



August 17, 2026

Standing Committee on Alberta's Economic Future
c/o Committee Clerk
3rd Floor, 9820 – 107 Street NW
Edmonton, AB T5K 1E7
Via email: AEFCommittee.Admin@assembly.ab.ca

Dear Members of the Standing Committee on Alberta's Economic Future,

Re: Review of the *Lobbyists Act*

Thank you for the opportunity to provide written feedback to the Committee as part of your review of the *Lobbyists Act* (the Act). On behalf of the Alberta Chapter of the Public Affairs Association of Canada, we are pleased to submit the following comments for consideration.

Overview of the Public Affairs Association of Canada

The Public Affairs Association of Canada (PAAC) is a national, not-for-profit organization founded in 1984. Our principal objective is to help public affairs professionals succeed in their work by providing them with forums for professional development, the exchange of new ideas, and networking.

The Alberta Chapter's membership represents a cross-section of many disciplines involved in public affairs, including government relations, public relations, policy analysis, and public opinion research. Our members represent 40 organizations in the public, private, and non-profit sectors, working in areas such as energy, finance, small business, technology and innovation, municipal government, post-secondary, trade advocacy, and consulting. Our members serve as liaisons between their organizations or clients and government, providing advice and analysis to assist both groups in their interactions with each other.

We assist our members and lobbying regulators by hosting frequent educational workshops with the federal and provincial lobbying registrars, including Alberta's Lobbyist Registrar and the Office of the Ethics Commissioner, with whom we are proud to hold a strong working relationship. This helps to ensure that PAAC's members understand the legal and ethical requirements involved in lobbying public office holders, while providing lobbying regulators insights into the nature of the lobbying profession.

General Comments

We recognize that periodic review of the Act is mandated under law, but suggest the Act does not require significant updates or amendments at this time. The most recent changes to the Lobbyists Act and the Conflict of Interest Act are still recognized as sufficient by PAAC AB membership, and provide an appropriate level of transparency to conduct our work with integrity and trust.

We also acknowledge and appreciate the Committee's responsibility to act in the best interest of all Albertans. The practice of lobbying and public affairs plays an important role in shaping the issues that are most important to our communities, and its oversight should be conducted in a way that maximizes transparency and compliance while balancing the burden of execution.

In that spirit, we note that decisions or changes implemented in the Act may result in significant practical and financial implications for those impacted by it. To ensure open communication and trust is maintained between the Registrar, lobbyists, and the public, we strongly encourage the Committee to consider the effects of significant amendments to all affected stakeholders and the broader public.

Recommendation: Maintain existing lobbying disclosure exemptions for certain non-profit and municipal government representatives

PAAC Alberta supports the existing lobbying exemptions under section 3.11(i) of the Act for directors, officers, and employees of certain non-profit organizations not constituted to serve management, union or professional interests nor having a majority of members that are profit-seeking businesses. We similarly support maintaining existing exemptions for municipal governments and their staff when acting in their official capacities.

By maintaining these exemptions, provincial compliance resources can be most effectively deployed while limiting burdensome red tape for non-profits and municipalities.

Recommendation: Continue to provide municipalities with the flexibility to independently establish lobbyist registries, and to develop those systems in a manner that reflects local conditions and decision-making

PAAC Alberta wishes to emphasize the importance of respecting municipal autonomy by allowing local governments the flexibility to determine whether a lobbyist registration system is appropriate for their community. Where municipalities make the voluntary decision to implement a lobbying registry, they must have the ability to develop a system that addresses their unique concerns and requirements.

As such, PAAC Alberta recommends that the Act not be amended to include municipalities. By limiting the Act's applicability to provincial activities, Alberta can avoid implementing a one-size-fits-all approach that may not adequately achieve the outcomes intended by each municipality.

Should the Committee feel that municipalities wishing to implement a lobbying registry must do so under the provincial Act, PAAC Alberta suggests the development of a pilot program that is initially restricted to Calgary and/or Edmonton. A trial approach would ease practitioners, registrars, and administrators into the process and more clearly identify potential changes required in the Municipal Government Act before .

Recommendation: Adopt relevant learnings and avoid identified pitfalls from the federal Lobbying Act review

The Standing Committee on Access to Information, Privacy and Ethics (ETHI) is simultaneously conducting its statutory review of the federal Lobbying Act. Proposals brought forward by the Commissioner of Lobbying and some Members of Parliament are raising significant concerns for PAAC members across the country. If implemented, these amendments could create a substantial burden for non-profit organizations and small businesses across Canada, including in Alberta.

We need not be doomed to repeat the same mistakes, and suggest that important lessons can be learned from the federal review process to strengthen and improve our own Lobbyists Act. Key themes of concern include:

- **Uncertainty arising from ambiguous statutory language** - Disclosure requirements are viewed as unclear, leading to inconsistent interpretation and compliance risk.
- **Proportionality of reporting requirements** - Certain reporting obligations, such as monthly communication reports, present an administrative burden without commensurate transparency benefits.
- **Anticipated ‘chilling’ effect for smaller and non-profit organizations** - Additional reporting obligations may discourage smaller and non-profit organizations from engaging with government, make it more difficult to attract volunteer board directors, and dissuade important voices from contributing to public policy discussions.
- **Reliance on interpretive guidance rather than statute** - While guidance from the Office of the Commissioner of Lobbying is always valued, evolving interpretation, rather than legislative clarity, can create uncertainty for registrants.

Recommendation: Amend the designated filer system to allow for greater local accountability

Alberta currently utilizes a ‘designated filer’ system, where the most senior officer of an organization is the designated filer and must oversee every lobbying activity undertaken by any employee of the agency or organization. In the case of consultant lobbyists, the CEO of a firm or agency has an agency-wide registration, and all employees are registered under it.

Alberta is the only jurisdiction that takes this approach. The designed filer system presents challenges for organizations that lobby across jurisdictions in Canada, where the senior officer may not be directly involved in lobbying in a given province. Collecting information across

jurisdictions and accountabilities for compliance purposes can be onerous and introduce unintended noncompliances due to separation from the day to day work.

To mitigate potential errors and bring Alberta's legislation in line with other jurisdictions, PAAC recommends amending the designated filer system for consultant lobbyists so that each individual is accountable to the Registrar for their own activities. Alternatively, we suggest an amendment that introduces flexibility for national organizations to designate local senior officers as the designated filers for their Alberta lobbyist registrations.

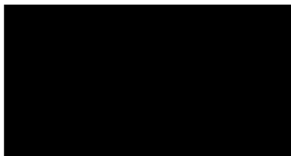
Recommendation: Additional consultation if significant reforms are recommended

We recognize the need to balance the demands and constraints of the legislative calendar in engaging stakeholders for reviews such as this. However, the overlap of this review's comment period with the summer months and Calgary Stampede activities may have limited the ability of some public affairs professionals to participate and provide input to the extent that might otherwise have occurred at a different time of year.

Should significant amendments come forward as a result of the Act review, we respectfully request additional consultation be conducted to ensure the changes are consistent in meeting the Act's stated objectives.

We thank you for your attention to these comments. PAAC Alberta is happy to discuss this submission, or the Act more broadly, at any time should you have questions or wish to clarify any of the suggested recommendations.

Sincerely,



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President, PAAC Alberta Chapter



Graham Sucha
Past-President, PAAC Alberta Chapter