

Greenpeace European Unit

199 rue Belliard, 1040 Brussels, Belgium T +32 (0)2 274 1900 | F +32 (0)2 274 1910 european.unit@greenpeace.org www.greenpeace.eu | @GreenpeaceEU EU transparency register: 9832909575-41 Non-profit registration (vzw/asbl): BE0457563648

Roberta Metsola President of the European Parliament European Parliament

By electronic mail

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Re: How Russian lobbyists may be circumventing the ban on entering the European Parliament

Dear President,

I am writing to congratulate you on banning lobbyists representing Russian state interests from entering the European Parliament. However, I want to alert you that, despite the ban, companies such as Gazprom, Lukoil and Rosatom continue to retain indirect access to the European Parliament and exert influence through lobby groups including the European Energy Forum, the Brussels Energy Club, FuelsEurope, EDF, and the World Nuclear Association.

In order to explain how this is the case, I share with you our report, 'Russian dolls: how Russian companies lobbied for the EU Taxonomy to include fossil gas and nuclear energy', which examines Russian lobbying directed at the EU taxonomy of sustainable investments. Some of the more illustrative examples detailed in the report include:

- Gazprom exerted influence on the taxonomy via its German subsidiary Gazprom Germania, which until recently operated the Nord Stream 2 pipeline project on behalf of Gazprom. Gazprom continues to be represented in taxonomy discussion in Brussels by lobby associations such as Gas Infrastructure Europe or French gas lobby AFIEG. Gazprom is a member of the European Energy Forum and, again via subsidiaries, the Brussels Energy Club, two groups which have held events, behind closed doors, with EU decision-makers on the taxonomy.
- Lukoil is a member of FuelsEurope, which lists taxonomy as one of the main files it lobbies on.
- Rosatom exerts influence through its many subsidiaries, joint ventures and business dealings, covering all parts of the nuclear production chain. Rosatom is entangled in Europe's nuclear industry. On taxonomy, it used its connections at all levels of the European nuclear industry, most notably with France's state-owned nuclear energy provider EDF, and via its subsidiary RAOS Project's joint venture with Finnish company Fennovoima to build the Hanhikivi 1 nuclear power plant. (Fennovoima cancelled its contract with RAOS Project on 2 May 2022). Rosatom also exerted considerable influence on the taxonomy as a board member of the World Nuclear

Association, including as a platinum sponsor of the 2021 World Nuclear Exhibition, where the keynote speech was delivered by EU energy commissioner Kadri Simson.

In light of this report, we suggest the following:

- European subsidiaries of companies linked to the Kremlin should be banned from having lobby access to the European Parliament;
- Lobby organisations that have such companies as members or clients should be banned from having lobby access to the European Parliament;
- Introduce a ban on EU officials speaking at events (co-) sponsored by Russian state interests, such as the World Nuclear Exhibition.
- Lead by example and stop wasting energy at the European Parliament, as well as switching to 100% renewable energy supplies, namely solar and wind, as well as heat pumps. Please note that biofuels, nuclear energy, or energy from waste incineration should not be part of the Parliament's energy mix due to their harmful environmental impacts.

Yours sincerely,

Jorgo Riss

Executive Director, Greenpeace European Unit