

Our Ref. 14/0108/PER

9 December 2014

vincent@csna.ie

Vincent Jennings
Chief Executive Officer
CSNA

Dear Mr Jennings,

The Minister for Public Expenditure and Reform, Mr. Brendan Howlin, T.D., has asked me to refer to your correspondence dated 25th November 2014 regarding the Registration of Lobbying Bill 2014. I have attached a copy of the latest version of this Bill as passed by the Dáil Committee Stage for your information.

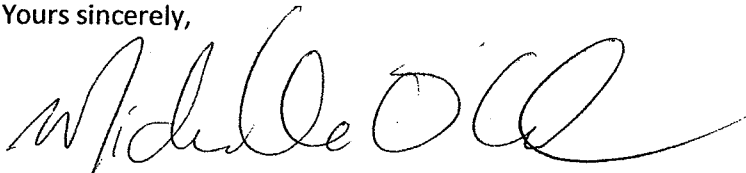
In your email you ask if the members of your Association The Convenience Stores and Newsagents Association (CSNA) would be regarded as clients and I can confirm that members of an organisation are not considered to be clients of the organisation. A body such as the CSNA, would instead be regarded as a representative body and covered by section 5(1)(b) and 5(2)(b) of the Bill.

Under section 5(1)(b) and 5(2)(b) where you make, manage or direct the making of relevant communications on behalf of one or more members you as an association would be required to register. The particular instance you describe, where an organisation would ask members to speak to elected representatives on particular issues, would be considered as a "grassroots campaign". The Association, rather than the members, would be required to register as the Association has directed the making of the relevant communications.

There is no requirement in the Bill for your Association to provide details of its members.

As you note in your email, Minister Howlin has agreed to consider further the amendment put forward by Deputy Flemming in relation to unpaid volunteers. This matter will be discussed further at Report Stage in the Dáil which is scheduled for 14th January next.

Yours sincerely,



Michelle O'Connor
Private Secretary
Minister for Public Expenditure and Reform