

NOTICE OF THE COMMISSIONER

NOTICE NO. 2018-01

**GROUPS FORMED OF NON-PROFIT
ORGANIZATIONS COMPOSED IN THE
MAJORITY OF PROFIT-SEEKING
ENTERPRISES OR REPRESENTATIVES OF
SUCH ENTERPRISES**

Consequently, an NPO Group composed mostly of organizations representing profit-seeking enterprises is subject to the Act.



Jean-Francois Routhier
Lobbyists Commissioner

A non-profit association or group may be composed primarily of other non-profit organizations (designated hereinafter as "NPO Group").

The purpose of this notice is to determine the circumstances in which such an NPO Group, by the combined effect of section 3 of the Lobbying Transparency and Ethics Act and paragraph (11) of section 1 of the Lobbying Transparency and Ethics Act Exclusion Regulation, is subject to the provisions of the Act because it is formed of members, the majority of whom are profit-seeking enterprises or representatives of such enterprises.

The Act must be interpreted so as to give full effect to the principle of transparency on which the legislator based itself upon its adoption. The fact that non-profit organizations have joined together within an NPO Group cannot be an obstacle to this principle. Thus, when the organizations composing the NPO Group are mainly composed of profit-seeking enterprises or representatives of such enterprises, they themselves become representatives of an enterprise within the meaning of paragraph (11) of section 1 of the Regulation.