

mm 52.8.11

Wednesday, June 10, 2014

Councillors, City of Toronto

Re: Notice of Motion MM52.8 – Requirement to Register with the Lobbyist Registrar's Office

Dear Councillors,

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 officials 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 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.

Non-profit community organizations continue to be more than willing to work with City Council, the Lobbyist Registrar, and other city staff to ensure the 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. At the very least, we request that this matter be referred to Executive Committee in order that there can be some opportunity to address our serious concerns with this motion.

Many thanks for your consideration of this request.

Sincerely,

John Campey, Executive Director
Social Planning Toronto

Maura Lawless, Executive Director
519 Church St. Community Centre

Axelle Janczur, Executive Director
Access Alliance Multicultural Health and Community Services

Lee Soda, Executive Director
Agincourt Community Services Association

Amanda Dale, Executive Director
Barbara Schlifer Clinic

Devon Ostrom
BeautifulCity.ca Alliance

Penny Reid, Board Chair
Birchmount Bluffs Neighbourhood Association

Brownstones of Soho Residents Association

Mulugeta Abai, Executive Director
Canadian Centre for Victims of Torture

Theresa McClenaghan
Canadian Environmental Law Association

Steve Lurie, Executive Director
Canadian Mental Health Association, Toronto Branch

Carolyn Davis, Executive Director
Catholic Crosscultural Services

Elizabeth Forestell, Executive Director
Central Neighbourhood House

Moy Wong-Tam, Executive Director
Centre for Immigrant and Community Services

May Lui, Executive Director
Chinese Canadian National Council – Toronto Chapter

John Wilson and Jude MacDonald
CodeBlueTO

Garry Pruden, Executive Director
Community Living Toronto

Aina-Nia Grant, Associate Executive Director
Community Microskills Development Centre

Mario Calla, Executive Director
COSTI Immigrant Services

Gene Desfor
Professor Emeritus, Faculty of Environmental Studies, York University

Gail Nyberg, Executive Director
Daily Bread Food Bank

Kim Fraser, Executive Director
Davenport Perth Neighbourhood Association

Kate Stark, Executive Director
Dixon Hall

Marion Newrick, Executive Director
Community Action Resource Centre

Garry Pruden, Executive Director
Community Living Toronto

Margaret Hancock, Executive Director
Family Service Toronto

Grange Community Association

Duberlis Ramos, Executive Director
Hispanic Development Council

Julie Mathien, President
Huron-Sussex Residents Association

Sue Dexter
Harbord Village Residents Association

Hydro Block Tenants Association

Mary Marrone, Director of Advocacy and Legal Services
Income Security Advocacy Centre

Faduma Mohamed, Executive Director
Labour Community Services

Diana Walter, Executive Director
Margaret's Housing and Community Support Services

Maya Roy, Executive Director
Newcomer Women's Services

Maureen Lynett
No Casino Toronto

Anshul Kapoor
NOJetsTO

Shelley Zuckerman, Executive Director
North York Community House

Sharad Kerur, Executive Director
Ontario Non Profit Housing Association

Paul MacLean, Chair
Palmerston Area Residents Association

Nancy Henderson, Executive Director
Parkdale Community Legal Services

Dave Meslin
Ranked Ballot Initiative of Toronto

Fatima Filippi, Executive Director

Rexdale Women's Centre

Maureen Fair, Executive Director
St. Christopher House

Liane Regendanz, Executive Director
St. Stephen's Community House

Kevin Lee, Executive Director
Scadding Court Community Centre

Scenic Toronto

Jennifer Hunter, Chair
Seaton Village Residents Association

Sharon Allen-Elliot, Executive Director
Second Base Youth Shelter

Suranna Sandy, Executive Director
Skills for Change

Kripa Sekhar, Executive Director
South Asian Women's Centre

John Cartwright, President
Toronto and York Region Labour Council

Melissa Carroll, Executive Director
Toronto Aboriginal Support Services Council

Susan Wright, Director of Operations
Toronto Arts Council

Franz Hartmann, Executive Director
Toronto Environmental Alliance

Gary Pieters, President
Urban Alliance on Race Relations

Kwame McKenzie, CEO
Wellesley Institute

Cynthia Wilkey, Chair
West Don Lands Committee

Cynthia DuMont, Executive Director
West Scarborough Neighbourhood Community Centre

Jasmine Tehara, Board Chair
Woodgreen Community Services

Michael Creek,
Working for Change

Marcie Ponte
Working Women Community Centre

Mike Rasmussen, Chair
York Quay Neighbourhood Association

Heather McGregor, CEO
YWCA Toronto

c.c. City Clerk, City of Toronto
Lobbyist Registrar, City of Toronto

*Social Planning Toronto
2 Carlton Street, Ste 1001,
Toronto ON M5A 2V8
416-351-0095
info@socialplanningtoronto.org*