## Dear Integrity team

I am grateful for the opportunity to provide feedback on the Tasmania's Lobbying Framework Report. I'm concerned about honesty and transparency within government, and I believe there are some real opportunities now to develop good policies.

It is crucial to maintain integrity and transparency in government and public processes through the proper oversight of lobbying. While the Framework Report has taken steps towards transparency, there are important details that need to be addressed to gain my full support.

- 1. Legislation for Accountability:
- The code of conduct and all requirements related to lobbying should be legislated. Voluntary compliance is not enough to hold lobbyists accountable.
- Legislation would allow for more serious sanctions, such as multi-year bans and fines for non-compliance.
- Tasmania should strive to implement the best lobbying system possible, following the examples of Canada, Ireland, and Scotland.
- 2. Adequate Resourcing for the Commission:
- The successful functioning of the Commission should not be contingent on uncertain resourcing.
- Funding for the Commission should be guaranteed by law to ensure proper and appropriate resources.
- The Commission's independence from government interference should be protected to build public trust in politics.
- 3. Fit-for-Purpose Processes:
- Proposed processes should not burden public officials or Commission personnel but should be sufficiently fit for purpose.
- Balancing administrative burden with effective oversight is crucial for a robust lobbying system.
- 4. Extending Cooling-off Period:
- The proposed 12-month cooling-off period for former public officials is insufficient to minimise their influence on the democratic process.
- A period of 2 to 5 years, as seen in other jurisdictions like Canada, Queensland, and South Australia, would be more appropriate.
- 5. Stronger Disclosure Requirements:
- The proposed disclosure threshold for donations to public officials or political parties should be suitably low to ensure transparency.
- Disclosing the amount of money donated, along with the recipient's name, would provide the public with crucial information.

- Lobbyists should bear responsibility by filling out a disclosure log, improving transparency and access to information.
- 6. Inclusion of City Councils:
- While the remit delivered to the Commission did not include local government, it is significant to maintain integrity in democratic processes.
- The proposed changes should be extended to city councils to ensure consistency and comprehensive oversight.
- 7. Meaningful Disclosure Reforms:
- The Commission has made improvements to disclosure requirements, but more needs to be done.
- Lobbyists should be required to fill out a disclosure log, sharing meaningful and transparent information about lobbying activities.
- Details in the disclosure logs should be expanded to include the topic and intended outcome of lobbying, following the Irish model.
- 8. Inclusion of Ministerial Diaries:
- The Commission should include the publication of Ministerial Diaries within its purview.
- Accessible and meaningful content in Ministerial Diaries would enhance public scrutiny of the government's actions.
- Regular release, at least monthly, would keep the public informed about how ministers spend their time.
- 9. Timely Disclosure of Lobbying Activities:
- The proposed 5-day disclosure period should be reduced to 3 days to ensure timely reporting.
- Ideally, real-time disclosure should be implemented to capture last-minute lobbying before important votes.

To conclude, while the Framework Report has made progress towards transparency in lobbying, addressing these suggested reforms will further improve the system. Legislation, adequate resourcing, comprehensive disclosure requirements, and inclusion of city councils are essential for maintaining integrity and transparency in Tasmania's lobbying framework.

Yours sincerely

Vivianne Vandenberg