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Ms. Karen Shepherd
Commissioner of Lobbying
255 Albert Street, 10th Floor
Ottawa, Ontario
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December 19, 2014

Dear Ms. Shepherd:

I am writing to provide comments on the proposed revision to the Lobbyists' Code of Conduct. I do so in the context that, as you acknowledge, Lobbying is a legitimate activity. One that contributes to informed public policy that serves the interests of all Canadians.

I fully support the need for transparent and ethical behaviour in the conduct of lobbying activities. Canadians' must have confidence in the integrity of government decision making. I fully respect my obligations under the Lobbyist Act and the Code of Conduct.

Moreover, I agree that all lobbyists have an obligation to avoid creating a conflict of interest for a public office holder by creating a competing private interest. However, I have serious concerns with the proposed revision to Rule 8 pertaining to Improper Influence, whereby a lobbyist would be prohibited from lobbying a 'friend' and persons who work for 'friends'.

'Friend' is a subjective concept, not an objective measure. It has no precise, legal definition. The very concept can differ from individual to individual, and between specific social contexts (e.g. Facebook). Hence, these are unworkable and unenforceable prohibitions, that will only create more confusion and uncertainty about what is legitimate lobbying activity.

I urge you to reconsider this proposed revision to Rule 8.

Sincerely,

Peter Boag
President & CEO