

February 4, 2008

Lobbyists Registration Regulations
Strategic Policy
Corporate Priorities, Planning and Policy Renewal Sector
Treasury Board of Canada Secretariat
140 O'Connor Street
Ottawa, Ontario
K1A 0R5

Re: *Proposed Lobbyist Registration Regulations*, Canada Gazette Part I, January 5th, 2008

On January 5th, 2008, the federal government released proposed regulations relating to the *Lobbying Act*. The Canadian Chamber of Commerce appreciates the opportunity to offer some comments on these proposed regulations.

The Canadian Chamber of Commerce is Canada's largest and most representative business organization. We are a diverse network of 175,000 organizations, including chambers of commerce, boards of trade, business associations and businesses of all sizes, from all sectors of the economy and all regions of Canada.

Given the Canadian Chamber's role in public policy advocacy, these regulations will apply to our organization and to many of our members. There is potential for the process to be burdensome, with additional technological and administrative requirements being placed on us and on many of our members. This will be a particular concern for the many small business operators in Canada. The Canadian Chamber of Commerce remains committed to working constructively and transparently with our government.

One concern that we have is with respect to the reporting requirements for representatives of foreign governments, such as embassy staff located in Canada. It seems inconsistent that regulations meant to provide transparency regarding lobbying would create a situation where a Canadian company that communicates with a designated public office holder on a particular issue would be required to report the encounter, but a representative of a foreign government, possibly acting on behalf of a company, that speaks to the same government official, on the same issue would not have to report the meeting. We recommend that the federal government examine the consistency of reporting requirements for these lobbying activities.

In the Canadian Chamber's view, the reporting process must be as simple as possible to ensure that Canadians are not overly burdened by the process.

Similarly, we would recommend that, prior to the regulations coming into force, clear instructions be given to Canadians, through an advertisement campaign with detailed instructions on a website. Many people will be unclear as to which communications will need to be reported and they will need to understand the new regulations in order to be prepared to track prescribed communications.

Yours sincerely,

Michael Murphy
Executive Vice-President, Policy