



December 17, 2014

Ms. Karen Shepherd
Commissioner of Lobbying
255 Albert Street
Ottawa, Ontario
K1A 0R5

Dear Ms. Shepherd,

Thank you for the opportunity to provide you with our views and comments on your proposed changes to the *Lobbyists' Code of Conduct*.

The Aerospace Industries Association of Canada (AIAC) is a not-for-profit association representing the interests of over 700 aerospace companies across Canada. As the national voice of Canada's aerospace industry, advocacy to government on matters of public policy is essential to our ability to provide value to our members. The *Lobbying Act* ("the Act") and the *Lobbyists' Code of Conduct* ("the Code") plays a critical role in protecting the integrity of our legislative process, as well as the ability of our industry to be meaningfully engaged that process, and we are committed to ensuring our ongoing compliance with both the Act and the Code.

As part of this commitment, we have reviewed the Background Paper you provided as part of your revisions to the Code. While we have no concerns with the majority of the changes you have proposed, we wish to provide feedback on three areas of concern.

Rule 8 of the revised Code states, "*A lobbyist shall not lobby a public office holder who is a relative or friend of the lobbyist or has financial or business dealings with the lobbyist. A lobbyist shall also not lobby other public office holders who work within that public office holder's area of responsibility.*"

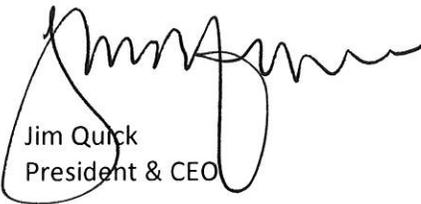
While we understand and support the intention behind this rule, we have two concerns with the language introduced. First, while the term "relative" is specific enough to be understood and measured, the use of the word "friend" in such a context is very vague and subject to a broad range of interpretation. Relationship-building is fundamental to all aspects of operating in society, including business and government, and the term "friend" is broadly used to describe many different kinds of relationships that convey various levels of engagement and emotional attachment. We are concerned that the language as it stands will create confusion and a lack of clarity regarding relationships between lobbyists and public office holders, and strongly recommend that, should you proceed with including this rule in the revised Code, a clear definition of the term be included.

We are also concerned with the term "area of responsibility" in Rule 8. No clear definition is provided for this term, leaving it open to misinterpretation and overly broad application that could dramatically limit the ability of public office holders to benefit from valuable information and contributions to public policy concerns. We therefore recommend that, at a minimum, greater clarity regarding the interpretation and application of the term "area of responsibility" be provided.

Finally, in Rule 4 you clarify the role of responsible officers, referring to them as “the most senior paid employee... of an organization or corporation”. For a small organization such as ours, which is based exclusively in Canada, this rule will have little to no impact. However, for large organizations, particularly those whose most senior paid employee is based abroad, this criterion could create a burden that unnecessarily requires travel and expense on the part of the responsible officer. As such, we recommend including a provision that would allow the officer to delegate this responsibility to a named representative.

Once again, please accept our thanks for the opportunity to provide you with our comments on the proposed changes to the *Lobbyists' Code of Conduct*. I would be happy to discuss this proposal with you and your staff at your convenience.

Yours sincerely,



Jim Quick
President & CEO