

DIAGNOSIS of BLUE INTEREST GROUPS

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RESUMEN EJECUTIVO

La Sociedad Internacional ha sufrido cambios importantes a lo largo del siglo XX y aún más desde el principio del siglo XXI con respecto a actores y ámbitos de actuación. En estos momentos, el fenómeno del **cambio climático** marca la agenda política internacional buscando remedio a los perjuicios provocados en la flora y fauna terrestre, marina y aérea, y mitigar los impactos negativos en el modo de vida de las personas en todas las regiones del mundo. Una de las iniciativas políticas con más trascendencia es el **Pacto Verde Europeo** de la Unión Europea (UE) y sus múltiples estrategias y actos legislativos.

Otra característica de la sociedad internacional en el último siglo es, sin duda, la aparición de nuevos actores que influyen en debates, agendas y decisiones políticas, como son las grandes empresas multinacionales o las organizaciones no gubernamentales (ONGs). Utilizamos una denominación más genérica en este documento que son los **grupos de interés** (GI) que tienen una especial relevancia en los debates relacionados con el cambio climático, dada la necesidad para la humanidad de la búsqueda del crecimiento sostenible en sus tres vertientes -social, económica y medioambiental- como un objetivo universal. Se define, de manera genérica, a una GI como actores cuyo **objetivo es influir en la política para conseguir un resultado político favorable para su propio grupo o para la causa que representan.**

Los GI son **importantes** en las democracias **liberales** porque agregan intereses y los trasladan a las instituciones que toman decisiones, las que influyen sobre las personas jurídicas y físicas. Por el hecho de que **ningún GI es elegido por los ciudadanos, pero intenta influir en la política**, la **transparencia** de su organización y financiación es **fundamental** para la **calidad democrática**. Por lo tanto, deben admitirse las siguientes preguntas a la hora de examinar cualquier GI:

qué INTERESES representan

a QUIÉNES representan

de qué RECURSOS disponen

En el presente documento analizamos **GI azules con influencia en la Unión Europea que tratan temas de gestión pesquera en un sentido amplio, y pretendemos dibujar una imagen de estos GI.**

Dividiremos estos actores no gubernamentales en **GI empresariales**, como pueden ser las asociaciones empresariales, y **GI conservacionistas**, como las ONGs. La UE ha procurado en las últimas décadas aumentar y reforzar la participación de la sociedad civil en el proceso político, incluida la materia de **gestión pesquera sensu lato**. La UE creó para ello los **Consejos Consultivos de la Unión Europea (CC)** cuyo fin es proporcionar tanto a los Estados miembros como a la Comisión Europea **recomendaciones relacionadas con la gestión pesquera a lo largo de la cadena de valor**. Por ello, en este documento analizamos los GI que participan en el Consejo Consultivo de Flota de Larga Distancia (**LDAC**) y en el Consejo Consultivo de Mercados (**MAC**) preguntándonos por sus intereses, a quién representan y de que recursos disponen; la información se obtiene mediante los datos publicados por los GI o por portales de transparencia accesibles públicamente.

A continuación, se presentan **algunas conclusiones** del análisis de los GI azules.

- **INTERESES que REPRESENTAN**

Los **GIs empresarial** a nivel europeo que representan los sectores privados son asociaciones **compuestas por organizaciones nacionales**, y muchas de éstas, a su vez, aglutinan asociaciones subnacionales y empresas individuales. Los **intereses que representan son evidentes**: cada asociación defiende los intereses empresariales de sus miembros, es decir, la pesca extractiva, la transformación o comercialización. En nuestra opinión, los GI económicos presentan objetivos más centrados, es decir que están interesados en la gestión sostenible de los recursos marinos a la vez que consiguen escenificar no sólo esta vertiente medioambiental, pues como su mismo nombre indica buscan soluciones para que el sector sea viable, lo cual precisa a su vez de unas consideraciones sociales. A pesar de su denominación, no buscan un beneficio económico *per se*, si no que intentan que las **condiciones en las que operan sus miembros sean factibles**, concretamente en el caso de la pesca se busca el **uso sostenible de los recursos para poder continuar con la actividad económica**, que los beneficios de las empresas que conforman las organizaciones sean rentables para su continuidad y que se fortalezca la cohesión y estabilidad de los grupos sociales concretos del sector.

En cambio, en el caso de los **GI conservacionistas** surge la pregunta de **a quién representan**. Las **causas** por las que se involucran son **más universales**. Se comprometen a salvar los océanos y mares, la lucha por una mayor protección de la

biodiversidad marina o reducir los impactos negativos de la pesca solo son algunos temas entre muchos otros. Muchos GI quieren contribuir a lograr **objetivo “30x30”**, es decir conseguir una protección de un 30% de los océanos. Por su interés en la dimensión medioambiental del concepto de la sostenibilidad, sus actividades influyen indudablemente en la gestión pesquera, y es por ello que participan en los Consejos Consultivos mencionados anteriormente.

Estos GI cuentan con una organización diferente que se parece, en nuestra opinión, a una estructura más horizontal en el siguiente sentido. Algunos GI **fueron fundados por otras organizaciones** de la sociedad civil y así están **vinculados con éstas** no solo de manera **organizativa** sino también desde el punto de vista **financiero**. Existen, por otro lado, GI que fueron fundados por individuos y reciben fondos de varias fuentes que pueden ser otras fundaciones, del sector público, empresas, y de personas porque prácticamente en todas las entidades, particulares pueden ser miembros y aportar económicamente a la organización. Por esa somera visión de conjunto, cabe constatar que las **fuentes de financiación son más variadas** que de las organizaciones empresariales. Quizás sea por dedicarse a defender intereses más amplios por lo que les resulte más fácil crear alianzas paneuropeas e internacionales, y así potenciar su influencia. El mundo de los GI conservacionistas es más variopinto y es por ello por lo que no solo se **han incluido en este documento los GI conservacionistas europeos** que forman parte de los dos Consejos Consultivos, sino también las **entidades fundadoras o las que participan en su financiación**.

NÚMERO REDUCIDO de entidades que TIENEN UNA GRAN PRESENCIA

En ambos grupos de GI azules organizados a nivel europeo – es decir, tanto empresariales como conservacionistas – predominan unas pocas organizaciones.

En cuanto a los **GI empresariales** destacan, por un lado, EUROPEÛCHE que es la *Asociación de las Organizaciones Nacionales de Empresas Pesqueras de la UE* que reúne a 15 organizaciones nacionales de 8 Estados miembros (más una organización de Islandia), y así representando aproximadamente a 45.000 buques. Y, la EAPO, la *Asociación Europea de Organizaciones Productoras Pesqueras*, que representa a 28 organizaciones de productores de 9 Estados miembros de la UE, y así aproximadamente 10.000 buques. Por otro lado, mencionar la *AIPCE-CEP* que representa las asociaciones nacionales de transformadores y comerciantes de pescado de la UE.

Los **GIs conservacionistas** organizados a nivel europeo en los dos CC que destacan por sus publicaciones, capacidad de hacer campañas y su nivel de popularidad en la población civil, son *Oceana*, *Clientearth*, *Pew* y el *WWF EPO*. Estas organizaciones

disponen de fondos importantes, de acuerdo con la información públicamente accesible (ingresos totales – no solo en relación con intereses azules):

- **Pew: 201 millones \$ (2022)**
- **Clientearth: 33,9 millones € (2024)**
- **Oceana Europa: 3 millones € (2021)**
- **WWF EPO: 5,3 millones € (2022)**

Por sus colaboraciones con otras organizaciones a nivel internacional, atendemos más allá de los GI europeos y, de nuevo, observamos una presencia dominante de un número reducido de entidades que disponen de fondos financieros muy relevantes como son, a modo de ejemplo:

- ***Conservation International*** con ingresos totales de **217 millones \$** y que participa en Deep Sea Conservation Coalition
- *Gordon & Betty Moore Foundation* que contribuyó con **6 millones** al lanzamiento de *Blue Nature Alliance for Ocean Protection* (Proyecto de Conservation International)
- *Oceankind* (una empresa) que concedió a la alianza *OCEANS 5* una contribución de **5 millones \$** (36 meses)

Además de disponer fondos muy relevantes, se crean iniciativas conjuntas como es el siguiente ejemplo:

“Protecting Our Planet Challenge”¹

- Trasfondo: “Largest-ever private funding commitment to biodiversity conservation”
- Objetivo: Conservación de la biodiversidad, conseguir “30 x 30” hasta 2030 de tierra, agua y ecosistemas marinos.
- Miembros: 11

*Arcadia [fundadora de Oceans 5]
Bezos Earth Fund
Bloomberg Philanthropies
Bobolink Foundation*

¹

Véase la página web <https://www.protectingourplanetchallenge.org/> (fecha de consulta 21.9.2023)

Gordon and Betty Moore Foundation [fundadora de Oceans 5]

International Conservation Fund of Canada

Re:wild

Nia Tero

Rainforest Trust

Rob and Melani Walton Foundation

Wyss Foundation

- **Presupuesto:** 5.000 millones USD. En junio 2022, anunciaron que iban a invertir como mínimo **1.000 millones USD para la creación, expansión y la gestión de AMP**, y áreas costeras y marinas que están gestionados localmente y/o por indígenas.²
- **Cómo:** Apoyar proyectos en todo el mundo y aumentar la ambición global y nacional; cooperación entre todos los stakeholders; especial mención a reforzar la capacidad para gestionar y monitorizar la efectividad de áreas protegidas.

TRANSPARENCIA en la FINANCIACIÓN

Como se ha descrito anteriormente, a lo largo del análisis se utiliza información accesible públicamente, incluyendo información sobre el trasfondo de sus creaciones, membresías y financiación. En el contexto de la UE, el **Registro de Transparencia** contribuye significativamente al conocimiento de la cantidad de financiación de la que disponen las entidades. Además, todas las organizaciones deben presentar un informe financiero anual firmado por un contable para poder seguir en el Registro. Aun así, existen **tres inconvenientes** para ambos grupos de GI.

En primer lugar, existe una categoría relacionada con los fondos de los que dispone la organización que se denomina “*Estimación de los costes anuales atribuibles a las actividades cubiertas por el Registro*”. El esfuerzo de influir sobre la política europea va mucho más allá de reunirse con personal de la Comisión o contribuir a consultas públicas – y estas actividades (como por ejemplo campañas o publicar estudios) no están cubiertas por esa categoría.

En segundo lugar, en muchos casos las cifras sólo indican intervalos (p.ej. “100.000 a 199.999€”) por lo que el gasto puede variar considerablemente. En otros casos, la organización introduce el presupuesto total, pero tampoco se sabe si es el presupuesto total de la entidad para todas sus actividades (más allá de la pesca).

² Véase Moore Foundation, “Philanthropic organizations commit \$1B USD to help protect 30 percent of the ocean by 2030”, [https://www.moore.org/article-detail?newsUrlName=philanthropic-organizations-commit-\\$1b-usd-to-help-protect-30-percent-of-the-ocean-by-2030](https://www.moore.org/article-detail?newsUrlName=philanthropic-organizations-commit-$1b-usd-to-help-protect-30-percent-of-the-ocean-by-2030) (fecha de consulta 28.2.2023)

En tercer lugar, no se indica **cómo se financian** – si se financian a través de cuotas de sus miembros, de empresas, o si reciben donaciones de ciudadanos o de grandes fundaciones internacionales. Esa **deficiencia es la más preocupante para la calidad democrática** porque la representación de intereses no solo se deduce del programa de trabajo o de la membresía, sino muchas veces por quién lo está financiando. La política pública europea es demasiado importante para que se permitan posibles “agendas ocultas”.

Los **GI empresariales** publican de acuerdo con las normas del Registro de Transparencia los intervalos de los gastos que utilizan para llevar a cabo las actividades descritas en el Registro. Sin embargo, no son datos desglosados y concretos, y se desconoce su financiación incluso visitando sus páginas web. A pesar de ese inconveniente, las **fuentes de sus financiaciones sí son evidentes** porque son contribuciones de sus asociaciones nacionales y/o de empresas. Y, estrechamente relacionado con ello también está **claro a quién y a qué interés representan**.

En cambio, en cuanto a los **GI conservacionistas**, la situación es más compleja. En nuestra opinión, el grado de transparencia **depende considerablemente de su personalidad jurídica** y las obligaciones relativas que tienen que cumplir. Así por ejemplo las organizaciones “Section 501 (c)” estadounidenses son **muy transparentes** y se puede acceder a sus declaraciones tributarias en las que se encuentra la información de sus ingresos, gastos y patrimonio además de los destinatarios que reciben fondos de sus arcas. Sin embargo, en muchas entidades analizadas en este documento, los informes y cuentas anuales proporcionan **información no desglosada**; si bien es verdad que se suele poder averiguar cuánto dinero en total se **recibió de parte de donantes, pero no quiénes son** en concreto. Además, aunque sí se suele encontrar quiénes son los colaboradores o incluso los donantes, pero (de nuevo) en muchos casos no se sabe en qué exactamente consiste esa colaboración. Esa situación **difusa** se complica aún más cuando las entidades reciben fondos de los llamados “*donor-advised funds*” porque en este constructo el origen de las donaciones no es público – a no ser que el donante quiere hacerlo público.

EXECUTIVE SUMMARY

International society has undergone major changes throughout the 20th century and even more so since the beginning of the 21st century with regard to actors and spheres of action. The phenomenon of **climate change** marks the international political agenda of today where actors are seeking to remedy the damage caused to flora and fauna on land, at sea and in the air, and to mitigate the negative impacts on people's way of life in all regions of the world. One of the most outstanding policy initiatives is undoubtedly the European Union's (EU) **European Green Deal** and its multiple strategies and legislative acts.

Another change of international society has undoubtedly been the emergence of non-state actors that influence debates, agendas and political decisions, such as large multinational companies or non-governmental organisations (NGOs). We use a more generic term in this document, **interest groups** (IGs), which are particularly relevant at this time, given the need for humanity to find a way to guarantee sustainable growth in its three dimensions - social, economic and environmental. An IG is defined generically as **actors whose objective is to influence policy in order to achieve a favourable policy outcome for their own group or for the cause they represent**.

IGs are **important in liberal democracies** because they aggregate interests and transfer them to decision-making institutions whose decisions influence legal and natural persons. Because **no IGs are elected** by citizens, but seek to influence policy, **transparency of their organisation and funding is fundamental to democratic quality**. Therefore, the following questions should be admitted when examining any IG:

what INTERESTS do they represent

WHO do they represent

what RESOURCES do they have

In this analysis we will deal with different **blue IGs** with **influence in the European Union** that deal with **fisheries management issues in a broad sense**, and we intend to draw a picture of these IGs.

We divide these non-state actors into **business IGs**, such as business associations, and **conservationist IGs**, such as non-governmental organisations (NGOs) with a more horizontal structure. In recent decades, the EU has sought to increase and strengthen the participation of civil society in the policy process, including in the field of fisheries management *sensu lato*. The EU created the European Union **Advisory Councils** (ACs) whose purpose is to provide both Member States and the European Commission with **recommendations related to fisheries management along the value chain**. Therefore, in this paper we analyse the IGs that participate in the Long Distance Fleet Advisory Council (**LDAC**) and the Market Advisory Council (**MAC**) by asking about their interests, who they represent and what resources they have at their disposal; the information is obtained through data published by the IGs or through publicly accessible transparency databases.

Some conclusions from the analysis of the blue IGs are presented below.

- **INTERESTS they REPRESENT**

The **economic IGs** at European level that represent the private sectors are **associations made up of national organisations**, and many of these, in turn, bring together sub-national associations and individual companies. The **interests they represent are obvious**: each association defends the business interests of its members, i.e. extractive fishing, processing or marketing. In our opinion, economic IGs have more specific objectives, namely, to contribute to concrete policy decisions on the sustainable management of marine resources while not only focusing on the environmental aspect, but also on economic and social issues to make the sector viable and equitable. Despite their name, they do not seek economic benefit per se, but rather they try to ensure that the conditions in which their members operate are feasible. Specifically, in the case of fishing, they seek the **sustainability of marine living resources** in order to be able to **continue with their economic activity** in a sustainable and profitable way.

In contrast, in the case of **conservationist IGs**, the **question arises as to whom they represent**. They are committed to saving the oceans and seas, fighting for greater protection of marine biodiversity or reducing the negative impacts of fishing are just some of the issues among many others. One of the central themes of many IGs is to contribute to the **"30x30" goal**, i.e. to achieve a 30% protection of the oceans. This is to say that their field of activities is more universal, but they influence in fisheries management issues because they focus on the environmental dimension of sustainability, and that's why they are also present in the Advisory Councils.

These IGs have a different organisation that resembles, in our opinion, a more horizontal structure in the following sense. Some IGs were **founded by other civil society organisations** and are thus **linked to them not only organisationally but also**

financially. There are, on the other hand, IGs that were founded by individuals and receive **funds from various sources**, such as other foundations, the public sector, companies and individuals, because in practically all entities, individuals can be members and contribute financially to the organisation. From this brief overview, the sources of funding are more varied than those of business organisations. In addition, a lot of them participate in pan-European and international alliances, and thus enhance their influence. The world of conservationist IGs is more diverse, and it is for this reason that not only the **European conservationist IGs** that are members of the two Advisory Councils, but **also the founding entities or those involved in their funding, have been included in this document.**

- **REDUCED NUMBER of IGs**

In both groups of blue IGs organised at European level - that is, both business and conservationist groups - a few organisations predominate.

Among the **economic IGs** there is, on the one hand, EUROPÊCHE that is the *Association of National Organisations of Fishing Enterprises in the European Union*, which brings together 15 national organisations from 8 Member States (plus one organisation from Iceland), representing approximately 45,000 vessels. In addition, EAPO, the *European Association of Fishery Producer Organisations*, which represents 28 producer organisations from 9 EU Member States, and thus approximately 10,000 vessels. On the other hand, mention should be made of the AIPCE-CEP, which represents the national associations of fish processors and traders in the EU.

The **conservationist IGs** organised at the European level in the two ACs that stand out for their publications, campaigning capacity and level of popularity among the civilian population are Oceana, Clientearth, Pew and the WWF EPO. For their collaborations with other organisations at the international level, we look beyond the European IGs and, once again, we observe a dominant presence of a small number of entities that have significant financial funds, for example:

- **Pew: \$ 201 million (2022)**
- **Clientearth: € 40 million (2024)**
- **Oceana Europa: € 3 million (2021)**
- **WWF EPO: € 5,3 million (2022)**

In terms of their partnerships with other organisations at the international level, we look beyond the European IGs and, once again, we observe a dominant presence of a small number of entities that have very significant financial funds, such as, for example:

- **Conservation International** with total income of US\$ **217 million** and participates in the Deep Sea Conservation Coalition
- *Gordon & Betty Moore Foundation* who contributed with \$ **6 million** to the launch of the *Blue Nature Alliance for Ocean Protection* (Project of Conservation International)
- *Oceankind* (company) who made a contribution of \$ **5 million** (36 months) to *OCEANS 5*

In addition to making very significant funds available, joint initiatives are created, such as the following example:

“Protecting Our Planet Challenge”³

- **Background:** “Largest-ever private funding commitment to biodiversity conservation”
- **Objective:** Conservation of biodiversity, “30 x 30” until 2030 on earth, water and marine ecosystems.
- **Members:** 11
Arcadia [founder of Oceans 5]
Bezos Earth Fund
Bloomberg Philanthropies
Bobolink Foundation
Gordon and Betty Moore Foundation [founder of Oceans 5]

International Conservation Fund of Canada
Re: wild
Nia Tero
Rainforest Trust
Rob and Melani Walton Foundation
Wyss Foundation
- **Budget:** USD 5,000 million. In June 2022, they announced that they would invest at least USD 1 billion for the creation, expansion and management of MPAs, and coastal and marine areas that are locally and/or indigenously managed.⁴

³ Véase la página web <https://www.protectingourplanetchallenge.org/> (fecha de consulta 21.9.2023)

⁴ Véase Moore Foundation, “Philanthropic organizations commit \$1B USD to help protect 30 percent of the ocean by 2030”, [https://www.moore.org/article-detail?newsUrlName=philanthropic-organizations-commit-\\$1b-usd-to-help-protect-30-percent-of-the-ocean-by-2030](https://www.moore.org/article-detail?newsUrlName=philanthropic-organizations-commit-$1b-usd-to-help-protect-30-percent-of-the-ocean-by-2030) (fecha de consulta 28.2.2023)

- How: Support projects worldwide and increase global and national ambition; cooperation between all stakeholders; special mention of strengthening capacity to manage and monitor the effectiveness of protected areas.

● **TRANSPARENCY in FUNDING**

As described above, publicly available information is used throughout the analysis, including information on the background of their establishment, membership and funding. In the EU context, the **Transparency Register** contributes significantly to the knowledge of the amount of funding available to entities. In addition, all organisations must submit an annual financial report signed by an accountant in order to remain on the Register. However, there are three **drawbacks** for both groups of IGs.

Firstly, there is a category related to the funds available to the organisation called "*Estimated annual costs attributable to the activities covered by the Register*". The effort to influence European policy goes far beyond meeting with Commission staff or contributing to public consultations - and these activities (such as campaigning or publishing studies) are not covered by this category.

Secondly, in many cases the figures only indicate ranges (e.g. "€100,000 to €199,999") so expenditure can vary widely. In other cases, the organisation enters the total budget, but it is also unclear whether this is the total budget of the organisation for all its activities (beyond fishing).

Thirdly, the Registry doesn't indicate **how the IGs are financed** - whether they are funded by membership fees, by companies, or whether they receive donations from citizens or large international foundations. This **deficiency** is the most worrying **for democratic quality** because the representation of interests is not only inferred from the work programme or membership, but often by who is funding it ("follow the money"). **European public policy is too important to allow "hidden agendas"**.

Economic IGs publish in accordance with the rules of the Transparency Register the ranges of expenditures they use to carry out the activities described in the Register. However, these are not disaggregated and concrete data, and their funding is unknown even when visiting their websites. Despite this drawback, the **sources of their funding are evident** because they are contributions from their national associations and/or companies. And, closely related to this, it is also **clear who and what interests they represent**.

For **conservationist IGs**, however, the situation is more complex. In our view, the **degree of transparency depends considerably on their legal status** and the relative obligations they must fulfil. For example, Section 501(c) organisations in the US are very transparent and their tax returns can be accessed to get information on their income, expenses and assets, as well as the recipients of their grants. However, in many of the entities analysed in this document, the annual reports and accounts provide information that is **not disaggregated**, although it is often possible to find out how much money was received from donors, but **not who the donors are**. Moreover, although it is often possible to find out who the collaborators or even donors are, but (again) in many cases it is not known what exactly this collaboration consists of. This fuzzy situation is further complicated when entities receive funds from so-called **donor-advised funds** because in this construct the origin of the donations is not public - unless the donor wants to make it public.

PART A - OBSERVATIONS

1. CONTEXTUALISATION

International society has undergone significant changes throughout the 20th century, and even more so since the beginning of the 21st, with respect to actors and spheres of action. One of these transformations is the emergence of **new actors influencing political debates, agendas and decisions**, such as large multinational corporations and, more recently, non-governmental organisations (NGOs). Another characteristic of the internationalised world is the **recognition of the common interests** of all humanity and, closely related to this, the need to collaborate at a multilateral level. At the heart of these universal interests or values is, on one hand, respect for human rights and fundamental freedoms; on the other hand, the phenomenon of climate change has been placed on the international political agenda, seeking remedies for the damage caused to terrestrial, marine and aerial flora and fauna, and mitigating the negative impacts on people's way of life in all regions of the world. The fight against the consequences and, increasingly, against the causes of **climate change** has gained momentum not only due to greater awareness of the problem, but also thanks to greater coordination between different actors within and out of national borders. States, businesses and research centres have relentlessly sought answers to current challenges through concrete policies to change lifestyles and the way our economies operate. One of the most impactful political initiatives is undoubtedly the **European Green Deal** of the European Union (EU) and its multiple strategies and legislative acts.

1.1. Interest Groups - General Considerations

There are various terms to describe non-governmental actors - stakeholders, representative associations, lobbies, NGOs, etc.; due to space limitations, this discussion is not explored in depth, and throughout this analysis we use a more comprehensive term:

INTEREST GROUP (IG), which refers to various actors whose **objective is to influence politics in order to achieve a favourable political outcome for their own group or the cause they represent**.

IGs exist in all societies and political systems for the simple fact that interests and politics are inseparable. Although all IGs have the same goal, namely influencing politics, their

organisations and strategies vary considerably. Different groups are usually categorised according to the interest they represent⁵.

Among others, there are the so-called **economic interest groups**, which are, so to speak, traditional IGs and have existed for decades, and perhaps this is why they are ubiquitous. This generic concept includes business associations.

Conservationist groups, on the other hand, are a more recent phenomenon because they are involved in promoting common, and in this sense, public interests, such as the fight against climate change or the defense of human rights. While they initially operated at the national or regional level, they are increasingly organising and operating at the supranational level.

IGs play an important role in politics. The influence of IGs on political decision-making processes is part of the DNA of liberal democracies because these IGs aggregate the interests of individuals, thus allowing these **interests to reach the political sphere**. Governments, parliamentarians and public administrations need information about the concerns of all members of the society, and the transfer of **information aggregated through IGs** facilitates legislative development and the implementation of policies aligned with public opinion⁶.

Citizens associate very different things with IGs. Lobbies are associated with business interests and have a rather negative image because a large part of the society believes that groups with significant economic resources "buy" their influence in politics⁷, while the so-called "NGOs" generally enjoy credibility. Academia has been studying the importance of IGs and their impact on politics⁸ for decades. The central question has been, and remains, **what factors determine whether an IG effectively influences** political outcomes. While there are theoretical analyses addressing this issue in general, there are important empirical studies on the US. For the European context, and especially in relation to the EU itself, there remains little work. The EU is a particular case because it is a multi-level political system, much more complex than any state, even a federal one.

⁵ THOMAS, C. S. (2023), "Interest Group", Encyclopaedia Britannica, <https://www.britannica.com/topic/interest-group> (12.7.2023)

⁶ THOMAS, C.S. (2023), *op. cit.*; DÜR, A. / DE BIÈVRE, D. (2007), "The Question of Interest Group Influence", *Journal of Public Policy*, Volume 27, Issue 1, May 2007, pp. 1-12

⁷ DE BRUYCKER, I. / HANEGRAAFF, M. (2023), "The people versus the money: What drives interest group influence in the European Union?", *European Journal of Political Research*, 24.2.2023, <https://doi.org/10.1111/1475-6765.12582>

⁸ For example DAHL, R.A. (1961), *Who Governs? Democracy and Power in an American City*, Yale University Press, New Haven; MILLS, C.W. (1956), *Power Elite*, Oxford University Press, New York; OLSON, M. (1982), *The Rise and Decline of Nations: Economic Growth, Stagflation, and Social Rigidities*, Yale University Press, New Haven

Different lines of research have analysed which type of IGs have the greatest impact:

- those that represent **very specific** or **more generic interests**?
- those **with the most resources** - including financial, human, etc.- or those with fewer resources?
- those whose interests **coincide with public opinion** or those that do not?

A recent analysis of IG influence in the EU reaffirms that both **resources** and the **congruence** of interests **with public opinion** are decisive, and that the two elements are intertwined. In this regard, they conclude that, on the one hand, IGs that represent interests which enjoy broad support in society are more likely to influence political outcomes; and, on the other hand, that public congruence reinforces the power of interest groups with significant resources. The importance of congruence between interests and public opinion is also demonstrated by the fact that, even if an IG has significant financial resources, if its interests are not accepted in society at large, its actions have only limited effects⁹.

1.2. IGs and the European Union

As is well known, **the EU is a sui generis entity** in every sense, and this is also true in relation to decision-making, in which three Community institutions (Commission, Council and European Parliament) primarily interact. During the process of building the European community, the **integration of civil society** - both at the individual level and through interest-representing organisations - has become increasingly important, and for this reason, **the participation of civil society in a broad sense is explicitly provided for** in Article 11 of the Treaty on European Union:

Article 11

1. The institutions shall provide for citizens and representative associations, through appropriate channels, the opportunity to express and publicly exchange their views in all spheres of action of the Union.
2. The institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society.

⁹ DE BRUYCKER, I. / HANEGRAAFF, M. (2023), op. cit.

3. In order to ensure the coherence and transparency of the Union's actions, the European Commission will conduct extensive consultations with the interested parties.
(...)

In 2021, the European Parliament, the Council and the Commission adopted an *Interinstitutional Agreement on a Mandatory Transparency Register*¹⁰, considering that “the collaboration with the interested parties improves the quality of decision-making by providing channels for external opinions and expertise.” (Consideration 2) According to Article 2, an **interest representative** is defined as “any natural or legal person, or formal or informal group, association or network, (...);” that carries out activities “with the **aim of influencing the formulation or implementation of policies or legislation, or the decision-making processes** of the signatory institutions or other Union institutions, bodies, offices and agencies” (Article 3). This Institutional Agreement defines the aforementioned activities as follows (Article 3, paragraph 2):

- “a) organise or participate in meetings, conferences or other events, as well as maintain any similar contact with the Union institutions;
- b) contribute to or participate in consultations, hearings or other similar initiatives;
- c) organise communication campaigns, platforms, networks and on-the-ground initiatives;
- d) prepare or commission policy and position documents, amendments, surveys and opinion polls, open letters and other communication or information materials, and commission and conduct research.”

The EU **Transparency Register**¹¹ was established as early as 2011 - in line with the commitment to promote transparency - for “the registration and monitoring of organisations and self-employed individuals involved in the development and implementation of European Union policies” (Item I.1.). In 2021¹², a new interinstitutional agreement was adopted repealing the previous provisions on the register, with the aim of further strengthening transparency.

¹⁰ Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a Mandatory Transparency Register, *OJEU L 207/1*, 11.6.2021

¹¹ Agreement between the European Parliament and the European Commission on the establishment of a Transparency Register for organisations and self-employed individuals involved in the development and implementation of European Union policies, *OJ L 191*, 22.7.2011

¹² Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory Transparency Register, *OJ L 207*, 11.6.2021

As of December 2024, the **Register had 13,157 entries**¹³ for interest representatives, grouped into the following categories:

- Non-governmental organisations, platforms, networks and similar entities	3,626
- Companies and groups	3,490
- Professional and business organisations	2,640
- Trade unions and professional associations	995
- Think tanks and research entities	590
- Consultancy firms	528
- Other public or mixed organisations	521
- Academic institutions	340
- Associations and networks of public authorities	178
- Self-employed workers	125
- Law firms	73
- Organisations representing churches and religious communities	47
- Entities, offices and networks of third-party states	4

In the area of fisheries and aquaculture, it is essential to mention the **European Union Advisory Councils** (hereinafter AC), which were established by Regulation (EU) No. 1380/2013 on the Common Fisheries Policy "**in order to promote balanced representation of all interested parties**" (Article 43). Conservationist IGs participate in ACs as representatives of the fishing industry. Their main function is to provide both Member States and the European Commission with **recommendations related to fisheries management throughout the value chain**. Deliberations in ACs are based on a spirit of shared interests between the private sector and civil society organisations. They meet regularly and not only discuss issues among themselves, but also frequently invite the European Commission to present assessments or proposals for policies or actions. Both representative groups thus have a direct link with the Commission and can directly convey their views or concerns.

1.3. Blue IGs and the interests they represent

As already mentioned above, the importance of IGs in liberal democracies must be emphasised, as, by defending the interests they represent, they are able to convey those interests to the institutions that make decisions affecting all types of people (both legal and natural). For this very reason, and because they are not elected by citizens, the transparency of these organisations and their funding sources is fundamental to democratic quality. Therefore, the following questions must be addressed when examining any IG:

¹³ See the information available for December 2024 on the following website:
<https://acortar.link/hvGpjK> (04/12/2024)

What INTERESTS do they represent

WHO do they represent

What RESOURCES do they have

As for **business IGs**, the level of transparency regarding both interests and representatives is more evident than with other IGs. Companies and business associations represent the specific interests of industry, which are economic interests, and they intervene to ensure that the regulatory framework is favorable to their business activities. Business IGs are funded by their constituent members, that is, the **funds come directly from companies or other business associations**. In this sense, the **source of funding is clear and the influence objectives of a business IG are explicit**, which favours its transparency. Another issue is the amount of funding available.

The question of **what interests conservationist IGs represent** is more difficult, because the connection between interest and representative base is often **more blurred**, simply because they **represent broader interests**. In the environmental field, these IGs have been formed since the 1970s, and many of them were created at the initiative of "activists" fighting a specific situation or pursuing a specific cause, such as Greenpeace¹⁴. Their perception among the public is generally positive, because they are considered independent from both a political and economic perspective, meaning they are detached from political and commercial interests.

The question of the influence of these IGs on public decision-making processes in democratic countries is not new either, as they are present in virtually all countries, to a greater or lesser extent. There is no doubt that they contribute to public debates to promote a specific idea or cause, which is often called "advocacy." Actions such as participation in hearings, publishing comments, research documents, best practices or debates on current policy issues are also included. It seems that, due to their **positive perception** in society, questions about the **background of the entity**, the **context** and by **whom it was created**, and why it is dedicated to the specific cause it defends are not usually asked. As mentioned above, the EU Transparency Register serves precisely to provide the general public with information about registered organisations. However, although conservationist IGs are listed in the EU Register and the resources available for

¹⁴ See the Greenpeace story at <https://www.greenpeace.org/international/explore/about/50-years/> (consulted on 28.2.2023)

activities related to the EU are indicated, it is not immediately clear **where the funds come from**, unlike with business associations, as noted by the President of the Society of European Affairs Professional (SEAP)¹⁵ [highlighted by the authors]:

‘ “If you’re a commercial entity, whether doing lobbying as an in-house activity or through a trade association, it’s pretty clear that your money comes from your profit [...] there is no surprise that the trade association for cars is being funded by the sales of the car manufacturers,” he said.

But the transparency problem arises with associations and NGOs with multi-layer funding.

“There are NGOs which declare that their funding comes from foundations from within or outside Europe, but the donors behind these foundations are not often disclosed,” Varakas said. ’

Blue conservationist IGs in the EU and the US

There is a difference between blue conservationist IGs operating in the EU and the US. While in the EU, participation and contact with the EU are, so to speak, regulated through the Transparency Register, the situation in the US is different. Under the Internal Revenue Code (US tax code)¹⁶, charities that meet specific requirements for “section 501(c)(3)” are themselves exempt from taxation and can receive tax-deductible contributions. However, the regulations establish limitations on their activities, and thus they cannot be “action organisations” in the sense that they “may not attempt to influence legislation as a substantial part of their activities”¹⁷. There are restrictions on the influencing activities of 501(c)(3) organisations, and a “substantiality test” is usually carried out. If the activity exceeds a certain scope or amount, they may be taxed or lose their tax-exempt status.

¹⁵ MICHALOPOULOS, S. (3.2.2023), “EU lobbyists boss urges for more transparency on NGO’s donors”, <https://www.euractiv.com/section/politics/news/eu-lobbyists-boss-urges-for-more-transparency-on-ngos-donors/> (consulted on 14.7.2023)

¹⁶ See the information provided by IRS on the following webpage and its links <https://www.irs.gov/charities-non-profits/charitable-organizations/exemption-requirements-501c3-organizations#:~:text=To%20be%20tax%2Dexempt%20under,any%20private%20shareholder%20or%20in%20dividual> (consulted on 28.2.2023)

¹⁷ See: <https://www.irs.gov/charities-non-profits/charitable-organizations/exemption-requirements-501c3-organizations#:~:text=To%20be%20tax%2Dexempt%20under,any%20private%20shareholder%20or%20in%20dividual> (fecha de consulta 28.2.2023)

2. METHODOLOGY

2.1. Selection criteria

European Sphere of Action. As mentioned above, measuring the influence of stakeholders on policy is challenging. This document does not aim to contribute to a theoretical debate, but rather to draw a **picture of the European Blue IGs that seek to influence fisheries management policy**. The **objective** of this report is to provide an initial analysis of the world of **business IGs** and **conservationist IGs registered as European organisations**¹⁸ whose objectives are to **promote the sustainable use of fisheries resources and protect the marine environment** in a broad sense. This is because their presence in decision-making and advocacy capacity - that is, the promotion of the ideas they represent - has increased considerably in recent years. In the European context, it is worth remembering that the conservation of fisheries resources is an exclusive policy, while environmental policy is a shared policy; however, there is an increasing connection between the two policy areas, reflected in the European Green Deal process.

2.2. Selection steps

Step 1: PARTICIPATION in MAC & LDAC

The ACs were created precisely for the purpose of institutionalising exchanges between European institutions on fisheries issues, in which different interests are represented on an equal footing. Two of the ACs address cross-cutting issues in fisheries management, namely:

- **Long Distance Fleet Advisory Council (LDAC)**, whose main objective is to promote the conservation of marine biodiversity and the sustainable use of fishery resources.
- **Market Advisory Council (MAC)**, which addresses issues related to markets for fishery and aquaculture products.

The interest groups **organised at the European level** that are part of MAC and LDAC are the following:

¹⁸ This means that national IGs were excluded.

	IGs representing the private sector	Conservationist IGs
MAC		
	AIPCE	CLIENTEARTH
	CEP	EUROCOOP
	COPA-COGECA	ETF
	EAPO	OCEANA
	EUROPECHE	WWF
	EUROTHON	
	FRUCOM	
	EuroCommerce	
LDAC		
	AIPCE-CEP	EJF
	CONXEMAR*	ETF
	EUROPECHE	OCEANA
	EUROTHON	PEW
	FRUCOM	WWF
	GLOBAL TUNA ALLIANCE	
	IPNLF	

* Not included in the analysis as it is a national association

Step 2: INCLUDE PARTNERS

Guiding the analysis based on the three questions posed above - **what interests, who represents IGs and how do they do it** - a difference was observed in organisational structure, funding and the topics addressed between business and conservationist IGs, which **led to an expansion of the number of conservationist IGs described in this document**.

The **business IGs** representing the private sectors at European level are associations **composed of national organisations**, and many of these, in turn, bring together subnational associations and individual companies. Therefore, in our opinion, these organisations have a vertical structure. Funding cannot be directly derived from all of them, but it is known that they are supported by contributions from their members. The **interests they represent are obvious**: each association defends the business interests of its members, i.e., extractive fishing, processing or marketing. Perhaps this is why business associations have not created broader international alliances or networks - with a few exceptions - and beyond *ad hoc* collaboration, because they represent very specific interests, related to their business activities in the narrowest sense.

In contrast, **conservationist IGs** have a different organisation that resembles, in our opinion, a more horizontal structure in the following sense. Some IGs **were founded by other** civil society **organisations** and are thus **linked to them** not only **organisationally** but also **financially**. On the other hand, there are IGs founded by individuals and receive funding from various sources, including other foundations, the public sector, companies and individuals, because in virtually all entities, individuals can be members and contribute financially to the organisation. From this brief overview, it is worth noting that the **sources of funding are more varied** than those of business organisations. Although the IGs present in the aforementioned Advisory Councils are interested in fisheries management, the causes for which they are involved are more universal. They are committed to saving oceans and seas, fighting for greater protection of marine biodiversity and reducing the negative impacts of fishing. These are just a few topics among many others. Perhaps it is because they are dedicated to defending broader interests that it is easier for them to create pan-European and international alliances, thus strengthening their influence. The world of conservationist IGs is more diverse, and for this reason, not only the **European conservationist IGs** that are members of the two Advisory Councils **have been included in this document**, but also the **founding entities or those that participate in their funding**.

2.3. Access to information

We intend to include only **publicly accessible information, preferably from the entity itself**, compiled from its websites, annual reports and audit reports. The search has been supplemented by using information from public administrations such as the **European Union Transparency Register** or the Charity Commission (United Kingdom). In some cases, information provided by other research websites has been included. We indicate all sources in footnotes so that anyone interested can verify the source of the information.

The collection and presentation of information has been systematised. The information sheet for each entity includes the following:

- Summary of the entity (data on its creation and current information)
- Spheres of action
- Economic and financial situation (income, expenses, assets - public funds, private funds, grants awarded to whom, partners)

- Observations (if applicable) on the special features of the entity

The **information sheets** for each entity can be consulted in **PART B**.

3. CHARACTERISTICS of the interest groups

The IGs participating in EU ACs have interests in fisheries management in a broad sense. However, each IG is unique, and yet the following two aspects have caught our attention when we looked at **IGs that defend interests** directly related to the **sustainable use of fisheries resources** (and thus leaving aside those that represent commercial interests or focus on working conditions).

SMALL NUMBER of entities with a LARGE PRESENCE

In both groups of blue IGs organised at the European level - that is, both business and conservationist - a few organisations predominate.

Among the **IGs, the most notable are** EUROPECHE, the *Association of National Organisations of Fishing Enterprises in the European Union*, which brings together 15 national organisations from eight Member States (plus one organisation from Iceland), representing approximately 45,000 vessels. And EAPO, the *European Association of Fisheries Producer Organisations*, which represents 28 producer organisations from nine EU Member States, and thus approximately 10,000 vessels. Also noteworthy is *AIPCE-CEP*, which represents the national associations of fish processors and traders in the EU.

The **conservationist IGs** organised at the European level in the two ACs that stand out for their publications, campaigning capacity and popularity among the civilian population are Oceana, Clientearth, Pew and the WWF EPO.

In order to improve transparency, **the meetings held between the European Commission and the IGs participating in the ACs** - MAC and/or LDAC - and registered in the EU Transparency Register are published. For 2022, the information provided is as follows:

	Total number of MEETINGS in 2022	TOPIC: Fisheries in the broad sense
BUSINESS IGs		

AIPCE-CEP	2	2
COPA-COGECA	14 (COGECA)	None
	14 (COPA)	None
EAPO	4	4
EUROCOMMERCE	8	None Fisheries
EUROPECHE	5	5
EUROTHON	0	None
FRUCOM	0	None
GLOBAL TUNA ALLIANCE	No data	No data
INTERNATIONAL POLE AND LINE FOUNDATION	No data	No data
CONSERVATIONIST IGs		
CLIENTEARTH	19	7 (environment, oceans and fisheries)
EJF	4	1 international policies and IUU fisheries; 2 on forced labour
ETF	3	None
EUROCOOP	2	None
OCEANA	8	8
PEW	6	6 (environment, oceans and fisheries)
WWF EPO	13	4 (on environment, oceans and fisheries)

Source: Prepared by the authors based on information provided in the Transparency Register

TRANSPARENCY in FUNDING

As described above, publicly available information on IGs was used throughout the analysis, including information on the background of their creation, membership and funding. In the EU context, the Transparency Register contributes significantly to understanding the amount of funding available to entities. Furthermore, all organisations must submit an annual financial report signed by an accountant to remain on the Register. However, there are **three drawbacks** for both groups of IGs.

First, there is a category related to the funds available to the organisation, which is called "*Estimated annual costs attributable to activities covered by the Register.*" The effort to influence European policy goes far beyond meeting with Commission staff or contributing to public consultations - and these activities (such as campaigns or publishing studies) are not covered by that category.

Second, in many cases, the figures only indicate ranges (e.g., "€100,000 to €199,999"), so spending can vary widely. In other cases, the organisation provides the total budget, but it is also unclear whether this represents the entity's total budget for all its activities (beyond fisheries).

Third, all the IGs do not indicate **how they are funded** - whether they are funded through membership fees, corporate contributions or donations from citizens or large international foundations. **This deficiency is the most worrying for democratic quality** because the representation of interests is not only inferred from the work programme or membership, but often from who is funding it ("follow the money"). The European public policy is too important to allow "hidden agendas".

That said, it is worth mentioning that the entities participating in the European Social Dialogue Committee-namely, ETF, Europêche and Cogeca - are subject to the scrutiny of the European executive agency EUROFOUND.

The **business IGs** publish, in accordance with the rules of the Transparency Register, the expenditure ranges they use in order to carry out the activities described in the Register. However, the data are not disaggregated and specific, and their funding is unknown even by visiting their websites. Despite this drawback, the **sources of their funding are evident** because they are contributions from their national associations and/ or companies. And, closely related to this, it is also **clear who and what interests they represent**.

On the other hand, for **conservationist IGs** the situation is more complex. In our opinion, the degree of transparency **depends considerably on their legal personality** and the relative obligations they must fulfil. For example, US Section 501(c) organisations are **very transparent**, and their tax returns are accessible, providing information on their income, expenses and assets, as well as the recipients of their funds. However, for many organisations analysed in this document, the annual reports and accounts provide information which is not disaggregated; thus, it is true that it is usually possible to determine how much money was received from donors, but not who the latter are specifically. However, for many organisations analysed in this document, the annual reports and accounts provide **information which is not disaggregated**; thus, it is true that it is usually possible to determine how much money was received from **donors, but not who the latter are** specifically. Furthermore, although it is usually possible to identify the collaborators or even the donors, (again) in many cases it is not known exactly what

this collaboration entails. This unclear situation is further complicated when organisations receive funds from so-called "*donor-advised funds*" (explained below) because in this construct, the origin of the donations is not public - unless the donor wishes to make it public.

4.1. Some characteristics of blue BUSINESS IGs

- **A SMALL NUMBER OF ENTITIES PRESENT.**

As mentioned above, two IGs have a dominant presence within the ACs: EUROPÊCHE and EAPO. This presence is perhaps not surprising because these are the business IGs in the ACs whose mission is primarily to ensure sustainable fisheries in a broad sense, while other IGs, such as *Frucom* or *Copa-Cogeca*, represent more sectors not directly related to fisheries or marine conservation.

- **SOURCES OF FUNDING.**

In the previous sections, it was already noted that the sources of funding depend on the legal personality of the organisations due to their obligations regarding how to disclose their income. Undoubtedly, the EU Transparency Register has greatly contributed to this, because it provides data, at the very least, on the range of financial resources available to IGs.

Business IGs are composed of national organisations or, in some cases, companies. This apparent composition implies that these organisations rely on the financial support of their members and have no complex sources of income. However, their annual reports and accounts were not accessible, so their exact budgets could not be ascertained.

- **RELATIONSHIP BETWEEN THEM.**

Generally speaking, there are no close ties between business IGs at the European level, although it is true that some members are part of several IGs.

In the area of fisheries, EUROPÊCHE stands out again, having representation on international committees and organisations such as OSPAR, ILO, FAO/COFI, the UN General Assembly, CITES, CBD and ICFA¹⁹.

¹⁹ See Europêche's EU Transparency Register https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=2312395253-25 (12.11.2024)

• CREATION OF ALLIANCES AND NETWORKS.

One of the most important international coalitions is the ***International Coalition of Fisheries Associations (ICFA)***, which was established in 1988 and whose members are national associations from countries that harvest more than 85% of the world's fish²⁰. Its main mission is to promote the sustainable use of living marine resources²¹ for food security and prosperity.

It is registered in the United States as a *non-profit* organization, in accordance with the American regulation, under Section 501 (c) (6) of the IRC, as a business league or board of trade²².

IFCA is recognised as a consultative entity by the United Nations Economic and Social Council and is listed as such on the list of non-governmental organisations compiled for that purpose as of December 31, 2022²³.

4.2. Some characteristics of blue CONSERVATIONIST IGs

• A SMALL NUMBER OF ENTITIES PRESENT.

The structure of conservationist IGs organised at the European level that are part of MAC and LDAC is more complex. It is worth mentioning that those present in ACs have an **international dimension**, because they are created by or have other international foundations as members, participate with others in global alliances, and have financial ties to other international entities. Within the EU, it is worth noting the presence of only a few IGs, but something similar is observed at the international level. However, there is a huge number of non-profit organisations whose tasks are to conserve and/or restore nature on land, in the air, in water and in the seas and oceans. However, **we observe a dominant presence of a small number of entities** at the international level - and they are collaborating with European conservationist IGs - that have very significant financial funding. The Executive Director of *Oceans 5* acknowledged in a speech before the United Nations in 2022 that it is a small circle:

²⁰ See <https://aboutseafood.com/international-coalition-of-fisheries-associations-3/> (1.8.2023)

²¹ <https://fishcoalition.org/> (22.04.2024)

²² See "Form 990" at https://projects.propublica.org/nonprofits/display_990/263116976/04_2021_prefixes_26-26%2F263116976_201912_990EO_2021042117981063 (3.8.2023); See information on Section 501(c)(6) of the Internal Revenue Service at [https://www.irs.gov/charities-non-profits/other-non-profits/business-leagues#:~:text=Section%20501\(c\)\(6,of%20any%20private%20shareholder%20or](https://www.irs.gov/charities-non-profits/other-non-profits/business-leagues#:~:text=Section%20501(c)(6,of%20any%20private%20shareholder%20or) (4.8.2023)

²³ See list from ECOSOC <https://documents.un.org/doc/undoc/gen/n23/320/16/pdf/n2332016.pdf> (3.12.2024)

“A relatively small number of institutions are responsible for the majority of ocean giving. Groups like the David and Lucile Packard Foundation, Oak Foundation, Walton Foundation, Gordon and Betty Moore Foundation, Marisla Foundation and Bloomberg Philanthropies are dominant institutions. New entrants include groups like Oceankind and the Bezos Earth Fund.”²⁴

● SOURCES OF FUNDING.

Some of the IGs included in this document were founded by - or receive considerable support from - renowned philanthropic foundations, the vast majority being Anglo-Saxon entities whose assets come from oil, raw materials or technological inventions. These entities belong, in our opinion, to a **first generation** of philanthropic works, because there are powerful organisations that were created with part of the assets of famous magnates of yesteryear, such as the *Rockefeller Brothers Fund*, which is funded by the inheritance of the famous John D. Rockefeller Jr., who made a fortune with *Standard Oil*. The same applies to the *Marisla Foundation*, created by the heir to the estate of magnate J. Paul Getty of the *Getty Oil Company*. In the same category, we should mention the *Pew Charitable Trust*, which was created by Jonathan N. Pew and his heirs, who made a fortune with *Sun Oil Company*, which later became *Sunoco*.

There is, let's say, a **second generation** of philanthropists who made their fortunes in the second half of the 20th century. One such example is **Oak Foundation** founder Alan Parker, who was a partner in DTS Group (*Duty Free Shopping*), a luxury travel retailer now owned by LVMH *Moët Hennessy Louis Vuitton*. Parker created the organisation with interests from this business. Another example is the *Wyss Campaign for Nature*, an initiative created by *The Wyss Foundation*²⁵, whose main founder made a fortune with the company *Synthes USA*. The campaign has an endowment of \$1,500 million, with the goal of protecting 30% of the planet by 2030.

²⁴ Remarks of J. Charles Fox, Executive Director, Oceans 5 July 1, 2022 United Nations Ocean Conference, Interactive Dialogue #8 Interlinkages Between SDG 14 and Other Goals, https://sdgs.un.org/sites/default/files/2022-07/Oceans_5%28E%29_o.pdf (fecha de consulta 28.2.2023)

²⁵ See the information on the following website <https://www.wysscampaign.org/> (consulted on 28.2.2023) ; Hansjörg Wyss, multibillionario, multibillionaire, former chairman of the medical device company Synthes USA (see information on the following website <https://www.forbes.com/profile/hansjoerg-wyss/> (consulted on 28.2.2023))

Finally, there is a **third generation** that has emerged in recent years: entities - not always charities - created with funds from entrepreneurs in the "new technology" field. An example is the **Bezos Earth Fund**, created in 2020 by businessman Jeff Bezos, owner of *Amazon*, with a commitment of USD 10,000 million to address climate and nature issues, and with the aim of contributing to meeting the Sustainable Development Goals (SDGs) by 2030. As of February 2023, more than 100 grants had already been awarded with a total amount of USD 1,630 million²⁶. In the line of programmes to conserve and restore nature, USD 2,000 million were budgeted until 2030 for projects to conserve and restore nature²⁷. Among others, one of the lines of this organisation is to protect 30% of the entire planet²⁸. Another example that falls into this category is **Oceankind**, which appears on the world map of organisations as a well-connected donor, but apparently it is a company financed by the wife of the co-founder of *Google* (see the specific file in this document).

● RELATIONSHIPS BETWEEN THEM □ MULTIPLIER EFFECT

There are numerous connections of varying nature between the entities included in this report, both because of reciprocal "cooperation" relationships and others that could be defined as a rather unidirectional relationship, as grants are provided to each other. It is worth mentioning that some have created independent entities, such as **Oceana International**, which was founded by five foundations - **Marisla, Oak, Sandler, Pew and Rockefeller Brothers** - and which in turn supports **Oceana Europa**. Furthermore, it is observed that some founding entities of a conservationist IG provide grants to others and thus boost their contributions by channeling their grants through different channels, such as:

- ***Oceana Europa** has received funding from **Adessium**, which is also a founding entity of **Oceans 5**, and according to available data, has also contributed to **Oceana International** - which in turn contributes to **Oceana Europa**.*
- **WWF EPO** has received funding from **Oceans 5**, which also collaborates with **EJF**.

²⁶ See information on the following website <https://www.bezosearthfund.org/our-programs> (consulted on 28.2.2023)

²⁷ See the website <https://www.bezosearthfund.org/our-programs/conserving-restoring-nature> (consulted on 28.2.2023)

²⁸ See the website <https://www.bezosearthfund.org/ideas/protecting-30-of-the-planet-by-2030> (consulted on 28.2.2023)

• CREATION OF ALLIANCES AND NETWORKS

An interesting and intriguing feature is the fact that very powerful alliances have been created among conservationist IGs, both financially and in terms of advocacy.

There are numerous alliances or networks in which countless organisations participate, including the most prominent ones. Some of them are well-known in the fishing world, such as **On the Hook**, the **Deep Sea Conservation Coalition**, **Seas at Risk**, or species-specific alliances such as the **NGO Tuna Forum**.

But apart from the networks mentioned above, it is worth paying attention to the **more recently created alliances** that often include achieving the **"30 x 30" goal**. This is because we observe a union of older blue-chip conservationist IGs with newer ones, and these new alliances seem to have enormous financial resources. Without being exhaustive, we mention an example below:

"Protecting Our Planet Challenge"²⁹

- Background: "Largest-ever private funding commitment to biodiversity conservation"
- Objective: Biodiversity conservation, achieving "30 x 30" for land, water and marine ecosystems by 2030.
- Members: 11
 - Arcadia [founder of Oceans 5]*
 - Bezos Earth Fund*
 - Bloomberg Philanthropies*
 - Bobolink Foundation*
 - Gordon and Betty Moore Foundation [founder of Oceans 5]*
 - International Conservation Fund of Canada*
 - Re:wild*
 - Nia Tero*
 - Rainforest Trust*
 - Rob and Melani Walton Foundation*
 - Wyss Foundation*

²⁹

See the website <https://www.protectingourplanetchallenge.org/> (consulted on 28.2.2023)

- Budget: USD 5,000 million. In June 2022, they announced that they would invest at least USD 1,000 million for the creation, expansion and management of MPAs, and coastal and marine areas that are locally and/or indigenously managed.³⁰
- How: Support projects worldwide and increase global and national ambition; cooperation among all stakeholders; special mention should be made of strengthening capacity to manage and monitor the effectiveness of protected areas.

- **LEGAL PERSONALITY: THEY ARE USUALLY CHARITABLE ORGANISATIONS.**

Most of the entities included in the study are **charitable, non-profit organisations**. Depending on the country of incorporation or registration, they must meet certain requirements. The legal personality of entities is relevant in several ways and appears to affect two important issues - always depending on the regulations established by the country in which they were founded: **tax obligations and transparency requirements**.

First, entities established as charities and/or non-profit organisations may **be exempt from taxes** if they meet the requirements set by national laws. Perhaps even more relevant is that in some countries, **contributions** to these organisations **are** also **tax-deductible for their donors**.

- This is the situation in the **US** for "Section 501(c)(3)" organisations, as mentioned above - that is, if the requirements set out in US law are met, this entity does not pay taxes and the contributions it receives are also tax-deductible. In the US³¹ there is also the concept of a "private foundation," which must meet stricter requirements, such as publishing a form (*Form 990-PF*) that allows the public to obtain information on income, expenses or assets. Private foundations also often qualify for tax exemption, but they differ from other foundations in that they usually have a single source of income, as is the case

³⁰ See Moore Foundation, "Philanthropic organizations commit \$1B USD to help protect 30 percent of the ocean by 2030", [https://www.moore.org/article-detail?newsUrlName=philanthropic-organizations-commit-\\$1b-usd-to-help-protect-30-percent-of-the-ocean-by-2030](https://www.moore.org/article-detail?newsUrlName=philanthropic-organizations-commit-$1b-usd-to-help-protect-30-percent-of-the-ocean-by-2030) (consulted on 28.2.2023)

³¹ See the information provided by the IRS on the following website <https://www.irs.gov/charities-non-profits/charitable-organizations/exemption-requirements-501c3-organizations> (consulted on 28.2.2023)

- with family foundations.³²
- In the **British** context, they are usually "charitable organisations" and enjoy tax deductions on certain types of income (including donations), and if they use the money for charitable purposes, they are recognised by *HM Revenue and Customs*.
 - The **Netherlands**³³ also grants tax benefits to foundations, but they must obtain ANBI (*Algemeen Nut Beogende Instelling*) or SBBI (*Sociale Belang Behartende Instelling*) status from the Dutch public administration. One of the requirements for an ANBI is that 90% of the effort must be focused on public benefit. A legal or natural person who donates to an ANBI can deduct it from corporate or income tax.³⁴

Second, but closely related to the previous point, is the issue of **transparency**. Although it is preferable for charities to voluntarily disclose their sources of income and expenses - not only related to programmes but also transfers to other organisations - this is not the reality, as observed in this document. **Legal personality influences** the requirements that entities must meet. It's no surprise that the large, well-known American "private" foundations that are required to publish Form 990-PF provide information on income, expenses and assets. In this context, it's worth noting that there are also entities that are **companies**, such as **Oceankind** or the main organisation, the **Oak Foundation**, which is a company registered in Jersey (for more information on its complex structure, see its file in this report). In addition, there are donor-advised funds, which are a separate instrument, as can be seen in the following paragraph.

• **DONOR-ADVISED FUNDS.**

We want to emphasize a **particularity in the way grants are awarded**. There are so-called "donor-advised funds" (DAFs), which are, in very simple terms, an account of a charitable organisation that allows a foundation to make a donation to this account at any

³² See the information provided on the IRS website, <https://www.irs.gov/charities-non-profits/exempt-organization-types> (consulted on 28.2.2023)

³³ See the information on the following website <https://business.gov.nl/starting-your-business/choosing-a-business-structure/foundation/> (consulted on 28.2.2023)

³⁴ See the information on the website of the Public Administration of the Netherlands https://www.belastingdienst.nl/wps/wcm/connect/bldcontenten/belastingdienst/business/business-public-benefit-organisations/public_benefit_organisations/tax_advantages_pbo/ (consulted on 28.2.2023)

time, obtain an immediate tax deduction and recommend to the charity that manages this account who to donate the money to.³⁵ Or in the words of the IRS³⁶:

“Generally, a donor advised fund is a separately identified fund or account that is maintained and operated by a section 501(c)(3) organisation, which is called a sponsoring organisation. Each account is composed of contributions made by individual donors. Once the donor makes the contribution, the organisation has legal control over it. However, the donor, or the donor's representative, retains advisory privileges with respect to the distribution of funds and the investment of assets in the account.”

One of the **criticisms**³⁷ DAFs have received is, first, that **the source of donations is dissociated from their purpose**, meaning the account holder can remain anonymous; and second, that they fail to declare that they made this donation to a specific organisation. Thus, an organisation that manages DAFs may donate a large amount to a specific organisation because it raises the funds earmarked for that cause from different donors, but it is not known exactly which original donors that donation came from.

As an example, we can mention the **Tides Foundation**, which has been embroiled in several controversies³⁸ and was even accused of "dark money" for leaving donors anonymous³⁹. According to an article in *Bloomberg Law*, the Black Lives Matter Global Network Foundation Inc. sued the Tides Foundation in 2024 in a court from California, “(...)saying the fund is withholding and has “egregiously mismanaged” more than \$33 million in donations earmarked for Black Lives Matter”⁴⁰.

³⁵ See the information provided by the National Philanthropic Trust, *What is a Donor-Advised Fund (DAF)?*, acceso a la página web <https://www.nptrust.org/what-is-a-donor-advised-fund/> (consulted on 28.2.2023)

³⁶ See the website <https://www.irs.gov/charities-non-profits/charitable-organizations/donor-advised-funds> (consulted on 28.2.2023)

³⁷ See various posts on the website <https://www.insidephilanthropy.com/>; o DEBOSKEY, B. (2020), “On Philanthropy: Lack of accountability and transparency put philanthropy at an inflection point”, The Denver Post, July 12, 2020 <https://www.denverpost.com/2020/07/12/on-philanthropy-lack-of-accountability-and-transparency-put-philanthropy-at-an-inflection-point/>

³⁸ See the entry on Tides Foundation in “InfluenceWatch”: <https://www.influencewatch.org/non-profit/tides-foundation/> (consulted on 16.12.2024)

³⁹ LUDWIG, H. (2022), “Unearthing the Tides Nexus: ‘Dark Money’ Pioneer”, <https://capitalresearch.org/article/unearthing-the-tides-nexus-part-1/> (consulted on 16.12.2024)

⁴⁰ SPOTO, M. (2024), “BLM Nonprofit Says Tides Foundation Mismanaged \$33 Million (1,) <https://news.bloomberglaw.com/litigation/blm-nonprofit-says-tides-foundation-mismanaged-33-million> (consulted on 16.12.2024)

What the Tides Foundation also supposedly offers is the creation of a new entity or alliance when no organisation exists for the purpose a donor seeks.⁴¹ This claim has not been verified, and the truth of the previous statement by the author of "Activist Facts" is not discussed. However, what does seem to be a topic of interest is **transparency - or the lack thereof - in relation to DAFs**.⁴²

⁴¹ “If a donor wishes to give money to a particular cause but finds that there is no organization in existence dedicated specifically to that issue, the Tides Foundation will, for a fee, create a group to meet that perceived need.” (See the information provided on the following website <https://www.discoverthenetworks.org/organizations/tides-foundation-and-tides-center/>, fecha de consulta 28.2.2023)

⁴² See for example LEVINE, Martin (2018), “Chan Zuckerberg’s LLC and DAF Philanthropy: Another Giant Step in the Wrong Direction”, *NonProfit Quarterly Magazine*, September 12, 2018, en la página web <https://nonprofitquarterly.org/chan-zuckerbergs-llc-and-daf-philanthropy-another-giant-step-in-the-wrong-direction/> (consulted on 28.2.2023)

PART B - Business IGs in the Fishing Sector

NOTICE:

- This report is *intended to be illustrative and is based on the collection of information to the best of our knowledge*.

- *n/a*: This abbreviation indicates that no information was found (which does not mean that it does not exist).

Members of EU Advisory Councils (MAC & LDAC)

AIPCE-CEP

A SUMMARY OF THE ENTITY

I. Data on its creation⁴³

Year	1959	
Country of registration	Belgium De facto association	According to the 2019 Belgian law on companies and associations, art. 1:6 § 1 “Code des sociétés et des associations”, it is defined as follows: “A de facto association is an association without legal personality that is governed by the agreement of the parties.” ⁴⁴
Founder	AIPCE (EU Fish Processors and	

⁴³ See the AIPCE-CEP website: <https://www.aipce-cep.org/> (27/07/2023)

⁴⁴ Original definition in French, “[Art. 1:6](#). § 1er. L’association de fait est une association sans personnalité juridique régie par la convention des parties.”

	Traders Association) and CEP (European Federation of National Organisations of Importers and Exporters of Fish)	
Background of its creation	22 national associations representing the fish processing industry in the EU, focused on trade, food legislation/ labeling and sustainability.	Its members are 15 national associations from 9 Member States and 2 third countries (United Kingdom, Norway). It represents over 80% of the total representation at the EU level. The production value of this industry amounts to €34 million.

II. Data on the association

PRESIDENT	Guus PASTOOR
SECRETARY GENERAL	Katarina SIPIC

MEMBERS	Danish Seafood Association Les PME et ETI Francaises de l'Alimentation (PACT'ALIM) Union du Maréyage Français (U.M.F.) Bundesverband der deutschen Fischindustrie und des Fischgrosshandels e.V. Associazione Nazionale Conservieri Ittici e delle Tonnare (A.N.C.I.T.) UnionFood Visfederatie Syndicat National du Commerce Extérieur des Produits Congelés et Surgelés (SNCE) Polskie Stowarzyszenie Przetwórców Ryb (PSPR) Associação da Indústria Alimentar pelo Frio (ALIF) ANFACO – CECOPESCA Asociación Española de Mayoristas, Importadores, Transformadores y Exportadores de Productos de la Pesca y Acuicultura (CONXEMAR) Fiskbranschens Riksförbund (FR) FDF – Food & Drink Federation – Seafood Group Sjømat Norge
Participation in alliances/networks	Member of: Market Advisory Council (MAC), Long Distance Advisory Council (LDAC), Aquaculture Advisory Council (AAC), Baltic Sea, South Advisory Council, North Sea Advisory Council (NSAC), Pelagic Advisory Council, North Western Waters y Mediterranean Advisory Council (MEDAC)

III. SPHERES OF ACTION

It operates in three working groups: Trade, Food Regulation and Labeling, and Sustainability.

All groups seek to contribute and stay up-to-date on applicable regulations and coordinate with EU institutions and bodies and Advisory Councils.

B ECONOMIC & FINANCIAL SITUATION⁴⁵

Estimated annual costs attributable to activities covered by the Register	200,000 to 299,999 ⁴⁶
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⁴⁵ See the EU Transparency Register website: https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=586393391619-72 (12.11.2024)

⁴⁶ See the EU Transparency Register website: https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_en?id=586393391619-72 (11/02/2025)

Operating expenses	n/a
Equity	n/a
Public funds	n/a
Private funds received	n/a

C SPECIAL FEATURES of the Entity

It collaborates with public and private entities in the fishing sector to increase its impact as a cooperative.

It has only one full-time employee.

It represents 3,900 companies.

COPA-COGECA

A SUMMARY OF THE ENTITY

COPA-COGECA does not exist as an independent organisation, but is made up of two de facto associations representing farmers and agricultural cooperatives at the European level. They do share the secretariat.

I. Data on its creation⁴⁷

Year	1962	Year the secretariats of Copa and Cogeca merged ⁴⁸
Country of registration	Belgium Both organisations are, individually, de facto associations	According to the 2019 Belgian law on companies and associations, art. 1:6 § 1 “Code des sociétés et des associations,” it is defined as follows “A de facto association is an association without legal personality that is governed by an agreement between the parties.” ⁴⁹
Founder	COPA & COGECA	
Background of its creation	It is an association of 2 organisations: COPA (Comité de Organizaciones Profesionales	Founded in: 1958

⁴⁷ See the Copa-Cogeca website: <https://copa-cogeca.eu/> (27/07/2023)

⁴⁸ See <https://copa-cogeca.eu/about-cogeca> (27/07/2023)

⁴⁹ Original definition in French, “[Art. 1:6](#). § 1er. L’association de fait est une association sans personnalité juridique régie par la convention des parties.”

	Agrícolas), <i>European Farmers</i>	
	COGECA (Confederación General de Cooperativas Agrícolas), <i>European agri-cooperatives</i>	Founded in: 1959 It represents the general and specific interests of <u>European</u> agri-food, forestry and <u>fisheries cooperatives</u>

II. Data on the association

PRESIDENTS	COPA: Christiane LAMBERT COGECA: Ramón ARMENGOL	
MEMBERS	COPA: 60 EU members COGECA: 35 members	Members are national organisations in both cases
Associate members	COPA: 36 associate members from Iceland, Norway, Switzerland and Turkey COGECA: 36	
Participation in alliances/networks		

III. SPHERES OF ACTION

The roles of both COPA and COCEGA are to:

- For COPA, be the voice of European farmers and promote their interests.
- For COCEGA, represent the general and specific interests of agricultural, forestry, **fisheries** and agri-food **cooperatives**
- Influence decisions on agriculture and cooperatives by lobbying in European institutions

- Promote the multifunctional role of farmers in society
- Provide a platform for members to debate and facilitate communication and coordination

B ECONOMIC & FINANCIAL SITUATION

Operating budget for activities related to EU⁵⁰	COPA: €890,000 <i>In line with similar EU based organisations, the estimate of the annual costs related to activities covered by the register is for European farmers (Copa) in the range of €890,000. This includes the activities of 18 policy staff based in Brussels.</i> COGECA: €760,000⁵¹ <i>In line with similar EU based organisations, the estimate of the annual costs related to activities covered by the register is for European agri-cooperatives (Cogeca) in the range of €760,000. This includes the activities of 18 policy staff based in Brussels.</i>
Operating expenses	n/a
Net assests	n/a
Public funds	n/a
Private funds received	n/a

⁵⁰ See <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=40306802522-39> (2/08/2023)

⁵¹ See <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=09586631237-74> (2/08/2023)

C SPECIAL FEATURES of the Entity

They understand the need for strong agriculture and forestry in Europe.
It is heavily focused on the agri-food sector, concentrating its efforts on producer well-being and sustainable resource management.

EAPO

A SUMMARY OF THE ENTITY

I. Data on its creation⁵²

Year	1980	
Country of registration	Belgium, Association	
Founder	-	
Background of its creation	It aims to help members achieve the objectives of the CFP and the WTO, provide advice on Production and Marketing Plans, improve relations between Producer Organisations and European institutions, and influence policies affecting fisheries	It represents 28 producer organisations (POs) from 9 EU Member States

II. Data on the association

PRESIDENT	Esben SVERDRUP JENSEN
SECRETARY GENERAL	Emiel BROUCKAERT
MEMBERS	Swedish Pelagic Federation Sveriges Fiskares PO Puerto de Celeiro S.A. OPP - 77 OPPF-4 Pomorska Organizacja producentow - Arka SP. Z.O.O. Organizacja Producentów Ryb BaÅ,tyk Sp. z o.o.

⁵²

See the EAPO website: <https://www.eapo.com/> (27/07/2023)

	North Atlantic PO Redersvereniging PO Urk Nederlandse Visserbond Killybegs Fishermens' Association Ltd. Irish South & West Fish PO Ltd. Irish Fish PO Seefrostvertrieb GmbH Erzeugergemeinschaft der Nord- und Ostseefischer GmbH Erzeugergemeinschaft der Deutschen Krabbenfischer GmbH Pêcheurs d'Aquitaine OPBN Les Pêcheurs de Bretagne FROM SUD OUEST FROM NORD FEDOPA COBRENORD ANOP Danmarks Fiskeriforening PO Danmarks Pelagiske PO Rederscentrale
Participation in alliances/networks	Member of: Market Advisory Council (MAC) y Pelagic freezer trawler Association (PFA)

III. SPHERES OF ACTION

Generally speaking, its mission is to ensure that Fish Producer Organisations operate in compliance with the CFP and the WTO.

B ECONOMIC & FINANCIAL SITUATION⁵³

Estimated annual costs attributable to activities covered by the Register:	€100,000-199,999
Operating expenses	n/a
Equity	n/a
Public funds	n/a

⁵³ See the EU Transparency Register website: https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=46491656228-65 (12.11.2024)

Private funds received	n/a

C SPECIAL FEATURES of the Entity

Currently it represents 30 public organisations from 10 member states with approximately 3,700 vessels.

EUROCOMMERCE

A SUMMARY OF THE ENTITY

I. Data on its creation⁵⁴

Year	1993
Country of registration	Belgium, A.I.S.B.L. (<i>association internationale sans but lucratif</i>)
Founders	CECD (the European Retail Confederation), GEDIS (Groupement Européen des Distributeurs Intégrés or European group of integrated distributors) Fewita (Federation of Wholesale and International Trade association)
Background of its creation	EuroCommerce is a merger of the 3 founding organisations.

II. Data on the association

Managing Director	Christel DELBERGHE	
President	Juan Manuel MORALES	IFA Group
MEMBERS⁵⁵		

⁵⁴ See the website <https://www.eurocommerce.eu/our-organisation/> (11.11.2024)

⁵⁵ See <https://www.eurocommerce.eu/members/> (2.08.2023)

	National associations of 27 Member States: 35	
	Companies: 34	
	Associated federations: 15	
Participation in alliances/networks		

III. SPHERES OF ACTION

In general terms, its mission is to

- bring together national associations and companies representing the retail and wholesale trade under a single organisation
- promote European political and legislative outcomes in line with the interests of the sector
- inform members about Community policies and regulations, and facilitate the exchange of experience, knowledge and best practices among members

B ECONOMIC & FINANCIAL SITUATION⁵⁶

Operating budget for activities related to the EU Register	€1,750,000 - 1,999,999
Operating expenses	n/a
Equity	n/a
Public funds	n/a
Private funds received	n/a

⁵⁶ The balance sheet can be accessed at https://data.be/fr/doc/publication/nbb/BE_0449507896-2022-20087703 (26/07/2023)

C SPECIAL FEATURES of the Entity

In its own words, EuroCommerce is the leading European organisation representing the retail and wholesale sector. It encompasses national associations from 27 countries and 5 million companies, including many small businesses and multinationals such as Carrefour, IKEA, Metro and Tesco. According to the organisation, it is the main recognised partner representing retailers and wholesalers.

EUROPÊCHE

A SUMMARY OF THE ENTITY

I. Data on its creation⁵⁷

Year	1962	
Country of registration	Belgium De facto association	According to the 2019 Belgian Law on Companies and Associations, Article 1:6 § 1 of the "Code des sociétés et des associations," it is defined as follows "A de facto association is an association without legal personality that is governed by the agreement of the parties." ⁵⁸
Founder	n/a	
Background of its creation	Promote sustainable fishing practices aimed at ensuring food security	Be a means for formalising knowledge of the sector in legislative and policy decision-making. Inform its members about EU regulations and their implications.

II. Data on the association

PRESIDENT	Javier GARAT
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⁵⁷ See the Europepeche website: <https://europeche.chil.me/> (27/07/2023)

⁵⁸ Original definition in French, "Art. 1:6. § 1er. L'association de fait est une association sans personnalité juridique régie par la convention des parties."

MANAGING DIRECTOR	Daniel VOCES DE ONAINDI
MEMBERS	Union des Armateurs á la Pêche de France (UAPF) Deutscher Fischerei-Verband e.V Federazione Nazionale delle Imprese di Pesca (FEDERPESCA) Confederazione Cooperative Italiane (FEDERCOOPESCA) Legacoop Agroalimentare Dipartimento Pesca Associazione Generale Cooperative Italiane (AGCI AGRITAL) Alleanza de Cooperative Italiane Pesca Koperattivi Malta Pelagic Freezer-Trawler Association VisNed Dutch Fishermen's association and producers organisation – PO (Nederlandse Vissersbond) North Atlantic Producers Organization (PAOP) Confederación Española de Pesca (CEPESCA) Federación Nacional de Cofradías de Pescadores (FNCP) European Crabbing association Cobalboración: Fisheries Iceland
Participation in alliances/networks	Member of: Market Advisory Council (MAC) y Long Distance Advisory Council (LDAC) It regularly works with ETF on the Fisheries Social Dialogue Committee and collaborates with stakeholder organisations. It is has representatives in international committees and organisations such as OSPAR, ILO, FAO/COFI, UN General Assembly, CITES, CBD and ICFA.

III. SPHERES OF ACTION

Generally speaking, its mission is to promote sustainable and responsible fishing practices to ensure food supply and security while preserving the three aspects of sustainability: economic, social and environmental.

B ECONOMIC & FINANCIAL SITUATION⁵⁹

Estimated annual costs attributable to activities covered by the Register	€300,000-399,999	
Operating expenses	n/a	
Equity	n/a	
Public funds	EU subsidies: €26,153	
Private funds received	n/a	

C SPECIAL FEATURES of the Entity

It represents 45,000 vessels.

It is a **member of the sectoral social dialogue committee of maritime fisheries**, composed of a maximum of 66 representatives of the social partners, with an equal number of representatives of employers and workers.

⁵⁹ See the EU Transparency Register website: https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=2312395253-25 (12.11.2024)

EUROTHON

A SUMMARY OF THE ENTITY

El nombre completo es *Comité européen interprofessionnel du thon tropical*.

I. Data on its creation⁶⁰

Year	2004	
Country of registration	France Professional association (<i>Association professionnelle</i>)	Number RNA W751188662
Founder	n/a	
Background of its creation	n/a	

II. Data on the association⁶¹

PRESIDENT	Roberto ALONSO
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⁶⁰ According to the EU Transparency Register, its website is - <http://www.eurothon.eu>. However, at the time of data collection for this document, the website was no longer operational (12.11.2024).

⁶¹ See the information in the EU Transparency Register, <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=46018232355-49> (1.8.2023). It has not been updated yet.

MEMBERS	- ANFACO-CECOPESCA : www.anfaco.es - ANCIT : www.tonno360.it/ - ANICP : https://anicp.pt/ - FIAC : https://adepale.org/syndicat/fiac - ORTHONGEL : http://www.orthongel.fr/index.php - OPAGAC: www.opagac.org
Participation in alliances/networks	n/a

III. SPHERES OF ACTION

In general terms, its mission is to contribute to the growth and development of the European tropical tuna sector. Its interests include, among others:

- international and EU trade agreements, as well as Fisheries Association Agreements for sustainable fisheries
- promoting sustainable fisheries through RFMOs
- joint standards for the marketing of tuna products
- fleets like canning companies in the EU and (investments) in third countries

B ECONOMIC & FINANCIAL SITUATION⁶²

Estimated annual costs attributable to the activities covered by the Register:	< €10,000
Operating expenses	n/a
Equity	n/a
Public funds	n/a
Private funds received	n/a

⁶² See the EU Transparency Register website, <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=46018232355-49> (1.8.2023)

C SPECIAL FEATURES of the Entity

According to the information provided in the Transparency Register, this is a networking association and does not employ its own staff, rather, staff is provided by members.

FRUCOM

A SUMMARY OF THE ENTITY

Its full name is *European Federation of the Trade in Dried Fruit, Edible Nuts, Processed Fruit & Vegetables and Processed Fishery Products*

I. Data on its creation⁶³

Year	2008	It was created in 1960 in the Netherlands, but became a Belgian AISBL in 2008
Country of registration	Belgium, AISBL	
Founder	5 national organisations (Netherlands, Germany, Belgium, and France)	Remain members
Background of its creation	The founding organisations shared the need to join at the European level in order to defend their interests before the European Economic Community	

II. Data on the association

SECRETARY GENERAL	Anna BOULOVA	
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⁶³ See the Frucom website <https://frucom.eu> (1.08.2023)

MEMBERS	National trade associations can become members - and their companies become de facto members: Belgafood (B) Fruitimpreses (I) BFIDA (Suecia) The Nut & Dried Fruit Trade Association (UK) NZV (Países Bajos) SNFS (F) Almendrave (ESP) Waren-Verein der Hamburger Börse e.v. (Alemani)	
Associate members⁶⁴	Acqua Terra Aegean Exporters Association American Pistachio Growers Almond Board of Australia Almond Board of California California Walnut Chile Prune Association California Prune Board (Europe) Fuster Nuts HEPA Istanbul Hazelnut Exporters Union International Nut and Dried Fruit Council Ireco Black Sea Hazelnut Exporters Union La Pulpe SIPA (Seafood Importers & Processors Alliance) Wonderful Brands Olam Turkey Safe Food Alliance Raisins South Africa Cranberry Marketing Committee	The following can be associate members: - Individual companies from EU countries without a national trade association; - Associations of EU countries with interests related to import trade and associations or individual companies from non-EU countries.

⁶⁴ See information at <https://frucm.eu/downloads/members/Affiliate-members-list.pdf?327440053> (1.08.2023)

	Eurofins Analytik GmbH AGRARCO Bühler UK Ltd. American Peanut Council American Pecan Council Dried Fruits Australia	
Participation in alliances/networks	n/a	

III. SPHERES OF ACTION

In general terms, its mission is to represent and defend the interests of its sectors, facilitate trade of quality and safe products, and inform its members of legal requirements. It also aims to contribute to the visibility of the sectors and provide a network for its members.

B ECONOMIC & FINANCIAL SITUATION⁶⁵

Operating budget for activities related to EU	€200,000 – 299,000
Operating expenses	n/a
Equity	n/a
Public funds	n/a
Private funds received	n/a

C SPECIAL FEATURES of the Entity

The association was founded in 1960 and represents the interests of the fruit, nuts, fish and processed fruit and vegetable markets. On their website, they have a document outlining their role and certain food consumption statistics from the industries they represent.

⁶⁵ See information at: https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=40306802522-39 (03.12.2024)

GLOBAL TUNA ALLIANCE

It is a member of LDAC, but is not registered in the EU Transparency Register.

It was established in 2019 as a foundation under Dutch law.

Its **members are retailers**, including World Wise Foods.⁶⁶

Income and sources could not be determined. However, a grant from the Walton Family Foundation for three years is mentioned, but the amount is not stated. The wording could lead to the conclusion that it ensures its operation for three years, "(...) in 2021 we secured 3-year funding from the Walton Family Foundation. This funding allows the GTA to further build our foundation in these early years."⁶⁷

The budget from September 2019 to December 2020 was £290,650, while expenses were £146,857.⁶⁸

⁶⁶ See the website <https://www.globaltunaalliance.com/partners/> (consulted on 1.3.2023)

⁶⁷ *Global Tuna Alliance 2021 Annual Report*, February 2022, <https://www.globaltunaalliance.com/wp-content/uploads/2022/10/2021-Annual-Report.pdf> (consulted on 1.3.2023), p. 6

⁶⁸ *Global Tuna Alliance 2021 Annual Report*, February 2022 [...] op. cit, p. 13

INTERNATIONAL POLE AND LINE FOUNDATION (IPNLF)

A SUMMARY OF THE ENTITY

I. Data on its creation⁶⁹

Year	2012	
Country of registration	United Kingdom, registered in the <i>Charity Commission for England and Wales</i> , as a non-profit organisation (Charity Number 1145586)	Not recognised by HMRC for receiving gifts
Founders⁷⁰	Shiham ADAM (founding trustee, remains Director for Science and the Maldives) Andrew BASSFORD (co-founder, was trustee until 2021)⁷¹ John BURTON⁷² (co-founder - remains trustee)	Former Director at the Ministry of Fisheries and Aquaculture in the Maldives CEO of <i>Marine Change</i>⁷³ (financial services company, focusing on investments in seafood companies committed to sustainability) Founder of <i>World Wise Foods</i>

⁶⁹ See Charity Commission for England and Wales, International Pole and Line Foundation, <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5023726/charity-overview> (2.05.2023)

⁷⁰ IPNLF, People, <https://ipnlf.org/people/team/> (2.05.2023)

⁷¹ LinkedIn, Andrew Bassford, <https://www.linkedin.com/in/andrew-bassford-45714421/> (2.05.2023)

⁷² See the website <https://ipnlf.org/people/trustees/> (consulted on 2.05.2023)

⁷³ See the website <https://marinechange.com/> (consulted on 2.05.2023)

	Adnan ALI (co-initiator)	
Background of its creation	IPLF was created to represent the anglers of the Maldives - following a Greenpeace report (2009) that highlighted the poor state of the stocks. Hence their mission: one hook, one line, one fish at a time ⁷⁴ .	

II. Data on the entity

President⁷⁵	John BURTON	
Managing Director	Marti PURVES ⁷⁶	
Members⁷⁷	66 - companies (retailers, distributors, etc.), fishing associations	
Participation in alliances/networks	Founder of the Coalition for Transparent Tuna Fisheries, members⁷⁸: - Blue Marine Foundation - Shark Guardian - BLOOM - Sharkproject - Olive Ridely Project - Hong Kong Shark Foundation - Blue Planet Society - Prof. Yvonne Sadovy (SCRFA) - Ocean Recovery Alliance - Hong Kong Legislative Council, Hon. Elizabeth Quat - Carl Safina (The Safina Center)	

⁷⁴ See the website <https://ipnlf.org/about/> (2.05.2023)

⁷⁵ See the EU Transparency Register, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=655531147120-01 (12.11.2024)

⁷⁶ See the website <https://ipnlf.org/people/team/> (2.05.2023)

⁷⁷ See the website <https://ipnlf.org/our-members/> (2.05.2023)

⁷⁸ See the website <https://cttf.uk/> (sección *Members*) (2.05.2023)

	- Sylvia Earl (Mission Blue) - SeaLegacy - Fernando Reis (Sharks Educational Institute) - Antoinette Vermilye (Gallifrey Foundation) - Where's The Fish - Divers for Sharks - Ibracon - ekolibrium ☐ Undisclosed funding ☐ Unknown activities NGO TUNA FORUM
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III. SPHERES OF ACTION

Its objective is to promote the sustainable management of pole-and-line, handline and troll tuna fisheries (collectively known as "one-by-one"), while recognising the importance of safeguarding the livelihoods they support.⁷⁹

B ECONOMIC & FINANCIAL SITUATION

Estimated annual costs attributable to the activities covered by the Register⁸⁰	€50,000 - 99,999	
Total income (2021)⁸¹	£865,235	
	£ £ 564,252	Donations and grants
	£ £ 300,983	Membership fee

⁷⁹ European Union Transparency Register, International Line and Pole Foundation, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=655531147120-01 (12.11.2024)

⁸⁰ See EU Transparency Register https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=655531147120-01 (12.11.2024)

⁸¹ IPNLF, *International Pole and Line Foundation Annual Report and Financial Statements for the Year ended 31 December 2021*, https://register-of-charities.charitycommission.gov.uk/charity-search?p_p_id=uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet&p_p_lifecycle=2&p_p_state=maximized&p_p_mode=view&p_p_resource_id=%2Faccounts-resource&p_p_cacheability=cacheLevelPage&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_objectiveId=A12402377&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_mvcRenderCommandName=%2Faccounts-and-annual-returns&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_organisationNumber=5023726, pp. 9 – 10, p. 15 (2.05.2023)

Expenses (2021)	£1,167,887	
Total assets except current liabilities (2021)	£27,723	
Public funds	n/a	
Private funds	n/a	

C SPECIAL FEATURES of the Entity

It is an entity that represents the sector and works closely with conservationist IGs in the **Coalition for Transparent Tuna Fisheries**.

The sources of the donations could not be determined.

PART C - Conservationist IGs

Conservationist IGs - European Area of Influence

NOTICE:

- *This report is intended to be illustrative and is based on the collection of information to the best of our knowledge.*

- *n/a: This abbreviation indicates that no information was found (which does not mean that it does not exist).*

Members of EU Advisory Councils (MAC & LDAC)

CLIENTEARTH

A SUMMARY OF THE ENTITY

I. Data on its creation⁸²

Year	2007
Country of registration	Belgium, A.I.S.B.L. (Company No. 0714.925.038)
Founder ⁸³	James THORNTON
Background of its creation	Thornton was a Wall Street lawyer who fought, among other causes, to clean up contaminated water.

⁸² See the Client Earth website <https://www.clientearth.org> (01.08.2023)

⁸³ See <https://www.clientearth.org/about/who-we-are/history/> (01.08.2023)

II. Data on the association

CEO	Laura CLARKE
MEMBERS	n/a
Participation in alliances/networks	n/a

III. SPHERES OF ACTION

is an organisation that brings together activist lawyers working at the interface of law, science and politics. They aim to contribute to addressing environmental problems by developing legal strategies and tools, and also provide advice to NGOs.

In the area of fisheries⁸⁴, they are dedicated to reducing threats to the marine environment, such as overfishing and illegal fishing. They aim to promote transparency, improve the sustainability of seafood supply chains and ensure the enforcement of current legislation.

B ECONOMIC & FINANCIAL SITUATION

Total Budget	€41,516,286 ⁸⁵	
Operating expenses for activities related to the EU	n/a	
Equity	n/a	
Public funds (2021)	NORAD - Norway's International Climate and Forest Initiative (NICFI)	997,323

⁸⁴ See information at: <https://www.clientearth.org/what-we-do/priorities/fisheries-and-sustainable-seafood/> (01.08.2023)

⁸⁵ See https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=96645517357-19 (12.11.2024)

Private funds received (2021) ⁸⁶	Children's Investment Fund Foundation (CIFF)	4,310,072
	Grantham Foundation for the Protection of the Environment	3,092,740
	Bloomberg Philanthropies	1,424,427
	Sequoia Climate Foundation	1,227,750
	Postcode Earth Trust	1,000,000
	European Climate Foundation (ECF)	896,825
	FCDO FGMC via Pegasys Ltd	804,872
	Rockefeller Brothers Fund	570,320
	MacArthur Foundation	539,596
	Other donors	10,096,227
	- from Oceans 5	657,000 (for 3 years)

C SPECIAL FEATURES of the Entity

For activities related to the ocean, they received funding in 2020 from *Levine Family Foundation*, *Adessium Foundation*, *Walton Family Foundation* and *Oceans 5*, among others⁸⁷.

⁸⁶ ClientEarth, Annual Report and Financial Statements. For the year ended 31 December 2021, <https://www.clientearth.org/media/bubhmqgp/clientearth-annual-accounts-2021-final-signed.pdf>, p. 47 (01.08.2023)

⁸⁷ See information at <https://www.clientearth.org/media/gkraj42g/clientearth-2020-annual-report.pdf>, p. 62 (3.08.2023)

EJF – ENVIRONMENTAL JUSTICE FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation⁸⁸

Year	1999-2001
Country of registration	United Kingdom. Registered with the Charity Commission for England and Wales (no. 1088128). The legal entity is a trust. It is recognised by HMRC to receive donations.
Founders⁸⁹	Steve TRENT Juliette WILLIAMS
Background of its creation	-

II. Data on the entity

CEO⁹⁰	Steve TRENT	
Director	Juliette WILLIAMS	
Donors to EJF	there is no detailed information on the website	
Collaborators⁹¹	- Aegis CT - Arcadia Fund - Danish Institute for Human	

⁸⁸ See Charity Commission for England and Wales, Environmental Justice Foundation, <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/3973951/governance> (1.08.2023)

⁸⁹ See the EJF website, <https://ejfoundation.org/who-we-are> (1.08.2023)

⁹⁰ See the EJF website, <https://ejfoundation.org/who-we-are/the-ejf-team> (1.08.2023)

⁹¹ See the website <https://ejfoundation.org/who-we-are/funders-financials> (3.08.2023)

	Rights - Dropbox Foundation - EU International Partnerships - Levi Strauss Foundation - Generation Foundation - Gordon and Betty Moore Foundation - Humanity United - Norwegian Agency for Development Cooperation (Norad) - Norwegian Retailers' Environment Fund - Oak Foundation - Oceankind - Oceans 5 - Rufford Foundation - US State Department - Walton Family Foundation - Waterloo Foundation	
Participation in alliances/networks⁹²	EU IUU fishing Coalition (IUU Watch) Global Fisheries Transparency Coalition	Together with Oceana, Pew Charitable Trusts, TNC and WWF Together with, among others, Oceana, Citizens Institute of Environmental Studies (Korea), Global Fishing Watch, the Regional

⁹² European Union Transparency Register, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=817535514065-10 (12.11.2024)

	Partnership for Coastal and Marine Conservation (West Africa), Seafood Legacy (Japan), and the WWF Network
Deep Sea Conservation Coalition	
Bottom Trawling Coalition	
On the Hook	

II. SPHERES OF ACTION

“It works to achieve a world in which the natural world can support and be supported by the communities that depend on it for their fundamental human rights.” (translated from English)⁹³

They have 5 thematic spheres⁹⁴:

- Ocean
- Climate
- Fauna, flora and biodiversity
- Forests
- Cotton

B ECONOMIC & FINANCIAL SITUATION

Total income (31.12.2021)⁹⁵	£3,656,946	£3,633,986 come from “ <i>grants and donations</i> ”
Operating expenses (31.12.2021)	£2,867,150	£ 1,704,261 was spent on the “Oceans Campaign” ⁹⁶
Current equity (31.12.2021)	£4,869,868	

⁹³ See the website <https://ejfoundation.org/who-we-are> (28.04.2023)

⁹⁴ See the website <https://ejfoundation.org/what-we-do> (28.04.2023)

⁹⁵ EJFCT, *Trustees Report and Accounts for the Year Ended 31st December 2021*, p. 27, <https://ejfoundation.org/resources/downloads/Environmental-Justice-Foundation-Charitable-Trust-Accounts-31.12.21.pdf> (1.08.2023)

⁹⁶ EJFCT, *Trustees Report and Accounts for the Year Ended 31st December 2021*, [...] op. cit, p. 32, (1.08.2023)

Public funds	yes	“Current financial year” (consulted on 7.2.2023)
• Source	European Union ⁹⁷	
• Amount (year)	€747,626 (2023?)	
Private funds	Incomplete information	
• Entities (NGOs, companies, individuals)	☐ According to the EU Transparency Register, the following amounts came from the following entities in the closed financial year⁹⁸: - (€?)1,265,867 from “NPT” - (€?)427,380 from “Moore Foundation”	
Grants awarded to	Oceana Europa (according to information from Oceana Europa) from the “ <i>Environmental Justice Foundation (Walton FF)</i> ”	€83,887.61 (<i>information in part C below</i>)

⁹⁷ European Union Transparency Register, *Environmental Justice Foundation*, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=817535514065-10 (12.11.2024)

⁹⁸ European Union Transparency Register, *Environmental Justice Foundation*, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=817535514065-10 (12.11.2024)

	Oceana Europa (according to information from Oceana Europa) from the “ <i>Environmental Justice Foundation (O5-Y3)</i> ”	€ 81,103.61 (<i>information in part C below</i>)
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C SPECIAL FEATURES of the Entity

The donation to Oceana Europa appears in the Oceana Europa report as “*Environmental Justice Foundation (Walton FF)*”⁹⁹. In our opinion, this could be an EJF donation originating from the Walton Family Foundation as a "donor-restricted fund" (i.e., Walton FF gave money to EJF to be used for Oceana Europa or for the purposes it seeks to achieve).

The donation to Oceana Europa appears in the report as “*Environmental Justice Foundation (O5-Y3)*”¹⁰⁰. In our opinion, this could be an EJF donation originating from Oceans 5 as a "donor-restricted fund". Oceans 5 is a collaborative (an organised collective effort) managed by Rockefeller Philanthropy Advocates, which acts as the fiscal sponsor and neutral venue.¹⁰¹

⁹⁹ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, https://europe.oceana.org/wp-content/uploads/sites/26/2022/11/Fundacion-Oceana_2021-Annual-Accounts-Audit-report_low.pdf, p. 23 (consulted on 1.3.2023)

¹⁰⁰ Ibidem.

¹⁰¹ See the Rockefeller Philanthropy Advisors website, <https://www.rockpa.org/philanthropist/oceans-5/> (consulted on 1.3.2023)

ETF – European Transport Workers’ Federation

A SUMMARY OF THE ENTITY

I. Data on its creation¹⁰²

Year	1999	
Country of registration	Belgium De facto association	According to the 2019 Belgian Law on Companies and associations, art. 1:6 § 1 “Code des sociétés et des associations,” it is defined as follows “A de facto association is an association without legal personality that is governed by an agreement between the parties.” ¹⁰³
Founder	European transport unions ¹⁰⁴	
Background of its creation		

II. Data on the association

PRESIDENT	Frank MOREELS
Section Chair Fisheries	Juan Manuel TRUJILLO CASTILLO
MEMBERS	> 200 transport unions from 38 European countries

¹⁰² See the website <https://www.etf-europe.org/> (2.08.2023)

¹⁰³ Original definition in French, “[Art. 1:6](#). § 1er. L’association de fait est une association sans personnalité juridique régie par la convention des parties.”

¹⁰⁴ Journal of the International Transport Workers’ Federation 4/99, http://library.fes.de/itf/pdf/z2776/1999/z2776_1999_04.pdf (2.08.2023)

Participation in alliances/networks	ETF is affiliated with ITF (International Transport Workers' Federation), the European Trade Union Confederation, and is a member of Eurocadres.
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III. SPHERES OF ACTION

Generally speaking, its mission is to defend the interests of workers in the transport and fisheries sectors and represent them before European bodies. It is the European social partner in the seven social dialogue committees: maritime transport, civil aviation, fisheries, railways, road, ports and inland waterways.

In the area of fisheries, it focuses on improving working conditions on board fishing vessels. Faced with the challenge of generational change, improvements in working conditions and decent wages are crucial. Furthermore, it fights for specialised training and qualifications and for the mutual recognition of technical certifications.

B ECONOMIC & FINANCIAL SITUATION

Estimated annual costs attributable to the activities covered by the Register¹⁰⁵	€2,750,000 - 2,999,999
Operating expenses	n/a
Equity	n/a
Public funds (2021)¹⁰⁶	European Union: €3,911,770
Private funds received	n/a

C SPECIAL FEATURES of the Entity

¹⁰⁵ See the EU Transparency Register https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=92545571128-74 (12.11.2024)

¹⁰⁶ See the EU Transparency Register https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=92545571128-74 (12.11.2024)

The union was founded in 1999 as a confederation of trade unions from the EU, the EEA, Central and Eastern Europe. Specifically, it covers workers in the civil aviation, fishing, railway and transport sectors, among others.

EUROCOOP

A SUMMARY OF THE ENTITY

Its full name is *European Community of Consumer Cooperatives*.

I. Data on its creation¹⁰⁷

Year	1957	It was one of the first NGOs recognised by the Commission.
Country of registration	Belgium, AISBL	
Founder	n/a	
Background of its creation	n/a	

II. Data on the association¹⁰⁸

PRESIDENT	Mathias FIEDLER
SECRETARY GENERAL	Todor IVANOV
MEMBERS	It represents the national consumer cooperative organisations of 20 European countries: - 15 Member States - UK, Ukraine, Russia, Norway and Iceland

¹⁰⁷ See the EuroCOOP website <https://www.eurocoop.coop/about-us/Who-We-Are/> (11.11.2024)

¹⁰⁸ See the EuroCOOP website <https://www.eurocoop.coop/management/> (11.11.2024)

Participation in alliances/networks

[Consumer Co-operatives Worldwide](#) (CCW)

Member of *Cooperatives Europe* (representing the European region in the *International Cooperative Alliance*)

III. SPHERES OF ACTION

The general mission of EuroCOOP is to promote the economic and social objectives of European consumer cooperatives within European institutions.

On its website, it lists the following objectives:

- advocacy to promote consumer cooperatives in the EU and represent the interests and rights of consumers
- promote cooperation among members
- facilitate coordination among its members
- cooperate with Cooperatives Europe and the International Cooperative Alliance for the SDGs
- support members to promote young people, the leaders of the future

B ECONOMIC & FINANCIAL SITUATION

Annual costs attributable to activities covered by the Register (2021)	€400,000 - 499,999
Operating expenses	n/a
Equity	n/a
Public funds (2021) ¹⁰⁹	European Union: €73,661
Private funds received	n/a

¹⁰⁹ See the EU Transparency Register, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=3819438251-87 (12.11.2024)

C SPECIAL FEATURES of the Entity

EuroCoop provides secretarial support for the work of [Consumer Co-operatives Worldwide](#) (CCW).

OCEANA EUROPA “Fundación Oceana”

A SUMMARY OF THE ENTITY

I. Data on its creation

Year	2004 (Association under Spanish law) ¹¹⁰
Country of registration	Spain (Madrid)
Founding entities	(presumably Oceana International)
Background of its creation	Entity Associated with Oceana International

II. Data on the entity

Executive Director	Pascale MOEHRLE ¹¹¹
Receives contributions from... ¹¹²	- European Commission - Oceana Inc - National Postcode Loterij (Dutch Postcode) - Adessium Foundation - Oceana UK - Swedish Postcode Lottery - Environmental Justice Foundation (Walton FF) - Environmental Justice Foundation (O5-Y3) - March Asset Management

¹¹⁰ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, https://europe.oceana.org/wp-content/uploads/sites/26/2022/11/Fundacion-Oceana_2021-Annual-Accounts-Audit-report_low.pdf (3.08.2023), p. 4

¹¹¹ European Union Transparency Register, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=47937943241-80 (12.11.2024)

¹¹² Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, [...] op. cit., , p. 23

- The Nature Conservancy - Oceans 5
- Global Fishing Watch
- Levine Family Foundation
- Ocean Born Foundation
- Foundation for The Third Millenium
- Boston Consulting Group France

III. SPHERES OF ACTION

According to the information provided by the Oceana Foundation, its work in 2021 focused on the following¹¹³:

- Defend sustainable fisheries management in Europe and ensure that stocks recover and remain below maximum sustainable yield levels (MSY).
- Minimise the entry of single-use plastics into the sea
- Eliminate IUU fishing through transparency in both European and international waters
- Increase the effectiveness of the European MPA network and ensure that existing MPAs are sufficiently protected

These objectives are pursued through¹¹⁴:

- direct advocacy with politicians and legislators
- scientific expeditions and research
- social mobilisation and communication campaigns

B ECONOMIC & FINANCIAL SITUATION

Income from own activities (2021)	€3,017,211 ¹¹⁵ L of which €2.975 million is in grants, donations and legacies
Total expenses/ investments (2021)	€3,070,689 ¹¹⁶

¹¹³ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, [...] op. cit, , p. 5

¹¹⁴ Ibidem

¹¹⁵ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, [...] op. cit, p. 35

¹¹⁶ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, [...] op. cit, p. 35

Equity + current liabilities	€1,201,336 ¹¹⁷																			
Public funds	yes																			
• Source	European Commission																			
• Amount (year)	€1,365,707.40 (in 2020-2021) ¹¹⁸																			
Private funds received																				
• Entities (NGOs, companies, individuals)	14 entities, both foundations and companies ¹¹⁹																			
• Sources																				
• Amounts (year): the amount granted is for 1 or several years	<table><tr><td>Oceana Inc</td><td>1,243,179.66</td></tr><tr><td>National Postcode Loterij (Dutch Postcode)</td><td>1,000,000.00</td></tr><tr><td>Adessium Foundation</td><td>780,000.00</td></tr><tr><td>Oceana UK</td><td>270,845.21</td></tr><tr><td>Swedish Postcode Lottery</td><td>194,700.20</td></tr><tr><td>Environmental Justice Foundation (Walton FF)</td><td>83,887.61</td></tr><tr><td>Environmental Justice Foundation (O5-Y3)</td><td>81,103.61</td></tr><tr><td>March Asset Management</td><td>63,221,34</td></tr><tr><td>The Nature Conservancy – Oceans 5</td><td>36,513.14</td></tr></table>		Oceana Inc	1,243,179.66	National Postcode Loterij (Dutch Postcode)	1,000,000.00	Adessium Foundation	780,000.00	Oceana UK	270,845.21	Swedish Postcode Lottery	194,700.20	Environmental Justice Foundation (Walton FF)	83,887.61	Environmental Justice Foundation (O5-Y3)	81,103.61	March Asset Management	63,221,34	The Nature Conservancy – Oceans 5	36,513.14
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Environmental Justice Foundation (Walton FF)	83,887.61																			
Environmental Justice Foundation (O5-Y3)	81,103.61																			
March Asset Management	63,221,34																			
The Nature Conservancy – Oceans 5	36,513.14																			

¹¹⁷ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, [...] op. cit, , p. 2

¹¹⁸ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, [...] op. cit, , p. 23

¹¹⁹ Oceana Foundation, *Abbreviated Annual Accounts and Audit Report for the year ended December, 31st. 2021*, [...] op. cit, , p. 23

	Global Fishing Watch	34,100.00	
	Levine Family Foundation	28,734.98	
	Ocean Born Foundation	25,000.00	
	Foundation for The Third Millenium	140,980.05	
	Boston Consulting Group France	5,000.00	

C SPECIAL FEATURES of the Entity

It receives funds from OCEANA International.

The donation to Oceana Europa appears in the report as “*Environmental Justice Foundation (Walton FF)*”. In our opinion, this could be an EJJ donation originating from the *Walton Family Foundation* as a "donor-restricted fund" (i.e., Walton FF gave money to EJJ to be used for Oceana Europa or for the purposes it seeks to achieve).

The donation to Oceana Europa appears in the report as “*Environmental Justice Foundation (O5-Y3)*”. In our opinion, this could be an EJJ donation originating from *Oceans 5* as a "donor-restricted fund". *Oceans 5* is a collaborative (an organised collective effort) managed by Rockefeller Philanthropy Advisors, which acts as the fiscal sponsor and neutral venue.¹²⁰

¹²⁰

See <https://www.rockpa.org/philanthropist/oceans-5/> (consulted on 2.5.2023)

PEW CHARITABLE TRUSTS

A SUMMARY OF THE ENTITY

I. Data on its creation¹²¹

Year	2002 (entidad actual)
Country of registration	USA, Section 501(c)(3) charitable organisation
Founders	It is funded by 7 individual charitable funds of the family (established between 1948 and 1979) that donate solely to Pew Charitable Trusts
Background of its creation	It was created by the heirs of the founder of “Sun Oil Company” J.N. Pew. ¹²²

II. Data on the entity

President and CEO	Susan K. URAHN ¹²⁴	
Board of Directors¹²³	Christopher Jones, Chair Henry P. Becton, Jr. Robert H. Campbell Susan W. Catherwood Raynard Kington, M.D., Ph.D. J. Howard Pew II Joseph N. Pew V Mary Catharine Pew, M.D. Sandy Ford Pew Willa Seldon Susan K. Urahn	

¹²¹ See the Pew website <https://www.pewtrusts.org/en/about/history> (3.08.2023)

¹²² Ibidem

¹²³ See the Pew website <https://www.pewtrusts.org/en/about/leadership> (3.08.2023)

¹²⁴ Ibidem

Donors	Income comes - apparently - from <i>Pew</i> charitable funds	
Participation in alliances/networks	Blue Nature Alliance¹²⁵ Pew Bertarelli Ocean Legacy Deep Sea Conservation Coalition; High Seas Alliance; Antarctic Oceans Alliance; Antarctic and Southern Ocean Coalition; IUCN; European Foundations Association; EU IUU Coalition.¹²⁶	with Conservation International, The Global Environment Facility, Minderoo Foundation, and the Rob and Melani Walton Foundation

III. SPHERES OF ACTION

- ☐ Communities (arts and culture, higher education, Philadelphia)
- ☐ **Conservation** (Land, Ocean --- International Fisheries, Pew Bertarelli Ocean Legacy)

Projects¹²⁷:

[Chilean Patagonia](#)
[Conserving Life in Canada's Oceans](#)
[Conserving Marine Life in the United States](#)
[Flood-Prepared Communities](#)
[International Boreal Conservation Campaign](#)
[International Fisheries](#)

¹²⁵ [Blue Nature Alliance](#) is a global partnership founded and led by Conservation International, The Pew Charitable Trusts, The Global Environment Facility, Minderoo Foundation, and the Rob and Melani Walton Foundation that seeks to safeguard global ocean biodiversity, build resilience to climate change, promote human well-being, and enhance ecosystem connectivity and function. (See the website <https://www.pewtrusts.org/en/about/philanthropic-partnerships>, 108.2023)

¹²⁶ European Commission, Transparency Register, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=46834536998-79 (12.11.2024)

¹²⁷ See the website, <https://www.pewtrusts.org/en/projects?status=active&sortBy=relevance&sortOrder=asc&page=1> (consulted on 2.5.2023)

[Marine Fellows](#)
[Pew Bertarelli Ocean Legacy](#)
[Preventing Ocean Plastics](#)
[Protecting Australia's Nature](#)
[Protecting Coastal Wetlands and Coral Reefs](#)
[Protecting Life in the Arctic - U.S.](#)
[U.S. Public Lands and Rivers Conservation](#)

- ☐ Finance and Economy (economic mobility, family finances, fiscal and economic policy, retirement)
- ☐ Government (infrastructure, US politics, US state politics)
- ☐ Health (antibiotics, biomedical research, food and pharmaceutical safety, healthcare)
- ☐ Trends (global trends, Hispanics, internet and technology, media and news, religion, social and demographic trends, US politics)

B ECONOMIC & FINANCIAL SITUATION¹²⁸

Total income (6.2022)	USD 201.9 million
Operating expenses (6.2022)	USD 378.573 million
Equity (6.2022)	USD 6,917 million
Public funds	No (for financial year 2022) ¹²⁹
Private funds	from own funds

¹²⁸ The Pew Charitable Trusts, *Consolidated Financial Statements and Report of Independent Certified Public Accountants*, https://www.pewtrusts.org/-/media/assets/2022/11/financialstatements_2022.pdf (1.08.2023), p. 6

¹²⁹ European Commission, Transparency Register, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=46834536998-79 (12.11.2024)

C SPECIAL FEATURES of the Entity

Founding entity of OCEANA INTERNATIONAL.

It is part of the following networks/ alliances (among others): Blue Nature Alliance, Deep Sea Conservation Coalition, High Seas Alliance, IUCN, EU IUU Coalition

WWF European Policy Programme (WWF EPO)

A SUMMARY OF THE ENTITY

WWF European Policy Programme (WWF EPO) is an independent legal entity, registered in Belgium, but it belongs to WWF Network, a network created and managed by *WWF (World Wide Fund For Nature)*¹³⁰, which is a foundation under Swiss law established in 1961.

This WWF Network includes:

- WWF International
- Programme Offices [*like that of the EU*]
- National Organisations

The financial situation of **WWF Network** (including WWF International, programme offices and national organisations) is as follows¹³¹:

Income: €888 million

56%	individuals
17%	public sector
9%	trusts & foundations
8%	corporations
4%	earned income
6%	others

Expenses: €738 million

49%	programmes
21%	fundraising
14%	awareness and education
12%	administration
5%	conservation policy

According to the *WWF (World Wide Fund For Nature) Statutes*¹³², there is a "WWF Council" that serves as a forum for national organisations, providing advice to the International Board. The Council appoints the members of the International Board (except

¹³⁰ Véase la página web del WWF (World Wide Fund for Nature)

https://wwf.panda.org/discover/about_wwf/how_were_run/statutes/ (31/07/2023)

¹³¹ Véase WWF International, *Annual Review 2020*, p. 57

https://wwfint.awsassets.panda.org/downloads/wwfintl_annualreview2020.pdf

¹³² See https://wwf.panda.org/discover/about_wwf/how_were_run/statutes/

for its President). The Council members are the Presidents of the national organisations and WWF Associates, as well as the Presidents and Vice Presidents Emeritus, who are also full members.

The International Board of Trustees has 13 members - and it is this board that has the authority to establish national organisations or admit an existing organisation as a national WWF organisation. National organisations are bodies that sign an agreement with WWF (World Wide Fund for Nature) to carry out their tasks and must manage their finances according to the standards of the umbrella organisation.

→ All the information below refers to **WWF EPO**

I. Data on its creation¹³³

Year	2005
Country of registration	Belgium AISBL (number 0460.057.241)
Founder	Presumed to be WWF
Background of its creation	-

II. Data on the association

Director WWF EPO	Ester ASIN
MEMBERS	-
Participation in alliances/networks	It is part of the WWF Network. Green 10 coalition CONCORD Climate Action Network (CAN) Europe Sustainable Europe coalition

¹³³

See https://www.ejustice.just.fgov.be/tsv_pdf/2006/03/10/06048216.pdf

	Living Rivers Europe coalition European Habitats Forum (EHF) Offshore Coalition for Energy and Nature EU IUU Fishing Coalition EU Fisheries Control Coalition.
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III. SPHERES OF ACTION

In general terms, WWF EPO's objective is to contribute to the formulation of EU policies that have an environmental impact at both the European and international levels, and thus contribute to WWF's overall mission.

Its mission is to:

- stop the degradation of the planet's environment
- conserve biological diversity
- ensure the sustainable use of renewable natural resources
- promote the reduction of pollution and irresponsible consumption

In the European context, it emphasises continuing to work with the European institutions and Member States to ensure the effective implementation of a regulatory framework that guarantees a thriving blue economy, sustainable seafood and renewable energy¹³⁴.

B ECONOMIC & FINANCIAL SITUATION¹³⁵

Presupuesto total (2022)	€5,326,604	
Operating Expenses for Activities related to the EU	n/a	
Equity	n/a	
Public funds (2021)		

¹³⁴ See WWF EPO, Annual Report 2022, p. 55,
https://wwfeu.awsassets.panda.org/downloads/wwf_epo_2022_annual_report_spreads.pdf

¹³⁵ See WWF EPO, Annual Report 2022, [...] op. cit, p. 55.

The annual accounts are available on the website of the National Bank of Belgium – Central Balance Sheet Office, <https://consult.cbso.nbb.be/consult-enterprise>

Funds received (2021)	WWF Network: 2,754,107	52%
	Trusts & Foundations: 1,387,306	26%
	UE & Public sector partners	22%
	Others: 27,343	1%
Financial support (2021)¹³⁶	WWF EPO is supported by foundations, both financially and for policymaking ¹³⁷ : - European Climate Foundation, - KR Foundation, - Walton Family Foundation, - Oceans 5 - National Philanthropic trust, - Stichting The Flotilla Charitable Foundation - Ocean Azul Foundation.	
Total expenses	5,163,619	
	- Oceans: 495,588	10%
	- Climate and Energy: 670,522	13%
	- Biodiversity: 350,824	7%

C SPECIAL FEATURES of the Entity

The high level of TRANSPARENCY of both WWF EPO and *WWF (World Wide Fund For Nature)* is noteworthy.

¹³⁶ See WWF EPO, Annual Report 2022, [...] op. cit, p. 55 (2.08.2023)

¹³⁷ See WWF EPO, Annual Report 2022, [...] op. cit, p. 53 (2.08.2023)

ADESSIUM FOUNDATION

A SUMMARY OF THE ENTITY¹³⁸

I. Data on its creation

Year	2005
Country of registration	Netherlands. Under Dutch law, it is an “ <i>Algemeen Nut Beogende Instelling</i> ” (ANBI” which is a public charity)
Founder	Familia VAN VLIET family
Background of its creation	Family foundation; a family with experience in asset management.

II. Data on the foundation

President	Rogier VAN VLIET
Donors	It receives regular donations from an affiliated foundation that oversees the capital reserves of the Van Vliet family. It receives donations only from the family.¹³⁹

¹³⁸ See Adessium Foundation, *Annual Report 2021*, <https://www.adessium.org/documents/annual-report-2021.pdf>, pp. 58 – 61 (2.08.2023)

¹³⁹ See Adessium Foundation, *Annual Report 2021*, [...] op. cit, p. 59 (2.08.2023)

Collaborators	In 2021, it worked with a total of 107 organisations from numerous areas. ¹⁴⁰
Participation in alliances/networks	Seas at Risk
Participation as donors in these organisations (among others)	Oceana International, Oceana Europa Oceans 5 Client Earth Global Fishing Watch

III. SPHERES OF ACTION

The Foundation is not only dedicated to supporting environmental projects, but also focuses its efforts on a wide range of areas, from child protection (*Defence for Children*), migration (*European Programme for Integration and Migration*), freedom of journalism (*Reporters without Borders*), human rights (*Human Rights Watch*), health (*Vrije Universiteit/Cancer Center Amsterdam*), etc.¹⁴¹

B ECONOMIC & FINANCIAL SITUATION

Total income	n/a
Total expenses (2021)¹⁴²	€16.872 million
Grants	€15.635 million L “People & Nature” Programme: €4.524 million
Equity	n/a
Public funds	no

¹⁴⁰ See Adessium Foundation, *Annual Report 2021*, [...] op. cit, p. 58 (2.08.2023)

¹⁴¹ See Adessium Foundation, *Annual Report 2021*, [...] op. cit, p. 58 (2.08.2023)

¹⁴² See Adessium Foundation, *Annual Report 2021*, [...] op. cit, p. 61 (2/08/2023)

Private funds	From family assets
Grants awarded to	They have active collaborations on 113 projects (with 107 organisations) ¹⁴³

C SPECIAL FEATURES of the entity

It formed **Oceans 5** together with other organisations.

It is not registered in the EU Transparency Register.

¹⁴³ See Adessium Foundation, *Annual Report 2021*, <https://www.adessium.org/documents/annual-report-2021.pdf>, p. 58 (2.08.2023)

ARCADIA PHILANTHROPIC TRUST

A SUMMARY OF THE ENTITY

I. Data on its creation¹⁴⁴

Year	2002	
Country of registration	United Kingdom. It is a CIO (<i>Charitable Incorporated Organisation</i>), registered in the <i>Charity Commission for England and Wales</i> (No. 1170621) ¹⁴⁵	It is not recognised by the public authority <i>HM Revenue and Customs</i> for tax relief
Founders	Prof. Peter BALDWIN Dr. Lisbet RAUSING ¹⁴⁶	L. Rausing's grandfather was a co-founder of <i>Tetra Pak</i>
Background of its creation	The trustee is a company from Liechtenstein: " <i>The trustee is Talvik Trust Services AG, a licensed trust company regulated by the Liechtenstein Financial Market Authority</i> ". ¹⁴⁷	

II. Data on the foundation¹⁴⁸

¹⁴⁴ See the *Arcadia Philanthropic Trust* website <https://www.arcadiahfund.org.uk/how-we-operate> (1.08.2023)

¹⁴⁵ See Charity Commission for England and Wales, *Arcadia Charitable Trust*, <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5086466/governance> (1.08.2023)

¹⁴⁶ According to a press article, the combined / net equity of Hans, Marit, *Lisbet* and *Sigrid* Rausing is of £9,490 million, see KentOnline, 20.5.2022, "Rausing family named 15th richest in The Sunday Times 2022 Richt List", <https://www.kentonline.co.uk/kent/news/kents-richest-people-including-family-worth-9bn-267484/> (26.4.2023)

¹⁴⁷ See the *Arcadia Philanthropic Trust* website, "FAQs" in section "Are you a registered charity", <https://www.arcadiahfund.org.uk/how-we-operate> (2.08.2023)

¹⁴⁸ Ibidem

CEO	Simon CHAPLIN
Donors	It receives donations only from family trusts. ¹⁴⁹
Collaborators	EJF ¹⁵⁰ Oceans 5: Grant from Arcadia to Oceans 5 in 2023 for \$25 million ¹⁵¹ for 5 years
Participation in alliances/networks	Co-initiator of “PROTECTING OUR PLANET”

III. SPHERES OF ACTION

Arcadia helps preserve endangered cultures, protect endangered nature and promote open access.

B ECONOMIC & FINANCIAL SITUATION

Total income	n/a
Total grants awarded (2021)¹⁵²	USD 141.052 million L “Protecting Endangered Nature” programmes: USD 81.696 million
Equity	n/a

¹⁴⁹ Ibidem

¹⁵⁰ See grants awarded to EJF over several years at <https://arcadiahfund.org.uk/grants-awarded?recipient=%5B%22environmental-justice-foundation%22%5D#grant-list> (03.12.2024)

¹⁵¹ See grants awarded to Oceans 5 for the “Marine Protection Fund” programme in 2023 at <https://arcadiahfund.org.uk/grants-awarded?recipient=%5B%22oceana-inc%22%5D#grant-list> (03.12.2024)

¹⁵² ARCADIA, *2021 Annual Summary*, [...] op. cit, p. 5, (consulted on 26.4.2023)

Public funds	no
Private funds	From family trusts. The only trustee is <i>Talvik Trust Services AG</i> , registered in Liechtenstein
Grants awarded to (among others)¹⁵³	Deep Sea Conservation Coalition EJC Oceana Oceans 5

C SPECIAL FEATURES of the entity

It is a member of OCEANS 5.

It collaborates with the PROTECTING OUR PLANET CHALLENGE alliance.

As its website displays all types of information about the grants it has awarded, it can be said that it has a high degree of transparency.

¹⁵³ See the information provided by ARCADIA “Grants Directory” accessible at <https://www.arcadiahfund.org.uk/grant-directory> (consulted on 26.4.2023)

BLOOM ASSOCIATION

A SUMMARY OF THE ENTITY

I. Data on its creation¹⁵⁴

Year	2005	
Country of registration	France	It has offices in Paris and Hong Kong (the latter focusing on shark conservation)
Founder	Claire NOUVIAN ¹⁵⁵	Since April 2022, she has been a member of the Board of Directors of the " <i>Sea Around Us</i> " project, which was started by D. Pauly at the University of British Columbia ¹⁵⁶ (he is now a Senior Staff Member) and which includes Rashid Sumaila.
Background of its creation	Author of the book "The Deep," journalist, activist	

II. Data on the association

HONORARY CHAIR of the Board	Claire NOUVIAN ¹⁵⁷	
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¹⁵⁴ See the Bloom website <https://bloomassociation.org/notre-mission/> (3.08.2023)

¹⁵⁵ See the Bloom website <https://bloomassociation.org/nous-connaître/lequipe-bloom/> (03.12.2024)

¹⁵⁶ See the Bloom website <https://www.bloomassociation.org/en/about-us/the-team-at-bloom/claire-nouvian/> (3.08.2023)

¹⁵⁷ Ibidem

CHAIR of the Board	Flavien KULAWIK	
Donors	<i>See below in section B</i>	
Collaborators (also with companies)	The following entities are listed on its website¹⁵⁸: - AFD - Alternatiba - Ashoka - Attac - Biocoop - Collège culinaire de France - Euro-Toques - Foodchéri - Foodwatch - Guide Michelin - Issey Miyake Men - Lush - Nature et Découvertes - Plateforme Petite pêche - Pleine Mer - Relais&Châteaux The annual report of 2021 lists 125 collaborating companies - although it does not specify how they contribute (financial, personal, etc.)¹⁵⁹	
Participation in alliances/networks¹⁶⁰	DEEP SEA CONSERVATION COALITION (since 2007)	They are also part: Conservation International, EJJ, Greenpeace, Oceana,

¹⁵⁸ See the Bloom website <https://bloomassociation.org/nous-connaître/nos-partenaires/nos-partenaires-strategiques/> (3.08.2023)

¹⁵⁹ See BLOOM, *L'essentiel – Rapport d'Activités 2020-21*, <https://bloomassociation.org/wp-content/uploads/2022/06/RA-20-21-FR-web.pdf>, p. 36 (3.08.2023)

¹⁶⁰ See the Bloom website <https://bloomassociation.org/nous-connaître/nos-partenaires/nos-partenaires-strategiques/> (fecha de consulta 26.4.2023)

	ON THE HOOK	Pew, Seas at Risk, Blue Marine Foundation EJF, Blue Marine Foundation Blue Marine Foundation
	COALITION FOR TRANSPARENT TUNA FISHERIES ¹⁶¹	
	Make Stewardship Count	
	Réseau Action Climat	
	Stop TAFTA / CETA / UE-MERCOSUR	

III. SPHERES OF ACTION

Generally speaking, its mission is to preserve the marine environment and species from unnecessary destruction, and to increase social benefits from fishing.¹⁶²

They focus their actions on 3 spheres:

- Preserve deep waters
- Safeguard endangered species, fighting indifference toward the extinction of the oldest fish on our planet: sharks
- Ensure the survival of fishermen, particularly by addressing the issue of public subsidies to the fishing sector

They identify 5 strategies:

- Change public policies

¹⁶¹ See the CTTF website

[https://cttf.uk/#:~:text=The%20Coalition%20for%20Transparent%20Tuna%20Fisheries%E2%80%99%20%28CTTF%29%20brings,gears%20they%20use%2C%20are%20having%20on%20ocean%20biodiversity\(3.08.2023\)](https://cttf.uk/#:~:text=The%20Coalition%20for%20Transparent%20Tuna%20Fisheries%E2%80%99%20%28CTTF%29%20brings,gears%20they%20use%2C%20are%20having%20on%20ocean%20biodiversity(3.08.2023))

¹⁶² See the Bloom website <https://www.bloomassociation.org/en/about-us/our-mission/> (1.08.2023)

- Change private and industrial practices
- Conduct independent research
- Change consumer habits
- Educate the public, children and future decision-makers.

B ECONOMIC & FINANCIAL SITUATION¹⁶³

Operating budget (2021)	€1,041,258	
Operating expenses	n/a	
Equity	n/a	
Public funds	n/a	
Private funds received		
- Entities (NGOs, companies, individuals)	8 Foundations (in €) = 14% of the total budget <u>French:</u> 1) - Fondation AnBer: 5,000 2) - Fondation Lemarchand: 30,000 3) - Fondation Ensemble: 3,000 4) - Fonds de dotation 1% pour la - Planète: 16,000 5) - Fondation Sophie Rochas: 10,000 <u>International:</u> - Synchronicity: 43,109	2021

¹⁶³ See the Bloom website <https://bloomassociation.org/nous-connaître/nos-financements/> (consulted on 28.2.2023)

	- Levine Family Foundation: 39,497 - Georg Waechter Memorial Foundation: 19,146 Companies = 6% 78% of BLOOM's budget for 2021 came from individuals	2020
	In 2020, 22% of the total budget came from foundations, including the following international foundations (in €): - Levine Family Foundation: 10,833 - The Waterloo Foundation: 23,000 - Georges Wachter Memorial: 41,705 - Oak Foundation (Funding Fish): 116,834 - Synchronicity: 43,109	

C SPECIAL FEATURES of the Entity

1. It initiated the following campaigns¹⁶⁴:

- **Campaign against FEAMP (2021-2027)** involving the following entities:
 - [BirdLife](#), Europe & Central Asia
 - [ClientEarth](#), Belgium
 - [Seas at Risk](#), Belgium
 - [WWF Europe](#), Europe
- **Campaign against electrofishing (2017-2021)**

¹⁶⁴ See the Bloom website <https://bloomassociation.org/nous-connaitre/nos-partenaires/nos-partenaires-strategiques/> (consulted on 26.4.2023)

- **Campaign against bottom trawling** (2012-2016) with:
 - [BirdLife](#), Europe & Central Asia
 - [ClientEarth](#), Belgium
 - [Deep sea conservation coalition](#), Netherlands
 - [Seas at Risk](#), Belgium
 - [WWF Europe](#), Europe

2. “Mécénat de compétences” = skill-based sponsorship

According to available information, 78% of BLOOM's budget for 2021 came from individuals and “mécénat de compétences” (“skill-based sponsorships”)¹⁶⁵. The latter is a sponsorship system in which company employees put their skills at the service of an NGO or association. It does not specify exactly which companies made which skills available to them and what percentage of the 78% of the total budget.

3. High degree of TRANSPARENCY

The website offers varied and detailed information on its funding sources and the entities from which they come.

¹⁶⁵ See the Bloom website <https://bloomassociation.org/nous-connaitre/nos-financements/> (1/08/2023)

BLUE MARINE FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation¹⁶⁶

Year	2010	
Country of registration	United Kingdom	Registered in the <i>Charity Commission for England and Wales</i> (No. 1137209) ¹⁶⁷
Co-founders	George DUFFIELD Chris Gorell BARNES Charles CLOVER	Duffield: Founding partner of <i>Ocean 14 Capital (Impact investment fund for the Oceans)</i> Barnes: Founder of <i>Adjust Your Set</i> , a brand communications agency
Background of its creation¹⁶⁸	They founded the Blue Marine Foundation after making the documentary “The End of The Line”	Duffield (Producer) Barnes (Executive Producer) Based on the book of the same name by Charles Clover

¹⁶⁶ See the Blue Marine Foundation website, <https://www.blumarinefoundation.com/about/> (1.08.2023)

¹⁶⁷ Charity Commission for England and Wales, Blue Marine Foundation, <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/4050658> (1.08.2023)

¹⁶⁸ See the Blue Marine Foundation website, <https://www.blumarinefoundation.com/about/people/> (1.08.2023)

II. Data on the foundation

Executive Director	Charles CLOVER (and also co-founder)
CEO	Clare BROOK
Donors	<i>See below</i>
Partners¹⁶⁹	<u>Main Partners</u> (all companies) - Christopher Ward (<i>watch brand</i>) - Vita (<i>electric leisure boat builder</i>) - Lürssen (<i>astillero alemán</i>) - RBC BlueBoy Asset Management - Bucherer Blue (<i>watch brand</i>) - Burgess (<i>luxury yachts</i>) - Elizabeth Scarlett (<i>accessories</i>) - Moke (<i>beach vehicles</i>) - Golden Acre Foods (<i>food distributor</i>) <u>Corporate partners</u> - Adnams Southwold - Barclays* - Bluegame - West - Yachting Pages Media Group - Mr & Mrs Smith (The travel club for hotel lovers) - Tokio Marine Kiln - ATPi Halo - Gentoo Sailing Team - HumanForest - Wallien - 11th Hour Racing * <i>Barclays</i>: according to the EU Transparency Register, Barclays contributed an amount of €1,953,910 in the financial year 04.2021-03.2022¹⁷⁰

¹⁶⁹ See the Blue Marine Foundation website, <https://www.blumarinefoundation.com/support-us/partner-with-us/> (3.08.2023)

¹⁷⁰ European Union Transparency Register, Blue Marine Foundation, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=511577736930-64 (11.12.2024)

	<u>Charitable entities (trusts) and foundations:</u> - Adessium - Brook Foundation - Flotilla Foundation - Disney Conservation Fund - Eurofins Foundation - Garfield Weston Foundation - Swarovski Foundation - AIM The Foundation - The EQ foundation - John Ellerman Foundation - Calouste Gulbenkian Foundation (UK -Branch) - UBS Optimus foundation - Postcode Lottery UK - The Waterloo Foundation - Smile Wave - Fondation Philanthropia Lombard Odier - Fondazione Capellino - Ardevora
Participation in alliances/networks	ON THE HOOK (https://onthehook.org.uk/) DEEP SEA CONSERVATION COALITION (https://savethehighseas.org/about-us/members/) NGO TUNA FORUM (https://ngotunaforum.org/participating-organizations/) COALITION FOR TRANSPARENT TUNA FISHERIES (https://cttf.uk/)

III. SPHERES OF ACTION

The mission of the foundation is to restore the oceans and recover their health by addressing overfishing, which it describes as one of the world's greatest environmental problems. Its goal is to ensure that at least 30% of the oceans are effectively protected and the remainder is responsibly managed.¹⁷¹

¹⁷¹ See the Blue Marine Foundation website, <https://www.bluemarinefoundation.com/about/> (3.08.2023)

According to the information provided in the UK Register of Charities, BLUE “(...) *exists to combat overfishing and the destruction of biodiversity through the creation of large-scale marine reserves and by delivering new models of sustainable fishing.*”¹⁷²

It identifies 5 strategic spheres¹⁷³:

- Secure MPAs
- Develop sustainable fishing models that demonstrate that low-impact fishing benefits everyone
- Restore marine habitats to recover and protect vulnerable species and sequester carbon
- Highlight unsustainable fishing practices
- Connect people to the sea and improve their knowledge

It defines itself as:

*“Blue Marine is filling a niche in the NGO world, enabling marine conservation to happen fast and effectively. What differentiates Blue Marine is that we are well connected and determined; we seize opportunities as they arise and get things done. We forge new partnerships and challenge the status quo.”*¹⁷⁴

B ECONOMIC & FINANCIAL SITUATION

Total income¹⁷⁵ (03.2022)	£7,790,188	
Operating expenses (03.2022)	£6,208,722	
Equity (03.2022)	£8,095,949	

¹⁷² Charity Commission for England and Wales, Blue Marine Foundation, <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/4050658> (3.08.2023)

¹⁷³ See the Blue Marine Foundation website, <https://www.blumarinefoundation.com/about/> (3.08.2023)

¹⁷⁴ See the Blue Marine Foundation website, <https://www.blumarinefoundation.com/about/> (3.08.2023)

¹⁷⁵ BLUE MARINE FOUNDATION, *Report and consolidated financial statements*, https://register-of-charities.charitycommission.gov.uk/charity-search?p_p_id=uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet&p_p_lifecycle=2&p_p_state=maximized&p_p_mode=view&p_p_resource_id=%2Faccounts-resource&p_p_cacheability=cacheLevelPage&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_objectiveId=A12823600&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_mvcRenderCommandName=%2Faccounts-and-annual-returns&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_organisationNumber=4050658, pp. 58-59 (3.08.2023)

Public funds	no	
Private funds (2021)	yes	
Notable... ¹⁷⁶	£3,661,523 £819,917 £1,967,200 It includes the following foundations: AIM Foundation Ardevora Charitable Trust Calouste Gulbenkian Foundation Ciner Charitable Trust Clore Duffield Foundation EQ Foundation Flotilla Foundation Fondation Philanthropia Fondazione Capellino Garfield Weston Foundation Givingforce Foundation Hughes Charitable Foundation J R Asprey Family Charitable Trust John Ellerman Foundation Kindlink Foundation National Fish and Wildlife Foundation P M Major Charitable Trust Portrack Charitable Trust Ruth Smart Foundation Severn Rivers	Donations from companies Value of Pro-Bono Support Donations from private foundations

¹⁷⁶ BLUE MARINE FOUNDATION, Report and consolidated financial statements, https://register-of-charities.charitycommission.gov.uk/charity-search?p_p_id=uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet&p_p_lifecycle=2&p_p_state=maximized&p_p_mode=view&p_p_resource_id=%2Faccounts-resource&p_p_cacheability=cacheLevelPage&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_objectiveId=A12823600&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_mvcRenderCommandName=%2Faccounts-and-annual-returns&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_organisationNumber=4050658, p. 65 (3.08.2023)

	Trust Somerset Wildlife Trust Sussex Wildlife Trust Swarovski Foundation Swiss Philanthropy Foundation The Addo Trust The Charities Trust The Whitley Animal Protection Trust UBS Optimus Foundation UK Online Giving Foundation <u>Waterloo Foundation</u> Wildflowl & Wetlands Trust Zoological Society of London	
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C SPECIAL FEATURES of the entity

Most grants (for 2022) come from corporate partners.

Total income has almost quadrupled between 2018 (2.08 million) and 2022 (7.79 million).¹⁷⁷

¹⁷⁷ Charity Commission for England and Wales, Blue Marine Foundation, <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/4050658/financial-history> (3.08.2023)

CONSERVATION INTERNATIONAL

A SUMMARY OF THE ENTITY

I. Data on its creation

Year	1987 ¹⁷⁸	
Country of registration	USA	It is a “Section 501(c)(3)” organisation ¹⁷⁹
Founders	Peter SELIGMANN ¹⁸⁰	
Background of its creation	Seligmann previously worked at <i>The Nature Conservancy</i>	

II. Data on the foundation

CEO	M. SANJAYAN ¹⁸¹	
Donors to Conservation International	<i>Walton Family according to the foundation's database, donated the following amounts to IC¹⁸²:</i> - 22 MPAs: to ensure their progress in the Eastern Tropical Pacific (2020)	Among others, by way of example USD 200,000

¹⁷⁸ See the Conservation International website <https://www.conservation.org/> (1.08.2023)

¹⁷⁹ See the Conservation International website https://www.conservation.org/docs/default-source/publication-pdfs/ci-fy21-form-990-pub-insp.pdf?sfvrsn=64062485_3 (1.08.2023)

¹⁸⁰ See “Form 990 1.7.2021 – 30.6.2022, <https://www.conservation.org/experts-list/peter-seligmann> (1.08.2023)

¹⁸¹ See the Conservation International website <https://www.conservation.org/about/senior-staff> (1.08.2023)

¹⁸² See the database of *Walton Family Foundation*, <https://www.waltonfamilyfoundation.org/grants-database?grantee=00000169-91e5-d2a9-a7eb-bffd56270000> (1.08.2023)

	- COVID-19 Emergency Fund to Ecuador Azul & La Minga Funda to support marine conservation (2020)	USD 533,800
	- Help Ecuador Azul ensure the protection of five MPAs (2019) ...	USD 1,071,164
ALLIANCES / NETWORKS	DEEP SEA CONSERVATION COALITION BLUE NATURE ALLIANCE (this alliance is based at the same mailing address as Conservation International)	with Pew, gef (Global Environmental Facility – World Bank), Rob & Melani Walton Foundation, Minderoo Foundation

III. SPHERES OF ACTION

They define 3 priorities¹⁸³:

- Stabilise the climate by protecting and restoring nature
- Double **ocean protection**: support coastal states in protecting and monitoring their waters, link coastal habitats to climate policies, and disrupt harmful practices in the fishing value chain. They have a Centre for Oceans.
- Expand/promote planet-positive economies

¹⁸³

See the Conservation International website <https://www.conservation.org/about> (1.08.2023)

B ECONOMIC & FINANCIAL SITUATION

Total income (2021) ¹⁸⁴	USD 217.7 million	
Operating expenses (2021)	USD 159.4 million	
Equity (2021)	USD 380.6 million	
Public funds	yes	21%
• Source	n/a	
• Amount (2021) ¹⁸⁵	USD 45.7 million	
Private funds		34%
• Sources	Foundations: USD 73.7 million	
	Net income from investments: USD 50.4 million	
	Comanies: USD 9.5 million ...	

C SPECIAL FEATURES of the entity

¹⁸⁴ Conservation International, *Not a moment to lose. 2021 Annual Report*, https://cicloud.s3.amazonaws.com/docs/default-source/s3-library/publication-pdfs/fy21-annual-report-web.pdf?sfvrsn=22856bco_3, pp. 100 – 103 (1.08.2023)

¹⁸⁵ Conservation International, *Not a moment to lose. 2021 Annual Report*, [...] op. cit p. 103 (1.08.2023)

GLOBAL FISHING WATCH

A SUMMARY OF THE ENTITY

I. Data on its creation

Year	2017 ¹⁸⁶	
Country of registration	USA. It is a Section 501(c)(3) organisation	
Founding entities¹⁸⁷	Oceana Skytruth Google	
Background of its creation¹⁸⁸	Brian SULLIVAN (co-founder) John AMOS, (co-founder) Andrew SHARPLESS (co-founder) Jacqueline SAVITZ (co-founder)	Google Earth Outreach (Senior Programme Manager) SkyTruth (President) Oceana (CEO) Oceana (Chief Policy Officer for North America)

¹⁸⁶ Global Fishing Watch, *Audited Financial Statements December 31, 2020 and 2019*, <https://globalfishingwatch.org/wp-content/uploads/GFW-2020-Audit.pdf>, p. 9 (1.08.2023)

¹⁸⁷ See the Global Fishing Watch website, <https://globalfishingwatch.org/about-us/> (1.08.2023)

¹⁸⁸ See the Global Fishing Watch website, <https://globalfishingwatch.org/leadership/> (1.08.2023)

II. Data on the entity

Chairman of the Board	Brian SULLIVAN (<i>Google Earth Outreach</i>)
Collaborators¹⁸⁹ ☐ The exact support is not detailed - reference is made to “Our supporters”	- Adessium - Bloomberg Philanthropies - Catena Foundation - Dona Bertarelli Philanthropy - Dutch Postcode Lottery - Fisheries and Oceans Canada - Flora Family Foundation - Fondation Didier et Martine Primat - Gordon and Betty Moore Foundation - Islas Secas Foundation - Japan Fisheries Research and Education Agency - Marisla Foundation - Minderoo Foundation - Oak Foundation - Oceans 5 - Ocean Risk and Resilience Action Alliance - Oceankind - Qualcomm® Wireless Reach™ - Re:wild - The David and Lucile Packard Foundation - The Flotilla Foundation - The Pew Charitable Trusts - The Swedish Postcode Foundation - The Waterloo Foundation - Trygg Mat Tracking - Walmart Foundation - Walton Family Foundation

II. SPHERES OF ACTION¹⁹⁰

Its main mission is to advance sustainable ocean management through greater transparency.

To this end, it offers a mapping platform so that anyone can view or download data and research global fishing activity in near real time, free of charge¹⁹¹.

¹⁸⁹ Véase la página web <https://globalfishingwatch.org/financials/> (4/08/2023)

¹⁹⁰ Global Fishing Watch, *Audited Financial Statements December 31, 2020 and 2019*, [...] op. cit, p. 9 (1/08/2023)

B ECONOMIC & FINANCIAL SITUATION

Total income (2020) ¹⁹²	USD 9.482 million
Operating expenses (2020)	USD 7.274 million
Total equity and liabilities (2020)	USD 8.300 million
Public funds	n/a
Private funds	n/a
• Entities (NGOs, companies, individuals)	
• Sources	
• Amounts (year): the amount granted is for 1 or more years	

C SPECIAL FEATURES of the Entity

It has a large number of collaborators, including Oceans 5, Adessium, [Gordon and Betty Moore Foundation](#), Marisla Foundation, [Oak Foundation](#), [The David and Lucile Packard Foundation](#), [The Pew Charitable Trusts](#), Walton Family Foundation - but their specific contributions to Global Fishing Watch are unknown.

¹⁹¹ Véase el mapa en la siguiente página web: <https://globalfishingwatch.org/map/index?start=2024-09-01T00%3A00%3A00.000Z&end=2024-12-01T00%3A00%3A00.000Z&longitude=26&latitude=19&zoom=1.49> (04.12.2024)

¹⁹² Global Fishing Watch, *Audited Financial Statements December 31, 2020 and 2019*, [...] op. cit, p. 3 y 4 (4.08.2023)

GORDON & BETTY MOORE FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation¹⁹³

Year	2000	
Country of registration	USA	It is a private foundation but meets the requirements of "Section 501(c)(3)"
Founders	Gordon & Betty MOORE	He was a co-founder of <i>Intel Corporation</i>
Background of its creation	The initial endowment was of 175 million in Intel shares ¹⁹⁴ .	

II. Data on the foundation¹⁹⁵

President	Harvey V. FINEBERG
ALLIANCES / NETWORKS	PROTECTING OUR PLANET

III. SPHERES OF ACTION

It was established to generate positive results for future generations and defined 4 spheres of action¹⁹⁶:

- Scientific research

¹⁹³ See the website <https://www.moore.org/about/our-founders> (2.08.2023)

¹⁹⁴ Moore Foundation, *Our Timeline. Annual Report 2015*, <https://www.moore.org/AnnualReport2015/Index.html> (1.08.2023)

¹⁹⁵ See the website <https://www.moore.org/people> (1.08.2023)

¹⁹⁶ See the website <https://www.moore.org/> (1.08.2023)

- Environmental conservation
- Improve patient care
- Preserve San Francisco Bay and its special features

B ECONOMIC & FINANCIAL SITUATION

Total income (2021)¹⁹⁷	USD 804.907 million
Operating expenses (2021)	USD 408.691 million
Total liabilities and equity (2021)	USD 8,574.58 million (<i>USD 8,574,582.511</i>)
Public funds	no
Private funds	yes
Grants awarded to	All grants awarded are published in a 572-page document¹⁹⁸ Examples include: - PEW, a total of USD 720,000 in 2021¹⁹⁹ - OCEANA Canada USD 250,000 to support Canadian sustainable fisheries²⁰⁰ - CONSERVATION INTERNATIONAL, a total of USD 6,832,400 in 2021²⁰¹

¹⁹⁷ Moore Foundation, *Form 990-PF*, [https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-\(full-return\)](https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-(full-return)) (1.08.2023)

¹⁹⁸ See informaion on the website [https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-\(full-return\)](https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-(full-return)), (03.12.2024)

¹⁹⁹ See the document published on the website [https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-\(full-return\)](https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-(full-return)), po. 199-200 (03.12.2024)

²⁰⁰ See the document published on the website [https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-\(full-return\)](https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-(full-return)), p.193 (03.12.2024)

²⁰¹ See the document published on the website [https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-\(full-return\)](https://www.moore.org/docs/default-source/our-finances/tax-returns-and-990s/2021/2021-form-990-pf-(full-return)), p. 110-111 y 490 (03.12.2024)

	□ USD 6,150,000 contribution to the launch of the <i>Blue Nature Alliance for Ocean Protection</i>
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C SPECIAL FEATURES of the Entity

In 2017, Gordon & Betty Moore were recognised as California's top philanthropists²⁰².

High degree of transparency.

²⁰² See the website <https://www.moore.org/about/our-founders> (4.08.2023)

GREENPEACE INTERNATIONAL

A SUMMARY OF THE ENTITY

I. Data on its creation²⁰³

Year	1979	
Country of registration²⁰⁴	Netherlands The name of the legal entity is "Stichting Greenpeace Council" (SGC, GPI). It is registered in the <i>Dutch Chamber of Commerce</i> no. 41200515; its tax identification number is RSIN (tax) 006623207.	"Greenpeace" is a global network of 26 national/regional organisations + "Stichting Greenpeace Council".
Founders	A group of activists	
Background of its creation	1971, opposition to US nuclear testing in Alaska	

II. Data on the entity

Interim Co-Chair Interim Co-Chair	David TONG²⁰⁵ Marcelo INIARRA
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²⁰³ See the website <https://www.greenpeace.org/international/explore/about/about-us/> (1.08.2023)

²⁰⁴ GREENPEACE, *Greenpeace International Annual Report 2021*, <https://www.greenpeace.org/static/planet4-international-stateless/2022/06/9888a8ad-greenpeace-international-annual-report-2021.pdf> (1.08.2023), p. 3

²⁰⁵ See the website <https://www.greenpeace.org/international/explore/about/governance/> (1.08.2023)

Partners	<i>See below</i>
Participation in alliances/networks	NGO TUNA FORUM

III. SPHERES OF ACTION

Broadly speaking, Greenpeace is dedicated to the following spheres of action²⁰⁶:

- **Energy.** They aim to challenge the power of Big Oil, promote support for renewable energy and hold major polluters accountable
- **Nature,** which includes extreme weather events, fires, food, forests and oceans.
- **People.** They want to end the "complicity" between governments and companies to obtain profits at the expense of people and the planet (focus on climate, consumption and health)

B ECONOMIC & FINANCIAL SITUATION

Total income (2021)²⁰⁷	€93.74 million	€89.10 million from <i>Greenpeace Organisations</i> ²⁰⁸ - Greenpeace Germany (largest contributor): €23.94 million - Greenpeace Spain: €4.62 million
Total expenses (2021)²⁰⁹	€82.55 million	of which... - €1.648 million on "Oceans" campaigns

²⁰⁶ See the website <https://www.greenpeace.org/international/explore/> (1.08.2023)

²⁰⁷ Stichting Greenpeace Council and Related Entities, *Annual Financial Report 2021*, <https://www.greenpeace.org/static/planet4-international-stateless/2022/07/5573ae8d-stichting-greenpeace-council-financial-statements-2021.pdf> (1.08.2023), p. 39

²⁰⁸ Stichting Greenpeace Council and Related Entities, *Annual Financial Report 2021*, [...] op. cit, p.

68

²⁰⁹ Stichting Greenpeace Council and Related Entities, *Annual Financial Report 2021*, [...] op. cit, p. 39

		- €17.437 million in support of "Marine Operation and Action Support" campaigns - €32.033 million to Greenpeace Organisations
Total equity and liabilities (2021)	€80.05 million ²¹⁰	("Total equity and liabilities")
Public funds	n/a	
Private funds		
• Entities (NGOs, companies, individuals)	From other Greenpeace organisations	

C SPECIAL FEATURES of the entity

High degree of transparency.

GREENPEACE EUROPEAN UNIT²¹¹:

- Organisation: This is a non-profit organisation under Belgian law. Its general assembly is made up of the executive directors and programme directors of Greenpeace's European offices, as well as the executive directors and programme director of Greenpeace International.

- Financial data:

- Total income: €1,842,156
- Total operating expenses: €1,842,156

The annual financial report does not indicate whether the Greenpeace Council Stichting transfers funds to or receives funds from the Greenpeace European Unit. Given its organisation, it is assumed that its income is contributed by European regional organisations, such as the Greenpeace Association Spain.

²¹⁰ Stichting Greenpeace Council and Related Entities, *Annual Financial Report 2021*, [...] op. cit p. 38

²¹¹ Greenpeace European Unit, Funding and Transparency, see the webpage <https://www.greenpeace.org/eu-unit/funding-and-transparency/> (1.08.2023)

GREENPEACE ASSOCIATION SPAIN

- Organisation: This is an Association under Spanish law.

- Financial data²¹²:

- Total income:	€17,264,763
Membership fees _____	€16,698,489
Donations _____	€366,450
Inheritances _____	€189,775

...

- Total operating expenses:	€15,938,908
Contributions to campaigns	
intern. & Europ. _____	€4,832,571
National campaigns _____	€4,164,519

...

²¹² Greenpeace Association Spain, *Our Accounts in 2021*, <https://es.greenpeace.org/es/quienes-somos/informes-anuales/informe-anual-2021/nuestras-cuentas-2021/> (1.08.2023)

For further information, see: Greenpeace Association Spain, *Annual Accounts for the year ending December 31, 2021*, https://es.greenpeace.org/wp-content/uploads/sites/3/2022/06/CCAA-Greenpeace-2021-con-IA_signed.pdf (1.08.2023)

LEVINE FAMILY FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation²¹³

Year	2018	
Country of registration	United Kingdom	It is registered in the <i>Charity Commission for England and Wales</i> , no. 1178749, but not recognised by HMRC for donations ²¹⁴
Founders	Miranda LEVINE	
Background of its creation	Ben Levine is CEO of LMR Partners, an investment management company	

II. Data on the entity²¹⁵

CEO	Melissa SPITERI
Trustees	Miranda LEVINE Julie ROSALIND MACNABB Kathy LEVINE
Participation in projects with these	BLOOM (for 3 years) Blue Marine Foundation

²¹³ See the website <https://www.levinefamilyfoundation.com/about> (4.08.2023)

²¹⁴ See the website web <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5115284/governance> (1.08.2023)

²¹⁵ See the website web <https://www.levinefamilyfoundation.com/about> (4.08.2023)

entities²¹⁶	Clientearth Greenpeace Oceana Seas at Risk
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III. SPHERES OF ACTION

Restore ocean health.

B ECONOMIC & FINANCIAL SITUATION

Total gross income (2021)	£855,000 ²¹⁷
Total expenses (2021)	£476,350
Equity	n/a
Public funds	n/a
Private funds	n/a - It is assumed to come from family assets

C SPECIAL FEATURES of the entity

Lack of publication of certain data on assets, possibly due to its non-recognition by HMRC for donations.

²¹⁶ See information on the website <https://www.levinefamilyfoundation.com/projects> (1.08.2023)

²¹⁷ See the website of Charity Commission for England and Wales, Levine Family Foundation, <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5115284/financial-history> (1.08.2023)

MARISLA FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation

Year	1986 ²¹⁸
Country of registration	USA. "Section 501(c)(3)" Charity
Founder	Anne EARHART
Background of its creation	She is the heir to the estate of <i>Getty Oil</i> magnate J. Paul Getty ²¹⁹

II. Data on the entity

President	Anne EARHART	
Donors	Anne EARHART	

III. SPHERES OF ACTION²²⁰

According to the information provided on the only website available of the Marisla Foundation²²¹, it has two main spheres of action:

²¹⁸ See information found on the website <https://www.influencewatch.org/non-profit/marisla-foundation/> (fecha de consulta 2.5.2023)

²¹⁹ See information found on the website <https://www.philanthropy.com/article/3-women-philanthropists-share-perspectives-on-giving> (fecha de consulta 2.5.2023)

²²⁰ See information found on the website <https://online.foundationsource.com/ws/index.jsp?site=marisla> (2.05.2023)

²²¹ See information found on the website <https://online.foundationsource.com/ws/index.jsp?site=marisla> (2.08.2023)

- **Human Services**, focusing on the needs of women in difficult situations.
- **Environment**. Their activities focus on promoting the conservation of biological diversity and fostering sustainable ecosystem management, with a focus on marine and coastal biodiversity conservation, specifically in California, Northeastern Mexico, Hawaii, Chile and Melanesia/ Micronesia/ Polynesia.

B ECONOMIC & FINANCIAL SITUATION

Total income²²²	USD 35.638 million	2018
	USD 34.472 million	2020
Total expenses	USD 40.184 million	2018
	USD 39.166 million	2020
Equity	USD 23.492 million	2018
	USD 8.33 million	2020
Public funds	n/a	
Private funds	n/a	
Grants awarded to	According to the information found on <i>Oceana</i> , the Marisla Foundation supports more than 150 organisations	

²²² Data for 2018 were obtained from the organisation's official statement, published at <https://projects.propublica.org/nonprofits/organizations/330200133> (2.08.2023)

	dedicated to protecting coasts and oceans every year. ²²³	
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C SPECIAL FEATURES of the entity

Founding entity of OCEANA INTERNATIONAL.

The information was compiled from various websites, but not from the entity itself.

²²³ See the website <https://www.oceananygala.org/anne-earhart-marisla-foundation/> (2.08.2023)

OAK FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation

Year	1983 ²²⁴
Country of registration	The so-called "Foundation" is made up of a group of philanthropic organisations with headquarters in different countries.²²⁵ According to the available information, the legal status of each organisation depends on the country in which it is registered: - Suiza (Oak Philanthropy Limited) - Reino Unido (Oak Philanthropy (UK) Limited) - EE.UU. (Oak Foundation USA) - Dinamarca (Oak Foundation Denmark) - India (Oak Philanthropy Limited) - Zimbabue (Oak Zimbabwe Foundation) 3 of the 6 organisations that make up the so-called "Oak Foundation" are companies (Switzerland, the UK and India). The main "administrative" office of the "Oak Foundation" is located in Switzerland (Geneva). The wording in the annual report leads us to believe, in our opinion, that this is a foundation under Swiss law²²⁶. However, there is no record

²²⁴ See the website <https://oakfnd.org/values-mission-history/> (4.08.2023)

²²⁵ Oak Foundation, Annual Report 2021, <https://oakfnd.org/wp-content/uploads/2022/02/Oak-Foundation-Annual-Report-2021.pdf>, p. 4 (4.08.2023)

²²⁶ "Oak Foundation's main administrative office is in Geneva, Switzerland. We are proud to be here in the human rights capital of the world, among hundreds of not-for-profit organisations, UN organisations, and foundations, all striving to make the world a better, safer, cleaner, fairer place. Oak chose Switzerland for its main administrative office because of its stable and predictable legal, political, and economic system. Switzerland's regulations on charities are clear and support the belief that democratic societies depend on the active participation of civil society organisations. In addition, there is a high concentration of knowledge and expertise in Geneva, which makes recruiting staff easy." (Oak Foundation, Annual Report 2021, <https://oakfnd.org/wp-content/uploads/2022/02/Oak-Foundation-Annual-Report-2021.pdf>, p. 10 (2.05.2023))

	in the official Swiss registries of foundations²²⁷ or companies²²⁸ of an entity called "Oak Philanthropy Limited," as the address of the Swiss office suggests. There are 3 entries in the register of the British Crown Dependency of Jersey with the following names²²⁹: - Oak Philanthropy Holdings Limited - Oak Philanthropy International Limited - Oak Philanthropy Limited The 3 entities have the same address. Further information could be found by requesting certificates - but at first glance, it is not clear what they are. From the above, it can be deduced that: - The "Oak Foundation" is not a single foundation, but an organisation composed of several entities, three of which are companies. - The "main administrative office" is located in Switzerland, belonging to a company (Oak Philanthropy Limited) that is not registered in Switzerland, but - apparently - in Jersey.
Promoter/ founder	Alan M. PARKER
Background of its creation	Parker was a partner in DTS Group (<i>Duty Free Shopping</i>), a luxury travel retailer now owned by LVMH Moët Hennessy Louis Vuitton, with interests from this business. Parker founded the Oak Foundation ²³⁰

²²⁷ See information on the website <https://www.edi.admin.ch/edi/fr/home/fachstellen/eidgenoessische-stiftungsaufsicht/stiftungsverzeichnis.exturl.html/aHRocHM6Ly9lc3YuZGVpbW9zLmNoL3dlYi9SZXN1bHRz.html?freeText=Oak+Philanthropy+Limited&lang=fr&keyWord=-> (2.05.2023)

²²⁸ See information on the website <https://www.zefix.admin.ch/en/search/entity/list?mainSearch=Oak%20Philanthropy%20Limited> (fecha de consulta 1.3.2023; <https://www.ge.ch/recherche-entreprises-dans-registre-du-commerce-geneve> (2.05.2023))

²²⁹ See information found on the website of Jersey Financial Services Commission, <https://www.jerseyfsc.org/registry/registry-entities/?search=Oak%20Philanthropy&pagesize=100&previousNames=1> (4.08.2023)

²³⁰ See the website web <https://oakfnd.org/values-mission-history/> (4.08.2023)

II. Data on the entity

Board of Trustees²³¹ President	Natalie Shipton (Chair), Kristian Parker (Vice Chair), Caroline Turner (Vice Chair), Christopher Parker, Sebastian Turner, Benedikte Turner, Jette Parker and Alan Parker. Douglas Griffiths
Donors	n/a
Participation as donors in other entities	Seas at Risk Bloom Conservation International

III. SPHERES OF ACTION

They not only address environmental issues, but also have a much broader focus, currently covering 6 spheres of action:

- Environment: grants of USD 75.18 million were awarded in 2022²³²
- Prevention of child sexual abuse
- Housing and homelessness
- International human rights
- Issues affecting women
- Learning differences

B ECONOMIC & FINANCIAL SITUATION

Net income	n/a	
Net expenses	n/a	
Equity	n/a	

²³¹ See the website <https://oakfnd.org/values-mission-history/meet-our-leadership-team/#> (2.08.2023)

²³² See <https://oakfnd.org/programmes/environment/> (4.08.2023)

Public funds received	n/a	
Private funds received	n/a	
Grants awarded	Total grants awarded (2021)²³³ “Environment” Programme Specific grants: - Conservation International²³⁴ - Global Fishing Watch²³⁵ We should highlight the following grants awarded for the amount/1 year below - Swiss Philanthropy Foundation (grants to find solutions to "environmental challenges"²³⁶)	USD 338.89 million USD 54.64 million USD 600,000 (3 years) USD 900,000 (3 years) USD 6,144,498 (1 year)

²³³ Oak Foundation, *Annual Report 2021*, <https://oakfnd.org/wp-content/uploads/2022/02/Oak-Foundation-Annual-Report-2021.pdf> (1.08.2023), p. 6

²³⁴ Subsidised programme: “To create positive social and environmental outcomes by carrying out research on distant water fishing vessels in the eastern Pacific, the western central Pacific Ocean, and the Gulf of Guinea.” (Oak Foundation, *Annual Report 2021*, [...] op. cit, p. 19 (4.08.2023))

²³⁵ Subsidised programme: “Global Fishing Watch for its work to share data publicly, and for free, to promote international cooperation and enable a new era of ocean governance where transparency is the norm.” (Oak Foundation, *Annual Report 2021*, [...] op. cit, p. 19 (4.08.2023))

²³⁶ Oak Foundation, *Annual Report 2021*, [...] op. cit, p. 19 (4.08.2023)

C SPECIAL FEATURES of the entity

Founding entity of OCEANA International.

Its structure is not transparent.

OCEANA INTERNACIONAL

A SUMMARY OF THE ENTITY

I. Data on its creation²³⁷

Year	2001	
Country of registration	USA. "Section 501(c)(3)" charity	
Founding entities²³⁸	- The Pew Charitable Trusts - Oak Foundation - Marisla Foundation (formerly <i>The Homeland Foundation</i>) - Sandler Foundation - Rockefeller Brothers Fund	
Background of its creation²³⁹	It was established after a 1999 report commissioned by the founding entities concluded that less than 0.5% of all grants awarded by environmental NGOs in the US was spent on ocean advocacy and that none worked exclusively to protect and restore the oceans globally.	The Ocean Law Project (also launched by the Pew Charitable Trusts) was integrated into Oceana in 2001, and Oceana merged with the American Oceans Campaign (founded by actor and environmentalist Ted Danson).

II. Data on the entity

CEO	James F. Simon ²⁴⁰	Andrew Sharpless also led Oceana in the development and
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²³⁷ See the website <https://oceana.org/about/> (4.08.2023)

²³⁸ See the website web <https://oceana.org/foundation-donors/> (4.08.2023)

²³⁹ See the website web <https://oceana.org/about/> (4.08.2023)

²⁴⁰ See the website web <https://oceana.org/people-partners/jim-simon/> (03.12.2024)

		launch of Global Fishing Watch (he serves on the Board of Directors)
It receives contributions from...	> USD 500,000²⁴¹ - Adessium Foundation - Arcadia - Becht Foundation - Bloomberg Philanthropies - Nationale Postcode Loterij - Gordon and Betty Moore Foundation - Leonardo DiCaprio Foundation - Marisla Foundation - The Nikita Foundation - Oak Foundation - Oceans 5 - Pacific Life Foundation - Paul M. Angell Family Foundation - Robertson Foundation - Rockefeller Brothers Fund - Sandler Foundation - David & Lucile Packard Foundation - Svenska Postkod Lotteriet - The Tiffany & Co. Foundation - Waitt Foundation - Walton Family Foundation - Waterloo Foundation - The Wyss Foundation	
Partners	Collaboration with companies²⁴²: - 1% for the planet - Anker - Biossance - Blancpain - conscious step - dropps - Gray Whale Gin - Index IQ - Knockaround	

²⁴¹ See the website <https://oceana.org/foundation-donors/> (4.08.2023)

²⁴² See the website <https://oceana.org/corporate-partnership/> (4.08.2023)

	- LARQ - Lokai - Moroccanoil - Naturesage - Nautica - Starborough - The Sak - Ubisoft Future Games of London - Vitamin A - Warner Bros. Discovery
Participation in alliances/networks	DEEP SEA CONSERVATION COALITION Seas at Risk
Participation as a donor in other entities	It contributes to: Oceana Europa

III. SPHERES OF ACTION²⁴³

It is dedicated exclusively to the protection and restoration of oceans on a global scale.

Its vision is to restore the richness, health and abundance of the oceans as they once were.

It is the largest international organisation promoting ocean conservation.

B ECONOMIC & FINANCIAL SITUATION

Total net income and contributions (2021)	USD 39.512 million, of which USD 27.8 million were grants and contributions ²⁴⁴ :	The Audit Report notes a "concentration of risk" because approximately 13 million, or 1/3 of the
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²⁴³ See the website <https://oceana.org/what-we-do/> (4.08.2023)

²⁴⁴ OCEANA, *Annual Report 2021-2022*, https://oceana.org/wp-content/uploads/sites/18/Annual-Report-2022_For-Web_RS.pdf?_ga=2.227479709.1456277773.1673978669-788031707.1672660861 (4.08.2023), p. 65

	- 10.3 million without donor restrictions - 17.4 million with donor restrictions	total income, <u>came from only 4 donors</u> - without specifying who they are. ²⁴⁵
Total net expenses (2021)	USD 39.637 million ↳ of which 14.72 million was for "international activities" ²⁴⁶	
Equity (2021)	USD 63.312 million ²⁴⁷	
Public funds		
• Yes/No	n/a	
Private funds	Undisclosed	

C SPECIAL FEATURES of the Entity

It has regional organisations:

[United States](#), [Europe](#), [Chile](#), [Canada](#), [Belize](#), [Philippines](#), [Brazil](#), [Peru](#), [Mexico](#), UK

²⁴⁵ OCEANA, *Consolidated Financial Statements, For the Year Ended December 31, 2021 and Report Thereon*, <https://oceana.org/wp-content/uploads/sites/18/Oceana-2021-12-AUDIT-Final-FS.pdf> (4.08.2023), p. 15

²⁴⁶ OCEANA, *Annual Report 2021-2022*, [...] op. cit, p. 65

²⁴⁷ Ibidem

OCEANKIND

A SUMMARY OF THE ENTITY

I. Data on its creation²⁴⁸

Year	2018	
Country of registration	USA, LLC	According to online sources, this is an LLC company (<i>limited liability company</i>) ²⁴⁹
Founder	Lucy SOUTHWORTH	Wife of Google co-founder Larry Page
Background of its creation	According to the organisation itself, it was created to support strategic organisations, exceptional leaders and promising initiatives.	

II. Data on the entity

Executive Director	Matt ELLIOTT ²⁵⁰
Donors	n/a

²⁴⁸ See the website <https://oceankind.org/people/> (4.08.2023)

²⁴⁹ See HARRIS, M. (2022), "Inside the secretive Silicon Valley startup trying to save the oceans with tech", TechCrunch 2.5.2022, https://techcrunch.com/2022/05/02/inside-the-secretive-silicon-valley-startup-trying-to-save-the-oceans-with-tech/?guccounter=1&guce_referrer=aHRocHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAALV3nb7rrUQsJSRoiC8HK4J6jtoMMDFcZOz71WPnxkJbx96-cNTocNRaRt-Y7625ukWJIh5vOyBUmq6alr4svTJSEBD2KFpP3F56MYtywwHo8tWz1L3268bWwL8J6TzEJdqBHpdQCK6bb2Q_ILUVu3KbUN8pfZOxNM8MEcDWz-B- (4.08.2023)

²⁵⁰ See the website <https://oceankind.org/people/> (4.08.2023)

Partners	n/a
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III. SPHERES OF ACTION

It is dedicated to improving the health of global ocean ecosystems and the livelihoods of the people who rely on them.

Primarily, it provides grants to projects related to marine science, technology, wildlife and climate.²⁵¹

B ECONOMIC & FINANCIAL SITUATION

Total income	n/a	
Operating expenses	n/a	
Equity	n/a	
Public funds	-	
Private funds	yes	
• Sources	Presumably from the Southworth/ Page family estate (Google)	
Grants awarded to²⁵²	Among others... CONSERVATION INTERNATIONAL	

²⁵¹ HARRIS, M. (2022), “Inside the secretive Silicon Valley startup trying to save the oceans with tech”, TechCrunch 2.5.2022, https://techcrunch.com/2022/05/02/inside-the-secretive-silicon-valley-startup-trying-to-save-the-oceans-with-tech/?guccounter=1&guce_referrer=aHRocHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAALV3nb7rrUQsJSRoiC8HK4J6jtoMMDFcZOz71WPnxkJbx96-cNTocNRaRt-Y7625ukWJIh5vOyBUmq6alr4svTJSEBD2KFpP3F56MYtywwHo8tWz1L3268bWwL8J6TzEJdqBHpDQck6bb2Q_ILUVu3KbUN8pfZOxNM8MEcDWz-B- (fecha de consulta 2.5.2023)

²⁵² See the database of Oceankind, <https://oceankind.org/awarded-grants/> (consulted on 2.5.2023)

	- USD1.799 million (34 months)	2020
	- USD 75,000 (9 months)	2019
	ENVIRONMENTAL JUSTICE FOUNDATION	
	- USD 3.9 million (36 months)	2020
	GLOBAL FISHING WATCH	
	- USD 900,000 (36 months)	2021
	- USD 121,000 (6 months)	2021
	- USD 6,000,000 (36 months)	2020
	- USD 48,900 (3 months)	2019
	CLIMATEWORKS FOUNDATION to multiple multi-year programmes totaling:	
	- USD 7.9 million	2021
	- USD 10.3 million	2020
	OCEANA	
	- USD 400,000 (12 months)	2022
	- USD 1.6 million (35 months)	2020
	OCEAN CONSERVANCY	
	- USD 400,000 (17 months)	2021
	- USD 6 million (36 months)	2020
	OCEANS 5	
	- 5.165 million (36 months)	2022
	- 3.75 million (33 months)	2020

C SPECIAL FEATURES of the entity

It is a company - its income/ assets are unknown, but it is transparent about the grants awarded.

It is noteworthy that it was mentioned by Oceans 5's Executive Director, J. Charles Fox, at the United Nations Ocean Conference, along with other large and powerful entities such as the Oak Foundation, the Walton Foundation, Marisla, etc.:

“A relatively small number of institutions are responsible for the majority of ocean giving. Groups like the David and Lucile Packard Foundation, Oak Foundation, Walton Foundation, Gordon and Betty Moore Foundation, Marisla Foundation and Bloomberg Philanthropies are dominant institutions. New entrants include groups like Oceankind and the Bezos Earth Fund.” (Remarks of J. Charles Fox, Executive Director, Oceans 5 July 1, 2022 United Nations Ocean Conference, Interactive Dialogue #8 Interlinkages Between SDG 14 and Other Goals²⁵³

²⁵³ See https://sdgs.un.org/sites/default/files/2022-07/Oceans_5%28E%29_o.pdf, (consulted on 2.5.2023)

OCEANS 5

A SUMMARY OF THE ENTITY

I. Data on its creation

Year	2011
Country of registration	Not registered as an independent organisation - it is a "coalition" ²⁵⁴
Pomoters	4 entities: ²⁵⁵ - Oak Foundation - Bloomberg Family Foundation - Marisla Foundation - Wyss Foundation
Background of its creation	Oceans 5 is a collaborative (an organised collective effort) managed by <i>Rockefeller Philanthropy Advisors</i> , which acts as the fiscal sponsor and neutral venue. ²⁵⁶

II. Data on the entity

Executive Director	J. Charles FOX
Donors	n/a

²⁵⁴ See the website <https://www.rockpa.org/philanthropist/oceans-5/> (4.08.2023)

²⁵⁵ See the website <https://www.influencewatch.org/non-profit/oceans-5/> (fecha de consulta 2.5.2023)

²⁵⁶ See the website <https://www.rockpa.org/philanthropist/oceans-5/> (4.08.2023)

Partners and Members²⁵⁷	- Adessium Foundation - Arcadia - Bloomberg Philanthropies - Builders Initiative - Coleman Family Ventures - Marisla Foundation - Moore Charitable Foundation - Oak Foundation - Oceankind - The David & Lucile Packard Foundation - Paul G. Allen Family Foundation - Paul M. Angell Family Foundation - Planet Heritage Foundation, Inc. - Sobrato - The Tiffany & Co. Foundation - vere - Waitt Foundation - The Waterloo Foundation - Zegar Family Foundation
Participation in alliances/networks	Deep Sea Conservation Coalition

III. SPHERES OF ACTION

It focuses primarily on the following 3 spheres²⁵⁸:

- Overexploitation of fishery resources
- Creation of MPAs
- Limit offshore oil and gas exploitation

B ECONOMIC & FINANCIAL SITUATION

Total income	n/a	
Operating expenses	n/a	

²⁵⁷ See the website <https://www.oceans5.org/who-we-are/> (4.08.2023)

²⁵⁸ See the website <https://www.oceans5.org/> (4.08.2023)

Equity	n/a	
Public funds	n/a	
Private funds	n/a	
Grants awarded to²⁵⁹	BLOOM (USD 47,000) for “Truly Protected Areas in France”, 5 months BLOOM (USD 628,000) for “Protected Areas in France”, 3 years OCEANA INTERNATIONAL (USD 1,200,000) for “Global Transparency Coalition”, 3 years OUR FISH (USD 360,000) for “Ending Overfishing is Climate Action”, 17 months SEAS AT RISK (USD 1,600,000) for “Future of European Fisheries”, 3 years GLOBAL FISHING WATCH (€1,500,000) for “Fisheries Transparency in the Mediterranean”, 3 years PEW Charitable Trusts (USD1,500,000) for “Improving Transparency and Accountability at	2022 2022 2022 2022 2022 2022 2021

²⁵⁹

See Oceans 5, *Grant Database*, <https://www.oceans5.org/grants/> (4.08.2023)

	RFMOs", 3 years	
	The EU IUU Fishing Coalition - EJF, The Nature Conservancy, Pew, WWF (€900,000) for "Removing Barriers to Effective Fisheries Transparency in the EU and Beyond", 3 years	2021
	SEAS AT RISK (€1,000,000) for "Turning the Tide for EU fisheries", 2 years	2020
	DEEP SEA CONSERVATION COALITION (€1,500,000), n/a	2020

C SPECIAL FEATURES of the entity

It is not registered as an independent organisation - it is a "coalition." This may be why further information on income, expenses and assets is not available.

DAVID AND LUCILE PACKARD FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation²⁶⁰

Year	1964	
Country of registration	USA. "Section 501(c)(3)" charity	
Founders	David and Lucile PACKARD	Founder of the technology company Hewlett-Packard
Background of its creation	In 1996, when David Packard passed away, he left a significant portion of his HP stock to the foundation.	<i>Monterey Bay Aquarium Research Institute</i> is an affiliated entity

II. Data on the entity²⁶¹

President and CEO	Nancy LINDBORG	She comes from USAID and USIP
Director in the office of the President	Anna ARCHER	She was at the Monterey Bay Aquarium for >10 years
Ocean Director	Meg CALDWELL	
Managing Director	Stephen BLUESTEIN	

²⁶⁰ See the website <https://www.packard.org/about-the-foundation/our-history/> (4.08.2023)

²⁶¹ See the website <https://www.packard.org/about-the-foundation/our-people/> (4.08.2023)

III. SPHERES OF ACTION

It has 3 priorities²⁶²:

- Build more just societies
- Protect and restore nature
- Invest in families and communities

The focus of its activities is (only those related to the oceans are mentioned here): conservation and "scienceclimate," ensuring a better future for the oceans.

B ECONOMIC & FINANCIAL SITUATION

Total income (2021) ²⁶³	USD 743.039 million
Operating expenses (2021)	USD 513.754 million
Total liabilities and equity (2021)	USD 9,043 million (<i>USD 9,043,451.760</i>)
Public funds	no
Grants awarded to	Among others (2021) ²⁶⁴ : OCEANA International: USD 215,000 GLOBAL FISHING WATCH: USD 50,000

C SPECIAL FEATURES of the entity

It is a member or collaborator of OCEANS 5.

²⁶² See the website <https://www.packard.org/approach/> (03.12.2024)

²⁶³ The David and Lucile Packard Foundation, *Form 990-PF*, https://www.packard.org/wp-content/uploads/2022/12/2021_Packard-Foundation_990-PF_Public-Disclosure.pdf, (4.08.2023), pp. 2-3

²⁶⁴ The David and Lucile Packard Foundation, *Form 990-PF*, https://www.packard.org/wp-content/uploads/2022/12/2021_Packard-Foundation_990-PF_Public-Disclosure.pdf, (4.08.2023), Todas las concesiones están publicadas en este informe.

SANDLER FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation²⁶⁵

Year	1991
Country of registration	USA. "Section 501(c)(3)" charity
Founding Entities	Herb & Marion SANDLER
Background of its creation	They both managed Golden West Financial Corporation

II. Data on the entity

President	Steve DAETZ ²⁶⁶
Participation as donors in other entities	Founding Entity of OCEANA INTERNATIONAL

III. SPHERES OF ACTION

Various shperes, such as:²⁶⁷

- Help to launch new nonprofit organisations
- Support NGOs to catalyse their expansion goals
- Financial support to nonprofit organisations

²⁶⁵ See the website <https://www.sandlerfoundation.org/> (4.08.2023)

²⁶⁶ See information found at <https://www.linkedin.com/in/steve-daetz-15613411> (fecha de consulta 2.5.2023)

²⁶⁷ See the website <https://www.sandlerfoundation.org/grants/> (4.08.2023)

B ECONOMIC & FINANCIAL SITUATION

Total income²⁶⁸	USD 253.17 million	2019
Operating expenses	USD 88.2 million	2019
Equity (6.2022)	USD 826.75 million	2019
Public funds	-	
Private funds	Yes, from themselves	
Grants awarded to	As of the end of 2022, the foundation awarded grants of (cumulatively since its inception) USD 1.200 million²⁶⁹ It has provided support (financial and other) to catalyse its expansion and/or enhance operational capacity: OCEANA²⁷⁰	

C SPECIAL FEATURES of the Entity

It was a founding entity of OCEANA INTERNATIONAL.

²⁶⁸ See the information on Form 990 PF, https://projects.propublica.org/nonprofits/display_990/943147856/05_2021_prefixes_94-95%2F943147856_202006_990_2021052018154785 (4.08.2023)

²⁶⁹ See the website <https://www.sandlerfoundation.org/> (4.08.2023)

²⁷⁰ See the website <https://www.sandlerfoundation.org/grants/> (4.08.2023)

SEAS AT RISK

A SUMMARY OF THE ENTITY

I. Data on its creation²⁷¹

Year	2006	
Country of registration	Belgium  Source: Seas at Risk Annual Report 2021, https://seas-at-risk.org/wp-content/uploads/2022/07/ANNUAL-REPORT-DESIGN-FINAL.pdf, p. 21 (4.08.2023)	ASBL Organisation (non-profit), No. BE 0884.771.444 It functions as an umbrella organisation for several NGOs.
Founding Entities	Information not found	

²⁷¹

See the website <https://www.companyweb.be/fr/0884771444/seas-at-risk> (4.08.2023)

Background of its creation	-	

II. Data on the entity

Executive Director²⁷²	Monica VERBEEK
Donors (2021)²⁷³	- 10% for the Ocean²⁷⁴ - Adessium Foundation - Andreas Ruehl Foundation - ClimateWorks Foundation - European Commission (public) - Deep Sea Conservation Coalition - Gordon and Betty Moore Foundation - Levine Family Foundation - Oak Foundation - OceanCare - Oceans 5 - Pisces Foundation - Umwelt Bundesamt (public) - The Waterloo Foundation - Zero Waste Europe
Participation in alliances/networks	Deep Sea Conservation Coalition

III. SPHERES OF ACTION

It has 4 main spheres of action²⁷⁵:

- Climate and Ocean: decarbonisation of maritime transport, marine renewable energy

²⁷² See the website <https://seas-at-risk.org/our-team/> (4.08.2023)

²⁷³ Seas at Risk, *Annual Report 2021*, <https://seas-at-risk.org/wp-content/uploads/2022/07/ANNUAL-REPORT-DESIGN-FINAL.pdf> (4.08.2023), p. 23

²⁷⁴ See the website <https://www.10percentfortheocean.org/> (4.08.2023). 10 percent for the ocean (CIO, Charitable Incorporated Organisation, UK), founded by Arksen (is a marine adventure company. We build exceptionally capable vessels) and Vala Capital (valacap.com)

²⁷⁵ See the website <https://seas-at-risk.org/what-we-do/> (4.08.2023)

- Restore the ocean: MPAs, ocean management
- Clean ocean: ocean plastic pollution
- Use of the ocean: low-impact fishing, responsible aquaculture, saving deep sea from marine mining

B ECONOMIC & FINANCIAL SITUATION

Total income (2021)²⁷⁶	€2,008,292
Total expenses (2021)	€2,004,693
Equity (6.2022)	n/a
Public funds	yes
• Source	European Commission (see below)
Funds (% of total income, information provided by Seas at Risk)²⁷⁷	- Oceans 5 (35%) - European Commission (20%) - Gordon and Betty Moore Foundation (12%) - Adessium (7%) - Oak Foundation (5%) - ClimateWorks Foundation (4%) - Waterloo Foundation (3%) - Zero Waste Europe (3%) - <i>Others</i> (13%)

²⁷⁶ Seas at Risk, *Annual Report 2021*, <https://seas-at-risk.org/wp-content/uploads/2022/07/ANNUAL-REPORT-DESIGN-FINAL.pdf> (consulted on 2.5.2023), p. 24

²⁷⁷ Ibidem

- The data published in the European Union Transparency Register do not match the data in the report because the following data appear for the financial year ended (01/2021 - 12/2021)²⁷⁸:

Inicio Acerca del Registro Más información Inscripción o renovación Condicionalidad y otras medidas de transparencia Denuncias Acreditación PE Contacto		
Intereses registrados		
El solicitante/declarante: no representa intereses comerciales		
Datos financieros		
Ejercicio financiero cerrado: 01/2021 - 12/2021		
Fuentes de financiación: Subvenciones		
Contribuciones en el ejercicio financiero cerrado (por encima de 10 000 euros y del 10 % del presupuesto total):	Nombre del contribuidor	Importe
	Rockefeller Philanthropy Advisor	359.286
	Adessium	96.416
	Climate work foundation	86.402
	The Nature Conservancy	25.400
	Waterloo	65.092
	Levine Family Foundation	13.802
	Stichting Deep Sea Conservation Coalition	30.000
	Zero Waste Europe	59.102
Presupuesto total:		1.135.500 €

The contribution from "Rockefeller Philanthropy Advisor" is not mentioned in the annual report.

register/public/consultation/displaylobbyist.do?id=625261439488-38

Inicio Acerca del Registro Más información Inscripción o renovación Condicionalidad y otras medidas de transparencia Denuncias Acreditación PE Contacto		
Intereses registrados		
El solicitante/declarante: no representa intereses comerciales		
Datos financieros		
Ejercicio financiero cerrado: 01/2021 - 12/2021		
Fuentes de financiación: Subvenciones		
Contribuciones en el ejercicio financiero cerrado (por encima de 10 000 euros y del 10 % del presupuesto total):	Nombre del contribuidor	Importe
	Rockefeller Philanthropy Advisor	359.286
	Adessium	96.416
	Climate work foundation	86.402
	The Nature Conservancy	25.400
	Waterloo	65.092
	Levine Family Foundation	13.802
	Stichting Deep Sea Conservation Coalition	30.000
	Zero Waste Europe	59.102
Presupuesto total:		1.135.500 €
Información complementaria para un presupuesto de 0 euros: N/A		
Subvenciones en el ejercicio financiero cerrado:	Fuente	Importe
	European Commission - EASME	400.000
Importe total de las subvenciones de la UE:		400.000 €
Subvenciones en el ejercicio financiero en curso:	Fuente	Importe
	European Commission - CINEA	550.000
Importe total de las subvenciones de la UE:		550.000 €
Información complementaria: N/A		

²⁷⁸ European Union Register, Seas at Risk, https://transparency-register.europa.eu/searchregister-or-update/organisation-detail_es?id=625261439488-38 (12.11.2024)

Furthermore, the Register mentions 2 European Union grants in amounts of €400,000 and €550,000, respectively. One explanation may be that they were awarded in previous years and were not "counted" in 2021.

C SPECIAL FEATURES of the Entity

It has EU funding sources, and the largest contribution of private funds came from Oceans 5 in 2021.

SHARKPROJECT

A SUMMARY OF THE ENTITY

I. Data on its creation²⁷⁹

Year	2002 (primero se fundó Sharkproject Alemania)
Country of registration	Switzerland
Founding entities	Its initiator was Erich Ritter (zoologist and shark researcher)
Background of its creation	Shark Project International is an umbrella organisation for other national organisations established in Germany, Austria and Switzerland..

II. Data on the entity²⁸⁰

President Sharkproject International	Alex SMOLINSKY
Donors	Sponsors are listed on the website, but some people wish to remain anonymous. ²⁸¹ They appear to be companies or associations.
Participation in networks/ coalitions	Deep Sea Conservation Coalition Seas at Risks

²⁷⁹ See the website <https://www.sharkproject.org/sharkproject/international/organisation-international/> y <https://www.sharkproject.org/sharkproject/international/historie/> (4.08.2023)

²⁸⁰ See the website <https://www.sharkproject.org/sharkproject/team/> (4.08.2023)

²⁸¹ See the website <https://www.sharkproject.org/partner/sponsoren/> (4.08.2023)

III. SPHERES OF ACTION

Protect sharks and their habitats.

B ECONOMIC & FINANCIAL SITUATION

The 3 national entities have their own accounts.

Income	€23,311 └ €14,627 from donations	Austria ²⁸²
	Information not found	Germany, Switzerland
Expenses	€23,311	Austria
	Information not found	Germany, Switzerland
Equity	-	
Public funds	Yes (€7,227), source not disclosed	Austria
	Information not found	Germany, Switzerland
Private funds	n/a	

C SPECIAL FEATURES of the Entity

It is made up of entities from three states, two of which are non-coastal.

²⁸² See Shark Project Austria, *Jahresbericht 2021*, p. 9
<https://www.sharkproject.org/sharkproject/austria/> (4.08.2023)

THE ROCKEFELLER BROTHERS FUND

A SUMMARY OF THE ENTITY

I. Data on its creation²⁸³

Year	1940
Country of registration	USA, "Section 501(c)(3)" charity
Founding Entities	Foundations created by the Rockefeller Jr. heirs
Background of its creation	It was founded by 5 of John D. Rockefeller Jr.'s sons, magnates

II. Data on the entity

Chairman of the Board	Joseph PIERSON
Donors	-

III. SPHERES OF ACTION

According to the information provided on the website, the RBF awards grants to projects in 4 spheres²⁸⁴:

- Democratic Practice
- Sustainable Development
- Peacebuilding
- *Culpeper* Arts and Culture

²⁸³ See the website <https://www.rbf.org/about/about-us> (4.08.2023)

²⁸⁴ See the website <https://www.rbf.org/grants/for-grant-seekers> (4.08.2023)

B ECONOMIC & FINANCIAL SITUATION

Total income ²⁸⁵	USD 26.314 million	2019
Total expenses	USD 64.387 million	2019
Equity	USD 1,296.117 million	2019
Public funds	-	
Private funds	-	
Grants awarded to ²⁸⁶	In 2022, RBF awarded 433 grants for a total of USD 67.8 million	

C SPECIAL FEATURES of the entity

Founding entity of OCEANA INTERNATIONAL

²⁸⁵ See *Form 990* for 2020 on the website https://projects.propublica.org/nonprofits/display_990/131760106/02_2021_prefixes_11-13%2F131760106_201912_990PF_2021022617759457 (4.08.2023)

²⁸⁶ See the website <https://www.rbf.org/grants-search> (consulted on 2.05.2023)

WALTON FAMILY FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation²⁸⁷

Year	1987	
Country of registration	USA	"Section 501(c)(3)" charity
Founders	Sam & Helen WALMART	
Background of its creation	They were the owners of the retailer Wal-Mart	It is not identical to the "Walmart Foundation," which is controlled by Wal-Mart Inc.

II. Data on the entity

Chair of the Board	Annie PROIETTI ²⁸⁸
Donors	Under the direct control of the Walmart Family ²⁸⁹

III. SPHERES OF ACTION²⁹⁰

It is primarily dedicated to 3 spheres:

- Elementary and secondary education

²⁸⁷ See the website <https://www.waltonfamilyfoundation.org/about-us/our-history> (4.08.2023)

²⁸⁸ See the website <https://www.waltonfamilyfoundation.org/about-us/board-of-directors> (4.08.2023)

²⁸⁹ See the website <https://www.waltonfamilyfoundation.org/about-us/our-history> (4.08.2023)

²⁹⁰ See the website <https://www.waltonfamilyfoundation.org/our-work> (4.08.2023)

- Protect rivers and oceans, and their communities
- Invest in its region, locally

B ECONOMIC & FINANCIAL SITUATION

Total income (2021)²⁹¹	USD 1,484 million (<i>USD 1,484,598.263</i>)
Total expenses (2021)	USD 789.9 million
Expenses on grants (2021)	USD 709.4 million ²⁹² - Environment: USD 100.2 million
Total liabilities and equity (2021)	USD 4.888 million (<i>4,888,585.153 USD</i>)
Public funds	-
Grants awarded to	ALL GRANTS AWARDED are PUBLISHED at https://www.waltonfamilyfoundation.org/grants-database?f0=00000169-91e5-d2a9-a7eb-bffd48390000&p=2 (4.08.2023) As examples... ENVIRONMENTAL JUSTICE FOUNDATION: - USD 328,000 (combat IUU fisheries, 2021) CONSERVATION INTERNATIONAL (<i>see IC sheet</i>) MARINE STEWARDSHIP COUNCIL - USD 1,050,000 (support to Ocean Sustainability Fund)

²⁹¹ TAX RETURNS (FORM 990) CAN BE FOUND on the website: Walton Family Foundation, *About Us – Reports & Financials*, FORM 990 2021, <https://www.waltonfamilyfoundation.org/about-us/reports-financials> (4.08.2023)

²⁹² Ibidem

	GLOBAL TUNA ALLIANCE. A grant from the Walton Family Foundation for 3 years, but the amount is not indicated - the wording could lead to the conclusion that it ensures its operation for 3 years (“(...) in 2021 we secured 3-year funding from the Walton Family Foundation. This funding allows the GTA to further build our foundation in these early years.” (See Global Tuna Alliance 2021 Annual Report, February 2022, https://www.globaltunaalliance.com/wp-content/uploads/2022/10/2021-Annual-Report.pdf, p. 6)
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C SPECIAL FEATURES of the Entity

High degree of transparency.

THE WATERLOO FOUNDATION

A SUMMARY OF THE ENTITY

I. Data on its creation²⁹³

Year	2007	
Country of registration	United Kingdom	<i>Charity Commission for England and Wales (No. 1117535)</i>
Founders	Heather STEVENS David STEVENS	
Background of its creation	They were part of the founding of the "Admiral" insurance group. To establish the foundation, H. and D. Stevens donated shares in Admiral Group plc worth (then) £99 million to constitute the Foundation's endowment fund.	

II. Data on the entity²⁹⁴

Operations Manager	Hannah TAYLER
Trustees	Professor H. V. Stevens Mr D. G. Stevens Mrs C.A. Oakes

²⁹³ See the website <http://www.waterloofoundation.org.uk/History.html> (4.08.2023)

²⁹⁴ See the website <http://www.waterloofoundation.org.uk/AboutUs.html> (consulted on 2.5.2023)

Participation in alliances/networks

Seas at Risk

Deep Sea Conservation Coalition

III. SPHERES OF ACTION²⁹⁵

It has several lines of action: global development, child development, projects in Wales (UK) and the environment. The environmental grant programme aims to mitigate the negative effects that people have on the environment. It has two programmes:

- "Marine". It provides grants to projects that contribute to stopping the decline of fish stocks
- "Tropical Rainforests"

B ECONOMIC & FINANCIAL SITUATION

Total income

"Our investment income is derived from share dividends, interest earned on bonds and other securities and bank interest. The Foundation's biggest asset continues to be a significant shareholding in Admiral Group plc, a UK-listed company. In addition, the Foundation has a diversified equity and bond portfolio managed by our investment managers, Whitley Asset Management. Summary of Reserves At the year-end unrestricted **reserves were £246,373,827** (2020: £216,954,652)"²⁹⁶

The trustees made the following contributions to the foundation²⁹⁷:

²⁹⁵ See the website <http://www.waterloofoundation.org.uk/> (4.08.2023)

²⁹⁶ The Waterloo Foundation, *Financial Statements 31 December 2021*, https://register-of-charities.charitycommission.gov.uk/charity-search?p_p_id=uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet&p_p_lifecycle=2&p_p_state=maximized&p_p_mode=view&p_p_resource_id=%2Faccounts-resource&p_p_cacheability=cacheLevelPage&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_objectiveId=A12340773&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_mvcRenderCommandName=%2Faccounts-and-annual-returns&_uk_gov_ccew_onereg_charitydetails_web_portlet_CharityDetailsPortlet_priv_r_p_organisationNumber=4028736 (4.08.2023), p. 21

²⁹⁷ The Waterloo Foundation, *Financial Statements 31 December 2021*, [...] op. cit, pp. 23-24

	2013 6,499,800 2014 3,002,500 2015 2,984,480 2016 4,030,300 2017 3,849,900 2018 4,272,200 2019 4,296,800 2020 12,256,500 2021 6,043,400	
Grants awarded (2021)²⁹⁸	£11,710,597 L £3,150,240	Total Environment programme
Equity	n/a	
Public funds	no	
Grants awarded to	Grants awarded for the "Marine" programme ²⁹⁹ : - total of £1,000,439 - 10 grants - average amount of £100,044 Examples: Our Fish, Global Fishing Watch, etc.	

C SPECIAL FEATURES of the Entity

It supports Seas at Risk and is part of the Deep Sea Conservation Coalition

²⁹⁸ The Waterloo Foundation, *Financial Statements 31 December 2021*, [...] op. cit, p. 3

²⁹⁹ The Waterloo Foundation, *Financial Statements 31 December 2021*, [...] op. cit, p. 9

NGO TUNA FORUM

Its objective is to align and make a coordinated and collaborative effort to identify priorities and provide advice to RFMOs; it seeks positions, requests and collective actions (See <https://ngotunaforum.org/about/>)

It does not provide information on financial resources or the structure of the organisation.

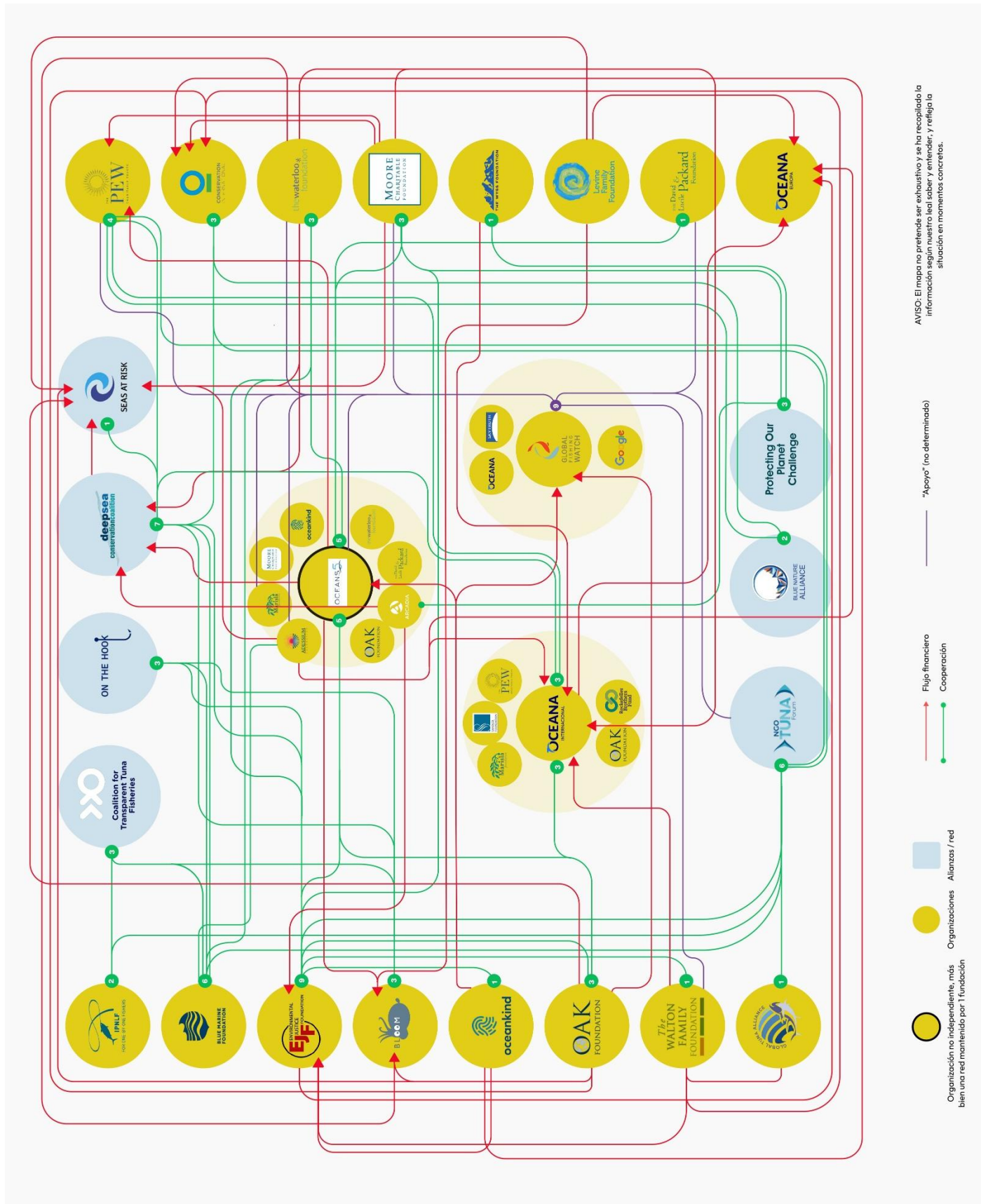
Participating organisations³⁰⁰

- BirdLife International
- Blue Marine Foundation
- Conservation International
- Arthworm
- Ecology Action Centre
- Environmental Defense Centre
- Environmental Justice Foundation
- Fair Trade USA
- FishChoice
- FishWise
- Global Fishing Watch
- Global Tuna Alliance
- Greenovation:Hub
- Greenpeace
- International Pole & Line Foundation
- International Seafood Sustainability Foundation
- MSC
- Monterey Bay Aquarium
- The Nature Conservancy
- The Ocean Foundation
- Ocean Outcomes
- OceansAsia
- Olive Ridley Project
- Pew
- MCS
- The Safina Center
- Seafood Legacy
- Shark Advocates International
- SharkProject
- Sustainable Fisheries Partnership

³⁰⁰ See the website <https://ngotunaforum.org/participating-organizations/> (4.08.2023)

- Wild Ocenas
- WWF

PARTE D – MAPA



AVISO: El mapa no pretende ser exhaustivo y se ha recopilado la información según nuestro leer saber y entender, y refleja la situación en momentos concretos.

CONCLUSIONS

- GOVERNANCE AND FUNDING

To begin, it should be remembered that **IGs are actors in society whose objective is to influence politics to achieve a favourable outcome for their group or the cause they represent**. It is important to observe the composition of IGs, as this may determine a lack of representation of certain actors or sectors or imply biases in decision-making. All IGs have a governance system freely chosen by their founders or by legal requirements, so decision-making can be more or less direct or participatory and timely regarding certain issues. This is relevant because the **blue IGs with influence in the European Union address fisheries management issues in a broad sense**.

The **IGs analysed show limited transparency in their operations**. The origin and formation of business IGs are usually business associations, whose objective is clear: to protect their activity and make it sustainable while maintaining a balance between the economic, social and environmental dimensions.

This limited transparency is even more noticeable in NGOs, because the close collaborations between many of them make an overview of their funding and objectives even more complex. The most controversial issue, if possible, is funding, especially how it influences dependence on **specific donors, who are usually unknown to society**, even, as shown in the report, in the case of donor-advised funds, which leaves it up to the donor to determine their identity.

For years, international and European standards and procedures have been established to ensure the traceability of fishery products, which are mandatory for all those involved throughout the value chain. International organisations, such as the FAO, continue to promote the implementation of traceability in all regions of the world, an important development because the fishery production chain is particularly long and internationalized. Traceability not only increases the quality and safety of products but also aims to ensure sustainability in every sense. Closely linked to traceability is transparency, since end consumers have information about the origin of the raw material and its processing. In relation to the topic addressed in this report, transparency must also increase regarding the financing of IGs and the interests they represent. A similar "traceability" should also be required to all IGs, as they have requested and acted as pressure groups in demanding improved and guaranteed traceability of the sector's

products. **The organisational and financial traceability of IGs is key to the transparency of their participation in national and international public policy.**

The **funding sources for conservationist IGs are more diverse than those for business IGs**, which are primarily funded by their members - associations - and by public funds. In addition to the source, the question of the purpose of the funding arises. In the case of conservationist IGs, we find the case of donor-restricted funds, through which a donation can be made without specific indication of its purpose, and the donation can be even directed to another organisation. This is linked to the possible personal motivations of the founders and donors, a truly controversial issue that, of course, is not public and goes beyond obtaining tax benefits.

Thus, we find, for example, NGOs whose founders are oil magnates, commodity magnates or leading technology companies, companies related to markets, capital funds, and even media outlets. It should be noted that many of the aforementioned industries have a serious impact on the environment. **It is not possible to speculate on their motivation for founding or participating with large donations in one or more NGOs, but it is clear that their interests go beyond tax deductions and the desire to collaborate in safeguarding the environment of seas and oceans.** These types of businesses of the founders have a special connection with the resources available in seas and oceans, either through marine mining aimed at obtaining manganese nodules, rocks rich in copper, nickel or cobalt - such as those found in the Clarion-Clipperton Zone in the Pacific region between Hawaii and Mexico - which are necessary materials for the manufacture of engines, batteries, panels or turbines, or through new marine renewable energies to maintain their status in the energy industry in these times of energy transition, among other activities such as underwater telecommunications, monitoring the environmental impact of marine activities.

Therefore, **this situation could lead to the perception of a conflict of interest between their roles in the NGO and their commercial activities or other personal interests**, an issue that could be subject to criticism.

One fact we cannot ignore is that in many countries, donations provide a tax benefit for donors, a particularly lucrative situation for large companies, which obtain this economic benefit while also achieving a better public image. The creation of foundations or NGOs by magnates is well known, but as can be seen in the **map in section D of this report, funding flows between them** in such a way that it becomes **impossible to**

control how the money ends up being allocated and invested. Therefore, tax engineering is implemented to ensure that NGO funding complies with the law and, in turn, always allows for tax benefits by diverting funds from one to another until the money ends up being invested in the specific objective desired by the donor.

- OBJECTIVES and INTERESTS REPRESENTED

Regarding the operations carried out by IGs, we must emphasise that the **creation and objectives of business IGs** are clear, as they **defend the business interests of their constituents. Conservationist IGs focus their activities on broader and even universal tasks**, such as a commitment to saving the seas and oceans. Many of them even demonstrate bias in their operations, stemming from political and activist agendas.

IGs attempt to connect and coordinate with other IGs, but this is often not possible, resulting in overlapping actions or ineffectiveness due to a lack of cooperation. This is related to the actual impact capacity of each IG, especially in the sector at hand due to its complexity and magnitude.

The various IGs have a role in raising awareness about how to achieve their goals, although NGOs have long invested much of their funds in campaigns to convey their point of view to the public, which may not always be the correct one. Consider the entire **movement in favour of sustainability, which has permeated society without conveying its true definition.** This is a very important issue, as it consists of three dimensions: the widely known environmental dimension, the social dimension and the economic dimension, which are largely forgotten.

Research and development carried out by IGs should be further promoted, as they are often **responsible for preparing or collecting the reports or data necessary for governments to take appropriate measures for the sustainability of the seas and oceans.** In other words, IGs are key as reliable sources and support for decision-making. While it is well known that information can be analysed or presented in one way or another, this is where the **problem arises with IGs that are not transparent in defining their underlying interests.**

- The role of IGs in public decision-making

Another important aspect regarding IGs, like NGOs or multinational companies, is the influence they have gained in decision-making, often derived from the pressure exerted by public opinion resulting from the investment in advertising made by these

organizations. It must be emphasised that everyone has a responsibility in the management and maintenance of the seas and oceans, but only entities with international subjectivity can legislate in this area. We are referring to States and certain International Organisations, as they are subjects with rights and obligations at the international level, and not to be confused with other actors in international relations, such as IGs. This can be summarised as follows: **IGs cannot implement their objectives as standards** at the international, national or local level (depending on their scope). That is, IGs are not elected by citizens, **but they do have the capacity to influence decision-making**. Therefore, the information on IGs or their activities must be analysed with caution.

As previously mentioned, **IGs can complement and collaborate with governments and international organisations with the authority to legislate in the gaps where the former have limited focus or resources**. This is especially true for the most representative IGs in each sector, since they can **convey the real needs of society to the legislator**. In the case of conservationist IGs, these are more global and general needs. Therefore, they do not analyse the needs from the bottom up, issues that affect daily life, resulting in a disconnection from real needs or the current situation. Thus, some **conservationist IGs tend to propose ambitious goals, usually requiring them to be set in the medium and short term**, omitting the need for long-term planning - the only one that has proven effective in the management of seas and oceans, given their complexity and scope. **This leads civil society to believe that business IGs are trying to postpone their obligations**, when the reality is that many of the changes to be made require implementation by phases in order to be truly sustainable in all three dimensions.

Therefore, the activity of IGs should not be judged by their proposals, but rather by an assessment of the impact of their activities, that is, by whether or not the result is efficient and sustainable.

The report analyses influential IGs at the European territorial level. It is noteworthy here that **certain IGs, especially some NGOs of non-EU origin, focus part of their activity and objectives on the seas and oceans of the EU or where EU states have economic activities and do not demand the same in the territorial seas of their origin**. As mentioned above, if we look at the funds from which they are financed, certain economic interests may be evident beyond the visible and public objective of the IGs. This affects the trust of operators in the blue sectors, as the capacity of certain IGs is growing, with the consequent danger to the maintenance of economic activities, especially fishing,

as a provider of high-quality food for society. This implies a lack of alignment with local priorities and needs.

The influence of IGs from other geographical areas, with limited knowledge of the European reality and the cultural, social and economic dynamics of the region they seek to influence, can affect the effectiveness of their programmes. It **can even be seen as an imposition of Western (American) models in Europe**, that is, not only addressing the specific characteristics of the area in which they intend to operate, but also the European archetype or paradigm.

It is known that some IGs have political and economic agendas behind their participation in the protection of the European marine environment, focused on commercial and political motivations aimed at benefiting the interests of third states. **The initiatives of certain IGs in this sector have a clear influence** even on local companies. The implications of this in a fully globalised world **entail competition between the local interests of coastal states dependent on the same or similar current and future economic activities** in the blue sectors. **Las iniciativas de determinados GI en este sector tienen una influencia** clara hasta en las empresas locales. Cuyas implicaciones en un mundo totalmente globalizado **suponen una competencia entre los intereses locales de estados ribereños dependientes de las mismas o similares actividades económicas** presentes y futuras en los sectores azules.