

STANDARDS, PROCEDURES AND PUBLIC APPOINTMENTS COMMITTEE

INQUIRY INTO LOBBYING

SUBMISSION RECEIVED FROM SCOTTISH GROCERS' FEDERATION (SGF)

The Scottish Grocers' Federation

The Scottish Grocers' Federation (SGF) is the trade association for the Scottish Convenience Store Sector. It has almost 2,000 convenience stores in membership, including groups such as SPAR Scotland, Booker Premier, KeyStore, Nisa, Costcutter, McColl's, the Scottish Co-Operative, Scotmid and Clydebank Co-op, as well as a number of independent retailers. SGF promotes responsible community retailing and works with key stakeholders to encourage a greater understanding of the contribution convenience retailers make to Scotland's communities.

We welcome the opportunity to contribute to the Committee's inquiry – this is an issue of great importance to ourselves as an organisation and to our members. We have focused on those questions which are most relevant to our work and our members' interests and we trust the Committee will find this short submission to be helpful

Register of Lobbyists

To what extent will the introduction of a register of lobbyists address any problems or perceived problems with lobbying?

We do not believe there are any substantive problems with the existing ways in which stakeholders engage in the policy making process in Scotland and believe that, in the absence of any robust examples to the contrary, that existing safeguards appear to operate effectively. The kinds of 'cash for questions/cash for influence' scandals which have bedevilled both houses of the Westminster parliament have simply not occurred in Scotland. Therefore, we would still question the need for legislation on lobbying.

To whom would such a register apply?

We continue to have significant concerns about the proposal to include not-for-profit trade bodies within the scope of the register and indeed would continue to argue against the need to do so. It is clear that trade associations such as the SGF represent their sectors and their membership. We have always operated with complete transparency. We consider there is nothing to be gained from imposing additional requirements on small organisations such as ourselves, whose sole purpose is to advocate on behalf of our members.

We consider any individual or organisation representing themselves or the interests of the membership they clearly represent should be excluded from the register. In other words, we believe that if there is a case for a register, it should be restricted to individuals and organisations acting on behalf of third parties on a commercial or

'client' basis (what we may refer to as paid political consultants) where the identity of the beneficiary of the lobbying activity would not otherwise be apparent.

What level of information should be on it?

While we consider the case for a register is neither sufficiently strong nor robust, we support the Government's overall aim to achieve transparency in political engagement and political influencing. If the proposals are pursued we believe a light touch approach providing the minimum information necessary to achieve that transparency should be sought.

However, if trade associations are to be included within the scope of the legislation we do not believe that financial information should be included. Also, if trade associations are included it should be on as light a touch basis as possible, with much lower reporting requirements, given the greater impacts on operating costs.

We believe an **annual return** would be sufficient, which simply identifies the organisation as one which engages in lobbying, giving a brief description of the organisations aims and objectives and perhaps a named 'responsible person'.

Should thresholds be set for registration?

Financial information should not be included in any proposed register. A proposal for thresholds would not be a workable solution to the problems inherent in presenting financial information. For trade associations, itemising how resources are being used in general advancement of the membership or on specific issues and campaigns would require significant administrative resources and additional costs. It would be particularly onerous to have to record and register every single contact and meeting; this in itself would be highly costly in terms of time and resources.

We do not believe that trade associations should have to pay for registration.

How will compliance be monitored?

We would suggest that the primary goal of any register would be to clearly and simply identify those organisations which are engaged in lobbying.

Unless it was clearly established that some criminal activity had taken place directly connected to lobbying activity, we would argue that an organisation should not be 'de-registered'. Straightforward cases of administrative non-compliance should not result in de-registration.

Compliance should simply be monitored by the completion of an annual return, outlining, for example, the organisation's aims and objectives, business address, named responsible person etc.

What are the likely cost implications of registration for groups that lobby?

If the over-arching aim of the register of lobbyists is to protect the public interest then we believe that there is a strong case for it to be publicly funded, in any case we do not believe trade associations should be charged for registration.

Any additional costs deriving from either registration or compliance will impact on the organisations ability to advocate on behalf of its membership and simply add to the cost of doing business. Additional costs will in fact reduce access and participation.

Should there be a code of conduct for lobbyists?

We do not support the development of a Code of Conduct for lobbyists believing that this will only create additional administrative and cost burdens and is unnecessary given that the MSP and Ministerial Code of Conducts already regulate these relationships.

We would be very happy to discuss these issues further with the Committee. Please do not hesitate to contact me if any of our points require clarification.

**JOHN LEE
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SCOTTISH GROCERS' FEDERATION
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