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NGO Lobbying on Trade and Investment

Accountability and
Transparency at the EU Level

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Summary¹

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Non-governmental organisations (NGOs) impact EU policymaking in many ways: through ideas, calls for specific policies and the empowerment of like-minded political parties. A large number of well-connected NGOs explicitly aim to influence trade and investment policymaking in the Union, which is to a large extent an exclusive EU competence. Some of the most influential NGOs that in the past have campaigned against stated EU trade and investment policy objectives have received substantial financial funding from the European Commission and national EU governments. Two reports commissioned by the European Parliament and one report prepared by the European Court of Auditors demonstrate that the EU's current transparency and accountability mechanisms are highly deficient. Information on grant levels, grant recipients and subcontractors is scarce and patchy. The information available does not allow for a meaningful, data-driven analysis of grant-funding procedures and conditionalities, or of contradictions between NGO activities and basic principles in EU policymaking, particularly the commitment to free trade and a strong transatlantic relationship. In addition to EU funding, many NGOs that have

¹ Although the author has made every effort to ensure the accurate reproduction of publicly available facts and figures, some organisations' names and identifying details may have changed since the beginning of this research. Some organisations' websites, including links to financial and/or transparency reports, may also have changed. The author encourages the reader to consult the organisations' websites and reports themselves.



campaigned against EU trade and investment policymaking receive financial funding from member state governments, with German federal ministries taking a central role. This paper calls on EU policymakers to ensure that NGOs financed by the EU do not fundamentally contradict the EU's basic principles.

Keywords Non-Governmental Organisations (NGOs) – Free Trade Agreements (FTAs) – Transatlantic Trade and Investment Partnership Agreement (TTIP) – Comprehensive Economic and Trade Agreement (CETA) – European Union – European People's Party (EPP) – Civil society – Lobbying – Public opinion

Introduction

Protectionist voices in the US and Europe did not need Donald Trump to make their case. The wave of calls against open markets and economic globalisation was already strong before Donald Trump ran his political campaigns against free trade, globalisation and the World Trade Organisation (WTO). In Europe political campaigns against trade and investment agreements were to a significant extent initiated by non-governmental organisations (NGOs), which are characterised by a variety of business models and various political interests.

With the rise of social media and online petition platforms, some influential NGOs have been aiming to create new legitimacy for protectionist policies at the EU and national levels. These policies threaten to erode the near consensus on economic liberalism that evolved in the 1980s and 1990s. At the same time, open markets and a strong transatlantic relationship are key principles in EU policymaking. These principles are supported particularly by mainstream liberal, centre-right and conservative parties, and do not stand in opposition to sound environmental and consumer protection policies. For these parties a strong civil society is also an indispensable ingredient for functioning democracies. For example, the European People's Party (EPP) has reconfirmed several times that 'civil society is crucial in a democracy' and that '[c]ivil society organisations must be allowed to work freely and [that the EPP] will always stand up to ensure that their rights are guaranteed.'² According to the party's Bucharest Platform of 2012, achieving the common good is the final objective of the EPP values of the dignity of human life, freedom, responsibility, equality, justice, truth, solidarity

² EPP, 'Civil Society Must Be Protected', Press release, Strasbourg, 8 February 2018; EPP, 'Manifesto', EPP Statutory Congress, held on 17–18 October 2012 in Bucharest, Romania.



and subsidiarity. A strong civil society is indispensable for the implementation of these values.³

It is apparent that the impact of NGOs on EU trade and investment policy-making has been growing for quite some time. Since the launch in 2013 of the negotiations for an EU–US Transatlantic Trade and Investment Partnership Agreement (TTIP), many NGOs have been actively campaigning against stated EU policy priorities. Unchallenged for a long time, their campaigns have been underpinned by commentary suggesting EU trade policymaking is the cause of growing inequality, social dislocation and environmental disasters. Even though these claims are usually exaggerated and often groundless, some very active and well-connected NGOs have managed to evoke, in the media and political arena, public hostility towards free trade, with significant repercussions on public opinion.

With the launch of TTIP negotiations in 2013, a number of long-established and well-connected German NGOs partnered with like-minded NGOs from other EU member states. Their network allowed them to achieve greater visibility on Europe's policy scene.⁴ More than 500 NGOs were informally organised in the European 'Stop TTIP and CETA' network, which was launched by German NGOs. The network campaigned through coordinated social media activities, paid online advertisements, online petitions and numerous blog posts. The objective was to undermine EU trade negotiations and the ratification procedures for free trade agreements (FTAs) between the EU and Singapore, Canada (the Comprehensive Economic and Trade Agreement, CETA) and Japan (EUJFTA).⁵ Many of the network's key NGOs received financial funding from the European Commission and/or EU member state governments. The conflict between the activities of EU-funded NGOs and key principles in EU policymaking raises important questions about the accountability of the European Commission and democratic control of public funding granted to NGOs.

The interests of EU- and member state-funded NGOs which campaign in the area of EU trade and investment policy are unlikely to correspond to the interests of all EU governments. Turning away from FTAs and sound investment policies could increase the imbalance between large and economically well-developed member states (such as Germany) and smaller ones that are in the process of catching

³ EPP, *Party Platform*, EPP Statutory Congress 17–18 October 2012, Bucharest, Romania, 3.

⁴ Many European NGOs are part of networks that operate at the EU level (e.g. the Civil Society Contact Group, which represents a total of 422 NGOs active in various areas of EU policy). See, e.g., D. Guéguen, *European Lobbying*, 2nd edn. (Brussels: Europolitics, 2007).

⁵ Stop TTIP Alliance, 'Rights for People: Rules for Corporations' (n. d.).



up economically. This means that NGO activities that fundamentally contradict stated EU principles in trade and investment policy could also negatively impact EU institutions' democratic legitimacy and accountability. Therefore, as concerns EU trade and investment policy, NGOs' activities should be scrutinised closely.

Focusing on trade and investment policy, this paper aims to raise awareness among policymakers of EU-funded NGOs whose activities significantly undermine the EU's stated values and political priorities. It will be argued that new legal mechanisms are needed to ensure that NGOs financed by the European Commission do not fundamentally contradict the EU's basic principles, particularly those related to free trade and the need for a strong transatlantic relationship.

The first section provides a brief overview of the taxonomy of NGOs in the context of EU policymaking and outlines common modes of lobbying targeted at EU policymakers. The second section examines the accountability and democratic control of EU-funded NGOs. This discussion is based on the findings of comprehensive reports commissioned by the European Parliament (EP) and the European Court of Auditors. The third section briefly presents two case studies featuring EU- and member state-funded NGOs which have been active in the European Stop TTIP and CETA movement. The final section concludes and provides policy recommendations.

NGOs: a taxonomy in the context of EU policymaking

The term 'NGO' is vague. The UN, for example, defines it as 'any non-profit, voluntary citizens' group which is organised on a local, national or international level.'⁶ The UN also states that NGOs are 'diverse' and 'heterogeneous' organisations, but also recognises that '[s]ome NGOs develop ongoing partnerships with governments and receive large amounts of government funding, raising questions of their independence.'⁷

⁶ United Nations, Civil Society Unit, 'Who We Are' (n. d.).

⁷ Global Policy Forum, 'The United Nations and Civil Society: Report of the Thirtieth UN Issues Conference' (1999).



EU institutions do not all apply the same definition of ‘NGO’. Frans Timmermans, the First Vice-President of the European Commission in the years 2014–19, stated that NGOs

present such a variety of legal forms in the legislation of the member states and of third countries that it makes it very difficult to encompass all relevant forms in a single definition. However, while there is no single definition of NGOs agreed at EU level, the Commission has established such definitions, for its own activities, in several horizontal sectors.⁸

As outlined by the EP’s 2016 report *Democratic Accountability and Budgetary Control of Non-Governmental Organisations Funded by the EU Budget*, several departments of the European Commission have established their own definition of NGOs or refer to national legislation when necessary. By contrast, according to the report, two common criteria are often applied in individual EU member states: the not-for-profit character and independence from government.⁹ A 2019 follow-up report, which was also commissioned by the Parliament, concludes that this situation ‘has not changed, i.e. there is no common legal definition [for NGOs] at the EU level, and the [European Commission] operates a pragmatic definition based on a number of key features (most prominently, non-profit character), with potential differences depending on the implementing [Directorate General], or even program.’¹⁰

Other organisations have developed different definitions for NGOs. The World Bank defines NGOs as ‘private organisations that pursue activities to relieve suffering, promote the interests of the poor, protect the environment, provide basic social services, or undertake community development’.¹¹ This broad definition encompasses a wider variety of organisations, including charities, research institutes and professional associations. This definition will be used in this paper.

⁸ F. Timmermans, ‘Answer Given by First Vice-President Timmermans on Behalf of the Commission’, European Parliament, Parliamentary Questions (7 June 2017).

⁹ European Parliament, Directorate General for Internal Policies, Policy Department D: Budgetary Affairs, *Democratic Accountability and Budgetary Control of Non-Governmental Organisations Funded by the EU Budget* (17 November 2016), 14.

¹⁰ European Parliament, Directorate General for Internal Policies, Policy Department D: Budgetary Affairs, *Democratic Accountability and Budgetary Control of Non-Governmental Organisations Financed from the EU Budget – Update* (21 January 2019), 20.

¹¹ C. Malena, *A Practical Guide to Operational Collaboration Between the World Bank and Non-Governmental Organizations*, World Bank, Operational Policy Department (1995).



How European NGOs impact EU policymaking

Many NGOs actively engage in contemporary debates about EU policymaking. It is often assumed that NGOs are legitimate representatives of civil society and that EU policymaking could be improved if NGOs were given a larger influence over policy formulation and development. At the same time, however, the democratic legitimacy of NGOs and their engagement as partners for governments and international institutions is also disputed.¹² NGOs often compete for donations, visibility and influence, and are often ‘as much a part of national and international politics as any other interest group.’¹³

Competition for donations can have an impact on the credibility of NGOs. On the one hand, some NGOs, particularly campaign NGOs, may have an incentive to misinform citizens and policymakers or to disseminate untruths to polarise public opinion. On the other hand, competition for long-term funding can also discipline NGOs. Many NGOs, for example those engaged in research, aim to inform policymakers on the basis of facts and empirical evidence. These NGOs generally seek to inform debates rather than polarise opinion.

Like other lobby groups, NGOs can pursue different strategies to impact legislative procedures and political decisions. The literature generally distinguishes between inside lobbying and outside lobbying. The characteristics of both forms of lobbying are depicted in Table 1. Inside lobbying activities focus on certain political actors and institutions. With respect to EU policymaking, inside lobbying is a typical feature of the legislative process as many institutions—for example, the European Commission, the EP and expert committees—invite NGOs and other stakeholders to provide opinion and expertise.

¹² See, e.g., T. Persson and K. Edholm, ‘Assessing the Effects of European Union Funding of Civil Society Organizations: Money for Nothing?’, *Journal of Common Market Studies* 56/3 (2017).

¹³ C. Tortajada, ‘Nongovernmental Organizations and Influence on Global Public Policy’, *Asia and the Pacific Policy Studies* 3/2 (2016), 1; F. Heylen, ‘Writing Blank Checks? How Government Funding Affects Interest Organisations’ Advocacy Behaviour in a Multi-layered Context’, *Journal of European Public Policy* 7/4 (2018).



Table 1 Modes of lobbying activities

INSIDE LOBBYING	OUTSIDE LOBBYING
Addressed to political actors and institutions.	Addressed to wider audiences and even to the public at large.
Takes place in the political sphere and generally in closed settings.	Takes place in the public sphere, in open settings.
Includes discussions with advisory bodies, technical committees, agencies and parliamentary committees as well as contacting and engaging with political actors and institutions.	Includes media campaigns, protests, press releases and press conferences as well as engaging with reporters, journalists and editors.
Direct influence on policies.	Indirect influence on policies.
Direct transmission of information from interest groups to policymakers.	Indirect transmission of information from interest groups to policymakers.

Source: L. Martini, 'Non-Governmental Organisations and Lobbying Strategies on EU Trade Policy', Dissertation, University of Limerick, 2017.

Inside lobbying activities by NGOs

Article 11 of the Lisbon Treaty stipulates that European ‘institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action.’¹⁴ Article 11 also states, ‘The institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society.’

In practice, many NGOs interact with the EU institutions as a network representing local and national organisations through several formal and informal channels. Some NGOs focus on influencing political decision-makers with key roles in law-making processes, for example, formal rapporteurs reporting on the proceedings of committee meetings. Many NGOs also actively engage in public consultations, while some are privileged members of closed policy expert committees.

¹⁴ Article 71 of the UN Charter: ‘The Economic and Social Council may make suitable arrangements for consultation with non-governmental organizations which are concerned with matters within its competence. Such arrangements may be made with international organizations and, where appropriate, with national organizations after consultation with the Member of the United Nations concerned.’



It is the European Commission and the EP, rather than the Council, that are the main targets of NGOs' lobbying activities.¹⁵ The European Commission is of particular interest to NGOs since it initiates and revises all EU legislation. The Commission is generally the first place for influencing the details of legislative proposals. At the same time, many scholars argue that the Commission is the institution which is most in need of expertise and that it requires information on the concerns of European stakeholders to strengthen its legitimacy.¹⁶ The Commission therefore engages with NGOs through formal and informal channels. Expert groups, for example, host representatives of civil society, including representatives of NGOs, academia and labour unions. In the Expert Group on EU Trade Agreements, for example, several NGOs have been long-standing members, including the European Consumer Organisation, ClientEarth and the European NGO Confederation of Relief and Development (CONCORD Europe).¹⁷ There are still other ways in which NGOs can engage with EU institutions (see Table 2).

¹⁵ The Council is generally much less accessible for NGOs. NGOs do not have access to Working Groups, and getting information is difficult. In addition, the Permanent Representations of member state governments take their instructions directly from their national governments. Many civil society organisations have a voice in the European Economic and Social Committee (EESC), which is comprised of employers (Group I), workers (Group II) and a diverse group made up of farmers, professionals, consumers and others (Group III). The EESC is an advisory institution. It informs the EU institutions about the opinions of the representatives of various economic and social activities. Scholars argue that the EESC could be a good forum for dialogue between civil society and EU institutions. Even though consulting the EESC is mandatory in several areas, its opinions are not binding, which limits its sphere of operations.

¹⁶ P. Bouwen, 'Corporate Lobbying in the European Union: The Logic of Access', *Journal of European Public Policy* 9/3 (2002).

¹⁷ European Commission, 'Expert Group on EU Trade Agreement (E03556): List of Members' (2017).



Table 2 Inside lobbying activities of NGOs targeted at EU institutions

INSIDE LOBBYING PRACTICE	DESCRIPTION AND EXAMPLES
Participation in European Commission consultations	Consultations regarding legislative proposals. Consultations can be targeted, i.e. open to those who the Commission has invited to respond, or open public consultations, i.e. open to everyone. Open consultations are popular with many NGOs as these organisations can express recommendations and concerns on specific topics directly to the Commission. ¹⁸
Participation in structured dialogue organised by the European Commission	Examples include the Civil Society Dialogue and formal working groups. Directorate General (DG) Trade, e.g., frequently organises civil society dialogue forums in which NGOs, labour unions, business representatives and other stakeholders can share their views on specific issues with Commission representatives. ¹⁹
Ad hoc interaction with European Commission officials	NGOs directly contact a DG when they want to have particular issues addressed. ²⁰ DGs themselves also organise regular meetings with NGOs ('ad hoc meetings'), outside the formal structure of expert groups. ²¹
Ad hoc interactions with Members of the European Parliament (MEPs)	During the legislative process, NGOs engage directly with particular MEPs: rapporteurs, shadow rapporteurs, committee chairs, the assistants of the committee secretariat or group officials. MEPs are considered 'the main gatekeeper in forming the opinion of the Parliament.' ²²
Participation in EP Intergroups	NGOs can also impact legislative proceedings through their participation in Intergroups. NGOs can provide coordinators or the secretariat for such groups and can influence policymaking by setting agendas and designating speakers. They can also facilitate the creation of EP written declarations, since through Intergroups they can pressure MEPs to sign declarations. ²³

¹⁸ Global Policy Forum, 'The United Nations and Civil Society'.

¹⁹ This is an example of a civil society dialogue which includes NGOs as participating members (e.g. Friends of the Earth Europe and Transport and Environment).

²⁰ Global Policy Forum, 'The United Nations and Civil Society'.

²¹ European Commission, 'The Commission and Non-Governmental Organisations: Building a Stronger Partnership,' Discussion Paper, COM (2000) 0011 final (January 2000).

²² D. Coen and J. Richardson, *Lobbying the European Union: Institutions, Actors and Issues* (Oxford: Oxford University Press, 2009).

²³ Ibid. Intergroups can be formed by members from any political group and any committee, with a view to holding informal exchanges of views on particular subjects and promoting contact between members and civil society. See European Parliament, 'The Intergroups of the European Parliament' (n. d.).



Inside lobbying and the EU's Transparency Register

Under the 'Agreement between the European Parliament and the European Commission on the transparency register',²⁴ organisations aiming to influence 'the formulation or implementation of policy and the decision-making processes of the EU institutions' have to register by submitting information to the European Transparency Register. Registration is needed before access to the EP or the European Commission can be granted. Since 2011 the Parliament and the Commission have jointly operated this register, which was initially intended to make interactions between private interests and public officials more transparent. As concerns information on EU and national public funding provided to NGOs, the register does not provide detailed breakdowns.²⁵ The Council has only been an observer to this arrangement, starting in 2014. Representatives of the Parliament, the Council and the Commission are currently attempting to improve the register with a view to further increasing the transparency and accountability of the EU policymaking process.²⁶

Information on meetings with European Commission officials and the number of access badges for the EP are also provided by the Transparency Register. According to data provided by Transparency International, most NGOs that actively interact with European Commission officials advocate mainly in three areas: health, climate, and energy and the environment.²⁷ The assessment is based on the number of contacts that NGOs have with the Directorate Generals (DGs) of the European Commission.²⁸ The data also illustrate that, like representatives of businesses and business associations, representatives of NGOs engage substantially with high-level representatives of the European Commission (Figure 1).

²⁴ European Parliament and the European Commission, 'Agreement between the European Parliament and the European Commission on the establishment of a transparency register for organisations and self-employed individuals engaged in EU policy-making and policy implementation', OJ L 191/29 (22 July 2011), art. 8.

²⁵ M. Jenkins, 'Defining Lobbyists and Regulation Lobbying in Europe', Transparency International (2017).

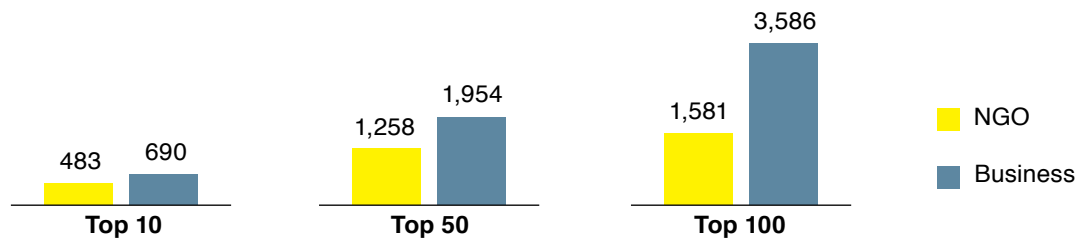
²⁶ European Parliament, 'Negotiations Begin on a Mandatory Transparency Register for the Three EU Institutions', Press release (17 April 2018).

²⁷ See also European Parliament, *Democratic Accountability and Budgetary Control of Non-Governmental Organisations Funded by the EU Budget*.

²⁸ Ibid.



Figure 1 Number of high-level lobbying meetings between NGOs and the European Commission, December 2014 to 25 October 2018^a

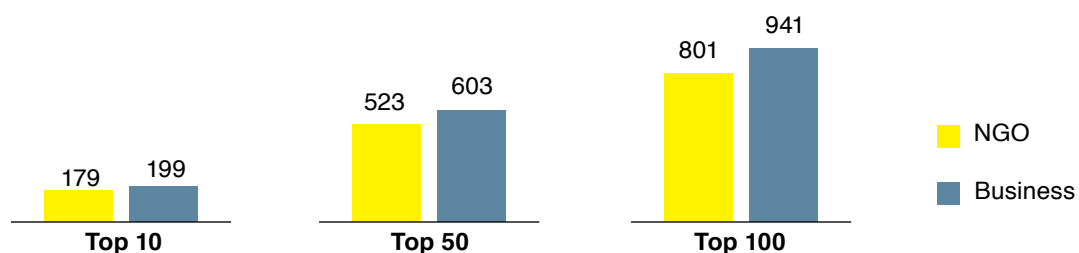


Source: Transparency International's EU Integrity Watch database based on data of the EU Transparency Register. Top 10, Top 50 and Top 100 by total number of EP badges. Transparency International EU's 'Integrity Watch' database is available at <https://www.integritywatch.eu/>.

^a 'Top 10/50/100' refers to the organisations/businesses that had the 10/50/100 highest numbers of lobbying meetings with the Commission, as measured by total number of EP badges.

Many NGOs active in Brussels have a high number of access badges to the EP (Figure 2).²⁹ While the number of badges is not a good proxy for actual political influence on Members of the European Parliament (MEPs), it can serve as an indication of NGOs' potential influence, particularly when compared to other interest groups. The number of NGOs' badges amounts to about 90% of those held by individual businesses and business associations (Figure 3). Even though the true extent of advocacy activities in the EP is hard to assess from an outsider's perspective, these numbers indicate that many NGOs have considerable access to EP decision-makers, such as rapporteurs, shadow rapporteurs, individual MEPs and assistants to MEPs.

Figure 2 Number of access badges to the EP, as of 25 October 2018^a



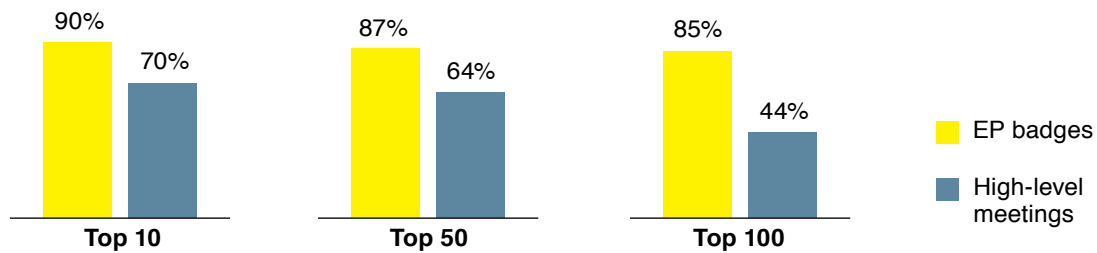
Source: See the source note to Figure 1.

^a 'Top 10/50/100' refers to the organisations/businesses that had the 10/50/100 highest numbers of access badges to the EP, as measured by total number of EP badges.

²⁹ Indeed, many badge holders use their badges to get access to the EP's canteen.



Figure 3 Number of NGO badges/meetings as percentage of number of business (associations) badges/meetings, December 2014 to 18 October 2018^a



Source: See the source note to Figure 1.

^a 'Top 10/50/100' refers to the organisations/businesses that had the 10/50/100 highest numbers of lobbying meetings with the Commission, as measured by total number of EP badges.

Transparency International also provides data on lobbying expenses. This data is also taken from the Transparency Register. Table 3 lists the 10 NGOs that had the largest number of meetings with high-level representatives of the European Commission between December 2014 and 18 October 2018. These NGOs' annual lobbying expenses range from €500,000 (European Climate Foundation) to €3,250,000 (European Environmental Bureau). The data also shows that 8 of the 10 NGOs also had the highest number of access badges for the EP. Seven of the 10 most active NGOs receive substantial financial funding from the European Commission (see Table 3).

Many of these NGOs actively engage in advocacy activities that target EU trade and investment policy. Among those NGOs that engaged most in lobbying activities directed at European Commission officials are the European Bureau of Consumers' Unions, Greenpeace, the European Environmental Bureau (EEB), Friends of the Earth and Oxfam. All these organisations are known to have advocated against TTIP and CETA. They are part of larger NGO networks, which operate at various levels and work on different themes in EU policymaking.

These networks host, in addition to Brussels-based NGOs, a high number of self-declared anti-TTIP and anti-CETA campaign NGOs from Germany, such as Deutscher Naturschutzring (DNR, a board member of the EEB), Grüne Liga (a member of the EEB), Bund für Umwelt und Naturschutz Deutschland (BUND; a member of the EEB and Friends of the Earth), WWF Germany and Greenpeace Germany.

Most of these organisations receive substantial financial funding from the EU and member state governments. Many of them also engage in a large number of European Commission expert groups. For example, according to the Trans-



parency Register, the EEB received €899,491 in funding from the European Commission’s DG Environment in 2016 (according to the most up-to-date data, from 27 February 2019). It is also noteworthy that many of these NGOs, including WWF Germany, receive substantial public funding from German ministries (see Section 5). In February 2019 the EEB had membership in 34 European Commission expert groups, including the Transatlantic Trade and Investment Partnership Stakeholder Advisory Group.

Figure 3 Number of NGO badges/meetings as percentage of number of business (associations) badges/meetings, December 2014 to 18 October 2018^a

Rank	NGO	Meetings	Badges ^a	Lobbyists ^b	Lobbying expenses ^c	EU funding	Policy and advocacy areas
1	Bureau Européen des Unions de Consommateurs	143	30	26	€2,250,000	Yes. For financial year 2017: €1,400,000 grant for European Consumer Organisation, €1,006,717 for Consumer Champion project, Consumer Law Ready project, Ecodesign project and Ecolabel project.	Food, trade (TTIP), safety (chemicals), energy and investment
2	Transport and Environment (European Federation for Transport and Environment)	110	18	16	€1,000,000	Yes. For financial year 2017: €513,069 from the European Commission.	Transport, environment



Rank	NGO	Meetings	Badges ^a	Lobb- yists ^b	Lobbying expenses ^c	EU funding	Policy and ad- vocacy areas
3	WWF Euro- pean Policy Programme (WWF EPO)	102	13	22	€2m	Yes. For financial year July 2016 – June 2017: €816,779 European Commission LIFE NGO operating grant, LIFE+ Climate action grant, H2020 Energy Efficiency. WWF's national chapters received additional EU funding.	Energy, environment, trade
4	Greenpeace European Unit (Green- peace)	88	14	7	€606,532	No	Agriculture, climate change, environment
5	European Environ- mental Bureau (EEB)	74	11	20	€3.25m	Yes. For financial year 2016: €899,491 from European Commission, DG Environment.	Environment, sustainable development
6	Climate Action Network Europe	72	9	13	€1m	Yes. For financial year 2017: €345,899 from European Commission.	Climate, energy, finance
7	European Climate Foundation	68	5	4	€500,000	No	Climate, energy and other policies
8	Oxfam	64	10	12	€900,000	In financial year Jan.–Dec. 2016 Oxfam-Solidarité received €3,232,563 from European Commission, DG ECHO.	Food security, climate change, development policy and finance, and the provision of humanitarian assistance



Rank	NGO	Meetings	Badges ^a	Lobbyists ^b	Lobbying expenses ^c	EU funding	Policy and advocacy areas
9	Open Society European Policy Institute	59	11	19	€1.5m	No	Democratic standards, human rights, equality and antidiscrimination, migration and asylum, and transparency and accountability
10	Friends of the Earth Europe	55	14	6	€744,943	Yes. For financial year 2017: €2,468,218 from DG Environment operating grant, DG Dev School of Sustainability, DG Enlargement Western Balkans, Erasmus (via Friends of the Earth). Several member organisations received additional EU and member state funding.	Climate and energy, corporate accountability, finance, nature and food, and resource use

Source: Information on the number of badges, number of lobbyists and lobbying expenses was taken on 18 October 2018 from Transparency International's EU Integrity Watch. Information on EU funding is from 5 March 2019.

^a Refers to the number of access badges to the EP that the organisation held for its lobbyists on 18 October 2018, as declared by the organisation in the EU Transparency Register.

^b Refers to the number of lobbyists (in full-time equivalent) on 18 October 2018, as declared by the organisation in the EU Transparency Register.

^c Refers to the annual lobby budget as of 18 October 2018, as declared by the organisation in the EU Transparency Register under 'Estimate of the annual costs related to activities covered by the register'. Figures for total lobbying budgets refer mainly to the financial year 2017. According to the official guidelines, estimates should include staff costs; office, administrative and operational expenses; costs for outsourced activities and membership; and other relevant costs.



Outside lobbying

Over the past 10 years, there has been a significant increase in the use of outside lobbying activities, including advocacy campaigns in the area of EU trade policy. This is partly because of the limitations many NGOs face when directly lobbying EU institutions and political decision-makers:

- The channels of communication with EU institutions are often difficult to identify. Thus small NGOs often find it challenging to gain access to certain decision-makers (e.g. decision-makers in the Council).
- Even though some NGOs may get access to institutions, in most cases their views are relegated to the advisory level and are not taken into account at the decision-making stage.
- Consultations are often considered superficial because responses may not be processed in the right way due to the lack of time, resources and the large number of consultations that the Commission holds.³⁰

For many NGOs, being part of a larger advocacy and campaign network may therefore be the only way to get heard. In the EU, NGO campaign activities have been particularly pronounced in a number of policy fields, such as consumer protection (related to, e.g., tobacco products and products containing glyphosate and genetically modified organisms (GMOs)), environmental regulations (related to, inter alia, carbon emissions, fossil fuels and renewable energies), digital rights (concerning privacy, copyrights, etc.), immigration and, as indicated above, EU trade policy (e.g. TTIP and CETA). In all these areas, the positions voiced by NGOs have often triggered controversies and polarised political debates.

With the rise of the Internet, there has been a substantial increase in both the outreach and impact of NGOs, and more specifically, their impact on public opinion.³¹ As a result, media representatives, journalists and politicians have lost the privilege of being either the echo chambers or gate-keepers of political agendas and political projects.³² Many NGOs now have their own communication departments. Their campaigns are targeted at either European institutions or the media and the general public. In the area

³⁰ J. Hainsworth, 'How NGOs Lobby the EU', POLITICO's EU Confidential Podcast (2018).

³¹ See, e.g., K. Kaur, 'Social Media Creating Digital Environmental Publics: Case of Lynas Malaysia', *Public Relations Review* 41/2 (2014); G. von Nordheim, 'Digital Traces in Context: Reuniting a Divided Public? Tracing the TTIP Debate on Twitter and in Traditional Media', *International Journal of Communication* 12 (2018), 548–69.

³² M. Baum and T. Groeling, 'New Media and the Polarization of American Political Discourse', *Political Communication* 25/4 (2008).



of EU trade and investment policy, NGOs typically organise campaigns on particular issues, such as GMOs, environmental legislation and investment protection. Many NGOs have also organised and taken part in demonstrations and petitions, and in public events with MEPs, Commissioners and member state representatives.

Accountability for and democratic control of EU funding granted to NGOs

Contrary to the conventional wisdom that NGOs do not have formal or financial affiliations with governments, a substantial number of influential NGOs receive funding from national governments and supranational institutions like the EU (see Table 3). Several reports demonstrate, however, that the terms of conditionality for public funds and accountability differ widely. Even though NGOs usually have to report back to grant givers, the availability of public funding is usually not conditional upon specific or harmonised institutional characteristics such as statutes, objectives and operational working practices. At the same time, public institutions' awarding practices are usually not open to public scrutiny.³³ Partly in response to these concerns, in 2015 the British government implemented policies ensuring that public grants made to NGOs and other grantees cannot be spent on activities that could influence or attempt to influence the British Parliament, government or political parties.³⁴

A comprehensive case study from 2016 shows that a large number of European anti-TTIP, anti-CETA NGOs received financial grants directly and indirectly from governments and governmental institutions, including the European Commission's DG International Cooperation and Development (DEVCO).³⁵ The study shows that a significant proportion of these NGO grantees coordinated or engaged in campaign activities against the negotiations for TTIP and CETA. And this is just

³³ European Parliament, *Democratic Accountability and Budgetary Control of Non-Governmental Organisations Funded by the EU Budget*; European Parliament, *Democratic Accountability and Budgetary Control of Non-Governmental Organisations Financed from the EU Budget – Update*; European Court of Auditors, *Transparency of EU Funds Implemented by NGOs: More Effort Needed*, Special report no. 35 (18 December 2018).

³⁴ UK Ministry of Housing, Communities & Local Government, 'Eric Pickles Cracks Down on Wasteful Spending of Government Lobbying Government', *gov.uk*, 23 February 2015.

³⁵ M. Bauer, *Manufacturing Discontent: The Rise to Power of Anti-TTIP Groups*, European Centre for International Political Economy, Occasional Paper no. 2 (Brussels, 2016).



to say that they were involved in campaigns that stood in opposition to the stated political objectives of the donor governments and associated governmental organisations, for example, the trade policy of the EU.

In November 2017 the EP published a report that had been requested by the Parliament's Committee on Budgetary Control. This document came to be known as the 'Pieper Report'.³⁶ The intention was to subsequently adopt an EP resolution based on the findings of the study. Addressing the issue of EU funding granted to NGOs, the study concludes, 'The existence of multiple, complex, overlapping NGO networks presents significant challenges to accountability and transparency, as does the emergence of new and innovative funding mechanisms that do not involve large institutional donors'.³⁷ The authors strongly criticise the '[f]inancing of [NGOs] from the EU budget', a criticism that extends to organisations engaged in the area of trade and investment policy.³⁸ The major findings of the Pieper Report are summarised in the following:

- A great number of influential NGOs receive financial funding from the EU and national governments. It is impossible to identify the top 50 NGO recipients of European Commission funding using existing, publicly available databases. The EU's Financial Transparency System³⁹ gives no indication of how individual grants are divided between the multiple beneficiaries listed for each grant. Moreover, it provides no information about actual disbursements, for example, to NGO subcontractors, that is, NGOs that have been hired for activities related to the facilitation of EU-funded projects.
- Different European Commission departments employ different grant recording systems, which use different definitions and data formats. Any comparative analysis is therefore difficult to conduct. According to the Pieper Report, the most reliable data can be obtained from the DG Budget, which uses a specific definition of NGOs.⁴⁰ According to this data, the European Commission granted €610 million to a total of 28 NGOs in 2015.

³⁶ This report was requested by the European Parliament's Committee on Budgetary Control. It designated Markus Pieper, MEP (EPP) to keep the committee informed about the study.

³⁷ European Parliament, *Democratic Accountability and Budgetary Control of Non-Governmental Organisations Funded by the EU Budget*, 3.

³⁸ Ibid.

³⁹ The Financial Transparency System is a tool used for tracking financial commitments made by grant awarding bodies.

⁴⁰ 'Any non-profit, non-public law body independent of public authorities, political parties and commercial organisations'.



- The Pieper Report is also critical of the EU's Transparency Register, which it considers merely a 'voluntary system of registration for entities seeking to directly or indirectly influence EU decision-making'.⁴¹ As it is a voluntary system, some large NGO recipients and NGO networks are not registered in the Transparency Register. For example, the Seattle to Brussels Network has served as the coordination centre for large anti-globalisation campaign NGOs since 2013, but it only registered with the Transparency Register in January 2016.
- With regard to EU funding, the Transparency Register shows discrepancies in the data available in terms of the financial year, the origin of the grant and the amount. There is no verification process for information submitted by NGOs or other lobbying organisations. For example, the anti-globalisation NGO attac, a founding member of the Seattle to Brussels Network, is still highly active in campaigning against EU trade and investment agreements. The Transparency Register does not list attac as being, or having been, in receipt of EU funding. However, it does list eight organisations that are either national chapters of or NGOs associated with attac.

Subsequent calls from Markus Pieper, MEP (EPP) for funding restrictions on organisations which 'disseminate untruths' were pushed back by Green and Socialist MEPs. Green MEP Bart Staes, for example, stated, 'We will as Greens try to kill this report as soon as possible', noting that the European Commission had taken a view similar to that of the Greens.⁴² Moreover, the Pieper Report became publicly associated with Hungarian Prime Minister Viktor Orbán's steps to contain and ban certain NGOs from operating in Hungary. There were accusations that the text had been 'masterminded in Budapest', and as a result many MEPs voted against the draft resolution.⁴³ It should be noted, however, that the purpose of the Pieper Report was by no means to support or mimic the NGO policies of the Hungarian government. Moreover, the aim was never to promote the idea of banning NGOs from operating in the EU.

Even though the resolution was not adopted by the EP, the lack of MEPs' support does not negate the findings of the report. On the contrary, in 2018 the

⁴¹ European Parliament and the European Commission, 'Agreement between the European Parliament and the European Commission on the establishment of a transparency register', Article 7.

⁴² H. Cooper and Q. Aries, 'Politico Brussels Influence: Commission Sides with Greens on NGO Funding – How to Lobby (and How Not To)', *Politico EU Influence*, 21 April 2017.

⁴³ S. Michalopoulos, 'Orbán "Killed" Parliament Motion Seeking to Block EU Funding for NGOs', *Euractiv*, 12 May 2017.



European Court of Auditors came to very similar conclusions.⁴⁴ They found that information on EU grants to NGOs is published in several patchy systems and that only a limited amount of this information is disclosed. They also argued that the Commission does not provide comprehensive information on EU grants to NGOs, particularly those organisations operating in or with networks of international NGOs.

Moreover, a 2019 follow-up report on the democratic accountability and budgetary control of NGOs (the Schmidt Report)⁴⁵ concludes that it is impossible to identify the 50 top NGO recipients of European Commission funding on the basis of existing, publicly available databases, such as the Financial Transparency System. The authors also find that the systems operated by the European Commission still do not allow accurate analysis of funding allocated to individual NGOs. Furthermore, the information does not permit a meaningful analysis to be carried out of the redistribution of public grants between NGO consortium partners, that is, within NGO networks. With regard to NGO networks in particular, the report criticises the fact that it is often difficult to identify which organisations in a network are undertaking which activities, and how funds flow between the different groups.

Case studies

One of the most comprehensive studies on outside lobbying activities in the area of EU trade and investment policy was conducted by Matthias Bauer (the author of this paper) on behalf of the European Centre for International Political Economy (ECIPE) in 2016.⁴⁶ The analysis is unique in that it is based on an unprecedented amount of data on the NGOs most active in campaigns against CETA and TTIP. This data includes financial information and comes from campaigns conducted both offline and on the social media. The findings of the ECIPE report are of importance for the current study because many of the NGOs that launched the original pan-European Stop TTIP, Stop CETA campaign receive financial funding

⁴⁴ European Court of Auditors, *Transparency of EU Funds Implemented by NGOs*.

⁴⁵ European Parliament, *Democratic Accountability and Budgetary Control of Non-governmental Organisations Financed from the EU Budget – Update*. This report was requested by the EP's Committee on Budgetary Control. It designated Claudia Schmidt, MEP (EPP) to take up the conclusions of the study. This report aimed to answer the following questions: (1) Which NGOs are most influential in policymaking in the EU through engagement with European institutions? (2) Which NGOs receive the most grant funding from the European Commission? (3) To what extent do 'big NGO players' comply with rules, regulations and standards? (4) What is the degree of transparency and accountability in the NGO sector?

⁴⁶ Bauer, *Manufacturing Discontent*.



from the European Commission and German federal ministries, yet at the same time undermine the stated political objectives of the EU and Germany's federal government. Since 2017 most of these NGOs have been operating under different names, a move that was linked to renewed attempts to expand their influence with European policymakers ahead of the 2019 European elections.⁴⁷

The first case study sheds greater light on EU funding provided to a network of NGOs that campaigned against stated EU trade and investment policy objectives. The second case study focuses on funding provided by German ministries to NGOs that now constitute Germany's revamped anti-EU trade policy network.

Case study 1: European Commission funding of anti-TTIP, anti-CETA NGOs

The European Commission's DG TRADE began negotiating CETA in 2009 and TTIP in 2013. In 2013 the European Commission's DG DEVCO (commonly known as 'EuropeAid') launched an advocacy project in the area of trade and investment policy. In connection with this project, it provided financial funding to a large group of European organisations that openly declared themselves to be opposed to TTIP and CETA.

One recipient of direct EU funding was the Transnational Institute (TNI), an Amsterdam-based research and advocacy institute committed to building a 'just, democratic and sustainable planet.'⁴⁸ According to the TNI, '[i]n 2013, funds were received for three different projects, two of which continued into 2014. Respectively, these concerned awareness-raising in Europe about (i) EU trade policy and the Millennium Development Goals, (ii) [I]and grabbing in the Global South and (iii) the impact of EU investment policy and investor protection on the Global South. The total amounts received from [the European Commission] DG DEVCO were €476,274 in 2013 and €510,663 in 2014. The balance of EU funds were received from DG Justice [and] Home Affairs for a separate project concerned with European drugs policy⁴⁹.

⁴⁷ 'Network for Justice in Global Trade' is the translation of the German term 'Netzwerk Gerechter Welthandel', i.e. the name of the network that has succeeded Germany's original Stop TTIP, Stop CETA initiative, which is also known as TTIPunfairhandelbar. The Internet domain of the new network is owned by the German NGO Forum on Environment and Development (in German: Forum Umwelt und Entwicklung). According to the Internet Corporation for Assigned Names and Number (ICANN), the domain was first created on 2 March 2017.

⁴⁸ See the information provided on the website of TNI.

⁴⁹ This information was emailed by the TNI to the Martens Centre on 25 November 2019.



DG DEVCO and the TNI agreed on certain ‘expected results’. This included the following:⁵⁰

- ensuring that three million EU citizens become aware of the link between investment and development,
- targeting MEPs and MEP candidates for the 2014 EP elections,
- encouraging 200 policymakers to call for a revision of EU investment policy,
- ensuring that 600 civil society organisations were exposed to the project’s messages, and
- ensuring that 200 civil society organisations engaged in ‘e-actions’ (i.e. online campaigns and petitions).

Susan George, the President of TNI’s board and the author of the book *How to Win the Class War*, has institutional affiliations with some of the EU’s most influential anti-TTIP, anti-CETA NGOs.⁵¹ George previously served on the boards of Greenpeace International and Greenpeace France. She is also Honorary President of attac France, one of the most influential anti-globalisation campaign organisations, and a member of attac’s ‘scientific council’.⁵² In December 2014 George made the opening statement at a conference for anti-TTIP, anti-CETA stakeholders at the EP (a conference that was organised by the Group of the European United Left–Nordic Green Left in the European Parliament and, accordingly, funded by EU money).⁵³ That the work of the TNI is not free from ideologically entrenched views about economic and social policymaking is clear from George’s statement itself: ‘TTIP is a very dangerous animal. It is an animal that does not deserve to be on the list of protected species . . . [and] that has to be refused absolutely and entirely.’⁵⁴ At that time, however, the text of the trade agreement had not yet been drafted.

⁵⁰ This information was extracted from an official ‘concept note’ outlining the objectives agreed between the European Commission’s DG DEVCO and the TNI for the project Making EU Investment Policy Work for Sustainable Development. The concept note was sent to the author by Unit DEVCO.B.2 on 27 October 2016.

⁵¹ Transnational Institute, ‘Susan George: President’ (bibliographical information) (n. d.).

⁵² Transnational Institute, ‘Susan George: TNI Biography’ (n. d.).

⁵³ Transnational Institute, ‘For a Citizen’s Trade Agenda: Stop TTIP, CETA, TISA’ (n. d.).

⁵⁴ S. George, ‘Keynote Speech’, made at the conference ‘Stop TTIP, CETA, TISA – For a Citizens’ Trade Agenda’, Brussels, 9 December 2014. Information on the conference’s speakers (mostly left and green MEPs and activists) is available at Bilaterals.org, ‘Conference: For a Citizen’s Trade Agenda: STOP TTIP, CETA, TISA’, 2 December 2014.



In its campaign work, the TNI worked together with many self-declared anti-TTIP campaign organisations.⁵⁵ These are

- Seattle to Brussels network
- Aitec, France
- Attac France
- Attac Austria
- Both ENDS, Netherlands
- Le Centre National de Coopération au Développement (CNCD),
- 11.11.11., Belgium
- Chamber of Labour (Vienna), Austria
- Corporate Europe Observatory, Belgium
- Fairwatch, Italy
- France America Latina, France⁵⁶
- Institute of Global Responsibility, Poland
- Milieudefensie, the Netherlands
- Oficina Internacional de los Derechos Humanos Acción Colombia (OIDHACO), Colombia
- Powershift, Germany
- Re-Common, Italy
- Stop TTIP, Italy
- Vedegylet Egyesület, Hungary
- SOMO, Netherlands
- Foodwatch, Netherlands
- ASEED, Netherlands

⁵⁵ Transnational Institute, 'Annual Report of the Transnational Institute of 2015' (n. d.).

⁵⁶ According to our research, this is not a self-declared anti-TTIP organisation.



- Vrijschrift, Netherlands
- Platform Authentieke Journalistiek, Netherlands
- Ecologistas en Acción, Spain
- Global Justice Now, UK
- Rosa Luxemburg Foundation, Brussels office.

According to the EU's Transparency Register data from 6 October 2016, most of these organisations did not receive public funding from the European Commission in 2015 and 2016. This also concerned the financial year 2015. With regard to the TNI, up until September 2016 (the time the 2016 ECIPE report was completed) only very rudimentary information was available on the organisation's website and in its annual and financial reports. According to the TNI's annual reports of 2013 and 2014, financial grants received from the EU Commission accounted for 25% of the institute's annual income in 2013 and 2014 (about €2.9 million) and 24% in 2015 (€3.8 million).⁵⁷ Grant information provided in the TNI's audited financial report for 2015, which was only published in September 2016, was scarce with respect to the precise sources of EU funding. It only mentioned vague abbreviations such as 'EU DEAR' and 'EU Drug Prevention and Information Programme'. It did not mention the relevant grant-making Directorates-General of the European Commission⁵⁸. Although the TNI had already published its annual report for 2015, it did not report the institutional origins of its funding for the financial year 2016. Similarly, as of November 2016, 2014 was the latest year for which data was available for the TNI in the EU's Transparency Register. It appears that after 2016, the TNI started publishing more detailed financial accounts, and these are available on the organisation's website. It should be noted that the organisation also received funding from the Dutch government, which accounted for 42% of the TNI's annual budget for 2013 and 35% of its 2014 budget.

Case study 2: funding provided by the German government

Most of the Stop TTIP, Stop CETA campaigns were conceived by German NGOs, which have been at the heart of the network. For example, they coordinated the Brussels-based Seattle to Brussels Network. German NGOs also cooperated

⁵⁷ Transnational Institute, 'Annual Report of the Transnational Institute of 2013' (n. d.) and Transnational Institute, 'Annual Report of the Transnational Institute of 2014' (n. d.).

⁵⁸ Transnational Institute, audited annual/financial report of 2015, 15 September 2016, 7. According to email communication with the TNI from 25 November 2019, TNI 'has been awarded a 5-Star Transparency rating by Transparify'.



with those NGOs that were coordinated by the Amsterdam-based TNI (see Case Study 1). Their achievements were significant: one-quarter of all the NGOs that were members of Stop TTIP, Stop CETA were and still are headquartered in Germany, while 48% of all signatures in support of the European citizens' initiative against TTIP and CETA were collected in Germany.

German NGOs continue to take centre stage in campaigning against the negotiations on and ratifications of EU trade and investment agreements. On 1 August 2018, 59 organisations were listed as official members of the Justice in Global Trade Network (Netzwerk Gerechter Welthandel), a successor to the original Stop TTIP, Stop CETA campaign. According to its declaration from June 2018,⁵⁹ the campaign network aimed to

- stop the ratification of CETA,
- lobby the German government, the German Bundestag and the EP to reject 'neo-liberal' trade agreements such as the EU–Mercosur FTA, the EU–Japan FTA, the EU–Mexico FTA and Economic Partnership Agreements (EPAs) with African countries,
- lobby the German government, the German Bundestag and the EP to reject any 'TTIP-lite' agreement.⁶⁰

As concerns campaign activities, the German network aimed to

- intervene in the European elections by launching EU-wide campaigns against dispute-settlement clauses in trade agreements,
- call on European election candidates to reject 'neo-liberal' trade agreements and investment courts.⁶¹

The group currently consists of 13 environmental NGOs, 4 development aid organisations, 15 NGOs working on topics related to food and agriculture, 5 Christian groups, 2 labour unions, 3 business associations and 17 NGOs that work in various areas, such as supporting the organisation of campaigns and petitions (e.g. SumOfUs and Campact), anti-globalisation campaigning (e.g. attac Germany), the promotion of different forms of direct democracy (e.g. Mehr

⁵⁹ Netzwerk Gerechter Welthandel, 'Abschlussklärung der Strategie- und Aktionskonferenz des Netzwerks Gerechter Welthandel', Final declaration of a conference held in Frankfurt on 15–16 June 2018.

⁶⁰ For more detailed information on the network's demands, see Netzwerk Gerechter Welthandel, 'Zehn Forderungen zur Handelspolitik' (December 2017).

⁶¹ For more detailed information on the network's campaign activities, see Netzwerk Gerechter Welthandel, 'Abschlussklärung der Strategie- und Aktionskonferenz'.



Demokratie) and the promotion of transparency in policymaking (e.g. Powershift Germany; see the Appendix).

It is difficult, often impossible, to obtain detailed information about NGOs' sources of funding, their budgets or how funds have been spent. Often only aggregate figures are available. This holds for many NGOs that receive funding from the EU or national governments. However, publicly available information does point to certain general patterns.

As outlined by Table 4, two German ministries stand out as grant donors to many of the network's NGOs: the Federal Ministry for Economic Cooperation and Development (Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung, BMZ) and the Federal Ministry for the Environment (Bundesministerium für Umwelt, Naturschutz und nukleare Sicherheit, BMU). Publicly available data reveals that at least 11 members of the new network receive direct funding from the BMZ, while the BMU provides funding to nine member NGOs.

Table 4 Funding granted by German ministries, Christian development aid organisations and the European Commission to NGOs constituting Germany's new anti-EU trade policy network

Organisation	Funding provided by				
	BMZ	BMU	Brot für die Welt ^a	Misereor ^b	European Commission
Forum Umwelt und Entwicklung (Forum for Environment and Development)		X			
AGRARKoordination (Forum for International Agricultural Policy)	X	X	X	X	
Christliche Initiative Romero (Christian Initiative Romero)	X				X
Forum Fairer Handel (Forum for Fair Trade)	X		X	X	
Germanwatch (organisation working for global justice and the preservation of the foundations of life)	X	X			
INKOTA Netzwerk (network campaigning for a just world)	X		X		X



Organisation	Funding provided by				
	BMZ	BMU	Brot für die Welt ^a	Misereor ^b	European Commission
NaturFreunde Deutschlands (Friends of Nature, Germany)	X				
Pestizid Aktions-Netzwerk (network combating pesticides)	X	X	X	X	
Slow Food Deutschland (association promoting education on food and farming)	X		X	X	
WEED (Weltwirtschaft, Ökologie & Entwicklung) (German lobby organisation focusing on issues surrounding the alleviation of global poverty and international environmental problems)	X		X		
WWF Deutschland (World Wide Fund for Nature, Germany)	X	X			X
Zukunftsstiftung Landwirtschaft (foundation for the future of farming)	X				
medico international (human rights organisation)			X		
PowerShift (German NGO dealing with questions relating to energy, climate, natural resources, trade and economic policies)		X	X	X	X
DNR Deutscher Naturschutzring (German league for nature and environment)		X			X
Grüne Liga (Green League)		X			



Organisation	Funding provided by				
	BMZ	BMU	Brot für die Welt ^a	Misereor ^b	European Commission
Landesbund für Vogelschutz in Bayern (Bavarian Association for the Protection of Birds)		X			
UnternehmensGrün (German business association promoting a green economy)		X			X
BUND (Friends of the Earth, Germany)					X

Source: Own research based on information provided on organisations' websites, annual reports and financial reports; and the EU's Transparency Register and Financial Transparency System. For more information, see the Appendix

^a A Protestant development organisation.

^b A Catholic development aid organisation.

As concerns funding provided by the BMZ, seven NGOs received indirect funding through Germany's two largest Christian development aid NGOs: Misereor (Catholic) and Brot für die Welt (Protestant). Both organisations are almost exclusively financed by the BMZ. In 2017, for example, Misereor's project-related financial claims against the BMZ amounted to €298 million,⁶² while the project-related financial claims of Brot für die Welt amounted to some €300 million (about 99% of its total 2017 budget).⁶³ Even though both Misereor and Brot für die Welt were official members of Germany's original Stop TTIP, Stop CETA' network, they have so far not joined the new network—that is, they do not appear on the network's official list of member organisations.

Like the European Commission's DG DEVCO, the BMZ and BMU often have a strategic interest in supporting like-minded organisations. After all, public support for development aid and environmental policies depends on public opinion. However, financial support granted to NGOs such as Misereor and Brot für die Welt may stand in opposition to the stated political objectives of Germany's federal government, for example, its trade policy. At the same time, the lack of transparency with respect to NGOs' sources of funding and their expenditures often impedes democratic control, for example, via parliamentary investigations.

⁶² Misereor, 'Jahresbericht 2017' (2018).

⁶³ Brot für die Welt, 'Jahresbericht 2017' (2018).



Misereor and Brot für die Welt provide good examples. Their business models depend on continuous political support, which to a large extent depends on public opinion about trade policy and perceptions regarding the need for development aid programmes. Against this background, it is noteworthy that Misereor spent €5.5 million on campaign and public education activities in 2017. An additional €8.2 million was spent on advertising and public affairs activities.⁶⁴ Brot für die Welt spent about €9 million on campaign activities in 2017.⁶⁵ These measures aimed to increase the awareness of ‘global inequalities regarding the distribution of power and wealth’. The organisations’ annual reports do not provide detailed information on campaign activities, partner organisations or the conditions under which funding is granted to partner organisations.

Conclusions and policy recommendations

Many NGOs, including those focusing on EU trade policy, pursue a broad range of advocacy activities. They depend on private donations, membership fees, and, sometimes, significant amounts of EU and national public funding. Like businesses and business associations, many NGOs actively engage in lobbying activities inside EU institutions: direct interactions with representations of the European Commission and the EP. In addition to inside lobbying activities, NGOs engage to varying extents in campaign, protest and petition activities targeted at influencing media coverage and public opinion.

The scope and impact of NGO lobbying is difficult to assess. This is also true for NGO lobbying in the area of EU trade and investment policy. However, two patterns are apparent. First, data on both NGOs’ potential access to EU parliamentarians and actual meetings between NGO representatives and representatives of the European Commission indicates that public funding tends to considerably increase the number of inside lobbying activities carried out by NGOs and NGO networks. Second, publicly funded NGOs engage in a significant number of campaign, protest and petition activities.

Accountability problems generally arise when there are conflicting objectives between different parts of the European Commission—for example, DG TRADE and DG DEVCO—or different parts of national governments. All these observa-

⁶⁴ Misereor, ‘Jahresbericht 2017’.

⁶⁵ Brot für die Welt, ‘Jahresbericht 2017’.



tions need to be taken into consideration when assessing publicly funded NGOs and their activities favour of or against stated EU policy objectives, including those of trade, environmental, consumer and development policies.

EU policymakers should aim to ensure that NGOs financed by the EU do not fundamentally contradict the EU's basic principles, for example, free trade and a strong transatlantic relationship. Policy options include the following:

1. A comprehensive reform should be conducted of the EU's Transparency Register and Financial Transparency System. This should be done in accordance with the proposals of the Pieper Report and thus should include the introduction of a single, centralised system, operated by the European Commission, for recording and managing NGO grant funding.
2. All NGO recipients of EU funding should be required to publish the terms of reference agreed with the granting entity.
3. NGOs should be legally required to provide information on their subcontractors in the EU's registers.
4. A new clause should be added to new and renewed grant agreements with EU bodies, stipulating that taxpayer funds are not to be used (a) for targeted lobbying for public funding for the NGO(s) in question or (b) for hiring lobbying firms.
5. A mechanism should be established whereby MEPs can gain timely access to up-to-date information on projects or programmes and to the terms of reference agreed between European Commission departments and NGO grant recipients.



Appendix: Overview of member organisations in Germany's Justice in Global Trade Network (Netzwerk Gerechter Welthandel) and origins of financial funding

	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
1	Agrar Koordination – Forum für Internationale Agrarpolitik e.V. (Agro Coordination – Forum for International Agricultural Policy)	Annual reports available for 2013 to 2017, except for 2016.	No financial information available in annual reports. No financial information available on organisation's website.	n/a ⁶⁶	Yes • Directly funded by the BMZ, the BMU and Germany's Federal Environment Agency • Indirectly via Misereor and Brot für die Welt ⁷⁷	<ul style="list-style-type: none"> • BMZ • BMU • Brot für die Welt • Misereor e.V. • Umweltbundesamt und Bundesministerium für Umwelt, Natur- schutz und Reaktorsicherheit • Software AG Stiftung • Zukunftsstiftung Landwirtschaft • Stiftung Gekko • Katholischer Fonds KEW • Norddeutsche Stiftung für Umwelt und Umverteilen! • Stiftung für eine solidarische Welt Entwicklung NUE

⁶⁶ 'N/a' means that information is either not available or not applicable.

⁶⁷ Agrar Koordination, 'Jahrsbericht 2017' (2018).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
2	Arbeitsgemeinschaft bäuerliche Landwirtschaft e. V. (Working Group on Agriculture)	No accountability reports available on organisation's website.	No financial information available on organisation's website.	n/a	n/a	<ul style="list-style-type: none"> • Meine Landwirtschaft • Demo-Bündnis 'Wir haben es satt' • AgrarBündnis e.V. • Der Kritische Agrarbericht (KAB) • NEULAND e.V. • European Milk Board (EMB) • Plattform EU-Agrarpolitik • Forum Umwelt und Entwicklung (FUE) • Netzwerk Bauernhöfe statt Agrarfabriken • Projekt Eiweißfutter aus Niedersachsen • Interessengemeinschaft Nachbau • Gentechnikfreie Regionen • Informationsdienst Gentechnik • Kein Patent auf Leben • Klima-Allianz Deutschland • Netzwerk Gerechter Welthandel La Via Campesina • Germanwatch • BUND
3	Aktionsbündnis gegen AIDS (Action Group against AIDS)	No	No financial information available on organisation's website.	n/a	n/a	<ul style="list-style-type: none"> • Brot für die Welt • Catholic and Protestant organisations • One world initiative Neuss



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
4	Attac	No	No financial information available on organisation's website.	n/a	n/a	<ul style="list-style-type: none"> • BUND • DGB-Jugend • IPPNW • NaturFreunde Deutschlands e.V. • PowerShift e.V. • WEED e.V. • DGB (chapters) • Naturfreunde (chapters) • Gewerkschaft Erziehung und Wissenschaft (GEW; chapters) • Bündnis90 (Grüne (political party)) • Die Linke (political party) • Deutsche Kommunistische Partei (German Communist Party, Munich chapter)
5	Berliner Wassertisch (Water Table Berlin)	No	No financial information available on organisation's website.	n/a	n/a	<ul style="list-style-type: none"> • Attac • Bündnis 90/Die Grünen - Landesverband Berlin • Piratenpartei • DKP Berlin • IPPNW • Naturfreunde • Mehr Demokratie e.V.
6	Wasserprivatisierung nein Danke (No to Privatisation of Water Supply)	No	No financial information available on organisation's website.	n/a	n/a	n/a
7	BLUEPINGU	No	No financial information available on organisation's website.	n/a	n/a	n/a



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
8	BUND (Friends of the Earth, Germany)	Yes	No. Only rudimentary information is given for 2016 (the most recent year when this analysis was conducted). Sources and amounts of funding have not been made public. BUND's 2016 revenue was €27.1m. ⁶⁸	Yes, according to information provided in the 2016 annual report. No detailed information provided in this report.	No, according to EU Transparency Register.	<ul style="list-style-type: none"> • TTIP Council at Germany's Federal Ministry for Economic Affairs and Energy • Friends of the Earth • Bündnis für gentechnikfreie Landwirtschaft
9	BUNDjugend (BUND Youth)	No	No	n/a	n/a	<ul style="list-style-type: none"> • See BUND Friends of the Earth, Germany
10	Bundesverband Naturkostwaren (Natural Food Business Association)	n/a	n/a	n/a	n/a	n/a
11	Bündnis für gentechnikfreie Landwirtschaft (Alliance Against GMOs in Agriculture)	n/a	n/a	n/a	n/a	<ul style="list-style-type: none"> • BUND • Gentechnikfreie Regionen • Stop Glyphosat
12	Business Crime Control	n/a	n/a	n/a	n/a	<ul style="list-style-type: none"> • Mehr Demokratie e.V. • Frankfurter Bündnis gegen TTIP, CETA und TISA

⁶⁸ Friends of the Earth Germany, 'Jahresbericht 2016' (n. d.).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
13	Campact	Yes	Only rudimentary financial information available. Sources and amounts of funding have not been made public. Campact's 2016 budget was €8.9m. ⁶⁹	No	No	<ul style="list-style-type: none"> • Mehr Demokratie e.V. • Naturfreunde e.V. • Forum Umwelt und Entwicklung • Deutscher Naturschutzring (DNR e.V.) • LobbyControl e.V.
14	Christliche Initiative Romero (Christian Initiative Romero)	Yes	Relevant information provided in the 2016 financial report. Detailed information missing on how money was granted to subcontractor NGOs and other project partners. ⁷⁰	Yes. €1.74m in funding received from the EU.	Yes €142,621 in funding for work within Germany granted by the BMZ in 2016. €934,800 in funding for work outside Germany granted by the BMZ in 2016.	<ul style="list-style-type: none"> • BMZ • VENRO
15	Coordination gegen BAYER-Gefahren (Alliance Against Bayer Dangers)	No	No	n/a	n/a	<ul style="list-style-type: none"> • Die Linke • Bündnis90/Die Grünen
16	Deutscher Gewerkschaftsbund (Federation of German Trade Unions)	No	No	n/a	n/a	<ul style="list-style-type: none"> • Trade Union Intergroup • Gewerkschaft Erziehung und Wissenschaft • Vereinte Dienstleistungsgewerkschaft

⁶⁹ Campact, *Transparenzbericht 2016* (2016, updated on 1 February 2018).

⁷⁰ Romero, 'Finanzbericht 2016: Die Christliche Initiative Romero in Zahlen' (n. d.).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
17	Föderation demokratischer Arbeit-ervereine e.V. (Federation of Democratic Labour Associations)	No	No	n/a	n/a	<ul style="list-style-type: none"> • Trade Union Intergroup • Gewerkschaft Erziehung und Wissenschaft • Vereinte Dienstleistungsgewerkschaft
18	Digitalcourage e.V.	Yes	Financial information provided in the 2016 financial report. Detailed information missing for sources of funding. The 2016 budget was €464,927.75. ⁷¹	n/a	Yes. According to the EU's Transparency Register, the organisation received a €7,440 grant from the EU Commission's DG for Communication.	<ul style="list-style-type: none"> • Arbeitskreis Vorratsdatenspeicherung • C3S • European Digital Rights • FlfF e.V. • Kommunikation und neue Medien e.V. • Software für Engagierte e.V. • Torservers.net • Whistleblower-Netzwerk e.V.
19	Diözesanrat der Katholiken im Bistum Hildesheim (Council of Diocese of City of Hildesheim)	No	No	n/a	n/a	
20	Deutscher Naturschutzring e.V. (DNR) (German League for Nature and Environment)	Not available for 2017 (as of 8 August 2018).	Only rudimentary information available on sources of funding and use of funds.	According to the EU's Transparency Register, funding was received from the EU institutions in 2017.	According to the EU's Transparency Register, €1.88m was received from public funding in Germany. Institutional funding provided by the BMU.	<ul style="list-style-type: none"> • BMU • Forum Umwelt und Entwicklung • Meine Landwirtschaft

⁷¹ Digitalcourage, 'Das hat Digitalcourage 2016 bewegt: Die wichtigsten Aktionen und Kampagnen im Rückblick' (2016).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
21	Deutscher Kulturrat (German Cultural Council; German association of organisations with cultural business models)	Yes, for 2016. It does not provide financial information.	Only rudimentary information available for sources of funding and use of funds.	n/a	According to information published on the organisation's website, public funding from national sources was €616,373 in 2016, which accounted for 85% of the organisation's total annual funding for that year. ⁷²	<ul style="list-style-type: none"> • Aktionsportal www.tag-gegen-ttip.de • TTIP Council of German Federal Ministry of Economics and Technology • Stop TTIP and CETA network
22	Eine Welt Netz (One World Network)	No	No	n/a	n/a	
23	Eine Welt Zentrum Herne (One World Centre of City of Herne)	No	No	n/a	n/a	
24	Forschungs- und Dokumentationszentrum Chile-Lateinamerika e. V. (Chilean Latin-American Centre for Research and Documentation)	No	No	n/a	n/a	<ul style="list-style-type: none"> • Attac Germany • Forum Umwelt und Entwicklung • Meine Landwirtschaft • Seattle to Brussels Network EU

⁷² Website is no longer available. This information was accessed in 2016 on the website of the Deutscher Kulturrat: <https://www.kulturrat.de/kulturrat-transparent/>.



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
25	Foodwatch e.V.	No	Only rudimentary information available for sources of funding and use of funds. The organisation's total annual budget for 2016 was €3,105,685. ⁷³	No	No	<ul style="list-style-type: none"> • Umweltstiftung • Foodwatch Netherlands • Foodwatch France • Powershift e.V.
26	Forum Fairer Handel (Forum Fair Trade)	Yes	Only rudimentary information available for sources of funding and use of funds. The organisation's total annual revenue for 2016 was €838,520. ⁷⁴	n/a	In 2016, the organisation received €571,750.00 from the BMZ, €82,699.12 from Brot für die Welt (BMZ funded) and €57,580.00 from Misereor (also BMZ funded).	<ul style="list-style-type: none"> • BMZ • Brot für die Welt • Diakonie Deutschland • Misereor • INKOTA-Netzwerk • Weltladen Dachverband e.V.
27	Gentechnikfreie Regionen in Deutschland (Association against GMOs in German Regions)	No	No	n/a EU funding may have been received via BUND Friends of the Earth Germany, the organisation's umbrella organisation.	n/a	<ul style="list-style-type: none"> • BUND Friends of the Earth Germany

⁷³ Foodwatch, 'Einnahmen und Ausgaben von foodwatch 2012-2016 im Überblick' (2017).

⁷⁴ Forum Fairer Handel, 'Forum Fairer Handel Jahresbericht 2016' (2017).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
28	GERMAN-WATCH e.V. (Organisation working for global justice and the conservation of the foundations of life)	Yes	List of donor organisations provided in financial report for 2016. Only rudimentary information available for use of funds. The organisation's total annual revenue for 2016 was €3,084,688.32. ⁷⁵	Yes. EU Commission funding via University of Genua: €20,714.25.	Yes. Public funding from several governmental institutions: BMU: €487,125.50, BMZ: €442,010.58, Federal Ministry for Education: €120,785.96, BMU and Federal Environment Agency: €73,027.02. Additional public funding was granted by numerous sub-federal institutions.	<ul style="list-style-type: none"> • German Federal Ministry for Economic Cooperation and Development • German Federal Ministry for Education • BMU • WWF • Stiftung Zukunftsfähigkeit e.V. • Brot für die Welt • Misereor • Eine-Welt-Netz NRW • Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) • Heinrich-Böll-Stiftung • Die Grünen / Europäische Freie Allianz • Greenpeace
29	Greenpeace	Yes, for 2016. Hidden on organisation's website. Google search provides link to information.	No. Reference made to Greenpeace International, whose annual budget was €81.1m in 2016. ⁷⁶	No, according to the EU's Transparency register.	No, according to the EU's Transparency register.	<ul style="list-style-type: none"> • Germanwatch

⁷⁵ The website is no longer available. In 2016 this information was accessed on the website of German Watch: <https://germanwatch.org/de/download/19546.pdf>. Financial data for 2015 and 2016 and can be retrieved from the report 'Rechenschaftsbericht des Vorstands 2016-2017', which is available at <https://www.germanwatch.org/sites/germanwatch.org/files/publication/19546.pdf>.

⁷⁶ Greenpeace, 'Jahresbericht 2016' (2017).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
30	Grüne Liga (Green League)	Yes	No	n/a	No information provided for sources and amounts of funding received. Website states that funding is provided by the BMU.	<ul style="list-style-type: none"> • DNR • Forum Umwelt und Entwicklung
31	Gegen Nachbau-Gebühren (Association against the Fees for Reproducing Seeds/Plants in Agriculture)	No accountability report available on organisation's website.	No financial information available on organisation's website.	n/a	n/a	<ul style="list-style-type: none"> • Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL)
32	INKOTA Netzwerk (Network campaigning for a just world)	Yes	<p>Yes. List of donor organisations provided in the financial report for 2016. Only rudimentary information available on conditional restrictions and use of funds.</p> <p>The organisation's 2016 budget was €1,775,007.⁷⁷</p>	Public funding from national and EU sources amounted to €1,298,338 in 2016.	<p>Public funding from national and EU sources amounted to €1,298,338 in 2016.</p> <p>The BMZ granted €927,991.</p> <p>Additional public funding of €173,973 was granted by Brot für die Welt.</p>	<ul style="list-style-type: none"> • BMZ • Brot für die Welt • TTIPUnfaihandelbar

⁷⁷ INKOTA Netzwerk, 'Finanzen: Einnahmen und Ausgaben' (2017).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
33	IPPNW (Internationale Ärzte für die Verhütung des Atomkrieges) (International Medical Doctors Aimed at Preventing Nuclear Wars)	No. The last report published was for 2013 (as of 8 August 2018).	No	n/a	n/a	
34	Katholische Arbeiterbewegung e.V. (KAB) (Catholic Labour Movement)	No	No	n/a	n/a	
35	Katholische Frauengemeinschaft (kfd) (Association of Catholic Women)	No	No	n/a	n/a	
36	Landesbund für Vogelschutz in Bayern (LBV) e. V. (Bavarian Association for the Protection of Birds)	Yes	Yes. The organisation's annual budget in 2016 was €12.1m. ⁷⁸	Yes, but no detailed information given in the financial report.	Yes. Grants received from several public institutions in Germany, e.g. the BMU, Bavarian Ministry for the Environment, Federal Agency for Nature Conservation and Bavarian Nature Fund.	• BMU

⁷⁸ Landesbund für Vogelschutz, 'Jahresbericht 2017' (2018).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
37	Kampagne Meine Landwirtschaft (My Agriculture Campaign Group)	No	No	n/a	No specific information given on organisation's website. Public funding received via DNR and Forum Umwelt und Entwicklung (the campaign organisation's umbrella organisations)	<ul style="list-style-type: none"> • BMU • DNR • Forum Umwelt und Entwicklung • Meine Landwirtschaft
38	Medico international e.V. (Human rights organisation)	Yes	Yes. Only very rudimentary information available for origins of funding and use of funds. Total 2017 revenue was €12.9m. ⁷⁹	n/a	Yes, via Bündnis Entwicklung Hilft, Misereor and Brot für die Welt.	<ul style="list-style-type: none"> • Brot für die Welt • Misereor • Bündnis Entwicklung Hilft
39	Mehr Demokratie e.V. (Association Promoting Elements of Direct Democracy)	Yes	Yes. No information available for origins of funding. Only very rudimentary information for use of funds.	No, according to EU Transparency Register.	No, according to EU Transparency Register.	

⁷⁹ Medico International, 'Finanzbericht 2017' (n. d.).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
40	Mellifera e.V. (Association Promoting Natural Treatment of Bees)	No	No	n/a	n/a	
41	NaturFreunde Deutschlands (Friends of Nature Germany)	No	No	n/a	Yes, public funding granted to regional associations. Project-specific funding granted by the BMZ. Information difficult to find.	<ul style="list-style-type: none">• BMZ• NaturFreundeJUGEND
42	NaturFreundeJUGEND (Youth of Friends of Nature Germany)	No	No	n/a	Yes, public funding granted to regional associations. Information difficult to find.	<ul style="list-style-type: none">• NaturFreunde
43	Naturland – Verband für ökologischen Landbau e.V. (Business Association Promoting Organic Agriculture)	No	No	n/a	n/a	



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
44	Pestizid Aktions-Netzwerk e.V. (PAN Germany) (Pesticide Action Network)	No	No	n/a	Yes. Funding directly received from the BMZ and the BMU. Funding indirectly received through various organisations including GIZ, Brot für die Welt and Misereor.	<ul style="list-style-type: none"> • Bund für Umwelt und Naturschutz Deutschland e.V. (BUND) • Coordination gegen Bayer-Gefahren e.V. (CBG) • Greenpeace e.V. • Umweltinstitut München e.V. • Brot für die Welt • Misereor • BMZ • BMU • GIZ • German Federal Environment Agency • Bündnis 90/Die Grünen • Eine Welt Netzwerk Hamburg
45	PowerShift e.V. (German NGO dealing with issues related to energy, climate, natural resources, trade and economic policies)	No	No detailed accounts. Only rudimentary information available for sources of funding and overall budgets. The latest year for which figures are available is 2017. 2017 income (budget) was €410,388. ⁸⁰	According to the EU's Transparency Register, in 2016 the organisation received €126,877 from the EU Commission's DG for Development and Cooperation	According to the EU's Transparency Register the organisation received €228,343 in funding from public sources. There were several donors which receive public funding from national sources, e.g. Brot für die Welt, Misereor and the BMU. ⁸¹	<ul style="list-style-type: none"> • Attac • Seattle to Brussels Network • Brot für die Welt • Misereor • Campact • Rosa Luxemburg Foundation • DIE LINKE • BMU

⁸⁰ PowerShift, 'Gewinn- und Verlustrechnung 2017' (n. d.).

⁸¹ Pestizid Aktions-Netzwerk, 'Wir bedanken uns herzlich bei unseren Förderern' (2019).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
46	Robin Wood (Non-Violent Alliance for Nature and the Environment)	No	No	n/a	n/a	
47	SOS, Save our Seeds (Foundation on Future Farming – Global Agriculture Campaign)	No	No	n/a	n/a	<ul style="list-style-type: none">• Meine Landwirtschaft• Zukunftsstiftung Landwirtschaft
48	SKM BUN-DESVERBAND e. V. - katholischer Fachverband (Association of Social Catholics – Member of German Association of Members of Caritas)	No	No	n/a	n/a	



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
49	Slow Food Deutschland e.V. (Association Promoting Education on Food and Farming)	Yes	No	n/a. Only rudimentary information available on source of funds.	Only rudimentary information available on conditional restrictions and use of funds. Annual report indicates that public money was granted by the BMZ, the German Ministry of Food and Agriculture, Brot für die Welt, Misereor, and the Heinrich-Böll-Stiftung (political foundation of the Green Party of Germany). ⁸²	<ul style="list-style-type: none"> • Brot für die Welt • Misereor • BUND • Christliche Initiative Romero • INKOTA • Deutsche Bundesstiftung Umwelt • Forum Umwelt und Entwicklung • Heinrich-Böll-Stiftung • Mehr Demokratie e.V. • Mellifera e. V. • Naturschutzbund Deutschland e.V. • Umweltinstitut München e. V.
50	SOAL e. V., Sozial & Alternativ Landesverband Hamburg (Alternative Welfare Association)	No	No	n/a	No information available on website, but the organisation receives financial support from member organisations, of which most are funded by public money.	

⁸² Slow Food Deutschland e.V., 'Jahresbericht 2017/18' (2018).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
51	Solidarische Landwirtschaft e.V. (Association for Solidarity in Agriculture)	No accountability report available on organisation's website.	No financial information available on organisation's website.	n/a	n/a	<ul style="list-style-type: none"> Arbeitsgemeinschaft bäuerliche Landwirtschaft
52	STOPP TTIP BERCHTESGADENER LAND/ TRAUNSTEIN (Stop TTIP Network of City of Berchtesgaden)	No	No	n/a	n/a	
53	SumOfUs (Campaign network committed to curbing the growing power of corporations)	No	Yes, but no information about sources and use of funding. The total campaign expenditure was €4,081,178 in 2016. ⁸³	n/a	n/a	
54	Umweltinstitut München e.V. (Munich Environmental Institute e.V.)	Yes	No	n/a	Yes, according to information provided on its website, the organisation received public funding from public budgets, e.g. from the City of Munich.	<ul style="list-style-type: none"> Pestizid Aktions-Netzwerk e.V Arbeitsgemeinschaft bäuerliche Landwirtschaft Campact BUND

⁸³ SumOfUs, 'Unsere Finanzierung' (n. d.).



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
55	UnternehmensGrün e.V., Bundesverband der grünen Wirtschaft (Business Association Promoting a Green Economy)	Yes	Yes, but no information about sources and use of funding.	Yes. The organisation received €65,000 in funding from the European Social Fund.	Yes, funding was granted by the BMU and the Ministry for the Environment of the federal state of Baden-Württemberg and Hesse, and the German Federal Environment Agency.	<ul style="list-style-type: none"> • BMU • Ministry for the Environment of the federal state of Baden-Württemberg • Ministry for the Environment of the federal state of Hesse • German Federal Environment Agency
56	Verband deutscher Schriftstellerinnen und Schriftsteller (Association of German Writers)	No	No	n/a	n/a	<ul style="list-style-type: none"> • Verdi
57	WEED - Weltwirtschaft, Ökologie & Entwicklung e.V. (German lobby organisation focusing on issues surrounding global poverty alleviation and international environmental problems)	Yes	Yes, but only information about sources and use of funding. Annual revenue was €373,964.48 in 2017. ⁸²	n/a. Publicly available information indicates that the organisation received EU funding via the Development Cooperation Department of the City of Berlin, which is partly funded by EuropeAid.	According to the EU's Transparency Register, the organisation received €189,506 in funding from public institutions. Public funding was granted directly by the Development Cooperation Department of the City of Berlin and the BMZ, and indirectly via Brot für die Welt.	<ul style="list-style-type: none"> • attac • Brot für die Welt • BMZ • Friedrich-Ebert-Stiftung • DGB • VENRO • Seattle to Brussels Network (S2B)



	Name of organisation	Accountability report available on organisation's website?	Information available on sources of financial funding?	Recipient of EU funding?	Recipient of funding from national budgets?	Networks and network partners
58	WWF Deutschland (World Wide Fund for Nature Germany)	Yes	Yes. Annual revenue for July 2016 – June 2017 was €76,736,000. ⁸⁴	According to the EU's Transparency Register, the organisation received €17.8m in public funding, of which €399,561 was received from the EU.	According to the annual report, the organisation received €20.4m in the period July 2016 – June 2017. According to the EU's Transparency Register, the organisation received €17.8m in public funding, of which €12.4m was received from national sources. Public funding was granted by the BMZ, the BMU and the KfW Development Bank.	<ul style="list-style-type: none"> • BMZ • BMU • KfW Development Bank
59	Zukunftsstiftung Landwirtschaft (Foundation for the Future of Farming)	No	No	n/a	n/a. One strand of GLS Treuhand, the Zukunftsstiftung Entwicklung, received public funding from the BMZ.	<ul style="list-style-type: none"> • SOS, Save our Seeds • GERMANWATCH • AGRARKoordination • GLS Bank • GLS Treuhand

Source: Own research.

⁸⁴ World Wide Fund for Nature Germany, 'Jahresbericht WWF Deutschland 2016/2017' (2017).



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