

**Submission to Public Consultation on a Code of Conduct for persons carrying on
lobbying activities**

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What do you consider should be included in a Code of Conduct for persons carrying on lobbying activities?

What do you consider should not be included in a Code of Conduct for persons carrying on lobbying activities??

Do you think the Code of Conduct should contain different provisions in relation to different descriptions of persons carrying on lobbying activities?

Yes – as explained below

Any other comments, views or suggestions?

A new feature of lobbying efforts has been created by some campaigning organisations forming close relationships / networks with politicians and ministers. These relationships or networks give them access to politicians and ministers in subtle ways that appear to be under the radar of the Lobbying Act. Two examples are:

1. The Irish Family Planning Association (IPPA) provides the secretariat for the All Party Oireachtas Interest Group on Sexual and Reproductive Health and Rights.

Whilst the IPPA has a very obvious interest in such matters, this very close and unusual working relationship / network with politicians gives it un-rivalled access to promote its campaigning policies.

A recent example of such under-cover lobbying was the campaign to repeal the 8th Amendment to the Constitution when the IPPA, as a leading campaign group, had an inside track unlike other organisations which were campaigning in a transparent manner for the retention of that Amendment.

The IPPA – which is affiliated to Planned Parenthood International Federation – has been in receipt of funding from Irish Aid for a number of years for a health and sexual rights project in Bolivia, and for many years it has made submissions to various public consultations on Ireland’s overseas aid programme which is debated regularly in the Houses of the Oireachtas. Again, its very easy and non-transparent access to politicians and ministers gives it an inside track in lobbying and campaigning in pursuit of its policies on the overseas aid programme.

2. The National Womens’ Council of Ireland provides the secretariat for the The Oireachtas Women's Caucus.

Again, whilst the NWCI has a very obvious interest in the agenda of the Caucus, this unusual and very close working relationship / network with politicians gives it un-precedented access to promote its campaigning messages, in addition to receiving over 60% of its funding from the state.

Like with the IPPA, a recent example of such under-cover lobbying was the campaign to repeal the 8th Amendment to the Constitution where the NWCI, as a leading campaign group, had an inside track unlike other organisations which were campaigning in a transparent manner for the retention of that Amendment. The benefit to the NWCI and the extent of that inside track was illustrated after the referendum when the Minister for Health specifically advised NWCI of his plans and time-line for legislation following the passage of the referendum.

I suggest that this non-transparent method of lobbying politicians and ministers should be included in the Code of Conduct.

As it happens under-cover in a non-transparent way and to the dis-advantage of other campaigning/lobby groups promoting opposing policies to these two privileged organisations, I believe that it warrants special attention by the authorities if Ireland is serious about real transparency in lobbying.