The Invisible Hand

How Australia’s Lobbying System Enables Hidden Corporate Power

Analysis of the Federal Lobbyist Register

AUSTRALIAN DEMOCRACY NETWORK

August 2026

We acknowledge the Traditional Owners of the land on which we work and live and pay our respects to Elders past and present. We recognise that this land always was and always will be Aboriginal and Torres Strait Islander land and sovereignty has never been ceded. We believe that the inclusion of First Nations perspectives, justice and reconciliation are central to any vision of rebuilding a healthy and vibrant democracy for Australia.

Publication Details

Report compiled for Australian Democracy Network (ADN) by Christian Slattery, with assistance from Isabella Morand and expert review by Dr Jenn Lacy-Nichols (University of Melbourne). Design by Made Visual (madevisual.com.au).

Contents

KEY TERMS

Third-party lobbyist:
A lobbyist paid by a client to lobby the government on their behalf, usually through a lobbying firm. Also sometimes referred to as a consultant lobbyist.

In-house lobbyist:
A lobbyist employed directly by a company or organisation whose role includes influencing government decisions. These roles may be described as government relations or public affairs advisors.

Industry association:
An organisation that represents companies operating in the same industry and engages in public advocacy on their behalf.

01 Executive Summary

"While lobbying plays a legitimate role in the functioning of the democratic process, its use to communicate the views of individuals and different parts of the community to decision-makers carries inherent risks that the decision-making process may become distorted or corrupted."[1]

— **Victoria Independent Broad-based Anti-corruption Commission**

Australians expect their government to make decisions in the public interest. In a democracy, it is normal and healthy for people and organisations to try and shape those decisions.

At its best, lobbying gives experts and stakeholders a pathway to provide important information and advice to elected representatives and government decision-makers. However, when lobbying is conducted by well-resourced corporations motivated by narrow commercial interests, and hidden from public view, there are risks of undue influence, regulatory capture, and corruption.[2] This 'invisible hand' of influence over government decisions has far-reaching impacts over ordinary people's lives.

Managing these risks requires strong transparency and accountability safeguards that protect the integrity of our democracy. But our analysis of the federal Lobbyist Register finds critical flaws that undermine public trust in government integrity.

KEY FINDINGS

1. Hidden Corporate Lobbying

Over half (**58%**) of ASX100 companies are not listed as clients on the federal Lobbying Register, and almost three-quarters (**70%**) of ASX300 companies are not listed, representing more than $1.6 trillion in market capitalisation. This includes some of Australia's largest companies such as Commonwealth Bank, Santos, and Qantas.

The current rules only apply to third-party lobbyists, completely ignoring in-house lobbyists employed directly by corporations and industry associations – a major source of political influence and potential conflicts of interest.

2. An Extensive 'Revolving Door' Phenomenon

Almost two-thirds (**64%**) of the registered lobbyists in Canberra are former federal (**45%**) or state (**18%**) government representatives. Without oversight and strong safeguards, well-resourced corporations can influence government policy by employing people with extensive experience, knowledge, and contacts to benefit their commercial interests.

We identified a clear transparency issue with the current rules, whereby former federal and state politicians, senior party officials, and non-ministerial federal and state advisors are not required to identify their previous government experience.

3. Major Party Domination

Almost all (**89%**) former political representatives were associated with the two major parties, including 22 former federal ministers or assistant ministers and 21 former federal and state members of parliament. Only 6 people were found to be associated with minor parties or independents.

This concentration of major party representation in lobbying circles comes as Australian politics fragments, and public concern mounts about a political class that is disconnected with ordinary people.

Australian Democracy Network's recent polling found almost two-thirds of Australians believe the political system is not working for ordinary people, and that the government is more focused on powerful interests than ordinary Australians. However this polling also showed strong majority support for reforms that would strengthen our democracy, including lobbying reform.[3] This means Australians have not given up on democracy — they are looking for practical reforms that improve confidence in government.

Australia needs a lobbying system that is more transparent, more accountable and more trusted. Urgent change is needed to restore public confidence in the integrity of our democratic processes, and to ensure transparency and accountability are central to the system that regulates political lobbying by vested interests.

1.1 Recommendations

AUSTRALIA NEEDS A FEDERAL LOBBYING ACT

This should codify transparency and accountability standards into law, ensuring that all lobbying requirements are clearly defined and enforceable.

The Act should include:

1. Universal Rules

Broaden the definition of "lobbyist" to encompass all professional lobbyists. This must include in-house corporate and industry association roles, ensuring that these groups are subject to the same transparency requirements as currently apply to third-party lobbyists.

2. Strong Lobbying Bans

Implement a comprehensive framework to manage the transition from public office to lobbying. This should include a five-year lobbying ban for former ministers and assistant ministers, and a requirement for all registered lobbyists to disclose prior government and political roles.

3. Transparency and Accountability

Require the proactive publication of ministerial and advisor meeting diaries, mandate detailed lobbyist activity reporting (disclosing the lobbyist, the client, the issue, and the date), and prohibit the use of success-based fee arrangements for lobbying services.

4. Independent Regulator

Transfer oversight of lobbying regulations from the Attorney-General's Department to an independent integrity body capable of overseeing the system and enforcing the rules.

5. Effective Penalties

The regulator must be empowered to monitor compliance, investigate alleged breaches, and impose meaningful civil and criminal penalties that serve as effective deterrents against misconduct.

02 Australia's Outdated Lobbying Framework

"Lobbying regulations must be transparent and hold both lobbyists and decision-makers to account to protect the public interest." [4]

— Victoria Independent Broad-based Anti-corruption Commission

2.1 The Role of Lobbying

Lobbying is a fundamentally democratic activity that facilitates public participation in the development and implementation of policy. It involves communicating with public officials – including government representatives, parliamentarians, and public servants — with the intent to influence government decision-making, policy, legislation or funding outcomes.[5]

Lobbying is carried out every day by charities, unions, businesses, industry groups, universities and community organisations. In a healthy democracy, governments should hear from all of them. Problems arise when some interests enjoy greater access, greater resources or less transparency than others.

Ineffective or inadequate lobbying regulation can lead to "undue influence, unfair competition and regulatory capture to the detriment of fair, impartial and effective policy making".[6] Numerous state-based anti-corruption bodies have also identified that poorly regulated lobbying poses inherent risks of corruption, undue influence, and unfair access.[7]

Clear, transparent, and enforceable rules governing lobbying are indispensable to public trust in our government, and ensuring decisions serve the public interest.

2.2 Australia's Lobbying Rules

The regulation of federal lobbying is governed by the *Lobbying Code of Conduct* (the Code), introduced in 2008 and administered by the Attorney-General's Department. Now almost 20 years old, the federal framework has not kept pace with the growth and professionalisation of the lobbying industry or contemporary expectations of integrity and transparency.

The federal framework is already significantly weaker than those operating in Australian states.[8] Four Australian jurisdictions (Victoria, Queensland, South Australia, and the Australian Capital Territory) are currently reviewing their lobbying rules with the expectation that they will be strengthened,[9] further isolating the Commonwealth.

The stated purpose of the Code is to "promote trust in the integrity of government processes and ensure that contact between lobbyists and Government representatives is conducted in accordance with public expectations of transparency, integrity and honesty".[10]

The Code is supported by a Lobbyist Register, providing details of the **363 lobbying firms**, **714 lobbyists**, and **2,385 clients** registered under the scheme.[11]

The Code and Register aim for three outcomes:

1. Government representatives make informed judgements about lobbyist interests.
2. There is transparent contact between lobbyists and Government representatives.
3. There is public trust in the integrity of government processes.

The current framework completely fails to achieve the second and third of these outcomes.

WHAT IS THE LOBBYING CODE?

The Lobbying Code of Conduct sets the rules for lobbyists. It establishes who must register, what information must be disclosed and places some restrictions on lobbying by former government representatives. Currently, the Code of Conduct only applies to consultant lobbyists.

03 The Invisible Corporate Lobbyists

“The circumstances that are conducive to corrupt conduct in lobbying by in-house lobbyists pose an enhanced risk of corrupt conduct in public office.” [12]

— **NSW Independent Commission Against Corruption (ICAC)**

The current federal rules regulate third-party lobbyists but do not apply to people employed directly by companies or industry associations to influence government (in-house lobbyists). This is the most significant flaw in Australia’s lobbying system.

Integrity experts estimate these unregulated lobbyists may represent up to 80% of federal lobbyists. [13]

Many organisations, including unions, charities, and faith groups, also employ in-house lobbyists. These roles are not inherently problematic, but require transparency to ensure public confidence in decision-making. There is no principled reason for lobbying rules to require registration of third-party lobbyists, but not those who work in-house.

Up to 80% of federal lobbyists are unregulated.

3.1 Corporate In-House Lobbyists

Companies that employ their own in-house government relations staff are not required to register or adhere to the Code. This means their lobbying activities are entirely invisible to the public, and, critically, their in-house lobbyists are not subject to the 12 and 18-month cooling-off periods that apply to third-party lobbyists.

This direct employment arguably poses an even greater, unmonitored risk of undue influence than third-party lobbying. For instance, it is common for former advisors and chiefs of staff to move into lobbying roles directly after leaving government.[14] When this occurs, there is limited public scrutiny or restrictions on what issues they lobby on, including matters they had policy responsibility for.

The scale of this transparency gap becomes clear when Australia's largest companies are examined:

- Over half (**58%**) of ASX100 companies are not listed as clients on the Register. And almost three-quarters (**70%**) of ASX300 companies are not listed, representing more than **$1.6 trillion** in market capitalisation.
- Notable absences include some of Australia's largest public companies – for example, banks (**Commonwealth** and **NAB**), coal and gas companies (**Santos**, **APA Group**, **Whitehaven Coal**), gambling companies (**Aristocrat Leisure and Tabcorp**), media outlets (**News Corporation**), and airlines (**Qantas**).

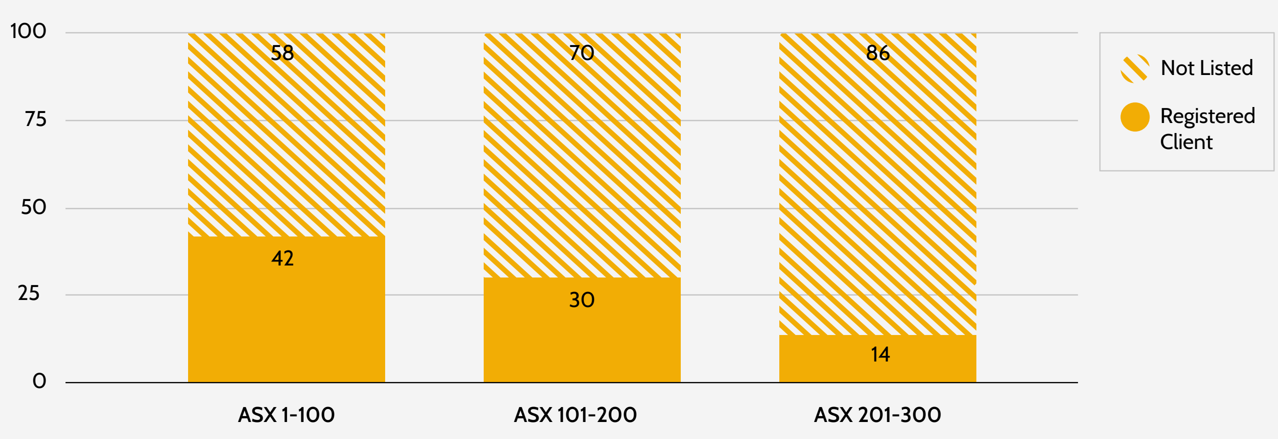
These are some of Australia's biggest companies, with significant commercial interests in the formation of government policy and decision-making. It is not only implausible that many of these companies do not have lobbyists, it is a matter of public record that these companies regularly lobby governments to protect their commercial interests. A far more likely explanation for their absence from the Register is most likely that these companies rely on unregulated in-house government relations staff or industry associations to conduct their lobbying.

Experienced political advisers frequently move into senior government relations positions within major corporations. We do not suggest wrongdoing by any of the individuals involved. Rather, the failure to capture this lobbying creates significant risks of undetected conflicts of interest, fails to protect public interest decision-making, and allows the most powerful companies to conduct their lobbying operations completely outside the current integrity framework.

CASE STUDY:

A large company employs someone whose full-time job is meeting ministers about government policy. Because they work directly for the company, they generally do not appear on the federal Lobbyist Register. If the same company hired an external lobbying firm to attend exactly the same meetings, those consultants would generally have to register.

Representation of Publicly-Listed Companies on the Lobbyist Register



3.2 Industry Associations

Industry associations represent large sectors such as banking, mining, aviation, property, gambling, construction and health. Many of Australia's biggest companies communicate with the federal government via their industry association. These associations are part of everyday government decision-making. They regularly sit on advisory bodies, make submissions to inquiries and meet ministers on behalf of entire sectors, ultimately wielding immense influence over policy development.

Industry association lobbyists are not required to register under the Code. The only time industry associations appear on the Register are if they are a client of a third-party lobbyist. This represents a potentially vast area of unmonitored influence and their lack of coverage is a significant weakness of the federal Code.

The table below illustrates the breadth of industries whose peak representative bodies are absent from the Register:

Industry	Association
Resources, Mining & Fossil Fuels:	Minerals Council of Australia, Association of Mining and Exploration Companies, Australian Forest Products Association
Gambling, Alcohol & Tobacco:	Responsible Wagering Australia, Australasian Gaming Council, Alcohol Beverages Australia
Real Estate, Banking & Insurance:	Australian Banking Association, Real Estate Institute of Australia, Australian Property Institute, Housing Industry Association
Others:	Business Council of Australia, Australian Industry Group

The leadership of many influential industry bodies features prominent former politicians and senior government advisors, highlighting the 'revolving door' operating beyond the reach of the Code and Register. Examples include:

- **Australian Banking Association (ABA):**
  The ABA opposed the Hayne Royal Commission into banking industry misconduct when it was announced by the Turnbull Government in 2017.[15] The current CEO is former Finance Minister Simon Birmingham, who replaced former Queensland Premier Anna Bligh. Other senior staff include former advisors to Prime Minister Scott Morrison.[16]
- **Business Council of Australia (BCA):**
  The BCA has a long history of political advocacy including for company tax cuts,[17] pro-business industrial relations policy,[18] and mixed advocacy on climate change targets.[19] The BCA's current executive team comprises former senior advisors to the Prime Minister, NSW Premier, and other federal ministers.[20]
- **Responsible Wagering Australia (RWA):**
  The peak body for the online gambling industry has been instrumental in opposing reforms proposed by the Murphy Review into online gambling. Its current Chair is former Howard Government Finance Minister Nick Minchin. Other former key personnel include former Communications Minister Stephen Conroy, and former Sports Minister now Senator, Richard Colbeck. RWA's current CEO was former Chief of Staff to Minister for Social Services Anne Ruston, and states on his LinkedIn that he specifically worked on online gambling policy in this portfolio.[21]

These examples demonstrate that industry associations are not passive representative bodies. They are active participants in national policy debates whose lobbying should be subjected to scrutiny.

CASE STUDY:

A bank asks its industry association to argue against proposed financial regulation. The association meets ministers on behalf of the banking sector. Under the current federal rules, the industry association is not required to register as a lobbyist.

04 The Revolving Door Phenomenon

"In a world where influence is a commodity, the ability to influence is itself tradeable with the capacity to skew outcomes to benefit those who can hire the best connected lobbyists rather than produce the best result for the public benefit." [22]

— **Peter Coaldrake AO**

CASE STUDY:

A senior adviser resigns from their role in a minister's office. The following month, they are employed in a government relations role for a company seeking to influence government policy. They know the ministers, understand the policy process and have relationships built during their public service. These attributes are now being used to advance their new employer's commercial interests. There are no transparency obligations or restrictions on this conduct under the current lobbying rules.

A major political integrity risk is the frequent movement of former government personnel — including ministers, assistant ministers, political advisors, and public servants — directly into professional lobbying roles.[23] This phenomenon is known as the 'revolving door'.

Former ministers, advisers and public servants should be able to pursue private sector careers after public service. However, this employment can pose a direct threat to the actual and perceived integrity of government decisions by allowing individuals to leverage experience, knowledge, skills or contacts gained while serving the public interest to deliver private commercial gain. It is for this reason that oversight and safeguards are necessary.

These integrity risks are magnified in a system where large corporations with enormous financial resources are able to spend big money hiring experienced and well-connected political insiders to represent their narrow commercial interests.

This creates a very uneven playing field where wealthy corporations and individuals enjoy substantially more political representation than other interests.[24]

"Transparency is the key to protecting against corrupt lobbying and corrupt government decision making."[25]

— **The Hon. Ann Vanstone KC**

4.1 Former Government Representatives

CASE STUDY:

A former state premier is employed by a lobbying firm to represent their clients in Canberra. Under the current rules, they are not required to report their role as a 'former government representative'.

Under the Lobbying Code, certain ex-federal government representatives are required to disclose their former roles and these are listed on the Register. These people include former ministers, ministerial advisors, senior public servants, and senior members of the Australian Defence Force.[26]

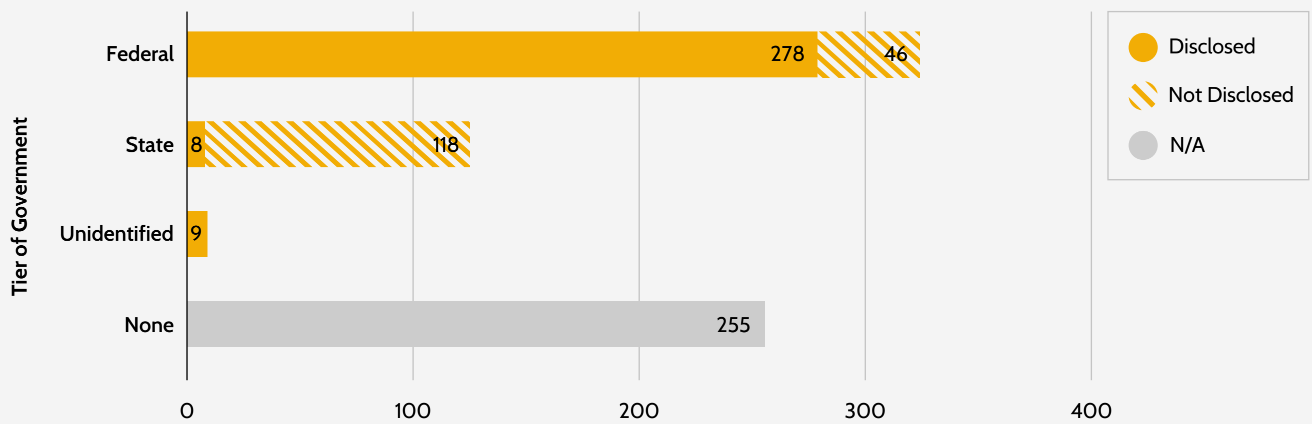
But Australians only see part of the picture. There are many other registered lobbyists with government and political experience that are not required to disclose these former roles. This includes former federal and state politicians, their advisors, and political party officials. These individuals likewise bring important knowledge and connections to their lobbying roles and should be subject to similar scrutiny.

To understand the full extent of the revolving door, we used publicly available information to review the employment history of every registered lobbyist on the federal Lobbyist Register.

Of the **714** registered lobbyists, almost two-thirds (64%) were former government representatives. **295** (41%) disclosed former government experience, and **164** (23%) lobbyists had government experience they did not disclose (most of these were not required to disclose under the current rules). **255** (36%) lobbyists had no government background.

Our analysis shows that the current Code is failing on two fronts. First, a narrow definition of 'government representative' means that many lobbyists with government experience and connections can evade scrutiny. And second, a lack of enforcement mechanisms means that a small number of lobbyists who fail to comply with disclosure requirements are unlikely to face accountability anyway.

Former Government Representatives on the Lobbyist Register



4.2 Former Political Representatives

Corporations and lobbying firms seeking political influence naturally employ people with the strongest political networks. Of the **459** former government representatives, most (**338**) are former political representatives, such as former ministers, politicians, or advisors.

We identified **22** former ministers or assistant ministers from both major political parties now working in lobbying roles. This includes **Christopher Pyne, Julie Bishop, Michael Keenan, Robert Hill**, and **Zed Seselja** (Coalition), and **Gary Gray, Joel Fitzgibbon, Lindsay Tanner**, and **Stephen Conroy** (Labor). These persons all disclosed their former roles as required under the Lobbying Code.

The revolving door extends well beyond the Cabinet. A further set of **21** former federal and state politicians were identified. This list includes former federal **Labor MPs Belinda Neal, Graham Perrett** and **Bernard Ripoll**. Former state politicians identified included three former premiers **Paul Lennon** (Labor, Tasmania), **Morris Iemma** (Labor, NSW), and **Robert Borbidge** (Coalition, Queensland). These people are currently exempt from disclosure requirements, although some had done so voluntarily.

Political influence is not limited to elected office. Senior party officials also develop extensive political networks that can be valuable in lobbying roles, but there is no requirement for these officials to disclose their roles under the Code. We identified several high-profile former party officials now working as registered lobbyists including former Liberal Party Vice President **Tom Harley**, former Liberal Party Federal Director **Sir Lynton Crosby AO**, and former Queensland Labor State Secretary **Evan Moorhead.**

Former government representative:
Someone who has worked in the public service or politics. Defined by the Lobbying Code to only cover federal government representatives, but in our report refers also to former state government representatives.

Former political representative:
A subset of former government representatives who have worked in political offices (e.g. as or for a minister, parliamentarian, or political party).

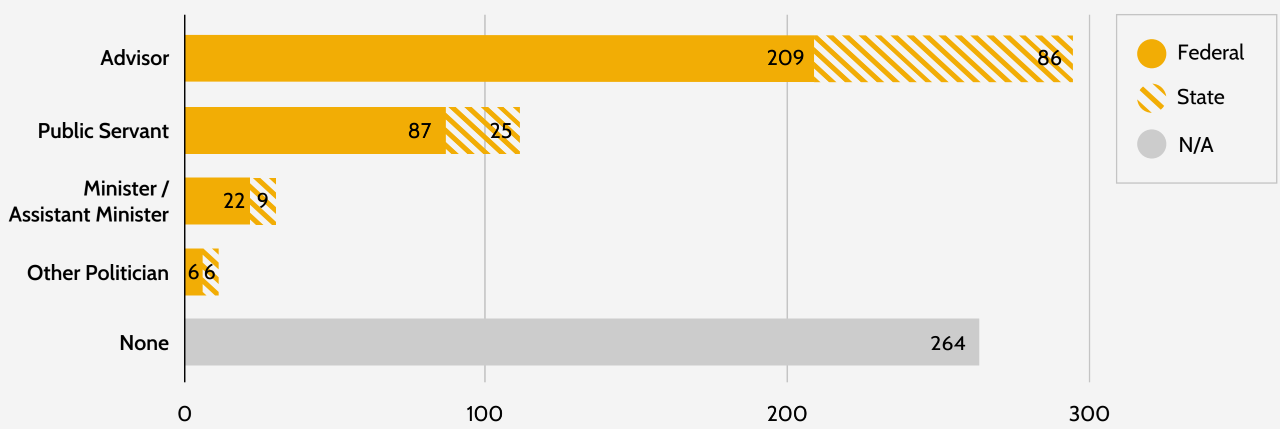
Former Labor Party Lobbyists include:

Gary Gray	Graham Perrett
Joel Fitzgibbon	Bernard Ripoll
Lindsay Tanner	Paul Lennon
Stephen Conroy	Morris Iemma
Belinda Neal	Evan Moorhead

Former Liberal Party Lobbyists include:

Christopher Pyne	Zed Seselja
Julie Bishop	Robert Borbidge
Michael Keenan	Tom Harley
Robert Hill	Sir Lynton Crosby AO

Roles of Former Government Representatives



The employment history of former political representatives is dominated by the major parties. Of **338** former political representatives, **163 (48%)** were affiliated with Labor, **137 (41%)** the Coalition, and only **6 (2%)** with other parties and independents. We were unable to identify the former political affiliations of a further **32 (9%)** former advisors.[27]

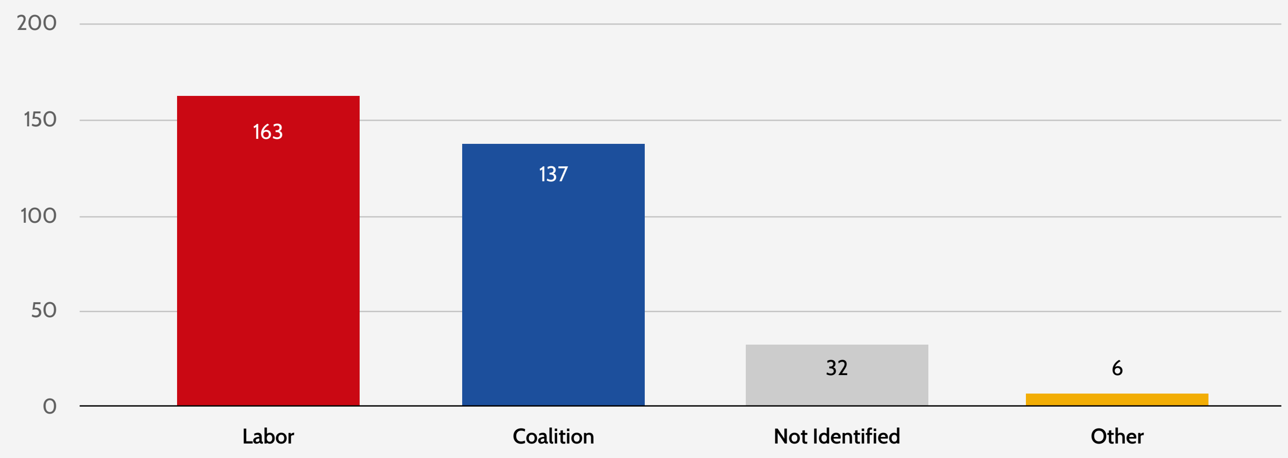
It is not surprising that the prior political employment of registered lobbyists skews towards the traditional parties of government, as clients would likely prefer lobbyists that are well connected with decision-makers. However, the consequence is that the political perspectives represented in Canberra are dominated by Labor and Coalition allies. At the last federal election, 65% of Australians gave their first preference to these parties, and this number is declining. The emergence of independents and One Nation as significant political forces is further fragmenting the political landscape.

As Australia's voting patterns become more diverse, the lobbying industry continues to be dominated by experience drawn from Labor and the Coalition. The absence of other political viewpoints amongst registered lobbyists points to a political class that is increasingly disconnected with the public.

"Secrecy in lobbying breeds perceptions of undue influence and diminishes trust in government decision-making, both of which enhance the risk of corruption" [28]

— **NSW Independent Commission Against Corruption (ICAC)**

Party Affiliation of Former Political Representatives



4.3 Lobbying Bans

While former government representatives should be allowed to find future employment in the private sector, this must be accompanied with strong safeguards and oversight to protect political decision-making.[29]

Lobbying bans (also referred to as 'cooling-off periods') recognise that political influence does not disappear the day someone leaves government. The primary value proposition of many lobbyists to their clients is not necessarily policy expertise, but privileged access, insider political knowledge and an extensive contact list. Absent strong protections, there is a very real risk that former ministers, politicians, and their advisors may use the information and contacts collected during their time in parliament to advantage private-sector clients at the expense of public interest outcomes.

Time-limited lobbying bans are one way to manage these risks, with the view that the value of a former official's insider information and contacts fades over time. The Lobbying Code currently includes the following mandatory lobbying ban periods:

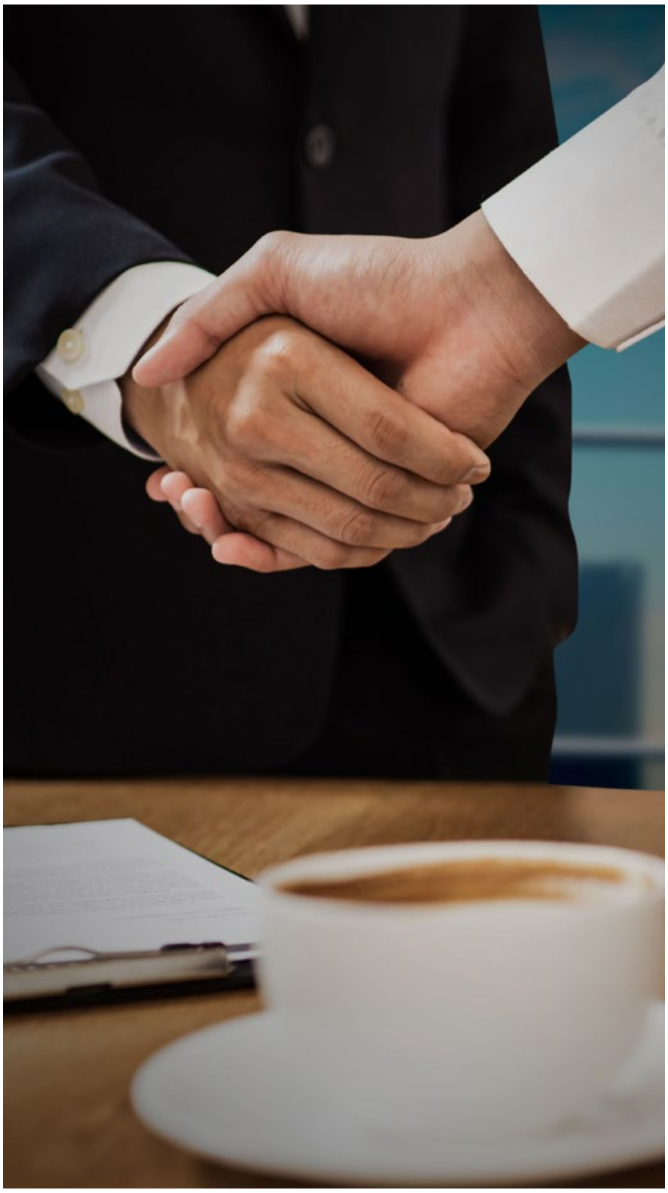
- **Ministers and Assistant Ministers[30]:** 18-month ban on lobbying on matters they had "official dealings" with in their last 18 months in office.[31]
- **Former ministerial advisors, ADF members** (ranked Colonel and above), and **senior executive public servants:** 12-month ban on matters they had official dealings with in their last 12 months of employment.[32]

For ministers, similar obligations are replicated in the Ministerial Code of Conduct.[33] Notably, in-house lobbyists are not subjected to any lobbying ban periods.

Australia's restrictions are relatively short and narrow by international standards. In Canada, "designated public office holders" are banned from being paid to lobby for a period of five years. The definition of these public officials includes ministers, ministerial advisors, and heads of government agencies.[34] In the United States, a lifetime ban applies to all employees in the executive branch of government lobbying on matters they worked on "personally and substantially" while in government, and a two-year ban applies to a broader range of matters.[35] Even other Australian jurisdictions have stronger lobbying ban periods. For example, Queensland and South Australia have a two-year lobbying ban for former ministers.[36]

The current prohibition periods are insufficient to protect public interest decision-making from undue influence. An 18-month lobbying ban fails to provide appropriate 'cooling off' time between a former representative's public role, and their work as a lobbyist. This means commercial interests are able to benefit from the experience, knowledge, skills or contacts held by the former representative.

Further, the narrow application to matters a representative had "official dealings" with is not defined, practically impossible to enforce, and fails to consider that, for many revolving door lobbyists, it is the personal contacts that are the greatest source of influence, rather than knowledge of a specific policy area.



05 Conclusion

Lobbying can help people bring legitimate concerns to the government, but corporations have seized control of the system. Australia's federal lobbying framework is structurally inadequate, operating with critical deficiencies that pose a systemic risk to the integrity of our democracy.

This report points to three core issues: critical loopholes that render the most powerful vested interests invisible, an extensive revolving door phenomenon, and a weak restriction system that fails to safeguard our democracy from undue influence.

The risks associated with these flaws are profound, extending beyond individual misconduct to the potential for systemic corruption at the federal level and the distortion of public decisions in favour of commercial interests. When the flow of influence is unscrutinised and unrestricted, the public cannot discern whether policy decisions are made in the national interest or in the favour of well-resourced private stakeholders.

The integrity of the democratic process has been compromised by unchecked corporate lobbying. Restoring public confidence demands decisive action by implementing the recommendations in this report.

06 Appendices

Appendix 1. Completed Inquiries into Lobbying, Access, and Influence in the last 5 Years.

Jurisdiction	Year	Body	Title
New South Wales	2021	Independent Commission Against Corruption (ICAC)	Lobbying and the NSW public sector - the regulation of lobbying, access and influence in NSW (Operation Eclipse)
Queensland	2022	Independent review by Professor Peter Coaldrake AO	Let the sunshine in - Review of culture and accountability in the Queensland public sector
South Australia	2024	Independent Commission Against Corruption (ICAC)	The room where it happens - Lobbying and influence in South Australia
Tasmania	2025	Integrity Commission	Recommended model for lobbying oversight
Victoria	2022	Independent Broad-based Anti-corruption Commission (IBAC)	Corruption risks associated with donations and lobbying

Appendix 2. Current Inquiries into Lobbying, Access, and Influence.

Jurisdiction	Year	Body	Title
Australian Capital Territory	Ongoing	ACT Integrity Commission	Inquiry into arrangements for lobbying and influence in government in the ACT
Queensland	Ongoing	Office of the Queensland Integrity Commissioner	Review into the Queensland Registered Lobbyists Code of Conduct
South Australia	Ongoing	Independent expert panel - Court of Appeal President Mark Livesey, Prof John Williams, Prof Peter Sandeman	N/A
Victoria	Ongoing	Department of Premier and Cabinet	Lobbying reform consultation

Endnotes and Image Credits

1 Victoria Independent Broad-based Anti-corruption Commission, *Special Report on Corruption Risks Associated with Donations and Lobbying* (2022) p 33.
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7 Refer to *Appendix 1*.
8 Transparency International, *Behind Closed Doors: A Comparative Jurisdictional Analysis of Australia's Lobbying Rules* (2025).
9 Refer to *Appendix 2*.
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11 Data current as of March 2026. Australian Government, Attorney-General's Department, *The Lobbyist Register* (2026).
12 NSW Independent Commission Against Corruption (ICAC), *Lobbying and the NSW public sector - the regulation of lobbying, access and influence in NSW (Operation Eclipse)* (2021) p 30.
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14 Christina Watts, Melissa Jones, Kylie Lindorff, Becky Freeman, *How Tobacco Companies Use The Revolving Door Between Government And Industry To Influence Policymaking: An Australian Case Study* (2023).
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25 Ann Vanstone, Independent Commission Against Corruption, *The Room Where it Happens – Lobbying and Influence in South Australia* (2024).
26 Australian Government, Attorney-General's Department, *Lobbying Code of Conduct* (2022) s 5(1).
27 These persons include those who state publicly (e.g. on their lobbying firm's website) that they have experience working as a former ministerial advisor, but where it was not possible to identify which minister.
28 NSW Independent Commission Against Corruption (ICAC), *Lobbying and the NSW public sector - the regulation of lobbying, access and influence in NSW (Operation Eclipse)* (2021) p 54.
29 Transparency International Australia, *Position Paper: Revolving Doors* (2025).
30 The Lobbying Code refers to Parliamentary Secretaries. We have used the term Assistant Minister throughout this report as this is the more commonly understood term for this role.
31 *Lobbying Code of Conduct* (Cth) (2022) s 11(1).
32 Ibid s 11(2).
33 Department of the Prime Minister & Cabinet, *Code of Conduct for Ministers* (2025) s 7.1.
34 *Lobbying Act 1985* (Canada) s 10.11.
35 18 *US Code* (United States) s 207.
36 *Integrity Act* (Qld) s 62; *Lobbyists Act* (South Australia) s13.

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