



July 31, 2017

The Honourable Corey Tochor  
Speaker of the Legislative Assembly of Saskatchewan  
Room 129, Legislative Building, 2405 Legislative Drive  
Regina, SK S4S 0B3

Dear Mr. Speaker:

I have the pleasure and honour to present to you the *Annual Report of the Conflict of Interest Commissioner and Registrar of Lobbyists* for the period of April 1, 2016 to March 31, 2017.

This Report is submitted pursuant to Section 25 of *The Members' Conflict of Interest Act*, Chapter M -11.11, Statutes of Saskatchewan, 1993.

Yours respectfully,



Ronald L. Barclay, Q.C.  
Saskatchewan Conflict of Interest Commissioner  
and Registrar of Lobbyists

## Table of Contents

Commissioner and Registrar’s Message .....	3
Mandates .....	4
<b>Saskatchewan Conflict of Interest Commissioner</b>	
Obligations of Members .....	7
Advice from the Commissioner .....	8
Public Disclosure .....	9
Gifts .....	11
Opinions Provided .....	12
Education and Outreach .....	14
<b>Office of the Registrar of Lobbyists</b>	
History .....	16
Registry Update .....	17
Website Update .....	19
Communications and Outreach .....	20
Compliance .....	22
Recommendations.....	23
<b>Office</b>	
Financial Statement .....	26
Audited Financial Statements .....	28



## COMMISSIONER AND REGISTRAR'S MESSAGE

Ronald L. Barclay, Q.C  
Saskatchewan Conflict of Interest Commissioner  
and Registrar of Lobbyists

It is an honour and privilege to submit my sixth annual report as the Office of the Conflict of Interest Commissioner for the Province of Saskatchewan. This report also includes a summary of activities for the Office of the Registrar of Lobbyists.

It has been a very busy year for both offices. When the lobbyist registry was launched in August 2016, we had already commenced a major communications and education campaign. We continue to provide guidance and advice to lobbyists and other stakeholders.

As the Conflict of Interest Commissioner I dealt with some challenging issues as Members of the Legislative Assembly consulted with me seeking opinions and advice. It is a tribute to all MLA's that they are proactive in seeking guidance.

You will observe changes in this report from last year. As the two offices evolve we strive to remain progressive in the service provided. This report is evidence of that mandate.

I would be remiss if I did not pay tribute to my Deputy Registrar of Lobbyists, Sandra Arberry. I am grateful for her advice and candor as well as her insights, professionalism and sensibility. Our achievements could not have been possible without her dedication. She has made an immense contribution as Deputy Registrar.

I look forward to another successful year.

## MANDATES

The Legislative Assembly is assisted in its duties by many officers who fulfill a variety of roles. These include the Officers of the Legislative Assembly who assist the Legislative Assembly in making government accountable and responsive to the public. These officers help to monitor government spending, assist individual citizens with concerns about their treatment by government entities, protect the interests of children, receive concerns about the release of government information and other privacy matters, and help Members of the Legislative Assembly avoid conflicts of interest.

Since 1993, Members of the Legislative Assembly of Saskatchewan have been governed by legislation regarding their conduct as members. *The Members' Conflict of Interest Act* includes specific prohibitions regarding conflicts of interest and the use of insider information. It regulates member participation in government contracts, and provides general disclosure requirements for all members.

In 2014, *The Lobbyists Act* established that the Conflict of Interest Commissioner would also serve as Saskatchewan's Registrar of Lobbyists.

### Conflict of Interest Commissioner

The Commissioner performs a variety of roles under the Act. One such role is that of assisting members in understanding their obligations under the Act.

To assist in the understanding of their obligations the Commissioner may provide written advice or recommendations. The Commissioner is also available to meet with members to clarify this advice when requested or required.

Each year, members must complete and file a confidential disclosure statement with the Commissioner. From the detailed private disclosure statement, the Commissioner prepares public disclosure statements. The public disclosure statements are deposited with the Clerk of the Legislative Assembly and are available for public inspection.

After filing a private disclosure statement, the member and, if available, the member's spouse must meet with the Commissioner to ensure that adequate disclosure has been made and to obtain advice on the member's obligations under the Act.

The Commissioner may determine that the advice and recommendations provided to individual members have a broader general application and may therefore provide the advice as guidelines to all members.

The Commissioner may also conduct investigations and inquiries under the Act.

In essence, it is the responsibility of the Commissioner to ensure that each member of the Legislative Assembly maintains a high standard of ethical conduct.

### Registrar of Lobbyists

In August 2016 the Saskatchewan lobbyists act came into force. In accordance with the legislation, Ronald L. Barclay, the current Conflict of Interest Commissioner, also oversees *The Lobbyists Act*.

The Office of the Registrar of Lobbyists is responsible for designing, implementing, and operating the province's lobbyist registry; promoting and educating the general public, stakeholders, and the lobbyist community about *The Lobbyists Act*; and ensuring compliance and conformity of lobbyists to *The Lobbyists Act*.

The Registrar provides directions to lobbyists and may conduct investigations if there is reason to believe one is necessary to ensure compliance with the Act. The Registrar also has the authority to level an administrative penalty up to \$25,000 on those who are found to be in breach of the Act.

# SASKATCHEWAN CONFLICT OF INTEREST COMMISSIONER



## OBLIGATIONS OF MEMBERS

Persons elected to the Legislative Assembly of Saskatchewan are subject to statutory obligations designed to avoid any conduct that may constitute a conflict of interest on the part of the member. These statutory obligations are set forth in *The Members' Conflict of Interest Act* (the Act).

Members are prohibited from using information that they have acquired as Members of the Legislative Assembly and which is not available to the general public, for the purpose of advancing their private interests, or the private interests of a family member or associate.

Additionally, a member must not use his or her position to influence other decision makers to advance the private interest of the member, his or her family or an associate.

Members are prevented by statute from accepting, except in specific circumstances, any gifts or benefits offered to them in respect to carrying out of the member's duties.

## ADVISING MEMBERS

The Commissioner's primary role is that of an advisor to members. He encourages all members to consult with him at the earliest possible opportunity if they have questions or concerns about their obligations so that a potential conflict of interest can be avoided.

Requests for opinions come in various forms. Members may have an informal conversation with the Commissioner, or may make a formal request for a written response. After inquiry and research, the Commissioner provides an opinion as to whether there is a conflict. If a member has or may have a conflict of interest, the Commissioner can make recommendations specifying a timeframe for compliance.

---

*Under the Act all of the Commissioner's opinions and recommendations are confidential unless released by the Member or with the Member's consent.*

---

It is critical to observe that the Commissioner's mandate only extends to current Members of the Saskatchewan Legislative Assembly.

## ADVICE FROM THE COMMISSIONER

The role of Conflict of Interest Commissioner is varied and challenging. I echo the comments of my colleague, The Honourable David J. Wake, Integrity Commissioner for Ontario, which he made in his 2015-2016 annual report:

“Although [I] can rely on my many years of experience in fielding conflict of interest inquiries, the discipline of ethics is not a static one. Attitudes and opinions on an issue can change over time and some issues are relatively recent, such as the appropriate use of social media.”

Throughout this past year members have sought the Commissioner’s advice on a variety of matters including the acceptance of gifts and sponsored travel, attendance at or participating in events, and business and financial interests. Advice sought can generally be placed within the following categories:

### Gifts

Questions about gifts include whether they can be received, under what circumstances, and what value of gifts can be accepted.

### Outside Activities

Questions regarding outside activities deal with volunteer board activities in community organizations, sponsoring charitable events and attendance at events.

### Business and Financial interests

Questions around investments relate to blind trusts, business dealings, and personal investments made by the member or his/her family.

### Family

Questions regarding family members involve a myriad of issues including the employment or activities of a spouse, child or other family members.

### Taking part in decisions

Members often seek advice on whether it is appropriate to participate in a decision before the Legislative Assembly, the Executive Council or one of their respective committees.



## PUBLIC DISCLOSURE

In Saskatchewan, within 90 days after an election and every year by March 31 while they are a member, each member must file a **Member's Private Disclosure Statement** with the Commissioner.

---

*The disclosure requirements are the same for all Members.*

---

Once the private disclosure statement has been filed with our Office, the member (and spouse if available) meets with the Commissioner to discuss their obligations under the Act. This annual meeting with the Commissioner is required for all members.

Beginning in March 2016 the Commissioner received private disclosure statements from all 61 members and from April to June met with each member personally to discuss his or her disclosure.

This meeting with the members helps develop a good working relationship between the Commissioner and the members. It permits the Commissioner to raise any issues he may have concerning the member's private disclosure statement and to ensure that the information is accurate and complete.

After meeting with the member, a **Member's Public Disclosure Statement** is prepared. This statement contains all relevant information provided by the member (and spouse if applicable) as set out in the legislation. These statements are filed online and a hard copy resides with the Office of the Clerk of the Legislative Assembly. By law Member's Public Disclosure Statements are filed with the Clerk of the Legislative Assembly prior to June 30.

It is critical to observe that the Commissioner was satisfied that each member was aware of his or her statutory obligations to avoid actual or perceived conflicts of interest in the carrying out of their legislative and executive responsibilities, and each was desirous of observing the letter and spirit of the Act.

I wish to reiterate a comment made by Paul Fraser, Q.C., Conflict of Interest Commissioner for the Province of British Columbia in his 2015 annual report:

“In the work [I] have done for the last 25 years, the fundamental presumption has not been that corruption and evil exists and may go undetected – but rather that those who seek and attain high office do so for the right and honourable reasons and should have access to obtaining advice to protect against their private interests conflicting with their public responsibility.”

“I would like to [commend] the hundreds of MLAs who have lived by and respected the rules, in the public interest. It is that record of compliance and cooperation by people of conscience, dedication, and integrity that has enhanced the reputation and utility of this office.”

I wish to express my appreciation to Ron Samways who assisted me in respect to my duties as Commissioner and in particular my responsibilities to the filing by members of their Private Disclosure Statement and preparation of the Public Disclosure Statements. He also arranged my meetings with the members. His contributions were immense and my achievements could not have been possible without his assistance.

## GIFTS

Every year I circulate to all members a booklet called “Accepting and Disclosing Gifts: A Guide for Members”. This booklet provides examples of instances when it is appropriate or inappropriate for an MLA to accept gifts and/or benefits. As to when a member can accept gifts is an ongoing concern.

The legislation provides that members are permitted to accept only those gifts or benefits that are received as an incident of protocol, customs or social obligations that normally accompany the responsibilities of office. This applies to gifts given to the member either directly or indirectly. In the absence of protocol, custom or social obligation, the gift is not allowed under section 7 of the *Act*.

---

*The legislation prescribes that all gifts received with a value over \$200 must be disclosed. However, in order to be transparent, the office encourages members to disclose all gifts regardless of their value.*

---

Members should avoid circumstances where a reasonable person might conclude that the gift or benefit given was intended to influence the member in carrying out his or her duties.

***In general, members should ask themselves this question when offered a gift or benefit:***

- 1. How is this gift connected to my responsibilities as a Member?***
- 2. Can the gift or benefit reasonably be seen to be given to influence me in the exercise of my official responsibilities of office (either as a Member or Minister)?***
- 3. Is there an expectation that I will do something for the donor in return?***

As a result of the general provincial election held on April 4, 2016 there were 17 newly elected members. I met separately with the new members of both the SaskParty and the NDP and made a presentation outlining their responsibilities under the Legislation.

## OPINIONS PROVIDED

The subject of gifts has been an important issue amongst my colleagues. It's advantageous in Saskatchewan that the Conflict of Interest Commissioner is also the Registrar of Lobbyists as the two mandates intersect in a number of areas, with the receiving of gifts being one example.

As a number of members were first elected on April 4, 2017 I had many inquiries regarding gifts. I was comforted that the new members take their duties seriously and consulted with me to ensure they are in compliance with the Act. Examples of their inquiries are:

1. A number of members were offered tickets to concerts.

These tickets were not being offered for any official function they had or were to perform. Further, the donor had official dealings with the Government; therefore the tickets could not be accepted.

2. Around Christmas it is not unusual for members to receive gift baskets as a token of appreciation from constituents or associations.

I did permit members to accept these gifts only if the value was under \$200.00 as in most cases they were not received as incidents of protocol.

3. A few members were presented with gift cards as tokens of appreciation for their appearance at an official event.

These gift cards were presented as a token of appreciation for the members participation and in my view acceptance of the gift cards was deemed appropriate.

4. Sponsored travel - I have given opinions in respect to sponsored travel.

Sponsored travel means travel on a commercial, non-commercial or private aircraft at a reduced rate or at no cost. Sponsored travel is generally prohibited, unless there is no alternative. Generally, a member may accept sponsored travel if required to take part in a genuine “fact-finding event” related to carrying out their official duties.

5. Attending charitable events - often members get invited to attend at charitable events with the cost of registration or admission being paid by the sponsor.

If the organization or company offering to pay the fee does business or is regulated by the government then the acceptance of payment is not permissible. However, any decision on this issue would be dependent on the surrounding facts and if the donor is not doing business with the government it would be appropriate to accept the payment. In other words, a member would be accepting an invitation to a charitable event as a social obligation

## EDUCATION

In September of 2016 the Commissioner attended the annual conference of the Canadian Conflict of Interest Network (CCOIN) which took place in Edmonton, Alberta.

CCOIN is comprised of the various ethics and conflict of interest commissioners across the country at the federal, provincial and territorial levels of government and primarily those who have jurisdiction over members of legislative bodies.

The organization meets on an annual basis to discuss issues of common interest and to seek the advice and view of colleagues concerning matters related to conflicts of interest and ethics. Presenters included David Jones, Q.C who spoke about solicitor-client privilege issues arising during investigations, and Dr. Martin Ferguson-Hall from Peter Lougheed Leadership College who spoke on Ethics in Leadership.

## OUTREACH

This year the Commissioner and his staff met with Legislative interns who have been selected for the Saskatchewan Legislative Internship Program. The interns attended at the Office of the Conflict of Interest Commissioner and discussion centered on his mandates, his responsibilities and a summary of the work and opinions he generally provides. It was a valuable experience for both the Commissioner and the interns.



Office of the  
Registrar of Lobbyists  
Saskatchewan

## HISTORY

The Saskatchewan Lobbyists legislation came into force August 23, 2016.

The purpose of *The Lobbyists Act* is to enhance the integrity and accountability of government by fostering openness and transparency about who is attempting to influence decisions made by provincial public office holders.

The Saskatchewan legislation defines lobbying in a manner consistent with the definition in other provinces. In order to be considered lobbying there must be:

- a) Communication with;
- b) A public office holder, by;
- c) A person who is paid to conduct the communication;
- d) In an attempt to influence a government decision or outcome

In Saskatchewan lobbying may be done by consultant lobbyists or in-house lobbyists. If you are characterized as a lobbyist you must create an account on the Lobbyist Registrar's website and then regularly disclose details of your lobbying activities with provincial public office holders by registering this information on the lobbyists' registry. This information becomes available to the public as soon as it has been accepted by the Registrar.

It is critical to underscore that to lobby is an integral part of the democratic process and to lobby public officer holders is a legitimate activity in a democratic system of free and open access to government.

---

*The legislation only extends to public office holders at the **provincial level**. Municipal and federal public office holders are not covered by our Act.*

---



## REGISTRY UPDATE

During the planning and development stage it was estimated that the Saskatchewan registry would see approximately 200 active lobbyists with 400 active registrations over the next five years. This number was derived using existing lobbyist numbers from Manitoba and Alberta and taking into account our population, economic factors and potential stakeholders.

As of March 31, 2017 the registry had approximately 450 active lobbyists and 172 active registrations.

One of the interesting by-products the registry provides is a summary of issues that are currently topical in the province and Saskatchewan's business environment.

In the Resource Library section on our website there is a "registry reports" tab. Under this tab are a number of reports the public can access which provides a quick summary of what is in the registry. These reports include the lobbying of ministers, members, and government institutions. It also reflects the most popular subject matters.

### **Ministers most Lobbied in their capacity as Members of the Executive Council As of March 31, 2017**

Minister	Responsible Ministry	Times mentioned
Jeremy Harrison	Economy	85
Brad Wall	Executive	77
Kevin Doherty	Finance	56
Jim Reiter	Health	51
Scott Moe	Environment	49

**Members most Lobbied in their capacity as MLA  
As of March 31, 2017**

<b>Member of Legislative Assembly</b>	<b>Times mentioned</b>
Trent Wotherspoon	45
Ken Cheveldayoff	43
Bill Boyd	40
Brad Wall	40
Gordon Wyant	40

**Most common areas of interest Lobbied on as of March 31, 2017**

<b>Subject matter</b>	<b>Times mentioned</b>
Economic Development	75
Finance & Budget	55
Environment	53
Health	50
Energy	48

Overall, the reception on the design and accessibility of the registry has been positive. Lobbyists report that the process of registering their activities is easily facilitated and the prompts provided throughout each step are helpful and not difficult to understand.

As the Office moves forward there are a number of improvements we wish to consider including design elements and additional reports. This would make the registry experience more fulsome and effective.

We are pleased with the registry design. We would be remiss in not thanking the developer, Engineered Code Consulting, along with our two Business Advisors, Scott Emery and Paul Borchardt for the valuable services provided.

## WEBSITE UPDATE

The Lobbyist website was launched on June 1, 2016.

We worked closely with a local company, Amplify Digital Marketing, to create a contemporary and engaging website. The design advice and suggestions made by Amplify Digital were invaluable and very much appreciated.

We are pleased with the website and it has been well received by our stakeholders.

Since its launch in June 2016 until March 2107 we have had over 6,000 visits to the site, mostly from Canada but also from other countries.

Country	Sessions	% New Sessions	New Users
	<b>6,218</b> % of Total: 100.00% (6,218)	<b>48.07%</b> Avg for View: 48.05% (0.03%)	<b>2,989</b> % of Total: 100.03% (2,988)
1. <a href="#">Canada</a>	<b>5,378(86.49%)</b>	46.34%	2,492(83.37%)
2. <a href="#">United States</a>	<b>422(6.79%)</b>	59.48%	251(8.40%)
3. <a href="#">Russia</a>	<b>154(2.48%)</b>	4.55%	7(0.23%)
4. <a href="#">(not set)</a>	<b>74(1.19%)</b>	90.54%	67(2.24%)
5. <a href="#">United Kingdom</a>	<b>29(0.47%)</b>	89.66%	26(0.87%)
6. <a href="#">Italy</a>	<b>21(0.34%)</b>	100.00%	21(0.70%)
7. <a href="#">Brazil</a>	<b>20(0.32%)</b>	100.00%	20(0.67%)
8. <a href="#">India</a>	<b>14(0.23%)</b>	100.00%	14(0.47%)
9. <a href="#">China</a>	<b>12(0.19%)</b>	83.33%	10(0.33%)
10. <a href="#">France</a>	<b>10(0.16%)</b>	100.00%	10(0.33%)

## COMMUNICATIONS AND OUTREACH

Communication to our stakeholders was undertaken prior to the implementation of the registry in order to create awareness of the legislation, the public registry of lobbyists and lobbying activities, and the rights and responsibilities of each stakeholder. Once the registry was implemented and available for public access, communication focused on educating and training stakeholders on how to use the registry.

We entered into an agreement with Praxis Consulting to develop a communications strategy that prescribed three main goals and objectives:

- To create awareness among, and educate the public and stakeholders across jurisdictions about the new legislation
- To educate our stakeholders on the value, benefits and use of the registry
- To provide clear, consistent and regular messages to all stakeholders

The first goal was attained by publishing advertisements in all the Saskatchewan newspapers and in professional publications in the Western Provinces. In June 2016 the Office mailed out over 500 letters and a brochure to potential lobbyists and organizations. In July/August the Registrar was interviewed by a reporter of the Regina Leader Post to facilitate an understanding of the legislation and launch of the Registry.

Our second goal was accomplished through face-to-face presentations and meetings, news releases and further media opportunities. For the launch of the Registry on August 23, 2016 the Office held a press conference at the Legislative Assembly and invited over 20 news outlets to attend. A press release and information package was provided to members of the media who could not be there. In addition, the Registrar gave a number of interviews with the following message:

“Lobbying is an integral part of the democratic process and to lobby public office holders is a legitimate activity in a democratic system of free and open access to government.”

The Registrar held a presentation on lobbying with both caucus offices and the deputy ministers. The Deputy Registrar also made presentations to various organizations in Regina and Saskatoon.

The legislation does not place any responsibility on public office holders in respect to meeting with lobbyists so it is deserving of commendation that a large number of

ministries requested presentations. Knowledge and awareness of the lobbying legislation and registry can only serve the public.

As the Office moves from the implementation of the registry to the monitoring phase, the focus of communication will shift from education to compliance. This shift means our broader communication strategy will change as we provide direction and outreach specifically to lobbyists and potential lobbyists.

## COMPLIANCE

It is the responsibility of each lobbyist to ensure he or she is compliant with the Act and to register his or her activities in the lobbyist registry.

Throughout the past year the Office has received many calls from organizations and stakeholders seeking clarification and information. As part of our communication strategy, we have attempted to ensure lobbyists understand the legislation and in particular, how to register. To date, we have focused on education and communication. It is critical that lobbyists have an understanding of the legislation in order to ensure that they observe the letter and spirit of the Act.

Timely reporting to the registry is an essential part of meeting these obligations. I concur with a comment made by my colleague Karen Shepherd, the Federal Commissioner of Lobbyists, when she states “[Late reporting of communications with designated public office holders hinders transparency.](#)”

As previously stated, the purpose of the Act is to enhance the integrity and accountability of government by fostering openness and transparency about who is attempting to influence decisions made by provincial public office holders.

Now that the legislation has been in effect for one year the Office will move from implementation, which focused on education, to concentrate on compliance by ensuring lobbyists are properly registered in accordance with the legislated requirements.

## RECOMMENDATIONS

Prior to the Lobbyist legislation being proclaimed in August 2016 the Standing Committee on Intergovernmental Affairs and Justice made the following recommendation in respect to legislative reviews:

“The committee is confident that the administrator of the Act would advise Members of the Legislative Assembly if and when any revisions to the legislation would be required”

Given that *The Lobbyists Act* has only been in effect since August 23, 2016 it may be premature to make a final recommendation as to whether legislation should be reviewed. However, the Commissioner does have some concerns with the 100 hour threshold in respect to in-house lobbyists and the exemption for non-profit organizations.

1. Remove the 100 hour threshold for in-house lobbying

Under the legislation an in-house lobbyist who is an employee, officer or director of a corporation, must register once the organization collectively reaches a threshold of 100 hours of lobbying per annum.

Although the government of Saskatchewan emphasized the fact that the Provinces of British Columbia, Alberta and Manitoba have similar provisions as to the 100 hour threshold other provincial jurisdictions along with the Federal government have more stringent requirements.

Furthermore, the Lobbyist Registrars in both Alberta and British Columbia have each made representations to their governments to review the 100 hour threshold.

The concerns I have are as follows:

1. The two types of lobbyists are not treated equally in the Act. Consultant lobbyists are always required to register their activities.

In-house lobbyists on the other hand are required to register only after they have met the 100 hours threshold. This creates a two-tier system.

2. Although some in-house lobbyists register immediately to demonstrate transparency or because it is easier to register than to account for lobbying hours while other in-house lobbyists in the same industry will not register because the

legislation does not require it to do so. **In my view this undermines transparency and is confusing to the public.** \*\* per submission by Lynn Morrison, [former] Lobbyist Registrar of Ontario to Ontario

Government, November 24, 2014.

3. A great number of in-house lobbyists will not require 100 hours to achieve their company or employers interests and therefore will never reach the 100 hour requirement.

The whole purpose of the lobbyist's legislation is to enhance the integrity and accountability of government by fostering openness and transparency about who is attempting to influence decisions made by provincial public office holders.

The 100 hour threshold that permits lobbying to go undisclosed is not in keeping with the purpose of the Act, which is to promote transparency. It is quite feasible for a company to achieve their mandate with far less than 100 hours of lobbying by an in-house lobbyist.

I am concur with the comments of Guy Giorno, an Ottawa lawyer who specializes in lobbying and public accountability, while speaking about the Saskatchewan Lobbyists legislation he stated:

**"It's quite possible for companies to achieve their goals with less than 100 hours of lobbying. The current 100 hour threshold means the public has, to some degree, no knowledge of who, if anyone has paid to influence which decisions.**

**We just know that the more information that's out there, the more people know what's going on, the more things are open, the better off we are and the more confident we can be in our institutions."**

The 100 hour threshold was necessary prior to the pre-internet age when registering as a lobbyist was complicated and time consuming. Today, the Saskatchewan on line registry is designed to accommodate a small business with few resources to register within minutes and at no cost.



## 2. Require non-profits to register

It is concerning that when large nonprofit organizations have paid employees engaged in lobbying and are not required to register under the Act because they are exempt (section 4(1)(i)), it does not provide transparency. In many cases lobbying is the main purpose of the association.

I am therefore of the view that the current exemption section 4(1)(i) should be revisited.

In order to answer this concern one suggestion would be that only charitable nonprofit associations that have 5 or less lobbyists would be exempt from registering unless those individuals lobby for more than 30 or more hours a year.

Therefore, if the association has 5 or more lobbyists it would not be exempt from registering and the associations would be subject to the same registration provisions that apply to for profit entities.

Furthermore, nonprofit associations that do not have a charitable mandate who have paid employees who lobby for any amount of time would also not be exempt from lobbying regardless of the number of lobbyists they employ.

If these amendments are enacted it would promote transparency as it would require all nonprofit associations except for the smaller entities to register.

It is critical to underscore that the process to register has been simplified. We have a modern system which results in fast data retrieval for public searches. The simple search function retrieves results in seconds. Furthermore, the registration process is without cost to those registering online.

This recommendation is consistent with the position taken by the Alberta Registrar in respect to their submission to the Alberta government.

## **FINANCIAL STATEMENT**

The fiscal year for the office runs from April 1, 2016 – March 31, 2017.

The Commissioner is always conscious of expending public funds and strives to conduct the administration of this office in an efficient and economical manner.

During the fiscal year the Office was under budget by \$60,000. This is due primarily to revisiting the decision to hire additional staff, finding efficiencies within the organization and the deferment of minor projects in respect to the lobbyist registry.

Financial transactions are subject to audit by the Office of the Provincial Auditor.



July 31, 2017

### Responsibility for the Financial Statements

The accompanying financial statements are the responsibility of the Office of the Conflict of Interest Commissioner and Registrar of Lobbyists (Office). The financial statements have been prepared in accordance with the Canadian public sector accounting standards.

The Office maintains appropriate systems of internal control, including policies and procedures which provide reasonable assurance that the Office's assets are safeguarded and that financial records are relevant and reliable.

The Provincial Auditor of Saskatchewan conducts an independent audit of the financial statements. Her examination is conducted in accordance with Canadian generally accepted auditing standards and includes tests and other procedures which allow her to report on the fairness of the financial statements.



Ronald L. Barclay, Q.C.  
Saskatchewan Conflict of Interest Commissioner  
and Registrar of Lobbyists

(insert audited financial statements here)