

Dear Mme Bélanger,

**Re: submission made on Rules in the *Lobbyists' Code of Conduct***

On July 15 I made a submission via your portal on behalf of the leaders of seven national environment organizations. We were only made aware of the consultations on the *Code of Conduct* a few days before the deadline for submissions. With a short timeline, we made a submission based on how we perceived the revised Code would impact us as not-for-profit environment organizations who engage in public interest lobbying.

The consultation is narrowly scoped to the Code of Conduct only and does not open up the questions around public interest lobbying. Upon reflection, we realize that our submission could be interpreted to support a relaxing of lobbying rules for actors who are lobbying to further degrade the climate and biodiversity of this planet. As such, we would like to withdraw our submission.

However, we would like to ensure that in your deliberations that you take note of the differential impact of any Code of Conduct changes on not-for-profit organizations engaged in public interest lobbying, organizations that also have staff who are civically engaged and who volunteer and sometimes work on campaigns. Any changes should be made in the context that this is a time when we should be encouraging engagement with the electoral process and not creating rules that discourage participation.

Private interest, for-profit lobbying is very different than charitable purpose lobbying for public interest purposes other than mere profit. The rules should reflect that distinction better and as a result, better serve the “expectations” of any proposed regime to promote transparency, respect for government institutions, and integrity and honesty. We would encourage you, in your role, to allow an opportunity for a further consultation and opportunity for engagement with your office that would allow better interrogation of the differences in types of organizations that lobby, and their purposes.

We would welcome follow up on either of these issues if you would like to discuss them further.

Sincerely,

Megan Leslie  
President & CEO, WWF-Canada

On behalf of:

Theresa A. McClenaghan, Executive Director and Counsel, Canadian Environmental Law Association

Tim Gray, Executive Director, Environmental Defence Canada

Colleen Thorpe, Executive Director, Equiterre

Gretchen Fitzgerald, National Programs Director, Sierra Club Canada Foundation

Canadian Parks and Wilderness Association

Graham Saul, Executive Director, Nature Canada

Maggy Burns, Executive Director, Ecology Action Centre