

19 October 2020

The Commissioner for Standards
St Paul Street
Valletta

Sir:

Re: Political advertising featuring a prominent photo portrait of Minister Carmelo Abela

We have seen multiple editions of a full-page advert featuring prominently the logo of the “Ministry within the Office of the Prime Minister” and, we presume, paid for by the same public office and featuring even more prominently a colour portrait of Minister Carmelo Abela.

The written and graphic content of the advert is mostly made up of slogans and does not provide readers with any information that might be considered essential.

In Repubblika’s view, the government, within limits of pre-established budgetary provision, could be justified if it were:

- to advertise for recruitment to front line public services or disciplined forces,
- to provide information on paying taxes,
- to advertise or market museums, galleries and other cultural initiatives,
- to provide information which the government has the legal duty to make available to the public such as changes to legislation or the provision of public services, and
- to advertise activities where there is unequivocal evidence that advertising campaigns deliver measurable benefits relating directly to immediate public health and safety.

The advert in question meets none of these objective criteria and essentially therefore amounts to a public relations vehicle for MP Carmelo Abela who will be seeking re-election to parliament from his constituency. Minister Abela is perfectly entitled to resort to advertising to persuade his constituents to vote for him at the upcoming general election but he should not be doing so at his ministry’s and the public’s expense.

We feel this action falls short of expected standards in public life because the advert amounts to a conflation between Carmelo Abela’s role as a government minister and his

role as MP, using his influence on his Ministry's budget in the first role to secure his confirmation to the second.

Half the advert, and that is half of the expense that went into acquiring it, is dedicated to a glamour photo of Minister Carmelo Abela that in and of itself does not amount to the minister's obligation to ensure he has open communication with the social partners, non-governmental organisations, professional associations, the broadcasting media and the public in general.

That obligation does not justify the promotion of the minister's appearance. It is intended to ensure the dissemination of information on matters of policy or law in line with objective standards such as the ones we suggest in this letter. It would be a wasteful prospect indeed if we are to be charged as taxpayers for advertising campaigns of this scale, size and nature by every government minister, half of the expense for which would be consumed in the dubious benefit of seeing their photos.

There is nothing wrong with humanising government communications with proportionate and contextual images of senior government officers. But Minister Abela's photo is neither proportionate nor in any way contextually relevant. It is nothing short of personal electoral campaigning at the taxpayer's expense.

We also consider that Minister Abela's actions are not in line with the spirit of the conclusions of your reports K/008 and K/010.

In this respect this conduct also falls short of the expectation of responsible and restrained expenditure charged to the public purse that ought to be strictly limited to the government's function of public utility.

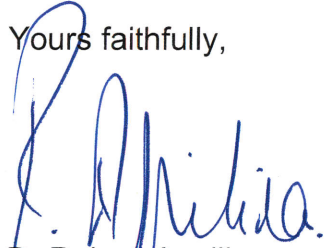
And it falls short of the obligation incumbent on all members of the executive seeking election to the legislature not to allow their government roles to give them unfair advantage over other candidates without access to the illegitimate privilege of abuse of public funds and resources.

It is our view that:

1. Minister Carmelo Abela should be found in breach of the Code of Ethics and of public expenditure rules and is personally (or through his personal campaign) ordered to reimburse 50% of the advertising spend on this campaign to cover the expense on column inches dedicated purely to his photograph.
2. The Commissioner should make recommendations to the government to adopt a centralised control process to restrict advertising by ministers to matters that are strictly within their public function and on objective criteria such as the ones we suggest above. These criteria should explicitly exclude the promotion of the minister on a personal basis through disproportionate imagery, glamour photography, hollow campaign slogans and other features that are typical of election campaign material.

We remain at your disposal to answer any questions you may have.

Yours faithfully,



Dr Robert Aquilina
President, Repubblika

Attachment: Copy of one of the adverts published in local newspapers that is the subject of this complaint.