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TO: Department of Premier and Cabinet

TO: legalmail@dpc.nsw.gov.au

Reference: Discussion Paper – Statutory review of the Lobbying of Government Officials Act 2011 (NSW)

First of all, a lot of thanks to for Department of Premier and Cabinet organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

PDF file of this opinion can be added to a relevant web page

Annex 1 holds information about previous Australian consultations

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

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42 Previous opinions – many opinions related to information technology

43

44 General page for my previous opinions is following:

45 www.jukkarannila.fi/lausunnot.html

46

47 Annex 1 contains information about previous Australian consultations and my previous opinions.

48

49 Comparison to the European Union – transparency register

50

51 Transparency Register (EU) can be accessed from the following web page:

52 <http://ec.europa.eu/transparencyregister/public/homePage.do>

53

54 **Proposal: There could be some comparisons between these registers – NSW and EU**

55

56 Question of position papers

57

58 I tried to find different position papers of different legal entities.

59

60 **Proposal: NSW register could hold different position papers of different lobbyist.**

61

62 My initial assumption is that many lobbyist (organisations) could add their position papers to the
63 register. Many lobbyist (organisations) would encourage different entities/person to read different
64 position papers.

65

66 Inviting different lobbyist (organisations) for providing position papers

67

68 **Proposal: Registered lobbyist (organisations) could be (electronically) invited for**
69 **adding position papers based on organised consultations.**

70

71

72

73 Good luck!!!

74

75 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
76 opinions. This remains to be seen.

77

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79 [Continues on the next page]

ANNEX 1

General page for my previous opinions is following:

www.jukkarannila.fi/lausunnot.html

Information about previous Australian consultations:

EN: Opinion 54: Government Content Management System

http://www.jukkarannila.fi/lausunnot.html#nro_54

EN: Opinion 56: National Identity Proofing Guidelines

http://www.jukkarannila.fi/lausunnot.html#nro_56

EN: Opinion 57: Updating the Commonwealth Procurement Rules

http://www.jukkarannila.fi/lausunnot.html#nro_57

EN: Opinion 72: Queensland biofuel mandate

http://www.jukkarannila.fi/lausunnot.html#nro_72

EN: Opinion 73: Financial / Conceptual Frameworks

http://www.jukkarannila.fi/lausunnot.html#nro_73

EN: Opinion 78: Consumer Complaints Register (NSW)

http://www.jukkarannila.fi/lausunnot.html#nro_78

EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015

http://www.jukkarannila.fi/lausunnot.html#nro_79

EN: Opinion 85: Regulatory options for automated vehicles

http://www.jukkarannila.fi/lausunnot.html#nro_85

EN: Opinion 87: Assessing privacy and big data on the Internet

http://www.jukkarannila.fi/lausunnot.html#nro_87

EN: Opinion 90: Consent / Information and Privacy Commission NSW (IPC)

http://www.jukkarannila.fi/lausunnot.html#nro_90

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ANNEX 2

125 DISCLAIMERS

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133

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138

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142 worldwide politics.

143

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164 The English explanation is on the following web page:

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1 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenged the three-party system, since three “old” parties were not traditionally as the three largest parties. On 2015 this “new” party is part of the current Finnish Government. We all must be interested about this new development in Finland.