



**AUSTRALIAN
CONSERVATION
FOUNDATION**

Committee Secretary
Joint Standing Committee on Electoral Matters
PO Box 6021
Parliament House
Canberra ACT 2600

12 October 2022

Submitted via email: em@aph.gov.au

ACF Submission

Inquiry into and report on all aspects of the conduct of the 2022 federal election and matters related thereto

Dear Committee Members,

The Australian Conservation Foundation (ACF) would like to thank you for the opportunity to make a submission to the Joint Standing Committee on Electoral Matters.

ACF is Australia's national environment organisation. We are half a million people who speak out for the air we breathe, the water we drink, and the places and wildlife we love. ACF is proudly independent, non-partisan and funded by donations from our community.

ACF has been, since its creation some 50 years ago, the leading national advocate for the environment. ACF protects, restores and sustains Australia's environment through research, consultation, education, partnerships and advocacy. ACF is strictly non-partisan and we are proud of our political independence. Over the past 50 years our independent advocacy has helped drive extraordinary commitments from governments of all political persuasions as well as from business and communities.

We welcome the opportunity to provide input into the operation of Australia's electoral laws, particularly as they impact charitable organisations like ACF. Our submission focuses on the significant negative impacts caused by the recent changes to the Significant Third Party provisions under the *Commonwealth Electoral Act 1918* (Electoral Act), before highlighting a number of opportunities we see for positive reform.

Summary of recommendations

ACF urges the Committee to consider the following recommendations:

- The threshold for becoming a Significant Third Party be increased back to \$500,000 in electoral expenditure



- The definition of electoral expenditure for significant third parties be reverted back to the prior definition under section 287AB of the Electoral Act
- The Committee explore opportunities to reduce the administrative burdens related to the foreign donor requirements for significant third parties while maintaining the integrity of the electoral system
- Ensure that all electoral law reforms which could impact the charitable sector are the subject of extensive and detailed consultation with the sector prior to introduction. The administrative burden of reforms should be robustly assessed as part of the consultation process
- Reforms to lower the donation disclosure threshold and introduce real time disclosure for political parties, candidates and associated entities should be introduced without delay
- The donation disclosure threshold should be lowered to \$1000 and real time disclosure introduced for political parties, candidates, and associated entities
- Introduce a timelier system of disclosure for third parties and significant third parties for donations and expenditure relating to electoral matter
- The definition of gift be amended to capture membership fees, ticket prices and other types of income raised through fundraising or other events for which the primary purpose is raising money for a political party or candidate
- 'Other receipts' should be further classified by income stream, with any amounts not falling into a category required to be itemised with a description of the nature of the amount
- Introduce electoral expenditure caps for political parties, candidates, associated entities, significant third parties, and third parties
- Introduce donation caps for political parties, candidates, and associated entities

1. Changes to the significant third party category

In late 2021, the previous Coalition Government introduced, and later passed, the *Electoral Legislation Amendment (Political Campaigners) Act 2021* (Political Campaigners Act). The legislation made a number of changes to the Electoral Act, including amending the threshold for when an organisation would become a Political Campaigner (now called and herein referred to as significant third party) and applying an additional, extended definition of 'electoral expenditure'.

Importantly, the Political Campaigners Act was applied retrospectively to capture expenditure in the previous 3 years (including the period prior to the 2019 Federal election), meaning that some charities, including ACF, suddenly found themselves classified as significant third parties as result of activities occurring prior to the 2019 Federal election.

It is worth taking a moment to acknowledge the rushed and confusing process by which these reforms were ushered in. When first introduced, the Political Campaigners Act totalled seven pages and made a single change to the Electoral Act: to lower the threshold for becoming a significant third party from \$500,000 to \$100,000, or one-third of an organisation's revenue. Then, just prior to the third reading and passing of the bill in the House of Representatives, the Morrison Government introduced amendments which more than doubled the length of the bill to fifteen pages, adding a number of very significant and serious amendments. This left impacted organisations and Members of Parliament alike scrambling to understand the full impact of the amended bill.



No consultation was conducted with impacted charities prior to the introduction of the bill or the amendments. In the 172 submissions made to the JSCM committee during the review of the 2019 federal election, no evidence for the need for these changes was presented nor was an evidentiary basis for the changes given in the committee's final report.

These changes were rushed, lacked consultation, and lacked an evidence base. ACF considers these changes to be poor public policy, achieved via a deficient process.

While ACF (along with many others) opposed the passing of this bill altogether, we are thankful to the members of the Senate who supported important amendments to raise the threshold to \$250,000 and change the name of the category from political campaigner to significant third party. This change of name was extremely important as the term "Political Campaigner" conflates advocacy undertaken by charities with political campaigning undertaken by political parties and candidates.

Impact of the changes to the significant third party category

The changes to the significant third party category have had a significant negative financial impact on ACF. We calculate that, since coming into law, it has cost our organisation over \$50,000 to comply with the changes, and that there will be a substantial continued cost to compliance. This cost has been calculated by adding up the staff time that we have needed to redirect from other services and activities to ensure compliance with the laws.

As a charity, ACF is focused on and committed to ensuring that all the donations we receive are used as effectively and efficiently as possible to achieve our charitable purpose. Donors want and expect their donations to create impact in line with our charitable purpose, not to be used for unnecessary red tape, however the impact of this law has been just the opposite.

ACF recognises that charities operate in significantly different ways to political parties, and further detail may be helpful regarding how the above costs have been calculated. For this reason, below we outline in detail what compliance has looked like within ACF, and what the negative impacts have been.

1. One-off costs

As the reforms were ushered in quickly, and applied retrospectively, ACF needed to rapidly assess our responsibilities and requirements under the amendments. Understanding the new laws and developing systems that would allow us to comply diverted significant resources from our in-house legal counsel, and senior staff in our fundraising and finance directorates.

Importantly, not only did ACF need to rapidly analyse and understand how the amendments impacted the totality of our obligations under the Electoral Act—particularly as the amendments inserted significant third parties into parts of the Electoral Act previously only applying to political parties and candidates—we also needed to undertake measures to operationalise and formalise operating procedures for compliance for the whole of the organisation. This included multiple policy documents, including a 19 page policy and procedure on handling foreign donations, a procedure for legal review of all expenditure incurred around the election, and multiple communiques and trainings for staff.



ACF was lucky to benefit from generous pro bono support from the legal community to get on top of the new regime. However, that has an opportunity cost given there is a finite amount of pro bono assistance available. We estimate the legal costs alone, associated with this process for an organisation that did not have in-house counsel or pro bono support, would be in the order of \$30,000.

2. On-going costs

The largest cost to ACF has been complying with the foreign donor requirements which apply to significant third parties. The requirements are highly complex, as is applying them to the myriad of ways in which donations (including bequests and grants) may come in to ACF. To ensure compliance, ACF has needed to develop a 19 page policy and procedure just on compliance with the foreign donor provisions.

Under the Electoral Act, significant third parties are required to receive an affirmation of citizenship status from all donors who make a gift of \$1000 or more within 6 weeks of gift receipt. For donations over the donation disclosure threshold (currently \$15,200), significant third parties are required to also obtain physical evidence verifying that a donor is an Australian citizen or permanent resident within 6 weeks of receiving the donation.

Both requirements are not at all straightforward and are extremely onerous given the volume and variety of donations that ACF receives.

We estimate that it takes ACF staff on average one hour per donor in order to comply with the requirements. However, in some cases, it has required ACF staff to spend up to 5 hours or more in attempting to confirm the status of a single donor.

Why it is extra complicated for charities to confirm donor status?

ACF is 100% independently funded and receives donations from a variety of means including over the phone, online, direct debit, in person and via the mail; through gifts in wills; through workplace giving; through grants; and through third-party online donation platforms such as MyCause or GiveNow. For each of these donation pathways ACF must have a specific procedure for confirming and documenting the citizenship status of the donor.

At a minimum, ACF must take the following steps for all donations of \$1000 or more:

- i. Call the donor to explain the significant third party requirements. This can often be a confusing interaction for the donor as they are not familiar with the legislation and do not understand why their donation for a charitable cause unrelated to electoral matter requires verifying their citizenship status.
- ii. Send an email or certified letter asking the donor to reply confirming that they are an Australian citizen or permanent resident, or, for a business, that their principal place of business is Australia.
- iii. Document this interaction in our donor database.

While this process can, at times, be straight forward, at other times it has been extremely time consuming and difficult to complete this process. In addition, this process must be taken for hundreds of donations, none of which are spent on electoral matter, making it all the more



burdensome. To illustrate this fact, we have provided three case studies which show some of the complexities that can be faced. As none of the donations in the following examples has been used to incur electoral expenditure all donor information has been anonymised.

Case study 1: Mail in donation from LM Wilson

ACF has many supporters who have, for some time, chosen to mail in donations in the form of cheques. These cheques often come with little to no details on them, other than the person's name and mailing address. This makes it impossible to phone them to discuss their citizenship status.

Such was the case for LM Wilson. ACF followed up with the donor with a letter via registered post, explaining the new significant third party requirements and asking that they confirm their citizenship status in writing. However, our letter went unanswered. The name in this instance was also incomplete and common, making further identification via any online searches impossible.

In this instance, ACF was required to send three registered letters to the donor, stressing the importance of replying to our request before we finally received a reply. This is a significant volume of communication to donors who may not understand the reason for the information we are requesting and could lead to less positive relationships with the donors and a reduction in donations.

In addition, we knew from the address that LM Wilson was in an area that had just been impacted severely by the February flooding in the Northern Rivers region of NSW. We did not know if they had been displaced from their home at worst, or at best if our letters were viewed as insensitive.

This one instance required multiple hours of staff time in following up with the donor, as well as placing a negative strain on a donor relationship, in order to confirm that LM Wilson was, in fact, an Australian citizen

Case study 2: Confirming the citizenship status of a deceased estate

ACF is incredibly fortunate that many of our donors choose to leave a gift to ACF in their wills. Estates can be particularly complicated to navigate as we are interacting with families during a difficult and stressful period, or with solicitors who have an obligation to protect the individual's privacy.

In the case of Mr. Ian Jones, ACF was first contacted by Mr. Jones' daughter notifying ACF of the gift of \$2000 in Mr Jones' will. Several emails and a phone call were exchanged with the daughter explaining the foreign donor requirements and the documentation we required.

After multiple emails with the daughter, we were put in touch with a lawyer who was acting as the executor of the estate. Several emails were exchanged with the lawyer, including the lawyer responding with a number of detailed questions about the Political Campaigner Act which our team was then required to research and respond to.



Finally, after weeks of back and forth with the lawyer, he put ACF in touch with Mr. Jones' wife to send us through the required documentation.

In total, it took ACF several weeks and multiple hours of staff time to confirm that Mr. Jones was, in fact, an Australian citizen.

Case study 3: Tracking down individual donors who have made donations through third-party fundraising platforms

ACF frequently receives donations through third party fundraising platforms such as Go Fund Me or My Cause. Examples of why ACF may receive donations through a third-party platform include community fundraising initiatives where individuals choose to raise money for ACF as part of an activity (e.g., a charity run) or for 'workplace giving', where employees of a company choose a charity to collectively contribute donations to.

Third-party platforms are an important and necessary tool in many charities' fundraising models; however, they present an extra level of complexity when it comes to verifying the citizenship status of donors.

ACF receives donations raised through third-party platforms in a lump sum, sometimes without a list of names and donation amounts. No other information about the donor can be provided to ACF due to privacy requirements of the third-party platform.

When ACF receives a donation via a third-party platform, we must first obtain a list of donors and review the list to identify any donations over \$1000. It is then up to ACF to track down any donors who donated over \$1000 with the limited information we have, often just a name.

In some instances, we must contact the individual who raised the funds to ask their assistance in contacting the friend or family member who made the donation. This is a time consuming and confusing process, especially for the individual who donated to their friend's or family's cause, and then is contacted out of the blue to verify their citizenship status.

A recent case involved a donor who made a donation in British pounds via the platform Benevity. In this instance we had weeks of follow up with Benevity themselves to try and get a breakdown of the donations. We then had to convert the donation from pounds to AUD using the conversion rate of the day of disbursement and found one donation which was just a few dollars over \$1000 AUD. We then began the process of getting in touch with the donor, which was difficult as we only had their rather common name and the name of the workplace the donation was made from. We were eventually able to find an individual who we thought may be the donor via LinkedIn. After a few messages we were able to confirm that this was the donor and that they were, in fact, Australian.

Reaction from donors to the foreign donor requirements

It is worth noting that the reaction from donors when contacted by ACF has been consistently one of confusion and, at times, frustration. Donors have been supportive of ACF however have regularly



offered vocal criticism of the rules as ‘red tape’ and an absurd waste to time. On occasion this has led to criticism of the previous Government for introducing these rules, however, could lead to continued criticism in the future.

Furthermore, the requirements themselves and the frequent following up that ACF has had to do with donors to comply with the law could lead to a strain in relationships with donors and a potential reduction in donations to ACF.

There is no public interest benefit in applying the significant third party provisions to charities

The changes to the significant third party provisions have come at a significant cost to ACF, and it is difficult to see what, if any, public interest benefit the application of these laws on charities brings.

Charities are already heavily regulated and must act in furtherance of their charitable purpose. They are explicitly forbidden from a primary purpose of supporting a political party or candidate for office. As a charity, ACF already reports publicly on our income sources. The significant third party provisions do not actually add any additional transparency, however instead, just tie charities like ACF up in red tape.

Instead, the integrity of our electoral system would be much better served by focusing on increasing the transparency of the vast amounts of dark money in our political system and better regulating powerful industry lobbies which can deploy vast amounts of money and soft power to distort the political process in their favour, and do so with very little transparency or regulation.

The changes to the definition of electoral expenditure for significant third parties under the Political Campaigner Act should be repealed

Around elections, charities must apply a complicated definition of ‘electoral matter’ to much of their expenditure in order to determine which activities meet the definition of electoral expenditure and are thereby reportable. The definition of electoral matter under section 287AB of the Electoral Act was reached after extensive consultation with the sector and was carefully crafted to ensure that expenditure aimed at influencing voters at elections was captured, while excluding other public interest and charitable advocacy activities.

One of the most significant changes made by the Political Campaigner Act was to insert significant third parties into section 287AB(3) of the Electoral Act. In doing so, the definition of electoral matter for significant third parties was vastly expanded to include ‘any matter before an election’. This definition should not apply to significant third parties because it captures the everyday charitable advocacy activities of charities like ACF and expands reportable expenditure beyond what is electorally relevant.

Charitable advocacy helps make Australia a better and fairer place to live. Because of advocacy, we can snorkel on a Great Barrier Reef without oil rigs and the Franklin River still flows. We have the NDIS, privacy laws, and unleaded petrol, to name just a few achievements won through advocacy. Australians trust charities and care about the causes we fight for - supporting our efforts in huge numbers.

Advocating and encouraging public debate around important public interest issues is an important democratic function played by charities, and should be encouraged, not dampened. Yet, the



expanded definition under section 287AB(3) conflates charitable advocacy with political campaigning, and makes it harder for charities to speak out around elections—arguably one of the most important times for robust and evidenced based public debate to occur. ACF strongly recommends that the amendment inserting significant third parties into section 287AB(3) should be repealed.

RECOMMENDATIONS

ACF strongly recommends that the following aspects of the Political Campaigner Act be rolled back:

- increase the threshold back to \$500,000 in electoral expenditure
- revert back to the prior definition of electoral expenditure for significant third parties under section 287AB of the Electoral Act.

In addition, ACF recommends that the Committee explore opportunities to reduce the administrative burdens related to the foreign donor requirements for significant third parties while maintaining the integrity of the electoral system.

2. Opportunities for positive electoral law reform

The Australian Conservation Foundation strongly supports reforms to strengthen the integrity of Australia's federal donations and electoral expenditure regime, including greater transparency of political funding; caps on political donations to parties; caps on election spending; a fair system of public funding of political parties and candidates; and more effective regulation of lobbyists.

These reforms are critical to bringing greater integrity and public confidence to Australian federal politics. ACF supports electoral law reforms which seek to achieve the following objectives:

- Reduce undue influence of vested corporate interests in Australian politics,
- Provide greater transparency over the sources of political funding and expenditure,
- Level the playing field to ensure a fair contest between large and small parties and independents in elections,
- Restore public faith in our democratic institutions, and
- Promote participation: protect the ability of civil society organisations, especially small, grassroots community organisations to participate in democratic debates.

Protecting charitable advocacy and diverse voices at election times

A thriving democracy needs many voices and robust and vibrant public debate. It works for everyone and represents everyone. Australian not-for-profits and charities have a long, proud history of speaking up for those who may not be able to have their voices heard, asking hard questions, and holding governments to account.

ACF activities involve advocacy. By 'advocacy' we simply mean influencing decision-making in the interests of conservation and sustainability. These activities inevitably involve generating public awareness and debate over an issue and through that, encouraging legislative and/or policy change to protect the environment and the people, plants and animals that depend upon it.

Around elections and under the definitions relating to significant third parties, ACF's regular advocacy activities could be classified as electoral expenditure, for example if we encourage voters



to think about climate change policy when they go to the polls. These advocacy activities serve a public interest purpose and have an important role to play in facilitating and encouraging debate and policy engagement, especially during elections. It would be wrong to conflate such activities with partisan political campaigning.

The High Court of Australia in the *Aid/Watch Incorporated v Commissioner of Taxation*¹ (Aid/Watch) left no doubt that advocacy activities aimed at policy or legislative change may be charitable as they are, in themselves, activities beneficial to the community.

Over the past several years, ACF has participated in a number of inquiries concerning various efforts to reform electoral law. Through this, we have developed an in depth understanding of just how complicated, and important, the details of the reforms are and how, when poorly consulted, even well-intentioned reform can inadvertently stifle community voices and public debate. Regulating third parties in elections continues to be a deceptively complicated aspect of reform of political funding and disclosure, in no small part due to the diversity of types of third parties, the spectrum of purposes for which they exist, and the diverse ways they receive their income.

Unlike political parties and candidates, which exist for the purpose of contesting elections and winning office, third parties exist for a variety of purposes, including charitable or public interest purposes. Unlike donations to political parties and candidates, which serve to help these groups stand for election and win office, third parties receive donations for many purposes, the vast majority of which are unrelated to a political or electorally relevant purpose.

ACF supports reforms that will require greater transparency of third party donations and expenditure *that is spent on electoral matter*, however, does not support a broad-brush approach which treats third parties in an identical way as political parties and candidates, or which conflates issue-based advocacy with political campaigning. We stress the need for careful consultation, particularly with the charitable sector, on the detail of reforms.

Measures to improve the transparency of money in politics

Reform to improve the transparency of money flowing into the political system is long overdue and is necessary to maintain public confidence in our political system. In the 2018/19 fiscal year, which included the 2019 Federal Election, ACF analysis found that over \$100 million worth of income to the Labor and Coalition parties had no identifiable source². This is an unacceptable amount of dark money and erodes public confidence in our political system.

Unfortunately, even though the 2022 federal election is now several months behind us, Australians won't find out who donated to political parties and candidates in the lead up to the election for another 4 months and, even then, weak transparency laws mean up to 40% of the money flowing into the system will remain hidden.

ACF supports the following reforms and policy settings to improve transparency and bring greater integrity to our political system:

¹ *Aid/Watch Incorporated v Commissioner of Taxation* [2010] HCA 42

² Australian Conservation Foundation (2019), 'Fossil Fuel Money Distorting Democracy', available at https://www.acf.org.au/fossil_fuel_money_distorting_democracy



- i. Lowering the disclosure threshold to \$1000 and requiring real time disclosure for political parties, candidates, and associated entities

ACF welcomes the federal Labor Government's proposal to lower the donation disclosure threshold to \$1000 and to introduce real-time disclosure for candidates, political parties, and associated entities. Disclosure should be done via an online portal which is easy to navigate and accessible to the public.

ACF supports a lower disclosure threshold for income used by third parties on electoral matter. As is currently the case under the Electoral Act, it is important to ensure that only electorally relevant income is required to be reported under electoral laws.

Further, real time disclosure should not apply to third parties or significant third parties. It is much more difficult for third parties to comply with real time disclosure than it is for political parties or candidates, and the public interest benefits of doing so are significantly less than in the case for political parties, candidates, and associated entities.

Disclosure of donations is very different for charities than it is for political parties or candidates. For political parties and candidates, all gifts are political donations and gifts over the disclosure threshold must be declared. Charities do not receive political donations but instead receive philanthropic donations throughout the year towards their charitable purpose. As elections near, charities must apply complicated definitions of electoral matter to determine if their regular advocacy activities qualify as electoral expenditure, and therefore require disclosure. The funds used to incur any electoral expenditure may have been received many months prior, making it impossible for charities to disclose donations in real time.

In addition, the motivations for applying real time disclosure to third parties are significantly less than to other actors in elections such as political parties, candidates and associated entities. For these groups, the additional transparency of real time disclosure aims to achieve three objectives: First, it seeks to maintain public confidence by providing greater transparency over the source of money used in campaigning around elections. Second, it allows voters to make more informed decisions when choosing who to vote for in elections by providing information about the financial backers of a party or candidate. Finally, perhaps the primary objective of real time disclosure is to deter or expose undue influence (including criminal corruption) which may arise through large or frequent political donations³.

Only the first objective applies to third parties and significant third parties in elections. Whereas candidates and political parties stand to end up in positions of power where they control or have influence over public resources, planning and decision-making processes, third parties can only advocate for government or voters to take particular action and are removed from actual decision-making processes. The same risk of corruption, and therefore motivation for real time reporting, does not apply.

Instead, third parties can and should be held to more timely disclosure to meet the first objective of increased public confidence. ACF supports a timelier system of reporting for third parties and significant third parties, whereby returns are filed as soon as possible after an election and published in real time via an online portal.

³ Joo-Cheong Tham, 2010, *Money & Politics: the politics we can't afford*, University of New South Wales Press



- ii. Expanding the definition of 'gift' to capture common sources of fundraising income for parties, candidates, and associated entities

Reforms aimed at improving the transparency of money in politics should also address the inadequate and inaccurate categorisation of income sources. Currently, within the AEC framework all income is marked either as a 'donation' or 'other receipt', however lines between the two are frequently blurred. For example, it is often the case that donors will categorise fundraising dinners or other fundraising events as donations, while the party will categorise these as an 'other receipt'.

The definition of 'gift' should be expanded to clearly capture common income streams where the primary purpose is to raise money for a party or candidate. This should include contributions, entry fees, and other payments which entitle an individual or business entry into a fundraising venture or function, and should also include annual or other subscription fees.

- iii. Categorisation of other receipts into clearly identifiable categories

Currently, all party income that does not fit into the narrowly defined definition of 'gift' is disclosable as an "other receipt". No further information is required on returns as to the nature of 'other receipts' leaving voters in the dark about what the purpose of these financial flows to the party are being made for, be it investment income, rent, union subscriptions or for some other purpose.

The 'other receipt' category should be broken down into clearly identifiable categories, including loans, investments, rental income, and party transfers. Any additional income not falling into one of the above categories should be classified as 'other' with the nature of the amount required to be disclosed on the return. A model for how this could be done has been previously presented in Senator Jacqui Lambie's *Commonwealth Electoral Amendment (Donation Reform and Other Measures) Bill 2020*.

- iv. Introduce caps on electoral expenditure

ACF strongly supports calls to place limits on how much candidates, political parties, associated entities, significant third parties, and third parties can spend campaigning during elections. Expenditure limits are necessary to ensure a level playing field in elections and to ensure that it is not simply those with the largest wallets who have the most access to participate in the electoral process, dominate policy debates, or to run for office.

Spending caps should aim to improve current levels of political equality, and therefore should:

- Be lower than the current spending levels of the major parties, which already places an enormous fundraising burden on parties and candidates to run
- Take account of what the average Australian could conceivably raise to run as an independent candidate in a typical electorate
- Account for the benefits of incumbents and party backed candidates such as the additional staffing, printing, and advertising resources available to these candidates. A higher spending cap for independents and small parties should be considered to counterbalance this inherent advantage.

Spending caps should also apply to all participants in elections, including third parties and significant third parties. Given the unique role of candidates and parties to stand for and contest elections, a



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lower cap for third parties and significant third parties is reasonable, provided that they are allowed to operate under independent caps.

- v. Introduce donation caps for political parties, candidates, and associated entities

Capping political donations is an important part of strong, holistic reforms to strengthen the integrity of our electoral system and achieve greater political equality. Caps on donations are necessary in order to reduce the overall amount of money flowing into the political system and are the only measure that can significantly reduce the risk of corruption that comes from influence and access that is gained through political donations. The federal government should follow the example of Queensland, New South Wales, and Victoria and introduce a ban on big donations.

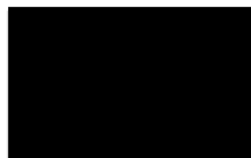
RECOMMENDATIONS

- Ensure that all electoral law reforms which could impact the charitable sector are the subject of extensive and detailed consultation with the sector prior to introduction. The administrative burden of reforms should be robustly assessed as part of the consultation process.
- Reforms to lower the donation disclosure threshold and introduce real time disclosure for political parties, candidates and associated entities should be introduced without delay
- The donation disclosure threshold should be lowered to \$1000 and real time disclosure introduced for political parties, candidates, and associated entities
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- Introduce electoral expenditure caps for political parties, candidates, associated entities, significant third parties, and third parties
- Introduce donation caps for political parties, candidates, and associated entities

Thank you for the opportunity to provide a submission. ACF would be happy to provide further information or appear to provide oral evidence if useful to the Committee.



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