



**CSPA**  **ACPA**  
Canadian  
Steel  
Producers  
Association      L'Association  
canadienne des  
producteurs  
d'acier

December 15, 2014

Ms. Karen Shepherd  
Commissioner of Lobbying  
255 Albert Street, 10<sup>th</sup> Floor  
Ottawa, Ontario  
K1A 0R5

Dear Commissioner:

The Canadian Steel Producers Association (CSPA) is pleased to comment on the proposed revision of the Lobbyists' Code of Conduct.

CSPA certainly supports the intention to ensure that the Code is updated from time to time to reflect current practices and new issues that can arise. As lobbyists, CSPA always strives to maintain a high standard of ethical behavior, transparency and responsibility in our multiple interactions with senior government officials.

In support of such principles, it is important that the Code be administered by your Office in a manner that enables effective participation by organizations such as our own to contribute to strong public policy outcomes. While most of the proposed changes support this principle, we are very concerned with the proposed changes to Rule 8.

I have consulted on this matter with colleagues from other industry trade associations, and have reviewed the attached submission dated December 5, 2014 that was co-submitted by several counterparts. Rather than restate those representations, which CSPA supports, I will add a further related point.

The work of organizations like CSPA is attractive because of the opportunity to engage in the public policy process with senior elected and unelected officials. Were the new prohibitions in Rule 8 in place, it would be much more difficult to attract people to this work, since many people in government, through years of work on either side of the policy table, through social and community interaction, or even through being neighbours in Ottawa. Prohibitions on dealing with such friends an imprecise term with many interpretations would deter some very good people from joining this line of work. Extending this prohibition to persons elsewhere in the organization, (with additional definition ambiguity) of such "friends" would compound this effect.

For all these reasons, therefore, CSPA urges your office to reconsider the proposed change to Rule 8, and to consult more directly with organizations that stand to be impacted for reasons presented in this, and other submissions.

Thank you for your consideration of this submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron Watkins', with a stylized flourish at the end.

Ron Watkins  
President

Encl.