



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Baroness Olivia Bloomfield of Hinton Waldrist, former Government Whip, House of Lords. Paid appointment with Terrestrial Energy Inc (Terrestrial Energy).

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on an appointment you wish to take up with Terrestrial Energy as an independent contractor/consultant.
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 Terrestrial Energy. 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. Terrestrial Energy has no known relationship with government, though it is a clear stakeholder for Net Zero and energy security in the UK. You had no contact with Terrestrial Energy, nor did you make any decisions specific to the organisation whilst in office. As such, the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. As a former minister there are risks associated with your access to privileged information. In particular, the Committee¹ noted this included working with the department responsible for nuclear and energy more widely in relation to promoting and defending its policies more widely in the House of Lords.
7. As a former minister, you will have gained contacts across the UK government. There is therefore also a risk that your network and influence might be used to offer unfair access to government. This is particularly relevant given the company's interest in government policy on nuclear and energy more widely.
8. The Committee considered it is significant that you are returning to a company you worked with before joining government and your proposed role will not involve any contact or dealings with government.

The Committee's advice

9. The conditions below make it clear you cannot make use of your access to privileged information, contacts or influence gained from your time in ministerial office to the unfair benefit of Terrestrial Energy. The Committee considered these conditions appropriately mitigate the risks identified above.
10. The Committee advises, under the government's Business Appointment Rules, that your role with **Terrestrial Energy Inc** should 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 service;

¹ This application for advice was considered by: Richard Thomas; Sarah de Gay; The Rt Hon Lord Pickles; Mike Weir; The Baroness Jones of Whitchurch; and Andrew Cumpsty. Jonathan Baume and Isabel Doverty were unavailable.

- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Terrestrial Energy Inc (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 to influence policy, secure business/funding or otherwise unfairly advantage Terrestrial Energy Inc (including parent companies, subsidiaries, partners and clients); and
 - for two years from your last day in ministerial office, you should not provide advice to Terrestrial Energy Inc (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 its arm's length bodies.
11. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is your personal responsibility to understand any other rules and regulations you may be subject to in parallel with this Committee's advice.
 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.*" This Rule is separate and not a replacement for the Rules in the House.
 14. You must inform us as soon as you take up this role, or if it is announced that you will do so. You must 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 said Terrestrial Energy is a Canadian nuclear technology company, working on generation IV nuclear technology. Terrestrial Energy is a stakeholder for Net Zero and energy security in the UK. It does not receive funding directly but the UK government committed £2.9 million to establish a pilot plant under its Nuclear Fuel Fund program as part of the UK's energy security strategy.² The manufacturing and supply contract in relation to the pilot is a result of partnership between Terrestrial Energy, Westinghouse Springfields Fuels and UK National Nuclear Laboratories.
2. You said that the CEO of Terrestrial Energy Simon Irish met with Minister Bowie in DESNZ in June 2023. You said you had no involvement in arranging or participating in this conversation nor do you know of any outcomes.
3. You said as an independent contractor/consultant, you will work on an ad hoc basis to raise private capital and act as a head hunter to find suitable candidates to work for the company.
4. You said that your role will not involve any contact or dealings with government.

Dealings in Office

5. You confirmed you had had no official contact with Terrestrial Energy when you were Government Whip in the House of Lords. You noted the only official dealings in the sector were with industry trade bodies such as the Nuclear Industry Association and you:
 - did not have any involvement in any relevant policy development or decisions that would have affected Terrestrial Energy;
 - do not have access to sensitive information that would provide an unfair advantage;
 - had no commercial or contractual responsibilities relating to the Terrestrial Energy; and

²<https://www.terrestrialenergy.com/2023/08/terrestrial-energy-and-westinghouse-sign-contract-for-imsr-fuel-plant-at-springfields-with-uk-government-support/>

- did not meet with competitors of Terrestrial Energy nor have access to sensitive information regarding competitors. Although you said you did meet with industry trade bodies such as the Nuclear Industry Association.

Departmental Assessment

6. The Cabinet Office confirmed the details you provided.
7. The Cabinet Office said you did not have any particular insight from your time as Government Whip that might provide an unfair advantage to Terrestrial Energy.
8. The Cabinet Office recommended standard conditions be applied to this appointment.