

Thank you for the opportunity to provide feedback on the Integrity Commission of Tasmania's lobbying report. It is encouraging to see that the Tasmanian Commission has taken certain recommendations into account, but there are improvements needed to ensure the effectiveness and transparency of the proposed reforms. This submission aims to highlight key areas for enhancement and proposes specific recommendations that will strengthen Tasmania's lobbying regulations.

Lobbyist Register Reforms:

The proposed reforms regarding the lobbyist register are of utmost importance. In order to enhance transparency, it is crucial that the Integrity Commission requires lobbyists to declare any donations over \$500, along with the recipient and their political affiliations. However, the suggested timeframe of 12 months for these declarations is inadequate. To address public concerns about the influence of political donations, these declarations should be made within 10 days which is in accordance with the current requirement to update changes of registered details. The Tasmanian community is increasingly vigilant about the impact of donations and expects timely and comprehensive disclosure.

Cooling-off Period:

In alignment with best practices, the Tasmanian Commission should establish a cooling-off period that is more in line with Canada's five-year period. This will ensure that potential conflicts of interest are mitigated and public trust in the integrity of lobbying activities is reinforced. A longer cooling-off period would demonstrate Tasmania's commitment to preventing undue influence and promoting transparency.

Gift Giving Guidance:

The current guidance on gift giving is confusing and contradictory, as it suggests that only gifts from registered lobbyists are prohibited, while gifts from unregistered lobbyists are considered acceptable. This creates a significant loophole that unscrupulous lobbyists and public officials could exploit. To eliminate any potential ethics breaches and maintain the highest standards of integrity, the Commission should revise the guidance to ban all gifts from lobbyists, regardless of their registration status.

Legislative Approach:

The Commission's decision not to propose legislating its lobbying regulations is a missed opportunity. The OECD's Principles of Transparency support a legislative approach to lobbying regulation, emphasizing the importance of a level playing field for compliance. Numerous jurisdictions, such as New South Wales, Queensland, South Australia, and Western Australia, have already enacted legislation in this regard. If the Commission is unable to introduce legislation at present, it should commit to doing so upon review of function and effectiveness after two years, as suggested in the report.

Dual Hatting Period:

The Tasmanian Integrity Commission's recommendation of a 12-month cooling-off period for lobbyists who played a significant role in a successful election campaign falls short of the more substantial period recommended by Queensland's Coaldrake Report. To prevent any potential conflicts of interest and ensure the integrity of the lobbying process, it is essential to introduce a longer cooling-off period, aligning it with the recommendations of the Queensland report.

Allocation of Resources:

It is disconcerting that the successful functioning of the Commission is contingent upon the allocation of sufficient resources for implementation, ongoing maintenance, and administration. To instil public confidence in the Commission's ability to fulfil its crucial mandate, it is imperative that the Commission be adequately resourced. Similarly, funding for the Commission should be guaranteed by law, without

the ability for the government of the day to interfere in its effective functioning. History has shown instances of wilful under-funding, with cuts up to 20%, which undermines the Commission's ability to carry out its duties and must not be tolerated.

Efficient Processes:

The Report proposes processes that aim to minimize administrative burden; however, it is crucial that these processes are fit for purpose. While it is important not to over-burden public officials or Commission personnel, it is equally important to ensure that the proposed processes are effective in achieving their intended goals. A careful balance must be struck to minimize red tape while maximizing the Commission's ability to regulate and monitor lobbying activities effectively.

Inclusion of Local Government:

The Commission's reforms overlook the inclusion of local government in the lobbying framework. This is a significant gap in the integrity system, as local councils have the authority to make decisions that directly impact the quality of life for citizens. Local lobbying can influence the provision of public services, the protection of natural resources, and the promotion of community values. To ensure a comprehensive and robust integrity system, it is imperative that local councils are required to register their lobbying interactions and report them to the Commission. This will foster transparency and accountability at the local level, complementing the reforms proposed for state-level lobbying.

Thank you again for the opportunity to provide feedback on this important subject.

Sincerely,
Chris Lang