

September 22, 2014

Delivered by Fax (416-869-4322)

Michael Cooke, Editor
Toronto Star
1 Yonge Street
Toronto, ON M5E 1E6

Dear Mr. Cooke:

Re: Martin Regg Cohn: Why Dalton McGuinty is lobbying for a living (Monday September 22, 2014).

On behalf of the Public Affairs Association of Canada (PAAC), a professional association representing over 150 public affairs practitioners across Canada, I write to take issue with a number of the claims made by Mr. Cohn.

First, lobbying is a completely legitimate activity and it is key to the development of sound public policy. All legislation across the world that regulates the activity of lobbyists recognizes this fact.

Lobbyists are an integral part of the government decision making process and add value through:

- Advising clients on how to navigate complex decision making processes of government;
- Providing government policy makers information on the impacts of proposed courses of actions on various constituencies;
- Informing organizations on lobbying disclosure and registration legal requirements; and
- Advising on the kinds of public policy analysis that government requires to inform its decision making.

Second, Mr. Cohn simply alludes that Ontario's lobbying registration and disclosure rules are inadequate. The federal five year restriction is one option but not widely supported by other provincial jurisdictions in Canada (one to two year cooling off periods are the norm).

Third, lobbying is not about "opening doors" or trading on government contacts. Government officials are typically skeptical recipients of advocacy by lobbyists of any description, especially former colleagues. Since government decision making on policy



PAAC

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matters is a complex process with many points of contact with various conflicting audiences—media, interest groups, opposition parties, think tanks, other governments—influencing policy direction requires working with many institutions and officials beyond any one person’s reach. Effective lobbyists know this and work with their clients to develop policy solutions to problems that work for government and not against it. The goal is to develop mutually beneficial solutions to policy problems confronting government that serves both the public interest and the needs of various organizations interacting with government.

In summary, the PAAC believes that Ontario’s lobbying registration and disclosure laws are excellent. And lobbying, when done effectively, works to enhance public policy not undermine it.

Sincerely,

PUBLIC AFFAIRS ASSOCIATION OF CANADA

A handwritten signature in black ink that reads "John Capobianco". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

John Capobianco
President
PAAC