

Good afternoon

I am writing to provide feedback on the Tasmanian Integrity Commission's Lobbying Framework Report and express my support for many of the proposed changes. However, I believe that there are areas where the Commission has not made sufficient progress. As Tasmania aims to implement a world-class lobbying oversight system, similar to those in countries like Ireland or Canada, it is crucial that we strive for excellence in all aspects of reform.

- Legislation for Lobbying Code of Conduct:

The report disappointingly does not recommend legislating the Lobbying Code of Conduct. Legislation would provide the Commission with a stronger position to hold lobbyists and public officials accountable. By enacting legislation, the Commission would also have the authority to introduce more stringent sanctions, such as fines and lobbying bans. It is imperative that Tasmania follows other states' lead in this regard.

- Cooling-off Period for Former Public Officials:

The Commission has failed to provide adequate evidence to support the relatively short cooling-off period of 12 months for former public officials. The influence advantage that former officials possess must be dissipated before they are allowed to lobby current public officials. Numerous submissions have called for longer cooling-off periods, and I strongly suggest increasing it to at least 2 years, if not 5, to ensure a fair and transparent system.

- Transparency in Donation Disclosures:

Ticking a box to indicate if a lobbyist has made a donation in the past 12 months is insufficient. Lobbyists should be required to disclose specific details, including the recipient of the donation and the date it was made. This level of transparency would promote a more accountable lobbying environment. Additionally, the disclosure threshold should be reduced to approximately \$1000 to encompass a wider range of donations.

- Inclusion of Paid Access:

It is perplexing why paid access has not been deemed important enough to be included in the proposed reforms. Lobbyists have the ability to pay exorbitant amounts to gain access to events where they can directly lobby influential public officials. This form of lobbying should be explicitly addressed and regulated in order to mitigate any potential undue influence.

- Ambiguity Surrounding Gift Giving:

The suggested reform states that gift giving between lobbyists and public officials is banned. However, the guidance on this matter is somewhat misleading. It remains unclear whether a lobbyist, who is not registered, can still provide gifts to public officials. The guidance should clarify that any form of gift, regardless of the lobbyist's registration status, is prohibited to ensure a level playing field and prevent any perception of impropriety.

- Guaranteed Funding for the Integrity Commission:

The funding for the Integrity Commission should be guaranteed by law. The crucial processes overseen by the Commission are fundamental to upholding a successful and transparent democracy. It is imperative to provide the Commission with the necessary resources to effectively carry out its duties and maintain the integrity of Tasmania's political system.

By legislating the Lobbying Code of Conduct, extending the cooling-off period, enhancing donation disclosure transparency, including paid access in reforms, clarifying gift-giving guidelines, and guaranteeing funding for the Commission, Tasmania can strive to achieve a world-class lobbying oversight system. It is crucial that we enact reforms that align with international standards and promote transparency, accountability, and the utmost integrity in our political processes.

Thank you for taking the time to consider the points raised above.

Regards

Jane Berriman