



April 26, 2007

The Honourable Vic Toews P.C., M.P.  
President of the Treasury Board  
L'Esplanade Laurier, 9<sup>th</sup> Floor, East Tower  
140 O'Connor Street,  
Ottawa, Ontario, K1A 0R5

Dear Minister,

**re: Regulations under the *Lobbying Act***

I am writing to you today on behalf of the Canadian Conference of the Arts (CCA) to express concerns about the development of the regulations associated with the Federal Accountability Act (FAA) and the Lobbying Act.

The CCA is the oldest and most broadly based forum for arts and culture in Canada. An umbrella organization of arts organizations and industries, its membership totals up to over a quarter of a million artists, creators and professional culture workers from all disciplines and all corners of the country.

The CCA has recently learned the period for consultations on the regulations associated with the FAA and the Lobbying Act has been compressed to a two-week period. When the Act was passed, the Government indicated that there would be extensive and substantive consultation as the regulations were being developed. Today, the CCA joins with other nonprofit organizations in expressing our concerns over this accelerated process.

The CCA fully accepts the need for greater accountability for the use of public funds. It also endorses the findings of the Blue Ribbon Panel on Grants and Contributions which noted that "not only is it possible to simplify administration while strengthening accountability, it absolutely necessary to do the first in order to ensure the latter."

The CCA is concerned that the reporting requirements which will be detailed in the regulations will impose yet another unnecessary burden on small nonprofit organizations that interface with government and Parliamentary officials on an ongoing basis. In the case of the CCA, the Secretariat and President routinely appear before Parliamentary Committees or bodies such as the CRTC and participate in discussions with senior government officials.

Elaborate reporting requirements will certainly increase the workload on the small and overburdened staff of organizations such as the CCA.

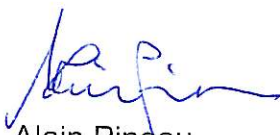
As you are aware, the legislation makes no distinction between contact with government that occurs at the request of government or Parliament and that, which is initiated by the registered organization or interest. It was the hope of the CCA that the regulations would clarify and simplify the reporting requirements associated with activities initiated by government or Parliamentary officials.

The FAA is an incredibly complex and important piece of legislation that will have a profound impact on relations with government, Parliament and civil society organizations such as the CCA. It is our hope that you will ask extend and broaden the consultation process for the FAA to ensure that the government is able to achieve the goals identified in the report of the Blue Ribbon Panel on Grants and Contributions, as well as the broader objectives of greater accountability. It is a delicate balance to be sure, however, the capacity of nonprofit organizations to continue to contribute to the public policy discourse is worth the extra effort on the part of the drafters of the regulations. It is with these objectives in mind that we also fully support the letter on the same topic sent to you by Imagine Canada on April 25, 2007.

The CCA would welcome an opportunity to discuss this matter with you or your officials or to meet with those currently engaged in drafting the regulations to bring the FAA into force. While the need to move forward is certainly appreciated, the need to do so with sensitivity and coherence with the report of the Blue Ribbon Panel cannot be overstated.

On behalf of the members of the CCA, I thank you in advance for your attention to these concerns.

Yours sincerely,



Alain Pineau  
National Director

Cc Hon. Bev Oda, Minister of Canadian Heritage and the Status of Women