

To whom it may concern,

As a teacher living and working in Hobart, I am grateful for the opportunity to provide my input on such a crucial aspect of our democracy. I have read through the report, and I would like to offer the following suggestions for enhancing the Commission's lobbying reforms.

Disclosure of Donations by Lobbyists

- Instead of simply ticking a box to indicate whether they have made a donation in the last 12 months, lobbyists should be required to disclose the recipients and timing of their donations. This level of transparency will enable a better understanding of potential influence and ensure accountability.
- The disclosure threshold should be lowered to around \$1000, as this would enable a wider range of donations to be captured and provide a clearer picture of lobbying activities.

Monitoring Paid Access

- It is vital to include paid access in the Commission's revised recommendations. Currently, lobbyists can gain access to public officials through less formal methods, which can be exploited and go unmonitored.
- Lobbyists often pay significant sums of money to be in the same room as a public official, using it as a business expense. If the payment is below the relevant donation threshold, it remains unnoticed. To address this issue, the Commission should establish a system to track and monitor these instances.

Adequate Funding and Resourcing

- To ensure the effective functioning of the Integrity Commission, it is imperative that it receives sufficient funding and resources. Without proper support, the Commission may struggle to carry out its duties and maintain the level of oversight required.

Legislation for Lobbying Code of Conduct

- Your report does not recommend legislating the Lobbying Code of Conduct, which I believe to be unwise. Legislation would empower the Commission to hold lobbyists and public officials more accountable. It would allow for the implementation of stricter sanctions, such as fines and lobbying bans.
- Following the lead of other states, Tasmania should enact legislation to bolster the Commission's authority and ensure that the lobbying industry operates within a robust legal framework.

Extending Cooling-off Period for Former Public Officials

- The report fails to provide sufficient evidence for the relatively short cooling-off period of 12 months for former public officials. The influence they possess needs to dissipate before they engage in lobbying activities.
- In line with numerous submissions, I recommend extending the cooling-off period to at least 2 years, if not 5, to mitigate the advantage that former public officers may have in their lobbying efforts.

Alignment with International Standards

- The Commission should consider bringing Tasmania's lobbying system in line with countries like Ireland and Scotland, which require detailed information about the intended outcomes of lobbying activities. Additionally, representatives should be obliged to publish their diaries, to further enhance transparency.
- The argument of insufficient resources should not prevent the implementation of a first-rate system. It is crucial to prioritise adequate resourcing to build a top-quality lobbying framework.

Including Local Government in Lobbying Regulation

- While I understand that the Commission's current mandate does not cover local government lobbying, I believe it is important to incorporate this aspect in the future. Lobbying can significantly impact local communities, particularly in relation to planning matters.
- Incorporating local government within the lobbying regulation framework would ensure consistency and comprehensive oversight across all levels of government.

Lengthening the Period for Dual Hatting Restrictions

- The Commission's recommendation for a 12-month cooling-off period for lobbyists involved in successful election campaigns falls short of the more substantial ban proposed by Queensland's Coaldrake Report.
- I propose implementing a more extended period of restriction, preventing dual-hatted individuals from lobbying for the entire term of government. This ensures a significant separation between their roles as campaign participants and lobbyists.

Clarification on Gift-Giving

- I seek clarification from the Commission regarding the inclusion of all gift-giving in the proposed recommendations. It is uncertain how a simple check of the registered lobbyist list would cover all potential gifts from lobbyists.
- To prevent any loopholes and ensure comprehensive transparency, the Commission should provide clear guidelines and mechanisms for monitoring and reporting all gifts received by public officials.

Whilst I appreciate the Commission's efforts thus far in tackling lobbying concerns, I believe there is room for improvement. By implementing these suggestions, Tasmania can establish a more transparent, accountable, and fair lobbying system, bringing the state in line with best practices observed both nationally and globally.

Yours sincerely,

Felicity Jacobs