

Summary of investigation

June – July 2024

Organisation or person investigated

Disruptive Nanotechnology Limited (“DNL”)

Matter(s) investigated

Whether DNL conducted unregistered consultant lobbying

Registrar’s decision

Based on information and assurances provided, DNL has not conducted unregistered consultant lobbying in relation to the matter under investigation.

Summary of rationale for decision

Based on substantive and unequivocal written information provided, DNL has not conducted unregistered consultant lobbying.

Under the Transparency of Lobbying, Non-Party Campaigning and Trade Union administration Act 2014 (“the Act”), a registrable communication is made by a VAT registered company or individual communicating with a Minister, Permanent Secretary (or equivalent) on behalf of a paying client.

DNL provided evidence that they were not registered for VAT when the communications under investigation were made and assurances that no otherwise registerable communications have been made since their VAT registration.

Chronology

Date	Action
26 June	Formal letter from the Registrar to DNL giving background on the requirement for registering and asking if its activities fall within the criteria to be registered with particular reference to, but not limited to, communications on behalf of Innova Medical Group in 2020.
8 July	Response from DNL providing evidence that they were not registered for VAT when the communications under investigation were made; and providing assurance that no otherwise registerable communications were made following registration for VAT.

Office of the Registrar of Consultant Lobbyists

Date	Action
18 July	Letter from the Registrar concluding his investigation.

18 July 2024

Office of the Registrar of Consultant Lobbyists

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