



Permanent Secretary for BIS
Martin Donnelly
Department for Business, Innovation and Skills
1 Victoria Street
London

SW1H 0ET

15 November 2013

Dear Mr Donnelly

Official Conduct

I wish to notify you of stakeholders' extreme concern that your department is failing any perception of fair or good administration in regard to the statutory civil liberty of pedlary.

Pedlars are concerned that 'in secret' another ill-conceived Statutory Instrument may imminently be signed off by the minister to avoid further consultation.

The impact of the last blunt instrument is still resounding since PSRA 2009 Section 45. All operatives refuse to engage with stakeholder's concerns. Pedlars contend that the CCP Team policy to repeal the Pedlars Act is an attempted cover-up of earlier gross negligence. Pedlars contend that there has been catastrophic failure by CCP Team operatives to comprehend the Principles that differentiate the Pedlars Act from regulation of licensed street trading.

The House of Commons Library reference paper for parliamentarians on the subject compounds the mischief by also failing to inform readers of the Principles involved and pedlars have submitted a [rebuttal](#)¹ of that document to [BIS](#)². Pedlars now ask for your direct intervention to break the CCP Team '[policy to ignore](#)'³ all communications since mid 2012. They ask that you direct all involved to engage in formal consultation about pedlars' proposed [Third Option](#)⁴ to reform and amend the Pedlars Act before pursuing BIS URN

¹ <http://pedlars.info/bis-consultation/189-hc-library-reference-paper-snha5693.html>

² <http://pedlars.info/images/stories/roberts/briefing051113.pdf>

³ <http://pedlars.info/bis-consultation/165-2-july-2013-bis-policy-to-ignore.html>

⁴ <http://pedlars.info/bis-consultation/167-27-january-2013-third-option.html>

First Option to 'do nothing' or the BIS Second Option to 'repeal'.

We are informed by the CCP point of contact that policy will not be finalised until after a meeting with stakeholder pedlars.

Please confirm that stakeholders will not be let down in this respect and that their proposals for an [agenda](#)⁵ and attendee list will have your oversight.

Please let us know the exact parliamentary process, what scrutiny, what committees and by whom does a Statutory Instrument go through prior to reaching the Grand Committee. It is the intention of pedlars to counter every step of that process with whatever means available, in the General Interest.

Your earliest reply may provide some confidence that the department has accountability.

Yours sincerely

Robert Campbell-Lloyd
Administrator
Roll B Parliamentary Agent

Postal address:
Branchfield House
Ballymote
Co Sligo
Ireland

Attached hard copies

⁵ <http://pedlars.info/bis-consultation/192-6-november-2013-stakeholder-meeting-at-bis.html>