To whom it may concern

I write as a small business owner and consultant in Tasmania's agrifood sector. I consider that current and past lobbying regulations have put my business at a disadvantage as I have neither the contacts nor the influence exerted by those who could afford the services of formal or informal lobbyists.

I appreciate the opportunity to share my feedback on the proposed reforms for lobbying oversight in Tasmania. The proper regulation of lobbying is crucial in upholding integrity and transparency in government and public processes. While the Framework Report has taken steps towards a more transparent system, there are certain key details missing that prevent me from fully endorsing it.

The Commission should consider adopting a legislative approach to lobbying regulation, as suggested by the OECD's Principles of Transparency. Several jurisdictions, including Australian states, Canada, Ireland, and Scotland, have already implemented legislation to ensure a level playing field for compliance.
Furthermore, to strengthen the transparency of lobbying, all lobbyists should explicitly be prohibited from providing gifts, or anything that could be construed to be a gift, to public officials. This clear prohibition would eliminate any potential conflicts of interest and uphold the integrity of the lobbying process.
Tasmania should follow the best practices of other jurisdictions and enforce a complete ban on so-called dual hatting throughout an individual's entire term of office. Any compromise in this regard would prioritize the interests of the lobbying industry over our own integrity, which is unacceptable.

While the proposed expansion of what constitutes a lobbyist and lobbying activities is commendable, it is disappointing to note that city councils have been excluded from these changes. While not within the original remit, the inclusion of local government in this matter is vital for ensuring the integrity of our democratic processes.

Paid access should be included in the Commission's revised recommendations. Monitoring the informal methods of gaining access to public officials is essential, as lobbyists often pay significant amounts to be in the same room with these officials while categorizing it as a business expense. If the paid amount falls below the relevant donation threshold, it remains unreported. This loophole needs to be closed.

The suggested 12-month cooling-off period for former public officials is insufficient to prevent undue influence. The Commission should analyse the risks associated with allowing these officials to lobby on behalf of private interests so soon after leaving office. A longer cooling-off period, similar to the 5-year period in Canada, would be more ethical and appropriate.

The Commission's proposed model for lobbying oversight is inadequate as it fails to require lobbyists to disclose the recipient and amount of their donations. It only focuses on whether any donations above a particular threshold have been made in the past 12 months. This threshold is not even determined by the Commission but by other legislation. The public deserves to know who is funding public officials and political parties, as well as the extent of these contributions. The donation threshold should be significantly lowered, and the specifics of relevant donations should be made public.

As exemplified by countries like Ireland and Scotland that have implemented top-class systems, Tasmania should require detailed information about the intended outcomes of lobbying activities

and even consider the publication of representatives' diaries. Poor resourcing should not be an excuse for not implementing a robust system that ensures transparency and accountability.

Yours sincerely,

Dr Tom Lewis
Director & Senior Consultant

RESEARCH
DEVELOPMENT
STRATEGY

M +61 417 537 806
P 03 6231 9033

PO Box 22
Lindisfarne TAS 7015
rdspartners.com.au

rdspartners.com.au