

Submission:

Political Lobbying (Integrity and Transparency) Bill 2026

1. Overview

COTA Tasmania supports the *Political Lobbying (Integrity and Transparency) Bill 2026* in principle, and welcomes the opportunity to provide this submission.

Transparent and accountable lobbying is an important part of maintaining public confidence in government and democratic institutions. Lobbying itself is a legitimate part of the policy process. Governments benefit from hearing from businesses, professional bodies, community organisations, advocates and individuals with relevant knowledge and lived experience.

However, access to decision-makers is not evenly distributed. Organisations with substantial financial and institutional resources are generally better placed to secure regular access to government and to engage professional lobbying or government relations expertise.

For that reason, transparency in lobbying should be seen not only as an integrity measure, but also as an equity measure. Greater public visibility of who is seeking to influence government, on whose behalf, and about what issues can help illuminate imbalances in access and influence.

COTA Tasmania therefore supports the Bill's proposed statutory framework, including registration requirements, disclosure of lobbying contacts, cooling-off provisions, and restrictions on inappropriate payments and gifts.

2. About COTA Tasmania

COTA Tasmania is the peak body representing the interests of older Tasmanians. Our role is to promote the rights, interests and wellbeing of older people, to ensure their voices and lived experience inform public policy and decision-making, and to advocate for a Tasmania in which people can age with dignity, choice, security, and full participation in community life.

As an advocacy organisation, COTA Tasmania engages with governments, parliamentarians, agencies and other decision-makers on matters affecting older Tasmanians. We therefore have a direct interest in ensuring that lobbying regulation strengthens transparency and integrity without inadvertently constraining legitimate public-interest and community advocacy.

3. Detailed Comments

3.1 Transparency of lobbying contacts

COTA Tasmania particularly supports the proposed Contact Disclosure Log.

A register of lobbyists provides limited public value if it identifies only who is permitted to lobby. Greater transparency is achieved when the community can also see who has met or communicated with decision-makers, the subject matter discussed and, where relevant, the client on whose behalf lobbying occurred.

To maximise its value, the Contact Disclosure Log should be designed for public use rather than simply regulatory compliance.

COTA Tasmania recommends that the Log be:

- readily searchable by lobbyist, client, public official, agency, date and subject matter;
- presented in plain language;
- accessible to people using assistive technology;
- capable of being downloaded or analysed over time; and
- maintained in a format that does not require high levels of digital literacy to navigate.

Transparency measures are most effective when ordinary members of the public can readily understand and use them.

3.2 Protecting legitimate community advocacy

COTA Tasmania supports the Bill's recognition that not-for-profit and community advocacy should not be treated in the same way as professional lobbying.

Advocacy and lobbying overlap, but are not synonymous.

Advocacy is the broader activity: seeking to influence public policy, political priorities and public opinion for the greater community good, through research, public communication, consultation, and direct engagement with decision-makers.

Lobbying is a more specific form of advocacy involving direct communication with government or political decision-makers for the purpose of influencing a particular policy, legislative, administrative or funding decision to benefits specific individuals or organisations. This distinction is important in designing a regulatory regime that captures activity warranting transparency without treating ordinary public-interest advocacy as professional lobbying.

Community organisations often advocate because the people they represent do not have equivalent individual access to decision-makers. This is particularly relevant to older people, people experiencing disadvantage, people living in regional and rural communities, and those who may face barriers to participation in formal consultation processes.

It is therefore important that the proposed exemptions for not-for-profit organisations are retained.

COTA Tasmania recommends that accompanying guidance make clear that these exemptions extend to the broad range of organisations involved in legitimate community and public-interest advocacy, including charities, consumer organisations, incorporated and unincorporated community groups, peak bodies, and representative organisations.

The receipt of government funding should not, of itself, affect an organisation's ability to undertake legitimate advocacy without being treated as a professional lobbyist.

At the same time, COTA Tasmania recognises that not-for-profit status alone may not always reflect the scale of an organisation's resources or capacity to influence government. We do not consider this warrants narrowing the exemption at this stage.

However, this issue would be appropriate for consideration as part of the Bill's proposed statutory review.

3.3 Local government

COTA Tasmania notes that the proposed framework does not extend to local government.

Local councils make decisions that have substantial impacts on the daily lives of older Tasmanians, including decisions relating to planning, housing, transport, accessibility, public infrastructure, community facilities and local services.

Commercial and other interests may also seek to influence decisions at local government level, particularly in relation to planning and development.

COTA Tasmania acknowledges that extension of the proposed regime to local government may require further consideration and should not necessarily delay the current Bill.

We recommend, however, that the statutory review specifically consider whether appropriate lobbying transparency requirements should also apply to Tasmanian local government.

3.4 Transparency must be accompanied by inclusive consultation

While transparency can show the community who has access to decision-makers, it cannot by itself ensure equitable access.

A well-resourced organisation may have substantial capacity to engage directly with Ministers, senior officials and advisers. An individual older Tasmanian, volunteer community group, or small advocacy organisation may have considerably fewer opportunities to do so.

COTA Tasmania therefore considers lobbying reform should sit alongside a broader commitment by government to high-quality, inclusive public consultation.

Government agencies should actively seek the views of people and communities who may otherwise be under-represented in decision-making, rather than relying primarily on stakeholders with the resources and networks to initiate contact themselves.

This includes retaining non-digital avenues for participation and ensuring that consultation processes are accessible to older people, people with disability and people with limited digital access or confidence.

4. Recommendations

COTA Tasmania recommends that:

1. The proposed Contact Disclosure Log be designed as a genuinely accessible public transparency tool, including strong search functionality, plain-language presentation and accessibility for people with differing levels of digital capability.

2. The exemption for legitimate not-for-profit and community advocacy be retained and supported by clear guidance covering charities, community organisations, consumer organisations, peak bodies, and representative groups.
3. Receipt of government funding should not, of itself, affect an organisation's eligibility for the not-for-profit advocacy exemption.
4. The statutory review of the legislation examine whether the exemptions are operating as intended and whether any significant transparency gaps have emerged.
5. The statutory review also examine the case for extending appropriate lobbying transparency requirements to local government.
6. Lobbying transparency reforms be accompanied by continued efforts across government to ensure consultation and engagement processes provide meaningful opportunities for participation by people and communities who may have less access to decision-makers.

5. Conclusion

COTA Tasmania supports stronger transparency and accountability around lobbying in Tasmania.

The proposed legislation provides an important opportunity to strengthen public confidence in government decision-making while appropriately recognising that lobbying and advocacy are legitimate elements of a healthy democracy.

The challenge is to achieve transparency without creating barriers to community participation.

In our view, the Bill largely strikes that balance. With strong public accessibility, clear protection for legitimate community advocacy and appropriate review of its operation over time, it has the potential to make an important contribution to integrity and transparency in Tasmania.

COTA Tasmania would welcome the opportunity to provide any further information relevant to consideration of the Bill.