Office of the Registrar of Lobbyists for British Columbia

# **Annual Report and Service Plan**



# **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 Harvey**, Information and Privacy Commissioner for British Columbia, is designated as Registrar of Lobbyists for BC.

The Office of the Registrar of Lobbyists for BC respectfully acknowledges that its office is located on the traditional territories of the Lekwungen people of the Songhees and Esquimalt Nations.

As an Officer of the Legislature, the work of the Registrar spans across British Columbia, and the ORL acknowledges the territories of First Nations around BC and is grateful to carry out our work on these lands.





June 2025

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 of the *Lobbyists Transparency Act*, I have the honour of presenting the office's Annual Report for the Office of the Registrar of Lobbyists to the Legislative Assembly.

This report covers the period from April 1, 2024 to March 31, 2025.

Yours sincerely,

**Michael Harvey** 

Information and Privacy Commissioner and Registrar of Lobbyists for British Columbia







I am pleased to present the 2024/25 Annual Report and Service Plan of the Office of the Registrar of Lobbyists (ORL).

This report marks my first year as the Registrar of Lobbyists for British Columbia. It is my privilege to oversee a lobbying regime at a time when the transparency and accountability it provides are vital to the health of our democracy.

That transparency is achieved every day in our Lobbyists Registry when lobbyists document their attempts to influence government decision-making. It is strengthened every time lobbyists contact us to clarify their responsibilities and through the education and enforcement activities of my office.

Why is this work so important?

Now more than ever, transparency in government decision-making is our best hope of upholding the integrity of public institutions.

A central, accessible and transparent record of who is trying to influence government decision-making helps challenge narratives of special interests having undue influence, or of backroom deals dictating government actions.

It challenges inaccurate information and conspiracy theories with well documented

facts that are publicly available on the Lobbyists Registry.

To make good public policy, government needs lobbyists. They need stakeholders who are passionate about and knowledgeable in their respective areas to share their expertise and the interests of the people they represent to inform and improve public policy development.

What's crucial here is transparency – ensuring not only that government is getting the best information possible to make policy decisions, but that the public knows who is providing that information and when they're doing so.

That transparency also helps let us know when important voices are missing from these discussions, improving the diversity and equity of government decision-making.

Transparency is in the name of the act we enforce – the *Lobbyists Transparency Act* – and achieving that for the public guided our work throughout this fiscal period. During this time, there were 6,353 Lobbying Activity Reports entered into the Registry.

The primary aim of the ORL is education.



We want all lobbyists – regardless of the size of their organization or the scope of their lobbying activities – to understand the rules and act on their obligations. This is the best way to promote compliance with the Act.

Over the past fiscal year, ORL staff and I conducted five speaking engagements to promote awareness of the requirements of the LTA and understanding of the process for accessing and submitting required information to the Lobbyists Registry.

The ORL also responded to 1,760 requests for information, updated three guidance documents and created a new infographic to assist lobbyists to understand changes to registration brought on by the *Miscellaneous* Statutes Amendment Act. We also published two editions of our Influencing BC newsletter.

A major focus of the guidance document updates, and the September 2024 issue of *Influencing BC*, was the October 2024 BC provincial election. Our updated guidance on How to Report Political, Sponsorship and Recall Contributions in the Lobbyists Registry, and Political, Sponsorship or Recall Contributions aimed to help lobbyists understand the special considerations during the election period.

While my office leads with education, I do have **Michael Harvey** enforcement tools to remind organizations

and others, if necessary, of their obligations under the Act.

During the period covered in this report, our office issued five Determination Decisions, and one Exemption Decision. The decisions are available on our website and are an excellent resource for lobbyists to better understand the LTA and its application in BC across numerous contexts.

I would like to thank the dedicated ORL staff for the work they do every day, from answering front-line questions, to detailed policy analysis, compliance investigations and reports, maintaining the Registry, and more.

They work every day to realize the transparency and accountability goals that drive the LTA. I remain committed to those goals and to defending and strengthening this important democratic safeguard.

I look forward to working with lobbyists, public officials, and citizens alike to uphold these principles that keep our democracy strong and worthy of public trust.

Registrar of Lobbyists for British Columbia

# **MANDATE**

# WHO WE SERVE

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 the Registry and registrations submitted to it; and
- monitor and enforce compliance with the LTA.

Under the LTA, the ORL serves:

- 1. the public;
- 2. the Legislative Assembly of British Columbia; and
- 3. BC lobbyists and public office holders.

The Information and Privacy Commissioner is designated the Registrar of Lobbyists for the purposes of the *Lobbyists Transparency Act* (LTA). See <a href="https://www.oipc.bc.ca/reports/budget-annual-report-service-plan/">https://www.oipc.bc.ca/reports/budget-annual-report-service-plan/</a> for the 2024/25 Annual Report and Service Plan for the Office of the Information and Privacy Commissioner.

# **HOW WE WORK**

The Office of the Registrar of Lobbyists for British Columbia (ORL) addresses concerns about the integrity of government decision-making by providing a public record of who is attempting to influence government decisions. The ORL manages compliance through many strategies, including education and outreach to lobbyists and public office holders, verification of registration information, public reporting, compliance reviews, investigations, and administrative penalties for non-compliance.

# A dedicated staff, committed to service

Sixty-three people worked at the Office of the Information and Privacy Commissioner in 2024/25, including four dedicated staff of the Office of the Registrar of Lobbyists and 10 staff that work for both offices. They were supported by the Corporate Shared Services team responsible for providing finance, HR, IT, and facilities management to the OIPC/ORL and the three other Officers of the Legislature: the Office of the Merit Commissioner, the Office of the Police Complaint Commissioner, and the Office of the Ombudsperson.

OIPC/ORL staff recognize they are part of a wider community. They take pride in, and have long supported, community causes. This includes the Provincial Employees Community Services Fund, as well as other local causes. OIPC/ORL staff were recognized for their contributions to the 2024 PECSF campaign receiving two awards for highest employee participation and for highest average employee donation.

# **OUR TEAM**

Staff at the ORL are delegated by the Registrar to carry out the responsibilities and powers of the Registrar under the *Lobbyists Transparency Act* (LTA).

#### Registrar

The Registrar manages the Lobbyists Registry and promotes compliance through education for lobbyists and the public.

The Registrar also has the legal authority to investigate potential non-compliance with the LTA, issue administrative penalties, submit reports of non-compliance to the Legislative Assembly to ensure compliance with BC's lobbyist legislation, and issue reports of Reconsideration.

#### **Deputy Registrar**

The Deputy Registrar oversees the teams that carry out the Registrar's authorities to maintain the Registry, carry out education, and conduct enforcement. The Deputy Registrar provides strategic advice to the Registrar and administers finance and human resource functions as delegated by the Registrar.

#### Communications

The communications team publicizes the work of the office, and coordinates public education opportunities to inform people in BC about lobbying. The ORL's website, media relations, newsletter, and event planning all fall under this department's oversight.

#### Legal

The legal team delivers comprehensive legal advice and guidance to the Registrar and staff on current and emerging matters relating to lobbying, as well as on matters relating to administrative law, common law, and constitutional law.

#### **Executive support**

The executive support team assists the Registrar, Deputy Registrar, and ORL team with scheduling, organizing, and maintaining office facilities, and other administrative tasks as required.



#### **Investigation**

The investigations team decides whether to investigate potential matters of non-compliance. Compliance investigations are assigned to an investigator who reviews the facts and gives the lobbyist an opportunity to be heard before determining whether there has been a contravention, or contraventions, of the LTA.

If non-compliance is found, an administrative penalty may be issued. Administrative penalties can be monetary penalties or a penalty prohibiting lobbying. Decisions are published on the ORL website and tabled with the Legislative Assembly.

#### **Policy**

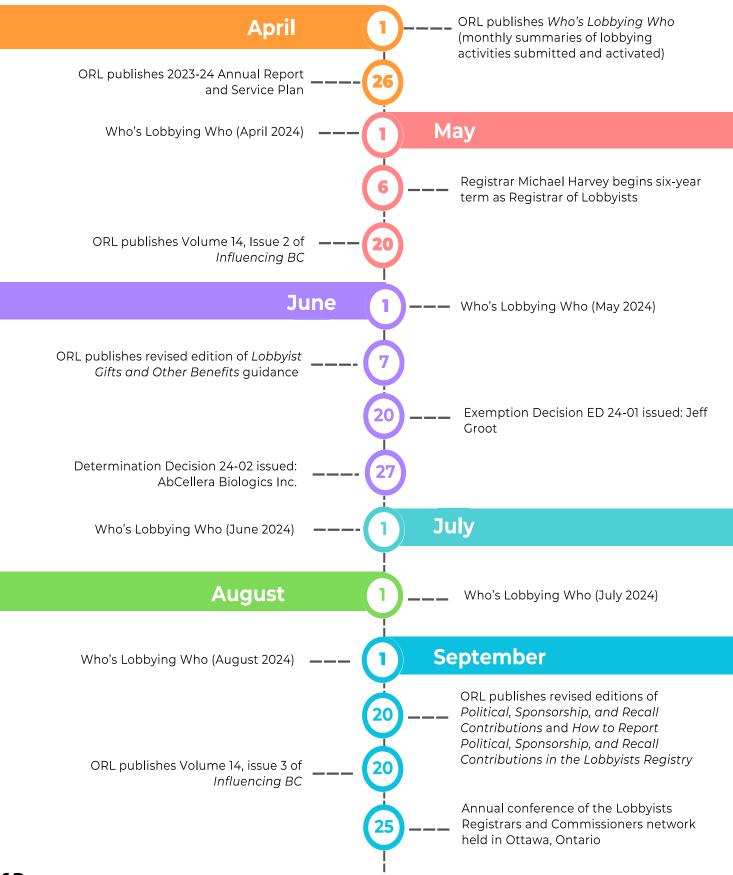
ORL policy staff conduct research and analysis of current and emerging lobbying issues and develop education, outreach, and guidance documents to educate the public and relevant stakeholders about the LTA. This includes legislative review work and recommending courses of action that promote transparency in lobbying.

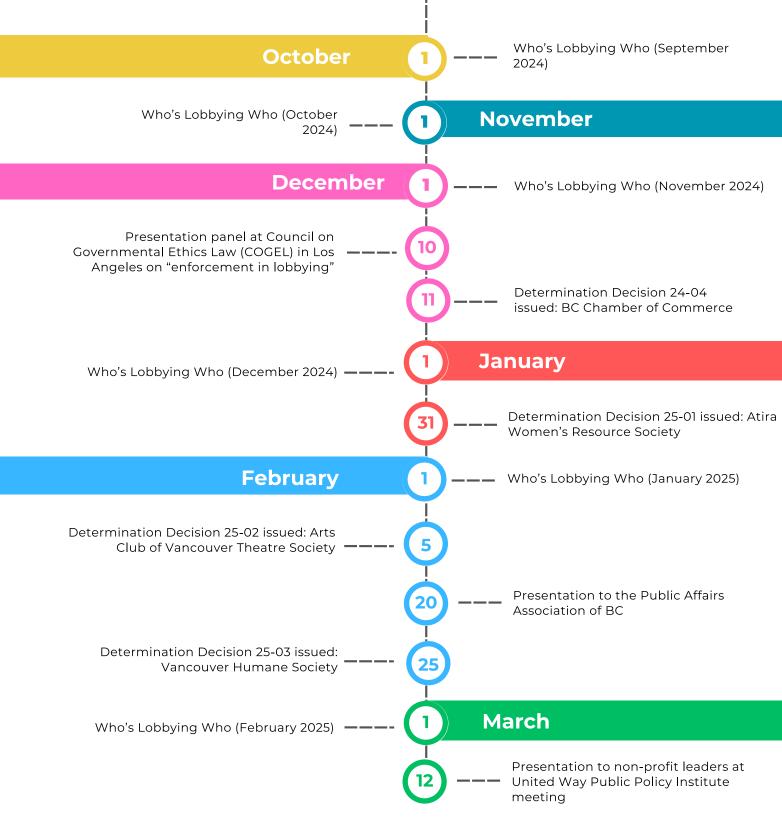
#### **Registry and compliance**

ORL Registry staff are the first point of contact for lobbyists, as well as members of the public, public office holders and other stakeholders who have questions regarding the LTA. They provide information and guidance to support compliance, review registrations submitted to the Lobbyists Registry, and identify potential instances of non-compliance. Registry staff have delegated authority to make decisions regarding the verification of information provided in a registration, accept a registration or refuse one that does not comply with the LTA, and remove a registrant who fails to comply with the LTA.

Registry staff also scan the Registry for those who may have inaccurate information in their registrations, and media, websites, and press releases to identify those who may be lobbying without registering. Staff contact lobbyists to clarify information in the Lobbyists Registry or to inquire about whether registration is required. An investigation may be initiated to determine if a lobbyist has complied with the LTA.

# **YEAR IN REVIEW**





Monthly summaries of *Who's Lobbying Who*: <a href="https://www.lobbyistsregistrar.bc.ca/the-registry/whos-lobbying-who/">https://www.lobbyistsregistrar.bc.ca/the-registry/whos-lobbying-who/</a>

ORL guidance documents, *Influencing BC*, and other resources: <a href="https://www.lobbyistsregistrar.bc.ca/resources/guidance-documents/">https://www.lobbyistsregistrar.bc.ca/resources/guidance-documents/</a>

Reports of non-compliance, reconsideration reports, and exemption decisions: <a href="https://www.lobbyistsregistrar.bc.ca/decisions/">https://www.lobbyistsregistrar.bc.ca/decisions/</a>



# Guidance updates: registration changes, gifts, and election rules for lobbyists

The ORL published a new infographic and updated three guidance documents during the last fiscal year to assist lobbyists in their understanding of their obligations under the *Lobbyists Transparency Act* (LTA). These included:

- What do the amendments in the Miscellaneous Statutes Amendment Act, 2024, mean for my lobbying registration? (infographic outlining registration changes introduced by Bill 9, the Miscellaneous Statutes Amendment Act, 2024);
- <u>Lobbyists Gifts and Other Benefits</u> (guidance document updated to include information on donations in lieu of tangible gifts); and
- Political, Sponsorship, and Recall Contributions and How to report political, sponsorship
  and recall contributions in the Lobbyists Registry (both updated prior to the Oct. 19, 2024
  Provincial General Election).

# High-level panels and presentations advance ORL education mandate

Michael Harvey, Registrar of Lobbyists for British Columbia, and ORL staff are frequent speakers at events across the province and beyond as part of the ORL's education mandate.

Events featuring ORL speakers and presenters during the 2024/25 fiscal year included:

- Presentations about the ORL, the LTA, and lobbying to the Green Party and New Democrat Party MLAs in Victoria following the Provincial General Election;
- A keynote presentation to provide an update to members of the Public Affairs Association of Canada, BC chapter (PAAC-BC); and
- A keynote presentation about understanding and working with the LTA for non-profit leaders at the United Way Policy Institute.

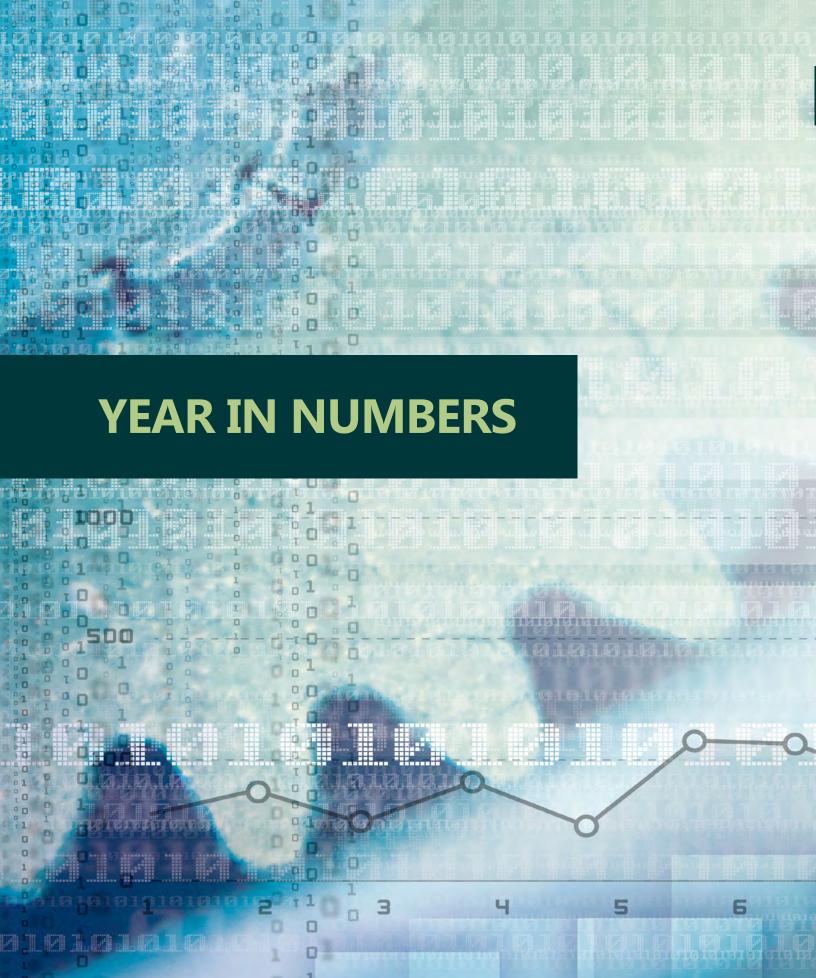
# Registrar publishes Reports of Non-Compliance and an Exemption Decision

The ORL has the authority to investigate alleged lobbyist contraventions, such as failing to register or report required information, or reporting the required information late. Determination decisions regarding compliance, reconsiderations, and decisions can be viewed on our website under Decisions.

During the 2024/25 reporting year, the Registrar issued five determination decisions regarding compliance, and one exemption decision.

#### **ORL staff prepare for legislative changes**

In 2024/25, ORL staff prepared for the *Miscellaneous Statutes Amendment Act, 2024* to come into force on May 27, 2025. With that coming into force, Designated Filers no longer need to report details related to *requests* for government funding, such as the source and amount of funding requested. The requirement to file these details for government funding received by their organization or client remains, but the deadline to file this information is extended from one month to three months plus 15 days. Additionally, the amendments clarify the filing obligations around working with other lobbyists, organizations, and clients for the purpose of lobbying and what must be submitted when lobbying ends. New and updated guidance materials were prepared for the ORL website and changes to the Lobbyists Registry were planned to accommodate the deadline extension to report government funding coming into force.

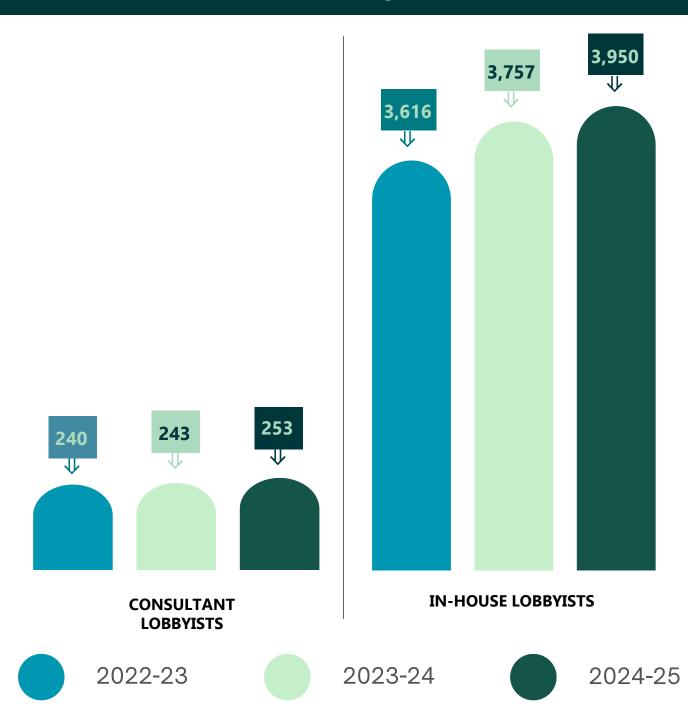


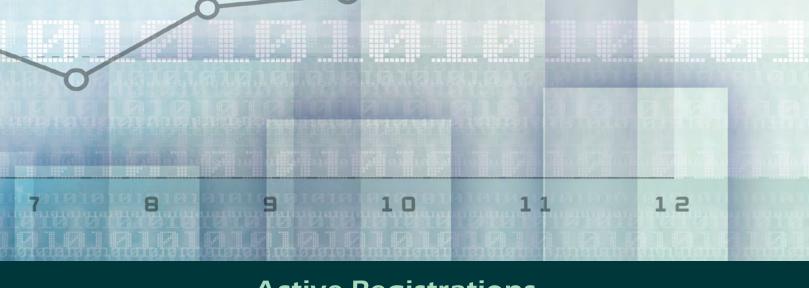
# **Compliance Statistics 2024/25**

Compliance Reviews	
Outstanding from 2023/24 fiscal year	6
New for 2024/25 fiscal year	1444
Total Reviews	1450
Information confirmed correct	12
Corrections required	748
Refuse to investigate (warning email sent as matter minor or trivial)	671
Led to investigation	9
Ongoing at end of 2024/25 fiscal year	10
Investigations	
Outstanding from 2023/24 fiscal year	8
New for 2024/25 fiscal year	9
Reconsiderations	0
Total Investigations	17
Cease to investigate	1
Compliant with Act	0
Non-compliant with Act (no penalty)	0
Non-compliant with Act (administrative penalty imposed)	5
Ongoing at end of 2024/25 fiscal year	11
Exemption Decisions	
New for 2024/25 fiscal year	1
Ongoing at end of 2024/25 fiscal year	0
Requests for Information	
2024/25 fiscal year	1760

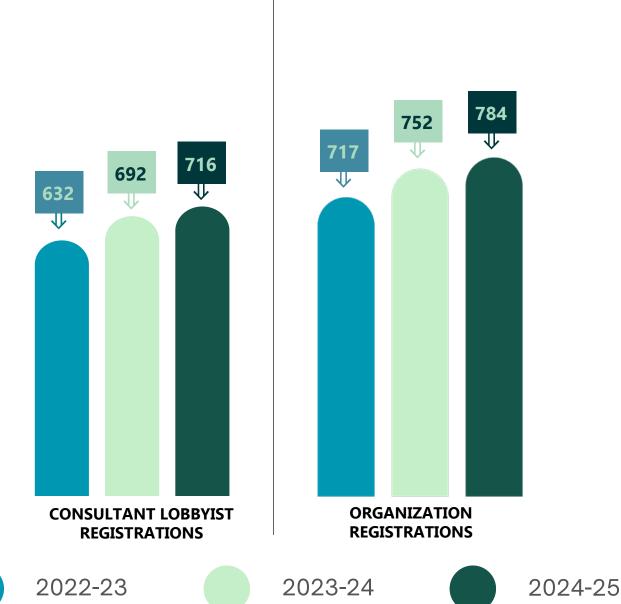
# YEAR IN NUMBERS

## **Active Lobbyists**





# **Active Registrations**









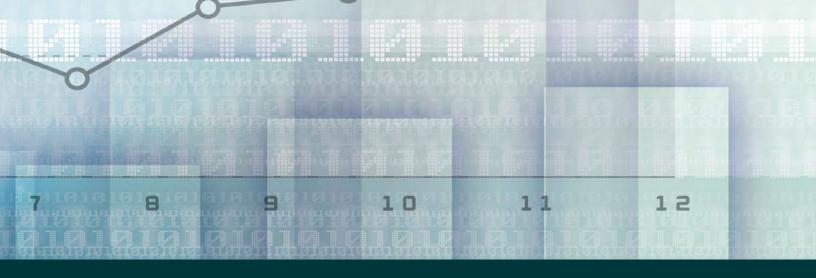
2022-23



2023-24

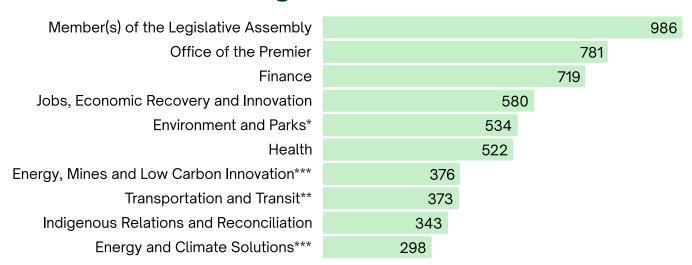


2024-25

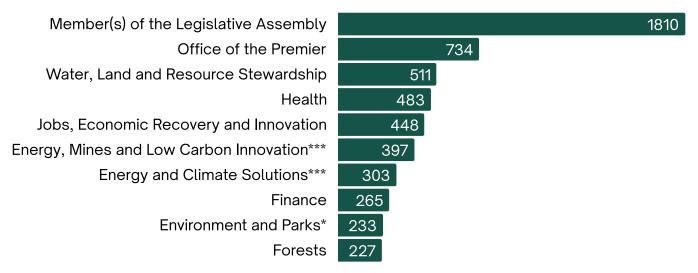


### Top 10 Lobbying Targets, 2024/25

#### **Registration Returns**



#### **Lobbying Activity Reports**



<sup>\*</sup> the Ministry of Environment and Climate Change Strategy is now the Ministry of Environment and Parks

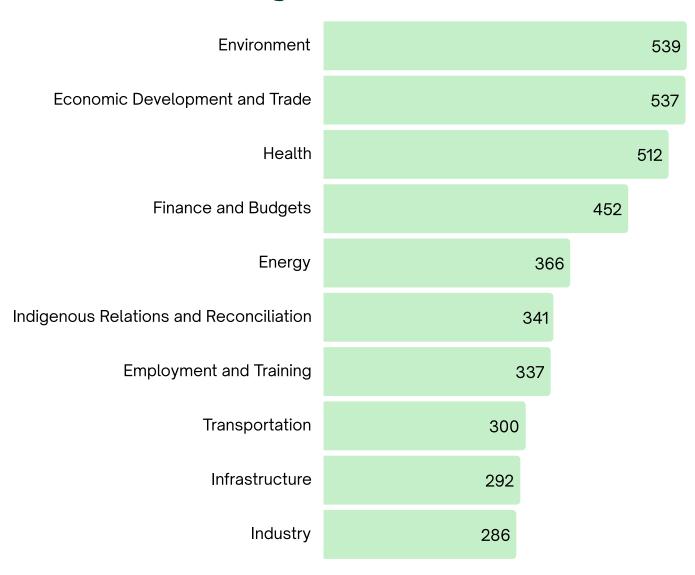
<sup>\*\*</sup> the Ministry of Transportation and Infrastructure is now the Ministry of Transportation and Transit

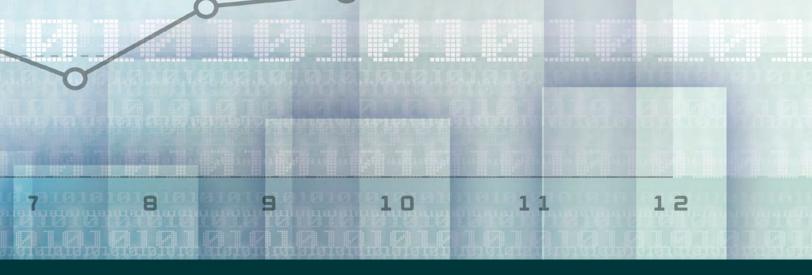
<sup>\*\*\*</sup> the Ministry of Energy, Mines and Low Carbon Innovation was restructured on November 18, 2024 and split into Energy & Climate Solutions and Mining & Critical Minerals



## Top 10 Subject Matters, 2024/25

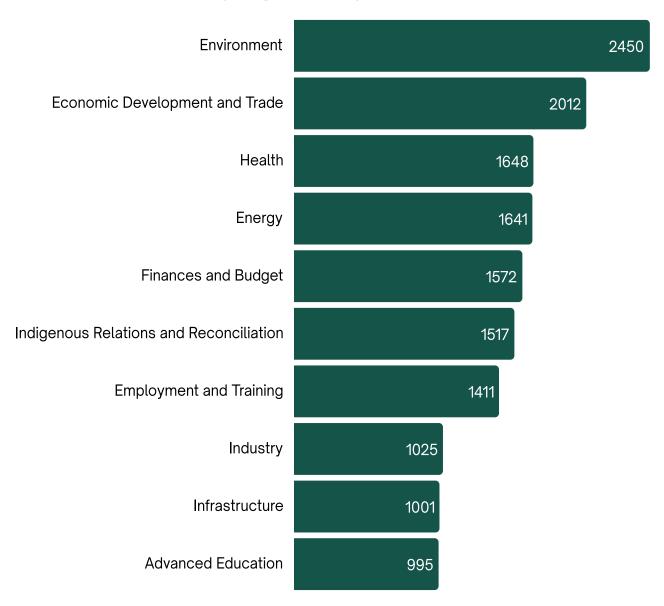
#### **Registration Returns**





## Top 10 Subject Matters, 2024/25

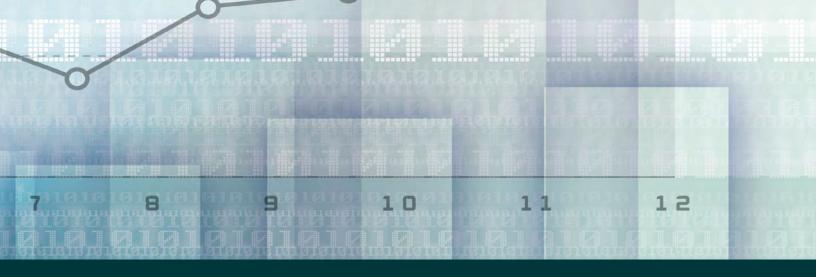
#### **Lobbying Activity Reports**





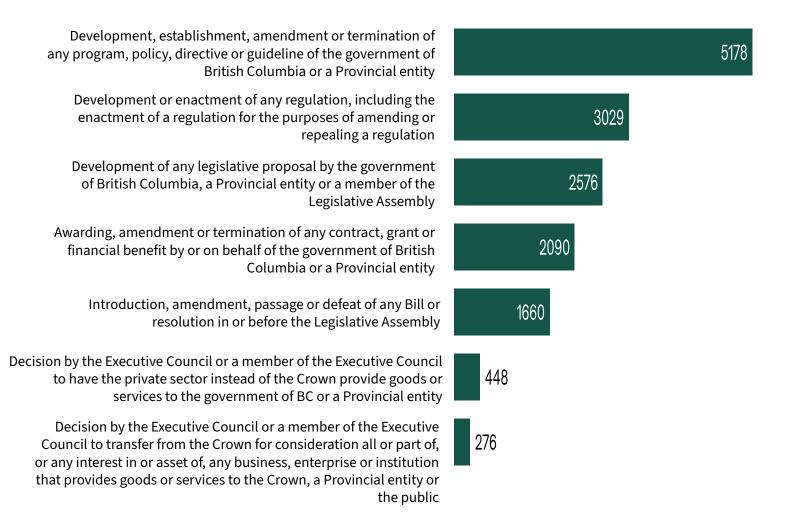
#### **Registration Returns**

Development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity			1210
Development or enactment of any regulation, including the enactment of a regulation for the purposes of amending or repealing a regulation		740	
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		687	
Development of any legislative proposal by the government of British Columbia, a Provincial entity or a member of the Legislative Assembly		627	
Introduction, amendment, passage or defeat of any Bill or resolution in or before the Legislative Assembly	409		
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 BC or a Provincial entity	131		
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	73		



## Top Intended Outcomes of Lobbyists, 2024/25

#### **Lobbying Activity Reports**







# **SERVICE PLAN GOAL 1**

Maintain and improve the Lobbyists Registry

Section 7 of the LTA authorizes the Registrar to maintain a registry of lobbying activities in BC. The Lobbyists Registry is published online and is searchable for lobbyists and the public.

The ORL is dedicated to improving the Registry by identifying and implementing improvements and updates in an ongoing manner. The aim is to make the Registry more user-friendly for lobbyists and easy for the public to search. A variety of users conduct searches of the Registry, including lobbyists, media, public office holders and their staff, and individuals and organizations that are seeking information about lobbying happening in their sector.

Improvements are identified by ORL staff as the system is administered and by receiving input and comments from lobbyists and the public. Recent enhancements to the Registry include:

- Updating the password policy to require complicated combinations including at least eight characters, both uppercase and lowercase letters, letters and numbers, and at least one special character;
- Updates to the Registry search function to add a preview of search results with pop-up links; and
- A new feature to allow designated filers to apply Code of Conduct records to other inhouse lobbyists.

The strategies outlined remain relevant to the ORL and have been maintained.



- Manage and keep current the Lobbyists Registry by identifying and implementing updates and improvements that support users, including simplifying data entry requirements for lobbyists and providing more user-friendly access for the public; and
- Maintain the Registry and its availability to lobbyists and the public every day of the year

Daufayyaanaa	202	2024/25		26/27	27/28	28/29
Performance measure	Target	Actual	Target	Target	Target	Target
Number of improvements to the Lobbyists Registry	5	5	5	5	5	5
Number of days the Lobbyists Registry is available online to lobbyists and the public	365	365	365	365	366*	365

<sup>\*</sup> This target has been updated to reflect there are 366 days in 2027/28.

# **SERVICE PLAN GOAL 2**

Educate lobbyists, public office holders, and the public about the *Lobbyists Transparency Act* 

Section 9.4 of the LTA grants the Registrar the authority to "develop and conduct public education and information designed to promote awareness and understanding of this Act." ORL education aims to assist lobbyists and the public in understanding the registration requirements under the LTA and what information is available to the public via the Lobbyists Registry. ORL education and outreach has led to a greater awareness of the rules for lobbyists in British Columbia among lobbyists, public office holders, and the public.

In 2024/25 the Registrar published two issues of our *Influencing BC* newsletter, shown in Performance Measure 3. *Influencing BC* continues to feature information about updates to the Registry, enforcement actions and other topics relevant to transparency in lobbying. *Who's Lobbying Who*, the ORL publication listing active lobbying in the past month, was published monthly as planned as shown in Performance Measure 4.

In 2024/25 the Registrar also published four new or updated guidance documents to ensure that guidance materials are responsive to the questions that are being asked of ORL staff, shown in Performance Measure 5. Guidance topics included:

- Information on the impact of the *Miscellaneous Statutes Amendment Act, 2024* on lobbying registrations;
- Lobbyists gifts and other benefits;
- Political, sponsorship, and recall contributions; and
- How to report political, sponsorship, and recall contributions in the Lobbyists Registry.

All guidance documents can be viewed on the ORL website.

In 2024/25 the Registrar and ORL staff conducted five speaking engagements to support ongoing education relating to the responsibilities of lobbyists under the LTA.

The strategies for Goal 2 remain relevant and have been maintained.

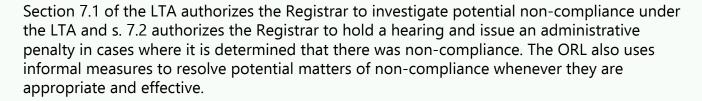
# **Strategies**

- Update and implement a communications plan to support the education plan for lobbyists, stakeholders, and the public;
- Continue publishing and circulating *Influencing BC* (the ORL's online newsletter) and monthly summaries of registered lobbying activities in the province;
- Manage and keep current the Office of the Registrar of Lobbyists website; and
- Raise awareness about the LTA among lobbyists, public office holders, and the general public, including through speaking engagements and developing guidance documents.

Performance measure		2024/25		25/26	26/27	27/28	28/29
		Target	Actual	Target	Target	Target	Target
3	Issues of <i>Influencing BC</i> published	2	2	2	2	2	2
4	Issues of <i>Who's Lobbying Who</i> published	12	12	12	12	12	12
5	Number of new or revised guidance documents to raise awareness about the LTA	10	4	10	10	10	10
6	Number of speaking engagements to raise awareness about the LTA	5	5	5	5	5	5

# **SERVICE PLAN GOAL 3**

Enhance the enforcement function under the Lobbyists Transparency Act



In fiscal 2024/25 the ORL received 98 percent of registrations on-time as shown in Performance Measure 7, up from 97 percent in 2023/24. ORL staff continue to prioritize education and outreach that supports lobbyists in registering their lobbying activities on-time.

The office conducted 1450 verifications of information in the Lobbyists Registry, just under the target shown in Performance Measure 8. Information verifications have become a primary tool for Registry staff to raise awareness about the obligations of lobbyists relating to the Lobbyists Registry and to support lobbyists in complying with the LTA. Verifications can be triggered by a registry officer's review of information submitted in the Lobbyists Registry, by scanning media reports or via information received from the public. Their utility is expected to continue to support the accuracy of information in the Registry, so performance targets for verifications of information will continue to be 1500 in coming years.

The ORL published five reports of decisions of non-compliance under the LTA in 2024/25 as indicated in Performance Measure 9. The focus of the ORL in 2024/25 continued to be raising awareness about obligations under the LTA and compliance determinations were initiated as appropriate. All reports of non-compliance can be viewed on the ORL website.

In 2024/25 one exemption decision was made by the Registrar in response to a former public office holder seeking an exemption from the two-year lobbying prohibition, shown in Performance Measure 10. Exemption requests may be submitted to the Registrar from any lobbyist that is subject to the two-year cooling-off period for former public office holders. The LTA grants the Registrar the authority to exempt a former public office holder from the two-year prohibition if the Registrar determines it is in the "public interest." All exemption decisions can be viewed on the ORL website.

The strategies continue to be relevant and appropriate and have been maintained from those published in last year's Service Plan.

# Strategies

- Analyze publicly available information sources to identify government priorities, organization priorities, and possible unregistered lobbying;
- Conduct verifications of information in the Lobbyists Registry to identify potential contraventions that proceed to formal investigation; and
- Monitor for potential non-compliance and initiate investigations and make compliance determinations as appropriate.

Performance measure		2024/25		25/26	26/27	27/28	28/29
		Target	Actual	Target	Target	Target	Target
7	Percentage of on-time registrations	95%	98%	95%	95%	95%	95%
8	Number of verifications of information in registry	1500	1450	1500	1500	1500	1500
9	Number of compliance determinations	10	5	10	10	10	10
10	Number of exemption decisions	2	1	2	2	2	2

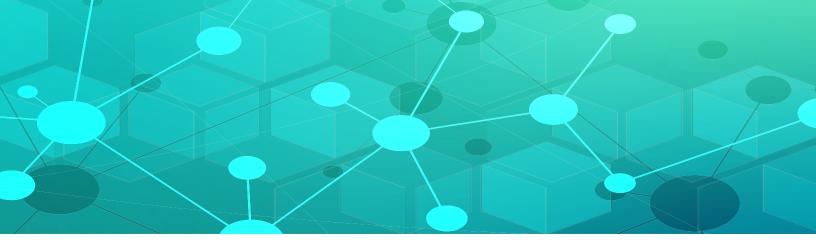


#### General

- Business relationships: Affiliates and others with an interest in lobbying activities
- Codes of conduct
- Exemption process for former public office holders
- Getting started Reference guide
- Glossary of terms
- Government funding
- Guidance for lobbyists during an election
- How to report political sponsorship and recall contributions in the Lobbyists Registry
- Lobbyist Gifts and other benefits
- Non-profit organizations
- Organizations
- Payment and reimbursement
- Political, sponsorship, and recall contributions
- Procurement
- Provincial entities
- <u>Public office holders and the *Lobbyists*</u> <u>Transparency Act</u>
- Registrar of Lobbyists: Guide to investigations
- Working together for the purpose of lobbying

#### **User Guides**

- Accessing information in the Lobbyists Registry
- Account management
- Funding returns
- How to register and report your lobbying activities
- Monthly Returns: Registration return updates and lobbying activity reports
- Quick reference guide for representatives
- Registration returns: new and reactivations
- Sample questionnaire for consultant lobbyists' clients
- Sample questionnaire for organizations that are lobbying
- <u>Tracking lobbying activities: Consultant lobbyists</u>
- <u>Tracking lobbying activities: In-house lobbyists</u>



#### **Infographics**

- Are you lobbying?
- Has the most senior paid officer in your organization changed?
- Monthly returns: What are they and when
- Registration timelines
- What do the *Miscellaneous Statutes Amendment Act, 2024*, amendments mean for my lobbying registration?
- What is a funding return?

# 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.

#### Public Interest Disclosure Act

For more information about the ORL's budget and *Public Interest Disclosure Act* (PIDA) disclosure, please see the 2024/25 OIPC Annual Report and Service Plan (page 57) at oipc.bc.ca under "Reports".

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lobbyistsregistrar.bc.ca

