



Government
of Canada

Gouvernement
du Canada

Registrar
of Lobbyists

Directeur
des lobbyistes

Ottawa, Canada
K1A 0R5

PROTECTED AND CONFIDENTIAL

MAY 31 2007

Mr. Duff Conacher
Coordinator
Democracy Watch
1 Nicholas Street, Suite 420
P.O. Box 821, Postal Station B
Ottawa, Ontario
K1P 5P9

Dear Mr. Conacher:

As you are aware, the Democracy Watch complaint against Mr. John Dossetor, initially filed with the former Office of the Ethics Counsellor, was transferred to the Office of the Registrar of Lobbyists for examination.

In your letter dated April 12, 2001, you allege that Mr. Dossetor was in breach of both the Act and the Code by failing to register as a lobbyist after accepting the position of Vice President Government Affairs at Monsanto Canada Inc.

My office has now completed an administrative review of the allegations and I wish to inform you of the findings. The review focussed on complaints relating to the *Lobbyists Registration Act* (the Act) and the *Lobbyists' Code of Conduct* (the Code) and not the *Conflict of Interest and Post Employment Code for Public Office Holders*. As you know, responsibility for examining issues related to public office holder conflicts of interest rests with the Ethics Commissioner.

The review involved the examination of information contained in the Ethics Counsellor's file, media articles and other open source information, and documents provided by Mr. Dossetor shortly after an interview we conducted with him at Monsanto Canada.

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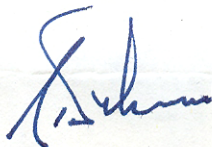
During the period in question, in-house (corporate) lobbyists were required to file a return with the Registrar if, among other things, they communicated with public office holders in an attempt to influence the development or amendment of any regulation, policy or program, and communication of that nature comprised a significant part of their duties. These lobbyists were required to file the return within 2 months of the date on which their lobby activities commenced being a significant part of their duties.

Mr. Dossetor registered as a lobbyist on May 18, 2001. He began his employment with Monsanto Canada on February 3, 2001. Based on the information gathered during the course of the review by my office, I am satisfied that during the period February 5, 2001 and March 18, 2001 (two months before he registered) Mr. Dossetor was not required to file a return under the *Lobbyists Registration Act*. Although he was employed by Monsanto Canada to develop and implement their government affairs strategy in Canada, there is no basis to conclude on reasonable grounds that, during the period in question, communication with public office holders in respect of any of the matters described in subsection 6(1) of the Act became a significant part of his duties.

Until lobbying became a significant part of his duties, Mr. Dossetor was not bound by the standards of conduct outlined in the Code. Moreover, we have found no evidence that, once registered, he failed to comply with the principles and rules set out therein.

In view of this, a formal investigation pursuant to subsection 10.4(1) of the Code will not be undertaken.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Michael Nelson", is written over a light blue circular stamp.

Michael Nelson
Registrar of Lobbyists