



May 31, 2024

Garth Rowswell, MLA
Standing Committee on Resource Stewardship
c/o Committee Clerk, 3rd Floor, 9820 – 107 Street NW
Edmonton, Alberta, T5N 1E7

Dear Mr. Rowswell,

The Edmonton Chamber of Voluntary Organizations (ECVO) would like to thank you for the chance to comment on the Personal Information Protection Act (PIPA) review led by the Standing Committee on Resource Stewardship.

As with previous PIPA reviews, Alberta's non-profit sector continues to express concerns about the potential negative impacts of changes to this legislation on organizational capacity.

When examining the non-profit sector in Alberta, it is important to note that organizations are not equal. Many small and medium-sized non-profits run with limited human resources, which may or may not include paid staff. Volunteer-run non-profits tend to operate with extremely limited resources, experience high volunteer turnover, lack the formal systems/technology for data storage, and ability to invest in the kind of research needed to implement and fully comply with PIPA legislation.

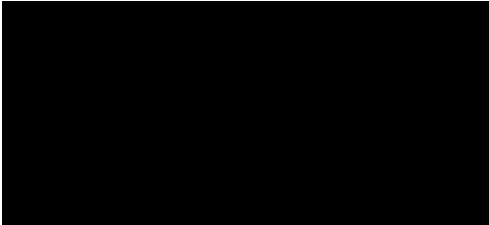
Additionally, the sector is experiencing a decline in volunteerism and a shortage of board members. Including non-profits under PIPA would add another layer of liability for board members, potentially exacerbating the challenges in recruiting and retaining them.

We believe as a sector that protection of people's personal information is of the utmost importance, many non-profit organizations already comply with other privacy legislations such as the HIA, FOIP, and PIPEDA. Staff members in these organizations are also bound by professional codes of ethics related to their professional designations. Therefore, we strongly feel that including non-profits in PIPA would impose redundant regulatory burdens and add red tape to those already following existing privacy laws.

We advocate for continued education on best practices for privacy protection as a sufficient measure. Consequently, we recommend that PIPA remain unchanged regarding Alberta's non-profit organizations.

Thank you for your time and continued consideration of the non-profit sector during your deliberations.

Sincerely,



Gemma Dunn
Executive Director