



Highway 3 Twinning Development Association

Lobbyists Act Review Comments

While we recognize our Association is atypical, we are aware of other similarly structured Not-for-profit Associations (i.e., Regional Economic Development groups) who may struggle with portions of the Act. As such, perhaps the Act can be revised in a manner that can be easily understood for all. Below reflects the considerations from my perspective, as the Organization Lobbyist.

5(1)b: (request to review filing return requirement timing or on-line form submission)

For those of us who will not be changing the methods or mission for lobbying for a considerable duration, completing the return form every 6 months is not efficient. Suggest one of the below solutions:

- a. Require filing a return ONLY when there has been a change to the prior filing.
- b. Instead of certifying each pre-filled page of the return form every 6 months, page 1 of the return form has a box to check to certify there are no changes... which will then resubmit the entire document as previously completed (instead of going through each page).
- c. Revise/extend the return filing date to annually or every two/three/four/five years.

1(1) b: (definition clarity suggested)

It is clear our Association's Mission, as Corporation formed under the Societies Act, is to Lobby the Province of Alberta for a desired outcome. I am contracted (not an employee) part-time by the Association to provide Administration of the actions requested by the Board and Officers of the Association. A portion of these activities includes direct and indirect Lobbying to the GOA, with a similar portion of Operational administration unrelated to lobbyist activities. In this manner, I believe my identification is as an "Organization Lobbyist" 1(1)h. However, 1(1)b had me questioning, and as such perhaps additional definition clarification of 1(1)b would assist others.

3(1) i (additional clarity suggested)

This Act does not apply to any of the following when acting in their official capacity:

i directors, officers or employees of an organization referred to in section 1(1)(g)(iv) not constituted to serve management, union or professional interests nor having a majority of members that are profit-seeking enterprises or representatives of profit-seeking enterprises; adding: 1(1)(g)(iv) "organization" includes a non-profit organization, association, society, coalition, or interest group

We struggle with the meanings of "management" and "members". Our Association is made up of a large majority of Municipal (City/Town) *members* and of these members, a member designated representative (Councillor/Mayor/Reeve) are our Board and Officers who are tasked with *management* of the Association. We have questioned if the Act will apply to our Members/Board when they lobby 1(1) h (ii), or myself (do I/we need to register at all). We have registered, better safe than sorry – but again perhaps the Act can be written in a manner that is more easily understood.

Schedule 2: (additional clarity suggested)

2(d) Noting the Association membership described above, the name and address of each Municipality that is paying a *MEMBERSHIP FEE* over \$1000 to the Association must be provided. If the payment is a membership fee, does this clause reflect the intent of the section? Should a Municipality need an address provided?

2(l) & (l.1) We interpret a Municipality to be a "Government Agency" as this term is not defined under 1(1) Interpretation. Every Municipal member 'funds' the Association through membership fees, which are invoiced annually (request for funding); two sections to fill out with all of our Southern Alberta Municipal member information. Again, what is the intent?

Thank you for your time to consider these comments as you review the Lobbyist Act.