

Introducing an ethical lobbying regulation in Indonesia: A policy recommendation

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Abstract: One of the public participation forms in the democratic setting is the mechanism of lobbying. In various countries, this mechanism has been regulated by the governments in accordance with recommended standards. This paper seeks to examine the international standards and recommendations as well as the implementation of lobbying regulations in multiple countries. The analysis focuses on the efficacy of lobbying regulation in different contexts, including issues such as insufficient disclosure, noncompliance, and enforcement mechanisms, which vary between countries. Our finding is that the efficacy of lobbying regulation in the United States is facing persistent challenges, including insufficient disclosure and potential noncompliance, which require deeper scrutiny and enforcement mechanisms. In Ireland, inadequate mitigation exists in regulating international lobbying and extraterritorial enforcement, a notable deficiency that needs to be addressed and solved. In Australia, however, there has been a progression from minimalistic approaches to more stringent legislative frameworks, albeit predominantly focused on third-party lobbyists, and therefore, there is still a lack of monitoring of other types. This situation underscores the need for comprehensive reform to address waning public trust in democratic institutions. Finally, we propose a recommendation for the lobbying regulation to be applied in Indonesia in order to enhance integrity and promote transparency throughout the policy formulation process.

Keywords: Lobbying; Transparency; Regulation; Democracy; Policy-making

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Introduction

Democracy and political participation

Trust in democracy and political participation has been fluctuating across the globe. The Economist Intelligence Unit (2024) released a Democracy Index which portrays the fluctuations of global democracy as indicated by 167 states and territories between 2006 and 2023, revealing that the pinnacle was 5.55 in 2008, 2014, and 2016, while the lowest level was 5.23 in 2023. Indonesia, as one of the countries observed, has suffered a gradual decline within the last nine years. This result could be caused by many factors (EIU, 2024). Fair government, including law supremacy, civil liberty, press freedom, and political transparency and accountability within the society, is essential to democracy (Umam, 2024). Political participation, which means giving opportunity for interest groups, whether businesses or nonprofit organizations, to engage in the political process also contributes to the democratic level.

Among the various modes of political participation within a democratic setting, lobbying is a notable form. Lobbying is defined broadly as an effort aimed at shaping the policy-making process (Baumgartner & Leech, 1998) or the action of individuals or groups, each with distinct and particular interests, aimed at influencing decisions made at the political level (Chari et al., 2019). This multifaceted process involves endeavors by individuals or interest groups to impact the formulation of political decisions by advocating for specific issues or influencing the formulation of legislation. Researchers have sought to derive conclusions on the impact of direct lobbying or campaign contributions on the voting patterns of congressional members (Baumgartner & Leech, 1998). Amongst the dynamics facet of civil participation, lobbying holds a key position in influenc-

ing the direction of policy development, reflecting the diversity of interests and perspectives inherent in the political landscape.

Lobbying Activity as Political Culture

The political culture of influencing decision-making through lobbying has been a longstanding tradition in history. A couple of jurisdictions are mentioned to have formalized this culture, such as the US (after the end of the Civil War), Canada, and Germany (Chari et al., 2019). Lobbying regulation in the US dates back to 1876 when the House of Representatives passed a resolution requiring lobbyists to register with the House Clerk. This early measure remained in place until the Federal Regulation of Lobbying Act of 1946, which introduced a formal system for both lobbyist registration and disclosure (Ki Hong, 2023). Since then, multiple countries started adopting lobbying regulations. At least 29 jurisdictions have regulated this practice as of 2023.

Then comes an inquiry: how important is the existence of lobbyists in terms of their function in the political system? Lobbying is frequently perceived by the public as a corrupt practice that negatively influences policy-making through undue influence and secret deals. However, when practiced correctly, lobbying can serve as a vital tool for democracy, facilitating the communication of viewpoints and issues to policymakers, ultimately making the policy formulation better aligned with public needs and more effective (Alemanno, 2023). Lobbyists may either play a role in information transfer since they convey signals regarding policy issues to politicians, or a role in shaping the direction of legislative decisions by using their network as currency (Ban, Palmer, & Schmeer, 2019). They can have a vital role in advocating policy input and outcomes in a democratic policy-making system. Lobbyists, advocates, and all entities who influence the government represent legitimate interests and convey beneficial insight and information on various policy issues (OECD, 2023).

As recent development goes, researchers have identified a new role of the lobbyists in which they offer a type of political safeguard for firms and other groups concerned about potential government policies impacting their interests (Ban, Palmer, & Schmeer, 2019), which signifies the escalation of lobbying activity during the last three decades. However, Chari et al. (2019) highlighted that work conducted by lobbyists often has negative connotations, so the issue of policy-making transparency and accountability should be increased by imposing regulation. Lobbying regulation encompasses the collection of rules, standards, and practical guidelines designed to govern how lobbying activities are conducted within a particular political system (Hogan & Bitonti, 2021).

Lobby and Corruption

One of the problems encountered by lobbying regulation is that the term lobbying is often associated with a tendency towards corruption and integrity issues. It leads to political conflicts of interest when politicians have relationships with companies. In this case, a lobbyist could also become an intermediary for political campaign donations or even bribery (Transparency International, 2019). As an illustration, imagine when an elected politician with a conflict of interest signs a contract to develop a government building with his corporate counterpart. This may lead to unfair marked-up prices or other corruption risks. This condition is worsened in the sense that the level of public awareness is notably limited regarding the extent of lobbyist involvement in the political system, especially in developing countries. The public lacks knowledge regarding the details of their proposals, the individuals or entities with whom they interact, and the extent of their influence on the policy-making process.

The second matter is that, in many cases, this phenomenon unmistakably aligns with the realm of influence trading. Trading in influence is included as one of the corruption offenses in the United Nations Convention Against Corruption - UNCAC, specifically in Article 18 concerning the classification of corruption and law enforcement. Here, influence trading is defined as the promise, offer, or gift to a public authority or any other person, indirectly or directly, to abuse their influence to obtain undue advantages (UNODC, 2004).

Methods

This paper utilizes a qualitative approach in descriptive analysis regarding strategic principles and practical evidence in regulating policy. First of all, we conduct a literature review related to the notion of regulating lobbies in the political system. It begins by exploring conceptual ideas derived from International standards and recommendations such as those developed by International institutions.

The study also employs a comparative approach to assess how lobbying regulations are implemented across various countries. In doing so, we explore prior research findings on existing policy and correspond them relatively to the case. Research on regulating lobbies has been a discernible trend in the past few years. Most of them deliver comparative studies related to regulatory regimes in multiple countries (for instance, Chari et al., 2019; Hogan & Bitonti, 2021; Katsaitis, 2024; Laboutková et al., 2020). The inquiries entail the incorporation of theoretical frameworks and models pertaining to lobbying regulations, along with an examination of distinctive jurisdictions. However, few have discussed the implementation in developing countries, especially in South East Asia. We aim to deliver one of the introductions to such a policy that is to be applied in Indonesia. Therefore, the expected output of the study is to provide a practical policy recommendation that might be beneficial strategically and practically.

Results and Discussion

International Standards and Recommendations

In this section, we explore a set of recommendation documents by Transparency International in collaboration with Access Info Europe, Open Knowledge, and Sunlight Foundation (2015); Council of Europe (2017); OECD (2023); as well as Transparency International (2019). We selected these sources due to their applicability to various countries, whether regionally (like the EU) or wider. They have similarities in multiple dimensions: they urge to define lobbying and other related terms, set the principles, and provide a framework design for the implementation.

First of all, in defining the meaning of the terms related to lobbying and its scope, it is obligatory to cautiously analyze the nature of lobbying activities in the region. Transparency International (2019) describes that a good regulatory framework ought to furnish a precise, comprehensive, and unequivocal elucidation of the definitions, e.g., lobbying, lobbyists, and so forth. The use of appropriate terminology is crucial to ensure that the legitimate right to freedom of expression is fully recognized and upheld (Council of Europe, 2017). It has to be robust and adequately explicit to mitigate the risk of misinterpretation or loopholes, yet ensure an equitable environment for interest groups that seek to impact policy-making (OECD, 2023). Furthermore, activities subject to legal regulation such as consultant lobbyists, in-house lobbyists, or entities representing interests should be defined and justified (Council of Europe, 2017). It is also necessary to make exceptions for the subject, e.g., citizens interactions and quasi-public roles (Transparency International et al., 2015).

Table 1. Comparison of the Principles

Recommendation Document	TI, AIE, OK, SF (2015)	Council of Europe (2017)	TI (2019)	OECD (2023)
Principles/Values	<ol style="list-style-type: none"> 1. Transparency 2. Integrity 3. Accountability 4. Impartiality 5. Accessibility 	<ol style="list-style-type: none"> 1. Openness, Transparency 2. Integrity 3. Accountability 4. Honesty 5. Freedom of expression 	<ol style="list-style-type: none"> 1. Transparency 2. Accountability 3. Participation 	<ol style="list-style-type: none"> 1. Transparency 2. Integrity 3. Accountability 4. Fairness

Secondly, the common principles are utilized as core values in the regulation, as well as to derive behavioral rules for the subjects, whether the lobbyists or officials. Even though the terms have some common nature, they might be distinguished in writing. All of them recommend that regulations involve the incorporation of a code of conduct and constraints that lobbyists adhere

to in their pursuits. The common theme is that these behavioral rulings conform with the core values. Those values are compared at least as in Table 1.

The next feature of the recommendations involves the practical framework. A fundamental aspect of lobbying regulation stipulates that lobbyists are obligated to formally register with the state or a typically independent regulatory body prior to initiating communication with elected representatives or high-ranking officials with whom they intend to engage. All of these guidelines emphasize the transparency and integrity of the political process through a robust disclosure in the lobbying register. The register should hold the information as a minimum: details of the lobbyist, subject matters, and the identity of the employer (Council of Europe, 2017). Transparency International (2019) adds the points with a more comprehensive list: ultimate beneficiaries, public officials concerned, type and frequency, expenditure, funding source, and so forth. Aligning with obligatory reporting, they assert public access to the information. Citizens should be able to access it online through a free website as open data. This concept promotes transparency while concurrently minimizing the associated administrative burdens.

In addition, the regulator should prepare a monitoring mechanism for how the regulation is being implemented and what sanctions for noncompliance are to be applied. The lobbying register exists for the function of public scrutiny to prevent undue influences and corruption (Crepaz, 2020). However, an internal supervising mechanism should also be conducted to hold policy-makers accountable for their engagement with influencing interests.

Finally, regulatory frameworks are designed as exemplars to serve as reference for the development of national lobbying standards. However, those guidelines abstained from literally offering model regulations to encourage national policymakers to address the specialties of the local context (Durkee, 2018). The OECD also highlights the significance of clear behavioral standards for lobbyists and officials with regard to revolving-door opportunities and the utilization of confidential information (Durkee, 2018).

Implementation in the United States

Lobbying in the United States can be conducted through various means, such as direct communication with lawmakers, campaign contributions, and grassroots organizing. Lobbying has a long history of practice in the United States and is safeguarded as a form of free speech under the First Amendment. Interest groups can influence the members of Congress in terms of legislative behaviors (Hardin, 2024). However, there are concerns in the US regarding the potential for undue influence on policy decisions, viewing the influence of certain interests as akin to corruption (Dür & Bièvre, 2007; Hardin, 2024). In contrast, lobbying plays a crucial role in the democratic process, enabling citizens to voice their opinions and advocate for their interests. Simply put, lobbying mechanisms in the US might have both positive and negative impacts on decision-making processes; hence, the government enacted the lobbying regulation, emphasizing the quarterly registration and disclosure of lobbying activity. Lobbyists are also obliged to report specific criminal convictions (GAO, 2023). In general, the process is depicted as in Figure 1.

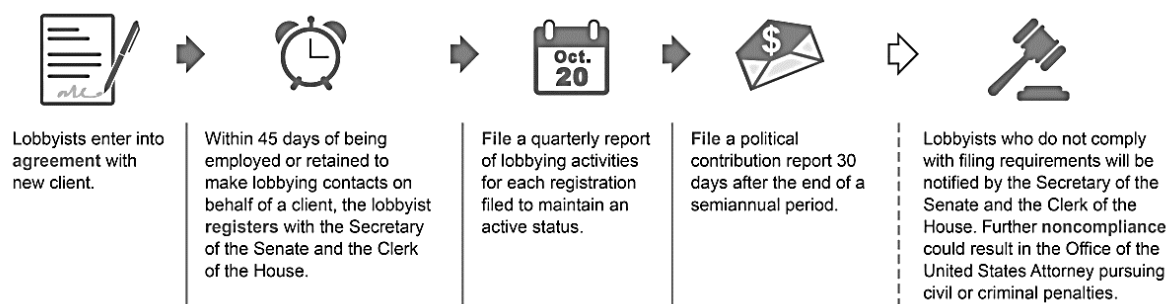


Figure 1. Typical Lobbying Disclosure Process (taken from GAO, 2023)

As reported by the Statista Research Department (2024), the estimated number of registered lobbyists in the US in 2023 was 12,937. On the other hand, opensecret.org (2024) records that total lobbying spending for the same year reached US\$ 4.26 billion. LaPira and Thomas (2014)

noted that for each Congress member, the lobbying industry produced approximately \$12.5 million in 2012. If compared to the average operating expenses for one of the House of Representatives members, which was only \$1.3 million, the industry produces more than nine times that. LaPira & Thomas (2014) found that about 50% of those who were involved in many forms of policy influence did not disclose lobbying activities. This means that for every lobbyist who discloses lobbying activity, there is one so-called "shadow lobbyist" who does not.

While Revolvers (lobbyists who work inside the federal government) are nominally more likely to disclose their lobbying activities, 41% still choose to hide them (LaPira & Thomas, 2014); see Figure 2. In the meanwhile, conventional lobbyists (who are never on the payroll of the federal government) are much more likely to be nontransparent regarding their activities. The findings highlight the complexity and potential lack of transparency in the lobbying industry.

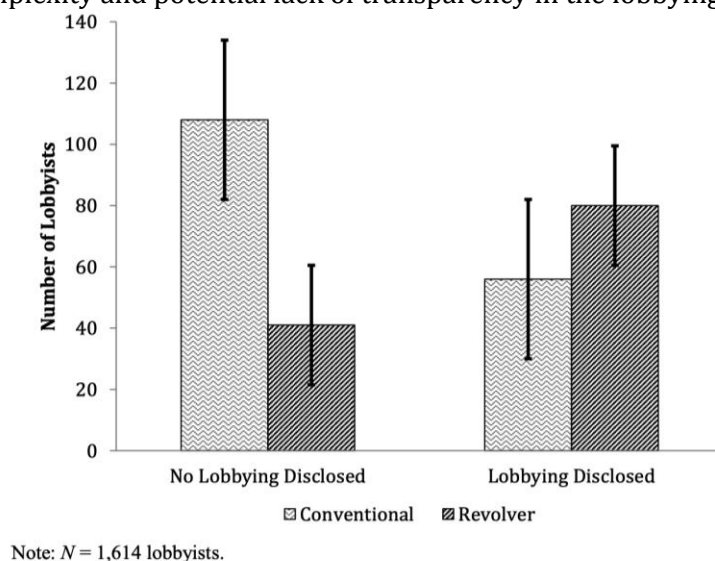


Figure 2. Lobbying disclosure in the US in 2012 (taken from LaPira & Thomas, 2014)

As of March 2023, the Government Accountability Office (GAO) of the United States observes the compliance of disclosure reports mandated by the amended Lobbying Disclosure Act of 1995. They investigated the implementation from mid-2021 until mid-2022, resulting in most lobbyists stating ease in complying with the reporting regulations and understanding the definitions of terms used. The conclusion states that 93 percent of lobbyists report their activity for the quarter in which they first registered; 91 percent of them provide documentation of income and expense; 27 percent of the reports cover previous positions as required; while about 7 percent of political contribution reports are missing reputable contributions (GAO, 2023). These findings broadly conform with GAO's investigations since 2013. Nevertheless, certain disclosure reports manifest instances of noncompliance, such as insufficient reporting of covered positions or misreporting income and expense. The interventions done to resolve the noncompliance are forcing lobbyists to file disclosure reports, conducting a termination of lobbying registration, or imposing civil and criminal penalties (GAO, 2023).

Implementation in Ireland

Irish governments, along with individual politicians and high-ranking civil servants, have operated under a veil of secrecy for so long, keeping their activities concealed from the public eye and oversight (Murphy et al., 2019). The 2011 general election in Ireland marked a pivotal moment in the country's political landscape, leading to significant changes in parliamentary politics and setting the stage for substantial political reform, including the regulation of lobbying (McGrath, 2011). The governing coalition suffered massive losses (Fine Gael & Labour Party, 2011), and smaller parties made significant gains, with Fine Gael as the new largest party coalescing with the Labour Party (McGrath, 2011). The election's aftermath suggested a public backlash against the so-called 'golden circle' and mandated political reform (Fine Gael, 2011). A

key component of this reform¹ agenda was the regulation of lobbying, with plans to establish a lobbying register and introduce stricter rules and standards for lobbyists. This shift towards greater transparency and accountability in politics, particularly in lobbying activities, was seen as a direct reaction to the public demand for change and an effort to address the issues of corruption and undue influence that had plagued Irish politics. Following discussions and interactions with various sectors of society, the regulation was eventually enacted into law in March 2015, known as The Regulation of Lobbying Act 2015.

Keeling et al. (2017) observed that, compared to the United Kingdom, Irish law more thoroughly delineates the concept of lobbying, thereby clarifying the activities of lobbyists. It requires disclosure of the particular issues being targeted by lobbying efforts, the outcomes desired, the precise nature of the lobbying activity, and the identity of the Designated Public Official (DPO) who was targeted by the lobbying efforts. Nevertheless, since the regulation was developed referring to the standards in North America and Canada (Murphy, 2017), it explains why regulations for international lobbyists were excluded, as this applies to both pieces of legislation (Reilly, 2020). There are no rules in place to monitor when a public official is lobbied outside of the country. Lobbyists are not required to inform the Standards in Public Office Commission (SIPO) about such meetings. Rather, international lobbyists are simply advised to voluntarily share this information, with no legal mandate to do so.

In June 2023, Ireland passed the amendment to the Regulation of Lobbying Act 2015. The amendment's objective is to enhance compliance and enforcement, most prominently of the 'cooling-off' provision, and insert of an 'anti-avoidance' clause as well (SIPO, 2023). Still, the regulation does not regulate international lobbying and extraterritorial enforcement, which is considered an oversight in the previous law.

Implementation in Australia

It wasn't until 1983 that paid lobbyists' activities came under a specific legal regulation after having been active in Australia for numerous years (Halpin & Warhurst, 2016). Ng (2020) mentions that the development of lobbying regulation in Australia can be categorized into three stages: the initial stage with the Commonwealth's minimalist regulation between 1983 and 2006, improving executive regulation of third-party lobbyists from 2007 to 2009, and legislative regulation of third party lobbyist from 2009 until 2016. In the initial phase of the Hawke administration, there was a move towards a voluntary and private registry that lacked any form of enforcement. Subsequently, the Howard administration eliminated the need for lobbyist registration entirely for its ineffectivity (Halpin & Warhurst, 2016), but a Ministerial Code of Conduct was introduced in which Ministers must avoid conflicts of interest in their interactions with lobbyists. The lack of enforcement mechanisms essentially relegated the responsibility of self-regulation to the lobbyists and government officials on an individual basis. The second phase emerged, wherein the executive model of regulation first implemented in Western Australia was adopted by the Commonwealth and other states, demonstrating a clear case of regulatory practices being transferred across different jurisdictions. Eventually, in the phase of legislative regulation, there was a diversification and breakdown of legislative frameworks across different jurisdictions, with each implementing its unique and stricter regulatory approach. However, the focus of lobbying regulation is predominantly on third-party lobbyists, who represent merely 20% of all lobbyists (Ng, 2020). This situation leaves the significant participants in the system, i.e., 'in-house' staff of companies and major pressure groups, largely unmonitored (Halpin & Warhurst, 2016). The condition exists because of the influence of the lobbying community's effective persuasion over time, which has championed a restrictive approach to regulation primarily aimed at clarifying the interests represented by lobbyists (Ng, 2020).

An Australian election study identifies that 59% of the citizens are satisfied with democracy, and the level of trust is at its lowest, with only 25% believing that government officials are

¹ Proposed reform incorporates constitutional changes, a review of parliamentary procedures, electoral system reforms, a referendum on abolishing the Senate, reductions in the number of parliament members, and restrictions on politicians' pay and benefits.

trustworthy (Cameron & McAllister, 2019). In response to the waning confidence in democracy and political institutions in Australia, a reform in the regulatory framework governing lobbying in Australia is required to broaden its reach. Enhancing the transparency of lobbying efforts will illuminate a sector presently obscured, mitigate the potential for corruption among lobbyists and public officials, and uphold the democratic principles of political equality and fairness (Ng, 2020).

Lobbying firms conducting their activities are required to register with the authority. The list of lobbyists working for these firms, along with the clients assigned to them, is published on a website and updated regularly. The public can observe which client utilizes the services of a lobbyist (in other words, who the actual beneficial owner is), as well as the timing of such activities. Additionally, the public can monitor the issues that are being “championed” by the lobbyists to attract the attention of decision-makers. This information is available through the following web display²:

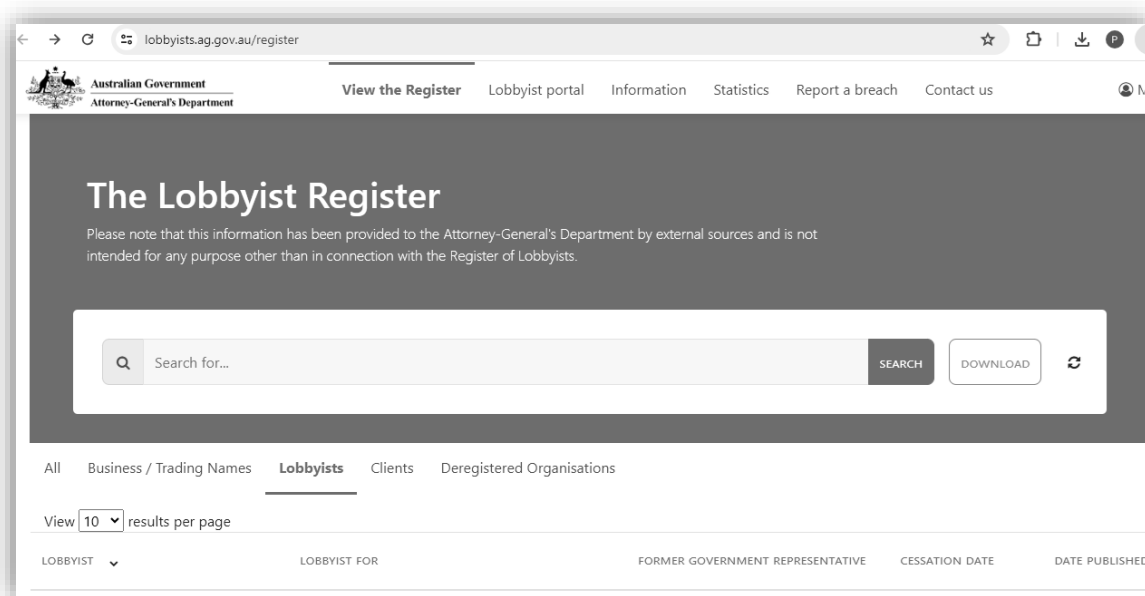


Figure 3. Australian Lobbyist Register (taken from <https://lobbyists.ag.gov.au/register>)

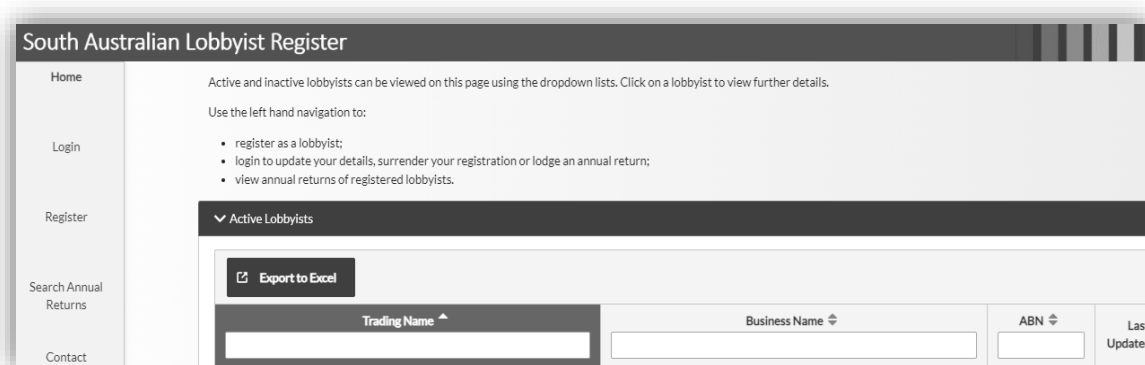


Figure 4. South Australian Lobbyist Register (taken from <https://www.lobbyists.sa.gov.au/>)

² For the sake of this study’s objective, we do not present the issues currently listed in the aforementioned registry. For more in-depth observation, readers may access the website directly.

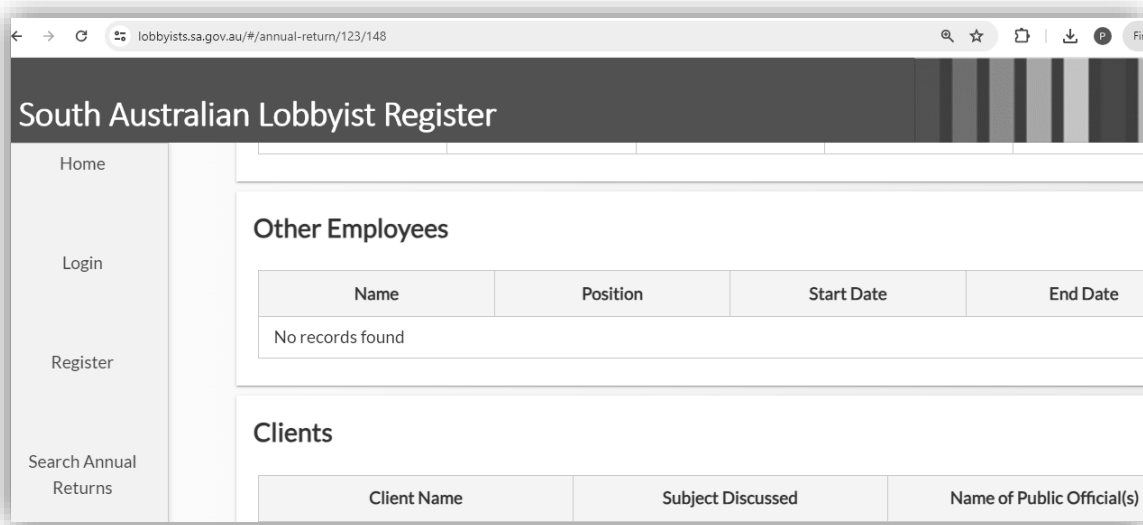


Figure 5. South Australian Lobbyist Register - detail of client and activity (taken from <https://www.lobbyists.sa.gov.au/>)

Lobbying Activity: Indonesia Perspective

Lobbying activities have been a persistent feature within the Indonesian landscape. Individuals having personal relations with the policymaker might influence decision-making. Unlike other developing countries that have enacted lobbying regulations, such as Lithuania and Chile, Indonesia still has little to no regulation governing lobbying activities. Whilst more and more complex lobbying practices are taking place over time, the attempt to regulate such phenomenon has not reached the attention of the legislation.

There has been a dimension in the political process in Indonesia that employs the principle of transparency, such as the information on legislation programs. The information on legislation agendas, consisting of their title, progress, and the initiator of the program, is readily available on the House of Representatives webpage, as provided here:

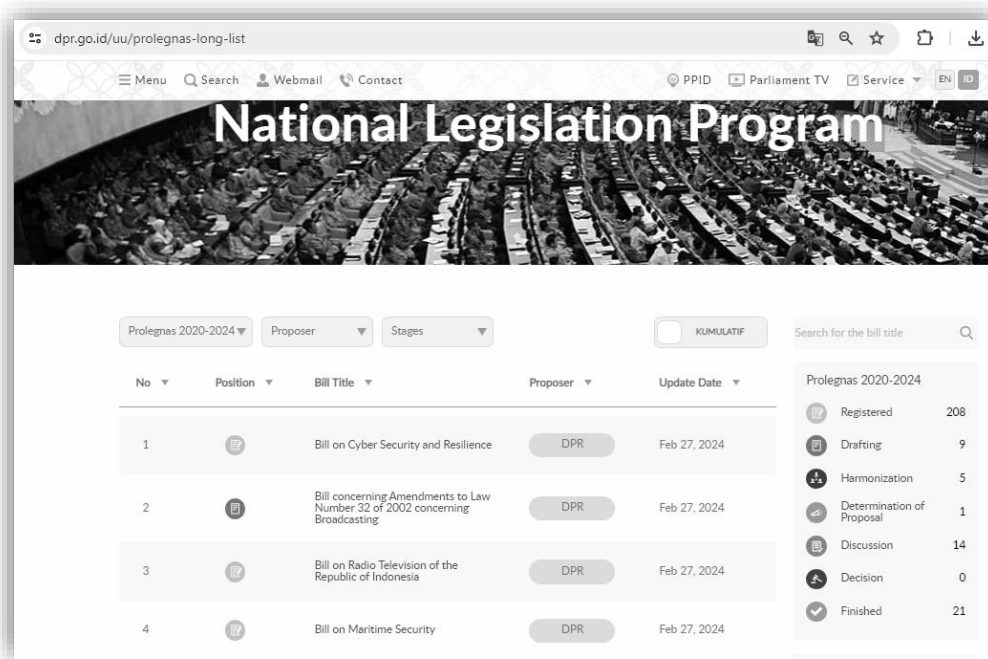


Figure 6. The web view of the Legislation Agenda (taken from <https://www.dpr.go.id/uu/prolegnas-long-list>) (House of Representatives of Indonesia, 2024).

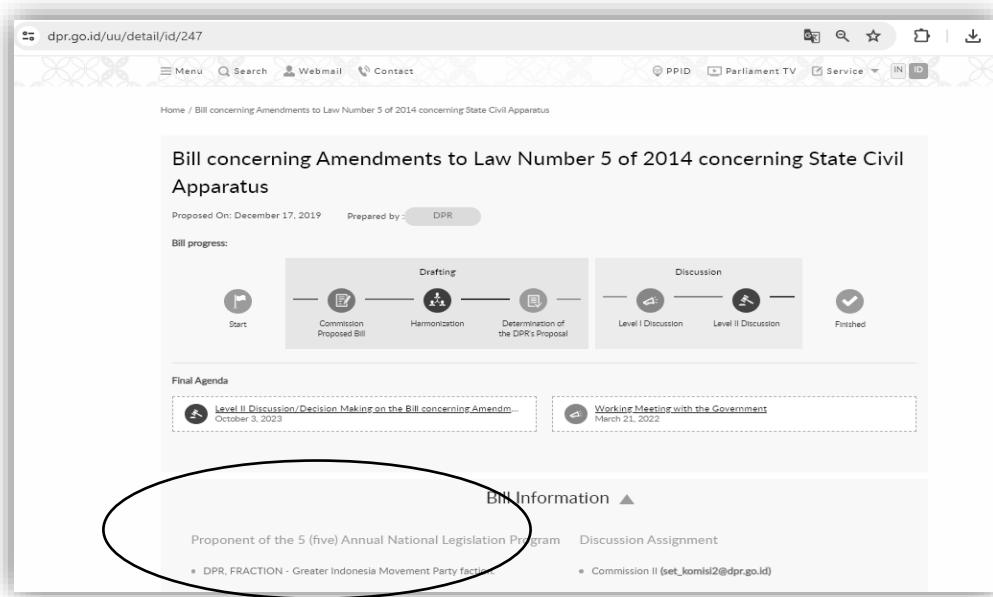


Figure 7. The web view of the details of Legislation Agenda 1 (taken from <https://www.dpr.go.id/uu/prolegnas-long-list>)

The information incorporates the proponent of the bill as shown in Figure 7 as well as the discussion assignment. In addition, there is a feedback form meant to be filled out by the public, who might have suggestions on the issue. However, instead of utilizing it to give substantial feedback, citizens would rather employ a cliché question or statement multiple times, as Figure 8.

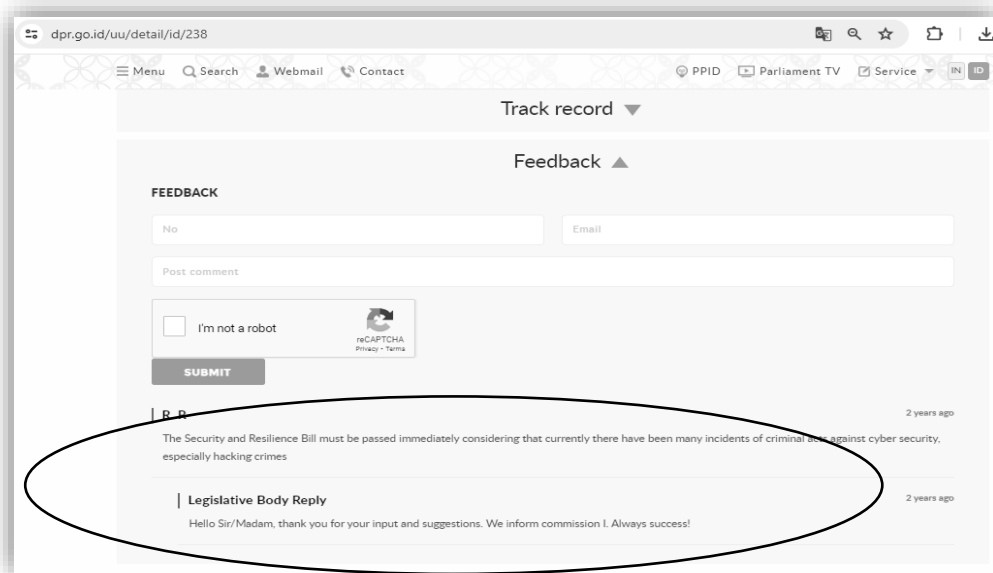


Figure 8. The web view of the feedback form (taken from <https://www.dpr.go.id/uu/prolegnas-long-list>)

Unfortunately, some of the programs mentioned do not adequately provide profound details, as depicted in Figure 9.

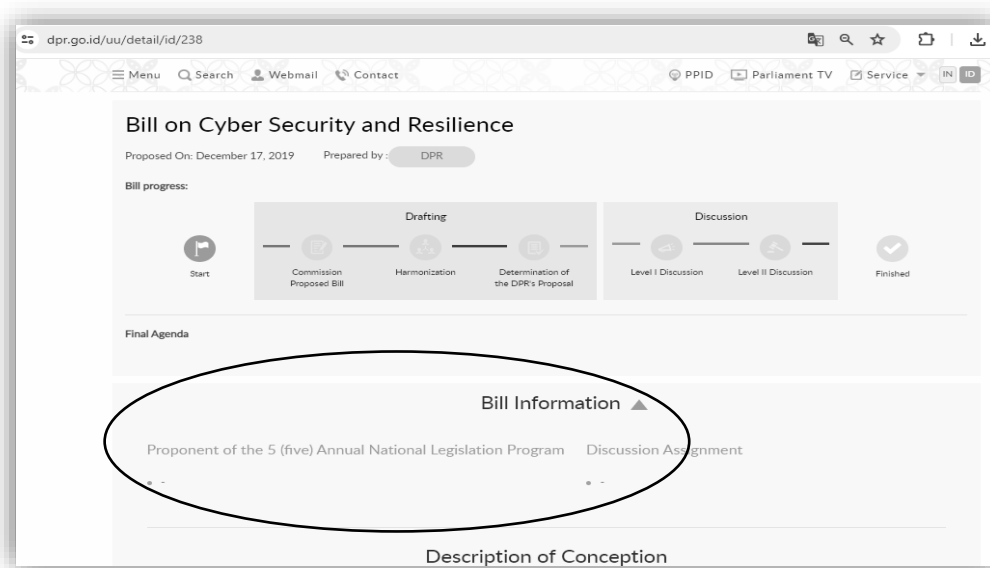


Figure 9. The web view of the details of Legislation Agenda 2 (taken from <https://www.dpr.go.id/uu/prolegnas-long-list>)

Furthermore, the issue lies in the ambiguity surrounding the actual initiator – the individual or group that significantly influences the policy. The public should make an extra effort to recognize the true proponent of the policy due to the lack of information. The method could be by referring to academic research on some policy issues, for example, climate change policy (Isnaini, 2021; Jotzo, 2018; Ardhan, Adiwibowo, & Wahyuni, 2016). Another way of recognizing the promoter of the policy is through the information released by mainstream media specialized in politics, for instance, Tempo, Detik, Gatra, or Parleментарia Magazine. The latter magazine, published by the House of Representatives, tends to exhibit information limited to the perspective of legislators.

Imposing Lobbying Regulation in Indonesia

As Indonesia made a significant step toward joining OECD membership in early 2024 (ANTARA, 2024), better governance should be put in place. Rulings on the political system are not an exception. The abovementioned recommendations on regulating lobbying enhance the government's prioritization of public interests as well as strengthen transparency in the decision-making processes. Various key actors, i.e., public servants, lobbyist representatives, civil societies, and independent 'watchdogs' ought to actively engage in the formulation of regulation to establish a shared understanding of expected standards (OECD, 2023).

The inquiry is: what should the scope of the regulation be? First things first, the policy implementer must be a high-level institution in the government that acts independently. As Indonesia does not possess a certain body for this function, the role might be taken by the Corruption Eradication Commission (the CEC) while developing a more specific one. The reason is that The CEC already has a function called prevention and monitoring activities associated with corruption (CEC, 2020). However, the implementation cannot rely on refocusing the existing body. A new institution must take the role of an authority for not only supervising compliance but for administering punishment as well. Moreover, since Indonesia has a broad archipelago and hundreds of municipalities, the new institution should cover all the geographical areas.

Secondly, all politicians and public officials who conduct lobbying activities are obliged to register. We propose that the activity be considered illegal gratification when they fail to do so since it involves a transfer of resources with consequences in the public sphere. Once it falls under the category of illegal gratification, and therefore as a form of corruption, it can be further investigated and acted upon by law enforcement agencies.

In line with the reporting trajectory, the regulation also asserts public access to the lobbying information. The register is made online through a website as open data accessible by all citizens across the country.

Lastly, our proposition on how the regulation be organized in terms of its structure is as follows:

The initial part of the law encompasses the principles and clear definitions of the terms used.

It begins by explaining the urgency and the purpose of the law, i.e., underpinning transparency within the democratic system, fostering integrity, reducing the risks of corruption, and the like. It is followed by mentioning the principles as the foundation and guidelines for the policy. An explicit definition is also required in this section to drive precision in the implementation and to control the expected result. Otherwise, the policy would meet some impediments in its implementation. For instance, lobbying law in the UK contains a narrow definition of lobbying, which is applicable to only less than four percent of lobbyists (Transparency International, 2019).

We recommend that the principles utilized refer to the OECD's 10 Principles for Transparency and Integrity in Lobbying, which is its position as the first international standard to mitigate transparency and integrity risks associated with lobbying practices. These principles have been implemented since 2010 in OECD member countries that possess a lobby ruling system. Implementing these principles would not only strengthen the existing legal foundation but also ensure that lobbying activities are conducted in an open and responsible manner, reducing the risk of corruption and supporting a more transparent and integrity-based democratic system. Both Adherents and certain non-adherents have made progress in promoting transparency, integrity, and access, though at varying paces within the ever-changing lobbying environment (OECD, 2021).

The core part of the regulation should incorporate the broad framework design.

The development of a comprehensive framework is firstly aimed at designing the ethical guidelines for lobbyists with careful consideration. It is to delineate clear standards and accountability measures aimed at fostering transparency, integrity, and responsible engagement within the lobbying profession. It should encompass mechanisms for addressing conflicts of interest, ensuring disclosure of information, and promoting adherence to legal and ethical norms. Additionally, the framework should facilitate ongoing evaluation and revision, which is open to adaptation associated with evolving societal values, regulatory requirements, and professional best practices.

This section also describes the ruling on the lobby register and its details. It includes what should be informed, when the lobbyists file the report, how much the related costs are, etc. Whereas the categories of registers are categorized, the types of registration can be classified into voluntary, mandatory, and conditional (Hogan & Bitonti, 2021). The content of the register could refer to the aforementioned standards by international institutions. The lobbying register not only serves its goal of public examination but also produces advantages for lobbyists themselves, e.g., promoting their business, formulating strategy, gaining information, fostering competition, and collaboration (Crepaz, 2020).

Efforts to mitigate challenges like those encountered by Ireland and Australia need to be taken into consideration. The failure to adequately regulate international lobbying and extraterritorial enforcement highlights a significant urgency of attention. It needs to focus more on not only third-party lobbyists but also other types of lobbyists.

The last element of it will be the monitoring and enforcement mechanism.

Lobbying regulation should include ongoing scrutiny and the implementation of enforcement mechanisms aimed at improving disclosure and compliance, like the experience derived from the US case. These interventions seek to bolster accountability within lobbying practices. The authority must go hand in hand with public participation in the monitoring process, whether it is frequent or in real-time scrutinizing in the sense that the information is available online. Besides, there has to be a punishment for noncompliance. The sanction for the lobbyist for noncompliance enhances the level of efficacy in achieving the policy objective. Sanctions for breach of reporting

or ethical mandates could either be fine (like applies in Austria, Canada, France, Germany, etc.), suspension from registering and consequently from lobbying (like in Australia, European Union, Lithuania, and Serbia), report to the parliament (like in Scotland), or the combination between them (HATVP, 2023).

The Challenge in Indonesia's Landscape

A shift towards greater transparency in politics and bureaucracy, specifically in such a complex political setting as Indonesia, could be viewed as a "headshot" for existing actors. Some negative responses or counter-attacks may arise from certain political or economic interests. A scaled confrontation in the parliament during the legislation process is an example. For this type of opposition, the government needs to collaborate with multiple parties to ensure the positive impacts of the policy and pass the legislation.

Furthermore, the response could also be in the form of resistance from those who play dirty in political engagement, for instance, by not complying with disclosing their lobby activities. As for this group of actors, the authority must set unequivocal deterrent sanctions. By imposing such punitive action, it is expected to serve as a lesson for others.

Conclusion

Lobbying offers representation to marginalized groups, ensuring that their interests and needs are considered in the decision-making process. This engagement serves as an enhancement of democracy (EIU, 2024; Umam, 2024). Therefore, tools are required to prevent corruption and enhance political integrity, i.e., appropriate regulation, accountable principles, and adequate law enforcement authority. This study assesses international frameworks and guidelines for regulating lobby activities, along with an examination of their application in distinctive jurisdictions. Lobbying should be made transparent for multiple goals: reducing the space for corruption of public officials, maintaining public trust in the political system, and maintaining equality and fairness on the playing field (Laboutková et al., 2020). However, the provided recommendations are relatively new tools for most countries while addressing the inherent complexities of such interactions, considering that the form of lobbying always changes over time. Hence, the effectiveness of these recommendations should be kept under review (Council of Europe, 2017).

In light of the findings, many of the implementations suggest both merits and demerits and all of them still need further exploration and assessment. The efficacy of lobbying regulation in the United States is facing persistent challenges, such as insufficient disclosure and potential noncompliance, which underscore the need for continued regulatory scrutiny and enforcement mechanisms. Meanwhile, the introduction of Ireland's Regulation of Lobbying Act 2015 failed to address international lobbying and extraterritorial enforcement adequately, a notable deficiency that needs to be addressed and solved. In Australia, however, there has been a progression from minimalistic approaches to more stringent legislative frameworks, albeit predominantly focused on third-party lobbyists. However, a shortcoming persists relating to the lack of monitoring of 'in-house' and other forms of lobbyists. This fact highlights the urgent need for thorough reforms to restore declining public confidence in democratic institutions, particularly in the transparency of the lobbying process, as advocated by Ng (2020).

The policy recommendation described in this study is rather simplified because it does not comprehend all the dimensions of lobbying regulation, particularly in Indonesia's setting. More information is also needed regarding the policy applicability assessment. Future research should not be limited to the principles and structures of the policy and, therefore, should investigate more detailed policy advocacy, shapes, and processes. It is still necessary to explore diverse scenarios in terms of policy piloting and implementation, observe anticipated reactions, and evaluate policy impacts. We intend to collaborate further on such projects.

Ultimately, this paper is expected to benefit policymakers in Indonesia and also the lobbyists themselves. The discussion shows that the regulation potentially legalizes and enhances their profession. Given that the government enacting such regulation acknowledges lobbying as a legitimate and indispensable component of the democratic system, it may prove advantageous for

them to structure lobbyist registries in a manner conducive to maximizing civil participation (Crepaz, 2020). Finally, the regulation framework may serve as a significant instrument in upholding the integrity of democratic decision-making processes and safeguarding public trust in governmental institutions.

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