



O.R.L.
office of the
registrar
of lobbyists
BRITISH COLUMBIA

GUIDANCE DOCUMENT

GUIDE TO THE 100-HOUR THRESHOLD

June 19, 2018

PURPOSE OF THIS GUIDANCE DOCUMENT

This guidance document explains the 100-hour threshold in the *Lobbyists Registration Act* and what it means for lobbyists.

BACKGROUND

The *Lobbyists Registration Act* recognizes that considerable research and internal discussion may occur before an organization commences lobbying. All preparatory activities directly related to and necessary for lobbying to occur must be included in the calculation of 100 hours, in addition to any meetings.

Once you've decided to lobby, you need to consider if these activities amount to 100 hours in the previous 12-month period. If so, your organization must register the intent to lobby in the Lobbyists Registry.

GUIDELINES

1. One hundred hours are equal to 12.5 eight-hour days. The calculation is not 100 hours per individual or per subject matter, but the hours spent collectively by the organization that is preparing to lobby.
2. If your organization employs one or more individuals who, alone or collectively, spend 100 hours lobbying or preparing to lobby, your organization is required to register all in-house lobbyists.
3. When calculating your organization's lobbying activities, you do not need to track each and every activity to the minute. However, you must record time spent in activities that are directly related to and necessary for lobbying as accurately as possible.
4. Activities directly related to lobbying include:
 - Researching and writing reports, letters, submissions, and other correspondence to be given to a public office holder;
 - Deciding which public office holders to target;
 - Lobbying by letter, email, phone, or in person;
 - Time spent negotiating contracts for services related to the lobbying strategy;

- Time spent by service providers working on behalf of your organization to develop aspects of the lobbying strategy (for example, a graphic designer or writer);
 - Hiring and training staff to lobby; and
 - Monitoring and adjusting the strategy.
5. Preparatory activities performed by an employee of an organization count towards an organization's 100 hour threshold that determines if the organization is required to register in the BC Lobbyists Registry. However, an employee who only performs preparatory activities, such as researching or deciding which public offices to target, is not considered to be an in-house lobbyist if they do not "communicate" with public office holders as required in the definition of "lobby" in s.1 of the LRA.
6. Activities that predate the decision to lobby would likely not be included in the calculation:
- Researching an issue and developing positions;
 - Gathering information and data to help develop a position; and
 - Internally discussing issues that later become the subject of lobbying activities.

Note: These guidelines do not constitute a decision by the Office of the Registrar of Lobbyists for BC.