

**What is Grassroots Communication?**

**Interpretation**

*The Lobbyists Act* 2(1)(g):

**. . . .**

(g) “grassroots communications” means:

 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.

**Summary:** Grassroots communication is an indirect form of communication with public office holders. Lobbyists using this technique may need to register their activities even if their activities do not include direct communication with public office holders.

**Directive:**  Grassroots communication may use any means, including advertisements, website(s) or social media tools to encourage members of the public to communicate with public office holders directly through any means including letters, email, social media tools, text, phone or in-person demonstrations.

In accordance with Interpretation Bulletins issued in other jurisdictions, the Registrar directs that any time spent managing grassroots communications is considered time spent communicating with public office holders and is thus lobbying. Managing grassroots communications includes, but is not limited to, directing a campaign, making initial or ongoing decisions about the message of the campaign, or making decisions about the techniques to be used.

I echo the comments of the Integrity Commissioner of Ontario where she states in her Bulletin dated July 3, 2012 and amended July 1, 2016;

 “The reporting regime is intended to be comprehensive and transparent to ensure the Canadian public knows who communicates with public office holders and which interests they represent”.

Accordingly, any individual who for payment, manages a grassroots communication campaign on behalf of a client is a consultant lobbyist and is required to register this activity.

Any employee or paid director who spends time managing a grassroots campaign on behalf of an entity would be required to register once the 100 hour organizational threshold has been reached.

**Authority:**

This Directive is issued by the Registrar of Lobbyists pursuant to section 17 of *The Lobbyists Act.*