



National Association
of Federal Retirees

Association nationale
des retraités fédéraux

Comprehensive Review of Alberta's Lobbyists Act

Submission to the Standing Committee on Alberta's Economic Future

Submitted by the National Association of Federal Retirees

August 17, 2026



Standing Committee on Alberta's Economic Future

c/o Committee Clerk
 3rd Floor, 9820 - 107 Street NW
 Edmonton, Alberta T5K 1E7
AEFCommittee.Admin@assembly.ab.ca

Dear Chair and Committee Members:

The National Association of Federal Retirees (Federal Retirees) welcomes the opportunity to contribute to the Standing Committee on Alberta's Economic Future's comprehensive review of the Lobbyists Act.

Federal Retirees is the largest national advocacy organization representing active and retired members of the federal public service, Canadian Armed Forces and Royal Canadian Mounted Police, retired federally appointed judges, as well as their partners and survivors. We represent approximately 170,000 members nationally, including close to 12,000 members in Alberta. Since 1963, the Association has advocated for the financial security, health and well-being of our members and older Canadians.

We support the fundamental objectives of Alberta's lobbying legislation. We also strongly support the complementary principle that lobbying is a legitimate democratic activity and that a system designed to regulate paid lobbying should not impede the ability of citizens, members, volunteers and organizations to communicate with public office holders. The Ministry of Justice emphasized both principles in its June 29, 2026 technical briefing to the Committee: lobbying is legitimate and communication with government is necessary in a democracy, while transparency requires the public to know who is engaged in paid efforts to influence government.

Our experience suggests, however, that the present framework does not always make the boundary between these principles sufficiently clear, particularly for member-based not-for-profit organizations that combine professional staff with substantial volunteer advocacy. The result can be uncertainty about who must register, why registration is required, whether an exemption applies, what activities count toward the 50-hour threshold and what the registration of an organization means for its unpaid volunteers.

Executive summary

Federal Retirees recommends that Alberta strengthen the registration rules to make them more predictable and easier to apply. In particular, the Association recommends that the Legislature:

- establish a clear statutory sequence for determining when an organization and its paid personnel are subject to registration;
- clarify the scope and effect of the existing non-profit exemption, including its application to member-based organizations serving individuals rather than commercial enterprises;
- retain and explain the volunteer exemption, including what counts as payment and how volunteer activity interacts with organizational obligations;
- distinguish clearly between an organization, its designated filer, individual organization lobbyists and exempt volunteers; and
- reinforce that registration is a transparency mechanism, not a barrier to democratic access to elected officials and other public office holders.

Federal Retirees' experience with the Act

Federal Retirees has been listed in the Alberta Lobbyist Registry since 2021. Our advocacy model involves both paid employees and unpaid volunteers. Employees undertake research, develop policy positions and advocacy materials, advise and support volunteers and, where appropriate, communicate directly with public office holders. Unpaid members and volunteers also meet with elected representatives and other public officials to discuss issues affecting retirees and older Canadians.

The Act expressly recognizes non-profit organizations and associations within the definition of an organization and defines an organization lobbyist by reference to paid employees, officers or directors

who lobby, or have a duty to lobby, individually or collectively, at least 50 hours annually. It also contains exemptions for certain non-profit organizations and for a person acting as an unpaid volunteer.

For an organization such as ours, these provisions can intersect in ways that are not intuitive. An organization may have paid employees who perform research and advocacy functions; unpaid volunteers who personally communicate with MLAs; staff who prepare materials for those volunteers; and employees who occasionally communicate directly with public office holders. The organization may also appear, on its face, to fall within the non-profit exemption. Determining the legal result should be straightforward. In practice, it has not always been so.

In March 2025, the Association sought clarification from the Office of the Ethics Commissioner concerning the application of the Act to volunteer activity, paid staff support and the non-profit exemption. Based on the information presented, the Registrar advised that unpaid volunteer lobbying does not require registration; that paid staff who simply support volunteers and do not communicate with Alberta public office holders do not require registration on that basis; and that the Association appeared to fall within the non-profit exemption.

After further discussion and additional context concerning the Association's activities, the Association understood from the Registrar's office that application of the exemption was a grey area and that deregistration was not recommended. We raise this experience not to ask the Committee to determine Federal Retirees' registration status. Rather, it illustrates the policy problem: a sophisticated national not-for-profit organization acting in good faith should be able to determine with reasonable certainty whether the Act requires registration and which people and activities fall within the regime.

Recommendation 1: Create a clear statutory requirement for when registration is necessary

The Act and accompanying authoritative guidance should allow an organization to work through a straightforward sequence of questions. The sequence should be reflected in the legislation or regulation, not left solely to informal interpretation.

It would make the Legislature's intended scope more understandable. The current regime requires several definitions, thresholds and exemptions to be read together before an organization can determine whether registration is required.

Recommendation 2: Clarify the scope and legal effect of the non-profit exemption

The existing exemption distinguishes certain non-profit organizations from organizations constituted to serve management, union or professional interests or whose membership consists primarily of profit-seeking enterprises or their representatives.

Federal Retirees recommends that the Act or regulation define, with examples, what it means for an organization to be "constituted to serve" management, union or professional interests and how the majority-membership test is to be applied. Guidance should expressly address organizations composed primarily of individual citizens, retirees, patients, consumers, veterans or other individuals rather than businesses or professional practices.

Most importantly, the legislation should state plainly what follows once the exemption applies. Does it mean that the employees, directors and officers described in the exemption are outside the registration requirements for activities undertaken in their official capacity? Does the organization or its designated filer have any residual filing obligation? Does the exemption apply regardless of the amount of staff time devoted to otherwise registrable activity? Those consequences should be explicit.

Not-for-profit status alone should neither automatically require registration nor automatically establish an exemption. The statutory test should determine the result, and an organization that satisfies the test should be able to identify that outcome confidently without obtaining repeated legal advice.

Recommendation 3: Retain and explain the volunteer exemption

Federal Retirees strongly supports retaining the exemption for unpaid volunteers. The distinction between paid lobbying and unpaid citizen participation is important to the democratic purpose of the Act. The Registrar has confirmed to the Association that lobbying undertaken by unpaid volunteers does not require registration.

The Act and public guidance should go further and explain the policy and practical consequences of that exemption. In particular, guidance should confirm that an unpaid volunteer does not become an organization lobbyist merely because:

- the organization the volunteer represents is registered;
- the volunteer advances an approved organizational policy position;
- the volunteer uses research, briefing materials or speaking points prepared by paid staff;
- paid staff have arranged or helped prepare for the volunteer's meeting; or
- the volunteer is an elected or appointed officer of a branch or local component but receives no payment for performing the relevant functions.

The legislation or regulation should also define what counts as "payment" for purposes of the volunteer exemption. Reimbursement of reasonable travel and out-of-pocket expenses should not transform a volunteer into a paid lobbyist. The treatment of per diems, honoraria and other nominal payments should also be made explicit. Organizations should not have to infer these distinctions from general wording.

Recommendation 4: Distinguish the organization, designated filer, paid lobbyists and exempt volunteers

The terminology of lobbyist registries can itself create misunderstanding. When an organization appears in a registry, members and volunteers may reasonably but incorrectly conclude that everyone speaking on behalf of that organization is thereby a "registered lobbyist." Conversely, the listing of named employees can be misunderstood as an optional organizational designation rather than a legal disclosure requirement.

The Registry and public guidance should explain in plain language:

- why an organization has a return;
- the role and legal responsibility of the designated filer;
- why particular paid employees, officers or directors are identified;
- that the listing of an organization does not automatically make all of its members, branches or volunteers lobbyists; and
- that an exempt volunteer remains exempt even when acting in support of the same policy position being advanced by registered staff, subject to the actual wording of the Act.

This information should be visible at the point of registration and on the public Registry itself. The goal should be a Registry that not only discloses information but also accurately communicates what that information means.

Recommendation 5: Reinforce that registration does not restrict democratic access

Federal Retirees has encountered concern among volunteers that an organization's presence in a lobbyist registry could make elected representatives less willing to meet with unpaid members or could imply that only registered individuals should communicate with government. Our review did not establish that Alberta public office holders were refusing meetings because of the Association's registration, but the concern itself demonstrates the potential for misunderstanding.

The Act, Registry website and guidance for public office holders should state clearly that registration does not confer privileged access and, equally, that registered status does not create a legal barrier to legitimate communication by exempt volunteers, constituents or members of the public. This would reinforce the principle articulated during the Committee's technical briefing: the legislation is not intended

to constrain communication with public officials; communication with government is necessary in a democracy.

Conclusion

Organizations that employ professional staff should understand when paid advocacy crosses the statutory threshold for lobbying. Organizations that qualify for an exemption should be able to determine that confidently. Individuals whose positions must be disclosed should understand why. Volunteers should know that their legitimate unpaid participation in public policy remains protected. Public office holders should understand that registration is a disclosure mechanism, not a reason to restrict legitimate engagement. Our experience demonstrates that these questions are not always readily answered under the present framework.

We therefore encourage the Committee to recommend amendments and accompanying authoritative guidance that make the Act easier to understand and comply with while preserving its central purposes: transparency, accountability, public confidence and free and open democratic participation.

Thank you for the opportunity to provide the Association's experience and recommendations as part of this review. Federal Retirees would be pleased to provide further information or appear before the Committee should that assist its work.

Sincerely,

Anthony Pizzino

Chief Executive Officer

