



Michelle Alexander
Vice President

Jack Rando
Managing Director

VIA EMAIL

AEFCommittee.Admin@assembly.ab.ca

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Re: Comprehensive Review of Alberta's *Lobbyists Act*

The Investment Industry Association of Canada (the "IIAC") appreciates the opportunity to provide input to the Standing Committee on Alberta's Economic Future regarding the province's *Lobbyists Act*.

Summary: The IIAC encourages a unified and consistent lobbyist framework in Canada including a centralized registry platform which provides the public with easier access to a holistic picture of a lobbyist's activities.

The Investment Industry Association of Canada (IIAC) is the leading national association representing 117 investment dealers who comprise the vast majority of the financial services provided to Canadian retail and institutional investors.

Our members distribute a variety of securities such as mutual funds and other managed equity and fixed income funds and provide a diverse array of portfolio management, advisory and non-advisory services. Several of our members also have MFDA regulated mutual fund dealers.

Our members trade in debt and equity on all Canadian marketplaces, provide carrying broker services and underwrite issuers in public and private markets. They operate in Canadian and global capital markets.

The IIAC has been a registered organization lobbyist with Alberta since 2006. We support a registration system of lobbyists that values the importance of free and open access to the government and public transparency of lobbying activities.

While the IIAC provides some comments below on the specific provisions set out in the *Lobbyists Act*, our primary concern relates to a unified and consistent lobbyist framework in Canada generally.

Each jurisdiction, including Alberta and the federal government, have their own specific lobbyist framework. This leads to unnecessary challenges for national organizations to keep track of changes and differences in the legislation and ensure adequate adherence and compliance. For example, while Alberta and Ontario both adopt a 50-hour annual threshold in their definitions for organizational or “in-house” lobbyists, for the purposes of determining this threshold, Alberta **includes** time spent preparing for communications while Ontario **excludes** time preparing for communications.¹ The need for such differences is unclear.

In addition, many key terms are consistently found within various lobbyist legislation but their definitions can slightly differ. We encourage the Standing Committee to review the following defined terms contained in the *Lobbyists Act* to ensure they remain relevant and aligned with that of other Canadian jurisdictions:

- *designated filer*
- *public office holder*
- *former public office holder*
- *grassroots communication*
- *lobby*

Though perhaps outside the scope of your current review, we would also like to share with you an additional observation relating to the online portals that registered lobbyists are required to use in fulfilling their reporting obligations to ethics commissioners across the country as prescribed by provincial legislation. While we find Alberta’s Registry system to be among the best designed and easiest to use, these systems are very much varied across the country which adds yet a further complication to lobbyists operating across multiple jurisdictions who need to familiarize themselves with each of these technical systems. These systems also represent a significant amount of duplication on the part of filers. Static information such as organizations name, address, description, and senior designated officer name needs to be reported repeatedly in numerous systems. A central registry system, properly designed to respect the lobbyist requirements of each jurisdiction, could alleviate these issues. Importantly, a central registry could also provide the public with improved transparency as it would eliminate their need to access multiple registries to develop a holistic picture of what activities a lobbyist is engaged in.

¹ See section 3.1 of Alberta’s *Lobbyists Act* and [Ontario’s Guide](#) to their Lobbyist Registration Act (page 12).

In closing, we encourage Alberta to coordinate with its counterparts in other jurisdictions to promote increased harmonization when revising the current framework.

Yours sincerely,

"Michelle Alexander"

"Jack Rando"