



June 15, 2022

The Honourable David Eby,
Ministry of the Attorney General
PO BOX 9044
STN PROV GOVT
Victoria BC, V8W 9E2

Re: Exempting Chambers and Boards of Trade from BC Lobbyists Transparency Act

Dear Minister Eby,

We commend you on the recent decision to exempt three organizations from requirements to register communications with government as lobbying under the ***Lobbyists Transparency Act 2020***. These non-profit organizations have an ongoing agreement to consult, advise and provide recommendations to government. As such, it makes sense to unburden their staff from monthly administrative requirements and potential financial punishments. We appreciate these exemptions because chambers of commerce and boards of trade deserve the same considerations.

The international chamber movement dates back to 1599 and continues to thrive in 2022 because of our role as a valuable link between people who drive the economy — entrepreneurs, craftspeople, traders and industrialists — and people who serve as public authorities. These historic roots as the legitimate voice of business continue to give chambers their purpose. And government benefits from gaining insight and information from chambers' constituencies.

However, regardless of its intentions, the ***Lobbyists Transparency Act 2020*** is negatively affecting the long-standing and mutually beneficial relationship between community chambers and elected officials.

Many smaller chambers don't have the capacity to take on additional administrative burdens. And despite efforts to streamline how organizations input data every month, using the Lobbyist Registry requires an understanding of bureaucratic terminology and a significant outlay of time. Add the risk of being financially penalized and publicly embarrassed because of a potential error or oversight and the process is intimidating. We've heard from some chambers that it has given them pause about reaching out to elected officials, resulting in a disconnect of a historic relationship. I'm sure you agree that is an unexpected impact of this legislation.

Last year, we asked your Ministry to consider four ways to improve the ***Lobbyists Transparency Act 2020***:

1. Update the definition of "small organization" under the ***Lobbyists Transparency Act 2020*** from six employees or less to 25 employees or less.
2. Amend the Act to provide full exemption for all "small organizations," regardless of membership-base composition or issues-based organization.



3. Alleviate the degree of obligation under the Act for organizations if sector or cross sector-based vs singularly company focused:
 - a. Only require the registration of an actual act of lobbying (letter, meeting, policy decision) upon completion, increase the 50-hour threshold to 200 for charities and not-for-profits, and eliminate the requirement for Chambers of Commerce and Boards of Trade altogether;
 - b. Establish a more streamlined lobbying tracking report form and process; and
 - c. Removing accumulated lobbying reporting requirements when working with other organizations.
4. Provide greater resources for education and training in the not-for-profit sector, small organizations and Chambers/Boards of Trade to understand the new Act and comply including on how to fulfill reporting requirements.

British Columbia is emerging from a pandemic and it will take the coordinated efforts of government and the business community to create a resilient economy that can address the challenges of our time.

We again ask that you address our suggestions and commit to honouring the historic role of chambers of commerce and boards of trade. This is not the time to silence voices that have a long history of advising government to help identify gaps and opportunities that will allow all British Columbians to participate in our economic recovery.

Sincerely,

Bruce Williams
CEO, Greater Victoria Chamber of Commerce

H. Captain (Navy) Anita Huberman
President & CEO, Surrey Board of Trade

Bill Collette
CEO, Alberni Valley Chamber of Commerce

Mary Ruth Snyder
Executive Director, Campbell River and District
Chamber of Commerce

cc: Michael McEvoy, Commissioner of the Office of the Information and Privacy / Office of the Registrar of Lobbyists info@oipc.bc.ca