

To whom it may concern,

We support the changes outlined for reforming lobbying oversight in Tasmania, and believe the proposed framework could be enhanced with the following considerations:

- Paid access should be included as a lobbying activity. It allows lobbyists to potentially influence public officials and should be reviewed by the Commission.
- The Commission's decision not to legislate lobbying regulations is concerning. Many jurisdictions, including Australian states, Canada, Ireland, and Scotland, have implemented legislation for a fair compliance system. The voluntary system proposed by the Commission may not provide a level playing field and we should strive for better.
- Adequate funding and resources should be provided to the Integrity Commission to ensure its effective functioning.
- The threshold for disclosing donations should be lower than the current federal one. All donations should be captured to maintain transparency. Additionally, registered lobbyists should update their information regularly or when there is a change in circumstances.
- The proposed cooling-off period of 12 months for lobbyists who were involved in election campaigns seems inadequate. Considering the length of a government's term, this period should be reconsidered.
- It is unfortunate that local government lobbying was not included in the Commission's terms of reference. Including the local government tier will increase transparency and limit the secretive targeting of officials.
- The wording in the proposed lobbying activities should explicitly capture agreements made with non-government parties and public officials, as they can influence decision-making.
- The implementation should align with countries like Ireland and Scotland, which require detailed information about lobbying activity outcomes and the publication of representatives' diaries. We should aim to establish a top-class system and resource it appropriately.
- All gifts from lobbyists, not just registered ones, should be covered by the ban on gift giving.
- The proposed 12-month cooling-off period should be increased to align with jurisdictions like Queensland and South Australia, as there is no evidence to support the claim that former public officials struggle to find work within that timeframe.

Thank you for the opportunity to provide input to the framework, and we look forward to a political system with improved integrity and accountability.

Kind regards, Clarence Climate Action