COIC
Conflict of Interest Commissioner
SASKATCHEWAN

Annual Report of the Saskatchewan Conflict of Interest Commissioner and Registrar of Lobbyists

2025-2026

Office of the
Registrar of Lobbyists
Saskatchewan

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Saskatchewan

COIC
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July 31, 2026

The Honourable Todd Goudy
Speaker of the Legislative Assembly of Saskatchewan
Room 129 Legislative Assembly Building
2405 Legislative Drive
Regina, SK S4S 0B3

Dear Mr. Speaker:

I have the pleasure and honour to present to you the *Annual Report of the Conflict of Interest Commissioner and Registrar of Lobbyists* for the period of April 1, 2025, to March 31, 2026.

This Report is submitted pursuant to Section 25 of *The Members' Conflict of Interest Act*, Chapter M -11.11, Statutes of Saskatchewan, 1993.

Yours respectfully,

M. Herauf

Honourable Maurice Herauf, K.C.
Saskatchewan Conflict of Interest Commissioner
and Registrar of Lobbyists

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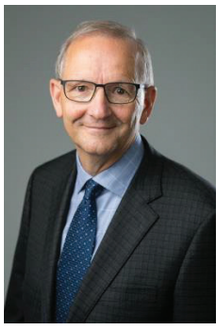

Maurice Herauf, K.C.
Saskatchewan Conflict of Interest Commissioner
and Registrar of Lobbyists

COMMISSIONER AND REGISTRAR'S MESSAGE

I have completed my first year of my second five-year mandate as Conflict of Interest Commissioner and Registrar of Lobbyists.

Fiscal year 2025-2026 was more of a "normal" year for my office. The 31 members elected in the October 2024, provincial election have some experience under their belts so speak. As a result, the number of requests for advice and recommendations to my office from members diminished a bit. As well, the one-year statutory time period for the 31 former members to utilize the services of my office expired on October 31, 2025.

Both of these factors resulted in a reduction in requests for guidance from my office. This reduction permitted our two-person office to attend to matters that required our attention but had been postponed due to the large number of requests from former and new members that had to be dealt with somewhat expeditiously.

I commend both former and current members for their thoughtful and respectful encounters with my office over the fiscal year. This cooperation resulted in 100 percent compliance from all members with the statutory requirement for financial disclosure and consultation with the Commissioner.

My second mandate as Registrar of Lobbyists remains steady. We continue to perform outreach activities with organizations and lobbyists in our efforts to raise awareness of the *Lobbyists Act*. Additionally, we conducted our first ever inquiry into a potential breach of the *Lobbyists Ac*t. This inquiry was undertaken as a result of a complaint received from a member of the public.

Overall, I have been pleased with the proactive measures taken by both members and lobbyists and look forward to continuing these beneficial arrangements going forward.

MANDATES

The Legislative Assembly is assisted in its duties by many officers who fulfill a variety of roles. These include the Officers of the Legislative Assembly who assist the Legislative Assembly in making government accountable and responsive to the public. These officers help to monitor government spending, assist individual citizens with concerns about their treatment by government entities, protect the interests of children, receive concerns about the release of government information and other privacy matters and assist Members of the Legislative Assembly to avoid conflicts of interest.

Conflict of Interest Commissioner

Since 1993, Members of the Legislative Assembly of Saskatchewan have been governed by legislation regarding their conduct as members. *The Members' Conflict of Interest Act* includes specific prohibitions regarding conflicts of interest and the use of insider information. It regulates member participation in government contracts and provides general disclosure requirements for all members.

The Commissioner performs a variety of roles under the *Act*. One such role is that of assisting members in understanding their obligations under the *Act*.

To assist in the understanding of their obligations the Commissioner may provide written advice or recommendations. The Commissioner is also available to meet with members to clarify this advice when requested or required.

Each year, members must complete and file a confidential disclosure statement with the Commissioner. From the detailed private disclosure statements, the Commissioner prepares public disclosure statements. The public disclosure statements are deposited with the Clerk of the Legislative Assembly and are available on-line for public inspection.

After filing a private disclosure statement, the member and, if available, the member's spouse must meet with the Commissioner to ensure that adequate disclosure has been made and to obtain advice on the member's obligations under the *Act*.

The Commissioner may determine that the advice and recommendations provided to individual members have a broader general application and may therefore provide the advice as guidelines to all members.

The Commissioner may also conduct investigations and inquiries under the *Act*. In essence, it is the responsibility of the Commissioner to ensure that each Member of the Legislative Assembly maintains a high standard of ethical conduct.

Registrar of Lobbyists

In 2014, *The Lobbyists Act* established that the Conflict of Interest Commissioner would also serve as Saskatchewan's Registrar of Lobbyists. In August 2016 the Saskatchewan lobbyists act came into force.

The Office of the Registrar of Lobbyists is responsible for designing, implementing and operating the province's lobbyist registry, promoting and educating the general public, stakeholders and the lobbyist community about the *Lobbyists Act*, and ensuring compliance and conformity of lobbyists to the *Lobbyists Act*.

The Registrar provides directions to lobbyists and may conduct an investigation if there is reason to believe one is necessary to ensure compliance with the *Act*. The Registrar also has the authority to level an administrative penalty up to $25,000 on those who are found to be in breach of the *Act*.

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RESPONSIBILITIES OF THE CONFLICT OF INTEREST COMMISSIONER

The duties of the Commissioner are to:

- Act as an advisor to members to ensure they meet their obligations under the *Act*;
- Meet with each member at least annually to review the disclosure of the member's financial interests;
- Gather information in response to requests made under the *Act*; and
- Undertake a formal inquiry into alleged contraventions of the *Act*.

OBLIGATIONS OF MEMBERS

Persons elected to the Legislative Assembly of Saskatchewan are subject to statutory obligations designed to avoid any conduct that may constitute a conflict of interest on the part of the member. These statutory obligations are set forth in *The Members' Conflict of Interest Act* (the *Act*).

Members are prohibited from using information that they have acquired as Members of the Legislative Assembly and which is not available to the general public, for the purpose of advancing their private interests or the private interests of a family member or associate.

Additionally, a member must not use his or her position to influence other decision makers to advance the private interest of the member, his or her family or an associate.
Members are prevented by statute from accepting, except in specific circumstances, any gifts or benefits offered to them in respect to carrying out of the member's duties.

A MEMBER MUST AVOID DOING THE FOLLOWING:

- Participating in a Government Contract except those contracts exempted by Section 15(6) of the *Act* or those approved by the Commissioner pursuant to Section 16 of the *Act*.
- Making a decision or participating in the making of a decision in the execution of his or her office while at the same time knowing that in the making of the decision, there is the opportunity to further the Member's private interest or the private interest of a Member's family or the Member's associate (Section 3)
- Using information that is gained in the execution of his or her office and which information is not available to the general public to further or seek to further the Member's private interest or the private interest of the Member's family or the Member's associate (Section 4).

ADVISING MEMBERS

The Commissioner's primary role is that of an advisor to members. He encourages all members to consult with him at the earliest possible opportunity if they have questions or concerns about their obligations so that a potential conflict of interest can be avoided.

Requests for opinions come in various forms. Members may have an informal conversation with the Commissioner or may make a formal request for a written response. After inquiry and research, the Commissioner provides an opinion as to whether there is a conflict. If a member has or may have a conflict of interest, the Commissioner can make recommendations specifying a timeframe for compliance.

ADVICE AND OPINIONS FROM THE COMMISSIONER

The Conflict of Interest Commissioner receives enquiries on an interesting variety of matters. For a majority of citizens of the province these matters would pose no real or perceived problem. Members of the Legislative Assembly, however, must deal with matters through a different lens and they rely on this office for guidance.

This is particularly true for new members and the Conflict of Interest Commissioner ensures that he discusses the obligations, responsibilities and expectations of their new role regarding *The Members' Conflict of Interest Act*.

As cabinet responsibilities change and duties of other government and opposition members are reassigned, MLAs seek advice to avoid any real or perceived conflicts with their new responsibilities.

Consultations can be initiated through formal means, such as a letter or by a phone call or email enquiry. Either avenue of initiating a consultative conversation reinforces the commitment of members to abide by the spirit and intent of the *Act*.

I encourage all members to check out our website as it was designed specifically with members in mind and contains helpful information on a large number of topics that this office routinely gets requests to provide advice on.

Although advice can be provided on any topic, in general, advice sought can be characterized within the following categories:

Gifts

Inquiries concerning gifts include whether they can be accepted and under what circumstances.

Eligible gifts received from a single source must be reported when the value is $200 or more for a single gift or the cumulative value of gifts from a single source reaches that threshold.

Outside Activities

The Office has received inquiries regarding outside activities concerning volunteer board activities in community organizations, sponsoring charitable events and attendance at events.

Reporting and Disclosure

What is required to be disclosed to the Commissioner and what becomes public generates a fair number of inquiries. Assets of private companies held by members have always had to be disclosed to the Commissioner but not to the public.

Business and Financial interests

Becoming an elected member sometimes requires a significant change to a member's former career. This office dealt with a large number of questions from members about investments, business dealings and government contracts involving the member or their family. Businesses and partnerships, contracts, investments and other financial interests must be disclosed to the Commissioner.

Family

The definition of family, with respect to a member, means the member's spouse and dependent children. Over the past year questions regarding family members have involved a myriad of issues including the employment or volunteer activities of a spouse, child or other family members.

Taking part in decisions

Members often seek advice on when it is appropriate to participate in a decision before the Legislative Assembly, the Executive Council or one of their respective committees. Questions related to personal investments tend to be the most often asked question of the Commissioner.

Contracts

The office receives a large number of inquiries regarding government contracts and a member's ability to retain current contracts (for those who are newly elected) or enter into new contracts. Generally, all members are prohibited from participating in government contracts.

Understanding Section 15 of *The Members' Conflict of Interest Act* is especially important for members to ensure they fully comprehend what is and is not allowed once they are elected. It reads as follows:

Prohibition of participation in government contracts

s.15 (1) … government contract means a contract entered into with the Crown for any purpose, and includes any contract for:

a) the supply to or by the Crown of any goods or services;

b) the sale, lease or other disposition of any real property to or by the Crown;

c) the construction of any public work for the Crown;

d) the determination of compensation, or damages with respect to real property taken, damaged, or purchased by the Crown;

e) the determination of compensation or damages to be paid by the Crown in cases not provided for in clause (d); or

f) the lending of money to or by the Crown.

(3) in this section and in sections 16 and 17, a member participates in a government contract where the member;

a) is, or has a right to become, in the member's personal capacity, a party to or beneficially interested in the contract; or

b) is a shareholder, partner, director, manager or officer of, or has an interest in, a business that;

i. is, or has a right to become, a party to or beneficially interested in the contract; or

ii. has a subsidiary which is, or has a right to become, a party to or beneficially interested in the contract.

(5) except as specifically provided in this or any other Act, no member shall participate in a government contract.

Section 3 of the Regulations has recently been amended to update the list of exemptions from section 15 of the *Act*. This update removed or clarified references to legislation that no longer exists or has been renamed, along with removal of references that are outdated.

EXEMPTIONS

The ban against members participating in a government contract is subject to exemptions with the Commissioner's approval. The first exemption is contained in s.16 of *The Members' Conflict of Interest Act* and applies to current members. The second exemption is contained in s.34 of the *Act* and applies to former members of Executive Council.

Both provisions contain a two-part test that must be satisfied before the Commissioner can exempt the member or former members from participating in a government contract.

There were no exemption requests for the 2025-2026 year.

PUBLIC DISCLOSURE

Members of the Legislative Assembly are required to file a Member's Private Disclosure Statement with the Commissioner every year by March 31. After a general election or a by-election that statement must be filed within 90 days of being elected.

Amendments to *The Members' Conflict of Interest Act* passed in 2020 now also require former members to file a final disclosure statement within 60 days from when they ceased to be a member.

Once again, I am pleased to report that all members complied with the requirement to file a private disclosure statement by the date specified in the *Act*.

I reviewed all private disclosure statements with each member in person. All interviews were
I reviewed all private disclosure statements with each member in person. All interviews were
completed by May 2026.

Public Disclosures for all members can be viewed on the Legislative Assembly of Saskatchewan website at: https://www.legassembly.sk.ca/mlas/mla-disclosure-statements

GIFTS

All members receive a booklet called “Accepting and Disclosing Gifts: A Guide for Members”.

We strive to remain current and up to date on topics and issues that members experience in their daily work and personal lives.

As to when a member can accept gifts is an ongoing concern.

The legislation provides that members are permitted to accept only those gifts or benefits that are received as an incident of protocol or social obligations that normally accompany the responsibilities of office. This applies to gifts given to the member either directly or indirectly. In the absence of protocol or social obligation, the gift is not allowed under section 7 of the *Act*.

This year the subject of gifts was of particular concern. My office spoke at length to a large number of members about the gift provision in the *Act* and clarified what is and is not acceptable.

When determining whether to accept a gift, the starting point is not the value of the gift. Just because a gift is valued under $200 does not mean it can be accepted. This is the threshold for disclosure purposes, not acceptability.

Anytime a member is offered a gift, the member must first consider whether it meets the exception set out in the *Act*. If it does not, or if there are other factors that might suggest the gift has been given in order to influence the member or is otherwise inappropriate, the gift must be declined or returned to the donor.

***The Lobbyists Act* also contains a gift prohibition that Members should familiarize themselves with.**

EDUCATION - 2025 ANNUAL CONFERENCE

CCOIN (Canadian Conflict of Interest Network) is comprised of the various Integrity and Conflict of Interest Commissioners across the country at the federal, provincial and territorial levels of government and primarily those who have jurisdiction over members of legislative bodies.

The organization meets on an annual basis to discuss issues of common interest and to seek the advice and view of colleagues concerning matters related to conflicts of interest and ethics in our changing society.

The 2025 Annual conference was held in Victoria, British Columbia

Representatives from the Federal, Provincial and Territorial jurisdictions attended the conference. It was a lively and informative agenda that included a discussion on judicial review of commissioner's opinions, blind trusts and a presentation from Quebec on the Standard of Proof required when conducting an investigation or inquiry. These topics contribute to the consideration of best practices in every jurisdiction.

COGEL

The office is also an active member of the Council on Governmental Ethics Laws organization. COGEL is a professional organization for government agencies and other organizations working in ethics, elections, freedom of information, lobbying, and campaign finance. COGEL meets annually with the purpose of facilitating the exchange of information and best practices with presentations, discussion forums and planning sessions led by respected professionals in North America, and sometimes internationally.

We did not attend the conference this year due to other fiscal commitments.

Office of the
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Saskatchewan

DID YOU KNOW?

The Saskatchewan Lobbyists website is a comprehensive resource designed to help stakeholders understand lobbying requirements and promote transparency in government decision-making. The site features three dedicated landing pages tailored to the needs of the key groups we serve—lobbyists, public office holders, and members of the public. Each page provides information relevant to that audience, including guidance on legislative requirements, registration obligations, educational resources, frequently asked questions, and practical tools to support compliance with Saskatchewan's lobbying framework.

In addition to serving as an information hub, the website provides access to the Saskatchewan Lobbyists Registry, the public database where active lobbyists register and report their lobbying activities. Through the registry, users can search and view current lobbying registrations, helping to ensure openness and accountability in interactions between lobbyists and public office holders. By combining educational resources with public access to registration information, the website supports informed participation in Saskatchewan's democratic processes and reinforces public confidence in government transparency.

https://www.sasklobbyistregistry.ca

HISTORY

The Saskatchewan lobbyists legislation came into force on August 23, 2016.

The purpose of *The Lobbyists Act* is to enhance the integrity and accountability of government by fostering openness and transparency about who is attempting to influence decisions made by provincial public office holders.

In Saskatchewan lobbying may be done by consultant lobbyists or in-house lobbyists. If you are characterized as a lobbyist, you must create an account on the Lobbyist Registrar's website and then regularly disclose details of your lobbying activities with provincial public office holders by registering this information on the lobbyists' registry. This information becomes available to the public as soon as it has been accepted by the Registrar.

OBLIGATIONS OF PUBLIC OFFICE HOLDERS

The Saskatchewan lobbyist database is an online tool which allows interested parties to search and discover who is lobbying whom in the Saskatchewan public service. Targets of communication can include elected members of the Saskatchewan Legislative Assembly, its staff, and senior members of government ministries, as well as Crown Corporations and some Boards.

***The Lobbyists Act* does not place any obligation on public office holders to report communication or association with lobbyists.**

All reporting requirements are the responsibility of lobbyists. The *Act* contains compliance measures and quite severe penalties should a lobbyist be found non- compliant with the *Act* and its reporting requirements.

INTERJURISDICTIONAL COOPERATION

The Lobbyists Registrars and Commissioners Network (LRCN) is an informal group of commissioners and registrars from Canadian jurisdictions at the federal, provincial/territorial and municipal levels who administer and supervise the lobbying regimes in their respective jurisdictions. Two municipal jurisdictions, Ottawa and Toronto have been grandfathered into this organization, recognizing their experience and history within the lobbying context. The LRCN has a long-standing practice of sharing information, legislative developments, and best practices in the conduct of our respective responsibilities.

Registrars, commissioners, and their staff meet twice a year, including one meeting in person. This meeting is usually held in the fall in a different jurisdiction. Discussions include updates on jurisdiction developments, trends, and issues of the day.

We may also meet via conference call(s) throughout the year to discuss important matters as they arise.

The 2025 LRCN Conference was held in New Brunswick.

The agenda featured several unique and thought-provoking topics that generated extensive discussion among attendees. Of particular interest was the issue of whether consultant lobbyists should be required to disclose government funding received by First Nations and Indigenous clients. While participants engaged in a thorough exchange of perspectives, no consensus was reached. As a result, each jurisdiction agreed to undertake further research and consideration of the matter, with a commitment to continue the discussion at the 2026 conference.

LOBBYING NEWS

It is important to remember that lobbying is an integral part of the democratic process and to lobby public officer holders is a legitimate activity in a democratic system of free and open access to government.

Lobbying creates a forum to discuss adverse points of view and the opportunity for the public office holder to discern additional information that may assist them in making an informed decision.

The Lobbyist Registry saw modest growth in registrations during this fiscal year, consistent with recent years. This year saw a number of former members and chiefs of staff enter the lobbying field. This coincides with the ending of their respective cooling off periods.

INQUIRIES AND INVESTIGATIONS

This year, the Office conducted its first inquiry into a potential breach of lobbying legislation. The matter arose after a member of the public raised concerns that a former public office holder may have been engaging in lobbying activities before the expiration of the applicable cooling-off period and without being properly registered.

Every person has the right to become a lobbyist, provided they meet the requirements and register according to the legislation

Following a review of the circumstances, the Office concluded that while the individual had communicated with former colleagues, those interactions were personal rather than lobbying in nature and therefore did not require registration. Nevertheless, the Office reminded the individual of the obligation to register any future lobbying activities and cautioned against engaging in lobbying without the required registration.

TRAINING AND EDUCATION

As part of a proactive approach to achieving compliance with the *Lobbyists Act*, the office continues to provide training and education sessions to lobbyists, public officer holders and other interested stakeholders.

Over the past year, the office was invited to present at a variety of forums to educate and inform stakeholders about The *Lobbyists Act* and its role in promoting transparency and accountability in Saskatchewan. These outreach opportunities provided valuable occasions to increase awareness and understanding of lobbying regulation within the province.

In 2023, the office was approached by the Paul J. Hill and Kenneth Levene Schools of Business, Faculty of Business Administration, to deliver a class on ethics and lobbying. We are pleased to continue this partnership and to contribute to the development of future business leaders through discussions on ethical conduct, public policy, and the lobbying process.

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BUDGET

The fiscal year for the office runs from April 1, 2025 – March 31, 2026.

Conflict of Interest Commissioner and

Office of the Registrar of Lobbyists

Budget Summary

For Fiscal Year 2025-2026

Object of Expenditure Breakdown	2025-2026
Personal Services	$447,000
Contractual Services	$95,000
Communications	$1,500
Travel & Business	$15,600
Supplies & Services	$19,400
Equipment & Assets	$ 16,500
	$595,000

ACKNOWLEDGMENTS AND APPRECIATION

OUTSIDE ASSISTANCE

As a two-person office, we rely on support and assistance from various branches of the Legislative Assembly. I wish to acknowledge and sincerely thank Information Technology Services, Member Services and Financial Services for their expert advice and outstanding guidance and assistance throughout the year.

OFFICE STAFF

I would be remiss if I did not express my sincere gratitude to Saundra Arberry, Deputy Registrar for her tremendous assistance during my term as Commissioner/Registrar.

As you know Saundra was appointed Deputy Registrar in 2015 with the inception of the passing of *The Lobbyists Act*. She has been instrumental in establishing and managing the office, administering the legislation and lobbyist registry and assisting in my conflict of interest mandate. She is a talented and valuable resource and appreciated colleague.