

PAGE 1: About you

Q1: What's your organisation called?

Friends of the Earth Northern Ireland

Q2: What's your email address (so we can get in touch if we need to)?

niall.bakewell@foe.co.uk

Q3: Where in the UK is your organisation based (England, Wales, Scotland, Northern Ireland)?

Northern Ireland

PAGE 2: Third party campaigning

Q4: Do you agree with the Government that there is a perception of 'undue influence' by third parties during election periods? Can you name examples of when you have seen this happen in previous elections?

The obvious example is Bernie Ecclestone and the lobbying over sponsorship of sporting events by cigarette manufacturers. Corporate power of the kind exerted by big donors over political parties is mostly untouched by this legislation, yet the ability of an organisation like ASH to counter such power would be destroyed.

Q5: Where do you think the line between issue focussed campaigning and campaigning for the electoral success of a party or candidate should fall? Can you name examples? E.g. Should a document setting out what parties or candidates think about a policy issue - but not calling for the electorate to vote for a party or candidate - be caught by regulation?

An organisation's free speech should include the ability to name and shame politicians who have acted against its existing policies, and laud those who have supported it. The burden of proof that an organisation meant to nudge the outcome of an election in favour of, or against a certain political party, should be on the accuser.

Q6: Which campaigning activities do you think should be regulated? Which do you think should not be regulated? E.g. Do you think staffing costs or opinion polls should be subject to regulation?

There should be no regulation of a campaign unless it could be proven that it is attempting to influence the outcome of an election. No other campaigning should be regulated in any way it isn't already.

Q7: How do you think appropriate thresholds for registration should be judged? What threshold do you think is appropriate? For info, the Government is currently proposing changing the threshold from £10,000 to £5,000 in England, and from £5,000 to £2,000 in Scotland, Wales and Northern Ireland.

The threshold for registration should be far in excess of what the largest annual spend has ever been on a non-party campaign, and there should be no variation in the threshold between the nations of the United Kingdom.

Q8: How do you think the spending limit for non-party campaigning should be judged? Should there be a limit? What if any cap should there be? E.g. The previous limit was 5% of the political party spending limit. Do you think a proportion of political party limits is an appropriate way to decide? What other ways might there be of deciding?

Political parties have all the power, which grants them access to vast amounts of corporate and union funding, as well as thousands of hours a year of free publicity through broadcast and print media. If non-party campaign spending caps are to be relational to party caps, then it should be by orders of magnitude much larger. Non party campaigns should be allowed to spend twenty times what parties spend in a given period.

Q9: Do you think non-party campaigning in coalition should be restricted? How do you think non-party campaigners working in coalitions should be regulated?

Coalitions should be allowed to pool any resources. Otherwise they're being deliberately punished for their success and popularity.

Q10: Do you think that non-party campaigning organisations should be limited on what they can spend in a single constituency? Do you think accounting for spending in individual constituencies is workable?

Many site battles are local, and concentrations of activity would easily push a successful campaign over spending limits. Short answer - no.

Q11: Do you think that the devolved nations should have different registration thresholds and spending limits to England? How should these be set / determined? NB please specify whether your organisation campaigns in any or all of the devolved nations

We're in Northern Ireland, so a big fat no.

Q12: What should the reporting requirements for non-party campaigners be? Where should the balance between transparency and bureaucracy fall?

The balance should fall on the side of free speech, and the right to defend the public good against bad policy and legislation. Reporting requirements would strangle a small group's ability to win, and punish them for reaching a threshold of success far beneath outright victory. This tips the balance in favour of the existing elite, and must not be allowed to happen. The opaque relationship between money and power is much more important to expose than any unintended electoral consequence of a non-party campaign.

Q13: How long should the regulated period for non-party campaigning be? How should the length of this period be arrived at?

Whatever it is now. Change nothing. Non-party campaigning was not the reason this Bill was proposed, corporate lobbying was.

PAGE 3: Any final thoughts?

Q14: Please share any other thoughts your organisation has for the Commission on Civil Society and Democratic Engagement.

Kill Part 2 of this Bill, and focus instead on the murky world of corporate lobbying that has been largely left untouched by Part 1.