

# Lobby Dashboard

Methodological memorandum — Purpose, dossier selection, page architecture, the non-causal outcome assessment, and limitations in use

## 1. Introduction and problem statement

The Lobby Dashboard is a citizen-facing transparency instrument that documents, for a selected set of EU legislative files, which interests seek to shape the outcome, what resources they deploy, which Members of the European Parliament they meet, and how the final text compares to the Commission's original proposal. It is the second of three instruments within the EU Governance Assessment project, alongside the EUGA composite index and country dashboard (documented separately in the EUGA Methodology Memorandum) and a planned instrument on the veto mechanism in Council decision-making.

Where the EUGA measures governance outcomes at member state level, the Lobby Dashboard addresses the process by which EU-level decisions are reached. The two instruments are complementary rather than overlapping: the EUGA asks how well a member state's governance aligns with the values named in Article 2 TEU; the Lobby Dashboard asks who was in the room when a specific piece of Union legislation was written. This memorandum sets out, on a stand-alone basis, how the dashboard is constructed: why such an instrument is needed, how dossiers were selected, what each dossier page contains and why, how the most methodologically difficult question — what lobbying actually achieved — is handled, and what the instrument cannot be used for.

## 2. Need and purpose

### 2.1 The problem: decision-making as a black box

EU institutions decide, but for the average citizen it remains largely invisible who played which role in reaching that decision. This invisibility is not attributable to an absence of data. The EU Transparency Register, the published record of Members' meetings with interest representatives, and the Commission's own meeting disclosures all exist. The difficulty is fragmentation and inaccessibility: the raw data are numerous, technical, and not connected to a coherent account of any single legislative file. For a citizen without specialist knowledge of EU procedure, the threshold for assembling a complete picture independently is in practice insurmountable.

### 2.2 What existing instruments do not offer

Whether a comparable instrument already existed was investigated explicitly during development. That investigation identified several valuable and partly overlapping resources, but no instrument that answers the question 'who is shaping this particular file, and with what result' at a glance.

| Existing instrument                                | What it does provide                                                                                 | What it does not provide (and the Lobby Dashboard seeks to)                                                                      |
|----------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| EU Transparency Register                           | The source data itself: registered organisations, categories, declared financial bands.              | No linkage to specific files, no timeline, no interpretation accessible to a non-specialist.                                     |
| LobbyFacts.eu (CEO/LobbyControl)                   | A searchable, historical mirror of the register; rankings by declared expenditure.                   | No dossier pages, no timeline set against the legislative process, no assessment of what was achieved.                           |
| Integrity Watch EU (Transparency International EU) | Links the register, Parliament meeting disclosures and Members' declarations of financial interests. | Organised per Member of the European Parliament rather than per file; no treatment of specific points of contention or outcomes. |
| InfluenceMap                                       | In-depth, file-specific lobbying analysis with direct quotations and named                           | Limited to a subset of files; no timeline or rapporteur overview; no coverage across                                             |

| Existing instrument | What it does provide                                       | What it does not provide (and the Lobby Dashboard seeks to)                   |
|---------------------|------------------------------------------------------------|-------------------------------------------------------------------------------|
|                     | companies, principally on climate and environmental files. | the full policy spectrum (agriculture, defence, pharmaceuticals and similar). |

*Table 1. Existing transparency instruments and the gap the Lobby Dashboard addresses.*

### 2.3 Empirical grounding: what the fourteen dossiers show

The case for such an instrument is not only theoretical; it was confirmed empirically during construction of the dossiers. Recurring findings — set out in full in the accompanying synthesis document — include a documented spending asymmetry reaching a factor of eighteen in one policy area; interest representatives holding senior Commission meetings without the prior registration that is formally a precondition for such meetings; and at least one file (SAFE) in which the European Parliament's ordinary legislative role was bypassed entirely through an emergency legal basis. None of these findings was assumed in advance. Each emerged from source research on an individual file, which underlines the added value of a dossier-level, empirical approach over a purely theoretical justification.

### 3. Dossier selection

Dossiers were selected against three criteria: a demonstrably asymmetric or strongly polarised contest between interests; an active negotiation or implementation phase; and sufficient public visibility for a citizen to recognise the outcome. Applying these criteria produced fourteen dossiers, deliberately spread across the legislative life cycle — from files concluded several years ago to one tabled two days before the corresponding page was compiled.

| Dossier                                            | Stage at time of compilation            | Reason for inclusion                                                                                                 |
|----------------------------------------------------|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| Digital Markets Act                                | In force since Nov 2022                 | Landmark gatekeeper regulation with an unusually well-documented lobbying record.                                    |
| Artificial Intelligence Act (original negotiation) | In force since 2024                     | Named meeting disclosures available via the Parliament's own procedure file (OEIL).                                  |
| Digital Services Act                               | In force; enforcement contested         | Sister file to the DMA; same platforms, same lobbying dynamic.                                                       |
| Digital Omnibus on AI                              | Council green light Jun 2026            | Very recent file; demonstrates honestly-labelled data gaps where no record yet exists.                               |
| Omnibus I (CSRD/CSDDD)                             | In force since Mar 2026                 | Openly contested: a lead negotiator resigned; a rapporteur threatened to vote with the far right.                    |
| CSAM Regulation ('chat control')                   | Unresolved; trilogue collapsed Jun 2026 | The only file still genuinely undecided; three-way contest between platforms, security interests and digital rights. |
| Pharmaceutical legislation reform                  | Political agreement reached             | Two rapporteurs with documented opposing starting positions.                                                         |
| EU–Mercosur agreement                              | Provisionally applied May 2026          | A quantified inducement (€45bn), a 334–324 vote, and provisional application despite a pending court referral.       |
| Packaging and Packaging Waste Regulation           | In force; applies from Aug 2026         | Widely described as the most heavily lobbied EU file to date; named companies documented.                            |

| Dossier                                     | Stage at time of compilation                     | Reason for inclusion                                                                               |
|---------------------------------------------|--------------------------------------------------|----------------------------------------------------------------------------------------------------|
| Platform Work Directive                     | Adopted; transposition due Dec 2026              | File-specific lobbying budgets available; rapporteur publicly quoted a company's lobbying message. |
| Multiannual Financial Framework 2028–2034   | Early negotiation                                | Contested principally between institutions and member states rather than private interests.        |
| Common Agricultural Policy reform post-2027 | Early stage; trilogue not started                | Well-documented historical precedent for timing used as a lobbying instrument.                     |
| EU climate framework post-2030              | 2040 target in force; ETS review tabled Jul 2026 | Two files at opposite ends of the life cycle on a single page.                                     |
| SAFE (defence instrument)                   | Adopted May 2025; court case pending             | Raises a decision-making-process question rather than an industry-versus-civil-society one.        |

*Table 2. The fourteen dossiers, their stage at compilation, and the reason for inclusion.*

This spread is deliberate. It demonstrates the instrument's behaviour both at the point where a file has a mature documentary record and at the point where almost nothing has yet been published about it — the latter being precisely where the temptation to estimate is greatest and where the instrument's treatment of data gaps is therefore most visible.

## 4. Methodological approach

### 4.1 Design principles

- One file, one page, one central question: who is seeking to shape this, and how balanced is that picture?
- Separation of content and justification: each page carries a 'Dossier' tab written for the citizen and a separate 'Notes & Methodology' tab consolidating all sources, caveats and methodological choices, so that the main page remains readable without sacrificing verifiability.
- A consistent base structure across all dossiers, with deliberate and explained deviations where the nature of the file requires them (see 4.7).
- No invented precision: where no reliable figure or name is available, this is stated explicitly as a data gap rather than estimated or silently omitted.
- Symmetrical presentation: opposing positions are shown where documented, including direct quotations from industry associations alongside those from civil-society organisations on the same file.

### 4.2 Building blocks per dossier page

Each page is built from a fixed core of components, adapted per file where the underlying procedure requires it.

| Building block                      | What it shows                                                                                                             | Basis and constraint                                                                                        |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Documented lobbying pressure        | A balance or ratio indicator between corporate lobbying and civil-society counterweight, where a reliable source permits. | Only shown where a published analysis exists; otherwise replaced by a stated gap.                           |
| Documented interest representatives | A ranked list of organisations engaged on the file.                                                                       | Ranking reflects prominence in the sources used, not a verified meeting count; stated as such on each page. |

| Building block                                    | What it shows                                                                                                                                                                      | Basis and constraint                                                                                                             |
|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Timeline                                          | The formal procedural steps, from Commission proposal to (provisional) conclusion.                                                                                                 | Drawn from official EU sources (Legislative Train Schedule, OEIL, Council records).                                              |
| Rapporteur(s) or negotiators                      | The parliamentary or other key figures, with their role.                                                                                                                           | Explicitly marked as not applicable where the procedure provides no rapporteur (international agreements, emergency procedures). |
| Indicative order of magnitude of lobbying budgets | A bandwidth per stakeholder group, with individual organisations broken out separately only where their own declared budget exceeds approximately 10% of the combined total shown. | Declared annual organisation-wide budgets; never a file-specific amount (see 4.3).                                               |
| What has this achieved                            | A small number of well-documented points of contention, each assessed against the original Commission proposal.                                                                    | Manually curated; explicitly non-causal (see 4.4).                                                                               |

*Table 3. Building blocks of a dossier page.*

#### **4.3 Why lobbying budgets are shown as an order of magnitude, not a file-specific figure**

The Transparency Register discloses an organisation's total annual lobbying expenditure as a band, covering all its activity across all files. No mechanism exists, in any public source, for apportioning that figure to an individual legislative file. Presenting a file-specific euro amount would therefore require assuming that an organisation's budget is distributed evenly across its dossiers — an assumption that cannot be substantiated and would produce a figure with the appearance of precision and none of the substance.

The dashboard therefore presents budgets as a bandwidth per stakeholder group first, and breaks out individual organisations only where a single organisation's declared budget exceeds roughly 10% of the combined total shown on that page. The 10% threshold is a presentational convention rather than an empirically derived value: it is set high enough that the organisations named are materially significant within the total shown, and low enough that a page does not reduce to a single name. Where an organisation is plausibly above the threshold but no confirmed figure was found, this is stated rather than inferred — as on the Digital Markets Act page for Apple and Amazon.

#### **4.4 The outcome assessment: documented alignment, not proven causation**

The question of what lobbying actually achieved is the most methodologically demanding element of the instrument. A final text that matches an advocated position demonstrates alignment, not that the advocate caused the outcome. Three obstacles are structural: multiple actors frequently advocate the same change, so no single actor's contribution can be isolated; outcomes are rarely binary but graduated, with provisions weakened or strengthened by degree; and the counterfactual — what would have occurred without a given intervention — is by definition unobservable.

For these reasons the dashboard uses a small number of manually curated points of contention per file rather than an automated score. The approach draws on, but is deliberately more modest than, the 'preference attainment' method used in political science, in which researchers code each stakeholder's explicit position on a defined set of contested provisions and compare those positions to the final text. It also takes account of the precedent set by LobbyPlag (2013), which compared verbatim textual suggestions in lobbying documents to amendments tabled during the General Data Protection Regulation negotiations — a method that works only where an organisation publishes concrete amendment text, which is not systematically the case.

Each point of contention is therefore presented in a fixed form: the position in the Commission's original proposal, the corresponding provision in the final text, a qualified assessment (strengthened, weakened, retained, or

unresolved relative to that proposal), and a separate note identifying which actors are documented as having advocated in which direction. The assessment describes the movement of the text, not the attribution of that movement to any named party.

This design also captures cases that a simple win-or-lose framing would misrepresent. On the pharmaceutical file, the industry opposed a reduction in automatic market protection while the overall outcome was nonetheless more favourable than the Commission's original proposal: 'weakened relative to the status quo' and 'strengthened relative to the proposal' are simultaneously true of the same provision. On the Platform Work Directive, the removal of fixed criteria from the operative text — which reads as a weakening — was advocated by the worker-protective side as the stronger option, on the reasoning that a rigid checklist is easier to engineer around than a broader presumption.

#### **4.5 Treatment of data gaps**

Where reliable data are unavailable — an undeclared lobbying budget, an unconfirmed shadow rapporteur, a file too recent to have accumulated a documentary record — this is marked consistently as an explicit gap, rendered in a fixed visual style recognisable across every page. This choice is material to the instrument's credibility: an estimate that later proves wrong undermines confidence in the whole, whereas an acknowledged gap reinforces it. In several instances the gap is itself a finding. On the Platform Work Directive, two lobbying associations active on the file had declared no budget at all in the Transparency Register despite holding multiple senior Commission meetings, for which registration is formally a precondition.

#### **4.6 Source hierarchy and verification**

Official EU sources are used wherever possible: the Transparency Register, the Legislative Observatory (OEIL) including meetings disclosed under Rule 11, the Legislative Train Schedule, Council records, and the Official Journal. For lobbying-specific interpretation — who met whom, who spent what, which position was advocated — these are supplemented by specialist investigative journalism and non-governmental trackers, principally Corporate Europe Observatory and InfluenceMap, together with academic literature and, for very recent files, procedural analysis published by law firms. Each page states in its 'Notes & Methodology' tab which source supports which specific claim, rather than presenting an undifferentiated bibliography.

#### **4.7 Deliberate deviations from the standard structure**

Three files depart from the standard page structure because the underlying procedure differs fundamentally. The EU–Mercosur agreement is an international agreement ratified through the consent procedure, in which Parliament votes to approve or reject rather than to amend; it therefore has no rapporteur panel. The Multiannual Financial Framework requires unanimity in Council plus Parliament's consent and, at the stage documented, had no single rapporteur report. SAFE was adopted under Article 122 TFEU, an emergency legal basis that excludes Parliament's ordinary legislative role altogether, so the page documents the European Economic and Social Committee's advisory rapporteurs and the institutional dispute instead. In each case the deviation is stated on the page itself rather than left for the reader to infer.

### **5. Limitations in use**

- Point-in-time snapshot: each page reflects the state of documentation at its compilation date (generally mid-July 2026). For files still under negotiation — including the CSAM Regulation, the MFF, the CAP reform and the ETS review — the content may be superseded by the time it is read.
- Incomplete file linkage: across several dossiers, approximately half of published parliamentary meeting disclosures carry no procedure number, meaning the instrument necessarily presents an incomplete picture for those files, notwithstanding that this is stated on the page.
- Self-reported financial data without independent verification: figures in the Transparency Register are declared by the registrants themselves and are not independently audited.
- Potential selection and source bias: the non-governmental trackers and investigative journalism relied upon — principally Corporate Europe Observatory and related organisations — hold a declared critical stance toward corporate lobbying. Opposing quotations are included where available, for example

PlasticsEurope alongside EPN on the packaging file, but a fully neutral source base was not available for every dossier.

- No proven causation: as set out in 4.4, the outcome assessment demonstrates documented alignment between an advocated position and the final text, never an established causal relationship.
- Uneven applicability of the template: for international agreements, budgetary negotiations and emergency procedures, the underlying procedure differs fundamentally from ordinary legislative files, which limits comparability between dossiers even where each individual page is internally sound.
- Manual maintenance: in its present form the instrument is a manually compiled set of pages, not a live-linked database. Updating requires repeating the source research per file.
- Language: the dossier pages are written in English, following the source language of substantially all material used. This may limit accessibility for Dutch-speaking readers relative to the Dutch-language editorial context in which the instrument is published.
- Not a measure of legitimacy: a high volume of documented lobbying is not in itself evidence of improper conduct. Interest representation is a lawful and expected part of legislative process; the instrument documents its distribution and visibility, not its propriety.

## 6. Source overview

The table below sets out the principal categories of source used across the fourteen dossiers. A complete, file-specific attribution is given in the 'Notes & Methodology' tab of each individual page.

| Category                                               | Examples of sources used                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Official EU sources                                    | EU Transparency Register; European Parliament Legislative Train Schedule; EP Legislative Observatory (OEIL), including meetings disclosed under Rule 11; EP press releases and EPRS briefings; Commission meeting disclosures; Official Journal of the European Union; Council of the EU / Consilium press releases and timelines; European Economic and Social Committee opinions and event programmes; European Defence Agency data. |
| Investigative journalism and non-governmental trackers | Corporate Europe Observatory (including 'The Lobby Network', 'Uber Files 2', 'The Lobbying Ghost in the Machine'); LobbyControl; InfluenceMap Europe; Transparency International EU / Integrity Watch EU; Business & Human Rights Resource Centre; European Digital Rights (EDRI); Access Now; Electronic Frontier Foundation; SOMO; Politico Europe; Euronews; Food Packaging Forum; Climate Social Science Network.                  |
| Academic and legal analysis                            | Journal of Common Market Studies; Journal of European Integration; Eyes on Europe; specialist law and advisory firms (including Bird & Bird, CMS, Osborne Clarke, Gibson Dunn, Hogan Lovells, Simmons & Simmons) for procedural and technical-legal interpretation of recent files.                                                                                                                                                    |
| Sectoral and institutional actors themselves           | Direct quotations and statements from parties to a file (including EFPIA, PlasticsEurope, EPN, Eurofer, ASD, and individual Members of the European Parliament), used as a documented position and never as an objective measure of an outcome.                                                                                                                                                                                        |

*Table 4. Principal source categories used across the fourteen dossiers.*

## 7. Why this dashboard serves an essential transparency function

This chapter states directly why the combination described in chapters 1 to 6 fulfils a role not otherwise met within the existing EU institutional and civil-society landscape.

- It closes the gap between existing data and citizen accessibility. The Transparency Register, the Rule 11 meeting disclosures and the Commission's own records are public but fragmented, technical and

unconnected to any narrative; the dashboard reassembles them into a form a non-specialist can navigate for a single file within minutes.

- It is organised by legislative file rather than by organisation or by Member. Existing instruments answer 'what does this organisation spend' or 'whom did this Member meet'. Neither answers the question a citizen following a specific law is most likely to ask, which is who sought to shape that law and what happened to it.
- It documents the outcome dimension, which no comparable public instrument systematically covers. Setting the final text against the Commission's original proposal on a defined set of contested provisions makes the movement of legislation visible without asserting a causal claim the data cannot support.
- It makes the boundaries of the available evidence part of the output. Data gaps are displayed rather than concealed, which converts a limitation into information: a lobbying association holding senior meetings while declaring no budget is itself a finding about the transparency regime, not merely a missing cell.
- It makes its own choices auditable. Every selection criterion, presentational convention and assessment rule is stated and justified in this document, precisely so that a critic can contest a specific, named choice rather than the instrument as an unaccountable whole.

## **8. Concluding statement**

The Lobby Dashboard is not peer-reviewed academic research and does not present itself as such. It is a journalistic and analytical instrument, assembled from the best available public sources, with an explicit and consistently applied separation between what has been established, what is indicative, and what is a documented position held by a named party. That separation — visible on every page in the form of source attributions, stated bandwidths and acknowledged gaps — is not a shortcoming of the instrument but the substance of its contribution: to give the citizen insight into who seeks to shape a piece of Union legislation, and equally to show honestly where the limit lies of what can be said about that with confidence.