and the World Economic Forum.

World Economic Forum

The WEF, with 7 meetings between 1 April 2020 and 11 November 2020, met twice with Kurt Vandenbergh, including on 9 June 2020 (as did the BMGF). The other meetings concerned the following portfolios:

- **An economy at the service of people** (2 meetings), for the European response to COVID-19.
- **A Europe fit for the digital age** (1 meeting) to discuss Europe's digital strategy for the post-COVID-19 recovery period.
- **Financial services, financial stability and capital markets union** (1 meeting): agreement on post-COVID-19 trade.
- **Crisis management** (1 meeting): Humanitarian and Resilience Investing (HRI) Initiative / COVID-19.

The Humanitarian and Resilience Investing (HRI) Initiative and the European Commission

The World Economic Forum is co-chairing this initiative. On its dedicated page, the WEF mentions several crisis situations (climate, wars, COVID-19) to underline, in its view, the need to go beyond traditional humanitarian responses. As a complement, the Forum suggests '[releasing] part of the US \$200,000 billion of private capital invested to finance investments that generate a return [on investment]'. The HRI, the WEF goes on, 'aims to speed up and shape the market for investments that improve resilience and support humanitarian response in fragile contexts'. The HRI initiative was presented at the Davos Forum in January 2019, launched by the WEF, the World Bank and the International Committee of the Red Cross. The presentation states that this new initiative builds, among other things, on the successful implementation of new financial products such as the Humanitarian Impact Bond or the Famine Action Mechanism.

The initiative's partners tend to indicate that the WEF serves as a cover for interests that are primarily economic. Thus, the registration of the WEF as a Category III entity is questionable, along with the many trusts that serve as screens for interests firmly rooted in the business sphere. The influence of the WEF's meeting with the European Commission on this initiative and its approach to COVID-19 seems to be a foregone conclusion. The Commission is one of the many partners in the HRI initiative (53).

On 15 October 2020, the WEF published a press release to put the initiative back at the top of the agenda: 'Humanitarian and Resilience Investing in the COVID-19 era'. The statement intertwined the pursuit of the Sustainable Development Goals, the HRI initiative and COVID: despite the pandemic, it stated, substantial investment capital remains available to finance and bridge the gap linked to the SDGs. In addition, the COVID-19 crisis led to a 350% increase in the issue of social bonds. The press release stresses the need to continue to attract and seek the contribution of the private sector ('sustainable and inclusive private solutions') to meet humanitarian needs. It goes on to specify the need to 'strengthen the expertise and capacity of donors and humanitarian and development actors to stimulate private investment by sharing or developing tools, data and skills'.

On 10 March 2021, the European Commission issued a communication to the European Parliament and the Council of the European Union entitled 'On European Union humanitarian action: 'new challenges, same principles'. This document employs a similar tone to the HRI, citing 'humanitarian needs at an unprecedented level' as a result of climate change, the resurgence of state conflicts, environmental degradation, demographic growth and the failure of governance. The report highlights the exacerbating impact of the COVID-19 pandemic, underscoring the urgent need for additional resources to address the surge in humanitarian needs. The Commission is calling for the list of donors to be expanded, but it is the rest of the Commission's communication that sheds light on its role as a sounding board for the WEF initiative:

'The European Union should also explore ways to better promote and involve the private sector (54) in the provision of services to people affected by humanitarian crises, where relevant. A number of innovative initiatives have been launched in recent years by humanitarian actors, including pioneering tools such as humanitarian impact bonds (55). Significant progress has been made in the use of insurance and reinsurance for disaster risks. However, the European Union has the potential to enhance its efforts by collaborating more closely with the private sector to generate additional funding for the humanitarian response.'

The Commission goes on to stress that, building on the work to which it has contributed in multilateral meetings, it will strive to introduce innovative methods of financing into its humanitarian toolbox and will actively promote the involvement of the private sector in humanitarian financing. In its note 57 on multilateral relations, the Commission specifically mentions its membership of the WEF's Humanitarian and Resilience Investing Initiative.

54. Emphasised by the Commission.

55. Humanitarian Impact Bonds were mentioned favourably in a WEF White Paper dated January 2021.

56. Another member of the Commission also spoke at the Davos Forum 2021, Valdis Dombrovskis, Executive Vice-President in charge of the 'Economy at the service of people' portfolio, on the topic of 'Building on the European advantage in the green transition'.

57. This is not the only meeting of European officials where the transparency of the meetings between Davos and these officials is lacking. The Commission's weekly calendar of activities reports others - although it notes that the schedule is subject to change.

January 2021: Von der Leyen in Davos

With regard to the influence of Davos on policy-making at European Commission level, the question seems rhetorical. Ursula von der Leyen, President of the European Commission, has been a member of the World Economic Forum's Board of Directors since 2013, which facilitates the adoption of the Davos approach at EU level. On 26 January 2021, von der Leyen delivered a video-conference speech at the WEF 'alongside' Klaus Schwab, which lends further credence to this hypothesis. However, this invitation from the founder of the Forum, which combines different genres, does not figure among the reported meetings between European officials and the WEF. Von der Leyen, who had already been present the previous year - among other things to present the European Green Deal and discuss digitisation; in 2021, said that the pandemic had accelerated this process - and after a 'Dear Klaus' introduction, gave a speech in line with the WEF's policy. Here are the highlights: 'The World Economic Forum is the best place to understand the trends in our society and to understand what entrepreneurs, communities, NGOs and other partners are thinking about. It's also here that we can understand how we see the future at this moment in time [...] And this year, the World Economic Forum is once again asking the right questions thanks to your initiative, The Great Reset. We need to learn the lessons of this year, change the way we work, the way we live, the values we cherish, and what they are. [...]

NB: Although the WEF was still listed in the Transparency Register on 5 May 2021 (the date on which we downloaded the record of its meetings with the Commission), it was subsequently absent for a brief period, before being re-registered on 2 July 2021. This date therefore does not correspond to its registration as a lobbyist, but to its renewed registration. However, the PDF file of World Economic Forum meetings presented on the Transparency Register form, issued by the Commission, contains misleading information. This new file shows only three meetings between the WEF and the Commission, between 1 June 2021 and 7 October 2021 (at the date of writing, 27 October 2021). In contrast, the previous PDF file, which is in our possession, reports 39 meetings between the WEF and the Commission, spanning from 15 October 2019 to 9 April 2021.

In order to locate an earlier record of the WEF's presence, it is necessary to refer to Integrity Watch (for example, using the Wayback Machine to access the recording of 13 March 2021), the file of its meetings that was downloaded, or its file on the Lobby Facts website (on its meetings file and on this site one can also find the number under which the World Economic Forum was registered).

Last update: 05-05-2021					
List of meetings "World Economic Forum" has held with Commissioners, Members of their Cabinet or Director-Generals since 01/12/2014 under its current ID number in the Transparency Register "04900636194-17".					
Nr	Commission representative	Portfolio	Date	Location	Subject(s)
1.	Vahid Constantinides, Executive Vice-President	An Economy that Works for People	09/04/2021	video conference	Net Zero economy and green transition of economy; Sustainable finance and green



Early enough in the pandemic, the European Union, organisations such as the Forum or the Gates Foundation, Global Citizen, organised ceremonies to pledge funds. With the COVAX alliance, the European Union and 186 other countries will provide access to vaccine doses for less developed countries. [This is what we are working towards, and I know I can count on you, the World Economic Forum, to make it happen. I hope to continue this discussion with you, Klaus, when we meet in person in Singapore in May, and I thank you very much for your attention.] Schwab concluded his speech by expressing his satisfaction that von der Leyen has put the European Union on the road to the Great Reset through the Green Deal and the policies she has outlined: "When I proposed the term 'reset', many people asked me 'but what does it actually mean? Well, now I can say to them, 'listen to the speech that the President of the European Commission gave today'.

What is Global Citizen?

Global Citizen is the NGO that has had the most meetings with von der Leyen Commission officials so far. Ursula von der Leyen mentioned it as one of the NGOs she works closely with. However, Global Citizen was only added to the Transparency Register on 14 May 2020. Like the Gates Foundation, it is an NGO incorporated under US law and based in New York. Like the Gates Foundation, it does not have an office in Brussels.

In 2020, Global Citizen had six people working on EU activities (11 in 2021), equivalent to three full-time equivalents (3.16 in 2021). Its areas of interest are climate change, humanitarian aid and civil protection, budget, international cooperation and development, and external relations. It also has an annual budget of €46 million.

Its European lobbying activity is increasing. Global Citizen's entry on the Lobby Facts website, which has not been updated since the 2019 figures (58), shows this NGO as having four people for 1.25 FTE, with lobbying expenditure (before being included in the Transparency Register) of between €10,000 and €24,999. For 2020, the Transparency Register shows lobbying expenditure of between €100,000 and €199,999. Like the Gates Foundation, Global Citizen did not participate in any public consultations, roadmaps, European Union structures or platforms, unofficial European Parliament intergroups and groupings, or European Commission expert panels. The main EU legislative or policy proposals that the NGO is targeting are the EU's Multiannual Financial Framework (more specifically in relation to Official Development Assistance), the COVID funding campaign, and the European Union-Africa partnership negotiations. As for 'policy implementation, outreach and communication activities such as projects, events and publications', the only activity listed by Global Citizen is 'support for the global campaign against COVID'.

The pdf file of the NGO's meetings with Commissioners highlights the pre-eminence of meetings between Global Citizen and Ursula von der Leyen. Between 24 May 2020 and 20 February 2021, Global Citizen had 11 meetings with the Commission:

Two came under the Economy portfolio and consisted of an update on the Debt Services Suspension Initiative (DSSI) and the post-DSSI framework programme.

Nine met with Ursula von der Leyen:

• 12 June 2020: two meetings: the first with the CEO of Global Citizen (i.e. Hugh Evans, also co-founder; since 2009), the second with the CEO of Amgen (world leader in the medical biotechnology industry) and that of Teneo (public relations and consultancy firm). The topic was preparations for the Global Pledging Summit on 27 June 2020. This event consisted of a meeting of world leaders and a concert. It was organised as part of the 'Global Goal: Unite for our Future' campaign launched by the European Commission and Global Citizen on 28 May 2020. On the NGO side, the campaign was supported by Bloomberg Philanthropies, the Bill & Melinda Gates Foundation and the Wellcome Trust. On the corporate side, it has received support from Corporate Partners Citi, Procter & Gamble, SAP, Verizon and Vodafone (59). The aim: to raise funds to develop and distribute vaccines, tests and treatments against the coronavirus. The contributions announced for 27 June were to support the following organisations:

58. On 26 May 2021.

59. Citi, Procter & Gamble and Verizon are among Global Citizen's main backers.

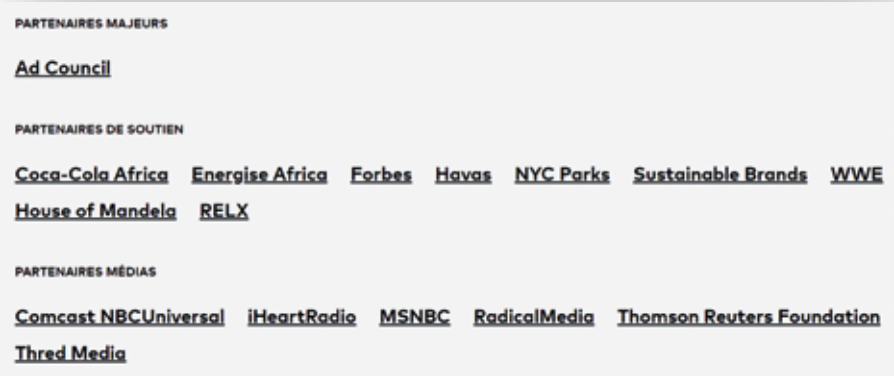
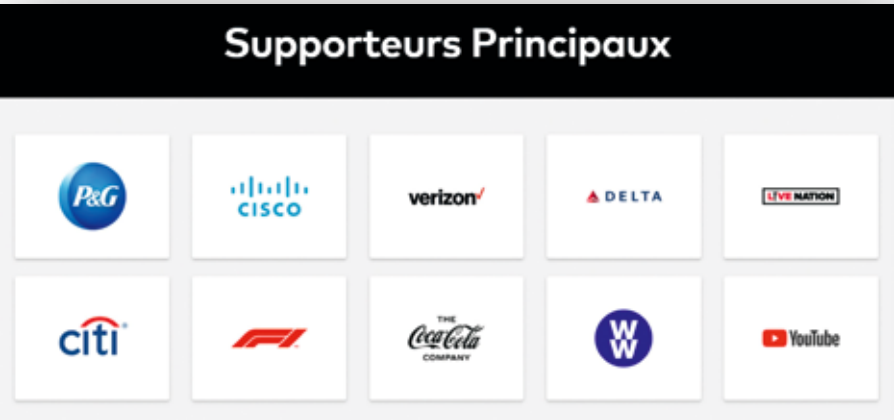
- [Coalition for Epidemic Preparedness Innovations \(CEPI\)](#)
- [The Foundation for Innovative New Diagnostics \(FIND\)](#)
- [GAVI, the Vaccine Alliance](#)
- [The Global Fund to Fight AIDS, Tuberculosis and Malaria](#)
- [Therapeutics Accelerator](#)
- [UNITAID](#)
- [WHO's COVID-19 Solidarity Response Fund](#), powered by the UN Foundation
- [The International and Regional Response Network](#)



- On 17 June 2020, a few days before the summit, the European Commission published a statement on the 'European Union strategy for vaccines against COVID-19'. The text explained that 'by the end of May 2020, the pledge campaign launched by the Commission had raised €9.8 billion, to which it has contributed €1.4 billion (including €1 billion from its Horizon 2020 framework programme for research and innovation), with the aim of providing universal access to affordable vaccination, treatment and screening for the coronavirus. A second phase is currently underway, in partnership with Global Citizen and other governmental and non-governmental partners. The funds raised are being used to empower and resource existing organisations such as CEPI (the Coalition for Epidemic Preparedness Innovations) and GAVI, the GAVI Alliance for Vaccines and Immunisation, to work in partnership with industry, scientists, regulators and foundations under the ACT framework. ACT is a specific framework that the Commission has helped to put in place to strengthen global collaboration to accelerate the development and global deployment of the tools needed to fight COVID-19.'
- 29 June 2020: Acknowledgements and conclusion of the Global Pledging Summit.
- 21 September 2020: Meeting with Global Citizen CEO to discuss next steps in response to COVID.
- 22 January 2021: Meeting with Global Citizen CEO (no further details).
- 24 January 2021: same as above.
- 5 February 2021: same as above.
- 20 February 2021: same as above.

Hugh Evans co-founded Global Citizen, also known as the Global Poverty Project, in 2008. In 2011, the NGO worked with the Gates Foundation to raise funds for the End Polio campaign. Away from the NGO world, Global Citizen's board of directors is made up of senior executives from the NGO's corporate sponsors and partners: CVC Capital Partners, Cisco, Iconiq Capital, TED, Universal Music and Daniel Green, the Gates Foundation's senior adviser for policy, advocacy and communications. The UK branch of the NGO has also appointed Joe Cerrell, managing director (Europe, Middle East, East Asia) for development policy and finance at the Gates Foundation, to its board. As noted above, Cerrell also sits on the board of The ONE Campaign, the NGO co-founded by Bono.

Global Citizen's partners also have few links with civil society or citizen representation:



The relationship between Global Citizen and the Gates Foundation has grown closer. Since 2012, the Gates Foundation has funded the NGO, still under its former name, the Global Poverty Project, to the tune of over US\$46 million to date. Global Citizen reports that since 2018, it has been a partner in the BMGF's Goalkeepers initiative, whose stated aim is to bring together world leaders to accelerate progress towards the Sustainable Development Goals. Together with its partners, some of whom are household names, the BMGF presents annual awards as part of this initiative. For example, for 2019:

to be part of the nomination process. By tapping into this network of experts we ensure that submissions are high quality and derive from legitimate and trusted sources. The 2019 partners are:

African Youth Networks Movement, Bill & Melinda Gates Foundation (BMGF), Civicus / A4SD, George W. Bush institute, Global Citizen, Goalkeepers Community, Mandela Institute for Development Studies, Obama Foundation, ONE, One Young World, Oxfam, Project Everyone, Restless Development, Save the Children, UNICEF, United Nations Youth Envoy, United Nations Foundation, UNLEASH, Virgin Unite, We Day.



60. The Coalition for Vaccination became effective in spring 2019.

Finally, a press release dated 23 February 2021 reported Ursula von der Leyen's commitment to Global Citizen's campaign 'A Recovery Plan for the World'. Von der Leyen stated: "Let's overcome the pandemic with a global vaccination campaign. Stop the hunger crisis. Let's get children back to school. Let's fight inequality. And let's start a green recovery." A reading of von der Leyen's full speech leaves no doubt about the NGO's influence on the European Commission's direction on these issues: "I am proud to support Global Citizen's new campaign. [...] Global Citizen has already shown that committed and engaged citizens can move mountains. Hugh, you have a unique gift for bringing people together. Let's do it again. As one world. United."

The health pass

The entry into force of this health passport was confirmed by European Commissioner Thierry Breton. A number of points need to be highlighted. As Irish lawyer Ciarán McCollum points out in an article published in the EUObserver on 28 April 2021, this DGC has not been subject to any impact assessment or public consultation, as is customary for the Commission at various stages of the legislative and regulatory process. This does not mean, however, that private consultations have not taken place. This information and the nature of these hypothetical consultations remain inaccessible. But certain clues are available. On 14 January 2021, Business Wire reported that a broad coalition had been formed to 'accelerate digital access to COVID-19 vaccination records'. The system is described as 'reliable, traceable and verifiable', with 'a single platform to ensure secure, traceable operations and build trust with customers and employees, this coalition will be central to supporting public health and well-being'. This coalition, the Vaccination Credential Initiative, includes some major names: CARIN Alliance, Cerner, Change Healthcare, The Commons Project Foundation (which we'll talk about below when we discuss its collaboration with the WEF), Epic, Ever-north, Mayo Clinic, Microsoft (i.e. Bill Gates), MITRE, Oracle, Safe Health, and Salesforce.

Since his appointment as European Commissioner for the Internal Market on 1 December 2019, Thierry Breton and his cabinet have held 710 meetings according to Integrity Watch - a single meeting can bring together several organisations at the same time. While COVID-19 is mentioned several times, the Digital Green Certificate does not appear in any of the discussion topics. This 'topic' is presented under a separate title, but with inaccessible content.

A precedent: the EU roadmap

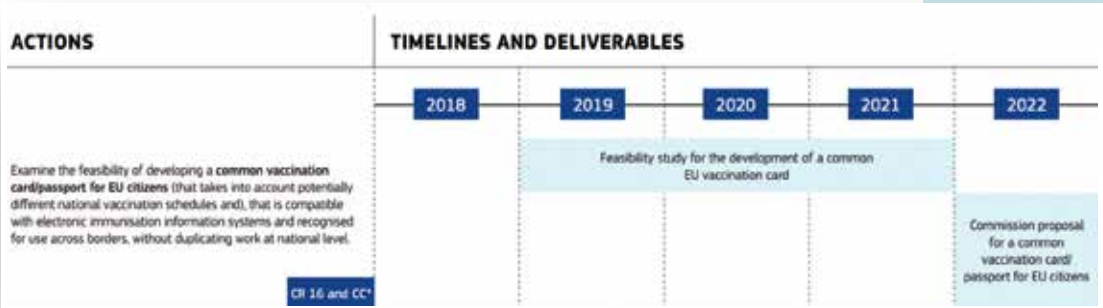
Nevertheless, the idea of a health passport dates back at least to 26 April 2018, when the Commission - whose Commissioner for Health and Food Safety, Lithuanian Vytenis Andriukaitis, was presented by Euractiv in 2019 as a 'vaccine crusader' - called for greater 'European cooperation against preventable diseases'. The Commission's call included 20 actions to be taken by the Commission and Member States. Several of them echo the situation we face today in relation to COVID-19:

- **Introduce routine checks** on vaccination status and regular opportunities for vaccination at different stages of life, for example in schools and the workplace.
- **Present ideas for a common vaccination card** that could be shared electronically across borders.
- **Give health workers the training they need** to vaccinate with confidence and deal with hesitancy.
- **Federate a Coalition for Vaccination** (60) to bring together European associations of healthcare workers as well as relevant student associations in this field, in order to provide accurate information to the public, dispel myths and exchange best practice.

- **Establish a European Information Sharing System** to pool knowledge and develop guidelines for a common European vaccination schedule by 2020, with doses and ages that Member States will accept as common to all countries.
 - **Strengthen partnerships and collaboration on vaccination** with international partners.
- This statement from the Commission to the Council, endorsed on 7 December 2018 by Council Recommendation 2018/C 466/01 (61), provided only one aspect of this ‘vaccination card’. A Commission roadmap (62), spread over 2019-2022 and last amended in the third quarter of 2019, was more precise in its terms: ‘Examine the feasibility of a common vaccination card/passport for European citizens (potentially taking into account different national vaccination schedules and) that is compatible with electronic immunisation information systems, and approved for use at borders, without duplicating this work at national level.’ This feasibility study is supposed to cover the 2019-2021 period, for a Commission proposal in 2022 - which will ultimately have arrived much earlier with the COVID-19 argument:

61. Points 9.a.i and 16.

62. Note: the page in question is problematic. Feedback on the roadmap is available. However, for the public consultation period that followed, this is not the case, and the referral link does not provide the desired information. We had to find another way to get to the dedicated section.



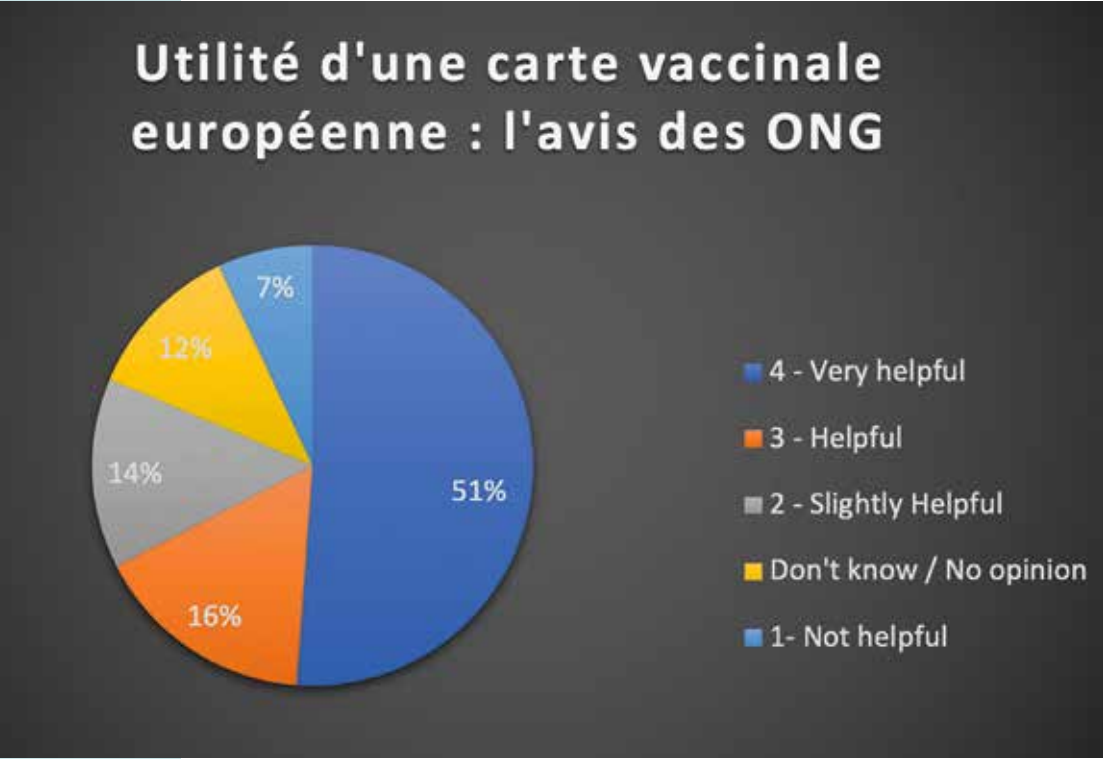
In fact, work on a vaccination card predates 2018. On 4 December 2017, the European Commission opened a roadmap dealing with the topics taken up again in April 2018. European citizens and registered entities were invited to provide feedback. 368 did so, some of which are inaccessible, withdrawn by the Commission for an equivalent of ‘non-compliance with community standards’. The majority of citizens were against compulsory vaccination. Nearly 25 NGOs also expressed their views.

- **Vienna Vaccine Safety Initiative (ViVi)**: called for training of health professionals and advocated digital records, in particular as "an educational tool that empowers patients to become well-informed partners in health protection". The NGO also stated that it "strongly supports the proposal for better alignment and coordination of vaccination systems and schedules in Europe".
- **A prevention study group**: in favour of an electronic immunization record (EIR), in particular to help Member States strengthen their cross-border cooperation.
- **The regional Professional Union of Private Practitioners Auvergne Rhône Alpes**: supports the electronic vaccination record system - and has developed an application for this purpose, MesVaccins Pro.
- **The International Federation on Ageing, a Canadian NGO**, published a text in favour of adult vaccination dated 29-30 August 2017 and written in London. It came out in favour of vaccination cards for each country.

- In particular, **EuroHealthNet** called for ‘strengthening and investing in health education and promotion programmes, involving health professionals and public authorities, using digital tools (such as applications to track vaccination status) and social networks [...]’.
- **France Assos Santé** came out in favour of ‘the introduction of an electronic vaccination record’.
- **The European Scientific Working Group on Influenza**, without mentioning the vaccination card, supported the Commission's initiative.
- **The Standing Committee of European Doctors (CPME)** same as above.

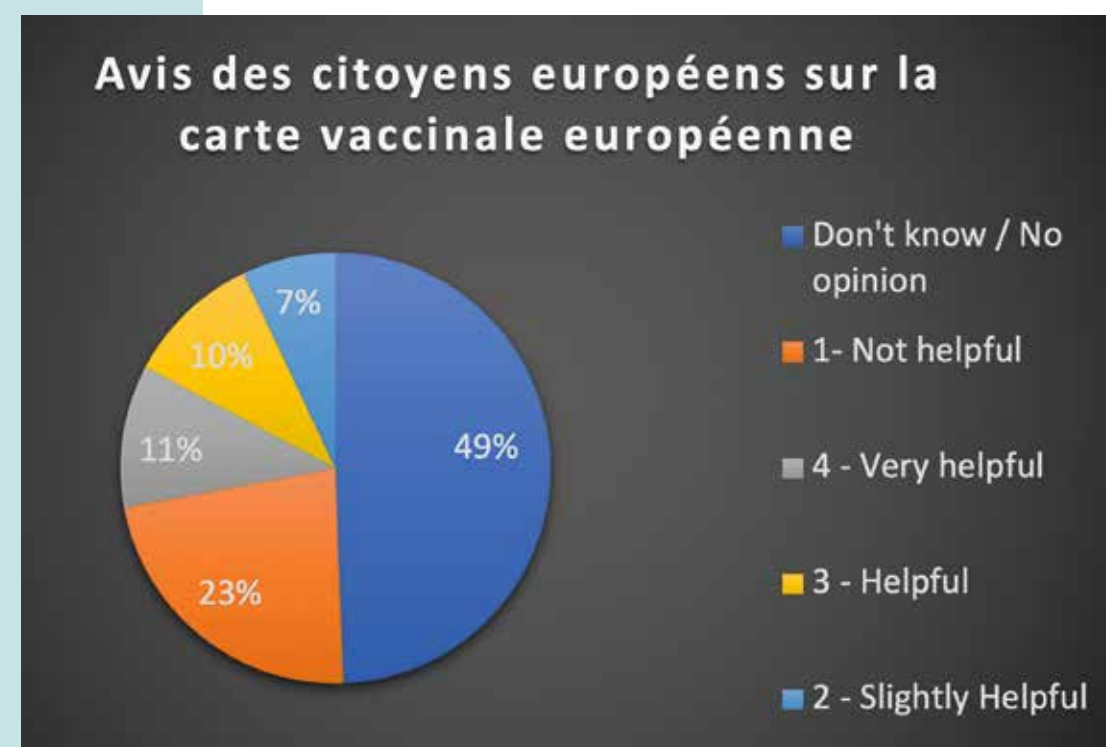
Other NGOs did not comment on the issue of the vaccination card but supported the Commission (e.g. the European Public Health Association). Some NGOs opposed the European vaccination policy: National Health Federation Sweden, Svenska kyrkan, Ensemble pour une vaccination libre, etc. The public consultation on this topic took place from 21 December 2017 to 15 March 2018, the results of which, from the 206 respondents, are still available via an Excel file. Point h of question 1.8, on the introduction of a European vaccination card, is located in the BJ column of the document and is worded as follows: ‘In order to reduce vaccine hesitancy and help EU Member States to increase their vaccination coverage, several activities are listed here for cooperation at European level. [Please rate the usefulness of the following European work: h) Member States are establishing a common approach in favour of a recommended European immunisation schedule, as well as registries and a European immunisation map”.

43 NGOs responded, two-thirds of them clearly in favour of this measure. The opinions were distributed as follows:



NGO name	Opinion
Association of European Cancer Leagues	Don't know / No opinion
European Pharmaceutical Students' Association (EPSA)	Don't know / No opinion
Caravane de la Paix DENYS Président	Don't know / No opinion
Médecins Sans Frontières (MSF)	Don't know / No opinion
Médecins Aux Pieds Nus, association humanitaire internationale	Don't know / No opinion
ASSOCIAZIONE PARTITO DEI VALORI CRISTIANI	4 - Very helpful
Malta Health Network	4 - Very helpful
Malta Medical Students Association	4 - Very helpful
Moige Movimento Italiano Genitori Onlus	4 - Very helpful
Consumers' Association "The Quality of Life" (EKPIZO)	4 - Very helpful
Federation Of Pharmacy Students' Associations from Romania	4 - Very helpful
Sveriges Kommuner och Landsting	4 - Very helpful
EuroHealthNet	4 - Very helpful
European Public Health Association - EUPHA	4 - Very helpful
ASOCIACIÓN SALUD Y FAMILIA	4 - Very helpful
Croatian Society for Pharmacoeconomics and Health Economics (CSPHE)	4 - Very helpful
Hrvatska liga protiv raka	4 - Very helpful
European Institute of Womens Health	4 - Very helpful
France Assos Santé	4 - Very helpful
European Federation of Allergy and Airways Diseases Patients' Associations (EFA)	4 - Very helpful
European Cancer Patient Coalition	4 - Very helpful
Bundesverband Impfschaden e.V.	4 - Very helpful
European Public Health Alliance	4 - Very helpful
AGENCE DE MÉDECINE PRÉVENTIVE - BURKINA FASO	4 - Very helpful
Cittadinanzattiva-Active Citizenship Network	4 - Very helpful
European Health Parliament	4 - Very helpful
European Patients' Forum (EPF)	4 - Very helpful
APETP	3 - Helpful
British Society for Immunology	3 - Helpful
AGE Platform Europe	3 - Helpful
THE ROYAL SOCIETY FOR PUBLIC HEALTH	3 - Helpful
AMP BENIN	3 - Helpful
Global Polio Eradication Initiative (GPEI)	3 - Helpful
European	3 - Helpful
ŠSSFD	2 - Slightly Helpful
1. Coalition for life course immunization, CLCL, current address in UK 2. Employee of National Institution for Public Health and the Environment, The Netherlands	2 - Slightly Helpful
Vzw BMO	2 - Slightly Helpful
FRANCE LYME	2 - Slightly Helpful
Federation of Veterinarians of Europe (FVE)	2 - Slightly Helpful
AGENCE DE MEDECINE PREVENTIVE BUREAU AFRIQUE	2 - Slightly Helpful
Sloboda v očkování	1- Not helpful
Shingles Support Society	1- Not helpful
Alliance for Natural Health International	1- Not helpful

European citizens also gave their opinions. Out of 8,688 opinions, almost half had no opinion, while 23% considered the initiative unnecessary:



> > Among the international organisations also included in the Excel file, it is surprising to note that Gavi did not express an opinion at that time. Between 17 January 2018 and 14 February 2018, the Commission also consulted around thirty stakeholders, including 12 NGOs. They were asked the same question as during the public consultation (column BO in the corresponding Excel file). The opinion of the NGOs was almost unanimous, with 11 of them supporting a European vaccination card:

> It should be noted that the critical NGOs that provided feedback during the roadmap process were not involved, unlike others that were in favour, such as the Vienna Vaccine Safety Initiative and EuroHealthNet.



NGO name	Opinion
CCM Comitato Collaborazione Medica	Very helpful
Koalice pro zdraví / Coalition for Health	Very helpful
SloMSIC Ljubljana	Very helpful
Vienna Vaccine Safety Initiative	Very helpful
European Health Parliament	Very helpful
Confederation of Meningitis Organisations	Very helpful
European AIDS Treatment Group	Very helpful
European Medical Students' Association	Very helpful
EuroHealthNet	Very helpful
Adam détem	Helpful
Groupe d'Etudes en Préventologie	Helpful
European Pharmaceutical Students' Association (EPSA)	Don't know / No opinion

Following these consultations, two stakeholder also expressed their support for these vaccination guidelines in a joint note, 'Vaccination in Europe', dated 18 April 2018:

- **FEAM** (Federation of European Academies of Medicine) has been registered as an NGO in the Transparency Register since 28 May 2009. Its Scientific Council is made up of members of academies of science from several countries.
- **EASAC** (European Academies Science Advisory Council), registered in the Transparency Register on 26 July 2013 as a think tank (category IV entity). EASAC is one of the four branches of the InterAcademy Partnership, which brings together more than 140 regional and national member academies. Their note reviews various points. With regard to vaccination coverage, the card - the future passport - is mentioned in passing: 'More needs to be done to implement a European vaccine register and card'. The card is also mentioned in point 2 of the note's recommendations. However, the opening sentence of the EASAC press release emphasised that this was a key desire of both organisations: 'Europe's national scientific and medical universities are calling for personalised interventions, as well as for a European vaccine register and card'.

As a result of COVID-19, the wording has changed. The vaccine card, also referred to as the vaccine passport in the Commission's pre-exposed roadmap, is now known as the Digital Green Certificate. In April 2021, the European Parliament published a summary of the situation. It reiterated the positions of the stakeholders. The aviation associations - category II entities, but also Airports Council International - European Region, category VI - came out in favour of the DGC, as did the World Travel & Tourism Council (63) (WTTC) (not listed in the Transparency Register, but some of its members are) and the European Travel Commission (64) (ETC) (category II entity).

According to the European Parliament's note, only Liberties, an NGO that 'promotes civil liberties in the European Union', was critical of the health card's compliance with the European Charter of Fundamental Rights. According to the memo, the NGO suggests that "Member States should, for example, be prohibited from applying differentiated restrictions on the free movement of vaccinated persons, patients who have recovered from the virus and others (until science proves that vaccination

Influence of NGOs on the European legislative process

does not endanger public health)". The wording thus emphasises that the NGO is not opposed to the health passport, only to its current form. A reading of the position papers of Liberties (whose full name, notably in the Transparency Register, is Civil Liberties Union for Europe) shows that the NGO has in fact gradually given its support to the health card, through four publications.

On 20 January 2021, Liberties called for equal access to vaccination. The NGO recommends avoiding the health pass for access to bars, cinemas or concerts to avoid a two-tier society. Liberties criticises the fact that a two-tier society would result from inequality in the distribution of vaccines: 'The immunisation passport could thus become a "passport to privilege", exacerbating the division between those who already enjoy a comfortable position in society and those on the margins. The article sets out three sets of recommendations for the European Union:

- Secure the number of doses so that everyone can have access to them; publish guidance for governments to show them how to make vaccines as accessible as possible; invest in awareness and education campaigns to inform and encourage the public to be vaccinated.
- The European Commission could take legal action against countries that apply discriminatory vaccination policies.
- The Commission could also take legal action if governments require vaccination as a condition of travel within member countries. Liberties considers that a negative test is sufficient to provide the same guarantees while being less intrusive.

This Liberties article was written by Israel Butler. According to his LinkedIn profile, prior to Liberties and two years of independent consultancy, Butler was a senior policy officer at OSEPI (Open Society European Policy Institute) from March 2012 to February 2015. The second article, dated 22 January 2021, is entitled 'Three reasons why a vaccine passport for EU travel is a bad idea'. The article is co-authored by Israel Butler and Linda Ravo. While the latter, a member of Liberties, is discreet about her CV, the Academia website provides more information about her links to European institutions: legal researcher at the European Fundamental Rights Agency (2012-2013), at the European Commission (2013) and at the European office of Amnesty International (2013-2014). Academia also states that 'Linda joined the European Commission's Directorate General for Justice in March 2014, where she works as a legal assistant in the field of fundamental rights and EU citizenship'. The recommendations in this article remain broadly the same as in the first. However, the authors add that the EU should invest more in the level and duration of immunity and the reduction of transmission rates induced by the vaccine. The third article was published on 15 March 2021, ahead of the Commission's legislative proposal of 17 March 2021 for a Digital Green Pass. Liberties pointed out that the planned certificate would provide 'proof that a person has been vaccinated against COVID-19 and/or recent test results for those who have not been vaccinated and/or information on recovery from COVID-19'. Far from objecting, Liberties refers to von der Leyen's statement on Twitter that this pass 'will respect data protection, security and confidentiality'. Here Liberties returns to the risk of a two-tier society. In it, Butler wrote that 'governments and the European Union should instead focus on convincing as many people as possible to be vaccinated and speeding up a fair roll-out [of vaccination]'. Liberties, however, continued to defend the alternative of PCR testing.

However, the passport is of particular interest to the NGO: 'While vaccination certificates are the responsibility of the Member States, the European Union has a clear interest in developing a coordinated approach. In the eyes of the public and several European governments, the Digital Green Pass offers an excellent way of returning to 'normality' and reinvigorating economies devastated by COVID-19 restrictions.

⁶³. WTTC President and CEO Gloria Guevara, who signed the letter, was a member of the WEF's Future of Travel, Tourism and Aviation Global Agenda Council.

⁶⁴. Partner of the European Commission in the Destination 2020 initiative.

While we welcome the call to introduce digital certificates of immunity/test result/vaccination against COVID-19, we call on the European Commission and Member States to be mindful of the risks and dangers that such digital passes may entail’. Liberties therefore published its recommendations on 12 March 2021: ‘Digital Green Pass: What should the European Commission and Member States do to make the green passport secure and inclusive (65)’. The document outlined 6 key recommendations:

1. Do not invest public funds in dangerous digital solutions to address problems whose nature remains unknown. Invest first and foremost in discovering how to put an end to the transmission of COVID-19.
2. The Commission should supervise the actions of the Member States to make vaccination accessible to all without discrimination.
3. For those who have already been vaccinated, this would make it easier to cross borders, while simple ways of obtaining tests should be available for non-vaccinated people.
4. If Member States decide to link privileges to vaccination status, they should also provide rapid testing facilities to ensure that those who cannot or do not want to be vaccinated are not excluded from social life. This recommendation is set out in Article 6 of the Commission's proposal for a regulation, ‘Test Certificate’.
5. Any proposal for a Digital Green Pass should require Member States to provide the equivalent physical medium for those who do not have a smartphone, or similar alternatives to using the Digital Green Pass. On 17 March 2021, the European Commission incorporated this recommendation into its proposal for a regulation (Article 3 ‘Digital Green Certificate’, point 2).
6. Any proposal for a Digital Green Pass must comply with the European Union's data protection policy (the Commission has included this recommendation in its Article 9, "Protection of personal data"). This proposal should also require Member States to carry out an impact assessment before introducing a Digital Green Pass at national level. This should be done in consultation with civil society organisations (NGOs).

On 24 March 2021, in response to the Commission's proposal, Liberties published a note highlighting six problems and making six recommendations to European legislators. Drawn up on 22 March 2021 by Orsolya Reich, the note repeated some of the previous recommendations.

On 14 April 2021, the Council of the European Union adopted the Commission's proposal, with a number of amendments:

- Article 3 on the Digital Green Certificate was amended to take account of Liberties' concerns and recommendations. The Council stipulated that ‘The certificate shall include the following text: ‘This certificate is not a travel document. The scientific evidence on vaccination, testing and cure of COVID-19 continues to evolve, particularly in the light of new variants of the virus. [...]’ Possession of a GCD should not be a prerequisite for the exercise of free travel rights’. This addition echoes the NGO's first recommendation of 20 January 2021, according to which a simple test should suffice to cross borders. Another comment in the same article has been taken into account, relating to the principle of non-discrimination, particularly in access to healthcare for ‘undocumented migrants’.
- Article 2(1) of the Council proposal states that the holder of the DGC is not, as proposed by the Commission, ‘a citizen of the Union or the members of their family’, but simply ‘a person’.

65. The document was written by Israel Butler, Linda Ravo and a third Liberties member, Orsolya Reich. The latter holds a master's degree in political science and a doctorate in philosophy from the Central European University, i.e. Soros University.

- Article 9, which deals with the protection of personal data, adds that verification should be carried out ‘only’ in the cases provided for in the regulation.
- Articles 5 (‘Vaccination certificate’) and 6 (‘Test certificate’) have also been amended. The personal nature of the data included in the certificate has been removed: ‘personal data’ has been replaced by ‘data’. This change responds somewhat to Liberties' recurring concerns (see for example the 6th recommendation of its note of 22 March 2021) about the protection of personal data in compliance with the RGPD.
- Article 15 has been amended by the Council. In its proposal, the Commission had suggested that a review of the application of this regulation should be presented one year after the declaration by the Director-General of the WHO of the end of the COVID-19 epidemic. The Council, for its part, stipulates that this regulation will apply for a period of 12 months from its entry into force. Three months before the end of its application, the Commission will have to present a progress report, including an impact study on the free movement of persons, the acceptance of vaccines and the protection of personal data during the epidemic. The report will have to include legislative proposals on extending the regulation in the light of developments in the situation. Although this Council provision does not fully meet Liberties' demands for clarification of the conditions under which the certificate will be definitively withdrawn, it is a step forward for the NGO.

About Liberties

As previously mentioned, it is evident that Liberties, otherwise known as the Civil Liberties Union for Europe, comprises members of the Soros network. This observation is also applicable to the organisation's core team. The compilation of a table detailing the CVs of its diverse members unveils the following profiles, the majority of which pertain to their direct affiliations with the Soros networks:

Name	Position	CV
Nikolett Aszodi	Advocacy & Research Assistant	
Michaela Brzezinka	Head of Operations	
Csilla Budai-Sawalha	Head of development	Open Society, CEU ⁽⁶⁶⁾
Israel Butler	Head of advocacy	OSEPI
Jonathan Day	Head of video advocacy	CEU
Balázs Dénes	Executive Director	OSIFE (division manager)
Jonathan Jascha Galaski	Head of advocacy	
Sebastien Pant ⁽⁶⁷⁾	Senior Communications and Press Relations Manager	Spokesperson's Service of the European Commission, EEB, BEUC
Linda Ravo	Advocacy consultant	European Commission, Amnesty International
Orsolya Reich	Advocacy officer	CEU ⁽⁶⁸⁾
Eva Simon	Advocacy officer	CEU, Hungarian Civil Liberties Union ⁽⁶⁹⁾
Valentin Toth	Communication officer	Transparency International ⁽⁷⁰⁾

66. As well as Amnesty International and Relief International.

67. Pant also has its own communications consultancy website.

68. Specified on the NGO's English page, but not on its French page.

69. Specified on the NGO's French page, but not on its English page.

70. His LinkedIn profile details his experience as a volunteer communications advisor for the NGO, from August 2009 to March 2014.

The background of the members of the Bureau is part of the same nebula:

Name	Position	CV
Georgiana Gheorghe	Vice-president	CEU
Krassimir Kanev	Treasurer	CEU, Bulgarian Helsinki Committee, PILnet, Association for the Prevention of Torture, International Partnership for Human Right ⁽⁷¹⁾
Sara Lalic	Member	Centar Za Mirovne Studije
Nancy MacPherson	Independent member	Rockefeller Foundation, IUCN
Andrea Menapace	President ⁽⁷²⁾	Transparency & Accountability Initiative, Open Government Partnership
Máté Szabó	Member	Hungarian Civil Liberties Union

71. Kanev is also a member of the Board of Directors of the European Union Agency for Fundamental Rights, and represents clients before the Soros-influenced European Court of Human Rights (see the Puppink report).

72. Vice-president according to the French page.

73. Reminder: the article is dated 20 January 2021.

74. BlackRock is registered as a Category II entity (company) in the European Commission's Transparency Register. It is also a central player at the heart of the Great Reset mechanism, mainly through 'helicopter money', as explained in issue 489 of Facts & Documents: '[...] the Davos Forum acknowledges [...] that Covid-19 has enabled the application of modern monetary theory [...] (helicopter money) promoted by BlackRock to central banks at the Jackson Hole symposium in August 2019 in order to abolish the boundary between monetary policy and fiscal policy. Central banks would maintain a 'permanent standing facilities' that would be activated when interest rate manipulation no longer worked to prevent deflation. These 'standing facilities' would be deployed by an 'independent expert' appointed by the central banks. And in March 2020, BlackRock obtained this mandate from the Federal Reserve (FED), a no-bid contract under the Coronavirus Relief and Economic Security Act (known as the CARES Act) to deploy a \$454 billion slush fund created by the Treasury in partnership with the FED. [...] BlackRock's assets are managed by artificial intelligence via its Aladdin software, which has been given the task of distributing Federal Reserve funds through the eleven 'special purpose vehicles' set up under the CARES Act. These vehicles were designed to enable the Fed to finance the purchase of riskier assets on the market, essentially ETFs. As Ryan Clements (Duke University) explains: 'ETFs are at the heart of the COVID-19 financial crisis'. In addition to rescuing the ETF industry from the brink of collapse, BlackRock has essentially taken the reins from the FED and risen to the top of the Great Reset system'.

75. Against 43 on 5 May 2021

we read that Davos is working to develop a 'common trust framework' through the Common Trust Network (CTN), an initiative launched jointly with The Commons Project Foundation. The Commons Project Foundation's website states that the initiative was created by the influential Rockefeller Foundation.

The Commons Project was established with support from the Rockefeller Foundation.

The Commons Project's general assembly includes a wide range of members from various entities, including the Global Head of Performance at BlackRock (74), a former partner at Goldman Sachs, and the Executive Chairman of J. P. Morgan. The Commons Project has developed several initiatives. The Common Trust Network (CTN) initiative is presented as a partnership of public and private stakeholders with the aim of ensuring that only verifiable laboratory results and vaccine records from trusted sources are presented for cross-border travel and trade. A review of the project website highlights the lead – or anticipation – taken by the Common Trust Network (and therefore the WEF) over the European Union. Regarding partners in the health sector, the CTN has announced that it has 'suppliers of tests, vaccines and public health registers' at global level. As of 15 June 2021, this represents 48 organisations (75). The CTN also has 24 technology partners (including IBM, Mastercard, Salesforce and the influential Oracle), six application suppliers (including its own, CommonPass), and around fifteen partners from the tourism industry (including Allianz Partners, Airports Council International, the International Transport Workers' Federation and the World Travel & Tourism Council). No government has yet registered as a participant in the CommonPass.

The influence of the World Economic Forum

We have already highlighted the WEF's influence by reviewing its meetings with European officials, in particular through Integrity Watch. The 'NGO' has also been vocal and involved in the development of a vaccine passport. On 20 January 2021, the WEF published an article with the rhetorical title: "What is a 'vaccine passport' and will you need one next time you travel? The introduction states that the article is part of the Davos Agenda 2021, which defines itself as "a landmark initiative by world leaders to influence principles, policies and partnerships in this challenging new environment. It is essential that from 2021, leaders from all corners of the world work together virtually for a more inclusive, supportive and sustainable future. The article goes on to state that the concept of a community pass had already been under discussion for several months within the organisation, as reported by the director of the WEF's 'Influencing Health and Healthcare in the Future' programme (73).

The European Parliament has made it clear that the health passport, known as the 'Covid European digital certificate', is not a 'vaccination passport'. The project does, however, appear to be fully in line with the roadmap the Parliament has been preparing for several years, and more in line with the vision and approaches of the World Economic Forum. The WEF uses the term 'vaccination pass' for a document (paper or electronic) that would provide information on vaccination status against COVID-19 or a recent negative test. Furthermore, as Éric Verhaghe reminded us, Schwab & Malleret advocate tracing, i.e. the ability to reconstruct people's itineraries, the people they have met and the places they have visited.

In April 2021, an IPSOS survey commissioned by the WEF focused on this very topic: 'World opinion on personal health data and vaccine passports'. The results are intriguing given the potential implications for the implementation of Klaus Schwab and Thierry Malleret's Great Reset. The survey revealed that, on average, three out of four people in the 28 countries surveyed expressed approval for the concept of a health pass for individuals entering their country. Considering the prevailing alarmist rhetoric surrounding the subject since the onset of the pandemic, it is crucial to contextualize these results.

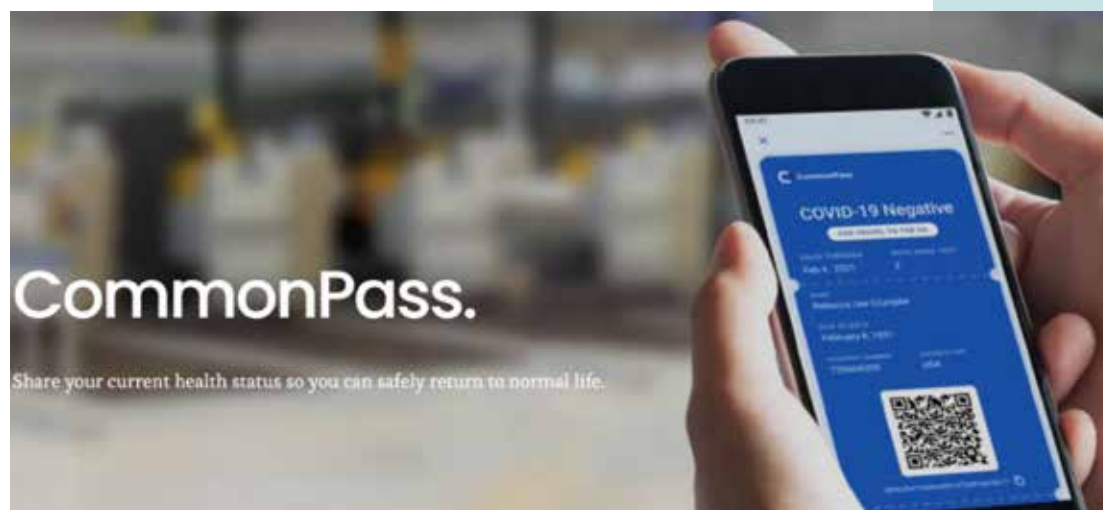
Additionally, the selection of countries involved in the survey raises questions, as these 28 countries are not part of the European Union but rather selected nations worldwide.

However, it is not this survey, but an initiative by the World Economic Forum, that highlights the organisation's influence on the health direction taken by the European Commission through its digital certificate. In the above-mentioned WEF article of 20 January 2021,

A growing global network of testing providers, vaccination providers, and public health registries.



The aforementioned CommonPass is, quite simply, a turnkey version of the Digital Green Certificate adopted by the European Parliament on 9 June 2021. In other words, it represents a major economic opportunity for the World Economic Forum and its partners, using the health crisis as a pretext. The CommonPass offers people the chance to share their health status 'so that they can safely return to normal life'. The accompanying photo shows that it concerns COVID-19 (76):



76. A video presentation, made on 31 March and posted on The Commons Project YouTube channel, is also available from the website - but marked as off-list.

What is the Great Reset?⁽⁷⁷⁾

The Great Reset was announced by Klaus Schwab on 03 June 2020, when the founder of the World Economic Forum presented COVID-19 as 'a **rare but narrow window of opportunity to rethink, reinvent and reset our world**'. The phrase was taken from a book written and published at the time by Klaus Schwab and Thierry Malleret, *COVID-19: The Great Reset*. A forward-looking exercise or a roadmap, depending on your point of view, the book aims to use the COVID-19 pandemic as the basis for a complete overhaul of the way our societies function.

'Many of us are wondering when things will return back to normal. The short answer is never. [...] There will be a 'before coronavirus' era and an 'after coronavirus' era.'

Klaus Schwab & Thierry Malleret, *COVID-19: The Great Reset*

'[Most people] will then be willing to give up much of their privacy and will agree that in such circumstances public power can legitimately override individual rights.'

Ibid

'The Great Reset is based on a simple idea: the coronavirus pandemic is having such an impact on the world as a whole (and not just on its economy) that it offers the most unexpected opportunity to speed up reforms or changes that have been underway for many years. These fundamental changes affect all areas of human life: the economy, of course, but also the role of the State, personal well-being, relationships between people, the technologies available to them, ecology and geopolitics'.

Éric Verhaeghe, *Le Great Reset: mythes et réalités* – suivi du dictionnaire critique du Great Reset.

'On the health pass, it is clear that the European Commission is the main agent of the Great Reset in Europe'. 'The health pass is 100% compatible with the Great Reset.'

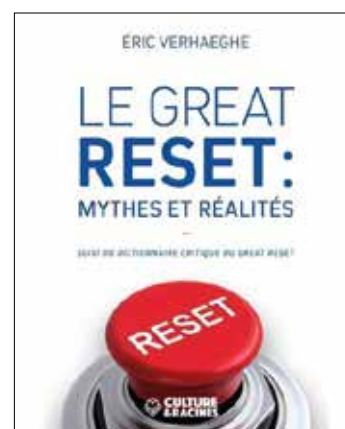
Éric Verhaeghe, video interview with Epoch Times France, 15 June 2021.

'At the time of the Great Reset, which is being prepared under the guise of a serious anti-liberal management of the health crisis we are going through, we can ask ourselves whether the synthesis of capitalism and communism has arrived, with the aim of creating a neo-totalitarianism inspired by the Chinese system of market socialism [...] This Great Reset is a collectivist project'.

Bruno Riondel, From October 1917 to the Great Reset of 2021. Online conference, 09 February 2021.

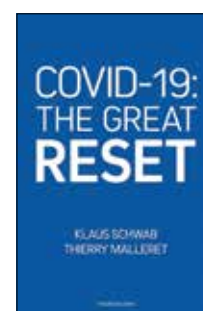
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Bruno Riondel, From October 1917 to the Great Reset of 2021. Online conference, 09 February 2021.



77. To form an opinion on the basis of selected extracts, we suggest that you read the three issues of *Faits & Documents* (487 to 489) devoted to the Great Reset. Particularly explicit passages from Schwab and Malleret's book are quoted. For a complete analysis, we also recommend Éric Verhaeghe's book *Le Great Reset: mythes et réalités*.

- followed by a critical dictionary of the Great Reset. More pessimistic as to what will happen next, Modeste Schwartz, *Le magicien de Davos, Vérité(s) et mensonge(s) de la Grande Réinitialisation*, provides a critical response to some of the points made in Éric Verhaeghe's book. We also recommend the book by Klaus Schwab and Thierry Malleret, *COVID-19: The Great Reset*, available online.



COVID-19 is being used as a means of achieving a number of objectives:

• **The implementation of a strategic global governance framework** and regional socialism as a third way (i.e. as the only possible way) is proposed as an alternative to globalisation and deglobalisation. The European Union 'as a free trade area' is cited as an example to follow. The authors express concern over the potential rise in patriotic feelings that may be generated by the pandemic.

• **Ongoing health surveillance** will be facilitated by the deployment of technology ranging from smartphones to facial recognition cameras, which will detect and locate sources of infection and, by extension, contact cases. The 'mental health problems' caused by political measures taken under the pretext of the pandemic (the wording is ours) will lead to a strengthening of psychiatry's capacity for action (i.e. internment (78)).

• **The managed destruction of small and medium-sized companies, as well as entire industries**, is set to be accompanied by a significant increase in state interference in corporate affairs, a phenomenon that critics of the Great Reset have dubbed "Bolshevism 2.0". The global recession triggered by the pandemic is also projected to transform the world of work, with an increasing presence of automation in the workforce, signifying a shift towards greater reliance on artificial intelligence over human labour. However, the most concerning predictions are yet to be realised: "There will be an increase in taxation, and as in the past, the social logic and political justification behind the increases will be based on the narrative of 'countries at war' (but this time against an invisible enemy). [...] Drug manufacturers will be richer and more powerful than ever. [...] The combination of artificial intelligence (AI), the Internet of Things (IoT) as well as sensors and wearable technology will produce new insights into personal wellbeing. These technologies will monitor individuals' health and well-being, gradually blurring the distinction between public health systems and personalised health creation systems.

• **The militancy of the younger generation is being harnessed** to implement the societal changes promoted by the Great Reset, in particular by pushing companies to align with societal imperatives. No. 488 of Faits & Documents provides further details: 'For companies, the appropriate "behaviour" is in fact compliance with the Environmental, Social and Governance Criteria (ESG), i.e. strict observance of the imperatives dictated by the headlong rush to political correctness (feminism, diversity, "sustainability", etc.). The reference document cited in this regard is Sustainable investing: Resilience amid uncertainty, a note produced last spring by BlackRock, which provides an answer to the question: 'Who sets the criteria? Also, to 'help' companies adapt to ESG (also known as 'stakeholder capitalism'), the World Economic Forum has also published a roadmap produced in collaboration with Bank of America, Deloitte, EY, KPMG and PwC'.

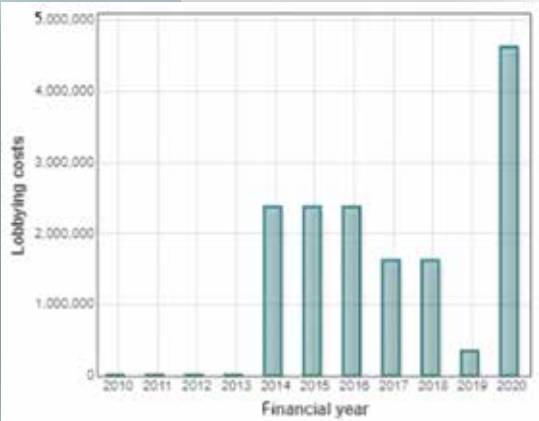
• **An anthropological upheaval** resulting in particular from the disruptions to supply chains following COVID-19, which Schwab & Malleret believe will lead to new mass migrations similar to those experienced in Europe. A new social contract would be implemented, in the form of a potentially comprehensive offer of 'social assistance, social insurance, healthcare and quality basic services' (i.e. universal income, combined with facial recognition on the model of Chinese social credit). Digital technology, which is set to develop intensively, will change habits and mean that 'social and physical distance will persist', including for family gatherings.

78. This is an old pet idea, which is gradually becoming a reality. The wish for an influential psychiatry with freedom of movement was already expressed in 1940 by Colonel John Rawling Rees, in the journal Mental Health, October 1940, 1 (4), pp.103-106). Rawling Rees, the first president of the World Federation for Mental Health (WFMH), was also close to Brock Chisholm, the first Director-General of the WHO (and fifth President of the WFMH).

79. Footnote 116 of COVID-19: The Great Reset refers directly to the European Commission's European Green Deal strategy document and its priorities for 2019-2024.

• **Global governance**, justified by a link that Schwab & Malleret weave between COVID-19 and the climate, also pushing ever further towards the UN's 17 Sustainable Development Goals (SDGs). The European Commission's Green Deal is cited as a reference for the application of this aspect of the Great Reset, with its €1,000 billion to mitigate CO2 emissions and invest in the circular economy, with a target of continental carbon neutrality by 2050. (79)

Open Society European Policy Institute



George Soros' Open Society, founded in 1979, is the "philanthropic" arm of the billionaire's activities. The NGO, of which George Soros is CEO and one of his sons, Alexander Soros, is vice-CEO, has five central offices: Washington D.C., New York, London, Berlin and Brussels (OSEPI). It also has a presence in some forty countries around the world. Its Ukrainian branch, the International Renaissance Foundation, has offices in five Ukrainian cities.

A picture is sometimes worth a thousand words, and the Washington location of the Open Society (which also includes the Open Society Policy Center) and

its geographical proximity to the White House, compared via Google Maps, show that despite having one foot on the European continent, the NGO's real organising centre is in the United States:



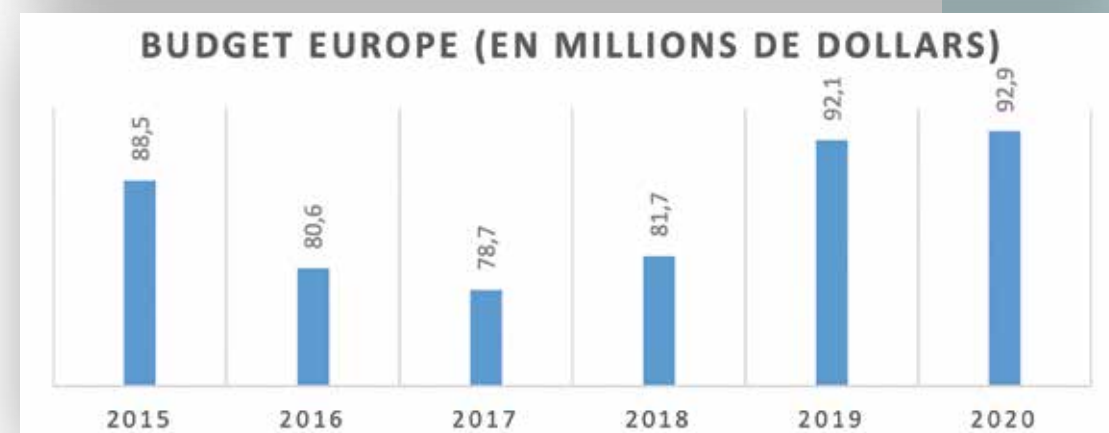
Only one branch of the Open Society, George Soros' NGO, is listed in the European Commission's Transparency Register: the Open Society European Policy Institute (OSEPI). Registered since 21/08/2008, this Brussels-based branch had a budget of €8.53 million for its last financial year. As with Gates and other NGOs, the Lobby Facts website has analysed OSEPI's lobbying expenditure over several years.

N. B. : This figure refers to OSEPI alone. We will add the other national branches of the Open Society that appear on this register:

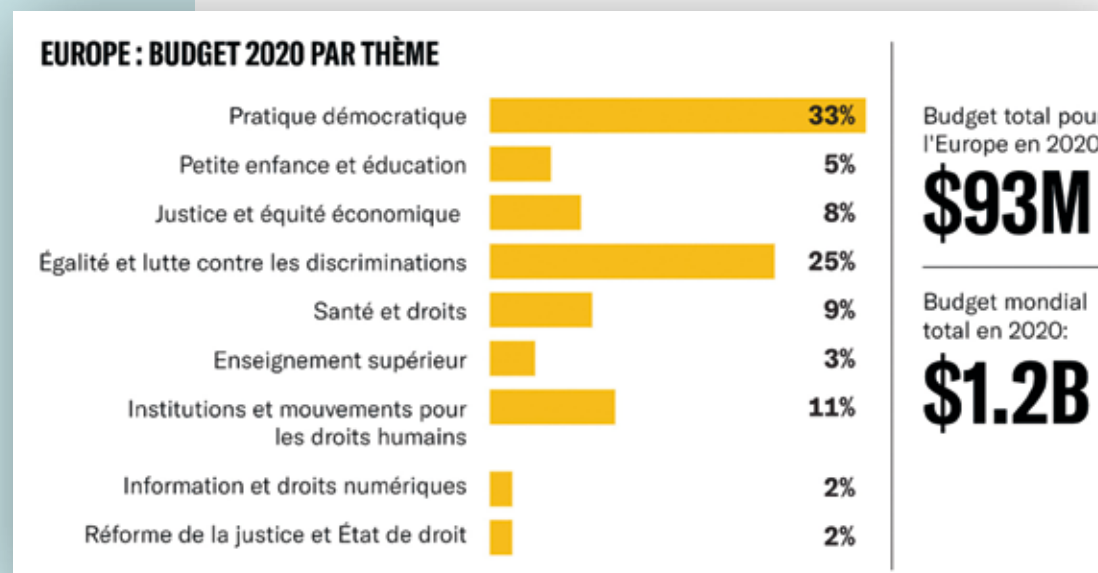
- **Fundacja im. Stefana Batorego (Poland)**, registered on 17 August 2010. With a budget of €3.29 million for 2019.
- **Soros Foundation-Moldova (Moldova)**, registered on 30 September 2016. With a budget of €4.33 million for 2019.
- **Alliegie SolidarityNow (Greece)*** registered on 10 August 2016. With a budget of €13.55 million for 2019.

** Focusing on the 'migration crisis', this NGO has received a €13.27 million grant from the European Commission's Directorate-General for Civil Protection and Humanitarian Aid (ECHO).*

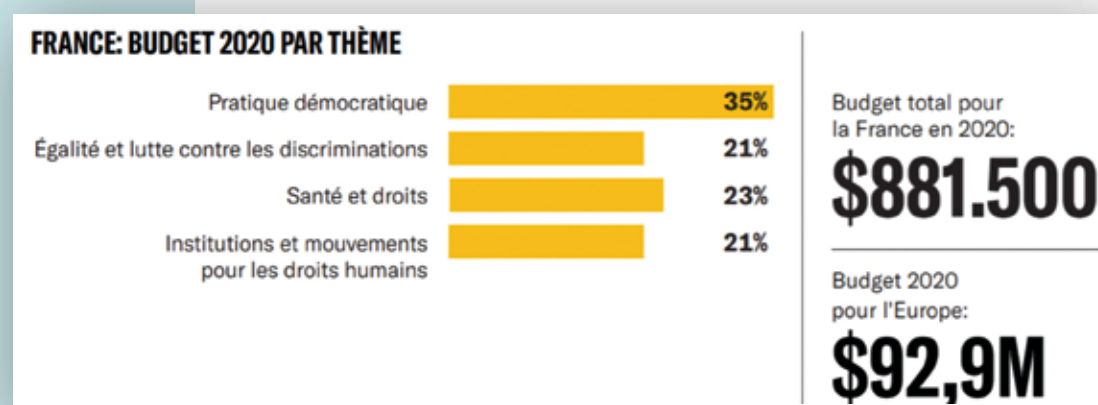
In addition, to assist the reader in gauging the scope of the work undertaken by the Open Society Foundations, we have outlined below the changes in its overall budget, followed by its budget dedicated to Europe, based on the figures provided by the NGO.



In Europe, for 2020, the Open Society Foundations (not OSEPI) has allocated its budget as follows:



Finally, in a brief document dated 25 March 2021, the Open Society sets out its French budget expenditure for 2020:



In addition to its national organisations based in Europe, the Open Society Foundations distinguishes between two European branches dedicated to the continent:

- The Open Society European Policy Institute (OSEPI), based in Brussels, which pursues its advocacy activities ‘with the institutions of the European Union’.
- The Open Society Initiative for Europe (OSIFE) has been overseeing the awarding of grants to NGOs across the continent since 2013, with a particular focus on encouraging European citizens to become politically involved on a daily basis. This includes making politicians accountable and promoting transparency, an issue we will return to later. However, the most interesting point is made in the following paragraph: ‘Many major European human rights groups benefit from our grants [...]’. It will become evident that the organisations that obtain the most meetings with members of the Commission, and this over several portfolios, are direct beneficiaries of Open Society Foundations grants, an approach that is not reflected in the European Commission’s Transparency Register.

Furthermore, in a Q&A interview with the Open Society Foundations on 8 November 2017, OSIFE director Jordi Vaquer explicitly clarified the branch’s method of influence: ‘Our beneficiaries are linked to policy conferences, think tanks, newspapers, and other vectors and spheres of political influence.’

OSEPI has 16 full-time equivalent staff and is defined as the advocacy and policy arm of the Open Society with the European Union. The objectives and missions of OSEPI are as follows: ‘to influence and inform decision-making on European external action, funding, policies and laws to maintain and promote open societies in Europe and beyond. The Brussels team provides input, arguments and recommendations to policymakers in the European institutions and Member States, drawing on the work of the Open Society in nearly 100 countries.»

In accordance with the Commission register form, OSEPI asserts that its office maintains ongoing communication with key European policymakers at various levels, including the European External Action Service (EEAS), the European Commission, the Council of Europe, the Council of the European Union, the Permanent Representations of the European Member States, Members of the European Parliament, and other European institutional actors. Since 1 December 2014, the NGO has engaged in 79 meetings with European Commissioners, members of their cabinets or the Directorate-General, broken down as follows:

- 43 meetings with Commissioners (including 13 with Frans Timmermans),
- 31 meetings with cabinet members,
- 4 meetings with the Directorate-General.

A review of some of these meetings, listed in the portfolio under the heading ‘President’, highlights the influence of OSEPI:

- 20 March 2015: Meeting between Commission President Jean-Claude Juncker and George Soros.
- 27 April 2017: Meeting with Jean-Claude Juncker including two members of his cabinet on European affairs and European civil society.



An online article in New Europe reports that Juncker and Soros met again on this occasion, as confirmed by a Euronews video. The article also goes into more detail about the topics discussed at the meeting: the Central European University (then banned by Viktor Orban and now relocated to Germany), Ukraine and Brexit.

- 23 July 2020: Meeting with a member of the cabinet of the President of the Commission, Ursula von der Leyen, on the subject of upholding the rule of law.
- 30 July 2020: WebEx meeting with 11 members of von der Leyen’s cabinet for a brainstorming session on ‘The state of the European Union in 2020: society and democracy’.

OSEPI and European Commission meetings

OSEPI is ranked 8th among NGOs in terms of the number of meetings held with members of the European Commission under the Juncker mandate. This puts it behind major NGO federations and prominent environmental organizations. Notably, among the 3,940 meetings held during this period, OSEPI holds the record for the most meetings with the Commission, where it presented its approach to various European portfolios.



‘Better regulation’: OSEPI’s area of expertise

OSEPI’s portfolio on Integrity Watch for the period 2014-2019 (Juncker Commission) shows that the NGO focuses mainly on Better Regulation. This issue was the focus of 25 meetings with the NGO (including 12 with Frans Timmermans), averaging five per year. Justice, the NGO’s second most popular topic, received less attention, with only seven meetings. Integrity Watch also reports that OSEPI is the leading organization in terms of the number of meetings held on the issue of regulation (see opposite).

- Amnesty International European Association (AI EIO) took **2nd place** with 15 meetings. This ranking is noteworthy for those interested in the scope of the Open Society’s lobbying at the European level. As noted in an article published on 28 July 2015 on the Open Society website, Amnesty International is a recipient of grants from George Soros’s NGO.

Amnesty International is a grantee of the Open Society Foundations.

The grants database on the Open Society website confirms this, although it only provides access to this information by allowing us to go back as far as 2016. In any case, the 28 searchable donations concerning Amnesty International represent a total of almost US\$9.7 million in grants. For earlier donations, Amnesty International’s reports indicate that the NGO received £140,000 from the Open Society Foundations in 2014 and £309,000 in 2015. The most substantial grant (US\$4 million in 2017) aims to support Amnesty International in reaching a total of 25 million active supporters for human rights by 2020, and a total of 2.25 million international members and supporters. Amnesty International’s European office website contains a substantial number of documents detailing Open Society’s activities and initiatives, with a particular focus on collaborative efforts.

A cross-referenced search on LinkedIn underscores the interconnectedness between the two NGOs, as evidenced by the subsequent joining of former Amnesty International members to Open Society. This phenomenon is also evident in the relationship between Open Society and Human Rights Watch, which **ranks 3rd among the top 10 NGOs**.

- Human Rights Watch is even more closely linked to George Soros. It was co-founded by Aryeh Neier, who was also director of the Open Society from 1993 to 2012. Soros provided a grant of US\$100 million to the NGO over a period of ten years.

- **In 4th position**, the International Rescue Committee (IRC), an international humanitarian aid NGO - particularly active in the migrant ‘crisis’ - has also benefited from generous donations from the Open Society, i.e. more than US\$2.1 million between 2016 and 2019 (including US\$1.3 million via two donations in 2019 alone). Since 1996, the Gates Foundation has awarded 44 grants to the IRC, totaling several tens of millions of dollars. The influence of this NGO on the European Commission is illustrated by several factors. Firstly, the IRC is the second NGO (after ActionAid) to have received the most grants from the Commission, according to the global database drawn from the Commission’s Transparency Register (80). Over a span of one year, the IRC received nearly €64.8 million in grants under the ECHO and Europe Aid programmes. This substantial support from the European Commission was further acknowledged on 21 December 2020 with the award of a European Humanitarian Partnership 2021-2027 certificate to the IRC (IRC Deutschland). The IRC’s webpage dedicated to its donors states that it is “proud to work in collaboration with these national governments and international institutions.”

80. Reminder: We do not specify a fiscal year as this varies from one NGO to another. For the IRC, the fiscal year covered in the Register as of 03 June 2021 runs from October 2018 to September 2019.



These elements provide a comprehensive insight into the impact of the feedback provided by the IRC during public consultations initiated by the Commission, as evidenced by the 'EU humanitarian action - strategic priorities' consultation (feedback of 21 December 2020), adopted by the Commission on 10 March 2021. A comparative reading of the IRC’s recommendations and the Commission’s communication reveals that the former are integrated into the latter on several points.

- Greater resources allocated to local stakeholders following COVID-19.
- ‘Extend the availability of multi-year flexible funding mechanisms with humanitarian partners - liaising with development instruments wherever an approach linking humanitarian aid, development and peace can be foreseen [...]’, p.9; this is an almost verbatim reiteration of the IRC (‘Increasing the availability of multi-year flexible funding [...]’, p.2).
- Intensify EU support for local stakeholders as part of the ‘Great Bargain’.
- Promote joint messaging by the EU and its Member States on major humanitarian crises, as well as combined EU and Member State pledges at international donor conferences (alongside national pledges).
- Encourage private sector participation in humanitarian funding, and highlight the benefits of combined contributions.
- ‘Develop specific guidance on the increased use of digital cash and ensure access to digital solutions for aid recipients as part of the revised EU thematic policy on cash transfers’, p.9; IRC called for digitisation of financial services, p.2.
- Tackle barriers (particularly administrative ones) to humanitarian aid.
- ‘Strive to unify EU and Member State positions in relevant international and multilateral settings’, p.27; the IRC mentioned the G20 by name, p.3.

The 9th position is held by the Platform of European Social NGOs, known as the Social Platform, whose members are funded by Open Society and include ILGA Europe, PICUM and Transgender Europe.

Synthesis:

Amnesty International EU	Human Rights Watch	International Rescue Committee
WWF EU	Friends of the Earth Europe	European Environmental Bureau
CONCORD Europe	Social Platform	Green 10

Justice

The **Open Society** ranks second. The European Consumers' Organisation (BEUC) is a leading NGO, and it participates in many of the European Commission's expert groups. BEUC has a staff of 33 (24.8 full-time equivalents) and an overall budget of €5.9 million for the last financial year (January 2020 - December 2020). Half of this budget comes from public funds, including almost €2 million from the European Commission. BEUC also brings together more than 40 organisations and was the NGO that held the most meetings (144) with members of the European Commission during the Juncker presidency. BEUC is also a member of 38 Commission expert panels.

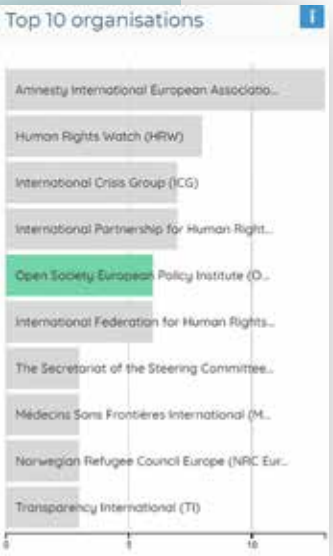


- In joint 3rd place, **the European Women's Lobby** only received a US\$25,000 grant from the Open Society in 2016. However, Soros's NGO also announced in 2014 that the Secretary General of the EWL (currently still in office) would receive financial support for her first two years at the helm of the NGO. In 2016, the EWL received 76% of its funding from the European Commission.
- Still in 3rd place are **the ERGO Network** (see below) and **Amnesty International**.
- Tied for 8th position, **Equinet** received a grant of more than US\$56,000 from the Open Society in 2019. Next to it, **the Center for Democracy & Technology** is an American organisation to which the Open Society gave more than US\$100,000 in 2020 (81) - the total sum is unknown as the Open Society database does not mention any grants to this NGO.
- Also in 8th position, **the European Network Against Racism (ENAR)** received almost US\$780,000 in grants from the Open Society between 2016 and 2018. Interestingly, after this boost from the Open Society, ENAR did not meet any more members of the Commission - its four meetings listed on Integrity Watch were held between January and September 2015. Of the OSF's donations to ENAR, the two largest (US \$300,000 in 2017 and US\$410,000 in 2018 respectively) were aimed at developing ENAR.

Synthesis:

European Consumer Organisation	European Women's Lobby	Stichting ERGO Network
Amnesty International EU	Transatlantic Institute	European Law Institute
Equinet	Center for Democracy & Technology	European Network Against Racism

81. For a similar broad range of donations, we find in particular: Amazon, Charles Koch Institute, Democracy Fund (a project of the New Venture Fund, funded by Open Society to the tune of US\$2.87 million between 2016 and 2019), Microsoft, WhatsApp (i.e. Facebook). Other donors have been more generous, with donations in excess of US\$500,000: Ford Foundation, Knight Foundation, Google, and the Chan Zuckerberg Initiative (i.e. the boss of Facebook) 'a designated fund of the Silicon Valley Community Foundation'.



82. We wrote about EEA Grants in Soros l'Impérial, pp.182-186.

Action outside the European Union

This area is also dominated by the Open Society galaxy. OSEPI is 'only' 5th among the NGOs that have met the most members of the European Commission on this subject, with six meetings. The other NGOs in this field are as follows:

- 1st position: **Amnesty International European Association** (13 meetings),
 - 2nd position: **Human Rights Watch**,
 - Joint 3rd position: **International Crisis Group**. George Soros and his son Alexander are both board members alongside other prominent figures. Some of these are worth mentioning to underline the influence that the Open Society exerts over this organisation:
- > **Ellen Johnson Sirleaf**, former President of Liberia, was also the former director of the Open Society Initiative for West Africa (OSIWA), the West African branch of Soros' NGO. In 2007, Sirleaf presented George Soros with Liberia's highest honours.
 - > **Ivan Krastev**, member of the founding board of the European Council on Foreign Relations, an NGO established at the instigation of Soros.
 - > **Ghassan Salamé**, father of the French journalist of the same name. Ghassan Salamé sits on the Emeritus Board of Reporters Without Borders (RSF), which regularly receives generous funding from the Open Society.

- > **Jonas Gahr Støre**, former Norwegian Minister of Foreign Affairs. Støre was also the head of the NGO EEA Grants (82), which played a significant role in responding to the migrant crisis. EEA Grants is funded by Norway at 95%, with Iceland and Liechtenstein contributing 5%. In 2016, the Open Society was responsible for managing most of its national programmes dedicated to migration and asylum.
- > **Darian Swig**, founder of the NGO Article 3, a partner of Open Society, Human Rights Watch and other NGOs in the George Soros nebula.
- > **Mort (actually Morton) Abramowitz**, founder and director emeritus of the Crisis Group. In the past, Abramowitz has commented on Soros, stating that 'Soros is the only man with his own foreign policy and the means to carry it out'.
- > The Crisis Group is co-led by **Lord Mark Malloch-Brown**, former director of Smartmatic, a company accused of being linked to Dominion Voting Systems and fraud in the 2020 US presidential elections. Smartmatic had already been the subject of similar accusations in the past. Malloch-Brown's CV is substantial: former vice-chairman of Soros Fund Management and the Open Society - of which he became chairman in December 2020 -, member of the British House of Lords, former vice-chairman of Klaus Schwab's World Economic Forum (the architect of the Great Reset), former member of Gordon Brown's cabinet, director of the Royal Africa Society, trustee of the Shell Foundation, member of the Advisory Board of Acumen - an NGO founded by Andrea Soros Colombel, George Soros's daughter.
- > The second Crisis Group co-director is **Frank Giustra**. He is co-founder of the Global Refugee Sponsorship Initiative, a partner of the Open Society Foundations among others.

- Joint 3rd position: **International Partnership for Human Rights (IPHR)**. Between 2017 and 2019, the Open Society Foundations announced that it had awarded three grants to this NGO, totalling more than US\$1.4 million for general support. The IPHR also announces that it is a member of the Human Rights & Democracy Network, a collection of 57 'European' NGOs, half of which are closely linked to the American Open Society Foundations (which is itself present).

- 6th place: **International Federation for Human Rights (IFHR)**. Between 2016 and 2019, the Open Society awarded three grants to the organisation, totalling US\$1.75 million. In 2019, the Open Society was one of twelve NGOs thanked by the IFHR for their financial support. The IFHR website also reports on regular collaborations with the Open Society and Human Rights Watch. However, the IFHR's partnership with Open Society goes back further, as evidenced by Appendix 1 of the 2009 IFHR report, which already mentioned the presence and support of George Soros' NGO.
- Joint 7th place: **the steering committee of the Eastern Partnership Civil Society Forum** (EAP CSF). As we pointed out in our book, Soros l'Impérial (pp.202-203), the Open Society is active through the organisation of events and contributions. In 2011, the Open Society launched the Eastern Partnership Index, in collaboration with the International Renaissance Foundation (IRF), [i.e. a 'second'] Open Society in Ukraine. The Index's objective is to evaluate the progress of the six Eastern Partnership member countries (83) in achieving 'sustainable democratic development and European integration'.The project is funded by the two NGOs mentioned above and the Ministry of Foreign Affairs of the Czech Republic, with a grant of US\$55,000 awarded to the NGO in 2016, as reported by the Open Society database. The EAP CSF website reports several active participations by the Open Society Foundations. OSEPI and the Ukrainian, Armenian and Georgian Open Societies are members.
- Joint 7th place: **Transparency International**.

Synthesis:

Amnesty International EU	Human Rights Watch	International Crisis Group
International Partnership for Human Rights	International Federation for Human Rights	Eastern Partnership Civil Society Forum
Doctors Without Borders International	Norwegian Refugee Council	Transparency International

Budget

The 1st NGO is the Bill & Melinda Gates Foundation (5 meetings). OSEPI came 2nd with 4 meetings. ILGA-Europe tied for 3rd place. Tied for 6th place was ONE. Reminder: this organisation was co-founded by Bono, lead singer of U2 and a great admirer of George Soros - whom he describes as ‘a giant’. The NGO is influential enough for Bono to have met Josette Sheeran, Vice-President of Klaus Schwab's Davos Economic Forum, among others. In addition to ONE's funding from the Open Society and the Gates Foundation, the NGO's steering committee includes a certain Morton Halperin, a long-time friend of George Soros and a senior adviser to the Open Society, notably for advocacy on ‘open society’ issues. The Bertelsmann Stiftung (55) is another key player, with a history of collaboration with the Open Society and other organisations, as outlined on their website. Bertelsmann is also one of the organisations tasked with compiling the annual corruption perception index of Transparency International (which is heavily influenced by Soros), and it publishes a Sustainable Governance Index that has been adopted by the European Commission.

83. Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine.

84. The pdf file of the report states that the European Union contributed to its funding: <http://eap-csf.eu/wp-content/uploads/index-2015-6-web.pdf>

85. For more information, see the only book written about this Foundation: La Fondation Bertelsmann et la gouvernance mondiale, by Pierre Hillard.



Synthesis:

Bill & Melinda Gates Foundation	Stiftung Familienunternehmen	Fundatia Romanian Business Leaders
ILGA Europe	ONE	Konrad-Adenauer Stiftung
Eucor – The European Campus	Bertelsmann Stiftung	European Chamber of Commerce in Vietnam

European Neighbourhood Policy

OSEPI tied for 3rd place, with 3 meetings - including one with Christian Danielsson, former Director General at the Commission for Neighbourhood Policy and EU Enlargement Negotiations.

- The 1st spot is occupied by **EuroMed Rights**, recipient in 2018 of two Open Society grants (one for US \$1.5 million, the other for US\$50,016). Several other NGOs in 3rd position are worth mentioning:
- **OXFAM** has received 23 donations, totalling several million dollars, as reported in the database on the Open Society website. A cross-search on LinkedIn also highlights the revolving door mechanism between the two NGOs where staff is concerned.
- **Human Rights Watch**.
- **European Endowment for Democracy (EED)**: While the EED does not receive grants from the Open Society, the reverse is true. An initiative for Open Society Ukraine has been announced, starting on 1 January 2020 and ending on 31 December 2020. Based in Odesa, Open Society of Ukraine (OSU) provides an independent and impartial platform for training and supporting activists involved in current issues at the municipal level and in the electoral process. With the assistance of the ERDF, OSU is enhancing the skills of activists, equipping them with the tools to make a social impact in the city of Odesa and, for a select few, to stand in the municipal elections scheduled for October 2020.This training programme is designed to empower civil society groups to play a pivotal role in the ongoing reform efforts and to foster greater public involvement in the city's development. On 21/02/2019, EED organised a conference on Georgia made up entirely of Soros networks: one speaker from Transparency International, two speakers from Open Society, one speaker from the Georgian Young Lawyers Association (GYLA).
- **Arab NGO Network for Development (ANND)**. This NGO's partners include the WIEGO Network (Women in Informal Employment: Globalizing and Organizing), funded to the tune of nearly US\$2 million by Open Society between 2017 and 2019; the Euromed France network; CEE Bankwatch Network, which received US\$250,000 from Open Society between 2017 and 2019 (but also funded by Soros's NGO well before that, and by other Soros NGOs such as the Revenue Watch Institute, formerly known as the Natural Resources Governance Institute (NRGI)), and so on.
- Tied for 9th place are **Amnesty International** and the **International Rescue Committee**.

Synthesis:

EuroMed Rights	Norwegian Refugee Council Europe	OXFAM
Human Rights Watch	European Endowment for Democracy	IKV, Foundation for Economic Development
Arab NGO Network for Development	International Rescue Committee	Amnesty International EU

Other portfolios in the Top 10

OSEPI also features in other top 10 lists. As the logic of networks and nebulas has already been clearly explained with suitable examples, here we will simply report on the position of the Open Society:

- **Humanitarian aid: 8th position.**
- **Economy and fiscal policy: 6th position.**
- **Competition: 4th position.**

The von der Leyen Commission

Several portfolio names have changed. OSEPI remains in the top 10 for the majority of them. However, it is important to note that the figures should be viewed in the context of an ongoing mandate.

- **Égalité:** 2nd place, with four meetings: three were on the topic of the Roma community, the last (and most recent), dated 08 December 2020, was about ‘the CCIF [formerly funded by Open Society] and the situation for civil society organisations in France’.

Synthesis:

European Women’s Lobby	European Disability Forum	Women Political Leaders ⁽⁸⁶⁾
European Network Against Racism	ILGA-Europe	Eurocities
End Female Genital Mutilation EU	International Planned Parenthood Federation EU	Disability Rights International

86. One of the 12 partner NGOs is the Gates Foundation. This is for information purposes only, as the WPL has a particularly large number of partners. Since January 2021, the WPL Office has also been home to Dr Obiageli Ezekwesili, a former senior economic adviser to the Open Society’s New York office (June 2012 - January 2016, according to her LinkedIn profile). Again, for information only, given this person’s substantial CV.

- **Values and Transparency:** joint 5th position. Most of the other positions are held by Open Society satellites: Reporters Without Borders (1st position), Free Press Unlimited (2nd position), Committee to Protect Journalists (3rd position), European Centre for Press & Media Freedom (4th position, funded in particular by Free Press and Justice for Journalists - whose board includes Jeff Gedmin, former president of Radio Free Europe / Radio Liberty, a Soros creation), European Movement International (5th tied position), GLOBSEC (ditto), Centre for Democracy & Technology (ditto, already seen), International Press Institute (ditto ; The Open Society is listed among the organisation’s donors, although Soros’ NGO database does not mention any grants).

Synthesis:

Reporters Without Borders	Free Press Unlimited	Committee to Protect Journalists
European Centre for Press & Media Freedom	European Movement International	GLOBSEC
Center for Democracy & Technology	EURACTIV Foundation	International Press Institute

- **President of the Commission: 8th position.** In 5th position is the Pandemic Action Network, which in addition to the Gates Foundation and many others, is also a partner of Internews, ONE and the Open Government Partnership, funded by the Open Society.

87.Gergely Koevesd (Eurostat), Sorina Vaju (Eurostat Directorate-General), Dora Husz (team leader at the Commission, having previously worked in the Directorate-General for Employment, Social Affairs and Inclusion and the Directorate-General for Communication), Ilcho Bechev (Eurostat), Lia Potec (policy officer at the Commission, having previously worked for the Romanian Ministry of Foreign Affairs), Henriett Horváth (assistant at the Commission), Csanad Sandor (economist), Benedikt Urban (Blue Book trainee), etc.

88. Norbert Pál (advisor), Fran Stojaković (accredited parliamentary assistant, S&D Group), Francesca Bellino (trainee with The Greens / European Free Alliance), Anna Krózszer (former accredited parliamentary assistant with the Committee on Civil Liberties, Justice and Home Affairs - LIBE), etc.

89. Cristian Ganj (legal adviser to the administration), Monika Kopcheva (director of IT security), Jonathan van Blaaderen (lawyer-linguist), etc.

90. Marina Vasić (Programme Manager), Olga Frayshteter (Policy Advisor), Bogdana Buzarnescu (Senior Assistant to the Committee for Social Affairs, Health and Sustainable Development), Arman Darbinyan (Deputy Director of the Department of Safety and Security), etc.

Additional information on Soros networks

Transparency International (briefly)

While the Open Society remains George Soros’ NGO, other key names need to be taken into account to understand the extent of the influence of the billionaire’s networks on the European Commission. We will limit ourselves here to examining the presence in the Top 10 of Transparency International, an NGO closely associated with Soros, in the Juncker Commission:

- **Euro & financial markets: 1st position (9 meetings).**
Other Soros network NGOs: Better Finance, Finance Watch, OXFAM, Eurodad.
- **Home Affairs: 2nd position (4 meetings).**
Other Soros network NGOs: Amnesty International, Centre for Democracy & Technology, Libraries Without Borders.
- **Economics & Fiscal Policy: tied for 1st place (with OXFAM in particular, 4 meetings).**
Other Soros network NGOs: Eurodad, Bertelsmann Stiftung, Social Platform.

Central European University

The Central European University operates more or less along the same lines as Gavi for the Gates Foundation: to understand the influence of an NGO on the development of European legislative processes, we believe it is essential to have a systemic view of its environment - if not an exhaustive one. The Central European University (CEU), founded by Soros in Hungary and relocated to Berlin in 2018, is listed in the Transparency Register as a category IV entity, sub-categorised as a university institution.At the European level, the university has 10 staff and 2.5 full-time equivalents, and a total budget of €90 million. For the financial year ending July 2020, CEU received €23 million in grants from the European Union, from several sources: the Horizon 2020 programme, the Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL), and the Education, Audiovisual and Culture Executive Agency (EACEA). While the University does not appear to have held any meetings with members of the Commission since the reporting obligations of 25 November 2014, two have taken place in 2021, according to the list provided by the Commission and updated on 11 April 2021: a video conference with Alvaro De Elera, member of Věra Jourová’s cabinet on the rule of law (20 January 2021), and a second video conference, with Věra Jourová herself to discuss the rule of law (24 February 2021). It would be inaccurate to limit the influence of Central European University to these few elements, as several other examples demonstrate .A cross-search on LinkedIn, for instance, reveals that Central European University graduates go on to work for the European Commission (87), the European Parliament (88) and the Council of the European Union (89) - in a variety of positions. Even if they are not directly attached to the European institutions, some are working at the Council of Europe and some at the European Court of Human Rights, which has close links with George Soros, as Gregor Puppink has documented. The European Commission’s Transparency Register also states that the Central European University is part of two networks:

- **CIVICA - The European University of Social Sciences**, which brings together eight universities (including Sciences Po in France).
- **The European University Association** (EUA), a prominent organisation that plays a crucial role in the Bologna Process, a key initiative to harmonise European higher education systems. It also exerts significant influence on European Union policies related to higher education, research, and innovation. This association unites approximately 800 organisations under its umbrella.

About Category IV entities

As with NGOs, think tanks and academic institutions are also influential bodies within the European Commission, as readers will see if they refer back to Integrity Watch. These think tanks are no more independent than NGOs and sometimes have the same financial backers. For instance, consider the first think tank in the Top 10 of the 'Climate & Energy' portfolio under the Juncker Commission, Third Generation Environmentalism Ltd, or E3G, which is dedicated to the energy transition. A review of its financial supporters underscores the economic interests that this organisation serves as a front for:



Public consultations : a key lever of influence

The European Commission regularly invites a variety of organisations and individuals to express their views on various projects and their opinions in the run-up to draft legislation. This is an ideal way of putting forward recommendations. To date (91), 2,168 initiatives have been published, covering the 40 topics dealt with by the European Commission. Details of these can be found in the dedicated section of its website:

- Initiatives may be at various stages of development: in preparation; roadmap; public consultation; draft law; adoption by the Commission.
- Actions are divided into five categories: communications; delegated actions; implementing actions; draft legislation; other.

Identifying lobbying: The European Commission's 'Better Regulation Toolbox'

As the number of participating organisations increases in an initiative, it becomes increasingly challenging to differentiate the genuine impact of each participant on the subsequent direction taken by the Commission. However, the European Commission has developed a tool that appears to be particularly effective in identifying attempts at more or less disguised campaigning by entities within this type of consultation: the 'Better Regulation Toolbox'. When a consultation summary report is published, this tool is used to specify cases where it has identified a 'campaign', i.e. where more than 10 responses appear to be identical. For example, the ambiguous and nebulous nature of the BLOOM Association is described below:

Identified campaign:
In open comments of this public consultation, we identified a "campaign" (as specified in the Better Regulation Toolbox 2), meaning where organisations call their members to participate in the consultation with suggested responses, and more than 10 responses are identical. We include the share of contributions and their viewpoints when presenting our analysis of open comments. The campaign did not extend to closed questions, where responses within the campaign group varied.

Fifty contributions have been identified as originating from a campaign. They were from respondents based in France (n=32), Belgium and United Kingdom (n=4, respectively), Portugal (n=3) Netherlands and Spain (n=2, respectively) and Germany, Ireland and Sweden (n=1, respectively). 37 respondents gave their contribution as EU citizens, 12 as non-governmental organisations, and 1 as "other".

As the case of BLOOM highlights, this approach makes it possible to pinpoint cases where a nebulous group or network of NGOs influence decisions in a way that runs counter to the recommendations of other stakeholders - in this case, associations of fishing professionals. With this toolbox (available in English only), the Commission has established a methodology that we believe to be sound. For elements that are of interest to us at present, please refer to Chapter 7, 'Stakeholder consultation', tools 54 ('Conduct of consultation activity and data analysis') and 55 ('Information on policy development'). Subsection 5.2.3 of Tool 54 is devoted to 'Campaigns'. To introduce this sub-section, the Commission reports that 'when respondents replied to a public consultation with the same answers, this could be a coincidence as well as the result of a coordinated campaign.

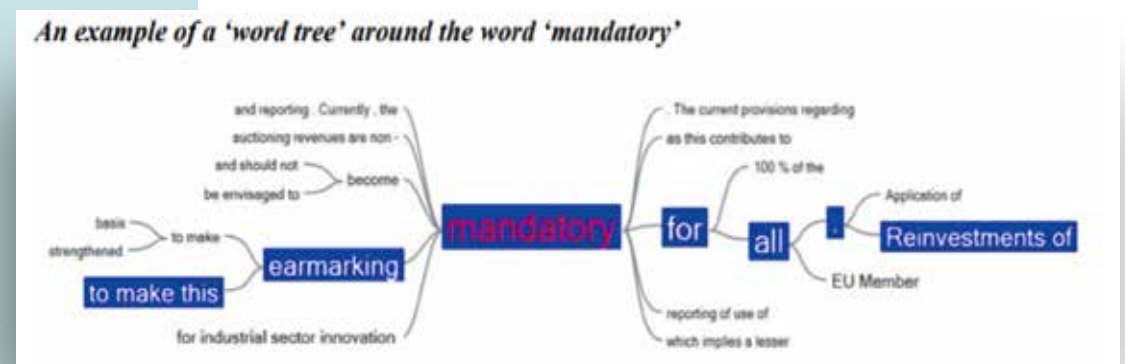
91. On 10 June 2021.

92. Emphasised by the Commission.

Campaigns are very effective in generating stakeholder interest and highlighting key messages for policymakers. At the same time, they present a challenge for those analysing the responses to the public consultation (92). It is therefore essential to identify the campaigns clearly, analyse them separately and present the results appropriately. It is therefore necessary to bear in mind the potential presence of campaigns, find ways to identify them and present the results'.

To keep track of this phenomenon, the Toolbox prescribes continuous monitoring of the public consultation once it has been launched, specifying that 'occasional searches on the Internet and social networks could reveal the presence of organised campaigns that suggest answers to the [consultation] questionnaire'. As for the type of questions, the Commission considers that similar answers to all closed questions suggest a campaign, 'particularly if respondents represent a specific sub-group of stakeholders (by activity and/or interest and/or location)'. The Commission considers it to be a campaign if 10 similar answers are given. However, to take account of the scale of the number of respondents and to distinguish between a coincidence and a campaign where there were 10 similar answers in a consultation involving several thousand feedbacks, the Commission relies on analysis software (STATA, DIGIT).

In relation to open-ended questions, the Toolbox notes that certain campaigns may advise their supporters to use standard text in their answers, with the understanding that while the answers may not be identical, the core messages will be reiterated. The Commission once again recommends the use of software for analysing qualitative data (such as its own 'Doris' or other available software), providing an example of a 'word tree' illustrating the method used by these campaigns to give a false appearance of diversity:



The Toolbox specifies that the most recurrent occurrences are those that appear framed, i.e. in this case 'to make this earmarking mandatory for all. Reinvestments of '

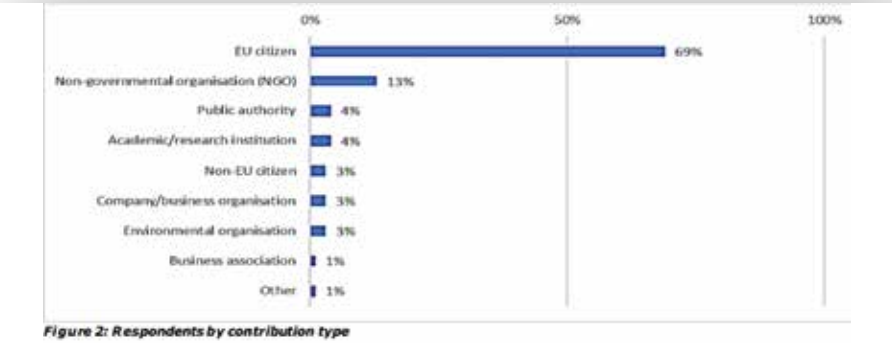
In terms of reporting, it is specified - and explicitly underlined - that if campaigns are identified as such, this must be indicated in the summary report.

Examples of identified campaigns

Deep-sea fishing in the North-East Atlantic

From 13 May to 05 August 2020, the European Commission opened a public consultation to solicit opinions on the evaluation of the Deep Sea Access Regulation. The Commission said it was 'particularly keen to hear the views of the general public; fishermen and fishermen's organisations and representatives; interest groups, e.g. academia, think tanks, NGOs'.

With regard to the objectives of the consultation, the Commission stated that 'this evaluation will make it possible to identify key actions aimed at improving the effectiveness, efficiency, impact and European added value of the Regulation.[...]. Gathering feedback from citizens and stakeholders is vital for this evaluation, as it will help to determine the positive effects of the regulation and any undesirable effects for stakeholders. Finally, the results of this evaluation will inform decisions on the need to review the Deep Sea Access Regulation.



The list of contributions does not allow for a precise assessment of the nature of all participants. Out of 156 feedbacks, the downloadable Excel file only specifies the nature of 60 of them. However, the Commission's summary report, published on 14 December 2020, states that the contributions whose nature is not specified are from European citizens, giving the following breakdown of all participants:

In addition, the categorisation of certain stakeholders requires correction to ensure consistency with the Commission's Transparency Register. BLOOM, Ocean Unite and Verein Plastic Planet Austria (93), category III entities, are not labelled as 'NGOs' but as 'environmental organisations'. The same applies to Generation Climate Europe (a group of 460 national organisations spread across 47 countries), a category III entity classified as 'other'. This gives us 22 NGOs. In its assessment of 12 May 2021, the European Commission nonetheless noted that among the NGOs responding, the Deep Sea Conservation Coalition expressed itself both as a group and via several of its member NGOs individually.

93. Its full name is Verein Plastic Planet Austria Plastikreduktion.

94. Vzw is a Belgian acronym for a non-profit organisation.

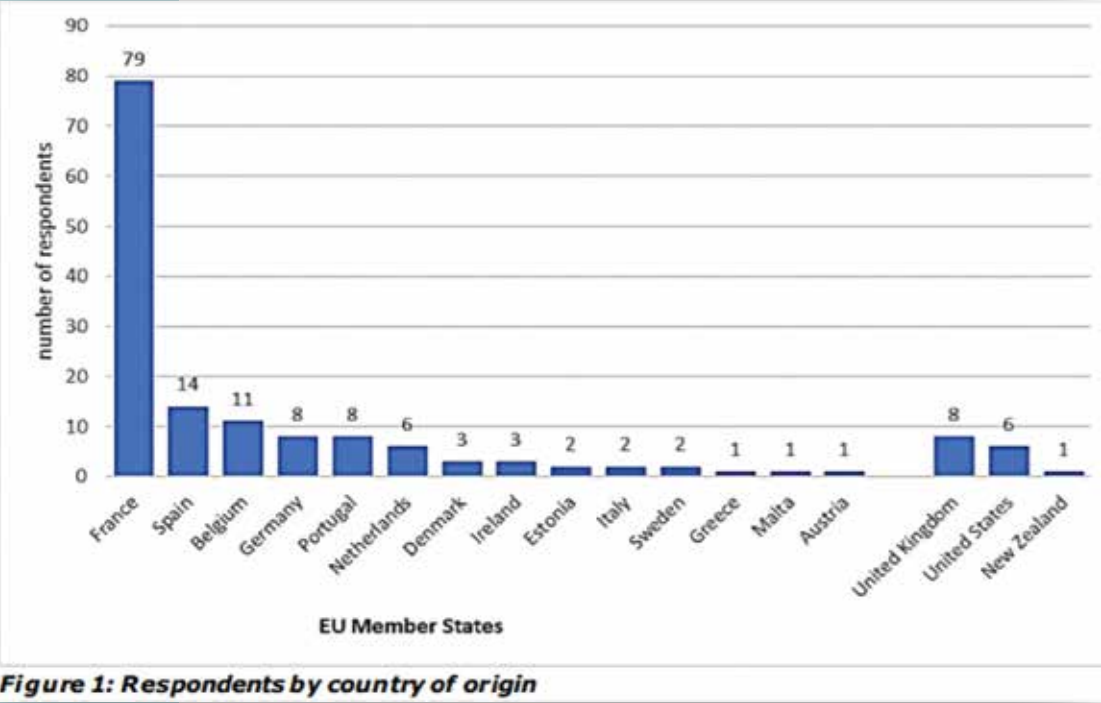
Contributing NGOs		
BLOOM	Ocean Unite	Verein Plastic Planet Austria
Deep Sea Conservation Coalition	Oceana	DEEPWAVE e.V.
Portuguese Society for the Study of Birds (partenaire de Birdlife)	Grupo de Estudos de Ordenamento do Território e Ambiente (GEOTA)	Marine Conservation Society
Our Fish (Funding Fish)	Greenpeace European Unit	Ecologistas en Acción
Sea First Foundation	Sciaena	ANP WWF : Associação Natureza de Portugal (partenaire du WWF)
Good Fish Foundation	Seas At Risk vzw ⁽⁹⁴⁾	SUBMON
WWF Sweden	The Danish Society for Nature Conservation	Sustainable Water Network (SWAN)
Generation Climate Europe		

Nevertheless, the European Commission's methodology allows us to conclude that participation in this public consultation is not limited to the expression of independent opinions, but is in fact coordinated. The summary report states that it has identified a 'campaign', as defined by the 'Better Regulation Toolbox' drawn up by the Commission and presented above. It is notable that more than 10 answers appear to be identical, and the inset specifies that 50 inputs were identified as coming from a campaign. Of these, 32 originated from France:

Identified campaign:
In open comments of this public consultation, we identified a "campaign" (as specified in the Better Regulation Toolbox 2), meaning where organisations call their members to participate in the consultation with suggested responses, and more than 10 responses are identical. We include the share of contributions and their viewpoints when presenting our analysis of open comments. The campaign did not extend to closed questions, where responses within the campaign group varied.

Fifty contributions have been identified as originating from a campaign. They were from respondents based in France (n=32), Belgium and United Kingdom (n=4, respectively), Portugal (n=3) Netherlands and Spain (n=2, respectively) and Germany, Ireland and Sweden (n=1, respectively). 37 respondents gave their contribution as EU citizens, 12 as non-governmental organisations, and 1 as "other".

France alone accounts for just over 50% of respondents (see graph below). Despite not being able to provide definitive proof, we can put forward the hypothesis that this is a campaign originating from the BLOOM Association's ecosystem, as evidenced by the screenshots below identifying 'campaign' answers. It shows that in response to a question, 34 respondents identified as belonging to this campaign cited a January 2017 document from the BLOOM Association website, which the latter had drawn up with the Deep Sea Conservation Coalition.



The report - whose screenshots we have included here - identified six answers as coming from the campaign in question:

In open comments, 124 respondents contributed answers to the question on **how better protection of deep-sea fish stocks and deep-sea vulnerable marine ecosystems could be ensured**. The most commonly mentioned examples were:

- to put **more restrictions** in place for deep-sea fishing and bottom trawling, and establish a more **punitive system** in cases where restrictions are ignored;
- to **close areas with VME encounters** / **improve the move-on rule** and base the **threshold for identifying VME encounters on scientific evidence**;
- to gain a **better understanding of the deep-sea environment through scientific research**;
- to **improve criteria for identifying deep-sea fishing activity** and for **granting fishing authorisations**.

50 contributions were part of the identified campaign, which also reflected all the examples listed above. The campaign also stated that a **buffer area surrounding encountered VMEs should be closed to bottom fishing immediately** and **criteria for identifying deep-sea fishing activity and for granting fishing authorisations should be improved by**: i. assessing whether the current catch amount thresholds are appropriate; ii. assessing whether there is a need to expand the list of species; iii. recognizing that the Regulation is largely designed to manage fisheries to prevent damage to deep-sea ecosystems and should apply to any bottom contact fisheries operating below 400m, irrespective of the catch.

In the open comments, 89 respondents elaborated on any **additional measures** that, in their opinion, would have been relevant to **prevent significant adverse impacts on Vulnerable Marine Ecosystems** and to ensure the long-term conservation of deep-sea fish stocks. The most frequently cited measures were:

- to conduct **impact assessments** prior to granting fishing authorisations in all waters;
- to further **restrict fishing gear** with a known negative impact on VMEs and bycatch species, underpinned by **scientific research to identify such gear**;
- to tailor **evidence-based provisions for setting of fishing opportunities** and adhere to them rigorously, even where scientific data is insufficient on the status of fish stocks.

49 contributions were part of the identified campaign, which also reflected all the examples listed above. The campaign further specified that specific provisions related to the setting of fishing opportunities should be tailored to scientific uncertainties and the life history characteristics of deep-sea species, and that explicit requirements to assess, minimize and prevent bycatch and other impacts on non-target deep-sea species and the vulnerability of the habitats where the species live are important for the long-term conservation of deep-sea stocks. The contributions suggested that these measures could be developed and implemented as part of the action plan to conserve fisheries resources and protect marine ecosystems of the biodiversity strategy, referencing the Communication from the Commission – EU Biodiversity Strategy for 2030 (20 May 2020).

In the open comments, 81 respondents replied to whether they could think of any **additional measures** that would have been relevant to **improve the knowledge on deep-sea species and their habitats**. The most frequently cited measures were:

- to **increase funding** for deep-sea research;
- to **increase observer coverage** and make information obtained through observers **publicly available**;
- to make the **use of remote electronic monitoring systems mandatory**.

50 contributions were part of the identified campaign, which specified measures such as the implementation of fully-documented fisheries provisions (incl. mandatory use of Remote Electronic Monitoring Systems) in vessels targeting deep-sea species; publication of information on the observer programme and its evaluation; and mandatory observer coverage.

There were **significant differences** in responses by main field of activity, with respondents who worked in **fisheries** generally agreeing **more strongly** that deep-sea fish species are exploited sustainably and that deep-sea ecosystems, and in particular Vulnerable Marine Ecosystems, are adequately protected from adverse impacts generated by bottom fishing activities, **than those who worked in the field of environment and "other" (predominantly EU citizens)**.

In the open comments, 69 respondents elaborated on their answers, **48 of which were part of the identified campaign**. Explanations were consistent across both groups (campaign and non-campaign respondents), and stated that:

- **scientific knowledge** has improved, but not due to the Regulation, but independent scientific research, surveys and expeditions (incl. through EU funded deep-sea research projects such as the Atlas, SponGES, and Mercedes Projects), and still remains **insufficient**;
- the **800m trawl ban is effective** in protecting VMEs, but needs to be **enforced**, as no

VME areas have been closed to date and the trawl ban has not been effectively complied with and enforced.

Finally, respondents were asked to what **extent the DSAR takes onboard UN**

In the open comments, **47 respondents** elaborated on their answers, **of whom 34 were part of the identified campaign**. The campaign respondents quoted the **Bloom Association's** document¹ stating that the **Regulation takes into account many of the UN recommendations**, but **not** the most recent recommendations adopted by the UN following reviews of the implementation of resolutions 61/105 and 64/72, namely resolution 66/68 adopted in 2011 and, more recently, resolution 71/123 adopted in 2016. Respondents noted that these additional elements should be incorporated into the implementation of the DSAR, for example, with regards to the use of "benthic ecosystem modelling, comparative benthic studies and predictive modelling" to identify areas in which VMEs are known or likely to exist.

At the end of the survey, respondents could provide **additional comments** in open comments. Overall, **49 respondents** provided additional comments, **of whom 32 were part of the identified campaign**. Comments predominantly centred on the **need for measures of the Regulation to be rigorously enforced and monitored**, rather than the Regulation being revised. Respondents also suggested that **other tools for the conservation of deep-sea stocks and habitats are explored**, such as CFP, the Technical Measures Regulation, or the upcoming Action Plan of the Biodiversity Strategy. Campaign respondents also cited an ICES report of the Working Group on the Biology and Assessment of Deep-Sea Fisheries Resources, which shows that the highest biodiversity of species can be found in depth between 1000 and 1500m, and that these species are particularly vulnerable to overexploitation due to their life history traits.

However, the Commission's working document of 12 May 2021 evaluating Regulation 2016/2336 concluded that the regulation is functioning effectively. For the time being, it is not responding to requests from NGOs.

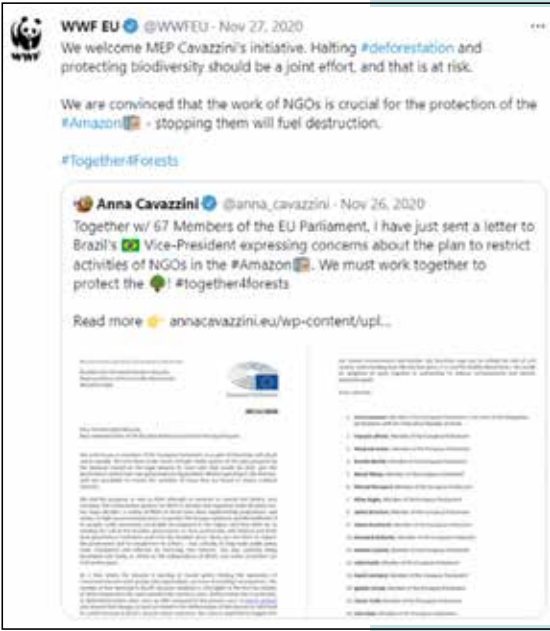
Deforestation

In 2020, WWF launched the 'Together4Forests' campaign with the aim of eliminating deforestation and ecosystem destruction from the supply chain through strong European legislation. WWF EU reports that the campaign has garnered support from over 160 organisations and mobilised nearly 1.2 million citizens, making the public consultation on this topic – which ran from 3 September 2020 to 10 December 2020 – 'the second largest public consultation in the history of the European Commission'. The summary report drawn up by the Commission corroborates this: "This number was largely steered by a group of NGOs including ClientEarth, Conservation International, Environmental Investigation Agency, Greenpeace and WWF using pre-filled questionnaires. Of the 1,194,761 answers, 1,193,611 were identified by the Commission as being submitted as part of this campaign, using a methodology known as the "key-collision clustering algorithm". In accordance with the recommendations of the Better Regulation Toolbox, these answers have been kept separate and analysed independently from the answers that do not fall within the scope of this campaign. The content of the pre-filled questionnaire submitted as part of the campaign can be accessed online. Of the respondents to the campaign, 73% stated that they were from a European country, compared with 27% from outside Europe. The countries with the highest number of answers were Germany (15%), the Netherlands (11%), France (10%), the UK (7%) and Belgium (7%).

The Together4Forests campaign has also been successful in mobilising MEPs. On 26 November 2020, Greens/European Free Alliance MEP Anna Cavazzini posted a tweet reporting that she had sent a letter on the Amazon issue, co-signed by 67 other MEPs, to the European Vice-President. The tweet included the hashtag #together4forests and was picked up by the WWF's European Twitter account. To date (2 June 2021), the Commission has not yet adopted the legislation resulting from this consultation. The process is scheduled for the 2nd quarter of 2021. However, back in October 2020, the European Parliament called in a plenary session for 'binding legislation to stop global deforestation caused by the EU'. On 22 October 2021, the European Parliament presented its resolution 'containing recommendations to the Commission on an EU legal framework to halt and reverse global deforestation for which the EU is responsible'.

In its "Consideration B", the resolution refers to the "Living Planet 2016" report published by the WWF jointly with the Zoological Society of London and the Stockholm Resilience Centre (note 17 of the resolution), to explain that forests "constitute the vital organic infrastructure of some of the densest, most delicate and most varied ecosystems on the planet; that deforestation is the most serious threat to 85% of endangered and threatened species, and that between 1970 and 2012, 58% of vertebrate animals have already disappeared from the Earth's surface because of deforestation".

95. The campaign has amassed a considerable number of supporters. However, we have identified a well-established method of amplification employed by NGOs: each national chapter of an NGO is regarded as an independent organisation. Prominent examples include BirdLife, appearing at least eight times, the Jane Goodall Institute, Greenpeace (13 times) and WWF (24 times). Other major NGOs such as Transport & Environment, Transparency International and the European Environmental Bureau are also featured.



Water Framework Directive

In June 2020, the Environment Commissioner, Virginijus Sinkevičius, announced that the Water Framework Directive would not be open to revision, a decision that was widely welcomed by the WWF's #ProtectWater campaign as 'a major victory'. The initial roadmap for this initiative, from 20 October 2017 to 17 November 2017, had gathered 82 opinions. Almost a year later, the public consultation on the subject was held from 17 September 2018 to 12 March 2019. The Commission's summary report revealed that they received 387,057 responses, 385,113 of which were directly linked to the #ProtectWater campaign led by WWF with the support of other environmental NGOs in the Living Rivers coalition, including the European Environmental Bureau, European Rivers Network, European Anglers Alliance, and Wetlands International. As with the #together4forests campaign, many organisations supported the campaign, with a list sometimes showing several chapters of the same NGO, national (e.g. BirdLife, WWF) or regional (e.g. France Nature Environnement). The Commission also identified three other campaigns, but was unable to determine their origin:

WWF campaign	383,987
Campaign 1 - source not identified	507
Campaign 2 - source not identified	39
Campaign 3 - source not identified	12
Assumed mis-function during WWF upload	568
Total campaign responses	385,113

Table 1 - Breakdown of campaign-based responses to the public consultation.

In its 2019 annual report, WWF presented its campaign as the third largest in the European Union in terms of the number of respondents.

Brief details about WWF

WWF is the world's leading environmental NGO. For 2020, its European office (WWF EPO) had a budget of €4.79m, including €1.1m from trusts and foundations & around €850,000 in public grants from European Commission programmes: European Commission LIFE NGO Operating Grant, Horizon 2020, the Development Education and Awareness Raising Programme (DEAR), and the Directorate General for Migration and Home Affairs. Its ability to influence and mobilise is particularly important. Between 13 November 2014 and 19 May 2021, WWF EPO took part in 166 meetings with Commission officials, to more than 30 public consultations, 22 roadmaps, one European Parliament intergroup and 20 Commission expert panels. The NGO's European office also has 35 people assigned to European activities, representing 26.2 full-time equivalents. In 2014, WWF's European Policy Office was named NGO of the Year. This was the third time in seven years that WWF had won the award, highlighting the effectiveness of its lobbying at European level. The award was presented at the European Public Affairs Awards in recognition of the effectiveness of its lobbying on two campaigns in particular:

- 'Stop bankrupting our oceans', which would have helped to improve the EU's Common Fisheries Policy and restore fish stocks. The list of meetings of entities registered in the Transparency Register does not allow the chronology of meetings to be traced back beyond November-December 2014. Nevertheless, a WWF meeting dated 04/12/2014 focused on the implementation of reform of the Common Fisheries Policy. The NGO had talks with Commissioner Karmelu Vella (Environment, Maritime Affairs and Fisheries) and two members of her cabinet.
- 'Well-spent', the aim of which was to "green" the EU's seven-year budget reform.

Green taxonomy

The European Commission mandated the E03603 group, made up of 27 Member States and 5 European public bodies, to work on green taxonomy (i.e. economic activities compatible with the fight against global warming). At the same time, a public consultation was launched. Between 23 March and 27 April 2020, this phase of the consultation received 413 feedbacks, 35% of which came from EU citizens, including 36% from France and 20% from Belgium.

The draft legislation resulting from this roadmap was then open to consultation from 20 November to 18 December 2020. During this period, almost 46,600 responses were received, of which almost 98% came from EU citizens, including 38% from France and 34% from Germany. On 04/06/2021, the Commission published an impact assessment report analysing the public consultation on this draft legislation. According to the European Commission's Toolbox, the large number of responses came from several campaigns. The largest, with 44,774 contributions, was identified as coming from "NGOs and citizens" gathered around stopfakegreen.eu:



2.10. Feedback on the draft delegated act: November-December 2020

The draft delegated act was published on 20 November 2020 for a 4-week feedback period. Stakeholders were able to provide comments until 18 December 2020. The draft delegated act has attracted a great number of comments. **Overall, the Commission has received 46 591 responses in total.** There was a large campaigning activity detected, which was for the most part connected to one campaign by NGOs and citizens supporting their propositions ("stopfakegreen.eu" campaign). Specifically, 44 774 contributions received were clearly associated with this campaign. For this and further identified campaign, please refer to a short overview below. Feedback is further summarised per sector.

Main campaigns identified

Several campaigns were detected in the provided feedback, with one clearly standing out with its size. This table below provides a brief overview of the main identified campaigns, which were carefully considered in the balance of stakeholders requests under specific sectors. Several other responses could be potentially counted as campaigns, but these had up to 30 responses and were more disparate, hence they are not detailed in this table¹³².

Campaign (working title)	Approximate size	Main stakeholder types	Campaign focus and key messages
Stopfakegreen.eu campaign	44 774 contributions	Citizens and NGOs	Support for high environmental ambition of criteria and further strengthening of some criteria (notably bioenergy) or removal of some activities (e.g. shipping, livestock production)

The website of this campaign, whose main objective is "to support a high environmental ambition of the criteria [of this taxonomy] and to strengthen some of them (notably bioenergy) or to remove some activities from them (for example freight transport and intensive livestock farming)", remains accessible thanks to the Wayback Machine. However, we have to turn to another source to find the signatories of Stopfakegreen's campaign letter, which was primarily addressed to the Commission Presidency. Most of them are NGOs, some of them influential and well placed in the top 10 of meetings with the European Commission:



A comparative analysis: from NGO recommendations to European provisions

On many European issues, NGOs make recommendations, the influence of which can regularly be found, sometimes very precisely, in several laws and regulations. In order to measure this, a comparative review of NGO recommendations and key elements of European legislation is instructive.

European climate law

WWF's 2020 report highlights that the European Union is the first climate region to have introduced climate legislation (dated 4 March 2020), 'enshrining a 2050 climate neutrality target'. On 8 October 2019, WWF and Greenpeace published an article urging the Commission to follow their 12 recommendations, as published in a document dated 20 November 2019. We also find similar requests from other NGOs:

- **Point 3** (WWF & Greenpeace): Reduce greenhouse gas emissions from -40% to -65% by

2030 - proposals shared by the European Environmental Bureau and Birdlife International (point 1 of its requests). Points 3 and 4 of Article 2 of the law (Climate Neutrality Targets) seek to implement legislation raising these targets from 50% to 55% by 2030. However, the regulation was amended on 17 September 2020, resulting in the deletion of points 3 and 4. But the reduction target, set at 55% for 2030, remains in Article 2. An additional lobbying effort on this 55% target was carried out by the NGO Institutional Investors Group on Climate Change (IIGCC) (97), in a report published in September 2020 (recommendation no. 1, p.5). This version also amends Article 1. The March version 'sets a binding objective of climate neutrality within the Union by 2050'. The September amendment adds that the regulation 'also sets a specific binding target for reducing the Union's net greenhouse gas emissions by 2030'.

- **Point 5:** Implement a five-yearly review mechanism for the strategy, as requested in points 1 and 2 of Article 5 of the law (Evaluation of progress and European Union measures). This request was also made by Birdlife International in point 6, as well as the NGO ECOLISE (98) and Carbon Market Watch.
- **Point 9:** Ensure a just transition for all, as requested in point 3.h of article 3 of the law. Point 9 of the WWF & Greenpeace report also advocates the deployment of personalised national and regional measures. With regard to the national aspect, this is taken up in article 6 of the law. The same point 9 calls for local communities to be able to participate.
- **Point 12:** Involve European citizens. This point, which is also supported by ECOLISE, builds on the request from point 9 regarding the capacity of communities to participate. Point 12 calls for the 'inadequacy' of public consultations to be replaced by processes of participatory or deliberative democracy. Article 8 of the Climate Law (Public Participation) reiterates this recommendation, stating: "The Commission shall facilitate an inclusive and accessible process at all levels, national, regional and local, and with social partners, citizens and civil society, to exchange good practice and identify actions to help achieve the objectives of this Regulation."

97. Similar to Global Citizen, the IIGCC is an NGO that in reality has nothing to do with 'civil society' or citizens. Its members are essentially economic forces (including asset management funds), as its name implies.

98. ECOLISE stands for European Network for Community-Led Initiatives on Climate Change and Sustainability. The NGO is a member of the Climate Action Network Europe and SDG Watch Europe (i.e. the Sustainable Development Goals Watch).

99. For information purposes, the Agency's catalogue lists 607 documents on its website that mention WWF: 308 for the NGO's Central Asia branch and 299 for its UK branch. Page consulted on 28 April 2021.

100. The day before this communication, the European Parliament think tank also urged that these solutions be used as quickly as possible.

Although the WWF expressed its disappointment at the law that was finally passed in a press release dated 21 April 2021, the NGO nevertheless welcomed the fact that the law decided to establish a European scientific advisory committee on climate change, whose members would be appointed by the EU Member States via the Management Board of the European Environment Agency (99). This aligns closely with the request made in point 11 of the WWF & Greenpeace document and by ECOLISE, which called for the establishment of an independent scientific body. On 24/02/2021, the European Commission published a communication addressed to other European bodies: 'Building a resilient Europe - the EU's new strategy for adapting to climate change'. This communication incorporates other recommendations made by a number of NGOs.

• **Point 11** of the Commission communication aims to 'promote nature-based adaptive solutions' (100), whose 'widespread use [...] would strengthen resilience to climate change and contribute to several other objectives of the Green Pact for Europe [...] In coastal and marine areas, nature-based solutions will strengthen coastal protection and reduce the risk of algal blooms. Concurrently, they will offer benefits such as carbon capture, opportunities for tourism development, and the conservation and restoration of biodiversity'. WWF & Greenpeace **point 4** called for 'an adequately funded programme of nature-based solutions. This should be based on approaches such as ecosystem restoration that build climate resilience and help tackle the biodiversity crisis'. **Point 2** of Birdlife International's requests broadly repeated the same demands (solutions, funding). Point 4 from WWF & Greenpeace also called for the implementation of new mechanisms to accelerate carbon capture, which the Commission has also provided for:

The Commission:

- will propose nature-based solutions for carbon capture, including measurement and certification, in future initiatives on carbon storage in agricultural soils;
- will develop the financial aspects of nature-based solutions and encourage the development of financial approaches and products that also cover nature-based adaptation;
- will continue to encourage and support Member States to deploy nature-based solutions through assessments, guidance and capacity-building activities, as well as EU funding.

• As outlined in **points 8** from the WWF & Greenpeace and **point 3** from Birdlife International, new policy measures and adequate legislation are required to protect and restore the world's forests. In point 13, titled 'Accelerating the deployment of adaptive solutions', the Commission states that it will 'integrate adaptation into the update of the Natura 2000 and climate change guidelines, as well as into the guidelines on biodiversity-friendly afforestation and reforestation practices and the next forest strategy'.

European Social Fund (ESF+) to assist migrants

PICUM (Platform for International Cooperation on Undocumented Migrants) is a leading NGO, whose influence even extends to the United Nations and the Global Forum on Migration Development (101). Its own website is funded by the European Commission's Directorate-General for Employment, Social Affairs and Inclusion. In its 2019 annual report, the NGO states that it has continued its lobbying work with the NGO ECRE (European Council on Refugees and Exiles) to influence the position of European co-legislators on proposals for the European Social Fund (ESF+) and the Migration, Integration and Asylum Fund.

In March 2019, the two NGOs published a joint report on the subject, 'Promoting the socio-economic inclusion of migrants and refugees in the next European budget (2021-2027)'. As with the work of other NGOs, a review of the support for this report clearly demonstrates the European Commission's receptiveness to the arguments of PICUM and ECRE. The final page of the report states that the latter received support not only from EPIM but also from the European Union's Employment and Social Innovation Programme. The screenshot below provides further information that prompts questions, particularly regarding the legitimacy of an NGO that receives funding from outside organisations, two (now three) of which are from outside the EU.

- George Soros' **Open Society Foundations**, American.
- Sigrid Rausing Trust, UK (102) (although its founder, Sigrid Rausing, is Swedish). (102)
- **Adessium Foundation**, Netherlands.
- **Oak Foundation**, Switzerland.



The report made a number of recommendations to the European Commission, the European Parliament and the Council of the European Union, some of which are included in the Parliament's resolution of 4 April 2019. In this regard, PICUM welcomed the 'improvements' made by tweeting a reference to an EPIM report, also dated March 2019, which gave five main recommendations. In its 2018 annual report, PICUM also highlighted its success in influencing European funding programmes with ECRE in favour of migrant inclusion:



102. Given the close-knit nature of the NGO sector, it is perhaps unsurprising that the Sigrid Rausing Trust office is also home to Mabel van Oranje, who spent 11 years at the Open Society (director of the Brussels office from 1997 to 2003; director of international advocacy from 2003 to 2008). However, her LinkedIn profile is incomplete. Van Oranje is also a founder and executive director of the European Council on Foreign Relations, which was established at the instigation of Soros. Further information regarding her other positions can be found on her dedicated profile on the World Economic Forum website.

103. He has been a member since 2009, after 13 years with Amnesty International.

As is often the case in such matters, the lobbying is being carried out simultaneously by the same key actors. The EPIM's partner foundations include well-known names (this list is not exhaustive; there are 16 partner foundations). As of 18 May 2021, the president of the EPIM is Tim Parritt, who heads the Oak Foundation's international human rights programme (103).



The report's preamble includes special acknowledgements to five members of the Migration Policy Institute (MPI, including two from the Europe branch) for their advice and feedback, and to Giacomo Manca, Policy Officer for European Funding for Inclusion at ECRE-PICUM, for his feedback. As illustrated by his LinkedIn profile, there is a strong connection between European bodies and NGOs. Manca's professional background includes a five-month trainee position at the European Commission's Directorate-General for Communication in 2015, followed by a three-month role as a parliamentary assistant, with a focus on Civil Liberties and Justice and Home Affairs.

The comparison points between the NGOs' recommendations and the final legislative provisions can be presented as follows:

- **Article 3**, 'General objectives and methods of implementation': to ensure equal access and opportunities to the labour market, but also to social protection, integration, inclusion, non-discrimination, gender equality, the eradication of poverty (particularly child poverty), as well as access to basic services and a high level of health protection. PICUM & ECRE called for social services to be accessible to all 'regardless of migratory status' and without discrimination linked to residential status. In a slightly different form, EPIM's fourth demand makes similar requests.
- **Article 4**, 'Specific objectives', (viii): 'To promote the long-term socio-economic integration of third-country nationals [i.e. non-Europeans], including migrants'. We have highlighted in bold a proposal amended by the Parliament. The previous version did not mention the long-term, and referred to 'marginalised communities such as the Roma' (transferred to the next article) rather than to migrants.
- **Article 6**, 'Gender equality and equal opportunities, and non-discrimination'. Point 1 states that all programmes implemented via ESF+ must guarantee gender equality in their preparation, implementation, monitoring and evaluation. PICUM & ECRE had made similar recommendations, particularly with regard to the implementation, monitoring and evaluation of ESF+ programmes.

- **Article 7**, ‘Consistency and thematic focus

Point 1: The Member States and, if necessary, the Commission should strengthen synergy and ensure coordination, complementarity and consistency between ESF+ and the other funds. They should also optimise coordination mechanisms to simplify actions and procedures and ensure close cooperation to provide integrated approaches in particular. This is echoed in the first recommendation of the EPIM report.

Point 3: Member States will now have to allocate at least 27% of their ESF+ resources to social inclusion objectives, including the inclusion of third-country nationals. In their report (page 4), PICUM & ECRE called for 30%, but the version not amended by the Parliament stipulated 25%.

- **Article 8**, ‘Partnerships’, point 2: ‘Member States should allocate at least 2% of their resources to developing the skills of social partners and civil society organisations at national and European level in the form of training, networking, strengthening social dialogue, and activities undertaken jointly by the social partners. (104)’ These requests appear in the EPIM’s third recommendation, but they are almost word for word the requests of PICUM & ECRE:

- **Manage the fund and partnership with civil society and local authorities**
 - Support the participation of civil society organisations in the preparation, implementation, monitoring and evaluation of the actions implemented throughout the support of the fund, including meaningful instructions for a partnership principle in the regulation;
 - Promote the cooperation of managing authorities of different funds, for instance through the delegation of competences for delivering integration measures to the managing authority responsible for social inclusion policies (ministries of social affairs);
 - Support actions implemented by local and regional authorities or civil society organisations with the thematic facility strand through a specific earmarking.

- **Article 13**, 'Social innovation actions', point 1: Member States are required to provide support for social innovation and/or experimentation initiatives, with a particular emphasis on those that incorporate a socio-cultural element. To this end, they will establish partnerships with public authorities, social partners, social economy enterprises, the private sector and civil society.
- **Article 27**, ‘Eligible actions’, point 2.C.iv: for capacity building, this will include ‘national, regional and territorial contact points which provide advice, information and assistance related to the implementation of the programme’. The fifth EPIM recommendation argued that national and territorial actors were ‘well positioned to support the inclusion of migrants through ESF’.

104. Our emphasis.

105. A detailed version of Pew's proposals is also available in its dedicated report (44 pages).

Fishing and maritime affairs

As of 11 May 2021, The Pew Charitable Trusts had held 37 meetings with Commission officials, the vast majority of which focused on climate and oceans. The first meeting recorded since December 2014, on 4 December 2014, focused on the implementation of the reform of the Common Fisheries Policy, ocean governance and access to deep waters (for fishing stocks). However, this lobbying activity goes back further. An article by the Pew Charitable Trusts on 26 January 2012 was already entitled 'From the deepest abyss: transforming EU rules to protect deep waters', with 10 recommendations: (105)

Le Pew Environment Group recommande 10 réformes essentielles pour la gestion de la pêche d'eau profonde par l'UE. Ces réformes sont proposées sur base de rapport et communications de la Commission européenne, de règlements de l'UE, d'études scientifiques, des meilleures pratiques de gestion de la pêche, d'engagements internationaux pris par l'UE et de divers documents et analyses mis à la disposition du public.

1. Prévoir un mandat clair de gestion durable.
2. Éliminer progressivement l'utilisation de pratiques et d'engins de pêche destructeurs.
3. Exiger des évaluations d'impact préalables avant de pratiquer la pêche en eau profonde.
4. Instaurer la fermeture de zones lorsque des effets nocifs considérables sur les EMV sont avérés ou susceptibles de se produire.
5. Réglementer l'ensemble des opérations de pêche en eau profonde, à savoir la pêche en dessous de 400 m de profondeur, ainsi que la capture de toutes les espèces d'eau profonde.
6. Réglementer la capture même d'espèces d'eau profonde, et non leur simple débarquement.
7. Réduire les prises accessoires d'espèces d'eau profonde et mettre fin aux rejets.
8. Exiger que des plans de pêche plus détaillés soient remis préalablement à la pêche en eau profonde.
9. Gérer efficacement la capacité et l'effort de pêche dans les pêcheries d'eau profonde.
10. Améliorer les déclarations, la surveillance et le respect de la réglementation dans les pêcheries d'eau profonde.

A few months later, in a press release dated 19 July 2012, the European Commission presented new measures to improve the protection of deep-sea stocks and their habitats. This echoed several of the Pew Charitable Trusts' recommendations. On 8 June 2013, the BLOOM Association and the Deep Sea Conservation Coalition made a further plea, reiterating some of the Pew Charitable Trusts' proposals, specifically on deep-sea fishing:

NOUS DEMANDONS AUX DÉCIDEURS POLITIQUES DE L'UNION EUROPÉENNE DE TRANSFORMER LE RÈGLEMENT DE GESTION DE LA PÊCHE PROFONDE EN VISANT À :

1. Mettre fin aux pratiques de pêche destructrices par une élimination progressive et obligatoire du chalutage de fond et de la pêche au filet maillant de fond pour les espèces d'eau profonde en l'espace de deux ans ;
2. Exiger des études d'impact préalable pour toutes les pêcheries d'eau profonde ;
3. Garantir que la pêche soit uniquement autorisée si les captures, y compris les prises accessoires, peuvent être limitées à des niveaux durables sur la base d'une connaissance scientifique claire des espèces impactées, et en s'assurant que les pêcheries d'eau profonde soient gérées de sorte à minimiser ou éviter la capture d'espèces vulnérables, menacées ou en danger d'extinction ;
4. Garantir que l'ensemble des pêcheries d'eau profonde soient gérées de façon à prévenir les impacts négatifs sur les écosystèmes vulnérables d'eau profonde tels que les coraux, les éponges et les monts sous-marins.

The appeal was signed by 325 researchers and around a hundred members of NGOs. The largest number of NGO representatives - generally one or two members - came from the Pew Environment Group, with six members (106). Fishermen's associations were added, but there was some duplication with the NGOs mentioned above: 40+ Fishing Boat Association, Collectif Bar Européen, Fishing for Jobs, etc. A 'miscellaneous' section closes the list, with a few more duplicates, companies, freelancers and eight members of the World Bank.

Several of these proposals have been incorporated into Regulation (EU) No 1380/2013 of the European Parliament and of the Council on 11 December 2013 concerning the Common Fisheries Policy:

- 'Measures for the conservation and sustainable exploitation of the living resources of the sea may include, inter alia [...] pilot projects on other types of management techniques and on equipment which increase selectivity or reduce the negative impact of fishing activities on the marine environment' (Article 7, "Types of conservation measures"); 'Member States shall endeavour, within the fishing opportunities allocated to them, to provide incentives for fishing vessels deploying selective fishing gear or using fishing techniques which have a reduced impact on the environment, including low energy consumption and limited damage to habitats' (Article 17, 'Criteria for the allocation of fishing opportunities by Member States'): **point 2** of the Pew Charitable Trusts.
- Use impact assessments 'where appropriate' (Article 3, 'Principles of good governance'): **point 3**.
- Creation of 'biologically sensitive' protected areas where fishing activities may be restricted or prohibited. Within the framework of a multiannual plan, the Commission may 'be empowered to create such biologically sensitive protected areas' (Article 8, 'Establishment of fish stock recovery areas'): **point 4**. (107)
- Reducing unwanted catches and eliminating discards (Article 2, 'Objectives'; Article 10, 'Content of multiannual plans'; Article 16, 'Fishing opportunities'): point 7.

In 2016, the European Parliament, the Council of the EU and the Commission reached a consensus on a series of measures designed to improve the state of deep-sea fish stocks and to strengthen the protection of vulnerable marine ecosystems. Several of Pew's points are taken up:

- Trawling beyond 800 m is banned in the EU, and VME zones are closed to bottom fishing beyond 400 m: Pew's **point 5** regarding 400 m. The ban on trawling beyond 800 m has been a long-standing demand (since at least 2009) of the BLOOM Association and its president and founder Claire Nouvian, widely supported by Pew (see Yan Giron's work below). In a June 2016 memo, BLOOM states that 'these milestones were achieved thanks to BLOOM's vigorous public opinion campaigning in France, the UK and other EU Member States. Our entire public opinion campaign was devised and implemented hand in hand with the Deep Sea Conservation Coalition and The Pew Charitable Trusts'. A petition launched by BLOOM had also gathered 900,000 signatures. It is important not to misunderstand these three names as just three organisations. As of 11 May 2021, the Deep Sea Conservation Coalition actually had 91 members, including some of those mentioned in a footnote above, plus other influential members such as the WWF and Friends of the Earth (whose French section is known as Les Amis de la Terre).
- Specific application and control measures will be put in place: **point 10**.
- Fishermen must declare the number of sea sponges or corals they catch on the high seas and move to other fishing grounds when a certain quantity is reached. This is the fourth demand of the BLOOM & Deep Sea Conservation Coalition.

106. Here are just a few examples of these NGOs: Birdlife International, Conservation International, Fondation Nicolas Hulot, Greenpeace (France, and International - i. e. Greenpeace Stichtung, under Dutch law), Mission Blue, National Geographic Society, Oceana, Oceana in Europe, Seas At Risk, Sylvia Earle Alliance (Sylvia Earle is the founder and representative of Mission Blue, mentioned above), The Nature Conservancy.

107. The acronym VME used by Pew stands for Vulnerable Marine Ecosystem.



- A strengthened monitoring programme should make it possible to improve scientific understanding of deep waters. This is more or less an implementation of the third requirement of the BLOOM & DSCC, which is to limit catches 'on the basis of clear scientific knowledge of the species concerned'.

For more information on The Pew Charitable Trusts

This influence has been extensively documented by Yan Giron through a talk he gave at the Maison de la Mer in December 2014, his Blue Lobby website (now accessible via the Wayback Machine), and his Twitter account. In the most recent article published on the Blue Lobby website on 11 July 2014, Yan Giron outlined Pew's methods for influencing maritime issues, which rely on screen NGOs and win-win partnerships, in this case with the BLOOM Association, led by media personality Claire Nouvian:

"In its techniques for building mass movements, PEW creates coalitions of environmental NGOs, is able to set up its own subsidiaries which can then have their own façade of independence but still have the presence of PEW, or relies on external organisers to carry out its communications (Communications Inc)."

PEW's oceans and climate NGO subsidiaries:

- Seaweb, whose programmes include the Seafood Choice Alliance
- OCEANA
- PEW environment Group (still part of PEW)
- PEW center on Global Climate Change, now called the Center for Climate and Energy Solutions

(whose work on climate also affects the ocean component.)

PEW's major ocean programmes:

- Sea Around Us (scientific)
- The PEW Institute for Ocean Science devenu depuis the Institute for Ocean Conservation Science.
- All the Pew Environment Group's own campaigns

Ocean coalitions led, initiated and co-funded by PEW, with PEW providing administrative support and funding the communications delegated to Communications Inc:

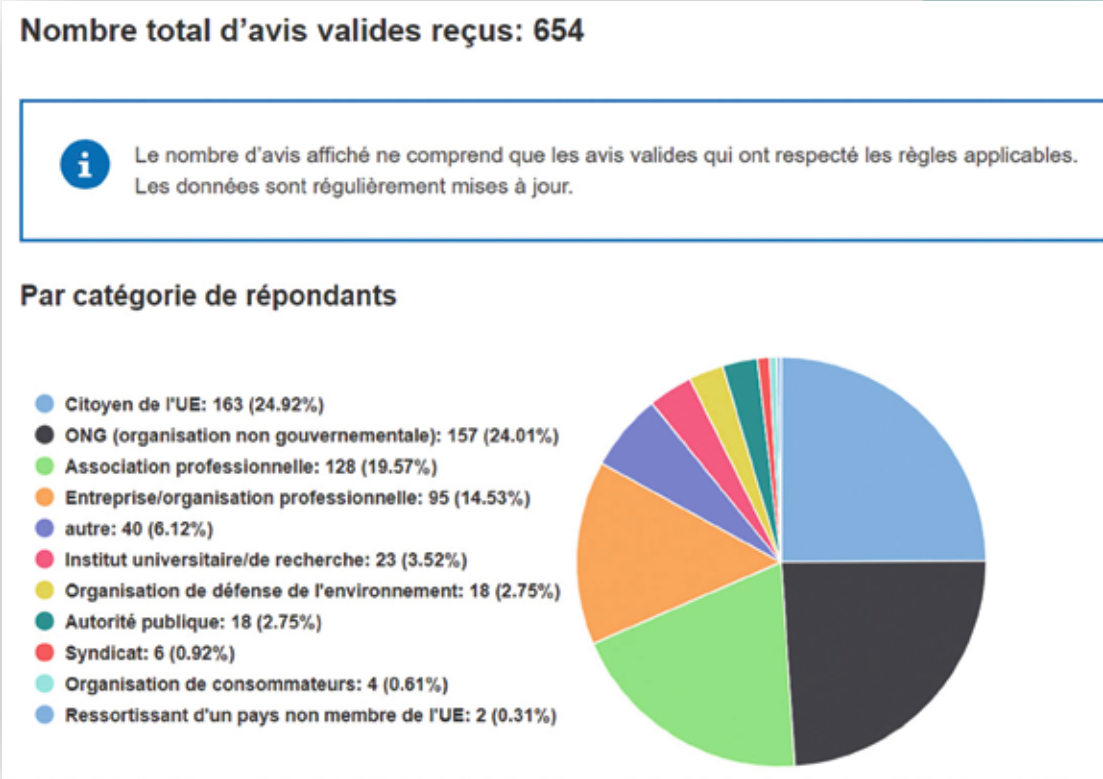
- Deep Sea Conservation Coalition
- OCEAN2012
- Shark Alliance
- Antarctic Ocean Alliance
- Alliance for the High Seas
- Global Ocean Commission

It is worth noting that Bloom is one of the few associations to be a member of the first 4 coalitions. The oceans are a major area of intervention and power for PEW, mobilising 1/3 of its financial resources (around US\$100 million per year)".

This is no more and no less than the methods used by NGOs and other systems of distributing grants (outside NGOs, for example, there are Rhodes scholarships in the academic world).

From Farm to Fork

The 'From Farm to Fork' strategy is part of the European Green Deal. The public consultation on this issue highlights the difficulty of assessing the real impact of each stakeholder's opinion. For example, the Commission received 654 valid submissions on its roadmap (108), each consisting of several recommendations:



The aim of this initiative is to develop a sustainable food strategy to meet the objectives of the European Union's Green Pact. It "defines the regulatory and non-regulatory measures needed to create more efficient and climate-resilient systems that provide healthy food while ensuring a fair standard of living for EU farmers and fishermen". It was adopted by the Commission on 20 May 2020.

It includes a number of points made by NGOs (109):

- Support for farmers, fishermen and others in the food chain who adopt sustainable practices: requests from the European Council of Young Farmers (ECYF).
- Empower consumers to make informed food choices: ECYF.
- Broadband access for rural communities: ECYF.
- A debate on new genomic techniques in the food chain: Food & Water Action Europe.
- Tackle the dangers of antibiotic resistance: mentioned by Food & Water Action Europe and an environmental coalition around Friends of the Earth Europe (FoEE).

108. Although the deadline for contribution was between 17 February and 20/03/2020, new submissions have been registered. In the space of an hour while these lines were being written, one new opinion has been validated, bringing the total number to 655.

109. It would require a thorough review to determine whether actors not mentioned here have made the same recommendations and/or whether the influence of the NGOs mentioned was sufficient.



- Change the food system and guarantee a neutral or positive impact on the climate: FoEE coalition.
- Shift to a system that operates within the limits of our planet and reduce the climate and environmental footprint of the European food system: FoEE coalition. The Commission uses several of the coalition's terms as they stand: 'planetary boundaries' and 'footprint' - on this point, the coalition uses the terms 'ecological and social footprint', while the Commission prefers the terms 'environmental and climate footprint'.
- Develop a nutrient management action plan to reduce pollution at source and increase the sustainability of the livestock sector: FoEE Coalition
- Reduce pesticide use by 50% by 2030: FoEE Coalition (which called for an 80% reduction).
- Take action to reduce food waste at all stages of the food supply chain: FoEE coalition.
- Monitor compliance with commitments on health and sustainability initiatives: FoEE coalition.
- Promote sustainable food consumption and facilitate the transition to healthy, sustainable diets (section 2.4): FoEE coalition.
- Monitor the implementation of the Unfair Trading Practices Directive: FoEE coalition.
- Include gender issues in cooperation with third countries: FoEE coalition.
- Ensure the welfare of farm animals: FoEE coalition.
- Simplify the registration of seed varieties: FoEE coalition (which wanted them to be registered in public registers)
- Assess food waste: FoEE coalition.
- Gradual switch to safe plant protection products: European Landowners' Organization (ELO), ClientEarth.
- A revision of the Directive on the Sustainable Use of Pesticides: ELO.
- Tackle overfishing: ClientEarth and the FoEE coalition.
- Foster sustainable practices in aquaculture: ClientEarth.
- Guarantee product labelling and traceability: ClientEarth.
- Replace single-use packaging and food utensils with reusable products: ClientEarth.

The Friends of the Earth Europe coalition

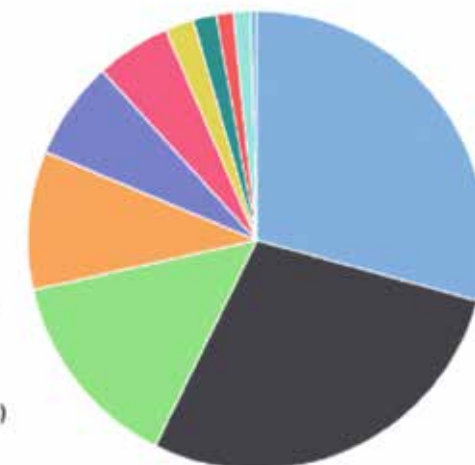


Sustainable and intelligent mobility strategy

The European Commission launched a public consultation on the issue between 1 July 2020 and 23 September 2020, receiving 246 responses, including 24 from NGOs. The legislation was adopted by the Commission on 9 December 2020. Several of the Commission's 'flagship initiatives' were included in the proposals put forward by the consulted NGOs:

Par catégorie de répondants

●	Entreprise/organisation professionnelle:	72 (29.27%)
●	Association professionnelle:	69 (28.05%)
●	Citoyen de l'UE:	35 (14.23%)
●	ONG (organisation non gouvernementale):	24 (9.76%)
●	Autorité publique:	17 (6.91%)
●	autre:	13 (5.28%)
●	Institut universitaire/de recherche:	5 (2.03%)
●	Organisation de défense de l'environnement:	4 (1.63%)
●	Syndicat:	3 (1.22%)
●	Organisation de consommateurs:	3 (1.22%)
●	Ressortissant d'un pays non membre de l'UE:	1 (0.41%)



110. EMTA is an NGO that represents the interests of public authorities and bodies. On the French side, the letter is signed by Valérie Péresse, President of the Île-de-France region, and Laurent Probst, CEO of Île-de-France Mobilités.

111. Eurocities presents itself here as a 'public authority'. However, it is registered in the Commission's Transparency Register as a category III body (i.e. an NGO). This is not the only error in this public consultation. EdEN (Equilibre des énergies) presented itself as an NGO, although it is registered in the Commission's Transparency Register as a category II entity.

- Promote the use of zero-emission vehicles, renewable and low-carbon fuels and related infrastructure: European Metropolitan Transport Authorities (EMTA (110)), European Public Health Alliance (EPHA).
- Amendment of weights and rules relating to the weights and dimensions of heavy commercial vehicles: Human Powered Vehicle Association (request for a reduction in the total weight of vehicles),
- Reduction of carbon footprint: Koło Ochrony Środowiska Lewicy Razem,
- Introduction of economic incentives for multimodal transport operations and infrastructure: Transport & Environment.
- Make mobility fair and just for all - including disabled people; build on the Just Transition Mechanism for this: European Disability Forum, Koło Ochrony Środowiska Lewicy Razem.
- Virtually all vehicles will be zero-emission by 2050: Eurocities.
- Deployment of infrastructure for alternative fuels: Eurocities. (111)
- Towards the abolition of tax exemptions for aviation and maritime fuels: Eurocities.
- Rely on MaaS (Mobility as a Service) to guarantee multimodality: Eurocities, International Association of Public Transport (UITP)
- Help cities to modernise their range of equipment, particularly for micromobility: Eurocities, UITP.
- Make the most of intelligent digital solutions and intelligent transport systems (ITS): Eurocities.
- Improve regulation on cybersecurity certification framework for automated vehicles: Eurocities.

- Revision of CO2 standards for cars, vans and heavy goods vehicles: Transport & Environment.
- Internalisation of external costs within the EU Emissions Trading Scheme (ETS): Transport & Environment.
- Following COVID-19, help the travel and tourism sectors to recover and become greener (112) : Transport & Environment.
- Fund the development of inland waterway infrastructure: European Barge Union– European IWT Platform
- SMEs need easier access to finance, particularly to renew their fleets and make other green and innovative investments: European Barge Union - European IWT Platform.
- Implementation of a new NAIADES (113) programme (i. e. NAIADES III) : European Barge Union - European IWT Platform.
- Stricter standards for air pollutant emissions: European Public Health Alliance.
- In its conclusions (point 109), the Commission states: ‘The end of the crisis caused by the COVID-19 pandemic should be used to speed up the decarbonisation and modernisation of the entire transport and mobility system, which will limit its negative effects on the environment and improve the safety and health of our fellow citizens. The dual ecological and digital transition should reshape the sector, redesign connectivity and boost the economy. The Commission recognises that this transformation - which must be socially equitable and fair - will not be easy and will require the full commitment and support of all transport stakeholders, as well as a substantial increase in growth-generating investment from both the public and private sectors.’ Emphasis added by the Commission. Implementation of European rules on noise generated by rail traffic: Deutsche Schienenhilfe.
- In a preliminary report dated 22 March 2021, the European Parliament welcomed the Commission's proposed strategy for intelligent and sustainable mobility, and ‘supports its ambition to achieve an efficient, competitive, digitalised and climate-neutral transport sector’.

112. Dans ses conclusions (point 109), la Commission précise : « La sortie de la crise provoquée par la pandémie de COVID-19 devrait être mise à profit pour accélérer la décarbonation et la modernisation de l'ensemble du système de transport et de mobilité, ce qui limitera les effets négatifs de celui-ci sur l'environnement et améliorera la sécurité et la santé de nos concitoyens. La double transition écologique et numérique devrait remodeler le secteur, redessiner la connectivité et redynamiser l'économie. La Commission reconnaît que cette transformation – qui doit être socialement équitable et juste – ne sera pas chose aisée et nécessitera l'engagement et le soutien sans faille de tous les acteurs des transports, ainsi qu'une augmentation substantielle des investissements générateurs de croissance provenant des secteurs public et privé. » Souligné par la Commission.

113. To help inland waterway transport ‘maintain a large part of its modal share’.

114. A residence permit for investment purposes.

115. PWYP then became the Extractive Industries Transparency Initiative (EITI).

What NGOs claim to have achieved

Annual reports are one of the best ways to determine whether NGOs have been able to influence the European institutions, and they sometimes provide a wealth of information on the subject.

Effective lobbying by Transparency International

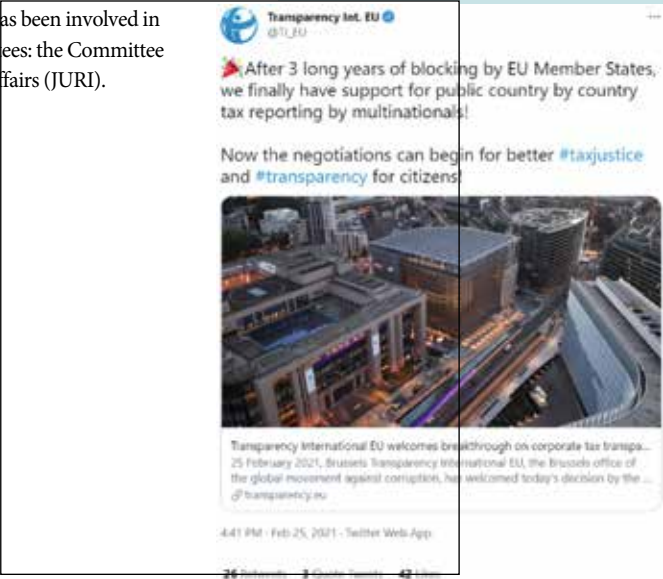
In its 2019 annual report, Transparency International announced several European victories:

1. Following our sustained lobbying and expert advice, the European Union adopted a directive on the protection of whistleblowers in October 2019. Many of our recommendations have been included in the adopted text'. The report goes on to say (p.15) that all the 'red lines' (key recommendations) have been addressed. TI welcomes this, pointing out that 'the law is stronger than anyone really expected'. As a result, the NGO stresses that all EU member states and candidate countries must incorporate the directive into national law by December 2021 at the latest, with TI monitoring the implementation process.
2. «We have ensured that the European Commission's Supranational Risk Audit Report identifies the Golden Visa industry (114) as a sector that raises risks of terrorist financing and money laundering to the European Union. This is now being monitored". To this end, the NGO has met with several European officials and published articles on the issue, including recommendations for political and institutional reform. Transparency International points out that this campaign was launched in 2018 with the NGO Global Witness. Open Society is the main funder of the latter, with more than US\$10.5 million allocated since 2016 (including US\$5.3 million in a single grant in 2018 for general support purposes). One of the directors and co-founders of Global Witness is also Simon Taylor, who 'launched the Publish What You Pay (PWYP) campaign in 2002 with George Soros and other NGOs including Transparency International UK [...]'. TI goes on to say that its work on Golden Visas follows on from investigations by its partner, the OCCRP, funded by the Open Society and other major organisations (Sigrid Rausing Trust, Ford Foundation, Rockefeller Brothers Fund, etc.). On the Golden Visa issue, TI said it had been selected to provide expert advice to the rapporteur of the European Economic and Social Committee (EESC), urging him and the Commission to take action. The EESC followed TI's recommendations.
3. TI's lobbying has helped raise transparency standards for the oil, gas and mining sectors. Working with a coalition of European NGOs coordinated by TI's European office, the NGO joined the European Commission in a review/revision process of current legislation. The coalition has also strengthened its collaboration with the business sector.

4. To integrate anti-corruption measures into European policy, TI's Brussels office has proposed a mechanism that would make funding to member states conditional on respecting and promoting the rule of law and good governance. The NGO says it has ensured that this proposal will be debated in the next European budget, 'and has included this policy recommendation in a European election pledge signed by all candidates'.

5. As part of the Commission's proposal on corporate tax transparency, TI has been involved in pushing the issue forward by working with members of the relevant committees: the Committee on Economic and Monetary Affairs (ECON) and the Committee on Legal Affairs (JURI).

This lobbying culminated in February 2021, under the Portuguese Presidency of the European Commission. In a press release dated 25 February 2021, Transparency International's European office 'welcomes the breakthrough on corporate tax transparency'. The press release states that the EU Council of Ministers has approved country-by-country reporting (CBCR) for multinational companies 'after years of deadlock'. The Commission proposed a preliminary draft directive to amend Directive 2013/34/EU in 2016, but it remained blocked for some time.



117. Point 16 of the French version of the Directive of 11/12/2018 refers to a 'renewable energy community'.

118. This concept dates back several years. It can be found, for example, on the Commission's website, in a summary report by the European Migration Forum dated 26-27/01/2015 on the management of migrant flows.

On 17 January 2018, Greenpeace reported that the European Parliament voted to increase the European Union's renewable energy share target to 35%, above the 27% decided by the European Union Council and Commission. At the same time, the European Parliament responded to the lobbying of the above-mentioned coalition of NGOs and others by 'strengthening the rules supporting citizens who produce renewable energy at home or in a cooperative (117)'. On 19 April 2018, Greenpeace and its coalition called on EU energy ministers to stop restricting people's ability to produce and share renewable energy. On 14 June 2018, Greenpeace reported that it had received partial satisfaction with a European permit for citizens to install solar panels on their roofs. On 13 November 2018, the NGO welcomed - at the same time as the Commission - the adoption by the European Parliament of "key provisions" of the "Clean Energy for All Europeans" programme. These provisions can be found in European Parliament and Council Directive (EU) 2018/2001 of 11 December 2018 on the promotion of the use of energy from renewable sources.

PICUM and migrants

Here are some examples taken from three annual reports:

• **2017 Annual Report:** PICUM promoted the concept of a 'firewall (118)' in favour of undocumented migrants' access to services and justice without interference from the authorities that would lead to their arrest or deportation.

Proposal for a Council Decision authorising the Commission to approve, on behalf of the Union, the Global Compact for Safe, Orderly and Regular Migration, in the field of immigration policy, 21 March 2018.

Objective 7, 'Address and mitigate vulnerabilities in migration', point 22 (g): '[...] establish security barriers [firewalls] between immigration officers and public services';

Objective 15, 'Provide access to basic social services for migrants', point 30 (c): '[...] establish security barriers between service providers and immigration officials'.

• **2016 Annual Report:** PICUM continued its high-level meetings with EU policymakers. The NGO met seven Commissioners during the year to defend migrants and present its recommendations, in particular to Frans Timmermans.

• **2014 Annual Report:** PICUM, in partnership with other NGOs, undertook a six-month project - summarised in a report published in March 2014 and funded by the Open Society Foundations and the European Commission - to promote European action to respond to 'criminalisation and violence against migrants in Greece'. The project included a hearing at the European Parliament on 20 March 2014: 'European migration policy: a 'rollback' of migrants' rights in Greece? Speakers included the Office of the United Nations High Commissioner for Refugees (UNHCR), the Office of the Council of Europe Commissioner for Human Rights, the EU Fundamental Rights Agency, the European Commission's Directorate General for Home Affairs and Justice, the Greek Presidency of the European Union, several Members of the European Parliament, as well as PICUM's Greek member organisations (and the Open Society Foundations, whose member Simon Cox opened the proceedings).

Citizens' rights on renewable energy

Among the successes claimed in its 2018 annual report, Greenpeace reports that, after three years of lobbying, it had succeeded in getting European law to recognise the role of citizens in the energy transition for the first time. The NGO points out that this campaign was led by a European coalition made up of several of its chapters, Friends of the Earth, REScoop.eu (116) (European Federation of Renewable Energy Cooperatives), consumer associations, municipalities and the solar industry.

On 26 September 2017, the most influential environmental NGOs met with Miguel Arias Cañete, then Commissioner for Climate Action and Energy, to discuss the European programme on clean energy, cars and vans, and the international agenda:

81	26/09/2017	Miguel Arias Cañete, Commissioner	Climate Action & Energy	Clean energy package, cars and vans, international agenda	WWF European Policy Programme (WWF ERC)
82	26/09/2017	Miguel Arias Cañete, Commissioner	Climate Action & Energy	Clean energy package, cars and vans, international agenda	Transport and Environment (European Federation for Transport and Environment) (EUE)
83	26/09/2017	Miguel Arias Cañete, Commissioner	Climate Action & Energy	Clean energy package, cars and vans, international agenda	Greenpeace European Unit
84	26/09/2017	Miguel Arias Cañete, Commissioner	Climate Action & Energy	Clean energy package, cars and vans, international agenda	Climate Action Network Europe (CAN Europe)
85	26/09/2017	Miguel Arias Cañete, Commissioner	Climate Action & Energy	Clean energy package, cars and vans, international agenda	Carbon Market Watch - Zentrum für Entwicklung & Umwelt (Carbon Market Watch)
86	26/09/2017	Miguel Arias Cañete, Commissioner	Climate Action & Energy	Clean energy package, cars and vans, international agenda	ACT Alliance Advocacy to the European Union (ACT Alliance EU)

116. REScoop.eu is a grouping of 1,900 European energy cooperatives, with a network of 635 structures (as of 27/04/2021). The NGO is a partner of the European Commission and receives funding from it. One of its two private funders is the European Climate Foundation, an NGO that acts as a front for business interests in the so-called 'clean' and renewable energy business. In 2015, for example, the ECF funded Friends of the Earth and - presumably - OXFAM for a report against EDF and ENGIE's coal-fired power plants, accused of 'warming the planet' - or how an NGO uses two supposedly environmental NGOs to push the energy agenda of big business.

Transport & Environment

We will take a few examples from two of the annual reports of this influential NGO, on which we will then go into some more detail.

2020 Annual Report:

- On 17 September 2020, the European Commission published its 2030 climate target plan. One section (pp.20-21) deals with CO2 emission standards for transport vehicles and foresees the end of internal combustion engine vehicles. In addition, the NGO reports that the Commission has announced a total of one million charging points for electric vehicles by 2025. T&E points out that this is one of its recommendations published earlier this year in its Recharge EU analysis. This element, however, is included in a document of recommendations issued by the European Commission as part of the Sustainable Transport Forum. But T&E is not cited in any of the Commission's many acknowledgements, only in two footnotes (notes 10 and 23), which the Commission relies on, among other sources. The main acknowledgements are for the Dutch TNO (Research Organisation for Applied Sciences, category IV entity) and POLIS (Networks of European Cities and Regions, category VI entity), both under contract to the European Commission. Other influential actors were the 37 public authorities surveyed by the Sustainable Transport Forum through a questionnaire.
- On 10 December 2020, the European Commission published a proposal for legislation concerning batteries and used vehicle batteries. In its annual report, T&E highlighted that this 'reflects T&E's priorities since the group joined the European Battery Alliance [an initiative of the European Commission and includes many members] in 2017'.
- On 8 July 2020, the European Commission published its Hydrogen Strategy for a Climate Neutral Europe. Aviation and freight transport are the two main sectors concerned, in line with suggestions made by T&E in a letter dated 5 February 2020. The Commission also notes that fuels derived from clean hydrogen (or green hydrogen) could achieve greater market penetration in a large number of sectors, a request also made by T&E. Finally, T&E insisted on the role of port infrastructures for hydrogen refuelling. The Commission took up this idea, pointing out that it was present in the Horizon 2020 Green Deal call. It is also included in the Commission's communication of 9 December 2020 on the strategy for intelligent and sustainable transport: Flagship Initiative 2: Creating Zero Emission Airports and Ports".

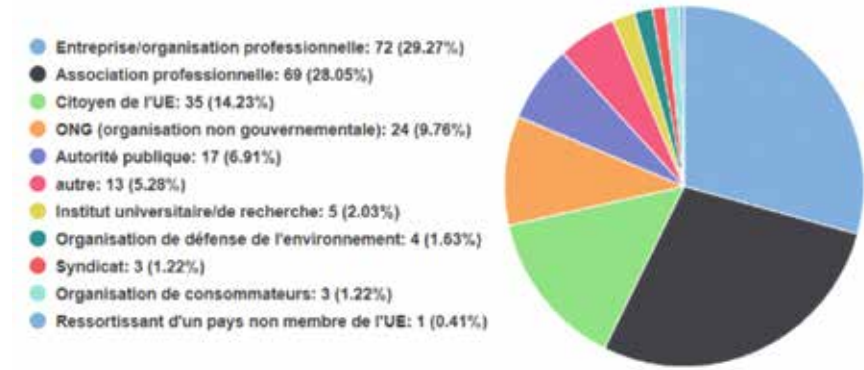
2019 Annual Report:

- In December 2019, the Commission included in its Green Deal agenda the idea of passing legislation to accelerate decarbonisation, particularly through the use of synthetic fuels ('e-fuel'), an idea that T&E claims to have pioneered.
- Where freight is concerned, the NGO reports that in December 2019, 'after years of dedicated campaigning by T&E, the von der Leyen Commission finally announced that the EU would come together to legislate on carbon emissions from freight'.
- Still on the subject of freight, the NGO wrote: 'After months of lobbying and intimidation by industry and the International Maritime Organisation, the European Commission has given in to T&E and others by proposing to largely retain its system [of publishing data on the CO2 emissions of all ships calling at European ports], which would strengthen the future climate measures T&E is calling for.'



- Finally, once again on the topic of freight: 'At T&E's insistence, President Ursula von der Leyen and climate chief Frans Timmermans have announced that the freight sector will start paying for its pollution via the EU Emissions Trading Scheme. T&E's recommendations for a zero-emissions berth standard - requiring ships to run on electricity while at berth - have also become a priority for the new Commission. The new Commission is also committed to 'accelerating the deployment of clean fuel infrastructure for ships - i.e. electric and hydrogen infrastructure'.
- In the energy sector, T&E announced that it had launched its "biggest campaign yet" with the help of its network to ban the use of palm oil-based biofuels. T&E coordinated the 'Not in my tank' coalition, which brings together NGOs from 15 European countries (including Friends of the Earth), in response to dissatisfaction with the draft legislation published by the European Commission on 8 February. This mobilisation of the coalition resulted in more than 68,500 responses to the Commission's public consultation on the issue, 97% of which were from citizens, according to the statistics provided. The delegated regulation adopted on 13 March 2019 vindicated the coalition.

Par catégorie de répondants



Is Transport & Environment a front for non-EU interests?

A study of the financial resources available to Transport & Environment (T&E) raises questions about the European dimension of the organisation and the interests that it really represents. The website gives details of its funders for 2018, the main ones being:

> 750 000 € : European Climate Foundation, The Norwegian Agency for Development Cooperation (NORAD), European Commission.
750 000 – 500 000 € : Schwab ⁽¹¹⁹⁾ Charitable Fund.
500 000 – 250 000 € : ClimateWorks Foundation, Oak Foundation.
250 000 – 100 000 € : Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, Federal Office for the Environment (Germany), KR Foundation, The Jennifer Altman Foundation.
100 000 – 25 000 € : Birdlife, Transport for London.

One thing to note about this funding is that the main sponsors of this influential NGO are from outside the EU (in green) or receive funding from sponsors from outside the EU (in yellow). For the bracket from €250,000 to > €750,000 :

¹¹⁹. This refers to the late Charles Schwab, not to a link with Klaus Schwab of the World Economic Forum.

European Climate Foundation	NORAD (Norway)	European Commission
Schwab Charitable Fund (USA)	ClimateWorks Foundation (USA)	Oak Foundation (Switzerland)

The majority of the European Climate Foundation's backers (120) are also from outside the EU (in green):

Arcadia Foundation (UK)	Bloomberg Philanthropies (USA)	Children's Investment Fund Foundation (UK)	ClimateWorks Foundation (USA)
Good Energies Foundation (Switzerland)	Hightide Foundation (USA)	IKEA Foundation (Netherlands)	Hewlett Foundation (USA)
Grantham Foundation (USA)	Growald Family Fund (USA)	KR Foundation (Danemark)	Nationale Postcode Loterij (Netherlands)
McCall MacBain Foundation (Switzerland)	Oak Foundation (Switzerland)	Stiftung Mercator (Switzerland)	Rockefeller Brothers Fund (USA)

¹²⁰. On 1 June 2021

The 2020 annual report provides an update on donors and amounts, including the following:

> 1 million € : Climate Imperative Foundation, European Climate Foundation, Schwab Charitable Fund.
500 000 < 1 million € : ClimateWorks Foundation,European Commission, NORAD, Oak Foundation.
500 000 – 250 000 € : Hewlett Foundation, KR Foundation, Rockefeller Brothers Fund.

Unknown, the Climate Imperative Foundation (USA) does not have a website. The most we can find is a page on the Open Corporates website, which gives a description. It is, in fact, an offshoot of Energy Innovation that takes the form of a limited liability company (LLC), a hybrid form of business that combines partnership and corporate structures.

The KR Foundation (Denmark) was established by Villum Fonden and works in cooperation with the Velux Foundation. KR is chaired by Connie Hedegaard, former European Commissioner for Climate Action (2010-2014), former UN Minister at the Copenhagen Climate Conference (2009), former Danish Minister for Climate and Energy (2007-2009) and former Danish Minister for the Environment. Among her many current roles in various companies, she sits on the boards of Danfoss (a global manufacturer of energy-saving components and solutions) and Nordex (wind power).
T&E is also supported by ten European organisations (including WWF France).

Nature-friendly agriculture

On 14 February 2019, as part of the CAP reform, MEPs from the European Parliament's ENVI group voted in favour of funding to protect the environment, nature and the climate. The European Environmental Bureau (EEB) welcomed the "historic vote", which echoes its demands for nature-friendly agriculture published in an NGO note on 6 September 2017.

Product repairability

The European Environmental Bureau and the Environmental Coalition on Standards (ECOS) launched the **Right to Repair** campaign, supported by a number of other organisations. The campaign called for:

- 1) eco-design for all products, including smartphones;
- 2) national registers for independent repairers;
- 3) A repairability index to inform consumers. On 15 January 2019, the EEB welcomed a decision resulting from the EU's Ecodesign Directive, which for the first time requires manufacturers to make their products easier to repair and last longer. In its 2019 annual report, EEB highlighted this as a major victory for the Right to Repair campaign.

Repairability index

In the same area, the EEB and ECOS are overseeing the Coolproducts campaign, which aims to achieve a better product policy. The campaign is supported by the European Climate Foundation and the European Commission's LIFE programme. In March 2019, the campaign led by the NGOs and its partners (see screenshot below) led to the return of the A to G ratings in the European energy efficiency labels, replacing the A+, A++ and A+++ labels. These new labels came into force on 1 March 2021 (see ‘European energy labels: rescaling and transition periods’) and apply to televisions, domestic appliances, electrical products, refrigerators, washing machines, etc.



Boosting Europe's climate ambitions by 2030

CAN Europe claimed the effectiveness of its network's sustained and repeated calls for a reduction in greenhouse gas emissions by 2030. The campaign became a focal point of the European elections, and CAN Europe's lobbying (through its Climate Action Call, signed by various public and private bodies) is said to have helped make climate a key issue in the elections. In October, political lobbying called on Climate Commissioner Frans Timmermans to set the reduction at -55% by 2030. The letter was signed by climate ministers from nine EU governments: Denmark, France, Latvia, Luxembourg, the Netherlands, Portugal, Spain and Sweden.

Climate neutrality by 2050

After EU governments abandoned long-term climate targets, CAN Europe lobbied the Council of the European Union to finally accept a climate-neutral target for 2050. At the same time, the Member States asked the Commission to prepare a long-term strategy for the EU on this issue.

Net neutrality: strengthening the right to a free and open Internet

This "neutrality", according to the NGO La Quadrature du Net, "is a fundamental principle of the Internet which guarantees that telecommunications operators do not discriminate against their users' communications, but remain simple transmitters of information. This principle allows all users, regardless of their resources, to access the same network in its entirety'.

In its 2020 annual report, the European Consumers' Organisation (BEUC) welcomed the fact that the Body of European Regulators for Electronic Communications (BEREC) (121) had taken on board many of its recommendations when it updated its guidelines on net neutrality. BEUC is a major NGO that won 1st place in meetings with the Commission during the Juncker mandate (144 meetings between 2014 and 2019), and receives subsidies from the European Union. Its published recommendations on net neutrality are the result of an operating grant awarded by the Commission via the European Union's Consumer Programme (2014-2020).

BEUC had published two response documents to BEREC's consultations, in 2018 and 2019. In the latter, BEUC issued new recommendations and thanked BEREC for taking into account, in several places, its 2018 recommendations. BEUC welcomes many of the approaches taken by BEREC:

- Paragraph 12 on definitions.
- Paragraphs 78 and 78a on routing management.
- Paragraphs 34 to 34c on quality of service (particularly in relation to 5G).
- Paragraph 37 on the fundamental principles of net neutrality.
- The directives on price discrimination.
- Paragraph 42, amended, on closed or non-open free subscriptions.
- Paragraph 42e, which provides better guidance on the fairness of the terms of free subscription schemes.
- The Annex where BEREC provides additional information on free subscriptions and similar offers.
- Paragraph 115, amended, concerning VPNs.

- Paragraph 121a on future measurement tools and methodologies for measuring the overall quality of Internet access services.
- Paragraph 135, amended, on the information that must be provided on how routing management may have an impact on the quality of Internet access services and on the confidentiality and protection of end-users' personal data.
- Paragraphs 141 to 141b on the rules applicable to hybrid access services and fixed wireless access services.

Tax havens

In March 2019, OXFAM published the 'Off the hook' report, subtitled 'How the European Union is preparing to whitewash the world's worst tax havens'. In its 2019 annual report, the NGO points out that, just three weeks after its publication, the European Parliament 'agreed for the first time that the European Commission should recognise five EU countries as tax havens (the Netherlands, Ireland, Malta, Cyprus and Luxembourg)', citing the report by name.

121. Body of European Regulators for Electronic Communications (BEREC).



Expertise that is recognised by the European Commission

The Transparency International example

Transparency International EU had an overall budget of €1.24 million for its 2019 financial year. Its private funding comes in particular from the Open Society and the Adessium Foundation. On the public side, the European Commission provides support through several of its Directorates-General: International Cooperation and Development (EuropeAid), Regional and Urban Policy, and Migration and Home Affairs. For the current period, its backers remain the same, with a budget of around €1.07 million:

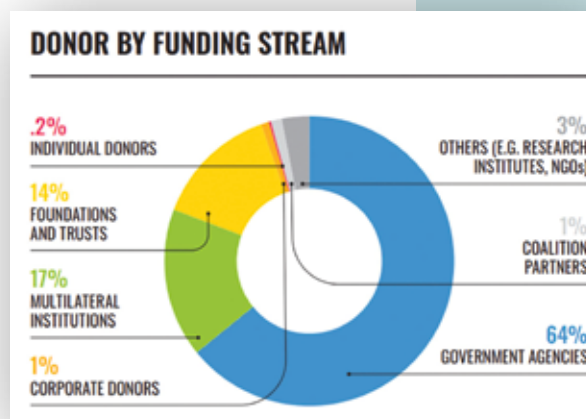
Transparency International EU's 2021 budget is around 1.07 mln euros. Our work is currently supported by the following grants:

- **Transparency International Secretariat** (100,000 EUR for core support in 2021 // 23,000 EUR for the Global Anti-Corruption Consortium in 2021)
- **Adessium Foundation** (450,000 EUR for core support in 2020-2022 // 150,000 EUR for the update of the EU Integrity Study in 2019-2020)
- **Sigrid Rausing Charitable Trust** (300,000 GBP for core support in 2018-2021)
- **Open Society Foundations** (300,000 USD for the work on asset recovery in 2019-2021 // 12,000 EUR for implementation of the whistleblowing directive in 2020-2021 // 30,000 USD for the work on an EU Ethics Body in 2021)
- **Directorate General Migration and Home Affairs** (178,479 EUR for the roll out of Integrity Watch tool in the EU in 2019-2021)
- **Directorate General for Regional and Urban Policy** (150,000 EUR for the Clean Contracts project in 2020-2021)

Globally, almost two-thirds (64%) of TI's funding comes from government sources:

On the same page, TI also states that it is a recipient of the Google Ad Grants award, whose programme 'distributes free advertising in favour of non-profit organisations'.

The NGO's European office has 48 registered staff (16 of whom work 100%), representing 25 full-time equivalents. Its stated aims and missions are to fight corruption and promote transparency - particularly with regard to whistleblowers.



Influence of NGOs on the European legislative process

In terms of targeted policies or legislative proposals at European level, TI claims to monitor all the political and legislative portfolios covered by its field of activity. These issues are particularly numerous, and TI has listed them as follows for 2020:

- Codes of Conduct in all EU Institutions
- EU Ethics body
- Inter-Institutional Agreement for a mandatory transparency register
- Transparency in the Council
- Transparency of the legislative process, including trilogues
- Anti-corruption in the European Semester
- Anti-Money Laundering (supervisory / regulatory regime)
- EU global human rights sanction regime
- Directive on asset freezing and confiscation
- Directive on the reuse of public sector information
- EU Supranational Risk Assessment
- Citizenship- and Residence-by-investment schemes
- Accounting Directive for public Country-by-Country reporting
- Discharge reports for main EU Institutions
- EU Budget Transparency and Accountability
- Protection of the EU's financial interests
- revision of the MFF

- MFF contingency Plan 2020 for EU funded programmes
- Revision of CRP for EU coronavirus response funding
- EU Public Procurement and Cohesion Policy as part of future emergencies responses
- Open Government & Open Data
- Fundamental Rights Report
- Rule of Law and conditionality for EU funding
- European Public Prosecutor
- Directive on fight against fraud by means of criminal law (PIF)
- The work of the anti-corruption agenda OLAF
- EU staff regulation & whistleblower protection
- Financial Regulation conflict of interest provisions
- EU Whistleblower protection directive
- EU Structural Funds, and Cohesion Regional Policy (including Integrity Pacts)
- Safeguarding EU funds in Public procurement in EU funds
- EU extractive industries transparency laws (Accounting and Transparency Directives)
- EC's Sustainable Finance Action Plan
- European Democracy Action Plan

- Review of the Non-Financial Reporting Directive
- Corporate due diligence mechanism
- Enlargement policies and progress reports
- European Neighbourhood policy
- European Development policy + financing
- Implementation of Sustainable Development Goals
- European Parliament Rules of Procedure
- Council Priorities in the area of anti-corruption
- European Elections (including questions of funding)
- Common Foreign and Security Policy, especially EU missions and security assistance
- Transparency and accountability of Eurozone governance institutions, especially ECB, EIB, ESM and Eurogroup



Given the time we have invested in our own research into the Soros universe, we can safely say that Transparency International is one of the organisations closest to George Soros. An inner circle, so to speak, with an influence that is even more widely recognised this year, as TI has been named 'Best NGO of 2021' by Dober Partners, whose 'labelling' enables nominees in the various elective categories to gain recognition within the Brussels authorities.

Again, it should be noted that the current Open Society database is incomplete and only lists grants made up to 2016. However, between 2017 and 2019, the Open Society Foundations declared 37 donations to Transparency International, totalling more than €6 million, mainly to the European office and the NGO's parent company. Other examples illustrate the close links between TI and the Open Society. A look at Transparency International's audited reports shows, for TI's parent company alone, the continuing generosity of the Open Society since 1999. In this report, the oldest available on the website, the Hungarian Open Society was TI's largest donor, with a grant twice as large as the second largest donor, USAID.

INCOME FROM DONATIONS AND SUBSIDIES		DM	5,720,318.53
(31.12.1998: DM 3,906,456.54)			
Breakdown:			
	DM	DM	
Income from donations by third parties			
Open Society Institute, Hungary	1.493.738,97		
US Agency for International Development (USAID)	765.758,55		
MacArthur Foundation, USA	716.404,46		
Danish International Development Agency (DANIDA)	111.921,75		
Ministry of foreign affairs Finland (FINIDA)	164.375,70		
Ford Foundation, USA	248.321,53		
Volkart Foundation	672.383,77		
Swedish International Development Authority (SIDA)	158.700,21		
Canadian International Development Agency (CIDA)	173.111,35		
Dutch Government	238.995,60		
Other donations below DM 100,000	268.007,85	5.011.719,74	
Income from donations for the IACC		606.364,85	
Income from donations by associated entities			
TI - USA	97.324,34		
TI - Australia	4.909,60	102.233,94	
		5.720.318,53	

The TI Board includes several people with close ties to the Open Society: Ruben Lifuka (vice-chair), Nada Abdelsater Abusamra, Boris Divjak, Karen Hussmann, David Ondráčka. But two profiles are more relevant. Firstly, Peter Eigen, the founder of TI, is also a special representative of the Extractive Industries Transparency Initiative (EITI), which we have already mentioned as a creation of the Soros networks. Secondly, Kumi Naidoo, who was seen alongside George Soros at the Munich Security Conference on 7 February 2015, ran the NGO CIVICUS for ten years, which has been generously funded by Open Society with US\$2.35 million between 2016 and 2018 - spread over 6 grants - and other donations in the past. Naidoo has also sat on the board of the NGO 350.org, two of whose 'allies' are platforms of the Soros networks, best known for their political lobbying: Avaaz.org and MoveOn.org.



The silence of Transparency International on the tax avoidance practices of its financial backer, George Soros

This raises the question of the independence and therefore the consistency of Transparency International's statements and, above all, its silence. Before he was a philanthropist, George Soros was a financier. In addition to Soros Fund Management, which he founded in 1969, Soros and his partner at the time, Jim Rogers, set up the Quantum Fund in the same year. Quantum quickly attracted wealthy investors from around the world and was a benchmark for many years, allowing George Soros to develop his business contacts as well as his fortune.

The Quantum Group operates offshore, away from the scrutiny of the Securities and Exchange Commission, thanks to discreet incorporation in Curaçao (Dutch Caribbean) and the Cayman Islands. The SEC (Security Exchange Commission) Act of 1934 identifies and prohibits certain market practices.

Among other things, it requires investment fund managers to disclose information about themselves and to comply with anti-fraud legislation. Offshore status, however, makes it possible to avoid these obligations as long as the majority of shareholders - as was the case with Quantum - are not American. When asked about this domiciliation on 60 Minutes, Soros confirmed the freedom it gave him from SEC restrictions.

In 2011, after 42 years as a hedge fund, Soros Fund Management changed its status to a family office (122). This decision was in response to the introduction in 2010 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. One of its aims was to regulate publicly traded companies and their governance in the wake of the 2008 financial crisis. Family offices should logically have been included in this provision, but a lobby was formed to oppose it. The Private Investor Coalition, registered in the tax haven of Delaware, congratulated itself on having worked with the SEC in 2011 to develop the Family Office Rule.

Family offices were exempted from their SEC transparency obligations on 22 June 2011. Only a few weeks later, Soros' hedge fund became a family office. Transparency International remained silent and made no mention of this on its website.

122. The AFFO, the French family office association, defines this type of structure as 'an organisation of people at the service of one or more families, offering advice to families in the exclusive service of their patrimonial interests. The family office therefore presupposes the preservation of family coherence with a long-term, trans-generational vision. It requires broad, multi-disciplinary skills, developed in-house or externally, depending on the size of the estate and its degree of diversification or complexity', <http://affo.fr/le-FO.html>.

Influence and recognition by the European Commission



Transparency International is naturally very influential at the European level, given its extensive activities, its pioneering role in the field and its networks. In addition to its toolkits, recommendations, reports and other documents, TI publishes an annual Corruption Perceptions Index (CPI), which has an international reach, particularly in terms of media coverage. Its index also assesses perceptions of corruption within the European Union (see tweet on the left). The NGO's proposed assessment appears to be influential enough for the European Commission to adopt it. On 27 January 2020, for example, the Commission's website dedicated an article to the just-released CPI 2019, reporting on the results and lessons learned - without, incidentally, questioning the methodology used to create the index.

The CPI 2019 gave the European Union a good score, but noted disparities between its Member States and called on the European Commission to take more action against corruption.

One paragraph reveals Transparency International's considerable influence on European legislation in this area: 'In order to improve transparency in public procurement for projects financed by the European Union, the European Commission and Transparency International are currently promoting the use of Integrity Pacts for these projects. Integrity Pacts are legally binding agreements under which independent third parties oversee the public procurement process to ensure that it is carried out in an honest and transparent manner'. The Commission's page dedicated to the Integrity Pact provides additional information, including the fact that Transparency International was behind the concept, which it has actively promoted and supported, as well as its influence on the European Commission's initiatives in this area and the role assigned to TI:

The European Commission launched a pilot project in 2015/2016 entitled Integrity Pacts - Civilian Control Mechanism for Safeguarding EU Funds, which covers 17 EU-funded projects in 11 Member States with a total value of over €920 million. The pilot project is coordinated by the Transparency International office, which maintains a status report on each project. The aim of the pilot project is to assess the effectiveness of the Integrity Pacts in achieving their intended objectives of protecting procurement projects from corruption, fraud and other irregularities, and to identify best practices for future implementation.

The project was launched at an international conference organised by Transparency International with the support of the European Commission, held in Brussels on 5 May 2015. A mid-term review of the tool, published in November 2018, specifically referred to the need for political will and the value of implementing integrity pacts early in the pre-tender phase. The project was awarded the European Ombudsman's Award for Good Management 2019 in the category 'Excellence in Administrative Transparency'. The G20 has also recommended the use of Integrity Pacts in its 2019 Compendium of Best Practices for Promoting Integrity and Transparency in Infrastructure Development. (123) Finally, the European Court of Auditors hailed the Integrity Pacts tool as 'an innovative fraud prevention measure'. This 'civil control mechanism for safeguarding European funds' (ESIF), led by Transparency International, is financed from public funds by the European Commission:

123. As is customary on Wikipedia, the sources of information are cross-referenced. The European Commission's page on Integrity Pacts provides the same information. It also includes a box quoting a manager from the Slovenian chapter of Transparency International.



124. Emphasised by the European Economic and Social Committee (EESC).

Transparency International is frequently referenced in the work and communications of the European Commission, for instance (and not exhaustive):

- The EU Anti-Corruption Report (COM/2014/038 final) by the Commission to the Council and the European Parliament highlights Transparency International via its Corruption Perceptions Index or a reminder of an IT project co-funded by the EU ('a comparative analysis of the legal framework protecting whistleblowers in each EU Member State'). The Commission also states that it has 'used information produced by research projects co-financed by the European Union, such as the "National Integrity System" reports drawn up by Transparency International'.
- The European Commission's communication on the subject of corruption in the European Union (COM/2011/0308 final) references the Corruption Perceptions Index and national integrity systems.
- The Commission has published a chapter for each EU country studied (Ireland, Sweden, France, etc.) in its working paper, '2020 Rule of Law Report', SWD(2020) 306 final, 30 September 2020. The reference analytical resource used is Transparency International's Corruption Perceptions Index.
- The European Economic and Social Committee has issued its opinion regarding the proposal 'Addressing corruption in the European Union: Considering the perspectives of business and civil society' (initiative notice) (2016/C 013/11).

Point 4, 'Self-regulation: ethical codes of conduct on corruption, in particular bribery', paragraph 4.2: 'The main mechanisms and guidelines at international level, which define the principles that companies should adopt to avoid corruption, in particular bribery, and to promote ethical behaviour and transparency, are as follows: [...] - Transparency International's General Business Principles for Countering Bribery, etc.'; [...] - Transparency International's General Business Principles for Countering Bribery, etc.'

Point 5, 'Comments on concerns of business and civil society', sub-paragraph 5.8.1: 'The involvement of civil society, including business, business associations and social partners in anti-corruption efforts is important. In particular, it should aim to raise public awareness and provide guidance on how to prevent corruption, fraud and bribery. In this context, the behaviour of individual companies and authorities is of crucial importance. In addition, national-level forums, such as the OECD's National Contact Points and Transparency International's Advocacy and Legal Advice Centres (ALAC (124)), could also play an important role in anti-corruption efforts.'

Improving tools for the social inclusion and non-discrimination of Roma in the European Union: the Open Society and its networks

On 23 August 2010, George Soros published a press release from New York calling on France to halt its 'mass' expulsions of Roma, citing concerns that these actions might contravene French and European legislation. Additionally, Soros noted that in 2009, the European Union had formally agreed to allocate structural funds towards supporting housing for 'marginalised' minorities, with a specific emphasis on the Roma community.

According to Viviane Reding, then Vice-President of the European Commission, the European Commission's 2010 Communication on the Economic and Social Inclusion of Roma in Europe, adopted on 7 April 2010, committed the Commission to "improving the effectiveness of existing instruments and policies". The Commission entrusted the drafting of the Communication to two organisations, one of which was the European Roma Rights Centre, an NGO registered in the trans-parliamentary register. The Centre was founded by Open Society activists and lawyers, as the NGO points out in its background report.

Presenting the report, Viviane Reding emphasised its scope and influence on future legislation: 'The time is right to publish the results of this study because the situation of the Roma is high on the political agenda of the European Union and its Member States. This report provides a comprehensive analysis of what works and why. [I am confident that this report will contribute to the dissemination of good practice among all stakeholders, including decision-makers working on the social inclusion of Roma.' The report also highlights the 'influential role' played by the Open Society in redirecting Roma funding to the non-governmental sector.

Open Society's efforts to influence Roma inclusion, notably through the adoption in 2011 of an 'EU Framework Strategy on Equality, Inclusion and Participation of Roma', were highlighted in a December 2011 report by the European Network of Independent Experts on Social Inclusion, 'Promoting the social inclusion of Roma'. The report highlights the crucial role played by European institutions, the UN, the World Bank and the Open Society. The authors point to the Open Society's 'Making the Most of EU Funds for Roma' initiative. This initiative, as the Soros NGO later recalled (in May 2012), is a "means to link the objectives of the Decade for Roma Inclusion [driven by the Open Society] with European financial resources", in particular to strengthen activist and advocacy capacities to keep Roma inclusion high on political agendas at all levels.

As early as March 2011, Open Society highlighted this 'Making the Most' project and published a document setting out its seven common standards for a national Roma inclusion strategy. Shortly afterwards, on 5 April 2011, the European Commission published a communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. This was an 'EU Framework for National Roma Inclusion Strategies up to 2020'. It took up several proposals from the document published by the Open Society a month earlier and recommended approaches for Member States 'to develop national strategies for Roma inclusion':

- Cooperation between governments and civil society,
- Allocate funding, with a European top-up if necessary,
- Set an achievable budget for the EU's four Roma inclusion targets (access to education, employment, healthcare and housing),
- Include robust monitoring methods to assess the impact of Roma inclusion policies, as well as a review mechanism to allow the strategy to be adapted.
- Etc.

6. Monitoring

- Partners to the consultation process in drafting the strategy should be fully engaged with governments in monitoring government progress in implementing the national integration strategy. Annual reports about the strategy need to provide detailed information about partner involvement in the monitoring process.
- Governments, Roma communities, and civil society groups need to assess annual report findings on national integration strategy activities, impact, and monitoring and take these findings into account as governments amend or develop new integration strategies.
- Government produced annual reports on national strategy activities should have detailed information about progress toward integration targets, how progress is measured, how projects and activities are funded, and the strategy's impact to date.

- inclure des méthodes de suivi solides afin d'évaluer l'impact des actions d'intégration des Roms, ainsi qu'un mécanisme de révision permettant d'adapter la stratégie;

- être conçues, mises en œuvre et suivies dans le cadre d'une collaboration étroite et d'un dialogue permanent avec la société civile rom, les autorités régionales et locales;

The Commission document also states that 'Member States' national strategies should follow a targeted approach that actively contributes to the Common Basic Principles on Roma Inclusion', a call also made by Open Society in its above-mentioned briefing. George Soros played a key role in ensuring the continuity of this plan by attending the European Roma Summit in April 2010.

This is not the only event where George Soros has personally addressed the Roma issue. On 26-27 November 2013, the European Commission's European Platform against Poverty and Social Exclusion held its 3rd annual conference, opened by the Presidents of the Commission (Barroso) and the Council (Van Rompuy). Soros took part in the first of the event's three plenary sessions as chairman of the Open Society. The theme was 'Implementing social policies to reduce poverty and inequality'. Soros spoke alongside the President of the Social Platform, Michel Barnier (then Commissioner for the Internal Market and Services), and the Lithuanian Minister of Social Security and Labour. The content of Soros' speech was reported in tweets by Heather Grabbe, director of OSEPI since 2009. The billionaire said that Roma unemployment deprives the European labour market of the young workers it needs. This access to employment was vital for Roma inclusion, whose employability depended on access to education for Roma children. Soros called for an end to 'hostile stereotypes' against the Roma in order to tackle their problems of poverty and exclusion. A European Commission document provides a fuller summary of the discussions. Heather Roy, president of the NGO Social Platform, called for increased pressure on Member States through 'stronger recommendations' on social issues. In particular, Roy called for future European social policy to be based on more inclusive, collaborative and robust governance, 'with greater involvement of civil society' (i.e. NGOs).

Roy also called for a strategy on homelessness, stressing that vulnerable migrants should be considered 'a European priority'. Commissioner Andor responded by saying that the Social Investment Package would address the issue and call for new measures. In particular, Andor suggested that "this should be concretely integrated into the European Semester process through country-specific recommendations". The President of the Social Platform has also made it a priority to ensure that a European integration strategy to combat poverty is put in place. This plan is regularly on the European Commission's agenda. Soros mentioned the fragile construction of the social dimension of Economic and Monetary Union (EMU) and called on Member States to issue government bonds. Commissioner Andor replied that it was only a question of implementation, that the Commission was drawing up a framework with various instruments and that it was now up to the national and local level to do what was necessary. This lobbying continued even before the meetings were listed in the NGO Transparency Register (December 2014). On 15 May 2013, Heather Grabbe reported that she had met with Commissioners Viviane Reding (mentioned above) and László Andor (then European Commissioner for Employment, Social Affairs and Inclusion) to discuss ways to reduce discrimination and exclusion of Roma.

These are just some examples. Other examples of Open Society's influence on the European Union on Roma issues and the expertise it has acquired can be found in the 'Toolkit on Programming the Structural Funds for Roma Inclusion in 2014-20' developed by Open Society. This remains a reference in the Roma section of the European Commission's website.

Other NGOs are also taken into account and regularly approached by the European institutions. This is the case of Eurocities, whose projects are supported by the EU. In its 2019 annual report, Eurocities highlighted that "its report on Roma inclusion at local level will feed directly into the European strategy for Roma inclusion after 2020". The good practices of Eurocities members have also been used in the Council of Europe resolution on human rights and in a European Commission report¹²⁵.

Equal treatment and Islamophobia

These two related issues also reflect long-standing consultations. For example, a report from the Commission to the European Parliament and the Council on the application of Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin (Racial Equality Directive) and Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation (Employment Equality Directive). In addition to the Member States and various bodies (Fundamental Rights Agency, social partners, etc.), the Commission reported that it had consulted civil society. Here we find the names of most of the NGOs that are still consulted by the Commission today and that are well placed in the top 10 of Integrity Watch, which is enough to underline their influence and the fact that the Commission has taken their proposals into account. The NGOs cited for this text are the European Women's Lobby, the Platform of European Social NGOs (Social Platform), the European Network of Religion and Belief (ENORB), the European Network against Racism (ENAR), ILGA-Europe, AGE Platform Europe, the European Disability Forum (EDF), Open Society, Amnesty International and the European Roma Rights Centre (ERRC), the Platform for International Cooperation on Undocumented Migrants (PICUM) and the European Forum of Muslim Women (EFOMW; the latter is funded by Open Society). EFOMW, together with other NGOs, is particularly involved in the fight against Islamophobia. On 21 September 2016, on the occasion of the World Day against Islamophobia, EFOMW, ENAR and other organisations called on European decision-makers to take urgent action. EFOMW's influence on the Commission can be seen, for example, in its cooperation/partnership with the Office for Democratic Institutions and Human Rights (ODIHR) of the Organisation for Security and Cooperation in Europe (OSCE), for example in 2016. The ODIHR is the main body on which the European Commission relies for data, tools and resources to combat Islamophobia. The Commission also states that it acts on the basis of the results of studies carried out by civil society and international organisations (i.e. here, a note from the ODIHR referring to Equinet, whose annual report does not mention its donors, but which is funded by the European Union and the Open Society, among others). The Commission also states that it relies on recent surveys: its link refers to the work of the Pew Research Center, an American research centre based in Washington whose activities are funded by the influential Pew Charitable Trusts, which we have already discussed.

¹²⁵. The English edition has greater detail than the French edition.

Expert panels and other entities

N. B.: We won't go into too much detail in this section for one simple reason: expert panels are usually made up of several types of entities. It would therefore seem risky or biased to attribute the primacy of a decision to one or another organisation within the group. We will only look at our first example of a group (panel) (E03734) because half of it is made up of NGOs, but companies and Member States are absent. This leaves little room for doubt. In this example, we emphasise the logic of networks, as in the Integrity Watch Top 10, to put the composition of the panel and the ecosystem it represents into perspective.

Overview

The purpose of this register is to provide a transparent list of entities providing advice and expertise to the Commission, including:

- Developing legislative proposals and strategic initiatives,
- Drawing up delegated acts,
- Implementing EU legislation, policies and programmes,
- Where appropriate, the preparation of implementing acts at an early stage, before submission to the committee, in accordance with Regulation (EU) No 182/2011.

These bodies are the expert panels, but also other similar entities, 'i.e. consultative bodies established by the Community legislator and not by the Commission, which have a similar or identical role to the Commission's expert panels and are administered and financially managed by the Commission (125)'. Experts may also be called upon to carry out studies. The groups are made up of representatives from the public and private sectors and meet on several occasions. For each expert panel, the Register provides information on the Commission department that manages the group, its members, its mandate and its tasks. The Register also includes 'relevant documents' produced and discussed by the panels.

These panels can be of two types:

- Formal - introduced by a decision of the Commission
- Informal - set up by a Commission department with the agreement of the Commissioner and Vice-President responsible, as well as the General Secretariat.

As of May 7, 2021, there were 1,112 expert panels, having held a total of 5,615 meetings, of which the top 10 (126) were distributed as follows (127):

Topic	Number of meetings
Internal market	727
Customs	697
Research & innovation	600
Environment	581
Transport	580
Agriculture	481
Public health	394
Business	364
Justice & Home Affairs	348
Other	317

Members totalled 45,916, broken down as follows (128):

Type	Number
Type D	29 552
Type C	7812
Type E	4 411
Type A	3 159
Type B	982

- **Type A: les membres nommés à titre individuel**, qui agissent en toute indépendance et expriment des avis personnels.
- **Type B: les membres nommés pour représenter un intérêt commun** à plusieurs parties intéressées dans un domaine précis. Ces membres ne représentent pas des parties intéressées spécifiques, mais une orientation stratégique commune à plusieurs organisations de parties intéressées. Ils peuvent être proposés par les organisations de parties prenantes.
- **Type C: les organisations** au sens large du terme, telles que des entreprises, associations, ONG, syndicats, universités, instituts de recherche, cabinets d'avocats et sociétés de conseil.
- **Type D: les autorités des États membres** , au niveau local, régional et national.
- **Type E: d'autres entités publiques**, comme les autorités de pays non membres de l'UE (notamment de pays candidats), les organismes, bureaux et agences de l'UE et les organisations internationales.

Les membres de type B et C ne peuvent être nommés que s'ils sont inscrits dans le registre de transparence.

Les membres de type C, D et E nomment des représentants permanents ou des représentants sollicités de façon ponctuelle, en fonction de l'ordre du jour des réunions.

126. The complete list can be found in the appendix to our study.

127. Please note: Meetings can belong to several categories at the same time. The sum of meetings calculated for all categories combined is therefore 6,763, not 5,615.

128. This is a general overview. We will not go into detail, distinguishing between the status of members: alternate member; member; member/alternate/observer of a sub-group; observer.

129. For the full list, see appendix.

130. Civil Dialogue Groups (CDG) and Market Observatories.

131. The ECYF is the leader of the latter.

132. Its annual reports highlight its presence in the European institutions. The 2020 Activity Report, for example, features a foreword by Commissioner Janusz Wojciechowski and MEP Norbert Lins. The former thanked "ECYF for its contribution to our public consultation on the long-term vision for rural areas and hopes that all young farmers will be active partners in developing this vision". The second expressed his wish to "continue the fruitful cooperation with ECYF on [several] important issues": the Common Agricultural Policy, the Farm to Fork Strategy and the Biodiversity Strategy.

Influence of **NGOs** on the European legislative process

Their thematic breakdown is as follows for the first 11 results (129):

Panels	Number
Research & innovation	139
Justice & Home Affairs	95
Statistics	93
Internal market	92
Customs	88
Business	83
Environment	83
Transport	74
Other	65
Public health	59
Agriculture	58

An entity can of course be part of several panels. However, this is not always a factor in its influence and is not enough to consider an NGO influential. OSEPI, for example, belongs to a single group. A less high-profile NGO such as the European Council of Young Farmers (ECYF), founded in 1958 and made up of 33 member organisations, is part of 13 groups (22 sub-groups) of experts on agricultural issues, in which ECYF has a total of 69 seats (civil dialogue groups and market watchdogs (130)). Its 2020 budget for European lobbying purposes is between €300,000 and €399,999, and it has an overall budget for the same period of €366,887, of which €123,000 comes from the European Commission's Erasmus+ programme. The ECYF is also part of four European projects: AgriSafetyNet and FAR-MINFIN (131), funded by Erasmus+, and EUREKA and COCOREADO, Horizon 2020 projects (132).

- Expert panel on the views of migrants in the field of migration asylum and integration (E03734)**
- **DG in charge:** DG Migration and Home Affairs
 - **Policy area:** Justice and Social Affairs
 - **Type:** Informal and permanent group
 - **Publication in the register of expert panels:** 17 September 2020
 - **Mission:** Providing advice and expertise on migration, asylum and integration policies for migrants. "The active involvement of migrants, in particular asylum seekers and refugees, in the design and implementation of policies in this area is essential to make them more effective and better adapted to needs on the ground."
 - **Tasks:**
 - > Assist the Commission in the implementation of legislation, programmes and policies.
 - > Help the Commission prepare draft legislation and initiate policies.
 - **Activity report:** The group will advise the Commission on its overall strategy and specific initiatives in the policy areas of migration, asylum and integration. The group will meet at least twice a year.

Members

- **Total:** 24 members.
- **Type A** – members appointed in an individual capacity: 9.
- **Type B** – members appointed to represent a common interest: 3.
 - > One of the experts, a Syrian, is presented as a member of Asociación Kudwa, whose partners are themselves part of other networks. Its partner, New Women Connectors - for inclusion & social justice, is itself a partner of OXFAM, Open Society, EPIM, the European Cultural Foundation (133) and the Soros-influenced Women’s March.
 - > Another, a Greek, is employed by the Elliniko Foroum Prosfigon (i. e. the Greek Forum of Refugees), funded by the Open Society (134).
- **Type C** – organisations: 12, including 10 NGOs (135):
 - > Bundesverband Netzwerke von Migrantenorganisationen e.V (BV NeMo)
 - > European Network of Migrant Women (ENOMW), funded by the Open Society.European Council on Refugees & Exile (ECRE), funded by the EU, UNHCR, and NGOs: Open Society, Oak Foundation, Adessium Foundations, EPIM, Sigrid Rausing Trust, etc.
- > Generation 2.0 - Second Generation/ Institute for Rights, Equality and Diversity, funded by companies (including MasterCard, MercyCorps, Western Union, Odyssea) and NGOs (including Soros' Open Society and Solidarity Now, EEA Grants, International Rescue Committee, European Trade Union, Human Rights 360°- funded by the Open Society, EEA Grants, Rockefeller Foundation, Erasmus+, etc.).
- > Migrant Women Association Malta (MWAM). The association's skills book includes external authors and was funded by a political actor, the American Embassy in Malta.
- > Moniheli ry
- > Ocalenie Foundation, funded by the Open Society and its Polish branch (i.e. the Stefan Batory Foundation), BNP Paribas Foundation, the European Union, the United Nations and several Polish public authorities.
- > Platform for International Cooperation on Undocumented Migrants (PICUM), funded by the Open Society, the Oak Foundation, the Addesium Foundation, the European Programme for Integration and Migration (EPIM) and the Sigrid Rausing Trust. PICUM also receives funding from the European Employment and Social Innovation Programme (EaSI) 2014-2020.
- > Save the Children Europe, funded by the Open Society (UK, Federation Inc., and International branches) and in particular the Bill & Melinda Gates Foundation.
- > The European Region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA-Europe), funded by Open Society, Freedom House, the Sigrid Rausing Trust, the European Commission (for its website) and the Dutch government.
- > The other two organisations are not listed as NGOs within the group. However, they are Category III organisations for the purposes of the Transparency Register: Groupe SOS-Solidarités ASSFAM and the Italian National Union of Refugees and Exiles (UNIRE, made up of four associations including Associazione MOSAICO - Azioni per i Rifugiati, funded by the Open Society).

133. The European Cultural Foundation is itself funded by the Open Society and the Stiftung Mercator, and its partners in 2021 include the British Council, the European Union, the European Foundation Centre, etc.

134. Not to be confused with the Greek Forum of Migrants, which is also funded by the Open Society.

135. Reminder: type C covers organisations in the broadest sense of the term, such as companies, associations, NGOs, trade unions, universities, research institutes, law firms and consultancy firms.

136. Please note that these meetings are included in the pdf list of each organisation's meetings Transparency Register.

Using our summary table approach to illustrate which NGOs are funded by other influential NGOs - the Open Society but not only - we obtain the following result:

NEMO	ENOMW	ECRE	GENERATION 2.0
MWAM	Moniheli ry	Ocalenie Foundation	PICUM
Save the Children EU	ILGA-Europe	ASSFAM	UNIRE

This group has only recently been set up. As of 7 May 2021, three meetings have been held (agendas are available online) (136). The minutes of the first two meetings are available. The meetings were attended by Commissioner Ylva Johansson, who said at the first meeting that she wanted to "learn from their experience and expertise".

European high-level expert panel for fighting racism, xenophobia and other forms of intolerance (E03425)

This group was set up by the Commission on 13 May 2016 (and last updated on 9 November 2018).

- **DG in charge:** DG Justice and Consumer Affairs
- **Type:** informal and permanent
- **Mission:** 'Stimulate the exchange and dissemination of good practice between national authorities and tangible discussions on how to bridge existing gaps and better prevent and counter hate crime and hate speech. The High Level expert panel will also serve as a platform for related discussions on how to address the specificities of certain forms of intolerance, in particular in the light of the experience of civil society and local authorities.'
- **Tasks:** assists the Commission in preparing legislative proposals and policy initiatives. Coordination with Member States, exchange of views.

Members

- **Total:** 35 members.
- **Type C** – Organisations: 5 members.
- **Type D** – Member States: 27 members.
- **Type E** – Other public bodies: 3 members.

The 5 organisations are NGOs, which belong to the same nebula and receive funding from the Open Society, for example:

Amnesty International Europe	European Network Against Racism (ENAR)	Open Society European Policy Institute (OSEPI)
Social Platform	ILGA-Europe	

It seems risky to identify the contribution of each actor. We quote Commissioner Jourová on a page of the Commission's website dedicated to the panel: "The group has not only contributed to monitoring and making effective the commitments made by the ICT industry to curb the spread of hate speech on the Internet. It has also helped to develop basic guidelines on recording hate crime, practical guidance on training police and judges on hate crime, and on providing justice, protection and support to victims of hate crime - with more to come on improving the investigation and prosecution of hate crime. I hope that Member States will build on these achievements to ensure better implementation of EU and national law on their soil.

I intend to build on the important work of the group and take it to the next level in the fight against all forms of racism and intolerance in Europe."

eHealth Expert Panel (E02769)

This group (abbreviated eHSG) was published on the Register of Expert Panels on 23 March 2012. Its main mission is to "provide expertise and advice, contribute to policy development and implement communication in support of the digital transformation of health and breast care in the Digital Single Market". The group also promotes coordination and cooperation with stakeholders and serves as a forum to discuss and examine key issues of legislative or policy relevance in the field of eHealth and the implementation of the communication. Its role is to assist the Commission in the preparation of legislative proposals and policy initiatives.

The panel is made up exclusively of 40 type C organisations, including 16 NGOs:

- AGE Platform Europe (AGE)
- Allied for Startups asbl (AfS)
- Association of European Cancer Leagues (ECL)
- European Consumer Organisation (BEUC)
- Eurocarers (EuCa)
- EuroHealthNet
- European Disability Forum (EDF)
- European Federation of Nurses Associations (EFN)
- European Health Telematics Association (EHTEL)
- European Organisation for Rare Diseases (EURORDIS)
- European Patients' Forum (EPF)
- European Public Health Alliance (EPHA)
- European Regional and Local Health Authorities (EUREGHA)
- Health First Europe (HFE)
- IHE-EUROPE
- Reference Sites Collaborative Network (RSCN)

The term 'other organisations' also includes 5 other category III entities (i.e. NGOs):

- Association Internationale de la Mutualité (AIM)
- Avicenna Alliance
- European Hospital and Healthcare Federation (HOPE)
- European Public Health Association (EUPHA)
- European Social Insurance Platform AISBL (ESIP)

We need only look at the various information on this group to gauge the extent to which the Commission is listening to its recommendations. The 'Additional information' tab on the page dedicated to the expert panel reports that the group has been renewed twice::

- The panel held nine meetings between 20 March 2012 and 13 October 2014, each time in the presence of European Commissioners or their staff, according to the agendas and minutes of these meetings. A tenth meeting was held on 10 September 2015, when the panel was granted an extension of its mandate.

- Between 18 May 2016 and 26 April 2018, the renewed panel held five meetings.
- Renewed for a second time, the panel held two meetings between 13 September 2020 and 4 December 2020.

Furthermore, the European Commission's communication of 25 April 2018 on enabling the digital transformation of health and care in the Digital Single Market notes that "eHealth stakeholder groups have played an important role" in the evolution of the system.

Commission expert panel on climate change policy (E03590)

This group, which is informal and permanent, was included in the register of experts on 13/03/2018 under the auspices of the Directorate-General for Climate Action. The group has been very active and has held 47 meetings, mainly on the Union's register or the list of free allocation and carbon leakage rules. Its mission is to assist the DG 'in the implementation of its policies and the preparation of its delegated acts, in particular with regard to the legislation adopted to implement the Paris Agreements. The group may also assist the DG in the preparation of legislative proposals and policy initiatives and serve as a forum for coordination and exchange of views with Member States on climate change policy.' The tasks assigned to the panel are taken from its mission statement, but it is also specified that the group will "provide expertise to the Commission in the preparation of implementing measures, i.e. before the Commission submits these draft measures to the comitology committee".

The expert panel has 62 members.

- **Type C:** The majority, with 30 members. Most of them are economic and commercial associations, i.e. category II entities in the Transparency Register. Only five NGOs are part of the group, but not the least:
 - Carbon Market Watch
 - Climate Action Network EU
 - Transport & Environment
 - WWF European Policy Office
 - International Federation of Industrial Energy Consumers
- **Type D:** 27 Member State officials (type D).
- **Type E:** 5 members, including three non-EU countries: Iceland, Liechtenstein and Norway (the three countries that make up the NGO EEA Grants).

Appendices

Appendix I

Expert panels of the European Commission

Number of meetings by topic

Topics	Number of meetings
Internal market	727
Customs	697
Research & innovation	600
Environment	581
Transport	580
Agriculture	481
Public health	394
Business	364
Justice & Home Affairs	348
Other	317
Food safety	205
Education	196
Consumer protection	176
Taxation	152
Employment & Social Affairs	150
Climate	149
Information Society	147
Energy	137
Foreign trade	87
Culture	77
Administration	63
Fisheries & Maritime Affairs	60
Statistics	58
Regional policy	54
Human rights	49
Economic & Monetary Affairs	48
Youth	38
Fraud prevention	37
Training	34
Communication	28
Development	28
Sport	26
Civil defence	19
Nuclear safety	15
Foreign relations	8
Institutional affairs	7
Budget	7
Languages & Multi-lingualism	7
Expansion	4
Competition	2

Number of panels per topic

Panels	Number
Research & innovation	139
Justice & Home Affairs	95
Statistics	93
Internal market	92
Customs	88
Business	83
Environment	83
Transport	74
Other	65
Public health	59
Agriculture	58
Education	53
Employment & Social Affairs	53
Taxation	51
Energy	42
Information Society	40
Food safety	39
Consumer protection	33
Economic & Monetary Affairs	26
Fisheries & Maritime Affairs	23
Climate	22
Foreign trade	20
Development	17
Regional policy	16
Foreign relations	12
Human rights	11
Culture	9
Training	9
Civil defence	9
Administration	8
Competition	7
Fraud prevention	7
Youth	6
Languages & Multi-lingualism	6
Budget	5
Communication	5
Sport	5
Broadcasting	4
Foreign & Security Policy	4
Institutional affairs	3
Humanitarian aid	3
Expansion	3
Nuclear safety	3

Appendix II

Thematic breakdown of registered entities

Thematic breakdown of all entities

Topics	Registered entities
Environment	6 947
Research & innovation	6 455
Climate action	5 702
Business & Industry	5 342
Digital economy & society	5 280
Single market	4 962
Energy	4 789
Competition	4 550
Commerce	4 418
Consumers	4 197
Education & Training	4 146
Economy, finance and the euro	3 953
Public health	3 863
International Cooperation & Development	3 665
Employment & Social Affairs	3 663
Transportation	3 649
Taxation	3 407
Agriculture & rural development	3 186
Justice & fundamental rights	3 164
Trans-European networks	3 118
Food safety	3 073
Regional policy	2 991
Institutional affairs	2 787
Foreign relations	2 686
Communication	2 514
Youth	2 358
Culture	2 194
Culture & Media	2 193
Customs	2 117
Banking & Finance	2 082
Foreign Affairs & Security Policy	1 981
Budget	1 859
Borders & security	1 725
Maritime affairs & fisheries	1 690
Humanitarian aid & civil defence	1 553
Expansion	1 323
Migration & Asylum	983
Sport	961
Fight against fraud	936
European Neighbourhood Policy	898

Thematic breakdown of all registered NGOs

Topics	Registered NGOs
Environment	1 621
Education & Training	1 526
Research & innovation	1 493
Climate action	1 364
International Cooperation & Development	1 309
Justice & fundamental rights	1 229
Public health	1 223
Digital economy & society	1 115
Youth	1 079
Employment & Social Affairs	1 018
Agriculture & rural development	923
Energy	884
Regional policy	838
Consumers	795
Culture	757
Food safety	749
Humanitarian aid & civil defence	732
Foreign relations	730
Trans-European networks	719
Business & Industry	718
Communication	696
Commerce	658
Single market	635
Culture & Media	633
Economy, finance and the euro	604
Transportation	597
Foreign Affairs & Security Policy	582
Institutional affairs	557
Competition	508
Budget	466
Migration & Asylum	460
Maritime affairs & fisheries	459
Borders & security	446
Taxation	439
Expansion	367
Banking & Finance	343
European Neighbourhood Policy	327
Sport	269
Customs	214
Fight against fraud	164

Appendix II

Thematic breakdown of registered entities

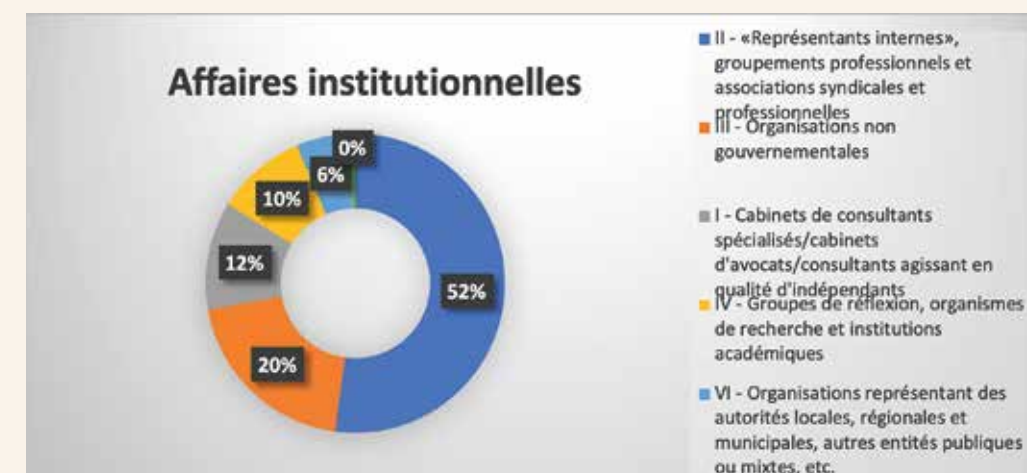
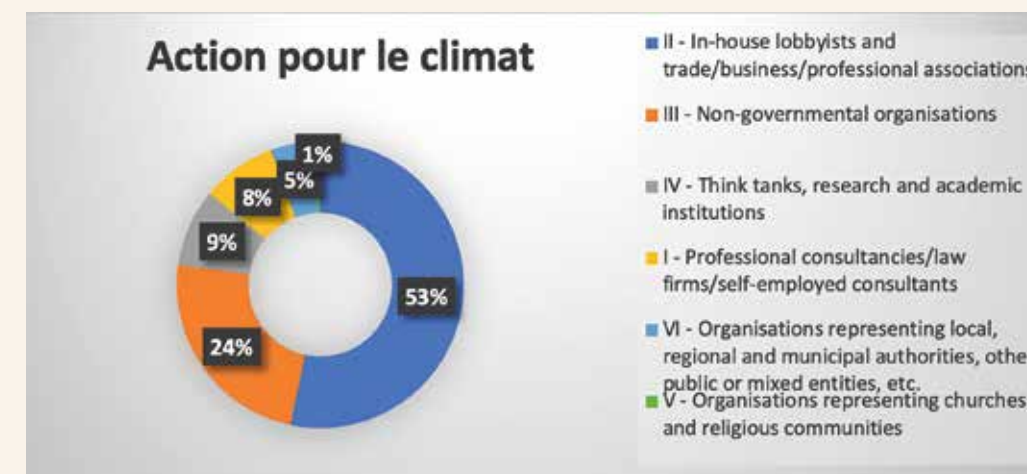
Breakdown of registered NGOs by topic (share of entities within each topic)

The yellow boxes highlight the topics where NGOs are the most numerous entities.

Topics	NGOs as % of total
Humanitarian aid & civil defence	47%
Migration & Asylum	47%
Youth	46%
Justice & fundamental rights	39%
Education & Training	37%
International cooperation & development	36%
European Neighbourhood Policy	36%
Culture	34%
Public health	32%
Foreign Affairs & Security Policy	29%
Agriculture & rural development	29%
Culture & Media	29%
Communication	28%
Expansion	28%
Employment & Social Affairs	28%
Regional policy	28%
Sport	28%
Maritime affairs & fisheries	27%
Foreign relations	27%
Borders & security	26%
Budget	25%
Food safety	25%
Climate action	24%
Environment	23%
Research & innovation	23%
Trans-European networks	23%
Digital economy & society	21%
Institutional affairs	20%
Consumers	19%
Energy	19%
Banking & Finance	17%
Fight against fraud	17%
Transportation	17%
Commerce	15%
Economy, finance and the euro	15%
Business & Industry	13%
Taxation	13%
Single market	13%
Competition	11%
Customs	10%

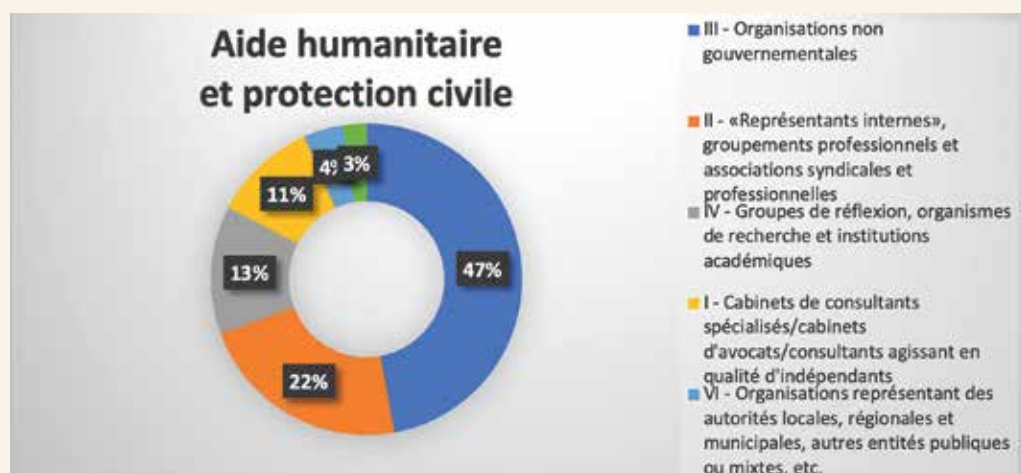
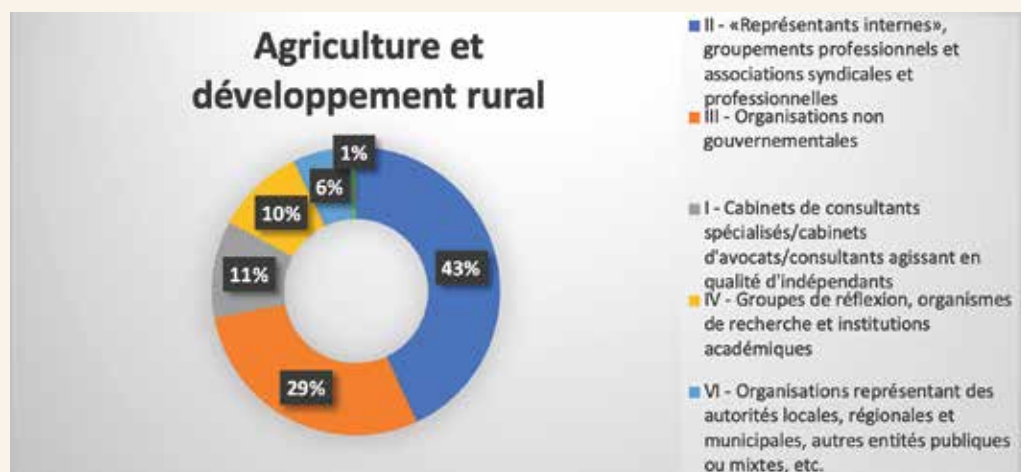
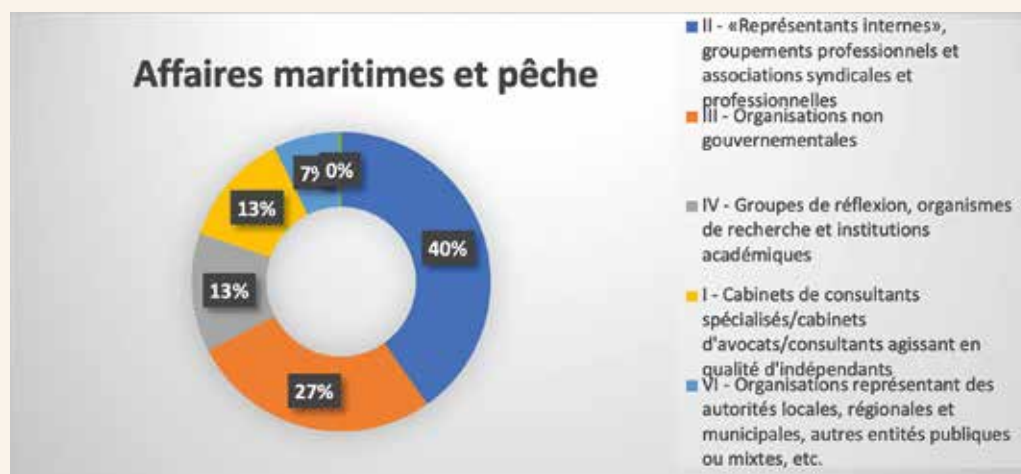
Appendix III

Detailed thematic breakdown of entities



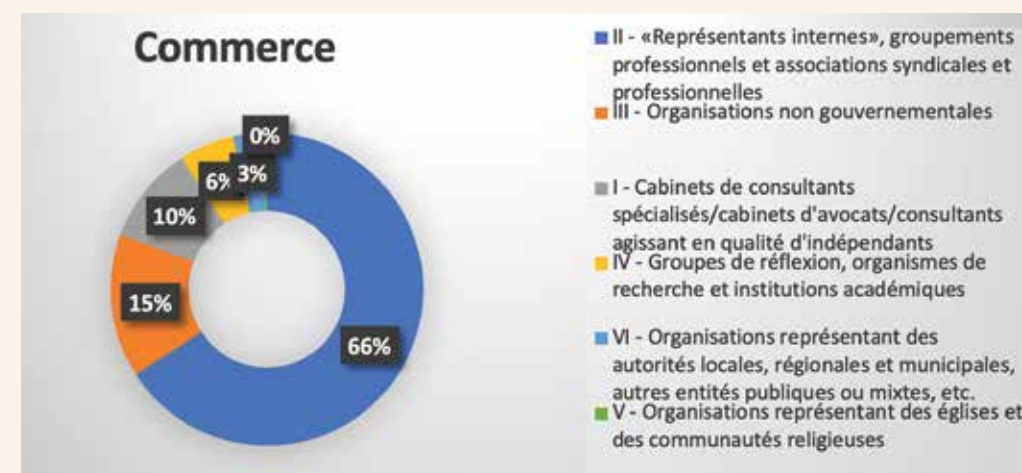
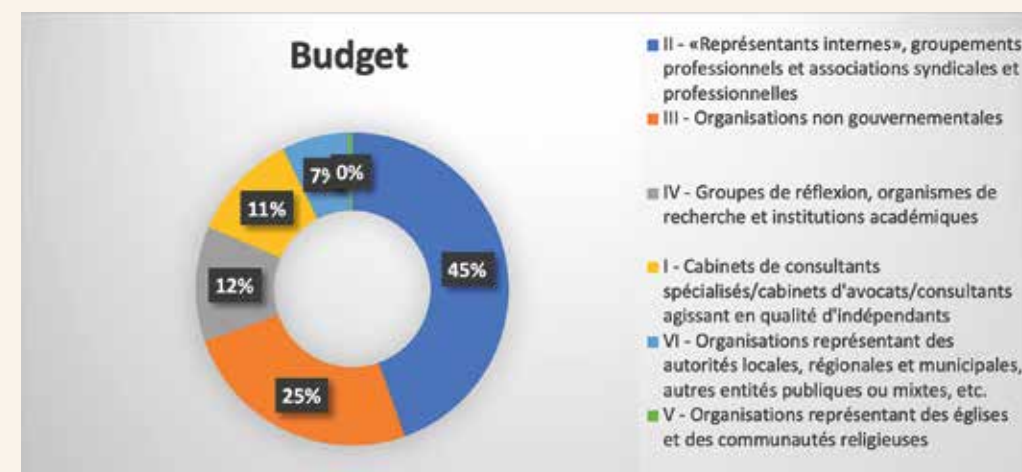
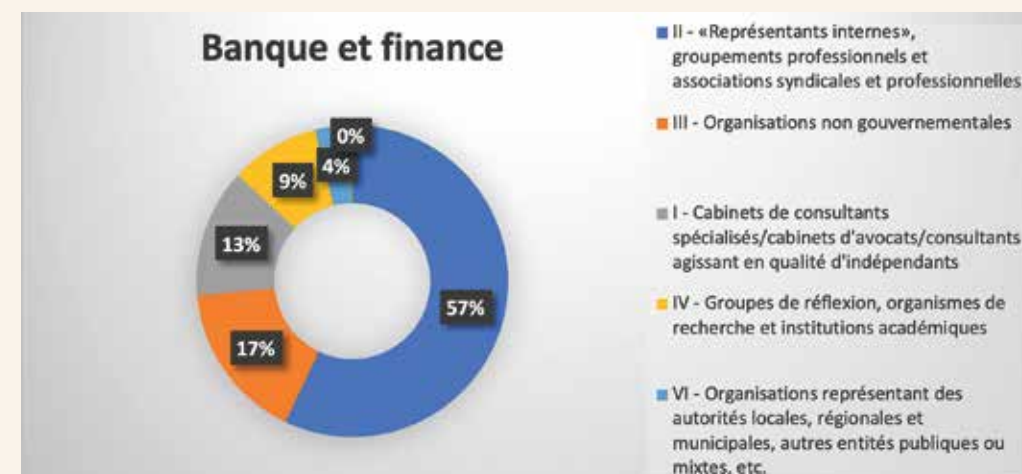
Appendix III

Detailed thematic breakdown of entities



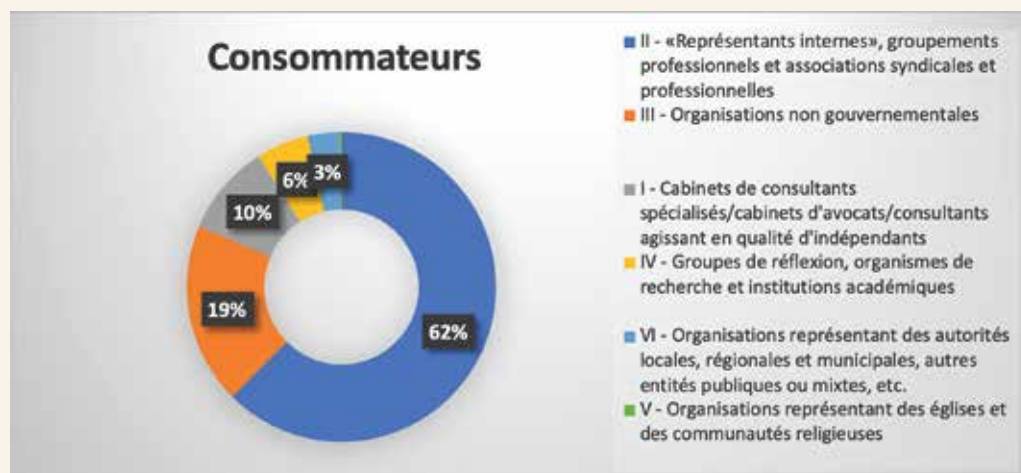
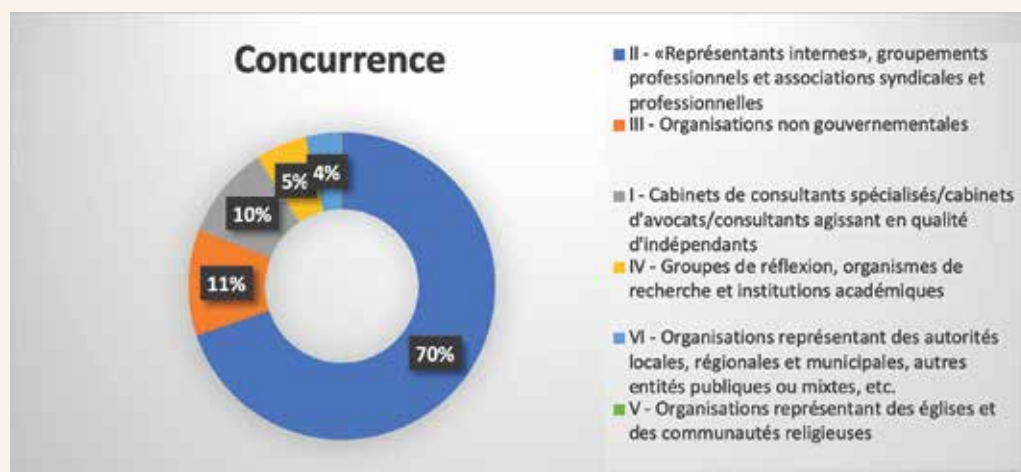
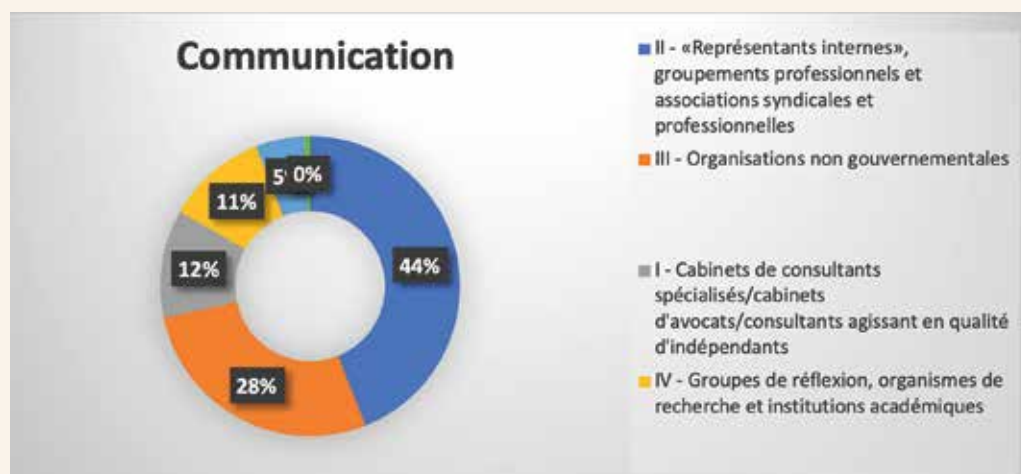
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Detailed thematic breakdown of entities



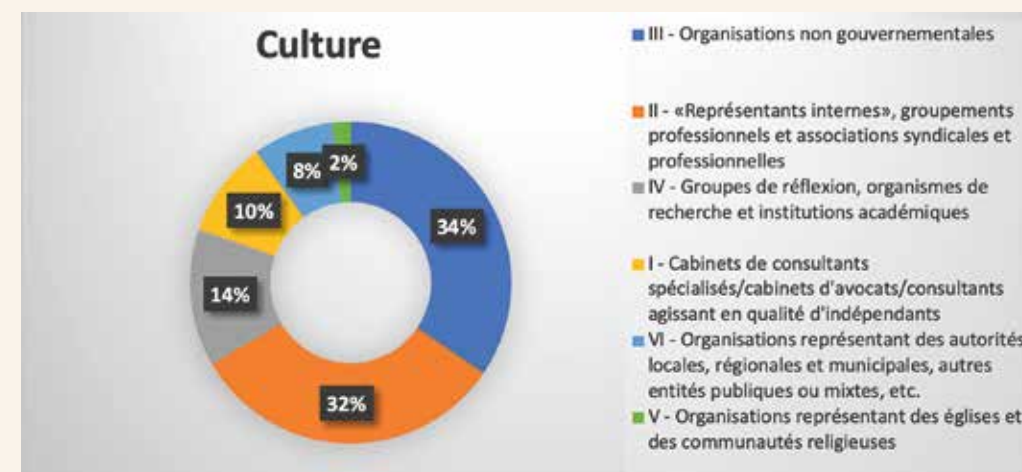
Appendix III

Detailed thematic breakdown of entities



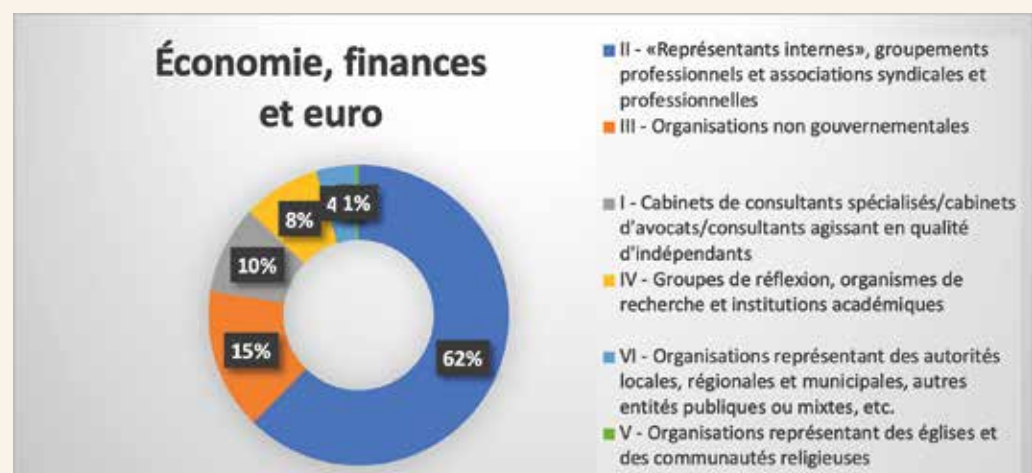
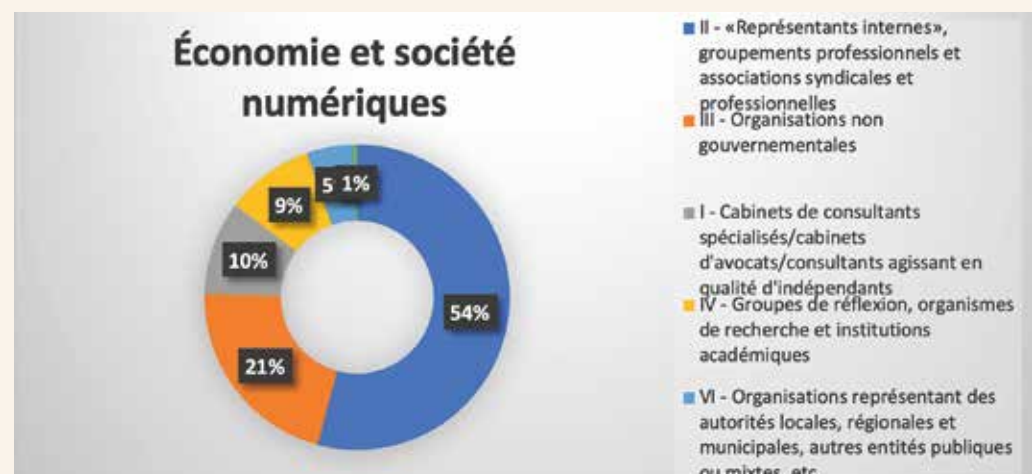
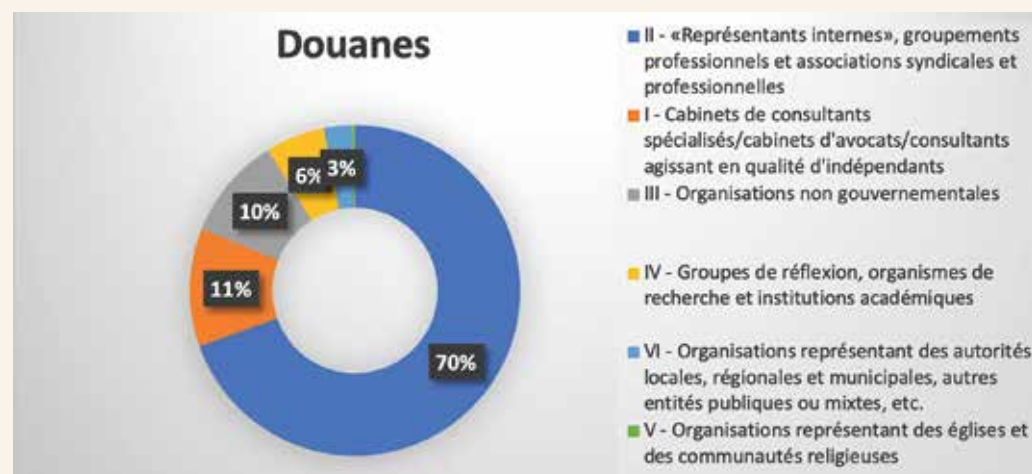
Appendix III

Detailed thematic breakdown of entities



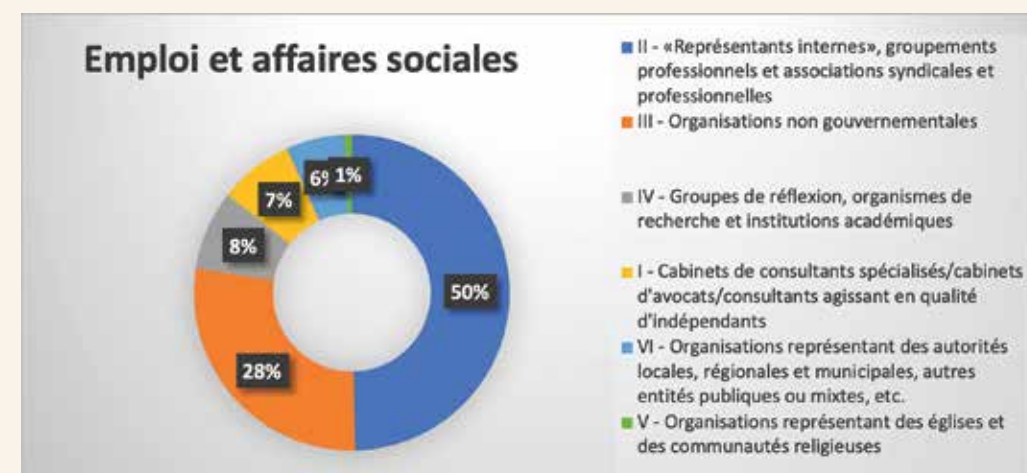
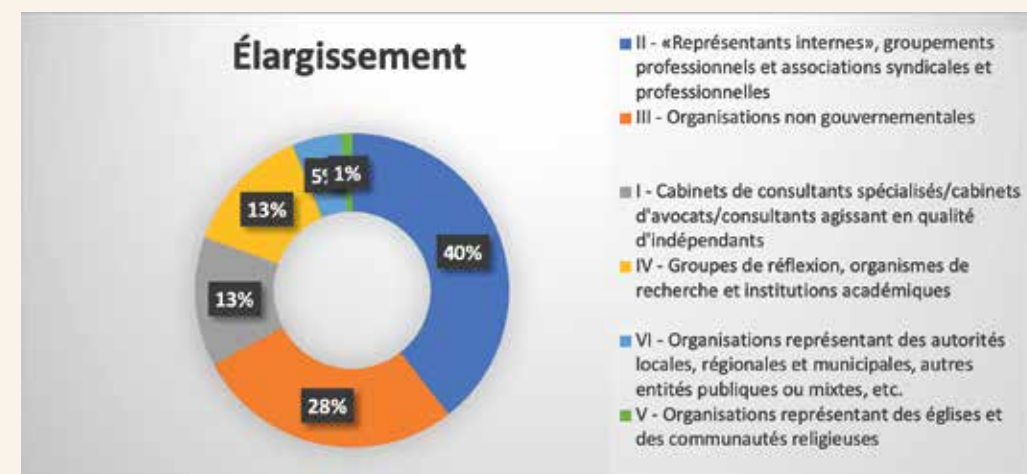
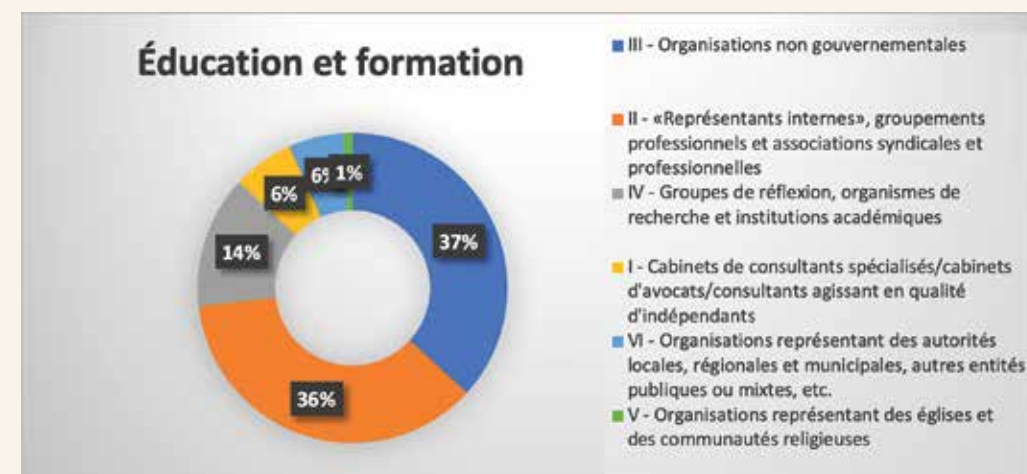
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Detailed thematic breakdown of entities



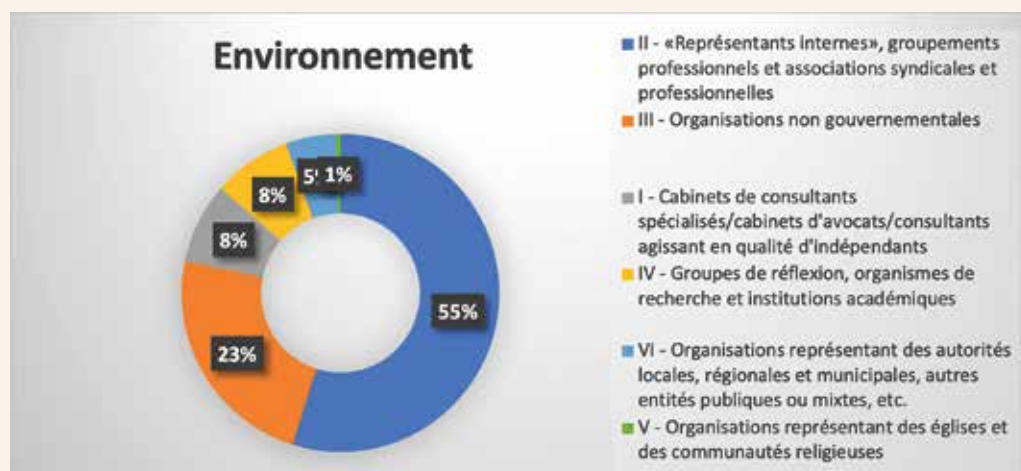
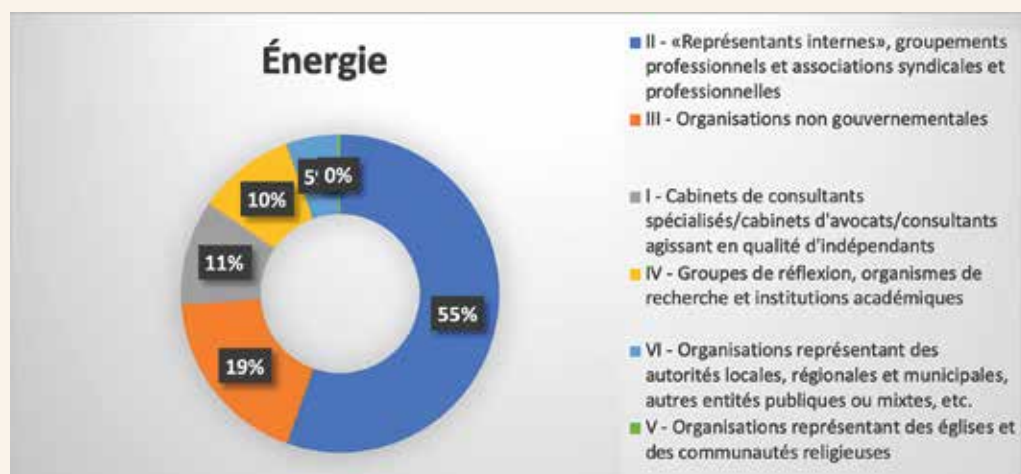
Appendix III

Detailed thematic breakdown of entities



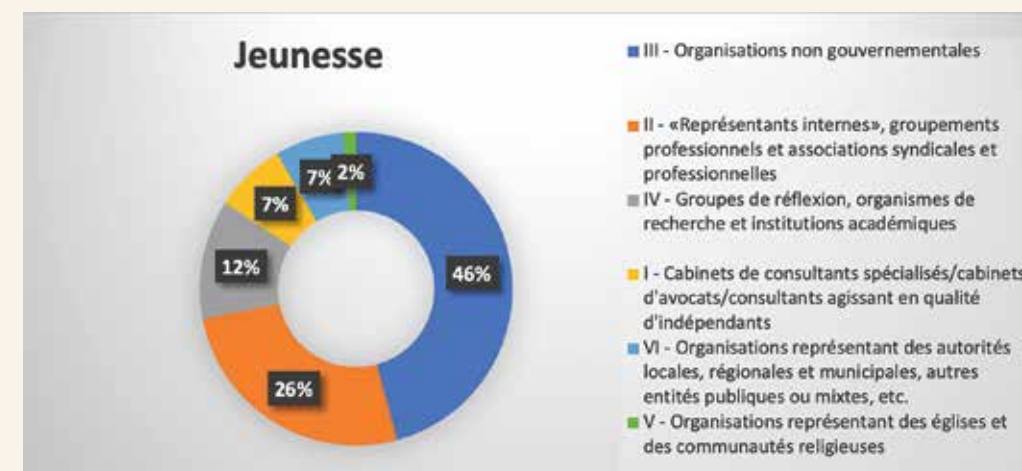
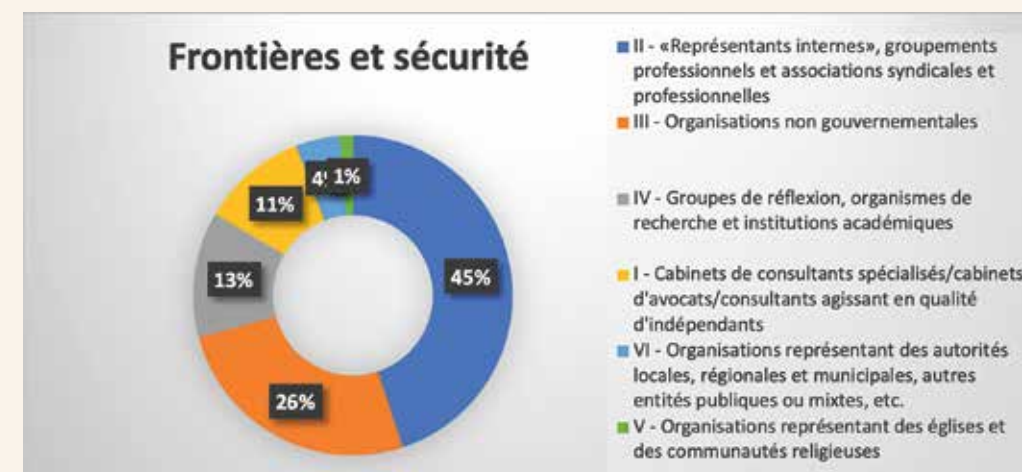
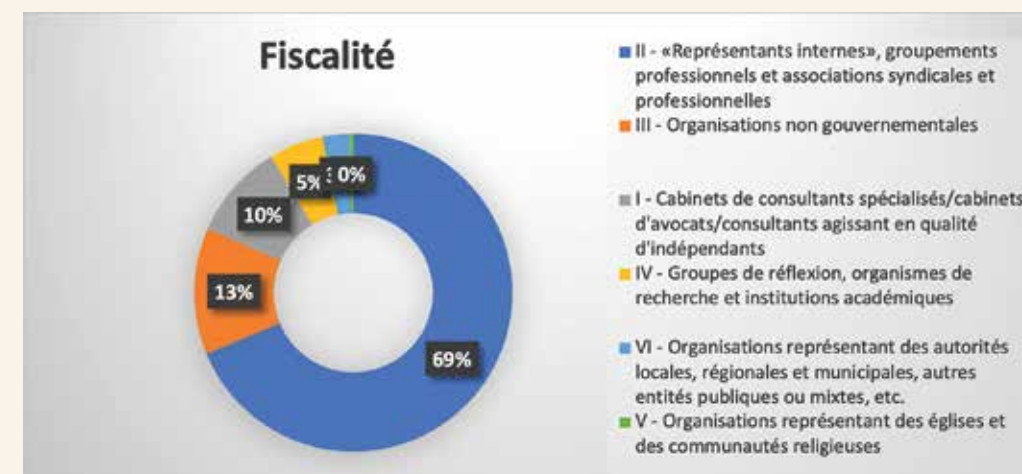
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Detailed thematic breakdown of entities



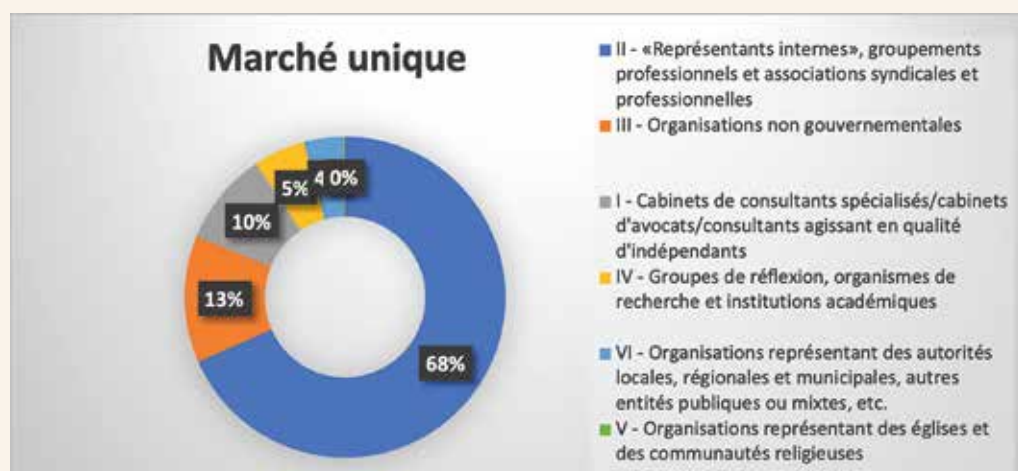
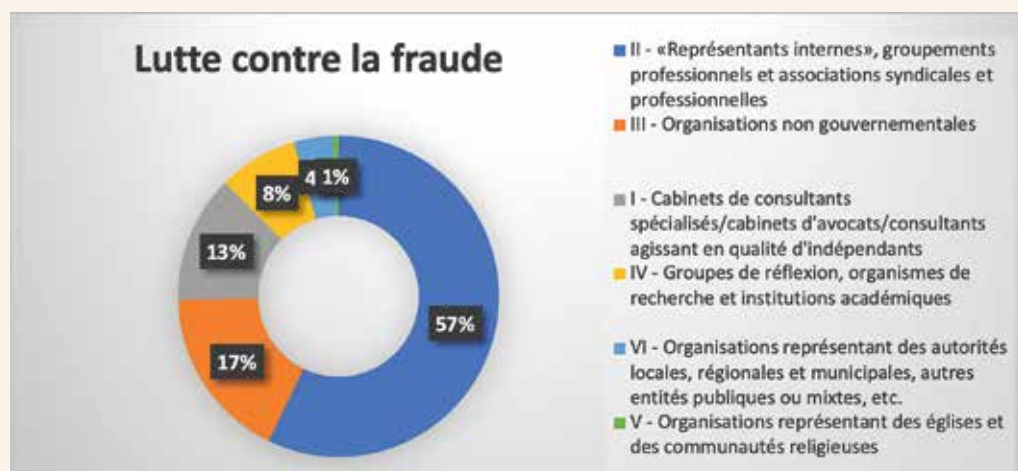
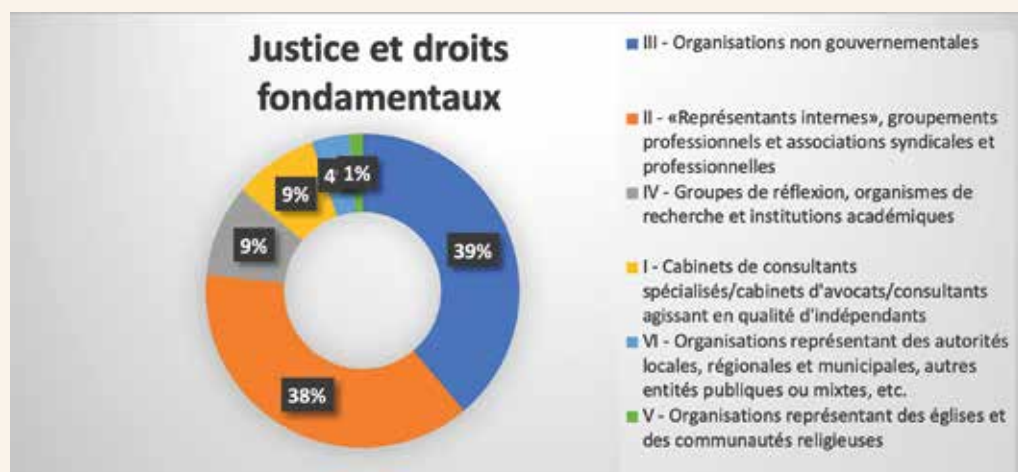
Appendix III

Detailed thematic breakdown of entities



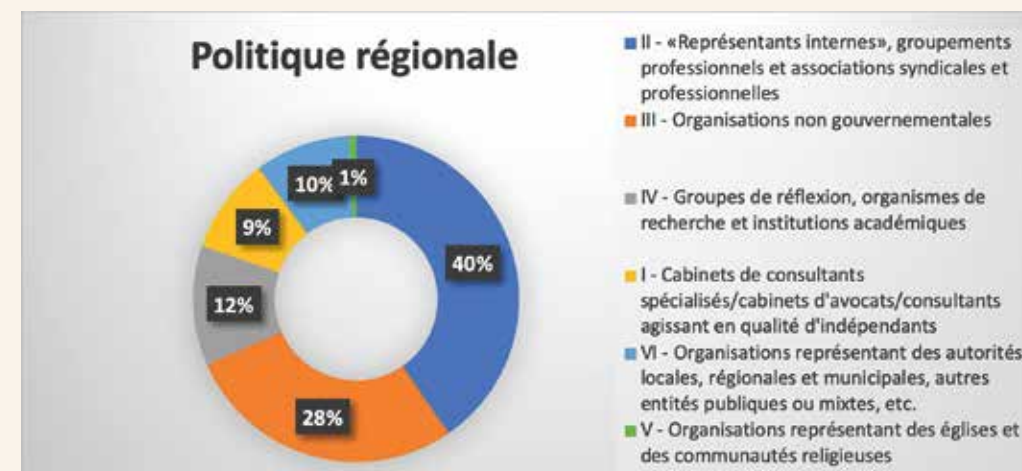
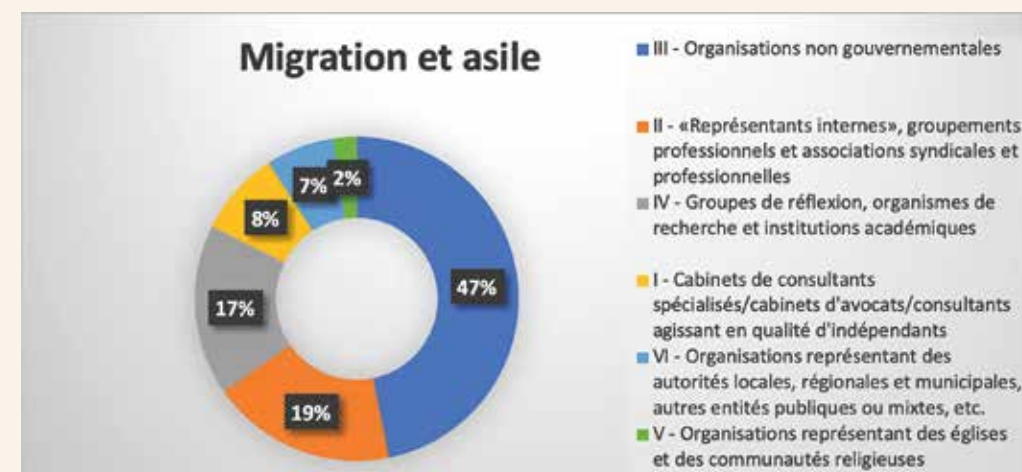
Appendix III

Detailed thematic breakdown of entities

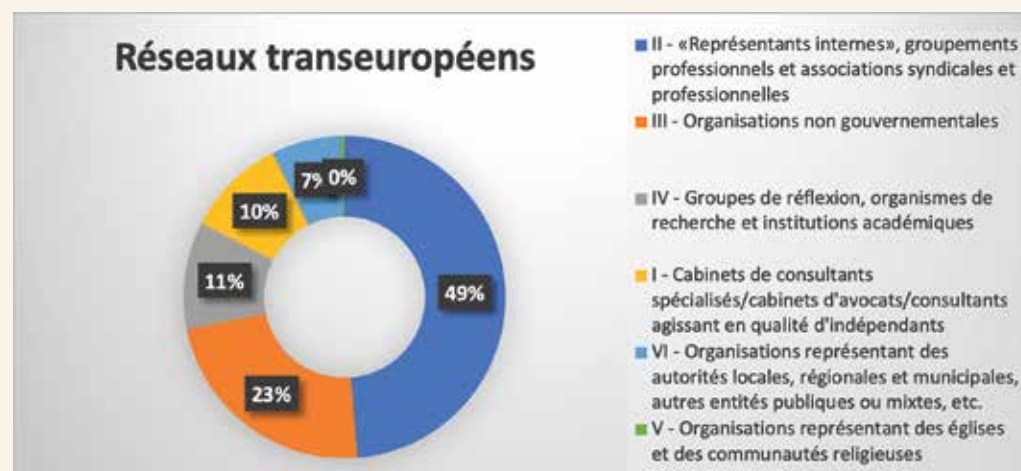
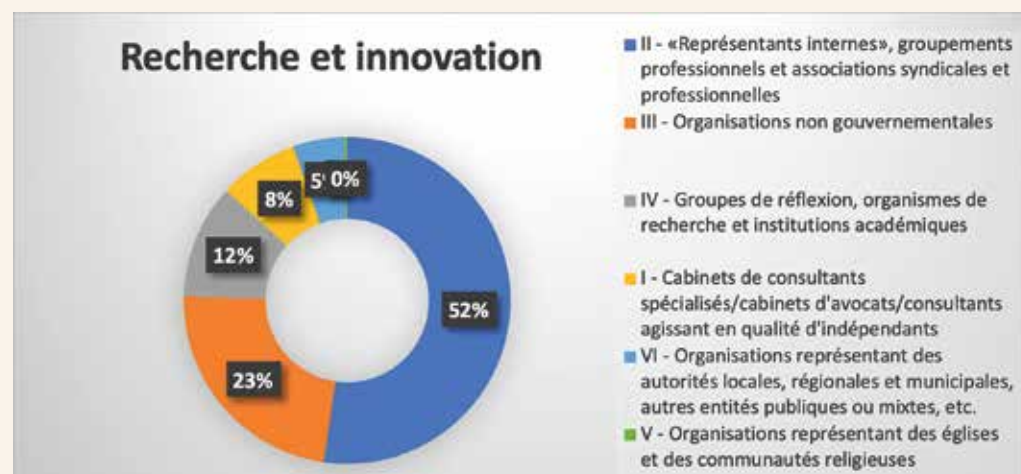


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Detailed thematic breakdown of entities

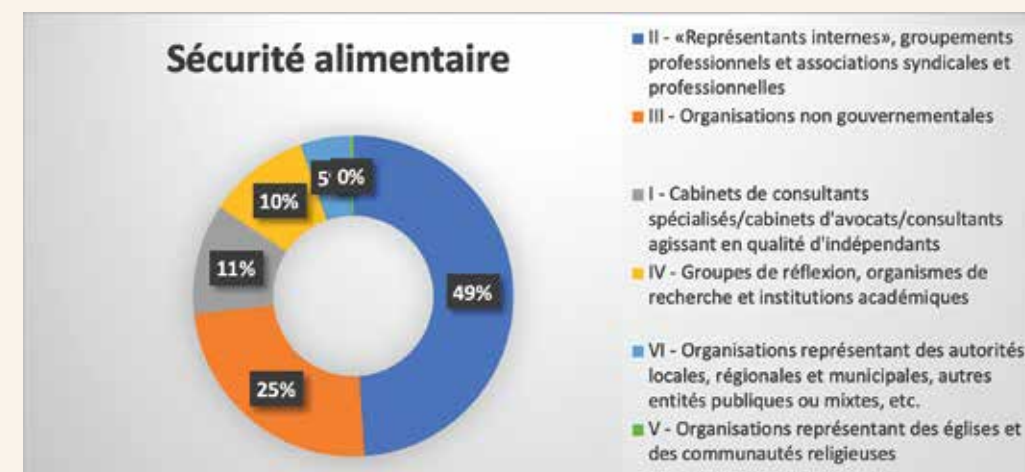
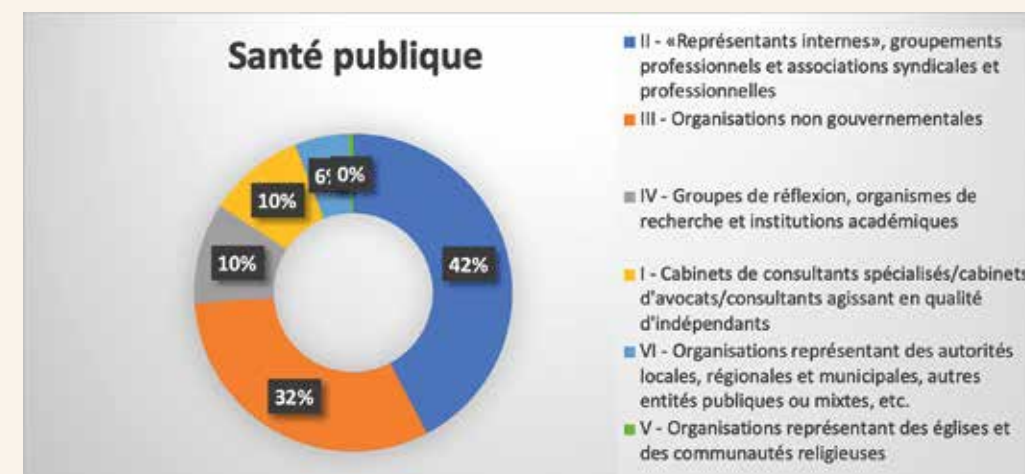


Detailed thematic breakdown of entities



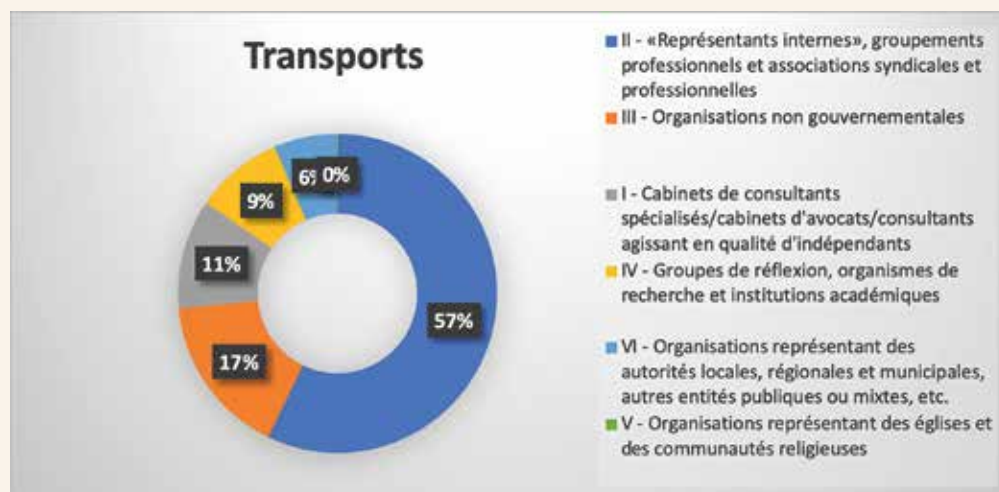
Appendix III

Detailed thematic breakdown of entities



Appendix III

Detailed thematic breakdown of entities



Appendix IV

Rankings

Top 100 most-funded NGOs

Organisation name	Budget	Country
Bill & Melinda Gates Foundation (BMGF)	33 578 111 937	United States
Consejo General de la Ingeniería Técnica Industrial (COGITI)	2 000 000 000	Spain
Médecins Sans Frontières International (MSF International)	1 632 123 000	Switzerland
British Council (BC)	1 44 9457 120	United Kingdom
SOS Children's Villages International (SOS CVI)	1 262 833 000	Austria
Croix Rouge Française (CRf)	1 191 621 584	France
Allgemeiner Deutscher Automobil-Club e.V. (ADAC e.V.)	1 007 545 702	Germany
Swiss National Science Foundation (SNSF)	965 842 000	Switzerland
European AIDS Clinical Society (EACS)	795 056 010	Belgium
Cancer Research UK (CRUK)	754 887 795	United Kingdom
The Pew Charitable Trusts (Pew)	690 343 782	United States
International Rescue Committee Belgium (IRC Belgium)	603 692 485	United States
European Internet Forum (EIF)	598 743 604	Belgium
Women Environmental Programme (WEP)	532 207 958	Nigeria
ACTION CONTRE LA FAIM (ACF)	450 000 000	France
World Economic Forum (WEF)	321 704 658	Switzerland
The Minderoo Foundation Pty Ltd ATF The Minderoo Foundation Trust	318 868 200	Australia
Brot für die Welt (BfW)	312 661 608	Germany
VolkswagenStiftung	276 683 406	Germany
PATH	250 443 924	United States
Deutsche Welthungerhilfe e.V. (WHH)	249 700 000	Germany
Österreichischer Automobil-, Motorrad- und Touring Club (ÖAMTC)	242 829 508	Austria
Bischöfliches Hilfswerk MISEREOR e.V. (MISEREOR)	232 300 000	Germany
Deutscher Caritasverband e.V. (DCV)	194 592 840	Germany
SNV - NETHERLANDS DEVELOPMENT ORGANISATION (SNV)	193 074 356	Netherlands
International Baccalaureate Organization (IBO)	191 527 000	Switzerland
Concern Worldwide	189 481 000	Ireland
Coalition for Epidemic Preparedness Innovations (CEPI)	188 730 392	Norway
KWF Kankerbestrijding (KWF)	185 254 000	Netherlands
Les Restaurants du Cœur	185 175 000	France
King Baudouin Foundation (KBF)	183 247 580	Belgium
Christian Aid	180 120 513	United Kingdom
Royal Society for the Protection of Birds (RSPB)	165 989 000	United Kingdom
Stichting Cordaid (Cordaid)	16 3875 000	Netherlands
SUISA, Genossenschaft der Urheber und Verleger von Musik (SUISA)	154 636 000	Switzerland
Society for Human Resource Management (SHRM)	152 753 257	United States
ASSOCIATION FEDERATION HANDICAP INTERNATIONAL (HI)	151349037	France
British Heart Foundation (BHF)	146 100 000	United Kingdom
Royal Society for the Prevention of Cruelty to Animals (RSPCA)	145 268 180	United Kingdom
FONDAZIONE CASSA DI RISPARMIO DELLE PROVINCIE LOMBARDE	144 856 451	Italy
Deutsches Rotes Kreuz e.V. (DRK)	136 251 331	Germany
European Cancer Patient Coalition (ECPC)	132 464 772	Belgium
Bertelsmann Stiftung	130 327 399	Germany
Internet Corporation for Assigned Names and Numbers (ICANN)	129 300 000	United States
DKMS gemeinnützige GmbH (DKMS)	121 668 199	Germany
Dogs Trust	109 542 000	United Kingdom
Wikimedia Foundation (WMF)	106 149 600	United States

Appendix IV

Rankings

Organisation name	Budget	Country
Arbeiter-Samariter-Bund Deutschland e.V. (ASB)	105 856 591	Germany
Association nationale de prévention en alcoologie et addictologie (ANPAA)	105 300 000	France
Verband der Ersatzkassen e.V. (vdek)	104 709 236	Germany
American Association for the Advancement of Science (AAAS)	104 457 459	United States
WaterAid	103 855 681	United Kingdom
Open Doors International (ODI)	103 580 579	United States
Natuurmonumenten (NM)	98 800 000	Netherlands
Solidarités International (SI)	98 138 797	France
Comisión Española de Ayuda al Refugiado (CEAR)	94 173 599	Spain
National Geographic Society (NGS)	93 745 041	United States
Kræftens Bekæmpelse	93 456 000	Denmark
DanChurchAid (DCA)	92 698 725	Denmark
WWF Deutschland (WWF)	92 415 296	Germany
National Wildlife Federation (NWF)	88 589 009	United States
Asociación Española Contra el Cáncer (AECC)	86 678 316	Spain
The HALO Trust (HALO)	85 634 650	United Kingdom
CBM Christoffel-Blindenmission Christian Blind Mission (CBM)	84 331 000	Germany
Hyresgästföreningen / The Swedish Union of Tenants (SUT)	83 152 800	Sweden
Landessportverband Baden-Württemberg e. V. (LSVBW)	82 620 025	Germany
Institut National de Recherche et de Sécurité (INRS)	79 001 850	France
European Climate Foundation (ECF)	76 713 971	Netherlands
Friedrich-Naumann-Stiftung für die Freiheit (FNF)	76 693 580	Germany
Swedish Red Cross (SRC)	74 863 000	Sweden
Human Rights Watch (HRW)	74 172 000	United States
The International Aids Vaccine Initiative Inc (IAVI)	71 626 380	United States
Relief International-UK (RI-UK)	71 402 000	United Kingdom
Voluntary Service Overseas (VSO)	69 566 000	United Kingdom
Rainforest Alliance (RA)	69 481 526	Netherlands
The British Academy	68 658 870	United Kingdom
Fondazione Telethon (FTELE)	67 676 000	Italy
Stiftung Mercator	63 400 000	Germany
Drugs for Neglected Diseases initiative (DNDi)	63 270 937	Switzerland
Stiftung Hilfswerk der Evangelischen Kirchen Schweiz (HEKS/EPER)	62 919 000	Switzerland
Global Alliance for Tuberculosis Drug Development (TB Alliance)	60 830 625	United States
CARE Deutschland e.V. (CARE DE)	58 546 775	Germany
Centre for Process Innovation Limited (CPI)	57 318 466	United Kingdom
World Wide Fund for Nature - Netherlands (WWF-NL)	56 925 000	Netherlands
C.I.D.A.S. - Cooperativa Inserimento Disabili Assistenza Solidarietà - Soc. Coop. a r.l. Società Cooperativa Sociale – I.S. (C.I.D.A.S.)	56 120 206	Italy
Norwegian Cancer Society (NCS)	56 117 000	Norway
Alliance to End Plastic Waste, Inc.	55 629 000	Singapore
Koninklijke Nederlandse Toeristenbond ANWB (ANWB)	55 590 299	Netherlands
Parkinson's UK	52 876 712	United Kingdom
Stichting Aidsfonds - Soa Aids Nederland (Aidsfonds)	52 814 000	Netherlands
Foundation for Innovative New Diagnostics (FIND)	51 950 599	Switzerland
Verbraucherzentrale Nordrhein-Westfalen e.V. (VZ NRW)	49 045 016	Germany

Appendix IV

Rankings

Organisation name	Budget	Country
Diakonie Katastrophenhilfe (DKH)	49 037 528	Germany
AVSI Foundation	47 841 080	Italy
Center for Reproductive Rights, Inc.	46 989 755	United States
Naturschutzbund Deutschland e.V. (NABU)	45 966 270	Germany
Kirkon Ulkomaanapu sr (Finn Church Aid) (FCA)	45 912 743	Finland
Stichting Koninklijk Nederlands Normalisatie Instituut (NEN)	45 907 000	Netherlands
The National Center for Missing and Exploited Children (NCMEC)	45 653 500	United States
AIDES	44 853 122	France

Ranking of NGOs by number of staff

Organisation name	Number of people involved
Asociación para la Defensa de la Naturaleza (WWF España)	50
Citizens' Climate Europe (CCL EU)	50
Transparency International (TI)	48
Ελληνικό Δίκτυο ΦΙΛΟΙ της ΦΥΣΗΣ (ΦΤΦ NFGR)	48
International Crisis Group (ICG)	46
Associazione Europea Ferrovieri (AEC)	43
Verbraucherzentrale Bundesverband (vzbv)	41
European Young Engineers MTÜ (EYE)	40
ONDAID - OBSERVATÓRIO NACIONAL PARA A DEFESA DOS ANIMAIS E INTERESSES DIFUSOS, ASSOCIAÇÃO (ONDAID)	40
WWF Deutschland (WWF)	39
GLOBSEC (GLOBSEC)	37
Deusto Foundation - Basque Institute of Competitiveness (Orkestra) (FD)	37
European Migraine and Headache Alliance (EMHA)	36
Europeana Network Association (ENA)	36
WWF European Policy Programme (WWF EPO)	35
European Environmental Bureau (EEB)	35
Transport and Environment (European Federation for Transport and Environment) (T&E)	35
OZ Bez bariéry - Národná platforma proti bariéram (BB - NPPB)	35
Organización Mundial de Ciudades y Gobiernos Locales Unidos - United Cities and Local Governments (UCLG)	35
Bureau Européen des Unions de Consommateurs (BEUC)	33
The Pew Charitable Trusts (Pew)	33
Stichting Solidaridad Nederland (Solidaridad)	33
Naturschutzbund Deutschland e.V. (NABU)	32
Társaság a Szabadságjogokért (TASZ)	32
The Applied Research Institute - Jerusalem (ARIJ)	32
Asociatia Moldova Vrea Autostrada (MVA)	30
Institute of Entrepreneurship Development (IED)	30
Fundación Secretariado Gitano (FSG)	30
European Federation of Clinical Chemistry and Laboratory Medicine (EFLM)	30
Association Française pour la Prévention des Catastrophes Naturelles (AFPCN)	30
Comisión Española de Ayuda al Refugiado (CEAR)	30

Appendix IV

Rankings

NGO ranking by full-time equivalent (FTE)

Organisation name	Full-time equivalent (FTE)
Asociación para la Defensa de la Naturaleza (WWF España)	39,75
Deusto Foundation - Basque Institute of Competitiveness (Orkestra) (FD)	37
Organización Mundial de Ciudades y Gobiernos Locales Unidos - United Cities and Local Governments (UCLG)	34,75
The Pew Charitable Trusts (Pew)	33
European Environmental Bureau (EEB)	32
Stichting Solidaridad Nederland (Solidaridad)	31
Institute of Entrepreneurship Development (IED)	29
Unión Nacional de Instituciones para el Trabajo de Acción Social (UNITAS)	28
European Youth Forum (YFJ)	27,5
WWF European Policy Programme (WWF EPO)	26,25
Transparency International (TI)	25
Bureau Européen des Unions de Consommateurs (BEUC)	24,75
EUROPEAN MEDICINES VERIFICATION ORGANISATION (EMVO)	23
Ελληνικό Δίκτυο ΦΙΛΟΙ της ΦΥΣΗΣ (ΦτΦ NFGR)	20,75
ONDAID - OBSERVATÓRIO NACIONAL PARA A DEFESA DOS ANIMAIS E INTERESSES DIFUSOS, ASSOCIAÇÃO (ONDAID)	20
Eurocities	20
Marevivo Onlus (Marevivo)	20
Arbeitskreis Integrated Reporting und Sustainable Management der Schmalenbach-Gesellschaft für Betriebswirtschaft e.V. (Working Group on Integrated Reporting and Sustainable Management of the Schmalenbach-Gesellschaft für Betriebswirtschaft) (AKIR)	20
The Applied Research Institute - Jerusalem (ARIJ)	19,75
Forbrugerrådet Tænk (the Danish Consumer Council)	19,75
International Federation of Red Cross and Red Crescent Societies (IFRC)	19,75
WWF Deutschland (WWF)	19
Caritas Europa (Caritas Europa)	19
Erasmus Student Network (ESN)	18,5
Plastic Soup Foundation	18,25
Netherlands Helsinki Committee (NHC)	18,25
C.R.E.A.M. Europe PPP Alliance (C.R.E.A.M.)	18
World Wide Fund for Nature - Greece (WWF Greece)	18
Instituto Padre António Vieira (IPAV)	18
Health Care Without Harm Europe (HCWH Europe)	18

Appendix V

European-funded NGOs

We have taken the NGOs in Integrity Watch's top 10 as our sample. Funded by the European Union - in particular through its various programmes.

NGO	European grant
Access Now Europe	Yes
ActionAid	Yes
Alliance for Logistics Innovation through Collaboration in Europe (ALICE)	Yes
Better Finance	Yes
Bibliothèques Sans Frontières (BSF)	Yes
British Council	Yes
Bureau Européen des Unions de Consommateurs	Yes
Carbon Market Watch	Yes
CARE International Aisbl	Yes
CARITAS Europa	Yes
CEE Bankwatch Network	Yes
ClientEarth	Yes
Climate Action Network Europe	Yes
Climate Alliance	Yes
CONCORD Europe	Yes
Confederation of Family Organisations in the European Union (COFACE)	Yes
Conseil Européen des Jeunes Agriculteurs (CEJA)	Yes
Corporate and Social Responsibility (CSR) Europe	Yes
Digitalcourage e.V.	Yes
Eastern Partnership Civil Society Forum	Yes
ECRE	Yes
Energy Cities	Yes
Environmental Justice Foundation	Yes
Equinet	Yes
EU-Japan Centre for Industrial Cooperation	Yes
EUN Partnership aisbl	Yes
Eurocities	Yes
Eurodiaconia	Yes
EuroMed Rights / EuroMed Droits	Yes
Europa Nostra	Yes
European Alcohol Policy Alliance (Eurocare)	Yes
European Anti Poverty Network (EAPN)	Yes
European Association for the Co-ordination of Consumer Representation in Standardisation (ANEC)	Yes
European Association of service providers for persons with disabilities (EASPD)	Yes
European Blind Union	Yes
European Business Summit Network	Yes
European Chamber of Commerce in Vietnam (EuroCham)	Yes
European Conservation Agriculture Federation (ECAAF)	Yes
European Cyclists' Federation	Yes
European Digital Rights (EDRi)	Yes
European Disability Forum (EDF)	Yes

Appendix V

European-funded NGOs

NGO	European grant
European Endowment for Democracy (EED)	Yes
European Environmental Bureau	Yes
European Federation of National Organisations working with the Homeless (FEANTSA)	Yes
European Festivals Association	Yes
European Health Forum Gastein	Yes
European Institute of Peace (EIP)	Yes
European Law Institute	Yes
European Network Against Racism	Yes
European Network on Debt and Development (Eurodad)	Yes
European Organisation for Rare Diseases (Eurordis)	Yes
European Public Health Alliance (EPHA)	Yes
European Regions Research and Innovation Network	Yes
European Road Transport Research Advisory Council (ERTRAC)	Yes
European Transport Safety Council (ETSC)	Yes
European University Association (EUA)	Yes
European Women's Lobby	Yes
European Youth Forum (EYF)	Yes
Europeana Foundation	Yes
Federation of Associations for Hunting & Conservation of the EU (FACE)	Yes
Fern	Yes
Finance Watch	Yes
Friends of the Earth Europe	Yes
ILGA-Europe	Yes
International Alliance of Catholics social justice organisations	Yes
International Council on Clean Transportation	Yes
International Crisis Group	Yes
International Federation for Human Rights	Yes
International Financial Reporting Standards (IFRS) Foundation	Yes
International Partnership for Human Rights	Yes
International Rescue Committee Belgium	Yes
International Union for Conservation of Nature EU (IUCN EURO)	Yes
Lumos Foundation	Yes
Macra na Feirme (Macra)	Yes
Médecins Sans Frontières International	Yes
OCEANA	Yes
Oxfam-Solidarité	Yes
PICUM	Yes
Royal Society for the Protection of Birds (RSPB)	Yes
Rural Support for Europe (RISE) Foundation	Yes
Seas At Risk	Yes
SGI Europe	Yes
Social Platform	Yes
SolidarityNow (SN)	Yes

Appendix V

European-funded NGOs

NGO	European grant
Stichting BirdLife Europe	Yes
Stichting ERGO Network	Yes
Stichting Fair Trade Advocacy Office (FTAO)	Yes
Sustainable Development Institute (SDI)	Yes
The Nature Conservancy in Europe	Yes
Transparency International	Yes
Transport and Environment	Yes
Victim Support Europe (VSE)	Yes
Voluntary Organisations in Cooperation in Emergencies (VOICE asbl)	Yes
Wellcome Trust	Yes
World Economic Forum	Yes
WWF	Yes
ACT Alliance EU	No
AHEPA 610 Brussels	No
Allied for Startups asbl (AFS)	No
Amnesty International Europe	No
Association of European Performers' Organisations	No
Association of European Performers' Organisations (AEPO-ARTIS)	No
Avaaz Foundation	No
Bertelsmann Stiftung	No
BLOOM Association	No
British in Europe (BiE)	No
Bundesarbeitsgemeinschaft der Freien Wohlfahrtspflege e.V. (BAGFW)	No
Center for Democracy & Technology Europe	No
Center for Humane Technology (CHT)	No
COBATY International	No
Common Sense Media	No
Compassion in World Farming Brussels	No
Conservation International Europe	No
Council of European Energy Regulators (CEER)	No
Cruise Lines International Association Europe	No
Deep Sea Conservation Coalition	No
Diakonie Deutschland	No
DSW (Deutsche Stiftung Weltbevoelkerung)	No
Ellen MacArthur Foundation	No
Eucor - The European Campus	No
EURODOM	No
Eurogroup for Animals	No
European Association of Long-Term Investors (ELTI)	No
European Climate Foundation	No
European Cyber Security Organisation	No
European Federation of Road Traffic Victims (FEVR)	No
European Olympic Committees	No

Appendix V

European-funded NGOs

NGO	European grant
Federation of Swedish Family Forest Owners (LRF Forest)	No
France Digitale	No
Gates Foundation	No
Global Cyber Alliance Belgium (GCA)	No
Global Witness	No
Green 10	No
GS1	No
Human Rights Watch	No
ICANN	No
ICMP, the global voice of music publishing	No
IKV, Fondation pour le Développement Economique (IKV)	No
Initiative Urheberrecht	No
Inland Navigation Europe (INE)	No
JA Europe	No
Konrad Adenauer Stiftung	No
La Quadrature Du Net (LQDN)	No
Netherland House for Education and Research (Neth-ER)	No
Norwegian Refugee Council Europe	No
ONE	No
OSEPI	No
OXFAM EU	No
Plan International EU	No
Save The Children Europe	No
ShareAction Europe	No
Solar Impulse Foundation	No
Stiftung Familienunternehmen	No
The Pew Charitable Trusts	No
the3million (t3m)	No
Tony Blair Institute for Global Change (TBI)	No
Transatlantic Institute	No
Women Political Leaders	No

Appendix V

European-funded NGOs

The most heavily subsidised NGOs

NGO	Grant (137)
ACTION CONTRE LA FAIM (ACF)	80 000 000
International Rescue Committee Belgium (IRC Belgium)	64 761 603
British Council (BC)	43 510 543
GÉANT Association (GÉANT)	39 474 000
ASSOCIATION FEDERATION HANDICAP INTERNATIONAL (HI)	38 008 451
Solidarités International (SI)	30 871 945
International Federation of Red Cross and Red Crescent Societies (IFRC)	29 400 000
Les Restaurants du Cœur	27 715 000
Relief International-UK (RI-UK)	27 640 000
Deutsche Welthungerhilfe e.V. (WHH)	26 500 000
Concern Worldwide	24 058 000
Coalition for Epidemic Preparedness Innovations (CEPI)	19 799 990
CARE Österreich	12 594 000
International Falcon Movement - Socialist Educational International (IFM-SEI)	12 424 088
DanChurchAid (DCA)	12 294 893
SNV - NETHERLANDS DEVELOPMENT ORGANISATION (SNV)	11 339 998
Fundación Secretariado Gitano (FSG)	10 885 526
AVSI Foundation	10 828 383
Fondazione Penta - for the treatment and care of children with HIV and related diseases	10 490 000
Arbeiter-Samariter-Bund Deutschland e.V. (ASB)	10 466 959
Allieleggie SolidarityNow (SN)	10 327 551
Anna Lindh Foundation (ALF)	10 290 000
European Judicial Training Network (EJTN)	10 091 296
Croix Rouge Française (CRf)	9 514 749
European Endowment for Democracy (EED)	8 000 000
CARE Deutschland e.V. (CARE DE)	7 873 239
European Centre for Electoral Support (ECES)	6 513 224
CARE France	6 359 773
SOS Children's Villages International (SOS CVI)	6 314 160
The HALO Trust (HALO)	6 200 000
Oxfam-Solidarité / Oxfam-Solidariteit	6 096 096
Aga Khan Foundation (United Kingdom) (AKF(UK))	5 931 000
Search for Common Ground (Search)	5 878 466
COSPE - Cooperazione per lo Sviluppo dei Paesi Emergenti Onlus (COSPE)	5 704 626
Centre for Process Innovation Limited (CPI)	4 905 977
Stichting Cordaid (Cordaid)	4 724 000
International Financial Reporting Standards (IFRS) Foundation (IFRS Foundation)	4 716 688
Nadacia Habitat for Humanity International (NHFHI)	4 707 756
AGENTIA PENTRU DEZVOLTARE REGIONALA BUCURESTI-ILFOV (ADRBI)	4 521 306
Internews Europe (IEU)	4 353 158
European Network for Health Technology Assessments (EUnetHTA)	4 351 858
Médecins du monde Belgique (MdM-BE)	3 969 422
Kirkon Ulkomaanapu sr (Finn Church Aid) (FCA)	3 967 714

137. Please note that this is a grant awarded for the NGOs' most recent financial year.

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European-funded NGOs

NGO	Grant
Medicos del Mundo (MdM ES)	3 951 000
EUROCITIES	3 933 807
Christian Aid	3 915 636
Practical Action	3 796 358
Deutsches Rotes Kreuz e.V. (DRK)	3 579 220
Europäisches Zentrum für Arbeitnehmerfragen (EZA)	3 545 900
International Land Coalition (ILC)	3 491 818
Suomalaiset kehitysjärjestöt Fingo ry (FINGO ry)	3 33 8578
International Commission of Jurists (ICJ)	3 311 870
IKERLAN S. COOP. (IKERLAN)	3 275 000
European Financial Reporting Advisory Group (EFRAG)	2 864 000
Fondazione Telethon (FTELE)	2 753 000
International Federation for Human Rights (FIDH)	2 707 176
Climate Alliance of European cities with indigenous rainforest peoples (Climate Alliance)	2 671 139
European Youth Forum (YFJ)	2 667 068
Natagora asbl (Natagora)	2 655 000
European Marine Energy Centre Ltd (EMEC)	2 635 000
Research Council of Norway (RCN)	2 629 975
HET NEDERLANDSE RODE KRUIS (NLRC)	2 604 000
Asian Forum for Human Rights and Development (FORUM-ASIA)	2 569 047
EMERGENCY LIFE SUPPORT FOR CIVILIAN WAR VICTIMS ONG ONLUS (EMERGENCY ONG ONLUS)	2 507 690
Optical Infrared coordination network for astronomy (OPTICON)	2 500 000
Deutscher Caritasverband e. V. (DCV)	2 484 914
European Chamber of Commerce in Cambodia (EuroCham Cambodia)	2 448 144
Fairtrade International (FI)	2 427 000
EUN Partnership aisbl (EUN)	2 414 471
European Environmental Bureau (EEB)	2 408 426
CARE International Aisbl (CI)	2 385 761
Appel de Genève / Geneva Call (Geneva Call)	2 379 469
Forum réfugiés-Cosi	2 345 405
Global Network of Civil Society Organisations for Disaster Reduction (GNDR)	2 313 026
Stichting EGI (EGI Foundation)	2 309 117
Fondation Hirondelle, Media for Peace and Human Dignity (Fondation Hirondelle)	2 262 610
Fundacion Alianza por los Derechos, la Igualdad y la Solidaridad Internacional (Fundación Alianza)	2 249 769
IBON International Foundation, Inc.	2 245 004
Stichting Solidaridad Nederland (Solidaridad)	2 244 539
Saferworld	2 215 127
HelpAge International (HelpAge)	2 183 137
AGENZIA PER LA PROMOZIONE DELLA RICERCA EUROPEA (APRE)	2 138 719
Eucor – The European Campus (Eucor)	2 115 360
We Effect	2 022 910
Association pour le Développement des Initiatives Citoyennes et Européennes (ADICE)	2 010 197
Fondation Internationale pour les Défenseurs des Droits de l'Homme (ProtectDefenders.eu)	1 992 457
Charita Česká republika (CHČR)	1 975 440
Bureau Européen des Unions de Consommateurs (BEUC)	1 958 915

Appendix V

European-funded NGOs

NGO	Grant
ASOCIACION PROYECTO HOMBRE (APH)	1 934 020
Diakonie Katastrophenhilfe (DKH)	1 930 000
CITES ET GOUVERNEMENTS LOCAUX UNIS D'AFRIQUE (CGLU AFRIQUE)	1 912 850
EUROPEAN ORGANISATION FOR RARE DISEASES (EURORDIS)	1 830 597
Soros Foundation-Moldova (SFM)	1 829 677
COLLECTIF STRATEGIES ALIMENTAIRES (C.S.A.)	1 658 486
Naturschutzbund Deutschland e.V. (NABU)	1 598 378
World Economic Forum (WEF)	1 595 100
E-zavod (EZVD)	1 556 765
Bodensee-Stiftung (Lake Constance Foundation) (LCF)	1 539 000
European Association of Service providers for Persons with Disabilities (EASPD)	1 528 122
Front Line Defenders (FLD)	1 515 194
Ligue pour la Protection des Oiseaux/BirdLife France (LPO)	1 502 976
Organización Mundial de Ciudades y Gobiernos Locales Unidos - United Cities and Local Governments (UCLG)	1 500 000
Christliche Initiative Romero (CIR)	1 498 044
Deutsche Umwelthilfe e.V. (DUH)	1 475 126
European Association for the Co-ordination of Consumer Representation in Standardisation (ANEC)	1 440 853
Drugs for Neglected Diseases initiative (DNDi)	1 429 198
Sociedade Portuguesa para o Estudo das Aves (SPEA)	1 414 787
The Traidcraft Exchange	1 401 000
Minority Rights Group (MRG)	1 387 664
Natuurmonumenten (NM)	1 383 617
Friends of the Earth Europe (FoEE)	1 372 879
Slow Food (NA)	1 343 242
Baltic Environmental Forum-Latvia (BEF-Latvia)	1 320 143
European Environmental Citizens' Organisation for Standardisation (ECOS)	1 277 854
International Sport and Culture Association (ISCA)	1 259 267
Caritas Europa (Caritas Europa)	1 258 451
WaterAid	1 244 318
Skillman.eu (Skillman.eu)	1 213 369
Digital Research Infrastructure for the Arts and Humanities (DARIAH ERIC)	1 208 915
AGE Platform Europe (AGE)	1 186 835
International School Sport Federation (ISF)	1 160 440
Penal Reform International (PRI)	1 154 793
Organizace pro pomoc uprchlíkům (OPU)	1 151 871
The European Region of the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA-Europe)	1 112 633
Fundación CEPAIM. Acción Integral con Migrantes. (CEPAIM)	1 106 436
Atomium - European Institute for Science, Media and Democracy (Atomium -EISMD)	1 100 000
Legambiente Onlus (Legambiente)	1 099 453
CONCORD Europe	1 093 776
Democracy Reporting International (DRI)	1 074 202
European Women's Lobby (EWL)	1 071 004
Sustainable Development Institute (SDI)	1 064 542
Økologisk Landsforening/Organic Denmark	1 061 746
European Disability Forum (EDF)	1 050 000

Appendix V

European-funded NGOs

NGO	Grant
Global Nature Fund (GNF)	1 047 084
European Network of National Human Rights Institutions (ENNHRI)	1 037 062
Women Engage for a Common Future (WECF)	1 031 441
European Research Consortium for Informatics and Mathematics (ERCIM)	1 018 908
International Association for the Evaluation of Educational Achievement (IEA)	1 004 060
Voluntary Service Overseas (VSO)	1 000 203
Stichting Free Press Unlimited (FPU)	1 000 000
European Anti Poverty Network (EAPN)	996 660
INSTITUTO DE BIOMECÁNICA DE VALENCIA (IBV)	991 000
European Network on Debt and Development (Eurodad)	985 842
European Federation of National Organisations working with the Homeless (FEANTSA)	976 886
Equinet - the European Network of Equality Bodies (Equinet)	971 659
Forum Européen pour la Sécurité Urbaine (Efus)	970 133
Finance Watch	964 477
Umweltorganisation WWF Central and Eastern Europe (WWF-CEE)	957 467
The Secretariat of the Steering Committee of the Eastern Partnership Civil Society Forum (EaP CSF Secretariat)	950 000
FUNDACIÓN ECOLOGÍA Y DESARROLLO (ECODES)	940 341
EuroHealthNet	930 000
Fondation Mérieux (FMX)	920 139
International Institute for Environment and Development (IIED)	917 917
CEE Bankwatch Network (BWN)	903 625
European Cyclists' Federation (ECF)	898 364
European Network Against Racism (ENAR)	887 950
Crisis Management Initiative (CMI)	884 345
Woord en Daad Foundation	873 946
World Organisation against Torture (OMCT)	872 467
Alzheimer Europe (AE)	870 620
International Crisis Group (ICG)	860 634
Eurochild AISBL	856 806
WWF European Policy Programme (WWF EPO)	849 007
Sociedad Española de Ornitología (SEO/BirdLife)	847 157
Forus(Forum International des plateformes nationales d'ONG) (Forus)	842 142
CDP Worldwide (Europe) gGmbH (CDP Europe)	839 318
Institute of Entrepreneurship Development (IED)	838 000
CIVICUS: World Alliance for Citizen Participation (CIVICUS)	823 929
Public Safety Communication Europe (PSCE)	814 567
EuroMed Rights / EuroMed Droits (EuroMed Rights)	803 487
KulturLife g GmbH	800 000
International Union for Conservation of Nature EU Representative Office (IUCN EURO)	797 444
Tropenbos International (TBI)	794 000
Stichting Rewilding Europe	792 756
Reporters sans frontières (RSF)	783 514
Environmental Justice Foundation (EJF)	777 110
Swedish Red Cross (SRC)	763 000
The Applied Research Institute - Jerusalem (ARIJ)	760 000

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European-funded NGOs

NGO	Grant
European Social Network (ESN)	753 954
UNITEE AISBL	752 703
C.I.D.A.S. - Cooperativa Inserimento Disabili Assistenza Solidarietà - Soc. Coop. a r.l. Società Cooperativa Sociale – I.S. (C.I.D.A.S.)	737 871
Sihtasutus Eestimaa Looduse Fond (ELF)	731 783
European Peacebuilding Liaison Office (EPLO)	724 119
SOLIDAR	722 895
Association of Cities and Regions for sustainable Resource management (ACR+)	721 862
European Partnership for Democracy (EPD)	719 117
Jesuit Refugee Service - Europe (JRS-E)	717 846
Foundation Lygature (LYG)	704 000
Stichting IUCN Nederlands Comité (IUCN NL)	689 772
AquaTT UETP CLG (AquaTT)	681 280
the Association for the Promotion of Natural and Cultural Heritage of Banat and Crisana Excelsior (Excelsior)	681 190
European University Foundation - Campus Europae (EUF)	675 810
The Smile of the Child (TSOC)	673 096
World Obesity Federation (WOF)	667 383
Platform for International Cooperation on Undocumented Migrants (PICUM)	664 199
Interpeace (Interpeace)	659 396
ΕΛΛΗΝΙΚΗ ΟΡΝΙΘΟΛΟΓΙΚΗ ΕΤΑΙΡΕΙΑ	657 083
World Federalist Movement-Institute for Global Policy; including the Coalition for the International Criminal Court (WFM-IGP)	655 782
Forest Peoples Programme (FPP)	654 782
Erasmus Student Network (ESN)	648 000

Appendix VI

American NGOs

We have listed them by budget (138)

138. Reminder: these are NGOs that do not have a Brussels office.

NGO	Budget
Bill & Melinda Gates Foundation (BMGF)	33 578 111 937
The Pew Charitable Trusts (Pew)	690 343 782
International Rescue Committee Belgium (IRC Belgium)	603 692 485
PATH	250 443 924
Society for Human Resource Management (SHRM)	152 753 257
Internet Corporation for Assigned Names and Numbers (ICANN)	1293 00 000
Wikimedia Foundation (WMF)	106 149 600
Open Doors International (ODI)	103 580 579
National Geographic Society (NGS)	93 745 041
American Association for the Advancement of Science (AAAS)	93 109 533
National Wildlife Federation (NWF)	88 589 009
Human Rights Watch (HRW)	74 172 000
The International Aids Vaccine Initiative Inc (IAVI)	71 626 380
Global Alliance for Tuberculosis Drug Development (TB Alliance)	60 830 625
Center for Reproductive Rights, Inc.	46 989 755
Global Citizen	46 000 000
The National Center for Missing and Exploited Children (NCMEC)	45 653 500
Automated Financial Systems Inc. (AFS)	42 000 000
Patrick J. McGovern Foundation (PJMF)	37 265 625
Ashoka	37 000 000
ROTARY INTERNATIONAL (R.I.)	35 000 000
Internet Society (ISOC)	33 546 000
Kids in Need of Defense (KIND)	25 955 335
Thorn	20 060 000
Common Sense Media	19 222 762
Avaaz Foundation	18 037 505
Food & Water Action Europe (FWAE)	17 079 729
Clean Air Task Force, Inc. (CATF)	14 029 769
Electronic Frontier Foundation (EFF)	13 360 900
Natural Resource Governance Institute (NRGI)	11 297 303
American Forest Foundation (AFF)	9 900 000
Open Government Partnership Secretariat (OGP)	9 652 346
Sustainability Accounting Standards Board Foundation (SASB)	8 800 000
International Council on Clean Transportation (ICCT)	8 707 995
Committee to Protect Journalists (CPJ)	8 435 489
World Justice Project (WJP)	8 079 766
AAALAC International (AAALAC)	7 000 000
Alliance for Regenerative Medicine (ARM)	6 691 534
Access Now	6 492 033
Counter Extremism Project (CEP)	6 421 189
International Society for Stem Cell Research (ISSCR)	5 863 972
SumOfUs	5 771 575
Blacksmith Institute (doing business as Pure Earth)	5 009 332
Centre for Democracy & Technology, Europe (CDTE)	4 704 540

Appendix VI

American NGOs

NGO	Budget
Center for Humane Technology (CHT)	4 374 317
Open Contracting Partnership (OCP)	4 298 693
World Wide Web Foundation (WF)	4 043 053
Center for International Environmental Law (CIEL)	3 683 976
Cyber Threat Alliance (CTA)	3 660 218
Mighty Earth	3 150 000
Government Accountability Project (GAP)	2 948 241
Textile Exchange	2 765 787
Organization for the Advancement of Structured Information Systems (OASIS)	2 684 651
The Regulatory Assistance Project (RAP)	2 680 588
Carnegie Climate Governance Initiative (C2G)	2 600 000
Humane Society International/Europe (HSI/Europe)	2 346 638
Shift Project Limited (Shift)	2 196 761
Independent Diplomat (ID)	2 188 637
Freedom Now	2 166 847
Accountability Counsel	2 051 719
Social Progress Imperative (SPI)	1 913 130
ICCBBA (ICCBBA)	1 889 942
ChildFund Alliance	1 695 891
Global Network Initiative (GNI)	1 527 217
Creative Commons (CC)	1 503 886
Environmental Defense Fund, Incorporated (EDF)	1 450 000
Non Profit Enterprise and Self-sustainability Team (NESST)	1 424 255
Financial Transparency Coalition (FTC)	1 299 476
Think Beyond Plastic (TBP)	1 170 000
Ocean Unite	1 080 300
Disability Rights International (DRI)	1 004 497
Consumer Choice Center (CCC)	9 83 015
International Tax and Investment Center (ITIC)	978 387
Parliamentarians for Global Action (PGA)	926 782
International Pet & Animal Transportation Association (IPATA)	864 000
The Committee for Human Rights in North Korea (HRNK)	751 010
International Consumer Product Health and Safety Organization (ICPHSO)	744 698
All Out Action Fund Inc. (All Out)	742 101
The Mentor Group	712 853
Institute for Agriculture & Trade Policy (IATP)	662 473
Basel Action Network (BAN)	646 075
Cloud Communications Alliance (CCA)	631 083
Partnership for Policy Integrity (PFPI)	583000
The Accountability Framework (AFi)	533 239
Financial Accountability and Corporate Transparency Coalition (FACT Coalition)	513 199
Microfinance Opportunities (MFO)	490 000
Transatlantic Policy Network (TPN)	487 251
Southern Environmental Law Center (SELC)	463 594

Appendix VI

American NGOs

NGO	Budget
Collaborative Labelling and Appliance Standards Program (CLASP)	406 667
Open Source Initiative (OSI)	402 967
Organization for Transformative Works (OTW)	337 000
Royal Academy of Science International Trust (RASIT)	277 700
Investor Alliance For Human Rights (IAHR)	200 000
The Future Society (TFS)	167 000
Young Professionals in Foreign Policy (YPFP)	163 000
International Association of Applied Psychology (IAAP)	141 400
International Forum of Insurance Guarantee Schemes (IFIGS)	100 000
ACM EUROPE (ACM-E)	85 000
International Photonics Advocacy Coalition (IPAC)	85 000
Common Rights	75 000
Alliance for Organic Integrity (AOI)	66 000
European Horizons	54 500
Prostasia Foundation	49 074
World Animal Net (WAN)	45 406
World Roma Federation (WRF)	25 000
International Association of Drilling Contractors (IADC)	10 000
Social Value US (SV US)	900
Breakthrough Energy Catalyst Foundation	0
Healthy Brains Global Initiative, Inc. (HBGI)	0
Pandemic Action Network (PAN)	0 ⁽¹³⁹⁾
International Federation of Physician Assistant/Physician Associate and Clinical Officer/Clinical Associate/Comparable Students' Association (IFPACS)	0

139. Zero budget is explained by recent registration in the European Commission's Transparency Register. The Pandemic Action Network, for example, was registered on 18 June 2020.



PATRIOTS

FOR *EUROPE* FOUNDATION

**Study published by Patriots for Europe Foundation
25 Boulevard Romain Rolland – 75014 – Paris – France
SIRET number: 823 400 239 00021
President of Patriots for Europe Foundation: Andràs Laszlo
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Published in 2023
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www.pfe-foundation.eu**

The Patriots for Europe Foundation is partly funded by the European Parliament and is solely sole responsibility for this publication. This publication is not for sale.