

PIPELINES OF POWER

Big Oil's lobbying footprint on EU climate policy



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Introduction

The Green Deal, the EU's landmark package in the fight against the climate crisis, kick-started the continent's path towards a sustainable future. Borne out of a strong mandate in 2019, some Green Deal policies are becoming reality for millions of citizens across the continent. The deployment of renewables has increased significantly, combustion cars are being swapped for electric vehicles and homes across the EU are being equipped with energy efficient heat-pumps. However, these are low-hanging fruits. The only pathway to net zero, the key aim of the Green Deal, lies in a complete phaseout of harmful fossil fuels. Yet this is an objective that appears ever-more elusive half a decade later.

Climate scientists are sounding the alarm, decrying a mismatch between the EU's ambitions and the absence of definitive plan to transition away from oil and gas.¹ On the contrary, fossil fuel subsidies have reached record levels in recent years.² The new Commission outlines a vision for a "Clean Industrial Act"³ that trumps competitiveness – often a code word for deregulation – over rapid decarbonisation. It puts faith in unproven technologies such as blue hydrogen and carbon capture that implicitly involve the continued extraction of fossil fuels. How did we get here?

Part of the answer lies in the relentless behind-closed-door lobbying by big fossil fuel companies to champion a future that sees technology as the primary solution to reaching net zero. Big Oil's misalignment with the goals of the Paris agreement is well-documented.⁴ More attention should however be paid to its lobbying activities in Brussels. Home to over 12,000 organisations, the EU's capital boasts one of the largest lobby transparency registers in the world.⁵ And at close to 16 million euros per year, the seven largest fossil fuel companies wield considerable budgets to influence policymakers and push their narratives to the top of the agenda.

To get a clearer picture, Transparency International EU analysed the EU lobbying data of the world's top seven fossil fuel companies by global revenue, namely Shell, Total, Eni, Equinor, ExxonMobil, BP and Chevron.⁶ The results highlight a deeply interwoven and well-resourced network. We found that the Big Seven, along with a network of over 50

¹ Towards EU climate neutrality: progress, policy gaps and opportunities, assessment report 2024, European Scientific Advisory Board on Climate change:

<https://climate-advisory-board.europa.eu/news/eu-climate-advisory-board-focus-on-immediate-implementation-and-continued-action-to-achieve-eu-climate-goals>

² Idem.

³ Political Guidelines for the next European Commission 2024 – 2029, European Commission, 2024, page 8:

https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf

⁴ Big Oil Reality Check: Aligned in Failure, Report, Oil Change International, Myriam Duo and Al-Johnson Kurts, May 2024, page 5:

https://www.oilchange.org/wp-content/uploads/2024/05/big_oil_reality_check_may_21_2024.pdf

⁵ EU Transparency Register, accessible here:

https://transparency-register.europa.eu/index_en

⁶ "Leading oil and gas companies worldwide based on revenue as of 2024", Statista, 2024: <https://www.statista.com/statistics/272710/top-10-oil-and-gas-companies-worldwide-based-on-revenue/>

organisations and a total lobbying budget close to 64 million euros,⁷ attended more than 1000 meetings with the European Commission between the start of the von der Leyen mandate in December 2019 and May 2024. Two thirds of these meetings concern Green Deal policies. These organisations may also possess significant influence as members of the boards of their affiliate networks. As if that weren't enough, this influence extends to international climate conferences, such as the UN Conference of Parties (COP). Given the global stakes at play, we must ensure highest levels of transparency, integrity and accountability for lobbyists in the EU.

Big Oil's network of influence

To understand the extent of the access these seven companies enjoy, we have analysed their high-level meetings with the European Commission. From the start of the first von der Leyen Commission in December 2019 until May 2024, we found a total of 203 meetings. Oil giant Shell makes the top of the list, with attendance at 60 meetings, constituting an impressive 30% of all recorded encounters with the Big Seven.⁸

Company	Commission encounters
Shell Companies	60
Eni S.p.A	34
Total Energies	33
ExxonMobil	30
BP p.l.c.	30
Equinor ASA	29
Chevron	3

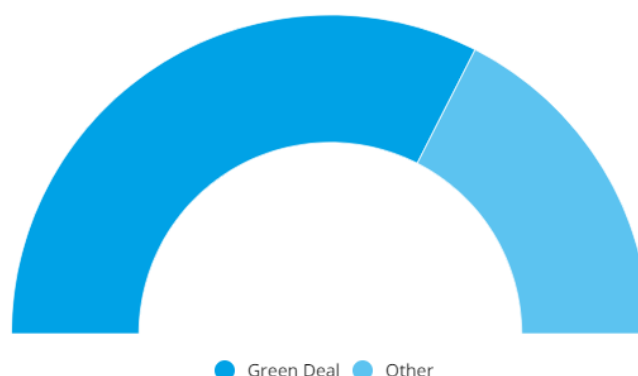
In terms of subject matter, over two-thirds of declared meetings mention policy areas directly related to the European Green Deal. Two recurring subjects – hydrogen and carbon capture storage – comprise over 20% of all these Green Deal-related meetings. Both are often touted as the necessary way forward by the industry,⁹ despite implicitly involving a delay of a total phaseout of fossil fuels.

⁷ This number comprises the combined lobbying budgets of big 7 and their affiliated organisations as declared on the EU Transparency Register. Please consult the methodology for more information.

⁸ Multiple companies can be present in the same meeting. The total number of individual contacts by the big 7 is 219 that took place over 203 meetings with high-level Commission officials.

⁹ "Carbon storage and Hydrogen: a match made in heaven?", Prachi Patel, IEEE Spectrum, 14 March 2023: <https://spec-trum.ieee.org/carbon-capture-and-storage>

Over **two-thirds** of declared meetings are related to Green Deal policy areas



Of the Big Seven, US-based Chevron is an outlier, as it recorded only three high-level meetings with the Commission during the full mandate. However, their Transparency Register entry¹⁰ declares an estimated one million euros in costs related to lobbying activities. This naturally raises questions as to how this money is spent.

In fact, the Big Seven appear to possess a somewhat limited lobbying footprint at the highest level of the European Commission overall. To put this in context, during the first von der Leyen mandate, the ten organisations with the largest number of meetings individually held over 100 meetings. In contrast, Shell, Total and Eni barely breach the top 100 organisations with the most meetings. This is an unexpected result, given these organisations declare a combined total of up to 15.6 million euros in annual lobbying expenditure on the Transparency Register. Part of the answer lies in the fact that meetings with staff below the Director-General level – most staff – are not proactively published.¹¹ The other part owes to the Big Seven’s extensive use of lobbying networks in Brussels.

The impact of networks

Networks often represent the interests of an entire industry (e.g., automobiles or hydrogen energy) or conduct advocacy activities on a single topic (e.g., micro-plastics) to maximise legislative impact, and, as such, also boast considerable financial resources. This allows corporations to multiply their entry points into EU policy, a privilege most non-commercial organisations do not have.¹² In closely examining each of these companies' transparency register entries, we found that the Big Seven belong to a total of 52 networks. This includes some of the largest business associations active in Brussels, such as

¹⁰ Chevron transparency register entry:

https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_en?id=09981988815-02

¹¹ Access to those meetings requires the submission to lengthy “access to document” procedure that often fail to provide a comprehensive picture. This procedure requires prior knowledge of specific meetings and the names of officials attending.

¹² Green deal imbalance unveiled: who’s accessing the EU institutions”, [Pia Engelbrecht-Bogdanov](https://transparency.eu/green-deal-imbalance-unveiled/), 21 February 2024: <https://transparency.eu/green-deal-imbalance-unveiled/>

Business Europe, European Chemical Industry Council, International Association of Oil & Gas Producers as well as sectoral associations such as Hydrogen Europe and the Carbon Capture & Storage Association.

Our analysis found that the fossil fuel industry substantially increases its meetings through networks, with meetings climbing from 203 to 1033. This fivefold multiplication hints at far greater access to EU decision-makers for these fossil fuel companies than might be initially perceived.

MEETINGS



203

Between Big 7 and European Commission



1033

Between Big 7 including networks with European Commission

When examining the discussed topic during these meetings, we found that two-thirds of all declared high-level meetings held with the organisations that form fossil fuel's extensive network also concern Green Deal policy areas.

In principle, it is not an issue when stakeholders meet with the Commission to discuss current and future legislation. Yet current developments compel us to question the intentions behind such engagements, particularly regarding companies' alignments with critical environmental initiatives such as the Green Deal and the Paris Climate Agreement.

Take Shell, for instance. The oil giant has recently revised its emissions reduction pledge, scaling back from a previous target of 20%,¹³ to now aiming for a more modest 15-20% reduction by 2030.¹⁴ This comes as the International Energy Agency has clearly stated that there is simply no room for additional oil and gas fields if we are to reach net zero emissions by 2050.¹⁵

¹³ Shell revises climate targets as it plans to keep gas business growing, Tom Wilson, Financial Times, March 2024:

<https://www.ft.com/content/d38f4488-f31e-451a-9837-ab9dcc3ccb70>

¹⁴ Energy transition strategy 2024, Shell Companies, March 2024:

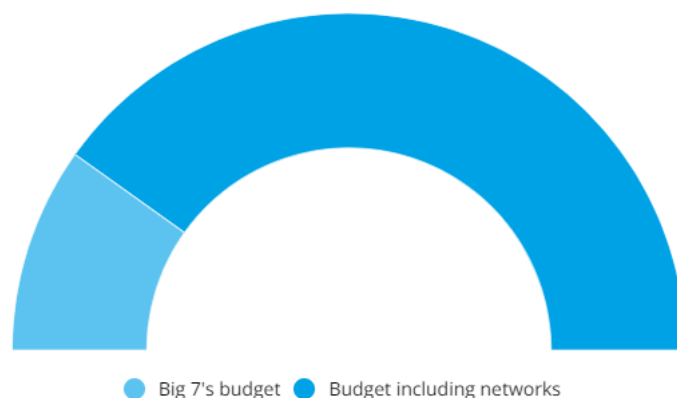
<https://www.shell.com/news-and-insights/newsroom/news-and-media-releases/2024/shell-publishes-energy-transition-strategy-2024.html>

¹⁵ Net zero by 2050: a roadmap for the global energy sector, International Energy Agency, May 2021:

<https://www.iea.org/reports/net-zero-by-2050>

Furthermore, the EU's transparency register allows us to scrutinise registrants' lobbying budgets, or an 'Estimate of annual costs related to activities covered by the register'.¹⁶ The budgets of the top seven amount to almost 16 million euros. However, when factoring in all associated networks, that figure skyrockets to 64 million euros.

Budget skyrockets from 16 million euros to 64 million euros when considering networks.



This means we are looking at more than 1000 meetings with an overall budget of more than 64 million euros. This may be spent not only to engage directly with top-level EU officials but also on a diverse range of indirect lobbying actions such as:

- Hiring a former top-ranking EU official¹⁷ to gain access to their knowledge and personal network. While rules governing the revolving door – the movement from the EU institutions to a job in the private sector – exist, they are often poorly enforced in the case of the Commission¹⁸ or wholly inadequate in the case of the Parliament.¹⁹ It is simply far too easy for organisations to hire former officials, possibly jeopardising the integrity of decisions they made in drafting legislation.

¹⁶ The estimated annual cost related to activities covered by the Transparency Register covers: salaries, rent, communications, travel and events. See Annex II, III "Financial information" of the Interinstitutional agreement on mandatory transparency register:

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2021.207.01.0001.01.ENG

¹⁷ EU imposes restrictions on former climate official over his new gas role, Politico, August 2024:

<https://www.politico.eu/article/diederik-samson-frans-timmermans-eu-imposes-restrictions-climate-official/>

¹⁸ How the European Commission handles revolving door cases by senior staff members, European Ombudsman, May 2024:

<https://www.ombudsman.europa.eu/en/opening-summary/en/186549>

¹⁹ Integrity Loopholes in the European Parliament: a guide, Transparency International EU, June 2023, Pia-Engelbrecht-Bogdanov:

<https://transparency.eu/integrity-loopholes-in-the-european-parliament-and-their-risks-for-our-climate-a-guide/>

- Sponsoring large events²⁰ to create networking opportunities with key decision-makers. While this is part of normal operations for Brussels-based lobbyists, well-resourced organisations can host dozens of events per year, crowding out civil society organisations with fewer resources.
- Producing research and funding research institutions. Big Oil has a history of providing millions of funding to universities and research institutions.²¹ This could raise ethics concerns, given the industry's history in promoting narratives to delay the transition away from fossil fuels.²² It could also blur the line between valid scientific research and lobbying.

It is vital that all costs associated with lobbying work in Brussels are correctly reflected in the lobbying budgets provided on the EU Transparency Register. Organisation information should also be scrutinised, given that, according to the Transparency Register's Code of Conduct, registrants should not try to obtain decisions dishonestly and must prevent conflicts of interest when employing former officials.²³

A key issue here is the lack of resources – both human and financial – to verify entries and conduct thorough investigations. Currently, a mere eleven EU officials²⁴ are tasked with managing and verifying the information provided by over 12,000 organisations. While spot checks are conducted, they are often the result of complaints rather than proactively performed,²⁵ leaving the door wide open for potential breaches to the Code.

Influence through board composition

A crucial factor of analysis is the degree to which the Big Seven hold sway over the policy objectives of their associated networks. While this cannot be inferred from meetings and

²⁰ Decarbonisation in action: the potential for bioenergy and hydrogen for CSS, Eurogas tech conference, November 2024:

[Eurogas Tech Conference 'Decarbonisation in action: The potential of bioenergy and hydrogen for CCS' - Eurogas](#)

²¹ European Universities accept €260 million in fossil fuel money, November 2023:

<https://www.investigate-europe.eu/posts/european-universities-accept-260-million-euros-fossil-fuel-money>

²² How the Oil industry has sustained market dominance through policy influence, InfluenceMap, Report, July 2024:

<https://influencemap.org/briefing/Undermining-Progress-Investigating-the-Fossil-Fuel-Sector-s-Continual-Dominance-26562>

²³ Code of Conduct, paragraph (c) & (i), EU Transparency Register:

https://transparency-register.europa.eu/legal-references-and-data-protection_en#code-of-conduct

²⁴ Annual report on the functioning of the EU Transparency Register 2023, presented by the Transparency Register Management Board, 2023, European Commission, Parliament and & Council:

https://transparency-register.europa.eu/document/download/0b39bbcf-231b-4d77-87d1-15b676343daf_en?file-name=TR%20Annual%20Report%202023.pdf

²⁵ Special Report 05/2024 EU Transparency Register – provides useful but limited information, European Court of Auditors, May 2024:

<https://www.eca.europa.eu/en/publications?ref=SR-2024-05>

financial data alone, an in-depth look at board memberships can further reveal whether the Big Seven are able to extend their power to the executive decision-making bodies of organisations that form their networks.

We found that Big Seven executives sit on 16 out of 45 of their Brussels-based associated networks' boards. In other words, they potentially hold significant responsibilities in shaping the direction of lobbying operations in 35% these organisations. In theory, this could also include the possibility of deciding how to spend part of the combined 64 million euros in annual lobbying budget these associated networks have declared on the Transparency Register.

In total, the 52 boards of the declared EU and national networks we examined comprise 506 individual members. These individuals are employed at 383 companies or organisations. Two Big Seven companies, Shell and Total, have nine of their employees sitting on these boards. This makes them capable of placing more representatives in decision-making bodies within their network than any other company or organisation.

For example, other global companies such as Boeing, Airbus, Novartis or L'Oreal have only placed a single representative on one of these boards. In fact, 90% of all 383 organisations have only successfully placed a single individual in these same decision-making bodies, highlighting how the Big Seven hold significant decision-making power within their network compared with their peers.

As part of our investigation, we further delved into the gender composition of these boards, revealing a stark reality: only 26% of board members are women, while a staggering 74% are men. This lopsided gender distribution underscores the industry's entrenched male dominance. However, it is not simply a matter of gender equality, it is about ensuring fair and effective policymaking. As noted by the International Energy Agency,²⁶ diverse perspectives are essential for successfully navigating the transition to cleaner energy sources.

The overall picture shows a deeply interwoven network of influence in Brussels, in which the Big Seven are able to hold significant executive authority. This is compounded by the reality that some of the most well-resourced and connected organisations in the world are operating in an environment that has weak safeguards against undue influence and conflicts of interest. This holds particularly true in the European Parliament, which not only allows Members of the European Parliament (MEPs) to engage in inside jobs, but permits conflicts of interest, provided MEPs are transparent about these activities. These activities are governed by a weak oversight system that does not pro-actively investigate breaches to ethics rules. Nor do the corresponding sanctions function as an effective deterrent.

A prime example that raises concern here is the 'European Energy Forum' (EEF), a non-profit organisation composed of MEPs as 'active members' and 'associate members',

²⁶ Innovative solutions require a diverse and equitable energy sector, International Energy Agency, <https://www.iea.org/topics/energy-and-gender>

which are mostly comprised of global and national fossil fuel companies.²⁷ Five companies - BP, Eni, Equinor, Exxon, TotalEnergies - and 11 associated networks from our analysis are associate members of this organisation. The EEF regularly hosts events, including a discussion with Energy Commissioner Kadri Simson titled: "Looking Back at the Last 5 Years' Achievements and Shaping Tomorrow's Energy Policy".²⁸ While such forums are not explicitly prohibited, as a registered lobby organisation,²⁹ this significantly blurs the line regarding the potential influence it might have on the decision-making process. While these so-called unofficial groupings are fully sanctioned by the Parliament's own internal rules,³⁰ the participation of MEPs in their governing structures raise serious concerns about preferential access given to corporate members.

A global web? The COP connection

The Big Seven's substantial network of access to decisionmakers extends far beyond the confines of Brussels. The 28th UN Conference of Parties (COP28) saw high hopes of adopting a global timeline and agreement on the total phase out of fossil fuels.³¹ Not only did the Parties fail to do so, opting for a more loosely defined "transition away" approach, the COP28 also saw record attendance by fossil fuel lobbyists. In fact, from COP27 to COP28, the number of fossil fuel lobbyists increased by a staggering 286%,³² perhaps owing to the fact that the latter took place in the UAE, one of the largest fossil fuel-producing countries in the world.

Our own analysis here reveals a large overlap between these fossil fuel lobbyists and the Big Seven Brussels-based network of associated organisations. We found that out of the whole network of affiliated entities and the Big Seven themselves, over a third attended COP28.

²⁷ European Energy forum website, available here:

<https://www.europeanenergyforum.eu/members/active-members/>

²⁸ Looking back at 5 years of achievements and shaping tomorrow's energy policy with Commissioner Kadri Simson, European Energy Forum event, July 2024:

<https://www.europeanenergyforum.eu/discussions/looking-back-at-the-last-5-years-achievements-and-shaping-tomorrow-energy-policy-with-energy-commissioner-kadri-simson/>

²⁹ Transparency Register entry of the European Energy forum available here:

https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_en?id=45953576620-17

³⁰ Rule 35a of the European Parliament Rules of Procedure:

https://www.europarl.europa.eu/doceo/document/RULES-9-2023-11-01-RULE-035-1_EN.html

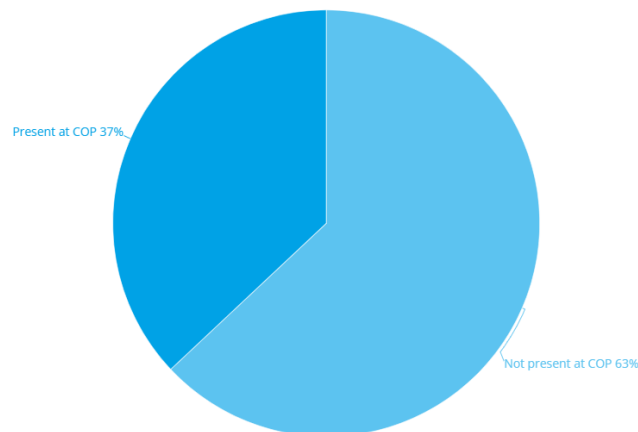
³¹ "COP28: A signal to the industry", Greenpeace, Gaby Flores, 13 December 2013:

<https://www.greenpeace.org/international/story/64386/cop28-signal-fossil-fuel-industry/>

³² According to Kick Big Polluters Out Coalition, attendance of Fossil Fuel Lobbyists at 636 and 2456 for COP27 and 28 respectively:

<https://kickbigpollutersout.org/articles/release-record-number-fossil-fuel-lobbyists-attend-cop28>

COP28 ATTENDANCE



While an overlap is to be expected, since some of these EU-based networks represent some of the largest industries in the world, the findings equally raise concerns about the lack of safeguards against undue influence and conflicts of interest in UN climate policy-making processes.³³ The EU should lead by example by adopting the highest ethics standards at home and championing a culture of integrity, transparency and accountability in global climate policymaking.

Conclusion: just the tip of the iceberg

This report reveals the vast scope of the Big Seven's access to EU climate decision-making, not merely via direct meetings with high-ranking officials, but also via the intricate web of networks and board memberships that amplify their lobbying efforts. This web of influence extends all the way to the global level of climate policymaking, with minimal transparency of and accountability in the decisions taken on our behalf.

While instruments such as the EU Transparency Register and the publication of high-level meetings should ensure transparency and accountability, these declarations merely represent the 'tip of the iceberg'. Most Commission lobbying occurs via contacts with lower-ranking Commission officials, and therefore remains in the dark. Rules of engagement between EU decisionmakers and lobby organisations are patchy at best, and rarely enforced, creating an acute risk of policy capture and conflicts of interest.

The success of the European Green Deal, and the EU's legal commitment to the Paris Agreement, are contingent on a total phaseout of fossil fuels. Not only should EU officials be held accountable for the decisions made on our behalf, but these should be made in

³³ Conflicts of Interests and Undue Influence in Climate Action: putting a stop to corporate efforts undermining climate policy and decisions', Climate Governance Integrity Programme, Transparency International, 2021:

https://images.transparencycdn.org/images/2021_ConflictsOfInterestClimateAction_PolicyBrief_EN.pdf

the public interest. Citizens should also be made aware of whether those decisions are the results of fossil fuel's extensive access and networks.

This report represents a re-evaluation of how lobbying is conducted, to ensure that EU climate policies are made in the genuine interest of all citizens, rather than being disproportionately swayed by the fossil fuel industry. To this end, Transparency International EU calls for the following recommendations:

- The European Commission must publish all scheduled meetings with interest representatives with all officials involved in drafting legislation or policymaking.
- The European Parliament should enforce a ban on MEPs engaging in paid activities for entities listed in the EU Transparency Register, to ensure they are not placed in a position of conflict between their democratic mandate and outside interests. At the same time, MEPs shall only meet lobbyists registered in the Transparency Register. Overall, Parliament must establish a comprehensive system for monitoring, oversight, and enforcement, with deterrent sanctions applied in cases of non-compliance.
- The joint secretariat of the EU Transparency Register must be adequately resourced to monitor the information provided by interest's representatives and pro-actively investigate and sanction breaches to the Transparency register's Code of Conduct. Organisations that do not comply with the rules should be deregistered and prevented from accessing EU officials.
- Interest representatives registered on the EU Transparency Register should adopt the best practice of systematically indicating on their Transparency Register entry their presence in international public decision-making bodies such as the COP conferences.
- The European Commission and President von der Leyen should make a clear commitment to upholding the highest standards of transparency, integrity and accountability in EU climate policies and promote the adoption of these standards in international forums dealing with climate change.



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