





| SUBMISSION<br>NUMBER | NAME | AFFILIATION |
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Appendix 1

Template submission response form.

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| Name of the individual making the submission (e.g. Tom Cleary, Anne Dunne)           | Michael Mc Loughlin   |
| Name of the organisation that you are affiliated to (e.g. IBEC)                      | Youth Work Ireland  |
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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?

The act provides increased transparency in relation to lobbying activities particularly by business and for profit concerns.

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

We believe the above benefit needs to be weighed up against the increased burden and compliance workload on not for profits who engage in lobbying

Have any unintended consequences occurred, in your view?

As above normal day to day communication by smaller charities in relation to their not for profit work is treated the same as large regulatory lobbyists connected to for profit activity

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

We do believe the act is yet another compliance burden particularly for small organisations

We think there should be a different definition and process for "not for profit" lobbying. We don't have a schema for this but suggest DPER consult and involve the sector on it. It should recognise the fundamentally different nature of the work of not for profits

It would also need to exclude and be able to deal with trade associations and those seeking to work around the regulation of "for profit lobbying" and all these issues would need teasing out but we maintain that such a distinction and consequent reduction in the compliance burden is needed

Greater synergy may be possible with FOI legislation in relation to the above

There is a discrete issue about returns often falling due on week-end days

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

Decision makers and public officials appear to have very limited obligations under the act, it seems to us the burdens of compliance and regulation should be more evenly spread

Unfortunately we do not have time to provide the information below but our submission is fully based on the experience of ourselves and our members as registered bodies

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 sufficient and appropriate current evidence / data / examples to support these suggestions.