

Summary of investigation

April 2025

Organisation or person investigated

The Lord Duncan of Springbank (“Lord Duncan”)

Matter(s) investigated

Whether Lord Duncan conducted unregistered consultant lobbying

Registrar’s decision

Based on information and assurances provided, Lord Duncan 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, Lord Duncan is not UK VAT registered, whether as an individual or through a company. He has therefore not conducted unregistered consultant lobbying in relation to the matter under investigation.

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.

Chronology

Date	Action
10 April	Article in The Guardian regarding Lord Duncan’s communications with the Parliamentary Under Secretary of State at the Department for Energy Security and Net Zero.
14 April	Formal letter from the Registrar to Lord Duncan giving background on the requirement for registering and asking if activities, whether individually or through a company, fall within the criteria to be registered with particular reference to, but not limited to, the communications shown in The Guardian article.

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Date	Action
28 April	Letter from Lord Duncan giving background to his work for Terrestrial Energy Inc. This included confirmation that neither Lord Duncan nor his company were UK VAT registered.
30 April	Letter from the Registrar concluding his investigation.

30 April 2025

Office of the Registrar of Consultant Lobbyists

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