

June 10, 2014

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Lieutenant Governor of Ontario

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Chief Executive Officer
Garry Pruden

City Clerk
Councillors, City of Toronto

Re: Notice of Motion

We are writing to express our serious concerns with the notice of motion from Deputy Mayor Norman Kelly, seconded by Councillor John Parker, which would both end the exemption for non-profits from the requirement to register with the Lobbyist Registrar, and also require "grassroots campaigns" to register with the Registrar.

This proposed change would have a very significant negative impact on the capacity of the non-profit community sector to communicate with both Councillors and city staff on issues of concern to them. It also has potential to curtail civic engagement to a degree that would impede the operation of civil society in Toronto, and could well be found to be in contravention of the Canadian Charter of Rights and Freedoms. Beyond the concerns of legally incorporated non-profit organizations and trade unions, we are also deeply concerned regarding the potential impact of this change on residents associations and other local community members organizing – at what point does something become a "grassroots campaign" – is it when two neighbours agree they should call their Councillor about a speedbump? Three neighbours? Ten?

When it was first proposed to extend the requirement to register with the Lobbyist Registrar in 2008, non-profit community organizations worked with the Registrar (Marilyn Abraham and subsequently Linda Gehrke) to ensure that there was an understanding of the challenges that this change would entail. It quickly became clear that including non-profits would be cumbersome, expensive for both the City and the affected organizations, and ultimately likely unworkable. As a result of that process, the Registrar and City Executive supported the exemption of non-profits from the Registry, confirming this exemption in 2008.

If City Council is to seriously entertain ending this exemption, we would urge you to give thorough consideration to the financial and legal implications of such a decision, not to mention the ramifications for civic engagement and the effective operation of the community sector in Toronto. This proposal is of concern not only in Toronto, but for the precedent it could set across the province, and its potential impact on the over 46,000 non-profit community organization that comprise the sector in Ontario.

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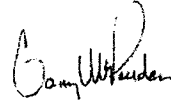
Non-profit community organizations continue to be happy to work with City Council, the Lobbyist Registrar, and other city staff to ensure transparency, accountability, and responsiveness of our sector in its dealings with all levels of government. We would encourage City Council to approach the proposed changes with caution and due deliberation, as we believe that they pose a very real threat to the positive relationship between the city and the thousands of non-profit and community organizations that comprise civil society in Toronto.

Many thanks for your consideration of our concerns.

Sincerely,



David Layton
President



Garry Pruden
Chief Executive Officer

DL/GP/kb