

## Recommendations for Lobbyist Act Review

Thank you for the opportunity to provide feedback on the current lobbyists registry processes and system capabilities. As per your request, we have collected feedback from our staff and clients and would like to suggest the following changes:

### Definition of government and funding disclosures

We believe that the focus in the act should only be on the provincial level rather than municipal, federal or international when it comes to disclosing funding received and requested. Disclosing this level of detail seems unnecessary given that this registry is only intended to disclose lobbying that takes place on the provincial level. Although the additional financial disclosure may at times be relevant, the additional red tape that created does not seem appropriate. We would also recommend that stakeholders should be allowed to have extra time to disclose funding that has been applied for. Particularly for smaller organizations, the current timeframe adds undue stress and red tape.

### Initial registration timeline

We would recommend extra time and a clearer definition for what constitutes a 'meeting on of the minds'. In our experience, there can at times be a verbal agreement to work together without necessarily getting a formal contractual agreement signed with that party. This can leave an organization like Alberta Counsel in the awkward position of having to register a stakeholder on the registrar that is not actually a client yet. Our suggestion would make the starting point ten days after a contractual agreement is signed. This would make it clear and easy to determine what a deadline for initial registration is.

### Additional flexibility for non profit and Indigenous stakeholders

While we support the overall restriction on working on contingency fee agreements and, in fact, that formed part our submission on the last review, we would recommend changing the rule slightly to allow for additional flexibility for non-profit and Indigenous clients. We believe that non-profits and Indigenous groups ought to be able to structure their affairs how they wish as they may not have the upfront funds to retain a lobbyist. Therefore, our recommendation is to eliminate prohibition of contingency fee agreements for these groups.

If you have any questions or would like to receive additional clarification on any of these recommendations, please do not hesitate to reach out.

Kind regards,



Pascal Ryffel  
Director of Government Relations