CANADIAN
ADVOCACY
NETWORK

December 19, 2014

Ms. Karen Shepherd
Commissioner of Lobbying
255 Albert St., 10th Floor
Ottawa, Ontario
K1A 0R5

Via email: consultation@ocl-cal.gc.ca

Dear Ms. Shepherd,

On behalf of the Canadian Advocacy Network (CAN), please accept this brief submission regarding proposed amendments to the *Lobbyists' Code of Conduct.*

As background, CAN was created to give Canadian charities and not-for-profit organizations the opportunity to access pro-bono external relations advice and expertise. CAN does not lobby on behalf of organizations, but rather serves as a connector, ensuring that these organizations are matched with interested professionals who are looking to volunteer their time and expertise.

CAN would like to emphasize its overall support for the objectives of the *Lobbyists' Code of Conduct* and express our appreciation for the work of you and your office to ensure transparency and accountability in the lobbying of public office holders, in order to increase the public's confidence in the integrity of government decision-making.

We as a Board do not claim to advocate on behalf of charitable/not-for-profit organizations *or* volunteers that work with one another via CAN. However, we do want to voice our support for the implementation of provisions in the Code of Conduct that are easy to interpret and therefore abide by, especially for the charitable and not-for-profit sector.

Related, we are particularly supportive of Imagine Canada's recommendation that, "in the absence of a clear and reasonable definition", the use of the word "friend" be struck from the proposed Code of Conduct. CAN feels that without a robust definition, a range of unintended consequences may have serious, detrimental impacts on the work of charities and not-for-profit organizations, among others.

Thank you in advance for your consideration and for your work on this important initiative.

If you have additional questions, I can be reached at 613-783-6085.

Sincerely,

Philip Cartwright
President
Canadian Advocacy Network (CAN)