



CANADIAN FERTILIZER INSTITUTE  
INSTITUT CANADIEN DES ENGRAIS

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January 5, 2015

Karen Shepherd  
Commissioner of Lobbying  
255 Albert Street  
Ottawa, Ontario K1A 0R5

Dear Commissioner,

The Canadian Fertilizer Institute (CFI) supports the concerns raised in a December 5, 2014 letter from the Mining Association of Canada, Railway Association of Canada, Canadian Gas Association, Forest Products Association of Canada and Chemistry Industry Association of Canada regarding proposed changes to the Lobbyists' Code of Conduct. A copy of the letter is attached.

Our particular concern is with your proposal prohibit the lobbying of "friends" The proposed language reads: "*A lobbyist shall not lobby a public office holder who is a relative or friend of the lobbyist or has financial or business dealings with the lobbyist. A lobbyist shall also not lobby other public office holders who work within that public office holder's area of responsibility.*"

Lobbying is a legitimate activity and fundamental to our democracy. Our member companies, individually and through CFI, lobby to ensure that public policy is balanced and reflects an educated understanding of our industry. We appreciate that this activity requires a high level of transparency, and are in compliance with the *Lobbyist Act* and the Lobbyists' Code of Conduct.

CFI has and will continue to operate in a manner that is compliant with applicable laws and regulations. Thank you for providing us with the opportunity to ensure that any changes accurately reflect Canada's policymaking environment.

Sincerely,

Clyde Graham  
Acting President  
Canadian Fertilizer Institute

cc Pierre Gratton, Mining Association of Canada  
Michael Bourque, Railways Association of Canada  
Timothy Egan, Canadian Gas Association  
David Lindsay, Forest Products Association of Canada  
Richard Paton, Chemistry Industry Association of Canada  
Andre Albinati, Government Relations Institute of Canada