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**Interpretation Bulletin #8**  
**Issued July 3, 2012**

***Grass-roots communication registration requirements***

**PURPOSE**

This bulletin elaborates on the meaning of “grass-roots communication” and clarifies that paid lobbyists involved in grass-roots communication projects are required to register even if their activities do not include direct communication with public office holders.

**TYPES OF LOBBYISTS TO WHICH THIS BULLETIN APPLIES**

- consultant lobbyists
- in-house lobbyists (organizations)
- in-house lobbyists (persons and partnerships)

**LEGISLATION**

This Interpretation Bulletin considers the following provisions of the *Lobbyists Registration Act, 1998* (“LRA”):

- 1(1) “grass-roots communication”;
- 4(4)14;
- 5(3)15;
- 6(3)14

**INTERPRETATION**

Lobbyists are required to disclose all techniques of communication used to lobby, expressly including “grass-roots communication” (paragraphs 4(4)14 [consultants]; 5(3)15 [persons and partnerships]; and, 6(3)14 [organizations]).

Grass-roots communication is defined as

appeals to members of the public through the mass media or by direct communication that seek to persuade members of the public to communicate directly with a public office holder in an attempt to place pressure on the public office holder to endorse a particular opinion.

An example of grass-roots communication is a campaign that uses any combination of advertising, web-site(s) or social media tools to encourage members of the public to communicate with public office holders. Examples of communication directly with public office holders are letters, emails, contact via a social media tool (e.g. posting, direct messaging, tweeting), texting, phone calling, in-person demonstrations.

Lobbyists engaged in developing and/or managing grass-roots communication campaigns may not have direct communications with public office holders on behalf of their client (in the case of consultant lobbyists) or their employer (on behalf of in-house lobbyists). Because the lobbyist is not involved in direct communication, this may lead to the incorrect conclusion that registration is not required. In fact, registration may be required.

The Registrar has determined that individuals who are, for payment, engaged in developing and/or managing grass-roots communication campaigns on behalf of a client are consultant lobbyists and accordingly, required to register this activity.

In the case of in-house lobbyists, the Registrar has determined that time spent developing and/or managing grass-roots communication campaigns must be included when determining whether registration is required. (See “Interpretation Bulletin #3 – Am I an in-house lobbyist?”)

#### **AUTHORITY**

*This Interpretation Bulletin is provided pursuant to section 15 of the Lobbyists Registration Act, 1998. It is intended solely to provide information and is not intended to be a substitute for the advice of counsel. The Bulletin is not a binding statement of how the legislation will be interpreted or applied in a particular circumstance. Final interpretation of the law is the responsibility of the courts.*

#### **HISTORY OF THIS BULLETIN**

This Interpretation Bulletin was issued by Lobbyists Registrar Lynn Morrison on July 3, 2012.

#### **DO YOU NEED MORE INFORMATION?**

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