

November 20, 2017

The Honourable Selina Robinson
Minister of Municipal Affairs and Housing
Parliament Buildings
Victoria, BC
V8V 2C2

Dear Minister Robinson:

On behalf of the Executive, I wanted to extend our thanks for taking the time to meet with UBCM on November 16th. We continue to be appreciative of your work in reaching out and engaging with UBCM.

In follow up to our meeting, we committed to getting back to you with our thoughts and comments on Bill 15 – Local Elections Campaign Financing Amendment Act.

There are two themes that we have heard since the legislation was introduced.

First, there are concerns that the positive intent of removing big money from local government elections will be mitigated unless accompanying rules on third party organizations are also considered. Specifically, we are concerned that contributions that would have been directed to campaigns could be pushed into the shadows through third party organizations.

And secondly, we have also heard significant concern about the potential impacts on campaigns that are self-funded. UBCM first raised this issue with the Ministry on October 12th. We think additional work is required in this area.

We believe the intent of our membership, with the endorsement of resolution A1 at the 2017 Convention, was to remove big money and outside influences from local government elections. Our membership did not raise concerns about candidates who self-finance their campaigns.

It is our understanding that many local government election candidates self-fund their campaigns, either through principle or out of necessity. We don't wish to stifle this approach. However, the proposed direction is not practical or realistic for those candidates who choose to self-fund. For instance, in order for some candidates to max out their expense limit with self-funding, it would necessitate

candidates placing funds in their election accounts by December 31st of each year, including the three years prior to the election. In fact, most candidates choose to run in the actual year of the election, sometimes even weeks or days before the nomination deadline. The current approach could actually have the unintended consequence of tilting the playing field towards incumbents over new candidates entering the election process.

While our membership supports the goal of removing big money and outside funding from our elections process we are concerned that the current legislation may be creating unnecessary complexity around the self-financing funding model especially for those smaller communities - recognizing that the median sized local government in BC is 5000 residents - and in some instances election spending in these smaller communities is minimal or very low. We believe the formula for self-financing should be simplified.

As we understand the current draft legislation, a self-financing candidate could spend more than they had been able to contribute in the year of the election on elections signage or some other election cost (e.g. \$1400 in expenses versus \$1200 in self-contribution) and be out of compliance; even though they are under their approved campaign expense limit. This appears to be an unintended consequence to UBCM.

We acknowledge that significant work and consultation went into the creation of expense limits for all candidates in BC and there was wide support for the final formulas. Is there value in linking the base levels for expense limits with self-financing? (i.e. \$5000 for council and electoral area candidates and \$10,000 for mayoralty campaigns). This is just one suggestion but certainly we are open to discussing other options for addressing this issue.

On behalf of our Executive we wish to reiterate our support for the work to date and appreciate the opportunity to continue to consult on this file.

Kind Regards,



Wendy Booth
UBCM President