

It is positive to see that Tasmania is taking steps towards improving the integrity of governance in the state. I have been dismayed at the lack of transparency, integrity and accountability of our governments over the 30 years I have resided and worked in Tasmania. While the proposed reforms are commendable, there is certainly room for further progress. By seizing this opportunity, the Integrity Commission can position Tasmania at the forefront of transparent governance rather than simply catching up with other jurisdictions.

#### Legislative Approach:

I urge the Commission to consider adopting a legislative approach to lobbying regulation, as recommended by the OECD's Principles of Transparency. Numerous jurisdictions, including Australian states, Canada, Ireland, and Scotland, have already implemented legislation, providing a level playing field for compliance. This proactive approach would signal Tasmania's commitment to open and accountable governance.

#### Cooling-off Period:

Maintaining a cooling-off period of only 12 months, solely based on the difficulty of finding employment for former public officials, may not be sufficient. The purpose of such a period is to mitigate the influence advantage that senior public officials possess due to their networks and knowledge. Considering the magnitude of this advantage, previous submissions have proposed longer cooling-off periods. For instance, Canada mandates a five-year period. I encourage the Commission to increase the cooling-off period to at least three years to ensure a fair and effective transition.

#### Detailed Information and Transparency:

To enhance the transparency of lobbying activities, I recommend aligning Tasmania's implementation with countries such as Ireland and Scotland. These countries require lobbyists to provide detailed information about the intended outcomes of their lobbying activity or publish diaries. While resource constraints have been cited as a reason not to adopt these practices, I implore the Commission to strive for excellence in the system's implementation rather than settling for limitations.

#### Ban on Gift Giving:

I fully support the ban on gift giving between lobbyists and public officials. However, it is crucial to clarify that this ban applies to all lobbyists and not just those who are registered. Inclusivity is essential to guarantee the ban's effectiveness and fairness. By extending the ban to all lobbyists, Tasmania can maintain a level of integrity that leaves no room for circumvention.

#### Inclusion of Local Government:

Local government plays a pivotal role in our democratic system, and it should not be excluded from lobbying reforms. Lobbying activities at the local level can have far-reaching consequences for communities and the environment. To ensure transparency, it is imperative that local councils disclose their meetings and discussions with lobbyists. This step would empower citizens by allowing them to participate in decision-making processes that impact their lives.

#### Dual Hatting:

The concept of dual hatting, wherein lobbyists exert control over public officials to whom they have provided support, requires thorough consideration. While the proposed 12-month cooling-off period aims to minimize this potential conflict of interest, it may not suffice. I urge the Commission to explore a longer period, perhaps aligning with the entire term in office, to effectively diminish the risk of indebtedness.

#### Paid Access and Informal Settings:

Clarification is needed regarding the Commission's stance on paid access. It is essential to include in the updated processes the possibility of public officials being lobbied in informal settings. By capturing these interactions sufficiently, the proposed reforms can ensure transparency and prevent undue influence.

#### Enhanced Disclosure:

To enhance transparency further, lobbyists should not only indicate whether they have donated money in the last 12 months but also disclose the recipients of their donations and the dates of such contributions. This increased level of disclosure, coupled with a reduction in the disclosure threshold to around \$1000, would strengthen accountability and minimize opportunities for undisclosed influence.

Kind regards

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