April 2026

Special Committee to Review the Lobbyists Transparency Act

Second Session, 43rd Parliament

# REVIEW OF THE *LOBBYISTS TRANSPARENCY ACT*

LEGISLATIVE ASSEMBLY *of* BRITISH COLUMBIA

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of BRITISH COLUMBIA

April 22, 2026

To the Honourable the
Legislative Assembly of the
Province of British Columbia

Honourable Members:

I have the honour to present herewith the report of the Special Committee to Review the Lobbyists Transparency Act.

Respectfully submitted on behalf of the Committee,

Steve Morissette, MLA
Chair

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# Composition of the Committee

## Committee Members

*43rd Parliament, 1st Session*

Steve Morissette, MLA, Chair
Kootenay-Monashee

Rosalyn Bird MLA, Deputy Chair
Prince George-Valemount

Tara Armstrong, MLA (*Member from September 12, 2025*)
Kelowna-Lake Country-Coldstream

Susie Chant, MLA (*Member from May 26, 2025*)
North Vancouver-Seymour

Paul Choi, MLA (*Member to May 26, 2025*)
Burnaby South-Metrotown

Kiel Giddens, MLA
Prince George-Mackenzie

Janet Routledge, MLA *(Member from September 12, 2025*)
Burnaby North

Harwinder Sandhu, MLA
Vernon-Lumby

*43rd Parliament, 2nd Session*

Steve Morissette, MLA, Chair
Kootenay-Monashee

Kiel Giddens, MLA, Deputy Chair
Prince George-Mackenzie

George Anderson, MLA
Nanaimo-Lantzville

Rosalyn Bird, MLA
Prince George-Valemount

Harwinder Sandhu, MLA
Vernon-Lumby

## Committee Staff

Darryl Hol, Committee Clerk

Natalie Beaton, Committee Resesarch Analyst

Hanna Kim, Committee Researcher

Alexa Neufeld, Parliamentary Committees Officer

Emily Andrews, Committees Coordinator

# Terms of Reference

The Legislative Assembly agrees that a Special Committee to Review the Lobbyists Transparency Act be appointed to review the *Lobbyists Transparency Act* (S.B.C. 2001, c. 42), pursuant to section 11.1 of the Act.

That the Special Committee have the powers of a Select Standing Committee and in addition be empowered to:

a. appoint of its number one or more subcommittees and to refer to such subcommittees any of the matters referred to the Special Committee and to delegate to the subcommittees all or any of its powers except the power to report directly to the House;

b. sit during a period in which the House is adjourned, during the recess after prorogation until the next following Session and during any sitting of the House;

c. conduct consultations by any means the Special Committee considers appropriate;

d. adjourn from place to place as may be convenient; and,

e. retain personnel as required to assist the Special Committee.

That any information and materials previously under consideration by the Special Committee appointed by order of the Legislative Assembly on April 30, 2025, for the same purpose be referred to the Special Committee.

That the Special Committee report to the House by April 29, 2026; and that during a period of adjournment, the Special Committee deposit its reports with the Clerk of the Legislative Assembly, and upon resumption of the sittings of the House, or in the next following Session, as the case may be, the Chair present all reports to the House.

# Executive Summary

The *Lobbyists Transparency Act* (the Act) regulates lobbying activities in British Columbia. It requires lobbyists—whether individuals or organizations—to register their lobbying efforts in an online registry accessible to the public. The Act designates the Information and Privacy Commissioner as the Registrar of Lobbyists and establishes restrictions such as prohibitions on certain lobbying activities, gift-giving to public office holders, and lobbying by former public office holders for two years following their employment.

The Special Committee to Review the Lobbyists Transparency Act (the Committee) was appointed pursuant to section 11.1 of the Act, which requires a special committee to review the Act at least once every five years. This is the first review of the Act since it was amended in 2018. To inform its work, the Committee received briefings from the Ministry of Attorney General and the Office of the Registrar of Lobbyists, and conducted a public consultation. In total, 30 organizations and individuals participated in the Committee's review.

The Committee makes 24 recommendations intended to reduce administrative workload while maintaining transparency and simplifying reporting requirements to encourage democratic participation. The report begins with a description of the Committee's work and an overview of the Act. Subsequent chapters are organized by key theme and include a summary of input received, a description of the Committee's deliberations and reflections, and a list of recommendations that pertain to that theme.

During its review, the Committee noted the common misconceptions surrounding lobbying and acknowledged the important and legitimate role of lobbying in democratic societies, which allows individuals and groups to share expertise and input with public office holders, and to connect with the policy-making process. The Committee emphasized the important role of the Act's requirements in promoting transparency and public awareness of lobbying in the province. Committee Members also reflected on input regarding the chilling effect in lobbying, which arises when vague or complex rules and requirements discourage individuals and organizations from engaging with public office holders due to concerns about inadvertent non compliance, administrative workload, or potential penalties.

Members acknowledged that the Act has contributed to this effect for some organizations and explored options to reduce the compliance burden without undermining the Act's transparency objectives. To support organizations that engage in lobbying infrequently, Members recommend amending the Act so that an individual is not considered an in-house lobbyist if their lobbying activities total fewer than 50 hours in a calendar year, regardless of the size or purpose of the organization. Members further propose extending the registration deadline for in-house lobbyists from 10 days to 60 days. Members also propose replacing the requirement to report each individual lobbying activity with summary reporting on the number and subject areas of lobbying. Finally, Members suggest consolidating funding and monthly returns into a single quarterly return, and limiting the requirement to report funding to instances where the funding received is related to lobbying activities.

One area of focus concerned the powers and responsibilities of the Registrar of Lobbyists under the Act. The Committee highlighted the vital role that the Office of the Registrar of Lobbyists plays in ensuring the transparency of lobbying activities and thereby supporting the public's trust in democracy. Members noted that they heard from many organizations that the Act creates confusion and necessitates extensive guidance materials. To address this, the Committee recognizes the benefits of granting the Registrar authority to issue advisory opinions and interpretive bulletins regarding the interpretation and application of the Act. Members noted that this authority could improve understanding of the Act's requirements and help prevent noncompliance. Members also emphasize the importance of ensuring that the Lobbying Registry and accompanying guidance materials are accessible and user-friendly. Similarly, the Committee acknowledges the benefits of the Ministry of Attorney General consulting with the Registrar of Lobbyists prior to introducing legislative or regulatory amendments to the Act.

Another area of discussion was the Act's rules and requirements related to gift-giving. Committee Members emphasized the importance of ensuring that gift-giving prohibitions do not unduly limit interactions between public office holders and organizations or causes. Accordingly, the Committee recommends amending the gift-giving prohibition to exclude costs related to hospitality, including hospitality provided in common with other attendees at official meetings or conferences. The Committee noted that the Act may be limiting public office holders' ability to support community events and charitable functions, and suggests that exempting the fees associated with complimentary tickets for community and charitable events from the gift-giving prohibition could enable greater participation by public office holders. The Committee also identifies opportunities to improve clarity and reduce administrative workload by amending the Act to calculate the gift-giving prohibition on a calendar year basis rather than a rolling 12-month period, and to require gifts to be reported to the Registrar of Lobbyists only once they are given to a public office holder, rather than when they are both promised and given. Finally, to further address workload concerns and harmonize with other reporting timelines, the Committee proposes changing the reporting frequency for gifts given to public office holders from monthly to quarterly.

The Committee acknowledged the need to consider the implications of the Act on different organizations, particularly small organizations. Members recognized the need for transparency of lobbying activities but noted the need to ensure charities and non-profit organizations are not spending significant time on lobbying registration and reporting rather than their primary objectives. Additionally, Committee Members noted that highly regulated industries, such as utilities, already operate within robust regulatory frameworks that adequately address transparency concerns. Members agreed on the importance of avoiding duplication of existing transparency processes. Therefore, Members recommend narrowing the Act's definition of "lobby" to contracts for goods or services and amending the Act to exclude certain submissions related to routine business contracts of Provincial entities, including submissions concerning contracts subject to public approval processes.

The Committee also considered opportunities to improve the level of transparency in lobbying reporting. Members discussed the importance of lobbying regulations in ensuring the public is informed about how government decisions are influenced and who has access to public office holders. To further enhance transparency, Committee Members agree that lobbying activity reports should include the types of communications used when lobbying a public office holder.

During its deliberations, the Committee identified opportunities to amend definitions and requirements within the Act. Members recommend amending the definition of "designated filer" to ensure that the filer is the individual with the most knowledge of an organization's lobbying activities. In addition, to address uncertainty surrounding the definition of "Provincial entity," Members recommend amending the Lobbyists Transparency Regulation to establish a schedule of Provincial entities applicable to section 3(a) of the Regulation. Members emphasize the importance of ensuring that the legislation is accessible and easy to understand.

Finally, the Committee underscores the importance of the provincial government consulting with federal and provincial jurisdictions to explore opportunities to harmonize lobbying legislation. Members highlight that greater consistency in lobbying rules would reduce administrative burden and confusion related to lobbying reporting requirements, which may otherwise contribute to inadvertent non compliance or discourage individuals and organizations from engaging with public office holders.

# The Work of the Committee

On April 30, 2025, the Legislative Assembly appointed a special committee to review the *Lobbyists Transparency Act*, pursuant to section 11.1 of the Act. The Committee was reappointed for the second session of the 43rd Parliament on February 19, 2026.

## Committee Process

The Committee received briefings from the Ministry of Attorney General and the Office of the Registrar of Lobbyists on July 9, 2025. The Ministry provided the Committee with background information on the development, scope, objectives and statutory functions of the Act, and past legislative amendments. The Office of the Registrar of Lobbyists outlined its role in the administration of the Registry, conducting public education to promote awareness for the Act, and enforcing the Act.

As part of its review, the Committee accepted written submissions between July 21 and September 19, 2025. The Committee reviewed all input received and invited select participants to public hearings on December 5 and December 10, 2025. In total, 30 participants contributed to the Committee's work. A list of participants is provided in the Appendix. The Committee carefully considered all input received during its deliberations to inform its recommendations.

## Meeting Schedule

### 1st Session, 43rd Parliament

May 1, 2025
- Election of Chair and Deputy Chair

May 14, 2025
- Planning

July 9, 2025
- Briefings
- Planning

October 29, 2025
- Planning

December 5, 2025
- Public Hearing

December 10, 2025
- Public Hearing

February 10, 2026
- Deliberations

### 2nd Session, 43rd Parliament

March 6, 2026
- Election of Chair and Deputy Chair
- Deliberations

April 1, 2026
- Deliberations

April 16, 2026
- Deliberations
- Adoption of Report

# Overview of the Act

The *Lobbyists Transparency Act* (the Act) regulates lobbying activities in British Columbia. The Act requires individuals and organizations that engage in lobbying activities and meet specific criteria to register their efforts in an online public registry, ensuring transparency for the public. Under the Act, lobbyists are individuals who, on behalf of their employers or clients, communicate with public office holders in an attempt to influence their decisions. The Act's definition of public office holder includes a Member of the Legislative Assembly, an employee of government, and an employee of Crown corporations, universities, health authorities, and other Provincial entities. The Act sets out restrictions, including prohibitions on certain lobbying activities and gift-giving to public office holders. The Act also establishes the Registrar of Lobbyists, which is an independent officer of the legislature mandated to oversee, monitor, and enforce the Act.

## *Lobbyists Registration Act*

The first legislation governing lobbying in British Columbia was introduced in 2001 through the *Lobbyists Registration Act*. This Act established the Registrar of Lobbyists and required lobbyists to submit information to the Registrar about their business activities, what subject matters on which they lobbied, and public office holders or government institutions they lobbied.

In 2010, amendments to the Act expanded the Registrar's mandate to include public education about the Act and granted the authority to investigate and issue monetary penalties for contraventions of the Act. These amendments also introduced the online Lobbyists Registry to improve public access to information about lobbying activities. Further amendments were introduced in 2018, including a two-year "cooling-off period," which prohibited former public office holders from lobbying for two years after leaving office.

## *Lobbyists Transparency Act*

On May 4, 2020, amendments came into effect that renamed the *Lobbyists Registration Act* as the *Lobbyists Transparency Act*. In addition to the name change, these amendments introduced new rules on gift-giving and required lobbyists to provide additional details about their activities through a monthly return. The changes eliminated the requirement that in-house lobbyists meet a 100-hour lobbying threshold before registering, harmonizing registration requirements for consultants and in-house lobbyists.

The Act was further amended in 2024. The amendments included eased requirements for reporting requested and received funding from government, government agencies, and Provincial entities by eliminating the requirement to report funding requests, and reducing the frequency of disclosures of funding received from monthly to quarterly. The amendments also clarified reporting requirements for lobbyists and organizations that work together with other entities for the purpose of lobbying, and the information that must be filed when a consultant lobbyist or organization ceases lobbying.

## Statutory Review

Section 11.1 of the Act stipulates that, at least once every 5 years, a special committee of the Legislative Assembly must begin a comprehensive review of the Act and submit a report to the Legislative Assembly within one year of its appointment. Per section 11.1(3), the first five-year period began on the date the section came into force in May 2020. This is the first review of the Act.

# Interpretation and Application

## Definitions

The definition of "lobby" is set out in section 1(1) of the Act and includes communicating or arranging a meeting with a public office holder aimed at influencing legislation, regulations, government programs or policies, government funding or contracts, decisions to transfer Crown assets, or decisions to shift services from the public to the private sector. The Business Council of British Columbia noted that the Act's definition of "lobby" is overly broad, requiring the reporting of many routine interactions with government officials. The Council recommended narrowing the definition to explicitly exclude activities including routine correspondence, broad discussions of general policy, and the provision of independent research, economic data, and expert analysis for public benefit.

One individual noted that the Act fails to recognize lobbies as distinct entities, allowing organizations that function as lobbies to operate without clear scrutiny. They further noted that the Act's focus on "lobbyist" places emphasis on individuals rather than organizations, overlooking organizational-level accountability, including in situations involving potential conflicts of interest. They proposed expanding the definition of "lobby" to capture organizations functioning as lobbies, including non-public organizations whose services or stated purposes involve influencing elected or appointed public officials, and that are not public bodies or registered charities. They also recommended adding a definition for "lobbying organization" to the Act, as well as introducing two additional categories of lobbyists: paid lobbyists (employees and paid board members), and unpaid lobbyists (volunteers).

The Committee heard concerns regarding the definition of "designated filer." A designated filer is defined in the Act as either a consultant lobbyist or, in the case of an organization with an in-house lobbyist, the most senior officer of the organization who receives payment for performing the officer's functions. If the organization has no senior officer who receives payment, then the designated filer is the most senior in-house lobbyist. The Canadian Federation of Independent Business (CFIB) recommended amending the definition to allow a person to be appointed the designated filer by the most senior officer of the organization. They stated that amending the definition in this way would better reflect the structure and accountabilities of national organizations with independent provincial offices and avoid situations in which a senior officer based in a different province and time zone must approve all filings.

## Application to Certain Organizations

Section 1(4) of the Act provides that an individual working for an organization with fewer than six employees is considered an in-house lobbyist only if they exceed 50 hours of lobbying within a 12 month period. For organizations with more than six employees, there is no minimum threshold, meaning any amount of lobbying activity qualifies an individual as an in-house lobbyist. Several organizations recommended amending section 1(4) so that an individual is not considered an in-house lobbyist if their lobbying activities total fewer than 50 hours in a preceding 12-month period, regardless of the size of the organization. Some organizations suggested this would relieve smaller organizations of the effort and expense associated with registration and monthly reporting, while also reducing the risk of accidental non-compliance. The Insurance Brokers Association of BC stated that applying the 50-hour threshold before requiring registration to all organizations would exempt organizations that engage in lobbying only infrequently. The Confederation of University Faculty Associations BC (CUFA BC) added that this amendment would allow the Registrar of Lobbyists to focus on organizations engaged in substantial and sustained government relations, rather than occasional or low-impact activities.

The Committee further heard that the exemption for in-house lobbyists of organizations with fewer than six employees is too restrictive. Many noted that organizations just above this threshold still have limited capacity and may be discouraged from advocacy due to complex rules and the risk of penalties. The BC Real Estate Association recommended amending the Act so that employees, directors, and officers of organizations with fewer than 20 employees are not considered in-house lobbyists. The Association stated that smaller organizations and non-profits do not have the resources to navigate the detailed lobbying registration requirements and may unintentionally not comply due to limited understanding or capacity.

The BC Federation of Labour noted that individuals who work for unions, labour organizations, and advocacy groups cannot qualify for an exemption from being considered an in-house lobbyist, as the Act states that the exemption does not apply to organizations whose primary purpose is to represent the interests of its members, or to promote or oppose issues. The Federation recommended amending section 1(4) of the Act so that an individual is not considered an in-house lobbyist if their lobbying activities total fewer than 50 hours in a preceding 12-month period, regardless of whether the primary purpose of the organization is to represent the interests of its members, or to promote or oppose issues.

Many charities and non-profit organizations highlighted that the Act's requirements impacted their ability to engage with public office holders and increased their workload significantly. The Canadian Cancer Society stated that the Act's reporting requirements demand significant time and resources, limiting its ability to carry out its charitable mission more effectively. In particular, the Committee heard that the Act should distinguish between different types of lobbying organizations, particularly with respect to registration and reporting requirements. The BC Federation of Labour noted that public-interest lobbying by non-profit organizations differs from commercial lobbying, as it often benefits broader societal concerns, while the Capilano Students' Union stated that the most significant flaw in the Act is its failure to distinguish between advocacy and lobbying. They recommended amending the Act to distinguish between public-interest advocacy and lobbying for commercial gain. Similarly, LandlordBC stated that its work should not be considered lobbying, as it works in the public interest and is a non-partisan organization that does not lobby for government funding. CUFA BC suggested that smaller organizations contribute diverse voices to public policy and should be supported. The organization recommended scaling compliance expectations based on organizational capacity, applying higher requirements to larger organizations while easing requirements for small, volunteer-based, or low-capacity non-profits. Additionally, the BC Real Estate Association suggested introducing streamlined registration processes or establishing a "low-impact lobbyist" designation for small organizations. In response to these suggestions, the Registrar of Lobbyists cautioned that introducing tiers or value-based judgments with respect to what constitutes lobbying activities could compromise the Act's neutrality and transparency objectives.

## Provincial Entities

The Registrar of Lobbyists noted that lobbyists find it challenging to determine whether the public bodies they interact with qualify as "Provincial entities" under the Act. Section 3 of the Lobbyists Transparency Regulation prescribes two groups of Provincial entities for the purposes of the definition of "Provincial entity" in section 1(1) of the Act. In section 3(a) of the Regulation, "Provincial entity" is defined as the Workers' Compensation Board and all entities included in the government reporting entity under the *Budget Transparency and Accountability Act*, except for the government itself as reported through the consolidated revenue fund. This definition is used to determine whether lobbying directed at a particular entity must be reported in the Lobbyists Registry, to assess whether an individual being lobbied qualifies as a "senior public office holder," and to identify whether a client or organization has received reportable government funding. Section 3(b) of the Regulation defines "Provincial entity" as the Provincial entities listed in the Appendix of the Regulation. This Appendix is used by current and former public office holders to assess whether an individual is exempt from the definition of "in-house lobbyist" and whether a person is subject to the "former public office holder" prohibition. The Registrar noted that the definition relied upon for section 3(a) of the Regulation is broader than the one used for section 3(b), and that creating a single table for both sections would either inappropriately narrow the scope of section 3(a) or inappropriately broaden the scope of section 3(b). To address this, the Registrar recommended establishing and maintaining a schedule of Provincial entities that is applicable for section 3(a) of the Regulation.

## Commercial Activities

FortisBC highlighted that private sector companies face significant uncertainty when navigating the Act in relation to their dealings with Crown corporations such as BC Hydro. The definition of "lobby" includes any communication with a public office holder in an attempt to influence the awarding, amendment or termination of any contract, grant or financial benefit by or on behalf of the Government of British Columbia or a Provincial entity. FortisBC emphasized that many of its interactions with BC Hydro and other Provincial entities arise from operational requirements—not attempts to influence public policy—including coordinating on new power sources, jointly operating infrastructure, negotiating commercial agreements, or developing energy efficiency programs. Specifically, FortisBC recommended amending the wording in the definition of "lobby" to refer to a "contract for goods or services", instead of a "contract," which would be consistent with terminology used in the Office of the Registrar of Lobbyists' guidance documents.

FortisBC also highlighted that where a contract needs formal approval in a public hearing by an official body or a person with legal authority, communications related to that contract should not be considered lobbying under the Act because they are already publicly available. Therefore, FortisBC recommended exempting from the requirements of the Act submissions relating to any contract that is or will be subject to approval in a proceeding that is a matter of public record by a body or person having jurisdiction or powers conferred under an Act. FortisBC also recommended expanding the restrictions on the application of the Act to include submissions made to a Provincial entity operating a business, where the submission relates to the negotiation, renegotiation, renewal, amendment, extension, termination or implementation of any contract or other agreement that the Provincial entity enters in the ordinary course of its business.

## Jurisdictional Alignment

The Committee heard about the need to coordinate with other jurisdictions' lobbying requirements. The Public Affairs Association of BC noted that many of its members lobby in multiple provinces, each with distinct legislative requirements that can be difficult to navigate and that greater consistency would benefit both lobbyists and public office holders. The Association recommended consulting with federal and provincial jurisdictions to explore opportunities for harmonizing lobbying regulations, similar to existing efforts in trade and labour mobility.

## Plain Language

The Committee also heard that the language of the Act makes it difficult to understand. ACEC British Columbia noted the need to revise and clarify the Act, including changes to its language. They noted that this would reduce administrative burden, simplify the rules, and increase transparency and compliance while preserving engagement. They recommended introducing a guiding principle of accessibility and the use of plain language in the legislation to support broader compliance.

## Committee Discussion

To begin its discussions, the Committee acknowledged that public misconceptions about lobbying persist and emphasized the legitimate role lobbying plays in supporting democratic participation, including by enabling public office holders to hear from a diverse range of individuals and groups. Members further emphasized the importance of the Act providing sufficient clarity so that the public, public office holders, and lobbyists share a common understanding of what lobbying is and how it can be done in a transparent way.

The Committee noted that it received extensive input—particularly from small organizations—regarding the administrative workload required by the Act. Members supported ways to reduce this workload for organizations that do not frequently engage in lobbying, without undermining the Act's transparency objectives, including by extending the 50-hour threshold exemption for requiring registration as an in-house lobbyist to all organizations, regardless of size. The Committee acknowledged that in some other jurisdictions, including Ontario, the 50-hour threshold does not include time spent preparing communications and materials, and agreed that a similar approach would be appropriate for the province. Members further discussed the need for greater consistency across lobbying rules, including by applying the 50-hour threshold to all organizations regardless of the purpose of the organization.

Committee Members discussed the importance of ensuring that the person responsible for filing returns at an organization that has an in-house lobbyist has direct knowledge of the relevant activities. The Committee agreed this may not always be the case under the current definition of "designated filer," particularly for national organizations. The Committee further acknowledged the input received from the Registrar of Lobbyists regarding the numerous questions about distinguishing between the two definitions of "Provincial entity," noting that a schedule currently exists for only one of these definitions. Members agreed that providing a schedule of Provincial entities for each definition would simplify understanding of the Act, reduce confusion, and limit the need for guidance documents.

Committee Members noted that highly regulated industries, such as utilities, already operate under regulatory frameworks that address transparency concerns, such as agreements subject to BC Utilities Commission review and approval. Members discussed the extensive communication between organizations such as FortisBC and BC Hydro that the Act is not meant to address, and agreed on the importance of avoiding duplication of existing transparency processes. Related to business operations, the Committee supported aligning the Act's language with the Office of the Registrar of Lobbyists' guidance documents, particularly regarding the use of the term "contract" in the Act's definition of "lobby."

Lastly, Members noted that seeking areas to further harmonize BC's lobbying requirements with other jurisdictions would simplify processes and improve understanding, particularly for national organizations. In addition, Committee Members discussed the importance of identifying opportunities to clarify the Act in order to increase accessibility, support broader compliance, and encourage participation. Members noted that greater clarity could also reduce the need for extensive guidance documents.

*The Special Committee to Review the Lobbyists Transparency Act recommends to the Legislative Assembly that:*

1. The Act be amended to not consider an individual an in-house lobbyist if their lobbying activities total fewer than 50 hours within a calendar year, excluding preparation time, regardless of the size of the organization.

2. The Act be amended to require that in-house lobbyists employed by organizations whose primary purpose is to represent the interests of their members, or to promote or oppose issues, be subject to the same 50-hour lobbying registration threshold as other organizations.

3. The definition of “designated filer” in the Act be amended to include a person appointed by the most senior officer of the organization.

4. The Lobbyists Transparency Regulation be amended to establish a schedule of Provincial entities that is applicable for section 3(a) of the Regulation.

5. The Act be amended to expand the restrictions on its application to include oral and written submissions made to a Provincial entity that operates a business where the submission relates to the negotiation, renegotiation, renewal, amendment, extension, termination or implementation of any contract or other agreement into which the Provincial entity enters in the ordinary course of its business.

6. The Act be amended to expand the restrictions on its application to include oral or written submissions made in respect of any contract that is or will be subject to approval in a proceeding that is a matter of public record by a body or person having jurisdiction or powers conferred under an Act.

7. The definition of “lobby” in the Act be amended to refer to “contract for goods or services” where it currently refers to “contract”.

8. The provincial government consult with federal and other provincial jurisdictions to explore opportunities to harmonize lobbying legislation.

# Filing Returns

## Deadline for Registration

Section 3 of the Act requires consultant lobbyists and organizations with in-house lobbyists to submit a registration return within 10 calendar days of beginning or resuming lobbying. The Committee heard that this requirement is uniquely short in Canada and is often difficult for organizations with limited administrative capacity to meet. The Insurance Brokers Association of BC and the BC College of Family Physicians noted that many charities, non-profit organizations, and professional associations have limited administrative resources, and that the current requirements create a disproportionate burden on those organizations. These organizations, as well as the BC Non-Profit and Charity Coalition, recommended extending the 10-day deadline to provide organizations with more time to complete the registration process.

## Monthly Return Filing Frequency

The Committee heard concerns about the workload created by monthly return filing requirements. Monthly returns include updates to registration returns and lobbying activity reports, which must be filed at the end of each month if lobbying occurred. The BC College of Family Physicians stated that for many charities, non-profits, and professional associations the current requirements of the Act, especially monthly reporting and interaction logging, create significant workload. The College stated that the Act could be modernized in ways that preserve transparency without compromising the ability of small organizations to participate meaningfully in advocacy work. ACEC British Columbia explained that shifting to a quarterly reporting schedule would ease this administrative burden and align the province with other jurisdictions while maintaining transparency. Similarly, the Business Council of British Columbia suggested establishing a reduced monthly return filing frequency for non-profit associations, charities, and academic or research organizations. The World Sikh Organization of Canada also proposed introducing proportional compliance measures for small charities and grassroots non-profits.

## Lobbying Activity Reports

As part of the monthly return reporting obligations, designated filers are required to submit a separate lobbying activity report for each lobbying activity in which a public office holder was lobbied. The BC College of Family Physicians recommended replacing reporting for each individual lobbying activity with summary reporting of the number and general topics of engagements with public office holders. The organization stated that requiring summary reporting of the number of times an organization engaged with a specific public office holder and the topics covered during those meetings, rather than separately logging every interaction, would be less onerous and still provide transparency.

## Communications

According to the Office of the Registrar of Lobbyists' guidance documents, communicating directly with a public office holder includes all forms of communication, such as in person interactions, phone calls, emails, letters, text messages, faxes, and social media. These communications are reportable where they are undertaken in an attempt to influence any of the matters set out in the Act's definition of "lobby."

The Vancouver Foundation stated that it supports regular reporting of direct communications with public office holders. However, it noted that BC's current requirements create a significant administrative burden for non profits with already limited resources, including collecting this information, assessing whether it is reportable, and filing monthly reports. The BC Federation of Labour noted that this results in all minor interactions being reported, while substantive meetings are obscured by a high volume of entries. Rather than reporting all types of communications, the Vancouver Foundation, Vantage Point, and United Way British Columbia advocated for simplifying the process by requiring only pre-arranged meetings with public office holders to be reported, aligning with the federal legislation which only requires oral and arranged meetings to be reported. They noted this would preserve transparency while reducing the administrative workload faced by non-profit organizations. Similarly, CUFA BC suggested exempting routine or low-impact communications—such as social media posts, participation in open consultations, and one-off informational emails—from reporting requirements. Lastly, the Capilano Students' Union suggested narrowing the scope to focus on substantive attempts to influence legislation that would maintain meaningful transparency and enhance public credibility.

With respect to social media posts, many organizations highlighted that reporting social media posts is time-consuming and redundant, asserting that such reporting fails to contribute to any new information that enhances transparency or accountability as these posts are already public. MS Canada noted that after one fundraising event, their team needs to spend an entire day tracking every interaction on social media for any MLA who may have posted about the event. Therefore, organizations recommended that social media posts be exempted from reporting requirements. In response to these concerns, the Registrar of Lobbyists emphasized that only social media posts directed at public office holders, where the content of the post also meets the definition of "lobby," are required to be reported.

The Registrar of Lobbyists further noted that designated filers are not currently required to disclose the types of communications used in lobbying activity reports and recommended amending the reporting requirements to include this information. The Registrar shared that they have heard from lobbyists that adding this requirement would provide the public with a more complete picture of which organizations and lobbyists are getting face-to-face meetings with public office holders, and which are lobbying via channels that may not carry as much influence, such as social media.

## Meetings

The Act includes arranging a meeting between a public office holder and any other individual, where the purpose of the meeting is to lobby the public office holder, as a lobbying activity that must be reported. CUFA BC and the Capilano Students' Union advocated for eliminating the requirement to report communications arranging meetings. The Students' Union shared that the reporting requirements for arranging meetings with public office holders create unnecessary duplication, as organizations must submit two identical reports: one when the meeting is arranged and another after it occurs. They noted that this doubles the administrative workload for a single activity, diverting time and resources from student services while offering minimal public benefit. The Students' Union also suggested shifting the onus of monthly return reporting by requiring public office holders to report meetings with student unions and other small non-profit organizations. They argued that requiring public office holders to log and disclose their meetings with student unions and other non-profit organizations would preserve transparency while easing the administrative burden on small organizations. In addition, CFIB recommended clarifying that in-house lobbyists only need to report meeting arrangements with individuals outside their organization, and not internal coordination. The organization noted the phrase "someone other than, or in addition to, yourself" in the Office of the Registrar of Lobbyists' guidance on reporting meetings is ambiguous for in-house teams, potentially leading to over-reporting.

## Gifts

The Act requires that lobbyists disclose any gifts that they have given or have been promised to be given to a public office holder. To reduce the administrative workload, the Insurance Brokers Association of BC recommended amending the Act to require quarterly reporting of gifts, rather than monthly. Additionally, the Association, along with the BC College of Family Physicians, recommended amending the Act to require reporting of gifts only when they have been given.

## Funding Returns

The Act requires designated filers to submit a funding return within 15 days after the end of a 3-month period if their organization or client receives funding from any Canadian or foreign government, including from any municipal, provincial, territorial, regional, or state government. The Vancouver Foundation and Vantage Point raised concerns about BC's rolling 3-month deadline for reporting government funding, noting it is difficult for smaller non-profits to manage alongside existing financial cycles. Several organizations, including ACEC British Columbia and CFIB, recommended revising the funding return filing requirement to every six months. The Vancouver Foundation and Vantage Point suggested revising the funding return filing requirement to once a year. In contrast, one individual expressed concern about recent amendments to remove requirements to report requests for government funding and to reduce the frequency of reporting funding.

The Capilano Students' Union shared that routine program funding and grants for non-profits should not require the same reporting obligations as funds tied to lobbying activities. The Students' Union recommended requiring the disclosure of funding only where the information is directly relevant to potential influence on government decision making. The Registrar of Lobbyists supported limiting disclosure to government funding directly tied to lobbying activities and acknowledged that the requirement to disclose unrelated funding undermines transparency.

The Public Affairs Association of BC noted that charities conduct more fundraising than other organizations and have fewer resources for administrative tasks. The Association argued that the limited public benefit of the requirement to report the receipt of public funding by charities does not outweigh the harm caused by their need to divert resources received from donors to cover the administrative costs of tracking and reporting requirements under the Act. The Association recommended exempting organizations designated as charitable for tax purposes by the Canada Revenue Agency from the requirement to report funding received from any government, government agency, or Provincial entity.

As a national organization, the Canadian Cancer Society highlighted that the majority of the funding it is required to report comes from jurisdictions outside of BC and relates to programs and services delivered outside the province, with no direct impact on BC. The Canadian Cancer Society and MS Canada explained that BC's requirement to report all government funding—including funding received from outside the province—creates a significant administrative burden. The organizations recommended amending the Act to only require disclosure of funding received from BC government entities. In response, the Registrar of Lobbyists stated that a benefit of requiring the disclosure of government funding received from outside of the province is that it helps identify situations in which non-BC or foreign governments may seek to indirectly influence BC public policy by funding lobbying activities in the province.

## Disclosure of External Organizations

The Registrar of Lobbyists advocated for requiring designated filers to disclose whether any board members of their organization hold employment, memberships, or interests with external organizations that have a direct stake in their lobbying activity, in order to provide the public with a fuller understanding of the true beneficiaries. The Registrar stated that this would address situations where businesses with shared interests create a separate organization to lobby on their behalf, and gave the example of an organization that engages in lobbying which has a board that is comprised of representatives from a number of founding businesses. The Registrar added that, although this structure is a legitimate and efficient way for multiple organizations to advance shared interests, it creates a transparency gap under the Act. The Registrar emphasized that this additional disclosure would help address situations in which businesses with aligned interests establish a separate entity to lobby on their behalf.

## Committee Discussion

Members reflected on input the Committee received sharing that the short deadline to register as an in-house lobbyist is difficult for smaller organizations to manage. They noted that this deadline is significantly shorter than in other jurisdictions, many of which provide a 60-day deadline. The Committee supported aligning the timeline with other jurisdictions, highlighting that this change could reduce the workload for organizations and increase consistency across lobbying legislation.

The Committee discussed the significant input it received regarding confusion and administrative demands arising from lobbying activity reporting. Members agreed that one key opportunity to support organizations, without undermining the transparency objectives of the Act, would be shifting from monthly to quarterly returns. Members agreed that this change could encourage participation by smaller organizations, in particular, which have more limited resources. Members also highlighted the need to simplify and streamline the reporting process to reduce misunderstandings and the reliance on extensive guidance materials. It was felt that moving to summary reporting of lobbying activities, rather than reporting each individual lobbying activity, could address these issues. The Committee further reflected on input regarding uncertainty around reporting social media activity and noted the need for clear direction on which social media communications constitute lobbying and must be reported. Members considered that a shift to summary reporting would further help ease the administrative workload associated with reporting individual social media posts.

The Committee agreed with the Registrar of Lobbyists that providing an understanding of the types of communications used while lobbying could enhance public awareness of different types of access and influence. Members added that the process to report this should be simple and not onerous. Also with respect to communication, Members noted that the requirement to report the administrative function of arranging meetings is creating unnecessary workload without increasing transparency. The Committee also acknowledged that input received indicated this requirement results in duplicative reporting without enhancing the objectives of the Act.

Regarding gift reporting, Members added that tracking and reporting would be easier for organizations if gifts were required to be reported once they have been given, rather than also when promised. They noted that this could reduce the confusion around reporting that was highlighted in the input the Committee received and would limit duplicate reporting. Members also highlighted that changing the gift reporting frequency to quarterly would reduce reporting demands and align gift reporting with the Committee's other recommendation to move from monthly to quarterly returns.

Committee Members considered how limiting funding disclosure to amounts directly tied to lobbying activities could ease administrative demands and improve transparency by more clearly identifying funding received as a result of lobbying. The Committee added that this change could also reduce the reporting demands for national organizations that are currently required to report funding received from outside the province. As a further means of streamlining this process and addressing administrative workload concerns, Members noted that consolidating funding returns with the information currently required in a monthly return, which would be submitted on a quarterly basis, could reduce duplication and improve efficiency.

*The Special Committee to Review the Lobbyists Transparency Act recommends to the Legislative Assembly that:*

9. The Act be amended to extend the 10-day filing deadline to 60 days for in-house lobbyists to submit a registration return when they start or resume lobbying.

10. The Act be amended to require that returns be filed with the Registrar of Lobbyists quarterly, rather than monthly.

11. The Act be amended to replace the requirement to separately report each individual lobbying activity with summary reporting of the number and topics of engagements with public office holders.

12. The Act be amended to require lobbying activity reports to include the types of communications used when lobbying a public office holder.

13. The definition of "lobby" in the Act be amended so that arranging a meeting with a public office holder is not considered lobbying, while participating in the meeting continues to constitute a reportable lobbying activity.

14. The Act be amended to require gifts to be reported to the Registrar of Lobbyists only once given to a public office holder, and not also when promised.

15. The Act be amended to change the reporting frequency of gifts given to public office holders from monthly to quarterly.

16. The Act be amended to require funding returns only where the funding received is related to lobbying activities.

17. The Act be amended to incorporate funding returns and monthly returns into one return, rather than separate returns, to be submitted quarterly.

# Prohibitions and Exemptions

## Gift-Giving

Organizations highlighted concerns over the gift-giving prohibitions prescribed in the Act. The Act prohibits lobbyists from giving or promising any gift or other benefit to a public office holder they are lobbying. The gift-giving prohibition does not apply for protocols or socially expected gestures associated with official duties of the public office holder, or when the total value of gifts within a 12-month period is below the $100 threshold set out in section 6 of the Lobbyists Transparency Regulation.

The Committee heard from several organizations that BC's gift-giving limit is low, especially when compared to other Canadian jurisdictions. The BC College of Family Physicians noted that inflation and rising costs have resulted in the existing gift limit being no longer practical, especially for standard outreach events such as annual dinners. Similarly, the Insurance Brokers Association of BC stated that the current gift-giving limit is quite restrictive given that the cost per person to host an event is typically more than the limit. The United Way of BC further noted that the current requirement to include all taxes, fees, and service charges when valuing gifts adds complexity. Therefore, the Committee received several recommendations to increase the gift-giving limit as well as to simplify the calculation of the total value.

Additionally, the BC Federation of Labour suggested harmonizing gift thresholds under lobbying and conflict-of-interest rules to reduce administrative burden and better reflect the actual risk of undue influence. The BC Federation of Labour noted that the Act sets a much lower gift-giving limit than the *Members' Conflict of Interest Act*. The Registrar of Lobbyists responded that the gift-giving prohibition protects public trust in lobbying. However, he acknowledged that the $100 annual limit, which was introduced five years ago, may now be outdated given inflation and rising hospitality costs.

Several organizations also explained that the current gift-giving prohibition is overly restrictive and limits their ability to offer modest hospitality or small tokens of appreciation to public office holders. CFIB noted that providing coffee and snacks during a meeting is a common courtesy that does not impact official decision-making. CFIB and other organizations recommended exempting modest gifts and hospitality from the gift-giving prohibition, including meals and refreshments at conferences, gifts and hospitality provided in common with other attendees at official meetings, and gifts and hospitality associated with standard educational or ceremonial events. In response, the Registrar of Lobbyists emphasized that the gift-giving prohibition is intended to prevent undue influence, noting research indicating that even small tokens–such as a meal or coffee–can affect decision-making. While the Act allows narrow exceptions for socially expected gestures, the Registrar cautioned that relaxing these rules or creating broad exemptions could invite exploitation and undermine the prohibition's purpose.

The Committee heard from organizations that recommended shifting the gift-giving timeline to a calendar-year basis, as it is currently calculated on a rolling 12-month period. Some organizations noted the administrative complexity of adhering to the gift-giving prohibition, including challenges hosting annual events that sometimes take place at different times from year-to-year. The Vancouver Foundation and Vantage Point stated that adjusting the annual gift-giving limit to apply to a given calendar year, rather than a 12-month period from the last event, would bring clarity, encourage compliance, and maintain transparency. The Business Council of British Columbia noted that the current 12-month period creates a particularly cumbersome tracking requirement for small organizations. The Registrar of Lobbyists supported the recommendation, stating that it would not oppose shifting the calculation period from a rolling 12-month timeframe to a calendar year. CFIB also recommended resetting the prescribed gift-giving limit when a new Parliament is formed.

The BC Real Estate Association noted that the phrase "protocol or social obligations that normally accompany the duties or responsibilities of the public office holder" in section 2.4 of the Act is vague and inconsistently applied. The Association explained that this ambiguity creates uncertainty around events such as receptions, even when organizations seek guidance from the Office of the Registrar of Lobbyists in advance. The Association recommended clarifying the standard with sector-specific examples.

## Consulates

The Committee heard from the World Sikh Organization of Canada that while it's reasonable for public office holders to engage with consulates on constituent issues, informal relationships beyond that scope raise concerns about foreign influence. The Organization suggested prohibiting lobbying through cultural- or consulate-related events and requiring public office holders to disclose such participation.

## Committee Discussion

Members recognized that the current rolling 12-month period of tracking and calculating gift-giving creates administrative challenges for hosting annual events. The Committee noted that shifting the rolling 12-month timeline to a calendar year basis would make calculation and reporting easier for organizations.

Committee Members deliberated on exempting hospitality-related costs from the gift-giving prohibition, thereby reducing complexity and improving clarity for organizations. Committee Members suggested a need to distinguish between "gifts" and hospitality, such as common courtesies or business practices, recognizing that such hospitality is often provided to support participation in official events, rather than to influence public office holders. Members further emphasized that hospitality exemptions should be limited to modest hospitality such as light meals provided during routine meetings and must not extend to higher-value offerings.

Members discussed challenges arising from complementary tickets to community events potentially being subject to the gift-giving prohibition. Members emphasized the importance of elected officials attending and participating in community and charitable events within their constituencies to support local organizations and raise awareness of important causes. They noted that some of the input received highlighted confusion around the rules for providing elected officials with complementary tickets to community events, and suggested that the Act and accompanying guidance should be reviewed to ensure elected officials can be invited to attend such events in an official capacity.

Members acknowledged rising concerns about foreign influence in Canada and noted that the topic warrants broader, cross-governmental attention. At the same time, Members recognized that meetings with consular officials can also serve constructive purposes as these engagements may promote understanding and support bridge-building between communities.

*The Special Committee to Review the Lobbyists Transparency Act recommends to the Legislative Assembly that:*

18. The Act be amended to calculate the exemption to the prescribed gift-giving prohibition on a calendar year basis.

19. The Act be amended to exempt from the gift-giving prohibition costs related to hospitality, including:

- hospitality provided in common with other attendees at official meetings or conferences; and
- hospitality associated with standard educational or ceremonial events.

20. The provincial government examine how the Act's gift giving prohibition affects public office holders' ability to attend community and charitable events in an official capacity.

# The Registrar

## Authorities

The Act prescribes that the Information and Privacy Commissioner under the *Freedom of Information and Protection of Privacy Act* is designated as the Registrar of Lobbyists. The Act provides the Registrar authorities to establish and maintain a registry, including powers to investigate, powers to compel persons and records, and discretion to receive information in confidence. Under section 9.4 of the Act, the Registrar may also develop and conduct public education to promote awareness and understanding of the Act.

The Registrar of Lobbyists explained that where a complex or unique factual situation arises, a detailed legal examination may be required to determine how a lobbyist can comply with the Act. The Registrar noted that section 9.4 of the Act allows the Registrar to offer general guidance and education; however, the Registrar currently does not have the authority to issue advisory opinions to clarify whether a fact or a circumstance would contravene the Act. Therefore, the Registrar recommended providing them with authorities to issue advisory opinions and interpretation bulletins with respect to the interpretation and application of the Act. The Registrar further explained that adding this authority would allow the Registrar to offer direct advice to a lobbyist on a complex or unique matter prior to it becoming an instance of non-compliance, providing better support to lobbyists that seek to comply with the Act.

## Resources and Guidance

The Committee heard that the Lobbyists Registry and support from the Office of the Registrar of Lobbyists could be improved. Some organizations noted that improving the functionality of the Registry and online support would make registering less time consuming and burdensome. The BC Real Estate Association and ACEC British Columbia's recommendations in this area included requiring the Registrar of Lobbyists to improve the functionality of the Registry by using clear terminology and providing templates and real-time support. Likewise, the Business Council of British Columbia suggested requiring the Registrar to develop Registry resources specifically for non-profits and associations, including plain-language guidelines and training. One individual recommended requiring the Registrar to ensure the Registry is user-friendly and to invest in public education for the purpose of the Registry. Lastly, the World Sikh Organization recommended requiring the Registrar to develop equity-based guidance for applying the Act's requirements and expand education supports including multilingual resources.

## Legislative Amendments

The Registrar of Lobbyists also recommended amending the Act to require the government to consult with their office before amending the Act or its regulations. The Registrar shared that this has been the typical approach but suggested that formalizing the requirement in the Act would ensure the practice continues. The Registrar shared that the advance notice allows their office to advise on the timing and cost of Registry updates, if they are required. It also allows for the development of guidance materials to support lobbyists to meet any new reporting requirements.

## Offences and Penalties

The Act currently states that anyone who contravenes the Act commits an offence and may face fines of up to $25,000 for a first offence and up to $100,000 for subsequent offences. The Registrar of Lobbyists may also prohibit the individual from lobbying or filing returns for up to two years. The Committee heard from an individual who advocated for stronger penalties and enforcement of the Act. Another individual suggested strengthening penalties for lobbying activities that engage in misinformation and dishonest advertising.

## Committee Discussion

Committee Members acknowledged that the authority to issue advisory opinions and interpretation bulletins would enable the Registrar to give direct, circumstance-specific advice to lobbyists, thereby improving navigation of the Act's requirements and preventing non-compliance. However, Members also reflected on the risk of additional advisory opinions and interpretation bulletins providing further complexity for those trying to navigate the Act's requirements and agreed there would need to be alignment with guidance documents.

Members acknowledged the need for the Registrar to develop equity-based guidance for the Act's requirements and to expand public education support including multilingual resources. They added that ensuring everyone understands the requirements of the Act may encourage more diverse participation in lobbying. Members noted that successful multilingual initiatives could significantly improve public awareness towards lobbying requirements and access to services.

The Committee noted that much of the input received related to a lack of clarity in reporting requirements, which has led to over-reporting, increased administrative workload, and a chilling effect on participation. Members emphasized the importance of the Registrar ensuring that the process for reporting lobbying activities is clear, user-friendly, and accessible. The Committee further emphasized the need to strike a balance between streamlining the guidance materials and providing adequate information to organizations.

Committee Members agreed that advance notice from the Ministry of Attorney General prior to introducing amendments to the Act enables meaningful consultation and allows the Office of the Registrar to provide input on implications for the Lobbyists Registry. The Committee appreciates that this has been standard practice, and acknowledged that legislating this practice would ensure its continuation.

While Committee Members supported the need for strong penalties for offences against the Act, they noted that the penalties prescribed in the Act are sufficient. The Committee also agreed that any penalties should be proportionate to the financial resources of the lobbying organization found to have committed an offence.

*The Special Committee to Review the Lobbyists Transparency Act recommends to the Legislative Assembly that:*

21. The Act be amended to provide the Registrar of Lobbyists with the authority to issue advisory opinions and interpretation bulletins with respect to the interpretation and application of the Act.

22. The Act be amended to require the Registrar of Lobbyists to develop equity-based guidance for applying the Act's requirements and expand educational support including multilingual resources.

23. The Act be amended to require that the Registrar of Lobbyists improve the usability and accessibility of the Lobbyists Registry, including through the provision of practical tools and support, tailored guidance for different types of organizations, and enhanced public education.

24. The Act be amended to require the Ministry of Attorney General to consult with the Registrar of Lobbyists prior to introducing legislative or regulatory amendments to the Act.

# Summary of Recommendations

*The Special Committee to Review the Lobbyists Transparency Act recommends to the Legislative Assembly that:*

1. The Act be amended to not consider an individual an in-house lobbyist if their lobbying activities total fewer than 50 hours within a calendar year, excluding preparation time, regardless of the size of the organization.
2. The Act be amended to require that in-house lobbyists employed by organizations whose primary purpose is to represent the interests of their members, or to promote or oppose issues, be subject to the same 50-hour lobbying registration threshold as other organizations.
3. The definition of "designated filer" in the Act be amended to include a person appointed by the most senior officer of the organization.
4. The Lobbyists Transparency Regulation be amended to establish a schedule of Provincial entities that is applicable for section 3(a) of the Regulation.
5. The Act be amended to expand the restrictions on its application to include oral and written submissions made to a Provincial entity that operates a business where the submission relates to the negotiation, renegotiation, renewal, amendment, extension, termination or implementation of any contract or other agreement into which the Provincial entity enters in the ordinary course of its business.
6. The Act be amended to expand the restrictions on its application to include oral or written submissions made in respect of any contract that is or will be subject to approval in a proceeding that is a matter of public record by a body or person having jurisdiction or powers conferred under an Act.
7. The definition of "lobby" in the Act be amended to refer to "contract for goods or services" where it currently refers to "contract".
8. The provincial government consult with federal and other provincial jurisdictions to explore opportunities to harmonize lobbying legislation.
9. The Act be amended to extend the 10-day filing deadline to 60 days for in-house lobbyists to submit a registration return when they start or resume lobbying.
10. The Act be amended to require that returns be filed with the Registrar of Lobbyists quarterly, rather than monthly.

11. The Act be amended to replace the requirement to separately report each individual lobbying activity with summary reporting of the number and topics of engagements with public office holders.
12. The Act be amended to require lobbying activity reports to include the types of communications used when lobbying a public office holder.
13. The definition of "lobby" in the Act be amended so that arranging a meeting with a public office holder is not considered lobbying, while participating in the meeting continues to constitute a reportable lobbying activity.
14. The Act be amended to require gifts to be reported to the Registrar of Lobbyists only once given to a public office holder, and not also when promised.
15. The Act be amended to change the reporting frequency of gifts given to public office holders from monthly to quarterly.
16. The Act be amended to require funding returns only where the funding received is related to lobbying activities.
17. The Act be amended to incorporate funding returns and monthly returns into one return, rather than separate returns, to be submitted quarterly.
18. The Act be amended to calculate the exemption to the prescribed gift-giving prohibition on a calendar year basis.
19. The Act be amended to exempt from the gift-giving prohibition costs related to hospitality, including:
    - hospitality provided in common with other attendees at official meetings or conferences; and
    - hospitality associated with standard educational or ceremonial events.
20. The provincial government examine how the Act's gift giving prohibition affects public office holders' ability to attend community and charitable events in an official capacity.
21. The Act be amended to provide the Registrar of Lobbyists with the authority to issue advisory opinions and interpretation bulletins with respect to the interpretation and application of the Act.
22. The Act be amended to require the Registrar of Lobbyists to develop equity-based guidance for applying the Act's requirements and expand educational support including multilingual resources.
23. The Act be amended to require that the Registrar of Lobbyists improve the usability and accessibility of the Lobbyists Registry, including through the provision of practical tools and support, tailored guidance for different types of organizations, and enhanced public education.
24. The Act be amended to require the Ministry of Attorney General to consult with the Registrar of Lobbyists prior to introducing legislative or regulatory amendments to the Act.

# Appendix: Consultation Participants

ACEC British Columbia

BC College of Family Physicians

BC Federation of Labour

BC Non-Profit and Charity Coalition

BC Real Estate Association

Ian Brown

Business Council of British Columbia

Canadian Cancer Society

Canadian Federation of Independent Business

Capilano Students' Union

Confederation of University Faculty Associations of BC

Julia Craig

FortisBC

Insurance Brokers Association of BC

Sasha Izard

Wendy Krahn

LandlordBC

Karl Mier

Onmi Milne

Lisa Morrow

MS Canada

Office of the Registrar of Lobbyists

Public Affairs Association of Canada – British Columbia

Brigitte Siebert

United Way British Columbia

Vancouver Foundation

Vantage Point

View Royal Climate Coalition

Zachary Wilson

World Sikh Organization of Canada