



**CANADIAN
CO-OPERATIVE
ASSOCIATION**

*providing leadership
to promote, develop,
and unite co-operatives
and credit unions for
the benefit of people
in Canada and around
the world*

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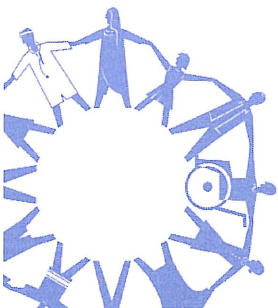
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To whom it may concern:

On behalf of the Canadian Co-operative Association, I am pleased to bring forward our observations on the proposed draft *Lobbying Act* regulations published in Part I of the Canada Gazette (January 5, 2008). CCA is a national apex organization representing co-operatives and credit unions across Canada.

We are very much in favour of moves to heighten accountability and transparency in the lobby system in Canada and support the spirit and intent of the regulations. We are a member of GRIC and have contributed to and support their recommendations. However, we would also like to underline two areas where we believe the regulations could be further strengthened.

Non-profit Organizations

At present, individual registration is required of all directors of boards of administration of non-profit organizations if their directors receive any form of compensation. We ask that a much simpler system be put in place where non-profit organizations file a single registration form and one regular report which includes both staff and board members who receive a payment. This will mean that all basic information for the non-profit organization can be found in one place and save organizational time and effort coordinating the update of many individual files. Also it will be simpler for the government to review the activities of these organizations.

Reporting by Government

Just as registered lobbyists report all meetings with government elected officials and certain civil servants, we request that government also be subject to the same rules.

We believe that this addition has the following advantages:

1. All meetings are usually recorded already, so have the data is available.

2. There are far less government elected officials and designated civil servants than there are lobbyists, so the total additional work required would be less.
3. This practice would assure that government meetings with unregistered lobbyists, as well as with registered lobbyists who fail to report a particular meeting, would be identified.

We believe that the practice of government reporting would insure a higher degree of transparency and accountability and, in the end, would be more practical for government in monitoring its own relations with lobbyists.

We would be happy to discuss any of these points in more detail with you.

Yours sincerely,



John Anderson
Director,
Government Affairs and Public Policy