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Date	10 th March 2011

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

Dear Dr Solomon

REVIEW OF THE OPERATION OF LOBBYING PROVISIONS – INTEGRITY ACT 2009

I refer to your letter dated 3rd February 2011.

The Council notes the obligation, created by section 71 of the *Integrity Act 2009*, for Councillors and the Chief Executive Officer to advise you about entities that are not registered lobbyists seeking to carry out lobbying activities for third party clients with Councillors and Council officers.

The Council understands and accepts the policy rationale behind these provisions but also notes the administrative burden, particularly associated with continuing education and record keeping, created by them.

The Council also notes the power given to Councillors and the Chief Executive Officer, under section 72A of the Act, to give you information, including personal information, about lobbyists and lobbying activity.


The Council considers that a decision to exercise these powers as a matter of policy would introduce an additional, and significant, administrative burden to the ordinary business of the Council. The Council would, for example, have to maintain a register of lobbying activity carried out with Councillors and officers in order to compile information to be provided to the Commissioner.

The Council considers it entirely appropriate that section 72A is framed as a power rather than an obligation.

The Council would object to any amendment to the Act having the effect of requiring Councillors and the Chief Executive Officer to give the Commissioner information about registered lobbyists and lobbying activity carried out by them.

The Council suggests that it would be more appropriate to direct the burden of any policy drive to compile information about lobbying activity carried out with Councillors and Council officers to registered lobbyists. Recording and advising the Commissioner about lobbying activity with Councillors and Council Officers could be made a condition of registration, for example.

Yours sincerely


John Rauber
Chief Executive Officer