



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

December 19, 2014

Dear Ms. Shepherd:

Thank you for the opportunity to provide you with our perspective on the proposed changes to the *Lobbyists' Code of Conduct*.

As the largest association representing 137 colleges, institutes, CÉGEPs, polytechnics and universities with a college mandate at the national level, Colleges and Institutes Canada takes its obligations under the *Code of Conduct* very seriously.

We have reviewed the proposed modifications the Code of Conduct with considerable interest. While in principle we are supportive of the proposed direction, we would like to raise one area of concern for your consideration.

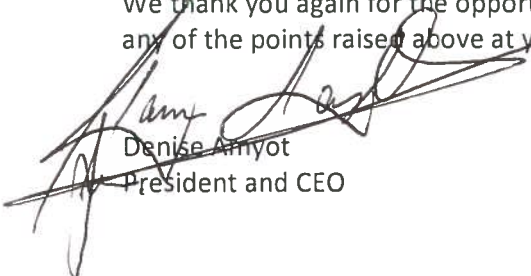
The proposed amendment states: *8. A lobbyist shall not lobby a public office holder who is a relative or friend of the lobbyist or has financial or business dealings with the lobbyist. A lobbyist shall also not lobby other public office holders who work within that public office holder's area of responsibility.*

This section raises several concerns. While the scope of three of the groups mentioned (relative of the lobbyist, or a person with financial or business dealings with the lobbyist) could be clearly defined, the fourth category, 'friend', is quite difficult to circumscribe. Given the ambiguity associated with the category 'friend', our recommendation is that the category be removed or, if kept, a very strict interpretation would need to be offered in order to avoid inconsistent and varied interpretations.

The second related concern is that if the *Code* does include a 'cooling off period', such a cooling off period would be very difficult to apply to the category of 'friend' and irrelevant when applied to the category of relative. Thus we would recommend that these categories be exempted from the 'cooling off period' if one is adopted.

The final concern is the scope of the 'public office holder's area of responsibility'. If a lobbyist had any of the ties described to the Prime Minister's Office, for example, one could interpret the section as prohibiting all interactions with elected and unelected Public Office Holders. We would therefore recommend that the scope of 'area of responsibility' be clearly defined.

We thank you again for the opportunity to comment and would be happy to provide further clarity on any of the points raised above at your convenience.



Denise Amyot
President and CEO