Lake Macquarie
City Council

24 May 2019

Chief Commissioner
NSW Independent Commission Against Corruption
GPO Box 500
Sydney NSW 2001
via email: lobbying@icac.nsw.gov.au

Dear Commissioner

Subject: ICAC Discussion Paper: Enhancing the democratic role of direct lobbying in New South Wales

Thank you for the opportunity to provide feedback on the Commission's Discussion Paper *Enhancing the democratic role of direct lobbying in New South Wales*. The paper raises some interesting points.

Although lobbying is a legitimate activity and an important part of the democratic process, the Discussion Paper rightly acknowledges that there are issues with how lobbying should be regulated. The community, and its confidence in government, needs to be at the heart of the regulatory framework for lobbying in NSW.

Transparency and accountability is fundamental to building community confidence in government. As such, the regulation of lobbying needs to be as open and subject to meaningful scrutiny as any other part of government. Fair, consistent, and transparent decision-making processes will support long-term confidence in successive governments.

In addition to community confidence, the Commission's recommendations need to be considerate of administrative burden. An onerous system may negatively affect organisations with limited resources (such as charities), whilst also enticing some lobbying activities to go underground. The Commission could consider recommending the adoption of a risk-based approach to the regulation of lobbying. This would ensure the regulatory impact corresponds to the level of risk to government integrity. It could also ensure compliance and enforcement activities are proportionate and focused on delivering the best regulatory outcomes for the people of NSW.

Should you require further information, please do not hesitate to contact Laura Kendall, Director Organisational Services, on 02 4921 0550 or lkendall@lakemac.nsw.gov.au.

Yours sincerely

Morven Cameron
Chief Executive Officer

126-138 Main Road Speers Point NSW 2284   T 02 4921 0333   www.lakemac.com.au
Box 1906 Hunter Region Mail Centre NSW 2310   F 02 4958 7257   www.facebook.com/lakemaccity
ABN: 81 065 027 868   E council@lakemac.nsw.gov.au   www.twitter.com/lakemac