



December 11, 2020

Ms. Nancy Belanger  
Commissioner of Lobbying  
410 Laurier Avenue West, 8th floor  
Ottawa, Ontario K1R 1B7

Via email: [engagement@lobbycanada.gc.ca](mailto:engagement@lobbycanada.gc.ca)

Dear Commissioner Belanger,

On behalf of the Canadian Advocacy Network (CAN), please accept this brief submission regarding your office's consultation on future changes to the Lobbyists' Code of Conduct.

As background, CAN was created to give Canadian charities and not-for-profit organizations the opportunity to access pro-bono external relations (including lobbying) advice and expertise. CAN does not lobby or undertake registerable activities on behalf of organizations. Rather, we serve as a connector to ensure these often-under-resourced groups are matched with interested government relations professionals who are looking to volunteer their time and expertise on a non-paid basis.

Ultimately, many of the groups which CAN volunteers support are small and have access to limited people and financial resources. For these groups, it is particularly important that the rules governing lobbying be straight-forward and easy to navigate. Especially with these groups in mind, the Government of Canada should seek to ensure that these rules strike a balance between furthering transparency and accountability while not placing unnecessarily onerous requirements on those seeking to engage with government on important matters of public policy. These groups in particular should be provided with a regulatory environment that respects and encourages their contributions.

CAN's experience is that while some of the charities and not-for-profits which our volunteers work with are sophisticated in their understanding of the rules governing lobbying, others are not. There is a continued and much appreciated role for you and your office to play in this regard, in terms of awareness-building and providing access to information for these groups.

Thank you in advance for your consideration and for your work on this important consultation.

If you have additional questions, I can be reached by return email, or at 613-314-9287.

Sincerely,

Kate Harrison  
Chair  
Canadian Advocacy Network (CAN)