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Fake NGOs and think tanks – the need for vigilance

There are many types of actors in the Brussels lobbying scene: diplomats, business lobbyists, civil society campaigners, lawyers, and many more including EU officials themselves. Most are honest representatives of the particular interests for whom they advocate. Not all of them, however, are entirely what they seem.

The roles of diplomatic and other government representatives are well understood and set out in international law. The activities of private sector lobbyists are regulated under the Transparency Register and under EPACA's own [code of conduct](#). Members of the European Parliament (MEPs) who are meeting with a government or industry representative generally know who they are talking to and who is behind them – and if they are not sure, they are not afraid to ask.

The non-profit sector also has a very important role in the policy mix. Genuine voices from civil society are essential for good policy-making. Voices from outside the public and private sectors need to be heard, and the EU institutions will generally make space to hear from them. The European Parliament in particular is a welcoming environment for the non-profit sector.

Unfortunately, there have been some notable recent cases of MEPs' goodwill towards NGOs being abused by malign actors:

- The 'Fight Impunity' NGO, set up by a former MEP, was at the centre of the *Qatargate* scandal
- The 'Democracy Centre for Transparency' was exposed by POLITICO in April 2024 as also lobbying for the Qatari government
- The 'Fondation Democratie et Gouvernance' spread disinformation among MEPs about technology firm Dentsu Tracking

These bogus NGOs have several things in common. They manipulated the European Parliament's processes by getting MEPs to host meetings, debate resolutions and put questions to the Commission; they claimed to be dedicated to noble ideals; they did not sign up to the EU Transparency Register; they did not reveal the sources of their funding; they pushed the policy demands of their non-EU funders within the European Parliament.

To prevent such organisations illegitimately entering the EU interest representation space, **EPACA recommends that MEPs and their staff remain vigilant and always carry out due diligence on representatives of civil society**, just as they should do with private sector lobbyists:

- Check if the entity is listed in the EU Transparency Register
- Check the information provided regarding their membership and funding in the Register, or on the entity's website
- If in doubt, ask questions ahead of the meeting

Legitimate NGOs will have no difficulty in meeting their obligations under the EU Transparency Register and, if asked, will not hesitate to inform MEPs of their funding and management structures. Everyone deserves a voice in the policy discussion, but the policy discussion itself deserves honesty and transparency.

EPACA, the European Public Affairs Consultancies' Association, is the representative trade body for public affairs consultancies working with EU institutions and is dedicated to maintaining the highest standards of transparency in EU affairs lobbying.

For more information, please visit www.epaca.org