

September 23, 2016

Standing Committee on Resource Stewardship  
c/o Committee Clerk  
3<sup>rd</sup> Floor, 9820-107 Street  
Edmonton, AB T5K 1E7

## **Review of the Alberta *Lobbyists Act* – Hill+Knowlton Submission**

Hill+Knowlton Strategies (H+K) welcomes the Standing Committee on Resource Stewardship's review of the *Lobbyists Act* and the opportunity to provide our input. This initiative affords the committee and the broader public an important opportunity to review the *Lobbyists Act*, to consider improvements to its effectiveness and to provide clarity and consistency in its application.

H+K believes lobbying is a fundamental right, produces more informed public policy decisions and is ultimately in the public interest for citizens and for government. The practice of lobbying provides a forum for the resolution of competing and often different points of view; improves the quantity and quality of information and analysis in policy making and allows for a range of viewpoints to be shared directly with decision makers. In essence, lobbying is the bridge between business, NGO's and government.

We have drawn on many years of experience in Alberta to inform our recommendations to improve the *Lobbyists Act*. In addition, we have carefully considered our experiences with the federal *Lobbying Act* and with other provincial acts and registries including those in BC, Saskatchewan, Ontario and Quebec. We take our obligations under these Acts seriously and hope our suggestions will help to further improve Alberta's lobbying legislation.

H+K makes the following recommendations to the committee:

### **1. Ensure Transparency for Business & Government**

Currently, the Alberta system allows some lobbyists to avoid the registry entirely – therefore impacting the transparency that the *Lobbyists Act* was set out to address.

A broad array of organizations which represent business are technically exempt from the *Lobbyists Act* because they are narrowly defined as “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.”

In our view, this exclusion is not in the interests of business, government or the public. Removing the exemption - or enforcing a broader, more practical definition of the rules as written – will strengthen transparency and credibility for business and government. Eliminating exemptions of this kind would also reduce disputes about application of the legislation and allow the Office of the Ethics Commissioner to focus on compliance.

The *Lobbyists Act* should be applied equally to all business interests lobbying government. Equality and transparency must be the prevailing theme of the Act.

## **2. Ensure Legislation is not an Administrative Burden**

H+K believes the information and reporting requirements for consultant and organization lobbyists is sufficient to provide a robust and transparent registry of lobbying activities. We recommend that no further disclosure requirements be put in place.

We emphasize to the committee that too large an administrative burden will create a prohibitive barrier to participation for charities, not-for-profits, small businesses and individuals. For example, the monthly reporting requirement of the federal registry has become a significant burden for some organizations who bring important voices and perspectives to Canadian public policy development.

H+K recommends to the committee that all registrations be treated with consistency in terms of the information which is required to be submitted. First time registrations and renewal registrations should provide the same information. In viewing a range of current registrations, we note inconsistencies in the details provided about the organization and its lobbying activities

It is worth noting that H+K – like others – has experienced challenges working with the online system itself, but we understand a new program / interface / process will improve usability of the registry in November 2016.

## **3. Do Not Limit the Rights of Albertans to Engage in Volunteer Political Activity**

In Canada and many other jurisdictions, legislation is deliberately silent on the voluntary political activities of registered lobbyists. Codes of conduct guide such activities in those jurisdictions.

In order to respect the democratic rights of all Albertans, H+K recommends the committee not impose legislative limits on the right of registered lobbyists to participate in political activities. The democratic rights of registered lobbyists are no different than those of public service employees and all Albertans. As a matter of principle the right of all Albertans to participate in the democratic political process should not be impeded by the Act.

## **4. Ensure Consistency in Interpretation**

The review of the *Lobbyists Act* is an important opportunity for improvement of the legislation and its efficacy for Albertans. H+K recommends a renewed focus on ensuring the legislation is understood, consistently applied and consistently interpreted. This includes addressing fundamental questions of “what is lobbying,” “what activities are considered lobbying,” and “who is a lobbyist” which we have observed are understood and applied in a patchwork fashion both by government and by those engaging in dialogue with government.

H+K recommends the commission provide clear guidance and interpretation to accompany new / amended rules to ensure all standards and requirements are consistently understood, followed and applied to deliver transparency and equality for all Albertans.

## **Who is Hill+Knowlton Strategies Canada?**

Founded in 1927, Hill+Knowlton Strategies has operated in Canada for 30 years. Hill+ Knowlton Strategies Canada is part of an international network of 85 offices located in 46 countries.

H+K provide clients with services ranging from public affairs, government relations, corporate and crisis communication, marketing and public relations, digital media and strategic counsel service. Our consultants are qualified in a variety of policy fields, business, marketing and media relations with many having extensive government experience.

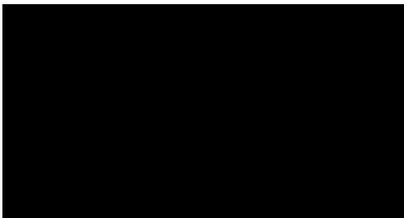
With over 220 professional staff and numerous associates across Canada our network includes offices in Quebec, Montreal, Ottawa, Toronto, Regina, Edmonton, Calgary, Vancouver and Victoria.

## **Conclusion**

We are grateful for the opportunity to provide our observations and recommendations to the Standing Committee on Resource Stewardship as it reviews the *Lobbyists Act*.

If helpful, we would be pleased to appear before the committee to discuss our experiences and recommendations.

Yours sincerely,



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Hill+Knowlton Strategies  
Canada