

## Comments on Proposed Amendments to 5 CFR part 2635

Partnership Project. The Partnership Project, a section 501©(3) charitable organization, is a coalition of many of the largest and most influential environmental organizations in the United States. Its members include: American Rivers, Defenders of Wildlife, Earth Justice, Environment America, Environmental Defense Fund, Friends of the Earth, Greenpeace, League of Conservation Voters Education Fund, National Audubon Society, National Parks and Conservation Association, National Wildlife Federation, Natural Resources Defense Council, Ocean Conservancy, Pew Environment Group, Physicians for Social Responsibility, Sierra Club, The Wilderness Society, Union of Concerned Scientists and World Wildlife Fund. The draft proposed rule would amend existing federal employee gift rules to reduce the ability of registered lobbyists and their employers to provide meals, entertainment and invitations to conferences. The draft prosed rule maintains the exemption for section 501(c)(3) charities which is contained in the guidance from the Office of Government Ethics applicable to federal political appointees governed by Executive Order 13490. We direct our comment to this exemption. As noted by the Office of Government Ethics, section 501©(3) organizations, even those registered under the Lobby Disclosure Act, are materially different from most lobbyists. The lobbying activities of tax exempt charitable organizations are limited by statute; in addition, because they are prohibited from intervening in political campaigns they cannot engage in the electoral advocacy now permitted to businesses and trade associations. Most significantly, they provide valuable educational and research resources to the resolution of important public policy issues. The national environmental organizations conduct research and analysis on such pressing issues as the adverse health consequences of various types of environmental pollution and the impact of climate change on biodiversity, agricultural productivity, and the health of oceans and fisheries. They also study the economics, efficiency,

I am submitted the following comments to the Office of Government Ethics on behalf of the

These environmental organizations provide research and analysis to federal employees charged with critical government decisions. In addition, federal employees benefit from attending the briefings and conferences sponsored by such organizations. However unless this exemption is maintained, federal career employees would not be able to attend such events if food is served or if they are given free access to a conference or other event for which a fee is charged. For these reasons we applaud the decision of the Office of Government Ethics to maintain the exemption for charitable organizations.

emissions and safety of alternative and developing sources of energy including nuclear power

Respectfully submitted,

generation.

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