



August 10, 2026

Mr. Ron Wiebe, MLA
Chair, Standing Committee on Alberta's Economic Future
AEFCommittee.Admin@assembly.ab.ca

Dear Mr. Wiebe,

On behalf of the Alberta Chambers of Commerce (ACC), representing 106 community chambers of commerce and more than 22,000 businesses, we appreciate the opportunity to provide input on the review of Alberta's *Lobbyists Act*.

The Alberta Chambers of Commerce supports the objectives of the *Lobbyists Act*, including transparency, accountability, and public confidence in government decision-making. At the same time, there is an opportunity to further align the Act with its stated purpose by recognizing the distinct role of grassroots, membership-based, not-for-profit organizations whose advocacy activities are undertaken on behalf of broad business communities rather than individual clients or commercial interests. As the Act seeks to promote transparency while preserving access to government, consideration of the unique characteristics of these organizations would help ensure a balanced and effective framework.

The Alberta Chambers of Commerce recommends the following changes:

1. Establish a simplified registration framework for membership-based, not-for-profit organizations.

A registration and reporting framework tailored to chambers of commerce, boards of trade, and similar organizations would more appropriately reflect their representative role and public policy mandate. Such a framework could focus on organizational registration, broad areas of advocacy, and designated organizational accountability, rather than requirements developed primarily for consultant lobbyists.

2. Reduce reporting frequency.

Organizations operating under a simplified framework could be required to provide annual confirmations and update their registration when material changes occur, such as changes in senior leadership, organizational structure, or advocacy mandate. This approach would maintain transparency while reducing unnecessary administrative burden and allowing resources to remain focused on serving members and contributing to public policy discussions.

3. Recognize existing public disclosures as a transparency mechanism.

Much of chamber advocacy is already publicly available through policy resolutions, policy papers, budget submissions, consultation responses, legislative committee submissions, and public correspondence.

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Where policy positions are publicly disclosed and attributable to the organization, additional reporting requirements would be most effective if they complement, rather than duplicate, information that is already accessible to the public.

4. Exclude internal policy development activities from lobbying threshold calculations.

Membership-based organizations devote significant time to researching issues, consulting members, developing policy positions, and preparing submissions before communicating with government. These internal activities are fundamentally distinct from lobbying activities and could be treated separately when determining whether registration requirements apply. Recognizing this distinction would better reflect how member-driven organizations develop evidence-based policy positions and engage in the public policy process.

These changes would preserve transparency while creating a more proportionate framework for organizations whose advocacy is member-driven, publicly disclosed, and only one component of a broader organizational mandate.

Sincerely,

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Shauna Feth
President & CEO

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