

# Toronto Nonprofit Network

May 2, 2016

Dear Mayor Tory and Councillors,

We are writing to you to relay concerns regarding item EX 13.2 on this week's Council agenda, proposing that the City consider including nonprofit community organizations in the City of Toronto's lobbyist registry processes.

We have polled nonprofit networks and organizations across our city, and have had the following concerns identified to us by close to one hundred nonprofit leaders and volunteers across Toronto:

- Community nonprofit organizations work for the betterment of their communities and our city. This is inherent in their mission and objectives. They are, by definition, not engaged in lobbying efforts to secure contracts for personal profit, and should not be included in accountability processes that were designed to provide transparency regarding for-profit lobbying and powerful interests in our city. Including nonprofits in the lobbying registry will needlessly divert valuable energies of community organizations and volunteers to promote community wellbeing.
- Community organizations act to amplify the voices and power of individuals and groups of residents who typically have much less power and influence in the life of our city. In this way, community organizations are an essential affirmative action tool that our city needs to counter-balance inequities and exclusions in the dynamics of our democracy. Curtailing this participation is contrary to the City's commitments to equity and inclusion.
- Community associations and organizations are in place to respond to the concerns of the community residents they support and work with. Relaying community-identified issues and concerns to elected officials and policy-makers is an essential part of these organizations' civic engagement role, and should be classified in the same way as constituents' regular communications with their governments, to inform policy and practice.
- Small and medium community organizations who intermittently contact their local councillors regarding community issues will not have the time and capacity to formally register as lobbyists and keep up with the filing demands on an ongoing basis. Given the other pressing community issues and demands that they are attending to, along with ever increasing administrative and reporting requirements, many organizations will simply have to vacate this civic engagement role.
- Many nonprofit associations have no paid staff, and their dedicated volunteers are routinely engaged in communicating on policy issues and ideas with councillors and city officials on behalf of their membership/constituency's interests. A critical policy engagement function of these organizations will be impossible to sustain for the volunteers leading these organizations. They simply will not have the capacity to comply with the lobbyist registry requirements, and their engagement in community discussions will effectively be silenced.
- There is no practical way to implement the lobbyist registrar systems with nonprofits that receive funding from the City of Toronto. These community organizations are required to report to the City about their project activities as part of their current accountability commitments, and would not be able to do so in the future without registering as lobbyists, and updating files every single time they initiated communication, and shared project reports with City grants staff.

- The work of nonprofits is complementary and supportive to local government. The nonprofit sector works in partnership with city government - delivering local services to residents, providing sport and recreation opportunities, creating a creative and vibrant city for the arts. Hearing from these partners and the people they work with in communities helps the city serve its residents. It is not “lobbying”.

What Resident Associations are saying...

“Further regulating and restricting access that community groups have to our ward Councillors and other city officials by amending the Lobbyist By-law treating volunteer community groups in the same way as private lobbyists is absolutely the wrong approach for the City of Toronto. Our associations maintain open dialogue with our elected Councillors and we strive to maintain collaborative relationships to meet our common goal of bettering our community.”

“We respectfully request that instead of throwing up more road blocks and increasing red tape and costs for volunteers that diminish the value of our contribution, City Council expend their energy seeking ways to support their volunteer network and enabling us to increase and improve our efforts as key partners in delivering valued services to our citizens.”

We are deeply concerned about the potential impact of the proposed motion, and are also troubled by the fact that it has emerged with no stated justification. The inclusion of nonprofit organizations in the lobbyist registry process was considered fully by staff when the registry was set in place, and Council made the proper decision to exempt nonprofit organizations from these requirements. There is no apparent public interest being served to revisit this decision.

We urge you to vote against this motion, and to instead affirm and support the essential civic engagement role that nonprofit community organizations play in the wellbeing of our city, and its democratic processes.

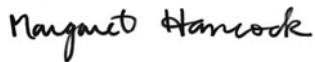
Sincerely, on behalf of the Toronto Nonprofit Network,



Sean Meagher, executive director, Social Planning Toronto



Duberlis Ramos, executive director, Hispanic Development Council



Margaret Hancock, executive director, Family Service Toronto,  
and chair of the City-Wide Agency Network



Rob Howarth, Toronto, executive director, Toronto Neighbourhood Centres



Liz Rykert, Co-founder, Shape My City

cc City of Toronto Clerk