



Office of the Commissioner
of Lobbying of Canada

Commissariat au lobbying
du Canada

ANNUAL REPORT

2021-22



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Preface

This report is submitted to the Parliament of Canada pursuant to section 11 of the *Lobbying Act* (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



For the second consecutive fiscal year, we responded to the challenges of the COVID-19 pandemic and excelled. The year 2021-22 turned out to be another busy one, setting records for active registrations and active lobbyists, as well as setting a number of monthly records for reporting of oral communications with senior officials.

With this backdrop of record activity, we delivered on our mandate of regulating transparent and ethical federal lobbying. As part of our ongoing activities, we continued to maintain the Registry of Lobbyists, foster awareness and understanding of the [Lobbying Act](#) and the [Lobbyists' Code of Conduct](#), and conduct reviews and investigations to ensure compliance.

Key achievements include:

- modernizing the Registry of Lobbyists by improving usability and mobile friendliness
- publishing an Investigation Report to Parliament
- engaging Canadians in a consultation on the *Lobbyists' Code of Conduct*, and
- increasing the Office's international presence

None of this could have happened without the skill and talent of my small, dedicated team of professionals who achieved all of it while working remotely. I cannot thank them enough for their efforts and resilience.

Nancy Bélanger
Commissioner of Lobbying

ENABLING TRANSPARENCY

REGISTRY OF LOBBYISTS

The most senior paid officers of corporations or organizations must file an in-house registration for their corporations or organizations when they or their employees communicate with federal officials on listed subject matters and meet the registration threshold; consultant lobbyists must register if they agree to lobby for a client or to arrange a meeting between a public office holder and another person. Both consultants and senior paid officers for in-house lobbyists must [report certain communications](#) on a monthly basis in the [Registry of Lobbyists](#).

The Registry of Lobbyists offers Canadians reporting tools and statistics, as well as a powerful search function that enable the public to review and scrutinize the information lobbyists must file under the *Lobbying Act*.

Who engaged in lobbying



› **3,376** organizations and corporations named in registrations

- **2,103** paid at least one consultant to lobby on their behalf
- **733** filed in-house registrations
- **540** filed in-house registrations and paid at least one consultant to lobby on their behalf



› **8,069** individual lobbyists registered at least once during the fiscal year

- **1,453** consultants
- **6,616** in-house
 - **2,686** employed by corporations
 - **3,930** employed by organizations

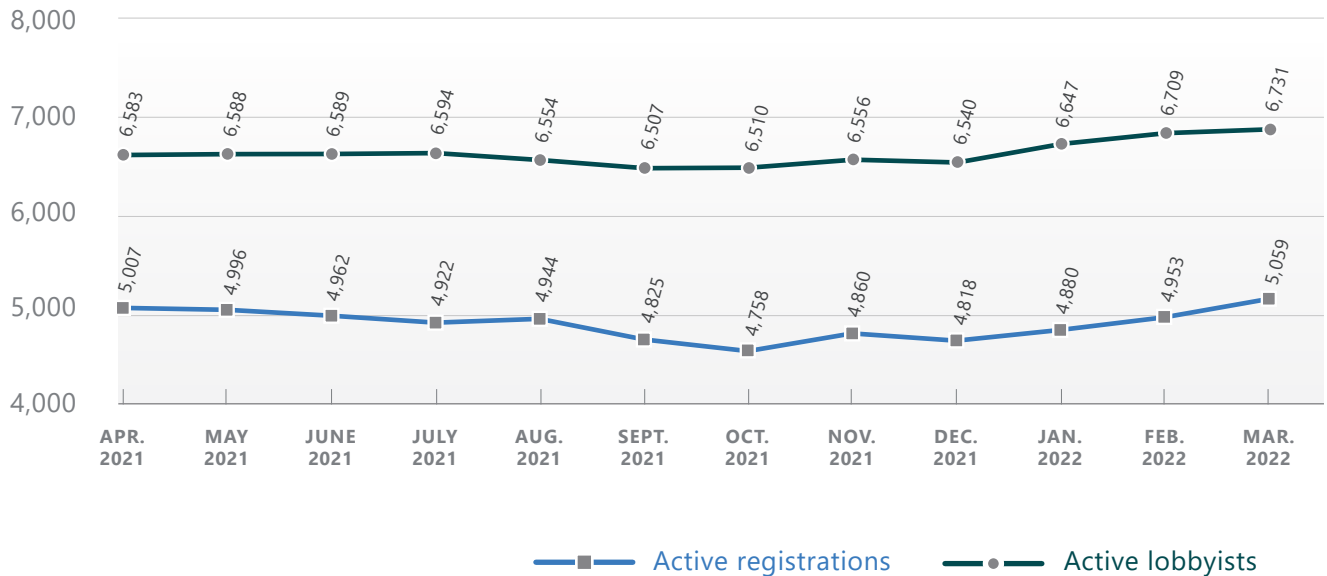
Who was lobbied (oral and arranged communications)

| Designated public office holder | Total communication reports |
|---|-----------------------------|
| Prime minister only | 53 |
| Officials in the Prime Minister's Office including where the prime minister also participated | 1,117 |
| Senators | 929 |
| Ministers | 1,836 |
| Members of Parliament | 9,465 |
| Deputy ministers, associate deputy ministers and assistant deputy ministers | 5,152 |

ACTIVE REGISTRATIONS AND ACTIVE LOBBYISTS

The 2021-22 fiscal year started with new monthly records for active registrations and active lobbyists and ended with all-time highs set in March 2022 for both. The figures below represent the number of registrations and lobbyists registered in each month.

Active lobbyists and active registrations



Subject matters in registrations and communication reports



Top-5 subject matters in registrations

1. Economic development
2. Industry
3. Health
4. Environment
5. Taxation and finance



Top-5 subject matters in communication reports

1. Health
2. Environment
3. Economic development
4. Industry
5. Agriculture

Government institutions in registrations and communication reports

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

| Top-5 government institutions in communication reports | |
|--|---|
| 1 | House of Commons |
| 2 | Innovation, Science and Economic Development Canada |
| 3 | Environment and Climate Change Canada |
| 4 | Finance Canada |
| 5 | Global Affairs Canada |

MONTHLY COMMUNICATION REPORTS

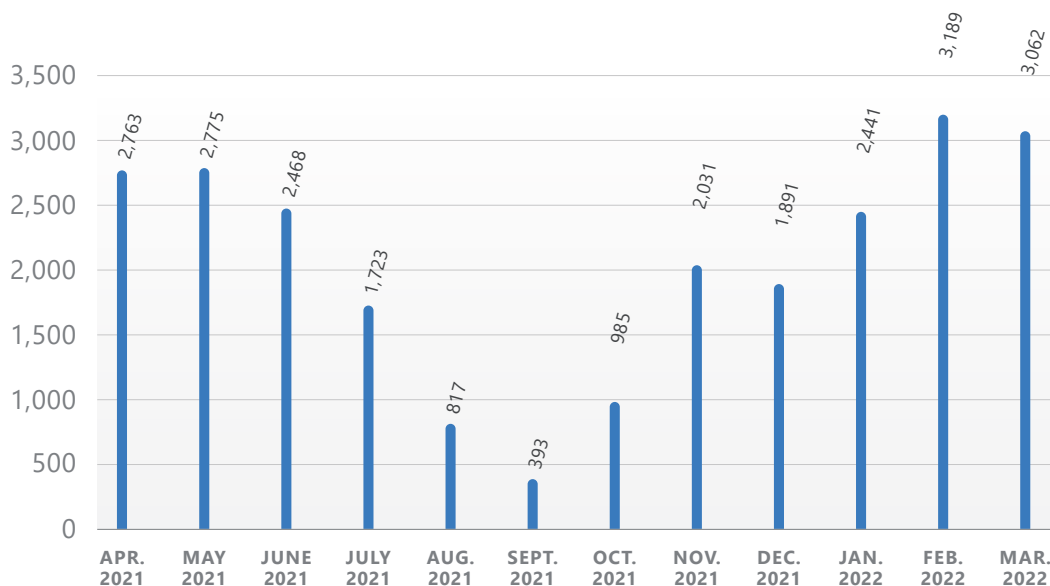
The first quarter of the 2021-22 fiscal year delivered records for communication reports in April and June. July 2021 saw the second highest total for that particular month since communication reporting began in 2008.

The Prime Minister called the 44th Canadian federal election on August 15, 2021, with the vote occurring September 20. Lobbying activity is typically slow during an election period and in the few months after the vote. In 2021-22, the federal campaign corresponded with a drop in communication reports that began in August and lasted through November compared to years without an election.

From there, December tied the monthly record for communication reporting and January set a new mark before the fiscal year ended with February topping 3,000 for the third consecutive year and March delivered a record number of reports for that month.

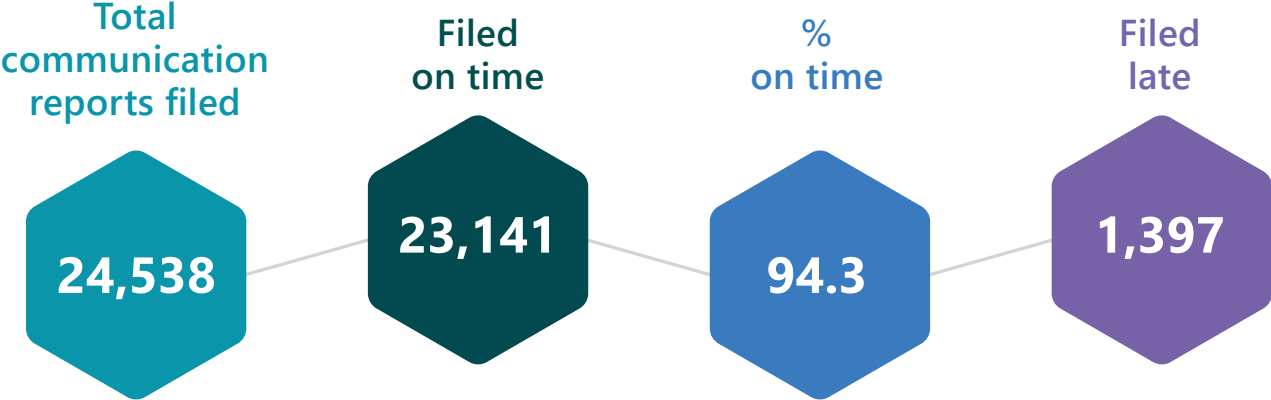
In the end, 2021-22 came out as the second busiest year for communications reporting with a total of 24,538 filed for the fiscal year. The record occurred in 2020-21, when approximately 29,000 communication reports were filed.

Communication reports



Note: All communication report numbers from the Registry of Lobbyists in this report were gathered on May 2, 2022. This increases the accuracy of the numbers in this report to include the communications of March 2022.

Timeliness of communication reports



Late communication reports

| Period | Consultant | Organization | Corporation | Totals |
|--------------------|------------|--------------|-------------|--------------|
| 1-15 days | 302 | 473 | 127 | 902 |
| 16-30 days | 43 | 122 | 37 | 202 |
| 31-90 days | 22 | 124 | 24 | 170 |
| 91-180 days | 15 | 28 | 18 | 61 |
| More than 180 days | 0 | 36 | 26 | 62 |
| Total late | 382 | 783 | 232 | 1,397 |

REGISTRATION AND CLIENT SERVICES

To ensure compliance as well as accurate and consistent data in the Registry of Lobbyists, the Registration and Client 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 assisting with registrations, the team delivers information sessions to lobbyists to help them understand their obligations under the *Lobbying Act* and the *Lobbyists' Code of Conduct*. The team answers inquiries from stakeholders on a wide range of topics and also reaches out to lobbyists to offer advice and support.

REVIEWING REGISTRATIONS

Between April 1, 2021, and March 31, 2022, the team reviewed and posted 8,001 new, reactivated and updated registrations, for an average of 667 per month. Of these, 1,520, or about 19%, were returned to the registrant only once for corrections, while another 274, or about 3.4%, were sent back for correction more than once.

Overall activity decreased 5.7% compared to 2020-21, likely due in part to the election and in part to the exceptional increases seen in the previous fiscal year where registration activity increased 24%. Compared to the numbers seen in the 2019-20 fiscal year, which also included an election, new registrations were up by 22%, updated registrations up by 15.9% and reactivated registrations down by 17.8%.

Registration activity

| Type | Total filed | Filed on time | % on time | Filed late |
|-------------|-------------|---------------|-----------|------------|
| New | 2,121 | 2,024 | 95.4 | 97 |
| Updated | 5,504 | 5,261 | 95.6 | 243 |
| Reactivated | 355 | 343 | 96.6 | 12 |
| Total | 8,001 | 7,649 | 95.6 | 352 |

Inquiries by source



| Type | Calls | Emails | Combined | Percent |
|--|--------------|--------------|--------------|------------|
| Lobbyist (incl. representatives) | 2,758 | 1,451 | 4,209 | 85.7 |
| Potential lobbyist or client of a lobbyist | 95 | 128 | 223 | 4.5 |
| Public office holder (current and former) | 115 | 164 | 279 | 5.7 |
| General public | 86 | 77 | 163 | 3.3 |
| Other (e.g. academics) | 13 | 27 | 40 | 0.8 |
| Total | 3,067 | 1,847 | 4,914 | 100 |

Inquiries by topic



| Type | Calls | Emails | Combined | Percent |
|---|--------------|--------------|--------------|------------|
| Registration support and details | 2,780 | 1,400 | 4,180 | 71.4 |
| Lobbying Act and regulations | 643 | 569 | 1,212 | 20.7 |
| Lobbyists' Code of Conduct | 23 | 108 | 131 | 2.2 |
| Other (mandate, allegations, outreach requests) | 102 | 226 | 328 | 5.6 |
| Total | 3,548 | 2,303 | 5,851 | 100 |

REGISTRATION AND CLIENT SERVICES SERVICE STANDARDS

In 2021-22, the Registration and Client Services team continued with its excellence in service standards, exceeding all targets when processing new registrations, responding to inquiries, and answering calls.

Service standards



| 2021-22 Service standards | Target | Result |
|---|--------|--------|
| Respond to simple email within 2 business days | 90% | 100% |
| Respond to complex emails within 10 business days | 85% | 99.5% |
| Respond to incoming telephone calls within 30 seconds | 80% | 82.75% |
| Review new registrations within 3 business days | 100% | 100% |
| Process voicemails within 1 business day | 85% | 99.5% |

SPOTLIGHT ON

IMPROVEMENTS TO THE REGISTRY OF LOBBYISTS

The information management and information technology team continued with its ongoing maintenance and improvements to the Registry of Lobbyists in 2021-22. This included a complete overhaul of the process to enter communication reports for registrants.

The new process not only increases speed and efficiency by reducing the number of steps in filing reports but also supports accuracy through an enhanced and intelligent auto-complete feature that helps lobbyists find and enter the correct names of designated public office holders.

Changes to the user interface in various sections of the registration entry process made it more user friendly and intuitive, while a more straightforward new password reset process allows registrants to regain access to their account more quickly. In addition, an upgraded search function helps to improve results and ensures users find the information they seek more efficiently.

The improvements also took mobile devices into account to deliver solutions that scale effectively on smartphones and tablets. Finally, although unseen to users, several improvements to the underlying system increased the security of the Registry of Lobbyists and the data it holds.

Late in the 2021-22 fiscal year, the team launched a Registry of Lobbyists user survey to gather data from visitors that would help improve the reporting tools and statistics available publicly.

This feedback will inform the development of new ways of presenting data and deliver more options for searching and sorting the information that the *Lobbying Act* requires registrants and lobbyists to file in the Registry of Lobbyists.

ENSURING COMPLIANCE

COMPLIANCE DIRECTORATE

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

The Compliance Directorate began 2021-22 with 24 ongoing files at the preliminary assessment stage of an investigation and initiated 22 during the year. Fourteen files were closed at the preliminary assessment stage and 1 investigation was pursued. At the beginning of this fiscal year, the Office carried forward 5 investigations from previous years. During the year, they were all finalized as indicated in the box below, including one where the Commissioner referred the matter to the Royal Canadian Mounted Police (RCMP) as she had reasonable grounds to believe an offense occurred under the *Lobbying Act*. As of March 31, 2022, 31 files were at the preliminary assessment stage while 1 was an ongoing investigation.

In addition to investigation efforts, the Office initiates compliance assessments to address late filings of registrations and late reporting of monthly communications. Follow-ups are conducted after one year of regular monitoring to ensure continued compliance. The number of compliance assessments increased from 72 in 2020-21 to 90 in 2021-22.

Compliance statistics

| Investigation activities | Description | Total |
|---|---|-----------|
| Preliminary assessments initiated | <ul style="list-style-type: none"> • 8 from external referrals • 14 from internal activities | 22 |
| Cases closed at the preliminary assessment stage | <ul style="list-style-type: none"> • 7 no evidence of registrable lobbying • 3 no evidence that 5-year prohibition contravened • 2 registration/reporting not required • 1 insufficient evidence of a breach under the Lobbyists' Code of Conduct • 1 no jurisdiction to investigate | 14 |
| Active investigations | | 1 |
| Investigations ceased | | 3 |
| Investigation reports tabled | <ul style="list-style-type: none"> • Mark Aldridge, president & CEO, MCAP Commercial LP | 1 |
| Suspended files | <ul style="list-style-type: none"> • 1 file referred to the RCMP in 2021-22 • 10 suspended files from previous years | 11 |

INVESTIGATION REPORT

Mark Aldridge, President and Chief Executive Officer of MCAP Commercial LP

Tabled in Parliament on June 10, 2021, the [investigation report on Mr. Mark Aldridge](#), president and chief executive officer of MCAP Commercial LP, examined communication between Mr. Robert Silver, senior vice-president of strategy, risk and policy for MCAP, and federal public office holders. This communication concerned MCAP's role in administering the Canada Emergency Commercial Rent Assistance program on behalf of the Government of Canada and the eligibility of limited partnerships to claim the Canada Emergency Wage Subsidy for their employees.

The Commissioner found that the amount of communication with federal public office holders during the period under investigation fell below the "significant part of duties threshold" and did not trigger a requirement to register; therefore, no breach of the *Lobbying Act* occurred.



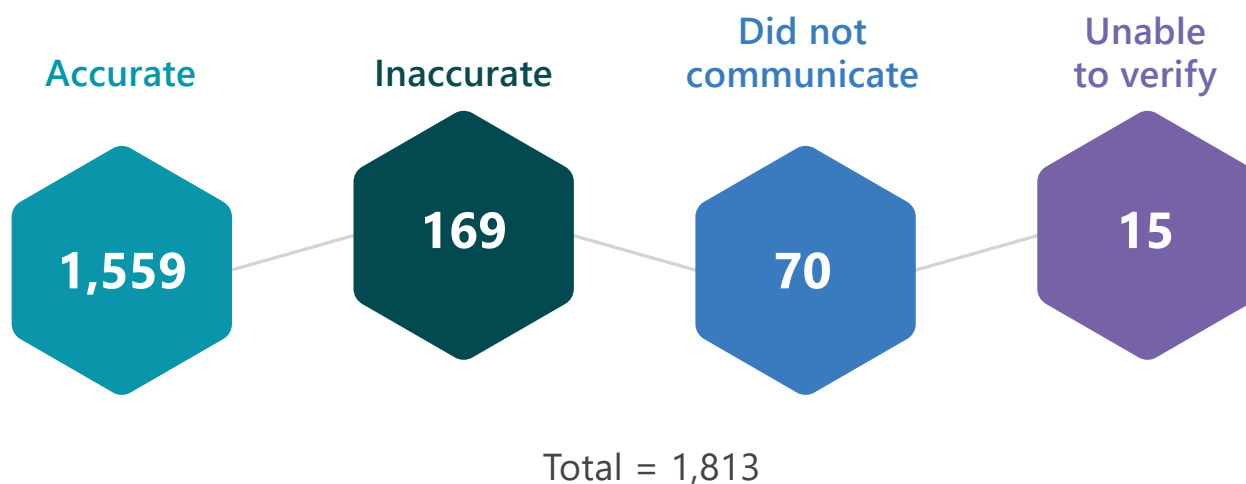
In the report, the Commissioner also reiterated the view from her "[Improving the Lobbying Act: Preliminary recommendations](#)" submitted to the Standing Committee on Access to Information, Privacy and Ethics that the "significant part of duties" registration threshold for in-house lobbyists in the *Lobbying Act* should be replaced by registration of in-house lobbying activities by default. This would ensure that a substantial volume of in-house lobbying activity does not go unreported in the Registry of Lobbyists.

COMMUNICATION REPORT VERIFICATION

In past years, the Office verified the accuracy and completeness of a 5% sampling of all communication reports submitted by lobbyists each month. In September 2021, the Office launched a six-month pilot project and increased the sampling of monthly communication reports verifications to 10%.

The goal of this pilot project was to determine if the proportion of accurate monthly communication reports would differ by increasing the sampling size. No significant difference was noticed in the accuracy rate. The Office decided to end the pilot project in March 2022 to focus on other compliance activities.

Communication report verifications



By the end of 2021-22, designated public office holders named in 1,813 communication reports reviewed the information and confirmed their completeness and accuracy. The verification confirmed that 1,559 reports or 86% as accurate.

Common inaccuracies in communication reports



EXEMPTION REQUESTS

In 2021-22, the Office received 6 applications for exemptions to the five-year prohibition on lobbying from former designated public office holders and 3 applications were carried over from the previous year.

Two were granted and 3 denied, while 2 were withdrawn. Two applications were carried over to 2022-23.

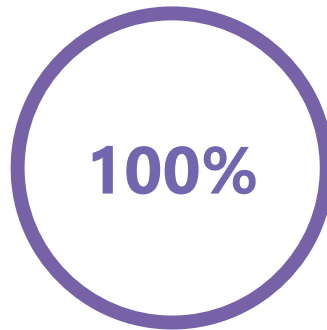
[All exemptions](#) are published online.

Exemption request service standards



A letter sent by the Commissioner within 60 days of receiving an accurately completed application to either grant or to obtain further representations.

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.

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.

SPOTLIGHT ON

THE JUDICIAL REVIEW OF REPORTS TO PARLIAMENT

On June 15, 2021, the Federal Court decided that Democracy Watch could proceed with two related judicial review applications challenging the Commissioner's interpretation and application of the *Lobbyists' Code of Conduct* in two investigation reports tabled in Parliament in March 2020.

In these Reports to Parliament — [Benjamin Bergen, Council of Canadian Innovators](#) and [Dana O'Born, Council of Canadian Innovators](#) — the Commissioner determined that neither Mr. Bergen nor Ms. O'Born contravened Rule 6 or Rule 9 of the *Lobbyists' Code of Conduct*.

Following the Court's decision, Democracy Watch requested that the Commissioner provide the Certified Tribunal Record in relation to its judicial review applications pursuant to Rule 317 of the Federal Courts Rules, which requires a "tribunal" — a category that includes the Commissioner of Lobbying — to produce all *relevant* material before it at the time of a decision under review. Before responding to the request, the Commissioner filed a motion with the Federal Court to obtain guidance as to how to reconcile her responsibility to comply with this request and her obligation under the *Lobbying Act* to conduct investigations in private.

On December 14, 2021, Justice Henry Brown issued an order protecting the confidentiality of the information that the Commissioner had obtained in conducting her investigations of Mr. Bergen and Ms. O'Born. Two aspects of Justice Brown's decision are worth highlighting.

First, it recognized the fundamental importance of the confidentiality requirements in the *Lobbying Act* to the proper functioning of the Commissioner's compliance and enforcement mandate and to maintaining trust and confidence in the Office's investigation process. Justice Brown also found that these confidentiality requirements continue after an investigation concludes and any associated report is tabled in Parliament. Justice Brown further emphasized that the exemption in the *Access to Information Act* that applies to information gathered in the course of conducting investigations under the *Lobbying Act* demonstrates that Parliament intended to create a federal lobbying regime that protects the confidentiality of such information.

Second, Justice Brown interpreted the scope of the information the Commissioner must include in a Certified Tribunal Record. In particular, he found that the Commissioner must produce the information *relevant* to establishing the grounds for any findings or conclusions set out in investigation reports. In doing so, Justice Brown underscored that a tribunal is not required to produce all material in its possession.

On January 24, 2022, the Commissioner produced the Certified Tribunal Record to the Court in accordance with the confidentiality order issued by Justice Brown.

At present, Democracy Watch and the Attorney General of Canada are in the process of perfecting their respective records so that the Court can decide the merits of Democracy Watch's judicial review application once a hearing date is ultimately set.

EXPANDING AWARENESS AND UNDERSTANDING

OUTREACH AND EDUCATION

The Office engages with stakeholders to foster awareness and understanding of their obligations under the *Lobbying Act* and the *Lobbyists' Code of Conduct*.

In 2021-22, the office met with 1,327 stakeholders through 83 presentations to lobbyists, public office holders, and other interested parties, such as universities and international organizations. This represented an increase of 42%.

Interactions with stakeholders



2020-21

› **933 stakeholders engaged**

63 presentations to lobbyists

15 presentations to public office holders

18 presentations to other interested parties



2021-22

› **1,327 stakeholders engaged** **↑ 42%**

54 presentations to lobbyists

13 presentations to public office holders

16 presentations to other interested parties

The Office also sent advisory letters to 49 potential lobbyists informing them of the *Lobbying Act's* registration requirements and 24 to former designated public office holders regarding the legislation's post-employment restrictions.

SPOTLIGHT ON THE LOBBYISTS' CODE OF CONDUCT CONSULTATION

The *Lobbyists' Code of Conduct* has been a key part of the federal lobbying regime since 1997. It exists to set standards of behaviour for lobbyists who must be listed in the Registry of Lobbyists in accordance with the *Lobbying Act*.

The *Lobbyists' Code of Conduct* is a non-statutory tool against which a lobbyist's conduct is assessed. By complying with the rules, lobbyists contribute to public confidence in the integrity of government institutions and federal decision-making. Non-compliance with any rule may result in an investigation by the Commissioner of Lobbying. This can lead to a public investigation report being tabled in Parliament.

While the *Lobbyists' Code of Conduct* was last updated in 2015, investigation reports of recent years and five years of application highlighted that further improvements are warranted. A 2020 preliminary consultation with stakeholders further supported that the *Lobbyists' Code of Conduct* could be enhanced.

Over the course of 2021-22, the Commissioner set about developing a draft update of the *Lobbyists' Code of Conduct* for further public consultation. In addition to considering comments received in 2020 and observations made in recent investigation reports, primary drafting objectives included:

- using clear and accessible language to support the understanding of and compliance with the rules
- placing a clear focus squarely on the actions of lobbyists, rather than subjectively analyzing whether an action has placed an official in a real or apparent conflict of interest
- recognizing that making grassroots appeals to the public is regulated communication under the *Lobbying Act*
- integrating key definitions and examples into the *Lobbyists' Code of Conduct* itself, rather than relying on separate guidance documents

On completion of a draft update of the *Lobbyists' Code of Conduct*, the Commissioner launched an online consultation that took place between December 2021 and February 2022.

During the consultation, 49 stakeholders shared comments and suggestions on the draft update. In addition, copies of 181 near-identical emails were received, containing views on the draft update of the *Lobbyists' Code of Conduct* that individuals sent to various government officials.

A thorough review of comments was ongoing in the final weeks of 2021-22 and will support the Commissioner in finalizing an update of the *Lobbyists' Code of Conduct* to support a final round of consultation in spring 2022.

Once finalized, a new version of the *Lobbyists' Code of Conduct* will be referred to the House of Commons Standing Committee on Access to Information, Privacy and Ethics and subsequently published in the Canada Gazette before coming into force. To help lobbyists transition to an updated *Lobbyists' Code of Conduct*, educational material will be created and shared to support understanding and compliance.

MEDIA ENGAGEMENT

The Office received 35 media inquiries in 2021-22, down significantly from the 102 in the previous fiscal year. About 23% concerned compliance activities, 14% inquired about the Registry of Lobbyists, and another 14% asked about the consultation on the *Lobbyists' Code of Conduct*.

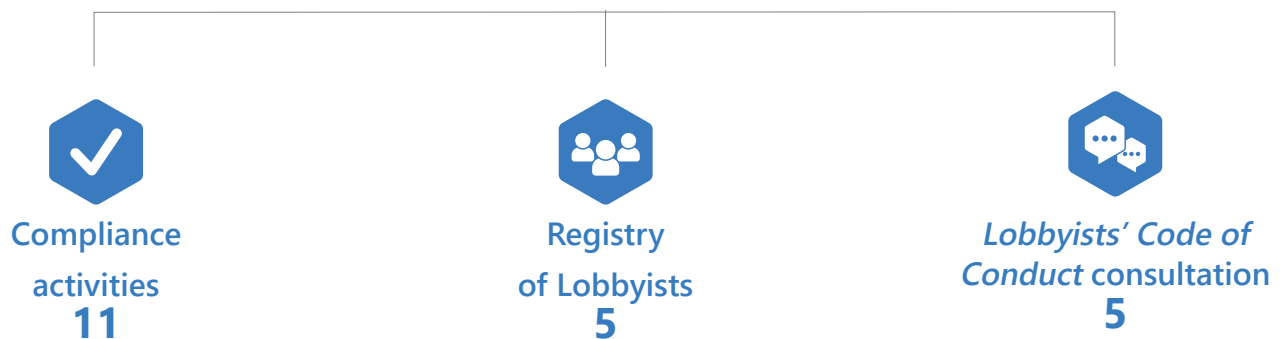
The Office granted 6 interviews to Canadian reporters.

35 media inquiries



6
media interviews

Top-3 subjects of inquiries



PARLIAMENTARY APPEARANCE

On May 14, 2021, the Commissioner also appeared before the House of Commons Standing Committee on Access to Information, Privacy and Ethics to discuss the Main Estimates and answer members' questions about Canada's lobbying legislation.

LOBBYING AND THE ELECTION

To help lobbyists comply with the *Lobbying Act's* registration and reporting requirements, the Office published information to clarify the status of elected officials and their staffs during an election period.

Status of Parliamentarians and their staff during a federal election

| Designated public office holder | Status during election campaign | Registration/ reporting required |
|---|---------------------------------|----------------------------------|
| Prime minister, minister, minister of state | Unchanged | ✓ |
| Ministerial staff who continue working in minister's office during the election | Unchanged | ✓ |
| Ministerial staff who leave their position to work on an election campaign | Not public office holders | ✗ |
| Members of the House of Commons (including parliamentary secretaries) | Not public office holders | ✗ |
| Staff of a member of the House of Commons | Not public office holders | ✗ |

PRE- AND POST-ELECTION OUTREACH TO MEMBERS OF PARLIAMENT AND THEIR STAFF

Following the results of the election, the Office engaged in outreach initiatives designed to help members of Parliament increase their awareness and understanding of the *Lobbying Act* and *Lobbyists' Code of Conduct*.

In February 2022, the Office teamed up with the Library of Parliament to offer information sessions to members of Parliament and their staff about Canada's lobbying framework. The audiences for both the English and French sessions comprised of members of Parliament and their staff and totaled 51 individuals. The Office also sent 43 letters outlining the five-year prohibition on lobbying that applies to former designated public office holders to those members of Parliament who did not seek re-election or who were not re-elected.

SPOTLIGHT ON

THE OFFICE'S ENHANCED INTERNATIONAL PRESENCE

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, an increasingly important issue around the world.

With webinars and virtual sessions prevailing once again in 2021-22, the Office continued to increase its international outreach activities, building on the activities of the previous year.

When the Organization for Economic Cooperation and Development (OECD) launched its report [Lobbying in the 21st Century: Transparency, Integrity and Access](#) in May 2021, the Commissioner participated in a panel on key trends and challenges associated with lobbying and how they can be addressed.

On the heels of the OECD report, international interest in discussions on the themes of transparency and accountability in international governance continued to grow. In June, the Commissioner was invited as a virtual guest speaker at the Leiden University Honours Conference in the Netherlands to share the Canadian experience. Shortly thereafter, she took part in a virtual session with the [High Authority for Transparency in Public Life](#) in France where she discussed the Canadian lobbying landscape along with trends and challenges and shared her recommendations for strengthening Canada's lobbying regime.

Similarly, the Office provided an overview of the Canadian lobbying regime at an OECD expert group meeting on preventing and combating misinformation and disinformation in July and, later in December, at the Working Party of Senior Public Integrity Officials, as they explored the renewal of the OECD's principles for transparency and integrity in lobbying.

The Office also took part in a session to discuss contextual, conceptual, operational, and technical challenges related to the implementation of the OECD recommendations related to a project entitled "Strengthening a culture of transparency and integrity in lobbying in Quebec." This session took place during a meeting of the [Lobbyists Registrars and Commissioners Network](#), a group of regulators responsible for enforcing federal, provincial, territorial, and municipal lobbying regimes in Canada.

In December, the Commissioner also provided an update on developments in the Canadian lobbying landscape at the Council on Governmental Ethics Laws Conference, which was held virtually in 2021. The Council on Governmental Ethics Laws is a U.S.-based professional organization for government regulators and others working in ethics, elections, freedom of information, lobbying, and campaign finance.

In addition to virtual presentations, the Office contributed to international collaborative efforts to build on common goals of transparency and accountability in the principles of lobbying registration and compliance. These support the development of open standards that, in turn, can strengthen democratic systems.

A healthy lobbying regime is one that supports public confidence in the integrity of government decision-making. Addressing international audiences about Canada's experience in regulating lobbying activities provides opportunities to share our expertise with international counterparts and helps to foster transparency and the ethical lobbying of decision makers at all levels.

WORKINGS OF THE OFFICE

The Office implemented the first year of its 2021-24 strategic and operational plan as identified in the Office’s Departmental Plan. The Office will report its progress in its 2021-22 Departmental Results Report in the upcoming fiscal year.

As happened last fiscal year, most employees predominantly teleworked in 2021-22 and the Office continued to find ways to encourage staff to connect and collaborate virtually. This included regular all-staff meetings, “fireside chats” where employees shared their expertise and projects with colleagues, and social events, such as virtual coffees.

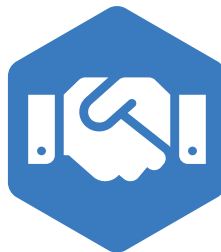
The absence of an annual Public Service Employment Survey in 2021 makes it difficult for the Office to report on its progress in maintaining an exceptional workplace; however, the Office endeavored to continue to maintain a healthy workplace with initiatives such as a LEAN exercise, mental health support and workshops, and diversity and inclusion awareness and training.

LEAN EXERCISE

A “LEAN” exercise with all staff members identified three focus areas: improving the quality of reports, memos, and documents; identifying collaboration opportunities early in all processes; and, enhancing document findability in the Office’s information management systems.



**Improving the quality
of reports, memos, and
documents**



**Identifying
collaboration
opportunities early in
all processes**



**Enhancing document
findability in the
Office’s information
management systems**

MENTAL HEALTH STRATEGY

Launched in the 2019-20 fiscal year, the Office's Mental Health Strategy continues to support employee health, safety, and well-being through collaboration, inclusiveness, respect, and continuous learning. The Office's Mental Health Committee organized four events in 2021-22 designed to raise awareness of mental health issues:

- Behaviors in conflict situation workshop from the Office of Informal Conflict Management
- Taking care of yourself presentation from the Office of the Ombuds for Mental Health and Well-Being
- Session on Mindfulness from the Office of the Ombuds for Mental Health and Well-Being
- Bell Let's Talk Presentation from Office of the Ombuds for Mental Health and Well-Being

Throughout the year, the Office encouraged staff to attend several workshops and information sessions from the Canadian Innovation Centre for Mental Health in the Workplace and Lifespeak. The Office also provided employees with resources to help them navigate through the difficulties related to the COVID-19 pandemic.

DIVERSITY AND INCLUSION

Following the signing of the Statement of Action against Systemic Racism, Bias and Discrimination in the Public Service by the Office's head of Human Resources in December 2020, the Commissioner outlined her action plan in a "[Letter on Implementation of the Call to Action on Anti-Racism, Equity and Inclusion in the Federal Public Service](#)" to the Clerk of the Privy Council in the summer of 2021.

The efforts toward ensuring a diverse and inclusive workforce included two mandatory training courses from the Canada School of the Public Service for all staff and managers also completed training on inclusive hiring practices.

Employees also attended two events in 2021-22 to help support diversity, inclusion, and awareness:

- "Being Black in Canada," a presentation by Marie Calixte-McKenzie and Jonathan Gohidé, two federal speakers for diversity and inclusion
- Blanket exercise to mark the Day of Truth and Reconciliation

SPOTLIGHT ON

STAFFING CHALLENGES FOLLOWING BUDGET 2021

After receiving a positive response in April's Budget 2021 to a request for additional funding to support the maintenance and enhancement of the Registry of Lobbyists and other systems, finding candidates to fill the new IM/IT positions proved more difficult than expected in light of the tight and competitive labour market. The Office staffed two of five positions in 2021-22. The Office will continue with its efforts to fill these roles into the 2022-23 fiscal year.

Although working in a small organization appeals to certain individuals, the limited opportunity for advancement serves as an impediment for some. Retaining talent is a challenge since career progression usually requires a move to a bigger department or agency. This is true for all areas of the organization.

This organizational reality continues to be a concern for senior management when it comes to hiring and retaining talent. To address the issue, the Office committed to encouraging and supporting all employees in their efforts to learn and develop new competencies, which will help to promote retention and increase job satisfaction. In order to deliver on this commitment, managers at all levels will explore ways to offer employees new experiences designed to nurture talent and expand skillsets.

LOOKING AHEAD

As we look to the year ahead, it is expected that it will be another busy one for the Office.

When it comes to the Registry of Lobbyists, we will analyze the data obtained from a user survey launched late in 2021-22 and will continue to develop new reporting tools and statistics in response to the results and stakeholder needs. In addition, we will continue to enhance the Registry of Lobbyists by making it more user-friendly for registrants as they report their lobbying activity.

We will pursue staffing actions to fill the remaining IM/IT positions created after the government's positive response to our request for additional funding. The Office will also explore other areas where additional funding would benefit the Office and help to improve our service to Canadians.

On the compliance front, the team will focus on completing the ongoing files and developing strategies to address late registration and communication reporting.

Outreach efforts will focus on the revised *Lobbyists' Code of Conduct* that is expected to come into force in 2022-23. The Office will work with all stakeholders to ensure they understand the updated rules with respect to transparency and ethical behaviour.

We will also finalize a comprehensive stakeholder engagement strategy to enhance awareness and understanding of the federal lobbying regime. This strategy will leverage analytics, registration data, and feedback from stakeholders to identify and prioritize key areas.

We remain ready to contribute to any future review of the *Lobbying Act*. We will also update the Commissioner's interpretation documents concerning the application and enforcement of the *Lobbying Act*.

As restrictions began to ease at the end of the fiscal year, the Office implemented a hybrid model that required all staff to work on site at least once per week beginning April 1, 2022. This approach will be re-evaluated in September.

We will continue to organize activities that encourage diversity and inclusion in the workplace and support initiatives that deliver on the Office's Mental Health Strategy. Career development will continue to be supported through training and mentorship opportunities focused on acquiring knowledge, skills and experience.

Canadians can continue to count on the Office's small, dedicated team of professionals to go above and beyond to help ensure that the Canadian population can have confidence that federal lobbying happens transparently and ethically.