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Please acknowledge this submission which is being presented before the 5 p.m. cut off time on the required date, namely 23 June 2022.

I have personal experience in this regard in respect of a current situation.

I have presented my views in accordance with the Guidance in respect of submission:

My understanding of 'lobbying' describes a situation where:

- an individual or individuals / company etc is / are privy to information either as a result of previous involvement in a particular sphere, role or capacity, or
- have other access to information that would not ordinarily be available to them - and is not available to others
- that this information and / or access influences or effects a particular outcome(s)

I cannot understand that greater regulation of declaring 'personal' and 'prejudicial' conflicts - and stipulating clear mechanisms or contingencies to negate those conflicts have not been developed as a matter of urgency to date - purely recording them (conflicts) without subsequent mitigation does not protect anyone and indeed provides a false sense of reassurance - this would not suffice in any other sphere of public service.

(cf e.g. <https://www.ombudsman.wales/wp-content/uploads/2021/05/Code-of-Conduct-Guidance-Community-Councils.pdf>

Ombudsman's Guidance for LA, Town & Community Councillors)

I can understand the reluctance of course as this would mean curtailing on the benefit that involved individuals may exercise and enjoy.

This issue is a major concern to the people of Wales - if and when it becomes apparent to them. Prior to my ongoing experiences with an external Energy Developer and the research I have conducted / information I have gleaned in the last 12 months, I had naively thought that lobbying was a phenomenon associated with and limited to Westminster, and that we were better in Wales, how wrong was I.

I find it incredulous that it hasn't been identified as a feature of utmost concern to date.

The 2013 Code of Conduct and supplementary Guidance is not robust enough to provide the necessary and reasonable reassurance that justice is not only done but seen to be done, a basic requirement in preserving political integrity.

A Register of Lobbyists and a properly accountable system of declaring interests including mechanisms / contingencies and safeguards is the very basic that is needed, as currently in my opinion there exists a blatant, and real risk to the accountability and reputation of governance in Wales,

Non Davies