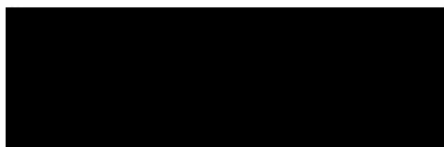
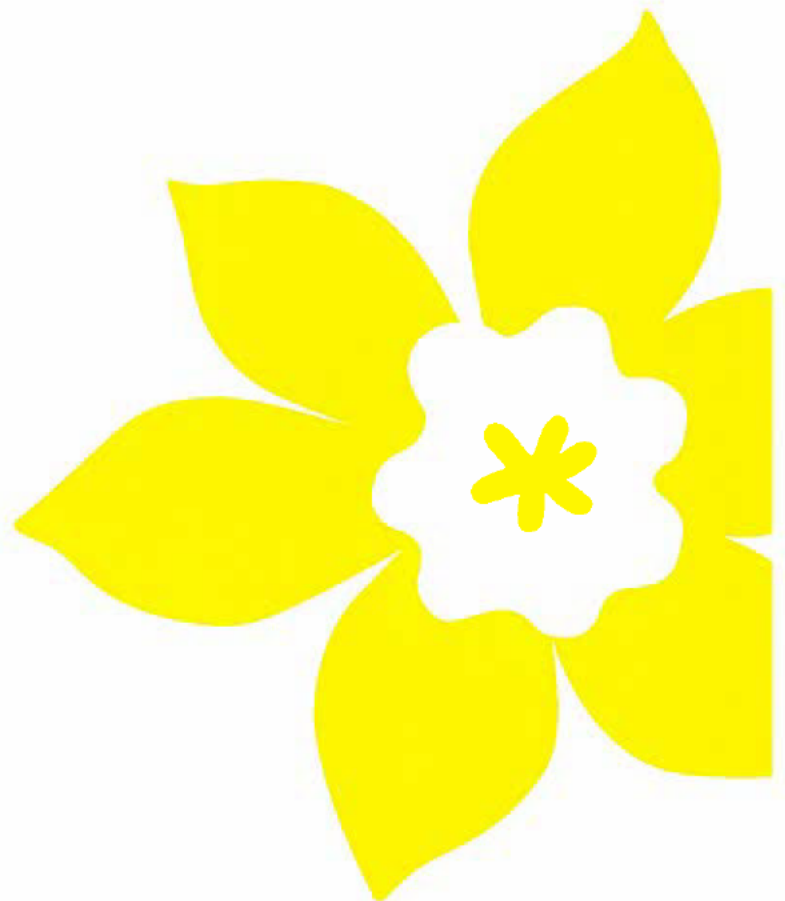




Canadian
Cancer
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Canadian Cancer Society Submission to the Standing Committee on Alberta's Economic Future: Alberta *Lobbyists Act* Legislative Review Recommendations

August 17, 2026



IT TAKES A SOCIETY

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Executive Summary

The Canadian Cancer Society (CCS) is a non-profit organization that works tirelessly to save lives, improve lives and drive collective action against cancer. Together with patients, volunteers, donors and communities across the country, we raise funds to invest in transformative cancer research, provide a caring support system for everyone affected by cancer and advocate to governments to create a healthier future for all. It takes a society to take on cancer – and the Canadian Cancer Society is leading the way.

CCS welcomes the opportunity to provide input into the legislative review of Alberta's *Lobbyists Act*. Advocacy is a core component of our mission, ensuring that the voices of patients, caregivers and communities as well as data and evidence are reflected in public policy decisions. CCS recognizes and supports the importance of a transparent lobbying framework and believes that transparent, ethical, and accountable public decision-making benefits both government and citizens. A modern lobbying framework should promote public confidence in government and support evidence-informed decision making while recognizing the important role that non-profit organizations play in informing public policy.

To ensure the effective participation of non-profit organizations in evidence-informed public policy decision making, CCS recommends the Alberta government:

- 1) **Maintain exemption for personnel of non-profit organizations.**
- 2) **Increase transparency regarding lobbying activities and government decision-making by establishing a public communication registry.**
- 3) **Improve public access to information about who is seeking to influence policy by improving the quality and specificity of registry disclosure requirements.**

Recommendations

Recommendation 1: Maintain Exemption for Personnel of Non-Profit Organizations

Requirements should recognize differences between commercial lobbying compared with advocacy undertaken by non-profit organizations acting in the public interest. CCS recognizes that transparency obligations should apply broadly; however, Alberta should ensure that compliance requirements remain proportionate for non-profit organizations. Public-interest advocacy differs from commercial lobbying in important ways, such as:

- non-profit organizations do not distribute profits to shareholders;
- advocacy by non-profit organizations is conducted to advance public benefit objectives;
- patients, caregivers, volunteers, and researchers frequently participate in advocacy efforts of non-profit organizations; and,
- non-profit organizations often operate with limited administrative resources.

We would like to highlight that changes to the *Lobbyists Act* that remove the exemption for personnel of non-profit organizations could disproportionately affect CCS, inadvertently reducing our capacity to serve the public.

While CCS supports strong disclosure requirements, removing the exemption for personnel of non-profit organizations could have unintended consequences for organizations whose advocacy activities are undertaken in the public interest rather than for private commercial gain. These unintended consequences include:



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- A significant increase in administrative burden wherein most non-profit organizations, including CCS, operate with limited staff and resources where advocacy activities are often conducted by employees whose primary responsibilities include policy analysis, program support, knowledge translation, and patient and community engagement. Without appropriate exemptions, non-profit organizations may be required to devote significant time and resources to managing compliance obligations that can divert resources away from mission-related activities such as supporting patients, funding research, or delivering community programs. Our experience in other jurisdictions, particularly British Columbia, illustrates these challenges. There, monthly reporting requirements, combined with detailed financial disclosure obligations, including reporting on funding requests across multiple jurisdictions, have required substantial time and resources to administer. This has reduced our organizational capacity to focus on direct support for those affected by cancer.

It is important to note that when the British Columbia *Lobbyist Transparency Act* legislation came into effect many non-profit organizations and other impacted groups raised serious concerns that the administrative burden of reporting, among other issues, could discourage legitimate public-interest advocacy and make it harder for government to hear from community organizations. As a result of these concerns, in May 2025, the British Columbia government amended¹ the legislation to reduce the burden of compliance for non-profit organizations.

- Curtailment of the evidence, data and expertise that non-profit organizations provide to government. For example, CCS provides the Alberta government with evidence and data on cancer prevention and care, patient and caregiver perspectives, health system expertise and research findings. If compliance requirements become overly complex or burdensome, a reduction in government engagement may occur, which could result in fewer voices participating in policy development for the public good.

Recommendation 2: Establish a Public Communication Registry

CCS supports the creation of a communication registry requiring disclosure of lobbying communications with designated public office holders. Currently, Alberta's registry provides limited information regarding actual lobbying activities. Unlike several other Canadian jurisdictions, Albertans generally cannot determine when meetings occurred, which public officials participated, or the specific nature of communication activities. This reform would meaningfully improve transparency in government decision-making. A communication registry should publicly disclose:

- Date of communication
- Name of lobbyist
- Organization represented
- Subject matter discussed
- Name and title of public office holder contacted

Recommendation 3: Improve the Quality and Specificity of Registry Disclosures

Registry entries should provide more meaningful information about lobbying objectives. Current subject matter descriptions can be broad or vague, limiting their usefulness to the public. Enhanced disclosure standards would improve understanding of the issues being advanced without creating excessive reporting obligations. Disclosures should include:

- Clear policy objectives
- Specific legislation, regulations, programs, or funding decisions being discussed
- Government institutions targeted
- Anticipated public policy outcomes



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Call to Action

CCS supports reforms that strengthen public confidence in evidence-informed government decision-making. The current review presents an important opportunity to enhance transparency while ensuring that non-profit organizations can continue contributing valuable expertise to policy discussions and support evidence-informed decision making.

We want to emphasize that our goal is aligned with the Government of Alberta's: to support transparency and accountability while ensuring that non-profit organizations can continue to effectively advocate for the health and wellbeing of all Albertans. The Alberta government should pursue a model that increases transparency while avoiding unnecessary administrative burdens that could discourage evidence-informed advocacy on behalf of patients, caregivers, and the public.

Thank you for your leadership on this important review and for considering the perspectives of the health non-profit sector.

1. British Columbia Ministry of Attorney General. *Changes to lobbying rules will make compliance more manageable*. Media release. April 23, 2025. Retrieved from: <https://news.gov.bc.ca/releases/2025AG0022-000359>