



OUR REF: 2025/001972

1 July 2025

Hon Meg Webb MLC
Independent Member for Nelson

By email: cath.hughes@parliament.tas.gov.au

Dear Ms Webb

Lobbying Code of Conduct not proceeding

Thank you for your letter of 19 June 2025 in relation to the proposed Lobbying Code of Conduct.

As you are aware, we conducted a comprehensive research and consultation process commencing in mid-2022, culminating in the development of a proposed new Lobbying Code of Conduct in late 2023.

The Board thanks you for your ongoing interest in this project and acknowledges the submissions you made during the consultation process.

As you are aware, the Board decided in June 2025 not to proceed with the launch of the new Code on 1 July 2025, following various representations from parliamentarians. Our reasons for doing so and our suggested future course of action for the Parliament are set out in detail below.

Background for reform

Ethical lobbying of politicians is both a legitimate activity and an important part of the democratic process. Lobbying characterised by secrecy, however, is contrary to the public interest.

The current Lobbying Code of Conduct represents a very modest regulatory response. Currently, the Tasmanian public has no way of knowing any details of the frequency, type or subject of lobbying undertaken by lobbyists.

As set out in our Model Framework Report¹ released in June 2023:

Lack of transparency and accountability in lobbying activities risks eroding public trust that decisions are being made fairly and in the public interest, and may lead to perceptions that there is an imbalance towards decisions being made due to powerful minority interests.

The Code that the Board approved represented a substantial improvement to the transparency of the lobbying oversight system. Importantly, the improvements would have resulted in minimal additional administrative burden.

We consistently sought to tailor the scope of the reforms to allow for buy-in from stakeholders. For example, in response to bipartisan feedback in late 2024, the Board approved an amendment to the Code that reduced the scope of lobbying activities to lobbying that is undertaken by registered lobbyists.

Prior to the proposed launch of the new Code on 1 July 2025, we received representations from the Government, the Opposition and the Greens, each raising a number of concerns. Given those concerns, it appeared that much of the Parliament was opposed to key elements of the new Code.

Characteristics of best practice lobbying regulation

There are many avenues for achieving best practice lobbying regulation. Importantly, we consider that those who are lobbied should be required to disclose publicly who has lobbied them and why.

All Members of Parliament and senior officials should be required to disclose when they have been lobbied, not just members of the Government. The administrative burden of reporting should be proportionate to the aims of the regulatory framework.

Regulation should apply to third party lobbyists who represent the interests of their clients, as well as to in-house lobbyists who represent the interests of their employers.

The way forward

We took on administration of the current Code in 2022 with no additional resources and undertook a thorough and exhaustive research and consultation process, including three rounds of consultation.

It became increasingly apparent that even if our recommended model had begun to operate there was no real possibility it would receive the necessary support. Accordingly, we decided not to proceed with the launch.

In our view it is now appropriate for the Parliament to legislate a model that it believes strikes the right balance between transparency and privacy. This would allow Parliamentarians to consider, debate, and agree on a model that they believe would work.

¹ *Model for Reform of Lobbying Oversight in Tasmania*, page 2. Available at: <https://lobbyists.integrity.tas.gov.au/reforming-lobbying-oversight-in-tasmania>



Our recommended model remains available on our website at:
[https://lobbyists.integrity.tas.gov.au/reforming-lobbying-oversight-in-tasmania.](https://lobbyists.integrity.tas.gov.au/reforming-lobbying-oversight-in-tasmania)

Yours sincerely,

Ellen McKenzie
Chief Executive Officer