

100 Hours

Advisory Bulletin

How is the 100 hour threshold calculated for in-house lobbyist?

All preparatory activities directly related to and necessary for lobbying to occur must be included in the calculation. Both conditions — directly related to and necessary for — must be met before an activity is included in the calculation of 100 hours. This definition recognizes that considerable research and internal discussions may take place before deciding whether to engage in lobbying.

Once the decision has been made to lobby, all of the activities that take place to plan, organize, staff, develop, undertake and monitor the lobbying activity must be included in the 100 hours calculation.

The 100 hours equates to approximately 12.5 eight-hour days.

Once an organization has reached 100 hours, the obligation to register **all** in-house lobbyists arises — the calculation is not 100 hours per individual or 100 hours per subject matter. The 100 hours relates to the hours spent collectively within the organization preparing to lobby or lobbying on any matter.

It is not necessary to calculate each activity to the minute. It is necessary to keep track, as

prudently and reasonably as possible, of the time spent in activities that are directly related to and necessary for lobbying.

Types of activities that could be directly related to and necessary for lobbying to occur may include (among other things):

- researching and writing reports, letters, submissions and other correspondence to be given to a public office holder;
- deciding which public office holders to target;
- setting up meetings with public office holders for the purpose of lobbying;
- lobbying by letter, email, phone or in person;
- time spent negotiating contracts for services related to the lobbying strategy;
- time spent by service providers working on behalf of the organization to develop aspects of the lobbying strategy, for example, graphic designers;
- developing and gaining internal approval for a lobbying strategy and budget;
- hiring and training staff to lobby; and
- monitoring and adjusting the strategy.

Activities that likely would **not** be included in the calculation are those that predate the actual decision to lobby and could include time spent (among other things):

- researching an issue and developing positions;
- gathering information and data in the process of developing a position; and
- internally discussing issues that later become the subject of lobbying activities.

The calculation of the 100 hours includes time spent by **all** employees and persons employed by or on behalf of the organization preparing to lobby and lobbying. However, only those **chiefly responsible** for lobbying, for example the head of the organization, government relations staff or the executive, must be listed as in-house lobbyists.

For example, it is not necessary to list receptionists as in-house lobbyists when they set up meetings with public office holders, although the time they spend setting up those meetings is factored into the 100 hours. Nor is it necessary to list administrative assistants as in-house lobbyists when they proofread a document for submission to a public office holder, although the time they spend proofreading is factored into the 100 hours.

For the initial registration, the calculation starts when the organization employs one or more individuals who, alone or collectively, spend 100 hours preparing to lobby or lobbying on any matter.

When the time comes to re-register, it is necessary to look back at the previous 12-month period and determine whether any individuals in the organization, alone or collectively, lobbied 100 or more hours during that period. If so, it is necessary to re-register. If not, the registration may be allowed to lapse. If any individuals in the organization decide to lobby again at some point in the future, the calculation of the 100 hours begins once again when they make the decision to lobby.