Submission No 3

ANNUAL AMOUNT DISTRIBUTED TO MINOR PARTIES FROM THE ADMINISTRATION FUND

Organisation: Shooters, Fishers and Farmers Party

Date Received: 19 October 2025

Shooters Fishers and Farmers Party (NSW)

Submission to the Inquiry into Minor Party Administrative Funding

Committee: Joint Standing Committee on Electoral Matters
Act: Electoral Funding Act 2018 (NSW)
Issue: Annual amount to be distributed from the Administration Fund to eligible minor parties
Prepared by: Shooters Fishers and Farmers Party (NSW)
Date: 19th October 2025

Executive Summary

The Shooters Fishers and Farmers Party (SFF) welcomes the opportunity to submit to the Joint Standing Committee on Electoral Matters regarding administrative funding available to minor parties under the *Electoral Funding Act 2018 (NSW)*.

In the Party's opinion, the current framework does not reflect the true cost of maintaining compliance and representation for cross bench minor parties operating for statewide representation. Upper House minor parties carry **identical statutory and audit obligations** to major parties yet are resourced at a level closer to a single Lower House electorate office — despite servicing the entire State of New South Wales.

SFF operates as a fully compliant registered party with **three full-time staff**, **one part-time officer**, **one near full-time volunteer,** who carry statutory compliance responsibilities. In comparison, regional Lower House Members such as those for **Barwon**, **Murray**, and **Orange** are each provided as high as **ten staff**, multiple **fully funded electorate offices**, and **travel allowances** up to and **exceeding $100,000**, all funded by the Parliament. These Members carry no party compliance or governance duties. SFF, by contrast, must meet those same obligations while funding its own office, staff, and audit functions from a capped administrative allocation.

The Party submits that the funding model should be guided by principles of **equity and proportionality** — ensuring that equal statutory obligations attract equitable and equal resources. Also the Act does not define a minor party, something we believe should be rectified. A clear, functional classification of party scale should apply, we suggest:

- **Minor Party:** 1–5 parliamentary members
- **Mid-tier Party:** 6–8 parliamentary members
- **Major Party:** 9 or more parliamentary members

SFF respectfully recommends:

- Recognition of **fixed compliance costs** within the Administration Fund formula.
- Introduction of a **Premises Allowance** for Upper House parties.

- Adoption of **accrual accounting, funding in line with accrual accounting** for staff entitlements and all other deferred liabilities not accounted for on a cash basis.
- Funding to allow alignment of administrative salaries with **Parliamentary Electorate Officer (PEO) Award** standards for the Legislative Assembly.
- Confirmation that **technology and compliance software** qualify as eligible administrative expenses, with an annual allowance for software development and improvement.
- The provision of separate **Legislative Council representational offices** and staffing based on, for example. an analysis of where a party's primary votes support originates in the state, for minor parties.

These reforms would enable SFF as a minor party to remain compliant, transparent, and active in representing regional New South Wales — strengthening, rather than burdening, the democratic process, as a voice to Parliament.

---

1. What Is a Minor Party?

The Party submits that a "minor party" should be defined functionally then in legislation or regulation. A reasonable distinction can be drawn based on total parliamentary representation.

When SFF held **five members** across both Houses of Parliament, it was transitioning toward a *mid-tier* classification. With **two current members**, SFF is properly considered a *minor party*.

For comparison, **The Greens NSW** currently hold **seven seats** in the New South Wales Parliament — **three in the Legislative Assembly and four in the Legislative Council** (*https://www.parliament.nsw.gov.au/members/pages/party-representation.aspx)*. They self-describe as a "movement", do not describe themselves as a minor party and operate with the structures of a major one, including broad policy portfolios and statewide campaigning.

On that basis, SFF proposes a useful **functional classification threshold**:

- **Minor party:** 1–5members across both Houses
- **Mid-tier party:** 6-8 members across both Houses
- **Major party:** 9 or more members across both Houses

This approach ties classification to parliamentary representation and operational need rather than historical perception or political branding.

---

2. Structural Inconsistencies and Equity Gaps

The Party submits that several systemic inconsistencies exist in how administrative funding is distributed between Upper and Lower House representatives:

1. **Upper vs Lower House disparity:** Administrative funding models mirror Lower House electorate structures, yet Upper House parties must operate statewide — covering vastly larger geographies and constituent pools.
2. **Regional footprint cost:** Servicing regional NSW requires extensive travel and vehicle expenses. Lower House seats such as **Barwon** and **Murray** are formally recognised for this challenge through extra offices and staffing. The **2025 Parliamentary Remuneration Tribunal (PRT) Determination** grants Barwon three electorate offices with ten staff and Murray two offices with seven staff. By contrast, cross bench Upper House parties like SFF are limited to only two parliamentary staff by comparison, yet cover the entire state, and no regional office at all.[1] Though strictly not administrative funding in the Lower House staff can carry out similar duties.
3. **Administrative burden mismatch:** Lower House MPs' staff are funded purely for constituency service — they carry some small compliance or governance duties. In contrast, SFF's administrative resources must handle compliance with the Electoral Funding Act, financial audits, membership maintenance, and digital communications. This inequity in role scope versus funding scale is stark.
4. **Technology and systems:** Compliance management, membership maintenance, and outreach increasingly depend on digital systems. Small parties face fixed costs that do not scale down, while major parties can absorb them across large staffing bases.
5. **Payroll on-costs, accruals, and other deferred expenses:** The current cash-basis reimbursement system (based loosely on tax office deductibility rules) prevents parties from properly funding accrued leave and other staff entitlements when leave is taken on and staff move on. This approach creates financial strain and operational instability and ignores our statutory requirement to prepare audited financial statements on an accrual basis. In other words, we have to accrue liabilities but cannot accumulate the equivalent working capital to acquit those liabilities as and when the fall due.

[1] *Source: PRT 2025 Determination, cl. 7.1.2; Schedule 4 Table 1*

3. Comparative Illustrations

Seat	Offices	Staff	Travel Allowance	Key Point
Barwon	3	10	$119,620	Highest-tier regional seat; fully serviced by electorate officers only[2]
Murray	2	7	$119,620	Recognised for distance and regional service burden[2]
Orange	1	3	$57,295	Mid-tier regional electorate; still far better resourced than cross bench parties[3]
SFF (Upper House)	—	2 (funded)	—	Must cover full statewide service for members with minimal staffing and minimal travel allowance

[2] *Source: PRT 2025 Determination, Schedule 4 Table 1 and Schedule 6 (Travel Allowances)*
[3] *Source: PRT 2025 Determination, Schedule 6 Table 1*

In the Party's view, the disparity in pay demonstrated above is structural. Lower House Members such as those in **Barwon**, **Murray**, and **Orange** have all costs of **leasing, fitting out, and maintaining electorate offices** borne by the Parliament of New South Wales under **clauses 7.1.2–7.1.3** of the *2025 PRT Determination* (as confirmed in *PRT 2025 Determination, cl. 7.1.2–7.1.3*). Upper House cross bench parties like SFF must self-fund their offices, rent, and overheads from the capped administrative budget — a significant inequity given their broader scope of representation.

---

4. Operational Deficit and Governance Risk

The Party submits that the current administrative structure of the SFF is insufficient to meet its obligations under the *Electoral Funding Act 2018 (NSW)*. Despite careful financial management, SFF is compelled to operate with minimal staff and substantial volunteer labour while performing the same statutory, compliance, and public engagement duties as larger and better-resourced parties.

Operational limitations include:

- **Insufficient personnel:** Only one full-time administrator and one part-time officer manage compliance, finance, membership, and governance statewide.
- **Volunteer reliance:** The Finance & Compliance Officer role (with direct legal responsibility) and party secretarial duties are performed **90% by volunteer labour**, creating compliance and continuity risks.

- **Technology inequity:** Membership and compliance software costs are **identical across all parties**, but as a proportion of SFF's budget, they are disproportionately high. Further, SFF is unable to develop new software technology aids to allow for more efficient and economic service of its members and constituents. There is no funding for this at all.
- **Leave and turnover impact:** Without provision for accrual-based accounting, staff changes or absences halt operations. Working capital is non-existent.
- **Infrastructure burden:** SFF must **lease, fit out, and maintain** its own administrative office within its capped funding allocation.
- **Automation limits:** While the Party uses digital tools, **AI cannot substitute for accountable human oversight** of compliance and audit functions. This is not risk-averse and not in the public interest.
- **Travel and accommodation:** SFF vehicle do **30-40,000kms** each year. Most recently SFF was **unable to find a lease** for a new party vehicle, so car acquisition costs cannot be spread over funding periods.

Minimum baseline required for compliance and service:

1. **Full-time Finance & Funding Compliance Officer (CPA-qualified)** — statutory reporting, audits, and risk management.
2. **Secretarial and HR Allowance** – on/off boarding, leave management, staff contracts, performance reviews, OHS management, staffing oversight.
3. **Full-time Membership & Engagement Officer** — data integrity, renewals, member communications.
4. **Three full-time Regional Field Organisers** — branch development and member support across regional NSW.
5. **Dedicated technology funding** — secure, centralised compliance/membership systems, development and improvement.
6. **Premises allowance** — to align with institutional support provided to Lower House Members based on Upper House voter support, to give Upper House members constituent offices, one per member.

---

5. Market Salary Comparison and Recruitment Challenges

Because SFF must maintain its administrative and compliance presence in Sydney, comparable wages must be drawn from the Sydney market, which are typically 10–20% higher than regional NSW due to cost-of-living and professional concentration. Only the part-time Membership Officer role is remote.

Role	Sydney Market Benchmark (2025)	SFF as % of Market
Finance & Funding Compliance Officer	$120,000 – $150,000[1]	≈ 9–11%
Membership Officer (Part-Time Remote)	$90,000 – $110,000[2] (FT Sydney equivalent)	≈ 45–50%
Regional Field Organiser	$120,000 – $135,000[3]	≈ 75–80%
Digital & Online Organiser	$120,000 – $145,000[4]	≈ 55–65%
State Director	$160,000 – $190,000[5]	≈ 68–80%

The Party submits that even when benchmarked conservatively, SFF's remuneration remains significantly below market parity. The compliance and finance role operates at less than 10% of market level, while the most senior role remains 20–30% below equivalent positions in public affairs or governance organisations.

This disparity further illustrates the structural gap between the Legislative Assembly staff and the Legislative Council staff Parliamentary funding i.e. bias of paying more for Legislative Assembly staff with no added skill or qualifications.

Footnotes: Sydney benchmark ranges verified against the **Crown Employees (Public Sector – Salaries) 2024 Award** and major industry salary datasets (Indeed, Glassdoor, PayScale, and SalaryExpert, 2024–2025).

---

6. Funding Fairness and Proportionality

In the Party's view, the current administrative funding model is not proportionate to the obligations faced by cross bench Upper House parties and is no longer fit for purpose. The framework was more designed for single-electorate representation rather than statewide operations. It favours Lower House representation when in reality the distinction disappeared decades ago when the government of the day no longer had the "numbers" in its own right in the Upper House. The growing preponderance of independents in the Lower House has been met with a large shower of cash and staff , making the unfairness even more stark.

Upper House parties carry identical statutory obligations to major parties — including compliance, audit, and governance — yet receive markedly less support. This represents a structural inequity.

Funding proportionality should recognise that every registered party must:

- Maintain financial and membership records.
- Submit audited returns.

- Comply with donation caps and deadlines.
- Respond to audit queries with professional accountability.

These are fixed compliance costs, not variable by seat count. A statewide party such as SFF must meet these obligations across a larger geographical constituency with limited staff and volunteers.

Lower House Members in electorates such as **Barwon**, **Murray**, and **Orange** represent fewer than 30,000 primary voters each yet receive multiple funded offices and staff. Those Members have no administrative burden beyond constituency service. This imbalance affects fairness and compliance integrity, not to mention constituent representation.

SFF respectfully submits that proportionality should reflect:

- The scale of compliance obligations.
- The breadth/size of constituency.
- The cost of maintaining lawful operations in Sydney.

In addition, all administrative and staffing allocations should be **indexed for Sydney operating costs**, recognising that compliance and governance work must primarily occur near Parliament House and the NSWEC. Office space, wages, and service costs in Sydney are substantially higher than the state average, yet current allocations make no such adjustment.

In the Party's view, equal statutory obligations should attract equitable resourcing. Recognition of these realities would strengthen transparency and accountability in NSW politics, and especially representation. Further, not indexing for Sydney cost-of-operations should not become a financial disadvantage, as it has become.

---

7. Recommendations and Legislative Clarifications

The Party submits that the *Electoral Funding Act 2018 (NSW)* and other related financing legislation should be amended to ensure that minor parties can meet their uniform compliance, governance and service obligations, on a par with Lower House independents.

Recommendations:

1. Clarify the definition of "minor party" using functional thresholds (1–5 minor; 6–8 mid-tier; 9+ major).
2. Recognise fixed compliance obligations as a base funding component.
3. Introduce a Premises Allowance for Upper House parties.

4. Introduce Funded Regional Offices to better represent constituents' administrative requirements.
5. Recognise accrual-based employment and other costs.
6. Align administrative salaries with professional market standards.
7. Confirm technology and compliance software as eligible administrative expenses and fund accordingly.
8. Establish a triennial review mechanism to reassess fairness and proportionality, whilst maintaining annual CPI adjustments using the Sydney CPI index.

Conclusion

The Party submits that reforming the administrative funding framework would deliver genuine fairness between parliamentary parties, strengthen compliance integrity, and uphold the democratic values of representation and accountability across New South Wales.

Submitted by:

Robert Czeslaw Borsak

State Director

Shooters Fishers and Farmers Party (NSW)
19th October 2025