

We are concerned that those involved in non-profit organizations will construe any attempt to make them register if they are engaged in lobbying activities as being an attempt to inhibit their activities. On the other hand, if they are not required to register, it may leave a giant loophole in the system which could be utilized by those who do not want to have their lobbying efforts become part of the public record.

We have concluded that volunteer associations, single interest groups, and non-profit associations would not generally be required to register as lobbyists at this time. We realize that this decision eliminates a large portion of the lobbying population from the requirement of registration but we feel justified in making this determination at this time. We are concerned that a requirement such as registration may have a chilling or detrimental effect on their ability to organize and communicate effectively with government. However, when this matter is reviewed in two years' time, experience may indicate that these groups should be required to register.

Another question which has given your committee some difficulty is whether lawyers or accountants who represent clients in dealings with the government should be considered as lobbyists and required to register. Are those professionals who represent clients before either administrative or legislative tribunals engaged in lobbying? They are representing clients in judicial or quasi-judicial proceedings which are almost always held in public and as such would be required to identify their clients. We do not consider these activities to be acts of a lobbying nature. This should be contrasted with professionals who represent their clients in a much less public milieu for the purpose of influencing public policy or governmental activity.

We recommend that for the purpose of registration, lobbyist be defined generally to be anyone who for compensation engages in lobbying activities directed at the executive, bureaucracy, Members of the House of Commons, the Senate and their staff. More specifically it includes: