



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon George Eustice MP, former Secretary of State for the Department of Environment, Food and Rural Affairs. Paid appointment with the International Fugitive Emissions Abatement Association Ltd.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as Chair of the International Fugitive Emissions Abatement Association Ltd (IFEAA).
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer IFEAA. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration of the risks presented

5. You were not involved in any decisions specific to IFEAA whilst you were in office, nor is there a relationship between the organisation and your former

department. Therefore, the Committee¹ considered that the risk that this role could be seen as a reward for your decisions in office is low.

6. As the former Secretary of State for the Department of Environment, Food and Rural Affairs (Defra), you would have had access to sensitive information which may benefit IFEAA or any other research organisation with an interest in agriculture and the environment. However, Defra confirmed that all policy proposals you were involved in formulating (alongside the department for Business Energy and Industrial Strategy) have been published. Further, you have been out of office for over 13 months and there have been significant changes in government administration and policy since your time in office. Therefore, the risks associated with your access to information that could unfairly advantage IFEAA are limited.
7. As a former Secretary of State for Defra, there are risks associated with your influence and network of contacts gained within government. In particular, this is an organisation that is interested in influencing government policy and your role will be focussed on raising the organisation's profile and raising funds. The Committee therefore carefully considered if this role would be in keeping with the lobbying ban that applies to all former ministers. It is significant that you have told IFEAA that you are unable and unwilling to lobby government on behalf of its organisation, and this will not form part of your role.

The Committee's advice

8. The Committee considered the risks associated with your access to information is limited for the reasons above. Given you have been clear that the Chair's role will not involve lobbying, this role is in keeping with the lobbying ban that will be applied, reducing the risks associated with unfair influence. The main risk remaining is that you could be seen to make improper use of contacts you may have made whilst in government service to raise funds for your new employer. The Committee would therefore draw your attention to the conditions below which prevent you from making use of your contacts in office to unfairly benefit IFEAA in seeking funding/new membership fees.
9. The conditions below seek to prevent you from making use of your access to privileged information and contacts from your time in ministerial office to the unfair advantage of IFEAA and appropriately mitigate the risks identified.

¹ This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; The Rt Hon Lord Eric Pickles; and Mike Weir.

10. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **International Fugitive Emissions Abatement Association Ltd** be subject to the following conditions:

- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of International Fugitive Emissions Abatement Association Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage International Fugitive Emissions Abatement Association Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to on behalf of International Fugitive Emissions Abatement Association Ltd (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK government or any of its arm's length bodies;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing funding or membership for International Fugitive Emissions Abatement Association Ltd.

11. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests². You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary Code of Conduct. It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

² All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers

12. By 'privileged information' we mean official information to which a minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.
13. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister "*should not engage in communication with government (Ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place - with a view to influencing a government decision, policy or contract award/grant in relation to their own interests or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office.*"
14. You must inform us as soon as you take up employment with this organisation(s), or if it is announced that you will do so. Please also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
15. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

The Rt Hon Lord Pickles

Annex - Material information

The role

1. You wish to take up a paid part-time role as Chair for International Fugitive Emissions Abatement Association Ltd (IFEAA). IFEAA is a small not-for-profit research organisation based in Cornwall that develops and analyses research into fugitive (aka unintentional) emissions of methane and nitrous oxides alongside technologies that would support their capture and reduction. IFEAA's website says that it engages a broad range of stakeholders including '*...international and local and national policy makers, industry, influence groups and forums and the wider public*'.
2. You said that your role as chair will be to help IFEAA improve its profile in the climate change debate to become a fully-fledged think tank. Your key areas of responsibility will be to advise on the establishment of a broader support base, improve fundraising approaches, raise the profile of IFEAA, and change its governance. You said that you have made IFEAA aware that you are unable and unwilling to lobby Defra officials or ministers on its behalf and that has been understood.

Dealings in office

3. You said that you visited a dairy farm that was trialling new technology, developed by Bennamann - a business in Cornwall where one of the members of IFEAA worked. This was in your capacity as an MP, not a minister. You said that having an interest in potential approaches to reduce methane emissions whilst at Defra, you highlighted the technology developed by Bennamann to policy officials and also cited the work of IFEAA in a speech you delivered as Secretary of State at the Devon County Show in 2022³.
4. You said that you were involved in policies relating to emissions and the environment whilst in office, specifically those related to Net Zero. However, all proposals in which you were involved have now been published.
5. You said that you made no commercial or contractual decisions specific to IFEAA whilst in office.

Department assessment

6. Defra confirmed the details you provided in your application form, including that the only contact you had with IFEAA was as a constituency MP; and it had no relationship with the organisation.
7. Defra said that while you were Secretary of State were involved in relevant policy - on Net Zero. It considered the risk is low because relevant policy has been published via - 'Net Zero Strategy: Build Back Greener'⁴ and the Net Zero Growth Plan⁵.
8. Defra said that you would not have been involved in any funding of or contractual decisions relevant to IFEAA.
9. Defra recommended standard conditions as well as a reminder that you should not engage with any clients of IFEAA with whom you had contact whilst in office.

³ <https://www.gov.uk/government/news/more-funding-for-sustainable-farm-based-proteins-as-george-eustice-visits-innovative-farm>

⁴ <https://assets.publishing.service.gov.uk/media/6194dfa4d3bf7f0555071b1b/net-zero-strategy-beis.pdf>

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147457/powering-up-britain-net-zero-growth-plan.pdf