



Regulation of Lobbying in 2016

Annual
Report



Coimisiún um Chaighdeán in Oifigí Poiblí
Standards in Public Office Commission

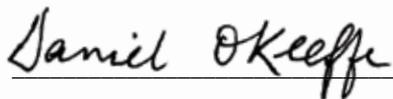
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Foreword

The Standards in Public Office Commission (the Commission) was established in 2001, and serves as the Registrar of Lobbying. This report deals with the Commission's activities during 2016 as Registrar of Lobbying and in overseeing the Regulation of Lobbying Act 2015.

In accordance with the provisions of section 25(1) of the Regulation of Lobbying Act 2015, I am pleased to submit the Annual Report for 2016 of the Standards in Public Office Commission on the Regulation of Lobbying to be laid before each House of the Oireachtas.

A handwritten signature in black ink that reads "Daniel O'Keefe". The signature is written in a cursive style and is positioned above a thin horizontal line.

Justice Daniel O'Keefe
Chairperson
Standards in Public Office Commission
June 2017

The Standards in Public Office Commission

The Standards in Public Office Commission is an independent body established in December 2001 by the Standards in Public Office Act 2001. The Commission has supervisory responsibility under separate sets of legislation. This annual report covers the Commission's activities in respect of the Regulation of Lobbying Act 2015. The Commission issues a separate annual report covering its activities in administering its other statutes.

There are six members of the Commission. The Commission is chaired by a former Judge of the High Court, Mr Justice Daniel O'Keefe. The other members of the Commission during 2016 were:

- **Justice Daniel O'Keefe** Chairperson, Former Judge of the High Court
- **Peter Finnegan** Clerk of Dáil Éireann
- **Deirdre Lane** Clerk of Seanad Éireann (until 21 October 2016)
- **Martin Groves** Clerk of Seanad Éireann (from 10 November 2016)
- **Seamus McCarthy** Comptroller and Auditor General
- **Jim O'Keefe** Former member of Dáil Éireann
- **Peter Tyndall** Ombudsman

The Office of the Ombudsman provides secretariat staff to the Commission.

Introduction by the Chairperson

Under the Regulation of Lobbying Act (the Act), the Commission is responsible for maintaining the online Register of Lobbying (the Register), for providing guidance about the operation of the Act, for carrying out decision-making functions provided for in the Act, for overseeing compliance with the provisions of the Act, and, with effect from 1 January 2017, is responsible for investigating relevant contraventions of the Act and administering the appropriate sanctions.



Justice Daniel O'Keeffe
Chairperson

Returns to the Register in 2016

The first reporting deadline for those lobbying Designated Public Officials (DPOs) was 21 January 2016. Those who undertook lobbying activities during the period of 1 September – 31 December 2015 were required to register and submit returns to the Register by 21 January 2016. More than 1,100 organisations and individuals registered and over 2,500 returns were submitted to the Register by the first returns deadline. There have been three subsequent reporting periods during 2016.

I commented in the immediate aftermath of the first reporting deadline that the overall level of compliance was a very positive indicator that there is an acceptance of the need for openness and transparency in lobbying. This was further reflected in the number of registrations and returns received in respect of subsequent reporting periods. While recognising that there are some areas and sectors which may require further outreach by the Commission, the Commission is, nevertheless, pleased and encouraged with the level of compliance achieved during 2016, the first full year of the operation of the Act.

The Commission's focus during 2016 was to continue to build understanding and encourage compliance with the Act. This approach and the significant efforts involved in establishing and implementing the new regulatory system have yielded positive results with over 1,600 individuals and organisations registered and over 14,000 returns of lobbying activities submitted to the Register as of June 2017. These strong early results are a positive indicator of the acceptance of the regulation of lobbying among those who have obligations under the Act. They are also a testament to the user-friendliness of the system, to the effectiveness of the Commission's outreach strategy, and to the level of engagement by key stakeholders, including both lobbyists and lobbied.

The Commission is very encouraged with progress made during 2016 in implementing the new Act. The information now available on the register provides the Irish public with a valuable insight into the role that lobbying plays in shaping policy and funding decisions. I was pleased to note that when launching the public consultation process for the first review of the Act, the Minister for Public Expenditure and Reform, Mr Paschal O'Donohoe TD, commented on the success of the online system and the high levels of compliance.

Commencement of enforcement provisions

In keeping with the incremental approach to implementing the new regulatory regime the Minister announced on 11 July 2016 that Part 4 of the Act, which provides for enforcement provisions, would commence on 1 January 2017.

I welcome the introduction of the Act's enforcement provisions. These provisions provide the Commission with the necessary supports to ensure the Act's effective implementation. Further details regarding the enforcement provisions and the Commission's preparation for the commencement of these provisions is provided in Chapter 5 of our report.

Review of the operation of the Act

Under section 2 of the Act, the first review of the operation of the Act was required to commence by 1 September 2016. The Act provides that the Minister must undertake a consultation process to include the Commission, Oireachtas Committees, persons carrying on lobbying and bodies representing them and any other persons as appropriate. The report of the review should cover the findings, conclusions drawn from these findings and any recommendations for amendments to the legislation consequent on these findings. Subsequent reviews are required every three years.

The Minister launched the review process on 31 August 2016. The Commission provided a submission to the Minister which was based on the experience it had acquired over the first year of administering the Act. Further details regarding the review process and the Commission's submission are provided in Chapter 5 of our report.

I wish to thank my fellow members of the Commission for their contributions during the year. I would also like to thank each of the members of the Advisory Group on the Regulation of Lobbying which was established by the Minister in 2015. Contributions from the Group were very helpful in assisting the Commission in addressing key implementation issues arising from the establishment of the Register.

I also want to thank Ms. Sherry Perreault and the Lobbying Regulation Unit for their hard work over this past year in establishing and implementing the new regulatory regime.

All members of the Commission and the Lobbying Regulation Unit are cognisant of the importance of lobbying regulation and will continue to develop and refine education and information tools in order to promote knowledge and understanding of the Act. At the same time the Commission will seek to implement the enforcement provisions and sanctions as set out in Part 4 of the Act.

Statement by the Head of Ethics and Lobbying Regulation

The second annual report on the Regulation of Lobbying Act provides a timely opportunity to take stock of progress in the continued implementation of the Act over the past year, to provide an update on key developments and look ahead to where we need to go.

I am pleased to say that the implementation of the Act continues to go well. The regulation of lobbying – still a relatively new phenomenon in Ireland – has been widely accepted as a necessary and useful tool to ensure transparency and accountability in public sector decision making.

The obligations under the Act commenced on 1 September 2015. Part 4 of the Act, which provides the Commission with the authority to enforce the Act, commenced on 1 January 2017. It was always intended that enforcement provisions would not come into effect until a full year after the commencement of the Act. This incremental approach to the commencement of the Act has allowed for an extended period of time for people to familiarise themselves with their obligations prior to the coming into effect of enforcement provisions.

As was the case during the previous year, 2016 was marked by a number of “firsts”: the first returns deadline, the first applications for consent under the Act’s delayed publication and post-employment provisions, the first annual report, the launch of the first legislative review of the Act and the first anniversary of commencement. Just as importantly, however, it was marked by other, much more significant, statistics: after three reporting deadlines in 2016, there were more than 1,500 registrants in the system representing a wide range of sectors and interests, and more than 11,000 returns on the register, figures that have continued to increase in 2017 as noted in the chairperson’s introduction.

The commencement of the Act’s enforcement provisions on 1 January 2017 provides the Commission with additional mechanisms to support effective implementation. A new Investigations Unit has been created to support the Commission in this regard. However, encouraging compliance in the first instance is and must continue to be a key priority.



Ms Sherry Perreault
Head of Ethics and Lobbying Regulation



Irish Times. Wednesday, June 29, 2016.

Other priorities in the year ahead include continuing to raise awareness of the Act and its requirements to a broader audience. We will continue to reach out to potential registrants, particularly targeting counties and sectoral interests that may be under-represented on the Register. We will enhance education efforts aimed at improving compliance with deadlines and ensuring that returns are meaningful. We will also continue to refine existing guidance as needed. And above all, we will seek to administer the Act in a fair, consistent and clear manner.

I would be remiss if I did not thank the team of the Lobbying Regulation Unit and the broader Commission Secretariat for their excellent work in supporting the Commission in their responsibilities over the past year. Their efforts are greatly appreciated by both Commission members and myself.

5,500 returns under lobbying rules

■ Some confusion persists over process introduced in 2015

Evelyn Ring

Over 1,300 individuals and organisations submitted more than 5,500 returns since new lobbying rules were introduced last year, it has emerged.

People who lobby designated public officials are required to register and report on their lobbying activities every four months.

In its first annual report on the Regulation of Lobbying Act, published yesterday by the Standards in Public Office Commission, it said it was pleased with the response so far.

Commission chairman, Daniel O'Keeffe, said: "The results we have seen to date are a very positive indicator

that there is an acceptance of the need for openness and transparency in lobbying."

The Regulation of Lobbying Act, that commenced last September, is aimed at making the lobbying process more transparent.

However, the commission, an independent body established in 2001 by the Standards in Public Office Act, has found some areas where confusion over the act's requirements persists.

There was some uncertainty over determining whether a communication counted as lobbying and ensuring that returns submitted were meaningful and contained sufficient detail.

Also, there is an obligation for registrants to submit a return for every relevant

period, including a "nil return" for periods during which they did not lobby.

Head of lobbying regulation, Sherry Perreault, said the report marked a significant milestone in the evolution of ethics law in Ireland.

Ms Perreault said 1,338 registrants had made 5,548 returns to date, and it was clear their efforts to build awareness and understanding had resulted in the high level of registration and

returns. "While we are very pleased with the early results, there is still work to be done to ensure that all those lobbying are aware of their obligations under the act," she said.

The six-member commis-

Irish Examiner. Wednesday, June 29, 2016.



Chapter 1

Role of the Commission in Regulating Lobbying

Chapter 1 – Role of the Commission in Regulating Lobbying

In addition to establishing and overseeing a web-based public Register of Lobbying, the Act provides that the Commission will:

- monitor compliance with the legislation;
- examine reports of inaccurate, out of date or misleading information on the Register and remove any information from the register which the Commission believes to be inaccurate, out of date or misleading;
- decide on requests to delay publication of information contained in a registration or a return of lobbying activity;
- decide on requests to waive or reduce the post-employment cooling off period for specific categories of DPOs subject to it;
- develop and oversee a code of conduct;
- provide guidance and promote understanding of the Act;
- investigate and prosecute contraventions of the legislation;
- administer the issuing of fixed payment notices for late returns, and
- make annual reports to the Oireachtas.

Further information regarding the Act and the Commission's legislative functions are provided in Appendix 1 to this Report.



Connacht Tribune. Friday, September 02, 2016.



Chapter 2

Registrations and Returns

Chapter 2 – Registrations and Returns

The Act commenced with effect from 1 September 2015. The first return period (“relevant period”) was 1 September – 31 December 2015. Returns for this period were required to be submitted by the “relevant date” of 21 January 2016. Subsequent relevant periods and relevant dates for returns of lobbying activities carried out during 2016 were as follows:

- returns of lobbying activities carried out during the period 1 January – 30 April 2016 were required to be submitted by 21 May 2016;
- returns of lobbying activities carried out during the period 1 May – 31 August 2016 were required to be submitted by 21 September 2016, and
- returns of lobbying activities carried out during the period 1 September – 31 December 2016 were required to be submitted by 21 January 2017.

The Commission is reporting on returns received in respect of the first four reporting periods.

Number of registrations and returns received in respect of each relevant period

The table below sets out the number of registrations at the end of each relevant period and the number of returns which were received in respect of each relevant period by the relevant deadline. The number of returns received also includes “nil” returns. It should be noted that some registrants submitted more than one return. Equally some registrants may not have submitted a return for a relevant period. (Prior to 1 January 2017 there was no sanction for failing to submit a return of lobbying.)

Table: Breakdown of registrations and returns for first four relevant periods

Relevant Period (Relevant date)	No. of registrations registered (cumulative)	No. of returns received (for the period)
1 Sept – 31 Dec 2015 (21 January 2016)	1045	2740
1 Jan – 30 Apr 2016 (21 May 2016)	1245	1990
1 May – 31 Aug 2016 (21 September 2016)	1427	2887
1 Sep – 31 Dec 2016 (21 January 2017)	1565	3437

*This is the number of registrations at the relevant dates for each of the registered periods (21 January 2016, 21 May 2016, 21 September 2016 and 21 January 2017)

The Commission noted some common errors and misunderstandings arising with regard to Applications to Register and submissions of returns as follows:

Applications to register

- a number of individuals and voluntary organisations who were outside the scope of the Act registered in error;
- a number of persons (primarily individuals and voluntary organisations) registered in relation to communications which did not concern a “relevant matter”;
- a number of persons who had carried out lobbying activities on behalf of a business, company or other organisation had registered in an individual capacity;
- a number of persons provided personal contact details where it was evident that contact details relating to the person’s business or main activities (as required under section 11 of the Act) should have been provided;

Returns of lobbying activities

- when submitting a return a person must include all communications relating to the subject matter of the return during the relevant period. A number of persons submitted separate returns in respect of each lobbying activity or communication which took place on the same subject matter during the relevant period;
- a number of persons submitting returns included communications with public officials who were not DPOs, and
- persons submitting a return must be specific as to what they communicated about and the intended results of their communication. In a number of cases persons submitted returns where information regarding their lobbying activities was neither meaningful nor specific (e.g. “to raise matters of interest”; “to highlight our concerns” etc.).

Where the Commission considered that a person may not have been required to register the Commission contacted the person to confirm whether the person was within the scope of the Act and that a lobbying activity had been carried out. If the person was not required to register, the person could seek to have their registration and return deleted from the Register. Incorrect registrations and returns were deleted in accordance with section 13 of the Act.



Clare Champion. Friday, January 22, 2016.

Where the Commission considered that the information contained in an application to register or a return of lobbying activities was inaccurate or misleading or not sufficiently detailed the Commission requested (again under section 13 of the Act) that the person amend their application or return as the case may be.

The Commission has revised its Frequently Asked Questions (FAQs) document and has produced two specific guidance notes on its website to help counteract some of the more common mistakes made when submitting applications to register or returns of lobbying activities.

The content and performance of the online register is kept under review both from a user's perspective and from the Commission's perspective as administrator to ensure that it is operating as effectively as possible. The first registrations and returns submitted had highlighted some areas of the online register which were causing difficulties for registrants. During the summer of 2016 the Commission carried out further development work on the Register. This helped to improve both the user experience and the Commission's own administration of the Register. This development work was completed in time for submissions of returns in respect of the relevant period 1 May – 31 August 2016.



Irish Independent Business. Thursday, January 28, 2016.



Chapter 3

Operations

Chapter 3 – Operations

Section 25(2) of the Act requires that the following information be included in this report:

- Any determinations made under section 14 made or in force that year (delayed publication requests);
- Any investigations carried out under section 19 and concluded in that year;
- Any applications for consent made under section 22 (post-employment restrictions) and all decisions on such applications, made in that year;
- Any convictions for offences under section 20 in that year, and
- Any fixed payment notices served under section 21 in that year.

This information must be provided in a form which does not enable the identification of the persons involved.

Internal procedures and appeal processes

The Commission has put in place internal procedures and protocols to support decision-making in accordance with its statutory responsibilities under the Act, and to provide guidance to staff in fulfilling their responsibilities in a fair, consistent and efficient manner. The Commission has also put in place procedures and protocols to support its investigative and enforcement role under the Act.

Determinations under section 14

Under section 14 of the Act, a person may apply to delay publication of the information contained in the person's registration or in their return of lobbying activities if making the information could reasonably be expected to:

1. have a serious adverse effect on the financial interests of the State, the national economy or business interests generally or the business interests of any description of persons (an application made under section 14(1)(a) of the Act), or
2. cause a material financial loss to the person to whom the information relates or prejudice seriously the competitive position of that person in the conduct of the person's occupation, profession or business or the outcome of any contractual or other negotiations being conducted by that person (an application made under section 14(1)(b) of the Act).

If an application is made under section 14(1)(a), the Commission is required to consult with any relevant Minister(s) of the Government. The Commission is not required to consult with a Minister(s) if an application is made under section 14(1)(b).

Table 2: Applications to delay publication of registration details

Descriptor	Outcome	No. of applications
Total applications received		7
Registered in error (misunderstanding of the requirements of the Act)	Registration deleted	4
Misunderstood the delayed publication provisions	Registration published	3

Table 3: Applications to delay publication of returns of lobbying activities

Descriptor	Outcome	No. of applications
Total applications received		11
Delayed publication request approved	Publication delayed	2
Delayed publication request denied	Returns published	1
Misunderstood delayed publication provisions	Returns published	1
Applications withdrawn – no explanation provided	Returns published	3
Returns submitted in error	Returns deleted	4

The following is the position with regard to the three applications to delay publication of returns on which the Commission made a determination under section 14 of the Act.

- One of the applications was deemed to have been made under both sections 14(1)(a) and 14(1)(b). The Commission consulted with the relevant Minister of the Government and considered the Minister's views. The Commission was satisfied that the application met the criteria set out in section 14(1)(b) and that publication of information contained in the return could reasonably be expected to prejudice seriously the outcome of negotiations being conducted by the person. The Commission determined, therefore, that publication of information contained in the return of lobbying activities should be delayed for the maximum period of six months.
- The second application was deemed to have been made under section 14(1)(b). The Commission was not required to consult with any Minister of the Government. The Commission was satisfied that the application met the criteria set out in section 14(1)(b) and that publication of information contained in the return could cause a material financial loss to the person. The Commission agreed to delay publication of the information contained in the return for a period of three months.
- The third application was also deemed to have been made under section 14(1)(b). The Commission was not satisfied that the application met the criteria set out in section 14(1)(b). It did not consider that publication of information contained in the return of lobbying activities would in itself cause a material financial loss to the person or would prejudice seriously the outcome of negotiations being conducted by the person. The application to delay publication was, therefore, denied. The decision was not appealed and the return of lobbying activities was published.

Investigations under section 19 of the Act

Section 19 provides the Commission with the authority to conduct investigations into possible contraventions of the Act. The provisions of section 19 did not commence until 1 January 2017. No investigations, therefore, were carried out under section 19 during 2016.

Applications for consent under section 22 of the Act

Section 22 of the Act provides that specific categories of DPOs (Ministers, Ministers of State, special advisors and senior public officials who have been prescribed for the purposes of section 6(1) of the Act) are subject to a one-year “cooling-off” period, during which time they cannot engage in lobbying activities in specific circumstances, or be employed by, or provide services to, a person carrying on lobbying activities in specific circumstances. The cooling-off period is the period of one year from the date the person ceased to be a DPO.

The circumstances in which section 22 of the Act applies are the making of communications comprising the carrying on of lobbying activities which:

1. involve any public service body with which the person was employed or held an office or other position in the year prior to his/her leaving, or
2. are to a person who was also a DPO who was employed or held an office or other position with that public service body in the year prior to the person’s leaving.

A person subject to the one-year cooling-off period may apply to the Commission for a reduction or waiver of the cooling-off period. When considering applications for consent under section 22 of the Act the Commission will consult with the applicant, his/her former employer, his/her prospective employer (or the person they intend to provide services to) and with any other person the Commission considers appropriate. The Commission may also consider:

- the nature of and responsibilities associated with the person’s role as a DPO;
- the nature of and responsibilities associated with the person’s proposed role in his/her new employment or contract to provide services;
- any previous dealings with his/her prospective employer or clients of his/her prospective employer;
- the duration of the relevant period for which the waiver is sought;
- what measures, if any, could be put in place to sufficiently ensure that the Act’s objectives are met, and
- whether the ability to earn a livelihood was being unduly impeded by the application of the Act.

The Commission may decide to give consent unconditionally to a reduction or waiver of the cooling-off period or may decide to give consent with conditions attached. The Commission may decide to refuse the application for all or part of the cooling-off period.

Under section 23 of the Act a person who is aggrieved by a decision of the Commission under section 22 may appeal the Commission's decision. The Department of Public Expenditure and Reform has established panels of independent appeal officers to hear such appeals. Under section 23 the appeal is referred to an independent appeal officer who may uphold a decision of the Commission, or overturn it and replace it with another decision.

Applications for consent received in 2016

The Commission received two applications for consent under section 22 of the Act during 2016.

Case No. 1

The applicant had been a special adviser in a Government Department and was seeking to be employed by a company on the Register that had previously carried out lobbying activities with that Department. The applicant was seeking to waive the final eight months of the cooling-off period in order to take up this employment.

The Commission was satisfied to grant a waiver for the final eight months of the cooling-off period. The waiver was subject, however, to a number of conditions which were designed to ensure that that the person could not carry on lobbying activities in circumstances set out in section 22.

No appeal was received in this particular case.

Case No. 2

The applicant had been a DPO in a local authority and was seeking to take up a position of employment with a company on the Register that had previously carried out lobbying activities with that local authority. The applicant sought consent to reduce the 12 month cooling-off period to one month.

The Commission considered that to grant the waiver sought by the applicant would not be in keeping with the objectives set out in the Act and would not be in the public interest. The Commission took into account that the person was seeking to take up employment almost immediately on leaving their previous employment. The Commission considered that this was exactly the type of situation that the provisions of section 22 are intended to regulate. The Commission considered that in order to meet the objectives of section 22 the applicant should serve an eight month cooling-off period. The Commission was satisfied to waive the final four months of the cooling-off period subject to certain conditions.

The applicant appealed the Commission's decision. The appeal was referred to an independent appeal officer. The appeal officer revoked the Commission's decision and replaced it with a new decision which allowed for a waiver of the full cooling-off period subject to certain conditions. This would have allowed the applicant to be employed by the company with immediate effect.

The Commission considered that the appeal officer had erred in law in the interpretation and application of section 22. In particular, the Commission considered that the appeal officer had failed to sufficiently appreciate and/or to accord sufficient weight to the statutory prohibition imposed by section 22 by not treating the 12-month cooling off period as the default position where an application for consent is made. The Commission appealed the appeal officer's decision to the High Court under section 24 of the Act.

The Commission and the applicant subsequently agreed that a six month cooling-off period should apply with the remaining six months subject to certain conditions. The High Court, by consent, made an order quashing the appeal officer's decision and varying the Commission's original decision to reflect the agreement.

Convictions for offences under section 20 of the Act

The provisions of section 20 commenced with effect from 1 January 2017. There were no convictions, therefore, for offences under section 20 of the Act during 2016.

Fixed Payment Notices served under section 21 of the Act

Section 21 provides that the Commission may serve an Fixed Payment Notice (FPN) to a person who has submitted a late return of lobbying activities. The provisions of section 21 did not commence until 1 January 2017. There were no FPNs served, therefore, under section 21 during 2016.



Chapter 4

Communications and Outreach

Chapter 4 – Communications and Outreach

An extensive communications and outreach strategy was developed and implemented during 2015 to ensure that all those who might have obligations under or an interest in the new Act were aware of its provisions.

Outreach activities included numerous presentations to stakeholder groups throughout Ireland, including businesses, associations, charities and DPOs, and elsewhere.

Analysis of applications to register and returns of lobbying activities for the first four return periods has allowed the Commission to identify geographical areas and business sectors where further targeted outreach may be required to raise awareness of the Act. During 2017 the Commission will be engaging in a targeted outreach programme to ensure that persons in areas and sectors which may be under represented on the Register are fully aware of the requirements of the Act.

Information tools and resources

Section 17 of the Act provides the Commission with the authority to issue guidance and to make information available for the purpose of promoting awareness and understanding of the Act. The Commission has published a series of guidelines which have been tailored to various parties with an interest in the Act. These guidelines are published on the website and are kept under review and updated as appropriate.

A FAQs document is also available on the website. This document deals with specific areas of the legislation and is informed by the Commission's responses to queries arising and the Act being interpreted in the context of real-life situations. The FAQs document is regularly updated to reflect guidance given by the Commission on particular matters and will continue to be expanded over time.

A range of other helpful information has also been published on the website, including sample returns, instructional videos and a Three Step Test to help people determine whether their activity is lobbying.

Advisory Group on the Regulation of Lobbying

An Advisory Group on the Regulation of Lobbying was established by the Minister in 2015. The Group provided valuable input on the development of the online register and on the development of communications strategies and information materials. The Advisory Group decided at its meeting in November 2016 that its key objectives had been met. The Group will, therefore, stand suspended until such time as further consultation may be needed.



Chapter 5

**Key issues in 2016
and next steps**

Chapter 5 – Key issues in 2016 and next steps

Preparations for the commencement of Part 4 of the Act – Enforcement Provisions

Commencement of Part 4

The Minister announced in July 2016 that Part 4 of the Act would commence on 1 January 2017. The provisions contained in Part 4 give the Commission the authority to investigate and prosecute relevant contraventions of the Act and to levy FPNs for late filing of lobbying returns.

Section 20(2) of the Act provides that it is an offence to fail to register or to fail to submit a return of lobbying activities while section 20(1) of the Act provides that it is an offence to submit a late return of lobbying activity. Section 21(1) of the Act provides that a person who is late submitting a return of their lobbying activities may be served with an FPN of €200.

150 agriculture-related lobbying actions recorded

AINE HENNESSY
ONLINE JOURNALIST

ahennessy@farmersjournal.ie
Farm groups are among the organisations declaring contacts with officials under new legislation on the public disclosure of lobbying activities.

The Regulation of Lobbying Act 2015, which came into effect in Ireland on 1 September 2015, requires those who lobby public officials to register and report on their political lobbying activities online at lobbying.ie.

The Irish Farmers Association (IFA), the Irish Cattle and Sheep Farmers Association (ICSA), the Irish Co-operative Organisation Society Ltd (ICOS), Macra na Feirme and the Irish Creamery Milk Suppliers Association (ICMSA) have all submitted their returns in time for last Friday's deadline for lobbying conducted between September and December 2015.

What did the farm organisations ask for?

The IFA: The IFA registered a massive 117 lobbying events. It lobbied various government departments and TDs on everything from flood defences to the Beef Data and Genomics Programme (BDGP) to hedgecutting to rural crime to supports for the sheep and tillage sectors.

The ICSA: The ICSA lodged a total of 14 lobbying events. It lobbied on issues such as the Galway Greenway cycle route, land eligibility, cross-compliance as well as permanent monitoring in meat processors.

The ICMSA: The ICMSA had 16 lobbying events. It lobbied on issues relating to TAMS, GLAS and Knowledge Transfer schemes, and improved compensation for farmers affected by TB to reflect actual income losses suffered.

Macra na Feirme: Macra registered six lobbying events. It lobbied on supports for older young farmers, and the eligibility for GLAS and the scheme's design to become relevant to young farmers.

ICOS: ICOS too has six lobbying events registered. It lobbied for the introduction of an income deferral scheme for dairy farmers, enhanced EU support measures, and greater uptake of fixed milk price schemes.

Irish Farmers Journal. Saturday, January 30, 2016.

Decision in relation to late returns for previous relevant periods

The enforcement provisions relating to non-returns and late returns would apply to registrations and returns due by the first deadline after the enforcement provisions commence (21 January 2017). Anyone undertaking lobbying activity in the relevant period 1 September - 31 December 2016 who had not registered or submitted a return of lobbying activity by 21 January 2017 would be subject to the offences and penalties for late returns and non-returns.

The Commission considered whether a late return received after 1 January 2017 in respect of a previous relevant period (i.e. 1 September – 31 December 2015; 1 January 2016 – 30 April 2016 and 1 May 2016 – 31 August 2016) should be issued with an FPN.

The Department of Public Expenditure and Reform and the Commission had consistently stated that enforcement provisions would not come into effect until a full year after the commencement of the Act. Persons could, therefore, record their lobbying activities during the first year of the operation of the Act without fear of incurring a sanction. The Commission considered that it would not be appropriate or consistent with the previously stated position to impose sanctions for activities that took place in the earlier relevant periods.

Development of processes and procedures

The Commission has established a separate Complaints and Investigations Unit to manage all investigations and prosecutions arising under the Act. It has also developed procedures for dealing with non-returns and late returns. Commission staff in cooperation with the developers of the online registration system, Dovetail Technologies Ltd., have incorporated these processes and procedures into the online system and have developed a system for the online issuing, payment and administration of FPNs.

An FPN issues automatically to anyone who submits a late return of their lobbying activities. The Commission may proceed to prosecute the offence of submitting a late return if the person does not pay the fixed payment by the date specified in the FPN. If the Commission initiates a prosecution under section 20(1) of the Act the person may be liable on conviction to a fine not exceeding €2,500.

Notifying registrants of the commencement of enforcement provisions

A significant number of individuals and organisations registered in the first year of commencement and subsequently failed to submit a return of lobbying activities for one or more relevant periods. During October and November 2016 the Regulation of Lobbying Unit contacted the majority of these registrants and advised them of the commencement of enforcement provisions and the requirement to submit returns (including nil returns) by the relevant date.

A similar email subsequently issued to all registrants in November 2016. The Commission issued further reminders by email to all registrants prior to the end of the relevant period (31 December 2016) and prior to the return date (21 January 2017). These reminders notified the registrant of the pending return deadline and the commencement of enforcement provisions on 1 January 2017. The reminder stated that if a person submitted a return after 21 January 2017 an FPN would issue to them.

The introduction of enforcement provisions and sanctions for non-returns and late returns of lobbying activities will, no doubt, present some challenges in the year ahead. The Commission will work to ensure that the processes and procedures established to administer the enforcement provisions, and the online system itself, continue to effectively support the administration of the Act. The Commission will continue to refine and develop these processes, procedures and systems as needed.

Quality of information submitted to the Register

The response to the Act and its obligations continues to be largely positive among those who are required to register and submit returns. Most registrants have had little difficulty in registering and submitting returns to the online register.

As stated earlier in this report, there were in 2016 over 1,500 applications to register and 11,000 returns of lobbying activities submitted to the Register since the commencement of the Act. The Commission does not have a role in examining applications to register and returns of lobbying activities before they are published to the Register. It is the responsibility of the registrant to ensure that the information they submit is fully compliant with the Act.

The Commission does have a role, however, in ensuring that information contained on the Register is not inaccurate or misleading. The Commission is aware that in some cases the quality of information contained in returns of lobbying activities is not as it should be. In some cases, the information is so vague as to call into question whether the person has fully met their compliance obligations under the Act.

Section 10(5) of the Act provides that a person may inform the Commission if he/she considers that information contained on the Register is inaccurate or misleading. Where it is brought to the Commission's attention that information contained in a return of lobbying activities is incorrect or misleading (whether through a report under section 10(5) of the Act or otherwise) the Commission will make any necessary enquiries.

In order to improve compliance with respect to the quality of information contained in returns, the Commission intends during 2017 to undertake a random audit of returns submitted to the Register. If it finds that information contained in a return of lobbying activities is incorrect or misleading or is not sufficiently detailed, the Commission may use its powers under section 13 to request the registrant to remove or correct the return of lobbying activity as appropriate. If the information is not corrected or removed the Commission may, under section 13(3), immediately remove the information from the Register.

Enforcement provisions for Regulation of Lobbying Act 2015

Minister for Public Expenditure and Reform, Paschal Donohoe T.D., has signed the Commencement Order for the enforcement provisions for the Regulation of Lobbying Act 2015. The enforcement provisions will take effect from 1st January 2017.

The decision to delay commencing the enforcement provisions until 2017 was made to allay any concerns that stakeholders may have had about inadvertent non-compliance with the provisions of the Act and to allow those lobbying a period of time to become familiar with their legal obligations and the registration system.

Minister Donohoe said: 'Given the success of the system, and the high levels of compliance, it is my intention to commence these provisions from January 1st 2017. It is clear that the work undertaken by my Department and the Standards in Public Office Commission (SIPO) in building awareness and understanding of the Regulation of Lobbying Act has been effective and I am confident that this momentum will be maintained as this work continues.'

The Register, which may be viewed at www.lobbying.ie, is overseen by the Standards Commission. The website, which includes the online register, also has a suite of information tools designed to help lobbyists, designated public officials and the public to fully understand the Act and its obligations.

The Public Sector Times. Wednesday, August 3, 2016.

It should be noted that if the Commission removes an application to register or return of lobbying activities from the Register under section 13 the person will be regarded as never having made the application to register or submitted the return of lobbying activities. The removal of information under section 13 may, therefore, have consequences for a person in terms of sanctions for non-returns or late returns.

Similarly it is the responsibility of a person making an application to register to satisfy themselves that they are within the scope of the Act and that they have carried out a lobbying activity as defined in the Act. As stated in Chapter 2, follow-up with registrants who had failed to submit returns highlighted that a significant number of registrants were not actually required to register.

During the first two return periods, there were over 1,200 applications to register. Given the volume it would have been impractical for the Commission to verify with each registrant whether the person was in fact required to register. The number of new applications to register received during the third and fourth registration periods was significantly lower than the first two registration periods, which is to be expected. As the volume of new registrants decreases, it will allow the Commission to give greater consideration to new applications to register. The Commission intends during 2017 to individually engage with new registrants to ensure that they are fully informed of the requirements of the Act and that they are satisfied they are required to register. It is expected that this will ensure that those on the Register are only those who are required to be.

Code of Conduct

Section 16 of the Act provides that the Commission may “*produce, and from time to time revise, a code of conduct for persons carrying on lobbying activities with a view to promoting high professional standards and good practice*”. With the recent commencement of the enforcement provisions the Act is now fully operational. It is the Commission’s view that it is important to allow sufficient time for all provisions to be well established before undertaking to develop a Code of Conduct. Accordingly, the Commission will look to commence research and consultations on the development of the Code by the end of 2017.

Review of the operation of the Regulation of Lobbying Act

Requirements of section 2 of the Act

Section 2 of the Act provides that the Minister shall review the operation of the Act before the end of each “relevant period”. The first “relevant period” was 12 months from the commencement of the Act. Subsequent reviews are required every three years.

The Minister must undertake a consultation process to include the Commission, persons carrying on lobbying and bodies representing them and any other persons as the Minister considers appropriate. The review must also take into account any relevant report of an Oireachtas Committee. Following the review the Minister may consider possible amendments to the Act.

The Minister must report to the Houses of the Oireachtas on the outcome of the review and any recommendations for amendments to the Act. The report must be furnished within six months of the end of the “relevant period”.

First Review

The Minister launched the review process on 31 August 2016. The Commission made an extensive submission to the review, based on its experience of the first year of administering the Act. The Commission's submission included a number of recommended changes which in the Commission's opinion, if implemented, would strengthen and help clarify the Act. Some of the recommendations made by the Commission are as follows:

- i. the scope of the Act should include representative bodies with less than one full-time employee and should also include informal coalitions of bodies;
- ii. where an organisation is within scope of the Act, any lobbying activities carried out on behalf of the organisation which are made by a person who holds office in the organisation (for example a Chairperson or member of the board of directors) should be included in the organisation's return of lobbying activities irrespective of whether the person making the communication is remunerated or not;
- iii. the list of DPOs should be expanded to include senior staff in influential public bodies that do not currently have any officials designated. This should be done before extending the list to lower levels in the Civil Service;
- iv. contravening the provisions of section 22(1) of the Act in relation to the "cooling-off" period should be included as a relevant contravention in section 18 of the Act;
- v. the Commission should have the authority to publish reports of any investigations carried out under section 19 of the Act, and
- vi. DPOs should be required to decline further meetings with persons where the DPO is aware that the person has failed to report previous lobbying activities and the Commission should have the authority to instruct a DPO to refuse to have further contact with a person who has been convicted of a relevant contravention.

The Commission's submission is attached as Appendix 2 to this report.

The Minister's report on the results of the legislative review was published on the Department's website on 2 May 2017. In a press release announcing the publication of the report, the Department noted that *"given the short time since commencement of the Act, it would be prudent to allow further time for the system to establish itself, and for additional evidence regarding how the operation of the Act is proceeding to be gathered and assessed...it is not recommended that any amendment be made to the Act at this stage."*

The Commission is disappointed that none of the recommendations it proposed have been accepted. While the Commission agrees that the Act is generally operating well, it is of the view that the implementation of the recommendations proposed in its submission would strengthen and clarify the Act. The Commission will look ahead to the next review, scheduled for 2019, as a further opportunity to explore any issues relating to the Act's administration.

The Commission will continue to identify opportunities to raise awareness and understanding of the Act in order to promote compliance. In ensuring the effective administration of the Act, the Commission will strive to support transparency and good governance in Irish public life.



Appendices

Appendix 1: Standards in Public Office Commission – legislative functions

The Commission has a supervisory role under four separate pieces of legislation:

- the Ethics in Public Office Act 1995, as amended by the Standards in Public Office Act 2001, (the Ethics Acts);
- the Electoral Act 1997, as amended, (the Electoral Acts);
- the Oireachtas (Ministerial and Parliamentary Offices) (Amendment) Act 2014, (the Parliamentary Activities Allowance Act), and
- the Regulation of Lobbying Act 2015.

Overview of the Regulation of Lobbying Act 2015

General Overview

The Regulation of Lobbying Act 2015 (the Act) provides that a person who falls within the scope of the Act makes a *relevant communication* (is lobbying) if the person communicates with a *Designated Public Official about a relevant matter*. Anyone lobbying must register and submit regular online returns of their lobbying activity.

Section 5(1) and (2) of the Act sets out the categories of person who are within scope of the Act, namely:

- a person with more than 10 full-time employees;
- a representative body which has one or more full-time employees and the relevant communications are made on behalf of any of the members;
- an advocacy body which has one or more full-time employees and the relevant communications are concerned with any of these issues;
- any person (individual or organisation) making a “relevant communication” concerning the development or zoning of land which is not their principal private residence, and
- a “professional lobbyist” who is paid to carry on lobbying activities on behalf of a person who fits within one of the categories of persons above.

DPOs include Ministers and Ministers of State, Members of Dáil Éireann and Seanad Éireann, Members of the European Parliament for Irish constituencies, and members of local authorities. DPOs also include special advisors and the senior-most civil and public servants who have been designated by Ministerial Order.

A relevant matter is one that concerns the initiation, development or modification of any public policy or of any public programme; the preparation of an enactment; or the award of any grant, loan or other financial support, contract or other agreement, or of any licence or other authorisation involving public funds. Matters relating to the zoning and development of land are also relevant communications.

Section 5(5) of the Act provides for a number of exemptions to what is considered a relevant communication.

The Register

The Register itself is a web-based system. The website, www.lobbying.ie, serves as the first stop for anyone seeking to register, to submit returns or simply to search for information about lobbying regulation. In addition to housing the Register, the website includes information and guidance tools explaining the registration and return processes.

There is no cost to register, to submit returns or to access the information contained therein. While the Commission has oversight responsibility for the establishment and maintenance of the Register, the content is driven by the information contained in the registrations and returns submitted by registrants.

Anyone who is lobbying must register and submit returns three times per year, covering prescribed “relevant periods” (1 January – 30 April, 1 May – 31 August, and 1 September – 31 December). The returns must be submitted by the respective prescribed “relevant dates” (21 May, 21 September and 21 January, respectively).

The return must indicate who was lobbied, the subject matter of the lobbying activity and the results the person was seeking to secure. The returns must also indicate the type and extent of the lobbying activity. If the lobbying activity was carried out on behalf of a client the return must provide details of the client.

Other Provisions

The Act also provides that specific classes of DPOs (namely Ministers and Ministers of State, special advisors and senior public and civil servants) are subject to a one-year post-employment cooling-off period, during which they must not engage in specific lobbying activities.

The Act contains a number of investigative and enforcement provisions which were commenced on 1 January 2017. It also provides for an independent appeal mechanism for certain decisions / determinations made by the Commission under the Act in relation to reports of incorrect information; delayed publications and applications to waive the one year cooling-off period.

Finally section 2 of the Act provides for a legislative review. Following the review the Minister may consider possible amendments to the Act. The Minister must report to the Houses of the Oireachtas on the outcome of the review and any recommendations for amendments to the Act.

Statutory Instruments under the Regulation of Lobbying Act

Six statutory instruments have been introduced under the Act, namely:

- Regulation of Lobbying Act 2015 (Commencement) Order (S.I. 152 of 2015);
- Regulation of Lobbying Act 2015 (Appeals) Regulations 2015 (S.I. 366 of 2015);
- Regulation of Lobbying Act 2015 (Designated Public Officials) Regulations (S.I. 367 of 2015);
- Regulation of Lobbying Act 2015 (Commencement) Order 2016 (S.I. 360 of 2016);
- Regulation of Lobbying Act 2015 (Fixed Payment Notice) Regulations 2016 (S.I. 361 of 2016), and
- Regulation of Lobbying Act 2015 (Designated Public Officials) Regulations 2016 (S.I. 362 of 2016).

Appendix 2: Legislative Review of the Regulation of Lobbying Act 2015: Recommendations made by the Standards in Public Office Commission in its submission

For the full text of the Commission's submissions, see:

<https://www.lobbying.ie/about-us/legislation/legislative-review-of-the-regulation-of-lobbying-act-2015-submission-by-the-standards-in-public-office-commission/>

<p>Final – 14 September 2016</p> <p>APPENDIX: Summary of Recommendations</p> <ol style="list-style-type: none">1. It is recommended that the Act be amended to explicitly address representative bodies with fewer than one full-time employee and informal coalitions.2. It is recommended that the Act be amended to explicitly include third parties lobbying in relation to zoning and development and require the disclosure of the client's identity.3. It is recommended that the Act be amended as follows: any relevant communications on behalf of an organisation that falls within scope of the Act made by any person who holds office in the organisation, regardless of whether the position is remunerated, will be considered to be made by that organisation and must be included in the organisation's return of lobbying activities.4. It is recommended that the Act be amended to exempt communications made by political parties to their designated public official members in their capacity as members of the party.5. It is recommended that the Act be amended to exempt submissions that are published by a public body, regardless of when such publication takes place. Subsection 5(3)(c) of the Regulation of Lobbying Act could read "communications requested by a public service body that have been or will be published by it".6. It is recommended that the exemption in section 5(3) of the Act be clarified.7. It is recommended that consideration be given to expanding the list of designated public officials to include senior staff in influential public bodies that have heretofore not had any officials designated, before extending it to lower levels.8. It is recommended that any designation of Principal Officers as designated public officials be made on a case by case basis according to delegated authority.9. It is further recommended that the position of Head of Lobbying Regulation be explicitly exempted from the list of designated public officials.10. It is recommended that section 6 be amended to require that the list of designated public officials maintained by public bodies also include those officials who meet the definition in section 4(2)(b) that is special advisers appointed under section 11 of the Public Service Management Act. <p>16</p>	<p>Final – 14 September 2016</p> <ol style="list-style-type: none">11. It is further recommended that public bodies be required to update and publish their online lists of designated public officials at least three times per year, before the end of each relevant period (i.e. 30 April, 31 August, 31 December).12. It is recommended that the Act be amended to include explicit guidelines for the retention and destruction of information in the public register.13. It is recommended that subsections 18(1)(g) and 21(5)(d) be amended to read "...any e-mail address, telephone number and website address relating to the person's business or main activities".14. It is further recommended that section 11(b) be amended in line with section 11(a) to include "main activities".15. It is recommended that section 16 be modified to require that the Commission consult with interested stakeholders in developing the Code of Conduct, and to lay the Code before the Oireachtas.16. It is recommended that section 16 be modified to give the Commission authority to issue guidance on the Code of Conduct, and to conduct inquiries into and report on breaches of the Code.17. It is recommended that contravening section 22(1) should be added to the list of relevant contraventions in section 18 of the Act.18. It is recommended that an anti-avoidance clause be added to the list of relevant contraventions in section 18 of the Act.19. It is recommended that the Act be amended to give the Commission the authority to make investigation reports public.20. It is recommended that the Act be amended to introduce obligations for DPOs to decline further meetings with persons where the DPO is aware that the lobbyist has failed to register previous lobbying activities by the relevant date.21. It is recommended that the Commission have the authority to order any DPO to refuse to have dealings with a lobbyist who has been convicted of a relevant contravention.22. It is recommended that the Commission have the authority to investigate breaches of the provisions outlined in recommendations 20 and 21. <p>17</p>
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<p>Final – 14 September 2016</p> <ol style="list-style-type: none">23. It is recommended that section 6(4) of the Act be amended to include the requirement for public bodies to inform the Standards Commission before the end of every relevant period of the relevant bodies that are meant to be adhering to the Transparency Code. <p>18</p>

Summary of Recommendations

1. It is recommended that the Act be amended to explicitly address representative bodies with fewer than one full-time employee and informal coalitions.
2. It is recommended that the Act be amended to explicitly include third parties lobbying in relation to zoning and development and require the disclosure of the client's identity.
3. It is recommended that the Act be amended as follows: any relevant communications on behalf of an organisation that falls within scope of the Act made by any person who holds office in the organisation, regardless of whether the position is remunerated, will be considered to be made by that organisation and must be included in the organisation's return of lobbying activities.
4. It is recommended that the Act be amended to exempt communications made by political parties to their designated public official members in their capacity as members of the party.
5. It is recommended that the Act be amended to exempt submissions that are published by a public body, regardless of when such publication takes place. Subsection 5(5)(e) of the Regulation of Lobbying Act could read "communications requested by a public service body that have been or will be published by it".
6. It is recommended that the exemption in section 5(5)(l) of the Act be clarified.
7. It is recommended that consideration be given to expanding the list of designated public officials to include senior staff in influential public bodies that have heretofore not had any officials designated, before extending it to lower levels.
8. It is recommended that any designation of Principal Officers as designated public officials be made on a case by case basis according to delegated authority.
9. It is further recommended that the position of Head of Lobbying Regulation be explicitly exempted from the list of designated public officials.
10. It is recommended that section 6 be amended to require that the list of designated public officials maintained by public bodies also include those officials who meet the definition in section 6(1)(e), that is special advisers appointed under section 11 of the Public Service Management Act.
11. It is further recommended that public bodies be required to update and publish their online lists of designated public officials at least three times per year, before the end of each relevant period (i.e. 30 April, 31 August, 31 December).
12. It is recommended that the Act be amended to include explicit guidelines for the retention and destruction of information in the public register.
13. It is recommended that subsections 11(1)(d) and 12(5)(d) be amended to read "... any e-mail address, telephone number and website address relating to the person's business or main activities".

14. It is further recommended that section 11(b) be amended in line with section 11(c) to include “main activities”.
15. It is recommended that section 16 be modified to require that the Commission consult with interested stakeholders in developing the Code of Conduct, and to lay the Code before the Oireachtas.
16. It is recommended that section 16 be modified to give the Commission authority to issue guidance on the Code of Conduct, and to conduct inquiries into and report on breaches of the Code.
17. It is recommended that contravening section 22(1) should be added to the list of relevant contraventions in section 18 of the Act.
18. It is recommended that an anti-avoidance clause be added to the list of relevant contraventions in section 18 of the Act.
19. It is recommended that the Act be amended to give the Commission the authority to make investigation reports public.
20. It is recommended that the Act be amended to introduce obligations for DPOs to decline further meetings with persons where the DPO is aware that the lobbyist has failed to register previous lobbying activities by the relevant date.
21. It is recommended that the Commission have the authority to order any DPO to refuse to have dealings with a lobbyist who has been convicted of a relevant contravention.
22. It is recommended that the Commission have the authority to investigate breaches of the provisions outlined in recommendations 20 and 21.
23. It is recommended that section 6(4) of the Act be amended to include the requirement for public bodies to inform the Standards Commission before the end of every relevant period of the relevant bodies that are meant to be adhering to the Transparency Code.

Appendix 3: Statistics

Figure 1: Number of registrations

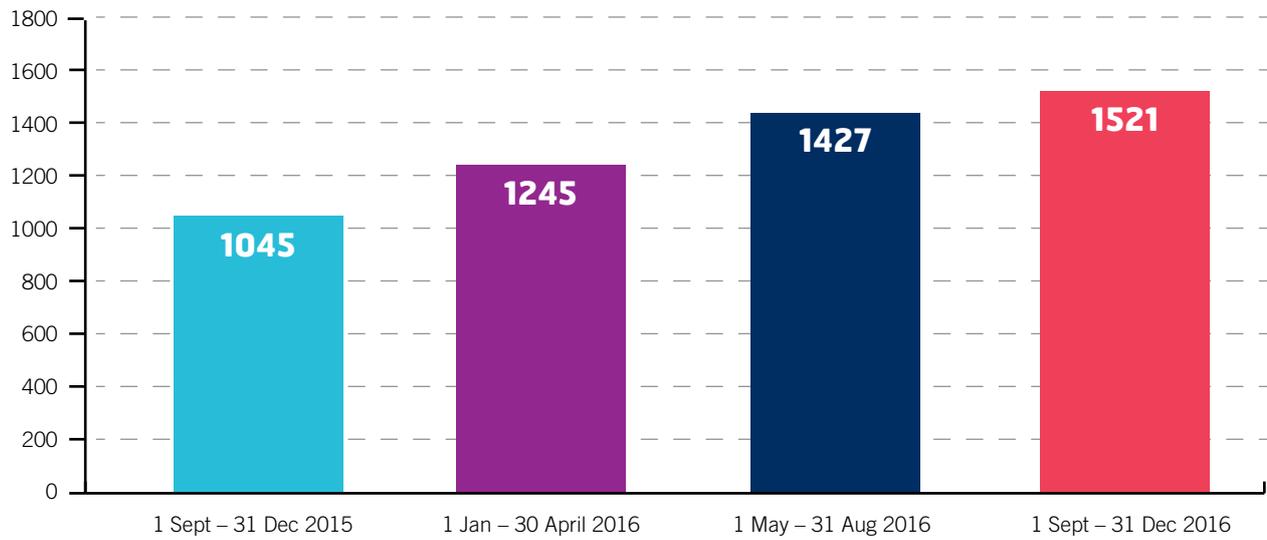


Figure 2: Number of returns received

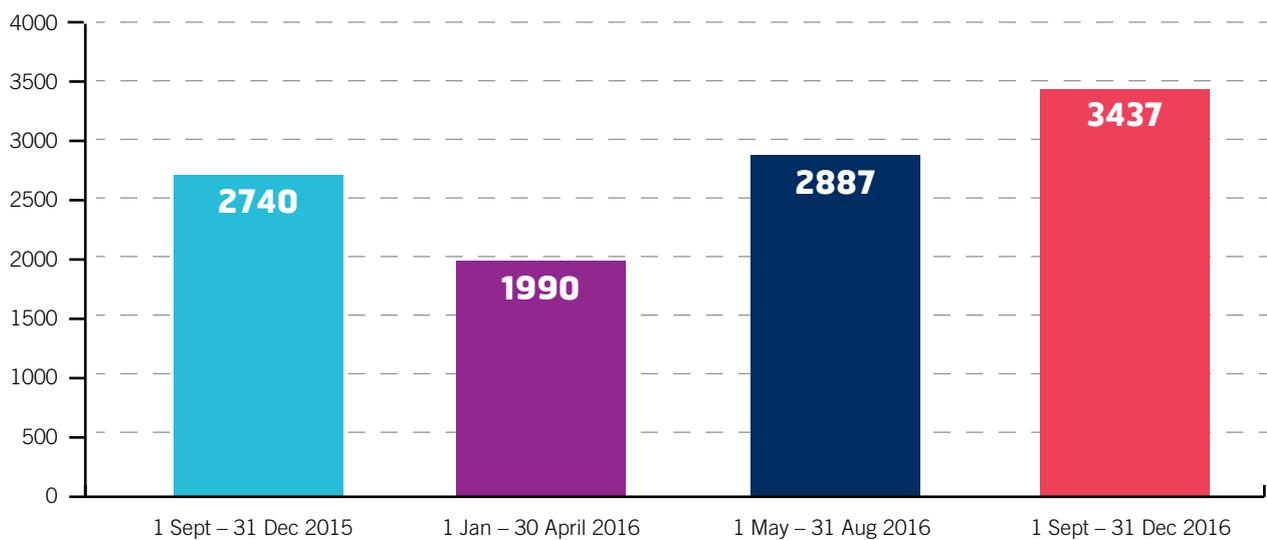


Figure 3: Breakdown by public policy area in 2016

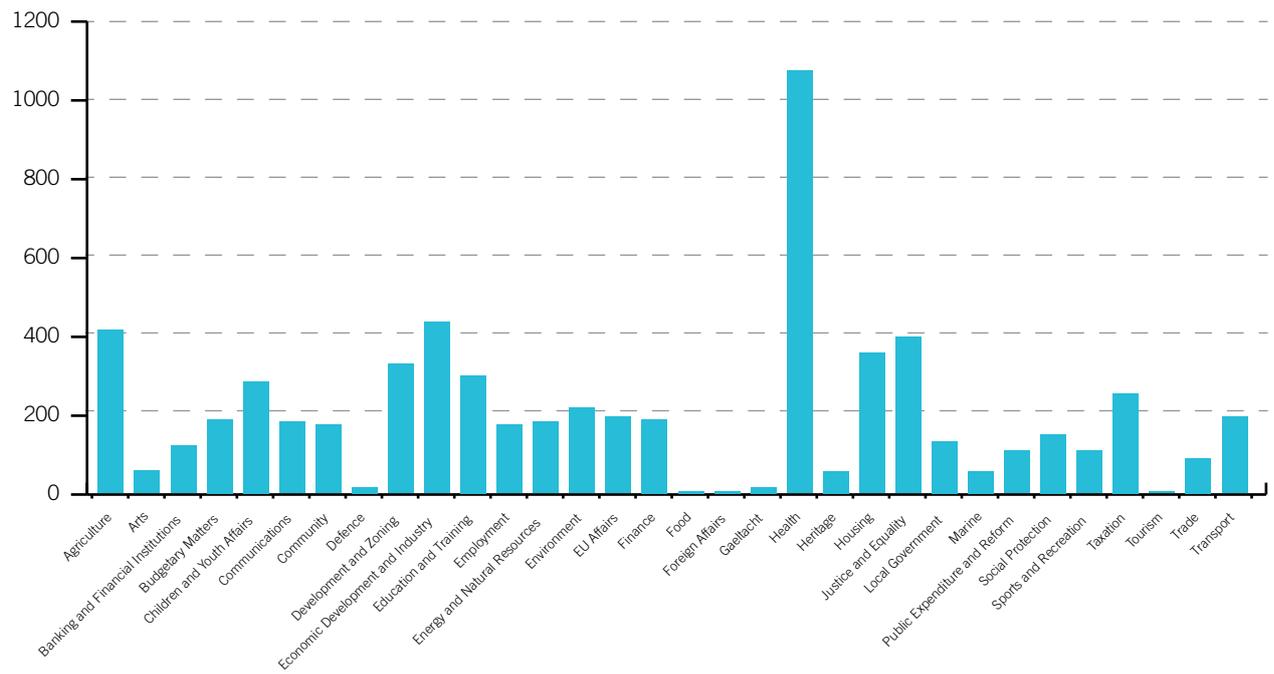
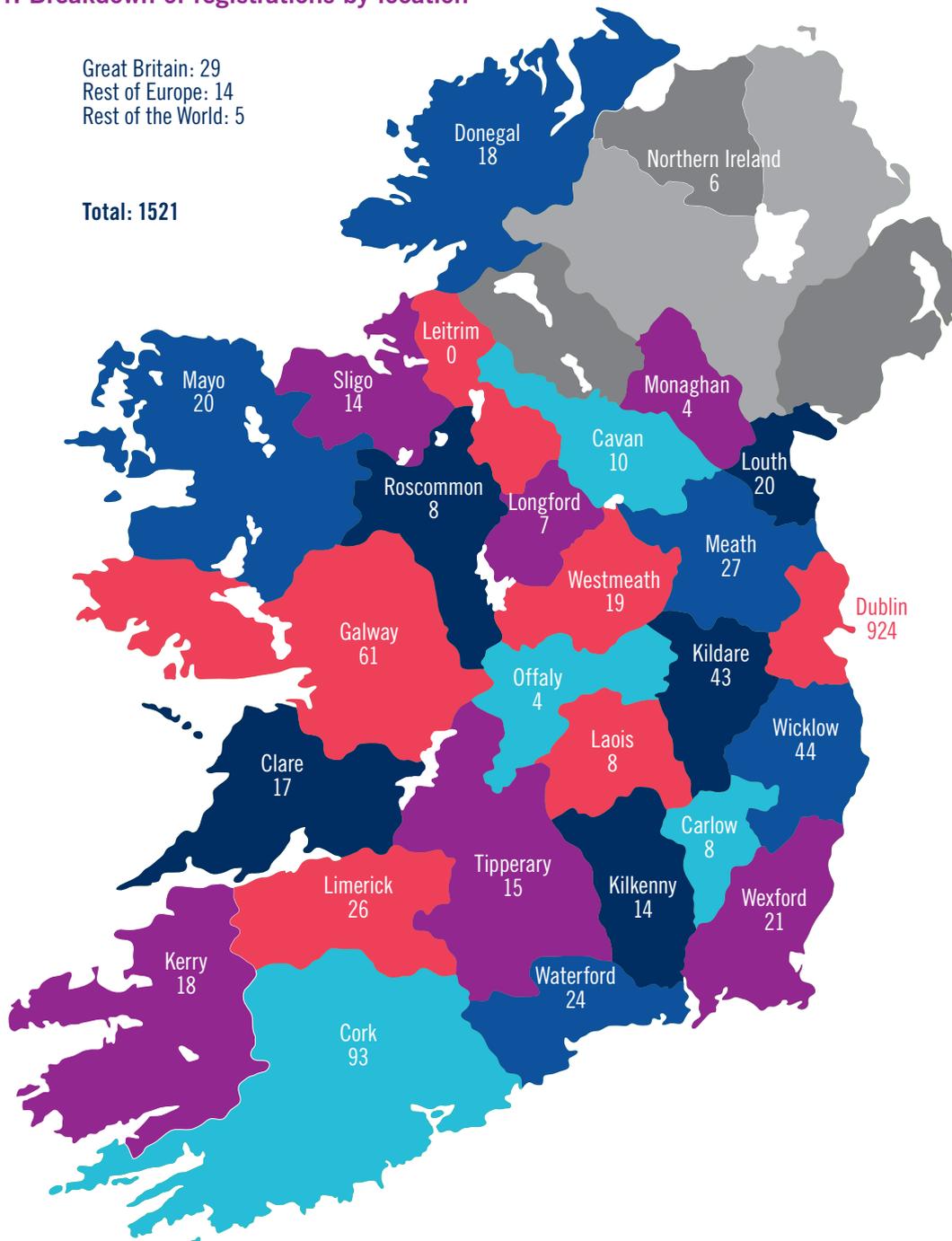


Figure 4: Breakdown of registrations by location



The Commission notes with concern the low level of registrations in several counties. While it is not surprising that Dublin, as the national capital city, has the most registrations (at 60.75%), it is surprising that a number of counties have single digit numbers of registrations. As DPOs include local authority members and senior staff as well as TDs, Senators and others, it is to be expected that all counties would have lobbying activities taking place at a local level and a significantly higher number of registrations.

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