

December 12, 2014

Commissioner Karen E. Shepherd
Office of the Commissioner of Lobbying of Canada
255 Albert Street, 10th Floor
Ottawa, Ontario K1A 0R5

Dear Commissioner Shepherd:

RE: Proposed Changes to the Lobbyist Code of Conduct

On behalf of the members of the Canadian Home Builders' Association (CHBA), I support the revisions to the Lobbyists' Code of Conduct as proposed.

It is the policy of the CHBA to ensure that the actions of its staff and volunteers are fully compliant with both the letter and the spirit of the Lobbyists' Code of Conduct and any guidelines set out by the Office of the Commissioner of Lobbying of Canada.

Our one recommendation would be to provide explicit and concrete examples of high-risk and low-risk activities or behaviour in the Code to better illustrate the principles contained therein. For example, according to the Hill Times (October 20, 2014), you clarified that "putting up lawn signs, making a financial contribution to a candidate, or participating on a political panel discussion would create little or no risk, while organizing a political fundraiser, serving on the board of a candidate's electoral district association, or chairing a candidate's electoral campaign would be considered high-risk political activity." This kind of specificity is needed in the Code of Conduct itself.

Thank you for holding this consultation with stakeholders.

Sincerely,

Kevin Lee
Chief Executive Officer