

Appendix 1

Template submission response form.

Name of the individual making the submission (e.g. Tom Cleary, Anne Dunne)	Siobhan Masterson, Head of Corporate Affairs, Ibec
Name of the organisation that you are affiliated to (e.g. IBEC)	Ibec
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

PLEASE NOTE THAT THE ADDRESS, PHONE NUMBER AND E-MAIL ADDRESS WILL NOT BE RELEASED AS PART OF DPERs INTENTION TO PUBLISH THE CONTENT OF ALL THE SUBMISSIONS THAT IT RECEIVES.

What are the positive features of the Act?

Positive features of the Regulation of Lobbying Act are as follows:

- Introduces transparency
- Correctly identifies issues and activity as a measurement
- Accessible for the general public and provides an appropriate level of detail
- Provides strong reputational value for lobbyists
- Supports transformation and profesionalistion of lobbying in Ireland
- Strengthens ethics and conduct around engagement with senior decision makers

Does the Act fulfil the objectives it sets out to achieve?

The Regulation of Lobbying Act achieves its objectives for the reasons outlined in the previous section however further awareness raising of obligations under the Act needs to take place.

Have any unintended consequences occurred, in your view?

There is currently no evidence of the occurrence of unintended consequences.

Do you think the Act can be improved in any way and, if so, how?

The Regulation of Lobbying can be improved by:

- Investing in the technical tools for users of the lobbying register to ensure efficiency and compliance along with greater attention to challenges experienced in particular by users making a large number of returns.
- Real time updating of all designated public official details on the register to ensure strong compliance and removal of duplication of the names of designated public officials who have taken up new roles or who have left office. Auto population of Designated Public Officials is currently problematic and in many cases details are very out of date.
- Driving an increase in awareness of the Act through The Standards in Public Office Commission so that all stakeholders have a strong understanding of obligations under the legislation.
- Ensuring consistent clarification from government in relation to stakeholder meetings/events/working groups as to whether they are covered under the transparency code therefore removing the obligation to make a register.
- Regular convening of the Lobbying Act Advisory Board

What suggestions for changes, if any, would you make?

- Upgrade and investment in the technical tool to comply with the legislation to meet the specific and unique challenges for large users.
- Engagement with key stakeholders should takes place to ensure that investment in technology is appropriate
- Real time updating of Designated Public Officials to ensure a well-functioning auto population facility and minimizing errors.
- A renewal of awareness raising among stakeholders.
- Reconvene the Board to ensure ongoing dialogue on the operationalization of the legislation.

Please include in your submission:

- * Specific examples from your own experience which back up your position, where you are making points regarding the Act, and
- * Reasons for any suggestions for changes or improvements to the Act, and enough and appropriate current evidence / data / examples to support these suggestions.