



October 17, 2016

Standing Committee on Resource Stewardship
Aaron Roth
Committee Clerk
3rd Floor, 9820 – 107 Street NW
Edmonton, AB T5K 1E7

Comments and Feedback Pertaining to the Review of the *Lobbyists Act*

Thank-you for the opportunity to provide comments on the *Lobbyists Act* as part of the review by the Standing Committee on Resource Stewardship.

Global Public Affairs is a privately-held Canadian firm providing integrated government relations, strategic communications and issues management consulting services that enable clients to successfully navigate increasingly complex public policy and business environments.

Headquartered in Ottawa, Global has a national footprint with practices in Toronto and Vancouver, and a well-established Alberta practice with offices in Calgary and Edmonton. We are a registered consultant lobbyist in Alberta, currently with 26 active registrations assisting clients in the healthcare, energy, transportation, culture and non-profit sectors, among others.

Global helps Canadian and international organizations address issues, manage risk, enhance their reputations, and find common ground with stakeholders. Members of Global's team have served on the executive of some of Canada's largest corporations, held leadership positions at a number of the country's most reputable consultancies, and worked in senior provincial and federal government posts.

As a national organization, Global has experience working under and complying with lobbyist legislation across the country, and we are fully committed as an organization to ensuring we are compliant with both the letter and spirit of these laws. We draw upon that experience in providing these comments.

Lobbying is a legitimate activity

In considering changes to the *Lobbyists Act*, Global would encourage the committee to return to the current act's preamble, which substantively mirrors the preamble for lobbyist legislation across the country.

The preamble to the *Lobbyists Act* states:

*WHEREAS free and open access to government is an important matter of public interest; and
WHEREAS lobbying public office holders is a legitimate activity; and
WHEREAS it is desirable that the public and public office holders be able to know who is engaged in lobbying activities; and
WHEREAS a system for the registration of paid lobbyists should not impede free and open access to government;*

Global respectfully submits that any amendments to the act through this review must be grounded in the spirit of the existing preamble.

Critically, the preamble recognizes that lobbying is a critical and legitimate part of the public policy process. Government officials, business executives, and charitable organizations all have their own means of discussing public policy issues based on their perspectives, priorities and experience.

Professional lobbyists help understand and bridge these differences to add value to the public policy process through improved understanding and communication between stakeholders.

Lobbyists also perform an important service in assisting those unfamiliar with government in navigating a dynamic and constantly framework of government rules, regulations and processes.

We also provide value to government by providing insight into sector needs and perspectives.

Consultant lobbyists also work with investors and businesses based outside Alberta as a means to introduce them to the political processes of the province, the issues and opportunities in a particular sector, as well as provide on the ground support when companies do not yet have an office or staff in the province. Such support is a cost effective introduction to doing business in Alberta, is common throughout the world and particularly important to Alberta at this time as it seeks to attract new investment and businesses into the province.

Ultimately, Global believes that any changes to the *Lobbyists Act* must reflect that lobbying is a legitimate and indeed desirable activity within the democratic process as a result of seeking public participation and input into government processes and decision-making.

Further to this general comment, Global is of the view that the *Lobbyists Act* serves well in its primary purpose of providing transparency in the interactions between government and those undertaking lobbying. It is also our view as consultant lobbyists that the current registration requirements do not pose an undo impediment to accessing government, an important principle of maintaining a robust public policy dialogue.

To the extent that refinement is needed on registration requirements, it is our view that these changes can be handled through guidance within the current legislative framework, as has been the case in the past, for example when the Lobbyist Registrar has sought greater clarification of lobbying matter subject areas.

Prohibition on contracting with Prescribed Provincial Entities (PPEs)

Under the amendments made to the *Lobbyists Act* when the *Alberta Accountability Act* was passed in 2014, consultant lobbyists are no longer able to contract with government or Prescribed Provincial Entities (PPEs) if they are also registered to lobby (previously the prohibition had been applied more narrowly to the scope of the contract and lobbying subject matter). Effectively they must choose to either lobby or work for government.

Global recognizes this change helps remove any ambiguity or the appearance of a conflict of interest between consultant lobbyists and government organizations. However, an unintended consequence of this change has been to limit the ability of a PPE to enter into contract with a consultant lobbyist regardless of the geographic scope or issue. To clarify, a PPE is currently prohibited from engaging a national firm like Global to undertake lobbying activities federally (or in any other jurisdiction).

Amendments to the *Lobbyists Act* to reflect this geographic distinction and to permit work that does not in any way engage with the Alberta government would increase the flexibility of PPEs to engage expertise to assist them in their work.

Conclusion

Thank-you again for the opportunity to provide these comments. While it is our view that the current *Lobbyists Act* framework is sufficient to meet the intent of the legislation, we would welcome the opportunity to engage and provide further comments should changes be contemplated. Global has a wealth of experience in working under lobbying acts across the country which we believe would add value to the committee's deliberation.

Sincerely,



Kristin Anderson
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