

Irish Medical Organisation Submission to the Department of Public Expenditure and Reform on the Regulation of Lobbyists

The IMO welcomes the opportunity to comment briefly on the Government proposals to introduce a statutory register of lobbyists and rules concerning the practice of lobbying.

The introduction of regulations aims to render political lobbying activity more transparent however few developed countries have introduced formal legislation governing lobbyists. In some cases in order to access parliament, lobbyists may be required to register at regular intervals and/or comply with a code of conduct as in the case of lobbyists requiring regular access to the EU Parliament. Other jurisdictions such as the USA and Canada have more robust legislation which also requires lobbyists to file reports detailing clients and activities undertaken. In other countries such as the UK, it is the conduct of Members of Parliament that is regulated.

What is clear from the experiences in different jurisdictions is that in order to be effective precise definitions of what constitutes both a lobbyist and lobbying activity is required. The Irish Medical Organisation (IMO) is both a trade union and a professional representative body. While collective bargaining by trade unions is generally excluded, other lobbying activity undertaken by trade unions and professional representative bodies generally requires them to register as lobbyists.

Also, if legislation is not sufficiently robust, private entities are able to hide behind the professional lobbyists they contract. On the other hand professional representative bodies have a clear mandate to represent the interests of their members and thus a requirement for a professional body to detail lobbying activities may impose an unwarranted financial and administrative burden. Legislation should differentiate between the transparent activities of professional representative bodies and the more opaque activities of professional lobbyists.