

# ANNUAL REPORT 2022-23



**O·R·L·**  
office of the  
registrar  
of lobbyists  
**BRITISH COLUMBIA**



## WHO WE ARE

The Registrar of Lobbyists is an independent Officer of the Legislature who oversees, monitors, and enforces the *Lobbyists Transparency Act* (LTA). The LTA requires individuals and organizations who meet specific criteria to register their lobbying activities in an online public Registry.

The goal of the LTA is to promote transparency in lobbying and government decision-making.

**Michael McEvoy**, Information and Privacy Commissioner for BC, is designated as Registrar of Lobbyists for BC.

## OUR MANDATE

The mandate of the Registrar of Lobbyists is to:

- promote awareness among lobbyists of registration requirements;
- promote awareness among the public of the existence of the Lobbyists Registry;
- manage registrations submitted to the Lobbyists Registry; and
- monitor and enforce compliance with the Act.

## HOW WE DO OUR WORK

The Office of the Registrar of Lobbyists for British Columbia (ORL) provides a public record of who is attempting to influence government decisions. The ORL manages compliance through a number of strategies, including education and outreach to lobbyists and public office holders, verification of registration information, public reporting, and administrative penalties for non-compliance.



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August 2023

The Honourable Raj Chouhan  
Speaker of the Legislative Assembly  
Room 207, Parliament Buildings  
Victoria, BC V8V 1X4

Dear Honourable Speaker,

In accordance with s. 9.1(1) of the *Lobbyists Transparency Act*, I have the honour to present the Annual Report for the Office of the Registrar of Lobbyists to the Legislative Assembly.

This report covers the period from April 1, 2022 to March 31, 2023.

Yours sincerely,



**Michael McEvoy**  
*Registrar of Lobbyists for  
British Columbia*



## REGISTRAR'S MESSAGE

I am pleased to present the 2022-23 Annual Report of the Office of the Registrar of Lobbyists (ORL).

This report covers the second full year of our work under the *Lobbyists Transparency Act* (LTA) following landmark amendments to BC's lobbying legislation in 2020.

While year one emphasized basic education about these significant changes, the past twelve months saw us shift to more detailed conversations with the lobbyist community about compliance with the amended law, and how our office can best support that.

Those conversations were supplemented by wide-ranging consultations with lobbyists and the public on a variety of issues aimed at achieving the LTA's goal of increased transparency of lobbying activities. An example you will find in this report is the extensive survey we conducted leading to our updating of gift guidance — an important and complex area of the new law.

As a regulator I, of course, have enforcement tools to address non-compliance with the law. However, it has always been my approach to use those as a last resort. It is far preferable — and more effective over the long term in my view — to listen to the concerns of lobbyists, address gaps in their understanding of the law, and, in the spirit of the Act, foster a culture of transparency around attempts to influence our decision-makers. I take it as a mark of our success that it was only necessary to issue administrative penalties in three instances during the past year.

Education continues to be one of the most important tools we use to help lobbyists and the public understand how the lobbyist laws and systems work. We issued three guidance documents and updated eight on the ORL website this past year based on extensive feedback from lobbyists and members of the public. We published three issues of our *Influencing BC* newsletter aimed at educating and engaging lobbyists and members of the public on news related to lobbying in BC. I, along with several members of the ORL team, made several presentations during the year, explaining our



**“THE MAIN VEHICLE FOR THAT TRANSPARENCY IS THE BC LOBBYISTS REGISTRY AND I’M PLEASED TO NOTE THAT IT WAS VERY ACTIVELY USED OVER THE PAST YEAR: THERE WERE NEARLY 7,000 LOBBYING ACTIVITY REPORTS FILED DURING THE PERIOD COVERED BY THIS REPORT.”**

office’s role, the registration requirements under the LTA, and how to navigate the Registry. As always, the question-and-answer periods that followed these presentations were mutually beneficial with attendees learning more about the legislation and our office gaining, for example, a better understanding of compliance challenges faced by lobbyists.

Taken together, all of this work has served the purpose of ensuring that lobbying in British Columbia is carried out in a transparent manner. The main vehicle for that transparency is the BC Lobbyists Registry and I’m pleased to note that it was very actively used over the past year: there were nearly 7,000 Lobbying Activity Reports filed during the period covered by this report. The transparency offered by the Registry is there for anyone to access. Anyone can look to the Registry to see who is lobbying BC’s decision-makers and what they hope to influence. I would encourage the public to explore the wealth of information available on the Registry.

Of course, we would not be able to expand our educational efforts, enforce the LTA, and regularly update and improve the Registry were it not for the hard work and dedication of our talented ORL team. I would like to thank them for their commitment, and I would like to thank all stakeholders — lobbyists, government and the public this legislation serves — for working with us as we pursue our shared goal of transparent, accountable lobbying in British Columbia.

**Michael McEvoy**  
*Registrar of Lobbyists for British Columbia*

# YEAR IN REVIEW

April 1, 2022-March 31, 2023

## April 2022

- 01 First day of reporting period
- 01 ORL publishes **Who's Lobbying Who** (March 2022)(monthly summaries of lobbying activities submitted and activated)
- 25 ORL staff present to **BC Health Coalition** about understanding and working with the *Lobbyists Transparency Act*
- 25 ORL staff present to **Osgoode Hall** on trends and changes in the legislative and regulatory framework
- 27 Registrar presents **spring update** to the Select Standing Committee on Finance & Government Services



## May 2022

- 01 ORL publishes **Who's Lobbying Who** (April 2022)
- 05 ORL publishes **Public Office Holders and the Lobbyists Transparency Act** guidance document
- 20 ORL staff present to the **United Way Public Policy Institute** on the topic of understanding and working with the *Lobbyists Transparency Act*
- 25 ORL publishes **Registration Timelines** infographic

## June 2022

- 01 ORL publishes **Who's Lobbying Who** (May 2022)
- 08 ORL presents to BC Government Procurement Services to provide an overview of the ORL and its mandate
- 30 ORL presents to BC Government Procurement Services to follow up on previous presentation



## July 2022

- 01 ORL publishes **Who's Lobbying Who** (June 2022)

## August 2022

- 01 ORL publishes **Who's Lobbying Who** (July 2022)
- 24 ORL publishes **2021-22 Annual Report**



## September 2022

- 01 ORL publishes **Who's Lobbying Who** (August 2022)
- 07 ORL publishes **Accessing Information in the Lobbyists Registry** guidance document
- 28 ORL publishes **Influencing BC Vol. 12, Issue 2**



## October 2022

- 01 ORL publishes **Who's Lobbying Who** (September 2022)
- 06 ORL publishes revised **Exemption Process for Former Public Office Holders** guidance document
- 06 Registrar and Deputy Registrar attend national Lobbyists Registrars and Commissioners Network meeting in Quebec City
- 19 Registrar submits the 2023/24-2025/26 **Budget and Service Plan** and delivers **speech** to the Select Standing Committee on Finance & Government Services
- 27 ORL updates Registry to streamline entries for government funding information
- 27 ORL publishes revised **Consultant Lobbyist Registration Returns, Organization Registration Returns, Getting Started - Reference Guide**, and **How to Report Government Funding in the Lobbyists Registry** guidance documents



## February 2023

- 01 ORL publishes **Who's Lobbying Who** (January 2023)
- 07 ORL publishes revised **Non-Profit Organizations** guidance document
- 15 Registrar and staff provide update to Public Affairs Association of Canada, BC branch, on ORL news and information

## March 2023

- 01 ORL publishes **Who's Lobbying Who** (February 2023)
- 07 Registrar and staff attend virtual Lobbyists Registrars and Commissioners national Network meeting
- 13 ORL publishes **Lobbyist Gifts and Other Benefits** guidance document
- 17 ORL publishes **Influencing BC, Vol. 13, Issue 1**
- 24 ORL staff present to the **United Way Public Policy Institute** about non-profit use of the Lobbyists Registry and to provide an overview of the Registry
- 30 ORL staff present to **Vancouver Island University** on the topic of lobbyists regulation in BC
- 31 End of reporting period

## November 2022

- 01 ORL publishes **Who's Lobbying Who** (October 2022)

## December 2022

- 01 ORL publishes **Who's Lobbying Who** (November 2022)
- 05 ORL Registrar participates in panel to the **Council on Governmental Ethics Law** to discuss how disinformation is keeping people from the polls
- 05 ORL staff participate in panel to the **Council on Governmental Ethics Law** to discuss regulating lobbying by the non-profit community
- 06 ORL staff provide provincial and national lobbying update to the **Council on Governmental Ethics Law**
- 07 ORL staff participate in panel to **Council on Governmental Ethics Law** to discuss standards for transparent and ethical lobbying
- 15 ORL publishes **Influencing BC Vol. 12, Issue 3**
- 30 ORL publishes **Who's Lobbying Who** (December 2022)

# HIGHLIGHTS

## ORL holds public consultation on gift guidance dollar limit

As in-person meetings and events resumed over the past fiscal year, the ORL received many questions about the new gift-giving rules in the *Lobbyists Transparency Act* (LTA). To provide clarity and in keeping with the office's mandate to promote understanding of the LTA, the ORL invited all stakeholders — including lobbyists, public office holders, media, and members of the general public — to complete an online consultation about the LTA's gift prohibition and a proposed gift limit of approximately \$40. The ORL received 17 submissions from stakeholders, which can be viewed in their entirety on the ORL website.

Many respondents called for clarity as to when a gift meets the exception to the LTA's gift prohibition. While the consultation aimed to clarify whether a gift value limit could help determine whether a gift is normal to a protocol or social obligation (one consideration of the LTA's exception test), the ORL recognizes that each gift is unique and that under certain circumstances a gift with a higher value than \$40 may be normal. Lobbyists must also assess each gift within the context in which it is promised or given to determine whether or not it falls under the LTA's exception. After hearing from stakeholders, the ORL updated the Gift Guidance Document and posted the updated guidance to the website on March 13, 2023.



**DOWNLOAD:** *Lobbyists Gifts and Other Benefits*

## ORL attends regulator gathering in Québec

The Registrar attended the fall 2022 meeting of the Lobbyists Registrars and Commissioners Network (LRCN) in Québec City. The annual meetings are held by the group of regulators responsible for enforcing lobbying laws, regulations and policies at the federal, provincial, and municipal levels in Canada.

Members shared information about their legislative development and best practices regarding the responsibilities of regulators with oversight of lobbying activities.

Topics of discussion focused on: the impact of COVID-19 on lobbying; grassroots lobbying and the disclosure of funding sources for research, think tanks, and organizations; accountabilities of public office holders with regards to lobbying; and various approaches to promoting lobbyists' compliance. The Commissioners and Registrars reaffirmed the importance of lobbying and its transparency as an essential component of a sound democracy. The next LRCN meeting will be held in Victoria in fall 2023.



**DOWNLOAD:** *Annual Conference of the Lobbyists Registrars and Commissioners Network held in Quebec City*



## ORL introduces and updates key guidance documents

The ORL introduced or updated 11 guidance documents during the last fiscal as part of its educational mandate. Among these were guidance on:

- **Public Office Holders and the Lobbyists Transparency Act**, answers some of the most common questions public office holders have about lobbying in BC, explains some of the prohibited lobbying activities, and provides best practices for public office holders engaging with lobbyists.
- **Accessing Information in the Lobbyists Registry** highlights how the Registry serves as an online portal for journalists, organizations, and members of the public to learn about lobbying activities with BC public office holders. The guide helps readers understand what information is available in the Registry and provides examples on how to search the Registry.
- **Non-Profit Organizations and Lobbyists Gifts and Other Benefits** received substantial updates to help clarify the Registrar's guidance on the rules and requirements of the LTA.

## Registrar grants first exemption from the two-year lobbying prohibition

One of the aims of the *Lobbyists Transparency Act* (LTA) is to prevent former public office holders from having undue influence on government decision-making by prohibiting them from lobbying for two years after they leave office. Section 2.3 of the LTA, however, recognizes that there are instances when an exemption to this “cooling-off period” is in the public interest. Such was the case in Exemption Decision 22-01, the first request for an exemption to the two-year lobbying prohibition granted under the LTA. The applicant had previously served as Senior Vice President of the BC Financial Services Authority for 10 months and Chief Executive Officer of the Real Estate Council of British Columbia for five years. She applied for an exemption in her new role as Chief Executive Officer of the YWCA Metro Vancouver. The Registrar granted the exemption under s. 2.3, with conditions that she not lobby any public office holders in the Ministry of Finance or certain senior public office holders she worked closely with in the past, regardless of their current position. In the decision, the Registrar was satisfied the applicant intends to lobby on matters that do not concern the narrow organizational interests of the YWCA Metro Vancouver, but rather on those that serve the wider public interest, particularly issues impacting women, families, and vulnerable community members.



**DOWNLOAD:** *Public office holders and the Lobbyists Transparency Act*  
*Accessing information in the Lobbyists Registry*  
*Guidance for not-for-profit organizations on the Lobbyists Transparency Act*  
*Lobbyist Gifts and Other Benefits*



**DOWNLOAD:** *Exemption Decision 22-01*

# YEAR IN NUMBERS

## COMPLIANCE STATISTICS, 2022-23

### COMPLIANCE REVIEWS

Outstanding from 2021-22 fiscal year	0
New for 2022-23 fiscal year	1,253
<b>Total reviews:</b>	<b>1,244</b>
Information confirmed correct	21
Corrections required	631
Refuse to investigate (Warning email sent as matter minor or trivial)	590
Led to investigation	2
Ongoing at end of 2022-23 fiscal year	9

### INVESTIGATIONS

Outstanding from 2021-22 fiscal year	7
New for 2022-23 fiscal year	2
<b>Total investigations:</b>	<b>10</b>
Cease to investigate	0
Compliant with Act	0
Non-compliant with Act (no penalty)	0
Non-compliant with Act (administrative penalty imposed)	3
Reconsiderations	1
Ongoing at end of 2022-23 fiscal year	6

### EXEMPTION DECISIONS

New for 2022-23 fiscal	1
Ongoing at end of 2022-23 fiscal year	0

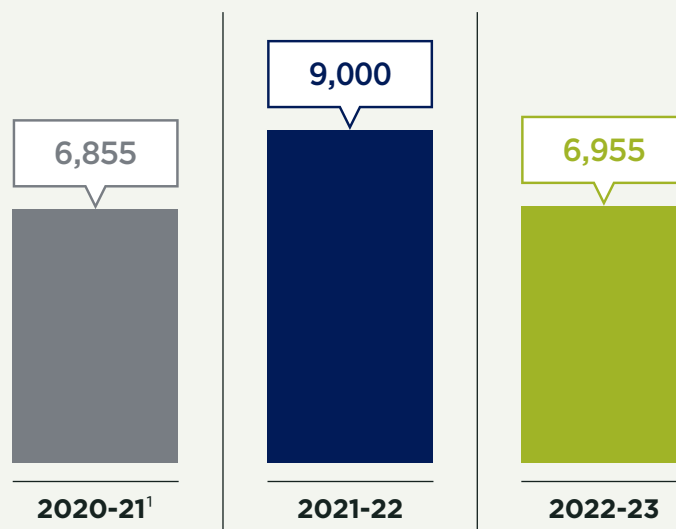
### REQUESTS FOR INFORMATION

2022-23	2,189
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## ACTIVE REGISTRATIONS



## LOBBYING ACTIVITY REPORTS COMPLETED



<sup>1</sup> The *Lobbyists Registration Amendment Act* brought in a new Lobbyists Registry; therefore, the 2020-2021 stats reflect the number of consultant lobbyists registered between May 4, 2020 and March 31, 2021. The previous Lobbyists Registry only captured the number of consultant lobbyists registrations, not the number of consultant lobbyists.

# YEAR IN NUMBERS

## LOBBYING TARGETS, 2022-23

### REGISTRATION RETURNS

Member(s) of the BC Legislative Assembly	764
Finance	624
Office of the Premier	603
Health	513
Environment and Climate Change Strategy	499
Jobs, Economic Recovery and Innovation	476
Energy, Mines and Low Carbon Innovation	365
Transportation and Infrastructure	313
Forests, Lands, Natural Resource Operations, and Rural Development	293
Indigenous Relations and Reconciliation	289

### LOBBYING ACTIVITY REPORTS

Member(s) of the BC Legislative Assembly	1,464
Energy, Mines and Low Carbon Innovation	821
Health	525
Office of the Premier	455
Environment and Climate Change Strategy	433
Jobs, Economic Recovery and Innovation	346
Finance	306
Forests, Lands, Natural Resource Operations, and Rural Development	277
Transportation and Infrastructure	229
Public Safety and Solicitor General	196

## TOP 10 SUBJECT MATTERS, 2022-23

### REGISTRATION RETURNS

Environment	487
Health	479
Economic Development and Trade	430
Finances and Budgets	391
COVID-19	321
Energy	317
Indigenous Relations and Reconciliation	291
Employment and Training	278
Transportation	255
Taxation and Finance	229

### LOBBYING ACTIVITY REPORTS

Environment	2,656
Health	1,842
Energy	1,833
Economic Development and Trade	1,830
Indigenous Relations and Reconciliation	1,804
Finances and Budgets	1,682
Employment and Training	1,306
Advanced Education	1,145
COVID-19	1,110
Taxation and Finance	1,101

# YEAR IN NUMBERS

## TOP INTENDED OUTCOMES OF LOBBYISTS, 2022-23

### REGISTRATION RETURNS

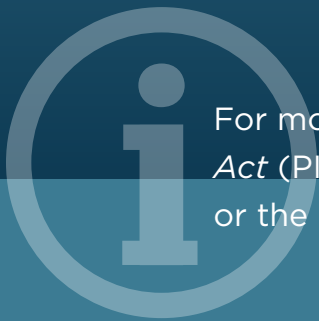
Development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity	1,072
Development or enactment of any regulation, including the enactment of a regulation for the purposes of amending or repealing a regulation	646
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	621
Development of any legislative proposal by the government of British Columbia, a Provincial entity or a member of the Legislative Assembly	535
Introduction, amendment, passage or defeat of any Bill or resolution in or before the Legislative Assembly	371
Decision by the Executive Council or a member of the Executive Council to have the private sector instead of the Crown provide goods or services to the government of British Columbia or a Provincial entity	93
Decision by the Executive Council or a member of the Executive Council to transfer from the Crown for consideration all or part of, or any interest in or asset of, any business, enterprise or institution that provides goods or services to the Crown, a Provincial entity or the public	57

### LOBBYING ACTIVITY REPORTS

Development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity	5,486
Development or enactment of any regulation, including the enactment of a regulation for the purposes of amending or repealing a regulation	3,245
Development of any legislative proposal by the government of British Columbia, a Provincial entity or a member of the Legislative Assembly	2,570
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	2,168
Introduction, amendment, passage or defeat of any Bill or resolution in or before the Legislative Assembly	1,807
Decision by the Executive Council or a member of the Executive Council to have the private sector instead of the Crown provide goods or services to the government of British Columbia or a Provincial entity	255
Decision by the Executive Council or a member of the Executive Council to transfer from the Crown for consideration all or part of, or any interest in or asset of, any business, enterprise or institution that provides goods or services to the Crown, a Provincial entity or the public	233

# ORL FINANCIAL REPORTING

The ORL's budget is incorporated into the budget of the Office of the Information and Privacy Commissioner. As part of the approval of the annual Estimates, the Legislative Assembly votes a budget for the two offices as recommended by the Select Standing Committee on Finance and Government Services.



For more information about the ORL's budget and *Public Interest Disclosure Act* (PIDA) disclosure, please see the 2022-23 OIPC Annual Report (page 32) or the Budget and Service Plan at [oipc.bc.ca](https://oipc.bc.ca) under "Reports."

## RESOURCES

The Office of the Registrar of Lobbyists publishes guidance documents to provide information and promote compliance. Here are the documents produced or updated in 2022-23. Check [lobbyistsregistrar.bc.ca](https://lobbyistsregistrar.bc.ca) for updates after March 31, 2023.

- [Accessing Information in the Lobbyists Registry](#)
- [Exemption Process for Former Office Holders](#)
- [Getting Started - Reference Guide](#)
- [Government Funding](#)
- [Lobbyists Gifts and Other Benefits](#)
- [Non-Profit Organizations](#)
- [Public Officer Holders and the \*Lobbyists Transparency Act\*](#)
- [Registration Timelines - Infographic](#)
- [User Guide: Consultant Lobbyist Registration Returns](#)
- [User Guide: How to Report Government Funding in the Lobbyists Registry](#)
- [User Guide: Organization Registration Returns](#)

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