

September 7, 2016

Mr. Rod Loyola
Chair
Standing Committee on Resource Stewardship
c/o Committee Clerk
3rd Floor, 9820 - 107 Street
Edmonton, Alberta, T5K 1E7

Dear Mr. Loyola:

Re: Comprehensive Review of the *Lobbyists Act*

Thank you for the opportunity to participate in the review process for the *Lobbyists Act*. As the voice of Alberta's forest sector and a registered Organization Lobbyist, the Alberta Forest Products Association aims to build strong relationships with government and work towards the good of Albertans.

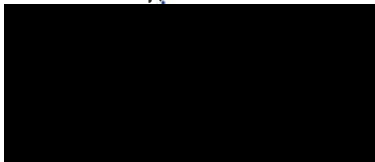
We have a number of recommendations to share with regard to the functioning of the *Act* and associated administrative procedures:

- 1) **Maintain the Distinction Between Organization and Consultant Lobbyists –** Organization and Consultant lobbyists are fundamentally different in terms of work, clients, and techniques. Maintaining a distinction between the two is appropriate.
- 2) **Modify the Forward Looking Provision contained in Schedule 2 (m) (2) –** The requirement to identify in the return specific lobbying activities that will take place within the next six months is difficult to satisfy, given that the specifics of legislation and policies that may arise are unknown. Moreover, as an Organizational Lobbyist, we are already required to identify the general purpose of the organization (i.e. to promote the sustainability of Alberta's forest sector), which in itself articulates general lobbying goals. Identifying broad goals (i.e. economic diversity, forest health, etc.) should be sufficient.

- 3) **Clarify the Need to Identify Specific Legislation and Regulations** – The need to identify specific legislation and regulations should be clarified for lobbyists. Is it, for example, sufficient to state that we are lobbying on “the *Forests Act* and associated regulations”? Or must we identify each regulation and section of the act? Any effort to increase the amount of specificity required should be approached with caution. Discussion on broad topics like economic diversification may touch on any number of regulations. Identifying each and every one of them may require a knowledge of many different acts and regulations that few have. Identifying the general purpose of the lobbying should be sufficient.
- 4) **Enhance the Information Technology System to Promote Efficiency** – We have had an experience where information saved in the Lobbyist Registrar system (at the pre-submission stage), was inexplicably lost. We were forced to re-enter the work. Enhancing the system to ensure that this does not happen is essential.
- 5) **Maintain Section 5 (2)** – The requirement to only file one return, even if multiple stakeholders are approached, is logical. As an Organization Lobbyist, our goal is quite clear: to promote the long-term sustainability of our sector. We strive to maintain good relationships and clear lines of communication with both elected and departmental officials. This means using opportunities like chance meetings in the community and at events to inform them about the state of forestry in Alberta. Requiring each of these encounters to be documented is needlessly onerous and should not be contemplated.
- 6) **Streamline Submission Processes** – The current submission process requires the organization’s contact to submit a filing. In our case, this is the responsibility of our Director of Communications. Once this is complete, the system then sends an e-mail to our designated filer, the President and CEO, for final submission. This process is needlessly duplicative. One submission from the organization should be sufficient.

Thank you for the opportunity to comment on this important legislation. Should you have any questions, I can be reached directly at 780.452.2841.

Sincerely,



Paul Whittaker
President and CEO