

COMMISSIONER'S NOTICE

NOTICE N^o 2012-02

LOBBYING ACTIVITIES CARRIED OUT ON BEHALF OF THE CLIENT OF A COLLEAGUE

The subject-matter of lobbying activities carried out on behalf of the client of a colleague must be registered in the registry of lobbyists.

This notice is intended to clarify the status of persons carrying out lobbying activities on behalf of the client of a colleague, or any other person working for the same firm or enterprise.

Any person, whether or not a salaried employee, whose occupation or mandate consists in whole or in part of lobbying on behalf of another person in return for compensation is a consultant lobbyist within the meaning of the *Lobbying Transparency and Ethics Act* (R.S.Q., c. T-11.011) and the subject-matter of these lobbying activities must be recorded in the registry of lobbyists.

Some firms and enterprises recruit people for their knowledge of the workings of provincial and municipal governments, their expertise, or their contacts. Such people are often hired as strategic advisors to assist the firm or enterprise. In such a context, they may, on occasion, be called on to communicate with public office holders when lobbying on behalf of the client of a colleague.

The fact that the client of a colleague is not the direct client of the person communicating with the public office holder has no bearing on the status of this situation: from the moment this person communicates with a public office holder with a view to influencing a decision in favor of a colleague's client, and compensation has been given or due in exchange for such services rendered, he or she must be considered a consultant lobbyist. Consequently, such lobbying activities must be registered in the registry of lobbyists and the third party must be considered, under Section 9 of the Act, his or her client.

The same principle applies to other people working for the same firm or enterprise who are called on to carry out specific lobbying activities with public office holders on behalf of a client of a colleague.

Under this notice, the term "colleague" includes any and all people working for the same firm or enterprise.

François Casgrain
Lobbyists Commissioner