



June 3, 2008

Honourable Hector Goudreau

Minister of Immigration & Employment
#423 Legislature Building
10800-97 Avenue
Edmonton, AB
Canada T5K 2B6

Re: Bill 9 – Land Agents Licensing Amendment Act- 2008

All of the undersigned organizations wish to express their concern to the newly proposed amendments to the Land Agents Licensing Act. So far as we are aware there has been no government consultation with our organization(s) nor with any other industry organizations or stakeholders that may be impacted by the referenced changes to the Act.

The Land Agents Licensing Act was enacted as a result of pressure from the public for the province to govern the activities of Land Agents representing a variety of industries in Alberta who were acquiring an interest in land on behalf of their principals. The intent of this Legislative governance is to ensure competence and fairness in negotiations between landowners and industry. Since its enactment our organizations have assisted the government in developing educational qualifications and work experience requirements that must be met before a Land Agent's license can be obtained.

These educational requirements have been developed by the Alberta Land Agent's Advisory Committee which is comprised of representatives from our Associations, together with representatives of the agricultural community as represented by the Alberta Beef Producers, Alberta Surface Rights Federation, Wild Rose Agricultural Producers and Western Stockgrower's Association. The Alberta Energy and Utilities Board, Farmers Advocate's Office and the Registrar of Land Agents represent the regulators on this Committee. These collaborative Advisory Committee initiatives have resulted in the creation of a new class of professional Land Agents.

Given that the licensing of Land Agents and the governance of land agents has been assumed by the government, and given that the livelihood of land agents and educational programs are directly tied to the granting and maintenance of a land agents license to qualified individuals, any changes to the Act, like the changes being proposed by your office, will have a direct bearing on who can, in the future, earn a livelihood as a land agent in this province. We as industry associations have concerns that these changes are being put forward without any consultation and may lead to unintended consequences.

We agree that there is growing demand for landowner advisors, but we feel neither party is served well if the representation does not result in informed negotiations. Our suggestion would be that all paid advisors to landowners be required to have at least a working knowledge of the applicable legislation and regulations and be governed by the same code of ethics to which industry agents are held.

We therefore suggest that landowner advisors continue to be licenced under the Act, with a separate and distinct licence which would allow them to forego the supervisory/mentorship requirements which is seen as a barrier to landowner advisors obtaining a land agents licence thus disadvantaging landowners. This change to the Act would result in a growing pool of accredited and informed landowner advisors, which will benefit all parties.

We request that the government of Alberta defer further progress on Bill 9 which contains the proposed amendments to the Land Agents Licensing Act at least until the next sitting of the Alberta Legislature. This delay will enable the Government to initiate stakeholder consultations with the undersigned organizations, alongside all other relevant oil and gas industry organizations and all interested agricultural industry organizations and associations to explore the need and efficacy of the Act itself as well as the proposed changes to the Act.

We trust that you will recognize that we regard the proposed changes as endangering our profession, our professionalism, our educational qualifications program as well as our hard won status and reputation in the agricultural community. Your understanding and the governments cooperation is requested and required.

In recognition of the serious nature of our concerns many of our members have written to or contacted several MLA's. We have, concordant with their initiative, copied this letter to all members of the legislature.

Thank you for your immediate attention to this matter. If you have any questions or require clarification please contact Robert Telford at the CAPL office at: (403) 237-6635.

Sincerely,



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