



NATIONAL AIRLINES COUNCIL OF CANADA
CONSEIL NATIONAL DES LIGNES AÉRIENNES DU CANADA

December 19, 2014

Ms. Karen Shepherd
Commissioner of Lobbying
255 Albert Street, 10th Floor
Ottawa, ON K1A 0R5

Dear Ms. Shepherd,

On behalf of the National Airlines Council of Canada (NACC), I want to thank you for the opportunity to provide comments on proposed revisions to the *Lobbyists' Code of Conduct*.

As the trade association representing Canada's largest passenger air carriers – Air Canada, Air Transat, Jazz Aviation LP and WestJet – the NACC promotes safe, sustainable and competitive air travel through the development of policies, regulations and legislation that foster a world-class transportation system.

The NACC and our members take our role in contributing to the development of sound air transportation-related policy very seriously. This is especially important given the fact that our industry is federally regulated. The NACC takes our compliance responsibilities under the *Lobbying Act* and the *Lobbying Code of Conduct* with an equal degree of seriousness.

We have reviewed the background paper outlining revisions to the Code. At the outset, the NACC appreciates a number of the clarifications the proposed changes intend to make. However, in the case of the suggested amendment which would prohibit lobbyists from lobbying “friends” or public office holders who work within a “friend’s” area of responsibility, we believe the proposed changes to be unjustified and unenforceable.

It is important to recall that the intent of the *Lobbying Act* is to ensure the transparency of lobbying activities at the federal level. In the absence of justification provided by Office of the Commissioner of Lobbying outlining the immediate need for such a severe provision, the NACC is of the opinion that the current reporting requirements are sufficient to meet the Act’s transparency objectives.

Not only are the proposed changes silent on how a “friend” would be defined, it is a term that is subjective by nature, cannot be applied with predictability, and will create significant confusion. Expanding limits on legitimate lobbying activities to public office holders who work within a “friend’s” area of responsibility is equally problematic. Again, in its undefined state, the provision cannot be properly interpreted and risks unnecessarily detaching entire government departments from legitimate engagement with industries and organizations who make valuable contributions to the public policy process.

Furthermore, enforcement of the provisions in their current form will be nearly impossible.



The NACC and its members are committed to conducting our advocacy activities both ethically and responsibly. We thank you again for the opportunity to provide our comments on proposed amendments to the Code and for your kind consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Melissa Pasi'.

Melissa Pasi
Manager, Public Affairs and Research
National Airlines Council of Canada