



Promoting the indefensible: Saudi Arabia's Brussels lobby shop

There can be few more controversial clients for a lobbying consultancy than the regime of the Kingdom of Saudi Arabia. No surprises, then, that a Brussels-based lobbying firm has been less than forthcoming about its role. Corporate Europe Observatory lifts the lid on the company lobbying on behalf of this repressive regime.

Corporate Europe Observatory can exclusively reveal that, according to an industry insider, MSL Brussels – part of French media conglomerate Publicis Groupe – has had a contract to represent the government of the Kingdom of Saudi Arabia in the EU from at least October 2015. However, despite MSL Brussels having an entry in the EU's lobbying Transparency Register, they have not included Saudi Arabia in their list of clients.¹ Given the kingdom's brutal reputation (see [Box 1](#)) there are plenty of reasons for MSL Brussels to wish to keep this contract quiet.

MSL Brussels has represented the Saudi Foreign Office and Crown Prince Mohammed Bin Salman, via the Saudi Mission to the EU, helping to convey the country's key lobbying positions to MEPs, the press, and EU institutions. They helped frame the PR narrative and lobbied on some of the key issues facing the kingdom, including:

**there are plenty of reasons for
MSL Brussels to wish to keep
this contract quiet**

- Defending the kingdom from accusations that it was linked to the export of terrorism, including by placing press stories on the subject in the wake of the Brussels terror attacks;
- Deflecting international condemnation of the Saudi-led coalition's conduct in the war in Yemen by emphasizing Saudi Arabia's humanitarian aid;
- Promoting the popularity of Crown Prince Mohammed Bin Salman ('MBS') and presenting him as a reformer;
- Presenting Saudi Arabia as a key ally for the West, and a serious and trusted partner for the EU, including in trade and foreign policy;
- Along with Burson Marsteller (now Burson Cohn & Wolfe), promoting the Islamic Military Alliance in Brussels (a coalition active in Yemen known as the 'Islamic NATO');

- Eliciting EU support against a US law that allows the families of 9/11 victims to sue Saudi Arabia;
- Whitewashing the country’s terrible human rights record by putting a positive spin on progress on women’s rights and other stories; and
- Promoting its commitment to tackling global warming, despite it being the world’s largest oil producer and a key obstacle in UN talks to tackle climate change, among many other topics.

BOX 1: A BRUTAL REGIME

Saudi Arabia, an absolute monarchy that detains, tortures, and executes its civilians, has been named as a key exporter of terrorist ideology and financing.² It has also waged a brutal campaign in Yemen since 2015. The kingdom received an additional wave of condemnation in the wake of the October 2018 assassination of *Washington Post* journalist Jamal Khashoggi. Several lobby firms ended their work for the country in protest, including Gladstone Place Partners; Glover Park Group; BGR; Gibson, Dunn & Crutcher; and Portland Communications.³ However Qorvis MSL, the source of the MSL Brussels contract has not (see [Box 4](#)).⁴ *The Economist* notes the “increasingly authoritarian and unpredictable nature” of Crown Prince Mohammed Bin Salman, and lists the country in the bottom ten of all countries in its ‘Democracy Index 2018’.⁵

Saudi Arabia already has diplomatic channels with the EU. This begs the question whether it is legitimate for EU-based lobby consultancies to be part of a third-country propaganda effort to influence European institutions and press, and to have concealed their role in doing so. At the time of publication MSL Brussels had not replied to Corporate Europe Observatory’s requests for comment.

it is legitimate for EU-based lobby consultancies to be part of a third-country propaganda effort to influence European institutions and press

Between 2015 and late 2017, MSL Brussels’ support to the Saudi Arabian Foreign Office included running the website and Twitter accounts of the Kingdom of Saudi Arabia’s Mission to the EU (which also serves as its embassy to Belgium and Luxembourg). They lobbied MEPs (see [Box 6](#)), sent daily monitoring reports concerning Belgian and international press to the client, and placed stories promoting Saudi Arabia’s positions in the media. They also sent relevant political updates from the European and Belgian parliaments to the Saudi Mission. They helped with Mission events and set out to organise trips for Saudi parliamentarians to the European Parliament. Their lobbying targets were often MEPs in the Foreign Affairs Committee and the Delegation to the Arabian Peninsula. They also wrote and sent out a monthly newsletter to a long list of key politicians and officials in the European Parliament, the Commission, and the European External Action Service (the EU’s diplomatic service, which is responsible for EU foreign and security policy).

BOX 2: BRUSSELS, BERLIN, PARIS...

According to our source, the relevant MSL offices in Berlin and Paris did similar work for the Saudi Foreign Office in Germany and France, including for their respective Saudi embassies. Sister company in the Publicis Groupe, CNC (now KekstCNC) also lobbied on behalf of Saudi Arabia in Germany. These roles should also have been entered in the Transparency Register, whether based in Brussels or not, if they were engaged in activities intended to “influence the law-making and policy implementation process of the EU institutions”.⁶

MSL’s lobbying work has been conducted under the radar. For example, it appears as though from 2016 to today, MSL Brussels has misleadingly listed its client as ‘Qorvis’ in the Transparency Register.⁷ Qorvis MSLGROUP USA is a sister company based in Washington DC, owned by MSL Brussels’ proprietor Publicis since 2014.⁸ Qorvis MSL is also Saudi Arabia’s highest paid lobbying firm in Washington,⁹ with a multi-million dollar contract (see [Box 4](#)).¹⁰ According to an inside source, Qorvis subcontracted the role of representing the Saudi Foreign Office via the Mission of the Kingdom of Saudi Arabia to the EU to MSL Brussels from late 2015 onwards. This Brussels contract appears to have been severed by Saudi Arabia sometime after the second half of 2017, though the Qorvis MSL contract in the US continues.¹¹

MSL Brussels appears to have dramatically under-reported the value of the contract

In addition, MSL Brussels appears to have dramatically under-reported the value of the contract in question. In the EU Transparency Register it reports the Qorvis contract as worth €50,000–€99,000 annually.¹² Yet insider sources indicate that Saudi Arabia was MSL Brussels’ main client, and that the contract was actually worth in the region of €110,000 a month. This is approximately €1,320,000 annually, almost double MSL Brussels’ entire annual lobbying budget for 2017 as reported in the Transparency Register,¹³ and almost three times that of 2016.¹⁴

BOX 3: CONTEXT: REGIONAL BATTLE FOR INFLUENCE

Saudi Arabia’s spending on lobbying in the EU and US needs to be considered in a wider context, since a kind of proxy war for influence by Gulf powers is being playing out via lobbyists in Washington and Brussels. Indeed, this rivalry between Saudi Arabia and Iran for dominance in the region has boosted the kingdom’s lobbying spend in Western capitals. Moreover in June 2017 Saudi Arabia and its allies, which include Egypt, Bahrain, and the United Arab Emirates, cut off relations with the Gulf state of Qatar, with both Saudi Arabia and Qatar increasing lobbying spending as a result (UAE, Bahrain, and Egypt also employ their own lobbyists in the US).¹⁵

One example of how this lobbying war plays out, according to *Politico*, is Qorvis MSLGROUP’s briefing of reporters during the Qatari Foreign Minister’s 2017 visit to Washington DC. Qorvis presented questions for journalists to ask Qatari officials that were framed within the context of the Saudi Arabian perspective, such as “When will Qatar suspend its funding for Hamas and expel its leadership from the country?”¹⁶



MSL tweets about the reformer Crown Prince.¹⁷ The European Parliament describes "a pattern of a widespread crackdown against prominent human rights defenders, women activists, lawyers, journalists, writers and bloggers" since the Crown Prince took control of Saudi Arabia's security apparatus.¹⁸

BOX 4: QORVIS MSL

Washington DC-based PR firm Qorvis was bought by MSLGROUP's owners, Publicise Groupe, in 2014.¹⁹ Upon the occasion of the merger the company's website celebrated "Qorvis' deep reservoir of relationships in the public affairs community in Washington and with governments around the world". It pointed out the advantages of the merger: "Qorvis clients can now access MSLGROUP experts in nine practice areas and more than 20 specialties from around the world. And this access is through a single point of service. Additionally, as experts from both firms start to work together and with our clients in new ways, the potential for breakthrough ideas and programs heightens significantly."²⁰

Qorvis has been polishing the image of the Kingdom of Saudi Arabia in the US since 2001, following the 11 September attacks, when it emerged that 15 of the 19 hijackers were Saudi citizens.²¹ The lobby firm's website says of Saudi Arabia that it is: "often misunderstood among Americans, the media and the policymaking elite, and falsely portrayed by critics and rival governments that want to destabilize Saudi-U.S. relations or upend America's leadership in the region."²² The latest contract filed with the US Justice Department is for 2018.²³ After Publicis acquired Qorvis, it subcontracted PR work to MSL Brussels in 2015. Other MSL offices such as Berlin and Paris did similar work in their own capitals.

Qorvis suffered a haemorrhaging of staff in 2011, around the time of the Arab spring, specifically because of its willingness to represent repressive regimes: "more than a third of the partners at Qorvis have left the firm to start their own lobby shops, partly because of the firm's work on behalf of such clients as Yemen, Bahrain, Saudi Arabia and the Central African nation of Equatorial Guinea," reported the *Huffington Post*. "I just have trouble working with despotic dictators killing their own people," said one Qorvis insider to the news site.²⁴ In the same report, unhappy former staff members of Qorvis claimed that many of its most controversial 'black hat' clients come via that company's relationship with the UK's most notorious public relations firm, Bell Pottinger. (Bell Pottinger is now defunct, but former owners and staff are running several new PR firms, including outfits such as Consulium in London, which represents Saudi Arabia Military Industries (SAMI), and Sans Frontières Associates.)²⁵

Recent highlights of Qorvis' PR tasks for Saudi Arabia include media work, organising outreach and lobby meetings (including chaperoning the Crown Prince on a US visit), and directing PR for the Saudi-led campaign in Yemen. Qorvis created and currently runs various propaganda sites including operationrenewalofhope.com, yemenplan.org, arabianow.org, as well as running social media and YouTube channels for the kingdom's 'Yemen Comprehensive Humanitarian Operations'. It also placed an article by the Saudi Foreign Minister in *Newsweek* portraying Saudi Arabia as a bulwark against

terrorism.²⁶ (See [Yemen section](#) for similar PR focus on behalf of Saudi Arabia by MSL Brussels.)

Qorvis MSL's 2018 US Justice Department filing also includes information on contact with business representatives on behalf of Saudi Arabia. These include Lockheed Martin and the US Chamber of Commerce during the Crown Prince's visit to the United States. It also mentions an engagement with secretive UK corporate intelligence firm Hakluyt & Company, in connection with an event hosted by the Saudi Ambassador.²⁷

Terrorism

Saudi Arabia uses PR framing to paint itself as primarily the victim of terrorism, and as leading the charge against it. On the other hand, leaked US diplomatic cables noted “donors in Saudi Arabia constitute the most significant source of funding to Sunni terrorist groups worldwide”;²⁸ and a July 2013 study commissioned by the European Parliament's Committee on Foreign Affairs described the Saudi-brand of Islam, Wahhabism, as a main source of global terrorism.²⁹

Saudi Arabia uses PR framing to paint itself as primarily the victim of terrorism, and as leading the charge against it

MSL Brussels worked to deflect press criticism of Saudi Arabia's relationship to terrorism in the wake of several ISIS attacks in European capitals. Shortly after the March 2016 suicide bombings in Brussels, in which 32 people were killed and 300 injured, MSL wrote and promoted a story in French and Flemish to Belgian media, on behalf of the Saudi Ambassador Abdulrahman S. Alahmed. It was picked up by weekly news magazine *Knack* with the title, 'Saudi Arabia condemns terrorism in all its forms, these are not empty words' and, after expressing sympathy, notes that "Saudi Arabia has also been the victim of attacks that sought to disrupt the country and terrorize Saudi civilians. That is why the Kingdom has taken steps to combat extremism, regardless of the motives, faith or nationality of the perpetrators." The piece promotes various Saudi foundations and initiatives to "promote justice, peace and reconciliation".³⁰ (See [below](#) for more on Saudi PR in the wake of the Brussels attacks.)

MSL Brussels' communications for the Mission also helped promote the narrative that Saudi Arabia is leading the fight to defund terrorist groups and prevent the spread of their ideologies. For example they quote Mohammed bin Salman on the occasion of the 2016 national day celebration, an annual event MSL helped organise at the Steigenberger Hotel in Brussels, saying: “the Kingdom of Saudi Arabia has presented a Saudi security experience which has been appreciated and admired by everyone and has become a source of benefit for many countries in fighting terrorism and drying up its intellectual and financial sources”.³¹

The Great Mosque of Belgium

Concerned by the ongoing criticism and attention that Saudi Arabia was receiving in the wake of the suicide bombings in Brussels, MSL closely monitored the activities of the

Belgian parliamentary committee looking into the attacks, and alleged links with the Great Mosque of Belgium, on behalf of the Saudi Arabian Foreign Office.

MSL closely monitored the activities of the Belgian parliamentary committee looking into the Brussels attacks

The lobbyists also reached out to the Belgian media in order to counter their reporting of supposed extremist links to the Great Mosque. On 11 February 2017, for example, MSL Brussels issued a press release on behalf of the Saudi Mission to the EU which criticised the “deeply embedded misconception” that Saudi Arabia was funding institutions that spread radical Islamist ideology, reiterating the core message that “the Saudi leadership has long been at the frontline of fighting terrorism” and pointing to its “leading role within the international coalition to combat terrorist groups”.³²

The press release also attacked the idea that the Saudi-funded Great Mosque of Brussels, the Muslim community’s leading religious institution in Belgium, had any links to terrorist ideology: “the Belgian Government itself found that there was not a trace of extremism to be found at the Great Mosque of Brussels when it conducted its investigation last year”. However according to Reuters a 2016 classified report by Belgian intelligence services noted, “the Wahhabi branch of Islam promoted at the mosque led Muslim youth to more radical ideas”.³³ While the Belgian Parliamentary Commission into the Brussels attacks indeed found no direct links to terrorist recruitment in the mosque, its October 2017 report noted that nine of those who had undertaken religious studies there had gone on to join radical foreign fighters,³⁴ and recommended Saudi Arabia’s control of the mosque be annulled. (In exchange for a guarantee of cheaper oil from Saudi Arabia, Belgium had leased the Grand Mosque to Riyadh rent-free in 1969).³⁵

Saudi Arabia agreed to withdraw from the mosque in 2018.³⁶ Before this mosque depended upon the Belgian Islamic and Cultural Centre (CICB), which has very close ties to Saudi Arabia: the President of its executive committee is the Saudi Arabian Ambassador,³⁷ Abdulrahman S. Alahmed, on whose behalf MSL Brussels worked. The executive committee of CICB also includes several members who live in Saudi Arabia, and the organisation was funded to the tune of five million euros a year by the Muslim World League (MWL), a Mecca-based missionary society funded by the Saudi Government, described by Reuters as: “for decades promot[ing] a hardline interpretation of Islam at dozens of institutions worldwide”.³⁸

Indeed, the Belgian Government had previously complained to the Saudi Ambassador about the inflammatory sermons of Khalid Alabri, the CICB’s then Director who was, at their request, quietly removed from his post in 2012.³⁹ He had been accused of propagating the extremist Takfiri doctrine (shared by groups like ISIS) which condones the use of violence against Muslims accused of apostasy. ‘The Saudi Cables’, leaked from the Kingdom of Saudi Arabia Ministry of Foreign Affairs and published in 2015 by Wikileaks, revealed Saudi Ambassador to the EU Abdulrahman S. Alahmed explaining the imam’s removal in an internal memo, and complaining that “the Belgian government has become obsessed with the rise of Islamic extremism (as they see it)”.⁴⁰

9/11 families suing Saudi Arabia

Another of the key lobbying themes that MSL Brussels worked on for Saudi Arabia was

mobilising EU support to oppose a 2016 US law, the Justice Against Sponsors of Terrorism Act, or JASTA. (Note that lobbying on this didn't end after the law was passed, as there is an ongoing question

MSL Brussels helped Saudi Arabia try and persuade the EU to back its opposition to JASTA

into how the law may be applied.) This legislation facilitated a civil lawsuit against the Government of Saudi Arabia, brought by survivors and the families of those killed in the 11 September 2001 attacks.⁴¹ On 20 March 2017 plaintiffs consisting of 1,500 survivors and 850 family members filed a class action lawsuit alleging that the Government of Saudi Arabia "knowingly provided material support and resources to the al Qaeda terrorist organization and facilitating the September 11th Attacks". They allege that some Saudi Arabian officials provided financial support to Al Qaeda, funded terrorist training camps in Afghanistan, provided "critical logistical support and resources to al Qaeda around the world", and that they "actively supported al Qaeda in its final preparations for the September 11th Attacks through a network of the Kingdom's officers, employees and/or agents who met with and aided the hijackers, providing them with money, cover, advice, contacts, transportation, assistance with language and US culture, identification, access to pilot training and other material support and resources".⁴²

Should the plaintiffs win, considerable Saudi wealth and assets in the USA could be affected. Not surprisingly, Saudi Arabia has employed an army of lobbyists to counter the legislation. Most controversially, Qorvis MSL orchestrated a 2016 visit to Washington DC for around 40 unwitting US army veterans to lobby against JASTA, who weren't told Saudi Arabia was the client behind the PR move.⁴³ (See [Box 4](#) for more on Qorvis MSL.)

Meanwhile MSL Brussels helped Saudi Arabia try and persuade the EU to back its opposition to JASTA, regarding Europe as a key ally against the law, since it raises questions of sovereign immunity from prosecution. For example the November 2016 Mission newsletter produced by MSL Brussels describes JASTA as a "Pandora's box" which risks "destabilising international cooperation in the fight against terrorism at such a fragile moment in history".⁴⁴

The Saudi Ambassador to the EU wrote an op-ed for the online European media platform *Euractiv* on the subject, which MSL placed (it also featured on the MSL Brussels-managed mission website).⁴⁵ In it he urges that "the EU and its member states should consider taking diplomatic and parliamentary actions to persuade the standing Congress to amend or repeal the bill", and pushes for EU support in making their position heard in Washington: "More specifically, the EU, which already expressed its reserve about the bill before its adoption, could urge the US Congress to restore the operative Foreign Sovereign Immunities Act provision that JASTA withdrew."⁴⁶

MEP Rachida Dati (see [Box 6](#) on lobbying of MEPs) tabled a parliamentary question critical of JASTA on 17 October 2016: "Bearing in mind the impact of this act on international law and the fact that the EU has long advocated a multipolar world, what implications might ensue, in the opinion of the High Representative, from the adoption of the Justice Against Sponsors of Terrorism Act?"⁴⁷

Framing Saudi Arabia as a key ally against terror

Saudi Arabia consistently presents itself as a key ally to the EU in its efforts to counter terrorism, as reflected in its PR strategies.

However Saudi Arabia has been strongly criticized by human rights group for opportunistically labelling both domestic dissidents, and rival nations such as Iran and Qatar, as terrorists or sources of terrorism. For example Amnesty International condemned Saudi Arabia for “using the death penalty in the name of counter-terror to settle scores and crush dissidents,” in the wake of the mass beheading of 47 dissidents in a single day in January 2016.⁴⁸

Saudi Arabia is strongly criticized by human rights group for opportunistically labelling both domestic dissidents, and rival nations such as Iran and Qatar, as terrorists



Gilles de Kerchove: #SaudiArabia is a reference in #counter terrorism and it was the first victim of terrorism



MSL Brussels ran the Mission's Twitter feed, which included quoting this friendly message from the EU Counter-Terrorism Coordinator, Gilles de Kerchove.

3:20 PM - 20 Jul 2017 from Brussels, Belgium

Meanwhile Saudi-led projects like the Islamic Military Alliance (see [Box 5](#)) push the narrative that it is countries like Iran that are key exporters and funders of terrorism.

The war in Yemen is also framed in communications produced by MSL as being waged in self-defence and as an intervention against terrorism as well (see [Box 5](#) and [The fog of war](#) section). Qatar is also frequently portrayed as a key exporter of terrorism and terror funding.

The MSL-produced EU Mission website promotes Saudi King Salman's positioning of Iran as the leading source of global terrorism.



BOX 5: ISLAMIC MILITARY ALLIANCE

Relevant European PR companies: **MSL Brussels, Burson Cohn & Wolfe (previously Burson Marsteller)**

The Islamic Military Alliance, formally known as the Islamic Military Counter Terrorism Coalition (IMCTC), is a coalition of 41 countries co-ordinated by Saudi Arabia that has been described as the 'Islamic NATO'. This controversial initiative, announced in Riyadh in December 2015, appears to be a foreign policy move by Saudi Arabia to maintain dominance and paint Iran and its political allies as *the* key exporters of global terrorism. The coalition is only formed of countries with majority Sunni Muslim populations, and is currently active in Yemen alone, as part of the Saudi Arabian offensive.

Critics have expressed concern that the public relations push for this Saudi-led axis helps to create a front that could involve more Muslim countries in sectarian conflicts in the region.⁴⁹ "This alliance is a clear signal to the Arab-Islamic world that Saudi Arabia still wants to set the main agenda in regional policy and, of course, another instrument of containing Iran," according to Sebastian Sons, Associate Fellow at the German Council of Foreign Relations, quoted in a story in *DW.com*. "The definition of extremism in Saudi propaganda is that Iran is the terrorist. Thus, every anti-extremism measure is directed to roll back Iran's influence in the region and to demonize the Islamic Republic as the main sponsor of terrorism," Sons added.⁵⁰

Burson Cohn & Wolfe (BCW, previously Burson-Marsteller, BM): In the EU Transparency Register, BCW in Brussels reports a contract worth less than €9,999, for the years 2015, 2016, and 2017, to represent the Islamic Military Counter Terrorism Coalition (IMCTC).⁵¹

According to *Middle Eastern Eye*, the London wing of the company was awarded the contract by Crown Prince Mohammed Bin Salman, who is also the Saudi Defence Minister. Their role is to undertake media work promoting the Islamic Military Alliance.⁵²

This was seen as part of the company's move to develop more security and defence related clientele in Brussels. Vice Admiral Peter Hudson, Commander of NATO's Maritime Command Headquarters between 2013 and 2016, worked with Burson-Marsteller Brussels between February 2017 and January 2018 to establish a new defence section at the company, acting as a "trusted advisor to board members on the European defence sector, raising awareness on defence and security issue so that BM can provide expertise to clients on such matters within the context of their core outputs."⁵³ He also continued to work with NATO in an advisory capacity at the same time.⁵⁴

Dennis Abbot, BCW's Managing Director for Communications in Brussels, was also mentioned by *PRWeek* as another senior figure involved in the company's move to develop its security and defence clientele;⁵⁵ he joined in 2015 after six years working for the European Commission.⁵⁶

Meanwhile the BCW office in Washington DC has lodged a Saudi Arabian contract with the Islamic Military Alliance with the Foreign Agents Registration Act (FARA) database.⁵⁷ The contract is to "Support Global Counter Terrorism Week event in Riyadh by: content development, media monitoring, media relations, stakeholder engagement/event support

(including inviting speakers and participants) and managing a press office (virtual in Brussels and US and actual in Riyadh during the GCTW),” and has a value of US\$53,300 for 2017.⁵⁸

MSL Brussels: MSL Brussels, as part of its contract to represent Saudi Arabia’s Mission to the EU, has also promoted the Islamic Military Alliance and its work, via the Mission’s website and Twitter. It repeatedly echoes Saudi Arabia’s claim to be “Fighting terrorism on all fronts”, reporting in September 2016 that, “The first meeting of the Islamic Military Alliance to combat terrorism was held in Riyadh today. Military chiefs from the member states vowed to ‘dry up terrorists’ resources’.”⁵⁹

The fog of war

MSL Brussels’ communications work enters us into a topsy-turvy world where Saudi Arabia – spending vast sums to wage war in Yemen, blockading food supplies, bombing its water systems, and recruiting child soldiers to fight – is portrayed primarily as occupied with humanitarian concerns, sending food aid, setting up cholera clinics, and rehabilitating child soldiers allegedly recruited by the other side.

MSL Brussels’ communications work enters us into a topsy-turvy world where Saudi Arabia is primarily occupied with humanitarian concerns

Yemen

MSL Brussels has produced a considerable quantity of material for Saudi Arabia focused on ‘KSRelief’ (King Salman Humanitarian Aid and Relief Centre). This distracts attention away from the fact that Saudi Arabia *created* many of the humanitarian crises it says it is helping with. In Yemen, for example, the Saudi-led coalition has used starvation as a weapon of war, through both blockades and bombardment of domestic food production and storage facilities.⁶⁰ While both sides in the conflict have been accused of war crimes, the Saudi-led coalition has an outsized and well-resourced war machine compared to its opponents. Human rights groups have accused the Saudis of targeting civilians, and blamed their air strikes for the destruction of medical clinics and critical infrastructure. According to Human Rights Watch, “Saudi commanders face possible criminal liability for war crimes as a matter of command responsibility.”⁶¹

The Mission website run by MSL contains video from October 2016 by the Supervisor General of KSRelief presenting the organisation’s aims in Brussels,⁶² and another entry from the same month claims: “The Kingdom is one of the world’s leading humanitarian donors”. It shows KSRelief officials sharing details of their programme in bi-lateral meetings with senior Commission officials and EU policymakers.⁶³ MSL also produced a series of propaganda infographics highlighting Saudi Arabia’s aid to Yemen.⁶⁴



KSA Mission EU @KSAMissionEU
 @ksrelief Dr.Alrabeeah discussed humanitarian aid projects with EU Head of delegation to Yemen Ms. Antonia Calvo Puerto .@eu_eeas #Brussels



MSL Brussels promotes Saudi Arabia's meeting to discuss its aid programmes with European External Action Service, the EU's diplomatic service responsible for foreign affairs and security policy.



8:49 PM - 19 Oct 2016

Blockades: There has been an intense focus on spinning the Saudi-led coalitions' conduct of the war in Yemen. For example, the Mission's EU website produced by MSL claims: "The rebels are blocking activity in the ports in an effort to damage the Saudi-led Coalition's reputation whilst pocketing the black market income it generates." The February 2017 newsletter boasts that despite this, "KSR Relief is proud

that the centre in Yemen has been able to reach all regions of the country, irrespective of who is in control.... demonstrating Saudi Arabia impartiality and adherence to the international humanitarian law."⁶⁵

However, the UN Special Rapporteur on human rights and international sanctions, Idriss Jazairy, stresses that the aerial and naval blockade imposed on Yemen by the Saudi-led coalition since March 2015 is one of the main causes of the humanitarian catastrophe in the country.⁶⁶ Disrupted food, fuel, and medical supplies due to the blockade, along with bombardment of Yemen's infrastructure, have resulted in mass malnutrition. More than 85,000 children under the age of five may have died from starvation during the Saudi-led intervention in Yemen, according to a November 2018 report by Save the Children.⁶⁷

Cholera: MSL Brussels also spun a story about Saudi Arabia's 'battle' against cholera in Yemen. A 24 May 2017 post on the Saudi Arabia's Mission website states that "25 trucks carrying 550 tons of medicines have been sent to Yemen by the King Salman Center for Relief and Humanitarian Action in a massive campaign aiming to tackle the cholera epidemic in Yemen."⁶⁸ However, a 2017 op-ed by global health expert Jonathan Kennedy in *The Guardian* states the cholera outbreak is "a direct outcome of the Saudi-led coalition's strategy of targeting civilians and infrastructure in rebel-controlled areas."⁶⁹ The epidemic of cholera that broke out in April 2017, due to the aerial bombardment of water infrastructure, has infected an estimated 1.2 million people.⁷⁰

Child soldiers: The Saudi EU Mission's website criticises the Houthi movement's use of child soldiers in Yemen,⁷¹ and its newsletter promotes the Saudi "Child Soldiers Rehabilitation Project" which "provides multi-level assistance for children who were recruited by Houthi militias".⁷² Again this distracts from the Saudi coalition's own culpability: an extensive 2018 *New York Times* investigation has found that Saudi Arabia recruits Sudanese child soldiers to fight in Yemen as mercenaries, and, according to returned Sudanese soldiers quoted in the piece, make up at least 20 per cent of the fighting units.⁷³

Arms sales: Saudi Arabia has employed PR to help to avoid arms embargoes. For example, in April 2017 MSL circulated a fact sheet from the Saudi Mission on ‘Saudi Arabia and the Conflict in Yemen’, which insisted that “Saudi Arabia has a right to defend itself with weapons purchased with their own funds” and that “Support for Saudi arms sales is support for Saudi Arabia fighting its own battles in the region.”⁷⁴ Several times the European Parliament has called for an EU-wide arms embargo, including in June 2017, shortly after this fact sheet was circulated.⁷⁵ In 2018, after the murder of journalist Jamal Khashoggi, the European Parliament passed a resolution for EU countries to stop selling arms to Saudi Arabia.⁷⁶

Other communications work MSL Brussels undertook for Saudi Arabia included promoting the results of a judicial review looking into UK arms sales to the kingdom. An entry on the Saudi Mission’s website is titled: “UK High Court confirms Saudi Arabia’s respect for the principles of International Humanitarian Law” and celebrates the rejection of a claim brought by British NGO Campaign Against the Arms Trade (CAAT) against the UK’s Secretary of State for International Trade.⁷⁷ CAAT claims that British arms sales to Saudi Arabia should not go ahead because UK weapons are used in violation of international humanitarian law in Yemen.⁷⁸

More than 85,000 children under the age of five may have died from starvation during the Saudi-led intervention in Yemen

EU trade and relations

An important lobbying strand for MSL Brussels has been the presentation of Saudi Arabia as a modernising, key trade partner to the EU, particularly in the context of Crown Prince Mohammed Bin Salman’s ‘Vision 2030’, which he announced on 25 April 2016.

Communications produced by MSL Brussels for the Saudi EU Mission emphasizes the twinned social and economic reform that Vision 2030 represents – selling the business opportunities and ignoring the still-ongoing human rights abuses. The Mission’s November 2017 newsletter quotes former French President Nicolas Sarkozy as saying: “I am not sure the world has understood the importance of what is happening in Saudi Arabia. This is like a tsunami,” at an event called the Future Investment Initiative, a global investment conference held in Riyadh. The newsletter goes on to celebrate how: “Top British and American businessmen also discussed investment strategies during a session dedicated to “The world in 2030: Creating value for the next generation”. The hosts, the Public Investment Fund of Saudi Arabia (PIF), are described as “looking for further international partnerships as part of their aim to become the largest sovereign wealth fund in the world.”⁷⁹

Selling reform? ‘Vision2030’ pledges to improve the situation of women. Yet the male guardianship system continues.⁸⁰



BOX 6: OUTREACH TO MEPS

An important aspect of MSL Brussels' role has been lobbying MEPs on behalf of its client, the government of Saudi Arabia. MEPs regarded as potentially friendly lobbying targets include French MEPs Michèle Alliot-Marie and Rachida Dati, both former ministers in French conservative administrations, and both members of the right wing European People's Party grouping in the EU Parliament. France – one of Saudi Arabia's major arms exporters (along with the US and UK) – remains opposed to Germany's suspension of arms sales to Saudi Arabia after the October 2018 murder of Jamal Khashoggi. Saudi Arabia was the second-biggest purchaser of French arms between 2008 and 2017, with deals totalling more than \$12.5bn; according to the Stockholm International Peace Research Institute (SIPRI), it also accounted for nearly half of the UK's arms exports in 2017.⁸¹

MEP Michèle Alliot-Marie is Chair of the European Parliament's Delegation for Relations with the Arabian Peninsula (DARP). A key figure in French right-wing governments from the 1980s onwards, she had to resign her post as Minister for Foreign Affairs in the Sarkozy administration in 2011 after she offered French support to the Tunisian Government during the beginning of the Arab spring, in order to quell the pro-democracy protests. The BBC reported that for some this scandal symbolized the problem of "an unhealthy personal proximity between French politicians and autocratic leaders in the Middle East".⁸² She became an MEP in 2014.

In 2015 Alliot tabled several amendments aimed at weakening potential EU restrictions on exports of surveillance technology to repressive regimes, in relation to debate around a legislative proposal entitled: 'Human rights and technology: the impact of intrusion and surveillance systems on human rights in third countries'.⁸³

As Chair of the European Parliament's Delegation for Relations with the Arabian Peninsula, Alliot several times visited the Kingdom of Saudi Arabia, and welcomed officials to Brussels. For example she took a trip to Riyadh along with four other MEPs in late 2017 when,⁸⁴ as the Saudi Arabian EU Mission newsletter notes, MEPs "met with HE Al Qassabi, Saudi Minister for commerce and investment" and "announced the launch of a Working group on Saudi Vision 2030. It will contribute to a stronger relationship and cooperation on trade and investment between the Kingdom of Saudi Arabia and the European Union."⁸⁵

MEP Rachida Dati formerly served in the Sarkozy administration as Minister of Justice, although she was subsequently dropped. She became an MEP in 2009.

In 2016 Dati was invited to Riyadh by the Saudi authorities to discuss her parliamentary work on terrorism and preventing radicalisation. Dati's press office says of this visit: "The Saudi authorities have reaffirmed their full commitment to the fight against terrorism by criminalizing those who provide financial support to terrorist organizations and setting up centers for counseling, care and de-radicalization follow-up. All these initiatives confirm the strategic role played by this country within the Islamic Military Counter Terrorism Coalition, for regional stability and the security of Europeans." (See [Box 5](#) on the controversial Islamic Military Alliance).⁸⁶

In 2016 Dati also filed a critical parliamentary question about the Justice Against Sponsors of Terrorism Act (JASTA), a US law that allows families of 9/11 to sue Saudi Arabia.⁸⁷ (See [9/11 families suing Saudi Arabia.](#))

Dati is currently a 'substitute' on the Delegation for Relations with the Arabian Peninsula and, along with Alliot, met with Saudi Foreign Minister Adel al-Jubeir when he visited the European Parliament in February 2018.⁸⁸

Sample of votes* in the European Parliament related to Saudi Arabia:

- At a 25 February 2016 vote on the humanitarian situation in Yemen, Alliot abstained, and voted against restriction of arms exports to Saudi Arabia; Dati voted for the resolution but abstained on calls to restrict arms exports.
- At a 31 May 2018 vote condemning the arrest of 11 prominent women’s rights defenders and human rights activists in Saudi Arabia, both Alliot and Dati defied their party grouping by voting against the resolution. Dati later entered a note saying she had planned to abstain.
- At a 4 October 2018 vote on the situation in Yemen, Alliot voted against and Dati abstained on a paragraph which "urges all EU Member States in this context to refrain from selling arms and any military equipment to Saudi Arabia".⁸⁹
- At the 25 October 2018 vote to condemn the assassination of Jamal Khashoggi in the Istanbul embassy, Alliot and Dati both voted in favour. However, Alliot rejected paragraph 14 which called for an EU-wide arms embargo against Saudi Arabia, including "the export of surveillance systems and other dual-use items that may be used in Saudi Arabia for the purposes of repression";⁹⁰ Dati abstained on the same paragraph.

* Voting information from Votewatch.eu.

At the time of publication, neither MEP had responded to a request for comment from Corporate Europe Observatory.

In September 2017, the Saudi EU Mission produced a glossy photo brochure celebrating 50 years of “Saudi-EU cooperation and partnership” for an “overview of the cordial relations that have blossomed between the Kingdom of Saudi Arabia and the European Union over the past 50 years”. It reiterates the key point that “Saudi Arabia is the EU’s 15th biggest trading partner and our shared trade was worth €53 billion in 2016.”⁹¹

“Saudi Arabia is the EU’s 15th biggest trading partner and our shared trade was worth €53 billion in 2016”

The brochure also celebrates “Parliamentary cooperation,” which it says “has a long history in Saudi-EU ties. The Majlis Al-Shura – the Saudi consultative assembly has had meaningful and frank exchanges with members of the dedicated Delegation for Relations with the Arabian Peninsula as well as

Committee for Foreign Affairs in the European Parliament.” MSL Brussels was charged with trying to organise visits to the EU for Saudi parliamentarians. The brochure talks of the “Regular visits to the Kingdom paid by Senior European Commission representatives,” as part of “a fruitful dialogue and... a shared desire to grow and modernise our economies together.” And finally, hitting almost all the lobbying/propaganda points that Saudi Arabia has in relation to the EU, it concludes: “The Kingdom of Saudi Arabia and the EU are united on a wide range of issues, be it the need for a Middle East peace process, the fight against terrorism, support for international development programs, safeguarding the supply of energy, putting an end to the proliferation of weapons of mass destruction and minimising the impact of global warming.”⁹²

MSL Brussels promotes supposedly reform-minded energy and climate messaging on Twitter. But Saudi Arabia, the world's largest oil producer, has repeatedly been a major block to climate progress at UN meetings.⁹³

The Saudi EU Mission website also promotes several high-profile business and trade meetings such as the November 2017 Saudi Arabia - Belgium Business Forum, "Vision 2030: Towards a smart partnership". The event, co-organised by the Arab-Belgian-Luxembourg Chamber of Commerce (ABLCC), in collaboration with the Council of Saudi Chambers (28 Saudi chambers of commerce), and technology industry lobby group AGORIA (Belgium's largest employers' organisation and trade association), welcomed a delegation of businessmen from Saudi Arabia to Brussels. The ABLCC states that "Belgium is also the 10th country importing from Saudi Arabia" and noted that, "the genuine interest of Belgian entrepreneurs for the new vision 2030 and the Saudi Market!"⁹⁴



7:32 PM - 12 Jul 2016

Conclusion

MSL has hidden this controversial but lucrative client. And, according to our source, after its previous contract for Saudi Arabia ended at some point after late 2017, it remains keen to woo Saudi Arabia back.

"If you're embarrassed by your clients, if you don't want to say who they are... it shows you know it's indefensible work." – Human Rights Watch

However Corporate Europe Observatory's view is that there is no legitimate business case for PR and lobbying work of this kind. Many lobby firms suffer from an ethical 'tunnel vision' when it comes to taking on repressive regimes as clients, claiming, as an editorial in the PR news site the *Holmes Report* does, that "The underlying question ought to be about the ethics of the firm's advice, not the ethics of the client".⁹⁵

Yet public relations, media communications, branding, and lobbying, are all essentially about telling a story about the values and ethics of the clients, about who they are, what they represent, why one might want to ally with them, and what they stand for. Managing the message is a key component in the exercise of power. Its very purpose is to create financial and political support for a regime, both at home and abroad. There is no question of a lobby firm not being ethically implicated in the actions of its clients.

US trade sheet *O'DwyersPR* asks if it is good PR for a French communications company like Publicis (MSLGROUP's owner), a publicly traded company, to be "connected to a barbarous client with scant tolerance for dissent and freedom of the press?" Yet the piece

then goes on to rationalise the situation, observing that “even the most reprehensible client deserves the right to communicate. It’s the only way to promote understanding and positive change.”⁹⁶ However, public affairs consultants are not like lawyers, and one does not have a ‘right’ to the services of a lobby firm. No-one would argue against the promotion of dialogue and understanding, but Saudi Arabia already has well-funded diplomatic channels through which to communicate. There is no justifiable reason why MSL, or any other lobby firm, should collaborate with the Saudi Arabian regime.

Ultimately, if MSL Brussels thinks its work lobbying European Institutions on behalf of Saudi Arabia was legitimate, why did it leave out the client from its lobby register entry, when it was happy to share details of its other clients? As Andrew Strohlein from Human Rights Watch points out: “If you’re embarrassed by your clients, if you don’t want to say who they are, maybe there’s a reason for that. It shows you know it’s indefensible work.”

BOX 7: TRANSPARENCY FAILURE

In the US, failure to disclose third party government funding for a lobby operation is a federal crime (witness the jailing of Paul Manafort in the US). But in the EU there is a major lack of transparency over third-country influencing operations. Furthermore, there is no serious deterrent to misleading entries in the EU’s Transparency Register, such as MSL’s. There is only a voluntary ‘Code of Conduct’ which asks that companies:

a) always identify themselves by name and, by registration number, if applicable, and by the entity or entities they work for or represent; declare the interests, objectives or aims they promote and, where applicable, specify the clients or members whom they represent;

d) ensure that, to the best of their knowledge, information, which they provide upon registration, and subsequently in the framework of their activities covered by the Register, is complete, up-to-date and not misleading.⁹⁷

(Our complaint about MSL Brussel’s misleading entry in the Transparency Register will be available online via our website.)

Corporate Europe Observatory recommends that:

- The EU institutions replace the current voluntary lobbying register with a mandatory one.
- The EU register must be legally-binding, with well-resourced oversight and sanctions for non-compliance.
- Lobbyists must disclose accurate up-to-date client and financial information, and not hide their clients behind sub-contracts from sister firms.
- Transparency rules should include a specific clarification that lobbying for non-EU governments and states (including by lobby consultancy firms, law firms, think tanks and other groups) is required to be reported.
- Beyond that, EU Institutions should adopt ‘legislative footprints’ for each file, which could include lists of everyone they have met with to discuss specific issues, and force lobby organisations to submit their policy papers and other lobbying documents to a central, publicly accessible, online database.

On the 31 January 2018 members of the European Parliament will vote on a change to the Rules of Procedure that would oblige Rapporteurs, Shadow Rapporteurs, and Committee chairs to proactively list their lobby meetings. If this rule is adopted, there will be less space for those lobbying on behalf of repressive regimes and human rights abusers to hide their work.

To learn more about this and other ways in which the EU’s lobby transparency rules need to be reformed, and to find out how to help, visit the [Alliance for Lobby Transparency and Ethics Regulation in the EU \(ALTER-EU\)](#).

updated 9 October 2018;

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=19747905832-33>

2 'Wahhabism: a Short Guide', Independent (Ireland), June 11 2017

<https://www.independent.ie/world-news/war-on-terror/wahhabism-a-short-guide-35804858.html> ; European Parliament, Directorate-General For External Policies Of The Union Study, 'The Involvement of Salafism/Wahhabism in the Support and Supply of Arms to Rebel Groups around the World' June 2013, [http://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/457137/EXPO-AFET_ET\(2013\)457137_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/457137/EXPO-AFET_ET(2013)457137_EN.pdf) ; Spillius , Alex, 'Wikileaks: Saudis 'chief Funders Of Al-Qaeda'', *The Telegraph*, 5 December 2010, <https://www.telegraph.co.uk/news/worldnews/wikileaks/8182847/Wikileaks-Saudis-chief-funders-of-al-Qaeda.html>

3 Marszalek, Diana, 'More Us Lobbying Firms Cut Ties With Saudi Arabia', Holmes Report, 16 October 2018;

<https://www.holmesreport.com/latest/article/more-us-lobbying-firms-cut-ties-with-saudi-arabia>

4 Czarnecki, Sean, 'No 'Khashoggi Effect'', *PRWeek*, 7 November, 2018 ;

<https://www.prweek.com/article/1498265/no-khashoggi-effect-agencies-dont-abandon-saudi-arabia-despite-international-outcry>

5 Democracy Index 2018, *The Economist*.

6 EU Transparency Register Code of Conduct, https://ec.europa.eu/info/about-european-commission/service-standards-and-principles/transparency/transparency-register_en

7 Lobbyfacts.eu, using data from the EU Transparency Register, shows that from 2016 MSL Brussels started quoting 'Qorvis' as a client; <https://lobbyfacts.eu/representative/f130b89745dc465d94e8e8fdc027e1ee>

8 MSLGROUP website, 'Publicis Groupe Acquires Qorvis Communications', 1 October 2014;

<https://mslgroup.com/press-releases/publicis-groupe-acquires-qorvis-communications>

9 Landler, Mark; Vogel, Kenneth P; & Kelly, Kate, 'From Wall Street to K Street, Companies Gauge the Risks of Doing Business with Saudi Arabia', *The New York Times*, 11 October 2018;

<https://www.nytimes.com/2018/10/11/us/politics/saudi-arabia-business-risks.html>

10 Qorvis MSL's declaration to the US Department of Justice's Foreign Agents Registration Act database re its ongoing Saudi contract; <https://efile.fara.gov/docs/5483-Exhibit-AB-20180706-44.pdf> . Also see next reference.

11 You can see all the documents filed by Qorvis MSL to FARA (the US' Justice Department's Foreign Agents Registration Act database) including their latest Saudi Arabia contract and documents going back to 2002 here: https://efile.fara.gov/pls/apex/f?p=171:200:14969987382907::NO:RP,200:P200_REG_NUMBER:5483

12 EU Transparency Register, MSL Brussels - Division of MMS Communications Belgium SA, last updated 9 October 2018;

<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=19747905832-33>

13 *Ibid.*

14 According to the EU Transparency Register entry by MSL Brussels on 14 March 2017, recorded by Lobbyfacts.eu ; <https://lobbyfacts.eu/representative/f130b89745dc465d94e8e8fdc027e1ee/msl-brussels-division-of-mms-communications-belgium-sa>

15 Kerr, Simon, 'Saudi Arabia to launch global PR offensive to counter negative press', *Financial Times*, 12 September 2017 <https://www.ft.com/content/c7d57f8e-96ca-11e7-a652-cde3f882dd7b?segmentid=acee4131-99c2-09d3-a635-873e61754ec6> ; Bykowicz, Julie, 'The New Lobbying : Qatar Targeted 250 Trump 'Influencers' to Change US Policy', *Wall Street Journal*, 29 August 2018 <https://www.wsj.com/articles/the-new-lobbying-qatar-targeted-250-trump-influencers-to-change-u-s-policy-1535554647?mod=e2twp&page=1&pos=1> ; 'Crise du Golfe: les communicants parisiens font monter le cours des experts', *La Lettre A*, 23 April 2018

https://www.lalettrea.fr/action-publique_lobbying/2018/04/23/crise-du-golfe--les-communicants-parisiens-font-monter-le-cours-des-experts.108307878-qe0

16 Meyer, Theodor & Toosi, Nahal, 'Lobbyists cash in on dispute between Qatar and Saudi Arabia', *Politico USA*, 20 July 2017, <https://www.politico.eu/article/lobbyists-cash-in-on-dispute-between-qatar-saudi-arabia/>

17 Note the author of the *Washington Post* piece the tweet promotes is David Ignatius, criticised by US press watchdog FAIR in a 2017 piece entitled 'David Ignatius' 15 Years of Running Spin for Saudi Regime';

<https://fair.org/home/david-ignatius-15-years-of-running-spin-for-saudi-regime>

18 Aries, Quentin & McCauley, James, 'European Parliament passes resolution urging arms embargo on Saudi Arabia', *Washington Post*, 25 October 2018; https://www.washingtonpost.com/world/europe/european-parliament-passes-resolution-urging-arms-embargo-on-saudi-arabia/2018/10/25/cb324140-3172-4dc8-b373-4acc065fdb69_story.html?utm_term=.5d0a73781720

19 Publicis Groupe Acquires Qorvis Communications, 1 October 2014: <https://mslgroup.com/press-releases/publicis-groupe-acquires-qorvis-communications>

20 Qorvis Communications <https://www.qorvis.com/news/262>

21 Gerstein, Josh, 'P.R. Effort by Saudis Sparks Justice Probe' *The New York Sun*, 20 December 2004. <https://www.nysun.com/foreign/pr-effort-by-saudis-sparks-justice-probe/6502/>

22 Qorvis Communications, 'Our work: the Kingdom of Saudi Arabia', <https://www.qorvis.com/our-work/kingdom-of-saudi-arabia>

- 23 You can see all the documents filed by Qorvis MSL to FARA (the US' Foreign Agents Registration Act database) including their latest Saudi Arabia contract and documents going back to 2002 here: https://efile.fara.gov/pls/apex/f?p=171:200:14969987382907::NO:RP,200:P200_REG_NUMBER:5483
- 24 Barum, Marcus, 'Lobbyists Jump Ship In Wake Of Mideast Unrest', *Huffington Post*, 25 March 2011. https://www.huffingtonpost.co.uk/entry/lobbyist-mideast-unrest-departures_n_840231
- 25 'Consulum Advises Defence Groups in Gulf', *Intelligence Online* Issue 785, 26 June 2017, <https://www.intelligenceonline.com/corporate-intelligence/2017/06/21/consulum-advises-defence-groups-in-gulf.108250763-bre>
- 26 al-Dubeir, Abel bin Ahmed, 'The Saudis are fighting terrorism, don't believe otherwise', *Newsweek*, 3 February 2016, <https://www.newsweek.com/saudis-are-fighting-terrorism-dont-believe-otherwise-422710>
- 27 Efile, FARA Dept of Justice, 7 June 2018, <https://efile.fara.gov/docs/5483-Supplemental-Statement-20180706-27.pdf>
- 28 Op cit: <https://www.telegraph.co.uk/news/worldnews/wikileaks/8182847/wikileaks-saudis-chief-funders-of-al-qaeda.html>
- 29 Op cit <https://www.independent.ie/world-news/war-on-terror/wahhabism-a-short-guide-35804858.html> ; Op cit [http://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/457137/EXPO-AFET_ET\(2013\)457137_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/etudes/join/2013/457137/EXPO-AFET_ET(2013)457137_EN.pdf)
- 30 [Own translation] Alahmed, Abdulrahman Sulaiman, 'Saudi-arabië Veroordeelt Terrorisme in Al Zijn Vormen, Dat Zijn Geen Holle Woorden', *Knack*, 9 April 2016; https://m.knack.be/nieuws/belgie/saudi-arabie-veroordeelt-terrorisme-in-al-zijn-vormen-dat-zijn-geen-holle-woorden/article-opinion-689275.html?cookie_check=1548186257
- 31 KSA Mission EU, '86 Years Of the Kingdom Celebrated in Saudi Arabia and in Brussels', 26 September 2016; <http://ksaembassy.be/en/86-years-kingdom-celebrated-saudi-arabia-brussels/>
- 32 KSA Mission EU, Press release, 10 February 2017; <http://ksaembassy.be/wp-content/uploads/2017/02/press-release-KSA-embassy-BE.pdf>
- 33 Op cit: <https://www.reuters.com/article/us-europe-attacks-belgium-saudi-insight/giving-up-control-of-brussels-mosque-saudi-arabia-sends-a-signal-idUSKBN1FW0R3>
- 34 "the Saudi Arabian ambassador is the president of the CICB" [own translation], para 28, From: Belgian parliamentary enquiry: DOC 54 1752/009, Chambre des représentants de belgique, 23 octobre 2017, Enquête Parlementaire, 'Chargée d'examiner les circonstances qui ont conduit aux attentats terroristes du 22 mars 2016 dans l'aéroport de Bruxelles-National et dans la station de métro Maelbeek à Bruxelles, y compris l'évolution et la gestion de la lutte contre le radicalisme et la menace terroriste', Quatrième Rapport Intermédiaire Sur Le Volet "Radicalisme"; <https://www.dekamer.be/FLWB/PDF/54/1752/54K1752009.pdf>
- 35 Carbonnel, Alissa de & Kalin, Stephen, 'Giving Up Control Of Brussels Mosque, Saudi Arabia Sends a Signal', *Reuters*, 12 February 2018; <https://www.reuters.com/article/us-europe-attacks-belgium-saudi-insight/giving-up-control-of-brussels-mosque-saudi-arabia-sends-a-signal-idUSKBN1FW0R3>
- 36 'Saudi Arabia hands back Belgian mosque', *Euronews*, 13 February 2018; <https://www.euronews.com/2018/02/13/saudi-arabia-hands-back-belgian-mosque>
- 37 Op cit: <https://www.dekamer.be/FLWB/PDF/54/1752/54K1752009.pdf>
- 38 Op cit: <https://www.reuters.com/article/us-europe-attacks-belgium-saudi-insight/giving-up-control-of-brussels-mosque-saudi-arabia-sends-a-signal-idUSKBN1FW0R3>
- 39 [Own translations] Wikileaks, 'Saudi Cables', <https://wikileaks.org/saudi-cables/doc34490.html> ; <https://wikileaks.org/saudi-cables/doc62205.html> ; Cendrowicz, Leo, 'Brussels attacks: How Saudi Arabia's influence and a deal to get oil contracts sowed seeds of radicalism in Belgium', *The Independent*, 23 March 2016; <https://www.independent.co.uk/news/world/europe/brussels-attacks-saudi-arabia-influence-oil-contracts-sowed-seeds-radicalism-belgium-great-mosque-a6745996.html> ;
- 40 [Own translation] Wikileaks, 'Saudi Cables', <https://wikileaks.org/saudi-cables/doc70893.html> ; Op cit <https://www.independent.co.uk/news/world/europe/brussels-attacks-saudi-arabia-influence-oil-contracts-sowed-seeds-radicalism-belgium-great-mosque-a6745996.html>
- 41 S.2040 - 114th Congress (2015-2016): Justice Against Sponsors Of Terrorism Act ; <https://www.congress.gov/bill/114th-congress/senate-bill/2040>
- 42 United States District Court Southern District of New York Complaint ; <https://www.documentcloud.org/documents/3520635-Ashton-v-KSA-2017.html>
- 43 McGlinchey, Brian P, 'Veterans Say Organizers Concealed Saudi Sponsorship Of Their Trip To Dc To Lobby For Changes To 9/11 Lawsuit Legislation', *28Pages.org*, 23 February 2017; <https://28pages.org/2017/02/23/exclusive-veterans-say-organizers-concealed-saudi-sponsorship-of-their-trip-to-dc-to-lobby-for-changes-to-911-lawsuit-legislation/>
- 44 KSA Mission EU newsletter, November 2016; <http://ksaembassy.be/wp-content/uploads/2016/11/15112016-KSAMISSIONEUNEWLETTER-7-V4.pdf>
- 45 Alahmed, Abdulrahman S, *Euractiv*, 22 November 2016; <https://www.euractiv.com/section/justice-home-affairs/opinion/us-legislation-risks-eroding-international-sovereignty/>
- 46 Ibid.
- 47 Op cit: http://www.europarl.europa.eu/doceo/document/E-8-2016-007796_EN.html
- 48 Norton, Ben, Salon, "'Monstrous and irreversible injustice': Human rights groups, experts condemn

repression by Saudi Arabia', 5 January 2016
https://www.salon.com/2016/01/05/monstrous_and_irreversible_injustice_human_rights_groups_experts_conde_mn_repression_by_saudi_arabia/ ; p 314 *The State of the World's Human Rights 2016/17*, Amnesty International, <https://www.amnesty.org/download/Documents/POL1048002017ENGLISH.PDF>

49 'Arab Coalition Hires Burson Marsteller', *Intelligence Online* Issue 779, 22 March 2017 ;
<https://www.intelligenceonline.com/corporate-intelligence/2017/03/22/arab-coalition-hires-burson-marsteller.108226970-art>

50 'Saudi-led Islamic military alliance: counterterrorism or counter Iran?', DW.com, 26 November 2017;
<https://www.dw.com/en/saudi-led-islamic-military-alliance-counterterrorism-or-counter-iran/a-41538781>

51 Lobbyfacts record for Burson Marsteller's Transparency Registry entry 2016;
<https://lobbyfacts.eu/representative/a2d60de0381747b0b5942a7d5d60723f/burson-marsteller;>
For 2017;
<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=9155503593-86>

52 Merrill, Jamie, 'Saudis hire world's biggest PR firm to push 'Muslim Nato'', *Middle East Eye*, 26 April 2017; <https://www.middleeasteye.net/news/pr-firm-draws-criticism-over-saudi-deal-represent-muslim-nato-1485534964>

53 Letter, Office of the Advisory Committee on Business Appointments, 17 January 2017,
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/616537/170103_Letter_to_PH_-_BM.pdf

54 Advisory Committee on Business Appointments, Summary of business appointments applications - Vice Admiral Peter Hudson, updated 16 July 2018; <https://www.gov.uk/government/publications/hudson-peter-commander-nato-maritime-command/summary-of-business-appointments-applications-vice-admiral-peter-hudson>

55 James, Sam Burne, 'Burson Plans Defence and Security Sector Push with Former Nato Commander', *PR Week*, 2 June 2017; <https://www.prweek.com/article/1435297/burson-plans-defence-security-sector-push-former-nato-commander>

56 Linked In, Denni Abbot; <https://www.linkedin.com/in/dennis-abbott-66310214/?originalSubdomain=be>

57 Op cit; <https://www.middleeasteye.net/news/pr-firm-draws-criticism-over-saudi-deal-represent-muslim-nato-1485534964>

58 Efile FARA US Justice Department, Burson Marsteller contract 27 January 2017;
<https://efile.fara.gov/docs/6227-Exhibit-AB-20170127-8.pdf>; Update to the contract, which contains more information about what BM did for its client in the US: <https://efile.fara.gov/docs/6227-Supplemental-Statement-20170731-5.pdf>

59 KSA Mission EU, 'Islamic Military Alliance Hold First Meeting in Saudi Arabia', 27 March 2016;
<http://ksaembassy.be/en/islamic-military-alliance-hold-first-meeting-saudi-arabia/>

60 Thornberry, Emily, 'The famine facing Yemen is a war crime – it must be investigated', *The Guardian*, 22 November 2018; <https://www.theguardian.com/commentisfree/2018/nov/22/famine-yemen-war-crime-civilians-saudi-coalition>

61 'Saudi Arabia: increased repression bring scrutiny', Human Rights Watch, 17 January 2019;
<https://www.hrw.org/news/2019/01/17/saudi-arabia-increased-repression-brings-scrutiny>

62 KSA Mission EU website, 'KSRelief's Supervisor General Al Rabeeah on Saudi Arabia's Humanitarian Aid & Relief Program', 21 October 2016; <http://ksaembassy.be/en/ksreliefs-supervisor-general-al-rabeeah-saudi-arabias-humanitarian-aid-relief-program/>

63 KSA Mission EU website, 'Saudi Arabia presents its Humanitarian Aid & Relief Program', 19 October 2016; <https://ksaembassy.be/saudi-arabia-presents-humanitarian-aid-relief-program/>

64 KSA Mission EU website, 'Infographics: Saudi Aid & Relief in Yemen', 14 May 2017;
<http://ksaembassy.be/infographics-saudi-aid-relief-yemen/>

65 KSA Mission EU newsletter, 'Saudi Humanitarian Action in Yemen', February 2017;
<http://ksaembassy.be/wp-content/uploads/2017/02/KSAMISSIONEUNEWLETTER-2017-Special-YemenEdition.pdf>

66 Joint Motion for a Resolution on the humanitarian situation in Yemen (2017/2727(RSP), 14 June 2017,
<http://www.europarl.europa.eu/sides/getDoc.do?type=MOTION&reference=P8-RC-2017-0407&language=EN#>

67 Seligman, Lara, 'Starvation and Child Soldiers: On the Ground in Yemen', *Foreign Policy*, 9 October 2018 <https://foreignpolicy.com/2018/10/09/starvation-and-child-soldiers-in-yemen/>; Save the Children press release, 20 November 2018, <https://www.savethechildren.org/us/about-us/media-and-news/2018-press-releases/yemen-85000-children-may-have-died-from-starvation>

68 KSA Mission EU website, 'Saudi Arabia supplies Medicines to Battle Cholera in Yemen', 24 May 2017;
<http://ksaembassy.be/en/saudi-arabia-supplies-medicines-battle-cholera-yemen/>

69 Kennedy, Jonathan, 'Blame the Saudis for Yemen's cholera outbreak – they are targeting the people', *The Guardian*, 2 August 2017; <https://www.theguardian.com/global-development/2017/aug/02/blame-saudi-coalition-for-yemen-cholera-outbreak>

70 Ibid.

71 KSA Mission EU website, 'Houthi rebels continue to recruit child soldiers in Yemen', 2 March 2017;
<http://ksaembassy.be/en/houthi-rebels-continue-recruit-child-soldiers-yemen/> ;

72 Op cit. <https://foreignpolicy.com/2018/10/09/starvation-and-child-soldiers-in-yemen/>

73 Kirkpatrick, David D, 'On the Front Line of the Saudi War in Yemen: Child Soldiers From Darfur', *New York Times*, 28 December 2018; <https://www.nytimes.com/2018/12/28/world/africa/saudi-sudan-yemen-child-fighters.html>

74 KSA Mission EU White Paper, 'Saudi Arabia and the Yemen Conflict', April 2017; <https://ksaembassy.be/en/white-paper-saudi-arabia-yemen-conflict/>

75 European Parliament resolution of 25 February 2016 on the humanitarian situation in Yemen (2016/2515(RSP); <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2016-0066+0+DOC+XML+V0//EN>

76 Aries, Quentin & McAuley, James, 'European Parliament passes resolution urging arms embargo on Saudi Arabia', *Washington Post*, 25 October 2018; https://www.washingtonpost.com/world/europe/european-parliament-passes-resolution-urging-arms-embargo-on-saudi-arabia/2018/10/25/cb324140-3172-4dc8-b373-4acc065fdb69_story.html?utm_term=.5d0a73781720

77 KSA Mission EU website, 'UK High Court confirms Saudi Arabia's respect for the principles of International Humanitarian Law', 13 July 2017; <http://ksaembassy.be/en/category/defence/>

78 CAAT website, 'Judicial Review - Stop Arming Saudi', updated 19 December 2018; <https://www.caat.org.uk/campaigns/stop-arming-saudi/judicial-review>

79 KSA Mission EU newsletter, 'NEOM and the Future Investment Initiative: a vision for the future', November 2017; <http://ksaembassy.be/wp-content/uploads/2017/11/KSA-in-Focus-November.pdf>

80 'Loujain Al-hathloul: Saudi Women's Driving Activist Arrested', BBC.com, 6 June 2017; <https://www.bbc.com/news/world-middle-east-40171306>

81 'France and Germany agree to coordinate arms sales', *Middle East Eye*, 27 October 2018; <https://www.middleeasteye.net/news/france-and-germany-agree-coordinate-arm-sales-saudi-arabia-1568435835>

82 'French Foreign Minister Alliot-Marie Quits Over Tunisia', BBC.com, 27 February 2011, <https://www.bbc.com/news/world-europe-12591452>

83 Her amendments aimed to considerably weaken the motion for a resolution. Just one example is her proposal to change from "Urges the Commission publicly to exclude companies engaging in such activities from EU procurement procedures, from research and development funding and from any other financial support," to "Urges the Commission annually to compile a list of companies that work with countries that commit violations of human rights". [European Parliament](http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2016-0066+0+DOC+XML+V0//EN) Committee on Foreign Affairs, 27 March 2015, Amendments 1 - 176 <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2016-0066+0+DOC+XML+V0//EN>

84 European Parliament Delegation for relations with the Arab Peninsula Mission Report, 21 November 2017; <http://www.europarl.europa.eu/cmsdata/150447/1139953EN.pdf>

85 KSA Mission EU Newsletter November 2017 ; <http://ksaembassy.be/wp-content/uploads/2017/11/KSANovfrontpage.png>

86 Rachida Dati MEP website, press release 1 October 2016; <https://www.rachida-dati.eu/communiqués/deplacement-de-rachida-dati-au-royaume-d-arabie-saoudite-du-1er-au-3-octobre-2016>

87 Parliamentary questions, 17 October 2016 E-007796-16, Question for written answer E-007796-16 to the Commission (Vice-President/High Representative), Rule 13, Rachida Dati (PPE), VP/HR - EU Position on the Adoption of the JASTA Bill, http://www.europarl.europa.eu/doceo/document/E-8-2016-007796_EN.html

88 Mustafa, Abdullah, 'Jubeir: We Will Work with US, Europe to Eliminate ISIS from Libya', *Asharq Al-Awsat*, 23 February 2018; <https://aawsat.com/english/home/article/1184661/jubeir-we-will-work-us-europe-eliminate-isis-libya>

89 European Parliament resolution on the situation in Yemen (2018/2853(RSP), 3 October 2018, <http://www.europarl.europa.eu/sides/getDoc.do?type=MOTION&reference=P8-RC-2018-0444&language=EN>

90 European Parliament resolution of 25 October 2018 on the killing of journalist Jamal Khashoggi in the Saudi consulate in Istanbul (2018/2885(RSP), <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2018-0434+0+DOC+XML+V0//EN&language=EN>

91 KSA Mission EU website, '50 Years of Partnership', July 2017; <http://ksaembassy.be/wp-content/uploads/2017/07/Photo-Album-KSAMissionEU.pdf>

92 Ibid.

93 Watts, Jonathan & Doherty, Ben, 'US and Russia ally with Saudi Arabia to water down climate pledge', *The Guardian*, 9 December 2018; <https://www.theguardian.com/environment/2018/dec/09/us-russia-ally-saudi-arabia-water-down-climate-pledges-un>

94 ABLCC website, 'Saudi Arabia - Belgium Business Forum, "Vision 2030: Towards a Smart Partnership"', November 2017; <https://www.ablcc.org/news-events/in-the-spotlight/527-saudi-arabia-belgium-business-forum-vision-2030-towards-a-smart-partnership>

95 Holmes, Paul, 'A UK media 'sting' raises ethical issues', *The Holmes Report*, 6 December 2011; <https://www.holmesreport.com/latest/article/a-uk-media-sting-raises-ethical-issues>

96 McCauley, Kevin, 'Does Publicis Really Want Saudi Arabia as a Client?', *O'Dwyers PR*, 12 Oct 2018; <https://www.odwyerpr.com/story/public/11443/2018-10-12/does-publicis-really-want-saudi-arabia-as-client.html>

97 EU Transparency Register Code of Conduct, http://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=CODE_O

F. CONDUCT