



Working together for a shared future

16 September 2015

Ms Di Farmer MP
Chair
Finance and Administration Committee
Queensland Parliament

e-mail: fac@parliament.qld.gov.au

Dear Ms Farmer

Re: Inquiry into the Report on the *Strategic Review of the Functions of the Integrity Commissioner*

The organisations identified by the logos incorporated in this letter make the following summary response to the Inquiry, as a 'common cause' position on the Lobbying functions element of the Inquiry's Terms of Reference. This letter may be supported by and read in conjunction with any further individual submissions to the Inquiry from each organisation.

We support and recommend maintaining the status quo on the definition and regulation of lobbyists, as the Report on the *Strategic Review of the Functions of the Integrity Commissioner* (the report) is not persuasive or enlightening on many points to justify the claims and recommendations made. We endorse the Government's commitment to openness, accountability and transparency, which would not, in our collective view, be advanced through the means proposed in this report.

Further, consisting of many representative non-profit industry peak bodies, employer unions and organisations, which would fall within the report's recommended expansion of the definition of lobbyists, it is disappointing that not a single organisation of our kind was consulted in the research and consultation or in the compilation phases of this report. Consultation was confined to a select group of professional fee-paid lobbyists and to the current and former Integrity Commissioner. The report is flawed by this procedural exclusion, a process which we note is inconsistent with the Palaszczuk Government's oft-stated public commitment to consult and to listen.

To our organisations it would seem that, based on the one-sided inputs of professional fee-paid lobbyists already captured under the registration provisions, and without any consultation with the wider set of organisations subject to the proposals, the report is recommending a major expansion of the coverage of the lobbyist provisions.

Our organisations are not comparable to 'fee-paid' lobbying bodies. We are non-profit organisations advocating on policy at the pre-competitive level. Our organisations represent our collective members, not fee paying clients. We do not seek commercial advantage of individual members. There is no secret about for whom we advocate – our membership lists are proudly displayed on our websites.

Issues are identified in the report that fall into the realm of misconduct e.g. a serious allegation (without any supporting evidence) of 'gaming' and 'collusion' in relation to Ministerial diary entries. With Ministerial diaries even being published in the tabloid media, this is an entirely different issue that only Government can address, and not by expanding and imposing regulatory burdens as lobbyists on external organisations. The report is suggestive that more work is required on accountability, monitoring and compliance regimes, including penalties, in Government and the bureaucracy. Attempting to shift the cause for these alleged failings to inadequate definition and control of 'lobbying' is not credible.

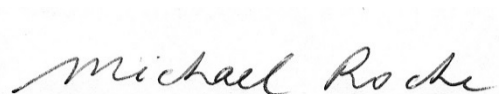
All of our organisations note that we individually provide advice and services regularly requested by Government. Resources are provided and at no cost to Government. Far from willingly lobbying, we are actively invited to contribute to the public policy process by Government on a regular, ongoing basis. Government recognises it does not have the relationships, reach and knowledge that each organisation brings to policy and issues discussions and resolution.

Finally, the unintended consequences of the recommendations have not been sufficiently considered. Expansion of the definition of lobbyists to include in-house advocates, industry bodies and unions of employers must necessarily draw in many other organisations such as unions of employees, NGOs, community groups, indeed any groups advocating to Government for policy changes, decisions and or funding with commercial implications. To cherry pick from amongst types of organisations, including some but not others in any expanded regulatory control, would only sacrifice public confidence in the motivation and outcomes of any expansion in regulatory change in lobbying.

On behalf of my colleagues in fellow organisations who support the position outlined in this letter through inclusion of their logos, we reiterate that this report's recommendations with regard to lobbying be set aside, and the status quo be maintained.

We look forward to contributing in person at the Finance and Administration Committee's hearings on these and other lobbying matters raised by this report on 14 October 2015.

Yours sincerely



Michael Roche
Chief Executive
Queensland Resources Council

For and on behalf of the organisations specified above.