



Canadian Study
of Parliament Group

**Organized Interests and MPs in Canada's House of Commons:
Constituency and Committee Factors in Lobbyist Targeting**

Munroe Eagles
Professor of Political Science
Director of the Canadian Studies Academic Program
University at Buffalo – The State University of New York

October 2013

Executive Summary

The concentration of power in Canada's political executive results in a well-understood elite-focused lobbying strategy for successful interest groups. According to most conventional wisdom, in the lobbyists' universe, Members of Parliament present unattractive targets since they play a minor role in the refinement of legislation. Reflecting this, prior to 2010, the list of key government decision-makers ("Designated Public Office Holders" - DPOHs) with whom lobbyist contacts were required to be recorded in monthly communication reports did not include even MPs and Senators. Adding MPs to the DPOHs in 2010 means that we now can evaluate the amount of lobbying activity they attract and to compare this with the contacting of other DPOHs. It turns out that MPs are the most frequently contacted group of DPOHs. This paper uses the data from lobbyist reports since 2010, supplemented by interviews with former MPs, to determine whether the contacting of MPs by lobbyists appears to be related to one of two factors: aspects of the constituency context of MPs; and their membership on parliamentary committees. My findings suggest that lobbying activities are structured by both factors, particularly regarding activities related to the primary and health sectors. Perhaps it is time to revisit our thinking on the place MPs occupy in the policy process.

Acknowledgements: The research on which this paper is based was supported by a James R. Mallory Research Grant from the Canadian Study of Parliament Group. The author is grateful for this support, and for the diligent research assistance of Hongxing Yin, a recent doctoral graduate in Political Science at the University at Buffalo in preparing the backbench MP files for analysis, and from Ms. Diane Lanteigne of the Office of the Commissioner of Lobbying of Canada for her assistance in extracting data from the 'monthly communication reports' for 2008-2012. I am also grateful for being granted access to the transcripts of 'exit interviews' conducted with former MPs since 2008 by Samara. Samara is an independent charitable organization that works to improve political and civic engagement through research and outreach. More information is available at www.samaracanada.com. I would also like to express my gratitude to the three anonymous reviewers for the Canadian Study of Parliament Group for their helpful comments and criticisms of an earlier draft of this paper. Obviously, I absolve all of the above for any errors or shortcomings of the paper, and I should also point out that none of those supplying materials for the study bears any responsibility for the use I have made of them, or for the conclusions I have drawn.

Introduction – Targeting Parliamentarians by Lobbyists

There has been a dramatic growth in the number of interest or pressure groups seeking to influence public policy in Canada and elsewhere in recent decades. Influencing the content of public policy in a way favourable to their members is one of the key activities of these groups. Reflecting the growing importance of this activity, the number of registered lobbyists in Ottawa has almost doubled in the past 23 years – growing from 2,575 in 1989 (when registration was first required) to 5,173 as of September 30, 2012 (ocl-gc.ca). Representing the interests of their members effectively in the policy process means that group lobbyists are continually in search of access to significant decision-makers. Those most successful in this regard are ones that are creatively adaptive in tailoring their lobbying efforts according to the particular terrain of power in their political system and policy sector. Every political system will provide multiple points of access to group representatives, but not all systems are equally open to group influence and not all of the possible entry-points for group representatives are equally valuable (Naoi and Krauss, 2009). Interest groups have therefore been described as ‘talking chameleons’ in the policy process since their success hinges on their ability to adapt their activities to the shifting distribution of power in a political system.

The extreme concentration of power in Canada’s political executive (elected, civil service, and executive support agencies) (or according to Savoie, 2008, the Prime Minister’s “court”) results in a well-understood and widely agreed-upon prioritization of a highly targeted and elite-focused lobbying strategy for successful interest groups. According to this near consensus, members of Parliament are but minor players in the policy process and are therefore expected to be ignored by savvy groups who concentrate their search and attention on more influential targets. Some analysts have argued that this neglect of MPs by lobbyists is

symptomatic and reflective of the general decline of Parliament in Canada: “One of the most telling pieces of evidence for this decline in the importance of Parliament and MPs is that fewer and fewer lobbyists ever take the time to lobby MPs. It just is not worth their time or energy,”(MacIvern, 1985: 21).

A similar assumption of the irrelevance of ordinary MPs to lobbyists seems also to have been held by the originators of the regulatory regime governing lobbying in Canada, which was designed to render transparent and accountable the system of interest representation in Ottawa. Beginning in 1989 lobbyists (i.e. those who spent at least 20 percent of their compensated time attempting to influence public policy) were required to register and disclose the subjects of their lobby efforts with key decision-makers in the policy process. Revealingly, until September 2010, this list of ‘key government decision-makers’ (so-called “Designated Public Office Holders” or DPOHs) did not even include MPs and Senators.¹ Clearly, MPs and Senators were not considered to be significant enough policy actors to warrant having their relationships with lobbyists monitored and made available for public scrutiny.

The decision to extend the DPOH category to include Members and Senators in September 2010 came as the Conservative government of Stephen Harper was attempting to control damage resulting from revelations concerning the activities of Rahim Jaffer, a former Conservative MP who had been defeated in the 2008 federal election. Jaffer and Patrick Glémaud were the principals of GPG-Green Power Generation Corp, and both engaged in lobbying in an unsuccessful attempt to obtain federal funding for an energy company. Media

¹ The 2008 *Lobbying Act* defined designated public office holders as the Prime Minister, Ministers and their staff, Deputy Ministers, and Assistant Deputy Ministers. In 2010 the list of DPOHs was expanded to include senior officials in the military and parliamentarians. For a summary of the evolving regulatory process governing lobbying, see the speech by Commissioner for Lobbying Karen E. Shepherd, “Lobbying Legislation in Canada: Ensuring Transparency,” 2011 (available at: <http://ocl-cal.gc.ca/eic/site/012.nsf/eng/00543.html>). See also Thurlow, (2010b).

reports of Jaffer's activities began to circulate in April 2010, resulting in the Commissioner of Lobbying, Karen Shepherd, undertaking a full investigation. Released in December 2010, Shepherd's report found both individuals guilty of lobbying while not registering with the Commission.

While this investigation was ongoing opposition Members pressed the government to close a loophole in the existing regulations by expanding the DPOH category to include parliamentary secretaries (who were among those Jaffer approached but who were not considered DPOHs under the provisions of *The Lobbying Act* then in place). In response, Stephen Harper's government pre-empted these demands by advocating a more far-reaching change that would include all MPs and Senators in the DPOH category. As Conservative MP Patrick Brown argued in a speech to the House of Commons in May:

“... it is important that we go one step further by extending it to all MPs. We realize that much important work is done in committees of Parliament and that there will be lobbyists approaching MPs on all sides of the table, and that is why it is important that we extend this as far as possible. I assume that the Liberal Party would not have a problem with that. It will be interesting to hear whether the Liberals oppose our position that this should be extended to all MPs and the leaders of the opposition.” (*Hansard*, Vol. 145, No. 39, 3rd Session, May 4, 2010)²

Similarly, in the same debate MP Andrew Saxton, Parliamentary Secretary to the President of the Treasury Board, Stockwell Day, explained that “Parliamentarians are a crucial link in the decision-making process. Members, senators and their staff are entrusted by Canadians to make decisions in their best interests. If opposition members want to really demonstrate a commitment

² In fact, opposition Members were not quick to embrace this extension. For example, MP Scott Simms, Liberal (Bonavista-Gander-Grand Falls-Windsor) responded to the initiative as follows: “The government is trying to somehow muddy the waters and is saying it has to look at lobbying on the other side of the House, but the fact of the matter is that all MPs have to lobby for their constituents for roads and bridges in their areas. That is common practice. But we are talking about contracts. We are talking about insider information. Mr. Jaffer was trying to use his friendships in the Conservative Party to get contracts for himself and his buddies.” (*Hansard*, Vol. 145, No. 39, 3rd Session, May 4, 2010). See also “Lobbyists Get New Rules,” *The Toronto Star*, Tuesday, Sept. 21, 2010: A-6. For a brief but comprehensive overview of lobbyist regulation in Canada, see Holmes and Lithwick, 2011.

to openness and transparency, they should have no problem supporting that.” (*Hansard*, Vol. 145, No. 39, 3rd session, May 4, 2010). In addition to requiring lobbyists to include communications with MPs and Senators in their monthly communication reports to the Commissioner, these 2010 reforms would also have the effect of banning Senators and MPs like Jaffer from being employed as lobbyists for five years after leaving public office.

As a result of these reforms, since September 2010 we have an opportunity to comprehensively evaluate the amount and nature of lobbying activity that is directed toward MPs and to make authoritative comparisons with the contacting of other DPOHs. These reports reveal that – far from being ignored by lobbyists – MPs are being contacted with astonishing frequency. These records reveal that for the two years from September 2010 to September 2012 over 31,000 separate communication efforts involving MPs were recorded by registered lobbyists.³ As such MPs now constitute, by a significant margin, the single largest group of DPOHs in terms of the volume of lobbying activity. This unexpectedly high volume of meetings between MPs and lobbyists runs counter to expectations based on the conventional wisdom and it suggests that our understanding of their place in the policy process may need to be reevaluated.

How is this extraordinary level of attention given by lobbyists to parliamentarians to be explained? One simple – if somewhat cynical - answer might be that ordinary parliamentarians (i.e., those not in cabinet) may be particularly accessible to lobbyists, and therefore useful for filling up their appointment sheets with activity when more attractive targets are unavailable. Policy influence may not result, but such activity may help the group legitimate itself to its

³As briefly noted above, individuals must register as lobbyists if they devote a ‘substantial portion’ – more than 20 percent - of their compensated time to communicating with policy makers. Corporations or not-for-profits must register if the accumulated total of the lobbying activities of all their employees is at least 20 percent of one person’s time in a month. Lobbyists are classified as either ‘consultants’ who work under contract on behalf of clients or ‘in-house’ – when they lobby on behalf of their employer.

members by giving the appearance of vigorous and energetic advocacy on their behalf. This ‘shotgun approach’ could explain the unexpected frequency with which they are in touch with legislators. However, if this is the prevailing motivation of lobbyists, such contacts should be randomly distributed across the membership of the legislature and there should be little evidence that contacts with legislators are structured in any way. One Member will be as useful to the group’s representatives as others and lobbyists will take any and all parliamentary access that is made available to them. An absence of evidence of targeting legislators, therefore, would suggest that organized interests are going wherever they are welcome, or at least where they can gain access, rather than focusing on legislative targets that may be of higher value in terms of their policy impact.

I explore the latter possibility in this paper – namely, that lobbyists in the Canadian parliamentary process focus their efforts on particular subsets of legislators for strategic reasons. Specifically, I look for evidence in the monthly contact reports filed by lobbyists, and supplemented by interviews with former MPs about their experience with representatives of organized interests (Samara, 2012), of patterns in the contacting of MPs by lobbyists that appear to be related to one of two factors: a) features of the constituency context of MPs or b) to their membership on parliamentary committees. The first factor addresses the possibility that lobbyists are targeting MPs who represent constituencies where the group’s interests are in some way concentrated. In these cases, MPs might be particularly sympathetic to the group’s message, and willing to work with the group to achieve policy objectives in order to cultivate their local base of electoral support. Additionally, MPs who are members of parliamentary committees that align with the interests of the group may provide an attractive target for lobbying activities regardless of (or in addition to) the MPs constituency characteristics. In either case, evidence

that lobbyists are discriminating in their contacting behavior constitutes evidence that, in the eyes of these policy insiders, the ordinary MP may be of greater policy relevance than they are given credit for by the conventional wisdom.

Two caveats need to be introduced before proceeding to this analysis. First, because I am interested in the potential importance of constituency factors on lobbyist contacting, beyond the descriptive overview of lobbyist contacting in the third section of the paper, I will focus the detailed analysis on MPs rather than Senators. This is because Senators represent provinces/regions that are for the most part too large and internally differentiated to provide much incentive for targeted lobbying of the type explored in this study. Secondly, for a variety of reasons to be discussed later, there are compelling reasons to expect that committee influences on lobbying activity will appear stronger in the empirical analysis than the impact of constituency factors. Though influence on policy is notoriously difficult to demonstrate in empirical research (and there will be no direct evidence forthcoming in this paper about the efficacy of lobbying MPs in terms of modifying policy outcomes), my research suggests that at least a significant portion of the activities of lobbyists in this regard is not simply ‘busy work’ designed to impress their clients and/or to fill up their time sheets. While data limitations condition the strength of my conclusions, I am able to demonstrate that an important proportion of the lobbying activities directed at MPs is neither random nor lacking in strategic orientation. As such, I argue that, if we are to understand the apparently vigorous symbiotic relationship that appears to exist between organized interests and MPs, the relationship between these actors deserves more careful scrutiny than they have received in the past

I begin the paper by reviewing the state of our current understanding of the art and science of lobbying in Canada. Knowing that lobbying MPs is actually a frequent occurrence, I

will attempt to discuss possible explanations for why the conventional view of the irrelevance of MPs in the policy process is somehow wrong or misleading. The second section of the paper introduces the data that has been compiled from the official ‘monthly communication reports’ that have been required of lobbyists since July 2008, and in so doing uses the officially recorded data on lobbying activity writ large to offer a comprehensive overview of this activity over the past several years. The third section focuses more directly on the records of lobby activity since September 21st, 2010 (the first full day after MPs and Senators were added to the list of DPOHs) that involve MPs⁴. In this section, I seek to identify patterns in the contacting of MPs that are related to contextual characteristics associated with the riding they represent in parliament (primarily, the distribution of jobs across employment sectors, but also other features of their demographic or political nature). A fourth section presents a series of tests designed to see whether lobbyists make use of the committee memberships of MPs when targeting their communication efforts. A final empirical section provides a test of the independent contribution of constituency and committee characteristics to the structuring of the lobbying of MPs. A brief concluding section offers an overview of the key findings and offers some suggestions for further work in this area.

⁴ The extension of the definition of DPOHs who fall under the reporting requirement has not been without controversy from within the lobbying industry. W. Scott Thurlow, a senior lobbyist, has been critical of the new regulations: “Two different problems emerge from the new state of play in Ottawa and these new rules being implemented. On the one hand, there are MPs who now completely avoid meeting with lobbyists. This is undoubtedly bad for the democratic process and will significantly curtail the effectiveness of MPs. On the other hand, there are MPs and their staff who are becoming regimental about what they think the requirements under the Lobbying Act are. In many cases, MPs and their staff are requiring all potential petitioners to register before they meet with them, even if the people in question are not required to register under the Act.” (Thurlow, 2010: 46). As will shortly become apparent, the first problem he mentions – MPs refusing to meet lobbyists - does not appear to be a consequential one.

Why Might Lobbyists Target MPs in Canada?

As noted above, conventional wisdom among students of interest group lobbying in Canada has been that MPs are too peripheral and powerless in the policy process to be considered attractive targets (or perhaps to be targeted at all). This is a sharp contrast to the American experience, where the relative voting independence of legislators makes them a prime target for organized interests seeking policy advantage. In Canada, however, the strong party discipline characteristic of the parliamentary system reduces the potential return to lobbyists in contacting ordinary MPs since the latter are not free to deviate from party-determined positions in their legislative behavior (Bennedsen and Feldman, 2002). Rather, scholars have argued that successful groups will focus their efforts on communicating with members of the political executive (the cabinet and executive support agencies) or perhaps especially the bureaucracy, since the latter is primarily responsible for drafting most legislative proposals and policy initiatives. Moreover, whereas MPs tend to serve relatively short terms in office in Canada (Docherty, 1997), bureaucrats have relatively long careers and as a result any cultivation efforts directed at them are likely to bear fruit over a long period of time. While contacts with high level executives and ministers might appear at first glance to be the most prized, since these individuals occupy critical places in the policy and agenda-setting processes, even lowly departmental officials can be a critical target for a lobbyist. If contact can successfully be made deep in the civil service, a group's preferences can be instrumental in the early shaping and drafting of policy proposals. Moreover, relationships developed with junior civil servants offer an opportunity to shape the orientations of officials early in their tenure, and these investments may pay long-term dividends if they subsequently enjoy successful careers.

Similar motivations have been identified to explain lobbyist attention to backbench MPs. Jackson and Atkinson (1974: 37), for example, suggest that MPs may be the target of lobby efforts as part of a long-term investment in relationship building:

One of the main reasons is that cabinet members are, to some degree, recruited from the ranks of the government backbench and neither they nor opposition members can be made to feel isolated or ignored. Both groups have potential influence. Members may also become good public relations agents for various interests. Although most members do not acknowledge much interest group influence in their own elections, there are strong possibilities for group activity in those constituencies where group interests are concentrated. But the major reason for constant group pressure on the backbench may be the belief that a changed opinion there may force an alteration in cabinet's position.

However, most scholars have dismissed MPs as suitable targets for organized interests. In their influential introductory textbook on the Canadian political system, for example, Richard Van Loon and Michael Whittington, give expression to this settled position:

Modern government in Canada concentrates the bulk of power in the cabinet and the bureaucracy. Parliament, therefore, is not likely to provide interest groups with a successful arena. As one experienced lobbyist said, 'When I see members of Parliament being lobbied, it's a sure sign to me that the lobby lost its fight in the civil service and the cabinet.' He might have added that while the group lobbying MPs may occasionally win some temporary victory, its chances of success in the longer run are slight unless they can convince some cabinet ministers as well. (Van Loon & Whittington, 1976: 36)

Similarly, C.E.S. Franks' authoritative depiction of the workworld of Canadian MPs stresses the marginality of MPs in the policy process as being responsible for their neglect by lobbyists:

For the most part these relationships between interest groups and government bypass MPs and parliament. Interests tend to begin their lobbying activity well down in the system and appeal upwards when they lose. Their first efforts are directed at the departments and the public service so that memoranda submitted to cabinet will reflect their concerns while policy is being formed. If this fails, they will meet with senior public servants, perhaps the deputy minister, or even the minister. If these efforts are unsuccessful and legislation is proposed to which it is opposed, the group may then decide to lobby members of Parliament and

eventually appear at the hearings on the bill before a committee of the House of Commons or the Senate. Parliament, in other words, is the last line of defence.(Franks, 1987: p. 93)

Yet a number of empirical researchers looking at lobbyist activities have turned up some surprising evidence that is difficult to square with these accounts. Specifically, several scholars have noted that there is a relatively high level of communications activity was directed toward this group by lobbyists. Robert Presthus' (1971: 447) interviews with a random sample of Canadian MPs in 1969-1970, for example, showed that 70 percent reported interacting with lobbyists 'frequently' (i.e., at least twice a week). Equally puzzling as the high level of activity between lobbyists and MPs found in Presthus' study is the fact that while MPs in the then-governing Liberal party were slightly more likely than others to be the target of a lobby, the inter-party differences were modest and not statistically significant. This is paradoxical according to conventional accounts of the policy process since opposition MPs, other things being equal, are even less likely to be effectual in influencing policy than are members of the government caucus.

Summing up this apparently paradoxical situation, Thompson and Stanbury (1979: 37) have concluded that ignorance of the policy process leads many lobbyists to pursue futile contacting strategies:

“The fact is that much interest group activity does not appear to be focused on those with whom it will have the most influence. Some groups, for example, make no attempt to influence policy and legislation before it reaches the parliamentary stage. It is hardly surprising that the representatives of these groups are generally acknowledged to be ineffective in obtaining satisfaction for their groups' claims.” ... many interests are denied access to critical stages of the legislative process. This is not because people in high places will not talk to certain interest group representatives...Interest group representatives fail because they do not know to whom they should talk or when they 'should get their oar in.' In many cases they do not even know that they do not know until it is too late. That is, they do not have the information they need to maximize their influence. Consequently, interest group representatives do what they can; they talk to legislators, perhaps in

the hope that the legislators, at least, ‘know what’s going on.’ If that does not work, at least it cannot hurt.”

The authors’ Darwinian perspective, however, suggests that such attention to legislators will be a passing phenomenon, as ineffective actors who waste their time will be driven out of the influence game by more savvy operators.

The question remains, however, as to why large numbers of professional persuaders who are at least privileged observers and often experienced veterans of the policy process on Parliament Hill, and who therefore ought to be best situated to know where effective opportunities for influence exist in the policy process, continue in large numbers to target MPs. Could it be that these lobbyists have simply gotten it wrong and fail to appreciate the futility of these misdirected communication efforts? Or is it possible that there is some more nuanced logic underpinning the surprisingly close relationship of lobbyists and MPs? Robert Presthus’ (1971: 448) study addressed the latter possibility by asking a sample of 140 Canadian MPs a series of questions about the nature of their interactions with organized interests and the functions these contacts may perform for them. He found that among the most common functions lobbyists performed for MPs was to provide information on pending legislation (40 percent), to help MPs represent all community interests (39 percent), to help MPs appreciate the attitudes of their own constituents (28 percent), and to help them build support for the MP’s policies (25 percent). So it would appear that MPs are open to approaches by lobbyists and find value in their interactions with them. For their part, groups seeking to influence policy outcomes readily approach MPs, but existing research suggests that backbenchers themselves are not their primary targets. In a related study, Presthus (1973: 230-231) asked Canadian interest group directors about their targeting activity in 400 specific cases and found that 40 percent of all groups focus on the cabinet, 26 percent focus primarily on the bureaucracy, and only 15 percent see the legislature

as their primary target. Perhaps the simplest rationale explaining this pattern is that, in a relatively closed policy process where access points are few, groups are reluctant to ignore any possible target of influence (Jackson and Atkinson, 1974: 34).

Others looking at this question come up with more positive rationales for interest groups targeting of MPs. Paul Pross, one of the leading specialists in the study of pressure group politics in Canada, goes even further in establishing a positive logic for the targeting of MPs by lobbyists. He contends that interest group involvement in the policy-making process has shifted over time from one in which they mainly provide specialized information to policy-makers into one that essentially provides legitimation to the policy process and its outcomes. In an earlier time period, groups focused their efforts on bureaucrats because these players were more central to the formulation of policy and more fully in control of the process than is the case today. However, Pross argues that the days of close control of the policy process by the ‘mandarins’ of the civil service and by cabinet members has declined since the 1970s. As such, policy formulators increasingly turn to parliamentarians to broaden the base of support for a policy initiative. MPs, in turn, have developed more specialized policy expertise because of reforms to the committee system. In this new policy-making environment, MPs enjoy an enhanced role and relevance. According to Pross:

A system of pressure group politics that emphasizes the search for legitimation enhances the role of Parliament, for the simple reason that of all of the political institutions in Canada, Parliament – the House of Commons in particular – is, after the constitution itself, the pre-eminent legitimating institution. ... Parliament’s legitimating capacity, in conjunction with its ability to focus public debate, now makes interaction with the legislature highly desirable in the eyes of many groups and a necessity in the eyes of others. (Pross, 1992: 252 & 253)

In this way, Pross contended that the shift in group activity was contributing to a revitalization of Parliament’s role in the policy process. Generalized legitimation might well arise from relatively

indiscriminate contacting of legislators by organized interests, thus providing another possible reason to expect increased levels of untargeted contacting.

It is probably fair to say that Pross' optimism concerning parliament's growing relevance in the policy process is not generally shared by most in the scholarly community. Rather, more recent depictions of the political and policy-making system in Ottawa have underscored the continued decline of the House of Commons in the past couple of decades. Indeed, according to Donald Savoie, Canada now experiences "court government" in which central control is concentrated more firmly than ever in the hands of the prime minister and his closest and most trusted personal advisers (Savoie, 2008). Indeed, it appears to most observers that these centralizing tendencies have only intensified under the current government of Prime Minister Stephen Harper. Hopeful dispositions like those of Pross notwithstanding, from the point of view of lobbyists seeking accommodation for their group members in the legislative process at least, neither particular MPs nor parliament in general should present especially attractive targets for their communication efforts.

Though Presthus' work noted earlier suggests that lobbying activity performs a range of useful functions for many MPs, as a whole Canadian legislators seem to be divided on the question of their own suitability as a target for lobbyist communications. Some appear to be highly skeptical.⁵ For example, in an exit interview with Samara, one former MP who served

⁵ This view was articulated by a number of opposition MPs in the debate over the proposed extension of the DPOH category in May 2010. For example, Jim Maloway, NDP MP for Elmwood-Transcona, said in his speech on the topic in the House of Commons: "Jaffer did not lobby the member for Burnaby—Douglas. He did not lobby the member for Winnipeg Centre. He knows that members of the opposition have no decision-making power. They could not give him what he wanted. They could not give him the contracts he was looking for. The President of the Treasury Board (Stockwell Day) was doing a disservice to this House by trying to confuse the issue and muddy the waters....Mr. Speaker, I really wanted to point out that at the end of the day, when we strip away the veils, the fact of the matter is that the lobbyists are looking to talk to the people with decision-making authority, and those people sit on the other side of the House. They do not sit on this side of the House. ..In Mr. Jaffer's case, he was

for almost 15 years in the House, responded as follows to a question about their experience being lobbied on the Hill:

I always thought it was rather silly. Because they were really lobbying their own people but who they should be lobbying were the bureaucrats. I'm serious. I am absolutely dead serious. They should have been lobbying the bureaucrats and I am sure they were. Absolutely.... [Q: was there a lot of lobbying activity?] "No, I was a backbencher. Not only that, there wasn't a lot. They should be lobbying Ministers, the PMO, and more than anything the bureaucrats.

Other MPs acknowledge that group lobbying was a useful source of information. For example, another veteran MP noted in their 'exit interview' with Samara that:

As far as associations, policy groups and interest groups, occasionally those people met me at my constituency day here, but more often than not they came to my Parliament Hill Office and presented their case and left me with material." [Q: Did you find them useful for research material?] ... Yes. They helped me to hone my opinion about a certain bill that was upcoming, etc. Oh yes, you have to meet with those outside people.

Still another former long-serving MP underscored the role of lobbyists in helping clarify the complexities of some legislative proposals:

Well lobbyists are, again, part of the ecosystem [and] ... it would be disrespectful not to listen to all points of view. And you may apply a discount factor, of course they are paid to say that. I can tell you one of the most complex pieces of legislation we reviewed was the Canadian Environmental Protection Act. And man, you can get into plastics people, the road salt people and I mean my goodness you're in to a very complex world. This is where the power of research comes in because you listen to what they say, you listen to what the other guys say and then you try and formulate, you try and do some independent research from whatever source, and again you may even go to the Civil Service and say 'well, what do you think?' Or you go to some more detached group of folks and say, 'well give me a risk analysis here.' Then you form your own view ... so you don't discount them just because they're lobbyists because they will know the case of their client pretty well and one should know that. You don't want to do damage, so they're part of the ecosystem too.

not lobbying the member for Burnaby—Douglas, because he knows the member for Burnaby—Douglas has no access to government contracts. The type of activities that Mr. Jaffer was involved in had exclusively to do with the government and people he knew within the government." (*Hansard*, Vol. 145, No. 39,3rd Session, May 4, 2010).

Clearly, it is important to understand the symbiotic relationship of MPs and lobbyists as they co-exist in the Ottawa political ‘ecosystem.’ In this respect, it is somewhat surprising that relatively little empirical attention has been given in recent decades to the activities of lobbyists with respect to MPs. While conventional accounts of the policy process may make it seem unlikely that there would be much contact between these groups, there is ample evidence to the contrary. And though it may prove to be true that lobbying MPs may have small returns, it would be premature and irresponsible to simply assume that this activity is the result of a misguided view of the policy process on the part of lobbyists, or a result of over-zealous lobbying employees who may be eager to talk to whoever might be willing to listen. Certainly, in the face of compelling and objective evidence of the sheer volume of MP lobbying that is going on in Ottawa, it is necessary to revisit this question. How then, might the attention that is currently being shown to MPs possibly be explained?

Perhaps the simplest potential explanation might be that lobbyists are leaving no stone unturned in their efforts to influence policy outcomes. As Thompson and Stanbury have put it, at least this cannot hurt their cause. In-house corporate lobbyists are being paid by their company to lobby, and consultant lobbyists are being paid by clients to lobby, and any legitimate DPOH might therefore make a worthy target for lobbyists eager to demonstrate that they are actively attempting to influence decision-makers. According to this understanding, lobbyists would be prepared to meet with anyone – including lowly opposition and government backbench MPs. If this is the case, one would expect to find very little evidence of an underlying structure or pattern in groups’ deployment of their lobbying efforts. If all ears are equally valuable to the communicator, then any available ear will do to demonstrate to group membership the dedication and *bona fides* of their messenger.

Before accepting this conclusion, however, at the very least there are several rival explanations for the contacting behavior of lobbyists that should be ruled out. These possible explanations reflect the fact that not all MPs are likely to be equally appropriate for lobbying on any given issue. Despite earlier research suggesting that government MPs are not targeted much more frequently than opposition MPs, clearly MPs caucusing with the governing party have a more direct line of influence on most legislation than their counterparts across the aisle. Accordingly, other things being equal, an effective lobbyist would probably prefer contacting a government member over opposition MPs. Similarly, lobbyists might tailor their communication activities toward the most electorally-vulnerable members of the House on the assumption that these individuals may be more open to an argument from interests in general who might be able to have an impact on her/his re-election chances. In this case, MPs representing ridings with narrow margins of victory might see more lobbying activity than their counterparts from safer seats. Alternately, lobbying activity might reflect other aspects of the diversity of Canada's electoral districts and the communities they contain. MPs from ridings whose interests might be disproportionately affected by a piece of legislation might be expected to have a greater incentive to give voice to a concerned interest's position. A farmers' group, for example, might expect an especially sympathetic hearing from a MP representing a rural constituency where agricultural interests are particularly significant. One former MP interviewed by Samara responded to a question on the overall volume of lobby activity directed at legislators in Ottawa as follows: "Well they do their lobby days, so you, if it's tangential to your riding, or your critic portfolio, or your governmental responsibilities, you have an obligation I think in some sense to hear what they have to say. There was a lot of that. [Q:Does that take a lot of time?] "... I think it would depend on what riding you're from...." By the same token, it could be that the MPs from rural

farming districts might be disproportionately likely to sit on the Standing Committee on Agriculture and Agri-Food and a lobbyist for farmers might therefore find it particularly effective to seek an audience with members of this group since they will deliberate on all legislation affecting the agricultural sector. Committee memberships, then, might be expected to help structure the lobbying activities of organized interests *vis-à-vis* parliament.

Determining the logic behind legislator contacting in Canada is a question for systematic empirical research. One possible direct strategy would be to ask a sample of lobbyists themselves about their targeting strategies and why they might approach MPs and Senators. However, if the earlier contention that lobbyists are simply marking time and promoting themselves by filling up their time sheets with meaningless meetings, it is unlikely that they would openly admit to such cynical and self-serving behavior in an interview situation. A less direct approach is therefore necessary and the data generated by the new regulatory regime in place since September 2010 enables us to offer some preliminary insights into the surprising volume and nature of MP-directed lobbying activity.

Lobbying Activities in the Federal Policy Process Since 2008 – A Descriptive Overview

The monthly communication reports required of all registered lobbyists since September 21, 2010 – the first day after the inclusion of MPs and Senators as DPOHs for the purposes of the regulatory regime governing lobbying came into effect - contain a variety of general information that can be useful in attempting to identify patterns in lobbyist contacting behavior. Available online, these reports include information on the date of the communication; the name and position title, or military rank, of the designated public office holder; the government institution of the designated public office holder; and the general subject-matter of the communication – for example industry, energy, agriculture or health. Tapping this enormous repository of information

on the volume, nature, and target of lobbying activities provides us an unprecedented opportunity to descriptively map and attempt to understand the relationship of organized interests and parliamentarians (among other DPOHs). This section focuses on the overall distribution of lobbying activity across DPOHs and their home institutions since July 1st, 2008, when the requirement for lobbyists to file monthly communication reports came into effect, through September 30, 2012.

First, comparing the frequency of contacts between legislators and other DPOHs gives us an opportunity to assess the relative attractiveness of legislators as compared to other possible targets. Tables One and Two reveal that lobbyists were extremely active over this roughly four year period, registering over 100,000 separate contacts across a range of government institutions and with a wide variety of DPOHs. Table One, which reports the institution foci of lobbying over the period, reveals that fully a third of all contacts over the four-plus year period were with parliamentarians (the great bulk of which – 31 percent - were with MPs). In light of the near consensus on the relative impotence of these players in the policy process, this is an astonishingly high level of contacting. While there are more contacts in total (56 percent of all) made with bureaucrats, these are scattered widely across the departments and agencies of the civil service. Central agencies like the PMO and the Department of Finance and the Treasury Board may be particularly desirable lobbying targets, but together they account for only about 10 percent of all communication efforts over the four-year period.

Table One – Institutional Targets of Lobbying Attempts – July 1st, 2008 to October 1st, 2012

(Total Number and percent of all Contacts)

House of Commons	Senate	PMO	Dept of Finance / Treasury Board	Other Departments and Agencies	Total
31,388 (31 percent)	3,039 (3 percent)	4,269 (4 percent)	5,931 (6 percent)	57,679 (56 percent)	102,306

Source: Calculated from the Office of the Commission for Lobbying Digital Files for Monthly Communication Reports from all registered lobbyists. Downloaded from <http://ocl-cal.gc.ca/eic/site/012.nsf/eng/00505.html> (accessed 10/1/2012).

Table Two – Designated Public Office Holder Targets of Lobbying Attempts – July 1st, 2008 to October 1st, 2012

(Total Number and percent of all Contacts)

Cabinet/Prime Minister (inc Min of State)	Member of Parliament	Senator	Deputy or Assistant Deputy Minister	Other	Total
10,395 (10 percent)	29,336 (29 percent)	2,891 (3 percent)	12,134 (12 percent)	47,550 (46 percent)	102,306

Source: Calculated from the Office of the Commission for Lobbying Digital Files for Monthly Communication Reports from all registered lobbyists. Downloaded from <http://ocl-cal.gc.ca/eic/site/012.nsf/eng/00505.html> (accessed 10/1/2012).

Table Two partitions the 102,000 contacts over the 2008-2012 according to the DPOHs targeted. These figures confirm the surprisingly high number of MP/Senator contacts shown in the top row of the table – slightly under a third of all DPOHs contacted over the period were parliamentarians. Table Two also confirms the conventional view that lobbyists do in fact seek out relationships with cabinet ministers and top civil servants (Deputy or Assistant Deputy Ministers). Of course, there are only several dozen individuals occupying these lofty positions, and these individuals have full schedules that offer relatively little time to meet with

representatives of interest groups. Both these factors constrain the amount of access that lobbyists might expect, and yet fully 22 percent of all contacts made by lobbyists over the last four years were at this level. Clearly, these positions are heavily sought after by lobbyists and they are relatively successful in getting on the agendas of these powerful players in the policy process. However, it is clear from these data that the concentration of power in Canada's political and bureaucratic executive is effective in focusing the activities of many lobbyists.

Given that the regulations concerning the status of MPs and Senators as DPOHs changed midway through the four years covered by these figures, it is helpful to examine lobbyist contacting in each year separately. Table Two contains a breakdown of contacts over time by the institution of government approached by lobbyists. As is to be expected, the number of contacts reported for MPs and Senators takes a spike in 2010, reflecting the inclusion of these individuals as DPOHs. Of course, this doesn't mean that MPs and Senators weren't approached by lobbyists before that date, only that the majority of these visits went unrecorded. And on this score, it is interesting to note that there are small proportions of contacts registered with these groups of individuals during the years *before* they were required by the lobbying regulations. This, according to lobbyist W. Scott Thurlow, reflects over-reporting on the part of cautious lobbyists who feared running afoul of a regulatory regime they did not fully understand. Writing prior to the 2010 changes, Thurlow observed that: "The registry is replete with examples of overreporting, and the most egregious example is that people report meetings with Members or Parliament. MPs are not DPOHs unless they are Ministers. But who can blame these people for over-reporting? There is no penalty for over-reporting" (Thurlow, 2010a: 44). Similarly, it seems likely that some (probably small) proportion of the lobbying contacts reported for all other institutions would also include meetings with individuals who might not qualify as a DPOH,

since confirming the individual’s particular career level or other qualifications might not be straightforward in all cases (see Thurlow, 2010a: 44). Fearing penalties arising from a failure to comply with the regulations, lobbyists might be inclined to err on the side of caution in filing their monthly communication reports and include their contacts with individuals whose credentials for DPOH status are questionable.

Table Three – Lobbying Activity Targeted at Institutions and Executive Agencies, 2008-2012

(percent of all lobbies by year)

	2008	2009	2010	2011	2012	Total	N
House of Commons	3	4	33	43	40	31	31,388
Senate	0	0	4	4	4	3	3,039
PMO	3	5	3	4	5	4	4,269
Dept of Finance / Treasury Board	8	7	6	5	5	6	5,931
Other Departments and Agencies	85	83	54	44	45	56	57,679
Total	100	100	100	100	100	100	
N	6,851	18,460	22,804	32,590	21,601		102,306

Source: Calculated from the Office of the Commission for Lobbying Digital Files for Monthly Communication Reports from all registered lobbyists. Downloaded from <http://oclc.ca.gc.ca/eic/site/012.nsf/eng/00505.html> (accessed 10/1/2012).

Several other patterns are noteworthy in the data reported in Table Three. First, disaggregating the data by year reveals that individuals in the House of Commons and Senate are even more commonly targeted than the 31 percent figure shown in Table Two for the entire four year period. In 2011 and 2012, the first full years for which contacting them was mandatorily reported by lobbyists, the proportion of all contacts made with MPs hovers around forty percent. When contacts with Senators are included, it appears as though parliamentarians account for almost half (between 44 and 47 percent) of all lobbying activities. Some of this remarkably high

level of contacting may stem from the fact that many MPs frequently are invited to, and attend, informal evening receptions sponsored by an interest group.⁶ Lobbying MPs in groups at such events is perhaps less efficacious than other more targeted communication activities, but the fact that these ‘shot-gun’ type events persist suggests that reception sponsors are confident that there is a return on this type of investment.

Also of interest in these figures is the slight decline in the proportion of lobby contacts made with the Department of Finance and the Treasury Board over the four year period. In 2008, 8 percent of all lobby contacts were with these central agency officials, but by 2011 (and again in 2012) this proportion had fallen to 5 percent. At the same time, PMO officials have attracted between 3 and 5 percent of all lobby communication efforts, with the last two years seeing 4 and 5 percent of all reported contacts going to these personal advisors to the Prime Minister. The growth in the proportion of total lobbying efforts being directed to the PMO during this time period is particularly striking because the figures after 2010 include a broader array of DPOHs and therefore even small percentage increases reflect significantly larger increases in the number of contacts in absolute terms. So holding the same or a greater proportion of the total by the PMO involves a considerable growth in the absolute number of lobbyist contacts over the period. This would appear to reinforce the widely-held view that

⁶ Some MPs are very critical of these receptions. For example, one MP responded to a question about lobbying on the Hill in their ‘exit interview’ with Samara with the following critique: ““Well the most effective, the most influential on Parliament Hill are the ones with big bucks so they have big, big receptions, for one thing it’s a big contribution to alcoholism on the Hill that the booze starts to flow right after Question Period, and of course for some they started by having liquid lunches with those guys too so they’re already bobbing by the time they go in to Question Period. They leave and there’s never a time on the Hill that there aren’t dinners and receptions that you can go from one to the other on the precinct and in the hotels all around and it is unbelievable the amount of time that Members of Parliament spend at those things and guess who funds those? The ones with deep pockets and big bank accounts and so that’s where the biggest influence comes from.”

Prime Minister Harper's PMO has become a more crucial policy-making body, though to make this judgment definitively we would require historical information on the relative distribution of lobbying before Harper took office in 2006.

Finally, while it would be interesting to be able to make some general comment on trends in the absolute number of lobby contacts in each year, but unfortunately this seemingly simple task is complicated by the rules change introduced in September 2010, which had the effect of increasing the number of contacts reported by expanding the number of DPOHs. Thus, we only have one full year for which all communications with the same list of DPOHs is available (2011), and not surprisingly this year shows the largest number (32,590) of lobbying communications. If we assume that contacting is evenly distributed over the entire year,⁷ and we take a monthly average in terms of the number of contacts reported for 2011 and the first nine months of 2012, a rough assessment of the two year difference is possible. This simple calculation shows that in 2011 there were an average of 2,716 contacts made each month with all DPOHs, and this number falls to 2,400 for the first nine months of 2012. Not only were there more contacts reported in 2011 than in 2012 in absolute numbers, but a higher proportion of these were with individuals in the House of Commons (43 percent for 2011 as compared to 40 percent in 2012). On this basis, it is tempting to suggest that some of the increase in contacting observed during 2011 may be attributable to the fact that there was a federal election on May 2nd of that year. The availability of more than 100 rookie MPs elected in that contest may give lobbyists an incentive to contact them and evaluate their positions on issues of concern to the organized interest. So some of the increase in contacting in 2011 may be attributable to the fact

⁷ Lobbying MPs would be expected to be concentrated on those periods when the House is in session and they are typically in Ottawa, so excluding the fall months of 2012, during which the House was in session and MPs in Ottawa, will likely reduce the number of contacts seen for that year, and hence deflate the average monthly contact figures. Definitive judgments must await the accumulation of additional report data.

that there were new MPs and therefore new opportunities for lobbying-related communications to have an impact on a legislator early in her/his career.

Table Four – Lobbying Activities Targeted at Designated Public Office Holders, 2008-2012

(percent of all lobbies by year)

	2008	2009	2010	2011	2012	Total	N
Cabinet/Prime Minister (inc Min of State)	12	16	11	7	8	10	10,395
Member of Parliament	2	3	32	42	36	29	29,336
Senator	0	0	4	4	4	3	2,891
Deputy or Assistant Deputy Minister	25	16	11	9	9	12	12,134
Other	61	65	43	38	42	46	47,549
Total	100	100	100	100	100	100	
N	6,851	18,460	22,804	32,589	21,601		102,305

Source: Calculated from the Office of the Commission for Lobbying Digital Files for Monthly Communication Reports from all registered lobbyists. Downloaded from <http://ocl-cal.gc.ca/eic/site/012.nsf/eng/00505.html> (accessed 10/1/2012).

Table Four presents the data on lobbyist contacts with various DPOHs over the four year period. Interestingly, it shows that MPs constitute the single most frequent target for lobbyists in 2011 – ahead even of the ‘residual’ category of “Other” DPOHs. This is further testimony to the extraordinary concentration of lobbyists’ effort in contacting legislators in the lower house.

While the proportion slips to 36 percent so far this year, MPs still constitute the single largest DPOH group in terms of lobbying activity. This unequivocal evidence of the centrality of MPs to the world of Ottawa lobbyists runs strongly counter to expectations based on conventional

assessments of their irrelevance to the policy-making process. There is clearly a need to square these discrepant perspectives.

In sum, the monthly communication reports filed by lobbyists depict a great deal of communication and persuasion efforts focused on the federal political process. In particular, the accumulated data reveal that far from being ignored by lobbyists whose understanding of their minimal role in the policy process leads them to target more effective policy players, MPs constitute the single most frequently lobbied group of DPOHs. In 2011 MP contacts accounted for 42 percent of all lobby events recorded that year and in the first nine months of 2012 the comparable proportion dropped slightly to 36 percent. This depiction of the high level of lobbying activity is very difficult to square with conventional accounts that stress the relative weakness of MPs in the policy process. While these high levels of contacting may reflect a tendency on the part of lobbyists to talk to anyone who will listen to them on Parliament Hill, it could also be the case that lobbyists are more instrumental with these efforts, selectively targeting MPs according to either their personal/political or constituency characteristics. The next two sections of this paper explore for evidence of these factors as structuring influences on patterns in the lobbying of MPs.

Constituency Contexts and Lobbying Members of Parliament

There is a considerable and growing body of research attesting to the high priority attached by MPs to their constituency's affairs and to the demands from particular constituents for service (Docherty, 1997: 171-201; Eagles, 1998; Carty and Eagles, 2005; Franks, 2007). Interviews and surveys of Members repeatedly turn up evidence that constituency service is one of the most time-consuming – and frequently one of the most satisfying – aspects of the job of an

MP. Certainly Samara's 'exit interviews' with former MPs turn up considerable evidence of the significance of the constituency and its residents to the representational activities of Canada's federal legislators (for an exploration, see Eagles et al., forthcoming, 2013). The constituencies MPs are representing are as diverse a collection of political units as could be imagined, ranging from sprawling, sparsely populated and resource-rich ridings characteristic of the northern reaches of most provinces, to the densely-populated, ethno-linguistically and socio-economically diverse ridings of Canada's major cities.

The combination of MP sensitivity to local and constituency concerns, coupled with the diversity of riding economic, social, and political characteristics, provides lobbyists with an incentive to discriminate in their targeting of particular MPs with specific causes or interests. Lobbyists seeking to influence some aspect of forestry policy, for example, might expect to find a particularly sympathetic ear from MPs whose districts include large tracts of timber. In these settings, the economic impact of forestry will extend far beyond the number of residents actually working in the logging sector. Many other residents may appreciate their communities' dependence on the economic spinoffs and multipliers from the industry. Similarly, advocates for the elderly might seek out MPs whose riding populations are disproportionately comprised of the aged. Agricultural interests might seek out MPs from heavily rural and farming constituencies. Illustrating this was a western MP from the government party caucus who answered Samara's 'exit interview' question regarding his experience with lobbyists in part as follows:

Yes the agricultural groups that I talked to [were particularly effective], and this is a big agricultural riding, were always worth the time. ...Because they were well organized and they had thought out some ideas that they would like to see supported by government to help their cause. I think of the Cattlemen's Association, the Dairymen's Association, the Grain Growers Association, all these different groups [were active and effective], particularly in agricultural areas ..."

So savvy lobbyists might seek to concentrate attention on the MPs whose district characteristics might make them particularly sympathetic to the interest they are pursuing in their lobby campaign.

Equally, lobbyists approaching particular MPs on behalf of some interest or cause would do well to drive home the local significance of the issue whenever possible. In some cases, MPs might not agree to meet with a lobbyist unless there was some constituency connection, or unless they represented an interest for which the MP attached some personal significance. One former MP outlined his process of determining which lobbyists to meet in his 'exit interview' with Samara as follows:

...what I used to do is - I said, "Okay, why would I want to meet with these people? What do they have to do with my riding? Or my field of expertise: transport." If they were transport related, I generally talked to them. If they had something to do with my riding, especially if they were from my riding, or they affected something in my riding I talked to them. The rest of them I would say, 'Sorry, my schedule does not permit meeting with me,' and that was it. It was simple as that.'⁸

According to another long-serving MP (who now is a lobbyist himself after retiring from the House), effective lobbyists will be careful to 'play the constituency card' when communicating with a Member. His response to the question of the effectiveness of lobbying in his experience as an MP in his 'exit interview' was as follows:

Well obviously the constituency angle is very, very important and for any lobby group if they are there to demonstrate and there's an association with the electoral district, obviously an MP listens. He would be silly not to. And the same applies with me. So, and some organizations – a farming organization came to visit you at your office and there were two of the national leaders and the third one was a constituent, I am John Doe of the National so and so and I'm Fred somebody of the National so and so, and hi, I'm, Jane Smith, I'm from Alexandria, that's the

⁸ Another former MP said in his Samara 'exit interview' that: "I had some pretty important employers in my riding, like General Dynamics (the producers of the armoured personnel carriers), so, I would be lobbied by the defence industry, and I would meet with them."

one you focus on. That's human nature. Wise people know this and they structure themselves accordingly so of course when there is a constituency angle. There isn't always, it's nonsense to think that there is. Someone is visiting you to talk about how we should increase development assistance aid to Africa, there might be constituents in the group, but there's no constituents' jobs at stake; it doesn't work that way. It's a broader principle, but still having some connection with constituents is helpful when they do.

It is possible to determine whether this kind of activity is guiding the efforts made by lobbyists as they communicate with MPs by looking for a correlation between the subjects about which MPs are being lobbied and related features of their constituency environments. If lobbyists are targeting their messages towards MPs whose constituencies are likely to exert pressures disposing their elected representatives positively toward the lobbyist's message, there should be a strong positive correlation between particular issues that are the subject of the lobby and relevant constituency characteristics. To explore for evidence of constituency structuring of MP lobbying, I first isolated the records of all lobbying approaches involving backbench MPs (N=248) that were recorded between September 2010 and December 31, 2011. This produced a total of approximately 8,900 lobbying events. These contacts included information on the general subject of the lobbyist approach. Unfortunately, the subject entries made by lobbyists in their monthly communication reports were not always uniform or consistent, and in many cases there were multiple subjects given for a single meeting. To provide as clear and well-defined a test for any putative constituency connection in the lobbying approaches to MPs, I decided to restrict attention to those lobby reports listing only one subject. This further reduced the number of lobby contacts for the analysis to a total of 3,610. While it is unfortunate to have to limit the number of cases so dramatically, including multi-subject meetings would blunt the search for constituency influences by introducing the possibility of there being a variety of rationales for the contact beyond those occasioned by the characteristics of the district itself. So the reduction

in cases is necessary to produce a cleaner empirical test for constituency effects in the targeting strategies of lobbyists.

Unfortunately, the data recorded in the monthly communication reports is quite crude and incomplete. For example, the subjects of the communication are described only in the broadest of terms and coded according to a crude set of categories (for examples, ‘the environment’, ‘agriculture’, ‘sports’, ‘international trade’, etc.). Moreover, because these monthly reports are submitted by a variety of individuals, inevitably there is some variation in the terms used to describe the subject(s) of the meeting. Obviously, it matters whether a ‘contact’ was one of dozens taking place at a reception or whether it involved an intensive one-on-one session in the MP’s office. Secondly, the contact reports do not include details of the precise nature of the approach, how long it lasted or how much it cost.⁹ Such information would be very helpful to anyone trying to understand the lobbying process, whether from a regulatory or an academic viewpoint. In this analysis I necessarily rely on the simple frequency of contacting as a proxy for the strategic priority that lobbyists attach to particular targets. If the regulatory regime governing lobbying is amended to include such critical details, as many advocates of open government are recommending, future researchers will be in a better position to measure the intensity of group interest in particular targets.¹⁰

⁹ For example, a report might be triggered by a simple phone conversation, or one over a cup of coffee, with a Member. Equally, one might be used to cover a much more extensive and expensive interaction. For example, a recent report by the Polaris Institute noted that former Liberal MP and current lobbyist Don Boudria organized a trip for four MPs and a Senator as guests of the Canadian gold mining giant Goldcorp. Fully complying with the existing regulations, Boudria reported the entire trip to the Commissioner for Lobbying on one communications report (sSee Cayley-Daoust and Girard, 2012: 10). Obviously, it would be helpful to be able to distinguish these very different kinds of contacts in the reporting process.

¹⁰ *Democracy Watch*, for example, has submitted a number of recommendations aimed at tightening up the regulatory requirements for lobbyists and DPOHs (Democracy Watch, May 17, 2012).

Table Five presents simple bivariate correlation coefficients (Pearson's r) testing the relationship between the constituency characteristics of MPs who have been approached by lobbyists on various specific subjects and the frequency of these approaches. The top section of the table focuses on the natural resource sector and explores for a variety of linkages between employment in particular resource-related sectors in ridings where MPs were approached by lobbyists on resource issues and a count of the number of times the MPs were contacted. Other things being equal, my expectation is that the more employment is concentrated on resource sectors across parliamentary ridings, the higher the count of times lobbyists should approach the MPs on resource-related issues. Lower portions of the table extend the test to look for relationships in other sectors and areas. The second two sections of Table Five extend the same general test to explore for the impact of concentrations of jobs in other employment sectors (health, financial, educational, transportation, manufacturing, or arts, culture, or recreation related sectors) or the characteristics of residents (in the case of the elderly, aboriginal Canadians, and immigrants) across ridings as they are related to the contacting of MPs. So the prevailing expectation is that if there is a strong 'constituency connection' underlying the lobbyist targeting of MPs, the correlation coefficients in Table Five should be positive and relatively large.

Table Five – Correlations between Total Lobbyist Contacts with Backbench MPs by Subject of Lobby and Selected Constituency Characteristics

(Pearson’s r coefficients)

	Agriculture Contacts (#)	Fisheries Contacts (#)	Forestry Contacts (#)	Mining Contacts (#)	Energy Contacts (#)	Primary Sector Contacts (#)
percent Employed in Agriculture, Forestry, and Fishing (2001)	.437	-.019	.216		-	.474
percent Employed in Mining and Oil/Gas Extraction (2001)	-	-	-	.176	.242	.202
percent Primary Sector Employment (2001)	.388	-.025	.182	.182	.334	.462
	Health Contacts (#)	Finance Contacts (#)	Education Contacts (#)	Transportati on Contacts (#)	Labour (#)	Pensions Contacts (#)
percent Employed in Health Services (2001)	-.039					
percent Employed in Financial Services (2001)		.096				
percent Employed in Education Services (2001)			.078			
percent Employed in Transportation & Warehousing (2001)				-.081		
percent Employed in Manufacturing (2001)					-.07	-.031
	Arts/Culture Contacts (#)	Aboriginal Affairs Contacts (#)	Pension- related Contacts (#)	Internationa l Relations Contacts (#)	TOTAL of ALL Single Subject Contacts (#)	
percent Employment in Arts, Culture and Recreation (2001)	.013					
percent Aboriginal Residents (ethnic origin, 2001)		.136				
percent Elderly (> 65 years) (2001)			-.031			
percent Immigrants (2001)				.141		
percent Margin of Victory, 2008 election					.106	

Source: Calculated from the Office of the Commission for Lobbying Digital Files for Monthly Communication Reports from all registered lobbyists. Restricted to backbench MPs from July 2008 – August 2011, and to lobby events recorded as involving a single subject matter.

The one possible exception to this general expectation of strong positive bivariate relationships pertains to the final test included in the table measuring the effect of political vulnerability of the MP and the total number of lobby approaches. Here, it seems possible that MPs who racked up larger victory margins at the preceding election (2008) would be *less* attractive than others as a target for lobbyist efforts since their MPs might feel less constrained to

appear to be open to constituency or other concerns and hence less open to efforts to persuade them. Those who survived close election races in 2008 might be more susceptible to approaches from lobbyists representing politically salient groups in their riding since the electorally vulnerable MPs might have the most personal incentive to cultivate group support in order to draw upon it to mobilize the votes of their members at a future election. So in this one test (reported at the bottom of Table Five) I expect to see a negative correlation coefficient if lobbyists are targeting electorally-vulnerable MPs, regardless of the topic of their approach. In other words, the larger the victory margin in 2008, the lower the number of lobby events involving MPs that is expected. However, a counter veiling logic may also be at work here, such that while those holding marginal seats may be more inclined to appear to be open to all representatives of organized interests who might help them cultivate a personal vote, they may also be reluctant to devote time to interests which are not directly related to segments of their electorate. This may lead them to be more selective in their willingness to be lobbied than those with the luxury of a comfortable margin of victory, and therefore the overall number of approaches accepted by MPs in marginal seats may be lower than others.¹¹

Looking at the first section of Table Five, we can see the correlations between employment in various natural resource areas or primary sectors. Unfortunately, the census reporting in these sectors that is available for federal electoral districts (FEDs) frequently aggregates jobs across several sectors, as in the case of employment in agriculture, fishing, and forestry. However, the subjects of lobby contacts could be isolated for each of these economic areas, so the top row of Table Five shows the correlation between employment in the three sectors and the number of MP contacts on each resource-related subject. Despite the crudeness

¹¹ I am particularly grateful to one of the CSPG's anonymous reviewers for this suggestion.

of the available measures, the results give some general support to the idea that constituency characteristics are significant in conditioning the attractiveness of MPs to certain interests. The positive correlations I expected are found in each of the bivariate relationships measured, with the exception of the contacting of MPs on fisheries issues. Only in the latter case is the employment profile of ridings in terms of agriculture, fishing, and forestry, or in terms of all primary sector industries combined, not positively related to the frequency of MP lobbies on related subjects. The aberrant results for the fisheries sector may reflect the fact that employment in this industry, though significant in limited areas of the country, is the smallest of the three primary sectors combined by Statistics Canada. It remains possible that there may be a stronger relationship on sector-specific lobbying that simply cannot be detected with the general sectoral employment measure available here.

For all the other lobbying subjects associated with natural resources and primary sector employment, the expected positive correlations were also found. In some cases, such the relationships involving contacting MPs on agricultural issues, the coefficients were modestly strong (hovering around .4). The coefficients found in the second row of the top section suggest that different concentrations of employment in mining and oil/gas extraction across ridings is modestly positively related to the contacting of MPs on energy and mining concerns. Finally, aggregating all primary sector employment sectors and all lobbyist contacts with MPs on primary resource sector subjects gives a relatively robust positive relationship (.462). Given that Canada's economy is heavily dependent on farming and resource extraction, evidence that riding variability on these issues is linked to the contacting of MPs by interest groups is potentially quite significant.

Unfortunately, the remaining tests for the constituency connection in the targeting of MPs by lobbyists do not generate similarly consistent estimates of constituency structuring. For example, none of the expected positive relationships that were uncovered were actually very strong – not one of the bivariate relationships measured that has a positive coefficient sees the coefficient reach even .1 (and only the measure for contacts involving finance topics and concentrations of jobs in the financial sector in the riding approaches that low mark). Moreover, in the case of health employment and health-related lobby contacts, transportation sector employment and transportation-related contacts, and manufacturing employment (which is expected to be more unionized than many other sectors, and hence potentially give rise to labour-related issues) with labour-related contacts, the generally weak correlation coefficients actually have a negative sign. Lobbying around health, manufacturing, or transportation does not appear to be targeted at MPs representing ridings with concentrated interests in these areas. Instead, these concerns appear to be too widely distributed across the entire Canadian population, in all corners of the country, to figure prominently enough in any subset of constituencies to draw the attention of lobbyists in the area. And once again, the crudeness of the measures on both sides of the relationship and the relatively small size of these sectors in terms of the riding's overall distribution of employment – should be recalled. However, note that the likelihood of measurement error means that these are very conservative tests – that is, the crudeness of the available measures makes the detection of even potentially strong relationships quite difficult.

Much the same can be said regarding the measured relationships involving differences in the residential composition of constituencies. Concentrations of elderly (above the age of 65) residents in ridings is not associated with increased lobbyist contact with MPs on pension issues (in fact, the coefficient is weakly negative). Nor does the presence of aboriginals in the

residential population of a riding exhibit anything more than a modest positive relationship (.136) with lobbyists contacting MPs on subjects concerning First Nations matters. Similarly, though it might be expected that ridings with significant immigrant populations might be more entangled in international affairs than others, the correlation between this feature of constituency residents and MP contacts dealing with international relations or international development is only .141. And turning to the final measure in Table Five – exploring whether electorally vulnerable MPs are more frequent targets of lobbyist attention than others – the results show that they are slightly less likely than their counterparts with larger victory margins to be lobbied. Though the correlation is weak (a coefficient of only .106), this suggests that either lobbyists do not effectively perceive or exploit the electoral vulnerability of MPs when seeking to exert influence, or alternatively that MPs with marginal seats may be more discriminating with respect to the interests they agree to meet, and thus show relatively lower total levels of contacting than their electorally-safer counterparts.

The foregoing admittedly presents only a very simple test for evidence of a constituency dimension to the lobbying activities of organized interests. Yet because the crude measures make the detection of relationships very difficult, the results provide some support for the view that at least some lobbyists representing particular interests in the policy process appear to consider the characteristics of MPs' constituencies when determining which MPs to approach. The importance of constituency influence is clearly strongest when lobbyists are looking for a potentially sympathetic ear on agricultural or resource-related issues. In these subject areas there appears to be a consistent, if modest, association of the constituency's resource character with the targeting of its MPs by lobbyists. Evidence supportive of a constituency connection in other policy areas is somewhat weaker, and in some cases not evident at all.

While constituency characteristics may alter the strategic value of a particular MP to a lobbyist with a particular interest to pursue, it is equally true that the available measures reveal a great deal of lobbying goes on that is not directed by considerations of constituencies. Other factors also play a role. One such possibility is that lobbyists focus their search for MPs to lobby by targeting the parliamentary committee closest to their interest of concern and reaching out to these members, either collectively through committee appearances or focused receptions and the like, or individually or in smaller group meetings. I explore this possibility in the next section of the paper.

Parliamentary Committee Membership and Lobbying Activity

While parliamentary committees have been a feature of the policy process in Canada since Confederation, until the late 1960s they were only intermittently effective. However, reforms to the committee system in 1968 have given the House of Commons, in the words of C.E.S. Franks (1987: 163), “...not only its comprehensive system of specialist committees covering the programmes of government, but a new assignment of responsibilities which ensured that they would meet frequently and occupy much of the time and energy of members of parliament.” Since the 38th parliament committee membership has been limited to 12 MPs from parties in rough proportion to their share of the seats in the House. In 2012 there were 24 standing committees covering a wide range of subject areas, providing the government’s backbench and opposition MPs with 288 openings to serve on these bodies –more than one committee assignment for each available MP. By most accounts, the burden of committee work for MPs is heavy, but there are substantial differences in the attention that members give to these responsibilities (Franks, 1987: 181).

Since their responsibilities were expanded in 1968 and they were permitted to call expert witnesses to prepare briefs and testify before meetings, committees have become primary sites for interest group influence. Grace Skogstad (1985: 745) has argued that "... the appearance of such witnesses before standing committees means that probably something close to the full spectrum of interests needing to be accommodated on a given policy matter will appear before a committee." Bruce Macnaughton's study of lobbying activity in the early 1970s found that 41 percent of MPs, the largest single grouping, identified committee meetings as the most significant forum for interaction with interest group representatives (followed by 33 percent who claimed that informal meetings were the most important venue for interacting with group representatives, and 20 percent claiming social affairs and phone calls filling this purpose) (Macnaughton, 1979: Table 3, p. 349). Certainly, committee activity flourishes on Parliament Hill (and occasionally elsewhere in the country if committees decide to visit in different locales). According to the annual report on standing committee activity for the fiscal year April 2011-March 2012, committees (and their subcommittees) met a total of 873 times and called a total of 2,579 witnesses (only some of whom would be registered lobbyists). These committee meetings offer lobbyists an important opportunity to interact with MPs who share an interest in and a responsibility for legislation in an area of mutual interest (eg., Curry, 2011).

There are at least three reasons to expect that lobbying activity will track committee memberships more closely than constituency characteristics. First, compared to non-members, MPs on parliamentary committee share an added level of responsibility for, and influence over, a defined policy area. Witnesses appearing before committees help educate MPs on their policy fields and over time committee members can develop considerable expertise themselves in their chosen areas. Committee members subject legislation to a detailed clause-by-clause review in a

less partisan environment than is often available. Committee members, therefore, constitute a logical priority target for all lobbyists who have a desire to influence policy in the subject area of the committee. Secondly, it is likely that the lobby contacts focused on here (single-subject issues only) are more likely to be directed toward a committee member than a non-member. This is because committee members constitute a more well-defined target on any given issue than an average non-member since, no matter how homogeneous, the ridings represented by MPs undoubtedly combine many interests of potential concern to lobbyists. Finally, MPs are known to seek out committee memberships that align generally with their constituency's defining features. For example, MPs from coastal ridings may seek out membership on the Fisheries Committee so as to be in a better position to advance their constituents in legislation pertaining to that industry (Raymond and Holt, forthcoming).¹² Therefore, in these cases lobbyists have at least two sources of incentives to approach particular MPs stemming both from the constituencies they represent and also from their committee status. Therefore, it is likely that some of the effect attributed to committee membership in the analysis of this section will actually reflect underlying constituency influences also – something I try to estimate in the next section.

Table Six reports a simple test of the significance of committee membership for lobbyist targeting by comparing the mean number of contacts on the subject matter of the parliamentary committee for members and non-members (with a t-test for the significance of the difference in means observed). If committee membership encourages contacts from lobbyists on the

¹² The simple correlations between employment in the natural resource sector and membership on resource-related committees are actually fairly modest. For the combined committees for 2010 and 2011, the correlation of employment in agriculture, fishing, and forestry and membership on the agriculture committee is .07; for the fisheries committee the correlation is .15; for the natural resources committee the correlation is .24. For employment in the mining and gas sectors, the correlation with membership on the natural resource committee is .09.

committee's subject matter, members should register significantly more contacts from organized interests than others. The results suggest that – with a couple of exceptions – this expectation is borne out – and in some cases, it is quite strongly supported. While membership on the Fisheries committee is not associated with a higher level of contacting on fisheries topics, this may be accounted for by the relatively small number of contacts made on these topics alone. Even Fisheries committee members reported less than a contact per session in each time period examined here (and over the two sessions combined that were examined here). Otherwise, other resource related committees (on Agriculture, Natural Resources, Environment) offer relatively convincing support for the notion that lobbyists are discriminating among MPs by targeting their efforts at members of relevant committees. The difference for members on the natural resources committee is on the order of 2 or 3 contacts on environmental issues for committee members for every contact on that subject for not members. The ratio of contacts for Natural Resource committee members as compared to non-members is even slightly higher when the subject of the communication is energy-related. While targeting of members of the environment committee on issues related to the environment is perhaps weaker than might be expected, the modest differences in the mean level of contacting between members and non-members is still statistically significant for the first session and for both sessions combined (the second session narrowly missing the .05 level of statistical significance). Clearly, in the important resource and environment sector, lobbyists are focusing their efforts on those MPs who are best positioned to advance their interests in the policy process.

Table Six – Mean Lobbyist Contacting by Committee Membership, 2010-2011

Committee (Issue Area of Lobby)	Mean # Lobbyist Contacts on Committee subject matter 2010 (p-value)	Mean # Lobbyist Contacts on Committee subject matter 2011 (p-value)	Mean # Lobbyist Contacts on Committee subject matter either parliament (p-value)
Agricultural & Agri-food Members	8.1	6.3	7.3
Non-Members (Agriculture Issues)	1.1 (.003)	1.24 (.008)	1.1 (.001)
Fisheries Members	0.5	.36	.36
Non-Members (Fisheries Issues)	.01 (.147)	.02 (.242)	.01 (.15)
Natural Resources Members	9.7	7.5	7.1
Non-Members (on Environmental Issues)	2.9 (.018)	3.0 (.098)	2.9 (.018)
Natural Resources Members	4.5	3.67	3.24
Non-Members (on Energy Issues)	.09 (.008)	.09 (.044)	.83 (.005)
Environment Members	4.1	1.1	2.9
Non-Members (Environmental Issues)	.5 (.005)	.06 (.289)	.44 (.004)
Health Members	16.3	10.5	11.6
Non-Members (Health Issues)	2.0 (.004)	2.3 (.01)	2.0 (.003)
Canadian Heritage Members	3.46	1.27	2.2
Non-Members (Arts, Culture, Recreation Issues)	0.39 (.015)	0.5 (.258)	.38 (.014)
Transportation, Infrastructure & Communities Members	9.42	2.36	6.18
Non-Members (Transportation Issues)	1.04 (0.18)	1.4 (.344)	.99 (.01)
Human Resources, Skills & Social Development Members	1.5	1.3	1.1
Non-Members (Labour Issues)	.12 (.142)	.13 (.13)	.1 (.05)
National Defence Members	.82	.2	.61
Non-Members (International Relations/Trade Issues)	.08 (.214)	.11 (.541)	.01 (.140)
International Trade Members	3.8	4.9	4.16
Non-Members (International Relations/Trade Issues)	1.8 (.042)	1.8 (.097)	1.71 (.026)
Foreign Affairs and International Development Members	4.5	2.46	3.2
Non-Members (International Relations/Trade Issues)	1.8 (.03)	1.9 (.055)	1.8 (.124)
Aboriginal Affairs Members	1.4	1.9	1.7
Non-Members (Aboriginal Issues)	1.5 (.892)	1.4 (.647)	1.4 (.697)

Interestingly, the largest differences in mean lobbyist contacting are found between members and non-members of the Health committee, where the ratio ranges from 5 to 8 contacts

on health-related topics for members for every one event recorded on the subject with non-members. This significant sector of the Canadian economy clearly also provides incentives for lobbyists to focus their efforts on the most policy-relevant legislators. More modest differences are found for the Transportation, Foreign Affairs, and International Trade committees (though the difference in mean contacting between members and non-members of these committees is not always statistically significant). Human Resources and Canadian Heritage committee memberships also reveal differences in mean contacting that are consistent with expectations (i.e., members receiving more contacts from lobbyists on committee-related subjects than non-members) but the differences are generally small and not always statistically significant. Similarly, differences in contacting attributable to membership on the National Defence Committee and the Aboriginal Affairs committee are too small to reach an acceptable level of significance to rule out the null hypothesis that the observed differences could have been generated by chance.

In sum, the results of the simple difference of means tests suggest that lobbyists are generally methodical and strategic in deploying their limited time and resources when contacting MPs. It does not appear that this activity involves simply contacting whoever is available without regard for their potential ability to advance the interest concerned. Rather, lobbyists active in many important policy sectors appear to prioritize contacts with MPs who are in the best position to advance the interests of their clients in the policy process. Taken together with the evidence produced earlier that suggests lobbyists also take account of the nature of the riding context represented by MPs when deciding which legislators to approach, there is considerable support in these analyses for the view of lobbyists as ‘talking chameleons’ – strategic actors whose operational ‘color’ adapts to significant features of their environment. This structuring

supports a revisionist view in which, in the eyes of professional persuaders, MPs are significant policy actors deserving of attention. On balance, and in line with expectations, the evidence for committee targeting by lobbyists is stronger and more consistent than the evidence reported earlier for the ‘constituency connection’. In part, this was expected because MPs representing ridings that are distinctive in some underlying feature of their economy or demography may be more likely to seek out membership on committees related to that feature, thereby giving lobbyists a double-incentive to approach them with their cause. So the question arises as to whether the evidence reported concerning the influence of constituency factors in structuring lobbyist contacting is the spurious result of the committee memberships of the MPs concerned. To see whether the two logics of lobbyist activity we have explored are really independent of one another, a multivariate test is required where the contribution of each set of factors is assessed while that of other factors is statistically controlled. Such a test is offered in the next section.

Constituency or Committee Influence? A Simple Multivariate Test

To give a general indication of whether lobbyists appear to be responding separately to the effects of constituency characteristics and committee membership, a multivariate regression analysis, in which measures of both the MPs’ constituency contextual characteristics and their membership on a parliamentary committees are included. In this type of analysis, the effects of either variable – constituency or committee membership - is assessed separately and with the influence of the other statistically controlled. Therefore, estimates of the effect on lobbying frequency of constituency factors control for the influence of committee membership, and *vice versa*.¹³ The multivariate framework also permits the inclusion of another possible determinant

¹³ It should be noted, however, that the multivariate tests presented here also assume that the influences of constituency and committee are independent and unrelated. Since we know that constituency influences are

of lobbyist contacting, that of incumbency. It is likely that lobbyists might target MPs from the governing party over opposition members regardless of the constituency or committee membership characteristics on the assumption that these legislators are best placed to influence policy (though Presthus' findings mentioned earlier do not support this expectation). To control for influences coming from membership in the incumbent governing party a dummy variable for Conservative members (scored 1 for Conservative MPs, and 0 for everyone else) is included in the models presented in Table Seven.

Table Seven presents the results of such a test for lobbying in agricultural and primary sector subject areas only. These subjects were selected for closer examination because they were associated with the strongest evidence of lobbyist targeting in both the analyses presented earlier in the paper – viz., exploring for constituency and committee membership influences. Once again, recall that because employment in these sectors is combined in the census data available for parliamentary constituencies, it is not possible to disaggregate lobbying activity for each of the particular sectors. The relatively stronger evidence of constituency structuring in these sectors as opposed to some others should not be entirely surprising. All Canadians, regardless of their constituency of residence, have an interest in health issues. All constituencies have elderly populations, students in educational programs, and arts, cultural, and recreational concerns. As such, lobby activities in these general areas less likely than employment in resource sectors (the salience of which varies widely and relatively obviously across constituencies) to evince strong constituency structuring. Thus while supportive evidence of constituency and committee

causally prior (i.e., they account in part for the attractiveness of particular committee assignments to MPs), it remains likely that some of the explanatory power attributed here to committee factors will in fact be generated by the constituency characteristics of the MP. A more complex two-stage estimation technique would be necessary to tease out the true sources of these effects, but with the crudeness of the measures at hand, it is best to emphasize the exploratory nature of these tests.

structuring of lobbyist contacting was uncovered in other subjects, the relatively strong and consistent pattern of influence that is plausibly attributable to *both* constituency measures and committee subject matter in the resource sector makes for a clearer test of their independent effects. For this reason, it is sensible to restrict attention here to the relative strength of constituency and committee influences on lobbying in the agricultural and natural resource sectors.

Table Seven – Exploratory Multivariate Test of Constituency, Committee, and Government Party Effects on Single-Subject Lobbies in the Resource Sector of Backbench MPs, 2010-2011
(OLS Coefficient/P-value)*

	Total # of Agricultural Lobbies	Total # of Primary Sector Lobbies (Agriculture, Fisheries, Mining, Natural Resources)	Total # of Primary Sector Lobbies (Agriculture, Fisheries, Mining, Natural Resources)
Constant	.48 (.011)	1.48 (.000)	1.44 (.000)
Conservative Dummy	-.07 (.82)	-.24 (.62)	-.20 (.68)
percent Agricultural, Forestry, and Fishing Employment	.17 (.000)	n/a	n/a
percent Primary Sector Employment (Agriculture, Forestry, Fisheries, Mining, and Gas/Oil Extraction)	n/a	.24 (.000)	.24 (.000)
Agricultural and Agri-Foods Committee Membership	5.31 (.000)	5.43 (.000)	5.48 (.000)
Fisheries Committee Membership	-.52 (.37)	-.33 (.73)	-.45 (.64)
Natural Resources Committee Membership	n/a	3.25 (.000)	3.23 (.000)
Environmental Committee Membership	n/a	n/a	.82 (.35)
Adjusted R-squared	.394	.329	.329

*Coefficients significant at $p < .05$ highlighted in bold type.

The empirical results for each of the three models of the determinants of lobbyist contacting in the agricultural and primary sector areas presented in Table Seven. They offer convincing evidence of the importance of *both* constituency and committee influences in

accounting for the distribution of lobbying activities. First, it is noteworthy that the three factors included in the general empirical model of lobbyist contacting in the agricultural and primary sectors collectively explain about a third of the total variance in the lobbying activity of MPs in these subject areas. Coefficients associated with the constituency employment in agricultural and primary sectors are statistically significant and robust in each model when other rival influences are controlled. These measures reveal that, *ceteris paribus*, for every one percent increase in employment in agriculture, forestry, or fishing, the number of contacts directed at MPs increases by .17. Similarly, for the broader measure of primary sector employment, for every increase of 1 percent the contacting of MPs goes up on average .24 times. These consistent and relatively strong findings offer confirmation that there is more to lobbying targeting strategy than committee or government membership. Equally, however, the results offer strong evidence of the significance of committee – but not government – membership. Lobbyists seeking to influence agriculture-related issues contact agricultural committee members 5 times more frequently than non-members, again with other influences controlled. Roughly the same ratio obtains for when primary resource sectors and lobbying subjects are combined. Clearly, lobby activity is not randomly distributed across all backbench MPs. Rather, there is convincing evidence that both constituency and committee membership are drivers of lobbying strategy on Parliament Hill, at least in the agricultural and primary sectors.

What is striking also in these findings, however, is the irrelevance of government membership once constituency and committee factors are taken into account. This confirms Presthus' seemingly paradoxical finding of the absence of statistically significant differences in the lobbying contacts of MPs from different parties mentioned earlier. Here it is important to remember that the focus is on 'single subject' lobby efforts only. With a focused objective in

mind, lobbyists are encouraged to concentrate on legislator targets whose profile on the subject of interest is perhaps most sharply defined – and the most logical components of that definition for the subjects covered here is either their riding characteristics or their committee membership. For more general or omnibus lobby efforts, government MPs may make more attractive targets for the contacting of organized interests simply because they are potentially in a position to be influential across a range of files. With this caveat noted, however, the analyses here clearly indicate that lobbyists are responding to a more nuanced set of targeting incentives than simple government/non-government considerations.

Conclusion

This paper has tapped into the rich store of information on lobbying activity aimed at MPs that has been accumulating in the monthly communication reports filed by lobbyists with the office of the Commissioner on Lobbying, primarily since September 2010 when MPs were included in the class of Designated Public Office Holders (DPOHs) for whom such reports are mandatory. These data bring into public light for the first time a comprehensive, objective depiction of the lobbying of MPs and the resulting picture is surprising and interesting. The picture is surprising because of the relatively high level of legislator contacting by organized interests that is going on in Ottawa. In a parliamentary system in which individual MPs have very little if any opportunity to alter policy outcomes, the priority attached to lobbying these individuals initially seems misplaced. Yet, upon closer examination, there is an identifiable underlying strategic foundation for at least some of this activity such that lobbyists appear to be seeking out legislators who are most likely to be sympathetic, and in a position to be influential, in areas of relevance to their clients. The analysis of ‘single-subject’ lobby contacts turns up strong evidence of both constituency and (especially) parliamentary committee membership

influences that appear to be guiding lobbyists' selection of their communication targets. While this evidence is strongest in a handful of sectors – agriculture, natural resources, and health, for examples – there is more general suggestive evidence of the influence of these factors in other areas as well. Moreover, multivariate tests on the agriculture/resource sector that also consider the effects of membership in the governing party suggest that these effects are robust and statistically independent of one another. While scholars may debate whether lobbyists are acting reasonably when they spend so much of their time and effort in contacting backbench legislators in the Canadian parliamentary system, the analyses presented in this paper suggest that they are strategic and systematic in organizing these communication activities. The patterns revealed suggest that they are sensitive both to features of the representational contexts associated with particular MPs, and to their parliamentary committee assignments. Accordingly, with clear evidence of strategic targeting in hand it is difficult to simply dismiss their efforts in this regard as being simply misguided or unrealistic.

The analyses presented in this paper suggest that lobbyists are indeed acting like chameleons, shaping and focusing their communications according to significant features of their political environment. Evidence from the MP 'exit interviews' suggests that MPs themselves are mindful of these factors as they reflect upon their experience on the receiving end of lobbyist contacts. Of course it remains possible that some of the lobbying activity directed at MPs and Senators may be untargeted and opportunistic. However, the analyses of this paper suggest that a good deal of it is strategically-guided and purposeful. The analyses presented here focus on 'single-subject' lobby contacts, a significant but small subset of all recorded lobby contacts. In doing so, I have uncovered evidence of structuring in what is arguably the subset of all contacts for which the targeting logic is most likely to be observable. That said, however, it is impressive

to see a relatively clear pattern emerge from the assembled lobbyist records in part because the subject categories are extremely broad and the reporting is likely to be subject to some significant variation in the descriptions recorded for lobbying activities that is related primarily to the thoroughness or accuracy of the person completing and submitting the reports. It is not difficult, for example, to imagine situations where a lobby meeting on the oil sands might be coded as having ‘environment’ as the subject, or ‘energy,’ or perhaps even ‘regional development’ or ‘infrastructure’. In other words, while the monthly communication records contain a wealth of useful information, they are also likely to be a repository of significant measurement error. As a result, the foregoing tests have been very conservative in nature – the very crudeness of measures makes it extremely difficult to find any significant pattern. Focusing on single-subject lobby contacts does not completely avoid this problem, but the fact that relatively clear signals of strategic structuring of these contacts can be extracted from such noisy data offers encouragement that the underlying logic of the hypothesized sources of this structure is actually present. While the analysis presented above is suggestive, it remains for further research to determine whether these factors are also instrumental in guiding lobbyist strategy in multiple-subject lobbies.

All of this suggests that I have just scratched the surface with this paper and that further research into the apparently paradoxical centrality of legislators to the world of Ottawa-based lobbyists is necessary. This analysis equally suggests that such further research is likely to be fruitful in that the structuring observed in the activities focused on in this paper suggests that this activity is non-random and unlikely to be the product of lobbyists simply talking to anyone who will give them the time of day. While the analysis of the monthly communication reports can provide a meaningful backdrop for appreciating the breadth and strategic nature of lobbyist

communications in the legislative process, and there is undoubtedly more insight to be extracted by further analyses of the patterns they reveal, it may be also instructive to use the insights drawn from these statistical analyses to inform an interview-based study in which lobbyists themselves are asked to outline their strategic rationale in contacting particular MPs on specific subjects. Perhaps only when insights from both these sources of data are in hand will we be in a position to fully address the question of why ordinary MPs are so sought after by organized interests.

References

- Bennedsen, Morten, and Sven E. Feldman. 2002. "Lobbying Legislatures," *Journal of Political Economy*, 110, 4, pp. 919-946.
- Canada. Commissioner of Lobbying of Canada. *Annual Report, 2009-10*. <http://ocl-cal.gc.ca/eic/site/lobbyist-lobbyiste1.nsf/eng/nx00464.html#institut> (accessed January 31, 2011)
- Canada. House of Commons. 2012. *2011-2012 Annual Report on Committee Activities and Expenditures*, Ottawa: Committees and Legislative Services Directorate (June) http://www.parl.gc.ca/About/House/WitnessesGuides/Annual_percent20Report_percent202011-2012_percent20- percent20e_percent20FINAL.htm#_Toc323825538 (accessed November 1, 2012).
- Carty, R. Kenneth, and Munroe Eagles. 2005. *Politics is Local: National Politics at the Grassroots*, Toronto: Oxford University Press.
- Cayley-Daoust, Daniel, and Richard Girard. 2012. *Big Oil's Oily Grasp: The Making of Canada as a Petro-State and How Oil Money is Corrupting Canadian Politics*, Ottawa: Polaris Institute, (December). <http://www.polarisinstitute.org/bigoilsoilygrasp> (accessed February 6, 2013).
- Curry, Bill, 2011. "Finance Committee is Lobbyists' Target," *The Globe and Mail (Toronto)*. (November 24), P. A-4.
- Democracy Watch. 2012. "News Release: House Committee Recommends Some Key Changes to Strengthen Federal Lobbying Act and Enforcement System, But Fails to Address Huge Loopholes that Allow Secret, Unethical Lobbying of the Federal Government," (May 17). <http://democracywatch.ca/20120517-reismay1712/> (accessed February 6, 2013)
- Eagles, Munroe. 1998. "The Political Ecology of Representation in English Canada: MPs and Their Constituencies," *American Review of Canadian Studies*, 28, 1 (Spring-Summer): 53-79.
- Munroe Eagles, Royce Koop, and Alison Loat. (forthcoming, 2013). "MPs on the Home Front: How Constituency Characteristics Influence Representational Approaches," in Elisabeth Gidengil and Heather Bastedo, eds., *Canadian Democracy in the 21st Century*, Vancouver: University of British Columbia Press.
- Franks, C.E.S. 1987. *The Parliament of Canada*, Toronto: University of Toronto Press.
- Franks, C.E.S., 2007. "Members and Constituency Roles in the Canadian Federal System," *Regional and Federal Studies*, 17, 1 (March): 23-45.
- Holmes, Nancy, and Dara Lithwick. 2011. *The Federal Lobbying System: The Lobbying Act and*

the Lobbyists' Code of Conduct, Ottawa: Parliamentary Information Service, Background Paper, Publication No. 2011-73-E (Revised June 28).

Jackson, Robert J., and Michael Atkinson. 1974, *The Canadian Legislative System*, Toronto: Macmillan of Canada.

"Lobbyists Get New Rules," *The Toronto Star*, Tuesday, Sept. 21, 2010: A-6

Malvern, Paul, 1985. *Persuaders: Influence Peddling, Lobbying and Political Corruption in Canada*, Toronto: Metheun,

Macnaughton, Bruce 1979. "Canadian Parliamentarians and Interest Group Effectiveness," in Jean-Pierre Garboury, ed., *The Canadian House of Commons Observed: Parliamentary Internship Papers*, Ottawa: University of Ottawa Press, pp. 347-374.

Naoi, Megumi, and Ellis Krauss. 2009. "Who Lobbies Whom? Special Interest Politics under Alternative Electoral Systems," *American Journal of Political Science*, 53, 4 (October): 874-892.

Presthus, Robert. 1971. "Interest Groups and the Canadian Parliament: Activities, Interaction, Legitimacy, and Influence," *Canadian Journal of Political Science*, 4, 4 (December): 444-460.

Presthus, Robert. 1973. *Elite Accommodation in Canadian Politics*, Toronto: Macmillan.

Pross, A. Paul. 1992. *Group Politics and Public Policy*, 2nd ed., Toronto: Oxford University Press.

Raymond, Christopher, and Jacob Holt. forthcoming. "Due North? Do American Theories of Legislative Committees Apply to Canada?" *Journal of Legislative Studies*.

Samara Canada. 2012. "MP Exit Interviews, 2009-2012," Unpublished interview transcripts. (See <http://www.samaracanada.com/what-we-do/mp-exit-interviews> for a description of this important project).

Savoie, Donald. 2008. *Court Government and the Collapse of Accountability in Canada and the United Kingdom*. Toronto: University of Toronto Press.

Shepherd, Karen E. 2011. "Lobbying Legislation in Canada: Ensuring Transparency," Remarks at the Johnson-Shoyama Graduate School of Public Policy, Regina, Saskatchewan, (October 27) <http://ocl-cal.gc.ca/eic/site/012.nsf/eng/00543.html> (accessed September 28, 2012)

Skogstad, Grace. 1985. "Interest Groups, Representation and Conflict Management in the Standing Committees of the House of Commons," *Canadian Journal of Political Science*, 18, 4 (December): 739-772.

Thompson, Fred, and W.T. Stanbury. 1979. "The Political Economy of Interest Groups in the Legislative Process in Canada," Occasional Paper No. 9, Montreal: Institute for Research on Public Policy, (May).

Thurlow, W. Scott. 2010a. "Some Observations on the State of Lobbying in Canada," *Canadian Parliamentary Review*, (Summer): 43-45.

Thurlow, W. Scott. 2010b. "New Obligations of MPs Under the Lobbying Act," *Canadian Parliamentary Review*, 33, 4 (Winter): 46-47.

VanLoon, Richard, and Michael S. Whittington. 1976, *The Canadian Political System: Environment, Structure, and Process*, 2nd ed., Toronto: McGraw-Hill Ryerson.