



29 January 2021

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

Dear Committee Members,

The Association of Australian Medical Research Institutes (AAMRI) is pleased to put forward this submission to the *Review of the Electoral Legislation Amendment (Electoral Funding and Disclosure Reform) Act 2018*. AAMRI is the peak body for not-for-profit medical research institutes (MRIs). Our members are medical research institutes (MRIs) and undertake world-class medical research to help improve the lives of millions of people throughout Australia and around the world. MRIs have been at the forefront of Australia's response to the COVID-19 pandemic, developing public health advice, epidemiological modelling, new diagnostic tools, treatments, and vaccines.

AAMRI's primary concerns with the proposed changes to the Act in 2018 had centred on whether some routine activities of MRIs could inadvertently be branded as 'political campaigning' because of the loose definitions that had been proposed, along with the previously proposed low expenditure threshold. Had these changes been enacted it could have seen MRIs being forced to register as political campaigners. This would have had a negative impact on the image and reputation of MRIs, potentially threatening philanthropic efforts which are vital to Australia's medical research.

Examples of routine activities conducted by MRIs include providing public information about the dangers of smoking, publicising the health benefits of immunisation, and promoting healthy eating to reduce the impact of obesity. More recently, activities such as countering misinformation with respect to the COVID-19 pandemic could also have been captured by some of the proposed amendments in 2018. Given its potential impact on philanthropy the risk of being labelled a political actor is so troublesome for MRIs that many might be less willing to participate in public health information campaigns for fear of being branded a political campaigner.

The legislation that Parliament passed included improved definitions relating to what counts as electoral matter and had a higher organisational expenditure threshold. This has meant that the amendments that were made to the Act in 2018 have had a negative impact on MRIs to date. This has allowed MRIs to continue their important public health work which has been particularly vital during the COVID-19 pandemic.

AAMRI would recommend that great care should be taken when making any new changes to the Act. In particular, AAMRI would urge caution when considering changes to either the definition of electoral matter, or changes to the expenditure thresholds used within the Act. Changes to either of these areas have the potential to cause disruption the important work public health work undertaken by MRIs.

Thank you for the opportunity to provide this submission.

Yours sincerely,



Dr Peter Thomas
AAMRI Executive Director

