

30 August 2026

Hon Meg Webb MLC
Member for Nelson
nelson@parliament.tas.gov.au

Dear Ms Webb

Re: Submission to the *Political Lobbying (Integrity and Transparency) Bill 2026 – Exposure Draft*

TasCOSS welcomes the opportunity to comment on the *Political Lobbying (Integrity and Transparency) Bill 2026 – Exposure Draft* (Draft Bill). I acknowledge your longstanding commitment to matters of transparency, integrity and good governance, that underpins the development of this Private Members Bill to give effect to the Tasmanian Integrity Commission's (TIC) recommended model for lobbying oversight.

TasCOSS has advocated for many of the Draft Bill's reforms through our submissions to the TIC's consultations on lobbying oversight in Tasmania in 2022 and 2023. The Draft Bill establishes a statutory lobbyist register, extends regulation to in-house lobbyists, imposes obligations on both lobbyists and public officials, creates a public Contact Disclosure Log, prohibits success fees and certain gifts, introduces a cooling-off period and provides significant enforcement mechanisms.

In a number of respects the Draft Bill is stronger than the TIC's recommended model, and while the Draft Bill represents a significant strengthening of Tasmania's current regulatory arrangements for political lobbying, there are some gaps that I seek to raise for further consideration.

Political donation disclosure

The TIC recommended disclosing whether a lobbyist had made a political donation above the statutory threshold during the preceding 12 months. Although the Draft Bill defines "reportable political donation", there is no prescription within the Draft Bill for political donation disclosure. This appears to be an omission from the TIC model in that it has not translated into the Draft Bill.

Contact disclosure log and timeframe

This is one of the Draft Bill's major strengths. The Draft Bill makes public officials responsible for notifying lobbying contacts and requires disclosure of the official, other officials involved, lobbyist,

client, date, nature, subject matter and form of communication. It also requires publication online and retention for at least six years.

There is, however, a significant timing difference. The TIC recommended disclosure within five working days of the contact. Under the Draft Bill, officials have until 10 working days **after the end of the month** in which contact occurred to report it, after which the TIC has a further 10 working days to publish it.

In effect, a contact at the start of a month could therefore remain unpublished for up to 50 days, substantially longer than under the TIC model and TasCOSS recommendation.

Given TasCOSS' emphasis on information being timely and relevant to current decision-making, the TIC recommended disclosure should be adopted.

The Draft Bill provides for a two-year period for previous public employment and 12 months for campaign advice. While TasCOSS advocated for an even stronger disclosure, the Draft Bill represents an improvement on the TIC model.

Conduct standards

The lobbyist standards in the Draft Bill reproduce much of the TIC model. However, we note some important omissions.

The TIC required lobbyists to take steps to ensure that public officials did not rely on inaccurate information. This obligation is not expressly reproduced in the Draft Bill.

The TIC also recommended an explicit prohibition on public officials giving preferential treatment or preferential access to particular individuals or groups. The Draft Bill requires lobbying contact to be documented and prohibits disclosure of information producing an unfair advantage, but does not reproduce the preferential treatment/access prohibition.

The TIC recommended that any reasonably suspected breach by a lobbyist or public official be reported to the TIC as soon as practicable. There does not appear to be an equivalent general reporting obligation in the Draft Bill.

The TIC also proposed that public officials not knowingly engage in lobbying by a lobbyist who, in the official's opinion, had failed to comply with the lobbyist conduct standards. The Draft Bill prohibits dealings with unregistered lobbyists and lobbyists who fail to provide identifying

information, but does not include the broader prohibition applying where conduct standards have been breached.

Broader coverage of public officials

TasCOSS recommended that the definition include, at a minimum, all MPs, senior staff, senior political-party officials and elected local-government members. The Draft Bill covers all MPs and people employed in their offices, but does not extend to senior political-party officials or local-government elected representatives.

TasCOSS maintains that accountability mechanisms should continue to be developed at all levels of government and encourages the inclusion of senior political-party officials and local-government elected representatives to be reconsidered.

Grassroots campaign exemption

To ensure community organisations and volunteer advocacy was not inadvertently captured, TasCOSS recommended an express exemption for petitions or communications of a grassroots campaign nature advocating for, or representing an interest in, a government policy or decision.

The Draft Bill does not expressly add that exemption. It does, however, reduce the practical concern in two important ways – by excluding employees lobbying on behalf of not-for-profit organisations and excluding public consultation submissions, hearings and petitions.

Enforcement

The Draft Bill substantially strengthens enforcement which responds to a key TasCOSS priority. TasCOSS had raised concerns the TIC framework lacked concrete compliance mechanisms and argued that penalties or other consequences were needed to create meaningful incentives for compliance.

The Draft Bill responds directly by providing penalties of up to 200 penalty units and/or two years' imprisonment for a range of breaches, together with deregistration and information-gathering powers.

Further reform of the Integrity Commission

TasCOSS recommended changes to the TIC's jurisdiction and oversight so it could more effectively investigate, monitor and report on government decision-making, additional funding for its lobbying oversight functions and consideration of a dedicated lobbying commissioner.

The Draft Bill gives the TIC substantial administrative responsibilities but does not amend its underlying jurisdiction, provide funding or establish a lobbying commissioner.

Recommendations

The Draft Bill is a strong and important reform that substantially implements the TIC model, gives effect to many TasCOSS priorities and legislates stronger oversight of political lobbying activities in Tasmania. TasCOSS makes the following recommendations to improve the Draft Bill:

1. Require disclosure on the lobbyist register of political donations above the legislative threshold during the previous 12 months.
2. Restore a substantially shorter disclosure timeframe, preferably the TIC's five-working-day requirement.
3. Require lobbyists to correct or prevent reliance on inaccurate information.
4. Include an explicit prohibition on preferential treatment and preferential access.
5. Require reasonably suspected breaches to be reported to the TIC.
6. Consider extending coverage to senior political-party officials and local-government elected representatives.
7. Ensure implementation is accompanied by sufficient resourcing for the TIC to effectively perform its lobbying oversight functions.

Yours sincerely



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