



320, 5th Avenue SE, Calgary, AB T2G 0E5
ywcacalgary.ca

February 15, 2017

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

Dear Mr. Loyola,

RE: Lobbyists Act Review

As a member of the Calgary Chamber of Voluntary Organizations (CCVO), we received their response to the Standing Committee on Resource Stewardship's recommended changes to the Lobbyists Act. We at YW Calgary fully support the response and recommendations CCVO, the Edmonton Chamber of Voluntary Organizations and Volunteer Alberta have put forward.

YW Calgary, as bold advocates for women's equity and long standing providers of essential services for vulnerable women and their families, we urge the committee to keep the current exemption for public benefit non-profits intact in your review of the Lobbyists Act. YW Calgary, as a service delivery partner and frequent collaborator with government, is opposed to any changes to the non-profit organization exemption in the Lobbyists Act.

As stated in our letter of September 27, 2016, we believe lifting the non-profits exemption would negatively impact our ability to speak up for the needs of women in our community who are struggling with abuse, poverty and exclusion. For more than 106 years, we at YW have been focused on enhancing women's safety and well-being. Our Board of Directors re-committed in 2011 to be an organization which both serves and advocates to the benefit of women. We believe we have an obligation to speak up and speak out for the women with whom we work – as well as those women we hope never to meet - to affect long-term change through strong policy development.

The current recommendations from the Office of the Ethics Commissioner call for the removal of the exemption for public-benefit non-profits. In our view, this will silence the voices of organizations like ours. Removing the current exemption would add an unnecessary administrative burden and would have a detrimental effect on our work and our participation in dialogue with the Government of Alberta.

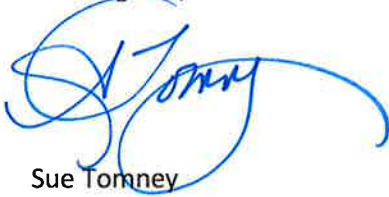
As the recommendations are currently written, all non-profit organizations participating in public advocacy would be required to register. While the registration is not burdensome, it is the tracking requirements that come with registering that could have a chilling effect on non-profits across the sector.

Non-profits who choose to register and to track interactions will need to increase staffing resources to meet the requirements of the Act. Additionally, these recommendations include changes to definitions by which some organizations qualify for exemption and others do not. The proposed changes will create more confusion for non-profit organizations who may not have the capacity to navigate an already complicated system and could result in an advocacy chill. Boards of Directors and executive teams may not support such activities for fear of being in violation of the Act and potentially of facing fines of \$25,000 or more.

The recommendations, in their current form, will impact the interactions non-profits will have with government as the definition of lobbying activities would extend to any interaction non-profits have with public officials. This will impact our organization's ability to provide feedback at budget consultations and in our regular and constructive discussions with our government funders. This runs contrary to repeated requests from both the civil service and elected officials who seek input and perspective from non-profits as a valued partner. Instead, it creates a greater burden on organizations who have the expertise and readiness to participate in the creation of fair, progressive policies by providing critical input on issues affecting vulnerable populations.

YW is proud to work with all levels of government to empower, advance and create opportunities for vulnerable women through engagement and advocacy. Thank you for the initial opportunity to provide input into the Standing Committee on Resource Stewardship's discussion, we hope you take seriously the recommendations from CCVO, the Edmonton Chamber of Voluntary Organizations and Volunteer Alberta. Please don't hesitate to contact Elsbeth Mehrer, VP Engagement & People at 403-705-5782 or by email at EMehrer@ywcalgary.ca for any questions or further conversations.

Best regards,



Sue Tomney
Chief Executive Officer
YWCA Calgary

cc:

Calgary Chamber of Voluntary Organizations
Minister of Culture and Tourism Ricardo Miranda
Minister of Finance Joe Ceci