

Our reference: COM 02250-2011

- 4 MAR 2011

Dr David Solomon AM
Queensland Integrity Commissioner
PO Box 15290
CITY EAST QLD 4002

Department of
Communities

Office of the
Director-General

Dear Dr Solomon

Thank you for your letter of 3 February 2011 inviting submissions relating to your review of the operation of the lobbying provisions of the *Integrity Act 2009* (chapter 4 of the Act) with a view to making recommendations to the government for changes to the system.

I note that your review will take into account a recent report by the New South Wales Independent Commissioner Against Corruption (ICAC) following an investigation into corruption risks associated with lobbying in New South Wales.

The Executive Summary of the ICAC report makes a particularly valid observation:

'The primary aim of any lobbying regulatory system must be to improve transparency and address other corruption risks in a manner that is practical and not necessarily onerous, and one that does not necessarily interfere with legitimate access to government decision makers.'

Queensland's *Integrity Act 2009* (the Act) and the Lobbyists Code of Conduct (the Code) appear to have struck a reasonably fair balance between the need for transparency and the rights of registered lobbyists to conduct legitimate lobbying activities without unnecessary interference.

Thank you again for inviting comments or suggestions on both the Act and the Code, however, to this point the Department of Communities has not experienced, or had brought to attention, any significant ambiguities or anomalies in either the Act or the Code.

If you require any further information or assistance in relation to this matter, please contact Mr Ken Ezzey, Manager, Ethical Standards, Human Resources and Ethical Standards, Department of Communities on 3247 5977.

Yours sincerely



Linda A Apelt
Director-General

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