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Standing Committee on Access to Information, Privacy and Ethics
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Government Relations Institute of Canada (GRIC) Submission
ETHI Review of the *Lobbying Act*

Executive Summary:

The *Lobbying Act's* ("*Act*") preamble states the following:

> *WHEREAS free and open access to government is an important matter of public interest;*
> *AND WHEREAS lobbying public office holders is a legitimate activity;*
> *AND WHEREAS it is desirable that public office holders and the public be able to know who is engaged in lobbying activities;*
> *AND WHEREAS a system for the registration of paid lobbyists should not impede free and open access to government;*

The preamble explicitly affirms that lobbying is a legitimate and essential component of a healthy democratic system – one that contributes to informed public decision-making while safeguarding free and open access to government.

The *Act's* central objective is balance: promoting transparency and accountability without impeding the ability of Canadians, organizations, and stakeholders of all sizes to engage meaningfully with public office holders. This principled approach distinguishes Canada's framework from jurisdictions that lack comprehensive lobbying legislation or rely on voluntary, fragmented, or uneven disclosure systems.

Against this backdrop, given the robustness of Canada's existing framework, any amendments to the *Act* should be guided by proportionality and evidence. Reforms that prioritize meaningful transparency and clarity will best preserve the openness, accessibility, and democratic engagement that the *Lobbying Act* was designed to protect. GRIC's recommendations are grounded against such a backdrop.

GRIC recommends:

I. Amending the *Lobbying Act* to define “significant part of duties” as 32 hours or more, collectively, of one or more individuals’ time spent lobbying during a four-week period, and subsequently amending paragraph 10.11(1)(b) to mirror the “significant part of work” language used in paragraph 10.11(1)(c), thereby harmonizing the limited exemptions from post-employment lobbying prohibitions applicable to corporations to organizations as well.

II. Maintaining sections 6 and 9, and sections 7 and 10, of the *Lobbying Registration Regulations* to preserve the current requirement that only oral communications, arranged in advance and initiated by a lobbyist, are reportable, and that only designated public office holders (“DPOH”) be identified in monthly communication reports.

III. Amending section 10.11 of the *Lobbying Act* to reduce the post-employment prohibition on lobbying for former designated public office holders from five years to four years, aligning the restriction more closely with provincial and international practice and to correspond to the duration of a full parliamentary mandate.

IV. Amending the *Lobbying Act* to better define when a consultant lobbyist must definitively register, in order to bring clarity to subsection 5(1).

V. Amending the *Lobbying Act* to restore clarity, proportionality, and alignment with Parliament’s intent as it relates to the *Lobbyists’ Code of Conduct*.

VI. Amending subsections 7(3) and 7(6) of the *Lobbying Act* to extend the requirements applicable to in-house lobbyists to members of boards of directors of corporations and organizations who are remunerated for their board service, while excluding individuals who serve in a volunteer capacity and receive only nominal stipends or reimbursement of reasonable expenses.

Introduction

1. The Government Relations Institute of Canada (GRIC) is pleased to file these comments with respect to the above noted “Statutory Review of the *Lobbying Act*.”

2. Established in 1994, GRIC is a national, not-for-profit association representing government relations and public affairs professionals from across all sectors of the economy. GRIC’s membership includes consultant and in-house lobbyists from national trade associations, NGOs and private companies (both domestic and multinational), extending across the breadth and depth of the Canadian economy.

3. As a starting point to this submission, it is important to acknowledge that Canada already operates under one of the most rigorous, transparent, and enforceable federal lobbying regimes in the world. GRIC’s submission is grounded in this reality.

4. GRIC's recommendations are intended to constructively enhance the *Lobbying Act* and its regulations by improving clarity and transparency where warranted, while cautioning against reforms that would impose additional regulation without meaningfully improving public transparency, accountability, or trust.

5. In light of the strength of Canada's existing lobbying regime, any legislative amendments should be grounded in proportionality and evidence. Reforms should focus on enhancing meaningful transparency and regulatory certainty, rather than introducing duplicative reporting requirements or addressing compliance issues, for which there is no clear evidence, in order to preserve the openness, accessibility, and democratic engagement underpinning the *Lobbying Act*.

Recommendation I: Amending the *Lobbying Act* to define "significant part of duties" as 32 hours or more, collectively, of one or more individuals' time spent lobbying during a four-week period, and subsequently amending paragraph 10.11(1)(b) to mirror the "significant part of work" language used in paragraph 10.11(1)(c), thereby harmonizing the limited exemptions from post-employment lobbying prohibitions applicable to corporations to organizations as well.

6. Corporations and organizations (i.e., in-house lobbyists) are required to register under the *Lobbying Act* when communications with public office holders constitute a "significant part of the duties" of one or more employees (see paragraph 7(1)(b)).

7. The challenge is that neither the *Lobbying Act*, nor its regulations, define what constitutes a "significant part of duties." As a result, this critical statutory threshold has been left to administrative interpretation through guidance issued by the Office of the Commissioner of Lobbying ("OCL"). In July 2025, the long-standing interpretation of this phrase was abruptly reduced by 75%, when the current OCL redefined the threshold as **just 8 collective hours over a four-week period**, down from the previous 32-hour standard that had been applied since 2009.

8. Importantly, there were no sustained calls from the public, nor from public office holders themselves, to reduce the existing 32-hour threshold. Moreover, the OCL's own Annual Reports over many years have not identified "shadow lobbying" (i.e., lobbying activity exceeding the threshold without registration) as a systemic or widespread problem. For example, in the OCL's most recent Annual Report, of the only 25 preliminary compliance assessments initiated across the federal lobbying regime as a whole, only one was ultimately referred to the RCMP.[1] Of the seven cases that involved the potential for shadow lobbying, all were closed due to "no evidence that a significant part of duties was met."[2]

9. Lowering the in-house registration threshold significantly expands the regulatory reach of the OCL with limited corresponding transparency benefits. Specific impacts include:

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[1] Office of the Commissioner of Lobbying of Canada, "*Annual Report 2024-25"* (July 2025).
[2] Ibid.

- **Increased regulatory burden on smaller corporations and organizations that engage in limited or infrequent lobbying.** Many small businesses may be unaware that minimal engagement with the government now triggers registration obligations, exposing them to compliance risk and potential penalties. Others may choose to refrain from engaging with the government altogether due to the administrative burden of registration.

- **Expansion of activities counted toward the threshold**, **including "grassroots communications."** The new Interpretation Bulletin defines grassroots communications far more broadly than the *Lobbying Act* itself, capturing communications directed at the general public rather than public office holders. Activities such as seeking public support for legislative change, criticizing existing policy, or encouraging citizens not to re-elect a Member of Parliament could now be counted toward the threshold, despite falling outside the *Act's* statutory definition.

- **Further constraints on former Designated Public Office Holders (DPOHs)**. The lower threshold tightens practical restrictions during the five-year cooling-off period for former DPOHs employed in corporations or organizations. These individuals may now be limited to fewer than eight hours per month not only of direct lobbying, but more consequently of any preparatory or supportive work, making post-public service employment in the private or non-profit sectors more difficult and less attractive.

10. In the absence of evidence demonstrating a compliance gap, the revised interpretation appears instead to advance the OCL's stated objective of moving toward "registration by default." The OCL has publicly advocated for eliminating the "significant part of duties" test altogether and replacing it with a regime in which *any* amount of lobbying interactions – even a single conversation by one employee – would automatically trigger in-house registration.

11. A registration-by-default model risks over-inclusiveness, unnecessary administrative burden, and dilution of the registry's transparency value by equating routine operational communications with meaningful lobbying activity. The OCL itself acknowledged that such a regime risks undermining the principles of the *Lobbying Act*:

> "***This change could, however, increase the administrative burden of complying with the Lobbying Act for smaller corporations and organizations that engage in limited amounts of lobbying or that lobby on an infrequent basis. This would be contrary to one of the principles set out in the preamble to the Lobbying Act, which requires that the 'system for the registration of paid lobbyists should not impede free and open access to government***."[3]

12. Even under the now historical 32-hour interpretation, Canada already operates one of the most stringent in-house lobbying registration regimes among comparable democracies in the G7. The new 8-hour threshold places Canada at the extreme end of the international spectrum.

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[3] Office of the Commissioner of Lobbying of Canada, *Improving the Lobbying Act: Preliminary Recommendations* (February 2021).

13. For instance, the United Kingdom and Australia do not require registration for in-house lobbying at the national level; the statutory need to register applies only to consultant lobbyists.[4] The United States applies a far narrower test, requiring the simultaneous satisfaction of three thresholds: more than one lobbying contact, lobbying constituting over 20% of an employee's time over a three-month period, and a minimum expenditure threshold.[5] France uses a hybrid trigger for in-house lobbying: either lobbying constitutes a principle activity (>50% of working time over six months) or is conducted regularly (>10 lobbying contacts with covered officials over 12 months).[6]

14. By contrast, the 8-hour standard captures limited, episodic engagement with government officials. Re-aligning Canada's "significant part of duties" test with a 20% or 32-hour monthly benchmark would better reflect international norms and the original policy intent of the *Lobbying Act*: to capture sustained and material influence activity, not incidental or peripheral engagement.

15. Providing the central role "significant part of duties" plays in determining who must register as an in-house lobbyist, GRIC is of the view that Parliament – not the OCL – should determine its definition and threshold. In this way, any changes to the meaning of the phrase would occur only through Parliamentary amendment, while the Commissioner of Lobbying – an independent Agent of Parliament – would fulfill their important role of enforcing the law, not defining it.

16. The significant part of duties threshold is also important in terms of its impact on the five-year prohibition on lobbying, specifically for corporations – for the moment. Currently, the *Act* allows former designated public officer holders to engage in limited in-house lobbying on behalf of corporations as long as such lobbying does not amount to a "significant part of their work" (which follows the significant part of duties threshold). This same allowance, however, does not apply to former designated public officer holders to engage in in-house lobbying on behalf of *organizations.* As the OCL itself has pointed out:

> **"*There is no readily apparent explanation in the parliamentary record to justify why the five-year prohibition ought to be applied differently depending on whether a former designated public office holder engages in in-house lobbying activities on behalf of a corporation rather than an organization*."**[7]

17. Amending paragraph 10.11(1)(b) to mirror the "significant part of work" exemption in paragraph 10.11(1)(c) is essential to resolve this fundamental inconsistency in the application of post-employment lobbying prohibitions. The current disparity creates an arbitrary advantage for corporations and undermines the *Act's* goal of equitable regulation.

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[4] Office of the Registrar of Consultant Lobbyists, "*FAQ*" *https://registrarofconsultantlobbyists.org.uk/faqs/* and the Australian Government Register of Lobbyists, https://www.ag.gov.au/integrity/australian-government-register-lobbyists

[5] Lobbying Disclosure Act Guidance, https://lobbyingdisclosure.house.gov/ldaguidance.pdf

[6] High Authority for Transparency in Public Life, *"What is a Lobbyist?"* *https://www.hatvp.fr/en/high-authority/regulation-of-lobbying/list/#who-is-a-lobbyist-ri*

[7] Office of the Commissioner of Lobbying of Canada, *Improving the Lobbying Act: Preliminary Recommendations* (February 2021).

18. For example, why should a former DPOH be able to do limited lobbying work for a corporation, but not be allowed that same privilege with a charity, industry association or non-profit? Harmonizing the language would ensure all entities – whether corporate or organizational – adhere to the same standard, fostering fairness and reducing regulatory confusion.

19. Critically, this amendment preserves the *Act's* ethical core while allowing for practical flexibility. The "significant part of work" threshold maintains a robust barrier against undue influence by prohibiting substantial lobbying involvement, yet it permits incidental engagement that does not compromise public trust. This balanced approach ensures DPOHs can transition to private roles without overly burdensome restrictions, while safeguarding against conflicts of interest.

Recommendation II: Maintaining sections 6 and 9, and sections 7 and 10, of the *Lobbying Registration Regulations* to preserve the current requirement that only oral communications, arranged in advance and initiated by a lobbyist, are reportable, and that only designated public office holders be identified in monthly communication reports.

20. As part of the OCL's preliminary recommendations to ETHI (February 2021), there was a proposal to amend the *Lobbyists Registration Regulations,* **Sections 6 & 9,** to require the expansion of monthly communication reports so that registered lobbyists must report *all* oral communications with public office holders, whether arranged in advance or not.

21. Amending these sections of the *Regulations* to achieve this outcome would remove the conditions that only communications that are "arranged in advance" and "initiated" by a lobbyist, need to be reported. In turn, *any* oral communication with a public office holder – even a spontaneous encounter at a reception or on the street in Ottawa – would require to be reported by a registered lobbyist as part of their monthly communications reports.

22. Importantly, it would also mean that public office holders would need to recall such interactions, given that the OCL audits 5% of all communications that are reported by lobbyists to ensure accuracy. If Members of Parliament, for instance, are asked to verify the details of a reported but 'unarranged' oral communication, this would mean that MPs now have to initiate the practice of recording every interaction with a lobbyist – that is if they even know they are speaking with a lobbyist in the first place. If that same MP has not recorded such an interaction, OCL would presumably blame the lobbyist for filing a false report.

23. Fundamentally, public office holders should continue to have the authority to decide who they choose to meet with. Eliminating "arranged in advance" from the criteria for a lobbyist communication report would result in public office holders being held accountable for participating in discussions that they did not consent to. Maintaining the requirement that reportable communications be both oral and pre-arranged is essential to preserving a system that is transparent and workable. These criteria ensure that only meetings intentionally organized to discuss a specific subject matter – clearly understood by both the lobbyist and the public office holder – are captured.

24. Expanding the regime to include every spontaneous interaction would not meaningfully improve transparency; instead, it would flood the system with low-value reports, obscure the truly substantive communications, and impose unnecessary burdens on both lobbyists and public office holders. Government decisions are not shaped by chance encounters, and the reporting system should remain focused on what actually matters: deliberate, substantive discussions that influence policy.

25. Similarly, with respect to **Sections 7 & 10** of the *Regulations* – which specify what must be reported following an oral communication – the OCL has proposed that all participants in the meeting on the government side, whether or not they are a designated public office holder or not, be reported. On the civil service side, this would require listing every participant, from a junior policy analyst all the way up to a Deputy Minister, on each communication report. The current requirement – to report only designated public office holders, typically Assistant Deputy Minister level and above, along with members of the Senate and House of Commons, ministers, and ministerial staff – reflects a practical and evidence-based understanding of how decisions are actually made.

26. Senior officials and political decision-makers hold the authority to influence or direct policy. Expanding the reporting requirement to include every junior participant would not improve transparency; it would only dilute the focus of the system, add unnecessary administrative burden, and distract from tracking engagement with those who truly shape government decisions.

Recommendation III: Amending section 10.11 of the *Lobbying Act* to reduce the post-employment prohibition on lobbying for former designated public office holders from five years to four years, aligning the restriction more closely with provincial and international practice and to correspond to the duration of a full parliamentary mandate.

27. Canada's current five-year post-employment lobbying prohibition for designated public office holders under Section 10.11 of the *Lobbying Act* is among the most stringent within the OECD and the entire world.[8] While this reflects a strong commitment to ethical governance, it diverges significantly from provincial and international norms.

28. Beyond the ethical dimension, such a lengthy restriction can affect post-public service career mobility, particularly for highly skilled leaders and technical experts whose experience is most valuable in the private and non-profit sectors. A five-year ban may also discourage top talent from entering public office altogether due to the potential career opportunity cost, or may delay the transfer of expertise back into the broader economy.

29. To be clear: GRIC fully supports the need for a federal cooling-off period, but it should be balanced and better aligned with provincial counterparts and international practice.

[8] OECD. “Lobbying in the 21st Century: Transparency, Integrity and Access (2021).

30. For instance, provincial and territorial lobbying regimes across Canada include post-employment lobbying restrictions; however, these cooling-off periods are substantially shorter than the federal requirement. In the provincial and territorial jurisdictions that do have a cooling-off period, the prohibition ranges from six months to a maximum of two years, depending on the legislation. Consequently, the five-year prohibition established under the *Lobbying Act* is a clear outlier within the Canadian federation.

31. Comparative research shows that cooling-off periods in other OECD jurisdictions are also often shorter.[9] Three examples of many: (1) the UK imposes a two-year restriction on lobbying the government for ministers and senior civil servants;[10] (2) Germany imposes post-employment restrictions on lobbying for the first 18 months after leaving office, only where there is concern that such employment will interfere in the public interest and when decided upon by a three-member advisory body[11]; and (3) the Code of Conduct for the European Commission observes a two-year scrutiny period for commissioners, and a three year period for the former Commission President.[12]

32. A reduction by one year and a move to a four-year prohibition maintains Canada's position as a robust ethical regime while recognizing the need for flexibility in a competitive global landscape. It would also align closely with Canada's standard parliamentary cycle, reinforcing democratic accountability. By preventing former officials from lobbying until after a full electoral term, this adjustment would mitigate conflicts of interest and uphold public trust in governance. At the same time, it acknowledges the practical realities of post-public sector employment transitions, addressing concerns that the current five-year ban may overly burden skilled professionals seeking private-sector roles.

Recommendation IV: Amending the *Lobbying Act* to better define when a consultant lobbyist must definitively register, in order to bring clarity to subsection 5(1).

33. Section 5(1) of the *Lobbying Act* requires consultant lobbyists to register when they "undertake" to communicate with public office holders. The *Act,* however, does not define "undertake" or "undertaking," resulting in ambiguity as to whether the 10-day obligation to register is triggered as of: (1) the signing of a contract or oral arrangement for a consultant to lobby public office holders on behalf of a client; or, (2) the commencement of any communication with a public office holder by the consultant on behalf of a client.

34. To simplify for both the consultant and their respective clients, as well as to help make it easier for the OCL to actually enforce, for the purposes of subsection 5(1), GRIC recommends that a consultant lobbyist must register only once they have undertaken to communicate with a public office holder. In other words, when there is an objective, observable event – the commencement of a registrable lobbying activity.

35. By linking registration to actual conduct, the amendment would improve predictability for consultant lobbyists and their clients, reduce defensive over-registration where no lobbying ultimately occurs, and ensure that the public registry more accurately reflects real lobbying.

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[9] Ibid.
[10] House of Commons Library, "*Lobbying in UK Politics*." (April 2025).
[11] OECD. "Lobbying in the 21st Century: Transparency, Integrity and Access (2021)
[12] Ibid.

36. Finally, it would also support more consistent interpretation and enforcement by the OCL, while preserving the *Act's* transparency objectives by requiring timely disclosure once lobbying activity has in fact begun.

Recommendation V: Amending the *Lobbying Act* to restore clarity, proportionality, and alignment with Parliament's intent as it relates to the *Lobbyists' Code of Conduct*.

37. The objective of the *Lobbyists' Code of Conduct* ("Code"), the promotion of ethical behaviour by lobbyists, is absolutely one that is shared and fully supported by GRIC. However, certain revisions to the *Code* by the OCL – particularly those introduced in 2023 around gifts, hospitality and political work – have had the unintended effect of increasing complexity and interpretive uncertainty within Canada's lobbying framework.

Harmonize Gift & Hospitality Rules with Public Office Holders' Ethical Obligations

38. The previous *Lobbyists' Code of Conduct* operated on a straightforward and intuitive principle: a lobbyist should not offer anything that a public office holder could not accept under their own ethical obligations.

39. Public office holders are bound by a comprehensive set of statutory rules and ethical obligations under the *Conflict of Interest Act, Conflict of Interest Code for Members of the House of Commons* and *The Ethics and Conflict of Interest Code for Senators.* These frameworks contain detailed rules governing gifts, hospitality, reporting, recusals, and conflict management.

40. Historically, the *Lobbyists' Code* operated in harmony with these frameworks by prohibiting lobbyists from offering anything that a public office holder could not accept under their own governing rules. That approach recognized that the primary safeguard against conflicts of interest lies in the ethical obligations of the office holder, while ensuring that lobbyists did not facilitate a breach.

41. Amendments introduced in 2023 to Rules 3.2 and 3.3 respecting hospitality, including the introduction of fixed monetary threshold with per-event and annual caps, has created a stand-alone standard within the *Lobbyists' Code* that does not directly correspond to the ethics frameworks governing public office holders. As a result, even where both parties act in good faith, the existence of two non-identical regimes regulating the same conduct risks uncertainty and interpretive confusion. Overlapping frameworks are most effective when they reinforce one another, not when they impose divergent thresholds.

42. Parliament may wish to clarify the intended relationship between the *Lobbying Act* and the *Lobbyists' Code of Conduct* by affirming that the *Code* should operate in *harmony* with the ethics frameworks already governing public office holders. This could include articulating a clear legislative expectation that the *Code* avoid establishing parallel or conflicting standards where comprehensive safeguards already exist.

Recalibrate Political Work Provisions to Ensure Proportionality

43. Section 10.2(1) of the *Lobbying Act* provides that: "*The Commissioner shall develop a Lobbyists' Code of Conduct respecting the activities described in subsections 5(1) and 7(1)*." In other words, the plain language of the statute limits the authority to the act of lobbyists' registration and the communications that give rise to those registrations – not activities that precede, or are unrelated to, lobbying communications.

44. Political activities undertaken during an election campaign occur before any lobbying communication is contemplated. They are part of democratic participation, not regulated advocacy. While Parliament should legitimately wish to address any true "sense of obligation" that could arise from certain political roles, the statutory foundation of the Code must remain anchored to the regulation of lobbying – not the broader supervision of civic engagement.

45. The 2023 revisions to the *Code* significantly expanded the definition of "political work," capturing a wide range of campaign-related activities, including those performed by unpaid volunteers. These volunteers often join campaigns to help a candidate they support, with no strategic authority or policy influence, and without any certainty the candidate will eventually be elected.

46. Yet under the current framework – even with tiered cooling-off periods – engaging in campaign volunteer activity can trigger post-election restrictions on professional activity. Given the breadth of the enumerated activities, individuals are effectively required to track hours, roles, and campaign functions to assess whether future lobbying limitations apply.

47. GRIC agrees that the underlying policy rationale for political work restrictions is sound: to prevent real or perceived conflicts of interest arising from relationships that create a sense of obligation on the part of a public office holder; however, proportionality must guide the application of that principle.

48. Quite simply, the second tier of roles listed under the *Code's* "other political roles, functions or tasks" (e.g., canvassing, disseminating campaign materials, performing political research or data analytics, etc.), are diffuse, with no meaningful influence, decision-making authority, or privileged access that risk a sense of obligation. Yet, if a certain hour threshold is met on one or more of these tasks, those same volunteers will have a strict one-year cooling off period from not only any lobbying communication with that elected official but also *any* staff member of that same official.

49. Parliament should clarify that restrictions arising from prior political work must be proportionate to the individual's level of influence, access, and decision-making authority. Cooling-off periods should reflect actual risk – not broadly penalize civic engagement. A more targeted framework would preserve public confidence in government decision-making while ensuring Canadians remain free to participate fully in the democratic process.

Recommendation VI: Amending subsections 7(3) and 7(6) of the *Lobbying Act* to extend the requirements applicable to in-house lobbyists to members of boards of directors of corporations and organizations who are remunerated for their board service, while excluding individuals who serve in a volunteer capacity and receive only nominal stipends or reimbursement of reasonable expenses.

50. GRIC would support the OCL's 2021 ETHI preliminary recommendation to amend the *Lobbying Act* to deem *compensated* board directors as employees for registration purposes. This reform aligns with GRIC's commitment to enhancing transparency and reducing administrative fragmentation, and ensuring a comprehensive view of lobbying activities in Canada.

51. Under the current system, paid board members who are not formally employed by the organizations they serve are required to register as consultant lobbyists, creating siloed disclosures that obscure the full scope of an organization's lobbying efforts. This bifurcation forces the public to cross-reference multiple registrations—both in-house and consultant filings—to understand a single entity's lobbying activities, undermining the registry's usability and coherence.

52. By consolidating paid board members' activities under the corporation or organization's in-house registration, the amendment would streamline reporting, enabling stakeholders to access a unified and complete picture of lobbying efforts through a single responsible officer's submission.

53. Moreover, this change addresses a practical gap in compliance. Many paid board members do not self-identify as consultant lobbyists, often due to ambiguity around their role or a misperception that their governance duties exempt them from registration. This ambiguity increases the risk of inadvertent non-compliance, eroding the integrity of the registry. Deeming paid board members as employees clarifies their obligations and centralizes accountability under the corporation's responsible officer, who is better positioned to ensure consistent and accurate reporting.

54. Finally, and to be clear, GRIC is steadfast that this recommendation *must* distinguish between paid and unpaid board members. Unpaid directors, often volunteers or advisors without financial stakes in the company, should not be subject to the same obligations as those compensated for their work. As such, any amendment must be clear that it does not apply to individuals who serve in a volunteer capacity and who may receive only nominal stipends or reimbursement of reasonable expenses. This targeted approach ensures the regime remains proportional, avoiding undue burdens on non-profit or volunteer-driven organizations while focusing on paid advocacy efforts that warrant public scrutiny.