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Committee Secretary
Parliamentary Joint Committee on Intelligence and Security
PO Box 6021
Parliament House
Canberra ACT 2600

By e-mail - pjcis@aph.gov.au

Dear Committee Secretary

Review of Foreign Influence Transparency Scheme Bill 2017

Thank you for the opportunity to comment on the Foreign Influence Transparency Scheme Bill 2017 (the Bill) which seeks to establish a regulatory scheme to improve the identification and transparency of activities undertaken by foreign influences in Australia.

The Property Council is the leading advocate for Australia's biggest industry – property. We are a member-based organisation that represents owners, fund managers, superannuation trusts, developers and investors across all four quadrants of the property investment: debt, equity, public and private.

The Property Council actively engages with policy makers in all Australian jurisdictions, however we do not act on the behalf of any individual member. We advocate in the best interests of the broader industry that we represent.

We are extremely transparent regarding our dealings with Australian governments, including publishing submissions on our website, and have strict internal governance processes and arrangements in relation to our policy development and advocacy activities.

The Property Council supports the Government's efforts to enable greater transparency regarding the sources of foreign influence in Australia's public administration. However, we believe that the Bill as drafted is extremely broad and will adversely impact on a number of industry bodies, including the Property Council, whose activities are on behalf of their broader membership and should be outside the scope of the legislation.

Industry associations that have been constituted to represent the interests of their members are exempted from the Commonwealth Government's Lobbying Code of Conduct and Register of Lobbyists.

The position of industry associations in regard to the scheme is not covered in the Explanatory Memorandum. This should be clarified by excluding associations and membership bodies that act in the collective service of their members from the scheme.

For further information, please do not hesitate to contact Richard Lindsay, Government Relations Manager, [REDACTED]

Yours sincerely

Glenn Byres
Chief of Housing and Policy