



Office of the Commissioner
of Lobbying of Canada

Commissariat au lobbying
du Canada

ANNUAL REPORT

2024-25



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Preface

This report is submitted to the Parliament of Canada pursuant to section 11 of the *Lobbying Act* R.S.C., 1985, c. 44 (4th Supp.).

Within three months after the end of each fiscal year, the Commissioner must prepare a report about the administration of the *Lobbying Act* during that fiscal year. The Commissioner is required to submit the report to the Speaker of the Senate and the Speaker of the House of Commons. Each Speaker tables the report in the Chamber over which they preside.

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Commissioner's message

After seven years of administering the *Lobbying Act* and the *Lobbyists' Code of Conduct*, I am deeply honoured to have been re-appointed as Commissioner of Lobbying. As I begin my second term, I remain firmly committed to supporting transparency and ethical conduct in federal lobbying.

The 2024-25 fiscal year has again been productive.

We improved transparency in the Registry of Lobbyists. Building on last year's improvements to the information available in the registrations, registrants must now link subject matters to their corresponding details in monthly communication reports.



To clarify the application of the *Lobbying Act*, we published two new interpretation bulletins:

- [Identifying designated public office holders](#)
- [Exclusion from the Act: Submissions to parliamentary committees and to other proceedings of public record](#)

We also developed a primer on the rules of the *Lobbyists' Code of Conduct* related to [gifts and hospitality](#) and how they apply in practice.

With the announcement of an April election, we prepared and published information to support our stakeholders during the election period.

As the *Lobbying Act* has not been amended since its inception in 2008, my team and I continue to identify and explore possible improvements to the Act while we await a formal review by parliamentarians.

As previously indicated, I will issue new interpretation in 2025 with respect to the registration threshold that applies to lobbying done by employees of organizations and corporations, as described at paragraph 7(1)(b) of the *Lobbying Act*. Corresponding interpretation will also be issued in relation to the five-year restriction on lobbying described at subsection 10.11(1).

My expectation is that this new interpretation will result in more transparency and help achieve the Act's objectives. It is my hope that the new interpretation will not be taken as a substitute for updating the *Lobbying Act*.

As always, I am grateful for the professionalism and exceptional contributions of my team. Because of their continued efforts, Canadians benefit from ever-increasing degrees of transparency and ethical behaviour in the lobbying of federal officials.

Nancy Bélanger
Commissioner of Lobbying

Enabling transparency

The federal lobbying regime sets requirements and standards for the transparent and ethical lobbying of public office holders. The Commissioner of Lobbying, with the support of the Office, administers the *Lobbying Act* and the *Lobbyists' Code of Conduct*.

Our primary responsibilities include:

- maintaining and enhancing the Registry of Lobbyists
- expanding awareness and understanding of the lobbying regime and compliance obligations through education
- conducting compliance work that supports respect of federal lobbying requirements

Registry of Lobbyists

The [Registry of Lobbyists](#) is the primary tool for ensuring transparency in lobbying, allowing Canadians to explore and scrutinize the information that lobbyists are required to disclose when they lobby federal officials.

It provides access to a wealth of information and tools including statistics, search alerts and downloadable [data sets](#). Registrations contain a wide range of information about lobbying activities, including:

- client/employer information (including parent and subsidiary companies)
- names of lobbyists and previous federal public offices held, if any
- federal institutions lobbied
- details about the lobbying itself — including their subject matter and descriptions of the matters lobbied about
- lobbying techniques used (i.e. verbal, written, grassroots campaigns), and
- domestic and foreign government funding, if any.

Consultant lobbyists must file a separate registration for each client. For in-house lobbyists (corporations and organizations), the most senior officer that is paid must file a registration if the corporation or organization meets the [significant part of duty threshold](#).

Corporations must list all senior officers who lobby and all employees whose lobbying activities constitute a significant part of their duties, while organizations must list every employee who lobbies.

Who engaged in lobbying in 2024-25



- **799** filed in-house registrations
- **631** filed in-house registrations and paid at least one consultant to lobby on their behalf
- **2,272** paid at least one consultant to lobby on their behalf



- **1,670** consultant lobbyists
- **7,214** in-house lobbyists
 - **2,924** employed by corporations
 - **4,290** employed by organizations

Who was lobbied through an oral communication arranged in advance

Designated public office holder	Total communication reports
Members of Parliament	11,417
Deputy ministers, associate deputy ministers and assistant deputy ministers	6,291
Chiefs of Staff	2,342
Ministers	1,774
Officials in the Prime Minister's Office (including the prime minister)	1,636
Senators	1,538
Prime Minister only	78

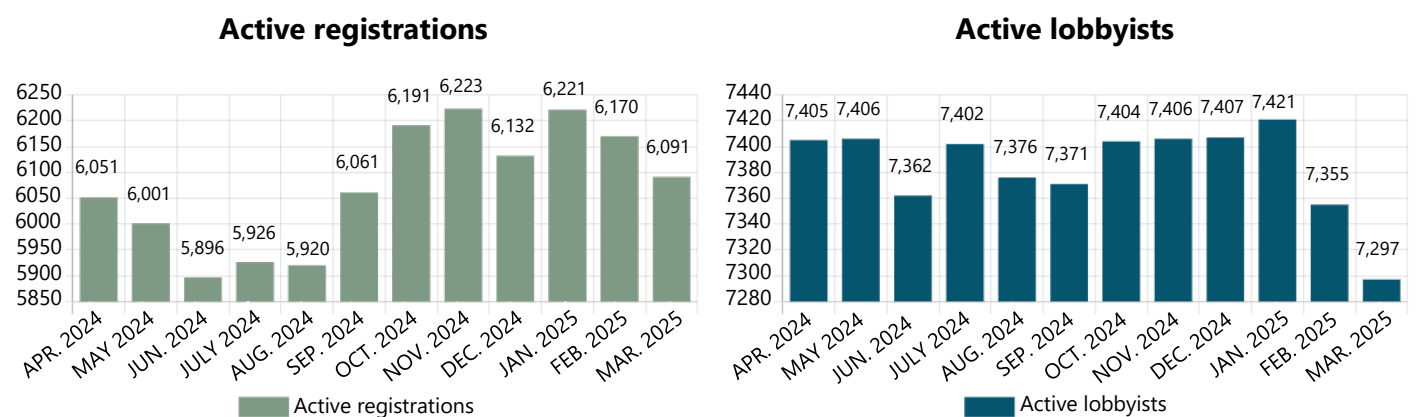
Active registrations and active lobbyists

The upward trend in the number of active registrations and active lobbyists continued in 2024-25.

Each month, new records were set for the number of active registrations for that month, with an all-time record established in November 2024 with 6,223 active registrations. Throughout the year, the number of active registrations consistently stayed above 6,000, except for a slight dip from June to August 2024.

A similar trend was observed for active lobbyists, with new monthly records established each month, with the exception of March 2025. A new all-time record was recorded in January 2025, with 7,421 active lobbyists.

The figures below represent the number of registrations and lobbyists registered in each month.



Government institutions in registrations and communication reports

Top-5 government institutions in registrations

- 1 | House of Commons
- 2 | Prime Minister's Office
- 3 | Finance Canada
- 4 | Innovation, Science, and Economic Development Canada
- 5 | Senate of Canada

Top-5 government institutions in communication reports

- 1 | House of Commons
- 2 | Innovation, Science, and Economic Development Canada
- 3 | Finance Canada
- 4 | Global Affairs Canada
- 5 | Environment and Climate Change Canada

Subject matters in registrations and communication reports

Top-5 subject matters in registrations

- 1 | Economic development
- 2 | Industry
- 3 | Environment
- 4 | Taxation and Finance
- 5 | Budget

Top-5 subject matters in communication reports

- 1 | Economic development
- 2 | Environment
- 3 | Industry
- 4 | International trade
- 5 | Taxation and finance

Communication reports

A total of 31,058 communications that were oral and arranged in advance occurred during the fiscal year, approximately 3,000 fewer than in the previous year.

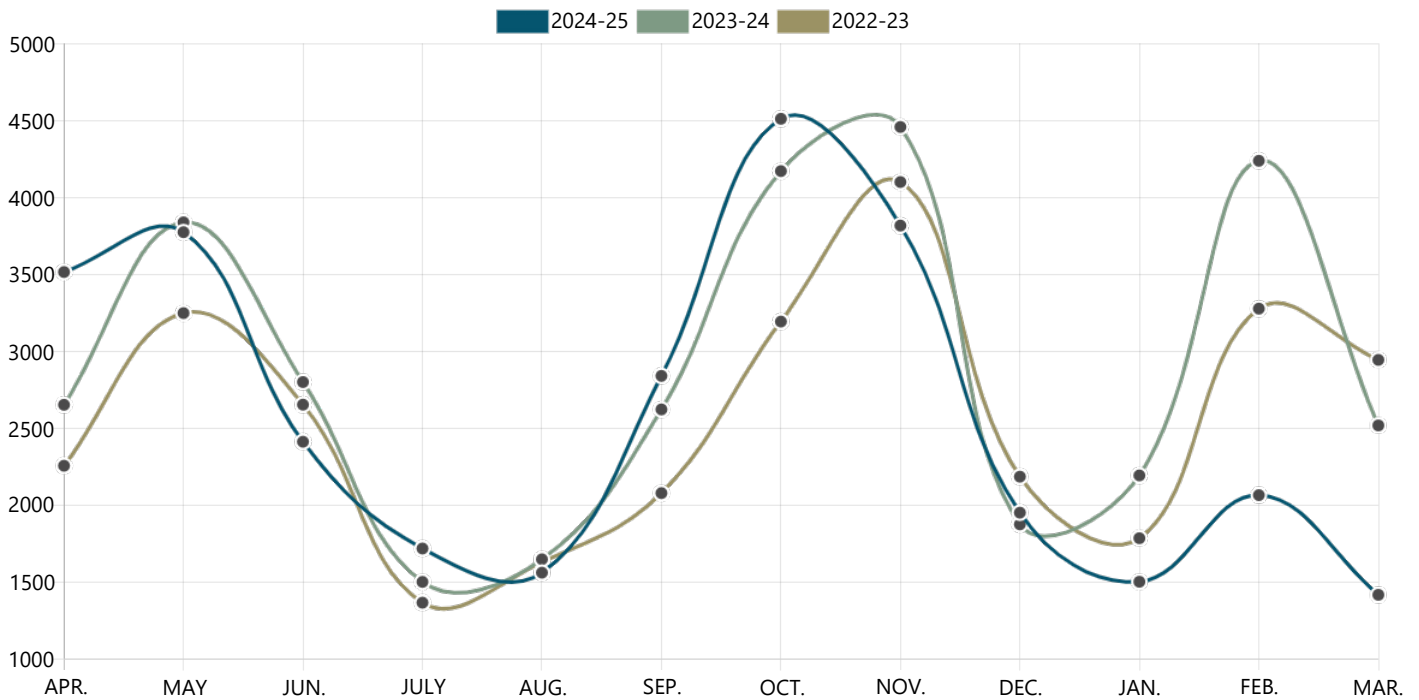
While 2024-25 was not a record-setting year for the total number of communication reports, it was the second highest in the history of the Office. Fiscal year 2023-24 saw the highest number of communication reports with 34,490.

A drop in communication reports observed from January to March 2025 is likely attributable to the prorogation of Parliament in early January and the election call in March. This decline aligns with trends observed in previous election years, as the dissolution of Parliament leads to members of Parliament no longer being designated public office holders. Additionally, the implementation of the caretaker convention may have contributed to a reduction in the number of meetings with lobbyists.

The months of April, September and October 2024 set records for the number of communication reports for those months. In fact, October also set a new all-time record with 4,509 reports, beating the previous record of 4,435 established in November 2024 by more than 500 reports.

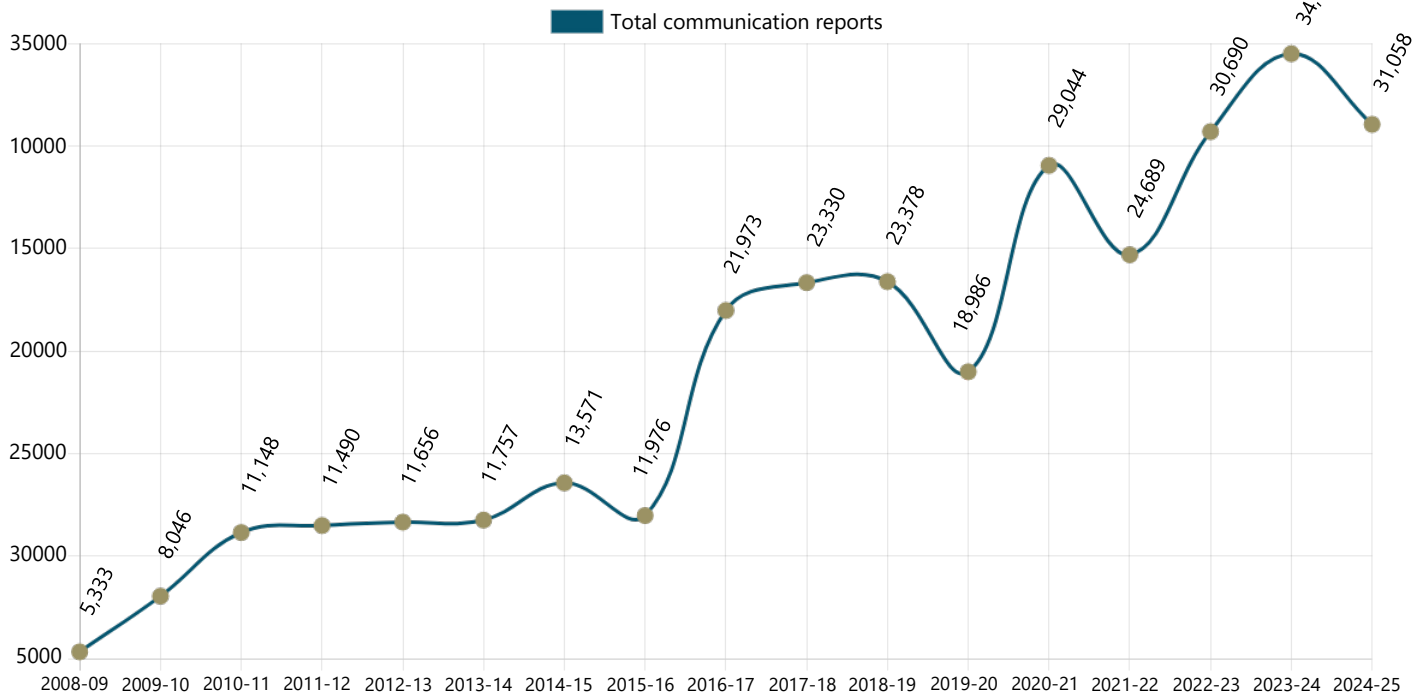
31,058
Total communication reports filed

Communication reports – Month over month



These are the number of communications that took place between April 1 and March 31, and were filed in the Registry by May 1 of the given year. This ensures a more accurate reflection of communications that occurred during the fiscal year since it includes the March communications that must be submitted by the 15th day of April.

Communication Reports – Year over year*



*Slight difference over previous reported yearly totals may occur due to late communication reports or deletions following verifications.

Timeliness of registrations and communication reports

Under the *Lobbying Act*, it is an offence to fail to register within the timelines prescribed or to file communication reports later than 15 days after the end of the month in which the communication occurred.

The Office accepts late filings to increase transparency in the Registry of Lobbyists and an investigation is conducted only where it would be necessary to ensure future compliance.

Commissioner Bélanger continues to advocate for amendments to the *Lobbying Act* that would introduce a [broader range of sanctions](#). This would provide greater flexibility in applying remedies that are both appropriate and proportionate to the nature of the incident of non-compliance, such as instances of late filings, ensuring a more effective and responsive enforcement framework.

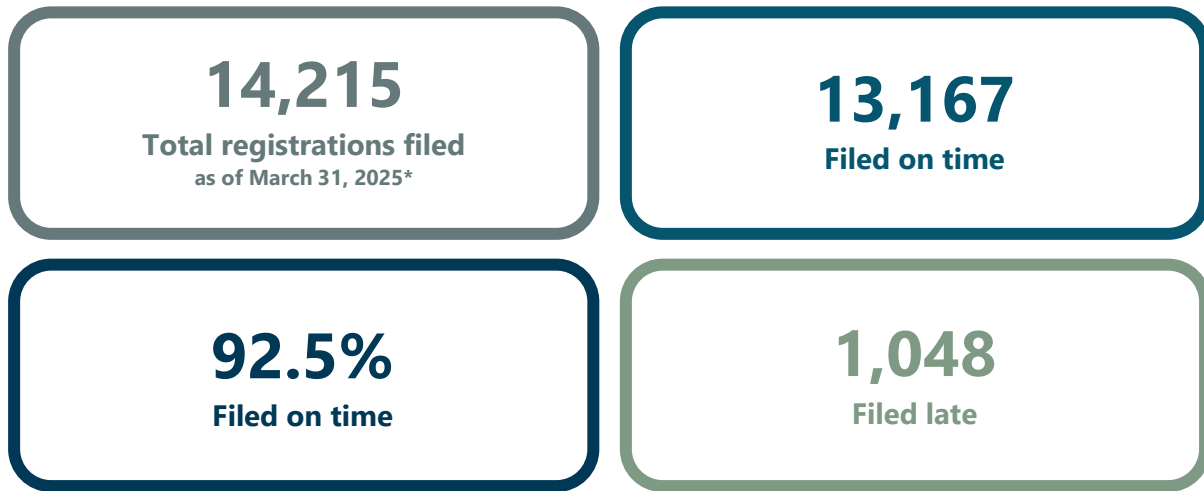
Late registrations

In 2024-25, 92.5% of registrations were filed on time, reflecting a strong overall compliance rate. A total of 1,048 of registrations were filed late, a number which includes new registrations, reactivations, and updates to existing registrations.

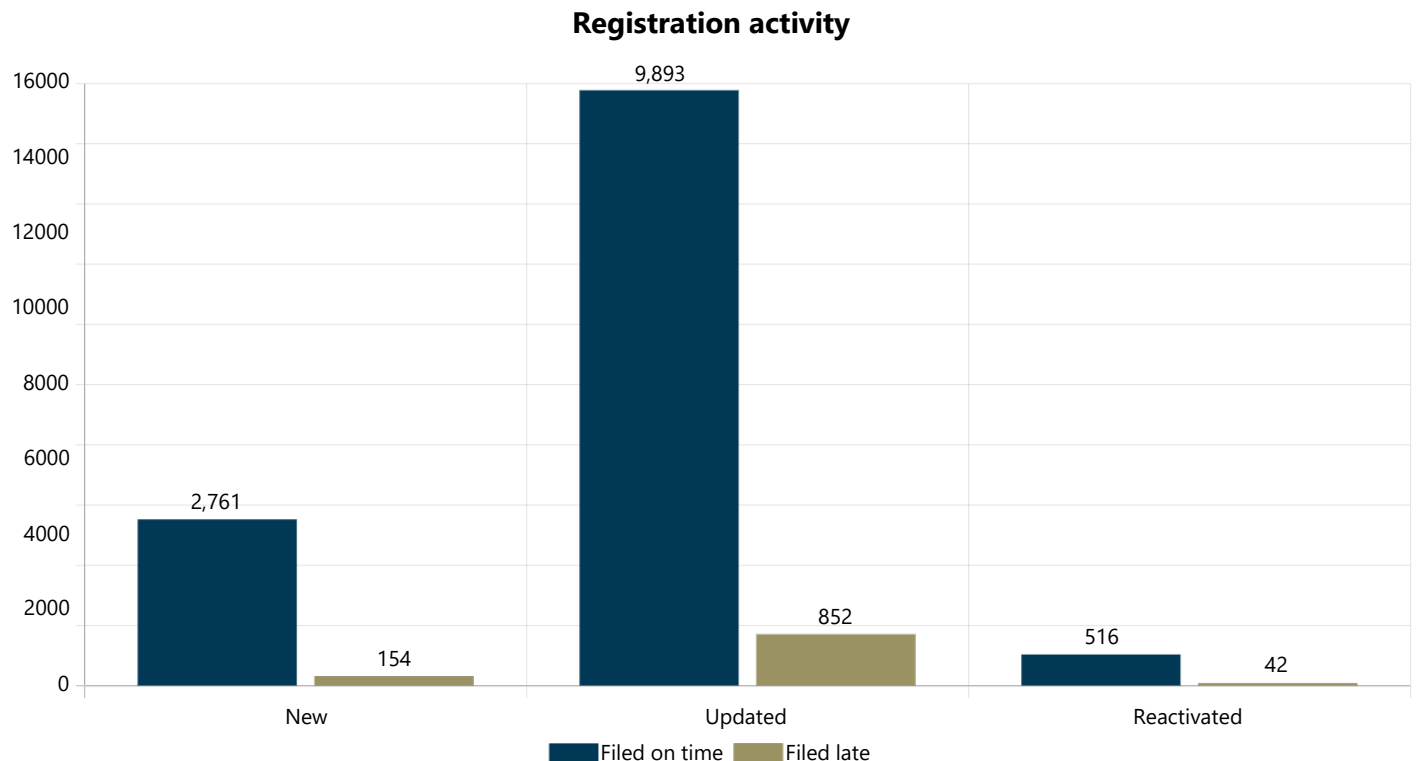
As in previous years, registration updates were the most frequent type of late registration, representing 81% of all late registrations. Consultants and organizations accounted for the largest proportion of late registration updates, with 39% and 41% respectively.

Notably, consultant lobbyists were responsible for nearly all late new registrations accounting for 98%—or all but 3— of the 154 late new registrations. Consultants also accounted for 83% of the late reactivations. In the absence of a legislative framework that allows for a spectrum of sanctions, the Office continues to educate lobbyists about their reporting obligations and where appropriate, monitors their compliance for one year to reinforce awareness of their obligations.

Timeliness of registrations



Registration activity



Type of late registrations

Type	Consultant	Organization	Corporation	Combined
New	151	1	2	154
Reactivations	35	5	2	42
Updates	334	352	166	852
Total	520	358	170	1048

Data captured on 2025-03-31, for reports filed between 2024-04-01 and 2025-03-31.

Late registrations table

Period	Consultant	Organization	Corporation	Combined
1-15 days	212	103	43	358
16-30 days	86	83	39	208
31-90 days	151	119	60	330
91-180 days	53	42	21	116
More than 180 days	18	11	7	36
Total	520	358	170	1048

Data captured on 2025-03-31, for reports filed between 2024-04-01 and 2025-03-31.

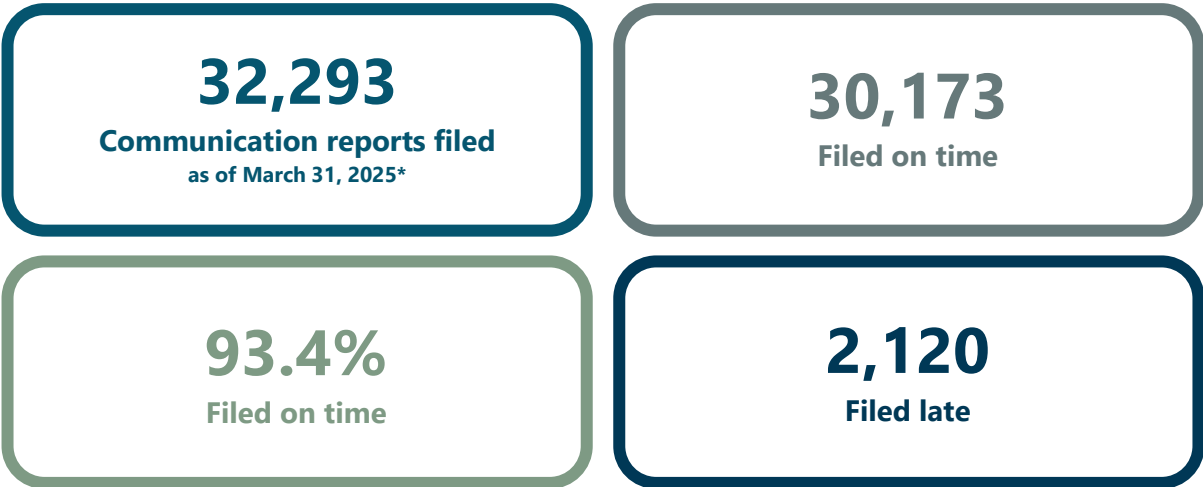
Late communication reports

In 2024-25, 2,120 communication reports were filed late, a modest decrease of 20 late reports compared to the previous year. While 93.4% of communication reports were filed on time, any late report hinders transparency.

The vast majority of late reports were submitted between 1 and 15 days late, at nearly 57%, while nearly 36% were submitted between 16 to 180 days late. Disappointingly, more than 7% were submitted more than 180 days late.

Even a small number of late reports can hinder timely public access to lobbying information. The Office continues to emphasize the importance of timely reporting and works with registrants to improve compliance through education and monitoring.

Timeliness of communication reports



*Data captured on 2025-03-31, for reports filed between 2024-04-01 and 2025-03-31, which would include oral and arranged communications filed late from previous years.

Late communication reports table

Period	Consultant	Organization	Corporation	Combined
1-15 days	381	599	224	1,204
16-30 days	36	141	62	239
31-90 days	49	270	48	367
91-180 days	48	72	31	151
More than 180 days	85	44	30	159
Total	599	1,126	395	2,120

Data captured on 2025-03-31, for reports filed between 2024-04-01 and 2025-03-31.

Verification of communication reports

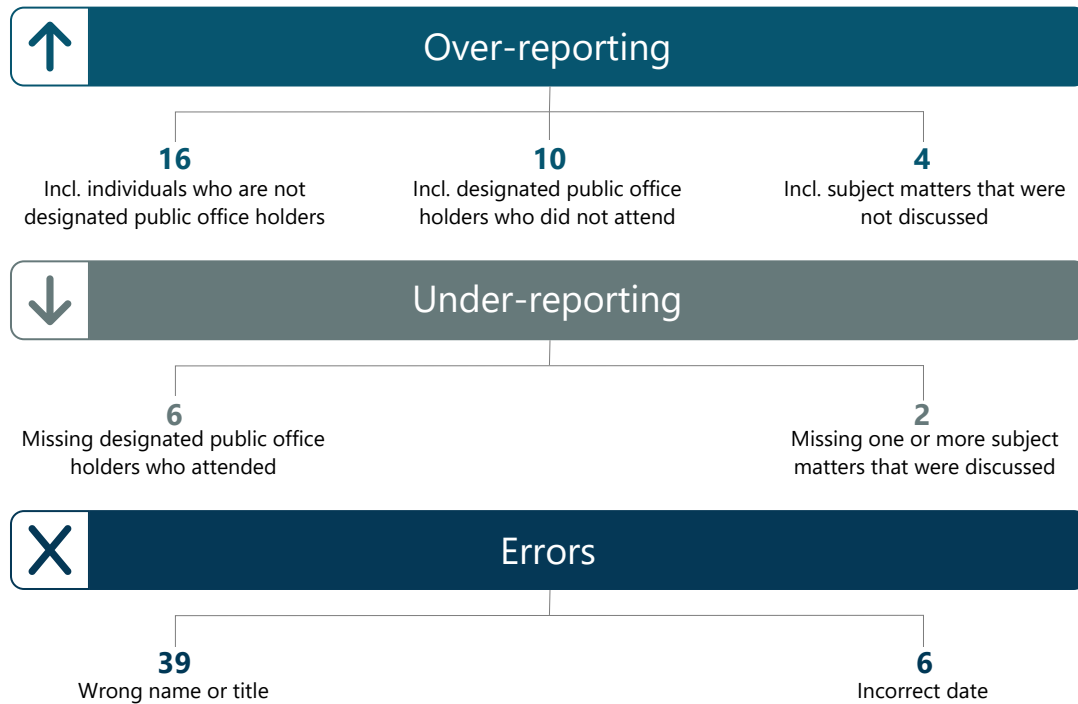
To ensure accurate reporting by lobbyists, the Office extracts a sample (5%) of new communication reports filed in the Registry of Lobbyists every month and asks the designated public office holders named in them to confirm whether the information submitted in the reports is complete and accurate.

To allow the implementation of changes to communication reports requiring the addition of the subject matter details, the Office briefly paused its verification of communication reports. During October and November 2024, no verifications were conducted, resulting in a slightly lower than normal number of verified reports.

In 2024-25, designated public office holders named in 1,064 communication reports reviewed the information and confirmed that 929 reports, just over 87%, were complete and accurate. This marked a 2% increase over 2023-24.

The 110 communication reports that were inaccurate contained 117 inaccuracies as some contained more than one error. The Office reaches out to registrants and requests that they correct inaccuracies.

Common inaccuracies in communication reports



Registration and advisory services

To ensure compliance as well as accurate and consistent data in the Registry of Lobbyists, the Registration and Advisory Services team reviews all new, updated, and reactivated registrations to verify that they meet all the disclosure requirements outlined in the *Lobbying Act*.

In addition to these reviews, the team delivers information sessions to help lobbyists understand their obligations under the *Lobbying Act* and the *Lobbyists' Code of Conduct*. The team also answers inquiries from stakeholders on a wide range of topics and reaches out to lobbyists to offer advice and support.

Reviewing registrations

Between April 1, 2024, and March 31, 2025, the team reviewed and posted 14,215 registrations, including new, reactivated, and updated registrations. This represents an average of 1,185 registrations per month and marks a 31% increase compared to the previous year.

Of the 14,215 registrations reviewed, 2,143—approximately 15%—were returned to the registrant at least once for corrections following a review by one of our advisors. Of these, 362 were sent back more than once.

In 2024-25, the number of new registrations totaled 2,912, a 3% decrease from 2023-24. However, the number of updated registrations rose to 10,745, an increase of 46% from 7,357 the previous year while reactivated registrations also increased by 18%, from 472 to 558.

Inquiries by source



Type	Calls	Emails	Combined	Percentage
Lobbyist (incl. representatives)	2,773	2,471	5,244	86.2
Potential lobbyist or client of a lobbyist	53	140	193	3.2
Public office holder (current and former)	118	250	368	6.0
General public	142	115	257	4.2
Other (e.g. academics)	18	4	22	0.4
Total	3,104	2,980	6,084	100

Inquiries by topic



Type	Calls	Emails	Combined	Percentage
Registration support	1,987	1,691	3,678	47.8
<i>Lobbying Act</i> and regulations	617	800	1,417	18.4
Registration details	1,089	574	1,663	21.6
<i>Lobbyists' Code of Conduct</i>	87	464	551	7.2
Other (mandate, allegations, outreach requests)	120	263	383	5.0
Total	3,900	3,792	7,692	100

Registration and Advisory Services service standards

A continuously increasing volume of calls and emails has not deterred the Registration and Advisory Services team from providing exceptional service throughout 2024-25.

The team met or exceeded all their service standards, achieving an outstanding 100% result in four out of five service standards.

Service standards for Registration and Advisory Services



2024-25 Service standards	Target	Result
Respond to simple email within 2 business days	90%	100%
Respond to complex emails within 10 business days	85%	100%
Respond to telephone calls within 30 seconds	80%	90.7%
Review new registrations within 3 business days	100%	100%
Process voicemails within 1 business day	85%	100%

Improving the Registry

As part of its ongoing commitment to improving the Registry of Lobbyists, a number of updates were implemented in 2024-25 to both the public-facing interface and the secure, account-based filing system for lobbyists.

Communication reports – connecting subject matters and their details

Building on the work done last fiscal year connecting subject matter to their details in registrations, the Office introduced similar changes to communication reports. As of October 2024, registrants are required to identify both the general subject matter as well as the corresponding details in communication reports. These are selected from the subject matters and the details listed in their registration.

Through this update, we are enabling improved transparency by providing increased awareness of the information discussed during lobbying communications.

Submitting gifts and hospitality exemption requests online

In September 2024, the Office streamlined the process for requesting exemptions to the *Lobbyists' Code of Conduct* rules on gifts and hospitality.

Registrants can now submit their request online directly and securely through the Registry, using a standardized online form.

This new form reduces unnecessary delays by guiding registrants through the information required to evaluate the request.

Amendment of inactive versions of registrations by registrants

As of March 9, 2025, the Office provided registrants with the ability to amend sections of inactive versions of their registrations. The Office reviews and approves the amendments before they are made public in the Registry. The amendment and its date are then displayed as an addendum to the original information.

Currently, registrants can only amend the "Subject Matter Details" and "Government Funding" sections of inactive versions of their registration(s). We anticipate expanding this function to other sections of the registration in the future.

This change supports our commitment to transparency and the accuracy of information on the Registry, while also enabling a more efficient use of internal resources to continue improving the Registry.

Spotlight

Election readiness

When Parliament was dissolved on March 23, 2025, our efforts to prepare for the next election were already well underway. In anticipation of an election in 2025, we assessed potential implications of the *Lobbying Act* and *Lobbyists' Code of Conduct* with the aim of supporting compliance with both instruments.

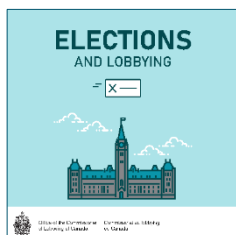
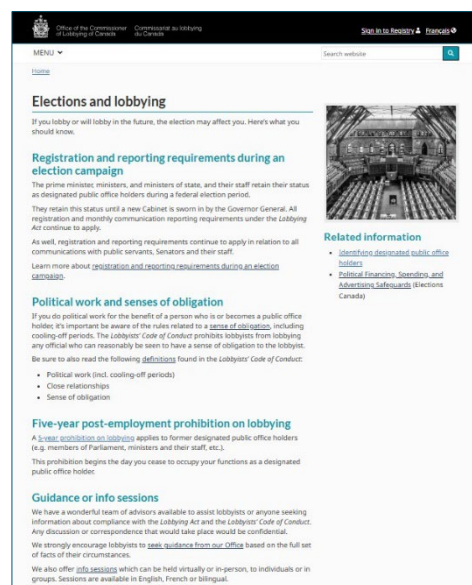
Accordingly, we published "Elections and lobbying", a dedicated page on the Office's website. Featured on the home page, it allowed lobbyists, public office holders, and Canadians alike to quickly access information about lobbying in the context of an election.

It featured information on:

- registration and reporting requirements during an election period, including the status of elected officials and their staff
- political work and senses of obligation
- the five-year restriction on lobbying for former designated public office holders

Between March 24 and May 15, 2025, the page was consulted over 430 times by over 320 unique visitors. Unsurprisingly because of the increase in political work during an election, the *Lobbyists' Code of Conduct* page received the most traffic.

While the Commissioner does not regulate political work, the Code prohibits lobbyists from lobbying any official who can reasonably be seen to have a sense of obligation toward the lobbyist, including because of political work. When the Code was updated in 2023, specific rules and definitions on political work and related cooling-off periods were incorporated.



Drawing from our carefully maintained list, we also reached out to 64 members of Parliament (MPs) who were not seeking re-election to inform them of their obligations under the *Lobbying Act*.

Following the results of the 45th general election, we reached out to 39 incumbents who were not re-elected to share the same information.

From the day an elected official ceases to occupy their functions as a member of Parliament, they become a former designated public office holder (DPOH) and are now subject to a five-year restriction on lobbying at the federal level.

As new and seasoned MPs return to Parliament, we continue our outreach and education efforts to enable transparent lobbying conducted with high ethical standards.

Ensuring compliance

Compliance

The Compliance Directorate ensures that registrants, lobbyists, and former designated public office holders meet their obligations by conducting a variety of activities to enforce the *Lobbying Act* and the *Lobbyists' Code of Conduct*.

In addition to 34 compliance files carried over from the previous year, which included 1 investigation, the Office initiated 25 preliminary assessments during the 2024-25 fiscal year. The Commissioner closed 21 files at the preliminary assessment stage, while 2 progressed into investigations.

During the year, the Commissioner referred 1 investigation to the Royal Canadian Mounted Police (RCMP) after determining there were reasonable grounds to believe an offence had occurred under the *Lobbying Act*. When the Commissioner refers a file to the RCMP, she must suspend her investigation.

Compliance statistics

Investigation activities	Description	Total
Preliminary assessments initiated	<ul style="list-style-type: none">• 7 from external referrals• 18 from internal monitoring	25
Cases closed at the preliminary assessment stage	<ul style="list-style-type: none">• 7 no evidence of registrable lobbying• 7 no evidence that significant part of duties was met• 3 no evidence of missing or incorrect information in a registration• 4 investigations not necessary to ensure compliance under the <i>Lobbyists' Code of Conduct</i>	21
Investigations ceased		3
Investigations referred to the RCMP in 2024-25		1
Cases as of March 31, 2025	<ul style="list-style-type: none">• 35 at the preliminary assessment stage• 2 ongoing investigations	37

In 2024-25, the RCMP returned 3 files referred by the Commissioner without laying charges. As of March 31, 2025, the Commissioner had ceased those investigations.

At the close of the fiscal year on March 31, 2025, there were 35 files at the preliminary assessment stage, 2 ongoing investigations and 4 suspended files, 3 of which are with the RCMP while 1 continues to be suspended pursuant to subsection 10.4(8) of the *Lobbying Act* because the Commissioner became aware of an ongoing parallel investigation on the same subject matter.

Compliance assessments and letters

In addition to its investigation efforts, the Office undertakes a variety of activities to verify compliance with the *Lobbying Act* and the *Lobbyists' Code of Conduct*.

Throughout 2024-25, the Office sent 23 compliance letters to lobbyists, 12 of which were to ensure compliance with the hospitality rules of the *Lobbyists' Code of Conduct*.

The Office also conducts compliance assessments to address late filings of registrations and late filings of communication reports. Regular monitoring is conducted for a period of 1 year to ensure continued compliance. In 2024-25, 13 lobbyists were monitored.

Update on charges laid under the Lobbying Act

Gerald Paulin

As set out in last year's annual report, the RCMP formally charged Gerald Paulin under the *Lobbying Act* following a referral by the Commissioner of Lobbying in September 2020.

Mr. Paulin is alleged not only to have failed to file a return after undertaking to communicate and to arrange a meeting with a public office holder, but also to have received a payment contingent on the outcome of a registrable matter.

Proceedings were instituted against Mr. Paulin in the Ontario Court of Justice in Thunder Bay in March 2024. The Court subsequently heard a peremptory defence on May 12, 2025, and set the next court appearance for June 16, 2025.

Exemption requests for the five-year restriction on lobbying

In 2024-25, the Office received 14 applications for exemptions to the [five-year restriction on lobbying](#) from former designated public office holders. Another 2 applications were carried over from the previous year.

Of these 16 requests:

- 5 were granted
- 6 were denied
- 4 were withdrawn
- 1 was carried over to 2025-26

While slightly lower than the number of requests received last year, the amount remains significantly higher than the number of requests received in other previous years.

Service standards for requests for exemptions to the 5-year restriction on lobbying

Standard	Performance	Notes
A letter sent by the Commissioner within 60 days of receiving an accurately completed application to either grant or to obtain further representations.	100%	The Commissioner informs the applicant of the decision. In cases where the recommendation by the Directorate is to deny the request, the applicant is offered the opportunity to submit additional information.
Applicant informed of the Commissioner’s final decision within 30 days of the applicant’s submitting further representations.	100%	The Commissioner sends a letter informing the applicant of the final decision.
Exemptions granted are made publicly available within 48 hours of the effective date of the Commissioner’s decision.	100%	All exemptions are published online.

Spotlight

More ways to stay informed

In 2024-25, the Office set out to increase our reach and improve proactive communications by launching two initiatives aimed at providing more accessible and timely information to stakeholders.

Email distribution list

On January 13, 2025, we launched an email distribution list to offer subscribers timely updates on developments from the Office. Whether we have new educational resources, investigation reports, announcements or new features on the Registry of Lobbyists, subscribers can [stay informed](#) by receiving the latest information from the Office directly in their inbox.



Our first mailout was successfully issued in May 2025, to introduce a new resource related to [gifts and hospitality](#) under the *Lobbyists' Code of Conduct*. We expect to issue regular updates moving forward and to increase our number of subscribers.

LinkedIn

Shortly after the launch of the email distribution list, we launched the Office's LinkedIn page on January 30, 2025. This platform allows us to reach a broader professional audience, including lobbyists, public office holders, journalists, academics, and engaged citizens.

Although the Office did have an existing LinkedIn page, it had remained static with no published content. With this launch, the page serves as an active channel for sharing information. Our posts include information about specific aspects of the Act or the Code, monthly reminders to submit communication reports, and other relevant updates to promote transparency and uphold high ethical standards in the lobbying of federal officials.

Our most impactful post to date featured the introduction of the new and timely "Elections and Lobbying" web page. This post alone attracted over 100 new followers and increased traffic to our website.

Search alerts – Registry of Lobbyists

Both new initiatives described above complement existing tools such as the Registry of Lobbyists' search alerts. In 2024-25, 380 search alerts were created by 239 unique users, triggering more than 16,500 results.

With these resources, we're making it easier than ever for Canadians to learn about federal lobbying.

Expanding awareness and understanding

Outreach and education

The Office actively engages with lobbyists, public office holders, members of media, and the general public to raise awareness of the *Lobbying Act* and the *Lobbyists' Code of Conduct*. These outreach efforts foster understanding and support compliance with both the Act and the Code.

In 2024-25, we met with 1,099 stakeholders through 119 presentations to lobbyists, public office holders, international organizations, other interested parties, etc. Several of these presentations were made to students to help them better understand how transparent and ethical lobbying is essential to a healthy democracy.

Additionally, the Office issued advisory letters to 14 individuals identified in media reports following announcements of their employment with government relations firms, organizations, or corporations engaged in federal lobbying. These letters serve to inform potential lobbyists about registration and reporting obligations under the *Lobbying Act*, promoting compliance and transparency.

The Office also reached out to 18 designated public office holders outlining the 5-year restriction on lobbying that applies to them after the cease to occupy their position. Shortly after the election was announced, an additional 64 letters were sent to those not seeking re-election to inform them of their obligations under the *Lobbying Act*.

Presentations to stakeholders



Throughout 2024-25, a variety of resources were developed or updated. This included a primer related to how the rules on [gifts and hospitality](#) apply in practice, a new timeline on the [history of the lobbying regime](#) in Canada, and two updated interpretation bulletins.

Media engagement

The Office of the Commissioner of Lobbying is committed to providing the media with timely, accurate and appropriate information regarding Canada’s lobbying regime.

In 2024–25, the Office responded to a total of 62 media inquiries, reflecting sustained interest in the Commissioner’s mandate and activities.

Media inquiries covered a range of topics, with the most frequent questions relating to the *Lobbying Act* and *Lobbyists’ Code of Conduct*, which accounted for 32% (20) of the total number of inquiries.

Compliance activities, including investigations, was another common topic with 21% (13) of the received inquiries.

The Registry of Lobbyists was the third most common topic with 19% (12) of the questions. We assisted journalists in locating specific information in the Registry, in clarifying information about registrations or communication reports or by simply confirming the accuracy of their findings from their registry search.

The Commissioner also participated in seven media interviews, providing insights into the Office’s work and reinforcing its commitment to openness and accountability.



Common goals of transparency and accountability

Canada’s long-standing experience in regulating lobbying activities positions the Office well to share its experience and contribute to the discourse around transparency and ethical lobbying of government officials.

Common standards for lobbying transparency and accountability support the development of systems that can strengthen democracies. The ongoing collaboration with provincial and international counterparts provides opportunities to share expertise among participants to help foster effective, accountable, and inclusive institutions at all levels.

Lobbyists Registrars and Commissioners Network

Each year, Commissioner Bélanger and employees of the Office participate in two meetings with the [Lobbyists Registrars and Commissioners Network](#) (LRCN) to share best practices and provide updates related to their respective regimes.

In September 2024, the Office was pleased to host the LRCN in Ottawa for its annual in-person meeting. The Commissioners and Registrars discussed the range of thresholds for in-house lobbying registration in their respective federal, provincial, and municipal regimes and considered the merits of registration by default.

Members of the LRCN were joined virtually by representatives of the Organisation for Economic Co-operation and Development's (OECD) who provided an overview of the OECD's 2024 Recommendations on Transparency and Integrity in Lobbying and Influence.

The LRCN's annual virtual meeting was hosted by the Office of the Integrity Commissioner of Ontario in February 2025.



Council on Governmental Ethics Laws (COGEL)

The Council on Governmental Ethics Laws (COGEL) is a largely U.S.-Canada-based professional organization for government regulators and others working in ethics, elections, freedom of information, lobbying, and campaign finance.

In December 2024, Commissioner Bélanger attended the annual COGEL Conference in Los Angeles, California. The conference allows members to share a wealth of knowledge and expertise. To this end, Commissioner Bélanger provided an update on developments in the Canadian federal lobbying landscape and moderated a panel on stakeholder education on a budget.

Organization for Economic Cooperation and Development (OECD)

Each year, the Organization for Economic Cooperation and Development (OECD) brings together leaders from around the world who share a common goal of improving transparency and integrity.

In March 2025, the Commissioner and the Office's Director of Registration, Policy and Public Affairs attended the [Global Anti-Corruption and Integrity Forum](#) to exchange best practices, participate in a working group on integrity indicators and to attend the in-person OECD Meeting of Lobbying Commissioners, Registrars and Oversight Entities.

Parliamentary activities

The Commissioner of Lobbying reports to Parliament through the [Standing Committee on Access to Information, Privacy and Ethics](#) (ETHI). In 2024-25, Commissioner Bélanger testified before the Committee on two occasions.

On April 16, 2024, Commissioner Bélanger appeared before the Committee to [discuss Main Estimates 2024-2025](#). The Commissioner and committee members' discussions continued to highlight some of the shortcomings in the *Lobbying Act*, notably with the "significant part of duties" threshold and the lack of a spectrum of sanctions.

Commissioner Bélanger also appeared before ETHI on November 5, 2024, as the Committee considered her [nomination to the position of Commissioner of Lobbying](#) for a second seven-year term. The Committee supported her re-appointment and presented the certificate of nomination to the House of Commons on November 7, 2024. The Senate approved the reappointment in a resolution dated October 29, 2024. Commissioner Bélanger was reappointed, effective December 30, 2024.

Following her re-appointment, the Commissioner reached out to Senators, offering to meet with them to discuss her mandate and priorities. This outreach resulted in 6 meetings with individual Senators, with additional meetings anticipated in 2025-26.

Workings of the Office

In the backdrop of fulfilling its mandate, the Office must also meet organizational obligations and ensure smooth day-to-day operations.

Following the government's return-to-work directive in the fall of 2024, employees and executives increased their in-office presence to three days and four days a week, respectively. All employees share at least one common in-office day to facilitate collaborative work and all-staff meetings.

Fall staff meeting

In November 2024, the Office held an all-day, all-staff meeting at the [Native Women's Association of Canada](#). This was an opportunity for the entire team to share information, have broader discussions on issues that span the entire organization and interact with team members in a different setting.

This meeting focused on organizational performance indicators, workplace culture and updates from various teams. Employees also had the opportunity to participate in an indigenous workshop.

Values and ethics

As ethics is at the core of the Office's mandate, employees participate in both formal and informal discussions on values and ethics on a continuous basis. In 2024-2025, activities included an organization-wide discussion related to the Office's Values and Ethics Code that involved a study of scenarios. In addition, two employees of the Office also participated in a values and ethics event held by the Clerk and Deputy Clerks of the Privy Council entitled "What Unites Us, Defines Us".

Accessibility

In December 2024, the Office published its first [progress report](#) on the implementation of its [Accessibility Plan 2023-25](#), in accordance with the *Accessible Canada Act*. The progress report highlights the variety of initiatives that were taken in 2024-2025 to improve and promote accessibility.

In August 2024, the Office engaged the Accessibility, Accommodation and Adaptive Computer Technology (AAACT) team to assess the accessibility of a subset of frequently accessed pages from the website and the Lobbyists Registration System (LRS). The Office put an action plan in place in response to the resulting recommendations. By March 31, 2025, all [actions related to the website](#) were completed, including applying some of the recommendations to web pages that were not covered by the review. Several of the [actions related to the LRS](#) were also completed and plans are in place for the remainder of the recommendations. Our efforts in improving the accessibility of our website and the LRS will continue.

Strain on resources

The Office allocates most of its limited human and financial resources to fulfilling its mandate related to the regulation of lobbying. However, despite being a micro-organization and an institution supporting an independent agent of Parliament, we must undertake a wide range of corporate functions typically supported by full teams in much larger departments.

Not only must the Office prepare the same accountability reports required by large departments, but as a function of being a micro-organization, it must also prepare and manage memoranda of understanding with other federal entities for the provision of essential services such as human resources, finances, contracting, security, and IT support.

The reality is that the Office simply does not have the levels of financial resources or the depth of human resources comparable to those of other federal organizations to effectively respond to reporting requirements that do not contemplate or account for the size and resource capability of micro-organizations like us.

The Office accomplished its work in 2024-2025 with a budget of approximately \$6.2 million. Roughly \$4.6 million of this budget is for salaries and benefits, leaving our operation and maintenance budget to approximately \$1.6 million. About \$700K of this budget is for obtaining services from other government institutions, including services related to human resources, finance, procurement, and information technology.

Spotlight

Mental health

As part of the exceptional workplace pillar of our strategic plan, we, at the Office of the Commissioner Lobbying, aim to build a respectful and understanding workplace that supports the organization's resiliency and productivity through employee well-being.

Developed by our Mental Health Committee, our mental health strategy is fundamentally targeted at ensuring employees have appropriate mental health supports and resources in the workplace.

The strategy offers a range of activities that balance learning, team building and developing a positive work environment that encourages open discussion. In 2024-25, our activities included:

- a presentation from the Office of the Ombuds for Small Departments and Agencies called *Live Better with Anxiety*
- a collaborative activity with mental health tasks
- a team lunch and a team-building activity for Bell Let's Talk
- weekly emails with valuable resources during Healthy Workplace Month

In addition, we continue to promote the Employee Assistance Program (EAP), LifeSpeak, and Torchlight, which are all services offered by Health Canada's EAP program. We share mental health information, resources and events from a variety of sources including EAP and the Canadian Innovation Centre for Mental Health in the Workplace. Several members of our staff have also taken the Mental Health First Aid course offered by the Mental Health Commission of Canada.

Our continuous efforts in maintaining an excellent work environment have been a critical factor in achieving our goals.

While the 2024 Public Service Employment Survey (PSES) results were not released in time for the publication of our 2024-25 annual report, results from the previous PSES reflect our efforts in this area. The 2022 results showed that 100% of employees agreed that the Office "does a good job of raising awareness of mental health in the workplace".

Looking ahead

The focus for the beginning of 2025-26 fiscal year is shaped by the April 2025 election. With a new Parliament in place, one key priority is ensuring that both outgoing and incoming MPs are well-informed of the requirements under the *Lobbying Act* and are aware of the obligations and ethical standards expected of those who lobby them.

An upcoming highlight will be the release of an interpretation bulletin that will redefine the Commissioner's interpretation of "significant part of duties", the threshold that triggers the requirement for organizations and corporations to be registered in the Registry of Lobbyists. As a similar expression (i.e. "significant part of the individual's work") is also referenced in the five-year restriction on lobbying for former designated public office holders, a corresponding interpretation will also be issued.

Originally planned for early 2025, their publication was delayed due to the prorogation of Parliament in early January. They are now expected to be released in early summer 2025, followed by a 6-month period before they come into effect. We will update our educational material accordingly and will expand our outreach and awareness activities to support the understanding of this change.

Throughout 2025-26, with the hard work and dedication of employees, we expect to continue to look for ways to enhance how we support our mandate of ensuring transparency, compliance and awareness of Canada's lobbying regime.

It has now been more than 15 years since the *Lobbying Act* and its regulations were updated. The Commissioner is actively developing new and updated recommendations to provide parliamentarians with a renewed vision for modernizing the *Lobbying Act*.

Building on the preliminary recommendations released in 2021, the Commissioner also plans to seek regulatory updates to make lobbying registration more effective in accordance with its legislated purpose.

We must continue to advocate for increased transparency and ethical behaviour in the lobbying of federal officials to support public trust in our democracy.