

**From:** [Lisa Kowalchuk](#)  
**To:** [AEFCommittee.Admin](#)  
**Subject:** Response to Invitation for Written Submissions - Comprehensive Review of the Lobbyist Act  
**Date:** Wednesday, November 24, 2021 11:45:19 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Lobbyist Act Review Stakeholder Letter 2021.pdf](#)

---

November 24, 2021

Standing Committee on Alberta's Economic Future  
c/o Committee Clerk, 3rd Floor, 9820 - 107 Street  
Edmonton, Alberta, T5K 1E7  
[AEFCommittee.Admin@assembly.ab.ca](mailto:AEFCommittee.Admin@assembly.ab.ca)

To the Standing Committee on Alberta's Economic Future:

Re: Comprehensive Review of the Lobbyist Act

Thank you for your letter dated October 22, 2021, and the opportunity to respond regarding the comprehensive review of the Lobbyist Act.

We appreciate the online portal through the Alberta Lobbyist registry services, which makes the process of registering and filing easier to administer. We also appreciate that fees are waived for online registry submissions.

Still, the process itself can be time-consuming with some potential improvements that could be made to increase compliance while reducing the burden, including:

- 1. Increase the minimum number of hours of lobbying activities from 50 hours annually to 100 hours annually or create rules for exemptions.** Due to the administrative burden of filing, it may be cumbersome for small organizations to submit semi-annual filings, particularly if they are only lobbying on a single issue, cause or purpose. Over a year, the accumulation of 50 hours on one subject would not take long to accrue with correspondence, phone calls, and meetings. Many may not even realize that they are subject to the lobbyist act if they are unaware of the time required, as it is so minimal, and they may not be tracking the time spent. Small organizations may not recognize that their activity would be considered lobbying or may not even realize how quickly their time could potentially add up on a single issue. We acknowledge that BC and Saskatchewan had also reduced the 100 annual hours threshold and that Ontario also has the lower threshold as well. However, Manitoba still maintains the 100 hours, and other jurisdictions also have exceptions. Alberta may wish to consider similar exceptions where organizations with a charitable mandate or a not-for-profit with less than five employees who lobby a total of fewer than 100 hours annually would be exempt.
- 2. Remove the requirement to file a return within 30 days after a change occurs.** Filing amendments or changes can be particularly cumbersome in the circumstance

of both funding applications and ongoing lobby activity. During Covid, the administrative burden of submitting a change became increasingly apparent each time an application was made for funding, mainly related to pandemic funding such as the Canada Emergency Wage Subsidy and student grant funding. In a typical year, there may not be as many funding requests; however, in circumstances that we have recently experienced, this made the lobbying registry much more time-consuming. In addition, there shouldn't be a requirement to submit a change unless that change is of significant merit, such as a change in staffing. A lobbyist organization may be involved in several different issues. When engaged in a new issue, an organization may not even realize that issue is considered a lobbying activity, particularly if it's a single letter on a subject matter or a response to a request for consultation. The request for feedback on the Lobbyist Act would be an example of that question or doubt. If the Government is requesting input or information on a particular piece of legislation or regulation, a lobbyist organization may not be aware of whether or not it would be subject to a change submission under the lobbyist act. Similarly, if the Government is requesting a meeting, roundtable or event, there would be a question on whether that would constitute a requirement to submit a change on the lobbyist registry. Submissions of changes can create an overly administrative process. With semi-annual filings required, some of these elements can be managed with each of those formal filings. Changes to staffing or registered lobbyists would still be warranted to be changed within 30 days of the change taking place, as it changes the individuals who are participating in those activities and provides a verification tool for those being lobbied.

3. **Provide further clarity to the items that qualify as a lobbyist activity.** As mentioned in the point above, some activities are clearly lobbying activities. This is often demonstrated when an organization, entity or individual takes a stand or position on a particular topic and undertakes activities to see those changes or recommendations made. It becomes less clear when a request is from the Government for feedback, for an event or for consultation on a subject matter and whether they would be classified as a lobbying activity, as it may not be the priority or position of the organization. However, at the request of the Government, they may participate in that dialogue, discussion or opportunity to provide insight or feedback. Ontario has clarified these types of conditions through its guide to the Lobbyist Registration Act document. They state that *'the 50-hour threshold does not include communications with public office holders that do not trigger a requirement to register under the LRA such as making submissions to a committee of the Legislative Assembly that are a matter of public record, responding directly to written requests for advice or comment from public office holders or seeking information or clarification about the enforcement, interpretation or application of an Act or regulation or, the implementation or administration of any government policy, program, directive or guideline'*. Further clarity on these matters would assist organizations in knowing what constitutes lobbying activity under the lobbyist act and what is not considered.

Thank you again for providing us with the opportunity to provide additional perspectives and recommendations.

Sincerely,

Lisa Kowalchuk

**Chamber**  
of **COMMERCE**  
MEDICINE HAT & DISTRICT

**Lisa Kowalchuk**  
*Executive Director*

413 6th Avenue SE  
Medicine Hat, AB  
T1A 2S7

*Fuelling Our Business Community* [medicinehatchamber.com](http://medicinehatchamber.com)

Connect with us:

