



O.R.L.

office of the
registrar
of lobbyists

BRITISH COLUMBIA

GUIDANCE DOCUMENT

GOVERNMENT FUNDING

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PURPOSE OF THIS GUIDANCE DOCUMENT

Notice

This document is for information purposes only and does not constitute a decision or finding by the Registrar of Lobbyists for British Columbia or their delegates. This guidance does not affect the powers, duties or functions of the Registrar of Lobbyists, or their delegates, regarding any investigation or other matter under the *Lobbyists Transparency Act*, respecting which the Registrar and their delegates will keep an open mind. Responsibility for compliance with the *Lobbyists Transparency Act* remains with each client, lobbyist, and public office holder.

This guidance document is intended to help lobbyists understand what is meant by the term “government funding” and the associated reporting obligations.

The [Lobbyists Transparency Act](#) (LTA) requires Designated Filers to provide information about government funding their organization (or, for consultant lobbyists, their client) has **received**.¹ This requirement applies to all filers: consultant lobbyists or for organizations with in-house lobbyists, including non-profit and for-profit organizations.

In their initial or reactivated Registration Return, filers must report:

- the name of each government, government agency, or Provincial entity from which funding was received within the preceding 12 months; **and**
- the amount of funding received from each source.

Filers are required to report additional government funding that is received after their initial Registration Return is submitted. Designated Filers have three months plus 15 days following the month in which government funding is received to report this information in the Lobbyists Registry (more detail on this filing deadline can be found later in the “[What is the deadline for reporting additional government funding?](#)” section of this document).

Filers must report received government funding from any level of a domestic or foreign government, government agency or Provincial entity in the Lobbyists Registry.

GOVERNMENT FUNDING

What is government funding?

Government funding includes:

¹ Prior to May 27, 2025 Designated Filers were required to report information on both **requested** and received government funding on a monthly basis. The *Miscellaneous Statutes Amendment Act, 2024* **eliminated** the requirement to report **requested** government funding and extended the deadlines for reporting **received** funding.

- Government grants;
- Non-repayable contributions or funding arrangements;

Government funding does *not* include:

- Repayable contributions;
- Loans and loan guarantees;
- Tax credits;
- Remission orders;
- Payments pursuant to contracts for goods and/or services.

Payments pursuant to contracts for goods or services

Payments pursuant to contracts for goods and services with a government, government agency, or Provincial entity do not constitute government funding under the LTA and do not need to be reported in the Lobbyists Registry. If your organization or client receives payment in direct exchange for specific goods and services delivered as part of a contract with a government, government agency or provincial entity, those payments do not need to be reported in the Registry.

Some common examples of goods and services contracts may include:

- A government ministry contracting with a non-profit community service organization to provide specific services to community members.
- A government agency contracting with a business to provide the government agency with office supplies and equipment.

However, every situation is unique and the entire context of the payment arrangement must be considered when assessing whether a payment must be reported in the Lobbyists Registry as government funding. If you have questions or concerns about whether funds received from a government source must be reported, please contact the ORL at info@bcorl.ca.

What is the deadline for reporting government funding in the initial or reactivated Registration Return?

Government funding from the preceding 12 months must be reported in the initial or reactivated Registration Return, which must be filed within 10 calendar days of the start or resuming of lobbying activities.

What is the deadline for reporting additional government funding?

Additional government funding received after the initial or reactivated Registration Return is filed must be reported on an ongoing basis as part of a “Funding Return.” The deadline to report additional government funding is 15 days after the expiration of a three-month period, which begins on the first day of the month following the month in which funding is received. See the table below for Funding Return filing deadlines:

If your client or organization receives government funding <i>anytime</i> in:	...the deadline to report the funding is:*
January	May 15
February	June 15
March	July 15
April	August 15
May	September 15
June	October 15
July	November 15
August	December 15
September	January 15
October	February 15
November	March 15
December	April 15

** If the 15th of the month falls on a Sunday or holiday, the deadline is the next day that is not a Sunday or holiday.*

Which government funding sources must be reported?

The reporting requirement applies to funding from **any** Canadian or foreign government, including any municipal, provincial, territorial, regional, or state government. This is in addition to funding from **any** government agency or Provincial entity.

My organization is *not* lobbying BC public office holders, but we have received a government grant. Do I need to report this in the Lobbyists Registry?

No. If your organization is not lobbying *any* BC public office holder on *any* issue, there is no obligation to register in the Lobbyists Registry and, consequently, no obligation to report government funding received.

Applying for a government grant or other non-repayable funding arrangements through a formal application process is likely not considered lobbying and would not require your organization to register in the Lobbyists Registry.

However, if you step outside the formal application process and communicate with a BC public office holder in an attempt to influence the process or outcome of the application, that would likely be considered lobbying and would require your organization to register in the Lobbyists Registry.

As part of this registration, you would be required to report any government funding your organization received over the preceding 12 months.

Similarly, if your organization begins lobbying *any* BC public office holder on *any* issue, you would be required to register that activity in the Registry and report any government funding your organization received over the preceding 12 months.

Am I lobbying? Contracts for goods and services

Strictly following an established process to enter a contract for goods or services, such as submitting a bid in response to a request for proposals (RFP), likely does not qualify as lobbying. However, contacting a public office holder in an attempt to influence the contents of the RFP in advance of the official procurement process, or attempting to influence the outcome of the process, likely *is* lobbying and may require registration in the Lobbyists Registry.

Similarly, negotiating changes to an existing contract for goods or services based on the contract's existing terms would likely *not* constitute lobbying. However, if the scope of the changes is substantial enough to fundamentally alter the contract, the associated communications would likely qualify as lobbying and may require registration.

Please see the guidance document [Procurement](#) for further information on lobbying and procurement processes.

My organization is part of a larger entity. Do I need to report government funding received by the larger entity?

No. Only the legal entity that is carrying on lobbying activities in BC is required to declare government funding received.

- If the client or organization carrying on lobbying activities is a corporation, lobbyists do not need to report government funding received by subsidiaries or parent corporations.
- If the client or organization carrying on lobbying activities is the local chapter of a regional, national, or international entity, the local chapter does not need to declare funding received by the larger entity as long as the local chapter is a separate legal entity with its own constitution and bylaws.

Do I need to report government funding?



Our organization has an active registration in the Lobbyists Registry and has received approval for government funding that will have to be reported, but we have not received the funds yet. When do we report this funding in the Lobbyists Registry?

Once the funding is confirmed, you have two options. You can declare it:

- As of the date you receive *written confirmation* that you will be receiving funding; OR
- As of the date the funds are paid into your organization's bank account.

Whichever date you choose, you will have until the 15th day of the month following the expiration of the "three-month period" to report the *received* funding in the Lobbyists Registry. Please see the table on page 4 for the deadlines to report received funding.

Our organization has been approved for government funding that will be paid in multiple installments. How do we report this?

When you enter information about government funding received, you have the option of declaring it as one-time funding or as funding over a longer period of time.

If you are declaring a **one-time payment**, enter the same date in the start and end date fields. For example, if you receive a grant of \$20,000 on January 20, 2024, you would enter January 20, 2024 in the start date and end date fields.

If you declare **funding over a period of time**, you must enter the start date and end date of the funding into the Registry.

If you receive **multi-year funding**, you can choose to enter the full amount for the entire period into the Registry at the outset. If you choose this option, you must enter the actual start and end dates of the funding period (e.g. July 1, 2022 to June 30, 2024). This entry would not need to be updated unless something changes in the funding amount or time period. If an update is required, you must contact ORL staff for assistance (info@bcorl.ca).

Alternatively, you may enter the amount you will receive in the first instalment and the date range covered by that instalment, and then update the Registry each time something changes, such as the amount and date range of a new instalment.

If you choose to report the funding as separate installments, each installment must be reported within three months plus 15 days following the month the installment is received. For example, if you receive the first installment on January 20, this installment must be reported by May 15. If the second installment is received on February 20, the second installment must be reported by June 15. See the table on page 4 for the reporting deadlines.

Whether the funding you receive from a government source is a fixed amount or variable will also determine how it is reported.

EXAMPLES TO ILLUSTRATE

*The following examples are provided to highlight key aspects of reporting government funding. These examples should **not** be viewed as predeterminations for assessing whether any actual government funding must be reported, as the entire context of each situation must be considered. To seek further guidance on reporting government funding, please contact the Office of the Registrar of Lobbyists for BC at info@bcorl.ca and provide all relevant details for consideration.*

Examples of government funding which require registration

1. Your organization is lobbying public office holders in the Government of BC and has an active registration in the BC Lobbyists Registry. You apply for a \$10,000 grant from a Federal Canadian government agency. The application is partially approved and your organization receives written confirmation that it will be receiving \$5,000 as a lump sum.

You must report:

- The name of the federal government agency and the \$5,000 as received government funding. This information must be reported in one of two ways:
 - As of the date you receive *written confirmation* that you will be receiving funding; OR
 - As of the date the funds are paid into your organization's bank account.

Whichever date you choose, you will have until the 15th day of the month following the expiration of a three-month period to report the received funding in the Lobbyists Registry. (see table on [page 4](#) for reporting deadlines)

2. Your charitable organization is hosting a community fundraising event that is sponsored, in part, by a government agency. The government agency is providing your organization with \$1,500 to help cover the costs of hosting the event. Your organization is also lobbying BC provincial public office holders on several matters and has an active registration in the BC Lobbyists Registry.

You must report:

- The name of the government agency and the \$1,500 as received government funding. This information must be reported in one of two ways:
 - As of the date you receive *written confirmation* that you will be receiving the funding; OR
 - As of the date the funds are paid into your organization's bank account.

Whichever date you choose, you will have until the 15th day of the month following the expiration of a “3-month period” to report the received funding in the Lobbyists Registry. (see table on [page 4](#) for reporting deadlines)

3. Your organization received confirmation of a non-repayable \$5 million funding arrangement from a BC government ministry. The funding will be received in installments over a five-year period. Your organization lobbies BC public office holders and maintains an active registration in the Lobbyists Registry.

You must report:

- The name of the government ministry and the \$5 million as received government funding. You can either:
 - Submit a one-time entry for the full \$5 million amount now, including the start and end days of the five-year period, OR
 - Enter the amount you will receive in the first installment, including the start and end dates covered by that installment. You will then need to update the amount in your Registration Return each time you receive a new installment.

If you choose to report the funding as a one-time entry, you will have until the 15th day of the month following the expiration of a three-month period to report the received funding in the Lobbyists Registry. The three-month period begins the month following the month in which you received written confirmation or the month in which the first installment of funding was received.

If you choose to report the funding as separate installments, you must report each installment by the 15th day of the month following the expiration of a three-month period. (see table on [page 4](#) for reporting deadlines)

4. Your organization successfully secured government funding from a BC ministry for a program you developed. This program will be funded at a variable amount depending on how many people register or how often the program is offered each year. Your organization lobbies the BC government and maintains an active registration in the Lobbyists Registry.

You must report:

- The name of the government ministry, the amount of funding received, and the date range that the funding will cover.
- Each time the funding amounts change, you will need to update your Registration Return with the new amount(s) and date range. For example, if the funding details change three times in a year, you will need to update your Registration Return each of those three times by the 15th day of the month

following the expiration of a three-month period. (see table **on page 4** for reporting deadlines)

- If you need to edit previously entered funding information, please contact ORL staff for assistance (info@bcorl.ca).

Examples of funding sources that do not require reporting

5. You are the CEO of a non-profit organization that provides supports and services to individuals living in the community. Your organization regularly enters into contracts with a BC government ministry to provide specific services to these individuals in direct exchange for payment from the BC government. Your organization lobbies BC provincial public office holders and maintains an active registration in the BC Lobbyists Registry.

You do not need to register payments pursuant to these contracts as government funding.

- Payments pursuant to contracts for services are not considered “government funding” for the purposes of the LTA and consequently do not need to be reported.
 - If your organization receives government grants or other non-repayable government funding contributions outside of these services contracts, those funding arrangements would need to be reported.
6. Your organization applies for a BC Multicultural and Anti-racism grant using the online application process on the BC government website. You adhere strictly to the application process and do not communicate with any BC public office holder in an attempt to influence the outcome of the grant decision. You are approved for the grant and receive \$5,000 from the BC government. Your organization does not lobby *any* BC public office holder on *any* issue.

You do not need to report this government funding.

- Because your organization is not lobbying *any* BC public office holder on *any* issue, you do not need to be registered in the Lobbyists Registry. Consequently, you do not need to report any government funding you receive.
- Strictly adhering to a formal process to complete a government grant application is not considered lobbying.
- However, if your organization steps outside the formal application process and communicates with a BC public office holder in an attempt to influence the decision of the grant, that would likely be considered lobbying. This would require you to complete a Registration Return in the Lobbyists Registry and report the received grant as government funding.

- Similarly, if your organization begins lobbying *any* BC public office holder on *any* issue within 12 months of receiving this grant, you would be required to complete a Registration Return in the Lobbyists Registry and report this grant as government funding.