



To the Standing Committee on Alberta's Economic Future,

Thank you for the opportunity to provide industry feedback during your comprehensive review of the *Lobbyist Act*.

I am making this submission on behalf of Gateway Public Affairs, an Alberta based public affairs professional services firm that is registered as a consultant lobbyist on the Alberta Lobbyist Registry for a number of private sector and non-profit clients.

While it's my belief that the *Lobbyist Act* functions well in comparison to other Canadian jurisdictions, I would offer the below three recommendations to reduce red tape for organizations, boost transparency for Albertans, and increase trust in the lobbyist profession.

1. Reducing Red Tape through Standardizing Financial Reporting:

Currently, the registry requires a list of government funding received and requested during the last 12 months. Many other jurisdictions require this information during an organization's most recently completed financial year, and Registrars' often cross-reference this with publicly available sources to ensure it is accurate.

By changing this language from "the last 12 months" to the "most recently completed fiscal year" this will reduce the administrative burden on organizations to simply provide their readily available last fiscal year information, rather than forcing them to conduct a standalone internal search, while still ensuring time-relevant funding details on the registry.

This will also ensure that information provided is accurate, as this is information is partially available through a variety of means depending on the legal structure of the organization (ie. CRA website for charities, public filings for publicly listed businesses).

Recommendation: Update "the last 12 months" to "the most recently completed fiscal year" to reduce the administrative burden on organizations and ensure accurate results are being provided to the Registrar.

2. Boosting Transparency for Albertans through a Functional Central Search Engine:

In its current form, the central search feature on the registry only allows for search results to draw upon the columns of organization, designated filer, government department lobbied, prescribed provincial entity lobbied, subject matter of lobbying, and lobbyists. The terms available in the subject matter of lobbying are largely restrictive to



Ministry names and generally not informative. As a result, the search feature on the registry website is largely ineffective for Albertans and organizations to navigate.

As lobbyists are already required to build upon the subject matter of lobbying in more detail in their filings, which are then published into what is currently a non-centrally searchable PDF, the central search feature should expand to search the complete filing in the PDFs to ensure this information is easily available to Albertans.

Recommendation: Broaden the registries search feature to include all information provided by a lobbyist in the Registries' search function.

3. Increase Trust in the Lobbyist Profession by Establishing a Code of Conduct for Consultant Lobbyists

Currently, Alberta's *Lobbyist Act* does not contain a designated Code of Conduct for third-party consultant registrants.

Code of Conducts and Professional Standards for third-party consultant lobbyists can be found in many other Westminster democracies, such as Western Australia (<https://www.wa.gov.au/government/publications/lobbyist-code-of-conduct>), and Queensland (https://www.integrity.qld.gov.au/data/assets/pdf_file/0007/2184019/Queensland-Registered-Lobbyists-Code-of-Conduct-Accessible-version-approved-24_05_2026.PDF).

A Code of Conduct also exists at the federal level in Canada (<https://lobbycanada.gc.ca/en/rules/the-lobbyists-code-of-conduct/lobbyists-code-of-conduct-2023>).

Clear standards established in a Code of Conduct would benefit reputable practitioners while weeding out bad actors in the space, providing organizations, who are often new to government relations, that have hired third-party consultant lobbyists the surety that their consultant is acting in their organization's best interests rather than the consultant's own financial interests.

This Code of Conduct should address third-party consultant lobbyists operating with conflicting or competing interests, real or perceived, to the detriment of the organizations they represent by ensuring that they are required to obtain informed consent from organizations on conflicting or competing interests rather than allowing bad actors to lobby on multiple sides of an issue without the knowledge of the organizations they are representing.

Western Australia's Lobbyist Code of Conduct states:



"Registered persons and accredited lobbyists shall not represent conflicting or competing interests without the informed consent of those whose interests are involved."

Queensland's Registered Lobbyists Code of Conduct states:

"Lobbyists must not represent conflicting or competing interests without the informed consent of those whose interests are involved."

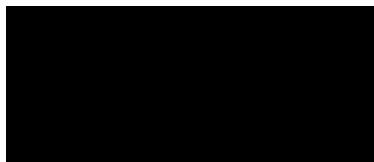
The Code of Conduct at the federal level in Canada also used to contain a similar clause on competing or conflicting interests before lapsing under the Liberal government in 2015.

By establishing a Code of Conduct for third-party consultant lobbyists and including a section on competing and conflicting interests, this would put the onus on third-party consultant lobbyists to act in good faith, rather than force organizations to do their own significant due diligence, many of which are new to government relations and are faced with a largely non-functional search engine on the registry.

Recommendation: Create a Code of Conduct for third-party consultant lobbyists to better ensure third-party consultant lobbyists are acting in good faith for organizations they represent and requiring them to secure informed consent.

Thank you for your consideration.

Sincerely,



Evan Legate
Principal, Gateway Public Affairs