

Mr Aidan Moore
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27 July 2018

Re: Code of Conduct /Regulation of Lobbying Act 2015

Dear Aidan,

The American Chamber of Commerce Ireland fully supports the work of the Standards in Public Office Commission relating to the Regulation of Lobbying Act 2015 and welcomes the opportunity to make a submission to the consultation on the draft Code of Conduct for persons carrying on advocacy activities.

The American Chamber supports the stated objective that the Code *“will provide principles by which persons carrying on lobbying activities may conduct their lobbying activities, in order to ensure that the lobbying activities are carried out transparently and ethically”*. Adopting a principles-based approach is the appropriate approach given the broad scope of persons and activities that the Act encompasses.

The American Chamber wish to make two observations on the practical implementation of the principles, notably Principle 4 - The Disclosure of identity and Purpose of Lobbying Activities:

- 1) **Disclosure:** The existing guidelines for DPO’s to identify themselves is not consistently observed in communications and engagements. Having to check during an interaction, or subsequently, adds to the compliance obligations of those making returns to the Commission.
 - **Recommendation:** That guidance to DPO’s to identify themselves should be applied consistently by all DPO’s from their appointment to their role falling under the ambit of the current regime e.g. by the identification of DPO status on business cards, email signature, website listing etc.
- 2) **DPO Listing Records:** Organisation charts on the Websites of Government Departments, Local Authorities and Public Bodies that fall within the scope of the Act may not be up to date. This makes it difficult for those carrying out advocacy activities to ensure they have fully documented all relevant interactions with DPOs.
 - **Recommendation:** Government Departments, Local Authorities and Public Bodies that fall within the scope of the Act should be required to maintain accurate public-facing records of their DPOs.

The American Chamber looks forward to seeing how this Draft Code of Conduct for persons carrying on advocacy activities evolves. As stated above, however, to easily and effectively implement the principles as set out, this requires the involvement of Government Departments, Local Authorities and Public Bodies that fall within the scope of the Act.

The American Chamber remains available to the Standards Commission to discuss the abovementioned points as required.

Yours sincerely,



Brian Cotter
Public Affairs Director